

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

- Initial Assessment
- Annual Surveillance Assessment (Choose an item.)
- Recertification Assessment (RA 1)
- Extension of Scope

Client Company name (Parent Company): PT Inti Indosawit Subur
Client company Address: Jl. MH. Thamrin No.31, Jakarta 10230, Indonesia
Certification Unit: PT. Rigunas Agri Utama – Bungo Tebo Palm Oil Mill
Location of Certification Unit: Tuo Sumay & Pinang Belai Village, Sumay & Serai Serumpun Sub District, Tebo Regency, Jambi Province, Indonesia
Date of Final Report: 13/05/2022

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Section 1: Scope of the Assessment

1. Company Details			
Parent Company	PT. Inti Indosawit Subur		
RSPO Membership Number	1-0022-06-000-00	Membership Approval Date	6 th February 2006
Address	Jl. MH. Thamrin No 31 Jakarta 10230, Indonesia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	PT. Rigunas Agri Utama – Bungo Tebo Palm Oil Mill		
Location / Address	Tuo Sumay & Pinang Belai Village, Sumay & Serai Serumpun Sub District, Tebo Regency, Jambi Province, Indonesia		
Website	www.asianagri.com		
Management Representative	Mr. Putu Ghryate Yonata Aksa	E-mail	Putu_Aksa@asianagri.com
Telephone	021 2301119	Facsimile	021 2301120

2. Certification Information			
Certificate Number	RSPO 620917	Certificate Start Date	13/05/2022
Date of First Certification	03/12/2015	Certificate Expiry Date	12/05/2027
Scope of Certification	Production of Palm Oil and Palm Kernel		
Visit Objectives	<ul style="list-style-type: none"> To conduct onsite audit as a continuation of previous remote audit for Recertification with 50% increase in sampling due to combining 2 years' (2020 and 2021) audit. Determination of the conformity and consistency of Bungo Tebo POM and its supply bases with RSPO Principle and 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 type="checkbox"/> Annual Surveillance Assessment (ASA Choose an item.) <input checked="" type="checkbox"/> Recertification Assessment (RA 1) <input type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input type="checkbox"/> Choose an item. <input checked="" type="checkbox"/> Indonesia National Interpretation 2020 for RSPO P&C 2018 for the Production of Sustainable Palm Oil		
Supply Chain Module	<input type="checkbox"/> Identity Preserved; <input checked="" type="checkbox"/> Mass Balance	Mill Capacity	60 MT/hour
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
ID05/65250	ISO 14001:2015	SGS	10 June 2023
EU-ISCC-Cert-DE100-02730121	ISCC	SGS	28 June 2022
BSI-ISPO 619412	ISPO	BSI Group Indonesia	5 December 2021

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Bungo Tebo Palm Oil Mill	Village of Tuo Sumay (sub-District of Sumay) and Pinang Belai (sub-District of Serai Serumpun), Tebo Regency, Jambi Province.	1° 20' 46.02" S	102° 27' 17.04" E
Bungo Tebo Estate	Village of Tuo Sumay (sub-District of Sumay) and Pinang Belai (sub-District of Serai Serumpun), Tebo Regency, Jambi Province	01° 15' 13.00" S	102° 21' 39.00" E
Koperasi Tanjung Dani Sakti	Tanjung Dani Hamlet, Tuo Sumay Village, Sumay sub-District, Tebo Regency, Jambi Province	01° 19' 17.00" S	102° 24' 36.00" E
Koperasi Sumay Jaya	Tuo Sumay Village, Sumay sub-District, Tebo Regency, Jambi Province	01° 23' 02.00" S	102° 26' 13.00" E
Koperasi Sumber Usaha	Tuo Sumay Village, Sumay sub-District, Tebo Regency, Jambi Province	01° 23' 06.00" S	102° 26' 49.00" E
Koperasi Sawit Bina Tani	Sungai Rambai Village, Tebo Ulu sub-District, Tebo Regency, Jambi Province	01° 22' 31.00" S	102° 23' 54.00" E
Koperasi Belarik Jaya	Jati Belarik Village, Sumay sub-District, Tebo Regency, Jambi Province	01° 27' 36.00" S	102° 27' 06.00" E
Koperasi Sawit Tambara Jaya	Tambun Arang Village, Sumay sub-District, Tebo Regency, Jambi Province	01° 26' 16.00" S	102° 28' 02.00" E
Koperasi Tunas Harapan	Teluk Langkap Village, Sumay sub-District, Tebo Regency, Jambi Province	01° 26' 02.00" S	102° 26' 18.00" E
Koperasi Sejahtera Tani	Punti Kalo Village, Sumay sub-District, Tebo Regency, Jambi Province	01° 25' 29.00" S	102° 25' 31.00" E
Koperasi Produksi Tani Mandiri	Kandang Village, Tebo Tengah sub-District, Tebo Regency, Jambi Province	01° 26' 34.00" S	102° 29' 24.00" E
Koperasi Tanjung Jaya Bersama	Tuo Sumay Village, Sumay sub-District, Tebo Regency, Jambi Province	01° 19' 40.00" S	102° 28' 29.00" E
Koperasi Tanjung Aur Duri	Teriti Village, Sumay sub-District, Tebo Regency, Jambi Province	01° 19' 38.00" S	102° 28' 03.00" E

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Koperasi Sawit Sumay Makmur	Pinang Belai Village, Serai Serumpun sub-District, Tebo Regency, Jambi Province	01° 16' 58.00" S	102° 21' 50.00" E
Koperasi Sawit Makmur	Sekutur Jaya Village, Serai Serumpun sub-District, Tebo Regency, Jambi Province	01° 15' 34.00" S	102° 20' 01.00" E
Koperasi Barokah	Teluk Kasai Rambahan Village, Tebo Ulu sub-District, Tebo Regency, Jambi Province	01° 18' 00.00" S	102° 18' 40.00" E
Koperasi Sawit Keluarga Sejahtera	Bungo Tanjung Village, Tebo Ulu sub-District, Tebo Regency, Jambi Province	01° 12' 46.80" S	102° 18' 57.70" E
Koperasi Sawit Makmur Bersama	Bukit Pamuan Village, Serai Serumpun sub-District, Tebo Regency, Jambi Province	01° 12' 15.50" S	102° 18' 33.80" E
Koperasi Sawit Karya Makmur	Napal Putih Village, Serai Serumpun sub-District, Tebo Regency, Jambi Province	01° 11' 02.40" S	102° 17' 01.30" E
Koperasi Sawit Tanduk Perkasa	Suko Makmur Village, Serai Serumpun sub-District, Tebo Regency, Jambi Province	01° 09' 05.00" S	102° 13' 55.50" E

5. Description of Supply Base

Estate / Smallholders	New Planting Development		Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
	<input checked="" type="checkbox"/> No (no change in total planted area)	<input type="checkbox"/> Yes (please refer to Principle 7 for details)					
Bungo Tebo Estate	<input checked="" type="checkbox"/>	<input type="checkbox"/>	2,489.38	65.00	111.26	2,665.64	93.39
Koperasi Tanjung Dani Sakti (110 smallholder's)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	220.00	0	0	220.00	100
Koperasi Sumay Jaya (116 smallholders)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	232.00	0	0	232.00	100
Koperasi Sumber Usaha (92 smallholders)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	184.00	0	0	184.00	100
Koperasi Sawit Bina Tani (119 smallholders)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	238.00	0	0	238.00	100
Koperasi Belarik Jaya (91 smallholders)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	182.00	0	0	182.00	100
Koperasi Sawit Tambara Jaya (109 smallholders)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	218.00	0	0	218.00	100
Koperasi Tunas Harapan (72 smallholders)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	144.00	0	0	144.00	100
Koperasi Sejahtera Tani (44 smallholders)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	88.00	0	0	88.00	100

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Koperasi Produksi Tani Mandiri (79 smallholders)	158.00	0	0	158.00	100
Koperasi Tanjung Jaya Bersama (34 smallholders)	68.00	0	0	68.00	100
Koperasi Tanjung Aur Duri (34 smallholders)	68.00	0	0	68.00	100
Koperasi Sawit Sumay Makmur (429 smallholders)	858.00	0	0	858.00	100
Koperasi Sawit Makmur (336 smallholders)	672.00	0	0	672.00	100
Koperasi Barokah (186 smallholders)	372.00	0	0	372.00	100
Koperasi Sawit Keluarga Sejahtera (68 smallholders)	136.00	0	0	136.00	100
Koperasi Sawit Makmur Bersama (314 smallholders)	628.00	0	0	628.00	100
Koperasi Sawit Karya Makmur (355 smallholders)	710.00	0	0	710.00	100
Koperasi Sawit Tanduk Perkasa (369 smallholders)	738.00	0	0	738.00	100
Total	8,403.38	65.00	111.26	8,579.64	97.95

6. Plantings & Cycle

Estate / Smallholders	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Bungo Tebo Estate	1,233.38	1,256.00	-	-	-	1,256.00	1,233.38
Koperasi Tanjung Dani Sakti	-	-	-	220.00	-	220.00	-
Koperasi Sumay Jaya	-	-	-	232.00	-	232.00	-
Koperasi Sumber Usaha	-	-	134.00	50.00	-	184.00	-
Koperasi Sawit Bina Tani	-	-	112.00	126.00	-	238.00	-
Koperasi Belarik Jaya	-	-	64.00	118.00	-	182.00	-
Koperasi Sawit Tambara Jaya	-	-	26.00	192.00	-	218.00	-
Koperasi Tunas Harapan	-	-	12.00	132.00	-	144.00	-
Koperasi Sejahtera Tani	-	-	28.00	60.00	-	88.00	-
Koperasi Produksi Tani Mandiri	-	-	158.00	-	-	158.00	-

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Koperasi Tanjung Jaya Bersama	-	-	68.00	-	-	68.00	-
Koperasi Tanjung Aur Duri	-	-	42.00	26.00	-	68.00	-
Koperasi Sawit Sumay Makmur	-	-	-	858.00	-	858.00	-
Koperasi Sawit Makmur	-	-	-	672.00	-	672.00	-
Koperasi Barokah	-	-	-	372.00	-	372.00	-
Koperasi Sawit Keluarga Sejahtera	-	-	-	136.00	-	136.00	-
Koperasi Sawit Makmur Bersama	-	-	-	628.00	-	628.00	-
Koperasi Sawit Karya Makmur	-	-	-	710.00	-	710.00	-
Koperasi Sawit Tanduk Perkasa	-	-	222.00	516.00	-	738.00	-
Total (ha)	1,233.38	1,256.00	866.00	5,048.00	0	7,170.00	1,233.38
Note:							

7. Summary of Certified Tonnage of FFB (Own Certified Scope)				
Estate / Smallholders	Tonnage / year			
	Estimated (Dec 2019 – Nov 2021)	Actual (Oct 2019 – Oct 2021)		Forecast (Dec 2021 – Nov 2022)
		<small>Previous license period (Oct 2019 – Nov 2020)</small>	<small>Current license period (Dec 2020 – Oct 2021)</small>	
Bungo Tebo Estate	21,759	30,788	31,514	42,916
Koperasi Tanjung Dani Sakti	3,881	2235	6,109	2,149
Koperasi Sumay Jaya	4,092	1890	4,927	2,434
Koperasi Sumber Usaha	2,911	1725	1,207	1,453
Koperasi Sawit Bina Tani	3,739	770	556	1,767
Koperasi Belarik Jaya	3,104	1630	1,703	2,161
Koperasi Sawit Tambara Jaya	3,373	2044	1,825	2,566
Koperasi Tunas Harapan	2,283	2891	115	1,718
Koperasi Sejahtera Tani	1,508	1992	2,714	1,328
Koperasi Produksi Tani Mandiri	3,127	2980	1,207	3,288
Koperasi Tanjung Jaya Bersama	1,417	874	437	1,649
Koperasi Tanjung Aur Duri	616	137	423	297
Koperasi Sawit Sumay Makmur	15,134	9786	18,929	5,859
Koperasi Sawit Makmur	13,573	5553	9,673	8,361

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Koperasi Barokah	6,356	4296	10,754	3,781
Koperasi Sawit Keluarga Sejahtera	2,683	1,582	2,337	1,759
Koperasi Sawit Makmur Bersama	12,872	9,860	10,662	11,595
Koperasi Sawit Karya Makmur	13,894	9,031	10,068	9,207
Koperasi Sawit Tanduk Perkasa	12,787	10,976	12,202	8,588
Extension volume	136,777			
Total	265,886		228,402	112,877

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

Estate / Smallholders	Tonnage / year			Forecast (Dec 2021 – Nov 2022)
	Estimated (Dec 2019 – Nov 2021)	Actual (Oct 2019 – Oct 2021)		
		Previous license period (Oct 2019 – Nov 2020)	Current license period (Dec 2020 – Oct 2021)	
Nil		Nil	Nil	
Total		N/A		

9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)

Out growers / smallholders	Tonnage / year			Forecast (Dec 2021 – Nov 2022)
	Estimated (Dec 2019 – Nov 2021)	Actual (Oct 2019 – Oct 2021)		
		Previous license period (Oct 2019 – Nov 2020)	Current license period (Dec 2020 – Oct 2021)	
Third party Supplier	-	134,173.57	78,360.22	-
Total	-	212,533.79		-

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	Oct 2019	9,875.99	14,039.94	23,915.93
2	Nov 2019	7,901.59	10,115.77	18,017.36
3	Dec 2019	6,739.03	8,260.33	14,999.36
4	Jan 2020	5,325.09	8,781.43	14,106.52

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5	Feb 2020	4,998.40	8,234.09	13,232.49
6	Mar 2020	5,266.45	8,445.73	13,712.18
7	Apr 2020	4,707.75	6,903.93	11,611.68
8	May 2020	3,951.23	7,790.63	11,741.86
9	Jun 2020	3,987.01	9,468.90	13,455.91
10	Jul 2020	2,977.02	11,179.44	14,156.46
11	Aug 2020	5,884.20	13,448.18	19,332.38
12	Sept 2020	12,754.10	9,653.40	22,407.50
13	Oct 2020	14,157.77	9,875.44	24,033.21
14	Nov 2020	12,513.92	7,976.37	20,490.29
15	Dec 2020	13,685.35	9,333.65	23,019.00
16	Jan 2021	10,785.37	6,869.35	17,654.72
17	Feb 2021	10,658.58	5,602.62	16,261.20
18	Mar 2021	12,307.93	6,636.62	18,944.55
19	Apr 2021	11,789.62	7,963.36	19,752.98
20	May 2021	9,555.19	7,002.28	16,557.47
21	Jun 2021	11,538.28	9,089.52	20,627.80
22	Jul 2021	12,256.67	7,089.92	19,346.59
23	Aug 2021	12,231.08	6,354.48	18,585.56
24	Sept 2021	11,323.07	6,211.77	17,534.84
25	Oct 2021	11,231.06	6,206.64	17,437.70
TOTAL		228,401.75	212,533.79	440,935.54

10. Summary of Certified Tonnage (not applicable for ISS)			
Estimated (Dec 2019 – Nov 2021)	Actual (Oct 2019 – Oct 2021)		Forecast (Dec 2021 – Nov 2022)
	Previous license period (Oct 2019 – Nov 2020)	Current license period (Dec 2020 – Oct 2021)	
FFB	FFB		FFB
265,886* mt	101,040	127,362	112,877 mt
	228,402 mt		
CPO (OER: 21.41 %)	CPO (OER: 20.94 %)		CPO (OER: 21.21 %)
55,769* mt	21,591	26,241	23,935 mt
	47,832 mt		
PK (KER: 5.50 %)	PK (KER: 5.36 %)		PK (KER: 5.50 %)

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14,527* mt	5,448	6,799	6,208 mt
	12,247 mt		
Note: *Volume extension – FFB = 136,777mt; CPO = 28,286mt; PK = 7,426mt			

10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1	Oct 2019	2,160.07	554.60
2	Nov 2019	1,744.57	408.88
3	Dec 2019	1,522.96	355.06
4	Jan 2020	1,200.80	303.31
5	Feb 2020	1,096.71	304.63
6	Mar 2020	1,141.36	320.80
7	Apr 2020	994.27	281.72
8	May 2020	840.62	207.55
9	Jun 2020	872.61	216.84
10	Jul 2020	613.76	157.14
11	Aug 2020	1,232.33	294.37
12	Sept 2020	2,610.76	658.60
13	Oct 2020	2,940.35	734.04
14	Nov 2020	2,620.16	650.20
15	Dec 2020	2,943.62	723.78
16	Jan 2021	2,209.89	588.53
17	Feb 2021	2,253.56	555.50
18	Mar 2021	2,529.98	634.57
19	Apr 2021	2,409.51	600.09
20	May 2021	1,945.58	520.73
21	Jun 2021	2,428.51	585.59
22	Jul 2021	2,460.58	648.28
23	Aug 2021	2,451,05	695.75
24	Sept 2021	2,303.58	615.80
25	Oct 2021	2,305.51	630.23
TOTAL		47,832.69	12,246.59

11. Summary of Actual Volume sold
Current License period (Dec 2020 – Oct 2021)

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	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	26,057.52	0	0	0	26,057.52
PK (MT)	6,717.81	0	0	0	6,717.81
Credits	0	0	0	0	0
Previous License period (Oct 2019 – Nov 2020)					
CPO (MT)	7,223.63	14,013.71	0	0	21,255.34
PK (MT)	5,435.09	0	0	0	5,435.09
Credits	0	0	0	0	0
Note: Conventional is RSPO certified material but sold as non-RSPO.					

11A. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any)				
No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
1	PT Rigunas Agri Utama – KCP Bungo Tebo	RSPO_PO1000005127	0	12,152.90
2	PT Sari Dumai Sejati	RSPO_PO1000006430	29,761.51	0
3	AAA Oils & Fats Pte Ltd	RSPO_PO1000001284	3,519.64	0
TOTAL			33,281.15	12,152.90

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 Sari Dumai Sejati	ISCC	14,013.71	0
TOTAL			14,013.71	0

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

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	Nil	Nil

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TOTAL	N/A
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12. Independent Smallholders Certified Tonnage / Volume									
Phase	Estimated (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			N/A			N/A			N/A
IS-CSPO	N/A	N/A		N/A	N/A		N/A	N/A	
IS-CSPKO	N/A	N/A		N/A	N/A		N/A	N/A	
IS-CSPKE	N/A	N/A		N/A	N/A		N/A	N/A	

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

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn. Bhd. (ASI Accreditation Number: ASI-ACC-067)
Suite 29.01 Level 29, The Gardens North Tower,
Mid Valley City, Lingkaran Syed Putra,
59200 Kuala Lumpur, Malaysia.
Tel +60 (3) 9212 9638 Fax +60 (3) 9212 9639
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 **26 October – 3 November 2021**. The audit programme is included as Section 2.3. Due to the COVID-19 pandemic, this assessment involved a partial remote audit as allowed by RSPO Secretariat – RSPO P&C On-site & Remote Audits dated 24th March 2020. The remote audit was conducted on **26 - 28 October 2020**. Where applicable, prior to the initial certification and recertification audit, 30 days Public Notification was made through the RSPO and BSI website on **14 September 2021**, the following link: <https://www.rspo.org/certification/public-announcement>

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

The Critical NC close out on-site assessment was conducted on **26 January 2022**. The audit programs are included in Section 2.3.

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

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

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

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each 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.

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

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

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

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

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Recertification)	Year 2 (ASA 1)	Year 3 (ASA 2)	Year 4 (ASA 4)	Year 5 (ASA 5)
Bungo Tebo Estate	X	X	X	X	X
Koperasi Tanjung Dani Sakti	X	X	X	X	X
Koperasi Sumay Jaya			X		
Koperasi Sumber Usaha		X			
Koperasi Sawit Bina Tani		X			
Koperasi Belarik Jaya			X		
Koperasi Sawit Tambara Jaya			X		
Koperasi Tunas Harapan			X		
Koperasi Sejahtera Tani				X	
Koperasi Produksi Tani Mandiri				X	
Koperasi Tanjung Jaya Bersama				X	
Koperasi Tanjung Aur Duri				X	
Koperasi Sawit Sumay Makmur		X			
Koperasi Sawit Makmur					X
Koperasi Barokah		X			
Koperasi Sawit Keluarga Sejahtera					X
Koperasi Sawit Makmur Bersama					X
Koperasi Sawit Karya Makmur					X
Koperasi Sawit Tanduk Perkasa				X	
Bungo Tebo Estate					X

Tentative Date of Next Visit: November 7, 2022 - November 18, 2022

Total Number of Mandays: 30 mandays

2.2 BSI Assessment Team

Name	Role	Competency
Mujinius Jalaraya (MJ)	Team Leader	<p>Education: Holds a Bachelor Degree majoring in Forest Resources Conservation and Ecotourism from Bogor Agricultural University (IPB).</p> <p>Work Experience: 6 years working experience in palm oil plantations as SHE Assistant at PT. Astra Agro Lestari Tbk and Sustainability Supervisor at Teladan Prima Group. 8 years working experience as RSPO Auditor / Lead Auditor.</p> <p>Training attended: Completed ISO 9001 Lead Auditor course, ISPO Lead Auditor course, RSPO endorsed RSPO P&C Lead Auditor course, RSPO endorsed RSPO SCCS Lead Auditor course, HCV Identification and management, ISO 14001 Internal Auditor Training, ISO 45001 Lead Auditor course, OHS Expert Training, SMETA Requirements Training</p> <p>Aspect covered in this audit: During this assessment, he assessed on the aspects of HCV management and monitoring, Environmental management and monitoring, OHS.</p> <p>Language proficiency: He is fluently speaking in English and Bahasa Indonesia.</p>
Edy Widodo (EW)	Team member	<p>Education: Holds a Bachelor Degree majoring Agricultural Technology from University of Padjadjaran, Bandung.</p> <p>Work Experience: 8 years working experience in palm oil industry as Agronomist and Assistant Manager in various companies. 9 year working experience as RSPO/ISPO auditor.</p> <p>Training attended: Completed ISO 9001: 2008 Lead Auditor Course, ISPO endorsed auditor course, Understanding ISO 14001: 2004 training, Auditing ISO 14001: 2004 training, RSPO Endorsed RSPO Supply Chain Certification Lead Auditor Course, RSPO Endorsed RSPO P&C Lead Auditor Course, SMETA Requirements Training, High Conservation Value (HCV) Training</p> <p>Aspect covered in this audit: During this assessment, he assessed on the aspects of transparency, company policy, social and labor.</p> <p>Language proficiency: He is fluent in English and Bahasa Indonesia.</p>
Nanang Rusmana (NR)	Team member	<p>Education: Holds a Bachelor Degree of Forestry from Bogor Agricultural University (IPB)</p> <p>Work Experience: 5 years working experience in palm oil industry as SHE Assistant at PT. Astra Agro Lestari Tbk. 3 years working experience in mining industry as Environment Coordinator and SHE Coordinator with PT. Kapuas Prima Coal Group. 6 years working experience as RSPO/ISPO auditor</p> <p>Training attended: Completed ISO 9001:2015 Lead Auditor Course, ISPO Auditor Course, ISO 14001:2015 Lead Auditor Course, ISO 45001:2018 Lead Auditor Course, RSPO endorsed RSPO P&C Lead Auditor Course, RSPO endorsed RSPO Supply Chain Certification Lead Auditor Course, SMK3 Auditor Course, HCV Assessor Course, General OHS Expert Course, SMETA Requirements training.</p> <p>Aspect covered in this audit: During this assessment he assessed on the aspects of Agronomy and mill best management practices, long term business plan, transparency, continual improvement.</p>

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<p>Pratama Agung Sedayu (PS)</p>	<p>Team member</p>	<p>Language proficiency: He is fluent in English and Bahasa Indonesia.</p> <p>Education: Holds a Bachelor Degree majoring Social Economic of Agriculture from University of Jenderal Soedirman.</p> <p>Work Experience: 12 years of practical auditing experience with several accredited Certification Bodies covering assessment against Organic programs, RSPO, FSC, Timber certification, ISO 9001 and ISO 14001. 2 years working experience as consultant on FSC and SVLK certification and independent verifier on BioCert, SDS under CAFÉ Practices program..</p> <p>Training attended: Completed the ISO 9001, ISO 14001, OHSAS 18001 Lead Auditor Course, HCV Identification and Management; ISPO Lead Auditor endorsed Course and Endorsed RSPO P&C Lead Auditor Course and Endorsed RSPO SCCS Lead Auditor Course.</p> <p>Aspect covered in this audit: During this assessment he assessed on the aspects of legal, supply chain and social.</p> <p>Language proficiency: He is fluent in English and Bahasa Indonesia.</p>
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Accompanying Persons

Name	Role
Nil	Nil

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2.3 Assessment Plan

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

Date	Time	Subjects	MJ	EW	NR	PS
Monday 25/10/2021	07.00 – 08.20	Flight Jakarta – Jambi	√	√	√	√
	09.00 – 16.00	Travel from Jakarta – Audit Location	√	√	√	√
Tuesday 26/10/2021	08.00 – 12.00	Opening Meeting Presentation by PT. RAU – Bungo Tebo POM, Estate and Smallholder Presentation by BSI Indonesia	√	√	√	√
		Field Visit to Bungo Tebo Estate: - Herbicide application programmes, harvesting, fertilizing operations, water management, road maintenance, terracing, HCV’s, riparian zones, etc. - Agrochemical stores, Fertilizer store, workshops, housing, landfill, clinic, riparian zones, Hazardous Waste, waste management, etc. - Boundaries inspection, worker interviews, social amenities, etc. Interview with: Labour Union and Gender Committee.	√	√	√	√
	12.00 – 14.00	Break	√	√	√	√
	14.00 – 17.00	Field Visit to Bungo Tebo POM: - Occupational Health and Safety, Environment Aspect. - Social Aspect and workers welfare, workers interview - Best Management Practice for Mill and supply chain for mill. - Field implementation for Operation Procedure. - Inspection of processing, warehouse, workshop, mill wastes management, Effluent Ponds, OHS, Environment issues, POME application, workers interview, Supply chain for CPO mill, Review on SEIA documents and records, Document review, etc.	√	√	√	√
Wednesday 27/10/2021	08.00 – 12.00	Field Visit to Scheme Smallholder: Koperasi Sumay Jaya Field visit to Kavling/Block member of Smallholder to verify conformity with RSPO INA NI 2020 Standard, BMP, OHS-EMS Implementation, HCV, Social and Labor, Continual improvement, etc. (12 sample)	√	√		
		Field Visit to Scheme Smallholder: Koperasi Sumber Usaha Field visit to Kavling/Block member of Smallholder to verify conformity with RSPO INA NI 2020 Standard, BMP, OHS-EMS Implementation, HCV, Social and Labor, Continual improvement, etc. (12 sample)			√	√
	12.00 – 14.00	Break	√	√	√	√

	14.00 – 17.00	Field Visit to Scheme Smallholder: Koperasi Sawit Tambara Jaya Field visit to Kavling/Block member of Smallholder to verify conformity with RSPO INA NI 2020 Standard, BMP, OHS-EMS Implementation, HCV, Social and Labor, Continual improvement, etc. (13 sample)	√	√	√	√
Thursday 28/10/2021	08.00 – 12.00	Field Visit to Scheme Smallholder: Koperasi Tanjung Aur Duri Field visit to Kavling/Block member of Smallholder to verify conformity with RSPO INA NI 2020 Standard, BMP, OHS-EMS Implementation, HCV, Social and Labor, Continual improvement, etc. (12 sample)	√	√		
		Field Visit to Scheme Smallholder: Koperasi Sawit Makmur Field visit to Kavling/Block member of Smallholder to verify conformity with RSPO INA NI 2020 Standard, BMP, OHS-EMS Implementation, HCV, Social and Labor, Continual improvement, etc. (12 sample)			√	√
	12.00 – 14.00	Break	√	√	√	√
	14.00 – 17.00	Field Visit to Scheme Smallholder: Koperasi Sawit Sumay Makmur Field visit to Kavling/Block member of Smallholder to verify conformity with RSPO INA NI 2020 Standard, BMP, OHS-EMS Implementation, HCV, Social and Labor, Continual improvement, etc. (13 sample)	√	√	√	√
Friday 29/10/2021	08.00 – 12.00	Field Visit to Scheme Smallholder: Koperasi Belarik Jaya Field visit to Kavling/Block member of Smallholder to verify conformity with RSPO INA NI 2020 Standard, BMP, OHS-EMS Implementation, HCV, Social and Labor, Continual improvement, etc. (12 sample)	√	√		
		Field Visit to Scheme Smallholder: Koperasi Tanjung Dani Sakti Field visit to Kavling/Block member of Smallholder to verify conformity with RSPO INA NI 2020 Standard, BMP, OHS-EMS Implementation, HCV, Social and Labor, Continual improvement, etc. (12 sample)			√	√
	12.00 – 14.00	Break	√	√	√	√
	14.00 – 17.00	Document Review Bungo Tebo POM & Estate: <ul style="list-style-type: none"> - Occupational Health and Safety, HCV, Environment Aspect, time bound plan. - Social Aspect and workers welfare, worker consultation, Stakeholder Consultation, impact assessments, policies. - Best Management Practice for Mill and supply chain for mill. 	√	√	√	√

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		- Operation Procedure, organization commitments, Legal compliance, continuous improvement, long term business plan. Audit Supply Chain for CPO Mills (RSPO SCCS)				
Saturday 30/10/2021	08.00 – 12.00	Continue Document Review for Bungo Tebo POM & Estate	√	√	√	√
	12.00 – 14.00	Break	√	√	√	√
	14.00 – 17.00	Continue Document Review for Bungo Tebo POM & Estate Document Review for Scheme Smallholder Cooperative (KUD) document review, management of smallholder, Group Manager, BMP, OHS-EMS Implementation, HCV, Social and Labor, Continual improvement, etc.	√	√	√	√
Sunday 31/10/2021		Holiday	√	√	√	√
Monday 01/11/2021	08.00 – 12.00	Document Review for Scheme Smallholder Cooperative (KUD) document review, management of smallholder, Group Manager, BMP, OHS-EMS Implementation, HCV, Social and Labor, Continual improvement, etc.	√		√	√
		Stakeholder consultation: Local government of Pelalawan Regency (DLH, Disbun, Dinsakertrans & BPN), Village head, surrounding community, NGO.		√		
	12.00 – 14.00	Break	√	√	√	√
	14.00 – 17.00	Document Review for Scheme Smallholder Cooperative (KUD) document review, management of smallholder, Group Manager, BMP, OHS-EMS Implementation, HCV, Social and Labor, Continual improvement, etc.	√	√	√	√
Tuesday 02/11/2021	08.00 – 12.00	Audit continue for Document Review	√	√	√	√
	12.00 – 14.00	Break	√	√	√	√
	14.00 – 17.00	Audit continue for Document Review	√	√	√	√
Wednesday 03/11/2021	08.00 – 12.00	Audit continue for Document Review	√	√	√	√
	12.00 – 14.00	Break	√	√	√	√
	14.00 – 15.00	Report Preparation	√	√	√	√
	15.00 – 17.00	Closing Meeting	√	√	√	√

NCR Closure Assessment Plan

Date	Time	Subjects	MJ
Wednesday 26/01/2022	13.00 – 13.30	Opening meeting	√
	13.30 – 17.00	NCR Follow up Verification	√
	17.00 – 17.30	Closing Meeting	√

Section 3: Assessment Findings

3.1 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?	PT Inti Indosawit Subur has explained the certification plan for all of its subsidiaries; indicating all palm oil mills, company-owned estates and scheme smallholder as the supply base.	Complied.
Have all the estates and mills certified within five (5) years after obtaining RSPO membership?	<p>There is remaining mill and estate that has not certified as below:</p> <ol style="list-style-type: none"> 1. PT Mitra Unggul Pusaka - Segati Palm Oil and its supply bases: Segati Estate & Gondai Estate; Penarikan Palm Oil Mill and its supply bases: Penarikan Estate located in Pelalawan, Riau. PT Mitra Unggul Pusaka – Segati Mill and Penarikan Mill and its supply bases. The unit has gone through the RSPO Stage 2 certification audit in 2014, however it was not succeed because there are plantings carried out after November 2005 and 2010 which must go through the NPP and RaCP processes completed prior to certification. The company’s sustainability team has conducted latest RSPO internal audit on December 2020. PT Mitra Unggul Pusaka will planned Re-Audit after RaCP process completed and concept note approved by RSPO, estimated in year 2022. Status of disclosure and NPP PT MUP has been submitted to RSPO by email since 29 November 2017. The latest email correspondences from RSPO dated 3 December 2020 confirmed that the concept note draft has been submitted by PT MUP, concept note were still under review by RSPO and there was a comments from RSPO to be followed up by company to improved for resubmission on clarity and precision of the content. PT MUP has reply the email by 6 May 2021 to RSPO for submission the revise of Concept Note and response for RSPO Comment; also attach the supporting document as part of Concept Note. 2. Bahilang Estate (PT Nusa Pusaka Kencana/NPK). RaCP still under Process. Certification audit will be planed on 2022. According to email correspondence with RSPO and PT NPK Bahilang Estate dated 26 July 2021, LUCA has been sent by company and acknowledge document receipt by RSPO, LUCA has been placed in the queue. 3. Sentral Estate (PT Gunung Melayu). RaCP still under Process. Certification audit will be planned 	Complied

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	<p>on 2022. LUCA submission has been sent on 28 Dec 2020, latest update from RSPO email dated 18 March 2021 to company, LUCA still under review and report needs clarification and still follow up by company.</p> <p>4. Teluk Panji Estate. HGU for this unit has not been obtained and still under process. Certification audit will be planned on 2022. Latest updated July 2021, HGU still under process in Badan Pertanahan Nasional.</p>	
<p>Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available.</p>	<p>No, there is no new acquisition conducted by PT Inti Indosawit Subur and its subsidiary.</p>	<p>Complied</p>
<p>Any deviations from the maximum periods requires approval by the RSPO Secretariat.</p>	<p>There is no deviation of timeboundplan. However there is a revision of timeboundplan due to RaCP process and HGU process still on going.</p>	<p>Complied</p>
<p>Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required.</p> <p>Is this consistent with the ACOP reporting?</p>	<p>Yes, there is time bound plan revision dated 1 July 2021, signed by Management Representative. Justification available:</p> <ol style="list-style-type: none"> 1. PT Mitra Unggul Pusaka - Segati Palm Oil and its supply bases: Segati Estate & Gondai Estate; Penarikan Palm Oil Mill and its supply bases: Penarikan Estate located in Pelalawan, Riau. RaCP still under process of concept note review by RSPO. Certification audit will be planned on 2022 2. Bahilang Estate (PT). RaCP still under Process. Certification audit will be planned on 2022. 3. Sentral Estate (PT Gunung Melayu). RaCP still under Process. Certification audit will be planned on 2022. 4. Teluk Panji Estate. HGU has not been obtained and still under process on government side. Certification audit will be planned on 2022. 	<p>Complied</p>
<p>Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised</p>	<p>There is no any isolated lapses in implementation of the plan. There are the changing on the plan due to the process of RaCP for PT Mitra Unggul Pusaka, Bahilang Estate and Sentral Estate and HGU issuance process for Teluk Panji 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 to proceed with implementation of the plan. Company has taken action to proceed all uncertified unit to complete the RaCP and to obtained the HGU for Teluk Panji Estate.</p>	<p>Complied</p>
<p>Un-Certified Units or Holdings</p>		

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<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>According to Land Use change analysis, there are several area conversion from rubber plantation to become palm oil plantation in PT Mitra Unggul Pusaka, cacao plantation in Bahilang Estate and Sentral Estate, no primary forest.</p> <p>Latest progress of RaCP PT Mitra Unggul Pusaka based on email correspondence between company and RSPO dated 3 December 2020, confirmed that RSPO has review the concept note and there is a comment to be improved and company has give the feedback and revision of Concept Note on 6 May 2021 and waiting for the review from RSPO secretariat.</p> <p>Bahilang Estate (PT Nusa Pusaka Kencana/NPK). RaCP still under Process. Certification audit will be planned on 2022. According to email correspondence with RSPO and PT NPK Bahilang Estate dated 26 July 2021, LUCA has been sent by company and acknowledge document receipt by RSPO, LUCA has been placed in the queue.</p> <p>Sentral Estate (PT Gunung Melayu). RaCP still under Process. Certification audit will be planned on 2022. LUCA submission has been sent on 28 Dec 2020, latest update from RSPO email dated 18 March 2021 to company, LUCA still under review and report needs clarification and still follow up by company.</p> <p>Teluk Panji Estate. HGU for this unit has not been obtained and still under process. Certification audit will be planned on 2022. Latest updated July 2021, HGU still under process in Badan Pertanahan Nasional.</p>	<p>Complied</p>
<p>Any new plantings since January 1st 2010 shall comply with the RSPO New Plantings Procedure.</p>	<p>PT Mitra Unggul Pusaka – Segati Mill, PT NPK Bahilang Estate and Sentral Estate RaCP and relevant issues are still in progress and waiting for RSPO feedback. According to Land Use change analysis, there are several area conversion from rubber plantation to become palm oil plantation in PT Mitra Unggul Pusaka, cocoa plantation in Bahilang Estate and Sentral Estate no primary forest.</p> <p>Latest progress of RaCP PT Mitra Unggul Pusaka based on email correspondence between company and RSPO dated 3 December 2020, confirmed that RSPO has review the concept note and there is a comment to be improved and company has give the feedback and revision of Concept Note on 6 May 2021 and waiting for the review from RSPO secretariat.</p>	<p>Complied</p>

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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.	According to internal audit result on December 2020, there is no land conflict occur in PT Mitra Unggul Pusaka – Segati Mill.	Complied
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	According to internal audit result on December 2020, there is no Labor disputes occur in PT Mitra Unggul Pusaka – Segati Mill.	Complied
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	According to internal audit result on December 2020, there is no legal noncompliance occur in PT Mitra Unggul Pusaka – Segati Mill.	Complied
Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.	PT Mitra Unggul Pusaka – Segati Mill conduct the internal audit each year. Latest internal audit on December 2021. Report of internal audit are available. Internal audit covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12. Positive assurance by Internal Audit Dept. statement are available: There is no land conflict occur between surrounding community, no labor disputes occur, no legal noncompliance, HCV monitoring and management well implemented.	Complied
Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?	According to internal audit report for uncertified unit, there is no Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12. Report of internal audit can be shown during audit.	Complied
Have there been any stakeholder (including NGO) consultation conducted?	During internal audit December 2021, the stakeholder consultation including NGO cannot be done due to Pandemic Covid-19 circumstances. The stakeholder consultation will be conducted after the normal situation.	Complied

3.2 Progress of scheme smallholders and/or outgrowers

Progress of scheme smallholders or outgrowers towards compliance with relevant standards		
Requirement	Remarks	Compliance
Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification? OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years.	Smallholder as a supply base of PT Inti Indosawit Subur (Asian Agri Group) as a parent company of PT Rigunas Agri Utama has been certified comply with the standard within three years of the mill's initial certification as bellow: Buatan Plasma Certified on 13 th March 2012 as supply base of Buatan I & II Mill which Certified on 16 th September 2010.	Complied

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	<p>Buatan KKPA Certified on 17th January 2013 as supply base of Buatan I & II Mill which Certified on 16th September 2010.</p> <p>Ukui Plasma Certified on 11th June 2012 as supply base of Ukui I & II Mill which Certified on 1st March 2011.</p> <p>Tungkal Ulu Plasma Certified on 11th July 2013 as supply base of Tungkal Ulu Mill which Certified on 15th August 2012.</p> <p>Muara Bulian Plasma & KKPA Certified on 12th July 2013 as supply base of Muara Bulian Mill which Certified on 28th August 2012.</p> <p>Bungo Tebo Plasma Certified on 7th February 2017 as supply base of Bungo Tebo Mill which Certified on 3rd December 2015.</p>	
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Approved Time Bound Plan

Name of Mill	Mill Address	Name of Supply Base Plantation	Estate Address	Time bound for certification	Status
Buatan I Mill	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau	Buatan Estate	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau		Certified on 16 September 2010 Re-Certified on 16 September 2015 Re-Certified 2 on 24 August 2021
		Buatan (Plasma)			
Buatan II Mill	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau	Simpang Perak Estate	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau		Certified on 16 September 2010 Re-Certified on 16 September 2015 Re-Certified 2 on 12 August 2021
		Buatan (Plasma)			
Ukui I Mill	Ukui Village, Ukui District, Pelalawan Regency, Riau	Ukui Estate	Ukui Village, Ukui District, Pelalawan Regency, Riau		Certified on 1 March 2011 Re- Certified on 1 March 2016 Re-Certified 2 30 August 2021
		Ukui (Plasma)			
Ukui II Mill	Ukui Village, Ukui District, Pelalawan Regency, Riau	Soga & Sei Lala Estate	Ukui Village, Ukui District, Pelalawan Regency, Riau		Certified on 1 March 2011 Re-Certified on 1 March 2016 Re-Certified 2 25 August 2021
		Ukui (Plasma)			
Tungkal Ulu Mill	Pulau Pauh / Penyabungan/ Merlung Village, Tungkal Ulu District, Tanjung Jabung Regency, Jambi	Tungkal Ulu Estate	Pulau Pauh / Penyabungan/ Merlung Village, Tungkal Ulu District, Tanjung Jabung Regency, Jambi		Certified on 15 August 2012 Re-Certified on 15 August 2017
		Tungkal Ulu (Plasma)			
Muara Bulian Mill	Singoan / Bukit Sari / Bulian Jaya Village, Muara Bulian / Pelayung District, Batanghari Regency, Jambi	Muara Bulian Estate	Singoan / Bukit Sari / Bulian Jaya Village, Muara Bulian / Pelayung District, Batanghari Regency, Jambi		Certified on 28 August 2012 Re- Certified on 28 August 2017
		Muara Bulian (Plasma)			
Topaz Mill	Petapahan Village, Tapung District, Kampar Regency, Riau	Topaz Estate	Petapahan Village, Tapung District, Kampar Regency, Riau		Certified on 30 March 2015 Re-Certified 30 March 2020
Taman Raja Mill	Lubuk Bernai / Kampung Baru / Pelabuhan Dagang / Pematang Pauh Vilage, Tungkal Ulu District, Tanjung Jabung Regency, Jambi	Taman Raja, Badang & Bernai Estate*	Lubuk Bernai / Kampung Baru / Pelabuhan Dagang / Pematang Pauh Vilage, Tungkal Ulu District, Tanjung Jabung Regency, Jambi		Certified on 20 February 2015 Re-Certified 20 February 2020 <i>*Bernai Estate Split From Taman Raja & Badang Estate Since</i>

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					<i>1 January 2019</i>
Segati Mill	Langgam / Penarikan / Tambak / Sotol Village, Langgam District, Pelalawan Regency, Riau	Segati Estate	Langkan / Penarikan / Tambak / Sotol Village, Langgam District, Pelalawan Regency, Riau	2022	Main Assessment audit on 29 Nov – 4 December 2021
		Gondai Estate	Pangkalan Sarik / Baru Village, Langgam / Siak Hulu District, Pelalawan / Kampar Regency, Riau	2022	Main Assessment audit on 29 Nov – 4 December 2021
Penarikan Mill	Penarikan Village, Langgam District, Pelalawan Regency, Riau	Penarikan Estate*	Penarikan / Tambak Village, Langgam District, Pelalawan Regency, Riau	2022	Main Assessment audit on 29 Nov – 4 December 2021
Tanah Datar Mill	Tanah Datar Petatal Village, Talawi District, Asahan Regency, North Sumatera	Tanah Datar Estate	Tanah Datar Petatal Village, Talawi District, Asahan Regency, North Sumatera		Certified on 18 May 2015 Re-Certified 18 May 2021
		Bahilang Estate	Bahilang Village, Tebing Tinggi District, Serdang Bedagai Regency, North Sumatera	2022	*Bahilang Estate On Process RaCP (Recertification 2020)
Aek Nabara Mill	S1-S3 / Sukadame Village, Bilah Hulu / Kota Pinang District, Labuhan Batu Regency, North Sumatera	Aek Nabara Estate	S1-S3 / Sukadame Village, Bilah Hulu / Kota Pinang District, Labuhan Batu Regency, North Sumatera		Certified on 6 March 2015 Re-Certified 6 March 2020
Teluk Panjie Mill	Teluk Panjie Village, Kampung Rakyat District, Labuhan Batu Regency, North Sumatera	Teluk Panjie Estate (3,885 Ha)	Teluk Panjie Village, Kampung Rakyat District, Labuhan Batu Regency, North Sumatera		Certified on 21 April 2015 Re-Certified 21 April 2020
		Teluk Panjie Estate (801 Ha)		2022	HGU is still in Process
Peranap Mill	Simelinyang / Pauh Ranap / Sengkilo Village, Peranap District, Indragiri Hulu Regency, Riau	Peranap Estate	Simelinyang / Pauh Ranap / Sengkilo Village, Peranap District, Indragiri Hulu Regency, Riau		Certified on 7 January 2015 Re-Certified 7 January 2020
		Peranap (Plasma)			Certified on 18 August 2016 Re-Certified 7 January 2020
Bungo Tebo Mill	Tuo Sumai / Sungai Rambai Village, PWK Sumai / Tebo Ulu District, Bungo Tebo Regency, Jambi	Bungo Tebo Estate	Tuo Sumai / Sungai Rambai Village, PWK Sumai / Tebo Ulu District, Bungo Tebo Regency, Jambi		Certified on 3 December 2015 Re-Certified On Process – Recertification audit on October 2021
		Bungo Tebo (Plasma)			Certified on 7 February 2017
Tanjung Selamat Mill	Kampung Padang Village, Bilah Hilir District, Labuhan	Tanjung Selamat	Kampung Padang Village, Bilah Hilir District, Labuhan Batu Regency,		Certified on 26 May 2015

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	Batu Regency, North Sumatra		North Sumatra		Re-Certified 24 August 2021
		Pangkalan	Sennah Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra		Certified on 26 May 2015 Re-Certified 24 August 2021
Gunung Melayu I	Rahuning Village, Bandar Pulau District, Asahan Regency, North Sumatra	Pulau Maria Estate	Rahuning Village, Bandar Pulau District, Asahan Regency, North Sumatra		Certified on 7 September 2015 Re-Certified 21 March 2022
Gunung Melayu II	Gonting Mahala Village, Bandar Pulau District, Asahan Regency, North Sumatra	Aek Tarum & Batu Anam Estate	Gonting Mahala Village, Bandar Pulau District, Asahan Regency, North Sumatra		Certified on 8 July 2015 Re-Certified 23 January 2022
		Sentral estate		2022	Sentral Estate on RaCP process
Negri Lama II	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	Negri Lama	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra		Certified on 23 December 2016 as Independent Mill Re-Certified 14 September 2021 Audit in 2016 as Mill and Supply Base
		Aek Kuo (2,088 ha)		Aek Korsik Village, Aek Natas District, Labuhan Batu Regency, North Sumatra	
		Aek Kuo (501 ha)			HGU Complete Audit at ASA 3 (2018)
Negri Lama I	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	*3 rd party which is excluded from scope of certification	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra		Certified on 8 April 2015 Re-Certified 14 September 2021 Audit in 2016 as Independent Mill

Note: update February 2022

3.3 Details of Nonconformities

The nonconformities are listed below. The findings summary of the assessment by criteria are listed in Appendix A. During this Assessment there were one (1) Critical; Five (5) Minor nonconformities and one (1) Opportunity For Improvement raised. The PT Rigunas Agri Utama – Bungo Tebo POM Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

Non-conformity			
NCR Ref #	2127485-202110-M1	Date Issued	03/11/2021
Due Date	03/02/2022	Date of nonconformity Closure	26/01/2022
Clause & Category (Critical / Minor)	6.7.3 Critical		
Statement of Nonconformity:	It was found that driver (workers) from plasma and outgrower including kernel transport were not using appropriate PPE entering the Bungo Tebo POM which is mandatory area for using PPE (safety shoes & helmet).		
Requirement Reference:	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.		
Objective Evidence:	During field visit to Bungo Tebo Palm oil Mill, it was found that driver from plasma (scheme smallholder) and outgrower including kernel transport were not using shoes but instead using slipper when driving FFB transport and perform weighing in Bungo Tebo POM.		
Corrections:	<ul style="list-style-type: none"> Order security to check the completeness of the PPE for the Plasma FFB driver, External FFB and Kernel driver who will enter the Mill area. Provide PPE shoes at the entrance / security post and lend them to FFB Plasma truck drivers, External FFB and Kernel Truck Drivers who do not carry PPE when entering the Mill area. 		
Root Cause Analysis:	Lack of awareness from the drivers of plasma FFB, External FFB and Kernel transport drivers about the importance of using PPE for occupational safety and health as well as the lack of monitoring and supervision from the company.		
Corrective Actions:	<ul style="list-style-type: none"> Provide understanding or awareness to all Plasma FFB transport drivers, External FFB and Kernal transportation drivers about the importance of using PPE. Make a joint commitment with the plasma FFB transportation driver and Kernel transportation driver to always use PPE when entering the Mill area. Monitoring the PPE usage by driver who entering the mill area. 		
Assessment Conclusion:	<ul style="list-style-type: none"> The company has conducted briefings and awareness to all external FFB transporting drivers and kernel/CPO drivers about the importance of using PPE 		

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	<p>(shoes and helmets) when entering the Mill area. The company also conveyed the potential risks in the Mill and the truck driver's obligation to use PPE when entering the Mill. Briefing and awareness are conducted on 20 December 2021. Evidence of awareness can be demonstrated during NCR Close out. Interview with sampled driver confirmed that they have aware regarding their obligation to use PPE (shoes and helmet) during entering the mill area.</p> <ul style="list-style-type: none"> • All driver FFB has make a joint commitment or statement letter to always use PPE when entering the Mill area, the commitment are written in "Surat Pernyataan" dated 20 December 2021, signed by all driver. According to statement letter stated that all drivers FFB, kernel and CPO transport will comply with all company OHS rules and will use PPE helmets and shoes when entering the Mill area. • Bungo Tebo mill has provide PPE (shoes and helmet) at the entrance/security post and lend them to the drivers who do not carry PPE when entering the Mill area. • Bungo Tebo Mill Security has also checked the completeness of PPE for drivers who will enter the Mill area and record the results of the inspection in the "Pemeriksaan Penggunaan APD" document. <p>Based on above evidence, the NC Closed on 26/01/2022.</p>
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Non-conformity			
NCR Ref #	2127485-202110-N1	Date Issued	03/11/2021
Due Date	Next Assessment	Date of nonconformity Closure	-
Clause & Category (Critical / Minor)	3.3.3 Minor		
Statement of Nonconformity:	It was found that Best Management Practices of palm oil plantation has not consistently implemented in several smallholder block according to procedure, no monitoring and action taken to address the issue regarding Best Management Practices implementation.		
Requirement Reference:	Records of monitoring and any actions taken are maintained and available		
Objective Evidence:	<p>Based on field visit to smallholder member of Plasma Rigunas Agri Utama, it was found there are still lots of smallholder member plots that are not well maintained according to Best Management Practices procedures. Sample seen:</p> <ul style="list-style-type: none"> - KUD Sawit Sumay Makmur, member No.421 Yitno-Riyanto, No.425 Misdja-Kiki; KUD Tanjung Dani Sakti, member No.672 Anwar-Samhudi weeds condition uncontrol in their plots. - KUD Tanjung Dani Sakti, member No. 648 F Sianipar, No. 675 Sawal Pasaribu, weeds condition uncontrol in their plots - KUD Sumay Makmur, member No. 724 Komarudin, weeds condition are uncontrol - KUD Sawit Sumay Makmur KT 07, member No 430, Pak Jurianto: weeds condition are uncontrol 		
Corrections:	<ul style="list-style-type: none"> • Provide direction to smallholder members to continue to maintain plots, especially for harvest access such as circle and path weeding control. 		

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	<ul style="list-style-type: none"> Assisting KUD / Farmers in managing PSR to get BDPKS funds so that replanting can be realized immediately.
Root Cause Analysis:	Due to the plots of farmers who participated in the replanting program, the farmers no longer took care of the plots.
Corrective Actions:	Regular monitoring plot inspections carried out by plasma supervisors.
Assessment Conclusion:	To be verified in the next surveillance.

Non-conformity			
NCR Ref #	2127485-202110-N2	Date Issued	03/11/2021
Due Date	Next Assessment	Date of nonconformity Closure	-
Clause & Category (Critical / Minor)	7.2.5 Minor		
Statement of Nonconformity:	During field visit it was found the paraquat usage by smallholder member without due diligence process, or when authorised by government authorities for pest outbreaks.		
Requirement Reference:	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.		
Objective Evidence:	<ul style="list-style-type: none"> Based on field visit to smallholder KUD Sawit Sumay Makmur, in area block No.426 Sumanto-Ginting/Bunyamin and No.420 Ruslan-Margito, audit team found freshly used Noxone (a.i. Paraquat) and Metsulindo (a.i. Methyl Metsulfuron). Based on field visit to KUD Sumay Makmur, KT 34 kavling No. 719 Ngadri confirmed that weeds control in his plots was handle by himself using Gramoxone. Based on field visit to KUD Sawit Tambara Jaya KT 46, Kav. 2272 Sahori, confirmed that weeds control in his plots was handle by himself and found the ex Noxone (paraquat) usage in the field. 		
Corrections:	Looking for an alternative to paraquat with the active ingredients of glyphosate and floroxyfir/triclofir		
Root Cause Analysis:	Some farmers are not satisfied with the results of the TUS team's spray because the weeds that are sprayed don't die quickly		
Corrective Actions:	<ul style="list-style-type: none"> Conducting socialization on the dangers of using paraquat in plasma farmer plots. Make monitoring of plot inspections carried out by plasma supervisor. 		
Assessment Conclusion:	To be verified in the next surveillance.		

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Non-conformity			
NCR Ref #	2127485-202110-N3	Date Issued	03/11/2021
Due Date	Next Assessment	Date of nonconformity Closure	-
Clause & Category (Critical / Minor)	6.2.7 Minor		
Statement of Nonconformity:	It was found that the company still employs non-permanent workers (PHL) for the main work (Core Work) in harvesting activities and mill processing.		
Requirement Reference:	Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.		
Objective Evidence:	<ul style="list-style-type: none"> - According to list of employee September 2021 there was 41 non permanent workers (PHL) working as harvester and 19 non permanent workers (PHL) working as mill processing workers. The non permanent workers has been employ since 2012 - 2021. - There was a promotion of non permanent employee in 2021 for 11 non permanent workers in to permanent workers (SKU), however only 1 harvester (PHL) have been promote and the rest of 41 harvester status until October 2021 remain non permanent workers (PHL). 		
Corrections:	<ul style="list-style-type: none"> • Re-identify harvesting and processing PHL workers and make selections to be proposed for appointment as permanent workers. • Monitor PHL workers, especially for harvesting and processing work 		
Root Cause Analysis:	<ul style="list-style-type: none"> • High turnover of harvest and process workers, so some harvest and process workers have only worked for a few months. • The analysis and monitoring of PHL workers has not been carried out in accordance with the ratio of labor needs, especially for harvesting. 		
Corrective Actions:	Coordinate with HRD RO3 to make a program for the appointment of PHL workers, especially for harvesting and processing work within the next 5 years		
Assessment Conclusion:	To be verified in the next surveillance.		

Non-conformity			
NCR Ref #	1976739-202010-N1	Date Issued	28/10/2020
Due Date	Next Assessment	Date of nonconformity Closure	03/11/2021
Clause & Category (Critical / Minor)	1.2.1 Minor		
Statement of Nonconformity:	Some cooperation agreement documents i.e hazardous waste management and CPO and CPKO agreement do not explain about business ethics in accordance with RSPO P&C requirements.		
Requirement Reference:	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.		

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Objective Evidence:	<p>Based on review to these contract, there is no specific article that describes the business ethics policy.</p> <ul style="list-style-type: none"> - Hazardous and Toxic Waste (LB3) Management Cooperation Agreement between Asian Agri Group Jambi and PT Shali Riau Lestari and PT Wastec International No. 118/SPK/AAG.JMB-SRL.WI/IV/2015 dated 18 April 2015. - Hazardous and Toxic Waste (LB3) Management Cooperation Agreement between PT Rigunas Agri Utama – Bungo Tebo and PT Shali Riau Lestari No. 034/SRL-PKU/MOU/IV/2020 dated 1 April 2020. - Agreement of CPO and CPKO transportation between PT Rigunas Agri Utama and CV Teman Setia contract no. 01/X/TS-RAU/2019 and CV Jaya Pertama contract no. 01/VI/JP-RAU/ 2020.
Corrections:	<ol style="list-style-type: none"> 1. Identify PICs that make cooperation contracts with third parties (hazardous and toxic waste management and CPO & CPKO transporters). 2. The sustainability team conducted dissemination via email to the PIC who issued the cooperation contract with the party (hazardous and toxic waste management and CPO & CPKO transporters) regarding the requirements of RSPO P&C which require a clause containing a business code of conduct.
Root Cause Analysis:	<ol style="list-style-type: none"> 1. There is no dissemination yet for PICs who issued cooperation contracts with third parties (hazardous and toxic waste management and CPO & CPKO transporters) regarding the requirements of the code of conduct clause according to the RSPO P&C. 2. The absence of a cooperation contract format with third parties which contains a code of conduct clause according to the RSPO P&C requirements.
Corrective Actions:	<ol style="list-style-type: none"> 1. Identify contracts with third parties used in the operation of plantations and their processors, whether local contracts that issued by the operation unit or contracts made by the Regional Office / Group. 2. Identify the PIC that makes contracts with third parties, and disseminate to them the requirements of the RSPO Principles and Criteria that require a clause containing a code of business conduct. 3. Communicate with the PIC which makes contracts with third parties used in the operation, regarding the contract format by adding a code of business conduct.
Assessment Conclusion:	<p>PT. Rigunas Agri Utama demonstrated rectification in the contract for hazardous waste (LB3) management between Asian Agri Group Jambi and PT. Shali Riau Lestari and PT. Wastec International No. 18/SPK/AAG.JMB-SRL-WI/II/2021 dated 15 February 2021.</p> <ul style="list-style-type: none"> - Chapter 3 verse 4 stated all parties shall perform ethical conduct in implementation of the agreement. - Chapter 9 stipulates prohibit all kinds of manipulation, conspiracy, fraudulent behaviour, embezzlement, bribery (in form of financial, gift, hospitality, etc.) to put employee in due influence related to financial benefit or other benefit. <p>PT. Rigunas Agri Utama demonstrated rectification in the contract for CPO and CPKO transport between PT. Rigunas Agri Utama and CV Teman Setia No.01/X/TS-RAU/2020 dated 1 December 2020.</p> <ul style="list-style-type: none"> - Chapter 7 Verse 3 stated all parties shall perform ethical conduct in implementation of the agreement.

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	<p>PT. Rigunas Agri Utama demonstrated rectification in the contract for CPO and CPKO transport between PT. Rigunas Agri Utama and CV Jaya Pertama No.01-a/VI/TS-RAU/2020 dated 1 December 2020.</p> <ul style="list-style-type: none"> - Chapter 7 Verse 3 stated all parties shall perform ethical conduct in implementation of the agreement.
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Non-conformity			
NCR Ref #	1976739-202010-N2	Date Issued	28/10/2020
Due Date	Next Assessment	Date of nonconformity Closure	03/11/2021
Clause & Category (Critical / Minor)	6.7.2 Minor		
Statement of Nonconformity:	Assigned operatives trained in first aid are not present in both field and other operations.		
Requirement Reference:	Accident and emergency procedures in Indonesian language are in place and clearly understood by all workers. Assigned operatives trained in first aid are present in both field and other operations. First aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.		
Objective Evidence:	<p>Licensed first aider on behalf Fadli, Amd. Kep. has been resigned from PT Rigunas Agri Utama, until the remote audit carried out there was no replacement of first aider.</p> <p>No evidence that trained person in first aid has been assigned by company in both field and other operations.</p>		
Corrections:	Communicate with HRD RO Jambi and Buatan Training Center to schedule first aid training for the new first aid officers.		
Root Cause Analysis:	There has been no training for first aid officers being held by external parties because of COVID-19 pandemic, so that the unit has not been able to register medical personnel for training.		
Corrective Actions:	Ensure that every P3K (first aid) officer who will be on duty has received training by an External Training Provider according to the available training schedule.		
Assessment Conclusion:	<p>Communicate with HRD RO Jambi and Buatan Training Center to schedule first aid training for the new first aid officers.</p> <p>Company has Assigned operatives trained in first aider on behalf Yongki Arif Pratipta and Ratna Sari. Both first aider has been trained by Dinas Tenaga Kerja dan Transmigrasi Provinsi Jambi on 14 – 15 October 2021.</p> <p>Certificate and licence of First aider has been obtained:</p> <ul style="list-style-type: none"> - Certificate number No. Ser: UPTD/Nakertrans/3.1.2/X/2021, dated 16 October 2021, on behalf Yongki Arif Pratipta issued by Dinas Tenaga Kerja dan Transmigrasi Provinsi Jambi. Licence Reg. No. Ser/UPTDI/Nakertrans/3.1.2/2021 dated 16 October 2021 valid until 16 October 2024. - Certificate number No. Ser: UPTD/Nakertrans/3.1.2/X/2021, dated 16 October 2021, on behalf Ratna Sari issued by Dinas Tenaga Kerja dan Transmigrasi 		

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	Provinsi Jambi. Licence Reg. No. Ser/UPTDI/Nakertrans/3.1.2/2021 dated 16 October 2021 valid until 16 October 2024.
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Opportunity for Improvements	
OFI #	Description
OFI 1	PT. Rigunas Agri Utama – Bungo Tebo POM has progress the information of the indirect FFB supplier to Bungo Tebo POM. Certificate holder has to complete the information regarding geolocation of FFB origins, proof of ownership status, and if relevant valid planting/operational/trading license to allows buying and selling of FFB.

Positive Findings	
PF #	Description
PF 1	Company has made the continual improvement of best management practise both in Mill and Estate.

3.3.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	1839713-201910-M1	Date Issued	25 October 2019
Due Date	22 January 2020	Date of nonconformity Closure	13 November 2019
Clause & Category (Critical / Minor)	RSPO P&C INA NI, September 2016 - Indicator 2.2.2 minor Escalated to Major		
Statement of Nonconformity:	Legal boundary pegs in sample of smallholders plot are not found.		
Requirement Reference:	Legal boundaries are demonstrated clearly and maintained.		
Objective Evidence:	During field visit at smallholder kavling, it was found: <ul style="list-style-type: none"> - Kavling 1369 KUD Sawit Tanduk Perkasa: 1 boundary pegs were not available. There is no follow up action. - Kavling 1362 KUD Sawit Tanduk Perkasa: 1 boundary pegs were not available. According to monitoring result on 31/07/2019 1 boundary pegs were not available. There is no follow up action. - Kavling 407 KUD Sumay Makmur: 1 boundary pegs were not available. Monitoring result on 07/01/2019 were not follow up. - Kavling 475 KUD Barokah: 1 boundary pegs were not available. 		
Corrections:	<ul style="list-style-type: none"> • Installing smallholders plot missing pegs at Kavling 1362 and 1369 KUD Sawit Tanduk Perkasa, Kavling 407 KUD Sumay Makmur and Kavling 475 KUD Barokah. • Plasma Bungo Tebo has taken action to install the boundary pegs at Kavling 407 KUD Sawit Sumay Makmur, Kavling 475 KUD Barokah, Kavling 1362 and 1369 KUD Sawit Tanduk Perkasa at 28 October 2019. Evidence of boundary 		

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	<p>pegs installation are available as per "Berita Acara Pemasangan Patok Batas di Kavling Petani".</p> <ul style="list-style-type: none"> • Plasma Bungo Tebo also has taken follow up action by conducting socialization and awareness regarding the benefit of boundary markers (pegs) installation in their kavling. Boundary markers function are: to determined the size area of kavling ownership, to assist the boundary of harvesting area, weeds control, fertilizer application and pruning. Socialization conductd on 29 October 2019 at KUD Office KUD Sawit Tanduk Perkasa Desa Sako Makmur. Socialization participant are from KUD Sawit Tanduk Perkasa, KUD Sumay Makmur and KUD Barokah, attend by 48 participant including official of KUD. Evidence of awareness and socialization are available such as attendant list, minutes of socialization and photo documentation. • Plasma Bungo Tebo also install the banner/baliho as media for socialization in KUD Barokah, KUD Sawit Tanduk Perkasa, KUD Sawit Sumay makmur, KUD Sawit Keluarga Sejahtera, KUD Sawit Makmur Bersama. The evidence of banner installation as per "Berita Acara Pemasangan Baliho Patok Batas di Kavling Petani" dated 9 November 2019.
<p>Root Cause Analysis:</p>	<ul style="list-style-type: none"> • Lack of awareness from smallholder member because they deemed the existing boundary (palm frond) was sufficient. • There is no program of boundary pegs instalation
<p>Corrective Actions:</p>	<ul style="list-style-type: none"> • Socialization and awareness program to smallholder member regarding the boundary markers function and best management practices of agronomy. • Develop the program of monitoring smallholder plantation block/kavling condition to ensure the kavling of smallholder were follow the rules and standard of procedure including the boundary markers.
<p>Assessment Conclusion:</p>	<ul style="list-style-type: none"> • Plasma Bungo Tebo has made the socialization and awareness program to smallholder member regarding the boundary markers function and best management practices of agronomy as per "Jadwal Sosialisasi Pemasangan Patok Batas Kapling Kebun Plasma KLO 2019 – 2020". Program is applicable at all KUD. • Program of monitoring smallholder plantation block/kavling condition also has been made by Plasma Bungo Tebo each month. The monitoring result also review by Plasma Bungo Tebo through monthly management review (Estate Monthly Meeting). Latest management review conducted on 31 October 2019, to review the inspection/monitoring result of January - July 2019. Minutes of management review are available, follow up action of management review can be demonstrated. • In addition, Plasma Bungo Tebo management has issued the Memorandum No. 020/RAU/KLO/MEMO/10/19 dated 28 October 2019. Memorandum is concerning Role and Responsibility "Rencana Jangka Panjang Pemasangan Patok kavling".. Legal boundary pegs smallholders plot are found accordingly and there are the regular monitoring has done to ensure the boundary pegs are maintain and available. <p>Audit Team conclude that Major Non-Conformity is remain closed.</p>

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Non-conformity			
NCR Ref #	1839713-201910-M2	Date Issued	25 October 2019
Due Date	22 January 2020	Date of nonconformity Closure	13 November 2019
Clause & Category (Critical / Minor)	General Chain of Custody Requirements for the Supply Chain Indicator 5.13.2 Major		
Statement of Nonconformity:	The information input to management review of RSPO SCCS were not sufficient according to the RSPO minimum requirement.		
Requirement Reference:	<p>The input to management review shall include information on:</p> <p>Results of internal audits covering RSPO Supply Chain Certification Standard.</p> <ul style="list-style-type: none"> - Customer feedback. - Status of preventive and corrective actions. - Follow-up actions from management reviews. - Changes that could affect the management system. - Recommendations for improvement. 		
Objective Evidence:	<p>Internal audit RSPO SCCS conducted on 8 – 9 January 2019, while management review conducted on 1 July 2019.</p> <p>According to “Notulen Management review” shown that:</p> <ul style="list-style-type: none"> - Result of audit discuss were not inline with audit result on 8 – 9 January 2019. There was 1 finding of RSPO SCCS however in the management review were not review/discussed. - Process performance and product conformity were review accordingly. - Customer feedback were not review accordingly and stated as N/A - Status of preventive and corrective action were not review accordingly and stated as N/A - Follow up action from previous management review were not review accordingly and stated as N/A - Changes that could affect the management system were not review and stated as N/A. - No proper attendant list were available. 		
Corrections:	<ul style="list-style-type: none"> • Bungo Tebo POM management has conducted re management review on 30 October 2019. Minutes of management review can be demonstrated as per “Notulen Management Review” dated 30 October 2019. Management review attend by Mill manager and its suborbdiat. Input of management review has include: <ul style="list-style-type: none"> ✓ Result of audit both internal and external audit. There were 3 issue discussing from internal and external audit and follow up action has been taken and addressed accordingly. ✓ Process performance and product conformity: there were 3 issues discussed regarding QC visit result such as kernel losses and Unstrip Bunch losses. Correction and corrective action to addressed the issue has been done. 		

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	<ul style="list-style-type: none"> ✓ Recommendation for improvement: there were 2 issues discussed regarding VE result such as: improving the electromotor and water recycling from boiler door cooling water to water basin. ✓ Customer feedback: There were issues feedback regarding the transporter input to assist the broken unit of CPO transport during transporting within the plantation road. ✓ Status of Preventive and corrective action: The status of corrective and preventive action has been closed and effectively implemented. ✓ Follow up actions from previous management review: The issues raised from previous management review has been followed up accordingly. ✓ Changes that could affect the management system: There is no changing in the mill operation and management system.
Root Cause Analysis:	<ul style="list-style-type: none"> • Lack of understanding from management regarding the requirement of management review input according to RSPO SCCS 2017 standard. • Management review has been conducted regularly by Bungo Tebo POM management, however the agenda is only specific to review the operation performance.
Corrective Actions:	<ul style="list-style-type: none"> • Group Manager PT Rigunas Agri Utama has issued the Memorandum No. 002/RAU/MEMO/10/19 dated 31 October 2019 concerning the standard of management review of RSPO Supply chain for Mill and KCP according to RSPO SCCS 2017. • Management PT Rigunas Agri Utama has conducted the training regarding RSPO SCCS 2017 including the requirement of Management review input. The training deliver by Head Office personel Welly Joel to PIC Sustainability PT Rigunas Agri Utama – Bungo Tebo POM and Bungo tebo POM & KCP personel on 7 November 2019. Record of training including training material, minutes of training and attendant list are available and can be demonstrated. • Management review schedule and program has been made by Mill management as per "Jadwal Rapat Management Review SCCS 2019 – 2020" dated 29 October 2019. Management review scheduled twice a year in April and October 2020.
Assessment Conclusion:	<p>Auditor conclude that company has effectively addressed the issue of non conformity. Management review has been done accordingly refer to RSPO SCCS requirement. All issue has been discussed related to performance implementation of RSPO SCCS. Mill Manager and the team has understanding on RSPO SCCS standard and requirement particularly for management review. Management review schedule and program has been made as well.</p> <p>The NC are remain closed.</p>

Non-conformity			
NCR Ref #	1839713-201910-M3	Date Issued	25 October 2019
Due Date	22 January 2020	Date of nonconformity Closure	13 November 2019
Clause & Category (Critical / Minor)	General Chain of Custody Requirements for the Supply Chain Indicator 5.13.3 Major		

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Statement of Nonconformity:	Action taken from the management review result were not appropriate due to the insufficient input of management review.
Requirement Reference:	<p>The output from the management review shall include any decisions and actions related to:</p> <ul style="list-style-type: none"> - Improvement of the effectiveness of the management system and its processes. - Resource needs.
Objective Evidence:	<p>Internal audit RSPO P & C conducted on 1 – 4 October 2019. Internal audit RSPO SCCS conducted on 8 – 9 January 2019, while management review conducted on 1 July 2019.</p> <p>According to "Notulen Management review" shown that:</p> <ul style="list-style-type: none"> ✓ Result of audit discuss were not inline with audit result on 8 – 9 January 2019. There was 1 finding of RSPO SCCS however in the management review were not review/discussed. ✓ Process performance and product conformity were review accordingly. ✓ Customer feedback were not review accordingly and stated as N/A ✓ Status of preventive and corrective action were not review accordingly and stated as N/A ✓ Follow up action from previous management review were not review accordingly and stated as N/A ✓ Changes that could affect the management system were not review and stated as N/A. ✓ No proper attendant list were available.
Corrections:	Bungo Tebo POM management has conducted re management review on 30 October 2019. Minutes of management review can be demonstrated as per "Notulen Management Review" dated 30 October 2019. Management review attend by Mill manager and its suborbdinat. output of management review has include the Improvement of the effectiveness of the management system and its processes and resource needs.
Root Cause Analysis:	<ul style="list-style-type: none"> • Lack of understanding from management regarding the requirement of management review input according to RSPO SCCS 2017 standard. • Management review has been conducted regularly by Bungo Tebo POM management, however the agenda is only specific to review the operation performance.
Corrective Actions:	<ul style="list-style-type: none"> • Group Manager PT Rigunas Agri Utama has issued the Memorandum No. 002/RAU/MEMO/10/19 dated 31 October 2019 concerning the standard of management review of RSPO Supply chain for Mill and KCP according to RSPO SCCS 2017. • Management PT Rigunas Agri Utama has conducted the training regarding RSPO SCCS 2017 including the requirement of Management review input. The training deliver by Head Office personel Welly Joel to PIC Sustainability PT Rigunas Agri Utama – Bungo Tebo POM and Bungo tebo POM & KCP personel on 7 November 2019. Record of training including training material, minutes of training and attendant list are available and can be demonstrated. • Management review schedule and program has been made by Mill management as per "Jadwal Rapat Management Review SCCS 2019 – 2020"

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	dated 29 October 2019. Management review scheduled twice a year in April and October 2020.
Assessment Conclusion:	Auditor conclude that company has effectively addressed the issue of non conformity. Management review has been done accordingly refer to RSPO SCCS requirement. All input required in RSPO SCCS has been discussed related to performance implementation of RSPO SCCS. The output of management review has inline with the input discussed. Mill Manager and the team has understanding on RSPO SCCS standard and requirement particularly for management review. Management review schedule and program has been made as well. The NC are remain closed.

Non-conformity															
NCR Ref #	1839713-201910-M4	Date Issued	25 October 2019												
Due Date	22 January 2020	Date of nonconformity Closure	13 November 2019												
Clause & Category (Critical / Minor)	General Chain of Custody Requirements for the Supply Chain Indicator 5.9.1 Major														
Statement of Nonconformity:	There are discrepancy between CSPK sold volume and CSPK delivery according to Book Keeping Mass Balance during period March October 2019. It was indicated over sold volume of CSPK.														
Requirement Reference:	The organization shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements.														
Objective Evidence:	According to delivery for of CSPK and CSPK Book Keeping Mass Balance 2019, shown that since March – October 2019, CSPK delivery to KCP Bungo Tebo was 3,727.400 MT. Whilst according to RSPO Palm trace Transaction, since 2019 (March – October 2019), confirmed that the volume of CSPK transaction was 4,509.76 MT. There was discrepancy of 782 MT of CSPK sold volume.														
Corrections:	Review and correcting the book keeping period January – November 2019 according to actual CPO delivery and for the further transaction shipping announcement will be made immediately after the transaction done. Bungo Tebo POM has review the book keeping period January – November 2019. According to book keeping, it can be demonstrated that during period January – November 2019, certified PK delivery of Bungo Tebo POM was 4,783.760 MT, while CSPK sold volume based on Plamtrace transaction, during new licence period 2019 (March – October 2019) was 4,509.76 MT. Below are the detail of CSPK delivery vs Announcement Palmtrace RSPO since December 2018 – October 2019:														
	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 25%;">Month</th> <th style="width: 25%;">CSPK Delivery (MT)</th> <th style="width: 25%;">CSPK Announcement Palmtrace (MT)</th> </tr> </thead> <tbody> <tr> <td>January 2019</td> <td style="text-align: center;">567.730</td> <td style="text-align: center;">-</td> </tr> <tr> <td>February 2019</td> <td style="text-align: center;">317.650</td> <td style="text-align: center;">-</td> </tr> <tr> <td>March 2019</td> <td style="text-align: center;">379.820</td> <td style="text-align: center;">1,717.750</td> </tr> </tbody> </table>	Month	CSPK Delivery (MT)	CSPK Announcement Palmtrace (MT)	January 2019	567.730	-	February 2019	317.650	-	March 2019	379.820	1,717.750		
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January 2019	567.730	-													
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	April 2019	299.330	-
	May 2019	727.080	-
	June 2019	378.300	-
	July 2019	591.690	243.22
	August 2019	497.430	906.67
	September 2019	382.260	1,444.45
	October 2019	642.470	197.67
	Total	4,783.760	4,509.76
<p>There are CSPK delivery on January and February as much as 885.380 MT, while the announcement was done on March 2019. So that there is no overs sold volume during period March – October 2019 according to actual transaction of CSPK delivery.</p> <p>Data seen during audit:</p> <ul style="list-style-type: none"> • CSPK Delivery Form January 2019 No. KCP PBT 4101 SS, dated 31 January 2019, quantity 567,730 MT, Certified PK RSPO 620917. • CSPK Delivery Form February 2019 No. KCP PBT 4102 SS, dated 28 February 2019, quantity 317,650 MT, Certified PK RSPO 620917. <p>Marketing team, Mill management and sustainability RO has made coordination to fix the RSPO palmtrace announcement based on actual delivery and directly announce after CSPK delivery.</p>			
Root Cause Analysis:	<ul style="list-style-type: none"> • Announcement in plamtrace was done based on CPKO delivery with conversion factor 45% and Shipping announcement was done after 3 month delivery. • There are CSPK delivery/sold on period January & February 2019, while the announcement in Palm trace was done on March 2019. 		
Corrective Actions:	<ul style="list-style-type: none"> - Monitoring of book keeping each month and ensuring the CSPK delivery is made from positive stock and balance in 3 month period. - Ensuring the shipping announcement at Palmtrace transaction was done after CSPK delivery/sales. 		
Assessment Conclusion:	<p>Auditor conclude that company has effectively addressed the issue of non conformity. Correction data of book keeping and mass balance of CSPK has demonstrated and there is no over sold volume of CSPK based on actual transaction. Company has commitment to announce the next transaction at the Palmtrace immediately no later than one month.</p> <p>The NC are remain closed.</p>		

Non-conformity			
NCR Ref #	1839713-201910-M5	Date Issued	25 October 2019
Due Date	22 January 2020	Date of nonconformity Closure	13 November 2019
Clause & Category (Critical / Minor)	Module E Mass Balance, E.5.1.c Major		

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Statement of Nonconformity:	There are over sold volume of CSPK on period 2019 (March – October 2019) compare to Book Keeping Mass Balance of PK 2019 period March – October 2019.																																				
Requirement Reference:	The site can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three months. However, a site is allowed to sell short.(ie product can be sold before it is in stock.)																																				
Objective Evidence:	<p>According to delivery for of CSPK and CSPK Book Keeping Mass Balance 2019, shown that since March – October 2019, CSPK delivery to KCP Bungo Tebo was 3,727,400 MT.</p> <p>Whilst according to RSPO Palm trace Transaction, since 2019 (March – October 2019), confirmed that the volume of CSPK transaction was 4,509.76 MT.</p> <p>There was discrepancy of 782 MT of CSPK sold volume.</p>																																				
Corrections:	<p>Review and correcting the book keeping period January – November 2019 according to actual CPO delivery and for the further transaction shipping announcement will be made immediately after the transaction done.</p> <p>Bungo Tebo POM has review the book keeping period January – November 2019. According to book keeping, it can be demonstrated that during period January – November 2019, certified PK delivery of Bungo Tebo POM was 4,783.760 MT, while CSPK sold volume based on Plamtrace transaction, during new licence period 2019 (March – October 2019) was 4,509.76 MT. Below are the detail of CSPK delivery vs Announcement Palmtrace RSPO since December 2018 – October 2019:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center;">Month</th> <th style="text-align: center;">CSPK Delivery (MT)</th> <th style="text-align: center;">CSPK Announcement Palmtrace (MT)</th> </tr> </thead> <tbody> <tr> <td>January 2019</td> <td style="text-align: center;">567.730</td> <td style="text-align: center;">-</td> </tr> <tr> <td>February 2019</td> <td style="text-align: center;">317.650</td> <td style="text-align: center;">-</td> </tr> <tr> <td>March 2019</td> <td style="text-align: center;">379.820</td> <td style="text-align: center;">1,717.750</td> </tr> <tr> <td>April 2019</td> <td style="text-align: center;">299.330</td> <td style="text-align: center;">-</td> </tr> <tr> <td>May 2019</td> <td style="text-align: center;">727.080</td> <td style="text-align: center;">-</td> </tr> <tr> <td>June 2019</td> <td style="text-align: center;">378.300</td> <td style="text-align: center;">-</td> </tr> <tr> <td>July 2019</td> <td style="text-align: center;">591.690</td> <td style="text-align: center;">243.22</td> </tr> <tr> <td>August 2019</td> <td style="text-align: center;">497.430</td> <td style="text-align: center;">906.67</td> </tr> <tr> <td>September 2019</td> <td style="text-align: center;">382.260</td> <td style="text-align: center;">1,444.45</td> </tr> <tr> <td>October 2019</td> <td style="text-align: center;">642.470</td> <td style="text-align: center;">197.67</td> </tr> <tr> <td>Total</td> <td style="text-align: center;">4,783.760</td> <td style="text-align: center;">4,509.76</td> </tr> </tbody> </table> <p>There are CSPK delivery on January and February as much as 885.380 MT, while the announcement was done on March 2019. So that there is no overs sold volume during period March – October 2019 according to actual transaction of CSPK delivery.</p> <p>Data seen during audit:</p> <p>CSPK Delivery Form January 2019 No. KCP PBT 4101 SS, dated 31 January 2019, quantity 567,730 MT, Certified PK RSPO 620917.</p> <p>CSPK Delivery Form February 2019 No. KCP PBT 4102 SS, dated 28 February 2019, quantity 317,650 MT, Certified PK RSPO 620917.</p>	Month	CSPK Delivery (MT)	CSPK Announcement Palmtrace (MT)	January 2019	567.730	-	February 2019	317.650	-	March 2019	379.820	1,717.750	April 2019	299.330	-	May 2019	727.080	-	June 2019	378.300	-	July 2019	591.690	243.22	August 2019	497.430	906.67	September 2019	382.260	1,444.45	October 2019	642.470	197.67	Total	4,783.760	4,509.76
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	Marketing team, Mill management and sustainability RO has made coordination to fix the RSPO palmtrace announcement based on actual delivery and directly announce after CSPK delivery.
Root Cause Analysis:	<ul style="list-style-type: none"> Announcement in plamtrace was done based on CPKO delivery with conversion factor 45% and Shipping announcement was done after 3 month delivery. There are CSPK delivery/sold on period January & February 2019, while the annpouncement in Palm trace was done on March 2019.
Corrective Actions:	<ul style="list-style-type: none"> Monitoring of book keeping each month and ensuring the CSPK delivery is made from positive stock and balance in 3 month period. Ensuring the shipping announcement at Palmtrace transaction was done after CSPK delivery/sales.
Assessment Conclusion:	<p>Auditor conclude that company has effectively addressed the issue of non conformity. Correction data of book keeping and mass balance of CSPK has demonstrated and there is no over sold volume of CSPK based on actual transaction. Company has commitment to announce the next transaction at the Palmtrace immediately no later than one month.</p> <p>The NC are remain closed.</p>

Non-conformity			
NCR Ref #	1839713-201910-N1	Date Issued	25 October 2019
Due Date	Next Assessment	Date of nonconformity Closure	26/10/2020
Clause & Category (Critical / Minor)	RSPO P & C INA NI 2016 Indicator 4.1.3 Minor		
Statement of Nonconformity:	Record of monitoring of operations procedures at Plasma Bungo Tebo are available, however there is no evidence of follow-up actions.		
Requirement Reference:	Records of monitoring and any follow-up actions shall be available.		
Objective Evidence:	<p>Monitoring Pemeriksaan Kondisi Kapling for each KUD has been developed, however the follow up action were not available. It was also found during field visit:</p> <ul style="list-style-type: none"> Kavling 1369 KUD Sawit Tanduk Perkasa: weeds condition uncontrolled. According to monitoring result on 31/07/2019 also confirmed that weeds condition were uncontrolled, 1 boundary pegs were not available. There is no follow up action. Kavling 1362 KUD Sawit Tanduk Perkasa: Frond stacking were not implemented, 1 boundary pegs were not available. According to monitoring result on 31/07/2019 1 boundary pegs were not available. There is no follow up action. Kavling 407 KUD Sumay Makmur: 1 boundary pegs were not available, weeds condition uncontrolled, frond stacking were not implemented. Monitoring result on 07/01/2019 were not follow up. Kavling 280 KUD Sumay makmur: weeds condition uncontrolled, frond stacking were not implemented 		

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	<ul style="list-style-type: none"> - Kavling 475 KUD Barokah: 1 boundary pegs were not available, frond stacking were not implemented. - Kavling 668 KUD Barokah: weeds condition uncontrolled, frond stacking were not implemented - Kavling 1529 KUD Sawit Makmur Bersama: weeds condition uncontrolled, frond stacking were not implemented - Kavling 1375 KUD Sawit Tanduk Perkasa: weeds condition uncontrolled, frond stacking were not implemented. - Based on Monitoring result on 07/01/2019 above which done by Plasma Management Bungo Tebo, there is no follow up action were evident against the finding.
Corrections:	Review regularly the monitoring result of smallholder block to determine the follow up action and record all the follow up action taken and kept the record at the Plasma Office.
Root Cause Analysis:	<ul style="list-style-type: none"> - Socialization and awareness program to smallholder member regarding block upkeep in best management practices of agronomy KLO 2019 – 2020. - Conduct an inventory of non-standard plots and follow up on weed control and fronds stacking.
Corrective Actions:	Review regularly the monitoring result of smallholder block to determine the follow up action and record all the follow up action taken and kept the record at the Plasma Office.
Assessment Conclusion:	<p>Audit Team verified that the unit of certification has implemented corrective action as follows:</p> <ul style="list-style-type: none"> - Kebun Plasma Bungo Tebo has made the socialization and awareness program to smallholder member regarding block upkeep in best management practices of agronomy KLO 2019 – 2020. Program is applicable at all KUD. Dissemination program has been implemented. - Program of monitoring smallholder plantation block/kavling condition also has been made by Plasma Bungo Tebo each month. The monitoring result also review by Plasma Bungo Tebo through monthly management review (Estate Monthly Meeting). Monitoring of block condition is implemented. - In addition, Plasma Bungo Tebo management has issued the Memorandum No. 020/RAU/KLO/MEMO/10/19 dated 28 October 2019. Memorandum is concerning Role and Responsibility "Rencana Jangka Panjang Pemasangan Patok kavling". <p>Audit Team conclude that Minor Non-Conformity is closed.</p>

Opportunity for Improvement	
OFI#	Description
OFI 1	<p>OFI Statement: Nil</p> <p>Verification / Follow-up actions:</p>

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1137714M1	Major	1.1.1	19/12/2014	closed on 17/06/2015
1137714M2	Major	1.1.2	19/12/2014	closed on 17/06/2015
1137714M3	Major	1.2.1	19/12/2014	closed on 17/06/2015
1137714M4	Major	2.1.1	19/12/2014	closed on 17/06/2015
1137714M5	Major	2.2.1	19/12/2014	closed on 17/06/2015
1137714M6	Major	4.7.1	19/12/2014	closed on 17/06/2015
1137714M7	Major	4.7.2	19/12/2014	closed on 17/06/2015
1137714M8	Major	4.8.1	19/12/2014	closed on 17/06/2015
1137714M9	Major	5.6.2	19/12/2014	closed on 17/06/2015
1137714M10	Major	5.2.2	19/12/2014	closed on 17/06/2015
1137714M11	Major	6.1.3	19/12/2014	closed on 17/06/2015
1137714M12	Major	6.4.1	19/12/2014	closed on 17/06/2015
1137714M13	Major	6.4.2	19/12/2014	closed on 17/06/2015
1137714M14	Major	6.13.1	19/12/2014	closed on 17/06/2015
1137714M15	Major	6.3.2	19/12/2014	closed on 17/06/2015
1137714M16	Major	6.7.1	19/12/2014	closed on 17/06/2015
1137714N1	Minor	1.3.1	19/12/2014	closed on 22/09/2016.
1137714N2	Minor	2.1.2	19/12/2014	Escalated into Major NC #1378035M4. Closed on 11/11/2016.
1137714N3	Minor	2.1.3	19/12/2014	Escalated into Major NC #1378035M4. Closed on 11/11/2016.
1137714N4	Minor	2.2.2	19/12/2014	Escalated into Major NC #1378035M4. Closed on 11/11/2016.
1137714N5	Minor	3.1.2	19/12/2014	closed on 22/09/2016.
1137714N6	Minor	4.7.5	19/12/2014	closed on 22/09/2016.
1137714N7	Minor	4.8.2	19/12/2014	closed on 22/09/2016.
1137714N8	Minor	4.1.2	19/12/2014	closed on 22/09/2016.
1137714N9	Minor	5.1.2	19/12/2014	closed on 22/09/2016.
1137714N10	Minor	5.1.3	19/12/2014	closed on 22/09/2016.
1137714N11	Minor	5.3.3	19/12/2014	closed on 22/09/2016.

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1137714N12	Minor	5.2.3	19/12/2014	Escalated into Major NC #1378035M12. Closed on 21/11/2016.
1137714N13	Minor	5.2.4	19/12/2014	closed on 22/09/2016.
1137714N14	Minor	6.1.4	19/12/2014	Escalated into Major NC #1378035M14. Closed on 21/11/2016.
1137714N15	Minor	6.2.3	19/12/2014	closed on 22/09/2016.
1137714N16	Minor	6.10.1	19/12/2014	closed on 22/09/2016.
1137714N17	Minor	6.10.4	19/12/2014	closed on 22/09/2016.
1137714N18	Minor	6.11.1	19/12/2014	closed on 22/09/2016.
1378035M1	Major	1.1.2	22/09/2016	closed on 21/11/2016.
1378035M2	Major	1.2.1	22/09/2016	closed on 21/11/2016.
1378035M3	Major	2.1.1	22/09/2016	closed on 21/11/2016.
1378035M4	Major	2.1.2	22/09/2016	closed on 21/11/2016.
1378035M5	Major	2.1.3	22/09/2016	closed on 21/11/2016.
1378035M6	Major	2.2.2	22/09/2016	closed on 21/11/2016.
1378035M7	Major	2.3.1	22/09/2016	closed on 21/11/2016.
1378035M8	Major	4.6.5	22/09/2016	closed on 21/11/2016.
1378035M9	Major	4.7.1	22/09/2016	closed on 21/11/2016.
1378035M10	Major	4.7.2	22/09/2016	closed on 21/11/2016.
1378035M11	Major	4.7.3	22/09/2016	closed on 21/11/2016.
1378035M12	Major	5.2.3	22/09/2016	closed on 21/11/2016.
1378035M13	Major	5.3.1	22/09/2016	closed on 21/11/2016.
1378035M14	Major	6.1.4	22/09/2016	closed on 21/11/2016.
1378035M15	Major	6.7.1	22/09/2016	closed on 21/11/2016.
1378035M16	Major	6.8.1	22/09/2016	closed on 21/11/2016.
1378035M17	Major	6.9.1	22/09/2016	closed on 21/11/2016.
1378035M18	Major	6.9.2	22/09/2016	closed on 21/11/2016.
1378035M19	Major	6.13.1	22/09/2016	closed on 21/11/2016.
1378035N1	Minor	4.1.2	22/09/2016	Escalated into Major NC #1550974-201711-M1. Closed on 17/01/2018.
1378035N2	Minor	4.3.6	22/09/2016	Escalated into Major NC #1550974-201711-M2. Closed on 17/01/2018.
1378035N3	Minor	6.9.3	22/09/2016	Closed on 21/11/2017

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1550974-201711-M1	Major	4.1.2	22/11/2017	Closed on 17/01/2018
1550974-201711-M2	Major	4.3.6	22/11/2017	Closed on 17/01/2018
1550974-201711-M3	Major	4.6.6	22/11/2017	Closed on 17/01/2018
1550974-201711-M4	Major	4.7.1	22/11/2017	Closed on 17/01/2018
1550974-201711-M5	Major	4.7.3	22/11/2017	Closed on 17/01/2018
1550974-201711-M6	Major	5.3.2	22/11/2017	Closed on 17/01/2018
1550974-201711-M7	Major	SCC-E.5.1	22/11/2017	Closed on 19/12/2017
1550974-201711-N1	Minor	5.3.3	22/11/2017	Escalated to MAJOR 1679639-201809-M4
1679639-201809-M1	Major	2.1.1	27/09/2018	Closed on 22-23/11/2018
1679639-201809-M2	Major	4.5.1	27/09/2018	Closed on 22-23/11/2018
1679639-201809-M3	Major	4.7.2	27/09/2018	Closed on 22-23/11/2018
1679639-201809-M4	Major	5.3.3	27/09/2018	Escalation of Minor 1550974-201711-N1
1679639-201809-M5	Major	6.5.1	27/09/2018	Closed on 22-23/11/2018
1679639-201809-M6	Major	6.12.1	27/09/2018	Closed on 22-23/11/2018
1679639-201809-N1	Minor	2.2.2	27/09/2018	Escalated to Major NC 1839713-201910-M1, Closed on 13 November 2019
1679639-201809-N2	Minor	4.7.6	27/09/2018	Closed on 24/10/2019
1679639-201809-N3	Minor	4.6.4	27/09/2018	Closed on 24/10/2019
1679639-201809-N4	Minor	4.7.7	27/09/2018	Closed on 24/10/2019
1839713-201910-M1	Major	2.2.2	25/10/2019	Closed on 13 November 2019
1839713-201910-M2	Major	SCC 5.13.2	25/10/2019	Closed on 13 November 2019
1839713-201910-M3	Major	SCC 5.13.3	25/10/2019	Closed on 13 November 2019
1839713-201910-M4	Major	SCC 5.9.1	25/10/2019	Closed on 13 November 2019
1839713-201910-M5	Major	SCC E.5.1.c	25/10/2019	Closed on 13 November 2019
1839713-201910-N1	minor	4.1.3	25/10/2019	Closed on 26 October 2020
1839713-201910-N2	minor	6.7.2	25/10/2019	Closed on 26 October 2020
1976739-202010-N1	minor	1.2.1	28/08/2020	Closed on 03/11/2021

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1976739-202010-N2	minor	6.7.2	28/10/2020	Closed on 03/11/2021
2127485-202110-M1	Critical	6.7.3	03/11/2021	Closed on 26/01/2022
2127485-202110-N1	minor	3.3.3	03/11/2021	Open
2127485-202110-N2	minor	7.2.5	03/11/2021	Open
2127485-202110-N3	minor	6.2.7	03/11/2021	Open

3.4 Stakeholders and previous land owner / user consultation

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss PT Rigunas Agir Utama – Bungo Tebo Palm Oil Mill Certification Unit’s environmental and social performance, legal and any known dispute issues.

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

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

Stakeholders contacted		
Type of Stakeholder (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	Stakeholder name / organization	Means of communication (e.g. face to face interview, email, phone interview, comment from public notice)
Governmental Department	Dinas Lingkungan Hidup Kabupaten Tebo Bpk. Muhamad Nur	Phone interview
Governmental Department	Dinas Perkebunan, Peternakan dan Perikanan Kabupaten Tebo Bpk. Rafik	Phone interview
Governmental Department	Dinas Tenaga Kerja Kabupaten Tebo Bpk. Ikbal (Bodang Norma Kerja), Bpk. Asrul (Bidang IK3)	Phone interview
Communities	Village head Bpk. Herman - Tuo Sumay Village Bpk. Sopli – Teriti Village Bpk. Sopian – Dusun Tanjung Dani	Phone interview
NGO	LSM Merah Putih Bpk. Doni	Phone interview

	Portal Tebo / Ketua Ketua Lembaga Pemantau Penyelamat Lingkungan Hidup (LP2LH) Bpk. Hari irawan	
Union	Serikat Pekerja PUK SPPP-SPSI Sdr. Ahmad Dian (Sekretaris PUK SPPP-SPSI)	Phone interview
Internal	Gender Committee Ibu Ms. Nurbaiti (Ketua Komite Gender PT RAU)	Phone interview

Stakeholders comment	
1	<p>Feedbacks: Dinas Lingkungan Hidup Kabupaten Tebo Bpk. Muhamad Nur</p> <ul style="list-style-type: none"> - The company PT Rigunas Agri Utama has obtain environmental permit and is currently still valid. For example for land application and Temporary hazardous waste storage permits. - The company actively submits regular reports for environmental management and monitoring, for example RKL/RPL every semester. - The Environmental Service actively visits the company PT Rigunas Agri Utama for checking the implementation of environmental regulation for Palm Oil Mill and Estate - There were complaints receive from the people of Dusun Tanjung Dani on August 11, 2021 related to the alleged leakage of liquid waste applications (land application) in block B19 Afdeling II Bungo Tebo Estate and into the Batang Sumay River. <p>Audit Team verification and response:</p> <ul style="list-style-type: none"> - Environmental Permits have been fulfilled by the company in accordance with environmental regulations. - Routine environmental reports are reported to the Environment Agency such as: Tebo Regency, Jambi Province, PPE (Ecoregional Management Center) Sumatera and the Ministry of Environment. - Guidance and supervision by the Environmental Service are routinely carried out, until November 2021, 1 visit has been recorded. - The company has established a mechanism for handling complaints from external parties in the "Stakeholder Complaint Handling Mechanism" dated 22 April 2019. There is also procedure no. SOP AA-GL-510.1.R0 dated January 1, 2013 regarding the Handling of Public Complaints. The company has also provided a channel for reporting to report in case of violations of the principles and objectives, via email whistleblow@rgei.com or telephone (+62) 81 2755 2528. <p>PT Rigunas Agri Utama has carried out follow-up and field checks with DLH Kabupaten Tebo. On August 18, 2021, field verification was carried out by members of Commission III of the Tebo Regency Regional People's Representative Council (DPRD) and the Tebo Regency Environmental Agency. Then after verification, an Exposure and Field Verification Follow-up meeting was held on August 23, 2021 (based on an invitation letter from Environment Agency of Tebo Regency dated August 19, 2021 No. 660/370/DLHP-II/2021) regarding Exposure and Discussion Follow-up on Field Verification results).</p> <p>Follow up from the exposure meeting result on August 23, 2021, the audience was held on August 26, 2021, which was attended by the Head of Environmental Agency, Chairman of PC PMII Tebo Regency,</p>

	<p>Kanit Ekonomi Satintelkam Tebo Police, DPP LP2LH, and representatives of PT RAU management, with the following hearing results:</p> <ul style="list-style-type: none"> ✓ Branch Manager PMII Kab. Tebo conveyed their aspirations towards Environmental Agency Tebo Regency, related to the effectiveness in carrying out the main tasks and supervision that has been carried out by the Environmetla Agency of Tebo Regency. ✓ The main duties and functions of the Environmental Agency Tebo Regency have been explained. Environmental Agency Tebo Regency has supervised the company at least once a year and reported to the Regent and DPRD Tebo Regency. This is due to limited facilities and budget. ✓ PT Rigunas Agri Utama has explained the follow-up action carried out by the company according to the Minutes of the results of the supervision and follow-up will be completed no later than January 2022. ✓ All follow-up actions taken by the company will be re-evaluated in the field <ul style="list-style-type: none"> ✓ The alleged environmental pollution originating from the Mill waste of PT Rigunas Agri Utama will be given administrative sanction ✓ Environmental Agency of Tebo Regency will publish Laboratory Test Results on water samples taken during field supervision. <p>Decision result from evaluation by Environmental Agency of Tebo Regency after company follow-up deadline is January 2022. Laboratory test results on water samples taken during supervision by Environmental Agency of Tebo Regency (at the time of the audit document has not been published/published yet).</p>
<p>2</p>	<p>Feedbacks: Dinas Perkebunan, Peternakan dan Perikanan Kabupaten Tebo Bpk. Rafik</p> <ul style="list-style-type: none"> - The company PT Rigunas Agri Utama regularly submits a Plantation Business Development Report (LPUP) every semester. The first semester of 2021 LPUP report has been reported. - The Plantation business class assessment was carried out in 2021 with result: Class II (Good) with a validity period of 3 years. - There is an issue of overlapping indications of PT. RAU with SHM (certificate land title) of the Pinang Belai Village community as many as 293 parcels, curently are in the process of being finalized at the Tebo Regency Government through the TP3K Team (Regency Plantation Development Supervisor) since August 2016. <p>Audit Team verification and response:</p> <ul style="list-style-type: none"> - All of these issue have been mediated by the Tebo Regent through Letter No. 005/1347/Disbun/2016, dated November 16, 2016 and also by the Plantation Office of Tebo Regency through letter No. 525 /395/Disbun/2016, dated November 28, 2016. <p>The results of the meeting concluded that the disputed area will be legally resolved through an inventory of legal aspects where the collection of 294 copies of community ownership certificates (SHM) issued in 2016 and HGU PT. Rigunas Agri Utama will be combined together. In addition, a participatory field inspection will be carried out to ensure that the disputed location can be traced.</p> <p>Based on the results of the meeting on November 30, 2016, it was concluded that the implementation of the field check was postponed after data synchronization was carried out. The implementation of data synchronization will be carried out at the Jambi Province Regional Office (Office of the Ministry of Agrarian and Spatial Planning/BPN Jambi Province). Minutes of the meeting were signed by multi stakeholder/parties: Plt. Sekretaris Daerah Kabupaten Tebo, Kepala Kantor Kesbangpol Kabupaten Tebo, Kapolsek Serai Serumpun, KBO Intelkam Polres Tebo, Kabid Bina Usaha Dinas Perkebunan Tebo, Kasi Survey, Pengukuran dan Pemetaan BPN Tebo, Kasi HT&PT BPN Kabupaten Tebo, Kasi Wasnas Kantor Kesbangpol Kabupaten Tebo, Kasi Rehabilitasi Kantor LH Kabupaten Tebo, Kasi Trantib</p>

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	<p>Kecamatan Serai Serumpun, Staf Dinas Kehutanan Kabupaten Tebo, GM PT. Rigunas Agri Utama, Humas PT. Rigunas Agri Utama, GIS PT. Rigunas Agri Utama.</p> <p>On August 13, 2019, a mediation was held which was attended by the Mitra Serumpun Farmer Group (Community), PT Rigunas Agri Utama, the Police, the Indonesian National Army and the National Land Agency (BPN) with an agenda to discuss the alleged conflict of overlapping HGU owned by PT RAU with the Property Rights. Community (Farmers Group), and the results of the mediation are stated in the Minutes of the Implementation of the Mediation:</p> <ul style="list-style-type: none"> ✓ Based on suggestions and input from the Tebo District Police and the Indonesian National Armed Forces (TNI), in order to maintain a conducive environment for security and comfort at the location of the disputed object, PT RAU and the community (Mitra Serumpun Farmer Group) are requested to exercise restraint. by not carrying out activities on the object of the dispute while waiting for further legal proceedings that have permanent legal force. ✓ Both parties must refrain from maintaining security and order in the environment on the object of dispute and not doing things that violate the law ✓ PT RAU was requested to immediately process the lawsuit to the State Administrative Court. <p>Furthermore, PT Rigunas Agri Utama has provided responses and answers to the results of the mediation above on August 15, 2019 through letter no. 06/LG-RIGUNAS/Ext/VIII/19, contains the explanation:</p> <ul style="list-style-type: none"> ✓ PT RAU controls and operates a plot of oil palm plantation in Sungai Rambai Village, Tebo Ulu District, Tebo Regency, Jambi Province with area of 1,047,354 Ha as referred to in HGU certificate no. 17 (formerly No.1, dated May 1, 1997) which was granted based on the Decree of the Minister of State for Agrarian Affairs/Head of the National Land Agency No. 51/HGU/BPN/1996 dated 27 November 1996. ✓ That the HGU has been controlled and planted with oil palm since 1996 without any claims or lawsuits from the community or from any party. <p>At the end of 2020, PT. Rigunas Agri Utama fulfills the summons of the Tebo Prosecutor's Office, based on the Tebo District Prosecutor's Letter No.R-33/L.S.17/Dek.1/11/2020 November 11, 2020; To the PT. Rigunas Agri Utama; Regarding the Request for Information to appear on November 17, 2020.</p> <p>Based on the Minutes of the Prosecutor's Summons dated November 1, 2021 regarding the Land Overlap of 294 Ha, that:</p> <ul style="list-style-type: none"> ✓ The Tebo State Prosecutor's Office questioned the legality of PT. RAU ✓ Request HGU Certificate of PT. RAU ✓ PT. RAU was represented by GM PT. RAU (Bibit Sembiring), SSL Jambi (Andra Tanady) and Public Relations (A. Bastari) provided all documents requested by the prosecutor's office (Kasi Datun Kejari Tebo) <p>PT RAU has shown evidence of efforts to resolve land dispute cases and has reported to BPN Tebo Regency.</p> <p>Until this recertification audit is carried out, the settlement of this case has arrived at the District Attorney, this has been verified based on the Tebo Prosecutor's Office Letter No.R-33/L.S.17/Dek.1/11/2020 dated 11 November 2020; To PT. Rigunas Agri Utama; Regarding the Request for Information to appear on November 17, 2020.</p>
<p>3</p>	<p>Feedbacks:</p> <p>Dinas Tenaga Kerja Kabupaten Tebo Bpk. Ikbal (Bidang Norma Kerja), Bpk. Asrul (Bidang IK3)</p> <ul style="list-style-type: none"> - There are no child laborers under the age of 18 at PT Rigunas Agri Utama. - The company PT Rigunas Agri Utama has a Labor Union with the name PUK SPPP-SPSI, administratively it is complete and registered in Dinas tenaga Kerja Tebo Regency.

	<ul style="list-style-type: none"> - The company PT Rigunas Agri Utama provides wages for its employees in accordance with the Jambi Province minimum wages (UMP) 2021. - There were no industrial relations cases in the 2021 period. <p>Audit Team verification and response:</p> <ul style="list-style-type: none"> - PT Rigunas Agri Utama has performed its obligations related to employment. - The determination of the workers union has been verified based on the following documents: <ul style="list-style-type: none"> ✓ Registration of Workers Unions at the Disnakertrans Kabupaten Tebo No. 02/SP-SB/HISK/2013 dated September 9, 2013. ✓ Report on the management structure of SPPP-SPSI PUK to the Disnakertrans Kabupaten Tebo No. 560/621 Perindagnaker/2019 dated 11 October 2019. - Wage determination has been verified through the following documents: <ul style="list-style-type: none"> ✓ Jambi Governor Decree SK no. 883/KEP.GUB/DISNAKERTRANS-3.3/2020, 20 November 2020; concerning: "Stipulation of Jambi Province Minimum Wage in 2021" ✓ Management Memorandum No. 015/HR-AAS/MEMO/04/21 dated April 30, 2021 regarding Directions for Wage Increases for 2021
<p>4</p>	<p>Feedbacks: Village head Bpk. Herman - Tuo Sumay Village Bpk. Sopli – Teriti Village Bpk. Sopian – Dusun Tanjung Dani</p> <ul style="list-style-type: none"> - Positive benefits from the existence of the company PT Rigunas Agri Utama: improving the community's economy, being able to work in the company. Farmers/smallholder can sold their palm oil fruit to Bungo Tebo Palm oil Mill. The monthly round of money in Tuo Sumay village is around Rp. 300 million. - After the existence of companies, new businesses develop in the community. - Every year the company provides assistance to the community in the form of an annual CSR program. - The community still preserves local culture and local wisdom, namely musical arts activities that are staged during the celebration of kenduri. - Some issue: <ul style="list-style-type: none"> ✓ Tuo Sumay Village: there is an issue of conflict (overlapping) over an area of 294 parcels of land. ✓ Dusun Tanjung Dani: there were complaints of water pollution from the Batang Sumay River in August 2021. <p>Audit Team verification and response:</p> <ul style="list-style-type: none"> - The company has built plasma plantations for villages around the plantation (18 KUD). - The CSR program and realization have been verified based on the Corporate Social Responsibility (CSR) Implementation Report for the Plantation and Palm Oil Mill and Bungo Tebo Plasma Plantation of PT. Rigunas Agri Utama period January-June 2021. - For the issue raised by Tuo Sumay Village and Dusun Tanjung Dani Sakti has been explained in feedback number 1 and 2 above.
<p>5</p>	<p>Feedbacks: LSM Merah Putih Bpk. Doni Portal Tebo / Ketua Ketua Lembaga Pemantau Penyelamat Lingkungan Hidup (LP2LH) Bpk. Hari irawan</p>

	<p>On August 11, 2021, there were allegations of contamination of the Batang Sumay River as a result of the activities of one of the companies (PT RAU) in the area, precisely in Dusun Tanjung Dani, an investigation was carried out and found some evidence.</p> <p>For this incident, LP2LH reported the incident to the Environmental Agency of Tebo Regency.</p> <p>Audit Team verification and response:</p> <p>The issue is related to the alleged leakage of liquid waste applications in block B19 Afdeling II Bungo Tebo Estate and into the Batang Sumay River.</p> <p>It has been submitted to the Environmental Agency of Tebo Regency and has been explained in response to the issues that occurred to the Environmental Agency of Tebo Regency as explained in feedback number 1 above from Environmental Agency of Tebo Regency.</p> <p>PT Rigunas Agri Utama has explained and the follow-up carried out by the company according to the Minutes of the results of the supervision and follow-up will be completed no later than January 2022.</p>
<p>6</p>	<p>Feedbacks:</p> <p>Serikat Pekerja PUK SPPP-SPSI Sdr. Ahmad Dian (Sekretaris PUK SPPP-SPSI) Gender Committee Ibu Ms. Nurbaiti (Ketua Komite Gender PT RAU)</p> <ul style="list-style-type: none"> - The company has implemented protection of women's reproductive rights, in the form of maternity leave, menstrual leave, and routine pregnancy check-ups for spraying women and strictly prohibits pregnant and/or breastfeeding female workers from using pesticides. - PT RAU, that until 2021 there are no cases or work practices with violence or threats against workers. - The list of workers for mill and plantation estates states that all workers come from different backgrounds (race, religion, gender, etc.). - No discrimination; Diversity of workers based on religion, ethnicity, gender. There is no evidence of discrimination. - The company has facilitated and provided easy access to affordable food and daily necessities and so far no problems. - The application of wages is in accordance with the regulations set by the government for the period 2021, based on the Jambi Governor's 2020 decision. - There are no issues related to employment at PT RAU. <p>Audit Team verification and response:</p> <p>This is a positive response related to employment and workers' rights that has been given by PT RAU. Several workers' salary slips have been verified for the September 2021 period above, PT RAU has set wages according to the situation and conditions of the scope of work in accordance with the laws and regulations.</p> <p>The implementation of company policies related to discrimination, prevention of sexual harassment and violence, has been verified through interviews with several workers at PT RAU.</p> <p>It has been verified through an interview with the Head of the District Manpower Office. Tebo, that there were no industrial relations cases in the 2021 period.</p> <p>To ensure the implementation of company policies that have been set, the auditor team will always verify at the next audit.</p>

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List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
Nil					
PT Rigunas Agri Utama – Bungo Tebo POM has established since 1985 and has planting palm oil since 1994, 1995 and 1996. Currently the palm oil has been replanting since 2016 and finished in 2019.					

Previous land owner / user comment	
	Feedbacks: Nil
	Audit Team verification and response: Nil

3.5 Impartiality and conflict of interest

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

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Formal Signing-off of Assessment Conclusion and Recommendation

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

Report prepared by	Acceptance of Assessment Conclusion
Name: Mujinius Jalaraya	Name: Putu Grhyate Yonata Aksa
Company Name: BSI Services Malaysia Sdn. Bhd	Company Name: PT Rigunas Agro Utama – Bungo Tebo POM
Title: Lead Auditor	Title: Sustainability Operation
Signature: 	Signature:  <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i>
Date: 14/03/2022	Date: 21/03/2022

Appendix A: Summary of Findings

Criterion / Indicator	Assessment Findings	Compliance	
<p>Principle 1: Behave ethically and transparently</p>			
<p>Drive ethical business behaviour, build trust and transparency with stakeholders to ensure strong and healthy relationships.</p>			
<p>Criteria 1.1: The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.</p>			
<p>1.1.1</p>	<p>(C) Management documents that are specified in the RSPO P&C are made publicly available.</p>	<p>Company has a list for document publicly available. As per <i>“Daftar Dokumen dan Informasi untuk Diakses Publik PT Rigunas Agri Utama”</i> dated 10 September 2019; last review on 2021. There are 22 type of documents, such as:</p> <ol style="list-style-type: none"> 1. AMDAL 2. Laporan RKL-RPL 3. Social Impact Assessment 4. HCV Identification 5. Locations permit, Land licensing (Location permit, principle permit, IPKH, HGU Certificate) 6. IMB – Izin Mendirikan Bangunan; Building Permit 7. Environmental licensing including Pollution prevention and reduction management plans 8. Licensing Machinery Factory - Perizinan Mesin-Mesin Pabrik 9. Realization and Program P2K3 Report - Laporan Pelaksanaan P2K3 10. LPUP (Laporan Perkembangan Usaha Perkebunan) PT Rigunas Agri Utama both of Inti and Plasma 11. Document of Conservation of Management Plan 12. Environmental Management Plan 	<p>Complied</p>

		<p>13. CSR Management Plan 14. FFB Pricing 15. Land Burn Report Land Burn Report 16. Procedure of Complaint and also Employee complaint logbook and stakeholder complaint. 17. Recording of deliberation process and results of compensation 18. Public Summary Report RSPO from CB 19. Continuous improvement program 20. Organisation Policy including human right policy 21. Document of Procedure 22. Employment report</p> <p>The certification holder has list of stakeholders and maintain as well, the latest update on September 2021.</p> <p>Scheme smallholders</p> <p>The list of information that can be access by relevant stakeholders in cooperative/KUD available under "List Dokumen dan Informasi untuk Diakses Publik Koperasi Unit Sawit Sumay Makmur", Informasi yang Bisa Diakses Publik Koperasi Belarik Jaya" and "List Dokumen dan Informasi untuk Diakses Publik Koperasi Tambara Jaya" revised in January 2021, such as:</p> <ol style="list-style-type: none"> 1. "Akte Pendirian Koperasi" – Cooperative establishment deeds; 2. Social Impact Assessment; 3. "Buku RAT" – Annual cooperative meeting records; 4. "Identifikasi HCV" – HCV identification; 5. "Sertifikat tanah (SHM)" – smallholder land certificate; 6. "SOP agronomi" – Standard Operating Procedure for Agronomy ; 7. "IMB" – Building permit; 	
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		<ul style="list-style-type: none"> 8. "Pelaksanaan K3" – health and safety policy and implementation; 9. "Dokumen CSR" – Cooperative Social Responsibility document; 10. "Pajak dan retribusi" – tax and retribution record; 11. "Kebijakan Koperasi" – Cooperative Policy Book; 12. Public Summary Report from Certification Body; 13. "Identifikasi dan Pengurangan Sumber Polusi" – Identification of pollution source and Pollution reduction plan; 14. "Logbook Keluhan" – Complaint logbook; 15. "Mekanisme penanganan konflik area plasma" – Mechanism for conflict resolution in smallholder area; 16. "Mekanisme keluhan, konsultasi dan komunikasi" – Mechanism for complaint, consultation and communication; 17. "Program Perbaikan Terus-menerus" – Continuous improvement program; 	
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders.	<p>PT Rigunas Agri Utama – Bungo Tebo POM and smallholder was provided an information in appropriate languages (Bahasa Indonesia) it can be understood and accessible by relevant stakeholders.</p> <p>Based on interview with surroundings stakeholder (e.g. Head of Village, government, union, gender committee and governmental department) can be understood of that list document.</p>	Complied
1.1.3	(C) Records of requests for information and responses are maintained.	<p>Bungo Tebo Estate and Mill</p> <p>Request Information and response from Stakeholder has been documented into a log book "Logbook Permintaan Informasi dan Respon Terhadap Permintaan Informasi PT. Rigunas Agri Utama Tahun 2021". For responses of information request from stakeholder, the company has established the procedure related to the information handling; Procedure No AA-GL-5009.1-R0 - Mechanism local communication/public consultation for interested parties. The procedure lines out that initial response will be given within 14 working</p>	Complied

		<p>days. Information request will then recorded into logbook by public relation officer. After fulfilment the records of information request will be kept for 3 years.</p> <p>For period January – September 2021, the register was recorded 15 information request and it’s responses, among others:</p> <ul style="list-style-type: none"> - Information inquiry – “Dinas Lingkungan Hidup Tebo Regency”, dated 21 October 2021. The information request is consist Hazardous Waste Report for 3rd quarter 2019 and has responded on 21 October 2021 by send the Report on 21 October 2021. - Data inquiry – from Environment Agency in Tebo Regency related to Report of Environmental Management Plan in January-June 2021”. PT RAU has reported the document on 3 August 2021. - Information required – from Agricultural Agency in Tebo Regency related to “Laporan Perkembangan Usaha Perkebunan” for 1st semester of 2021. PT RAU has responded by Group Manager on 5 August 2021. - Request for information from the District Environment and Transportation Office, letter no. 660/370/DLHP-II/2021 dated August 19, 2021 regarding invitations for exposure and follow-up on field results has been responded to on August 19, 2021. <p>Smallholder</p> <p>Cooperative have recorded the information request and their response in Logbook.</p> <ul style="list-style-type: none"> - KUD Sumay Jaya: recorded 3 information requests in 2021, all have been responded. For example: On 13 April 2021 from M. Amin (farmer) asking the application for heavy equipment to PT RAU for installation of culverts; responded by cooperative on 15 April 2021 stating cooperative will ask to PT. Rigunas Agri Utama and make an application for heavy equipment assistance. - KUD Tambara Jaya recorded 4 information requests in 2021, all have been 	
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		<p>responded. For example: On 4 September 2021 from Ridwan (farmer) asking if the POM opens on Sunday; Information request being conveyed to PT. Rigunas Agri Utama on same date – the response was the POM will be closed on Sunday.</p> <ul style="list-style-type: none"> - KUD Belarik Jaya recorded 4 information in 2021, all have been responded. For example: On 9 August 2021, Ebo (farmer) asking the current FFB price; Information request being conveyed to PT. Rigunas Agri Utama on same date – the response was FFB price at the day Rp. 2,636.77/kg for oil palm aged 21-25 years. - KUD Sawit Sumay Makmur recorded 4 information requests in 2021 and all have been responded. For example: On 23 June 2021 request from Sadikin (farmer), asking the preparation for fertilization in the second semester of 2021; a response from the SMM Cooperative that the preparation of the fertilizer material has been processed and is still being transported to PT RAU. 	
1.1.4	<p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official.</p>	<p>Bungo Tebo POM & Estate:</p> <p>Consultation and communication procedures which owned by Unit of Certification consist of several procedure, as below:</p> <ul style="list-style-type: none"> • Penanganan Permintaan Informasi Stakeholder (SOP AA-GL- 5008.1-R1, dated 22 Aug 2011). Which explains the company responses against all information request sent by stakeholders including response time of 14 working days after information request accepted • Penyampaian dan Penyelesaian Keluhan Karyawan (internal) SOP AA-HR-308.5-R1, dated 1 December 2019. Ensuring the anonymity profile. • Penanganan Keluhan Masyarakat (SOP AA-GL-510.1-R0, dated 1 Jan 2013. <p>PIC communication and consultation for Bungo Tebo Group (Mill, Estate and Smallholders) is Mr. Ahmad Bastari as nominated management official with letter Memorandum No. 037/HR-RO3/MEMO/11/2018 from Manager KLO</p>	Complied

		<p>dated 6 November 2018 related Reassignment of Bpk. Ahmad Bastari as Public Relations at PT Rigunas Agri Utama.</p> <p>Smallholders:</p> <p>Communication mechanism has been established and documented inside "Mekanisme Komunikasi, Konsultasi dan Keluhan". Stakeholder and/or smallholder farmer can write down in guest list and recorded in record book. Answer can be given by cooperative chairman or upon discussion for consensus.</p> <p>The decision was informed both verbal and in written to stakeholder and/or smallholder farmer. Administration officer from cooperative records down any decision being informed to stakeholder and/or smallholder member.</p> <p>Koperasi Tanjung Dani Sakti have "Kebijakan Koperasi Saeit Tambara Jaya" signed on 4 January 2021; the policy stipulates on point 15 "Menyediakan informasi yang memadai bagi para pihak sesuai dengan hukum yang berlaku tentang isu lingkungan, sosial, kesehatan dan keselamatan kerja" – to provide sufficient information for interested parties in line with legal requirements related to environment, social, occupational health and safety issues.</p> <p>KUD Sumber Usaha have "KUD Sumber Usaha" signed on 4 January 2021; the policy stipulates "Menyediakan informasi yang memadai bagi parapihak sesuai dengan hukum yang berlaku tentang isu lingkungan, sosial, kesehatan dan keselamatan kerja" – to provide sufficient information for interested parties in line with legal requirements related to environment, social, occupational health and safety issues.</p> <p>KUD Sumay Jaya have "KUD Sumay jaya" signed on 4 January 2021; the policy stipulates "Menyediakan informasi yang memadai bagi parapihak sesuai dengan hukum yang berlaku tentang isu lingkungan, sosial, kesehatan dan keselamatan kerja" – to provide sufficient information for interested parties in line with legal requirements related to environment, social, occupational health and safety issues.</p>	
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1.1.5	An up-to-date list of contacts and detailed stakeholder information is available along with designated representatives.	<p>BungoTebo POM and Estate, Scheme Smallholder:</p> <p>Stakeholder list of Bungo Tebo POM and Estate updated as of 15 September 2020. The List of stakeholders consists of several types of stakeholders based on regional levels: village, provincial and national districts, including NGO, for example: Sawit Watch and Greenpeace Southeast Asia.</p> <p>The list of stakeholders presented in detail about the address, name of person and phone number and also position and title, the list is including of Environment Agency of Tebo Regency, Labor Department of Tebo Regency, Village Head of Sumay Dusun Tanjung Dani, District Head of Serai Serumpun, Village Head of Sekutur Jaya, Village Head of of Teluk Singkawang and Village Head of Pulau Temiang.</p> <p>List of Stakeholders, updated in 15 September 2020, e.g:</p> <ul style="list-style-type: none"> • Government: Regent of Tebo; House of representative Tebo; Plantation, Livestock and Fisheries Office; Office of Cooperatives, Trade, Industry and Manpower, Environmental Service, BPJS Kesehatan Tebo Branch, BPJS Kenetagakerjaan, Tebo National Land Agency. • Public figure: District Head of Sumay, District Head of Serai Serumpun, Police office of Serai Serumpun, Police office of Sumay, Military office of Tebo Tengah, Danramil Tebo Ulu, Babinsa Desa Tuo Sumay, Puskesmas Sumay, Puskesmas Serai Serumpun, Lembaga Adat Tuo Sumay, Kades SP1- SP7, Kades Dusun Tuo, Kades Teriti, Kades Kandang, SPSI PT RAU. 	Complied
Criteria 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.	<p>Bungo Tebo POM and Estate:</p> <p>PT. Rigunas Agri Utama – Bungo Tebo POM has prepared a written policy to commit to a code of ethical conduct and integrity in all operation and transactions though Company Policy “Kebijakan Perusahaan”, signed by Managing Director on 1 December 2019. The policy mentioned company’s commitment to uphold and respect code of ethical conduct in all operation; “the company is committed to conducting ethical conduct in the business of all</p>	Complied

		<p>transactions and business operatives, throughout all forms of corruption, bribery and fraud in the use of funds and resources”.</p> <p>The policy has been disseminated to all workers on 14 July and 15 May 2020 and also to all stakeholder and contractors on 16 August 2020. The company policy is available on notice board. Based on interview with workers, during stakeholder consultation, it was noted that worker has a basic understanding of company policy related to code of ethical conduct.</p> <p>In the contractual agreement with the contractor, described in relation to business ethics measures including fraud, corruption, and conspiracy in the casual Employment Agreement, Article 13 on Manipulation / conspiracy, for example:</p> <ul style="list-style-type: none"> - Perjanjian Borongan – Employment Agreement No. 130/E3KBT/03/20 dated 1 March 2020 on behalf of A. Rahman for FFB transportation jobs. - Perjanjian Borongan – Employment Agreement No. 037/E3KBT/01/20 dated 2 January 2020 on behalf of Nurbaiti for transportation school bus. - Transport Agreement “Perjanjian Pengangkutan” No.154/ E3KBT/ 03/ 2021 dated 1 March 2021 between PT. Rigunas Agri Utama and Padli. Scope of work agreement: transportation of pebble/ rock, material, top soil for nursery, etc. - Work Agreement “Perjanjian Borongan” No.44/ E3KBT/ 01/ 2021 dated 1 January 2021 between PT. Rigunas Agri Utama and Dedi Saputra Siregar. Scope of work agreement: transportation of school children. <p>In 2021, PT. Rigunas Agri Utama made socialization of company policy for 9 harvesters, 8 upkeep workers and 10 fertilizer applicators in Bungo Tebo Estate, dated 2 September 2021.</p> <p>Scheme Smallholder:</p> <p>The smallholder scheme has set a policy for each cooperative. The cooperative has “Kebijakan Koperasi Sawit Sumay Makmur” signed 15 January 2021;</p>	
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		<p>“Kebijakan Koperasi Sawit Makmur” signed 15 January 2021; “Kebijakan Koperasi Belarik Jaya” signed 15 January 2021; “Kebijakan Koperasi Sawit Tambara Jaya” signed 15 January 2021; “Kebijakan Koperasi Sumay Jaya” signed 15 January 2021; “Kebijakan Koperasi Sumber Usaha” signed 15 January 2021; “Kebijakan Koperasi Tanjung Dani Sakti” signed 15 January 2021; These Cooperative Policy has established policies related to:</p> <ul style="list-style-type: none"> - Fulfilments of legal requirements that apply in the implementation of activities in cooperatives. - Ethical conduct in doing business in all business transactions and operations - Respect human rights by treating all KUD employees and farmers fairly. - Forbid child to work in every activity. - Prevent sexual harassment and various forms of violence against women. - Respect every KUD employee or farmer to form or become a member of a trade union and ensure the confidentiality of the reporter (Whistle-blower). - Respect human rights defenders (HRD) without giving threats and intimidation. - Do not provide work under threats, sanctions or penalties where workers do not have the freedom to agree to the implementation of the work. <p>Evidence seen:</p> <ul style="list-style-type: none"> • KUD Sumay Jaya Policy, which was published on 6 January 2020 and this policy has been socialized to all its members on 21 January 2020. • KUD Sumber Usaha Policy has set on 8 January 2020 and has been socialized to all its farmers’ member on 22 January 2020. • KUD Sawit Tambara Jaya Policy has set on 8 January 2020 and has been socialized to all its farmers’ member on 22 January 2020 • KUD Tanjung Aur Duri Policy has set on 7 January 2020 and has been socialized to all its farmers’ member on 23 January 2020. 	
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		<p>Minor Non-Conformities during remote audit:</p> <p>Some cooperation agreement documents i.e hazardous waste management and CPO and CPKO agreement do not explain about business ethics in accordance with RSPO requirements.</p> <p>Objective evidence:</p> <p>Based on review to these contracts, there is no specific article that describes the business ethics policy.</p> <p>Hazardous and Toxic Waste (LB3) Management Cooperation Agreement between Asian Agri Group Jambi and PT Shali Riau Lestari and PT Wastec International No. 118/SPK/AAG.JMB-SRL.WI/IV/2015 dated 18 April 2015.</p> <ul style="list-style-type: none"> • Hazardous and Toxic Waste (LB3) Management Cooperation Agreement between PT Rigunas Agri Utama – Bungo Tebo and PT Shali Riau Lestari No. 034/SRL-PKU/MOU/IV/2020 dated 1 April 2020. • Agreement of CPO and CPKO transportation between PT Rigunas Agri Utama and CV Teman Setia contract no. 01/X/TS-RAU/2019 and CV Jaya Pertama contract no. 01/VI/JP-RAU/ 2020. <p>Action taken to address the issue:</p> <p>PT. Rigunas Agri Utama demonstrated rectification in the contract for hazardous waste (LB3) management between Asian Agri Group Jambi and PT. Shali Riau Lestari and PT. Wastec International No. 18/SPK/AAG.JMB-SRL-WI/II/2021 dated 15 February 2021.</p> <ul style="list-style-type: none"> - Chapter 3 verse 4 stated all parties shall perform ethical conduct in implementation of the agreement. - Chapter 9 stipulates prohibit all kinds of manipulation, conspiracy, fraudulent behaviour, embezzlement, bribery (in form of financial, gift, hospitality, etc.) to put employee in due influence related to financial benefit or other benefit. 	
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		<p>PT. Rigunas Agri Utama demonstrated rectification in the contract for CPO and CPKO transport between PT. Rigunas Agri Utama and CV Teman Setia No.01/X/TS-RAU/2020 dated 1 December 2020.</p> <ul style="list-style-type: none"> - Chapter 7 Verse 3 stated all parties shall perform ethical conduct in implementation of the agreement. <p>PT. Rigunas Agri Utama demonstrated rectification in the contract for CPO and CPKO transport between PT. Rigunas Agri Utama and CV Jaya Pertama No.01-a/VI/TS-RAU/2020 dated 1 December 2020.</p> <ul style="list-style-type: none"> - Chapter 7 Verse 3 stated all parties shall perform ethical conduct in implementation of the agreement. 	
1.2.2	<p>A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.</p>	<p>Bungo Tebo POM, Estate and Smallholders:</p> <p>The Company Policy - "Kebijakan Perusahaan", signed by Managing Director on 1 December 2019 mentioned company's commitment to uphold and respect code of ethical conduct in all operation. The commitment including prevention of corruption, collusion and nepotism. The policy has been socialized to all workers on 14 July and 15 May 2020 and also to all stakeholder and contractors as well on 16 August 2020.</p> <p>In 2021, PT. Rigunas Agri Utama made socialization of company policy for 9 harvesters, 8 upkeep workers and 10 fertilizer applicators in Bungo Tebo Estate, dated 2 September 2021.</p> <p>The company policy is available on notice board, based on photos of the information board about the company policies that were shared at the time of this audit. The company also always disseminate business behaviour during morning briefing, spoken by foreman before doing the work.</p> <p>Minutes of Employment Payment (BAP: Berita Acara Pembayaran) Contractor is always done verification with realization on the fields is a function of control in terms of business ethics policy applied, taken sample: "Berita Acara dan Daftar Kemajuan Pekerjaan Bulanan" - Minutes of Monthly Job Progress and</p>	Complied

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		<p>List on contractor on behalf of A. Rahman (TBS transportation) on 1 September 2020.</p> <p>Monitoring school bus transport service through "Monitoring Kerja Bus Sekolah Kontraktor Dedi Saputra Siregar" period 1-30 September 2021 indicating 30 mandays delivered.</p> <p>Memorandum on payment No.008/OP-KBT/MEMO/09/21 dated 30 September 2021, indicating 30 mandays of service delivered, and payable for Rp. 9,555,000.</p> <p>"Pekerjaan Kontrak-Daftar Kemajuan Pembayaran Bulanan Periode 1-30 September 2021".</p> <p>Minutes of Payment "Berita Acara Pembayaran Hasil Kerja Kontraktor No.044/E3KBT/01/21" for Dedi Saputra Siregar for school bus service, period 1-30 September 2021. The number of mandays delivery consistent and approved by Group Manager.</p> <p>Monitoring FFB transport service through "Rekap angkut TBS Kontrak A Rahman" period 26 August-25 September 2021 indicating 523,370 kg FFB transported.</p> <p>Memorandum on payment No.009/OP-KBT/MEMO/09/21 dated 26 September 2021, indicating 523,370 kg FFB transported, and payable for Rp. 22,462,070.</p> <p>"Pekerjaan Kontrak-Daftar Kemajuan Pembayaran Bulanan Periode 26 Agustus-25 September 2021".</p> <p>Minutes of Payment "Berita Acara Pembayaran Hasil Kerja Kontraktor No.047/E3KBT/01/21" for A Rahman for FFB transport service, period 26 August-26 September 2021. The number of FFB transported consistent and approved by Group Manager.</p> <p>Monitoring FFB transport service through "Rekap angkut TBS Kontrak Padli" period 26 August-25 September 2021 indicating 344,000 kg FFB transported.</p> <p>Memorandum on payment No.009/OP-KBT/MEMO/09/21 dated 26 September 2021, indicating 344,000 kg FFB transported, and payable for Rp. 10,223,223.</p>	
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		<p>"Pekerjaan Kontrak-Daftar Kemajuan Pembayaran Bulanan Periode 26 Agustus-25 September 2021" indicating 344,000 kg FFB transported.</p> <p>Minutes of Payment "Berita Acara Pembayaran Hasil Kerja Kontraktor No.048/E3KBT/01/21" for Padli for FFB transport service, period 26 August-26 September 2021. The number of FFB transported consistent and approved by Group Manager.</p>	
<p>Principle 2: Operate legally and respect rights Implement legal requirements as the basic principles of operation in any jurisdiction.</p>			
<p>Criteria 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.</p>			
2.1.1	(C) The unit of certification complies to relevant regulations.	<p>Bungo Tebo POM, Estate and Smallholders:</p> <p>Written information on legal requirements for Estate and Smallholders are available in "Evaluasi Kepatuhan Hukum Tahun 2019-2020". Responsible person for updating legal register onsite is Public Relation and Sustainability Officer, under Law Compliance and Social, Security, License Department.</p> <p>The Company has reviewed several regulations on 1 July 2020 against regulations published in 2019-2020, while the list of regulations reviewed is as follows:</p> <p>A. Environmental aspect:</p> <ul style="list-style-type: none"> - PerMenLH No. 16 of 2019 The second amendment to the regulation of the minister of environment No. 5 of 2015 on Wastewater Quality Standards - PerMenLH No. 38 of 2019 challenges the types of business plans and/or activities that must have an analysis on environmental impacts. - PerMenLHK P.12/MENLHK/SETJEN/PLB.3/5/2020 on Hazardous and Toxic Waste Storage - UU No 17 Tahun 2019 about Water Resources <p>B. Employment aspect</p>	Complied

		<ul style="list-style-type: none"> - Decree of the Governor of Jambi No. 220/Kep.Gub/Disnakertrans regarding Minimum Wage year 2020 <p>C. Occupational Health & Safety Aspects</p> <ul style="list-style-type: none"> - PerMenaker No. 8 of 2020 regarding Safety and Occupational Health of Lifting Equipment <p>D. Aspect of Plantation / Cultivation / Palm Oil Mills</p> <ul style="list-style-type: none"> - Peraturan Menteri Perdagangan No. 05 of 2019 procedures for licensing the agricultural sector. <p>Latest update on 26 August 2021. Latest regulation listed in and evaluated:</p> <ul style="list-style-type: none"> - "Undang-undang No.11 tahun 2021 tentang Cipta Kerja" - "Peraturan Pemerintah No.35 tahun 2021 tentang Perjanjian Kerja Waktu Tertentu, Alih Daya, Waktu Kerja dan Waktu Istirahat dan Pemutusan Hubungan Kerja" - "Peraturan Pemerintah No.36 tahun 2021 tentang Pengupahan" - "Peraturan Pemerintah No.37 tahun 2021 tentang Penyelenggaraan Program Jaminan Kehilangan Pekerjaan" - "Peraturan Pemerintah No.44 tahun 2020 tentang Sistem Sertifikasi Perkebunan Kelapa Sawit Berkelanjutan" <p>Regulation from Ministry of Agriculture</p> <ul style="list-style-type: none"> - "Peraturan Menteri Pertanian No.18 tahun 2021 tentang Fasilitasi Pembangunan Kebun Masyarakat Sekitar" - This is fulfilled by proactive approach in supporting smallholder to prepare their "Tanah Kas Desa" for KKPA - "Peraturan Menteri Pertanian No.38 tahun 2020 tentang Penyelenggaraan Sertifikasi Perkebunan Kelapa Sawit Berkelanjutan Indonesia" - This is fulfilled with evidence ISPO certificate No.ISPO 619412. 	
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		<p>Regulation from Ministry of Environment and Forestry</p> <ul style="list-style-type: none"> - "Peraturan Menteri Lingkungan Hidup dan Kehutanan No.3 tahun 2021 tentang Standar Kegiatan Usaha pada Penyelenggaraan Perizinan Berusaha Berbasis Resiko Sektor Lingkungan Hidup dan Kehutanan" - This is completed with evidence: "Surat Izin Usaha Perdagangan No.SIUP.1358/09-01/PB/IX/91 PT. Rigunas Agri Utama" dated 3 September 1991 and "Nomor Induk Berusaha 8120200882091 PT. Rigunas Agri Utama" dated 29 August 2018 - "Peraturan Menteri Lingkungan Hidup dan Kehutanan No.4 tahun 2021 tentang Daftar Usaha dan/atau Kegiatan yang Wajib memiliki Analisis Mengenai Dampak Lingkungan Hidup, Upaya Pengelolaan Lingkungan Hidup dan Upaya Pemantauan Lingkungan Hidup atau Surat Pernyataan Kesanggupan Pengelolaan dan Pemantauan Lingkungan Hidup" 	
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>PT. Rigunas Agri Utama referred to "SOP Pemenuhan Peraturan Perundang-undangan dan Perubahannya No.AA-GL-5001.1-R0" dated 5 December 2009. The evaluation of laws and regulation mechanism:</p> <ul style="list-style-type: none"> - Law/ regulation owner will inform/announce of new laws/regulations. Information dissemination can be of different format. - PIC Law Compliance will extract and obtain hard copy/ soft copy of the new laws/ regulation. PIC Law Compliance shall perform socialization on the interpretation of new laws and regulation and the implementation for operational purposes. - Respective Department shall ensure the new laws/ regulations be implemented in form of review and revised policy/ procedure/ work instruction and communicating the changes to relevant parties. <p>Latest update on laws and regulation carried out 26 August 2021. Latest regulation listed in and evaluated see 2.1.1.</p>	Complied

<p>2.1.3</p>	<p>Legal or authorized boundaries are clearly demarcated and visibly maintained and there is no planting beyond these legal or authorized boundaries.</p>	<p>PT. Rigunas Agri Utama demonstrated the HGU boundaries are in place – based on map of “HGU No.43 Tahun 2016 Luas 134.02 Ha”</p> <ul style="list-style-type: none"> - BPN 32 (RAU 02⁶) in block A16i, bordering with Pinang Belai village, with moat; location 1⁰ 16’ 33.00” S and 102⁰ 22’ 12.33” E; - RAU 03⁶, in block A16i, bordering with Pinang Belai village, with moat; location 1⁰ 16’ 27.65” S and 102⁰ 22’ 0.59” E; - RAU 04⁶, in block A16g, bordering with Pinang Belai village, with moat; location 1⁰ 16’ 14.33” S and 102⁰ 21’ 46.16” E; - RAU 05⁶, in block A16f, bordering with Serai Serumpun village, with moat; location 1⁰ 15’ 50.90” S and 102⁰ 21’ 37.24” E; - RAU 06⁶, in block A16f, bordering with Serai Serumpun village, with moat; location 1⁰ 15’ 38.75” S and 102⁰ 21’ 40.65” E; - RAU 07⁶, in block A16a, bordering with Serai Serumpun village, with moat; location 1⁰ 15’ 13.97” S and 102⁰ 21’ 42.13” E; - BPN 04/RAU 01³, in block D08e, bordering with Pinang Belai village, with moat; location 1⁰ 17’ 22.55” S and 102⁰ 24’ 52.71” E; - RAU 02³, in block D08c, bordering with Pinang Belai village, with moat; location 1⁰ 17’ 25.29” S and 102⁰ 25’ 1.59” E; <p>There is no planting beyond the boundary pole because separated with deep moat.</p> <p>PT. Rigunas Agri Utama performs legal boundary monitoring and reported in</p> <ul style="list-style-type: none"> - “Laporan Pemeriksaan dan Perawatan Patok Batas HGU No.51/HGU/BPN/96 Luas 1,604.3 Ha” period 6 Juli 2021 for BPN 01 (RAU 07⁵), BPN 02 (RAU 06⁵), BPN 03 (RAU 03¹), BPN 06, BPN 19 (RAU 06²), BPN 23 (RAU 03²), BPN 24 (RAU 02²), BPN 26 (RAU 01²), BPN 28 (RAU 02¹), BPN 29 (RAU 01¹). 	<p>Complied</p>
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		<ul style="list-style-type: none"> - "Laporan Pemeriksaan dan Perawatan Patok Batas HGU No.51/HGU/BPN/96 Luas 1,047.35 Ha" period 6 Juli 2021 for BPN 32 (RAU 026), BPN 04 (RAU 013). - "Laporan Pemeriksaan dan Perawatan Patok Batas HGU No.39 Tahun 2016 Luas 133.71 Ha" period 6 Juli 2021 for RAU 01¹, RAU 02¹, RAU 03¹, RAU 04¹, RAU 05¹, RAU 06¹, RAU 07¹, RAU 08¹, RAU 09¹, RAU 10¹. - "Laporan Pemeriksaan dan Perawatan Patok Batas HGU No.40 Tahun 2016 Luas 133.71 Ha" period 6 Juli 2021 for RAU 01², RAU 02², RAU 03², RAU 04², RAU 05², RAU 06², RAU 07², RAU 08², RAU 09², RAU 10². - "Laporan Pemeriksaan dan Perawatan Patok Batas HGU No.41 Tahun 2016 Luas 103.97 Ha" period 6 Juli 2021 for RAU 01³, RAU 02³, RAU 03³, RAU 04³, RAU 05³, RAU 06³, RAU 07³, RAU 08³. - "Laporan Pemeriksaan dan Perawatan Patok Batas HGU No.42 Tahun 2016 Luas 74.14 Ha" period 6 Juli 2021 for RAU 01⁴, RAU 02⁴, RAU 03⁴, RAU 04⁴, RAU 05⁴, RAU 06⁴, RAU 07⁴, RAU 08⁴. - "Laporan Pemeriksaan dan Perawatan Patok Batas HGU No.43 Tahun 2016 Luas 134.02 Ha" period 6 Juli 2021 for RAU 01⁵, RAU 02⁵, RAU 03⁵, RAU 04⁵, RAU 05⁵, RAU 06⁵, RAU 07⁵, RAU 08⁵, RAU 09⁵. - "Laporan Pemeriksaan dan Perawatan Patok Batas HGU No.43 Tahun 2016 Luas 134.02 Ha" period 6 Juli 2021 for RAU 01⁶, RAU 02⁶, RAU 03⁶, RAU 04⁶, RAU 05⁶, RAU 06⁶, RAU 07⁶, RAU 08⁶. <p>Checking of nearest block location, division location, presence of boundary poles, paint condition, pole condition, area cleanliness. Boundary of land in smallholders are maintained KUD Sawit Sumay Makmur</p> <ul style="list-style-type: none"> - Smallholder No.426 Sumanto-Ginting/Bunyamin at location 1⁰ 18' 15.11" S and 102⁰ 23' 3.71" E; 1⁰ 18' 9.11" S and 102⁰ 23' 4.31" E; 1⁰ 18' 8.25" S and 102⁰ 23' 7.90" E; 1⁰ 18' 15.43" S and 102⁰ 23' 7.91" E; <p>KUD Tanjung Dani Sakti</p>	
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		<ul style="list-style-type: none"> - Smallholder No.642 Usman Jubai - Fiki at location 1° 18' 22.00" S and 102° 24' 5.81" E; 1° 18' 19.54" S and 102° 23' 55.24" E; 1° 18' 17.34" S and 102° 23' 59.24" E; 1° 18' 22.10" S and 102° 24' 11.48" E; <p>KUD Sumay Makmur</p> <ul style="list-style-type: none"> - Smallholder No.762 Basiroh-Kasiman at location 1° 15' 36.69" S and 102° 20' 43.99" E; 1° 15' 42.33" S and 102° 20' 43.99" E; 1° 15' 36.35" S and 102° 20' 39.02" E; - Smallholder No.775 Salamu - Kabul at location 1° 15' 43.49" S and 102° 21' 9.43" E; 1° 15' 42.44" S and 102° 21' 5.98" E; 1° 15' 36.75" S and 102° 21' 5.96" E; 1° 15' 36.67" S and 102° 21' 9.37" E; <p>KUD Sawit Tambara Jaya</p> <ul style="list-style-type: none"> - Smallholder No.2202 Sarmidi - Untung at location 1° 20' 3.60" S and 102° 28' 23.80" E; 1° 20' 8.93" S and 102° 28' 23.78" E; 1° 19' 57.98" S and 102° 28' 23.89" E; 	
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Criteria 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.

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2.2.1	A list of contracted parties is available.	<p>PT. Rigunas Agri utama – Bungo Tebo Group has had a list of contractors and maintained as well in the form of List of Contractors and FFB suppliers. Thera contractors on period January 2020 – October 2021, they are:</p> <table border="0"> <thead> <tr> <th>Contractor</th> <th>Jobs</th> </tr> </thead> <tbody> <tr> <td>A. Rahman</td> <td>FFB transporter, Tranport for Stone, EFB transporter</td> </tr> <tr> <td>Dedi Saputra Siregar</td> <td>Transport of School Students</td> </tr> <tr> <td>Dewi Sartika Pasaribu</td> <td>Transport of School Students</td> </tr> <tr> <td>Meinar Nurhayati Sitorus</td> <td>Transport of School Students</td> </tr> <tr> <td>Padli</td> <td>EFB Transport, FFB Transport</td> </tr> <tr> <td>CV Alam Cahaya Cemerlang</td> <td>Excavator Rental</td> </tr> <tr> <th>FFB Supplier</th> <th>Jobs</th> </tr> <tr> <td>Pedasan Jaya</td> <td>FFB Supplier to Bungo Tebo POM</td> </tr> <tr> <td>CV Asri Bersaudara</td> <td>FFB Supplier to Bungo Tebo POM</td> </tr> <tr> <td>SDR</td> <td>FFB Supplier to Bungo Tebo POM</td> </tr> <tr> <td>UD Royal</td> <td>FFB Supplier to Bungo Tebo POM</td> </tr> </tbody> </table>	Contractor	Jobs	A. Rahman	FFB transporter, Tranport for Stone, EFB transporter	Dedi Saputra Siregar	Transport of School Students	Dewi Sartika Pasaribu	Transport of School Students	Meinar Nurhayati Sitorus	Transport of School Students	Padli	EFB Transport, FFB Transport	CV Alam Cahaya Cemerlang	Excavator Rental	FFB Supplier	Jobs	Pedasan Jaya	FFB Supplier to Bungo Tebo POM	CV Asri Bersaudara	FFB Supplier to Bungo Tebo POM	SDR	FFB Supplier to Bungo Tebo POM	UD Royal	FFB Supplier to Bungo Tebo POM	Complied
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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>In the contract agreement with the local contractor, it describes compliance with the applicable regulatory and statutory requirements in Article 6, states that; The Second Party (Contractor) is obliged to follow the applicable government regulations in providing vehicles and drivers, including but not limited to manpower and tools to carry out work.</p> <p>As well as the attachment to the Work Agreement Letter, it is also mentioned in relation to regulatory and statutory requirements, labour, human rights, which are described in Chapter I. Specifications and Conditions of Work: Point 7: The second party (the Contractor) is obliged to comply with the applicable labor regulations, especially with regard to the payment of wages and the age</p>	Complied																								

		<p>of workers, namely over 18 (eighteen) years of age. As well as complying with the prohibition on the employment of children, forced labor and workers from human trafficking and must comply with the company's business ethics and comply with all certification requirements and standards.</p> <p>In the cooperation contract document with CPO contractors and CPKO, it is explained in the work contract related to compliance with legal requirements and not employing minors in Article 7: Responsibilities and Obligations, explained about the prohibition of employing children, complying with applicable regulations in Indonesia and applying wages in accordance with the rules and regulations.</p> <p>Several contractors who have collaborated with PT. Rigunas Agri Utama in the 2020 period, including:</p> <ul style="list-style-type: none"> - Statement and Guarantee letter "Pernyataan dan Jaminan Pemasok TBS UD Royal", signed by Yuzep Herman on 5 September 2018. - Statement and Guarantee letter "Pernyataan dan Jaminan Pemasok TBS PD Asan Jaya", signed by Riduan on 12 December 2018. 	
2.2.3	All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour.	<p>Bungo Tebo POM, Estate and Smallholder:</p> <p>In the cooperation contract agreement with the local contractor, it describes compliance with the applicable regulatory and statutory requirements in Article 6, states that; "The Second Party (Contractor) is obliged to follow the applicable government regulations in providing vehicles and drivers, including but not limited to manpower and tools to carry out work... " .</p> <p>As well as in the attachment to the Work Agreement, it is also mentioned in relation to regulatory and statutory requirements, employment, human rights, which are explained in Part I. Specifications and Conditions of Work: Point 7: "The second party (the Contractor) is obliged to comply with the applicable labor regulations, especially with the minimum wages and age of workers, shall over 18 (eighteen) years. Prohibition on child employment, forced labor and</p>	Complied

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		<p>workers from human trafficking and must comply with the company's business ethics and comply with all certification requirements and standards.</p> <p>The guarantee stipulated:</p> <ul style="list-style-type: none"> - Point 1, the FFB supplier will comply to requirement related to FFB supply, including providing GPS coordinates FFB source location; - Point 2, the FFB supplied has been under legal ownership as per regulation of land, plantation and other relevant regulation; - Point 3, FFB supplied is not coming from production upon forest area: Taman Nasional Tesso Nilo, Taman Nasional Bukit Tiga Puluh, Taman Nasional Bukit Kusuma, Kawasan Hutan Tanaman Industri, Kawasan Hutan Produksi Tetap, Kawasan Hutan Produksi Terbatas, Kawasan Hutan Produksi Konversi, Kawasan Konservasi; - Point 4, FFB supplied not bought from scheme smallholder - Point 6 and 7, FFB supplied is not stolen FFB. FFB supplied is not gathered from methods violating laws and regulations; - Point 8 and 9, FFB supplied is not coming from new development from forest conversion or peat land conversion after September 2014; - Point 10, FFB supplied is not coming from conflict land; - Point 12, FFB supplier is not employing child worker or under 18 years; - Point 13, FFB supplier is paying its worker minimum wage as per Upah Minimum Kabupaten or Upah Minimum Provinsi; 	
<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>PT. Rigunas Agri Utama – Bungo Tebo POM does not have direct sourced FFB supplier. The FFB supplier categorized as indirect sourced FFB supplier. Not applicable.</p>	<p>Not Applicable</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. 		
2.3.2	<p>For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in indicator 2.3.1.</p>	<p>Bungo Tebo POM and Estate</p> <p>PT. Rigunas Agri Utama – Bungo Tebo POM obtains indirect FFB supplies from third parties who have identified the source/origin of FFB using the geolocation. This FFB supplier is an indirect source (third party), however, company has carried out identification related to land ownership, trading business licensing and identifying the geolocation from which the FFB originates.</p> <p>PT. Rigunas Agri Utama send out questionnaire to Pedasan Jaya to get information on legality: has "Sertifikat Hak Milik"/ Land certificate, "seporadik" and other letter to demonstrate legal ownership of land; business permit: have SIUP, NPWP; plantation area zone: In Area Pemanfaatan Lain/APL – non forest area; minimum age: no worker under 18 years; and implementation of minimum wage: paid minimum wage. Questionnaire signed on 4 January 2021.</p> <p>PT. Rigunas Agri Utama send out questionnaire to UD Royal to get information on legality: has "Sertifikat Hak Milik"/ Land certificate, "seporadik" and other letter to demonstrate legal ownership of land; business permit: have SIUP, NPWP; plantation area zone: In Area Pemanfaatan Lain/APL – non forest area; minimum age: no worker under 18 years; and implementation of minimum wage: paid minimum wage from Jambi province. Questionnaire signed on 4 January 2021.</p> <p>"Data Petani Muara Tebo Supplier Pedasan Jaya" informed 19 outgrowers under the FFB supplier with 29 land parcels and total plantation source of 142 Ha. Sampled legal ownership of land for Ridwan (owns 40 Ha oil palm plantation):</p> <p>- "Sertipikat Hak Milik No.06.09.03.05.1.0945" dated 25 August 2018 based on mapping "Surat Ukur 0741/06090305/2018" dated 14 August 2018 of 2 Ha for Riduan. Geolocation X 221122 & 9853162.</p>	Complied

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		<p>- "Sertipikat Hak Milik No.06.09.03.05.1.0779" dated 31 July 2018 based on mapping "Surat Ukur 0682/6090305/2018" dated 23 July 2018 of 1.765 Ha for Riduan. Geolocation X 221122 & 9853162.</p> <p>- "Sertipikat Hak Milik No.06.09.03.05.1.0275" dated 20 June 2014 based on mapping "Surat Ukur 94/05/2014" dated 20 June 2014 of 1.226 Ha for Riduan. Geolocation X 221122 & 9853162.</p> <p>"Data Petani Muara Tebo Supplier UD Royal" informed 58 outgrowers under the FFB supplier consist of 72 land parcels and total plantation source of 642.8 Ha.</p> <p>Trading business permit "Surat Izin Usaha Perdagangan (SIUP) Kecil No.445/05-02/PK/XI/2012 untuk Perusahaan Royal", dated 12 November 2012; manager Yuzep Herman; address Jl. Batang Tebo No.129 blok D RT012/RW004, Kelurahan Cadika, Kecamatan Rimbo Tengah; business type trading oil palm FFB, rubber and transport service.</p> <p>Business registration "Tanda Daftar Perusahaan Royal No.059255202508" dated 12 November 2012; Manager Yuzef Herman, address Jl. Batang Tebo No.129 blok D RT012/RW004, Kelurahan Cadika, Kecamatan Rimbo Tengah.</p> <table border="1"> <thead> <tr> <th>Supplier</th> <th>Remarks</th> <th>Geolocations</th> </tr> </thead> <tbody> <tr> <td rowspan="2">UD Royal</td> <td>Kantor</td> <td>1° 23' 12.04" S & 102° 28' 32.74" E</td> </tr> <tr> <td>Abd Razak</td> <td>1° 22' 57.09" S & 102° 25' 22.18" E</td> </tr> <tr> <td rowspan="3">SDR</td> <td>Kantor</td> <td>1° 31' 08.34" S & 102° 30' 27.38" E</td> </tr> <tr> <td>Nanang Kukup</td> <td>1° 26' 26.97" S & 102° 40' 05.47" E</td> </tr> <tr> <td>Hadi</td> <td>1° 25' 30.32" S & 102° 29' 00.92" E</td> </tr> <tr> <td rowspan="2">Pedasan Jaya</td> <td>Kantor</td> <td>1° 18' 04.87" S & 102° 30' 31.26" E</td> </tr> <tr> <td>Ridwan</td> <td>1° 27' 39.44" S & 102° 26' 09.81" E</td> </tr> </tbody> </table> <p>OFI:</p>	Supplier	Remarks	Geolocations	UD Royal	Kantor	1° 23' 12.04" S & 102° 28' 32.74" E	Abd Razak	1° 22' 57.09" S & 102° 25' 22.18" E	SDR	Kantor	1° 31' 08.34" S & 102° 30' 27.38" E	Nanang Kukup	1° 26' 26.97" S & 102° 40' 05.47" E	Hadi	1° 25' 30.32" S & 102° 29' 00.92" E	Pedasan Jaya	Kantor	1° 18' 04.87" S & 102° 30' 31.26" E	Ridwan	1° 27' 39.44" S & 102° 26' 09.81" E	
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		PT. Rigunas Agri Utama – Bungo Tebo POM has progress the information of the indirect FFB supplier to Bungo Tebo POM. Certificate holder has to complete the information regarding geolocation of FFB origins, proof of ownership status, and if relevant valid planting/operational/trading license to allows buying and selling of FFB;			
<p>Principle 3: Optimise productivity, efficiency, positive impact and resilience Implement plans, procedures and systems for continuous improvement.</p>					
<p>Criteria 3.1: There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.</p>					
3.1.1	<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>Bungo Tebo POM and Estate: PT Rigunas Agri Utama has committed to economic and financial sustainability and has documented the working plan in the Financial Budget Plan “Rencana Kerja Perusahaan”. The company has set up a business management plan for the next 5 years and the forecast have been well documented in the document “Proyeksi Produk Sustainable & Non-Sustainable PT Rigunas Agri Utama Bungo Tebo” 2021 - 2025. Management plan was set up including FFB from scheme smallholder and independent FFB suppliers. Its management plan includes:</p> <ol style="list-style-type: none"> 1. FFB Production projection 2021 - 2025 2. CPO, PK, production projection 2021 - 2025 3. OER, KER projection 2021 - 2025 4. Estate Cost Estimation: Upkeep cost, manuring cost, pest and disease management cost, pruning cost, census cost, terrace maintenance cost, road and bridge maintenance cost, harvesting cost. 5. Mill Cost, KCP Cost, Selling cost, Bulking cost and Tax portion actual 2019 and projection 2021 – 2025. 6. Net Profit/Loss. <p>Below are crop projection Bungo Tebo Estate 2021 – 2025</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 50%; text-align: center;">Ha</td> <td style="width: 50%; text-align: center;">Estimated FFB Production (Ton)</td> </tr> </table>	Ha	Estimated FFB Production (Ton)	Complied
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3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available.	Replanting Program of PT Rigunas Agri Utama has been completed in 2019, at this moment the certificate holder does not have replanting program for short term.	Complied																																																						
3.1.3	The unit of certification holds management review at planned term according to the scale and nature of the activities undertaken.	<p>PT Rigunas Agri Utama has held management review on 19 May 2021. Management review attended by key personnel e.g. Technical Controller, Senior Manager, Mill Manager, Head Assistant, Assistant and Sustainability Staff. Management review has discussed all required agenda, such as:</p> <ul style="list-style-type: none"> a. Results of internal audits; Several PICs have been written in the Action Plan of sustainability internal audit, so that they can coordinate with various parties to carry out follow-up of non-conformities found during the internal audit; Gradually monitor the completeness of sustainability documents. b. Customer feedback; there was no complaint from customer regarding oil palm product delivered. c. Process performance and product conformity; Bungo Tebo POM and Estate has a regular schedule of engineering visit, agronomy visit and 	Complied																																																						

		<p>R&D visit.</p> <ul style="list-style-type: none"> d. Status of preventive and corrective actions; there is action plan that need to be follow up to the TC (Technical Controller) for approval of material purchase. e. Follow-up actions from management reviews; Monitor the road used by FFB, CPO and PK transporter to maintain the road condition; currently there is no trouble related to rad condition; Conduct joint meetings with estate and plasma management and establish action plan for repairing the main road. f. Changes that could affect the management system; there has been no change that could affect the management system. g. Improvement recommendations; modified the kernel delivery chute from straight to sloping; Establish a Training Refresh schedule once a year to improve Human Resources in document management. 	
<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>			
3.2.1	<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>The certificate holder regularly checks and review the performance of economic, social and environment, then develop and implement action plan for continuous improvement. Monitoring in Bungo Tebo Estate and POM are done by e.g. Visit Agronomy (VA) and Visit R&D and Visit Engineering (VE), verified data for example:</p> <ul style="list-style-type: none"> a. VA at Bungo Tebo Estate has conducted on 17 - 20 September 2020 by Goh Sudi Wunsen as per report VA-KBT-SEP-FULL-20-20 and R&D Visit on 21-23 September 2020 by Sahat M Sibuea as per Report VE-PBT-Sep-FULL-01-2020. For 2021, VA has conducted on 27 – 30 September 2021 by Subramaniam Perumal as per report VA/KBT/SEPT/FULL/01-2021. b. VE at Bungo Tebo POM has conducted on 21-23 September 2020 as per report No. VE-PBT-Sep-FULL-01-2020. For 2021, VE will be held in November 2021. 	Complied

		<p>Other record of continuous improvement is documented in AAIA (Asian Agri Innovation Award). Below are sample of Continuous Improvement (CI) recorded in AAIA:</p> <ul style="list-style-type: none"> - Fan as a tool of transferring EFB fiber to boiler to reduce the burning shell from 36.45% to 12.06% at Bungo Tebo POM. - The use of castration tools – “Almostra” to increase castration output in immature plant from 2.1 Ha/days to 2.5 Ha/days. “Almostra” is modification from “dodos/chisel”, almostra can made in estate workshop because it is relatively simple. 	
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.	RSPO Annual Communication of Progress 2019 of PT Inti Indosawit Subur has been available in RSPO website under membership number 1-0022-06-000-00. RSPO Metrics Template has been shown and verified during audit.	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>Bungo Tebo POM and Estate:</p> <p>PT Rigunas Agri Utama has procedures for estate best agriculture practice, starting from land preparation up to replanting, as follows:</p> <ol style="list-style-type: none"> 1. SOP AA-APM-OP-1100.01-R4 dated 5/09/2016 Nursery. 2. SOP AA-APM-OP-1100.02-R3 10/06/2015 New Planting. 3. SOP AA-APM-OP-1100.03-R2 24/07/2015 Road and Bridge Construction and Maintenance explains road and bridge construction and maintenance. 4. SOP AA-APM-OP-1100.04-R3 07/12/2015 Drainage Construction and Maintenance explains culvert/drainage construction and maintenance. 5. SOP AA-APM-OP-1100.05-R3 23/11/2016 Soil & Water Conservation. 6. SOP AA-APM-OP-1100.06-R5 16/02/2017 Planting cover crops. 7. SOP AA-APM-OP-1100.07-R6 16/02/2017, Oil Palm Planting. 	Complied

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		<ol style="list-style-type: none"> 8. SOP AA-APM-OP-1100.08-R6 11/05/2016 Weed control. 9. SOP AA-APM-OP-1100.09. R6 12/06/2017 Fertilizer application. 10. SOP AA-APM-OP-1100.10. R6 23/11/2016 Pests and Disease Control. 11. SOP AA-APM-OP-1100.11. R1 01/02/2009 Pesticide handling and Management. 12. SOP AA-APM-OP-1100.12. R3 23/11/2016 Castration explain cutting all generative product (male flower, female flower, all fruit, to support vegetative growth) – done 5-6 months before being harvested. 13. SOP AA-APM-OP-1100.13. R3 04/03/2016 Pruning. 14. SOP AA-APM-OP-1100.14. R3 16/02/2017 Census and Palm identification. 15. SOP AA-APM-OP-1100.15. R2 01/10/2010 Production census. 16. SOP AA-APM-OP-1100.16. R1 01/02/2009 Consolidation, Provision of support to fallen palm. 17. SOP AA-APM-OP-1100.17. R1 23/10/2014 Water management. 18. SOP AA-APM-OP-1100.18. R3 20/04/2015 Harvesting. 19. SOP AA-APM-OP-1100.19. R1 01/02/2009 FFB Transport. 20. SOP AA-APM-OP-1100.20-R6 16/02/2017 Replanting. <p>Procedures for mill best management practice has been established and documented as well, as follows:</p> <ol style="list-style-type: none"> 1. SOP AA-MPM-OP-1400.02.R2 FFB receiving station. 2. SOP AA-MPM-OP-1400.03.R1 Sterilizer station. 3. SOP AA-MPM-OP-1400.04.R1 Thresher station and loose fruit separation. 4. SOP AA-MPM-OP-1400.05-R1 Pressing station. 5. SOP AA-MPM-OP-1400.06-R1 Clarification station. 	
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		<ol style="list-style-type: none"> 6. SOP AA-MPM-OP-1400.07-R1 Nut and fiber separation. 7. SOP AA-MPM-OP-1400.08-R1 Kernel station. 8. SOP AA-MPM-OP-1400.09-R1 Boiler station. 9. SOP AA-MPM-OP-1400.10-R1 Engine room station. 10. SOP AA-MPM-OP-1400.11-R1 Water treatment station. 11. SOP AA-MPM-OP-1400.12-R1 Laboratorium. 12. SOP AA-MPM-OP-1400.13-R1 Palm oil mill effluent treatment. 13. SOP AA-MPM-OP-1400.14-R2 CPO and kernel bulking and dispatch operation. 14. SOP AA-MPM-OP-1400.15-R1 Preventive maintenance. <p>The mill operational procedures explain the flow process, specification of material and process, machinery and tools required, step-by-step process, control, monitoring and measurement and health and safety requirements.</p> <p>Scheme Smallholder:</p> <p>Kebun Plasma Bungo Tebo has established and maintained guidance to perform and monitor the best agriculture practices. The procedures were sighted, for example:</p> <ol style="list-style-type: none"> 1. SOP AA-Plasma-PP-KS-01; Nursery; dated 1 Sept 2011. 2. SOP AA-Plasma-PP-KS-02; Pest and Disease Control; dated 1 Sept 2011. 3. SOP AA-Plasma-PP-KS-03; Fertilizing; dated 1 Sept 2011. 4. SOP AA-Plasma-PP-KS-04; Harvesting; dated 1 Sept 2011. 5. SOP No.007/DOK/SOP/AA2016; Internal Communication Group Certification. 6. SOP No.013/DOK/SOP/AA/2016; Assessment and Inspection Member Group Plantation. 7. SOP No. 020/DOK/SOP/AA/2016; FFB Sale Mechanism. 	
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		<p>8. AA-SOP-06-KLO dated 1 February 2009; Weeds Control. Manager of Kebun Plasma Bungo Tebo in cooperation with Koperasi (Cooperative) has developed training programme for Good Agriculture Practise according to the procedure for smallholder.</p>	
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place.</p>	<p>To ensuring field implementation consistent with procedures, management has a mechanism such as:</p> <ul style="list-style-type: none"> • VA (Visit Agronomy) at Bungo Tebo Estate has conducted on 17 - 20 September 2020 by Goh Sudi Wunsen as per report VA-KBT-SEP-FULL-20-20 and R&D Visit on 21-23 September 2020 by Sahat M Sibuea as per Report VE-PBT-Sep-FULL-01-2020. For 2021, VA has conducted on 27 – 30 September 2021 by Subramaniam Perumal as per report VA/KBT/SEPT/FULL/01-2021. • VE (Visit Engineering) at Bungo Tebo POM has conducted on 21-23 September 2020 as per report No. VE-PBT-Sep-FULL-01-2020. For 2021, VE will be held in November 2021. • Annual Quality Control visit conducted by Quality Control Assistant. • Management Meeting. For example, there is a record of management meeting Bungo Tebo Estate on 19 May 2021 attended by technical controller, group manager, estate manager, field assistant and head clerk. <p>During the audit, auditor has interview QC staff for estate and mill. Through the interview obtain information as follows:</p> <ul style="list-style-type: none"> • QC in estate conducted regularly at least once a month. The items that shall verify is quality of harvesting (circle, harvesting path and FFB/loose fruit left), manuring, upkeep in immature area. Result of QC visit scale with 0 – 159 (poor), 160 – 180 (good) and 181 – 200 (excellence). Last report on September 2021 showed that Bungo Tebo Estate are in 'good' status. • QC in mill conducted regularly at least once a month (minimum 4 man days). Items to check such as quality of sortation in loading ramp, sterilizer, USB check, LTDS, wet shell, fibre cyclone, temperature in 	<p>Non-compliance</p>

		<p>clarification, kernel silo and press station, mass balance of solid and liquid and calibration of CPO/PK production in laboratory. Result of QC visit scale with 0 – 250 (poor), 251 – 320 (good) and 321 – 400 (excellence). Last report on September 2021 showed that Tebo POM is in 'good' status.</p> <p>Scheme Smallholder</p> <p>Based on interview with Plasma Manager as ICS Manager in coordination with board of KUD has set the monthly management meeting to discuss issues related to best management practices, social, occupational safety and health, environment and any other issues. The meeting also discussed the improvements that will be made in the future.</p>	
3.3.3	Records of monitoring and any actions taken are maintained and available.	<p>The certificate holder regularly checks and review the performance of economic, social and environment, then develop and implement action plan for continuous improvement. Monitoring in Bungo Tebo Estate and POM are done by e.g. Visit Agronomy (VA) and Visit R&D and Visit Engineering (VE), verified data for example:</p> <ul style="list-style-type: none"> a. VA at Bungo Tebo Estate has conducted on 17 - 20 September 2020 by Goh Sudi Wunsen as per report VA-KBT-SEP-FULL-20-20 and R&D Visit on 21-23 September 2020 by Sahat M Sibuea as per Report VE-PBT-Sep-FULL-01-2020. For 2021, VA has conducted on 27 – 30 September 2021 by Subramaniam Perumal as per report VA/KBT/SEPT/FULL/01-2021. b. VE at Bungo Tebo POM has conducted on 21-23 September 2020 as per report No. VE-PBT-Sep-FULL-01-2020. For 2021, VE will be held in November 2021. <p>Action plan for result of VA and VE at Bungo Tebo Estate and POM are available during audit.</p> <p>Non Conformity found during audit:</p> <p>It was found that Best Management Practices of palm oil plantation has not consistently implemented in several smallholder block according to procedure,</p>	Non-compliance

		<p>no monitoring and action taken to address the issue regarding Best Management Practices implementation.</p> <p>Based on field visit to smallholder member of Plasma Rigunas Agri Utama, it was found there are still lots of smallholder member plots that are not well maintained according to Best Management Practices procedures. Sample seen:</p> <ul style="list-style-type: none"> - KUD Sawit Sumay Makmur, member No.421 Yitno-Riyanto, No.425 Misdja-Kiki; KUD Tanjung Dani Sakti, member No.672 Anwar-Samhudi weeds condition uncontrol in their plots. - KUD Tanjung Dani Sakti, member No. 648 F Sianipar, No. 675 Sawal Pasaribu, weeds condition uncontrol in their plots - KUD Sumay Makmur, member No. 724 Komarudin, weeds condition are uncontrol - KUD Sawit Sumay Makmur KT 07, member No 430, Pak Jurianto: weeds condition are uncontrol - KUD Sawit Sumay Makmur, member No.421 Yitno-Riyanto, No.425 Misdja-Kiki; KUD Tanjung Dani Sakti, member No.672 Anwar-Samhudi condition of oil palm plantation is weed not controlled. 	
<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>			
<p>3.4.1</p>	<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>There is no new planting at PT Rigunas Agri Utama.</p> <p>Sighted documents of Social Environmental Impact Assessment (SEIA):</p> <ol style="list-style-type: none"> 1. The previous SEIA was "ANDAL (Analisa Dampak Lingkungan) & RKL-RPL (Rencana Pengelolaan Lingkungan – Rencana Pemantauan Lingkungan Rencana Pemantauan Lingkungan Perkebunan Kelapa Sawit Pola PIR-TRANS dan Pabrik Pengolahan Minyak Sawit PT Rigunas Agri Utama" datum 2003. The documents have been approved based on "Persetujuan Komisi AMDAL Propinsi Jambi No.273 Tahun 2003" dated 11th July 2003. 	<p>Complied</p>

		<p>2. Adendum AMDAL Rencana kegiatan Pembangunan Kernel Crushing Plant (KCP) dengan Kapasitas Produksi 200 ton/hari, Pembangunan Pembangkit Listrik Tenaga Biogas (PLTBG) yang dihasilkan Tenaga listrik Sebesar 3 MW dan Replanting Dengan Rencana Luas Lahan 2.506 ha di Kecamatan Sumay dan Kecamatan Serai Serumpun Kabupaten Tebo Provinsi Jambi Oleh PT Rigunas Agri Utama. Rencana Pengelolaan Lingkungan Hidup – Rencana Pemantauan Lingkungan Hidup (RKL– RPL)” regarding Development of Kernel Crushing Plant (KCP) with production capacity 200 ton/day, development of electricity power (PLTBG) that produced electricity 3 MW and replanting for 2,506 Ha. The documents have been approved based on Decree of Tebo Regent No.86 Year 2017” dated 2nd February 2017 regarding Environment Permit (Izin Lingkungan) and No.85 Year 2017 dated 2nd February 2017 regarding “Kelayakan Lingkungan”. This documents covers the area of 8,676 Ha (2,551 Ha planted for nucleus estate and 6,116 Ha planted for scheme smallholders), with palm oil mill capacity 60 tons FFB/hour, KCP 200 ton/day, electricity power 3 MW and 2,506 replanting area in the nucleus estate. The area of study covers Tuo SumaiVillage, Sungai Rambai Village, Pinang Belai Village (SP1), Sekuntum Jayo Village (SP2), Bukit Pemuatan Village (SP5) and Napal Putih Village (SP6) – Sumai sub-district, Tebo Regency, Jambi Province, year of study 2016.</p> <p>SEIA has been conducted independently and participatively by involving the affected stakeholders from Tuo SumaiVillage, Sungai Rambai Village, Pinang Belai Village (SP1), Sekuntum Jayo Village (SP2), Bukit Pemuatan Village (SP5) and Napal Putih Village (SP6) – Sumai sub-district, Tebo Regency, Jambi Province.</p> <p>All significant impacts have been identified i.e. reduction of soil and water quality, reduction of air quality, impact to socio-economic of local community, impact to occupational health and safety, work and road traffic accident, land fire, and disturbance of natural water balance. Plan to monitor and manage of each identified environment impact have been provided and documented.</p>	
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<p>3.4.2</p>	<p>For the unit of certification, a SEIA is available and social and environmental management plan and its monitoring have been developed with participation of affected stakeholders.</p>	<p>PT Rigunas Agri Utama has implemented environmental management system to manage impact from plantation and milling operations.</p> <p>The documents of "Rencana Kelola Lingkungan – Rencana Pemantauan Lingkungan" are available and in line with ANDAL document.</p> <p>The Social environmental management and monitoring plan (for significant impact) consisted of:</p> <ol style="list-style-type: none"> 1. Significant Impacts: Mobilization of heavy equipment and material during replanting; decrease of air quality; Program: air quality are maintained (parameter SO₂, CO, NO₂, O₃, HC, PM₁₀, PM_{2.5}) under standard based on PP No.41/1999 regarding Air Pollution Control. 2. Significant Impact: increase of noise level; Program: Decree of Minister of Environment No. KEP-48/MENLH/11/1996, regarding standard of noise level; 3. Significant Impact: decrease of community health; Program: increase community sanitary environment, clean and heathy attitude of community. 4. Significant Impacts: Soil erosion due to replanting activity; Program: <ul style="list-style-type: none"> - Make terrace in areas with a slope > 12° - Planting legume cover crop - Make a trench subside in lowland areas - Make a stop in the area of the bunch teresan - Making the hoof to areas with a slope < 12° <p>Both environmental management plan and its monitoring plan has been developed with participation of affected stakeholder in 6 villages from Tuo SumaiVillage, Sungai Rambai Village, Pinang Belai Village (SP1), Sekuntum Jayo Village (SP2), Bukit Pemuatan Village (SP5) and Napal Putih Village (SP6) – Sumai sub-district,. Evidence of participation and consultation can be shown in the SEIA document.</p>	<p>Complied</p>
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<p>3.4.3</p>	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in participatory way.</p>	<p>Social Environment management and monitoring plan as per RKL – RPL document has been implemented by PT Rigunas Agri Utama – Bungo Tebo POM. Based on verification on Environmental management and monitoring report “Laporan Pelaksanaan Izin Lingkungan” confirmed that the management and monitoring plan has been implemented accordingly. Data verified during audit :</p> <ul style="list-style-type: none"> • Air quality and noisy monitoring from FFB processing performed by emission measurement against Boiler and generator each semester, ambient air quality measurement each semester, noisy measurement (indoor and outdoor) each semester, odor measurement each semester. Latest monitoring and analysis on 14 – 17 April 2021 by PT ITEC Solution Indonesia, Analysis report number D.05.453/LHU/2021 shown that the air quality, Odor and noise are met with the quality standard/threshold PP RI No. 22 Tahun 2021, KepMenLH No. 48 Tahun 1996 and Permenakertrans No. 5 Tahun 2018. • Air emission quality monitoring for vehicle, genset and boiler has been conducted on 14 – 17 April 2021 by PT ITEC Solution Indonesia, Analysis report number D.05.453.i-UE.21 (Boiler 1 & 2), D.05.453.j-UE.21 (Genset 1), D.05.453.k-UE.21 (Genset 2 & Bibitan), shown that the air emission are met with the quality standard/threshold PerMenLH No. 07 tahun 2007 and PerMenLH No. 13 tahun 2009. • Surface water quality and water biota monitoring to prevent and control the physic and chemist quality of surface water comply to PP RI Nomor 22 tahun 2021. Perfomed by waste water quality monitoring each month, hazardous waste monitoring, land application monitoring, surface water quality monitoring each semester. Surface water quality monitoring and analysis in Sungai Lalo and Sungai Pamuatan by PT ITEC Solution Indonesia, Analysis report number dated 17 April 2021 shown that water quality has been met with the standard PP Nomor Nomor 22 tahun 2021. 	<p>Complied</p>
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		<ul style="list-style-type: none"> • Flora fauna monitoring performed by wildlife monitoring and monitoring the conservation area (HCV) each month. Monitoring Since January - June 2021 at Bungo Tebo Estate shown that there were found the presence of 1 species reptile, 10 species of bird and 3 species of mammal. • Community perception monitoring performed by community interview, employee data monitoring, interview with village head or public figure regarding their perception to company. Company has monitored the public perception through stakeholder meeting and questioner each year. Questioner to public perception regarding the impact of company presence has been disseminated to surrounding community. Latest monitoring of public perception has been performed in 11 – 19 May 2021, questioner of public perception can be demonstrated and well documented. Generally public perception was positive regarding the company presence and contribution to the surrounding community. <p>The implementation report has been evaluated and reviewed and reported to government agency per semester (six monthly).</p> <p>Social Environmental monitoring and management report reported in regular basis each semester in "Laporan Pelaksanaan RKL - RPL". Report semester I (Period January – June 2021) has been sent to the government on 2 August 2021 to Dinas Lingkungan Hidup Kab. Tebo & Dinas Perkebunan Kab Tebo), 3 August 2021 to Dinas Lingkungan Hidup Provinsi Jambi dan Kementrian Lingkungan Hidup dan Kehutanan (KLHK). Evidence of report submission can be shown as per "Daftar Distribusi Eksternal" and "Tanda terima Elektronik Sistem Informasi Pelaporan Elektronik Lingkungan Hidup (SIMPEL) to KLHK Number 1627974499-443.</p>	
<p>Criteria 3.5: A system for managing human resources is in place.</p>			
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>Bungo Tebo POM, Estate and Smallholders: Certificate holder PT Rigunas Agri Utama has established mechanism / procedure related to recruitment; SOP no. AA-HR-305-2-00 dated 1 February 2009 – Recruitment and Selection and the management of PT RAU (Group</p>	<p>Complied</p>

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		<p>Manager) also issued a Memorandum on September 1, 2020 No. 034/RAU/MEMO/IX/20 regarding Guidelines for the acceptance and appointment of employees of PT RAU Bungo Tebo Group, including explaining the determination of the maximum term of PKWT for 2 (two) years by considering evaluation of eligibility.</p> <p>This memorandum is effective from September 1, 2020 and this memorandum is also based on reference to Law no. 13 of 2002 concerning Manpower.</p> <p>The process of recruitment, selection and promotion was conducted transparently, and this was communicated to of candidates. Based on interview with management and document verification, confirmed that in period 2020, there is no process for recruitment. This also influence by Pandemic Covid-19 circumstances.</p> <p>To improve and develop the human resources/workers skill and capability, company provide the training programme based on training needs identification each year.</p> <p>The procedure regulated the retirement and termination. Retirement age determined as 56 years old; HR department will issued the decree letter of retirement for employee whose age 56 years old and the employee will receive the benefit of retirement. Termination of employment can be caused by disciplinary action and some of the following: the employee dies, the employee does not achieve the standard performance set by the company, the termination of the work agreement, retirement, and the existence of a court decision that has permanent legal force.</p> <p>Procedures for recruitment, selection, hiring, promotion, retirement and termination are also documented in Collective Labor Agreement "Perjanjian Kerja Bersama Periode 2018 – 2020". Collective Labor Agreement has been approved and registered by Dinas Tenaga Kerja dan Transmigrasi Kabupaten Tebo as per "Surat Direktur Persyaratan Kerja, Kesejahteraan dan Analisa Diskriminasi Dirjen Pembinaan Hubungan Industrial dan Jaminan Sosial</p>	
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		<p>Tenaga Kerja – Kementerian Tenaga Kerja RI No.56/BKS-PPS/2018 tentang Pendaftaran PKB antara BKS-PPS dengan PP.FSP.PP-SPSI” dated 7 July 2018. All procedure and Collective Labour agreement available in Bahasa Indonesia and has been communicated to all workers.</p>	
<p>3.5.2</p>	<p>Employment procedures are implemented and records are maintained.</p>	<p>Bungo Tebo POM, Estate and Smallholders: PT Rigunas Agri Utama has established mechanism / procedure related to recruitment; SOP no. AA-HR-305-2-00 dated 1 February 2009 – Recruitment and Selection and the management of PT RAU (Group Manager) also issued a Memorandum on 1 September 2020 No. 034/ RAU/MEMO/IX/20 regarding Guidelines for the acceptance and appointment of employees of PT RAU Bungo Tebo Group, including explaining the determination of the maximum term of PKWT for 2 (two) years by considering evaluation of eligibility. This memorandum is effective from 1 September 2020 and this memorandum is also based on reference to Law no. 13 of 2003 concerning Manpower. The process of recruitment, selection and promotion was conducted transparently, and this was communicated to of candidates. Based on interview with management and document verification, confirmed that in period 2021, there are 16 process for recruitment at Bungo Tebo Mill, while at the Bungo tebo Estate there is no process recruitment on period 2021. This also influence by Pandemic Covid-19 circumstances. Here are some samples of the recruitment process for the 2020-2021 period, for example: Recruitment in July 2021, on behalf of Rika Aprianti SE.. Application letter dated July 5, 2021 on behalf of Rika Aprianti SE. Along with the required documents including: KTP, Family Card, copy of S1 diploma and transcript. The interview process was held on 12 July 2021 and a health check was carried out by the Clinic on the Bungo Tebo Estate (dr. Yudi Chandra) and was declared healthy. PHL Work Agreement on behalf of Rika Aprianti dated July 28, 2021.</p>	<p>Complied</p>
<p>Criteria 3.6: An Occupational health and safety (H&S) plan is documented, effectively communicated and implemented.</p>			

<p>3.6.1</p>	<p>(C) All operational activities risks assessed to identify the H&S issues. Mitigation plans and procedures are documented and implemented.</p>	<p>PT Rigunas Agri Utama-Bungo Tebo Estate has prepared a procedure for risk assessment. The risk assessment method was calculating exposure x frequency x severity. Bungo Tebo Estate and Bungo Tebo POM have documented in form Hazard Identification Risk Assessment and Control (HIRAC), date of last review 18th January 2021. The risk acceptance level, have been established for each risk score tier.</p> <p>The risk assessment has covered for all activities in Estate and Mill, such as: land clearing, harvesting, FFB transport, manuring, spraying, weighbridge, grading FFB, sterilizer station, pressing station, engine, room, boiler station, workshop, office activities.</p> <p>The risk analysis and assessment has been performed according to company procedure "Prosedur Hazard Identification Risk Assessment & Document Control AA-SOP-HSE-03" dated 26/09/2018.</p> <p>Mitigation plan to reduce and minimize the risk impact has been develop by company covering:</p> <ul style="list-style-type: none"> • Elimination of risk • Subtitution of material and process • Engineering control • Administratif control • Personal protective equipment. <p>Engineering control was implemented to prevent hearing loss, e.g. install noise reduction agent and administrative by erected signboard of noise area, as described in Risk.</p> <p>Administratif control was performed by employee mutation/rotation, sanction for safety rules violation. Safety inspection was performed regularly to ensure the compliance of safety regulation.</p>	<p>Complied</p>
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		<p>Mitigation plan to reduce the hazard and risk impact also has been developed in "Program Manajemen K3 – PMKS Bungo Tebo & Kebun Bungo Tebo PT Rigunas Agri Utama Tahun 2021". OHS program for 2021, such as:</p> <ul style="list-style-type: none"> - Hazard and Risk identification and Analysis - Safety warning sign installation - Safety inspection and observation - Regular inspection of APAR and Hydrant including emergency equipment - PPE provision - OHS training for workers - Regular monitoring of OHS implementation including safety committee meeting - First aid training - First aid kit provision and monitoring <p>Implementation of the OHS programme can be demonstrated during audit. The OHS programme implementation progress are reported each quarter to Disnakertrans Provinsi Jambi, UPTD Muara Bungo</p> <p>Monitoring of the safety plan was conducted by regular safety meeting once in a month. Several action plans were raised for the unachieved safety targets and plans.</p> <p>Several Procedure to mitigate the risk and hazard has been develop by company:</p> <ul style="list-style-type: none"> - SOP Identifikasi Bahaya Penilaian Resiko dan Penentuan Pengendalian AA-SMK3-1101.02-R0 dated 1 May 2017 - SOP Investigasi Kecelakaan Kerja AA-SMK3-1101.01-R0 dated 1 May 2017 - SOP Kesiagaan Tanggap Darurat AA-EMS-820-PR dated 5 April 2017 - SOP Pengendalian Kebakaran Lahan AA-KL-14-EFP dated 5 May 2013, 	
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		<p>described the mechanism of handling fire.</p> <ul style="list-style-type: none"> - SOP Pengendalian Kebakaran di Pabrik, Kantor, dan Perumahan AA-KL-15-EFP dated 1 December 2010 - SOP Pengendalian Tumpahan B3 dan Limbah B3 AA-KL-16-EFP dated 1 December 2010 - SOP Pengendalian Tanggap Darurat Boiler AA-KL-17-EFP dated 1 December 2010 - SOP Pengendalian Gempa Bumi, Banjir, dan Tanah Longor AA-KL-18 - EFP dated 1 December 2010 - Accident and emergency procedures no. AA-EMS-446-PR (operation control), AA-EMS-447-PR (Emergency preparedness), AA-EMS-001-FM (Emergency plan), AA-EMS-003-FM (Emergency incident), and AA-EMS-004-FM (Emergency incident Reporting). - Job safety analysis for working in confined space (e.g. cleaning of storage tank), working at height, welding and other critical area. Work permit system and job safety analysis was established and implemented for these works. <p>Scheme Smallholder:</p> <p>Risk Assessment (HIRAC) for Smallholders cooperative made by cooperative secretary and assisted by the company. This risk assessment approved by Cooperative Chairman. Content of risk assessment are similar to all smallholders cooperative, where the main activities applied in smallholders blocks being consider within the risk assessment document. In example:</p> <ul style="list-style-type: none"> - HIRAC Koperasi Sumber Usaha, updated 2 January 2021 - HIRAC KUD Sawit Tambara Jaya, updated 2 January 2021 - HIRAC KUD Sawit Makmur, updated 2 January 2021 - HIRAC KUD Sumay Jaya, updated 2 January 2021 	
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		<ul style="list-style-type: none"> - HIRAC KUD Tanjung Aur Duri, updated 2 January 2021 - HIRAC KUD Tanjung Dani Sakti, updated 2 January 2021 - HIRAC KUD Sawit Sumay Makmur, updated 2 January 2021 - HIRAC KUD Belarik Jaya, updated 2 January 2021 <p>Activities coverage on HIRAC for Smallholders are FFB loading at blocks and unloading FFB's at Mill; Applying Fertilizer at blocks; Applying herbicides (by spraying team); Harvesting and Pest Control (particularly Elephant disruption).</p>	
3.6.2	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.</p>	<p>H&S Plan addressing health and safety risk of people are monitored as below:</p> <ul style="list-style-type: none"> - PPE usage monitoring: PPE monitoring performed in daily basis by each department. PPE monitoring present in "Checklist Penggunaan APD". PPE monitoring period 2020 and 2021 can be demonstrated during audit. - OHS inspection conducted each month by OHS expert and team each month. OHS inspection covering: PPE usage inspection, unsafe action and unsafe condition in area of: Workshop, harvesting, spraying working, manuring, housing. OHS inspection schedule 2021 were sighted. - Safety committee (P2K3) meeting to discuss the OHS plan implementation and performance are conducted each month. Sample seen: Bungo Tebo P2K3 meeting on September 13, 2021 discussed the follow-up to the previous P2K3 meeting, reviews of the use of personal protective equipment, reviews of OHS performance and work accidents through LTI calculations, reviews of disease reports from clinics. Minutes of P2K3 meetings can be shown during the audit. P2K3 activity reports are reported quarterly by the company to the Jambi Province Manpower Office, UPTD Muara Bungo; sample seen for report Q2 (July – Sept) 2021 has been reported on 12 October 2021. Report receipt are available. - Medical checkup for wrokers. Special health checks have been carried out on workers using pesticides/herbicides. The health check includes: complete blood count, complete urine, liver function, kidney function, x-ray and spirometry. The examination was carried out in March 2021 by the 	Complied

		<p>Hospital Clinic laboratory in Jambi. Evidence of follow-up on the results of the health examination can be shown in the form of a referral letter for treatment to a hospital for employees who are indicated by work-related illnesses and evidence of employee treatment by a clinic/hospital.</p> <ul style="list-style-type: none"> - Emergency equipment check, conducted each month to ensure the proper function of emergency equipment such as: APAR (Fire extinguisher), Hydrant, Water pump and its equipment, personal equipment for fire fighter. Latest monitoring conducted on September 2021. Evidence of monitoring can be shown during audit 	
<p>Criteria 3.7: All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.</p>			
<p>3.7.1</p>	<p>(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>	<p>Bungo Tebo POM and Estate: PT Rigunas Agri Utama has demonstrated the records of training program related to P&C RSPO under "Program Pelatihan Environmental and Sustainability year 2021" prepared by Training Center Asian Agri, Pekanbaru – based on competence mapping.</p> <p>Training program, such as:</p> <ul style="list-style-type: none"> - Sustainability Awareness (RSPO P&C, ISCC, ISPO); planned on November 2021 - HCV training; planned on February 2021 - Basic Safety – K3 training; planned on March 2021 - Basic Fire training; planned on July 2021 - First aider/"Pertolongan Pertama Gawat Darurat"; planned on November 2021 - Handling of hazardous waste and chemical material; planned on May 2021 - Safety Use Herbicide and Chemical; planned on October 2021 - Manuring training; planned on June 2021 - Pest and disease handling training; planned on June 2021 	<p>Complied</p>

		<ul style="list-style-type: none"> - Agronomy training; planned on June 2021. - Water operator training; planned on May 2021 - Boiler operator refreshment training; planned on December 2021 - Pesawat Angkat angkut Operator training; planned on July 2021 - Traceability and mass balance training; planned on March 2021 <p>This training program was delivered in January 2021 to all staff and employees of PT Rigunas Agri Utama including plasma-scheme smallholder and other out growers.</p> <p>Scheme Smallholder:</p> <p><u>KUD Belarik Jaya:</u></p> <p>Plasma management (scheme smallholder management) has develop the training and socialization program for KUD Belarik Jaya for period 2021, as below:</p> <ul style="list-style-type: none"> - Cooperative policy training, planned on 22 January 2021 - Pricing Mechanism socialization, planned on 7 January 2021 - OHS training and first aid, planned on 5 July 2021 - Harvesting training, planned on 18 February 2021 - Weeds control training, planned on 27 January 2021 - HCV training, planned on 20 May 2021 - Soil and water conservation, planed on 8 March 2021 - Basic fire training, planned on 7 Oct 2021 - Integrated pest management training, planned on 3 May 2021. <p><u>KUD Sawit Tambara Jaya:</u></p> <p>Plasma management (scheme smallholder management) has develop the training and socialization program for KUD Sawit Tambara Jaya as below:</p>	
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		<ul style="list-style-type: none"> - Cooperative policy training, planned on 28 January 2021 - Pricing Mechanism socialization, planned on 15 January 2021 - OHS training, planned on 5 July 2021 - AMDAL/Environmental impact analysis training, planned on 25 February 2021 - Harvesting training, planned on 11 February 2021 - Weeds control training, planned on 4 January 2021 - HCV training, planned on 20 May 2021 - First aid training, planned on 15 August 2021 - Basic fire training, planned on 7 Oct 2021 - Soil and Water conservation training, planned on 11 March 2021 - Integrated pest management training, planned on 10 May 2021. <p><u>KUD Sawit Sumay Makmur:</u></p> <ul style="list-style-type: none"> - Cooperative policy training, planned on 30 January 2021 - Pricing Mechanism socialization, planned on 16 January 2021 - OHS training, planned on 5 July 2021 - AMDAL/Environmental impact analysis training, planned on 27 February 2021 - Harvesting training, planned on 18 February 2021 - Weeds control training, planned on 18 January 2021 - HCV training, planned on 20 may 2021 - First aid training, planned on 4 August 2021 - Basic fire training, planned on 7 Oct 2021 - Soil and Water conservation training, planned on 7 March 2021 - Integrated pest management training, planned on 26 may 2021. <p><u>KUD Sumay Jaya:</u></p>	
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		<ul style="list-style-type: none"> - Cooperative policy training, planned on 21 January 2021 - Pricing Mechanism socialization, planned on 08 January 2021 - OHS training, planned on 5 July 2021 - AMDAL/Environmental impact analysis training, planned on 15 February 2021 - Harvesting training, planned on 4 February 2021 - Weeds control training, planned on 18 January 2021 - HCV training, planned on 20 May 2021 - First aid training, planned on 15 August 2021 - Basic fire training, planned on 5 July 2021 - Soil and Water conservation training, planned on 12 March 2021 - Integrated pest management training, planned on 3 May 2021. 	
3.7.2	Records of training are maintained, where appropriate on an individual basis.	<p>Bungo Tebo POM & Estate:</p> <p>Record of training implementation are well maintained, in the form of attendance list, minutes of training and photograph. With the Covid-19 outbreak in the 2020-2021 period, the training program has experienced problems with the implementation of social restrictions. Below are the training implementation 2021:</p> <ul style="list-style-type: none"> - Training of High Conservation Value performed on 15 February 2021 were attended by 8 participants - Basic Safety – K3 training, was performed on 6 June 2021 attended by 20 participants of Bungo Tebo Estate - Hazardous waste and chemical handling training on 12 January 2021 attended by 13 participants (Tim TUS and warehouse keeping) - Safety use Herbicides and Chemical refreshment training on 19 April 2021 and attended by 9 participants (Tim TUS and warehouse keeping) - Pest and disease handling training, dated 29 June 2020 by R&D team, 	Complied

		<p>attend by 6 Participant from HPT team.</p> <ul style="list-style-type: none"> - Training on the management and control of oil palm pests and diseases was held on March 19, 2021, attended by 17 participants <p>Record of training for each employee are available in Personal Data Training Employee 2021 period, sample seen:</p> <ul style="list-style-type: none"> - Employee on behalf Delyani (Sprayer Personnel) at Bungo Tebo Estate, training record: First Aid Training 13 November 2018, PPGD training on 21 may 2019, Sustainability awareness on 18 June 2019 and spraying training on 16 June 2020 - On behalf Suwanto (Mechanical Bungo Tebo POM), training record: Pelatihan penanganan B3 dan LB3 pada tanggal 18 April 2017, pelatihan penanganan B3 dan LB3 tanggal 13 maret 2018, pelatihan K3 pada tanggal 22 Oktober 2018, pelatihan basic fire pada tanggal 13 November 2018, pelatihan PPGD pada tanggal 21 Mei 2019, pelatihan penanganan B3 dan LB3 pada tanggal 12 Januari 2021. - On behalf Suswanto (Mechanic Bungo Tebo Estate), training record: hazardous waste and chemical material handling 18 Apr 2017, refreshment training hazardous waste and chemical material handling 13 Mar 2018, OHS training 22 Oct 2018, basic fire training 13 Nov 2018, First aid training 21 May 2019, refreshment training on chemical handling/hazardous waste 14 Jul 2020. <p>Scheme Smallholder: <u>KUD Belarik Jaya:</u> Plasma management (scheme smallholder management) has develop the training and socialization program for KUD Belarik Jaya for period 2021, as below:</p> <ul style="list-style-type: none"> - Cooperative policy training, planned on 22 January 2021 - Pricing Mechanism socialization, planned on 7 January 2021 	
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		<ul style="list-style-type: none"> - OHS training and first aid, planned on 5 July 2021 - Harvesting training, planned on 18 February 2021 - Weeds control training, planned on 27 January 2021 - HCV training, planned on 20 May 2021 - Soil and water conservation, planed on 8 March 2021 - Basic fire training, planned on 7 Oct 2021 - Integrated pest management training, planned on 3 May 2021. <p><u>KUD Sawit Tambara Jaya:</u> Plasma management (scheme smallholder management) has develop the training and socialization program for KUD Sawit Tambara Jaya as below:</p> <ul style="list-style-type: none"> - Cooperative policy training, planned on 28 January 2021 - Pricing Mechanism socialization, planned on 15 January 2021 - OHS training, planned on 5 July 2021 - AMDAL/Environmental impact analysis training, planned on 25 February 2021 - Harvesting training, planned on 11 February 2021 - Weeds control training, planned on 4 January 2021 - HCV training, planned on 20 May 2021 - First aid training, planned on 15 August 2021 - Basic fire training, planned on 7 Oct 2021 - Soil and Water conservation training, planned on 11 March 2021 - Integrated pest management training, planned on 10 May 2021. <p><u>KUD Sawit Sumay Makmur:</u></p> <ul style="list-style-type: none"> - Cooperative policy training, planned on 30 January 2021 	
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		<ul style="list-style-type: none"> - Pricing Mechanism socialization, planned on 16 January 2021 - OHS training, planned on 5 July 2021 - AMDAL/Environmental impact analysis training, planned on 27 February 2021 - Harvesting training, planned on 18 February 2021 - Weeds control training, planned on 18 January 2021 - HCV training, planned on 20 may 2021 - First aid training, planned on 4 August 2021 - Basic fire training, planned on 7 Oct 2021 - Soil and Water conservation training, planned on 7 March 2021 - Integrated pest management training, planned on 26 may 2021. <p><u>KUD Sumay Jaya:</u></p> <ul style="list-style-type: none"> - Cooperative policy training, planned on 21 January 2021 - Pricing Mechanism socialization, planned on 08 January 2021 - OHS training, planned on 5 July 2021 - AMDAL/Environmental impact analysis training, planned on 15 February 2021 - Harvesting training, planned on 4 February 2021 - Weeds control training, planned on 18 January 2021 - HCV training, planned on 20 may 2021 - First aid training, planned on 15 August 2021 - Basic fire training, planned on 5 July 2021 - Soil and Water conservation training, planned on 12 March 2021 - Integrated pest management training, planned on 3 May 2021. 	
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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 traceability and supply chains, Training Mass Balance carried out by PT. Rigunas Agri Utama – Bungo Tebo on 24 April 2021. The training provided by Mr. Defriwan. Training attended by Sofian B (KTU/Administration Assistant), Rico Santoso P (Sustainability Officer), Juprinal, Hesti Y, Sahrial Siregar, Halashon Purba (Mill Manager), Lusi Berifana.	Complied
Criteria 3.8: Supply chain requirements for mills.			
Procedure note: all requirements are classified as Critical Indicators . However it will not contribute to suspension if there is more than 5 non-compliance within a principle)			
3.8.1	Identity Preserved Module A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme. Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.	The certificate holder uses Mass Balance as the RSPO Supply Chain Module. This indicator is not applicable.	Not Applicable
3.8.2	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.	The certificate holder is a palm oil mill that uses RSPO supply chain model Mass Balance, therefore they can process FFB from certified and non-certified sources. The site aware that they can only claim their product (CPO and PK) as Mass Balance.	Complied

3.8.3	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p>	<p>The estimated annual tonnage for certified FFB processed, CPO and PK production are available in the Estate and Mill annual production budget for 12 months since last surveillance assessment. The FFB tonnage received from company-owned estates (Bungo Tebo Estate), scheme smallholders (Bungo Tebo Plasma) and third party supplier.</p> <p>The estimated for CPO and PK production from Bungo Tebo POM is recorded under the public summary report and on the RSPO certificate for PT. Rigunas Agri Utama – Bungo Tebo POM. The actual CPO and PK production were verified during each subsequent annual surveillance assessment visit to ensure that certified mill only deliver the allowed tonnage for the year.</p> <p>BSI Group as certification body has submitted estimated of FFB received, CPO and PK produced to RSPO Public Summary Report and the RSPO PalmTrace system.</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. Rigunas Agri Utama – Bungo Tebo Palm Oil Mill has been registered in RSPO IT Platform with registered ID number RSPO_PO1000002913.</p>	Complied
3.8.5	<p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ol style="list-style-type: none"> Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). Identification of the role of the person having overall responsibility for and authority over the implementation 	<p>During Recertification Assessment PT Rigunas Agri Utama - Bungo Tebo POM can demonstrates:</p> <ol style="list-style-type: none"> Standard Operating Procedures – Traceability (AA-MPM-OP-1400.17.R7) dated 1 October 2019. The procedures cover traceability of CPO and PK, since FFB receiving from Bungo Tebo Estate and Bungo Tebo Plasma, processing up to shipping of CPO and PK as well as daily production report. The procedure also regulates the internal audit by Sustainability Internal Audit Manager. Traceability records are to be kept for 10 years. Standard Operating Procedure – Book Keeping (AA-MPM-OP-1400.18- R4). The procedure explains method to check only certified product received. The book keeping mass balance stated every 3 months: January-March, April-June, July-September, and October-December each year. Head of 	Complied

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	<p>of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill's procedures for the implementation of this standard.</p> <p>d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill.</p>	<p>Environment and Sustainability will inform to Certification Body in the case of projected overproduction.</p> <p>3. Standard Operating Procedure – System RSPO PalmTrace (AA-SM-405- .2-R3) dated 1 January 2018. Described method to check certificate validity and how to make the Shipping Announcement, Confirmation, Trace and Remove in PalmTrace.</p> <p>4. SOP of Palm Oil Mill operation:</p> <ul style="list-style-type: none"> - SOP AA-MPM-OP-1400.02.R2, dated 1 September 2011, Stasiun Penerimaan (FFB Receiving Station) - SOP AA-MPM-OP-1400.03.R1, dated 1 February 2009, Stasiun Rebusan (Sterilizer) - SOP AA-MPM-OP-1400.04.R1, dated 1 February 2009, Stasiun Pemisahan Berondolan (Loose Fruit Separation) - SOP AA-MPM-OP-1400.05-R1, dated 1 February 2009, Stasiun Pengadukan dan Pengempaan (Pressing Station) - SOP AA-MPM-OP-1400.06-R1, dated 1 February 2009, Stasiun Pemurnian (Clarification) - SOP AA-MPM-OP-1400.07-R1, dated 1 February 2009, Stasiun Pemisahan Nut dan Fiber (Nut and Fiber separation) - SOP AA-MPM-OP-1400.08-R1, dated 1 February 2009, Stasiun Kernel (Kernel Station) - SOP AA-MPM-OP-1400.09-R1, dated 1 February 2009, Stasiun Boiler - SOP AA-MPM-OP-1400.10-R1, dated 1 February 2009, Stasiun Engine Room - SOP AA-MPM-OP-1400.11-R1, dated 1 February 2009, Stasiun Water Treatment - SOP AA-MPM-OP-1400.12-R1, dated 1 February 2009, Laboratorium - SOP AA-MPM-OP-1400.13-R1, dated 1 February 2009, Stasiun 	
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		<p>Pengelolaan Limbah (Palm Oil Mill Effluent Treatment)</p> <ul style="list-style-type: none"> - SOP AA-MPM-OP-1400.14-R2, dated 1 September 2011, Stasiun Penimbunan dan Pengiriman CPO dan Kernel (CPO and PK Storage and Despatch) - SOP AA-MPM-OP-1400.15-R1, dated 1 February 2009, Perawatan (Preventive Maintenance and Repair). <p>PT Rigunas Agri Utama – Bungo Tebo POM is able to demonstrate complete and up-to-date records and report demonstrating compliance with the supply chain’s general requirement and modular requirement, including training records.</p> <p>As per Procedure of Traceability (AA-MPM-OP-1400.17-R7), the responsible person in charge to the supply chain system is Mill/ Factory Manager and General Manager. During audit, the Mill Manager was able to demonstrate sufficient knowledge and understanding on RSPO supply chain implementation for Palm Oil Mill.</p> <p>Audit team sighted management letter “Memorandum Group Manager PT. Rigunas Agri Utama No.023/RAU/PBT/MEMO/10/21, Hal Penunjukan Saudara Sangal Leoward Butar Butar” dated 14 October 2021. The letter appointed mill manager as person in charge for operational and implementation of sustainability standard, including audit process.</p> <p>Bungo Tebo POM has SOP AA-MPM-OP-1400.02.R2, Stasiun Penerimaan (FFB Receiving Station) that described procedures for receiving and processing certified and non-certified FFB.</p>	
3.8.6	<p>Internal Audit</p> <ul style="list-style-type: none"> i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill; ii) Conforms to the requirements in the RSPO Supply Chain Certification Standard and the 	<p>As per Procedure of Traceability (AA-MPM-OP-1400.17-R7) chapter 6.7, Sustainability Internal Audit Manager conducted internal audit to ensure all operational and documentation activities are comply to the requirement in RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p>	Complied

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	<p>RSPO Market Communications and Claims Documents.</p> <p>iii) Effectively implements and maintains the standard requirements within its organisation.</p> <p>iv) 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>The site has conducted annual RSPO internal audit on 27-30 July 2020 using RSPO P&C Indonesia NI 2020 that contain RSPO Supply Chain Certification Standard. Status of corrective actions have been discussed in management review meeting. The most recent RSPO Management Review conducted by PT Rigunas Agri Utama – Bungo Tebo POM on 26 August 2020. Based on minutes of management review, the meeting has discussed:</p> <ul style="list-style-type: none"> - Results of internal audits; there was a non-conformity found during internal audit regarding document record. - Customer feedback; there was no complaint from customer regarding oil palm product delivered. - Process performance and product conformity; Bungo Tebo POM has a regular schedule of engineering visit and R&D visit. - Status of preventive and corrective actions; there is action plan that need to be follow up regarding process in mill. - Follow-up actions from management reviews; Monitor the road used by CPO and PK transporter to maintain the road condition; currently there is no trouble related to rad condition. - Changes that could affect the management system; there has been no change that could affect the management system. - Improvement Recommendations; modified the kernel delivery chute from straight to sloping. <p>PT. Rigunas Agri Utama – Bungo Tebo POM has conducted annual RSPO internal audit on 8-13 March 2021 using RSPO P&C Indonesia NI 2020 that contain RSPO Supply Chain Certification Standard in Criterion 3.8. Internal audit carried out by Hendryk Kristian Simanjuntak, Ridho Ilahi, Ian Septian Arifin, Wahyu Mulya Atmaja. Status of corrective actions have been discussed in management review meeting. The most recent RSPO Management Review conducted by PT. Rigunas Agri Utama – Bungo Tebo POM on 19 May 2021. Based on minutes of management review, the meeting has discussed:</p>	
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		<ul style="list-style-type: none"> - Results of internal audits: no finding related to RSPO SCCS for CPO mill; - Customer feedback: slippery road when hauling CSPO away from POM to road, to be maintained by Assistant traction; - Process performance and product conformity: Bungo Tebo POM has issues related to crowded queue FFB transport; - Status of preventive and corrective actions: there is action plan that need to be follow up regarding repair of loading hopper poles to improve process; - Follow-up actions from management reviews: no outstanding follow up from previous management review; - Changes that could affect the management system: there has been no change that could affect the management system; - Improvement Recommendations: Improve parking and queue position for FFB transporter; 	
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>Bungo Tebo POM received FFB from certified and non-certified source. Certified source consists of company own estate (Bungo Tebo Estate) and Scheme Smallholder (Bungo Tebo Plasma). Non-certified FFB sourced from third party supplier, consist of individual farmers and/or FFB collectors, e.g.: PD Asan Jaya, Pandawa 58, CV Asri Bersaudara, SDR, UD Royal.</p> <p>Document "Surat Pengantar TBS" (FFB Delivery Note) and Kartu Timbangan (Weighbridge Card) described identity and location of FFB source and other item required e.g.</p> <p>Certified FFB received:</p> <ul style="list-style-type: none"> - Weighbridge Ticket No. PBTA120203119 dated 05 Sep 2020, commodity: FFB Certified; source: Bungo Tebo Estate – Division I, Block A16a, amount: 852 bunch, Netto: 5,400 kg, RSPO Cert: RSPO 620917, transporter: internal, vehicle number: BH 5858 XX, driver: Abdul Malik, batch number: 13-100-71392019-41061147. - Weighbridge Ticket No. PBTA120203111 dated 05 Sep 2020, commodity: FFB 	Complied

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		<p>Certified; source: Bungo Tebo Estate – Division II, Block B17b, amount: 600 bunch, Netto: 3,140 kg, RSPO Cert: RSPO 620917, transporter: internal, vehicle number: BH 6849 ME, driver: Jumali, batch number: 13-100-71392019-41061127.</p> <ul style="list-style-type: none"> - Surat Pengantar TBS No. C.00422, dated 05 Sep 2020, FFB from Bungo Tebo Plasma; KT 31 (Harapan Baru) Desa Jati Belarik; YOP 1995/1996; Vehicle Number: BH 2726 YX; harvesting date 4 Sep 2020; Farmer name Basri; Plot No.2234; field weight 1,480 kg. - Weighbridge Ticket No. PBTA220104820 dated 5 Sep 2020, commodity: Sustainable FFB from Bungo Tebo Plasma; source: KT 31 (Harapan Baru); amount: 73 bunch, Netto: 1,581 kg, RSPO Cert: RSPO620917; transporter: Smallholder; vehicle number: BH 2726 YX, driver: Jayan, batch number: 13-100-34342019-41061020. - Surat Pengantar TBS No.00566; from PT. Rigunas Agri Utama Bungo Tebo Estate; date 12 June 2021; vehicle ID BH6328ME; FFB source Bungo Tebo Estate Division 1; planting year 2018; quantity 787 bunches. - Weighbridge ticket PBTA121203131; Certified FFB; RSPO620917; supplier Bungo Tebo Estate, Division I, block A18d and A18f; to PT. Rigunas Agri Utama Bungo Tebo POM; dated 12 June 2021; quantity 787 bunches – 3,810 kg; vehicle ID BH6328ME <p>Non Certified FFB received:</p> <ul style="list-style-type: none"> - Weighbridge Ticket No. PBTA520117333 dated 7 Sep 2020, commodity: third party FFB; source: FFB supplier SDR (ID ST00063); Net weight: 1,986 kg; transporter: general; vehicle number: BH 8124 WM, driver: Lawi. - Weighbridge Ticket No. PBTA520117324 dated 7 Sep 2020, commodity: third party FFB; source: FFB supplier PDASAN Jaya (ID ST00029); Net weight: 2,983 kg; transporter: general; vehicle number: BH 9581 CA, driver: Angga. - Surat Pengantar TBS; from UD Royal; to PT. Rigunas Agri Utama Bungo Tebo 	
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		<p>POM; date 2 October 2020; vehicle ID BH8140WM; FFB source Dusun Tuo; planting year 2000; quantity 148 bunches.</p> <ul style="list-style-type: none"> - Weighbridge ticket PBTA520118939; Outgrower FFB; supplier UD Royal; to PT. Rigunas Agri Utama Bungo Tebo POM; dated 2 October 2020; quantity 148 bunches – 2,066 kg; vehicle ID BH8140XM. - Surat Pengantar TBS; from PD Asan Jaya; to PT. Rigunas Agri Utama Bungo Tebo POM; date 26 March 2021; vehicle ID BH8057CU; FFB source Suo Suo village; planting year 2001; quantity 527 bunches. - Weighbridge ticket PBTA521103648; Outgrower FFB; supplier PD Asan Jaya; to PT. Rigunas Agri Utama Bungo Tebo POM; dated 26 March 2021; quantity 527 bunches – 7,904 kg; vehicle ID BH8057CU - Surat Pengantar TBS; from CV Asri Bersaudara; to PT. Rigunas Agri Utama Bungo Tebo POM; date 25 January 2021; vehicle ID BH8539WM; FFB source Simpang Niam; planting year 2000; quantity 443 bunches. - Weighbridge ticket PBTA521101131; Outgrower FFB; supplier CV Asri Bersaudara; to PT. Rigunas Agri Utama Bungo Tebo POM; dated 25 January 2021; quantity 493 bunches – 7,396 kg; vehicle ID BH8539WM <p>Laporan Harian Produksi (Daily Production Report) is document that mentioned and verified the tonnage of certified and non-certified FFB received. E.g. Daily Production Report dated 30 September 2020, mention that certified FFB received that day is 472,457 kg (consist 87,240 kg from Bungo Tebo Estate and 385,217 kg from Bungo Tebo Plasma); non-certified FFB received is 483,028 kg. For period January to September 2020, certified FFB received is 49,997,352 kg (18,355,482 from Bungo Tebo Estate and 31,641,870 kg from Bungo Tebo Plasma); non-certified FFB received is 84,055,107 kg.</p> <p>“Laporan Harian Produksi”/Daily Production Report dated 31 July 2021, mention that certified FFB received that day is 451,614 kg (consist 128,680 kg from Bungo Tebo Estate and 322,934 kg from Bungo Tebo Plasma/scheme smallholder); non-certified FFB received is 227,705 kg. For period January to July 2021, certified FFB received is 78,969,625 kg (20,288,023 from Bungo</p>	
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		<p>Tebo Estate and 58,681,602 kg from Bungo Tebo Plasma/scheme smallholder); non-certified FFB received is 50,293,001 kg.</p> <p>"Laporan Harian Produksi"/Daily Production Report dated 30 September 2021, mention that certified FFB received that day is 516,080 kg (consist 94,980 kg from Bungo Tebo Estate and 421,100 kg from Bungo Tebo Plasma/scheme smallholder); non-certified FFB received is 190,830 kg. For period January to September 2021, certified FFB received is 102,672,321 kg (25,967,603 from Bungo Tebo Estate and 76,704,718 kg from Bungo Tebo Plasma/scheme smallholder); non-certified FFB received is 62,903,694 kg.</p> <p>Head of Environment and Sustainability will inform to Certification Body in the case of projected overproduction.</p> <p>In the case on non-conforming raw material entering the process, Bungo Tebo POM has the mechanism to handle non-conforming material and/or document. Non-conforming material will be downgraded to non-certified material/product.</p>	
3.8.8	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ol style="list-style-type: none"> The name and address of the buyer; The name and address of the seller; The loading or shipment / delivery date; The date on which the documents were issued; RSPO certificate number; 	<p>PT. Rigunas Agri Utama - Bungo Tebo POM demonstrated SOP of Traceability (AA-MPM-OP-1400.7.R7). Chapter 6.2 indicates the Marketing Manager issued Delivery Order (DO) that contain information:</p> <p>Name and address of production unit; name and address of buyer; contract number, type of product transportation (air, land, sea); type of product CPO/PK certified or non-certified; quantity of product sold, CPO/PK certified or non-certified in MT; date of shipping; product quality specification CPKO (FFA, water content, dirt content) and Supply chain model (Mass Balance).</p> <p>At Bungo Tebo POM, weighbridge operator printed out CPO weighbridge ticket, based on DO from marketing indicates: Type of commodity; CPO certified or not-certified; country of origin: Indonesia; Supply Chain model: (Mass Balance); Certificate number of the POM; date of delivery, Product quality specification (moisture, FFA, dirt); Contract number/DO number; Quantity, Transport detail (driver name, vehicle number); Buyer address.</p> <p>Certified CPO delivered to PT Sari Dumai Sejati – Lubuk Gaung, whilst certified PK delivered to PT Rigunas Agri Utama – Bungo Tebo KCP. PT Sari Dumai Sejati</p>	Complied

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	<p>f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations);</p> <p>g) The quantity of the products delivered;</p> <p>h) Any related transport documentation;</p> <p>i) A unique identification number.</p>	<p>hold RSPO SCC certificate CU-RSPO SCC-821960, issued by Control Union; whilst PT Rigunas Agri Utama – Bungo Tebo KCP hold RSPO SCC certificate RSPO 661647 issued by BSI.</p> <p>Below are sample of sales document of RSPO certified CPO and PK:</p> <ul style="list-style-type: none"> - Sales Contract No. 09001/CC41/02/20 dated 4 Sep 2020; Seller is PT Rigunas Agri Utama – Bungo Tebo POM; Buyer is PT Sari Dumai Sejati – Lubuk Gaung; Commodity is RSPO certified CPO; Supply Chain Model is Mass Balance; Quantity is 300,000 kg; Supply Chain Certificate is RSPO 620917. - Delivery Order No. 09001/DC41/02/20; dated 4 Sep 2020; From: PT Rigunas Agri Utama – Bungo Tebo POM; to PT Sari Dumai Sejati – Lubuk Gaung; Commodity is RSPO certified CPO; Supply Chain Model is Mass Balance; Quantity is 300,000 kg; Supply Chain Certificate is RSPO 620917. - Weighbridge Card No. PBTC120100970 dated 11 Sep 2020; From: PT Rigunas Agri Utama – Bungo Tebo POM; to PT Sari Dumai Sejati – Lubuk Gaung. Delivery date is 11 Sep 2020; Commodity is RSPO Certified CPO; Supply Chain Model is Mass Balance; Quantity is 28,060 kg; based on DO No. 09001/DC41/02/20; Supply Chain Certificate number RSPO 620917; FFA: 2.72%; M&I: 0.190%; Seal number 5038410-5038417. <p>Sales Contract No. 04009/CC41/13/20 dated 27 Apr 2020; Seller is PT Rigunas Agri Utama – Bungo Tebo POM; Buyer is PT Sari Dumai Sejati – Lubuk Gaung; Commodity is RSPO certified PK; Supply Chain Model is Mass Balance; Quantity is 200,000 kg; Supply Chain Certificate is RSPO 620917.</p> <ul style="list-style-type: none"> - Delivery Order No. 04009/DC41/13/20; dated 27 Apr 2020; From: PT Rigunas Agri Utama – Bungo Tebo POM; to PT Sari Dumai Sejati – Lubuk Gaung KCP; Commodity is RSPO certified CPO; Supply Chain Model is Mass Balance; Quantity is 200,000 kg; Supply Chain Certificate is RSPO 620917. - Delivery Form No. KCP PBT 4106 SS dated 30 June 2020; from PT Rigunas Agri Utama – Bungo Tebo POM to PT Rigunas Agri Utama – Bungo Tebo 	
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		<p>KCP; product Palm Kernel; Supply Chain Model Mass Balance; Certificate N. RSPO 620917; quantity 325,300 kg.</p> <p>Sales Contract No. 10005/CC41/02/21 dated 8 October 2021; Seller is PT. Rigunas Agri Utama – Bungo Tebo POM; Buyer is PT. Sari Dumai Sejati – Lubuk Gaung; Commodity is RSPO certified CPO; Supply Chain Model is Mass Balance; Quantity is 200,000 kg; Supply Chain Certificate is RSPO 620917.</p> <ul style="list-style-type: none"> - Delivery Order No. 10005/DC41/02/21; dated 8 October 2021; From: PT. Rigunas Agri Utama – Bungo Tebo POM; to PT. Sari Dumai Sejati – Lubuk Gaung; Commodity is RSPO certified CPO; Supply Chain Model is Mass Balance; Quantity is 200,000 kg; Supply Chain Certificate is RSPO 620917. - Weighbridge Ticket No.PBTC121101187 dated 8 October 2021; from PT. Rigunas Agri Utama – Bungo Tebo POM to PT. Sari Dumai Sejati – Lubuk Gaung; product CPO Certified RSPO; Supply Chain Model Mass Balance; Certificate No. RSPO 620917; quantity 29,540 kg. <p>Minimum information have been available in the sales or delivery documents, e.g.:</p> <ul style="list-style-type: none"> - The name and address of the buyer; e.g. PT Sari Dumai Sejati – Lubuk Gaung. - The name and address of the seller; PT Rigunas Agri Utama – Bungo Tebo POM. - The loading or shipment / delivery date; e.g. 11 Sep 2020. - The date on which the documents were issued; e.g. 4 Sep 2020. - RSPO certificate number; RSPO 620917. - A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); Mass Balance. - The quantity of the products delivered; 28,060 kg. 	
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		<ul style="list-style-type: none"> - Any related transport documentation; - Weighbridge Card - A unique identification number; e.g. PBTC120100970. <p>Information are complete and presented in couple document, e.g. Sales Contract, Delivery Order and Weighbridge Card. Report of CPO and PK deliveries are documented in Daily Production Report and Monthly Production report.</p> <p>PT. Rigunas Agri Utama – Bungo Tebo POM has made Shipping Announcement in RSPO IT Platform for sales of RSPO certified CPO and PK per group of shipments (DO).</p>	
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>PT. Rigunas Agri Utama – Bungo Tebo POM does not outsources its milling activities.</p> <p>The Mill outsourced transport activity to independent third party and ensure that the third party complies with the RSPO Supply Chain Certification requirements.</p> <p>During transportation, PT. Rigunas Agri Utama – Bungo Tebo POM legally owned the CPO.</p> <p>Contract and control</p> <ul style="list-style-type: none"> - PT. Rigunas Agri Utama – Bungo Tebo POM has a contractual agreement with the transporter, CV Teman Setia, titled "Perjanjian Pengangkutan No.01/X/TS-RAU/2020" dated 1 December 2020; Chapter 7 verse "m" of the agreement sated that the contractor has to be complied with RSPO. - PT. Rigunas Agri Utama – Bungo Tebo POM has a contractual agreement with the transporter, CV Jaya Pertama, called "Perjanjian Pengangkutan No.01-1/VI/JP-RAU/2020 dated 1 December 2020; Chapter 7 verse "m" of the agreement sated that the contractor has to be complied with RSPO. <p>A documented control system for the outsourced process is described in SOP Traceability (AA-MPM-OP-1400.17-R7). The procedure has been communicated to outsourced transporter on 22 September 2020.</p>	Complied

	<p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</p>	Further socialization to transporter on 3 March 2021 to CV Jaya Pertama, attended by 5 drivers and representatives.	
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	<p>PT. Rigunas Agri Utama – Bungo Tebo POM has record the name and contact detail of all contractors as follow:</p> <ol style="list-style-type: none"> CV Teman Setia; Jl. Jend. Sudirman, Dusun VI, Kelurahan Sidomulyo, Kecamatan Pulo Bandring, Kisaran, Sumatera Utara Province; contact person: Mr. Rudy Hartono Salim, Mr. Amin. CV Jaya Pertama; Jl. Timor No 10, Medan 20235 and Jl. Jend. Sudirman, Dusun VI, Kelurahan Sidomulyo, Kecamatan Pulo Bandring, Kisaran, Sumatera Utara Province; contact Mr. Anwar, Mrs. Lie Kiem. 	Complied
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.	<p>PT. Rigunas Agri Utama – Bungo Tebo POM through Stakeholder Relation Officer – Jakarta Office aware to inform CB regarding the name and contact detail if there is new contractor. However, no new contractor.</p> <ol style="list-style-type: none"> CV Teman Setia; Jl. Jend. Sudirman, Dusun VI, Kelurahan Sidomulyo, Kecamatan Pulo Bandring, Kisaran, Sumatera Utara Province; contact person: Mr. Rudy Hartono Salim, Mr. Amin. CV Jaya Pertama; Jl. Timor No 10, Medan 20235 and Jl. Jend. Sudirman, Dusun VI, Kelurahan Sidomulyo, Kecamatan Pulo Bandring, Kisaran, Sumatera Utara Province; contact Mr. Anwar, Mrs. Lie Kiem. 	Complied
3.8.12	<p>Record keeping</p> <p>i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects</p>	Bungo Tebo POM can demonstrate complete, up-to-date and accessible records and reports covering all aspects of RSPO Supply Chain Certification Standard requirements. Records and report verified are as follows:	Complied

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	<p>of this RSPO Supply Chain Certification Standard requirements.</p> <p>ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.</p> <p>iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p>iv) For Mass Balance Module, the mill:</p> <p>a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</p> <p>b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock).</p>	<ul style="list-style-type: none"> - Laporan Harian Produksi (Daily Production Report) dated 30 September 2020, 31 December 2019, 1 July 2021 and 30 September 2021. - Monthly Production Report 2019, 2020 and 2021. - Kartu Timbangan (Weighbridge Card) PK. - Kartu Timbangan (Weighbridge Card) CPKO. - Delivery Order. - Sales Contract. <p>The procedure of Traceability (AA-MPM-OP-1400.7.R7), section C. 5.8 requires that all records and reports related to traceability and book keeping are retained for a period of 10 years. The site can demonstrate availability of records and reports during audit.</p> <p>Bungo Tebo POM recorded and balanced all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis. All volumes of certified CPO and PK delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. Bungo Tebo POM only deliver Mass Balance sales from a positive stock, the mill does not practiced sell short.</p>	
3.8.13	<p>Extraction Rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	<p>Oil Extraction Rate (OER) and Kernel Extraction Rate (KER) are applied to provide reliable estimation of CPO and PK produced.</p> <p>For year 2020, the budget for conversion from FFB into CPO (OER) is 20.06%, whilst budget for conversion from FFB into PK (KER) is 5.50%.</p> <p>For year 2021, the budget:</p> <ul style="list-style-type: none"> - FFB from Bungo Tebo Estate: 42,915,949 kg 	Complied

		<ul style="list-style-type: none"> - FFB from Bungo Tebo Smallholder: 69,960,594 kg - FFB from outgrowers/ third party supplier: 0 kg - CPO certified production: 9,312,762 kg - CPO non-certified production: 36,566,762 kg - CPO OER: 20.06% - PK certified production: 2,360,378 kg - PK non-certified production: 10,117,838 kg - PK OER: 5.5% 	
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 conversion ratio is monitored on daily basis through sounding result and documented in daily production report. Bungo Tebo POM is able to demonstrate the work instruction for analysis of oil content.</p> <p>Based on "Laporan Harian Produksi" (daily production report) dated 30 Sep 2020, the sounding result and production report shows that actual conversion ratios from FFB into CPO (OER) are:</p> <ul style="list-style-type: none"> • For FFB from own estate: 22.15% • For FFB from plasma: 20.49% • For FFB from third-party: 18.93% <p>And actual conversion ratios from FFB into PK are:</p> <ul style="list-style-type: none"> • For FFB from own estate: 5.28% • For FFB from plasma: 5.28% • For FFB from third-party: 5.28%. <p>Based on "Laporan Harian Produksi" (daily production report) dated 1 July 2021, the sounding result and production report shows that actual conversion ratios from FFB into CPO (OER) are:</p> <ul style="list-style-type: none"> • For FFB from own estate: 21.97% • For FFB from plasma: 20.87% 	Complied

		<ul style="list-style-type: none"> • For FFB from third-party: 19.28% <p>And actual conversion ratios from FFB into PK are:</p> <ul style="list-style-type: none"> • For FFB from own estate: 5.5% • For FFB from plasma: 5.5% • For FFB from third-party: 5.5%. <p>Based on "Laporan Harian Produksi" (daily production report) dated 30 September 2021, the sounding result and production report shows that actual conversion ratios from FFB into CPO (OER) are:</p> <ul style="list-style-type: none"> • For FFB from own estate: 20.88% • For FFB from plasma: 19.84% • For FFB from third-party: 18.33% <p>And actual conversion ratios from FFB into PK are:</p> <ul style="list-style-type: none"> • For FFB from own estate: 5.8% • For FFB from plasma: 5.8% • For FFB from third-party: 5.8%. 	
3.8.15	<p>Processing</p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	<p>Bungo Tebo POM uses Mass Balance model for implementation of the RSPO Supply Chain. This indicator is not applicable.</p>	Complied
3.8.16	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch</p>	<p>Bungo Tebo POM has done Shipping Announcement in RSPO IT Platform, for examples:</p> <ul style="list-style-type: none"> • Shipping Announcement, transaction ID TR-3fd3e789-8e16 dated 16/09/2020 for 140.77 MT CSPO Mass Balance; from PT Rigunas Agri Utama – Bungo Tebo POM as Seller to PT Sari Dumai Sejati (RSPO_PO1000006430). Confirmed by buyer on 16 September 2020. 	Complied

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	<p>date being the Bill of Lading or the dispatch documentation date.</p> <p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p>	<p>Transport detail: Sales Contract No. 09001/CC41/02/20 dated 4 September 2020; Delivery Order No. 09001/DC41/02/20; dated 4 September 2020; From: PT Rigunas Agri Utama – Bungo Tebo POM; to PT Sari Dumai Sejati – Lubuk Gaung; Commodity is RSPO certified CPO; Supply Chain Model is Mass Balance; Quantity is 300,000 kg; Supply Chain Certificate is RSPO 620917.</p> <ul style="list-style-type: none"> Shipping Announcement, transaction ID TR-e2aa96c1-ca59 dated 31/08/2020 for 200 MT CSPK Mass Balance; from PT Rigunas Agri Utama – Bungo Tebo POM as Seller to PT Sari Dumai Sejati (RSPO_PO1000000400). Confirmed by buyer on 11 September 2020. Transport detail: Sales Contract No. 04009/CC41/13/20 dated 27 April 2020; Delivery Order No. 04009/DC41/13/20; dated 27 April 2020; From: PT Rigunas Agri Utama – Bungo Tebo POM; to PT. Sari Dumai Sejati – Lubuk Gaung KCP; Commodity is RSPO certified CPO; Supply Chain Model is Mass Balance; Quantity is 200,000 kg; Supply Chain Certificate is RSPO 620917. Shipping Announcement, transaction ID TR-af6174cf-8c4b dated 14/08/2020 for 291.73 MT CSPK Mass Balance; from PT Rigunas Agri Utama – Bungo Tebo POM as Seller to PT Rigunas Agri Utama – Bungo Tebo KCP (RSPO_PO1000005127). Confirmed by buyer on 14 August 2020. Transport detail: Delivery Form No. KCP PBT 4106 SS dated 30 June 2020; from PT Rigunas Agri Utama – Bungo Tebo POM to PT Rigunas Agri Utama – Bungo Tebo KCP; product Palm Kernel; Supply Chain Model Mass Balance; Certificate No. RSPO 620917; quantity 325,300 kg. Shipping Announcement, transaction ID TR-d1cd62e7-0db5 dated 14 June 2021 for 433.24 MT CSPK Mass Balance; from PT. Rigunas Agri Utama – Bungo Tebo POM as Seller to PT. Rigunas Agri Utama – Bungo Tebo KCP (RSPO_PO1000005127). Confirmed by buyer on 14 June 2021. Transport detail: N/A; Commodity is RSPO certified CSPK; Supply Chain Model is Mass Balance; Quantity is 433.24 MT; Supply Chain Certificate is RSPO 620917. 	
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		<ul style="list-style-type: none"> • Shipping Announcement, transaction ID TR-62cf1760-99c7 dated 14/06/2021 for 533.29 MT CSPK Mass Balance; from PT. Rigunas Agri Utama – Bungo Tebo POM as Seller to PT. Rigunas Agri Utama – Bungo Tebo KCP (RSPO_PO1000005127). Confirmed by buyer on 14 June 2021. Transport detail: N/A; Commodity is RSPO certified CSPK; Supply Chain Model is Mass Balance; Quantity is 533.29 MT; Supply Chain Certificate is RSPO 620917. • Shipping Announcement, transaction ID TR-b07edec9-cec5 dated 31 March 2020 for 17.63 MT CSPO Mass Balance; from PT. Rigunas Agri Utama – Bungo Tebo POM as Seller to PT. Sari Dumai Sejati (RSPO_PO1000009992). Confirmed by buyer on 14 April 2020. Transport detail: Sales Contract No. 09001/CC41/02/20; Delivery Order No. 08307/DC41/02/18; From: PT. Rigunas Agri Utama – Bungo Tebo POM; to PT. Sari Dumai Sejati – Lubuk Gaung; Commodity is RSPO certified CPO; Supply Chain Model is Mass Balance; Quantity is 17.63 MT; Supply Chain Certificate is RSPO 620917. • Shipping Announcement, transaction ID TR-3fd3e789-8e16 dated 16 September 2020 for 140.77 MT CSPO Mass Balance; from PT. Rigunas Agri Utama – Bungo Tebo POM as Seller to PT. Sari Dumai Sejati (RSPO_PO1000009992). Confirmed by buyer on 16 September 2020. Transport detail: Sales Contract No. 09001/CC41/02/20; Delivery Order No. 09001/DC41/02/20; From: PT. Rigunas Agri Utama – Bungo Tebo POM; to PT. Sari Dumai Sejati – Lubuk Gaung; Commodity is RSPO certified CPO; Supply Chain Model is Mass Balance; Quantity is 140.77 MT; Supply Chain Certificate is RSPO 620917. • Shipping Announcement, transaction ID TR-11ba04d6-305e dated 18/02/2021 for 332.09 MT CSPO Mass Balance; from PT. Rigunas Agri Utama – Bungo Tebo POM as Seller to PT. Sari Dumai Sejati (RSPO_PO1000006430). Confirmed by buyer on 18/02/2021. Transport detail: Sales Contract No. 11003/CC41/02/20; Delivery Order No. 11003/DC41/02/20; From: PT. Rigunas Agri Utama – Bungo Tebo POM; to 	
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		<p>PT. Sari Dumai Sejati – Lubuk Gaung; Commodity is RSPO certified CPO; Supply Chain Model is Mass Balance; Quantity is 332.09 MT; Supply Chain Certificate is RSPO 620917.</p> <ul style="list-style-type: none"> • Shipping Announcement, transaction ID TR-7aefe1b4-3b74 dated 18 February 2021 for 80.33 MT CSPO Mass Balance; from PT. Rigunas Agri Utama – Bungo Tebo POM as Seller to PT. Sari Dumai Sejati (RSPO_PO1000006430). Confirmed by buyer on 18 February 2021. Transport detail: Sales Contract No. 12015/CC41/02/20; Delivery Order No. 12015/DC41/02/20; From: PT. Rigunas Agri Utama – Bungo Tebo POM; to PT. Sari Dumai Sejati – Lubuk Gaung; Commodity is RSPO certified CPO; Supply Chain Model is Mass Balance; Quantity is 80.33 MT; Supply Chain Certificate is RSPO 620917. • Shipping Announcement, transaction ID TR-2e9786c1-e302 dated 19 October 2021 for 329.3 MT CSPO Mass Balance; from PT. Rigunas Agri Utama – Bungo Tebo POM as Seller to PT. Sari Dumai Sejati (RSPO_PO1000006430). Confirmed by buyer on 19 October 2021. Transport detail: Sales Contract No. 09031/CC41/02/21 with Delivery Order No. 09031/DC41/02/21; and Sales Contract No. 09021/CC41/02/21 with Delivery Order No. 09021/DC41/02/21 From: PT. Rigunas Agri Utama – Bungo Tebo POM; to PT. Sari Dumai Sejati – Lubuk Gaung; Commodity is RSPO certified CPO; Supply Chain Model is Mass Balance; Quantity is 329.3 MT; Supply Chain Certificate is RSPO 620917. • Shipping Announcement, transaction ID TR-c90f431a-93f5 dated 19 October 2021 for 250.52 MT CSPO Mass Balance; from PT. Rigunas Agri Utama – Bungo Tebo POM as Seller to PT. Sari Dumai Sejati (RSPO_PO1000006430). Confirmed by buyer on 19 October 2021. Transport detail: Sales Contract No. 07019/CC41/02/21 with Delivery Order No. 07019/DC41/02/21; and Sales Contract No. 08017/CC41/02/21 with Delivery Order No. 08017/DC41/02/21 From: PT. Rigunas Agri Utama – Bungo Tebo POM; to PT. Sari Dumai Sejati – Lubuk Gaung; Commodity is 	
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		<p>RSPO certified CPO; Supply Chain Model is Mass Balance; Quantity is 250.52 MT; Supply Chain Certificate is RSPO 620917.</p> <p>For certified product which is sold under other scheme, Bungo Tebo POM has done Remove in RSPO IT Platform, for example:</p> <ul style="list-style-type: none"> • Stock Transaction ID ST-TR-6b7dc9e0-cf65 dated 20 October 2020; Product CSPO; Supply chain model Mass Balance; Available volume 26,665.37 MT; Volume to Remove: 14,013.71 MT; Stock Transaction Status: Removed From Certified Stock; Reason For Removal: Sold as ISCC. 	
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 Standard Operating Procedures – Traceability (AA-MPM-OP-1400.17.R7) dated 1 October 2019. PT Rigunas Agri Utama – Bungo Tebo POM delivered RSPO certified CPO and PK in bulk, the Mill has made no claim regarding the use of or support of RSPO certified oil palm products. Description of RSPO certified product only made in shipping documentation, e.g. Sales Contract, Delivery Order and Weighbridge Card.</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. Rigunas Agri Utama – Bungo Tebo POM is a subsidiary of RSPO registered member PT. Inti Indosawit Subur. The corporate communication of PT Inti Indosawit Subur can be seen in the company website, under brand Asian Agri at the address www.asianagri.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 • 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</p>	<p>Corporate communication in Asian Agri website, can be seen on https://www.asianagri.com/id/panel-keberlanjutan/standar-sertifikasi</p> <ol style="list-style-type: none"> Display its RSPO membership status: In the website of Asian Agri, it was stated the company is RSPO Member since February 2006. Display the RSPO web address: Not in direct manner. In Asian Agri website, company made a link to RSPO website. <p>State the member supports the work of the RSPO: Not in direct manner. In the website, Asian Agri wrote "In 2006, Asian Agri became a member of the</p>	Complied

	text 'Check our progress at www.rspo.org ' where the link must lead to the member's profile page.	Roundtable of Sustainable Palm Oil (RSPO), a global multi-stakeholder certification system to develop and implement global standards for sustainable palm oil production. We received our 1st RSPO certification for our estate in 2010, and in 2012, the certification for our smallholder scheme." d. State the member's history with regards to the RSPO: Complied. In the website of Asian Agri, it was stated the company is RSPO Member since February 2006. e. Use of RSPO Trademark to promote its membership of the RSPO: in the website, the company does not display RSPO Trademarks and corporate logo.	
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.	Yes. In the Asian Agri website, stated that the company is RSPO Member since February 2006. However, the statement are clear and did not mislead consumers or other stakeholders as to the certified content of oil palm products in their own 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.	Yes. In the Asian Agri website, stated that the company is RSPO Member since February 2006. However, the statement are clear and did not mislead consumers or other stakeholders as to the certified content of oil palm products in their 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, the Asian Agri website did not display the RSPO Corporate Logo. The certificate holder did not use any RSPO corporate logo in the letterheads or emails.	Not Applicable
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. Rigunas Agri Utama – Bungo Tebo POM stated in sales documents, e.g. Sales Contract, Delivery Order and Weighbridge Card that the product they sold/deliver is RSPO Certified CPO or PK model Mass Balance.	Complied

5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	It was verified that when selling certified oil palm product, PT. Rigunas Agri Utama – Bungo Tebo POM stated the supply chain model and certificate number, e.g. in Sales Contract, Delivery Order and Weighbridge Card.	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>	PT. Rigunas Agri Utama – Bungo Tebo POM is not a distributor or wholesaler. Not applicable.	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</p>	PT. Rigunas Agri Utama – Bungo Tebo POM is producing CPO and PK. The communication provided in the delivery documents has provided clear description of the products. There is no product labelling.	Not Applicable

	may be provided by a certified RSPO member without constituting a product-specific claim.		
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 made by the certificate holder. PT. Rigunas Agri Utama – Bungo Tebo POM is not using the product specific claim.	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 made by the certificate holder. PT. Rigunas Agri Utama – Bungo Tebo POM is not using the RSPO trademark and/or RSPO label.	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 made by the certificate holder. PT. Rigunas Agri Utama – Bungo Tebo POM is not using the RSPO trademark and/or RSPO on-pack claims.	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 made by the certificate holder. PT. Rigunas Agri Utama – Bungo Tebo POM is not using the RSPO trademark and/or RSPO on-pack claims stating their RSPO membership status.	Not Applicable
6.5	Members shall not communicate to consumers' information about their suppliers' RSPO membership status.	There is no business to consumer communication made by the certificate holder. PT. Rigunas Agri Utama – Bungo Tebo POM is not using the RSPO trademark and/or RSPO on-pack claims stating their supplier's RSPO membership status.	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 made by the certificate holder. PT. Rigunas Agri Utama – Bungo Tebo POM is not using the RSPO trademark and/or RSPO on-pack claims.	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 made by the certificate holder. PT. Rigunas Agri Utama – Bungo Tebo POM is not using the RSPO trademark and/or RSPO on-pack claims or any other logo.	Not Applicable
6.8	RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules applying to RSPO supply chain certified members. The guidance document for audits is available on www.rspo.org .	PT. Rigunas Agri Utama – Bungo Tebo POM is not retailers or food service company. Not applicable.	Not Applicable
MODULE B – MASS BALANCE SPECIFIC RULES			
Minimum Mass Balance content			
95% or above of the oil palm content must be RSPO MB-certified.		The MB volume that can be sold is only the certified CPO or PK produced from certified FFB. Hence the CSPO volume sold under MB model is considered 100% content.	Complied

<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 non-certified volume must be covered by equivalent volume of RSPO Credits.</p>	<p>The MB volume that can be sold is only the certified CPO or PK produced from certified FFB. Hence the CSPO volume sold under MB model is considered 100% content.</p>	<p>Complied</p>
<p>Labelling and trademark (MB)</p>		
<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> • Surrounded by the text: 'Certified sustainable palm oil'. • The RSPO label MUST contain the tag 'MIXED'. The tag MIXED designates oil palm products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag 'MIXED' on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim. • The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'. • Wherever the RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4 pt (1.4 mm or 0.06 inch). • In on-pack communications, the RSPO trademark can be printed anywhere on the pack. Further guidance on use of the trademark is provided in the RSPO Trademark License Terms and Conditions and in Annex 1 of the Rules on Market Communications & Claims document. 	<p>There is no labelling and trademarking used by PT. Rigunas Agri Utama - Bungo Tebo POM on their products.</p>	<p>Choose an item.</p>
<p>Messaging (MB)</p>		

<p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <ul style="list-style-type: none"> • [Oil palm products]/[palm oil]/[palm kernel oil] from RSPO-certified mills and plantations were mixed with non-certified oil palm products in the supply chain. • The volume of [oil palm products][palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations. <p>In off-product communications, reference to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown in company records is allowed.</p> <p>Messaging NOT ALLOWED in storytelling in product-related communications:</p> <ul style="list-style-type: none"> • Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product. 	<p>There is no messaging in stroytelling used by PT. Rigunas Agri Utama - Bungo Tebo POM on their products.</p>	<p>Complied</p>	
<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>Bungo Tebo Mill and Estate: The company has a corporate policy dated 2 March 2020 issued by Head of Operational PT Rigunas Agri Utama No.049/HO/MEMO/INT/03/20, related "Perlindungan terhadap pelapor/pembela hak asasi manusia dari tindakan balas dendam, intimidasi dan pelecehan" (Protection of Human Right Defender from revenge, intimidation and harrassment). The policy relating to human rights, is explained in point 13, states that: <i>"The company respects human rights by treating all employees fairly, both in terms of acceptance, valuation, conditions and working environment, as well as representation regardless of tribe, caste, national origin, religion/belief,</i></p>	<p>Complied</p>

		<p><i>disability, gender, sexual orientation, membership of trade union political affiliation and/or age".</i></p> <p>The policy has been continuously socialized to all workers on 21 September 2021 and 15 May 2020 and to all stakeholder and contractors as well on 16 August 2020.</p> <p>Scheme smallholder:</p> <p>The scheme smallholder has set a policy for each cooperative. This Cooperative Policy has established policies related to:</p> <ul style="list-style-type: none"> - Fulfilments of legal requirements that apply in the implementation of activities in cooperatives - Ethical conduct in doing business in all business transactions and operations - Respect human rights by treating all KUD employees and farmers fairly - Forbid minors to work in every activity - Prevent sexual harassment and various forms of violence against women - Respect every KUD employee or farmer to form or become a member of a trade union and ensure the confidentiality of the reporter (Whistle-blower) - Respect human rights defenders (HRD) without giving threats and intimidation - Do not provide work under threats, sanctions or penalties where workers do not have the freedom to agree to the implementation of the work. <p>The Sawit Sumay Makmur Cooperative Policy, which was published on 5 January 2021 and this policy has been socialized to all its members on 5 January 2021; Sawit Makmur Cooperative Policy has set on 5 January 2021 and has been socialized to all its farmers' member on 6 January 2021; Belarik Jaya Cooperative Policy has set on 4 January 2021 and has been socialized to</p>	
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		all its farmers' member on 4 January 2021; Sawit tambara Jaya Cooperative Policy has set on 4 January 2021 and has been socialized to all its farmers' member on 4 January 2021.	
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>There is no evidence that company is using mercenaries and or paramilitaries in operational activities of the company. Based on interview with stakeholders (i.e. government agency, head of village, workers & labor union) and also online search was revealed that company does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operational activities.</p> <p>Based on interviews with management (KTU) on behalf of Bpk. Sofyanto at Estate and Bpk. Soyfan Batara at Mill and also Bpk. Samsuardi at Plasma and several employees/workers of PT RAU, that there no mercenaries and paramilitaries use in the operations in PT RAU.</p> <p>Based on an interview with the Chair of the Labor Union and Gender Committee of PT RAU, that until the period of 2021 there were no cases or work practices with violence or threats against workers.</p>	Complied
Criteria 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.			
4.2.1	(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.	<p>Bungo Tebo Estate, Mill and Smallholder:</p> <p>Company has a mechanism to handle complaint from external party according to "Prosedur Penanganan Keluhan, Dokumen No. SOP AA-GL-5005-R0 01".</p> <p>Complaints from internal stakeholders are managed through "Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan, Dokumen No.SOP.AA-HR-308 0.5-R0". Company has also prepared a procedure to uphold policy on secrecy of whistle blower under "Mekanisme Jaminan Pelapor dan Pengungkapan Kasus" dated 12 June 2015. The purpose of the SOP is to provide clear work guidelines so as to create consistency and better, correct and timely implementation in the delivery and resolution of employee complaints. Non-formal complaint resolution, complaints can be submitted verbally or directly to the superior, then the superior calls the employee</p>	Complied

		<p>concerned no later than 2 days, complaint resolution is made in writing. Formal complaint resolution, employees submit complaints to the department head in writing, the head department calls employees no later than 2 working days to resolve employee complaints. Employee complaints can also be resolved on a bipartite basis.</p> <p>In case there is any harassment and violence, it will be reported to Gender Committee. Documented procedure was established to handle sexual harassment case - SOP AA-HR-309.01- R0 dated 1 February 2009. Company has formed Gender Committee since April 2013 and consist of Chairwoman, vice chairwoman, secretary, vice secretary, members. Gender Committee activities such as handle complaint from female workers, reporting and data collecting if case appeared concerning sexual harassment.</p>	
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.	<p>Bungo Tebo Estate, Mill and Smallholder:</p> <p>The available procedures are as 4.2.1.</p> <p>This mechanism has been socialized to all workers on 14 July 2020 and also to all stakeholder on 15 May 2020.</p> <p>In socializing this procedure, the company is directly explained to employees and when the employee joins the company, so that the procedure can be understood by all employees including employees who cannot read and write (illiterate).</p> <p>In 2021, PT. Rigunas Agri Utama made socialization of company policy for 9 harvesters, 8 upkeep workers and 10 fertilizer applicators in Bungo Tebo Estate, dated 2 September 2021.</p> <p>The sampled workers interviewed admitted the company assistant manager read out and explains the mechanism, because some worker cannot read well.</p>	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.	<p>The company has also established a mechanism / procedure for handling land conflicts. Procedure No. AA-GL-5003.1-R1 Rev. 22 August 2011, where it explained that if the conflict resolution did not meet an agreement, then an alternative would be taken through legal or legal channels.</p>	Complied

		<p>Several complaints from stakeholders are recorded, the company can prove that all related complaints / complaints from stakeholders have been recorded and monitored for the progress process until the minutes of the meeting and the results of the meeting to discuss these complaints, are taken samples:</p> <ol style="list-style-type: none"> 1) In 2016 there was a land dispute (overlapping) within the HGU area of PT. Rigunas Agri Utama, as follows: <ol style="list-style-type: none"> a. NGO Corruption Monitoring and Rescue of State Assets, Letter No: 002/DPW/PK&PHN/JB/KU/VI/2016, dated 25 June 2016. The letter contains indications that PT. Rigunas Agri Utama is cultivated the land outside HGU. b. The Panglimo Djoenid NGO, Tebo Regency, reported to the local Police (Kabupaten Tebo) with Letter No.11/PDJ/TBO/X/16, dated 28 September 2016. The letter contained reports that a group of residents had a legal ownership certificate (SHM) above the HGU of PT. Rigunas Agri Utama where the area is a producing oil palm plant and has been harvested. <p>All of these problems/disputes/grievance have been mediated by the Regent of Tebo through Letter No. 005/1347/Disbun/2016, dated 16 November 2016 and also by the Plantation Office of Tebo Regency through letter No. 525/395/Disbun/2016, dated 28 November 2016.</p> <p>The results of the meeting/mediation concluded that the disputed area would be resolved legally through an inventory of the legality aspects where the collection of 294 community copyrights of ownership certificates (SHM) was issued in 2016 and the HGU of PT. Rigunas Agri Utama will be produced/compared together. In addition, a participatory field check will be carried out to ensure that disputed locations can be traced.</p> <p>On 30 November 2016 a meeting was held with the conclusion that the field checking was postponed after data synchronization was carried out. Data synchronization will be carried out at the Jambi Provincial Office</p>	
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RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		<p>(Kantor Kementerian Agraria dan Tata Ruang/BPN Provinsi Jambi). The Minutes of the Meeting were signed by various parties, including:</p> <ol style="list-style-type: none"> a. Plt. Sekretaris Daerah Kabupaten Tebo b. Kepala Kantor Kesbangpol Kabupaten Tebo c. Kapolsek Serai Serumpun d. KBO Intelkam Polres Tebo e. Kabid Bina Usaha Dinas Perkebunan Tebo f. Kasi Survey, Pengukuran dan Pemetaan BPN Tebo g. Kasi HT&PT BPN Kabupaten Tebo h. Kasi Wasnas Kantor Kesbangpol Kabupaten Tebo i. Kasi Rehabilitasi Kantor LH Kabupaten Tebo j. Kasi Trantib Kecamatan Serai Serumpun k. Staf Dinas Kehutanan Kabupaten Tebo l. GM PT. Rigunas Agri Utama m. Humas PT. Rigunas Agri Utama n. GIS PT. Rigunas Agri Utama <p>On 13 August 2019, a mediation was held which was attended by the Mitra Serumpun Farmer Group (Community), representative of PT. Rigunas Agri Utama management, Police, the Indonesian National Army and the National Land Agency (BPN) with an agenda to discuss conflicts over alleged overlapping of PT. Rigunas Agri Utama's HGU with certificates Community Ownership Rights (Farmer Groups), and the results of the mediation are contained, as follows:</p> <ol style="list-style-type: none"> a. Whereas on the basis of suggestions and input from the Tebo Regency Police and the Indonesian National Army (TNI), to maintain the conducive security and comfort of the environment at the location of the object of the dispute, PT. Rigunas Agri Utama and the community (Mitra Serumpun Farmer Group) are asked to refrain by 	
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		<p>not carrying out activities on the land of the disputed object while waiting for a further legal process which has permanent legal force.</p> <p>b. Whereas both parties must maintain security and order of the environment in the object of dispute and not do things that violate the law</p> <p>c. Whereas it was requested to PT. Rigunas Agri Utama to immediately process a Lawsuit application to the State Administrative Court (Pengadilan Tata Usaha Negara).</p> <p>d. Whereas for point (a) above, PT. Rigunas Agri Utama is requested to be able to provide an answer no later than 14 (fourteen) days after receiving this letter.</p> <p>Furthermore, PT. Rigunas Agri Utama has provided responses and answers to the above mediation results on 13 August 2019 through letter No. 06/LG-RIGUNAS/Ext/VIII/19, contains:</p> <ul style="list-style-type: none"> - PT. Rigunas Agri Utama controls and operates a plot of oil palm plantation in Sungai Rambai Village, Tebo Ulu District, Tebo Regency, Jambi Province covering an area of 1,047.354 Ha as referred to in the HGU certificate No. 17 (formerly No.1, 1 May 1997) granted based on the Decree of Minister of Land/Head of National Land Agency No. 51/HGU/BPN/1996 dated 27 November 1996. - That PT. Rigunas Agri Utama hopes that the law enforcement officials can maintain conduciveness from community disturbances that intend to seize, harvest or obstruct PT. Rigunas Agri Utama's plantation activities - That the HGU has been owned / controlled and planted with oil palm since 1996 without any claim from the community or from any party. <p>Latest update, PT. Rigunas Agri Utama fulfilled summon letter from Kejaksaan Negeri Tebo "Surat Kejaksaan Negeri Tebo No.R-33/L.S.17/Dek.1/11/2020; Kepada Manager Plasma PT. Rigunas Agri Utama; Perihal Permintaan Keterangan untuk menghadap 17 November</p>	
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		<p>2020; Tanggal 11 November 2020". During the meeting in November 2020, PT. Rigunas Agri Utama ordered to present the copy of HGU. Company representative gave the copy of HGU to Kejaksaan.</p> <p>2) Complaints from Lembaga Pemantau, Penyelamat Lingkungan Hidup (LP2LH) NGOs, that:</p> <ul style="list-style-type: none"> - Based on letter No. 14/LP2LH-TEBO/SOMASI/VII/2019 from the NGO, the Regional Leadership Council of the Monitoring Agency, Environmental Rescue District. Tebo on 29 July 2019 addressed to PT. Rigunas Agri Utama and CC to the Minister of the Environment and Forestry of the Republic of Indonesia in Jakarta, the Indonesian Attorney General's Office in Jakarta, Tebo Regency Attorney's Office and DPP LP2LH regarding: Somasi on the alleged disposal of PT. Rigunas Agri Utama mill waste to environment. This assumption after field observations was made on 28 July 2019, resulted in: - In the replanting area found a broken waste water pipe caused by replanting activities using heavy equipment. - In carrying out stacking activities, we are of the opinion that PT. Rigunas Agri Utama does not pay attention to environmental conservation norms where we see that many of the Lauan creek are buried for planting purposes - There are still many oil palm trees planted in riparian conservation areas. - As a result of the alleged environmental pollution, we have found that there have been victims from several communities in Dusun Tanjung and Tuo Sumay Viollage, Sumay District, Tebo Regency contracted with itching after using the Batang Sumay river water for bathing. - The condition of the main village road is dusty so it is disturbing and difficult to breathe, so PT. Rigunas Agri Utama is obliged to watering the road but it is not implemented. 	
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		<p>PT. Rigunas Agri Utama conveyed this matter to the Environmental Office of Tebo Regency on 29 July 2019. Representatives from Environmental Office of Tebo Regency conducted a field check and carried out 5 samples of water that suspected have been contaminated by mill waste on 21 August 2019, with locations in the Rattan River, Salak Sengkilan River, waste water pond, Block B19A trench water, monitoring well at Land Application and non-LA block to carry out laboratory checks.</p> <p>With the invitation from the LP2LH NGO on 29 July 2019, a mediation was held between the DPD LP2LH of Tebo Regency and PT. Rigunas Agri Utama on 11 September 2019, the results was recorded in the Minutes of Mediation between DPD LP2LH Tebo Regency with PT. Rigunas Agri Utama, as follows:</p> <ul style="list-style-type: none"> - Based on the results of laboratory testing, the assumption that the tested samples came from the factory was not proven, because the samples tested with waste are far different. - Some of the sample test results exceeded the TSS and COD quality standards due to replanting activities - The company will make efforts to plant legume cover crop to overcome TSS and COD problems that exceed quality standards. - LP2LH asked PT. Rigunas Agri Utama to pay attention to complaints from the community around the company's activities. - Both parties accept the results of the mediation facilitated by the Environmental Agency of Tebo Regency (DLH Kabupaten Tebo) and will not sue each other in any form. 	
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	The company has established a mechanism / procedure for handling land conflicts. Procedure No. AA-GL-5003.1-R1 Rev. 22 August 2011, it was also explained that if the conflict resolution did not meet an agreement, Several alternative dispute resolution / grievances that can be done, including:	Complied

	<p>them and/or act as observers, as well as the option of a third-party mediator.</p>	<p>1) Mediation between the two parties or by representatives of the parties who are also mediated by the competent government agency (e.g.: BPN, Disnakertran, Dinas Lingkungan Hidup).</p> <p>2) Follow-up conflict resolution by legal or litigation if the conflict / dispute / grievance cannot be resolved by negotiation or mediation.</p> <p>In the period 2019-2020 there is a conflict related to land overlapping between HGU owned by PT RAU and the certificate of property (SHM) of the people around the plantation, as explained in 4.2.3. As a result, the agreement meeting between the two parties has been conducted mediated by third-party from local government (Land Office and regent of Tebo Regency) as well. (see 4.2.3).</p>	
<p>Criteria 4.3: The unit of certification contributes to local sustainable development as agreed by local communities.</p>			
<p>4.3.1</p>	<p>Contributions to community development that are based on the results of consultation with local community are demonstrated.</p>	<p>PT. Rigunas Agri Utama made identification of village community need "Identifikasi Kebutuhan Masyarakat Desa Sekitar Perusahaan" dated 4 January 2021, where 5 villages participated; Tuo Sumay village, Teriti village, Pinang Belai village, Jati Belarik village, Kandang village. The identification process covers village's interest in social project, economy project, education project, health project and infrastructure project. For example: Tuo Sumay village shows medium education condition and shows medium interest in education project.</p> <p>PT. Rigunas Agri Utama made meeting with surrounding villages to discuss Corporate Social Responsibility Program in year 2021. The meeting carried out on 22 January 2021, recorded in "Berita Acara Pembuatan Program CSR 2021" signed by Tuo Sumay village head, Teriti village head, Tanjung Dani hamlet head, Pinang Belai village head, "Dinas Perkebunan".</p> <p>The program including:</p> <ul style="list-style-type: none"> - Cattle farming as Community's economy empowerment; - Donation for religious festivals; - Donation for local wisdom Tanjung Dani village; 	<p>Complied</p>

		<ul style="list-style-type: none"> - Assistance in material for construction of Madrasah in Bukit Harapan and Tuo Sumay village; - School facility construction in SDN 217/VIII, Bukit Harapan village; - School room renovation in SDN 110/VIII Tanjung Dani hamlet; - Free medical examination and COVID-19 protocol in Tuo Sumay village; - Construction of bore well in Tuo Sumay village; 	
Criteria 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.			
4.4.1	<p>(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed (FPIC) process. Documents related to the history of land tenure and the actual legal or customary use of the land are available.</p>	<p>Bungo Tebo POM and Estate: PT. Rigunas Agri Utama chronological information of the acquisition of land rights and their amendments in a well-organized document consisting of: I. Minutes of Land Inspection "Panitia B" No.02/Pan.B/1994 dated 14 April 1994. Explaining PT. Rigunas Agri Utama proposed a 5,000 Ha HGU for Oil Palm plantations using the PIR TRANS model in Sungai Rambai Village, Sumay District. The results of the examination: have been reserved (Decree of the Governor of the Jambi Region No.176 of 1990) covering an area of 30,000 Ha; Obtained Forest Release Decree from the Minister of Forestry (No.771/Kpts-II/93, dated 18 November 1990) covering an area of 22,710 Ha; The land requested is located in Sungai Rambai Village with an area of 2,316 hectares according to the Special Situation Drawing Map No. 02/1993 dated 29 September 1993; Land condition: in the form of forest; some have been cleared and planted with palm oil covering an area of 150 Ha; Rolling soil conditions with a slope of 10% - 40%; Public Interest and Public Interest: No objections, No electricity poles; There are no buildings; Conclusion: The approved land area is 2,318 Ha. Situation Figure No.161/1994 with an area of 2,318.5 Ha. In 1996 PT. Rigunas Agri Utama obtained HGU as stipulated in the HGU Decree based on the Decree of the State Minister for Agrarian Affairs (Head of BPN) No.51/HGU/BPN/96; concerning the Granting of HGU on behalf of PT. Rigunas Agri Utama, dated 27 November 1996. The land granted was 4,388.50 Ha</p>	Complied

		<p>located in Tebo Ulu District and Perwakilan Sumai District, Bungo Tebo Regency, Jambi Province; From the results of the meeting of the Committee B stated that the entire land was 4,388.50 Ha; From the results of the Situation Figure dated 3 May 1994 No.161/1994 (covering an area of 2,318.50 Ha) and on 3 May 1994 No.160/1994 (an area of 2,070 Ha) a total of 4,388.50 Ha. Granted 35-year land use rights for 4,388.50 Ha for PIR TRANS plasma plantations.</p> <p>As a follow-up to the issuance of the HGU Decree, the Bungo Tebo Regency Land Office issued two HGU certificates along with the transition history, namely:</p> <p>a. HGU Land Book No.1 (Entry List 208 No.397/1997 - Entry List 307 No. 175/1997 - 06.03.12.03.2.00001). Situation Figure No.160 / 1994 dated 3 May 1994 covering an area of 2,070 Ha. The HGU is valid for 35 years, until 1 May 2032.</p> <p>There was an amendment based on the Decree of the Minister of State for Agrarian Affairs Head of BPN No.3-V-2002 dated May 28, 2002 concerning the Granting of Permits to Release Part of Business Use Rights over Land located in Bungo Tebo Regency, Jambi Province on land covering an area of 465.70 Ha. Applicable with the revised situation image dated July 19, 2002. So the new area is 2,070 Ha (initial decree) - 465.70 Ha = an area of 1,604.30 Ha. Situation map with a scale of 1: 50,000.</p> <p>b. HGU Land Book No.1 (Entry List 208 No.396 / 1997 - Entry List 307 No. 173/1997 - 06.03.06.11.2.00001). Situation Figure No. 160/1994 dated 3 May 1994 covering an area of 2,318.5 Ha. The HGU is valid for 35 years, until 1 May 2032. There was an amendment based on the Decree of the State Minister for Agrarian Affairs Head of BPN No.5-VIII-1999 dated 3 August 1999 concerning the Granting of Permits to Release Part of Business Use Rights over Land located in Bungo Tebo Regency, Jambi Province on land of 636.3 Ha. The new area is 1,682.2 Ha.</p>	
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		<p>Then there was a change based on the Decree of the Minister of State for Agrarian Affairs Head of BPN No.3-V-2002 dated 28 May 2002 concerning the Granting of Permits to Release Part of Business Use Rights over Land located in Bungo Tebo Regency, Jambi Province, on a land area of 634,846 Ha, so that the new total area became 1,047,354 Ha. Equipped with a Situation Map with a scale of 1: 50,000.</p> <p>Important note:</p> <p>The background of the reduction in HGU area is due to limited land reserves for plasma smallholders. On 27 November 1996 according to the request of PT. Rigunas Agri Utama, granted HGU covering an area of 43,88.5 Ha, due to lack of land for plasma farmers, the farmers urged to carry out a lottery of plot, so at the suggestion of the local government of Tebo Regency, part of the core area of PT. Rigunas Agri Utama was allocated as a plasma plantation with the following stages:</p> <ol style="list-style-type: none"> a. Phase I in 1999 covering an area of 636.3 Ha. In accordance with the explanation above: based on the Decree of the Minister of State for Agrarian Affairs Head of BPN No.5-VIII-1999 dated 3 August 1999 concerning the Issuance of Permits for the Release of Partial Business Use Rights over Land located in Bungo Tebo Regency, Jambi Province on a land area of 636.3 Ha. b. Phase II of 2002 covering an area of 1,100.55 Ha. In accordance with the explanation above: based on the Decree of the Minister of State for Agrarian Affairs Head of BPN No.3-V-2002 dated 28 May 2002 concerning the Granting of Permits to Release Part of Business Use Rights over Land located in Bungo Tebo Regency, Jambi Province on a land area of 465.70 Ha. <p>Based on the description above, it shows that the total HGU area of PT. Rigunas Agri Utama currently amounts to 2,651,654 Ha. Furthermore, based on the Letter of the Director General of Plantation Production Development No. KB/320/265/DJ-BUN.1/V/ 2001 dated 8 May 2001, a statement from the Bupati</p>	
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		<p>of Tebo No.525 /459.1/Disbun dated 26 November 2001 regarding the land area of PT. Rigunas Agri Utama consists of 10,357.55 Ha, consisting of 2,193.85 Ha of nucleus/Inti estates and 8,173.70 Ha of plasma plantations.</p> <p>II. In 2016, PT. Rigunas Agri Utama obtained HGU in accordance with the Decree of the Head of the Jambi Province BPN Regional Office No.03/HGU/BPN.15/2016, dated 5 August 2016. The total area granted the right is 715.63 Ha and consists of 6 HGU certificates:</p> <ol style="list-style-type: none"> 1. HGU Certificate No. 39 Tuo Sumay Village, dated 19 August 2016. Area: 133.71 Ha. Validity period until 5 August 2046. Based on "Surat Ukur No.28/06.09.00.00/2016 dated 18 August 2016". 2. HGU Certificate No. 40 Teluk Singkawang Village, dated 19 August 2016. Area: 108.06 Ha. Validity period until 5 August 2046. Based on "Surat Ukur No.29/06.09.00.00/2016 dated 18 August 2016". 3. HGU Certificate No. 41 Tuo Sumay Village, dated 19 August 2016. Area: 103.97 Ha. Validity period until 5 August 2046. Based on "Surat Ukur No.30/06.09.00.00/2016 dated 18 August 2016". 4. HGU Certificate No. 42 Tuo Sumay Village, dated 19 August 2016. Area: 74.14 Ha. Validity period until 5 August 2046. Based on "Surat Ukur No.31/06.09.00.00/2016 dated 18 August 2016". 5. HGU Certificate No. 43 Tuo Sumay Village, dated 19 August 2016. Area: 134.02 Ha. Validity period until 5 August 2046. Based on "Surat Ukur No.32/06.09.00.00/2016 dated 18 August 2016". 6. HGU Certificate No. 44 Pinang Belai Village, dated 19 August 2016. Area: 161.73 Ha. Validity period until 5 August 2046. Based on "Surat Ukur No.33/06.09.00.00/2016 dated 18 August 2016". <p>Therefore the total HGU area of PT. Rigunas Agri Utama as a whole is 3,367.284 Ha.</p> <p>Scheme Smallholder:</p>	
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		<p>For smallholders, legal ownership is in the form of Land Ownership Certificate (Sertifikat Hak Milik). The smallholder legal ownership obtained in various year period, 2002, 2004, 2014 based on PIR-TRANS program since 1999 up to 2001. There is no issue related land dispute between smallholders.</p> <p>The legal ownership for smallholder members was in the form of Land Certificate (Sertifikat Hak Milik/SHM). The smallholder legal ownership obtained in various year period; 2002, 2004, 2014 based on PIR-TRANS program since 1999 up to 2001. The PIR-Trans program was allocated on state land. Based on communication with Lembaga Adat Tuo Sumay, the allocated land was not customary.</p> <p>There was no issue related land dispute between smallholders and/or between smallholders and local communities.</p> <p>PT. Rigunas Agri Utama in Bungo Tebo has been established since the beginning with the PIR TRANS partnership schemes. Currently PT. Rigunas Agri Utama's plasma/scheme smallholders area has been 5,914 hectares since 1995. This activity has been reported to the Dinas Kehutanan dan Perkebunan Tebo Regency, Jambi Province in the form of a Plantation Business Activity Development Semester Report. Based on document verification, it shows that there has been no additional plasma development since 2000.</p> <p>In this recertification assessment, samples of PT. Rigunas Agri Utama's scheme smallholders land ownership was taken from 5 KUDs totalling 51 farmers, a list of certificate of ownership (Sertifikat Hak Milik) are available.</p> <p>KUD Tanjung Aur Duri</p> <ul style="list-style-type: none"> - 3243 Muftahudin - Mardiana; "Sertipikat Hak Milik No.06.03.12.03.1.0271" dated 26 September 2002 based on mapping "Surat Ukur 269/Tuo Sumay/2002" dated 10 September 2002 of 2.16 Ha for Muftahudin. Current owner Mardiana. - 3267 M. Badri HR – Najuah Pul; "Sertipikat Hak Milik No.06.03.12.03.1.0262" dated 26 September 2002 based on mapping 	
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		<p>"Surat Ukur 260/Tuo Sumay/2002" dated 10 September 2002 of 2.16 Ha for M. Badri HR. Current owner Najuah Pul.</p> <p>KUD Belarik Jaya</p> <ul style="list-style-type: none"> - 2321 Zainab – Tampubolon; "Sertipikat Hak Milik No.06.03.12.03.0014" dated 26 September 2002 based on mapping "Surat Ukur 14/Kandang/2002" dated 10 September 2002 of 2.14 Ha for Zainab. Current owner Tampubolon. - 2323 Syamsuar – Sembiring; "Sertipikat Hak Milik No.06.03.12.03.0007" dated 26 September 2002 based on mapping "Surat Ukur 5/Tuo Sumay/2002" dated 10 September 2002 of 1.99 Ha for Syamsuar. Current owner Sembiring. <p>KUD Sumay Jaya</p> <ul style="list-style-type: none"> - 2101 Fauzi – Inal; "Sertipikat Hak Milik No.06.03.12.03.0193" dated 26 September 2002 based on mapping "Surat Ukur 191/Tuo Sumay/2002" dated 10 September 2002 of 2.009 Ha for Fauzi. Current owner Inal. - 2124 Hasan B – Andrial; "Sertipikat Hak Milik No.06.03.12.03.0202" dated 26 September 2002 based on mapping "Surat Ukur 200/Tuo Sumay/2002" dated 10 September 2002 of 2.045 Ha for Hasan B. Current owner Andrial. 	
4.4.2	<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 that HGU of PT. Rigunas Agri Utama was allocated by government as informed in 4.4.1. PT. Rigunas Agri Utama chronological information of the acquisition of land rights and their amendments in a well-organized document consisting of:</p> <p>I. Minutes of Land Inspection "Panitia B" No.02/Pan.B/1994 dated 14 April 1994. Explaining PT. Rigunas Agri Utama proposed a 5,000 Ha HGU for Oil Palm plantations using the PIR TRANS model in Sungai Rambai Village, Sumay District. The results of the examination: have been reserved (Decree of the Governor of the Jambi Region No.176 of 1990) covering an area of 30,000 Ha; Obtained Forest Release Decree from the Minister of Forestry (No.771/Kpts-II/93, dated 18 November 1990) covering an area of 22,710 Ha; The land</p>	Complied

		<p>requested is located in Sungai Rambai Village with an area of 2,316 hectares according to the Special Situation Drawing Map No. 02/1993 dated 29 September 1993; Land condition: in the form of forest; some have been cleared and planted with palm oil covering an area of 150 Ha; Rolling soil conditions with a slope of 10% - 40%; Public Interest and Public Interest: No objections, No electricity poles; There are no buildings; Conclusion: The approved land area is 2,318 Ha. Situation Figure No.161/1994 with an area of 2,318.5 Ha.</p> <p>In 1996 PT. Rigunas Agri Utama obtained HGU as stipulated in the HGU Decree based on the Decree of the State Minister for Agrarian Affairs (Head of BPN) No.51/HGU/BPN/96; concerning the Granting of HGU on behalf of PT. Rigunas Agri Utama, dated 27 November 1996. The land granted was 4,388.50 Ha located in Tebo Ulu District and Perwakilan Sumai District, Bungo Tebo Regency, Jambi Province; From the results of the meeting of the Committee B stated that the entire land was 4,388.50 Ha; From the results of the Situation Figure dated 3 May 1994 No.161/1994 (covering an area of 2,318.50 Ha) and on 3 May 1994 No.160/1994 (an area of 2,070 Ha) a total of 4,388.50 Ha. Granted 35-year land use rights for 4,388.50 Ha for PIR TRANS plasma plantations.</p> <p>As a follow-up to the issuance of the HGU Decree, the Bungo Tebo Regency Land Office issued two HGU certificates along with the transition history, namely:</p> <p>a. HGU Land Book No.1 (Entry List 208 No.397/1997 - Entry List 307 No. 175/1997 - 06.03.12.03.2.00001). Situation Figure No.160 / 1994 dated 3 May 1994 covering an area of 2,070 Ha. The HGU is valid for 35 years, until 1 May 2032.</p> <p>There was an amendment based on the Decree of the Minister of State for Agrarian Affairs Head of BPN No.3-V-2002 dated May 28, 2002 concerning the Granting of Permits to Release Part of Business Use Rights over Land located in Bungo Tebo Regency, Jambi Province on land covering an area of 465.70 Ha. Applicable with the revised situation image dated July 19, 2002. So the</p>	
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		<p>new area is 2,070 Ha (initial decree) - 465.70 Ha = an area of 1,604.30 Ha. Situation map with a scale of 1: 50,000.</p> <p>b. HGU Land Book No.1 (Entry List 208 No.396 / 1997 - Entry List 307 No. 173/1997 - 06.03.06.11.2.00001). Situation Figure No. 160/1994 dated 3 May 1994 covering an area of 2,318.5 Ha. The HGU is valid for 35 years, until 1 May 2032. There was an amendment based on the Decree of the State Minister for Agrarian Affairs Head of BPN No.5-VIII-1999 dated 3 August 1999 concerning the Granting of Permits to Release Part of Business Use Rights over Land located in Bungo Tebo Regency, Jambi Province on land of 636.3 Ha. The new area is 1,682.2 Ha.</p> <p>Then there was a change based on the Decree of the Minister of State for Agrarian Affairs Head of BPN No.3-V-2002 dated 28 May 2002 concerning the Granting of Permits to Release Part of Business Use Rights over Land located in Bungo Tebo Regency, Jambi Province, on a land area of 634,846 Ha, so that the new total area became 1,047,354 Ha. Equipped with a Situation Map with a scale of 1: 50,000.</p> <p>Important note:</p> <p>The background of the reduction in HGU area is due to limited land reserves for plasma smallholders. So that on 27 November 1996 according to the request of PT. Rigunas Agri Utama, granted HGU covering an area of 43,88.5 Ha, due to lack of land for plasma farmers, the farmers urged to carry out a lottery of plot, so at the suggestion of the local government of Tebo Regency, part of the core area of PT. Rigunas Agri Utama was allocated as a plasma plantation with the following stages:</p> <p>a. Phase I in 1999 covering an area of 636.3 Ha. In accordance with the explanation above: based on the Decree of the Minister of State for Agrarian Affairs Head of BPN No.5-VIII-1999 dated 3 August 1999 concerning the Issuance of Permits for the Release of Partial Business Use Rights over Land located in Bungo Tebo Regency, Jambi Province on a land area of 636.3 Ha.</p>	
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		<p>b. Phase II of 2002 covering an area of 1,100.55 Ha. In accordance with the explanation above: based on the Decree of the Minister of State for Agrarian Affairs Head of BPN No.3-V-2002 dated 28 May 2002 concerning the Granting of Permits to Release Part of Business Use Rights over Land located in Bungo Tebo Regency, Jambi Province on a land area of 465.70 Ha.</p> <p>Based on the description above, it shows that the total HGU area of PT. Rigunas Agri Utama currently amounts to 2,651,654 Ha. Furthermore, based on the Letter of the Director General of Plantation Production Development No. KB/320/265/DJ-BUN.1/V/ 2001 dated 8 May 2001, a statement from the Bupati of Tebo No.525 /459.1/Disbun dated 26 November 2001 regarding the land area of PT. Rigunas Agri Utama consists of 10,357.55 Ha, consisting of 2,193.85 Ha of nucleus/Inti estates and 8,173.70 Ha of plasma plantations.</p> <p>Based on document verification and statement from government officials, PT. Rigunas Agri Utama did not conduct any new land clearing. However, company established procedure for settling land compensation if new land clearing is necessary for plantation expansion. The procedure established in "Standard Operating Procedure (SOP) No.AA-GL-5003.1-R2.</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>The HGU was issued in accordance to the Decree of the Head of the Jambi Province BPN Regional Office No.03/HGU/ BPN.15/2016, dated 5 August 2016. The total area granted the right is 715.63 Ha.</p> <p>PT. Rigunas Agri Utama demonstrates statement letter from surrounding villages on land process by the company:</p> <ol style="list-style-type: none"> a. "Surat Keterangan Kepala Desa Tuo Sumay No.051/KD/TS/2016", dated 28 January 2016. b. "Surat Keterangan Kepala Desa Teluk Singkawan No.27/SK/HS/2016", dated 28 January 2016. c. "Surat Keterangan Kepala Desa Pinang Belai No.38/SKD/PB/2016", dated 28 January 2016. 	

	<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>The letter from village head statement the area proposed by PT. Rigunas Agri Utama for HGU located in Tuo Sumay Village, Teluk Singkawang village and Pinang Belai village, Sumay district, Tebo regency is not under dispute with other party and have not been allocated by another party.</p> <p>The surrounding communities agreed to jointly develop scheme smallholder with the company as nucleus. As explained above, company demonstrate excision of company-owned plantation for smallholder allocation.</p>	
<p>4.4.3</p>	<p>(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).</p>	<p>Bungo Tebo Estate and Mill</p> <p>For land issue as above mention (Indicator 4.4.1 and 4.4.2), the land conflict area has been mapped "Peta Identifikasi Kepemilikan Lahan" Scale 1:43,082 and Identification of Unable Managed Area "Peta Identifikasi Area yang Tidak Dikuasai PT Rigunas Agri Utama – Kebun Bungo Tebo".</p> <p>Scheme Smallholders:</p> <p>No customary and traditional rights within smallholder's area. For smallholders, legal ownership is in the form of Land Certificate Ownership Right (Sertifikat Hak Milik). The smallholder legal ownership obtained in various year period, 2002, 2004, 2014 based on PIR-TRANS program since 1999 upto 2001.</p> <p>The legal ownership for smallholder members was in the form of Land Certificate (Sertifikat Hak Milik/SHM). The smallholder legal ownership obtained in various year period; 2002, 2004, 2014 based on PIR-TRANS program since 1999 up to 2001. The PIR-Trans program was allocated on state land. Based on communication with Lembaga Adat Tuo Sumay, the allocated land was not customary.</p> <p>There was no issue related land dispute between smallholders and/or between smallholders and local communities.</p>	<p>Complied</p>

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4.4.4	All relevant information is available in appropriate forms and languages, including assessment of impact, proposed benefit sharing, and legal arrangements.	PT. Rigunas Agri Utama has conducted social impact assessment and environmental impact assessment. 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.	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.	<p>In the process for issuance of HGU in accordance with the Decree of the Head of the Jambi Province BPN Regional Office No.03/HGU/ BPN.15/2016, dated 5 August 2016. The total area granted the right is 715.63 Ha.</p> <p>PT. Rigunas Agri Utama demonstrates statement letter from surrounding villages on land process by the company:</p> <ul style="list-style-type: none"> a. "Surat Keterangan Kepala Desa Tuo Sumay No.051/KD/TS/2016", dated 28 January 2016. b. "Surat Keterangan Kepala Desa Teluk Singkawan No.27/SK/HS/2016", dated 28 January 2016. c. "Surat Keterangan Kepala Desa Pinang Belai No.38/SKD/PB/2016", dated 28 January 2016. <p>The letter from village head statement the area proposed by PT. Rigunas Agri Utama for HGU located in Tuo Sumay Village, Teluk Singkawang village and Pinang Belai village, Sumay district, Tebo regency is not under dispute with other party and have not been allocated by another party.</p>	Complied
4.4.6	There is evidence that implementation of agreement negotiated through FPIC is annually reviewed in consultation with affected parties.	<p>Based on interview, document review and stakeholder consultation, the oil palm plantation developed by PT. Rigunas Agri Utama in process for issuance State Minister for Agrarian Affairs (Head of BPN) No.51/HGU/BPN/96; concerning the Granting of HGU for PT. Rigunas Agri Utama, with land of 2,651,654 Ha, dated 27 November 1996; the land was allocated from state land (See 4.4.1). There was no land compensated for oil palm plantation development.</p> <p>As seen in 4.4.5, The HGU issued in 2016 was allocated from state land, as per the letter from village head statement: the area proposed by PT. Rigunas Agri</p>	Complied

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		Utama for HGU located in Tuo Sumay Village, Teluk Singkawang village and Pinang Belai village, Sumay district, Tebo regency is not under dispute with other party and have not been allocated by another party.	
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 interview, document review and stakeholder consultation, the oil palm plantation developed by PT. Rigunas Agri Utama is in accordance with State Minister for Agrarian Affairs (Head of BPN) No.51/HGU/BPN/96; concerning the Granting of HGU for PT. Rigunas Agri Utama, with land of 2,651.654 Ha, dated 27 November 1996; the land was allocated from state land (See 4.4.1). There was no land compensated for oil palm plantation development.	Not Applicable
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 interview, document review and stakeholder consultation, the oil palm plantation developed by PT. Rigunas Agri Utama is in accordance with State Minister for Agrarian Affairs (Head of BPN) No.51/HGU/BPN/96; concerning the Granting of HGU for PT. Rigunas Agri Utama, with land of 2,651.654 Ha, dated 27 November 1996; the land was allocated from state land (See 4.4.1). There was no land compensated for oil palm plantation development.	Not Applicable
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-	Based on interview, document review and stakeholder consultation, the oil palm plantation developed by PT. Rigunas Agri Utama is in accordance with State Minister for Agrarian Affairs (Head of BPN) No.51/HGU/BPN/96; concerning the Granting of HGU for PT. Rigunas Agri Utama, with land of 2,651.654 Ha, dated 27 November 1996; the land was allocated from state land (See 4.4.1). There was no land compensated for oil palm plantation development.	Not Applicable

	<p>coercive and entered into voluntarily and carried out prior to new operations.</p>	<p>As seen in 4.4.5, The HGU issued in 2016 was allocated from state land, as per the letter from village head statement: the area proposed by PT. Rigunas Agri Utama for HGU located in Tuo Sumay Village, Teluk Singkawang village and Pinang Belai village, Sumay district, Tebo regency is not under dispute with other party and have not been allocated by another party.</p> <p>Based on document verification and statement from government officials, audit team gather information PT. Rigunas Agri Utama did not conduct any new land clearing. However, company established procedure for settling land compensation if new land clearing is necessary for plantation expansion. The procedure established in "Standard Operating Procedure (SOP) No.AA-GL-5003.1-R2.</p>	
<p>4.5.4</p>	<p>To ensure local food and water security and as part of the FPIC process, SEIA participation and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of land allocations process.</p>	<p>Based on interview, document review and stakeholder consultation, the oil palm plantation developed by PT. Rigunas Agri Utama is in accordance with State Minister for Agrarian Affairs (Head of BPN) No.51/HGU/BPN/96; concerning the Granting of HGU for PT. Rigunas Agri Utama, with land of 2,651,654 Ha, dated 27 November 1996; the land was allocated from state land (See 4.4.1). There was no land compensated for oil palm plantation development.</p> <p>As seen in 4.4.5, The HGU issued in 2016 was allocated from state land, as per the letter from village head statement: the area proposed by PT. Rigunas Agri Utama for HGU located in Tuo Sumay Village, Teluk Singkawang village and Pinang Belai village, Sumay district, Tebo regency is not under dispute with other party and have not been allocated by another party.</p> <p>Based on document verification and statement from government officials, audit team gather information PT. Rigunas Agri Utama did not conduct any new land clearing. However, company established procedure for settling land compensation if new land clearing is necessary for plantation expansion. The procedure established in "Standard Operating Procedure (SOP) No.AA-GL-5003.1-R2.</p>	<p>Not Applicable</p>

4.5.5	Evidence is available that the affected communities and rights holders have had the option to access information and advice, that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.	<p>Based on interview, document review and stakeholder consultation, the oil palm plantation developed by PT. Rigunas Agri Utama is in accordance with State Minister for Agrarian Affairs (Head of BPN) No.51/HGU/BPN/96; concerning the Granting of HGU for PT. Rigunas Agri Utama, with land of 2,651,654 Ha, dated 27 November 1996; the land was allocated from state land (See 4.4.1). There was no land compensated for oil palm plantation development.</p> <p>As seen in 4.4.5, The HGU issued in 2016 was allocated from state land, as per the letter from village head statement: the area proposed by PT. Rigunas Agri Utama for HGU located in Tuo Sumay Village, Teluk Singkawang village and Pinang Belai village, Sumay district, Tebo regency is not under dispute with other party and have not been allocated by another party.</p> <p>Based on document verification and statement from government officials, audit team gather information PT. Rigunas Agri Utama did not conduct any new land clearing. However, company established procedure for settling land compensation if new land clearing is necessary for plantation expansion. The procedure established in "Standard Operating Procedure (SOP) No.AA-GL-5003.1-R2.</p>	Not Applicable
4.5.6	Evidence is available that the communities or their representatives gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.	<p>Based on interview, document review and stakeholder consultation, the oil palm plantation developed by PT. Rigunas Agri Utama is in accordance with State Minister for Agrarian Affairs (Head of BPN) No.51/HGU/BPN/96; concerning the Granting of HGU for PT. Rigunas Agri Utama, with land of 2,651,654 Ha, dated 27 November 1996; the land was allocated from state land (See 4.4.1). There was no land compensated for oil palm plantation development.</p> <p>As seen in 4.4.5, The HGU issued in 2016 was allocated from state land, as per the letter from village head statement: the area proposed by PT. Rigunas Agri Utama for HGU located in Tuo Sumay Village, Teluk Singkawang village and Pinang Belai village, Sumay district, Tebo regency is not under dispute with other party and have not been allocated by another party.</p>	Not Applicable

		Based on document verification and statement from government officials, audit team gather information PT. Rigunas Agri Utama did not conduct any new land clearing. However, company established procedure for settling land compensation if new land clearing is necessary for plantation expansion. The procedure established in "Standard Operating Procedure (SOP) No.AA-GL-5003.1-R2.	
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.	Based on interview with management, document review and stakeholder consultation, there was no new land acquisition in the scope of certification PT. Rigunas Agri Utama-Bungo Tebo POM and its supply bases.	Not Applicable
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation.	Based on interview with management, document review and stakeholder consultation, there was no new land acquisition in the scope of certification PT. Rigunas Agri Utama-Bungo Tebo POM and its supply bases.	Not Applicable
Criteria 4.6: Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			
4.6.1	(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.	The Certificate Holder has had a procedure to resolve land conflict, Standard Operating Procedure (SOP) No.AA-GL-5003.1-R2 revision 2 dated 8 May 2015 regarding Land Conflict Handling. The SOP described flow process and mechanism to handle land conflict. The SOP has taking into consideration the FPIC guide for RSPO Member 2015, whereby in the SOP has regulate information land conveyance, negotiation, participatory land measurement and other activities including engagement with relevant parties and other parties neighboring the plantation and/or conflict land. Including, identifying whether or not customary, legal or other rights and its compensation calculation. For smallholders, legal ownership is in the form of Land Certificate Ownership Right (Sertifikat Hak Milik). The smallholder legal ownership obtained in various	Complied

		year period, 2002, 2004, 2014 based on PIR-TRANS program since 1999 upto 2001. There is no issue related land dispute between smallholders.	
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.	The Certificate Holder has had a procedure to resolve land conflict, Standard Operating Procedure (SOP) No.AA-GL-5003.1-R2 revision 2 dated 8 May 2015 regarding Land Conflict Handling. The SOP described flow process and mechanism to handle land conflict. The SOP has taking into consideration the FPIC guide for RSPO Member 2015, whereby in the SOP has regulate information land conveyance, negotiation, participatory land measurement and other activities including engagement with relevant parties and other parties neighboring the plantation and/or conflict land. Including, identifying whether or not customary, legal or other rights and its compensation calculation. For smallholders, legal ownership is in the form of Land Certificate Ownership Right (Sertifikat Hak Milik). The smallholder legal ownership obtained in various year period, 2002, 2004, 2014 based on PIR-TRANS program since 1999 upto 2001. There is no issue related land dispute between smallholders.	Complied
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).	Explained in 4.4.2 above, the surrounding communities agreed to jointly develop scheme smallholder with the company as nucleus. As explained above, company demonstrate excision of company-owned plantation for smallholder allocation. There was no difference in land title for smallholder – company follows government program to standardize the land size at 2 Ha per household.	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.	PT. Rigunas Agri Utama demonstrated that any negotiated agreements, compensation, and payments are documented with participation of affected parties and made available for review. These evident elaborated as per indicator 4.2.3.	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.	The Certificate Holder has a procedure to resolve land conflict, Standard Operating Procedure (SOP) No.AA-GL-5003.1-R2 revision 2 dated 8 May 2015	Complied

		<p>regarding Land Conflict Handling. The SOP described flow process and mechanism to handle land conflict. The SOP has taking into consideration the FPIC guide for RSPO Member 2015, whereby in the SOP has regulate information land conveyance, negotiation, participatory land measurement and other activities including engagement with relevant parties and other parties neighboring the plantation and/or conflict land. Including, identifying whether or not customary, legal or other rights and its compensation calculation.</p> <p>For smallholders, legal ownership is in the form of Land Certificate Ownership Right (Sertifikat Hak Milik). The smallholder legal ownership obtained in various year period, 2002, 2004, 2014 based on PIR-TRANS program since 1999 upto 2001. There is no issue related land dispute between smallholders.</p>	
4.7.2	<p>(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.</p>	<p>The Certificate Holder has had a procedure to resolve land conflict, Standard Operating Procedure (SOP) No.AA-GL-5003.1-R2 revision 2 dated 8 May 2015 regarding Land Conflict Handling. The SOP described flow process and mechanism to handle land conflict. The SOP has taking into consideration the FPIC guide for RSPO Member 2015, whereby in the SOP has regulate information land conveyance, negotiation, participatory land measurement and other activities including engagement with relevant parties and other parties neighboring the plantation and/or conflict land. Including, identifying whether or not customary, legal or other rights and its compensation calculation.</p> <p>For smallholders, legal ownership is in the form of Land Certificate Ownership Right (Sertifikat Hak Milik). The smallholder legal ownership obtained in various year period, 2002, 2004, 2014 based on PIR-TRANS program since 1999 upto 2001. There is no issue related land dispute between smallholders.</p>	Complied
4.7.3	<p>Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.</p>	<p>The plantation developed by PT. Rigunas Agri Utama in HGU of 3,367.284 Ha was allocated from state land (See 4.4.1).</p> <p>However, PT. Rigunas Agri Utama is developing scheme smallholder for 2,900 household incorporated in 18 cooperatives whose managing oil palm plantation of 5,914 Ha.</p>	Complied

Criteria 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrated that they have legal customary, or user rights.			
4.8.1	Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.	<p>The company has also established a mechanism / procedure for handling land conflicts. Procedure No. AA-GL-5003.1-R1 Rev. 22 August 2011, where it explained that if the conflict resolution did not meet an agreement, then an alternative would be taken through legal or legal channels.</p> <p>Complaints from stakeholders are recorded, the company can prove that all related complaints / complaints from stakeholders have been recorded and monitored for the progress process until the minutes of the meeting and the results of the meeting to discuss these complaints, are taken samples:</p> <p>1) In 2016 there was a land dispute (overlapping) within the HGU area of PT. Rigunas Agri Utama, as follows:</p> <ul style="list-style-type: none"> a. NGO Corruption Monitoring and Rescue of State Assets, Letter No: 002/DPW/PK&PHN/JP/KU/VI/2016, dated 25 June 2016. The letter contains indications that PT. Rigunas Agri Utama is cultivated the land outside HGU. b. The Panglimo Djoenid NGO, Tebo Regency, reported to the local Police (Kabupaten Tebo) with Letter No.11/PDJ/TBO/X/16, dated 28 September 2016. The letter contained reports that a group of residents had a legal ownership certificate (SHM) above the HGU of PT. Rigunas Agri Utama where the area is a producing oil palm plant and has been harvested. <p>All of these problems/disputes/grievance have been mediated by the Regent of Tebo through Letter No. 005/1347/Disbun/2016, dated 16 November 2016 and also by the Plantation Office of Tebo Regency through letter No. 525/395/Disbun/2016, dated 28 November 2016.</p> <p>The results of the meeting/mediation concluded that the disputed area would be resolved legally through an inventory of the legality aspects where the collection of 294 community copyrights of ownership certificates (SHM) was issued in 2016 and the HGU of PT. Rigunas Agri Utama will be</p>	Complied

		<p>produced/compared together. In addition, a participatory field check will be carried out to ensure that disputed locations can be traced.</p> <p>On 30 November 2016 a meeting was held with the conclusion that the field checking was postponed after data synchronization was carried out. Data synchronization will be carried out at the Jambi Provincial Office (Kantor Kementerian Agraria dan Tata Ruang/BPN Provinsi Jambi). The Minutes of the Meeting were signed by various parties, including:</p> <ul style="list-style-type: none"> a. Plt. Sekretaris Daerah Kabupaten Tebo b. Kepala Kantor Kesbangpol Kabupaten Tebo c. Kapolsek Serai Serumpun d. KBO Intelkam Polres Tebo e. Kabid Bina Usaha Dinas Perkebunan Tebo f. Kasi Survey, Pengukuran dan Pemetaan BPN Tebo g. Kasi HT&PT BPN Kabupaten Tebo h. Kasi Wasnas Kantor Kesbangpol Kabupaten Tebo i. Kasi Rehabilitasi Kantor LH Kabupaten Tebo j. Kasi Trantib Kecamatan Serai Serumpun k. Staf Dinas Kehutanan Kabupaten Tebo l. GM PT. Rigunas Agri Utama m. Humas PT. Rigunas Agri Utama n. GIS PT. Rigunas Agri Utama <p>On 13 August 2019, a mediation was held which was attended by the Mitra Serumpun Farmer Group (Community), representative of PT. Rigunas Agri Utama management, Police, the Indonesian National Army and the National Land Agency (BPN) with an agenda to discuss conflicts over alleged overlapping of PT. Rigunas Agri Utama's HGU with certificates Community</p>	
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		<p>Ownership Rights (Farmer Groups), and the results of the mediation are contained, as follows:</p> <ol style="list-style-type: none"> a. Whereas on the basis of suggestions and input from the Tebo Regency Police and the Indonesian National Army (TNI), to maintain the conducive security and comfort of the environment at the location of the object of the dispute, PT. Rigunas Agri Utama and the community (Mitra Serumpun Farmer Group) are asked to refrain by not carrying out activities on the land of the disputed object while waiting for a further legal process which has permanent legal force. b. Whereas both parties must maintain security and order of the environment in the object of dispute and not do things that violate the law c. Whereas it was requested to PT. Rigunas Agri Utama to immediately process a Lawsuit application to the State Administrative Court (Pengadilan Tata Usaha Negara). d. Whereas for point (a) above, PT. Rigunas Agri Utama is requested to be able to provide an answer no later than 14 (fourteen) days after receiving this letter. <p>Furthermore, PT. Rigunas Agri Utama has provided responses and answers to the above mediation results on 13 August 2019 through letter No. 06/LG-RIGUNAS/Ext/VIII/19, contains:</p> <ul style="list-style-type: none"> - PT. Rigunas Agri Utama controls and operates a plot of oil palm plantation in Sungai Rambai Village, Tebo Ulu District, Tebo Regency, Jambi Province covering an area of 1,047.354 Ha as referred to in the HGU certificate No. 17 (formerly No.1, 1 May 1997) granted based on the Decree of Minister of Land/Head of National Land Agency No. 51/HGU/BPN/1996 dated 27 November 1996. - That PT. Rigunas Agri Utama hopes that the law enforcement officials can maintain conduciveness from community disturbances that intend to seize, harvest or obstruct PT. Rigunas Agri Utama's plantation activities 	
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		<p>- That the HGU has been owned / controlled and planted with oil palm since 1996 without any claim from the community or from any party.</p> <p>Latest update, PT. Rigunas Agri Utama fulfilled summon letter from Kejaksaan Negeri Tebo "Surat Kejaksaan Negeri Tebo No.R-33/L.S.17/Dek.1/11/2020; Kepada Manager Plasma PT. Rigunas Agri Utama; Perihal Permintaan Keterangan untuk menghadap 17 November 2020; Tanggal 11 November 2020". During the meeting in November 2020, PT. Rigunas Agri Utama ordered to present the copy of HGU. Company representative gave the copy of HGU to Kejaksaan.</p>	
<p>4.8.2</p>	<p>(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.</p>	<p>The company has established a mechanism / procedure for handling land conflicts. Procedure No. AA-GL-5003.1-R1 Rev. 22 August 2011, where it explained that if the conflict resolution did not meet an agreement, then an alternative would be taken through legal or legal channels.</p> <p>Complaints from stakeholders are recorded, the company can prove that all related complaints / complaints from stakeholders have been recorded and monitored for the progress process until the minutes of the meeting and the results of the meeting to discuss these complaints, are taken samples:</p> <p>1) In 2016 there was a land dispute (overlapping) within the HGU area of PT. Rigunas Agri Utama, as follows:</p> <ul style="list-style-type: none"> a. NGO Corruption Monitoring and Rescue of State Assets, Letter No: 002/DPW/PK&PHN/JP/KU/VI/2016, dated 25 June 2016. The letter contains indications that PT. Rigunas Agri Utama is cultivated the land outside HGU. b. The Panglimo Djoenid NGO, Tebo Regency, reported to the local Police (Kabupaten Tebo) with Letter No.11/PDJ/TBO/X/16, dated 28 September 2016. The letter contained reports that a group of residents had a legal ownership certificate (SHM) above the HGU of PT. Rigunas Agri Utama where the area is a producing oil palm plant and has been harvested. 	<p>Complied</p>

		<p>All of these problems/disputes/grievance have been mediated by the Regent of Tebo through Letter No. 005/1347/Disbun/2016, dated 16 November 2016 and also by the Plantation Office of Tebo Regency through letter No. 525/395/Disbun/2016, dated 28 November 2016.</p> <p>The results of the meeting/mediation concluded that the disputed area would be resolved legally through an inventory of the legality aspects where the collection of 294 community copyrights of ownership certificates (SHM) was issued in 2016 and the HGU of PT. Rigunas Agri Utama will be produced/compared together. In addition, a participatory field check will be carried out to ensure that disputed locations can be traced.</p> <p>On 30 November 2016 a meeting was held with the conclusion that the field checking was postponed after data synchronization was carried out. Data synchronization will be carried out at the Jambi Provincial Office (Kantor Kementerian Agraria dan Tata Ruang/BPN Provinsi Jambi). The Minutes of the Meeting were signed by various parties, including:</p> <ol style="list-style-type: none"> a. Plt. Sekretaris Daerah Kabupaten Tebo b. Kepala Kantor Kesbangpol Kabupaten Tebo c. Kapolsek Serai Serumpun d. KBO Intelkam Polres Tebo e. Kabid Bina Usaha Dinas Perkebunan Tebo f. Kasi Survey, Pengukuran dan Pemetaan BPN Tebo g. Kasi HT&PT BPN Kabupaten Tebo h. Kasi Wasnas Kantor Kesbangpol Kabupaten Tebo i. Kasi Rehabilitasi Kantor LH Kabupaten Tebo j. Kasi Trantib Kecamatan Serai Serumpun k. Staf Dinas Kehutanan Kabupaten Tebo l. GM PT. Rigunas Agri Utama m. Humas PT. Rigunas Agri Utama 	
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		<p>n. GIS PT. Rigunas Agri Utama</p> <p>On 13 August 2019, a mediation was held which was attended by the Mitra Serumpun Farmer Group (Community), representative of PT. Rigunas Agri Utama management, Police, the Indonesian National Army and the National Land Agency (BPN) with an agenda to discuss conflicts over alleged overlapping of PT. Rigunas Agri Utama's HGU with certificates Community Ownership Rights (Farmer Groups), and the results of the mediation are contained, as follows:</p> <ol style="list-style-type: none"> a. Whereas on the basis of suggestions and input from the Tebo Regency Police and the Indonesian National Army (TNI), to maintain the conducive security and comfort of the environment at the location of the object of the dispute, PT. Rigunas Agri Utama and the community (Mitra Serumpun Farmer Group) are asked to refrain by not carrying out activities on the land of the disputed object while waiting for a further legal process which has permanent legal force. b. Whereas both parties must maintain security and order of the environment in the object of dispute and not do things that violate the law c. Whereas it was requested to PT. Rigunas Agri Utama to immediately process a Lawsuit application to the State Administrative Court (Pengadilan Tata Usaha Negara). d. Whereas for point (a) above, PT. Rigunas Agri Utama is requested to be able to provide an answer no later than 14 (fourteen) days after receiving this letter. <p>Furthermore, PT. Rigunas Agri Utama has provided responses and answers to the above mediation results on 13 August 2019 through letter No. 06/LG-RIGUNAS/Ext/VIII/19, contains:</p> <ul style="list-style-type: none"> - PT. Rigunas Agri Utama controls and operates a plot of oil palm plantation in Sungai Rambai Village, Tebo Ulu District, Tebo Regency, Jambi Province covering an area of 1,047.354 Ha as referred to in the HGU certificate No. 17 (formerly No.1, 1 May 1997) granted based on the Decree of Minister 	
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		<p>of Land/Head of National Land Agency No. 51/HGU/BPN/1996 dated 27 November 1996.</p> <ul style="list-style-type: none"> - That PT. Rigunas Agri Utama hopes that the law enforcement officials can maintain conduciveness from community disturbances that intend to seize, harvest or obstruct PT. Rigunas Agri Utama's plantation activities - That the HGU has been owned / controlled and planted with oil palm since 1996 without any claim from the community or from any party. <p>Latest update, PT. Rigunas Agri Utama fulfilled summon letter from Kejaksaan Negeri Tebo "Surat Kejaksaan Negeri Tebo No.R-33/L.S.17/Dek.1/11/2020; Kepada Manager Plasma PT. Rigunas Agri Utama; Perihal Permintaan Keterangan untuk menghadap 17 November 2020; Tanggal 11 November 2020". During the meeting in November 2020, PT. Rigunas Agri Utama ordered to present the copy of HGU. Company representative gave the copy of HGU to Kejaksaan.</p> <p>All parties demonstrate effort to seek resolution.</p>	
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).	Based on interview with management, document review and stakeholder consultation, there was no new land acquisition in the scope of certification PT. Rigunas Agri Utama-Bungo Tebo POM and its supply base.	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).	PT. Rigunas Agri Utama has mapped the area accused of overlapping with map "Peta Identifikasi Kepemilikan Lahan" scale 1:43.082. The complainant does not willing to state where their land located.	Complied
<p>Principle 5: Support smallholder inclusion</p> <p>Include smallholders in RSPO supply chains and improve their livelihoods through fair and transparent partnerships.</p> <p>Criteria 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.</p>			

5.1.1	<p>Current and previous period prices for FFB are publicly available and accessible by smallholders.</p>	<p>The FFB price set for the plantation that supplies FFB to Bunga Tebo POM is divided into two, namely outgrowers and Scheme Smallholder FFB. The price outgrower/third parties FFB is determined based on market mechanisms.</p> <p>The price of Scheme Smallholder's FFB is determined based on the FFB Pricing Meeting of the Jambi Provincial Plantation Office, which is updated once a week. For example, for the period 25 September - 1 October 2020 based on the "Results of the Meeting on the Price of Oil Palm FFB for the period 25 September - 1 October 2020", the FFB price is determined on the basis of:</p> <p>a. Average CPO price: IDR 9,230.63/kg. b. Average PK price: IDR 4,360.65/kg. c. "K" index: 87,66%.</p> <p>However, the there is changes in FFB price for scheme smallholder (See 5.1.3)</p> <p>Current and previous FFB price for scheme smallholders are available on the signboard in front of the Mill and informed to the Cooperative.</p> <table border="1" data-bbox="1019 877 1933 1398"> <thead> <tr> <th>Period 2020</th> <th>Planting Age</th> <th>Price (IDR)</th> <th>Period 2021</th> <th>Planting Age</th> <th>Price (IDR)</th> </tr> </thead> <tbody> <tr> <td rowspan="2">3-9 Jan 2020</td> <td>21-24 years</td> <td>1,899.96</td> <td>1 Jan 2021</td> <td>-</td> <td>2,060.00</td> </tr> <tr> <td>25 years</td> <td>1,810.48</td> <td>1 Feb 2021</td> <td>-</td> <td>2,010.00</td> </tr> <tr> <td rowspan="2">10-16 Jan 2020</td> <td>21-24 years</td> <td>2,036.64</td> <td>1 Mar 2021</td> <td>-</td> <td>2,150.00</td> </tr> <tr> <td>25 years</td> <td>1,940.18</td> <td>1 Apr 2021</td> <td>-</td> <td>2,180.00</td> </tr> <tr> <td rowspan="2">17-23 Jan 2020</td> <td>21-24 years</td> <td>2,062.55</td> <td>1 May 2021</td> <td>-</td> <td>2,290.00</td> </tr> <tr> <td>25 years</td> <td>1,965.75</td> <td>1 Jun 2021</td> <td>-</td> <td>2,260.00</td> </tr> <tr> <td rowspan="2">24-30 Jan 2020</td> <td>21-24 years</td> <td>1,956.30</td> <td>1 Jul 2021</td> <td>-</td> <td>1,990.00</td> </tr> <tr> <td>25 years</td> <td>1,863.39</td> <td>1 Aug 2021</td> <td>-</td> <td>2,210.00</td> </tr> <tr> <td>31 Jan-6 Feb 2020</td> <td>21-24 years</td> <td>1,915.22</td> <td>1 Sept 2021</td> <td>-</td> <td>2,2480.00</td> </tr> </tbody> </table>	Period 2020	Planting Age	Price (IDR)	Period 2021	Planting Age	Price (IDR)	3-9 Jan 2020	21-24 years	1,899.96	1 Jan 2021	-	2,060.00	25 years	1,810.48	1 Feb 2021	-	2,010.00	10-16 Jan 2020	21-24 years	2,036.64	1 Mar 2021	-	2,150.00	25 years	1,940.18	1 Apr 2021	-	2,180.00	17-23 Jan 2020	21-24 years	2,062.55	1 May 2021	-	2,290.00	25 years	1,965.75	1 Jun 2021	-	2,260.00	24-30 Jan 2020	21-24 years	1,956.30	1 Jul 2021	-	1,990.00	25 years	1,863.39	1 Aug 2021	-	2,210.00	31 Jan-6 Feb 2020	21-24 years	1,915.22	1 Sept 2021	-	2,2480.00	Complied
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	7-13 Feb 2020	21-24 years	1,774.01			
		25 years	1,689.42			
	14-20 Feb 2020	21-24 years	1,754.30			
		25 years	1,670.18			
	21-27 Feb 2020	21-24 years	1,720.84			
		25 years	1,638.35			
	28 Feb-5 Mar 2020	21-24 years	1,700.14			
		25 years	1,618.66			
	6-12 Mar 2020	21-24 years	1,607.10			
		25 years	1,530.26			
	13-19 Mar 2020	21-24 years	1,496.03			
		25 years	1,424.60			
	20-26 Mar 2020	21-24 years	1,431.24			
		25 years	1,362.76			
	27 Mar-2 Apr 2020	21-24 years	1,472.96			
		25 years	1,402.85			
	3-9 Apr 2020	21-24 years	1,620.43			
		25 years	1,542.90			
	10-16 Apr 2020	21-24 years	1,697.90			
		25 years	1,616.76			
		21-24 years	1,704.10			

		17-23 Apr 2020	25 years	1,622.89				
		24-30 Apr 2020	21-24 years	1,629.10				
			25 years	1,551.68				
		1-7 May 2020	21-24 years	1,488.69				
			25 years	1,417.52				
		8-14 May 2020	21-24 years	1,352.42				
			25 years	1,287.59				
		14-21 May 2020	21-24 years	1,287.43				
			25 years	1,225.77				
		22-28 May 2020	21-24 years	1,284.99				
			25 years	1,223.27				
		29 May-4 Jun 2020	21-24 years	1,310.01				
			25 years	1,247.35				
		5-11 Jun 2020	21-24 years	1,349.81				
			25 years	1,285.34				
		12-18 Jun 2020	21-24 years	1,378.61				
			25 years	1,312.74				
		19-25 Jun 2020	21-24 years	1,384.44				
			25 years	1,318.47				
		26 Jun-2 Jul 2020	21-24 years	1,407.07				
			25 years	1,340.10				

		3-9 Jul 2020	21-24 years	1,443.34			
			25 years	1,374.46			
		10-16 Jul 2020	21-24 years	1,451.43			
			25 years	1,381.82			
		17-23 Jul 2020	21-24 years	1,477.93			
			25 years	1,407.15			
		24-30 Jul 2020	21-24 years	1,545.73			
			25 years	1,471.67			
		31 Jul-6 Aug 2020	21-24 years	1,693.37			
			25 years	1,611.92			
		7-13 Aug 2020	21-24 years	1,699.39			
			25 years	1,617.66			
		14-20 Aug 2020	21-24 years	1,811.92			
			25 years	1,724.67			
		28 Aug-3 Sept 2020	21-24 years	1,828.32			
			25 years	1,740.23			
1 Oct 2020	-	1,820.00					
1 Nov 2020	-	1,900.00					
1 Dec 2020	-	2,000.00					
5.1.2	(C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.	Cooperatives get the information of FFB price from "Tim Penetapan Harga TBS" (FFB pricing team of Jambi Province). The company can demonstrated minutes				Complied	

		<p>of agreed FFB price, "Berita Acara Kesepakatan Harga TBS Petani Plasma" between the company and Cooperatives.</p> <p>Effective 1 September 2020, PT. Rigunas Agri Utama and 18 cooperatives scheme smallholder agreed to use outgrower FFB price for scheme smallholder FFB price. PT. Rigunas explains the FFB pricing for outgrower, now in place.</p>	
<p>5.1.3</p>	<p>(C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.</p>	<p>The smallholder of PT. Rigunas Agri Utama made statement letter, dated 9 March 2020:</p> <ul style="list-style-type: none"> - Smallholder will use FFB price from Dinas Perkebunan for planting age 10-20 years, but if FFB market price higher than FFB price from Dinas Perkebunan, smallholder request for subsidy. - Smallholder refuse to use FFB market price - FFB payment be made on monthly basis <p>In June 2020, scheme smallholder of PT. Rigunas Agri Utama (KUD Sawit Makmur Bersama, KUD Sawit Karya Makmur, KUD Tanjung Dani Sakti, KUD Sumber Usaha, KUD Sumay Jaya, KUD Sejahtera Tani, KUD Sawit Sumay Makmur, KUD Belarik Jaya, KUD Barokah) requested for FFB price from smallholder be similar with outgrower FFB price and payment on weekly basis.</p> <p>The company and scheme smallholders mediated by "Dinas Perkebunan" in meeting on 22 June 2020 and recorded in "Berita Acara Pertemuan Pembahasan Transibility Buah dan Usulan Harga Pembelian Tandan Buah Segar (TBS) Plasma":</p> <ul style="list-style-type: none"> - Cooperatives as member of scheme smallholder of PT. Rigunas Agri Utama request to use FFB price using highest market price - Dinas Perkebunan reminded the scheme smallholder on related government regulation and legal basis of PIR-Trans: "Instruksi Presiden No.1 tahun 1986, Peraturan Menteri Pertanian No.1 tahun 2018" - The cooperatives proposed the FFB price with highest FFB price on the market instead of "Tim Penetapan Harga"/government price. 	<p>Complied</p>

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		<ul style="list-style-type: none"> - The new FFB price determination irreversible up to replanting time. - The cooperatives proposed to have FFB payment on weekly basis <p>Government request for clarification from PT. Rigunas Agri Utama related to the proposal for change in FFB price determination through letter, "Surat Sekretariat Daerah Kabupaten Tebo No.525/492/Disbunakkan/2020; Perihal Usulan Harga Pembelian TBS Plasma", dated 24 June 2020.</p> <ul style="list-style-type: none"> - The purchase of FFB from plasma (scheme smallholder) using the highest market price with reference to government FFB price - Be able to make FFB payment on weekly basis - PT. Rigunas Agri Utama maintain the training and development of scheme smallholders and replanting in sustainable manner. <p>Management responded on 29 August 2020, stating top management agreed the change in FFB price structure</p> <ul style="list-style-type: none"> - Scheme smallholder FFB price refers to outgrower FFB price under SDR - Delivery of smallholder FFB still using delivery order from smallholder group/ Kelompok Tani. - Information on scheme smallholder FFB price update on daily basis. - Implementation of new FFB price scheme effective 1 September 2020 until replanting. The use of new FFB price is binding and irreversible. - Deduction for fertilizer, heavy machinery use divided into 2 times, as per delivery. 	
5.1.4	<p>(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.</p>	<p>On 2 September 2021, PT. Rigunas Agri Utama carried out socialization on potential KKPA (scheme smallholder) of 82 Ha "Tanah Kas Desa" with Koperasi Konsumen Mitra Berkah Bersama and Tuo Sumay village heads. The meeting attended by 20 smallholders.</p> <p>During the meeting, potential smallholder initially agreed with the explanation and arrangement: proposed plan for management and profit sharing 70% (company as managing party) : 30% (smallholder as landowner); cost for legal</p>	Complied

		ownership and license to be calculated as debt; profit sharing shall start at actual mature period; smallholder requested the KUD management fee to be paid through company on 70% portion.	
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe.	<p>Contracts are fair, legal and transparent and have an agreed timeframe, as seen in indicator 2.2.2.</p> <ul style="list-style-type: none"> - Contract for CPO and CPKO transport between PT. Rigunas Agri Utama and CV Teman Setia No.01/X/TS-RAU/2020 dated 1 December 2020. Chapter 2 indicating the effective service provision and timeframe. Chapter 3 stipulated the cost for service provision and tax deduction. Chapter 4 stipulating payment method and timeframe. Chapter 7 stipulated the rights and obligations of each parties. Chapter 10 stipulates force majeure condition. Chapter 11 stipulates contract termination. - Contract for CPO and CPKO transport between PT. Rigunas Agri Utama and CV Jaya Pertama No.01-a/VI/TS-RAU/2020 dated 1 December 2020. Chapter 2 indicating the effective service provision and timeframe. Chapter 3 stipulated the cost for service provision and tax deduction. Chapter 4 stipulating payment method and timeframe. Chapter 7 stipulated the rights and obligations of each parties. Chapter 10 stipulates force majeure condition. Chapter 11 stipulates contract termination. - Perjanjian Pengangkutan No.154/E3KBT/03/21 between PT. Rigunas Agri Utama and Padli, signed on 1 March 2021. The scope of work for transport of seedling, topsoil and stone. Chapter 1 stipulates the scope of work. Chapter 3 stipulating the timeframe and handover. Chapter 5 stipulating the cost for service provision. Chapter 6 stipulating payment method, administrative requirement and payment timeframe. Chapter 7 indicating the rights and obligations. <p>Perjanjian Borongan No.044/E3KBT/01/21 between PT. Rigunas Agri Utama and Dedi Saputra Siregar, signed on 1 January 2021. The scope of work for transport school children/school bus operation. Chapter 1 stipulates the scope of work and operation area. Chapter 3 stipulating the cost of service provision.</p>	Complied

		Chapter 4 stipulating the payment method and timeframe. Chapter 9 indicating the rights and obligations.	
5.1.6	(C) Agreed payments are made in a timely manner and receipts specifying price, weigh, deductions and amount paid are given.	<p>Payments are made in timely manner and receipts specifying price, weight, deductions and amount paid are available.</p> <p>Sample seen:</p> <p>"Rekap Pembayaran TBS Plasma Per KT" period 12 – 18 Oct 2020.</p> <p>1. Cooperative: Koperasi Tanjung Dani Sakti</p> <p>a. Farmer Group: D16001 / KT-20 Tanjung Dani</p> <p>b. Bank: BRI Muaro Tebo</p> <p>c. Total FFB: 37,220 kg</p> <p>d. Gross payment: IDR 69,229,200</p> <p>e. Deduction: 0</p> <p>f. Nett payment: IDR 69,229,20.</p> <p>2. Cooperative: Sumay Jaya</p> <p>a. Farmer Group: D12005 / KT-30 Salak Sekilan</p> <p>b. Bank: BRI Rimbo Bujang</p> <p>c. Total FFB: 16,002 kg</p> <p>d. Gross payment: IDR 29,633,160</p> <p>e. Deduction: IDR 3,452,200 (fertilizer)</p> <p>f. Nett payment: IDR 26,180,960.</p> <p>3a. FFB supplier: PDASAN Jaya</p> <p>a. Bank: BRI Unit Muara Tebo</p> <p>b. Total FFB: 29,392 kg (period January 2021) at price IDR 2,075/kg</p>	Complied

		<p>c. Gross payment: IDR 61,135,360 d. Tax VAT 10%: IDR 6,113,536 e. Nett payment: IDR 67,248,896</p> <p>3b. FFB supplier: PDASAN Jaya a. Bank: BRI Unit Muara Tebo b. Total FFB: 23,730 kg (period September 2021) at price IDR 2,534/kg c. Gross payment: IDR 60,274,200 d. Tax VAT 10%: IDR 6,027,420 e. Nett payment: IDR 66,301,620</p> <p>4. FFB supplier: UD Royal a. Bank: Mandiri Cabang Muaro Jambi b. Total FFB: 51,792 kg (period December 2020) at price IDR 1,786/kg c. Gross payment: IDR 92,707,680 d. Tax VAT 10%: IDR 9,270,768 e. Nett payment: IDR 101,978,448</p>	
5.1.7	Weighing equipment is verified by an independent third party on a regular basis.	<p>There are two weighbridge used in Bungo Tebo POM, calibration in 2020:</p> <ol style="list-style-type: none"> Brand: Avery Weigh Tronix; Type E1205; Serial Number 073550245 (T-1); Capacity 50,000 kg; has been calibrated based on "Surat Keterangan Hasil Pengujian" No.510.31/733/DPP/Met/SKHP/VI/ 2020 dated 26 June 2020. Brand: Presica; Type PSC 6801S; Serial Number 00231; Capacity 60,000 kg; has been calibrated based on "Surat Keterangan Hasil Pengujian" No.511/41/DKUKMPP-Met/SKHP/II/ 2020 dated 14 February 2020. <p>Calibration in 2021:</p>	Complied

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		<p>1. Brand: Avery Weigh Tronix; Type E1205; Serial Number 073550245 (T-1); Capacity 50,000 kg; has been calibrated on 1 November 2021, certificate on process.</p> <p>2. Brand: Presica; Type PSC 6801S; Serial Number 00231; Capacity 60,000 kg; has been calibrated based on "Surat Keterangan Hasil Pengujian" No.510.3/03/DISPERINDAGNAKER-MET/SKHP/II/2021 dated 10 February 2021 and due 9 February 2022.</p>	
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.	On 2 September 2021 carried out socialization on potential KKPA (scheme smallholder) of 82 Ha "Tanah Kas Desa" with Koperasi Konsumen Mitra Berkah Bersama and Tuo Sumay village heads. During the meeting, the potential smallholder express interest to go for certification.	Complied
5.1.9	(C) The unit of certification has a grievance mechanism for smallholders, and all grievances raised are dealt with in a timely manner.	<p>The company has established mechanism for handling grievance from external party as in "Mekanisme Penanganan Keluhan Stakeholder" dated 22 April 2019. Smallholders are include as external in the mechanism.</p> <p>Notebook record KUD Sumber Usaha sampled inquiry on 21 June 2021; Lawi (smallholder) request information for current FFB. Company responded on same day, FFB price informed through KUD at IDR 2,030.</p> <p>Notebook record KUD Tanjung Dani Sakti sampled inquiry on 11 February 2021; F. Sianipar (smallholder) asking information on pest in oil palm plantation. Company responded on 13 February 2021, information on pest and disease in oil palm plantation informed through "Kelompok Tani"/smallholder group KT19.</p> <p>Notebook record KUD Sawit Sumay Makmur, sampled complaint on 2 July 2021; Baihaki (smallholder) request for loader (heavy machinery) for repair road condition in KT 01. Responded on 5 July 2021 stating heavy machinery backhoe loader will be assigned to KT01.</p>	Complied

		<p>Notebook record KUD Sawit Tambara Jaya, sampled inquiry on 4 September 2021; Ridwan (smallholder) request information of opening and closing time of Bungo Tebo POM. Company responded on same day the opening and closing time of Bungo Tebo POM.</p> <p>Notebook record KUD Tanjung Aur Duri, sampled complaint on 9 May 2021; M. Rozi (smallholder) request for loader (heavy machinery) for repair road condition in KT 122. Responded on 11 May 2021 stating heavy machinery backhoe loader will be assigned to KT122.</p> <p>The company has also provide channel to report to report if there is violation to the principles and objectives, through email whistleblow@rgei.com or phone (62) 81 2755 2528.</p>	
Criteria 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification.	<p>Bungo Tebo Estate and Mill:</p> <p>PT RAU has a partnership cooperation program with village oil palm farmers around the plantations as "Program Kemitraan Plasma/Scheme smallholder" with a cooperative of 18 oil palm farmer cooperatives, as follow:</p> <ol style="list-style-type: none"> 1. Koperasi Tanjung Dani Sakti 2. Koperasi Sumay Jaya 3. Koperasi Sumber Usaha 4. Koperasi Bina Tani 5. Koperasi Belarik Jaya 6. Koperasi Sawit Tambara Jaya 7. Koperasi Tunas Harapan 8. Koperasi Sejahtera Tani 9. Koperasi Tani Mandiri 10. Koperasi Tanjung Jaya Bersama 11. Koperasi Tanjung Aur Duri 	Complied

		<p>12. Koperasi Sawit Sumay Makmur 13. Koperasi Sawit Makmur 14. Koperasi Barokah 15. Koperasi Sawit Keluarga Sejahtera 16. Koperasi Sawit Makmur Bersama 17. Koperasi Sawit Karya Makmur 18. Koperasi Sawit Tanduk Perkasa</p> <p>These 18 cooperatives are spread in 11 villages around the PT RAU’s plantation (Desa Tuo Sumay, Desa Teriti, Desa Kandang, Desa Pinang Belai, Desa Sekutur Jaya, Desa Bukit Pamuatan, Desa Napal Putih, Desa Sako Makmur, Desa Bungo Tanjung, Desa Tambun Arang, Desa Jati Belarik), so that the oil palm farmers around the PT RAU plantation are members of the Plasma (Scheme smallholder) and the rest are community rubber plantations. So that this is an inclusive smallholder from PT RAU and has been included in the scope of RSPO certification since 2016. Guidance for plasma oil palm farmers is routinely carried out by PT RAU every year, including through:</p> <ul style="list-style-type: none"> - Training in Preparation for Certification, will be held in April-May 2021. - Smallholder Coordination Meeting, will be held in June-September 2021 - Making an Appeal Sign, carried out in May 2021 - Project to making owl cages assistance, implemented in May 2021 - Road Repair Assistance, will be implemented in April-May 2021. - Renovation assistance and Cooperative Office Equipment, has implemented in April-May 2021. - Mengadakan studi banding ke Jogya (agribisnis center) untuk peningkatan pendapatan alternatif selian perkebunan kelapa sawit <p>The realization PT RAU Plasma development program up to October 2021, as follow:</p>	
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		<ul style="list-style-type: none"> - Farmer Training in Certification Preparation was carried out on February 7, 2021 - Independent Smallholder Coordination Meetings are held 2 times a year, the last one was in February 2021 - Making an Appeal Sign, in October 2019 - Making of owl cages assistance: Pilot owl cage in November 2020 - Road Repair Assistance in November 2020 <p>In the 2020-2021 period, PT RAU has planned a palm oil development program for the surrounding community by establishing a KKPA scheme in Tuo Sumay Village covering an area of 375 hectares through the Mitra Berkah Bersama Consumer Cooperative. Socialization of the profit sharing 70:30 TKD pattern partnership with prospective KKPA farmers Tuo Sumay – PT Rigunas Agri Utama has been carried out on September 2, 2021.</p>	
5.2.2	<p>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>	<p>Bungo Tebo Estate and Mill:</p> <p>PT RAU has a partnership cooperation program with village oil palm farmers around the plantations as “Program Kemitraan Plasma/Scheme smallholder” with a cooperative of 18 oil palm farmer cooperatives, as follow:</p> <ol style="list-style-type: none"> 1. Koperasi Tanjung Dani Sakti 2. Koperasi Sumay Jaya 3. Koperasi Sumber Usaha 4. Koperasi Bina Tani 5. Koperasi Belarik Jaya 6. Koperasi Sawit Tambara Jaya 7. Koperasi Tunas Harapan 8. Koperasi Sejahtera Tani 9. Koperasi Tani Mandiri 10. Koperasi Tanjung Jaya Bersama 	Complied

		<ol style="list-style-type: none"> 11. Koperasi Tanjung Aur Duri 12. Koperasi Sawit Sumay Makmur 13. Koperasi Sawit Makmur 14. Koperasi Barokah 15. Koperasi Sawit Keluarga Sejahtera 16. Koperasi Sawit Makmur Bersama 17. Koperasi Sawit Karya Makmur 18. Koperasi Sawit Tanduk Perkasa <p>These 18 cooperatives are spread in 11 villages around the PT RAU’s plantation (Desa Tuo Sumay, Desa Teriti, Desa Kandang, Desa Pinang Belai, Desa Sekutur Jaya, Desa Bukit Pamuatan, Desa Napal Putih, Desa Sako Makmur, Desa Bungo Tanjung, Desa Tambun Arang, Desa Jati Belarik), so that the oil palm farmers around the PT RAU plantation are members of the Plasma (Scheme smallholder) and the rest are community rubber plantations. So that this is an inclusive smallholder from PT RAU and has been included in the scope of RSPO certification since 2016. Guidance for plasma oil palm farmers is routinely carried out by PT RAU every year, including through:</p> <ul style="list-style-type: none"> - Training in Preparation for Certification, will be held in April-May 2021. - Smallholder Coordination Meeting, will be held in June-September 2021 - Making an Appeal Sign, carried out in May 2021 - Project to making owl cages assistance, implemented in May 2021 - Road Repair Assistance, will be implemented in April-May 2021. - Renovation assistance and Cooperative Office Equipment, has implemented in April-May 2021. - Mengadakan studi banding ke Jogya (agribisnis center) untuk peningkatan pendapatan alternatif selian perkebunan kelapa sawit 	
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5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	<p>Bungo Tebo Estate and Mill:</p> <p>PT RAU has a partnership cooperation program with village oil palm farmers around the plantations as “Program Kemitraan Plasma/Scheme smallholder” with a cooperative of 18 oil palm farmer cooperatives, as follow:</p> <ol style="list-style-type: none"> 1. Koperasi Tanjung Dani Sakti 2. Koperasi Sumay Jaya 3. Koperasi Sumber Usaha 4. Koperasi Bina Tani 5. Koperasi Belarik Jaya 6. Koperasi Sawit Tambara Jaya 7. Koperasi Tunas Harapan 8. Koperasi Sejahtera Tani 	Complied

		<ol style="list-style-type: none"> 9. Koperasi Tani Mandiri 10. Koperasi Tanjung Jaya Bersama 11. Koperasi Tanjung Aur Duri 12. Koperasi Sawit Sumay Makmur 13. Koperasi Sawit Makmur 14. Koperasi Barokah 15. Koperasi Sawit Keluarga Sejahtera 16. Koperasi Sawit Makmur Bersama 17. Koperasi Sawit Karya Makmur 18. Koperasi Sawit Tanduk Perkasa <p>These 18 cooperatives are spread in 11 villages around the PT RAU’s plantation (Desa Tuo Sumay, Desa Teriti, Desa Kandang, Desa Pinang Belai, Desa Sekutur Jaya, Desa Bukit Pamuatan, Desa Napal Putih, Desa Sako Makmur, Desa Bungo Tanjung, Desa Tambun Arang, Desa Jati Belarik), so that the oil palm farmers around the PT RAU plantation are members of the Plasma (Scheme smallholder) and the rest are community rubber plantations. So that this is an inclusive smallholder from PT RAU and has been included in the scope of RSPO certification since 2016. Guidance for plasma oil palm farmers is routinely carried out by PT RAU every year, including through:</p> <ul style="list-style-type: none"> - Training in Preparation for Certification, will be held in April-May 2021. - Smallholder Coordination Meeting, will be held in June-September 2021 - Making an Appeal Sign, carried out in May 2021 - Project to making owl cages assistance, implemented in May 2021 - Road Repair Assistance, will be implemented in April-May 2021. - Renovation assistance and Cooperative Office Equipment, has implemented in April-May 2021. 	
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		<ul style="list-style-type: none"> - Mengadakan studi banding ke Jogja (agribisnis center) untuk peningkatan pendapatan alternatif selain perkebunan kelapa sawit <p>The realization PT RAU Plasma development program up to October 2021, as follow:</p> <ul style="list-style-type: none"> - Farmer Training in Certification Preparation was carried out on February 7, 2021 - Independent Smallholder Coordination Meetings are held 2 times a year, the last one was in February 2021 - Making an Appeal Sign, in October 2019 - Making of owl cages assistance: Pilot owl cage in November 2020 - Road Repair Assistance in November 2020 <p>In the 2020-2021 period, PT RAU has planned a palm oil development program for the surrounding community by establishing a KKPA scheme in Tuo Sumay Village covering an area of 375 hectares through the Mitra Berkah Bersama Consumer Cooperative. Socialization of the profit sharing 70:30 TKD pattern partnership with prospective KKPA farmers Tuo Sumay – PT Rigunas Agri Utama has been carried out on September 2, 2021.</p>	
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	<p>Bungo Tebo Estate and Mill:</p> <p>PT RAU has a partnership cooperation program with village oil palm farmers around the plantations as “Program Kemitraan Plasma/Scheme smallholder” with a cooperative of 18 oil palm farmer cooperatives, as follow:</p> <ol style="list-style-type: none"> 1. Koperasi Tanjung Dani Sakti 2. Koperasi Sumay Jaya 3. Koperasi Sumber Usaha 4. Koperasi Bina Tani 5. Koperasi Belarik Jaya 6. Koperasi Sawit Tambara Jaya 	

		<ol style="list-style-type: none"> 7. Koperasi Tunas Harapan 8. Koperasi Sejahtera Tani 9. Koperasi Tani Mandiri 10. Koperasi Tanjung Jaya Bersama 11. Koperasi Tanjung Aur Duri 12. Koperasi Sawit Sumay Makmur 13. Koperasi Sawit Makmur 14. Koperasi Barokah 15. Koperasi Sawit Keluarga Sejahtera 16. Koperasi Sawit Makmur Bersama 17. Koperasi Sawit Karya Makmur 18. Koperasi Sawit Tanduk Perkasa <p>These 18 cooperatives are spread in 11 villages around the PT RAU's plantation (Desa Tuo Sumay, Desa Teriti, Desa Kandang, Desa Pinang Belai, Desa Sekutur Jaya, Desa Bukit Pamuatan, Desa Napal Putih, Desa Sako Makmur, Desa Bungo Tanjung, Desa Tambun Arang, Desa Jati Belarik), so that the oil palm farmers around the PT RAU plantation are members of the Plasma (Scheme smallholder) and the rest are community rubber plantations. So that this is an inclusive smallholder from PT RAU and has been included in the scope of RSPO certification since 2016. Guidance for plasma oil palm farmers is routinely carried out by PT RAU every year, including through:</p> <ul style="list-style-type: none"> - Training in Preparation for Certification, will be held in April-May 2021. - Smallholder Coordination Meeting, will be held in June-September 2021 - Making an Appeal Sign, carried out in May 2021 - Project to making owl cages assistance, implemented in May 2021 - Road Repair Assistance, will be implemented in April-May 2021. 	
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		<ul style="list-style-type: none"> - Renovation assistance and Cooperative Office Equipment, has implemented in April-May 2021. - Mengadakan studi banding ke Jogja (agribisnis center) untuk peningkatan pendapatan alternatif selain perkebunan kelapa sawit <p>The realization PT RAU Plasma development program up to October 2021, as follow:</p> <ul style="list-style-type: none"> - Farmer Training in Certification Preparation was carried out on February 7, 2021 - Independent Smallholder Coordination Meetings are held 2 times a year, the last one was in February 2021 - Making an Appeal Sign, in October 2019 - Making of owl cages assistance: Pilot owl cage in November 2020 - Road Repair Assistance in November 2020 <p>In the 2020-2021 period, PT RAU has planned a palm oil development program for the surrounding community by establishing a KKPA scheme in Tuo Sumay Village covering an area of 375 hectares through the Mitra Berkah Bersama Consumer Cooperative. Socialization of the profit sharing 70:30 TKD pattern partnership with prospective KKPA farmers Tuo Sumay – PT Rigunas Agri Utama has been carried out on September 2, 2021.</p>	
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	<p>These 18 cooperatives are spread in 11 villages around the PT RAU’s plantation (Desa Tuo Sumay, Desa Teriti, Desa Kandang, Desa Pinang Belai, Desa Sekutur Jaya, Desa Bukit Pamuatan, Desa Napal Putih, Desa Sako Makmur, Desa Bungo Tanjung, Desa Tambun Arang, Desa Jati Belarik), so that the oil palm farmers around the PT RAU plantation are members of the Plasma (Scheme smallholder) and the rest are community rubber plantations. So that this is an inclusive smallholder from PT RAU and has been included in the scope of RSPO certification since 2016. Guidance for plasma oil palm farmers is routinely carried out by PT RAU every year, including through:</p> <ul style="list-style-type: none"> - Training in Preparation for Certification, will be held in April-May 2021. 	Complied

		<ul style="list-style-type: none"> - Smallholder Coordination Meeting, will be held in June-September 2021 - Making an Appeal Sign, carried out in May 2021 - Project to making owl cages assistance, implemented in May 2021 - Road Repair Assistance, will be implemented in April-May 2021. - Renovation assistance and Cooperative Office Equipment, has implemented in April-May 2021. - Mengadakan studi banding ke Jogya (agribisnis center) untuk peningkatan pendapatan alternatif selian perkebunan kelapa sawit <p>The realization PT RAU Plasma development program up to October 2021, as follow:</p> <ul style="list-style-type: none"> - Farmer Training in Certification Preparation was carried out on February 7, 2021 - Independent Smallholder Coordination Meetings are held 2 times a year, the last one was in February 2021 - Making an Appeal Sign, in October 2019 - Making of owl cages assistance: Pilot owl cage in November 2020 - Road Repair Assistance in November 2020 <p>In the 2020-2021 period, PT RAU has planned a palm oil development program for the surrounding community by establishing a KKPA scheme in Tuo Sumay Village covering an area of 375 hectares through the Mitra Berkah Bersama Consumer Cooperative. Socialization of the profit sharing 70:30 TKD pattern partnership with prospective KKPA farmers Tuo Sumay – PT Rigunas Agri Utama has been carried out on September 2, 2021.</p> <p>At this time there is no agreement (MoU) between prospective oil palm farmers and PT RAU. To strive for the success of this collaboration, PT RAU is pursuing the land legality requirements of prospective oil palm farmers for the KKPA program by identifying the legality of prospective farmers and then</p>	
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		coordinating with the relevant agencies (BPN, DLH and Disbun. Tebo Regency).	
Principle 6: respect workers' rights and conditions Protect workers' rights and ensure safe and decent working conditions.			
Criteria 6.1: Any form of discrimination is prohibited.			
6.1.1	(C) A publicity available non-discrimination and equal opportunity policy is implemented in such way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.	Bungo Tebo POM and Estate: The company has Equal Opportunities policy "Kebijakan Perusahaan", dated 1st December 2019 stated: "To treat equal for all employee in term of recruitment, work performance, and representative without discrimination on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age". The company policy is available on notice board. Based on interview with workers, during stakeholder consultation, it was noted that worker has a basic understanding of company policy related to code of ethical conduct. List of attendance on refresh the socialization of Company Policy "Kebijakan Perusahaan", e.g: <ul style="list-style-type: none"> - On 2 September 2021 location in Bungo Tebo Estate Division IV was attended by 29 workers - On 3 September 2021 location in Bungo Tebo Estate Division III was attended by 25 workers - On 21 September 2021 location in Bungo Tebo Estate Division I, and II was attended by 57 workers - On 10 September 2021 location in Bungo Tebo Mill and attended by 25 workers. Scheme smallholder:	Complied

		<p>The scheme smallholder has set a policy for each cooperative. This Cooperative Policy has established policies related to:</p> <ul style="list-style-type: none"> - Fulfilments of legal requirements that apply in the implementation of activities in cooperatives - Ethical conduct in doing business in all business transactions and operations - Respect human rights by treating all KUD employees and farmers fairly - Forbid minors to work in every activity - Prevent sexual harassment and various forms of violence against women - Respect every KUD employee or farmer to form or become a member of a trade union and ensure the confidentiality of the reporter (Whistle-blower) - Respect human rights defenders (HRD) without giving threats and intimidation - Do not provide work under threats, sanctions or penalties where workers do not have the freedom to agree to the implementation of the work. <p>KUD Sawit Sumay Makmur Cooperative Policy, which was published on 5 January 2021 and this policy has been socialized to all its members on 5 January 2021; Sawit Makmur Cooperative Policy has set on 5 January 2021 and has been socialized to all its farmers' member on 6 January 2021; Belarik Jaya Cooperative Policy has set on 4 January 2021 and has been socialized to all its farmers' member on 4 January 2021; Sawit tambara Jaya Cooperative Policy has set on 4 January 2021 and has been socialized to all its farmers' member on 4 January 2021.</p>	
6.1.2	<p>(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against. Evidence includes migrant workers non-payment of recruitment fees.</p>	<p>Bungo Tebo POM, Estate and Scheme Smallholder: Worker register for mill and estates mentioned that all workers came from different backgrounds (race, religion, gender, etc). Ethnical diversity of worker</p>	Complied

		<p>and during interview with workers, no discrimination was identified based on religion, ethnic, gender. No evidence of discrimination found during the audit. Company provided working tools to the workers, relevant to the nature of the work performed.</p> <p>Based on interviews with several workers during this audit, it was stated by the workers that PT RAU had treated its employees fairly or there was no discrimination and there were no fees charged at the time of employee recruitment.</p>	
6.1.3	<p>The unit of certification demonstrates that the recruitment selection, hiring access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p>	<p>Bungo Tebo POM, Estate and Scheme Smallholder:</p> <p>Company has an SOP related to new employment recruitment. According on SOP Rekrutment dan Seleksi Karyawan No. SOP: AA-HR-305.2-R0 dated 1 February 2009 regarding "<i>Penerimaan Karyawan Baru</i>" (Requitment and Selection of Employee), the company will accept new employee based on their capabilities and qualifications. This procedure ware communicated to all employees in the workplace and stakeholders as well on November 2019.</p> <p>There are two types of employees that are applied in PT RAU, which are permanent employees (known as SKU-B and SKU-H) and daily workers (known as BHL/PHL). Worker register for mill and estates mentioned that all workers came from different backgrounds (race, religion, gender, etc). Ethnical diversity of worker and during interview with workers, no discrimination was identified based on religion, ethnic, gender. No evidence of discrimination found during the audit.</p> <p>Fixed Employee (SKU-H and SKU-B) is confirmed under the joint work Agreement (PKB), while the Daily worker with the daily work agreement with a minimum validity period of 1 year.</p> <p>Based on interview with the HR Dept., that recruitment of employees is based on an analysis of workforce needs and within it has considered, the required competencies, experience and expertise required. For this reason, employee acceptance tests and interviews will be conducted. Employee assessments are always carried out every 6 months as a basis for being able to promote</p>	Complied

		<p>positions or levels/groups which will affect to the monthly salary.</p> <p>In the 2021 period, there are no recruitment in the Bungo Tebo Estate, only at the Bungo Tebo Mill there are seven employee recruitments. Taken example of recruitment at Bungo Tebo Mill on period 2021 and promotion of permanent employee on Bungo Tebo Mill:</p> <ul style="list-style-type: none"> - Recruitment in July 2021, on behalf of Rika Aprianti SE. Application letter dated July 5, 2021, on behalf of Rika Aprianti SE. Along with the required documents including: KTP, Family Card, copy of S1 diploma and transcript. The interview process was held on 12 July 2021 and a health check was carried out by the Clinic on the Bungo Tebo Estate (dr. Yudi Chandra) and was declared healthy. PHL Work Agreement on behalf of Rika Aprianti dated July 28, 2021. <p>Employee promotion, based on Internal Memorandum of RH. Plantation 3 No. 0328/HR-RO3/MEMO/SK/10/2021 dated 27 October 2021, on behalf of Adi Saputra as Spraying Foreman at Bungo Tebo Estate, promotion from temporary worker (BHL) level to permanent workers (SKUH) starts from 1 November 2021.</p>	
6.1.4	<p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p>	<p>Bungo Tebo POM, Estate and Scheme Smallholder:</p> <p>As it is found in company policy "Kebijakan Perusahaan Asian Agri" that was signed by Managing Director (Mr. Kelvin Tio) updated on 1st December 2019, point 15 of the policy stated that Asian Agri committed to: "Prevent sexual harassment and various types of violence against women and protect their reproductive rights".</p> <p>There is a gender committee actively meets and discussing general agenda and other issue related to handling sexual harassment, dissemination of sexual harassment prevention.</p> <p>Based on interview with Gender Committee, company has implemented the protection of women reproductive rights, in form of maternal leave, period leave, and regular pregnancy check for female sprayers and strictly prohibit pregnant and/or breastfeeding female worker applying pesticides. The last</p>	Complied

		<p>pregnancy checks on 8 September 2021; in Afdeling I: 33 workers, Afdeling II as many 33 workers, Afdeling III as many 41 workers, Afdeling IV as many 21 workers. This worker is a female worker who is included in the fertilization and spraying group (TUS) and the result is "negative".</p> <p>When in pregnancy checking there are confluence workers who stated "positive", then based on the company's policy above, the woman workers to be transferred to other work whice not related to chemistry (spray or fertilizing).</p>	
6.1.5	<p>(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p>	<p>Bungo Tebo POM, Estate and Scheme Smallholder:</p> <p>The company has formed a Gender Committee at Bungo Tebo Estate and Mill which is chaired by Ms. Nurbaiti and Ms. Reni Sri Wahyuni as a secretary, based on the Gender Committee Organizational Structure as of 21 January 2020. Coordinators are assigned at each Afdeling; Afdeling 1: Ms. Rahma Julita, Afdeling 2-4: there is no one yet.</p> <p>The Chair of the Gender Committee has established a Work Program for the period 2021, including:</p> <ol style="list-style-type: none"> 1. Women's Special Activities, including: <ul style="list-style-type: none"> • Health Counseling During the COVID-19 Pandemic will be held in September 2021. • Reproductive health education for female employees will be held in September 2021 • Reproductive health checks for female employees in collaboration with the medical team from the local Health Office. 2. Communication with the company regarding employee complaints, including: <ul style="list-style-type: none"> • Conduct regular meetings at least once a year with the Company's management to find solutions to existing employee problems • If there are cases related to employees directly communicate with 	Complied

		<p>the Company's management to find a solution</p> <p>3. Strengthening Organizational Institutions, including:</p> <ul style="list-style-type: none"> • Meeting members at least once a year to discuss organizational development, • Management participates in training organized by the Government and the Company to add and improve insight skills • Coordinate with SPSI to help with complaints related to female employees <p>The regular monthly gender committee meeting was held on 16 April 2021 which discussed Complaints: Elementary school students find it difficult to follow lessons that are conducted online. Mothers also feel overwhelmed accompanying their children to participate in the teaching and learning process. Management Response: Management approved the proposed teaching and learning process to be carried out directly by dividing the student's entry cycle. Students will come to class every 2 days. All students are divided into 2 groups and take turns entering the class.</p> <p>Gender Committee meeting on 13 July 2021; Discussion and Discussion</p> <p>Complaints: there are still many children and also mothers in employee housing still not wearing masks (during the Covid-19 pandemic) when doing activities in the housing environment. Management responses: Management through clinics and doctors conduct awareness to housewives to understand the importance of using masks even though they are active in a residential environment. So that mothers can also remind each other to use masks</p> <p>Based on the records of the routine meeting and interviews with management, that during the period 2020-2021 there were no cases related to women workers.</p>	
6.1.6	There is evidence of equal pay for the same work scope.	<p>Bungo Tebo POM and Estate:</p> <p>Company pays workers wages base on Decree of Gubernur of Jambi SK ccno. 883/KEP.GUB/DISNAKERTRANS-3.3, dated 2 November 2020; regarding:</p>	Complied

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“Penetapan Upah Minimum Provinsi Jambi Tahun 2021” amounting IDR 2,630,162.13 per month. The company composes the structure and scale of the 2020 wage period based on Permenaker No. 1 of 2017. This wage scale structure is a determination of the amount of wages for permanent workers (SKU-B/PB) based on class, rank/position.

Skala Gaji Pegawai Bulanan 2021 - Jambi

Golongan		1	2	3	4	5	6	7	8
PBI-1	A	3.322.686	3.332.686	3.342.686	3.352.686	3.362.686	3.372.686	3.382.686	3.392.686
PBI-2	B	3.242.686	3.252.686	3.262.686	3.272.686	3.282.686	3.292.686	3.302.686	3.312.686
PBI-3	C	3.162.686	3.172.686	3.182.686	3.192.686	3.202.686	3.212.686	3.222.686	3.232.686
PB-1	D	3.082.686	3.092.686	3.102.686	3.112.686	3.122.686	3.132.686	3.142.686	3.152.686
PB-2	E	3.002.686	3.012.686	3.022.686	3.032.686	3.042.686	3.052.686	3.062.686	3.072.686
PB-3	F	2.922.686	2.932.686	2.942.686	2.952.686	2.962.686	2.972.686	2.982.686	2.992.686
PB-4	G	2.842.686	2.852.686	2.862.686	2.872.686	2.882.686	2.892.686	2.902.686	2.912.686

The Company set wage for BHL (Daily workers) and PKWT employees (certain time workers) based the government Memorandum no. 001/HR-R03/MEMO/01/2020, dated 09 January 2020; regarding: “Upah Pekerja Golongan SKUB”. This memorandum also determines the wage structure for each worker’s level (SKU-H and SKU-B). The company provides slip salary to employees together with the salary. The salary slip details the basic salary, allowances, premium, labor health coverage (BPJS Ketenagakerjaan and Kesehatan) and deduction.

PT RAU has established a premium system for harvest wages based on Memorandum No. 004/AA/DMD/MEMO/AUG/21 dated August 16, 2021, explained that the current FFB harvesting, this change is made to more wholesale premiums, pick up loose fruit premiums and tree height premiums, as follows:

premi brondolan

Umur Tanaman	Kriteria Topografi								
	Datar bergelombang			Bergelombang berbukit			Berbukit Bergunung		
	Before	After	Up	Before	After	Up	Before	After	Up
< 10 tahun	50	75	50%	50	75	50%	50	75	50%
10 - 15 tahun	50	75	50%	50	75	50%	50	100	100%
15 - 20 tahun	50	75	50%	50	100	100%	50	100	100%
≥ 20 tahun	50	100	100%	50	100	100%	50	100	100%

Premi lebih borong

Perubahan untuk premi lebih borong :

Range BJR	Kriteria Topografi								
	Datar bergelombang			Bergelombang berbukit			Berbukit Bergunung		
	Before	After	Up	Before	After	Up	Before	After	Up
< 15 kg	637	637	0%	680	680	0%	778	778	0%
15 - 20 Kg	832	832	0%	896	896	0%	1,080	1,242	15%
20 - 25 kg	1,199	1,199	0%	1,253	1,441	15%	1,350	1,620	20%
25 - 27 Kg	1,350	1,553	15%	1,426	1,711	20%	1,544	1,931	25%
≥ 27 kg	1,544	1,776	15%	1,642	1,970	20%	1,804	2,255	25%

3. Premi pokok tinggi

Umur Tanaman	Before	After	Up
20 - 22 tahun	125	188	50%
23 - 25 tahun	150	225	50%
≥ 26 tahun	200	300	50%

Based on the above wage determination, PT RAU has determined wages in accordance with the situation and conditions of the scope of work in accordance with the laws and regulations.

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).			
6.2.1	<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>The company have established work agreement for permanent employees through joint work agreement (PKB-Perjanjian Kerja Bersama) in term for 2 years. During the audit the PKB is for period of 2018 – 2020 and was registered with Dirjen PHI/JSK the Ministry of Employment on 4 July 2018. The new PKB has not yet been issued because it is still in the process of discussing and negotiating the Sumatran regional trade union (BKSPPS) with company associations. Since the new PKB has not been issued, the previous existing PKB is remain used. The company has set employment provisions in accordance with the rules and legal requirement. It is stated on employment contract off daily labour on article 1 about the types of work, working hours (maximum 40 hours per week and working from Monday to Saturday) and the wages has provides is based on waging regulation (Decree of Governor of North Sumatera) in effect at January 2020. Statements about wages, stated in PKB in Article V concerning Wages-Upah; stated: <i>"Pekerja harian Tetap dan Pekerja Bulanan diberi upah berupa uang yang ditetapkan berdasarkan kesepakatan bersama dengan BKS-PPS dengan PD.FSP.PP-SPSi Propinsi yang bersangkutan sesuai dengan peraturan perundangan Otonomi Daerah yang berlaku, yaitu upah uang ditambah beras pekerja senilai/sejumlah 15 Kg (Upah BKS-PPS), dengan mengingat situasi ekonomi dan kemampuan perusahaan"</i>.</p> <p>The Joint working Agreement (PKB 2018-2020 period) and the daily labour contract of the wage was presented in Bahasa Indonesia, so all employees can understand it and this PHL work agreement is handed over to the workers concerned after being described by the management (through KTU), so that employees who can not read the writing can understood.</p> <p>Determination of wage for period 2021 is based on Decree of Gubernur of Jambi SK no. 883/KEP.GUB/DISNAKERTRANS-3.3/2020, dated 2 November 2020; regarding: "Penetapan Upah Minimum Provinsi Jambi Tahun 2021" amount of IDR 2,630,162.13 per month.</p>	Complied

		<p>The Company has already set wage standard based on wages set by the government recorded on Memorandum from HRD Manager RO3 no. 001/HR-R03/MEMO/02/2021, dated 1 March 2021; regarding: "Upah Pekerja Tahun 2021", mentions that:</p> <ul style="list-style-type: none"> - Jambi Province Minimum Wage is IDR 2,630,162.13 per month (25 working days) or IDR. 105206.50,- or rounded up to Rp. 105,207,- per day. - The minimum wage is valid from January 1, 2021 - The minimum wage applies to daily workers (PHL) <p>Based on the Memorandum from Management No. 015/HR-AAS/MEMO/04/21 dated April 30, 2021 regarding the 2021 Wage Increase Directive, mentions that:</p> <ol style="list-style-type: none"> a. Increase in Wages for PHL Workers: The increase in PHL wages is determined based on the 2021 UMP/UMK in each Province/Regency (Memorandum from HRD Manager RO3 no. 001/HR-R03/MEMO/02/2021, dated 1 March 2021) b. Increase in Wages for SKUH Group Workers: c. SKUH wages are determined based on the 2021 UMP/UMK in each Province/District. If wages in 2020 are higher than the 2021 UMP/UMK, there will be no change in wages or follow higher wages. d. Increase in Wages for SKUB Workers: <ol style="list-style-type: none"> a) The wage increase is adjusted to the 2021 wage table b) An increase based on an assessment adjusted to the applicable wage table c) The increase based on the assessment does not apply to positions that have reached the highest class <p>This wage increase takes effect from January 1, 2021.</p> <p>The company has determined the Wage Scale Structure for PT RAU Permanent Employees for the 2021 period, as follows:</p>	
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Skala Gaji Pegawai Bulanan 2021 - Jambi

Golongan		1	2	3	4	5	6	7	8
PBI-1	A	3.322.686	3.332.686	3.342.686	3.352.686	3.362.686	3.372.686	3.382.686	3.392.686
PBI-2	B	3.242.686	3.252.686	3.262.686	3.272.686	3.282.686	3.292.686	3.302.686	3.312.686
PBI-3	C	3.162.686	3.172.686	3.182.686	3.192.686	3.202.686	3.212.686	3.222.686	3.232.686
PB-1	D	3.082.686	3.092.686	3.102.686	3.112.686	3.122.686	3.132.686	3.142.686	3.152.686
PB-2	E	3.002.686	3.012.686	3.022.686	3.032.686	3.042.686	3.052.686	3.062.686	3.072.686
PB-3	F	2.922.686	2.932.686	2.942.686	2.952.686	2.962.686	2.972.686	2.982.686	2.992.686
PB-4	G	2.842.686	2.852.686	2.862.686	2.872.686	2.882.686	2.892.686	2.902.686	2.912.686

PBI: Pegawai Bulanan Istimewa

PB: Pegawai Bulanan

Upah UMP	
2021	2.842.686
2020	2.637.000
Kenaikan 2021	205.686 7,80%

Determination of wages including wage documents (payslip) is stated in Indonesian which can be easily understood by workers/employees.

Take a sample of pay slips for verification:

- Employee namely As***** (daily worker/PHL) in Bungo Tebo Estate period September 2021, 10 working days; Basic Salary: IDR 1,052,070 (@ IDR 105,207 per day), premium: IDR 30,000, deduction (incl. Jamsostek and BPJS Kesehatan): IDR 52,604. Net Salary: IDR 1,029,466.
- Employee namely Ri** Wi*** (daily worker/PHL) in Bungo Tebo Estate period September 2021, 20 working days; Basic Salary: IDR 2,104,140 (@ IDR 105,207 per day), premium: IDR 265,414, deduction (incl. Jamsostek and BPJS Kesehatan): IDR 52,604. Net Salary: IDR 2,316,950.
- Employee name He*** Yu***** (permanent worker/SKUB) in Bungo tebo Mill period September 2021, 24 working day; Basic Salary IDR 2,777,000, over time UDR 734,282, process premium IDR 8,731, deduction (incl. Jamsostek and BPJS Kesehatan): IDR 115,607. Net Salary: IDR 3,404,406.

<p>6.2.2</p>	<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>Employment contract are available in Joint working Agreement (PKB 2018-2020 period) and the daily labour contract agreement. The document are detailing payments and condition of employment. Pay and condition are in accordance with UU No, 13 year 2003, UU No. 11 year 2021; UU Cipta Kerja dan Decree of Governor of Jambi related to Minimum Wage 2021 period.</p> <p>Determination of wages (including benefits and other benefit), working hours including overtime and working days have been regulated in the PKB Period 2018-2020 in Article V; Upah - Wages, which explains:</p> <ul style="list-style-type: none"> a) Permanent workers are given wages, the value of which is determined by the employer on the condition that it is not lower than government regulations. b) Certain permanent workers are given wages (Basic Salary and Rice) in accordance with the status of the group/level whose value is determined by the employer with provisions not lower than government regulations c) Permanent workers receive additional wages (UMP / UMSK) and / or attendance incentives as stipulated further in separate provisions. <p>Detailing on holidays and leave (sick leave, maternity leave and menstruation leave), reason for dismissal, period notice have been regulated in Article VIII of PKB.</p> <p>Payroll document are available in Payslip that give to the employees contains information of basic salary, allowances, premium, labor health and accident insurance (BPJS Ketenagakerjaan and Kesehatan) and deduction as well. The wage setting applied by PT RAU is in accordance with Law no. 11 in 2021; UU Cipta Kerja dan Decree of Governor of Jambi related to Minimum Wage 2021 period.</p> <p>Take a sample of pay slips for verification:</p> <ul style="list-style-type: none"> - Employee namely As***** (daily worker/PHL) in Bungo Tebo Estate period September 2021, 10 working days; Basic Salary: IDR 1,052,070 	<p>Complied</p>
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		<p>(@ IDR 105,207 per day), premium: IDR 30,000, deduction (incl. Jamsostek and BPJS Kesehatan): IDR 52,604. Net Salary: IDR 1,029,466.</p> <ul style="list-style-type: none"> - Employee namely Ri** Wi*** (daily worker/PHL) in Bungo Tebo Estate period September 2021, 20 working days; Basic Salary: IDR 2,104,140 (@ IDR 105,207 per day), premium: IDR 265,414, deduction (incl. Jamsostek and BPJS Kesehatan): IDR 52,604. Net Salary: IDR 2,316,950. <p>Scheme smallholders:</p> <p>Work contract agreement between cooperative and staff available in "Perjanjian dan Pengangkatan Karyawan Tetap KOPERASI", s.g:</p> <ul style="list-style-type: none"> - Koperasi Sawit Sumay Makmur – Surat Perjanjian Kerja No 03/SPK/KUD-SSM/IV/2019 tentang Perjanjian dan Pengangkatan Karyawan Tetap KOPERASI Sawit Sumay Makmur, namely Damanhuri (Sekertaris KOPERASI Sawit Sumay Makmur), dated 1 April 2019. - Koperasi Sawit Makmur – Surat Perjanjian Kerja No 03/SK/KUD-SM/I/2019 tentang Perjanjian dan Pengangkatan Karyawan Tetap KOPERASI Sawit Makmur, namely Rahmat (Bendahara KOPERASI Sawit Makmur), dated 1 January 2019. - Koperasi Belarik Jaya – Surat Perjanjian Kerja No 03/SK/KUD-BJ/II/2019 tentang Perjanjian dan Pengangkatan Karyawan Tetap Koperasi Belarik Jaya, namely Khamsiyah (Bendahara Koperasi Belarik Jaya), dated 1 January 2019. - Koperasi Sawit Tambara Jaya – Surat Perjanjian Kerja No 016/SK/KUD-STJ/IV/2018 tentang Perjanjian dan Pengangkatan Karyawan Tetap Koperasi Sawit Tambara Jaya, namely Yadi Efendi (Bendahara Koperasi Sawit Tambara Jaya), dated 1 April 2019. <p>Inside the work contract agreement covers detailing of pay and condition such as: employment status and task, salary, employee obligation, sanction, work termination, dispute settlement, and additional regulation. Contract is made</p>	
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		<p>available in Bahasa Indonesia and understood by both parties. The work contract agreement are in accordance with Law no. 11 in 2021; UU Cipta Kerja dan Decree of Governor of Jambi related to Minimum Wage 2021 period.</p>	
<p>6.2.3</p>	<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>Bungo Tebo POM and Estate: Employment contract are available in Joint working Agreement (PKB 2018-2020 period) and the daily labour contract agreement. The document are detailing payments and condition of employment. Regular working hours has been determined in PKB with maximum 40 hours per week. Deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice also regulated in PKB Article V - VIII. Wages has provides is based on waging regulation (Decree of Governor of Jambi) effective in January 2021. Deduction of wages consist of tax PPH21 and Jaminan Hari Tua (pension plan) and BPJS Kesehatan (health insurance). Evidence of regular working hour, sickness, holiday entitlement, leave, deduction, overtime and wages can be shown in workers payslip and workers attendance "absensi karyawan". During verification of payslip and workers attendance period January - September 2021 can be shown that working hours, deductions, overtime, sickness, holiday entitlement, maternity leave are met with PKB and comply to regulation of employment UU No, 13 year 2003 and UU No. 11 year 2021. During audit there is no workers dismissal or resign. According to PKB workers dismissal can be caused by a violation of the law or a serious violation of the labor rules set out in the Collective Labour Agreement (PKB). Scheme smallholders: Work agreement between cooperative and staff available in "Perjanjian dan Pengangkatan Karyawan Tetap KOPERASI", s.g: - Koperasi Sawit Sumay Makmur – Surat Perjanjian Kerja No 03/SPK/KUD-SSM/IV/2019 tentang Perjanjian dan Pengangkatan Karyawan Tetap KOPERASI Sawit Sumay Makmur, namely Damanhuri (Sekertaris</p>	<p>Complied</p>

		<p>KOPERASI Sawit Sumay Makmur), dated 1 April 2019.</p> <ul style="list-style-type: none"> - Koperasi Sawit Makmur – Surat Perjanjian Kerja No 03/SK/KUD-SM/I/2019 tentang Perjanjian dan Pengangkatan Karyawan Tetap KOPERASI Sawit Makmur, namely Rahmat (Bendahara KOPERASI Sawit Makmur), dated 1 January 2019. - Koperasi Belarik Jaya – Surat Perjanjian Kerja No 03/SK/KUD-BJ/II/2019 tentang Perjanjian dan Pengangkatan Karyawan Tetap Koperasi Belarik Jaya, namely Khamsiyah (Bendahara Koperasi Belarik Jaya), dated 1 January 2019. - Koperasi Sawit Tambara Jaya – Surat Perjanjian Kerja No 016/SK/KUD-STJ/IV/2018 tentang Perjanjian dan Pengangkatan Karyawan Tetap Koperasi Sawit Tambara Jaya, namely Yadi Efendi (Bendahara Koperasi Sawit Tambara Jaya), dated 1 April 2019. <p>Inside the work contract covers employment status and task, salary, employee obligation, sanction, work termination, dispute settlement, and additional regulation. Evidence of pay and condition implementation are available in Payslip and workers attendance. During audit sample seen for payslip and workers attendance period January – September 2021. It can be shown that that working hours, deductions, overtime, sickness, holiday entitlement, maternity leave are met with work contract and comply to regulation of employment UU No, 13 year 2003 and UU No. 11 year 2021.</p>	
6.2.4	<p>(C) The unit of certification provides adequate housing. Sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.</p>	<p>Bungo Tebo POM and Estate: PT Rigunas Agri Utama has provided facility for employee as in "Inventarisasi Bangunan dan Infrastruktur", updated in July 2018, such as:</p> <ul style="list-style-type: none"> - Kantor afdeling (4 units) - Guest house (2 units) - Staff housing (5 units) - Poliklinik (1 unit): 	Complied

		<ul style="list-style-type: none"> - Masjid/Mosque (3 units) - Balai Karyawan (3 units) - Koperasi (1 unit) - D2 type employee housing (38 units); - E4 type employee housing (216 units); - E1 employee housing of 85 units; - Mill worker housing of 84 units; - School buses (4 units) - Sport facilities. <p>Permit for company clinic: "Surat Kantor Penanaman Modal Daerah dan Pelayanan Perizinan Terpadu tentang Surat Izin Penyelenggaraan Klinik Rawat Jalan Pelayanan Medik Dasar No.445/01/SIK/KPMD-PPT/2015 untuk PT. Rigunas Agri Utama, responsible by dr. Arde Hidayat", dated 16 February 2015.</p> <p>The clinic at PT RAU's plantation already has a doctor on behalf of dr. Yudi Chandra who already has "Surat Izin Praktek Dokter No.446/048/DU/DPM-PTSP-K.UKM/2019 on behalf of dr. Yudi Chandra" dated 2 August 2019 and valid until 30 March 2024.</p> <p>Housing for worker was adequate. Housing compound was completed with electricity and clean water (from bore well). During visit, the condition of housing was relatively good, although the awareness to dispose of waste according to procedures should be further increased. PT RAU has checked the clean water laboratory by PT Itec Solution Indonesia on 20 April 2021 based on Permenkes No. 492/MENKES/Per/IV/2010 with the results of clean water quality in accordance with quality standards.</p> <p>Scheme smallholders</p>	
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		Workers that worked in scheme smallholder plantation area was lived in their villages. Clean water need has been fulfilled through water well and buying gallon water.	
6.2.5	The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.	<p>Bungo Tebo POM and Estate:</p> <p>PT RAU has made efforts in terms of providing convenience facilities to get access to food needs and the daily needs of its employees in the form of the establishment of the Jaya Abadi Employee Cooperative which provides basic needs. The company also provides facilities for employees to go to the nearest market by car once a week.</p> <p>Based on interviews with the head of the trade union and the chair of the gender committee that the company has facilitated easy access to food and daily necessities and so far there have been no difficulties.</p> <p>Scheme smallholders:</p> <p>Scheme smallholder lives in the villages surrounding the plantation. The basic need for farmers can be accesses easily, since these worker lives outside the plantation.</p>	Complied
6.2.6	A DLW is paid to all workers in accordance with applicable regulations, including workers who work on a piece rate/quota basis, the calculation of which is based on a quota that can be achieved during regular working hours.	<p>Bungo Tebo POM, Estate and Smallholder:</p> <p>The workers' wages are accordance to Decree of Gubernur of Jambi SK no. 883/KEP.GUB/DISNAKERTRANS-3.3/2020, dated 2 November 2020; regarding: "Penetapan Upah Minimum Provinsi Jambi Tahun 2021" amount of IDR 2,630,162.13 per month.</p> <p>The Company has already set wage standard based on wages set by the government recorded on Memorandum no. 001/HR-R03/ MEMO/01/2020, dated 09 January 2020; regarding: "Upah Pekerja Golongan SKUB" and also the determination of the daily wage for BHL (Daily workers) and PKWT employees (certain time workers). On this memorandum is also determine regarding structure of wage for each level worker (SKU-H and SKU-B). The company issue salary slip to employees together with salary. The salary slip</p>	Complied

		<p>detailed the basic salary, allowances, premium, labor health coverage (BPJS Tenaga kerja and Kesehatan) and deduction.</p> <p>The company has calculated the DLW, based on the wages given to employees as costs given by the company:</p> <p>Following is DLW Calculation:</p> <p>PREVAILING WAGES PT RAU-Bungo Tebo</p> <table border="1" data-bbox="1016 616 1890 1294"> <thead> <tr> <th>In Kind Benefits</th> <th>Total Kebun</th> </tr> </thead> <tbody> <tr> <td>Housing (Cost of Building :30 years)+(Annual Maintenance:Number of houses):12 Months</td> <td>271.152</td> </tr> <tr> <td>Electricity & Water (Annual Cost of Water & Electricity ÷ Number of Houses) ÷ 12 months</td> <td>60.591</td> </tr> <tr> <td>Education [(total costs not including teacher and non teacher labour costs + school transport + school building maintenance + food for children ÷Number of Workers) ÷ 12 months</td> <td>74.903</td> </tr> <tr> <td>Creche Facilities (TPA) (building maintenance + food for children +supplies+ Caretaker costs) ÷ Number of Workers</td> <td>13.447</td> </tr> <tr> <td>Healthcare (Kesehatan) (maintenance of clinic, medicines & medical materials, ambulance transport costs + Cost of Healthcare Workers) ÷ Number of Workers</td> <td>1.423</td> </tr> <tr> <td>Food</td> <td>124.155</td> </tr> <tr> <td>Sport & Recreation Fac.</td> <td>4.723</td> </tr> <tr> <td>Total Cost of In Kind Benefits</td> <td>550.393</td> </tr> <tr> <td>Average Monthly Take Home Salary per Worker</td> <td>2.325.844</td> </tr> <tr> <td>Total Value of Prevailing Wage</td> <td>2.876.238</td> </tr> </tbody> </table>	In Kind Benefits	Total Kebun	Housing (Cost of Building :30 years)+(Annual Maintenance:Number of houses):12 Months	271.152	Electricity & Water (Annual Cost of Water & Electricity ÷ Number of Houses) ÷ 12 months	60.591	Education [(total costs not including teacher and non teacher labour costs + school transport + school building maintenance + food for children ÷Number of Workers) ÷ 12 months	74.903	Creche Facilities (TPA) (building maintenance + food for children +supplies+ Caretaker costs) ÷ Number of Workers	13.447	Healthcare (Kesehatan) (maintenance of clinic, medicines & medical materials, ambulance transport costs + Cost of Healthcare Workers) ÷ Number of Workers	1.423	Food	124.155	Sport & Recreation Fac.	4.723	Total Cost of In Kind Benefits	550.393	Average Monthly Take Home Salary per Worker	2.325.844	Total Value of Prevailing Wage	2.876.238	
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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>There are 2 types of employees at PT RAU, namely Permanent Workers (SKUH and SKUB) and non-permanent workers (PHL: Pekerja harian Lepas - Casual Daily Workers). Based on the list of PT RAU employees as of September 2021, they are as follows:</p> <table border="1" data-bbox="1019 507 1944 774"> <thead> <tr> <th colspan="2">List of Employees Bungo Tebo Estate Period of September 2021</th> <th colspan="2">List of Employees Bungo Tebo Mill Period of September 2021</th> </tr> <tr> <th>Status Karyawan</th> <th>Jml</th> <th>Status Karyawan</th> <th>Jml</th> </tr> </thead> <tbody> <tr> <td>SKUB</td> <td>30</td> <td>SKUB</td> <td></td> </tr> <tr> <td>SKUH</td> <td>115</td> <td>SKUH</td> <td></td> </tr> <tr> <td>PKWT</td> <td>0</td> <td>PKWT</td> <td></td> </tr> <tr> <td>PHL</td> <td>286</td> <td>PHL</td> <td></td> </tr> <tr> <td>Total</td> <td>431</td> <td>Total</td> <td></td> </tr> </tbody> </table> <p>PT RAU has also promoted the appointment of 11 employees who are not eligible to become permanent workers as of October 2021. Based on the Memorandum of RH Plantation 3 No. #0328-0338/HR-RO3/MEMO/SK/10/2021 dated 2021, promotion of the appointment of 11 non-permanent employees to become permanent employees starting November 1, 2021, namely:</p> <ol style="list-style-type: none"> 1. Adi Saputra, Spray Foreman employees Bungo Tebo Estate. 2. Adi Putra Sinaga, Spray team foreman (TUS) Bungo Tebo Estate. 3. Ratna Sari, midwife Bungo Tebo Estate. 4. Hardy A. Ginting, Material warehouse administration (Krani) Bungo Tebo Estate. 5. Zulpikar Setia Noval, security Bungo Tebo Estate. 6. Ophin Silalahi, security Bungo Tebo Estate. 7. Iit Sugianto, Dumb truck driver Truk Bungo Tebo Estate. 8. Rusdi Jamil, operator of LB Bungo Tebo Estate. 9. Jimi Khalter, production administration (Krani Panen) Bungo Tebo Estate. 10. Hairul, FFB loader Bungo Tebo Estate. 	List of Employees Bungo Tebo Estate Period of September 2021		List of Employees Bungo Tebo Mill Period of September 2021		Status Karyawan	Jml	Status Karyawan	Jml	SKUB	30	SKUB		SKUH	115	SKUH		PKWT	0	PKWT		PHL	286	PHL		Total	431	Total		Non-compliance
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		<p>11. Ferdiaman Laia, harvester Bungo Tebo Estate.</p> <p>Until September 2021, total employees of PT RAU were 561 workers, consisting of 256 permanent workers (SKUB and SKUH) and 305 non-permanent workers (PHL).</p> <p>Based on the verification of employee list documents as of September 2021, there are 42 non-permanent workers still working on the main job (harvesting) from 2012 – 2020 at Bungo Estate and 19 non-permanent employees (BHL) at Bungo Tebo Mill.</p> <p>Non conformity found during audit:</p> <p>Based on the verification of the employee’s list document for the September 2021 period, it was found that 42 non-permanent workers are used for main work (Core Work) in harvesting at the Bungo Tebo Estate and 19 non-permanent workers were used in processing work at the Bungo Tebo Mill.</p>	
<p>Criteria 6.3: The unit of certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			
<p>6.3.1</p>	<p>(C) A published statement recognizing freedom of association and right to collective bargaining in national languages is available and is explained to all workers in languages that they understand, and is demonstrably implemented.</p>	<p>Bungo Tebo POM and Estate:</p> <p>Freedom of association policy, dated 1 December 2019, written in Bahasa Indonesia, this policy has been informed to all employees and being placed into public area easily accessed.</p> <p>The number of workers who are members of the PUK SPPP-SPSI Workers Union based on the Minutes of the Establishment of the New Management of the PUK SPPP-SPSI PT Rigunas Agri Utama on 11 October 2019 are 495 people. All members already have a membership card that contains information on their membership number, name, place and date of birth, work unit, organizational position and address.</p> <p>The composition of the PUK SPPP-SPSI PT. Rigunas Agri Utama based on the Minutes of the Establishment of the New Management of PUK SPPP-SPSI PT</p>	<p>Complied</p>

		<p>RAU dated January 28, 2019, that the organizational structure of the workers' union for the 2019-2024 term is as follows:</p> <ul style="list-style-type: none"> - Chairman: TJ. Purba - Secretary: Ahmad Dian - Deputy Secretary: Imam Saputra Kaban - Bendahara: M. Fery Syahputra <p>The management structure of the SPPP-SPSI PUK has been reported to the Tebo Regency Industry, Trade and Manpower Office on 11 October 2019 through a letter from the Head of the Office of Industry, Trade and Manpower No. 560/621Perindagnaker/2019.</p> <p>Scheme smallholders:</p> <p>The smallholder scheme has set a policy for each cooperative. This Cooperative Policy has established policies related to:</p> <ul style="list-style-type: none"> - Fulfilments of legal requirements that apply in the implementation of activities in cooperatives - Ethical conduct in doing business in all business transactions and operations - Respect human rights by treating all KUD employees and farmers fairly - Forbid minors to work in every activity - Prevent sexual harassment and various forms of violence against women - Respect every KUD employee or farmer to form or become a member of a trade union and ensure the confidentiality of the reporter (Whistle-blower) - Respect human rights defenders (HRD) without giving threats and intimidation - Do not provide work under threats, sanctions or penalties where workers do not have the freedom to agree to the implementation of the work. 	
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		<p>The KUD Belarik Jaya Policy, which was published on 4 January 2021 and this policy has been socialized to all its members on 4 January 2021.</p> <p>KUD Sawit Makmur Policy has set on 6 January 2021 and has been socialized to all its farmers' member on 6 January 2021.</p> <p>KUD Sawit Sumay makmur Policy, which published on 5 January 2021 and this policy has been socialized to all its member on 5 January 2021</p> <p>KUD Sawit Tambara Jaya Policy has set on 4 January 2021 and has been socialized to all its farmers' member on 4 January 2021</p> <p>KUD Sumber Usaha Policy has set on 4 January 2021 and has been socialized to all its farmers' member on 4 January 2021.</p>	
6.3.2	<p>Minutes of meetings between the unit of certification with trade unions or worker representatives who are freely elected, are documented in the national languages and available upon request.</p>	<p>Bungo Tebo POM and Estate:</p> <p>Several meetings were held by the Labor Union with the management of PT RAU, in the period of 2021 there were 2 meetings, as follows:</p> <ol style="list-style-type: none"> 1. PUK SPSI meeting with PT RAU management on June 21, 2021, discussion related to the "Manisan" celebration 2. Meeting on August 6, 2021, discussions related to: <ul style="list-style-type: none"> - Problems handling employees exposed to Covid-19 related to daily needs - Self-isolation (Isoman) performed on employees who are exposed to covid-19 - Affirmation of the discipline of health protocols in every activity - Explanation regarding leave during the pandemic Covid-19 <p>Scheme smallholders:</p> <p>No worker union. Most of the workers are field worker, which as temporary worker</p>	Complied

6.3.3	Management does not interfere with the formation or operation of registered labour organizations/unions, or other freely elected representatives for all workers, including migrant and contract workers.	<p>Bungo Tebo POM and Estate:</p> <p>The PUK SPSI PT RAU Workers Union has a management structure and has been submitted to the Dinas Perindustrian, Perdagangan dan Tenaga Kerja Tebo Regency, Prov. Jambi through the Minutes of the Formation of the new PUK SPSI PT RAU Management on January 28, 2019. Dinas Perindustrian, Perdagangan dan Tenaga Tebo Regency has received the submission of the organizational structure through letter No 560/621/Perindagnaker/2019 dated October 1, 2019.</p> <p>In forming the composition of the PUK SPSI management, the management of PT RAU did not interfere and influence the agreed process. Even PT RAU has provided facilities and infrastructure in the form of buildings (rooms and office equipment) that can be used as a place to carry out PUK SPSI activities.</p> <p>Based on an interview with the head of the PT RAU PUK SPSI trade union, it was stated that the management of PT Rau did not interfere in matters regarding the determination of the union board and did not influence workers in terms of participation as members of the PUK SPSI union.</p> <p>Scheme smallholders:</p> <p>No worker union. Most of the workers are field worker, which as temporary worker</p>	Complied
Criteria 6.4: Children are not employed or exploited.			
6.4.1	A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.	<p>Bungo Tebo POM, Estate and Smallholder:</p> <p>PT Rigunas Agri Utama has established Company Policy dated 1 December 2019, that stated no children is allowed to work in any activities/processes in company. This policy was continuously socialized to all worker and contractor on 17-21 February 2020. It stated on Company policy on point 14; "Prohibit children from working in any company activities".</p>	Complied

		<p>In the cooperation contract agreement with the local contractor, it describes compliance with the applicable regulatory and statutory requirements in Article 6, states that; The Second Party (Contractor) is obliged to follow the applicable government regulations in providing vehicles and drivers, including but not limited to manpower and tools to carry out work... ”.</p> <p>Additionally, the Work Agreement Letter, also stated the regulatory and statutory requirements, labor, human rights, which are described in Chapter I. Specifications and Conditions of Work:</p> <p>Point 7: The second party (the Contractor) is obliged to comply with the applicable labor regulations, especially with regard to the payment of wages and the age of workers, namely over 18 (eighteen) years of age. As well as complying with the prohibition on the employment of children, forced labor and workers from human trafficking and must comply with the company's business ethics and comply with all certification requirements and standards.</p> <p>In the cooperation contract document with CPO contractors and CPKO, it is explained in the work contract related to compliance with legal requirements and not employing minors in Article 7: Responsibilities and Obligations, explained about the prohibition of employing children, complying with applicable regulations in Indonesia and applying wages in accordance with the rules and regulations.</p> <p>Certificate holders - PT RAU – Bungo Tebo, has put in place a policy related to the prohibition of child labor (under 18 years), on the document of the FFB Supplier Statement and Guarantee in point 12; "Do not employ children (under 18 years) which as prohibited by Law no. 13/2003.</p> <p>Bungo Tebo Plasma / Smallholder has determined and affirmed that it is related to the prohibition of workers under the age of 18 years in the cooperation contract with transporting FFB in Article 6; Others, point 5: do not employ under age (<18 years).</p> <p>Data seen:</p> <ul style="list-style-type: none"> - Employee register of Bungo Tebo Estate, September 2020 period. There 	
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		<p>were 431 workers, the youngest worker namely Indra Gunawan date of birth 10 November 2000 and joint on 1 Februari 2020 (20 years and 1 months).</p> <ul style="list-style-type: none"> - Employee register of Bungo tebo Mill, September 2021 period. There were 100 workers in operation, the youngest worker namely Awaludin date of birth 27 September 1995 and joint on 1 August 2017 (21 years and 10 months). - On behalf of Nurbaiti, as a contractor to provide transportation for school children with a letter of agreement No. 037/E3KBT/01/20 dated January 2, 2020, valid until December 31, 2020. The last payment transaction was in the August 2020 period. - The cooperation agreement between PT RAU and Mr. A. Rahman on January 2, 2020 No. 041/E3KBT/01/20 for empty fresh bunch (EFB) jobs. The last payment transaction is in the period August 2020. - The work agreement between PT RAU and CV Alam Cahaya Cemerlang on January 2, 2020 No. 087/E3KBT/01/20 for rental of Hitachi ZX 210 type excavator heavy equipment for land clearing preparation work for replanting. The last payment transaction is based on a Time Sheet for the August 2020 period with a rental price of IDR 190,000 per machine hour. - Hazardous and Toxic Substances Waste Management Cooperation Agreement between Asian Agri Group Jambi and PT Shali Riau Lestari and PT Wastec International No. 118/SPK/AAG.JMB-SRL.WI/IV/2015 dated 18 April 2015 with a validity period until this work is not continued. - CPO and CPKO transportation cooperation agreement on behalf of CV Teman Setia contract no. 01/X/TS-RAU/2019 and CV Jaya Pertama contract no. 01/VI/JP-RAU/2020. - Letter of Agreement between Koperasi Unit Desa Sawit Makmur with FFB Transporter on behalf of Mr. Rolip Doc. No. 07/SPK/KUD-SKM/TBS/I/2020 dated 2 January 2020. - Letter of Agreement between Koperasi Unit Desa Sumay Jaya with FFB 	
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		<p>Transporter on behalf of Mr. Iwin Doc. No. 02/SPK/KUD-SJ/TBS/I/2020 dated 2 January 2020.</p>	
<p>6.4.2</p>	<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>Bungo Tebo POM and Estate Based on the employee list of Bungo Tebo Estate and POM, its confirmed that there is no workers under age of 18 years old. The youngest workers as follow:</p> <ul style="list-style-type: none"> - Employee register of Bungo Tebo Estate, September 2020 period. There were 431 workers, the youngest worker namely Indra Gunawan date of birth 10 November 2000 and joint on 1 Februari 2020 (20 years and 1 months). - Employee register of Bungo tebo Mill, September 2021 period. There were 100 workers in operation, the youngest worker namely Awaludin date of birth 27 September 1995 and joint on 1 August 2017 (21 years and 10 months). <p>Company also has procedure for employee recruitment as per SOP AA-HR-305.2 – RO Rekrutmen dan Seleksi Karyawan, dated 1 February 2009. stated in Section 7.0 Tahapan Seleksi – <i>usia minimum kandidat yang diterima adalah 18 tahun</i>, minimum age employee hiring accepted was 18th years old.</p> <p>Scheme smallholders: The smallholder scheme has set a policy for each cooperative. This Cooperative Policy has established policies related to:</p> <ul style="list-style-type: none"> - Fulfilments of legal requirements that apply in the implementation of activities in cooperatives - Ethical conduct in doing business in all business transactions and operations - Respect human rights by treating all KUD employees and farmers fairly - Forbid minors to work in every activity - Prevent sexual harassment and various forms of violence against women 	<p>Complied</p>

		<ul style="list-style-type: none"> - Respect every KUD employee or farmer to form or become a member of a trade union and ensure the confidentiality of the reporter (Whistle-blower) - Respect human rights defenders (HRD) without giving threats and intimidation - Do not provide work under threats, sanctions or penalties where workers do not have the freedom to agree to the implementation of the work. <p>The KUD Belarik Jaya Policy, which was published on 4 January 2021 and this policy has been socialized to all its members on 4 January 2021.</p> <p>KUD Sawit Makmur Policy has set on 6 January 2021 and has been socialized to all its farmers' member on 6 January 2021.</p> <p>KUD Sawit Sumay makmur Policy, which published on 5 January 2021 and this policy has been socialized to all its member on 5 January 2021</p> <p>KUD Sawit Tambara Jaya Policy has set on 4 January 2021 and has been socialized to all its farmers' member on 4 January 2021</p> <p>KUD Sumber Usaha Policy has set on 4 January 2021 and has been socialized to all its farmers' member on 4 January 2021.</p>	
6.4.3	<p>(C) Young person maybe employed only for non-hazardous work with protective restrictions in place for that work.</p>	<p>Bungo Tebo POM, Estate and Smallholder:</p> <p>Based on document verification and interview with workers, there is no young person under 18 years old were employed in PT Rigunas Agri Utama, Bungo Tebo Estate and Mill.</p> <p>Based on the employee list of Bungo Tebo Estate and POM, its confirmed that there is no workers under age of 18 years old. The youngest workers as follow:</p> <ul style="list-style-type: none"> - Employee register of Bungo Tebo Estate, September 2020 period. There were 431 workers, the youngest worker namely Indra Gunawan date of birth 10 November 2000 and joint on 1 Februari 2020 (20 years and 1 months). - Employee register of Bungo tebo Mill, September 2021 period. There were 100 workers in operation, the youngest worker namely Awaludin date of 	Complied

		<p>birth 27 September 1995 and joint on 1 August 2017 (21 years and 10 months).</p>	
<p>6.4.4</p>	<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>Bungo Tebo POM, Estate and Smallholder: PT Rigunas Agri Utama has established Company Policy dated 1 December 2019, that stated no children is allowed to work in any activities/processes in company. This policy was continuously socialized to all worker and contractor on 17-21 February 2020. It stated on Company policy on point 14; "Prohibit children from working in any company activities". In the contract agreement with the local contractor, it describes compliance with the applicable regulatory and statutory requirements in Article 6, states that; The Second Party (Contractor) is obliged to follow the applicable government regulations in providing vehicles and drivers, including but not limited to manpower and tools to carry out work... ". As well as the attachment to the Work Agreement Letter, it is also mentioned in relation to regulatory and statutory requirements, labor, human rights, which are described in Chapter I. Specifications and Conditions of Work: Point 7: The second party (the Contractor) is obliged to comply with the applicable labor regulations, especially with regard to the payment of wages and the age of workers, namely over 18 (eighteen) years of age. As well as complying with the prohibition on the employment of children, forced labor and workers from human trafficking and must comply with the company's business ethics and comply with all certification requirements and standards. In the cooperation contract document with CPO contractors and CPKO, it is explained in the work contract related to compliance with legal requirements and not employing minors in Article 7: Responsibilities and Obligations, explained about the prohibition of employing children, complying with applicable regulations in Indonesia and applying wages in accordance with the rules and regulations. Certificate holders - PT RAU – Bungo Tebo Group, also put in place a policy related to the prohibition of child labor (under 18 years), on the document of</p>	<p>Complied</p>

		<p>the FFB Supplier Statement and Guarantee in point 12; "Do not employ children (under 18 years) which as prohibited by Law no. 13/2003.</p> <p>Bungo Tebo Plasma / Smallholder has determined and affirmed that it is related to the prohibition of workers under the age of 18 years in the cooperation contract with transporting FFB in Article 6; Others, point 5: do not employ under age (<18 years).</p> <p>Data seen:</p> <ul style="list-style-type: none"> - Employee register of Bungo Tebo Estate, September 2020 period. There were 431 workers, the youngest worker namely Indra Gunawan date of birth 10 November 2000 and joint on 1 Februari 2020 (20 years and 1 months). - Employee register of Bungo tebo Mill, September 2021 period. There were 100 workers in operation, the youngest worker namely Awaludin date of birth 27 September 1995 and joint on 1 August 2017 (21 years and 10 months). - On behalf of Nurbaiti, as a contractor to provide transportation for school children with a letter of agreement No. 037/E3KBT/01/20 dated January 2, 2020, valid until December 31, 2020. The last payment transaction was in the August 2020 period. - The cooperation agreement between PT RAU and Mr. A. Rahman on January 2, 2020 No. 041/E3KBT/01/20 for empty fresh bunch (EFB) jobs. The last payment transaction is in the period August 2020. - The work agreement between PT RAU and CV Alam Cahaya Cemerlang on January 2, 2020 No. 087/E3KBT/01/20 for rental of Hitachi ZX 210 type excavator heavy equipment for land clearing preparation work for replanting. The last payment transaction is based on a Time Sheet for the August 2020 period with a rental price of IDR 190,000 per machine hour. - Hazardous and Toxic Substances Waste Management Cooperation Agreement between Asian Agri Group Jambi and PT Shali Riau Lestari and PT Wastec International No. 118/SPK/AAG.JMB-SRL.WI/IV/2015 dated 18 	
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<p>Criteria 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.</p>			
6.5.1	<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>Bungo Tebo POM and Estate:</p> <p>A policy to prevent sexual and all other form of harassment and violence are available, "Kebijakan Perusahaan" signed by Managing Director on 1st December 2019. In the policy point 15 stated that "Mencegah pelecehan seksual dan berbagai bentuk kekerasan terhadap perempuan serta melindungi hak-hak reproduksinya". The policy has been communicated to all level workforce, the last socialization was conducted on 2 September 2021 attended by 57 participants and also conducted on 21 September 2021 attended by 32 participants.</p> <p>The company has also issued a Memorandum through Group Manager No. 002/EM-RAU/KBT/MEMO/2/2021 dated February 1, 2021, explains that: Based on Law no. 13 of 2003 article 83: "Female workers/laborers whose children are still breastfeeding must be given a proper opportunity to breastfeed their children if it must be done during working hours", for this reason the company management provides rest periods to breastfeed their children with the following conditions:</p> <ul style="list-style-type: none"> - Break time for breastfeeding every weekday from 10.00 to 10.30 	Complied

		<ul style="list-style-type: none"> - Signing the permission to go home breastfeeding that has been provided every day - Wages in kind are adjusted to the applicable company regulations. <p>This memorandum was conveyed to all female workers at PT RAU both at Bungo Tebo Estate and Mill on 3 February 2021 which was attended by 18 female workers who still have babies and also attended by chairman of Gender Committee Ms. Nurbaiti.</p> <p>Scheme smallholders:</p> <p>The smallholder scheme has set a policy for each cooperative. This Cooperative Policy has established policies related to:</p> <ul style="list-style-type: none"> - Fulfilments of legal requirements that apply in the implementation of activities in cooperatives - Ethical conduct in doing business in all business transactions and operations - Respect human rights by treating all KUD employees and farmers fairly - Forbid minors to work in every activity - Prevent sexual harassment and various forms of violence against women - Respect every KUD employee or farmer to form or become a member of a trade union and ensure the confidentiality of the reporter (Whistle-blower) - Respect human rights defenders (HRD) without giving threats and intimidation - Do not provide work under threats, sanctions or penalties where workers do not have the freedom to agree to the implementation of the work. <p>The KUD Belarik Jaya Policy, which was published on 4 January 2021 and this policy has been socialized to all its members on 4 January 2021.</p>	
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		<p>KUD Sawit Makmur Policy has set on 6 January 2021 and has been socialized to all its farmers' member on 6 January 2021.</p> <p>KUD Sawit Sumay makmur Policy, which published on 5 January 2021 and this policy has been socialized to all its member on 5 January 2021</p> <p>KUD Sawit Tambara Jaya Policy has set on 4 January 2021 and has been socialized to all its farmers' member on 4 January 2021</p> <p>KUD Sumber Usaha Policy has set on 4 January 2021 and has been socialized to all its farmers' member on 4 January 2021.</p>	
6.5.2	<p>(C) A policy to protect the reproductive rights of all, especially of women, is documented, implemented and communicated to all levels of the workforce.</p>	<p>Bungo Tebo POM and Estate:</p> <p>A policy to prevent sexual and all other form of harassment and violence are available in "Kebijakan Perusahaan" signed by Managing Director on 1st December 2019. In the policy point 15 stated that "Mencegah pelecehan seksual dan berbagai bentuk kekerasan terhadap perempuan serta melindungi hak-hak reproduksinya". The policy has been communicated to all level workforce, the last socialization was conducted on 2 September 2021 attended by 57 participants and also conducted on 21 September 2021 attended by 32 participants.</p> <p>The company has also issued a Memorandum through Group Manager No. 002/EM-RAU/KBT/MEMO/2/2021 dated February 1, 2021, explains that: Based on Law no. 13 of 2003 article 83: "Female workers/laborers whose children are still breastfeeding must be given a proper opportunity to breastfeed their children if it must be done during working hours", for this reason the company management provides rest periods to breastfeed their children with the following conditions:</p> <ul style="list-style-type: none"> - Break time for breastfeeding every weekday from 10.00 to 10.30 - Signing the permission to go home breastfeeding that has been provided every day - Wages in kind are adjusted to the applicable company regulations. 	Complied

		<p>This memorandum was conveyed to all female workers at PT RAU both at Bungo Tebo Estate and Mill on 3 February 2021 which was attended by 18 female workers who still have babies and also attended by chairman of Gender Committee Ms. Nurbaiti.</p> <p>Document verified:</p> <ol style="list-style-type: none"> 1. Application for permission to breastfeed a child on April 15, 2021 on behalf of Nurhayati, the employee of Bungo Tebo Mill. 2. Application for permission to breastfeed a child on April 23, 2021 on behalf of Rosyanti Situmeang, the employee of Bungo Tebo Estate. <p>The company has provided menstrual leave for female employee in accordance with the recommendation from paramedic in clinic, and this is in line with "Perjanjian Kerja Bersama" and applicable regulations.</p> <p>The company has granted the right for maternity leave the women who gave birth in accordance with the applicable rules and "Perjanjian Kerja Bersama".</p> <p>The company has consistently performed pregnancy tests to women workers who worked as a fertilizer and spraying every 1 month. The last pregnancy test was conducted on 8 September 2021, checks were carried out on 72 female workers.</p> <p>The company has a policy of not hiring female labor during pregnancy or breast-feeding for the kind of work that endanger such as fertilizer or spraying by temporarily moving the work force to other types of work.</p> <p>Scheme smallholders:</p> <p>The smallholder scheme has set a policy for each cooperative. This Cooperative Policy has established policies related to:</p> <ul style="list-style-type: none"> - Fulfilments of legal requirements that apply in the implementation of activities in cooperatives - Ethical conduct in doing business in all business transactions and 	
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		<p>operations</p> <ul style="list-style-type: none"> - Respect human rights by treating all KUD employees and farmers fairly - Forbid minors to work in every activity - Prevent sexual harassment and various forms of violence against women - Respect every KUD employee or farmer to form or become a member of a trade union and ensure the confidentiality of the reporter (Whistle-blower) - Respect human rights defenders (HRD) without giving threats and intimidation - Do not provide work under threats, sanctions or penalties where workers do not have the freedom to agree to the implementation of the work. <p>The KUD Belarik Jaya Policy, which was published on 4 January 2021 and this policy has been socialized to all its members on 4 January 2021.</p> <p>KUD Sawit Makmur Policy has set on 6 January 2021 and has been socialized to all its farmers' member on 6 January 2021.</p> <p>KUD Sawit Sumay makmur Policy, which published on 5 January 2021 and this policy has been socialized to all its member on 5 January 2021</p> <p>KUD Sawit Tambara Jaya Policy has set on 4 January 2021 and has been socialized to all its farmers' member on 4 January 2021</p> <p>KUD Sumber Usaha Policy has set on 4 January 2021 and has been socialized to all its farmers' member on 4 January 2021.</p>	
6.5.3	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified in accordance with applicable regulations in Indonesia.</p>	<p>Bungo Tebo POM, Estate and Smallholder:</p> <p>The company has conducted a survey with 18 young/new mothers. The survey was conducted in the period of 12 January 2021 with the results of the survey identified that there are several things that young/new mothers need, as follows:</p> <ol style="list-style-type: none"> 1. Room for breastfeeding mothers in accordance with Minister of Health Regulation No. 15 of 2013. Company stipulation: carry out routine 	Complied

		<p>maintenance of available nursing mothers' rooms (at polyclinics and daycare centers)</p> <ol style="list-style-type: none"> 2. Time/permission for breastfeeding mothers. Company compliance: permission is given to female employees who are still breastfeeding their children from 10.00-10.30 in accordance with Memorandum No. o. 002/EM-RAU/KBT/MEMO/2/2021 dated February 1, 2021. 3. The need for nutritious food for mothers and children. Company compliance: providing employee cooperatives that provide special food needs for mothers and babies. 4. Health needs for mothers and children. Company compliance: implement and facilitate Posyandu once a month and provide immunization facilities for children under five in the garden polyclinic. The last Posyandu and Immunization activities for children were held on October 20, 2021. 	
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>Bungo Tebo POM and Estate:</p> <p>The company has established mechanism for handling grievance from external party as in "Mekanisme Penanganan Keluhan Stakeholder" dated 22 Apr 2019. Smallholders are include as external in the mechanism. And there is also procedure no. SOP AA-GL-510.1.R0 dated January 1, 2013 regarding the Handling of Public Complaints, explains that this procedure is the handling of complaints from the concerned parties.</p> <p>The company has also provide channel to report to report if there is violation to the principles and objectives, through email whistleblow@rgei.com or phone (62) 81 2755 2528.</p> <p>Scheme smallholders</p> <p>Cooperative has prepared mekanisme on communication with interested parties under "Mekanisme Komunikasi, Konsultasi dan Keluhan" produced January 2019. This document being part of List of Publicly Available Document</p>	Complied

		<p>in Koperasi Sawit Suway makmur, Koperasi Belarik Jaya, Koperasi Sawit Tambara Jaya, Koperasi Sumay Jaya and also Koperasi Sumber Usaha.</p> <p>Cooperative has also prepared a procedure to uphold policy on secrecy of whistle blower under "Mekanisme Jaminan Pelapor dan Pengungkapan Kasus" dated 12 June 2015.</p>	
<p>Criteria 6.6: No forms of forced or trafficked labour are used.</p>			
<p>6.6.1</p>	<p>(C) All work is voluntary and the following are prohibited:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports; • Payment of recruitment fees; • Contract substitution without worker’s consent • Involuntary overtime; • Lack of freedom of workers to resign • Penalty for termination of employment, unless the unit of certification and the workers agree to the penalty and it is stated in the employment agreement • Debt bondage • Withholding of wages 	<p>Bungo Tebo POM and Estate:</p> <p>Based on document verification, there was no indication of forced labour and/or human trafficking. All employees have had work agreement, regulating the rights and obligation of company and employee. The work agreement including working hour and salary payment.</p> <p>Based on document verification (list of employees, salary slips and payroll for the period of September 2021) and interviews with PT RAU management, no work termination was identified that was not in accordance with the work contract, the determination of overtime time was in accordance with the Overtime Work Order (SPL), and was not identified there are employees who work because of debt with the company. Based on the verification of salary slips and payrolls for the period of August 2020, it was not identified that there were salary cuts that were not in accordance with the regulations, even though there were subsidies and deductions for BPJS contributions that were in accordance with applicable regulations. There was no identification of a work bond that impeded employee resignation, there was no indication of a cost involved in the employee recruitment process.</p> <p>Based on interview with management and verification to the master list of employees 2021 period, that there is no use of migrant/foreign/ honorary worker. All employee including temporary workers have work agreement; regulating the scope of work, work agreement timeframe, working hour, salary payment, overtime and Jamsostek.</p>	<p>Complied</p>

		<p>From several employees at Bungo Estate and Mill who were interviewed during the audit, that in the employee recruitment process there were no retention of identity documents or passports, payment of recruitment fees, contract substitution without worker’s consent, involuntary overtime, lack of freedom of workers to resign, penalty for termination of employment, unless the unit of certification and the workers agree to the penalty and it is stated in the employment agreement, debt bondage and withholding of wages.</p> <p>Scheme Smallholders: Similar to estate and mill, there is no forced and trafficked labour has noted during assessment. KUD has a policy related to use of migrant worker inside “Kebijakan Koperasi”. Based on document verification and interview with worker, there were no migrant worker used in cooperative. All worker in cooperative have work agreement. All of them already appointed as permanent worker.</p>	
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>Bungo Tebo POM, Estate and Smallholder: There are 2 types of employees at PT RAU, namely Permanent Workers (SKUH and SKUB) as much as 226 workers and non-permanent workers (PHL: Pekerja Harian Lepas - Casual Daily Workers) as much as 305 workers. Based on the list of PT RAU employees as of September 2021, they are as follows: PT Rigunas Agri Utama has established mechanism/procedure related to recruitment; SOP no. AA-HR-305-2-00 dated 1 February 2009 – Recruitment and Selection and the management of PT RAU (Group Manager). Further, PT RAU – Tebo has been issued a Memorandum on September 1, 2020 No. 034/ RAU/MEMO/IX/20 regarding Guidelines for the acceptance and appointment of employees of PT RAU Bungo Tebo Group, including explaining the determination of the maximum term of PKWT for 2 (two) years by considering evaluation of eligibility.</p>	Complied

		This memorandum is effective from September 1, 2020 and this memorandum is also based on reference to Law no. 11 of 2021 concerning Cipta Kerja.	
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	(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>Bungo Tebo POM and Estate</p> <p>PT Rigunas Agri Utama – Bungo Tebo POM and Estate has appointed the responsible person for H&S is identified as per P2K3 (Safety Committee Meeting). P2K3 has an approval from Manpower and Transmigration Office.</p> <p><u>Bungo Tebo POM:</u></p> <p>P2K3 approval based on “Keputusan Kepala UPTD Balai Pengawasan Ketenagakerjaan Wilayah II Dinas Tenaga Kerja dan Transmigrasi Provinsi Jambi Nomor: 560/436/UPTD II/Nakertrans 3.1/III/2019 Tentang Pengesahan Panitia Pembina Keselamatan dan Kesehatan Kerja (P2K3) Pada Perusahaan PT Rigunas Agri Utama PMKS” issued September 2019. P2K3 headed by Mill Manager and secretary of P2K3 was KTU (Sopian Batara Siburian); secretary of P2K3 was OHS expert as well. Certificate OHS expert on behalf Sopian No: 5/6965/AS.02.04X/2020 dated 21 October 2020; Decree Letter OHS Expert from Ministry of Manpower “Keputusan Menteri Ketenagakerjaan RI Nomor: 5/9810/AS.02.04/X/2020 Tentang Penunjukan Ahli Keselamatan dan Kesehatan Kerja Umum Menteri Ketenagakerjaan RI” dated 21 October 2020 valid until 3 years. Licence No. Reg. 88650/PK3/AJ/12/2020/P0 dated 21 October 2020 valid until 21 October 2023.</p> <p>Safety committee meeting structure has been revised on October 2020 and approved by local authority based on “Keputusan Kepala UPTD Balai Pengawasan Ketenagakerjaan Wilayah II Dinas Tenaga Kerja dan Transmigrasi Provinsi Jambi Nomor: 87/KEP/UPTDWIL2.3/P2K3/X/2020 Tentang Pengesahan Revisi Keanggotaan Panitia Pembina Keselamatan dan Kesehatan Kerja (P2K3) Pada Perusahaan PT Rigunas Agri Utama” issued 22 October 2020.</p>	Complied

		<p>Currently the organisation of P2K3 has been revised since the mill manager as a chairman of P2K3 is replaced by new mill manager on October 2021.</p> <p><u>Bungo Tebo Estate:</u></p> <p>P2K3 approval based on "Keputusan Kepala UPTD Balai Pengawasan Ketenagakerjaan Wilayah II Dinas Tenaga Kerja dan Transmigrasi Provinsi Jambi Nomor: 560/434/UPTD II/Nakertrans 3.1/III/2019 Tentang Pengesahan Panitia Pembina Keselamatan dan Kesehatan Kerja (P2K3) Pada Perusahaan PT Rigunas Agri Utama Kebun" issued September 2019. P2K3 headed by Estate Manager and secretary of P2K3 was Sustainability Staff (Rico Santoso); he was OHS expert as well. Decree Letter OHS Expert from Ministry of Manpower "Keputusan Menteri Ketenagakerjaan RI Nomor: KEP.2694/NAKER-BINWASK3/IV/2017 Tentang Penunjukan Ahli Keselamatan dan Kesehatan Kerja Umum Menteri Ketenagakerjaan RI" dated 18 April 2017 valid until 3 years. Licence No. Reg. 38974/PK3/AJ/14/2017/P0 dated 18 April 2017 valid until 18 April 2020. OHS licence on behalf Rico Santoso was in process of renewal according to Letter of Statement from Disnakertrans Provinsi Jambi No. 168/Disnakertrans-3.1/2020 dated 1 October 2020.</p> <p>The safety committee (P2K3) has regular meeting every month to discuss OHS plan program achievement and corrective actions to achieve target and improve the program such as: Personal Protective Equipment (PPE), accident report, nearmiss report, review status of OHS program, P2K3 performance evaluation, etc. Notes of Safety Committee Regular Meeting (mill and estate) with workers were evident. Sample reports reviewed were for meeting during January – December 2020 and January – September 2021. The actions were monitored for realisation and reported to management and local authority.</p> <p>Sample record of safety committee meeting:</p> <p><u>Bungo Tebo POM:</u></p> <ul style="list-style-type: none"> - Minutes of Meeting, dated 27th April 2021, agenda: review status previous OHS program, review illness report from clinic, evaluation of P2K3 performance 2021, review progress objective and program OHS, review 	
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		<p>nearmiss log up to March 2021.</p> <ul style="list-style-type: none"> - Minutes of Meeting, dated 3rd May 2021, agenda: review status previous OHS program, review illness report from clinic, evaluation of P2K3 performance 2021, review progress objective and program OHS, review nearmiss log up to April 2021. - Minutes of Meeting, dated 28th June 2021, agenda: review status previous OHS program, review of illness report from clinic, evaluation of P2K3 performance 2021, review progress objective and program OHS, review nearmiss log up to May 2021. <p><u>Bungo Tebo Estate:</u></p> <ul style="list-style-type: none"> - Minutes of Meeting, dated 12 July 2021, agenda: coordination for OSH training, review risk analysis and accident report, review illness report. - Minutes of Meeting, dated 9 August 2021, agenda: coordination for OSH training, review risk analysis and accident report, review illness report. - Minutes of Meeting, dated 13 September 2021, agenda: review previous P2K3 meeting, review PPE monitoring, review risk analysis and its control, review OHS performance by calculating LTA metric, review of illness report from clinic. <p>Reports of P2K3 activity are submitted to Disnakertrans Prov. Jambi UPTD Wil II Muara Bungo each quarter, report quarter 1 (January - March) submitted on 13 April 2021, quarter 2 (April – June) submitted on 7 July 2021 and quarter 3 (July - September) submitted on 12 October 2021. Evidence of report submission are available in Daftar Distribusi Eksternal. Report P2K3 are covering information of manpower number, P2K3 programme and implementation, P2K3 structure, accident report, OHS Objective and target progress, minutes of meeting P2K3.</p> <p><u>Scheme Smallholder:</u></p> <p>Smallholder’s cooperative has assigned responsible person to monitor OSH, including monitoring for First Aid inspection in three monthly basis. In example:</p>	
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		<ul style="list-style-type: none"> - KUD Sumber Usaha, PIC OSH on behalf Suhermanto based on "Surat Keputusan Pengurus Koperasi Sumber Usaha Desa Tuo Sumay Kec. Sumay, Kab. Tebo Nomor: 09/KUD-SU/I/2020 dated 12 January 2020. - Koperasi Sawit Tambara Jaya, PIC OSH on behalf Suhermanto based on "Surat Keputusan Pengurus Koperasi Sawit Tambara Jaya Desa Tuo Sumay Kec. Sumay, Kab. Tebo Nomor: 08/KUD-ST/I/2020 dated 5 January 2020. - Koperasi Sawit Makmur, PIC OSH on behalf Dede Apriansyah based on "Surat Keputusan Pengurus Koperasi Sawit Makmur Desa Tuo Sumay Kec. Sumay, Kab. Tebo Nomor: 13/KUD-SM/I/2020 dated 7 January 2020. - Koperasi Sumay Jaya, PIC OSH on behalf Aprizal based on "Surat Keputusan Pengurus Koperasi Sumay Jaya Desa Tuo Sumay Kec. Sumay, Kab. Tebo Nomor: 12/KUD-SJ/I/2020 dated 12 January 2020. - Koperasi Belarik Jaya, PIC OSH on behalf Fauzan based on "Surat Keputusan Petugas K3 KUD Belarik Jaya Desa Tuo Sumay, Kec. Sumay, Kab. Tebo Nomor: 21/KUD-BJ/III/2021 dated 7 February 2021. - KUD Tanjung Dani Sakti, PIC OSH on behalf Mukhlisin based on "Surat Keputusan Petugas K3 KUD Tanjung Dani Sakti Desa Tuo Sumay, Kec. Sumay, Kab. Tebo Nomor: 32/KUD-TDS/III/2021 dated 1 March 2021. - KUD Tanjung Aur Duri, PIC OSH on behalf Faisal based on "Surat Keputusan Petugas K3 KUD Tanjung Aur Duri Desa Tuo Sumay, Kec. Sumay, Kab. Tebo Nomor: 16/KUD-TAD/TAD/IV/2021 dated 4 February 2021. - KUD Sawit Sumay Makmur, PIC OSH on behalf Sarman based on "Surat Keputusan Petugas K3 KUD Sawit SUMay Makmur Desa Pinang Balai, Kec. Serai Serumpun, Kab. Tebo Nomor: 05/KUD-SSM/SSM/III/2021 dated 5 January 2021. <p>First Aid training for smallholders cooperative and responsible person at each cooperative conducted on 11 June 2019 (attended by 15 representatives) and 23 July 2019 (12 representatives). Refreshment for P3K socialization to</p>	
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		mandore/foreman has been conducted on 13 April 2021 (attend by 18 foreman).	
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>Bungo Tebo POM and Estate: PT Rigunas Agri Utama has prepared the procedure for emergency and work accidents under "Prosedur Kesiagaan dan Tanggap Darurat No.AA-EMS-820-PR" dated 5 April 2017, for spillage and fire; "Prosedur Pengendalian Gempa Bumi, Banjir dan Tanah Longsor No.AA-KL-18-EFP" dated 1st December 2010, for earthquake, flood and landslide. PT Rigunas Agri Utama has established the emergency response and preparedness team as per "Struktur Organisasi Tanggap Darurat", updated on 26 August 2020 for Bungo Tebo POM and Estate. Team leader is Mr Ronal Marpaung (Estate Manager) and Mr Leo Butar Butar (Mill Manager). Company has Assigned operatives trained in first aider on behalf Yongki Arif Pratipta and Ratna Sari. Both first aider has been trained by Dinas Tenaga Kerja dan Transmigrasi Provinsi Jambi on 14 – 15 October 2021. Certificate and licence of First aider has been obtained:</p> <ul style="list-style-type: none"> - Certificate number No. Ser: UPTD/Nakertrans/3.1.2/X/2021, dated 16 October 2021, on behalf Yongki Arif Pratipta issued by Dinas Tenaga Kerja dan Transmigrasi Provinsi Jambi. Licence Reg. No. Ser/UPTDI/Nakertrans/3.1.2/2021 dated 16 October 2021 valid until 16 October 2024. - Certificate number No. Ser: UPTD/Nakertrans/3.1.2/X/2021, dated 16 October 2021, on behalf Ratna Sari issued by Dinas Tenaga Kerja dan Transmigrasi Provinsi Jambi. Licence Reg. No. Ser/UPTDI/Nakertrans/3.1.2/2021 dated 16 October 2021 valid until 16 October 2024. <p>Report on monitoring of first aid kit and first aid box on monthly basis can be demonstrated during audit (period January – September 2021).</p>	Complied

		<p>Scheme Smallholder:</p> <p>Emergency and work accident procedure available under: "Prosedur Kesiagaan dan Tanggap Darurat No.AA-EMS-820-PR" dated 5 April 2017, for spillage and fire; "Prosedur Pengendalian Gempa Bumi, Banjir dan Tanah Longsor No.AA-KL- 18-EFP" dated 1 December 2010, for earthquake, flood and landslide. This emergency procedure also applicable for smallholder's scheme.</p> <ul style="list-style-type: none"> - KUD Sumber Usaha, PIC OSH on behalf Suhermanto based on "Surat Keputusan Pengurus Koperasi Sumber Usaha Desa Tuo Sumay Kec. Sumay, Kab. Tebo Nomor: 09/KUD-SU/I/2020 dated 12 January 2020. - Koperasi Sawit Tambara Jaya, PIC OSH on behalf Suhermanto based on "Surat Keputusan Pengurus Koperasi Sawit Tambara Jaya Desa Tuo Sumay Kec. Sumay, Kab. Tebo Nomor: 08/KUD-ST/I/2020 dated 5 January 2020. - Koperasi Sawit Makmur, PIC OSH on behalf Dede Apriansyah based on "Surat Keputusan Pengurus Koperasi Sawit Makmur Desa Tuo Sumay Kec. Sumay, Kab. Tebo Nomor: 13/KUD-SM/I/2020 dated 7 January 2020. - Koperasi Sumay Jaya, PIC OSH on behalf Aprizal based on "Surat Keputusan Pengurus Koperasi Sumay Jaya Desa Tuo Sumay Kec. Sumay, Kab. Tebo Nomor: 12/KUD-SJ/I/2020 dated 12 January 2020. <p>First Aid training for smallholders cooperative and responsible person at each cooperative conducted on 11 June 2019 (attended by 15 representatives) and 23 July 2019 (12 representatives). Refreshment for P3K socialization to mandore/foreman has been conducted on 13 April 2021 (attend by 18 foreman).</p>	
6.7.3	<p>(C) Workers use appropriate personal protective equipment (PPE) which is provided free of charge to all workers in the workplace, to cover all potentially hazardous operations, such as pesticides application, machine operations, land preparation, and harvesting. Sanitation facilities for those</p>	<p>Bungo Tebo POM and Estate:</p> <p>PT Rigunas Agri Utama has prepared the procedure of PPE - "SOP Alat Pelindung Diri' No: AA-SOP-OP- 101.3. The procedure stated that the company provided adequate and appropriate protective equipment for all workers at place of works, in line with the risk assessment. PT Rigunas Agri Utama has provided adequate Personal Protective Equipment (PPE) in accordance with its</p>	<p>Non-compliance</p>

	<p>applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p>	<p>designation for each worker. Personal protective equipment provided in accordance with the risk analysis document. For example:</p> <ul style="list-style-type: none"> - PPE intended for palm oil mill operators includes: Helmets, safety shoes, gloves, earplugs. - PPE for welders: Welding goggles, welding gloves, safety shoes and helmet - PPE for harvesters: Helmet, gloves, boots, safety goggles - PPE for spray and fertilizer employees: Apron, Rubber gloves, boots, safety goggles, masks. <p>Evidence of providing PPE to employees can be shown in the "Bukti Serah Terima Alat Pelindung Diri". Sample seen:</p> <ul style="list-style-type: none"> - "Bukti Serah Terima Alat Pelindung Diri" on October 18, 2021 to harvester consist of glasses, hand gloves, boots, safety helmets, safety goggles; - "Bukti Serah Terima Alat Pelindung Diri" on October 18, 2021 to sprayer workers consist of hats, goggles, masks, aprons and rubber gloves; - "Bukti Serah Terima Alat Pelindung Diri" on October 18, 2021 to fertilizer workers consist of Apron, glasses, masks, rubber gloves and boots. <p>The company also provides facilities for washing and storing PPE and personal clothing for sprayer and fertilizer workers. Bathrooms are also provided for sprayer and fertilizer workers so that after spraying and fertilizing employees can do body cleaning before going home.</p> <p>All workers of PT Rigunas Agri Utama Bungo Tebo POM and Estate has been also provided covered with medical care and accident insurance (BPJS Ketenagakerjaan & BPJS Kesehatan). The insurances were still valid as seen by the recent slip payment in January – December 2020 and January – September 2021 for estate and mill.</p> <p>Non conformity found during audit:</p> <p>During field visit to Bungo Tebo Palm oil Mill, it was found that driver from plasma (scheme smallholder) and outgrower including kernel transport were</p>	
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		<p>not using shoes but instead using slipper when driving FFB transport and perform weighing in Bungo Tebo POM.</p> <p>Correction and corrective action has been done, please see 3.3 Detail of Nonconformities.</p> <p>Scheme Smallholder:</p> <p>Workers at smallholder’s blocks for harvesting and fertilizer application mostly handle by block owner itself. Harvester and fertilizer workers are use appropriate PPE during working. It was confirmed during field visit to smallholder plots and interview with smallholder member sampled. Harvester are using safety helmet, goggles, hand gloves and safety boots; fertilizer workers are using apron, mask, goggles, safety boots and hand gloves.</p> <p>For pesticide/herbicide application conducted by workers of the company PT Rigunas Agri Utama. Accident insurance for spraying workers already registered by BPJS Ketenaga Kerjaan, managed by the company.</p>	
6.7.4	<p>All workers are provided medical care and covered by accident insurance. Costs incurred from work related incidents, leading to injury or illness, are covered in accordance with applicable regulations or by the unit of certification if applicable regulations do not provide protection.</p>	<p>PT Rigunas Agri Utama – Bungo Tebo has been provided insurance to all workers including non-permanent worker. Insurance covered by BPJS, as mandated by government regulation. Medical checkup provided for all workers (not only for high-risk worker).</p> <p>PT Rigunas Agri Utama – Bungo Tebo has also been provided clinic for all workers. Referral are made to nearest hospital should the case is severe/critical. Medical check-up has been conducted for all workers all in Bungo Tebo The medical check-up including blood test, physical examination, audiometric test and spirometric test. Result of examination for worker is kept. Company also providing social and accident insurance in from BPJS Ketenagakerjaan – for all workers.</p> <p>Document verification:</p> <ul style="list-style-type: none"> • Transfer form to BPJS Ketenagakerjaan, month September 2021 	Complied

		<ul style="list-style-type: none"> • Rekapitulasi Rincian Pembayaran Iuran both BPJS Kesehatan dan Ketenagakerjaan month September 2021 • Transfer record/form via Mandiri Bank for period September 2021, validation number ***, dated September 2021, <p>Scheme Smallholder: No workers being employ permanently by the smallholders. Provision of insurance in case of accident, through donation from smallholders and "Kelompok Tani".</p>	
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	<p>Bungo Tebo POM and Estate: PT Rigunas Agri Utama has demonstrated the record of OHS injuries by using the LTA metrics. The monitoring carried out on monthly basis and results were discussed during safety committee meeting. The incident statistics include man-hours, lost time accident and Frequency rate (FR) and Severity rate (SR) were reported quarterly as P2K3 report by safety officer to Manpower office, sample seen: P2K3 report period July – September 2021 submitted on 12 October 2021 Refreshment training related accident investigation procedure to all supervisor (assistant and foreman) has been carried out by company. Data verification during recertification assessment:</p> <ul style="list-style-type: none"> - Bungo Tebo Estate: during 2020 there were 24 accident occur with category medical aid, there is no lost time causing by this injury, frequency rate 13.26 and saverity rate 0. During 2021 (ytd Sept 2021) there were 6 accident with category first aid, there is no lost time causing by this injury, frequency rate 0 and saverity rate 0. - Bungo Tebo POM: during 2020 there were 24 accident occur with category medical aid, there is no lost time causing by this injury, frequency rate 	Complied

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		<p>13.26 and severity rate 0. During 2021 (ytd Sept 2021) there was no accident, there were 29 nearmiss, no lost time causing bay nearmiss.</p> <p>The document of Accidents Investigation shown sufficient and there was conducted for all category of accidents, e.g: Report of Accident Investigation dated 22 June 2020; name Dedi; Hand injured when patching tires; The corrective has followed up and implementation. The recommendation for corrective action is available.</p> <p>Refreshment training related to investigation procedure was conducted on 13 August 2019 attended by 8 supervisor.</p>	
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Principle 7: Protect the environment, conserve biodiversity and ensure sustainable management of natural resources.

Criteria 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.

7.1.1	(C) IPM plans are implemented and monitored to ensure effective pest control.	<p>According to the Agricultural Policy Manual SOP AA-APM-OP-1100.10. R6 "Pengendalian Hama dan Penyakit" (Pests & Disease Control), certificate holder has plan to implement integrated pest management.</p> <p>Company has an effort to improve the natural predator of caterpillar pest by planting host plant along the main road and production road. Example of verified data until October 2021:</p> <table border="1"> <thead> <tr> <th rowspan="2">Host Plant</th> <th colspan="2">Qty</th> </tr> <tr> <th>Plan</th> <th>Actual</th> </tr> </thead> <tbody> <tr> <td><i>Casia Sp.</i></td> <td>27,460</td> <td>24,198</td> </tr> <tr> <td><i>Turnera subulate</i></td> <td>6,625</td> <td>6,407</td> </tr> <tr> <td><i>Antigonon leptosus</i></td> <td>6,324</td> <td>6,556</td> </tr> </tbody> </table> <p>According to the interview with pest control officer in Bungo Tebo Estate obtain information that management has had a schedule to regularly monitored pest attack (census) as follows:</p>	Host Plant	Qty		Plan	Actual	<i>Casia Sp.</i>	27,460	24,198	<i>Turnera subulate</i>	6,625	6,407	<i>Antigonon leptosus</i>	6,324	6,556	Complied
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		<ul style="list-style-type: none"> - Census of caterpillar/bag worm by monthly basis. - Census of Ganoderma annually. - Census rat infestation by recap the record of sortation in loading ramp. - Census of Barn Owl Box occupation in three monthly basis. <p>The last census in Bungo Tebo Estate has been conducted in September 2021. Result of census shows that pest attack still under control (below the economic threshold) which is 0,3 – 1,3% (limit 5%).</p> <p>During the field visit, auditor also observe barn owl box in the ground. Estate manager informed that barn owl box has been installed with hectare covered 1:25 Ha (each owl box covered 25 Ha). The last monitoring on September 2021 show that 31 owl boxes in Afd. 03 Bungo Tebo Estate are fully occupied. For example, barn owl box number 11 occupy by a pair of owls.</p> <p>Scheme Smallholder:</p> <p>Based on field visit and interview with smallholder representatives from KUD Sumay Jaya, KUD Sumber Usaha, KUD Sawit Tambara Jaya, KUD Tanjung Aur Duri, KUD Sawit Makmur, KUD Sawit Sumay Makmur, KUD Belarik Jaya and KUD Tanjung Dani Sakti obtain information that they have been planted beneficial plant such as <i>Turnera subulata</i> and <i>Antigonon leptosus</i> as an early warning system in case of worm attack.</p> <p>They also installed barn own box (4 unit in each plot) to control rat population. All of this early warning system supported by the company.</p> <p>According to document verification, pest monitoring and control sighted pest management plan to conduct caterpillar/bag worm census in by monthly and barn owl box monitored in three monthly bases. Census was conducted by field supervisor that help by person that assign by board of KUD.</p>	
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		During the field visit to the smallholder plot sighted no outbreak. All plot is in good condition and well maintained.	
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.	<p>The company has issued memorandum No.025/R&D/MEMO/V/20, dated 11 May 2020, issued by R&D. The memorandum mentioned that based on a review of the operations carried out in plantation cultivation, there is no use of invasive species in the cultivation of oil palm plantations in Bungo Tebo Estate, this is based on several sources review including:</p> <ul style="list-style-type: none"> a. PermenLHK No.P.94/MENLHK/SEKJEN/KUM.1/12/2016, regarding invasive species. b. CABI.org c. Global Invasive Species Database. <p>Based on document review, PT Rigunas Agri Utama has been identified the list of invasive species as per PermenLHK P.94/2016.</p>	Complied
7.1.3	There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities.	Based on document review, interview and field observation obtained information that there is no record use of fire for pest control.	Complied
<p>Criteria 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.</p>			

<p>7.2.1</p>	<p>(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p>	<p>Based on the document verification and interview with management, obtain information that there is only pesticide usage for chemical weeding and pest control (if needed). Recommendation of pesticide used are refer to SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i> (weed control) where explain the weeds type, weeding control methods and eradication, pesticide characteristic, and procedures of application (spraying volume, calibration, chemical weeding interval, target and sprayer maintenance).</p> <p>During the audit, found some pesticide list that usually used with active ingredients such as isopropyl amine glyphosate, trichlopyr, methyl metsulfuron, Glifosat, lamda sihalotrin and dimetil amina. Certificate holder no longer using paraquat since 15 November 2019, according to the circular letter of Deputy Managing Director No. 008/DMD/MEMO/OCT/19 dated 22 October 2019.</p> <p>To reduce the human and environmental risk, there is some continuous action that has been implemented as follows:</p> <ul style="list-style-type: none"> • Set up the pesticide rotation. For example, chemical weeding rotation is 4 times a year where the rotation in immature and early mature more often than mature and old palm. • Using the ultralow volume nozzle to minimize water consumption and reduce the risk for environment. During the field visit to the pesticide store sighted the micron herby system knapsack as example. • Conducted regularly training for pesticide applicator and equipped them with appropriate PPE's. • Delaying the pesticide if weed or pest is under control. According to the interview with estate manager obtain information that the pesticide rotation can be delayed or reduced especially in mature or old palm where weeds/pest population are under control. • Minimalize contamination for pesticide applicator and their families by ensuring them to clean themselves before back home. 	<p>Complied</p>
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		<p>PT. Rigunas Agri Utama - Bungo Tebo refers to "Daftar Pestisida yang Digunakan PT RAU", period 2020 and 2021:</p> <p>2021</p> <table border="1"> <thead> <tr> <th>Brand</th> <th>Active Ingredient</th> <th>LD50</th> <th>WHO Class</th> <th>Target</th> </tr> </thead> <tbody> <tr> <td>Elang 480SL</td> <td>Isopropil Amina Glifosat 480 g/l</td> <td>5,000</td> <td>III</td> <td>Weeds with broad leaves</td> </tr> <tr> <td>Sweeper 480SL</td> <td>Glifosat 356 g/l</td> <td>4,230</td> <td>III</td> <td>Weeds with broad leaves</td> </tr> <tr> <td>Kenlone 480 EC</td> <td>Trychlopyr: 480 gr/ltr</td> <td>4,500</td> <td>III</td> <td>Weeds with broad leaves</td> </tr> <tr> <td>Metaprima 20WGD</td> <td>Metil metsulfuron</td> <td>5.000</td> <td>III</td> <td>Weeds with broad leaves</td> </tr> <tr> <td>Kenrane 288EC</td> <td>trifluroksipir-1 Metil heptil ester: 288 gr/ltr</td> <td>5,000</td> <td>III</td> <td>Weeds with broad leaves</td> </tr> <tr> <td>Bastamet 150SL</td> <td>Glufosinate Ammonium</td> <td>1,910</td> <td>II</td> <td>Weeds with broad and narrow leaves</td> </tr> <tr> <td>Bionasa 480 SL</td> <td>Glyphosate</td> <td>5,000</td> <td>III</td> <td>Weeds with broad and narrow leaves</td> </tr> </tbody> </table>	Brand	Active Ingredient	LD50	WHO Class	Target	Elang 480SL	Isopropil Amina Glifosat 480 g/l	5,000	III	Weeds with broad leaves	Sweeper 480SL	Glifosat 356 g/l	4,230	III	Weeds with broad leaves	Kenlone 480 EC	Trychlopyr: 480 gr/ltr	4,500	III	Weeds with broad leaves	Metaprima 20WGD	Metil metsulfuron	5.000	III	Weeds with broad leaves	Kenrane 288EC	trifluroksipir-1 Metil heptil ester: 288 gr/ltr	5,000	III	Weeds with broad leaves	Bastamet 150SL	Glufosinate Ammonium	1,910	II	Weeds with broad and narrow leaves	Bionasa 480 SL	Glyphosate	5,000	III	Weeds with broad and narrow leaves	
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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>PT. RAU – Bungo Tebo prepared the calculation for pesticide use with active ingredient use, active ingredient and LD50 applied per Ha – monitored per year.</p> <p>2021 (January – September)</p> <table border="1" data-bbox="1019 472 1933 1193"> <thead> <tr> <th>Active Ingredient</th> <th>Brand</th> <th>LD50 (mg/kg)</th> <th>Total active ingredient</th> <th>TOTAL Chemical used</th> <th>Toxicity Planted (active ingredient/ha)</th> </tr> </thead> <tbody> <tr> <td>Isopropil Amina Glifosat 480 g/l</td> <td>Elang 480SL</td> <td>5,000</td> <td>3,073.00</td> <td>1,012.40</td> <td>0.69</td> </tr> <tr> <td>Trychlopyr: 480 gr/ltr</td> <td>Kenlone 480 EC</td> <td>4,500</td> <td>4.70</td> <td>94.00</td> <td>0.03</td> </tr> <tr> <td>Glifosat 356 g/l</td> <td>Sweeper 480SL</td> <td>4,230</td> <td>1.33</td> <td>3,752.73</td> <td>0.01</td> </tr> <tr> <td>Metil metsulfuron</td> <td>Metaprima 20WGD</td> <td>5.000</td> <td>100.2</td> <td>563,471.00</td> <td>0.03</td> </tr> <tr> <td>trifluroksipir-1 Metil heptil ester: 288 gr/ltr</td> <td>Kenrane 288EC</td> <td>5,000</td> <td>1.44</td> <td>5.00</td> <td>0.00</td> </tr> <tr> <td>Glufosinat</td> <td>Basta 150SL</td> <td>1,910</td> <td>303.92</td> <td>1,055.28</td> <td>0.58</td> </tr> <tr> <td>Glifosat</td> <td>Bionasa 480 SL</td> <td>5,000</td> <td>3.74</td> <td>13.00</td> <td>0.01</td> </tr> </tbody> </table> <p>For Y 2020 (January – December)</p> <table border="1" data-bbox="1019 1278 1933 1378"> <thead> <tr> <th>Active Ingredient</th> <th>Brand</th> <th>LD50 (mg/kg)</th> <th>Total active ingredient</th> <th>TOTAL Chemical used</th> <th>Toxicity Planted (active</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Active Ingredient	Brand	LD50 (mg/kg)	Total active ingredient	TOTAL Chemical used	Toxicity Planted (active ingredient/ha)	Isopropil Amina Glifosat 480 g/l	Elang 480SL	5,000	3,073.00	1,012.40	0.69	Trychlopyr: 480 gr/ltr	Kenlone 480 EC	4,500	4.70	94.00	0.03	Glifosat 356 g/l	Sweeper 480SL	4,230	1.33	3,752.73	0.01	Metil metsulfuron	Metaprima 20WGD	5.000	100.2	563,471.00	0.03	trifluroksipir-1 Metil heptil ester: 288 gr/ltr	Kenrane 288EC	5,000	1.44	5.00	0.00	Glufosinat	Basta 150SL	1,910	303.92	1,055.28	0.58	Glifosat	Bionasa 480 SL	5,000	3.74	13.00	0.01	Active Ingredient	Brand	LD50 (mg/kg)	Total active ingredient	TOTAL Chemical used	Toxicity Planted (active							Complied
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		Isopropil Amina Glifosat 480 g/l	Elang 480SL	5,000	3,073	5,487	0.69
		Trychlopyr: 480 gr/ltr	Kenlone 480 EC	4,500	6.78	136	0.04
		Metil metsulfuron	Metaprima 20WGD	5,000	11.20	531	0.00
		trifluroksipir-1 Metil heptil ester: 288 gr/ltr	Kenrane 288EC	5,000	10.11	35	0.02
		Glufosinat	Basta 150SL	1,910	67.54	235	0.13
		Glifosat	Bionasa 480 SL	5,000	347.53	1,207	0.66
		Diuron 80%	Amchothe ne 75SP	945	2.30	8	0.00
7.2.3	(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.	Until this surveillance audit obtain information that there is no pesticide use for control pest attack. All of pesticide only using for weeding (herbicide). Based on interview with IPM supervisor and smallholder representatives known that no outbreak that causes pesticide usage.					Complied
7.2.4	There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in Indonesia best practice guidelines.	Based on document verification, interview and field observation obtained information that there is no prophylactic use of pesticides.					Complied
7.2.5	Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat, are not to be used,	Asian Agri Top management has issued the letter (email) on 20 August 2019 to all Plantation Regional Head which stated that paraquat usage maximum					Non-compliance

	<p>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>until the end of September 2019 and the stock of paraquat by end of September 2019 must be zero (0).</p> <p>There is no use of Paraquat in 2020 and 2021. Bungo Tebo Estate and Smallholders has no longer use paraquat since October 2019.</p> <p>Non conformity found during audit:</p> <p>During field visit it was found the paraquat usage by smallholder member without due diligence process, or when authorised by government authorities for pest outbreaks.</p> <ul style="list-style-type: none"> - Based on field visit to smallholder KUD Sawit Sumay Makmur, in area block No.426 Sumanto-Ginting/Bunyamin and No.420 Ruslan-Margito, audit team found freshly used Noxone (a.i. Paraquat) and Metsulindo (a.i. Methyl Metsulfuron). - Based on field visit to KUD Sumay Makmur, KT 34 kavling No. 719 Ngadri confirmed that weeds control in his plots was handle by himself using Gramoxone. - Based on field visit to KUD Sawit Tambara Jaya KT 46, Kav. 2272 Sahori, confirmed that weeds control in his plots was handle by himself and found the ex Noxone (paraquat) usage in the field. 	
	<p>7.2.5b Why there is no other alternative which can be used.</p>	<p>According to IPM procedures, certificate holder always using biological approach in order to monitoring pest attack. For example, estate using <i>Tyto alba</i> to monitor rat infestation than using rodenticide.</p> <p>To maintain ground condition especially weeding control, certificate holder has had a procedures SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i> (Weed Control). This procedure has set the specific pesticide in with minimum risk in accordance with the target.</p>	
	<p>7.2.5c Which process was applied to verify why there is no other less hazardous alternative.</p>	<p>Certificate holder through Asian Agri's Research and Development Department has examined some pesticide in specific target. The result of examination and</p>	

		pesticide recommendation written in the SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i> (Weed Control).	
	7.2.5d Process to limit the negative impacts of the application.	<p>SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i> (Weed Control) has set some procedures to reduce negative impact of the application as follows:</p> <ul style="list-style-type: none"> • Pesticide/herbicide selection to ensuring the application is effective. • Set up the appropriate nozzle in chemical weeding activity based on weed type, topography and availability of water. • Regularly spraying calibration to ensuring the application is effective and efficient. • Calculate pesticide/herbicide usage based on target (hectarage and weed type). • Spraying technic. 	
	7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.	<p>Certificate holder did not use pesticide to eradicate pest without the outbreak. If any census result shows the pest attack almost reach the economical threshold, they usually conducted campaign test using pesticide if needed.</p> <p>Chemical weeding activity has regularly set by management. For example, normally circle, path and collecting point weeding conducted 4 times a year in immature and mature area. Those application can be reduced in line with the palm ages.</p>	
7.2.6	(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>Bungo Tebo Estate:</p> <p>Company provides pesticide training for sprayers. Training on pesticide use "Pelatihan Pestisida Terbatas" conducted on 11 September 2019, attended by 81 participants from PT RAU and PT IIS, 12 sprayer workers from Bungo Tebo Estate. Training conducted incorporated with Syngenta and "Komisi Pengawas Pestisida dan Pupuk" Provinsi Jambi. Another training of pesticide use carried out on 26 August 2015 by "Komisi Pengawas Pupuk dan Pestisida Pemerintah</p>	Complied

		<p>Provinsi Jambi". However, currently company has no longer use paraquat for weeds control so that it is not necessary to conduct the pesticide use training. Refreshment training for spraying workers are regularly conducted by Bungo Tebo Estate to updates the knowledge about the activity of pesticide/herbicide application. Latest training conducted on 16 June 2020 and 04 March 2021 attended by 29 participants.</p> <p>Application of pesticides was following SOP of Pesticides Management – "Pestisida dan Pengelolaannya" (AA-APM-OP-1100.11-R1) Chapter III point 3.2 which stated that pesticide operator must be fit, not in pregnancy or breast feeding, must have meal before work, and uses appropriate PPE.</p> <p>Spraying team using sign board indicating spraying/herbicide application is in progress for a block. Spraying supervisor was pre- mixing the herbicide in the chemical warehouse, transport the mixed chemical via truck, using cone and spill tray on the field to minimize spillage. The type and dosage of herbicide are carefully measured and prepared for targeted weed control; circle and path spray or selective weeding (wooden, bracken, or VOP). Nozzle calibration conducted regularly and recorded – evident.</p> <p>Sprayers and spraying supervisor are trained with best management practice for weed control, spraying techniques, using PPE and received regular medical check-up. Clean water and soap on the field are provided for sprayer. Supervisor was equipped with first aid kit.</p> <p>Appropriate PPE has been provided by company and used by spraying workers such as: Apron, leather and rubber hand gloves, respiratory masker, safety goggles, head cover and rubber boot.</p> <p>Scheme Smallholder:</p> <p>At Kebun Plasma Bungo Tebo, the weed control/spraying program was carried by trained sprayers from PT. Rigunas Agri Utama. Company conducted pesticide training "Pelatihan Pestisida Terbatas" by PT. Syngenta Indonesia for the worker: Yuliansyah, Ahmad Ansri, Bagas Ade Bramantya, Adi Putra Sinaga,</p>	
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		<p>Ridwansyah Putra, Adi Saputra, Hendri, Nia Herani Zega, Nurhuda, Pinarla Laia and Rini Widia on 11 Sept 2019. Attendance list available.</p> <p>Confirmed during interview with Plasma Management and smallholders that spraying activity conducted only by special team 'TUS' from the company workers.</p>	
7.2.7	<p>(C) Storage of all pesticides in accordance with recognized best practices.</p>	<p>SOP for pesticide storage has been provided in SOP "<i>Pengangkutan dan Penyimpanan Bahan Kimia AA-KL-02-EFP</i>" dated 1 February 2008. Pesticides are stored in the determined area separated from fertilizer and other chemicals. Pesticides storage is provided in Divisions as well as in central storage. Agrochemicals storage is locked areas with limited access. The storage is ventilated. MSDS and hazard symbol label are provided nearby of pesticides. Emergency shower and eyewash are also provided to anticipate in case of an emergency of agrochemical handling. PPE for handling of pesticides are provided including boots, apron, safety glass, respiratory mask and hand gloves. The possible spill is managed. Secondary containment is provided around the pesticide's storage area. Spill kit is also provided in the area.</p> <p>Storage of pesticides found to be in accordance with hazard identification and risk assessment and national guideline for limited pesticide use. Empty chemical containers had been used for mixing chemicals for spraying pesticides in the field.</p> <p>The management of waste material from empty pesticide container disposed through hazardous waste store as per procedure "<i>Penanganan Limbah Industri B-3 AA-KL-06-EFP</i>" dated 1 November 2008. The company has temporary hazardous waste storage where all hazardous waste from all estates and mills collected. The storage has obtained the license as per "<i>Keputusan Kepala Badan Penanaman Modal dan Pelayanan Perizinan Terpadu Satu Pintu Kabupaten Tebo Nomor: 01/2019 Tentang Izin pengelolaan Limbah Bahan Berbahaya dan Beracun (B3) Untuk Kegiatan Penyimpanan Sementara Limbah B3 kepada PT Rigunas Agri Utama Di Desa Tuo Sumay Kecamatan Sumay Kab. Tebo, Jambi</i>" dated 28 April 2019 valid until 28 April 2024 (5 years). Storage</p>	Complied

		keeper maintains the balance of incoming and outgoing hazardous waste. Hazardous wastes were sent to licensed contractor PT Shali Riau Lestari and PT. Hazmat Techno Indonesia for appropriate disposal.	
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>According to the procedure Hazardous Waste Handling AA-KL-06-EFP Rev. 8 dated 01/06/2021, ex pesticides container are treat as hazardous waste. The ex pesticide container store in the Licenced Temporary hazardous waste storage with maximum store within 180 day and deliver to the Licenced transporter and vendor of hazardous waste PT Shali Riau Lestari and PT Hazmat Techno Indonesia.</p> <p>Record of hazardous waste handling (ex chemical/pesticide container) were presented in "Berita Acara Serah Terima Limbah B3", "Neraca Limbah B3" and "Manifest Limbah B3". During audit both document were available and properly maintained. Sample seen:</p> <ul style="list-style-type: none"> - Manifest No. KLHK-1621417428 dated 24/03/2021, for ex chemical/pesticide container with amount 0.261 ton. Delivery from PT Rigunas Agri Utama by PT Shali Riau Lestari. - Berita Acara Serah Terima Limbah B3 dated 28/10/2021, ex chemical/pesticide container with amount 284 kg deliver from PT Rigunas Agri Utama by PT Hazmat Techno Indonesia. 	Complied
7.2.9	(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.	There is no aerial application of pesticide by PT Rigunas Agri Utama, both at the company owned plantation and the scheme smallholder plantation.	Not Applicable
7.2.10	(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.	Specific medical surveillance conducted twice a year by company. Latest MCU in Bungo Tebo Estate conducted on 11 June 2021 by company doctor and paramedic for 148 workers (spraying workers, manuring workers, warehouse, pest and disease workers).	Complied

		MCU covering: urine test, respiratory rate, heart rate, blood test (haemoglobin, leuokosi). According to test result confirmed that all the workers are normal, some of workers indicated high haemoglobin and leukosit. The recommendation for follow up has been raised and implemented. Next MCU for pesticide operator will be conducted on December 2021.	
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.	Company has implemented the protection of women reproductive rights, in form of maternal leave, period leave, and regular pregnancy check for female sprayers and strictly prohibit pregnant and/or breastfeeding female worker applying pesticides. Interview with female spraying workers in Block C17 Afdeling III Bungo Tebo Estate, confirmed that there is no pregnant workers are handling pesticide/herbicide. Pregnancy test for female spraying workers conducted each month, latest test conducted on 8 September 2021 by testpack urine. According to the test result there was 128 workers female (manuring workers, pest and disease workers and spraying workers) with test result negative Company has a policy to prohibit peganant or breastfeeding women to conduct the working related to agrochemical (pesticide and fertilizer). <u>Scheme Smallholder:</u> Most farmer members of Muara Bulian Smallholder were not directly conducted pesticide application and handling. Spraying works (pesticide application) in smallholder area were performed mostly by spraying team called TUS from PT Rigunas Agri Utama.	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.	The waste management plan "Evaluasi Aspek Dampak Lingkungan" nomor: EMS-431-003-LT last review on 9 January 2020 is available. The identification of waste and pollution sources including used lubricant and filter, old battery, used laboratory chemical, clinical/medical waste, mill effluent, EFB, smoke,	Complied

		<p>dust, fiber and shell, empty agrochemical container, boiler ash, scrap iron, used tires, waste water and domestic household refuse.</p> <p>PT Rigunas Agri Utama has established the procedure to manage the waste generated from all activity, i.e:</p> <ol style="list-style-type: none"> 1. Procedure AA-KL-05-EFP, procedure of non-hazardous waste handling covering: mill waste (used rail, used part, ex-chemical non-hazardous/toxic, EFB, fiber, shell), estate waste (used polybag, ex fertilizer sack), office waste (used paper, used work equipment), Workshop waste (used hose, hose, used parts, scarped), logistic waste (ex-fertilizer sack, used drum). 2. AA-KL-06-EFP rev. 07 dated 22 April 2016, procedure of hazardous waste handling including source of hazardous waste, handling process, packing process, hazardous waste storage, emergency situation handling on hazardous waste. 3. Procedure AA-KL-11-EFP, procedure of laboratory waste handling. 4. Procedure to utilize the fiber and shell (solid waste) as a boiler fuel SOP No. AA-MPMOP-1400.04-R1 "Pemanfaatan fiber untuk bahan bakar". 5. EFB (Empty Fruit Bunch) utilization as a mulching or organic fertilizer according to SOP Pemupukan AA-APM-OP-1100.09-R1. 6. SOP AA-PL-04-EFP Rev. 2 dated 15 Jan 2010, procedure for utilize the waste water from waste water installation in to the plantation as land application. <p>Hazardous and medical waste is disposed to the register collectors while domestic waste disposed to the landfill, organic and an organic waste is separate in line site, organic waste to the landfill and some of inorganic waste is collected for re-cycle.</p>	
7.3.2	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.	During interview with warehouse workers, laboratory workers and estate workers, it confirmed that they understood the waste management procedure and hazardous waste handling.	Non-compliance

		<p>PT Inti Indosawit Subur has a waste management plan, identifying type and source of waste and the disposal plan. PT Inti Indosawit Subur prepared a procedure to handle hazardous waste titled "Prosedur Penanganan Limbah B3" No.AA-KL-06-EFP explains methods to collecting the waste, recording in balance and disposal through licensed third party transporter.</p> <p>The company store hazardous waste in temporary storage with permit, The hazardous waste is sent to the registered collector/transporter which approved by Environmental Ministry, namely PT Shalli Riau Lestari.</p> <p>Based on interview with workers who are handling of pesticides that they understood of disposed empty containers pesticides, such as: Empty chemical containers re-used only for mixing purposes, unusable are triple rinsed, punctured and disposed to the approval collector.</p>	
7.3.3	The unit of certification does not use open fire for waste disposal.	<p>According to waste management and handling procedure as described in indicator 7.3.1 confirmed that waste disposal shall be handled as per procedure and no open fire of waste disposal.</p> <p>PT Rigunas Agri Utama – Bungo Tebo POM and estate has a policy for zero burning in plantation development as stated in Company Policy updated 1 December 2019 point 6 "<i>melakukan praktek tanpa bakar dalam kegiatan Pembangunan perkebunan dan secara aktif mendukung inisiatif mencegah dan mengawasi kebakaran hutan dan asap</i>" - practice zero-burning in plantation development activities and actively support initiatives to prevent and control forest fires and haze.</p> <p>All waste products has been identified and documented under the "Evaluasi Aspek- Dampak Lingkungan" (Environmental Aspect impacts). Domestic waste is the main concern to be manage. Both Mill and Estate, has periodically schedule to manage the domestic waste. Regulation of domestic waste management refer to "UU No. 18 Tahun 2008 tentang Pengelolaan Sampah". PT Rigunas Agri Utama has provide landfill for domestic waste. During field visit to landfill area at Bungo Tebo Estate shown that landfill area has well managed and domestic waste handling in accordance with procedure and</p>	Complied

		regulation. During audit onsite confirmed that there is no open fire for waste disposal.	
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.	The procedure to to manage soil fertility is available (see detail in indicator 3.3.1). The implementation of manuring is based on fertilizer recommendation that set by Asian Agri’s Research and Development Department. Fertilizer dosage has set according to the soil needed refer to Soil and Leaf analysis. Fertilizer applicator has been trained to not applied fertilizer in riparian or water source to minimize environmental impact. Other sample is land application, the land application officer ensures and control the effluent only applied in flatbed. The application out of flatbed area are strictly prohibited.	Complied
7.4.2	Analysis of tissue samples (e.g. leaves) and soil on a regular basis to monitor and manage changes in soil fertility and plant health is documented.	<p>According to the Asian Agri’s agricultural policy, soil sampling conducted every 5 years of palm age, while leaf sampling conducted annually. Based on document verification sighted the report of soil and leaf sampling in own estate and smallholders as follows:</p> <p>The last soil sampling conducted on June 2016. Parameter that tested are N, C, K, Ca, Mg and pH.</p> <p>The last leaf sampling conducted on May 2021. Parameter that tested is major element (Ash, N, P, K Mg, Ca) dan Minor element (B, Cu, Zn, Mn, Fe). Leaf analysis conducted to 66 leaf samples. Result of analysis documented in Foliar Analysis Report Ref. No. 87/LSU-AGR/04/2020 (Afd. I, II and III) dated 2 May 2020 and 139/LSU-Agr/05/2020 (Afd IV) dated 19 May 2020. Example of analysis result:</p> <ul style="list-style-type: none"> - No. Lab. 20L07738; Block B17a; YOP 2017; 6.29% Ash; 2.78% N; 0.160% P; 1.01% K; 0.36% Mg; 0.58% Ca and 32 ppm B. - No. Lab. 20L07739; Block B17g; YOP 2017; 6.27% Ash; 3.11% N; 0.168% P; 1.00% K; 0.43% Mg; 0.70% Ca and 23 ppm B. - No. Lab. 20L12942; Block D08a; YOP 2008; 4.44% Ash; 0.075% P; 	Complied

		<p>1.54% K.</p> <ul style="list-style-type: none"> - No. Lab. 20L12943; Block D08b; YOP 2008; 4.38% Ash; 0.093% P; 1.53% K. - No. Lab. 20L12950; Block D08o; YOP 2008; 4.53% Ash; 0.095% P; 1.56% K. - No. Lab. 20L12856; Block A16a; YOP 2016; 6.77% Ash; 2.59% N; 0.159% P; 1.07% K; 0.38% Mg; 0.60% Ca and 44 ppm B. - No. Lab. 20L12873; Block A16a; YOP 2016; 6.08% Ash; 0.130% P; 2.25% K. <p>Those analysis report generated the fertilizer recommendation 2021 by Asian Agri's Research and Development Department, PT Nusa Pusaka Kencana – Tebing Tinggi.</p>	
7.4.3	A nutrient recycling strategy is in place, which include the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.	<p>Based on the Agricultural Policy Manual, certificate holder has a guidance in organic fertilizers such as Empty Fruit Bunch (EFB) and Palm Oil Mill Effluent (POME). Certificate holder has implemented EFB application in estate with dosage 30 – 50 ton/Ha in normal soil and POME with dosage 750 m³/Ha.</p> <p>There is no longer EFB application in Bungo Tebo Smallholders at this time, since their area include in replanting plan in 2020 and 2021.</p>	Complied
7.4.4	Records of fertilizer inputs are maintained.	<p>Bungo Tebo POM and Estate:</p> <p>The company has established procedure on soil fertility, "SOP AA-APM-OP-1100.09. R1" - SOP Pemupukan, consist of type and recommendation of fertilizer for immature and mature areas, cycle, dosage and when fertilizer is applied.</p> <p>To maintain soil fertility, Bungo Tebo Estate applied placing palm frond above ground level (L shape) and empty bunch application as well as Palm Oil Mill Effluent (POME) application (land application). During field visit can be demonstrated that company has applied management strategy to maintain soil fertility according to the procedure.</p>	Complied

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		<p>Bungo tebo Estate applied inorganic fertilizer. Record of fertilizer application in Bungo Tebo Estate 2021 as a recommendation are available in "Fertilizer application and recommendation 2021 Bungo Tebo Estate". Record of fertilizer for 2020 and 2021 as follows:</p> <p>2020</p> <table border="1"> <thead> <tr> <th>Fertilizer Type</th> <th>Recommendation (Kg)</th> <th>Realization until September (Kg)</th> <th>%</th> </tr> </thead> <tbody> <tr> <td colspan="4" style="text-align: center;">Mature</td> </tr> <tr> <td>AC</td> <td>706,611</td> <td>722,651</td> <td>102</td> </tr> <tr> <td>MOP</td> <td>584,135</td> <td>584,145</td> <td>100</td> </tr> <tr> <td>RP</td> <td>426,029</td> <td>427,828</td> <td>100</td> </tr> <tr> <td>Kieserite</td> <td>41,303</td> <td>40,537</td> <td>100</td> </tr> <tr> <td>Dolomite</td> <td>424,566</td> <td>424,567</td> <td>100</td> </tr> <tr> <td>HGFB</td> <td>31,228</td> <td>31,220</td> <td>100</td> </tr> <tr> <td>Hi Kay</td> <td>136,825</td> <td>19,842</td> <td>131</td> </tr> <tr> <td colspan="4" style="text-align: center;">Immature</td> </tr> <tr> <td>TSP</td> <td>36,995</td> <td>46,858</td> <td>127</td> </tr> <tr> <td>RP</td> <td>52,409</td> <td>52,417</td> <td>100</td> </tr> <tr> <td>Kieserite</td> <td>67,159</td> <td>52,521</td> <td>78</td> </tr> <tr> <td>HGFB</td> <td>13,503</td> <td>10,837</td> <td>80</td> </tr> <tr> <td>Hi Kay</td> <td>289,454</td> <td>291,466</td> <td>101</td> </tr> </tbody> </table>	Fertilizer Type	Recommendation (Kg)	Realization until September (Kg)	%	Mature				AC	706,611	722,651	102	MOP	584,135	584,145	100	RP	426,029	427,828	100	Kieserite	41,303	40,537	100	Dolomite	424,566	424,567	100	HGFB	31,228	31,220	100	Hi Kay	136,825	19,842	131	Immature				TSP	36,995	46,858	127	RP	52,409	52,417	100	Kieserite	67,159	52,521	78	HGFB	13,503	10,837	80	Hi Kay	289,454	291,466	101	
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		2021					
		Fertilizer Type	Recommendation (Kg)	Realization until September (Kg)	%		
		Mature					
		AC	954,770	748,397	78		
		MOP	803,938	679,479	85		
		RP	623,216	623,219	100		
		Kieserite	56,252	38,984	69		
		HGFB	38,805	29,053	75		
		Hi Key	181,927	146,849	81		
		Immature					
		TSP	65,832	66,300	24		
		RP	93,262	22,668	100		
		Kieserite	50,041	43,889	76		
		HGFB	17,786	15,607	87		
		Hi Key	656,916	501,405	87		
		Scheme Smallholder:					
		Plasma Bungo Tebo has established procedure soil fertility in AA-PLASMA-PP-KS-03 – Panduan Pelaksanaan Pemupukan. The procedure covered type of fertilizer and its content, fertilizer quality analysis, fertilizer recommendation					

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and fertilizer application which must be appropriate in dosage, time, place and technique.

Application technique on Section 2.4 mention that main principle of fertilizer application is every palm must receive all fertilizer type based on recommendation. Fertilizer application conducted based on basic principles: accurate dosage, time, place and technique.

To maintain soil fertility, plasma management also applied palm frond stacking in 'U' shape around palm oil trees. Plasma Bungo Tebo also applied inorganic fertilizer to maintain soil fertility. Record of fertilizer for 2020 – 2021 as follows:

2020

Fertilizer recommendation (Kg)	KUD Sawit Tambara Jaya	KUD Sumay Jaya	KUD Sawit Makmur	KUD Sumber Usaha	KUD Tanjung Aur Duri	KUD Tanjung Dani Sakti	KUD Belarik Jaya
AC							
Dosage	1.5 Kg (1x application)						
Recommendation	41,036	88,088	258,048	70,656	26,112	54,480	69,888
Realization	41,036	89,088	238,048	70,656	26,112	54,480	69,888
RP							
Dosage	1.0 Kg (1x application)						
Recommendation	27,904	-	86,016	23,552	8,704	28,160	23,296
Realization	22,900	-	86,016	23,552	8,704	28,160	23,296
MOP							
Dosage	1.5 Kg (1x application)						
Recommendation	83,712	89,088	258,048	70,656	26,112	84,480	69,888
Realization	83,712	89,088	238,048	70,656	26,112	84,480	69,888
Dolomite							
Dosage	1.0 Kg (1x application)						
Recommendation	27,904	29,696	86,016	23,552	8,704	28,160	23,296
Realization	27,404	24,646	86,016	23,552	8,704	28,160	23,296

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HGFB							
Dosage	1.0 Kg (1x application)						
Recommen dation	2,900	2,970	8,602	2,355	538	2,816	2,330
Realization	2,790	2,970	8,602	2,355	538	2,816	2,330
2021							
Fertilizer recommen dation (Kg)	KUD Sawit Tambara Jaya	KUD Sumay Jaya	KUD Sawit Makmur	KUD Sumber Usaha	KUD Tanjung Aur Duri	KUD Tanjung Dani Sakti	KUD Belarik Jaya
AC							
Dosage	1.5 Kg (1x application)						
Recommen dation	83,712	89,088	258,048	70,656	26,112	84,480	69,888
Realization	83,712	89,088	258,048	70,656	26,112	84,480	69,888
RP							
Dosage	1.0 Kg (1x application)						
Recommen dation	27,904	29,696	86,016	23,552	8,704	28,160	23,296
Realization	27,904	29,696	86,016	23,552	8,704	28,160	23,296
MOP							
Dosage	1.5 Kg (1x application)						
Recommen dation	83,712	89,088	258,048	70,656	26,112	84,480	69,888
Realization	83,712	89,088	258,048	70,656	26,112	84,480	69,888
Dolomite							
Dosage	1.0 Kg (1x application)						
Recommen dation	27,904	29,696	86,016	23,552	8,704	28,160	23,296
Realization	27,904	29,696	86,016	23,552	8,704	28,160	23,296
HGFB							
Dosage	1.0 Kg (1x application)						
Recommen dation	2,790	2,970	8,602	2,355	538	2,816	2,330
Realization	2,790	2,970	8,602	2,355	538	2,816	2,330

		<p>Fertilizing program in Bungo Tebo Plasma 2021 has completed 100% as recommendation.</p> <p>Record of fertilizer issuance can be seen in "Bukti Permintaan Pemakaian Barang" (BPPD). For example:</p> <ul style="list-style-type: none"> - BPPD No.02/KLO/PPK/01/2021 dated 2 January 2021 for Hampan 19 KUD Tanjung Dani, fertilizer Dolomite, quantity 7,168 kg. The document signed by Secretary and Chairman of Koperasi, checked by Division Assistant and KTU, approved by Manager of Kebun Plasma Bungo Tebo. - BPPD No.03/KLO/PPK/08/2021 dated 2 August 2021 for Hampan 07 KUD Sawit Makmur, fertilizer MOP, quantity 9,600 kg. The document signed by Secretary and Chairman of Koperasi, checked by Division Assistant and KTU, approved by Manager of Kebun Plasma Bungo Tebo. 																									
<p>Criteria 7.5: Practices minimise and control erosion and degradation of soils.</p>																											
<p>7.5.1</p>	<p>(C) Maps that identify marginal and fragile soils, including steep sloped land are available.</p>	<p>Bungo Tebo POM and Estate</p> <p>PT Rigunas Agri Utama showed Peta Sebaran Satuan Tanah for Bungo Tebo Estate. The map indicated the predominant soil type consist of:</p> <table border="1" data-bbox="1016 962 1944 1386"> <thead> <tr> <th>Soil Classification</th> <th>Slope (%)</th> <th>Drainage</th> <th>Class of land</th> <th>Limitation Factor</th> <th>Hectare</th> </tr> </thead> <tbody> <tr> <td>Aquic Dystrudepts</td> <td>0-8</td> <td>Bad</td> <td>Suitable (S3)</td> <td>Drainage, nutrient retention</td> <td>143</td> </tr> <tr> <td>Typic endoaquults</td> <td>0-8</td> <td>Bad</td> <td>Suitable (S3)</td> <td>Drainage, nutrient retention, texture</td> <td>146</td> </tr> <tr> <td>Typic Hapludults</td> <td>8-15</td> <td>Good</td> <td>Suitable (S3)</td> <td>Drainage, nutrient</td> <td>14</td> </tr> </tbody> </table>	Soil Classification	Slope (%)	Drainage	Class of land	Limitation Factor	Hectare	Aquic Dystrudepts	0-8	Bad	Suitable (S3)	Drainage, nutrient retention	143	Typic endoaquults	0-8	Bad	Suitable (S3)	Drainage, nutrient retention, texture	146	Typic Hapludults	8-15	Good	Suitable (S3)	Drainage, nutrient	14	<p>Complied</p>
Soil Classification	Slope (%)	Drainage	Class of land	Limitation Factor	Hectare																						
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Typic Hapludults	8-15	Good	Suitable (S3)	Drainage, nutrient	14																						

					retention, texture			
		Typic Hapludults	15-30	Good	Suitable (S3)	Elevation, topography, nutrient available	754	
		Typic Hapludults	>30	Good	Not Suitable (N1)	Elevation, topography, nutrient available	1,574	
		Total					2,631	
		<p>There is also topographic map indicating the elevation of Bungo Tebo Estate consist of 0- 8% and >30%. The limitation for the area is steep slope on some area. PT Rigunas Agri Utama did not open the area with steep slope > 40%. Topography level consist of 45 – 105 m.</p> <p>Scheme Smallholder</p> <p>Asian Agri’s Research and Development Department has conducted soil survey semi detail in Smallholder Area of PT Rigunas Agri Utama on 2021 based on report “Laporan Update Analisa Tanah Kebun Plasma Bungo Tebo”. Based on the report found the soil taxonomy refer to USDA 2006 is typic hapludults.</p>						
7.5.2	The replanting of palm oil is not conducted extensively on steep terrain in accordance with applicable regulations.	Based and document verification and field observation, there is no extensive replanting activity in steep terrain both own estate and smallholder area.						Complied
7.5.3	New palm oil planting is not conducted on steep terrain in accordance with applicable regulations.	Based and document verification and field observation, there is no extensive replanting activity in steep terrain both own estate and smallholder area.						Not Applicable
<p>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.</p>								

<p>7.6.1</p>	<p>(C) Evidence of long-term land suitability for oil palm cultivation, soil maps or soil surveys that identify marginal and fragile soils, including steep terrain are available, in planning and operations.</p>	<p>Bungo Tebo Estate and POM:</p> <p>In procedure no. AA-SOP-OP-1100-05.R3 "Konservasi Tanah dan Air" has determined strategy control erosion particular in slope area, such as: 0 – 5°, 6 – 12°, 13 -20° and more than 20°. The company has applied silt pit, L shape stacking frond and terracing in slope area to reduce soil erosion.</p> <p>Based on soil analysis, there is no fragile soil in PT Rigunas Agri Utama – Bungo Tebo Estate. Based on Peta Sebaran Satuan Tanah for Bungo Tebo Estate the predominant soil type consists of: Aquic dystrodepts, Typic hapludults, Typic endoaquults.</p> <p>Latest Soil Analysis conducted based on Soil Analysis Report No.022/INT/R&D/AGT/S/19 dated 03/08/2019, with 12 samples analysed. Result sample no. 13S1489; Block Boring SP 7; Depth 15-30 cm; particle size: 27% coarse sand; 17% fine sand; 20% silt; 36% clay; 0.09% N; 0.87% organic C.</p> <p>PT Rigunas Agri Utama – Bungo Tebo Estate provides soil fertility test/soil type analysis based on Research and Development Asian Agri Group dated 09/04/2018. The soil type/classification result of Sentral Estate consist of 5 soil profil as below:</p> <ul style="list-style-type: none"> - Profil I Block D08i/2008, topography: flat 0 – 8 %, humidity regime: udic, Temperature regime: isohipertermik, drainage class: good, effective solum depth: >120 cm, ground water depth: 105 cm, epidedon: okrik, horizon: argilik, soil classification: typic endoaquults. - Profil II Block A94i/1994, topography: Hilly 33 %, humidity regime: udic, Temperature regime: isohipertermik, drainage class: good, effective solum depth: >120 cm, ground water depth: >120 cm, epidedon: okrik, horizon: argilik, soil classification: typic hapludults. - Profil III Block D08h/2008, topography: flat 0 – 8 %, humidity regime: udic, Temperature regime: isohipertermik, drainage class: good, effective solum depth: >120 cm, ground water depth: >120 cm, epidedon: okrik, 	<p>Complied</p>
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		<p>horizon: argilik, soil classification: typic endoaquults.</p> <ul style="list-style-type: none"> - Profil IV Block C17e/2017, topography: hilly 32 %, humidity regime: udic, Temperature regime: isohipertermik, drainage class: good, effective solum depth: >120 cm, ground water depth: >120 cm, epidedon: okrik, horizon: argilik, soil classification: typic hapludults. - Profil IV Block B96w/1996, topography: flat 0 – 8 %, humidity regime: udic, Temperature regime: isohipertermik, drainage class: good, effective solum depth: >120 cm, ground water depth: 120 cm, epidedon: okrik, horizon: kambik, soil classification: Aquic dystrudepts. <p>Bungo Tebo Estate has recorded use of nutrient recycling strategy by application of Empty Fruit Bunch (EFB), land application and use of palm residues after replanting. Dosage of EFB application in mature oil palm was 250 kg/palm/year and for immature plantation 125 kg/palm/year. Rotation for EFB application is 12 months.</p>	
7.6.2	Extensive planting on marginal and fragile soils is avoided or, if necessary, carried out according to the best-practice soil management plan.	During this audit, auditor has been confirmed that there is no new planting (land extension) of PT RAU or plasma area. It is only replanting activity that conducted in 2019. Replanting activity in steep area using a terrace contour for soil conservation.	Not Applicable
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	During this audit, auditor has been confirmed that there is no new planting (land extension) of PT RAU or plasma area. It is only replanting activity that conducted in 2019. Replanting activity in steep area using a terrace contour for soil conservation.	Not Applicable
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.	Based on soil analysis, there is no peat soil identify in PT Rigunas Agri Utama – Bungo Tebo Estate. Based on "Peta Sebaran Satuan Tanah" for Bungo Tebo Estate the predominant soil type consists of: Aquic dystrudepts, Typic hapludults, Typic endoaquults.	Not Applicable

7.7.2	Peat areas within the managed area are inventoried, documented and reported to the RSPO Secretariat (effective from November 15, 2018).	Based on soil analysis, there is no peat soil identify in PT Rigunas Agri Utama – Bungo Tebo Estate. Based on “Peta Sebaran Satuan Tanah” for Bungo Tebo Estate the predominant soil type consists of: Aquic dystrodepts, Typic hapludults, Typic endoaquults. No peat inventory needed for PT Rigunas Agri Utama – Bungo Tebo Estate.	Not Applicable
7.7.3	(C) Subsidence of peat is monitored, documented and minimised.	Based on semi-detailed soil map, there is no peat soil in Bungo Tebo Estate and scheme smallholder area.	Not Applicable
7.7.4	(C) Availability of implementation evidence of the water and land cover management program.	Based on semi-detailed soil map, there is no peat soil in Bungo Tebo Estate and scheme smallholder area.	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.	Based on semi-detailed soil map, there is no peat soil in Bungo Tebo Estate and scheme smallholder area. Not Applicable	Not Applicable
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).	According to soil map semi detail scale 1:50,000 and also verified during field visit, confirmed that there is no peat soil at area Bungo Tebo Estate and Plasma. Therefore, this indicator is not applicable.	Not Applicable

7.7.7	<p>(C) All peat areas not planted and reserved in managed areas (regardless of depth) are protected as 'peatland conservation areas'; unit of certification are prohibited from constructing drainage channels, building roads and new electricity lines on peatlands; unless if it is for a non-corporate land clearance. Peatlands are managed in accordance with 'RSPO Best Management Practices for the Management and Rehabilitation of Natural Vegetation related to Oil Palm Cultivation that already exists in Peatlands' (the latest version) along with relevant audit guidelines.</p>	<p>According to soil map semi detail scale 1:50,000 and also verified during field visit, confirmed that there is no peat soil at area Bungo Tebo Estate and Plasma.</p> <p>Therefore, this indicator is not applicable.</p>	Not Applicable
Criteria 7.8: Practices maintain the quality and availability of surface and groundwater.			
7.8.1	<p>A water management plan is available and is implemented to support efficient use of water sources and continuous availability and avoid negative impacts on other users in the catchment. The plan referred to contains the following matters:</p> <p>7.8.1a The unit of certification does not limit access to clean water or does not pollute the water used by the community.</p>	<p>PT Rigunas Agri Utama – Bungo Tebo POM and supply bases have established water management plan, consist of management water supply for domestic, water consumption and measurement of water quality. Identification water need as regulated in "Peraturan Menteri PU No.14/PRT/M/2010 (domestic consumption is 60 liters/person/day and water needed for mill processing, ground and surface water resources and its permit, management and monitoring waste water, included domestic waste water.</p> <p>The Company has a water management document, both in the estate and mill. Monitoring of water management has been implemented on a regular basis, such as surface water quality monitoring, that available in the RKL/RPL report. Company has conducted water quality analysis each semester to ensure the compliance against PP (Government Regulation) No. 82/2001 regarding water quality standard, the result shown that water quality is complies with national regulation. This conclude that the company does not pollute the water used by the community.</p> <p>Procedure of Water and Soil Conservation (SOP AA-APM-OP-1100.05. R1) has been established to maintain the quality and availability of water, protection and management of riparian buffer zones at or before replanting. Procedure</p>	Complied

		<p>mentioned that in 50 m on the left and right side of riparian buffer zones, agrochemical application is prohibited, used manual fertilizer application and river bank planted with erosion barrier crop ("vetiver" grass, <i>Pheronema canescens</i> and <i>Bamboosa sp</i>).</p> <p>Scheme Smallholders:</p> <p>The soil and water conservation in form of maintain soft weed by selective spraying (team TUS). The soft weed for natural cover crop – in order to maintain micro-climate and minimize surface run-off.</p> <p>Management of Plasma Bungo Tebo has issued the policy of prohibition of chemical application in riparian area according to "Memorandum No.02/EST-KLO/MEMO/X/17 dated 2 October 2017". Policy stated that to achieve the sustainable palm oil management in Plasma Bungo Tebo, Plasma Management prohibit the chemical application at riparian area 3 m at left and right side of river.</p>	
	<p>7.8.1b Workers have adequate access to clean water.</p>	<p>PT Rigunas Agri Utama provides clean water ground water (drilled well) for workers for Bungo Tebo Estate and clean water from Mill for Mill workers Housing. Regular water analysis was performed to monitor the water quality. Water analysis performed by accredited laboratory ITEC Solution Indonesia. Sample seen on Clean Water analysis (Ground Water) at emplacement, dated of analysis 20 April – 05 May 2021. Report of analysis No. D.04.453/LHU/2021 dated 5 May 2021, and for 2020 water analyzed performed by Sucofindo on 18 November 2020, standard refers to PermenKes No. 492/MENKES/PER/IX/2010, analysis result shown that all parameter analyzed are met with the standard.</p>	
<p>7.8.2</p>	<p>(C) Water courses and wetlands are protected, including the maintenance and restoration of riparian zones and other buffer zones during or before replanting, in accordance with the "RSPO Manual on BMPs for the management and rehabilitation of riparian reserves" (April 2017) or Simplified</p>	<p>Bungo Tebo POM & Estate:</p> <p>PT RAU – Bungo Tebo POM and Estate has establish the procedure "Pengelolaan Riparian AA-APM-OP-1100.21-R2 dated 7 December 2015. The procedure defined the criteria of riparian area, lake, spring water and protected</p>	<p>Complied</p>

	<p>Guide Management and Rehabilitation of Riparian Reserves (2018).</p>	<p>area. Each river determined the riparian zone 50 m on the left and right side the river with wide < 12m and 100 m for the river which wide >12 m. All riparian zone was sign by boundary poles and signboard. Riparian restoration performed in the critical/degraded area to enhance and rehabilitate the ecosystem. When the replanting activity performed, it was prohibited to conducted land preparation/clearing in riparian area.</p> <p>During field visit at Belangkai River (Afdeling 03, Block 18a) it can be demonstrated that in the riparian area there is no replanting activity. Protection of riparian areas also performed with no chemical crops care activities both fertilizer and herbicide spraying.</p> <p>Scheme Smallholder:</p> <p>Riparian Protection was established and described about buffer zone, riparian buffer and natural river. Plasma Bungo Tebo has a procedure to maintain and conserve the riparian under procedure "Restorasi Riparian dan Areal Disekitar Danau/Waduk atau Mata Air Lainnya AA-KL-12-EFP".</p> <p>Management of Bungo Tebo Plasma has conducted dissemination to farmer members related HCV, soil and water conservation, and good agriculture practice. Dissemination material was evident; HCV, soil and water conservation was focused on fertilizer and agrochemical application near the waterways; good agriculture practice focused on spraying activity must performed by TUS team from company worker and cannot be done by farmer themselves, prohibition of blanket spraying, FFB ripeness criteria, loose-fruit picking and importance of PPE.</p> <p>Management of Bungo Tebo Plasma has installed signboard "Batas Semprot" (spraying boundary) at minimum 3 meters from waterways. There are 2 type of signboard, which is (1) Prohibition of fertilizer and agrochemical application at < 3 meters from waterways; and (2) signboard to mark the boundary area. Plasma Bungo Tebo also has marking the boundary of riparian area by painting the tree.</p>	
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		<p>Management of Bungo Tebo Plasma has installed erosion anchor, made pile and planted "waru" (Hibiscus similis) and "ketapang" (Terminalia catappa) tree at the side of waterways.</p> <ul style="list-style-type: none"> - Bungo Tebo Plasma has conducted monitoring of kapling (smallholder area) condition regarding weed condition, spraying results, waterways boundary, signboard condition, and condition of vegetation as erosion anchor. Records of monitoring presented in document "Monitoring Pemeriksaan Kapling Petani", for example: monitoring to KUD Belarik Jaya on 5 august 2021 at Hamparan 31 and 33, KUD Sawit Makmur on 9 May 2021 at Hamparan 35 and 37, KUD Sawit Sumay Makmur on 20 September 2021 at Hamparan 07 and 11, KUD Sumay Jaya on 7 September 2020 at Hamparan 28 and 30, KUD Sumber Usaha on 3 September 2021 at Hamparan 100 and 102, KUD Tambara Jaya on 15 September 2021 at Hamparan 45 and 46, KUD Tanjung Aur Duri on 5 August 2021 at Hamparan 122 and KUD Tanjung Dani Sakti on 15 January 2021 at Hamparan 19 and 24. 					
7.8.3	<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>PT Rigunas Agri Utama has prepared a procedure to manage the palm oil mill effluent, under AA-MPMOP- 1400.13- R1. The process detail is from recovery tank into cooling pond, into acidification pond (anaerob bacteria activation) into primary anaerob pond (decomposition), secondary anaerobic pond. The purpose was to reduce BOD <100 ppm.</p> <p>Bunga Tebo POM has also prepared a work instruction for management of POME pond, under "Work Instruction Pengoperasian Kolam Limbah". The fresh palm oil mill effluent has processed in order to met "Keputusan Menteri Lingkungan Hidup No. 28 – 29 tahun 2003 which stated the parameter should be within pH 6-9; BOD 5,000 mg/Litre.</p> <p>The result of monitoring of effluent especially BOD in 2020 & 2021 are as below:</p> <table border="1" data-bbox="1016 1318 1928 1361"> <thead> <tr> <th data-bbox="1016 1318 1229 1361">Period</th> <th data-bbox="1229 1318 1928 1361">Parameter</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> </tr> </tbody> </table>	Period	Parameter			Complied
Period	Parameter						

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		BOD (mg/l)	COD (mg/l)	pH
2020				
Jan		1,610	2,85	7.40
Feb		726	1,510	7.90
Mar		1,610	2,087	8.00
Apr		-	-	-
May		-	-	-
Jun		604	1,566	8.60
Jul		1,915.30	4,367	8.50
Aug		359.48	2,569.33	8.50
Sept		958.66	3,387.26	8.04
Oct		651.51	2,191.65	7.30
Nov		454.90	1,679.25	6.06
Dec		321.64	1,032.77	8.10
2021				
Jan		593.10	1,793.12	7.00
Feb		400.41	1,210.40	8.00
Mar		120.20	319.96	7.80
Apr		1,082.56	2,175.52	7.58
May		396.61	1,134.88	7.04
Jun		703.78	2,059.90	7.49
Jul		Results pending as of during audit		

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		Aug	Results pending as of during audi	
		Sept	Results pending as of during audi	
<p>The monitoring of Palm Oil Mil Effluent has been analyzed by Accredited Laboratory "UPTD Laboratorium Lingkungan Dinas Lingkungan Hidup Provinsi Jambi (LP_413-IDN)" and "PT Jambi Lestari Internasional (LP-1129-IDN)".</p> <p>During April – May 2020 the POME analysis cannot be done by laboratory due to Pandemic Covid-19 so that the laboratory was not operated during that period. During audit onsite conducted, the results of the analysis of waste water (POME) for the period July – September 2021 have not yet been released and sent by the relevant laboratory.</p> <p>From the analysis result can be shown that generally the parameter analyze has met with the standard of Land application permit. For period April – May 2020, the waste water analysis could not be done due to Covid-19 Pandemic circumstances. The laboratory does not operate temporarily and does not accept laboratory analysis. This is in accordance with the Notification Letter from Dinas Lingkungan Hidup Provinsi Jambi Nomor: 033/DLH-5.1/III/2020 dated 31 March 2020. Based on the notification letter, it is stated that the Environmental Laboratory UPTD as of April 5 - May 29, 2020 cannot serve sample testing requests.</p> <p>PT Rigunas Agri Utama has regularly reported the analysis result of POME to "Dinas Lingkungan Hidup Kabupaten Tebo & Provinsi Jambi" – Environmental Agency- on six (6) months bases under Report of RKL-RPL. Latest report period January – June 2021 are available and has been sent to the government on 2 August 2021 to Dinas Lingkungan Hidup Kab. Tebo & Dinas Perkebunan Kab Tebo), 3 August 2021 to Dinas Lingkungan Hidup Provinsi Jambi dan Kementrian Lingkungan Hidup dan Kehutanan (KLHK). Evidence of report submission can be shown as per "Daftar Distribusi Eksternal" and "Tanda terima Elektronik Sistem Informasi Pelaporan Elektronik Lingkungan Hidup (SIMPEL) to KLHK Number 1627974499-443.</p>				

7.8.4	Mill water use per tonne of FFB is monitored and recorded.	<p>Mill water use per tonnage of FFB has monitored in monthly bases. Result of monitoring of mill water use per tonnage of FFB has sighted in January to December 2020 and January – September 2021.</p> <p>The following is mill water use per tonnage of FFB since January – December 2020 and January – September 2021, the budget for process water use is determined as 1.23 M3/ton FFB processed.</p> <table border="1" data-bbox="1016 587 1930 1385"> <thead> <tr> <th>Period</th> <th>Water consumption for FFB production (m³/ton FFB)</th> </tr> </thead> <tbody> <tr> <td colspan="2">2020</td> </tr> <tr> <td>Jan</td> <td>0.89</td> </tr> <tr> <td>Feb</td> <td>0.90</td> </tr> <tr> <td>Mar</td> <td>0.90</td> </tr> <tr> <td>Apr</td> <td>0.96</td> </tr> <tr> <td>May</td> <td>1.20</td> </tr> <tr> <td>Jun</td> <td>1.10</td> </tr> <tr> <td>Jul</td> <td>0.95</td> </tr> <tr> <td>Aug</td> <td>0.89</td> </tr> <tr> <td>Sep</td> <td>0.92</td> </tr> <tr> <td>Oct</td> <td>0.84</td> </tr> <tr> <td>Nov</td> <td>0.87</td> </tr> <tr> <td>Dec</td> <td>0.84</td> </tr> <tr> <td colspan="2">2021</td> </tr> <tr> <td>Jan</td> <td>0.89</td> </tr> </tbody> </table>	Period	Water consumption for FFB production (m ³ /ton FFB)	2020		Jan	0.89	Feb	0.90	Mar	0.90	Apr	0.96	May	1.20	Jun	1.10	Jul	0.95	Aug	0.89	Sep	0.92	Oct	0.84	Nov	0.87	Dec	0.84	2021		Jan	0.89	Complied
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Feb	0.95																		
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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>PT Rigunas Agri Utama has shown the document a plan for improving efficiency of the use of fossil fuels and to optimizer renewable energy under document of "Pemakaian Energi Pabrik Bungo Tebo 2020".</p> <p>Energy use records include accurate measurements of renewable energy use per tonnage of FFB processed. Fossil fuel usage recorded for operational purpose, including the efficiency analysis. Below are the fossil fuel usage and renewable energy usage by Bungo Tebo POM:</p> <p>January – December 2020:</p> <ul style="list-style-type: none"> - Total Shell and fiber usage: 2,141 ton - Total fossil fuel usage: 173,788 L - Total energy generated from renewable energy: 21,560 Giga Joule 	Complied																

		<ul style="list-style-type: none"> - Total energy generated from fossil fuel: 1,313 Giga Joule - Fossil fuel substitute (converted) by renewable energy: 5,989,004 L. <p>January – September 2021:</p> <ul style="list-style-type: none"> - Total Shell and fiber usage: 2,141 ton - Total fossil fuel usage: 157,820 L - Total energy generated from renewable energy: 21,560 Giga Joule - Total energy generated from fossil fuel: 1,313 Giga Joule - Fossil fuel substitute (converted) by renewable energy: 5,989,004 L <p>PT Rigunas Agri Utama already maximize the renewable energy use. All oil palm shell and fibred consumed internally as boiler fuel In 2020 and 2021, the program to minimize the fossil fuel usage, such as:</p> <ol style="list-style-type: none"> 1. Minimize the usage of diesel fuel of heavy equipment (bachoe loader) at Bungo Tebo POM by installing a grading table so that the activity of FFB lifting to the loading ramp using heavy equipment can be reduced and it is enough to be done manually by workers from the grading table. Fossil fuel minimize from 4,119 L per year to become 3,000 L per year. 2. Minimize the usage of diesel fuel of heavy equipment at Bungo Tebo Estate by reduce mobilization of heavy equipment from Sei Lalo to the central traction (workshop) with distance 20 Km, so that can be reduce the fossil fuel usage 4,000 L a year. 3. Minimize the usage of diesel fuel of heavy equipment at Bungo Tebo Estate by replacing the use of graders in for maintenance road block trench with scraper tractors. The fossil fuel reduce by 10 L/HM. 4. Shutting down the generator set on holiday at 12.00 – 13.00 5. Reduce the generator set usage during turbine operation 6. Reduce the electricity usage by: <ul style="list-style-type: none"> - Change the electricity source from generator set to be PLN electricity. 	
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		<ul style="list-style-type: none"> - Determined and install the MCB with only 2 ampere in each house. - Replace the lamp TL/SL with high watt to become low watt (LED lamp). 	
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	(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>PT Rigunas Agri Utama – Bungo Tebo POM has a Standard Operating Procedure “Manajemen dan Metode Menghitung Emisi Gas Rumah Kaca (GHG) AA-MPMOP-1400.19.R1”, dated 3 January 2014. The procedure explains the management and method to calculate greenhouse gas emission.</p> <p>The management plan through avoiding planting on high carbon stock area, increase the carbon sequestration, reducing use of fossil fuel, implementing zeroburning policy in all company operation, using technology to minimize GHG emission (e.g. methane capture).</p> <p>Currently company has implemented:</p> <ul style="list-style-type: none"> - Avoidance planting on high carbon stock area: planting oil palm on mineral soil (land suitability report); Bungo Tebo Estate conserve all riparian area at Lalo river, Pinang river, Belangkai Purun, Rotan river, Benanai, Belangkai, Belangkai Purun, Benanai Pul river. - Increase the carbon sequestration: based on PalmGHG monitoring 2019 & 2020, the own crop sequestration indicating 23,585.76 tCO₂e; - Reducing use of fossil fuel; Bungo Tebo POM has use 100% fibre and most of shell as a boiler fuel; Replace the generator set usage for electricity by PLN to reduce the diesel fuel, currently company has use electricity from PLN at Sei Lalo & Pulai housing (192 house) - Implementing zero burning policy: replanting with mechanical method, no burning evident during field visit; - Introduce technology to minimize GHG emission: plan to install methane capture/biogas plant 	Complied

		<ul style="list-style-type: none"> - Monitoring of GHG emission planned for annual basis, which will act as basis for decision-making. <p>Bungo Tebo POM wastewater has processed through a series of wastewater treatment ponds: one cooling pond, one acid pond, two anaerobic ponds, one aeration pond, one sediment pond, and three buffer ponds. Process parameter monitoring and maintenance of the ponds has sighted. Quality of wastewater effluent has monitored quarterly in line with the requirements.</p> <p>The results of wastewater effluent monitoring has reviewed including measurement of BOD; the result of discharge effluent conforms to the limits for parameters.</p> <p>Scheme Smallholder:</p> <p>Significant pollutant and GHG emission from Smallholders block management is pollution from FFB transport (truck), Fertilizer and Herbicides application.</p> <ul style="list-style-type: none"> - FFB transport (truck) produce gas emission from fuel combustion. - Fertilizer will supply significant GHG emission, such as NOx, CO, etc. - Herbicides application will affect or threat watercourses. <p>Plan to reduce its pollution and emission through:</p> <ul style="list-style-type: none"> - Optimization on FFB transportation during harvesting cycle at smallholders block. - Applying fertilizer appropriately following the company recommendation on dosage per oil palm. <p>Reusing fertilizer bag for loose fruit during harvesting. Supervising during herbicide application where applied close to watercourses.</p>	
7.10.2	<p>(C) Since 2014, an estimate of carbon stocks in the proposed development area has been carried out along with potential sources of emissions that can occur directly as a result of the development and plans to minimize these emissions are</p>	<p>PT Rigunas Agri Utama Bungo Tebo has been planted since 1994, 1995 and 1996. Even though from the planting year, there was planting year 2008. Based on document verification, field visit and interview with stakeholders, it was known that the 512 Ha planted in 2008 was replanting oil palm. The</p>	<p>Not Applicable</p>

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	prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).	replanting occurred due to low SPH (Stand per Hectare) caused by elephant attack, during early stage of planting. Replanting has been performed by Bungo Tebo Estate since 2016 and finished in 2019. Total replanting in 2016 was 295 ha, in 2017 was 449 ha and in 2018 was 447 ha. This indicator is not applicable since there is no new planting after 2014 in PT Rigunas Agri Utama – Bungo Tebo Estate and Scheme Smallholder.	
7.10.3	(C) Other significant pollutant identification results are available and plans to reduce or minimize them are implemented and monitored.	PT Rigunas Agri Utama has conducted monitoring of emission, and then calculate it using RSPO PalmGHG Calculator Version 4. The monitoring and calculation covering estate, smallholder and mill operation. Emission reduction has achieved. PT Rigunas Agri Utama has also prepared a strategy to reduce and mitigate pollution and emission. Monitoring of pollution and emission quality for plantation has planned and implemented, e.g. air quality ambient for boiler and generator, water quality test for river (upstream and downstream), effluent water quality, noise, etc. Monitoring of any pollutant has done in daily, weekly and monthly basis, report of monitoring recorded in the RKL/RPL" report, and this report submitted to the related institution/government body every 6 month. There was available result of monitoring and calculation of pollutant and emission using Palm GHG Calculator. Emissions per product from estate and mill activities for year 2019 are: 1.05 tCO2e/ton CPO and 1.05 tCO2e/ton PKO and emission for year 2020 are: 0.98 tCO2e/ton CPO and 0.98 tCO2e/ton PKO.	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.	Bungo Tebo Estate: It was noted that Bungo Tebo Estate has conducted last replanting activities in 2019 area of 455 ha by contractor: Bahtera Mulia Lestari – SPK No. 012/P2KUK/01/18, Andalan Makmur Sejahtera – SPK No. 013/P2KBN/01/18, Selamat Mandiri Pratama – SPK No. 014/P2KBN/01/18. Replanting performed	Complied

		<p>without burning. All the replanting activities requires to be documented and monitored, such as: Schedule of replanting (chipping, digging and planting), progress planting LCC (Legume Cover Crop) and Minutes Works replanting (Contractor Work Progress).</p> <p>Procedure of Replanting was documented in SOP AA-APM-OP-1100.20-R6 dated 16 February 2017. The procedure described the company commitment to "Zero Burning" by using chipping and stacking using excavator by bucket modification. Procedure of replanting mentioned that Field Assistant, Head Assistant and Estate Manager must perform checks to ensure that the contractor does not perform burning for land preparation for replanting. In the procedure of replanting mentioned that, the methods used are: Toppling trees using heavy equipment (excavators); Chipping: cutting palm trunk, so as not infected with Ganoderma; Planting LCC, so that the decay of the old oil palm trunks can be faster; Planting of oil palm. This method has been used in replanting the whole plantation belonging to Asian Agri group including PT RAU – Bungo Tebo Estate.</p> <p>The company has established Company Policy signed by Managing Director, Kevin Tio, on 1 December 2014. Point 6 of the policy stated the company uses Zero Burning practice in developing plantation and actively support initiative to prevent and monitor forest fire and haze.</p> <p>Based on field observation, it was evident that no fire has been used for replanting in Bungo Tebo Estate.</p> <p>Scheme Smallholder:</p> <p>The Smallholder Manager has prepared the policy that there were no land preparation by burning, as per "Kebijakan Koperasi", for example Kebijakan Koperasi KUD Sawit Tambara Jaya, KUD Belarik Jaya, KUD Sumay Makmur, KUD Sumay Jaya, KUD Tambara Jaya, KUD Sawit Makmur, KUD Sumber Usaha dated 4 January 2021 at point 6: "Melakukan praktek tanpa bakar dalam</p>	
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		<p>kegiatan pembangunan perkebunan dan petani maupun desa secara aktif mendukung inisiatif mencegah mengawasi kebakaran hutan dan asap” (Implementing non-burning practices in plantation development activities, farmers and villages actively support initiatives to prevent and control forest fires and smoke).</p> <p>It was noted that at Plasma Bungo Tebo - KUD has conducted last replanting activities in 2020 area of 82 ha by contractor CV Selamat Mandiri Pratama – SPK No. 491R/P3KLO/09/20 dated 14 September 2020. Replanting performed without burning. All the replanting activities requires to be documented and monitored, such as: Schedule of replanting (chipping, digging and planting), progress planting LCC (Legume Cover Crop) and Minutes Works replanting (Contractor Work Progress).</p> <p>The document related contractor work progress has verified during audit, for example: Document of “Berita Acara Hasil Kerja Kontraktor” dated 17 December 2020 by CV Selamat Mandiri Pratama period 28 August – 17 December 2020, Land Clearing area of 16.25 Ha, “Berita Acara Hasil Kerja Kontraktor” has been verified by Assistant and Head Of Administration (KTU) and approved by Senior Manager.</p> <p>The policy has communicated to individual member and available in guidance book (Buku Panduan dan Catatan) which distributing to all farmers as well as the information display on the notice board in filed also emphasize on the no use of fire policy. During interview with smallholder member in KUD Sumay Jaya, KUD Sumber Usaha, KUD Sawit Tambara Jaya, KUD Tanjung Aur Duri, KUD Sawit Makmur, KUD Sawit Sumay Makmur, KUD Belarik Jaya and KUD Tanjung Dani Sakti indicated that they have understanding on zero burning policy.</p>	
7.11.2	The unit of certification establishes fire prevention and control measures for lands that are directly managed by the unit of certification.	<p>Bungo Tebo POM, Estate & Smallholder: PT Rigunas Agri Utama has performed and establishes fire prevention and control measures for whole area of company. Fire monitoring was done daily</p>	Complied

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		<p>by Fire team and security to monitor the hotspot and fire by patrol to critical area of plantation. Maps of fire critical area has been developed and determined by company and monitor accordingly as per "Peta Area Rawan Kebakaran PT RAU – Kebun Bungo Tebo". According to hotspot monitoring period 2020 and 2021 shown that there is no hotspot identified at Bungo Tebo Estate.</p> <p>In addition, company implementing fire danger rating as early warning system. According to monitoring result since Sem I-II 2020 and Semester I 2021, generally fire danger rating categorized as low risk.</p> <p>Basic fire training also has been performed to increase the competency of workers particularly for emergency response team. Latest basic fire training conducted on 11 April 2019 (attended by 26 persons) and refresh training on 28 March 2021 in collaboration with the Polres Tebo has attended by 30 persons.</p> <p>Tools and equipment of fire prevention has been prepared by company as per "Data Standar Peralatan Dalkarhutla Perusahaan Perkebunan" refers to Permentan RI No.05/2018, for example:</p> <table border="1" data-bbox="1016 943 1930 1391"> <thead> <tr> <th>No.</th> <th>Tools</th> <th>Unit</th> <th>Std. (<i>Permentan RI No.05/2018</i>)</th> <th>Actual</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Helm</td> <td>pcs</td> <td>30</td> <td>30</td> </tr> <tr> <td>2</td> <td>Head Lamp</td> <td>pcs</td> <td>30</td> <td>30</td> </tr> <tr> <td>3</td> <td>Uniform</td> <td>pcs</td> <td>30</td> <td>30</td> </tr> <tr> <td>4</td> <td>First aid kit</td> <td>pcs</td> <td>4</td> <td>4</td> </tr> <tr> <td>5</td> <td>Kapak Dua Fungsi</td> <td>pcs</td> <td>8</td> <td>9</td> </tr> <tr> <td>6</td> <td>Pump (25 Hp)</td> <td>pcs</td> <td>2</td> <td>2</td> </tr> <tr> <td>7</td> <td>Pump (5 Hp)</td> <td>pcs</td> <td>4</td> <td>4</td> </tr> <tr> <td>8</td> <td>GPS</td> <td>pcs</td> <td>4</td> <td>4</td> </tr> </tbody> </table>	No.	Tools	Unit	Std. (<i>Permentan RI No.05/2018</i>)	Actual	1	Helm	pcs	30	30	2	Head Lamp	pcs	30	30	3	Uniform	pcs	30	30	4	First aid kit	pcs	4	4	5	Kapak Dua Fungsi	pcs	8	9	6	Pump (25 Hp)	pcs	2	2	7	Pump (5 Hp)	pcs	4	4	8	GPS	pcs	4	4	
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8	GPS	pcs	4	4																																												

		<p>The activity of fire prevention and control present in "Laporan Pencegahan Pencemaran dan atau Kerusakan Lingkungan Hidup yang Berkaitan dengan Kebakaran Lahan" for period 2020 and 2021. Report of fire prevention and control are submitted to related authority (Dinas Lingkungan Hidup & Dinas Perkebunan) each semester, for example Semester I 2021 to Dinas Perkebunan, Peternakan dan Perikanan Kabupaten Tebo has reported on 21 October 2021.</p>	
<p>7.11.3</p>	<p>The unit of certification engages stakeholders in adjacent locations for fire prevention and control measures.</p>	<p>Bungo Tebo POM and Estate: PT RAU Bungo Tebo has a programme namely "Desa Bebas Api / Fire Free Village Programme (FFVP). The MoU regarding "Desa Bebas Api" Program has been signed with Tuo Sumay Village, Teriti Village, Suo-Suo Village, Muara Sekalo Village and Semambu Village on 9 June 2021. PT RAU recognize this engagement program, comprises the following segments:</p> <ul style="list-style-type: none"> a. Increase community awareness. Company conduct intensive communication with the local community to increase awareness on the impact of fire and haze on health. b. Empowerment village head. During the dry season, villages play a significant role to synergize the prevention and mitigation of land fire. c. Provide support for land clearing. d. Appreciation for zero burning. e. Assistance to enhance local economy. <p>Several programs have been implemented, for example: reward/appreciation on 13 October 2021 for Semambu Village related to the achievement of a village that is free of land fires and assistance of fire engine (1 unit) for the Teriti Village, Tuo Sumay Village, SuoSuo Village, Semambu Village and Muara Sekalo Village on 1 July 2020.</p> <p>Regular and continuous basic fire training has been delivered by Fire Team of Asian Agri to Masyarakat Peduli Api. Latest training conducted on 11 April 2019</p>	<p>Complied</p>

		<p>(attended by 26 persons) and refresh training on 28 March 2021 in collaboration with the Polres Tebo has attended by 30 persons.</p> <p>Scheme Smallholder:</p> <p>The Smallholder Manager has prepared the policy that there were no land preparation by burning, as per "Kebijakan Koperasi", for example Kebijakan Koperasi KUD Sawit Tambara Jaya, KUD Belarik Jaya, KUD Sumay Makmur, KUD Sumay Jaya, KUD Tambara Jaya, KUD Sawit Makmur, KUD Sumber Usaha dated 4 January 2021 at point 6: "Melakukan praktek tanpa bakar dalam kegiatan pembangunan perkebunan dan petani maupun desa secara aktif mendukung inisiatif mencegah mengawasi kebakaran hutan dan asap" (Implementing non-burning practices in plantation development activities, farmers and villages actively support initiatives to prevent and control forest fires and smoke).</p> <p>The policy has communicated to individual member and available in guidance book (Buku Panduan dan Catatan) which distributing to all farmers as well as the information display on the notice board in filed also emphasize on the no use of fire policy.</p> <p>Fire monitoring and patrol has been performed weekly and depend on the condition during dry season. Evidence of monitoring present in "Monitoring Patroli Api" sample seen for KUD Sumay Jaya, KUD Sumber Usaha, KUD Sawit Tambara Jaya, KUD Tanjung Aur Duri, KUD Sawit Makmur, KUD Sawit Sumay Makmur, KUD Belarik Jaya and KUD Tanjung Dani Sakti.</p>	
<p>Criteria 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.</p>			
<p>7.12.1</p>	<p>(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCV or HCS forests.</p>	<p>PT Rigunas Agri Utama - Bungo Tebo has been planted since 1994, 1995 and 1996. Even though from the planting year, there was planting year 2008. Based on document verification, field visit and interview with stakeholders, it was known that the 512 Ha planted in 2008 was replanting oil palm. The</p>	<p>Not Applicable</p>

	<p>Historical analysis of Land Use Change Analysis (LUCA) is carried out before any new land clearing, in accordance with the RSPO LUCA Guidance document (see indicator 7.12.2).</p>	<p>replanting occurred due to low SPH (Stand per Hectare) caused by elephant attack, during early stage of planting. Replanting has been performed by Bungo Tebo Estate since 2016 and finished in 2019. Total replanting in 2016 was 295 ha, in 2017 was 449 ha, in 2018 was 447 ha and 2019 was 787 ha. This indicator is not applicable since there is no new planting after 2005 in PT Rigunas Agri Utama – Bungo Tebo Estate and Scheme Smallholder.</p>	
<p>7.12.2</p>	<p>(C) HCV and HCS forests, and other conservation areas are identified as follows: 7.12.2a) For existing plantations, with an HCV assessments conducted by RSPO- approved assessors and have no new land clearing after 15 November 2018, the existing HCV assessments remains valid.</p>	<p>Company including scheme smallholder has conducted HCV identification in coordination with Faculty of Forestry from IPB (Bogor Agricultural University). The identification result recorded and reported under "Laporan Akhir Identifikasi Keberadaan Nilai Konservasi Tinggi (NKT) di areal PT Rigunas Agri Utama, Kabupaten Tebo". The scope of study covers nucleus estate of PT Rigunas Agri Utama plantation (covers 2,551 Ha) and smallholder estate/plantation (covers 5,914 Ha), located in Sumay District, Rambai District and Serai Serumpun District. The HCV identification was using Guidance on Identification of HCV in Indonesia, published by "Konsorsium Revisi HCV Toolkit Indonesia", July 2008. The assessor of HCV consist of:</p> <ul style="list-style-type: none"> - Dr. Ir. H. Nyoto Santoso, MS.: Team Leader, listed as RSPO HCV Assessor (listed as Provisionally Licensed Assessor, dated 23 April 2015); - Udi Kusdinar, S.Hut.: Social and Cultural aspects, listed as RSPO HCV Assessor. - Sulfan Ardiansyah, S.Hut.: Flora Ecology and Environmental Services, listed as RSPO HCV Assessor. - M. Syayidina Ali, Amd.: GIS (listed as Provisionally Licensed Assessor, dated 23 April 2015). - Gilang Prastya Pambudi, S.Hut.: Social-cultural aspect, listed as RSPO HCV Assessor. 	<p>Complied</p>

		<p>The HCV identification survey was carried out on 23 – 27 April 2013. The involvement of interested parties in form of interview, discussion and/or public consultation. For example: Discussion with authorities of Serai Serumpun district, interview with Pinang Belai Village, discussion with villagers of Sekutur Jaya Village, interview with committee of KUD Sumai Makmur, interview with Sumay District public servants, interview with villagers of Sungai Rambai Village, etc.</p> <p>The public consultation was carried out on 26 April 2013, located in “Balai Kecamatan Serai Serumpun”, which attended by 28 participants, representing village authorities, villagers, elderly and community figures, district head and KUD Plasma.</p> <p>Company has in cooperation with community for the management of HCV, as written in Statement “Pernyataan Bersama” signed by PT Rigunas Agri Utama’s management, six (6) village heads and 9 leaders of KUD. The statement was stating commitment towards: to protect wildlife inside the scheme smallholder plantation SP1 – SP7, and agreed to no-hunting policy; Community agreed to stop the use of poison and electricity to catch fish; To protect river buffer zone through: no chemical fertilizer application, using organic fertilizer, to plant river buffer zone with local species tree – and to nurture/maintain the tree; no use of open-fire in scheme smallholder plantation; to actively participate in electric fence program to drive away elephant; to communicates the policy to communities. The statement was signed on 26 April 2013 by all representatives.</p>	
	<p>7.12.2 b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the latest HCSA Toolkit and HCV-HCSA Assessment Manual that is applicable at the time of the assessment. This includes stakeholder consultation and take into account wider landscape- level consideration.</p>	<p>HCV identified in Bungo Tebo Estate (17.59 ha) consist of:</p> <ul style="list-style-type: none"> - HCV 1.2, HCV 4.1 in Riparian area Lalo river, Pinang river, Belangkai Purun, Rotan river, Benanai, Belangkai, Belangkai Purun, Benanai Bul river with area 17.54 Ha. - HCV 6, graveyard in Division III area, 0.05 Ha. <p>HCV identified in Bungo Tebo Plasma consist of:</p>	

		<ul style="list-style-type: none"> - HCV 1.2 and 4.1 in Riparian area of river Kebung, Lawai, Sukorejo, Sekutur, Lalo, Benanai, Benanai Bul, Belangkai, Cenio, Anak Batang Sumay with area 52.04 ha. The HCV area was located in surrounding scheme smallholder plantation and outside of smallholder plots/block. <p>RTE species identified in area Bungo Tebo Estate and Plasma are as follows:</p> <ul style="list-style-type: none"> - Kucing kuwuk (<i>Prionailurus bengalensis</i>) - Lutung (<i>Presbytis melalophos</i>) - Lutung abu – abu (<i>Trachypithecus cristatus</i>) - Berang-berang (<i>Prionodon linsang</i>) - Gajah (<i>Elephas maximus</i>) - Pijantung kecil (<i>Arachnotera longirostra</i>) - Raja udang meninting (<i>Alcedo meninting</i>) - Elang hitam (<i>Ictinaetus malayensis</i>) - Burung madu kelapa (<i>Anthreptes malaccensis</i>) - Elang ular bido (<i>Spilornis cheela</i>) - Kipasan belang (<i>Rhipidura javanica</i>) - Cekakak belukar (<i>Halcyon smirnensis</i>) - Cekakak sungai (<i>Halcyon chloris</i>) - Burung madu sepah raja (<i>Aethopyga siparaja</i>) <p>There is no new land clearing (in existing plantations or new plantings) after 15 November 2018.</p> <p>PT Rigunas Agri Utama Bungo Tebo has been planted since 1994, 1995 and 1996.</p> <p>Replanting has been performed by Bungo Tebo Estate since 2016 and finish in 2019. Total replanting in 2016 was 295 ha, in 2017 was 449 ha and in 2018 was 447 ha, and 2019 was 787 ha. The rest planted area 512 Ha planted in</p>	
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		2008 was also replanting oil palm due to low SPH (Stand per Hectare) caused by elephant attack, during early stage of planting.	
7.12.3	(C) In High Forest Cover Landscapes (HFCLs) within HFCCs, a specific procedure will apply for legacy cases and development by indigenous peoples and local communities with legal or customary rights, taking into consideration regional and national multi-stakeholder processes. Until this procedure is developed and endorsed, 7.12.2 applies.	According to HCV assessment on April – May 2013 it was confirmed that there is no High Forest Cover Landscapes (HFCLs) identified in the concession area of PT Rigunas Agri Utama and Scheme Smallholder. It was also confirmed during onsite audit. This indicator is not applicable.	Complied
7.12.4	(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An Integrated management plans to protect and/or enhance HCV and HCS forests, peatland and other conservation areas are developed, implemented and adapted if necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan was developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).	PT Rigunas Agri Utama - Bungo Tebo has been planted since 1994, 1995 and 1996. Replanting has been performed by Bungo Tebo Estate since 2016 and finished in 2019. Total replanting in 2016 was 295 ha, in 2017 was 449 ha, in 2018 was 447 ha and 2019 was 787 ha. Company has prepared Conservation Management Plan 2020, detailing location of HCV area, hectare of HCV area, management objective, management program, method, person in charge, target of implementation and monthly status. Company has consistently monitors the status of HCV area, as well as protected flora and fauna species. This is recorded in "Laporan Monitoring Tumbuhan dan Satwa Liar PT Rigunas Agri Utama" period Semester I & II 2020 and Semester I 2021. Monitoring period January – June & July - December 2020 and January – June 2021. The report explains the monitoring on status of plant and wildlife, disturbance and damage to the protected area. Wildlife observations are conducted monthly by Mandor HCV in each Afdeling. Observation result since January to December 2020 and January - September 2021 documented in the "Daftar Temuan satwa liar di areal kebun PT Rigunas Agri Utama". Based on monitoring result since January – December 2020 and January – June 2021, there were still found the RTE species consist of: Elang ular bido (<i>Spilornis cheela</i>), Burung raja udang (<i>Pelargopsis capensis</i>), Kucing hutan (<i>Felis bengalensis</i>), Ular kobra (<i>Naja sumatrana</i>), Monyet Ekor Panjang (<i>Macaca fascicularis</i>), Cekakak belukar (<i>Halcyon smyrnensis</i>), Cekakak sungai (<i>Todirhamphus chloris</i>), Monyet ekor panjang (<i>Macaca fascicularis</i>). Specific	Not Applicable

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		monitoring for elephant was done through patrol on areas where indicated as elephant range/path. The patrol carried out on daily basis and reported under "Laporan Monitoring Serangan Gajah". Based on report review, in 2020 & 2021, there was no elephant attack.	
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.	According to HCV assessment on April – May 2013 it was confirmed that there is no HCV identified in the land of local communities. It was also confirmed during onsite audit. This indicator is not applicable.	Not Applicable
7.12.6	All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.	Company and cooperative were working together to monitor elephant movement and drive away elephant (if comes to plantation). Record seen: "Pemantauan Serangan Gajah Afdeling IV KBT Tahun 2020 & 2021", was based on daily patrol. Based on report dated January – December 2020 and January – September 2021, there was no elephant attack in Division IV. The record was in line with statement from farmers, village authorities and local communities. Based on the interview, community was stating that since early 2014, there was no more elephant attack. Based on document verification upon "Laporan hasil monitoring Pengelolaan Tumbuhan dan Satwa" period Semester I 2020 shows in the area of Bungo Tebo Estate identified 4 types of protected under IUCN and CITES. Report of HCV semester I & II year 2020 and semester I year 2021 has been submitted to BKSDA Provinsi Jambi. Evidence of report submission can be shown during audit. Bungo Tebo Estate also has monitoring the RTE species each month as present in "Daftar Temuan Satwa Liar di Areal Kebun PT Rigunas Agri Utama". Based on monitoring result since January – December 2020 and January – June 2021, there were still found the RTE species consist of: Elang ular bido (<i>Spilornis cheela</i>), Burung raja udang (<i>Pelargopsis capensis</i>), Kucing hutan (<i>Felis bengalensis</i>), Ular kobra (<i>Naja sumatrana</i>), Monyet Ekor Panjang (<i>Macaca</i>	Complied

		<p>fascicularis), Cekakak belukar (<i>Halcyon smyrnensis</i>), Cekakak sungai (<i>Todirhamphus chloris</i>), Monyet ekor panjang (<i>Macaca fascicularis</i>).</p> <p>Company also installed identity signboard and warning signboard to educate the workforce and surrounding community regarding the protection of RTE species.</p> <p>Socialization of HCV and RTE species protection has been carried out by the company both to internal company employees and to the surrounding community. The last socialization to internal company employees was held on August 7, 2020. Socialization to communities around the plantation was also carried out on July 13, 2020 (Desa Sekutur Jaya). Evidence of socialization can be shown. The company also posted information boards and appeals regarding the protection of local protected areas, a ban on hunting for animals and destroying areas and other conservation campaigns.</p>	
7.12.7	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p>	<p>There is no new planting after November 2005.</p> <p>PT Rigunas Agri Utama Bungo Tebo has been planted since 1994, 1995 and 1996. Even though from the planting year, there was planting year 2008. Based on document verification, field visit and interview with stakeholders, it was known that the 512 Ha planted in 2008 was replanting oil palm. The replanting occurred due to low SPH (Stand per Hectare) caused by elephant attack, during early stage of planting.</p> <p>Replanting has been performed by Bungo Tebo Estate since 2016 and finished in 2019. Total replanting in 2016 was 295 ha, in 2017 was 449 ha, in 2018 was 447 ha and 2019 was 787 ha.</p> <p>Company including scheme smallholder has conducted HCV identification in coordination with Faculty of Forestry from IPB (Bogor Agricultural University) on April – May 2013.</p> <p>Company has prepared Conservation Management Plan 2020, detailing location of HCV area, hectare of HCV area, management objective, management program, method, person in charge, target of implementation and monthly status. Company has consistently monitors the status of HCV</p>	<p>Not Applicable</p>

		<p>area, as well as protected flora and fauna species. This is recorded in "Laporan Monitoring Tumbuhan dan Satwa Liar PT Rigunas Agri Utama" period Semester I & II 2020 and Semester I 2021. Monitoring period January – June & July - December 2020 and January – June 2021. The report explains the monitoring on status of plant and wildlife, disturbance and damage to the protected area. Wildlife observations are conducted monthly by Mandor HCV in each Afdeling. Observation result since January to December 2020 and January - September 2021 documented in the "Daftar Temuan satwa liar di areal kebun PT Rigunas Agri Utama". Based on monitoring result since January – December 2020 and January – June 2021, there were still found the RTE species consist of: Elang ular bido (<i>Spilornis cheela</i>), Burung raja udang (<i>Pelargopsis capensis</i>), Kucing hutan (<i>Felis bengalensis</i>), Ular kobra (<i>Naja sumatrana</i>), Monyet Ekor Panjang (<i>Macaca fascicularis</i>), Cekakak belukar (<i>Halcyon smyrnensis</i>), Cekakak sungai (<i>Todirhamphus chloris</i>), Monyet ekor panjang (<i>Macaca fascicularis</i>). Specific monitoring for elephant was done through patrol on areas where indicated as elephant range/path. The patrol carried out on daily basis and reported under "Laporan Monitoring Serangan Gajah". Based on report review, in 2020 & 2021, there was no elephant attack.</p>	
7.12.8	<p>(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedures (RaCP) applies.</p>	<p>There is no new planting after November 2005. PT Rigunas Agri Utama Bungo Tebo has been planted since 1994, 1995 and 1996. Even though from the planting year, there was planting year 2008. Based on document verification, field visit and interview with stakeholders, it was known that the 512 Ha planted in 2008 was replanting oil palm. The replanting occurred due to low SPH (Stand per Hectare) caused by elephant attack, during early stage of planting. Replanting has been performed by Bungo Tebo Estate since 2016 and finished in 2019. Total replanting in 2016 was 295 ha, in 2017 was 449 ha, in 2018 was 447 ha and 2019 was 787 ha. This indicator is not applicable since there is no new planting after 2005 in PT Rigunas Agri Utama – Bungo Tebo Estate and Scheme Smallholder</p>	<p>Not Applicable</p>

Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2020** for **PT Rigunas Agri Utama – Bungo Tebo Palm Oil Mill** and supply base was calculated using the PalmGHG Calculator version 4. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in **2020** for **PT Rigunas Agri Utama – Bungo Tebo Palm Oil Mill** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	0.88
PKO	0.88

Extraction	%
OER	19.93
KER	5.36

Production	t/yr
FFB Process	211,167
CPO Produced	42,090
PKO Produced	11,324

Land Use	Ha
OP Planted Area	8,433.38
OP Planted on peat	0.00
Conservation (forested)	0.00
Conservation (non-forested)	37.00
Total	8,579.64

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	24,882.98	0.73	0.00	0.00	0.00	0.00	24,882.98	0.73
CO ₂ Emission from fertilizer	1,863.05	0.05	4,564.32	0.05	0.00	0.00	6,427.37	0.05
NO ₂ Emission	1,543.50	0.05	4,109.46	0.04	0.00	0.00	5,652.96	0.05
Fuel Consumption	488.75	0.01	1,752.40	0.02	0.00	0.00	2,241.15	0.02
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sink								
Crop Sequestration	-23,585.76	-0.69	0.00	0.00	0.00	0.00	-23,585.76	-0.69
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	5,192.52	0.15	10,246.18	0.11	11,811.15	0.00	27,429.85	0.13

**Note: Includes both estates and smallholders*

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Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	40,163.51	0.19
Fuel Consumption	475.23	0.00
Grid Electricity Utilization	0.00	0.00
Credit		
Export of Grid Electricity	-0.23	0.00
Sales of PKS	-21,104.60	-0.10
Sales of EFB	0.00	0.00
Total	19,533.91	0.09

Summary of Kernel Crusher Emission and Credit (if applicable)

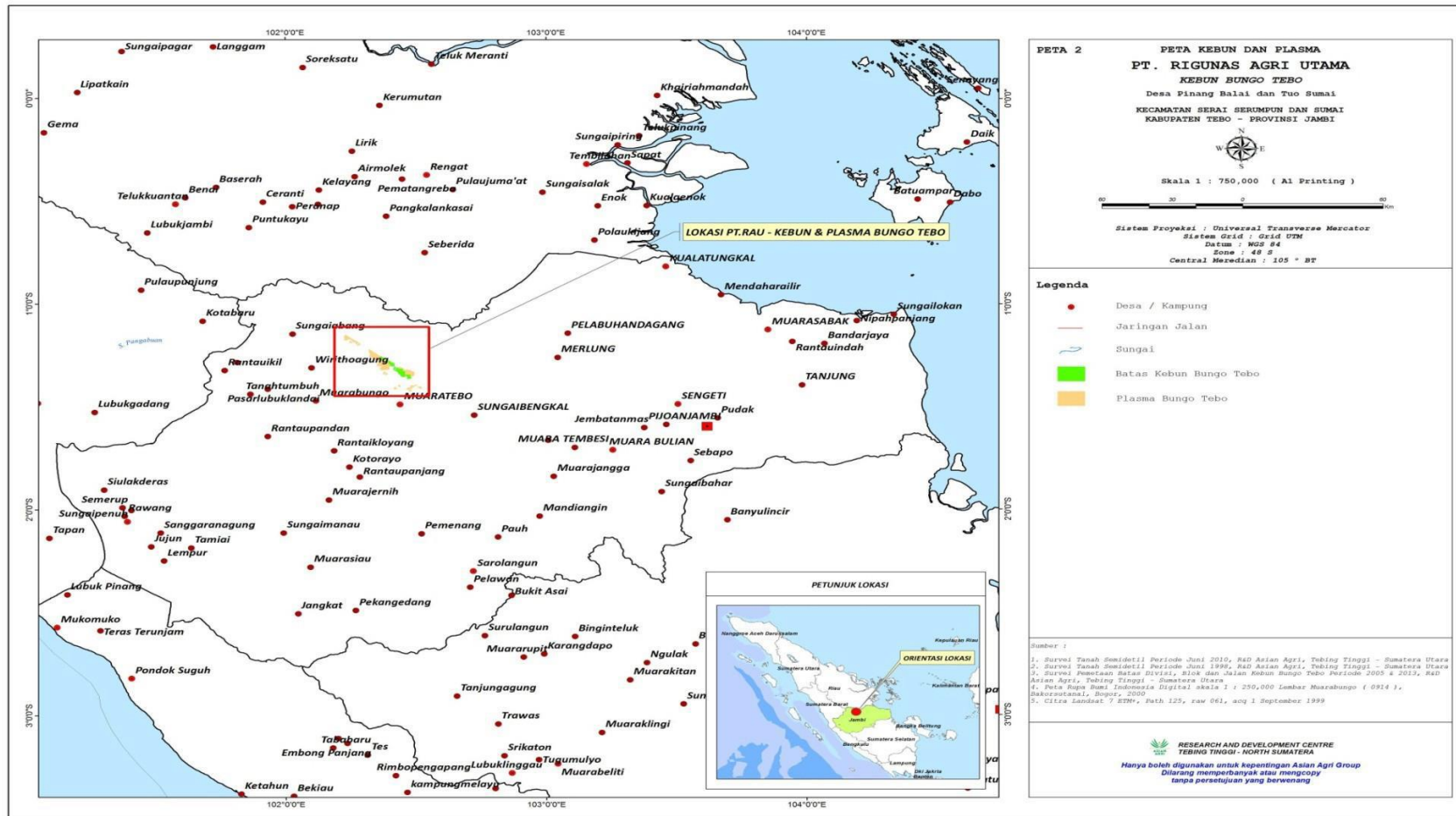
Emissions	tCO ₂ e
PK from own mill	10,043.66
PK from other source	0.00
Fuel Consumptions	0.00
Total Crusher emissions	10,043.66

*This mill has no kernel crusher operation.

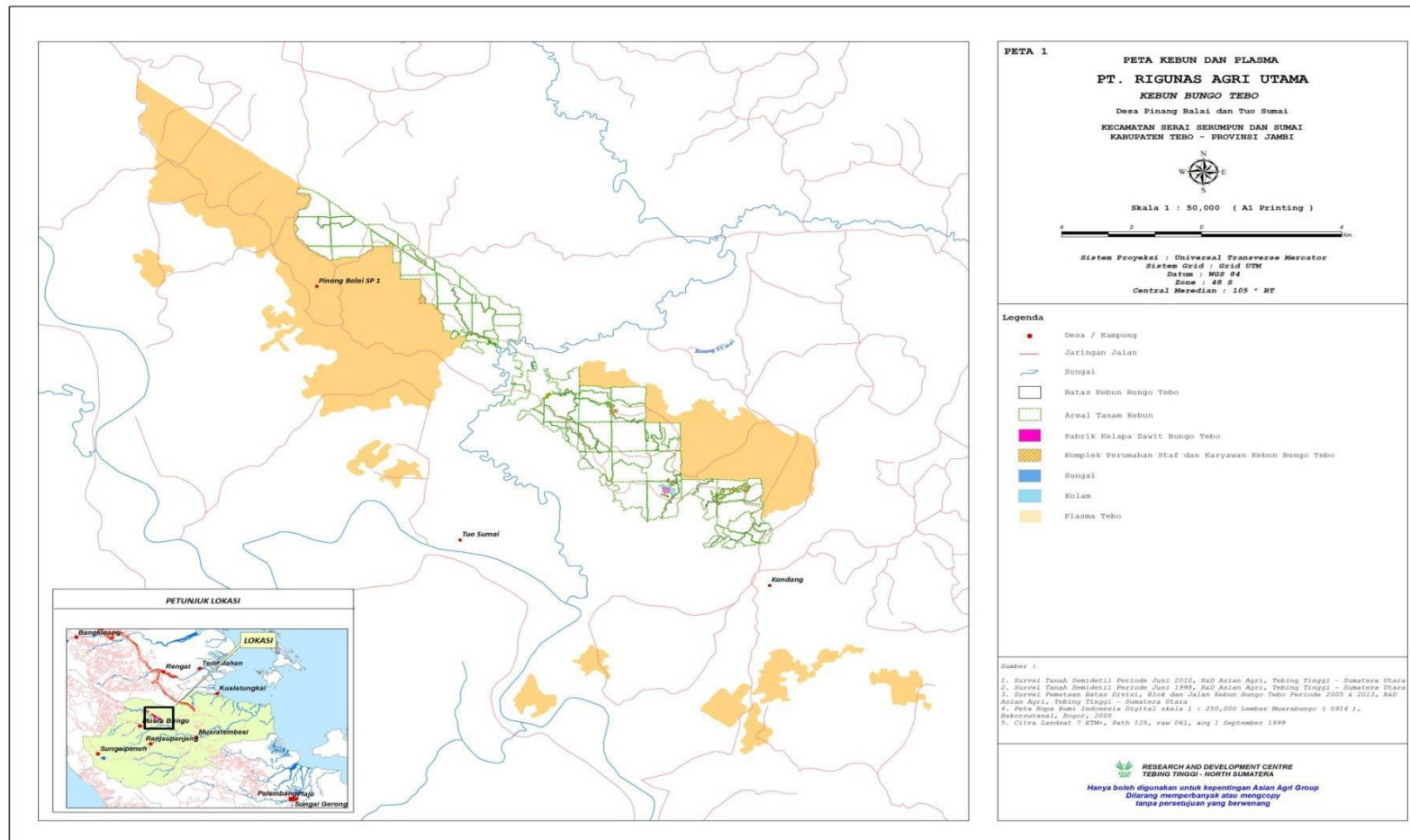
Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	0
Divert to anaerobic diversion (%)	100

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

Appendix C: Location Map of Certification Unit and Supply bases



Appendix D: Estate Field Map



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Appendix E: List of Smallholder Sampled

No	Name of farmer	Location	GPS Reference		Area Summary (Ha)		Forecasted annual FFB Production (MT)	Date of joining	Smallholder ID
			Latitude (S)	Longitude (E)	Total Certified Area	Planted Area			
Koperasi Tanjung Dani Sakti									
1	Sulistiono	Desa Sungai Rambai	01° 17' 53.00"	102° 24' 02.80"	2	2	31.79	1994	599
2	Muksin	Desa Sungai Rambai	01° 17' 53.00"	102° 24' 02.80"	2	2	31.79	1994	602
3	A. Rahman	Desa Sungai Rambai	01° 17' 53.00"	102° 24' 02.80"	2	2	31.79	1994	607
4	Usman Jubai	Desa Sungai Rambai	01° 17' 53.00"	102° 24' 02.80"	2	2	31.79	1994	642
5	Anuar S.	Desa Sungai Rambai	01° 18' 50.60"	102° 23' 41.40"	2	2	34.44	1994	672
6	Mujiono	Desa Sungai Rambai	01° 18' 50.60"	102° 23' 41.40"	2	2	34.44	1994	663
7	M. Isa Ismail	Desa Sungai Rambai	01° 17' 53.00"	102° 24' 02.80"	2	2	31.79	1994	615
8	Robertson Girsang	Desa Sungai Rambai	01° 18' 20.70"	102° 23' 47.50"	2	2	27.86	1994	648
9	Sabungan SRB	Desa Sungai Rambai	01° 18' 20.70"	102° 23' 47.50"	2	2	27.86	1994	649
10	Sawal Pasaribu	Desa Sungai Rambai	01° 18' 20.70"	102° 23' 47.50"	2	2	27.86	1994	675
11	Nasrun	Desa Sungai Rambai	01° 18' 02.70'	102° 23' 39.80"	2	2	37.78	1994	534
12	Darman	Desa Sungai Rambai	01° 18' 02.70'	102° 23' 39.80"	2	2	37.78	1994	535
13	Pahri Lela	Desa Sungai Rambai	01° 18' 02.70'	102° 23' 39.80"	2	2	37.78	1994	539
14	Sangkit	Desa Sungai Rambai	01° 18' 02.70'	102° 23' 39.80"	2	2	37.78	1994	543
15	Fauzi	Desa Sungai Rambai	01° 18' 02.70'	102° 23' 39.80"	2	2	37.78	1994	551
Koperasi Sumay Jaya									
1	Irwan	Desa Tuo Sumay	01° 20' 35.30"	102° 29' 12.71"	2	2	36.21	1994	2101
2	Hasan B.	Desa Tuo Sumay	01° 20' 35.30"	102° 29' 12.71"	2	2	36.21	1994	2124
3	Femi	Desa Tuo Sumay	01° 20' 37.45"	102° 28' 29.18"	2	2	37.93	1994	2230
4	Riswan Sinaga	Desa Tuo Sumay	01° 20' 37.45"	102° 28' 29.18"	2	2	37.93	1994	2232
5	Andrial	Desa Tuo Sumay	01° 20' 37.45"	102° 28' 29.18"	2	2	37.93	1994	2172
6	Zarkisman	Desa Tuo Sumay	01° 20' 37.45"	102° 28' 29.18"	2	2	37.93	1994	2227
7	Kasmir	Desa Tuo Sumay	01° 20' 37.45"	102° 28' 29.18"	2	2	37.93	1994	2174
8	Zainal Siti	Desa Tuo Sumay	01° 20' 37.45"	102° 28' 29.18"	2	2	37.93	1994	2185
9	Iwin	Desa Tuo Sumay	01° 20' 37.45"	102° 28' 29.18"	2	2	37.93	1994	2196
Koperasi Sawit Sumay Makmur									
1	Hasyim S.	Desa Napal Putih	01° 18' 67.70"	102° 22' 82.50"	2	2	40.00	1994	249
2	Maryono	Desa Napal Putih	01° 18' 67.70"	102° 22' 82.50"	2	2	40.00	1994	250
3	Karno	Desa Napal Putih	01° 18' 67.70"	102° 22' 82.50"	2	2	40.00	1994	251
4	Jaka Sriyono	Desa Napal Putih	01° 18' 67.70"	102° 22' 82.50"	2	2	40.00	1994	252
5	Sarji	Desa Napal Putih	01° 18' 78.60"	102° 22' 15.00"	2	2	43.33	1994	219
6	Mulyono	Desa Napal Putih	01° 18' 78.60"	102° 22' 15.00"	2	2	43.33	1994	220
7	Agustian	Desa Napal Putih	01° 18' 78.60"	102° 22' 15.00"	2	2	43.33	1994	228
8	Darmono/Sinaga	Desa Napal Putih	01° 18' 78.60"	102° 22' 15.00"	2	2	43.33	1994	229
9	Siswanto	Desa Napal Putih	01° 18' 78.60"	102° 22' 15.00"	2	2	43.33	1994	230
10	Ruslan	Desa Napal Putih	01° 18' 25.70"	102° 23' 13.60"	2	2	43.64	1994	420

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No	Name of farmer	Location	GPS Reference		Area Summary (Ha)		Forecasted annual FFB Production (MT)	Date of joining	Smallholder ID
			Latitude (S)	Longitude (E)	Total Certified Area	Planted Area			
11	Yitno Al Sirno	Desa Napal Putih	01° 18' 25.70"	102° 23' 13.60"	2	2	43.64	1994	421
12	Misdja	Desa Napal Putih	01° 18' 25.70"	102° 23' 13.60"	2	2	43.64	1994	425
13	Sumanto	Desa Napal Putih	01° 18' 25.70"	102° 23' 13.60"	2	2	43.64	1994	426
14	Jonsnato T.	Desa Napal Putih	01° 18' 25.70"	102° 23' 13.60"	2	2	43.64	1994	427
15	Waridi	Desa Napal Putih	01° 18' 03.40"	102° 22' 50.80"	2	2	40.00	1994	215
16	Abdullah	Desa Napal Putih	01° 16' 90.90"	102° 23' 25.60"	2	2	40.63	1994	512
17	Haris	Desa Napal Putih	01° 18' 03.40"	102° 22' 50.80"	2	2	40.00	1994	216
18	Sahari	Desa Napal Putih	01° 18' 03.40"	102° 22' 50.80"	2	2	40.00	1994	210
19	Kandaryanto	Desa Napal Putih	01° 18' 03.40"	102° 22' 50.80"	2	2	40.00	1994	211
20	Sukrisno	Desa Napal Putih	01° 18' 02.60"	102° 22' 35.90"	2	2	40.00	1994	182
21	Haris/Sukriyanto	Desa Napal Putih	01° 18' 03.40"	102° 22' 50.80"	2	2	40.00	1994	209
22	Waridi/Jurianto	Desa Napal Putih	01° 18' 03.40"	102° 22' 50.80"	2	2	40.00	1994	430
23	Muyono/Solikan	Desa Napal Putih	01° 18' 03.40"	102° 22' 50.80"	2	2	40.00	1994	424
24	Sunaryo/Margono	Desa Napal Putih	01° 18' 03.40"	102° 22' 50.80"	2	2	40.00	1994	188
25	Muhadi/Mujib	Desa Napal Putih	01° 18' 02.60"	102° 22' 35.90"	2	2	40.00	1994	181
Koperasi Belarik Jaya									
1	Asni/Simamora	Desa Tuo Sumay	1° 20' 19.70"	102° 28' 05.40"	2	2	40.48	1994	2246
2	Suparmin/Aulit	Desa Tuo Sumay	1° 20' 19.70"	102° 28' 05.40"	2	2	40.48	1994	2262
3	Heri Aprizal	Desa Tuo Sumay	1° 20' 19.70"	102° 28' 05.40"	2	2	40.48	1994	2263
4	Ridwan	Desa Tuo Sumay	1° 20' 19.70"	102° 28' 05.40"	2	2	40.48	1994	2264
5	Edi Misel/M. Amin	Desa Tuo Sumay	1° 20' 19.70"	102° 28' 05.40"	2	2	40.48	1994	2265
6	Abu Bakar/J. Tumorang	Desa Tuo Sumay	1° 20' 19.70"	102° 28' 05.40"	2	2	40.48	1994	2281
7	Abdullah	Desa Kandang	01° 24' 47.10"	102° 28' 43.90"	2	2	41.18	1994	2320
8	Zainab	Desa Kandang	01° 24' 47.10"	102° 28' 43.90"	2	2	41.18	1994	2321
9	Pak Jamu/Sembiring	Desa Kandang	01° 24' 47.10"	102° 28' 43.90"	2	2	41.18	1994	2323
Koperasi Sumber Usaha									
1	Halil. T/Padla	Desa Tuo Sumay	01° 19' 36.30"	102° 27' 55.90"	2	2	38.89	1996	3320
2	Ridwan/Andal	Desa Tuo Sumay	01° 19' 36.30"	102° 27' 55.90"	2	2	38.89	1996	3321
3	Darasid Mariam/Suhendra	Desa Tuo Sumay	01° 19' 36.30"	102° 27' 55.90"	2	2	38.89	1996	3334
4	Bawi/Pardi	Desa Tuo Sumay	01° 19' 36.30"	102° 27' 55.90"	2	2	38.89	1996	3335
5	Zen	Desa Tuo Sumay	01° 19' 36.30"	102° 27' 55.90"	2	2	38.89	1996	3338
6	Saari Lima	Desa Tuo Sumay	01° 19' 36.30"	102° 27' 55.90"	2	2	38.89	1996	3339
7	Darani Jiah	Desa Tuo Sumay	01° 19' 36.30"	102° 27' 55.90"	2	2	38.89	1996	3340
8	Jupri Hs	Desa Tuo Sumay	01° 19' 36.30"	102° 27' 55.90"	2	2	38.89	2000	3322
9	Sulaiman	Desa Tuo Sumay	01° 19' 36.30"	102° 27' 55.90"	2	2	38.89	2000	3323
10	Mat Sakini	Desa Tuo Sumay	01° 19' 36.30"	102° 27' 55.90"	2	2	38.89	2000	3324
Koperasi Sawit Tambara Jaya									
1	P. Amir/Budi	Desa Tuo Sumay	01° 20' 19.71"	102° 28' 31.71"	2	2	37.50	1996	2201

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No	Name of farmer	Location	GPS Reference		Area Summary (Ha)		Forecasted annual FFB Production (MT)	Date of joining	Smallholder ID
			Latitude (S)	Longitude (E)	Total Certified Area	Planted Area			
2	P. Amir/Untung	Desa Tuo Sumay	01° 20' 19.71"	102° 28' 31.71"	2	2	37.50	1996	2202
3	Hardi/Sapriadi	Desa Tuo Sumay	01° 20' 19.71"	102° 28' 31.71"	2	2	37.50	1996	2205
4	Hardi/Pemi	Desa Tuo Sumay	01° 20' 19.71"	102° 28' 31.71"	2	2	37.50	1996	2213
5	Irwan/Riduan	Desa Tuo Sumay	01° 20' 19.71"	102° 28' 31.71"	2	2	37.50	1996	2219
6	Hutagalung/Toni	Desa Tuo Sumay	01° 20' 19.71"	102° 28' 31.71"	2	2	37.50	1996	2220
7	Irwan/M. Amin	Desa Tuo Sumay	01° 20' 07.99"	102° 28' 28.96"	2	2	42.19	1996	2136
8	Rudi/Inal	Desa Tuo Sumay	01° 20' 07.99"	102° 28' 28.96"	2	2	42.19	1996	2137
9	Halimi/Sahori	Desa Tuo Sumay	01° 20' 07.99"	102° 28' 28.96"	2	2	42.19	1996	2272
10	Gaprudin/Lokman	Desa Tuo Sumay	01° 20' 07.99"	102° 28' 28.96"	2	2	42.19	1996	2180
Koperasi Sawit Makmur									
1	Mustole	Desa Sekutur Jaya	01° 15' 01.70"	102° 20' 08.50"	2	2	40.00	1995	5
2	Sawi/Hadi Winata	Desa Sekutur Jaya	01° 15' 01.70"	102° 20' 08.50"	2	2	40.00	1995	9
3	Sabki/Edi	Desa Sekutur Jaya	01° 15' 01.70"	102° 20' 08.50"	2	2	40.00	1995	1
4	Sawiji	Desa Sekutur Jaya	01° 15' 01.70"	102° 20' 08.50"	2	2	40.00	1995	2
5	Mahili/Heru	Desa Sekutur Jaya	01° 15' 01.70"	102° 20' 08.50"	2	2	40.00	1995	8
6	Ngadri	Desa Sekutur Jaya	01° 15' 01.70"	102° 20' 08.50"	2	2	40.00	1995	719
7	Abdul Rahman	Desa Sekutur Jaya	01° 15' 01.70"	102° 20' 08.50"	2	2	40.00	1995	837
8	Sahroni	Desa Sekutur Jaya	01° 15' 47.09"	102° 20' 40.07"	2	2	39.20	1995	728
9	Abd.Hakim/Doyok	Desa Sekutur Jaya	01° 15' 47.09"	102° 20' 40.07"	2	2	39.20	1995	761
10	Arip/Kasiman	Desa Sekutur Jaya	01° 15' 47.09"	102° 20' 40.07"	2	2	39.20	1995	762
11	Kuswanto/Heriadi	Desa Sekutur Jaya	01° 15' 47.09"	102° 20' 40.07"	2	2	39.20	1995	721
12	Saipul	Desa Sekutur Jaya	01° 15' 47.09"	102° 20' 40.07"	2	2	39.20	1995	25
13	Wahid	Desa Sekutur Jaya	01° 15' 47.09"	102° 20' 40.07"	2	2	39.20	1995	724
14	Rasit	Desa Sekutur Jaya	01° 15' 47.09"	102° 20' 40.07"	2	2	39.20	1995	758
15	Zulkifli	Desa Sekutur Jaya	01° 15' 47.09"	102° 20' 40.07"	2	2	39.20	1995	29
16	Sodikin	Desa Sekutur Jaya	01° 15' 29.46"	102° 20' 40.07"	2	2	40.80	1995	17
17	Heru	Desa Sekutur Jaya	01° 15' 16.70"	102° 21' 21.05"	2	2	40.00	1995	803
18	Sukarno/Len Juarti	Desa Sekutur Jaya	01° 15' 36.69"	102° 20' 40.07"	2	2	39.20	1995	713
19	Jamadil	Desa Sekutur Jaya	01° 15' 49.70"	102° 21' 22.40"	2	2	39.60	1995	754
10	Kabul B.	Desa Sekutur Jaya	01° 15' 49.70"	102° 21' 22.40"	2	2	39.60	1995	775
Total					N/A	N/A	N/A		

Note: above are smallholders sampled in this audit.

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
DPRD	Dewan Perwakilan Rakyat Daerah
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
KKPA	Kredit Koperasi Primer Untuk Anggota
KUD	Koperasi Unit Desa
LD50	Lethal Dose for 50 sample
MB	Mass Balance
MSDS	Material Safety Data Sheet
MT	Metric Tonnes
OER	Oil Extraction Rate
OSH	Occupational Safety and Health
PK	Palm Kernel
PKO	Palm Kernel Oil
POM	Palm Oil Mill
POME	Palm Oil Mill Effluent
PPE	Personal Protective Equipment
PT RAU	PT Rigunas Agri Utama
RSPO	Roundtable on Sustainable Palm Oil
P&C	Principles & Criteria
RTE	Rare, Threatened or Endangered species
SCCS	Supply Chain Certification Standard
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure