

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

- Initial Assessment**
- Annual Surveillance Assessment (ASA1_3 & 1_4)**
- Recertification Assessment** (Choose an item.)
- Extension of Scope**

<p>Client Company name (Parent Company): PT Inti Indosawit Subur</p>
<p>Client company Address: JI. MH. Thamrin No. 31, Jakarta 10230, Indonesia</p>
<p>Certification Unit: PT Inti Indosawit Subur – Tungkal Ulu POM</p> <p>Location of Certification Unit: Merlung Village, Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia</p>
<p>Date of Final Report: 24/03/2022</p>

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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 MH Thamrin No 31 Jakarta 10230 Indonesia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Tungkal Ulu Palm Oil Mill		
Location / Address	Merlung Village, Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia		
Website	www.asianagri.com		
Management Representative	Ivan Novrizaldie	E-mail	Ivan_novrizaldie@asianagri.com
Telephone	+62 21 2301119	Facsimile	+62 21 2301120

2. Certification Information			
Certificate Number	RSPO 594422	Certificate Start Date	15/08/2017
Date of First Certification	15/08/2012	Certificate Expiry Date	14/08/2022
Scope of Certification	Production of Palm Oil and Palm Kernel		
Visit Objectives	<p>Determination of the conformity of the client's management system, or parts of it, with audit criteria and evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements.</p> <p>The audit is a combined ASA1_3 & ASA1_4 with increased 50% in sampling.</p>		
Assessment Cycle	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 1_3) <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	60 MT FFB/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 14001:2004	SGS	10 June 2023
EU-ISCC-Cert-DE100-01641121	ISCC EU	SGS	6 September 2022
SGS-ID-ISPO-0032	ISPO	SGS	20 March 2024

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Tungkal Ulu POM	Merlung Village, Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01° 18' 01.00" S	102° 58' 53.00" E
Tungkal Ulu Estate	Merlung Village, Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01° 17' 18.00" S	102° 56' 54.00" E
KUD Bina Usaha	Cinta Damai Village (SP-1), Renah Mendaluh District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°20' 23.50" S	102°55' 03.90" E
KUD Sawit Kita	Lampisi Village (SP-2), Renah Mendaluh District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°19' 01.50" S	102°56' 58.90" E
KUD Karya Kita	Tanjung Benanak Village (SP-3), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°20' 40.10" S	102°58' 16.30" E
KUD Karya Jaya	Bukit Harapan Village (SP-4), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°20' 34.00" S	102°00' 35.40" E
KUD Panca Mukti	Pinang Gading Village (SP-5), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°19' 09.80" S	103°04' 01.10" E
KUD Sari Bumi	Adipurwa Village (SP-6), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°21' 50.40" S	103°02' 39.30" E
Koperasi Manunggal Jaya	Adipurwa Village (SP-6), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°21' 45.00" S	103°01' 38.10" E
KUD Sawit Mulia	Intan Jaya Village (SP-7), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°20' 36.00" S	103°05' 38.90" E
KUD Argo Makmur	Bukit Indah Village (SP-8), Muara Papalik District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°19' 16.90" S	103°07' 40.60" E

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KUD Harapan Jaya	Kemang Manis Village (SP-9), Muara Papalik District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°19' 15.9" S	103°10' 05.00" E
Notes:			

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	
Tungkal Ulu Estate	4,323	128.32	104,68	4,556	94.89	
KUD Bina Usaha (450 smallholders)	910	-	-	910	100	
KUD Sawit Kita (508 smallholders)	1,028		-	1,028	100	
KUD Karya Kita (579 smallholders)	1,168		-	1,168	100	
KUD Karya Jaya (399 smallholders)	810		-	810	100	
KUD Panca Mukti (384 smallholders)	792		-	792	100	
KUD Sari Bumi (377 smallholders)	764		-	764	100	
Koperasi Manunggal Jaya (104 smallholders)	208		-	208	100	
KUD Sawit Mulia (676 smallholders)	1,362		-	1,362	100	
KUD Argo Makmur (560 smallholders)	1,130		-	1,130	100	
KUD Harapan Jaya (560 smallholders)	1,130		-	1,130	100	
Total	13,625		128.32	104,68	13,858	98.32

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6. Plantings & Cycle							
Estate / Smallholders	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Tungkal Ulu Estate	1,889	877	50	-	1,507	2,434	1,889
KUD Bina Usaha (450 smallholders)	-	-	-	-	910	910	-
KUD Sawit Kita (508 smallholders)	-	-	-	-	1,028	1,028	-
KUD Karya Kita (579 smallholders)	-	-	-	-	1,168	1,168	-
KUD Karya Jaya (399 smallholders)	-	-	-	-	810	810	-
KUD Panca Mukti (384 smallholders)	-	-	-	-	792	792	-
KUD Sari Bumi (377 smallholders)	-	-	-	-	764	764	-
Koperasi Manunggal Jaya (104 smallholders)	-	-	-	-	208	208	-
KUD Sawit Mulia (676 smallholders)	-	-	-	-	1,362	1,362	-
KUD Argo Makmur (560 smallholders)	-	-	-	-	1,130	1,130	-
KUD Harapan Jaya (560 smallholders)	-	-	-	-	1,130	1,130	-
Total (ha)	1,889	877	50	-	10,809	11,736	1,889

Note: -

7. Summary of Certified Tonnage of FFB (Own Certified Scope)				
Estate / Smallholders	Tonnage / year			
	Estimated last year (mt) (Aug 2019 – Jan 2022)	Actual (mt) (May 2019 – Aug 2021)		Forecast (mt) (Sept 2021 – Jul 2022)
		Previous license period (May – Jul 2019)	Current license period (Aug 2019 – Aug 2021)	
Tungkal Ulu Estate	79,898	9,310.97	70,474.54	70,778
KUD Bina Usaha	15,070	10,840.39	82,050.65	6,496

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(450 smallholders)				
KUD Sawit Kita (508 smallholders)	10,242			4,672
KUD Karya Kita (579 smallholders)	16,744			15,482
KUD Karya Jaya (399 smallholders)	14,995			1,182
KUD Panca Mukti (384 smallholders)	16,000			2,365
KUD Sari Bumi (377 smallholders)	15,628			2,350
Koperasi Manunggal Jaya (104 smallholders)	4,044			468
KUD Sawit Mulia (676 smallholders)	100			100
KUD Argo Makmur (560 smallholders)	100			100
KUD Harapan Jaya (560 smallholders)	100			100
Total	172,920		172,676.55	104,093

Note:

Volume extended

FFB extended – 25,200 MT (total FFB after extension = 172,920 MT)

8. Summary of Certified Tonnage of FFB (from other certified unit(s))

Estate / Smallholders	Tonnage / year			
	Estimated last year (Aug 2019 – Jan 2022)	Actual (May 2019 – Aug 2021)		Forecast (Sept 2021 – Jul 2022)
		Previous license period (May – Jul 2019)	Current license period (Aug 2019 – Aug 2021)	
Total				

Note: -

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9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage / year			
	Estimated last year (Aug 2019 – Jan 2022)	Actual (May 2019 – Aug 2021)		Forecast (Sept 2021 – Jul 2022)
		Previous license period (May – Jul 2019)	Current license period (Aug 2019 – Aug 2021)	
3 rd Party		30,265.66 mt	375,832.04 mt	
Total		406,097.69 mt		
Note: -				

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	May 2019	6,273.05	8,355.70	14,628.75
2	June 2019	6,509.39	9,066.20	15,575.59
3	July 2019	7,368.92	12,843.76	20,212.68
4	August 2019	8,521.40	13,424.96	21,946.35
5	September 2019	9,373.71	16,500.03	25,873.73
6	October 2019	9,768.32	17,650.02	27,418.34
7	November 2019	8,088.22	14,969.37	23,057.59
8	December 2019	6,331.69	13,731.39	20,063.08
9	January 2020	5,331.21	13,188.96	18,520.17
10	February 2020	4,954.84	10,724.06	15,678.90
11	March 2020	4,980.30	10,189.22	15,169.52
12	April 2020	5,479.18	10,352.38	15,831.56
13	May 2020	5,306.99	8,712.11	14,019.10
14	June 2020	5,764.70	9,620.27	15,384.96
15	July 2020	4,887.49	7,480.43	12,367.92
16	August 2020	5,338.70	11,106.65	16,445.35
17	September 2020	6,881.01	14,382.43	21,263.43
18	October 2020	8,304.71	17,023.03	25,327.74
19	November 2020	7,888.11	15,072.54	22,960.65
20	December 2020	7,024.72	15,939.26	22,963.98

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21	January 2021	5,865.02	14,640.42	20,505.45
22	February 2021	3,480.20	12,559.88	16,040.08
23	March 2021	5,043.69	14,130.85	19,174.54
24	April 2021	4,669.63	16,156.05	20,825.68
25	May 2021	4,204.10	14,655.25	18,859.35
26	June 2021	5,548.65	12,926.49	18,475.14
27	July 2021	4,959.78	12,444.02	17,403.81
28	Aug 2021	4,528.83	12,161.67	16,690.50
TOTAL		172,676.55	360,007.40	532,683.94

Note: -

10. Summary of Certified Tonnage (not applicable for ISS)

Estimated last year (Aug 2019 – Jan 2022)	Actual (May 2019 – Aug 2021)		Forecast (Sept 2021 – Jul 2022)
	Previous license period (May – Jul 2019)	Current license period (Aug 2019 – Aug 2021)	
FFB	FFB		FFB
172,920 mt	20,151.36 mt	152,525.19 mt	104,093 mt
	172,676.55		
CPO (OER: 22.36%)	CPO (OER: 22.38%)		CPO (OER: 21.93%)
38,660 mt	4,530.02 mt	34,116.06 mt	22,823 mt
	38,646.08		
PK (KER: 5.69%)	PK (KER: 5.5%)		PK (KER: 5.25%)
9,672 mt	1,108.32 mt	8,388.89 mt	5,465 mt
	9,497.21 mt		

Note:

Volume extended

FFB extended – 25,200 MT (total FFB after extension = 172,920 MT)

CPO extended – 2,600 MT (total CPO after extension = 38,660 MT)

PK extended – 1,400 MT (total PK after extension = 9,672 MT)

The actual FFB, CPO and PK production is under estimated plus extended volume.

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10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1	May 2019	1,410.18	345.02
2	June 2019	1,463.31	358.02
3	July 2019	1,656.53	405.29
4	August 2019	1,874.71	468.68
5	September 2019	2,062.22	515.55
6	October 2019	2,149.03	537.26
7	November 2019	1,779.41	444.85
8	December 2019	1,423.36	348.24
9	January 2020	1,198.46	293.22
10	February 2020	1,113.85	272.52
11	March 2020	1,119.57	273.92
12	April 2020	1,231.72	301.35
13	May 2020	1,193.01	291.88
14	June 2020	1,295.90	317.06
15	July 2020	1,098.71	268.81
16	August 2020	1,200.14	293.63
17	September 2020	1,546.85	378.46
18	October 2020	1,866.90	456.76
19	November 2020	1,773.25	433.85
20	December 2020	1,579.16	386.36
21	January 2021	1,318.46	322.58
22	February 2021	782.35	191.41
23	March 2021	1,133.82	277.40
24	April 2021	1,049.73	256.83
25	May 2021	945.08	231.23
26	June 2021	1,247.34	305.18
27	July 2021	1,114.96	272.79
28	Aug 2021	1,018.08	249.09
TOTAL		38,646.08	9,497.21
Note:			

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11. Summary of Actual Volume sold					
Current License period (Aug 2019 – Aug 2021)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	3,076.64	30,949.83	0	0	34,026.47
PK (MT)	8,064.48	0	0	0	8,064.48
Credits	-	-	-	-	-
Previous License period (May – July 2019)					
CPO (MT)	326.38	2,547.87	0	0	2,874.25
PK (MT)	1,103.39	0	0	0	1,103.39
Credits	-	-	-	-	-

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	Buyer A	-	-	9,167.87
2	Buyer B	-	3,403.02	-
TOTAL			3,403.02	9,167.87

Note: -

11B. Records of CPO & PK Sold under other schemes since the last audit (if any)				
No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
1	Buyer C	ISCC	33,497.7	-
TOTAL			33,497.7	-

Note:

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

Note:

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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 (mt)
	NIL		
TOTAL			
Note:			

12. Independent Smallholders Certified Tonnage / Volume									
Phase	Estimated last year (key in period)			Actual (key in period)			Forecast (key in period)		
	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			N/A			N/A			N/A
IS-CSPO	N/A	N/A		N/A	N/A		N/A	N/A	
IS-CSPKO	N/A	N/A		N/A	N/A		N/A	N/A	
IS-CSPKE	N/A	N/A		N/A	N/A		N/A	N/A	

13. Independent Smallholders Actual Sold Tonnage / Volume						
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	IS-CSPK	IS-CSPKE
Current License period (key in period)						
Credits				N/A	N/A	N/A
Physical	N/A	N/A	N/A			

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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Representative: Nicholas Cheong (Nicholas.Cheong@bsigroup.com)
Website: www.bsigroup.com

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 **9 – 18 September 2021**. The audit programme is included as Section 2.3. Due to the COVID-19 pandemic, this assessment involved a partial remote audit as allowed by RSPO Secretariat – RSPO P&C On-site & Remote Audits dated 24th March 2020. The remote audit was conducted on **6 – 8 July 2020**. The audit is a combined ASA1_3 & ASA1_4 with increased 50% in sampling.

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 Critical NC close out on-site assessment was conducted on **29 November 2021**. The audit programs are included in Section 2.3.

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

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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.

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 (Recertification)	Year 2 (ASA 1_1)	Year 3 (ASA 1_2)	Year 4 (ASA 1_3)	Year 5 (ASA 1_4)
Tungkal Ulu POM	√	√	√	√	√
Tungkal Ulu Estate	√	√	√	√	√
KUD Bina Usaha	√		√		
KUD Sawit Kita		√		√	
KUD Karya Kita		√			√
KUD Karya Jaya	√			√	
KUD Panca Mukti		√			√
KUD Sari Bumi		√		√	
Koperasi Manunggal Jaya			√		
KUD Sawit Mulia	√			√	
KUD Argo Makmur			√		√
KUD Harapan Jaya			√		√

Tentative Date of Next Visit: May 2, 2022 - May 6, 2022

Total Number of Mandays: 29

2.2 BSI Assessment Team

Name	Role	Competency
Andi Pratama Pasaribu (AP)	Team Leader	<p>Education: Holds a Bachelor Degree of Agriculture from Jember University, majoring in Social Economy</p> <p>Work Experience: Has several of work experiences (more than 5 years) as the operational staff since 2008 - 2013</p> <p>Training attended: Has been attended and completed Indonesian Sustainable Palm Oil (ISPO) Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, ISO 14001 Lead Auditor Course, ISO 9001 Lead Auditor Course, ISO 45001 Lead Auditor Course, Endorsed RSPO Supply Chain Certification Lead Auditor Course, SMETA requirements training and High Conservation Value and GIS Awareness training. He has some experiences of Sustainability Palm Oil scheme audit in Indonesian and Malaysia in best management practices, land legality, environmental, social and worker welfare aspect and supply chain.</p> <p>Aspect covered in this audit: During this assessment, he assessed legal, social and best management practices aspect</p> <p>Language proficiency: Fluent in English and Bahasa.</p>
Mujinius Jalaraya (MJ)	Team Member	<p>Education: Holds Bachelor degree from Faculty of Forestry, Bogor Agricultural University (IPB) in 2008, Majoring in Forest Resources Conservation and Ecotourism.</p> <p>Work Experience: Has working experience in palm oil plantations as SHE Assistant at PT. Astra Agro Lestari Tbk in 2008 - 2012 and as Supervisor Sustainability at Teladan Prima Group in 2012 – 2014.</p> <p>Training attended: Has involved in RSPO certification since 2014 as a team member subsequently as a Lead Auditor. He has completed the training, such as: Lead Auditor ISO 9001: 2008 course, Lead Auditor ISPO course, Lead Auditor RSPO endorsed course, RSPO SCCS Lead Auditor endorsed course, HCV Identification and management, Internal Auditor ISO 14001: 2004 Training, Training for Trainers, OHS Expert Training, etc.</p> <p>Aspect covered in this audit: During this assessment, he assessed on health and safety, environment, supply chain and ICS.</p> <p>Language proficiency: Fluent in English and Bahasa Indonesia.</p>
Imam Fakhurozi (IF)	Team Member	<p>Education: Holds degree in Agriculture Technology and graduated from Gadjah Mada University, Yogyakarta on 2011.</p>

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		<p>Work Experience: He had 2 (two) years working experience related to oil palm industry, as a sustainability and HSE officer in oil palm Plantation Company in Indonesia.</p> <p>Training attended: Imam has completed a number of relevant trainings, the training includes ISO 9001:2008 and EMS 14001:2004 Lead Auditor, Lead Auditor of SMK3, RSPO P&C Lead auditor endorsed course.</p> <p>Aspect covered in this audit: During this assessment, he assessed on environment, occupational, safety and health aspects.</p> <p>Language proficiency: Fluent in English and Bahasa.</p>
<p>Nanang Rusmana (NR)</p>	<p>Team Member</p>	<p>Education: Holds bachelor's degree of Forestry from IPB University..</p> <p>Work Experience: Has 8 years working experiences in oil palm plantation and mining sector in Indonesia. He has involved in a number of RSPO and ISPO audits in Indonesia.</p> <p>Training attended: Has completed training on ISO 9001, ISO 14001, SMK3, ISO 45001, SMETA, Lead Auditor RSPO endorsed course, RSPO SCCS Lead Auditor endorsed course and ISPO Lead Auditor Course.</p> <p>Aspect covered in this audit: During this assessment, he assessed on social and worker welfare. He also conducted public consultation with internal stakeholders.</p> <p>Language proficiency: Fluent in English and Bahasa Indonesia.</p>
<p>Nanang Kualib (NM)</p>	<p>Team Member</p>	<p>Education: Holds Bachelor of Forestry Science, Forest Technology Department in Bogor Agriculture Institute.</p> <p>Work Experience: Has been worked in Forest Company in 2000 – 2004 as a technical assistant of Sustainable Forest Management Implementation, Joint program with Forest Faculty Bogor Agriculture Institute and WWF Indonesia in 2006 – 2010. As a professional, he was involved in HCV social study of Sustainable Forest Management, HCV Identification in 3 palm oil plantation in Indonesia.</p> <p>Training attended: Has been attended several training related to sustainability such as RSPO Lead Auditor Training by CheckMark, ISPO Lead Auditor Training, Forest Stewardship Council Lead Auditor Training etc.</p> <p>Aspect covered in this audit: During this assessment, he assessed on social and conservation aspect. He also conducted public consultation with external stakeholders.</p> <p>Language proficiency: Fluent in English and Bahasa Indonesia.</p>

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Accompanying Persons: NIL

2.3 Assessment Plan

The Assessment plan was sent to the client prior to the assessment (attached assessment plan).

Date	Time	Subjects	AP	MJ	IF	NR	NM
Thursday, 09/09/2021	08.00 – 08.30	Opening Meeting <ul style="list-style-type: none"> Presentation by PT. IIS – Tungkal Ulu POM & Tungkal Ulu and Smallholder Presentation by BSI Indonesia 	√	√	√	√	√
	08.30 – 12.00	Document Review for Tungkal Ulu POM & Estate	√	√	√	√	√
	12.00 – 14.00	Break	√	√	√	√	√
	14.00 – 17.00	Document review continuation	√	√	√	√	√
Friday, 10/09/2021	08.00 – 12.00	Document Review for Tungkal Ulu POM & Estate	√	√	√	√	√
	12.00 – 14.00	Break	√	√	√	√	√
	14.00 – 17.00	Document review continuation	√	√	√	√	√
Saturday, 11/09/2021	08.00 – 12.00	Document Review for Tungkal Ulu POM & Estate	√	√	√	√	√
	Half Day Audit						
Sunday, 12/09/2021 Day off							
Monday, 13/09/2021	08.00 – 12.00	Field Visit to Tungkal Ulu Estate: <ul style="list-style-type: none"> - 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. 	√	√	√	√	
	08.00 – 12.00	Public Consultation to external stakeholder: <ul style="list-style-type: none"> Environment agency of Tanjung Jabung Barat Regency Labour agency of Tanjung Jabung Barat Regency Plantation Agency of Tanjung Jabung Barat Regency National Land Agency of Tanjung Jabung Barat Regency National NGO's → WALHI Jambi 					√
	12.00 – 14.00	Break	√	√	√	√	√
	14.00 – 17.00	Document Review for Tungkal Ulu POM & Estate	√	√	√		√
	14.00 – 17.00	Interview workers with: Local Government, NGO and other third parties, previous landowners (if any)				√	√

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Tuesday, 14/09/2021	08.00 – 12.00	Field Visit to Tungkal Ulu POM: <ul style="list-style-type: none"> • Inspection of processing, warehouse, workshop, mill waste management, Effluent Ponds, OHS, Environment issues, POME application, workers interview, Supply chain for CPO mill, Review on SEIA documents and records, Document review, etc. • Audit Supply Chain for CPO Mills (RSPO SCCS) • Interview workers with: Labour Union and Gender Committee. 	√		√		√
	12.00 – 14.00	Break	√	√	√	√	√
	14.00 – 17.00	Document Review for Tungkal Ulu POM & Estate	√	√	√	√	√
Wednesday, 15/09/2021	08.00 – 12.00	Field Visit to Scheme Smallholder: KUD Sawit Kita and KUD Karya Jaya <ul style="list-style-type: none"> - 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. 	√	√	√	√	√
	12.00 – 14.00	Break	√	√	√	√	√
	14.00 – 17.00	Field Visit to Scheme Smallholder: KUD Sari Bumi <p>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.</p>	√	√	√	√	√
Thursday, 16/09/2021	08.00 – 12.00	Field Visit to Scheme Smallholder: KUD Sawit Mulia and KUD Karya Kita <p>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.</p>	√	√	√	√	√
	12.00 – 14.00	Break	√	√	√	√	√
	14.00 – 17.00	Field Visit to Scheme Smallholder: KUD Panca Mukti <p>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.</p>	√	√	√	√	√
Friday, 17/09/2021	08.00 – 12.00	Document Review for Smallholders	√	√	√		√
	12.00 – 14.00	Break	√	√	√	√	√
	14.00 – 17.00	Document Review for Smallholders	√	√	√	√	√
Saturday, 18/09/2021	08.00 – 10.00	Closing Meeting	√	√	√	√	√
	12.00 – 13.30	Flight to Jakarta	√	√	√	√	√

NCR Close Out Assessment Plan

Date	Time	Subjects	Auditor
Mon, 29/11/2021	08.00 - 08.30	Opening meeting <ul style="list-style-type: none"> Auditee Speech (Introduction of PIC, Profile of Certified Management Unit) Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Transparency and Confidentiality Clarification) 	AP
	08.30 – 09.30	NCR Verification	√
	10.00 – 10.30	Closing Meeting	√

*Note: due to covid19 pandemic issue, the auditor team conducted the NCR Close Out remotely to reduce risk.

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?	According to the latest TBP, there is remaining mill and estate that has not certified yet which is PT Mitra Unggul Pusaka – Segati Mill and Penarikan Mill and its supply bases. However, according to the public notification seen in RSPO website, both PT Mitra Unggul Pusaka - Segati and Penarikan Mill has been audited by TUV Rheinland Indonesia on 29 November – 4 December 2021. The other uncertified unit (PT Gunung Melayu – Sentral Estate and PT Nusa Pusaka Kencana – Bahilang Estate) subject to RaCP liability.	Complied

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	<p>The company’s sustainability team has conducted latest RSPO internal audit on October 2021.</p> <ul style="list-style-type: none"> • PT Mitra Unggul Pusaka - Segati Palm Oil Mill and Penarikan Mill located in Pelalawan, Riau will planned Re-Audit in year 2022. Status of disclosure PT MUP has been submitted to RSPO by email on 29 November 2017. The latest respond from RSPO received on 23 April 2019 by Biodiversity Manager, stating that RSPO is on review of Annex 3a and all supporting documents. According to the RSPO Public Notification (https://rspo.org/uploads/default/pnc/Public_Announcement_RSPO - ENGLISH Mitra Unggul (Rev 2).pdf), both PT Mitra Unggul Pusaka - Segati and Penarikan Mill has been audited by TUC Rheinland Indonesia on 29 November – 4 December 2021. • PT. Gunung Melayu – Sentral Estate: Based on the last correspondence from RSPO Secretariat on January 13, 2022 stated that The RSPO has been received the 2nd clarification data of LUCA review for PT Gunung Melayu - Sentral Estate and will be proceed. <i>No additional information until this audit.</i> • PT. Nusa Pusaka Kencana – Bahilang Estate: Based on the last correspondence from RSPO Secretariat on September 29, 2021 stated that The LUCA review for PT Nusa Pusaka Kencana has been “Pass” and moving forward to preparing and submitted the remediation plan. According to the email, summary of key finding stated: <ul style="list-style-type: none"> ➢ FCL – 0 Ha ➢ Environmental remediation – 18.98 Ha (riparian) • Based on the last correspondence from RSPO Secretariat on January 13, 2022 stated that The RSPO has been received the LUCA document of PT Nusa Pusaka Kencana - Bahilang Estate and will be proceed. The certification process scheduled 2022 once the RaCP process approved by RSPO 	
<p>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.</p>	<p>No, there is no new acquisition conducted by PT Inti Indosawit Subur and its subsidiary.</p>	<p>Complied</p>

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<p>Any deviations from the maximum periods requires approval by the RSPO Secretariat.</p>	<p>Yes, there is time bound plan revision dated 1 January 2019, signed by Management Representative. Justification available, it caused by status of disclosure PT MUP is in progress of review by RSPO. PT MUP will conduct re-audit in 2022.</p>	<p>Complied</p>
<p>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?</p>	<p>Yes, there is time bound plan revision dated 1 January 2019, signed by Management Representative. Justification available, it caused by status of disclosure PT MUP is in progress of review by RSPO. PT MUP will conduct re-audit in 2022.</p>	<p>Complied</p>
<p>Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised</p>	<p>No, Based on internal audit there is no isolated lapse in implementation of the plan.</p>	<p>Complied</p>
<p>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</p>	<p>There is no fundamental failure. Unit management can show the evidence of certification progress such as correspondency of RaCP with RSPO Secretariat. The status as follows:</p> <ul style="list-style-type: none"> • PT Mitra Unggul Pusaka – Segati Mill and Penarikan Mill has been re-audited by TUV Rheinland Indonesia on 29 November – 4 December 2021. • PT. Gunung Melayu – Sentral Estate: Based on the last correspondence from RSPO Secretariat on January 13, 2022 stated that The RSPO has been received the 2nd clarification data of LUCA review. • PT. Nusa Pusaka Kencana – Bahilang Estate: Based on the last correspondence from RSPO Secretariat on September 29, 2021 stated that The LUCA review for PT Nusa Pusaka Kencana has been “Pass” and moving forward to preparing and submitted the remediation plan. • Based on the last correspondence from RSPO Secretariat on January 13, 2022 stated that The RSPO has been received the LUCA document of PT Nusa Pusaka Kencana - Bahilang Estate and will be proceed. The certification process scheduled 2022 once the RaCP process approved by RSPO. 	<p>Complied</p>
<p>Un-Certified Units or Holdings</p>		
<p>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.</p>	<p>Based on Time Bound Plan revised 1 January 2019, PT Mitra Unggul Pusaka – Segati Mill and Penarikan Mill located in Pelalawan, Riau Province has been re-audit on December 2021 by TUV Rheinland Indonesia. Status of RaCP and relevant issues are still in progress and waiting for RSPO feedback. Company revised the Timeboundplan on June 2021 and the plan for certification is change due to RaCP still under</p>	<p>Complied</p>

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	<p>process. 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 17 February 2022, confirmed that RSPO has received feedback from the Compensation Panel on the Concept Note of PT Inti Indosawit Subur – Mitra Unggul Pusaka. The concept note is close to an endorsement, however, there have been a few issues raised with regard to the content of the concept note. Therefore, the company is to address the concerns in the revised concept note.</p>	
<p>Any new plantings since January 1st 2010 shall comply with the RSPO New Plantings Procedure.</p>	<p>PT Mitra Unggul Pusaka – Segati Mill and Penarikan 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>Another progress related to uncertified unit (PT Gunung Melayu – Sentral Estate and PT Nusa Pusaka Kencana – Bahilang Estate) related to progress of RaCP actively communicated with RSPO secretariat. The detail of process as follows:</p> <ul style="list-style-type: none"> • PT. Gunung Melayu – Sentral Estate: Based on the last correspondence from RSPO Secretariat on January 13, 2022 stated that The RSPO has been received the 2nd clarification data of LUCA review. • PT. Nusa Pusaka Kencana – Bahilang Estate: Based on the last correspondence from RSPO Secretariat on September 29, 2021 stated that The LUCA review for PT Nusa Pusaka Kencana has been “Pass” and moving forward to preparing and submitted the remediation plan. • Based on the last correspondence from RSPO Secretariat on January 13, 2022 stated that The RSPO has been received the LUCA document of PT Nusa Pusaka Kencana - Bahilang Estate and will be proceed. The certification process scheduled 2022 once the RaCP process approved by RSPO. <p>Unit management actively demonstrates its commitment to the RaCP process.</p>	<p>Complied</p>
<p>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</p>	<p>According to internal audit result on October 2021, there is no land conflict occur in all uncertified unit PT Mitra Unggul Pusaka – Segati Mill and Penarikan Mill, PT Gunung Melayu – Sentral Estate and PT Nusa Pusaka Kencana – Bahilang Estate. In addition the</p>	<p>Complied</p>

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<p>4.4, 4.5, 4.6, 4.7 and 4.8.</p> <p><i>Note:</i></p> <p><i>The RSPO RaCP tracker shall be checked to confirm for any land conflicts/Liabilities https://www.rspo.org/certification/remediation-and-compensation/racp-tracker. The progress on the Liabilities shall be verified and reported. Please refer to BSI-RSPO Secretariat approval.</i></p>	<p>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), PT Inti Indosawit Subur has:</p> <ul style="list-style-type: none"> • MU's with potential liabilities: 4 unit • LUCA Submitted: 4 units • LUCA review Completed: 3 unit • Concept Note Required: 3 units • Concept Note Submitted: 2 units • Concept Note Approved: - • Compensation Plan Submitted: - • Compensation Plan Endorsed: - • Remediation Plan Required: 4 units • Remediation Plan Submitted: - • Remediation Plan Approved: - <p>Based on the latest correspondence between the unit management and RSPO Secretariat on 17 February 2022 related to Concept Note submission, The RSPO Secretariat stated <i>"The concept note is close to an endorsement. However, the company should address the recommendations on the long-lasting and timeline section in the revised concept note"</i>.</p>	
<p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2</p>	<p>According to internal audit result on October 2021, there is no land conflict occur in all uncertified unit PT Mitra Unggul Pusaka – Segati Mill and Penarikan Mill, PT Gunung Melayu – Sentral Estate and PT Nusa Pusaka Kencana – Bahilang Estate. In addition the company has been certified for ISPO (Indonesian Sustainable Palm Oil) since December 2016.</p>	<p>Complied</p>
<p>Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1</p>	<p>According to internal audit result on October 2021, there is no land conflict occur in all uncertified unit PT Mitra Unggul Pusaka – Segati Mill and Penarikan Mill, PT Gunung Melayu – Sentral Estate and PT Nusa Pusaka Kencana – Bahilang Estate. In addition the company has been certified for ISPO (Indonesian Sustainable Palm Oil) since December 2016.</p>	<p>Complied</p>
<p>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.</p>	<p>According to internal audit result on October 2021, there is no land conflict occur in all uncertified unit PT Mitra Unggul Pusaka – Segati Mill and Penarikan Mill, PT Gunung Melayu – Sentral Estate and PT Nusa Pusaka Kencana – Bahilang Estate. Report of internal audit are available.</p>	<p>Complied</p>

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	Positive assurance: PT Inti Indosawit Subur committed to fulfill all the requirement related to RSPO certification process. PT Inti Indosawit Subur has detailed the correction and corrective action plan and any unresolved issues has been on the right path towards the certification process.	
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 on October 2021, 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 October 2021, the stakeholder consultation including NGO cannot be done due to Pandemic Covid-19 circumstances. The stakeholder consultation will be conducted after the normal situation.	Complied

3.2 Progress of scheme smallholders and/or outgrowers

Progress of scheme smallholders or outgrowers towards compliance with relevant standards		
Requirement	Remarks	Compliance
Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification? 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.	All scheme smallholders associated to PT Inti Indosawit Subur – Tungkal Ulu Palm Oil Mill have been comply with the standard	Complied

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	Delik & Pangkalan Kerinci Village,	Simpang Perak Estate*	Delik & Pangkalan Kerinci Village, Bunut	2010	Certified on 16 September 2010

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Indosawit Subur	Bunut Langgam District, Pelalawan Regency, Riau		Langgam District, Pelalawan Regency, Riau		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 District, Tanjung Jabung Regency, Jambi	Tungkal Ulu Estate	Pulau Pauh / Penyabungan / Merlung Village, Tungkal Ulu District, Tanjung Jabung Regency, Jambi	2012	Certified on 15 August 2012 Re-Certification on August 2017
		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 / Pelayung District, Batang Hari Regency, Jambi	Muara Bulian Estate	Singoan / Bukit Sari / Bulian Jaya Village, Muara Bulian / Pelayung 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 Village, Tungkal Ulu District, Tanjung Jabung Regency, Jambi	Taman Raja, Badang & Bernai Estate*	Lubuk Bernai / Kampung Baru / Pelabuhan Dagang / Pematang Pauh Village, 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	Main Audit in 2014	NPP & RaCP is still in Progress Re-Audit 2022 (Waiting for Concept Note)
		Gondai Estate	Pangkalan Sarik / Baru Village, Langgam / Siak Hulu District, Pelalawan / Kampar Regency, Riau	Re-audit by TUV Rheinland Indonesia on 29 November – 4 December 2021	NPP & RaCP is still in Progress Re-Audit 2022 (Waiting for Concept Note)
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 by TUV Rheinland Indonesia on 29 November – 4 December 2021	Re-audit Certification in December 2021 by TUV Rheinland Indonesia
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* (PT Nusa Pusaka Kencana)	Bahilang Village, Tebing Tinggi District, Serdang Bedagai Regency, North Sumatera	2022	*Bahilang Estate On Process RaCP (Excluded from the certification scope but scheduled to re-audit during Recertification 2022 Tanah Datar Mill – once the RaCP process approved by RSPO)
Aek Nabara Mill – PT Supra Matra Abadi	S1-S3 / Sukadame Village, Bilah Hulu / Kota Pinang District, Labuhan	Aek Nabara Estate	S1-S3 / Sukadame Village, Bilah Hulu / Kota Pinang District, Labuhan	2015	Certified on 6 March 2015

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	Batu Regency, North Sumatra		Batu Regency, North Sumatra		
Teluk Panjie Mill – PT Supra Matra Abadi	Teluk Panjie Village, Kampung Rakyat District, Labuhan Batu Regency, North Sumatra	Teluk Panjie Estate (3,885 Ha)	Teluk Panjie Village, Kampung Rakyat District, Labuhan Batu Regency, North Sumatra	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 Sumatra	Tanjung Selamat	Kampung Padang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	2015	Certified on 26 May 2015
		Pangkalan		Sennah Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	2015
Gunung Melayu I – PT Saudara Sejati Luhur	Rahuning Village, Bandar Pulau District, Asahan Regency, North Sumatra	Pulau Maria Estate	Rahuning Village, Bandar Pulau District, Asahan Regency, North Sumatra	2015	Certified on 7 September 2015
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 (Excluded from the certification scope but scheduled to re-audit during Recertification 2022 Gunung Melayu 2 Mill – once the RaCP process approved by RSPO)

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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)	Aek Korsik Village, Aek Natas District, Labuhan Batu Regency, North Sumatra	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 **3 (three) Critical (remote), 1 (one) Critical (onsite); 0 (zero) Minor nonconformities and 1 (one) Opportunity For Improvement** raised. The **PT Inti Indosawit Subur – Tungkal Ulu 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.

Due to covid19 pandemic issue, the auditor team conducted the NCR Close Out remotely to reduce infected risk. This is aligned with the national government procedure related to Covid19 travel restriction.

Non-conformity			
NCR Ref #	1932214-202007-M1	Date Issued	8 July 2020
Due Date	6 October 2020	Date of nonconformity Closure	7 September 2020
Clause & Category (Critical / Minor)	3.8.6 – Critical		
Statement of Nonconformity:	Internal audit RSPO SCCS has not been conducted during 2020 (January – June), while according to procedure internal audit shall be conducted twice a year.		
Requirement Reference:	RSPO INA-NI 2020 Indicator 3.8.6 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 organisation. 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.		
Objective Evidence:	There is no internal audit SCCS conducted in 2020, according to Procedure Audit Internal Sustainability "AA-SOP-ES-6001-R4 dated 1 October 2017 stated that internal audit shall be conducted twice a year (pre and post audit).		
Corrections:	Revised the AA-SOP-ES-6001-R4 Internal Audit SOP to be once a year.		
Root Cause Analysis:	SOP Internal Audit AA-ES-6001-R4 does not refer to the RSPO Standard and other Management systems which stipulate that Internal Audit is only carried out once a year.		
Corrective Actions:	Revise the Internal Audit SOP if there are changes to the Management Standards, both RSPO and other management systems, regarding the internal audit interval.		

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Assessment Conclusion:	<p>Based on NCR Close Out verification, certificate holder has shown the latest Internal Audit Procedure (AA-SOP-ES-6001- 4) dated 19 August 2020. The latest procedure says the internal audit will conducted annually (clause 4.0). Refer to annual internal audit schedule, Tungkal Ulu will be audited on 14 - 18 September 2020.</p> <p>According to the explanation above, this Major NC's has been closed.</p> <p>ASA1_4 assessment verification:</p> <p>Based on document verification during onsite visit known that the certificate holder has conducted the internal audit RSPO on 14 – 18 September 2020. The auditor team has verified the report which covered the supply chain aspect.</p> <p>During the onsite visit and document verification obtained information that the corrective action plan has running well, monitored and evaluated regularly.</p>
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Non-conformity			
NCR Ref #	1932214-202007-M2	Date Issued	8 July 2020
Due Date	6 October 2020	Date of nonconformity Closure	7 September 2020
Clause & Category (Critical / Minor)	4.1.1 – Critical		
Statement of Nonconformity:	The sample of audit (scheme smallholder KUD Plasma Tungkal Ulu) e.g KUD Sawit Kita, KUD Karya Jaya, KUD Sari Bumi and KUD Sawit Mulia has not been able to prove that the policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD) and evidence of its socialization.		
Requirement Reference:	RSPO INA-NI 4.1.1 (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.		
Objective Evidence:	Based on the document review, scheme smallholder has had Human Rights Policy. However, there is no specific policy regarding to retaliation against Human Rights Defender (HRD).		
Corrections:	Socializing Human Rights Policy and retaliation to board of KUD and revising KUD policies by adding things related to human rights and retaliation.		
Root Cause Analysis:	Board of KUD still not aware of the existence of a policy regarding Human Rights and retaliation because the policy has only been disseminated only to the Plasma Staff level.		
Corrective Actions:	Socializing Human Rights Policy and retaliation board of KUD and revising KUD policies by adding things related to human rights and retaliation.		
Assessment Conclusion:	Based on NCR Close Out verification, certificate holder has shown the latest human right policy of smallholder. Clause No. 13 says, "Respect human rights defenders		

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	<p>without making retaliation or intimidation". The socialization of this policy has been held respectively in each KUD's as follows:</p> <ol style="list-style-type: none"> 1. KUD Karya Jaya on 11 July 2020, attended by 21 participants. 2. KUD Sari Bumi on 11 July 2020, attended by 18 participants. 3. KUD Sawit Kita on 11 July 2020, attended by 25 participants. 4. KUD Karya Jaya on 11 July 2020, attended by 21 participants. <p>Based on this document verification, this NC has been closed.</p> <p>ASA1_4 assessment verification:</p> <p>Based on the interview with smallholder sampled obtained information that they has been aware related to policy to respect human rights. There is no record of human rights violation. Most of the working relationships in smallholder plots are based on kinship or closeness as fellow villagers. Therefore, based on the statement from the head of the KUD, it is certain that there are no violations of human rights in the KUD.</p> <p>During the onsite visit and document verification obtained information that the corrective action plan has running well, monitored and evaluated regularly.</p>
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Non-conformity			
NCR Ref #	1932214-202007-M3	Date Issued	8 July 2020
Due Date	6 October 2020	Date of nonconformity Closure	7 September 2020
Clause & Category (Critical / Minor)	6.6.2 – Critical		
Statement of Nonconformity:	The certificate holder has not been able to show the company's procedures and policies related to temporary workers / PHL (Specific Time Work Agreement / PKWT).		
Requirement Reference:	RSPO INA-NI 2020 Indicator 6.6.2 (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.		
Objective Evidence:	<p>Certificate holder uses peace workers and specified time work agreement workers in plantation and mill operations. Based on the May 2020 list of employees there were 505 workers in the plantation, 29 workers in the Tungkal Ulu factory and 8 workers in the Tungkal Ulu Plasma.</p> <p>The company has a procedure regarding the Acceptance of New Employees SOP No. AA-HR-305.2-R0 dated February 1, 2009 this procedure is a general acceptance of employees (for all employees), but there are no specific procedures and policies regarding peace workers and specified time work agreement workers according to the RSPO P&C requirements.</p>		

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Corrections:	Revised procedures related to HR regarding the implementation of the 2019 RSPO INA NI P&C, especially the mechanism for the recruitment and recruitment of PHL and PKWT workers.
Root Cause Analysis:	Lack of coordination between the Sustainability Department and the HR Department has resulted in procedures related to HR regarding the implementation of the 2019 RSPO INA NI P&C, especially the mechanism for the Acceptance and Appointment of PHL and PKWT workers not yet updated.
Corrective Actions:	Update HR procedures if there are changes to the management system, both RSPO and other management systems.
Assessment Conclusion:	<p>Based on NCR Close Out verification, certificate holder has shown the CAP's evidence as follows:</p> <ol style="list-style-type: none"> 1. Memorandum No. 208/SM-KTU/MEMO/VII/2020 dated 23 July 2020. Those memorandum described the recruitment process of Specified Time Work Agreement Worker/Temporary Worker. Effective since 1st August 2020. Those memorandum attached with recruitment flow chart. 2. Certificate holder has shown the minutes of meeting with workers representatives on 27 July 2020, attended by 50 workers. 3. Certificate holder has shown the workers evaluation schedule year 2020 and 2021. Projection of permanent worker recruitment attached. <p>Based on that evidence, this Major NC's has been closed.</p> <p>ASA1_4 assessment verification:</p> <p>Based on document verification and interview with labour representatives obtain information that the company has appointed the 57 casual workers in to permanent workers during 2021. All the casual workers will be gradually appointed as permanent workers according to the company's plan.</p> <p>During the onsite visit and document verification obtained information that the corrective action plan has running well, monitored and evaluated regularly.</p>

Non-conformity			
NCR Ref #	2107728-202109-M1	Date Issued	18 September 2021
Due Date	17 December 2021	Date of nonconformity Closure	29 November 2021
Clause & Category (Critical / Minor)	6.7.3 – Critical		
Statement of Nonconformity:	Based on field visit sampled, the organization has not been able to demonstrate the consistency of PPE to cover all potentially hazardous operations.		
Requirement Reference:	(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		

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	available, so that workers can change out of PPE, wash and put on their personal clothing.
Objective Evidence:	<p>PT Inti Indosawit Subur – Tungkal Ulu POM has prepared the procedure of PPE - "SOP Alat Pelindung Diri' No: AA-SOP-OP- 101.3. The procedure stated that the company has provided adequate and appropriate protective equipment for all workers at place of works, in line with the risk assessment.</p> <p>During field visit in Tungkal Ulu POM, the auditor team found:</p> <ul style="list-style-type: none"> • In boiler station area - found 2 welders working at height, but workers not wearing safety harness or body harness. • In sortation station - found 2 drivers for FFB transport was not used shoes (they use sandals)
Corrections:	<ul style="list-style-type: none"> • Provide refresher training to workers on the importance of using PPE. • Calling the FFB driver representative through the union to hold a meeting regarding the use of PPE when entering the mill area.
Root Cause Analysis:	<ul style="list-style-type: none"> • Lack of awareness of workers to use PPE in accordance with the types of risks and potential hazards in their respective jobs. • Lack of understanding from FFB transport drivers about the importance of using PPE.
Corrective Actions:	<ul style="list-style-type: none"> • Checking the completeness of the workers' PPE at every briefing/master in the morning by making a checklist for checking the completeness of the workers' PPE. • Ensuring workers who work in altitude areas and other high-risk areas make a Job Safety Analysis first before working and the Job Safety Analysis is signed by the Assistant and Manager. • Hold a meeting with the labor union regarding the necessity of using personal protective equipment (PPE) when entering the mill area/area and installing a signboard at the entrance area of the security post.
Assessment Conclusion:	<p>The company has shown evidence of improvement as follows:</p> <ul style="list-style-type: none"> • Attendance socialization of the use of PPE to all employees during the morning briefing which was attended by all employees, staff and security according to the incoming shift on October 11, 2021. For example, shift 1 was attended by 17 employees. • Monitoring the use of PPE by employees in the document "Personal Protective Equipment Checklist". Shows a checklist of the suitability of PPE used by employees. • Sample Job Safety Analysis for air lock fan repair for unloading delivery on November 28, 2021, which was made by a mechanic and received approval by maintenance assistants, general K3 experts and mill manager. • Sample of warning letter for employees who do not use PPE issued by the maintenance assistant on September 8, 2021 for 2 maintenance employees. <p>Based on the evidence of improvement shown, this noncompliance is closed.</p>

Opportunity for Improvements	
OFI #	Description
OFI 1	The company has decided to follow the process of resolving land conflicts with Tanjung Paku Village which is mediated by the Regional Government of Tanjung Jabung Barat Regency (c.q Badan Kesatuan Bangsa dan Politik). The company can consistently implement every agreement agreed in the process of resolving land conflicts with the Tanjung Paku villagers, including monitoring and properly documenting.

Positive Findings	
PF #	Description
PF 1	-

3.3.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	1761451-201905-M1	Date Issued	24 May 2019
Due Date	23 August 2019	Date of nonconformity Closure	7 August 2019
Clause & Category (Critical / Minor)	1.2.2 – Critical		
Statement of Nonconformity:	The document related to details of complaints and grievances (Criterion 6.3) and continual improvement plans (Criterion 8.1) has not provided in the list of documents that are publicly accessible, which recorded in "Formulir Distribusi Informasi" (Open to Public) updated on 5 July 2018 for PT Inti Indosawit Subur – Tungkal Ulu and January 2019 for Scheme Smallholders.		
Requirement Reference:	1.2.1 Publicly available documents shall include, but are not necessarily limited to: a) Land titles/user rights (Criterion 2.2) b) Occupational health and safety plans (Criterion 4.7) c) Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8) d) HCV documentation (Criteria 5.2 and 7.3) e) Pollution prevention and reduction plans (Criterion 5.6) f) Details of complaints and grievances (Criterion 6.3) g) Negotiation procedures (Criterion 6.4) h) Continual improvement plans (Criterion 8.1) i) Public summary of certification assessment report j) Human Rights Policy (Criterion 6.13).		
Objective Evidence:	The organization has made a list of documents that are publicly accessible, recorded in "Formulir Distribusi Informasi" (Open to Public) updated on 5 July 2018 for PT Inti Indosawit Subur – Tungkal Ulu and January 2019 for Scheme Smallholders.		

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	<p>However, the document related to Details of complaints and grievances (Criterion 6.3) and Continual improvement plans (Criterion 8.1) has not provided at the list of documents</p>
Corrections:	<p>Management PT IIS – Tungkal Ulu has made revision of “Daftar Dokumen dan Informasi Untuk Diakses Publik PT Inti Indosawit Subur” dated 15 July 2019. List of document publicly available (government, NGO, society/community, KUD) among others:</p> <ul style="list-style-type: none"> • Land titles/user rights (HGU, Izin lokasi, Izin prinsip, IPKH) • Occupational health and safety plans (Laporan Pelaksanaan P2K3 dan program K3) • Plans and impact assessments relating to environmental and social impacts (AMDAL and SIA) • HCV documentation (Laporan identifikasi HCV) • Pollution prevention and reduction plans (Program Manajemen Lingkungan) • Details of complaints and grievances (Detail Logbook Keluhan Karyawan dan Pelanggan) • Negotiation procedures (SOP Penanganan Informasi Keluhan, Konflik lahan dll) • Continual improvement plans (Continuous Improvement Program) • Public summary of certification assessment report (Public Summary Report RSPO) • Human Rights Policy (Kebijakan Perusahaan) <p>Sustainability team has deliver the training and awareness to management site on 3 August 2019 regarding minimum requirement of document publicly available according to RSPO P & C indicator 1.2.1. Training record were available and can be demonstrated during verification audit.</p>
Root Cause Analysis:	<p>Humas (Public relation) as a PIC whose made a list of documents that are publicly accessible by stakeholder has not aware the minimum requirement of P & C RSPO indicator 1.2.1; Humas determined the list of document publicly available based on social needs and impact.</p>
Corrective Actions:	<p>Monitoring the compliance of RSPO P & C requirement through internal audit. Internal audit program has been made for 2019 with frequency 2 times a year. In 2019 internal audit performed on May 2019 and August 2019.</p>
Assessment Conclusion:	<p>The corrective action made is sufficient and accepted. This Major NC is closed on 7 August 2019.</p> <p>ASA1_3 assessment verification:</p> <p>During the onsite visit and document verification obtained information that the corrective action plan has running well, monitored and evaluated regularly.</p> <p>Based on the document verification, the information related to the grievance was available for public. For example, grievance from Tanjung Paku Village.</p>

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Non-conformity			
NCR Ref #	1761451-201905-M2	Date Issued	24 May 2019
Due Date	23 August 2019	Date of nonconformity Closure	7 August 2019
Clause & Category (Critical / Minor)	5.1.3 – Critical		
Statement of Nonconformity:	Environmental monitoring was not implemented as per RPL (Rencana Pemantauan Lingkungan) document.		
Requirement Reference:	5.1.3 Environment monitoring plan document, its implementation report, and the corrective plan (if non-conformance arised from the monitoring result) shall be available. This plan is reviewed on two yearly basis.		
Objective Evidence:	<p>PT Inti Indosawit Subur - Tungkal Ulu has Environmental monitoring plan document presented in RPL (Rencana Pemantuan Lingkungan) Document and has been approved through "Keputusan Bupati Tanjung Jabung Barat Nomor 309 Tahun 2009 tentang Persetujuan Analisis Dampak Lingkungan, Rencana Pengelolaan Lingkungan dan Rencana Pemantauan Lingkungan Kegiatan PMKS PT Inti Indosawit Subur di Kecamatan Merlung Kab. Tanjung Jabung Barat" dated 6 July 2009.</p> <p>As per environment monitoring plan stated that company shall be perform soil analysis twice a year, however soil analysis performed once a year.</p> <p>There is no evidence that Soil Analysis conducted twice a year as environment management and monitoring plan directive (matriks RKL-RPL). There is no justification if monitoring plan amended and informed officially.</p> <p>Soil Quality Analysis Report from BINALAB, No: 104-2/BINA/V/2018, dated 23 April 2018. Soil analysis for year 2018 conducted once a year, therefore it is not comply as required by environment management plan (RPL).</p>		
Corrections:	<ul style="list-style-type: none"> Take the soil sample and analyze in the laboratorium accordingly for period semester II; PT IIS Tungkal Ulu has take the soil sample in area of plantation Tungkal Ulu Estate to be analyze including soil sample in depth of 0 – 20 cm, 20 – 40 cm, 40 – 60 cm, 60 – 80 cm, 80 – 100 cm dan 100 – 120 cm in area disturbing and undisturbing (control). Soil sampling analysis to monitor the soil fertility covering parameter: Liat, Debu, Pasir, C-Organik, N-Total, C/N, Cd, Cu, and other soil micro, porositas and permaebility. Soil analysis conducted on 18 Mey 2019 by "Laboratorium Pengukuran dan Kualitas Lingkungan "Pro-Enviro". Soil analysis can be demonstrated and presented in document "Hasil analisis Pengujian Tanah No. 118-2/KT1/ENVIRO/VI/2019". Appointing PIC who responsible for soil analysis sampling dan delibver the sampel to the laboratorium to be analyze. PT IIS Tungkal Ulu has issued the Memorandum No. 160/SM-KTU/Memo/VII/2019, July 2019 concerning assignment PIC for Soil analysis monitoring. Memorandum stated and appointed Arda Siahaan (Mandor LA) as a PIC to take the soil sample and deliver to the laboratorium to be analyze. 		
Root Cause Analysis:	Tungkal Ulu management refer to regulation KepmenLH No. 29/2003 tentang pedoman, syarat dan tatacara perizinan pemanfaatan air limbah industri minyak sawit pada tanah diperkebunan kelapa sawit" which required soil analysis		

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	performed once a year while in matrik RPL stated that soil analysis shall be performed twice a year.
Corrective Actions:	<ul style="list-style-type: none"> • Training refreshment regarding RKL – RPL matriks implementation. PT IIS Tungkal Ulu has made the training program 2019 including refreshment training RKL – RPL matriks implementation. Training has been carried out on July 2019 by Muhamad Syahrial (Environment and Sustainability Officer). Training program will continue and performed once a year. • Monitoring and evaluation the implementation of RKL- RPL matriks each semester. PT IIS Tungkal Ulu has reported the implementation RKL – RPL semester I 2019 to BLH Tanjung Jabung Barat Regency.
Assessment Conclusion:	<p>The corrective actions made are sufficient and accepted. This Major NC is closed on 7 August 2019.</p> <p>ASA1_3 assessment verification:</p> <p>During the onsite visit and document verification obtained information that the corrective action plan has running well, monitored and evaluated regularly. Based on interview with the environmental officer obtain information that environmental monitoring was implemented as per RPL (Rencana Pemantauan Lingkungan) document.</p>

Non-conformity			
NCR Ref #	1761451-201905-M3	Date Issued	24 May 2019
Due Date	23 August 2019	Date of nonconformity Closure	7 August 2019
Clause & Category (Critical / Minor)	5.3.2 – Critical		
Statement of Nonconformity:	Internal audit RSPO SCCS in PT. Inti Indosawit Subur – Tungkal Ulu POM was not effectively carried out.		
Requirement Reference:	5.3.2 The site shall have a written procedure to conduct annual internal audit to determine whether the organization; i) conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. ii) effectively implements and maintains the standard requirements within its organization.		
Objective Evidence:	1. Internal audit RSPO SCCS for year 2018 only carried out once, while SOP clearly request for twice per year; 2. The internal audit process – as reported in the checklist, implies that the requirements related to RSPO SCCS General Requirement for Chain of Custody 5.5 Outsourcing – deemed not applicable. It is evident PT. Inti Indosawit Subur - Tungkal Ulu POM is using third-party transporter; 3. The internal audit process – as reported for RSPO SCCS clause 5.6.1, 5.7.1, 5.9.3 using records related to CPKO production???		

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Corrections:	Coordination with manager internal audit sustainability to made the audit program for RSPO SCC twice a year as per procedure. PT IIS Tungkal Ulu has made the audit programe for sustainability in "Rencana dan Realisasi Interlal Audit Pre and Post 2019", In the schedule Internal audit RSPO SCCS 2019 scheduled in May and August 2019. First internal audit RSPO SCCS for Tungkal Ulu POM has been conducted on 29 May 2019 and the second internal audit scheduled on August 2019. Internal audit on May 2019, there were 1 non conformities raised and Tungkal Ulu POM has taken action by correction and corrective action and the NC has been Closed. Evidence of Non conformity closing can be demonstrated. Internal audit report can be demonstrated and following the standard RSPO SCCS 2017.
Root Cause Analysis:	Internal audit RSPO SCCS was conducted integrated with other system (RSPO P & C, SMK3) which conducted once a year by internal auditor and not refer to Procedure "SOP Traceability AA-MPM-OP-1400.17-R6 dated 1 September 2017" that require twice a year.
Corrective Actions:	Maintain the schedule of internal audit RSPO SCCS twice a year and regularly review the internal audit report.
Assessment Conclusion:	<p>The corrective action made is sufficient and accepted. This Major NC is closed on 7 August 2019.</p> <p>ASA1_3 assessment verification:</p> <p>During the onsite visit and document verification obtained information that the corrective action plan has running well, monitored and evaluated regularly. The last internal audit SCC has been carried out on 8 – 15 February 2021.</p>

Non-conformity			
NCR Ref #	1761451-201905-M4	Date Issued	24 May 2019
Due Date	23 August 2019	Date of nonconformity Closure	7 August 2019
Clause & Category (Critical / Minor)	5.5.2 Critical		
Statement of Nonconformity:	PT. Inti Indosawit Subur cannot demonstrate there is control over outsourced transporter		
Requirement Reference:	5.5.2 Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following: <ol style="list-style-type: none"> a. The site 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 site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary. b. The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. 		

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Objective Evidence:	<p>PT. Inti Indosawit Subur cannot demonstrate there is control upon outsourcing transporter:</p> <p>a. b. PT. Inti Indosawit Subur cannot demonstrate 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 site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>b. PT. Inti Indosawit Subur cannot demonstrate control system and communicated the outsourced transport contractor.</p>
Corrections:	<ul style="list-style-type: none"> • PT IIS Tungkal Ulu has made the new contract agreement with transporter "PT Mitra Abadi Damai" dated 2 August 2019. The contract agreement has covered: <ul style="list-style-type: none"> ✓ Outsourced process with transporter including right and responsibility between two parties, ✓ Transporter is committed to comply with RSPO SCCS standard and following the regulation ✓ Transporter is willing to be audited by Certification Body as necessary concerning on RSPO SCCS. <p>The contract agreement has been signed by two parties both PT IIS – Tungkal Ulu POM (on behalf PT Inti Indosawit Subur Group) and PT Mitra Damai Abadi.</p> • PT IIS Tungkal Ulu has a procedure to control the outsourced transporter through "SOP Traceability AA-MPM-OP-1400.17-R6 dated 1 September 2017" Internal control for CPO and PK delivery by contractor has made as well by: <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. ✓ 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. ✓ Recapitulation of CPO and PK incoming from PT Sari Dumai Sejati, contain information of CPO/PK incoming date to PT SDS, Vehicle Number, origin of CPO and PK, Volume of CPO and PK deliver by Tungkal Ulu POM and receive by PT SDS, variant of volume, percentage of variant, quality of CPO and PK (FFA and moisture) deliver by Tungkal Ulu POM and receive by PT SDS (Bulking station). In addition, PT Sari Dumai Sejati has implementing the certification of RSPO SCCS and has been certified by Control Union with RSPO Certificate Number CU-RSPO SCC-821960 valid until 29/08/2022. It is indicated that PT SDS has internal control to ensure and monitor the compliance of CPO/PK delivery by transporter.
Root Cause Analysis:	<p>PT IIS Tungkal Ulu POM deemed that "Surat Perintah Kerja (SPK)" for transporter is the contract, however SPK is not covering the agreement between two parties and not signed by transporter and only by PT IIS – Tungkal Ulu.</p>
Corrective Actions:	<p>Conduct the internal audit regularly and include the transporter/outsourced process in the internal audit checklist.</p>

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Assessment Conclusion:	<p>The corrective actions made are sufficient and accepted. This Major NC is closed on 7 August 2019.</p> <p>ASA1_3 assessment verification:</p> <p>During the onsite visit and document verification obtained information that the corrective action plan has running well, monitored and evaluated regularly. The evidence can be sighted in the last internal audit SCC report on 8 – 15 February 2021.</p>
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Non-conformity			
NCR Ref #	1761451-201905-M5	Date Issued	24 May 2019
Due Date	23 August 2019	Date of nonconformity Closure	7 August 2019
Clause & Category (Critical / Minor)	5.6.1 – Critical		
Statement of Nonconformity:	PT. Inti Indosawit Subur – Tungkal Ulu POM cannot demonstrate maintain accurate RSPO certificate number of the sellers in the dispatch slipnote for delivery of CSPO to customer, using RSPO 564422 code instead of RSPO 594422.		
Requirement Reference:	<p>5.6.1 The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form.</p> <p>2.4 The name and address of the buyer; 2.5 The name and address of the seller; 2.6 The loading or shipment/ delivery date; 2.7 The date on which the documents were issued; 2.8 A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); 2.9 The quantity of the products delivered; 2.10 Any related transport documentation; 2.11 Supply chain certificate number of the seller;</p> <p>A unique identification number.</p>		
Objective Evidence:	<p>Incorrect RSPO Certificate number of the seller identified in contract - delivery order - dispatch note:</p> <p>Contract: "Kontrak Penjualan No.03003/CB-10/02/19 antara PT. Inti Indosawit Subur dan PT. Sari Dumai Sejati" dated 1 March 2019 for sales of 487,860 kg commodity Miyak Kelapa Sawit RSPO; Supply Chain Model Mass Balance; Certificate RSPO 564422.</p> <p>Delivery Order: Delivery Order PT. Inti Indosawit Subur No.03003/DB10/02/19 dated 1 March 2019, instruction to PT. Inti Indosawit Subur - Manager Tangki TImbun Rengat to deliver 487,860 kg commodity Minyak Kelapa Sawit RSPO; Supply Chain Model Mass Balance; No.Ref.RSPO 564422.</p> <p>Dispatch slipnote:</p>		

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	<ul style="list-style-type: none"> - Dispatch slipnote Tungkal Ulu POM No.PTUC118202500 dated 1 December 2018. Destination PT. Inti Indosawit Subur-Teluk Bagus, Rengat. Commodity CPO Certified RSPO. Supply Chain Model Mass Balance. RSPO Certificate No.RSPO594422. DO No.11329/DB10/02/18. Transporter PT. Sumber Kencana Inhu, No. SK.01/SKI/12/10; Vehicle No.BM8884BU. Volume dispatched 22.920 MT. Batch No.RSPO564422. - Dispatch slipnote Tungkal Ulu POM No.PTUC119200235 dated 1 February 2019. Destination PT. Inti Indosawit Subur-Teluk Bagus, Rengat. Commodity CPO Certified RSPO. Supply Chain Model Mass Balance. RSPO Certificate No.RSPO594422. DO No.01329/DB10/02/19. Transporter PT. Sumber Kencana Inhu, No. SK.04/SKI/02/19; Vehicle No.BM9815BU. Volume dispatched 24.620 MT. Batch No.RSPO564422.
<p>Corrections:</p>	<p>PT IIS Tungkal Ulu has made coordination and communication with Marketing Head Office Medan to correct the certificate number in slipnote for delivery of CSPO/CSPK to customer manually and by system WBS (Weighbridge System). Certificate number has been revised from RSPO 564422 to become RSPO 594422. During verification audit can be demonstrated that the certificate number in the in slipnote for delivery of CSPO/CSPK was correct and appropriate.</p> <p>Verification of certificate number also taken for weighbridge ticket and shown that the certificate number is aligned with slipnote for delivery of CSPO/CSPK. Sample seen: slipnote for delivery of CSPO/CSPK to PT Sari Dumai Sejati, DO No. 07012/DB10/02/19 dated 8 July 2019, No. Ref. RSPO Cert = RSPO 594422; Weighbridge Ticket No. PTUC119101072 dated 8 July 2019, Commodity: CPO Certified RSPO, Netto 23,190 kg, DO No. 07012/DB10/02/19 for PT Sari Dumai Sejati, RSPO Cert.: RSPO594422.</p>
<p>Root Cause Analysis:</p>	<p>Human error by Marketing HO Medan whose input the number of certificate in the dispatch slipnote for delivery of CSPO to customer, and there is no control and monitoring from PT IIS – Tungkal Ulu to ensure the appropriate number of certificate.</p>
<p>Corrective Actions:</p>	<p>PT IIS Tungkal Ulu POM has assigned the PIC to monitor the administration for delivery of CSPO/CSPK to customer including the correct number of RSPO certificate in the document of slipnote for delivery of CSPO/CSPK and Weighbridge Ticket. PIC appointed was Mr. Ridwan (Kerani Produksi) through Memorandum No. 139/MGR/PTU/VII/19, July 2019 signed by Senior Mill Manager Tungkal Ulu POM.</p>
<p>Assessment Conclusion:</p>	<p>The corrective actions made are sufficient and accepted. This Major NC is closed on 7 August 2019.</p> <p>ASA1_3 assessment verification:</p> <p>During the onsite visit and document verification obtained information that the corrective action plan has running well, monitored and evaluated regularly. The certificate holder has shown the record of transaction which include the detail of minimum information for RSPO certified products such as certificate number, name of buyer/seller, volume, date of shipment/delivery and description of products.</p>

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Non-conformity			
NCR Ref #	1761451-201905-M6	Date Issued	24 May 2019
Due Date	23 August 2019	Date of nonconformity Closure	7 August 2019
Clause & Category (Critical / Minor)	5.9.1 – Critical		
Statement of Nonconformity:	PT. Inti Indosawit Subur – Tungkal Ulu POM cannot demonstrate maintain accurate RSPO certificate details in the dispatch slipnote for delivery of CSPO to customer.		
Requirement Reference:	5.9.1 The organization shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements.		
Objective Evidence:	<p>Incorrect RSPO Certificate number of the seller identified in contract - delivery order - dispatch note:</p> <p>Contract: "Kontrak Penjualan No.03003/CB-10/02/19 antara PT. Inti Indosawit Subur dan PT. Sari Dumai Sejati" dated 1 March 2019 for sales of 487,860 kg commodity Miyak Kelapa Sawit RSPO; Supply Chain Model Mass Balance; Certificate RSPO 564422.</p> <p>Delivery Order: Delivery Order PT. Inti Indosawit Subur No.03003/DB10/02/19 dated 1 March 2019, instruction to PT. Inti Indosawit Subur - Manager Tangki TImbun Rengat to deliver 487,860 kg commodity Minyak Kelapa Sawit RSPO; Supply Chain Model Mass Balance; No.Ref.RSPO 564422.</p> <p>Dispatch slipnote:</p> <ul style="list-style-type: none"> - Dispatch slipnote Tungkal Ulu POM No.PTUC118202500 dated 1 December 2018. Destination PT. Inti Indosawit Subur-Teluk Bagus, Rengat. Commodity CPO Certified RSPO. Supply Chain Model Mass Balance. RSPO Certificate No.RSPO594422. DO No.11329/DB10/02/18. Transporter PT. Sumber Kencana Inhu, No. SK.01/SKI/12/10; Vehicle No.BM8884BU. Volume dispatched 22.920 MT. Batch No.RSPO564422. - Dispatch slipnote Tungkal Ulu POM No.PTUC119200235 dated 1 February 2019. Destination PT. Inti Indosawit Subur-Teluk Bagus, Rengat. Commodity CPO Certified RSPO. Supply Chain Model Mass Balance. RSPO Certificate No.RSPO594422. DO No.01329/DB10/02/19. Transporter PT. Sumber Kencana Inhu, No. SK.04/SKI/02/19; Vehicle No.BM9815BU. Volume dispatched 24.620 MT. Batch No.RSPO564422. 		
Corrections:	PT IIS Tungkal Ulu has made coordination and communication with Marketing Head Office Medan to correct the certificate number in slipnote for delivery of CSPO/CSPK to customer manually and by system WBS (Weighbridge System). Certificate number has been revised from RSPO 564422 to become RSPO 594422. During verification audit can be demonstrated that the certificate number in the in slipnote for delivery of CSPO/CSPK was correct and appropriate. Verification of certificate number also taken for weighbridge ticket and shown that the certificate number is aligned with slipnote for delivery of CSPO/CSPK. Sample seen: slipnote for delivery of CSPO/CSPK to PT Sari Dumai Sejati, DO No. 07012/DB10/02/19 dated 8 July 2019, No. Ref. RSPO Cert = RSPO 594422; Weighbridge Ticket No.		

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	PTUC119101072 dated 8 July 2019, Comodity: CPO Certified RSPO, Netto 23,190 kg, DO No. 07012/DB10/02/19 for PT Sari Dumai Sejati, RSPO Cert.: RSPO594422.
Root Cause Analysis:	Human error by Marketing HO Medan whose input the number of certificate in the dispatch slipnote for delivery of CSPO to customer, and there is no control and monitoring from PT IIS – Tungkal Ulu to ensure the appropriate number of certificate.
Corrective Actions:	PT IIS Tungkal Ulu POM has assigned the PIC to monitor the administration for delivery of CSPO/CSPK to customer including the correct number of RSPO certificate in the document of slipnote for delivery of CSPO/CSPK and Weighbridge Ticket. PIC appointed was Mr. RIDwan (Kerani Produksi) through Memorandum No. 139/MGR/PTU/VII/19, July 2019 signed by Senior Mill Manager Tungkal Ulu POM.
Assessment Conclusion:	<p>The corrective actions made are sufficient and accepted. This Major NC is closed on 7 August 2019.</p> <p>ASA1_3 assessment verification:</p> <p>During the onsite visit and document verification obtained information that the corrective action plan has running well, monitored and evaluated regularly. The certificate holder has shown the record of transaction which include the detail of minimum information for RSPO certified products such as certificate number, name of buyer/seller, volume, date of shipment/delivery and description of products.</p>

Non-conformity			
NCR Ref #	1761451-201905-N1	Date Issued	24 May 2019
Due Date	Next ASA	Date of nonconformity Closure	8 July 2020
Clause & Category (Critical / Minor)	2.1.2 – Minor		
Statement of Nonconformity:	PT. Inti Indosawit Subur – Tungkal Ulu have not maintained written information on legal requirements.		
Requirement Reference:	2.1.2 A documented system, which includes written information on legal requirements, shall be maintained.		
Objective Evidence:	<p>PT. Inti Indosawit Subur have prepared the list of relevant laws and regulation. However, the certificate holder unable to demonstrate a complete and applicable regulation, as identified in the RSPO P&C 2013, Indonesia National Interpretation, September 2016 – appendix 1.</p> <p>PT. Inti Indosawit Subur have not identified and evaluated these applicable regulations:</p> <ul style="list-style-type: none"> • Undang-undang No.80 tahun 1957 tentang Ratifikasi Konvensi ILO No. 100 tahun 1951 tentang Pengupahan yang sama Bagi Pekerja Laki-laki dan Wanita untuk Pekerjaan yang Sama Nilainya; • Undang-undang No.19 tahun 1999 tentang Ratifikasi ILO Convention No.105 tahun 1957 mengenai Penghapusan Kerja Paksa; 		

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	<ul style="list-style-type: none"> • Undang-undang No.20 tahun 1999 tentang Ratifikasi ILO Convention No.138 tahun 1973 tentang Batas Usia Minimum; • Undang-undang No.29 tahun 1999 tentang Ratifikasi Konvensi Internasional tentang Penghapusan Segala Bentuk Diskriminasi (Convention on the Elimination of All Forms of Racial Discrimination - CERD); • Undang-undang No.24 tahun 2011 tentang Badan penyelenggara Jaminan Sosial; • Peraturan Menteri Tenaga Kerja No.4 tahun 1987 tentang P2K3 serta Tatacara Penunjukan Ahli K3; • Peraturan Menteri Tenaga Kerja No.7 tahun 2007 tentang Baku Mutu Sumber Tidak Bergerak bagi Ketel Uap; • Peraturan Menteri Tenaga Kerja No.9 tahun 2010 tentang Operator dan Petugas Pesawat Angkat dan Angkut; • Keputusan Menteri Tenaga Kerja No.100 tahun 2004 tentang Ketentuan Pelaksanaan Perjanjian Kerja Waktu Tertentu (PKWT); • PP No. 101 tahun 2014 tentang Pengelolaan Limbah B3; • Peraturan Menteri Lingkungan Hidup Dan Kehutanan Republik Indonesia Nomor P.20/MENLHK/SETJEN/KUM.1/6/2018 Tentang Jenis Tumbuhan Dan Satwa Yang Dilindungi.
Corrections:	<ul style="list-style-type: none"> • Give awareness to the PIC (Humas) By Sustainability Team regarding the mechanism of regulation updating and ensure the PIC performing the regulation updating once a year as per procedure. • Updating the newest relevant regulation accordingly.
Root Cause Analysis:	<ul style="list-style-type: none"> • PIC (Humas) to conduct regular update of relevant regulation are not aware regarding how to update and get the new regulation. • Internal audit RSPO has not cover and ensure the newest regulation has been updated.
Corrective Actions:	<p>Conducted regular internal audit RSPO covering the checking of updating the newest regulation and ensure the evaluation has been performed and updated.</p>
Assessment Conclusion:	<p>Verification during remote audit on 6 - 8 July 2020.</p> <ol style="list-style-type: none"> 1. Unit of Certification has an updated list of relevant regulation as required within P&C INA-NI 2020 Annex 3 for International Laws and Convention Applicable to the Production of Palm Oil and Indonesia Rules and Regulations Reference. 2. Evaluation of Comply with Law and Regulation namely "Evaluasi Kepatuhan Hukum Kebun/Pabrik Tungkal Ulu" dated 1st April 2019. According to this corrective action made, auditor conclude this Minor NC is Closed satisfactorily. <p>Based on that verification, this Noncompliance are met. The implementation will be verify during onsite audit.</p> <p>ASA1_3 assessment verification:</p> <p>During the onsite visit and document verification obtained information that the corrective action plan has running well, monitored and evaluated regularly.</p>

Non-conformity																					
NCR Ref #	1761451-201905-N2	Date Issued	24 May 2019																		
Due Date	Next ASA	Date of nonconformity Closure	8 July 2020																		
Clause & Category (Critical / Minor)	4.6.4 – Minor																				
Statement of Nonconformity:	The Certificate Holder has no commitment and effort to minimizing and eliminating of Paraquat used.																				
Requirement Reference:	4.6.4 The evidence shall be available to demonstrate that use of Pesticides, categorized in Class 1A or 1B by World Health Organization, or those are listed in the Stockholm and Rotterdam Conventions, and paraquat are not used, except in specific situations identified in national Best Practice guidelines. The use of such pesticides shall be minimized and eliminated as part of a plan, and shall only be used in exceptional circumstances.																				
Objective Evidence:	According to Record of Paraquat used in last 5 years (2014 – 2018), volume of Paraquat used in Tungkal Ulu Estate is significant increasing within 2015 to 2017, as shown on graphic below: <div style="text-align: center;"> <table border="1"> <caption>Record of Paraquat Used in last 5 years</caption> <thead> <tr> <th>Year</th> <th>Tungkal Ulu Estate (L)</th> <th>Tungkal Ulu Smallholders (L)</th> </tr> </thead> <tbody> <tr> <td>2014</td> <td>172</td> <td>2,648.2</td> </tr> <tr> <td>2015</td> <td>684</td> <td>2,604.6</td> </tr> <tr> <td>2016</td> <td>2,325.5</td> <td>2,222</td> </tr> <tr> <td>2017</td> <td>3,228</td> <td>2,093.0</td> </tr> <tr> <td>2018</td> <td>3,145</td> <td>2,047.0</td> </tr> </tbody> </table> </div> <p>There is not enough evidence that the Certificate Holder has plan to eliminate Paraquat uses for any reason in the future.</p>			Year	Tungkal Ulu Estate (L)	Tungkal Ulu Smallholders (L)	2014	172	2,648.2	2015	684	2,604.6	2016	2,325.5	2,222	2017	3,228	2,093.0	2018	3,145	2,047.0
Year	Tungkal Ulu Estate (L)	Tungkal Ulu Smallholders (L)																			
2014	172	2,648.2																			
2015	684	2,604.6																			
2016	2,325.5	2,222																			
2017	3,228	2,093.0																			
2018	3,145	2,047.0																			
Corrections:	Find the new alternative formula/material to substitute the paraquat usage and stop the paraquat usage after November 2019.																				
Root Cause Analysis:	Based on best management practice agronomy and internal policy of Asian Agri Group, paraquat remain use as a herbicide for particular use such as hard weeds and nursery and currently company has not been determined and found the best substitution formula to change the paraquat usage.																				
Corrective Actions:	Ensure the company not use the paraquat after November 2019																				
Assessment Conclusion:	Verification during remote audit on 6 - 8 July 2020.																				

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	<p>1. Unit of Certification has an updated list of relevant regulation as required within P&C INA-NI 2020 Annex 3 for International Laws and Convention Applicable to the Production of Palm Oil and Indonesia Rules and Regulations Reference.</p> <p>2. Evaluation of Comply with Law and Regulation namely "Evaluasi Kepatuhan Hukum Kebun/Pabrik Tungkal Ulu" dated 1st April 2019.</p> <p>According to this corrective action made, auditor conclude this Minor NC is Closed satisfactorily.</p>
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Non-conformity			
NCR Ref #	1761451-201905-N3	Date Issued	24 May 2019
Due Date	Next ASA	Date of nonconformity Closure	8 July 2020
Clause & Category (Critical / Minor)	6.1.4 – Minor		
Statement of Nonconformity:	<p>PT Inti Indosawit Sawit – Tungkal Ulu was consistent in conducting periodic review of plan for management and monitoring of social impacts (minimum 2 years basis), last review was conducted in 2 January 2018 recorded on "Rencana Kelola Sosial Kebun Tungkal Ulu"</p> <p>However, there was 4 of 5 point of plan for management and monitoring of social impacts as in document of Social Impact Assessment Bab VII. "Rencana Kelola Sosial PT Inti Indosawit Subur Kebun Tungkal Ulu" has not been reviewed (dated 2 January 2018).</p>		
Requirement Reference:	<p>6.1.4</p> <p>The documented plan for management and monitoring of social impacts, shall be reviewed at least on two-yearly basis. If necessary, the plan should be updated. There shall be evidence that the review process includes participation of all affected parties.</p>		
Objective Evidence:	<p>PT Inti Indosawit Sawit – Tungkal Ulu was consistent in conducting periodic review of plan for management and monitoring of social impacts (minimum 2 years basis), last review was conducted in 2nd January 2018 recorded on "Rencana Kelola Sosial Kebun Tungkal Ulu"</p> <p>However, there was 4 of 5 point of plan for management and monitoring of social impacts as in document of Social Impact Assessment Bab VII. "Rencana Kelola Sosial PT Inti Indosawit Subur Kebun Tungkal Ulu" has not been reviewed (dated 2 January 2018), such as:</p> <ul style="list-style-type: none"> • 7.1. "Rencana Kelola Sosial Aspek Tenural": legalitas kemitraan dan plasma WD) • 7.2. "Rencana Kelola Sosial Aspek Pola Kerjasama": pola kerjasama dan pelatihan pembinaan • 7.3. "Rencana Kelola Sosial terkait Aspek Sosial Ekonomi Pedesaan dan Pemberdayaan Masyarakat": pemeliharaan jalan/jembatan desa dan jalan produksi plasma, standar mutu TBS & sortasi, kelembagaan petani, replanting, program bantuan CSR dan permasalahan lainnya. • 7.5. "Rencana Kelola Sosial terkait Permasalahan Lingkungan Hidup". 		

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	The review of plan for management and monitoring of social impacts has only discussed point 7.4 "Rencana kelola social aspek ketenagakerjaan PT Inti Indosawit Subur".
Corrections:	<ul style="list-style-type: none"> • Appointed the PIC to review the effectiveness of management and monitoring of social program in according to SIA. • Monitor the SIA review each 2 year by management site and sustainability team.
Root Cause Analysis:	Tungkal Ulu POM has not determined the appointed person/PIC to conduct regular review regarding SIA management and monitoring.
Corrective Actions:	Regularly monitor and review the SIA management and monitoring.
Assessment Conclusion:	<p>Based on document verification during remote audit on 6 - 8 July 2020 obtain:</p> <ul style="list-style-type: none"> • The appointment of the PIC for those responsible for the SIA report is HUMAS-Public Relations, based on Memorandum from the Senior Manager of Tungkal Ulu Estate dated 10 July 2020 No. 188/ES-KTU/MEMO/VII/2019, related to the appointment of Public Relations (Humas) PT IIS - Tungkal Ulu on behalf of Bpk. Joko Rianto to conduct review of social impact assessment (SIA) bases 2 years. • Review of social impact management was carried out by Tungkal Ulu Estate and Mill on 10 July 2019 recorded in Review Efektifitas SIA PT IIS Kebun Tungkal Ulu Group. The Monitoring of its environmental and social management has been reported in the RKL-RPL Report for the January-June 2020 Period, which includes: <ol style="list-style-type: none"> 1) The issues related to land conflicts and the legality of land owned by plasma (farmers) has not become a significant social issue, although there are still issues related to the process of managing STDB (Surat Tanda Daftar Budidaya) and SPPL (Surat Pernyataan Pengelolaan Lingkungan) as a requirement for replanting programs. 2) Increasing the empowerment of plasma farmers through: <ul style="list-style-type: none"> - Conduct counseling to the community, employees and smallholders about the existence of water biota and river border conservation (Sempadan sungai). - Counseling to local communities about fish farming - Conduct counseling and training to smallholders and plantation staff on integrated crop maintenance. - Providing technical guidance both procedures and administrative to smallholders to be able to work in the company 3) Road conditions in Tungkal Ulu Plasma plantations an issue that always occurs and becomes the main problem to get good quality FFB production ("no restan"). Road maintenance and repair programs in the Tungkal Ulu Plasma are programmed every year using heavy equipment or manuals which managed by each KUD. 4) Monitoring related to the environment that is applied to all workers in the PT IIS - Tungkal Ulu including Plasma TUn gla Ulu, such as: <ul style="list-style-type: none"> - Gradually program the use of environmentally friendly organic fertilizers (e.g implementation of EFB application and Land Application) - Fertilize according to recommendations with the 4 T principle (Timely, precise dosage, precise type and exact car/method) - Maintaining cover crops and placing the midrib on the path (gawangan mati) or outside of the circle and harvesting path.

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	<ul style="list-style-type: none"> - Conduct waste management, provide facilities for waste collection, and build special rooms for B3 waste (temporary hazardous waste storage-TPS LB3) - Installation of signboard; sign of a ban on fishing in the river by poisoning. - Installation of signboard; sign of "Do not damage a natural predators. - Monitor the biota (flora and fauna) of the Benanak River and Lampisi River. <ul style="list-style-type: none"> • Monitoring of the management of environmental and social aspects has been carried out through the January-June 2020 RKL-RPL report. <p>Documents/data verified:</p> <ul style="list-style-type: none"> - RKL-RPL Report for Semester I/2020 Period; as a management report on environmental and social aspects which is also a review of the results of the previous period's management. - Review of the SIA Effectiveness of PT IIS Kebun Tungkal Ulu Group as of 10 July 2019. - Sample of questionnaire from stakeholders, which is a stakeholder participation in controlling aspects of environmental and social impacts at PT IIS - Tungkal Ulu. <p>Based on the results of the verification, PT IIS - Tungkal Ulu Estate, Plasma and Mill have conducted a review and monitoring of aspects of environmental and social impacts and the corrective actions have been effectively carried out and this finding can be "Closed".</p>
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Opportunity for Improvement	
OFI#	Description
OFI 1	NIL

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-1.2)				
1761451-201905-M1	Critical	1.2.1	24 May 2019	7 August 2019
1761451-201905-M2	Critical	5.1.3	24 May 2019	7 August 2019
1761451-201905-M3	Critical	5.3.2	24 May 2019	7 August 2019
1761451-201905-M4	Critical	5.5.2	24 May 2019	7 August 2019
1761451-201905-M5	Critical	5.6.1	24 May 2019	7 August 2019
1761451-201905-M6	Critical	5.9.1	24 May 2019	7 August 2019
1761451-201905-N1	Minor	2.1.2	24 May 2019	8 July 2020
1761451-201905-N2	Minor	4.6.4	24 May 2019	8 July 2020

1761451-201905-N3	Minor	6.1.4	24 May 2019	8 July 2020
Current Assessment ASA-1.3 (Remote Audit)				
1932214-202007-M1	Critical	3.8.6	8 July 2020	7 September 2020
1932214-202007-M2	Critical	4.1.1	8 July 2020	7 September 2020
1932214-202007-M3	Critical	6.6.2	8 July 2020	7 September 2020
Current Assessment ASA-1.3 and ASA-1.4 (Onsite Audit)				
2107728-202109-M1	Critical	6.7.3	18 September 2021	29 November 2021

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 **PT Inti Indosawit Subur – Tungkal Ulu 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)
Government Agencies	<i>Dinas Lingkungan Hidup Kabupaten Tanjung Jabung Barat – Environmental Agency</i>	Phone interview
	<i>Dinas Tenaga Kerja dan Transmigrasi Kabupaten Tanjung Jabung Barat – Manpower Agency</i>	Phone interview
	<i>Dinas Perkebunan Kabupaten Tanjung Jabung Barat - Plantation Agency</i>	Phone interview
	<i>Badan Kesatuan Bangsa dan Politik Kabupaten Tanjung Jabung Barat - National and Political Unity Agency</i>	Phone interview
Communities	Village representatives of Desa Tanjung Pauh	Face to face interview

	Village representatives of Desa Tanjung Paku	Face to face interview
External parties (KUD)	Scheme smallholders (KUD Panca Mukti)	Face to face interview
	Smallholders member as audit sample (KUD Sawit Kita, Karya Kita, Karya Jaya, Panca Mukti, Sari Bumi and KUD Sawit Mulia)	Face to face interview
Local NGO	Wahana Lingkungan Hidup – Jambi	Face to face interview
	Persatuan Petani Jambi – Jambi	Face to face interview
Internal stakeholder	Gender committee	Face to face interview
	Worker union/KSBSI	Face to face interview
	Worker cooperative of Jaya Abadi	Face to face interview
Local contractor	Merlung Topaz	Phone interview

Stakeholders comment

1	<p>Feedbacks: Marianis – Committee Gender</p> <ul style="list-style-type: none"> There is no sexual harassment report during period 2020 and 2021. The company has given time for new mothers to breastfeed their babies. There is no issue regarding the gender, discrimination and/or sexual harassment in period 2019, 2020 and 2021 at Mill and Estates. Gender Committee has understood regarding the grievance mechanism as well as the protection of the identity of the complainants/whistle-blower. The company has implemented the sexual harassment policy. Unit of Certification has provided pregnancy test to spraying workers and fertilization workers every month. Due to pandemic Covid-19, some gender committee activities in 2020 and 2021 has been postponed until the situation returns to normal. <p>Audit Team verification and response: The company has maintained good management of occupational and social policy, all feedback from workers union are positive as well as previous assessment, audit team acknowledge the positive feedback.</p>
2	<p>Feedbacks: Hapisni – Worker Union "KSBSI - Konfederasi Serikat Buruh Seluruh Indonesia"</p> <ul style="list-style-type: none"> The company has realized employee normative rights such as remuneration in accordance with applicable regulations, allowances/THR and BPJS Program. Communication has gone well with the company. Legally union member is a labor consist of Permanent Workers (SKU-H & SKU-B), however operationally union also consider the problems that occur at the level of daily workers. Daily workers have had a Work Agreement (SPK) with the company. There is no indication that organisation conducted discrimination against to the workers. Organisation has provided PPE for all workers.

	<ul style="list-style-type: none"> • The company has provided the workers amenities, such as; housing, clean water, electricity, toilets, sanitation, clinics, day care, place of worship, etc. • The company has registered all workers in BPJS program (Accident and Health Insurance) including daily workers. • The company has provided wages in accordance with the regulations. • There is no indication of the company has violated of Human Rights. • There is no indication of forced labor or coercive labor practice of work.
	<p>Audit Team verification and response: The company has maintained good management of occupational and social policy, all feedback from workers union are positive as well as previous assessment, audit team acknowledge the positive feedback.</p>
<p>3</p>	<p>Feedbacks: Neneng Nurhayati –Cooperation “Koperasi Jaya Abadi”</p> <ul style="list-style-type: none"> • The <i>Koperasi</i> business includes provision of basic goods. • The Annual Member Meeting (RAT) for period 2020 has conducted in December 2020. • The members of <i>Koperasi</i> is Permanent Workers (SKU). Daily workers can receive <i>Koperasi</i> services based on Letter Agreement from Mandor/Supervisor. • Company has provided assistance to the <i>Koperasi</i> such as provide building, clean water and electricity. • <i>Koperasi</i> has assisted employees in accessing basic goods, because access to the marketplace is quite far 6 Km or 30 minutes by motorcycle.
	<p>Audit Team verification and response: The company has maintained good commitment related to worker’s cooperative such as facility and other support.</p>
<p>4</p>	<p>Feedbacks: Merlung Topaz – FFB Supplier</p> <ul style="list-style-type: none"> • The contractors have an agreement as FFB suppliers. As written in the contract, the supplier shall avoid illegal FFB supply. The violation of the agreement could be terminated the contract. • The communication has gone well with the company. • Payment process has gone well. • Contractors has understood against of Company Policy and Grievance Mechanism. • The contractors have registered their employee to the Accident Insurance (<i>BPJS Ketenagakerjaan</i>) and has provided PPE (helmet, mask and boot).
	<p>Audit Team verification and response: The company has maintained good partnership with local supplier related to zero illegal FFB, payment and OHS.</p>
<p>5</p>	<p>Feedbacks: Dinas Lingkungan Hidup Kabupaten Tanjung Jabung Barat – Environmental Agency Reza</p> <ul style="list-style-type: none"> • The company has sent reports related to environmental management (RKL-RPL, Hazardous Waste Reports, Liquid Waste Reports) on a regular basis. • There have been complaints of environmental pollution from the impact of Land Applications (LA). However, based on field verification by the Environment Agency team, it was concluded that there were no indications of river water pollution due to the Land Application.

	<ul style="list-style-type: none"> The Environment Agency does not know in detail the issue of land disputes between the people of Tanjung Paku Village and the company.
	<p>Audit Team verification and response: The company has maintain good performance on environmental issue.</p>
6	<p>Feedbacks: <i>Dinas Perkebunan Kabupaten Tanjung Jabung Barat - Plantation Agency</i> Dani</p> <ul style="list-style-type: none"> There were no significant issues received by the Plantation Office related to the operations of PT IIS Tungkal Ulu. The company has completely submitted reports related to plantation operations. The company has a plasma program of the PIR-TRANS scheme, including for local communities. The plantation assessment has been carried out and has received a good predicate. It is noted that there is a land dispute issue with the people of Tanjung Paku Village which is currently in progress and is being mediated by the local government.
	<p>Audit Team verification and response: Audit team will continue to monitor the company management and monitoring performance.</p>
7	<p>Feedbacks: <i>Dinas Tenaga Kerja dan Transmigrasi Kabupaten Tanjung Jabung Barat – Manpower Agency</i> Saudi</p> <ul style="list-style-type: none"> There was once an industrial relations dispute but it was resolved with the facilitation of the District Manpower Agency (Tripartite) regarding the demands for a wage scale structure. Employment legal requirements have been met properly, including licensing and reporting obligations. All employees have been included in the BPJS (Employment and Health) program. Companies are asked to prioritize internal settlements between the company and their employees.
	<p>Audit Team verification and response: The company has maintain good performance on manpower issue.</p>
8	<p>Feedbacks: <i>Badan Kesatuan Bangsa dan Politik Kabupaten Tanjung Jabung Barat - National and Political Unity Agency</i> Taufik</p> <p>Not willing to provide information related to the land dispute between the people of Tanjung Paku Village and PT IIS Tungkal Ulu because currently it is still in the facilitation process.</p>
	<p>Audit Team verification and response: The company has taken action with gathering information from the other parties (the company itself, the villagers and local NGO's).</p>
9	<p>Feedbacks: <i>Kantor Pertanahan Nasionan Kabupaten Tanjung Jabung Barat – National Land Agency</i></p> <p>The CB's has sent invitation of public consultation, however there was no personnel in charge can be contacted until the end of audit.</p>

	<p>Audit Team verification and response:</p> <p>Certificate holder has had the land title for entire operational areas. Total operating area align with the land title certificate. There was no new application of land title.</p>
10	<p>Feedbacks:</p> <p>Wahana Lingkungan Hidup (WALHI Jambi) and Persatuan Petani Jambi (PPJ) Abdullah and Erizal</p> <ul style="list-style-type: none"> • The plasma around PT IIS Tungkal Ulu is a PIR-Trans program including Tanjung Paku Village. At that time WALHI Jambi also became a facilitator in the PIR-Trans program but Tanjung Paku Village withdrew as a village facilitated by WALHI Jambi. • The people of Tanjung Paku during the 2020-2021 period have submitted requests for facilitation 3 times for the claimed land covering an area of 107 Ha which is calculated from 0.8 Ha x the number of CPCL at the beginning of 129 participants. • The community has already received profit sharing in 2000 but has stopped until now. • The disputed land has become the HGU of PT IIS Tungkal Ulu. • The people of Tanjung Paku Village have asked for facilitation from the Tanjung Jabung Barat Regency Integrated Team until they take action on land occupation on 23 – 24 June 2021. • Until now, the land area of 107 Ha is still managed by PT IIS Tungkal Ulu. • The community needs clarity on the company regarding the 107 Ha land claimed by the Tanjung Paku community. • Walhi and PPJ recommended the auditor team to consult with the village head and the Tanjung Paku community. <p>Audit Team verification and response:</p> <p>The settlement of land disputes between the residents of Tanjung Paku Village and the company is ongoing and has received attention from relevant government agencies, especially the Tanjung Jabung Barat Regional Government.</p> <p>The auditor team has contacted the parties in an effort to monitor any developments in this dispute.</p>
11	<p>Feedbacks:</p> <p>Village head of Tanjung Paku and the farmer group that claimed the land</p> <ol style="list-style-type: none"> 1. The Head of Village and Community Leaders of Tanjung Paku Village requested that PT IIS Tungkal Ulu's RSPO certificate be revoked because there are still conflicts with Tanjung Paku villagers. 2. The people of Tanjung Paku Village were never involved/asked for approval at the time of the issuance of the PT IIS Tungkal Ulu HGU certificate. 3. There are no members of the Tanjung Paku village community who are members of the KKPA 4. The community received information that the company submitted the land dispute with the residents of the village of Tanjung Paku through legal channels. 5. The community has received the distribution of garden produce 2 times in 2020 but until now it has stopped. Evidence of payment receipts from the sale of FFB sales for an area of 107.7 hectares worth Rp. 35,187,132.86 of 153,101 tons of FFB. Accepted and signed by the five community representatives. 6. The community stated that there was no longer room for negotiation of the partnership scheme and requested that the 107 ha of land be returned to the people of Tanjung Paku Village. 7. The village head submits copies of the land dispute documents between the Tanjung Paku Village Community and PT IIS Tungkal Ulu in the form of:

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	<ul style="list-style-type: none"> • Land Provision Letter issued by the Head of Tanjung Paku Village on April 15, 1987 and known by the Tungkal Ulu Sub-district Head. • Old maps • Letter of Agreement between Tanjung Paku Village and PT IIS dated December 1, 1999. • ED Pantation Letter No. 206/IIMS/XII/99 dated December 03, 1999 • Statement Letter from Tanjung Paku Village Community dated February 3, 2000 • PT IIS SSL Manager Letter No. 009/IIS/JBI/SSL/.../2000 dated March 6, 2000. • Power of Attorney from Tanjung Paku Villagers to their representatives dated March 7, 2000. • List of farmer members (129 people) • Letter from the Head of Tanjung Paku Village to the Regent of Tanjung Jabung Barat No. 07/LA/2008/7/004 (No date). • Proof of receipt for payment of FFB from the Tanjung Paku Village Community Garden dated March 10, 2000. • Letter from the Head of the Land Office of Tanjung Jabung Barat Regency to the Jambi Province Land Regional Office No 460-492 dated August 14, 2000 • Letter from the Head of the Land Office of Jambi Province to the Head of the Land Office of Tanjung Jabung Barat Regency No. 500-1737 dated August 30, 2000 • Letter from the Head of the Land Office of Tanjung Jabung Barat Regency to the Jambi Province Land Regional Office No 460-495 dated 6 September 2000 • Letter from the Head of the Land Office of Tanjung Jabung Barat Regency to the Jambi Province Land Regional Office No 460-671 dated October 20, 2000
	<p>Audit Team verification and response:</p> <p>The settlement of land disputes between the residents of Tanjung Paku Village and the company is ongoing and has received attention from relevant government agencies, especially the Tanjung Jabung Barat Regional Government.</p> <p>The auditor team has contacted the parties in an effort to monitor any developments in this dispute.</p>
<p>12</p>	<p>Feedbacks:</p> <p>Asmara Yunus – Ex Land Claimer Coordinator on 2000</p> <ul style="list-style-type: none"> • He is a former employee of PT IIS Tungkal Ulu who left in 1998 and re-entered into an employee in 2003 – 2014. • There are 6 villages that received KKPA, not including Tanjung Paku Village. • There was a handover of land from the Tanjung Paku village government. • At first there was a plan for the residents of Tanjung Paku Village to get the KKPA. • The KKPA lawsuit was made in 2000. • It was realized that FFB payments for an area of 107 Ha in 2000 were made twice. • The payment was stopped because there were still many other villagers who submitted claims. • There is an internal conflict regarding the method of payment of FFB proceeds
	<p>Audit Team verification and response:</p>

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	<p>Based on the information gathered from the villagers, obtain information that there was an internal issue between the Tanjung Paku peoples that makes Mr. Asmara Yunus withdrawn himself as a claimer coordinator.</p> <p>The settlement of land disputes between the residents of Tanjung Paku Village and the company is ongoing and has received attention from relevant government agencies, especially the Tanjung Jabung Barat Regional Government.</p> <p>The auditor team has contacted the parties in an effort to monitor any developments in this dispute.</p>
13	<p>Feedbacks: Village Representatives from Tanjung Pauh Village Ridwan S.Pdi – Village Secretary</p> <ul style="list-style-type: none"> • There is no land dispute issue • There is no agreement on boundaries between villages (Penyabungan, Lubuk Terap etc.) • There is a PIR-Trans program located in SP 3 and SP 8. • Communication with the company went well including social assistance. • There are no other significant issues.. <p>Audit Team verification and response: The company has managed good relationship with local communities. There is no issues on land dispute, environmental or social conflict with people of Tanjung Pauh Village.</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					

Previous land owner / user comment	
	<p>Feedbacks: NIL</p> <p>Audit Team verification and response:</p>

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 **PT Inti Indosawit Subur – Tungkal Ulu POM** has complied with the Indonesia National Interpretation 2020 of the RSPO P&C 201 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 **PT Inti Indosawit Subur – Tungkal Ulu POM** is remain certified.

Report prepared by	Acceptance of Assessment Conclusion
Name: Andi Pratama Pasaribu	Name: Putu Grhyate Yonata Aksa
Company Name: On behalf of BSI Services Malaysia Sdn. Bhd.	Company Name: PT Inti Indosawit Subur – Tungkal Ulu POM
Title: Lead Auditor	Title: Sustainability Manager
Signature: 	Signature: 
Date: 13 December 2021	Date: 13 December 2021

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>Mill and Estate: PT Inti Indosawit Subur – Tungkal Ulu has made a mechanism for request information no: AA-GL-5008.1- R1 dated on 22nd August 2011 on “Prosedur Penangan Permintaan Informasi Stakeholder”</p> <p>The company has also owned some policies for documents created by the public relations department in the company and acknowledged by plantation manager that can be accessed by public year 2019, the list comprise of 32 document, that covered:</p> <ul style="list-style-type: none"> • Legal Documents <ul style="list-style-type: none"> – a copy of SK HGU (Land Title) – a copy of AMDAL (Social and Environmental Impact Assessment) – a copy on IMB (permit to building) – a copy of Izin Lokasi Izin Prinsip – a copy of Izin Mesin Pabrik (machineries permit in Mill) • Environment Documents <ul style="list-style-type: none"> – Waste management plans – Report of waste water – Report of water management – Report of river water quality – Report of air quality. – Report of RKL (Environmental Management Plan) – RPL (Environmental Monitoring Plan). 	<p>Complied</p>

		<ul style="list-style-type: none"> - Report of Hazardous Waste - HCV assessment • Social Activity Documents • Employment Documents <ul style="list-style-type: none"> - Jamsostek and also BPJS Kesehatan - HSE management programs <p>Smallholders: Procedure Komunikasi internal Group Sertifikasi, no. 007/DOK/SOP/AA/2016. Scheme Manager cooperated with scheme smallholders has provide list of documents able to access by their stakeholders, last review in January 2019, the list comprise of 8 documents that covered, such as:</p> <ul style="list-style-type: none"> - Legal requirement: <ul style="list-style-type: none"> • Copy of land rights (SHM) • Akte Pendirian Koperasi - deed of establishment, • Tanda Daftar Perusahaan/TDP (Registered KUDs permit), - Operational document - Minute of annual meeting (RAT – cooperatives) - Agromony procedure or manual - Environmental document - Rencana Kerja KUD (KUDs budget) consist of projection FFB and operational cost), - Monitoring of IPM, fertilizing and harvesting, - Accident record and OHS Manual. <p>Onsite Audit: Based on document verification at Tungal Ulu Estate, it shows that the company has updated the list of documents and information for the public which was carried out on January 1, 2020 wherein the document</p>	
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		<p>has mentioned 34 types of documents that can be accessed by the public based on their interests, for example:</p> <ol style="list-style-type: none"> 1. The AMDAL document can be accessed by the government, the community, NGOs and the Plasma KUD. 2. HCV Identification Documents can be accessed by the government, communities, NGOs and the Plasma KUD. 3. Land acquisition documents (Location Permit, Principle Permit, IPKH, HGU Certificate) can be accessed by the government, the community and the Plasma KUD. 4. Records of the deliberation process and the results of land compensation can be accessed by the government, the community and the Plasma KUD. 5. Social SOPs (Requests for information, land conflicts, etc.) can be accessed by the government, communities, NGOs and Plasma Cooperatives. 	
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders.	<p>Onsite Audit:</p> <p>Based on document verification at Tungal Ulu Estate, it shows that the company has updated the list of documents and information for the public which was carried out on January 1, 2020 wherein the document has mentioned 34 types of documents that can be accessed by the public based on their interests, for example:</p> <ol style="list-style-type: none"> 1. The AMDAL document can be accessed by the government, the community, NGOs and the Plasma KUD. 2. HCV Identification Documents can be accessed by the government, communities, NGOs and the Plasma KUD. 	Complied

		<ol style="list-style-type: none"> 3. Land acquisition documents (Location Permit, Principle Permit, IPKH, HGU Certificate) can be accessed by the government, the community and the Plasma KUD. 4. Records of the deliberation process and the results of land compensation can be accessed by the government, the community and the Plasma KUD. 5. Social SOPs (Requests for information, land conflicts, etc.) can be accessed by the government, communities, NGOs and Plasma Cooperatives. 	
1.1.3	<p>(C) Records of requests for information and responses are maintained.</p>	<p>Mill and Estate: PT Inti Indosawit Subur – Tungkal Ulu has recorded the request of information and its response from stakeholder into a logbook "Agenda Surat Masuk" and the response is documented in "Log Book Stakeholders – Out".</p> <p>On-Site Audit: Based on document verification, it shows that PT Inti Indosawit Subur – Tungkal Ulu has documented the request for information and its responses in the "Logbook Agenda Surat Masuk" document while the responses are documented in the "Logbook Surat Keluar" document, for example:</p> <ol style="list-style-type: none"> 1. Requests for information submitted by the Regional Secretary of West Tanjung Jabung Regency through Letter No. 562/259/Naker/2021 regarding Requests for Labor Data Reports and Reports on the Impact of Covid-19 on companies. The company has responded to this request for information through Letter No. 85/Mgr-Ekt/Memo/III/2021 dated March 25, 2021, complete with attachments. 2. Requests for information submitted by the Department of Labor of Tanjung Jabung Barat Regency No. 565363/104/HI dated May 5, 	Complied

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		<p>2021 regarding the Report on the Implementation of the Granting of Religious THR. The company has responded to this request for information through letter No. 86/Mgr-Ekt/Memo/V/2021 dated 05 May 2021 complete with attachments.</p> <p>Smallholder Request of information from stakeholders is documented into logbook and available for each KUD</p> <p>Based on interviews with relevant agencies (Manpower and Environmental Services Office of West Tanjung Jabung Regency) stated that the Company has responded well to any requests for information sent by these agencies.</p> <p>Based on interviews with NGOs (WALHI Jambi and PPJ) as well as residents of Tanjung Paku Village, it was stated that communication with the company had been carried out since June 21, 2021 and for the next process to be facilitated by the Regional Government of Tanjung Jabung Barat Regency.</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>Company has developed a communication procedure under "Mekanisme Penanganan Permintaan Informasi Stakeholder "(No. SOP; AA-GL-5008.1-R1) dated 22 August 2011. The procedure described that information request can be receive by oral or written, or by representative of communities; the company will responded according to respective authorities, starts from Humas (public relation), Estate/Mill manager, Group Manager and Regional Office. The company responses against all information request sent by stakeholders including response time of 14 working days after information request accepted. In addition, record related to information request and company response kept and maintained for three (3) years.</p>	Complied

		<p>Smallholder: The Smallholder Manager has established mechanism for communication and consultation "<i>Prosedur Konsultasi dan komunikasi Didokumentasikan, Diungkap, Diimplementasikan Tersedia dan Dijelaskan Kepada Semua Stakeholder</i>" dated 16 January 2017, shaped flow Chart that describes the process of incoming information requests up to the responses provided. Responsible for the response of information from the stakeholders is done by the Field Assistant then will be arranged to the Estate Manager.</p> <p>Each smallholder member has "<i>Buku Panduan dan Catatan Petani Plasma</i>", whereas explains the flow process of consultation and communication. Both of communication by written or verbal communication to group management are acceptable.</p> <p>Onsite Audit: Based on document verification, it shows that the SOP for Requests for information has been disseminated to the surrounding village communities but is limited to ring 1 villages and does not include Tanjung Paku village, for example the socialization conducted on 7 December 2020 which was attended by 34 participants who were representatives from surrounding villages, KUD, Trade Unions, and related agencies (Plantation Service).</p>	
1.1.5	An up-to-date list of contacts and detailed stakeholder information is available along with designated representatives.	<p>Mill and Estate: PT Inti Indosawit Subur – Tungkal Ulu has prepared procedure of "Menerima dan Merespon Permintaan Informasi Stakeholder" (SOP. No.: AA-GL-5008.1-R1 dated 22 August 2011) which is manage and monitoring information request from stakeholder. The Company has also established a Matrix of Provision of Information to Stakeholders, describing the types of information that can provided to stakeholders,</p>	Complied

		<p>including legal basis, type of information and relationships with relevant agencies.</p> <p>All information requests from stakeholder will handled by relevant department, such as: CSR department responsible for inquiry from local community, media, NGO including dispute or complaint; Human Resources Department responsible for worker consultation, worker union or government authorities related to manpower/labor issue; Purchasing Department responsibility to communicate regulation's, environment's, health and safety and social's requirement to all supplier.</p> <p>PT Inti Indosawit Subur – Tungkal Ulu POM and Estate has made a list of documents that are publicly accessible recorded in "Formulir Distribusi Informasi" (Open to Public) and is updated on 5th July 2018, such as:</p> <ul style="list-style-type: none"> - Laws and regulation document: <ul style="list-style-type: none"> a. Permit and license (Izin Lokasi, Izin Usaha Perkebunan, Hak Guna Usaha, etc.) - Environmental document: <ul style="list-style-type: none"> b. AMDAL document (SEIA), c. RKL-RPL document (environmental management and monitoring report), d. Permit for temporary hazardous waste storage, e. Waste management plan, f. Environmental policy, g. HCV identification document, h. Pollution management plan etc - OHS: <ul style="list-style-type: none"> a. Program of OHS committee (P2K3) b. Report the performance of OHS program – was regularly sent to Manpower Agency per 3 months base c. OHS inspection checklist 	
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		<ul style="list-style-type: none"> - Social document: <ul style="list-style-type: none"> a. Social Impact Assessment (SIA) "Study Evaluasi Lingkungan" which covering social impact assessment, approved by Ministry Agriculture no. 220/687/B/IV/1994, b. Social program and community development program, c. Company policies <p>Smallholders: Procedure Komunikasi internal Group Sertifikasi, no. 007/DOK/SOP/AA/2016. Scheme Manager cooperated with scheme smallholders has provide list of documents able to access by their stakeholders, last review in January 2019, the list comprise of 8 documents that covered, such as:</p> <ul style="list-style-type: none"> - Legal requirement: <ul style="list-style-type: none"> • Copy of land rights (SHM) • Akte Pendirian Koperasi - deed of establishment, • Tanda Daftar Perusahaan/TDP (Registered KUDs permit), - Operational document - Minute of annual meeting (RAT – cooperatives) - Agromony procedure or manual - Environmental document - Rencana Kerja KUD (KUDs budget) consist of projection FFB and operational cost), - Monitoring of IPM, fertilizing and harvesting, - Accident record and OHS Manual. <p>Based on interviewed with the farmer and confirmed that all visitors and all requests for information are referred to the Plasma Manager Edward Hutauruk and or Askep Mr. Nirwan Ginting and Field assistant, there are 5 Field Assistant (Mr. M. Ardiansyah I.T., Mr. Rudy J., MR. M. Azan, A.Y.,</p>	
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		<p>Mr. Muh. Junaedi and Mr. Pahala, R. G.) and then forward will report to Group Manager.</p> <p>Notice board onsite contain information such as legal register, list of HCV and RTE, OSHA and environmental plan, policies and consultation and communication procedure.</p> <p>Major Non-conformities:</p> <p>The document related to details of complaints and grievances (Criterion 6.3) and continual improvement plans (Criterion 8.1) has not provided in the list of documents that are publicly accessible, which recorded in "Formulir Distribusi Informasi" (Open to Public) updated on 5 July 2018 for PT Inti Indosawit Subur – Tungkal Ulu and January 2019 for Scheme Smallholders.</p> <p>The organization has made a list of documents that are publicly accessible, recorded in "Formulir Distribusi Informasi" (Open to Public) updated on 5 July 2018 for PT Inti Indosawit Subur – Tungkal Ulu and January 2019 for Scheme Smallholders.</p> <p>However, the document related to Details of complaints and grievances (Criterion 6.3) and Continual improvement plans (Criterion 8.1) has not provided at the list of documents</p> <p>Onsite Audit: PT IIS Tungkal Ulu has updated the "List of Stakeholders" document on August 12, 2021 wherein the document describes the names of stakeholders, addresses, contact persons, email addresses, contact</p>	
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		<p>numbers, direct interests, benefits obtained and the level of influence on sustainable palm oil management. . The types of stakeholders listed consist of:</p> <ol style="list-style-type: none"> 1. International Stakeholder List: consists of 18 types of stakeholders such as RSPO, Biofuel Merchants, BSI, EDF-Man, and others. 2. National Stakeholder List: consists of 21 stakeholders such as the Ministry of Agriculture, Ministry of Trade, Ministry of Manpower etc. 3. Provincial Stakeholder List: consists of 18 stakeholders such as Jambi University, Jambi Governor, Agriculture Service, Jambi BPN Regional Office, Livestock Service, House Representatives etc. 4. Ministry of Agriculture, Ministry of Trade, Ministry of Manpower, etc. 5. Village: consists of 42 surrounding villages namely Merlung Village, Pengabungan, Lubuk Terap, Pauh Island, Rantau Benar and Rantau Badak, KUD-KUD Plasma etc. 6. Stakeholder District Agencies: consisting of 9 district level agencies such as the Plantation Service, Cooperatives and Micro, Small and Medium Enterprises Service, Land Office, Police Department of Tanjung Jabung Barat, Manpower Service, Environment Service, and One Stop Service Department of Tanjung Jabung Regency. 7. List of Stakeholders at the District level: consisting of 42 stakeholders, namely the surrounding villages, Merlung sub-district, Renah Mendalu sub-district, Muara Papalik sub-district, Merlung police, District of Army Office, Merlung Village, Penyabungan, Lubuk Terap, Pauh Island, Rantau Benar, Rantau Badak and all KUD Plasma. 8. List of other NGO/external stakeholders: consisting of NGO Equivalent, Journalists, NGOs LPPTK, SPSI, National and Political Unity Agency (Kesbangpol) Tanjung Jabung Barat Regency, Jambi 	
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		Farmers Association (PPJ) and the Indonesian Forum for the Environment (WALHI) Jambi Province.	
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>PT Inti Indosawit Subur has revised the company policy by including commitment to a code of ethical business conduct, it was signed by Managing Director on 1 December 2019. The policy has been disseminated to all employees by installing signboard of company policy and by direct dissemination, e.g.:</p> <ul style="list-style-type: none"> a. In 2020, dissemination has performed on 10 February 2020 attended by 24 personnel from Tungkal Ulu Estate. b. In 2019, dissemination has performed on 10 September 2019 attended by 32 personnel from Tungkal Ulu Estate, on 10 April 2019 attended by 72 personnel at Tungkal Ulu Plasma. List of attendance was available at the time of audit. <p>In the recruitment process policies have been applied related to business ethics, which are stipulated in the Work Agreement Letters both PHL, PKWT and in the Collective Labor Agreement (PKB).</p> <p>In the Daily worker Agreement and PKWT Work Agreement, it is also explained in relation to company policy stated in appendix 1, that is:</p> <p>Disgraceful Acts / Actions of Workers That Result in the Termination of the Work Agreement; "Committing and / or directly or indirectly involved in a fraud and / or theft and / or embezzlement of goods and / or money belonging to the company, embezzling company money, accepting gifts from other parties due to work results. "<i>Perbuatan/Tindakan Tercela Tenaga Kerja yang Mengakibatkan Berakhirnya Perjanjian Kerja; "Melakukan dan/atau terlibat langsung maupun tidak langsung dalam suatu penipuan dan/atau pencurian dan/atau penggelapan barang</i></p>	Complied

		<p><i>dan/atau uang milik perusahaan, Menggelapkan uang milik perusahaan, menerima uang pemberian dari pihak lain karena hasil kerja".</i></p> <p>At the recruitment process has been applied policy related to business ethics and also set forth in the letter of the work agreement both PHL, PKWT and in PKB.</p> <p>In the daily freelance work agreement and the PKWT work agreement, it is also explained in relation to the company policy stated in Appendix 1; Occupational action/actions that resulted in the expiration of the employment agreement; "Doing and/or engaging directly or indirectly in a fraud and/or theft and/or embezzlement of the company's goods and/or money, darkening the company's money, terrorize the awarding of the other party due to work</p> <p>PKB period 2018-2020 has explained related to business ethics in article XXII about "Obligations of The Company and Employees"; including: employers and workers are obliged to maintain good character and do not contradict the legal norms and moral values, employers and workers are obliged to comply with and enforce all regulations and legislation on Applicable employment.</p> <p>Smallholder: 2020</p> <p>The Smallholder Manager already has a Code of Ethical Business Policy that included on "<i>Kebijakan Manajer Group ICS</i>" signed on 11 August 2020, and has been disseminated to each member through the "Kegiatan Refresh Pelatihan P&C RSPO" was performed on 11 August 2020 attended by 83 farmers where in point 2 stated "<i>Committed to ethical conduct in business in overall transactions and business operations, prohibition all forms of corruption, bribery and fraud in the use of funds and resources</i>".</p>	
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		<p>Separately, the policy of the business code of conduct is stated in the cooperation contract with the second party. Statements relating to business ethics are mentioned in Article 8; About Prohibition: that: The owner of the fleet (Transporter) is charged with fraud, theft and embezzlement of FFB.</p>	
<p>1.2.2</p>	<p>A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.</p>	<p>Tungkal Ulu Group including scheme smallholder has mechanism regarding reporting guarantees and case disclosures; from the case report referring to procedure AA-GL/510.1-R0, Public Relations will convey the information to GM and keep the reporting party confidential. GM and Public Relations provide a maximum response of 14 days for a whistle-blower case referring to the related procedure: refer to the AA-GL-5009.1 R0 procedure for settlement with the local community and resolution of employee complaints related to employment referring to the AA-HR-308.5-R0 procedure. This mechanism has been disseminations on 10 February 2020.</p> <p>To ensure that the policy has been implemented by all related parties, PT IIS – Tungkal Ulu has a monitoring mechanism through internal audit actions every year. The last internal audit was conducted on 4-14 May 2020 by 4 auditors who have competency as internal auditors. From the results of the internal audit, there are no discrepancies related to the implementation of company policies.</p> <p>The Company - Tungkal Ulu Group (including scheme smallholder) has implemented business conduct policy to seluruh employees, it is repeated an in employment contract with PKB employees period 2018-2020. Describes on article XXII about “<i>Kewajiban Perusahaan dan Pekerja</i>”; these included: <i>Pengusaha dan pekerja berkewajiban memelihara budi pekerti yang baik dan tidak bertentangan dengan norma hukum dan</i></p>	<p>Complied</p>

		<p><i>nilai susila, Pengusaha dan pekerja berkewajiban mematuhi dan menjalankan segala peraturan dan perundangan tentang ketenagakerjaan yang berlaku”.</i></p> <p>At the recruitment process has been applied policy related to business ethics and also set in the letter of the work agreement both PHL, PKWT and in PKB.</p> <p>In the daily worker agreement and the PKWT work agreement, it is also explained in relation to the company policy stated in Appendix 1; Occupational action/actions that resulted in the expiration of the employment agreement; "Doing and/or engaging directly or indirectly in a fraud and/or theft and/or embezzlement of the company's goods and/or money, darkening the company's money, terrorize the awarding of the other party due to work.</p>	
<p>Principle 2: Operate legally and respect rights</p>			
<p>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>			
<p>2.1.1</p>	<p>(C) The unit of certification complies to relevant regulations.</p>	<p>Mill and Estate:</p> <p>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, sample seen:</p> <ul style="list-style-type: none"> - Izin Prinsip (Principle permit) No. KB.320/859/ Mentan/XI/1983, dated 7 November 1983, approved by Agriculture Ministry for PT. IIS – PIR Trans (+ 65,000 ha) and Izin Lokasi No.746, year 2006 for 1,111 ha in Kecamatan Merlung, Kabupaten Tanjung Jabung Barat, issued by Bupati Tanjung Jabung Barat. - Izin Usaha Perkebunan – Surat Pendaftaran Usaha Perkebunan/SPUP (Plantation Operational permit) 	<p>Complied</p>

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		<p>No.187/Mentanhut/VII/2000, dated 3 November 2000 ($\pm 4,759.20$ ha).</p> <ul style="list-style-type: none"> - Izin Usaha Perkebunan Budidaya/IUP B (Plantation operational permit) No.625, year 2008, dated 26 September 2008 ($\pm 1,111$ ha). - Forest area release through "Surat Keputusan Menteri Kehutanan No.494/Kpts-II/1991 tentang Pelepasan areal hutan seluas 17,500 Ha terletak di Kelompok Hutan S. Lampisi-S. Palik-palik - Kabupaten Dati II Tanjung Jabung dan Seluas 9,356Ha terletak di Kelompok Hutan S. Kehidupan-S. Singoan, Kabupaten Batanghari, Provinsi Jambi untuk Usaha Budidaya perkebunan dengan pola PIR-TRANS atas nama PT. Inti Indosawit Subur" dated 7 August 1991. - Renewal HGU No.61/HGU/BPN/2005, dated 2 June 2005, approved by BPN (3,503.02 ha). - HGU No.82/HGU/BPN RI/2014, dated 15 May 2014 (1,053.34 ha). - Land Application Permit: No.503.8/01/KPPT/2012 dated 17 September 2013. - Surface water use permit No.503.30/01/KPPT/2011, dated 5 July 2011. - Pesticide Store permit No.560/386/4.3/ DSTKT. - Izin operational pabrik (Mill operation permit) No.532/T/Industri/2005 <p>Smallholder:</p> <p>Plasma management of Tungkal Ulu conducted the evaluation of laws and regulation compliance each year. Latest updated was on 29 March 2019. During audit, Group manager can demonstrated the document of "Evaluasi Kepatuhan Hukum Kebun Plasma Tungkal Ulu Tahun 2019" which contain the list/'legal register' of all applicable laws and regulations; consist of: list of regulation, requirement, evaluation record,</p>	
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		<p>compliance status, type of document, no. document, validity, source of document, remark. For example:</p> <ul style="list-style-type: none"> • Cooperative establishment deed • Private land title • Environmental permit • Palm oil cultivation permit <p>Onsite Audit:</p> <p>Based on interviews with relevant agencies (Environmental Service, Manpower Office, West Tanjung Jabung Regency Plantation Service) stated that there were no indications of violations of laws and regulations, for example:</p> <ol style="list-style-type: none"> 1. Employment-related regulations: The company has implemented the Tanjung Jabung Barat Regency Minimum Wage in 2021, the workforce has been included in the BPJS-Health and BPJS Employment programs, Mandatory labor reports have been submitted in a timely manner, have a Collective Labor Agreement, there are Labor Union etc. 2. Environmental-related regulations: The company already has an Environmental Permit, a Land Application Permit, a LB3 Temporary Storage Permit (TPS LB3) including routine reports to the Tanjung Jabung Barat Regency Environmental Service. 3. Regulations related to OHS: The company has compiled the HIRAC document and consistently updates it, the company has prepared an Occupational Safety and Health Committee (P2K3), the company has provided Health facilities and Personal Protective Equipment (PPE) for employees according to the type of work in accordance with the recommendations in HIRAC, has provided emergency response facilities. 	
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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 is on February 2021. 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.	<p>According to the national regulation, land title (HGU) holder shall maintain the condition of boundary poles. Based on field visit in Tungkal Ulu Estate concluded that the boundary poles area well maintained. For example:</p> <table border="1" data-bbox="1133 855 1966 1174"> <thead> <tr> <th>ID HGU pole</th> <th>Location</th> </tr> </thead> <tbody> <tr> <td>BPN/IIS No.07</td> <td>Block E93D, boundary with Pulau Pauh Village.</td> </tr> <tr> <td>BPN/IIS No.28</td> <td>Block E93J, boundary with Pulau Pauh Village.</td> </tr> <tr> <td>BPN/IIS No.06</td> <td>Block E93D, boundary with Pulau Pauh Village.</td> </tr> <tr> <td>BPN/IIS No.05</td> <td>Block E93C, boundary with Pulau Pauh Village.</td> </tr> <tr> <td>BPN/IIS No.02</td> <td>Block E93D, boundary with Pulau Pauh Village.</td> </tr> </tbody> </table> <p>According to the boundary poles monitoring record that conduct on 8 – 11 June 2021, all the boundary poles area in place.</p>	ID HGU pole	Location	BPN/IIS No.07	Block E93D, boundary with Pulau Pauh Village.	BPN/IIS No.28	Block E93J, boundary with Pulau Pauh Village.	BPN/IIS No.06	Block E93D, boundary with Pulau Pauh Village.	BPN/IIS No.05	Block E93C, boundary with Pulau Pauh Village.	BPN/IIS No.02	Block E93D, boundary with Pulau Pauh Village.	Complied
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Criteria 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.

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2.2.1	A list of contracted parties is available.	<p>The company has had several existing contracts related to third parties as follows:</p> <ol style="list-style-type: none"> 1. CV Teman Setia (CPO/PK/CPKO Transporter) 2. CV Jaya Pertama (CPO/PK/CPKO Transporter) 3. CV Jaya Bersama (CPO/PK/CPKO Transporter) 4. PT Buana Jaya Bersama (CPO/PK/CPKO Transporter) 5. CV Jasa Sumber Asahan (CPO/PK/CPKO Transporter) 6. CV Jasa Sahabat Abadi (CPO/PK/CPKO Transporter) 7. CV Sumber Kencana (CPO/PK/CPKO Transporter) 8. Jaya Baru (EFB Transporter) 9. PT. Sumber Kencana Inhu <p>Onsite Audit: Certificate holder has listed the contracted parties. The list of third parties as per September 2021 as follows:</p> <table border="1" data-bbox="1137 959 1966 1347"> <thead> <tr> <th>Unit</th> <th>Contractors name</th> <th>Job type</th> <th>Address Contact person</th> <th>Contract status</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Estate</td> <td>PT Hazmat Techno Indonesia</td> <td>Hazardous waste collector</td> <td>Jamie – Medan</td> <td>Active</td> </tr> <tr> <td>PT Trindo Jaya Pasifik</td> <td>Replanting</td> <td>Wanto – Jambi</td> <td>Active</td> </tr> <tr> <td>Mill</td> <td>PT Pelita</td> <td>CPO/CPKO transporter</td> <td>Fitri – Jambi</td> <td>Active</td> </tr> </tbody> </table>	Unit	Contractors name	Job type	Address Contact person	Contract status	Estate	PT Hazmat Techno Indonesia	Hazardous waste collector	Jamie – Medan	Active	PT Trindo Jaya Pasifik	Replanting	Wanto – Jambi	Active	Mill	PT Pelita	CPO/CPKO transporter	Fitri – Jambi	Active	Complied
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		<table border="1" data-bbox="1144 362 1966 443"> <tr> <td data-bbox="1144 362 1263 443"></td> <td data-bbox="1263 362 1451 443">PT Trans Jaya Pertama</td> <td data-bbox="1451 362 1644 443">CPO/CPKO transporter</td> <td data-bbox="1644 362 1816 443">Nanda – Jambi</td> <td data-bbox="1816 362 1966 443">Active</td> </tr> </table> <p data-bbox="1133 496 1977 560">Based on interview with general manager and head clerk obtained information that the list of third parties updated in a monthly basis.</p>		PT Trans Jaya Pertama	CPO/CPKO transporter	Nanda – Jambi	Active	
	PT Trans Jaya Pertama	CPO/CPKO transporter	Nanda – Jambi	Active				
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 data-bbox="1133 612 1541 639">FFB supplier from local contractor:</p> <ol data-bbox="1133 660 1469 1142" style="list-style-type: none"> 1. KUD Bina Usaha SP 1, 2. YES, 3. KSP, 4. HD, 5. Victory, 6. Trading Makmur, 7. Jaya Mandiri, 8. Merlung Topaz, 9. MH, 10. Gapoktan Maju Jaya, 11. Penyabungan Topaz, 12. Gapoktan Usaha Berkat, 13. Asosiasi Tani Bersama, 14. Novie Zulhi, 15. Teguh Prayoga. <p data-bbox="1133 1195 1977 1353">According to Asian Agri’s policy regarding to traceability, they has conducted traceability project to verify their supply chain. Refer to 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>	Complied					

		<p><i>"Asian Agri reinforced its commitment to traceability by engaging Meo Carbon Solution from Germany and SNV from The Netherlands as traceability consultants to assist with our supply chain traceability project. Commencing in October 2018, Asian Agri began supply chain traceability projects in North Sumatra and Riau. These projects complement the first traceability verification programmes for our partner independent smallholders in Jambi Province which began in 2016 and were done in collaboration with IDH and Yayasan SETARA Jambi. These ongoing projects will eventually provide us with recommendations on how to further improve our systems and procedures for a more traceable and responsibly supply chain".</i></p> <p>Onsite Audit:</p> <p>Based on document verification of third party contract (EFB and decanter cake transporter) on behalf of Penyabungan Topaz obtained information that the contract contain specific clause as follows:</p> <ul style="list-style-type: none"> • Name and personal address both parties, date and kind of agreement. • Scope of agreement • Requirement • Duration • Detail of agreement • Price • Payment method • Measurement • Responsibilities • Contractor Guarantee 	
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		<p>(covering statement to follow company procedure, registered their workers in worker insurance program, PPE usage, no child labour and other environmental procedures)</p> <ul style="list-style-type: none"> • Sanction • End of agreement terms • Force majeure • Manipulation and bribery • Addendum • Court settlement • Signed both parties 	
2.2.3	All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour.	<p>PT. Inti Indosawit Subur – Tungkal Ulu POM has a procedure to communicate and evaluate the source of third party FFB (non-certified) as on "SOP Pembelian TBS Luar No. AA- MM-506.1-R3) dated 19 December 2018. The objective of the procedure was to ensure third party FFB sourced from non-forest area, completed with legal ownership of the land. The procedure consist of various steps: to check supporting document from supplier (delivery order, declaration, plantation block maps); compare the plantation location map/coordinate against the legal documents; verification team will compare the plantation location map against the spatial mapping; conduct field verification to the source of FFB (oil palm plantation belong to farmer), randomly selected samples; verification team will prepare database, prepare the list the complying suppliers. Supply of FFB from area which legally contested or coming from protected forest, forest area, conservation area – will be rejected.</p> <p>The third party FFB supplier has signed documented statement and guarantee - "Pernyataan dan Jaminan", as a supplier of FFB. The documents stipulated:</p>	Complied

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		<ul style="list-style-type: none"> • Farmer group willingly provide GPS coordinate on the source of FFB plantation/location; • FFB supplied does not originate from unauthorized areas, such as forest area or area prohibited to be planted with oil palm, not limited to: • Protected Forest Area – Tesso Nilo National Park, Bukit Tiga Puluh National Park, Bukit Kusuma National Park; • Industrial Forest Area; • Production Forest Area – including “Hutan Produksi Tetap (HP)”, “Hutan Produksi Terbatas (HPT)”, Hutan Produksi Konversi (HPK)”; • Conservation Area; • The FFB supplied not from Scheme Smallholder of PT. Inti Indosawit Subur – Tungkal Ulu; • The FFB supplied not from rejected FFB out of PT. Inti Indosawit Subur – Tungkal Ulu POM; • The FFB supplied does not originated from from stealing and/or obtained by violating laws. • The FFB supplied does not originated from new planting which converting forest land and/or peat land after September 2014; • The FFB supplied does not originated from conflicted/disputed land; • The supplier does not conduct land burning during land preparation and replanting; • The supplier does not employed children under 18 years old; the supplier pays the worker in accordance to provincial or regency minimum wage; <p>Onsite Audit: Based on interview with CSV staff obtained information that the agreement with the contactor has been comply with the specific clauses related to disallowing child labor, forced or trafficked labor. Sighted the</p>	
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		contract between the company with PT Trinindo Jaya Abadi (replanting contractor) and Penyabungan Topaz (FFB Supplier).																																	
Criteria 2.3: All FFB supplies from outside the unit of certification are from legal sources.																																			
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; If relevant, valid planting/operational/trading license, or is part of a cooperative which allows the buying and selling of FFB. 	<p>As stated in sustainability reports of Asian Agri stated that "<i>Asian Agri reinforced its commitment to traceability by engaging Meo Carbon Solution from Germany and SNV from The Netherlands as traceability consultants to assist with our supply chain traceability project. Commencing in October 2018, Asian Agri began supply chain traceability projects in North Sumatra and Riau. These projects complement the first traceability verification programmes for our partner independent smallholders in Riau Province which began in 2016 and were done in collaboration with IDH and Yayasan SETARA Jambi. These ongoing projects will eventually provide us with recommendations on how to further improve our systems and procedures for a more traceable and responsibly supply chain</i>".</p> <p>Tungkal Ulu POM receives FFB from its own estate, smallholders scheme, out grower and assisted independent smallholders. For directly sources FFB Tungkal Ulu POM has collect the information regarding the geolocation, proof of ownership status, trading licence and other relevant information including contract. Below are the sample information of directly source FFB:</p> <table border="1"> <thead> <tr> <th rowspan="2">FFB Sources</th> <th colspan="2">Coordinate Geolocation</th> <th rowspan="2">Hectare (ha)</th> <th rowspan="2">Land Certificate</th> </tr> <tr> <th>Longitude</th> <th>Latitude</th> </tr> </thead> <tbody> <tr> <td>MERLUNG TOPAZ</td> <td>1°15'90.6" S</td> <td>103°03'39.3" E</td> <td>190</td> <td>SHM</td> </tr> <tr> <td>MULIYANA HIDAYATI</td> <td>1°16'08.3" S</td> <td>103°03'6.47" E</td> <td>1055</td> <td>SHM</td> </tr> <tr> <td>GAPOKTAN MAJU JAYA</td> <td>1°16' 38.75" S</td> <td>102° 54' 33.15" E</td> <td>1294</td> <td>SHM</td> </tr> <tr> <td>PENYABUNGAN TOPAZ</td> <td>1°16'35.7" S</td> <td>103°00'11.0" E</td> <td>371</td> <td>SHM/SKT</td> </tr> <tr> <td>NOVIE ZULHI</td> <td>1°18'19.20" S</td> <td>103°3'5.05" E</td> <td>2675.43</td> <td>SHM</td> </tr> </tbody> </table>	FFB Sources	Coordinate Geolocation		Hectare (ha)	Land Certificate	Longitude	Latitude	MERLUNG TOPAZ	1°15'90.6" S	103°03'39.3" E	190	SHM	MULIYANA HIDAYATI	1°16'08.3" S	103°03'6.47" E	1055	SHM	GAPOKTAN MAJU JAYA	1°16' 38.75" S	102° 54' 33.15" E	1294	SHM	PENYABUNGAN TOPAZ	1°16'35.7" S	103°00'11.0" E	371	SHM/SKT	NOVIE ZULHI	1°18'19.20" S	103°3'5.05" E	2675.43	SHM	Complied
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		<table border="1"> <tr> <td>HASBULLAH</td> <td>1° 19'22.27" S</td> <td>102° 53'24.46" E</td> <td>3803.5</td> <td>SHM</td> </tr> <tr> <td>KUD BINA USAHA (SP 1)</td> <td>1° 20' 44.80" S</td> <td>102° 54' 42.73" E</td> <td>1099.9</td> <td>SHM/SKT</td> </tr> <tr> <td>KELOMPOK TANI DIKI</td> <td>1°11'12.42" S</td> <td>103°4'29.29" E</td> <td>184</td> <td>SHM/SKT</td> </tr> </table> <p>Proof of ownership status in the form of land certificate and trading licence for each directly FFB supplier above can be shown during audit.</p>	HASBULLAH	1° 19'22.27" S	102° 53'24.46" E	3803.5	SHM	KUD BINA USAHA (SP 1)	1° 20' 44.80" S	102° 54' 42.73" E	1099.9	SHM/SKT	KELOMPOK TANI DIKI	1°11'12.42" S	103°4'29.29" E	184	SHM/SKT								
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2.3.2	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>For Indirectly sources FFB Tungkal Ulu POM also has collect the information regarding the geolocation, proof of ownership status, trading licence and other relevant information including contract. Below are the sample information of indirectly source FFB:</p> <table border="1"> <thead> <tr> <th rowspan="2">FFB Sources</th> <th colspan="2">Coordinate Geolocation</th> <th rowspan="2">Hectare (ha)</th> <th rowspan="2">Land Certificate</th> </tr> <tr> <th>Longitude</th> <th>Latitude</th> </tr> </thead> <tbody> <tr> <td>YES</td> <td>1° 00' 22.86" S</td> <td>102° 51' 11.17" E</td> <td>555</td> <td>SHM/SKT</td> </tr> <tr> <td>KSP</td> <td>1° 17' 46.7" S</td> <td>102° 56' 00.4" E</td> <td>228.5</td> <td>SHM/SKT</td> </tr> <tr> <td>Jadinson Purba</td> <td>1° 14'40.4"S</td> <td>103° 2' 2.59" E</td> <td>100</td> <td>SHM</td> </tr> </tbody> </table> <p>Proof of ownership status in the form of land certificate and trading licence for each directly FFB supplier above can be shown during audit.</p>	FFB Sources	Coordinate Geolocation		Hectare (ha)	Land Certificate	Longitude	Latitude	YES	1° 00' 22.86" S	102° 51' 11.17" E	555	SHM/SKT	KSP	1° 17' 46.7" S	102° 56' 00.4" E	228.5	SHM/SKT	Jadinson Purba	1° 14'40.4"S	103° 2' 2.59" E	100	SHM	Complied
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<p>Principle 3: Optimise productivity, efficiency, positive impact and resilience Implement plans, procedures and systems for continuous improvement.</p>																									
<p>Criteria 3.1: There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.</p>																									
3.1.1	(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>Certificate holder has provided longterm management plan in document <i>Rencana Usaha PT Inti Indosawit Subur 2020 – 2025</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 • Hectare statement of mature and immature area • Trends of production period 2007 – 2019 	Complied																						

		<ul style="list-style-type: none"> • Production per planting year. • OER/KER trends (actual period 2013 – 2019) • Extraction projected period 2020 – 2025 • Mill and estate cost (estimation). • Replanting program. • Estimation of FFB purchase (for Mass Balance Mill) • Estimation of price (IDR/Tonnes) • Estimation of profit (IDR) <p>Through the document, the production and profit of PT Inti Indosawit Subur was projected to increased.</p> <p>During the audit, Tungkal Ulu POM has had average extraction for CPO (21.18%) and KER (5.51%) in 2020. Even though the FFB production was not met the target, the OER and KER was higher (OER 20.92% and KER 5.40%). In 2021, certificate holder has set production of FFB 280,151 MT with OER 20.49% (OER) and 5.35% (KER).</p> <p>Based on interview with management representative obtained information that certificate holder has had new engagement with the scheme smallholder for the second cycle of planting.</p> <p>Onsite Audit:</p> <p>Within 2020, Tungkal Ulu POM achievement has had average extraction (FFB from own estate, smallholders and outsiders) for CPO (20.47%) and KER (5.35%). Even though the FFB production was not met the target, the OER and KER was lower (OER 21.18% and KER 5.40%). In 2021, certificate holder has set production of FFB 230,095 MT with OER</p>	
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		<p>21.18% (OER) and 5.29% (KER). According to the unit management explanation, unachieved target due to more than 50% FFB comes from new mature area with low extraction rate.</p> <p>To demonstrate the company's financial performance, a public accountant audit report no. 01543/2.1032/AU.1/01/0698-5/1/VI/2021 dated 18 June 2021 conducted by the public accounting firm Purwantono, Sungkoro & Surja (Registered Public Accountants KMK No. KMK-603/KM.1/2015 - a member firm of Ernst & Young Global Limited). In the report, the auditor expresses an opinion that the financial statements are fairly presented, in all material respects, the financial position of PT Inti Indosawit Subur as of December 31, 2020, as well as its financial performance and cash flows for the year then ended, in accordance with Indonesian Financial Accounting Standards.</p> <p>In addition, the company also shows evidence of its financial ability in paying taxes. One of them, receipt of "<i>Pajak Bumi dan Bangunan</i>" (land and building tax) period of 2020 that paid on 11 November 2020.</p>	
3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available.	<p>Own Estate</p> <p>According to the long-term management plan period 2020 – 2024, certificate holder has had annual replanting program as follows:</p> <ul style="list-style-type: none"> • 2020: 567 Ha • 2021: 552 Ha • 2022: 667 Ha • 2023: 630 Ha • 2024: 252 Ha 	Complied

		<p>Smallholder</p> <p>According to the smallholder projection 2020 – 2025 obtained the replanting estimation as follows:</p> <ul style="list-style-type: none"> • 2020: 567 Ha • 2021: 552 Ha • 2022: 667 Ha • 2023: 630 Ha • 2024: 252 Ha <p>During remote audit, obtained information that replanting activity is in process. There was no fire usage during that process.</p> <p>Onsite Audit:</p> <p>There is no change information since the remote audit.</p>	
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>Certificate holder usually set the annual report.</p> <p>Those documents will bring into annual management review meeting (usually on February). The result of the meeting will record as continuous improvement in operational activities next year.</p> <p>During the audit, annual report of 2019 still in preparation for annual management review meeting.</p> <p>Onsite Audit</p> <p>Visit Agronomi Tungkal Ulu Estate:</p>	Complied

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		<p>Sighted Report of Visit Advisory (VE) dated 2 – 7 March 2020. There are no main issues during this visit.</p> <p>VE Tungkal Ulu POM:</p> <p>Sighted Report of Visit Engineering (VE) dated 29 August 2020. The corrective action plan was on progress.</p> <p>All the issues have been corrected by management unit.</p>	
<p>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.</p>			
<p>3.2.1</p>	<p>(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>	<p>Certificate holder has had continuous improvement for 2020 that has been implemented. For example:</p> <ul style="list-style-type: none"> • According to Memorandum of Deputy Managing Director dated 22 October 2019 related to paraquat substitution obtained information that Asian Agri's no longer used paraquat since 15 November 2019. Those active ingredients substituted with isopropyl amine glyphosate and metal metsulfuron or both combinations. • Modification of axle repair tools to minimize risk of accident and reducing repair time. • Based on interview with management representative obtained information that certificate holder has had new engagement with the scheme smallholder for the second cycle of planting. Sighted new Memorandum of understanding between PT Inti Indosawit Subur with KUD Karya Jaya according to Memorandum of Understanding No. 110/KUD-KJ/BH/2019 & No. 02/SPJ/LEG-IIS/X/19 that was signed on 22 November 2019. 	<p>Complied</p>

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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>Based on explanation of management representatives, until audit finish the RSPO Metric Template still not finalized. Certificate holder only submit their ACOP's.</p> <p>In accordance with ACOP 2019, certificate holder has been submitted the ACOP report to the RSPO secretariat on 4 June 2020. According to the report, certificate holder has a program to supporting independent smallholder groups.</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>Own Estates</p> <p>Estate has had Standard Operational Procedures (SOP) that covering entire operational activity as follows:</p> <ol style="list-style-type: none"> 1. SOP AA-APM-OP-1100.01-R4 dated 5 September 2016: <i>Pembibitan</i> (Nursery). 2. SOP AA-APM-OP-1100.02-R3 dated 10 June 2015: <i>Penanaman Areal Baru</i> (New Planting). 3. 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); 4. SOP AA-APM-OP-1100.04-R3 dated 7 Decemeber 2015: <i>Pembuatan dan Pemeliharaan Parit</i> (Drainage Construction and Maintenance). 5. SOP AA-APM-OP-1100.05-R3 dated 23 November 2016: <i>Konservasi Tanah dan Air</i> (Soil & Water Conservation). 6. SOP AA-APM-OP-1100.06-R6 dated 16 February 2017: <i>Menanam kacang</i> (Planting cover crops). 7. SOP AA-APM-OP-1100.07-R6 dated 16 February 2017: <i>Menanam Kelapa Sawit</i> (Planting Oil Palms). 8. SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i> (Weed control). 	Complied

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		<p>9. SOP AA-APM-OP-1100.09. R5 dated 26 December 2018: <i>Pemupukan</i> (Fertilizer application).</p> <p>10. SOP AA-APM-OP-1100.10. R6 dated 23 November 2016: <i>Pengendalian Hama dan Penyakit</i> (Pests & Disease Control).</p> <p>11. SOP AA-APM-OP-1100.11. R1 dated 1 February 2009: <i>Pestisida dan Pengendaliannya</i> (Pesticide Handling).</p> <p>12. 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.</p> <p>13. SOP AA-APM-OP-1100.13. R3 dated 4 March 2016: <i>Tunas Pokok</i> (Pruning).</p> <p>14. SOP AA-APM-OP-1100.14. R3 dated 16 February 2017: <i>Sensus dan Identifikasi Pokok</i> (Census and Palm Identification).</p> <p>15. SOP AA-APM-OP-1100.15. R2 dated 1 October 2010: <i>Sensus Produksi</i> (Production Census).</p> <p>16. SOP AA-APM-OP-1100.16. R1 dated 1 February 2009: <i>Konsolidasi Pohon Tumbang</i> (Provision of Support to Fallen Palm).</p> <p>17. SOP AA-APM-OP-1100.17. R1 dated 23 October 2014: <i>Pengelolaan Air</i> (Water Management).</p> <p>18. SOP AA-APM-OP-1100.18.R3 dated 20 April 2015: <i>Potong Buah</i> (Harvesting).</p> <p>19. SOP AA-APM-OP-1100.19.R1 dated 1 February 2009: <i>Pengelolaan Transport</i> (FFB Transport).</p> <p>20. SOP AA-APM-OP-1100.20-R6 dated 1 May 2019: <i>Peremajaan</i> (Replanting).</p> <p>Tungkal Ulu 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; 	
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		<ol style="list-style-type: none"> 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</i> dan Pengempaan 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>; 10. SOP AA-MPM-OP-1400.11-R1 dated 1 February 2009: <i>Stasiun Water Treatment</i>; 11. SOP AA-MPM-OP-1400.12-R1 dated 1 February 2009: <i>Laboratorium</i>; 12. SOP AA-MPM-OP-1400.13-R1 dated 1 February 2009: <i>Stasiun Pengelolaan Limbah</i> for Palm Oil Mill Effluent Treatment; 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; 14. SOP AA-MPM-OP-1400.15-R1 dated 1 February 2009: <i>Perawatan</i> for Preventive Maintenance; 15. SOP AA-MPM-OP-1400.19.R2 dated 1 September 2011: <i>Manajemen dan Metode Menghitung Emisi Gas Rumah Kaca (GHG)</i> 16. SOP AA-MPM-OP-1400.18-R4 Book Keeping 17. AA-MPM-OP-1400.17-R6 Traceability <p>Those documents above are available in each unit.</p>	
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		<p>Scheme Smallholder:</p> <p>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 • 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</i> (Stamp) • 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 	
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		<ul style="list-style-type: none"> AA-HR-305.2-RO <i>Rekrutmen dan Seleksi Karyawan</i> (Recruitment and Selection of Employee). 	
3.3.2	A mechanism to check consistent implementation of procedures is in place.	<p>Visit Agronomi Tungkal Ulu Estate: Sighted Report of Visit Advisory (VE) dated 2 – 7 March 2020. There are no main issues during this visit.</p> <p>VE Tungkal Ulu POM: Sighted Report of Visit Engineering (VE) dated 29 August 2020. The corrective action plan was on progress.</p> <p>All the issues have been corrected by management unit.</p>	Complied
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.</p> <p>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 shall be 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>			

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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.	There is no new planting within certified area of PT Inti Indosawit Subur – Tungkal Ulu Estate and Tungkal Ulu Plasma after November 2005. Currently, replanting activities still in progress. Original year of Planting for Tungkal Ulu Estate are 1990, 1991, 1993 and 2003. Wilst year of Planting for Tungkal Ulu Plasma are 1990, 1991, 1992, 1993 and 1994. This indicator is not applicable.	Not Applicable
3.4.2	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.	There is no new planting within certified area of PT Inti Indosawit Subur – Tungkal Ulu Estate and Tungkal Ulu Plasma after November 2005. Currently, replanting activities still in progress. Original year of Planting for Tungkal Ulu Estate are 1990, 1991, 1993 and 2003. Wilst year of Planting for Tungkal Ulu Plasma are 1990, 1991, 1992, 1993 and 1994. This indicator is not applicable.	Not Applicable
3.4.3	(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in participatory way.	There is no new planting within certified area of PT Inti Indosawit Subur – Tungkal Ulu Estate and Tungkal Ulu Plasma after November 2005. Currently, replanting activities still in progress. Original year of Planting for Tungkal Ulu Estate are 1990, 1991, 1993 and 2003. Wilst year of Planting for Tungkal Ulu Plasma are 1990, 1991, 1992, 1993 and 1994. This indicator is not applicable.	Not Applicable
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 workers and their representatives in accordance with the applicable regulation.	<p>Estate and Mill</p> <p>Recruitment process was documented in Procedure: AA-HR-305.2-R0 dated 1 February 2009 – Recruitment and Selection stated that Staff recruitment conduct by Head Office in Jakarta. For workers in site, recruitment processes conduct by Site Management with approval from company management. This procedure has been communication to all workers in workplace on 20 June 2020 attended by 26 participants.</p> <p>Equal opportunity policy is stated in "<i>Kebijakan Perusahaan</i>" set on 1 December 2019 in Medan which has been ratified by the Managing</p>	Complied

		<p>Director (Kevin Tio); <i>"Company Treats employees fairly, whether in terms of acceptance, judgment, conditions and work environment, and representation irrespective of race, tribe, caste, national origin, religion/faith, disability, gender, sexual orientation, union membership, political affiliation and/or age"</i>. This policy has been informed to all employees and being placed into noticed board in public area and easily accessed.</p> <p>Sample taken:</p> <ul style="list-style-type: none"> • Recruitment of employees on September 14, 2019 on behalf Arikin. • Recruitment of employees on September 13, 2019 on behalf Hotman Pardam Damanik. • Memorandum No. 024/HR-RO3/MEMO/SK/03/2020 on 12 March 2020, promotion on behalf of Arikin (Tungkal Ulu Estate) become a permanent employee (SKU-H) effective April 1, 2020. • Memorandum No. 017/HR-RO3/MEMO/SK/03/2021 on 22 March 2021, promotion on behalf Rahmat Tulla Nasutian (Tungkal Ulu Estate) become a permanent employee (SKU-H) effective 1 April 2021. • Memorandum No. 011/HR-RO3/MEMO/SK/03/2021 on 15 March 2021, promotion on behalf M. Rizki Aditiya (Tungkal Ulu Estate) become a permanent employee (SKU-H) effective 1 April 2021. • Memorandum No. 013/HR-RO3/MEMO/SK/03/2021 on 15 March 2021, promotion on behalf Jupriadi (Tungkal Ulu Estate) become a permanent employee (SKU-H) effective 1 April 2021. • Memorandum No. 014/HR-RO3/MEMO/SK/03/2021 on 15 March 2021, promotion on behalf Ardiansyah (Tungkal Ulu Estate) become a permanent employee (SKU-H) effective 1 April 2021. 	
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		<ul style="list-style-type: none"> • Memorandum No. 0178/HR-RO3/MEMO/SK/08/2021 on 23 August 2021, promotion on behalf M. Riduan Sapii (Tungkal Ulu POM) become a permanent employee (SKU-H) effective 1 September 2021. • Memorandum No. 0177/HR-RO3/MEMO/SK/08/2021 on 23 August 2021, promotion on behalf Ridwan Yuna Permadi (Tungkal Ulu POM) become a permanent employee (SKU-H) effective 1 September 2021. • Memorandum No. 0179/HR-RO3/MEMO/SK/08/2021 on 23 August 2021, promotion on behalf Rahmad Daniel (Tungkal Ulu POM) become a permanent employee (SKU-H) effective 1 September 2021. <p>Smallholder</p> <p>Based on document sampled verification at KUD Sawit Kita, KUD Karya Kita, KUD Karya Jaya, KUD Panca Mukti, KUD Sari Bumi, KUD Sawit Mulia, there is no forced labor or trafficked labor allowed.</p> <p>Most of the smallholders are managed their land independently. All of the workers are considered as casual workers. The workers are hired based on verbal agreement related to rate per piece of work, payment system, working tool provision, etc. No work performed based on debt bond.</p>	
3.5.2	Employment procedures are implemented and records are maintained.	Company has a Procedure No. SOP AA-HR-305.2-RO regarding " <i>Rekrutmen dan Seleksi Karyawan</i> " and Procedure " <i>Mekanisme Penerimaan Karyawan</i> " at Plasma are based on skill, work experiences, and job evaluation. 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.	Complied

		<p>The labor union and workers have understood these procedures and they also said that recruitment and promotion process has been done without any indication discrimination measures by company. Based on review several document recruitment and promotions which conducted during 2020 and 2021 in mill and estate shows that company only gave relevant requirements which needed to be fulfilled by candidate who recruited or promoted e.g. medical fitness, relevant experiences in similar position, good attitude during working (for promotions), achieved company target by candidate (for promotions).</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 – Tungkal Ulu has a procedure to identify and prepare a risk assessment register (HIRAC). The procedure of HIRADC (Hazard identification and risk analysis and determining control) as a guidance and standard to conduct the hazard and risk assessment as well as the determining control for risk and hazard. Procedure presented in SOP "Identifikasi bahaya, Penilaian Resiko dan Penentuan Pengendalian" AA-SMK3-02-R0 dated 3 August 2017.</p> <p>Risk assessment method used is quantitative and qualitative method which is the multiplication of severity with the level of possibility. The company has set matrix multiplication result, which is subsequently determined from the matrix level / quality risk is divided into five (5) categories: extreme, high, moderate, low and tolerance/permitted.</p> <p>Risk Assessment presented in document of HIRADC - last review in February 2021 covering for all activities both in Tungkal Ulu POM and Estate, such as: boiler operation, sterilizer operation, generator set operation, loading ramp activity, cleaning of CPO storage tank, chemical mixing, fertilizer warehouse, herbicide, and pesticide sprayer, harvesting, road maintenance, HCV Monitoring, Boundary Monitoring, land application maintenance</p>	<p>Complied</p>

		<p>Mitigation plan to eliminate the risk and control the risk has been determined in the HIRADC document. Such as: Pressure gauge installation and emergency stop button in sterilizer to mitigate the explosion risk, grease application and wheel maintenance regularly on Lori to mitigate the risk of lori crash.</p> <p>PT Inti Indosawit Subur – Tungkal Ulu has prepared and documented the OHS Plan as in "Program Management K3 Tahun 2020", such as:</p> <ul style="list-style-type: none"> • Training on emergency response and preparedness • Training on implementation OHS management system (SMK3) • Implementation of risk assessment • Zero Accident and consistent on using of PPE • Review of accident report • Medical checkup for workers and provision of first aid kit, • Safety committee meeting, • OHS inspection <p><u>Smallholder:</u> During audit document HIRADC document for KUD Sawit Kita, Karya Kita, Karya Jaya, Panca Mukti, Sari Bumi and KUD Sawit Mulia were available and could be demonstrated.</p> <p>The document of "Hazard Identification and Risk Assessment and Control (HIRAC) – Analisis Risiko tahun 2020/2021", last review in April 2021. The document has covered for all activities in field, e.g: transport FFB, harvesting, manuring, spraying</p> <p>The implementation of risk analysis and risk control can be demonstrated during field audit such as: PPE provision for harvester (helmet, safety boot, glasses and hand gloves, chisel cover), OHS awareness for harvester and smallholder member.</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 – Tungkal Ulu and scheme smallholders has demonstrated the document of effectiveness of OHS program year 2021, such as:</p> <ul style="list-style-type: none"> • Refreshment training related to OHS, dated 16th March 2021, consisted of: understanding MSDS; handling empty pesticide containers; emergency response plan (for accident and spillage/contamination); prohibit use of agrochemical for pregnant and breastfeeding female worker; prohibit spraying in HCV and water body. • OHS safety meeting dated 5th July 2021 -> record of OHS meeting provided • Report of OHS inspection (monthly) -> last inspection was carried out on 21st July 2021 location in Tungkal Ulu POM were reported OK. • PPE Provision for all workers at mill are demonstrated as per "Bukti Serah Terima Alat Pelindung Diri Tungkal Ulu Estate". Sample seen; PPE (safety boot) provision for harvester as much as 21 unit, dated 11 February 2021. <p>Based on field visit during onsite audit for spraying workers in block and harvester the risk impact probability was irritated eyes, control by using appropriate PPE (eye wear/safety glasses, mask, and hand gloves) and regular training for sprayer workers.</p> <p>Discipline of PPE usage monitoring regularly conducted by Estate management to ensure all workers use the appropriate PPE during working. Monitoring record present in "Daftar Pemeriksaan Alat Pelindung Diri (APD)". Sample seen for PPE monitoring of fertilizer workers, spraying workers and harvester period January – July 2021.</p> <p>Based on interview with worker in pesticides application, method to minimizing risk and negative impact i.e: - Mixing of chemical conducted by trained person (Supervisor). There were aims to ensuring proper</p>	<p>Complied</p>
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		dosage, type of pesticide use. - Using of PPE while chemical mixing. Mixing of chemical located in mixing area, side by side with the chemical storage.	
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 – Tungkal Ulu has its own training institution assigned to arrange its training programmes. Asian Agri Learning assessing all the training need for each personnel – based on job description. The training plan prepared annually.</p> <p>Competence evaluation carried out by line managers, to evaluate competence level of each worker for relevant position. The matrix training is updated by HRD Medan and AAA Learning Institute annually. Based on minimum training requirement, AAA Learning institute, detailing training program in type of training, participants, PIC, number of participants, training schedule.</p> <p>Training program has been developed by company both mill and estate as per “Kalender Pelatihan Tahun 2020-2021 Learning & Development”. Training program developed to enhance the hard skill and soft skill for employee and staff, such as:</p> <ul style="list-style-type: none"> • Refresh of SOP Handling of pests and diseases (Pengendalian hama dan Penyakit), planned in February to March 2021 • Spraying Training; will be held on March to May 2021, • Herbicide Application Training, March, June, and August 2021 with target of participants as much as 10 participants • Heavy equipment (Operational and Maintenance) planned in August 2021 • Sustainability awareness include traceability, mass balance and HCV, will be held on February, March, May, July, and September 2021. • Basic fire training and fire equipment and service will be held on February and May 2021 	Complied

		<ul style="list-style-type: none"> • Job safety analysis training, will be held on February 2021 • Accidents Inspection and observation training will be held on January – March 202 • First aider certification training will be held on September 2021 	
3.7.2	Records of training are maintained, where appropriate on an individual basis.	<p>PT Inti Indosawit Subur has its own training institution assigned to arrange its training programs. Asian Agri Learning assessing all the training need for each personnel – based on job description. The training plan prepared annually.</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 realization based on the Training calendar period 2020-2021, including:</p> <ul style="list-style-type: none"> • Training of refresh SOP for pest and disease control, implemented on 15 March 2021 was attended by 42 participants. • Basic Fire training conducted on 16 September 2020 and attended by 32 participants. • Traceability training and book-keeping for supply chains, conducted on 16 February 2021 and attended by 6 participants from Tungkal Ulu POM. • Socialization of Pandemic Covid-19 for all communities/employees of PTS from the housing held on March 26, 2020. • Basic fire training, conducted on 3 November 2020 and attended by 16 participants • First aiders training conducted on 23 March 2021 was attended by 19 participants. 	Complied

		<p>Some documents can be shown at the time of the audit as proof is: the Calendar Training document period 2020-2021, the list of participants attending the trainees, and some photographs of the activities at the time of training.</p> <p><u>Smallholders</u> Record of training Program for each KUDs (KUD Sawit Kita, Karya Kita, Karya Jaya, Panca Mukti, Sari Bumi and KUD Sawit Mulia) has shown under "Program Pelatihan dan Realisasi Pelatihan 2021", such as:</p> <ul style="list-style-type: none"> • Training for harvester / smallholders • Training related to OHS for smallholder members • Training related to HV for smallholder members • Training on Emergency Response and Basic Fire dated 15 April 2021 was attended by 23 smallholder members • Training for harvesters dated 11 March 2021 was attended by 26 smallholder members 	
3.7.3	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.	Training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Latest training for RSPO SCCS concerning Traceability has been conducted on 24/04/2021. Training attend by Mill manager, KTU (head of administration), production clerk, internal audit, Weighbridge clerk, security, dispatch operator. Evidence of training are available (attendance list, training material).	Complied
<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>			
3.8.1	<p>Identity Preserved Module</p> <p>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</p>	PT. Inti Indosawit Subur – Tungkal Ulu POM uses Mass Balance supply chain model. The mill only claimed the FFB proportion from certified supply bases which comprise of company-own estate (Tungkal ulu	Complied

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	<p>RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.</p> <p>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>Estate) and 10 scheme Smallholder in form of cooperative/Koperasi Unit Desa (KUD).</p>	
3.8.2	<p>Mass Balance Module</p> <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>PT. Inti Indosawit Subur – Tungkal Ulu POM holds current RSPO P&C Certificate No. RSPO 594422, first certification start on 15 August 2012 and expired on 14 August 2022. In the current certificate, PT. Inti Indosawit Subur – Tungkal Ulu POM uses Mass Balance supply chain model. The mill only claimed the FFB proportion from certified supply bases which comprise of company-own estate (Tungkal ulu Estate) and 10 scheme Smallholder in form of cooperative/Koperasi Unit Desa (KUD). The proportion of non-certified FFB comes from third-party supplier, comprise of: HD, KSP, KUD Bina Usaha, Victory, YES, Asosiasi Tani Bersama, Gapoktan Maju Jaya, Merlung Topaz, Penyabungan Topaz, MH, Novie Zulhi, KT Dicky, PT Keluara Kemas Bertuah.</p>	Complied
3.8.3	<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 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 estimated tonnage of certified CPO and PK that could potentially produced by PT. Inti Indosawit Subur – Tungkal Ulu POM its recorded in RSPO Public Summary report, certificate and RSPO IT Paltform.</p> <p>The mill has met registration and reporting requirement as it registered in RSPO IT Platform (PalmTrace) with ID number RSPO_PO100000345. Below are the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year 2020:</p> <p><u>Forecast volume (May 2020 – April 2021)</u></p> <p>FFB : 145,135.34 MT</p>	Complied

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		<p>CPO : 32,481.29 MT (OER: 22.38%) PK : 8,127.58 (KER: 5.60%) <u>Actual production volume (May 2020 – April 2021)</u> CPO: 23,960.41 MT PK: 5,672.89 MT <u>Actual sold volume (May 2020 – April 2021)</u> CPO: 2,294.11 MT PK: 5,561.64 MT</p>	
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	<p>PT. Inti Indosawit Subur – Tungkal Ulu 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. PT Inti Indosawit Subur – Tungkal Ulu POM has meet all registration and reporting requirements. RSPO IT Platform/PalmTrace account RSPO_PO1000000345.</p>	Complied
3.8.5	<p>Documented procedures</p> <p>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> <ol style="list-style-type: none"> Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and 	<p>PT. Inti Indosawit Subur – Tungkal Ulu 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 Tungkal Ulu Estate and Smallholder, processing up to shipping of CPO and PK as well as daily production report. The procedure also regulates the internal audit by Sustainability Internal Audit Manager. Traceability records are to be kept for 10 years. 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 	Complied

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	<p>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>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.</p> <ul style="list-style-type: none"> • 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; - 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 - AA-MPM-OP-1400.17-R7 Traceability 	
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<p>3.8.6</p>	<p>Internal Audit</p> <ul style="list-style-type: none"> i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill; <ul style="list-style-type: none"> 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 organisation. 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>PT. Inti Indosawit Subur – Tungkal Ulu POM has a procedure to conduct internal audit RSPO, including RSPO SCCS as per Procedure of “AA-SOP-ES-6001-R5 dated 1 August 2020”. According to internal audit procedure, internal audit conducted once a year considering the critical area.</p> <p>The latest internal audit conducted on 8 – 15 February 2021 by Mr. Hendrik Simanjuntak (lead auditor), Wahyu, Ridho Ilahi, Ian Septian Arifin, Yohanes Simanjuntak.</p> <p>Internal audit report were evident, all issue raised during internal audit has been followed up by Corrective Action and Closed. Sample seen on internal audit issue: list of contractor has not been updated; follow up action taken by updating the list of contractor of Tungkal Ulu POM and kept the list of contractor by administration staff, evidence of follow up action was sighted during audit. Internal audit record and report were well maintained by administration staff (KTU) and sustainability officer.</p> <p>Management review conducted once a year as per “Standard Operating Procedures for Internal Audit and Management Review (AA-SOP-ES-6001-R4)”. Latest management review conducted on 12 April 2021. Minutes of management review and attendance list for management review are available.</p>	<p>Non-compliance</p>
<p>3.8.7</p>	<p>Purchasing and Goods In</p> <ul style="list-style-type: none"> i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBS received. ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage. iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents. 	<p>PT Inti Indosawit Subur – Tungkal Ulu 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 – Tungkal Ulu POM receive FFB from certified and non-certified source. Certified source consist of own estate (Tungkal Ulu Estate) and Scheme Smallholder (Tungkal Ulu Plasma). Non-certified</p>	<p>Complied</p>

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		<p>FFB sourced from third party supplier, e.g.: YES, KSP, HD, KUD Bina Usaha SP1, Victory, Teguh Prayoga, Jaya Mandiri, Merlung Topaz, MH, Gapoktan Maju Jaya, Penyabungan Topaz, Gapoktan Usaha Berkat, Asosiasi Tani Bersama and Novie Zulhi.</p> <p>Document "Surat Pengantar TBS" (FFB Delivery Note) and Kartu Timbangan (Weighbridge Ticket) described identity and location of FFB source and other item required e.g.</p> <p>Certified FFB:</p> <ul style="list-style-type: none"> - FFB delivery "Surat Pengantar TBS Tungkal Ulu Estate No.000940" from Afdeling 5, block E49g dated 30 June 2020 – total 181 bunches. Weighbridge ticket "Tiket Timbangan No.PTUA120204073" dated 30 June 2020, for 181 FFB bunches; nett weight 6,110 kg; from Tungkal Ulu Estate, Afdeling V, block E49g; vehicle BH8141MF; RSPO certificate No.RSPO594422. - FFB delivery note: "Surat Pengantar TBS KUD Karya Jaya, Kelompok Tani 16 "Harapan Jaya", Serial No. 00570 dated 01 June 2020. Vehicle Number BH 8276 BU, Driver: Dami, FFB amount: 330 bunches. Weighbridge ticket "Tiket Timbangan No.PTUA220201393" dated 01 June 2020, FFB amount: 330 bunches, nett weight 7,366 kg, FFB source from Kebun Plasma (KUD Karya Jaya), Farmer group Harapan Jaya, Vehicle BH 8276 BU, RSPO certificate No.RSPO594422. - FFB delivery note: "Surat Pengantar TBS KUD Sawit Kita, Kelompok Tani 17 "Cinta Damai", dated 2 June 2020. Vehicle Number BH 8209 EJ, Driver: Pawer, FFB amount 300 bunches. Weighbridge ticket "Tiket Timbangan No.PTUA220201408" dated 02 June 2020, or 300 FFB bunches, nett weight 11,290 kg, FFB source from KUD Sawit Kita, farmer group Cinta Damai, vehicle BH6583MK, RSPO certificate No.RSPO594422. - Weighbridge ticket No. PTUA121205995 dated 09/09/2021, FFB amount 1,103 bunches, Nett weight 6,720 kg, FFB source Afdeling IV 	
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		<p>Block D18a, D18b Tungkal Ulu Estate, Transporter: Internal, Vehicle number BH8274MG, Driver: Suprianta Sitepu, Batch number: 13-100-71392019062956, RSPO certificate number RSPO594422.</p> <ul style="list-style-type: none"> - Weighbridge ticket No. PTUA121025918 dated 06/09/2021, FFB amount 600 bunches, Nett weight 6,860 kg, FFB source Afdeling I Block A16c Tungkal Ulu Estate, Transporter: Internal, Vehicle number BH8580MF, Driver: H. Sianturi, Batch number: 13-100-71392019062229, RSPO certificate number RSPO594422. <p>Non-certified FFB:</p> <ul style="list-style-type: none"> - FFB delivery note: "Surat Pengantar TBS HD", dated 10 May 2019. Vehicle code BH8078MF; driver hairul; carrying 500 bunches. Weighbridge ticket "Tiket Timbangan No.PTUA519204083" dated 10 May 2019, for 500 FFB bunches; nett weight 9,667 kg; FFB source from non-certified third party FFB supplier HD; vehicle BH8018MF. - FFB delivery note: "Surat Pengantar TBS Makmur Mandiri", dated 10 May 2019. Vehicle code BH8169EI; driver Gono; carrying 300 bunches. Weighbridge ticket "Tiket Timbangan No.PTUA519204099" dated 10 May 2019, for 300 bunches; nett weight 7,078 kg; FFB source from non-certified third party FFB supplier Makmur Mandiri; vehicle BH8169EI. - Weighbridge ticket No. PTUA521212781 dated 30/08/2021, FFB amount 596 bunches, Nett weight 8,347 kg, FFB source KUD Bina Usaha (non certified), Transporter: General, Vehicle number BH8513OU, Driver: Godi, Delivery note number: 1113. - Weighbridge ticket No. PTUA521212318 dated 09/09/2021, FFB amount 754 bunches, Nett weight 10,562 kg, FFB source Novie Zulhi (noncertified), Transporter: General, Vehicle number BH8028EM, Driver: Capung, Delivery note number: 03269. 	
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<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> <ul style="list-style-type: none"> a) The name and address of the buyer; b) The name and address of the seller; c) The loading or shipment / delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation; i) A unique identification number. 	<p>PT Inti Indosawit Subur – Tungkal Ulu POM shows SOP Traceability (AA-MPM-OP-1400.7.R7), section 6.2 indicating the Marketing manager creates Sales Contract and Delivery Order (DO) with information: name and address of production unit; name and address of buyer; contract number; type of product; transportation (air, land, sea); type of product CPO/PK certified or non-certified; quantity of product sold, CPO/PK certified or non-certified in MT; date of shipping; product quality specification CPO/PK (FFA, water content, dirt content); and Supply chain model (Mass Balance).</p> <p>At Mill site, weighbridge operator will printed out CPKO weighbridge card, based on DO from marketing indicating: Type of commodity, CPKO certified or non-certified; country of origin: Indonesia; Supply Chain model: (Mass Balance); Certificate number of the KCP; date of delivery, Product quality specification (moisture, FFA, dirt); Contract number/DO number; Quantity, Transport detail (driver name, vehicle number); and Buyer address.</p> <p>Sales Contract and Delivery Order indicates name and address of seller, name and address of buyer, loading date, supply chain certificate number and unique identification number.</p> <p>Sample seen:</p> <ul style="list-style-type: none"> - Sales contract "Kontrak Penjualan No.01031/CB10/02/20 antara PT. Inti Indosawit Subur dan PT. Sari Dumai Sejati" dated 23 January 2020 for sales of 250,000 kg commodity Minyak Kelapa Sawit RSPO; Supply Chain Model Mass Balance; Certificate RSPO594422. Remarks: Pihak penjual bertanggungjawab atas penyerahan sampai kawasan berikat PT. Sari Dumai Sejati Lubuk Gaung dengan Ongkos Angkut ditanggung Pihak Pembeli. Information contain in the sales contract: 	<p>Complied</p>
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		<ul style="list-style-type: none"> ✓ Name and address of buyer: PT. Sari Dumai Sejati, Jl. M.H Thamrin No.31, Kebon melati, Tanah Abang, Jakarta Pusat, DKI Jakarta 10230. ✓ Name and address of seller: PT. Inti Indosawit Subur, Jl. M.H Thamrin No.31, Kebon melati, Tanah Abang, Jakarta Pusat, DKI Jakarta 10230. ✓ The loading date: 23 January – 20 March 2020. ✓ The date on which the documents were issued: 1 March 2019. ✓ A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations): Product Minyak Kelapa Sawit RSPO (CSPO). Supply Chain Model Mass Balance (MB). ✓ The quantity of the products delivered: 250.000 kg. ✓ Any related transport documentation: Transporter PT. Sumber Kencana Inhu Vehicle No.BM8958BU. ✓ Supply chain certificate number of the seller: RSPO Certificate No.RSPO594422. ✓ A unique identification number: DO No.01031/DB10/02/20 and DO No.112023/DB10/02/19. <p>- Delivery Order PT. Inti Indosawit Subur No.01031/DB10/02/20 dated 23 January 2020, instruction to PT. Inti Indosawit Subur – Manager Tangki Timbun Rengat to deliver 250,000 kg commodity Minyak Kelapa Sawit RSPO; Supply Chain Model Mass Balance; No.Ref. RSPO 594422.</p> <p>The Delivery Order No.01031/DB10/02/20 was comprise of 12 Weighbridge ticket. Sample Weighbridge ticket from Tungkal Ulu POM to customer, delivery period 23 January – 20 March 2020:</p> <ul style="list-style-type: none"> - Weighbridge ticket No.PTUC120100151 dated 23 January 2020. Destination PT. Sari Dumai Sejati-Teluk Bagus, Rengat. Commodity 	
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		<p>CPO Certified RSPO. Supply Chain Model Mass Balance. RSPO Certificate No.RSPO594422. DO No.01031/DB10/02/20. Transporter PT. Sumber Kencana Inhu, No. SP 10/SKI/01/2020; Vehicle No.BM8958BU. Volume dispatched 23.140 MT. Bath No.RSPO CERT 594422, Seal Number 4855915 - 4855921.</p> <ul style="list-style-type: none"> ✓ Weighbridge ticket No.PTUC120100441 dated 20 March 2020. Destination PT. Sari Dumai Sejati-Teluk Bagus, Rengat. Commodity CPO Certified RSPO. Supply Chain Model Mass Balance. RSPO Certificate No.RSPO594422. DO No.01031/DB10/02/20. Transporter PT. Sumber Kencana Inhu, No. SP 01/SKI/03/2020; Vehicle No.BM8958BU. Volume dispatched 19.970 MT. Bath No.RSPO CERT 594422, Seal Number 1042492 - 1042498. <p>This transaction was recorded in PalmTrace as TR-84868ec9-a3c2, dated 29 April 2020 for CSPO Mass Balance, volume 270.25 MT.</p> <ul style="list-style-type: none"> - Sales contract "Kontrak Penjualan No.10033/CB10/02/20 PT. Inti Indosawit Subur dan PT. Sari Dumai Sejati" dated 21 October 2020 for sales of 300,000 kg commodity Minyak Kelapa Sawit RSPO; Supply Chain Model Mass Balance; Certificate RSPO594422. Remarks: Asal CPO dari PMKS Tungkal Ulu Jambi, Pihak penjual bertanggungjawab atas penyerahan sampai kawasan berikat PT. Sari Dumai Sejati Lubuk Gaung dengan Ongkos Angkut ditanggung Pihak Pembeli. Information contain in the sales contract: <ul style="list-style-type: none"> ✓ Name and address of buyer: PT. Sari Dumai Sejati, Jl. M.H Thamrin No.31, Kebon melati, Tanah Abang, Jakarta Pusat, DKI Jakarta 10230. ✓ Name and address of seller: PT. Inti Indosawit Subur, Jl. M.H Thamrin No.31, Kebon melati, Tanah Abang, Jakarta Pusat, DKI Jakarta 10230. ✓ The loading date: October 2020. 	
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		<ul style="list-style-type: none"> ✓ The date on which the documents were issued: 21 october 2020. ✓ A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations): Product Minyak Kelapa Sawit RSPO (CSPO). Supply Chain Model Mass Balance (MB). ✓ The quantity of the products delivered: 300.000 kg. ✓ Any related transport documentation: Transporter CV Jaya Pertama Vehicle No.BK9174EM & BK9182EM. ✓ Supply chain certificate number of the seller: RSPO Certificate No.RSPO594422. ✓ A unique identification number: DO No. 10033/DB10/02/20. <p>- Delivery Order PT. Inti Indosawit Subur No. 10033/DB10/02/20 dated 21 October 2020, instruction to PT. Inti Indosawit Subur – Manager Tangki Timbun Rengat to deliver 300,000 kg commodity Minyak Kelapa Sawit RSPO; Supply Chain Model Mass Balance; No.Ref. RSPO 594422.</p> <p>The Delivery Order 10033/DB10/02/20 was comprise of 12 Weighbridge ticket. Sample Weighbridge ticket from Tungkal Ulu POM to customer, delivery period October 2020, sample seen:</p> <ul style="list-style-type: none"> - Weighbridge ticket No.PTUC120101466 dated 21 October 2020. Destination PT. Sari Dumai Sejati-Talang Duku. Commodity CPO Certified RSPO. Supply Chain Model Mass Balance. RSPO Certificate No.RSPO594422. DO 10033/DB10/02/20. Transporter CV Jaya Pertama, No. SP 1671; Vehicle No. BK9174EM. Nett weight 28,160 kg. Bath No.RSPO CERT 594422, Seal Number 5139829-5139836. - Weighbridge ticket No.PTUC120101467 dated 22 October 2020. Destination PT. Sari Dumai Sejati-Talang Duku. Commodity CPO Certified RSPO. Supply Chain Model Mass Balance. RSPO Certificate 	
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		<p>No.RSPO594422. DO 10033/DB10/02/20. Transporter CV Jaya Pertama, No. SP BV1737/JP/20; Vehicle No. BK9182EM. Nett weight 20,740 kg. Bath No.RSPO CERT 594422, Seal Number 5139843-5139846.</p> <p>This transaction was recorded in PalmTrace as TR-c036fcc0-75dc, dated 30 December 2020 for CSPO Mass Balance, volume 289.29 MT.</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 – Tungkal Ulu POM operate subcontractor for CPO and PK transporter. The appointed outsourced company is PT. Perintis Lintas Talang Duku and PT Trans Jaya.</p> <p>PT IIS Tungkal Ulu 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 by:</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. ✓ 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 segel. <p>Recapitulation of CPO and PK incoming from PT Sari Dumai Sejati, contain information of CPO/PK incoming date to PT SDS, Vehicle Number, origin of CPO and PK, Volume of CPO and PK deliver by Tungkal Ulu POM and receive by PT SDS, variant of volume, percentage of</p>	<p>Complied</p>

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		variant, quality of CPO and PK (FFA and moisture) deliver by Tungkal Ulu POM and receive by PT SDS (Bulking station). In addition, PT Sari Dumai Sejati has implementing the certification of RSPO SCCS and has been certified by Control Union with RSPO Certificate Number CU-RSPO SCC-821960 valid until 29/08/2022. It is indicated that PT SDS has internal control to ensure and monitor the Comply of CPO/PK delivery by transporter.																
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 - Tungkal Ulu POM has recorded name and contact detail of all contractors, as follows:</p> <table border="1"> <tr> <td>Nae of Transporter</td> <td>CV. Perintis Lintas Talang Duku</td> <td>PT Trans Jaya</td> </tr> <tr> <td>Initial Name</td> <td>Subagio</td> <td>Vincent Purba</td> </tr> <tr> <td>Address</td> <td>Jl. Serunai Malam III No. 88A RT.003, Suka Karya, Jambi</td> <td>Medan, Sumatera Utara</td> </tr> <tr> <td>Contact Person</td> <td>Subagio</td> <td>Rudy</td> </tr> <tr> <td>Telephone</td> <td>0741-208***</td> <td>0812 6041****</td> </tr> </table>	Nae of Transporter	CV. Perintis Lintas Talang Duku	PT Trans Jaya	Initial Name	Subagio	Vincent Purba	Address	Jl. Serunai Malam III No. 88A RT.003, Suka Karya, Jambi	Medan, Sumatera Utara	Contact Person	Subagio	Rudy	Telephone	0741-208***	0812 6041****	Complied
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Contact Person	Subagio	Rudy																
Telephone	0741-208***	0812 6041****																
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</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 - Weigbridge ticket for FFB receiving, CPO and PK delivery - Delivery Order 	Complied															

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	<p>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>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>	<ul style="list-style-type: none"> - Sales contract - Shipping Announcement - Mass balance report - Internal audit RSPO SCCS and Management review <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 Tungkal Ulu POM" period 2019: January – March, April – June, July – September, October – December and period 2020: January – March, April – June, July – September, October – December; Period 2021: January – March, April – June, July – ytd September.</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, Tungkal Ulu POM only deliver Mass Balance sales from a positive stock.</p>	
3.8.13	<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 FY2020/2021 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 – Tungkal Ulu 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 2021 as 20.32% and KER as 5.25%.</p>	Complied

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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 – Tungkal Ulu POM is able to demonstrate the work instruction for analysis of oil content.</p> <p>Based on Laporan Harian Produksi dated 31 August 2021, the sounding result and production report shows that actual conversion ratios from FFB into CPO are:</p> <ul style="list-style-type: none"> a. For FFB from Tungkal Ulu Estate: 22.67% b. For FFB from Tungkal Ulu Plasma: 20.72% c. For FFB from third-party: 19.03% <p>And actual conversion ratios from FFB into PK are:</p> <ul style="list-style-type: none"> a. For FFB from Tungkal Ulu Estate: 5.36% b. For FFB from Tungkal Ulu Plasma: 5.35% c. For FFB from third-party: 5.36% <p>Budget vs Actual conversion ratios year 2020 from FFB into CPO are:</p> <ul style="list-style-type: none"> a. For FFB from Tungkal Ulu Estate: budget 22.70%, actual 22.83% b. For FFB from Tungkal Ulu Plasma: budget 20.95%, actual 21.09% c. For FFB from third-party: budget 19.12%, actual 19.05% <p>And actual conversion ratios year 2020 from FFB into PK are:</p> <ul style="list-style-type: none"> a. For FFB from Tungkal Ulu Estate: budget 5.35%, actual 5.29% b. For FFB from Tungkal Ulu Plasma: budget 5.35%, actual 5.30% c. For FFB from third-party: budget 5.35%, actual 5.30% 	Complied
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</p>	<p>PT. Inti Indosawit Subur – Tungkal Ulu POM uses Mass Balance supply chain model. The mill only claimed the FFB proportion from certified supply bases which comprise of company-own estate (Tungkal ulu Estate) and 10 scheme Smallholder in form of cooperative/Koperasi Unit Desa (KUD).</p>	Complied

	<p>palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>																																																																				
<p>3.8.16</p>	<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 – Tungkal Ulu POM has made shipping announcement inside PalmTrace transaction, sample seen for period July 2020 – June 2021:</p> <table border="1" data-bbox="1131 611 1957 1369"> <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-4e55b2c6-1f36</td> <td>KCP TU</td> <td>CSPK</td> <td>Mass Balance</td> <td>334.96</td> <td>Confirmed</td> </tr> <tr> <td>TR-cee77d84-bf21</td> <td>KCP TU</td> <td>CSPK</td> <td>Mass Balance</td> <td>271.12</td> <td>Confirmed</td> </tr> <tr> <td>TR-5f62f76e-ea12</td> <td>KCP TU</td> <td>CSPK</td> <td>Mass Balance</td> <td>203.01</td> <td>Confirmed</td> </tr> <tr> <td>TR-9a250319-5740</td> <td>KCP TU</td> <td>CSPK</td> <td>Mass Balance</td> <td>341.41</td> <td>Confirmed</td> </tr> <tr> <td>TR-c341abe2-e352</td> <td>PT SDS</td> <td>CSPO</td> <td>Mass Balance</td> <td>7.57</td> <td>Confirmed</td> </tr> <tr> <td>TR-7ef80c1c-59b9</td> <td>KCP TU</td> <td>CSPK</td> <td>Mass Balance</td> <td>293.29</td> <td>Confirmed</td> </tr> <tr> <td>TR-bc87de6c-4b26</td> <td>KCP TU</td> <td>CSPK</td> <td>Mass Balance</td> <td>277.63</td> <td>Confirmed</td> </tr> <tr> <td>TR-b20795ef-1429</td> <td>PT SDS</td> <td>CSPO</td> <td>Mass Balance</td> <td>28.69</td> <td>Confirmed</td> </tr> <tr> <td>TR-66c91101-c901</td> <td>KCP TU</td> <td>CSPK</td> <td>Mass Balance</td> <td>436.66</td> <td>Confirmed</td> </tr> <tr> <td>TR-fe92df4e-8ddd</td> <td>KCP TU</td> <td>CSPK</td> <td>Mass Balance</td> <td>434.12</td> <td>Confirmed</td> </tr> </tbody> </table>	Transaction ID	Buyer	Product	Supply Chain Model	Volume *	Status	TR-4e55b2c6-1f36	KCP TU	CSPK	Mass Balance	334.96	Confirmed	TR-cee77d84-bf21	KCP TU	CSPK	Mass Balance	271.12	Confirmed	TR-5f62f76e-ea12	KCP TU	CSPK	Mass Balance	203.01	Confirmed	TR-9a250319-5740	KCP TU	CSPK	Mass Balance	341.41	Confirmed	TR-c341abe2-e352	PT SDS	CSPO	Mass Balance	7.57	Confirmed	TR-7ef80c1c-59b9	KCP TU	CSPK	Mass Balance	293.29	Confirmed	TR-bc87de6c-4b26	KCP TU	CSPK	Mass Balance	277.63	Confirmed	TR-b20795ef-1429	PT SDS	CSPO	Mass Balance	28.69	Confirmed	TR-66c91101-c901	KCP TU	CSPK	Mass Balance	436.66	Confirmed	TR-fe92df4e-8ddd	KCP TU	CSPK	Mass Balance	434.12	Confirmed	<p>Complied</p>
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		TR-8d5657bd-46ba	PT SDS	CSPO	Mass Balance	298.79	Confirmed
		TR-c036fcc0-75dc	PT SDS	CSPO	Mass Balance	289.29	Confirmed
		TR-3dfba585-ca01	KCP TU	CSPK	Mass Balance	461.68	Confirmed
		TR-6f8c9603-ce74	KCP TU	CSPK	Mass Balance	301.45	Confirmed
		TR-dc8cfc5b-4a0a	KCP TU	CSPK	Mass Balance	297.05	Confirmed
		TR-d0b92dc5-5c41	KCP TU	CSPK	Mass Balance	316.43	Confirmed
		TR-17fa5745-f911	KCP TU	CSPK	Mass Balance	404.07	Confirmed
		TR-ce12ed5f-1f07	PT SDS	CSPO	Mass Balance	186.24	Confirmed
		TR-2c32c8ea-0f60	PT SDS	CSPO	Mass Balance	178.68	Confirmed
		TR-fbce04c5-2bd0	KCP TU	CSPK	Mass Balance	377.6	Confirmed
		TR-3d243148-ca89	PT SDS	CSPO	Mass Balance	150	Confirmed
<p><i>Keterangan: KCP TU (KCP Tungkal Ulu), SDS (Sari Dumai Sejati)</i></p> <p>PT. Inti Indosawit Subur – Tungkal Ulu POM made remove RSPO certified CSPO from their PalmTrace account:</p> <ul style="list-style-type: none"> - Transaction ID: ST-TR-4632c642-73e0 for removed 20,807.7 MT CSPO from certified stock, dated 03/07/2020; Stock removed for CSPO sold as ISCC certified. 							

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		Transaction ID: ST-TR-ed9bc4c8-8a23 for removed 15,011.06 MT CSPO from certified stock, dated 06/09/2021; Stock removed for CSPO sold as ISCC certified.	
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 – Tungkal Ulu 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	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.	PT. Inti Indosawit Subur (with the brand Asian Agri), the parent company of Tungkal Ulu 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> <p>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."</p> <p>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.</p> <p>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."</p>	Complied

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		<p>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 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>	Not Applicable
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 did not lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.</p>	Not Applicable
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.	<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>	Not Applicable
Business to business communications			

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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.	No, PT. Inti Indosawit Subur (with the brand Asian Agri), did not display its RSPO membership status. 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.	Not Applicable
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	No, PT. Inti Indosawit Subur (with the brand Asian Agri), did not display its RSPO membership status. 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.	Not Applicable
5.3	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: 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. b) If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.	No, PT. Inti Indosawit Subur (with the brand Asian Agri), did not display its RSPO membership status. 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.	Not Applicable
5.4	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	PT. Inti Indosawit Subur – Tungkal Ulu POM is not producing or selling end-product to consumer. No labelling on product whatsoever. Not applicable.	Not Applicable

	<p>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>		
Business to consumer communication			
6.1	<p>Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as 'product-specific' claims. Product-specific claims are voluntary.</p>	<p>PT. Inti Indosawit Subur – Tungkal Ulu POM is not using product-specific claims in its CSPKO product. PT. Inti Indosawit Subur – Tungkal Ulu POM is producing and selling CSPO and CSPK; and not making a business to consumer communication.</p> <p>Not applicable.</p>	Not Applicable
6.2	<p>Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below.</p>	<p>PT. Inti Indosawit Subur – Tungkal Ulu POM is not using RSPO trademark and/or RSPO label. PT. Inti Indosawit Subur – Tungkal Ulu POM is producing and selling CSPO and CSPK; and not making a business to consumer communication.</p> <p>Not applicable.</p>	Not Applicable
6.3	<p>When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.</p>	<p>PT. Inti Indosawit Subur – Tungkal Ulu POM is not using RSPO-certified on-pack claim. PT. Inti Indosawit Subur – Tungkal Ulu POM is producing and selling CSPO and CSPK; and not making a business to consumer communication.</p> <p>Not applicable.</p>	Not Applicable
6.4	<p>Business to consumer communication shall not include information about the claimant's RSPO membership status.</p>	<p>PT. Inti Indosawit Subur – Tungkal Ulu POM is not making any claim related to their RSPO membership status. PT. Inti Indosawit Subur – Tungkal Ulu POM is producing and selling CSPO and CSPK; and not making a business to consumer communication.</p> <p>Not applicable.</p>	Not Applicable

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6.5	Members shall not communicate to consumers' information about their suppliers' RSPO membership status.	PT. Inti Indosawit Subur – Tungkal Ulu POM is not making any information about their supplier's RSPO membership status. PT. Inti Indosawit Subur – Tungkal Ulu POM is producing and selling CSPO and CSPK; and not making a business to consumer communication. Not applicable.	Not Applicable
6.6	Use of the RSPO trademark is restricted to claims about RSPO-certified sustainable palm oil products and it is not authorised for use in relation to any other ingredient.	PT. Inti Indosawit Subur – Tungkal Ulu POM is not using RSPO trademark and/or RSPO label. Not applicable.	Not Applicable
6.7	Use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorised product-specific claim.	PT. Inti Indosawit Subur – Tungkal Ulu POM is not using RSPO trademark and/or RSPO label. Not applicable.	Not Applicable
6.8	RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules applying to RSPO supply chain certified members. The guidance document for audits is available on www.rspo.org .	PT. Inti Indosawit Subur – Tungkal Ulu POM is retailers or food service company. Not applicable.	Non-compliance

MODULE A – IDENTITY PRESERVED & SEGREGATED SPECIFIC RULES (delete if not applicable)

MODULE B – MASS BALANCE SPECIFIC RULES

Minimum Mass Balance content			
	95% or above of the oil palm content must be RSPO MB-certified.	PT Inti Indosawit Subur – Tungkal Ulu 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.	There is percentage of non-certified oil palm within the product CSPO/CSPK. PT Inti Indosawit Subur – Tungkal Ulu POM was not produce end consumer goods. The production are CPO and PK.	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 	<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 – Tungkal Ulu POM followed the requirements of the RSPO SCCS. PT Inti Indosawit Subur – Tungkal Ulu POM stating the supply chain model and certificate number under which the claim is being made.</p>	Complied

	provided in the RSPO Trademark License Terms and Conditions and 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 – Tungkal Ulu POM was not messaging in storytelling in product-related communications. It was verified during audit through sales contract, DO and dispatch slip (weighbridge card).	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>	<p>Tungkal Ulu Estate and Mill:</p> <p>The company has had a corporate policy set on 1 December 2019 in Medan which has been ratified by the Managing Director (Kevin Tio). The policy relating to human rights, is explained in point 13, stating that: "The company respects human rights by treating all employees fairly, both in terms of acceptance, valuation, conditions and working</p>	Non-compliance

		<p>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".</p> <p>The company's policy is also published to use posters at any strategic places in the plantations (Tungkal Ulu Estate and Tungkal Ulu Mill. Corporate policy has been socialized/dissemination to all levels of PT Inti Indosawit Subur employees on 21-22 January 2020 (list of participants can be shown) and on stakeholders (including local contractors) on 23-43 January 2020 which was attended by 25 stakeholders.</p> <p>Separately, the company has also had a policy related a Human Rights Defender, which is stated in the Internal Memorandum No. 049/HO/MEMO/INT/03/20 from Head Operational on 20 March 2020: "Protection against the reporters/defenders of human rights defender from acts of revenge, intimidation and harassment.</p> <p>The socialization of this policy has been done to all employees in Estate and Mill. On 7 March 2020 Tungkal Ulu Estate and Mill has socialized this policy to all workers at the workplace (list of attendance was available). Socialized to stakeholders (external related parties) includes supply chain and local communities on 7 March 2020 as well.</p> <p>Smallholder: Based on the document review, scheme smallholder has had Human Rights Policy. However, there is no specific policy regarding to retaliation against Human Rights Defender (HRD). It raised as noncompliance.</p> <p>Onsite audit: Tungkal Ulu Estate and Mill: There was no change information since the previous assessment. Certificate holder has had policy to respect human rights, including</p>	
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		<p>prohibiting retaliation against Human Rights Defenders (HRD). The dissemination of this policy were in place.</p> <p>Smallholders:</p> <p>Tungkal Ulu Plasma already has a human rights policy, the policy is authorized to each cooperative, for example: KUD Panca Mukti policy in May 2021, where the human rights policy is outlined in point 9; "<i>KUD Menghormati hak azasi manusia dengan melakukan seluruh karyawan KUD maupun petani secara adil, abik dalam penrimaan, penilaian, kondisi dan lingkungan kerja serta keterwakilan tanpa mamandang suku, kasta, asal negara, agama/kepercayaan, cacat gender, orientasi seksual, keanggotaan serikat pekerja, afiliasi politik dan/atau umur</i>". This policy has been socialized to all member and staff of each cooperative for example at KUD Karya Jaya has conducted on 8 April 2021 attended by 21 participants, at KUD Karya Kita has conducted on 7 April 2021 attended by 22 participants, and at KUD Panca Mukti has conducted on 6 May 2021 attended by 29 participants.</p> <p>Based on NCR Close Out verification, certificate holder has shown the latest human right policy of smallholder. Clause No. 13 says, "Respect human rights defenders without making retaliation or intimidation". The socialization of this policy has been held respectively in each KUD's as follows:</p> <ol style="list-style-type: none"> 1. KUD Karya Jaya on 11 July 2020, attended by 21 participants. 2. KUD Sari Bumi on 11 July 2020, attended by 18 participants. 3. KUD Sawit Kita on 11 July 2020, attended by 25 participants. 4. KUD Karya Jaya on 11 July 2020, attended by 21 participants. <p>Based on this document verification, this NC has been closed.</p>	
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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.	There is no evidence that company is using mercenaries and or paramilitaries in operational activities of the company. Based on interview with stakeholders (i.e. Government agency, Head of Village, Workers & Labor Union) and also online search was revealed that company does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operational activities.	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>Onsite Audit:</p> <p>Based on public consultations with community leaders in Pulau Pauh Village and related agencies, it is stated that so far there have been no issues regarding complaints submitted by the surrounding community.</p> <p>Based on public consultations with NGOs (WALHI-Jambi and PPJ) stated that between the people of Tanjung Paku Village and PT IIS there has been a conflict since the beginning of the plantation development where the last complaint made by the Tanjung Paku community occurred on June 23, 2021 by occupying land in Block E93D and E93C. At that time a meeting was held as documented in the Minutes of the Meeting dated June 23, 2021. The meeting was attended by representatives of Tanjung Paku Village (Village Team and Tanjung Paku Village Head), Tanjung Paku Village Resident Assistance (WALHI and PPJ), company representatives, representatives Merlung sub-district government consisting of (Camat, Kapolsek, Babinsa) and the Head of Intelligence at the Tanjung Jabung Barat Police.</p> <p>Then, after the demonstration on June 23, 2021, a follow-up meeting was held in the Kesbangpol Meeting Room of Tanjung Jabung Barat Regency respectively as follows:</p>	Complied

		<p>Meeting on 8 July 2021 with an agreement:</p> <ol style="list-style-type: none"> a. The local government will write to PT IIS temporarily so that it does not carry out activities on the 107.07 ha land to avoid things that are not desirable. b. The public is asked to complete document materials related to these problems. c. The Integrated Team for Handling Social Conflicts in Tanjung Jabung Barat Regency will examine what was conveyed by the community and PT IIS and coordinate with related parties. d. The Integrated Team for Handling Social Conflicts will invite / bring back related parties, and PT IIS to bring competent parties to make decisions. <p>Meeting on August 2, 2021:</p> <ol style="list-style-type: none"> a. Requesting information from BPN stating that PT IIS land is included in the Tanjung Paku Village area b. Get an overview from a neighboring village about the Tanjung Paku Village area c. Field observations/reviews will be carried out jointly in the third week of August. d. At a follow-up meeting, which is planned to be chaired by the Regent, PT IIS and the community of Tanjung Paku Village are asked to bring other supporting documents. <p>Based on document studies and field visits, it is shown that:</p> <ol style="list-style-type: none"> a. Based on the field visit, it was shown that on June 23, 2021, the community occupied PT IIS's oil palm plantation area around Blocks 	
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		<p>E93D and E93C where both blocks are in HGU Certificate No. 036 and No. 044.</p> <ul style="list-style-type: none"> b. Residents of Tanjung Paku Village marked the occupied Block with red paint on electricity poles at the edge of the transport road and on palm trees that read "Tj Paku". c. Based on field verification, it shows that Blocks E93D and E93C are among HGU No. 06, 07 and 28 where during the field visit the condition of the stakes looked well maintained, the number of the stakes was clearly visible. d. The condition of the E93D and E93C blocks did not indicate any harvesting or plant maintenance activities. e. Blocks E93D and E93C are positioned between the Pulau Pauh/Merlung WD Plasma and Rantau Badak WD Plasma. <p>Based on management's statement, it is stated that the Company has decided to follow the process of resolving land conflicts with Tanjung Paku Village which is mediated by the Regional Government of Tanjung Jabung Barat Regency (National and Political Unity Agency) as stipulated in the SOP for Land Conflict Resolution.</p> <p>Based on the verification of documents and information from the relevant agencies, it also shows that PT IIS has several procedures for resolving disputes, namely:</p> <ul style="list-style-type: none"> a. Standard Operating Procedure (SOP) No. AA-GL-5003.1-RI concerning Land Conflict Management which was approved by management on December 5, 2009 and has undergone revision I on August 22, 2011. In 2015 the company revised II Mechanism for handling conflicts as outlined in the Standard Operating Procedure 	
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		<p>(SOP). No. AA-GL-5003.1-R2 regarding Land Conflict Management which was approved by management on 08 May 2015.</p> <p>b. SOP Penanganan Keluhan Masyarakat No: AA-GL-510.1-R0, dated 1 January 2013.</p> <p><i>4.1 Reporting Public Complaints</i></p> <p><i>4.1.1 General Scope: "Procedures ... for handling complaints from Concerned Parties including organizations, people, groups or institutions ...". In order for the Company to respond appropriately to the Parties' complaints in order to be identified, anonymous questions or complaints (without identity / cannot be traced by their identity) cannot be accepted. "</i></p> <p><i>4.2 Procedure for Handling / Resolving Community Complaints</i></p> <p><i>4.2.5 "This form identifies the person or organization that submitted the complaint, along with the basis of the complaint and the background of the acknowledgment (detailed description of the incident, name of the Party involved, the specific time when the event was the reason for the complaint and the basis of the complaint).</i></p> <p><i>4.2.12 "... The company will endeavour to resolve complaints within 15 working days".</i></p> <p>c. The mechanism used for handling employee complaints is as outlined in the SOP document No. AA-HR-308.5-R0, Rev 0 (SOP for Submission and Resolution of Employee Complaints) signed by Management on December 11, 2009. In the SOP, the procedures for submitting and handling employee complaints have been described, starting from how to submit complaints, the time for giving responses, parties who is responsible for responding to every employee complaint and documenting every employee complaint.</p>	
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		<p>Smallholders</p> <p>Each plasma cooperative that is sampled already has a Plasma Estate Consultation, Communication and Complaints Mechanism in the form of a Flowchart signed by the Cooperative Chair and has been shown by the officer who is responsible for communicating, including the section that does documentation of every complaint that comes from stakeholders.</p>	
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.	<p>Unit of Certification established mechanism to handle complaint and grievances, within the procedures:</p> <ul style="list-style-type: none"> • "SOP Penanganan Keluhan dari Eksternal No. AA-GL-5005-R0 01" explains mechanism to resolve external complaint; • "SOP Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan No. AA-HR-308 0.5R0" related to internal grievance mechanism for employee. • SOP Penanganan Keluhan Masyarakat No: AA-GL-510.1-R0, dated 1 January 2013. <p>4.1 Reporting Public Complaints</p> <p>4.1.1 General Scope: "Procedures ... for handling complaints from Concerned Parties including organizations, people, groups or institutions ...". In order for the Company to respond appropriately to the Parties' complaints in order to be identified, anonymous questions or complaints (without identity / cannot be traced by their identity) cannot be accepted. "</p> <p>4.2 Procedure for Handling / Resolving Community Complaints</p> <p>4.2.5 "This form identifies the person or organization that submitted the complaint, along with the basis of the complaint and the background of the acknowledgment (detailed description of the incident, name of the Party involved, the specific time when the</p>	Complied

		<p>event was the reason for the complaint and the basis of the complaint).</p> <p>4.2.12 "... The company will endeavour to resolve complaints within 15 working days".</p> <p>Onsite Audit:</p> <p>The company has shown evidence of socializing complaints handling procedures to the surrounding community. For example, the socialization on 7 December 2020 which was attended by 34 participants who were representatives of the surrounding community, including a special re-socialization for Tanjung Paku villagers which was carried out in conjunction with the meeting on 23 June 2021.</p> <p>Based on interviews with community leaders in Pulau Pauh Village, it shows that they have understood the mechanism for submitting complaints to the company.</p>	
4.2.3	<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>As described in indicator 4.2.1 which explains that based on public consultations with community leaders in Pulau Pauh Village and related agencies, it is stated that so far there have been no issues regarding complaints submitted by the surrounding community.</p> <p>Based on public consultations with NGOs (WALHI-Jambi and PPJ) stated that between the people of Tanjung Paku Village and PT IIS there has been a conflict since the beginning of the plantation development where the last complaint made by the Tanjung Paku community occurred on June 23, 2021 by occupying land in Block E93D and E93C. At that time a meeting was held as documented in the Minutes of the Meeting dated June 23, 2021. The meeting was attended by representatives of Tanjung</p>	Complied

		<p>Paku Village (Village Team and Tanjung Paku Village Head), Tanjung Paku Village Resident Assistance (WALHI and PPJ), company representatives, representatives Merlung sub-district government consisting of (Camat, Kapolsek, Babinsa) and the Head of Intelligence at the Tanjung Jabung Barat Police.</p> <p>Then, after the demonstration on June 23, 2021, a follow-up meeting was held in the Kesbangpol Meeting Room of Tanjung Jabung Barat Regency respectively as follows:</p> <p>Meeting on 8 July 2021 with an agreement:</p> <ol style="list-style-type: none"> a. The local government will write to PT IIS temporarily so that it does not carry out activities on the 107.07 ha land to avoid things that are not desirable. b. The public is asked to complete document materials related to these problems. c. The Integrated Team for Handling Social Conflicts in Tanjung Jabung Barat Regency will examine what was conveyed by the community and PT IIS and coordinate with related parties. d. The Integrated Team for Handling Social Conflicts will invite / bring back related parties, and PT IIS to bring competent parties to make decisions. <p>Meeting on August 2, 2021:</p> <ol style="list-style-type: none"> a. Requesting information from BPN stating that PT IIS land is included in the Tanjung Paku Village area b. Get an overview from a neighboring village about the Tanjung Paku Village area 	
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		<p>c. Field observations/reviews will be carried out jointly in the third week of August.</p> <p>d. At a follow-up meeting, which is planned to be chaired by the Regent, PT IIS and the community of Tanjung Paku Village are asked to bring other supporting documents.</p> <p>Based on document studies and field visits, it is shown that:</p> <p>a. Based on the field visit, it was shown that on June 23, 2021, the community occupied PT IIS's oil palm plantation area around Blocks E93D and E93C where both blocks are in HGU Certificate No. 036 and No. 044.</p> <p>b. Residents of Tanjung Paku Village marked the occupied Block with red paint on electricity poles at the edge of the transport road and on palm trees that read "Tj Paku".</p> <p>c. Based on field verification, it shows that Blocks E93D and E93C are among HGU No. 06, 07 and 28 where during the field visit the condition of the stakes looked well maintained, the number of the stakes was clearly visible.</p> <p>d. The condition of the E93D and E93C blocks did not indicate any harvesting or plant maintenance activities.</p> <p>e. Blocks E93D and E93C are positioned between the Pulau Pauh/Merlung WD Plasma and Rantau Badak WD Plasma.</p> <p>Based on management's statement, it is stated that the Company has decided to follow the process of resolving land conflicts with Tanjung Paku Village which is mediated by the Regional Government of Tanjung Jabung Barat Regency (National and Political Unity Agency) as stipulated in the SOP for Land Conflict Resolution.</p>	
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		<p>Based on the verification of documents and information from the relevant agencies, it also shows that PT IIS has several procedures for resolving disputes, namely:</p> <ul style="list-style-type: none"> a. Standard Operating Procedure (SOP) No. AA-GL-5003.1-RI concerning Land Conflict Management which was approved by management on December 5, 2009 and has undergone revision I on August 22, 2011. In 2015 the company revised II Mechanism for handling conflicts as outlined in the Standard Operating Procedure (SOP). No. AA-GL-5003.1-R2 regarding Land Conflict Management which was approved by management on 08 May 2015. b. SOP Penanganan Keluhan Masyarakat No: AA-GL-510.1-R0, dated 1 January 2013. <ul style="list-style-type: none"> <i>4.1 Reporting Public Complaints</i> <i>4.1.1 General Scope: "Procedures ... for handling complaints from Concerned Parties including organizations, people, groups or institutions ...". In order for the Company to respond appropriately to the Parties' complaints in order to be identified, anonymous questions or complaints (without identity / cannot be traced by their identity) cannot be accepted. "</i> <i>4.2 Procedure for Handling / Resolving Community Complaints</i> <i>4.2.5 "This form identifies the person or organization that submitted the complaint, along with the basis of the complaint and the background of the acknowledgment (detailed description of the incident, name of the Party involved, the specific time when the event was the reason for the complaint and the basis of the complaint).</i> <i>4.2.12 "... The company will endeavour to resolve complaints within 15 working days".</i> c. The mechanism used for handling employee complaints is as outlined in the SOP document No. AA-HR-308.5-R0, Rev 0 (SOP for 	
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		Submission and Resolution of Employee Complaints) signed by Management on December 11, 2009. In the SOP, the procedures for submitting and handling employee complaints have been described, starting from how to submit complaints, the time for giving responses, parties who is responsible for responding to every employee complaint and documenting every employee complaint.	
4.2.4	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.	As described in indicator 4.2.1 which explains that based on public consultations with community leaders in Pulau Pauh Village and related agencies, it is stated that so far there have been no issues regarding complaints submitted by the surrounding community.	Complied
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>In addition to the Amdal Document, the company In 2011, the company has compiled a Social Impact assessment document in collaboration with the Forestry Faculty of IPB with the focus of the study covering;</p> <ul style="list-style-type: none"> a. The relationship between companies from several forms of socio-economic interaction with surrounding stakeholders. b. People's perceptions, expectations and desires of the company. c. Forms of land ownership d. Social and economic activities needed by the community. <p>Chapter VI specifically discusses the impact of the existence of PT Inti Indosawit Subur on plasma farmers/communities around, both positive and negative impacts.</p> <p>In the SIA document, it is explained that the Social Impact Assessment activity was prepared through open interviews, Focus Group</p>	Complied

		<p>Discussions/FGDs and filling out questionnaires to the surrounding village communities (including Plasma) and employees of PT IIS Tungkal Ulu.</p> <p>Based on document verification and interviews with the people of Pulau Pauh Village, it is stated that PT IIS-Tungkal Ulu has a CSR program every year which is stated in the "Social Responsibility Program/CSR" document, consisting of:</p> <ol style="list-style-type: none"> a. Social Sector such as Assistance to Purchase Equipment for the "Asosiasi Seniman Kuda Kepang" of Merlung Village on April 12, 2021. b. Economic sector, such as: duck farming packages for the poor in Merlung, Pauh Island and Rantau Benar villages which were realized on 6 July 2021 and 22 July 2021; Assistance for the motorcycle Wash business for the Lampisi Village youth groups (SP2) which was realized on April 21, 2021. c. Education sector, such as: Sustainable Palm Oil School SMKN 6 Tanjung Jabung Barat in Lubuk Kambing (not yet realized). d. Health Sector: Free Health Check-up in Rantau Benar Village and Pauh Island (Covid-19 Vaccine) – not yet realized. e. Infrastructure sector, such as: Material Assistance for the Construction of the Jannatun Na'im Mosque in Tanjung Benanak Village (SP3) which was realized on May 24, 2021; Material Assistance for the Construction of the Baitul Rahman Mosque in Merlung Village which was realized on March 23, 2021; Material Assistance for the Repair of the Lampisi Village GKPI Church / SP 2 which was realized on March 22, 2021. f. Environmental Sector : Planting Reforestation Trees to maintain Ecosystem Balance (not yet realized). 	
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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	<p>(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>	<p>Mill and Estate:</p> <p>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, sample seen:</p> <ul style="list-style-type: none"> - Izin Prinsip (Principle permit) No. KB.320/859/ Mentan/XI/1983, dated 7 November 1983, approved by Agriculture Ministry for PT. IIS – PIR Trans (+ 65,000 ha) and Izin Lokasi No.746, year 2006 for 1,111 ha in Kecamatan Merlung, Kabupaten Tanjung Jabung Barat, issued by Bupati Tanjung Jabung Barat. - Izin Usaha Perkebunan – Surat Pendaftaran Usaha Perkebunan/SPUP (Plantation Operational permit) No.187/Mentanhut/VII/2000, dated 3 November 2000 (±4,759.20 ha). - Izin Usaha Perkebunan Budidaya/IUP B (Plantation operational permit) No.625, year 2008, dated 26 September 2008 (± 1,111 ha). - Forest area release through “Surat Keputusan Menteri Kehutanan No.494/Kpts-II/1991 tentang Pelepasan areal hutan seluas 17,500 Ha terletak di Kelompok Hutan S. Lampisi-S. Palik-palik - Kabupaten Dati II Tanjung Jabung dan Seluas 9,356Ha terletak di Kelompok Hutan S. Kehidupan-S. Singoan, Kabupaten Batanghari, Provinsi Jambi untuk Usaha Budidaya perkebunan dengan pola PIR-TRANS atas nama PT. Inti Indosawit Subur” dated 7 August 1991. - Renewal HGU No.61/HGU/BPN/2005, dated 2 June 2005, approved by BPN (3,503.02 ha). - HGU No.82/HGU/BPN RI/2014, dated 15 May 2014 (1,053.34 ha). - Land Application Permit: No.503.8/01/KPPT/2012 dated 17 September 2013.
		Complied

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		<ul style="list-style-type: none"> - Surface water use permit No.503.30/01/KPPT/2011, dated 5 July 2011. - Pesticide Store permit No.560/386/4.3/ DSTKT. - Izin operational pabrik (Mill operation permit) No.532/T/Industri/2005 <p>Smallholder:</p> <p>Plasma management of Tungkal Ulu conducted the evaluation of laws and regulation compliance each year. Latest updated was on 29 March 2019. During audit, Group manager can demonstrated the document of "Evaluasi Kepatuhan Hukum Kebun Plasma Tungkal Ulu Tahun 2019" 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. For example:</p> <ul style="list-style-type: none"> • Cooperative establishment deed • Private land title • Environmental permit • Palm oil cultivation permit <p>Onsite Audit:</p> <p>Based on interviews with relevant agencies and document verification, it shows that all land managed by PT IIS Tungkal Ulu already has a right to use rights (Hak Guna Usaha) issued by the government.</p> <p>Based on field verification, it shows that the company has properly maintained the boundaries of the HGU and is conducting regular monitoring every 6 months, as stated in the PT Inti Indosawit Subur -</p>	
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		<p>Jambi Boundary Inspection and Maintenance Report document which was conducted on 8-11 June. 2021.(001/LAP/KTU/SSL/02.3/VI/2021.</p> <p>Smallholders: Based on field visits and interviews with sampled farmers, it shows that the plasma land of PT IIS-Tungkal Ulu already has a right of title in the form of a Certificate of Ownership (SHM) issued by the government through the PIR-Trans program. Boundaries between land owned by farmers have been installed in the field in the form of SHM boundary markers or signs in the form of accumulation of oil palm fronds or other signs in the form of planting wood plants along the boundaries of the plots.</p>	
<p>4.4.2</p>	<p>Copies documents evidencing agreement- making processes and negotiated agreements detailing the FPIC process are available and include: 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>Onsite Audit: Based on document verification, it shows that all land managed by PT IIS – Tungkal Ulu already has a right to use rights in the form of Hak Guna Usaha (HGU) issued by the government. The HGU area of PT IIS and the surrounding plasma plantations are part of the government's program to develop Inti-Plasma oil palm plantations through the PIR-Trans scheme. Based on field verification, it shows that the surrounding village communities (5 local villages) have been accommodated in the oil palm plantation development pattern, except for Tanjung Paku village which did not receive the plasma program. Based on interviews with NGOs (WALHI) and other local communities (Pauh Island Village) stated that Tanjung Paku Village at the beginning of the development of the plasma nucleus oil palm plantation withdrew from the program held by the government.</p>	<p>Complied</p>

		<p>In further developments, there is a claim by Tanjung Paku Village on PT IIS's HGU land area of 107 Ha and is still in the process of completion which is facilitated by the government of Tanjung Jabung Barat Regency (Kesbangpol) as described in indicator 4.2.1. Based on interviews with community leaders and residents of Tanjung Paku Village stated that at this time they have appointed legal counsel on this matter to NGOs (Indonesian Forum for the Environment/WALHI and Jambi Farmers Association/PPJ). Based on interviews with the chairman of WALHI and PPJ, it was stated that there were indeed land claims over the HGU area of PT IIS by the residents of Tanjung Paku Village and they were given authority over the process of resolving the conflict.</p> <p>Based on document verification and interviews with the parties, it shows that the conflict over land claims of 107 hectares by the residents of Tanjung Paku Village is currently still in the process of being resolved, facilitated by the Tanjung Jabung Barat Regency Government (Kesbangpol).</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>Based on interviews with the management of PT IIS stated that the management has decided to follow the process of resolving land conflicts with Tanjung Paku Village which is mediated by the Regional Government of Tanjung Jabung Barat Regency (Badan Kesatuan Bangsa and Politics).</p> <p>Based on the field visit, it was shown that the conditions of the disputed blocks E93D and E93C did not indicate any company activities to carry out FFB harvesting or plant maintenance activities. This has been stated in the demands submitted by the residents of Tanjung Paku Village on June 23, 2021 (point 3).</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>Based on the verification of the agreement document at each negotiation in the context of the process of resolving land conflicts with the residents of Tanjung Paku Village, it shows that the document was signed by both parties (PT IIS and Representatives of the Tanjung Paku Villagers) and the party that facilitated (Regional Government of Tanjung Jabung Barat Regency) as well as parties appointed by the residents of Tanjung Paku village as their legal representatives (WALHI-Jambi and PPJ).</p> <p>Based on interviews with the parties involved in the negotiations, it shows that each of them understands the agreement that has been made in the context of the process of resolving the land conflict.</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>Use of the land for oil palm in Tungkal Ulu based on land use title or HGU with total area is 4,556.36 Ha, which consist of 11 HGU certificates. All this area has mapped on "Peta Kebun Tungkal Ulu, Scale 1:35,000". FPIC mechanism and process is available in Land Dispute Resolution procedure (SOP AA-GL5003.1-R1 "Handling of Land Conflicts", dated 22 August 2011). FPIC mechanism is available on the flowchart and part of the process of conflict resolution.</p> <p>Smallholders: There is no changes of smallholders map. All the smallholders plot is permanently owned by the farmers. These lands are given from government as Transmigration Program since 1980's and recognized as legal ownership. Land ownership certificate or "SHM" of all smallholders plots are origin from government land. Each certificate has an appropriate map with measurement by the National Land Department or BPN. Size of smallholders plot average is 2 Hectare.</p>	<p>Complied</p>

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4.4.4	All relevant information is available in appropriate forms and languages, including assessment of impact, proposed benefit sharing, and legal arrangements.	Based on field verification, it shows that each party (Tanjung Paku Villagers and PT IIS) has properly documented every negotiation process carried out in the context of resolving land disputes. The document is available in Indonesian which can be understood by both parties.	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.	Based on document verification and interviews with the parties in the process of resolving the land conflict between Tanjung Paku Village over the PT IIS HGU area of 107 hectares, it shows that currently the settlement process is being facilitated by the Tanjung Jabung Barat Regency government (Kesbangpol) as described in indicator 4.2.1 . Based on interviews with community leaders and residents of Tanjung Village, I stated that at this time they have appointed legal counsel on this matter to NGOs (Indonesian Forum for the Environment/WALHI and Jambi Farmers Association/PPJ). Based on interviews with the chairman of WALHI and PPJ, it was stated that there were indeed land claims over the HGU area of PT IIS by the residents of Tanjung Paku Village and they were given authority over the process of resolving the conflict.	Complied
4.4.6	There is evidence that implementation of agreement negotiated through FPIC is annually reviewed in consultation with affected parties.	Based on document verification and interviews with the parties, it shows that the land claim by the residents of Tanjung Paku Village occurred again in 2021 (23 June 2021) and is currently still in the process of being completed which is facilitated by the local government of Tanjung Jabung Barat Regency. The company already has a land dispute resolution mechanism as outlined in the SOP document AA-GL-5003.1-R2, Rev 2 (SOP for Handling Land Conflicts) which was signed by Management on May 08,	Complied

		2015. The SOP provides for periodic reviews of the results of the agreement. done.	
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.	<p>PT IIS – Tungkal Ulu has been under construction since 1991 through the PIR-TRANS program and there is no indication that PT IIS – Tungkal Ulu is currently acquiring new land for oil palm plantations.</p> <p>If there is a land dispute as described in indicator 4.2.1, the company will use the procedure as stipulated in the Standard Operating Procedure (SOP) document no. AA-GL-5003.1-R2 regarding Land Conflict Management which was approved by management on 08 May 2015.</p>	Complied
4.5.2	(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>PT IIS – Tungkal Ulu has been under construction since 1991 through the PIR-TRANS program and there is no indication that PT IIS – Tungkal Ulu is currently acquiring new land for oil palm plantations.</p> <p>If there is a land dispute as described in indicator 4.2.1, the company will use the procedure as stipulated in the Standard Operating Procedure (SOP) document no. AA-GL-5003.1-R2 regarding Land Conflict Management which was approved by management on 08 May 2015.</p>	Complied
4.5.3	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>PT IIS – Tungkal Ulu has been under construction since 1991 through the PIR-TRANS program and there is no indication that PT IIS – Tungkal Ulu is currently acquiring new land for oil palm plantations.</p> <p>If there is a land dispute as described in indicator 4.2.1, the company will use the procedure as stipulated in the Standard Operating Procedure (SOP) document no. AA-GL-5003.1-R2 regarding Land Conflict Management which was approved by management on 08 May 2015.</p>	Complied

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4.5.4	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>PT IIS – Tungkal Ulu has been under construction since 1991 through the PIR-TRANS program and there is no indication that PT IIS – Tungkal Ulu is currently acquiring new land for oil palm plantations.</p> <p>If there is a land dispute as described in indicator 4.2.1, the company will use the procedure as stipulated in the Standard Operating Procedure (SOP) document no. AA-GL-5003.1-R2 regarding Land Conflict Management which was approved by management on 08 May 2015.</p>	Complied
4.5.5	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>PT IIS – Tungkal Ulu has been under construction since 1991 through the PIR-TRANS program and there is no indication that PT IIS – Tungkal Ulu is currently acquiring new land for oil palm plantations.</p> <p>If there is a land dispute as described in indicator 4.2.1, the company will use the procedure as stipulated in the Standard Operating Procedure (SOP) document no. AA-GL-5003.1-R2 regarding Land Conflict Management which was approved by management on 08 May 2015.</p>	Complied
4.5.6	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>PT IIS – Tungkal Ulu has been under construction since 1991 through the PIR-TRANS program and there is no indication that PT IIS – Tungkal Ulu is currently acquiring new land for oil palm plantations.</p> <p>If there is a land dispute as described in indicator 4.2.1, the company will use the procedure as stipulated in the Standard Operating Procedure (SOP) document no. AA-GL-5003.1-R2 regarding Land Conflict Management which was approved by management on 08 May 2015.</p>	Complied
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	<p>PT IIS – Tungkal Ulu has been under construction since 1991 through the PIR-TRANS program and there is no indication that PT IIS – Tungkal Ulu is currently acquiring new land for oil palm plantations.</p>	Complied

	cases of smallholders benefitting from agrarian reform or anti-drug programmes.	If there is a land dispute as described in indicator 4.2.1, the company will use the procedure as stipulated in the Standard Operating Procedure (SOP) document no. AA-GL-5003.1-R2 regarding Land Conflict Management which was approved by management on 08 May 2015.	
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation.	PT IIS – Tungkal Ulu has been under construction since 1991 through the PIR-TRANS program and there is no indication that PT IIS – Tungkal Ulu is currently acquiring new land for oil palm plantations. If there is a land dispute as described in indicator 4.2.1, the company will use the procedure as stipulated in the Standard Operating Procedure (SOP) document no. AA-GL-5003.1-R2 regarding Land Conflict Management which was approved by management on 08 May 2015.	Complied
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.	PT IIS – Tungkal Ulu has been under construction since 1991 through the PIR-TRANS program and there is no indication that PT IIS – Tungkal Ulu is currently acquiring new land for oil palm plantations. If there is a land dispute as described in indicator 4.2.1, the company will use the procedure as stipulated in the Standard Operating Procedure (SOP) document no. AA-GL-5003.1-R2 regarding Land Conflict Management which was approved by management on 08 May 2015.	Complied
4.6.2	(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.	PT IIS – Tungkal Ulu has been under construction since 1991 through the PIR-TRANS program and there is no indication that PT IIS – Tungkal Ulu is currently acquiring new land for oil palm plantations. If there is a land dispute as described in indicator 4.2.1, the company will use the procedure as stipulated in the Standard Operating Procedure	Complied

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		(SOP) document no. AA-GL-5003.1-R2 regarding Land Conflict Management which was approved by management on 08 May 2015.	
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).	<p>PT IIS – Tungkal Ulu has been under construction since 1991 through the PIR-TRANS program and there is no indication that PT IIS – Tungkal Ulu is currently acquiring new land for oil palm plantations.</p> <p>If there is a land dispute as described in indicator 4.2.1, the company will use the procedure as stipulated in the Standard Operating Procedure (SOP) document no. AA-GL-5003.1-R2 regarding Land Conflict Management which was approved by management on 08 May 2015.</p>	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>PT IIS – Tungkal Ulu has been under construction since 1991 through the PIR-TRANS program and there is no indication that PT IIS – Tungkal Ulu is currently acquiring new land for oil palm plantations.</p> <p>If there is a land dispute as described in indicator 4.2.1, the company will use the procedure as stipulated in the Standard Operating Procedure (SOP) document no. AA-GL-5003.1-R2 regarding Land Conflict Management which was approved by management on 08 May 2015.</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>PT IIS – Tungkal Ulu has been under construction since 1991 through the PIR-TRANS program and there is no indication that PT IIS – Tungkal Ulu is currently acquiring new land for oil palm plantations.</p> <p>If there is a land dispute as described in indicator 4.2.1, the company will use the procedure as stipulated in the Standard Operating Procedure (SOP) document no. AA-GL-5003.1-R2 regarding Land Conflict Management which was approved by management on 08 May 2015.</p>	Complied

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4.7.2	(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.	PT IIS – Tungkal Ulu has been under construction since 1991 through the PIR-TRANS program and there is no indication that PT IIS – Tungkal Ulu is currently acquiring new land for oil palm plantations. If there is a land dispute as described in indicator 4.2.1, the company will use the procedure as stipulated in the Standard Operating Procedure (SOP) document no. AA-GL-5003.1-R2 regarding Land Conflict Management which was approved by management on 08 May 2015.	Complied
4.7.3	Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.	PT IIS – Tungkal Ulu has been under construction since 1991 through the PIR-TRANS program and there is no indication that PT IIS – Tungkal Ulu is currently acquiring new land for oil palm plantations. If there is a land dispute as described in indicator 4.2.1, the company will use the procedure as stipulated in the Standard Operating Procedure (SOP) document no. AA-GL-5003.1-R2 regarding Land Conflict Management which was approved by management on 08 May 2015.	Complied
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.			
4.8.1	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 any compensation was accepted following a documented process of FPIC.	PT IIS - Tungkal Ulu is a palm oil company that was built in conjunction with the government's program in the development of nucleus - plasma oil palm plantations with the PIR-TRANS scheme since 1991. The company has shown land legal documents ranging from Permits for Release of Forest Areas, Location Permits to certificate of Hak Guna Usaha (HGU) which is currently part of the HGU extension period. However, as described in indicator 4.2.1, there is currently a land conflict between PT IIS and the people of Tanjung Paku Village whose settlement process is facilitated by the Regional Government of Tanjung Jabung Barat Regency.	Complied

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		<p>The company has developed a land dispute resolution procedure in the form of Standard Operating Procedure (SOP) No. AA-GL-5003.1-RI concerning Land Conflict Management which was approved by management on December 5, 2009 and has undergone revision I on August 22, 2011. In 2015 the company revised II Mechanism for handling conflicts as outlined in the Standard Operating Procedure (SOP). No. AA-GL-5003.1-R2 regarding Land Conflict Management which was approved by management on 08 May 2015.</p> <p>The mechanism has adjusted to the 2015 FPIC Guide for RSPO Member where in the SOP it has regulated the delivery of information, negotiations, measurement of common boundaries and others including the involvement of other related parties and parties whose land borders conflict lands.</p> <p>Based on interviews with the management of PT IIS stated that the management has decided to follow the process of resolving land conflicts with Tanjung Paku Village which is mediated by the Regional Government of Tanjung Jabung Barat Regency (Badan Kesatuan Bangsa and Politics).</p> <p>Based on the field visit, it was shown that the conditions of the disputed blocks E93D and E93C did not indicate any company activities to carry out FFB harvesting or plant maintenance activities. This has been stated in the demands submitted by the residents of Tanjung Paku Village on June 23, 2021 (point 3).</p>	
4.8.2	<p>(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see</p>	<p>However, as described in indicator 4.2.1, there is currently a land conflict between PT IIS and the people of Tanjung Paku Village whose</p>	Complied

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	<p>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>settlement process is facilitated by the Regional Government of Tanjung Jabung Barat Regency.</p> <p>The company has developed a land dispute resolution procedure in the form of Standard Operating Procedure (SOP) No. AA-GL-5003.1-RI concerning Land Conflict Management which was approved by management on December 5, 2009 and has undergone revision I on August 22, 2011. In 2015 the company revised II Mechanism for handling conflicts as outlined in the Standard Operating Procedure (SOP). No. AA-GL-5003.1-R2 regarding Land Conflict Management which was approved by management on 08 May 2015.</p> <p>The mechanism has adjusted to the 2015 FPIC Guide for RSPO Member where in the SOP it has regulated the delivery of information, negotiations, measurement of common boundaries and others including the involvement of other related parties and parties whose land borders conflict lands.</p> <p>Based on interviews with the management of PT IIS stated that the management has decided to follow the process of resolving land conflicts with Tanjung Paku Village which is mediated by the Regional Government of Tanjung Jabung Barat Regency (Badan Kesatuan Bangsa and Politics).</p> <p>Based on the field visit, it was shown that the conditions of the disputed blocks E93D and E93C did not indicate any company activities to carry out FFB harvesting or plant maintenance activities. This has been stated in the demands submitted by the residents of Tanjung Paku Village on June 23, 2021 (point 3).</p>	
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<p>4.8.3</p>	<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>However, as described in indicator 4.2.1, there is currently a land conflict between PT IIS and the people of Tanjung Paku Village whose settlement process is facilitated by the Regional Government of Tanjung Jabung Barat Regency.</p> <p>The company has developed a land dispute resolution procedure in the form of Standard Operating Procedure (SOP) No. AA-GL-5003.1-RI concerning Land Conflict Management which was approved by management on December 5, 2009 and has undergone revision I on August 22, 2011. In 2015 the company revised II Mechanism for handling conflicts as outlined in the Standard Operating Procedure (SOP). No. AA-GL-5003.1-R2 regarding Land Conflict Management which was approved by management on 08 May 2015.</p> <p>The mechanism has adjusted to the 2015 FPIC Guide for RSPO Member where in the SOP it has regulated the delivery of information, negotiations, measurement of common boundaries and others including the involvement of other related parties and parties whose land borders conflict lands.</p> <p>Based on interviews with the management of PT IIS stated that the management has decided to follow the process of resolving land conflicts with Tanjung Paku Village which is mediated by the Regional Government of Tanjung Jabung Barat Regency (Badan Kesatuan Bangsa and Politics).</p> <p>Based on the field visit, it was shown that the conditions of the disputed blocks E93D and E93C did not indicate any company activities to carry out FFB harvesting or plant maintenance activities. This has been stated</p>	<p>Complied</p>
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		<p>in the demands submitted by the residents of Tanjung Paku Village on June 23, 2021 (point 3).</p>	
<p>4.8.4</p>	<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>However, as described in indicator 4.2.1, there is currently a land conflict between PT IIS and the people of Tanjung Paku Village whose settlement process is facilitated by the Regional Government of Tanjung Jabung Barat Regency.</p> <p>The company has developed a land dispute resolution procedure in the form of Standard Operating Procedure (SOP) No. AA-GL-5003.1-RI concerning Land Conflict Management which was approved by management on December 5, 2009 and has undergone revision I on August 22, 2011. In 2015 the company revised II Mechanism for handling conflicts as outlined in the Standard Operating Procedure (SOP). No. AA-GL-5003.1-R2 regarding Land Conflict Management which was approved by management on 08 May 2015.</p> <p>The mechanism has adjusted to the 2015 FPIC Guide for RSPO Member where in the SOP it has regulated the delivery of information, negotiations, measurement of common boundaries and others including the involvement of other related parties and parties whose land borders conflict lands.</p> <p>Based on interviews with the management of PT IIS stated that the management has decided to follow the process of resolving land conflicts with Tanjung Paku Village which is mediated by the Regional Government of Tanjung Jabung Barat Regency (Badan Kesatuan Bangsa and Politics).</p>	<p>Complied</p>

		Based on the field visit, it was shown that the conditions of the disputed blocks E93D and E93C did not indicate any company activities to carry out FFB harvesting or plant maintenance activities. This has been stated in the demands submitted by the residents of Tanjung Paku Village on June 23, 2021 (point 3).																					
<p>Principle 5: Support smallholder inclusion 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>																							
5.1.1	Current and previous period prices for FFB are publicly available and accessible by smallholders.	<p>FFB price for Scheme Smallholders are based on "Hasil Penetapan Harga TBS Kelapa Sawit Provinsi Jambi" issued by FFB pricing team of Riau Province. It was available FFB price letter No.47/TPH TBS-XII/2020 dated 30 Oct 2020 for period 1 – 7 Nov 2020.</p> <p>The price are:</p> <table border="1"> <thead> <tr> <th>Oil palm age (year)</th> <th>FFB price (Rp/kg)</th> </tr> </thead> <tbody> <tr><td>3</td><td>1,337.63</td></tr> <tr><td>4</td><td>1,448.84</td></tr> <tr><td>5</td><td>1,583.39</td></tr> <tr><td>6</td><td>1,621.40</td></tr> <tr><td>7</td><td>1,684.61</td></tr> <tr><td>8</td><td>1,731.11</td></tr> <tr><td>9</td><td>1,771.79</td></tr> <tr><td>10-20</td><td>1,813.27</td></tr> <tr><td>21</td><td>1,736.28</td></tr> </tbody> </table>	Oil palm age (year)	FFB price (Rp/kg)	3	1,337.63	4	1,448.84	5	1,583.39	6	1,621.40	7	1,684.61	8	1,731.11	9	1,771.79	10-20	1,813.27	21	1,736.28	Complied
Oil palm age (year)	FFB price (Rp/kg)																						
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		<table border="1" data-bbox="1133 362 1503 549"> <tr> <td>22</td> <td>1,727.56</td> </tr> <tr> <td>23</td> <td>1,720.30</td> </tr> <tr> <td>24</td> <td>1,647.66</td> </tr> <tr> <td>25</td> <td>1,607.71</td> </tr> </table> <p data-bbox="1133 596 1977 724">KUD get the information of FFB price from “Tim Penetapan Harga TBS” (FFB pricing team of Jambi Province), and FFB price have been made available by the company in the announcement board in front of the Plasma Tungkal Ulu office.</p> <p data-bbox="1133 775 1308 802">Onsite Audit:</p> <p data-bbox="1133 817 1977 1038">During the audit, Kebun Plasma Tungkal Ulu has showed the FFB payment receipt period July 2021 in accordance with official FFB price that issued by FFB Pricing Team of Jambi 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 Sawit Kita and KUD Sari Bumi period July 2021. All payments have been complied with the pricing that stipulated.</p>	22	1,727.56	23	1,720.30	24	1,647.66	25	1,607.71	
22	1,727.56										
23	1,720.30										
24	1,647.66										
25	1,607.71										
5.1.2	<p data-bbox="244 1099 1108 1161">(C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.</p>	<p data-bbox="1133 1099 1977 1289">Based on information gathered from the plasma manager and CSV staff obtained that the information of price directly informed by the purchasing department to the respective suppliers through the short message application such as Whatsapp. During the field visit to the respective KUD’s informed that price updating by board of KUD’s board in office.</p>	Complied								

		In addition, the price information for outgrowers or CSV also updated by purchasing department. There were no issues on this.	
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 – Tungkal Ulu Plasma has had 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 Tungkal Ulu Plasma period 2020 has been handover on 10 December 2020. Tungkal Ulu Plasma has held the training for smallholders namely “Alternative Income during Replanting Training” on November 2019 and January 2020 located in Bogor – Indonesia. Those training objectives is to prepare the smallholder to facing their monthly income situation during the replanting period.</p> <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>	Complied
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-	The smallholder’s member of Tungkal Ulu Plasma originated from government transmigration program on 1990 – 1991. Mostly from East Java, West Java and local area (Jambi Province). Based on information obtained during the onsite audit known that some of smallholders’	Complied

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	payments through FFB price reductions for replanting and/or, other support mechanisms where applicable.	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.	
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe.	All smallholders which registered as supply bases to Tungkal Ulu POM have agreement with PT. Inti Indosawit Subur – Tungkal Ulu. The timeframe of the contract is 1 cycle period (25 years) since first planting.	Complied
5.1.6	(C) Agreed payments are made in a timely manner and receipts specifying price, weigh, deductions and amount paid are given.	Smallholders received the daily and monthly report for FFB's that deliver to Tungkal Ulu POM. Price, weigh, deduction and amount paid are clearly described within the document. Payment to smallholders in monthly basis.	Complied
5.1.7	Weighing equipment is verified by an independent third party on a regular basis.	Weighbridge in Tungkal Ulu POM is verified by government agency in annual basis. Latest verification was performed on 15 October 2020, based on "Surat Keterangan Hasil Pengujian" (calibration certificate): <ul style="list-style-type: none"> - No.510.3/UPTMET/SKHP/2020/278 for Avery Weigh Tronix; model E1205; S/N 074750282; capacity 50,000 kg. - No.510.3/UPTMET/SKHP/2020/279 for Avery Weigh Tronix; model ZM510; S/N 184350013; capacity 50,000 kg Certificates issued by "UPT Metrologi Legal – Dinas Koperasi Usaha Kecil dan Menengah, Perindustrian dan Perdagangan Kabupaten Tanjung Jabung Barat", valid until 11 October 2021.	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.	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.	Complied

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		<p>For independent Smallholder, support is given in form of CSV (Create Share Value). Member of CSV which have cooperation with the company for example is Gapoktan Maju Jaya and Gapoktan Usaha Berkat. 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>	
<p>5.1.9</p>	<p>(C) The unit of certification has a grievance mechanism for smallholders, and all grievances raised are dealt with in a timely manner.</p>	<p>The 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-engaduan.</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>	<p>Complied</p>

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		<p>Internal Reporting:</p> <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>Confidential reports may be submitted through email or telephone to protect the identity of the reporter.</i></p>	<p>Channel/Remarks</p> <p><i>Log Books:</i></p> <ul style="list-style-type: none"> • <i>Disruption</i> • <i>Complaint</i> <p><i>Poster on Whistleblowing is placed in every office of Asian Agri.</i></p> <ul style="list-style-type: none"> • <i>Telephone: +62 811 910 7916</i> • <i>Email: attention@asianagri.com</i> 	
		<p>External Reporting:</p> <p><i>Stakeholders of Asian Agri including but not limited to Government, smallholders,</i></p>	<p>Channel/Remarks</p> <ul style="list-style-type: none"> • <i>Email: grievance@asianagri.com</i> 	

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		<p><i>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>Address:</i> <i>Jl. MH Thamrin No. 31</i> <i>Jakarta 10230</i> <i>Indonesia</i> • <i>Fax: +62 21 230 1120</i> <i>Attn.: Grievance</i> <i>Secretariat</i> <p><i>Grievance submissions should be made using the Grievance Submission Form.</i></p>	
		<p><i>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.</i></p>		
		<p>Scheme smallholders: 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 provided in flow chart and available in each KUD's offices.</p>		

		Until this audit, there was no grievance from KUD's member.	
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 – Tungkal Ulu 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.</p> <p>Kebun Luar Tungkal Ulu has more than 4,600 smallholders from 10 KUD's. Some of members are women which had vote right in their KUD's.</p>	Complied
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).	PT IIS – Tungkal Ulu 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.	Complied
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	<p>PT IIS – Tungkal Ulu 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.</p> <p>Kebun Luar Tungkal Ulu has more than 4,600 smallholders from 10 KUD's. Some of members are women which had vote right in their KUD's.</p>	Complied
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	PT IIS – Tungkal Ulu 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.	Complied

5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	<p>PT IIS – Tungkal Ulu 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.</p> <p>Kebun Luar Tungkal Ulu has more than 4,600 smallholders from 10 KUD's. Some of members are women which had vote right in their KUD's.</p>	Complied
<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>			
6.1.1	<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 – Tungkal Ulu has established Company Policy under "Kebijakan Perusahaan", was signed by Managing Director on 1st December 2014. In point 13 mentioned: "Company Treats employees fairly, whether in terms of acceptance, judgment, conditions and work environment, and representation irrespective of race, tribe, caste, national origin, religion/faith, disability, gender, sexual orientation, union membership, political affiliation and/or age".</p> <p>This policy has been informed to all employees and being placed into noticed board in public area and easily accessed.</p> <p>PT Inti Indosawit Subur – Tungkal Ulu has also SOP for employment recruitment According on SOP: AA-HR-305.2-R0 dated 1 February 2009 about "<i>Penerimaan Karyawan Baru</i>" (Recruitment and Selection of Employee), the company will accept new employee based on their capabilities and qualifications. This policy has been communicated to worker. The policy described the organization recognize and respect to</p>	Complied

		<p>the rights of local, migrant or urban worker.</p> <p>Workers register for mill and estates mentioned that all workers came from different backgrounds (race, religion, gender, etc). Ethnical diversity of worker and during interview with workers, no discrimination was identified based on religion, ethnic, gender. No evidence of discrimination found during the audit.</p> <p>Company provided working tools to the workers, relevant to the nature of the work performed.</p> <p>This employee list proves that the company does not practice any form of discrimination, employees are given the opportunity to work regardless of ethnicity, religion, origin, and gender:</p> <p>Data verified: List of Employee June 2021 "Daftar Karyawan" there were not found any evidence of discrimination and migrant workers.</p> <p><u>Smallholders</u></p> <p>All KUD's (KUD Sawit Kita, Karya Kita, Karya Jaya, Panca Mukti, Sari Bumi and KUD Sawit Mulia) has established the policy related to equal opportunity and treatment for work under "Kebijakan Koperasi" dated 2nd December 2020, was signed by Head of Cooperative.</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>PT Inti Indosawit Subur – Tungkal Ulu has provided a policy in relation to this indicator requirement, stated in "Kebijakan Perusahaan", dated 1st December 2014.</p> <p>Based on interview with employee in POM and Estate, PT Inti Indosawit Subur – Tungkal Ulu has prepared the policy related to anti-discrimination was strictly enforced. They were no cases of discrimination in company. Document review of workers "Daftar Karyawan" there were not find any evidence of discrimination.</p>	Complied

		<p>Data verified: List of Employee June 2021 "Daftar Karyawan" there were not found any evidence of discrimination and migrant workers</p> <p><u>Smallholders</u> All KUD's (KUD Sawit Kita, Karya Kita, Karya Jaya, Panca Mukti, Sari Bumi and KUD Sawit Mulia) has clearly stated the policy to provide equal opportunity policy to all workers as written in "Kebijakan Koperasi". During field audit, it was not found discrimination against gender, tribe, religion and race. All workers have the right and obligation in accordance to the type of work.</p>	
<p>6.1.3</p>	<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 – Tungkal Ulu has had a SOP related to new employment recruitment. According on SOP Rekrutment dan Seleksi Karyawan No. SOP: AA-HR-305.2-R0 dated 1 February 2009 regarding "<i>Penerimaan Karyawan Baru</i>" (Requitment and Selection of Employee), the company will accept new employee based on their capabilities and qualifications. This policy has been communicated to worker.</p> <p>This procedure ware communicated to all employees in the workplace and stakeholders.</p> <p>There are two types of employees that are applied in PT Inti Indosawit Subur – Tungkal Ulu, which are permanent employees (known as SKU-B and SKU-H) and daily workers (known as BHL/PHL). Workers register for mill and estates mentioned that all workers came from different backgrounds (race, religion, gender, etc). Ethnical diversity of worker and during interview with workers, no discrimination was identified based on religion, ethnic, gender. No evidence of discrimination found during the audit.</p> <p>Permanent employees (SKU-H and SKU-B) is confirmed under the joint Collective Labour Agreement (PKB), while the Daily worker with the daily</p>	<p>Complied</p>

		<p>work agreement with a minimum validity period of 1 year.</p> <p>Based on interview with the HR Dept., that recruitment of employees is based on an analysis of workforce needs and within it has considered, the required competencies, experience and expertise required. For this reason, employee acceptance tests and interviews will be conducted. Employee assessments are always carried out every 6 months as a basis for being able to promote positions or levels/groups which will affect to the monthly salary.</p> <p>Smallholder: Based on document sampled verification at (KUD Sawit Kita, Karya Kita, Karya Jaya, Panca Mukti, Sari Bumi and KUD Sawit Mulia), they understand no forced labor or trafficked labor allowed.</p> <p>Most of the farmers are managed their land independently. All the workers are considered as casual workers. The workers are hired based on verbal agreement related to rate per piece of work, payment system, working tool provision, etc. No work performed based on debt bond.</p>	
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>Based on interview with nurse and female workers, pregnancy testing is applicable for all female workers without discrimination.</p> <p>There is a gender committee actively meets and discussing general agenda and other issue related to handling sexual harassment, dissemination of sexual harassment prevention.</p> <p>Based on interview with management representatives, the company has implemented the protection of women reproductive rights, in form of</p>	Complied

		<p>maternal leave, period leave, and regular pregnancy check for female sprayers and strictly prohibit pregnant and/or breastfeeding female worker applying pesticides. The latest pregnancy test July 2021</p>	
<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>PT Inti Indosawit Subur – Tungkal Ulu has formed a Gender Committee at Tungkal Ulu Estate and Mill. Based on the Gender Committee Organizational Structure was stated on 15 February 2020. Gender committees consisting of representatives of all units in the Tungkal Ulu Group play a role in: addressing issues related to women's rights and counselling for women workers who experience acts of violence and sexual harassment and other issues related to women workers.</p> <p>In 2021 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"> • Improving maternal and child health through Posyandu (integrated service post), immunization and vitamin supplement activities. • Conduct regular gender committee meetings at least every 4 months • Provision of supplementary food (during Posyandu) • Sports activities for employees • Environmental cleanliness in residential areas • Assessment of healthy housing for employees • Religious activity <p>The regular monthly gender committee meeting was held on 13 March 2021 which discussed the protection of the rights of women workers from the company, the meeting was attended by 8 representatives of women workers from each affair (a list of attendance can be shown at the time of the audit). Based on the records of the routine meeting and interviews with management, that during the period 2021 there were no cases related to women workers.</p>	<p>Complied</p>

6.1.6	There is evidence of equal pay for the same work scope.	<p>Company has had state about the wages for workers base on Decree of Governor of Jambi SK No. 1308/KEP.GUB/DISNAKERTRANS-3.3/2019, dated 3 November 2019; regarding: "<i>Penetapan Upah Minimum Sektoral Kabupaten Tanjung Jabung Barat Tahun 2020</i>" amount of IDR 2,685,000. UMP for year 2021 as per Decree of Governor of Jambi SK No. 883/KEP.GUB/DISNAKERTRANS-3.3/2020 dated 2 November 2020 regarding "<i>Penetapan Upah Minimum Propinsi Jambi Tahun 2021</i>" amount of IDR 2,630,162.13.</p> <p>The Department of HRD (Manager HRD RO3) has issued Memorandum 002/HR-RO3/MEMO/02/2021 on 1 March 2021 related wages for year 2021 is 2,769,040.5 per month (25 Working Days) or equal to IDR 110,761.62 per day. The wages that have been set by company is higher than the UMP of Jambi Province 2021. The company has also given rice allowance for the workers, which is 15 kg/month for each worker, 9 kg/month for wife of workers and 7.5 kg/month for child of workers (maximum 3 children). The price of rice in August 2021 is IDR 9,500/kg.</p> <p>Salary scale structure for the period 2021 for all level of workers has shown during audit, this structure is based on Decree of Governor of Jambi SK No. 883/KEP.GUB/DISNAKERTRANS-3.3/2020 dated 2 November 2020.</p> <p>The company has provided a scripts/slip salary to employees, salary slip contains basic salary, allowances, premium, labor health coverage (<i>BPJS Tenaga Kerja and Kesehatan</i>) and deduction.</p> <p>Based on document review shown that the company has given equal pay/salary for the same work scope, including <i>natura</i> allowance.</p> <p>Taken sample of salary slip for period August 2021:</p>	Complied

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		<ul style="list-style-type: none"> • Sawaludin-Harvester (PHL) basic IDR 1,329,144 (working days: 12 days), premium IDR 60,000, deduction (BPJS) IDR 83,070, received IDR 1,306,074. • Rokiah Zaini – Upkeep (PHL) basic IDR 996,858 (working days: 9 days), premium IDR 45,000, deduction (BPJS) IDR 83,070, received 958,788. • Siswo – Mechanic (SKU), basic IDR 2,687,000, premium IDR 300,000, overtime IDR 3,239,243, deduction (BPJS IDR 112,574, Koperasi IDR 195,300), Electric Allowance IDR 40,000, total received IDR 5,958,369. • Abednego - operator (SKU), basic IDR 2,771,400, premium IDR 4,202,745, deduction (BPJS) IDR 106,843, electric allowance IDR 40,000, total received 6,849,180. <p>Smallholder:</p> <p>The workers at KUD were paid based on daily rate and only pay when they have work. However, individual members have adjusted the worker payment, referring to the government regulation. The wage has been given monthly are calculated based on tonnage of FFB harvested per rotation, amounting to IDR 150,000/ton of FFB, working for 2-3 to reach 1 ton. Based on the verification of data on casual working wages at Tungkal Ulu Plasma, has shown that the wage is in accordance with local government regulations of Jambi Province.</p>	
<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>			

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6.2.1	<p>(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages and explained to them in language they understand.</p> <p>- Critical (Major) Comply -</p>	<p>The company have established work agreement for permanent employees through Collective Labor Agreement (PKB) 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 Employment on 8 April 2018.</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 provided is based on waging regulation (Decree of Governor of Jambi) valid as of 1 January 2021.</p> <p>The Collective Labor Agreement (PKB 2018-2020 period) and the daily labour contract of the wage was presented in Bahasa Indonesia, based on interview the workers has understood accordingly.</p> <p>Determination of wage for period 2021 is based on Decree of Governor of Jambi SK No. 883/KEP.GUB/DISNAKERTRANS-3.3/2020 dated 2 November 2020 regarding "<i>Penetapan Upah Minimum Propinsi Jambi Tahun 2021</i>" amount of IDR 2,630,162.13. The Department of HRD (Manger HRD RO3) also issued Memorandum 002/HR-RO3/MEMO/02/2021 on 1 March 2021 related wages for year 2021 is 2,769,040.5 per month (25 Working Days) or equal to IDR 110,761.62 per day. The wages that have been set by company is higher than the UMP of Jambi Province 2021. The company has also given rice allowance for the workers, which is 15 kg/month for each worker, 9 kg/month for wife of workers and 7.5 kg/month for child of workers (maximum 3 children). The price of rice in August 2021 is IDR 9,500/kg.</p> <p>Several examples of payslips are described above 6.1.6.</p>	Complied
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</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</p>	Complied

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	<p>dismissal, period of notice, etc. in Comply with national legal requirements) and payroll documents give accurate information on compensation for all work performed, including work done by family members.</p> <p>- Critical (Major) Comply -</p>	<p>(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 Jambi) valid as of 1 January 2021.</p> <p>Determination of wages (including benefits and other benefit), working hours (including hours and overtime pay) and working days have been regulated in the PKB Period 2018-2020 in Article V; <i>Upah</i> - Wages, 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 has been given for the workers, which is 15 kg/month for each worker, 9 kg/month for wife and 7.5 kg/month for child of workers (maximum 3 children).</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>Provisions related to manpower have fulfilled the laws and regulations namely UU No. 13 of 2003 concerning Manpower - Ketenagakerjaan.</p>	
6.2.3	<p>(C) There is evidence of legal Comply for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave,</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</p>	Complied

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	<p>reasons for dismissal, period of notice and other legal labour requirements.</p> <p>- Critical (Major) Comply -</p>	<p>(maximum 40 hours per week and working from Monday to Saturday) and the wages has provided based on regulation.</p> <p>Determination of wages (including benefits and other benefit), working hours (including hours and overtime pay) and working days have been regulated in the PKB Period 2018-2020 in Article V; <i>Upah</i> - Wages, 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 has been given for the workers, which is 15 kg/month for each worker, 9 kg/month for wife and 7.5 kg/month for child of workers (maximum 3 children).</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>Provisions related to manpower have fulfilled the laws and regulations namely UU No. 13 of 2003 concerning Manpower - Ketenagakerjaan.</p>	
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<p>6.2.4</p>	<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. National laws, or in their absence the ILO Guidance on Workers’ Housing Recommendation No. 115, are used. 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>- Critical (Major) Comply -</p>	<p>The company has provided adequate facilities for the workers, including the basic need such as electricity and water. Detail of company facilities for employees are as follows:</p> <p>PT Inti Indosawit Subur – Tungkal Ulu has provided adequate housing with electrical and clean water supply, medical clinic, sport facilities, religious facilities, education facilities and other amenities. Based on field inspection, the facilities found to be in good condition. The company has prepared facilities for their workers.</p> <p>Record seen:</p> <p>Data dan Layout of Public Facilities in Tungkal Ulu Estate and Mill year 2021, such as:</p> <p>Tungkal Ulu Mill</p> <ul style="list-style-type: none"> - Housing B/CM (2 units) - Housing C (5 units) - Housing E (61 units) - Water pump (1 unit) - Water reservoir (2 units) <p>Tungkal Ulu Estate</p> <ul style="list-style-type: none"> - Housing; staff (20 units), type D1(28 units), type E1 (187 units). - Kindergarten (1 unit). - Clinic (2 units). - Mosque (3 units). - Church (1 unit). - School bus (4 units). - Ambulance (1 unit). - <i>Koperasi</i> (1 unit). 	<p>Complied</p>
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		<ul style="list-style-type: none"> - Employee hall (1 unit). - Sport facilities (football, volleyball, tennis, badminton). 	
6.2.5	The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.	<p>Company is able to demonstrate effort in providing access to adequate, sufficient and affordable food: provision of rice allowance – aside from monthly salary to all eligible workers, cooperative organization for employee providing basic food necessities (<i>Waserda Koperasi Jaya Abadi</i>).</p> <p>Smallholder</p> <p>The farmer members are a developed transmigration village. Provision of food can be obtained from existing markets in the village. Based on the results of field visits to the sample villages indicate that in the village was available markets and small shops that provide basic necessities.</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>Determination of wage for period 2021 is based on Decree of Governor of Jambi SK No. 883/KEP.GUB/DISNAKERTRANS-3.3/2020 dated 2 November 2020 regarding "<i>Penetapan Upah Minimum Propinsi Jambi Tahun 2021</i>" amount of IDR 2,630,162.13. The Department of HRD (Manager HRD RO3) has issued Memorandum 002/HR-RO3/MEMO/02/2021 on 1 March 2021 related wages for year 2021 is 2,769,040.5 per month (25 Working Days) or equal to IDR 110,761.62 per day. The wages that have been set by company is higher than the UMP of Jambi Province 2021.</p> <p>The wages that have been set by company is higher than the UMP of Jambi Province 2021. The company has also given rice allowance for the workers, which is 15 kg/month for each worker, 9 kg/month for wife of workers and 7.5 kg/month for child of workers (maximum 3 children). The price of rice in August 2021 is IDR 9,500/kg.</p>	Complied

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		<p>The company also made calculations related to DLW, based on the wages given to employees as costs given by the company. Following is DLW Calculation of Tungkal Ulu Group.</p> <table border="1"> <thead> <tr> <th data-bbox="1133 507 1211 560">No.</th> <th data-bbox="1211 507 1758 560">In Kind Benefits</th> <th data-bbox="1758 507 1973 560">Total (IDR)</th> </tr> </thead> <tbody> <tr> <td data-bbox="1133 560 1211 707">1.</td> <td data-bbox="1211 560 1758 707">Housing (Cost of Building: 30 years) + (Annual Maintenance: Number of Houses) ÷ 12 Months</td> <td data-bbox="1758 560 1973 707">257,575</td> </tr> <tr> <td data-bbox="1133 707 1211 820">2.</td> <td data-bbox="1211 707 1758 820">Electricity & Water (Annual cost of water & electricity ÷ Number of houses) ÷ 12 Months</td> <td data-bbox="1758 707 1973 820">73,573</td> </tr> <tr> <td data-bbox="1133 820 1211 1000">3.</td> <td data-bbox="1211 820 1758 1000">Education [(Total cost not including teacher and non teacher labor cost + school transport + school building maintenance + food for children) ÷ number of workers] ÷ 12 months</td> <td data-bbox="1758 820 1973 1000">25,534</td> </tr> <tr> <td data-bbox="1133 1000 1211 1147">4.</td> <td data-bbox="1211 1000 1758 1147">Creche Facilities (TPA) (Building maintenance + Food for children + supplies + caretaker cost) ÷ Number of workers</td> <td data-bbox="1758 1000 1973 1147">8,752</td> </tr> <tr> <td data-bbox="1133 1147 1211 1294">5.</td> <td data-bbox="1211 1147 1758 1294">Healthcare (Kesehatan) (Maintenance of clinic, medicine & medical materials, ambulance transport cost + cost of healthcare workers) ÷ Number of workers</td> <td data-bbox="1758 1147 1973 1294">772</td> </tr> <tr> <td data-bbox="1133 1294 1211 1347">6.</td> <td data-bbox="1211 1294 1758 1347">Food</td> <td data-bbox="1758 1294 1973 1347">152,375</td> </tr> <tr> <td data-bbox="1133 1347 1211 1391">7.</td> <td data-bbox="1211 1347 1758 1391">Sport & Recreation Facilities</td> <td data-bbox="1758 1347 1973 1391">3,172</td> </tr> </tbody> </table>	No.	In Kind Benefits	Total (IDR)	1.	Housing (Cost of Building: 30 years) + (Annual Maintenance: Number of Houses) ÷ 12 Months	257,575	2.	Electricity & Water (Annual cost of water & electricity ÷ Number of houses) ÷ 12 Months	73,573	3.	Education [(Total cost not including teacher and non teacher labor cost + school transport + school building maintenance + food for children) ÷ number of workers] ÷ 12 months	25,534	4.	Creche Facilities (TPA) (Building maintenance + Food for children + supplies + caretaker cost) ÷ Number of workers	8,752	5.	Healthcare (Kesehatan) (Maintenance of clinic, medicine & medical materials, ambulance transport cost + cost of healthcare workers) ÷ Number of workers	772	6.	Food	152,375	7.	Sport & Recreation Facilities	3,172	
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			Total Cost of In Kind Benefits	521,754	
			Average Monthly Take Home Salary per Worker	2,356,654	
			Total Value of Prevailing Wage	2,878,408	

PROCEDURAL NOTE:
 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.
 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:

1. Payment of minimum wages in accordance with applicable regulations
2. Assessment of wages paid (prevailing wages) and in-kind benefits.

Once the DLW benchmark is available, this procedural note is no longer applicable.

6.2.7	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>Based on document review and interview with management, it was known that PT IIS Tungkal Ulu still has casual workers (PHL) for the main types of work such as harvesting and production. PT IIS-Tungkal Ulu in the present period has replanting work which is mostly done by daily workers (PHL).</p> <p>For the main types of work that are still being carried out by PHL, PT IIS Tungkal Ulu has set a plan regarding the PHL Promotion Program which has been approved by HRD RO3 - Jambi, the program has been set until 2024.</p> <p>The following is the realization of promotion to permanent workers, for 2020 at estate there are 5 workers as harvester, for 2021 at estate there are 7 workers as harvester and 5 workers as FFB loading workers and at Mill there are 3 workers.</p>	Complied
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		<p>The following are the sample of promotion workers to permanent workers (SKU):</p> <p>Estate:</p> <ol style="list-style-type: none"> 1. Memorandum of RH Plantation 3 - Jambi No. 017/HR-RO3/MEMO/SK/03/2021 dated 22 March 2021 on behalf Rahmat Tulla Nasution as harvester (SKU). 2. Memorandum of RH Plantation 3 - Jambi No. 0156/HR-RO3/MEMO/SK/06/2021 dated 28 June 2021 on behalf Misnan as harvester (SKU). 3. Memorandum of RH Plantation 3 - Jambi No. 0157/HR-RO3/MEMO/SK/06/2021 dated 28 June 2021 on behalf Cucu as harvester (SKU). 4. Memorandum of RH Plantation 3 - Jambi No. 0158/HR-RO3/MEMO/SK/03/2021 dated 28 June 2021 on behalf Surya Darma Sinaga as harvester (SKU). 5. Memorandum of RH Plantation 3 - Jambi No. 0160/HR-RO3/MEMO/SK/06/2021 dated 28 June 2021 on behalf Abdul Haini as harvester (SKU). 6. Memorandum of RH Plantation 3 - Jambi No. 0162/HR-RO3/MEMO/SK/06/2021 dated 28 June 2021 on behalf Sukiman as FFB loading worker (SKU). 7. Memorandum of RH Plantation 3 - Jambi No. 0163/HR-RO3/MEMO/SK/06/2021 dated 28 June 2021 on behalf Hasim Damanik as FFB loading worker (SKU). 8. Memorandum of RH Plantation 3 - Jambi No. 0164/HR-RO3/MEMO/SK/06/2021 dated 28 June 2021 on behalf Andika Ananda as FFB loading worker (SKU). <p>Mill:</p>	
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		<ol style="list-style-type: none"> 1. Memorandum of RH Plantation 3 - Jambi No. 0178/HR-RO3/MEMO/SK/08/2021 dated 23 August 2021 on behalf M Riduan Sapii as Loading Ramp Operator (SKU). 2. Memorandum of RH Plantation 3 - Jambi No. 0177/HR-RO3/MEMO/SK/08/2021 dated 23 August 2021 on behalf Ridwan Yuna as Production Clerk (SKU). 3. Memorandum of RH Plantation 3 - Jambi No. 0179/HR-RO3/MEMO/SK/08/2021 dated 23 August 2021 on behalf Rahmad Daniel as mechanic (SKU). 	
<p>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>			
<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>Freedom of association policy is written in Bahasa Indonesia, as stated in "Kebijakan Perusahaan", dated 1st December 2014 "<i>Menghormati hak setiap karyawan untuk membentuk atau menjadi serikat pekerja sesuai dengan keinginannya dan untuk melakukan tawar menawar secara kolektif</i>".</p> <p>This policy has been informed to all employees and being placed into public area easily accessed.</p> <p>Tungkal Ulu Estate and POM have a Worker Union as a form of freedom of association for employees named Serikat Buruh Sejahtera Indonesia (SBSI), base on decree of Koordinator Wilayah Provinsi Jambi Serikat Buruh Sejahtera Indonesia, no. K6.95/SK/ KORWIL.SBSI/JAMBI/II/2017 dated 10 January 2017 concerning Pengurus Komisariat Serikat Buruh Sejahtera Indonesia PT IIS Tungkal Ulu Kab. Tanjung Jabung Barat decided Mr. S. Sitorus as chairperson of SBSI period 2017-2019 with total number of registered members as many as 204 people.</p>	<p>Complied</p>

		<p><u>Smallholders:</u> There is no labour union that formed by smallholders (N/A)</p>	
<p>6.3.2</p>	<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>Mill, Estate and Smallholder: Record of meeting of SBSI/(Labor Union), such as: 1) January 27, 2021, discussion regarding the making of the SBSI work program in 2021, attended by 23 participants. 2) March 10, 2021, discussion regarding Making SBSI work program in 2021, attended by 20 participants 2) April 19, 2021, discussion related: <ul style="list-style-type: none"> • PLN (electricity) subsidies provided by the company to employees of Rp. 40,000 per month are not sufficient for a month. The company will re-coordinate with leaders (Regional Head-Jambi) • Delay of procurement-PP shoes for traction workshop employees. There was missed communication: the previous warehouse officer (krani) with the new one that the PP safety shoes have been carried out with no. PP KTU1800168 in May 2021 • It is necessary to arrange a vehicle for garbage collection in the employee housing area, a vehicle has been arranged to transport waste in the residential environment, namely DT.09 and DT.13 SBSI Tungkal Ulu has set work program on 2021, such as: <ul style="list-style-type: none"> - One month meeting which is an internal board meeting. - Holding a Bipartite meeting between unions (SBSI) and company leaders 2 times a year. - Hold monthly SBSI member meetings </p>	<p>Complied</p>

		<ul style="list-style-type: none"> - Conducting counseling and dissemination to all members of SBSI regarding District Minimum Wage in 2018 <p>SPSI has also established a work program that is recorded in the Work Program PUK SPSI PT Inti Indosawit Subur Group Kebun Tungkal Ulu Year 2021.</p>	
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>Based on interview with chairman of labour union obtained information that there is no interfere with the formation or operation of registered labour organizations/unions, or other freely elected representatives for all workers.</p> <p>Based on the labour union statutes, the right to become a member of a labour union is a permanent employee. Each member has voting rights (right to be elected and to vote).</p> <p><u>Smallholders:</u> There is no labour union that formed by smallholders (N/A)</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>A formal policy for the protection of children, including prohibition of child labour and remediation under "Kebijakan Perusahaan", was signed by Managing Director on 1st December 2019, in point 14 mentioned: It is not allowed all children to work in every activity in company".</p> <p>The company's policy is also published to use posters at any strategic places in the plantations (Tungkal Ulu Estate and Tungkal Ulu Mill).</p> <p>All contracts, including those for the supply of FFB, contain specific clauses regarding compliance with applicable legal requirements including those concerning child labor / prohibitions on the employment</p>	Complied

		<p>of children under 18 years, and this can be proven by third parties. Taken sample:</p> <ul style="list-style-type: none"> • FFB Supplier Agreement dated 22 October 2019. on behalf of Merlung Topaz, found at no. 12 regarding child protection: "Do not employ child labor (18 years) • Contract Work Agreement No. 151/E3KMB/04/19 dated 18 April 2019 collaborations between PT Inti Indosawit Subur and Mr. Mahyudin Abdul Rahman for the type of construction work 1 unit of workshop at Tungkal Ulu Estate. • Work Agreement Rent Heavy Equipment No. 016/E3KMB/01/20 dated January 2, 2020, collaboration between PT IIS and PT Uniteda Arkato for the type of rental service for 1 unit of heavy equipment (Backhoe Loader (Type: JCB 3 CX). <p><u>Smallholder:</u> Plasma Tungkal Ulu have established policies related to the prohibition of employing children (under 18 years old). Samples taken for the KUD Sawit Kita, Karya Kita, Karya Jaya, Panca Mukti, Sari Bumi and KUD Sawit Mulia Policy, explained in point 10; It is forbidden to employ children under the age of 18 in every plantation operational activity".</p> <p>This policy was disseminated to all members on 13 March 2021.</p> <p>Based on document review (list of employees) of KUD Sawit Kita, Karya Kita, Karya Jaya, Panca Mukti, Sari Bumi and KUD Sawit Mulia there were found that a minimum age met (the youngest of harvester born year 1996 – based on ID verification)</p>	
6.4.2	(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.	PT Inti Indosawit Subur – Tungkal Ulu has established Company Policy under "Kebijakan Perusahaan", was signed by Managing Director on 1st	Complied

		<p>December 2014, in point 14 mentioned: It is not allowed all children to work in every activity in company”.</p> <p>The company's policy is also published to use posters at any strategic places in the plantations (Tungkal Ulu Estate and Tungkal Ulu Mill).</p> <p>All contracts, including those for the supply of FFB, contain specific clauses regarding Comply with applicable legal requirements including those concerning child labour / prohibitions on the employment of children under 18 years, and this can be proven by third parties.</p> <p>All contracts, including those for the supply of FFB, contain specific clauses regarding compliance with applicable legal requirements including those concerning child labor / prohibitions on the employment of children under 18 years, and this can be proven by third parties. Taken sample:</p> <ul style="list-style-type: none"> • FFB Supplier Agreement dated 22 October 2019. on behalf of Merlung Topaz, found at no. 12 regarding child protection: “Do not employ child labor (18 years) • Contract Work Agreement No. 151/E3KMB/04/19 dated 18 April 2019 collaborations between PT Inti Indosawit Subur and Mr. Mahyudin Abdul Rahman for the type of construction work 1 unit of workshop at Tungkal Ulu Estate. • Work Agreement Rent Heavy Equipment No. 016/E3KMB/01/20 dated January 2, 2020, collaboration between PT IIS and PT Uniteda Arkato for the type of rental service for 1 unit of heavy equipment (Backhoe Loader (Type: JCB 3 CX). <p>Based on the agreement document (Cooperation Agreement contract), that in Article 7. About responsibilities and obligations, described in</p>	
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		<p>relation to legal requirements and documentation, employees (including not to employ minors), human rights and business-ethics.</p> <p>In some work orders documents (dokumen SPK) is also explained in relation to legal requirements, employment (including wage) and Comply with legislation and the obligation to respect human rights and business ethics in article 1 No. 6-9; article 12 related to protection to children or prohibition to employ under 18 years to and no. 13 related to business ethics.</p> <p><u>Smallholder:</u> Plasma Tungkal Ulu have established policies related to the prohibition of employing children (under 18 years old). Samples taken for the KUD Sawit Kita, Karya Kita, Karya Jaya, Panca Mukti, Sari Bumi and KUD Sawit Mulia Policy, explained in point 10; It is forbidden to employ children under the age of 18 in every plantation operational activity”.</p> <p>This policy was disseminated to all members on 13 March 2021.</p> <p>Based on document review (list of employees) of KUD Sawit Kita, Karya Kita, Karya Jaya, Panca Mukti, Sari Bumi and KUD Sawit Mulia there were found that a minimum age met (the youngest of harvester born year 1996 – based on ID verification)</p>	
6.4.3	(C) Young person maybe employed only for non-hazardous work with protective restrictions in place for that work.	Based on interview with chairman of labour union obtained information that the minimum age of workers has been socialized to the respective workers in all level. According to the list of workers period June 2021, there is no underage employee found.	Complied

		Based on interview with worker and document verification, there is no indication on forced labour and/or trafficked labour.	
6.4.4	The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.	PT Inti Indosawit Subur – Tungkal Ulu established the Policy, was signed by Managing Director dated 1 st December 2014, that stated: "It is not allowed all children to work in every activities/process in company". Based on document review of list of workers, interview with workers and observation during field visit, it was no found workers hired less than 18 years.	Complied
Criteria 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	(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.	A policy to protect the reproductive rights as it is found in company policy that's signed by Managing Director, dated 01st December 2014 and on one part of the policies stated that: " <i>Mencegah pelecehan seksual dan berbagai bentuk kekerasan terhadap perempuan serta melindungi hak-hak reproduksinya</i> "- (To prevent any sexual or physical abuses happen to women as well as to protect their reproductive rights)". The company's policy is also published to use posters at any strategic places in the plantations (Tungkal Ulu Estate and Tungkal Ulu Mill). There is a gender committee actively meets and discussing general agenda and other issue related to handling sexual harassment, dissemination of sexual harassment prevention. Gender committee has dissemination on 12 February 2021 attended by 8 representatives of women workers from each affair (a list of attendance can be shown at the time of the audit). Based on the records	Complied

		<p>of the routine meeting and interviews with management, that during the period 2019-2020 there were no cases related to women workers.</p> <p><u>Smallholder:</u> Most of the farmers are managed their land independently. Therefore, the policy does not directly applicable to them. Organization has policy to prevent sexual harassment and violence against women in "Kebijakan ICS Group Manager" which stated "<i>Mencegah pelecehan seksual dan berbagai bentuk kekerasan terhadap perempuan serta melindungi hak reproduksinya</i>" - (prevent sexual harassment and violence as well as protect reproductive rights for women).</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>A gender committee was available 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 – Tungkal Ulu has established the company policy dated 1st December 2014 related to A policy to protect the reproductive rights of all, especially of women. The policy stated that "To prevent any sexual or physical abuses happen to women as well as to protect their reproductive rights".</p> <p>There is a gender committee actively meets and discussing general agenda and other issue related to handling sexual harassment, dissemination of sexual harassment prevention.</p> <p>Based on interview with Gender Committee, company has implemented the protection of women reproductive rights, in form of maternal leave,</p>	Complied

		<p>period leave, and regular pregnancy check for female sprayers and strictly prohibit pregnant and/or breastfeeding female worker applying pesticides. The latest pregnancy test in July 2021</p> <p><u>Smallholder:</u> Most of the farmers are managed their land independently. Therefore, the policy does not directly applicable to them. Organization has policy to prevent sexual harassment and violence against women in "Kebijakan ICS Group Manager" which stated "<i>Mencegah pelecehan sexual 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>	
6.5.3	<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>The company has identified female workers as new mother and made assessment their need base on consultation with them. Record showed during audit are:</p> <ul style="list-style-type: none"> • List of new mother PT IIS Tungkal Ulu. • Example of questionnaire for new mother. <p>Based on field visit at worker housing facilities found that the company already has a good childcare facility "<i>Tempat Penitipan Anak</i>" which has breast feeding room. Interview result with the childcare worker and gender committee revealed that the new mother (female worker) could easily access the childcare "<i>Tempat Penitipan Anak</i>".</p>	Complied
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>PT Inti Indosawit Subur – Tungkal Ulu has prepared procedure on a specific grievance mechanism which respects anonymity of complainants under Standard Operating Procedure, No. SOP: HR-308.5-RO; Revision:0, 11/12/2009: Employees complaints: Submission and settlement.</p>	Complied

		<p>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: "to provide appropriate information for those who inquiry it and to protect its confidentiality for whistleblower 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.</p> <p>Record of complaint/specific grievance has demonstrated under "<i>Buku Keluhan Karyawan</i>". For 2020 there are 4 complaints and for 2021 until September there are 10 complaints. The company has resolved all complains according to the procedure. Verified document for example:</p> <ul style="list-style-type: none"> • Complaint on 2 January 2021 from employee namely Siswanto (harvester), related damage to the roof of the house, this complaint has followed up on 10 January 2021. • Complaint on 4 January 2021 from employee namely Subki (harvester), related damage to the water closet, this complaint has followed up on 12 January 2021. • Complaint on 24 February 2021 from employee namely Ismanto (mandor), related damage to the septic tank, floor and roof of the house, this complaint has followed up on 27 February 2021. <p>Scheme Smallholders:</p> <p>The scheme smallholders have mechanism of consultation and communication in "<i>Mekanisme komunikasi, konsultasi dan keluhan Kebun Plasma Tungkal Ulu Group</i>", April 2021.</p> <p>Based on logbook of record in the form of "<i>Penerimaan Keluhan dan Tanggapan</i>" for year 2020 and 2021 period, there was no grievance reported.</p>	
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Criteria 6.6: No forms of forced or trafficked labour are used.

6.6.1	<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>Based on document verification and interviews with management at the time of the audit, PT IIS had implemented the employee recruitment process in accordance with established procedures and complied with applicable laws and regulations (Law No. 13 of 2003). Based on the PKWT and BHL Contract of Work Agreement documents, the company has explicitly determined voluntary work and at the time of recruitment of employees this agreement document was falsified directly to prospective employees, then this agreement document was made in duplicate (1 copy was given to the employee concerned). PT IIS also does not withhold employee identity documents, withhold wages, coercion for overtime and also impose penalties on employees if the employee quits.</p> <p>According to documents review and interview with the workers, gender committee, worker union, revealed that there is no 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, penalty (unless the unit of certification and the workers are agree and it is stated in the employment agreement), debt bondage and withholding of wages.</p>	Complied
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>Remote audit:</p> <p>Certificate holder uses peace workers and specified time work agreement workers in plantation and mill operations. Based on the May 2020 list of employees there were 505 workers in the plantation, 29 workers in the Tungkal Ulu factory and 8 workers in the Tungkal Ulu Plasma.</p> <p>The company has a procedure regarding the Acceptance of New</p>	Non-compliance

		<p>Employees SOP No. AA-HR-305.2-R0 dated February 1, 2009 this procedure is a general acceptance of employees (for all employees), but there are no specific procedures and policies regarding peace workers and specified time work agreement workers according to the RSPO P&C requirements.</p> <p>The certificate holder has not been able to show the company's procedures and policies related to temporary workers / PHL (Specific Time Work Agreement / PKWT). This is raised as noncompliance.</p> <p>Onsite Audit: Company has had a SOP related to new employment recruitment. According to SOP: AA-HR-305.2-R0 dated 1 February 2009 regarding "<i>Penerimaan Karyawan Baru</i>" (Recruitment and Selection of Employee), the company will accept new employee based on their capabilities and qualifications. This policy has been communicated to worker. This procedure were communicated to all employees in the workplace and stakeholders as well on November 2019.</p> <p>There are three types of employees that are applied in PT IIS, which are permanent employees (known as SKU-B and SKU-H) and daily workers (known as BHL/PHL) and contract workers (PKWT). Worker register for mill and estates mentioned that all workers came from different backgrounds (race, religion, gender, etc.). Ethnical diversity of worker and during interview with workers, no discrimination was identified based on religion, ethnic, gender. No evidence of discrimination found during the audit and migrant workers as well. Permanent Employee (SKU-H and SKU-B) is confirmed under the Collective Labor Agreement</p>	
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		<p>(PKB), while the daily worker with the daily work agreement with a minimum validity period of 1 year.</p> <p>During the onsite visit and document verification obtained information that the corrective action plan has running well, monitored and evaluated regularly.</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 – Tungkal Ulu has prepared the Standard Operating Procedure on personal protective equipment No. AA-SOP-OP-101.3-R0 dated 14/08/2013.</p> <p>PT Inti Indosawit Subur – Tungkal Ulu POM has also restructurized the OHS committee since 2019, OHS committee has been registered under P2K3 (Panitia Pembina Keselamatan dan Kesehatan Kerja) as per “Keputusan Kepala Dinas Tenaga Kerja Kabupaten Tanjung Barat Nomor 560/846/3.3/P2K3/NAKER/2019 tentang Pengesahan Perubahan Panitia Pembina Keselamatan dan Kesehatan Kerja (P2K3) PT Inti Indosawit Subur Kebun Tungkal Ulu”, dated 16th May 2019. OHS committee headed by Mill Manager Tatar Simanjuntak and secretary of P2K3 is Salman Alfarisi as OHS expert with member of P2K3 20 personel.</p> <p>Safety meeting conducted in monthly basis. Based on Safety Committee Report, last 15 June 2021.record seen: Minutes of meeting agenda: review and analysis accident record/report, review disease report of clinic, review near miss report.</p> <p>Report of P2K3 meeting and OHS performance has reported to Manpower Agency in Tanjung Jabung Barat Regency each quarter</p>	<p>Complied</p>

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		<p>(three-monthly), sample seen report P2K3 Tungkal Ulu POM period April - June 2021. Evidence of report receipt can be demonstrated during audit as per "Daftar Distribusi Eksternal".</p> <p><u>Smallholder:</u></p> <p>Scheme smallholder has appointment the "Asisten Plasma" as person in charge for cooperative's health and safety aspects</p> <p>Safety Meeting in KUD has been conducted regularly. Meeting agenda consisting of training on PPE usage (Helmet, Goggles and Shoes and also chisel equipped with Cover). Record of regular meeting management plasma can be demonstrated.</p>	
6.7.2	<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 – Tungkal Ulu POM has developed the mechanism on handling an accident investigation under procedure no: SOP AA-OP-SMK3-07-FM Accident Investigation SOP, August 3, 2017. In the accident investigation form include: the accident data, details of injuries/sections exposure, photographs/sketches, evidence of investigation (witnesses, positions, equipment, documents), sequence of events (pre-contact, contact, post-contact), type of incident, cause of accident (unsafe, unsafe) accidents (personal and work factors), corrective and preventive actions, investigative team. During audit verification, found that the accident form was complete and adequate.</p> <p>Procedure for first aid and emergency situation available under "Kesiagaan dan Tanggap Darurat" document, number AA-EMS-447-PR, dated December 2010. The emergency situation identified such as land and forest fire, fire at housing and mill, hazardous waste spillage, boiler explosion, gas tank explosion, earthquake, flood, landslide, etc. A team</p>	Complied

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		<p>for emergency response has been established, headed by Mill Manager and Estate Manager Records of accidents maintained properly by safety officers and reported regularly to local authorities.</p> <p>Evident taken:</p> <ul style="list-style-type: none"> • The company has appointed a workers who have attended First Aids training. • Training related to first aider was conducted on 8 July 2018, location in Tungkal Ulu POM Estate • Based on field visit to spraying team, warehouse area and workshop in Tungkal Ulu Estate has completed with first aid kit. Inside first aid kit company has completed with "Daftar Obat" which contain list of medicine and first aid kit equipment. The PIC also has shown the "Daftar Pemakaian Obat P3K – Medicine Usage List" as well in order to record the usage of first aid kit medicine and equipment. During audit and field visit shown that all the first aid kit found completed and well maintain <p>PT Inti Indosawit Subur – Tungkal Ulu has appointed a worker who have attended the First Aid training. Data verified: License for First Aider no register L.P001/560/4.3/DTKT/2018, namely Mrs Evianty Sembiring, A.Md.Keb, valid until 2nd January 2020; First Aider licence on behalf Elvita Rossi register number L.P.008/560/5.3/DSTK/2017, June 2017 valid until June 2019. List of first aid kit (include portable first aid) as in "Checklist inspeksi P3K" location in Estate office, chemical warehouse, field foreman (24 pcs of portable first aid) while in Tungkal Ulu POM there were 9 first aid kit located in Fuel storage/Ware house, Workshop, Office, Warehouse central, Grading station, Laboratoy, weighbridge office and parking area.</p> <p>Smallholder:</p>	
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		<p>The cooperative has prepared the procedure for emergency under document "Rencana Tindakan Tanggap Darurat" dated 2nd January 2021, consist of fire, earthquake, flood, and landslide.</p> <p>The cooperative has prepared the procedure for emergency under document "Bukti Telah Memahami dan Melaksanakan Tindakan Darurat", consist of fire, earthquake, flood, landslide.</p> <p>The procedure for work incident has demonstrated as in document "Mekanisme Pertolongan Pertama Pada Kecelakaan", document verified in KUD Sawit Kita, Karya Kita, Karya Jaya, Panca Mukti, Sari Bumi and KUD Sawit Mulia has reviewed the procedure in January 2021.</p> <p>KUD/Cooperative also has established the emergency call center and important call for emergency response.</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 – Tungkal Ulu has demonstrated the record of realization the OHS program 2021 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"> – Monitoring of emergency response and preparedness facilities, i.e: fire hydrant and fire extinguisher, updated in March 2021, location in POM. – Refreshment of socialization the company's policies, conducted in 6th January 2021 – location Estate was attended by 34 workers – Report of OHS inspection report, location in I POM dated 14^d January 2021 – reported OK for PPE usage, and OHS facilities (fire hydrant) – Record of handover of PPE, location in estate dated 18th April 2021; PPE: helmet, safety glasses. 	Non-compliance

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		<p>– “Checklist on monitoring of PPE use for harvester in Tungkal Ulul Estate dated 17th January 2021. Reported Ok for safety helmet, AP boot, safety glasses, chisel cover.</p> <p>Noncompliance statement: PT Inti Indosawit Subur – Tungkal Ulu POM has prepared the procedure of PPE - “SOP Alat Pelindung Diri’ No: AA-SOP-OP- 101.3. The procedure stated that the company has provided adequate and appropriate protective equipment for all workers at place of works, in line with the risk assessment.</p> <p>During field visit in Tungkal Ulu POM, the auditor team found:</p> <ul style="list-style-type: none"> • In boiler station area - found 2 welders working at height, but workers not wearing safety harness or body harness. • In sortation station - found 2 drivers for FFB transport was not used shoes (they use sandals). <p>Based on field visit sampled, the organization has not been able to demonstrate the consistency of PPE to cover all potentially hazardous operations. This is raised as noncompliance.</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 – Tungkal Ulu has been provided insurance to all workers including non-permanent worker. Insurance covered by BPJS, as mandated by government regulation. Medical checkup provided for all workers (not only for high-risk worker).</p> <p>PT Inti Indosawit Subur – Tungkal Ulu has also been provided clinic for all workers. Referral are made to nearest hospital should the case is severe/critical. Medical check-up has been conducted for all workers all in Muara Bulian The medical check-up including blood test, physical</p>	Complied

		<p>examination, audiometric test and spirometric test. Result of examination for worker is kept. Company also providing social and accident insurance in from BPJS Ketenagakerjaan – for all workers.</p> <p>Document verification:</p> <ul style="list-style-type: none"> • Transfer form to BPJS Ketenagakerjaan, month May 2021 • Rekapitulasi Rincian Pembayaran Iuran both BPJS Kesehatan dan Ketenagakerjaan month May 2021 • Transfer record/form via Mandiri Bank for period June 2021, validation number 11011100154, dated 10 June 2021, <p><u>Scheme Smallholders</u></p> <p>No workers being employ permanently by the smallholders. Provision of insurance in case of accident, through donation from smallholders and “Kelompok Tani”.</p>																											
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	<p>PT Inti Indosawit Subur – Tungkal Ulu POM has shown the record of “Indeks K3 Pabrik/Kebun Tungkal Ulu January – August 2021. Reported in Tungkal Ulu POM & Estate:</p> <table border="1" data-bbox="1131 946 1960 1391"> <thead> <tr> <th rowspan="2">Category</th> <th colspan="2">Case Number</th> </tr> <tr> <th>Tungkal Ulu POM</th> <th>Tungkal Ulu Estate</th> </tr> </thead> <tbody> <tr> <td>Fatality</td> <td>Nil</td> <td>Nil</td> </tr> <tr> <td>Permanent disable</td> <td>Nil</td> <td>Nil</td> </tr> <tr> <td>Fire</td> <td>Nil</td> <td>Nil</td> </tr> <tr> <td>Property damage</td> <td>Nil</td> <td>Nil</td> </tr> <tr> <td>Medical aid</td> <td>1</td> <td>14</td> </tr> <tr> <td>First aid</td> <td>Nil</td> <td>Nil</td> </tr> <tr> <td>Near miss report</td> <td>Nil</td> <td>Nil</td> </tr> </tbody> </table>	Category	Case Number		Tungkal Ulu POM	Tungkal Ulu Estate	Fatality	Nil	Nil	Permanent disable	Nil	Nil	Fire	Nil	Nil	Property damage	Nil	Nil	Medical aid	1	14	First aid	Nil	Nil	Near miss report	Nil	Nil	Complied
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		<p><u>Smallholder:</u></p> <p>The procedure for work incident has demonstrated as in document "Mekanisme Pertolongan Pertama Pada Kecelakaan", document verified in KUD Sawit Kita, Karya Kita, Karya Jaya, Panca Mukti, Sari Bumi and KUD Sawit Mulia has reviewed the procedure in January 2021.</p> <p>KUD/cooperatives record the work incident in "Rekaman kejadian Kecelakaan Kerja Tahun 2021". Record of incident were also available in Puskesmas (Village clinic).</p> <p>According to record of accident there is no accident reported since January – June 2021 in KUD Sawit Kita, Karya Kita, Karya Jaya, Panca Mukti, Sari Bumi and KUD Sawit Mulia</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</p> <p>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.</p> <p>According to the interview with pest control officer in Tungkal Ulu 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. 	<p>Complied</p>

		<ul style="list-style-type: none"> • Census of Barn Owl Box occupation in three monthly bases. <p>The last census in Tungkal Ulu Estate has been conducted in second week of November 2020. Result of census shows that pest attack still under control (below the economic threshold) which is limit 5%.</p> <p>Scheme Smallholder:</p> <p>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>Onsite Audit:</p> <p>The last census in Tungkal Ulu Estate has been conducted in second week of August 2021. Result of census shows that pest attack still under control (below the economic threshold) which is limit 5%.</p> <p>During the field visit in own estate (Tungkal Ulu Estate block D18a Afdeling 4) 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.</p> <p>Scheme Smallholder:</p>	
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		According to document verification and field visit to the smallholders plot in 3 KUD's, 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.	
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 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.	<p>Onsite Audit:</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>During the audit, found some pesticide list that usually used with active ingredients such as <i>isopropyl amine glyphosate, fluoroksifir, methyl</i></p>	Complied

		<p><i>metsulfuron, triklofir, diuron, diuron, lamda sihalotrin and 2,4-D dimetil amina, bacillus thuringiensis berliner, ammonium glufosinat, acephate, copper oxide and mancozeb.</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>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.</p> <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 2020 – February August 2021, the smallholders used pesticide with active ingredients isopropyl amine glyphosate, fluoroksifir and methyl metsulfuron. There is no record of paraquat diklorida usage.</p>	
7.2.2	(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.	Certificate holder has showed the record of LD50 calculation in each unit based on amount of pesticide used. For example, Kebun Luar Tungkal Ulu 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 – August 2021 known that LD50 of isopropyl amina glifosat was 0.2841 mg/Ha.	Complied
7.2.3	(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.	Until this recertification audit obtain information that there is no pesticide use for control pest attack. All of pesticide only using for weeding (herbicide).	Complied

		Based on interview with IPM supervisor and smallholder representatives known that no outbreak that causes pesticide usage.	
7.2.4	There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in Indonesia best practice guidelines.	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.	Complied
7.2.5	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. The due diligence refers to: 7.2.5a Judgment of the threat and verify why this is a major threat.	Based on goods in and goods out data in pesticide store, obtained information that the certificate holder used some kind of pesticide (different active ingredients). There is only <i>paraquat diklorida</i> that listed as WHO Class II (Moderately Hazardous). As described in this indicator, the company no longer using <i>paraquat diklorida</i> since November 2019. There is no use of other pesticide class 1A and 1B until the audit.	Complied
	7.2.5b Why there is no other alternative which can be used.	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. 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 procedures 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>	<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>	
	<p>7.2.5d Process to limit the negative impacts of the application.</p>	<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. • 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. It rotation can be reduced in line with the palm ages.</p>	

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7.2.6	<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>Certificate holder has assign 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 obtained information that the company has conducted pesticide handling training on 25 November 2020. 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>Onsite Audit: 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>	Complied
7.2.7	<p>(C) Storage of all pesticides in accordance with recognized best practices.</p>	<p>SOP for pesticide storage has been provided in SOP "Pengangkutan dan Penyimpanan Bahan Kimia AA-KL-02-EFP" dated 1 February 2008. Pesticides are stored in the determined area separated from fertilizer and other chemicals.</p>	Complied

		<p>Pesticide storage is provided in Divisions as well as in central storage. Agrochemical storage is locked areas with limited access. The storage is ventilated. MSDS and hazard symbol label are provided nearby of pesticides. Emergency shower and eyewash are also provided to anticipate in case of an emergency of agrochemical handling. PPE for handling of pesticides provided including boots, apron, safety glass, respiratory mask and hand gloves.</p> <p>The possible spillage is managed. Secondary containment is provided around the pesticide storage area. Spill kit is also provided in the area.</p> <p>Storage of pesticides found to be in accordance with hazard identification and risk assessment and national guideline for limited pesticide use. Empty chemical containers had been used for mixing chemicals for spraying pesticides in the field. The management of waste material from empty pesticide container disposed through hazardous waste store as per procedure "Penanganan Limbah Industri B-3 AA-KL-06-EFP" dated 1 November 2008.</p> <p>The company has temporary hazardous waste storage where all hazardous waste from all estates and mills collected.</p> <p>Smallholder: Most of farmer members of Tungkal Ulu Smallholder were not directly conducted pesticide application and handling. Spraying works (pesticide application) in smallholder area were performed mostly by spraying team called TUS from PT Inti Indosawit Subur – Tungkal Ulu Estate. Some training records are kept by PT Inti Indosawit Subur - Tungkal Ulu Smallholder management ensured that all agrochemical usage and waste handling was performed by PT Inti Indosawit Subur.</p>	
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<p>7.2.8</p>	<p>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>	<p>SOP for proper disposal of pesticide waste material was described in "Penanganan Limbah Industri B-3 AA-KL-06-EFP" dated 1 November 2008. Pesticide waste was reuse as mixing water for the next spraying activity. All empty pesticides containers were triple rinsed and stored in the temporary storage of hazardous wastes.</p> <p>The management of waste material from empty pesticide container disposed through hazardous waste store according to the procedure. The company has licensed temporary hazardous waste storage where all empty pesticide containers from agrochemical storage collected.</p> <p>Personnel interviewed can clearly explain the mechanism of pesticide waste handling including MSDS and personal protective equipment as well as first aid.</p> <p><u>Smallholder:</u></p> <p>Most farmer members of Tungkal Ulu Smallholder were not directly conducted pesticide application and handling. Spraying works (pesticide application) in smallholder area were performed mostly by spraying team called TUS from PT Inti Indosawit Subur – Tungkal Ulu. Some training records are kept by PT Inti Indosawit Subur. Tungkal Ulu Smallholder management ensured that all agrochemical usage and waste handling was performed by PT Inti Indosawit Subur.</p>	<p>Complied</p>
<p>7.2.9</p>	<p>(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 is</p>	<p>Based on interview with Estate Management, surrounding community and field observation, there was no pesticide applied aerially in Tungkal Ulu Estate.</p>	<p>Complied</p>

	provided to affected local communities at least 48 hours prior to application of aerial spraying.	<p><u>Smallholder:</u></p> <p>Based on interview with Estate Management, surrounding community and field observation, there was no pesticide applied aerially in Tungkal Ulu Plasma.</p>	
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 year 2020 – location in at company medical healthcare attended by workers of fertilizer applicators, spraying applicator and PIC in pesticides storage.</p> <p>The result of MCU has communicated to related workers</p> <p><u>Smallholder:</u></p> <p>Most farmer members of Muara Bulian Smallholder were not directly conducted pesticide application and handling. Spraying works (pesticide application) in smallholder area were performed mostly by spraying team called TUS from PT Inti Indosawit Subur – Tungkal Ulu Estate.</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 – Tungkal Ulu and KUD’s prohibits pregnant or breast-feeding women to perform chemical spraying. To mitigate, estate performed monthly pregnancy test.</p> <p>PT Inti Indosawit Subur – Tungkal Ulu and KUD’s has also 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>	Complied

		<p>The last of pregnancy test conducted on June and July 2021 All the female sprayer in well condition and not being pregnant nor breast feeding.</p> <p><u>Smallholder:</u></p> <p>Most farmer members of Tungal Ulu Smallholder were not directly conducted pesticide application and handling. Spraying works (pesticide application) in smallholder area were performed mostly by spraying team called TUS from PT Inti Indosawit Subur – Tungal Ulu Estate.</p>	
<p>Note For 7.2.11</p> <p>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.</p>			
<p>Criteria 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.</p>			
7.3.1	<p>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>	<p>PT Inti Indosawit Subur – Tungal Ulu POM and Estate has a waste management plan, identifying type and source of waste and the disposal plan. PT Inti Indosawit Subur – Tungal Ulu POM and Estate prepared a procedure to handle hazardous waste titled “Prosedur Penanganan Limbah B3” No. AA-KL06-EFP explains methods to collecting the waste, recording in balance and disposal through licensed third party transporter. 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. Indostar Cargo. There is a mechanism “Mekanisme Penanganan Sampah Domestik” to segregate organic and inorganic waste, further to re-use or re-cycle inorganic domestic waste (such as plastic) and composting the organic domestic waste. Company has disseminated the mechanism of domestic waste handling to all employee and resident of</p>	Complied

		<p>emplacement. Domestic waste resulted from domestic housing resident segregated activity. Company provide the organic and anorganic trash can in each housing area. There are personel/workers who has been trained to collect the organic and inorganic waste and transport to landfill (TPSA).</p> <p>Smallholder: Plasma Tungkal Ulu has set the Environmental aspect and impact assessment as per "Evaluasi Aspek Dampak Lingkungan Kebun Plasma Tungkal Ulu" January 2019. The mitigation plan for environmental aspect and impact has been defined, e.g:</p> <ul style="list-style-type: none"> ➤ Manuring/Fertilizing – monitoring ex fertilizer sack, appropriate fertilizing as recommendation ➤ Weeds control - Ex Herbiicide container store in the hazardous waste storage. ➤ Pest and disease handling: Ex pesticide container store in the hazardous waste storage ➤ FFB transportation: optimizing FFB transportation by designed the TPH (FFB collecting place) in one way along collection road <p>During site visit, Smallholder are well aware of the environmental impacts and the mitigation plan. For example, the ex fertilizer sack must be handled by collected in Cooperative office to reuse as loose fruit container.</p>	
7.3.2	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.	<p>Mill and Estate: PT. Inti Indosawit Subur - Tungkal Ulu collects all hazardous waste from estate into temporary hazardous waste storage in workshop compound. The temporary hazardous waste storage has valid permit according to:</p>	Complied

		<ul style="list-style-type: none"> ➤ "Surat Izin Kepala Badan Lingkungan Hidup Kabupaten Tanjung Jabung Barat Nomor: 660/476/IX/BLHD/2014 Tentang izin Penyimpanan Sementara Limbah B3 PKS PT Inti Indosawit Subur", dated 23 September 2014 valid for 5 years. The permit covers used oil, used filter, used battery, used lamp, ex chemical container, used electronic, hand gloves, contaminated goods, ex laboratory analysis waste and used paint can. The hazardous waste with storage time 180 days with production less than 50 kg/day. ➤ "Keputusan Kepala Badan Lingkungan Hidup Kabupaten Tanjung Jabung Barat Nomor: 660/487/IX/BLHD/2014 tentang Izin Penyimpanan Sementara Limbah Bahan Berbahaya dan Beracun (B3) Perkebunan PT. Inti Indosawit Subur" dated 29 September 2014, valid for 5 years. The permit covers used oil, used filter, used battery, used lamp, ex chemical container, used electronic, hand gloves, contaminated goods, ex laboratory analysis waste and used paint can. The hazardous waste with storage time 180 days with production less than 50 kg/day. <p>PT. Inti Indosawit Subur - Tungkal Ulu has an agreement in transporting the hazardous waste with contractor that has an Environmental license. PT. Indostar Cargo as hazardous waste transporter has a valid license from Ministry of Environmental No.B.14559/Dep.IV/LH/PDAL/12/2014.</p> <p>Based on field visit at hazardous waste storage at Mill and Estate, all the chemical containers are kept safely inside the storage and completed with identity of each type of waste.</p> <p>Evidence sighted "Berita Acara Pengambilan Limbah B3 PT. IIS – Kebun Tungkal Ulu", dated 14 January 2019. Transporter and collector: PT. Indostar Cargo. Transport license: SK KLHK No: S.306/VPLB3/PPLB3/PLB.3/4/2017, dated 6 April 2017. Hazardous waste transported:</p>	
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		<ol style="list-style-type: none"> 1. Lubricant use: 800 L (4 drum). 2. Lubricant dirt: 200 L (1 drum). 3. Medical waste: 40 kg (1 bucket). 4. Chemical containers: 540 kg (18 drum). 5. Battery used: 17 pcs. <p>Smallholder: Hazardous waste from Smallholder are collected and handled by the company, particularly on pesticide containers.</p>	
7.3.3	The unit of certification does not use open fire for waste disposal.	<p>Mill and Estate: Waste management plan is documented in "Rencana pengelolaan Limbah". Waste management consists of medical waste, domestic waste, and hazardous waste to reduce pollution into the environment. Company also prepare waste management plan according to procedure such as:</p> <ul style="list-style-type: none"> ➤ Domestic waste, managed by segregation of organic and inorganic waste, transport the waste to sanitary landfill ➤ Liquid domestic waste, managed by providing septic tank and trench each house ➤ Solid waste resulted from mill such as: shell and fiber used as boiler fuel, EFB applied to plantation used as mulched and organic fertilizer ➤ Liquid waste from mill managed by application to plantation as fertilizer (Land application) ➤ Hazardous waste resulted from mill and estate managed by store in the temporary storage which has licensed and delivered to licensed transporter and collector. ➤ Waste of used goods/scrap, collect and sell to vendors ➤ Air emission, water and soil pollutant managed by dust collector installation 	Complied

		<p>The company has socialized to the workers and their families who are stay in housing complex to aware on the disposal of domestic waste to the separate waste bin (organic and an-organic). Based on field visit in estate and mill housing complex, it was found that organic and an-organic waste is separated in waste bin and also found no scattered waste. All domestic waste is disposed to the landfill (Tempat Pengumpulan Akhir Sampah).</p> <p>Based on field visit at workers housing complex, domestic waste already collected in the landfill.</p> <p>Smallholder: Plasma Tungkal Ulu has set the Environmental aspect and impact assessment as per "Evaluasi Aspek Dampak Lingkungan Kebun Plasma Tungkal Ulu" January 2019. All the smallholder members have attended the training on waste management and disposal in the oil palm plantations.</p> <p>Operational control to prevent the pollution has been determined by Cooperative (KUD) according to procedure AA-KL-06-EFP "Penanganan Limbah Bahan Berbahaya dan Beracun". Sample seen in KUD Sawit Kita, Karya Kita, Karya Jaya, Panca Mukti, Sari Bumi and KUD Sawit Mulia</p> <p>. There is also a mechanism to handle domestic waste in KUD "Mekanisme Penanganan Sampah Domestik" to segregate organic and inorganic waste, further to reuse or re-cycle inorganic domestic waste (such as plastic) and composting the organic domestic waste.</p>	
<p>Criteria 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.</p>			

<p>7.4.1</p>	<p>Good agricultural practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts is documented.</p>	<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> <p>Onsite audit:</p> <p>During the audit known that the management unit has applied fertilizer according to the fertilizer’s recommendation issued by Asian Agri Research and Development Department. Based on field visit in Block D18a Afdeling 4 using Amonium Clorida with dosage 1.5 kg/palm (this is in accordance with fertilizer’s recommendation 2021).</p> <p>In addition, management unit also applied POME application especially in early mature area to maintain soil fertility and increase production. The POME applied with dosage 800 m3/Ha/year.</p> <p>Based on interview with smallholders, most of their plots is no longer applied with fertilizer due to in replanting preparation in 2023 – 2023.</p>	<p>Complied</p>
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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 5 years while leaf sampling conducted annually. 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 June 2016. Parameter that tested is N, C, K, Ca, Mg and pH. • The last leaf sampling conducted on July 2020. Parameter that tested is major element (Ash, N, P, K Mg, Ca) dan Minor element (B, Cu, Zn, Mn, Fe). <p>Those reports are converted to be fertilizer recommendation by Asian Agri’s Research and Development Department.</p>	Complied
7.4.3	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>Own Estates</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 Tungkal Ulu Estate which is near the Tungkal Ulu mill.</p> <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 2020 and 2021.</p>	Complied

		<p>Onsite Audit:</p> <p>Muara Bulian Estate:</p> <p>During this visit, auditor has observed the application of organic and inorganic fertilizers. For example: there is application Amonium Clorida in D18a Afdeling 4 using Amonium Clorida with dosage 1.5 kg/palm (this is in accordance with fertilizer's recommendation 2021).</p> <p>Scheme Smallholder:</p> <p>During the audit, there is no manuring schedule matched with audit date. However, auditor team was observed the manuring record. For example, manuring record with using NPK dosage 1.5 kg/tree in KUD Sari Bumi.</p>	
7.4.4	Records of fertilizer inputs are maintained.	Record of fertilizer application in estate are in places. For example, there is a record of application Amonium Clorida with dosage 1.5 kg/palm (this is in accordance with fertilizer's recommendation 2021).	Complied
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>Estate:</p> <p>Soil Analysis carried out in September 2010. Reported under "<i>Laporan Survey Tanah Semidetil Area Perkebunan Kelapa Sawit PT. Inti Indosawit Subur Kebun Tungkal Ulu</i>". 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.</p> <p>PT Inti Indosawit Subur Tungkal Ulu has "<i>Peta Satuan Peta Tanah PT Inti Indosawit Subur Kebun Tungkal Ulu</i>" with scale 1 : 35,000. Based</p>	Complied

		<p>on soil suitability, consist of: S2 2,357.5 Ha (47.3%) with limiting factor of low natural fertility with low pH; S3 2,200.1 Ha (44.7%) with limiting factor of topographic condition (slope 15-30%); N1 (not suitable) 391.4 Ha (8%) with limiting factor of slope more than 30%. Based on soil survey semi detail, soil classification in Tungkal Ulu Estate consist of:</p> <ul style="list-style-type: none"> - <i>Typic Dystrudepts;</i> - <i>Typic endoaquepts;</i> - <i>Typic endoaquults;</i> - <i>Typic hapludox;</i> - <i>Typic hapludults;</i> - <i>Typic kandiudults;</i> <p>Smallholder:</p> <p>Group manager has kept and maintain the soil map of Plasma Tungkal Ulu in the office. There are 3 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> <ul style="list-style-type: none"> - <i>Typic Dystrudepts</i> - <i>Typic Kandiudults</i> - <i>Typic Hapludults</i> <p>Soil map and soil survey result recorded in "<i>Laporan Survei Tanah Tinjau Kebun Plasma Tungkal Ulu</i>". PT Inti Indosawit Subur - Plasma Tungkal Ulu has "<i>Peta Satuan Peta Tanah PT Inti Indosawit Subur Kebun Plasma Tungkal Ulu</i>" with scale 1 : 70,000.</p> <p>Based on soil survey semi detail map and Field visit in Tungkal Ulu Estate, it can be shown that there is no fragile soil in Tungkal Ulu Estate.</p>	
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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 undulating area areas known that the management unit has provide terrace contour. The management unit also provide legume cover crop and frond stacking treatment 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 Tungkal Ulu Estate. Not Applicable	Not Applicable
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	(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>Certificate holder through Agri Agri's Research and Development Department has conducted soil mapping 2010. They also had SOP AA-APM-OP-1100.05-R3 dated 23 November 2016: <i>Konservasi Tanah dan Air</i> (Soil & Water Conservation) as guidance for soil conservation in each topography. The slope in the plantation, between 0-30%. (Steep slope categorized as >20° or 40%, Hilly slope between 13° – 20°. Terracing made in the slope 10° – 15°).</p> <p>Soil Analysis carried out in September 2010. Reported under "<i>Laporan Survey Tanah Semidetil Area Perkebunan Kelapa Sawit PT. Inti Indosawit Subur Kebun Tungkal Ulu</i>". 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.</p> <p>PT Inti Indosawit Subur Tungkal Ulu has "<i>Peta Satuan Peta Tanah PT Inti Indosawit Subur Kebun Tungkal Ulu</i>" with scale 1 : 35,000. Based on soil suitability, consist of: S2 2,357.5 Ha (47.3%) with limiting factor</p>	Complied

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		<p>of low natural fertility with low pH; S3 2,200.1 Ha (44.7%) with limiting factor of topographic condition (slope 15-30%); N1 (not suitable) 391.4 Ha (8%) with limiting factor of slope more than 30%. Based on soil survey semi detail, soil classification in Tungkal Ulu Estate consist of:</p> <ul style="list-style-type: none"> - <i>Typic Dystrudepts;</i> - <i>Typic endoaquepts;</i> - <i>Typic endoaquults;</i> - <i>Typic hapludox;</i> - <i>Typic hapludults;</i> - <i>Typic kandiudults;</i> <p>Smallholder:</p> <p>Group manager has kept and maintain the soil map of Plasma Tungkal Ulu in the office. There are 3 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> <ul style="list-style-type: none"> - <i>Typic Dystrudepts</i> - <i>Typic Kandiudults</i> - <i>Typic Hapludults</i> <p>Soil map and soil survey result recorded in "<i>Laporan Survei Tanah Tinjau Kebun Plasma Tungkal Ulu</i>". PT Inti Indosawit Subur - Plasma Tungkal Ulu has "<i>Peta Satuan Peta Tanah PT Inti Indosawit Subur Kebun Plasma Tungkal Ulu</i>" with scale 1 : 70,000.</p> <p>During this audit, auditor has been confirmed that there is no new planting (land extension) of PT Inti Indosawit Subur or plasma area. It is only replanting activity that conducted in 2015.</p>	
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		According to the type soil in Plasma Tungkal Ulu, there is no fragile soil identified in plasma area of Tungkal Ulu.	
7.6.2	Extensive planting on marginal and fragile soils is avoided or, if necessary, carried out according to the best-practice soil management plan.	During this audit, auditor has been confirmed that there is no new planting (land extension) of PT Inti Indosawit Subur or plasma area. It is only replanting activity that conducted in 2016, 2017, 2018 and 2019. Replanting activity in steep area using a terrace contour for soil conservation.	Complied
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	According to soil survey 2009, Tungkal Ulu Estate and its smallholders are categorized mineral soil. No peatland area within this unit of certification.	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.	<p>Based on the semi-detailed soil analysis, the soil type falls into loam and clay. Based on soil survey semi detail, soil classification in Tungkal Ulu Estate consist of:</p> <ul style="list-style-type: none"> - <i>Kompleks Typic Dystrudepts</i> - <i>Typic Endoaquepts</i> - <i>Typic Endoaquils</i> - <i>Typic Hapludox</i> - <i>Typic Hapludults</i> - <i>Typic Kandiudults</i> <p>There is no peat soil identified within PT. Inti Indosawit Subur – Tungkal Ulu Estate. This indicator is not applicable.</p> <p>Smallholder:</p>	Not Applicable

		<p>Based on soil survey performed by Asian Agri Research and Development, it was verified that there is no peat soil indicated in Tungkal Ulu Scheme Smallholder. There are 3 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> <ul style="list-style-type: none"> - <i>Typic Dystrudepts</i> - <i>Typic Kandiudults</i> - <i>Typic Hapludults</i> <p>This indicator is not applicable.</p>	
7.7.2	<p>Peat areas within the managed area are inventoried, documented and reported to the RSPO Secretariat (effective from November 15, 2018).</p>	<p>Based on the semi-detailed soil analysis, the soil type falls into loam and clay. Based on soil survey semi detail, soil classification in Tungkal Ulu Estate consist of:</p> <ul style="list-style-type: none"> - <i>Kompleks Typic Dystrudepts</i> - <i>Typic Endoaquepts</i> - <i>Typic Endoaquils</i> - <i>Typic Hapludox</i> - <i>Typic Hapludults</i> - <i>Typic Kandiudults</i> <p>There is no peat soil identified within PT. Inti Indosawit Subur – Tungkal Ulu Estate. This indicator is not applicable.</p> <p>Smallholder:</p> <p>Based on soil survey performed by Asian Agri Research and Development, it was verified that there is no peat soil indicated in Tungkal Ulu Scheme Smallholder. There are 3 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>	<p>Not Applicable</p>

		<ul style="list-style-type: none"> - <i>Typic Dystrudepts</i> - <i>Typic Kandiuults</i> - <i>Typic Hapludults</i> <p>This indicator is not applicable.</p>	
<p>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).</p>			
7.7.3	<p>(C) Subsidence of peat is monitored, documented and minimised.</p>	<p>Based on the semi-detailed soil analysis, the soil type falls into loam and clay. Based on soil survey semi detail, soil classification in Tungkal Ulu Estate consist of:</p> <ul style="list-style-type: none"> - <i>Kompleks Typic Dystrudepts</i> - <i>Typic Endoaquepts</i> - <i>Typic Endoaquults</i> - <i>Typic Hapludox</i> - <i>Typic Hapludults</i> - <i>Typic Kandiuults</i> <p>There is no peat soil identified within PT. Inti Indosawit Subur – Tungkal Ulu Estate. This indicator is not applicable.</p> <p>Smallholder:</p> <p>Based on soil survey performed by Asian Agri Research and Development, it was verified that there is no peat soil indicated in Tungkal Ulu Scheme Smallholder. There are 3 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> <ul style="list-style-type: none"> - <i>Typic Dystrudepts</i> 	<p>Not Applicable</p>



		<ul style="list-style-type: none"> - <i>Typic Kandiuults</i> - <i>Typic Hapludults</i> <p>This indicator is not applicable.</p>	
7.7.4	<p>(C) Availability of implementation evidence of the water and land cover management program.</p>	<p>Based on the semi-detailed soil analysis, the soil type falls into loam and clay. Based on soil survey semi detail, soil classification in Tungkal Ulu Estate consist of:</p> <ul style="list-style-type: none"> - <i>Kompleks Typic Dystrudepts</i> - <i>Typic Endoaquepts</i> - <i>Typic Endoaquults</i> - <i>Typic Hapludox</i> - <i>Typic Hapludults</i> - <i>Typic Kandiuults</i> <p>There is no peat soil identified within PT. Inti Indosawit Subur – Tungkal Ulu Estate. This indicator is not applicable.</p> <p>Smallholder:</p> <p>Based on soil survey performed by Asian Agri Research and Development, it was verified that there is no peat soil indicated in Tungkal Ulu Scheme Smallholder. There are 3 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> <ul style="list-style-type: none"> - <i>Typic Dystrudepts</i> - <i>Typic Kandiuults</i> - <i>Typic Hapludults</i> 	Not Applicable

		This indicator is not applicable.	
7.7.5	<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>Based on the semi-detailed soil analysis, the soil type falls into loam and clay. Based on soil survey semi detail, soil classification in Tungkal Ulu Estate consist of:</p> <ul style="list-style-type: none"> - <i>Kompleks Typic Dystrudepts</i> - <i>Typic Endoaquepts</i> - <i>Typic Endoaquults</i> - <i>Typic Hapludox</i> - <i>Typic Hapludults</i> - <i>Typic Kandiodults</i> <p>There is no peat soil identified within PT. Inti Indosawit Subur – Tungkal Ulu Estate. This indicator is not applicable.</p> <p>Smallholder:</p> <p>Based on soil survey performed by Asian Agri Research and Development, it was verified that there is no peat soil indicated in Tungkal Ulu Scheme Smallholder. There are 3 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> <ul style="list-style-type: none"> - <i>Typic Dystrudepts</i> - <i>Typic Kandiodults</i> - <i>Typic Hapludults</i> <p>This indicator is not applicable.</p>	Not Applicable

<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>		
<p>7.7.6</p>	<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>Based on the semi-detailed soil analysis, the soil type falls into loam and clay. Based on soil survey semi detail, soil classification in Tungkal Ulu Estate consist of:</p> <ul style="list-style-type: none"> - <i>Kompleks Typic Dystrudepts</i> - <i>Typic Endoaquepts</i> - <i>Typic Endoaquils</i> - <i>Typic Hapludox</i> - <i>Typic Hapludults</i> - <i>Typic Kandiudults</i> <p>There is no peat soil identified within PT. Inti Indosawit Subur – Tungkal Ulu Estate. This indicator is not applicable.</p> <p>Smallholder:</p> <p>Based on soil survey performed by Asian Agri Research and Development, it was verified that there is no peat soil indicated in Tungkal Ulu Scheme Smallholder. There are 3 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> <ul style="list-style-type: none"> - <i>Typic Dystrudepts</i> - <i>Typic Kandiudults</i> - <i>Typic Hapludults</i>

		<p>This indicator is not applicable.</p>	
<p>7.7.7</p>	<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 Palm Cultivation that already exists in Peatlands' (the latest version) along with relevant audit guidelines.</p>	<p>Based on the semi-detailed soil analysis, the soil type falls into loam and clay. Based on soil survey semi detail, soil classification in Tungkal Ulu Estate consist of:</p> <ul style="list-style-type: none"> - <i>Kompleks Typic Dystrudepts</i> - <i>Typic Endoaquepts</i> - <i>Typic Endoaquils</i> - <i>Typic Hapludox</i> - <i>Typic Hapludults</i> - <i>Typic Kandiodults</i> <p>There is no peat soil identified within PT. Inti Indosawit Subur – Tungkal Ulu Estate. This indicator is not applicable.</p> <p>Smallholder:</p> <p>Based on soil survey performed by Asian Agri Research and Development, it was verified that there is no peat soil indicated in Tungkal Ulu Scheme Smallholder. There are 3 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> <ul style="list-style-type: none"> - <i>Typic Dystrudepts</i> - <i>Typic Kandiodults</i> - <i>Typic Hapludults</i> <p>This indicator is not applicable.</p>	<p>Not Applicable</p>

Criteria 7.8: Practices maintain the quality and availability of surface and groundwater.

No	Category of River	Cross Section	Outside the Settlement		Inside at the Settlement		Articles
			Criteria	Minimum Riparian Zone	Criteria	Minimum Riparian Zone	
1	Levee		-	5 m	-	3 m	Article 6
2	Rivers with no dike (from river bank)		Big River River Basin > 500 km2	100 m	Depth : > 20 m	30 m	Articles 7 & 8
					Depth : 3 m to 20 m	15 m	Articles 7 & 8
			Small River River Basin < 500 km2	50 m	Depth : 0 m to 3 m	10 m	Articles 7 & 8
3	Lake / Reservoir		-	50 m	-	50 m	Article 10
4	Water Springs		-	200 m	-	200 m	Article 10
5	Rivers affected by tides (from river bank)		-	100 m	-	100 m	Article 10

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>Mill and Estate:</p> <p>The Certificate Holder and scheme Smallholder have established water management plan, consist of management water supply for domestic, water consumption and measurement of water quality.</p> <p>Identification water need as regulated in "Peraturan Menteri PU No.14/PRT/M/2010 (domestic consumption is 60 liters/person/day and water needed for mill processing, Ground and surface water resources and its permit, management and monitoring waste water, included domestic waste water.</p> <p>Company has obtained permit to use the surface water from Benanak River according to "Keputusan Kepala Dinas Penanaman Modal dan Pelayanan terpadu Satu Pintu provinsi Jambi Nomor 149/KEP.KA.DPM-PTSP-5.1/SIPAP/VIII/2018 Tentang Pemberian Izin Pengambilan dan Pemanfaatan Air Permukaan Pada Sungai Benanak Kepada PT Inti Indosawit Subur" dated 23 August 2018, valid until 5 years since issued.</p>	Complied
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		<p>The Company has a water management document, both in the estate and mill. Monitoring the implementation of water management has been implemented on a regular basis, such as surface water quality monitoring each semester at Benanak river and Lampisi river (upstream and downstream) are available in the report of RKL/RPL. Company has analysed water quality each semester to ensure the compliance against PP No. 82 tahun 2001 regarding water quality standard, the result of water quality monitoring on 30 April 2021 by Laboratory PT. ITEC Solution Indonesia (sample No. D.04.457-1.ad-AP.21, D.04.457-1.ae-AP.21, D.04.457-1.af-AP.21, D.04.457-1.ag-AP.21) shown that water quality is complies with national regulation.</p> <p>Procedure SOP AA-APM-OP-1100.05. R1 "Konservasi Tanah dan Air" has been established to maintain the quality and availability of water. Procedures was also established for protection and management of riparian buffer zones at or before replanting. Procedure mentioned that in 50m on the left and right side of riparian buffer zones, estates are prohibited to apply agrochemical, used manual manuring and river bank was planted by erosion barrier crop (planting of "vetiver" grass, <i>Pheronema canescens</i> and <i>Bamboosa sp</i>). The organisation also has policy that prohibits estates for planting in 50m on the left and right side of riparian buffer zones at or before replanting. Warning board placed regarding prohibition to apply agrochemicals and fertiliser in the buffer zone. Riparian buffers of small natural water courses were 50 metres wide on both sides of the rivers as defined in the procedure AA-KL-12-EFP "Restorasi Riparian dan Areal Sekitar Danau/Waduk atau Mata Air lainnya". Several evidence of maintaining quality and availability of water were evident, such as plan and realisation of riparian management, installation of warning boards, planting erosion prevention plan (e.g. <i>Pheronema canescens</i>, <i>Terminalia cattapa</i>, <i>Bamboosa sp</i> and vetiver grass) and monitoring of water quality.</p>	
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		<p>PT Inti Indosawit Subur – Tungkal Ulu does not limit access to clean water or does not pollute the water used by the community. Company has monitor clean water quality each semester to ensure the water use by community and employee are met with standard Permenkes No. 32 Tahun 2017 regarding clean water quality standard. Latest monitoring on 30 April 2021 by Laboratory PT. ITEC Solution Indonesia (sample No. D.04.457-1.y-AM.21, D.04.457-1.z-AM.21, D.04.457-1.aa-AM.21) shown that water quality is met with the standard.</p> <p>In Mill scope, water consumption for FFB processing is more concern to ensure the water use is in line with budget. While in Estate scope, water quality is more preferred to prevent any pollution impact environmentally.</p> <p>Smallholder: For Smallholder, water management applied is focused on protection of riparian zone. The activity is only maintained the riparian zone from pesticides application.</p>	
	<p>7.8.1b Workers have adequate access to clean water.</p>	<p>According to field visit, company provided housing complex that adequate facilities has been available for mill workers, including: housing for staff, housing for workers (permanent and temporary), electricity from mill grid, clean water supply from water treatment plant (available for entire year), medical service in company’s clinic, primary level education facility, religion and worship facility, and sport.</p> <p>Company provide the clean water for workers at housing area with clean water from Muara Bulian Mill. Regular water analysis was performed to monitor the water quality. Water analysis performed by accredited laboratory “PT. ITEC Solution Indonesia” each semester for Clean water. Sample seen on Clean Water analysis on 30 April 2021 by Laboratory PT. ITEC Solution Indonesia (sample No. D.04.457-1.y-AM.21, D.04.457-1.z-AM.21, D.04.457-1.aa-AM.21); standard refer to</p>	

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		PermenKes No. 32 year 2017 Appendix I, Chapter IIA, analysis result shown that all parameter analyzed are met with the standard regulation. Interview with workers during onsite audit confirmed that they have adequate access to clean water provide by company.	
7.8.2	(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>PT Inti Indosawit Subur – Tungkal Ulu 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 (<i>Pterocarpus indicus, pheronema canescens, vetiver, Terminalia cattapa, Ficus sp.</i>). - Establish zone for zero chemical. No spraying and fertilizing along riparian zone. Based on visit in riparian zone (Sempadan Sungai Benanak) - Conserve the natural vegetation in riparian zone - Restricted to conduct replanting palm oil in riparian area <p>During field visit to Sungai Benanak Block B20A, Division II can be shown that riparian area are well maintained, no chemical application near to riparian, no disturbance on riparian, natural vegetation are protected and the signboard information and awareness are available.</p>	Complied
7.8.3	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>Effluent from Tungkal Ulu Mill applied to plantation area as Land Application.</p> <p>Monitoring of effluent conducted in monthly period. BOD Analysis performed by DLH UPTD Lab. Lingkungan Daerah PemProv. Jambi, accredited by KAN LP-413-IDN.</p>	Complied

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No	Month	pH	BOD ₅	COD	BOD Threshold Value
1	Jan	7.55	4,830	8,240	5,000
2	Feb	8.05	600	1,728	
3	March	5.81	1,005	3,336	
4	April	7.45	3,220	6,720	
5	May	7.86	1,692	3,142	
6	June	8.27	1,446	2,648	
7	July	8.23	1,205	2,060	
8	August	8.21	1,206	2,265	

Smallholder:
N/A

No	Month	pH	BOD ₅	COD	BOD Threshold Value
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7.8.4	Mill water use per tonne of FFB is monitored and recorded.	<p>Effluent from Tungkal Ulu Mill applied to plantation area as Land Application.</p> <p>Monitoring of effluent conducted in monthly period. BOD Analysis performed by DLH UPTD Lab. Lingkungan Daerah PemProv. Jambi, accredited by KAN LP-413-IDN.</p>	Complied
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	1	Jan	7.55	4,830	8,240	5,000		
	2	Feb	8.05	600	1,728			
	3	March	5.81	1,005	3,336			
	4	April	7.45	3,220	6,720			
	5	May	7.86	1,692	3,142			
	6	June	8.27	1,446	2,648			
	7	July	8.23	1,205	2,060			
	8	August	8.21	1,206	2,265			
<p>Smallholder: N/A</p>								

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	<p>All energy used in both mills is monitored and recorded under document of "<i>Laporan Unit Pabrik 2020</i>" and "<i>Pemakaian Energi Pabrik Tungkal Ulu 2020</i>". Fossil fuel records are maintain and trends shown. Energy use records include accurate measurements of renewable energy use per tonne of FFB processed. All the shell and fibre is consumed internally as boiler fuel.</p> <p>Tungkal Ulu POM is using 100% fiber and most of shell production for power generation during FFB processing. The fiber and nut shell is by-product from CPO production. Tungkal Ulu POM has calculated the total energy required for process, based on FFB tonnage x steam required to process one ton FFB x energy required to generate one kg steam. Muara Bulian POM has also calculated the potential energy generated from</p>	Complied
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		<p>using fiber and nut shell. From calculation it was known that there is energy surplus, whereby used as power generation when mill is in operation but not processing FFB (electricity source, cleaning, etc.).</p> <p>Until June 2021, FFB processing in Tungkal Ulu Palm Oil Mill was 112,891 tons, producing 22,629 tons CPO. Total energy use for Palm Oil Mill process was 402.07 MJ/ton CPO, energy use from Fossil fuel was 26.87 MJ/ton CPO and energy use from renewable source (shell and fibre) was 375.20 MJ/ton CPO. From the total energy use for palm oil mill process can be shown that renewable energy use was 93% and energy from fossil fuel was 7%.</p> <p>Fossil fuel usage is recorded for operational purpose, including the efficiency analysis. Total diesel fuel usage since January – May 2021 by Tungkal Ulu POM was 25,125 litre for operational Genset and heavy equipment and in 2021 was 58,396 litre. Total diesel fuel usage in Tungkal Ulu Estate since January – June 2018 was 156,866 litre. Tungkal Ulu Estate has a programme for efficiency of fossil fuel usage by increasing the ratio on diesel fuel usage (km/l) minimum 3.80 km/L for operational dump truck.</p> <p>During audit, can be shown that efficiency for diesel fuel usage has been minimize by monitoring klep stell, air cleaner maintenance, tire pressure monitoring, and stel nozzle monitoring.</p> <p><u>Smallholders:</u></p>	
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		<p>Group Manager Plasma Muara Bulian has prepared a plan for improving efficiency of the use of fossil fuels and to optimise renewable energy, under document "Program Efisiensi Penggunaan Bahan Bakar Fosil dan Energi Terbarukan", following plan to mitigate polluting activities, i.e:</p> <ul style="list-style-type: none"> • Optimizing FFB transportation by designed the TPH (FFB collecting place) in one way at collection road • Fossil fuel efficiency by test run and regular service of dump truck <p>During audit can be demonstrated that Plasma Muara Bulian has implementing the TPH design in one way at collection road. Sample seen in KUD Budi Sari, KUD Karya Lestari, KUD Tuah Sakato, KUD Subur Makmur</p> <p>Plasma Tungkal monitor the fossil fuel usage regularly and monitoring the trip of dump truck.</p>	
<p>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.</p>			
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>Mill and Estate:</p> <p>List for assessing pollution and emission sources, including gaseous, particles, soot emissions and effluent provided in document "Identifikasi Aspek Dampak Lingkungan untuk PMKS dan Estate di Tungkal Ulu", dated 14 January 2020.</p> <p>The identification listed all relevant activities that generate pollution and emission from office, plantations, palm oil mill, mill effluent treatment up to workers activities, such as:</p> <ul style="list-style-type: none"> ▪ Boiler stack emission including particulate and soot ▪ Diesel electric generator emission ▪ POME methane emission 	Complied

		<ul style="list-style-type: none"> ▪ Use of fertilizer ▪ Use of Pesticide ▪ Diesel fuel usage ▪ Vehicle and heave equipment emission <p>All the activities of mill and estate as well as the waste generated has been well documented, for examples the operational activities 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>The company has developed pollution and emission reduction plan. The plan covers planning, implementing plans and monitoring activities generating pollution and emission. Reduction of pollution such as:</p> <ul style="list-style-type: none"> ▪ POME application/Land application permitted for plantation in mineral soil. ▪ Hazardous waste storage management and monitoring (permitted by government) ▪ Domestic waste management by sanitary landfill ▪ Emission measurement each semester from Boiler, Genset, Heavy equipment and vehicle. ▪ Biogas Plant with capacity 3 MW. <p>Emission monitoring system by using "RSPO PalmGHG" system calculation version 4. Emission from estate and mill operation was calculated and monitored, emission reduction achieved. The result of GHG calculation available in appendix C.</p> <p>Smallholder:</p>	
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		Document(s) assessing pollution and emission sources, including gaseous, particles, soot emissions and effluent has been provided by Group Manager Plasma Tungkal Ulu as per “ <i>Identifikasi Sumber Polusi di Perkebunan Petani</i> ” dated 12 January 2021.	
7.10.2	(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 (following the RSPO GHG Assessment Procedure for New Development).	There is no new planting within certified area of PT Inti Indosawit Subur – Tungkal Ulu Estate and Tungkal Ulu Plasma after November 2005. Currently, replanting activities still in progress. Original year of Planting for Tungkal Ulu Estate are 1990, 1991, 1993 and 2003. While year of Planting for Tungkal Ulu Plasma are 1990, 1991, 1992, 1993 and 1994. This indicator is not applicable.	Complied
7.10.3	(C) Other significant pollutant identification results are available and plans to reduce or minimize them are implemented and monitored.	There is no new planting within certified area of PT Inti Indosawit Subur – Tungkal Ulu Estate and Tungkal Ulu Plasma after November 2005. Currently, replanting activities still in progress. Original year of Planting for Tungkal Ulu Estate are 1990, 1991, 1993 and 2003. Wilst year of Planting for Tungkal Ulu Plasma are 1990, 1991, 1992, 1993 and 1994. This indicator is not applicable.	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.	PT Inti Indosawit Subur – Tungkal Ulu POM established Company Policy signed by Managing Director, Kevin Tio, on 1 December 2014. Point 6 of the policy stated the company uses Zero Burning practice in developing plantation and actively support initiative to prevent and monitor forest fire and haze. Based on field observation to Block B91c that will become B18k, it was evident that no fire has been used for replanting in Tungkal Ulu Estate.	Complied

		<p><u>Smallholder:</u></p> <p>The Smallholder Manager has prepared the policy that there were no land preparation by burning, as per "Kebijakan Manager Plasma Tungkal Ulu" dated 2 December 2020, in poin 6: "Melakukan praktek tanpa bakar dalam kegiatan pembangunan perkebunan dan petani maupun desa secara aktif mendukung inisiatif mencegah mengawasi kebakaran hutan dan asap" (Implementing non-burning practices in plantation development activities, farmers and villages actively support initiatives to prevent and control forest fires and smoke).</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>PT Inti Indosawit Subur – Tungkal Ulu POM established Company Policy signed by Managing Director, Kevin Tio, on 1 December 2014. Point 6 of the policy stated the company uses Zero Burning practice in developing plantation and actively support initiative to prevent and monitor forest fire and haze.</p> <p>Based on field observation to Block B91c that will become B18k, it was evident that no fire has been used for replanting in Tungkal Ulu Estate.</p> <p><u>Smallholder:</u></p> <p>The Smallholder Manager has prepared the policy that there were no land preparation by burning, as per "Kebijakan Manager Plasma Tungkal Ulu" dated 2 December 2020, in poin 6: "Melakukan praktek tanpa bakar dalam kegiatan pembangunan perkebunan dan petani maupun desa secara aktif mendukung inisiatif mencegah mengawasi kebakaran hutan</p>	Complied

		<p>dan asap” (Implementing non-burning practices in plantation development activities, farmers and villages actively support initiatives to prevent and control forest fires and smoke).</p>	
7.11.3	<p>The unit of certification engages stakeholders in adjacent locations for fire prevention and control measures.</p>	<p>PT Inti Indosawit Subur – Tungkal Ulu POM established Company Policy signed by Managing Director, Kevin Tio, on 1 December 2014. Point 6 of the policy stated the company uses Zero Burning practice in developing plantation and actively support initiative to prevent and monitor forest fire and haze.</p> <p>Based on field observation to Block B91c that will become B18k, it was evident that no fire has been used for replanting in Tungkal Ulu Estate.</p> <p><u>Smallholder:</u></p> <p>The Smallholder Manager has prepared the policy that there were no land preparation by burning, as per “Kebijakan Manager Plasma Tungkal Ulu” dated 2 December 2020, in poin 6: “Melakukan praktek tanpa bakar dalam kegiatan pembangunan perkebunan dan petani maupun desa secara aktif mendukung inisiatif mencegah mengawasi kebakaran hutan dan asap” (Implementing non-burning practices in plantation development activities, farmers and villages actively support initiatives to prevent and control forest fires and smoke).</p>	Complied

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.

PROCEDURAL NOTE for 7.12:

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.

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.

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.

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.

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.

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>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>There is no new planting within certified area of PT Inti Indosawit Subur – Tungkal Ulu Estate and Tungkal Ulu Plasma after November 2005. Currently, replanting activities still in progress. Original year of Planting for Tungkal Ulu Estate are 1990, 1991, 1993 and 2003. Wilst year of Planting for Tungkal Ulu Plasma are 1990, 1991, 1992, 1993 and 1994.</p> <p>Company has conducted HCV identification on 28 February – 11 March 2011 cooperation with “Fakultas Kehutanan Institut Pertanian Bogor”. Final report presented in “Laporan Final Kajian Penuh Identifikasi dan Analisis Keberadaan High Conservation Value di Areal PT. Inti Indosawit Subur – Tungkal Ulu Estate, Provinsi Jambi”. HCV identified in Tungkal ulu Estate total 128.322 ha, most of HCV identified are riparian.</p> <p>Company has a procedure of HCV management and monitoring. In addition company has establish the procedure of Riparian as per “AA APM OP 1100.21.R2 dated 7 December 2015. Explain in point 4.3 of</p>	Complied
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		<p>procedure that before replanting conducted, boundary marking of HCV shall be performed and mapping the HCV area to ensure that the HCV area protected and no replanting activity inside HCV/Riparian area. According to field observation in HCV area of Sungai Benanak Block B20A, Division II shown that HCV area boundary marking clearly visible and maintained and replanting activity was not overlapped to HCV area.</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>Estate and Smallholder:</p> <p>Company has conducted HCV identification on 28 February – 11 March 2011 cooperation with “Fakultas Kehutanan Institut Pertanian Bogor”. Final report presented in “Laporan Final Kajian Penuh Identifikasi dan Analisis Keberadaan High Conservation Value di Areal PT. Inti Indosawit Subur – Tungkal Ulu Estate, Provinsi Jambi”. The HCV assessment conducted based on “Panduan Kawasan Bernilai Konservasi Tinggi di Indonesia”, issued by Konsorsium Revisi HCV Toolkit Indonesia dated 12 July 2008.</p> <p>HCV identified in Tungkal ulu Estate total 128.322 ha consist of:</p> <p>HCV 1.2 and 4.1: Benanak river 81.9 ha, Lampisi river 8.15 ha, Jitan river 4.48, Serayu river 5.54 ha, Beranak-1 small river 8.58 ha, Beranak-2 small river 7.32 ha, Serayu small river 3.04 ha, pool water reservoir area.</p> <p>HCV 6. Makam Panjang Datuk ratu 0.0025 ha, Kuburan Desa Lampisi-1 (Lampisi I Village Graveyard) 0.5 ha, Kuburan Desa lampisi-2 (Lampisi II Village Graveyard) 0.5 ha, Kuburan Desa Tanjung Beranak (Tanjung Beranak Village Grveyard) 2 ha, Kuburan Desa Bukit Harapan (Bukit Harapan Village Graveyard) 0.25 ha, Kuburan Desa Pinang Gading (Pinang Gading Village Graveyard) 2 ha.</p> <p>The HCV identification document has explained the general condition of landscape surrounding company’s plantation: there is no protected</p>	<p>Complied</p>

		<p>forest/ecosystem that feasible for wildlife to maintain its viability. Therefore no recommendation for wildlife corridor.</p>	
	<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>	<p>There is no new planting within certified area of PT Inti Indosawit Subur – Tungkal Ulu Estate and Tungkal Ulu Plasma after November 2005. Currently, replanting activities still in progress. Original year of Planting for Tungkal Ulu Estate are 1990, 1991, 1993 and 2003. Wilst year of Planting for Tungkal Ulu Plasma are 1990, 1991, 1992, 1993 and 1994. Company has conducted HCV identification on 28 February – 11 March 2011 cooperation with “Fakultas Kehutanan Institut Pertanian Bogor”. Final report presented in “Laporan Final Kajian Penuh Identifikasi dan Analisis Keberadaan High Conservation Value di Areal PT. Inti Indosawit Subur – Tungkal Ulu Estate, Provinsi Jambi”.</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> <p>HCV identified in Tungkal ulu Estate total 128.322 ha.</p>	
<p>7.12.3</p>	<p>(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>	<p>According to HCV assessment result, confirmed that there is no High Forest Cover Landscapes (HFCLs).</p> <p>HCV identified in Tungkal ulu Estate total 128.322 ha consist of:</p> <p>HCV 1.2 and 4.1: Benanak river 81.9 ha, Lampisi river 8.15 ha, Jitan river 4.48, Serayu river 5.54 ha, Beranak-1 small river 8.58 ha, Beranak-2 small river 7.32 ha, Serayu small river 3.04 ha, pool water reservoir area.</p>	<p>Complied</p>

		<p>HCV 6. Makam Panjang Datuk ratu 0.0025 ha, Kuburan Desa Lampisi-1 (Lampisi I Village Graveyard) 0.5 ha, Kuburan Desa lampisi-2 (Lampisi II Village Graveyard) 0.5 ha, Kuburan Desa Tanjung Beranak (Tanjung Beranak Village Grveyard) 2 ha, Kuburan Desa Bukit Harapan (Bukit Harapan Village Graveyard) 0.25 ha, Kuburan Desa Pinang Gading (Pinang Gading Village Graveyard) 2 ha.</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>	
<p>PROCEDURAL NOTE for 7.12.3: Indicator 7.12.3. is not relevant to Indonesia, until further decisions by the RSPO.</p>			
<p>7.12.4</p>	<p>(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 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>There is no new planting within certified area of PT Inti Indosawit Subur – Tungkal Ulu Estate and Tungkal Ulu Plasma after November 2005. Currently, replanting activities still in progress. Original year of Planting for Tungkal Ulu Estate are 1990, 1991, 1993 and 2003. Wilst year of Planting for Tungkal Ulu Plasma are 1990, 1991, 1992, 1993 and 1994.</p> <p>Company has conducted HCV identification on 28 February – 11 March 2011 cooperation with "Fakultas Kehutanan Institut Pertanian Bogor". Final report presented in "Laporan Final Kajian Penuh Identifikasi dan Analisis Keberadaan High Conservation Value di Areal PT. Inti Indosawit Subur – Tungkal Ulu Estate, Provinsi Jambi". HCV assessment was conducted in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations. HCV identified in Tungkal ulu Estate total 128.322 ha.</p> <p>The Company has made a conservation management and monitoring plan to protect and conserve RTE species and monitor the presence of wildlife species and wildlife populations as well as protected plants/animal in and around the plantation.</p>	<p>Complied</p>

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		RTE species and wildlife monitoring is conducted monthly by foreman and clerk afedling/division. The animal/species findings are recorded in the "Daftar Temuan Satwa liar di Areal kebun" form. Evidence of wildlife monitoring can be demonstrated during audit. Since July 2020 – June 2021 monitoring, it was observed the presence of animal such as: <i>Naja sumatrana</i> , <i>Varanus salvator</i> , <i>Macaca fascicularis</i> , <i>Sus crova</i> , <i>Paradoxurus hermaphroditus</i> , <i>Tyto alba</i> , <i>Felis bengalensis</i> , <i>Copsychus saularis</i> , <i>Todirhamphus chloris</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 rights of local communities identified in HCV areas. All HCV areas are inside the HGU of PT Inti Indosawit Subur – Tungkal Ulu. HCV identified in Tungkal ulu Estate total 128.322 ha consist of: HCV 1.2 and 4.1: Benanak river 81.9 ha, Lampisi river 8.15 ha, Jitan river 4.48, Serayu river 5.54 ha, Beranak-1 small river 8.58 ha, Beranak-2 small river 7.32 ha, Serayu small river 3.04 ha, pool water reservoir area. HCV 6. Makam Panjang Datuk ratu 0.0025 ha, Kuburan Desa Lampisi-1 (Lampisi I Village Graveyard) 0.5 ha, Kuburan Desa lampisi-2 (Lampisi II Village Graveyard) 0.5 ha, Kuburan Desa Tanjung Beranak (Tanjung Beranak Village Grveyard) 2 ha, Kuburan Desa Bukit Harapan (Bukit Harapan Village Graveyard) 0.25 ha, Kuburan Desa Pinang Gading (Pinang Gading Village Graveyard) 2 ha. PT Inti Indosawit Subur – Tungkal Ulu has maintained the HCV area identified and give the access to the surrounding community to come to the graveyard and make a grave pilgrimage.	Complied
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	PT. Inti Indosawit Subur – Tungkal Ulu 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	Complied

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	<p>for the company is found to capture, harm, collect, trade, possess or kill these species.</p>	<p>refreshment to workers on 5 August 2019 and through regular master morning. 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> <p>Interview with workers regarding their understanding on RTE species protection will be conducted during onsite audit later.</p> <p>Smallholder:</p> <p>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, sample seen: socialization on 5 August 2019 and 23 January 2020 to all KUD at Plasma Office by Ari Azhari H (HCV Officer), attend by 33 participants from each KUD representative. Attendant list and minutes of training was available.</p> <p>During pandemic covid-19 year 2020 and 2021, the socialization activity was postponed to prevent the risk of covid-19 outbreak.</p> <p>Interview with smallholder member during field audit, confirmed that they have sufficient understanding on RTE species protection and HCV area.</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 – Tungkal Ulu Estate and Tungkal Ulu Plasma after November 2005. Currently, replanting activities still in progress. Original year of Planting</p>	Complied

		<p>for Tungkal Ulu Estate are 1990, 1991, 1993 and 2003. Wilst year of Planting for Tungkal Ulu Plasma are 1990, 1991, 1992, 1993 and 1994. Company has conducted HCV identification on 28 February – 11 March 2011 cooperation with “Fakultas Kehutanan Institut Pertanian Bogor”. Final report presented in “Laporan Final Kajian Penuh Identifikasi dan Analisis Keberadaan High Conservation Value di Areal PT. Inti Indosawit Subur – Tungkal Ulu Estate, Provinsi Jambi”.</p> <p>The Company has made a conservation management and monitoring plan to protect and conserve RTE species and monitor the presence of wildlife species and wildlife populations as well as protected plants/animal in and around the plantation.</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 – Tungkal Ulu Estate and Tungkal Ulu Plasma after November 2005. Currently, replanting activities still in progress. Original year of Planting for Tungkal Ulu Estate are 1990, 1991, 1993 and 2003. Wilst year of Planting for Tungkal Ulu Plasma are 1990, 1991, 1992, 1993 and 1994. Company has conducted HCV identification on 28 February – 11 March 2011 cooperation with “Fakultas Kehutanan Institut Pertanian Bogor”. Final report presented in “Laporan Final Kajian Penuh Identifikasi dan Analisis Keberadaan High Conservation Value di Areal PT. Inti Indosawit Subur – Tungkal Ulu Estate, Provinsi Jambi”.</p> <p>Therefore RaCP is not applicable.</p>	Complied

Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2020** and **2021** for **PT Inti Indosawit Subur – Tungkal Ulu 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 **2020** for **PT Inti Indosawit Subur – Tungkal Ulu POM** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	0.08
PKO	0.08

Extraction	%
OER	22.19
KER	5.29

Production	t/yr
FFB Process	79,868
CPO Produced	17,730
PKO Produced	4,228

Land Use	Ha
OP Planted Area	13,658
OP Planted on peat	-
Conservation (forested)	-
Conservation (non-forested)	124.07
Total	13,782.07

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	43,022.59	0.79	0	0	0	0	43,022.59	0
CO ₂ Emission from fertilizer	802.19	0.01	4,148.13	0.06	0	0	4,950.32	0.11
NO ₂ Emission	1,248.75	0.02	6,732.69	0.11	0	0	10,176.64	0.12
Fuel Consumption	1,355.06	0.02	459.95	0.01	0	0	3,283.46	0.04
Peat Oxidation	0	0	0	0	0	0	0	0
Sink								
Crop Sequestration	-40,779.71	-0.75	0	0	0	0	-40779.71	-0.75
Conservation Sequestration	0	0	0	0	0	0	0	0
Total	5,684.89	0.1	11,340.17	0.18	14,087	0	31,076.06	0.27

*Note: Includes both estates and Smallholder

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	4,278.86	0.02
Fuel Consumption	128.84	0
Grid Electricity Utilization	22.39	0
Credit		
Export of Grid Electricity	0	0
Sales of PKS	-29.803,40	-0.12
Sales of EFB	0	0
Total	-25,373.31	-0.09

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO ₂ e
PK from own mill	2,346.24
PK from other source	0
Fuel Consumptions	0
Total Crusher emissions	2.384.24

*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 (%)	0
Divert to methane captured (flaring) (%)	0
Divert to methane captured (energy generation) (%)	100

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The summary of the Net GHG emitted in **2021** for **PT Inti Indosawit Subur – Tungkal Ulu POM** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	0.20
PKO	0.20

Extraction	%
OER	20.26
KER	5.30

Production	t/yr
FFB Process	43,451.190
CPO Produced	9,529.625
PKO Produced	2,275.134

Land Use	Ha
OP Planted Area	13,658
OP Planted on peat	-
Conservation (forested)	-
Conservation (non-forested)	124.07
Total	13,782.07

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	0	0	0	0	0	0	0	0
CO ₂ Emission from fertilizer	2,111.69	0.03	7,879	0.08	0	0	9,990.69	0.11
NO ₂ Emission	3,443.64	0.05	6,733	0.07	0	0	10,176.64	0.12
Fuel Consumption	1,799.46	0.03	1,484	0.01	0	0	3,283.46	0.04
Peat Oxidation	0	0	0	0	0	0	0	0
Sink								
Crop Sequestration	0	0	0	0	0	0	0	0
Conservation Sequestration	0	0	0	0	0	0	0	0
Total	7,354.79	0.1	16,096	0.16	10,678	0	23,450.79	0.27

*Note: Includes both estates and Smallholder

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	4,125.19	0.01
Fuel Consumption	206.41	0
Grid Electricity Utilization	0	0
Credit		

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Export of Grid Electricity	0	0
Sales of PKS	-36,493.6	-0.12
Sales of EFB	0	0
Total	-32,162	-0.11

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO₂e
PK from own mill	393.2
PK from other source	0
Fuel Consumptions	0
Total Crusher emissions	393.2

*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 (%)	0
Divert to methane captured (flaring) (%)	0
Divert to methane captured (energy generation) (%)	100

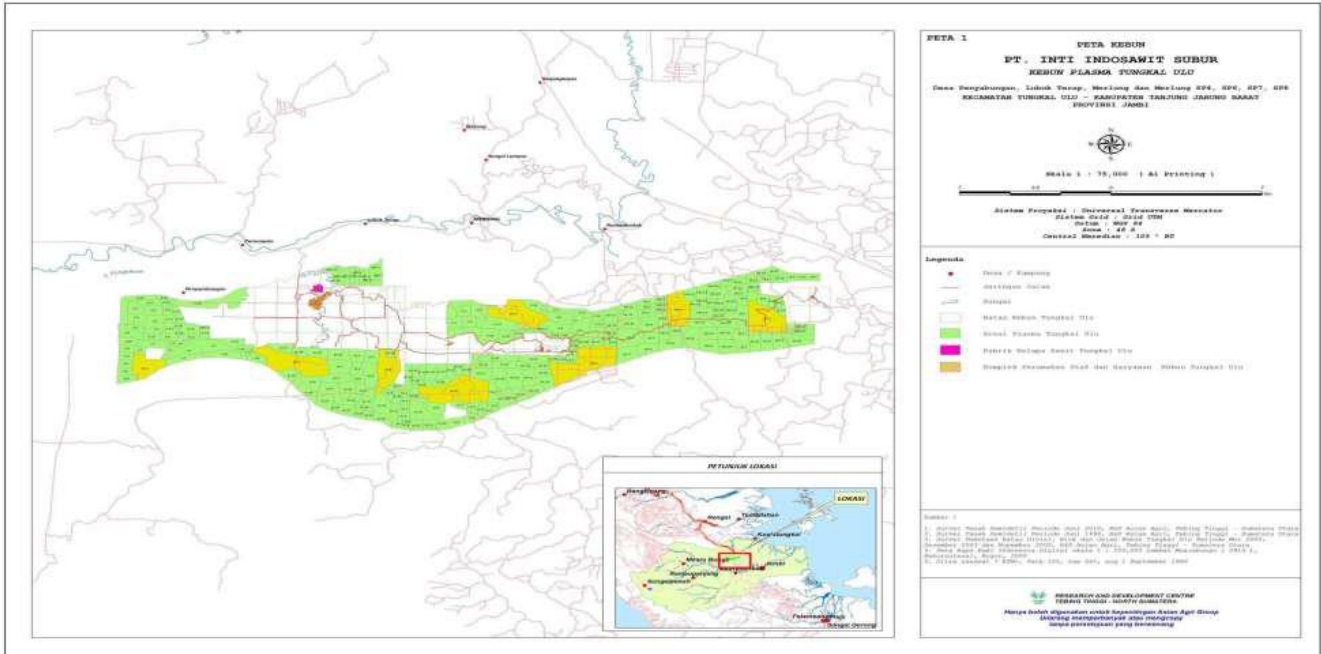
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Appendix C: Location Map of Certification Unit and Supply bases



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Appendix D: Estate Field Map



Appendix E: List of Smallholder Sampled

No	Name of farmer	Location	GPS Reference		Area Summary (Ha)		Forecasted annual FFB Production (MT)	Date of joining	Smallholder ID
			Latitude (N)	Longitude (E)	Total Certified Area	Planted Area			
KUD Sawit Kita									
1	Muhammad Solichin	Lampisi Village (SP-2), Renah Mendaluh District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°19' 01.50" S	102°56' 58.90" E	2	2	5.36	1990	43
2	Sarjono	Lampisi Village (SP-2), Renah Mendaluh District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°19' 01.50" S	102°56' 58.90" E	2	2	5.67	1990	5
3	Minah	Lampisi Village (SP-2), Renah Mendaluh District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°19' 01.50" S	102°56' 58.90" E	2	2	6.06	1990	73
4	Yahri	Lampisi Village (SP-2), Renah Mendaluh District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°19' 01.50" S	102°56' 58.90" E	2	2	4.65	1990	168
5	Sarjono	Lampisi Village (SP-2), Renah Mendaluh District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°19' 01.50" S	102°56' 58.90" E	2	2	4.39	1990	165
6	Khairul Amri	Lampisi Village (SP-2), Renah Mendaluh District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°19' 01.50" S	102°56' 58.90" E	2	2	2.68	1990	287
7	Tulus Bagariang (Santo)	Lampisi Village (SP-2), Renah Mendaluh District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°19' 01.50" S	102°56' 58.90" E	2	2	2.33	1990	186
8	Kabari	Lampisi Village (SP-2), Renah Mendaluh District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°19' 01.50" S	102°56' 58.90" E	2	2	4.99	1990	274
9	Masuri	Lampisi Village (SP-2), Renah Mendaluh District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°19' 01.50" S	102°56' 58.90" E	2	2	5.59	1990	412
10	Sipahutar	Lampisi Village (SP-2), Renah Mendaluh District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°19' 01.50" S	102°56' 58.90" E	2	2	4.43	1990	13

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No	Name of farmer	Location	GPS Reference		Area Summary (Ha)		Forecasted annual FFB Production (MT)	Date of joining	Smallholder ID
			Latitude (N)	Longitude (E)	Total Certified Area	Planted Area			
		Barat Regency, Jambi Province, Indonesia.							
11	Sadli	Lampisi Village (SP-2), Renah Mendaluh District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°19' 01.50" S	102°56' 58.90" E	2	2	4.71	1990	11
12	Paryono	Lampisi Village (SP-2), Renah Mendaluh District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°19' 01.50" S	102°56' 58.90" E	2	2	4.92	1990	447
13	Imam Muji	Lampisi Village (SP-2), Renah Mendaluh District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°19' 01.50" S	102°56' 58.90" E	2	2	6.13	1990	446
14	Sura Dikrama	Lampisi Village (SP-2), Renah Mendaluh District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°19' 01.50" S	102°56' 58.90" E	2	2	4.81	1990	210
15	Yuliwan	Lampisi Village (SP-2), Renah Mendaluh District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°19' 01.50" S	102°56' 58.90" E	2	2	4.06	1990	211
16	Mahdi	Lampisi Village (SP-2), Renah Mendaluh District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°19' 01.50" S	102°56' 58.90" E	2	2	6.43	1990	212
17	Rasikin	Lampisi Village (SP-2), Renah Mendaluh District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°19' 01.50" S	102°56' 58.90" E	2	2	4.70	1990	208
18	Maryono	Lampisi Village (SP-2), Renah Mendaluh District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°19' 01.50" S	102°56' 58.90" E	2	2	2.70	1990	421
19	Markito	Lampisi Village (SP-2), Renah Mendaluh District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°19' 01.50" S	102°56' 58.90" E	2	2	4.72	1990	423
20	Mardi	Lampisi Village (SP-2), Renah Mendaluh District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°19' 01.50" S	102°56' 58.90" E	2	2	2.90	1990	424
Subtotal					40	40	92.25		

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No	Name of farmer	Location	GPS Reference		Area Summary (Ha)		Forecasted annual FFB Production (MT)	Date of joining	Smallholder ID
			Latitude (N)	Longitude (E)	Total Certified Area	Planted Area			
KUD Karya Kita									
1	Katni	Tanjung Benanak Village (SP-3), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°20' 40.10" S	102°58' 16.30" E	2	2	9.20	1992	1021
2	Buyani	Tanjung Benanak Village (SP-3), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°20' 40.10" S	102°58' 16.30" E	2	2	9.73	1992	1022
3	Abdul Ngalim	Tanjung Benanak Village (SP-3), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°20' 40.10" S	102°58' 16.30" E	2	2	10.43	1992	1020
4	Ahmad Tentram	Tanjung Benanak Village (SP-3), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°20' 40.10" S	102°58' 16.30" E	2	2	7.45	1992	993
5	Sobirin	Tanjung Benanak Village (SP-3), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°20' 40.10" S	102°58' 16.30" E	2	2	10.38	1992	1002
6	Suparmin	Tanjung Benanak Village (SP-3), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°20' 40.10" S	102°58' 16.30" E	2	2	13.10	1992	1038
7	Suwardi	Tanjung Benanak Village (SP-3), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°20' 40.10" S	102°58' 16.30" E	2	2	12.50	1992	1041
8	Jumadi	Tanjung Benanak Village (SP-3), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°20' 40.10" S	102°58' 16.30" E	2	2	12.34	1992	1042
9	Zahrudin	Tanjung Benanak Village (SP-3), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°20' 40.10" S	102°58' 16.30" E	2	2	9.82	1992	1039
10	Armiyanto	Tanjung Benanak Village (SP-3), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°20' 40.10" S	102°58' 16.30" E	2	2	9.82	1992	1040
11	Edi	Tanjung Benanak Village (SP-3), Merlung District, Jambi Province, Indonesia.	01°20' 40.10" S	102°58' 16.30" E	2	2	12.57	1992	1068

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No	Name of farmer	Location	GPS Reference		Area Summary (Ha)		Forecasted annual FFB Production (MT)	Date of joining	Smallholder ID
			Latitude (N)	Longitude (E)	Total Certified Area	Planted Area			
		Tanjung Jabung Barat Regency, Jambi Province, Indonesia.							
12	Supriyadi	Tanjung Benanak Village (SP-3), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°20' 40.10" S	102°58' 16.30" E	2	2	15.51	1992	1066
13	Subur Radius	Tanjung Benanak Village (SP-3), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°20' 40.10" S	102°58' 16.30" E	2	2	14.92	1992	1072
14	Nidam	Tanjung Benanak Village (SP-3), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°20' 40.10" S	102°58' 16.30" E	2	2	15.44	1992	1063
15	Sriyono	Tanjung Benanak Village (SP-3), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°20' 40.10" S	102°58' 16.30" E	2	2	15.01	1992	1069
16	Saiful:	Tanjung Benanak Village (SP-3), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°20' 40.10" S	102°58' 16.30" E	2	2	10.39	1992	1085
17	Gunardi	Tanjung Benanak Village (SP-3), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°20' 40.10" S	102°58' 16.30" E	2	2	12.72	1992	1086
18	Dwi	Tanjung Benanak Village (SP-3), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°20' 40.10" S	102°58' 16.30" E	2	2	9.05	1992	1094
19	Sugianto	Tanjung Benanak Village (SP-3), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°20' 40.10" S	102°58' 16.30" E	2	2	12.50	1992	1078
20	Katmin	Tanjung Benanak Village (SP-3), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°20' 40.10" S	102°58' 16.30" E	2	2	11.00	1992	1090
Subtotal					40	40	233.87		
KUD Karya Jaya									
1	Bandiono	Bukit Harapan Village (SP-4), Merlung District, Tanjung Jabung Barat	01°20' 34.00" S	102°00' 35.40" E	2	2	5.84	1991	1404

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No	Name of farmer	Location	GPS Reference		Area Summary (Ha)		Forecasted annual FFB Production (MT)	Date of joining	Smallholder ID
			Latitude (N)	Longitude (E)	Total Certified Area	Planted Area			
		Regency, Jambi Province, Indonesia.							
2	Muhammad Kholil	Bukit Harapan Village (SP-4), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°20' 34.00" S	102°00' 35.40" E	2	2	5.93	1991	1367
3	Kuat Dirjoyo	Bukit Harapan Village (SP-4), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°20' 34.00" S	102°00' 35.40" E	2	2	6.13	1991	1362
4	Basuki	Bukit Harapan Village (SP-4), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°20' 34.00" S	102°00' 35.40" E	2	2	6.37	1991	1402
5	Sarito	Bukit Harapan Village (SP-4), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°20' 34.00" S	102°00' 35.40" E	2	2	6.46	1991	1400
6	Syawal	Bukit Harapan Village (SP-4), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°20' 34.00" S	102°00' 35.40" E	2	2	5.85	1991	1368
7	H. Sudarno	Bukit Harapan Village (SP-4), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°20' 34.00" S	102°00' 35.40" E	2	2	4.57	1991	1318
8	Suwito	Bukit Harapan Village (SP-4), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°20' 34.00" S	102°00' 35.40" E	2	2	4.43	1991	1371
9	Wiyono	Bukit Harapan Village (SP-4), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°20' 34.00" S	102°00' 35.40" E	2	2	4.47	1991	1410
10	Narko	Bukit Harapan Village (SP-4), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°20' 34.00" S	102°00' 35.40" E	2	2	4.53	1991	1335
11	Masidi	Bukit Harapan Village (SP-4), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°20' 34.00" S	102°00' 35.40" E	2	2	25.94	1991	1301

No	Name of farmer	Location	GPS Reference		Area Summary (Ha)		Forecasted annual FFB Production (MT)	Date of joining	Smallholder ID
			Latitude (N)	Longitude (E)	Total Certified Area	Planted Area			
12	Antonius Suratno	Bukit Harapan Village (SP-4), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°20' 34.00" S	102°00' 35.40" E	2	2	14.44	1991	1278
13	Tarno	Bukit Harapan Village (SP-4), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°20' 34.00" S	102°00' 35.40" E	2	2	14.85	1991	1315
14	Ahmad	Bukit Harapan Village (SP-4), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°20' 34.00" S	102°00' 35.40" E	2	2	16.58	1991	1257
15	Kliwon	Bukit Harapan Village (SP-4), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°20' 34.00" S	102°00' 35.40" E	2	2	10.12	1991	1276
16	Yuyu Sudiono	Bukit Harapan Village (SP-4), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°20' 34.00" S	102°00' 35.40" E	2	2	35.56	1992	1809
17	H. Ruhiyat	Bukit Harapan Village (SP-4), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°20' 34.00" S	102°00' 35.40" E	2	2	32.17	1992	1775
18	Sariyono	Bukit Harapan Village (SP-4), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°20' 34.00" S	102°00' 35.40" E	2	2	41.52	1992	1773
19	Rohmin	Bukit Harapan Village (SP-4), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°20' 34.00" S	102°00' 35.40" E	2	2	23.32	1992	1777
20	Pujiono	Bukit Harapan Village (SP-4), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°20' 34.00" S	102°00' 35.40" E	2	2	31.94	1992	1460
Subtotal					40	40	301.03		
KUD Panca Mukti									
1	Riyadi	Pinang Gading Village (SP-5), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°19' 09.80" S	103°04' 01.10" E	2	2	43.11	1991	3141

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No	Name of farmer	Location	GPS Reference		Area Summary (Ha)		Forecasted annual FFB Production (MT)	Date of joining	Smallholder ID
			Latitude (N)	Longitude (E)	Total Certified Area	Planted Area			
2	Hisam Subekti	Pinang Gading Village (SP-5), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°19' 09.80" S	103°04' 01.10" E	2	2	51.91	1991	3134
3	Suparman	Pinang Gading Village (SP-5), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°19' 09.80" S	103°04' 01.10" E	2	2	32.79	1991	3103
4	Tuslam	Pinang Gading Village (SP-5), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°19' 09.80" S	103°04' 01.10" E	2	2	52.82	1991	3110
5	Sugianto	Pinang Gading Village (SP-5), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°19' 09.80" S	103°04' 01.10" E	2	2	39.10	1991	3143
6	Sarwin	Pinang Gading Village (SP-5), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°19' 09.80" S	103°04' 01.10" E	2	2	50.97	1991	3113
7	Karisun	Pinang Gading Village (SP-5), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°19' 09.80" S	103°04' 01.10" E	2	2	33.32	1991	3096
8	Hasan	Pinang Gading Village (SP-5), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°19' 09.80" S	103°04' 01.10" E	2	2	51.21	1991	3130
9	Darmanto	Pinang Gading Village (SP-5), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°19' 09.80" S	103°04' 01.10" E	2	2	50.47	1991	3095
10	Eko	Pinang Gading Village (SP-5), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°19' 09.80" S	103°04' 01.10" E	2	2	39.74	1991	3094
11	Kardi	Pinang Gading Village (SP-5), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°19' 09.80" S	103°04' 01.10" E	2	2	37.11	1991	3070
12	Samul	Pinang Gading Village (SP-5), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°19' 09.80" S	103°04' 01.10" E	2	2	47.98	1991	3058

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No	Name of farmer	Location	GPS Reference		Area Summary (Ha)		Forecasted annual FFB Production (MT)	Date of joining	Smallholder ID
			Latitude (N)	Longitude (E)	Total Certified Area	Planted Area			
		Regency, Jambi Province, Indonesia.							
13	Hendri	Pinang Gading Village (SP-5), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°19' 09.80" S	103°04' 01.10" E	2	2	49.04	1991	3071
14	Andi	Pinang Gading Village (SP-5), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°19' 09.80" S	103°04' 01.10" E	2	2	36.98	1991	3069
15	Bahuddin	Pinang Gading Village (SP-5), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°19' 09.80" S	103°04' 01.10" E	2	2	52.75	1991	3053
16	Arifin	Pinang Gading Village (SP-5), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°19' 09.80" S	103°04' 01.10" E	2	2	52.97	1992	3050
17	Muhasim	Pinang Gading Village (SP-5), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°19' 09.80" S	103°04' 01.10" E	2	2	32.27	1992	3046
18	Agus	Pinang Gading Village (SP-5), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°19' 09.80" S	103°04' 01.10" E	2	2	37.85	1992	3102
19	Edi Mulyono	Pinang Gading Village (SP-5), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°19' 09.80" S	103°04' 01.10" E	2	2	35.26	1992	3049
20	Zulbaidi	Pinang Gading Village (SP-5), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°19' 09.80" S	103°04' 01.10" E	2	2	50.08	1992	3052
Subtotal					40	40	877.74		
KUD Sari Bumi									
1	M. Sulton	Adipurwa Village (SP-6), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°21' 50.40" S	103°02' 39.30" E	2	2	50.71	1991	2030
2	Hermanto	Adipurwa Village (SP-6), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°21' 50.40" S	103°02' 39.30" E	2	2	42.90	1991	2087

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No	Name of farmer	Location	GPS Reference		Area Summary (Ha)		Forecasted annual FFB Production (MT)	Date of joining	Smallholder ID
			Latitude (N)	Longitude (E)	Total Certified Area	Planted Area			
		Regency, Jambi Province, Indonesia.							
3	Saturi	Adipurwa Village (SP-6), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°21' 50.40" S	103°02' 39.30" E	2	2	39.84	1991	2062
4	Khoirul Uspan	Adipurwa Village (SP-6), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°21' 50.40" S	103°02' 39.30" E	2	2	33.83	1991	2060
5	Jumari	Adipurwa Village (SP-6), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°21' 50.40" S	103°02' 39.30" E	2	2	43.41	1991	2022
6	Sularno	Adipurwa Village (SP-6), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°21' 50.40" S	103°02' 39.30" E	2	2	42,12	1991	2019
7	Wagito	Adipurwa Village (SP-6), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°21' 50.40" S	103°02' 39.30" E	2	2	47.48	1991	2025
8	Suliyanto	Adipurwa Village (SP-6), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°21' 50.40" S	103°02' 39.30" E	2	2	31.33	1991	2010
9	Heri Suyoto	Adipurwa Village (SP-6), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°21' 50.40" S	103°02' 39.30" E	2	2	33.08	1991	2012
10	Shodikun	Adipurwa Village (SP-6), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°21' 50.40" S	103°02' 39.30" E	2	2	31.46	1991	2011
11	Indahono	Adipurwa Village (SP-6), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°21' 50.40" S	103°02' 39.30" E	2	2	39.01	1991	2027
12	Dwi Miswanto	Adipurwa Village (SP-6), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°21' 50.40" S	103°02' 39.30" E	2	2	39.81	1991	2021

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No	Name of farmer	Location	GPS Reference		Area Summary (Ha)		Forecasted annual FFB Production (MT)	Date of joining	Smallholder ID
			Latitude (N)	Longitude (E)	Total Certified Area	Planted Area			
13	Tukimin	Adipurwa Village (SP-6), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°21' 50.40" S	103°02' 39.30" E	2	2	37.10	1991	1994
14	Wijiono	Adipurwa Village (SP-6), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°21' 50.40" S	103°02' 39.30" E	2	2	41.56	1991	1970
15	Marsudi	Adipurwa Village (SP-6), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°21' 50.40" S	103°02' 39.30" E	2	2	49.50	1991	1734
16	Margono	Adipurwa Village (SP-6), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°21' 50.40" S	103°02' 39.30" E	2	2	37.96	1991	1710
17	Sutarno	Adipurwa Village (SP-6), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°21' 50.40" S	103°02' 39.30" E	2	2	36.74	1991	1708
18	Ngatimin	Adipurwa Village (SP-6), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°21' 50.40" S	103°02' 39.30" E	2	2	34.21	1991	1707
19	Umar	Adipurwa Village (SP-6), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°21' 50.40" S	103°02' 39.30" E	2	2	33.32	1991	1732
20	Sunar	Adipurwa Village (SP-6), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°21' 50.40" S	103°02' 39.30" E	2	2	47.37	1991	1769
Subtotal					40	40	792.76		
KUD Sawit Mulia									
1	Santoso	Intan Jaya Village (SP-7), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°20' 36.00" S	103°05' 38.90" E	2	2	40.89	1993	3569
2	Marlan	Intan Jaya Village (SP-7), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°20' 36.00" S	103°05' 38.90" E	2	2	31.95	1993	3565

No	Name of farmer	Location	GPS Reference		Area Summary (Ha)		Forecasted annual FFB Production (MT)	Date of joining	Smallholder ID
			Latitude (N)	Longitude (E)	Total Certified Area	Planted Area			
3	Wiyarno	Intan Jaya Village (SP-7), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°20' 36.00" S	103°05' 38.90" E	2	2	38.96	1993	3513
4	Sugianto	Intan Jaya Village (SP-7), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°20' 36.00" S	103°05' 38.90" E	2	2	42.93	1993	3514
5	M . Jakfar	Intan Jaya Village (SP-7), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°20' 36.00" S	103°05' 38.90" E	2	2	45.90	1993	3548
6	Mulyono	Intan Jaya Village (SP-7), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°20' 36.00" S	103°05' 38.90" E	2	2	49.06	1993	3657
7	Sudirno	Intan Jaya Village (SP-7), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°20' 36.00" S	103°05' 38.90" E	2	2	41.38	1993	3620
8	Andi	Intan Jaya Village (SP-7), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°20' 36.00" S	103°05' 38.90" E	2	2	52.38	1993	3659
9	Sukoyo	Intan Jaya Village (SP-7), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°20' 36.00" S	103°05' 38.90" E	2	2	37.20	1993	3604
10	Eko Prasetyo	Intan Jaya Village (SP-7), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°20' 36.00" S	103°05' 38.90" E	2	2	47.05	1993	3603
11	Aris	Intan Jaya Village (SP-7), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°20' 36.00" S	103°05' 38.90" E	2	2	39.63	1993	3649
12	Munali	Intan Jaya Village (SP-7), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°20' 36.00" S	103°05' 38.90" E	2	2	49.00	1993	3596
13	Mansur	Intan Jaya Village (SP-7), Merlung District, Tanjung Jabung Barat	01°20' 36.00" S	103°05' 38.90" E	2	2	35.55	1993	3629

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			Latitude (N)	Longitude (E)	Total Certified Area	Planted Area			
		Regency, Jambi Province, Indonesia.							
14	Juwanto(Sofyan)	Intan Jaya Village (SP-7), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°20' 36.00" S	103°05' 38.90" E	2	2	43.86	1993	3630
15	Ridiawan	Intan Jaya Village (SP-7), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°20' 36.00" S	103°05' 38.90" E	2	2	41.75	1993	3648
16	Komar	Intan Jaya Village (SP-7), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°20' 36.00" S	103°05' 38.90" E	2	2	47.17	1993	3627
17	Barnizal (Satrin)	Intan Jaya Village (SP-7), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°20' 36.00" S	103°05' 38.90" E	2	2	41.90	1993	3766
18	Juwanto	Intan Jaya Village (SP-7), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°20' 36.00" S	103°05' 38.90" E	2	2	43.93	1993	3690
19	Saidun	Intan Jaya Village (SP-7), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°20' 36.00" S	103°05' 38.90" E	2	2	39.08	1993	3767
20	Dedi Kurnia	Intan Jaya Village (SP-7), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°20' 36.00" S	103°05' 38.90" E	2	2	42.99	1993	3691
21	Poniman (Rohadi)	Intan Jaya Village (SP-7), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°20' 36.00" S	103°05' 38.90" E	2	2	33.14	1993	3700
22	H. Zainal	Intan Jaya Village (SP-7), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia.	01°20' 36.00" S	103°05' 38.90" E	2	2	50.73	1993	3702
Subtotal					44	44	936.41		
Total					244	244	3,234.06		

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