

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

- Initial Assessment**
- Annual Surveillance Assessment (2_2)**
- Recertification Assessment (Choose an item.)**
- Extension of Scope**

Client Company name (Parent Company): SIPEF Group
Client company Address: Kasteel Calesberg – Calesbergdreef 5, B-2900 Schoten – Belgium
Certification Unit: PT Tolan Tiga Indonesia – Perlabian Palm Oil Mill
Location of Certification Unit: Perkebunan Perlabian Village, Kampung Rakyat District, Labuhanbatu Selatan Regency, Sumatera Utara Province- 21463, Indonesia
Date of Final Report: 30/04/2022

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Section 1: Scope of the Assessment

1. Company Details			
Parent Company	SIPEF Group		
RSPO Membership Number	1-0021-05-000-00	Membership Approval Date	7/12/2005
Address	Kasteel Calesberg – Calesbergdreef 5, B-2900 Schoten – Belgium		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	PT. Tolan Tiga Indonesia – Perlabian Palm Oil Mill		
Location / Address	Perkebunan Perlabian Village, Kampung Rakyat District, Labuhanbatu Selatan Regency, Sumatera Utara Province 21463, Indonesia		
Website	www.tolantiga.co.id		
Management Representative	Mr. Sander Van Den Ende	E-mail	svdenende@sipef.com
Telephone	+6261 – 41060020	Facsimile	+6261 - 4520908

2. Certification Information			
Certificate Number	RSPO 555208	Certificate Start Date	17/05/2020
Date of First Certification	17/05/2010	Certificate Expiry Date	16/05/2025
Scope of Certification	Production of Palm Oil and Palm Kernel		
Visit Objectives	<ul style="list-style-type: none"> • Determination of the conformity of the client's management system, or parts of it, with audit criteria. • Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements. 		
Assessment Cycle	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 2_2) <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 checked="" type="checkbox"/> Identity Preserved; <input type="checkbox"/> Mass Balance	Mill Capacity	60 Mt/Hr
ISH certification Phase	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		

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3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
EU-ISCC-Cert-ID230-20210005	ISCC	PT SBS Asia Sertifikasi	03-12-2022
ISPO 611404	ISPO	PT. BSI Group Indonesia	18-07-2026
00053944	ISO 9001:2015	PT. Lloyd's Register Indonesia	02-07-2024

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Perlabian POM	Perkebunan Perlabian Village, Kampung Rakyat District, Labuhanbatu Selatan Regency, Sumatera Utara Province – 21463, Indonesia	2° 3' 40.98" N	100° 4' 57.19" E
Perlabian Estate	Perkebunan Perlabian Village, Kampung Rakyat District, Labuhanbatu Selatan Regency, Sumatera Utara Province – 21463, Indonesia	2° 3' 37.60" N	100° 4' 52.40" E
Tolan Estate	Perkebunan Perlabian Village, Kampung Rakyat District, Labuhanbatu Selatan Regency, Sumatera Utara Province – 21463, Indonesia	2° 0' 7.60" N	100° 2' 30.85" E

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
Perlabian Estate	4,216.69	85.12	505.21	4,807.02	87.40
Tolan Estate	3,614.15	55.99	1.90	3,672.04	98.42
Total	7,830.84	141.11	507.11	8,479.06	92.91

6. Plantings & Cycle							
Estate / Smallholders	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Perlabian Estate	378.74	1,832.8	1,409.14	41.80	554.21	4,039.84	176.85
Tolan Estate	0	124.12	1,413.79	1,573.34	502.90	3,614.15	0
Total (ha)	493.39	1,831.82	3,002.94	1,573.34	914.13	7,495.58	320.04

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7. Summary of Certified Tonnage of FFB (Own Certified Scope)				
Estate / Smallholders	Tonnage / year			
	Estimated last year (May 2021 – Apr 2022)	Actual (Mar 2021 – Feb 2022)		Forecast (May 2022 – Apr 2023)
		Previous license period (Mar-Apr 2021)	Current license period (May 2021 – Feb 2022)	
Perlabian Estate	117,991	16,376.09	73,842.62	117,809
Tolan Estate	114,827	14,680.23	70,539.85	105,972
Total	232,818	175,438.79		223,781

8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate / Smallholders	Tonnage / year			
	Estimated last year (May 2021 – Apr 2022)	Actual (Mar 2021 – Feb 2022)		Forecast (May 2022 – Apr 2023)
		Previous license period (Mar-Apr 2021)	Current license period (May 2021 – Feb 2022)	
-	-	-	-	-
-	-	-	-	-
Total	-	-	-	-

9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage / year			
	Estimated last year (May 2021 – Apr 2022)	Actual (Mar 2021 – Feb 2022)		Forecast (May 2022 – Apr 2023)
		Previous license period (Mar-Apr 2021)	Current license period (May 2021 – Feb 2022)	
-	-	-	-	-
-	-	-	-	-
Total	-	-	-	-

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	Mar 2021	15,792.99	-	15,792.99
2	Apr 2021	15,263.33	-	15,263.33

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3	May 2021	14,188.78	-	14,188.78
4	Jun 2021	16,348.71	-	16,348.71
5	Jul 2021	17,283.60	-	17,283.60
6	Aug 2021	18,230.46	-	18,230.46
7	Sep 2021	16,340.10	-	16,340.10
8	Oct 2021	13,338.66	-	13,338.66
9	Nov 2021	14,633.79	-	14,633.79
10	Dec 2021	12,179.72	-	12,179.72
11	Jan 2022	11,406.41	-	11,406.41
12	Feb 2022	10,432.24	-	10,432.24
TOTAL		175,438.79		175,438.79

10. Summary of Certified Tonnage (not applicable for ISS)			
Estimated last year (May 2021 – Apr 2022)	Actual (Mar 2021 – Feb 2022)		Forecast (May 2022 – Apr 2023)
	Previous license period (Mar-Apr 2021)	Current license period (May2021 – Feb2022)	
FFB	FFB		FFB
232,818 mt	31,056.32 mt	144,382.47 mt	223,781 mt
	175,438.79 mt		
CPO (OER: 23.99 %)	CPO (OER: 22.16 %)		CPO (OER: 24%)
55,876 mt	6,881.39 mt	31,928.36 mt	53,707 mt
	38,809.75 mt		
PK (KER: 5.50 %)	PK (KER: 5.75 %)		PK (KER: 5.5%)
12,805 mt	1,809.75 mt	8,203.27 mt	12,308 mt
	10,013.02 mt		

10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1	Mar 2021	3,471.90	937.08
2	Apr 2021	3,409.49	872.67
3	May 2021	3,118.33	800.44
4	Jun 2021	3,639.92	902.95
5	Jul 2021	3,760.72	934.46
6	Aug 2021	3,921.45	1,078.83
7	Sep 2021	3,618.70	949.34

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8	Oct 2021	3,058.00	761.72
9	Nov 2021	3,210.20	860.82
10	Dec 2021	2,817.20	724.28
11	Jan 2022	2,467.42	627.27
12	Feb 2022	2,316.42	563.16
TOTAL		38,809.75	10,013.02

11. Summary of Actual Volume sold					
Current License period (May2021 – Feb2022)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	0	30,052.53	0	1.20	30,053.73
PK (MT)	7,811.34	0	0	0	7,811.34
Credits	-	-	-	-	-
Previous License period (Mar-Apr2021)					
CPO (MT)	0	6,413.38	0	0.14	6,413.52
PK (MT)	1,767.01	0	0	0	1,767.01
Credits	-	-	-	-	-

11A. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any)				
No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
1	PT. S	TR-1bd21178-c01b	0	20.11
2	PT.I	TR-be58c4a4-ef2f	0	120.13
3	PT. S	TR-0af0ecde-0c7d	0	500.00
4	PT. S	TR-2e344f6d-7515	0	200.00
5	PT. I	TR-01725cf4-f0e5	0	475.00
6	PT. S	TR-c2f35395-f4c2	0	451.77
7	PT. I	TR-2721a7ba-26a4	0	23.23
8	PT. I	TR-bf13c6ef-60d7	0	392.14
9	PT. S	TR-481eed6e-6116	0	395.54
10	PT. S	TR-9a90a401-9cfd	0	7.86
11	PT. I	TR-a5bee7e0-9cb2	0	4.46
12	PT. S	TR-d617c0eb-41f5	0	385.93
13	PT. S	TR-d8dea3a4-a57f	0	355.82

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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)
14	PT. I	TR-79d40d01-4c68	0	64.07
15	PT. S	TR-75084325-c132	0	94.18
16	PT. I	TR-2ee0b3c6-5b9a	0	456.31
17	PT. S	TR-74903395-1682	0	409.35
18	PT. I	TR-31c022f5-6c46	0	143.69
19	PT. S	TR-def3fdec-7ef9	0	190.65
20	PT. I	TR-0dcaa6ef-944f	0	349.12
21	PT. S	TR-95203e8b-75c0	0	372.76
22	PT. I	TR-40e999c6-c46b	0	75.88
23	PT.S	TR-233dee7c-e3dc	0	52.24
24	PT. I	TR-c3d66798-cbe0	0	303.80
25	PT.S	TR-f3798300-e23c	0	489.66
26	PT. I	TR-a65ea807-bd40	0	196.20
27	PT. S	TR-ad2d91e4-e859	0	10.34
28	PT. I	TR-dab58659-9865	0	326.94
29	PT. I	TR-4250df3e-ec35	0	300.00
30	PT.I	TR-9afea9fb-2e85	0	290.82
31	PT. S	TR-244ba566-cd52	0	300.00
32	PT. S	TR-a0652cb4-e060	0	172.94
33	PT. S	TR-a7aaec3e-f1a1	0	227.06
34	PT. S	TR-3539b28e-7ad9	0	179.29
35	PT. I	TR-7717aa29-6a92	0	184.75
36	PT. I	TR-2acb9e31-93f5	0	257.17
37	PT.I	TR-c438c9f1-0b63	0	2.95
38	PT. I	TR-30ac1aec-6f5d	0	51.04
39	PT. S	TR-40054780-31fb	0	142.83
40	PT.S	TR-1bd21178-c01b	0	602.32
TOTAL			0	9,578.35

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	PT. I	ISCC	333.96	0

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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)
2	PT. I	ISCC	2,448.38	0
3	PT. I	ISCC	47.02	0
4	PT. I	ISCC	998.10	0
5	PT. I	ISCC	486.71	0
6	PT. I	ISCC	486.39	0
7	PT. I	ISCC	364.82	0
8	PT. I	ISCC	1,248.00	0
9	PT. I	ISCC	12.43	0
10	PT. I	ISCC	12.67	0
11	PT. I	ISCC	134.16	0
12	PT. I	ISCC	901.26	0
13	PT. I	ISCC	475.11	0
14	PT. I	ISCC	499.18	0
15	PT. I	ISCC	499.27	0
16	PT. I	ISCC	97.24	0
17	PT. I	ISCC	24.21	0
18	PT. I	ISCC	499.32	0
19	PT. I	ISCC	798.30	0
20	PT. I	ISCC	499.11	0
21	PT. I	ISCC	1,979.94	0
22	PT. I	ISCC	200.48	0
23	PT. I	ISCC	17.53	0
24	PT. I	ISCC	487.57	0
25	PT. I	ISCC	408.48	0
26	PT. I	ISCC	151.06	0
27	PT. I	ISCC	2,637.47	0
28	PT. I	ISCC	11.46	0
29	PT. I	ISCC	90.62	0
30	PT. I	ISCC	348.31	0
31	PT. I	ISCC	109.49	0
32	PT. I	ISCC	499.34	0
33	PT. I	ISCC	491.78	0
34	PT. I	ISCC	249.71	0

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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)
35	PT. I	ISCC	1,535.49	0
36	PT. I	ISCC	7.59	0
37	PT. I	ISCC	249.73	0
38	PT. I	ISCC	1,461.39	0
39	PT. I	ISCC	499.88	0
40	PT. I	ISCC	499.50	0
41	PT. I	ISCC	998.46	0
42	PT. I	ISCC	826.19	0
43	PT. I	ISCC	173.05	0
44	PT. I	ISCC	2,890.91	0
45	PT. I	ISCC	1,601.39	0
46	PT. I	ISCC	1,850.97	0
47	PT. I	ISCC	644.75	0
48	PT. I	ISCC	1,970.37	0
49	PT. I	ISCC	526.27	0
50	PT. I	ISCC	2,181.09	0
TOTAL			36,465.91	0

11C. Records of CPO & PK Sold as conventional since the last audit (if any)			
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)
1	Claim Transporter	0.08	0
2	Claim Transporter	0.03	0
3	Claim Transporter	0.03	0
4	Claim Transporter	0.02	0
5	Claim Transporter	0.03	0
6	Claim Transporter	0.13	0
7	Claim Transporter	0.05	0
8	Claim Transporter	0.07	0
9	Claim Transporter	0.01	0
10	Claim Transporter	0.05	0
11	Claim Transporter	0.26	0
12	Claim Transporter	0.06	0

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11C. Records of CPO & PK Sold as conventional since the last audit (if any)			
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)
13	Claim Transporter	0.20	0
14	Claim Transporter	0.01	0
15	Claim Transporter	0.04	0
16	Claim Transporter	0.12	0
17	Claim Transporter	0.02	0
18	Claim Transporter	0.09	0
19	Claim Transporter	0.04	0
TOTAL		1.34	0

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			N/A

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

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

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 **8-10 March 2022**. The audit programme is included as Section 2.3.

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

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. Indonesia National Interpretation 2020 of the RSPO P&C 201 was used as the normative reference to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

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

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

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

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

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

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

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

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Re-Certification)	Year 2 (ASA 2_1)	Year 3 (ASA 2_2)	Year 4 (ASA 2_3)	Year 5 (ASA 2_4)
Perlabian POM	X	X	X	X	X
Perlabian Estate	X	X	X	X	X
Tolan Estate	X	X	X	X	X

Tentative Date of Next Visit: March 1, 2023 - March 3, 2023

Total Number of Mandays: 12.5

2.2 BSI Assessment Team

Name	Role	Competency
Yudwi Wisnu Rahmanto (YWR)	Team Leader	<p>Education: Holds a Bachelor of Forestry with Silviculture background.</p> <p>Work Experience: 7 months working experience in palm oil industry as Agronomy Field Assistant. 11 years working experience as sustainability auditor covering Sustainable Forest Management by FSC FM/COC Scheme, RSPO, ISPO, Coffee And Farmer Equity (C.A.F.E Practices) Starbucks, Organic Standard (EU, NOP, JAS) for Coffee Farmers and Organic Exchange for Textile</p> <p>Training attended: Completed Endorsed RSPO P&C Lead Auditor Training Course, RSPO NEXT, ISPO Auditor/Lead Auditor Course, RSPO P&C Social and Labour Standards and the Mechanics of Social Auditing Training, SMETA Requirements Training, ISO 9001:2008 Auditor/Lead Auditor Course, GIS-Basic Mapping and Spatial Analysis, Timber Legality Assurance System (SVLK), Verification Organization Training C.A.F.E Practices (Starbucks), UTZ Programme, High Conservation Value (HCV) Training, Sustainability Reporting Assurance Training, Introductory Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation, RSPO ISH Standard Training Course and Endorsed RSPO Supply Chain Lead Auditor Training Course.</p> <p>Aspect covered in this audit: Social aspect and stakeholder consultation</p> <p>Language proficiency: Fluent in Bahasa Indonesia and English</p>
Eko Purwanto (EP)	Team Member	<p>Education: Holds a Bachelor of Forestry from Forest Conservation Department, Faculty of Forestry, Bogor Institute of Agriculture (IPB).</p> <p>Work Experience: Over 9 year working expiring in oil palm plantation with last position as Estate Manager. He has experience in implementing good agricultural practice including integrated pest management and limited pesticides uses. 10 years working experience auditor since 2012 covering ISO9001, RSPO and ISPO.</p>

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		<p>Training attended: Completed SMETA Requirements Training, ISPO Permentan 38/2020, Introductory Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation, CQI and IRCA Certified ISO 45001:2018 Lead Auditor Training Course, ISO 37001:2016 Anti-bribery Management System Implementing Training Course, RSPO P&C 2018 Refresher Training, Sustainability Reporting Assurance Training, RSPO P&C Lead Auditor Refresher Course, RSPO Supply Chain Certification Refresher Course, RSPO NEXT Training Course For Lead Auditor by RSPO Secretariat, Elaborating on the RSPO P&C Social and Labour Standards and the Mechanics of Social Auditing, RABQSA accredited Lead Auditor Training of Environment Management System, Endorsed RSPO Green House Gas (GHG) Training for Trainer, Endorsed RSPO P&C Lead Auditor Training, Understanding Environmental Management System (EMS), Indonesia Sustainable Palm Oil (ISPO) Lead Auditor Training, Endorsed RSPO Supply Chain Certification (SCC) Lead Auditor Training, RABQSA accredited Lead Auditor Training of Quality Management System.</p> <p>Aspect covered in this audit: During this assessment, he assessed on the aspects of mill and estate best management practices and supply chain for CPO mills.</p> <p>Language proficiency: Fluent in Bahasa Indonesia and English</p>
<p>Andi Pratama Pasaribu (AP)</p>	<p>Team Member</p>	<p>Education: Holds a Bachelor Degree majoring Social Economy from Jember University</p> <p>Work Experience: 5 years working experience as Field Agronomy Assistant. 8 years working experience as RSPO Auditor / Lead Auditor.</p> <p>Training attended: Completed Indonesian Sustainable Palm Oil (ISPO) Lead Auditor training, Endorsed RSPO P&C Lead Auditor course, Introductory Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation, ISO 9001:2008 Lead Auditor course, ISO 14001:2005 Lead Auditor course, ISO45001:2018 Lead Auditor Course, RSPO endorsed RSPO SCCS Lead Auditor course, SMETA requirements training</p> <p>Aspect covered in this audit: During this assessment, he assessed legal, HCV and social worker aspect.</p> <p>Language proficiency: Fluent in Bahasa Indonesia and English</p>
<p>Imam Fakhurozi (IF)</p>	<p>Team Member</p>	<p>Education: Holds a Bachelor Degree majoring in Agriculture Technology from Gadjah Mada University.</p> <p>Work Experience: 2 years working experience oil palm industry, as a sustainability and HSE officer. 7 years working experience as RSPO Auditor / Lead Auditor</p> <p>Training attended: Completed ISO 9001:2008 Lead Auditor Course, 14001:2004 Lead Auditor Course, SMK3 Lead Auditor Course, Endorsed RSPO P&C Lead auditor course, ISO 45001:2018 Lead Auditor Course, SMETAR requirements training, Introductory Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation</p> <p>Aspect covered in this audit: Occupational Health and Safety, Environmental Aspect, GHG and Manpower.</p> <p>Language proficiency: Fluent in Bahasa Indonesia and English</p>

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Accompanying Persons:

Name	Role
Pratama A. Sedayu (PS)	Qualifying Reviewer

1.3 Assessment Plan

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

Date	Time	Subjects	EP	APP	IF	YWR	PS
Monday, 07/03/2022	07.00 – 09.30	Flight Jakarta to Kualanamu	√	√	√	√	√
	09.30 – 17.00	Traveling (Kualanamu airport to Perlavian POM)	√	√	√	√	√
Tuesday, 08/03/2022	08.00 – 09.00	Opening Meeting: - 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)	√	√	√	√	√
	09.00 – 12.00	Field visit to Perlavian POM to verify: • Best Management Practice for Mill Processing and Supply Chain Element for Palm Oil Mill • Site visit to check on FFB receiving, FFB process, CPO and PK dispatch, document and record keeping.	√				
		• Interview with workers related to human resource management, health and safety condition, training provision, worker right and condition, code of ethical conduct, respect human rights, freedom of association, etc. • Visit to workers facilities: house condition, water supplies, sanitation, access to affordable food, welfare amenities.		√			
		• Implementation of OHS (loading ramp, workshop, boiler, turbine, diesel bowser, material warehouse, firefighting equipment). • Implementation of Environmental and Waste Management Aspect (POME Pond, Empty Bunch Area, Reservoir/Intake Point, Biogas Plant)			√		
		- Stakeholder Consultation with interested and affected parties of relevant agencies of Labuhanbatu Selatan Regency by phone . - Stakeholder Consultation with Worker Union, Gender Committee, Contractor and Local NGO (if any).					√
	12.00 – 14.00	Lunch Break	√	√	√	√	√
	14.00 – 16.30	Continue Morning Agenda - Review support to smallholder inclusion/support independent smallholder.		√			

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Date	Time	Subjects	EP	APP	IF	YWR	PS	
		Continue Morning Agenda - Review information related to RSPO SCCS for Perlabian POM.	√					
		Continue Morning Agenda - Review information related to legal, consultation and communication for Perlabian POM				√	√	
		Continue Morning Agenda - Review information related to OHS and EMS for Perlabian POM			√			
	16.30 – 17.00	Wrap up meeting	√	√	√	√	√	
Wednesday, 09/03/2022	08.00 – 12.00	Field Visit to Tolan Estate Aspect to be verified:						
		• Implementation of Legal aspect (boundaries, occupied land, disputes – if any) and HCV management area.		√				
		• Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application)	√					
		• Implementation of Environmental and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management)			√			
	• Visit to Tolan Estate housing complex: house condition, water supplies, sanitation, access to affordable food, welfare amenities, clinic, school, landfill, social amenities. Interview with Gender committee, worker union and new mother (if any)					√	√	
	12.00 – 14.00	Lunch Break	√	√	√	√	√	
	14.00 – 16.30	Continue Morning Agenda	• Review information related to Policy and commitment, smallholder welfare, FFB suppliers, social requirements, contract agreement, human rights, workers' welfare, stakeholder consultation, GHG mitigation		√			
		Continue Morning Agenda	• Review information related to Economic management plan, Estate best management practices, IPM;	√				
		Continue Morning Agenda	• Review information related to Stakeholder Consultation and Communication, Legal Requirements, Land & Legal issue, Conflict resolution;				√	√
		Continue Morning Agenda	• Review information related to OHS Management System, EIA and Environmental MS, Training, HCV, Natural and biodiversity conservation, waste management;			√		

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Date	Time	Subjects	EP	APP	IF	YWR	PS	
	16.30 – 17.00	Wrap up meeting	√	√	√	√		
Thursday, 10/03/2022	08.00 – 12.00	Field Visit to Perlabian Estate Aspect to be verified: Implementation of Legal aspect (boundaries, occupied land, disputes – if any) and HCV management area.		√				
		Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application)	√					
		Implementation of Environmental and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management)			√			
		Visit to Perlabian Estate housing complex: house condition, water supplies, sanitation, access to affordable food, welfare amenities, clinic, school, landfill, social amenities. Interview with Gender committee, worker union and new mother (if any)				√	√	
	12.00 – 14.00	Lunch Break	√	√	√	√		
	14.00 – 16.30	Continue Morning Agenda Review information related to Policy and commitment, smallholder welfare, FFB suppliers, social requirements, contract agreement, human rights, workers’ welfare, stakeholder consultation, GHG mitigation			√			
		Continue Morning Agenda Review information related to Economic management plan, Estate best management practices, IPM;	√					
		Continue Morning Agenda Review information related to Stakeholder Consultation and Communication, Legal Requirements, Land & Legal issue, Conflict resolution;				√	√	
		Continue Morning Agenda Review information related to OHS Management System, EIA and Environmental MS, Training, HCV, Natural and biodiversity conservation, waste management;			√			
	16.30 – 17.00	Report preparation	√	√	√	√	√	
17.00 – 17.30	Closing Meeting <ul style="list-style-type: none"> • Presentation of audit findings (Noteworthy Positive Component, Non-Conformities, OFI, Timeline of CAR’s, Conclusion). • Comments, Responses and Questions. 	√	√	√	√	√		

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?	The time bound plan has included all the subsidiary and group of companies of SIPEF Group. The TBP was verified against the Group Member information published in the RSPO website under the parent company SIPEF.	Complied.
Have all the estates and mills certified within five (5) years after obtaining RSPO membership?	There are estates and mills that are not certified within 5 years of the RSPO membership. But, since this requirement was published in July 2017, the 5 years starts from 2017 in which the SIPEF have up to 2022 to comply with this requirement. Despite the above, SIPEF had demonstrated that those units/estates that are not able to be certified are either due to awaiting for the HGU (Hak Guna Usaha <i>Right to Cultivate</i>) and/or awaiting for full estate development.	Complied
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available.	PT. Asri Rimba Wirabhakti (ARWB) in Bengkulu Province was acquired by SIPEF in end of 2018 with Sei Teramang Estate attached to the acquisition. Sei Teramang was supposed to be audited during the recertification audit of PT Agro Muko – Bunga Tanjung Palm Oil Mill. However, due to technical glitch at RSPO where the liabilities cannot yet be confirmed, the certification audit for Sei Teramang Estate has to be postponed and audited as extension of scope to the current PT Agro Muko – Bunga Tanjung Palm Oil Mill supply base. The estimated time to audit will be end 2021 / 2022 depending of the results of the liability check by RSPO Secretariat. As updated information, Sei Teramang Estate scheduled to be audited in end of March 2022.	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	So far, the deviations periods are acceptable and justifiable. There was no deliberate delay by the company.	Complied
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?	The commitment timeline has postponed from 2024 to 2025. The changes are acceptable as the control of being certified is not on the hands of the Company due to awaiting for HGU which the approval is beyond the company choice.	Complied

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<p>Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised</p>	<p>All lapses of implanting the original plan are justified base on the awaiting for the HGU (Hak Guna Usaha <i>Right to Cultivate</i>) and/or awaiting for full estate development. While for the newly acquired estate, it is justified based on awaiting for RSPO Secretariat to confirm liabilities for Sei Temarang Estate.</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 as all delays are justified as stated above.</p>	<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>Previously prior to certification, PT. Umbul Mas Wisesa and PT. Tonton Usaha Mandiri had liabilities. The compensation plan have been approved by the Compensation Task Force during the staged implementation of the RaCP between May 2014 and November 2015.</p>	<p>Complied</p>
<p>Any new plantings since January 1st 2010 shall comply with the RSPO New Plantings Procedure.</p>	<p>All the new development that are not yet certified has undergone NPP and published in the RSPO website</p> <p>PT Agro Muara Rupit</p> <ul style="list-style-type: none"> • https://rspo.org/certification/new-planting-procedure/public-consultations/sipef-group-pt-agro-muara-rupit-iii-and-iv-pt-amr • https://rspo.org/certification/new-planting-procedure/public-consultations/sipef-pt-agro-muara-rupit <p>PT Agro Kati Lama</p> <ul style="list-style-type: none"> • https://rspo.org/certification/new-planting-procedure/public-consultations/sipef-pt-agro-kati-lama-phase-ii <p>PT Agro Rawas Ulu</p> <ul style="list-style-type: none"> • https://rspo.org/certification/new-planting-procedure/public-consultations/sipef-pt-agro-rawas-ulu-new-planting-assessment-call-for-comments • https://rspo.org/certification/new-planting-procedure/public-consultations/sipef-pt-agro-rawas-ulu-new-planting-assessment-call-for-comments-1 • https://rspo.org/certification/new-planting-procedure/public-consultations/sipef-pt-agro-rawas-ulu-new-planting-assessment-call-for-comments-1 <p>PT Bandar Sumatra Indonesia</p>	<p>Complied</p>

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	https://rspo.org/certification/new-planting-procedure/public-consultations/sipef-pt-bandar-sumatra-indonesia-bandar-pinang-estate	
<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 4.4, 4.5, 4.6, 4.7 and 4.8.</p>	<p>The assessment team has conducted a search in internet to confirm that there is a lodged land conflict that was recorded as complaint under RSPO Case Tracker; raised by individual on those units that have not been certified.</p> <p>RSPO Case Tracker recorded complaint to PT. Agro Muara Rupit, dated 17 May 2017. The complainant brought forward the issue of fraudulent land title to RSPO. The complainant claimed that his land was fraudulently sold by his cousin to PT. Agro Muara Rupit, a subsidiary of SIPEF Group.</p> <p>On 20 December 2018, the complaint is officially closed. The case tracker available on link https://askrspo.force.com/Complaint/s/case/5090000028Es1JAAS/detail</p> <p>Based on RaCP tracker in RSPO website there are 4 MU's which have potential liability, 2 of them are PT. Umbul Mas Wisesa and PT. Tonton Usaha Mandiri (SIPEF) have been approved by the Compensation Task Force during the staged implementation of the RaCP between May 2014 and November 2015. Whilst the other 2, PT. Dendymarker Indah Lestari have submitted CN to the RSPO Secretariat and waiting for approval and PT Bandar Sumatra Indonesia awaiting for RSPO to revert regarding any potential liabilities.</p>	<p>Complied</p>
<p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2</p>	<p>The assessment team has conducted a search to RSPO Complaint Panel and RSPO Dispute Settlement Facility to confirm that there is a lodged complaint related to casual worker payment and welfare, that was recorded as complaint under RSPO Case Tracker; raised by complainant requesting confidentiality, on those SIPEF Management Unit that have not been certified.</p> <p>RSPO Case Tracker recorded complaint to PT. Agro Kati Lama. The case tracker available on link https://askrspo.force.com/Complaint/s/case/5000o000039f18kAAA/detail</p> <p>Date complaints submitted 22 January 2021. Date complaints accepted 5 March 2021. The complainant brought forward the issue of:</p>	<p>Complied</p>

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	<ul style="list-style-type: none"> -The daily casual workers are paid below the minimum wage set out by the Musi Rawas District Government; -The daily casual workers are not protected and no remedy available for work accidents; -The daily casual workers are not equipped with personal protection equipment [PPE] and are not equipped with working tools; -The daily casual workers did not receive festive allowance in accordance with the regulation; -The daily casual workers, who are hired through the third party, do not get a pay slip. The amount written in the payment receipt is without formal stamp and without the name of the party who rendered the payment. <p>SIPEF correspond with RSPO Grievance Manager – Indonesia to follow up the complaint on 16 March 2021, 19 March 2021 with highlight that the complainant has decided to resolve the complaint through mediation by RSPO Dispute Settlement Forum/DSF.</p> <p>On 1 April 2021, SIPEF sent formal response to the complaint, addressed to RSPO Grievance Manager. The latest update is on 25 August 2021 where the first pre-mediation was complete and pending finalization of the mediation process agreement.</p> <p>The Complaints Panel directs the Secretariat to encourage continuity to ensure that everybody is kept fresh and not forgotten to move a bit faster through the mediator.</p> <p>On 29 Sep 2021, The mediation process agreement is to be signed by both parties.</p> <p>On 06 Dec 2021, Pending outcome of the mediation under Dispute Settlement Facility.</p> <p>On 19 Jan 2022, DSF has been facilitated 3 mediation session; The parties agreed to follow up with the physical meeting and expected it to be conducted in February 2022.</p> <p>On 23 Feb 2022, This matter is under DSF for mediation; The next mediation session has been scheduled in March 2022.</p>	
<p>Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1</p>	<p>No legal non-compliance noted. The assessment team has conducted a search in internet to confirm that there is not new comments or dispute raised by the communities on those units that have not been certified.</p>	<p>Complied</p>

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<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>Currently (2021) Sungai Teramang Estate - PT Mukomuko Agro Sejahtera is uncertified estate. NPP for Sei Teramang Estate has been conducted onsite visit on 5 – 9 February 2021 by Global Gateway Certification. Area covers for NPP is 372.62 Ha. Submission of NPP notification to RSPO on September 2021 and still ongoing approval process by RSPO.</p> <p>Internal audit for Sungai Teramang Estate has been conducted in 19 July 2021. Report of internal audit completed in 14 August 2021 with reference to RSPO Certification System. Reference criteria of internal audit covers Criteria 2.1, 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12.</p> <p>Positive assurance statement already justified within the Internal Audit Checklist that Sungai Teramang Estate almost fulfilled with RSPO P&C requirement and Sungai Teramang Estate is ready to RSPO P&C certification as scheduled in Time Bound Plan.</p>	<p>Complied</p>
<p>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?</p>	<p>According to Internal Audit Report dated 14 August 2021, No Critical (Major non-compliance) raised against required RSPO P&C Criterion.</p>	<p>Complied</p>
<p>Have there been any stakeholder (including NGO) consultation conducted?</p>	<p>Stakeholder consultation conducted prior and during Surveillance Assessment on 25 February 2022 (NGO) and 9 February 2022 (government, contractor, communities, etc).</p>	<p>Complied</p>

3.2 Progress of scheme smallholders and/or outgrowers

<p>Progress of scheme smallholders or outgrowers towards compliance with relevant standards</p>		
<p>Requirement</p>	<p>Remarks</p>	<p>Compliance</p>
<p>Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification?</p> <p>OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years.</p>	<p>No smallholders involved in near future.</p>	<p>Complied</p>

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Approved Time Bound Plan

Name of the Unit of Certification	Country	Name of the Mills and Supply Bases	Location Address	GPS Coordinates (in decimal degree)		Total Managed Area (Ha)	Certification Status (Certified / Not certified)	Plan Year for Certification	Actual Certification Year
				Latitude	Longitude				
PT. Tolan Tiga Indonesia	Indonesia	Perlabian POM	Perkebunan Perlabian Village, Kampung Rakyat District, Labuhan Batu Selatan Regency, Sumatra Utara Province, Indonesia	2° 3' 40.98" N	100° 4' 57.19" E	-	Certified	-	17 May 2010
	Indonesia	Perlabian Estate	Perkebunan Perlabian Village, Kampung Rakyat District, Labuhan Batu Selatan Regency, Sumatra Utara Province, Indonesia	2° 3' 37.60" N	100° 4' 52.40" E	4,087.02	Certified	-	17 May 2010
	Indonesia	Tolan Estate	Perkebunan Perlabian Village, Kampung Rakyat District, Labuhan Batu Selatan Regency, Sumatra Utara Province, Indonesia	2° 0' 7.60" N	100° 2' 30.85" E	3,672.04	Certified	-	17 May 2010
PT. Eastern Sumatra Indonesia	Indonesia	Bukit Maradja POM	Nagori Marihat Bukit Village, Gunung Malela District, Simalungun Regency, North Sumatera Province – Indonesia	3° 0' 44.26" N	99° 14' 8.06" E	-	Certified	-	17 May 2010
	Indonesia	Bukit Maradja Estate	Nagori Marihat Bukit Village, Gunung Malela District, Simalungun Regency, North Sumatera Province – Indonesia	3° 0' 04.03" N	99° 13' 24.9" E	3,177.94	Certified	-	17 May 2010
	Indonesia	Kerasaan Estate	Nagori Marihat Bukit Village, Gunung Malela District, Simalungun Regency, North Sumatera Province – Indonesia	3° 3' 51.00" N	99° 15' 53.53" E	2,362.03	Certified	-	17 May 2010
	Indonesia	Timbang Deli Estate	Timbang Deli Village, Galang District, Deli Serdang Regency, Sumatera Utara Province – Indonesia	3° 27' 20.97"N	98° 53' 58.47"E	972.19	Certified	-	March 2018
PT. Umbul Mas Wisesa	Indonesia	Umbul Mas Wisesa POM	Tanjung Mulia Village, Kampung Rakyat District, Labuhanbatu Selatan Regency, North Sumatra Province, Indonesia	2° 12' 41.00"N	100°16'20.00"E	-	Certified	-	27 March 2015

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	Indonesia	Umbul Mas Wisesa South	Tanjung Mulia Village, Kampung Rakyat District, Labuhanbatu Selatan Regency, North Sumatra Province, Indonesia	2° 13' 5.10" N	100° 17' 12.40" E	4,783.61	Certified	-	27 March 2015
	Indonesia	Umbul Mas Wisesa North	Sei Siarti Village, Panai Tengah District, Labuhanbatu Regency, North Sumatra Province, Indonesia	2° 15' 7.16" N	100° 16' 43.01" E	2,979.74	Certified	-	27 March 2015
	Indonesia	Toton Usaha Mandiri	Sei Siarti Village, Panai Tengah District, Labuhanbatu Regency, North Sumatra Province, Indonesia	2° 15' 7.16" N	100° 16' 43.01" E	1,198.76	Certified	-	27 March 2015
KSU - Suka Makmur	Indonesia	Koperasi Serba Usaha Suka Makmur	Sukoharjo Hamlet, Tanjung Mulia Village, Kampung Rakyat District, Labuhanbatu Selatan Regency, Sumatera Utara Province, Indonesia	2° 11' 29.00" N	100° 19' 57.89" E	60.15	Certified	-	05 April 2018
PT. Agro Muko	Indonesia	Bunga Tanjung POM	Brangan Mulia Village, Terawang Jaya District, Mukomuko Regency, Bengkulu Province, Indonesia	2°43'00.39"S	101° 22' 16.94" E	-	Certified	-	22 February 2011
	Indonesia	Bunga Tanjung Estate*	Brangan Mulia Village, Terawang Jaya District, Mukomuko Regency, Bengkulu Province, Indonesia	2° 43' 30.14" S	101° 22' 21.51" E	2,903.00	Certified	-	22 February 2011
	Indonesia	Air Bikuk Estate*	Air Bikuk Village, Lubuk Bento Village and Air Berau Village, Pondok Suguh District, Mukomuko Regency, Bengkulu Province, Indonesia	2° 46' 27.67" S	101° 24' 44.68" E	1,410.00	Certified	-	22 February 2011
	Indonesia	Air Buluh Estate*	Air Buluh Village, Semundam Village, Tanjung Jaya Village, Talang Baru Village and Talang Arah Village, Malin Deman District and Ipuh District, Mukomuko Regency, Bengkulu Province, Indonesia	3° 01' 27.29" S	101° 33' 15.79" E	2,500.00	Certified	-	22 February 2011

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Indonesia	Malin Deman Estate*	Air Merah Village, Talang Arah Village and Talang Baru Village, Malin Deman District, Mukomuko Regency, Bengkulu Province, Indonesia	3°01' 27.29" S	101°33' 15.79" E	1,178.00	Certified	-	22 February 2011
Indonesia	Kebun Masyarakat Desa/KMD	Mukomuko Regency, Bengkulu Province, Indonesia	2°36' 25.05" S	101°16' 40.26" E	224.24	Certified	-	22 February 2011
Indonesia	Koperasi Perkebunan Desa Air Buluh Agromuko (KOPABA)	Air Merah Village and Air Buluh Village, Malin Deman District and Ipuh District, Mukomuko Regency, Bengkulu Province, Indonesia	3°03' 15.11" S	101°29' 53.43" E	139.51	Certified	-	22 February 2011
Indonesia	Koperasi Perkebunan Sejahtera Bersama Mukomuko Agro Sejahtera (KPSB-MMAS)	Air Merah Village and Air Buluh Village, Malin Deman District and Ipuh District, Mukomuko Regency, Bengkulu Province, Indonesia	2°58' 50.37" S	101°35' 51.83" E	167.75	Certified	-	22 February 2011
Indonesia	Mukomuko POM	Teruntung Village, Teras Terunjam District, Mukomuko Regency, Bengkulu Province, Indonesia	2°36' 05.76" S	101°16' 43.50" E	-	Certified	-	22 February 2011
Indonesia	Mukomuko Estate*	Air Dikit Village, Pondok Lunang Village, Air Kasai Village, Dusun Baru Village, Sari Bulan Village, Sumber Village, Teruntung Village, Talang Kuning Village, Air Dikit District and Teras Terunjam District, Mukomuko Regency, Bengkulu Province, Indonesia	2°39' 28.44" S	101°12' 57.48" E	4,101.20	Certified	-	22 February 2011
Indonesia	Sei Betung Estate*	Sidomulyo Village, Penarik Village, Lubuk Sahung Village, Talang Medan Village, Surian Bungkal Village, Sei Jerinjing Village, Talang Bungkal Village, Penarik District and Selagan Raya District, Mukomuko Regency, Bengkulu Province Indonesia	2°36' 1.59" S	101°22' 12.79" E	1,610.12	Certified	-	22 February 2011

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	Indonesia	Tanah Rekah Estate*	Tanah Harapan Village, Tanah Rekah Village, Air Dikit Village, Setia Budi/SP-IV Village, Kota Mukomuko District, Air Dikit District and Teras Terunjam District, Mukomuko Regency, Bengkulu Province, Indonesia	2° 36' 44.61" S	101° 10' 48.52" E	3,849.00	Certified	-	22 February 2011
	Indonesia	Talang Petai Estate*	Talang Petai Village, Talang Sepakat Village, Talang Sakti Village, Sungai Lintang Village, Sungai Rengas Village, Tunggal Jaya Village, V-Koto District and Teras Terunjam District, Mukomuko Regency, Bengkulu Province, Indonesia	2° 28' 24.42" S	101° 16' 33.09" E	2,270.00	Certified	-	22 February 2011
	Indonesia	Sei Kiang Estate*	Lubuk Cabau Village, V-Koto District, Mukomuko Regency, Bengkulu Province, Indonesia	2° 24' 41.18" S	101° 14' 19.71" E	2,171.03	Certified	-	22 February 2011
	Indonesia	Air Manjuntio Estate*	Talang Petai Village and Talang Sepakat Village, V-Koto District, Mukomuko Regency, Bengkulu Province, Indonesia	2° 24' 41.18" S	101° 14' 19.71" E	1,800.00	Certified	-	22 February 2011
	Indonesia	Kebun Masyarakat Desa/KMD and Koperasi Serba Usaha/KSU*	Mukomuko Regency, Bengkulu Province, Indonesia	2° 36' 25.05" S	101° 16' 40.26" E	441.80	Certified	-	22 February 2011
	Indonesia	Koperasi Produksi Plasma Sungai Tenang Sejahtera Mukomuko Agro Sejahtera	Talang Petai Village, V-Koto District, Mukomuko Regency, Bengkulu Province, Indonesia	2° 36' 25.05" S	101° 16' 40.26" E	140.00	Certified	-	22 February 2011
Hargy Oil Palm Limited (HOPL)	PNG	Hargy POM; Hargy Estate	East of Bialla, West New Britain Province, PNG	05° 18' 40.05" S	151° 00' 39.46" E	6,757.65	Certified	-	2009
	PNG	Navo POM; Navo Estate, Pandi Estate	50 Kms East of Bialla, West New Britain Province, PNG	05° 05' 38.86" S	151° 13' 28.03" E	13,701.89	Certified	-	2009
	PNG	Barema POM;	30 km East of Bialla, West New Britain Province, PNG	05° 12' 40.25" S	151° 07' 51.10" E	-	Certified	-	2014

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PT. Dendymarker Indah Lestari	Indonesia	Dendymarker POM	Karang Dapo I Village, Karang Dapo Sub-District, Musi Rawas Utara District, Sumatera Selatan Province, Indonesia	2° 47' 44" S	102° 56' 42" E	-	Certified	-	27 July 2015
	Indonesia	Sei Mandang Estate	Bingin Rupit and Beringin Jaya Village, Rupit Sub-District, Musi Rawas Utara District, Sumatera Selatan Province, Indonesia	2°46' 29" S	102° 52' 30" E	5,070.08	Certified	-	27 July 2015
	Indonesia	Sei Liam Estate	Karang Dapo I Village, Karang Dapo Sub-District, Musi Rawas Utara District, Sumatera Selatan Province, Indonesia	2° 46' 54" S	102° 56' 41" E	6,802.63	Certified	-	27 July 2015
PT. Bandar Sumatra Indonesia	Indonesia	Bandar Pinang Estate	Desa Kebun Bandar Pinang, Kecamatan Bintang Bayu, Kabupaten Serdang Bedagai	3° 19' 19.24" N	98° 55' 21.67" E	1,412.71	Not Certified	2025	-
PT. Citra Sawit Mandiri	Indonesia	Citra Sawit Mandiri Estate	Desa Pasar Tiga, Kecamatan Panai Tengah, Kabupaten Labuhan Batu	2° 33' 2.32" N	100° 12' 12.67" E	1,820.04	Not Certified	2024	-
PT. Agro Muko	Indonesia	Sei Jerinjing Estate	Talang Medan Village, Selagan Raya District, Mukomuko Regency, Bengkulu Province, Indonesia	2° 36' 10.69" S	101° 20' 21.66" E	2,099.68	Not Certified	2025	-
PT. Muko Muko Agro Sejahtera	Indonesia	Sungai Teramang Estate	Batu Ejung Village, Teramang Jaya District, Mukomuko Regency, Bengkulu Province, Indonesia	2° 45' 30.16" S	101° 22' 15.38" E	1,770.00	Not Certified	2022	-
	Indonesia	Batu Kuda Estate	Tunggang Village, Pondok Suguh District, Mukomuko Regency, Bengkulu Province, Indonesia	2° 50' 27.74" S	101° 28' 58.87" E	2,048.22	Not Certified	2024	-
PT. Agro Kati Lama	Indonesia	Agro Kati Lama North Estate	Desa Durian Remuk, Kecamatan Muara Beliti, Kabupaten Musi Rawas – Sumatera Selatan	3° 19' 46.18" S	102° 59' 52.05" E	2,464.00	Not Certified	2023	-
	Indonesia	Agro Kati Lama South Estate	Desa Muara Kati Lama, Kecamatan Tiang Pumpung Kepungut, Kabupaten Musi Rawas – Sumatera Selatan	3° 21' 32.07" S	103° 01' 27.90" E	3,590.00	Not Certified	2023	-
	Indonesia	Agro Kati Lama East Estate (AKL2)	Kelurahan Pasar Muara Beliti, Kecamatan Muara Beliti, Kabupaten Musi Rawas – Sumatera Selatan	3° 17' 32.50" S	103° 00' 50.02" E	1,514.00	Not Certified	2025	-

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	Indonesia	Koperasi Beringin Jaya (Smallholder)	Desa Durian Remuk, Kecamatan Muara Beliti, Kabupaten Musi Rawas – Sumatera Selatan	3° 17' 32.50" S	103° 00' 50.02" E	1,514.00	Not Certified	2023	-
PT. Agro Muara Rupit	Indonesia	Agro Muara Rupit East Estate (AMR2&3)	Desa Jadi Mulya, Kecamatan Nibung, Kabupaten Musi Rawas Utara – Sumatera Selatan	2° 33' 49.17" S	102° 55' 01.4" E	4,323.20	Not Certified	2023	-
	Indonesia	Agro Muara Rupit West Estate (AMR 1&2)	Desa Remban, Kecamatan Rawas Ulu, Kabupaten Musi Rawas Utara – Sumatera Selatan	2° 36' 04.42" S	102° 51' 05.53" E	6,566.90	Not Certified	2023	-
	Indonesia	Agro Muara Rupit South Estate (AMR 4)	Desa Beringin Sakti, Kecamatan Rawas Ilir, Kabupaten Musi Rawas Utara – Sumatera Selatan	2° 34' 47.55" S	102° 55' 21.23" E	4,200.82	Not Certified	2025	-
	Indonesia	Koperasi Rempan Jaya (Smallholder)	Desa Jadi Mulya, Kecamatan Nibung, Kabupaten Musi Rawas Utara – Sumatera Selatan	2° 32' 52.71" S	102° 57' 12.11" E	1,080.80	Not Certified	2025	-
	Indonesia	Koperasi Tingkip Jaya Raya (Smallholder)	Desa Remban, Kecamatan Rawas Ulu, Kabupaten Musi Rawas Utara – Sumatera Selatan	2° 37' 33.40" S	102° 51' 19.92" E	1,641.48	Not Certified	2023	-
PT. Agro Rawas Ulu	Indonesia	Agro Rawas Ulu East Estate	Desa Sungai Jauh, Kecamatan Rawas Ulu, Kabupaten Musi Rawas Utara – Sumatera Selatan	2° 36' 08.38" S	102° 44' 29.52" E	2,400.00	Not Certified	2023	-
	Indonesia	Agro Rawas Ulu West Estate	Desa Lubuk Mas, Kecamatan Rawas Ulu, Kabupaten Musi Rawas Utara – Sumatera Selatan	2° 40' 19.07" S	102° 37' 46.77" E	2,162.00	Not Certified	2023	-
	Indonesia	Koperasi Rawas Jaya (Smallholder)	Desa Pulau Lebar, Kecamatan Rawas Ulu, Kabupaten Musi Rawas Utara – Sumatera Selatan	2° 38' 20.16" S	102° 41' 06.61" E	1,150.00	Not Certified	2023	-

3.3 Details of Nonconformities

During this Assessment there were **Zero (0)** Critical; **Zero (0)** Minor nonconformities and **Zero (0)** Opportunity For Improvement raised.

Non-conformity			
NCR Ref #	Nil	Date Issued	-
Due Date	-	Date of nonconformity Closure	-
Clause & Category (Critical / Minor)	-		
Statement of Nonconformity:	-		
Requirement Reference:	-		
Objective Evidence:	-		
Corrections:	-		
Root Cause Analysis:	-		
Corrective Actions:	-		
Assessment Conclusion:	-		

Opportunity for Improvements	
OFI #	Description
OFI 1	Nil

Positive Findings	
PF #	Description
PF 1	Nil

3.3.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	-	Date Issued	-
Due Date	-	Date of nonconformity Closure	-
Clause & Category (Critical / Minor)	-		
Statement of Nonconformity:	-		

Requirement Reference:	-
Objective Evidence:	-
Corrections:	-
Root Cause Analysis:	-
Corrective Actions:	-
Assessment Conclusion:	-

Opportunity for Improvement	
OFI#	Description
OFI 1	<p>OFI Statement: RSPO P&C 7.12.7 Tolan Estate has conduct and record monitoring upon RTE species and other wild animal in the HCV identified area. Consideration for broader monitoring RTE species and other wild animal in other area such as plantation boundaries.</p> <p>Verification / Follow-up actions: Record monitoring animal wildlife and RTE species in plantation boundary has been carried out, in example "Checklist Pemantauan Area HCV" dated 21 January 2022. Location: buffer zone at boundary area Block F16 Division 2.</p>

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1754048-201903-M1	Major	RSPO Supply Chain Certification Standard (June 2017) General Chain of Custody Requirement- Clause 5.7.2	30 March 2019	Closed on 3 May 2019

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 Tolan Tiga Indonesia – Perlabian 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.

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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 department	<ul style="list-style-type: none"> - Dinas Lingkungan Hidup, Kab. Labuhanbatu Selatan. - Dinas Perkebunan dan Kehutanan, Kab. Labuhanbatu Selatan. - Dinas Tenaga Kerja, Kab. Labuhanbatu Selatan. - Kantor Pertanahan Kab. Labuhanbatu 	Phone interview
Local communities	Village of Air Merah Village of Meranti	Phone interview
Local NGO	Swara Nasional	Phone interview
Contracted parties	<ul style="list-style-type: none"> - UD Putra Labuhanbatu Jaya - PT Tri Royal Timurjaya - PT Solusi Sekuriti Indonesia 	Phone interview Face to face interview
Internal	Gender Committee, new mother	Face to face interview
Union	Serikat Pekerja Mandiri Tolan Tiga	Face to face interview

Stakeholders comment	
01	<p>Feedbacks: Dinas Perkebunan dan Kehutanan, Kabupaten Labuhanbatu Selatan</p> <ul style="list-style-type: none"> - Plantation Assessment or "Penilaian Perkebunan" is responsibility by provincial level. Therefore, regency government have no update against new plantation assessment result. - Fast response from the company if government agency need clarification against particularly information. - Mandatory report is submitted to agency punctually and no issue on that. - Renewal of Land Title is in progress, 20% of smallholders as required by license is still developed. <p>Audit Team verification and response: Verification onsite has conducted to ensure stakeholder comments are implemented well. Positive feedback no need to respond.</p>
02	<p>Feedbacks: Dinas Tenaga Kerja, Kabupaten Labuhanbatu Selatan</p> <ul style="list-style-type: none"> - No issues related worker forces within last 12 months, it might be company already well implement. All mandatory requirements have been fulfilled by the company.

Stakeholders comment	
	<ul style="list-style-type: none"> - Worker union is available namely Serikat Pekerja Mandiri and communication in good way. - Workers' wages are paid appropriately with minimum wages that required by government. - All mandatory report is submitted punctually and no issues on that. <p>Audit Team verification and response: Verification onsite has conducted to ensure stakeholder comments are implemented well. Positive feedback no need to respond.</p>
03	<p>Feedbacks: Dinas Lingkungan Hidup, Kabupaten Labuhanbatu Selatan</p> <ul style="list-style-type: none"> - Environmental report, including waste management report already submitted as required by regulation. These reports was submitted directly to Environmental Agency in hardcopy and sent to Ministry of Environmental and Forestry through application SIMPEL and SI RAJA WASTE. - For newly rules concerning environmental aspect within new Indonesian law "Undang Undang Cipta Kerja", no need to amend its environmental license unless any changes of environmental impact from new operation. - Ensure that hazardous waste produce by independent smallholders are controlled and well managed. It's have cooperated with PT Tolan Tiga Indonesia as company that have permitted to manage wasted responsibly. - No land fire issues in 12 months for company and independent smallholders' area. <p>Audit Team verification and response: Verification onsite has conducted to ensure stakeholder comments are implemented well.</p> <ul style="list-style-type: none"> - Auditor verified that environmental report is updated and can demonstrated during onsite audit. - During onsite visit in Mill and Estate, new activities that causing new environment impact was not exist. Therefore, existing environment license are still valid and no need to amend. - Firefighting facilities (fire team, water tank, nozzle and hose, fire monitoring tower, etc.) is available and well maintain by the company to prevent land fire.
04	<p>Feedbacks: Kantor Pertanahan, Kab. Labuhanbatu</p> <ul style="list-style-type: none"> - Renewal of land title PT Tolan Tiga Indonesia are in progress but land office has no information on this, because based on the total area covers is under provincial land office. - Since the period of renewal, there is no land disputes nor complaint from stakeholders. <p>Audit Team verification and response: Verification onsite has conducted to ensure stakeholder comments are implemented well. Positive feedback no need to respond. Letter for Renewal Land Title of PT Tolan Tiga Indonesia has been submit to provincial land agency as per:</p> <ul style="list-style-type: none"> - Letter # HP.01.01/92-12.31/XII/2021, dated 31 December 2021 (Perlabian Estate). - Letter # HP.01.01/93-12.31/XII/2021, dated 31 December 2021 (Tolan Estate).
05	<p>Feedbacks: Desa Air Merah and Desa Meranti (local communities)</p> <ul style="list-style-type: none"> - Very thankful to company for supporting surrounding communities in regard to community program. - So far, the company gave positive impact to the communities. Particularly free access for grass collection inside the plantation and solid from palm oil mill processing to add nutrition for cattle. - Worker recruitment is communicated with village staff and the company prioritizing local communities.

Stakeholders comment	
	<ul style="list-style-type: none"> - No negative issues raise <p>Audit Team verification and response: Verification onsite has conducted to ensure stakeholder comments are implemented well. Positive feedback no need to respond.</p>
06	<p>Feedbacks: Swara Nasional</p> <ul style="list-style-type: none"> - SIPEF is very good company. Communication with stakeholders are in positive way. As a local NGO always monitored all the activities of this company, from environment, social, legal and community aspects, no infringement is occurring. - This company are prioritizing local workers to be hires, there is no issues in regards of manpower's for the last 3 years. <p>Audit Team verification and response: Verification onsite has conducted to ensure stakeholder comments are implemented well. Positive feedback no need to respond.</p>
07	<p>Feedbacks: UD Putra Labuhanbatu Jaya (FFB Transporter)</p> <ul style="list-style-type: none"> - The collaboration with PT Tolan Tiga Indonesia has been going on for a long time, and there have never been any problems. - Currently, their activities in PT Tolan Tiga Indonesia is FFB transportation. - UD Putra Labuhanbatu Jaya always fulfil all requirements that required by PT Tolan Tiga Indonesia, including compliance with law and regulation concerning workers (no children workers), workers insurance coverage, workers payment, PPE requirements, etc. - Payment from PT Tolan Tiga Indonesia is always on time and never outstanding. - So far, no negative issues raise and reported from PT Tolan Tiga Indonesia against UD Putra Labuhanbatu Jaya as contractor in regard services performance at the field. <p>Audit Team verification and response: Verification onsite has conducted to ensure stakeholder comments are implemented well. Positive feedback no need to respond.</p>
08	<p>Feedbacks: PT Tri Royal Timurjaya (Civil and Mechanical Contractor Perlabian Mill)</p> <ul style="list-style-type: none"> - Company giving awareness and dissemination to all company policies, including RSPO requirements that Do's and Don'ts to our workers. - The company are frequent request several services and no outstanding payment. - Business ethic is well implemented by PT Tolan Tiga Indonesia <p>Audit Team verification and response: Verification onsite has conducted to ensure stakeholder comments are implemented well. Positive feedback no need to respond.</p>
09	<p>Feedbacks: PT Solusi Sekuriti Indonesia doing business as Safeguarding Solutions Indonesia (Security Services)</p> <ul style="list-style-type: none"> - Their duties and responsibilities are to safeguard all company assets, both movable and immovable assets. - Company giving awareness and dissemination to all company policies, including RSPO requirements that Do's and Don'ts to our personnel as security guard.

Stakeholders comment	
	<ul style="list-style-type: none"> - When company personnel found and saw the FFB thievery, they will report to team leader to grab the thief and interrogated them. During interrogation, their personnel do not instigate violence or use any form of harassment. Afterwards, this case will submitted to Police Department for further actions. - SSI as contracted security services will not using violence or harassment to everyone, including plantation/mill workers. Because SSI has had own procedure for operating.
	<p>Audit Team verification and response: Verification onsite has conducted to ensure stakeholder comments are implemented well. Positive feedback no need to respond.</p>
10	<p>Feedbacks: Gender Committee and New Mother</p> <ul style="list-style-type: none"> - No negative issue on gender since the organization established. - For new mother, the company given access for breastfeeding at 9-10 am every day. Most of new mother are worked at office as administration.
	<p>Audit Team verification and response: Verification onsite has conducted to ensure stakeholder comments are implemented well. Positive feedback no need to respond.</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
Not Applicable					

Previous land owner / user comment	
	<p>Feedbacks: Not Applicable. Second replanting cycle is applied.</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

<p>The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that PT Tolan Tiga Indonesia – Perlabian 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 Tolan Tiga Indonesia – Perlabian POM is remain certified.</p>	
Report prepared by	Acceptance of Assessment Conclusion
Name: Yudwi Wisnu Rahmanto	Name: Sander Van Den Ende
Company Name: BSI Services Malaysia Sdn. Bhd.	Company Name: PT. Tolan Tiga Indonesia – Perlabian POM
Title: Lead Auditor	Title: Regional Director Sustainability
<p>Signature:</p> 	<p>Signature:</p> <p><i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i></p> 
Date: 25 March 2022	Date: 06 April 2022

Appendix A: Summary of Findings

Criterion / Indicator	Assessment Findings	Compliance
<p>Principle 1: Behave ethically and transparently 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>PT. Tolan Tiga Indonesia consistently renew the list of documents made publicly available.</p> <ul style="list-style-type: none"> • Perlabian POM updated the list of documents made publicly available on 24 February 2022, comprise of 14 documents. • Perlabian Estate updated the list of documents made publicly available on 3 February 2022, comprise of 21 documents. • Tolan Estate updated the list of documents made publicly available on 22 February 2022, comprise of 19 documents. <p>In general, based on document verification to estates and palm oil mill, type of document made publicly available:</p> <p>a. Copy of land title/HGU, in form of:</p> <ul style="list-style-type: none"> • Decree as per "Surat Keputusan Menteri Negara Agraria/Kepala Badan Pertanahan No.SK 80/HGU/BPN/97, dengan luas 6,042.44 Ha, yang berlokasi di Desa Kebun Perlabian, Kecamatan Kampung Rakyat, Kabupaten Labuhanbatu, Provinsi Sumatera Utara. Masa berlaku sampai dengan 31 Desember 2023", dated 16 July 1997. Based on the decree, HGU certificate issued by "Kantor Pertanahan Kabupaten Labuhanbatu No. 02 tertanggal 17 September 1997 dengan luas 6,042.44 Ha sesuai dengan Surat Ukur No. 2868/1997" dated 17 September 1997".

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		<ul style="list-style-type: none"> • Decree as per "Surat Keputusan Menteri Negara Agraria/Kepala Badan Pertanahan No.SK 86/HGU/BPN/97, tanggal 23 Juli 1997, dengan luas 2,436.62 Ha, yang berlokasi di Desa Tolan Pekan, Kecamatan Kampung Rakyat, Kabupaten Labuhanbatu, Provinsi Sumatera Utara" dated 23 July 1997. Based on the decree, HGU certificate issued "Sertifikat HGU oleh Kantor Pertanahan Kabupaten Labuhanbatu No. 02 tertanggal 17 September 1997 dengan luas 2,436.62 Ha sesuai dengan Surat Ukur No. 2869/1997" dated 17 September 1997. b. OHS Committee Program as in "Program Panitia Pembina Kesehatan dan Keselamatan Kerja, Lingkungan Hidup dan Sosial (P2K3LHS)" for each estate and mill. c. Environmental permit, Environmental Aspect-Impact Assessment and its report as in "Dokumen Lingkungan (AMDAL), dokumen Laporan pelaksanaan RKL-RPL"; d. HCV identification report, HCV management and monitoring document, HCV report as in "Dokumen Identifikasi HCV, Rencana Pengelolaan dan Pemantauan HCV, Laporan HCV". e. Complaint document from stakeholders and company response upon these complaints as in "Dokumen keluhan yang diterima dari stakeholder dan tanggapan perusahaan atas keluhan tersebut". f. Procedure for handling information request and responding to information request. g. 24 sets of procedures and working instructions i.e: "Prosedur Legal and Corporate Affair Department Manual, Environment and Conservation Department Manual, Estate Department Manual, Palm Oil Mill Operational Manual, Internal Audit Department Manual, Occupational Health and Safety Operational Manual, Laboratory independent Operational Manual, Purchasing Department Manual, Engineering Department Manual", etc. 	
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1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders.	<p>Based on document verification, the document listed above in 1.1.1 is available in Bahasa Indonesia and some document made bi-lingual, Bahasa Indonesia and English:</p> <ul style="list-style-type: none"> • Company policies available in English and Bahasa Indonesia; • Prosedur-Prosedur operasional perusahaan available in English and Bahasa Indonesia; • The document of Land Title/Izin HGU, Environmental Permit/AMDAL, HCV Identification/Identifikasi HCV, Social Impact Assessment available in Bahasa Indonesia; • The document of OHS Committee Management Plan available in Bahasa Indonesia; • The document of GHG identification and GHG Mitigation Plan available in Bahasa Indonesia; • Public summary of the certification assessment report oleh CB available in English; • Internal Audit RSPO P&C Report available in Bahasa Indonesia; • The document of Stakeholder Complaint, Grievance and respond upon complaint and grievance from stakeholder available in Bahasa Indonesia; • The document of Continuous Improvement available in Bahasa Indonesia; 	Complied
1.1.3	(C) Records of requests for information and responses are maintained.	<p>Records of requests for information and responses are maintained by each estate and mill, under logbook title "Rekaman Permintaan Informasi & Tanggapan":</p> <ul style="list-style-type: none"> • In year 2021, Perlabian POM recorded 15 information requests from stakeholders. Most of them in type of donation request. Sample taken: A letter from Plantation Agency on 18 August 2021 related to request for solid, responded on same day. • In year 2021, Perlabian Estate recorded 3 information requests from stakeholders (through message and official letter). Sample taken: A letter from Village Head/Kepala Desa Tanjung Medan on 9 March 2021 related to 	Complied

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		<p>backhoe loader loan proposal for village road maintenance. Responded on same date. Up to February 2022, there is no information request.</p> <ul style="list-style-type: none"> In year 2021, Tolan Estate recorded 15 information requests from stakeholders. Most of them in type of donation request or meeting invitation. Sample taken: A letter from Manpower Service No. 560/600/Naker/XI/2021 dated 30 November 2021 related to "Undangan Sosialisasi Tentang Perundingan Bipartit, LKS Bipartit, LKS Bipartit & Jaminan Kehilangan Pekerjaan" and responded by sending representative to attend the meeting on 1 December 2021. 	
1.1.4	(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official.	Records of consultation and communication also documented in the same logbook "Rekaman Permintaan Informasi & Tanggapan". In year 2021, Perlabian POM recorded 15 information requests from stakeholders. Most of them in type of donation request. Sample taken: A letter from Plantation and Veterinary Agency on 18 August 2022 related to request for solid transport, responded on same day.	Complied
1.1.5	An up-to-date list of contacts and detailed stakeholder information is available along with designated representatives.	<p>Stakeholder list available and updated, for example:</p> <p>Perlabian POM stakeholder list updated comprise of list of stakeholders covering Government (7 stakeholders), MUSPIKA (4 stakeholders), Village heads (10 stakeholders), NGO and press (2 stakeholders), Worker union (5 stakeholders), buyer (2 stakeholders), contractors (3 stakeholders), transporter (2 stakeholders).</p> <p>Perlabian Estate stakeholder list updated 15 February 2022 comprise of 36 stakeholders covering Government (7 stakeholders), MUSPIKA (4 stakeholders), Village heads (10 stakeholders), NGO and press (2 stakeholders), Worker union (5 stakeholders), buyer (2 stakeholders), contractors (3 stakeholders), transporter (2 stakeholders).</p> <p>Tolan Estate stakeholder list updated 18 February 2022 comprise of 22 stakeholders covering Government (5 stakeholders), MUSPIKA (3 stakeholders), Village heads/elders (8 stakeholders), NGO (1 stakeholder), Worker union (1 stakeholder), and Contractors (3 stakeholders) and Hospital (1 stakeholder).</p>	Complied

		The stakeholder list explains the name of stakeholders, representative, address and contact number.	
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. Tolan Tiga Indonesia has Code of Conduct No.QMM-40-01-P19/21- 08-2018/Rev.0 dated 28 September 2018. The code of conduct standards are the company internal guidelines for work ethics, commitment and the enforcement of company internal guideline for work ethics, commitment and the commitment and the enforcement of company regulations for individuals when conducting business and other activities, as well as interacting with stakeholders. Basic attitudes of individuals, company employees will demonstrate: Compliance with company regulations, An ethical approach to their work, honesty and discipline at work, openness and willingness to improve themselves, mutual respect and courtesy towards others, egalitarian attitudes and behaviour, willingness to be placed anywhere according to company requirements and prevailing conditions.</p> <ul style="list-style-type: none"> • Regulates conduct as superior, employees in superior position must always be a good role model in words and actions, being fair and open with subordinates, establish open and constructive communication with subordinates, follow a policy of always trying to coordinate cooperative relationships, fostering harmonious teamwork, avoid using position or post for personal, group or any other party's interests. • Regulates behavior as a Subordinate, employees in subordinate positions are expected to always be respectful and polite to supervisor and loyal to the company when executing any given task, communicate with superior honestly, openly and ethically, perform actions that are only within their authority. • Company records, documents and information must be accountable, accurate and timely, therefore, the individuals responsible for the management of records, documents and information must be honest, objective and responsible. 	Complied

		<ul style="list-style-type: none"> • Each individual will secure, protect, maintain and use company property the best possible way, according to the provisions, use company property only in the interests of the company. • The company will not tolerate insider trading practices and will take legal action against insider trading in accordance to applicable regulations. • Each individual has an obligation to put the interests of the company first and avoid conflicts of interest in various forms by the company. It is not permissible to have business ties, personally or involving families, that can cause business conflicts with the company. • Company employees may not become an administrator of a political party or a political candidate unless there is written permission from the company. • Giving or receiving a sign of gratitude for interests in a business relationship, in the form of gifts of any kind or souvenirs, must not be done in a situation considered as an act that does not meet principle of decency and fairness. Donation can only be made for charitable purpose and other social objectives, tailored to financial capacity of the company as well as laws and regulations. The company and each individuals do not give, offer or receive, directly or indirectly, anything of value or in the form of promises, that can be categorized as bribe to or from customer or government officials to influence decision. • Every individuals is obliged to report any breach of the Code of conduct made by other individuals with sufficient evidence, through the communication channels provided by the Company. • The provision of sanction for breaches of the Code of conduct by individuals in the company is determined in accordance with the provisions of the company and/or prevailing laws and regulations. <p>Perlabian POM:</p>	
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		<p>Socialization of this policy in Perlabian POM carried out on 22 July 2021; attended by 98 workers from security, loading ramp, laboratory, office, weighbridge, driver, process station and biogas plant.</p> <p>Perlabian Estate: Socialization of this policy has conducted regularly. For example, sighted the record of company's policy on "Kebijakan Anti Korupsi, Kebijakan Integritas Supplier, Kebijakan Pelaporan Pelanggaran/Whistleblowing, Kebijakan Keamanan IT, Kebijakan Kode Etik"; socialization on 3 - 5 February 2022. For example, there is an evidence of the socialization attended by 32 workers from Division 5 (harvesters, harvesting mandors and loose fruit collectors); 28 workers from Division 3 (harvesters, harvesting mandors and loose fruit collectors); 106 workers from Division 4 (harvesters, harvesting mandors, loose fruit collectors sprayers, fertilizer applicator, pesticide applicator, tally clerk and FFP transport worker).</p> <p>Tolan Estate: Socialization on 2 March 2022 42 workers from Division IV (harvesters, spraying team, harvesting mandor, manuring). Based on the interview with the workers during field visit obtain information that the workers have understand on company's policy such as no child labor policy, ethical conduct (anti bribery), no sexual harassment, OHS policy and anti-discrimination.</p> <p>To prove the implementation of the code of ethics, the team of auditors has interviewed board of labor union and village heads around the company's operational areas. Based on the results of interviews obtained information that the employee recruitment process has been openly informed. The results of the recruitment procedure can be accessed by prospective employees and there is no charge for the whole process. This also applies to the recruitment of SIPEF estate security services conducted by PT Safeguarding Solution Indonesia (SSI).</p>	
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<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>Certificate holder has had annual internal audit program to monitor and to ensure operational activity align with the company's procedures. Furthermore, the internal audit also ensuring all business activity are comply with SIPEF ethics policy.</p> <p>Internal Audit in Perlabian POM against RSPO, ISPO, ISCC standard dated 15 – 17 July 2020. The internal audit issued 7 findings. However, no findings related to code of ethical conduct.</p> <p>Based on interview with random worker in Perlabian POM, he admitted there was no imposition of worker recruitment costs, there was no imposition of recruitment and transportation costs that are deducted from the worker's wages.</p> <p>Contractor issued statement letter: CV Putra Labuhanbatu Jaya issued statement letter dated 3 January 2022 that: CV Putra Labuhanbatu Jaya will abide to regulation and laws in Republic of Indonesia; will not practice forced labor or employ trafficked labour; will not employ worker under 18 years old; will not employ worker that consume drug and alcohol, will pay the wage according to minimum wage stipulated by the local government registered their worker in health and worker insurance (BPJS Kesehatan and BPJS Ketenagakerjaan).</p> <p>All unit (estate or mill) conduct the contractor evaluation annually and recorded on the document "Checklist Evaluasi Pemenuhan Standard RSPO Untuk Kontraktor". Sighted the record of evaluation on behalf of CV Putra Labuhanbatu Jaya period 2021 on 22 February 2022. According to the evaluation result, the contractor still comply with all the company requirement and the contract can be extended.</p>	<p>Complied</p>
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Principle 2: Operate legally and respect rights

Implement legal requirements as the basic principles of operation in any jurisdiction.			
Criteria 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	(C) The unit of certification complies to relevant regulations.	<p>Unit of Certification prepared and maintained a list of legal requirements as per describe in "Daftar Peraturan Perundangan Indonesia yang Berkaitan dengan Sistem Sustainability", update December 2021.</p> <p>Unit of Certification has monitored the change in laws and regulation. The changes and update in laws and regulation documented under "Pemantauan Penambahan atau Perubahan Undang-Undang/Peraturan tahun 2020". Based on document verification, there are 19 type laws and regulation changed – relevant and applicable to the company operations:</p> <ul style="list-style-type: none"> a) Governor of Sumatera Utara Province Decree related to the minimum wage as per "Keputusan Gubernur Sumatera Utara No. 188.44/578/Kpts/2020 tentang Upah Minimum Sektoral Kabupaten Labuhan Batu Selatan tahun 2021" – new regulation. b) Minister of Agriculture related to ISPO certification as per "Peraturan Menteri Pertanian Republik Indonesia No. 38 tahun 2020 tentang Peyelenggaraan Sertifikasi Kelapa Sawit Berkelanjutan Indonesia". c) Minister of Health related to Vaccination to Avoid Pandemic as per "Peraturan Menteri Kesehatan No. 10 tahun 2021 tentang Pelaksanaan Vaksinasi Dalam Rangka Penanggulangan Pandemi" – new regulation. <p>The documented laws and regulation provide information type of laws/regulation as new or replacing obsolete laws, the impact to company's system, Source of laws/regulation document, Area of concerns, Remarks, and other things.</p> <p>From stakeholder consultation with relevant government services (Dinas Perkebunan, Dinas Lingkungan Hidup dan Dinas Tenaga Kerja Kabupaten</p>	Complied

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		<p>Labuhanbatu Selatan) and village heads, as well as worker union, the company fulfil all legal, laws, and regulations requirement: legal ownership of the land, legal entity, tax and retribution, regulation related to manpower, regulation related to environmental management.</p> <p>Based on visit and document verification, PT. Tolan Tiga Indonesia demonstrate effort to comply with laws and regulation, such as: "Izin Usaha Perkebunan", Land Title – "Hak Guna Usaha/HGU", maintenance of HGU boundary poles, evidence of worker payment meets minimum wage regulations, overtime payment as per regulation, annual leave provision for workers, all level of worker registered with social insurance, environmental permit is valid, hazardous waste storage permit is valid, reports related to environmental performance submitted to regulatory bodies.</p>	
2.1.2	<p>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.</p>	<p>Unit of Certification has procedure to ensure laws and regulation compliance, under "SOP Legal and Corporate Affair Department Manual No. LCA-01-08/24-01-2020/Rev.0" dated 17 March 2020. The SOP regulated Update Information and News and Regulations whenever new regulation issued, take into consideration legal opinion from Vice President Legal – if necessary.</p> <p>Unit of Certification has documented 266 laws and regulations relevant to oil palm plantation operation in year 2020, this including international convention, national laws, provincial and local laws.</p> <p>Unit of Certification has monitored the change in laws and regulation. The changes and update in laws and regulation documented under "Pemantauan Penambahan atau Perubahan Undang-Undang/Peraturan tahun 2020". Based on document verification, there are 19 type laws and regulation changed – relevant and applicable to the company operations:</p>	Complied

		<p>a) Governor of Sumatera Utara Province Decree related to the minimum wage as per "Keputusan Gubernur Sumatera Utara No. 188.44/578/Kpts/2020 tentang Upah Minimum Sektoral Kabupaten Labuhan Batu Selatan tahun 2021" – new regulation.</p> <p>b) Minister of Agriculture related to ISPO certification as per "Peraturan Menteri Pertanian Republik Indonesia No. 38 tahun 2020 tentang Peyelenggaraan Sertifikasi Kelapa Sawit Berkelanjutan Indonesia".</p> <p>c) Minister of Health related to Vaccination to Avoid Pandemic as per "Peraturan Menteri Kesehatan No. 10 tahun 2021 tentang Pelaksanaan Vaksinasi Dalam Rangka Penanggulangan Pandemi" – new regulation.</p> <p>The legal department also conducted the evaluation of legal compliance of third parties engaged. Especially the fulfilment of working agreement.</p>	
2.1.3	<p>Legal or authorized boundaries are clearly demarcated and visibly maintained and there is no planting beyond these legal or authorized boundaries.</p>	<p>Unit of Certification had 86 boundary poles in Tolan Estate and 37 boundary poles in Perlavian Estate. Based on the existing procedures, all boundary poles shall be monitored regularly (every 2 month) by upkeep supervisor in each division. The record of monitoring can be seen in document "Pemeriksaan Nomor Patok HGU" (latest document on November 2021).</p> <p>During the field visit, auditor team has random-checked the boundary poles in each unit as follows:</p> <ul style="list-style-type: none"> • Tolan Estate: <ul style="list-style-type: none"> ➤ Boundary poles No. 8 Block 96A16 Division 3. ➤ Boundary poles No. I Block 96A13 Division 3. ➤ Boundary poles No. XLII Block 96B13A Division 3. ➤ Boundary poles No. XLIII Block 12A09A Division 1. ➤ Boundary poles No. XLV Block 10A04A Division 1. • Perlavian Estate: <ul style="list-style-type: none"> ➤ Boundary poles No. II Block 10B08A Division 5. 	Complied

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		<ul style="list-style-type: none"> ➤ Boundary poles No. III Block 10B08A Division 5. ➤ Boundary poles No. IV Block 10B08A Division 5. ➤ Boundary poles No. V Block 05C07A Division 5. ➤ Boundary poles No. VIII Block 95D01A Division 1. <p>All boundary poles visited clearly visited and well-maintained.</p>	
Criteria 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.			
2.2.1	A list of contracted parties is available.	<p>PT. Tolan Tiga Indonesia established list of contractors up to date. List of contractor provides service in Perlabian POM recorded under "Stakeholder Perlabian Palm Oil Mill", dated 24 February 2022". There are 3 contractors: PT. Persada Dinamika Jaya (repairing Boiler 26 Ton), PT. Tri Royal Timur Raya (Mill Maintenance), PT. Sempurna Wiratama Teknik Lestari (Repairing Main Switch Board).</p> <p>List of contractor provides service in Perlabian Estate recorded under "Stakeholder Perlabian Estate", dated 3 February 2022". There are 6 contractors: CV Astron Raksa Family (EFB transport and fibre), General Auto Teknik (construction material), UD Putra Labuhanbatu Jaya (FFB transport), Solusi Security Indonesia (security), Koperasi Serba Usaha OMI (food stock), Koperasi Jasa Karyawan (manpower supplier).</p>	Complied
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>PT. Tolan Tiga Indonesia made all contract contain specific clause on meeting relevant legal requirements.</p> <p>Sample for Perlabian POM,</p> <ol style="list-style-type: none"> 1. contract "<i>Surat Perjanjian Kerja No.11/PLM-HO/ENG/2022 antara PT. Tolan Tiga Indonesia dengan PT. Persada Dinamika Jaya untuk pekerjaan Repairing Boiler 26 Ton di Perlabian POM</i>" signed on 17 January 2022. The contract, Article 7 point 4 stipulates contractor shall guarantee and comply with Indonesia Laws and Regulations. Contractor shall guarantee not employed child under 18 y.o, not employ force and trafficked labour. 	Complied

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		<p>2. contract "Surat Perjanjian Kerja No.11/PLM-HO/ENG/2022 antara PT. Tolan Tiga Indonesia dengan PT. Triroyal Timurraya untuk pekerjaan 1 Lot Build Up Solid Box di Perlabian POM" signed on 10 January 2022. The contract, Article 7 point 4 stipulates contractor shall guarantee and comply with Indonesia Laws and Regulations. Contractor shall guarantee not employed child under 18 y.o, not employ force and trafficked labour.</p> <p>Sample for Tolan Estate: contract "Surat Perjanjian Kerja No.01/RMO-TLE/PLJ/I/2022 antara PT. Tolan Tiga Indonesia dengan UD. Putra Labuhanbatu Jaya untuk Angkut FFB di Tolan Estate" signed on 3 January 2022. The contract, Article 5 stipulates contractor shall guarantee and <u>comply with Indonesia Laws and Regulations</u> regarding Working Accident, Taxes, Disallowing employed children under 18 y.o, Minimum Wage, Drugs, Sexual Harassment.</p> <p>Sample for Perlabian Estate: contract: "Surat Perjanjian Kerja No.01/RMO-PLE/PLJ/I/2022 antara PT. Tolan Tiga Indonesia dengan UD. Putra Labuhanbatu Jaya tentang Angkut TBS" signed on 3 January 2022. The contract, Article 5 stipulates contractor shall guarantee and <u>comply with Indonesia Laws and Regulations</u> regarding Working Accident, Taxes, Disallowing employed children under 18 y.o, Minimum Wage, Drugs, Sexual Harassment.</p>	
2.2.3	All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour.	<p>PT. Tolan Tiga Indonesia made all contract contain specific clause on meeting relevant legal requirements.</p> <p>Sample for Perlabian POM,</p> <p>1. contract "Surat Perjanjian Kerja No.11/PLM-HO/ENG/2022 antara PT. Tolan Tiga Indonesia dengan PT. Persada Dinamika Jaya untuk pekerjaan Repairing Boiler 26 Ton di Perlabian POM" signed on 17 January 2022. The contract, Article 7 point 4 stipulates contractor shall guarantee and comply with</p>	Complied

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		<p>Indonesia Laws and Regulations. Contractor shall guarantee not employed child under 18 y.o, not employ force and trafficked labour.</p> <p>2. contract "Surat Perjanjian Kerja No.11/PLM-HO/ENG/2022 antara PT. Tolan Tiga Indonesia dengan PT. Triroyal Timurraja untuk pekerjaan 1 Lot Build Up Solid Box di Perlabian POM" signed on 10 January 2022. The contract, Article 7 point 4 stipulates contractor shall guarantee and comply with Indonesia Laws and Regulations. Contractor shall guarantee not employed child under 18 y.o, not employ force and trafficked labour.</p> <p>Sample for Tolan Estate: contract "Surat Perjanjian Kerja No.01/RMO-TLE/PLJ/I/2022 antara PT. Tolan Tiga Indonesia dengan UD. Putra Labuhanbatu Jaya untuk Angkut FFB di Tolan Estate" signed on 3 January 2022. The contract, Article 5 stipulates contractor shall guarantee and comply with Indonesia Laws and Regulations regarding Working Accident, Taxes, <u>Disallowing employed children under 18 y.o</u>, Minimum Wage, Drugs, Sexual Harassment.</p> <p>Sample for Perlabian Estate: contract: "Surat Perjanjian Kerja No.01/RMO-PLE/PLJ/I/2022 antara PT. Tolan Tiga Indonesia dengan UD. Putra Labuhanbatu Jaya tentang Angkut TBS" signed on 3 January 2022. The contract, Article 5 stipulates contractor shall guarantee and <u>comply with Indonesia Laws and Regulations</u> regarding Working Accident, Taxes, <u>Disallowing employed children under 18 y.o</u>, Minimum Wage, Drugs, Sexual Harassment.</p>	
<p>Criteria 2.3: All FFB supplies from outside the unit of certification are from legal sources.</p>			
<p>2.3.1</p>	<p>(C) For all directly sourced FFB, Palm Oil Mill (POM) requires:</p> <ul style="list-style-type: none"> Information regarding the geolocation of FFB origins; Proof of ownership status, right/claim of the land by grower/smallholder; 	<p>Based on document verification, field visit and interview with weighbridge operator in Perlabian POM, shows in the past 12 months, Perlabian POM only received and processed FFB from company-owned estate. Perlabian POM did not received and process FFB from other party including scheme smallholder or independent smallholders.</p>	<p>Complied</p>

	<ul style="list-style-type: none"> If relevant, valid planting/operational/trading license, or is part of a cooperative which allows the buying and selling of FFB. 	The implementation of traceability and supply chain integrity of company owned FFB processed in Perlabian POM reviewed and verified in Criterion 3.8.	
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.	Based on document verification, field visit and interview with weighbridge operator in Perlabian POM, shows in the past 12 months, Perlabian POM only received and processed FFB from company-owned estate. Perlabian POM did not receive and process FFB from other party including scheme smallholder or independent smallholders.	Complied
Principle 3: Optimise productivity, efficiency, positive impact and resilience Implement plans, procedures and systems for continuous improvement.			
Criteria 3.1: There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.			

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3.1.1	<p>(C) A business or management plan (minimum of three years) is documented and where applicable, includes a jointly developed business case for Scheme Smallholders.</p>	<p>PT Tolan Tiga Indonesia has prepared a business plan for period 2022 – 2030. The business plan indicates the projected production of FFB, CPO and PK; cost of production, revenue and profit estimation.</p> <p>PT Tolan Tiga Indonesia demonstrated independent financial audit report for from Registered Public Accountants Imelda & Partner (License No.308/KM.1/2019) as evidence in Independent Auditor’s Report No.00025/2.1265/AU.1/01/1208-2/1/II/2022 dated 11 February 2022 by Theodorus Bambang Dwi K. A. (Public Accountant License No. AP.1208). Based on the report, the financial statements presents fairly, in all material respects, the financial position of PT Tolan Tiga Indonesia as of December 31st, 2020 and its financial performance and cash flows for the year then ended in accordance with Indonesian Financial Accounting Standards. Financial audit for financial year 2021 has been done in January 2022, the report is still in progress by the public accountant.</p> <p>Available evidence of tax receipt dated 28/09/2021; billing code 125615990019086; NPWP 010018018116001 of PT Tolan Tiga Indonesia; tax object number 122503011611000441; PPB Perkebunan (411313 - land tax) period January – December 2021 for land 84,790,600 m² and building 112,075 m²; amount IDR *,**,357,011. Based on “Surat Pemberitahuan Pajak Terutang” No.00137/670/21/ 116/21 dated 15 April 2021.</p> <p>Perlabian POM: PT Tolan Tiga Indonesia prepared Production Plan 2022-2031</p> <table border="1" data-bbox="960 1088 1796 1367"> <thead> <tr> <th>Year</th> <th>FFB own estate (MT)</th> <th>FFB smallholder* (MT)</th> <th>CPO (MT)</th> <th>PK (MT)</th> </tr> </thead> <tbody> <tr> <td>2022</td> <td>186,613</td> <td>17,210</td> <td>41,913</td> <td>10,264</td> </tr> <tr> <td>2023</td> <td>179,872</td> <td>17,210</td> <td>40,723</td> <td>9,893</td> </tr> <tr> <td>2024</td> <td>179,198</td> <td>17,210</td> <td>40,875</td> <td>9,856</td> </tr> <tr> <td>2025</td> <td>180,155</td> <td>17,210</td> <td>41,400</td> <td>9,909</td> </tr> <tr> <td>2026</td> <td>181,423</td> <td>17,210</td> <td>41,727</td> <td>9,978</td> </tr> </tbody> </table>	Year	FFB own estate (MT)	FFB smallholder* (MT)	CPO (MT)	PK (MT)	2022	186,613	17,210	41,913	10,264	2023	179,872	17,210	40,723	9,893	2024	179,198	17,210	40,875	9,856	2025	180,155	17,210	41,400	9,909	2026	181,423	17,210	41,727	9,978	Complied
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		2027	186,367	17,210	42,864	10,250																										
		2028	186,983	17,210	43,006	10,284																										
		2029	183,113	17,210	42,117	10,071																										
		2030	174,955	17,210	40,240	9,623																										
		2031	168,350	17,210	38,721	9,259																										
		<p><i>*) FFB from smallholder received and sold to external mill – until become certified supply base.</i></p> <p>Tolan Estate has prepared Business Plan 2022-2031:</p> <table border="1"> <thead> <tr> <th>Year</th> <th>FFB production (MT)</th> </tr> </thead> <tbody> <tr><td>2022</td><td>98,024</td></tr> <tr><td>2023</td><td>97,059</td></tr> <tr><td>2024</td><td>101,630</td></tr> <tr><td>2025</td><td>108,381</td></tr> <tr><td>2026</td><td>115,383</td></tr> <tr><td>2027</td><td>120,905</td></tr> <tr><td>2028</td><td>123,177</td></tr> <tr><td>2029</td><td>119,535</td></tr> <tr><td>2030</td><td>112,639</td></tr> <tr><td>2031</td><td>107,308</td></tr> </tbody> </table> <p>Perlabian Estate has prepared Business Plan 2022-2031:</p> <table border="1"> <thead> <tr> <th>Year</th> <th>FFB production (MT)</th> </tr> </thead> <tbody> </tbody> </table>							Year	FFB production (MT)	2022	98,024	2023	97,059	2024	101,630	2025	108,381	2026	115,383	2027	120,905	2028	123,177	2029	119,535	2030	112,639	2031	107,308	Year	FFB production (MT)
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3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available.	<p>Tolan Estate: Replanting Program 2020 – 2030</p> <table border="1"> <thead> <tr> <th>Replanting year</th> <th>Planting Year</th> <th>Total Hectarage (Ha)</th> </tr> </thead> <tbody> <tr> <td>2020</td> <td>-</td> <td>-</td> </tr> <tr> <td>2021</td> <td>-</td> <td>-</td> </tr> <tr> <td>2022</td> <td>-</td> <td>-</td> </tr> <tr> <td>2023</td> <td>1994</td> <td>173.33</td> </tr> </tbody> </table>	Replanting year	Planting Year	Total Hectarage (Ha)	2020	-	-	2021	-	-	2022	-	-	2023	1994	173.33		Complied					
Replanting year	Planting Year	Total Hectarage (Ha)																						
2020	-	-																						
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		2025	1996	161.96																						
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		2030	2001	296.04																						
				2,076.74																						
		<p>Perlabian Estate: Replanting Program 2021 – 2025</p> <table border="1"> <thead> <tr> <th>Replanting year</th> <th>Planting Year</th> <th>Total Hectarage (Ha)</th> </tr> </thead> <tbody> <tr> <td>2021</td> <td>1993, 1996, 2003</td> <td>321.90</td> </tr> <tr> <td>2022</td> <td>1992, 1994, 1996, 2003</td> <td>356.45</td> </tr> <tr> <td>2023</td> <td>1995, 1993</td> <td>220.71</td> </tr> <tr> <td>2024</td> <td>1995</td> <td>190.52</td> </tr> <tr> <td>2025</td> <td>-</td> <td>-</td> </tr> </tbody> </table>					Replanting year	Planting Year	Total Hectarage (Ha)	2021	1993, 1996, 2003	321.90	2022	1992, 1994, 1996, 2003	356.45	2023	1995, 1993	220.71	2024	1995	190.52	2025	-	-		
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2023	1995, 1993	220.71																								
2024	1995	190.52																								
2025	-	-																								
		<p>Review has been done annually in management review meeting to discuss annual realisation and the following year program.</p>																								

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<p>3.1.3</p>	<p>The unit of certification holds management review at planned term according to the scale and nature of the activities undertaken.</p>	<p>PT Tolan Tiga Indonesia has demonstrated:</p> <p>a. "Management Review Report Implementasi Persyaratan Sustainability Perlabian Estate" dated 22 September 2021. The management review consists of:</p> <ul style="list-style-type: none"> - Internal Audit result dated 12-14 July 2021; during Internal audit there are 7 minor findings and 8 observations issued. Status of closing are evaluated in September 2021. - Customer feedback: no significant complaint related to FFB sent for Perlabian POM; - Process performance and product conformity: upkeep and harvesting follows Oil Palm Agriculture Manual; FFB quality follows SOP Engineering Department; - Correction and Prevention: All internal audit findings have been closed. - Follow up from previous Management Review: Has been followed up, as part of internal audit. - Changes affecting Management System: No company policy changes; No changes in procedure and work instruction. - Recommendation for Improvement: Update data/record related to sustainability system fulfilment. <p>b. "Management Review Report Implementasi Persyaratan Sustainability Tolan Estate" dated 24 September 2021. The management review consists of:</p> <ul style="list-style-type: none"> - Internal Audit result dated 21-23 July 2021; during internal audit there were 6 minor findings and 8 observations issued. Status closed as of September 2021. - Customer feedback: no significant complaint related to FFB sent for Perlabian POM; 	<p>Complied</p>
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		<ul style="list-style-type: none"> - Process performance and product conformity: upkeep and harvesting follows Oil Palm Agriculture Manual; FFB quality follows SOP Engineering Department; - Correction and Prevention: All internal audit findings have been closed. - Follow up from previous Management Review: Has been followed up, as part of internal audit. - Changes affecting Management System: No change in company policy; no change in SOP and WI that affecting management system. - Recommendation for Improvement: Update data/record related to sustainability system fulfilment. <p>c. "Management Review Report Implementasi Persyaratan P&C RSPO, ISCC, ISPO Perlabian POM" dated 23 September 2021. The management review consists of:</p> <ul style="list-style-type: none"> - Internal Audit result dated 15-17 July 2021; during internal there were 3 minor findings and 2 observation issued. Status closed as of September 2021. - Customer feedback: no significant complaint related to FFB sent for Perlabian POM; - Process performance and product conformity: upkeep and harvesting follows Oil Palm Agriculture Manual; FFB quality follows SOP Engineering Department; - Correction and Prevention: All internal audit findings have been closed. - Follow up from previous Management Review: Has been followed up, as part of internal audit. - Changes affecting Management System: No company policy changes; No changes in procedure and work instruction. - Recommendation for Improvement: to update data and records related to sustainability system compliance. 	
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<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>Perlabian POM: Continuous improvement plan based on visit of Senior Technical Manager (STM) dated 3 February 2021:</p> <ul style="list-style-type: none"> - Vertical rollers that are not used to be dismantled, completed 16 Feb 2021; - There appears to be a steam leak in the sterilizer no.5 and the floor/pit area of the steriliser is dirty, it needs repair of the leaking liner and periodic cleaning of the pit/pit under steriliser, completed 1 Mar 2021; - Priming tank condensate pump looks rusty, needs to be repainted, completed 4 Feb 2021. <p>Perlabian Estate: Continuous improvement plan based on visit of Vice President Plantation (VPP) dated 5 October 2021:</p> <ul style="list-style-type: none"> - Ensure harvesting round is 3 times per month; - Increase planning and management of FFB transport to comply with budget allocation; - Ensure water run offs & silt pits gets attention during road maintenance program; - Immature Yr-3 – need attention for ablation carried out timely and disposed the waste properly. <p>Tolan Estate: Continuous improvement plan based on visit of Vice President Plantation dated 13 October 2021:</p> <ul style="list-style-type: none"> - Ensure that 3 x harvesting rounds per month are completed;

Complied

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		<ul style="list-style-type: none"> - Consider balancing out replant program to ± 210 Ha/year consistently; - Complete road maintenance program (weather permitting) in preparation for crop increase; - Continue with repair to bridgers, culvert and road crossings before wet season. <p>Continuous Improvement Plan prepared in Capital Expenditure Control 2022 Perlabian POM, consist of: Replacement polishing drum No.2 (body, roller and pondasi); replacement claybath no.2; replacement vibrating screen sweeco for COT no.2; economizer pipe for boiler 26 MT.</p>	
3.2.2	As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat by Certification Body during Annual Surveillance Assessment by using the RSPO metrics template.	The company has reported Annual report using RSPO metric template and submitted to CB. Based on the report, Annual Production Palm Oil is 38,809.76 MT, Annual Production Palm Kernel is 10,013.02 MT.	Complied
Criteria 3.3: Operating procedures are appropriately documented, consistently implemented and monitored.			
3.3.1	(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.	<p>Estate:</p> <p>The procedures documented in "Oil Palm Agricultural Manual" (latest revision in March 2020), where it contains all sub section of the process, such as: Nursery, land clearing, planting in peat soil and mineral soil with zero burning, planting legume cover crops, terracing, upkeep (fertilizer and pesticides, included safe working practices), water level management, riparian and watercourse management, harvesting, replanting and FFB transport. Documented SOP are as follows:</p> <ol style="list-style-type: none"> 1. OPM-01-00; dated 02/10/2017; Biology of Oil Palm. 2. OPM-02-00; dated 02/10/2017; General Information: Oil Palm Nursery. 3. OPM-02-01; dated 02/10/2017; Land Preparation of Oil Palm Nursery – Persiapan Lahan Pembibitan Kelapa Sawit 4. OPM-02-02; dated 02/10/2017; Oil Palm Pre Nursery – Pre Nursery Kelapa Sawit. 	Complied

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		<ol style="list-style-type: none"> 5. OPM-02-03; dated 02/10/2017; Oil Palm Main Nursery – Main Nursery Kelapa Sawit. 6. OPM-03-01; dated 02/10/2017; Survey and Mapping – Survey dan Pemetaan. 7. OPM-03-02; dated 02/10/2017; Land Clearing – Pembersihan Lahan. 8. OPM-03-03; dated 02/10/2018; Land Preparation – Persiapan Lahan. 9. OPM-03-04; dated 02/10/2017; Legume Cover Crop <i>Mucuna bracteata</i> – <i>Mucuna bracteata</i> Kacangan Penutup Tanah 10. OPM-03-05; dated 02/10/2017; Field Planting – Penanaman ke Lapangan. 11. OPM-04-01; dated 02/10/2017; Palm Supplying – Penyisipan Tanaman. 12. OPM-04-02; dated 02/10/2017; Thinning Out and Removing Plant – Penjarangan dan pembongkaran Tanaman. 13. OPM-05-01; dated 02/10/2018; Ablation and Sanitation – Ablasi dan Sanitasi. 14. OPM-05-02; dated 17/07/2019; Harvesting – Panen. 15. OPM-05-03; dated 17/07/2019; FFB and LF Delivery – Pengiriman TBS dan Berondolan. 16. OPM-05-04; dated 18/07/2019; Frond Pruning – Pemangkasan Pelepah 17. OPM-05-05; dated 19/03/2020; Black Bunch Count – Sensus Buah 18. OPM-05-06; dated 02/10/2017; <i>Elaeobius camerunicus</i> Management – Pengelolaan <i>Elaeobius camerunicus</i>. 19. OPM-06-01; dated 19/03/2020; Inorganic Fertiliser – Pupuk Inorganik 20. OPM-06-02; dated 19/03/2020; Organic Fertiliser – Pupuk Organik 21. OPM-06-03; dated 02/10/2017; LSU: Palm Marking – LSU: Penandaan Tanaman. 22. OPM-06-04; dated 02/10/2017; Leaf Sampling Unit (LSU) and Rachis Sampling Unit (RSU) – Pengambilan Sampel. 23. OPM-07-01; dated 20/03/2020; Detection and Censur – Deteksi dan Sensus. 24. OPM-07-02; dated 02/10/2017; Pest Control – Pengendalian Hama. 	
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		<p>25. OPM-07-03; dated 02/10/2017; Disease Control – Pengendalian Penyakit.</p> <p>26. OPM-07-04; dated 17/07/2019; Integrated Pest Management – Pengendalian Hama Terpadu.</p> <p>27. OPM-08-01; dated 20/03/2020; Weed Control – Pengendalian Gulma.</p> <p>28. OPM-09-01; dated 19/02/2019; Water management in Coastal Soil – Pengelolaan Air di Tanah Pesisir.</p> <p>29. OPM-09-02; dated 02/10/2017; Management of Riparian Area – Pengelolaan Riparian Area.</p> <p>30. OPM-09-03; dated 15/07/2019; The Use, Store and Discrad Pesticide – Penggunaan, Penyimpanan dan pemusnahan pestisida.</p> <p>31. OPM-10-01; dated 01/02/2018; Field Quality Control</p> <p>Interviews with the employees (harvester, spraying applicator, fertilizer applicator and EFB applicator) indicates satisfactory level of understanding and implementation in relation to their respective job function.</p> <p>Palm Oil Mill:</p> <p>Perlabian Palm Oil Mill has a set of procedure for processing of oil palm Fresh Frut Bunch into CPO and PK, under “Palm Oil Mill Manual” dated 25 March 2019. The procedures explains all activity from receiving FFB into dispatch of products; Such as:</p> <ol style="list-style-type: none"> 1. POM-01-02; Reception in Perlabian Palm Oil Mill. 2. POM-02-02; Sterilizer in Perlabian Palm Oil Mill. 3. POM-03-02; Threshing in Perlabian Palm Oil Mill. 4. POM-04-02; Pressing in Perlabian Palm Oil Mill. 5. POM-05-02; Clarification in Perlabian Palm Oil Mill. 6. POM-06-02; Kernel Plant in Perlabian Palm Oil Mill. 	
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		<ol style="list-style-type: none"> 7. POM-07-02; Steam Plant in Perlabian Palm Oil Mill. 8. POM-08-02; Power Plant in Perlabian Palm Oil Mill. 9. POM-09-02; Water Treatment in Perlabian Palm Oil Mill. 10. POM-10-02; Effluent Plant in Perlabian Palm Oil Mill. 11. POM-11-02; Storage and Dispatch in Perlabian Palm Oil Mill. 12. POM-12-02; Workshop in Perlabian Palm Oil Mill. 13. POM-13-02; EFB Plant in Perlabian Palm Oil Mill. 14. POM-14-02; Biogas Plant in Perlabian Palm Oil Mill. <p>The procedures are supported by specific Work Instructions, e.g. as follows:</p> <ol style="list-style-type: none"> 1. POM-01-02-W01; Penimbangan Truk FFB dan Berondolan – Weighing FFB truck and loose fruit. 2. POM-02-02-W01; Loading ramp, Pengisian FFB ke dalam Rebusan – Loading ramp, FFB loading into sterilizer; 3. POM-02-02-W02; Pengoperasian Sterilizer – Operating Sterilizer; 4. POM-03-02-W01; Pengoperasian Thresing Machine – Operating Thresing Machine. 5. POM-04-02-W01; Pengoperasian Digester – Operating Digester. 6. POM-04-02-W02; Pengoperasian Screw Press – Operating screw press. 7. POM-04-02-W03; Sand Trap and Vibrating Screen. 8. POM-04-02-W04; Pengoperasian Crude Oil Tank – Operating Crude Oil Tank. 9. POM-05-02-W01; Pengoperasian Continuous Settling Tank – Operating Continuous Settling Tank. 10. POM-05-02-W02; Pengoperasian Clean Oil Tank – Operating Clean Oil Tank. 11. POM-05-02-W03; Pengoperasian Sludge Tank – Operating Sludge Tank. 12. POM-05-02-W04; Pengoperasian Oil Purifier – Operating Oil Purifier. 	
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		<ol style="list-style-type: none"> 13. POM-05-02-W05; Pengoperasian Vacuum Drier – Operating Vacuum Drier. 14. POM-05-02-W06; Pengoperasian Sludge Centrifuge – Operating Sludge Centrifuge. 15. POM-06-02-W01; Operating Depericarper. 16. POM-06-02-W02; Pengoperasian Ripple Mill – Operating Ripple Mill. 17. POM-06-02-W03; Operating Claybath Separator. 18. POM-06-02-W04; Pengoperasian Sawipack Stage 1 & Stage 2 – Operating Sawipack to separate kernel and shell from cracked mixture from ripple mill, through dry separation. 19. POM-06-02-W05; Pengoperasian Kernel Silo Drier – Operating Kernel Silo Drier to reduce moisture < 7%. 20. POM-06-02-W06; Pengoperasian Hydrocyclone – Operating Hydrocyclone to separate kernel and shell from sawipack through wet method; 21. POM-07-02-W01; Operating Cation Exchanger. 22. POM-07-02-W02; Operating Degasifier. 23. POM-07-02-W03; Operating Anion Exchanger. 24. POM-07-02-W06; Operating Thermal Deaerator. 25. POM-07-02-W07; Boiler (Mech 35 MT/hr). 26. POM-07-02-W08; Penanganan Gangguan Sumber Tidak Bergerak Steam Boiler – Handling disturbance from static Steam Boiler. 27. POM-08-02-W01; Operating Genset. 28. POM-09-02-W01; Operating Water Intake. 29. POM-11-02-W01; Pengoperasian CPO Storage Tank – Operating CPO Storage Tank. 30. POM-11-02-W02; Pengoperasian Kernel Bin Storage – Operating Kernel Bin Storage. 31. Analisa FFA CPO No.POM-WI/LAB/001 – Analysing CPO’s FFA; 	
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		<p>32. Analisa FFA Kadar air untuk CPO dispatch No.POM-WI/LAB/002A – Analysing CPO’s moisture for CPO dispatch;</p> <p>33. Analisa kadar kotoran dan kadar air untuk kernel dipatch No.POM-WI/LAB/005A – Analyzing dirt and moisture in kernel for dispatch;</p> <p>34. Pengiriman CPO No.POM-WI/LAB/043 – Delivery of CPO;</p> <p>35. Pengiriman Kernel No.POM-WI/LAB/044 – Delivery of Kernel.</p> <p>A set of work instruction for mill’s workshop, including use of welding equipments, cutting metal, operating lathe machine, operating drilling machine, operating portable grinding machine, operating and maintenance of smoke density meter.</p> <p>A set of work instruction for biogas plant, comprise of: filling in POME into screen chamber and oil grease skimmer, operating of equalization tank, operating of plate heat exchanger and cooling tower, operating of primary clarifier and sludge pit, operating buffer tank, operating anaerobic reactor, operating degassifier, operating Lamella clarifier, operating sludge sump, operating sludge decanter and operating retention pond.</p>	
3.3.2	A mechanism to check consistent implementation of procedures is in place.	The company has established mechanism to check consistent implementation of procedures under SOP OPM-10-01; dated 6 February 2019; Field Quality Control. The objectives of the procedure are to check if the result of work are in accordance with existing procedures; to evaluate the work and keep in accordance with the standards; to use as a reference for making improvements. Inspections are carried out on items related to harvesting, weeding, manuring, pest and disease, replanting and nursery.	Complied
3.3.3	Records of monitoring and any actions taken are maintained and available.	<p>Perlabian POM:</p> <ul style="list-style-type: none"> - Internal Audit result dated 15-17 July 2021; during internal audit there were 3 minor findings and 2 observation issued. Status closed as of September 2021. - Management Review meeting in Perlabian POM dated 23 September 2021. The management review has discussed review internal audit results, customer feedback, process performance and product suitability, status of corrective 	Complied

		<p>and preventive actions, follow-up from previous management review meetings, changes that may affect the system and recommendations for improvement.</p> <ul style="list-style-type: none"> - Monitoring and action taken based on based on visit of Senior Technical Manager (STM) dated 3 February 2021, e.g.: Vertical rollers that are not used to be dismantled, completed 16 Feb 2021; There appears to be a steam leak in the sterilizer no.5 and the floor/pit area of the steriliser is dirty, it needs repair of the leaking liner and periodic cleaning of the pit/pit under steriliser, completed 1 Mar 2021; Priming tank condensate pump looks rusty, needs to be repainted, completed 4 Feb 2021. <p>Perlabian Estate:</p> <ul style="list-style-type: none"> - Internal Audit result dated 12-14 July 2021; during Internal audit there are 7 minor findings and 8 observations issued. Status of closing are evaluated in September 2021. - Management review meeting in Perlabian Estate held on 22 September 2022. Agenda: review internal audit results, customer feedback, process performance and product suitability, status of corrective and preventive actions, follow-up from previous management review meetings, changes that may affect the system and recommendations for improvement. - Monitoring and action taken based on visit of Vice President Plantation (VPP) dated 5 October 2021, e.g. Ensure harvesting round is 3 times per month; Increase planning and management of FFB transport to comply with budget allocation; Ensure water run offs & silt pits gets attention during road maintenance program; Immature Yr-3 – need attention for ablasion carried out timely and disposed the waste properly. <p>Tolan Estate:</p>	
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		<ul style="list-style-type: none"> - Internal Audit performed on 15-17 July 2021; during internal there were 3 minor findings and 2 observation issued. Status closed as of September 2021. - Management review meeting in Tolan Estate held on 23 September 2021. Agenda: review internal audit results, customer feedback, process performance and product suitability, status of corrective and preventive actions, follow-up from previous management review meetings, changes that may affect the system and recommendations for improvement. - Monitoring and action taken based on visit of Vice President Plantation dated 13 October 2021, e.g. Ensure that 3 x harvesting rounds per month are completed; Consider balancing out replant program to ± 210 Ha/year consistently; Complete road maintenance program (weather permitting) in preparation for crop increase; Continue with repair to bridgers, culvert and road crossings before wet season. 	
<p>Criteria 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.</p>			
3.4.1	<p>(C) SEIA in new planting or operation including mills, is conducted independently and participatively by involving the affected stakeholders, inclusive of impact assessment from the smallholder/outgrower scheme (if any). The assessment is to be documented.</p>	<p>No changes of Environmental permit for PT Tolan Tiga Indonesia. PT. Tolan Tiga Indonesia already has an Environmental Permit in form of a Revised Environmental Management Plan (RKL) and Environmental Monitoring Plan (RPL) which has been approved by the Head of the Regional Environmental Impact Management Agency (Bapedalda) of Labuhan Batu Regency in accordance with Letter No.660/326/BPDL-LB/Set/2006 dated July 21, 2006 regarding Approval of Revision of RKL-RPL of PT. Tolan Tiga Indonesia Plantation and Tolan Plantation. In the document, the scope of the study covers an area of 8,479.06 Ha and a Palm Oil Mill (PKS) with a capacity of 60 tons FFB/hour. PT. Tolan Tiga Indonesia has shown an Environmental Permit (formerly an AMDAL / UKL-UPL document) in accordance with statutory provisions. On 16 November 2016, PT. Tolan Tiga Indonesia received an Environmental Feasibility Permit in accordance with the Decree of the Head of the Environmental Agency of Labuhanbatu Selatan Regency No.660/55/BLH/2/2016 concerning</p>	Complied

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		<p>Environmental Feasibility Addendum ANDAL, RKL-RPL for Oil Palm Plantation, Palm Oil Mill, Kernel Crushing Plant 20 Tons/Hour and Mill Effluent into Biogas for power plants (± 3 MW) PT. Tolan Tiga Indonesia in Perlabian Plantation Village, Kampung Rakyat District.</p> <p>On 18 November 2016, PT. Tolan Tiga Indonesia received an Environmental Permit from the Head of the Integrated Licensing and Investment Services Agency, Labuhanbatu Selatan Regency according to Decree No.503/981/BPPTPM-LS/P.I/2016. The scope of this environmental permit on an area of 8,479.06 Ha includes:</p> <ul style="list-style-type: none"> - Oil palm plantation - Palm Oil Mill - Kernel Crushing Plant with a capacity of 20 tons per hour - Processing of POM's Liquid Waste into Biogas for power generation (± 3 MW) 	
3.4.2	<p>For the unit of certification, a SEIA is available and social and environmental management plan and its monitoring have been developed with participation of affected stakeholders.</p>	<p>The company has prepared report on Environmental Management and Monitoring implementation (Laporan RKL-RPL) and submit to the government regularly (per semester).</p> <p>The Management Plan incorporated in the "Rencana Pengelolaan Lingkungan", consist of:</p> <ul style="list-style-type: none"> - Physical-chemical compenent/aspect: soil fertility (monitoring once per annum); water quality (monitoring twice per annum); air quality (monitoring twice per annum); aesthetic (cleanliness). - Social-economy-cultural component/aspects: community welfare; community perception. - Health component: community health, hazardous waste management; 	Complied
3.4.3	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in participatory way.</p>	<p>PT. Tolan Tiga Indonesia has consistently prepared reports on the implementation of Environmental Management and Monitoring periodically every 6 months and reported to the Environmental Office of South Labuhanbatu Regency and through</p>	Complied

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		<p>the electronic reporting application Electronic Reporting Information System (SIMPEL) to the Ministry of Environment and Forestry, namely:</p> <ol style="list-style-type: none"> 1. Report on the Implementation of UKL UPL PT. Tolan Tiga Indonesia Semester I of 2021 has been submitted to the Ministry of Environment (ID TTE SIMPEL: 1625100031-2171 dated 1 July 2021). 2. Report on the Implementation of UKL UPL PT. Tolan Tiga Indonesia Semester II of 2021 has been submitted to the Ministry of Environment (ID TTE SIMPEL: 1645664379-2171 dated 24 February 2022). <p>Based on field observation to Unit of Certification, all parameters described in Management and Monitoring Plan (RKL-RPL) have been implemented.</p>	
Criteria 3.5: A system for managing human resources is in place.			
3.5.1	<p>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>	<p>PT Tolan Tiga Indonesia – Perlabian POM has defined the employment procedures, such as:</p> <p>Recruitment/Selection/Hiring</p> <p>SOP Internal Recruitment (SKU to Acting Field Assistant (FA), Mill Assistant (MA), Office Assistant (OA)) No.HRD-01- 01/01-04-2019/Rev.1 effective date 5 April 2019. The objective to give equal career opportunity for every employee and ensure fulfilment of the required manpower needed. Flow of the procedures:</p> <ul style="list-style-type: none"> - Operating Unit (OU) prepares Staff Employment Request (SER). - General Manager (GM)/Regional Director (RD) approve or reject SER created by Operating Unit. - President Director approve or reject recruitment based on the urgency and needs of the company. - OU Manager select the best candidates from SKU based on SKU Evaluation. - Training Manager conduct assessment program to select candidates. - Human Resources Department Manager approve or reject candidate based on the assessment report. 	Complied

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		<ul style="list-style-type: none"> - Candidate must go through evaluation phase for 6 months as Acting FA/MA/OA. - After the evaluation phase, Manager gives evaluation report to GM/RD. GM/RD then decided whether to promote or decline candidate as staff. <p>SOP External Recruitment (Staff only) No.HRD-01- 02/01-04-2019/Rev.1 effective date 16 April 2020. The objective to ensure the process of recruiting new staff for all position is done and managed systematically, effectively, and efficiently based on the principle of job equality and implemented procedure. Flow of the procedures:</p> <ul style="list-style-type: none"> - Regional Management Office (RMO) or Head of Department prepares Staff Employment Request (SER). - President Director approve or reject SER based on the urgency and needs of the company. - Office Assistant (OA) Recruitment carried out recruitment database except for special reason use advertising. After publishing recruitment advertisement, candidates resume was collected and select best candidates for selection process: written tes, physiological test, interview, medical checkup; choose candidate based on qualification/competence; crete interview with user schedule. - Office Assistant responsible for offering contract and negotiations. - President Director decide to the hiring of staff based on company needs. - Newly hired staff is required to go through monitoring process for 3 months and manager is responsible for the monitoring period. <p>SOP Recruitment for PKWT/Free Labor (Non-Staff) No.HRD-01-03/09-03-2020/Rev.2 effective date 17 March 2020. The objective to ensure the recruitment process for labor force are according to valid procedure and approve manpower plan. Field Assistant (FA), Mill Assistant (MA), Office Assistant (OA) prepare a proposal for recruitment based on available budget, work experience, achievements. Estate Manager or Mill Manager check and approve the proposal.</p>	
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		<p>General Manager (GM)/Regional Director (RD) approve or reject SER created by Operating Unit. Upon approval, Office Head Assistant create work agreement signed by the employee and Estate Manager or Mill Manager.</p> <p>Promotion</p> <p>SOP Promotion to SKU No.HRD-01-04/13-03- 2020/Rev.0 effective date 12 May 2020. The objective to give confirmation and clarify in the process of promotion workers in companies. Estate Manager or Mill Manager prepare proposal for promotion and send to Regional Management Office (RMO). The process of submission attach: SKU evaluation form, list of duties and responsibilities, list of training attended, copy of ID card, copy of driver license. Senior Estate Manager (SEM) or Senior Technical Manager (STM) review and approve proposal. General Manager (GM)/Regional Director (RD) approve or reject proposal created by Operating Unit and forward to Head of Department (HOD). Estate HOD or Technical HOD review and approve the proposal. Upon approval, HOD Human Resources then sign memorandum regarding promotion.</p> <p>SOP Staff Appraisal No.HRD-03-03/17-06- 2020/Rev.2 effective date 24 July 2020. The objective is part of performance management system to produce staff that enable company to achieve its strategic goals. Every year HOD Human Resources will notify all managers to do staff appraisal. OU Manager set each staff target for one year. Later on the target which already set up will be KPI as base of staff appraisal evaluation. Manager will evaluate all the staff with 3 set of staff appraisal form (target achievement 60%, competence 40%, summary target + competence). HOD Human Resources doing a review of overall staff appraisal report made by Office Head Assistant Compensation before approve it. Board of Director approve or reject staff appraisal based on moderation meeting result.</p> <p>Retirement and termination refer to Collective Labour Agreement (PKB) between company and the respective worker union. Company and worker union has collective bargaining agreement, in form of "Perjanjian Kerja Bersama".</p>	
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		<p>PT. Tolan Tiga Indonesia have documented the pay and working condition in accordance to labour law (Undang-undang No.13 tahun 2003 tentang Ketenagakerjaan), as established under "Perjanjian Kerja Bersama (PKB) PT. Tolan Tiga Indonesia dengan Pengurus Serikat Pekerja Tolan Tiga Mandiri (SPTTM)". This document available in Bahasa Indonesia.</p> <ul style="list-style-type: none"> • Salary regulated under Chapter V; • Reasons for dismissal regulated under Chapter XXI; • Period of notice regulated under Chapter XXI; • Pension regulated under Chapter XVI; • Resolution upon industrial dispute on Chapter XXIII; <p>The Collective Labor Agreement (Perjanjian Kerja Bersama) has been registered to Manpower Agency in Labuhanbatu Selatan Regency, as per Degree no: 560/585/NAKER/X/2021 tentang Perpanjangan Masa Berlaku Perjanjian Kerjasama (PKB) PT Tolan Tiga Indonesia Perlabian Estate dengan Serikat Kerja Tolan Tiga Mandiri (SPTTM)", dated 29th October 2021.</p>	
3.5.2	Employment procedures are implemented and records are maintained.	<p>PT. Tolan Tiga Indonesia demonstrated employment procedures related to recruitment, promotion, contract worker recruitment, pension was implemented accordingly.</p> <p>Document recruitment process during ASA 2_2:</p> <ul style="list-style-type: none"> • Request for recruitment coming from Perlabian POM to Engineering Departement, no: 014/PLM/ENG/06-21 dated 21 December 2021. Position request for Processing Station in Perlabian POM. • Interview Evaluation Form (No: HRD-01-02-f-02) dated 22 December 2021, namely Mr Josua Manurung. Purpose: This evaluation is to standardize the recording of information collected during an interview and assist in evaluating dan comparing different applications when interview was completed. • Contract Document: Perjanjian Kerja Waktu Tertentu, dated 1st January 2021. Namely Mr Josua Manurung. The contract valid until 1 year. 	Complied

Criteria 3.6: An Occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	<p>(C) All operational activities risks assessed to identify the H&S issues. Mitigation plans and procedures are documented and implemented.</p>	<p>PT. Tolan Tiga Indonesia has prepared the procedure of risk assessment as per Procedure of Hazard Identification Risk Analysis and Determining Control of OHS, No.OHS-01-01/04-02-2019/Rev.0, dated 12 March 2019.</p> <p>Pelabian POM – the document of risk assessment as per “Daftar Penilaian Risiko K3”, last review on 24th January 2022, the document was covered all activities in POM, such as: Loading ramp station, sterilizer, capstand, pressing, clarification station, kernel plant, enginee room, boiler station, water treatment plan, go down, biogas, emergency respon facilities, office, POME pond.</p> <p>Risk assessment has been socialization to related workers.</p> <p>Tolan Estate -The document of risk assessment under “Penilaian Resiko”, last review on 27th January 2022, the document was covered all activities in estate, such as: spraying, manuring, office activity, workshop, harvesting, pruning, - transport TBS.</p> <p>Mitigation plan of risk assessment has implemented, e.g: in warehouse of fertilizer has sets the maximum height at 2.5 meters for fertilizer bag stacking, fire extinguisher has installed in fuel station and temporary hazardous waste, and all workers has provided PPE.</p>	Complied
3.6.2	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.</p>	<p>PT. Tolan Tiga Indonesia have established an Occupational Health and Safety Policy No.QMM-40-01-P04/27-03/2019/Rev.1 signed by President Director dated 27 March 2019. In point 1 mentioned the company support the implementation of all relevant laws and regulation of Republic of Indonesia and of applicable international agreement and standards relevant to occupational health and safety and at point 2.b mentioned that the company committed to provision of adequate resources for effective implementation of the occupational health and safety (OHS) program and procedure, including strict compliance reviews.</p> <p>OHS Procedure under document “Prosedur Keselamatan dan Kesehatan Kerja (K3)” No. SOP/TDI/06, rev.01 dated 1 February 2019. The document of procedure consisted of:</p>	Complied

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		<ul style="list-style-type: none"> • Procedure of Hazard Identification Risk Analysis Determining Control for OHS – No: OHS-01-01 • Procedure of Hot Work – No. OHS-01-02 • Procedure of Potential Hazard Report – No. OHS-01-03 • Procedure of First Aid – No. OHS-01-04 • Procedure of Confined Space – No. OHS-01-06 • Procedure of Working at Heights – No. OHS-01-06 • Procedure of Gas Pressure Management – No. OHS-01-07 • Procedure of Incident Reporting – No. OHS-01-08 • Procedure of Standard for Installation of Safety Sign – No. OHS-01- 09 • Procedure of Personal Protective Equipment – No. OHS-01-10 <p>PT Tolan Tiga Indonesia – Perlabian POM has also demonstrated the document of OHS Program as per “Program P2K3 – 2022”, prepared on 27th January 2022. The program consists of:</p> <ul style="list-style-type: none"> • OHS meeting -> monthly • Report of OHS performance to Manpower Agency in Labuhanbatu Selatan Regency -> 3 months base • Monitoring of emergency response equipment (APAR, hydrant, sirine) -> monthly • MCU check up -> annually, plan in October 2022. • Special MCU for workers in high-risk area / operations -> 3 months base. <p>Record of implemantetion the OHS program year 2021, such as:</p> <ul style="list-style-type: none"> • Sample record of OHS meeting dated 24th January 2022, agenda: discussion of sick pay day, report of OHS inspection and accident report. The meeting was attended by Mill manager, head assisten, workshop assisten, OHS expert. 	
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		<ul style="list-style-type: none"> • Report of OHS performance period October – December 2021. Has submitted to Dinas Tenaga Kerja dan Transmigrasi Labuhanbartu Selatan Regency. Report number: 05/PLM-02/2022 dated 9th February 2022. • Special Medical Check Up 2021 – for worker in Pelabian, dated 27th October 2021 conducted by Klinik Spesialis Anugerah Ibu, was attended by 51 workers. Inspection report for emergency response equipment dated 5th March 2022. 	
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. Tolan Tiga Indonesia – Perlabian POM has demonstrated document of training programme which is accessible to all staff, workers, scheme smallholders, gender-specific needs, and which covers applicable aspects of P&C Principles, in a form they understand and includes assessment of the training.</p> <p>Program Training 2022, such as:</p> <ul style="list-style-type: none"> • RSPO/ISPO/Supply Chain (new employee). Plan: February 2022; Actual: dated 26 February 2022 was attended by 12 workers. • First Aid Training (all employee). Plan: February 2022; Actual: 9 February 2022 was attended by 40 workers. • MSDS Training (Warehouse, WTP Operator). Plan: February 2022; Actual: 26 February 2022 was attended 28 workers. • Emergency Response Training (all employee). Plan: February 2022; Actual: 9 February 2022 was attended by 40 workers. <p>OHS license “Operator Pesawat Upat”, no: P.10.127.OPK3-PUBT-B.I/II/2020, namely Eri Syahputra – valid until 3rd February 2025.</p>	Complied
3.7.2	Records of training are maintained, where appropriate on an individual basis.	<p>Based on interview with sample of worker at Perlabian Mill and Tolan Estate, the workers obtain the general and specific training and awareness accordance their job desk.</p> <p>Record of training has shown for an individual basis as per document of “Employee Training and Education Record”, e.g:</p>	Complied

		<p>Perlabian POM:</p> <p>a. Marjana Ikhsan (Clarification station)</p> <ul style="list-style-type: none"> • 19/08/2019 : Work Insusction in Clarification • 27/01/2020 : Training on emergency response • 15/08/2020 : Refreshment of Work Induction in Clarification, Risk Assessment training • 01/02/2021 : Training MSDS dan Waste B3 • 22/07/2021 : Training on emergency response, socialization of Company Policies • 21/08/2021 : Refreshment of Work Instruction in Clarification, Risk Assessment training • 09/02/2022 : OHS training <p>Tolan Estate:</p> <p>a. UK Mahendra (Upkeep - supervisor)</p> <ul style="list-style-type: none"> • 31/08/2019 : Equipment callibration Spraying • 04/10/2019 : Equipment callibration Spraying • 22/03/2019 : Training MSDS dan Waste B3 • 06/08/2019 : Equipment callibration Spraying • 28/02/2020 : Equipment callibration Spraying • 12/03/2020 : Equipment callibration Spraying • 09/10/2020 : Equipment callibration Spraying • 11/05/2020 : Training P3K • 21/09/2020 : Training MSDS dan Waste B3 • 30/03/2021 : Equipment callibration Spraying <p>b. Syahrul (Manuring)</p>	
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		<ul style="list-style-type: none"> • 09/01/2019 : Training Manuring Manual • 06/08/2019 : Training Manuring Manual • 13/01/2020 : Training Manuring Manual • 06/07/2020 : Training Manuring Manual • 03/01/2021 : Training Manuring Manual • 14/07/2021 : Training Manuring Manual • 06/01/2022 : Training Manuring Manual <p>c. Rahmansyah (Mechanic - CWS)</p> <ul style="list-style-type: none"> • 04/10/2019 : Training MSDS dan Symbol B3 • 10/10/2019 : Training P3K • 11/05/2020 : Peltihan P3K • 21/09/2020 : Training MSDS dan Symbol B3 	
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 Program 2022 is available including RSPO Supply Chain. Actual training for RSPO Supply Chain in 2022 conducted on 26 February 2022 to employess and 25 February 2022 to contractor. The training subjected to SOP of Supply Chain and Traceability of Palm products (MKT-03-06/04-03-2019/Rev.0). Training attended by relevant personnel including Mill Manager, Office Assistant, Field Assistant, weighbridge clerk, production clerk and security. Training also conducted to Tolan Estate employes on 27 February 2022 as well as Perlabian Estate on 5 February 2022.	Complied
<p>Criteria 3.8: Supply chain requirements for mills.</p> <p>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 RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.</p>	Management decided PT Tolan Tiga Indonesia – Perlabian POM, to implement RSPO Supply Chain Model Identity Preserved. With the implementation of Supply Chain Model Identity Preserved, the POM only received and process FFB from certified company-owned estate. FFB suppliers of Perlabian POM are Perlabian Estate and Tolan Estate.	Complied

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	<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>Perlabian POM implemented the procedure of supply chain and traceability based on SOP Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019/Rev.0 dated 18 March 2019. Procedure completed with the flow diagram of FFB receiving, processing in POM, Receiving and shipping of CPO. Person responsible for implementation of RSPO Supply Chain standard at the POM is the Mill Manager.</p>	
3.8.2	<p>Mass Balance Module 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>Management decided PT Tolan Tiga Indonesia – Perlabian POM, to implement RSPO Supply Chain Model Identity Preserved. With the implementation of RSPO Supply Chain Model Identity Preserved, the POM only received and process FFB from certified company-owned estate. FFB suppliers of Perlabian POM are Perlabian Estate and Tolan Estate. Not applicable.</p>	Not Applicable
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 CPO and PK products that could potentially be produced by Perlabian POM or Forecast is available in this report, please refer table 10 of Section 1. The actual certified product that produced by Perlabian POM is still under the estimated last year. This data volume is available in the surveillance report and unit of certification has own database system to monitor the actual production. The estimate annual tonnage for certified FFB, CPO and PK are available in the Estate and Mill annual production budget for 12 months since last surveillance assessment. The FFB tonnage received from all certified supply bases. Perlabian POM received certified raw material (Fresh Fruit Bunch) from its own estate: Perlabian Estate and Tolan Estate.</p>	Complied
3.8.4	<p>The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.</p>	<p>PT Tolan Tiga Indonesia – Perlabian Palm Oil Mill has been registered in RSPO IT Platform with registered ID number RSPO_PO1000000099.</p>	Complied

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<p>3.8.5</p>	<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> <ul style="list-style-type: none"> a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill's procedures for the implementation of this standard. 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>PT Tolan Tiga Indonesia has a written procedures and/work instruction for ensuring the implementation of RSPO Supply Chain Standard. The procedure are:</p> <ul style="list-style-type: none"> - General Information of Reception (POM-01-00/17-05-2021/Rev.1 - Reception in Perlabian Palm Oil Mill (POM-01-02/17-05-2021/Rev.4 - Weighing in Palm Oil Mill (Lab-01-16/11-05-2021/Rev.0 - Dispatch of CPO and Kernel (Lab-01-17/09-11-2021/Rev.1 - SOP Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019/Rev.0 dated 18 March 2019. Procedure completed with the flow diagram of FFB receiving, processing in POM, Receiving and shipping of CPO. Person responsible for implementation of RSPO Supply Chain standard at the POM is the Mill Manager. The procedure is complete and up to date covering the implementation of all elements in the supply chain requirements, such as: <ul style="list-style-type: none"> a. Sales process, covering from contract approval to delivery of oil palm product (CPO and PK) including information of supply chain mechanism; b. Process at the estates, covers harvesting, FFB and loose fruit delivery include harvesting record and delivery to the Palm Oil Mill; c. Process at Palm Oil Mill covers FFB and loose fruit receiving, identification, production process, delivery of product and recording; d. Evaluation by CB; e. Transportation records; f. Internal control; g. Contractor control. <p>The mill only receives and process certified FFB, therefore the procedure for receiving and processing non-certified FFB is not applicable.</p> <p>The mill has complete and up to date records and reports that demonstrated compliance with the Identity Preserved requirements including training records. Record seen data of FFB received, CPO and PK stock, production, dispatch, OER,</p>	<p>Complied</p>
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		<p>KER, refreshment training of RSPO Supply Chain on 26 February 2022, attended by relevant personnel including Mill Manager, Office Assistant, Field Assistant, weighbridge clerk, production clerk and security.</p> <p>Available records and report that demonstrated compliance with the RSPO supply chain requirement, e.g. Daily Production Figure for 31 December 2021: FFB received month todate is 12,179.72 MT; year todate is 179,192.55 MT. CPO produced month todate is 2,820.797 MT; year todate is 39,737.762 MT. PK produced month todate is 724.275 MT; year todate is 10,322.982 MT. OER month todate is 22.49%; year todate is 22.21%. KER month todate is 5.78%; year todate is 5.76%. CPO dispatched month todate is 2,537.040 MT; year todate is 40,802.170 MT. PK dispatched month todate is 848.270 MT; year todate is 10,245.670 MT.</p> <p>Daily Production Figure for 7 March 2022: FFB received month todate is 2,691.310 MT; year todate is 24,529.96 MT. CPO produced month todate is 568,730 MT; year todate is 5,352.592 MT. PK produced month todate is 147.024 MT; year todate is 1,337.449 MT. OER month todate is 22.00%; year todate is 22.12%. KER month todate is 5.69%; year todate is 5.52%. CPO dispatched month todate is 705.580 MT; year todate is 5,668.94 MT. PK dispatched month todate is 220.850 MT; year todate is 1,365.420 MT.</p> <p>Monthly production report is available containing records of FFB received by Perlabian POM from Perlabian Estate and Tolan Estate. All FFB received by Perlabian POM are certified. The record contains CPO and PK production, dispatch and stocks. Extraction rate of CPO and PK are recorded as well.</p>	
3.8.6	<p>Internal Audit</p> <p>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill;</p> <p>a) Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p>	<p>Procedure for Internal Audit refer to SOP Routine Visit and Internal Audit No.ENC-01-02/04-03-2019/Rev.2 date 18 March 2019.</p> <p>Section 6. Frequency and Timing stipulates the internal audits are conducted at least once a year according to the standards referred to.</p> <p>Section 5.4 Implementation of Routine/Internal Audit Visits stipulates: <i>In general, non-conformities in each of the principle and criteria, rules and requirement of the sustainable system are categorized under major, minor and observation. Such</i></p>	Complied

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	<p>b) Effectively implements and maintains the standard requirements within its organisation.</p> <p>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p>	<p><i>findings must be immediately followed up. The unit manager may undertake to implement corrections and may also plan improvements according to result of internal audit. Recommended improvement must be completed with timeframe. A review of the non-compliance found in a previous internal audit should be made on the next visit.</i></p> <p>The latest internal audit carried out on 24-26 February 2022, against RSPO P&C 2018 Indonesia National Interpretation 2020. The internal auditor assessed Criteria 3.8 related to RSPO SCCS. Corrective action related to internal audit findings have been determined.</p> <p>Latest Management Review related to Supply Chain implementation in Perlabian POM conducted on 4 March 2022. Management review has discussed:</p> <ul style="list-style-type: none"> • Results of internal audits; internal audit in Perlabian POM conducted on 24-26 February 2022, by ENC RMO NS Team, summary of finding and corrective action have been documented in Visit Report ENC Team. • Customer feedback: Based on review of customer feedback conducted by Marketing Department, there is no complaint related CPO and PK quality sold by Perlabian POM. • Process performance and product conformity. FFB processed in Perlabian POM are coming from owned estates. • Status of preventive and corrective actions. All finding discussed in this Management Review have been closed and attached in the minutes of management review. • Follow-up actions from management reviews. Result of previous management review were always discussed, mostly regarding performance, target achievement and FFB quality. • Changes that could affect the management system; revision to the Independent Laboratory manual Lab-01-16 (Weighing in Palm Oil Mill) and Lab-01-17 (Dispatch of CPO and Kernel). 	
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		<ul style="list-style-type: none"> Recommendations for improvement: follow up process to internal audit finding performed consistently. 	
3.8.7	<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 Tolan Tiga Indonesia ensured that certified FFB received are RSPO certified based on the source of FFB. These FFB source are certified under PT Tolan Tiga Indonesia – Perlabian POM certificate (RSPO 555208). Based on interview with weighbridge clerk and FFB receiving station, Perlabian POM only received certified FFB from sustainable source: Perlabian Estate and Tolan Estate.</p> <p>PT Tolan Tiga Indonesia – Perlabian POM has verified the status of the supply base certificate during Internal Audit on 24-26 January 2021, with certificate number RSPO 555208, valid until 16 May 2025.</p> <p>The unit of certification has demonstrated SOP Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019/Rev.0 dated 18 March 2019. Chapter 5.2 of the procedure indicates the Weighbridge Clerk has responsibility to input data and print "Receiving Slip" based on FFB Delivery Note, 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>The procedure explains Operating Unit can coordinate to an evaluation with CB about the quota between the OU and the CB (projected overproduction). During this annual surveillance assessment, Perlabian POM was not over sold the CPO and PK production.</p> <p>The procedure explains control of product non-conformity refer to Marketing Department Manual - SOP Customer Complaint Handling No.MKT-03-02/26-04/2018/rev.1 dated 30 April 2018. The procedure covers returned of all non-conforming product and/or documents. The responsible is Operating Unit Manager and Senior Manager Marketing. Based on audit, Perlabian POM only receive and processed sustainable FFB. There has been no complaint from buyer.</p> <p>Records of purchasing goods in available:</p> <ul style="list-style-type: none"> - Delivery of FFB from Field "SPB" No.PLE/016272 dated 3 Feb 2022 from Perlabian Estate, Division F3, Block F11 (400 bunches), F12 (215 bunches), 	Complied

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		<p>F13 (20 bunches), G10 (329 bunches); planting year 2017, total 964 bunches. Stamp Sustainable Product-IP. Receiving slip/weighbridge ticket No.FFB22001820W; Truck BK 8117 YO; Perlabian Estate dated 3 Feb 2022; D/O No.016272; block ID 17F11, 17F12, 17F13 and 17G10; planting year 2017; total bunches 964; nett weight 7,090 kg. Stamp Sustainable Product-IP.</p> <p>Delivery of FFB from Field "SPB" No.TLE/117995 dated 4 Feb 2022 from Tolan Estate, Division F1, Block C7 (105 bunches), D3 (150 bunches), D4 (96 bunches); planting year 2005 and 2006. Stamp Sustainable Product-IP. Receiving slip/weighbridge ticket No.FFB22001873W; Truck BK 8119 YQ; Tolan Estate dated 4 Feb 2022; D/O No.117995; Block ID 06C07, 05D03 and 05D04; planting year 2005 and 2006; total bunches 351; nett weight 6,830 kg. Stamp Sustainable Product-IP.</p>	
<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); 	<p>The SOP Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019/Rev.0 dated 18 March 2019 regulated that several information required by the standard have to be available in the sales and goods out document. Sales and goods out documents seen are as follows:</p> <p>CSPO</p> <p>There is no sales of RSPO certified CPO since the previous assessment, all certified CPO sold as another scheme.</p> <p>PK.</p> <ul style="list-style-type: none"> - Contract No.2021/LTC-PK/PL/14 between Seller: PT Tolan Tiga Indonesia (address Gedung Forum Nine Lt.10, Suite 1-11, Jl. Imam Bonjol No.9 Petisah Tengah, Medan Petisah, Kota Medan Sumatera Utara - 20112) and Buyer: PT SMART Tbk (address Sinar Mas Land Plaza Menara 2 Lt.30, Jl. MH Thamrin No.51, Gondangdia, Menteng, Jakarta Pusat); dated 25 June 2021; for sales of 600 MT Crude Sustainable Palm Kernel – RSPO IP; Certificate No. RSPO 	<p>Complied</p>

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	<p>g) The quantity of the products delivered; h) Any related transport documentation; i) A unique identification number.</p>	<p>555208.</p> <ul style="list-style-type: none"> - Delivery Order No.2021/LTC-PK/PL/DO/14 dated 1 July 2021, ordering shipment of 600 MT CSPK – RSPO IP, from PT Tolan Tiga Indonesia – Loko PKS Perlabian to buyer PT SMART Tbk. - Dispatch Slip No.PK20000240W, dated 27/07/2021; from PT Tolan Tiga Indonesia – Perlabian POM; product Palm Kernel; quantity 20.81 MT; DO No.2021/LTC-PK/PL/DO/14; Certificate RSPO 555208; Module Sustainable Product IP; Vehicle ID No. BK 8842 BO; CV Sawita Sejahtera Logistic (SSL). - Shipping Announcement, with transaction ID No. TR-74903395-1682 for 409.350 MT CSPK IP; from PT Tolan Tiga Indonesia – Perlabian POM (RSPO_PO1000000099) as Seller to PT SMART Tbk – Belawan KCP (RSPO_PO1000006555) as Buyer. Sample of shipping date 27/07/2021; Contract 2021/LTC-PK/PL/14; Confirmation date 31/07/2021. <p>Detail Information available:</p> <ul style="list-style-type: none"> • The name and address of the buyer: PT SMART Tbk, address Sinar Mas Land Plaza Menara 2 Lt.30, Jl. MH Thamrin No.51, Gondangdia, Menteng, Jakarta Pusat; • The name and address of the seller: PT Tolan Tiga Indonesia, address Gedung Forum Nine Lt.10, Suite 1-11, Jl. Imam Bonjol No.9 Petisah Tengah, Medan Petisah, Kota Medan 20112; • The loading or shipment / delivery date: 27/07/2021 based on Dispatch Slip; • The date on which the documents were issued: Contract on 25 June 2021; DO on 1 July 2021; Dispatch Slip on 27 July 2021; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations): CSPK RSPO IP notation on all mill records; • The quantity of the products delivered: from sampled dispatch slip: 20.81 MT of PK; 	
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		<ul style="list-style-type: none"> Any related transport documentation: vehicle ID No. BK 8842 BO by CV Sawita Sejahtera Logistic (SSL); Supply chain certificate number of the seller: RSPO 555208. A unique identification number: Contract No.2021/LTC-PK/PL/14 (verified on all record). 	
3.8.9	<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</p>	<p>Perlabian POM PT Tolan Tiga Indonesia does not outsources its milling activity to any independent third party.</p> <p>The unit of certification only outsources the transport activity. Transport for RSPO certified sustainable CPO are managed by PT Tolan Tiga Indonesia, whilst transport of RSPO certified PK are managed by the buyer. Transport of certified CPO performed by several contractor. During transport, legal ownership of CSPO are still under PT Tolan Tiga Indonesia. This evident by sales contract that between PT Tolan Tiga Indonesia and the buyer.</p> <p>Contract:</p> <p>a. Addendum No.2021/03 signed on 6 April 2021 for "Perjanjian Pengangkutan PT Tolan Tiga Indonesia dengan CV Angkutan Sahabat No.2019/Angkutan/CPO/PL-SMART/03". CV Angkutan Sahabat issued a statement letter signed by Mr. Gunawan Ruslan, dated 11 January 2018. The statement "CV Angkutan Sahabat is willing to comply with RSPO Supply Chain requirement; Angkutan Sahabat is willing to be audited by certification body if needed".</p> <p>b. Addendum No.2021/02 signed on 6 April 2021 for "Perjanjian Pengangkutan PT. Tolan Tiga Indonesia dengan CV Jasa Sahabat Abadi No.2019/Angkutan/CPO/ PL-SMRT/02". CV Jasa Sahabat Abadi issued a statement letter signed by Mr. Darmin Tanjudjaja, dated 23 March 2018. The statement "CV Jasa Sahabat Abadi is willing to comply with RSPO Supply Chain requirement; CV Jasa Sahabat Abadi is willing to be audited by certification body if needed".</p>	Complied

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	<p>accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</p>	<p>c. Addendum No.2021/04 dated 6 April 2021 for "Perjanjian Pengangkutan PT Tolan Tiga Indonesia dengan CV Sejahtera Abadi No.2019/Angkutan/CPO/PL-SMRT/01". CV Sejahtera Abadi issued a statement letter signed by Mr. Harsono Sukijung, dated 26 February 2019. The statement "CV Sejahtera Abadi is willing to comply with RSPO Supply Chain requirement; CV Sejahtera Abadi is willing to be audited by certification body if needed".</p> <p>d. Addendum No.2021/04 dated 6 April 2021 for "Perjanjian Pengangkutan PT Tolan Tiga Indonesia dengan CV Felindo No.2019/Angkutan/CPO/PL-SMRT/04". Pengangkutan Felindo issued a statement letter signed by Drs. Sutrisno Sukijung, dated 1 March 2019. The statement "Pengangkutan Felindo is willing to comply with RSPO Supply Chain requirement; Pengangkutan Felindo is willing to be audited by certification body if needed".</p> <p>PT Tolan Tiga Indonesia – Perlabian POM has demonstrated SOP Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019/Rev.0 dated 18 March 2019. Section 5.4 Evaluation by Certification Body stipulates the Contractor Control: POM ensures that related contractors in the product supply chain have followed applicable procedures and audited contractors by internal/external if necessary.</p> <p>Means of control by Perlabian POM: "Form Pemeriksaan Truk Kernel", sampled: PK truck No. BK 8842 BO from CV Sawita Sejahtera Logistic (SSL); inspected to carry RSPO certified PK from Perlabian POM to PT SMART Tbk – Belawan KCP, dated 27 July 2021.</p>	
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3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	<p>Perlabian Pom has recorded the names and contact details of all contractors used for transport of certified CPO, as follows:</p> <table border="1" data-bbox="958 443 1919 746"> <thead> <tr> <th>Contractor</th> <th>Contact Person</th> <th>Address</th> </tr> </thead> <tbody> <tr> <td>CV Angkutan Sahabat</td> <td>Mr. Gunawan Ruslan</td> <td>Jl. Petumbukan Dusun III, Jaharun B – Ggalang, Deli Serdang – Sumatera Utara.</td> </tr> <tr> <td>CV Jasa Sahabat Abadi</td> <td>Mr. Darmin Tanjudjaja</td> <td>Jl. Besar Kisaran – Medan km 5 Sidomulyo, Pulo Bandring</td> </tr> <tr> <td>CV Sejahtera Abadi</td> <td>Mr. Harsono Sukijung</td> <td>Jl. Jati No.65 Pulo Brayan Bengkel Kec. Medan Timur, Medan 20239</td> </tr> <tr> <td>CV Felindo</td> <td>Mr. Sutrisno Sukijung</td> <td>Jl. Gunung Krakatau Ujung No. 62, Medan</td> </tr> </tbody> </table>	Contractor	Contact Person	Address	CV Angkutan Sahabat	Mr. Gunawan Ruslan	Jl. Petumbukan Dusun III, Jaharun B – Ggalang, Deli Serdang – Sumatera Utara.	CV Jasa Sahabat Abadi	Mr. Darmin Tanjudjaja	Jl. Besar Kisaran – Medan km 5 Sidomulyo, Pulo Bandring	CV Sejahtera Abadi	Mr. Harsono Sukijung	Jl. Jati No.65 Pulo Brayan Bengkel Kec. Medan Timur, Medan 20239	CV Felindo	Mr. Sutrisno Sukijung	Jl. Gunung Krakatau Ujung No. 62, Medan	Complied
Contractor	Contact Person	Address																
CV Angkutan Sahabat	Mr. Gunawan Ruslan	Jl. Petumbukan Dusun III, Jaharun B – Ggalang, Deli Serdang – Sumatera Utara.																
CV Jasa Sahabat Abadi	Mr. Darmin Tanjudjaja	Jl. Besar Kisaran – Medan km 5 Sidomulyo, Pulo Bandring																
CV Sejahtera Abadi	Mr. Harsono Sukijung	Jl. Jati No.65 Pulo Brayan Bengkel Kec. Medan Timur, Medan 20239																
CV Felindo	Mr. Sutrisno Sukijung	Jl. Gunung Krakatau Ujung No. 62, Medan																
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 unit of certification inform the audit team in case there is changes in the list of FFB, CPO and PK transporter through the RSPO P&C Pre Audit Information checklist.	Complied															
3.8.12	<p>Record keeping</p> <ul style="list-style-type: none"> 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. ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock. 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. iv) For Mass Balance Module, the mill: 	<p>The Palm Oil Mill has implemented RSPO Supply Chain Certification Standard based on procedure SOP Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019/Rev.0 dated 18 March 2019. The procedure explains all aspects of supply chain and traceability scope in PT Tolan Tiga Indonesia: FFB harvesting, harvest recording and delivery to Palm Oil Mill; FFB receiving and processing in Palm Oil Mill, CPO and PK production and reporting; CPO and PK dispatch from Palm Oil Mill and receiving in storage tank for delivery; Shipping instruction and preparation; CPO and PK stock balancing post-shipping.</p> <p>Perlabian POM maintains accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements. Daily Production Figure for 31 December 2021: FFB received month todate is 12,179.72 MT; year todate is 179,192.55 MT. CPO produced month todate is 2,820.797 MT; year todate is 39,737.762 MT. PK produced month todate is 724.275 MT; year todate is 10,322.982 MT. OER month todate is 22.49%; year</p>	Complied															

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	<p>a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</p> <p>b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock).</p>	<p>today is 22.21%. KER month today is 5.78%; year today is 5.76%. CPO dispatched month today is 2,537.040 MT; year today is 40,802.170 MT. PK dispatched month today is 848.270 MT; year today is 10,245.670 MT.</p> <p>Daily Production Figure for 7 March 2022: FFB received month today is 2,691.310 MT; year today is 24,529.96 MT. CPO produced month today is 568,730 MT; year today is 5,352.592 MT. PK produced month today is 147.024 MT; year today is 1,337.449 MT. OER month today is 22.00%; year today is 22.12%. KER month today is 5.69%; year today is 5.52%. CPO dispatched month today is 705.580 MT; year today is 5,668.94 MT. PK dispatched month today is 220.850 MT; year today is 1,365.420 MT.</p> <p>Monthly production report is available containing records of FFB received by Perlavian POM from Perlavian Estate and Tolan Estate. All FFB received by Perlavian POM are certified. The record contains CPO and PK production, dispatch and stocks. Extraction rate of CPO and PK are recorded as well.</p> <p>The SOP Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019/Rev.0 dated 18 March 2019; Section 5.2 Production Process stipulates storage and control of recording related to product sales, transportation until product delivery is stored with minimum period of 5 years.</p> <p>Perlavian POM is able to record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis. For period January to December 2021, FFB processed is 179,156.55 MT; CPO produced is 39,734.14 MT; PK produced is 10,322.98 MT; OER is 22.21%; KER is 5.76%; CPO dispatched is 40,802.17 MT; PK dispatched is 10,245.67 MT; processing hour is 3,301.21 hours; mill throughput is 54.28 ton/hour.</p> <p>Sample of goods out records:</p> <p>CSPO</p> <p>There are no sales of RSPO certified CPO since the previous assessment, all certified CPO sold as another scheme.</p>	
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		<p>PK.</p> <ul style="list-style-type: none"> - Contract No.2021/LTC-PK/PL/14 between Seller: PT Tolan Tiga Indonesia (address Gedung Forum Nine Lt.10, Suite 1-11, Jl. Imam Bonjol No.9 Petisah Tengah, Medan Petisah, Kota Medan Sumatera Utara - 20112) and Buyer: PT SMART Tbk (address Sinar Mas Land Plaza Menara 2 Lt.30, Jl. MH Thamrin No.51, Gondangdia, Menteng, Jakarta Pusat); dated 25 June 2021; for sales of 600 MT Crude Sustainable Palm Kernel – RSPO IP; Certificate No. RSPO 555208. - Delivery Order No.2021/LTC-PK/PL/DO/14 dated 1 July 2021, ordering shipment of 600 MT CSPK – RSPO IP, from PT Tolan Tiga Indonesia – Loko PKS Perlabian to buyer PT SMART Tbk. - Dispatch Slip No.PK20000240W, dated 27/07/2021; from PT Tolan Tiga Indonesia – Perlabian POM; product Palm Kernel; quantity 20.81 MT; DO No.2021/LTC-PK/PL/DO/14; Certificate RSPO 555208; Module Sustainable Product IP; Vehicle ID No. BK 8842 BO; CV Sawita Sejahtera Logistic (SSL). - Shipping Announcement, with transaction ID No. TR-74903395-1682 for 409.350 MT CSPK IP; from PT Tolan Tiga Indonesia – Perlabian POM (RSPO_PO1000000099) as Seller to PT SMART Tbk – Belawan KCP (RSPO_PO1000006555) as Buyer. Sample of shipping date 27/07/2021; Contract 2021/LTC-PK/PL/14; Confirmation date 31/07/2021. 	
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>Extraction rate is applied to provide reliable estimation of CPO and PK produced. For year 2022, the estimated extraction rate from FFB into CPO is 22.50%, whilst from FFB to PK is 5.80%. Based on Daily Production Figure 7 March 2022, actual extraction rate ratios from FFB into CPO is 22.12%, whilst from FFB to PK is 5.52%.</p>	Complied
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	<p>The actual Oil Extraction Rates (OER) and Kernel Extraction Rates (KER) are monitored on daily basis through sounding result and documented in Daily Production Figure. Based on Daily Production Figure dated 31 December 2021 for</p>	Complied

		<p>period January to December 2021, actual OER is 22.21% and KER is 5.76%. Based on Daily Production Figure dated 7 March 2022 for period January to 7 March 2022, actual OER is 22.12% and KER is 5.52%.</p>	
<p>3.8.15</p>	<p>Processing For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	<p>Perlabian POM does not receive any non-certified FFB. Therefore, no non-certified FFB being entered the process, no non-certified CPO and PK being produced, no non-certified product being dispatched. Storage tank for CPO dedicated only for certified palm oil. Silo for PK used to store certified product.</p> <p>Perlabian POM have 4 storage tank, consist of PLST01 (capacity 700 MT), PLST02 (capacity 500 MT), PLST03 (capacity 3,000 MT) and PLST04 (capacity 3,000 MT). Perlabian POM uses PLST01 and PLST03 as the storage tank, whilst PLST02 and PLST04 are used for certified CPO from PT Umbul Mas Wisesa (sister company). Cleaning of storage tank are conducted in 6 month intervals, according to "Rencana Pencucian Oil Storage Tank & Palm Kerbel Bin". Sample of storage tank notes are available, e.g. Storage Tank No.1 dated 19 Agustus 2021, refill on 2 September 2021; No.2 on 7 August 2021, refill on 19 August 2021; No.3 on 30 September 2021, refill on 4 October 2021; No.4 on 21 February 2021.</p> <p>Based on site visit to storage tank station, all CPO received in Perlabian POM has a designated piping system to pump the CPO from UMW POM to the tanks and from the tanks to dispatch station. Verified there are no contamination.</p> <p>There are two weighbridges used in Perlabian POM, both have been calibrated based on:</p> <ul style="list-style-type: none"> - "Surat Keterangan Hasil Pengujian" No.510.3/188/DagInd-Met/KHP/10/2021 dated 12 October 2021 for brand Avery Weigh Tronix; type E1205; S/N 111350583; capacity 40,000 kg; valid until 12 October 2022. - "Surat Keterangan Hasil Pengujian" No.510.3/189/DagInd-Met/KHP/10/2021 dated 12 October 2021 for brand Avery Weigh Tronix; type E1205; S/N 143850136; capacity 40,000 kg; valid until 12 October 2022. 	<p>Complied</p>

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		<p>Note: PT Tolan Tiga Indonesia bought some FFB from partner cooperatives (smallholders), however the FFB is processed by another mill. Based on verified evidence, the basis for payments made to smallholders is the FFB weighing ticket from the recipient mill (PT Gunung Selamat Lestari). Evidence verified:</p> <ul style="list-style-type: none"> - Invoice of FFB sales from Koperasi Produsen Petani Tangungselamat Sejahtera (NPWP 95.970.130.1-116.000) No.118/INV/KPPTS/X/2021; period 28 September – 4 October 2021; date of FFB delivery 30 September 2021; D/O No. 147144; net weight 7,320 kg; FFB price Rp 2,170/kg; cost (fee, transport, weighing) Rp 160/kg; gross earnings Rp **.055.600; cooperative fee Rp 219,600; FFB weighing & loading Rp 292,800; FFB transport Rp 658,800; total deduction Rp 1.171.200; net earnings transferred to cooperative Rp **.055.600. - Weighbridge slip PT Gunung Selamat Lestari (Mill) dated 30 September 2021; truck BK 8746 YE; quantity 423 bunches; net weight 7,320 kg. FFB Delivery note No.193 dated 30 September 2021; truck BK 8746 YE; Blok C0288 (156 bunches), D4510 (206 bunches) and D5810 (61 bunches). 	
3.8.16	<p>Registration of Transactions</p> <ul style="list-style-type: none"> 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. 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>PT Tolan Tiga Indonesia – Perlabian POM is a palm oil mill which takes legal ownership and physically handled RSPO certified sustainable oil palm product (FFB, CSPO and CSPK), therefore the site has been registered in RSPO IT Platform with ID number RSPO_PO1000000099.</p> <p>As a Palm Oil Mill which takes legal ownership and physically handled RSPO certified sustainable oil palm product, Perlabian POM has made Shipping Announcement for certified CPO and PK sold.</p> <p>For example:</p> <ul style="list-style-type: none"> a. Shipping Announcement, with transaction ID No. TR-74903395-1682 for 409.350 MT CSPK IP; from PT Tolan Tiga Indonesia – Perlabian POM (RSPO_PO1000000099) as Seller to PT SMART Tbk – Belawan KCP (RSPO_PO1000006555) as Buyer. Sample of shipping date 27/07/2021; Contract 2021/LTC-PK/PL/14; Confirmation date 31/07/2021. b. Shipping Announcement, with transaction ID No. TR-2acb9e31-93f5 for 257.17 MT CSPK IP; from PT Tolan Tiga Indonesia – Perlabian POM 	Complied

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		<p>(RSPO_PO100000099) as Seller to PT Ivo Mas Tunggal – Lubuk Gaung (RSPO_PO1000006558) as Buyer. Sample of shipping date 25 Nov 2021; Contract 2021/LTC-PK/PL/23; Confirmation date 12 Jan 2022.</p> <p>During this assessment period, Perlabian POM does not sold any RSPO certified CPO. All CSPO are sold as another certification scheme. Therefore, Perlabian POM performed "Remove" in the RSPO IT Platform as well as for CSPO withdrawn from transport deduction:</p> <ul style="list-style-type: none"> • Transaction ID: ST-TR-a3a55ffd-6432; dated 30 June 2021; Product CSPO; Stock Transaction Type: Remove from certified stock; Transaction volume: 499.11 MT. • Transaction ID: ST-TR-526ea2f1-c52c; dated 31 Jul 2021; Product CSPO; Stock Transaction Type: Remove from certified stock; Transaction volume: 151.06 MT. • Transaction ID: ST-TR-437e8a3b-0aa1; dated 31 Aug 2021; Product CSPO; Stock Transaction Type: Remove from certified stock; Transaction volume: 249.71 MT. 	
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>	<p>The procedure for claims is stated in SOP Supply Chain and Traceability of Palm Products (MKT-03-06/04-03-2019/Rev.0) dated 18 March 2019. The mill only makes claims on RSPO Certified product in compliance with RSPO Rules on Market Communications and Claims. Statement of RSPO certified and Identity Preserved are only stated in sales documents of RSPO certified product.</p>	Complied
General corporate communications			
4.1	<p>A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.</p>	<p>PT Tolan Tiga Indonesia is a subsidiary of RSPO registered member, SIPEF Group. SIPEF Group, is highlighting its commitment to the principles of RSPO – therefore making an off product communication. The corporate communication of SIPEF Group can be seen in the corporate website: www.sipef.com</p>	Complied
4.2	<p>In corporate communications a member is allowed to:</p> <ul style="list-style-type: none"> • Display its RSPO membership status 	<p>Corporate communication in SIPEF Group website:</p> <ul style="list-style-type: none"> • No, SIPEF did not display its RSPO membership status. 	Complied

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	<ul style="list-style-type: none"> • 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>	<ul style="list-style-type: none"> • Not in direct manner. SIPEF made a link to RSPO website. • in direct manner. In the website, SIPEF wrote “We believe in a landscape approach to new oil palm developments, guided by the methodology endorsed by the RSPO”. • No. SIPEF did not state their history with regards to the RSPO. <p>Use of RSPO Trademark to promote its membership of the RSPO: No, SIPEF 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.	No, SIPEF 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.	Complied
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member’s own products.	No, SIPEF did not display its RSPO membership status. It is clear that the statement are clear and did not mislead consumers or other stakeholders as to the certified content of oil palm products in the SIPEF’s own products.	Complied
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	No, SIPEF Group did not display the RSPO Corporate Logo in the website as well as in the correspondence letter.	Complied
Business to business communications			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	PT Tolan Tiga Indonesia – Perlabian POM stated in sales documents, e.g. Sales Contract, Delivery Order and Despatch Slip that the product they sold is RSPO Certified CPO or PK model IP.	Complied

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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.	PT Tolan Tiga Indonesia – Perlabian POM stated in sales documents, e.g. Sales Contract, Delivery Order and Despatch Slip that the product they sold is RSPO Certified CPO or PK model IP.	Complied
5.3	<p>Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options:</p> <p>a) If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer’s SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.</p> <p>b) If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p>	<p>PT Tolan Tiga Indonesia – Perlabian POM is not a distributor or wholesaler, the site is a Palm Oil Mill that process FFB into CPO and PK.</p> <p>Not Applicable.</p>	Not Applicable
5.4	<p>A certified member can provide information to its customers detailing the presence of certified palm oil contained within a product even if it is not eligible for a product-specific under RSPO rules. The end product must not be labelled as certified or sold in such a way that implies RSPO certification.</p> <p>For example, a retailer or food service company may require a breakdown of all palm based ingredients within an end product and the certified status of each. This information may be provided by a certified RSPO member without constituting a product-specific claim.</p>	<p>PT Tolan Tiga Indonesia – Perlabian POM is a Palm Oil Mill that process FFB into CPO and PK. The site sold its product in bulk, no product label attached.</p> <p>Not applicable.</p>	Not Applicable

Business to consumer communication			
6.1	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.	There is no business to consumer communication as this is an upstream activity certification.	Not Applicable
6.2	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.	There is no business to consumer communication as this is an upstream activity certification.	Not Applicable
6.3	When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.	There is no business to consumer communication as this is an upstream activity certification.	Not Applicable
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	There is no business to consumer communication as this is an upstream activity certification.	Not Applicable
6.5	Members shall not communicate to consumers' information about their suppliers' RSPO membership status.	There is no business to consumer communication as this is an upstream activity certification.	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.	There is no business to consumer communication as this is an upstream activity certification.	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.	There is no business to consumer communication as this is an upstream activity certification.	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	There is no business to consumer communication as this is an upstream activity certification.	Not Applicable

	<p>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.</p>		
<p>MODULE A – IDENTITY PRESERVED & SEGREGATED SPECIFIC RULES</p>			
<p>Certified oil palm content (IP)</p>			
	<p>For IP, 95% or above of the oil palm content must be RSPO IP-certified.</p>	<p>The Certified IP volume that can be sold is only the volume requested in the PalmTrace. Hence the CPO volume sold under IP model is considered 100% content.</p>	<p>Complied</p>
	<p>For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.</p>	<p>Perlabian POM use IP for RSPO supply chain certification module.</p>	<p>Not Applicable</p>
	<p>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 volume of non-certified oil palm products must be covered by the purchase of RSPO Credits of equivalent volume.</p>	<p>The Certified IP volume that can be sold is only the volume requested in the PalmTrace. Hence the CPO volume sold under IP model is considered 100% content.</p>	<p>Not Applicable</p>

Labelling and trademark (IP)		
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> • RSPO trademark which includes the tag 'CERTIFIED' or • RSPO trademark which includes the tag 'This product contains certified sustainable palm oil'. Wherever a 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 4pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack. 	<p>There is no product partial claims</p> <p style="text-align: right;">Not Applicable</p>
Messaging (IP)		
	<p>Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements:</p> <ul style="list-style-type: none"> • The oil palm products contained in this product have been certified to come from RSPO sources. www.rspo.org • By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: www.rspo.org • RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. www.rspo.org • Certified sustainable oil palm products can be traced back to RSPO-certified mills and plantations. www.rspo.org • The entire supply chain is monitored by independent, RSPO-accredited auditors. www.rspo.org 	<p>There is no product partial claims</p> <p style="text-align: right;">Not Applicable</p>

	<ul style="list-style-type: none"> • RSPO-certified sustainable palm oil has been produced to stringent environmental and social criteria. www.rspo.org • References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records. 		
<p>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.</p>			
<p>Criteria 4.1: The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.</p>			
<p>4.1.1</p>	<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>PT. Tolan Tiga Indonesia established Company Policy on Human Rights No.QMM-40-01-P02/27-03-2019 signed by President Director on 27 March 2019. The policy stated PT. Tolan Tiga Indonesia recognises that human rights are universal and apply to all, without any form of distinction. PT. Tolan Tiga Indonesia supports the implementation of the International Bill of Human Rights, and of the ILO Declaration on Fundamental Principles and Rights at Work, as they are transcribed into the laws and regulation of Republic of Indonesia. Charges of violation of human rights where substantiated will result in disciplinary action up to and including dismissal, and may also lead to legal action.</p> <p>In Perlavian POM the equal employment opportunity policy has been disseminated to 19 workers from Laboratory, Office, Godown (laboratory attendant, weighbridge operator, office helper, driver, godown, biogas plant, sortation) dated 19 February 2020.</p> <p>During weekly meeting, the human rights policy also disseminated to security service – PT. SSI, sampled on 2 September 2020.</p> <p>In Perlavian Estate the record of company’s dissemination on human rights policy on 17 February 2022. The socialization attended by 17 workers from Division I (harvesters, harvesting mandors, tally clerk); 16 workers from Division II (harvesters, harvesting mandors); on 11 February 2022 for 11 workers from Division III (sprayers and mandors);</p>	<p>Complied</p>

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		<p>In Tolan Estate, the socialization of this policy has conducted regularly. For example, sighted the record of company’s policy on human rights socialization on 10 January 2022. The socialization attended by 43 workers from Division I (harvesters, P&D census, waterman, baby sitter, harvesting mandors) and 34 contract workers/PKWT (loose fruit collectors, gardener); 34 workers from Division II (harvesters, spraying team, harvesting mandors); 83 workers from Division III (harvesters, harvesting mandors, tally clerk, manuring); 39 workers from Division IV (harvesters, harvesting mandors); 41 workers from Division V (harvesters, waterman, baby sitter, harvesting mandors); 48 workers from Division Transport (tractor driver, dump truck driver, quality controller, helper dump truck, carpenter, electrician, school bus driver);</p> <p>During interview with 3 harvesters, 2 sprayers and 2 fertilizer applicators in Tolan Estate, they understand the principle for protect human rights policy as to freely hold religion and to have religious activity such as during “Sholat Jumat”.</p>	
4.1.2	The unit of certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations.	<p>According information gathered during stakeholder consultation with representative of Meranti Village, Air Merah Village, PT. Solusi Sekuriti Indonesia (security services)</p> <p>During the audit, through the public consultation with village head surrounding the company areas, local government, NGO’s and local journalist obtained information that there was a record of land claims between the company and Kelompok Tani Bersatu (KTB).</p> <p>However, certificate holder did not use violence approach to handle all case related to their operational activity. There is no evidences of mercenaries and paramilitaries usage in their operations.</p>	Complied
Criteria 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.			
4.2.1	(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where	Based on stakeholder consultation with surrounding communities in Air Merah Village, Meranti Village, Government officials of Plantation Service in Labuhanbatu Selatan Regency audit team gather information the plantation developed since	Complied

	<p>requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p>	<p>Dutch Colonial Era. There was no land compensation because the concession operating since Dutch Colonial Era.</p> <p>From document verification and statement from stakeholders, PT. Tolan Tiga Indonesia do not conduct new land clearing. However, the company prepared procedure for conflict resolutions:</p> <ol style="list-style-type: none"> a. Mechanism for land compensation prior to new land clearing under "Land and Planting Compensation inside Izin Lokasi of The Company No.LCA-01-01/23-09-2020/Rev2", signed by management 28 September 2020. b. Mechanism for resolving conflict caused by illegal encroachment in HGU area "Illegal Planting and Building Owned by Third Party Inside HGU of The Company No.LCA-01-03/01-02-2020/Rev 0", signed by management 18 February 2020. c. Mechanism for conveying complaint and grievance under "Grievance Procedure No.IAD-01-08/22-01-2020/Rev.0" signed by President Director 30 January 2020. d. Company established "Whistle Blower Policy No.QMM-40-01-P16/14-01-2019/Rev. 1", signed by management on 14 January 2019, stating; <ul style="list-style-type: none"> - PT. Tolan Tiga Indonesia guarantees the confidentiality of the report and the information it contains as well as the anonymity of the whistleblower or sender, even if the report is subsequently proven to be incorrect or unfounded. - Any kind of threat, retaliation, penalty or discrimination against the whistle blower or the reported party-or anyone who has participated in the investigation into the validity of the report-will not be tolerated. PT. Tolan Tiga Indonesia reserves the right to take the appropriate actions against anyone who retaliates or threatens to retaliate against whistle blowers who have submitted report accordance with this policy. <p>It is understood that the company may take appropriate disciplinary and/or legal measures to protect its right, assets and reputation against anyone who. In bad faith, has made false, unfounded or opportunistic report and/or has made reports</p>	
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		for the sole purpose of defaming, slandering or causing damage to the reported party or to other parties mentioned in the report.	
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.	Company has policy and mechanism to resolve dispute/conflict/claim/grievance with internal and external parties. The mechanism related to dispute/conflict/claim/grievance resolution available in Bahasa Indonesia, understood by majority of community in and around company concession. Specific for company policy was printed in Bahasa Indonesia and English. To anticipate stakeholders, who cannot understand Bahasa Indonesia or illiterate – company has conduct direct socialization related to mechanism for dispute/conflict/claim/grievance; including information on conveying dispute/conflict/claim/grievance; until mechanism for land compensation. Based on phone interview with sample of stakeholders contacted, there is no grievance nor complaint raise in last 12 months.	Complied
4.2.3	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.	Based on phone interview with sample of stakeholders contacted, there is no grievance nor complaint raise in last 12 months.	Complied
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.	Based on phone interview with sample of stakeholders contacted, there is no grievance nor complaint raise in last 12 months.	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.	Contributions to community development are implemented by Certificate Holder to affected surrounding local communities. All contributions are recorded and documented in "Laporan Pelaksanaan Penilaian Aspek Dampak Sosial PT. Tolan Tiga Indonesia, Kabupaten Labuhanbatu Selatan Tahun 2021". In 2021, contributions to community development are based on result of consultation through spreads of questionnaire. Total respondent is 40 persons. 15 people	Complied

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		<p>covers from surrounding communities of Tolan Estate and 25 people covers from surrounding communities of Perlabian Estate.</p> <p>Sample of questionnaire Tolan Estate verified by auditor are Meranti village: Mrs. Syari Handayani (farmer), Mr. Edi Priono (farmer), Mrs. Nanik (housewife).</p>	
<p>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.</p>			
<p>4.4.1</p>	<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><i>There is no change information since previous assessment.</i></p> <p>Based on legal document verification, audit team gather information all concession under HGU of PT. Tolan Tiga Indonesia was obtained from government which was "Hak Barat (Hak erfpahct)" conversion to SIPEF Group – as documented under</p> <ol style="list-style-type: none"> 1. "Agreement between Government of Indonesia and <i>Societe Internationale de Plantations Et de Finance S.A-SIPEF</i> (Belgium)" dated 29 April 1968 for concession of 3,000 Ha and 7,031.27 Ha. 2. The landuse decree from Head of Land Use Inspection in Sumatera Utara Province, dated 18 April 1970; 3. The land survey result "Risalah Pemeriksaan Tanah dari Panitia B No.40/PPT/B/69" dated 17 December 1968 and "Risalah Pemeriksaan Tanah dari Panitia B No.48/PPT/B/71" dated 7 December 1971; <p>The current legal ownership of the land documents of PT. Tolan Tiga Indonesia was extension of HGU "Izin Perpanjangan Hak Guna Usaha (HGU)" issued by "Menteri Negara Agraria/Kepala BPN" through letter:</p> <ol style="list-style-type: none"> 1. Decree letter from Minister of Land "Surat Keputusan Menteri Negara Agraria/Kepala Badan Pertanahan No.SK 80/HGU/BPN/97, tanggal 16 Juli 1997, dengan luas 6,042.44 Ha, yang berlokasi di Desa Kebun Perlabian, Kecamatan Kampung Rakyat, Kabupaten Labuhanbatu, Provinsi Sumatera Utara". The HGU for PT. Tolan Tiga Indonesia for 6,0244.44 Ha located in Kebun Perlabian Village, Kampung Rakyat District, Kabuhanbatu Regency, Sumatera Utara Province, valid up to 31 December 2023. This decree was extension upon "Izin HGU No. 1 /Kebun Perlabian" expired on 31 December 	<p>Complied</p>

		<p>1998. Based on the decree letter, subsequently issued with HGU certificate by "Kantor Pertanahan Kabupaten Labuhanbatu" in "Sertifikat HGU No.02 tertanggal 17 September 1997 dengan luas 6,042.44 Ha sesuai dengan Surat Ukur No. 2868/1997 tertanggal 17 September 1997" – HGU certificate No.2 for concession of 6,042.44 Ha as per survey letter No.2868/1997 dated 17 September 1997.</p> <p>2. Decree letter from Minister of Land "Surat Keputusan Menteri Negara Agraria/Kepala Badan Pertanahan No.SK 86/HGU/BPN/97, tanggal 23 Juli 1997, dengan luas 2,436.62 Ha, yang berlokasi di Desa Tolan Pekan, Kecamatan Kampung Rakyat, Kabupaten Labuhanbatu, Provinsi Sumatera Utara". The HGU for PT. Tolan Tiga Indonesia for 2,436.62 Ha located in Kebun Perlabian Village, Kampung Rakyat District, Labuhanbatu Regency, Sumatera Utara Province, valid up to 30 June 2024. This decree was extension upon "Izin HGU No.1 /Tolan Pekan" expired 30 June 1998. Based on the decree letter, subsequently issued with HGU certificate by "Kantor Pertanahan Kabupaten Labuhanbatu" in "Sertifikat HGU No.02 tertanggal 17 September 1997 dengan luas 2,436.62 Ha sesuai dengan Surat Ukur No. 2869/1997 tertanggal 17 September 1997". HGU certificate No.2 for concession of 2,436.62 Ha as per survey letter No.2868/1997 dated 17 September 1997.</p> <p>The total HGU for PT. Tolan Tiga Indonesia of 8,479.06 Ha, whereby divided into 2 estates i.e. Perlabian Estate and Tolan Estate. Based on social impact assessment and environmental impact assessment shows no indication of presence of indigenous people or indigenous land inside HGU area of PT. Tolan Tiga Indonesia.</p> <p>Since the previous assessment, Unit of Certification does not have any compensation process to the surrounding community. All of the land tittle is cultivated and managed by Tolan Tiga Indonesia are came from Dutch Concession, thus there is no new land acquisition.</p>	
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<p>4.4.2</p>	<p>Copies documents evidencing agreement- making processes and negotiated agreements detailing the FPIC process are available and include:</p> <p>4.4.2a Evidence that a plan has been developed through consultation and discussion held in good faith with all affected groups within the community, with specific assurances that vulnerable, minority and gender groups are asked for their opinions, and that information has been provided to all affected groups, including in it information about the steps taken to involve them in decision making.</p>	<p>Based on legal document verification, audit team gather information all concession under HGU of PT. Tolan Tiga Indonesia was obtained from government which was "Hak Barat (Hak erfpahct)" conversion to SIPEF Group – as documented under "Agreement between Government of Indonesia and <i>Societe Internationale de Plantations Et de Finance S.A-SIPEF</i> (Belgium)" dated 29 April 1968.</p> <p>Through the document verification and statement from government officials, audit team gather information PT. Tolan Tiga Indonesia did not conduct any new land clearing since November 2005. However, company established procedure for settling land compensation if new land clearing is necessary for plantation expansion. The procedure established in "Land and Planting Compensation inside Izin Lokasi of The Company No.LCA-01-01/23-09-2020/Rev.2" signed by management on 28 September 2020.</p> <p>Based on document evaluation, the procedure explains flow process to land clearing started from planning, inventory land, land measurement involving village government and witnessed by neighboring entity, prepare the compensation administration (agreement for land compensation, landowner data, legal ownership of the land, statement letter the land free of conflict, etc.), review from Regional Management Office, approval from Head Office Medan, record of implementation land compensation.</p>	<p>Complied</p>
	<p>4.4.2b Evidence that the unit of certification has respected communities to give or withhold their consent to the operations at the time that these decisions were taken;</p>	<p>Based on legal document verification, audit team gather information all concession under HGU of PT. Tolan Tiga Indonesia was obtained from government which was "Hak Barat (Hak erfpahct)" conversion to SIPEF Group – as documented under "Agreement between Government of Indonesia and <i>Societe Internationale de Plantations Et de Finance S.A-SIPEF</i> (Belgium)" dated 29 April 1968.</p> <p>Based on document verification and statement from government officials, audit team gather information PT. Tolan Tiga Indonesia did not conduct any new land clearing since November 2005. However, company established procedure for settling land compensation if new land clearing is necessary for plantation expansion. The procedure established in "Land and Planting Compensation inside Izin Lokasi of The Company No.LCA-01-01/23-09-2020/Rev.2" signed by</p>	

		<p>management on 28 September 2020.</p> <p>As explained under indicator 4.4.1 shows:</p> <ul style="list-style-type: none"> • Company has established procedure to be use as guideline to land compensation and complaint/land claim. • Based on document verification, public consultation and field visit shows within PT. Tolan Tiga Indonesia, there was no new land clearing since November 2005. <p>PT. Tolan Tiga Indonesia received complaint/land claim from Kelompok Tani Bersatu, Dusun Meranti. The company and the land claimant are in process for land claim resolution with facilitation and mediation. This shows certificate holder respected communities to give or withhold their consent to the operations. The document and record to demonstrate to this case reported under indicator 4.2.3.</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 legal document verification, audit team gather information all concession under HGU of PT. Tolan Tiga Indonesia was obtained from government which was "Hak Barat (Hak erfpahct)" conversion to SIPEF Group – as documented under "Agreement between Government of Indonesia and <i>Societe Internationale de Plantations Et de Finance S.A-SIPEF</i> (Belgium)" dated 29 April 1968.</p> <p>Based on document verification and statement from government officials, audit team gather information PT. Tolan Tiga Indonesia did not conduct any new land clearing since November 2005. However, company established procedure for settling land compensation if new land clearing is necessary for plantation expansion. The procedure established in "Land and Planting Compensation inside Izin Lokasi of The Company No.LCA-01-01/23-09-2020/Rev.2" signed by management on 28 September 2020.</p> <p>As explained under indicator 4.4.1 shows:</p> <ul style="list-style-type: none"> • Company has established procedure to be use as guideline to land compensation and complaint/land claim. 	

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		<ul style="list-style-type: none"> Based on document verification, public consultation and field visit shows within PT. Tolan Tiga Indonesia, there was no new land clearing since November 2005. <p>PT. Tolan Tiga Indonesia received complaint/land claim from Kelompok Tani Bersatu, Dusun Meranti. The company and the land claimant are in process for land claim resolution with facilitation and mediation. This shows certificate holder respected communities to give or withhold their consent to the operations. The document and record to demonstrate to this case reported under indicator 4.2.3.</p>	
4.4.3	(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).	Based on legal document verification, audit team gather information all concession under HGU of PT. Tolan Tiga Indonesia was obtained from government which was "Hak Barat (Hak erfahct)" conversion to SIPEF Group – as documented under "Agreement between Government of Indonesia and <i>Societe Internationale de Plantations Et de Finance S.A-SIPEF</i> (Belgium)" dated 29 April 1968.	Complied
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 document verification and statement from government officials, audit team gather information PT. Tolan Tiga Indonesia did not conduct any new land clearing since November 2005. However, company established procedure for settling land compensation if new land clearing is necessary for plantation expansion. The procedure established in "Land and Planting Compensation inside Izin Lokasi of The Company No.LCA-01-01/23-09-2020/Rev.2" signed by management on 28 September 2020.	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.		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, stakeholder interview and field visit show that during audit by BSI, there is no indication of land conflict with other party including with local community. However, audit team noted there is land claim by Kelompok Tani Bersatu, Dusun Meranti in 2014-2020. PT. Tolan Tiga Indonesia documented all land claim resolution process, including third party mediation/facilitation.	Complied
		The document verification upon the land claim shows the kelompok/claimant was not informing the location of land subject to claim, so cannot identified the object. Upon the case, path chosen is through court of law (reported in chronological order under indicator 4.2.3).	

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		PT. Tolan Tiga Indonesia has conducted social impact assessment and environmental impact assessment – reported under 4.3.1 and 4.4.1. All document related to environmental impact assessment report and social impact assessment report, including its monitoring reports is publicly available document, and written in Bahasa Indonesia.	
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.	Based on legal document review and stakeholder consultation, audit team gather information the area of PT. Tolan Tiga Indonesia was developed since Dutch Colonial Era, and no new land clearing for oil palm plantation since November 2005.	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.	Based on document verification upon Environmental Impact Evaluation year 2006 “Kajian Dampak Lingkungan (Revisi Dokumen RKL-RPL tahun 2006)” shows no identified land use by indigenous people or other land use inside HGU area of PT. Tolan Tiga Indonesia. In year 2009, PT. Tolan Tiga Indonesia carried out HCV Identification Assessment and in year 2010, company carried out Social Impact Assessment; based on verification of both documents shows no identified land use by indigenous people or other land use inside HGU area of PT. Tolan Tiga Indonesia.	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.	Based on stakeholder consultation with Plantation Services and Environmental Services – Dinas Perkebunan and Dinas Lingkungan Hidup Labuhanbatu Selatan Regency; interview with surrounding communities, audit team gather information that no identified land use by indigenous people or other land use inside HGU area of PT. Tolan Tiga Indonesia. Based on document verification and statement from government officials, audit team gather information PT. Tolan Tiga Indonesia did not conduct any new land clearing since November 2005. However, company established procedure for settling land compensation if new land clearing is necessary for plantation expansion. The procedure established in “Land and Planting Compensation inside	Complied
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		Complied

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	provisioning options are considered. There is transparency of land allocations process.	Izin Lokasi of The Company No.LCA-01-01/23-09-2020/Rev.2" signed by management on 28 September 2020.	
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.		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.		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 cases of smallholders benefitting from agrarian reform or anti-drug programmes.	Concession of PT Tolan Tiga Indonesia established since Dutch Era 1921 and acquired by Indonesia government in 1961/1962. Unit of Certification obtained from government with status of "Hak Barat (Hak erfpacht)" conversion to SIPEF Group – as documented under "Agreement between Government of Indonesia and <i>Societe Internationale de Plantations Et de Finance S.A-SIPEF</i> (Belgium)" dated 29 April 1968. No new planting nor expansion area within managed area of Certificate Holder.	Complied
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation.		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.	Based on legal document verification, audit team gather information all concession under HGU of PT. Tolan Tiga Indonesia was obtained from government which was "Hak Barat (Hak erfpahct)" conversion to SIPEF Group – as documented under "Agreement between Government of Indonesia and <i>Societe Internationale de Plantations Et de Finance S.A-SIPEF</i> (Belgium)" dated 29 April 1968. A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is covers within Land	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.		Complied

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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).	and Planting Compensation Inside Location Permit of The Company No. LCA 01-01/01-02-2019/Rev 0, dated 18 February 2019.	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>During ASA-2.2 2022, unit of certification has no land expansion, new planting or land compensation process from the certified area. The compensation process already finished since 2012 (prior obtaining Land Title in 2013).</p> <p>FPIC process starting from socialization from the company, ground check measurement (survey/mapping) with relevant parties and refer to land statement/title. Land compensation process completed after all the land is clear and clean legally. During the FPIC process, there is no forced by the company, and land compensation agreement is legal, fair and transparent.</p> <p>However, unit of certification has had FPIC mechanism related land compensation, which described in Land and Planting Compensation Inside Location Permit of The Company No. LCA 01-01/01-02-2019/Rev 0, dated 18 February 2019.</p> <p>In other side, during interview with Village Head of Air Merah and Meranti, it is informed that no customary rights/land within PT. Tolan Tiga Indonesia.</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.	Based on legal document verification, audit team gather information all concession under HGU of PT. Tolan Tiga Indonesia was obtained from government which was "Hak Barat (Hak erfpahct)" conversion to SIPEF Group – as documented under	Complied
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.	"Agreement between Government of Indonesia and <i>Societe Internationale de Plantations Et de Finance S.A-SIPEF</i> (Belgium)" dated 29 April 1968.	Complied
4.7.3	Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.	Based on document verification and statement from government officials, audit team gather information PT. Tolan Tiga Indonesia did not conduct any new land clearing since November 2005. However, company established procedure for settling land compensation if new land clearing is necessary for plantation expansion. The procedure established in "Land and Planting Compensation inside Izin Lokasi of The Company No.LCA-01-01/23-09-2020/Rev.2" signed by management on 28 September 2020.	Complied

		<p>As explained under indicator 4.4.1 shows:</p> <ul style="list-style-type: none"> • Company has established procedure to be use as guideline to land compensation and complaint/land claim. • Based on document verification, public consultation and field visit shows within PT. Tolan Tiga Indonesia, there was no new land clearing since November 2005. <p>Based on document evaluation, the procedure explains flow process to land clearing started from planning, inventory land, land measurement involving village government and witnessed by neighbouring entity, prepare the compensation administration (agreement for land compensation, landowner data, legal ownership of the land, statement letter the land free of conflict, etc.), review from Regional Management Office, approval from Head Office Medan, record of implementation land compensation.</p>	
<p>Criteria 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrated that they have legal customary, or user rights.</p>			
4.8.1	<p>Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.</p>	<p>Based on legal document verification, audit team gather information all concession under HGU of PT. Tolan Tiga Indonesia was obtained from government which was "Hak Barat (Hak erfpahct)" conversion to SIPEF Group – as documented under "Agreement between Government of Indonesia and <i>Societe Internationale de Plantations Et de Finance S.A-SIPEF</i> (Belgium)" dated 29 April 1968.</p> <p>Proof of legal acquisition of title reported under indicator 4.4.1.</p>	Complied
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 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>Based on document verification and statement from government officials, audit team gather information PT. Tolan Tiga Indonesia did not conduct any new land clearing since November 2005. However, company established procedure for settling land compensation if new land clearing is necessary for plantation expansion. The procedure established in "Land and Planting Compensation inside Izin Lokasi of The Company No.LCA-01-01/23-09-2020/Rev.2" signed by management on 28 September 2020 and mechanism to convey</p>	Complied

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4.8.3	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).	grievance/complaint under "Grievance Procedure No. IAD-01-08/22-01-2020/Rev.0" signed by President Director 30 January 2020. Audit team noted land claim from Kelompok Tani Bersatu over area inside HGU of PT. Tolan Tiga Indonesia. The company follows the conflict/claim/complaint resolution process with help from third party facilitator and mediation as reported under indicator 4.2.3.	Complied
4.8.4	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).		Complied
<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.	Based on document verification, field visit and interview with weighbridge operator in Perlabian POM, shows in the past 12 months, Perlabian POM only received and processed FFB from company-owned estate. Perlabian POM did not received and process FFB from other party including scheme smallholder or independent smallholders.	Complied
5.1.2	(C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.		Complied
5.1.3	(C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.		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-payments through FFB price reductions for replanting and/or, other support mechanisms where applicable.	Based on document verification and interview with village heads and cooperative chairman, PT. Tolan Tiga Indonesia engaged surrounding community to facilitate partnership oil palm plantation for smallholder. a) Partnership Agreement with Air Merah Village "Perjanjian Kerjasama Kemitraan antara Koperasi Produsen Air Merah Masyarakat Sejahtera (Desa Air Merah) dengan. PT. Tolan Tiga Indonesia" signed on 1 December 2020. The targeted partnership plantation of 370 Ha. The documented agreement acknowledged	Complied

		<p>by Air Merah Village Head and Camat Kampung Rakyat.</p> <p>b) Partnership Agreement with Perlabian Village as in "Perjanjian Kerjasama Kemitraan antara Koperasi Produsen Petani Perlabian Sejahtera (KPPPS), Desa Perlabian dengan PT. Tolan Tiga Indonesia" signed on 1 December 2020. The targeted partnership plantation of 850 Ha.</p> <p>c) Partnership Agreement with Tanjung Selamat Village as in "Perjanjian Kerjasama Kemitraan antara Koperasi Produsen Petani Tanjung Selamat Sejahtera (KPPTS), Desa Tanjung Selamat dengan PT. Tolan Tiga Indonesia" signed on 1 December 2020. Target plantation partner of 530 Ha.</p> <p>Based on interview with Plantation Agency in Labuhanbatu Selatan Regency, audit team gather information PT. Tolan Tiga Indonesia intensively communicating the program to facilitate development of community oil palm plantation as partnership smallholder.</p>	
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe.	<p>PT. Tolan Tiga Indonesia made all contract are legal, transparent and indicated agreed timeframe. In Perlabian POM, contract: "Surat Perjanjian Kerja No.08/PLM-HO/ENG/2022 antara PT. Tolan Tiga Indonesia dengan PT. Triroyall Timurraya untuk pekerjaan One Lot Built Up Solid Box in Perlabian POM" signed on 26 January 2022. Section 2 stipulates agreed timeframe 120 calendar days; Section 10 stated the contract are legally binding.</p> <p>In 2020, Tolan Estate use the service from CV Putra Labuhanbatu Jaya for FFB transport. Contract: "Surat Perjanjian Kerja No.01/RMO-TLE/PLJ/I/2022 antara PT. Tolan Tiga Indonesia dengan CV Putra Labuhanbatu Jaya tentang Angkut FFB" signed on 3 January 2022. Section 4 stipulates agreed timeframe from 3 January 2022 to 31 December 2022. Section 8 stated the contract are legally binding.</p> <p>Based on interview with contractor representative from CV Putra Labuhanbatu Jaya obtained information that there are no issues related to the contract between the company and contractor related to working implementation, transparency, regulation compliance and payment.</p>	Complied

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5.1.6	(C) Agreed payments are made in a timely manner and receipts specifying price, weigh, deductions and amount paid are given.	Unit of certification has had the contract with several contractor that made in a timely manner and receipts specifying price, weigh, deductions and amount paid are given. Sighted the sample of contract for on behalf UD Putra Labuhanbatu Jaya Contract No. 02/RMO-TLE/PLJ/I/2022 dated 03 January 2022 for FFB transporter in Tolan Estate. Sighted invoice for January 2022 that submitted on 24 February 2022 and will be paid not less than 2 weeks after the invoice received by the estate.	Complied
5.1.7	Weighing equipment is verified by an independent third party on a regular basis.	PT. Tolan Tiga Indonesia demonstrates "Surat Keterangan Hasil Pengujian UPTD Metrologi Legal Dinas Perdagangan dan Perindustrian Kabupaten Labuhanbatu No.510.3/189/DagInd-Met/KHP/10/2021" for weighbridge brand: Avery Weigh Tronix Type E1205; Serial Number 143850136; Capacity 40,000 kg / 10 kg; verified on 12 October 2021. This calibration status valid until not less than 12 October 2022.	Complied
5.1.8	The unit of certification supports Independent smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholder on who runs the Internal Controlling System (ICS), who holds the certificate, and who owns and sells certified materials.	<p>PT. Tolan Tiga Indonesia prepared smallholder partnership program, as documented in "Program Kerja Smallholder Perlabian Estate & Tolan Estate 2021".</p> <ul style="list-style-type: none"> • Smallholder partnership preparation: Selection of partner smallholder; collection document showing legal ownership of land; measurement the oil palm block belongs to smallholder – ongoing since January 2020. • Development of cooperative and smallholder member: cooperative committee meeting once per month January – December 2021; training related management and administration February 2021; cooperative member meeting; Training related to harvest March 2021; Training related to fertilizer application June 2021; Training related to pest and disease and use of pesticide June 2021; Training on health and safety September 2021; Training on HCV and RSPO P&C September 2021; Field visit to smallholder plot every two months in 2021. • Preparation for RSPO certification in smallholder cooperative: socialization of certification planning to committee and cooperative member March 2021; ICS structure in cooperative March 2021; document preparation in cooperative April 2021; policy – SOP – smallholder member commitment establishment 	Complied

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		<p>April 2021; preparation smallholder member oil palm block (condition and ID) July 2021; HCV assessment August 2021; Construction of hazardous waste storage October 2021; Construction of tools and material storage November 2021; Pre audit Internal RSPO December 2021.</p> <p>Sighted the "Program Kerja Smallholder Perlabian Estate & Tolan Estate 2022". The program covered the FFB sales to the respective mill, empowering the smallholder partnership through the capacity building, GAP training and smallholder plot visit, and helping the smallholder infrastructure especially road maintenance. Until this audit, the FFB sales and smallholder plot visit has been held on January and February 2022.</p>	
5.1.9	<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>PT. Tolan Tiga Indonesia established SOP Grievance Procedure No.IAD-01-08/22-01-2020/Rev.0 dated 30 January 2020. The grievance mechanism applicable for internal and external parties.</p> <p>Company has "Prosedur Membuat Keluhan" equipped with flowchart: stakeholder made grievance (through email or directly) -> Estate Manager respond to grievance and sign agreement -> GM Human Resource form mediation forum -> GM Human Resource discuss to seek solution (within 30 days) and then sign agreement -> Mediation/tripartite forum giving recommendation to both parties and sign agreement. This procedure has been disseminated to Kampung Sripinang on 2 March 2022, attended by village head and community representatives 21 attendants.</p> <p>Tolan Estate manages "Buku Keluh Kesah Internal Eksternal". In year 2021 consisted of 139 requests from workers. No external complaint recorded yet. Majority related to housing renovation. Sample: On 27 December 2021 on behalf of Field Assistant Division 5, request for field shelter in block F37A Division 5. Responded by Field Head Assistant on same date, ordering upkeep worker to repair.</p> <p>Perlabian Estate manages "Buku Keluh Kesah Internal" and "Buku Keluh Kesah Eksternal". In year 2021 no grievance noted. No internal/external complaint recorded yet.</p>	Complied

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.	Based on interview with Plantation Service in Labuhanbatu Selatan Regency and village community from Air Merah and Sidorejo Village, audit team gather information PT. Tolan Tiga Indonesia intensively communicating the program to facilitate development of community oil palm plantation as partnership smallholder.
5.2.2	The unit of certification develops and implements livelihood improvement programmes, including at least capacity building to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder).	<p>PT. Tolan Tiga Indonesia prepared smallholder partnership program, as documented in "Program Kerja Smallholder Perlabian Estate & Tolan Estate 2020 -2021".</p> <ul style="list-style-type: none"> • Smallholder partnership preparation: Selection of partner smallholder; collection document showing legal ownership of land; measurement the oil palm block belongs to smallholder – ongoing since January 2020. • Establishment of cooperative: meeting for cooperative establishment – documentation/administrative requirement for cooperative establishment – notary deed for cooperative establishment – cooperative permit setting – ongoing since July-August 2020. • Partnership Memorandum of Understanding/MoU signing between cooperative and company: socialization of smallholder partnership MoU; MoU signing between cooperative and company witnessed by village head, regent, and plantation service; handover document to company – done in December 2020. • Preparation of partnership FFB sales to third party POM: Survey FFB price from POM around company; Cost survey for purchase and sales operation to third party company; Estimate crop of partner cooperative; cooperative location survey and FFB quality; Determination and contract to third party POM – ongoing since December 2020; • Preparation for FFB receiving from member of smallholder partnership: cooperative partnership account setting; partner cooperative opens bank account for its smallholder member; socialization FFB receiving and payment

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		<p>for smallholder member; receiving FFB from partner cooperative – planned for January - February 2021.</p> <ul style="list-style-type: none"> • Development of cooperative and smallholder member: cooperative committee meeting once per month January – December 2021; training related management and administration February 2021; cooperative member meeting; Training related to harvest March 2021; Training related to fertilizer application June 2021; Training related to pest and disease and use of pesticide June 2021; Training on health and safety September 2021; Training on HCV and RSPO P&C September 2021; Field visit to smallholder plot every two months in 2021. • Tools provision to smallholder member: PPE provision, spraying tools August 2021; Smallholder plot road maintenance April 2021. • Preparation for RSPO certification in smallholder cooperative: socialization of certification planning to committee and cooperative member March 2021; ICS structure in cooperative March 2021; document preparation in cooperative April 2021; policy – SOP – smallholder member commitment establishment April 2021; preparation smallholder member oil palm block (condition and ID) July 2021; HCV assessment August 2021; Construction of hazardous waste storage October 2021; Construction of tools and material storage November 2021; Pre audit Internal RSPO December 2021. <p>Sighted the “Program Kerja Smallholder Perlabian Estate & Tolan Estate 2022”. The program covered the FFB sales to the respective mill, empowering the smallholder partnership through the capacity building, GAP training and smallholder plot visit, and helping the smallholder infrastructure especially road maintenance. Until this audit, the FFB sales and smallholder plot visit has been held on January and February 2022.</p>	
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	PT. Tolan Tiga Indonesia prepared support program to smallholders to promote legality of FFB production in form “Penjaringan, Pengumpulan Data dan Pengukuran Smallholder PT. Tolan Tiga Indonesia Tahun 2020-2021”, the company assist Koperasi Produsen Petani Perlabian Sejahtera, Perlabian village,	Complied

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		<p>as of December 2020 registered member 236, registered land letter 666, and registered hectarage 863.67 Ha – measure area of 480.81 Ha. Assisted Koperasi Produsen Air Merah Masyarakat Sejahtera, Air Merah village, as of December 2020 registered member 73, registered land letter 189, and registered hectarage 371.04 Ha – measure area of 358.12 Ha. Assisted Koperasi Produsen Petani Tanjung Selamat, Tanjung Selamat Village, as of December 2020 registered member 53, registered land letter 160, and registered hectarage 557.43 Ha – measure area of 550.79 Ha.</p> <p>In year 2021, the verification of land legality against measurement resulted: Koperasi Produsen Petani Perlabian Sejahtera, Perlabian village, as of March 2021 progress registered member 236, registered land letter 641, and registered hectarage 832.98 Ha – measured area of 815.98 Ha. Assisted Koperasi Produsen Air Merah Masyarakat Sejahtera, Air Merah village, as of March 2021 registered member 70, registered land letter 192, and registered hectarage 377.59 Ha – measure area of 412.14 Ha. Assisted Koperasi Produsen Petani Tanjung Selamat, Tanjung Selamat village, as of March 2021 registered member 53, registered land letter 143, and registered hectarage 553.09 Ha – measured area of 553.09 Ha. A number of cooperative member was excluded; reason: legal ownership of land overlapped, incorrect hectarage, single ownership document for multiple lands.</p> <p>Sighted the "Program Kerja Smallholder Perlabian Estate & Tolan Estate 2022". The program covered the FFB sales to the respective mill, empowering the smallholder partnership through the capacity building, GAP training and smallholder plot visit, and helping the smallholder infrastructure especially road maintenance. Until this audit, the FFB sales and smallholder plot visit has been held on January and February 2022.</p>	
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	The supply base for PT. Tolan Tiga Indonesia – Perlabian POM does not include scheme smallholders. However, the company and its supply base prepare program to assist smallholder.	Complied

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		<p>PT. Tolan Tiga Indonesia prepared smallholder partnership program, as documented in "Program Kerja Smallholder Perlabian Estate & Tolan Estate 2020 -2021". The smallholder empowering program has been realized in 2021 such as:</p> <ul style="list-style-type: none"> • Development of cooperative and smallholder member: cooperative committee meeting once per month January – December 2021; • Training related management and administration February 2021; cooperative member meeting; • Training related to harvest March 2021; Training related to fertilizer application June 2021; • Training related to pest and disease and use of pesticide June 2021; Training on health and safety September 2021; • Training on HCV and RSPO P&C September 2021; • Field visit to smallholder plot every two months in 2021. 	
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	<p>Management Review Report (corporate level), dated 4 March 2021.</p> <ul style="list-style-type: none"> • Feedback from Interested parties: The major impact on relationships, communications, and engagement within the business and with all of our external stakeholders for 2020 was the evolving COVID-19 pandemic across the world; Statutory reporting all met in 2020; HGU renewal: impending for North Sumatera Estates; Plasma requirements: new and renewal HGU applications must be supported by a 20% plasma component. • Performance of External Supplier: Smallholder Department, External Suppliers. 	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	(C) A publicity available non-discrimination and equal opportunity policy is implemented in such way to prevent	PT. Tolan Tiga Indonesia established Equal Employment Opportunity Policy No.QMM-40-01-P03/27-03-2019 signed by President Director on 27 March 2019.	Complied

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	<p>discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.</p>	<p>The policy stated PT. Tolan Tiga Indonesia is committed to a non-discriminatory workplace and will abide by the relevant anti-discrimination and equal employment legislation of the Republic of Indonesia. PT. Tolan Tiga Indonesia is not discriminating against anyone in the recruitment process of the company business operations. The company recruitment selection process is based on merit so all applicants with the desired qualifications and experience will be considered for the open position. The successful applicant will be the person who best meets the specific requirements of the job. Promotions within the company are handled on the same basis.</p> <p>In Perlabian POM, the equal employment opportunity policy has been disseminated to 28 workers from Shift B dated 27th January 2022.</p> <p>Perlabian Estate shows list of employees – updated per March 2022 in the organization, whereby shows company total employees is 575 employees: hires people from different religion (Islam 544 employees, Christian 31 employees); origin (local 472 employees, outside area 103 employees); gender (144 female workers, 431 male workers); ages (between 20 years to 50 years).</p> <p>Socialization of this policy for Tolan Estate has conducted. For example, sighted the record of company’s socialization on non-discrimination and equal opportunity policy date 2nd March 2022. The socialization attended by 53 workers from Division I (harvesters, P&D census, waterman, baby sitter, harvesting mandors, loose fruit collectors, gardener); 91 workers from Division II (harvesters, spraying team, harvesting mandors); 82 workers from Division III (harvesters, harvesting mandors, tally clerk, manuring); 42 workers from Division IV (harvesters, harvesting mandors); 63 workers from Division V (harvesters, waterman, baby sitter, harvesting mandors); 90 workers from Division Transport (tractor driver, dump truck driver, quality controller, helper dump truck, carpenter, electrician, school bus driver); 30 workers form contractors (Security)</p> <p>During interview in Division 4 (dated 09/03/2022), block F26A with 2 harvesters they understand the implementation to join non-discrimination and equal opportunity policy.</p>	
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<p>6.1.2</p>	<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. Tolan Tiga Indonesia demonstrated employment procedures related to recruitment, promotion, contract worker recruitment, pension was implemented accordingly.</p> <p>Document recruitment process during ASA 2_2:</p> <ul style="list-style-type: none"> • Request for recruitment coming from Perlabian POM to Engineering Departement, no: 014/PLM/ENG/06-21 dated 21 December 2021. Position request for Processing Station in Perlabian POM. • Interview Evalution Form (No: HRD-01-02-f-02) dated 22 December 2021, namely Mr Josua Manurung. Purpose: This evaluation is to standardize the recording of information collected during an interview and assist in evaluating dan comparing different applications when interview was completed. • Contract Document: Perjanjian Kerja Waktu Tertentu, dated 1st January 2021. Namely Mr Josua Manurung. The contract valid until 1 year. <p>Application and recruitment document sighted: application letter, education certificate, copy of ID card, health certificate, etc. Based on interview with one of new recruited employees, the recruitment process was not involving recruitment fees.</p> <p>Perlabian POM shows list of employees in the organization updated in February 2022, whereby shows company hires people from different religion (Islam 76 employees, Christian 21 employees); origin (local 79 employees, outside area 18 employees); gender (4 female workers, 93 male workers); ages (between 20 years to 50 years).</p>	<p>Complied</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. Tolan Tiga Indonesia demonstrated employment procedures related to recruitment, promotion, contract worker recruitment, pension was implemented accordingly.</p> <p>Document recruitment process during ASA 2_2:</p> <ul style="list-style-type: none"> • Request for recruitment coming from Perlabian POM to Engineering Departement, no: 014/PLM/ENG/06-21 dated 21 December 2021. Position request for Processing Station in Perlabian POM. 	<p>Complied</p>

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		<ul style="list-style-type: none"> • Interview Evaluation Form (No: HRD-01-02-f-02) dated 22 December 2021, namely Mr Josua Manurung. Purpose: This evaluation is to standardize the recording of information collected during an interview and assist in evaluating dan comparing different applications when interview was completed. • Contract Document: Perjanjian Kerja Waktu Tertentu, dated 1st January 2021. Namely Mr Josua Manurung. The contract valid until 1 year. <p>Application and recruitment document sighted: application letter, education certificate, copy of ID card, health certificate, etc. Based on interview with one of new recruited employees, the recruitment process was not involving recruitment fees.</p>	
6.1.4	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.	Based on interview with recruited female worker in Tolan Estate, the selection and recruitment does not involve pregnancy testing.	Complied
6.1.5	(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>PT. Tolan Tiga Indonesia established SOP Gender Committee No.HRD-04-12/24-10-2019, signed on 19 March 2020. The SOP stated Gender Committee task is to give recommendation to BOD on decision making related to gender issue in the company; reviewing and evaluating management of gender issues in company; conduct meeting at least once per year; provides training on understanding of rights of female workers.</p> <p>Tolan Estate has established gender committee Contact Group on 9 March 2022. Chairman Rudy M Malau; Secretary: Wahyu U Putra; Member: Muammar Irwan, D S Siahaan, Heny Rubeka.</p>	Complied
6.1.6	There is evidence of equal pay for the same work scope.	<p>For payment, PT Tolan Tiba Indonesia - Perlabian POM applied an applicable regulation related minimum payment in Regency level</p> <p>Minimum Wage of Labuhanbatu Selatan Regency in 2022 is IDR 2,938,260,- based on Keputusan Gubernur Sumatera Utara Nomor: 188.44/781/KPTS/2021 tentang Penetapan Upah Minimum Kabupaten Labuhan Batu Selatan Tahun 2022.</p>	Complied

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		<p>Minimum Wage of Labuhanbatu Selatan Regency in 2021 is IDR 2,930,970,- based on Keputusan Gubernur Sumatera Utara Nomor: 188.44/578/KPTS/2020 tentang Penetapan Upah Minimum Kabupaten Labuhan Batu Selatan Tahun 2021.</p> <p>Sample of document verified for period December 2021 as follow:</p> <p><u>Spraying workers in Tolan Estate:</u></p> <ul style="list-style-type: none"> - Mrs Ah*** J***, total payment month December 2021 is IDR 3,915,737 <p><u>Harvester in Perlabian Estate:</u></p> <ul style="list-style-type: none"> - Mr W*st****, total payment month December 2021 is IDR 4,944,639 	
<p>Criteria 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).</p>			
<p>6.2.1</p>	<p>(C) Documentation of pay and working conditions in accordance with applicable labour laws are available to the workers in national languages and explained to them in language they understand.</p>	<p>PT. Tolan Tiga Indonesia have documented the pay and working condition in accordance to labour law (Undang-undang No.13 tahun 2003 tentang Ketenagakerjaan), as established under "Perjanjian Kerja Bersama (PKB) PT. Tolan Tiga Indonesia dengan Pengurus Serikat Pekerja Tolan Tiga Mandiri (SPTTM)".</p> <p>The document has been legalized through "Keputusan Kepala Dinas Ketenagakerjaan Kabupaten Labuhanbatu Selatan No.560/329/Naker/XII/2018 tentang Pengesahan Perjanjian Kerja Bersama (PKB) PT. Tolan Tiga Indonesia dengan Pengurus Serikat Pekerja Tolan Tiga Mandiri" dated 3 December 2018.</p> <p>The Collective Labor Agreement (Perjanjian Kerja Bersama) has been registered to Manpower Agency in Labuhanbatu Selatan Regency, as per Degree no: 560/585/NAKER/X/2021 tentang Perpanjangan Masa Berlaku Perjanjian Kerjasama (PKB) PT Tolan Tiga Indonesia Perlabian Estate dengan Serikat Kerja Tolan Tiga Mandiri (SPTTM)", dated 29th October 2021.</p> <p>This document available in Bahasa Indonesia.</p> <ul style="list-style-type: none"> • Regular working hours of 7 hours per day regulated under Chapter IV; • Salary regulated under Chapter V; 	<p>Complied</p>

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		<ul style="list-style-type: none"> • Deductions regulated under Chapter IV; • Overtime regulated under Chapter X, referring to "Keputusan Menteri Tenaga Kerja dan Transmigrasi RI No.102/MEN/VI/2004 tentang Waktu Kerja dan Upah Kerja Lembur"; • Sick leave regulated under Chapter VII; • Annual leave entitlement regulated under Chapter VII; • Maternity leave regulated under Chapter VII; • Reasons for dismissal regulated under Chapter XXI; • Period of notice regulated under Chapter XXI; • Pension regulated under Chapter XVI; • Resolution upon industrial dispute on Chapter XXIII; 	
6.2.2	<p>(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed.</p>	<p>PT. Tolan Tiga Indonesia have documented the pay and working condition in accordance to labour law (Undang-undang No.13 tahun 2003 tentang Ketenagakerjaan), as established under "Perjanjian Kerja Bersama (PKB) PT. Tolan Tiga Indonesia dengan Pengurus Serikat Pekerja Tolan Tiga Mandiri (SPTTM) periode".</p> <ul style="list-style-type: none"> • Regular working hours of 7 hours per day regulated under Chapter IV; • Salary regulated under Chapter V; • Deductions regulated under Chapter IV; • Overtime regulated under Chapter X, referring to "Keputusan Menteri Tenaga Kerja dan Transmigrasi RI No.102/MEN/VI/2004 tentang Waktu Kerja dan Upah Kerja Lembur"; • Sick leave regulated under Chapter VII; • Annual leave entitlement regulated under Chapter VII; • Maternity leave regulated under Chapter VII; • Reasons for dismissal regulated under Chapter XXI; • Period of notice regulated under Chapter XXI; 	Complied

		<ul style="list-style-type: none"> • Pension regulated under Chapter XVI; • Resolution upon industrial dispute on Chapter XXIII; 	
6.2.3	<p>(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, and other legal labour requirements.</p>	<p>PT. Tolan Tiga Indonesia have documented the pay and working condition in accordance to labour law (Undang-undang No.13 tahun 2003 tentang Ketenagakerjaan), as established under "Perjanjian Kerja Bersama (PKB) PT. Tolan Tiga Indonesia dengan Pengurus Serikat Pekerja Tolan Tiga Mandiri (SPTTM)".</p> <ul style="list-style-type: none"> • Regular working hours of 7 hours per day regulated under Chapter IV; • Salary regulated under Chapter V; • Deductions regulated under Chapter IV; • Overtime regulated under Chapter X, referring to "Keputusan Menteri Tenaga Kerja dan Transmigrasi RI No.102/MEN/VI/2004 tentang Waktu Kerja dan Upah Kerja Lembur"; • Sick leave regulated under Chapter VII; • Annual leave entitlement regulated under Chapter VII; • Maternity leave regulated under Chapter VII; • Reasons for dismissal regulated under Chapter XXI; • Period of notice regulated under Chapter XXI; • Pension regulated under Chapter XVI; • Resolution upon industrial dispute on Chapter XXIII; 	Complied

<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. 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>The unit of certification provides adequate housing Perlabian Estate, list of facilities updated in March 2022:</p> <table border="1"> <thead> <tr> <th>Facility</th> <th>Unit</th> <th>Facility</th> <th>Unit</th> </tr> </thead> <tbody> <tr> <td>Masjid</td> <td>4</td> <td>Volley ball court</td> <td>4</td> </tr> <tr> <td>Kindergarten</td> <td>5</td> <td>Football field</td> <td>2</td> </tr> <tr> <td>Day care</td> <td>3</td> <td>Tennis court</td> <td>1</td> </tr> <tr> <td>Employee Hall</td> <td>3</td> <td>School bus</td> <td>1</td> </tr> <tr> <td>Clinic</td> <td>1</td> <td>Fertilizer store</td> <td>1</td> </tr> <tr> <td>Employee house</td> <td>189</td> <td>Chemical store</td> <td>1</td> </tr> <tr> <td>Staff house</td> <td>16</td> <td>Hazardous waste store</td> <td>1</td> </tr> <tr> <td>Fire fighting room</td> <td>1</td> <td>Church</td> <td>1</td> </tr> <tr> <td>Ambulance</td> <td>1</td> <td>Workshop</td> <td>1</td> </tr> </tbody> </table> <p>Tolan Estate, list of facilities updated in March 2022:</p> <table border="1"> <thead> <tr> <th>Facility</th> <th>Unit</th> <th>Facility</th> <th>Unit</th> </tr> </thead> <tbody> <tr> <td>Masjid</td> <td>3</td> <td>Volley-ball court</td> <td>2</td> </tr> <tr> <td>Kindergarten</td> <td>1</td> <td>Football field</td> <td>3</td> </tr> <tr> <td>Day care</td> <td>3</td> <td>Tennis court</td> <td>1</td> </tr> <tr> <td>Employee Hall</td> <td>3</td> <td>School bus</td> <td>1</td> </tr> <tr> <td>Clinic</td> <td>1</td> <td>Fertilizer store</td> <td>1</td> </tr> <tr> <td>Employee house</td> <td>132</td> <td>Chemical store</td> <td>1</td> </tr> <tr> <td>Staff house</td> <td>11</td> <td>Hazardous waste store</td> <td>1</td> </tr> </tbody> </table>	Facility	Unit	Facility	Unit	Masjid	4	Volley ball court	4	Kindergarten	5	Football field	2	Day care	3	Tennis court	1	Employee Hall	3	School bus	1	Clinic	1	Fertilizer store	1	Employee house	189	Chemical store	1	Staff house	16	Hazardous waste store	1	Fire fighting room	1	Church	1	Ambulance	1	Workshop	1	Facility	Unit	Facility	Unit	Masjid	3	Volley-ball court	2	Kindergarten	1	Football field	3	Day care	3	Tennis court	1	Employee Hall	3	School bus	1	Clinic	1	Fertilizer store	1	Employee house	132	Chemical store	1	Staff house	11	Hazardous waste store	1	<p>Complied</p>
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6.2.5	The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.	<p>Field visit to housing area of Perlabian Estate and Tolan Estate and interview with the housewives in the premise. Audit team found</p> <ul style="list-style-type: none"> Company works together with employee cooperative in provision of rice, as part of in-kind benefit for worker. Koperasi Serba Usaha OMI is distributing rice for all workers. Company allows food seller to enter the housing compound. <p>Nearest market selling staple food, vegetables, meat, fish located 1km from Perlabian Estate (Lohsari Village) and 2km from Tolan Estate.</p>	Complied																																										

<p>6.2.6</p>	<p>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>	<p>PT. Tolan Tiga Indonesia has prepared the prevailing wage calculation. The company referred to RSPO Guidance for Implementing Decent Living Wage. Company have taken into calculation the component:</p> <ul style="list-style-type: none"> • Reference Family Size (incl. Total Fertility Rate/TFR and Child Mortality Rate/CMR – Indonesia year 2020). <i>Total Fertility Rate for Indonesia, year 2020 at 2.28 (BPS); Child Mortality Rates for Indonesia, year 2020 at 17.7/1000 births.</i> Reference Family Size at 4.23. • Full time equivalent per Family (incl. Labor Force Participation Rate/LFPR, Unemployment rate, People Working Part Time – Indonesia year 2020). <i>Labour Participation Force Rate for Indonesia, year 2020 at 69.32% (BPS); Unemployment Rate for Indonesia, year 2020 at 4.99% (BPS); People Working Part Time for Indonesia, year 2020 at 23.74% (BPS).</i> Full Time equivalent per family at 1.5802. • Food cost (with 2,100 calories, footnote 19 RSPO Guidance on Implementing DLW) and noted company provided in kind benefit, rice; • Housing cost at 0 (provided by company); • Non Food Non Housing cost (electricity, clean water, medical treatment, education, school children transportation cost – provided by company) based on sampling to 10 workers in Perlabian POM, 10 workers Perlabian Estate, 10 workers in Tolan Estate. • Mandatory deduction (from tax and BPJS levy); <p>Sample of DLW calculation at</p> <ul style="list-style-type: none"> • Minimum Wage of Labuhanbatu Selatan Regency in 2021 is Rp. 2,930,970 (Degree number 188.44/578/KPTS/2020 tentang Penetapan Upmah Minimum Kabupaten Labuhanbatu Selatan 2021). • Gross Living Wage at Rp 3,677,996 • Prevailing wage at Rp. 5,036,202 	<p>Complied</p>
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		<ul style="list-style-type: none"> Living Wage Gap at Rp. 1,358,206 (positive); 	
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>Core work in Perlabian POM such as process operators, boiler operators, tractor driver all permanent fulltime (SKU – Syarat Kecakapan Umum). Perlabian POM recruited 2 contract workers as mill gardener, cleaning gang and mechanic.</p> <p>Core work in Perlabian and Tolan Estate such as harvesters, spraying gang, manuring gang, FFB truck driver, pest & disease census was all permanent fulltime (SKU – Syarat Kerja Umum).</p> <p>In 2021, Tolan Estate recruited 6 PKWT workers as harvester.</p>	Complied
<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>			
6.3.1	<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>PT. Tolan Tiga Indonesia established Freedom of Association Policy No.QMM-40-01-P13/27-03-2019 signed by President Director on 27 March 2019. The policy stated PT. Tolan Tiga Indonesia recognises the role of lawful and independent workers and employees’ representative organizations in creating a constructive working environment. PT. Tolan Tiga Indonesia supports the implementation of the laws and regulations of the Republic of Indonesia relevant to freedom of association for workers and employees. The policy available in Bahasa Indonesia.</p> <p>Implementation: The worker union in PT. Tolan Tiga Indonesia was registered to Manpower Service Labuhanbatu Selatan Regency; through “Surat Dinas Sosial Tenaga Kerja dan Transmigrasi Kabupaten Labuhanbatu Selatan tentang Tanda Bukti Pencatatan Serikat Pekerja Tolan Tiga Mandiri PT. Tolan Tiga Indonesia Nomor Bukti 560/115/DSTKT/2011” dated 14 September 2011.</p> <p>Socialization of this policy for Tolan Estate has conducted. For example, sighted the record of company’s socialization on “Kebijakan Kebebasan Berserikat” socialization on 2nd March 2022. The socialization attended by 53 workers from Division I (harvesters, P&D census, waterman, baby sitter, harvesting mandors, loose fruit collectors, gardener); 91 workers from Division II (harvesters, spraying team, harvesting mandors); 82 workers from Division III (harvesters, harvesting</p>	Complied

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		mandors, tally clerk, manuring); 42 workers from Division IV (harvesters, harvesting mandors); 63 workers from Division V (harvesters, waterman, baby sitter, harvesting mandors); 90 workers from Division Transport (tractor driver, dump truck driver, quality controller, helper dump truck, carpenter, electrician, school bus driver); 30 workers form contractors (Security) During interview in Division 4 (dated 09/03/2022), block F26A with 2 harvesters they understand the implementation to join "Serikat Pekerja" (worker union).	
6.3.2	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.	Meeting between Tolan Estate management and worker union carried out on regular basis. Latest meeting on 13 th January 2022. The meeting was attended by Estate Manager, Field Head Assistant, SPTTM PUK Tolan Estate, Treasury SPTTM, SP TTM members. The meeting agenda related to harvest target in Oil Palm planting year 1994, 1996, 1997, 1998, 1999; request to raise harvesting premium and pruning rate; request to raise recovery price (no change since 2018); The meeting agenda related to formation of LKS Bipartit, sport activity such as volley and badminton after COVID-19 pandemic ends.	Complied
6.3.3	Management does not interfere with the formation or operation of registered labour organizations/unions, or other freely elected representatives for all workers, including migrant and contract workers.	Based on interview with representative of worker union in Tolan Estate the management allows worker union formation to be independent. The worker union member in Tolan Estate participated in free election of worker union chairman in 2021. Based on interview with representative of worker union (dated 09/03/2022) in Tolan Estate the management allows worker union formation to be independent. The worker union member in Perlabian POM participated in free election of worker union chairman.	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.	PT. Tolan Tiga Indonesia established Child Labour Policy No.QMM-40-01-P08/27-03-2019 signed by President Director 27 March 2019. PT. Tolan Tiga Indonesia believes children should have the right to education and a healthy life and is committed to ensuring that children under the age of 18 years are not employed	Complied

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		<p>by the company for any work-related purpose. Company fully supports the relevant Republic of Indonesia laws and other international agreements, such as ILO Child Labour Convention, 1999. PT. Tolan Tiga will not knowingly participate in any activities which could be classed as using child labour. In pursuing the objective, the company will ensure that at time of hiring, the age of all worker (permanent or not) is positively checked (if the person) has an ID card or another official document. When no documents are available to check the age, the company worker/manager in charge will use her/his best judgement and can refuse employment in case of doubt. People refused employment on this basis will be informed that they can file a grievance with the company, for a review of their situation. Contractors and other parties performing work for the company are to be informed of this policy, which will be considered as integral part of their contractual obligations toward the company. In the event of an occurrence of child labour being discovered, the relevant manager must be immediately informed, and immediate action must be taken to correct the situation. It is the obligation of workers and managers to report child labour activities that they witness or that are reported to them. Disciplinary action is taken against company workers who willfully are in breach of this policy.</p> <p>Socialization of this policy for Tolan Estate has conducted. For example, sighted the record of company's socialization on "Kebijakan Pekerja Anak" socialization on 2nd March 2022. The socialization attended by 53 workers from Division I (harvesters, P&D census, waterman, baby sitter, harvesting mandors, loose fruit collectors, gardener); 91 workers from Division II (harvesters, spraying team, harvesting mandors); 82 workers from Division III (harvesters, harvesting mandors, tally clerk, manuring); 42 workers from Division IV (harvesters, harvesting mandors); 63 workers from Division V (harvesters, waterman, baby sitter, harvesting mandors); 90 workers from Division Transport (tractor driver, dump truck driver, quality controller, helper dump truck, carpenter, electrician, school bus driver); 30 workers form contractors (Security)</p>	
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		<p>During interview in Division 4 (dated 09/03/2022), block F26A with 2 harvesters they understand the implementation as prohibit accepting worker under 18 years old or still in school.</p> <p>Contract: "Surat Perjanjian Kerja No.01/RMO/DLE/PLJ/I/2022 antara PT. Tolan Tiga Indonesia dengan UD Labuhanbatu Jaya, signed on 3rd January 2022. The contract, section 5 stipulates contractor not employ worker under 18 years old.</p>	
6.4.2	<p>(C) Documented evidence on the fulfilment of worker's minimum age requirements in accordance with applicable regulation and verification procedures for age requirements, are available.</p>	<p>PT. Tolan Tiga Indonesia demonstrated document Manpower establishment.</p> <ul style="list-style-type: none"> Tolan Estate, as of March 2022; total manpower 407 personnel. Youngest worker Rahmat Setiadi, birth date 25 February 2001, first date of work 1 June 2021 – at 20 years and 4 months. KTP/ID card checked and verified. Perlabian Estate, as of February 2022; total manpower 557 personnel. Youngest worker Yopi Syahputra, birth date 16 October 2001, first date of work 1 February 2021 – at 19 years and 4 months. KTP/ID card checked and verified. 	Complied
6.4.3	<p>(C) Young person maybe employed only for non-hazardous work with protective restrictions in place for that work.</p>	<p>No worker under 18 years old employed by PT. Tolan Tiga Indonesia. PT. Tolan Tiga Indonesia demonstrated document Manpower establishment.</p> <ul style="list-style-type: none"> Tolan Estate, as of March 2022; total manpower 407 personnel. Youngest worker Rahmat Setiadi, birth date 25 February 2001, first date of work 1 June 2021 – at 20 years and 4 months. KTP/ID card checked and verified. Perlabian Estate, as of February 2022; total manpower 557 personnel. Youngest worker Yopi Syahputra, birth date 16 October 2001, first date of work 1 February 2021 – at 19 years and 4 months. KTP/ID card checked and verified. 	Complied
6.4.4	<p>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.</p>	<p>Socialization of this policy for Tolan Estate has conducted. For example, sighted the record of company's socialization on "Kebijakan Pekerja Anak" socialization on 2nd March 2022. The socialization attended by 53 workers from Division I (harvesters, P&D census, waterman, baby sitter, harvesting mandors, loose fruit collectors, gardener); 91 workers from Division II (harvesters, spraying team, harvesting mandors); 82 workers from Division III (harvesters, harvesting mandors, tally clerk, manuring); 42 workers from Division IV (harvesters, harvesting mandors); 63 workers from Division V (harvesters, waterman, baby</p>	Complied

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		<p>sitter, harvesting mandors); 90 workers from Division Transport (tractor driver, dump truck driver, quality controller, helper dump truck, carpenter, electrician, school bus driver); 30 workers form contractors (Security)</p> <p>During interview in Division 4 (dated 09/03/2022), block F26A with 2 harvesters they understand the implementation as prohibit accepting worker under 18 years old or still in school.</p>	
<p>Criteria 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.</p>			
<p>6.5.1</p>	<p>(C) A policy to prevent sexual and all other form of harassment and violence is documented, implemented and communicated to all levels of the workforce.</p>	<p>PT. Tolan Tiga Indonesia established Sexual Harassment Policy No.QMM-40-01-P10/27-03-2019 signed by President Director on 27 March 2019. The policy stated PT. Tolan Tiga Indonesia is committed to ensuring harmonious and productive work environment for its workers. This commitment recognises that the workplace should be free of sexual harassment. Sexual harassment is unwanted, unwelcome and offensive behaviour and will not be tolerated under any circumstances. PT. Tolan Tiga Indonesia supports a strict implementation of the laws and regulations of Republic of Indonesia punishing sexual harassment. All report of sexual harassment will be dealt with a sympathetic and confidential manner to help achieve fair hearings of the reports. No person/whistleblower is to be victimised for reporting sexual harassment.</p> <p>Socialization of this policy for Tolan Estate has conducted. For example, sighted the record of company's socialization on "Kebijakan Pelecahan Seksual" socialization on 2nd March 2022. The socialization attended by 53 workers from Division I (harvesters, P&D census, waterman, baby sitter, harvesting mandors, loose fruit collectors, gardener); 91 workers from Division II (harvesters, spraying team, harvesting mandors); 82 workers from Division III (harvesters, harvesting mandors, tally clerk, manuring); 42 workers from Division IV (harvesters, harvesting mandors); 63 workers from Division V (harvesters, waterman, baby sitter, harvesting mandors); 90 workers from Division Transport (tractor driver, dump truck driver, quality controller, helper dump truck, carpenter, electrician, school bus driver); 30 workers form contractors (Security)</p>	<p>Complied</p>

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		During interview in Division 4 (dated 09/03/2022), block F26A with 2 harvesters they understand the implementation as prohibit accepting worker under 18 years old or still in school.	
6.5.2	(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>Socialization of this policy for Tolan Estate has conducted. For example, sighted the record of company's socialization on "Kebijakan Pelecahan Seksual" socialization on 2nd March 2022. The socialization attended by 53 workers from Division I (harvesters, P&D census, waterman, baby sitter, harvesting mandors, loose fruit collectors, gardener); 91 workers from Division II (harvesters, spraying team, harvesting mandors); 82 workers from Division III (harvesters, harvesting mandors, tally clerk, manuring); 42 workers from Division IV (harvesters, harvesting mandors); 63 workers from Division V (harvesters, waterman, baby sitter, harvesting mandors); 90 workers from Division Transport (tractor driver, dump truck driver, quality controller, helper dump truck, carpenter, electrician, school bus driver); 30 workers form contractors (Security)</p> <p>During interview in Division 4 (dated 09/03/2022), block F26A with 2 harvesters they understand the implementation</p>	Complied
6.5.3	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>PT. Tolan Tiga Indonesia and worker union has agreed on breastfeeding time, as stipulated in "Perjanjian Kerja Bersama (PKB) PT. Tolan Tiga Indonesia dengan Pengurus Serikat Pekerja Tolan Tiga Mandiri (SPTTM)", Chapter XIV – Section 5.b. "Pengusaha memberikan kesempatan yang cukup kepada pekerja wanita untuk menyusukan anaknya" – company provides sufficient opportunity for female worker to breastfeed their children.</p> <p>Consultation conducted via questionnaire "Formulir Interview dengan Ibu Baru Bersalin/Menyusui", filled in by respondent field assistant on 30 March 2020. The questionnaire: status of work? presence of children needing breastfeeding? exclusive breastfeeding? breastfeeding frequency? breastfeeding timeframe? permission from company for breastfeeding time? breastfeeding frequency during working hour? breastfeeding time adequate? provision of specific place for breastfeeding? pay deduction for time used during breastfeeding time? Provision</p>	Complied

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		<p>of access to information related to breastfeeding consultation, baby health and vaccination?</p> <p>Based on interview with Gender Committee (dated 08/03/2022) member in Perlabian POM, nursing mother given opportunity to breastfeed their baby every day, half to one hour outside lunch break. The nursing mother can do this for six months.</p> <p>Based on interview with female worker in Tolan Estate (dated 09/03/2022), working as fertilizer applicators, nursing mother given opportunity to return home or to day care to breastfeed their baby every day, half to one hour outside lunch break. The nursing mother can do this for six months.</p>	
6.5.4	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, as long as the complaint is supported with adequate information, is documented, implemented and communicated to all levels of the workforce.</p>	<p>PT Tolan Tiga Indonesia has defined the procedure of "Prosedur Membuat Keluhan" equipped with flowchart: stakeholder made grievance (through email or directly) -> Estate Manager respond to grievance and sign agreement -> GM Human Resource form mediation forum -> GM Human Resource discuss to seek solution (within 30 days) and then sign agreement -> Mediation/tripartite forum giving recommendation to both parties and sign agreement. This procedure has been disseminated to Desa Perkebunan Perlabian on 1st March 2022, attended by village head and community representatives 51 attendants.</p> <p>In Tolan Estate, based on review of "Buku Keluh Kesah Internal Eksternal". In year 2021, there was 51 requests from workers. No external complaint recorded yet. Majority related to housing renovation. Sample: On 20 December 2021, Bapak Rahmadianto – harversting supervisor, request for housing No.0465 repair, septic tank full/clogged. Responded by Field Head Assistant on same date (on 20 December 2021), ordering carpenter/civil engineering to repair". Septic tank repair completed.</p>	Complied
<p>Criteria 6.6: No forms of forced or trafficked labour are used.</p>			
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; 	<p>Based on interview with workers, worker union representative, and manpower service Labuhanbatu Selatan Regency (on 08-09/03/2022), stated that the unit of certification does not practiced forced labour:</p>	Complied

	<ul style="list-style-type: none"> • 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 	<ul style="list-style-type: none"> • Retention of identity documents or passports: Interview with PKWT worker in Perlavian POM, his ID card was not hold by company. • Payment of recruitment fees: Interview with PKWT worker in Perlavian POM, during his application and recruitment in December 2021, not paying any recruitment fees. • Contract substitution: Interview with PKWT worker in Perlavian POM, his contract with company under PKWT, signed 1st January 2022 was consistently implemented. • Involuntary overtime: Interview with harvesters in Tolan Estate, company offers overtime/additional harvesting work during peak crop (usually on Sunday), but it was up to individual worker to decide whether they joined overtime. • Lack of freedom of workers to resign: Based on interview with herbicide sprayers in Tolan Estate, they can resign anytime – following regulation in PKB (one-month notice). • Penalty for termination of employment: Based on interview with herbicide sprayers in Tolan Estate, they can resign anytime, and no penalty imposed – following regulation in PKB (one month notice). • Debt bondage: Interview with harvesters in Tolan Estate, they understand forced labor. There is no debt bondage. • Withholding of wages: Interview with fertilizer applicators in Tolan Estate, wage paid every month. There is no salary withholding. 	
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>PT. Tolan Tiga Indonesia established a set of procedure for recruitment of temporary worker (Specified Time Work Agreement/PKWT). There is no migrant worker in PT. Tolan Tiga Indonesia – confirmed with Manpower Service of Labuhanbatu Selatan Regency and Worker Union. SOP Recruitment for PKWT No.HRD-01-03/09-03/2020/Rev.2 dated 17 March 2020. This SOP regulates the recruitment process for temporary worker are done according to valid procedures and approved manpower plan. The SOP stated:</p>	Complied

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		<ul style="list-style-type: none"> • Office Assistant/ Field Assistant/ Mill Assistant prepare a proposal for PKWT based on budget available, work experience, achievements. • Proposal verified by Field Head Assistant/ Mill Head Assistant/ Technical Head Assistant and sent to Regional Manager Office. • General Manager/ Regional Director verified and approved the employee request. • Office Assistant create work agreement which is signed by Estate Manager/ Mill Manager and PKWT. • Section 10 of the SOP stipulates that Free Labour and PKWT are not allowed to do the main work such as harvesting and processing. • PKWT can only be implemented for a maximum 2 (two) years with following conditions: first PKWT no longer than 1 year. • The second PKWT no longer than 1 year. Furthermore, if approved by BOD, renewal of extension of PKWT can only held after exceeding 30 (thirty) days grace period since the end of second PKWT and may only be done 1 (one) time and a maximum of 2 (two). • PKWT shall be registered with BPJS Ketenagakerjaan and BPJS Kesehatan program. • The basis of payment for PKWT wages per day is UMP/UMSP/UMK/UMSK divided by 25 if working time is 6 days a week or divided by 21 if working time is 5 days a week. <p>Evidence verification during 2_2 (March 2022): “Perjanjian Kerja Waktu Tertentu Suherman (Smallholders Support) dan PT. Tolan Tiga Indonesia”, signed on 1 September 2021. The PWKT stipulates:</p> <ul style="list-style-type: none"> • Clause 1: PKWT for Ebert as upkeep mill; PKWT period 1 September 2021 – 31 August 2022 (1 year); 	
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		<ul style="list-style-type: none"> • Clause 4: Salary paid per month, equal to UMP/UMSP/UMK/UMSK applicable to the company. Employee entitled for the salary including rice 15kg/month. • Clause 5: Company provides medical treatment for employee as per regulation. • Clause 7: Company will register employee to BPJS Ketenagakerjaan. 	
Criteria 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.			
6.7.1	<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. Tolan Tiga Indonesia has established Occupational Health and Safety Policy No.QMM-40-01-P04/27-03-2019 dated 27 March 2019.</p> <p>PT. Tolan Tiga Indoensia recognizes that a safe and healthy workplace is of the utmost importance. We therefore committed to provide a safe working environment for our workers and all other stakeholders. Company believed in continually improving our health and safety and this will be achieved through; hazards and risks identification and reduction, provision of adequate resources for effective implementation of the OHS programmes and procedures, including strict compliance reviews; Ensuring the OHS policy and procedures integrate with all other company policies.</p> <p>Safety Committee has registered to Manpower Agency as per "Surat Keputusan Kepala Dinas Ketenagakerjaan Kabupaten Labuhanbatu Selatan Nomor: KEP.02/P2K3/Naker/I/2021 tentang Pengesahan Panitia Pembina Keselamatan dan Kesehatan Kerja (P2K3) di Perusahaan, dated 25th January 2021.</p> <p>Safety Officer attended OHS training on 24 February – 7 March 2014. Appointment as Safety Officer as per document of: "Keputusan Menteri Ketenagakerjaan Republik Indonesia No.5/9317/AS.02.04/X/2020 tentang Penunjukan Ahli Keselamatan dan Kesehatan Kerja Umum atas nama Marwin", dated 19 October 2020 and valid for 3 years.</p> <p>OHS Committee Meeting:</p> <ul style="list-style-type: none"> • Sample record of OHS meeting dated 24th January 2022, agenda: discussion of sick pay day, report of OHS inspection and accident report. The meeting was attended by Mill manager, head assisten, workshop assisten, OHS expert. 	Complied

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		<ul style="list-style-type: none"> Report of OHS performance period October – December 2021. Has submitted to Dinas Tenaga Kerja dan Transmigrasi Labuhanbartu Selatan Regency. Report number: 05/PLM-02/2022 dated 9th February 2022. 	
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>In Perlabian POM, “Kebijakan Kesehatan dan Keselamatan Kerja” policy has been disseminated to 28 workers from Shift B dated 27th January 2022.</p> <p>Socialization of this policy for Tolan Estate has conducted. For example, sighted the record of company’s socialization on non-discrimination and equal opportunity policy date 2nd March 2022. The socialization attended by 53 workers from Division I (harvesters, P&D census, waterman, baby sitter, harvesting mandors, loose fruit collectors, gardener); 91 workers from Division II (harvesters, spraying team, harvesting mandors); 82 workers from Division III (harvesters, harvesting mandors, tally clerk, manuring); 42 workers from Division IV (harvesters, harvesting mandors); 63 workers from Division V (harvesters, waterman, baby sitter, harvesting mandors); 90 workers from Division Transport (tractor driver, dump truck driver, quality controller, helper dump truck, carpenter, electrician, school bus driver); 30 workers form contractors (Security)</p> <p>During interview in Division 4 (dated 09/03/2022), block F26A with 2 harvesters, they understand the implementation as identification of hazard and risk, provision of PPE, standing by first aider (mandors); BPJS Ketenagakerjaan and BPJS Kesehatan; referral to hospital when accident occurs.</p>	Complied
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 Tolan Tiga Indonesia - Perlabian POM have provided training related to OHS and PPE in accordance with the result of risk assessment year 2022.</p> <p>The 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>Tolan Estate:</p>	Complied

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		<ul style="list-style-type: none"> Record of handover of PPE (AP boot, mask, apron, gloves) for spraying team dated 3rd August 2021 for 10 workers/pesticides applicators. Record of handover of PPE (AP boot), e.g: dated February 2021 for 64 harvesters, 28 fertilizer applicators. Record of handover of PPE (AP boot), e.g: dated February 2021 for 64 harvesters, 28 fertilizer applicators Record of handover of PPE for harvester (AP boot, gloves) dated 21 July 2021 for 35 workers/harvester. Record of handover of PPE for fertilizer applicator (AP boot,) for spraying team dated 3rd August 2021 for 29 workers/ Report of inspection of using of PPE (monthly bases), e.g: dated 6th December 2021 division I reported OK. <p>Pelabian POM:</p> <ul style="list-style-type: none"> Record of handover of PPE (safety shoes) for mill workers (foremane in processing – dated 26th September 2021), (engine room OP – dated 26th September 2021) Checklist on monitoring of PPE use for workers in UMW POM - monthly, e.g: October to December 2021, the result reported OK <p>Implementation in Tolan Estate, PPE provided by company to workers for free.</p>	
6.7.4	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>PT Tolan Tiga Indonesia – Perlabian POM provide all workers will medicalcare, and covered by accidents insurance, the statement as mentioned in Memorandum No: 436/MED-CIR/XII/2015, dated 2nd December 2015 was signed by Company Doctor.</p> <p>Based on interview with sample workers during field visit and consultation with labor union, they were stated all workers are provided with medical care and accident under BPJS Kesehatan and PBJK Ketenagakerjaan. An accident insurance is covered under "BPJS Ketenagakerjaan" with Accident and Life Program (JKK and JK).</p>	Complied

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		<p>According to Employee Database February 2022:</p> <ul style="list-style-type: none"> • Perlabian POM: total employees covered by accident insurance (BPJS Ketenagakerjaan) is 93 employees. • Perlabian Estate: total employees covered by accident insurance (BPJS Ketenagakerjaan) is 587 employees. • Tolan Estate: total employees covered by accident insurance (BPJS Ketenagakerjaan) is 401 employees. 											
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	<p>PT Tolan Tiga Indoensia has shown the record of injuries using lost time accident (LTA) metrics as in "Rekapitulasi Kejadian Kecelakaan Kerja- LTA" year 2021</p> <ul style="list-style-type: none"> • Perlabian POM, there was 2 accidents reported year 2021, lost time accidents were 24 mandays • Tolan Estate, year 2021 there was an accident reported, lost time is 12 mandays. <p>All the accidents have followed up with investigation record and recommendation. The investigation has completed with accident insurance claims records. Those cases already reported and claim to accident insurance services (BPJS Ketenagakerjaan).</p>	Complied										
<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>													
7.1.1	(C) IPM plans are implemented and monitored to ensure effective pest control.	<p>Integrated Pest Management plan in Perlabian Estate is evident, as titled "Program Pengendalian Hama Terpadu 2022", established 5 January 2022. According to Procedure Integrated Pest Management OPM-07-04/17-07-2019/Rev.3.</p> <p>Realisation of IPM Program 2021 in Perlabian Estate:</p> <table border="1"> <thead> <tr> <th>No</th> <th>Program</th> <th>Plan</th> <th>Actual</th> <th>Remaks</th> </tr> </thead> <tbody> <tr> <td>1.</td> <td>Nursery of Benefetial Plant</td> <td>March – July</td> <td>June & August 2021</td> <td>June: 1,252 PolyBag August: 3,050 Polybag</td> </tr> </tbody> </table>	No	Program	Plan	Actual	Remaks	1.	Nursery of Benefetial Plant	March – July	June & August 2021	June: 1,252 PolyBag August: 3,050 Polybag	Complied
No	Program	Plan	Actual	Remaks									
1.	Nursery of Benefetial Plant	March – July	June & August 2021	June: 1,252 PolyBag August: 3,050 Polybag									

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		2.	Planting of Beneficial Plant	Aug – Dec	Aug – Dec	I: 50 Plot IV: D17 & D18 = 512 Plot		
		3.	Monitoring of Beneficial Plant	Monthly	Monthly	I: 50 Plot IV: D17 & D18		
		4.	Upkeep of barn-owl box	Monthly	Monthly	III: 9 Unit		
		5.	Cencus P & D / Ganoderma	May & Oct	May & Oct	Report of Ganoderma census 2 nd Semester 2021		
		6.	Monitoring of barn-owl box	Monthly	Monthly	III: 9 Unit		
		Program IPM Perlabian Estate for 2022						
		No	Program	Plan	Actual	Remaks		
		1.	Nursery of Benefetial Plant	May				
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		4.	Upkeep of barn-owl box	Monthly	Jan 2022	III: 9 Unit		
		5.	Cencus P & D / Ganoderma	May & Oct				
6.	Monitoring of barn-owl box	Monthly	Jan 2022	III: 9 Unit IV: Tidak ada Gupon				
Rat are naturally control by barn owl. Beneficial plant identification described census result of Nettle Caterpillar natural enemy: <i>Euchanticona</i> , <i>Sycanus</i> , <i>Dolichogenidae</i> , <i>Systropus</i> , <i>Cordyceps</i> ; Benficial Plants: <i>Turnera subulatta</i> , <i>Casia</i>								

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		<p><i>coabnensis, Casia tora, Antigonon leptopus</i>; Beneficial weeds: <i>Nephrolepis, Axonopus, Kretekan, Pakis Sayur</i>.</p> <p>Training of pest and disease conducted annually, the latest training conducted in 30 April 2021 attended by 11 participants. Training of spraying and spraying tools calibration on 5 July 2022, attended by 21 participants.</p> <p>Realisation of IPM Program 2021 in Tolan Estate:</p> <table border="1"> <thead> <tr> <th>No</th> <th>Program</th> <th>Plan</th> <th>Actual</th> <th>Remaks</th> </tr> </thead> <tbody> <tr> <td>1.</td> <td>Repair of barn-owl box</td> <td>Jul</td> <td>Feb</td> <td>Available picture of barn-owl box repair in Feb 2021</td> </tr> <tr> <td>2.</td> <td>Census of Ganoderma</td> <td>May & Dec</td> <td>May</td> <td>Available record foe 1st & 2nd semester</td> </tr> <tr> <td>3.</td> <td>Monitoring of barn-owl box</td> <td>Monthly</td> <td>Jan - Jun</td> <td>Div I: 6 Div II: 5 Div III: 7 Div IV: 6 Div V: 5</td> </tr> </tbody> </table> <p>Biological control performed by planting and upkeep beneficial plant. During field visit, it was observed <i>Turnera subulatta</i> planted in most of the collection road or transport road, as well as <i>Antigonon leptopus</i> and <i>Casia tora</i>.</p> <p>Program IPM Tolan Estate for 2022</p> <table border="1"> <thead> <tr> <th>No</th> <th>Program</th> <th>Plan</th> <th>Actual</th> <th>Remaks</th> </tr> </thead> <tbody> <tr> <td>1.</td> <td>Repair of barn-owl box</td> <td>Jul</td> <td></td> <td></td> </tr> <tr> <td>2.</td> <td>Census of Ganoderma</td> <td>Mei & Des</td> <td></td> <td></td> </tr> <tr> <td>3.</td> <td>Monitoring of barn-owl box</td> <td>Monthly</td> <td>Jan - Jun</td> <td>Div I: 6 Div II: 5 Div III: 7</td> </tr> </tbody> </table>	No	Program	Plan	Actual	Remaks	1.	Repair of barn-owl box	Jul	Feb	Available picture of barn-owl box repair in Feb 2021	2.	Census of Ganoderma	May & Dec	May	Available record foe 1 st & 2 nd semester	3.	Monitoring of barn-owl box	Monthly	Jan - Jun	Div I: 6 Div II: 5 Div III: 7 Div IV: 6 Div V: 5	No	Program	Plan	Actual	Remaks	1.	Repair of barn-owl box	Jul			2.	Census of Ganoderma	Mei & Des			3.	Monitoring of barn-owl box	Monthly	Jan - Jun	Div I: 6 Div II: 5 Div III: 7	
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					Div IV: 6 Div V: 5		
		The latest training of pest & disease conducted in 8 October 2021 attended by 13 participants.					
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 unit of certification has a list of Global Invasive Species and evaluate the status of existence in certified area on 2 January 2022 in Perlabian Estate and on 17 February 2022 in Tolan Estate. Some species are naturally existing in the area and the spreading are controlled manually, e.g. <i>Achatina fulica</i> , <i>Ageratum conizoides</i> , <i>Clidemia hirta</i> , <i>Imperata cylindrica</i> , <i>Lantana camara</i> , <i>Mikania micranta</i> and <i>Mimosa pudica</i> . There are no species in the list that used to manage areas in unit of certification.				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 field visit and document review, there is no use of fire for pest control in whole area of Perlabian Estate and Tolan Estate.				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.	The unit of certification has recorded list of herbicides used, completed with active ingredient, WHO class, trademark, target, registration number and expiry date.				Complied	
		Trademark	Active Ingredient	WHO Class	Target	Registration Number	Expiry date
		Smart 486 AS	Isopropil amina glifosat 486 g/l	U	Grasses weed	RI.01030119971 313	12/11/2023
		Supremo 486 AS	Isopropil amina glifosat 486 g/l	U	Grasses weed	RI.01030120021 712	02/05/2022
		Becano 500 SC	Indaziflam 500 gr/L	III	Broad leaf	RI.01030120124 279	05/05/2022
		Metsulindo 20 WP	Metil metsulfuron 20%	U	Ferns, Broad Leaf, Sedges	RI.01030119991 484	22/02/2025

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7.2.2	<p>(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per Ha and number of applications) are provided.</p>	<p>Document "Rekapitulasi Penggunaan Pestisida Tahun 2021" recorded pesticides use including active ingredients, LD50, area treated, amount of active ingredients applied per Ha and per ton FFB.</p> <p>Pesticide use in Perlabian Estate and Tolan Estate in 2021:</p> <table border="1"> <thead> <tr> <th rowspan="2">Trademark</th> <th colspan="2">Volume</th> <th rowspan="2">UoM</th> </tr> <tr> <th>Perlabian</th> <th>Tolan</th> </tr> </thead> <tbody> <tr> <td>Basta 150 SL</td> <td>33.60</td> <td>26.22</td> <td>Ltr</td> </tr> </tbody> </table>	Trademark	Volume		UoM	Perlabian	Tolan	Basta 150 SL	33.60	26.22	Ltr	Complied																																						
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7.2.3	(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.	Use of pesticide are minimized as part of the plan, and in accordance with IPM Plans, there are no pesticide application outside of the targeted species and planned intervals. Pesticide are only used to reduce/eliminate existing pest, which has exceeded the economic threshold.	Complied																																																												
7.2.4	There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in Indonesia best practice guidelines.	There is no use of prophylactic use of pesticides throughout PT Tolan Tiga Indonesia. Pesticide/Herbicides are only used to reduce/eliminate existing pest, which has exceeded the economic threshold.	Complied																																																												

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<p>7.2.5</p>	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat, are not to be used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to:</p> <p>7.2.5a Judgment of the threat and verify why this is a major threat.</p> <p>7.2.5b Why there is no other alternative which can be used.</p> <p>7.2.5c Which process was applied to verify why there is no other less hazardous alternative.</p> <p>7.2.5d Process to limit the negative impacts of the application.</p> <p>7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</p>	<p>There is no use of WHO Class 1A or 1B pesticide in whole plantation operation. The use of paraquat has been stopped since 2017. The company's General Manager of North Sumatera has issued Memorandum No.117/GMO-All Estate/XI/2016, dated 1 December 2015. The memorandum stated that the use of paraquat as contact pesticide is not allowed as of 1 January 2017. Target: Zero use of paraquat effective since 1 January 2017.</p> <p>Based on visit in field operation and agrochemical storage in Perlabian Estate and Tolan Estate, there was no paraquat found. Based on report of pesticides uses in 2021 and 2022 – there were no paraquat noted in the report.</p> <p>There is no use of pesticide that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, or paraquat in whole operation of unit of certification.</p> <p>There is no use of pesticide that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, or paraquat in whole operation of unit of certification.</p> <p>There is no use of pesticide that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, or paraquat in whole operation of unit of certification.</p> <p>There is no use of pesticide that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, or paraquat in whole operation of unit of certification.</p>	<p>Complied</p>
<p>7.2.6</p>	<p>(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they conduct.</p>	<p>All Estate (Perlabian and Tolan Estate) have provided basic training related to pesticide, understanding material safety data sheet/MSDS, limited pesticide training, emergency condition training and first aid training.</p> <p>Chemical warehouse and its infrastructure is ready (see criterion 4.6.6).</p> <p>Standard PPE for sprayer: masker, apron, rubber glove, rubber boot. Standard PPE for chemical mixer/chemical storekeeper: faceshield, masker, apron, rubber glove, safety boot.</p>	<p>Complied</p>

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		<p>Record of training for person who handling pesticides, such as:</p> <ul style="list-style-type: none"> • Attendance list of "Training Kaliberasi Alat Spraying & dan Penyemprotan Pestisida" dated 21 September 2021, located at Division V Tolan Estate, attended by 11 workers, includeing workers interviewed during field visit. • Attendance list of Training of Spraying and Spraying tools calibration dated 5 July 2022, location in mixing area Perlabian Estate, was attended by 21 participants. 	
7.2.7	<p>(C) Storage of all pesticides in accordance with recognized best practices.</p>	<p>The storage for all pesticide is in good condition.</p> <p>Based on filed visit (dated 9th March 2022) in storage of pesticides and interview with storage keepers both in Perlabian POM and Tolan Estate; there was found the storage for all pesticide is in good condition.</p> <p>A standard storage system appears to be implemented across by the organization. The storage is equipped with sufficient air ventilation to provide air circulation.</p> <p>Hazard signs, emergency shower, secondary containment, spill kit, appropriate PPE (overall, face shield, impermeable rubber gloves, apron, and mask) is available and ready for use.</p> <p>Working instruction for pre-mixing, stacking, and storing pesticide is current, MSDS is also readily available. Material Data Safety Sheets (MSDS) are obtained for all chemicals used and are available at the areas of mixing. These were all seen be controlled by date and were readily available. No concentrates are taken into the field are pre-mixed in designated mixing area.</p> <p>Awareness training for MSDS dated 20 November 2021 was attended by 11 workers in chemical storage.</p>	Complied

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7.2.8	All pesticide containers that are disposed of and/or used for other purposes are managed according to applicable regulations and/or instructions on the packaging.	<p>All chemical and their containers from Mill and Estates were collected and kept in temporary waste storage for 180 up to 365 days prior disposal.</p> <p>Review of records showed all hazardous waste has been identified and properly monitored, such as used oil, used oil filter, used batteries, empty chemical container from Estate and Mill activities, contaminated materials, etc. Monitoring was recorded in document "Neraca Waste B3".</p> <p>Record of disposal all of pesticides container as per "Berita Acara Serah Terima Barang Waste Bahahn Berbahaya dan Beraacun (B3) – No: 001/I/TTI/2022" dated 6th January 2022, delivered to PT Amindy Barakah Sumut, consisted of:</p> <table border="1" data-bbox="965 683 1796 868"> <thead> <tr> <th>Type of B3</th> <th>Volume (Ton)</th> <th>Manifest Elektronik</th> </tr> </thead> <tbody> <tr> <td>Kemasan Bekas B3 (B104d)</td> <td>0.0818</td> <td>KLHK-1644137222</td> </tr> <tr> <td>Waste Klinis (A337-1)</td> <td>0.0032</td> <td>KLHK-1644275162</td> </tr> </tbody> </table>	Type of B3	Volume (Ton)	Manifest Elektronik	Kemasan Bekas B3 (B104d)	0.0818	KLHK-1644137222	Waste Klinis (A337-1)	0.0032	KLHK-1644275162	Complied
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7.2.9	(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.	Unit of Certification applying pesticides through manual by persons/sprayer. Therefore, no aerial spraying is available. Not applicable	Complied									
7.2.10	(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.	<p>The special annual medical surveillance for pesticides operators and workers consisted of pesticides applicators, chemical storage keeping, generator (electrical) operator. Last medical check up conducted on 29th September 2021.</p> <p>Data verified: "Laporan Hasil Pemeriksaan Kesehatan – Pekerja dengan Resiko Tinggi" (result of medical test has communicated to related workers</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.	Tolan Estate implement monitoring on pregnant mother and breastfeeding mother, working as fertilizer applicators – recorded under “Daftar Absensi Tenaga Kerja Tidak Hamil dan Menyusui – periode January – December 2021”. The record shows 17 female workers, but no pregnant or breastfeeding female workers. Perlabian Estate implement monitoring on pregnant mother and breastfeeding mother, working as fertilizer applicators – recorded under “Data Karyawan Tidak Hamil dan Menyusui – periode Februari 2022”. The record shows 22 female workers (sprayers and fertilizer applicators), but no pregnant or breastfeeding female workers.	Complied
Criteria 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.			
7.3.1	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented in accordance with applicable laws and regulations.	All pesticide and agrochemical containers that produced from Estate and Mill are disposed and store at registered hazardous and toxic substances waste temporary storage (TPS LB3) which located at Perlabian POM and Tolan Estate. <ul style="list-style-type: none"> Permit of hazardous and toxic substances waste temporary storage (TPS LB3) Perlabian POM as referred No.503/0003/DPMPPTSP-LS/V/2020, dated 8 May 2020. Validity for 5 years. Source of waste covering Perlabian POM and Perlabian Estate. Permit of hazardous and toxic substances waste temporary storage (TPS LB3) Tolan Estate as referred No.503/0004/DPMPPTSP-LS/V/2020, dated 8 May 2020. Validity for 5 years. Source of waste covering Tolan Estate. <p>The Auditor Team has conducted a visit to the location of the temporary storage of hazardous and toxic waste. The conditions for the hazardous waste warehouse are in accordance with the permits they have, and the requirements stated in the Decree of the Head of Bapedal No.Kep-01/Bapedal/09/1995.</p> <p>While, each housing compound unit has had permitted wastewater treatment installation. For degradable waste, unit of certification has certain location for landfill with dumping system.</p>	Complied

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7.3.2	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.	<p>Domestic waste from workers compound at Estate level are disposed in landfill and located in specific Block. Type of waste is only for inorganic waste, mostly plastic waste. Besides, the organic wastes are buried at the backyard of worker's compound.</p> <p>Unit of certification also complied with regulation regarding on Domestic Wastewater Management Installation.</p> <p>Based on field visit at worker's compound Division 2 Tolan Estate and Central Compound Perlabian Estate, the domestic wastewater management already installed in accordance with its permit.</p>	Complied
7.3.3	The unit of certification does not use open fire for waste disposal.	<p>Domestic waste from workers compound at Estate level are disposed in landfill and located in specific Block. Type of waste is only for inorganic waste, mostly plastic waste. Besides, the organic wastes are buried at the backyard of worker's compound. Unit of certification also complied with regulation regarding on Domestic Wastewater Management Installation.</p>	Complied
Criteria 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	Good agricultural practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts is documented.	<p>The unit of certification has numbers of procedure for good agriculture practices to maintain soil fertility and minimize environmental impact, as available under SOP:</p> <ol style="list-style-type: none"> 1. OPM-06-01; Inorganic Fertiliser. 2. OPM-06-02; Organic Fertiliser. 3. OPM-06-03; Leaf Sampling Unit (LSU): Palm Marking. 4. OPM-06-04; Leaf Sampling Unit (LSU) and Rachis Sampling Unit (RSU) sample taking. <p>Fertilizer are applied to maintain and increase soil fertility, fertilizer applied following the fertilizer recommendation which established based on soil and leaf analysis. Due to COVID-19 pandemic, leaf analysis 2020 postponed to 2021, therefore fertilizer recommendation for 2021 is according to fertilizer recommendation 2020. Available Oil Palm Fertilizer Recommendation for PT Tolan</p>	Complied

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		<p>Tiga Indonesia – Perlabian Estate and Tolan Estate. Fertilizer application records are documented in “Monthly Manuring Program Sheet”.</p> <p>Field visit conducted to fertilizer application activity at Block E20/21 Division 3 Perlabian Estate; Type of fertilizer is Urea with dosage 0.75 kg/palms. Field visit conducted to fertilizer application activity at Block E34/35 Division 5 Tolan Estate. Type of fertilizer is Dolomite with dosage 0.5 kg/palms. Fertilizer weighing 0.5 kg in a plastic bag is distributed into each oil palms, then the applicator applied it on the circle. Based on interview, fertilizer applications are performed according to the SOP that refer Best Agriculture Practice and minimize the environmental impacts. By using methods correct type, correct target, and correct dosage. Application near the drainage are avoided.</p>	
<p>7.4.2</p>	<p>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>	<p>The latest periodical leaf sample analysis in Perlabian Estate conducted in March-April 2021 for preparing fertilizer recommendation 2022. Fertilizer recommendation 2022 were evident. Leaf Analysis Report was issued by Verdant Plant and Soil Nutrition Laboratory with Ref number 05803A1821, received date 12 Jan 2021, number of samples 136 samples (68 leaf and 68 rachis), analysis date 26 March – 28 April 2021. Sample seen Lab No.D1483; Sample type-Leaf; Estate-PLE; Div-V; Block 10B10A-10B11A; Sampling date 06/01/2021; Material Socfindo; Plant Year 2010; 62.69 Ha. Analysis result: 2.80% N; 0.163% P; 0.85% K; 0.22% Mg; 0.78% Ca; 17 ppm B; 7 ppm Cu; and 10 ppm Zn. Sample seen Lab No.D1591; Sample type-Rachis; Estate-PLE; Div-I; Block 12J18A; Sampling date 08/01/2021; Material BLRS; Plant Year 2012; 38.86 Ha. Analysis result: 0.40% N; 0.169% P; 2.27% K; 0.12% Mg; and 0.41% Ca.</p> <p>The latest periodical leaf sample analysis in Tolan Estate conducted in March-April 2021 for preparing fertilizer recommendation 2022. Fertilizer recommendation 2022 were evident. Leaf Analysis Report was issued by Verdant Plant and Soil Nutrition Laboratory with Ref number 05903A1921, received date 12 Jan 2021, number of samples 136 samples (68 leaf and 68 rachis), analysis date 26 March – 28 April 2021. Sample seen Lab No.D1499; Sample type-Leaf; Estate-TLE; Div-II; Block 98D14-98D15; Sampling date 04/01/2021; Material BLRS; Plant Year 1998; 43.08 Ha. Analysis result: 2.58% N; 0.160% P; 0.76% K; 0.26% Mg; 0.72%</p>	<p>Complied</p>

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		<p>Ca; 18 ppm B; 4 ppm Cu; and 11 ppm Zn. Sample seen Lab No.D2370; Sample type-Rachis; Estate-TLE; Div-IV; Block 01D31-D32A; Sampling date 28/01/2021; Material DUMPY; Plant Year 2001; 57.99 Ha. Analysis result: 0.42% N; 0.130% P; 2.33% K; 0.12% Mg; and 0.52% Ca.</p> <p>Soil analysis performed in 6 years interval for each block. Soil analysis result of Perlabian Estate are documented in "Hasil Analisis Pengujian Tanah" by Bangun Bandar Analytical Laboratory, PT Socfin Indonesia. Sample verified is request code No. 01/STC-soil/III/2016, Ref No. S16-021/LAB-SSPL/III/2016, taken from 42 soil sample. Sample received on 19 March 2016, analyse finished on 23 April 2016. Sample result for Lab code no. S1600162; user code PLE M21 MIX; depth 0-20 cm; 5,2 pH H₂O; 63.6% sand; 14.5% sludge; 21.8% loam; 0.44% N; 3.01% C; 61.3% P; 38.77% CEC; 0.14% K; 0.19% Ca; 0.42% Mg; and 7.53% Na.</p> <p>Soil analysis result for Perlabian Estate is available e.g. Soil Analysis Result No.494071820, receive date 7 October 2020, taken from 136 sample. Analyse date 8 April – 15 June 2021. Sample of result Lab. Code C6433; Estate TLE; Block 13L12; depth 0-20 cm; material PM01; sampling date 19 August 2020; 4.08 pH H₂O; 4.8% SOM; 0.13% N Total; 170.23 ppm P; 2.26 me/100g Al+H; 0.26 me/100g K; 0.49 me/100g Mg; 2.13 me/100g Ca; Texture 39.2% Clay; 8.4% Silt; 52.4% Sand.</p> <p>Soil analysis result for Tolan Estate is available e.g. Request code 01/STC-soil/III/2016, Ref. no. S16-020/LAB-SSPL/III/2016, taken from 27 soil sample. Sample received on 19 March 2016, analyse finished on 23 April 2016. Lab. Code S1600135; user code TLE D34 MIX; depth 0-20 cm; 4.8 pH H₂O; 54.6% sand; 10.5% sludge; 34.9% loam; 0.33% N; 0.88% C; 33.92% P; 29.70% CEC; 0.10% K; 0.64% Ca; 0.25% Mg and 0.00% Na.</p> <p>JH Agriculture Service conducted the Semi-Detailed Soil Survey in October 2009 for PT Tolan Tiga Indonesia, within the semi-detailed soil survey report, topographic condition, soil fertility status and other information has been accounted into.</p>	
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<p>7.4.3</p>	<p>A nutrient recycling strategy is in place, which include the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.</p>	<p>Nutrient recycling strategy is present at unit of certification. The company using all palm by-products for soil nutrient, such as: EFB and POME (is applied to palm nearby mill) and frond stacking.</p> <p>Permit of POME for land application as per “Keputusan Kepala Dinas Penanaman Modal dan Pelayanan Perizinan Terpadu Satu Pintu Kabupaten Labuhanbatu Selatan No.503/0002/DPMPPTSP-LS/2019 tentang Izin Pemanfaatan Air Waste Industri Minyak Kelapa Sawit pada Tanah di Perkebunan Kelapa Sawit PT Tolan Tiga Indonesia” dated 22 May 2019.</p> <p>Record of POME application are documented in “Data Volume Land Application”, as example for Perlabian Estate:</p> <table border="1" data-bbox="965 719 1379 1010"> <thead> <tr> <th>Block</th> <th>Area (Ha)</th> <th>Ditch (m)</th> </tr> </thead> <tbody> <tr> <td>05C09A</td> <td>17.49</td> <td>-</td> </tr> <tr> <td>05C10A</td> <td>29.39</td> <td>37,284</td> </tr> <tr> <td>05C11A</td> <td>27.67</td> <td>32,749</td> </tr> <tr> <td>05C12A</td> <td>21.06</td> <td>31,083</td> </tr> <tr> <td>Total</td> <td>95.61</td> <td>101,116</td> </tr> </tbody> </table> <p>Record of EFB application Perlabian Estate based on “Realisasi Aplikasi Janjang Kosong”:</p> <ul style="list-style-type: none"> - FY 2021: Div III (248.71 Ha; 9,048.35 tons); Div IV (83.13 Ha; 906.19 tons); Div V (855.99 Ha; 28,193.70 tons) - FY 2022, January: Div IV Block 21D18, 21N18 (51.25 Ha; 362.63 tons); Div V Block 07C13A, 09A19A, 09A18A, 07B18A (47.80 Ha; 1,912.87 tons). - FY 2022, February: Div I Block 21N15, 21D19 (43.35 Ha; 80.57 tons); Div II Block 06H07A, 06H06A (52.72 Ha; 1,576.36 tons); Div V Block 09A18A (20.96 Ha; 389.35 tons). 	Block	Area (Ha)	Ditch (m)	05C09A	17.49	-	05C10A	29.39	37,284	05C11A	27.67	32,749	05C12A	21.06	31,083	Total	95.61	101,116	<p>Complied</p>
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		There is no EFB and POME application in Tolan Estate due to distance from mill.																																																																							
7.4.4	Records of fertilizer inputs are maintained.	<p>Fertilizer recommendation 2021 described the fertilizer need for each Estate. Records of fertilizer inputs are available in "Monthly Manuring Program" for each Division and "Rekapitulasi Penggunaan Fertilizer Tahun 2021" for estate recapitulation.</p> <p>Record of fertilizer inputs in Perlavian Estate for period January – December 2021 and January – February 2022 are as follow:</p> <table border="1" data-bbox="965 620 1789 1227"> <thead> <tr> <th rowspan="2">Fertilizer type</th> <th colspan="2">2021</th> <th colspan="2">2022</th> </tr> <tr> <th>Plan (kg)</th> <th>Actual (kg)</th> <th>Plan (kg)</th> <th>Actual (kg)</th> </tr> </thead> <tbody> <tr> <td>Borate</td> <td>41,921</td> <td>41,616</td> <td>14,231</td> <td>-</td> </tr> <tr> <td>Dolomite</td> <td>42,216</td> <td>41,270</td> <td>174,695</td> <td>-</td> </tr> <tr> <td>Kieserite</td> <td>303,024</td> <td>298,800</td> <td>197,058</td> <td>2,488</td> </tr> <tr> <td>MOP</td> <td>808,554</td> <td>1,197,987</td> <td>1,071,797</td> <td>329,241</td> </tr> <tr> <td>NPK 12:12:17:2</td> <td>14,049</td> <td>10,200</td> <td>11,157</td> <td>-</td> </tr> <tr> <td>NPK 15:15:6:4</td> <td>11,491</td> <td>895</td> <td>8,804</td> <td>877</td> </tr> <tr> <td>TSP</td> <td>49,141</td> <td>50,935</td> <td>70,336</td> <td>-</td> </tr> <tr> <td>Urea</td> <td>949,483</td> <td>938,605</td> <td>1,138,485</td> <td>298,894</td> </tr> <tr> <td>Zincop</td> <td>77,701</td> <td>77,065</td> <td>64,703</td> <td>-</td> </tr> <tr> <td>Tricoderma</td> <td>9,039</td> <td>9,029</td> <td>9,152</td> <td>-</td> </tr> <tr> <td>Rock Phosphate</td> <td>759,598</td> <td>719,007</td> <td>805,803</td> <td>118,100</td> </tr> </tbody> </table> <p>Record of fertilizer inputs in Tolan Estate for period January – December 2021 and January – February 2022 are as follow:</p> <table border="1" data-bbox="965 1348 1789 1391"> <thead> <tr> <th>Fertilizer type</th> <th>2021</th> <th>2022</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Fertilizer type	2021		2022		Plan (kg)	Actual (kg)	Plan (kg)	Actual (kg)	Borate	41,921	41,616	14,231	-	Dolomite	42,216	41,270	174,695	-	Kieserite	303,024	298,800	197,058	2,488	MOP	808,554	1,197,987	1,071,797	329,241	NPK 12:12:17:2	14,049	10,200	11,157	-	NPK 15:15:6:4	11,491	895	8,804	877	TSP	49,141	50,935	70,336	-	Urea	949,483	938,605	1,138,485	298,894	Zincop	77,701	77,065	64,703	-	Tricoderma	9,039	9,029	9,152	-	Rock Phosphate	759,598	719,007	805,803	118,100	Fertilizer type	2021	2022				Complied
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			Plan (kg)	Actual (kg)	Plan (kg)	Actual (kg)		
		Borate	39,519	39,031	512	-		
		Dolomite	446,297	440,969	422,063	177,639		
		ZinCop	88,308	86,903	71,974	5,250		
		MOP	917,061	902,054	1,079,240	-		
		Urea	1,069,157	1,051,182	1,109,766	313,135		
		Rock Phosphate	889,218	873,676	955,088	474,492		
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>Tolan Estate: Refer to Semi Detail Soil Map Tolan Estate Scale 1:30,000 printed in 2009, produced by JH Agriculture Services. Soil type of Tolan Estate consist of Typic Endoaquept: 2% (73 Ha); Typic Kandiuult: 98% (3,553 Ha). Slope Class Map Tolan Estate Scale 1:62,500 printed in 2022. Slope class consist of < 1° (223.97 Ha); 1° - 3° (1,260.78 Ha); 3° - 6° (1,629.08 Ha); 6° - 9° (455.12 Ha); 9° - 25° (103.09 Ha). Perlabian Estate: Refer to Semi Detail Soil Map Perlabian Estate Scale 1:30,000 printed in 2009, produced by JH Agriculture Services. Soil type of Perlabian Estate consist of Typic Endoaquept: 12% (555 Ha); Typic Kandiuult: 88% (4,069 Ha). Slope Class Map Tolan Estate Scale 1:60,000. Slope class consist of 0° - 2° (2,358 Ha); 2° - 6° (2,266 Ha). There are no marginal and fragile soils was identified.</p>					Complied	
7.5.2	The replanting of palm oil is not conducted extensively on steep terrain in accordance with applicable regulations.	Unit of Certification has no steep terrain area. All the replanting area in Perlabian Estate and Tolan Estate is Flat to Undulating.					Complied	

		Based on field observation in Block L15 – M15 Div. 1 replanting area, slope class is undulating.	
7.5.3	New palm oil planting is not conducted on steep terrain in accordance with applicable regulations.	PT. Tolan Tiga Indonesia (Perlabian Estate and Tolan Estate) is an existing long-established oil palm plantation company since Dutch Era 1921 and acquisition in 1961/1962 by Indonesia government. As unit of certification, the Unit of Certification have no plan for new development.	Complied
Criteria 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.			
7.6.1	(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>PT. Tolan Tiga Indonesia (Perlabian Estate and Tolan Estate) is an existing long-established oil palm plantation company since Dutch Era 1921 and acquisition in 1961/1962 by Indonesia government. As unit of certification, the company have no plan for new development.</p> <p>Tolan Estate: Refer to Semi Detail Soil Map Tolan Estate Scale 1:30,000 printed in 2009, produced by JH Agriculture Services. Soil type of Tolan Estate consist of Typic Endoaquept: 2% (73 Ha); Typic Kandiudult: 98% (3,553 Ha). Slope Class Map Tolan Estate Scale 1:62,500 printed in 2022. Slope class consist of < 1° (223.97 Ha); 1° - 3° (1,260.78 Ha); 3° - 6° (1,629.08 Ha); 6° - 9° (455.12 Ha); 9° - 25° (103.09 Ha).</p> <p>Perlabian Estate: Refer to Semi Detail Soil Map Perlabian Estate Scale 1:30,000 printed in 2009, produced by JH Agriculture Services. Soil type of Perlabian Estate consist of Typic Endoaquept: 12% (555 Ha); Typic Kandiudult: 88% (4,069 Ha). Slope Class Map Tolan Estate Scale 1:60,000. Slope class consist of 0° - 2° (2,358 Ha); 2° - 6° (2,266 Ha).</p>	Complied
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.	Unit of Certification has no steep terrain area. All the replanting area in Perlabian Estate and Tolan Estate is Flat to Undulating.	Complied

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		Based on field observation in Block L15 – M15 Div. 1 replanting area, slope class is undulating. No extensive planting within scope Unit of Certification.	
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	<p>PT. Tolan Tiga Indonesia (Perlabian Estate and Tolan Estate) is an existing long-established oil palm plantation company since Dutch Era 1921 and acquisition in 1961/1962 by Indonesia government. As unit of certification, the company have no plan for new development.</p> <p>Tolan Estate: Refer to Semi Detail Soil Map Tolan Estate Scale 1:30,000 printed in 2009, produced by JH Agriculture Services. Soil type of Tolan Estate consist of Typic Endoaquept: 2% (73 Ha); Typic Kandiudult: 98% (3,553 Ha). Slope Class Map Tolan Estate Scale 1:62,500 printed in 2022. Slope class consist of < 1° (223.97 Ha); 1° - 3° (1,260.78 Ha); 3° - 6° (1,629.08 Ha); 6° - 9° (455.12 Ha); 9° - 25° (103.09 Ha).</p> <p>Perlabian Estate: Refer to Semi Detail Soil Map Perlabian Estate Scale 1:30,000 printed in 2009, produced by JH Agriculture Services. Soil type of Perlabian Estate consist of Typic Endoaquept: 12% (555 Ha); Typic Kandiudult: 88% (4,069 Ha). Slope Class Map Tolan Estate Scale 1:60,000. Slope class consist of 0° - 2° (2,358 Ha); 2° - 6° (2,266 Ha).</p>	Complied
Criteria 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	(C) No new planting on peatlands, regardless of depth, after 15 November 2018, in existing plantation areas, as well as in new development areas.	<p>PT. Tolan Tiga Indonesia (Perlabian Estate and Tolan Estate) is an existing long-established oil palm plantation company since Dutch Era 1921 and acquisition in 1961/1962 by Indonesia government. As unit of certification, the company have no plan for new development after 15 November 2018.</p> <p>Soil type of Tolan Estate consist of Typic Endoaquept: 2% (73 Ha); Typic Kandiudult: 98% (3,553 Ha).</p>	Not Applicable

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		Soil type of Perlabian Estate consist of Typic Endoaquept: 12% (555 Ha); Typic Kandiudult: 88% (4,069 Ha). No peatland soil within the Unit of Certification.	
7.7.2	Peat areas within the managed area are inventoried, documented and reported to the RSPO Secretariat (effective from November 15, 2018).	Soil type of Tolan Estate consist of Typic Endoaquept: 2% (73 Ha); Typic Kandiudult: 98% (3,553 Ha). Soil type of Perlabian Estate consist of Typic Endoaquept: 12% (555 Ha); Typic Kandiudult: 88% (4,069 Ha). No peatland soil within the Unit of Certification.	Not Applicable
PROCEDURAL NOTE: Maps and other documentation for peatlands are provided, prepared and shared according to the RSPO Working Group (Peatland Working Group / PLWG) audit guide (See Procedural Notes for Indicator 7.7.5 below).			
7.7.3	(C) Subsidence of peat is monitored, documented and minimised.	No peatland soil within the Unit of Certification.	Not Applicable
7.7.4	(C) Availability of implementation evidence of the water and land cover management program.	Soil type of Tolan Estate consist of Typic Endoaquept: 2% (73 Ha); Typic Kandiudult: 98% (3,553 Ha). Soil type of Perlabian Estate consist of Typic Endoaquept: 12% (555 Ha); Typic Kandiudult: 88% (4,069 Ha).	Not Applicable
7.7.5	(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.		Not Applicable

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7.7.6	(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).	PT Tolan Tiga Indonesia (Perlabian Estate and Tolan Estate) is an existing long-established oil palm plantation company since Netherland Indie Era 1921 and acquisition in 1961/1962 by Indonesia government. As unit of certification, the company have no plan for new development. Semi Detailed Soil Survey in 2009 by JH Agriculture Service, October 2009 where the document has described in detail there is no peat soils was identified.	Not Applicable
7.7.7	(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.	PT Tolan Tiga Indonesia (Perlabian Estate and Tolan Estate) is an existing long-established oil palm plantation company since Netherland Indie Era 1921 and acquisition in 1961/1962 by Indonesia government. As unit of certification, the company have no plan for new development after 15 November 2018. Semi Detailed Soil Survey in 2009 by JH Agriculture Service, October 2009 where the document has described in detail there is no peat soils was identified.	Not Applicable
Criteria 7.8: Practices maintain the quality and availability of surface and groundwater.			
7.8.1	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: 7.8.1a The unit of certification does not limit access to clean water or does not pollute the water used by the community.	Perlabian Estate and Tolan Estate has prepared water management plan under "Program Pengelolaan Air" issued on 4 January 2021. The program consists of reporting of deep-water usage; quality analysis of deep water; establish silt pit at terrace contour; making individual terrace on plant that have high risk of erosion; pesticide mixing only done in mixing area. The Estate management monitor the progress monthly. The Estate has provided access to clean water for the communities. The Estate has eliminated potential pollution to the watercourse by conduct mixing of pesticide in the mixing area only. Water management plan available in document "Water Management Plan & Praktek Meminimalisir Pengendalian Erosi dan Degradasi Tanah February 2022", such as: - Efficient of water usage in mill and estate, included water usage for FFB	Complied

		<p>process.</p> <ul style="list-style-type: none"> - Install the platform on hill. - Individual terrace. - Prevent contamination in river water: planting vetiver grass, install dam, upkeep "Bronjong". - Maintain water level and piezometer in peat areas. - Planting <i>Mucuna</i>. <p>Sample document of Perlabian Estate. Water Management Plan dated 10 February 2022, consist of</p> <ol style="list-style-type: none"> 1. Water Sources. Water source for housing worker is from groundwater using submersible pump. 2. Monitoring of water quality to ensure no pollution. 3. Facilities Maintenance. Water tank cleaning (every 6 month), maintaining of submersible pump and all installation. 4. Water usage and distribution. Schedule distribution to worker housing (morning and afternoon), water usage for Nursery. 5. Water drainage. Maintaining water drainage periodically. 	
	<p>7.8.1b Workers have adequate access to clean water.</p>	<p>The unit of certification is located near the public settlements and is close to the main road. Then, employees consume drinking water by buying ready-to-use bottled water because they consider it more practical. Even, the company also provide an accessible clean water.</p> <p>Based on interview with workers (baby nurse) at Div. 1 Perlabian Estate, clean water was provided by the Unit of Certification and distributes to all worker housing. But workers using water refilling bottle for consuming for drinking water.</p>	
<p>7.8.2</p>	<p>(C) Water courses and wetlands are protected, including the maintenance and restoration of riparian zones and other buffer zones during or before replanting, in accordance with the "RSPO Manual on BMPs for the management and rehabilitation</p>	<p>PT. Tolan Tiga Indonesia has developed a Water Management Plan, last updated in February 2022. In example, Perlabian Estate 2022 has five programs, namely the washing water tank which was held on 5 January 2021; Groundwater analysis</p>	<p>Complied</p>

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	<p>of riparian reserves" (April 2017) or Simplified Guide Management and Rehabilitation of Riparian Reserves (2018).</p>	<p>(ABT); Surface Water analysis (APU); socialization on the use of clean water and reservoir cleaning.</p> <p>The Groundwater Permit has been in accordance with the Decree of the Governor of North Sumatra Number: 546/594, dated 19 May 2020 (valid until 18 May 2023). Max allowable discharge: 380 m³ / day.</p>																																																			
<p>7.8.3</p>	<p>Mill effluent is managed according to applicable regulations. The quality of mill effluent discharged, especially BOD (Biochemical Oxygen Demand) is monitored in accordance with applicable regulations.</p>	<p>Perlabian POM has monitored the mill effluent in compliance with national regulation as per document "Laporan Hasil Analisa Waste Cair PT Tolan Tiga Indonesia year 2021.</p> <p>Measurement of mill effluent quality conducted by accreditation environmental testing and laboratory</p> <table border="1" data-bbox="960 726 1789 1372"> <thead> <tr> <th rowspan="2">Mont</th> <th rowspan="2">FFB Processing (MT)</th> <th colspan="2">POME</th> </tr> <tr> <th>Inlet (M³)</th> <th>Outlet LA (M³)</th> </tr> </thead> <tbody> <tr> <td>Jan</td> <td>13,429.31</td> <td>8,207</td> <td>8,258</td> </tr> <tr> <td>Feb</td> <td>11,937.71</td> <td>6,891</td> <td>7,536</td> </tr> <tr> <td>Mar</td> <td>15,701.07</td> <td>9,252</td> <td>6,724</td> </tr> <tr> <td>Apr</td> <td>15,329.83</td> <td>8,367</td> <td>6,181</td> </tr> <tr> <td>May</td> <td>14,173.81</td> <td>8,488</td> <td>8,203</td> </tr> <tr> <td>Jun</td> <td>16,339.08</td> <td>9,711</td> <td>9,614</td> </tr> <tr> <td>Jul</td> <td>17,307.75</td> <td>10,665</td> <td>10,659</td> </tr> <tr> <td>Aug</td> <td>18,198.82</td> <td>11,182</td> <td>13,575</td> </tr> <tr> <td>Sep</td> <td>16,312.32</td> <td>10,804</td> <td>11,198</td> </tr> <tr> <td>Oct</td> <td>13,417.21</td> <td>8,187</td> <td>5,833</td> </tr> <tr> <td>Nov</td> <td>14,633.79</td> <td>9,427</td> <td>10,059</td> </tr> </tbody> </table>	Mont	FFB Processing (MT)	POME		Inlet (M ³)	Outlet LA (M ³)	Jan	13,429.31	8,207	8,258	Feb	11,937.71	6,891	7,536	Mar	15,701.07	9,252	6,724	Apr	15,329.83	8,367	6,181	May	14,173.81	8,488	8,203	Jun	16,339.08	9,711	9,614	Jul	17,307.75	10,665	10,659	Aug	18,198.82	11,182	13,575	Sep	16,312.32	10,804	11,198	Oct	13,417.21	8,187	5,833	Nov	14,633.79	9,427	10,059	<p>Complied</p>
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Dec	12,179.72	7,555	8,729
Total	178,960.40	108,736	106,569

Parameter	Sat	Outlet Waste						BM
		Jan	Feb	Mar	Apr	May	Jun	
BOD ₅	-	497	426	427	1076	3279	2361	5000
COD	mg/l	1021	1004	893	5180	7276	4156	
pH	mg/l	7.9	7.87	8.13	8.21	7.6	7.66	6 - 9
Minyak dan lemak	mg/l	8.12	7.22	5.9	2.64	3.37	7,97	
Timbal (Pb)	mg/l	<0.0 017	<0.0017	<0.00 17	<0.00 17	<0.00 17	<0.00 17	
Tembaga (Cu)	mg/l	0.074	0.62	0.064	<0.01 5	0.14	1.22	
Cadmium (Cd)	mg/l	<0,0 022	<0,0022	<0,00 22	<0,00 22	<0,00 22	<0,00 22	
Seng (Zn)	mg/l	0.37	0.31	0.24	0.014	0.33	2.31	

Parameter	Sat	Outlet Waste						BM
		Jul	Aug	Sep	Oct	Nov	Dec	
BOD ₅	mg/l	21.5	862	1196	1283	426	759	5000
COD	mg/l	45	1565	2406	1822	781	1248	
pH	-	7.81	6.35	7.99	7.88	8.35	7,85	6 - 9
Minyak dan lemak	mg/l	3.43	11.6	10.4	9.2	10	9.37	

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		<table border="1"> <tr> <td>Timbal (Pb)</td> <td>mg/l</td> <td><0.00 17</td> <td><0.00 17</td> <td><0.00 17</td> <td><0.00 17</td> <td><0.00 17</td> <td><0.00 17</td> <td></td> </tr> <tr> <td>Tembaga (Cu)</td> <td>mg/l</td> <td>0.33</td> <td>0.015</td> <td>0.026</td> <td>0.45</td> <td>0.26</td> <td>0.31</td> <td></td> </tr> <tr> <td>Cadmium (Cd)</td> <td>mg/l</td> <td><0,00 22</td> <td><0,00 22</td> <td>0.011</td> <td><0.00 22</td> <td>0.012</td> <td>0.016</td> <td></td> </tr> <tr> <td>Seng (Zn)</td> <td>mg/l</td> <td>2.21</td> <td>0.25</td> <td>0.42</td> <td>0.33</td> <td>0.46</td> <td>0.28</td> <td></td> </tr> </table>	Timbal (Pb)	mg/l	<0.00 17	<0.00 17	<0.00 17	<0.00 17	<0.00 17	<0.00 17		Tembaga (Cu)	mg/l	0.33	0.015	0.026	0.45	0.26	0.31		Cadmium (Cd)	mg/l	<0,00 22	<0,00 22	0.011	<0.00 22	0.012	0.016		Seng (Zn)	mg/l	2.21	0.25	0.42	0.33	0.46	0.28														
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Seng (Zn)	mg/l	2.21	0.25	0.42	0.33	0.46	0.28																																												
7.8.4	Mill water use per tonne of FFB is monitored and recorded.	<p>PT Tolan Tiga Indonesia - Perlabian POM has shown the document of mill water use per tonne of Fresh Fruit Bunches (FFB) in 2021 as per document "Laporan Pemakaian Air Pabrik per MT FFB tahun 2021". Standard 1.00</p> <table border="1"> <thead> <tr> <th>Month</th> <th>FFB (MT)</th> <th>Water consumption (M3)</th> <th>Pres (%)</th> </tr> </thead> <tbody> <tr><td>Jan</td><td>13,429</td><td>12,905</td><td>0.96</td></tr> <tr><td>Feb</td><td>11,937</td><td>11,055</td><td>0.93</td></tr> <tr><td>Mar</td><td>15,701</td><td>14,123</td><td>0.90</td></tr> <tr><td>Apr</td><td>15,329</td><td>14,820</td><td>0.97</td></tr> <tr><td>May</td><td>14,173</td><td>14,495</td><td>1.02</td></tr> <tr><td>Jun</td><td>16,339</td><td>19,477</td><td>1.19</td></tr> <tr><td>Jul</td><td>17,307</td><td>19,982</td><td>1.15</td></tr> <tr><td>Aug</td><td>18,198</td><td>20,043</td><td>1.10</td></tr> <tr><td>Sep</td><td>16,312</td><td>20,633</td><td>1.26</td></tr> <tr><td>Oct</td><td>13,417</td><td>14,840</td><td>1.11</td></tr> <tr><td>Nov</td><td>14,633</td><td>15,616</td><td>1.07</td></tr> </tbody> </table>	Month	FFB (MT)	Water consumption (M3)	Pres (%)	Jan	13,429	12,905	0.96	Feb	11,937	11,055	0.93	Mar	15,701	14,123	0.90	Apr	15,329	14,820	0.97	May	14,173	14,495	1.02	Jun	16,339	19,477	1.19	Jul	17,307	19,982	1.15	Aug	18,198	20,043	1.10	Sep	16,312	20,633	1.26	Oct	13,417	14,840	1.11	Nov	14,633	15,616	1.07	Complied
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		Dec	12,179	15,140	1.24		
		Total	178,960	193,129	1.08		

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>Unit of certification has prepared a strategy in effort to reduce and mitigate pollution and emission. Monitoring of pollution and emission quality for plantation has been planned and implemented, e.g. air quality ambient for boiler and power generator, water quality test for surface and ground water, effluent water quality, noise level, etc. The monitoring result is incorporated in RKL/RPL (environmental management and monitoring plan) and reported regularly to the government.</p> <p>Record of HSD Oil usage in Perlabian POM:</p> <table border="1"> <thead> <tr> <th>Year</th> <th>TBS</th> <th>Volume</th> <th>Presentase (%)</th> </tr> </thead> <tbody> <tr> <td>2020</td> <td>93.225</td> <td>127.537</td> <td>1.37</td> </tr> <tr> <td>2021</td> <td>92.745</td> <td>147.634</td> <td>1.59</td> </tr> </tbody> </table> <p>Record of HSD Oil usage in Tolan POM:</p> <table border="1"> <thead> <tr> <th>Tahun</th> <th>TBS</th> <th>Volume</th> <th>Presentase (%)</th> </tr> </thead> <tbody> <tr> <td>2020</td> <td>86.276.760</td> <td>144.544.4</td> <td>1.68</td> </tr> <tr> <td>2021</td> <td>87.330.240</td> <td>155.698</td> <td>1.78</td> </tr> </tbody> </table>	Year	TBS	Volume	Presentase (%)	2020	93.225	127.537	1.37	2021	92.745	147.634	1.59	Tahun	TBS	Volume	Presentase (%)	2020	86.276.760	144.544.4	1.68	2021	87.330.240	155.698	1.78	Complied
Year	TBS	Volume	Presentase (%)																								
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Criteria 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.

7.10.1	<p>(C) GHG emissions for the unit of certification are identified and assessed. Plans to reduce or minimize GHG emissions are implemented, monitored through the PalmGHG calculator, and reported publicly.</p>	<p>PT Tolan Tiga Indonesia – Perlabian POM has procedure Calculation and Mitigation of Green House Gas Emission No.ENC 01-12/04-03-2019/Rev.1 dated 18 March 2019, whereby provide guidance to register source of emissions as result of company operation, mointor and reduce the use of materials emitting GHG emission, calculate GHG emission from company operational activities. Source of emission inventory from estate operation: use of inorganic fertilizer Urea (N), Dolomite (CaO), MOP (K₂O), Rock Phospate (P₂O₅), use of pesticide, use HSD fuel, planted area, mature oil palm, FFB production, distance estate to POM, distance POM to bulking tank, OER %, KER %, presence of methane capture facility, etc.</p> <p>Handling emission from steam boiler, consist of guideline for minimizing soot pollution/particulate: ensure fibre and shell feed; minimize shell to prevent black smoke; setting air damper for ignition, avoid excess air; dumping grate on regular basis, to minimize unburn fuel; shoot blowing every 4 hours to clean heat exchanger pipes; ensure dust collector operating in good manner; monitor boiler exhaust emission through smoke density meter; monitor boiler emission every 6 months by independent laboratory; record any problem.</p> <p>Handling emission from engine generator, consist of guideline for minimizing emission: ensure the generator operating at permitted load (80% from design); replace air filter element (every 1,250 hours), replace fuel filter (every 500 hours), replace oil filter (250 hours) – on regular basis; replace engine lubricant every 250 hours; should black smoke sighted – check engine load; should the black smoke sighted – check injection pump; monitor engine emission every 6 months by independent laboratory;</p> <p>Record of HSD Oil Use year 2021</p> <table border="1" data-bbox="958 1177 1816 1375"> <thead> <tr> <th>Month</th> <th>Production (Ton)</th> <th>HSD Oil (Liter)</th> <th>Presentase (%)</th> </tr> </thead> <tbody> <tr> <td>Jan</td> <td>12,913</td> <td>13,597</td> <td>1.89</td> </tr> <tr> <td>Feb</td> <td>12,913</td> <td>11,935</td> <td>1.76</td> </tr> <tr> <td>Mar</td> <td>12,913</td> <td>12,884</td> <td>1.54</td> </tr> </tbody> </table>	Month	Production (Ton)	HSD Oil (Liter)	Presentase (%)	Jan	12,913	13,597	1.89	Feb	12,913	11,935	1.76	Mar	12,913	12,884	1.54	Complied
Month	Production (Ton)	HSD Oil (Liter)	Presentase (%)																
Jan	12,913	13,597	1.89																
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Apr	12,913	11,912	1.49
May	12,913	9,559	1.3
Jun	12,913	11,464	1.37
Jul	12,913	11,271	1.32
Aug	12,913	11,831	1.31
Sep	12,913	13,241	1.65
Oct	12,913	13,572	2.11
Nov	12,913	13,036	1.77
Dec	12,913	13,332	1.83
Total	154,956	147,634	1.6

Fertilizer Application record year 2021:

Fertilizer type	2021 (Kg)
Bonitro	7,9
Borate	41,616.20
Dolomite	41,270.00
Kiesrite	298,800.19
MOP	1,197,987.50
NPK 12.12.17.2	10,200.01
NPK 15.15.6.4	895,45
SA/ZA	141,0

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		<table border="1"> <tr> <td>TSP</td> <td>50,935</td> </tr> <tr> <td>UREA</td> <td>938,605.64</td> </tr> <tr> <td>ZINCOP</td> <td>77,065.90</td> </tr> <tr> <td>RP</td> <td>719,007.75</td> </tr> </table>	TSP	50,935	UREA	938,605.64	ZINCOP	77,065.90	RP	719,007.75	
TSP	50,935										
UREA	938,605.64										
ZINCOP	77,065.90										
RP	719,007.75										
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).	PT. Tolan Tiga Indonesia (Perlabian Estate and Tolan Estate) is an existing long-established oil palm plantation company since Dutch Era 1921 and acquisition in 1961/1962 by Indonesia government. As unit of certification, the company have no plan for new development. To monitor GHG emission, Unit of Certification is calculating and submit periodically the GHG value through PalmGHG Calculator.	Complied								
7.10.3	(C) Other significant pollutant identification results are available and plans to reduce or minimize them are implemented and monitored.	PT. Tolan Tiga Indonesia (Perlabian Estate and Tolan Estate) is an existing long-established oil palm plantation company since Dutch Era 1921 and acquisition in 1961/1962 by Indonesia government. As unit of certification, the company have no plan for new development. To monitor GHG emission, Unit of Certification is calculating and submit periodically the GHG value through PalmGHG Calculator.	Complied								
Criteria 7.11: Fire is not used for preparing land and is prevented in the managed area.											
7.11.1	(C) Land for new planting or replanting is not prepared by burning.	<p>PT. Tolan Tiga Indonesia (Perlabian Estate and Tolan Estate) is an existing long-established oil palm plantation company since Dutch Era 1921 and acquisition in 1961/1962 by Indonesia government. As unit of certification, the company have no plan for new development.</p> <p>The current activities only replanting which using manual method, tractor ploughing, cover crops planting and oil palm planting.</p> <p>Based on field visit to replanting area in Block L15 – M15 Div. 1 Perlabian Estate, land preparation by burning was not proven.</p>	Complied								

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7.11.2	The unit of certification establishes fire prevention and control measures for lands that are directly managed by the unit of certification.	Unit of Certification has list of "Sarana dan Prasarana Pengendalian Kebakaran Lahan Perkebunan" where the list fire equipment as referred to Minister of Agriculture Regulation No. 05/PERMENTAN/KB.410/ 1/2018. Based on field visit to replanting area in Block L15 – M15 Div. 1 Perlabian Estate, Fire Monitoring Tower is available in place.	Complied
7.11.3	The unit of certification engages stakeholders in adjacent locations for fire prevention and control measures.	Unit of certification engages stakeholders in adjacent locations for fire prevention and control measures, such as surrounding villages of Tolan Estate are Meranti village; Seri Pinang village; Kampung Bangun. Based on phone interview with representative of Meranti Village, Unit of Certification is periodically dissemination of fire prevention and involving surrounding communities.	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.			
7.12.1	(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. 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).	PT. Tolan Tiga Indonesia (Perlabian Estate and Tolan Estate) is an existing long-established oil palm plantation company since Dutch Era 1921 and acquisition in 1961/1962 by Indonesia government. As unit of certification, the company have no plan for new development after November 2005 or 15 November 2018. HCV Assessment has been conducted in 2009 by "Yayasan Kelapa Sawit Berkelanjutan Indonesia (YASBI)". When HCV Assessment conducted, historical analysis of Land Use Change of PT Tolan Tiga Indonesia are available in the HCV Assessment Report. Plantation development of PT. Tolan Tiga Indonesia carried out since Dutch Era, therefore RSPO LUCA was not applicable for this unit of certification. However, as a group, SIPEF has been submit the disclosure of liability to RSPO Secretariat since 2014. Where, there is no liability occurs in PT Tolan Tiga Indonesia.	Complied

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7.12.2	<p>(C) HCV and HCS forests, and other conservation areas are identified as follows:</p> <p>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>PT. Tolan Tiga Indonesia (Perlabian Estate and Tolan Estate) is an existing long-established oil palm plantation company since Dutch Era 1921 and acquisition in 1961/1962 by Indonesia government.</p> <p>HCV Assessment has been conducted in 2009 by “Yayasan Kelapa Sawit Berkelanjutan Indonesia (YASBI)”. HCV Assessment is using reference of Indonesian Toolkit 2008 and the HCV assessment team are registered by RSPO- approved assessor. As unit of certification, the company have no plan for new development after November 2005 or 15 November 2018.</p>	Complied
	<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>As unit of certification, PT Tolan Tiga Indonesia have no plan for new development after November 2005 or 15 November 2018. Therefore HCV-HCS Assessment is not applicable.</p>	
7.12.3	<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>As unit of certification, PT Tolan Tiga Indonesia have no plan for new development after November 2005 or 15 November 2018. Therefore HFCL Assessment is not relevant.</p>	Complied
7.12.4	<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</p>	<p>HCV Assessment has been conducted in 2009 by “Yayasan Kelapa Sawit Berkelanjutan Indonesia (YASBI)”. HCV Assessment is using reference of Indonesian Toolkit 2008 and the HCV assessment team are registered by RSPO- approved assessor.</p> <p>According to HCV Assessment Report 2009, HCV attribute that was identified are:</p> <ul style="list-style-type: none"> - HCV area Perlabian Estate was 59.38 Ha, comprise of area of HCV 1 (overlapping with) and HCV 4 of 55.93 Ha; and HCV 6 of 3.45 Ha. - HCV Area in Tolan Estate was 55.99 Ha comprise of HCV 1 on 32.99 Ha and (some overlapping with) HCV 4 of 55.71 Ha; HCV 6 of 0.19 Ha. 	Complied

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	relevant wider landscape level considerations (where these are identified).	Total HCV area in PT. Tolan Tiga Indonesia are 115.37 Ha. Most of HCV area in unit of certification is riparian, with commitment to maintain this area is through leaving the area to grow naturally and not replanted. - Based on field visit to replanting area in Block L15 and M15 Division 1 Perlabian Estate, sighted that three rows old palm crops along riparian area in Alangan III River remains standing (not replanted).	
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.	HCV Assessment has been conducted in 2009 by “Yayasan Kelapa Sawit Berkelanjutan Indonesia (YASBI)”. HCV Assessment is using reference of Indonesian Toolkit 2008 and the HCV assessment team are registered by RSPO-approved assessor. As unit of certification, the company have no plan for new development after November 2005 or 15 November 2018. Based on HCV identification, no peatland was occurring in unit of certification. Also, no indigenous/customary rights is in place.	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 for the company is found to capture, harm, collect, trade, possess or kill these species.	HCV programme that implemented by unit of certification is more concern to monitor any threat activities near watercourse/riparian and wildlife animal monitoring. Perlabian Estate: HCV Area Monitoring Checklist dated 28 February 2022. All identified HCV in well condition and managed. HCV 6: Cemetery (Block N18 Division 1 Perlabian Estate) – No RTE species founded, common birds, civet and long tail macaque are identified; HCV 4: Buffer zone (Block I4 Division 2 Perlabian Estate) – No RTE species found, snake, chicken and common bird founded. Tolan Estate: HCV Area Monitoring Checklist dated 28 February 2022. All identified HCV in well condition and managed. HCV 4: Reservoir Kwangheng (Block C30 Division 5 Tolan Estate) – No RTE species found, monitor lizard, macaque, and leopard cat founded.	Complied
7.12.7	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.	During field visit in HCV area Perlabian Estate and Tolan Estate, identified HCV area was maintained and well monitor.	Complied

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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>As unit of certification PT. Tolan Tiga Indonesia (Perlabian Estate and Tolan Estate) is an existing long-established oil palm plantation company since Dutch Era 1921 and acquisition in 1961/1962 by Indonesia government. As unit of certification, the company have no plan for new development after November 2005 or 15 November 2018. Disclosure of liability have been submitted in 2014, including Land Use Change Analysis (LUCA). According to LUCA result, there is no Remediation and Compensation is occurs in unit of certification.</p>	Complied
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Appendix B: GHG Reporting Executive Summary

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

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

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

Emission per product	tCO ₂ e/tProduct
CPO	0.48
PK	0.48

Extraction	%
OER	22.17
KER	5.78

Production	t/yr
FFB Process	179,192.55
CPO Produced	39,734.16
PKO Produced	10,322.98

Land Use	Ha
OP Planted Area	7,815.62
OP Planted on peat	0.00
Conservation (forested)	0.00
Conservation (non-forested)	141.11
Total	7,956.73

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	63,290.42	0.35	0.00	0.00	0.00	0.00	63,290.42	0.35
CO ₂ Emission from fertilizer	6,683.16	0.04	0.00	0.00	0.00	0.00	6,683.16	0.04
NO ₂ Emission	5,682.67	0.03	0.00	0.00	0.00	0.00	5,682.67	0.03
Fuel Consumption	904.81	0.01	0.00	0.00	0.00	0.00	904.81	0.01
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sink								
Crop Sequestration	-58,316.02	-0.33	0.00	0.00	0.00	0.00	-58,316.02	-0.33
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	18,245.05	0.10	0.00	0.00	0.00	0.00	18,245.05	0.10

*Note: Includes both estates and smallholders

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	4,069.63	0.02
Fuel Consumption	824.96	0.00
Grid Electricity Utilization	674.26	0.02
Credit		
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
Total	5,568.85	0.03

Summary of Kernel Crusher Emission and Credit (if applicable)

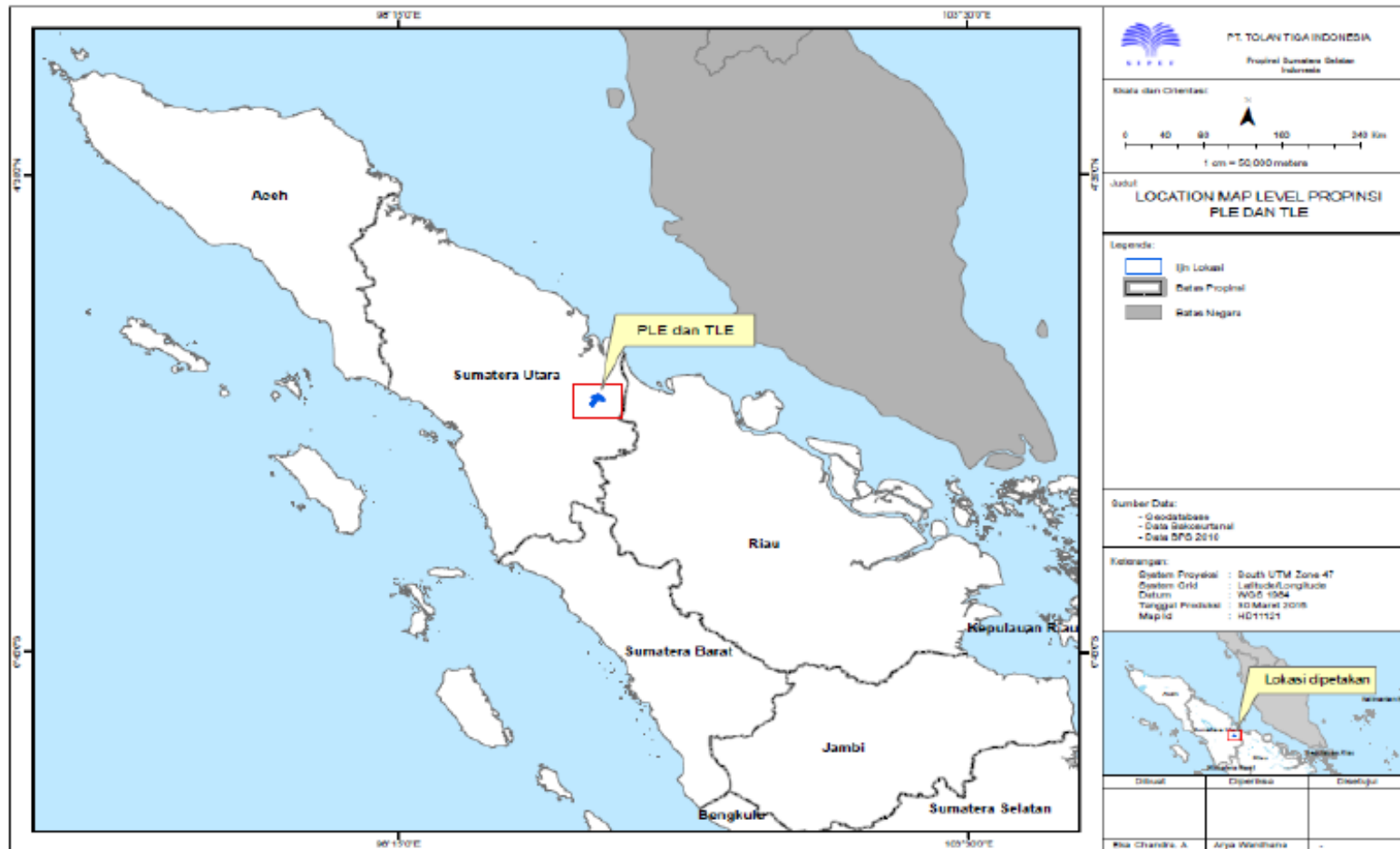
Emissions	tCO ₂ e
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	0.00
Total Crusher emissions	0.00

*This mill has no kernel crusher operation.

Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	0.00
Divert to anaerobic diversion (%)	0.00

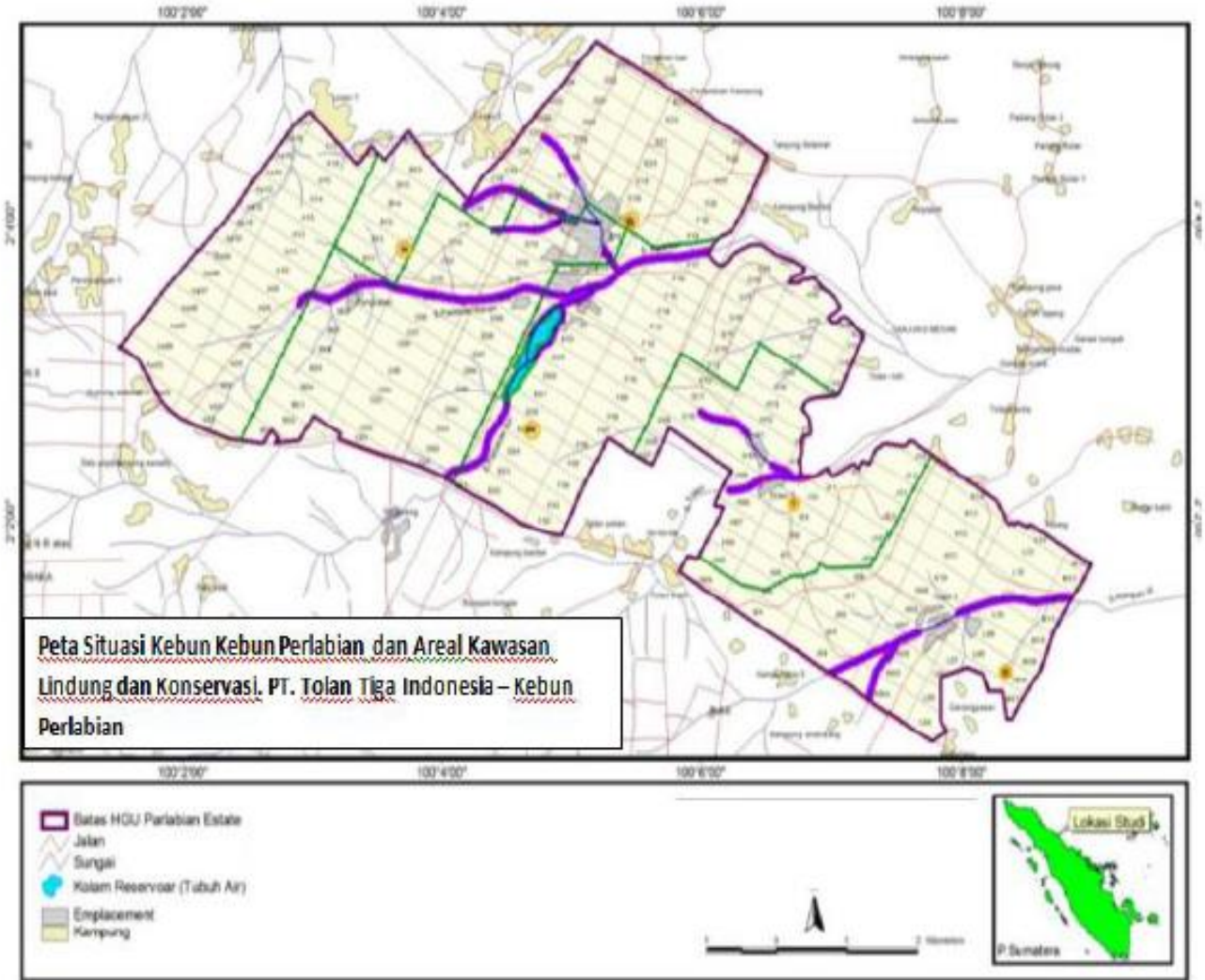
POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	0.00
Divert to methane captured (flaring) (%)	0.00
Divert to methane captured (energy generation) (%)	0.00

Appendix C: Location Map of Certification Unit and Supply bases

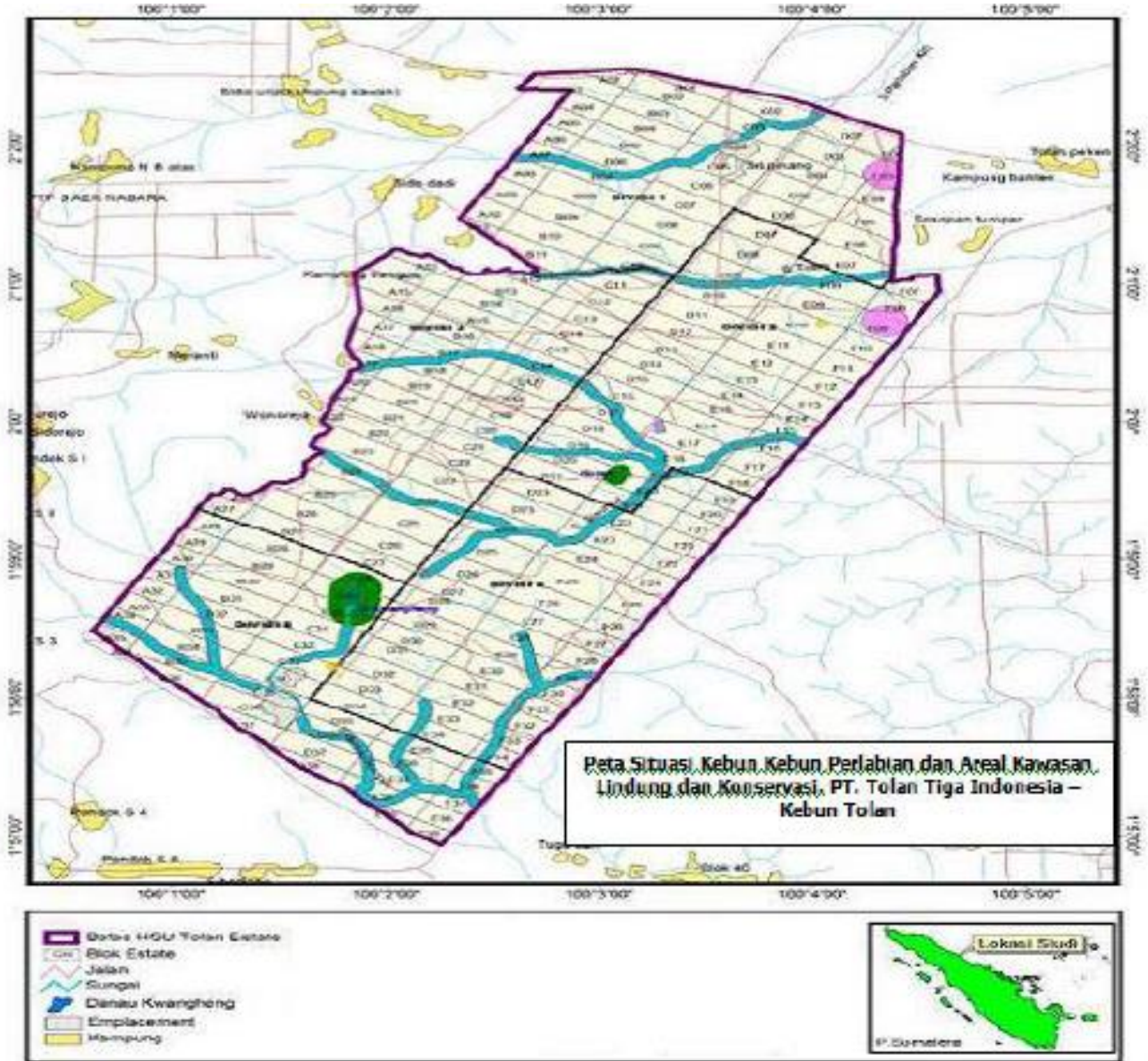


Appendix D: Estate Field Map

Perlabian Estate



Tolan Estate



Appendix E: List of Smallholder Registered and sampled

(Not Applicable) No smallholders within this scope

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
PLE	Perlabian Estate
PLM	Perlabian Mill
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
TLE	Tolan Estate
SCCS	Supply Chain Certification Standard
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure