

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

- Initial Assessment
- Annual Surveillance Assessment (2_1)
- Recertification Assessment (Choose an item.)
- Extension of Scope

Client Company Name / Parent Company: PT. Inti Indosawit Subur
Client Company / Parent Company Address: Jl Palembang Kav 35-37 Jakarta 10230, Indonesia
Certification Unit: PT. Inti Indosawit Subur – Buatan II Palm Oil Mill
Location of Certification Unit: Delik & Pangkalan Village, Bunut Langgam District, Pelalawan Regency, Riau Province, Indonesia
Date of Final Report: 22/10/2022

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Section 1: Scope of the Assessment

1. Company Details			
Parent Company	PT. Inti Indosawit Subur		
RSPO Membership Number	1-0022-06-000-00	Membership Approval Date	06/02/2006
Address	Jl Palembang Kav 35-37 Jakarta 10230, Indonesia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	PT. Inti Indosawit Subur – Buatan II Palm Oil Mill		
Location / Address	Delik & Pangkalan Village, Bunut Langgam District, Pelalawan Regency, Riau Province, Indonesia		
Website	www.asianagri.com		
Management Representative	Mr. Putu Ghrayte Yonata Akxa	E-mail	Putu_Akxa@asianagri.com
Telephone	+6221 2301119	Facsimile	+6221 2301120

2. Certification Information			
Certificate Number	RSPO 638947	Certificate Start Date	12/08/2021
Date of First Certification	16/09/2010	Certificate Expiry Date	11/08/2026
Scope of Certification	Production of Palm Oil and Palm Kernel		
Visit Objectives	<ul style="list-style-type: none"> • Determination of the conformity of the client's management system, or parts of it, with audit criteria. • Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements. 		
Assessment Cycle	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 2_1) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input type="checkbox"/> Choose an item. <input checked="" type="checkbox"/> Indonesia National Interpretation 2020 for RSPO P&C 2018 for the Production of Sustainable Palm Oil		
Supply Chain Module	<input type="checkbox"/> Identity Preserved; <input checked="" type="checkbox"/> Mass Balance	Mill Capacity	90 MT/hour
ISH certification Phase	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
ID05/65250	ISO 14001:2015	SGS	10/06/2023
EU-ISCC-Cert-DE100-02042122	ISCC EU	SGS	02/02/2023
SGS-ID-ISPO-0032	ISPO	SGS	20/03/2024

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Buatan II Palm Oil Mill	Delik & Pangkalan Village, Bunut Langgam District, Pelalawan Regency, Riau	00° 27' 36.0" N	101° 52' 02.5"E
Simpang Perak Estate	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau	00° 27' 36.0" N	101° 52' 02.5"E
KKPA Delima Sakti	Kerinci Kanan, Pangkalan Kerinci, Dayun District, Siak & Pelalawan Regency, Riau Province.	00° 27' 52.8" N	101° 57' 29.4" E
KUD Mulus Rahayu	Delima Jaya Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 30' 37.6" N	101° 49' 27.4" E
KUD Bhirawa Bhakti	Buana Bhakti Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 31' 20.1" N	101° 47' 24.7" E
KUD Tani Rukun	Simpang Perak Jaya Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 27' 03.2" N	101° 54' 03.2 E
KUD Kebun Sawit Harapan	Gabung Makmur Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 29' 10.9" N	101° 54' 36.7" E
KUD Buatan Jaya	Jatimulya Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 31' 06.8" N	101° 53' 53.0" E
KUD Mitra Usaha	Buatan Baru Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 32' 02.1" N	101° 52' 56.1" E
KUD Makarti Sawit	Buana Makmur Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 37' 13.7" N	101° 51' 56.6" E
KUD Bina Mulia	Suka Mulia Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 35' 08.0" N	101° 55' 25.6" E

Note: *Buatan Estate (Division IV, V and VI) and starting 1 Jan 2019 changes name to Simpang Perak Estate

5. Description of Supply Base					
New Planting Development	<input checked="" type="checkbox"/> No (no change in total planted area)		<input type="checkbox"/> Yes (please refer to Principle 7 for details)		
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Simpang Perak Estate	3,082	35.4	41.6	3,159	97.56
KKPA Delima Sakti (750 members)	1,490	0	0	1,490	100
KUD Mulus Rahayu (237 members)	702	0	0	702	100
KUD Bhirawa Bhakti (291 members)	984	0	0	984	100
KUD Tani Rukun (293 members)	962	0	0	962	100
KUD Kebun Sawit Harapan (218 members)	800	0	0	800	100
KUD Buatan Jaya (225 members)	860	0	0	860	100
KUD Mitra Usaha (361 members)	1,200	0	0	1,200	100
KUD Makarti Sawit (230 members)	800	0	0	800	100
KUD Bina Mulia (217 members)	872	0	0	872	100
Total	11,752	35.4	41.6	11,829	99.35

6. Plantings & Cycle						
Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Simpang Perak Estate	843	1,511	-	728	2,239	843
KKPA Delima Sakti	-	-	1,490	-	1,490	-
KUD Mulus Rahayu	310	-	4	388	392	310
KUD Bhirawa Bhakti	-	-	-	984	984	0
KUD Tani Rukun	-	-	462	500	962	-
KUD Kebun Sawit Harapan	-	-	344	456	800	-
KUD Buatan Jaya	-	-	200	660	860	-
KUD Mitra Usaha	-	-	100	1,100	1,200	-

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KUD Makarti Sawit	-	-	800	-	800	-
KUD Bina Mulia	-	-	872	-	872	-
Total (ha)	1,153	1,511	4,272	4,816	10,599	1,153
Note:						

7. Summary of Certified Tonnage of FFB (Own Certified Scope)				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Aug 2021 – July 2022)	Actual (Mar 2021 – April 2022)		Forecast (Aug 2022 – July 2023)
		Previous license period (Mar 2021-July 2021)	Current license period (Aug 2021 – Apr 2022)	
Simpang Perak Estate	52,822	30,963	65,003	101,171
KKPA Delima Sakti	27,695	9,725	16,555	23,912
KUD Mulus Rahayu	7,602	3,238	6,010	8,525
KUD Bhirawa Bhakti	22,978	6,027	8,757	13,449
KUD Tani Rukun	18,289	7,196	12,737	17,065
KUD Kebun Sawit Harapan	17,717	6,108	12,379	16,438
KUD Buatan Jaya	18,013	7,524	13,195	16,871
KUD Mitra Usaha	20,896	7,744	13,997	18,465
KUD Makarti Sawit	14,485	5,764	9,617	12,026
KUD Bina Mulia	12,465	4,573	8,623	9,952
Total	212,962*	255,735		237,874
Note: Actual period is 14 months (previous license + current license)				
*Total FFB including volume extension – 260,012mt				

8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Aug 2021 – July 2022)	Actual (Mar 2021 – April 2022)		Forecast (Aug 2022 – July 2023)
		Previous license period (Mar 2021-July 2021)	Current license period (Aug 2021 – Apr 2022)	
NIL		-	-	
Total		-		
Note:				

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9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage (MT) / year			
	Estimated last year (Aug 2021 – July 2022)	Actual (Mar 2021 – April 2022)		Forecast (Aug 2022 – July 2023)
		Previous license period (Mar 2021-July 2021)	Current license period (Aug 2021 – Apr 2022)	
3 rd Party	-	38,768	64,102	-
Total	-	102,870		-

Note: Actual period is 14 months (previous license + current license)

9A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	Month - Year	Volume of FFB from certified supply base (mt)	Volume of FFB from uncertified supply base (mt)	Total FFB/Month (mt)
1	March 2021	18,078	8,373	26,451
2	April 2021	16,844	7,139	23,983
3	May 2021	17,715	7,258	24,973
4	June 2021	18,679	7,289	25,968
5	July 2021	17,607	8,709	26,316
6	August 2021	20,676	8,808	29,484
7	September 2021	18,801	8,566	27,367
8	October 2021	15,318	2,007	17,325
9	November 2021	17,021	9,332	26,353
10	December 2021	19,403	8,544	27,947
11	January 2022	16,743	6,746	23,489
12	February 2022	16,090	6,002	22,092
13	March 2022	20,571	8,359	28,930
14	April 2022	22,220	5,738	27,958
TOTAL		255,766	102,870	358,636

Note:

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10. Summary of Certified Tonnage (MT) (not applicable for ISS)			
Estimated last year (Aug 2021 – July 2022)	Actual (Mar 2021 – April 2022)		Forecast (Aug 2022 – July 2023)
	Previous license period (Mar 2021-July 2021)	Current license period (Aug 2021 – Apr 2022)	
FFB	FFB		FFB
260,012 mt *	88,862 mt	166,843 mt	237,874 mt
	TOTAL	255,735 mt	
CPO (OER: 20.99%)	CPO (OER: 19.45%)		CPO (OER: 9.90%)
53,873 mt **	17,513 mt	32,230 mt	47,349 mt
	TOTAL	49,743 mt	
PK (KER: 5.50%)	PK (KER: 5.02%)		PK (KER: 5.40%)
14,065 mt ***	4,462 mt	8,367 mt	12,763 mt
	TOTAL	12,829 mt	

Note: Actual period is 14 months (previous license + current license)
* total FFB volume = 212,962mt + 47,050mt (volume extension)
** total CPO volume = 44,722mt + 9,151mt (volume extension)
*** total PK volume = 11,713mt + 2,353mt

10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	March 2021	3,692	937
2	April 2021	3,368	860
3	May 2021	3,412	873
4	June 2021	3,684	920
5	July 2021	3,357	872
6	August 2021	3,902	1,052
7	September 2021	3,686	988
8	October 2021	3,038	799
9	November 2021	3,292	865
10	December 2021	3,815	970
11	January 2022	3,316	815
12	February 2022	3,075	760
13	March 2022	3,899	1,015
14	April 2022	4,207	1,103
	TOTAL	49,743	12,829

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Note:

11. Summary of Actual Volume sold

Current License period (Aug 2021 – Apr 2022)

	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	28,854	3,253	0	0	32,107
PK (MT)	8,371	0	0	0	8,371
Credits	0	0	0	0	0

Previous License period (Mar 2021 -July 2021)

CPO (MT)	4,905	12,414	0	0	17,319
PK (MT)	4,359	0	0	0	4,359
Credits	0	0	0	0	0

Note: Conventional is RSPO certified material but sold as non-RSPO.

11A. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any)

No.	Buyers Name	PalmTrace Trading License Number	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	PT Sari Dumai Sejati	-	32,740	-
2	Apical Malaysia	-	519	-
3	PT Padang Raya Cakrawala	-	500	-
4	PT IIS – Buatan I KCP	-	-	12,730
TOTAL			33,759	12,730

Note:

11B. Records of certified CPO & PK Sold under other schemes since the last audit (if any)

No.	Buyers Name	Scheme Name	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	PT Sari Dumai Sejati	ISCC	15,667	-
TOTAL			15,667	-

Note:

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11C. Records of CPO & PK Sold as conventional since the last audit (if any)			
No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)
-	-	-	-
TOTAL		-	-

11D. Records of Certified CPO Sold under RSPO Credits since the last audit (if any)			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold
-	-	-	-
TOTAL			-

Note:

12. Independent Smallholders Certified Tonnage (MT) / Volume									
Phase	Estimated last year (Not applicable)			Actual (Not applicable)			Forecast (Not applicable)		
	Eligibility	MS A	MS B	Eligibility	MS A	MS B	Eligibility	MS A	MS B
	40%	70%	100%	40%	70%	100%	40%	70%	100%
FFB			-			-			-
IS-CSPO	-	-		-	-		-	-	
IS-CSPKO	-	-		-	-		-	-	
IS-CSPKE	-	-		-	-		-	-	
CSPK	-	-		-	-		-	-	

12A. Monthly Records of Certified CPO, PK & PKE (equivalent) produced since the last audit						
No.	Month - Year	FFB (MT)	Certified CPO (MT)	Certified PK (MT)	Certified PKO (MT)	Certified PKE (MT)
-	-	-	-	-	-	-
TOTAL		-	-	-	-	-

Note: 1 mt = 1 credit

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13. Independent Smallholders Actual Sold Tonnage / Volume							
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	CSPK	IS-CSPKO	IS-CSPKE
Current License period (Not applicable)							
Credits				-	-	-	-
Physical		-	-				
Previous License period (Not applicable)							
Credits				-	-	-	-
Physical	-	-	-				

13A. Records of Certified FFB, CPO, PK & PKE (including credits) sold since the last audit							
No.	Buyers Name	PalmTrace Trading License Number	FFB Sold (MT)	Certified CPO Sold (MT/credit)	Certified PK Sold (MT/credit)	Certified PKO Sold (MT/credit)	Certified PKE Sold (MT/credit)
-	-	-	-	-	-	-	-
TOTAL			-	-	-	-	-
Note:							

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn. Bhd. (ASI Accreditation Number: ASI-ACC-067)
Suite 29.01 Level 29, The Gardens North Tower,
Mid Valley City, Lingkaran Syed Putra,
59200 Kuala Lumpur, Malaysia.
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BSI is a leading global provider of management systems assessment and certification, with more than 92,000 certified locations and clients in over 193 countries. BSI is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (ASI-ACC-067) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia.

2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on **13-17/06/2022**. The audit programme is included as Section 2.3.

The approach to the audit was to treat the mill and supply base as an RSPO Certification Unit. A range of occupational health and safety, environmental, best practice management, and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas, local communities engagement and workers welfare and safety.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. Indonesia National Interpretation 2020 of the RSPO P&C 2018 was used as the normative reference to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

The minimum sample size is four estates. Sample size for certification unit with more than four (4) estates were determined based on formula $N = (\sqrt{y}) \times (z)$ where y is the number of estates and where z is the multiplier defined by risk assessment. While, the sampling of smallholders were based on the formula $(\sqrt{y}) \times (z)$; where y is total number of group member and where z is the multiplier defined by the risk assessment. The sampled smallholder listed in Appendix E.

Meetings were held with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and these have been incorporated into the assessment findings.

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Section 3.4.

The non-conformities for this audit are detailed in Section 3.3 and unless it is stated in this section, all previous nonconformities including minor nonconformities are remains closed.

This report is structured to provide a summary of assessment finding as provided in Appendix A. The assessment was conducted based on risk based approach sampling and therefore nonconformities may exist.

For Initial, Re-certification and Extension of Scope assessment, the report was externally reviewed by approved external peer reviewer prior to certification decision by BSI.

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For Annual surveillance assessment, the report was internally reviewed and approved by BSI qualified certification reviewer.

The following table would be used to identify the locations to be audited each year in the 5 year cycle

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Re- certification)	Year 2 (ASA 2_1)	Year 3 (ASA 2_2)	Year 4 (ASA 2_3)	Year 5 (ASA 2_4)
Buatan II Palm Oil Mill	X	X	X	X	X
Simpang Perak Estate	X	X	X	X	X
KKPA Delima Sakti	X	X	X	X	X
KUD Mulus Rahayu	X	X	X		X
KUD Bhirawa Bhakti	X		X		X
KUD Tani Rukun		X	X		X
KUD Kebun Sawit Harapan	X		X		X
KUD Buatan Jaya	X			X	
KUD Mitra Usaha		X		X	
KUD Makarti Sawit		X		X	
KUD Bina Mulia				X	

Tentative Date of Next Visit: June 13, 2023 - June 17, 2023

Total Number of Mandays: 20 Mandays

2.2 BSI Assessment Team

Name	Role	Competency
Nanang Rusmana	Team Leader	<p>Education: Holds a Bachelor Degree of Forestry, Bogor Agricultural University (IPB)</p> <p>Work Experience: 5 years working experience in palm oil industry as SHE Assistant at PT. Astra Agro Lestari Tbk. 3 years working experience in mining industry as Environment Coordinator and SHE Coordinator with PT. Kapuas Prima Coal Group. 6 years working experience as RSPO/ISPO auditor</p> <p>Training attended: Completed ISO 9001:2015 Lead Auditor Course, ISPO Auditor Course, ISO 14001:2015 Lead Auditor Course, ISO 45001:2018 Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, Endorsed RSPO Supply Chain Certification Lead Auditor Course, SMK3 Auditor Course, HCV Assessor Course, General OHS Expert Course, SMETA Requirements training.</p> <p>Language proficiency: Fluent in Bahasa Indonesia and English</p> <p>Aspect covered in this audit: During this audit, During this assessment, he assessed on Best Management Practise for Mill and Estate, operation</p>

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		procedure, continuous improvement, long term business plan, time bound plan.
Edy Widodo	Team Member	<p>Education: Holds a Bachelor Degree majoring Agricultural Technology from University of Padjadjaran, Bandung.</p> <p>Work Experience: 8 years working experience in palm oil industry as Agronomist and Assistant Manager in various companies. 9 year working experience as RSPO/ISPO auditor.</p> <p>Training attended: Completed ISO 9001 Lead Auditor Course, ISPO endorsed auditor course, Understanding ISO 14001 training, Auditing ISO 14001: 2004 training, Endorsed RSPO Supply Chain Certification Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, SMETA Requirements Training, Introductory Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation.</p> <p>Language proficiency: Fluent in Bahasa Indonesia and English</p> <p>Aspect covered in this audit: During this audit, he assessed on the aspects of transparency, company policy, social and labor. He also conducted public consultation with related stakeholders.</p>
Imam Fakhrurozi	Team Member	<p>Education: Holds a Bachelor Degree majoring in Agriculture Technology, Gadjah Mada University.</p> <p>Work Experience: 2 years working experience oil palm industry, as a sustainability and HSE officer. 7 years working experience as RSPO Auditor / Lead Auditor</p> <p>Training attended: Completed ISO 9001:2008 Lead Auditor Course, 14001:2004 Lead Auditor Course, SMK3 Lead Auditor Course, Endorsed RSPO P&C Lead auditor course, ISO 45001:2018 Lead Auditor Course, SMETAR requirements training, Introductory Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation</p> <p>Language proficiency: Fluent in Bahasa Indonesia and English</p> <p>Aspect covered in this audit: During this audit, During this assessment, he assessed on the aspects of OHS and Environmental management and monitoring and</p>
Mujinius Jalaraya	Team Member	<p>Education: Holds a Bachelor Degree majoring in Forest Resources Conservation and Ecotourism, Bogor Agricultural University (IPB).</p> <p>Work Experience: 6 years working experience in palm oil plantations as SHE Assistant at PT. Astra Agro Lestari Tbk and Sustainability Supervisor at Teladan Prima Group. 8 years working experience as RSPO Auditor / Lead Auditor.</p> <p>Training attended: Completed ISO 9001 Lead Auditor course, ISPO Lead Auditor course, Endorsed RSPO P&C Lead Auditor course, Endorsed RSPO SCCS Lead Auditor course, Introductory Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation, ISO 14001 Internal Auditor Training, ISO 45001 Lead Auditor course, OHS Expert Training, SMETA Requirements Training</p> <p>Language proficiency: Fluent in Bahasa Indonesia and English</p> <p>Aspect covered in this audit: During this audit, he assessed on the aspects of supply chain for mill, HCV management and monitoring.</p>

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Accompanying Persons: NIL

Name	Role
NIL	-

1.3 Assessment Plan

The Assessment plan was sent to the client prior to the assessment.

Date	Time	Subjects	MJ	EWI	IF	NR
Monday, 13/06/2022	08.00 – 08.30	Opening Meeting Presentation by PT. IIS – Buatan II POM, Estate and Smallholder Presentation by BSI Indonesia	√	√	√	√
	08.30 – 12.00	Field Visit to Simpang Perak Estate: - Herbicide application programmes, harvesting, fertilizing operations, water management, road maintenance, terracing, HCV's, riparian zones, etc. - Agrochemical stores, Fertilizer store, workshops, housing, landfill, clinic, riparian zones, Hazardous Waste, waste management, etc. - Boundaries inspection, worker interviews, social amenities, etc. - Interview with: Labour Union and Gender Committee.	√	√	√	√
	12.00 – 14.00	Break	√	√	√	√
	14.00 – 17.00	Field Visit to Buatan II POM Inspection of processing, warehouse, workshop, mill wastes management, Effluent Ponds, OHS, Environment issues, POME application, workers interview, Supply chain for CPO mill, Review on SEIA documents and records, Document review, etc.	√	√	√	√
	14.00 – 17.00	Stakeholder consultation: Local government of Pelalawan Regency (DLH, Disbun, Dinsakertrans & BPN), Village head, surrounding community, NGO.		√		

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Date	Time	Subjects	MJ	EWI	IF	NR
Tuesday, 14/06/2022	08.00 – 12.00	Field Visit to Scheme Smallholder: KKPA Delima Sakti Harvesting; Spraying; Boundaries inspection; HCV Area Field Visit to Scheme Smallholder: KUD Mitra Usaha Field visit to Kavling/Block member of Smallholder to verify conformity with RSPO INA NI 2020 Standard, BMP, OHS-EMS Implementation, HCV, Social and Labor, Continual improvement, etc. (15 samples)	√	√		
	12.00 – 14.00	Break	√	√	√	√
	14.00 – 17.00	Field Visit to Scheme Smallholder: KUD Makarti Sawit Field visit to Kavling/Block member of Smallholder to verify conformity with RSPO INA NI 2020 Standard, BMP, OHS-EMS Implementation, HCV, Social and Labor, Continual improvement, etc. (15 samples) Field Visit to Scheme Smallholder: KUD Bina Mulia Field visit to Kavling/Block member of Smallholder to verify conformity with RSPO INA NI 2020 Standard, BMP, OHS-EMS Implementation, HCV, Social and Labor, Continual improvement, etc. (15 samples)	√	√		
Wednesday, 15/06/2022	08.00 – 12.00	Field Visit to Scheme Smallholder: KUD Mulus Rahayu Field visit to Kavling/Block member of Smallholder to verify conformity with RSPO INA NI 2020 Standard, BMP, OHS-EMS Implementation, HCV, Social and Labor, Continual improvement, etc. (15 samples)	√	√	√	√
	12.00 – 14.00	Break	√	√	√	√
	14.00 – 17.00	Document review for Simpang Perak Estate, Buatan II POM <ul style="list-style-type: none"> - Occupational Health and Safety, HCV, Environment - Aspect, time bound plan. - Social Aspect and workers welfare, worker consultation, - Stakeholder Consultation, impact assessments, 	√	√	√	√

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Date	Time	Subjects	MJ	EWI	IF	NR
		<p>policies.</p> <ul style="list-style-type: none"> - Best Management Practice for Mill and supply chain for mill. - Operation Procedure, organization commitments, Legal compliance, continuous improvement, long term business plan. 				
Thursday, 16/06/2022	08.00 – 12.00	<p>Document Review for Scheme Smallholder</p> <p>Cooperative (KUD) document review, management of smallholder, Group Manager, BMP, OHS-EMS Implementation, HCV, Social and Labor, Continual improvement, etc.</p>	√	√	√	√
	12.00 – 14.00	Break	√	√	√	√
	14.00 – 17.00	<p>Document Review for Scheme Smallholder</p> <p>Cooperative (KUD) document review, management of smallholder, Group Manager, BMP, OHS-EMS Implementation, HCV, Social and Labor, Continual improvement, etc.</p>	√	√	√	√
Friday, 17/06/2022	08.00 – 12.00	<p>Document review for Simpang Perak Estate, KKPA Delima Sakti, Buatan II POM and Scheme Smallholder</p>	√	√	√	√
	12.00 – 14.00	Break	√	√	√	√
	14.00 – 15.00	Report preparation	√	√	√	√
	15.00 – 17.00	Closing Meeting	√	√	√	√

Section 3: Assessment Findings

3.1 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?	PT Inti Indosawit Subur has explained the certification plan for all of its subsidiaries; indicating all palm oil mills, company-owned estates and scheme smallholder as the supply base.	Complied
Have all the estates and mills certified within five (5) years after obtaining RSPO membership? If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021	There is remaining mill and estate that has not certified yet, PT Mitra Unggul Pusaka – Segati POM and supply bases (Segati Estate and Gonadai Estate). The unit has gone through the RSPO Stage 2 certification audit in 2014, however it was not succeed. The company’s sustainability team has conducted latest RSPO internal audit on 25 – 31 October 2017. Segati Palm Oil Mill (PT Mitra Unggul Pusaka) located in Pelalawan, Riau planned for Re-Audit in year 2022, re-audit certification has conducted on 29 November – 3 December 2021 by TUV Rheinland. PT Mintra Unggul Pusaka - Penarikan Mill and Supply bases (Penarikan Estate) located in Pelalawan Riau planned for eaudit in year 2022, and re-audit certification has concuted on 29 November – 3 December 2021 by TUV Rheinland. For Bahilang Estate (Supply bases for Tanah Datar Mill) planned in year 2022 due to still in process of RACP (recertification 2020). Teluk Panjie Estate (801ha) as supply bases for Teluk Panjie Mill planned in 2022 due to HGU still in process. Sentral Estate (Supply bases for Gunung Melayu II POM planned in 2022 due to still in process of RACP (recertification 2020).	Complied
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available. If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021.	No, there is no new acquisition conducted by PT Inti Indosawit Subur and its subsidiary.	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	Yes, there is time bound plan revision dated 1 July 2021, signed by Management Representative. Justification available, it caused by status of disclosure PT MUP is in progress of	Complied

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	review by RSPO. PT MUP will conduct re-audit in 2022.	
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?	Yes, there is time bound plan revision dated 1 July 2021, signed by Management Representative. Justification available, it caused by status of disclosure PT MUP is in progress of review by RSPO. PT MUP has undergo re-audit in Dec 2021.	Complied
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	No	Complied
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised	No	Complied
Un-Certified Units or Holdings		
No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12.	Based on Time Bound Plan revised 1 July 2021, PT Mitra Unggul Pusaka – Segati Mill located in Pelalawan, Riau Province postponed to Re-Audit in year 2021. Status of RaCP and relevant issues are still in progress and waiting for RSPO feedback. Company revised the Time bound plan on 1 July 2021 and the plan for certification is change due to RaCP still under process. According to Land Use change analysis, there are several area conversion from rubber plantation to become palm oil plantation, no primary forest. Latest progress of RaCP based on email correspondence between company and RSPO dated 3 December 2020, confirmed that RSPO has review the concept note and there is a comment to be improved and company has given the feedback and revision of Concept Note on 6 May 2021 and waiting for the review from RSPO secretariat. The company has sent an email to the RSPO Secretariat on 5 August 2022 and has been responded by RSPO Secretariat on 8 August 2022. The email from the RSPO Secretariat said that the RSPO Secretariat has received the additional document related to the draft agreement between PT MUP and CFES (Community Forest Ecosystem Services) and MoM on the initial communication between CFES and Kelompok Pengelola Hutan Adat (KPHA) Biang Sari related to location of remediation. And RSPO Secretariat will send the documents to the	Complied

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	compensation panel along with the revised concept note.	
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	<p>PT Mitra Unggul Pusaka – Segati Mill RaCP and relevant issues are still in progress and waiting for RSPO feedback. According to Land Use change analysis, there are several area conversion from rubber plantation to become palm oil plantation, no primary forest.</p> <p>Latest progress of RaCP based on email correspondence between company and RSPO dated 3 December 2020, confirmed that RSPO has review the concept note and there is a comment to be improved and company has given the feedback and revision of Concept Note on 6 May 2021 and waiting for the review from RSPO secretariat.</p> <p>The company has sent an email to the RSPO Secretariat on 5 August 2022 and has been responded by RSPO Secretariat on 8 August 2022. The email from the RSPO Secretariat said that the RSPO Secretariat has received the additional document related to the draft agreement between PT MUP and CFES (Community Forest Ecosystem Services) and MoM on the initial communication between CFES and Kelompok Pengelola Hutan Adat (KPHA) Biang Sari related to location of remediation. And RSPO Secretariat will send the documents to the compensation panel along with the revised concept note.</p>	Complied
Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.	<p>According to internal audit result on December 2020, there is no land conflict occur in PT Mitra Unggul Pusaka – Segati Mill. In addition the company has been certified for ISPO (Indonesian Sustainable Palm Oil) since December 2016.</p> <p>According to the RSPO RaCP tracker (https://www.rspo.org/certification/remediation-and-compensation/racp-tracker) update 01 September 2022, PT Inti Indosawit Subur has:</p> <ul style="list-style-type: none"> • MU’s with potential liabilities: 4 units • LUCA Submitted (MUs): 4 units • LUCA review completed (MUs): 4 units • Concept Note required (MUs): 3 units • Concept Note submitted (MUs): 2 units • Concept Note approved (MUs): 0 • Concept Note submitted (MUs): 0 • Concept Note endorsed (MUs): 0 	Complied

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	<ul style="list-style-type: none"> • Remediation Plan required (MUs): 4 units • Remediation Plan submitted (MUs): 0 • Remediation Plan approved (MUs): 0 	
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	Internal audit has conducted for Penarikan Mill on 28 January 2021 and 20-25 June 2022, Bahilang Estate on 25-26 July 2021 and 08-09 February 2022, Teluk Panji Estate on 20-23 July 2021 and 18-23 February 2022 and Sentral Estate on 18-19 September 2021 and 22-27 August 2022, there is no Labor disputes occur in this management unit. In addition the company has been certified for ISPO (Indonesian Sustainable Palm Oil) since December 2016.	Complied
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	Internal audit has conducted for Penarikan Mill on 28 January 2021 and 20-25 June 2022, Bahilang Estate on 25-26 July 2021 and 08-09 February 2022, Teluk Panji Estate on 20-23 July 2021 and 18-23 February 2022 and Sentral Estate on 18-19 September 2021 and 22-27 August 2022, there is no legal non-compliance occur in this management unit. In addition the company has been certified for ISPO (Indonesian Sustainable Palm Oil) since December 2016.	Complied
Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.	Internal audit has conducted for Penarikan Mill on 28 January 2021 and 20-25 June 2022, Bahilang Estate on 25-26 July 2021 and 08-09 February 2022, Teluk Panji Estate on 20-23 July 2021 and 18-23 February 2022 and Sentral Estate on 18-19 September 2021 and 22-27 August 2022. Report of internal audit are available.	Complied
Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?	According to internal audit result, there is no Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates.	Complied
Have there been any stakeholder (including NGO) consultation conducted?	During internal audit (Penarikan Mill on 28 January 2021 and 20-25 June 2022, Bahilang Estate on 25-26 July 2021 and 08-09 February 2022, Teluk Panji Estate on 20-23 July 2021 and 18-23 February 2022 and Sentral Estate on 18-19 September 2021 and 22-27 August 2022), stakeholders consultation already conducted. There is no issue.	Complied

3.2 Progress of scheme smallholders and/or outgrowers

Progress of scheme smallholders or outgrowers towards compliance with relevant standards		
Requirement	Remarks	Compliance
<p>Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification?</p> <p>OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years.</p>	<p>Yes, PT Inti Indosawit Subur Group has including 100% the scheme smallholder in their certification.</p>	<p>Complied</p>

Approved Time Bound Plan

Name of Mill	Mill Address	Name of Supply Bases	Estate Address	Time Bound for Certification	Status
Buatan I Mill – PT Inti Indosawit Subur	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau	Buatan Estate	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau	2010	Certified on 16 September 2010 Re-Certified on 16 September 2015
		Buatan (Plasma)	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau		
Buatan II Mill - PT Inti Indosawit Subur	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau	Simpang Perak Estate*	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau	2010	Certified on 16 September 2010 Re-Certified on 16 September 2015 *Split From Buatan Estate Since 1 January 2019
		Buatan (Plasma)	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau		
Ukui I Mill - PT Inti Indosawit Subur	Ukui Village, Ukui District, Pelalawan Regency, Riau	Ukui Estate	Ukui Village, Ukui District, Pelalawan Regency, Riau	2011	Certified on 1 March 2011 Re-Certified on 1 March 2016
		Sei Lala Estate*	Ukui Village, Ukui District, Pelalawan Regency, Riau	2011	*Split From Ukui & Soga Estate Since 1 January 2019
		Ukui (Plasma)	Ukui & Lubuk Batu Jaya District, Pelalawan & Inhu Regency, Riau	2011	Certified on 1 March 2011 Re-Certified on 1 March 2016
Ukui II Mill - PT Inti Indosawit Subur	Ukui Village, Ukui District, Pelalawan Regency, Riau	Soga Estate	Ukui Village, Ukui District, Pelalawan Regency, Riau	2011	Certified on 1 March 2011 Re-Certified on 1 March 2016
		Ukui (Plasma)	Ukui & Lubuk Batu Jaya District, Pelalawan & Inhu Regency, Riau	2011	Certified on 1 March 2011 Re-Certified on 1 March 2016
Tungkal Ulu Mill - PT Inti Indosawit Subur	Pulau Pauh / Penyabungan / Merlung Village, Tungkal Ulu	Tungkal Ulu Estate	Pulau Pauh / Penyabungan / Merlung Village, Tungkal Ulu	2012	Certified on 15 August 2012 Re-Certification on August 2017

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	District, Tanjung Jabung Regency, Jambi		District, Tanjung Jabung Regency, Jambi		
		Tungkal Ulu (Plasma)	Renah Mendalo, Merlung, Muara Papalik District, Tanjung Jabung Barat Regency,	2012	Certified on 15 August 2012 Re-Certification on August 2017
Muara Bulian Mill - PT Inti Indosawit Subur	Singoan / Bukit Sari / Bulian Jaya Village, Muara Bulian / Pemayung District, Batang Hari Regency, Jambi	Muara Bulian Estate	Singoan / Bukit Sari / Bulian Jaya Village, Muara Bulian / Pemayung District, Batang Hari Regency,	2013	Certified on 12 July 2013 Re-Certification on August 2017
		Muara Bulian (Plasma)	Maro Sebo Ilir District, Batanghari Regency, Jambi	2013	Certified on 12 July 2013 Re-Certification on August 2017
Topaz Mill – PT Tunggal Yunus Estate	Petapahan Village, Tapung District, Kampar Regency, Riau	Topaz Estate	Petapahan Village, Tapung District, Kampar Regency, Riau	2015	Certified on 30 March 2015
Taman Raja Mill – PT Dasa Anugrah Sejati	Lubuk Bernai / Kampung Baru / Pelabuhan Dagang / Pematang Pauh Vilage, Tungkal Ulu District, Tanjung Jabung Regency, Jambi	Taman Raja, Badang & Bernai Estate*	Lubuk Bernai / Kampung Baru / Pelabuhan Dagang / Pematang Pauh Vilage, Tungkal Ulu District, Tanjung Jabung Regency, Jambi	2015	Certified on 20 February 2015 *Bernai Estate Split From Taman Raja & Badang Estate Since 1 January 2019
Segati Mill – PT Mitra Unggul Pusaka	Langkan / Penarikan / Tambak / Sotol Village, Langgam District, Pelalawan Regency, Riau	Segati Estate	Langkan / Penarikan / Tambak / Sotol Village, Langgam District, Pelalawan Regency, Riau	Re-audit in 2022	Re-Audit Certification on 29 November - 3 December 2021 by TUV Rheinland.
		Gondai Estate	Pangkalan Sarik / Baru Village, Langgam / Siak Hulu District, Pelalawan / Kampar Regency, Riau	Re-audit in 2022	Re-Audit Certification on 29 November - 3 December 2021 by TUV Rheinland.
Penarikan Mill – PT Mitra Unggul Pusaka	Penarikan Village, Langgam District, Pelalawan Regency, Riau	Penarikan Estate*	Penarikan / Tambak Village, Langgam District, Pelalawan Regency, Riau	Re-audit in 2022	Re-Audit Certification on 29 November - 3 December 2021 by TUV Rheinland.

Tanah Datar Mill – PT Supra Matra Abadi	Tanah Datar Petatal Village, Talawi District, Asahan Regency, North Sumatera	Tanah Datar Estate	Tanah Datar Petatal Village, Talawi District, Asahan Regency, North Sumatera	2015	Certified on 18 May 2015
		Bahilang Estate	Bahilang Village, Tebing Tinggi District, Serdang Bedagai Regency, North Sumatera	2022	*Bahilang Estate On Process RaCP (Recertification 2020)
Aek Nabara Mill – PT Supra Matra Abadi	S1-S3 / Sukadame Village, Bilah Hulu / Kota Pinang District, Labuhan Batu Regency, North Sumatera	Aek Nabara Estate	S1-S3 / Sukadame Village, Bilah Hulu / Kota Pinang District, Labuhan Batu Regency, North Sumatera	2015	Certified on 6 March 2015
Teluk Panjie Mill – PT Supra Matra Abadi	Teluk Panjie Village, Kampung Rakyat District, Labuhan Batu Regency, North Sumatera	Teluk Panjie Estate (3,885 Ha)	Teluk Panjie Village, Kampung Rakyat District, Labuhan Batu Regency, North Sumatera	2015	Certified on 21 April 2015
		Teluk Panjie Estate (801 Ha)		2022	HGU is still in Process
Peranap Mill – PT Rigunas Agri Utama	Simelinyang / Pauh Ranap / Sengkilo Village, Peranap District, Indragiri Hulu Regency, Riau	Peranap Estate	Simelinyang / Pauh Ranap / Sengkilo Village, Peranap District, Indragiri Hulu Regency, Riau	2015	Certified on 7 January 2015
		Peranap (Plasma)		2016	Certified on 18 August 2016
Bungo Tebo Mill – PT Rigunas Agri Utama	Tuo Sumai / Sungai Rambai Village, PWK Sumai / Tebo Ulu District, Bungo Tebo Regency, Jambi	Bungo Tebo Estate	Tuo Sumai / Sungai Rambai Village, PWK Sumai / Tebo Ulu District, Bungo Tebo Regency, Jambi	2015	Certified on 3 December 2015
		Bungo Tebo (Plasma)		2017	Certified on 7 February 2017
Tanjung Selamat Mill – PT Indo Sepadan Jaya	Kampung Padang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatera	Tanjung Selamat	Kampung Padang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatera	2015	Certified on 26 May 2015
		Pangkalan	Sennah Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatera	2015	Certified on 26 May 2015
Gunung Melayu I – PT Saudara Sejati Luhur	Rahuning Village, Bandar Pulau District, Asahan	Pulau Maria Estate	Rahuning Village, Bandar Pulau District, Asahan Regency, North Sumatera	2015	Certified on 7 September 2015

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	Regency, North Sumatra				
Gunung Melayu II – PT Gunung Melayu	Gonting Malaha Village, Bandar Pulau District, Asahan Regency, North Sumatra	Aek Tarum & Batu Anam Estate	Gonting Malaha Village, Bandar Pulau District, Asahan Regency, North Sumatra	2015	Certified on 8 July 2015
		Sentral Estate		2022	*Sentral Estate On Process RaCP (Recertification 2020)
Negri Lama II Mill – PT Hari Sawit Jaya	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	Negri Lama	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	2016	<ul style="list-style-type: none"> • Certified on 23 December 2016 as Independent Mill • Audit in 2016 as Mill and Supply Base
		Aek Kuo (2,088 Ha)		2018	HGU Complete Audit at ASA 3 (2018)
		Aek Kuo (501 Ha)		2018	
Negri Lama I Mill – PT Hari Sawit Jaya	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	*3rd party which is excluded from scope of certification	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	2015	<ul style="list-style-type: none"> • Certified on 8 April 2015 • Audit in 2016 as Independent Mill

3.3 Details of Nonconformities

The nonconformities are listed below. The findings summary of the assessment by criteria are listed in Appendix A.

During this Assessment there were 2 (two) Minor nonconformities raised. The Buatan II POM Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment. The implementation of the Corrective Actions for the Critical Nonconformity(ies) has been verified for its effectiveness and closed accordingly. The below is the summary of the non-conformity raised during this assessment.

Non-conformity			
NCR Ref #	2213475-202206-N1	Issued Date	17/06/2022
Due Date	Next audit	Closure Date	Next audit
Indicator & Category (Critical / Minor)	3.7.3 - minor		
Statement of Nonconformity:	Personal carrying out the tasks critical for SCCS implementation was not trained properly		
Requirement Reference:	Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.		
Objective Evidence:	During the interview with weighbridge clerk at Buatan II Mill confirmed that the weighbridge clerk (on behalf Putri Gea Indrasari) has not been trained for RSPO SCCS, in addition she has not understand about the RSPO SCCS.		
Corrections:	The organizations conduct SCCS training to the weighbridge clerk on behalf Putri Gea Indrasari.		
Root Cause Analysis:	When the SCCS training was held, the employee on behalf of Putri Gea Indrasari could not attend due to permission. For head of administrative (KTU) who were present during the training, they had not socialized to employees.		
Corrective Actions:	At the time of SCCS training all PICs related to the SCCS must follow it. If someone is unable to attend, KTU will conduct socialization again to employees who are not present.		
Assessment Conclusion:	The effectiveness of the CAP will be verified in the next surveillance audit.		

Non-conformity			
NCR Ref #	2213475-202206-N2	Issued Date	17/06/2022
Due Date	Next ASA	Closure Date	Next ASA
Indicator & Category (Critical / Minor)	6.7.2 - minor		
Statement of Nonconformity:	The organization have an emergency procedures but its implementation is inconsistent		

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Requirement Reference:	Accident and emergency procedures in Indonesian language are in place and clearly understood by all workers. Assigned operatives trained in first aid are present in both field and other operations. First aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.
Objective Evidence:	During field visit there were found inconsistencies on implementation: The fire extinguisher at Gudang TUS and clinic are empty, and the seals are broken. Emergency Response Procedure was not clearly understood by assigned operators at PBD (Hydrant near Boiler Station).
Corrections:	<ul style="list-style-type: none"> Replacing the empty fire extinguisher with a new one Conducting emergency response simulation
Root Cause Analysis:	<ul style="list-style-type: none"> Inconsistency from the PIC in replacing the empty fire extinguisher There are new employees who have not participated in the emergency response simulation because it is panned in the next agenda.
Corrective Actions:	<ul style="list-style-type: none"> Appoint an assistant at each station as the PIC to conduct monitoring of fire extinguisher at each station. Establish an emergency response simulation training schedule so that it is monitored.
Assessment Conclusion:	The effectiveness of the CAP will be verified in the next surveillance audit.

Opportunity for Improvements	
OFI #	Description
OFI 1	NIL

Positive Findings	
PF #	Description
PF 1	NIL

3.3.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	2032041-202103-N1	Issued Date	11/03/2021
Due Date	ASA 2_1	Closure Date	15/06/2022
Indicator & Category (Critical / Minor)	6.2.7 (Minor)		
Statement of Nonconformity:	Based on document verification and interview with some employees, management unit used non-permanent/daily workers for the core work (92 harvester) and 12 mill		

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	operators in Buatan II POM. This is not accordance with RSPO requirements related to permanent and full-time employment in palm oil plantation.
Requirement Reference:	Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.
Objective Evidence:	<p>Management unit has identified the core work in oil palm plantations Based on Circular Letter from GAPKI No. 073/GAPKI/II/2013 dated 8 February 2013 concerning Circular for the Flow of Work Implementation Process Activities in the Oil Palm Plantation Business Sector, stating that; only 2 (two) jobs that are the main activities in the Oil Palm Plantation industry, namely harvesting and product processing activities.</p> <p>Based on employee’s master of Simpang Perak Estate period December 2020 verification obtained information as follows:</p> <ul style="list-style-type: none"> • Harvester from period 2010-2015: 12 harvesters • Harvester from period 2016-2019: 57 harvesters • Addition of harvester in 2020: 23 harvesters <p>Total: 92 harvesters</p> <p>There was only one Promotion of PHL (Daily workers) to SKU (permanent workers) in 2021 on behalf of harvester Radot Butar Butar (refer to memorandum No. 004/HR-RO2/MEMO/SK/01/2021 dated 30 January 2021).</p> <p>Buatan II POM:</p> <p>There is a record of mill operator as per December 2020:</p> <ul style="list-style-type: none"> • Worker from period 2011-2015: 6 workers • Worker from period 2016-2020: 6 workers <p>Total: 12 workers</p>
Corrections:	Propose, evaluate and monitor the process of hiring employees for stage 1 and stage 2, in accordance with the 2021 program
Root Cause Analysis:	The unit's employment conditions and the limitations of the unit human resources department to appointed casual worker to be as permanent worker
Corrective Actions:	<ol style="list-style-type: none"> 1. Make an internal memo regarding core workers under 2018 2. Create a gradual employee recruitment program for 2021 - 2026 3. Monitor and evaluate the annual appointment program
Assessment Conclusion:	<p>The organization has shown the evidence regarding the corrective action as follows: internal memo regarding core workers under 2018, a gradual employee recruitment program and monitoring and evaluating the annual appointment program.</p> <p><u>Simpang Perak Estate:</u></p> <p>Company has promoted the Appointment of PHL harvesters as follow:</p> <ul style="list-style-type: none"> - Period Jan – Dec 2021, based on Memorandum no. 845/ES-KSP/MEMO/10/2021 dated 1 October 2021, as many as 14 harvesters. - Semester I of 2022, 14 harvesters of PHL have been appointed as SKUH based on Memorandum No. 188/ES-KSP/MEMO/03/2022 dated 10 March 2022. - Promotion plan for the appointment of the next PHL harvesters per year as many as 22 harvesters.

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	<p>Temporary workers shall be regulate to use not only for harvesting but will be used for another supporting jobs such as: upkeeping, pruning, EFB application). Estate manager and assistant monitor the temporary workers usage in accordance with labor regulation.</p> <p><u>Buatan II POM:</u> Based on Employee Master per May 2022, Buatan II POM has had 109 employees consisting 93 SKU employees and 16 PHL employees. Buatan II POM has made a PHL employee appointment program that has been known by the District Manpower and Transmigration Office, Pelalawan Regency: The company has promoted the appointment of PHL workers, as follows:</p> <ul style="list-style-type: none"> - In 2021, 8 workers have been appointed PHL to become SKUH based on the Memorandum from Regional Head, Plt-2 No. 232/HR-RO2/MEMO/SK/10/2021 dated 19 October 2021. <p>Appointment program for PHL in Y2022 is 16 workers. Currently the temporary workers are not used as main work at mill.</p>
Effectiveness Closure (for previous audit closed Critical NC):	Non Conformity was closed on 15 June 2022

Non-conformity			
NCR Ref #	2032041-202103-N2	Issued Date	11/03/2021
Due Date	ASA 2_1	Closure Date	15/06/2022
Indicator & Category (Critical / Minor)	7.3.2 (Minor)		
Statement of Nonconformity:	The handling of hazardous waste is inconsistent with the procedure to handle hazardous waste titled "Prosedur Penanganan Limbah B3" No. AA-KL-06-EFP explains methods to collecting the waste, recording in balance and disposal through licensed third-party transporter		
Requirement Reference:	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.		
Objective Evidence:	Based on a field visit at Buatan II POM (dated 5 March 2021), the auditor team found empty containers of hazardous material in the scrap yard (total 3 items), this was not in accordance with the procedure to handle hazardous waste titled "Prosedur Penanganan Limbah B3" No.AA-KL-06-EFP explains methods to collecting the waste, recording in balance and disposal through licensed third party transporter.		
Corrections:	Installing a signboard in the form of a prohibition on disposing of scheduled waste carelessly		
Root Cause Analysis:	Lack of awareness and understanding of units in managing scheduled waste in the work environment.		
Corrective Actions:	Provide socialization to workers and staff regarding the understanding of scheduled waste and waste sorting in the work environment on a regular basis		

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Assessment Conclusion:	The signboard regarding the prohibition on disposing of scheduled waste has shown during audit. The socialization to workers and staff regarding the understanding of scheduled waste and waste sorting in the work environment on a regular basis has shown during audit.
Effectiveness Closure (for previous audit closed Critical NC):	Non Conformity was closed on 15 June 2022

Non-conformity			
NCR Ref #	1937028-202007-M1	Issued Date	23 July 2020
Due Date	22 October 2020	Closure Date	17 October 2020
Indicator & Category (Critical / Minor)	3.8.6 Critical (Major)		
Statement of Nonconformity:	Internal audit 2020 has been conducted on 2- 5 June 2020 by Internal Auditor, however the internal audit findings were not appropriate and the evidence of follow up action cannot be demonstrated.		
Requirement Reference:	Internal Audit i. The mill shall have a written procedure to conduct annual internal audit to determine whether the mill; a) Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. b) Effectively implements and maintains the standard requirements within its organization. Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.		
Objective Evidence:	PT. Inti Indosawit Subur – Buatan II POM has a procedure to conduct internal audit RSPO, including RSPO SCCS as per Procedure of Traceability (AA-MPM-OP-1400.17-R7) chapter 6.7. Internal audit conducted twice a year. Latest internal audit has been conducted on 2- 5 June 2020 by Internal Auditor, internal audit report were evident in Module E report, however the internal audit findings were regarding the shipping announcement of CPKO which is not related to mill instead KCP. In addition there is no evidence of correction and corrective action done to close the issue.		
Corrections:	Revision for internal audit report of RSPO SCCS has been made on 28 August 2020. Internal audit findings were adjusted to Buatan II Palm Oil Mill and correct the typo error of KCP. Report amendment can be demonstrated during audit. Based on the results of the verification of the internal audit report, it can be shown that the report is appropriate, and the checklist used was the latest audit checklist according to RSPO P&C 2018, INA NI 2020. Audit findings, root cause analysis, correction and corrective action and its evidence can be shown in the report of internal audit.		

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Root Cause Analysis:	Lack of understanding of the internal auditor team regarding the latest audit checklist used for internal audit of the RSPO SCCS Buatan II POM.
Corrective Actions:	<p>Internal Audit Manager has carried out the refreshment training for internal audit team on 11 September 2020 by online training. Evidence of training can be demonstrated as per Zoom Meeting record dated 11 September 2020. Training material and minutes of training are available and verified.</p> <p>Internal audit department has made the improvement plan to address the internal audit issue and to enhance the internal audit performance. Improvement plan present as per "IMPROVEMENT PLAN INTERNAL AUDIT RSPO SCCS Tahun 2020". Improvement plan are including: Refreshment training plan, Internal audit procedure review, Pilot project of internal audit improvement process, review the external audit as the reference.</p>
Assessment Conclusion:	<p>Based on the corrective action above, these NC can be closed.</p> <p>The effective implementation will be verifying during onsite audit.</p> <p>During the onsite audit, auditor team has verified the internal audit supply chain. The record of follow up has been documented. Based on that fact, this noncompliance satisfactorily closed.</p>
Effectiveness Closure (for previous audit closed Critical NC):	During ASA2_1 has been reviewed that the company has implemented the corrective action plan effectively, so that there is no more findings on this indicator.

Non-conformity			
NCR Ref #	1937028-202007-M2	Issued Date	23 July 2020
Due Date	22 October 2020	Closure Date	17 October 2020
Indicator & Category (Critical / Minor)	3.8.16 Critical (Major)		
Statement of Nonconformity:	<p>According to transaction record in Palmtrace and Book Keeping record confirmed that there were 3 transaction record with shipping announcement in the RSPO IT Platform made more than 3 month after Bill of Lading, i.e:</p> <ul style="list-style-type: none"> • BL date CSPK to Buatan I KCP dated 29/02/2020, volume 822.57 MT, Shipping announcement was made on 09/07/2020 • BL date CSPK to Buatan I KCP dated 29/02/2020, volume 822.57 MT, Shipping announcement was made on 09/07/2020 • BL date CSPK to Buatan I KCP dated 31/03/2020, volume 747.95 MT, Shipping announcement was made on 09/07/2020 		
Requirement Reference:	<p>Registration of Transactions</p> <p>i. Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p>		

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	Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.
Objective Evidence:	<p>Transaction record in Palmtrace and Book Keeping record 2019/2020 confirmed that there were 3 transaction record with shipping announcement in the RSPO IT Platform made more than 3 month after Bill of Lading, i.e:</p> <ul style="list-style-type: none"> • BL date CSPK to Buatan I KCP dated 29/02/2020, volume 822.57 MT, Shipping announcement was made on 09/07/2020 • BL date CSPK to Buatan I KCP dated 29/02/2020, volume 822.57 MT, Shipping announcement was made on 09/07/2020 • BL date CSPK to Buatan I KCP dated 31/03/2020, volume 747.95 MT, Shipping announcement was made on 09/07/2020
Corrections:	<p>Buatan II POM has made an update and internal coordination regarding the implementation of RSPO SCCS standards for Palm Oil Mill that the shipping announcement must be made a maximum of 3 months after the delivery transaction/BL date is made. Internal coordination between sustainability department, purchasing and palm Oil Mill unit can be demonstrated through email correspondence.</p> <p>Shipping announcements after July 2020 are made maximum of 3 months after the transaction. The following is an example of the shipping announcement that has been made for CSPK:</p> <ul style="list-style-type: none"> • Transaction ID # TR-f0b4300c-244d, Product name: CSPK, Seller: PT Inti Indosawit Subur - Buatan II (RSPO_PO1000000382), Buyer: PT Inti Indosawit Subur - Buatan I KCP (RSPO_PO1000002758), Shipping/BL Date: 31/07/2020, Confirmation Date (Shipping announcement): 21/10/2020, Volume: 962.92 MT. • Transaction ID # TR-f3b6de19-360c, Product name: CSPK, Seller: PT Inti Indosawit Subur - Buatan II (RSPO_PO1000000382), Buyer: PT Inti Indosawit Subur - Buatan I KCP (RSPO_PO1000002758), Shipping/BL Date: 31/08/2020, Confirmation Date (Shipping announcement): 21/10/2020, Volume: 917,92 MT. <p>From above shipping announcement can be demonstrated that Shipping announcement are made not more than 3 month after shipping/BL date.</p>
Root Cause Analysis:	PICs that make the shipping announcement do not update regarding the latest RSPO SCCS requirements for Palm Oil Mill that the PKS shipping announcement must be made a maximum of 3 months after dispatch/Bill of Lading date.
Corrective Actions:	<p>Certificate holder has made the form of monitoring indicated the CSPK produce and delivery by Buatan II POM to buyer (KCP or other party). Monitoring of CSPK production and delivery are made each month as a reference for the shipping announcements made by PIC (Jakarta Office). Monitoring form since July 2020 - October 2020 can be demonstrated during audit.</p> <p>Shipping announcements are made based on SOP AA-SM-405.2-R3. From the July - October period it was confirmed that there were no RSPO certified CPO sales and only RSPO certified PK sales.</p>
Assessment Conclusion:	<p>Based on the corrective action above, these NC can be closed.</p> <p>The effective implementation will be verifying during onsite audit.</p>

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	During the onsite audit, auditor team has verified the record of transaction has been registered/reported in RSPO IT Platform. Based on that fact, this noncompliance satisfactorily closed.
Effectiveness Closure (for previous audit closed Critical NC):	During ASA2_1 has been reviewed that the company has implemented the corrective action plan effectively, so that there is no more findings on this indicator.

Non-conformity			
NCR Ref #	1937028-202007-M3	Issued Date	23 July 2020
Due Date	22 October 2020	Closure Date	17 October 2020
Indicator & Category (Critical / Minor)	6.6.2 Critical (Major)		
Statement of Nonconformity:	The certificate holder (PT Inti Indosawit Subur - Buatan II POM and supply bases) cannot show the specific company procedures and policies related to temporary workers/PHL (Perjanjian Kerja Waktu Tertentu/PKWT).		
Requirement Reference:	(C) Where temporary or migrant workers are employed, a specific labour policy and procedures are established and implemented		
Objective Evidence:	<p>PT Inti Indosawit Subur – Buatan II Group uses temporary workers as BHL in Simpang Perak Estate and Buatan II Mill operations. Based on employee list period June 2020, there are 411 workers in Simpang Perak Estate and 13 workers in Buatan II Mill.</p> <p>The company has a procedure regarding SOP New Employee Reception No. AA-HR-305.2-R0 dated 1 February 2009, this procedure is a general acceptance of employees (for all employees), but there are no specific procedures and policies regarding BHL or PKWT workers according to the RSPO P&C requirements.</p>		
Corrections:	<p>PT Inti Indosawit Subur – Buatan I POM and Estate has issued the specific labour policy and procedures for temporary workers (PHL/PKWT); The policy and procedure are issued for each unit as below:</p> <ul style="list-style-type: none"> • Buatan II POM: Memorandum No. 201/MI-MEMO/PBD/08/20, dated 11 August 2020. • Buatan Estate: Memorandum No. 341/ES-KSP/MEMO/08/2020, dated 10 August 2020. <p>The policy and procedure have been communicated to workers, especially to temporary workers at Buatan I POM on 22 August 2020, while in Buatan Estate socialization conducted on 15 August 2020 to workers of Afdeling I - III, Traksi and adminsitration. The procedure was explaining the detail of mechanism for temporary workers recruitment, promotion of temporary workers to be permanent workers, term and condition and requirement of temporary workers in accordance with National regulation (UU No. 13 tahun 2003).</p>		
Root Cause Analysis:	There has been no coordination between the sustainability department and the HR department in adjusting for updates/changes to the implementation of the RSPO INA NI 2020 principles and criteria, including updating procedures for PHL/PKWT.		

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Corrective Actions:	PT Inti Indosawit Subur - Buatan II POM & Estate will review the policy and procedure including the implementation of procedure periodically in coordination with Human Resources Department. Sustainability team has made the coordination with HR department and Estate/Mill department to keep updated the policy and procedure according to relevant regulation.
Assessment Conclusion:	Based on the corrective action above, these NC can be closed. The effective implementation will be verifying during onsite audit. During the onsite audit, auditor team has shown the specific company procedures and policies related to temporary workers/PHL (Perjanjian Kerja Waktu Tertentu/PKWT). Based on that fact, this noncompliance satisfactorily closed.
Effectiveness Closure (for previous audit closed Critical NC):	During ASA2_1 has been reviewed that the company has implemented the corrective action plan effectively, so that there is no more findings on this indicator.

Non-conformity			
NCR Ref #	1937028-202007-M4	Issued Date	23 July 2020
Due Date	22 October 2020	Closure Date	17 October 2020
Indicator & Category (Critical / Minor)	7.10.1 Critical (Major)		
Statement of Nonconformity:	Buatan II POM has monitored the emission and pollutants from estate and mill operation using PalmGHG Version 4. However, it was found that information used for GHG calculation in Buatan II POM using PalmGHG Version 4, was not accurate – compared against the estate and mill operational database.		
Requirement Reference:	(C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimize them are implemented, monitored through the Palm GHG calculator and publicly reported.		
Objective Evidence:	<p>Audit team was found that the calculation for Buatan II POM, using PalmGHG Version 4 was not accurate – compared against the estate and mill operational database.</p> <p>Example of database seen:</p> <ul style="list-style-type: none"> • From PalmGHG version 4 => the figure for FFB supplied from Buatan Estate & Simpang Perak Estate were stated 51,913 tons – whereby the planted hectareage of 3,505.67 Ha resulting in yield 14.81 ton FFB/Ha/year. The database (LHP) shown the FFB figure from Buatan Estate and Simpang Perak Estate (supplying to Buatan II POM) were 51,524.17 tons. • The figure for FFB supplied from Buatan II Smallholder stated 125,720 tons. The data provided shown the FFB figure from Buatan II Smallholders (supplying to Buatan II POM) was 121,051.61 tons; - The figure for FFB supplied from 3rd party stated 85,097 tons. The data provided shown the FFB figure from 3rd party (supplying to Buatan II POM) was 85,486.47 tons; <p>The organization has submitted the GHG for 2020, however the sources of data input period January to December 2019.</p>		

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Corrections:	<p>The company has revised the GHG data input by adjusting the actual data reported by Buatan I POM and Estate. GHG Calculation amendment can be demonstrated during audit as per " GHG Assessment Report.</p> <p>Summary Report 2020 PT INTi Indosawit Subur - Buatan I POM". Based on verification data of data input GHG compare to actual data reported by Buatan II POM and Supply Bases confirmed that the data input in GHG calculation are met and in line with actual data of Buatan II POM and Supply Bases. Input data verify covering: FFB production (own, group & third party), CPO & PK production, OER, KER, PK Shell production and sales, POME production, EFB production, Fertilizer usage (own & group plantation), Planted area (own and group), Conservation area, Fossil fuel usage, Grid electricity, etc.</p> <p>According to GHG summary report, GHG summary emission are: 0.74 tCO2 e/t CPO and 0.74 tCO2 e/t PK.</p>
Root Cause Analysis:	Lack of coordination between the Mill and Estate units in terms of providing raw data with the Jakarta Office that performs GHG calculations.
Corrective Actions:	The Jakarta Office (JRO) coordinates with Buatan II POM & Estate units in terms of providing raw data for input on GHG calculations. Before calculating, JRO cross-checks and verifies the mill and plantation units documented in the "GHG RSPO Sheet". In this form, it is reconfirmed the suitability of the GHG data input with the actual data from the mill and estate reports. GHG RSPO sheet can be demonstrated during audit verification.
Assessment Conclusion:	<p>Based on the corrective action above, these NC can be closed.</p> <p>The effective implementation will be verifying during onsite audit.</p> <p>During the onsite audit, auditor team has shown the GHG calculation in Buatan II POM using the latest PalmGHG Version (Version 4). It has been tally with the estate and mill operational data. Based on that fact, this noncompliance satisfactorily closed.</p>
Effectiveness Closure (for previous audit closed Critical NC):	During ASA2_1 has been reviewed that the company has implemented the corrective action plan effectively, so that there is no more findings on this indicator.

Opportunity for Improvements	
OFI #	Description
OFI 1	<p>Principle 4 Use of appropriate best practices by growers and millers - Indicator 4.6.4</p> <p>Although the use of paraquat is decrease from 2016 (2,211 L), use of paraquat was increase in 2017 to 2018, the use in 2017 is 1,914 L whilst the use in 2018 is 1,983 L.</p> <p>Verification / Follow-up actions:</p> <p>Certificate holder no longer using paraquat since 15 November 2019, according to the circular letter of Deputy Managing Director No. 008/DMD/MEMO/OCT/19 dated 22 October 2019.</p>

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
Previous Assessment (ASA-1.4)				
1800365-201906-M1	Critical	4.7.3	10 July 2019	Closed on 30 August 2019
1800365-201906-M2	Critical	4.5.1	10 July 2019	Closed on 30 August 2019
1800365-201906-M3	Critical	4.6.5	10 July 2019	Closed on 30 August 2019
1800365-201906-M4	Critical	5.5.2	10 July 2019	Closed on 30 August 2019
1800365-201906-N1	Minor	6.2.3	10 July 2019	Closed on 23 July 2020
Recertification Assessment (Remote Audit)				
1937028-202007-M1	Critical	3.8.6	23 July 2020	17 October 2020
1937028-202007-M2	Critical	3.8.16	23 July 2020	17 October 2020
1937028-202007-M3	Critical	6.6.2	23 July 2020	17 October 2020
1937028-202007-M4	Critical	7.10.1	23 July 2020	17 October 2020
Recertification Assessment (Onsite Audit)				
2032041-202103-N1	Minor	6.2.7	5 March 2021	15 June 2022
2032041-202103-N2	Minor	7.3.2	5 March 2021	15 June 2022
Surveillance Audit (ASA2_1)				
2213475-202206-N1	Minor	3.7.3	17 June 2022	Open
2213475-202206-N2	Minor	6.7.2	17 June 2022	Open

3.4 Stakeholders and previous land owner / user consultation

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss Buatan II POM Certification Unit's environmental and social performance, legal and any known dispute issues.

Meetings were conducted with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and later was verified with the management team. Any comment which is not complying to the RSPO P&C requirements have been incorporated as an assessment finding.

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as below.

Stakeholders contacted		
Type of Stakeholder (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	Stakeholder name / organization	Means of communication (e.g. face to face interview, email, phone interview, comment from public notice)
Gender Committee: Chief of Gender Committee in Scheme Smallholder PT IIS - Buatan Group)	Ibu Yusniarty	Face to face
Workers of PT Inti Indosawit Subur – Buatan II POM and Supply Bases	Workers during field visit	Face to face
Government Departments: <ul style="list-style-type: none"> ▪ Environmental Office of Pelalawan Regency ▪ Department of Plantation in Pelalawan Regency ▪ Department of Manpower of Pelalawan Regency 	<ul style="list-style-type: none"> ▪ Mr Demsi S ▪ Mr Hery HP ▪ Mr Iskandar 	Phone interview
Head of Village: <ul style="list-style-type: none"> ▪ Simpang Perak Village ▪ Kumbara Utama Village 	<ul style="list-style-type: none"> ▪ Mr Rubiman Z ▪ Mr Suroso 	Phone interview
Union Labour –PUK SPSI <ul style="list-style-type: none"> ▪ Chief of labour union ▪ Secretary of labour union 	<ul style="list-style-type: none"> ▪ Mr Siswanto ▪ Mr A Stenly 	Phone interview
NGO Forum Komunikasi Petani PIR Kelapa Sawit (FKPPKS)	Mr Sunardi	Phone interview

Stakeholders comment	
1	<p>Feedbacks:</p> <p>Dinas Perkebunan Kabupaten Pelalawan – Plantation Agency Pelalawan Regency</p> <ul style="list-style-type: none"> ▪ PT Inti Indosawit Subur – Buatan Group POM has obtained HGU and in line with spatial planning for Pelalawan Regency, as cultivation/plantation area. ▪ Company has reported the plantation operation activities on regular basis to “Dinas Kehutanan dan Perkebunan Kabupaten Pelalawan Semester II 2021”. ▪ In the 2021-2022 period, there are no issues that arise from the surrounding community or other institutions. ▪ The company has obtained Plantation Business Permit (IUP) ▪ There is no report related to land claim and land dispute occurred and submit by community or other company. ▪ If the plasma replanting program has been agreed upon by all parties, so the program could be submitted to the Pelalawan District Plantation Office. ▪ FFB price established based on market price, and company was not bound to FFB price regulated by “Keputusan Penyusunan Harga TBS Propinsi Riau”. Based on report, PT Inti Indosawit Subur – Buatan II POM has price structure better than other companies.

	<p>Audit Team verification and response:</p> <ul style="list-style-type: none"> ▪ Company acknowledge the comment from Plantation Agency. ▪ The Group's Buatan Plantation has made a replanting program from 2016 – 2027. ▪ In October 2021, the <i>Forum Komunikasi Petani PIR Kelapa Sawit</i> (FKPPKS) of Asian Agri's Buatan Group Plantations issued an application letter No. 003/FKPPKS-X/2021 concerning Application for FFB Prices for plasma farmers Buatan. There are 4 proposed points, namely: <ol style="list-style-type: none"> 1. The company sets the price of Plasma FFB referring to the price of Amanah FFB, this is based on the fact that the Amanah Association has obtained the RSPO certificate and the FFB price is more stable 2. FFB Prices are valid until the oil palm plant is replanted 3. There is a defense of FFB prices in partnership with companies 4. FFB receipt system in accordance with applicable company rules. ▪ In 22 October 2021 through a letter from the Head of Plasma Buatan Group no. 184/ES-KLB/EXT/10/2021 regarding the FFB Price Determination of Plasma Buatan, explains that, the determination of the plasma FFB price refers to the CSV FFB price – the Amanah Association which is effective as of 22 October 2022. ▪ The audit team had verified PT Inti Indosawit Subur – Buatan Group related to the palm oil replanting program in the Buatan Plasma Group, the organization has sent a report to the “Dinas Perkebunan Kabupaten Pelalawan”. ▪ Verification on the pricing of FFB in Plasma Buatan Group has been carried out by verifying the letter from FKPPKS dated 10 October 2021 as well as a reply to the letter from the Management of Plasma Buatan group on 22 October 2022 which has agreed to fix the price of FFB referring to the Amanah Association.
<p>2</p>	<p>Feedbacks:</p> <p>Environmental office of Pelalawan Regency - Dinas Lingkungan Hidup Kabupaten Pelalawan</p> <ul style="list-style-type: none"> ▪ Company has revised the AMDAL document. ▪ Company has an environmental document related to development of biogas plant and kernel crushing plant. ▪ Replanting activity has been covered in environmental management and monitoring plan. ▪ Company has consistently reporting the environmental management: <i>Laporan RKL-RPL, Laporan Pengelolaan Limbah B3, Laporan Pemanfaatan Limbah Cair</i>. ▪ PT Inti Indosawit Subur – Buatan II POM has performed environmental management in good manner. ▪ Hazardous waste/LB3 monitoring report on Shelter Temporary (TPS) Hazardous waste/LB3 has been done. ▪ Company has managed the hazardous waste, obtained permit for temporary storage – in accordance with relevant regulation. <p>Audit Team verification and response:</p> <ul style="list-style-type: none"> ▪ For the positive things that have been done will be maintained and improved towards a better by management companies. ▪ For the plan of replanting activities, of course there are many social issues arising from environmental impacts. In this case, the company has conducted a social impact aspect (SIA) assessment which subsequently made a social impact management plan. Plans for management and monitoring of social impacts to avoid or reduce negative impacts and promote positive ones presented in “<i>Rencana Kelola Dampak Sosial dan Rencana Pemantauan Dampak Sosial</i>”.

<p>3</p>	<p>Feedbacks: Department of Manpower of Pelalawan Regency:</p> <ul style="list-style-type: none"> ▪ Generally, PT Inti Indosawit – Buatan II POM has built good communication with Manpower and Transmigration Office – Pelalawan Regency. ▪ PT Inti Indosawit Subur – Buatan II POM has complied well with legislation related to employment, i.e.; - Company has provided all normative rights for employee, such as salary as lined out in minimum wage for province level, leave entitlement, employees registered with social insurance for worker (BPJS), benefit for religious festival, provision of facilities (housing, electricity, clean water, medical clinic, school/school bus, worship house, personal protective equipment, working tools, etc.). - There was no report/complaint logged in related to discriminative action by company. There was no report/complaint logged in related to the use of child worker/under age worker. - Company has submitted health and safety performance report regularly to the manpower agency. - Complaint received from worker union related to medical service provided by “BPJS Kesehatan”, in particular medical treatment service from hospital/clinic are not covered by BPJS. - There is no industrial relationship dispute occurred from the last year. - No identified issues related to the use of child labor, violence and forced labor. - Company has prepared infrastructure and facility for worker’s welfare such as: housing, clean water, electricity, medical facility, education, etc. <p>Audit Team verification and response:</p> <ul style="list-style-type: none"> ▪ The company has taken action in accordance with well-established procedures and persuasive approach, so there is no turmoil/issue. ▪ The audit team had verified PT Inti Indosawit Subur – Buatan Group related to the services of “BPJS Kesehatan”, the organization has shown the evidence of communication to the BPJS Office, BPJS Office will improve services from the hospital/clinic that is complained of. ▪ With respect to wages, the use of PPE and SIO, the company has implemented in accordance with relevant law and regulations.
<p>4</p>	<p>Feedbacks: NGO; Forum Komunikasi Petani PIR Kelapa Sawit (FKPPKS)</p> <p>The price of FFB for third parties supplier is determined based on the market price, and the company is not bound by the price of FFB as regulated in the “Decisions on Formulating FFB Prices for Riau Province”. Based on the report, PT Inti Indosat Subur – Buatan II POM have a better price structure than other companies.</p> <p>Audit Team verification and response:</p> <p>In October 22, 2021 through a letter from the Head of Plasma Buatan Group no. 184/ES-KLB/EXT/10/2021 regarding the FFB Price Determination of Plasma Buatan, explains that: The determination of the plasma FFB price refers to the CSV FFB price – the Amanah Association which is effective as of October 22, 2022. Acknowledge by the auditor as a positive response</p>
<p>5</p>	<p>Feedbacks: Head of Simpang Perak Jaya Village Head of Kumbara Utama Village:</p> <ul style="list-style-type: none"> ▪ Villagers around ethnically are Batak, Javanese, Sundanese and Banjar. ▪ There was no land conflict between company with surrounding community.

	<ul style="list-style-type: none"> ▪ No land conflict was reported since hand-over was done in proper settlement in the beginning. ▪ In general communication and coordination between the village government and the Company has gone well. ▪ The company always responds to any problems submitted by the village government officials or from the surrounding community, villagers have confirmed that organization has done some positive CSR activities on their surroundings. Routinely companies provide assistance through CSR programs in the form of borrowing heavy equipment (excavators, graders and compactors), scholarships, assistance to the poor, religious facilities, etc. ▪ Access roads surrounding villages are always maintained by the company. ▪ Enclave owner has proper access to their own farm inside company’s farm without any difficulties. ▪ Employee recruitment from the surrounding villages was not adequate. ▪ No identified issues related to the use of child labor, violence and forced labor ▪ There are no reports from the public regarding the operational activities of companies that violate Human Rights such as the Right to Organize and assemble Conduct worship in accordance with beliefs, as well as other practices of violation of Rights such as the use of mercenaries for the intimidation of workers, the sale of human beings etc.
	<p>Audit Team verification and response:</p> <ul style="list-style-type: none"> ▪ Management will strive to continue and improve the positive practices in implementing company commitment towards health and safety, and upholding the human rights. ▪ Acknowledge by the auditor as a positive response.
<p>6</p>	<p>Feedbacks:</p> <p>Gender Committee:</p> <ul style="list-style-type: none"> ▪ Company has implemented the policy related to protection reproductive right; such as not hiring female for work activity with high risk; monthly pregnancy test for sprayer and fertilizer applicator; 6-monthly check up for sprayer and fertilizer applicator. ▪ All female worker in sprayer team and fertilizer team shall join pregnancy test in company clinic, once a month. ▪ There has been no report logged in to committee related to sexual harassment and/or violence. ▪ There is no indication that company practicing sexual harassment, no indication of gender discrimination, no indication of human right violation, and forced labor. ▪ The leader of gender committee has not understood what the work program is and procedure in case of sexual harassment.
	<p>Audit Team verification and response:</p> <p>Management will strive to continue and improve the positive practices in implementing company commitment towards health and safety, and upholding the human rights.</p> <p>The appointment of the head of the new gender committee was conducted in May 2022, so it is necessary to undertake learning and training and briefing related to the knowledge of gender committees.</p> <p>Acknowledge by the auditor as a positive response.</p>

List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
NIL	-	-	-	-	-

PT Inti Indosawit Subur – Buatan II POM has established since 1985 and has planting palm oil since 1988, 1989, 1990 and 1991. Currently the palm oil has been replanting since 2014 – 2021.

Previous land owner / user comment



-	Feedbacks: NIL
	Audit Team verification and response: NIL

3.5 Impartiality and conflict of interest

During this assessment there was no circumstances or pressure that had influenced the independence or confidentiality of the assessment team.

Formal Signing-off of Assessment Conclusion and Recommendation

The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that **Buatan II POM** has complied with the Indonesia National Interpretation 2020 of the RSPO P&C 2018 and audit criteria identified within the audit report. It is deemed that the management system has achieved its intended outcomes. Therefore, it is recommended that **Buatan II POM** is remain certified.

Report prepared by	Acceptance of Assessment Conclusion
Name: Nanang Rusmana	Name: Putu Grhyate Yonata Aksa
Company Name: On behalf of BSI Services Malaysia Sdn. Bhd.	Company Name: PT. Inti Indosawit Subur – Buatan II POM
Title: Lead Auditor	Title: Sustainability Manager
Signature: 	Signature: <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i> 
Date: 20 September 2022	Date: 25 September 2022

Appendix A: Summary of Findings

Criterion / Indicator	Assessment Findings	Compliance	
<p>Principle 1: Behave ethically and transparently</p>			
<p>Drive ethical business behaviour, build trust and transparency with stakeholders to ensure strong and healthy relationships.</p>			
<p>Criteria 1.1: The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.</p>			
<p>1.1.1</p>	<p>(C) Management documents that are specified in the RSPO P&C are made publicly available.</p>	<p>Buatan II POM, Estate and Scheme Smallholder: PT Inti Indosawit Subur – Buatan Group including Scheme Smallholder has had list of information and listed in “<i>Daftar Dokumen dan Informasi untuk Diakses Publik PT Inti Indosawit Subur - Buatan Group</i>”, established on 5 January 2022, there are 32 type of document of information, among others:</p> <ol style="list-style-type: none"> 1. Location permit and principal permit (<i>Izin Lokasi, Izin Prinsip</i>) 2. Land titles/user rights (IPKH, Certificate of HGU, HGB and IMB) 3. Occupational health and safety plans (<i>Laporan Pelaksanaan P2K3</i>) 4. Plans and impact assessments relating to environmental and social impacts (AMDAL, Environmental licensing and Environmental Management Program) 5. HCV & HCS documentation (Conservation Management Plan, HCV Report, Social Impact Assessment and HCV Identification Report) 6. Pollution prevention and reduction plans (Environmental Management Program, Hazardous waste Report- “<i>Laporan LB3</i>”, Land Application Report and also Report of physical and chemical analysis of river water) 7. Details of complaints and grievances (Procedure of Information handling, Procedure of “<i>keluhan konflik lahan</i>” and records of and 	<p>Complied</p>

		<p>recording of deliberation process and compensation).</p> <p>8. Negotiation procedures (Recording of deliberation process and compensation)</p> <p>9. Continuous improvement plans (Continuous Improvement Program)</p> <p>10. Human Rights Policy including in the Company Policy update on 1 December 2019 including the policy on protection of human rights defenders (HRDs)/Whistle-blowers. has been dissemination to all operation at workplace on 10-12 February 2021)</p> <p>The document mentioned above can be accessed by stakeholders by making an official application to the management. Requests for information/document can be in the form of verbal or official letters, requests for information / documents will be received by the Public Relations / KTU and recorded in the log book.</p>	
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders.	<p>PT Inti Indosawit Subur – Buatan Group has provide the public information in Bahasa Indonesia. The information contain in the document can be understood by all stakeholder. It was confirmed by audit team during stakeholder consultation. There are 32 information accessible by stakeholder as explain above in indicator 1.1.1.</p> <p>The list of information was disseminated on 10-12 February 2021 to all operation at workplace and stakeholder as well.</p> <p>Corporate policy has been socialized/disseminated to all levels of PT IIS – on 10-12 February 2022 (list of participants can be shown) and on stakeholders (including local contractors) on 23-24 March 2022 which was attended by 31 stakeholders. Evidence of socialization can be shown during audit.</p>	Complied
1.1.3	(C) Records of requests for information and responses are maintained.	<p>Requests for information are responded by the department concerned in accordance with their authority. The company has developed a matrix describing the status of each information request and responsible to respond into. The company has appointed personal responsibility in</p>	Complied

		<p>accepting and responding to the request for information from the stakeholders, the personal responsible is the HUMAS (Public Relations). Appointment based on Transfer Letter No. 226/HRD/AA/TL/XI/2014 dated 7 November 2014 and also organisation raised the Internal Memorandum No. 388/ES-KBN/MEMO/06/2015 dated 1 June 2015 related to Duties and Responsibilities of Buatan Group Public Relations to Mr. Lindu Simatupang (as a Public Relation on PT IIS – Buatan Group).</p> <p>Certification holder has a procedure of consultation and communication is records on SOP No. AA-GL-5008.1-R1: <i>Penanganan Permintaan Informasi Stakeholder</i>. The consultation and communication procedure was socialized to stakeholder on on 10-12 February 2021 (list of participants can be shown) and on stakeholders (including local contractors) on 23-24 March 2021 which was attended by 31 stakeholders.</p> <p>Records of response of request information documented in the same book, consist of person handle the request, information given and acknowledgement from the person in-charge and signature. Record of incoming communication available in each estate and mill unit.</p> <p>The request for information was recorded on Log Book “<i>Surat Masuk dan Keluar</i>” on period 2022, taken example:</p> <p>Simpang Perak Estate:</p> <ul style="list-style-type: none"> • On 10 February 2022, request for information from the Head of Pangkalan Kerinci sub-district letter no. 800/UM/2020/40, regarding the invitation for the 2022 population census coordination meeting and was responded to on 10 February 2022. • On 3 March 2022, request for information from the Majelis Talim Al Mukhlisin letter No. 002/MT/III/2022 regarding loaning of bus, has been responded to on 3 March 2022 by the Plantation Manager. <p>Smallholder Scheme</p>	
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		<p>Request Information and response from Stakeholder is documented in log book "Kebun Plasma Buatan". Up to May 2022, there was 8 information requests in Plasma/smallholder Division, mostly request EFB for fertilizer in scheme smallholder area. Based on procedure stated that responds for information request within 14 days.</p> <p>Sample seen:</p> <ul style="list-style-type: none"> • On 16 February 2022, request for information from KUD Makarti Sawit letter No. 60/KUD-MS/II/2022, regarding the replanting socialization and has been responded to on February 16, 2022, which will be carried out on February 20, 2022. • On 1 April 2022, request information from the KUD Bina Mulia letter no. 174/KUD-BM/IV/2022, regarding the addition of TBS Plasma transportation. Responded April 1, 2022. <p>Based on the verification of the information logbook document, all requests for information from stakeholders and other related parties have been responded to in accordance with established procedures.</p> <p>During interview with stakeholder confirmed that if there is an information request from stakeholder, company immediately respond to them. No issue regarding the timeline of information request response from PT Inti Indosawit Subur – Buatan Group.</p>	
1.1.4	<p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official.</p>	<p>Certification holder has a procedure of consultation and communication as per SOP No. AA-GL-5008.1-R1: <i>Penanganan Permintaan Informasi Stakeholder</i>. This procedure is available in Bahasa Indonesia and can be access by stakeholder. The consultation and communication procedure was socialized to stakeholder on 5 January 2022 and participated by 17 stakeholders.</p> <p>The company has appointed personal responsibility in accepting and responding to the request for information from the stakeholders, the personal responsible is the HUMAS (Public Relations). Appointment based on Transfer Letter No. 226/HRD/AA/TL/XI/2014 dated 7 November 2014</p>	Complied

		<p>and also organisation raised the Internal Memorandum No. 388/ES-KBN/MEMO/06/2015 dated 1 June 2015 related to Duties and Responsibilities of Buatan Group Public Relations to Mr. Lindu Simatupang (as a Public Relation on PT IIS – Buatan Group). The Internal Memorandum is also explained about the duties and responsibilities of public relations, including: is responsible for receiving and responding to information from stakeholders.</p> <p>Records of response of request information documented in the same book, consist of person handle the request, information given and acknowledgement from the person in-charge and signature. Record of incoming communication available in each estate and mill unit.</p> <p>The request for information was recorded on Log Book “<i>Surat Masuk dan Keluar</i>” on period 2022, sample taken:</p> <ul style="list-style-type: none"> • On February 10, 2022, request for information from the Head of Pangkalan Kerinci sub-district letter no. 800/UM/2020/40, regarding the invitation for the 2022 population census coordination meeting and was responded to on 10 February 2022. • On March 3, 2022, request for information from the Majelis Talim Al Mukhlisin letter No. 002/MT/III/2022 regarding loaning of bus, has been responded to on March 3, 2022 by the Plantation Manager. <p>Smallholder Scheme</p> <p>Request Information and response from Stakeholder is documented log book “<i>Kebun Plasma Buatan</i>”, up to May 2022, there was 9 information requests in Plasma/smallholder Division, mostly request EFB for fertilizer in scheme smallholder area. Based on procedure stated that responds for information request within 14 days.</p> <p>Sample taken:</p> <ul style="list-style-type: none"> • On 16 February 2022, request for information from KUD Makarti Sawit 	
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		<p>letter No. 60/KUD-MS/II/2022, regarding the replanting socialization and has been responded to on 16 February 2022, which will be carried out on February 20, 2022.</p> <ul style="list-style-type: none"> On 1 April 2022, request information from the KUD Bina Mulia letter no. 174/KUD-BM/IV/2022, regarding the addition of TBS Plasma transportation. Responded 1 April 2022. <p>Based on the sample above that request response information has been taken in accordance with the procedures that have been set.</p>	
1.1.5	An up-to-date list of contacts and detailed stakeholder information is available along with designated representatives.	<p>Buatan II POM, Estate and Scheme Smallholder:</p> <p>PT IIS - Buatan Group Stakeholder has maintained list of stakeholder update on May 2022. The List of stakeholders consists of several types of stakeholders based on regional levels: village, provincial and national districts (81 stakeholders), including NGO, for example: FSP NIBA KSPSI, LPAI (Lembaga Perlindungan Anak dan Ibu) and LCKI (Lembaga Cegah Kejahatan Indonesia).</p> <p>The list of stakeholders presented in detail about the address, name of person and phone number and also position and title, the list is including of regent of Pelalawan, Environment Agency, Social Office & Workers of Pelalawan Regency, Camat Kerinci Kanan, Head of Village Mekar Jaya and Head of Village Makmur etc.</p>	Complied
Criteria 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.	<p>The company has a corporate policy set on 1 December 2019 in Medan which was ratified by the Managing Director (Kevin Tio). The company's policy confirms the code of Conduct behaviour in business at point 2) of the stated the conduct of fair and ethical business on all transactions and business operating, including the prohibition of all forms of corruption, bribery and fraud in the use of funds and resources.</p> <p>In the employee selection process, the company has sets policies related the conduct of business ethics in the daily worker agreement (<i>Perjanjian</i></p>	Complied

		<p><i>Kerja Harian Lepas</i>), which is stated in the appendix to corporate policies and behaviours that must be complied with. PKB is a joint working agreement for permanent workers, also confirmed about the conduct of business ethics in article 16 related of the behaviour of the ethical business in the company.</p> <p>The company's policy is also published using posters at strategic places in the plantations (Simpang Perak Estate and Mill). Corporate policy was socialized to all levels of PT IIS – Buatan Group on 10-12 February 2022 (list of participants can be shown during audit) and to stakeholders (including local contractors) on 23-24 March 2022 which was attended by 31 stakeholders.</p> <p>Scheme Smallholder:</p> <p>All KUDs have prepared the policy of code of ethical conduct and integrity in all operation and transaction, dated 14 February 2020, which stated: <i>"Berkomitmen dalam perilaku etis dalam berbisnis dalam seluruh transaksi dan operasi bisnis, pelarangan seluruh bentuk korupsi, penyuapan dan penipuan dalam penggunaan dana dan sumber daya"</i>. This policy was communicated to the members, latest training and socialization against the policy to all Smallholder and KUD employees performed on 11 February 2022 in KUD Makarti Sawit, 18 February 2022 in KUD Mitra Usaha, on 27 February 2022 in KUD Delima Sakti and on 13 February 2020 in KUD Bina Mulia. The evidence can be demonstrated during audit such as attendant list and photograph.</p> <p>The policy written in their farmer handbook <i>"Buku Panduan Petani"</i>. The implementation of said policy in form of dissemination of anti-corruption policy, transparency in expenditure for road maintenance, fair calculation of worker payment, good quality FFB.</p>	
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.	The certificate holder of PT IIS – Buatan Group has a mechanism to monitor the implementation of company policies including the company code of ethics. GM and Public Relations provide responses to an	Complied

		<p>information/case based on the AA GL-5008.1 R1 Procedure, which for the next mechanism is based on the Settlement Procedure with the local community (Procedure No. AA-GL-5009.R1 regarding settlement with the local community, this mechanism also explain related to the reporter's guarantee and disclosure of cases or information.</p> <p>In every transaction resulting from the work that has been completed, Buatan II Group has a mechanism to monitor business ethics policies, for example: in each work completion, a "<i>Berita Acara Penyelesaian Pekerjaan</i>" which has been verified by the Field Assistant and known by the Estate Manager must be made both inti and plasma plantations (smallholders).</p> <p>PT IIS - Buatan II Group also conducted an internal audit to ensure that the company's policies were implemented properly, the last internal audit was carried out on 9 – 14 May 2022.</p>	
<p>Principle 2: Operate legally and respect rights Implement legal requirements as the basic principles of operation in any jurisdiction.</p>			
<p>Criteria 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.</p>			
2.1.1	<p>(C) The unit of certification complies to relevant regulations.</p>	<p>PT Inti Indosawit Subur – Buatan II POM has demonstrated the evidence of compliance with relevant legal requirement as in "Evaluasi Kepatuhan Hukum PT Inti Indosawit Subur – Buatan unit Pabrik dan Kebun". All legal requirements comply with the regulations and laws, including those related to land status, occupational health and safety, environmental, labour, agricultural practice, and mill operation, such as:</p> <ol style="list-style-type: none"> 1. Ijin Prinsip (Principle permit) No.KB.320/859/Mentan/XI/1983 dated 7 November 1983 from Agriculture minister (65,000 Ha). 2. Ijin lokasi (Location Permit) No.KPTS.57/II/1987, dated 4 February 1987 for 32,000 Ha. 3. Ijin Pelepasan kawasan from Forestry Ministry (Release forest 	Complied

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		<p>permit) No.664/Kpts-II/89, dated 31 October 1989.</p> <ol style="list-style-type: none"> 4. Ijin pembukaan lahan (land clearing permit) No.1536/II/KW-6/1988, dated 2 November 1988 from Forestry Ministry Region Riau Province. 5. Surat Keterangan Pendaftaran Tanah (Land register) from land authority of Pelalawan District No.15/SKPT/X/2004, dated 30 September 2004. 6. Surat Pendaftaran Usaha perkebunan (SPUP) from Forestry and Plantation Ministry, No.185/Mentanhut/VII/2000, dated 3 November 2000. 7. SK. HGU (Land Title), approved by "Menteri Negara Agraria/Kepala BPN No.10/HGU/1993, dated 13 May 1993 tentang Pemberian HGU atas nama PT. Inti Indosawit Subur, atas tanah di Kabupaten Kampar seluas 5,781.47 Ha". 8. HGU (Land titles) No.01, 1993, dated 19 June 1993. for Buatan Estate (5,781 Ha); 9. Renewal land title No.145/HGU/BPN/2004, dated 3 November 2004. Expired until 2058 from Head of BPN (5,781 Ha); 10. IMB (Building licenses), there were 6 permits, such as; No.106/2009, 71/2009, 09/2009, 11/1992, 56/2009, 117/1997. 11. IMB for Buatan II Mill was issued by Dinas Pekerjaan Umum Pelalawan Regency on 16 January 1997 no. 117/IMB/PU.CK/I/1997. 12. AMDAL (Environmental and Social impact assessment), SEIA No.013/ANDAL/BA/V/95, dated 3 May 1995, by Agriculture of Ministry. 13. Revised AMDAL (Dokumen Pengelolaan dan Pemantauan lingkungan) approved by Governor of Riau No.KPTS 975/X/2009, dated 28 October 2009. 14. Surface water usage permit from Dinas Pertambangan dan Energi, Kabupaten Pelalawan No.14/KPTS/M/2018, dated 5 January 2018 	
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		<p>(valid until 4 January 2023).</p> <p>15. Liquid waste utilization permit (Land Application) issued by Dinal Lingkungan Hidup Pelalawan Regency on 10 September 2014 no. KPTS.660/BLH/781/2014 valid until 9 October 2019.</p> <p>16. Machinery permit in Mill is available. Mill machineries permit:</p> <ul style="list-style-type: none"> ▪ Permit for Sterilizer reference number: #027-029/BU/PL/2005, issued on 27 June 2005 for capacity 3.25 kg/cm²; Sterilizer 4, no. 03/B.0302, issued on 18 June 2005 has been inspected by official inspector (PT Jesindo Mandiri) and approved by labor agency of Riau Province on 22 April 2019. ▪ Tera measurement for weighbridge 1 and 2 issued by Badan Metrologi Pelalawan Regency ref no. 510.3/UPTMET/SKHP/2018/104 and no. 510.3/UPTMET/SKHP/2018 /105 dated 15 October 2018 and will be tera on 14 October 2019. ▪ Permit for Back Pressure Vessel reference number: 56/BU/PK/VII/2018 issued on 25 July 2018 for capacity 3.5 kg/cm², will be inspections on 24 July 2020. ▪ Permit for Boiler reference number: 008/KU/PLLWN/2003 issued on 25 June 2005 for capacity 24 kg/cm²; reference number: 036/KU/PLLWN/2003 issued on 25 June 2005 for capacity 24 kg/cm²; reference number: 560/KU/PL/2015/002 issued on 7 July 2005 for capacity 24 kg/cm² and will be inspection on 9 June 2020. ▪ Permit for Diesel engine (Genset), reference number: 064/M-MD/PLLWN/2003 and 084/M-MD/PLLWN/2003 issued on 27 June 2005 for capacity 420 horsepower each and will be inspection on 30 October 2019. 	
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		<ul style="list-style-type: none"> ▪ Permit for Compressor, reference number: 012/BT/PLLWN/2003 issued on 25 June 2005 and will be inspection on 30 October 2019. ▪ Permit for Turbine, reference number: 085/M-MD/PLL/2005 issued on 27 June 2005 for capacity 1.200 KW; and will be inspection on 30 October 2019. <p>Scheme Smallholder: Group manager and ICS conducted the evaluation of laws and regulation compliance each year. Latest updated was on 1 January 2022. During audit, Group manager can demonstrate the document of "Evaluasi Kepatuhan Hukum Kebun Plasma Buatan Tahun 2022" which contain the list/'legal register' of all applicable laws and regulations; consist of: list of regulation, requirement, evaluation record, compliance status, type of document, no. document, validity, source of document, remark. Some example showing compliance to relevant regulation of land tittle, cooperative legal.</p>	
2.1.2	A documented system for ensuring legal compliance is in place. This system has means to track changes to the law and also includes listing and evidence on evaluation of legal compliance of all contracted third parties, such as: recruitment agencies, service provider and labour contractor.	Public affair department has conducted annual evaluation of legal compliance. The last evaluation was on February 2022. Based on the evaluation document obtained information that there are 7 (seven) new regulation related to plantation business. For example, Government Act No. 36 year 2021 related to payments. According to the evaluation, the company has complied with the regulation. Another regulation that has been evaluated was Presidential Regulation No. 44/2020 and Agricultural Minister Decree No. 38/2020 related to Indonesian Sustainable Palm Oil (ISPO).	Complied
2.1.3	Legal or authorized boundaries are clearly demarcated and visibly maintained and there is no planting beyond these legal or authorized boundaries.	According to the national regulation, land title (HGU) holder shall maintain the condition of boundary poles. Based on field visit in Estate concluded that the boundary poles area well maintained. For example: <ul style="list-style-type: none"> • Boundary poles BPN 16 Block B89b Afdeling III 	Complied

		<ul style="list-style-type: none"> • Boundary poles BPN 17 Block B89b Afdeling III • Boundary poles BPN 20 Block C89i Afdeling IV • Boundary poles BPN 22 Block D89d Afdeling IV <p>The boundary poles recorded in document "<i>Monitoring Pemeriksaan Patok Batas</i>". The poles monitored twice a year. The last monitoring held in May 2022. All poles (59 unit) reported in good condition.</p> <p>Scheme Smallholder:</p> <p>During this audit, auditor team has visited the smallholder sample from KUD Mulus Rahayu, Mitra Usaha, Makarti Sawit and Bina Mulia. All smallholder plots were equipped with boundary poles. All boundary poles were in a good condition. Based on the interview with the smallholder and board of KUD's, there is no land dispute issues.</p>	
Criteria 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.			
2.2.1	A list of contracted parties is available.	<p>Certificate holder has a list of contractors in mill and estate. Some of the contract as follows:</p> <ol style="list-style-type: none"> 1. School Bus on behalf of Sri Rahayu (Contract No. 008/E2KBN/01/2020 dated 1 January 2020). 2. FFB transporter on behalf of Wongso Santoso (Contract No. 009/E2KBN/01/2020 dated 1 January 2020). 3. FFB/EFB transporter on behalf of Parlaungan Panjaitan (Contract No. 010/E2/KBN/01/2020 dated 1 January 2020). 4. CPO, PK and CPKO Transporter on behalf PT Wijaya Multi Prima Lestari (Contract No. SPK No. 05/VI/W/W MPL-IIS/2020 dated 4 June 2020). 5. CPO, PK and CPKO Transporter on behalf CV Trans Cargo Logistic (Contract No. 01/VI/tCL-IIS/2022, dated 6 June 2022). 6. CPO, PK and CPKO Transporter on behalf CV Teman Setia (Contract No. June 2022). 	Complied

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		<p>7. CPO, PK and CPKO Transporter on behalf PT Buana Jaya Bersama (Contract No. 03/VI/BJB-IIS/2020, dated 4 June 2020)</p> <p>Scheme Smallholder:</p> <p>In smallholder activity, FFB transport from their land to mill by using the association of FFB-Transporter (usually smallholder members that owned truck). For example, sighted the annual FFB-Transporter contract between:</p> <ul style="list-style-type: none"> - KUD Tani Rukun with H Abdul M Siregar (FFB Transporter) Kampung Simpang Perak Jaya Village, Kerinci Kanan Sub District, Siak District, Agreement No. 11/KUD-TR/12/2016 dated 30 December 2016. - KUD Mulus Rahayu with Pawito (FFB Transporter) Delima Jaya Village, Kerinci Kanan Sub District, Siak District, Agreement No. 08/P2/KUD-MRI/01/2021 dated 03 January 2022. - KUD Sawit Makarti with Saker (FFB Transporter) Buana Makmur Village, Kerinci Dayun Sub District, Siak District, Agreement No. 11/KUD-MS/I/2018 dated 02 January 2018. - KUD Mitra Usaha with Sugianto (FFB Transporter) Buatan Baru Village, Kerinci Kanan Sub District, Siak District, Agreement No. 01/KUD-MU/VIII/2021 dated 18 August 2021. <p>All contract was verified by the auditor. Based on the interview with the contractor, all working agreement has covered the issues such as occupational safety and health, no underage worker and payments. There were no dispute issues so far.</p>	
2.2.2	All contract, including those for FFB supply, contain specific clause on meeting relevant legal requirements and this can be demonstrated by the third party.	<p>FFB supplier for Buatan II POM are from Simpang Perak Estate, KKPA Delima Sakti, and Scheme Smallholders (KUD Mulus Rahayu, KUD Bhirawa Bhakti, KUD Tani Rukun, KUD Kebun Sawit Harapan, KUD Buatan Jaya, KUD Mitra Usaha, KUD Makarti Sawit and KUD Bina Mulia).</p> <p>According to Asian Agri’s policy regarding to traceability, they have conducted traceability project to verify their supply chain. Refer to</p>	Complied

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		<p>sustainability report 2017 – 2018 that can be downloaded in https://www.asianagri.com/images/pdf/2019/Asian%20Agri%20Sustainability%20Report%202017-2018.pdf stated:</p> <p>Certificate holder has a list of contractors in mill and estate, such as: School Transportation on behalf of Sri Rahayu, FFB transporter on behalf of Wongso Santoso and Parlaungan Panjaitan, CPO, PK and CPKO Transporter on behalf PT Wijaya Multi Prima Lestari, CV Trans Cargo Logistic, CV Teman Setia, PT Buana Jaya Bersama.</p> <p>All contract, including those for FFB supply, have contained specific clauses to meet the relevant legal requirements, that has been mentioned in the contract agreement in Chapter 7 “Tanggung Jawab dan Kewajiban” which has explained the contractor’s responsibilities to meet legal requirement such as being willing to pay according to the wages set by the government, not employing child labor and not performing forced labor.</p> <p>According to the interview with PR Staff of Buatan Group, FFB-CPO-PK contractors informed that all the contractor/smallholders or independent supplier has meet to the relevant regulation. There are no land dispute issues from the village representative or related government agencies obtained, and there is no issues related to forced labor, child labor, payment and condition.</p>	
2.2.3	All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour.	<p>FFB supplier for Buatan II POM are from Simpang Perak Estate, KKPA Delima Sakti, and Scheme Smallholders (KUD Mulus Rahayu, KUD Bhirawa Bhakti, KUD Tani Rukun, KUD Kebun Sawit Harapan, KUD Buatan Jaya, KUD Mitra Usaha, KUD Makarti Sawit and KUD Bina Mulia).</p> <p>Certificate holder has a list of contractors in mill and estate, such as: School Transportation on behalf of Sri Rahayu, FFB transporter on behalf of Wongso Santoso and Parlaungan Panjaitan, CPO, PK and CPKO Transporter on behalf PT Wijaya Multi Prima Lestari, CV Trans Cargo</p>	Complied

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		<p>Logistic, CV Teman Setia, PT Buana Jaya Bersama. The contract has completed with some important clause such as:</p> <ul style="list-style-type: none"> • The company policy related to children/underage worker, anti-drugs etc. • Workers payment referred to local minimum payment's regulation. • All worker will be register in health insurance and workers insurance according to national regulation. <p>The same regulation also implemented in smallholder scheme. All of contract data kept by Head Clerk in estate and mill.</p> <p>All contract, including those for FFB supply, have contained specific clauses to meet the relevant legal requirements, that has been mentioned in the contract agreement in Chapter 7 "Tanggung Jawab dan Kewajiban" which has explained the contractor's responsibilities to meet legal requirement such as being willing to pay according to the wages set by the government, not employing child labor and not performing forced labor.</p> <p>According to the interview with PR Staff of Buatan Group, FFB-CPO-PK contractors informed that all the contractor/smallholders or independent supplier has meet to the relevant regulation. There are no land dispute issues from the village representative or related government agencies obtained, and there is no issues related to forced labor, child labor, payment and condition.</p>	
<p>Criteria 2.3: All FFB supplies from outside the unit of certification are from legal sources.</p>			
2.3.1	<p>(C) For all directly sourced FFB, Palm Oil Mill (POM) requires:</p> <ul style="list-style-type: none"> • Information regarding the geolocation of FFB origins; • Proof of ownership status, right/claim of the land by grower/smallholder; 	<p>Buatan II POM has chosen the Mass Balance Module, the supply bases as directly sourced of FFB are estates (Simpang Perak Estate), scheme smallholder (certified under Buatan II POM). The scheme smallholders are KKPA Delima Sakti, KUD Mulus Rahayu, KUD Bhirawa Bakti, KUD Tani Rukun, KUD Kebun Sawit Harapan, KUD Buatan Jaya, KUD Mitra Usaha, KUD Makarti Sawit and KUD Bina Mulia. The information related</p>	Complied

	<ul style="list-style-type: none"> If relevant, valid planting/operational/trading license, or is part of a cooperative which allows the buying and selling of FFB. 	<p>geolocation, proof of ownership status, and trading license a cooperative has shown during audit.</p>	
<p>2.3.2</p>	<p>For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in indicator 2.3.1.</p>	<p>During this audit, there are two additional supplier which is APPS Berkah Makmur Bersama (long term agreement) and CV Putra Kembar Sentosa PBD-C. Based on document verification and interview with Create Share Value (CSV) staff obtained information that both suppliers have been verified and visited by FFB purchasing staff. By visited the suppliers land and tagged the coordinate, mill expected the FFB source comes from traceable and responsible area. The list of legal documents verified as follows:</p> <ul style="list-style-type: none"> List of supplier member Coordinate and its overlay RTRW map. Personal tax identification of APPS Berkah Makmur Bersama and CV Putra Kembar Sentosa PBD-C Business permit ID. Trading permit ID. Environmental permit. Location permit Registration of health insurance (BPJS Kesehatan) Copy of bank account <p>Based on document verification report above, the CSV staff submitted the report of verification to FFB Purchase Department to issue the Agreement Letter (Surat Perjanjian Kerjasama). There is an Agreement Letter on FFB Supply No. 01/CSV-KSP/II/2020 dated 10 February 2020.</p> <p>By signed this agreement letter, APPS Berkah Makmur Bersama has officially record as FFB Supplier of Buatan II POM.</p> <p>The information related geolocation, proof of ownership status and trading licenses has shown during audit.</p>	<p>Complied</p>

Principle 3: Optimise productivity, efficiency, positive impact and resilience									
Implement plans, procedures and systems for continuous improvement.									
Criteria 3.1: There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.									
3.1.1	<p>(C) A business or management plan (minimum of three years) is documented and where applicable, includes a jointly developed business case for Scheme Smallholders.</p>	<p>Certificate holder has longterm management plan in document <i>Rencana Jangka Panjang periode 2020 – 2024</i>. This document described the five-year business projection of PT Inti Indosawit Subur. The longterm management plan covered parameter as follows:</p> <ul style="list-style-type: none"> • Planting material (Marihah, Lonsum, Damimas and Topaz) • Hectare statement of mature and immature area • Estimation of production (Tonnes) • Estimation of FFB purchase (for Mass Balance Mill) • Extraction projected (%) • Cost estimation (IDR/Kg) • Estimation of price (IDR/Tonnes) • Estimation of profit (IDR) <p>Through the document, the production of Buatan II was projected to increased. During the audit, Buatan II POM has average extraction for CPO (20.15%) and KER (5.30%) in 2022. Annual achievement always evaluated by top management.</p> <p>Based on interview with head clerk and sustainability staff, PT Inti Indosawit Subur has started to engage with independent smallholder named Create Share Value (CSV) near the Inti Indosawit Subur’s concession since a couple year ago and renewed annually.</p>	Complied						
3.1.2	<p>An annual replanting programme projected for a minimum of five years with yearly review, is available.</p>	<p>PT Inti Indosawit Subur – Simpang Perak Estate was able to demonstrate annual replanting program period 2015 – 2023 as follows:</p> <table border="1" data-bbox="1093 1326 1507 1374"> <thead> <tr> <th>Year</th> <th>Program</th> <th>Actual</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Year	Program	Actual				Complied
Year	Program	Actual							

2015	378	378
2016	580	580
2017	553	553
2018	-	-
2019	363	363
2020	465	139
2021	341	-
2022	370	-
2023	358	-

Note: data until May 2022.

Scheme Smallholder:

The replanting plan was available under "Rencana Pelaksanaan Replanting Kebun Plasma Buatan". Below is replanting program of Buatan Scheme Smallholder:

Year	Program	Actual
2019	-	-
2020	1,252	630
2021	1,268	-
2022	1,488	-
2023	1,476	-
2024	1,448	-
2025	1,146	-

		<table border="1"> <tr> <td>2026</td> <td>1,366</td> <td>-</td> </tr> <tr> <td>2027</td> <td>1,032</td> <td>-</td> </tr> <tr> <td>Total</td> <td>10,476</td> <td>630</td> </tr> </table>	2026	1,366	-	2027	1,032	-	Total	10,476	630	<p>Based on document verification and interview with management informed that the total realization of replanting in Simpang Perak Estate was 341 Ha. During the field visit obtained information that there is no fire usage during the replanting process.</p>	
2026	1,366	-											
2027	1,032	-											
Total	10,476	630											
3.1.3	<p>The unit of certification holds management review at planned term according to the scale and nature of the activities undertaken.</p>	<p>Estate: The company has annual internal audit activity namely Visit Agronomy (VA) and Visit Engineering (VE). Simpang Perak Estate: Report No. VA/KSP/FEB/FULL/01-22 dated 31 January - 5 February 2022. There were some issues in this estate, for example flatbed land application found shallow, broken owl cage and uneven growth of legume cover crops. The Estate has made a corrective action plan and the issues has been closed in May 2022.</p> <p>Buatan II POM: Report No. VE-PBD-FEB-FULL-01-2021-Full Report, date of visit 01 – 10 February 2021. There were no main issues in this estate. However, there is issue related to the cake press and the press machine floor condition at press and digester station are dirty with sludge piles due to there is no press cake washing water pipe installed. The unit has made a corrective action plan and the issues has been closed in April 2021.</p> <p>Scheme smallholders: Report Visit Agronomy that conducted by Coordinator of Smallholder on 11 January 2022 based on the report there is an issue related to the loose</p>	<p>Complied</p>										

		fruit is not quoted by the farmers. The unit has made a corrective action plan and the issues has been closed in April 2022.	
Criteria 3.2: The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.			
3.2.1	(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impact and opportunities of the unit of certification.	<p>Certificate holder has conducted several trainings to empowering independent smallholder through one day coaching clinic namely <i>Pelatihan Dinamika Kelompok Kebun Plasma Buatan (KLB)</i>. The last has been held on 4 March 2022 and attended by 30 participants (villagers surrounding concessions area).</p> <p>During onsite audit obtained information related to improvement in smallholder management by using Android Apps namely "Pembina Sejati". This android apps are very useful for smallholder staff and smallholder itself to reporting the daily activity such as harvesting, upkeep and replanting. This apps intended to increase transparency and trust between smallholder and management unit.</p> <p>In addition, the management of Kebun Plasma Buatan has conducted the annual schedule of awareness/socialization and refreshment training to updating smallholder's knowledge and awareness related palm oil sustainability. For example:</p> <ul style="list-style-type: none"> • Sustainability awareness, first aid and integrated pest management training on 4 March 2022 located in meeting room of Plasma Buatan. This training attended by 20 representatives participant from smallholder. • Basic fire training, Occupational Safety and Health and HCV management training on 13 February 2022, located in meeting room Buana Bakti Village. Due to Covid 19 pandemic, the attendance is limited to the representatives from respective KUD's, which is only 25 participants. 	Complied

		<p>Buatan II Palm Oil Mill has an action plan for Continuous improvement: optimizing EFB press waste as a boiler fuel, reduce oil losses on press fibre, reduce oil losses on heavy phase, reduce oil losses on empty fruit bunch, and improve quality outside FFB. The improvement plan has been implemented and well monitored.</p> <p>Simpang Perak Estate has an action plan for Continuous improvement: reducing cost for loose fruit picked up by separating loose fruit picked system. This system has been implemented and well monitored. Beside that Simpang Perak Estate has an improvement of riparian enhancement by planting the local trees along the riparian and protect the riparian zone from chemical application.</p>	
3.2.2	As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat by Certification Body during Annual Surveillance Assessment by using the RSPO metrics template.	<p>RSPO Annual Communication of Progress 2020 of PT Inti Indosawit Subur has been available in RSPO website under membership number 1-0022-06-000-00. The report has been submitted on 4 June 2020.</p> <p>PT. Inti Indosawit Subur Buatan II POM and its supply base has provided filled up/completed RSPO metrics template using the new template.</p>	Complied
Criteria 3.3: Operating procedures are appropriately documented, consistently implemented and monitored.			
3.3.1	(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.	<p>Estate:</p> <p>Estate has had Standard Operational Procedures (SOP) that covering entire operational activity as follows:</p> <ul style="list-style-type: none"> • SOP AA-APM-OP-1100.01-R4 dated 5 September 2016: <i>Pembibitan</i> (Nursery). • SOP AA-APM-OP-1100.02-R3 dated 10 June 2015: <i>Penanaman Areal Baru</i> (New Planting). • SOP AA-APM-OP-1100.03-R2 dated 24 July 2015: <i>Pembuatan dan Perawatan Jalan dan Jembatan</i> (Road and Bridge construction and maintenance); • SOP AA-APM-OP-1100.04-R3 dated 7 Decmeber 2015: <i>Pembuatan</i> 	Complied

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		<p><i>dan Pemeliharaan Parit</i> (Drainage Construction and Maintenance).</p> <ul style="list-style-type: none"> • SOP AA-APM-OP-1100.05-R3 dated 23 November 2016: <i>Konservasi Tanah dan Air</i> (Soil & Water Conservation). • SOP AA-APM-OP-1100.06-R6 dated 16 February 2017: <i>Menanam kacang</i> (Planting cover crops). • SOP AA-APM-OP-1100.07-R6 dated 16 February 2017: <i>Menanam Kelapa Sawit</i> (Planting Oil Palms). • SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i> (Weed control). • SOP AA-APM-OP-1100.09. R5 dated 26 December 2018: <i>Pemupukan</i> (Fertilizer application). • SOP AA-APM-OP-1100.10. R6 dated 23 November 2016: <i>Pengendalian Hama dan Penyakit</i> (Pests & Disease Control). • SOP AA-APM-OP-1100.11. R1 dated 1 February 2009: <i>Pestisida dan Pengendaliannya</i> (Pesticide Handling). • SOP AA-APM-OP-1100.12. R3 dated 23 November 2016: <i>Kastrasi</i> (Palm castration) explain cutting all generative product (mal flower, female flower, all fruit, to support vegetative growth) – done 5-6 months before being harvested. • SOP AA-APM-OP-1100.13. R3 dated 4 March 2016: <i>Tunas Pokok</i> (Pruning). • SOP AA-APM-OP-1100.14. R3 dated 16 February 2017: <i>Sensus dan Identifikasi Pokok</i> (Census and Palm Identification). • SOP AA-APM-OP-1100.15. R2 dated 1 October 2010: <i>Sensus Produksi</i> (Production Census). • SOP AA-APM-OP-1100.16. R1 dated 1 February 2009: <i>Konsolidasi Pohon Tumbang</i> (Provision of Support to Fallen Palm). • SOP AA-APM-OP-1100.17. R1 dated 23 October 2014: <i>Pengelolaan Air</i> 	
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		<p>(Water Management).</p> <ul style="list-style-type: none"> • SOP AA-APM-OP-1100.18.R3 dated 20 April 2015: <i>Potong Buah</i> (Harvesting). • SOP AA-APM-OP-1100.19.R1 dated 1 February 2009: <i>Pengelolaan Transport</i> (FFB Transport). • SOP AA-APM-OP-1100.20-R6 dated 1 May 2019: <i>Peremajaan</i> (Replanting). <p>Buatan II POM has documented and implemented procedure related to process of FFB to become CPO and PK, starts from FFB receiving to dispatch of CPO and PK:</p> <ol style="list-style-type: none"> 1. SOP AA-MPM-OP-1400.02.R2 dated 1 September 2011: <i>Stasiun Penerimaan</i> for FFB Receiving Station; 2. SOP AA-MPM-OP-1400.03.R1 dated 1 February 2009: <i>Stasiun Rebusan</i> for Sterilizer; 3. SOP AA-MPM-OP-1400.04.R1 dated 1 February 2009: <i>Stasiun Pemisahan Berondolan</i> for Loose Fruit Separation; 4. SOP AA-MPM-OP-1400.05-R1 dated 1 February 2009: <i>Stasiun Pengadukan dan Pengempaan</i> for Pressing Station; 5. SOP AA-MPM-OP-1400.06-R1 dated 1 February 2009: <i>Stasiun Pemurnian</i> for Clarification; 6. SOP AA-MPM-OP-1400.07-R1 dated 1 February 2009: <i>Stasiun Pemisahan Nut dan Fiber</i> for Nut and Fiber Separation; 7. SOP AA-MPM-OP-1400.08-R1 dated 1 February 2009: <i>Stasiun Kernel</i> for Kernel Station; 8. SOP AA-MPM-OP-1400.09-R1 dated 1 February 2009: <i>Stasiun Boiler</i>; 9. SOP AA-MPM-OP-1400.10-R1 dated 1 February 2009: <i>Stasiun Engine Room</i>; 	
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		<p>10. SOP AA-MPM-OP-1400.11-R1 dated 1 February 2009: <i>Stasiun</i> Water Treatment;</p> <p>11. SOP AA-MPM-OP-1400.12-R1 dated 1 February 2009: Laboratorium;</p> <p>12. SOP AA-MPM-OP-1400.13-R1 dated 1 February 2009: <i>Stasiun Pengelolaan Limbah</i> for Palm Oil Mill Effluent Treatment;</p> <p>13. SOP AA-MPM-OP-1400.14-R2 dated 1 September 2011: <i>Stasiun Penimbunan dan Pengiriman CPO dan Kernel</i> for CPO and PK Bulking and Despatch Operation;</p> <p>14. SOP AA-MPM-OP-1400.15-R1 dated 1 February 2009: <i>Perawatan</i> for Preventive Maintenance;</p> <p>15. SOP AA-MPM-OP-1400.19.R2 dated 1 September 2011: <i>Manajemen dan Metode Menghitung Emisi Gas Rumah Kaca</i> (GHG)</p> <p>16. SOP AA-MPM-OP-1400.18-R4 Book Keeping</p> <p>17. AA-MPM-OP-1400.17-R6 Traceability</p> <p>Those documents above are available in each unit.</p> <p>Scheme Smallholder: Scheme smallholder has had best management practices procedure as follows:</p> <ul style="list-style-type: none"> • AA-PLASMA-PP-KS-01 <i>Pembibitan</i> (Nursery) • AA-APM-OP-1100.09-R3 <i>Pemupukan</i> (Manuring) dated 20 April 2015 • AA-PLASMA-PP-KS-04 <i>Potong Buah</i> (Harvesting) • AA-PLASMA-PP-KS-05 <i>Pengangkutan TBS</i> (FFB Transport) • AA-APM-OP-1100.10-R5 <i>Pengendalian Hama dan Penyakit</i> (Pest and Disease Control) dated 11 January 2016 • AA-APM-OP-1100.20-R5 <i>Peremajaan</i> (Replanting) dated 4 March 2016 	
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		<ul style="list-style-type: none"> • AA-MM-508-1-RO <i>Penerimaan TBS Plasma</i> (FFB Plasma Receiving) 1 September 2015 • AA-MM-508-2-RO <i>Penentuan Taksasi TBS Plasma</i> (FFB Plasma Estimation) • AA-APM-OP-1100.8-R5 <i>Pengendalian Gulma</i> (Weed Control) • AA-FA-220-2-RO <i>Stempel (Stamp)</i> • AA-MPM-OP-1400-17-R6 <i>Ketertelusuran</i> (Traceability) dated 1 September 2017 • AA-APM-OP-1100.02-R3 <i>Penanaman Area Baru</i> (New Planting) • AA-SOP-ES-6001-R4 <i>Audit Internal Sustainability</i> (Internal Audit Sustainability) • AA-KL-12-EFP <i>Restorasi Riparian dan Areal di Sekitar Danau/Waduk dan Mata Air Lainnya</i> (Restoration of Riparian Area or Near Area of Lake/Damp or Water Sources) dated 1 August 2010 • AA-HR-305.2-RO <i>Rekrutmen dan Seleksi Karyawan</i> (Recruitment and Selection of Employee). <p>During onsite audit, auditor has conducted field visit to the Buatan Estate as follows:</p> <ul style="list-style-type: none"> • Harvesting in Simpang Perak Estate at Block A15k Afdeling I and KKPA Delima Sakti Block G03N Afdeling VII. The implementation was good, the harvester can demonstrate the best management practices for harvesting and also safety working procedure. • Barn owl box Block A15l Afdeling I. The management unit using natural predator to control rat infestation. According to the interview, there are 4 barn owl boxes to covering 680 Ha of Afdeling I. 	
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		<ul style="list-style-type: none"> • Upkeep activity at Simpang Perak Estate A15f Afdeling I, based on interview with the workers, they have carried out the upkeep procedure well. • Chemical weeding Block B91a Afdeling II. Chemical weeding in circle and path by using herbicide with active ingredients isopropyl amine glyphosate and metil metsulfuron. The spraying activity using VVLV (very very low volume) sprayer to minimize the herbicide usage. • Fertilizer application Block C18a Afdeling II. According to fertilizer recommendation, Buatn Estate conducted fertilizer application using TSP with dosage 0.6 kg/palm. The fertilizer applicator can demonstrate the application and safety working procedure. <p>EFB application Block B19c Afdeling I. Unit management using EFB in immature palm to enrich the soil fertility, maintain soil moisture and reducing weeding especially in circle. EFB placing in each palm circle with dosage 27 ton/Ha or equal to 200 – 250 kg/palm.</p>	
3.3.2	A mechanism to check consistent implementation of procedures is in place.	<p>A mechanism to check consistent implementation of procedures company has had annual internal audit activity namely Visit Agronomy (VA) and Visit Engineering (VE).</p> <p>Simpang Perak Estate: Report No. VA/KSP/FEB/FULL/01-22 dated 31 January - 5 February 2022. There were some issues in this estate, for example flatbed land application found shallow, broken owl cage and uneven growth of legume cover crops. The Estate has made a corrective action plan and the issues has been closed in May 2022.</p> <p>Buatan II POM: Report No. VE-PBD-FEB-FULL-01-2021-Full Report, date of visit 01 – 10 February 2021. There were no main issues in this estate. However, there</p>	Complied

		<p>is issue related to the cake press and the press machine floor condition at press and digester station are dirty with sludge piles due to there is no press cake washing water pipe installed.</p> <p>The unit has made a corrective action plan and the issues has been closed in April 2021.</p> <p>Scheme smallholders:</p> <p>Report Visit Agronomy that conducted by Coordinator of Smallholder on 11 January 2022 based on the report there is an issue related to the loose fruit is not quoted by the farmers. The unit has made a corrective action plan and the issues has been closed in April 2022.</p>	
3.3.3	Records of monitoring and any actions taken are maintained and available.	<p>Certificate holder conducted monitoring of operational activity in all level of workers. Each field supervisor has equipped with monitoring sheets/worksheets. For example, harvesting supervisor collected harvesting record and quality of each harvesters. The report submitted to estate manager daily. Therefore, daily operational activity also recorded in daily worksheet by mill supervisor before reported to the mill manager.</p> <p>To ensuring the result of operational activity in line with the procedures, mill/estate manager conducted regularly monitoring of and management review to solve the findings issues. All results of management review is implemented by respective staff.</p>	Complied
<p>Criteria 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.</p>			
3.4.1	(C) SEIA in new planting or operation including mills, is conducted independently and participatively by involving the affected stakeholders, inclusive of impact assessment from the smallholder/outgrower scheme (if any). The assessment is to be documented.	<p><u>Environmental Impact Assessment (EIA):</u></p> <p>Environmental impact assessment are available under documents, i.e:</p> <ul style="list-style-type: none"> PT. Inti Indosawit Subur – Buatan Group has demonstrated a document of, tentang Studi Analisis Dampak Lingkungan (ANDAL) Perkebunan Kelapa Sawit Pola PIR-Transmigrasi dan Pabrik Minyak 	Complied

		<p>kelapa Sawit (PMKS) di Kabupaten Kampar, Indragiri Hulu dan Bengkalis, Propinsi Riau, mill capacity 30 tonnes FFB/hours.</p> <ul style="list-style-type: none"> • PT. Inti Indosawit Subur – Buatan Group has demonstrated a document Environmental Management and Monitoring Document “Dokumen Pengelolaan dan Pemantauan Lingkungan” year 2009. The document was approved by Governor of Riau through “Surat Keputusan Gubernur Riau No.Kpts.975/X/2009 tentang Penetapan Dokumen Pengelolaan dan Pemantauan Lingkungan Penambahan Kapasitas Produksi Pabrik Minyak Kelapa Sawit PT. Inti Indosawit Subur dan Kegiatan Pendukungnya, Sentral Workshop Buatan dan Pembuatan Laboratorium Kultur Jaringan Berlokasi di Kecamatan Pangkalan Kerinci dan Kecamatan Pelalawan, Kabupaten Pelalawan; Kecamatan Kerinci Kanan dan Kecamatan Dayun, Kabupaten Siak, Provinsi Riau” – dated 28th September 2009. Mill capacity 60 tonnes FFB/hour. • Kernel Crushing Plant and Biogas Plant; the EIA is available under document “UKL-UPL (Environmental Management Effort / Environmental Monitoring Effort)” year 2012. Capacity of KCP 260 MT/day. UKL UPL has been approved by Local authorities through letter No.660/BLH-AM/2012/202 dated February 2012. Identified impacts: domestic solid waste, POME, hazardous waste, emission, dust, and noise from KC activities. • KUD (cooperative) holds a set of copy of latest AMDAL documents in the Cooperative office, similar company. EIA of scheme small holder has been covered by the “Dokumen Pengelolaan dan Pemantauan Lingkungan”, for mill with capacity 60 tonnes FFB/hour, Own Estate 5,781 hectares, and Plasma 12,000 hectares. The EIA (DPPL) has met the applicable requirement and has been approved on 2009 through Governor Decree number Kpts.975/X/2009 dated 28th October 2009. 	
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		<p>The environmental impact assessment carried out by PT. Holistika Primagrahita with team consist of:</p> <ul style="list-style-type: none"> • Team leader: Ir.Nur Iskandar (Fisheries/AMDAL B) • Physic/Chemical team: Azni Hamzah, S.Si (Chemical/AMDAL B) • Biology team: Khairunnazmi, S.Pi (Aquatic biology/AMDAL B), Marualat Harahap (Agriculture/AMDAL B) • Activity: Marualat Harahap (Agriculture/AMDAL B) • Social team: Yandra Mufialdo, S.Sos (Social economy) • Mapping: M. Irsyadul Anwar, S.Pi <p>All significant impacts have been identified e.g: reduction of soil and water quality, reduction of air quality, impact to socioeconomic of local community, etc. Plan to monitor and manage of each identified environment impact have been provided and documented. The EIA document contained evidence of involvement of surrounding community during study and public consultation with relevant stakeholder.</p> <p>The impact assessment for replanting has identified impacts such as: changes in micro-climate, a decrease in air quality, increase in noise level, quantity and quality of surface water, soil erosion and sedimentation, loss of flora and fauna, disturbance to aquatic biota, community health and surrounding environment health.</p> <p>The document has also completed with environmental management and monitoring plan. The plans were explaining type of impact, source of impact, impact parameter, management purpose, management and monitoring plan, management/monitoring location, management/monitoring timeframe.</p> <p><u>Social Impact Assessemnt (SIA)</u></p> <p>PT Inti Indosawit Subur – Buatan POM has also shown the document of Social Impact Assessment PT Inti Indosawit Subur Kebun Buatan in</p>	
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		<p>Kabupaten Siak and Kabupaten Pelalawan Propinsi Riau, in 2009 by Fakultas Kehutanan Institut Pertanian Bogor.</p> <p>Assessment of aspects of social impacts was done by several methods, including:</p> <ul style="list-style-type: none"> • Focus Group Discussion (FGD) • Deep interview • Structured Interviews <p>During preparation for Social Impact assessment team and company management have involved communities through interviews and meetings with village peoples, farmers, village officials and regency officials. Record of meeting with affected parties and stakeholder are available and can demonstrated. Evidence of participation with affected parties is to use a questionnaire conducted on 13- 19 April 2009, questionnaires can be demonstrated at the time of the audit.</p>	
3.4.2	<p>For the unit of certification, a SEIA is available and social and environmental management plan and its monitoring have been developed with participation of affected stakeholders.</p>	<p>PT Inti Indosawit Subur – Buatan II POM has prepared the plan for management and monitoring of environmental and social impacts to avoid or reduce negative impacts and promote positive ones presented in “Rencana Kelola Dampak Sosial dan Rencana Pemantauan Dampak Sosial year 2021-2022”. The plan consisted of:</p> <ul style="list-style-type: none"> • Farmers still lack understanding regarding internal control system (ICS) - level of understanding is about 75%, management plans: conducting training programs related to understanding the ICS and RSPO. • Misunderstanding of Sorting FFB at fruit collection sites (TPH) between farmers and Mill, management plan: Socialization to farmers related to regulation of Permentan no. 14/2013 concerning the “Pelaksanaan sortasi”. • Impact of dust on the dry season caused by FFB transport activities to the mill, management: the company performs scheduled watering every day in the morning and evening. 	Complied

		<ul style="list-style-type: none"> • Scheme smallholder PIR Plasma faces constraints in income generation in the face of replanting, management: coaching on other farming, cooperation in replanting and engage scheme smallholder in the work of replanting. <p>In 2021 and 2022, the environmental management plan was explaining the review and evaluation upon impact from operational activity that has been performed and activity that was going to be performed.</p> <p>Evaluation upon impact from ongoing activities such as:</p> <ul style="list-style-type: none"> • Impact from main activities in oil palm plantation (spraying activity, natural vegetation conservation) • Impact from main activities in palm oil mill (utilization of palm oil mill manpower, FFB processing, palm oil mill effluent management, land application of palm oil mill effluent, application of empty fruit bunch, transport of crude palm oil, palm kernel and logistics, provision, and use of clean water). • Impact from supporting activities (energy source operation, central workshop operation, temporary hazardous waste storage, landfill operation) <p>Review and evaluation upon future activities, such as:</p> <ul style="list-style-type: none"> • Activity in tissue culture in laboratory • Replanting activity, within the replanting activity review, team has identified type of impact such as: change in micro-climate, air quality decrease, increase of noise, dynamics in quantity and quality of surface water, erosion, and sedimentation, decrease in terrestrial flora and fauna, disturbance in aquatic life, effect on community health. 	
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		<p>The document has also completed with environmental management and monitoring plan, gives description type of impact, source of impact, impact parameter, management objective, management/monitoring plan, period of management/monitoring, PIC for management/monitoring.</p> <p>For Smallholder scheme, the type of environmental impact from their oil palm plantation such as: water pollution -> control the spraying and fertilizer application, avoid spraying near water body; soil erosion -> no blanket spraying, frond stacking, degradation on wildlife -> no hunting.</p> <p>Another Environmental aspect and impact evaluation was also conducted as per "Evaluasi Aspek – Dampak Lingkungan" EMS-431-002-LT updated on 22 February 2022. Involving of smallholder and stakeholder on SEIA were evident as per "Notulen Sosialisasi Upaya Pemantauan dan Pengelolaan Dampak Sosial". Social impact assessment has included the smallholder area and pay attention to the impacts of smallholder schemes. Data verified: Form of consultation with affected parties dated 22 February 2022, e.g: Mr Met Riyanto (43 years old) – address: Jalan Lintas Timur, KM 60, Mekar Jaya Village, Mr Anisar (45 years old – address: Kerinci Kota Village), Mr Marlis (49 years old – address: Kerinci Kota Village), Mr Amat (47 years old – address: Kerinci Kanan Village).</p> <p>Social Environmental monitoring and management report reported in regular basis each semester in "Laporan Pelaksanaan Izin Lingkungan".</p>	
3.4.3	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in participatory way.</p>	<p>PT Inti Indosawit Subur and Scheme smallholder have reviewed the document of plan for management and monitoring of social impacts to avoid or reduce negative impacts and promote positive ones presented in document of – data verified during Asa 2.1, year 2022:</p> <ul style="list-style-type: none"> • "Data Laporan Review Sosial Impact Assessment (SIA) Dengan Masyarakat Semester II tahun 2021" • "Laporan Izin Lingkungan Kegiatan Perkebunan dan Pabrik Pengolahan Kelapa Sawit PT. Inti Indosawit Subur Buatan" period second semester 2021 (July – December 2021)). The report has submitted and accepted 	Complied

		<p>by relevant authorities through Environmental Electronic Report (SIMPEL) to Ministry of Environmental and Forestry, dated 10th January 2022. ID TTE: 1551798233-1744. PMKS Buatan</p> <p>PT Inti Indosawit Subur – Buatan Group has appointed the responsible person for the implementation and monitoring of EIA document is Manager (Mill, Estate and Plasma) as explained in Job Profile Manual for Manager, point 2 mentioned “Responsible on implementation of environmental permit document and monitoring each six months”</p> <p>Based on verification on Environmental management and monitoring report, confirmed that the management and monitoring plan has been well implemented accordingly. Data verified during audit ASA2.1 – year 2022:</p> <ul style="list-style-type: none"> • Air quality and noisy monitoring from FFB processing performed by emission measurement against Boiler and generator each semester, ambient air quality measurement each semester, noisy measurement (indoor and outdoor) each semester, odor measurement each semester. • Air emission quality in Buatan II POM analyze by Sucofindo Testing Laboratory. • Surface water quality and water biota monitoring to prevent and control the physic and chemist quality of surface water comply to PP Nomor 82 tahun 2001. Perfomed by wastewater quality monitoring each month, hazardous waste monitoring, land application monitoring, surface water quality monitoring each semester. Wastewater quality monitoring analyse by UPT Laboratorium Bahan Konstruksi Dinas PU & Penataan Ruang Prov. Riau. Wastewater analysis result since January – June 2022 shown comply with regulation Peraturan Gubernur Riau No. 35 Tahun 2007 & KepMENLH No. 28 tahun 2003. • Soil quality monitoring performed by soil sampling analysis in “rorak, antar rorak and lahan control”, EFB application monitoring, 	
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		<p>groundwater analysis each year. Report of analysis No. 118-10/T/ENVIRO/VI/202021</p> <ul style="list-style-type: none"> • Flora fauna monitoring performed by wildlife monitoring and monitoring the conservation area each month. • Community perception monitoring performed by community interview, employee data monitoring, interview with village head or public figure regarding their perception to company. Company has monitored the public perception through questioner each year. Questioner to public perception regarding the impact of company presence has been disseminated to surrounding community. Latest monitoring of public perception has been performed in December 2021, questioner of public perception can be demonstrated and well documented in RKL-RPL report semester II 2021 Generally public perception was positive regarding the company presence and contribution to the surrounding community. <p>Certificates of environmental analysis year 2021, such as:</p> <ul style="list-style-type: none"> • Report of analysis, no: CBT99.4.00742020.32 dated 14 December 2021, sampling type for emission air, location in Genset 01 I POM. The result shown comply with environmental regulation. The testing conducted by Accredited Laboratory - Sucofindo • Report of analysis for water quality, dated 10 December 2021. The result was shown comply with Government Regulation No 82 year 2001, class II. • Report of analysis for air ambient, dated 9 December 2021, location Buatan II POM, tested by Sucofindo. The result was shown comply with PERMENAKER No 5 tahun 2018. 	
Criteria 3.5: A system for managing human resources is in place.			
3.5.1	Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the	PT Inti Indosawit Subur – Buatan Group POM has prepared a procedure for hiring workers regulating that hiring and promotion of workers are	Complied

	<p>workers and their representatives in accordance with the applicable regulation.</p>	<p>based on skill, work experiences, and job evaluation. Procedure for worker recruitment (SDM-A-001-00) and procedure for employee assessment (HRD C-002-00) was available and mentioned there was no discrimination treatment during recruitment and promotion process. Promotion of worker will be done based on work period, annual evaluation result, and availability of position</p> <p>In the recruitment process, the company has set the standard of competence that inferred in the Position Description and Job Profile. Recruitment selection, hiring and promotion has based on skills, capabilities, qualities, and medical fitness.</p> <p>Job opportunities were communicated and given to surrounding villagers at priority where no discrimination found observed during interview and related records of workers being employed. All worker has treated equally in accordance with company regulation including rights of worker as well. The compliance in accordance with national laws has evaluated by the organization as described in criterion 2.1. Annuals performance evaluation result of worker has shown.</p> <p>PT Inti Indosawit Subur – Buatan Group POM has established mechanism related to the employees and payments of wages, including:</p> <ul style="list-style-type: none"> • SOP recruitment and employee selection No. SOP: AA-HR-305.2-R0 dated 1 February 2009 regarding "<i>penerimaan karyawan baru</i>" (recruitment and selection of employee), explained that: When candidates have passed in the process of selection, next recruitment sends the candidate in full data system averis into HR-it) to be made an agreement work (made 2 duplicate and should be sign by candidates in question. • PT Inti Indosawit Subur – Buatan II POM and Estate has issued the specific labor policy and procedures for temporary workers (PHL/PKWT); The policy and procedure are issued for each unit at PT Inti Indosawit Subur – Buatan II POM and Estate has issued the 	
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		<p>specific labor policy and procedures for temporary workers (PHL/PKWT); The policy and procedure are issued for each unit as Simpang Perak Estate and POM:</p> <p>The policy and procedure have been communicated to workers, especially to temporary workers at Buatan II POM and Simpang Perak Estate on 12nd April 2022. The procedure was explained the detail of mechanism for temporary workers recruitment, promotion of temporary workers to be permanent workers, term and condition and requirement of temporary workers in accordance with National regulation (UU No. 13 tahun 2003).</p> <ul style="list-style-type: none"> • PT Inti Indosawit Subur – Buatan II POM has established a mechanism to handle complaint from external party, as written in “<i>Mekanisme Penanganan Keluhan</i>” – complaint handling mechanism (Doc. No.SOP AA-GL- 5005-RO 01) while complaint from internal regulated under “<i>Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan</i>” – Employee’ complaint and resolution mechanism (Doc. No.SOP-AA-HR-3008-RO 05). • SOP related to the payments No. AA-FA-219.1-R1: “Pengupahan” (Wages) dated 1 January 2008. 	
3.5.2	Employment procedures are implemented and records are maintained.	<p>Employment records are well maintained by the KTU, for example:</p> <ul style="list-style-type: none"> • Worker’s promotion Simpang Perak Estate from temporary to permanent workers, based on Memorandum No. 061/HR-RO2/MEMO/SK/II/2021, dated 22 February 2022, on behalf of Mr. A*n*m as Harvester. • Employee Promotion Application Letter from PKWT (temporary) to SKU-H (permanent) on 14 January 2022 as stated by Estate Manager letter No. 11/KBN/I/2022. The letter completed with the name of the employee proposed for appointment, Assessment Results of each employee, Statement letter of each employee, Types of training that 	Complied

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		<p>have been attended by each employee, Job, and Responsibilities of each employee at the time of appointment.</p> <ul style="list-style-type: none"> Perjanjian Kerja Harian Lepas – Daily worker agreement No. 104/PKHL/PBS/V/2022 on behalf of Mr Agus Piyono (mechanic in workshop) dated 27th May 2022. This Daily worker agreement has made duplicate. Sample of letter of agreement “Surat Perjanjian Kerja”: <ul style="list-style-type: none"> No: 02/SPK/KUD-BJ/2004, namely Ayu Novita Sari – location in KUD Tani Rukun No: SK/KOP-KMR/I/2016, namely Mr Sunarmo – location in KUD Mulus Rahayu <p>Regular employee appraisals are carried out annually, which outlines the results of assessments on 10 categories such as Ability, Responsibility, Cooperation with others, hard worker, open, trustworthy/honest, discipline, timeliness in carrying out tasks, administration, and loyalty.</p>	
<p>Criteria 3.6: An Occupational health and safety (H&S) plan is documented, effectively communicated and implemented.</p>			
<p>3.6.1</p>	<p>(C) All operational activities risks assessed to identify the H&S issues. Mitigation plans and procedures are documented and implemented.</p>	<p>PT Inti Indosawit Subur – Buatan Group has established a health and safety policy under “Kebijakan Perusahaan”, updated 1st December 2019, signed by Managing Director. In point 3, the company commit to implement and maintain occupational health and safety management system in compliance with national and international applicable regulation. Point 5. Integrating social, environmental, food security, occupational health, and safety issues into operational activities, adopting best technology available, and maintain trained manpower, with skills, and motivated to improve performance through continuous improvement program.</p> <p>The policy is being displayed at in public board in Buatan II POM, in each Division Office and Simpang Perak Estate Office.</p>	<p>Complied</p>

		<p>The document of OHS Program available under "Program Manajemen K3 PMKS Buatan II - PT Inti Indosawit Subur Tahun 2022", such as:</p> <ul style="list-style-type: none"> • Established the document of hazard identification, risk assessment and its control • Meeting on safety committee/P2K3 (monthly basis) • Report of OHS committee/P2K3 (3 months bases) • Training of emergency response and preparedness (annually) • Safety briefing (daily) • Providing the PPE for all employees • Inspection on PPE usage • Training for operator in POM and workshop <p>PT Inti Indosawit Subur – Buatan II POM has also prepared the procedure to identify and prepare a risk assessment. The updating risk assessment is documented on HIRAC Buatan, dated 14 February 2022. Replanting activities are also provided in the updated risk assessment. This Risk Assessment is applicable to all Cooperatives (KUD's) within the certificate scope. The risk in smallholders is more about PPE use during their activities (harvesting and fertilizing).</p> <p>Mitigation plan to reduce and minimize the risk impact has been develop by company covering:</p> <ul style="list-style-type: none"> • Elimination of risk • Substitution of material and process • Engineering control • Administrative control • Personal protective equipment. 	
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		<p>Engineering control was implemented to prevent hearing loss, e.g. install noise reduction agent and administrative by erected signboard of noise area, as described in Risk.</p> <p>Administration control was performed by employee mutation/rotation, sanction for safety rules violation. Safety inspection was performed regularly to ensure the compliance of safety regulation.</p> <p><u>Scheme smallholder</u></p> <p>ICS has established the policy related to EHS as per "Kebijakan Manager Group ICS", dated 2 January 2017. In point 3 mentioned: to pay attention and implementing health and safety culture, using personnel protective equipment, if necessary, in performing daily work and to maintain the work premises.</p> <p>Group ICS has also demonstrated under "Program Manajemen K3 Kebun Plasma PT Inti Indosawit Subur tahun 2022, the program such as:</p> <ul style="list-style-type: none"> • Inspection and monitoring on using of PPE for harvester – daily • Training on emergency and preparedness – once a year • Training of first aider and monitoring of first aid kit • Refresh training of OHS including risk assessment. <p>Smallholders Scheme: KUD Tani Rukun, KUD Mulus Rahayu, KUD Mitra Usaha, KUD Makarti Sawit & Associated Smallholder Buatan (KKPA Buatan):</p> <p>Risk assessment for smallholders also updated on 5 January 2022. This Risk Assessment is applicable to all Cooperatives (KUD's) within the certificate scope. The risk in smallholders is more about PPE use during their activities (harvesting and fertilizing).</p> <p>Record of implementation the OHS program provided in indicator 3.6.2.</p>	
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<p>3.6.2</p>	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.</p>	<p>PT Inti Indosawit Subur – Buatan II POM has demonstrated the record of realization the OHS program 2022, such as:</p> <ul style="list-style-type: none"> • Safety shoes was provided twice a year for all process operators including mechanic. Monitoring of PPE usage can be demonstrated on document “Monitoring Penggunaan APD” period January – June 2022 for each station. • Report of MCU for all workers in Buatan II mill, was conducted by “Klinik Asian Agri Sehat Buatan”, dated 22 December 2021 was attended by 43 workers. The MCU was covered urine test, HSaAg and physical test. • Monitoring of emergency response and preparedness facilities, i.e: fire hydrant (76 units) and fire extinguisher (11 units), updated in March 2022, location in Buatan II POM. • Regular emergency response drill conducted on 17 March 2022. The Fire Drill activity attended by 29 participants (workers and staff at Mill). The activity includes Fire Brigade Response, Evacuation to Assembly Point, First Aid Response and Victims Evacuation. Total duration of actual response during Fire Drill is 12 minutes. <p>PPE provision for all workers are demonstrated as per “Bukti Serah Terima Alat Pelindung Diri”. Sample seen:</p> <ul style="list-style-type: none"> • PPE AP Shoes provision for fertilizer workers Simpang 13 May 2022 received by 24 workers (harvester) • PPE Hand Gloves provision for fertilizer workers on 13 May 2022 received by 14 workers (sprayers team) • Checklist of availability the first aid kit, dated 16 May 2022, the result shown OK. Location in Buatan II POM <p>Based on field visit on for spraying workers in Simpang Perak Estate and All KUD’s sample the risk impact probability was irritate and eyes disease,</p>	<p>Complied</p>
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		control by using appropriate PPE (eye wear/safety glasses, masker and hand gloves) and regular training for sprayer workers.	
Criteria 3.7: All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.			
3.7.1	(C) A documented programme that provides training is in place, which is accessible to all staff, workers, scheme smallholders, and outgrowers taking into account gender- specific needs, and which covers applicable aspects of P&C Principles, in a form they understand and includes assessment of the training.	<p>PT Inti Indosawit Subur – Buatan Group (Including Scheme smallholder) has a department which is responsible for the training program, which is the Asian Agri Learning Institute. The department has a 2022 training program recorded in the year 2022 training calendar including Estate and Mill.</p> <p>Through its employee data (master of Employees) and training data personal records, the Asian Agri Learning Institute Department will recommend the Estate and Mill to participate in a training program annually and will also evaluate the effectiveness of the training that has been followed.</p> <p>The training program is divided into several aspects: technical, Administration, Environments & Sustainability and special certifications and there are also training involving vendors or operational suppliers</p> <p>PT Inti Indosawit Subur – Buatan Group (Including Scheme smallholder) has shown the document of training program related to the aspects of RSPO Principles and Criteria has shown under “Program Pelatihan Karyawan PMKS Buatan Satu PT Inti Indosawit Subur – 2022”, consist of:</p> <ul style="list-style-type: none"> • Sustainability awareness – (supply chain, traceability), • Basic safety training (refreshment), • Training of basic fire (refreshment • Training on TPM (Total productive maintenance), • Training of work instruction (WI) – refreshment, • Training on preparedness and emergency response, • Awareness training of RSPO PnC for smallholder member • Training of HCV (refreshment) 	Complied

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		<ul style="list-style-type: none"> • Training for first aider • Training on handling of limited pesticide for operator sprayer (TUS) • Training of fertilizer application <p>The implementation of training program available in indicator 3.7.2</p>	
3.7.2	Records of training are maintained, where appropriate on an individual basis.	<p>Document of training record has demonstrated – year 2021 and 2022, such as:</p> <ul style="list-style-type: none"> • Refreshment training of RSPO requirement include P&C and SCCS dated 16 March 2022 – was attended by 13 workers • Training of refresh SOP for pest and disease control, implemented on 4 April 2022 and attended by 41 participants. • Technical road maintenance training, conducted on 4 February 2022 and attended by 26 participants. • Regular emergency response drill conducted on 17 March 2022. The Fire Drill activity attended by 29 participants (workers and staff at Mill). The activity includes Fire Brigade Response, Evacuation to Assembly Point, First Aid Response and Victims Evacuation. Total duration of actual response during Fire Drill is 12 minutes. • Refreshment training of PPE usage for harvester dated 16 January 2022 <p>Record training for individual basis has also maintained, such as: Mr R*sz (WB operator), consisted of:</p> <ul style="list-style-type: none"> • Training SOP Mass Balance and SOP Traceability” dated 15 May 2019 • Training Traceability and Mass Balance dated 8 May 2018 • Refreshment training of RSPO requirement include P&C and SCCS dated 10 February 2020, 	Complied

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		<ul style="list-style-type: none"> Refreshment training for OHS, HCV and basic fire dated 30 October 2020, Refreshment training of RSPO requirement include P&C and SCCS dated 16 March 2022 <p>Mrs A*b*r (spraying applicator), consist of:</p> <ul style="list-style-type: none"> Training on limited pesticide handling dated 26 September 2016 Refresh training on chemical/pesticides handling dated 28 June 2018 Refreshment training for OHS, HCV and basic fire dated 30 January 2020, Refreshment training for fertilizer application, dated 16th September 2020 Training of refresh SOP for pest and disease control, implemented on 4 April 2022 Regular emergency response drill conducted on 17 March 2022 <p>Mr S*k*r*n* (harvester), consist of:</p> <ul style="list-style-type: none"> Refresh training on harvesting dated 20 May 2013 Refresh training of PPE usage for harvester dated 14-19 January 2020, Refreshment training for OHS, HCV and basic fire dated 30 October 2020 Refreshment training of PPE usage for harvester dated 16 January 2022 Training of refresh SOP for harvesting dated 4 April 2022 	
3.7.3	Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification	SCCS Training has been carried out on 6 April 2022 by head office Jakarta (Welly Joel) through zoom meeting.	Non-compliance

	<p>Standard (SCCS). Training is specific and relevant to the task(s) performed.</p>	<p>Evidence of training can be demonstrated during audit such as attendance list, training material and photo documentation.</p> <p>During interview with weighbridge Clerk, KTU (head of administration), mill manager and dispatch operator confirmed that they has understanding on RSPO supply chain.</p> <p>Non conformance: Personal carrying out the tasks critical for SCCS implementation was not trained properly.</p> <p>Objective Evidence: During the interview with weighbridge clerk at Buatan II Mill confirmed that the weighbridge clerk (on behalf Putri Gea indrasari) has not been trained for RSPO SCCS, in addition she has not understand about the RSPO SCCS.</p>	
<p>Criteria 3.8: Supply chain requirements for mills. Procedure note: all requirements are classified as Critical Indicators. However it will not contribute to suspension if there is more than 5 non-compliance within a principle)</p>			
<p>3.8.1</p>	<p>Identity Preserved Module A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme. Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.</p>	<p>PT Inti Indosawit Subur – Buatan II POM implements RSPO Supply Chain model Mass Balance.</p> <p>Not applicable.</p>	<p>Not Applicable</p>
<p>3.8.2</p>	<p>Mass Balance Module</p>	<p>PT. Inti Indosawit Subur – Buatan II POM holds current RSPO P&C Certificate No. RSPO 633774, first certification start on 1 March 2011 and</p>	<p>Complied</p>

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	<p>A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	<p>current certificate issued on 12/08/2021 and expired on 11/08/2026. In the current certificate, PT. Inti Indosawit Subur – Buatan II POM uses Mass Balance supply chain model. The mill only claimed the FFB proportion from certified supply bases which comprise of company-own estate (Simpang Perak Estate) and 9 scheme Smallholder in form of cooperative/Koperasi Unit Desa (KUD). The proportion of non-certified FFB comes from third-party supplier, consist of 16 Supplier:</p> <ul style="list-style-type: none"> - Asosiasi Amanah (APSSA) - Anugrah (APSSA) - Kop. Air Hitam Jaya - Besty Ella Sima Siahaan - James Sihombing - KT Bina Mandiri Bersama - Riri Kristin Paulina (RKP) - Haluga (HL) - CV Harapan Kita - Ady - Vicky - Bumdes amanah - Bunga Tanjung - Budi (BD) - Saliman (SLM) - Peter Susetio Hadi 	
<p>3.8.3</p>	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO</p>	<p>The estimated tonnage of certified CPO and PK that could potentially produce by PT. Inti Indosawit Subur – Buatan II POM its recorded in RSPO Public Summary report, certificate and RSPO IT Platform.</p>	<p>Complied</p>

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	<p>and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p>	<p>The mill has met registration and reporting requirement as it registered in RSPO IT Platform (PalmTrace) with ID number RSPO_PO1000000148.</p> <p>Below are the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year 2021/2022:</p> <p><u>Forecast volume (Sept 2021 – Aug 2022)</u> FFB : 212,962 MT CPO : 44,722 MT (OER: 21%) PK : 11,713 (KER: 5.50%)</p> <p><u>Actual production volume (Sept 2021 – ytd May 2022)</u> FFB: 169,710.26 MT CPO: 32,229.79 MT PK: 8,336.77 MT</p> <p><u>Actual sold volume as RSPO certified (Sept 2021 – May 2022)</u> CPO: - PK: 7,148.18 MT</p>	
<p>3.8.4</p>	<p>The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.</p>	<p>PT. Inti Indosawit Subur – Buatan II POM is subsidiary of PT. Inti Indosawit Subur, a member of RSPO, with RSPO membership No.1-0022-06-000-00 since 6 February 2006.</p> <p>PT Inti Indosawit Subur – Buatan II POM has meet all registration and reporting requirements.</p> <p>RSPO IT Platform/PalmTrace account RSPO_ PO1000000382.</p>	<p>Complied</p>
<p>3.8.5</p>	<p>Documented procedures The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p>	<p>PT. Inti Indosawit Subur – Buatan II POM can demonstrate procedures as follow:</p> <ul style="list-style-type: none"> • Standard Operating Procedures – Traceability (AA-MPM-OP-1400.17.R7) dated 1 October 2019. The procedures cover traceability of CPO and PK, since FFB receiving from Simpang Perak Estate and Smallholder, processing up to shipping of CPO and PK as well as daily 	<p>Complied</p>

	<p>a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</p> <p>b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</p> <p>c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill's procedures for the implementation of this standard.</p> <p>d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBS including ensuring no contamination in the IP mill.</p>	<p>production report. The procedure also regulates the internal audit by Sustainability Internal Audit Manager. Traceability records are to be kept for 10 years.</p> <ul style="list-style-type: none"> • Standard Operating Procedure – Book Keeping (AA-MPM-OP-1400.18-R4). The procedure explains method to check only certified product received. The book keeping mass balance stated every 3 months: January-March, April-June, July-September, and October-December each year. Head of Environment and Sustainability will inform to Certification Body in the case of projected overproduction. • SOP for mill operation Mill Policy Manual: <ul style="list-style-type: none"> - SOP AA-MPM-OP-1400.02.R2 Stasiun Penerimaan for FFB receiving station; - SOP AA-SOP-OP-101.5-R0 Grading; - SOP AA-MPM-OP-1400.03.R1 Stasiun Rebusan for sterilizer; - SOP AA-MPM-OP-1400.04.R1 Stasiun Pemisahan Berondolan for loose fruit separation; - SOP AA-MPM-OP-1400.05-R1 Stasiun Pengadukan dan Pengempaan for pressing station; - SOP AA-MPM-OP-1400.06-R1 Stasiun Pemurnian for clarification; - SOP AA-MPM-OP-1400.07-R1 Stasiun Pemisahan Nut dan Fiber for nut and fiber separation; - SOP AA-MPM-OP-1400.08-R1 Stasiun Kernel for kernel station; - SOP AA-MPM-OP-1400.09-R1 Stasiun Boiler; - SOP AA-MPM-OP-1400.10-R1 Stasiun Engine Room; - SOP AA-MPM-OP-1400.11-R1 Stasiun Water Treatment; - SOP AA-MPM-OP-1400.12-R1 Laboratorium; - SOP AA-MPM-OP-1400.13-R1 Stasiun Pengelolaan Limbah for palm oil mill effluent treatment; 	
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		<ul style="list-style-type: none"> - SOP AA-MPM-OP-1400.14-R2 Stasiun Penimbunan dan Pengiriman CPO dan Kernel for CPO and PK bulking and despatch operation; - SOP AA-MPM-OP-1400.15-R1 Perawatan for preventive maintenance; - SOP AA-MPM-OP-1400.18-R4 Book Keeping - SOP AA-MPM-OP-1400.17-R7 Traceability <p>PT. Inti Indosawit Subur – Buatan II POM is able to demonstrate complete and up-to-date records and report demonstrating compliance with the supply chain’s general requirement and modular requirement, including training records.</p> <p>As per Procedure of Traceability (AA-MPM-OP-1400.17-R6), the responsible person in charge to the supply chain system is Mill Manager. During audit, the mill manager is able to demonstrate sufficient knowledge and understanding on RSPO supply chain implementation for palm oil mill.</p> <p>PT IIS Buatan II POM has a procedures for receiving and processing certified and non-certified FFBS including ensuring no contamination in the IP mill, as described in SOP AA-MPM-OP-1400.17-R7 Traceability, dated 1 October 2019. However Buatan II POM was apply Mass Balance system.</p>	
3.8.6	<p>Internal Audit</p> <p>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill;</p> <p>a) Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>b) Effectively implements and maintains the standard requirements within its organisation.</p>	<p>PT. Inti Indosawit Subur – Buatan II POM has a procedure to conduct internal audit RSPO, including RSPO SCCS as per Procedure of Traceability (AA-MPM-OP-1400.17-R7) chapter 6.7, Sustainability Internal Audit Manager conducted internal audit annually, to ensure all operational and documentation activities are comply with the requirement in RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. Internal audit for all scheme including RSPO SCCS also refer to SOP Internal Audit Nomor: AA-SOP-ES-6001-R5 dated 1 August</p>	Complied

	<p>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p>	<p>2020; Chapter 4.0 stated that Internal audit conducted minimum once a year considering the critical area.</p> <p>Last internal audit conducted on 9 – 14 May 2022. The report available under document “Internal Audit Sustainability Integrasi”.</p> <p>Management review dated 23 May 2022, was attended by Technical Controller, POM Manager, Sustainability Staff. Document of Management Review available and recorded in minutes of meeting:</p> <ul style="list-style-type: none"> - Internal audit result - Customer feedback - Proses performance and product conformity - Status of Corrective and Preventive Action - Follow up previous management review - Change that could effect to the management system <p>Output of management review has include:</p> <ul style="list-style-type: none"> - Recommendation for improvement <p>Resources needed.</p>	
<p>3.8.7</p>	<p>Purchasing and Goods In</p> <p>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBS received.</p> <p>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>	<p>PT Inti Indosawit Subur – Buatan II POM has demonstrated SOP of Traceability (AA-MPM-OP-1400.7.R7), chapter 5.1 indicates the Weighbridge Clerk has responsibility to input data and print weighbridge card based on “Surat Pengantar TBS”, covering information e.g. estate name and block number, mill name, date of delivery, product description and quantity, RSPO certificate number, transporter identity and unique identification number.</p> <p>PT. Inti Indosawit Subur – Buatan II POM receive FFB from certified and non-certified source. Certified source consist of own estate (Buatan Estate) and 9 scheme Smallholder in form of cooperative/Koperasi Unit Desa (KUD). The proportion of non-certified FFB comes from third-party supplier (6 Supplier: CV Mandiri Sentosa (PBD-A), CV Mandiri Sentosa</p>	<p>Complied</p>

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		<p>(PBD-R), CV Putra Kembar Sentosa PBD-C, APSS Berkah Makmur Bersama, PT Teguh Karya Wana Lestari, and TKD). FFB Non certified approximately 34% from total FFB received by Buatan II POM.</p> <p>Document "Surat Pengantar TBS" (FFB Delivery Note) and Kartu Timbangan (Weighbridge Card) described identity and location of FFB source and other item required e.g.</p> <p>Certified FFB:</p> <ul style="list-style-type: none"> • Weighbridge ticket "Kartu Timbangan No.PBDA***" dated 10/02/2022, for 416 FFB bunches; nett weight 6,399 kg; from Kebun KKPA Buatan – KKPA Delima Sakti, Afdeling 8, block H03f & H03g; vehicle BM9972ZUCT; Driver: Sugeng Margono; RSPO certificate No.RSPO638947. • Weighbridge ticket "Kartu Timbangan No.PBDA221***" dated 10/02/2022, for 554 FFB bunches; nett weight 5,220 kg; from KSP-4 Kebun Simpang Perak, block D16a & D17a; vehicle BM8098TK; Driver: Anton Siagian; RSPO certificate No.RSPO638947. • Weighbridge ticket "Kartu Timbangan No.PBDA221***" dated 03/02/2022, for 324 FFB bunches; nett weight 8,575 kg; from KT-152 Sawit Mas – KUD Mitra Usaha, block B09013; vehicle BM8071BC; Driver: Putra; RSPO certificate No.RSPO638947. • Weighbridge ticket "Kartu Timbangan No.PBDA221***" dated 04/02/2022, for 464 FFB bunches; nett weight 9,632 kg; from KT-231 – KUD Bina Mulia, block B03018; vehicle BM9999UU; Driver: Ari; RSPO certificate No.RSPO638947. <p>Non-certified FFB:</p> <ul style="list-style-type: none"> • Weighbridge ticket "Kartu Timbangan No.PBDA520106134" dated 27 December 2021, for 774 FFB bunches; nett weight 14,698 kg; from Supplier CV Mandiri Sentosa – ID A008; vehicle B9050VB; Driver: Ramiro; Non Certified. 	
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		<ul style="list-style-type: none"> • Weighbridge ticket "Kartu Timbangan No.PBDA520106135" dated 27 December 2021, for 211 FFB bunches; nett weight 3,381 kg; from Supplier CV Putra Kembar Sentosa – ID ST00033; vehicle BM8350TV; Driver: Anto; Non Certified. • Weighbridge ticket "Kartu Timbangan No.PBDA520106123" dated 27 December 2021, for 495 FFB bunches; nett weight 9,409 kg; from Supplier CV Mandiri Sentosa – ID A007; vehicle BM8072SC; Driver: Edi; Non certified. 	
<p>3.8.8</p>	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ol style="list-style-type: none"> The name and address of the buyer; The name and address of the seller; The loading or shipment / delivery date; The date on which the documents were issued; RSPO certificate number; A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); The quantity of the products delivered; Any related transport documentation; A unique identification number. 	<p>PT Inti Indosawit Subur – Buatan II Palm Oil Mill has ensure that the following minimum information for RSPO certified products is made available in document form such as: Sales contract, Delivery Order/Delivery noytes and Weighbridge Ticket. The information are complete and can be presented across a range of documents issued for RSPO certified oil palm products. Sample seen:</p> <p><u>CPO Contract/Delivery Order and Weighbridge ticket:</u></p> <ul style="list-style-type: none"> - Sales Contract No. 12013/CC10/02/21 dated 6 December 2021. Buyer name: PT Sari Dumai Sejati; Buyer address; Jl. Palembang Kav 35 – 37, Kebon Melati, Tanah Abang, Kota Adm. Jakarta Pusat, DKI Jakarta 10230; Delivery date: Soonest; Quantity: 500 MT; Comodity: RSPO Certified CPO; SC Model: Mass Balance; Certificate Number: RSPO 638947; Expired date: 11 August 2026; Specification: FFA max 5%, Moisture and impurities max 0.5%; Price: IDR ***; Seller: PT Inti Indosawit Subur; Seller address: Jl. Palembang Kav 35 – 37, Kebon Melati, Tanah Abang, Kota Adm. Jakarta Pusat, DKI Jakarta 10230; Destination port: Kawasan Berikat PT SDS Lubuk gaung. - The sales contract was defined into delivery orders: Delivery Order PT. Inti Indosawit Subur No.12013/DC10/02/21 dated 6 December 2021, instruction to PT. Inti Indosawit Subur – Buatan II POM to deliver 500,000 kg commodity Minyak Kelapa Sawit RSPO; Supply Chain Model Mass Balance; No.Ref. RSPO 638947. 	<p>Complied</p>

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		<p>Delivery Order PT. Inti Indosawit Subur No. 12013/DC10/02/21 dated 6 December 2021, completed with 20 deliveries. Sample dispatch slip CSPO from Buatan II POM to customer:</p> <ul style="list-style-type: none"> - Weighbridge ticket Buatan II POM No.PBDC121201979 dated 08 December 2021. Destination PT. Sari Dumai Sejati. Commodity CPO Certified RSPO. Supply Chain Model Mass Balance. RSPO Certificate No.RSPO638947. DO No. 12013/DC10/02/21. Transporter CV. Jasa Bersama, Vehicle No.BM9896CU, Driver: Fahri Afrizal. Volume dispatched netto 27.08 MT; Seal No. 5635344-5635351. <p>This transaction was recorded in PalmTrace as TR-ca2224ff-0012, dated 30 March 2022 for CSPO Mass Balance, volume 901.28 MT. Seller PT. Inti Indosawit Subur – Buatan II POM. Buyer PT Sari Dumai Sejati, confirmation date 30 March 2022.</p> <p><u>PK Sales Contract/Delivery Order and Weighbridge ticket:</u></p> <p>All PK from PT Inti Indosawit Subur – Buatan II POM was deliver and process in Buatan I Kernel Crushing Plant (same company).</p> <p>Delivery Order PT. Inti Indosawit Subur No.12301/DC10/13/21 dated 1 December 2021; From: PT Inti Indosawit Subur – Buatan II POM, To: PT Inti Indosawit Subur – KCP Buatan I; Comodity: Palm Kernel; Quantity: 200,000 Kg; Supply Chain model: Mass Balance; Certificate number RSPO 638947. This DO fulfilled with 10 deliveries. Sample dispatch slip CSPK from Buatan II POM to customer:</p> <ul style="list-style-type: none"> ✓ Weighbridge Ticket No. PBDC221200717 dated 4 December 2021. Destination PT. Inti Indosawit Subur – Buatan I KCP. Commodity PK Certified RSPO. Supply Chain Model Mass Balance. RSPO Certificate No.RSPO638947. DO No. 12301/DC10/13/21. Transporter Buana Jaya Bersama, Vehicle No.BM9547PC. Volume dispatched 18,350 kg. Seal No.5635044-5635055. 	
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		<p>This transaction was recorded in PalmTrace as TR-055db206-f4b6, dated 31 January 2022 for CSPK Mass Balance, confirmation date 31 January 2022.</p>	
<p>3.8.9</p>	<p>Outsourcing Activities</p> <p>i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification.</p> <p>ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</p>	<p>PT. Inti Indosawit Subur – Buatan II POM not outsource its milling activities however operate subcontractor for CPO and PK transporter. The appointed outsourced company is CV Jasa Bersama and PT Buana Jaya Bersama.</p> <p>PT. Inti Indosawit Subur – Buatan II POM having legal ownership of material being transported by appointed outsourced companies: CV Jasa Bersama and PT Buana Jaya Bersama.</p> <p>PT. Inti Indosawit Subur – Buatan II POM have a contract agreement with transporter as below:</p> <ul style="list-style-type: none"> - “Perjanjian Pengangkutan Nomor: 05/VIII/JB-IIS/2019” dated 2 August 2019 between PT Inti Indosawit Subur – Buatan I POM and CV Jasa Bersama. Contract transport for CPO & PK. - “Perjanjian Pengangkutan Nomor: 07/VIII/BJB-IIS/2019” dated 2 August 2019 between PT Inti Indosawit Subur – Buatan I POM and PT Buana Jaya Bersama. Contract transport for CPO & PK. <p>Contract agreement are signed and enforceable by both parties. According to contract agreement article 7 point 1.k stated that <i>“Transporter bersedia memenuhi persyaratan system sertifikasi rantai pasok saat pengangkutan bahan baku dan bersedia untuk diaudit oleh auditor internal perusahaan dan auditor pihak eksternal dari badan sertifikasi yang ditunjuk oleh pihak kedua jika diperlukan”</i> – Transporter are willing to comply with certification system of RSPO Supply Chain during transport material and willing to be audit by internal auditor company (PT IIS – Buatan II POM) and external auditor from Certification Body if necessary. Interview with transporter CV Jasa Bersama and PT Wijaya Manggala Premier Lestari (PT WMPL) conducted on 15 June 2022 during audit onsite, it was noted that they have understand with RSPO</p>	<p>Complied</p>

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		<p>Supply Chain requirement during CPO/PK transport and they were pleasure if the CB/Auditor verify their operation while needed.</p> <p>PT IIS Buatan II POM has a procedure to control the outsourced transporter through "SOP Traceability AA-MPM-OP-1400.17-R7 dated 1 October 2019"</p> <p>Internal control for CPO and PK delivery by contractor has made as well with:</p> <ul style="list-style-type: none"> ✓ Surat Izin Muat CPO dan Kernel, contain information of Driver name, Identity number, Car/Truck Number, CPO/PK Dispatch time, netto, incoming and outgoing time\ ✓ Delivery Order Slip from Transporter, contain information of sales contract number, Truck number, destination, driver name, port destination. <p>Daftar Periksa Kesiapan Pengiriman CPO/Kernel contain information of Truck number, driver name, date of inspection, item inspection including: driver identity and completeness of vehicle legality, completeness of physical standard of vehicle, number of seal.</p>	
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3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	<p>PT Inti Indosawit Subur – Buatan II POM has recorded name and contact detail of all contractors, as follows:</p> <table border="1" data-bbox="1093 443 1951 823"> <tr> <td>Name of Transporter</td> <td>CV Jasa Bersama</td> <td>PT Buana Jaya Bersama</td> </tr> <tr> <td>Initial Name</td> <td>JB</td> <td>BJB</td> </tr> <tr> <td>Address</td> <td>Jl. Siak 2 Palas KB 77 KM 15 Pekanbaru</td> <td>Jl. Siak II RT.02 RW. 03 Kec. Payung Sekaki Kel. Bandar Raya - Pekanbaru</td> </tr> <tr> <td>Contact Person</td> <td>Suwito Djingga (Director)</td> <td>Eltono (Director)</td> </tr> <tr> <td>Telephone</td> <td>0811279***</td> <td>08217043***</td> </tr> </table>	Name of Transporter	CV Jasa Bersama	PT Buana Jaya Bersama	Initial Name	JB	BJB	Address	Jl. Siak 2 Palas KB 77 KM 15 Pekanbaru	Jl. Siak II RT.02 RW. 03 Kec. Payung Sekaki Kel. Bandar Raya - Pekanbaru	Contact Person	Suwito Djingga (Director)	Eltono (Director)	Telephone	0811279***	08217043***	Complied
Name of Transporter	CV Jasa Bersama	PT Buana Jaya Bersama																
Initial Name	JB	BJB																
Address	Jl. Siak 2 Palas KB 77 KM 15 Pekanbaru	Jl. Siak II RT.02 RW. 03 Kec. Payung Sekaki Kel. Bandar Raya - Pekanbaru																
Contact Person	Suwito Djingga (Director)	Eltono (Director)																
Telephone	0811279***	08217043***																
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	The site committed to inform CB related name and contact details of any new contractors as mentioned in Procedure "SOP Traceability AA-MPM-OP-1400.17-R7 dated 1 October 2019".	Complied															
3.8.12	<p>Record keeping</p> <p>i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.</p> <p>ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.</p> <p>iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p>iv) For Mass Balance Module, the mill:</p>	<p>The organization has maintained accurate, complete, up-to-date and accessible records and reports covering all aspects of RSPO Supply Chain requirements, as evident in:</p> <ul style="list-style-type: none"> - FFB delivery note - Weighbridge ticket for FFB receiving, CPO and PK delivery - Delivery Order - Sales contract - Shipping Announcement - Mass balance report - Internal audit RSPO SCCS and Management review 	Complied															

	<p>a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</p> <p>b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock).</p>	<p>The procedure of Traceability (AA-MPM-OP-1400.7.R7), requires that all records and reports related to traceability and book keeping are retained for a period of 10 years.</p> <p>All receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK are record and balance in a three-monthly basis, as evidence in "Mass Balance Report Buatan II POM" period 2021/2022: January – March, April – June, July – September, October – December, January – March, April – ytd June.</p> <p>All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios/actual production of CPO and PK.</p> <p>According to Mass balance Report, Buatan II POM only deliver Mass Balance sales from a positive stock.</p>							
<p>3.8.13</p>	<p>Extraction Rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate(KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	<p>The organization is able to provided estimate volume of CPO and PK in a year period as in Budget FY2021/2022 Production FFB, CPO and PK. The organization also keep an up to date record of the FFB volume received, CPO and PK produced over a period of twelve (12) month, as in Rekapitulasi Produksi TBS, CPO dan PK PT Inti Indosawit Subur Buatan II POM.</p> <p>OER and KER are estimated based on associated inputs and upon past experience (previous year FFB, CPO and PK production).</p> <p>The site has set OER for budget 2022 (Jan - Dec) as 20.18% and KER as 5.30%.</p> <p>Budget FFB process 2022: certified & Non certified 277,807.47 MT.</p> <p>Budget CPO production 2022: certified & Non certified 55,078.79 MT.</p> <p>Budget PK production 2022: certified & non certified 14,723.79 MT.</p> <p>Previous Budget vs realization on 2021 (Jan – Dec) as below:</p> <table border="1" data-bbox="1093 1334 1935 1385"> <thead> <tr> <th>Description</th> <th>Budget</th> <th>Realization</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Description	Budget	Realization				<p>Complied</p>
Description	Budget	Realization							

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		<table border="1"> <tr> <td>FFB Certified</td> <td>204,597.59</td> <td>173,226.24</td> </tr> <tr> <td>FFB Non Certified</td> <td>84,268.81</td> <td>80,604.22</td> </tr> <tr> <td>CPO Certified</td> <td>40,510.32</td> <td>34,995.79</td> </tr> <tr> <td>CPO Non Certified</td> <td>16,685.22</td> <td>14,961.79</td> </tr> <tr> <td>PK Certified</td> <td>10,466.25</td> <td>8,798.57</td> </tr> <tr> <td>PK Non Certified</td> <td>4,466.25</td> <td>4,101.17</td> </tr> <tr> <td>OER</td> <td>19.80</td> <td>19.68</td> </tr> <tr> <td>KER</td> <td>5.30</td> <td>5.08</td> </tr> </table>	FFB Certified	204,597.59	173,226.24	FFB Non Certified	84,268.81	80,604.22	CPO Certified	40,510.32	34,995.79	CPO Non Certified	16,685.22	14,961.79	PK Certified	10,466.25	8,798.57	PK Non Certified	4,466.25	4,101.17	OER	19.80	19.68	KER	5.30	5.08	
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3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	<p>The actual conversion ratio is monitored on daily basis through sounding result and documented in daily report. PT. Inti Indosawit Subur – Buatan II POM is able to demonstrate the work instruction for analysis of oil content.</p> <p>Sample seen on document of "Laporan Harian Produksi". Based on Laporan Harian Produksi dated 31 May 2022, the sounding result and production report shows that actual conversion ratios from FFB into CPO are:</p> <ul style="list-style-type: none"> a. OER For FFB from Own Estate: 19.65% b. OER For FFB from Scheme smallholder: 19.23% c. OER For FFB from third-party: 17.85% d. OER Average 19.77% <p>And actual conversion ratios from FFB into PK are:</p> <ul style="list-style-type: none"> a. KER For FFB from Own Estate: 4.71% b. KER For FFB from Scheme smallholder: 4.71% c. KER For FFB from third-party: 4.71% 	Complied																								

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3.8.15	<p>Processing</p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	Not applicable. PT IIS – Buatan II POM implementing Mass Balance Model for Supply Chain.	Not Applicable																																																						
3.8.16	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p>	<p>PT. Inti Indosawit subur – Buatan II POM has made shipping announcement inside PalmTrace transaction, sample seen for period June 2021 – May 2022:</p> <table border="1"> <thead> <tr> <th>Transaction ID</th> <th>Buyer</th> <th>Product</th> <th>Supply Chain Model</th> <th>Volume</th> <th>Status</th> </tr> </thead> <tbody> <tr> <td>TR-00a46e84-88d8</td> <td>PT. Sari Dumai Sejati</td> <td>CSPO</td> <td>MB</td> <td>10053.8</td> <td>Confirmed</td> </tr> <tr> <td>TR-13f8b6b9-907d</td> <td>PT. Sari Dumai Sejati</td> <td>CSPO</td> <td>MB</td> <td>6864.41</td> <td>Confirmed</td> </tr> <tr> <td>TR-ca2224ff-0012</td> <td>PT. Sari Dumai Sejati</td> <td>CSPO</td> <td>MB</td> <td>901.28</td> <td>Confirmed</td> </tr> <tr> <td>TR-28c4ec2c-702a</td> <td>PT. Sari Dumai Sejati</td> <td>CSPO</td> <td>MB</td> <td>334.93</td> <td>Confirmed</td> </tr> <tr> <td>TR-17367384-d3c8</td> <td>PT. Sari Dumai Sejati</td> <td>CSPO</td> <td>MB</td> <td>13.79</td> <td>Confirmed</td> </tr> <tr> <td>TR-52cf73bf-8ac4</td> <td>PT. Sari Dumai Sejati</td> <td>CSPO</td> <td>MB</td> <td>105.32</td> <td>Confirmed</td> </tr> <tr> <td>TR-3058cebb-0850</td> <td>PT. Sari Dumai Sejati</td> <td>CSPO</td> <td>MB</td> <td>445.44</td> <td>Confirmed</td> </tr> <tr> <td>TR-b15d6c66-d227</td> <td>PT. Sari Dumai Sejati</td> <td>CSPO</td> <td>MB</td> <td>310.41</td> <td>Confirmed</td> </tr> </tbody> </table>	Transaction ID	Buyer	Product	Supply Chain Model	Volume	Status	TR-00a46e84-88d8	PT. Sari Dumai Sejati	CSPO	MB	10053.8	Confirmed	TR-13f8b6b9-907d	PT. Sari Dumai Sejati	CSPO	MB	6864.41	Confirmed	TR-ca2224ff-0012	PT. Sari Dumai Sejati	CSPO	MB	901.28	Confirmed	TR-28c4ec2c-702a	PT. Sari Dumai Sejati	CSPO	MB	334.93	Confirmed	TR-17367384-d3c8	PT. Sari Dumai Sejati	CSPO	MB	13.79	Confirmed	TR-52cf73bf-8ac4	PT. Sari Dumai Sejati	CSPO	MB	105.32	Confirmed	TR-3058cebb-0850	PT. Sari Dumai Sejati	CSPO	MB	445.44	Confirmed	TR-b15d6c66-d227	PT. Sari Dumai Sejati	CSPO	MB	310.41	Confirmed	Complied
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		TR-e475b150-1827	PT Padang Raya Cakrawala	CSPO	MB	149.55	Confirmed	
		TR-f059365e-25a2	PT. Sari Dumai Sejati	CSPO	MB	60.7	Confirmed	
		TR-f7b10042-266c	PT Padang Raya Cakrawala	CSPO	MB	350.78	Confirmed	
		TR-dcaa78ce-2472	PT. Sari Dumai Sejati	CSPO	MB	279.13	Confirmed	
		TR-54a8ee63-97bd	PT. Sari Dumai Sejati	CSPO	MB	20.87	Confirmed	
		TR-c36415bb-ceb9	Apical (Malaysia) Sdn Bhd	CSPO	MB	518.91	Confirmed	
		TR-3e6278f2-34bf	PT. Sari Dumai Sejati	CSPO	MB	1108.87	Confirmed	
		TR-180c8245-a5f8	PT. Sari Dumai Sejati	CSPO	MB	210.53	Confirmed	
		TR-d0b9a9d4-d155	PT. Sari Dumai Sejati	CSPO	MB	157.9	Confirmed	
		TR-cd459826-6c1e	PT. Sari Dumai Sejati	CSPO	MB	256.92	Confirmed	
		TR-3a7d6ba5-359b	PT. Sari Dumai Sejati	CSPO	MB	265.79	Confirmed	
		TR-056eb391-7a5b	PT. Sari Dumai Sejati	CSPO	MB	353.17	Confirmed	
		TR-45345a45-4c7a	PT. Sari Dumai Sejati	CSPO	MB	134.97	Confirmed	
		TR-6753a6a6-3463	PT. Sari Dumai Sejati	CSPO	MB	11.86	Confirmed	

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		TR-3ea074cc-0fe8	PT. Sari Dumai Sejati	CSPO	MB	33.18	Confirmed
		TR-1a0d1e67-7cc1	PT. Sari Dumai Sejati	CSPO	MB	847.77	Confirmed
		TR-0a41d881-2445	PT. Sari Dumai Sejati	CSPO	MB	126.35	Confirmed
		TR-0cd9b3e2-b214	PT. Sari Dumai Sejati	CSPO	MB	241.15	Confirmed
		TR-8ce94f5c-2319	PT. Sari Dumai Sejati	CSPO	MB	1940.22	Confirmed
		TR-85e9e48c-45c6	PT. Sari Dumai Sejati	CSPO	MB	445.35	Confirmed
		TR-9bb03bd2-9562	PT. Sari Dumai Sejati	CSPO	MB	502.82	Confirmed
		TR-5f8c04ab-4bcb	PT. Sari Dumai Sejati	CSPO	MB	174.13	Confirmed
		TR-ef19b58a-ae98	PT. Sari Dumai Sejati	CSPO	MB	858.51	Confirmed
		TR-654249aa-b2e8	PT. Sari Dumai Sejati	CSPO	MB	130.53	Confirmed
		TR-f3c167de-83a7	PT Sari Dumai Sejati	CSPO	MB	2.41	Confirmed
		TR-ce7cd15b-0d57	PT. Sari Dumai Sejati	CSPO	MB	10053.8	Confirmed
		TR-65342046-77c9	PT. Sari Dumai Sejati	CSPO	MB	6864.41	Confirmed
		TR-7a014f06-5e1c	PT. Sari Dumai Sejati	CSPO	MB	901.28	Confirmed
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		TR-f3c167de-83a7	PT Sari Dumai Sejati	CSPO	MB	901.28	Confirmed
		TR-579b64d8-aef1	KCP Buatan I	CSPK	MB	2732.06	Confirmed
		TR-055db206-f4b6	KCP Buatan I	CSPK	MB	1017.43	Confirmed
		TR-d553f705-5855	KCP Buatan I	CSPK	MB	1045.18	Confirmed
		TR-a89a6879-06d8	KCP Buatan I	CSPK	MB	651.49	Confirmed
		TR-d8237ee7-a989	KCP Buatan I	CSPK	MB	815.21	Confirmed
		TR-f9762ccb-25ee	KCP Buatan I	CSPK	MB	886.81	Confirmed
		TR-05145b2e-e25b	KCP Buatan I	CSPK	MB	2789.85	Confirmed
		TR-10ed42d6-6da7	KCP Buatan I	CSPK	MB	892	Confirmed
		TR-712ab6dc-7461	KCP Buatan I	CSPK	MB	1722.94	Confirmed
		TR-bd77b81b-0763	KCP Buatan I	CSPK	MB	866.98	Confirmed
		<p>PT. Inti Indosawit Subur – Buatan II POM made remove RSPO certified CSPO from their PalmTrace account with volume remove: 1,274.28 MT CSPO; Stock removed for CSPO sold as ISCC certified. The evidence of</p>					

		remove transaction can be demonstrated on the palmtrace transaction with transaction ID: ST-TR-8f9cb2d6-3dc4, remove date: 06/06/2022.	
3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	PT. Inti Indosawit Subur – Buatan II POM has not made claims regarding the support of RSPO certified oil palm products. However the organization aware about the RSPO Rules on Market Communications and Claims.	Complied
General corporate communications			
4.1	<p>A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.</p>	PT. Inti Indosawit Subur (with the brand Asian Agri), the parent company of Buatan II POM is highlighting its commitment to the principles of RSPO, and directly referring to RSPO website. The corporate communication can be found at http://www.asianagri.com .	Complied
4.2	<p>In corporate communications a member is allowed to:</p> <ul style="list-style-type: none"> • Display its RSPO membership status • Display the RSPO web address (www.rspo.org) • State that the member supports the work of the RSPO • State the member's history with regard to the RSPO. • Use the RSPO trademark to promote its membership of the RSPO. <p>Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at www.rspo.org' where the link must lead to the member's profile page.</p>	<p>PT. Inti Indosawit Subur (with the brand Asian Agri), in its website:</p> <ol style="list-style-type: none"> a. Display its RSPO membership status: No, PT. Inti Indosawit Subur (with the brand Asian Agri), did not display its RSPO membership status. The CH only stated "In 2006, became a member of the Roundtable of Sustainable Palm Oil. We received out first RSPO certification for our estate in 2010." b. Display the RSPO web address: Not in direct manner. PT. Inti Indosawit Subur (with the brand Asian Agri), made a link to RSPO website. c. State the member supports the work of the RSPO: Not in direct manner. In the website, PT. Inti Indosawit Subur (with the brand Asian Agri), "In 2006, became a member of the Roundtable of Sustainable Palm Oil. We received out first RSPO certification for our estate in 2010." d. State the member's history with regards to the RSPO: Not in direct manner. In the website, In the website, PT. Inti Indosawit Subur (with the brand Asian Agri), "In 2006, became a member of the Roundtable 	Complied

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		<p>of Sustainable Palm Oil. We received our first RSPO certification for our estate in 2010, and in 2012, the certification for our smallholder scheme.”</p> <p>Use of RSPO Trademark to promote its membership of the RSPO: No, PT. Inti Indosawit Subur (with the brand Asian Agri), did not use RSPO trademark in its corporate communication such in website.</p>	
4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	<p>No, PT. Inti Indosawit Subur (with the brand Asian Agri), did not display its RSPO membership status.</p> <p>It is clear that the statement did not lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.</p>	Complied
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member’s own products.	<p>No, PT. Inti Indosawit Subur (with the brand Asian Agri), did not display its RSPO membership status.</p> <p>It is clear that the statement are clear and did not mislead consumers or other stakeholders as to the certified content of oil palm products in the PT. Inti Indosawit Subur – Buatan II POM own products.</p>	Complied
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	No, PT. Inti Indosawit Subur (with the brand Asian Agri) did not display its RSPO Corporate Logo in any document.	Complied
Business to business communications			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	There was no use of RSPO trademark and/or RSPO corporate logo in business to business communication related to RSPO certified product; between PT. Inti Indosawit Subur – Buatan II POM and their buyers.	Complied
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating	When confirming the sale of certified oil palm products, PT. Inti Indosawit Subur – Buatan II POM followed the requirements of the RSPO SCCS. PT.	Complied

	the supply chain model and certificate number under which the claim is being made.	Inti Indosawit Subur – Buatan II POM stating the supply chain model and certificate number under which the claim is being made.	
5.3	<p>Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options:</p> <p>a) If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer’s SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.</p> <p>b) If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p>	<p>PT. Inti Indosawit Subur – Buatan II POM is not a distributor and/or wholesaler.</p> <p>Not applicable.</p>	Not Applicable
5.4	<p>A certified member can provide information to its customers detailing the presence of certified palm oil contained within a product even if it is not eligible for a product-specific under RSPO rules. The end product must not be labelled as certified or sold in such a way that implies RSPO certification.</p> <p>For example, a retailer or food service company may require a breakdown of all palm based ingredients within an end product and the certified status of each. This information may be provided by a certified RSPO member without constituting a product-specific claim.</p>	<p>PT. Inti Indosawit Subur – Buatan II POM is not producing or selling end-product to consumer. No labelling on product whatsoever.</p> <p>Not applicable.</p>	Not Applicable

MODULE B – MASS BALANCE SPECIFIC RULES

Minimum Mass Balance content

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	95% or above of the oil palm content must be RSPO MB-certified.	PT Inti Indosawit Subur – Buatan II POM is producing and selling CSPO and CSPK; All CSPO/CSPK sold are 100 % content oil palm RSPO MB-certified.	Complied
	Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.	PT Inti Indosawit Subur – Buatan II POM was sold the RSPO MB for CSPO and CSPK. The product is 100% RSPO certified MB. There is no any percentage of non-certified oil palm within the product.	Complied
Labelling and trademark (MB)			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> • Surrounded by the text: 'Certified sustainable palm oil'. • The RSPO label MUST contain the tag 'MIXED'. The tag MIXED designates oil palm products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag 'MIXED' on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim. • The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'. • Wherever the RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4 pt (1.4 mm or 0.06 inch). • In on-pack communications, the RSPO trademark can be printed anywhere on the pack. Further guidance on use of the trademark is provided in the RSPO Trademark License Terms and Conditions and 	<p>PT Inti Indosawit Subur (with the brand Asian Agri), did not use RSPO trademark in its corporate communication such in website.</p> <p>When confirming the sales of certified oil palm products, PT Inti Indosawit Subur – Buatan II POM followed the requirements of the RSPO SCCS. PT Inti Indosawit Subur – Buatan II POM stating the supply chain model and certificate number under which the claim is being made.</p>	Complied

	in Annex 1 of the Rules on Market Communications & Claims document.		
Messaging (MB)			
	<p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <ul style="list-style-type: none"> • [Oil palm products]/[palm oil]/[palm kernel oil] from RSPO-certified mills and plantations were mixed with non-certified oil palm products in the supply chain. • The volume of [oil palm products][palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations. <p>In off-product communications, reference to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown in company records is allowed.</p> <p>Messaging NOT ALLOWED in storytelling in product-related communications:</p> <ul style="list-style-type: none"> • Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product. 	PT Inti Indosawit Subur – Buatan II POM was not apply storytelling in product.	Complied
Principle 4: Respect community and human rights and deliver benefit			
Respect community rights, provide equal opportunities, maximise benefits from engagement and ensure remediation where needed.			
Criteria 4.1: The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.			
4.1.1	<p>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, supply chain and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p>	The company has a corporate policy set on 14 July 2020 by Group Manager (GM) PT Inti Indosawit Subur – Group Buatan according to the Memorandum from GM No. 01/GM-Buatan/MEMO/VII/2020 dated 14 July 2020, related " <i>The policy prohibits any acts of revenge, intimidation and harassment for whistle-blowers / human rights defenders</i> " (Human Right Defender).	Complied

		<p>The policy relating to human rights, is explained in point 13, stating that: <i>"The company respects human rights by treating all employees fairly, both in terms of acceptance, valuation, conditions and working environment, as well as representation regardless of tribe, caste, national origin, religion/belief, disability, gender, sexual orientation, membership of trade union political affiliation and/or age".</i></p> <p>Corporate policy was socialized to all levels of PT IIS – Buatan Group employees on 10-12 February 2022 (list of participants can be shown during audit) and on stakeholders (including local contractors) on 23-24 March 2022 which was attended by 31 stakeholders.</p> <p>Scheme Smallholder:</p> <p>Plasma Buatan II in each KUD or Cooperative has organisation policy, for example: In KUD Mitra Usaha, KUD Makarti Sawit and KUD Bina Mulia, the Cooperative Policy was established on 11 February 2022, in KUD Mitra Usaha was set on 18 February 2022, in KUD Delima Sakti was set on 27 February 2020 and also in KUD Makarti Sawit was set on 13 February 2022, in which it contains the following:</p> <ol style="list-style-type: none"> 1) Compliance with regulation and law 2) Ethical behaviour in business (prohibition of all forms of corruption, bribery, fraud in the use of funds and resources) 3) Environmental pollution 4) Occupational Health and Safety 5) Prohibition of the practice of burning land, peat areas and forest areas 6) Respect defenders without giving threats or intimidation 7) Respect human rights defenders without making threats or intimidation prevents sexual harassment 8) Respect human rights by treating employees and peasants fairly and 	
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		<p>does not differentiate between ethnicity, caste, religion, and gender.</p> <p>9) Prohibition of employing children under the age of 18 in every plantation operational activity.</p> <p>The policy is also written in their farmer handbook "Buku Panduan Petani". The implementation of said policy in form of dissemination of anti-corruption policy, transparency in expenditure for road maintenance, fair calculation of worker payment, good quality FFB.</p>	
4.1.2	The unit of certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations.	<p>Based on the interview with stakeholder and documents review with the head of the Head of Simpang Perak Jaya and Kumbara Utama Village, Chief of Gender committee that PT IIS - Buatan Group, there is no any mercenaries and paramilitaries use in the operations.</p> <p>Up to this Surveillance audit, there is no issue or case related to the acts of violence against the employees of the company.</p>	Complied
Criteria 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.			
4.2.1	(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.	<p>Estate and Mill</p> <p>Company has established a mechanism to handle complaint from external party, as written in "<i>Mekanisme Penanganan Keluhan</i>" – complaint handling mechanism (Doc. No. SOP AA-GL-5005-RO-01) while complaint from internal regulated under "<i>Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan</i>" – Employee' complaint and resolution mechanism (Doc. No. SOP-AA-HR-3008-RO 05) and responded not more than 14 days. These mechanisms have communicated to external parties and disseminated to PT IIS employees. Based on interview with local communities, Gender committee leader and worker union leader; they understood the procedure and mechanism to communicating complaint and/or grievance to company.</p> <p>Corporate policy has been socialized/dissemination to all levels of PT IIS – Buatan Group employees on 10-12 February 2022 (list of participants</p>	Complied

		<p>can be shown during audit) and on stakeholders (including local contractors) on 23-24 March 2022 which was attended by 31 stakeholders.</p> <p>Scheme smallholders:</p> <p>The scheme smallholders have a mechanism of consultation and communication in "<i>Mekanisme Komunikasi, Konsultasi dan Keluhan</i>", dated 3rd January 2011. The procedure has been communicated to all members on 10 January 2022 and also recorded into the "Buku Pintar" for each of farmer</p>	
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.	<p>The procedure of <i>Mekanisme Penanganan Keluhan</i> is written in Bahasa and according to interview with management representatives and sustainability staff during the audit, there is no illiterate parties in estate, mill or scheme smallholders.</p> <p>Unit of Certification has established a mechanism to handle complaint from external party, as written in "<i>Mekanisme Penanganan Keluhan</i>" – complaint handling mechanism (Doc. No.SOP AA-GL- 5005-RO 01) while complaint from internal regulated under "<i>Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan</i>" – Employee' complaint and resolution mechanism (Doc. No.SOP-AA-HR-3008-RO 05). The procedure is how to handling complaint and grievances, the company keeps confidential complainer and whistleblower. Complaint and grievances is recorded in log Book and in "<i>Formulir Pencatatan Keluh Kesah dan Ketidakpuasan</i>". The company will endeavor to resolve complaints within 15 working days.</p> <p>These mechanisms has been communicated to external parties at the time conducting of communication and consultation with stakeholder, contractor and local communities on January 2022. While for the internal parties (all level employees at PT Inti Indosawit Subur – Buatan Group has been communicated on 19-21 January 2022 (list of participants can be shown during audit). Through this communication, the company</p>	Complied

		<p>explained about the mechanism of submission of complaints in detail and lasts in two directions (ask-answer/discussion), so if there are illiterate parties can understood.</p> <p>According to interview with management representatives and sustainability staff and also several of employees during the audit, there is no illiterate parties in estate, mill or scheme smallholders.</p>					
<p>4.2.3</p>	<p>The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.</p>	<p>Estate and Mill</p> <p>Company has established a mechanism to handle complaint from external party, as written in "Mekanisme Penanganan Keluhan" – complaint handling mechanism (Doc. No. SOP AA-GL-5005-RO-01 dated 22 August 2011) while complaint from internal regulated under "Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan" – Employee' complaint and resolution mechanism (Doc. No. SOP-AA-HR-3008-RO 05) and responded not more than 14 days. These mechanisms have communicated to external parties and disseminated to PT IIS employees.</p> <p>Certificate holder has had new procedure namely <i>SOP Penyampaian dan Penyelesaian Keluhan Karyawan</i> (SOP No: AA-HR-308.5-R1 effective dated 1 December 2019). This procedure also protected whistle blower anonymity. Referring to Asian Agri's website https://www.asianagri.com/id/panel-keberlanjutan/keluhan-pengaduan.</p> <p><i>Asian Agri is committed to responding quickly and constructively to any grievance raised against any of our own operations or our suppliers, and to report them publicly. We develop a robust grievance procedure to resolve all verifiable complaints and conflicts with all related stakeholders such as land conflicts, social conflicts, human right issues, labor issues, etc.</i></p> <table border="1" data-bbox="1093 1270 1944 1390"> <thead> <tr> <th data-bbox="1093 1270 1608 1321">Internal Reporting:</th> <th data-bbox="1608 1270 1944 1321">Channel/Remarks</th> </tr> </thead> <tbody> <tr> <td data-bbox="1093 1321 1608 1390"><i>There are log books located in all estates and mills managed by Asian Agri's</i></td> <td data-bbox="1608 1321 1944 1390"><i>Log Books:</i></td> </tr> </tbody> </table>	Internal Reporting:	Channel/Remarks	<i>There are log books located in all estates and mills managed by Asian Agri's</i>	<i>Log Books:</i>	<p>Complied</p>
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<i>There are log books located in all estates and mills managed by Asian Agri's</i>	<i>Log Books:</i>						

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		<p><i>business units. Employees are free to file concerns and reports in these log books, on matters related to Asian Agri's sustainability policy. Concerns on operation disruptions faced by employees may be documented in the Disruption Log Book. Issues pertaining to employee rights may be documented in the Complaint Log Book.</i></p>	<ul style="list-style-type: none"> • Disruption • Complaint 					
		<p><i>Confidential reports may be submitted through email or telephone to protect the identity of the reporter.</i></p>	<p><i>Poster on Whistleblowing is placed in every office of Asian Agri.</i></p> <ul style="list-style-type: none"> • Telephone: +62 811 910 7916 • Email: attention@asianagri.com 					
		<table border="1"> <thead> <tr> <th data-bbox="1093 975 1592 1023"><i>External Reporting:</i></th> <th data-bbox="1592 975 1951 1023"><i>Channel/Remarks</i></th> </tr> </thead> <tbody> <tr> <td data-bbox="1093 1023 1592 1369"> <p><i>Stakeholders of Asian Agri including but not limited to Government, smallholders, suppliers, vendors, academicians, NGOs, media, etc), are provided different channels to report their concerns/findings.</i></p> <p><i>Reporters may share their concerns and information on business misconduct, corruption, harassment, criminal acts, environment, etc.</i></p> </td> <td data-bbox="1592 1023 1951 1369"> <ul style="list-style-type: none"> • Email: grievance@asianagri.com • Address: Jl. MH Thamrin No. 31 Jakarta 10230 Indonesia </td> </tr> </tbody> </table>	<i>External Reporting:</i>	<i>Channel/Remarks</i>	<p><i>Stakeholders of Asian Agri including but not limited to Government, smallholders, suppliers, vendors, academicians, NGOs, media, etc), are provided different channels to report their concerns/findings.</i></p> <p><i>Reporters may share their concerns and information on business misconduct, corruption, harassment, criminal acts, environment, etc.</i></p>	<ul style="list-style-type: none"> • Email: grievance@asianagri.com • Address: Jl. MH Thamrin No. 31 Jakarta 10230 Indonesia 		
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		<p><i>All reports will be treated confidentially and if deemed appropriate, updates will be made publicly available as per our Grievance mechanism.</i></p>	<ul style="list-style-type: none"> • Fax: +62 21 230 1120 Attn.: Grievance Secretariat <p><i>Grievance submissions should be made using the Grievance Submission Form.</i></p>	
<p>This procedure is also applied to scheme smallholder operational. The procedure provides guidelines on handling grievances related to sustainability practices across our supply chain as well governance matters in our operations. The following grievance channels are available to support business transparency:</p> <p>The last socialization of SOP namely <i>SOP Penyampaian dan Penyelesaian Keluhan Karyawan</i> (SOP No: AA-HR-308.5-R1 effective dated 1 December 2019) was performed on 5-7 January 2022 and attended by 115 participants.</p> <p>Estate and Mill (including external)</p> <p>Based on document review of list of grievance in estate and mill Y2021 and 2022 there is 3 grievances from the workers, the grievances related to housing facilities that need to be repaired. The organization has responded to workers complaints according to the procedure and the grievances are no longer there. For external grievances, based on the review of the external grievances logbook, for Y2021 and 2022 there were no grievances to the organization.</p> <p>Scheme smallholders:</p> <p>The scheme smallholders have a mechanism of consultation and communication in "Mekanisme Komunikasi, Konsultasi dan Keluhan", dated 3rd January 2011. The procedure has been communicated to all</p>				

		<p>members on November 2019 and also recorded into the "Buku Pintar" for each of farmer.</p> <p>During this surveillance audit, according to the interview with several farmers on the field, that there is a grievance from farmers member related to the FFB prices for planting age more than 25 years. FFB prices for scheme smallholders is based on "Surat Edaran Harga TBS Dinas Perkebunan", however the price only regulated the price of planting with an age (years) of 4-25 years, for the age > 25 years the price follows the market price. In October 2021, scheme smallholder Buatun through FKPPKS (Forum Komunikasi Petani PIR Sawit Perkebunan Buatun) made a letter No. 003/FKPPKS-X/2021 regarding the application for plasma FFB prices. The organization (Buatun Plasma Manager) has held a meeting with FKPPKS related to FFB pricing on 22 October 2021 as follow up for the application and resulted in a FFB price agreement based on Letter No. 184/ES-KLB/EXT/10/2021 dated 22 October 2021, the letter has explained that the FFB price has been agreed and is valid until the replanting period. Based on this record, the organization has followed the complaint handling mechanism according to the procedure "Mekanisme Komunikasi, Konsultasi dan Keluhan".</p>	
4.2.4	<p>The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.</p>	<p>Company has established a mechanism to handle complaint from external party, "Mekanisme Penanganan Keluhan" – complaint handling mechanism (Doc. No. SOP AA-GL- 5005-RO 01). This procedure mentioned how the company solves the problem if any conflict occurred, both internal and external conflicts. This procedure also mentioned if the problem cannot be resolved by negotiation, the company will take legal action involving the related institution. Based on public consultation, this procedures have been socialized and accepted by local communities.</p> <p>In the event of a complaint that leads to a conflict with stakeholders, the company has established Procedures related to Conflict Handling SOP No. AA-GL-5003.1-R1 dated August 22, 2011, explains that:</p>	Complied

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		<p>After Public Relations (Humas: Hubungan Masyarakat) will receive conflict information (individuals, issues with surrounding communities, other representative institutions, media or newspapers), the company will analyse and map the problem through internal discussions (Estate manager, Managing Director, Regional Head and Stakeholder Relations), then Companies through Humas will provide opportunities access to relevant interested parties (Local Government, Legal Apparatus or legal advice) to obtain legal protection or independent technical assessments (Relevant agencies, for example: Plantation Service, National Land Agency-BPN). In this conflict resolution process, it is carried out through the FPIC process (making an agreement together with the conflicting party and or the institution) that represents it and if this does not meet an agreement, then litigation will be carried out or settlement through legal channels.</p> <p>Based on interviews with villages around the plantation, Simpang Perak Jaya Village Bpk. Rubiman Zianur, Kumbara Utama Village Bpk. Suroso Hadi and also interview with Plantation office and Environment Office of Pelalawan Regency on 8 June 2022, claimed that there were no complaints/disputes from the community around the plantation.</p> <p>During this surveillance audit, according the interview with several farmers on the ground, that there is no any grievance from farmers member. Although there is grievance which becomes an issue related to the FFB prices.</p> <p>In October 2021, scheme smallholder Buatan through FKPPKS (Forum Komunikasi Petani PIR Sawit Perkebunan Buatan) made a letter no. 003/FKPPKS-X/2021 regarding the application for plasma FFB prices.</p> <p>Buatan Plasma Manager has held a meeting with FKPPKS related to plasma FFB pricing on October 22, 2021 and resulted in a FFB price agreement based on Letter No. 184/ES-KLB/EXT/10/2021 dated October 22, 2021 claim Buatan Plasma FFB Market Pricing, mention that Market</p>	
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		pricing of FFB outside of PBS and PBD will take effect on October 22, 2021, until the replanting period.	
Criteria 4.3: The unit of certification contributes to local sustainable development as agreed by local communities.			
4.3.1	Contributions to community development that are based on the results of consultation with local community are demonstrated.	<p>Mill, Estate and Scheme Smallholder:</p> <p>PT IIS-Buatan Group has established a CSR program for the period 2020-2021, the determination of this CSR program is determined based on consultation/deliberation with the surrounding village community (village head) through the Deliberation of Plans and Development (Musrenbang Desa) in the period 2021-2022. MUSRENBANG – <i>Musyawah Perencanaan Pembangunan</i> for the period of 2022 has been conducted in January 2022 (for village planning period in 2022) at the surrounding villages. Musrenbang is a discussion forum between villagers conducted to discuss the problems and potential of the village to be well identified to provide a clear direction for appropriate actions according to the scale of priorities and implemented in addressing the problem or maximizing the potential that has as the basis of the village government's work program to carry out budgeting and annual activities of the village.</p> <p>Based on interviews with the village heads of Simpang Perak Jaya and Kumbara Utama Head Villages on 8 June 2022, that the annual CSR planning at The Buatan Group is always involves representatives of villages around the plantation through village development initiatives.</p>	Complied
Criteria 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.			
4.4.1	(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed (FPIC) process. Documents related to the history of land tenure and the actual legal or customary use of the land are available.	<p>Simpang Perak Estate:</p> <p>PT. Inti Indosawit Subur – Simpang Perak Estate has prepared a mechanism to identify and calculate fair compensation or loss of legal or customary rights to land set out in the standard operating procedure (SOP) "Prosedur Penyelesaian Sengketa Lahan No. AA-GL-5003-1-R2", dated 8th May 2015. The mechanism has taken into account FPIC Guide for RSPO Member 2015, whereby the procedure regulated information</p>	Complied

		<p>convey, negotiation, participative boundary measurement, involvement of other party and neighboring parties – in the boundary of the conflicted area (if any).</p> <p>Simpang Perak Estate and POM has obtained the legal ownership in the form of HGU, as follow:</p> <ul style="list-style-type: none"> - SK. HGU (Land Title), approved by “Menteri Negara Agraria/Kepala BPN No.10/HGU/1993, dated 13th May 1993 tentang Pemberian HGU atas nama PT. Inti Indosawit Subur, atas tanah di Kabupaten Kampar seluas 5,781.47 Ha”. - HGU (Land titles) No.01, 1993, dated June 19th, 1993. for Buatan Estate (5,781 Ha); - Renewal land title No.145/HGU/BPN/2004, dated November 3rd, 2004. Expired until 2058 from Head of BPN (5,781 Ha); <p>Scheme Smallholders:</p> <p>Based on interview, KUD Delima Sakti, KUD Mulus Rahayu, KUD Mitra Usaha, KUD Bina Mulia and KUD Makarti Sawit sampled smallholder member (farmer) and relevant authority, Plantation Agency of Siak District; there was no case of land conflict between smallholder member and/or conflict with other party related to land status or boundary.</p> <p>Cooperatives have a conflicts resolution mechanism in “Mekanisme Penanganan Konflik” dated 1 August 2014. The mechanism explaining flow process to resolution on land conflict, with involvement of company, village government and all related agencies.</p>	
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<p>4.4.2</p>	<p>Copies documents evidencing agreement- making processes and negotiated agreements detailing the FPIC process are available and include:</p> <p>4.4.2a Evidence that a plan has been developed through consultation and discussion held in good faith with all affected groups within the community, with specific assurances that vulnerable, minority and gender groups are asked for their opinions, and that information has been provided to all affected groups, including in it information about the steps taken to involve them in decision making.</p>	<p>Simpang Perak Estate and Scheme Smallholders:</p> <p>Based on documents review and interview with local government and local communities surrounding the company, it was noted that no customary land or other legal rights within the company areas and in smallholder plantation. In addition, there is no land dispute between the company and communities surrounding their operational areas.</p>	<p>Complied</p>
<p>4.4.2b Evidence that the unit of certification has respected communities to give or withhold their consent to the operations at the time that these decisions were taken;</p>	<p>Simpang Perak Estate and Scheme Smallholders:</p> <p>Based on documents review and interview with local government and local communities surrounding the company, it was noted that no customary land or other legal rights within the company areas and in smallholder plantation. In addition, there is no land dispute between the company and communities surrounding their operational areas.</p>		
<p>4.4.2c Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities. Including the implications for the legal status of their land at the expiry of the unit of certification’s title, concession or lease on the land.</p>	<p>Simpang Perak Estate and Scheme Smallholders:</p> <p>Based on documents review and interview with local government and local communities surrounding the company, it was noted that no customary land or other legal rights within the company areas and in smallholder plantation. In addition, there is no land dispute between the company and communities surrounding their operational areas.</p>		
<p>4.4.3</p>	<p>(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).</p>	<p>Simpang Perak Estate and Scheme Smallholders:</p> <p>Based on documents review and interview with local government and local communities surrounding the company, it was noted that no customary land or other legal rights within the company areas and in smallholder plantation. In addition, there is no land dispute between the company and communities surrounding their operational areas.</p> <p>Based on interviews with the village heads of Kumbara Utama and Simpang Perak Jaya, it was confirmed that the plantations of PT IIS-</p>	<p>Complied</p>

		Buatan Group bordered the land of the village community and that village communities were allowed access to pass through the plantation areas of PT IIS-Buatan Group (Simpang Perak Estate).	
4.4.4	All relevant information is available in appropriate forms and languages, including assessment of impact, proposed benefit sharing, and legal arrangements.	Simpang Perak Estate and Scheme Smallholders: Based on documents review and interview with local government and local communities surrounding the company, it was noted that no customary land or other legal rights within the company areas and in smallholder plantation. In addition, there is no land dispute between the company and communities surrounding their operational areas.	Complied
4.4.5	(C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.	Simpang Perak Estate and Scheme Smallholders: Based on documents review and interview with local government and local communities surrounding the company, it was noted that no customary land or other legal rights within the company areas and in smallholder plantation. In addition, there is no land dispute between the company and communities surrounding their operational areas.	Complied
4.4.6	There is evidence that implementation of agreement negotiated through FPIC is annually reviewed in consultation with affected parties.	Simpang Perak Estate and Scheme Smallholders: Based on documents review and interview with local government and local communities surrounding the company, it was noted that no customary land or other legal rights within the company areas and in smallholder plantation. In addition, there is no land dispute between the company and communities surrounding their operational areas.	Complied
Criteria 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.			
4.5.1	(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.	Estate and Smallholder: Note that there was no new planting in Simpang Perak Estate and the smallholders. All of the immature area was for replanting, for oil palm with planting year 1988, 1989, 1990, 1991.	Not Applicable

4.5.2	<p>(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions. All the relevant information and documents are made available, and community have option of resourced access to independent third-party advice through a documented, long-term and two- way process of consultation and negotiation.</p>	<p>Estate and Smallholder: Note that there was no new planting in Simpang Perak Estate and the smallholders. All of the immature area was for replanting, for oil palm with planting year 1988, 1989, 1990, 1991.</p>	Not Applicable
4.5.3	<p>Evidence is available that affected local peoples understand they have the right to say 'agree' or 'not agree' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p>	<p>Estate and Smallholder: Note that there was no new planting in Simpang Perak Estate and the smallholders. All of the immature area was for replanting, for oil palm with planting year 1988, 1989, 1990, 1991.</p>	Not Applicable
4.5.4	<p>To ensure local food and water security and as part of the FPIC process, SEIA participation and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of land allocations process.</p>	<p>Estate and Smallholder: Note that there was no new planting in Simpang Perak Estate and the smallholders. All of the immature area was for replanting, for oil palm with planting year 1988, 1989, 1990, 1991.</p>	Not Applicable
4.5.5	<p>Evidence is available that the affected communities and rights holders have had the option to access information and advice, that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.</p>	<p>Estate and Smallholder: Note that there was no new planting in Simpang Perak Estate and the smallholders. All of the immature area was for replanting, for oil palm with planting year 1988, 1989, 1990, 1991.</p>	Not Applicable
4.5.6	<p>Evidence is available that the communities or their representatives gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.</p>	<p>Estate and Smallholder:</p>	Not Applicable

		Note that there was no new planting in Simpang Perak Estate and the smallholders. All of the immature area was for replanting, for oil palm with planting year 1988, 1989, 1990, 1991.	
4.5.7	After 15 November 2018, new lands will not be acquired for plantations and mills as a result of recent (after November 2005) expropriations in the national interest (eminent domain) without FPIC process, except in cases of smallholders benefitting from agrarian reform or anti-drug programmes.	Estate and Smallholder: Note that there was no new planting in Simpang Perak Estate and the smallholders. All of the immature area was for replanting, for oil palm with planting year 1988, 1989, 1990, 1991.	Not Applicable
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation.	Estate and Smallholder: Note that there was no new planting in Simpang Perak Estate and the smallholders. All of the immature area was for replanting, for oil palm with planting year 1988, 1989, 1990, 1991.	Not Applicable
Criteria 4.6: Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			
4.6.1	(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.	Simpang Perak Estate: PT. Inti Indosawit Subur – Buatan has prepared a mechanism to identify and calculate fair compensation or loss of legal or customary rights to land set out in the standard operating procedure (SOP) “Prosedur Penyelesaian Sengketa Lahan No.AA-GL-5003-1-R2”, dated 8th May 2015. The mechanism has taken into account FPIC Guide for RSPO Member 2015, whereby the procedure regulated information convey, negotiation, participative boundary measurement, involvement of other party and neighboring parties – in the boundary of the conflicted area (if any). Scheme Smallholders: Cooperatives have a conflicts resolution mechanism in “Mekanisme Penanganan Konflik” dated 1st August 2014. The mechanism explaining flow process to resolution on land conflict, with involvement of company, village government and all related agencies.	Complied

		<p>Based on interview, KUD Delima Sakti, KUD Mitra Usaha, KUD Bina Mulia and KUD Makarti Sawit sampled smallholder member (farmer) and relevant authority, Plantation Agency of Siak District; there was no case of land conflict between smallholder member and/or conflict with other party related to land status or boundary.</p>	
<p>4.6.2</p>	<p>(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p>	<p>Simpang Perak Estate: PT. Inti Indosawit Subur – Buatan II has prepared a mechanism to identify and calculate fair compensation or loss of legal or customary rights to land set out in the standard operating procedure (SOP) “Prosedur Penyelesaian Sengketa Lahan No.AA-GL-5003-1-R2”, dated 8th May 2015. The mechanism has taken into account FPIC Guide for RSPO Member 2015, whereby the procedure regulated information convey, negotiation, participative boundary measurement, involvement of other party and neighboring parties – in the boundary of the conflicted area (if any). There is no new planting within certified area of PT Inti Indosawit Subur – Simpang Perak Estate and Buatan II Plasma after November 2005. Currently, replanting activities are still in progress. All of the immature area was for replanting, for oil palm with planting year 1988, 1989, 1990 and 1991.</p> <p>Scheme Smallholders: Based on interview, KUD Delima Sakti, KUD Mitra Usaha, KUD Bina Mulia and KUD Makarti Sawit sampled smallholder member (farmer) and relevant authority, Plantation Agency of Siak District; there was no case of land conflict between smallholder member and/or conflict with other party related to land status or boundary. Cooperatives have a conflicts resolution mechanism in “Mekanisme Penanganan Konflik” dated 1st August 2014. The mechanism explaining flow process to resolution on land conflict, with involvement of company, village government and all related agencies.</p>	<p>Complied</p>

4.6.3	Evidence is available that equal opportunities are provided to both men and women to hold land titles for smallholdings (if possible based on local law, customs and/or agreement).	Based on documents review and interview with local government and local communities surrounding the company, it was noted that no customary land or other legal rights within the company areas and in smallholder plantation.	Complied
4.6.4	The process and outcomes of any negotiated agreements, compensation and payments are documented with evidence of the participation of affected parties and made available to them.	<p>Simpang Perak Estate: Based on stakeholder consultation, there is no expansion plan in business plan. There is no land conflict between PT. Inti Indosawit Subur – Buatan with other party including with surrounding village.</p> <p>Scheme smallholder: The Scheme Smallholder area of PT. Inti Indosawit Subur – Buatan was included in government program for “Perkebunan Inti Rakyat – Transmigrasi/PIR-Trans” as per “Keputusan menteri Transmigrasi No.Kep.90/MEN/1990 tentang Izin Pelaksanaan Transmigrasi PIR-Trans kepada PT. Inti Indosawit Subur I dengan Komoditas Kelapa Sawit di Lokasi Pangkalan Kuras, Kabupaten Kampar dan Pasir Penyau, Kabupaten Indragiri Hulu, Provinsi Riau” dated 29th July 1991.</p> <p>From this background, it was understood the scheme smallholder obtained the land ownership through government program PIR-Trans. Therefore it was not gone through compensation process to previous traditional landowners because the land was state land, free from ownership right. Currently, all scheme smallholder members have been granted with “Sertifikat Hak Milik/SHM” (land title) from “Badan Pertanahan Nasional /BPN”.</p>	Complied
Criteria 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.			
4.7.1	(C) A mutually agreed procedure for identifying people entitled to compensation is in place.	<p>Simpang Perak Estate: PT. Inti Indosawit Subur – Buatan II has prepared a mechanism to identify and calculate fair compensation or loss of legal or customary rights to land set out in the standard operating procedure (SOP) “Prosedur Penyelesaian</p>	Complied

		<p>Sengketa Lahan No.AA-GL-5003-1-R2”, dated 8th May 2015. The mechanism has taken into account FPIC Guide for RSPO Member 2015, whereby the procedure regulated information convey, negotiation, participative boundary measurement, involvement of other party and neighboring parties – in the boundary of the conflicted area (if any).</p> <p>Scheme Smallholders:</p> <p>Based on interview, KUD Delima Sakti, KUD Mulus Rahayu, KUD Mitra Usaha, KUD Bina Mulia and KUD Makarti Sawit sampled smallholder member (farmer) and relevant authority, Plantation Agency of Siak District; there was no case of land conflict between smallholder member and/or conflict with other party related to land status or boundary.</p> <p>Cooperatives have a conflicts resolution mechanism in “Mekanisme Penanganan Konflik” dated 1st August 2014. The mechanism explaining flow process to resolution on land conflict, with involvement of company, village government and all related agencies.</p>	
4.7.2	<p>(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.</p>	<p>Simpang Perak Estate:</p> <p>PT. Inti Indosawit Subur – Buatan has prepared a mechanism to identify and calculate fair compensation or loss of legal or customary rights to land set out in the standard operating procedure (SOP) “Prosedur Penyelesaian Sengketa Lahan No.AA-GL-5003-1-R2”, dated 8th May 2015. The mechanism has taken into account FPIC Guide for RSPO Member 2015, whereby the procedure regulated information convey, negotiation, participative boundary measurement, involvement of other party and neighboring parties – in the boundary of the conflicted area (if any).</p> <p>The procedure covers land dispute handling mechanism, negotiation process, and verification upon legal ownership evidence up to land compensation. Should negotiation process fails, any land dispute will be processed through legal/litigation mechanism. During the process, a complete record is maintained.</p>	Complied

		<p>Based on mechanism, public relation officer will receive information of any complaint, grievance and land dispute/claims and records under the logbook.</p> <p>PT IIS-Buatan II POM & Estate have not acquiring any additional land and not involved in any land compensation payments. Therefore the mechanism only applicable to resolve land dispute within company's HGU. Land ownership from previous landowner becomes important document in order to continue negotiation process against land claim. Land claim without supporting evidence of land ownership, will be treated with approach and legal manner.</p> <p>There is no negotiation/compensation payment currently for both estate and scheme smallholders. The land has settled now, no any complaint was received in the last few years. In Scheme smallholder's area, it was settled since the "PIR Project" started due to this project from Central Government, where the land status is "Clean and Clear".</p> <p>Based on the results of interviews with the Environment Agency (Dinas Lingkungan Hidup) and Plantation Agency (Dinas Perkebunan) of Pelalawan Regency, there is no land dispute between PT IIS – Buatan and the ownership of the surrounding community.</p> <p>Scheme Smallholders:</p> <p>Based on interview, KUD Delima Sakti, KUD Mulus Rahayu, KUD Mitra Usaha, KUD Bina Mulia and KUD Makarti Sawit sampled smallholder member (farmer) and relevant authority, Plantation Agency of Siak District; there was no case of land conflict between smallholder member and/or conflict with other party related to land status or boundary</p> <p>Cooperatives have a conflicts resolution mechanism in "Mekanisme Penanganan Konflik" dated 1st August 2014. The mechanism explaining flow process to resolution on land conflict, with involvement of company, village government and all related agencies.</p>	
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		<p>There is no new planting within certified area of PT Inti Indosawit Subur – Simpang Perak Estate and Buatan II Plasma after November 2005. Currently, replanting activities are still in progress. All of the immature area was for replanting, for oil palm with planting year 1988, 1989, 1990 and 1991.</p>	
<p>4.7.3</p>	<p>Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.</p>	<p>Simpang Perak Estate: PT. Inti Indosawit Subur – Buatan has prepared a mechanism to identify and calculate fair compensation or loss of legal or customary rights to land set out in the standard operating procedure (SOP) “Prosedur Penyelesaian Sengketa Lahan No.AA-GL-5003-1-R2”, dated 8th May 2015. The mechanism has taken into account FPIC Guide for RSPO Member 2015, whereby the procedure regulated information convey, negotiation, participative boundary measurement, involvement of other party and neighboring parties – in the boundary of the conflicted area (if any). Based on mechanism, public relation officer will receive information of any complaint, grievance and land dispute/claims and records under the logbook. PT IIS-Buatan II POM & Estate have not acquiring any additional land and not involved in any land compensation payments. Therefore the mechanism only applicable to resolve land dispute within company’s HGU. Land ownership from previous landowner becomes important document in order to continue negotiation process against land claim. Land claim without supporting evidence of land ownership, will be treated with approach and legal manner. There is no negotiation/compensation payment currently for both estate and scheme smallholders. The land has settled now, no any complaint was received in the last few years. In Scheme smallholder’s area, it was settled since the “PIR Project” started due to this project from Central Government, where the land status is “Clean and Clear”.</p>	<p>Complied</p>

		<p>Based on the results of interviews with the Environment Agency (Dinas Lingkungan Hidup) and Plantation Agency (Dinas Perkebunan) of Pelalawan Regency, there is no land dispute between PT IIS – Buatan and the ownership of the surrounding community.</p> <p>The company provides opportunities and priorities for the surrounding community to get the right to work on the plantations of PT IIS - Buatan Group. Also the company has created an economic development and social responsibility program for the surrounding community in the form of a CSR program every year.</p> <p>Scheme Smallholders:</p> <p>Based on interview, KUD Delima Sakti, KUD Mulus Rahayu, KUD Mitra Usaha, KUD Bina Mulia and KUD Makarti Sawit sampled smallholder member (farmer) and relevant authority, Plantation Agency of Siak District; there was no case of land conflict between smallholder member and/or conflict with other party related to land status or boundary.</p> <p>Cooperatives have a conflicts resolution mechanism in “Mekanisme Penanganan Konflik” dated 1st August 2014. The mechanism explaining flow process to resolution on land conflict, with involvement of company, village government and all related agencies.</p> <p>There is no new planting within certified area of PT Inti Indosawit Subur – Simpang Perak Estate and Buatan II Plasma after November 2005. Currently, replanting activities are still in progress. All of the immature area was for replanting, for oil palm with planting year 1988, 1989, 1990 and 1991.</p>	
<p>Criteria 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrated that they have legal customary, or user rights.</p>			
<p>4.8.1</p>	<p>Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that</p>	<p>Simpang Perak Estate and Scheme Smallholders:</p> <p>Based on documents review and interview with local government and local communities surrounding the company, it was noted that no customary land or legal rights within the company and scheme smallholder’s areas.</p>	<p>Complied</p>

	<p>any compensation was accepted following a documented process of FPIC.</p>	<p>All company plantation and scheme smallholder area have been issued with valid land title in the form of "Hak Guna Usaha/HGU" for company and "Sertifikat Hak Milik" for smallholder.</p> <p>Based on interview with Farmer Group No. 185 (KUD Makarti Sawit) and plots No. 4868 and No. 4869 and also with farmer group No. 119 (KUD Tani Rukun) plots No. 4556, No. 4557 and No. 4583, the boundary markers between smallholder block, as well as boundary markers with neighbouring farmer group has been established. There was no land dispute noted.</p>	
<p>4.8.2</p>	<p>(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.</p>	<p>Simpang Perak Estate and Scheme Smallholder:</p> <p>PT. Inti Indosawit Subur – Buatan has prepared a mechanism to identify and calculate fair compensation or loss of legal or customary rights to land set out in the standard operating procedure (SOP) "Prosedur Penyelesaian Sengketa Lahan No.AA-GL-5003-1-R2", dated 8th May 2015. The mechanism has taken into account FPIC Guide for RSPO Member 2015, whereby the procedure regulated information convey, negotiation, participative boundary measurement, involvement of other party and neighboring parties – in the boundary of the conflicted area (if any).</p> <p>Based on mechanism, public relation officer will receive information of any complaint, grievance and land dispute/claims and records under the logbook.</p> <p>PT IIS-Buatan II POM & Estate have not acquiring any additional land and not involved in any land compensation payments. Therefore the mechanism only applicable to resolve land dispute within company's HGU. Land ownership from previous landowner becomes important document in order to continue negotiation process against land claim. Land claim without supporting evidence of land ownership, will be treated with approach and legal manner.</p> <p>There is no negotiation/compensation payment currently for both estate and scheme smallholders. The land has settled now, no any complaint</p>	<p>Complied</p>

		<p>was received in the last few years. In Scheme smallholder's area, it was settled since the "PIR Project" started due to this project from Central Government, where the land status is "Clean and Clear".</p> <p>Based on the results of interviews with the Environment Agency (Dinas Lingkungan Hidup) and Plantation Agency (Dinas Perkebunan) of Pelalawan Regency, there is no land dispute between PT IIS – Buatan and the ownership of the surrounding community.</p> <p>Based on interview with Farmer Group No. 185 (KUD Makarti Sawit) and plots No. 4868 and No. 4869 and also with farmer group No. 119 (KUD Tani Rukun) plots No. 4556, No. 4557 and No. 4583, the boundary markers between smallholder block, as well as boundary markers with neighbouring farmer group has been established. There was no land dispute noted.</p>	
4.8.3	<p>Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4).</p>	<p>Simpang Perak Estate and Scheme Smallholder:</p> <p>PT. Inti Indosawit Subur – Buatan has prepared a mechanism to identify and calculate fair compensation or loss of legal or customary rights to land set out in the standard operating procedure (SOP) "Prosedur Penyelesaian Sengketa Lahan No.AA-GL-5003-1-R2", dated 8th May 2015. The mechanism has taken into account FPIC Guide for RSPO Member 2015, whereby the procedure regulated information convey, negotiation, participative boundary measurement, involvement of other party and neighboring parties – in the boundary of the conflicted area (if any).</p> <p>Based on mechanism, public relation officer will receive information of any complaint, grievance and land dispute/claims and records under the logbook.</p> <p>PT IIS-Buatan II POM & Estate have not acquiring any additional land and not involved in any land compensation payments. Therefore the mechanism only applicable to resolve land dispute within company's HGU. Land ownership from previous landowner becomes important document in order to continue negotiation process against land claim. Land claim</p>	Complied

		<p>without supporting evidence of land ownership, will be treated with approach and legal manner.</p> <p>There is no negotiation/compensation payment currently for both estate and scheme smallholders. The land has settled now, no any complaint was received in the last few years. In Scheme smallholder's area, it was settled since the "PIR Project" started due to this project from Central Government, where the land status is "Clean and Clear".</p> <p>Based on the results of interviews with the Environment Agency (Dinas Lingkungan Hidup) and Plantation Agency (Dinas Perkebunan) of Pelalawan Regency, there is no land dispute between PT IIS – Buatan and the ownership of the surrounding community.</p> <p>Based on interview with Farmer Group No. 185 (KUD Makarti Sawit) and plots No. 4868 and No. 4869 and also with farmer group No. 119 (KUD Tani Rukun) plots No. 4556, No. 4557 and No. 4583, the boundary markers between smallholder block, as well as boundary markers with neighbouring farmer group has been established. There was no land dispute noted.</p>	
4.8.4	<p>For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable).</p>	<p>Simpang Perak Estate and Scheme Smallholder:</p> <p>PT. Inti Indosawit Subur – Buatan has prepared a mechanism to identify and calculate fair compensation or loss of legal or customary rights to land set out in the standard operating procedure (SOP) "Prosedur Penyelesaian Sengketa Lahan No.AA-GL-5003-1-R2", dated 8th May 2015. The mechanism has taken into account FPIC Guide for RSPO Member 2015, whereby the procedure regulated information convey, negotiation, participative boundary measurement, involvement of other party and neighboring parties – in the boundary of the conflicted area (if any).</p> <p>Based on mechanism, public relation officer will receive information of any complaint, grievance and land dispute/claims and records under the logbook.</p>	Complied

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		<p>PT IIS-Buatan II POM & Estate have not acquiring any additional land and not involved in any land compensation payments. Therefore the mechanism only applicable to resolve land dispute within company's HGU. Land ownership from previous landowner becomes important document in order to continue negotiation process against land claim. Land claim without supporting evidence of land ownership, will be treated with approach and legal manner.</p> <p>There is no negotiation/compensation payment currently for both estate and scheme smallholders. The land has settled now, no any complaint was received in the last few years. In Scheme smallholder's area, it was settled since the "PIR Project" started due to this project from Central Government, where the land status is "Clean and Clear".</p> <p>Based on the results of interviews with the Environment Agency (Dinas Lingkungan Hidup) and Plantation Agency (Dinas Perkebunan) of Pelalawan Regency, there is no land dispute between PT IIS – Buatan and the ownership of the surrounding community.</p> <p>Based on interview with Farmer Group No. 185 (KUD Makarti Sawit) and plots No. 4868 and No. 4869 and also with farmer group No. 119 (KUD Tani Rukun) plots No. 4556, No. 4557 and No. 4583, the boundary markers between smallholder block, as well as boundary markers with neighbouring farmer group has been established. There was no land dispute noted.</p>	
<p>Principle 5: Support smallholder inclusion</p>			
<p>Include smallholders in RSPO supply chains and improve their livelihoods through fair and transparent partnerships.</p>			
<p>Criteria 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.</p>			
<p>5.1.1</p>	<p>Current and previous period prices for FFB are publicly available and accessible by smallholders.</p>	<p>Based on interview with management representative i.e.. public affair staff, sustainability and plasma manager obtained information that the actual prices informed directly to the board of plasma or other FFB</p>	<p>Complied</p>

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		<p>supplier. The actual prices also informed by social media messenger such as WhatsApp or by phone call.</p> <p>During the audit, Kebun Plasma Buatan has showed the FFB payment receipt period May 2022 in accordance with official FFB price that issued by FFB Pricing Team of Riau Province. All smallholder classified as up to 25 year which is the lower price due to the extraction that diminished. Sighted the payments record of KUD Mulus Rahayu, KUD Tani Rukun, KUD Mitra Uaha and KUD Makarti Sawit period May 2022. All payments have been complied with the pricing that stipulated by FFB Pricing Team of Riau Province.</p>	
5.1.2	(C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.	<p>Based on document verification of Memorandum of Understanding (MoU) between the smallholders/KUD and PT Inti Indosawit Subur obtain information that the FFB pricing has followed the official FFB price stipulated by FFB Pricing Team of Riau Province. According to the local regulation in Riau Province, the FFB Price updated weekly (every 7 days). The FFB payments conducted monthly, for example, there was a receipt of FFB payments period of May 2022 on behalf of KUD Mulus Rahayu, KUD Tani Rukun, KUD Mitra Usaha and KUD Makarti Sawit.</p>	Complied
5.1.3	(C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.	<p>Management of PT Inti Indosawit Subur – Buatan Group has a commitment to share the RSPO premium price in accordance with the agreement with their smallholder. Premium sharing is not distributed in the form of money but in the form of smallholder empowerment activities aimed at increasing the competence and competitiveness of smallholders based on participatory suggest from the smallholders.</p> <p>During this audit obtained information that the premium sharing for Buatan Plasma period 2021 has been handover in December 2021. Buatan Plasma using that fund for:</p> <ul style="list-style-type: none"> • Installation of boundary poles • Providing PPE for harvester 	Complied

		<ul style="list-style-type: none"> • Alternative income (cattle) • Purchasing the stationery and office equipment. <p>Based on interview with the smallholder’s representatives known that the training has given the positive insight to the smallholders to facing the replanting period. Some smallholders have prepared the alternative income during the replanting with other business such as quail farm, goat and cows and domestic waste composting.</p>	
5.1.4	(C) Evidences is available that all parties, including women and independent representative organization assisting smallholders where requested, are involved in the decision making processes and understand the contracts. These include involving finance, loans/credits, and re-payments through FFB price reductions for replanting and/or, other support mechanisms where applicable.	The smallholder’s member of Buatan Plasma originated from government transmigration program on 1990 – 1991. Mostly from East Java, West Java and local area (Riau Province). Based on information obtained during the onsite audit known that some of smallholders’ member were women. The annual meeting of KUD always invited all members which is some women. All the decision made was involved the smallholder members, including women members.	Complied
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe.	<p>Based on interview with management representative ie. Public affair staff, sustainability and plasma manager obtained information that all the contract is signed by both parties.</p> <p>Through the interview with FFB supplier of CV Mandiri Sentosa PBD-R (supplied to Buatan II POM) obtained information that the FFB price only updated if any changes. However, the FFB payments maximum 3 days after the mill received the FFB (according to the contract). There is no dispute related to FFB payments so far.</p> <p>Based on document all contracts are written in Bahasa Indonesia.</p>	Complied
5.1.6	(C) Agreed payments are made in a timely manner and receipts specifying price, weigh, deductions and amount paid are given.	<p>Based on document verification sighted that monthly invoice for FFB payment contains data of price, weigh, deductions and amount paid are given.</p> <p>Through the interview with FFB supplier of CV Mandiri Sentosa PBD-R (supplied to Buatan II POM) obtained information that the FFB price only updated if any changes. However, the FFB payments maximum 3 days</p>	Complied

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		after the mill received the FFB (according to the contract). There is no dispute related to FFB payments so far.	
5.1.7	Weighing equipment is verified by an independent third party on a regular basis.	<p>Weighbridge in Buatan I POM is verified by government agency in annual basis. Latest verification was performed on 09 September 2021 by UPTD METROLOGI LEGAL Dinas Perindustrian dan Perdagangan Kabupaten Siak. Weighbridges calibration certificate were sighted during audit:</p> <ul style="list-style-type: none"> • Surat Keterangan Hasil Pengujian Nomor: 510/DPP/UPTD-ML/SKHP/2021-IX/176, dated 15 September 2021, valid until 09 September 2022. Weighbridge Avery weigh Tronix; Serial Number 171050118; Type: E1205; Capacity 50,000 kg. • Surat Keterangan Hasil Pengujian Nomor: 510/DPP/UPTD-ML/SKHP/2021-IX/177, dated 15 September 2021, valid until 09 September 2022. Weighbridge Avery weigh Tronix; Serial Number 112850291; Type: E1205; Capacity 50,000 kg. <p>According to certificate it was noted that verification results were comply to requirement, endorsed based on UU RI No. 2 Year 1981 concerning Metrology Legal.</p>	Complied
5.1.8	The unit of certification supports Independent smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholder on who runs the Internal Controlling System (ICS), who holds the certificate, and who owns and sells certified materials.	<p>Based on review of agreement, the company carried out the development and provide supervision in KUD (Scheme Smallholder). The company support KUD in form of supervision in upkeep, fertilizer application, harvesting, FFB transport and implementation of RSPO P&C requirements. For independent Smallholder, supports is provided in the form of CSV Program (Create Share Value). Form of support is the company give coaching to the independent smallholder related good agriculture practices, organisation and administration. Those independent smallholders expected to be certified in next few years.</p>	Complied
5.1.9	(C) The unit of certification has a grievance mechanism for smallholders, and all grievances raised are dealt with in a timely manner.	<p>Simpang Perak Estate and Mill</p> <p>Company has established a mechanism to handle complaint from external party, as written in "Mekanisme Penanganan Keluhan" – complaint</p>	Complied

handling mechanism (Doc. No. SOP AA-GL-5005-RO-01 dated 22 August 2011) while complaint from internal regulated under “Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan” – Employee’ complaint and resolution mechanism (Doc. No. SOP-AA-HR-3008-RO 05) and responded not more than 14 days. These mechanisms have communicated to external parties and disseminated to PT IIS employees. Certificate holder has had new procedure namely *SOP Penyampaian dan Penyelesaian Keluhan Karyawan* (SOP No: AA-HR-308.5-R1 effective dated 1 December 2019). This procedure also protected whistle blower anonymity. Referring to Asian Agri’s website <https://www.asianagri.com/id/panel-keberlanjutan/keluhan-engaduan>.

Asian Agri is committed to responding quickly and constructively to any grievance raised against any of our own operations or our suppliers, and to report them publicly. We develop a robust grievance procedure to resolve all verifiable complaints and conflicts with all related stakeholders such as land conflicts, social conflicts, human right issues, labor issues, etc.

Internal Reporting:	Channel/Remarks
<p><i>There are log books located in all estates and mills managed by Asian Agri’s business units. Employees are free to file concerns and reports in these log books, on matters related to Asian Agri’s sustainability policy. Concerns on operation disruptions faced by employees may be documented in the Disruption Log Book. Issues pertaining to employee rights may be documented in the Complaint Log Book.</i></p>	<p><i>Log Books:</i></p> <ul style="list-style-type: none"> • <i>Disruption</i> • <i>Complaint</i>

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		<p><i>Confidential reports may be submitted through email or telephone to protect the identity of the reporter.</i></p>	<p><i>Poster on Whistleblowing is placed in every office of Asian Agri.</i> <i>Telephone: +62 811 910 7916</i> <i>Email: attention@asianagri.com</i></p>				
		<table border="1"> <thead> <tr> <th data-bbox="1077 671 1610 719">External Reporting:</th> <th data-bbox="1610 671 1951 719">Channel/Remarks</th> </tr> </thead> <tbody> <tr> <td data-bbox="1077 719 1610 1249"> <p><i>Stakeholders of Asian Agri including but not limited to Government, smallholders, suppliers, vendors, academicians, NGOs, media, etc), are provided different channels to report their concerns/findings.</i></p> <p><i>Reporters may share their concerns and information on business misconduct, corruption, harassment, criminal acts, environment, etc.</i></p> <p><i>All reports will be treated confidentially and if deemed appropriate, updates will be made publicly available as per our Grievance mechanism.</i></p> </td> <td data-bbox="1610 719 1951 1249"> <ul style="list-style-type: none"> • <i>Email: grievance@asianagri.com</i> • <i>Address: Jl. MH Thamrin No. 31 Jakarta 10230 Indonesia</i> • <i>Fax: +62 21 230 1120 Attn.: Grievance Secretariat Grievance submissions should be made using the Grievance Submission Form.</i> </td> </tr> </tbody> </table>	External Reporting:	Channel/Remarks	<p><i>Stakeholders of Asian Agri including but not limited to Government, smallholders, suppliers, vendors, academicians, NGOs, media, etc), are provided different channels to report their concerns/findings.</i></p> <p><i>Reporters may share their concerns and information on business misconduct, corruption, harassment, criminal acts, environment, etc.</i></p> <p><i>All reports will be treated confidentially and if deemed appropriate, updates will be made publicly available as per our Grievance mechanism.</i></p>	<ul style="list-style-type: none"> • <i>Email: grievance@asianagri.com</i> • <i>Address: Jl. MH Thamrin No. 31 Jakarta 10230 Indonesia</i> • <i>Fax: +62 21 230 1120 Attn.: Grievance Secretariat Grievance submissions should be made using the Grievance Submission Form.</i> 	
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		<p>This procedure is also applied to scheme smallholder operational. The procedure provides guidelines on handling grievances related to sustainability practices across our supply chain as well governance</p>					

		<p>matters in our operations. The following grievance channels are available to support business transparency:</p> <p>This mechanism has been socialized/disseminated to all levels of PT IIS – on 10-12 February 2021 (list of participants can be shown) and on stakeholders (including local contractors) on 23-24 March 2021 which was attended by 31 stakeholders. Evidence of socialization can be shown during audit.</p> <p>Scheme smallholders:</p> <p>The scheme smallholders have a mechanism of consultation and communication in “Mekanisme Komunikasi, Konsultasi dan Keluhan”, dated 3rd January 2011. The procedure has been communicated to all members on November 2019 and also recorded into the “Buku Pintar” for each of farmer.</p> <p>During this surveillance audit, according to the interview with several farmers on the field, that there is a grievance from farmers member related to the FFB prices for planting age more than 25 years. FFB prices for scheme smallholders is based on “Surat Edaran Harga TBS Dinas Perkebunan”, however the price only regulated the price of planting with an age (years) of 4-25 years, for the age > 25 years the price follows the market price. In October 2021, scheme smallholder Buatana through FKPPKS (Forum Komunikasi Petani PIR Sawit Perkebunan Buatana) made a letter No. 003/FKPPKS-X/2021 regarding the application for plasma FFB prices. The organization (Buatana Plasma Manager) has held a meeting with FKPPKS related to FFB pricing on 22 October 2021 as follow up for the application and resulted in a FFB price agreement based on Letter No. 184/ES-KLB/EXT/10/2021 dated 22 October 2021, the letter has explained that the FFB price has been agreed and is valid until the replanting period.</p> <p>Based on this record, the organization has followed the complaint handling mechanism according to the procedure “Mekanisme Komunikasi, Konsultasi dan Keluhan”.</p>	
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Criteria 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.		
5.2.1	The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification.	<p>PT IIS-Buatan Group always communicates with interested smallholders including women farmers to support their livelihoods especially those related to RSPO certification. Some of the company's activities that can be considered as supporting activities towards interested smallholders, among them:</p> <ul style="list-style-type: none"> • OHS (Job Safety Analysys), conducted on 25 May 2022, attended by 45 farmers. • First Aid Training, conducted on 25 May 2022, attended by 45 farmers. • Basic Fire, conducted on 31 March 2022, attended by 112 farmers. • HCV awareness, conducted on 4 May 2022, attended by 122 farmers. • Limited Pesticide Application (refresh), conducted on 4 May 2022, attended by 122 farmers. • Harvesting, Weed Control & IPM (refresh), conducted on 4 May 2022, by attended by 122 farmers.
5.2.2	The unit of certification develops and implements livelihood improvement programmes, including at least capacity building to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder).	<p>PT Inti Indosawit Subur – Buatan Group sets a scheme manager, with field assistant assigned for each cooperative to improve smallholder management, including productivity. Each year, company provisioned training program, aside from day-to-day operation monitoring by field assistant, e.g.:</p> <ul style="list-style-type: none"> • OHS (Job Safety analysis), conducted on 25 May 2022, attended by 45 farmers. • First Aid Training, conducted on 25 May 2022, attended by 45 farmers. • Basic Fire, conducted on 31 March 2022, attended by 112 farmers. • HCV awareness, conducted on 4 May 2022, attended by 122 farmers.

		<ul style="list-style-type: none"> Limited Pesticide Application (refresh), conducted on 4 May 2022, attended by 122 farmers. Harvesting, Weed Control & IPM (refresh), conducted on 4 May 2022, by attended by 122 farmers. 	
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	<p>Buatan II POM supplied by own estates (Simpang Perak Estate), smallholder from 9 KUD's with total 2,822 smallholders and third party's supplier. Based on interview with smallholder representatives from KUD Mulus Rahayu, KUD Tani RUKun, KUD Mitra Usaha and KUD Makarti Sawi obtain information that entire land has been granted by government (private land title/SHM).</p> <p>According to the signboard in mill's gate, Buatan II POM does not accept FFB from illegal sources (forest area or crop stolen). All FFB from third parties shall comply with regulation. Mill's staff told that FFB Purchasing Department has set the procedures for their supplier as follows:</p> <ul style="list-style-type: none"> New supplier shall propose their FFB purchased offer including submitted the name and land legality of each potential farmer. FFB Purchasing Department verify the geolocation of potential farmer that submitted by the third parties. New supplier shall sign the agreement which stated to not send illegal FFB sources. This agreement will automatically be cancelled if any violation on this clause. The FFB transporter shall signed the zero illegal FFB statement letter in security gate in each delivery note. <p>Based on interview with smallholder representatives from KUD Mulus Rahayu, KUD Tani RUKun, KUD Mitra Usaha and KUD Makarti Sawit obtain information that entire land has been granted by government (private land title). Asian Agri's through his subsidiary PT. Inti Indosawit Subur fully supported their smallholder to be certified by ensuring all FFB come from legal sources and comply with national regulation. They also</p>	Complied

		<p>conducted good engagement to demonstrated best management practices in agronomy, environmental handling and safety procedures. For example, each plot received 4 unit barn owl box to help them control rat population.</p> <p>During the audit, auditor also obtain information that PT. Inti Indosawit Subur are now assisting the smallholders on replanting project in collaborated with local government. This aims to ensure that farmers produce palm oil sustainably.</p>	
5.2.4	<p>(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.</p>	<p>Certificate Holder has assigned chemical weeding team (Tim Unit Semprot/TUS) in each estate/unit to handling chemical weeding activity. The team member originated from own workers (for own estate) and local communities (for smallholder). They regularly attended training on pesticide handling that conducted by the pesticide supplier in collaboration with local pesticide committee.</p> <p>Based on document review and interview with random pesticide applicator known that they were attending the last training on pesticide handling on 24 May 2019. Some topic that discuss such as safety pesticide handling, national regulation related to pesticide, symbol and label awareness and emergency procedure if any contamination or poisonous.</p> <p>During the audit, auditor also interviewed some smallholder representatives and obtain information that the company has provide training session for them on how to be handling pesticide safely. For example, pesticide applicator shall use appropriate PPE during application, no smoke, avoid the direction of wind blows and cleaned their body after application to reduce contamination.</p>	Complied
5.2.5	<p>The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.</p>	<p>Annual review of progress of the smallholder support by Asian Agri's is publicly available and can be downloaded from Asian Agri's website https://www.asianagri.com/id/panel-keberlanjutan/laporan-keberlanjutan.</p>	Complied

		<p>Plasma manager (KLB) also described that PT Inti Indosawit Subur helped the smallholder based on monthly management review of smallholder performance as follows:</p> <ul style="list-style-type: none"> • Assisted the KUD's to achieve the production and upkeep target. Until this audit, plasma area has been achieved 5% above the target. • Assisting the KUD's in replanting program. Until this audit, there is a record of approval by smallholder member in some KUD's. PT Inti Indosawit Subur as agreed to be bank guarantor for the financial scheme of replanting. <p>Based on field visit and interview with smallholder representatives, each KUD's has been supported in IPM program. They equipped with beneficial plant and barn owl box (4 unit each plot). Certificate holder also conducted training in order to ensure the smallholder's competency. For example:</p> <ul style="list-style-type: none"> • OHS (Job Safety analysis), conducted on 25 May 2022, attended by 45 farmers. • First Aid Training, conducted on 25 May 2022, attended by 45 farmers. • Basic Fire, conducted on 31 March 2022, attended by 112 farmers. • HCV awareness, conducted on 4 May 2022, attended by 122 farmers. • Limited Pesticide Application (refresh), conducted on 4 May 2022, attended by 122 farmers. • Harvesting, Weed Control & IPM (refresh), conducted on 4 May 2022, by attended by 122 farmers. 	
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<p>Principle 6: respect workers' rights and conditions Protect workers' rights and ensure safe and decent working conditions.</p>
<p>Criteria 6.1: Any form of discrimination is prohibited.</p>

<p>6.1.1</p>	<p>(C) A publicity available non-discrimination and equal opportunity policy is implemented in such way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.</p>	<p>PT Inti Indosawit Subur – Buatan Group has established the Company Policy on Equal Opportunities as documented in “Kebijakan Perusahaan”, dated 1st December 2014: <i>“Memperlakukan seluruh karyawan secara adil, baik dalam hal penerimaan, penilaian kondisi dan lingkungan kerja, serta keterwakilan tanpa memandang suku, kasta, asal Negara, agama/kepercayaan, cacat, gender, orientasi seksual, keanggotaan serikat pekerja, afiliasi politik dan atau umur”</i>- to treat all member of cooperative in fair manner, and respect human rights, and representative without any discrimination on tribe, race, caste, country of origin, religion/belief, disability, gender, sexual orientation, union affiliation, political affiliation or age.</p> <p>The policy has communicated to all workers as recorded at “Daftar Hadir Sosialisasi Kebijakan Perusahaan”, on 16 March 2022 location in Buatan II POM was attended by 43 workers and on 13 February 2022 location in Simpang Perak Estate was attended by 64 workers</p> <p>Group Manager has established the ICS Policy under “Kebijakan Group Manager” dated 14th February 2020, that was signed by Manajer Group ICS Buatan, in point 9 was mentoned <i>“Menghormati HAM, serta keterwakilan tanpa memandang suku, kasta, asal negara, agama/kepercayaan, cacat, jender, orientasi seksual, keanggotaan serikat pekerja, afiliasi politik dan atau umur”</i>– to treat all member of cooperative in fair manner, and respect human rights, and representative without any discrimination on tribe, race, caste, country of origin, religion/belief, disability, gender, sexual orientation, union affiliation, political affiliation or age.</p> <p>The ICS policy has communicated to all workers as recorded at “Daftar Hadir Sosialisasi Kebijakan Group Manager”, on 13 March 2022 location in KUD Mulus Rahayu was attended by 32 stallholders’ members, on 16 March 2022 location in KUD Tani Rukun was attended by 42 smallholder</p>	<p>Complied</p>
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		<p>member and on 18 March 2022 location in KUD Mitra Usaha was attended by 47 smallholder members</p> <p>Promotion and upgrade are based on employee appraisal conducted annually as outlined in the Employee Assessment Form signed by the employee concerned, approved by the line manager and checked by the General Manager. The form indicates that there is no indication of employment discrimination in terms of ethnicity, caste, religion, disability, gender, sexual orientation, union membership, political affiliation and/or age,</p> <p><u>For example:</u> Worker’s promotion Simpang Perak Estate from temporary to permanent workers, based on Memorandum No. 061/HR-RO2/MEMO/SK/II/2021, dated 22 February 2022, on behalf of Mr. A*n*m as Harvester.</p> <p>Based on interviews with management, sample of smallholder member and document verification, that there is no discrimination against employees in the recruitment process and the promotion of positions or the appointment of employees as permanent employees.</p>	
6.1.2	<p>(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against. Evidence includes migrant workers non-payment of recruitment fees.</p>	<p>Based on interview during onsite audit year 2022 workers were aware if there any cases of discrimination, e.g., Document review of salary payment month April 2022 and May 2022, there was no evidence of discrimination.</p> <p>The workers and groups including local communities, women, and migrant workers have not been discriminated against</p>	Complied
6.1.3	<p>The unit of certification demonstrates that the recruitment selection, hiring access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p>	<p>PT Inti Indosawit Subur – Buatan II POM demonstrated the commitment that the recruitment selection, hiring access to training and promotion are based on skills, capabilities, qualities, and medical fitness. Such as:</p> <ul style="list-style-type: none"> • The company has prepared a procedure for hiring workers, regulated that hiring and promotion of workers based on skill, work experiences, and job evaluation. 	Complied

		<ul style="list-style-type: none"> • In the recruitment process, the company has set the standard of competence that inferred in the Position Description and Job Profile. Recruitment selection, hiring and promotion has based on skills, capabilities, qualities, and medical fitness. • Job opportunities were communicated and given to surrounding villagers at priority where no discrimination found observed during interview and related records of workers being employed. All workers have treated equally in accordance with company regulation including rights of worker as well. <p>All discrimination has prohibited for all area in estate and mill. PKB also mentioned ban of discrimination for all workers in the organization. Procedure for worker recruitment (SDM-A-001-00) and procedure for employee assessment (HRD C- 002-00) was available and mentioned there was no discrimination treatment during recruitment and promotion process. Promotion of worker will be done based on work period, annual evaluation result, and availability of position.</p> <p>Regular employee appraisals are carried out annually, which outlines the results of assessments on 10 categories such as Ability, Responsibility, Cooperation with others, hard worker, open, trustworthy/honest, discipline, timeliness in carrying out tasks, administration, and loyalty.</p> <p>Employment records are well maintained by the KTU, for example:</p> <ul style="list-style-type: none"> • Worker’s promotion Simpang Perak Estate from temporary to permanent workers, based on Memorandum No. 061/HR-RO2/MEMO/SK/II/2021, dated 22 February 2022, on behalf of Mr. A*n*m as Harvester. • Employee Promotion Application Letter from PKWT (temporary) to SKU-H (permanent) on 14 January 2022 as stated by Estate Manager letter No. 11/KBN/I/2022. The letter completed with the name of the employee proposed for appointment, Assessment Results of each employee, Statement letter of each employee, Types of training that 	
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		<p>have been attended by each employee, Job, and Responsibilities of each employee at the time of appointment.</p> <ul style="list-style-type: none"> • Perjanjian Kerja Harian Lepas – Daily worker agreement No. 104/PKHL/PBS/V/2022 on behalf of Mr Agus Piyono (mechanic in workshop) dated 27th May 2022. This Daily worker agreement has made duplicate. • Sample of letter of agreement “Surat Perjanjian Kerja”: <ul style="list-style-type: none"> - No: 02/SPK/KUD-BJ/2004, namely Ayu Novita Sari – location in KUD Tani Rukun - No: SK/KOP-KMR/I/2016, namely Mr Sunarmo – location in KUD Mulus Rahayu 	
6.1.4	<p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p>	<p>PT Inti Indosawit Subur – Buatan Group prohibits pregnant or breast-feeding women to perform chemical spraying. To mitigate, estate performed monthly pregnancy test.</p> <p>PT Inti Indosawit Subur – Buatan II POM has kept the record that spraying is not conducted by pregnant or breast-feeding women. The company has been conducting PP Test (pregnant test) every month.</p> <p>The last of pregnancy test conducted on 6 April 2022, 5 May 2022, and 6 June 2022. All the female sprayer in well condition and not being pregnant nor breast feeding. E.g.: Employee code: Mrs. H*I*m* and S*I**tr**</p> <p>Associated Smallholder Buatan (KKPA Delima Sakti) - KUD Mulus Rahayu, KUD Tani Rukun, KUD Mitra Usaha and KUD Makarti Sawit</p> <p>Pregnancy test conducted in monthly basis for 12 female pesticide operators. Documented evidence seen on 2 May 2022 and 6 June 2022 with result is no pregnant identified. Pregnancy test also perform to fertilizer applicator which dominated by female workers.</p>	Complied

<p>6.1.5</p>	<p>(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p>	<p>A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>PT Inti Indosawit Subur – Buatan II POM has implemented the policy related to protection reproductive right, such as not hiring female for work activity with high risk; monthly pregnancy test for sprayer and fertilizer applicator; 6-monthly check up for sprayer and fertilizer applicator.</p> <p>All female worker in sprayer team and fertilizer team shall join pregnancy test in company clinic, once a month.</p> <p>Regular gender committee meeting on 3-monthly basis with focus to communicating roles and responsibilities for gender committee, understanding the definition of sexual harassment in workplace. Communicating specific grievance mechanism to handle and resolve sexual harassment case.</p> <p>The program of Gender Committee of PT Inti Indosawit Subur – Buatan Group year 2022, these included:</p> <p>Special activities:</p> <ul style="list-style-type: none"> • Women-do clean Friday • <i>Posyandu</i> activities (integrated services post for toddlers) • Healthy activities for employees’ mothers • Socialization related to sexual harassment and violence against the women <p>Communication with the management related company employees’ complaints (especially female employees):</p> <ul style="list-style-type: none"> • Routine meetings at least 1 time a year • Socialization 	<p>Complied</p>
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		<p>The last of pregnancy test conducted on 6 April 2022, 5 May 2022, and 6 June 2022. All the female sprayer in well condition and not being pregnant nor breast feeding. E.g.: Employee code: Mrs. H*I*m* and S*I**tr**</p> <p>Group Manager has established the ICS Policy under "Kebijakan Group Manager" dated 14 February 2020, that was signed by Manajer Group ICS Buatan, in chapter 11 was stated "<i>Mencegah pelecehan seksual dan berbagai bentuk kekerasan terhadap perempuan serta melindungi hak-hak reproduksinya</i> (prevent sexual harassment and violence as well as protect reproductive rights for women)".</p> <p>The policy has communicated to all scheme smallholder's member and displayed in publication board in each KUD</p>	
6.1.6	There is evidence of equal pay for the same work scope.	<p>Buatan II POM, Simpang Perak Estate and Scheme Smallholder:</p> <p>Company has stated the wages for workers base on Decree of Keputusan Gubernur Riau No. Kpts. 1272/XI/2021", dated 20/11/2021 for Upah Minimum Kabupaten/Kota in Province of Riau on 2022 is IDR 3,030,598.54/month (Pelalawan Regency).</p> <p>The company composes the structure and scale of the 2022 wage period based on Permenaker No. 1 of 2017. This wage scale structure is a determination of the amount of wages for permanent workers (SKU-B) based on class, rank/position.</p> <p>The Company has already set wage standard based on wages set by the government recorded on Memorandum no. 048/HR-R02/MEMO/IV/2022, dated 30 April 2022; regarding: "<i>Upah Pekerja Golongan PHL, SKUH dan SKUB Tahun 2022</i>" and also the determination of the daily wage for BHL (Daily workers) and SKUH and SKUB employees (permanent workers). On this memorandum is also determine regarding structure of wage for each level worker (SKU-H and SKU-B). The company is also gives a scripts/slip salary to employees before salary is given, salary slip also contains basic salary, allowances, premium, labor health coverage (BPJS Ketenagakerjaan and Kesehatan) and deduction as well.</p>	Complied

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		<p>PT Inti Indosawit Subur – Buatan Group has also provided pay slip to employees before salary is given, salary slip also contains basic salary, allowances, premium, labor health coverage (BPJS Ketenagakerjaan and Kesehatan) and deduction as well.</p> <p>Taken sample of salary slip for period May 2022. Based on sample salary slip, confirmed that the company has paid wages employees salary according to the working days and it is applied in a fair to all employees.</p> <p>In detail about the components of wages given to workers, poured in employee salary slips/scripts provided every month before payday.</p> <p>Data verified, Payslip month May 2022, such as:</p> <p>Mr. Z*n*d*NN (BHL-Daily worker) – in Buatan II POM, working day: 18 days</p> <ul style="list-style-type: none"> • Basic salary IDR 3,030,598 • Process premium IDR - • Deductions: IDR 102,424 (including Payment of <i>BPJS Kesehatan and Ketenagakerjaan</i>) • Total take home pay: IDR 2,079,607 <p>Mr. P**n*M (BHL- Daily worker) – in Simpang Perak Estate, working day: 15 days</p> <ul style="list-style-type: none"> • Basic salary IDR 3,030,598 • Process Premium IDR - • Deductions: IDR 102,424; (including Payment of <i>BPJS Kesehatan and Ketenagakerjaan</i>) • Total take home pay: IDR 1,715,935 <p>Mr. Sri***o (SKUH-Fixed worker at ICS Officer), working day: 25 days</p> <ul style="list-style-type: none"> • Basic salary IDR 3,030,598 • Fringe Benefits IDR 579,200 	
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		<ul style="list-style-type: none"> • Premium IDR 400,000 • Deductions: IDR 120,677; (including Payment of <i>BPJS Kesehatan and Ketenagakerjaan</i>) • Total take home pay: IDR 3,907,374 	
<p>Criteria 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).</p>			
<p>6.2.1</p>	<p>(C) Documentation of pay and working conditions in accordance with applicable labour laws are available to the workers in national languages and explained to them in language they understand.</p>	<p>POM & Estate:</p> <p>The company have established work agreement for permanent employees through joint work agreement (PKB-Perjanjian Kerja Bersama) in term for 2 years. During the audit the PKB is for period of 2018 – 2020 and has done registered by Dirjen PHI/JSK the Ministry of Manpower on 4 July 2018. The renewal of PKB or working agreement for 2021 – 2023 are still under process of approval and registration to Ministry of Manpower. According the provisions in the PKB it is stated that if the new PKB is not yet available, the old PKB is still valid to be used as a reference.</p> <p>The company has set employment provisions in accordance with the rules and legal requirement. It is stated on employment contract off daily labour on article 1 about the types of work, working hours (maximum 40 hours per week and working from Monday to Saturday) and the wages has provides is based on waging regulation (Decree of Governor of Riau) in effect at January 2020. Statements about wages, stated in PKB in Article V concerning Wages-Upah; stated: "<i>Pekerja harian Tetap dan Pekerja Bulanan diberi upah berupa uang yang ditetapkan berdasarkan kesepakatan bersama dengan BKS-PPS dengan PD.FSP.PP-SPSi Propinsi yang bersangkutan sesuai dengan peraturan perundangan Otonomi Daerah yang berlaku, yaitu upah uang ditambah beras pekerja senilai/sejumlah 15 Kg (Upah BKS-PPS), dengan mengingat situasi ekonomi dan kemampuan perusahaan</i>".</p> <p>The Joint working Agreement (PKB 2018-2020 period) and the daily</p>	<p>Complied</p>

		<p>labour contract of the wage was presented in Bahasa Indonesia, so all employees can understand it and this PHL work agreement is handed over to the workers concerned after being described by the management (through KTU), so that employees who cannot read the writing can understand.</p> <p>Determination of wage for period 2020 is based on Decree of Gubernur Riau No. Kpts.1272/XI/2021", dated 20/11/2021 for Upah Minimum Kabupaten/Kota in Province of Riau is IDR 3,030,598.54/month (Pelalawan Regency).</p> <p>The Company has already set wage standard based on wages set by the government recorded on Memorandum no. 048/HR-R02/MEMO/IV/2022, dated 30 April 2022; regarding: "Kenaikan Upah Pekerja Golongan SKUB on Period 2022" and also the determination of the daily wage for BHL (Daily workers) and PKWT employees (certain time workers)</p> <p>Taken sample of salary slip for period May - June 2020. Based on sample salary slip, confirmed that the company has paid wages employee's salary according to the working days and it is applied in a fair to all employees.</p> <p>Taken sample of Payroll on May 2022 period:</p> <p>Simpang Perak Estate</p> <ul style="list-style-type: none"> - Receipt of sorting officer wages; on behalf of the R*n* Yul*a*d* as Upkeep Worker (manuring), working day 20, basic salary @ IDR 121,224/day IDR 2.424,479, premium IDR 5,000 sub total IDR 2,429,479, deduction; BPJS Ketenagakerjaan IDR 65,689, BPJS Kesehatan IDR 32,845, Cooperative IDR 465,000 sub total IDR 563,534, Net salary IDR 1,865,945. - Receipt of sorting officer wages; on behalf of the Alf*an*s G* * as harvester, working day 20, basic salary IDR 2.424,479, harvest premium IDR 1,541,440 subtotal IDR 3,965,919, deduction; BPJS Ketenagakerjaan IDR 60,399, BPJS Kesehatan IDR 30,024, sub total IDR 90,423, Net salary IDR 3,600,654. 	
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		<p>Buatan II POM</p> <ul style="list-style-type: none"> - Receipt of sorting officer wages; on behalf of the Ri* Mang*u*d* as sorting officer, working day 20, basic salary IDR 2.424,479, over time IDR 61,098 subtotal IDR 2,485,597, deduction; BPJS Ketenagakerjaan IDR 60,399, BPJS Kesehatan IDR 30,024, sub total IDR 90,423, Net salary IDR 2,395,174 - Receipt of sample boy wages; on behalf of the Ag*st*ar as sample boy, working day 19, basic salary IDR 2,303,255, over time IDR 1,387,803 subtotal IDR 3,691,077, deduction; BPJS Ketenagakerjaan IDR 60,399, BPJS Kesehatan IDR 30,024, sub total IDR 90,423, Net salary IDR 3,600,654 <p>Based on the sample pay slip above, that Simpang Perak Estate and Buatan II POM have applied the wages of their employees in line with Company has stated the wages for workers base on Decree of Gubernur Riau No. Kpts. 1272/XI/2021", dated 20/11/2021 for Upah Minimum Kabupaten/Kota in Province of Riau on 2022 and Law No. 13 of 2003 on Employment.</p> <p>Scheme Smallholder</p> <p>The application of employee harvest and fertilizer wages in Plasma Buatan I is based on Decree of Gubernur Riau No. Kpts. 1272/XI/2021", dated 20/11/2021 for Upah Minimum Kabupaten/Kota in Province of Riau is IDR 3,030,598.54/month (Pelalawan Regency) and also state on working agreement letter - "<i>Surat Perjanjian Kerjasama</i>", i.e: Working Agreement Letter on behalf of Mr. Sugito (as Harvester) at Jaya Makmur Cooperative dated 3 June 2022. Determining of wages, state on Article 2; Upah Atau Imbalan: The Wages/benefits is given monthly are calculated based on Rp/kg of FFB harvested per rotation, amounting to IDR 150-180 per kg of FFB, working for 5-6 hours per day (starting at 07.00 - 14.00).</p> <p>Meanwhile, for fertilizer sowing workers, the work agreement is stipulated</p>	
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		<p>at IDR 250 per Kg of fertilizer, except for Borate fertilizer at IDR 12,500 per sack. Whereas for fertilizer application, determine in a work agreement is IDR 250 per kg fertilizer except for Borate fertilizer IDR 12,500 per sack/bag.</p> <p>Payment of harvest wages is done hand over payment in the form of payment receipts from farmers (Farmer Groups) directly to the harvesters, sample taken:</p> <ul style="list-style-type: none"> • Harvesters on behalf of Sugito for the harvest on Junaidi field on period June 2022, for harvesting FFB: 3 rotation : 4100 kg FFB with wages of IDR 180 per kg, total wages of IDR 738,000 • Harvesters on behalf of Andri for the harvest on Sunardi field period May 2022, for harvesting FFB: 3 rotation : 3350 kg FFB with wages of IDR 170 per kg, total wages of IDR 569,500. 	
6.2.2	<p>(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed.</p>	<p>Buatan II POM and Simpang Perak Estate:</p> <p>The company have established work agreement for permanent employees through joint work agreement (PKB-Perjanjian Kerja Bersama) in term for 2 years. During the audit the PKB is for period of 2018 – 2020 and has done registered by Dirjen PHI/JSK the Ministry of Manpower on 4 July 2018. The renewal of PKB or working agreement for 2021 – 2023 are still under process of approval and registration to Ministry of Manpower. According the provisions in the PKB it is stated that if the new PKB is not yet available, the old PKB is still valid to be used as a reference.</p> <p>The company has set employment provisions in accordance with the rules and legal requirement. It is stated on employment contract off daily labour on article 1 about the types of work, working hours (maximum 40 hours per week and working from Monday to Saturday) and the wages has provides is based on waging regulation (Decree of Governor of Riau) in effect at January 2020. Statements about wages, stated in PKB in Article V concerning Wages-Upah; stated: "<i>Pekerja harian Tetap dan Pekerja Bulanan diberi upah berupa uang yang ditetapkan berdasarkan</i></p>	Complied

		<p><i>kesepakatan bersama dengan BKS-PPS dengan PD.FSP.PP-SPSi Propinsi yang bersangkutan sesuai dengan peraturan perundangan Otonomi Daerah yang berlaku, yaitu upah uang ditambah beras pekerja senilai/sejumlah 15 Kg (Upah BKS-PPS), dengan mengingat situasi ekonomi dan kemampuan perusahaan”.</i></p> <p>Determination of wages (including benefits and other benefit/ premium), working hours (including hours and overtime pay) and working days have been regulated in the PKB Period 2018-2020 in Article V; <i>Upah - Wages</i>, which explains:</p> <ul style="list-style-type: none"> a) Permanent workers are given wages, the value of which is determined by the employer on the condition that it is not lower than government regulations. b) Certain permanent workers are given wages (Basic Salary and Rice) in accordance with the status of the group/level whose value is determined by the employer with provisions not lower than government regulations c) Permanent workers receive additional wages (UMP/UMSK) and / or attendance incentives as stipulated further in separate provisions. <p>Rice allowance is: 9 kg and each anal (maximum 3 children) is given 7.5 kg per month, which consists of the basic salary and rice allowance. Rice supply is given once a month. Rice supply is intended to be of good quality and is considered appropriate for the health of the Worker and the gift is linked to attendance.</p> <p>Provisions on holidays and leave (both maternity leave and menstruation leave) have been regulated in Article VIII regarding Non-working Days; including: absenteeism, rest days of the week, official holidays, annual leave, maternity leave and others.</p> <p>The certification holder has made a salary slip for his employees, which is explained in detail, including: basic wages, fixed and premium (harvest and non-harvest) allowances, overtime pay, health and retirement</p>	
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		<p>benefits, and deductions that include contributions of labor security and health insurance.</p> <p>Based on the sample pay slip above, that Simpang Perak Estate and Buatan II POM have applied the wages of their employees in line with Company has stated the wages for workers base on Decree of Gubernur Riau No. Kpts. 1272/XI/2021", dated 20/11/2021 for Upah Minimum Kabupaten/Kota in Province of Riau on 2022 and Law No. 13 of 2003 on Employment.</p> <p>Scheme Smallholder</p> <p>The application of employee harvest and fertilizer wages in Plasma Buatan I is based on Decree of Gubernur Riau No. Kpts. 1272/XI/2021", dated 20/11/2021 for Upah Minimum Kabupaten/Kota in Province of Riau is IDR 3,030,598.54/month (Pelalawan Regency) and also state on working agreement letter - "<i>Surat Perjanjian Kerjasama</i>", i.e: Working Agreement Letter on behalf of Mr. Sugito (as Harvester) at Jaya Makmur Cooperative dated 3 June 2022. Determining of wages, state on Article 2; Upah Atau Imbalan: The Wages/benefits is given monthly are calculated based on Rp/kg of FFB harvested per rotation, amounting to IDR 150-180 per kg of FFB, working for 5-6 hours per day (starting at 07.00 - 14.00).</p> <p>Meanwhile, for fertilizer sowing workers, the work agreement is stipulated at IDR 250 per Kg of fertilizer, except for Borate fertilizer at IDR 12,500 per sack. Whereas for fertilizer application, determine in a work agreement is IDR 250 per kg fertilizer except for Borate fertilizer IDR 12,500 per sack/bag.</p> <p>Payment of harvest wages is done hand over payment in the form of payment receipts from farmers (Farmer Groups) directly to the harvesters, sample taken:</p> <ul style="list-style-type: none"> Harvesters on behalf of Sugito for the harvest on Junaidi field on period June 2022, for harvesting FFB: 3 rotation : 4100 kg FFB with wages of IDR 180 per kg, total wages of IDR 738,000 	
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		<ul style="list-style-type: none"> Harvesters on behalf of Andri for the harvest on Sunardi field period May 2022, for harvesting FFB: 3 rotation : 3350 kg FFB with wages of IDR 170 per kg, total wages of IDR 569,500. <p>Based on the sample pay slip above, that Buatan I Estate and Buatan I Mill have applied the wages of their employees in line with Law No. 13 of 2003 on Employment.</p>	
6.2.3	<p>(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, and other legal labour requirements.</p>	<p>Buatan II POM and Simpang Perak Estate:</p> <p>The company have established work agreement for permanent employees through joint work agreement (PKB-Perjanjian Kerja Bersama) in term for 2 years. During the audit the PKB is for period of 2018 – 2020 and has done registered by Dirjen PHI/JSK the Ministry of Manpower on 4 July 2018. The renewal of PKB or working agreement for 2021 – 2023 are still under process of approval and registration to Ministry of Manpower. According the provisions in the PKB it is stated that if the new PKB is not yet available, the old PKB is still valid to be used as a reference.</p> <p>The company has set employment provisions in accordance with the rules and legal requirement. It is stated on employment contract off daily labour on article 1 about the types of work, working hours (maximum 40 hours per week and working from Monday to Saturday) and the wages has provides is based on waging regulation (Decree of Governor of Riau) in effect at January 2020. Statements about wages, stated in PKB in Article V concerning Wages-Upah; stated: <i>"Pekerja harian Tetap dan Pekerja Bulanan diberi upah berupa uang yang ditetapkan berdasarkan kesepakatan bersama dengan BKS-PPS dengan PD.FSP.PP-SPSi Propinsi yang bersangkutan sesuai dengan peraturan perundangan Otonomi Daerah yang berlaku, yaitu upah uang ditambah beras pekerja senilai/sejumlah 15 Kg (Upah BKS-PPS), dengan mengingat situasi ekonomi dan kemampuan perusahaan"</i>.</p> <p>Determination of wages (including benefits and other benefit/premium), working hours (including hours and overtime pay) and working days have</p>	Complied

		<p>been regulated in the PKB Period 2018-2020 in Article V; <i>Upah - Wages</i>, which explains:</p> <ul style="list-style-type: none"> a) Permanent workers are given wages, the value of which is determined by the employer on the condition that it is not lower than government regulations. b) Certain permanent workers are given wages (Basic Salary and Rice) in accordance with the status of the group/level whose value is determined by the employer with provisions not lower than government regulations c) Permanent workers receive additional wages (UMP/UMSK) and / or attendance incentives as stipulated further in separate provisions. <p>Rice allowance is: 9 kg and each anal (maximum 3 children) is given 7.5 kg per month, which consists of the basic salary and rice allowance. Rice supply is given once a month. Rice supply is intended to be of good quality and is considered appropriate for the health of the Worker and the gift is linked to attendance.</p> <p>Provisions on holidays and leave (both maternity leave and menstruation leave) have been regulated in Article VIII regarding Non-working Days; including: absenteeism, rest days of the week, official holidays, annual leave, maternity leave and others.</p> <p>The certification holder has made a salary slip for his employees, which is explained in detail, including: basic wages, fixed and premium (harvest and non-harvest) allowances, overtime pay, health and retirement benefits, and deductions that include contributions of labor security and health insurance.</p> <p>Documents verified:</p> <ol style="list-style-type: none"> 1. Payslip of employee on May 2022 period (see 6.2.1) 2. Surat Perintah Lembur (SPL) – Over time order for example: 	
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		<ul style="list-style-type: none"> • SPL on 5 May 2022 on behalf of Agustiar (Buatan II POM) for process work in PBD for 6 hours. • SPL on 9 May 2022 on behalf of Rio Mangkudi (Buatan II POM) for process work in PBD for 5 hours. <p>3. Leave Application Letter on behalf of Armaina (Simpang Perak Estate), for annual leave taken on May 28–30, 2022 (within 3 days) of the right to leave for 12 days. (has been in accordance with applicable laws and regulations)</p> <p>Based on the sample pay slip above, that Simpang Perak Estate and Buatan II POM have applied the wages of their employees in line with Law No. 13 of 2003 on Employment.</p> <p>Scheme Smallholder</p> <p>The application of employee harvest and fertilizer wages in Plasma Buatan II is based on Decree of Gubernur Riau No. Kpts. 1272/XI/2021”, dated 20/11/2021 for Upah Minimum Kabupaten/Kota in Province of Riau is IDR 3,030,598.54/month (Pelalawan Regency) and also state on working agreement letter - “<i>Surat Perjanjian Kerjasama</i>”, i.e: Working Agreement Letter on behalf of Mr. Sugito (as Harvester) at Makarti Sawit Cooperative dated 3 June 2022. Determining of wages, state on Article 2; Upah Atau Imbalan: The Wages/benefits is given monthly are calculated based on Rp/kg of FFB harvested per rotation, amounting to IDR 150-180 per kg of FFB, working for 5-6 hours per day (starting at 07.00 - 14.00).</p> <p>Meanwhile, for fertilizer sowing workers, the work agreement is stipulated at IDR 250 per Kg of fertilizer, except for Borate fertilizer at IDR 12,500 per sack. Whereas for fertilizer application, determine in a work agreement is IDR 250 per kg fertilizer except for Borate fertilizer IDR 12,500 per sack/bag.</p> <p>Payment of harvest wages is done hand over payment in the form of payment receipts from farmers (Farmer Groups) directly to the harvesters, sample taken:</p>	
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		<ul style="list-style-type: none"> • Harvesters on behalf of Sugito for the harvest on Junaidi field on period June 2022, for harvesting FFB: 3 rotation : 4100 kg FFB with wages of IDR 180 per kg, total wages of IDR 738,000 • Harvesters on behalf of Andri for the harvest on Sunardi field period May 2022, for harvesting FFB: 3 rotations: 3.350 kg FFB with wages of IDR 170 per kg, total wages of IDR 569,500. <p>Based on the sample pay slip above, that Buatan I Estate and Buatan I Mill have applied the wages of their employees in line with Law No. 13 of 2003 on Employment.</p>	
6.2.4	<p>(C) The unit of certification provides adequate housing. Sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.</p>	<p>Buatan II POM and Simpang Perak Estate:</p> <p>Buatan II POM has prepared facilities for their workers, such as:</p> <ul style="list-style-type: none"> • Housing Mess (1 unit), type B (4 units), Type D (17 units), Type D1 (20 units), Type D2 (24 units), Type E (486 units), • Polyclinic (2 units), • Mosque (2 units), • Church (1 unit), • Community hall (1 unit), • Sport facilities, school bus (5 units), • Kindergartens (1 units), • Electricity, water supply, etc. <p>Simpang Perak Estate has prepared facilities for their workers, such as:</p> <ul style="list-style-type: none"> • Housing complex (399 units) • Elementary (1 unit) and kindergarden (1 units) • Polyclinic (1 unit) • Mosque (2 units) 	Complied

		<ul style="list-style-type: none"> • Church (1 unit) • School bus (2 units) • Ambulance (1 unit) • Sport facilities • Etc. <p>Company performed regular water quality test, whereby the source from worker housing's well.</p> <p>The Company also has a Budget for employee housing improvements every year, based on the 2022 employee home improvement budget. The budget has been distributed based on cash flow / detailing every month for a year, for example:</p> <table border="1" data-bbox="1093 778 1906 1129"> <thead> <tr> <th rowspan="2">Employee Housing</th> <th colspan="3">Housing Renovation Year 2022</th> </tr> <tr> <th>Plan (Unit)</th> <th>Realization (Unit)</th> <th>Cost (IDR)</th> </tr> </thead> <tbody> <tr> <td>Housing for Staff</td> <td>3</td> <td>3</td> <td>6,000,000</td> </tr> <tr> <td>Type B.1</td> <td>6</td> <td>4</td> <td>6,800,000</td> </tr> <tr> <td>Type B.2</td> <td>10</td> <td>9</td> <td>20,500,000</td> </tr> <tr> <td>Type B.3</td> <td>7</td> <td>2</td> <td>5,750,000</td> </tr> <tr> <td>Total</td> <td>26</td> <td>18</td> <td>39,050,000</td> </tr> </tbody> </table> <p>Scheme smallholders:</p> <p>All workers in Plasma has own house with water and electricity supplies from government (PLN). Based on interview with smallholder in KUD Kebun Sawit Harapan, KUD Bhirawa Bhakti, KUD Buatan Jaya and KUD Mulus Rahayu explained that the worker has their own house in the village.</p>	Employee Housing	Housing Renovation Year 2022			Plan (Unit)	Realization (Unit)	Cost (IDR)	Housing for Staff	3	3	6,000,000	Type B.1	6	4	6,800,000	Type B.2	10	9	20,500,000	Type B.3	7	2	5,750,000	Total	26	18	39,050,000	
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6.2.5	The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.	<p>Buatan II POM and Simpang Perak Estate:</p> <p>The company has minimarket which managed by the cooperative and traditional market is nearby surrounding company area, mostly goods needed by employees is provided by the minimarket. Price in minimarket was affordable and cheaper than traditional market nearby company area. Price control by cooperative and all member including workers and company management.</p> <p>Scheme smallholders:</p> <p>There is a market in the village which smallholder workers stay. Access road and the availability of foods and other basic needs was easy to found with competitive price/affordable. Price determined by the market and control by government.</p>	Complied
6.2.6	A DLW is paid to all workers in accordance with applicable regulations, including workers who work on a piece rate/quota basis, the calculation of which is based on a quota that can be achieved during regular working hours.	<p>Buatan II POM and Estate:</p> <p>Determination of wage for period 2020 is based on Decree of Gubernur Riau No. Kpts.1272/XI/2021", dated 20/11/2021 for Upah Minimum Kabupaten/Kota in Province of Riau is IDR 3,030,598.54/month (Pelalawan Regency).</p> <p>The Company has already set wage standard based on wages set by the government recorded on Memorandum no. 048/HR-R02/MEMO/IV/2022, dated 30 April 2022; regarding: "Kenaikan Upah Pekerja Golongan SKUB on Period 2022" and also the determination of the daily wage for BHL (Daily workers) and PKWT employees (certain time workers) see 6.2.1 above. The company is also gives a scripts/slip salary to employees before salary is given, salary slip also contains basic salary, allowances, premium, labor health coverage (BPJS Ketenagakerjaan and Kesehatan) and deduction.</p> <p>The company also made calculations related to DLW on period 2022, based on the wages given to employees as costs given by the company. Based on the verification the results of the DLW calculation in Y2022</p>	Complied

		<p>shows that total cost and kind benefit for average is IDR 536,512, average monthly take home salary per worker is IDR 2,587,593 and total value of prevailing wage is IDR 3,124,105.</p> <p>Scheme Smallholder:</p> <p>Calculation of DLW Cooperative employees period 2022, DLW Calculation of Family Workers (K-3) KUD</p> <p>Based on the verification of documents the results of the 2022 DLW calculation shows that the Gross of DLW is IDR 6,196,061.04.</p> <p>Piece rate/quotas calculation has been calculated based on the achievement of 7 working hours in accordance with applicable regulations (UU No. 11/2021), for example:</p> <p>Calculation of labor harvest in Plasma:</p> <ul style="list-style-type: none"> - Ability to harvest power for 7 hours per day: 3,000 kg - Harvest area: 4 hectares - Job performance in 1 hour 429 kg / hour - Basic wages Based on the provisions of Prov. Riau: IDR 120,800 per day - Price of harvest: IDR. 40 / kg - Price per hectare: IDR 30,200 per Ha - Actual Harvest Costs (currently in effect): IDR 200 / Kg - There is a gap of: 273% positive. <p>Calculation of fertilizer labor piece rate:</p> <ul style="list-style-type: none"> - The ability to sow fertilizer for 7: 600 kg - Tonnage per hour: 86 Kg / hour - Basic wages Based on the provisions of Prov. Riau: IDR 120,800 per day - Fertilizer wages: IDR 201 / Kg 	
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		<ul style="list-style-type: none"> - Actual fertilization wages (valid now): IDR 200 / kg - There is a gap of: 0.66% positive. 	
<p>PROCEDURAL NOTE:</p> <p>The RSPO has published guidelines on the calculation of Decent Living Wage (DLW) in June 2019. Since Indonesia does not have DLW benchmark yet, the RSPO Secretariat will conduct a DLW benchmark study in accordance with the Global Living Wage Coalition (GLWC) and Indonesian laws and regulations.</p> <p>In the meantime, until DLW benchmark for Indonesia is endorsed by the RSPO, the unit of certification carries out interim measures that was published by RSPO (dated 11 November 2019), including:</p> <ol style="list-style-type: none"> 1. Payment of minimum wages in accordance with applicable regulations 2. Assessment of wages paid (prevailing wages) and in-kind benefits. <p>Once the DLW benchmark is available, this procedural note is no longer applicable.</p>			
6.2.7	<p>Permanent fulltime employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal</p>	<p>Based on the verification of employee data for May 2022 period, PT IIS – Buatan II POM has permanent and non-permanent employees (SKU and PHL).</p> <p>The unit certification has identified those related to the main work in oil palm plantations based on the Circular Letter from GAPKI dated 8 February 2013 No. 073/GAPKI/II/2013 concerning the Circular on the Activity Flow of the Work Implementation Process in the Oil Palm Plantation Business Sector, stating that; only 2 (two) jobs that are the main activities in the Oil Palm Plantation industry, namely harvesting and processing products, the rest are supporting activities in accordance with <i>Permenakertrans No. 19/2012</i> which implementation can be left to other parties.</p> <p>The company has established a program for the appointment of PHL harvesters to Permanent workers (SKUH), as well as a program for the appointment/promotion of PHL harvest workers. This harvester employee appointment/promotion program has been submitted to the District Manpower and Transmigration Office of Pelalawan Regency:</p> <p><u>Simpang Perak Estate:</u></p>	Complied

		<p>Company has promoted the Appointment of PHL harvesters as follow:</p> <ul style="list-style-type: none"> - Period Jan – Dec 2021, based on Memorandum no. 845/ES-KSP/MEMO/10/2021 dated 1 October 2021, as many as 14 harvesters. - Semester I of 2022, 14 harvesters of PHL have been appointed as SKUH based on Memorandum No. 188/ES-KSP/MEMO/03/2022 dated 10 March 2022. - Promotion plan for the appointment of the next PHL harvesters per year as many as 22 harvesters. <p>Temporary workers shall be regulate to use not only for harvesting but will be used for another supporting jobs such as: upkeeping, pruning, EFB application). Estate manager and assistant monitor the temporary workers usage in accordance with labor regulation.</p> <p><u>Buatan II POM:</u></p> <p>Based on Employee Master per May 2022, Buatan II POM has had 109 employees consisting 93 SKU employees and 16 PHL employees. Buatan II POM has made a PHL employee appointment program that has been known by the District Manpower and Transmigration Office, Pelalawan Regency:</p> <p>The company has promoted the appointment of PHL workers, as follows:</p> <ul style="list-style-type: none"> - In 2021, 8 workers have been appointed PHL to become SKUH based on the Memorandum from Regional Head, Plt-2 No. 232/HR-RO2/MEMO/SK/10/2021 dated 19 October 2021. - Appointment program for PHL in Y2022 is 16 workers. Currently the temporary workers are not used as main work at mill. 	
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Criteria 6.3: The unit of certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.

<p>6.3.1</p>	<p>(C) A published statement recognizing freedom of association and right to collective bargaining in national languages is available and is explained to all workers in languages that they understand, and is demonstrably implemented.</p>	<p>Buatan II POM and Simpang Perak Estate:</p> <p>Freedom of association policy, dated 01 December 2019, written in Bahasa Indonesia, this policy was informed to all employees and being placed at public areas easily accessed. The freedom to gather and form associations is listed in the Company Policy in point 16: ... The company respects the rights of every employee to form or become a member of a trade union according to his wishes and to bargain collectively.”</p> <p>This policy is made in Indonesian, so that all workers can understand it. The socialization of this policy was carried out to all workers at PT IIS - Buatan II Group on 10-12 February 2022 which was attended by 29 workers and also on 23-24 March 2022 which was attended by 44 workers, attendance can be shown during the audit.</p> <p>PT Inti Indosawit Subur – Buatan Group has established a Labor Union and has been registered on Pelalawan Regency registered by Dirjen Pembinaan Hubungan Industrial dan Jaminan Sosial Tenaga Kerja No. Kep.88/PHIJSK-PKKAD/PKB/VI/2015, dated 18 June 2015.</p> <p>Scheme Smallholder:</p> <p>Manager of Kebun Plasma Buatan has established the ICS Policy under “Kebijakan Group Manager” dated 14 February 2020, that was signed by Manajer of Kebun Plasma Buatan, in point 9 was mentioned “<i>Menghormati HAM, serta keterwakilan tanpa memandang suku, kasta, asal negara, agama/kepercayaan, cacat, jender, orientasi seksual, keanggotaan serikat pekerja, afiliasi politik dan atau umur</i>” – to treat all member of cooperative in fair manner, and respect human rights, and representative without any discrimination on tribe, race, caste, country of origin, religion/belief, disability, gender, sexual orientation, union affiliation, political affiliation or age.</p> <p>This policy has been communicated to the members, latest training and socialization against the policy to all Smallholder and KUD employees performed on 11 February 2022 in KUD Makarti Sawit, 18 February 2022</p>	<p>Complied</p>
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		<p>in KUD Mitra Usaha, on 27 February 2022 in KUD Delima Sakti and on 13 February 2020 in KUD Bina Mulia. The evidence can be demonstrated during audit such as attendant list and photograph.</p> <p>The policy is also written in their farmer handbook "Buku Panduan Petani". The implementation of said policy in form of dissemination of anti-corruption policy, transparency in expenditure for road maintenance, fair calculation of worker payment, good quality FFB.</p>	
6.3.2	<p>Minutes of meetings between the unit of certification with trade unions or worker representatives who are freely elected, are documented in the national languages and available upon request.</p>	<p>Buatan II POM and Simpang Perak Estate:</p> <p>The union labor has 242 members consisting of employees of Buatan II POM and Simpang Perak Estate. Based on an interview with the chairman of the Pabrik Buatan II Mill (Mr. Siswanto) that in terms of establishing the organizational structure of the management of PT IIS - Made by the Group does not interfere and influence. Trade unions can freely recruit members and as a sign of membership, trade unions also provide membership cards.</p> <p>The Union Labor meeting with management on 2020 period, including:</p> <ol style="list-style-type: none"> 1. The meeting between SPSI and the Management of PT IIS on 27 January 2022, there were several discussions, related: delivery of production targets and the preparation of labor needed and socialization to employees regarding awareness of the use of PPE 2. Minutes of meeting on 9 February 2022 discuss related: <ul style="list-style-type: none"> • Payment of pruning wages • Providing work / harvest tools (fiber, harvesting cutter, etc.) • Wages and transport premiums are empty 3. Minutes of meeting on 23 February 2022, discuss related: delivery of productivities of harvester and mandatory for PPE wearing to all workers. 	Complied

6.3.3	Management does not interfere with the formation or operation of registered labour organizations/unions, or other freely elected representatives for all workers, including migrant and contract workers.	<p>Buatan II POM and Simpang Perak Estate:</p> <p>PT Inti Indosawit Subur – Buatan Group has company policy signed by Managing Director on 01/12/2014. The policy stated company guarantee freedom of association or be part of worker union as well as collective bargaining.</p> <p>The union labor has 242 members consisting of employees of Buatan II POM and Simpang Perak Estate. Based on an interview with the chairman of the Pabrik Buatan II Mill (Mr. Siswanto) that in terms of establishing the organizational structure of the management of PT IIS - Made by the Group does not interfere and influence. Trade unions can freely recruit members and as a sign of membership, trade unions also provide membership cards.</p>	Complied
Criteria 6.4: Children are not employed or exploited.			
6.4.1	A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.	<p>Buatan II POM and Simpang Perak Estate:</p> <p>PT Inti Indosawit Subur has established Company Policy dated 1 December 2019 that stated it is not allowed for any children to work in every activities/processes in company. This policy has been socialization to all worker and contractor on 17-21 February 2020. It stated on Company policy on point 14; "Prohibit children from working in any company activities".</p> <p>Certificate holders - PT IIS – Buatan Group, also put in place a policy related to the prohibition of child labor (under 18 years), on the document of the FFB Supplier Statement and Guarantee in point 12; "Do not employ children (under 18 years) which as prohibited by Law no. 13/2003.</p> <p>Data seen:</p> <ul style="list-style-type: none"> Employee register of Buatan II – Simpang Perak Estate, May 2022 period. There were 171 workers, the youngest worker namely Abdi Saptono date of birth 25 December 1991 and joint on 5 January 2011 (18 years and 9 months). 	Complied

		<ul style="list-style-type: none"> Employee register of Buatan II POM, December 2020 period. There were 97 workers in operation, the youngest worker namely Piter Silitonga date of birth 12 June 1999 and joint on 1 November 2017 (21 years and 5 months). <p>Scheme Smallholder:</p> <p>Plasma Buatan II have established policies related to the prohibition of employing children (under 18 years old). Samples taken for the KUD Bina Mulia, KUD Mutra Usaha and KUD Makarti Sawit Cooperative Policy dated 14 February 2020, explained in point 10; It is forbidden to employ children under the age of 18 in every plantation operational activity". This policy was disseminated to all members on 14 February 2022.</p> <p>Based on document review (list of employees) of KUD Mutra Usaha and KUD Bina Mulia, there were found that a minimum age are met (the youngest of harvester born year 1996 – based on ID verification).</p>	
6.4.2	<p>(C) Documented evidence on the fulfilment of worker’s minimum age requirements in accordance with applicable regulation and verification procedures for age requirements, are available.</p>	<p>Buatan II POM and Simpang Perak Estate:</p> <p>PT Inti Indosawit Subur has established Company Policy dated 1 December 2019 that stated there is not allowed all children to work in every activities/processes in company. This policy has been socialization to all worker and contractor on 17-21 February 2020. It stated on Company policy on point 14; "Prohibit children from working in any company activities".</p> <p>Certificate holders - PT IIS – Buatan Group, also put in place a policy related to the prohibition of child labor (under 18 years), on the document of the FFB Supplier Statement and Guarantee in point 12; "Do not employ children (under 18 years) which as prohibited by Law no. 13/2003.</p> <p>Data seen:</p> <ul style="list-style-type: none"> Employee register of Buatan II – Simpang Perak Estate, May 2022 period. There were 171 workers, the youngest worker namely Abdi Saptono date of birth 25 December 1991 and joint on 5 January 2011 	Complied

		<p>(18 years and 9 months).</p> <ul style="list-style-type: none"> Employee register of Buatan II POM, December 2020 period. There were 97 workers in operation, the youngest worker namely Piter Silitonga date of birth 12 June 1999 and joint on 1 November 2017 (21 years and 5 months). <p>Scheme Smallholder:</p> <p>Plasma Buatan II have established policies related to the prohibition of employing children (under 18 years old). Samples taken for the KUD Bina Mulia, KUD Mutra Usaha and KUD Makarti Sawit Cooperative Policy dated 14 February 2020, explained in point 10; It is forbidden to employ children under the age of 18 in every plantation operational activity". This policy was disseminated to all members on 14 February 2022.</p> <p>Based on document review (list of employees) of KUD Mutra Usaha and KUD Bina Mulia, there were found that a minimum age are met (the youngest of harvester born year 1996 – based on ID verification).</p>	
6.4.3	<p>(C) Young person maybe employed only for non-hazardous work with protective restrictions in place for that work.</p>	<p>Buatan II POM and Simpang Perak Estate:</p> <p>PT Inti Indosawit Subur has established Company Policy dated 1 December 2019 that stated there is not allowed all children to work in every activities/processes in company. This policy has been socialization to all worker and contractor on 17-21 February 2020. It stated on Company policy on point 14; "Prohibit children from working in any company activities".</p> <p>Document verification and interviews with several workers were carried out, that the workers who were relatively young were not employed directly related to hazardous work or were still being supervised by older and experienced workers. Protection of workers is always carried out by using PPE, especially in hazardous work in accordance with hazard identification.</p>	Complied

		<p>Certificate holders - PT IIS – Buatan Group, also put in place a policy related to the prohibition of child labor (under 18 years), on the document of the FFB Supplier Statement and Guarantee in point 12; "Do not employ children (under 18 years) which as prohibited by Law no. 13/2003.</p> <p>Data seen:</p> <ul style="list-style-type: none"> Employee register of Buatan II – Simpang Perak Estate, May 2022 period. There were 171 workers, the youngest worker namely Abdi Saptono date of birth 25 December 1991 and joint on 5 January 2011 (18 years and 9 months). Employee register of Buatan II POM, December 2020 period. There were 97 workers in operation, the youngest worker namely Piter Silitonga date of birth 12 June 1999 and joint on 1 November 2017 (21 years and 5 months). <p>Based on the sample above, verification is carried out with a photocopy of the ID card of each worker, it is proven that the age of the worker is appropriate and at work entry is at the age of > 18 years in accordance with the applicable laws and regulations.</p> <p>Scheme Smallholder:</p> <p>Plasma Buatan II have established policies related to the prohibition of employing children (under 18 years old). Samples taken for the KUD Bina Mulia, KUD Mutra Usaha and KUD Makarti Sawit Cooperative Policy dated 14 February 2020, explained in point 10; It is forbidden to employ children under the age of 18 in every plantation operational activity". This policy was disseminated to all members on 14 February 2022.</p> <p>Based on document review (list of employees) of KUD Mutra Usaha and KUD Bina Mulia, there were found that a minimum age are met (the youngest of harvester born year 1996 – based on ID verification).</p>	
6.4.4	The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and	Buatan II POM and Estate:	Complied

	<p>promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.</p>	<p>A formal policy for the protection of children, including prohibition of child labour and remediation are available in "Kebijakan Perusahaan" signed by Managing Director on 1st December 2019. In the policy stated that Company are prohibited to employ the child in the company operation. Child employee are under age 18th years old according to UU No. 13 Tahun 2003.</p> <p>The policy are included in the service contract and supplier agreement, sample seen:</p> <ul style="list-style-type: none"> - Agreement contract with CPO/PK transporter Pengangkutan Buana Jaya Bersama "Perjanjian Pengangkutan Nomor: 02/X/SKJ-ISJ/2021" dated 1st October 2021; Agreement with Jasa Bersama. On that contract is describes at Article 7 point e. "<i>Tidak mempekerjakan anak dibawah umur yang dilarang oleh peraturan perundangan ketenagakerjaan yang berlaku</i>" - Agreement contract with PT Buana Putra Jaya Lestari No. 01/SPJ/LEG-ISJ/III/21 dated 16 March 2021 – 30 March 2021, Scope of work: housing building. Annex 1 No. 7 "Menjamin bahwa tenaga kerja pihak ke dua bukan pekerja anak yang dilarang oleh Undang-undang ketenagakerjaan". - FFB supplier cooperation contract on behalf of CV Maju Bersama and also on behalf of Ilham and signed the TBS Supplier Statement and guarantee dated February 18, 2022, stated at point 12; does not employ minors (<18 years) as prohibited by law number 13 of 2003. 	
<p>Criteria 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.</p>			
<p>6.5.1</p>	<p>(C) A policy to prevent sexual and all other form of harassment and violence is documented, implemented and communicated to all levels of the workforce.</p>	<p>PT Inti Indosawit Subur – Buatan II Group has established a policy to prevent sexual and all other forms of harassment and violence as in "Kebijakan Perusahaan" that was signed by Managing Director dated 1st December 2019, in point 15; "To prevent any sexual or physical abuses happen to women as well as to protect their reproductive rights".</p>	<p>Complied</p>

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		<p>The policy has communicated to all workers as recorded at "Daftar Hadir Sosialisasi Kebijakan Perusahaan", on 16 March 2022 location in Buatan II POM was attended by 43 workers and on 13 February 2022 location in Simpang Perak Estate was attended by 64 workers</p> <p>Group Manager has established the ICS Policy under "Kebijakan Group Manager" dated 14th February 2020, that was signed by Manajer Group ICS Buatan, point 6 stated "<i>Mencegah pelecehan seksual dan berbagai bentuk kekerasan terhadap perempuan</i>" - Preventing sexual harassment and various forms of violence against women and protecting their reproduction rights"</p> <p>The ICS policy has communicated to all workers as recorded at "Daftar Hadir Sosialisasi Kebijakan Group Manager", on 13 March 2022 location in KUD Mulus Rahayu was attended by 32 smallholders' members, on 16 March 2022 location in KUD Tani Rukun was attended by 42 smallholder member and on 18 March 2022 location in KUD Mitra Usaha was attended by 47 smallholder members.</p>	
6.5.2	<p>(C) A policy to protect the reproductive rights of all, especially of women, is documented, implemented and communicated to all levels of the workforce.</p>	<p>PT Inti Indosawit Subur – Buatan II POM has established a policy, related to protect the reproductive rights "Kebijakan Perusahaan" that was signed by Managing Director dated 1st December 2019, in point 15; "To prevent any sexual or physical abuses happen to women as well as to protect their reproductive rights".</p> <p>The policy has communicated to all workers as recorded at "Daftar Hadir Sosialisasi Kebijakan Perusahaan", on 16 March 2022 location in Buatan II POM was attended by 43 workers and on 13 February 2022 location in Simpang Perak Estate was attended by 64 workers</p> <p>Based on the PKB: Collective Labor Agreement for the period 2021 - 2023, the company has granted rights to female workers related to the protection of their reproductive rights, in the PKB Article IV document; Working hours at point 6: Entrepreneurs are prohibited from associating</p>	Complied

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		<p>with pregnant women who according to doctors for the health and safety of their wombs and themselves, they work between 23.00 and 07.00".</p> <p>PT Inti Indosawit Subur – Buatan II POM has shown the document of Internal Memorandum No. 325/EST/MEMO/ 01/2020, dated 6th January 2020 from the Artificial Group Manager, related: "Policy regarding doctor's recommendation for female workers who are menstruating experiencing pain not to have to work on the first and second day of menstruation".</p> <p>PT Inti Indosawit Subur – Buatan Group prohibits pregnant or breast-feeding women to perform chemical spraying. To mitigate, estate performed monthly pregnancy test.</p> <p>PT Inti Indosawit Subur – Buatan II POM has kept the record that spraying is not conducted by pregnant or breast-feeding women. The company has been conducting PP Test (pregnant test) every month.</p> <p>The last of pregnancy test conducted on 6 April 2022, 5 May 2022, and 6 June 2022. All the female sprayer in well condition and not being pregnant nor breast feeding. E.g.: Employee code: Mrs. H* *m* and S* **tr**</p> <p>Group Manager has established the ICS Policy under "Kebijakan Group Manager" dated 14th February 2020, that was signed by Manajer Group ICS Buatan, that was signed by Manajer of Plasma Buatan, point 6 stated "<i>Mencegah pelecehan seksual dan berbagai bentuk kekerasan terhadap perempuan</i>"- Preventing sexual harassment and various forms of violence against women and protecting their reproduction rights and 12) Give leave rights for female workers who are pregnant.</p> <p>The ICS policy has communicated to all workers as recorded at "Daftar Hadir Sosialisasi Kebijakan Group Manager", on 13 March 2022 location in KUD Mulus Rahayu was attended by 32 smallholders' members, on 16 March 2022 location in KUD Tani Rukun was attended by 42 smallholder member and on 18 March 2022 location in KUD Mitra Usaha was attended by 47 smallholder members</p>	
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<p>6.5.3</p>	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified in accordance with applicable regulations in Indonesia.</p>	<p>For breastfeeding mothers and had children under 5 years, the company has provided child care (TPA) which is located in each division/Afdeling. In landfill space as well as the company provides a special space and time for 1 hour for breastfeeding mothers in need time to nursing his baby.</p> <p>The company has also identified the workers as young mothers and conducted consultations through distributing questionnaires on 15 June 2022 to as many as 12 young mothers in Buatan II POM and Simpang Perak Estate.</p> <p>From the results of the survey and consultation, management issued several policies, including:</p> <ul style="list-style-type: none"> - Policy for employees who are breastfeeding, based on the Memorandum from the Farm Manager No. 171/ES-IIS/MEMO/ 01/20 dated January 4, 2020, stated: the company guarantees female employees to breastfeed their children during working hours, by giving time and place to all female employees who have babies to breastfeed their children once for 45 minutes: morning at 10.00-10.45 WIB at the clinic or afdeling office or 11.30 - 12.15 WIB. - Periodic checkups at the clinic to monitor the health of the baby by providing POSYANDU services once a month at the Central TPA (Child Care Center) including immunization and vitamins. - The company has provided menstrual leave for female employee in accordance with the recommendation from paramedic in clinic, and this is in line with "Perjanjian Kerja Bersama" and applicable regulations. - The company has granted the right for maternity leave the women who gave birth in accordance with the applicable rules and "Perjanjian Kerja Bersama". - The company has consistently performed pregnancy tests to women workers who worked as a fertilizer and spraying every 1 month. 	<p>Complied</p>
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		<p>- The company has a policy of not hiring female labor during pregnancy or breast-feeding for the kind of work that endanger such as fertilizer or spraying by temporarily moving the work force to other types of work.</p> <p>Health needs for children/babies, the opportunity to be able to give breast milk to babies who are still breastfeeding, periodic immunizations and the need for care for children and babies in the plantation environment.</p>	
6.5.4	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, as long as the complaint is supported with adequate information, is documented, implemented and communicated to all levels of the workforce.</p>	<p>The company has had the procedure related to complain in document Standard Operating Procedure, No. SOP: XX-HR-308.5-RO; Revision: 0, December 11th 2009: Employees complaints: submission and settlement. Mechanism for complaints management where it needs to protect its confidentiality for complaint submitter was found in company policy's draft as in one of points of this policies stated that:</p> <p><i>"To provide appropriate information for those who inquiry it and to protect its confidentiality for whistle blower cases in accordance to law regarding environmental and social issue, food safety, health and safety work, so that it enables them to more participate to the decision making processes for improving company's performance".</i></p> <p>Policies that have been made by companies related to the protection of women's rights such as;</p> <ol style="list-style-type: none"> a. The company has provided menstrual leave for female employee in accordance with the recommendation from paramedic in clinic, and this is in line with "Perjanjian Kerja Bersama" and applicable regulations. b. The company has granted the right for maternity leave the women who gave birth in accordance with the applicable rules and "Perjanjian Kerja Bersama". c. The company has consistently performed pregnancy tests to women workers who worked as a fertilizer and spraying every 1 month. 	Complied

		<p>d. The company has a policy of not hiring female labor during pregnancy or breast-feeding for the kind of work that endanger such as fertilizer or spraying by temporarily moving the work force to other types of work.</p> <p>e. The company has consistently performed regular health checks for sprayers every six months.</p> <p>The company has conducted training and socialization prevention of sexual harassment in the workplace to the Committee members for example gender socialization on 23 March 2022, on "<i>Sosialisasi Pelecehan Seksual dan Kebijakan Hak Reproduksi</i>", was attended by 14 participants of Buatan II and Simpang Perak Estate.</p> <p>On 2022 Period, Gender Committee Work Program has been established including the issues that will be discussed at the meeting, including:</p> <ul style="list-style-type: none"> • Defending and guaranteeing the rights of women workers • Carry out routine immunization of children to mothers who have toddlers • Conduct family health education with environmental cleanliness <p>Realization of Gender committee program on 2022, such as:</p> <p>On February 23 March 2022; socialization to female workers related to the protection of women, children workers and sexual harassment at Simpang Perak Estate and Buatan II POM was attended by as many as 12 women workers. Socialization to female workers related to the sexual harassment policy on 21 January 2022 was attended by 25 participants.</p> <p>Based on the records of the routine meeting and interviews with management, that during the period 2021-2022 there were no cases related to women workers or the form of harassment to the women workers.</p>	
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Criteria 6.6: No forms of forced or trafficked labour are used.

<p>6.6.1</p>	<p>(C) All work is voluntary and the following are prohibited:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports; • Payment of recruitment fees; • Contract substitution without worker’s consent • Involuntary overtime; • Lack of freedom of workers to resign • Penalty for termination of employment, unless the unit of certification and the workers agree to the penalty and it is stated in the employment agreement • Debt bondage • Withholding of wages 	<p>Buatan II POM and Estate:</p> <p>Based on document list of employees verification, there was no indication of forced labor, contract substitution and/or human trafficking. All employees have had work agreement, regulating the rights and obligation of company and employee. The work agreement including working hour and salary payment.</p> <p>Based on the overtime warrant, it has been verified that there are no indications of an overtime order being forced, overtime is carried out on the approved order. There is no indication that there are workers who work due to debt bondage, nor are there any fees at the time of employee recruitment. All workers have been determined based on the agreed work contract, if there is a worker who will decide to stop working before the contract period ends, the company will conduct counseling / interview with the employee concerned and the decision taken is based on an agreement between the two parties.</p> <p>Based on document verification and salary payment, shows employee have paid in accordance to minimum wage regulation, as well as verification to the master list of employees May 2020 period, that there is no use of migrant/foreign/honorary worker.</p> <p>All employee including temporary workers have work agreement; regulating the scope of work, work agreement timeframe, working hour, salary payment, overtime and BPJS. Based on verification of master list of employees May 2020 period, there were no indication of contract substitution occurred. All employees have work agreement, explaining the rights and obligation including scope of work.</p> <p>Scheme Smallholders:</p> <p>Similar to estate and mill, there is no forced and trafficked labour has noted during assessment.</p>	<p>Complied</p>
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6.6.2	<p>(C) Where temporary (Specified Time Work Agreement/PKWT) or migrant workers are employed, a specific labour policy and procedures are established and evidence of implementation is available.</p>	<p>Buatan I POM, Estate and Scheme Smallholder:</p> <p>PT Inti Indosawit Subur – Buatan Group uses temporary workers as BHL in Simpang Perak Estate, Plasma and Buatan II Mill operations. Based on employee list period May 2020, there are 268 workers in Simpang Perak Estate, 3 workers in Plasma Buatan II and 19 workers in Buatan II Mill.</p> <p>The company has a procedure regarding SOP New Employee Reception No. AA-HR-305.2-R0 dated 1 February 2009, this procedure is a general acceptance of employees (for all employees), but there are no specific procedures and policies regarding BHL or PKWT workers according to the RSPO P&C requirements.</p> <p>PT Inti Indosawit Subur – Buatan II Group uses temporary workers as BHL in Simpang Perak Estate and Buatan II Mill operations. Based on employee list period May 2022, there are 411 workers in Simpang Perak Estate and 13 workers in Buatan II Mill.</p> <p>The company has a procedure regarding SOP New Employee Reception No. AA-HR-305.2-R0 dated 1 February 2009, this procedure is a general acceptance of employees (for all employees), but there are no specific procedures and policies regarding BHL or PKWT workers according to the RSPO P&C requirements.</p> <p>PT Inti Indosawit Subur – Buatan II POM and Simpang Perak Estate has issued the specific labour policy and procedures for temporary workers (PHL/PKWT); The policy and procedure are issued for each unit as Simpang Perak Estate and POM: Memorandum No. 94/ES-KSP/MEMO/08/2020, dated 10 August 2020.</p>	Complied

		<p>The policy and procedure has been communicated to workers, especially to temporary workers at Buatan II POM and Simpang Perak Estate on 11 August 2020. The procedure was explain the detail of mechanism for temporary workers recruitment, promotion of temporary workers to be permanent workers, term and condition and requirement of temporary workers in accordance with National regulation (UU No. 13 tahun 2003).</p>	
<p>Criteria 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.</p>			
<p>6.7.1</p>	<p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p>	<p>PT Inti Indosawit Subur – Buatan II POM has appointed a person who responsible on OHS implementation and monitoring. The safety committee has defined in all estate and POM under P2K3 (<i>Panitia Pembina Keselamatan dan Kesehatan Kerja</i>).</p> <p>Sample seen:</p> <ul style="list-style-type: none"> • Safety committee has defined under “Surat Keputusan Kepala Dinas Tenaga Kerja dan Transmigrasi Propinsi Riau nomor Kep.457/Disnakertrans-PK/SK-P2K3/XII/2021 tentang Pengesahan Panitia Pembina Keselamatan dan Kesehatan Kerja (P2K3) PT Inti Indosawit Subur – Pabrik Buatan, updated on 6 December 2021 • The company has also assigned the person who responsible on OHS expert (AK3- Umum), namely Mr S*n*e*** with license number: No.Reg 5/1595/AS.02.04/II/2021 dated 31 March 2022 valid until 3 years. • Record of monthly meeting (P2K3), sample seen: MoM on 17 May 2022, agenda meeting: review on previous OHS meeting, review of inspection of PPE usage, review on accidents report. • Three months report on OHS performance for period January to March 2022 was sent to Manpower Agency in Pelalawan Regency. <p><u>Scheme smallholders:</u></p>	<p>Complied</p>

		<p>Each KUD has established a team who has been responsible on implementation and implementation the OHS program. Based on interview during onsite audit, there was confirmed that smallholder's cooperative has established a team who has been responsible on implementation of OHS.</p>	
<p>6.7.2</p>	<p>Accident and emergency procedures in Indonesian language are in place and clearly understood by all workers. Assigned operatives trained in first aid are present in both field and other operations. First aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p>	<p>PT Inti Indosawit Subur – Buatan II POM has defined the procedure for emergency response under Standard Operational Procedure – Environmental Field Procedure, such as:</p> <ul style="list-style-type: none"> • Nomor AA-KL-11-EFP <i>tentang Penanganan Tumpahan di Laboratorium</i> • Nomor AA-KL-14-EFP <i>tentang Pengendalian Kebakaran Lahan</i> • Nomor AA-KL-16-EFP <i>tentang Pengendalian Tumpahan B3 dan Limbah B3</i> • Nomor AA-KL-17-EFP <i>tentang Pengendalian Ledakan Boiler, Tabung Gas dan Lainnya</i> • Nomor AA-KL-18-EFP <i>tentang Pengendalian Gempa Bumi, Banjir dan Tanah Longsor</i> • Nomor AA-KL-19-EFP <i>tentang Tanggap Darurat Kabut Asap</i> <p>PT Inti Indosawit Subur – Buatan II POM has also prepared the procedure on work accident under "Standard Operasioanl Prosedur – Investigasi Kecelakaan Kerja nomor AA-SMK3-18001.02-R0", revision 0 dated 1 April 2018.</p> <p>Data verified:</p> <ul style="list-style-type: none"> – The company has also appointed the person who has attended first aid training, namely Ms M*rs*n*i (license number on first aider 566/DTKT-WAS/LC/P3K/100 – Emergency response team has defined as in "Struktur Organisasi Tanggap Darurat" year 2022 	<p>Non-compliance</p>

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		<ul style="list-style-type: none"> - List of first aid kit (include portable first aid) as in "List Kebutuhan Obat-Obatan P3K updated in May 2022 • Regular emergency response drill conducted on 17 March 2022. The Fire Drill activity attended by 29 participants (workers and staff at Mill). The activity includes Fire Brigade Response, Evacuation to Assembly Point, First Aid Response and Victims Evacuation. Total duration of actual response during Fire Drill is 12 minutes. <p>Non Conformance: The organization have an emergency procedures but its implementation is inconsistent</p> <p>Objective Evidence During field visit there were found inconsistencies on implementation: The fire extinguisher at Gudang TUS and clinic are empty, and the seals are broken. Emergency Response Procedure was not clearly understood by assigned operators at PBD (Hydrant near Boiler Station).</p>	
6.7.3	<p>(C) Workers use appropriate personal protective equipment (PPE) which is provided free of charge to all workers in the workplace, to cover all potentially hazardous operations, such as pesticides application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p>	<p>PT Inti Indosawit Subur – Buatan II POM has demonstrated the record of realization the OHS program 2022 including use appropriate personal protective equipment (PPE) which is provided free of charge to all workers in the workplace, to cover all potentially hazardous operations, such as pesticides application, machine operations, land preparation, and harvesting, such as:</p> <ul style="list-style-type: none"> • Safety shoes was provided twice a year for all process operators including mechanic. Monitoring of PPE usage can be demonstrated on document "Monitoring Penggunaan APD" period January – June 2022 for each station. • Report of MCU for all workers in Buatan II mill, was conducted by "Klinik Asian Agri Sehat Buatan", dated 22 December 2021 was 	Complied

		<p>attended by 43 workers. The MCU was covered urine test, HSaAg and physical test.</p> <ul style="list-style-type: none"> • Monitoring of emergency response and preparedness facilities, i.e: fire hydrant (76 units) and fire extinguisher (11 units), updated in March 2021, location in Buatan II POM. • Regular emergency response drill conducted on 17 March 2022. The Fire Drill activity attended by 29 participants (workers and staff at Mill). The activity includes Fire Brigade Response, Evacuation to Assembly Point, First Aid Response and Victims Evacuation. Total duration of actual response during Fire Drill is 12 minutes. <p>PPE provision for all workers are demonstrated as per "Bukti Serah Terima Alat Pelindung Diri". Sample seen:</p> <ul style="list-style-type: none"> • PPE AP Shoes provision for fertilizer workers Simpang 13 May 2022 received by 24 workers (harvester) • PPE Hand Gloves provision for fertilizer workers on 13 May 2022 received by 14 workers (sprayers team) • Checklist of availability the first aid kit, dated 16 May 2022, the result shown OK. Location in Buatan II POM <p>Based on field visit on for spraying workers in Simpang Perak Estate and All KUD's sample the risk impact probability was irritate and eyes disease, control by using appropriate PPE (eye wear/safety glasses, masker and hand gloves) and regular training for sprayer workers.</p>	
6.7.4	<p>All workers are provided medical care and covered by accident insurance. Costs incurred from work related incidents, leading to injury or illness, are covered in accordance with applicable regulations or by the unit of certification if applicable regulations do not provide protection.</p>	<p>PT Inti Indosawit Subur – Buatan II POM has provided all normative rights for employee, such as salary as lined out in minimum wage for province level, leave entitlement, employees registered with social insurance for worker (BPJS), benefit for religious festival, provision of facilities (housing, electricity, clean water, medical clinic, school/school bus, worship house, personal protective equipment and working tools.</p>	Complied

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		<p>PT Inti Indosawit Subur – Buatan II POM has provided regular medical check-up for workers in high risk such as sprayer team, fertilizer applicator, workshop worker and mill operators.</p> <p>Data verified:</p> <ul style="list-style-type: none"> • Simpang Perak Estate: Record for payment of works insurance (BPJS Ketenagakerjaan). Billing statement dated 11 May 2022, amount IDR *1,133,356. status PAID. • Buatan II POM: Record for payment of works insurance (BPJS Ketenagakerjaan). Billing statement dated 11 May 2022, number of employee is 96 workers, amount IDR *4,155,727 status PAID. <p><u>Scheme smallholders:</u></p> <p>The government covers medical insurance for smallholders, and it is optional. Based on interview with smallholders at KUD Mulus Rahayu, KUD Tani Rukun, KUD Mitra Usaha and KUD Makarti Sawit most of farmers/smallholders has had insurance (BPJS Kesehatan Mandiri).</p> <p>Data verified:</p> <p>Evidence of payment period for BPJS TK and BPJS KS (medical insurance) month January 2021</p>	
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	<p>PT Inti Indosawit Subur – Buatan II POM has been kept the record of occupational injuries using LTA metrics under “Data Laporan Kecelakaan Kerja” year 2022.</p> <p>Data seen:</p> <ul style="list-style-type: none"> • The occupational injuries reported 12 cases. Lost time injuries is 13 man-days • All the accident has carried out the investigation. The followed up on recommendation on result of investigation available as evident. <p><u>Scheme Smallholders:</u></p>	Complied

		<p>The record of injuries has shown under document of "Monitoring Kecelakaan Kerja 2022", since 2022 there were no injuries cases (Nil) in KUD Mulus Rahayu, KUD Tani Rukun, KUD Mitra Usaha and KUD Makarti Sawit.</p>	
<p>Principle 7: Protect the environment, conserve biodiversity and ensure sustainable management of natural resources.</p>			
<p>Criteria 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.</p>			
<p>7.1.1</p>	<p>(C) IPM plans are implemented and monitored to ensure effective pest control.</p>	<p>Own Estates According to the Agricultural Policy Manual SOP AA-APM-OP-1100.10. R6 <i>Pengendalian Hama dan Penyakit</i> (Pests & Disease Control), certificate holder has plan to implement integrated pest management. According to the interview with pest control officer in Simpang Perak Estate obtain information that management has had a schedule to regularly monitored pest attack (census) as follows:</p> <ul style="list-style-type: none"> • Census of caterpillar/bag worm by monthly basis. • Census of <i>Ganoderma</i> annually. • Census rat infestation by recap the record of sortation in loading ramp. • Census of Barn Owl Box occupation in three monthly bases. <p>The last census in Simpang Perak Estate has been conducted in second week of March 2022. Result of census shows that pest attack still under control (below the economic threshold) which is limit 5%.</p> <p>Scheme Smallholder: According to document verification, pest monitoring and control sighted pest management plan to conduct caterpillar/bag worm census in by monthly and barn owl box monitored in three monthly bases. Census was conducted by field supervisor that help by person that assign by board of KUD.</p>	<p>Complied</p>

		During the field visit in own estate (Simpang Perak Estate Block A15k Afd I) visually there was no issues related to the outbreak or infestation. However, there were a usage of natural predator (<i>Tyto alba</i>) to reduce a rat infestation. Due to weather condition (heavy rain), there is no field visit to smallholder plot. However, there is no report of outbreak in their plot so far.	
7.1.2	Invasive species are not to be used according to applicable regulation in managed areas, unless plans to prevent and monitor their spread are implemented.	The company only uses natural predators namely <i>Tyto alba</i> and <i>Sycanus dichotomus</i> in pest control efforts. Both predators are not recorded in invasive species according to the information listed on the website www.cabi.org on in global invasive species database http://www.iucngisd.org/gisd/search.php .	Complied
7.1.3	There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities.	Based on document verification, interview with management and stakeholders and field observation obtained information that there is no record use of fire for pest control.	Complied
Criteria 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.			
7.2.1	(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.	Based on the document verification and interview with management, obtain information that there is only pesticide usage for chemical weeding and pest control (if needed). Recommendation of pesticide used are refer to SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i> (weed control) where explain the weeds type, weeding control methods and eradication, pesticide characteristic, and procedures of application (spraying volume, calibration, chemical weeding interval, target and sprayer maintenance). During the audit, found some pesticide list that usually used with active ingredients such as <i>isopropyl amine glyphosate</i> , <i>fluoroksifir</i> , <i>methyl metsulfuron</i> , <i>triklofir</i> , <i>diuron</i> , <i>diuron</i> , <i>lamda sihalotrin</i> and <i>2,4-D dimetil amina</i> , <i>bacillus thuringiensis berliner</i> , <i>ammonium glufosinat</i> , <i>acephate</i> , <i>copper oxide</i> and <i>mancozeb</i> . Certificate holder no longer using paraquat since 15 November 2019, according to the circular letter of Deputy	Complied

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Managing Director No. 008/DMD/MEMO/OCT/19 dated 22 October 2019.
 According to the national regulation, all pesticide used by the management unit has registered in agricultural ministry of Indonesia. It can be check in http://pestisida.id/simpes_app/index.php.

Agrochemical	Active ingredients	Register No.	Target
Kenlon 480 EC	Trikolpir Bitoksi Etil Ester 480 g/l	RI.01030120062433 Valid until 31 Dec 2021	Wood
Elang 480 SL	Isopropil Amina Glifosat 480 g/l	RI.01030119941170 Valid until 21 Dec 2021	Narrow leaf weed, <i>Asystasia</i> , <i>Imperata cylindrical</i>
Kenrane 288 EC	Floroksipir 1-MHE: 288 g/l	RI.01010120103759 Valid until 20 Dec 2020	<i>Legume, Asystasia</i>
Basta 150 SL	Amonium Glufosinat 150 g/l	RI.01030119921113 Valid until 22 Jan 2024	Wide leaf (<i>Ageratum conyzoides</i>); narrow leaf (<i>Axonophus compressus</i> , <i>Imperata cylindrical</i> , <i>Ischaemum timorense</i> , <i>Ottochloa nodosa</i> , <i>Setaria palmifolia</i>).
Karmex 80 WP	Diuron 80%	RI.01030120113958	broadleaf weeds (<i>Borreria latifolia</i> , <i>Asystasia intrusa</i> , <i>Clidemia hirta</i> , <i>Mikania micrantha</i>) and narrow leaf weeds (<i>Imperata cylindrical</i> , <i>Cyperus rotundus</i> , <i>Cyclosorus aridus</i>)
Metaprima	Metil melsulfuron	RI.01030120031897	Broadleaf weeds, <i>Ageratum conyzoides</i> , <i>Calopogonium</i>

		Valid until 03 September 2023	mucuniodes, Clidemia hirta, Synedrella nodiflora.		
		Rolidor 25EC	Lamda sihalotrin RI.01010120031921 Valid until 03 September 2023	Spodoptera litura	
		Nordox 86WG	Copper oxide RI. 01020119951188 Valid until 11 May 2021	Leaf disease	
		Gulmaron 80WP	Diuron 80% RI. 01030119981413 Valid until 2 May 2022	Broadleaf weeds, Synedrella nodiflora, Eleusine indica	
		<p>Smallholder</p> <p>During the audit, sighted the list of pesticide recommendation (by active ingredients) that can used by smallholder such as isopropyl amine glyphosate, fluoroksifir, methyl metsulfuron and triklofir. During January 2021 – April 2022, the smallholders used pesticide with active ingredients isopropyl amine glyphosate, fluoroksifir and methyl metsulfuron.</p>			
7.2.2	<p>(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per Ha and number of applications) are provided.</p>	<p>Certificate holder has showed the record of LD50 calculation in each unit based on amount of pesticide used. For example, Kebun Luar Buatan has calculated the LD50 based on amount of active ingredients applied per Ha and number of applications. Through the calculation of pesticide usage during January – December 2021 known that LD50 of isopropyl amina glifosat was 0.2841 mg/Ha.</p>			Complied
7.2.3	<p>(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p>	<p>Until this recertification audit obtain information that there is no pesticide use for control pest attack. All of pesticide only using for weeding (herbicide).</p> <p>Based on interview with IPM supervisor and smallholder representatives known that no outbreak that causes pesticide usage.</p>			Complied

7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in Indonesia best practice guidelines.</p>	<p>There was some pesticide usage especially in nursery and immature area to prevent pest infestation. For example, there was a record of pesticide (active ingredients Lamda sihalotrin) to prevent <i>Spodoptera litura</i> infestation. This prophylactic usage has followed the national guidelines such as dosage, interval and infestation rate. Also, in accordance to Asian Agri's Research and Development guidelines.</p>	Complied
7.2.5	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat, are not to be used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to: 7.2.5a Judgment of the threat and verify why this is a major threat.</p>	<p>Based on the document verification and interview with management, obtain information that there is only pesticide usage for chemical weeding and pest control (if needed). Recommendation of pesticide used are refer to SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i> (Weed control) where explain the weeds type, weeding control methods and eradication, pesticide characteristic, and procedures of application (spraying volume, calibration, chemical weeding interval, target and sprayer maintenance).</p> <p>According to bin card in chemical store obtained information of pesticide list that usually used with active ingredients such as <i>isopropyl amine glyphosate, fluoroksifir, methyl metsulfuron, triklofir, diuron, paraquat diklorida, diuron, and lamda sihalotrin</i>. Certificate holder no longer using paraquat since 15 November 2019, according to the circular letter of Deputy Managing Director No. 008/DMD/MEMO/OCT/19 dated 22 October 2019.</p> <p>To reduce the human and environmental risk, there is some continuous action that has been implemented as follows:</p> <ul style="list-style-type: none"> • Set up the pesticide rotation. For example, chemical weeding rotation is 4 times a year where the rotation in immature and early mature more often than mature and old palm. • Using the ultralow volume nozzle to minimize water consumption and reduce the risk for environment. During the field visit to the pesticide store sighted the micron herby system knapsack as example. 	Complied

		<ul style="list-style-type: none"> • Conducted regularly training for pesticide applicator and equipped them with appropriate PPE's. • Delaying the pesticide if weed or pest is under control. According to the interview with estate manager obtain information that the pesticide rotation can be delayed or reduced especially in mature or old palm where weeds/pest population are under control. • Minimalize contamination for pesticide applicator and their families by ensuring them to clean themselves before back home. 	
	7.2.5b Why there is no other alternative which can be used.	<p>According to IPM procedures, certificate holder always using biological approach in order to monitoring pest attack. For example, estate using <i>Tyto alba</i> to monitor rat infestation than using rodenticide.</p> <p>To maintain ground condition especially weeding control, certificate holder has had a procedures SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i> (Weed Control). This procedure has set the specific pesticide in with minimum risk in accordance with the target.</p>	
	7.2.5c Which process was applied to verify why there is no other less hazardous alternative.	<p>Certificate holder through Asian Agri's Research and Development Department has examined some pesticide in specific target. The result of examination and pesticide recommendation written in the SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i> (Weed Control).</p>	
	7.2.5d Process to limit the negative impacts of the application.	<p>SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i> (Weed Control) has set some procedures to reduce negative impact of the application as follows:</p> <ul style="list-style-type: none"> • Pesticide/herbicide selection to ensuring the application is effective. • Set up the appropriate nozzle in chemical weeding activity based on weed type, topography and availability of water. 	

		<ul style="list-style-type: none"> • Regularly spraying calibration to ensuring the application is effective and efficient. • Calculate pesticide/herbicide usage based on target (hectarage and weed type). • Spraying technic. 	
	<p>7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</p>	<p>Certificate holder did not use pesticide to eradicated pest without the outbreak. If any census result shows the pest attack almost reach the economical threshold, they usually conducted campaign test using pesticide if needed.</p> <p>Chemical weeding activity has regularly set by management. For example, normally circle, path and collecting point weeding conducted 4 times a year in immature and mature area. Those application can be reduced in line with the palm ages.</p>	
<p>7.2.6</p>	<p>(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they conduct.</p>	<p>PT Inti Indosawit Subur – Buatan Group has assigned chemical weeding team (<i>Tim Unit Semprot/TUS</i>) in each estate/unit to handling chemical weeding activity. The team member originated from own workers (for own estate) and local communities (for smallholder). They regularly attended training on pesticide handling that conducted by the pesticide supplier in collaboration with local pesticide committee.</p> <p>Based on document review and interview with random pesticide applicator known that they attended the last training on pesticide handling in March 2022. Some topic that discuss such as safety pesticide handling, national regulation related to pesticide, symbol and label awareness and emergency procedure if any contamination or poisonous. The worker can describe purpose of PPE usage, attending regularly medical check and safety working procedures.</p> <p>Workers that perform herbicide spraying in Simpang Perak Estate also perform spraying activity in smallholder plantation. Spraying team has been trained with pesticide handling training, agrochemical application</p>	<p>Complied</p>

		<p>training and limited pesticide training. Spraying team only handles herbicide to control the weed. Sprayers understood the type of chemical for each weed type, the hazard, the application and appropriate PPE use. During onsite audit year 2022, auditor team has also interviewed sample of smallholder representatives in KUD Mulus Rahayu, KUD Mitra Usaha, KUD Tani Rukun, and KUD Makarti Sawit, and obtain information that the company has provide training session for them on how to be handling pesticide safely. For example, pesticide applicator shall use appropriate PPE during application, no smoke, avoid the direction of wind blows and cleaned their body after application to reduce contamination.</p>	
7.2.7	<p>(C) Storage of all pesticides in accordance with recognized best practices.</p>	<p>Location the pesticides storage in Buatan II POM.</p> <p>Pesticides are always applied in accordance with the product label and storage instruction. Agrochemicals storage was locked in areas with limited access. The storage was ventilated. MSDS and hazard symbol label were provided nearby of agrochemicals. Emergency shower and eyewash were also provided to anticipate in case of an emergency of agrochemical handling. The possible spillage was managed. Secondary containment was provided around the chemical storage area. Spill kit was also provided in the area. Interview with spraying workers demonstrated that all of them have a good knowledge regarding pesticide usage and its material usage and toxicity. PPE for handling of chemicals were provided including boots, apron, safety glass, respiratory mask and hand gloves. PPE used was appropriate according to recommendations in any risk assessments. PPE provided and used can be easily replaced if damaged. All precautions attached to the products properly observed, applied, and understood by workers.</p> <p>Based on a field visit to the Pesticides Storage dated 26 March 2021, there was found that:</p> <ul style="list-style-type: none"> - Permanent Buildings, - A good ventilation, 	Complied

		<ul style="list-style-type: none"> - Permanent floor is cemented, the floor of the mixing of pesticides using ceramics, and equipped with a "spillage trap", - Eye wash shower, first aid box, PPE and Fire extinguisher are provided. - PPE room - Operation control: MSDS are available for all types of existing pesticides and the pesticide management and safety instructions are available - A package management/ used pesticide package is available - Water wash of pesticides containers collected in "spillage trap" - The flow of waste water is channeled and stored so that it is not discharged into the environment. The water used is used for its dilution. <p>All waste products has been identified and documented under the "Evaluasi Aspek-Dampak Lingkungan" (Environmental Aspect impacts) year 2021". Domestic waste is the main concern to be manage.</p> <p>Both Mill and Estate, has periodically schedule to manage the domestic waste.</p> <p><u>Scheme smallholders:</u></p> <p>Group manager Smallholder Buatan has a policy and mechanism to manage the waste from ex fertilizer sack according to procedure of "Pengelolaan Kemasan Ex (Bekas) Pupuk di Kebun No. 035/DOK/SOP/PT.IIS KLB-AA/2016" dated 2 December 2016. The ex fertilizer sack must be handled by triple rinse and use as loose fruit sack, the inner bag of fertilizer was delivered to collector.</p> <p>During field visit and interview with sample smallholder in KUD Mulus Rahayu, KUD Tani Rukun, KUD Mitra Usaha and KUD Makarti Sawit, they were well aware of the to manage the waste from ex fertilizer sack and empty chemical.</p>	
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7.2.8	All pesticide containers that are disposed of and/or used for other purposes are managed according to applicable regulations and/or instructions on the packaging.	<p>All chemicals and empty containers collected and stored at permitted hazardous waste storage (Tempat Penyimpanan Sementara Limbah B3) location in Ukui Estate.</p> <p><u>Scheme smallholders:</u></p> <p>Group manager has a policy and mechanism to manage the waste from ex fertilizer sack according to procedure of "Prosedur Pemusnahan Wadah Bekas Bahan Kimia dan Diagram Alur Pembuangan Wadah Bekas Agrokimia". The ex fertilizer sack must be handled by triple rinse and use as loosefruit sack, the innerbag of fertilizer was delivered to collector.</p> <p>During field visit and interview with sample smallholder in KUD Sumber Makmur dated 29th March 2021, they were well aware of the to manage the waste from ex fertilizer sack and empty chemical.</p> <p>All pesticides container is sent to the registered collector/transporter which approved by Environmental Ministry, namely PT Hazmat Techno Indonesia as mentioned in the indicator 7.3.2.</p> <p>The verified manifest document are as follows:</p> <ul style="list-style-type: none"> • Manifest number: KLHK-1634781063, dated 20 September 2021 for used battery (0.072MT), transported PT Hazmat Techno Indonesia, vehicle BK 9133BR. • Manifest number: KLHK-1634781314, dated 20 September 2021 for empty chemical container (0.275MT), transported PT Hazmat Techno Indonesia, vehicle BK 9133BR. • Manifest number: KLHK-1634781035, dated 20 September 2021 for oil used (1,147MT), transported PT Hazmat Techno Indonesia, vehicle BK 9133BR. 	Complied
7.2.9	(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information	Until this audit – 2022, there is no aerial application of pesticide throughout the company plantation and scheme smallholders	Complied

	is provided to affected local communities at least 48 hours prior to application of aerial spraying.		
7.2.10	(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.	<p>Annual medical check-up was conducted for all workers handling with chemical, such as pesticide, herbicide and fertilizer.</p> <p>The latest medical check-up performed on 30 March 2022 at company medical healthcare “Klinik Asian Ari Sehat Buatan” in collaboration with FOCUS Clinical Laboratory Pekanbaru and attended by 110 workers, consisted of fertilizer applicators, spraying applicator and PIC in pesticides storage.</p> <p>The result of MCU has communicated to all workers on 16 and 17 May 2022.</p> <p><u>Scheme smallholders:</u></p> <p>Medical check-up for smallholder’s pesticide operator is include with Estate, because those chemical/spraying operators are work at Estate and Smallholders area. Sample: in KUD Mulus Rahayu, KUD Tani Rukun, KUD Mitra Usaha and KUD Makarti Sawit.</p>	Complied
7.2.11	(C) No pesticide-related work is carried out by pregnant or breastfeeding women, or people with medical limitations and they are offered other equivalent work alternatives.	<p>PT Inti Indosawit Subur – Buatan Group prohibits pregnant or breast-feeding women to perform chemical spraying. In order to mitigate, estate performed monthly pregnancy test.</p> <p>PT Inti Indosawit Subur – Buatan II POM has kept the record that spraying is not conducted by pregnant or breast-feeding women. The company has been conducting PP Test (pregnant test) every month.</p> <p>The last of pregnancy test conducted on 6 April 2022, 5 May 2022, and 6 June 2022. All the female sprayer in well condition and not being pregnant nor breast feeding.</p>	Complied
Note For 7.2.11			

Referring to Act No. 13 of 2003 concerning Manpower, Act No. 35 of 2014 concerning Child Protection, and taking into account the risks of hazards on palm oil plantations and mills on the development and physical, mental and social health of children, the national interpretation mandates that the unit of certifications does not employ people under the age of 18 for pesticide spraying. For this reason, the provisions of young workers under 18 years in indicator 7.2.11 are irrelevant.

Criteria 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.

7.3.1	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented in accordance with applicable laws and regulations.	<p>PT Inti Indosawit Subur – Buatan II POM and Estate collects all hazardous waste from estates and mill into temporary hazardous waste storage in central workshop compound.</p> <p>PT Inti Indosawit Subur – Buatan II POM has prepared a procedure to handle hazardous waste titled "Prosedur Penanganan Limbah B3" No.AA-KL-06-EFP explains methods to collecting the waste, recording in balance and disposal through licensed third party transporter</p> <p>PT Inti Indosawit Subur – Buatan II POM has stored the hazardous waste in temporary storage with permit. The temporary hazardous waste storage has a valid permit based on "Surat Keputusan Badan Penanaman Modal dan Pelayanan Perijinan Terpadu nomor: KPTS.503/BPMP2T-PLY/14/2016, dated 18 March 2016, The hazardous waste is sent to the registered collector/transporter which approved by Environmental Ministry, namely PT Hazmat Techno Indonesia,</p> <p>A documented waste management plan to avoid or reduce pollution and its implementation shall available under document of Environmental Aspect-Impacts (Evaluasi Aspek-Dampak Lingkungan) year 2022. The document covered all operation in mill, estate, and its smallholders.</p>	Complied
7.3.2	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.	PT Inti Indosawit Subur has a waste management plan, identifying type and source of waste and the disposal plan. PT Inti Indosawit Subur prepared a procedure to handle hazardous waste titled "Prosedur Penanganan Limbah B3" No.AA-KL-06-EFP explains methods to collecting the waste, recording in balance and disposal through licensed third party transporter.	Complied

		<p>The company store hazardous waste in temporary storage with permit, The hazardous waste is sent to the registered collector/transporter which approved by Environmental Ministry, namely PT Hazmat Techno Indonesia,</p> <p>Based on interview with workers who are handling of pesticides that they understood of disposed empty containers pesticides, such as: Empty chemical containers re-used only for mixing purposes, unusable are triple rinsed, punctured and disposed to the approval collector.</p> <p>Data verified – during ASA 2.1-year 2022:</p> <ul style="list-style-type: none"> • Manifest number: KLHK-1634781063, dated 20 September 2021 for used battery (0.072MT), transported PT Hazmat Techno Indonesia, vehicle BK 9133BR. • Manifest number: KLHK-1634781314, dated 20 September 2021 for empty chemical container (0.275MT), transported PT Hazmat Techno Indonesia, vehicle BK 9133BR. • Manifest number: KLHK-1634781035, dated 20 September 2021 for oil used (1,147MT), transported PT Hazmat Techno Indonesia, vehicle BK 9133BR. 	
7.3.3	The unit of certification does not use open fire for waste disposal.	<p>All waste products have been identified and documented under the “Evaluasi Aspek- Dampak Lingkungan” (Environmental Aspect impacts). Domestic waste is the main concern to be manage. Both Mill and Estate, has periodically schedule to manage the domestic waste.</p> <p>The document of “Jadwal Pengangkutan Sampah 2022 nuntuk Karyawan Buatan Estate, update 15 Jan 2022”. Regulation of domestic waste management refer to “UU No. 18 Tahun 2008 tentang Pengelolaan Sampah”.</p> <p>ICS Group Plasma Buatan has defined the procedure “Pengelolaan Kemasan Ex (Bekas) Pupuk di Kebun” No. 035/DOK/SOP/PT.IIS KLB-AA/2016 dated 2 December 2016. All ex-fertilizer sack was prohibit to</p>	Complied

		dispose in plantation and housing area. All the ex-fertilizer sack usage must be identified and reported to Group Manager ICS.	
Criteria 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	Good agricultural practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts is documented.	<p>Own Estates</p> <p>Both own estate and smallholder has had the procedure related to manage soil fertility (see detail in indicator 3.3.1). The implementation of manuring is based on fertilizer recommendation that set by Asian Agri's Research and Development Department. Fertilizer dosage has set according to the soil needed refer to SSU/LSU.</p> <p>Scheme Smallholder:</p> <p>Based on interview with plasma manager obtain information that the fertilizer recommendation set by Asian Agri's Research and Development Department. No fertilizer applied in riparian area to minimize environmental impact.</p>	Complied
7.4.2	Analysis of tissue samples (e.g. leaves) and soil on a regular basis to monitor and manage changes in soil fertility and plant health is documented.	<p>According to the Asian Agri's agricultural policy, soil sampling conducted every 6 years while leaf sampling conducted annually. Soil sampling refers to R&D AA IK Profil Tanah Rev.00 "Instruksi Kerja Pengambilan Sampel Tanah Asian Agri Group" dated 09/01/2016, the Work Instruction has explained that the soil sampling is conducted every 6 years and the document valid for 7 years.</p> <p>Based on document verification sighted the report of soil and leaf sampling in own estate and smallholders as follows:</p> <ul style="list-style-type: none"> The last soil sampling conducted on 27 May 2016. Parameter that tested is N, C, K, Ca, Mg and pH. Result of leaf sampling analysis are presented in Soil Analysis Lab, No. Lab 1652581 – 1652585 Code of Sample Profile P6. The last leaf sampling conducted on 16 April 2021. Parameter that tested is major element (Ash, N, P, K Mg, Ca) dan Minor element (B, Cu, Zn, Mn, Fe). Result of leaf sampling analysis are presented in Leaf 	Complied

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		<p>Analysis Result Lab. ref.078/INT/R&D/MEI/L/2021 AFD I, dated 16/04/2021, 44 samples; Lab. ref. 078/INT/R&D/MEI/L/2021 AFD II dated 16/04/2021, 42 samples; Lab. ref. 078/INT/R&D/MEI/L/2021 AFD III dated 16/04/2021, 10 samples; Lab. ref. .078/INT/R&D/MEI/L/2021 AFD IV dated 16/04/2021, 4 samples.</p> <p>For the leaf sampling period Y2022, leaf sampling has conducted in May 2022. Result of leaf sampling analysis are presented in Leaf Analysis Result Lab. ref.53/LSU-AGR/04/2022-AFD I, dated 18/04/2022, 44 samples; Lab. ref.53/LSU-AGR/04/2022-AFD II, dated 18/04/2022, 42 samples; Lab. ref.53/LSU-AGR/04/2022-AFD III, dated 18/04/2022, 10 samples. The last Leaf Sampling will be the basis for determining fertilizer recommendations for the year 2023.</p> <p>Those reports are converted to be fertilizer recommendation by Asian Agri's Research and Development Department.</p>							
7.4.3	<p>A nutrient recycling strategy is in place, which include the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.</p>	<p>According to the Agricultural Policy Manual, certificate holder has had a guidance in organic fertilizers such as Empty Fruit Bunch (EFB) and Palm Oil Mill Effluent (POME). Certificate holder has implemented EFB application in estate with dosage 30 – 50 ton/Ha in normal soil and POME with dosage 750 m³/Ha only Sei Lala Estate which is near the Buatan II POM.</p> <p>During this visit, auditor has observed the application of organic and inorganic fertilizers. For example: there is application of HGFB fertilizer with dosage 7.5 gr/palm in Sei Lala Estate and application of EFB in block A15e Afdeling 1 Simpang Perak Estate. Both applications have followed the recommendation stipulated by Asian Agri Research and Development Department.</p> <p>EFB and POME application in 2021 and 2022 (until April):</p> <p>2021</p> <table border="1" data-bbox="1093 1334 1592 1377"> <thead> <tr> <th>Month</th> <th>POME (m³)</th> <th>EFB (MT)</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Month	POME (m ³)	EFB (MT)				Complied
Month	POME (m ³)	EFB (MT)							

January	20,799	2,222
February	16,979	3,773
March	16,846	3,065
April	19,227	2,365
May	19,688	3,857
June	21,703	4,300
July	20,780	957
August	22,152	3,199
September	19,938	2,238
October	17,702	1,752
November	21,930	1,465
December	24,227	1,091
Total	241,971	30,284

2022

Month	POME (m ³)	EFB (MT)
January	22,164	1,526
February	19,370	2,474
March	21,824	1,608
April	21,057	3,434
Total	84,415	9,043

		<p>Scheme Smallholder:</p> <p>Based on interview with plasma manager obtain information that there is no longer EFB application at this time since their area include in replanting plan on 2021 and 2022.</p> <p>According to the interview with smallholder representatives, only KUD Mulus Rahayu, KUD Tani Rukun that still applied the fertilizer according to fertilizer recommendations for their whole areas. Whilst the KUD Mitra Usaha and Makarti Sawit was not applied the fertilizer for their whole areas due to replanting plan in the next two year.</p>																																	
7.4.4	Records of fertilizer inputs are maintained.	<p>The result of leaf sampling analysis, soil sampling analysis along with visual analysis, planting material, planting age and rain fall are considered in proposing the Fertilizer Recommendation.</p> <p>Fertilizer Recommendation and realization for year 2022:</p> <p>Simpang Perak Estate</p> <table border="1" data-bbox="1093 874 1832 1305"> <thead> <tr> <th>Fertilizer</th> <th>Recommendation (Kg)</th> <th>Realization (Kg)</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>AC</td> <td>694,804</td> <td>144,033</td> <td>21</td> </tr> <tr> <td>RP</td> <td>445,917</td> <td>157,198</td> <td>35</td> </tr> <tr> <td>Kieserite</td> <td>22,209</td> <td>22,111</td> <td>100</td> </tr> <tr> <td>Dolomite</td> <td>367,849</td> <td>279,860</td> <td>76</td> </tr> <tr> <td>HGFB</td> <td>32,315</td> <td>1,170</td> <td>4</td> </tr> <tr> <td>NPK</td> <td>159,570</td> <td>158,213</td> <td>99</td> </tr> <tr> <td>MOP</td> <td>581,889</td> <td>128,143</td> <td>22</td> </tr> </tbody> </table> <p><i>Note: realization until June 2022</i></p>	Fertilizer	Recommendation (Kg)	Realization (Kg)	%	AC	694,804	144,033	21	RP	445,917	157,198	35	Kieserite	22,209	22,111	100	Dolomite	367,849	279,860	76	HGFB	32,315	1,170	4	NPK	159,570	158,213	99	MOP	581,889	128,143	22	Complied
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Criteria 7.5: Practices minimise and control erosion and degradation of soils.																																			
7.5.1	(C) Maps that identify marginal and fragile soils, including steep sloped land are available.	<p>Own Estate:</p> <ul style="list-style-type: none"> Simpang Perak Estate is used to be Buatan Estate Division 4 – 7. Soil Analysis in PT Inti Indosawit Subur – Buatan Estate carried out in October – December 2008. Reported under “Laporan Survey Tanah Semidetil Area Perkebunan Kelapa Sawit PT Inti Indosawit Subur Kebun Buatan”. Based on the report, the physiographic location in plain with hilly tuffaceous sedimentary rocks. Lithology parent material is clay and sand. Topographic of the area is rolling to hilly. Natural fertility is low to medium. Soil map scale 1:20,000 available, from semi- detailed soil survey 2008 by R&D Asian Agri. The predominant soil type identified in Division IV, V and VI Buatan Estate composed of Typic dystrodepts 	Complied																																

		<p>(dominant), Typic kandiuults, Typic Endoaquults, Typic endoaquepts.</p> <ul style="list-style-type: none"> • Topographic map scale 1:20,000 available, from semi-detailed soil survey the slope between 0-8%, 8-15%, 15-30% and >30%. The data and field information from semi-detailed soil survey 2008 by R&D Asian Agri. • Soil suitability: S2 2,656 Ha (47.2%) with limiting factor of low natural fertility; S3 2,050 Ha (36.4%) with limiting factor of topographic condition; N1 (not suitable) 925 Ha (16.4%) with limiting factor of slope more than 30% and sandy soil with rapid drainage. <p>Scheme Smallholder: The soil map for all individual member was available at Plasma Buatan office and KUD office with scale 1:50,000. There are 4 series of soil type defined by Research and Development Asian Agri based on soil survey on April 2014 and soil survey semi detail on June 1998:</p> <ol style="list-style-type: none"> 1. Typic Dystrudepts 2. Typic Endoaquepts 3. Typic Endoaquults 4. Typic Kandiuults <p>Soil map and soil survey result recorded in "Laporan Survei Tanah Tinjau Kebun Plasma Buatan".</p>	
7.5.2	The replanting of palm oil is not conducted extensively on steep terrain in accordance with applicable regulations.	Based on field visit in slope area especially in replanting areas known that the management unit has provide terrace contour. For example, in replanting area (Estate and Smallholder). There is no fire usage during that process. The management unit also provide legume cover crop to minimize the soil erosion.	Complied
7.5.3	New palm oil planting is not conducted on steep terrain in accordance with applicable regulations.	There is no new palm oil planting in Simpang Perak Estate.	Complied

Criteria 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.			
7.6.1	<p>(C) Evidence of long-term land suitability for oil palm cultivation, soil maps or soil surveys that identify marginal and fragile soils, including steep terrain are available, in planning and operations.</p>	<p>Based on the document review, the results of the semi-detailed soil survey conducted by Asian Agri Research and Development dated 5 October 2017 found that there were areas that were categorized as non-conditional (N1) covering an area of 925 Ha (16.4% of the total area). To optimize those area, contour terraces and empty bunch applications should be implemented.</p>	Complied
7.6.2	<p>Extensive planting on marginal and fragile soils is avoided or, if necessary, carried out according to the best-practice soil management plan.</p>	<p>Based on soil Analysis carried out by R & D on December 2008 in Buatan Estate. Reported under "Laporan Survey Tanah Semidetil Area Perkebunan Kelapa Sawit PT Inti Indosawit Subur Kebun Buatan". Based on the report, the physiographic location in plain with hilly tuffaceous sedimentary rocks. Lithology parent material is clay and sand. Topographic of the area is rolling to hilly. Natural fertility is low to medium. There is no peat soil identified in Simpang Perak Estate according to the latest soil analysis by R & D Asian Agri.</p> <p>There is no extensive planting within the certified area of PT Inti Indosawit Subur – Simpang Perak Estate and Buatan Plasma in accordance with Soil Analysis Report carried out by R & D on December 2008.</p> <p>KKPA: Whole KKPA area is peatland, PT Inti Indosawit Subur has performed monitoring and minimizing subsidence of peat soils. The organization has several map and documentation of monitoring peat subsidence. Record seen: "Peta Subsiden" (map of subsidence pole), "Peta Pemantauan Muka Air Tanah" (map of piezometer), "Peta Water Level" (map of water level pole), "Peta Drain Blok" (map of block drain), "Rekapitulasi Pengukuran Level Subsistensi Lahan", "Laporan Pemantauan Muka Air Tanah" and "Pengukuran Air Tanah Dangkal".</p>	Complied

7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	<p>Based on soil Analysis carried out by R & D on December 2008 in Buatan Estate. Reported under "Laporan Survey Tanah Semidetil Area Perkebunan Kelapa Sawit PT Inti Indosawit Subur Kebun Buatan". Based on the report, the physiographic location in plain with hilly tuffaceous sedimentary rocks. Lithology parent material is clay and sand. Topographic of the area is rolling to hilly. Natural fertility is low to medium. There is no peat soil identified in Simpang Perak Estate according to the latest soil analysis by R & D Asian Agri.</p> <p>There is no extensive planting within the certified area of PT Inti Indosawit Subur – Simpang Perak Estate and Buatan Plasma in accordance with Soil Analysis Report carried out by R & D on December 2008.</p> <p>KKPA: Whole KKPA area is peatland, PT Inti Indosawit Subur has performed monitoring and minimizing subsidence of peat soils. The organization has several map and documentation of monitoring peat subsidence. Record seen: "Peta Subsiden" (map of subsidence pole), "Peta Pemantauan Muka Air Tanah" (map of piezometer), "Peta Water Level" (map of water level pole), "Peta Drain Blok" (map of block drain), "Rekapitulasi Pengukuran Level Subsiden Lahan", "Laporan Pemantauan Muka Air Tanah" and "Pengukuran Air Tanah Dangkal".</p>	Complied
Criteria 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	(C) No new planting on peatlands, regardless of depth, after 15 November 2018, in existing plantation areas, as well as in new development areas.	There is no new planting within certified area of PT Inti Indosawit Subur – Simpang Perak Estate and Buatan Plasma after November 2005. Currently, replanting activities are still in progress. First cycle starts from year 1988, 1989, 1990 and 1991.	Complied
7.7.2	Peat areas within the managed area are inventoried, documented and reported to the RSPO Secretariat (effective from November 15, 2018).	There is no new planting within certified area of PT Inti Indosawit Subur – Simpang Perak Estate and Buatan Plasma after November 2005. Currently, replanting activities are still in progress. First cycle starts from year 1988, 1989, 1990 and 1991.	Complied

PROCEDURAL NOTE: Maps and other documentation for peatlands are provided, prepared and shared according to the RSPO Working Group (Peatland Working Group / PLWG) audit guide (See Procedural Notes for Indicator 7.7.5 below).			
7.7.3	(C) Subsidence of peat is monitored, documented and minimised.	<p>Simpang Perak Estate is used to be Buatan Estate Division 4 – 7. PT Inti Indosawit Subur – Buatan Estate conducted coordination with R & D department to performed re-analysis of soil in Buatan Estate area to determine whether peat soil is still existed.</p> <p>Soil Analysis carried out by R & D on December 2008 in Buatan Estate. Reported under "Laporan Survey Tanah Semidetil Area Perkebunan Kelapa Sawit PT Inti Indosawit Subur Kebun Buatan". Based on the report, the physiographic location in plain with hilly tuffaceous sedimentary rocks. Lithology parent material is clay and sand. Topographic of the area is rolling to hilly. Natural fertility is low to medium. There is no peat soil identified in Simpang Perak Estate according to the latest soil analysis by R & D Asian Agri.</p> <p>Soil map scale 1:20,000 are available, from semi-detailed soil survey 2008 by R&D Asian Agri. The predominant soil type identified in Buatan Estate composed of:</p> <ul style="list-style-type: none"> • Typic Distrudepts 4,040 ha • Typic Endoaquents 140 ha • Typic Endoaquepts 515 ha • Typic Endoaquults 290 ha • Typic Kandiudults 621 ha • Typic Udipsaments 25 ha • Total 5,361 ha <p>Topographic map scale 1:20,000 available, from semi-detailed soil survey the slope between 0-8%, 8-15%, 15-30% and >30%. The data and field information from semi-detailed soil survey 2017 by R&D Asian Agri. Soil suitability: S2 2,656 Ha (47.2%) with limiting factor of low natural fertility;</p>	Complied

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		<p>water level and piezometer performed twice in a month, whilst peat subsidence monitored in twice in a year.</p>	
<p>7.7.4</p>	<p>(C) Availability of implementation evidence of the water and land cover management program.</p>	<p>Simpang Perak Estate is used to be Buatan Estate Division 4 – 7. PT Inti Indosawit Subur – Buatan Estate conducted coordination with R & D department to performed re-analysis of soil in Buatan Estate area to determine whether peat soil is still existed.</p> <p>Soil Analysis carried out by R & D on December 2008 in Buatan Estate. Reported under "Laporan Survey Tanah Semidetil Area Perkebunan Kelapa Sawit PT Inti Indosawit Subur Kebun Buatan". Based on the report, the physiographic location in plain with hilly tuffaceous sedimentary rocks. Lithology parent material is clay and sand. Topographic of the area is rolling to hilly. Natural fertility is low to medium. There is no peat soil identified in Simpang Perak Estate according to the latest soil analysis by R & D Asian Agri.</p> <p>Soil map scale 1:20,000 are available, from semi-detailed soil survey 2008 by R&D Asian Agri. The predominant soil type identified in Buatan Estate composed of:</p> <ul style="list-style-type: none"> • Typic Distrudepts 4,040 ha • Typic Endoaquents 140 ha • Typic Endoaquepts 515 ha • Typic Endoaquults 290 ha • Typic Kandiudults 621 ha • Typic Udipsaments 25 ha • Total 5,361 ha <p>Topographic map scale 1:20,000 available, from semi-detailed soil survey the slope between 0-8%, 8-15%, 15-30% and >30%. The data and field information from semi-detailed soil survey 2017 by R&D Asian Agri. Soil suitability: S2 2,656 Ha (47.2%) with limiting factor of low natural fertility; S3 2,050 Ha (36.4%) with limiting factor of topographic condition; N1 (not</p>	<p>Complied</p>

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<p>7.7.5</p>	<p>(C) Drainability assessments are conducted for plantations planted on peat following the RSPO Drainability Assessment Procedure, or other method recognized by RSPO, (at least five years or in accordance with the provisions of the RSPO Drainability Assessment Procedure) before replanting. The results of the assessment are used to determine the period of replanting to be carried out, as well as to gradually replace oil palm cultivation for at least 40 years or two cycles, (whichever is longer), before reaching the natural gravitational drainage limit for peat. If oil palm is gradually replaced, it is replaced by other commodity crops that are better suited for higher groundwater levels (paludiculture) or rehabilitated with natural vegetation.</p>	<p>Simpang Perak Estate is used to be Buatan Estate Division 4 – 7. PT Inti Indosawit Subur – Buatan Estate conducted coordination with R & D department to performed re-analysis of soil in Buatan Estate area to determine whether peat soil is still existed.</p> <p>Soil Analysis carried out by R & D in December 2008 in Buatan Estate. Reported under "Laporan Survey Tanah Semidetil Area Perkebunan Kelapa Sawit PT Inti Indosawit Subur Kebun Buatan". Based on the report, the physiographic location in plain with hilly tuffaceous sedimentary rocks. Lithology parent material is clay and sand. Topographic of the area is rolling too hilly. Natural fertility is low to medium. There is no peat soil identified in Simpang Perak Estate according to the latest soil analysis by R & D Asian Agri.</p> <p>Soil map scale 1:20,000 are available, from semi-detailed soil survey 2008 by R&D Asian Agri. The predominant soil type identified in Buatan Estate composed of:</p> <ul style="list-style-type: none"> • Typic Distrudepts 4,040 ha • Typic Endoaquents 140 ha • Typic Endoaquepts 515 ha • Typic Endoaquults 290 ha • Typic Kandiudults 621 ha • Typic Udipsaments 25 ha • Total 5,361 ha <p>Topographic map scale 1:20,000 available, from semi-detailed soil survey the slope between 0-8%, 8-15%, 15-30% and >30%. The data and field information from semi-detailed soil survey 2017 by R&D Asian Agri. Soil suitability: S2 2,656 Ha (47.2%) with limiting factor of low natural fertility; S3 2,050 Ha (36.4%) with limiting factor of topographic condition; N1 (not suitable) 925 Ha (16.4%) with limiting factor of slope more than 30% and</p>	<p>Complied</p>
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		Based on document review, there is no replanting plans for the next 5 years for peatlands in KKPA and Scheme Smallholders. And then the organization commits to conducting drainability assessment prior to replanting.	
<p>PROCEDURAL NOTE: For 7.7.5: Detailed information on the RSPO Drainability Assessment Guide along with related concepts and detailed actions is contained in the Guidelines currently being adjusted / tested by the RSPO Working Group on Peatlands (Peatland Working Group / PLWG). The final version must obtain PLWG approval in January 2019 and will include additional Guide on the steps to be followed after deciding not to replant and the consequences for other stakeholders, farmers, local communities, and the unit of certification concerned. It is recommended that the trial methodology period is proposed to be extended for 12 months for all relevant management units (ie management units that have plantations on peat) to utilize the methodology and provide input to PLWG so that existing procedures can be further refined as needed before January 2020. The unit of certification has the option to delay replanting until the issuance of the revised Guidelines for the guidelines. Additional guidance for alternative commodity crops and rehabilitation of natural vegetation will be regulated by the PLWG.</p>			
7.7.6	<p>(C) All existing plantations on peat are managed according to applicable laws and/or "RSPO Guidelines for Best Management Practices (BMP) for Oil Palm Cultivation that are already on Peatlands", version 3 (June 2019) along with related audit guidelines (May 2019).</p>	<p>Whole KKPA area is peatland, PT Inti Indosawit Subur has performed monitoring and minimizing subsidence of peat soils. The organization has several map and documentation of monitoring peat subsidence. Record seen: "Peta Subsiden" (map of subsidence pole), "Peta Pemantauan Muka Air Tanah" (map of piezometer), "Peta Water Level" (map of water level pole), "Peta Drain Blok" (map of block drain), "Rekapitulasi Pengukuran Level Subsistensi Lahan", "Laporan Pemantauan Muka Air Tanah" and "Pengukuran Air Tanah Dangkal".</p> <p>During the surveillance audit (ASA 2.1 – year 2022), auditor concluded that KKPA areas has been installed with peat monitoring equipment such as piezometer, subsidence pole, and water table in each canal.</p>	Complied
7.7.7	<p>(C) All peat areas not planted and reserved in managed areas (regardless of depth) are protected as 'peatland conservation areas'; unit of certification are prohibited from constructing drainage channels, building roads and new electricity lines on peatlands; unless if it is for a non- corporate land clearance. Peatlands are managed in accordance with 'RSPO Best Management Practices for the Management and Rehabilitation of Natural Vegetation related to Oil</p>	<p>All areas of KKPA are peat areas. Those areas have been equipped with peat monitoring equipment such as piezometer, subsidence pole, and water table in each canal in accordance with RSPO Best Management Practices for Peat.</p>	Complied

	Palm Cultivation that already exists in Peatlands' (the latest version) along with relevant audit guidelines.		
Criteria 7.8: Practices maintain the quality and availability of surface and groundwater.			
7.8.1	<p>A water management plan is available and is implemented to support efficient use of water sources and continuous availability and avoid negative impacts on other users in the catchment. The plan referred to contains the following matters:</p> <p>7.8.1a The unit of certification does not limit access to clean water or does not pollute the water used by the community.</p>	<p>PT Inti Indosawit Subur – Buatan Group has prepared the plan of water management plan as in “Program Manajemen Lingkungan 2022” consist of management water supply for domestic, water consumption and measurement of water quality. Water Management Plan, indicating the water need, permit and licensing, monitoring of water quality, infrastructure maintenance and conservation. The company has conducted measurement of water quality regularly (each semester) and consistent, the result of analysis first semester 2022, shown that water quality is complies with national regulation.</p> <p>PT Inti Indosawit Subur – Buatan II POM has also prepared the procedure on protection of water courses under “SOP Pengendalian Riaprian” number AA-APM-OP-1100.21-R2, dated 25th February 2016.</p> <p>Buatan II POM has permit for surface water usage from “Kementrian Pekerjaan Umum dan Perumahan Rakyat” as per “Keputusan Menteri Pekerjaan Umum dan Perumahan Rakyat nomor 14/KPTS/M/2018 tentang Pemberian izin Pengusahaan Sumber Daya Air kepada PT Inti Indosawit Subur untuk Usaha Industri di Sungai Laniago, Kabupaten Pelalawan dan Kabupaten Siak”, dated 5th January 2018.</p> <p>Buatan II POM also paid the water retribution each month to “UPT Pengelolaan Pendapatan, Badan Pendapatan daerah Pemerintah Provinsi Riau”.</p> <p>Sample verified: SPPD (Surat Setoran Pajak Daerah) untuk Pajak Pengambilan dan Pemanfaatan Air Permukaan untuk period January – March 2022, dated 4 April 2022, IDR XX.756.00</p> <p><u>Scheme smallholders:</u></p>	Complied

		<p>All KUD has program on water management as in "Rencana dan Realisasi Penyusunan Pelapah Letter "U", frond stacking. "Rencana dan Realisasi Perawatan Teresan sebagai Sarana Konservasi Tanah dan Air serta Upaya Pencegahan Erosi"</p>	
	<p>7.8.1b Workers have adequate access to clean water.</p>	<p>PT Inti Indosawit Subur – Buatan II POM has prepared the plan of water management plan as in "Program Manajemen Lingkungan 2022" consist of management water supply for domestic, water consumption and measurement of water quality. Water Management Plan, indicating the water need, permit and licensing, monitoring of water quality, infrastructure maintenance and conservation.</p> <p>The result of monitoring or testing the clean water / water consumption conducted by "Unit Pelaksana Teknisi Laboratorium Bahan Konstruksi", Pekanbaru.</p> <p>Certificate of Analysis for Domestic Water (by cooking treatment), location in Buatan II POM – Report of Analysis No: MT.24/01.06.423.31, dated 23 March 2022 the reference of analysis report is based on PERMENKES NO 492/MENKES/PER/IV/2010</p>	
<p>7.8.2</p>	<p>(C) Water courses and wetlands are protected, including the maintenance and restoration of riparian zones and other buffer zones during or before replanting, in accordance with the "RSPO Manual on BMPs for the management and rehabilitation of riparian reserves" (April 2017) or Simplified Guide Management and Rehabilitation of Riparian Reserves (2018).</p>	<p>PT Inti Indosawit Subur – Buatan II POM has establish management plan to protect water courses and wetlands, including securing and maintaining appropriate riparian.</p> <ul style="list-style-type: none"> • Riparian restoration with forest vegetation plant/tree. • Establish zone for zero chemical. No spraying and fertilizing along riparian zone. Based on visit in riparian zone (Sempadan Sungai Laniago) in block BA90 • Conserve natural vegetation in riparian zone <p>Restricted to conduct replanting palm oil in riparian area</p>	<p>Complied</p>

<p>7.8.3</p>	<p>Mill effluent is managed according to applicable regulations. The quality of mill effluent discharged, especially BOD (Biochemical Oxygen Demand) is monitored in accordance with applicable regulations.</p>	<p>For mill effluent treatment, Buatan II Palm Oil Mill (PBD) has 11 ponds in effluent treatment system (WWTP), which consists of Colling Pond, Primary Anaerobic Pond, Secondary Anaerobic Pond, Acidification Pond, and Buffering Pond. Procedure of WWTP operation available in Mill Policy Manual (MPM) dated 1 February 2013, chapter AA-MPM-OP-1400.13-R1.</p> <p>Buatan II POM is planned for Biogas power plant construction in 2021 to generate electrical power by using wastewater treatment. The biogas system has Anaerobic MBR system through digester Thermophilic fermentation, and anaerobic membrane tank.</p> <p>According to effluent monitoring data, all produced mill effluent used for land application. Mill holds permit to discharge wastewater into land application from local authority through Decree number KTPS.660/BLH/781/2014, issued on 10 September 2014 valid for 5 years. Total area of land application covers 1,137ha at Block B, C, D, E, F.</p> <p>As required by LA permit, Mill conducts monthly check on discharged effluent in cooperation with accredited Laboratory (UPT Pengujian Material, Dinas Bina Marga Provinsi Riau). According to recent testing result, BOD level of applied effluent has met the applicable threshold of KepmenLH No.28/2003 regarding BOD limits of effluent discharge for land application. The level is maintained consistently less than 5,000 mg/L and debit <600 m³ per day.</p> <p>Sample seen year 2022:</p> <table border="1" data-bbox="1093 1121 1917 1351"> <thead> <tr> <th>Month - 2022</th> <th>BOD (mg/l) – standard of quality 5,000</th> <th>pH – standard of quality 6-9</th> </tr> </thead> <tbody> <tr> <td>January</td> <td>2,410</td> <td>7.24</td> </tr> <tr> <td>February</td> <td>2,940</td> <td>7.30</td> </tr> <tr> <td>March</td> <td>2,720</td> <td>7.24</td> </tr> </tbody> </table>	Month - 2022	BOD (mg/l) – standard of quality 5,000	pH – standard of quality 6-9	January	2,410	7.24	February	2,940	7.30	March	2,720	7.24	<p>Complied</p>
Month - 2022	BOD (mg/l) – standard of quality 5,000	pH – standard of quality 6-9													
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		<table border="1"> <tr> <td>April</td> <td>2,100</td> <td>7.86</td> </tr> <tr> <td>May</td> <td>2,340</td> <td>7.11</td> </tr> <tr> <td>June</td> <td>2,780</td> <td>7.24</td> </tr> </table> <p>Based on result of monitoring January – June 2022 shown comply with legal requirement “PermenLHK No P.68/Setjen/Kum1/8/2016”.</p>	April	2,100	7.86	May	2,340	7.11	June	2,780	7.24										
April	2,100	7.86																			
May	2,340	7.11																			
June	2,780	7.24																			
7.8.4	Mill water use per tonne of FFB is monitored and recorded.	<p>Buatan II POM has recorded the mill water use per ton FFB, includes monitoring of water usage for mill processing and domestic usage. Result of water usage monitoring is recorded under “Mill Operation Summary” year 2022. Budget in 2022 is 1.10 M³/Ton FFB.</p> <p>Record in January – June 2022 has shown:</p> <table border="1"> <thead> <tr> <th>Month - 2022</th> <th>Water use per ton FFB</th> </tr> </thead> <tbody> <tr> <td>January</td> <td>1.12</td> </tr> <tr> <td>February</td> <td>0.87</td> </tr> <tr> <td>March</td> <td>0.97</td> </tr> <tr> <td>April</td> <td>0.92</td> </tr> <tr> <td>May</td> <td>0.89</td> </tr> <tr> <td>June</td> <td>1.19</td> </tr> <tr> <td>July</td> <td>1.12</td> </tr> <tr> <td>YTD</td> <td>(budget YTD 1.03)</td> </tr> </tbody> </table>	Month - 2022	Water use per ton FFB	January	1.12	February	0.87	March	0.97	April	0.92	May	0.89	June	1.19	July	1.12	YTD	(budget YTD 1.03)	Complied
Month - 2022	Water use per ton FFB																				
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July	1.12																				
YTD	(budget YTD 1.03)																				
Criteria 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised																					
7.9.1	Plans to increase the efficiency of fossil fuel use and to optimize renewable energy are available, monitored and documented	PT Inti Indosawit Subur – Buatan II POM has prepared the program for improving efficiency of the use of fossil fuels and to optimize renewable	Complied																		

energy under "Rencana Manajemen Lingkungan" year 2022. In point 2 stated to improving efficiency of the use of fossil fuels such monitoring on use of fossil fuels

Fossil fuel records was maintenance and the trends shown. Energy use records include accurate measurements of renewable energy use per ton of FFB processed. All the shell and fiber are consumed internally as boiler fuel. Fossil fuel usage is recorded for operational purpose, including the efficiency analysis.

Data verified: Energy resources for Generator and Turbine operation, year 2022:

Month	Genset (KWH)	Turbine (KWH)
January	34,945	418,100
February	21,408	414,000
March	43,683	478,850
April	21,408	416,600
May	46,816	418,100
June	41,792	425,000
July	26,254	432,010

Scheme Smallholders:

Each KUD (KUD Mulus Rahayu, KUD Tani Rukun, KUD Mitra Usaha and KUD Makarti Sawit) has prepared a plan for improving efficiency of the use of fossil fuels and optimize of renewable energy under "Pedoman Pemanfaatan Sumber Energy", last review on 15 January 2022. The source of energy was identified e.g.: water, gasoline, fuels, kerosene and electrical.

Criteria 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.			
7.10.1	<p>(C) GHG emissions for the unit of certification are identified and assessed. Plans to reduce or minimize GHG emissions are implemented, monitored through the PalmGHG calculator, and reported publicly.</p>	<p>PT Inti Indosawit Subur – Buatan II POM has identified the emission sources and pollution under document of “Environmental Aspect-Impacts (Evaluasi Aspek-Dampak Lingkungan) year 2022”.</p> <p>Identification of greenhouse gas (GHG) emissions sources both of Mill, Estate and Smallholders consist of emission from boiler and generator, effluent from mill wastewater, particulate from boiler stack, noise, fertilizer application, fossil fuels usage, transport of FFB</p> <p>The assessment of pollution activities was documented in “Mitigasi Has Rumah Kaca”. All the activities of mill and estate as well as the waste generated has been well documented, for examples the operational activity from generator is generates air emissions, the company conducts periodic generator maintenance and perform quality measurement of exhaust emissions each semester to ensure air quality is comply with standard regulation.</p> <p><u>Scheme Smallholder:</u></p> <p>Manager of Kebun Plasma Buatan has prepared the list significant pollutants and identify sources of emissions, presented in “Identifikasi Sumber Polusi di Perkebunan Petani Kebun Plasma Buatan PT Inti Indosawit Subur 2022”. List of significant pollutant such as emission from FFB transportation, water pollutant from fertilizing and spraying activity, emission from generator usage.</p>	Complied
7.10.2	<p>(C) Since 2014, an estimate of carbon stocks in the proposed development area has been carried out along with potential sources of emissions that can occur directly as a result of the development and plans to minimize these emissions are prepared and implemented</p>	<p>There is no new planting within certified area of PT Inti Indosawit Subur – Simpang Perak Estate and Scheme smallholders after November 2005. Currently, replanting activities are still in progress. All the immature area was for replanting, for oil palm with planting year 1988, 1989, 1990 and 1991.</p>	Not Applicable

	(following the RSPO GHG Assessment Procedure for New Development).		
7.10.3	(C) Other significant pollutant identification results are available and plans to reduce or minimize them are implemented and monitored.	<p>PT Inti Indosawti Subur – Buatan II POM has identified the significant pollutants and greenhouse gas (GHG) emissions.</p> <p>Significant pollutants and GHG such as: Emission, particulate, noise from boiler and generator, effluent from mill wastewater, fertilizer application, chemical applicator, and transport of FFB.</p> <p>Monitoring of air emissions and ambient air quality conducted every semester. Emissions test conducted testing by Accreditation Laboratory. The results of the analysis have been demonstrated and reported to Environmental Agency every six months, e.g.:</p> <p>Subject of analysis for air emission and Air Ambient in Simpang Perak Estate - Report of sampling and analysis: certificate No 0000465/CLAIAL, month May 2022 conducted by Sucofindo, the result is comply with Environmental Minister Decree No Kep-13/MENLH/2009, attachment I and The Labor Minister Decree No Kep-13/MEN/2011.</p>	Complied
Criteria 7.11: Fire is not used for preparing land and is prevented in the managed area.			
7.11.1	(C) Land for new planting or replanting is not prepared by burning.	<p>PT Inti Indosawit Subur – Buatan has developed an early warning system, to monitor the risk of fire. The system “Sistem Peringkat Bahaya Kebakaran 1 & 2”. The monitoring system calculating the field condition, ignition risk, potential drought and smoke, fire handling, firefighting difficulty, and weather index. Patrol report indicating any fire incident.</p> <p>Based on field visit in Simpang Perak Estate the land preparation is using mechanical method. No open burning was noted for land preparation. It can also demonstrate in the agreement contract between compay and subcontractor that all activity of replanting is performed manual and mechanically.</p> <p><u>Scheme Smallholder:</u></p>	Complied

		<p>There was not any open burning was noted for land preparation and any activity in KUD Bhirawa Bhakti and KUD Sawit Harapan. Replanting plan has been drawn up soon. The replanting plan was available under "S Pelaksanaan Replanting Kebun Plasma Buatan".</p> <p>During field visit at KUD Mulus Rahayu, KUD Tani Rukun, KUD Mitra Usaha and KUD Makarti Sawit, there was a replanting and no burning activity. The land preparation is using mechanical method.</p>	
7.11.2	The unit of certification establishes fire prevention and control measures for lands that are directly managed by the unit of certification.	<p>There is no new planting within certified area of PT Inti Indosawit Subur – Simpang Perak Estate and Scheme smallholders after November 2005. Currently, replanting activities are still in progress. All of the immature area was for replanting, for oil palm with planting year 1988, 1989, 1990 and 1991.</p> <p>Replanting has been done mechanically, consist of falling tree, chipping by excavator, terracing by excavator, digging, road construction, ditch/waterways construction, planting LCC and planting oil palm. Company has established "Ketentuan Replanting areal Mineral" tahun 2016. In the mechanism explained that replanting must be conducted mechanically without burning.</p> <p>Based on field visit in Simpang Perak Estate the land preparation is using mechanical method. No open burning was noted for land preparation. It can also demonstrate in the agreement contract between company and subcontractor that all activity of replanting is performed manual and mechanically.</p> <p>During field visit at KUD Mulus Rahayu, KUD Tani Rukun, KUD Mitra Usaha and KUD Makarti Sawit, there was a replanting and no burning activity. The land preparation is using mechanical method.</p>	Complied
7.11.3	The unit of certification engages stakeholders in adjacent locations for fire prevention and control measures.	<p>The policy was communicated to all smallholders remember and local community to engages stakeholders in adjacent locations for fire prevention and control measures, e.g.: Record of refreshment</p>	Complied

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		<p>socialization in KUD Mulus Rahayu, KUD Tani Rukun, KUD Mitra Usaha and KUD Makarti Sawit, was conducted in February 2022.</p> <p>Replanting has been done mechanically, consist of falling tree, chipping by excavator, terracing by excavator, digging, road construction, ditch/waterways construction, planting LCC and planting oil palm.</p> <p>PT Inti Indosawit Subur – Simpang Perak Estate has established “Ketentuan Replanting areal Mineral” year 2016. In the mechanism explained that replanting must be conducted mechanically without burning.</p>	
<p>Criteria 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.</p>			
<p>PROCEDURAL NOTE for 7.12:</p> <p>The RSPO Principles and Criteria 2018 include new requirements to ensure the effective contribution of the RSPO in stopping deforestation. This will be achieved by incorporating the High Carbon Stock Approach (HCSA) Approach Guide into the revised standard.</p> <p>The RSPO ToC also encourages RSPO to commit to balancing between sustainable livelihoods and reducing poverty with the need to conserve, protect and improve the quality of ecosystems.</p> <p>High Forest Cover Countries (HFCC) are in dire need of economic opportunities that can help people choose their own path in carrying out development, while at the same time providing social and economic benefits and safeguards.</p> <p>Procedures will be developed that are adapted to support the development of sustainable palm oil by indigenous peoples and local communities who have legal or customary rights. The procedure will apply in certain HFCC countries and in the High Forest Cover Landscape (HFCL) within it.</p> <p>The development of this procedure will be guided by the No Deforestation Joint Steering Group (NDJSG) between the RSPO and HCSA members. In HFCC countries, RSPO will work with governments, communities and other stakeholders to develop this procedure through participatory processes at national and regional levels. The duration of this activity is specified in the Terms of Reference for NDJSG and is publicly available.</p>			
7.12.1	<p>(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCV or HCS forests.</p>	<p>There is no new planting within certified area of PT Inti Indosawit Subur – Simpang Perak Estate and Buatan Plasma after November 2005. Simpang Perak Estate has planted since 1988 – 1991 while Buatan Plasma has planted since 1988 - 1993. Currently, replanting activities are still in</p>	Not Applicable

	<p>Historical analysis of Land Use Change Analysis (LUCA) is carried out before any new land clearing, in accordance with the RSPO LUCA Guidance document (see indicator 7.12.2).</p>	<p>progress. Replanting has been started since 2014 – 2020 and still continue until 2024. This indicator not applicable.</p>	
<p>7.12.2</p>	<p>(C) HCV and HCS forests, and other conservation areas are identified as follows: 7.12.2a) For existing plantations, with an HCV assessments conducted by RSPO- approved assessors and have no new land clearing after 15 November 2018, the existing HCV assessments remains valid.</p>	<p>Simpang Perak Estate and Scheme Smallholder: PT Inti Indosawit Subur – Buatan Estate has conducted the HCV identification in coordination with “Fakultas Kehutanan Institut Pertanian Bogor” on March – April 2009, under “Laporan Final Kajian Penuh Identifikasi dan Analisis Keberadaan High Conservation Value di Areal PT Inti Indosawit Subur, Kebun Buatan Provinsi Riau”. The HCV assessment conducted based on “Panduan Kawasan Bernilai Konservasi Tinggi di Indonesia”, issued by Konsorsium Revisi HCV Toolkit Indonesia dated 12/07/2008. Based on HCV identification total HCV area identified was 55.56 ha in Buatan Estate and Simpang Perak Estate. Simpang Perak Estate previously was include in Buatan Estate (Division IV, V, VI and VII). Curently those division was separated from Buatan Estate and has its own estate namely Simpang Perak estate however the size of HCV area are remain same and not change. Division I, II and III as supply base Buatan I POM and Simpang Perak Estate Division (<i>previously was division IV, V, VI and VII currently changing to become division I - IV</i>) as supply base Buatan II POM. So that the HCV area in Simpang Perak Estate as supply base Buatan II POM was 27.78 ha. HCV identified in Buatan Estate & Simpang Perak Estate consist of:</p> <ul style="list-style-type: none"> - HCV 1.1, 1.2 and 4.1: Riparian zone Kerinci Besar River (38.9 Ha); - HCV 1.1, 1.2 and 4.1: Riparian zone Laniago River (4.50 Ha); - HCV 1.2 and HCV 6: Conservation forest for Manggeris trees (Pohon Madu): 10.5 Ha; - HCV 1.2 and HCV 6: Conservation forest for Manggeris trees (Pohon Madu): 3.60 Ha; 	<p>Not Applicable</p>

		<p>- HCV 6: ancient graveyard: 0.66 Ha;</p> <p>HCV identification was consulted to the relevant stakeholder and HCV maps is available and in place. HCV assessment also including Buatan Smallholder area and used in scheme smallholder operation.</p> <p>The HCV identification document has explained the general condition of landscape surrounding company's plantation: there is no protected forest/ecosystem that feasible for wildlife to maintain its viability. Therefore no recommendation for wildlife corridor.</p>	
	7.12.2 b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the latest HCSA Toolkit and HCV-HCSA Assessment Manual that is applicable at the time of the assessment. This includes stakeholder consultation and take into account wider landscape- level consideration.	<p>There is no new planting within certified area of PT Inti Indosawit Subur – Simpang Perak Estate and Buatan Plasma after November 2005. Simpang Perak Estate has planted since 1988 – 1991 while Buatan Plasma has planted since 1988 - 1993. Currently, replanting activities are still in progress. Replanting has been started since 2014 – 2020 and still continue until 2024.</p> <p>This indicator not applicable.</p>	
7.12.3	(C) In High Forest Cover Landscapes (HFCLs) within HFCCs, a specific procedure will apply for legacy cases and development by indigenous peoples and local communities with legal or customary rights, taking into consideration regional and national multi-stakeholder processes. Until this procedure is developed and endorsed, 7.12.2 applies.	<p>There is no new planting within certified area of PT Inti Indosawit Subur – Simpang Perak Estate and Buatan Plasma after November 2005. Buatan Estate has planted since 1988 – 1991 while Buatan Plasma has planted since 1988 - 1993. Currently, replanting activities are still in progress. Replanting has been started since 2014 – 2020 and still continue until 2024.</p> <p>This indicator not applicable.</p>	Not Applicable
<p>PROCEDURAL NOTE for 7.12.3: Indicator 7.12.3. is not relevant to Indonesia, until further decisions by the RSPO.</p>			
7.12.4	(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An Integrated management plans to protect and/or enhance HCV and HCS forests, peatland and other conservation areas	<p>There is no new planting within certified area of PT Inti Indosawit Subur – Simpang Perak Estate and Buatan Plasma/scheme smallholder after November 2005. Buatan Estate has planted since 1988 – 1991 while Buatan Plasma has planted since 1988 - 1993. Currently, replanting</p>	Complied

	<p>are developed, implemented and adapted if necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan was developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p>	<p>activities are still in progress. Replanting has been started since 2014 – 2020 and still continue until 2024.</p> <p>PT Inti Indosawit Subur – Simpang Perak Estate has develop the Conservation Management Plan 2021 and 2022. Evidence Continous monitoring documentation and report regarding the status of RTE species and HCV presented in “Laporan Monitoring tumbuhan dan Satwaliar PT Inti Indosawit Subur, Kebun Buatan” Periode January – June 2021 and Juli – December 2021”.</p> <p>Monitoring documentation such as: “Daftar Temuan Satwa liar di Areal kebun” contain information regarding result of wildlife and RTE species monitoring, “Tabel Monitoring Kerusakan Kawasan Lindung” contain information regarding result of HCV area monitoring and HCV condition monitoring such as illegal hunting, HCV area disturbance, and HCV condition. Latest monitoring both RTE species and HCV area conducted on December 2021. Sample seen: Wildlife monitoring in Block F89b, Block A90c, Riparian of laniago river, Riparian of Kerinci Kanan river, Block 52, found presence of animal such as: <i>Aethopyga siparaja</i>, <i>Halcyon pileata</i>, <i>Centropus sinensis</i>, <i>Naja sumatrana</i>, <i>Macaca fascicularis</i>, <i>Tupaia tana</i>. Monthly monitoring of HCV area condition and animal species also performed by Foreman HCV (Adi Surya P) and each Foreman Afdeling, animal presence recorded in “Daftar Temuan Satwa Liar.</p> <p>Evaluation to the effectiveness of management and monitoring plan implementation reported each semester in “laporan Monitoring tumbuhan dan Satwaliar PT Inti Indosawit Subur, Kebun Buatan”. Evaluation result and recommendation of management and monitoring contain in the report. This recommendation give the feedback and improvement to conservation management plan. HCV socialization to Buatan II POM and Simpang Perak Estate has been conducted on 4 – 9 May 2022.</p> <p>Company also has implemented appropriate sanction disciplinary measures to any individual working for the company who is found to</p>	
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		<p>capture, harm, collect or kill these species. Sanction and process based on UU No. 5 tahun 1990. Based on interview with worker representative and field workers – workers have understand protection of plant and animal. The workers also aware of company policy prohibits hunting, raising and killing protected animal.</p> <p>Scheme Smallholder: Each KUD has appointed person in charge to monitor the RTE species presence in smallholder plantation area:</p> <ul style="list-style-type: none"> - KUD Makarti Sawit: Surat Keputusan Pengurus KUD Makarti Sawit Nomor: 03/Kpts/MS/VII/2018 dated 10 July 2018 Tentang Penunjukan atau Pengangkatan Petugas Perlindungan dan Pengawasan Satwa Liar dan Tumbuhan Dilindungi. apointed person: Setiyadi. - KUD Mitra Usaha: Surat Keputusan Pengurus KUD Mitra Usaha Nomor:115/Kpts/KUD-MU/XI/2019 dated 12 November 2019 Tentang Penunjukan atau Pengangkatan Petugas Perlindungan dan Pengawasan Satwa Liar dan Tumbuhan Dilindungi. apointed person: Mulyana. - KUD Tani Rukun: Surat Keputusan Pengurus KUD Tani Rukun Nomor:01/Kpts/XII/2018 dated 18 Desember 2018 Tentang Penunjukan atau Pengangkatan Petugas Perlindungan dan Pengawasan Satwa Liar dan Tumbuhan Dilindungi. apointed person: Sariono. - KUD Mulus Rahayu: Surat Keputusan Pengurus KUD Mulus Rahayu Nomor:03/Kpts/MR/VII/2018 dated 10 July 2018 Tentang Penunjukan atau Pengangkatan Petugas Perlindungan dan Pengawasan Satwa Liar dan Tumbuhan Dilindungi. apointed person: Sunar. <p>Monitoring for RTE species performed each month by PIC. Result of monitoring presented in "Daftar Temuan Satwa Yang Dilindungi Tahun 2022". During January – ytd June 2022, shown that in KUD Makarti Sawit, KUD Mitra Usaha, KUD Tani Rukun, KUD Mulus Rahayu there were</p>	
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		presence of animal such as: Sanca Bodo (<i>Python bivittatus</i>), Kucing hutan (<i>Prionailurus bengalensis</i>), Biawak (<i>Varanus salvator</i>), Elang Tikus (<i>Elanus caeruleus</i>), Tupai tanah (<i>Tupaia sp</i>), Burung Madu (<i>Nectarinia jugularis</i>) and Cekakak Belukar (<i>Halcyon smyrnensis</i>).	
7.12.5	Where rights of local communities have been identified in HCV areas and HCS forest after 15 November 2018, peatland and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.	There is no new planting within certified area of PT Inti Indosawit Subur – Simpang Perak Estate and Buatan Plasma after November 2005. Buatan Estate has planted since 1988 – 1991 while Scheme Smallholder Buatan Plasma has planted since 1988 - 1993. Currently, replanting activities are still in progress. Replanting has been started since 2014 – 2020 and still continue until 2024. This indicator not applicable.	Not Applicable
7.12.6	All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.	PT. Inti Indosawit Subur – Buatan II POM and Estate has a program to socialize the status of protected, rare, threatened or endangered (RTE) to all workers, it was also programed each year as per "Conservation Management Plan". Socialization has been conducted through master morning in each division by field assistant, latest refreshment to workers on 4 – 9 May 2022. Company also provides signboard regarding HCV protection and RTE species protection in the strategic place as a campaign to give awareness to the workers/people. Company also implemented appropriate sanction disciplinary measures to any individual working for the company who is found to capture, harm, collect or kill these species. Sanction and process based on UU No. 5 tahun 1990. Interview with workers regarding their understanding on RTE species protection will be conducted during onsite audit later. Scheme Smallholder: Training & Socialization has been provided to the individual members about the status of HCV and RTE species and the applicable disciplinary measures. Training was conducted in each KUD by plasma management	Complied

		<p>on November 2021. The training and socialization was attend by smallholder member representative and KUD official from each KUD, the venue of training was in KUD office. Minutes of training and attendant list were available.</p> <p>During onsite audit and interview with smallholder member confirmed that they have sufficient understanding on RTE species protection and prohibition of illegal hunting.</p>	
7.12.7	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p>	<p>There is no new planting within certified area of PT Inti Indosawit Subur – Simpang Perak Estate and Buatan Plasma after November 2005. Simpang Perak Estate has planted since 1988 – 1991, while Scheme Smallholder Buatan Plasma has planted since 1988 - 1993. Currently, replanting activities are still in progress. Replanting has been started since 2014 – 2020 and still continue until 2024.</p> <p>Simpang Perak Estate and Scheme Smallholder:</p> <p>PT Inti Indosawit Subur – Simpang Perak Estate has conducted the HCV identification in coordination with “Fakultas Kehutanan Institut Pertanian Bogor” on March – April 2009, under “Laporan Final Kajian Penuh Identifikasi dan Analisis Keberadaan High Conservation Value di Areal PT Inti Indosawit Subur, Kebun Buatan Provinsi Riau”. The HCV assessment conducted based on “Panduan Kawasan Bernilai Konservasi Tinggi di Indonesia”, issued by Konsorsium Revisi HCV Toolkit Indonesia dated 12/07/2008.</p> <p>Based on HCV identification total HCV area identified was 55.56 ha in Buatan Estate and Simpang Perak Estate.</p> <p>Simpang Perak Estate previously was include in Buatan Estate (Division IV, V, VI and VII). Currently those division was separated from Buatan Estate and has its own estate namely Simpang Perak estate however the size of HCV area are remain same and not change. Division I, II and III as supply base Buatan I POM and Simpang Perak Estate Division (<i>previously was division IV, V, VI and VII currently changing to become</i></p>	Complied

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		<p><i>division I - IV</i>) as supply base Buatan II POM. So that the HCV area in Simpang Perak Estate as supply base Buatan II POM was 27.78 ha.</p> <p>HCV identified in Buatan Estate & Simpang Perak Estate consist of:</p> <ul style="list-style-type: none"> - HCV 1.1, 1.2 and 4.1: Riparian zone Kerinci Besar River (38.9 Ha); - HCV 1.1, 1.2 and 4.1: Riparian zone Laniago River (4.50 Ha); - HCV 1.2 and HCV 6: Conservation forest for Manggeris trees (Pohon Madu): 10.5 Ha; - HCV 1.2 and HCV 6: Conservation forest for Manggeris trees (Pohon Madu): 3.60 Ha; - HCV 6: ancient graveyard: 0.66 Ha; <p>PT. Inti Indosawit Subur – Buatan II POM and Estate has a program to socialize the status of protected, rare, threatened or endangered (RTE) to all workers, it was also programed each year as per “Conservation Management Plan”. Socialization has been conducted through master morning in each division by field assistant, latest refreshment to workers on 4 – 9 May 2022. Company also provides signboard regarding HCV protection and RTE species protection in the strategic place as a campaign to give awareness to the workers/people.</p> <p>Company also implemented appropriate sanction disciplinary measures to any individual working for the company who is found to capture, harm, collect or kill these species. Sanction and process based on UU No. 5 tahun 1990.</p>	
7.12.8	<p>(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV- HCSA assessment since 15 November 2018, the Remediation and Compensation Procedures (RaCP) applies.</p>	<p>There is no new planting within certified area of PT Inti Indosawit Subur – Simpang Perak Estate and Buatan Plasma after November 2005. Simpang Perak Estate has planted since 1988 – 1991, while Scheme Smallholder Buatan Plasma has planted since 1988 - 1993. Currently, replanting activities are still in progress. Replanting has been started since 2014 – 2020 and still continue until 2024.</p> <p>This indicator not applicable.</p>	Not Applicable

Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in 2021 for Buatan II POM and supply base was calculated using the PalmGHG Calculator version 4. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

- i. Estates area planted data
- ii. Fuel consumed
- iii. Mill datas include CPO produced, PKO Produced and FFB Processed
- iv. Fertilizer consumed data for both estates and smallholders.

The summary of the Net GHG emitted in 2021 for Buatan II POM and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	0.72
PKO	0.72

Extraction	%
OER	18.89
KER	5.31

Production	t/yr
FFB Process	310,751
CPO Produced	55,947
PKO Produced	16,272

Land Use	Ha
OP Planted Area	11,752
OP Planted on peat	0
Conservation (forested)	0
Conservation (non-forested)	35,4
Total	11,787.4

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	3,041.42	1.34	14,714.54	0.00	0.00	0.00	4,041.42	1.34
CO ₂ Emission from fertilizer	435.70	0.01	2,901.88	0.04	0.00	0.00	2,717.58	0.01
NO ₂ Emission	263.32	0.01	2,396.97	0.04	0.00	0.00	2,700.29	0.01
Fuel Consumption	510.05	0.04	750.70	0.01	0.00	0.00	760.75	0.00
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sink								
Crop Sequestration	-3,830.73	-1.27	0.00	0.00	0.00	0.00	-5,830.73	-1.27
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	4,339.75	0.8	6,649.56	0.06	0.00	0.00	24,157.25	0.11

*Note: Includes both estates and smallholders

Summary of Mill Emission and Credit

	tCO _{2e}	tCO _{2e} /tFFB
Emission		
POME	4,415.07	0.15
Fuel Consumption	285.28	0.00
Grid Electricity Utilization	21.00	0.00
Credit		
Export of Grid Electricity	-62.09	0.00
Sales of PKS	-19,175.40	-0.08
Sales of EFB	0.00	0.00
Total	37,167.13	0.09

Summary of Kernel Crusher Emission and Credit (if applicable)

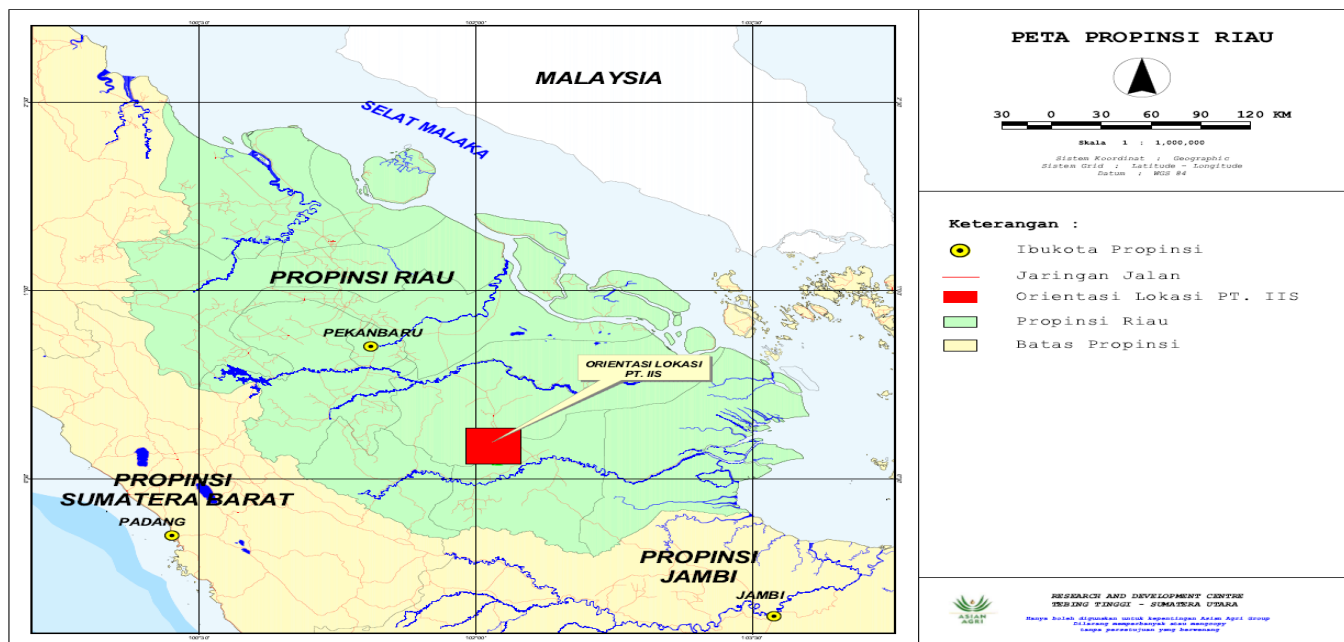
Emissions	tCO _{2e}
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	0.00
Total Crusher emissions	0.00

*This mill has no kernel crusher operation.

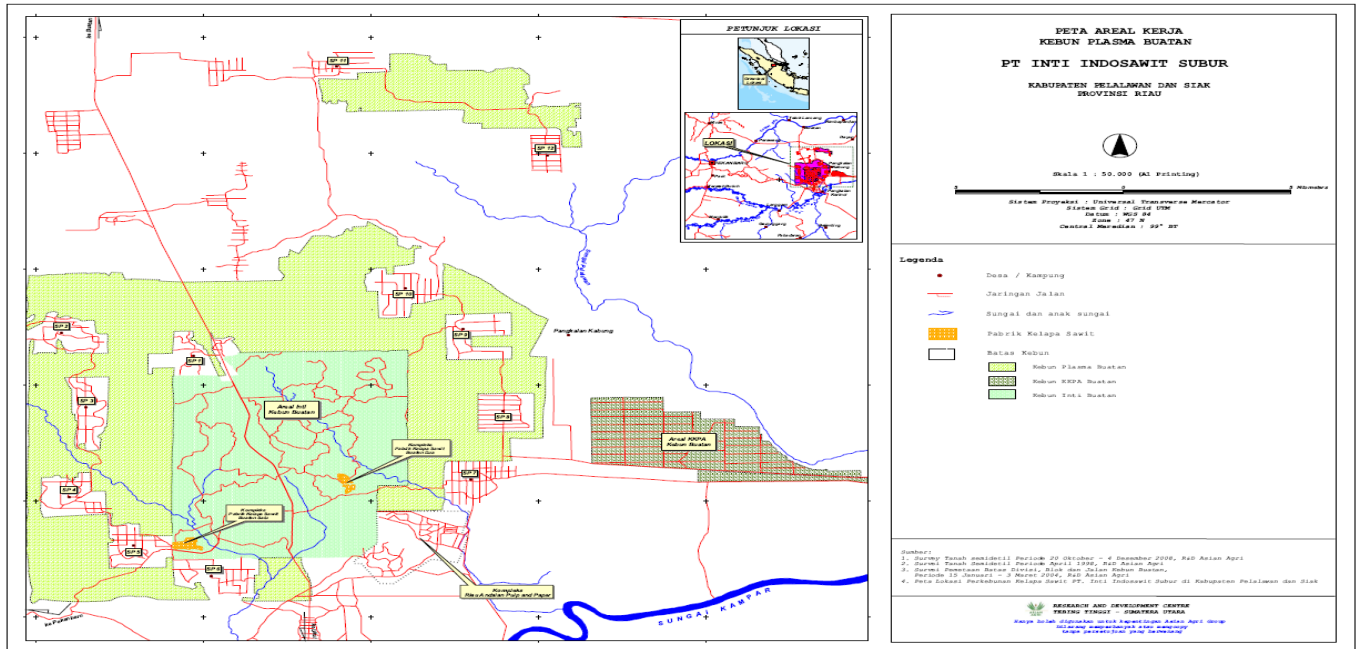
Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	0
Divert to anaerobic diversion (%)	100

POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	100
Divert to methane captured (flaring) (%)	0
Divert to methane captured (energy generation) (%)	0

Appendix C: Location Map of Certification Unit and Supply bases



Appendix D: Estate Field Map



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Appendix E: List of Smallholder Registered and/or sampled

No	Name of farmer	Location	GPS Reference		Area Summary (Ha)		Forecasted annual FFB Production (MT)	Date of joining
			Latitude (N)	Longitude (E)	Total Certified Area	Planted Area		
1	Misbah	KUD Mulus Rahayu	0° 31' 31.4"	101° 50' 06.7"	2	2	38	1988
2	Sugeng Widodo	KUD Mulus Rahayu	0° 31' 36.7"	101° 49' 52.1"	2	2	38	1988
3	Pawito	KUD Mulus Rahayu	0° 31' 35.5"	101° 49' 48.4"	2	2	38	1988
4	M Adi Firmanto	KUD Mulus Rahayu	0° 31' 24.6"	101° 49' 52.2"	2	2	38	1988
5	Ngadimin	KUD Mulus Rahayu	0° 31' 36.7"	101° 49' 52.1"	2	2	38	1988
6	Arif	KUD Mulus Rahayu	0° 31' 31.4"	101° 50' 06.7"	2	2	38	1988
7	Sampurno	KUD Mulus Rahayu	0° 31' 30.4"	101° 50' 01.5"	2	2	38	1988
8	Dedi	KUD Mulus Rahayu	0° 31' 36.7"	101° 49' 52.1"	2	2	38	1988
9	Sulis H (Dede Supendi)	KUD Mulus Rahayu	0° 31' 36.7"	101° 49' 52.1"	2	2	38	1988
10	Mahmud (Ihsanudin)	KUD Mulus Rahayu	0° 31' 36.7"	101° 49' 52.1"	2	2	38	1988
11	Minarsih	KUD Mulus Rahayu	0° 31' 36.7"	101° 49' 52.1"	2	2	38	1988
12	Ruslan Jamil	KUD Mulus Rahayu	0° 31' 36.7"	101° 49' 52.1"	2	2	38	1988
13	Rasno Diharjo	KUD Mulus Rahayu	0° 31' 36.7"	101° 49' 52.1"	2	2	38	1988
14	Marsono	KUD Mulus Rahayu	0° 31' 36.7"	101° 49' 52.1"	2	2	38	1988
15	Kiyat	KUD Mulus Rahayu	0° 31' 36.7"	101° 49' 52.1"	2	2	38	1988
16	Dedi Heriyanto	KUD Tani Rukun	0° 31' 36.7"	101° 49' 52.1"	2	2	38	1988
17	Kurnia (Jaka)	KUD Tani Rukun	0° 31' 36.7"	101° 49' 52.1"	2	2	38	1988
18	Arhedy Abas	KUD Tani Rukun	0° 31' 36.7"	101° 49' 52.1"	2	2	38	1988
19	Trisno Wibowo	KUD Tani Rukun	0° 31' 36.7"	101° 49' 52.1"	2	2	38	1991
20	Sumarjo	KUD Tani Rukun	0° 31' 36.7"	101° 49' 52.1"	2	2	38	1991
21	Masudi	KUD Tani Rukun	0° 31' 36.7"	101° 49' 52.1"	2	2	39	1991
22	Yosar	KUD Tani Rukun	0° 31' 36.7"	101° 49' 52.1"	2	2	39	1991
23	Warso	KUD Tani Rukun	0° 31' 36.7"	101° 49' 52.1"	2	2	39	1991
24	Agus	KUD Tani Rukun	0° 31' 36.7"	101° 49' 52.1"	2	2	39	1991
25	Warso	KUD Tani Rukun	0° 31' 36.7"	101° 49' 52.1"	2	2	39	1991
26	Mukrim	KUD Tani Rukun	0° 31' 36.7"	101° 49' 52.1"	2	2	39	1991
27	Sukirman	KUD Tani Rukun	0° 31' 36.7"	101° 49' 52.1"	2	2	39	1991
27	Sabarudin	KUD Tani Rukun	0° 31' 36.7"	101° 49' 52.1"	2	2	39	1991
28	Tukimin	KUD Tani Rukun	0° 31' 36.7"	101° 49' 52.1"	2	2	39	1991
29	Amri	KUD Tani Rukun	0° 31' 36.7"	101° 49' 52.1"	2	2	39	1991
30	Dimas Bayu Aji	KUD Tani Rukun	0° 31' 36.7"	101° 49' 52.1"	2	2	39	1991
31	Dwi Asmara	KUD Tani Rukun	0° 31' 36.7"	101° 49' 52.1"	2	2	39	1991
32	Dede Supendi	KUD Mitra Usaha	0° 31' 36.7"	101° 49' 52.1"	2	2	39	1991
33	Hadi	KUD Mitra USaha	0° 31' 36.7"	101° 49' 52.1"	2	2	39	1991
34	Bambang Pairan	KUD Mitra Usaha	0° 31' 36.7"	101° 49' 52.1"	2	2	39	1990
35	Ponimin	KUD Mitra Usaha	0° 31' 36.7"	101° 49' 52.1"	2	2	39	1990
36	Muhrodin	KUD Mitra Usaha	0° 31' 36.7"	101° 49' 52.1"	2	2	39	1990
37	Carum	KUD Mitra Usaha	0° 31' 36.7"	101° 49' 52.1"	2	2	39	1990
36	J. Marbun / SOKip	KUD Mitra Usaha	0° 31' 36.7"	101° 49' 52.1"	2	2	39	1990

No	Name of farmer	Location	GPS Reference		Area Summary (Ha)		Forecasted annual FFB Production (MT)	Date of joining
			Latitude (N)	Longitude (E)	Total Certified Area	Planted Area		
37	Sornan	KUD Mitra Usaha	0° 31' 36.7"	101° 49' 52.1"	2	2	39	1990
38	Suharnof	KUD Mitra Usaha	0° 31' 36.7"	101° 49' 52.1"	2	2	39	1990
39	Dedi	KUD Mitra Usaha	0° 31' 36.7"	101° 49' 52.1"	2	2	39	1990
40	Misren	KUD Mitra Usaha	0° 31' 36.7"	101° 49' 52.1"	2	2	39	1990
41	Bowo	KUD Mitra Usaha	0° 31' 36.7"	101° 49' 52.1"	2	2	42	1990
42	M. Rosyad	KUD Mitra Usaha	0° 31' 36.7"	101° 49' 52.1"	2	2	42	1990
43	Mukhlas	KUD Mitra Usaha	0° 31' 36.7"	101° 49' 52.1"	2	2	42	1990
44	Sabarun	KUD Mitra Usaha	0° 31' 36.7"	101° 49' 52.1"	2	2	42	1990
45	Misrun	KUD Mitra Usaha	0° 31' 36.7"	101° 49' 52.1"	2	2	42	1990
46	Ngadino	KUD Mitra Usaha	0° 31' 36.7"	101° 49' 52.1"	2	2	42	1990
47	Rudi	KUD Makarti Sawit	0° 31' 36.7"	101° 49' 52.1"	2	2	42	1992
48	Rizal	KUD Makarti Sawit	0° 31' 24.6"	101° 49' 52.2"	2	2	42	1992
49	Saragih	KUD Makarti Sawit	0° 31' 24.6"	101° 49' 52.2"	2	2	42	1992
50	Edy Susanto	KUD Makarti Sawit	0° 31' 24.6"	101° 49' 52.2"	2	2	42	1992
51	Setiyadi	KUD Makarti Sawit	0° 31' 24.6"	101° 49' 52.2"	2	2	39	1992
52	Yoyo	KUD Makarti Sawit	0° 31' 24.6"	101° 49' 52.2"	2	2	39	1992
53	Sukardi/Yanto	KUD Makarti Sawit	0° 36' 56.8"	101° 52' 23.2"	2	2	39	1992
54	Tono	KUD Makarti Sawit	0° 36' 56.8"	101° 52' 23.2"	2	2	39	1992
55	Rahmat	KUD Makarti Sawit	0° 36' 56.8"	101° 52' 23.2"	2	2	39	1992
56	Mamat	KUD Makarti Sawit	0° 36' 56.8"	101° 52' 23.2"	2	2	39	1992
57	Rahman	KUD Makarti Sawit	0° 36' 56.8"	101° 52' 23.2"	2	2	39	1992
58	Herbi	KUD Makarti Sawit	0° 36' 56.8"	101° 52' 23.2"	2	2	39	1992
59	Sunar	KUD Makarti Sawit	0° 36' 49.0"	101° 52' 29.2"	2	2	39	1992
60	Hadiono	KUD Makarti Sawit	0° 36' 49.0"	101° 52' 29.2"	2	2	39	1992

Appendix F: List of Abbreviations

a.i	Active Ingredient
BOD	Biochemical Oxygen Demand
CB	Certification Bodies
CHRA	Chemical Health Risk Assessment
COD	Chemical Oxygen Demand
CPO	Crude Palm Oil
CSPO	Certified Sustainable Palm Oil
CSPKO	Certified Sustainable Palm Kernel Oil
EFB	Empty Fruit Bunch
EHS	Environmental, Health and Safety
EIA	Environmental Impact Assessment
EMS	Environmental Management System
FFB	Fresh Fruit Bunch
FPIC	Free, Prior, Informed and Consent
GAP	Good Agricultural Practice
GHG	Greenhouse Gas
GMP	Good Manufacturing Practice
GPS	Global Positioning System
HCV	High Conservation Value
IPM	Integrated Pest Management
IP	Identity Preserved
IS - CSPO	Independent Smallholder Certified Sustainable Palm Oil
IS – CSPKO	Independent Smallholder Certified Sustainable Palm Kernel Oil
IS – CSPKE	Independent Smallholder Certified Sustainable Palm Kernel Expeller
ISCC	International Sustainable Carbon Certification
ISS	Independent Smallholder Standard
LD50	Lethal Dose for 50 sample
MB	Mass Balance
MSDS	Material Safety Data Sheet
MT	Metric Tonnes
OER	Oil Extraction Rate
OSH	Occupational Safety and Health
PK	Palm Kernel
PKO	Palm Kernel Oil
POM	Palm Oil Mill
POME	Palm Oil Mill Effluent
PPE	Personal Protective Equipment
RSPO	Roundtable on Sustainable Palm Oil
P&C	Principles & Criteria
RTE	Rare, Threatened or Endangered species
SCCS	Supply Chain Certification Standard
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure