

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

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

Client Company name (Parent Company): PT Inti Indosawit Subur
Client company Address: Jl. MH. Thamrin No 31 Jakarta 10230, Indonesia
Certification Unit: PT Inti Indosawit Subur – Buatan I Palm Oil Mill
Location of Certification Unit: Delik/Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan, Regency, Riau Province, Indonesia
Date of Final Report: 15/01/2023

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Section 1: Scope of the Assessment

1. Company Details			
Parent Company	PT. Inti Indosawit Subur		
RSPO Membership Number	1-0022-06-000-00	Membership Approval Date	06/02/2006
Address	Jl. MH. Thamrin No 31 Jakarta 10230, Indonesia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	PT Inti Indosawit Subur – Buatan I Palm Oil Mill		
Location / Address	Delik/Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau Province, Indonesia		
Website	www.asianagri.com		
Management Representative	Mr. Putu Ghrayte Yonata Aksa	E-mail	Putu_Aksa@asianagri.com
Telephone	+62 21 2301119	Facsimile	+62 21 2301120

2. Certification Information			
Certificate Number	RSPO 638918	Certificate Start Date	24/08/2021
Date of First Certification	16/09/2010	Certificate Expiry Date	23/08/2026
Scope of Certification	Production of Palm Oil and Palm Kernel		
Visit Objectives	<ul style="list-style-type: none"> • Determination of the conformity and consistency implementation of Buatan I Palm Oil Mill and its supply bases against Indonesia National Interpretation 2020 for RSPO P&C 2018 for the Production of Sustainable Palm Oil. • Evaluation of the ability of the management system to ensure Buatan I Palm Oil Mill and its supply bases meets applicable statutory, regulatory and contractual requirements. 		
Assessment Cycle	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 2_1) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input type="checkbox"/> Choose an item. <input checked="" type="checkbox"/> Indonesia National Interpretation 2020 for RSPO P&C 2018 for the Production of Sustainable Palm Oil		
Supply Chain Module	<input type="checkbox"/> Identity Preserved; <input checked="" type="checkbox"/> Mass Balance	Mill Capacity	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		

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
ID05/65250	ISO 14001:2015	SGS	10/06/2023
EU-ISCC-Cert-DE100-02045122	ISCC EU	SGS	02/02/2023
SGS-ID-ISPO-0032	ISPO	SGS	20/03/2024

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Buatan I Palm Oil Mill	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau	00° 26' 04.00" N	101° 49' 30.00" E
Buatan Estate	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau	00° 30' 37.00" N	101° 49' 06.00" E
KUD Bhakti Mandiri	Bukit Harapan Village, Kerinci Kanan District, Siak Regency, Riau	00° 29' 16.00" N	101° 47' 47.20" E
KUD Jaya Makmur	Kumbara Utama Village, Kerinci Kanan District, Siak Regency, Riau	00° 29' 56.80" N	101° 47' 31.40" E
KUD Sumber Rejeki	Bukit Agung Village, Kerinci Kanan District, Siak Regency, Riau	00° 25' 50.30" N	101° 48' 49.60" E
KUD Sejahtera	Makmur Village, Kerinci Kanan District, Siak Regency, Riau	00° 25' 28.90" N	101° 50' 07.50" E

5. Description of Supply Base					
New Planting Development		<input checked="" type="checkbox"/> No (no change in total planted area)		<input type="checkbox"/> Yes (please refer to Principle 7 for details)	
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Buatan Estate	2,377	27.78	217.22	2,622	90.66
KUD Bhakti Mandiri (278 members)	980	0	0	980	100
KUD Jaya Makmur (259 members)	920	0	0	920	100
KUD Sumber Rejeki (265 members)	820	0	0	820	100
KUD Sejahtera (295 members)	878	0	0	878	100
Total	5,975	27.78	217.22	6,220	97.41

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6. Plantings & Cycle						
Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Buatan Estate	541	1380	0	456	1,836	541
KUD Bhakti Mandiri	980	0	0	0	0	980
KUD Jaya Makmur	920	0	0	0	0	920
KUD Sumber Rejeki	506	0	0	314	314	506
KUD Sejahtera	386	0	0	492	492	386
Total (ha)	3,333	1,380	0	1,262	2,642	3,333
Note:						

7. Summary of Certified Tonnage of FFB (Own Certified Scope)				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Sept 21 – Aug 22)	Actual (Mar 21 – May 22)		Forecast (Sept 21 – Aug 22)
		Previous license period (Mar 21 – Aug 21)	Current license period (Sept 21 – May 22)	
Buatan Estate	18,144	3,611.57	0	0
KUD Bhakti Mandiri	26,805	4,722.96	11,348.56	11,905
KUD Jaya Makmur	22,368	5,351.73	12,393.52	13,710
KUD Sumber Rejeki	19,772	5,483.91	12,052.92	13,028
KUD Sejahtera	19,339	6,116.21	14,916.72	17,039
Total	106,428	75,998.18		55,682
Note:				
There was zero forecast for Buatan Estate. PT Inti Indosawit Subur – Buatan Group has prepared the program to observe yield trends (OER of CPO) from own estate to processed at their mill especially for Buatan II POM, that during this period:				
<ul style="list-style-type: none"> All FFB from Buatan Estate will be processed at Buatan II POM. Buatan I POM will process FFB from third parties' sources, Buatan I POM did not received FFB form own Estate (Buatan Estate) 				

8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Sept 21 – Aug 22)	Actual (Mar 21 – May 22)		Forecast (Sept 21 – Aug 22)
		Previous license period (Mar 21 – Aug 21)	Previous license period (March 21 – Aug 21)	
-		-	-	
Total		N/A		

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Note:

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

Out growers / smallholders	Tonnage (MT) / year			Forecast (Sept 21 – Aug 22)
	Estimated last year (Sept 21 – Aug 22)	Actual (Mar 21 – May 22)		
		Previous license period (Mar 21 – Aug 21)	Previous license period (Mar 21 – Aug 21)	
3 rd Party	214,811	62,716.29	126,747.19	235,000
Total	214,811	189,463.48		235,000

Note:

9A. Monthly Records of Certified and Uncertified FFB Received since the last audit

No.	Month - Year	Volume of FFB from certified supply base (mt)	Volume of FFB from uncertified supply base (mt)	Total FFB/Month (mt)
1	Mar-21	4,611.41	9,143.21	13,754.62
2	Apr-21	5,367.13	14,712.37	20,079.50
3	May-21	5,843.76	15,163.76	21,007.52
4	Jun-21	5,425.79	12,589.15	18,014.94
5	Jul-21	5,062.12	15,511.00	20,573.12
6	Aug-21	5,305.17	15,106.47	20,411.64
7	Sep-21	4,736.05	9,641.92	14,377.97
8	Oct-21	4,288.20	15,209.25	19,497.45
9	Nov-21	4,799.84	11,920.10	16,719.94
10	Dec-21	5,500.86	9,488.54	14,989.40
11	Jan-22	4,535.75	10,422.01	14,957.76
12	Feb-22	4,418.41	9,938.16	14,356.57
13	Mar-22	4,751.69	9,055.19	13,806.88
14	Apr-22	5,709.84	15,782.91	21,492.75
15	May-22	5,642.16	15,779.44	21,421.60
TOTAL		75,998.18	189,463.48	265,461.66

Note:

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10. Summary of Certified Tonnage (MT) (not applicable for ISS)			
Estimated last year (Sept 21 – Aug 22)	Actual (Mar 21 – May 22)		Forecast (Sept 21 – Aug 22)
	Previous license period (Mar 21 – Aug 21)	Previous license period (Mar 21 – Aug 21)	
FFB	FFB		FFB
106,428 mt	25,286.38 mt	50,711.72 mt	55,682 mt
	TOTAL	75,998.10 mt	
CPO (OER: 19.06 %)	CPO (OER: 19.18 %)		CPO (OER: %)
20,284 mt	4,849.93 mt	9,726.51 mt	10,022 mt
	TOTAL	14,576.44 mt	
PK (KER: 5.35 %)	PK (KER: 5.34 %)		PK (KER: %)
5,694 mt	1,350.29 mt	2,708.04 mt	2,848 mt
	TOTAL	4,058.33 mt	
Note:			

10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	Mar-21	884.47	246.25
2	Apr-21	1,029.41	286.61
3	May-21	1,120.83	312.06
4	Jun-21	1,040.67	289.74
5	Jul-21	970.91	270.32
6	Aug-21	1,017.53	283.30
7	Sep-21	908.37	252.91
8	Oct-21	822.48	228.99
9	Nov-21	920.61	256.31
10	Dec-21	1,055.06	293.75
11	Jan-22	869.96	242.21
12	Feb-22	847.45	235.94
13	Mar-22	911.37	253.74
14	Apr-22	1,095.15	304.91
15	May-22	1,082.17	301.29
TOTAL		14,576.44	4,058.33

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Note:

11. Summary of Actual Volume sold

Current License period (Sept 21 – May 22)

	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	0	5,411.82	0	0	5,411.82
PK (MT)	1,088	0	0	0	1,088
Credits	0	0	0	0	0

Previous License period (Mar 21 – Aug 21)

CPO (MT)	0	4,721	0	0	4,721
PK (MT)	1,518	0	0	0	1,518
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 Inti Indosawit Subur – Buatan I KCP	-	0	2,606
TOTAL			0	2,606

Note:

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

No.	Buyers Name	Scheme Name	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	PT Sari Dumai Sejati	ICSS	10,132.82	0
TOTAL			10,132.82	0

Note:

11C. Records of CPO & PK Sold as conventional since the last audit (if any)

No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)
-	-	-	-
TOTAL		-	-

Note:

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

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

12A. Monthly Records of Certified CPO, PK & PKE (equivalent) produced since the last audit						
No.	Month - Year	FFB (MT)	Certified CPO (MT)	Certified PK (MT)	Certified PKO (MT)	Certified PKE (MT)
-	-	-	-	-	-	-
TOTAL		-	-	-	-	-
Note: 1 mt = 1 credit						

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

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

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn. Bhd. (ASI Accreditation Number: ASI-ACC-067)
Suite 29.01 Level 29, The Gardens North Tower,
Mid Valley City, Lingkaran Syed Putra,
59200 Kuala Lumpur, Malaysia.
Tel +60 (3) 9212 9638 Fax +60 (3) 9212 9639
Representative: Chaiyaporn Seekao (Chaiyaporn.Seekao@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 06/06/2022 – 11/06/2022 The audit programme is included as Section 2.3.

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

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

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

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

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

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

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

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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 (Re-Certification)	Year 2 (ASA 2_1)	Year 3 (ASA 2_2)	Year 4 (ASA 2_3)	Year 5 (ASA 2_4)
Buatan Estate	X	X	X	X	X
KUD Bhakti Mandiri	X	X	X	X	X
KUD Jaya Makmur	X	X	X	X	X
KUD Sumber Rejeki	X	X	X	X	X
KUD Sejahtera	X	X	X	X	X

Tentative Date of Next Visit: May 1, 2023 - May 13, 2023

Total Number of Mandays: 24

2.2 BSI Assessment Team

Name	Role	Competency
Imam Fakhrurozi (IF)	Team Leader	<p>Education: Holds a Degree in Agriculture Technology from Gadjah Mada University.</p> <p>Work Experience: He has 2 years working experience in oil palm plantation as a sustainability and HSE officer and agronomy staff and has more than 7 years of RSPO and sustainable palm oil auditing experience.</p> <p>Training attended: Attended and completed Indonesian Sustainable Palm Oil (ISPO) Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, ISO 14001 Lead Auditor Course, ISO 9001 Lead Auditor Course, OHSAS 18001 Lead Auditor Course, Endorsed RSPO Supply Chain Certification Lead Auditor Course, SMETA requirements training, Introductory Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation Training, and Occupational Safety and Health Expert Training</p> <p>Language proficiency: He is fluent in English and Bahasa Indonesia.</p> <p>Aspect covered in this audit: During this assessment, he assessed on environment, occupational, safety and health aspects.</p>
Nanang Rusmana (NR)	Team Member	<p>Education: Holds a Bachelor Degree of Forestry, Bogor Agricultural University (IPB)</p> <p>Work Experience: 5 years working experience in palm oil industry as SHE Assistant at PT. Astra Agro Lestari Tbk. 3 years working experience in mining industry as Environment Coordinator and SHE Coordinator with PT. Kapuas Prima Coal Group. 6 years working experience as RSPO/ISPO auditor</p>

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		<p>Training attended: Completed ISO 9001:2015 Lead Auditor Course, ISPO Auditor Course, ISO 14001:2015 Lead Auditor Course, ISO 45001:2018 Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, Endorsed RSPO Supply Chain Certification Lead Auditor Course, SMK3 Auditor Course, HCV Assessor Course, General OHS Expert Course, SMETA Requirements training.</p> <p>Language proficiency: He is fluent in English and Bahasa Indonesia.</p> <p>Aspect covered in this audit: : During this audit, he assessed on the aspects of transparency, company policy, and the aspects of HCV management and monitoring</p>
Mujinius Jalaraya	Team Leader	<p>Education: Holds a Bachelor Degree majoring in Forest Resources Conservation and Ecotourism, Bogor Agricultural University (IPB).</p> <p>Work Experience: 6 years working experience in palm oil plantations as SHE Assistant at PT. Astra Agro Lestari Tbk and Sustainability Supervisor at Teladan Prima Group. 8 years working experience as RSPO Auditor / Lead Auditor.</p> <p>Training attended: Completed ISO 9001 Lead Auditor course, ISPO Lead Auditor course, Endorsed RSPO P&C Lead Auditor course, Endorsed RSPO SCCS Lead Auditor course, Introductory Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation, ISO 14001 Internal Auditor Training, ISO 45001 Lead Auditor course, OHS Expert Training, SMETA Requirements Training</p> <p>Language proficiency: He is fluent in English and Bahasa Indonesia.</p> <p>Aspect covered in this audit: During this audit, he assessed on supply chain for mill, partial certification and timebound plan.</p>
Edy Widodo	Team member	<p>Education: Holds a Bachelor Degree majoring Agricultural Technology from University of Padjadjaran, Bandung.</p> <p>Work Experience: 8 years working experience in palm oil industry as Agronomist and Assistant Manager in various companies. 9 year working experience as RSPO/ISPO auditor.</p> <p>Training attended: Completed ISO 9001 Lead Auditor Course, ISPO endorsed auditor course, Understanding ISO 14001 training, Auditing ISO 14001: 2004 training, Endorsed RSPO Supply Chain Certification Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, SMETA Requirements Training, Introductory Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation.</p> <p>Language proficiency: He is fluent in English and Bahasa Indonesia.</p> <p>Aspect covered in this audit: During this assessment, he assessed on social and worker welfare. He also conducted public consultation with related stakeholders.</p>

Accompanying Persons:

Name	Role
-	-

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2.3 Assessment Plan

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

Date	Time	Subjects	MJ	EW	IF	NR
Monday 06/06/2022	07.45 – 09.20	Flight Jakarta – Pekanbaru	√	√	√	√
	09.30 – 11.00	Travel from Pekanbaru to PT Inti Indosawit Subur – Buatan I	√	√	√	√
	12.00 – 14.00	Break	√	√	√	√
	14.00 – 14.30	Opening Meeting Presentation by PT. IIS – Buatan I POM, Estate and Smallholder Presentation by BSI Indonesia	√	√	√	√
	14.30 – 17.00	Document Review Buatan I POM & Estate: - 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. - Operation Procedure, organization commitments, Legal compliance, continuous improvement, long term business plan.	√	√	√	√
Tuesday 07/06/2022	08.00 – 12.00	Field Visit to Buatan 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 ins-ection, worker interviews, social amenities, etc. - Interview with: Labour Union and Gender Committee.	√	√	√	√
	08.00 – 12.00	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 Buatan I POM Field Visit to Buatan I POM: - Inspection of processing, warehouse, workshop, mill wastes management, Effluent Ponds, OHS, Environment issues, POME application, workers interview, Supply chain for CPO mill, Review on SEIA documents and records, Document review, etc.	√	√	√	√

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		- Audit Supply Chain for CPO Mills (RSPO SCCS) - Interview workers.				
Wednesday 08/06/2022	08.00 – 12.00	Field Visit to Scheme Smallholder: KUD Bhakti Mandiri (17 samples) 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. KUD Jaya Makmur (17 samples) Field visit to Kavling/Block member of Smallholder to verify conformity with RSPO INA NI 2020 Standard, BMP, OHS-EMS Implementation, HCV, Social and Labor, Continual improvement, etc.	√	√	√	√
	12.00 – 14.00	Break	√	√	√	√
	14.00 – 17.00	Field Visit to Scheme Smallholder: KUD Sumber Rejeki (17 samples) 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. KUD Sejahtera (17 samples) 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.	√	√	√	√
Thursday 09/06/2022	08.00 – 12.00	Document Review Buatan Estate and Buatan I POM : - 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. - Operation Procedure, organization commitments, Legal compliance, continuous improvement, long term business plan.	√	√	√	√
	12.00 – 14.00	Break	√	√	√	√
	14.00 – 17.00	Document Review Buatan Estate and Buatan I POM : - 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.				
Friday, 10/06/2022	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.	√	√	√	√
	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.	√	√	√	√
Saturday, 11/06/2022	08.00 – 12.00	Document review for Buatan Estate, Buatan I POM and Scheme Smallholder	√	√	√	√
	12.00 – 14.00	Break	√	√	√	√
	14.00 -15.00	Report Preparation	√	√	√	√
	15.00 -17.00	Closing Meeting	√	√	√	√

Section 3: Assessment Findings

3.1 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the plan include all current subsidiaries, estates and mills that is under the control 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 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"> 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. <p>Segati Palm Oil Mill (PT Mitra Unggul Pusaka) located in Pelalawan, Riau planned for Re-Audit in year 2022, re-audit certification has conducted on 29 November – 3 December 2021 by TUV Rheinland. PT Mintra Unggul Pusaka - Penarikan Mill and Supply bases (Penarikan Estate) located in Pelalawan Riau planned for eaudit in year 2022, and re-audit certification has concuted on 29 November – 3 December 2021 by TUV Rheinland.</p>	Complied

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	<p>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.</p> <p>For Bahilang Estate (Supply bases for Tanah Datar Mill) planned in year 2022 due to still in process of RACP (recertification 2020). Teluk Panjie Estate (801ha) as supply bases for Teluk Panjie Mill planned in 2022 due to HGU still in process.</p> <p>3. Sentral Estate (PT Gunung Melayu). RaCP still under Process. Certification audit will be planed 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>Sentral Estate (Supply bases for Gunung Melayu II POM planned in 2022 due to still in process of RACP (recertification 2020).</p> <p>4. Teluk Panji Estate. HGU for this unit has not been obtained and still under process. Certification audit will be planed 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-year 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>Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?</p>	<p>Yes, there is time bound plan revision dated 1 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 planed on 2022 2. Bahilang Estate (PT). RaCP still under Process. Certification audit will be planed on 2022. 3. Sentral Estate (PT Gunung Melayu). RaCP still under Process. Certification audit will be planed on 2022. 4. Teluk Panji Estate. HGU has not been obtained and still under process on government side. Certification audit will be planed on 2022. 	<p>Complied</p>

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<p>Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised</p>	<p>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>		
<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 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.</p> <p>Sentral Estate (PT Gunung Melayu). RaCP still under Process. Certification audit will be planed 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 planed 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 plantationin PT Mitra Unggul Pusaka, cacao plantation in Bahilang Estate and Sentral Estate no primary forest.</p>	<p>Complied</p>

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	<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>Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.</p>	<p>Internal audit has conducted for Penarikan Mill on 20-25 June 2022, Bahilang Estate on 08-09 February 2022, Teluk Panji Estate on 18-23 February 2022 and Sentral Estate on 22-27 August 2022, there is no Labor disputes occur in this management unit. In addition the company has been certified for ISPO (Indonesian Sustainable Palm Oil) since December 2016.</p> <p>According to the RSPO RaCP tracker (https://www.rspo.org/certification/remediation-and-compensation/racp-tracker) update 01 September 2022, PT Inti Indosawit Subur has:</p> <ul style="list-style-type: none"> • MU’s with potential liabilities: 4 units • LUCA Submitted (MUs): 4 units • LUCA review completed (MUs): 4 units • Concept Note required (MUs): 3 units • Concept Note submitted (MUs): 2 units • Concept Note approved (MUs): 0 • Concept Note submitted (MUs): 0 • Concept Note endorsed (MUs): 0 • Remediation Plan required (MUs): 4 units • Remediation Plan submitted (MUs): 0 • Remediation Plan approved (MUs): 0 	<p>Complied</p>
<p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2</p>	<p>Internal audit has conducted for Penarikan Mill on 20-25 June 2022, Bahilang Estate on 08-09 February 2022, Teluk Panji Estate on 18-23 February 2022 and Sentral Estate on 22-27 August 2022, there is no Labor disputes occur in this management unit. In addition the company has been certified for ISPO (Indonesian Sustainable Palm Oil) since December 2016.</p>	<p>Complied</p>
<p>Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1</p>	<p>Internal audit has conducted for Penarikan Mill on 20-25 June 2022, Bahilang Estate on 08-09 February 2022, Teluk Panji Estate on 18-23 February 2022 and Sentral Estate on 22-27 August 2022, there is no Labor disputes occur in this management unit. In addition the company has been certified for ISPO (Indonesian Sustainable Palm Oil) since December 2016.</p>	<p>Complied</p>
<p>Did the company conduct internal audit against the uncertified management units requirement? If yes, a positive assurance statement shall be available.</p>	<p>PT Mitra Unggul Pusaka – Segati Mill conduct the internal audit each year. Internal audit has conducted for Penarikan Mill on 20-25 June 2022, Bahilang Estate on 08-09 February 2022, Teluk Panji Estate on 18-23</p>	<p>Complied</p>

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	<p>February 2022 and Sentral Estate on 22-27 August 2022, there is no Labor disputes occur in this management unit. Report of internal audit are available.</p> <p>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 is available: There is no land conflict occur, no labor disputes occur, no legal non compliance, HCV monitoring and management well implemented.</p> <p>In addition the company has been certified for ISPO (Indonesian Sustainable Palm Oil) since December 2016.</p>	
<p>Have there been any stakeholder (including NGO) consultation conducted?</p>	<p>Internal audit has conducted for Penarikan Mill on 20-25 June 2022, Bahilang Estate on 08-09 February 2022, Teluk Panji Estate on 18-23 February 2022 and Sentral Estate on 22-27 August 2022, there is no Labor disputes occur in this management unit.</p> <p>The stakeholder consultation including NGO cannot be done due to Pandemic Covid-19 circumstances. The stakeholder consultation will be conducted after the normal situation.</p>	<p>Complied</p>

3.2 Progress of scheme smallholders and/or outgrowers

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

Approved Time Bound Plan

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

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Subur	Tungkal Ulu District, Tanjung Jabung Regency, Jambi		District, Tanjung Jabung Regency, Jambi		August 2017
		Tungkal Ulu (Plasma)	Renah Mendalo, Merlung, Muara Papalik District, Tanjung Jabung Barat Regency,	2012	Certified on 15 August 2012 Re-Certification on August 2017
Muara Bulian Mill - PT Inti Indosawit Subur	Singoan / Bukit Sari / Bulian Jaya Village, Muara Bulian / Pemayung District, Batang Hari Regency, Jambi	Muara Bulian Estate	Singoan / Bukit Sari / Bulian Jaya Village, Muara Bulian / Pemayung District, Batang Hari Regency,	2013	Certified on 12 July 2013 Re-Certification on August 2017
		Muara Bulian (Plasma)	Maro Sebo Ilir District, Batanghari Regency, Jambi	2013	Certified on 12 July 2013 Re-Certification on August 2017
Topaz Mill – PT Tunggal Yunus Estate	Petapahan Village, Tapung District, Kampar Regency, Riau	Topaz Estate	Petapahan Village, Tapung District, Kampar Regency, Riau	2015	Certified on 30 March 2015
Taman Raja Mill – PT Dasa Anugrah Sejati	Lubuk Bernai / Kampung Baru / Pelabuhan Dagang / Pematang Pauh Village, Tungkal Ulu District, Tanjung Jabung Regency, Jambi	Taman Raja, Badang & Bernai Estate*	Lubuk Bernai / Kampung Baru / Pelabuhan Dagang / Pematang Pauh Village, Tungkal Ulu District, Tanjung Jabung Regency, Jambi	2015	Certified on 20 February 2015 *Bernai Estate Split From Taman Raja & Badang Estate Since 1 January 2019
Segati Mill – PT Mitra Pusaka Unggul	Langkan / Penarikan / Tambak / Sotol Village, Langgam District, Pelalawan Regency, Riau	Segati Estate	Langkan / Penarikan / Tambak / Sotol Village, Langgam District, Pelalawan Regency, Riau	Re-audit in 2022	Re-Audit Certification on 29 November – 3 December 2021 by TUV Rheinland.
		Gondai Estate	Pangkalan Sarik / Baru Village, Langgam / Siak Hulu District, Pelalawan / Kampar Regency, Riau	Re-audit in 2022	Re-Audit Certification on 29 November – 3 December 2021 by TUV Rheinland.
Penarikan Mill – PT Mitra Unggul Pusaka	Penarikan Village, Langgam District, Pelalawan Regency, Riau	Penarikan Estate*	Penarikan / Tambak Village, Langgam District, Pelalawan Regency, Riau	Re-audit in 2022	Re-Audit Certification on 29 November – 3 December 2021 by TUV Rheinland
Tanah Datar Mill – PT Supra	Tanah Datar Petatal Village, Talawi District,	Tanah Datar Estate	Tanah Datar Petatal Village, Talawi District, Asahan Regency, North	2015	Certified on 18 May 2015

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Matra Abadi	Asahan Regency, North Sumatera		Sumatera		
		Bahilang Estate	Bahilang Village, Tebing Tinggi District, Serdang Bedagai Regency, North Sumatera	2022	*Bahilang Estate On Process RaCP (Recertification 2020)
Aek Nabara Mill – PT Supra Matra Abadi	S1-S3 / Sukadame Village, Bilah Hulu / Kota Pinang District, Labuhan Batu Regency, North Sumatera	Aek Nabara Estate	S1-S3 / Sukadame Village, Bilah Hulu / Kota Pinang District, Labuhan Batu Regency North Sumatera	2015	Certified on 6 March 2015
Teluk Panjie Mill – PT Supra Matra Abadi	Teluk Panjie Village, Kampung Rakyat District, Labuhan Batu Regency, North Sumatera	Teluk Panjie Estate (3,885 Ha)	Teluk Panjie Village, Kampung Rakyat District, Labuhan Batu Regency, North Sumatera	2015	Certified on 21 April 2015
		Teluk Panjie Estate (801 Ha)		2022	HGU still in process
Peranap Mill – PT Rigunas Agri Utama	Simelinyang / Pauh Ranap / Sengkilo Village, Peranap District, Indragiri Hulu Regency, Riau	Peranap Estate	Simelinyang / Pauh Ranap / Sengkilo Village, Peranap District, Indragiri Hulu Regency, Riau	2015	Certified on 7 January 2015
		Peranap (Plasma)		2016	Certified on 18 August 2016
Bungo Tebo Mill – PT Rigunas Utama Agri	Tuo Sumai / Sungai Rambai Village, PWK Sumai / Tebo Ulu District, Bungo Tebo Regency, Jambi	Bungo Tebo Estate	Tuo Sumai / Sungai Rambai Village, PWK Sumai / Tebo Ulu District, Bungo Tebo Regency, Jambi	2015	Certified on 3 December 2015
		Bungo Tebo (Plasma)		2017	Certified on 7 February 2017
Tanjung Selamat Mill – PT Indo Sepadan Jaya	Kampung Padang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatera	Tanjung Selamat	Kampung Padang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatera	2015	Certified on 26 May 2016
		Pangkalan	Sennah Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatera	2015	Certified on 26 May 2016
Gunung Melayu I – PT Saudara Sejati Luhur	Rahuning Bandar District, Village, Pulau Asahan Regency, Sumatera North	Pulau Maria Estate	Rahuning Village, Bandar Pulau District, Asahan Regency, North Sumatera	2015	Certified on 7 September 2015
Gunung Melayu II – PT	Gonting Malaha Village, Bandar Pulau District,	Aek Tarum & Batu Anam Estate	Gonting Malaha Village, Bandar Pulau District, Asahan Regency, North	2015	Certified on 8 July 2015

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Gunung Melayu	Asahan Regency, North Sumatra	Sentral Estate	Sumatra	2022	*Sentral Estate On Process RaCP (Recertification 2020)
Negri Lama II Mill – PT Hari Sawit Jaya	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	Nagri Lama	Nagri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	2016	Certified on 23 December 2016 as Independent mill Audit in 2016 as Mill and Supply Base
		Aek Kuo (2,088 Ha)	Aek Korsik Village, Aek Natas District, Labuhan Batu Regency, North Sumatra	2018	HGU Complete Audit at ASA (2018)
		Aek Kuo (501 Ha)		2018	
Nagri Lama I Mill – PT Hari Sawit Jaya	Nagri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	*3rd party which is excluded from scope of certification	Nagri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	2015	Certified on 8 April 2015 Audit in 2016 as Independent Mill

3.3 Details of Nonconformities

The nonconformities are listed below. The findings summary of the assessment by criteria are listed in Appendix A. During this Assessment there were 0 Critical; 1 (one) Minor nonconformities and 0 Opportunity For Improvement raised. The PT Inti Indosawit Subur – Buatan I 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 #	2213452-202206-N1	Issued Date	11 June 2022
Due Date	ASA 2-1	Closure Date	10 June 2023
Indicator & Category (Critical / Minor)	Indicator 6.7.2		
Statement of Nonconformity:	PT Inti Indosawit Subur – Buatan I POM has defined the procedure for emergency response under Standard Operational Procedure – Environmental Field Procedure, however during site tour there was found inconsistent on implementation.		
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>PT Inti Indosawit Subur – Buatan I POM has defined the procedure for emergency response under Standard Operational Procedure – Environmental Field Procedure, such as:</p> <ul style="list-style-type: none"> Nomor AA-KL-11-EFP tentang Penanganan Tumpahan di Laboratorium Nomor AA-KL-14-EFP tentang Pengendalian Kebakaran Lahan Nomor AA-KL-16-EFP tentang Pengendalian Tumpahan B3 dan Limbah B3 Nomor AA-KL-17-EFP tentang Pengendalian Ledakan Boiler, Tabung Gas dan Lainnya Nomor AA-KL-18-EFP tentang Pengendalian Gempa Bumi, Banjir dan Tanah Longsor Nomor AA-KL-19-EFP tentang Tanggap Darurat Kabut Asap <p>However, during site tour there was found inconsistent on implementation, such as:</p> <ul style="list-style-type: none"> Temporary hazardous waste storage was not provided with secondary containment In Kindergarten / Childcare in Buatan Estate, there found the first aid kit in-completed Fire extinguisher found not function, location in KCP (near Kernel Station in Buatan I POM) Rotary motor (near Boiler Station) is not equipped with safety cover. 		

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	<ul style="list-style-type: none"> Accident and emergency procedures was not clearly understood by assigned operator (Hydrant near Boiler Station)
Corrections:	<ul style="list-style-type: none"> Prepared improvements to the existing oil trap by increasing its size so that it can accommodate a spill of 200 L Filling out the first aid kit Replacing an unused fire extinguisher Repairs on machines that no longer have a lid Conduct emergency response simulation
Root Cause Analysis:	<ul style="list-style-type: none"> There is a change in Personal In Charge due to job rotation/mutation or new hired, and they don't understand the procedure. OHS expert (Ahli K3-umum has not been consistent on monitoring/safety inspection. There are new employees who have not participated in the emergency response simulation
Corrective Actions:	<ul style="list-style-type: none"> Prepared the program to first aid monitoring every time there is use of the contents of the first aid kit, engine cover and OHS issues. Appoint an assistant (PIC) at each station as the person in charge of monitoring the fire extinguisher at each station Prepare an emergency response simulation training schedule for semester II – year 2022
Assessment Conclusion:	<p>PT Inti Indosawit Subur – Buatan I POM has implemented the correction and corrective action as above.</p> <p>The evidence will verified during next surveillance. This Minor NC remain open.</p>

Opportunity for Improvements	
OFI #	Description
OFI 1	N/A

Positive Findings	
PF #	Description
PF 1	N/A

3.3.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	1937165-202007-M1	Issued Date	21 July 2020
Due Date	21 October 2020	Closure Date	20 October 2020
Indicator & Category (Critical / Minor)	RSPO INA-NI 2020 Indicator 3.8.6 Critical		

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Statement of Nonconformity:	Internal audit RSPO SCCS 2020 has been conducted on 2- 5 June 2020 by Internal Auditor, however the internal audit findings were not appropriate and the evidence of follow up action cannot be demonstrated.
Requirement Reference:	Internal Audit i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill; a) Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. b) Effectively implements and maintains the standard requirements within its organisation. ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.
Objective Evidence:	PT. Inti Indosawit Subur – Buatan I POM has a procedure to conduct internal audit RSPO, including RSPO SCCS as per Procedure of Traceability (AA-MPM-OP-1400.17-R7) chapter 6.7. Internal audit conducted twice a year. Latest internal audit has been conducted on 2- 5 June 2020 by Internal Auditor, internal audit report were evident, however the internal audit findings were regarding the shipping announcement of CPKO which is not related to mill instead KCP. In addition there is no evidence of correction and corrective action done to close the issue.
Corrections:	Revision for internal audit report of RSPO SCCS has been made on 28 August 2020. Internal audit findings were adjust to Buatan I Palm Oil Mill and correct the typo error of KCP. Report amendment can be demonstrated during audit. Based on the results of the verification of the internal audit report, it can be shown that the report is appropriate and the checklist used was the latest audit checklist according to RSPO P&C 2018, INA NI 2020. Audit findings, rootcause analysis, correction and corrective action and its evidence can be shown in the report of internal audit.
Root Cause Analysis:	Lack of understanding of the internal auditor team regarding the latest audit checklist used for internal audit of the RSPO SCCS Buatan I POM.
Corrective Actions:	Internal Audit Manager has carried out the refreshment training for internal audit team on 11 September 2020 by online training. Evidence of training can be demonstrated as per Zoom Meeting record dated 11 September 2020. Training material and minutes of training are available and verified. Internal audit department has made the improvement plan to address the internal audit issue and to enhance the internal audit performance. Improvement plan present as per "IMPROVEMENT PLAN INTERNAL AUDIT RSPO SCCS Tahun 2020". Improvement plan are including: Refreshment training plan, Internal audit procedure review, Pilot project of internal audit improvement process, review the external audit as the reference.
Assessment Conclusion:	PT Inti Indosawit Subur – Buatan I POM has implemented the correction and corrective action as above. Auditor has verify all the evidence document to fulfil the internal audit RSPO, including RSPO SCCS as per Procedure. Internal audit

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	<p>department has made the improvement plan to address the internal audit issue and to enhance the internal audit performance.</p> <p>The NC has closed satisfactory on 20 October 2020.</p>
Effectiveness Closure (for previous audit closed Critical NC):	During ASA 2.1 – the NC still remain effectively closed.

Non-conformity			
NCR Ref #	1937165-202007-M2	Issued Date	21 July 2020
Due Date	21 October 2020	Closure Date	20 October 2020
Indicator & Category (Critical / Minor)	RSPO INA-NI 2020 Indicator 3.8.16 Critical		
Statement of Nonconformity:	<p>According to transaction record in Palmtrace confirmed that there were 2 transaction record with shipping announcement in the RSPO IT Platform made more than 3 month after Bill of Lading, i.e:</p> <ul style="list-style-type: none"> • BL date CSPK to Buatan I KCP dated 29/02/2020, volume 59.39 MT, Shipping announcement was made on 09/07/2020 • BL date CSPK to Buatan I KCP dated 31/03/2020, volume 449.66 MT, Shipping announcement was made on 09/07/2020 		
Requirement Reference:	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <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>		
Objective Evidence:	<p>According to transaction record in Palmtrace Buatan I POM confirmed that there were 2 transaction record with shipping announcement in the RSPO IT Platform made more than 3 month after Bill of Lading, i.e:</p> <ul style="list-style-type: none"> • BL date CSPK to Buatan I KCP dated 29/02/2020, volume 59.39 MT, Shipping announcement was made on 09/07/2020 • BL date CSPK to Buatan I KCP dated 31/03/2020, volume 449.66 MT, Shipping announcement was made on 09/07/2020 		
Corrections:	<p>Buatan I POM has made an update and internal coordination regarding the implementation of RSPO SCCS standards for Palm Oil Mill that the shipping announcement must be made a maximum of 3 months after the delivery transaction/BL date is made. Internal coordination between sustainability department, purchasing and palm Oil Mill unit can be demonstrated through email correspondence.</p> <p>Shipping announcements after July 2020 are made maximum of 3 months after the transaction. The following is an example of the shipping announcement that has been made for CSPK:</p>		

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	<ul style="list-style-type: none"> Transaction ID # TR-a1c7c1e9-e39b, Product name: CSPK, Seller: PT Inti Indosawit Subur - Buatan I (RSPO_PO1000000021), Buyer: PT Inti Indosawit Subur - Buatan I KCP (RSPO_PO1000002758), Shipping/BL Date: 31/08/2020, Confirmation Date (Shipping announcement): 21/10/2020, Volume: 219.44 MT. Transaction ID # TR-d22fc925-2e72, Product name: CSPK, Seller: PT Inti Indosawit Subur - Buatan I (RSPO_PO1000000021), Buyer: PT Inti Indosawit Subur - Buatan I KCP (RSPO_PO1000002758), Shipping/BL Date: 31/07/2020, Confirmation Date (Shipping announcement): 21/10/2020, Volume: 393.46 MT. <p>From above shipping announcement can be demonstrated that Shipping announcement are made not more than 3 month after shipping/BL date.</p>
Root Cause Analysis:	PICs that make the shipping announcement do not update regarding the latest RSPO SCCS requirements for Palm Oil Mill that the PKS shipping announcement must be made a maximum of 3 months after dispatch/Bill of Lading date.
Corrective Actions:	<p>Certificate holder has made the form of monitoring indicated the CSPK produce and delivery by Buatan I POM to buyer (KCP or other party). Monitoring of CSPK production and delivery are made each month as a reference for the shipping announcements made by PIC (Jakarta Office). Monitoring form since July 2020 - October 2020 can be demonstrated during audit.</p> <p>Shipping announcements are made based on SOP AA-SM-405.2-R3.</p> <p>From the July - October period it was confirmed that there were no RSPO certified CPO sales and only RSPO certified PK sales.</p>
Assessment Conclusion:	<p>PT Inti Indosawit Subur – Buatan I POM has implemented the correction and corrective action as above.. Auditor has verify all the evidence document to fulfil the Shipping announcements are made based on SOP AA-SM-405.2-R3. Shipping announcements after July 2020 are made maximum of 3 months after the transaction.</p> <p>The NC has closed satisfactory on 20 October 2020.</p>
Effectiveness Closure (for previous audit closed Critical NC):	During ASA 2.1 – the NC still remain effectively closed.

Non-conformity			
NCR Ref #	1937165-202007-M3	Issued Date	21 July 2020
Due Date	21 October 2020	Closure Date	20 October 2020
Indicator & Category (Critical / Minor)	RSPO INA-NI 2020 Indicator 6.6.2 Critical		
Statement of Nonconformity:	PT Inti Indosawit Subur - Buatan I POM employed temporary workers/PHL for their operation, however there is no specific procedures and policies related to temporary workers/PHL (Perjanjian Kerja Waktu Tertentu/PKWT).		
Requirement Reference:	Where temporary (Specified Time Work Agreement/PKWT) or migrant workers are employed, a specific labour policy and procedures are established and evidence of implementation is available.		
Objective Evidence:	PT Inti Indosawit Subur – Buatan I POM uses temporary workers as PHL at Buatan I Estate, Plasma and Buatan I POM operations. Based on employee list period May		

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	<p>2020, there are 268 PHL workers in Buatan I Estate, 3 PHL workers in Plasma Buatan I and 19 PHL workers in Buatan I POM.</p> <p>The company has a procedure regarding SOP No. New Employee Reception AA-HR-305.2-R0 dated 1 February 2009, this procedure is a general acceptance of employees (for all employees), there are no specific procedures and policies regarding BHL or PKWT workers according to the RSPO P&C requirements.</p>
Corrections:	<p>PT Inti Indosawit Subur – Buatan I POM and Estate has issued the specific labour policy and procedures for temporary workers (PHL/PKWT); The policy and procedure are issued for each unit as below:</p> <ul style="list-style-type: none"> • Buatan I POM: Memorandum No. 157/MI-PBS/VIII/2020, dated 11 August 2020. • Buatan Estate: Memorandum No. 391/ES-KBN/MEMO/08/2020, dated 11 August 2020. <p>The policy and procedure has been communicated to workers, especially to temporary workers at Buatan I POM on 22 August 2020, while in Buatan Estate socialization conducted on 15 August 2020 to workers of Afdeling I - III, Traksi and adminsitration. The procedure was explain the detail of mechanism for temporary workers recruitment, promotion of temporary workers to be permanent workers, term and condition and requirement of temporary workers in accordance with National regulation (UU No. 13 tahun 2003).</p>
Root Cause Analysis:	<p>There has been no coordination between the sustainability department and the HR department in adjusting for updates/changes to the implementation of the RSPO INA NI 2020 principles and criteria, including updating procedures for PHL/PKWT.</p>
Corrective Actions:	<p>PT Inti Indosawit Subur - Buatan I POM & Estate will review the policy and procedure including the implementation of procedure periodically in coordination with Human resources Department. Sustainability team has made the coordination with HR department and Estate/Mill department to keep updated the policy and procedure according to relevant regulation.</p>
Assessment Conclusion:	<p>PT Inti Indosawit Subur – Buatan I POM has implemented the correction and corrective action as above. Auditor has verify all the evidence document to fulfil the procedures and policies related to temporary workers/PHL. Company has issued the specific labor policy and procedures for temporary workers (PHL/PKWT) and disseminated to all workers.</p> <p>The NC has closed satisfactory on 20 October 2020.</p>
Effectiveness Closure (for previous audit closed Critical NC):	<p>During ASA 2.1 – the NC still remain effectively closed.</p>

Non-conformity			
NCR Ref #	1937165-202007-M4	Issued Date	21 July 2020
Due Date	21 October 2020	Closure Date	20 October 2020
Indicator & Category (Critical / Minor)	RSPO INA-NI 2020 Indicator 7.10.1 Critical		
Statement of Nonconformity:	Buatan I POM has monitored the emission and pollutants from estate and mill operation using PalmGHG Version 4. However, it was found that information used		

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	for GHG calculation in Buatan I POM using PalmGHG Version 4, was not accurate – compared against the estate and mill operational database.
Requirement Reference:	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.
Objective Evidence:	<p>Audit team was found that the calculation for Buatan I POM, using PalmGHG Version 4 was not accurate – compared against the estate and mill operational database.</p> <p>Example of database seen:</p> <ul style="list-style-type: none"> • From PalmGHG version 4 => the figure for FFB supplied from Buatan Estate was stated 22,280 tons – whereby the planted hectareage of 1,953.33 Ha resulting in yield 11,41 ton FFB/Ha/year. The database (LHP) shown the FFB figure from Buatan Estate (supplying to Buatan I POM) were 19,733.12 tons. • The figure for FFB supplied from 3rd party stated 196,847 tons. The data provided shown the FFB figure from 3rd party (supplying to Buatan I POM) was 199,393.331 tons;
Corrections:	<p>The company has revised the GHG data input by adjusting the actual data reported by Buatan I POM and Estate. GHG Calculation amendment can be demonstrated during audit as per "GHG Summary Report 2020 PT Inti Indosawit Subur - Buatan I POM". Based on verification data of data input GHG compare to actual data reported by Buatan I POM and Estate confirmed that the data input in GHG calculation are met and inline with actual data of Buatan I POM and Estate. Input data verify covering: FFB production (own, group & third party), CPO & PK production, OER, KER, PK Shell production and sales, POME production, EFB p[roduction, Fertilizer usage (own & group plantation), Planted area (own and group), Conservation area, Fossil fuel usage, Grid electricity, etc.</p> <p>According to GHG summary report, GHG summary emission are: 0.26 tCO2 e/t CPO and 0.26 tCO2 e/t PK.</p>
Root Cause Analysis:	Lack of coordination between the Mill and Estate units in terms of providing raw data with the Jakarta Office that performs GHG calculations.
Corrective Actions:	The Jakarta office (JRO) coordinates with Buatan I POM & Estate units in terms of providing raw data for input on GHG calculations. Before calculating, JRO cross-checks and verifies the mill and plantation units documented in the "GHG RSPO Sheet". In this form, it is reconfirmed the suitability of the GHG data input with the actual data from the mill and estate reports. GHG RSPO sheet can be demonstrated during audit verification.
Assessment Conclusion:	<p>PT Inti Indosawit Subur – Buatan I POM has implemented the correction and corrective action as above. Auditor has verify all the evidence document to fulfil the GHG calculations using PalmGHG Version 4. Company has revised the GHG data input by adjusting the actual data reported by Buatan I POM and Estate, the GHG calculation found accurately calculated.</p> <p>The NC has closed satisfactory on 20 October 2020.</p>
Effectiveness Closure (for previous audit closed Critical NC):	During ASA 2.1 – the NC still remain effectively closed.

Opportunity for Improvement	
OFI#	Description
OFI 1	-

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
798070-201906-N1	Minor	RSPO P&C INA-NI 2016 indicator 2.2.2	04/07/2019	Closed 21/07/2020
798070-201906-N2	Minor	RSPO P&C INA-NI 2016 indicator 4.8.2	04/07/2019	Closed 29/07/2020
1937165-202007-M1	Major	RSPO P&C INA-NI 2020 indicator 3.8.6	21/07/2020	Closed 20/10/2020
1937165-202007-M2	Major	RSPO P&C INA-NI 2020 indicator 3.8.16	21/07/2020	Closed 20/10/2020
1937165-202007-M3	Major	RSPO P&C INA-NI 2020 indicator 6.6.2	21/07/2020	Closed 20/10/2020
1937165-202007-M4	Major	RSPO P&C INA-NI 2020 indicator 7.10.1	21/07/2020	Closed 20/10/2020
2213452-202206-N1	Minor	RSPO P&C INA-NI 2020 indicator 6.7.2	11/06/2022	Open

3.4 Stakeholders and previous land owner / user consultation

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

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

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

Stakeholders contacted		
Type of Stakeholder (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	Stakeholder name / organization	Means of communication (e.g. face to face interview, email, phone interview, comment from public notice)
Gender Committee:	Ibu Yusniarty (Chief of Gender Committee in Scheme Smallholder PT Inti Indosawit Subur - Buatan Group)	face to face interview
Head of Villages:	Bpk. Rubiman Zianur (Head of Simpang Perak Village) Bpk. Suroso hadi (Head of Kumbara Utama Village)	face to face interview
Labor Union – PUK SPSI	Bpk. Siswanto as Chief of PUK SPSI PBD Bpk. A. Stenly T. as Secretary's PUK SPSI PBD Bpk. Walim Waluyan Chief of PUK SPSI Buatan I Group. Bpk. Denny Andri Anno as secretary PUK SPSI Buatan I Group.	face to face interview
Government Departments	Environmental Office of Pelalawan Regency: Bpk. Demsi Suridal (Kasi. Perlindungan) Department of Plantation in Pelalawan Regency: Bpk. Heri Hadiasyah Putra, (Kepala Seksi Bina Usaha Dinas Kehutanan dan Perkebunan Kabupaten Pelalawan) Department of Manpower of Pelalawan Regency: Bpk. Iskandar	Consultation was conducted by phone to prevent the covid-19 outbreak and follow the social distancing policy.
NGO	FKPPKS (Forum Komunikasi Petani PIR Kelapa Sawit)	face to face interview

Stakeholders comment	
1	<p>Feedbacks: Dinas Perkebunan Kabupaten Pelalawan – Plantation Agency Pelalawan Regency Bpk. Heri Hadiasyah Putra</p> <ul style="list-style-type: none"> PT Inti Indosawit Subur – Buatan Group POM has obtained HGU and in line with spatial planning for Pelalawan Regency, as cultivation/plantation area. Company has reported the plantation operation activities on regular basis to "Dinas Kehutanan dan Perkebunan Kabupaten Pelalawan Semester II 2021". In the 2021-2022 period, there are no issues that arise from the surrounding community or other institutions. The company has obtained Plantation Business Permit (IUP)

	<ul style="list-style-type: none"> • There is no report related to land claim and land dispute occurred and submit by community or other company. • If the plasma replanting program has been agreed upon by all parties, so the program could be submitted to the Pelalawan District Plantation Office. • FFB price established based on market price, and company was not bound to FFB price regulated by "Keputusan Penyusunan Harga TBS Propinsi Riau". Based on report, PT Inti Indosawit Subur – Buatan I POM has price structure better than other companies.
	<p>Audit Team verification and response:</p> <ul style="list-style-type: none"> • The audit team had verified PT Inti Indosawit Subur – Artificial Group related to the palm oil replanting program in the Artificial Plasma Group. • Verification on the pricing of FFB in Plasma Buatan Group has been carried out by verifying the letter from FKPPKS dated October 10, 2021 as well as a reply to the letter from the Management of Plasma Buatan group on October 22, 2022 which has agreed to fix the price of FFB regulation
<p>2</p>	<p>Feedbacks: Environmental office of Pelalawan Regency - Dinas Lingkungan Hidup Kabupaten Pelalawan Bpk. Demsi Suridal (Kasi. Perlindungan)</p> <ul style="list-style-type: none"> • Company has revised the AMDAL document. • Company has an environmental document related to development of biogas plant and kernel crushing plant. • Replanting activity has been covered in environmental management and monitoring plan. • Company has consistently reporting the environmental management: Laporan RKL-RPL, Laporan Pengelolaan Limbah B3, Laporan Pemanfaatan Limbah Cair. • PT Inti Indosawit Subur – Buatan POM has performed environmental management in good manner. • Hazardous waste/LB3 monitoring report on Shelter Temporary (TPS) Hazardous waste/LB3 has been done. • Company has managed the hazardous waste, obtained permit for temporary storage – in accordance with relevant regulation. • There is one complaint raised during the last audit until this onsite Recertification audit. <p>Audit Team verification and response: The audit team has verified the complaints from the community around the Kerinci River based on reports from the people around the Kerinci River to the Pelalawan Regency Environmental Service on January 7, 2022 regarding the pollution of the Kerinci River caused by activities in Buatan I POM. Some results of laboratory examinations of Kerinci river water samples:</p> <ul style="list-style-type: none"> • Test Result Report No. 0030-0038/LHU/LKL-PR/I/2022 dated January 10, 2022; for the water sample of the Lower Kerinci River. There is no measurement result that exceeds the quality standard. • Test Result Report No. 0030-0037/LHU/LKL-PR/I/2022 dated January 10, 2022; for water samples from the Kerinci River where the fish died. There is no measurement result that exceeds the quality standard. • Test Result Report No. 0030-0036/LHU/LKL-PR/I/2022 dated January 10, 2022; for the water sample of the Central Kerinci River. There is no measurement result that exceeds the quality standard
<p>3</p>	<p>Feedbacks: Department of Manpower of Pelalawan Regency: Bpk. Iskandar (Kabid Hubinsyakar)</p> <ol style="list-style-type: none"> 1. Generally, PT Inti Indosawit – Buatan I POM has built good communication with Manpower and Transmigration Office – Pelalawan Regency.

	<p>2. PT Inti Indosawit Subur – Buatan I POM has complied well with legislation related to employment, i.e;</p> <ul style="list-style-type: none"> • Company has provided all normative rights for employee, such as salary as lined out in minimum wage for province level, leave entitlement, employees registered with social insurance for worker (BPJS), benefit for religious festival, provision of facilities (housing, electricity, clean water, medical clinic, school/school bus, worship house, personal protective equipment, working tools, etc.). • There was no report/complaint logged in related to discriminative action by company. There was no report/complaint logged in related to the use of child worker/under age worker. • Company has submitted health and safety performance report regularly to the manpower agency. • Complaint received from worker union related to medical service provided by “BPJS Kesehatan”, in particular medical treatment service from hospital/clinic where no cooperation with BPJS. • There is no industrial relationship dispute occurred from the last year. • No identified issues related to the use of child labor, violence and forced labor. • Company has prepared infrastructure and facility for worker’s welfare such as: housing, clean water, electricity, medical facility, education, etc. • There are employees who are identified use of drugs/Narcotic in PT Inti Indosawit Subur – Buatan I POM. <p>Suggestions:</p> <ul style="list-style-type: none"> • In relation to the daily worker (PHL), so that the appointment program can be made as a permanent worker if it meets the requirements. • PKB is still made by HO Medan, can be considered to make Derivative PKB <p>Audit Team verification and response:</p> <ul style="list-style-type: none"> • The company has taken action in accordance with well-established procedures and persuasive approach, so there is no turmoil/issue. • With respect to wages, the use of PPE and SIO, the company has implemented in accordance with relevant law and regulations. • Regarding PHL workers who are still in Buatan Group Plantations, the team of auditors will always verify the progress of the PHL employee program to become permanent employees. • Regarding the formation of PKB derived from PUK SPSI, the auditor team will carry out verification at the next audit visit.
<p>4</p>	<p>Feedbacks: NGO; Forum Komunikasi Petani PIR Kelapa Sawit (FKPPKS) Bpk. Sunardi</p> <p>The price of FFB is determined based on the market price, and the company is not bound by the price of FFB as regulated in the “Decisions on Formulating FFB Prices for Riau Province”. Based on the report, PT Inti Indosat Subur – Buatan POM I have a better price structure than other companies. However, in the 2021-2022 period, there is uncertainty in the pricing of FFB by plasma farmers made by the Group.</p> <p>Audit Team verification and response: Acknowledge by the auditor as a positive response, and will be monitored at each subsequent audit.</p>
<p>5</p>	<p>Feedbacks: Head of Simpang Perak Jaya Village Bpk. Rubiman Zianur Head of Kumbara Utama Village: Bpk. Suroso</p>

	<ul style="list-style-type: none"> • Villagers around ethnically are Batak, Javanese, Sundanese and Banjar. • There was no land conflict between company with surrounding community. • No land conflict was reported since hand-over was done in proper settlement in the beginning. • In general communication and coordination between the village government and the Company has been running well. • The Company always responds to any problems submitted by the village government officials or from the surrounding community, villagers have confirmed that organisation has done some positive CSR activities on their surroundings. Routinely companies provide assistance through CSR programs in the form of borrowing heavy equipment (excavators, graders and compactors), scholarships, assistance to the poor, religious facilities, etc. • Access roads surrounding villages are always maintained by the company. • Enclave owner has proper access to their own farm inside company's farm without any difficulties. • Employee recruitment from the surrounding villages was not adequate. • No identified issues related to the use of child labor, violence and forced labor • There are no reports from the public regarding the operational activities of companies that violate Human Rights such as the Right to Organize and assemble Conduct worship in accordance with beliefs, as well as other practices of violation of Rights such as the use of mercenaries for the intimidation of workers, the sale of human beings etc.
	<p>Audit Team verification and response:</p> <ul style="list-style-type: none"> • is suggested that PT Inti Indosawit Subur – Buatan Group can maintain communication with the community and village apparatus. • CSR programs to be developed in accordance with community empowerment programs and guidance and coaching. • The use of labor to be prioritized to the surrounding community by referring to recruitment procedures.
<p>6</p>	<p>Feedbacks:</p> <p>Union Labor –PUK SPSI: Bpk. Siswanto as Chief of PUK SPSI PBD Bpk. A. Stenly T. as Secretary's PUK SPSI PBD Bpk. Walim Waluyan Chief of PUK SPSI Buatan I Group. Bpk. Denny Andri Anno as secretary PUK SPSI Buatan I Group.</p> <ul style="list-style-type: none"> • Company and employee has agreed to establish bipartit organization to resolve issued related to industrial relationship; the organization has been registered to "Dinas Tenaga Kerja Kabupaten Pelalawan". Meeting between company and employee conducted whenever issues occurred and requires discussion. • Company has provided health and safety training and provided first aid kit to field supervisor/mandor. • Company has a policy to prohibit the recruitment of employee under 18 years old, including family worker in all operation. • Company does not use migrant worker and prohibit force labour. • Worker salary has followed minimum wage as lined out by Riau Province government for year 2017 • There is a collective working agreement between company and employee. • Company has provided all normative rights for employee, such as salary as lined out in minimum wage for province level, leave entitlement, employees registered with social insurane for worker (BPJS), benefit for religious festival, provision of facilities (housing, electricity, clean water, medical clinic, school/school bus, worship house, personal protective equipment, working tools, etc.).

	<p>Audit Team verification and response: Acknowledge by the auditor as a positive response, and will be monitored at each subsequent audit. Audit team will continue to monitor PT Inti Indosawit Subur – Buatan I POM related to Plantation management and monitoring performance.</p>
7	<p>Feedbacks: Gender Committee: Ibu Yusniarty (Chief of Gender Committee in Scheme Smallholder PT Inti Indosawit Subur - Buatan Group)</p> <ul style="list-style-type: none"> • Company has implemented the policy related to protection reproductive right; such as not hiring female for work activity with high risk; monthly pregnancy test for sprayer and fertilizer applicator; 6-monthly check up for sprayer and fertilizer applicator. • All female worker in sprayer team and fertilizer team shall join pregnancy test in company clinic, once a month. • There has been no report logged in to committee related to sexual harassment and/or violence. • There is no indication that company practicing sexual harassment, no indication of gender discrimination, no indication of human right violation, and forced labour. • The leader of gender committee has not understood what the work program is and procedure in case of sexual harassment <p>Audit Team verification and response: Audit team will continue to monitor PT Inti Indosawit Subur – Buatan I POM related to Plantation management and monitoring performance.</p>

List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
Nil					
PT Inti Indosawit Subur – Buatan I POM has established since 1985 and has planting palm oil since 1988, 1989, 1990 and 1991. Currently the palm oil has been replanting since 2014 – 2021.					

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

3.5 Impartiality and conflict of interest

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

Formal Signing-off of Assessment Conclusion and Recommendation

The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that PT Inti Indosawit Subur – Buatan I POM has complied with the RSPO Principles and Criteria 2018, Indonesia National Interpretation 2020 for Sustainable Palm Oil and audit criteria identified within the audit report. It is deemed that the management system continues to achieve its intended outcomes. Therefore, it is recommended that the certification of PT Inti Indosawit Subur – Buatan I POM is continued.

Report prepared by	Acceptance of Assessment Conclusion
Name: Imam Fakhrurozi	Name: Putu Grhyate Yonata Aksa
Company Name: BSI Services Malaysia Sdn. Bhd	Company Name: PT Inti Indosawit Subur – Buatan I
Title: Lead Auditor	Title: Sustainability Operation & CSR
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 September 2022	Date: 21 October 2022

Appendix A: Summary of Findings

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

		<p>recording of deliberation process and compensation).</p> <p>8. Negotiation procedures (Recording of deliberation process and compensation)</p> <p>9. Continuous improvement plans (Continuous Improvement Program)</p> <p>10. Human Rights Policy including in the Company Policy update on 1 December 2019 including the policy on protection of human rights defenders (HRDs)/Whistle-blowers.</p> <p>11. The document mentioned above can be accessed by stakeholders by making an official application to the management so that it can be published. Requests for information/document can be in the form of verbal or official letters, requests for information / documents will be received by the Public Relations / KTU and recorded in the log book.</p>	
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders.	<p>PT Inti Indosawit Subur – Buatan Group has provide public information in Bahasa Indonesia. The information contain in the document can be understand by stakeholders. It was confirmed by audit team during stakeholder consultation. There are 32 information accessible by stakeholder as explain above in indicator 1.1.1.</p> <p>The list of information has been disseminated on 2-7 February 2021 to all operation at workplace and stakeholder as well.</p> <p>Corporate policy was socialized/disseminated to all levels of PT Inti Indosawit Subur – Buatan Group employees on 10-12 February 2022 (list of participants can be shown) and on stakeholders (including local contractors) on 23-24 March 2022 which was attended by 25 stakeholders. Evidence of socialization can be shown during audit.</p>	Complied
1.1.3	(C) Records of requests for information and responses are maintained.	<p>Requests for information are responded by the department concerned in accordance with their authority. The company has developed a matrix describing the status of each information request and responsible to respond into. The company has appointed personal responsibility in accepting and responding to the request for information from the</p>	Complied

		<p>stakeholders, the personal responsible is the HUMAS (Public Relations). Appointment based on Transfer Letter No. 226/HRD/AA/TL/XI/2014 dated 7 November 2014 and also organisation raised the Internal Memorandum No. 388/ES-KBN/MEMO/06/2015 dated 1 June 2015 related to Duties and Responsibilities of Buatan Group Public Relations to Mr. Lindu Simatupang (as a Public Relation on PT Inti Indosawit Subur – Buatan Group).</p> <p>Certification holder has a procedure of consultation and communication documented as SOP No. AA-GL-5008.1-R1: <i>Penanganan Permintaan Informasi Stakeholder</i>. The consultation and communication procedure was socialized to stakeholder on on 10-12 February 2021 (list of participants can be shown) and on stakeholders (including local contractors) on 23-24 March 2021 which was attended by 31 stakeholders.</p> <p>Records of response of request information is documented in the same book, consist of person handle the request, information given and acknowledgement from the person in-charge and signature. Record of incoming communication available in each estate and mill unit.</p> <p>The request for information was recorded in Log Book "<i>Surat Masuk dan Keluar</i>" on period 2021-2022, taken example:</p> <p>Buatan I Estate:</p> <ul style="list-style-type: none"> • On 21 January 2022, request for information from Bappeda Pelalawan Regency Letter no. 050/Bappeda-V/2022/47 related to Request for CSR Implementation Reporting and was responded to by Public Relations on January 21, 2022. • Request for information from Head of Pangkalana Kerinci Village on 15 January 2022 by letter no. 006/Pemdes-KB/I/2022 related request for discussion Related to TKD (Tanah Kas Desa) and CSR cooperation and was responded on 15 January 2022 by Humas-Public Relations. • Request for information from from Head of Mekar Jaya Village on 18 April 2022 by letter no. 031/PEMDES/KB/IV/2022 related Requests for assistances of the coral stone procurement and was responded by 	
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		<p>Humas on 18 April 2022.</p> <p>Smallholder Scheme</p> <p>Request Information and response from Stakeholder is documented in log book "<i>Kebun Plasma Buatan</i>". Up to May 2022, there was 8 information requests in Plasma/smallholder Division, mostly request EFB for fertilizer in scheme smallholder area. Based on procedure stated that responds for information request within 14 days.</p> <p>Sample seen:</p> <ul style="list-style-type: none"> • Request information from farmer's KUD Jaya Makmur on 23 February 2022, related of information FFB acceptance to Buatan I Mill, it was responded on 23 February 2022 by the Chairman of KUD Jaya Makmur. • Request information from the farmer of KUD Sumber Rejeki on April 2, 2022 about the KCL fertilizer the first half of 2022, was responded by the Chairman of the KUD Sumber Rejeki that the fertilizer will be sent on April 4, 2022. • On February 16, 2022, request for information from KUD Sumber Rejeki (SP-V) letter No. 60/KUD-SR/II/2022, regarding the replanting socialization and was responded to on February 16, 2022, which will be carried out on February 20, 2022. <p>Based on the verification of the information logbook document, all requests for information from stakeholders and other related parties have been responded to in accordance with established procedures.</p> <p>During interview with stakeholder confirmed that if there is an information request from stakeholder, company immediately respond to them. No issue regarding the timeline of information request response from PT Inti Indosawit Subur – Buatan Group.</p>	
1.1.4	<p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official.</p>	<p>Certification holder has a procedure of consultation and communication as per SOP No. AA-GL-5008.1-R1: <i>Penanganan Permintaan Informasi Stakeholder</i>. This procedure is available in Bahasa Indonesia and can be</p>	Complied

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		<p>access by stakeholder. The consultation and communication procedure was socialized to stakeholder on on 10-12 February 2021 (list of participants can be shown) and on stakeholders (including local contractors) on 23-24 March 2021 which was attended by 31 stakeholders.</p> <p>The company has appointed personal responsible in accepting and responding to requests for information from the stakeholders. The personal responsible is the HUMAS (Public Relations). Appointment based on Transfer Letter No. 226/HRD/AA/TL/XI/2014 dated 7 November 2014 and Internal Memorandum No. 388/ES-KBN/MEMO/06/2015 dated 1 June 2015 related to Duties and Responsibilities of Buatan Group Public Relations to Mr. Lindu Simatupang (as a Public Relation on PT Inti Indosawit Subur – Buatan Group). The Internal Memorandum has explained about the duties and responsibilities of public relations, including: is responsible for receiving and responding to information from stakeholders.</p> <p>Records of response to request information is documented in the same book, consist of person handle the request, information given and acknowledgement from the person in-charge and signature. Record of incoming communication available in each estate and mill unit.</p> <p>The request for information was recorded on Log Book “<i>Surat Masuk dan Keluar</i>” on period 2021-2022 (up to May 2022), sample taken:</p> <ul style="list-style-type: none"> • On 21 January 2022, request for information from Bappeda Pelalawan Regency Letter no. 050/Bappeda-V/2022/47 related to Request for CSR Implementation Reporting and was responded to by Public Relations on January 21, 2022. • Request for information from Head of Pangkalana Kerinci Village on 15 January 2022 by letter no. 006/Pemdes-KB/I/2022 related request for discussion Related to TKD (Tanah Kas Desa) and CSR cooperation and was responded on 15 January 2022 by Humas-Public Relations. • Request for information from from Head of Mekar Jaya Village on 18 April 2022 by letter no. 031/PEMDES/KB/IV/2022 related Requests for 	
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		<p>assistances of the coral stone procurement and was responded by Humas on 18 April 2022.</p> <p>Smallholder Scheme</p> <p>The scheme smallholders have a mechanism of consultation and communication in "<i>Mekanisme Komunikasi, Konsultasi dan Keluhan</i>", dated 3rd January 2011. The procedure has been communicated to all members on 14 February 2020 and also recorded into the "<i>Buku Pintar</i>" for each of farmer. Meanwhile, each KUD has determined the personality who is in charge/responsible related to communication and communication, based on the Management Decree, as follows:</p> <ol style="list-style-type: none"> 1. Decree/SK No. 6 Kpts/KUD-BM/II/2018 dated 10 February 2018 concerning the appointment of communication and consultation officers at KUD Bhakti Mandiri to Bpk. Sugeng. 2. Decree/SK No. 6 Kpts/KUD-JM/I/2021 dated 09 January 2021 concerning the appointment of communication and consultation officers at KUD Jaya Makmur to Bpk. Wilis. 3. Decree/SK No. 4 Kpts/II/2018 dated 15 February 2018 concerning the appointment of communication and consultation officers at KUD Sejahtera to Bpk. Agusmiran. 4. Decree/SK No. 2/Kpts/KUD-SR/I/2020dated 11 January 2020 concerning the appointment of communication and consultation officers at KUD Sumber Rezeki to Bpk. Sumarlan. <p>Request Information and response from Stakeholder is documented into a log book "<i>Kebun Plasma Buatan</i>", up to May 2022, there was 9 information requests in Plasma/smallholder Division, mostly request EFB for fertilizer in scheme smallholder area. Based on procedure stated that responds for information request within 14 days.</p> <p>Sample taken:</p> <ul style="list-style-type: none"> • On February 22, 2022, request for information from FKPPIR letter no. 	
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		<p>110/KUD-SP VI/2022, regarding Changes in schedule and transport of TBS Plasma SP-6, was responded to on February 23, 2022.</p> <ul style="list-style-type: none"> On March 13, 2022, request for information from KUD Jaya Makmur (SP-4) letter No. 013/KUD-JM/03/2022, regarding Call for not to take off cattle animals (cow) in replanting area and was responded on March 14, 2022. In October 2021, scheme smallholder Buatan through FKPPKS (Forum Komunikasi Petani PIR Sawit Perkebunan Buatan) made a letter no. 003/FKPPKS-X/2021 regarding the application for plasma FFB prices. Response: Buatan Plasma Manager has held a meeting with FKPPKS related to plasma FFB pricing on October 22, 2021 and resulted in a FFB price agreement based on Letter No. 184/ES-KLB/EXT/10/2021 dated October 22, 2021 calm Buatan Plasma FFB Market Pricing, mention that Market pricing of FFB outside of PBS and PBD will take effect on October 22, 2021, until the replanting period. <p>Based on the sample above that request response information was taken in accordance with the procedures.</p>	
1.1.5	An up-to-date list of contacts and detailed stakeholder information is available along with designated representatives.	<p>Buatan I POM, Estate and Scheme Smallholder:</p> <p>PT Inti Indosawit Subur - Buatan Group Stakeholder has maintained list of stakeholder updated on May 2022. The List of stakeholders consists of stakeholders based on regional levels: village, provincial and national districts (81 stakeholders), including NGO, for example: FSP NIBA KSPSI, LPAI (Lembaga Perlindungan Anak dan Ibu) and LCKI (Lembaga Cegah Kejahatan Indonesia).</p> <p>The list of stakeholders presented with address, name of person and phone number and also position and title. The list is including of regent of Pelalawan, Environment Agency, Social Office & Workers of Pelalawan and Siak Regency, Camat Kerinci Kanan, Head of Village Mekar Jaya and Head of Village Makmur etc.</p>	Complied

Criteria 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.	<p>Buatan I POM and Estate:</p> <p>The company has a corporate policy set on 1 December 2019 in Medan which was ratified by the Managing Director (Kevin Tio). The company's policy confirms the code of Conduct behaviour in business at point 2); Policy on the conduct of fair and ethical business on all transactions and business operating, including the prohibition of all forms of corruption, bribery and fraud in the use of funds and resources.</p> <p>In the employee selection process, the company has sets policies related the conduct of business ethics in the daily worker agreement (<i>Perjanjian Kerja Harian Lepas</i>), which is stated in the appendix to corporate policies and behaviors that must be complied with. PKB is a joint working agreement for permanent workers, also confirmed about the conduct of business ethics in Article 16 related of the behavior of the bcynical ethics in the company.</p> <p>The company's policy is also published using posters at any strategic places in the plantations (Buatan Estate and Mill). Corporate policy has been socialized/dissemination to all levels of PT Inti Indosawit Subur – Buatan Grup on on 10-12 February 2021 (list of participants can be shown) and on stakeholders (including local contractors) on 23-24 March 2021 which was attended by 31 stakeholders.</p> <p>A Policy for ethical conduct is including on Company policy was socialized/delivered to all levels of PT Inti Indosawit Subur – Buatan Group employees on on 10-12 February 2021 (list of participants can be shown) and on stakeholders (including local contractors) on 23-24 March 2021 which was attended by 31 stakeholders.</p> <p>Scheme Smallholder:</p> <p>All KUD has prepared the policy on code of ethical conduct and integrity in all operation and transaction, for example: In KUD Bhakti Mandiri was</p>	Complied

		<p>established on 20 February 2022, in KUD Jaya Makmur was set on 22 February 2022, in KUD Sumber Rezeki was set on 27 February 2022 and also in KUD Sejahtera was set on 18 February 2022, which stated: <i>"Berkomitmen dalam perilaku etis dalam berbisnis dalam seluruh transaksi dan operasi bisnis, pelarangan seluruh bentuk korupsi, penyuapan dan penipuan dalam penggunaan dana dan sumber daya"</i>. This policy was communicated to the members. The evidence can be demonstrated during audit such as attendant list and photograph.</p> <p>The policy is written in farmer handbook <i>"Buku Panduan Petani"</i>. The implementation of said policy in form of dissemination of anti-corruption policy, transparency in expenditure for road maintenance, fair calculation of worker payment, good quality FFB.</p>	
1.2.2	<p>A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.</p>	<p>Buatan I POM, Estate and Scheme Smallholder:</p> <p>The certificate holder has a system or mechanism to monitor the implementation of company policies including the company code of ethics. GM and Public Relations provide responses to an information/case based on the AA GL-5008.1 R1 Procedure, which for the next mechanism is based on the Settlement Procedure with the local community (Procedure No. AA-GL-5009.R1 regarding settlement with the local community, this mechanism also explain related to the reporter's guarantee and disclosure of cases or information.</p> <p>In every transaction resulting from the work that has been completed, Buatan I Group has a mechanism to monitor business ethics policies, for example: in each work completion, a <i>"Berita Acara Penyelesaian Pekerjaan"</i> which has been verified by the Field Assistant and known by the Estate Manager must be made both inti and plasma plantations (smallholders).</p> <p>PT Inti Indosawit Subur - Buatan I Group also conducts internal audit to ensure that the company's policies were implemented properly. The last internal audit was carried out on 9 – 14 May 2022.</p>	Complied

Principle 2: Operate legally and respect rights			
Implement legal requirements as the basic principles of operation in any jurisdiction.			
Criteria 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	(C) The unit of certification complies to relevant regulations.	<p>There were no changes of legal requirement of the company. The Certificate Holder is able to demonstrate evidence of compliance with relevant legal requirement. All legal requirements are complied, including those related to land status, occupational health and safety, environmental, labour, agricultural practice, and mill operation, such as:</p> <ul style="list-style-type: none"> • Ijin Prinsip (Principle permit) No.KB.320/859/Mentan/XI/1983 dated 7th November 1983 from Agriculture minister (65,000 Ha). • Ijin lokasi (Location Permit) No.KPTS.57/II/1987, dated 4th February 1987 for 32,000 Ha. • Ijin Pelepasan kawasan from Forestry Ministry (Release forest permit) No.664/Kpts-II/89, dated 31st October 1989. • Ijin pembukaan lahan (land clearing permit) No.1536/II/KW-6/1988, dated 2nd November 1988 from Forestry Ministry Region Riau Province. • Surat Keterangan Pendaftaran Tanah (Land register) from land authority of Pelalawan District No.15/SKPT/X/2004, dated 30th September 2004. • Surat Pendaftaran Usaha Perkebunan (SPUP) from Forestry and Plantation Ministry, No.185/Mentanhut/VII/2000, dated 3rd November 2000. • SK. HGU (Land Title), approved by "Menteri Negara Agraria/Kepala BPN No.10/HGU/1993, dated 13th May 1993 tentang Pemberian HGU atas nama PT. Inti Indosawit Subur, atas tanah di Kabupaten Kampar seluas 5,781.47 Ha". • HGU (Land titles) No.01, 1993, dated June 19th, 1993. for Buatan Estate (5,781 Ha); 	Complied

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		<ul style="list-style-type: none"> • Renewal land title No.145/HGU/BPN/2004, dated November 3rd, 2004. Expired until 2058 from Head of BPN (5,781 Ha); • IMB (Building licenses), there were 6 permits, such as; No.106/2009, 71/2009, 09/2009, 11/1992, 56/2009, 117/1997. • AMDAL (Environmental and Social impact assessment), SEIA No.013/ANDAL/BA/V/95, dated 3rd May 1995, by Agriculture of Ministry. • Revised AMDAL (Dokumen Pengelolaan dan Pemantauan lingkungan) approved by Governor of Riau No.KPTS 975/X/2009, dated 28th October 2009. • Surface water usage permit from Dinas Pertambangan dan Energi, Kabupaten Pelalawan No.14/KPTS/M/2018, dated 5 January 2018 (valid until 4 January 2023). • Temporary hazardous waste store permit No. KPTS.503/BPMP2T-PLY/14/2016 from "Badan Penanaman Modal dan Pelayanan Perijinan Terpadu, Kabupaten Pelalawan", dated 18th March 2016 (valid until 17th March 2021). • Penetapan Kelas Usaha Perkebunan (PKUP) is based on Decree of Bupati Pelalawan Regency no. 107 Tahun 2016 on 7 November 2016 regarding "Penetapan Kelas Usaha Perkebunan Pelalawan 2016 with class: I referring to Permentan No. 98/Permentan/OT.140/9/2013 regarding "Pedoman Perizinan Usaha Perkebunan". • Machinery permit in mill in place. <p>Mill machineries permit:</p> <ul style="list-style-type: none"> • Permit for Sterilizer reference number: 03/B.0050.A and 03/B.0051.A issued on 19th October 1992 for capacity 3.25 kg/cm²; reference number: 113/BU/PL/2004 and 114/BU/PL/2004 issued on 14th December 2004 for capacity 3.5 kg/cm². • Permit for Back Pressure Vessel reference number: 115/BU/PL/2004 	
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		<p>issued on 14th December 2004 for capacity 3.5 kg/cm2.</p> <ul style="list-style-type: none"> • Permit for Boiler reference number: 035/KU/PLLWN/2003 issued on 20th October 2003 for capacity 24 kg/cm2; reference number: 117/KU/PL/2004 issued on October 2004 for capacity 24 kg/cm2; reference number: 112/KU/PL/2004 issued on 30th October 2003 for capacity 24 kg/cm2. • Permit for Diesel engine, reference number: 135/M-MD/PL/2004 and 135/M-MD/PL/2004 issued on October 2004 for capacity 420 horsepower each. • Permit for Compressor, reference number: B.84/BT-M/W4/VI/1997 and B.86/BT-M/W4/VI/1997 issued on 17th September 1997. • Permit for Turbine, reference number: 003/M— TB/Plwn/2002 issued on July 2002 for capacity 800 KW; and reference number 83/TU/PLLWN/2004 issued on 1st September 2003 for capacity 1.200 KW. • All machineries were checked regularly by local government with the latest inspection was on 2018 and for 2019 several machinery inspection are being process, for example: Sterilizer 1 ref. no. 027/BU/PL/2005 is still in process still in progress of submission dated 23 May 2019. <p>Scheme Smallholder:</p> <p>Group manager and ICS conducted the evaluation of laws and regulation compliance each year. Latest updated was on 15 February 2022. During audit, Group manager can demonstrated the document of "Evaluasi Kepatuhan Hukum Kebun Plasma Buatan Tahun 2022" which contain the list/'legal register' of all applicable laws and regulations; consist of: list of regulation, requirement, evaluation record, compliance status, type of document, no. document, validity, source of document, remark. Some example showing compliance to relevant regulation as follows: Smallholder</p>	
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No.1732, 1731, 2614, 2620, 1510, 1522 and 1523 they have land title/SHM and paid the tax accordingly – in order to demonstrate legal compliance.

Scheme Smallholder Sample:

KUD Jaya Makmur

- Akte Pendirian Koperasi- Cooperative Establishment Deed: Akta Perubahan Anggaran atas nama Koperasi Unit Desa Jaya Makmur and endorsement by Departemen Koperasi dan Pembinaan Pengusaha Kecil SK no. 1885/BH/XIII dated 8 July 1994.
- SHM- land title certificate held by each farmer, sample has taken as below.
- NPWP- taxpayer number: 01.746.748.1-222.000
- TDP (Tanda Daftar Perusahaan Koperasi-Sign of Cooperative Company List): no. 04 12 252 00 0242, dated 2 December 2016 valid until 26 October 2020
- SITU Surat Izin Usaha Perdagangan (SIUP) Menengah Kecil-Small Business Trading License: no. 0781/04.12/PK/X/ 2015, dated 26 October 2015.
- *Surat Izin Tempat Usaha* issued by Subdistrict Head of Siak, Bengkalis District, SITU no. 523.33/SITU/VIII/2015/013 dated 28 August 2015 validation for 5 years (28 August 2020).
- Sample of private 24 land right:

Name	Plot/KT	Kavling	Scope (Ha)	Private land right number	Issued date
Pardiono	56	1446	2	787	24-Sep-94
Muji Yasin	56	1449	2	5223	18-Mar-09
Sakum	56	1451	2	774	24-Sep-94
Ahmad Saeri	56	1475	2	775	24-Sep-94

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		Sudiono	56	1499	2	770	24-Sep-94		
		Hardo Saronto	56	1501	2	789	24-Sep-94		
		Ngadi	60	1604	2	727	24-Sep-94		
		Nasib Wiyono	60	1619	2	-	24-Sep-94		
		Sukardi	60	1644	2	776	23-Oct-95		
		Rusnadi	60	1645	2	819	24-Sep-94		
		Sikus	60	1647	2	111	24-Sep-94		
		Suprpto	60	1710	2	732	24-Sep-94		
		Khadar	97	1568	2	699	23-Oct-95		
		Wiranto	97	1571	2	701	23-Oct-95		
		Jumian	97	1577	2	709	23-Oct-95		
		Mahyun	97	1579	2	698	23-Oct-95		
		Akamudin	97	1580	2	705	23-Oct-95		
		Viktor Parluhutan Lubis	97	1582	2	703	23-Oct-95		
		Poniman Surip	99	1678	2	235	23-Oct-95		
		Supatmo	99	1680	2	783	23-Oct-95		
		Slamet	99	1719	2	749	23-Oct-95		
		Abdul Manaf	99	1720	2	747	23-Oct-95		
		Salimin	99	1724	2	743	23-Oct-95		
		Suyari	99	1725	2	742	23-Oct-95		
		KUD Sumber Rezeki							

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- Akte Pendirian Koperasi - Cooperative Establishment Deed: Akta Perubahan Anggaran atas nama Koperasi Unit Desa Sumber Rezeki and endorsement by Departemen Koperasi dan Pembinaan Pengusaha Kecil SK no. 103/BH/PAD/KWK.4/5.1/II/1996 dated 19 February 1996.
- SHM- land title certificate: held by each farmer, sample has taken as below.
- NPWP- taxpayer number: 02.174.813.2-222.000
- TDP (Tanda Daftar Perusahaan Koperasi-Sign of Cooperative Company List): no. 04 14 19 252 00 0018, dated 14 February 2019 valid until 14 February 2024.
- Surat Izin Usaha Perdagangan (SIUP) Menengah Kecil-Small Business Trading License: no. 04.19/SIUP/2019/02, dated 14 February 2019, validation for 5 year (14 February 2024).
- Surat Izin Tempat Usaha (SITU) yang dikeluarkan oleh Camat Kerinci Kanan, Kabupaten Siak, SITU no. 523.33/SITU/II/2019/06 dated 14 February 2019 validation for 5 years (14 February 24).
- Sample of private 24 land right:

Name	Plot	Kavling	Scope (Ha)	Private land right number	Issued date
Kamiso	100	1732	2	773	1995
Munasan		1731	2	768	1995
Salam		1728	2	760	1995
Edi		1674	2	770	1995
Salam		1727	2	758	1995
Suradi		1740	2	756	1995
Muh		73	2169	2	198

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		Nuryono		2217	2	202	1994		
		Irin		2183	2	226	1994		
		Runiah		2182	2	209	1994		
		Nisman		2220	2	219	1994		
		Suwanto		2098	2	199	1994		
		Karlan	67	2010	2	113	1994		
		Munawin		2125	2	110	1994		
		Parlaungan Panjaitan		2014	2	117	1994		
		Parlaungan Panjaitan		2024	2	96	1994		
		Monang Manulang		2048	2	105	1994		
		Neri		2046	2	99	1994		
		Sujito	68	2134	2	141	1994		
		Utar Sutarya		2138	2	173	1994		
		Suhi		2137	2	137	1994		
		Riaman		2142	2	164	1994		
		Slamet		2147	2	139	1994		
		Sumarlan		2146	2	135	1994		
		<p>During this audit, auditor team has visited the smallholder samples which are; KUD Jaya Makmur (17 smallholders sample), KUD Sumber Rejeki (17 smallholders sample). All smallholder plot has been equipped with boundary poles. All boundary poles were in a good condition. Based on the interview</p>							

		with the smallholder and board of KUD's, there is no land dispute issues.	
2.1.2	A documented system for ensuring legal compliance is in place. This system has means to track changes to the law and also includes listing and evidence on evaluation of legal compliance of all contracted third parties, such as: recruitment agencies, service provider and labour contractor.	<p>Public Affair Department (Hubungan Masyarakat) has conducted annual evaluation of legal compliance. The last evaluation is on 15 February 2022 accessible.</p> <p>During audit ASA 2.1, Public Affair Department (Hubungan Masyarakat) has also demonstrated the document of "Evaluasi Kepatuhan Hukum Kebun Plasma Buatan Tahun 2022".</p> <p>Based on the evaluation document obtained information that there are 7 (seven) new regulation related to plantation business. For example, Government Act No. 36 year 2021 related to payments. According to the evaluation, the company has complied with the regulation. Another regulation that has been evaluated was Presidential Regulation No. 44/2020 and Agricultural Minister Decree No. 38/2020 related to Indonesian Sustainable Palm Oil (ISPO).</p>	Complied
2.1.3	Legal or authorized boundaries are clearly demarcated and visibly maintained and there is no planting beyond these legal or authorized boundaries.	<p>According to the national regulation, land title (HGU) holder shall maintain the condition of boundary poles. Based on field visit in Ukui Estate concluded that the boundary poles area well maintained. For example:</p> <ul style="list-style-type: none"> • Boundary poles BPN 16 Block B89b Afdeling III • Boundary poles BPN 17 Block B89b Afdeling III • Boundary poles BPN 20 Block C89i Afdeling IV • Boundary poles BPN 22 Block D89d Afdeling IV <p>The boundary poles recorded in document "<i>Monitoring Pemeriksaan Patok Batas</i>". The poles monitored twice a year. The last monitoring held on 07 December 2021. All poles (59 unit) reported in good condition.</p>	Complied
Criteria 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.			
2.2.1	A list of contracted parties is available.	Certificate holder has a list of contractors in mill and estate. Some of the contract as follows:	Complied

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		<ol style="list-style-type: none"> 1. School Bus on behalf of Sri Rahayu (Contract No. 008/E2KBN/01/2020 dated 1 January 2020). 2. FFB transporter on behalf of Wongso Santoso (Contract No. 009/E2KBN/01/2020 dated 1 January 2020). 3. FFB/EFB transporter on behalf of Parlaungan Panjaitan (Contract No. 010/E2/KBN/01/2020 dated 1 January 2020). 4. CPO, PK and CPKO Transporter on behalf PT Wijaya Multi Prima Lestari (Contract No. SPK No. 05/VI/W/WMPL-IIS/2020 dated 4 June 2020). 5. CPO, PK and CPKO Transporter on behalf CV Trans Cargo Logistic (Contract No. 01/VI/tCL-IIS/2022, dated 6 June 2022). 6. CPO, PK and CPKO Transporter on behalf CV Teman Setia (Contract No. June 2022). 7. CPO, PK and CPKO Transporter on behalf PT Buana Jaya Bersama (Contract No. 03/VI/BJB-IIS/2020, dated 4 June 2020) <p>Smallholder:</p> <p>In smallholder activity, FFB transport from their land to mill by using the association of FFB-Transporter (usually smallholder members that owned truck). For example, sighted the annual FFB-Transporter contract between:</p> <ul style="list-style-type: none"> • KUD Bhakti Mandiri with Siman (FFB Transporter) Bakti Harapan Village, Kerinci Kanan Sub District, Siak District, Agreement No. 11/KUD-BM/VIII/2021 dated 25 November 2021. • KUD Jaya Makmur with Sari (FFB Transporter) Kumbara Utama Village, Kerinci Kanan Sub District, Siak District, Agreement No. 09/KUD-DJM/III/2021 dated 11 March 2021. • KUD Sejahtera with Iwan (FFB Transporter) Bukit Agung Village, Kerinci Kanan Sub District, Siak District, Agreement No. 02/KUD-SJ/X/2021 dated 04 October 2021. 	
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		<ul style="list-style-type: none"> • KUD Sumber Rezeki with Eko Yono (FFB Transporter) Bukit Agung Village, Kerinci Kanan Sub District, Siak District, Agreement No. 01/KUD-SR/XI/2021 dated 25 November 2021. <p>Those four persons was FFB-Transporter representatives.</p> <p>All contract has been verified by the auditor. Based on the interview with the contractor, all working agreement has covered the issues such as occupational safety and health, no underage worker and payments. There are no dispute issues so far.</p>	
2.2.2	<p>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>	<p>FFB supplier from local contractor:</p> <ol style="list-style-type: none"> 1. Djon Rinaldi (CV Putra Kembar Sentosa (PBS-A) → 4,500 Ha 2. Parlaungan Panjaitan (CV Maju Bersama) → 3,000 Ha 3. Ilham (ILM) → 122 Ha 4. Sudiyono (SYN) → 275 Ha 5. Narimin (NRM) → 200 Ha 6. Sunardi → 150 Ha 7. Sawit Jaya Mandiri (SJM) → 150 Ha 8. PT Rimbun Sawit Sejahtera → 5,839 Ha <p>According to company policy regarding to traceability, they has conducted traceability project to verify their supply chain. Refer to sustainability report 2017 – 2018 that can be downloaded in https://www.asianagri.com/images/pdf/2019/Asian%20Agri%20Sustainability%20Report%202017-2018.pdf stated:</p> <p><i>"Asian Agri reinforced its commitment to traceability by engaging Meo Carbon Solution from Germany and SNV from The Netherlands as traceability consultants to assist with our supply chain traceability project. Commencing in October 2018, Asian Agri began supply chain traceability projects in North Sumatra and Riau. These projects complement the first traceability verification programmes for our partner independent</i></p>	Complied

		<p><i>smallholders in Jambi Province which began in 2016 and were done in collaboration with IDH and Yayasan SETARA Jambi. These ongoing projects will eventually provide us with recommendations on how to further improve our systems and procedures for a more traceable and responsibly supply chain”.</i></p> <p>During this onsite audit, there are two additional supplier which is Sawit Jaya Mandiri (long term agreement) and PT Rimbun Sawit Sejahtera (short term agreement – due to their mill under repaired). Based on document verification and interview with Create Share Value (CSV) staff obtained information that both suppliers have been verified and visited by FFB purchasing staff. By visited the suppliers land and tagged the coordinate, mill expected the FFB source comes from traceable and responsible area. The list of legal documents verified as follows:</p> <ul style="list-style-type: none"> • List of supplier member • Coordinate and its overlay RTRW map. • Personal tax identification of Sawit Jaya Mandiri. • Business permit ID. • Trading permit ID. • Environmental permit. • Location permit • Registration of health insurance (BPJS Kesehatan) • Copy of bank account <p>Based on document verification report above, the CSV staff submitted the report of verification to FFB Purchase Department to issue the Agreement Letter (Surat Perjanjian Kerjasama). There is an Agreement Letter on FFB Supply No. 01/CSV-KBN/II/2020 dated 10 February 2020.</p>	
2.2.3	All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour.	Third party contract with some FFB has completed with some important clause such as:	

		<ul style="list-style-type: none"> The company policy related to children/underage worker, anti-drugs etc. Workers payment referred to local minimum payment's regulation. All worker will be register in health insurance and workers insurance according to national regulation. <p>The same regulation also implemented in smallholder scheme. All of contract data kept by Head Clerk in estate and mill.</p>	
Criteria 2.3: All FFB supplies from outside the unit of certification are from legal sources.			
2.3.1	<p>(C) For all directly sourced FFB, Palm Oil Mill (POM) requires:</p> <ul style="list-style-type: none"> Information regarding the geolocation of FFB origins; Proof of ownership status, right/claim of the land by grower/smallholder; If relevant, valid planting/operational/trading license, or is part of a cooperative which allows the buying and selling of FFB. 	<p>The record of geolocation information has been verified during audit. Auditor has checked the proof of ownership status of all directly sourced FFB.</p> <p>Buatan I POM implemented mass balance module. Mill received FFB from certified and uncertified sources. The last of the supplier is Sawit Jaya Mandiri (long term agreement - Agreement Letter on FFB Supply No. 01/CSV-KBN/II/2020 dated 10 February 2020).</p> <p>Based on document verification and interview during ASA 2.1 - with Create Share Value (CSV) staff obtained information that both suppliers have been verified and visited by FFB purchasing staff. By visited the suppliers land and tagged the coordinate, mill expected the FFB source comes from traceable and responsible area. The list of legal documents verified as follows:</p> <ul style="list-style-type: none"> List of supplier member Coordinate and its overlay RTRW map. Personal tax identification of Sawit Jaya Mandiri. Business permit ID. Trading permit ID. Environmental permit. 	Complied

		<ul style="list-style-type: none"> • Location permit • Registration of health insurance (BPJS Kesehatan) • Copy of bank account <p>Based on document verification report above, the CSV staff submitted the report of verification to FFB Purchase Department to issue the Agreement Letter (Surat Perjanjian Kerjasama).</p>	
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>PT Inti Indosawit Subur – Buatan I POM receive and process FFB from outside supplier, some are collectors.</p> <p>CSV (Create Share Value) are independent smallholder which coached by the company:</p> <ul style="list-style-type: none"> • CV Putra Kembar Sentosa, • CV Maju Bersama, • CV Mandiri Sentosa <p>Each agent has documented statement letter “Pernyataan dan Jaminan”, the statement letter described:</p> <ol style="list-style-type: none"> a. Agent is ready to follow requirements related FFB supplies which determined written or verbal by PT Inti Indosawit Subur. b. FFB supplied to PT Inti Indosawit Subur are coming from area which have been owned/control/cultivated according to the law and regulation related to land ownership, plantation and others. c. FFB supplied to PT Inti Indosawit Subur are not coming from land owned/control/cultivated in but not limited to: <ul style="list-style-type: none"> • Protected forest • Industrial forest • Production forest, including Hutan Produksi Tetap (HP), Hutan Produksi Terbatas (HPT), Hutan Produksi Konversi (HPK), HPK can 	Complied

		<p>be excluded if forest release permit or STD-B (Surat Tanda Daftar Budidaya) demonstrated.</p> <ul style="list-style-type: none"> • Conservation area. <p>d. FFB supplied are not coming from PT Inti Indosawit Subur’s Scheme Smallholders.</p> <p>e. FFB supplied are not coming from PT Inti Indosawit Subur’s or other company’s sortation.</p> <p>f. FFB supplied are not stolen.</p> <p>g. FFB supplied are not obtained by illegal activity.</p> <p>h. FFB supplied are not coming from new planting from forest area after Sep 2014.</p> <p>i. FFB supplied are not coming from new planting peat area after Sep 2014.</p> <p>j. FFB supplied are not coming from land conflict area.</p> <p>k. Zero burning for land clearing and replanting.</p> <p>l. Not employing children under 18 years old, as regulated in Act No.13/2003 regarding manpower.</p> <p>m. Pay employee according to minimum wage determined by government (UMK or UMP).</p> <p>During this onsite ASA 2.1 – year 2022, auditor team has observed the supplier, which is CV Mandiri Sentosa (long term agreement). Based on document verification and interview with Create Share Value (CSV) staff obtained information that both suppliers have been verified and visited by FFB purchasing staff. By visited the suppliers</p> <p>Based on document verification obtained information, CSV Department has conducted area mapping for smallholders and independent suppliers before issuing recommendations for FFB suppliers to mills. Sighted the record of geolocation as per smallholders and supplier.</p>	
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		<p>According to the interview with CSV staff of Buatan Group informed that all the smallholders or independent supplier area are in legally for palm oil plantation. There are no land dispute issues from the village representative or related government agencies obtained.</p> <p>The company has communicated Code of Procurement Ethics (CPOE). COPE is consisted of: Business integrity; fair competition; open communication; conflict of interest; gift and entertainment; compliance to the international trade conventions and policies; mutual principle; declaration of the relationship with RGE Group; compliance to the sustainability framework. COPE provided with channel to report if there is violation to the principles and objectives, through email whistleblow@rgei.com or phone (62) 81 2755 2528.</p>	
<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>PT Inti Indosawti Subur – Buatan Gorup has provided long-term management plan in document <i>Rencana Jangka Panjang period 2020 – 2025</i>. This document described the five-year business projection of PT Inti Indosawit Subur.</p> <p>Long-term management plant of PT Inti Indosawit Subur has documented in <i>Rencana Jangka Panjang period 2020 – 2025</i>. The long-term management plan covered parameter as follows:</p> <ul style="list-style-type: none"> • Hectare statement of mature and immature area • Estimation of production (Tonnes) • Estimation of FFB purchase (for Mass Balance Mill) • Extraction projected (%) • Cost estimation (IDR/Kg) • Estimation of price (IDR/Tonnes) 	Complied

		<ul style="list-style-type: none"> • Estimation of profit (IDR) <p>The same information of long-term management plan document also sighted for smallholders.</p> <p>Based on interview during ASA 2.1 – year 2022, with head clerk and sustainability staff, PT Inti Indosawit Subur has started to engage with independent smallholder named Create Share Value (CSV) near the Inti Indosawit Subur’s concession since a couple year ago and renewed annually.</p> <p>During ASA 2.1 – the engage program for ISH that provided by CSV is provided guidance to smallholder farmers by conducting several training activities, including:</p> <ul style="list-style-type: none"> • Training related to fertilizer use on 4 December 2021 was attended by 200 farmers. • Smallholder Training in Certification Preparation including Group Management (ICS) training was conducted on 4 December 2021. 																															
3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available.	<p>An annual replanting programme projected was as follows (updated in May 2022):</p> <table border="1" data-bbox="1064 975 1758 1340"> <thead> <tr> <th>Year</th> <th>Program (Ha)</th> <th>Realization (Ha)</th> </tr> </thead> <tbody> <tr> <td>2014</td> <td>32</td> <td>32.00</td> </tr> <tr> <td>2015</td> <td>150</td> <td>165.93</td> </tr> <tr> <td>2016</td> <td>200</td> <td>252.00</td> </tr> <tr> <td>2017</td> <td>250</td> <td>228.74</td> </tr> <tr> <td>2018</td> <td>300</td> <td>311.32</td> </tr> <tr> <td>2019</td> <td>400</td> <td>390.06</td> </tr> <tr> <td>2020</td> <td>400</td> <td>384.54</td> </tr> <tr> <td>2021</td> <td>100</td> <td>101.20</td> </tr> <tr> <td>2022</td> <td>100</td> <td>55.20</td> </tr> </tbody> </table>	Year	Program (Ha)	Realization (Ha)	2014	32	32.00	2015	150	165.93	2016	200	252.00	2017	250	228.74	2018	300	311.32	2019	400	390.06	2020	400	384.54	2021	100	101.20	2022	100	55.20	Complied
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		<p>Based on document review and interview with stakeholders, there is no fire usage during the process. All process proceeds by heavy weight for tree falling, chipping, pry the roots, digging etc.</p> <p>Scheme smallholders:</p> <table border="1"> <thead> <tr> <th rowspan="2">SP</th> <th rowspan="2">KUD</th> <th colspan="5">Replanting Program (Ha)</th> </tr> <tr> <th>2019</th> <th>2020</th> <th>2021</th> <th>2022</th> <th>2023</th> </tr> </thead> <tbody> <tr> <td>III</td> <td>Bhakti Mandiri</td> <td>562</td> <td>260</td> <td>158</td> <td>-</td> <td>-</td> </tr> <tr> <td>IV</td> <td>Jaya Makmur</td> <td>-</td> <td>298</td> <td>338</td> <td>284</td> <td>-</td> </tr> <tr> <td>V</td> <td>Sumber Rezeki</td> <td>-</td> <td>-</td> <td>266</td> <td>240</td> <td>-</td> </tr> <tr> <td>VI</td> <td>Sejahtera</td> <td>-</td> <td>-</td> <td>-</td> <td>386</td> <td>314</td> </tr> <tr> <td colspan="2">Grand Total</td> <td>562</td> <td>558</td> <td>762</td> <td>910</td> <td>314</td> </tr> </tbody> </table> <p>Based on document verification and interview with plasma manager informed that there is no replanting realisation in KUD Bhakti Mandiri, KUD Jaya Makmur, KUD Sumber Rezeki and KUD Sejahtera. The replanting programme proposed due financial problem of smallholder. KUD is in the process of obtaining government assistance funds for replanting.</p>	SP	KUD	Replanting Program (Ha)					2019	2020	2021	2022	2023	III	Bhakti Mandiri	562	260	158	-	-	IV	Jaya Makmur	-	298	338	284	-	V	Sumber Rezeki	-	-	266	240	-	VI	Sejahtera	-	-	-	386	314	Grand Total		562	558	762	910	314	
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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 Inti Indosawit Subur – Buatan I POM has established management review at planned term according to the scale and nature according to the SOP Nomor: AA-SOP-ES-6001-R5 dated 1 August 2020.</p> <p>Management review has conducted on 20 December 2021, attended by Group Manager, Smallholder Manager, Mill Manager, Head Assistant, Field Assistant, KTU and Sustainability Assistant. The management review has discussed:</p>	Complied																																															

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		<p>Management review has discussed the achievement of the company for example: issue related best management practises of estate including scheme smallholder and best practices both in Mil and Estate, Result of RSPO Internal Audit for Estate and Mill</p> <p>PT Inti Indosawit Subur – Buatan I POM has annual internal audit activity namely Visit Agronomy (VA) and Visit Engineering (VE).</p> <ul style="list-style-type: none"> • Report No. VA-KBN-APR-FULL-03-2022-Full Report, date of visit 13 – 15 March 2022. There were no main issues in this estate, however current issues and recommendation of immature area related to weeding control in circles/path and interrow, manuring, pest & disease, castration, supplying and consolidation. Sighted the fertilizer were noted in the lower frond axils as they were supplied too close with the palm bases and the supervisors did not carry out manuring verification. • The unit has made a corrective action plan and the issues has been closed in July 2022 <p>There was management review for Scheme Smallholder.</p> <p>Report Visit Agronomy that conducted by Coordinator of Smallholder in Plasma Buatan Group, sample seen: date 11 January 2022 based on the report there is an issue related to the loose fruit is not quoted by the farmers. The unit has made a corrective action plan and the issues has been closed in April 2022.</p>	
<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>PT Inti Indosawit Subur – Buatan I POM has demonstrated the action plan and it implementation for continuous improvement, based on consideration of the main social and environmental impact and opportunities of the unit of certification</p>	Complied

		<p>The use of Palm Pro as harvesting tools of Buatan Estate. Based on monitoring form January to May 2022, productivity kg/man days of using Palm Pro pole are increase 20% at average compared to Aluminum Pole.</p> <p>PT Inti Indosawit Subur – Buatan I POM has also established mechanism for using Palm Pro as on Operational Readiness Package (ORP) Palm Pro (AA-ORP-ESTATE-01). The document consists of Introduction; Manual of Palm Pro; Guideline for maintenance and repair; Monitoring of Palm Pro.</p> <p>To address social and environment impact assessment Ukui Estate has conducted socialization regarding Fire Fighting on 15 January 2022, the area around Ukui Estate is area with potential for land fires, so this socialization is needed.</p> <p>Action Plan Buatan I POM:</p> <ul style="list-style-type: none"> • Improve of FFA parameter according to standard • Adjust feeding POME to digester according to VFA (variation partitioning analysis), pH and TS (total solid). • Checking digester tank parameters (pH, VFA, TS) every day. <p>Action Plan Scheme Smallholder:</p> <ul style="list-style-type: none"> • Problem: Anticipating illegal FFB loaded. Action: increase supervision of Assistant and Mandor in field by performing special task, e.g., using % fruit density census, using estate format daily work plan, using fruit quality format (10 marketplace) and crosscheck hand counter at mill. Status: on going. • Percentage of FFB supply to Buatan I POM from Scheme smallholder in April 2022 is < 25%. Action taken conducted field inspection before harvesting, during harvesting and after harvesting. 	
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		<ul style="list-style-type: none"> • Maintenance of RSPO and training document. Action: updating RSPO documents, conduct training appropriate to work. • Spraying team of Plasma shall be according to sustainability standard. Action: completed spraying tools according to sustainability standard, fixing administration and working system of spraying team (TUS), established standard warehouse for agrochemical. 	
3.2.2	As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat by Certification Body during Annual Surveillance Assessment by using the RSPO metrics template.	<p>RSPO Annual Communication of Progress 2020 of PT Inti Indosawit Subur has been available in RSPO website under membership number 1-0022-06-000-00. The report has been submitted on 4 June 2020.</p> <p>PT. Inti Indosawit Subur Buatan I POM and its supply base has provided filled up/completed RSPO metrics template using the new template.</p>	Complied
Criteria 3.3: Operating procedures are appropriately documented, consistently implemented and monitored.			
3.3.1	(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.	<p>Own Estate:</p> <p>Estate has had Standard Operational Procedures (SOP) that covering entire operational activity as follows:</p> <ul style="list-style-type: none"> • SOP AA-APM-OP-1100.01-R4 dated 5 September 2016: <i>Pembibitan</i> (Nursery). • SOP AA-APM-OP-1100.02-R3 dated 10 June 2015: <i>Penanaman Areal Baru</i> (New Planting). • SOP AA-APM-OP-1100.03-R2 dated 24 July 2015: <i>Pembuatan dan Perawatan Jalan dan Jembatan</i> (Road and Bridge construction and maintenance); • SOP AA-APM-OP-1100.04-R3 dated 7 Decmeber 2015: <i>Pembuatan dan Pemeliharaan Parit</i> (Drainage Construction and Maintenance). • SOP AA-APM-OP-1100.05-R3 dated 23 November 2016: <i>Konservasi Tanah dan Air</i> (Soil & Water Conservation). • SOP AA-APM-OP-1100.06-R6 dated 16 February 2017: <i>Menanam kacang</i> (Planting cover crops). 	Complied

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		<ul style="list-style-type: none"> • SOP AA-APM-OP-1100.07-R6 dated 16 February 2017: <i>Menanam Kelapa Sawit</i> (Planting Oil Palms). • SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i> (Weed control). • SOP AA-APM-OP-1100.09. R5 dated 26 December 2018: <i>Pemupukan</i> (Fertilizer application). • SOP AA-APM-OP-1100.10. R6 dated 23 November 2016: <i>Pengendalian Hama dan Penyakit</i> (Pests & Disease Control). • SOP AA-APM-OP-1100.11. R1 dated 1 February 2009: <i>Pestisida dan Pengendaliannya</i> (Pesticide Handling). • SOP AA-APM-OP-1100.12. R3 dated 23 November 2016: <i>Kastrasi</i> (Palm castration) explain cutting all generative product (mal flower, female flower, all fruit, to support vegetative growth) – done 5-6 months before being harvested. • SOP AA-APM-OP-1100.13. R3 dated 4 March 2016: <i>Tunas Pokok</i> (Pruning). • SOP AA-APM-OP-1100.14. R3 dated 16 February 2017: <i>Sensus dan Identifikasi Pokok</i> (Census and Palm Identification). • SOP AA-APM-OP-1100.15. R2 dated 1 October 2010: <i>Sensus Produksi</i> (Production Census). • SOP AA-APM-OP-1100.16. R1 dated 1 February 2009: <i>Konsolidasi Pohon Tumbang</i> (Provision of Support to Fallen Palm). • SOP AA-APM-OP-1100.17. R1 dated 23 October 2014: <i>Pengelolaan Air</i> (Water Management). • SOP AA-APM-OP-1100.18.R3 dated 20 April 2015: <i>Potong Buah</i> (Harvesting). • SOP AA-APM-OP-1100.19.R1 dated 1 February 2009: <i>Pengelolaan Transport</i> (FFB Transport). 	
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		<ul style="list-style-type: none"> • SOP AA-APM-OP-1100.20-R6 dated 1 May 2019: <i>Peremajaan</i> (Replanting). <p>PT Inti Indosawit Subur – Buatan I POM has documented and implemented procedure related to process of FFB to become CPO and PK, starts from FFB receiving to dispatch of CPO and PK:</p> <ul style="list-style-type: none"> • SOP AA-MPM-OP-1400.02.R2 dated 1 September 2011: <i>Stasiun Penerimaan</i> for FFB Receiving Station; • SOP AA-MPM-OP-1400.03.R1 dated 1 February 2009: <i>Stasiun Rebusan</i> for Sterilizer; • SOP AA-MPM-OP-1400.04.R1 dated 1 February 2009: <i>Stasiun Pemisahan Berondolan</i> for Loose Fruit Separation; • SOP AA-MPM-OP-1400.05-R1 dated 1 February 2009: <i>Stasiun Pengadukan dan Pengempaan</i> for Pressing Station; • SOP AA-MPM-OP-1400.06-R1 dated 1 February 2009: <i>Stasiun Pemurnian</i> for Clarification; • SOP AA-MPM-OP-1400.07-R1 dated 1 February 2009: <i>Stasiun Pemisahan Nut dan Fiber</i> for Nut and Fiber Separation; • SOP AA-MPM-OP-1400.08-R1 dated 1 February 2009: <i>Stasiun Kernel</i> for Kernel Station; • SOP AA-MPM-OP-1400.09-R1 dated 1 February 2009: <i>Stasiun Boiler</i>; • SOP AA-MPM-OP-1400.10-R1 dated 1 February 2009: <i>Stasiun Engine Room</i>; • SOP AA-MPM-OP-1400.11-R1 dated 1 February 2009: <i>Stasiun Water Treatment</i>; • SOP AA-MPM-OP-1400.12-R1 dated 1 February 2009: <i>Laboratorium</i>; • SOP AA-MPM-OP-1400.13-R1 dated 1 February 2009: <i>Stasiun Pengelolaan Limbah</i> for Palm Oil Mill Effluent Treatment; 	
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- SOP AA-MPM-OP-1400.14-R2 dated 1 September 2011: *Stasiun Penimbunan dan Pengiriman CPO dan Kernel* for CPO and PK Bulking and Despatch Operation;
 - SOP AA-MPM-OP-1400.15-R1 dated 1 February 2009: *Perawatan* for Preventive Maintenance;
 - SOP AA-MPM-OP-1400.19.R2 dated 1 September 2011: *Manajemen dan Metode Menghitung Emisi Gas Rumah Kaca* (GHG)
 - SOP AA-MPM-OP-1400.18-R4 Book Keeping
 - AA-MPM-OP-1400.17-R6 Traceability
- Those documents above are available in each unit.

Scheme Smallholder:

Scheme smallholder has had best management practices procedure as follows:

- AA-PLASMA-PP-KS-01 *Pembibitan* (Nursery)
- AA-APM-OP-1100.09-R3 *Pemupukan* (Manuring) dated 20 April 2015
- AA-PLASMA-PP-KS-04 *Potong Buah* (Harvesting)
- AA-PLASMA-PP-KS-05 *Pengangkutan TBS* (FFB Transport)
- AA-APM-OP-1100.10-R5 *Pengendalian Hama dan Penyakit* (Pest and Disease Control) dated 11 January 2016
- AA-APM-OP-1100.20-R5 *Peremajaan* (Replanting) dated 4 March 2016
- AA-MM-508-1-RO *Penerimaan TBS Plasma* (FFB Plasma Receiving) 1 September 2015
- AA-MM-508-2-RO *Penentuan Taksasi TBS Plasma* (FFB Plasma Estimation)
- AA-APM-OP-1100.8-R5 *Pengendalian Gulma* (Weed Control)
- AA-FA-220-2-RO *Stempel* (Stamp)

		<ul style="list-style-type: none"> • AA-MPM-OP-1400-17-R6 <i>Ketertelusuran</i> (Traceability) dated 1 September 2017 • AA-APM-OP-1100.02-R3 <i>Penanaman Area Baru</i> (New Planting) • AA-SOP-ES-6001-R4 <i>Audit Internal Sustainability</i> (Internal Audit Sustainability) • AA-KL-12-EFP <i>Restorasi Riparian dan Areal di Sekitar Danau/Waduk dan Mata Air Lainnya</i> (Restoration of Riparian Area or Near Area of Lake/Damp or Water Sources) dated 1 August 2010 • AA-HR-305.2-RO <i>Rekrutmen dan Seleksi Karyawan</i> (Recruitment and Selection of Employee). <p>During onsite audit, auditor has conducted field visit to the Buatan Estate as follows:</p> <ul style="list-style-type: none"> • Harvesting in Buatan Estate at Block C18n Afdeling III. The implementation was good, the harvester can demonstrate the best management practices for harvesting and also safety working procedure. • Barn owl box Block C17a Afdeling III. The management unit using natural predator to control rat infestation. According to the interview, there are 5 barn owl boxes to covering 780 Ha of Afdeling III. • Chemical weeding Block A91a Afdeling I. Chemical weeding in circle and path by using herbicide with active ingredients isopropyl amine glyphosate and metil metsulfuron. The spraying activity using VVLV (very very low volume) sprayer to minimize the herbicide usage. • Replanting area Block B20f Afdeling II. Replanting using heavy vechicle, there is no fire usage. • Fertilizer application Block B20f Afdeling III. According to fertilizer recommendation, Buatan Estate conducted fertilizer application using 	
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		<p>TSP with dosage 0.6 kg/palm. The fertilizer applicator can demonstrate the application and safety working procedure.</p> <ul style="list-style-type: none"> • EFB application Block C18a Afdeling III. Unit management using EFB in immature palm to enrich the soil fertility, maintain soil moisture and reducing weeding especially in circle. EFB placing in each palm circle with dosage 27 ton/Ha or equal to 200 – 250 kg/palm. 	
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place.</p>	<p>A mechanism to check consistent implementation of procedures company has had annual internal audit activity namely Visit Agronomy (VA) and Visit Engineering (VE).</p> <p>VA Buatan Estate: Report No. VA-KBN-APR-FULL-03-2022-Full Report, date of visit 13 – 15 March 2022. There were no main issues in this estate, however current issues and recommendation of immature area related to weeding control in circles/path and interrow, manuring, pest & disease, castration, supplying and consolidation. Sighted the fertilizer were noted in the lower frond axils as they were supplied too close with the palm bases and the supervisors did not carry out manuring verification.</p> <p>VE Buatan I POM: Report Visit Engineering in April 2022. There were no main issues in this estate.</p> <p>Scheme smallholders: The Scheme smallholder has prepared mechanism to check consistent implementation of procedures is in place by android apps namely "Pembina Sejati" in Buatan Smallholder. This android apps are very useful for smallholder staff and smallholder itself to reporting the daily activity such as harvesting, upkeep and replanting.</p> <p>Based on Advisory Visit in March 2022, which states that chemical weed control is only apply in circle and path, however during field visit was found</p>	Complied

		blanket spraying in some of Kapling, and then Group Manager has a policy to prohibit blanket spraying.	
3.3.3	Records of monitoring and any actions taken are maintained and available.	<p>PT Inti Indonesawit Subur – Buatan I POM has conducted monitoring of operational activity in all levels of workers. Each field supervisor has equipped with monitoring sheets/worksheets. For example, harvesting supervisor collected harvesting record and quality of each harvester. The report submitted to estate manager daily. Therefore, daily operational activity also recorded in daily worksheet by mill supervisor before reported to the mill manager.</p> <p>To ensuring the result of operational activity in line with the procedures, mill/estate manager conducted regularly monitoring of and management review to solve the findings issues. All results of management review is implemented by respective staff.</p> <p>Data verified:</p> <ul style="list-style-type: none"> • Buatan Estate: Report No. VA-KBN-APR-FULL-03-2022-Full Report, date of visit 13 – 15 March 2022. There were no main issues in this estate, however current issues and recommendation of immature area related to weeding control in circles/path and interrow, manuring, pest & disease, castration, supplying and consolidation. Sighted the fertilizer were noted in the lower frond axils as they were supplied too close with the palm bases and the supervisors did not carry out manuring verification. <p>Action taken: “Inspeksi Pemupukan” dated 26 July 2022: described inspection of fertilizer application at Block B30, Division 1 Buatan Estate, for Urea fertilizer, dosage 1.5 kg/palm. The report mentioned palm applied, circle condition, fertilizer applied equally, application radius comply to the recommendation.</p> <ul style="list-style-type: none"> • Based on Advisory Visit in March 2022, which states that chemical weed control is only apply in circle and path, however during field visit was 	Complied

		<p>found blanket spraying in some of Kapling, and then Group Manager has a policy to prohibit blanket spraying.</p> <p>Action taken: The group manager has carried out refreshment training for smallholder members, for example: on 13 May 2022 it was held at KUD Jaya Makmur and on 17 May 2022 it was held at KUD Sejahtera.</p>	
<p>Criteria 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.</p>			
3.4.1	<p>(C) SEIA in new planting or operation including mills, is conducted independently and participatively by involving the affected stakeholders, inclusive of impact assessment from the smallholder/outgrower scheme (if any). The assessment is to be documented.</p>	<p><u>Environmental Impact Assessment (EIA):</u> Environmental impact assessment are available under documents, i.e:</p> <ul style="list-style-type: none"> • PT. Inti Indosawit Subur – Buatan POM has demonstrated a document of, tentang Studi Analisis Dampak Lingkungan (ANDAL) Perkebunan Kelapa Sawit Pola PIR-Transmigrasi dan Pabrik Minyak kelapa Sawit (PMKS) di Kabupaten Kampar, Indragiri Hulu dan Bengkalis, Propinsi Riau, mill capacity 30 tonnes FFB/hours. • PT. Inti Indosawit Subur – Buatan POM has demonstrated a document Environmental Management and Monitoring Document “Dokumen Pengelolaan dan Pemantauan Lingkungan” year 2009. The document has been approved by Governor of Riau through “Surat Keputusan Gubernur Riau No.Kpts.975/X/2009 tentang Penetapan Dokumen Pengelolaan dan Pemantauan Lingkungan Penambahan Kapasitas Produksi Pabrik Minyak Kelapa Sawit PT. Inti Indosawit Subur dan Kegiatan Pendukungnya, Sentral Workshop Buatan dan Pembuatan Laboratorium Kultur Jaringan Berlokasi di Kecamatan Pangkalan Kerinci dan Kecamatan Pelalawan, Kabupaten Pelalawan; Kecamatan Kerinci Kanan dan Kecamatan Dayun, Kabupaten Siak, Provinsi Riau” – dated 28th September 2009. Mill capacity 60 ton FFB/hour. • Kernel Crushing Plant and Biogas Plant; the EIA is available under document “UKL-UPL (Environmental Management Effort / Environmental Monitoring Effort)” year 2012. Capacity of KCP 260 	Complied

		<p>MT/day. UKL UPL has been approved by Local authorities through letter No.660/BLH-AM/2012/202 dated February 2012. Identified impacts: domestic solid waste, POME, hazardous waste, emission, dust, and noise from KC activities.</p> <ul style="list-style-type: none"> • KUD (cooperative) holds a set of copy of latest AMDAL documents in the Cooperative office, similar to company. EIA of scheme small holder has been covered by the "Dokumen Pengelolaan dan Pemantauan Lingkungan", for mill with capacity 60 tonnes FFB/hour, Own Estate 5,781 hectares, and Plasma 12,000 hectares. The EIA (DPPL) has met the applicable requirement and has been approved on 2009 through Governor Decree number Kpts.975/X/2009 dated 28th October 2009. <p>The environmental impact assessment carried out by PT. Holistika Primagrahita with team consist of: Team leader: Ir.Nur Iskandar (Fisheries/AMDAL B); Physic/Chemical team: Azni Hamzah, S.Si (Chemical/AMDAL B); Biology team: Khairunnazmi, S.Pi (Aquatic biology/AMDAL B), Marualat Harahap (Agriculture/AMDAL B); Activity: Marualat Harahap (Agriculture/AMDAL B); Social team: Yandra Mufialdo, S.Sos (Social economy); Mapping: M.Irsyadul Anwar, S.Pi</p> <p>All significant impacts have been identified i.e. reduction of soil and water quality, reduction of air quality, impact to socioeconomic of local community, etc. Plan to monitor and manage of each identified environment impact have been provided and documented. The EIA document contained evidence of involvement of surrounding community during study and public consultation with relevant stakeholder.</p> <p>The impact assessment for replanting has identified impacts such as: changes in micro climate, a decrease in air quality, increase in noise level, quantity and quality of surface water, soil erosion and sedimentation, loss</p>	
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		<p>of flora and fauna, disturbance to aquatic biota, community health and surrounding environment health.</p> <p>The document has also completed with environmental management and monitoring plan. The plans were explaining type of impact, source of impact, impact parameter, management purpose, management and monitoring plan, management/monitoring location, management/monitoring timeframe.</p> <p><u>Social Impact Assesemnt (SIA)</u></p> <p>PT Inti Indosawit Subur – Buatan POM has also shown the document of Social Impact Assessment PT Inti Indosawit Subur Kebun Buatan di Kabupaten Siak dan Kabupaten Pelalawan Propinsi Riau, in 2009 by Fakultas Kehutanan Institut Pertanian Bogor.</p> <p>Assessment of aspects of social impacts is done by several methods, including:</p> <ul style="list-style-type: none"> • Focus Group Discussion (FGD) • Deep interview • Structured Interviews <p>During preparation for Social Impact assessment team and company management have involved communities through interviews and meetings with village peoples, farmers, village officials and regency officials. Record of meeting with affected parties and stakeholder are available and can demonstrated. Evidence of participation with affected parties is to use a questionnaire conducted on 13- 19 April 2009, questionnaires can be demonstrated at the time of the audit</p>	
3.4.2	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.	PT Inti Indosawit Subur – Buatan POM has prepared the plans for management and monitoring of environmental and social impacts to avoid or reduce negative impacts and promote positive ones presented in	Complied

		<p>“Rencana Kelola Dampak Sosial dan Rencana Pemantauan Dampak Sosial year 2021 -2022”.</p> <p>The plan consisted of:</p> <ul style="list-style-type: none"> • Farmers still lack understanding regarding internal control system (ICS) - level of understanding is about 75%, management plans: conducting training programs related to understanding the ICS and RSPO. • Misunderstanding of Sorting FFB at fruit collection sites (TPH) between farmers and Mill, management plan: Socialization to farmers related to regulation of Permentan no. 14/2013 concerning the “Pelaksanaan sortasi”. • Impact of dust on the dry season caused by FFB transport activities to the mill, management: the company performs scheduled watering every day in the morning and evening. • Scheme smallholder PIR Plasma faces constraints in income generation in the face of replanting, management: coaching on other farming, cooperation in replanting and engage scheme smallholder in the work of replanting. <p>In 2022, the environmental management plan was explaining the review and evaluation upon impact from operational activity that has been performed and activity that was going to be performed.</p> <p>Evaluation upon impact from ongoing activities such as:</p> <ul style="list-style-type: none"> • Impact from main activities in oil palm plantation (spraying activity, natural vegetation conservation) • Impact from main activities in palm oil mill (utilization of palm oil mill manpower, FFB processing, palm oil mill effluent management, land application of palm oil mill effluent, application of empty fruit bunch, transport of crude palm oil, palm kernel and logistics, provision and use of clean water). • Impact from supporting activities (energy source operation, central workshop operation, temporary hazardous waste storage, landfill operation); 	
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		<p>Review and evaluation upon future activities, such as:</p> <ul style="list-style-type: none"> • Activity in tissue culture in laboratory • Replanting activity; within the replanting activity review, team has identified type of impact such as: change in micro climate, air quality decrease, increase of noise, dynamics in quantity and quality of surface water, erosion and sedimentation, decrease in terrestrial flora and fauna, disturbance in aquatic life, effect on community health. <p>The document has also completed with environmental management and monitoring plan, gives description type of impact, source of impact, impact parameter, management objective, management/monitoring plan, period of management/monitoring, PIC for management/monitoring.</p> <p>For Smallholder scheme, the type of environmental impact from their oil palm plantation such as: water pollution -> control the spraying and fertilizer application, avoid spraying near water body; soil erosion -> no blanket spraying, frond stacking, degradation on wildlife -> no hunting.</p> <p>Latest Survey was conducted on 15 to 30 March 2022 total respondent is 160 people in 8 villages in surrounding the company.</p> <p>Interview result have been summarized and recorded onto "Laporan Pelaksanaan RKL-RPL period first semester year 2022".</p>	
3.4.3	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in participatory way.</p>	<p>Review on social-environment management and monitoring has conducted year 2022.</p> <p>Latest Survey was conducted on 15 to 30 March 2022 total respondent is 160 people in 8 villages in surrounding the company.</p> <p>Interview result have been summarized and recorded onto "Laporan Pelaksanaan RKL-RPL period first semester year 2022".</p> <p>Data verified during ASA 2.1 – May 2022, i.e.:</p> <ul style="list-style-type: none"> • "Data Laporan Review Sosial Impact Assessment (SIA) Dengan Masyarakat Semester II Tahun 2021" 	Complied

		<ul style="list-style-type: none"> • “Laporan Izin Lingkungan Kegiatan Perkebunan dan Pabrik Pengolahan Kelapa Sawit PT. Inti Indosawit Subur Buatan” period second semester 2021 (July – December 2022). The report has submitted and accepted by relevant authorities through Environmental Electronic Report (SIMPEL) to Ministry of Environmental and Forestry, dated 21 January 2022. <p>PT Inti Indosawit Subur – Buatan Group has appointed the responsible person for the implementation and monitoring of EIA document is Manager (Mill, Estate and Plasma) as explained in Job Profile Manual for Manager, point 2 mentioned “Responsible on implementation of environmental permit document and monitoring each six months”.</p>	
Criteria 3.5: A system for managing human resources is in place.			
3.5.1	Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives in accordance with the applicable regulation.	<p>Buatan I POM, Estate and Scheme Smallholder:</p> <p>PT Inti Indosawit Subur – Buatan I POM has prepared a procedure for hiring workers, regulated that hiring and promotion of workers based on skill, work experiences, and job evaluation.</p> <ol style="list-style-type: none"> 1. SOP recruitment and employee selection No. SOP: AA-HR-305.2-R0 dated 1 February 2009 regarding “<i>penerimaan karyawan baru</i>” (recruitment and selection of employee), explained that: When candidates have passed in the process of selection, next recruitment sends the candidate in full data system averis into HR-it) to be made an agreement work (made 2 duplicate and should be sign by candidates in question. 2. PT Inti Indosawit Subur – Buatan I POM and Estate has issued the specific labour policy and procedures for temporary workers (PHL/PKWT); 3. SOP related to the payments No. AA-FA-219.1-R5: “Pengupahan” (Wages) dated 1 May 2016. Described in this SOP, including: <ul style="list-style-type: none"> • The use of presence card becomes a procedure of using fingerprints 	Complied

		<ul style="list-style-type: none"> • The addition of leave monitoring analysis in the PMS system • Changes in payroll procedures from direct giving to employees to transfers via banks in cooperation with companies to eliminate potentially fictitious payment characteristics <p>In the recruitment process, the company has set the standard of competence that inferred in the Position Description and Job Profile. Recruitment selection, hiring and promotion has based on skills, capabilities, qualities, and medical fitness.</p> <p>Job opportunities were communicated and given to surrounding villagers at first priority where no discrimination found observed during interview and related records of workers being employed. All workers has treated equally in accordance with company regulation including rights of worker as well. The compliance in accordance with national laws was evaluated by the organization as described in criterion 2.1. Annual performance evaluation result of worker has shown.</p> <p>Based on interview with sample of workers and labour union during ASA 2.1, they have understood related to the procedure</p>	
3.5.2	Employment procedures are implemented and records are maintained.	<p>Buatan I POM, Estate and Scheme Smallholder:</p> <p>PT Inti Indosawit Subur has established mechanism related to the employees and payments of wages, including:</p> <ol style="list-style-type: none"> 1. SOP recruitment and employee selection No. SOP: AA-HR-305.2-R0 dated 1 February 2009 regarding "<i>penerimaan karyawan baru</i>" (recruitment and selection of employee), explained that: When candidates have passed in the process of selection, next recruitment sends the candidate in full data system averis into HR-it) to be made an agreement work (made 2 duplicate and should be sign by candidates in question. 2. PT Inti Indosawit Subur – Buatan I POM and Estate has issued the specific labour policy and procedures for temporary workers 	Complied

		<p>(PHL/PKWT); The policy and procedure are issued for each unit as below:</p> <p>The policy and procedure has been communicated to workers, especially to temporary workers at Buatan I POM on 14 January 2022, while in Buatan Estate socialization conducted. The procedure was explain the detail of mechanism for temporary workers recruitment, promotion of temporary workers to be permanent workers, term and condition and requirement of temporary workers in accordance with National regulation (UU No. 13 tahun 2003).</p> <p>3. Company has established a mechanism to handle complaint from external party, as written in "<i>Mekanisme Penanganan Keluhan</i>" – complaint handling mechanism (Doc. No.SOP AA-GL- 5005-RO 01) while complaint from internal regulated under "<i>Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan</i>" – Employee' complaint and resolution mechanism (Doc. No.SOP-AA-HR-3008-RO 05).</p> <p>4. SOP related to the payments No. AA-FA-219.1-R5: "Pengupahan" (Wages) dated 1 May 2016. Described in this SOP, including:</p> <ul style="list-style-type: none"> • The use of presensi card becomes a procedure of using fingerprints • The addition of leave monitoring analysis in the PMS system • Changes in payroll procedures from direct giving to employees to transfers via banks in cooperation with companies to eliminate potentially fictitious payment characteristics. <p>Employment records are well maintained by the KTU – Buatan Estate, for example:</p> <ul style="list-style-type: none"> • Worker's promotion Buatan Estate from temporary to permanent workers, based on Memorandum No. 045/HR-RO2/MEMO/SK/XI/2021, dated 11 November 2021, on behalf of Mr. K*s*m as Harvester. 	
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		<ul style="list-style-type: none"> Employee Promotion Application Letter from PKWT (temporary) to SKU-H (permanent) on 11 March 2022 as stated by Estate Manager letter No. 43/KBN/III/2022. The letter completed with the name of the employee proposed for appointment, Assessment Results of each employee, Statement letter of each employee, Types of training that have been attended by each employee, Job, and Responsibilities of each employee at the time of appointment. Perjanjian Kerja Harian Lepas – Daily worker agreement No. 21/PKHL/KBN/III/2022 on behalf of R*sj*d dated 2 March 2022. This Daily worker agreement has made duplicate. 	
<p>Criteria 3.6: An Occupational health and safety (H&S) plan is documented, effectively communicated and implemented.</p>			
<p>3.6.1</p>	<p>(C) All operational activities risks assessed to identify the H&S issues. Mitigation plans and procedures are documented and implemented.</p>	<p>PT Inti Indosawit Subur – Buatan Group has established a health and safety policy under “Kebijakan Perusahaan”, updated 1st December 2019, was signed by Managing Director. In point 3, the company commit to implement and maintain occupational health and safety management system in compliance with national and international applicable regulation. Point 5. Integrating social, environmental, food security, occupational health and safety issues into operational activities, adopting best technology available, and maintain trained manpower, with skills, and motivated to improve performance through continuous improvement program. The policy is displayed at in public board in Buatan I POM, in each Division Office and Buatan Estate Office.</p> <p>The document of OHS Program available under “Program Manajemen K3 PMKS Buatan I PT Inti Indosawit Subur Tahun 2022”, such as:</p> <ul style="list-style-type: none"> Established the document of hazard identification, risk assesment and its control Meeting on safety committee/P2K3 (monthly basis) Report of OHS committee/P2K3 (3 months bases) Training of emergency response and preparedness (annually) 	<p>Complied</p>

		<ul style="list-style-type: none"> • Safety briefing (daily) • Providing the PPE for all employees • Inspection on PPE usage • Training for operator in POM and workshop <p>PT Inti Indosawit Subur – Buatan I POM has also prepared the procedure to identify and prepare a risk assessment. The updating risk assessment is documented on HIRAC Buatan, dated 14th February 2022. Replanting activities are also provided in the updated risk assessment. This Risk Assessment is applicable to all Cooperatives (KUD's) within the certificate scope. The risk in smallholders is more about PPE use during their activities (harvesting and fertilizing).</p> <p>Mitigation plan to reduce and minimize the risk impact has been develop by company covering:</p> <ul style="list-style-type: none"> • Elimination of risk • Substitution of material and process • Engineering control • Administrative control • Personal protective equipment. <p>Engineering control was implemented to prevent hearing loss, e.g., install noise reduction agent and administrative by erected signboard of noise area, as described in Risk.</p> <p>Administration control was performed by employee mutation/rotation, sanction for safety rules violation. Safety inspection was performed regularly to ensure the compliance of safety regulation</p> <p><u>Scheme smallholder</u></p> <p>ICS has established the policy related to EHS as per "Kebijakan Manager Group ICS", dated 2nd January 2017. In point 3 mentioned: to pay attention</p>	
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		<p>and implementing health and safety culture, using personnel protective equipment, if necessary, in performing daily work and to maintain the work premises.</p> <p>Group ICS has also demonstrated under "Program Manajemen K3 Kebun Plasma PT Inti Indosawit Subur tahun 2022, the program such as:</p> <ul style="list-style-type: none"> • Inspection and monitoring on using of PPE for harvester – daily • Training on emergency and preparedness – once a year • Training of first aider and monitoring of first aid kit • Refresh training of OHS including risk assessment. <p>Smallholders Scheme: KUD Bhakti Mandiri, KUD Jaya Makmur, KUD Sumber Rejeki, KUD Sejahtera Jaya</p> <p>Risk assessment for smallholders also updated on 5 January 2022. This Risk Assessment is applicable to all Cooperatives (KUD's) within the certificate scope. The risk in smallholders is more about PPE use during their activities (harvesting and fertilizing).</p> <p>Record of implementation the OHS program provided in indicator 3.6.2</p>	
3.6.2	(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.	<p>PT Inti Indosawit Subur – Buatan I POM has demonstrated the record of realization the OHS program 2022, such as:</p> <ul style="list-style-type: none"> • Report of MCU for all workers in Buatan I POM, was conducted by "Klinik Asian Agri Sehat Buatan", dated 22 December 2021 was attended by 43 workers. The MCU was covered urine test, HSAg and physical test. • Safety shoes was provided twice a year for all process operators including mechanic. Monitoring of PPE usage can be demonstrated on document "Monitoring Penggunaan APD" period January – June 2022 for each station. • Monitoring of emergency response and preparedness facilities, i.e: fire hydrant (8 units) and fire extinguisher (14 units), updated in March 2022, location in Buatan I POM. 	Complied

		<ul style="list-style-type: none"> • Regular emergency response drill conducted on 21 March 2022. The Fire Drill activity attended by 36 participants (workers and staff at Mill). The activity includes Fire Brigade Response, Evacuation to Assembly Point, First Aid Response and Victims Evacuation. Total duration of actual response during Fire Drill is 13 minutes. <p>PPE provision for all workers is demonstrated as per "Bukti Serah Terima Alat Pelindung Diri". Sample seen:</p> <ul style="list-style-type: none"> • PPE AP Shoes provision for fertilizer workers in Buatan Estate, dated 5 May 2022 received by 37 workers (harvester) • PPE Hand Gloves provision for fertilizer workers in Buatan Estate on 5 May 2022 received by 17 workers (sprayers team) • Checklist of availability the first aid kit, dated 2 May 2022, the result shown OK. Location in Buatan I POM <p>Based on field visit on for spraying workers in Buatan Estate and All KUD's sample during ASA 2.1 – May 2022, the risk impact probability was irritate and eyes disease, control by using appropriate PPE (eye wear/safety glasses, masker and handgloves) and regular training for sprayer workers.</p>	
<p>Criteria 3.7: All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.</p>			
3.7.1	<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>PT Inti Indosawit Subur – Buatan Group (Including Scheme smallholder) has a department which is responsible for the training program, which is the Asian Agri Learning Institute. The department has a 2022 training program recorded in the year 2022 training calendar including Estate and Mill.</p> <p>Through its employee data (master of Employees) and training data personal records, the Asian Agri Learning Institute Department will recommend the Estate and Mill to participate in a training program annually and will also evaluate the effectiveness of the training that has been followed.</p>	Complied

		<p>The training program is divided into several aspects: technical, Administration, Environments & Sustainability and special certifications and there are also training involving vendors or operational suppliers</p> <p>PT Inti Indosawit Subur – Buatan Group (Including Scheme smallholder) has shown the document of training program related to the aspects of RSPO Principles and Criteria has shown under “Program Pelatihan Karyawan PMKS Buatan Satu PT Inti Indosawit Subur – 2022”, consist of:</p> <ul style="list-style-type: none"> • Sustainability awareness – (supply chain, traceability), • Basic safety training (refreshment), • Training of basic fire (refreshment) • Training on TPM (Total productive maintenance), • Training of work instruction (WI) – refreshment, • Training on preparedness and emergency response, • Awareness training of RSPO PnC for smallholder member • Training of HCV Z(refreshment) • Training for first aider • Training on handling of limited pesticide for operator sprayer (TUS) • Training of fertilizer application <p>The implementation of training program available in indicator 3.7.2</p>	
3.7.2	Records of training are maintained, where appropriate on an individual basis.	<p>Document of training record has demonstrated – year 2021 and 2022, such as:</p> <ul style="list-style-type: none"> • Refreshment training of RSPO requirement include P&C and SCCS dated 16 March 2022 – was attended by 13 workers • Training of refresh SOP for pest and disease control, implemented on 4 April 2022 and attended by 41 participants. • Refreshment training for smallholder members, for example: on 13 May 2022 it was held at KUD Jaya Makmur and on 17 May 2022 it was held at KUD Sejahtera 	Complied

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		<ul style="list-style-type: none"> • Technical road maintenance training, conducted on 5 February 2022 and attended by 22 participants. • Regular emergency response drill conducted on 16 March 2022. The Fire Drill activity attended by 32 participants (workers and staff at Mill). The activity includes Fire Brigade Response, Evacuation to Assembly Point, First Aid Response and Victims Evacuation. Total duration of actual response during Fire Drill is 13 minutes. • Refreshment training of PPE usage for harvester dated 15 January 2022, 25 March 2022. • Training of refresh SOP for pest and disease control, implemented on 4 April 2022 <p>Record training for individual basis has also maintained during ASA 2.1, such as:</p> <p>W*t*m*h (spraying applicator), consist of:</p> <ul style="list-style-type: none"> • Training on limited pesticide handling (26 September 2016), • Refresh training on chemical/pesticides handling (18 May 2017), • Refresh training on chemical/pesticides handling (28 June 2018), • Refreshment training for OHS, HCV and basic fire (dated 30 January 2020) • Training of refresh SOP for pest and disease control, implemented on 4 April 2022 • Regular emergency response drill conducted on 16 March 2022 <p>N*sn*r (dispatch operator) consisted of:</p> <ul style="list-style-type: none"> • Training SOP Mass Balance and SOP Traceability (dated 15 May 2019) • Training Traceability and Mass Balance (dated 8 May 2018) • Refreshment training of RSPO requirement include PnC and SCCS (dated 10 February 2020) • Regular emergency response drill conducted on 16 March 2022 <p>G*n*w*t* (weighbridge operator) participated in training:</p>	
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		<ul style="list-style-type: none"> • Refreshing SOP Mass Balance and SOP Traceability (dated 29 November 2016) • Refreshing SOP Mass Balance and SOP Traceability (dated 19 May 2017) • Refreshment training of RSPO requirement include PnC and SCCS (dated 10 February 2020) • Training Traceability and Mass Balance (dated 8 May 2021) • Regular emergency response drill conducted on 16 March 2022 <p>Mr. W*id (foreman for spraying), record of training:</p> <ul style="list-style-type: none"> • Training of Integrated Pest Control (dated 10 April 2018) • Training of Use First aid box for accidents (P3K) (dated 6 December 2018) • Trraining of implementation of communication, social grievance (4 December 2018) • Refreshment training for OHS, HCV and basic fire (dated 30 January 2020) • Training of refresh SOP for pest and disease control, implemented on 4 April 2022 • Regular emergency response drill conducted on 16 March 2022 <p>Mr. N*Iw*n (operator machine room), record of training:</p> <ul style="list-style-type: none"> • Socialization of PKB (dated 22 November 2018) • Training of Use First aid box for accidents (P3K) (dated 10 December 2018) • Training of operator Genset (dated 8 April 2019) • Regular emergency response drill conducted on 16 March 2022 	
3.7.3	Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain	SCCS Training has been carried out on 15 December 2021 by head office Jakarta (Welly Joel) through zoom meeting.	Complied

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	<p>Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.</p>	<p>Evidence of training can be demonstrated during audit such as attendance list, training material and photo documentation.</p> <p>During interview with weighbridge Clerk, mill manager, dispatch operator and KTU (head of administration) confirmed that she has understanding on RSPO supply chain.</p>	
<p>Criteria 3.8: Supply chain requirements for mills. Procedure note: all requirements are classified as Critical Indicators. However it will not contribute to suspension if there is more than 5 non-compliance within a principle)</p>			
<p>3.8.1</p>	<p>Identity Preserved Module</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.</p> <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.</p>	<p>PT Inti Indosawit Subur – Buatan I POM implements RSPO Supply Chain model Mass Balance.</p> <p>Not applicable.</p>	<p>Not Applicable</p>
<p>3.8.2</p>	<p>Mass Balance Module</p> <p>A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	<p>PT. Inti Indosawit Subur – Buatan I POM holds current RSPO P&C Certificate No. RSPO 638918, first certification start on 16 September 2010 and current certificate is issued on 24/08/2021 and expired on 23/08/2026. PT. Inti Indosawit Subur – Buatan I POM uses Mass Balance supply chain model. The mill only claimed the FFB proportion from certified supply bases which comprise of company-own estate (Buatan Estate) and 4 scheme Smallholder in form of cooperative/Koperasi Unit Desa (KUD). The proportion of non-certified FFB comes from third-party supplier (7 Supplier: CV Putra Kembar Sentosa (PBD-R), CV Maju Bersama, Sudiyono, CV PNR, Dharma Putera, CV SAM PNR, Sawit Jaya Mandiri, Berkah Makmur Bersama.</p>	<p>Complied</p>

		FFB Non certified approximately 72% from total FFB received by Buatan I POM.	
3.8.3	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>The estimated tonnage of certified CPO and PK that could potentially produced by PT. Inti Indosawit Subur – Buatan I POM its recorded in RSPO Public Summary report, certificate and RSPO IT Paltform.</p> <p>The mill has met registration and reporting requirement as it registered in RSPO IT Platform (PalmTrace) with ID number RSPO_PO1000000345.</p> <p>Below are the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year 2021:</p> <p><u>Forecast volume (Sept 2021 – Aug 2022)</u> FFB : 106,427 MT CPO : 20,284 MT (OER: 19.06%) PK : 5,694 (KER: 5.35%)</p> <p><u>Actual production volume (Sept 2021 – May 2022)</u> FFB: 43,659.01 MT CPO: 8,034.23 PK: 2,288.42 MT</p> <p><u>Actual sold volume (Sept 2021 – May 2022)</u> CPO: 0 MT, All volume Sold as ISCC PK: 2,137.16 MT</p>	Complied
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	<p>PT. Inti Indosawit Subur – Buatan I POM is subsidiary of PT. Inti Indosawit Subur, a member of RSPO, with RSPO membership No.1-0022-06-000-00 since 6 February 2006.</p> <p>PT Inti Indosawit Subur – Buatan I POM has meet all registration and reporting requirements.</p> <p>RSPO IT Platform/PalmTrace account RSPO_PO1000000021.</p>	Complied

<p>3.8.5</p>	<p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill's procedures for the implementation of this standard. d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill. 	<p>PT. Inti Indosawit Subur – Buatan I POM can demonstrate procedures as follow:</p> <ul style="list-style-type: none"> • Standard Operating Procedures – Traceability (AA-MPM-OP-1400.17.R7) dated 1 October 2019. The procedures cover traceability of CPO and PK, since FFB receiving from Buatan Estate and Smallholder, processing up to shipping of CPO and PK as well as daily production report. The procedure also regulates the internal audit by Sustainability Internal Audit Manager. Traceability records are to be kept for 10 years. • Standard Operating Procedure – Book Keeping (AA-MPM-OP-1400.18-R4). The procedure explains method to check only certified product received. The book keeping mass balance stated every 3 months: January-March, April-June, July-September, and October-December each year. Head of Environment and Sustainability will inform to Certification Body in the case of projected overproduction. • SOP for mill operation Mill Policy Manual: <ul style="list-style-type: none"> - SOP AA-MPM-OP-1400.02.R2 Stasiun Penerimaan for FFB receiving station; - SOP AA-SOP-OP-101.5-R0 Grading; - SOP AA-MPM-OP-1400.03.R1 Stasiun Rebusan for sterilizer; - SOP AA-MPM-OP-1400.04.R1 Stasiun Pemisahan Berondolan for loose fruit separation; - SOP AA-MPM-OP-1400.05-R1 Stasiun Pengadukan dan Pengempaan for pressing station; - SOP AA-MPM-OP-1400.06-R1 Stasiun Pemurnian for clarification; - SOP AA-MPM-OP-1400.07-R1 Stasiun Pemisahan Nut dan Fiber for nut and fiber separation; - SOP AA-MPM-OP-1400.08-R1 Stasiun Kernel for kernel station; - SOP AA-MPM-OP-1400.09-R1 Stasiun Boiler; 	<p>Complied</p>
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		<ul style="list-style-type: none"> - SOP AA-MPM-OP-1400.10-R1 Stasiun Engine Room; - SOP AA-MPM-OP-1400.11-R1 Stasiun Water Treatment; - SOP AA-MPM-OP-1400.12-R1 Laboratorium; - SOP AA-MPM-OP-1400.13-R1 Stasiun Pengelolaan Limbah for palm oil mill effluent treatment; - SOP AA-MPM-OP-1400.14-R2 Stasiun Penimbunan dan Pengiriman CPO dan Kernel for CPO and PK bulking and despatch operation; - SOP AA-MPM-OP-1400.15-R1 Perawatan for preventive maintenance; - SOP AA-MPM-OP-1400.18-R4 Book Keeping - SOP AA-MPM-OP-1400.17-R7 Traceability <p>PT. Inti Indosawit Subur – Buatan I 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 Manager. During audit, the mill manager is able to demonstrate sufficient knowledge and understanding on RSPO supply chain implementation for palm oil mill.</p> <p>PT Inti Indosawit Subur Buatan I POM has a procedures for receiving and processing certified and non-certified FFBS including ensuring no contamination in the IP mill, as described in SOP AA-MPM-OP-1400.17-R7 Traceability, dated 1 October 2019.</p>	
3.8.6	<p>Internal Audit</p> <p>iii) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill;</p>	<p>PT. Inti Indosawit Subur – Buatan I POM has a procedure to conduct internal audit RSPO, including RSPO SCCS as per Procedure of Traceability (AA-MPM-OP-1400.17-R7) chapter 6.7, Sustainability Internal Audit Manager conducted internal audit annually, to ensure all operational and documentation activities are comply with the requirement in RSPO Supply Chain Certification Standard and the RSPO Market Communications and</p>	Complied

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	<ul style="list-style-type: none"> iv) Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. v) Effectively implements and maintains the standard requirements within its organisation. vi) 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>Claims Documents. Internal audit for all scheme including RSPO SCCS also refer to SOP Internal Audit Nomor: AA-SOP-ES-6001-R5 dated 1 August 2020; Chapter 4.0 stated that Internal audit conducted minimum once a year considering the critical area.</p> <p>Internal audit SCCS was conducted on 9 – 14 May 2022 by Hendryk Simanjuntak. Internal audit report were evident, all issue raised during internal audit has been followed up by Corrective Action. According to internal audit result there is no issue regarding SCCS.</p> <p>Management review conducted once a year as per SOP Internal Audit Nomor: AA-SOP-ES-6001-R5 dated 1 August 2020. Management review has been conducted on 26 May 2022. Input of management review consist of:</p> <ul style="list-style-type: none"> - Internal audit result - Customer feedback - Proses performance and product conformity - Status of Corrective and Preventive Action - Follow up previous management review - Change that could effect to the management system <p>Output of management review has include:</p> <ul style="list-style-type: none"> - Recommendation for improvement - Resources needed. 	
3.8.7	<p>Purchasing and Goods In</p> <ul style="list-style-type: none"> i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received. ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage. iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents. 	<p>PT Inti Indosawit Subur – Buatan I POM has demonstrated SOP of Traceability (AA-MPM-OP-1400.7.R7), chapter 5.1 indicates the Weighbridge Clerk has responsibility to input data and print weighbridge card based on “Surat Pengantar TBS”, covering information e.g. estate name and block number, mill name, date of delivery, product description and quantity, RSPO certificate number, transporter identity and unique identification number.</p>	Complied

		<p>PT. Inti Indosawit Subur – Buatan I POM receive FFB from certified and non-certified source. Certified source consist of own estate (Buatan Estate) and 4 scheme Smallholder in form of cooperative/Koperasi Unit Desa (KUD). The proportion of Non-certified FFB comes from third-party supplier (5 Supplier: CV Putra Kembar Sentosa (PBS-A), CV Maju Bersama, Ilham, Sudiyono, Narimin).</p> <p>Document “Surat Pengantar TBS” (FFB Delivery Note) and Kartu Timbangan (Weighbridge Card) described identity and location of FFB source and other item required e.g.</p> <p>Certified FFB:</p> <ul style="list-style-type: none"> - FFB delivery “Surat Pengantar TBS Buatan Estate No.10030” from Division VIII, block A17C dated 22 April 2022 – total 841 bunches. Weighbridge ticket “Tiket Timbangan No.PBSA121200224” dated 22 April 2022, for 841 FFB bunches; nett weight 5,860 kg; from Buatan Estate, Division VIII, block A17c; vehicle BM9934TB; RSPO certificate No.RSPO638918. - FFB delivery “Surat Pengantar Buah (SPB) No.422” from KT 53 Suka Jaya KUD Bhakti Mandiri, dated 17 February 2022 – total 252 bunches. Weighbridge ticket “Tiket Timbangan No.PBSA222201027” dated 17 February 2022, for 252 FFB bunches; nett weight 6,094 kg; from KT 53 Suka Jaya; Block B01015; vehicle No. BM8015SC; Driver: Toni; RSPO certificate No.RSPO638918. - FFB delivery “Surat Pengantar Buah (SPB) No. 423” From Kelompok Tani 98 Makarti Tama, KUD Jaya Makmur” dated 17/02/2022 - total 145 bunches. Weighbridge ticket “Tiket Timbangan No.PBSA222201028” dated 17 February 2022, for 145 FFB bunches; nett weight 3,742 kg; from KT 98 – Makarti Tama; Block B05011 vehicle No. BM9089CH, Driver: Anhar; RSPO certificate No.RSPO638918. - FFB delivery “Surat Pengantar Buah (SPB) No. 418” From Kelompok Tani 101 Sido Makmur, KUD Sumber Rezeki” dated 17/02/2022 - total 127 	
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		<p>bunches. Weighbridge ticket "Tiket Timbangan No.PBSA222201023" dated 17 February 2022, for 127 FFB bunches; nett weight 3,605 kg; from KT 101 – Sido Makmur; Block B11012 vehicle No. BM9173CF, Driver: Lilik; RSPO certificate No.RSPO638918.</p> <ul style="list-style-type: none"> - FFB delivery "Surat Pengantar Buah (SPB) No. 411" From Kelompok Tani 171 Gelatik, KUD Sejahtera" dated 17/02/2022 - total 279 bunches. Weighbridge ticket "Tiket Timbangan No.PBSA222201016" dated 17 February 2022, for 279 FFB bunches; nett weight 6,094 kg; from KT 171 – Gelatik; Block B10019 vehicle No. BM9950CB, Driver: Buyung; RSPO certificate No.RSPO638918. <p>Non-certified FFB:</p> <ul style="list-style-type: none"> - FFB delivery note: "Surat Pengantar TBS", No. 03070 dated 27/05/2022 From CV Maju Bersama, vehicle code BM9016DL; driver Ngapilon; Weighbridge ticket "Tiket Timbangan No.PBSA522205665" dated 27/05/2022, for 602 FFB bunches; nett weight 9,636 kg; FFB source from non-certified third party FFB supplier CV Maju Bersama, ID A156; vehicle BM9016DL, Driver Ngapilon. - FFB delivery note: "Surat Pengantar TBS", No. 03667 dated 27/05/2022 From CV Putra Naiko Raja Sonang, vehicle code BM8483SE; driver Adi; Weighbridge ticket "Tiket Timbangan No.PBSA522205678" dated 27/05/2022, for 577 FFB bunches; nett weight 11,544 kg; FFB source from non-certified third party FFB supplier CV Putra Naiko Raja Sonang, ID A199; vehicle BM8483SE, Driver Adi. - FFB delivery note: "Surat Pengantar TBS", No. 03790 dated 17/02/2022 From CV Mandiri Sentosa, vehicle code BM8684XU; driver Mamad; Weighbridge ticket "Tiket Timbangan No.PBSA522201547" dated 17/02/2022, for 971 FFB bunches; nett weight 17,486 kg; FFB source from non-certified third party FFB supplier CV Mandiri Sentosa, ID A008; vehicle BH8684XU, Driver Mamad. 	
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		<ul style="list-style-type: none"> - FFB delivery note: "Surat Pengantar TBS", No. 05941 dated 14/02/2022 From CV Putra Kembar Sentosa, vehicle code BM8224SH; driver Heri; Weighbridge ticket "Tiket Timbangan No.PBSA521214192" dated 14/02/2022, for 540 FFB bunches; nett weight 8,102 kg; FFB source from non-certified third party FFB supplier CV Putra Kembar Sentosa, ID A152; vehicle BM8224SH, Driver Heri. 	
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"> a) The name and address of the buyer; b) The name and address of the seller; c) The loading or shipment / delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation; i) A unique identification number. 	<p>During 2021 – 2022 there is no CPO sold as RSPO certified. All certified CPO sold as ISCC certified. PK certified RSPO was deliver to own Kernel Crushing Plant namely Buatan I Kernel Crushing Plant. The PK certified delivery was completed with Delivery Form.</p> <p>Sample seen of delivery form CSPK from Buatan I POM to Buatan I KCP:</p> <ul style="list-style-type: none"> - Delivery Form No. KCP PBS 1003 SS dated 31 March 2022, From PT Inti Indosawit Subur – Buatan I POM to PT Inti Indosawit Subur – KCP Buatan I, Commodity: RSPO Certified Palm Kernel, Supply Chain model: Mass Balance, certificate number: RSPO638918, quantity 306,230 kg, transport by Fan/Pipe. - Delivery Form No. KCP PBS 1005 SS dated 15 May 2020, From PT Inti Indosawit Subur – Buatan I POM to PT Inti Indosawit Subur – KCP Buatan I, Commodity: RSPO Certified Palm Kernel, Supply Chain model: Mass Balance, certificate number: RSPO638918, quantity 162,500 kg, transport by Fan/Pipe. - Delivery Form No. KCP PBS 1004 SS dated 30 April 2022, From PT Inti Indosawit Subur – Buatan I POM to PT Inti Indosawit Subur – KCP Buatan I, Commodity: RSPO Certified Palm Kernel, Supply Chain model: Mass Balance, certificate number: RSPO638918, quantity 171,870 kg, transport by Fan/Pipe. - Delivery Form No. KCP PBS 1005 SS dated 31 May 2022, From PT Inti Indosawit Subur – Buatan I POM to PT Inti Indosawit Subur – KCP Buatan I, Commodity: RSPO Certified Palm Kernel, Supply Chain model: Mass Balance, certificate number: RSPO638918, quantity 337,750 kg, 	Complied

		<p>transport by Fan/Pipe.</p> <p>The information contain in the document are complete and can be presented either on a single document or across a range of documents.</p>	
3.8.9	<p>Outsourcing Activities</p> <p>ii) 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>iii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</p>	<p>PT. Inti Indosawit Subur – Buatan I POM not outsource its milling activities however operate subcontractor for CPO and PK transporter. The appointed outsourced company is PT. Wijaya Multi Prima Lestari, CV Trans Cargo Logistik, PT Buana Jaya Bersama and CV Teman Setia.</p> <p>PT. Inti Indosawit Subur – Buatan I POM having legal ownership of material being transported by appointed outsourced companies: PT. Wijaya Multi Prima Lestari, CV Trans Cargo Logistik, PT Buana Jaya Bersama and CV Teman Setia.</p> <p>PT. Inti Indosawit Subur – Buatan I POM have a contract agreement with transporter as below:</p> <ul style="list-style-type: none"> - "Perjanjian Pengangkutan Nomor: 05/VI/W MPL-IIS/2020" dated 4 June 2020 between PT Inti Indosawit Subur – Buatan I POM and PT Wijaya Multi Prima Lestari. Contract transport for CPO & PK. - "Perjanjian Pengangkutan Nomor: 01/VI/TCL-IIS/2022" dated 6 June 2022 between PT Inti Indosawit Subur – Buatan I POM and CV Trans Cargo Logistik. Contract transport for CPO & PK. - "Perjanjian Pengangkutan Nomor: 08/VI/TS-IIS/2020" dated 4 June 2020 between PT Inti Indosawit Subur – Buatan I POM and CV Teman Setia. Contract transport for CPO & PK. - "Perjanjian Pengangkutan Nomor: 06/VI/BJB-IIS/2020" dated 4 June 2020 between PT Inti Indosawit Subur – Buatan I POM and PT Buana Jaya Bersama. Contract transport for CPO & PK. <p>Contract agreement are signed and enforceable by both parties. According to contract agreement article 7 point 1.k stated that "Transporter bersedia memenuhi persyaratan system sertifikasi rantai pasok saat pengangkutan bahan baku dan bersedia untuk diaudit oleh auditor internal perusahaan</p>	Complied

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		<p>dan auditor pihak eksternal dari badan sertifikasi yang ditunjuk oleh pihak kedua jika diperlukan” – Transporter are willing to comply with certification system of RSPO Supply Chain during transport material and willing to be audit by internal auditor company (PT Inti Indosawit Subur – Buatan I POM) and external auditor from Certification Body if necessary.</p> <p>PT Inti Indosawit Subur Buatan I POM has a procedure to control the outsourced transporter through “SOP Traceability AA-MPM-OP-1400.17-R7 dated 1 October 2019”</p> <p>Internal control for CPO and PK delivery by contractor has made as well with:</p> <ul style="list-style-type: none"> • Surat Izin Muat CPO dan Kernel, contain information of Driver name, Identity number, Car/Truck Number, CPO/PK Dispatch time, netto, incoming and outgoing time. • Delivery Order Slip from Transporter, contain information of sales contract number, Truck number, destination, driver name, port destination. • Daftar Periksa Kesiapan Pengiriman CPO/Kernel contain information of Truck number, driver name, date of inspection, item inspection including: driver identity and completeness of vehicle legality, completeness of physical standard of vehicle, number of seal. <p>Since January – December 2021 and January – May 2022 there is no CPO certified RSPO delivery by Buatan I POM. CPO delivery as ISCC certified</p> <p>During onsite audit confirmed that control for CPO and PK delivery has well implemented by Buatan I Palm Oil Mill. Interview with CPO and PK transporter from PT Wijaya Multi Prima Lestari and CV Trans Cargo Logistik indicated that they have aware and controled by PT Inti Indosawit Subur – Buatan I POM.</p> <ul style="list-style-type: none"> • Interview with transporter PT Wijaya Multi Premier Lestari (operation director) conducted on 11 June 2022, it was confirmed that the transporter are aware regarding the requirement of RSPO supply chain 	
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		during transport. Handling during transport are well control, before loading – during transport – unloading was monitor by supervisor. Tank transport are cleaning before loading and after unloading. GPS are installed in each tank truck to monitor during transport until reach the destination.																					
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	<p>PT Inti Indosawit Subur – Buatan I POM has recorded name and contact detail of all contractors, as follows:</p> <table border="1"> <thead> <tr> <th>Name of Transporter</th> <th>Address</th> <th>Contact Person</th> <th>Phone Number</th> </tr> </thead> <tbody> <tr> <td>PT Wijaya Multi Prima Lestari</td> <td>Jl. Siak II No. 171, Provinsi Riau</td> <td>Ny. Leni</td> <td>0811708***</td> </tr> <tr> <td>CV Trans Cargo Logistik</td> <td>Jl. Soekarno Hatta Kampung malibu E7, Kota Pekanbaru</td> <td>Ny. Mira</td> <td>0811655***</td> </tr> <tr> <td>PT Buana Jaya Bersama</td> <td>Jl. Siak II RT 02 RW03, Kec. Payung Sekaki, Kel. Bandar Raya, Pekanbaru, Riau</td> <td>Diana</td> <td>082169511*** / 082170430***</td> </tr> <tr> <td>CV Teman Setia</td> <td>Jl. Jenderal Sudirman Dusun VI Kel. Sidomulyo, Kec. Pulo Bandring, Kisaran.</td> <td>Rudy Hartono Salimn</td> <td>0852755***</td> </tr> </tbody> </table>	Name of Transporter	Address	Contact Person	Phone Number	PT Wijaya Multi Prima Lestari	Jl. Siak II No. 171, Provinsi Riau	Ny. Leni	0811708***	CV Trans Cargo Logistik	Jl. Soekarno Hatta Kampung malibu E7, Kota Pekanbaru	Ny. Mira	0811655***	PT Buana Jaya Bersama	Jl. Siak II RT 02 RW03, Kec. Payung Sekaki, Kel. Bandar Raya, Pekanbaru, Riau	Diana	082169511*** / 082170430***	CV Teman Setia	Jl. Jenderal Sudirman Dusun VI Kel. Sidomulyo, Kec. Pulo Bandring, Kisaran.	Rudy Hartono Salimn	0852755***	Complied
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3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	The site committed to inform CB related name and contact details of any new contractors as mentioned in Procedure "SOP Traceability AA-MPM-OP-1400.17-R7 dated 1 October 2019".	Complied																				

		PT Inti Indosawit Subur – Buatan I POM informed the CB prior the audit through pre information audit checklist.	
3.8.12	<p>Record keeping</p> <ul style="list-style-type: none"> i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements. ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock. iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis. iv) For Mass Balance Module, the mill: <ul style="list-style-type: none"> 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. 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. 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>The organization has maintained accurate, complete, up-to-date and accessible records and reports covering all aspects of RSPO Supply Chain requirements, as evident in:</p> <ul style="list-style-type: none"> - FFB delivery note - Weigbridge ticket for FFB receiving, CPO and PK delivery - Delivery Order - Sales contract - Shipping Announcement - Mass balance report - Internal audit RSPO SCCS and Management review <p>The procedure of Traceability (AA-MPM-OP-1400.7.R7), requires that all records and reports related to traceability and book keeping are retained for a period of 10 years.</p> <p>All receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK are record and balance in a three-monthly basis, as evidence in "Mass Balance Report Buatan I POM" period 2021/2022: January – March, April – June, July – September, October – December, January – March, April – ytd June.</p> <p>All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios/actual production of CPO and PK.</p> <p>According to Mass balance Report, Buatan I POM only deliver Mass Balance sales from a positive stock.</p>	Complied

<p>3.8.13</p>	<p>Extraction Rate The oil extraction rate (OER) and the kernel extraction rate(KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	<p>The organization is able to provided estimate volume of CPO and PK in a year period as in Budget FY 2021/2022 Production FFB, CPO and PK. The organization also keep an up to date record of the FFB volume received, CPO and PK produced over a period of twelve (12) month, as in Rekapitulasi Produksi TBS, CPO dan PK PT Inti Indosawit Subur – Buatan I POM. OER and KER are estimated based on associated inputs and upon past experience (previous year FFB, CPO and PK production). The site has set OER for budget 2022 (Jan - Dec) as 18.53% and KER as 5.05%. Budget FFB process 2022: certified 52,748.43 MT, non certified: 235,000 MT Budget CPO production 2022: certified 10,022.20 MT, non certified 44,649.99 MT. Budget PK production 2022: certified 2,848.42 MT, non certified 12,690.00 MT. Previous Budget vs realization on 2021 (Jan – Dec) as below:</p> <table border="1" data-bbox="1064 943 1904 1383"> <thead> <tr> <th>Description</th> <th>Budget</th> <th>Realization</th> </tr> </thead> <tbody> <tr> <td>FFB Certified</td> <td>98,599.81</td> <td>61,929.58</td> </tr> <tr> <td>FFB Non Certified</td> <td>189,164.77</td> <td>156,466.08</td> </tr> <tr> <td>CPO Certified</td> <td>18,565.32</td> <td>11,394.67</td> </tr> <tr> <td>CPO Non Certified</td> <td>37,213.20</td> <td>29,014.05</td> </tr> <tr> <td>PK Certified</td> <td>5,275.09</td> <td>3,029.12</td> </tr> <tr> <td>PK Non Certified</td> <td>10,120.32</td> <td>7,774.69</td> </tr> <tr> <td>OER</td> <td>18.64</td> <td>18.50</td> </tr> <tr> <td>KER</td> <td>5.35</td> <td>4.95</td> </tr> </tbody> </table>	Description	Budget	Realization	FFB Certified	98,599.81	61,929.58	FFB Non Certified	189,164.77	156,466.08	CPO Certified	18,565.32	11,394.67	CPO Non Certified	37,213.20	29,014.05	PK Certified	5,275.09	3,029.12	PK Non Certified	10,120.32	7,774.69	OER	18.64	18.50	KER	5.35	4.95	<p>Complied</p>
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3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	<p>The actual conversion ratio is monitored on daily basis through sounding result and documented in daily report. PT. Inti Indosawit Subur – Buatan I POM is able to demonstrate the work instruction for analysis of oil content. Sample seen on document of “Laporan Harian Produksi”. Based on Laporan Harian Produksi dated 31 May 2022, the sounding result and production report shows that actual conversion ratios from FFB into CPO are:</p> <ul style="list-style-type: none"> a. OER For FFB from Buatan Estate: 19.00% b. OER For FFB from Buatan Plasma: 19.00% c. OER For FFB from third-party: 19.00% d. OER Average 19.00% <p>And actual conversion ratios from FFB into PK are:</p> <ul style="list-style-type: none"> a. KER For FFB from Buatan Estate: 18.88% b. KER For FFB from Buatan Plasma: 17.50% c. KER For FFB from third-party: 4.15% d. OER average 17.69% 	Complied												
3.8.15	<p>Processing</p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	Not applicable. PT Inti Indosawit Subur – Buatan I POM implementing Mass Balance Model for Supply Chain.	Not Applicable												
3.8.16	<p>Registration of Transactions</p> <p>iii) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p>	<p>PT. Inti Indosawit Subur – Buatan I POM has made shipping announcement inside PalmTrace transaction, sample seen for period June 2021 – May 2022:</p> <table border="1" data-bbox="1064 1278 1939 1378"> <thead> <tr> <th>Transaction ID</th> <th>Buyer</th> <th>Product</th> <th>Supply Chain Model</th> <th>Volume</th> <th>Status</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Transaction ID	Buyer	Product	Supply Chain Model	Volume	Status							Complied
Transaction ID	Buyer	Product	Supply Chain Model	Volume	Status										

	iv) 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.	TR-0dcda5da-ef65	Buatan I KCP	CSPK	MB	666.85	Confirmed	
		TR-0c8148e8-a19a	Buatan I KCP	CSPK	MB	245.1	Confirmed	
		TR-c4883af8-f9f1	Buatan I KCP	CSPK	MB	438.48	Confirmed	
		TR-b985a5f2-6219	Buatan I KCP	CSPK	MB	99.2	Confirmed	
		TR-459091f9-55a6	Buatan I KCP	CSPK	MB	196.64	Confirmed	
		TR-c7413cb0-be57	Buatan I KCP	CSPK	MB	261.27	Confirmed	
		PT. Inti Indosawit Subur – Buatan I POM has made remove RSPO certified CSPO from their PalmTrace account with volume remove: 13,147.61 MT CSPO; Stock removed for CSPO sold as ISCC certified. The evidence of remove transaction can be demonstrated on the palmtrace transaction with transaction ID: ST-TR-44774a03-d5e9, remove date: 31/05/2022.						
3.8.17	Claims 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.	PT. Inti Indosawit Subur – Buatan I POM has not made claims regarding the support of RSPO certified oil palm products. However the organization aware about the RSPO Rules on Market Communications and Claims.						Complied
General corporate communications								
4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	PT. Inti Indosawit Subur (with the brand Asian Agri), the parent company of Buatan I POM is highlighting its commitment to the principles of RSPO, and directly referring to RSPO website. The corporate communication can be found at http://www.asianagri.com .						Complied
4.2	In corporate communications a member is allowed to:	PT. Inti Indosawit Subur (with the brand Asian Agri), in its website:						Complied

	<ul style="list-style-type: none"> • Display its RSPO membership status • Display the RSPO web address (www.rspo.org) • State that the member supports the work of the RSPO • State the member’s history with regard to the RSPO. • Use the RSPO trademark to promote its membership of the RSPO. <p>Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text ‘Check our progress at www.rspo.org’ where the link must lead to the member’s profile page.</p>	<p>a. Display its RSPO membership status: No, PT. Inti Indosawit Subur (with the brand Asian Agri), did not display its RSPO membership status. The CH only stated “In 2006, became a member of the Roundtable of Sustainable Palm Oil. We received out first RSPO certification for our estate in 2010.”</p> <p>b. Display the RSPO web address: Not in direct manner. PT. Inti Indosawit Subur (with the brand Asian Agri), made a link to RSPO website.</p> <p>c. State the member supports the work of the RSPO: Not in direct manner. In the website, PT. Inti Indosawit Subur (with the brand Asian Agri), “In 2006, became a member of the Roundtable of Sustainable Palm Oil. We received out first RSPO certification for our estate in 2010.”</p> <p>d. State the member’s history with regards to the RSPO: Not in direct manner. In the website, In the website, PT. Inti Indosawit Subur (with the brand Asian Agri), “In 2006, became a member of the Roundtable of Sustainable Palm Oil. We received out first RSPO certification for our estate in 2010, and in 2012, the certificatoin for our smallholder scheme.”</p> <p>e. Use of RSPO Trademark to promote its membership of the RSPO: No, PT. Inti Indosawit Subur (with the brand Asian Agri), did not use RSPO trademark in its corporate communication such in website.</p>	
4.3	<p>In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.</p>	<p>No, PT. Inti Indosawit Subur (with the brand Asian Agri), did not display its RSPO membership status.</p> <p>It is clear that the statement did not lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.</p>	Not Applicable
4.4	<p>Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member’s own products.</p>	<p>No, PT. Inti Indosawit Subur (with the brand Asian Agri), did not display its RSPO membership status.</p> <p>It is clear that the statement are clear and did not mislead consumers or other stakeholders as to the certified content of oil palm products in the PT. Inti Indosawit Subur – Buatan I POM own products.</p>	Not Applicable

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4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	No, PT. Inti Indosawit Subur (with the brand Asian Agri) did not display its RSPO Corporate Logo in any document.	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.	There was no use of RSPO trademark and/or RSPO corporate logo in business to business communication related to RSPO certified product; between PT. Inti Indosawit Subur – Buatan I POM and their buyers.	Not Applicable
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	When confirming the sale of certified oil palm products, PT. Inti Indosawit Subur – Buatan I POM followed the requirements of the RSPO SCCS. PT. Inti Indosawit Subur –Buatan I POM stating the supply chain model and certificate number under which the claim is being made.	Not Applicable
5.3	Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options: a) If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer’s SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation. b) If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.	PT. Inti Indosawit Subur – Buatan I POM is not a distributor and/or wholesaler. Not applicable.	Not Applicable
5.4	A certified member can provide information to its customers detailing the presence of certified palm oil contained within a	PT. Inti Indosawit Subur – Buatan I POM is not producing or selling end-product to consumer. No labelling on product whatsoever.	Not Applicable

	<p>product even if it is not eligible for a product-specific under RSPO rules. The end product must not be labelled as certified or sold in such a way that implies RSPO certification.</p> <p>For example, a retailer or food service company may require a breakdown of all palm based ingredients within an end product and the certified status of each. This information may be provided by a certified RSPO member without constituting a product-specific claim.</p>	Not applicable.	
MODULE B – MASS BALANCE SPECIFIC RULES			
Minimum Mass Balance content			
	95% or above of the oil palm content must be RSPO MB-certified.	PT Inti Indosawit Subur –Buatan I POM is producing and selling CSPO and CSPK; All CSPO/CSPK sold are 100 % content oil palm RSPO MB-certified.	Complied
	Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.	There is percentage of non-certified oil palm within the product CSPO/CSPK. PT Inti Indosawit Subur – Buatan I POM was not produce end consumer goods. The production are CPO and PK.	Complied
Labelling and trademark (MB)			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> • Surrounded by the text: 'Certified sustainable palm oil'. • The RSPO label MUST contain the tag 'MIXED'. The tag MIXED designates oil palm products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag 'MIXED' on a product does not guarantee that the product itself contains the 	<p>PT Inti Indosawit Subur (with the brand Asian Agri), did not use RSPO trademark in its corporate communication such in website.</p> <p>When confirming the sales of certified oil palm products, PT Inti Indosawit Subur – Buatan I POM followed the requirements of the RSPO SCCS. PT Inti Indosawit Subur – Buatan I POM stating the supply chain model and certificate number under which the claim is being made.</p>	Complied

	<p>certified material; some or all of it may reside in a product that does not carry a claim.</p> <ul style="list-style-type: none"> • 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). <p>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>		
Messaging (MB)			
	<p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <ul style="list-style-type: none"> • [Oil palm products]/[palm oil]/[palm kernel oil] from RSPO-certified mills and plantations were mixed with non-certified oil palm products in the supply chain. • The volume of [oil palm products][palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations. <p>In off-product communications, reference to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown in company records is allowed.</p> <p>Messaging NOT ALLOWED in storytelling in product-related communications:</p>	<p>PT Inti Indosawit Subur was not use storytelling in product-related communications.</p>	<p>Complied</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>Principle 4: Respect community and human rights and deliver benefit</p>			
<p>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>The company has had a corporate policy set on 14 July 2020 by Group Manager (GM) PT Inti Indosawit Subur – Group Buatan according to the Memorandum from GM No. 01/GM-Buatan/MEMO/VII/2020 dated 14 July 2020, related "<i>The policy prohibits any acts of revenge, intimidation and harassment for whistle-blowers / human rights defenders</i>" (Human Right Defender).</p> <p>The policy relating to human rights, is explained in point 13, stating that: "<i>The company respects human rights by treating all employees fairly, both in terms of acceptance, valuation, conditions and working environment, as well as representation regardless of tribe, caste, national origin, religion/belief, disability, gender, sexual orientation, membership of trade union political affiliation and/or age</i>".</p> <p>Corporate policy has been socialized/dissemination to all levels of PT Inti Indosawit Subur – Buatan Group employees on 10-12 February 2021 (list of participants can be shown) and on stakeholders (including local contractors) on 23-24 March 2021 which was attended by 31 stakeholders.</p> <p>Scheme Smallholder:</p> <p>Each KUD or Cooperative has organisation policy, for example: In KUD Bhakti Mandiri was established on 20 February 2022, in KUD Jaya Makmur was set on 22 February 2022, in KUD Sumber Rezeki was set on 27 February 2022 and also in KUD Sejahtera was set on 18 February 2022. The policy is contained as following:</p>	<p>Complied</p>

		<ol style="list-style-type: none"> 1) Compliance with regulation and law 2) Ethical behavior in business (prohibition of all forms of corruption, bribery, fraud in the use of funds and resources) 3) Environmental pollution 4) Occupational Health and Safety 5) Prohibition of the practice of burning land, peat areas and forest areas 6) Respect defenders without giving threats or intimidation 7) Respect human rights defenders without making threats or intimidation Prevents sexual harassment 8) Respect human rights by treating employees and peasants fairly and does not differentiate between ethnicity, caste, religion, and gender. 9) Prohibition of employing children under the age of 18 in every plantation operational activity. <p>This policy was socialized by the KUD/Cooperative each to all members, partners and surrounding communities, i.e In KUD Bhakti Mandiri was conducted on 20 February 2022, in KUD Jaya Makmur was set on 22 February 2022, in KUD Sumber Rezeki was set on 27 February 2022 and also in KUD Sejahtera was set on 18 February 2022</p> <p>The policy is also written in their farmer handbook "Buku Panduan Petani". The implementation of said policy in form of dissemination of anti-corruption policy, transparency in expenditure for road maintenance, fair calculation of worker payment, good quality FFB.</p>	
4.1.2	The unit of certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations.	<p>Based on the interview with stakeholder and documents review with the the Head of Simpang Perak Jaya Village and Kumbara Utama Village, Chief of Gender committee that PT Inti Indosawit Subur - Buatan Group, there is no any use of mercenaries and paramilitaries use in the operations.</p> <p>Up to this Surveillance audit, there is no issue or case related to the acts of violence against the employees of the company.</p>	Complied

Criteria 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.			
4.2.1	<p>(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>	<p>Buatan Estate and Mill</p> <p>Company has established a mechanism to handle complaint from external party, as written in "<i>Mekanisme Penanganan Keluhan</i>" – complaint handling mechanism (Doc. No. SOP AA-GL-5005-RO-01) while complaint from internal regulated under "<i>Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan</i>" – Employee' complaint and resolution mechanism (Doc. No. SOP-AA-HR-3008-RO 05) and responded not more than 14 days. These mechanisms have communicated to external parties and disseminated to PT Inti Indosawit Subur employees. Based on interview with local communities, Gender committee leader and worker union leader; they understood the procedure and mechanism to communicating complaint and/or grievance to company. Corporate policy has been socialized/dissemination to all levels of PT Inti Indosawit Subur – Buatan Group employees on 10-11 February 2022 (list of participants can be shown) and on stakeholders (including local contractors) on 23-24 March 2022 which was attended by 31 stakeholders.</p> <p>Scheme smallholders:</p> <p>The scheme smallholders have a mechanism of consultation and communication in "<i>Mekanisme Komunikasi, Konsultasi dan Keluhan</i>", dated 3rd January 2011. The procedure has been communicated to all members on 14 February 2021 and also recorded into the "<i>Buku Pintar</i>" for each of farmer. Meanwhile, each KUD has determined the personality who is in charge/responsible related to communication and communication, based on the Management Decree, as follows:</p> <ol style="list-style-type: none"> 1. Decree/SK No. 6 Kpts/KUD-BM/II/2018 dated 10 February 2018 concerning the appointment of communication and consultation officers at KUD Bhakti Mandiri to Bpk. Sugeng. 	Complied

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		<ol style="list-style-type: none"> 2. Decree/SK No. 6 Kpts/KUD-JM/I/2021 dated 09 January 2021 concerning the appointment of communication and consultation officers at KUD Jaya Makmur to Bpk. Wilis. 3. Decree/SK No. 4 Kpts/II/2018 dated 15 February 2018 concerning the appointment of communication and consultation officers at KUD Sejahtera to Bpk. Agusmiran. 4. Decree/SK No. 2/Kpts/KUD-SR/I/2020dated 11 January 2020 concerning the appointment of communication and consultation officers at KUD Sumber Rezeki to Bpk. Sumarlan. 	
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.	<p>Unit of Certification has established a mechanism to handle complaint from external party, as written in "<i>Mekanisme Penanganan Keluhan</i>" – complaint handling mechanism (Doc. No.SOP AA-GL- 5005-RO 01) while complaint from internal regulated under "<i>Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan</i>" – Employee' complaint and resolution mechanism (Doc. No.SOP-AA-HR-3008-RO 05). The procedure is how to handling complaint and grievances, the company keeps confidential complainer and whistleblower. Complaint and grievances is recorded in log Book and in "<i>Formulir Pencatatan Keluh Kesah dan Ketidakpuasan</i>". The company will endeavor to resolve complaints within 15 working days.</p> <p>These mechanisms has been communicated to external parties at the time conducting of communication and consultation with stakeholder, contractor and local communities on January 2022. While for the internal parties (all level employees at PT Inti Indosawit Subur – Buatan Group has been communicated on 19-21 January 2022 (list of participants can be shown during audit). Through this communication, the company explained about the mechanism of submission of complaints in detail and lasts in two directions (ask-answer/discussion), so if there are illiterate parties can understood.</p>	Complied

		<p>According to interview with management representatives and sustainability staff and also several of employees during the audit, there is no illiterate parties in estate, mill or scheme smallholders.</p>					
4.2.3	<p>The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.</p>	<p>Buatan Estate and Mill</p> <p>Company has established a mechanism to handle complaint from external party, as written in "Mekanisme Penanganan Keluhan" – complaint handling mechanism (Doc. No. SOP AA-GL-5005-RO-01 dated 22 August 2011) while complaint from internal regulated under "Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan" – Employee' complaint and resolution mechanism (Doc. No. SOP-AA-HR-3008-RO 05) and responded not more than 14 days. These mechanisms have communicated to external parties and disseminated to PT Inti Indosawit Subur employees.</p> <p>Certificate holder has had new procedure namely <i>SOP Penyampaian dan Penyelesaian Keluhan Karyawan</i> (SOP No: AA-HR-308.5-R1 effective dated 1 December 2019). This procedure also protected whistle blower anonymity. Referring to Asian Agri's website https://www.asianagri.com/id/panel-keberlanjutan/keluhan-pengaduan.</p> <p><i>Asian Agri is committed to responding quickly and constructively to any grievance raised against any of our own operations or our suppliers, and to report them publicly. We develop a robust grievance procedure to resolve all verifiable complaints and conflicts with all related stakeholders such as land conflicts, social conflicts, human right issues, labor issues, etc.</i></p> <table border="1" data-bbox="1064 1125 1937 1374"> <thead> <tr> <th data-bbox="1064 1125 1601 1173">Internal Reporting:</th> <th data-bbox="1601 1125 1937 1173">Channel/Remarks</th> </tr> </thead> <tbody> <tr> <td data-bbox="1064 1173 1601 1374"> <p><i>There are log books located in all estates and mills managed by Asian Agri's business units. Employees are free to file concerns and reports in these log books, on matters related to Asian Agri's sustainability policy. Concerns on operation disruptions faced by</i></p> </td> <td data-bbox="1601 1173 1937 1374"> <p><i>Log Books:</i></p> <ul style="list-style-type: none"> • <i>Disruption</i> • <i>Complaint</i> </td> </tr> </tbody> </table>	Internal Reporting:	Channel/Remarks	<p><i>There are log books located in all estates and mills managed by Asian Agri's business units. Employees are free to file concerns and reports in these log books, on matters related to Asian Agri's sustainability policy. Concerns on operation disruptions faced by</i></p>	<p><i>Log Books:</i></p> <ul style="list-style-type: none"> • <i>Disruption</i> • <i>Complaint</i> 	Complied
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		<p><i>employees may be documented in the Disruption Log Book. Issues pertaining to employee rights may be documented in the Complaint Log Book.</i></p>		
		<p><i>Confidential reports may be submitted through email or telephone to protect the identity of the reporter.</i></p>	<p><i>Poster on Whistleblowing is placed in every office of Asian Agri.</i></p> <ul style="list-style-type: none"> • Telephone: +62 811 910 7916 • Email: attention@asianagri.com 	
		<p><i>External Reporting:</i></p> <p><i>Stakeholders of Asian Agri including but not limited to Government, smallholders, suppliers, vendors, academicians, NGOs, media, etc), are provided different channels to report their concerns/findings.</i></p> <p><i>Reporters may share their concerns and information on business misconduct, corruption, harassment, criminal acts, environment, etc.</i></p> <p><i>All reports will be treated confidentially and if deemed appropriate, updates will be made publicly available as per our <u>Grievance mechanism</u>.</i></p>	<p><i>Channel/Remarks</i></p> <ul style="list-style-type: none"> • Email: grievance@asianagri.com • Address: Jl. MH Thamrin No. 31 Jakarta 10230 Indonesia • Fax: +62 21 230 1120 Attn.: Grievance Secretariat <p><i>Grievance submissions should be made using</i></p>	

		<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;"></td> <td style="width: 50%; text-align: right; vertical-align: top;"> <p><i>the Grievance Submission Form.</i></p> </td> </tr> </table> <p>This procedure is also applied to scheme smallholder operations.</p> <p>The procedure provides guidelines on handling grievances related to sustainability practices across our supply chain as well governance matters in our operations. The following grievance channels are available to support business transparency:</p> <p>The socialization of this procedure will be observed during onsite audit.</p> <p>Based on interviews with villagers around the plantation and related stakeholder (Plantation office and Environment Office of Pelalawan Regency), there is one complaint raised during the last audit until this onsite Recertification audit.</p> <p>This complaint was submitted by the community around the Kerinci River to the Pelalawan Regency Environmental Service on January 7, 2022 regarding the pollution of the Kerinci River caused by activities in Buatan I POM. Based on the report, PT Inti Indosawit Subur coordinated with DLH Kab. Pelalawan carried out field verification on January 7, 2022 based on the Minutes of Field Verification of the Case Report of Dead Fish in the Kerinci River dated January 24, 2022. Field verification was carried out by DLH Kab. Pelalawan on behalf of Deli Fitriyandi (Head of Environmental Law Enforcement and Complaints Service Section), Hechi Valentivo and Suratemi (Environmental Law Enforcement and Complaints Service Section staff) as well as from the Management of PT ISS – Buatan I represented by Parnel Saagih (Technical Control Made I POM) , Lindu Simatupang (Humas PT Inti Indosawit Subur), Andreas Ricahrd Sitompul (Estate Manager Buatan I), Rotamba Nababan (Assistant Buatan Buatan I) and Muhammad Akbar (Askep Buatan I Estate). From the results of field verification found the following facts:</p> <ul style="list-style-type: none"> i. The Kerinci River passes between the community settlements and the company area which flows into the Kuala Terusan River 		<p><i>the Grievance Submission Form.</i></p>	
	<p><i>the Grievance Submission Form.</i></p>				

		<ul style="list-style-type: none"> ii. The Kerinci River also crosses several bridges where one of the bridges is where dead fish are found. iii. The upper part of the Kerinci River crosses the PT Inti Indosawit Subur – Buatan I Plantation area with a length of +- 5 Km iv. In addition to PT Inti Indosawit Subur-Made I, there is also the Selasih Regional General Hospital which is located around the river flow with a distance of +- 1 Km. v. The scene where the dead fish were found was on the bridge crossing the PT RAPP corridor, which is about +- 10 Km from the Hulu Sungai which is in the PT Inti Indosawit Subur – Buatan I Plantation area and 5 Km from the Selasih Regional General Hospital. vi. When samples were taken at the scene of the dead fish, namely on the bridge crossing the PT RAPP corridor, there were still some dead fish, besides that many people took and picked up the dead fish. vii. No dead fish were found at the sampling site upstream of the river, the eastern causeway bridge, the Selasih Hospital Bridge and the Pelalawan Regent office crossroad bridge. viii. The dead fish were only found in the PT RAPP corridor crossing area. ix. For the downstream part of the river, namely the bridge across the Pelalawan Regent's Office, many people do fishing activities. <p>The Kerinci River water testing was carried out by the UPT Testing Laboratory of the Health and Environment Laboratory on January 10-21, 2022. Reference of analysis report is based on Peraturan Pemerintah Republic of Indonesia No. 22 of 2021 concerning the Implementation of Environmental Protection and Management.</p> <ul style="list-style-type: none"> • Test Result Report No. 0030-0038/LHU/LKL-PR/I/2022 dated January 10, 2022; for the water sample of the Lower Kerinci River. There is no measurement result that exceeds the quality standard. 	
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		<ul style="list-style-type: none"> • Test Result Report No. 0030-0037/LHU/LKL-PR/I/2022 dated January 10, 2022; for water samples from the Kerinci River where the fish died. There is no measurement result that exceeds the quality standard. • Test Result Report No. 0030-0036/LHU/LKL-PR/I/2022 dated January 10, 2022; for the water sample of the Central Kerinci River. There is no measurement result that exceeds the quality standard. <p>Based on the results of the summary of facts in the field and the results of the sample test, the possibility of wastewater pollution from the company PT Inti Indosawit Subur- Buatan I or RSUD Selasih has not been proven. To follow up on this case of dead fish, it is necessary to coordinate with the Fisheries Service and directives from the Head of the Pelalawan Regency Environmental Service.</p> <p>Scheme smallholders:</p> <p>The scheme smallholders have a mechanism of consultation and communication in "<i>Mekanisme Komunikasi, Konsultasi dan Keluhan</i>", dated 3rd January 2011. The procedure has been communicated to all members on November 2019 and also recorded into the "Buku Pintar" for each of farmer.</p> <p>During this surveillance audit, according the interview with several farmers on the ground, that there is no any grievance from farmers member. Although there is grievance which becomes an issue related to the FFB prices.</p> <p>In October 2021, scheme smallholder Buatan through FKPPKS (Forum Komunikasi Petani PIR Sawit Perkebunan Buatan) made a letter no. 003/FKPPKS-X/2021 regarding the application for plasma FFB prices.</p> <p>Buatan Plasma Manager has held a meeting with FKPPKS related to plasma FFB pricing on October 22, 2021 and resulted in a FFB price agreement based on Letter No. 184/ES-KLB/EXT/10/2021 dated October 22, 2021 claim Buatan Plasma FFB Market Pricing, mention that Market pricing of</p>	
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		<p>FFB outside of PBS and PBD will take effect on October 22, 2021, until the replanting period.</p>	
<p>4.2.4</p>	<p>The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.</p>	<p>Based on interview with sustainability staff, stakeholders and representative of local communities, that there is no new land expansion since certificate issued. There is no land conflict between PT. Inti Indosawit Subur – Buatan Mill/Estate with other party including with surrounding village.</p> <p>However, the company has established a mechanism to handle complaint from external party, “Mekanisme Penanganan Keluhan” – complaint handling mechanism (Doc. No. SOP AA-GL- 5005-RO 01). This procedure mentioned how the company solves the problem if any conflict occurred, both internal and external conflicts. This procedure also mentioned if the problem cannot be resolved by negotiation, the company will take legal action involving the related institution. Based on public consultation, this procedures have been socialized and accepted by local communities.</p> <p>In the event of a complaint that leads to a conflict with stakeholders, the company has established Procedures related to Conflict Handling SOP No. AA-GL-5003.1-R1 dated August 22, 2011, explains that:</p> <p>After Public Relations (Humas: Hubungan Masyarakat) receive conflict information (individuals, issues with surrounding communities, other representative institutions, media or newspapers), the company will analyze and map the problem through internal discussions (Estate manager, Managing Director, Regional Head and Stakeholder Relations), then Companies through Humas will provide opportunities access to relevant interested parties (Local Government, Legal Apparatus or legal advice) to obtain legal protection or independent technical assessments (Relevant agencies, for example: Plantation Service, National Land Agency-BPN). In this conflict resolution process, it is carried out through the FPIC process (making an agreement together with the conflicting party and or the institution) that represents it and if this does not meet an agreement, then litigation will be carried out or settlement through legal channels.</p>	<p>Not Applicable</p>

		<p>Based on interviews with villagers around the plantation, Simpang Perak Jaya and Kumbara Utama Village (Bpk. Rubina and Bpk. Suroso, related stakeholders (The plantation office and Environment Office of Pelalawan Regency on March 5, 2021, claimed that there were no complaints/disputes from the community around the plantation.</p> <p>During this surveillance audit, according the interview with several farmers on the ground, that there is no any grievance from farmers member. Although there is grievance which becomes an issue related to the FFB prices.</p> <p>In October 2021, scheme smallholder Buatan through FKPPKS (Forum Komunikasi Petani PIR Sawit Perkebunan Buatan) made a letter no. 003/FKPPKS-X/2021 regarding the application for plasma FFB prices.</p> <p>Buatan Plasma Manager has held a meeting with FKPPKS related to plasma FFB pricing on October 22, 2021 and resulted in a FFB price agreement based on Letter No. 184/ES-KLB/EXT/10/2021 dated October 22, 2021 calm Buatan Plasma FFB Market Pricing, mention that Market pricing of FFB outside of PBS and PBD will take effect on October 22, 2021, until the replanting period.</p>	
<p>Criteria 4.3: The unit of certification contributes to local sustainable development as agreed by local communities.</p>			
4.3.1	<p>Contributions to community development that are based on the results of consultation with local community are demonstrated.</p>	<p>Buatan I POM, Eatate and Scheme Smallholder:</p> <p>PT Inti Indosawit Subur-Buatan Group has established a CSR program for the period 2020-2021, the determination of this CSR program is determined based on consultation/deliberation with the surrounding village community (village head) through the Deliberation of Plans and Development (Musrenbang Desa) in the period 2021-2022. MUSRENBANG – <i>Musyawarah Perencanaan Pembangunan</i> for the period of 2022 has been conducted in January 2022 (for village planning period in 2022) at the surrounding villages. Musrenbang is a discussion forum between villagers conducted to discuss the problems and potential of the village to be well identified to provide a clear direction for appropriate actions according to the scale of</p>	Complied

		<p>priorities and implemented in addressing the problem or maximizing the potential that has as the basis of the village government's work program to carry out budgeting and annual activities of the village.</p> <p>Based on interviews with the village heads of Simpang Perak Jaya and Kumbara Utama Head Villages, that the annual CSR planning at The Buatan Group is always involves representatives of villages around the plantation through village development initiatives.</p>	
<p>Criteria 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.</p>			
<p>4.4.1</p>	<p>(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed (FPIC) process. Documents related to the history of land tenure and the actual legal or customary use of the land are available.</p>	<p>PT. Inti Indosawit Subur – Buatan Estate has prepared a mechanism to identify and calculate fair compensation or loss of legal or customary rights to land set out in the standard operating procedure (SOP) “Prosedur Penyelesaian Sengketa Lahan No. AA-GL-5003-1-R2”, dated 8th May 2015. The mechanism has taken into account FPIC Guide for RSPO Member 2015, whereby the procedure regulated information convey, negotiation, participative boundary measurement, involvement of other party and neighboring parties – in the boundary of the conflicted area (if any).</p> <p>Buatan I Estate and POM has obtained the legal ownership in the form of HGU, as follow:</p> <ol style="list-style-type: none"> 1. “Surat Keputusan Hak Guna Usaha” (Land Title), approved by “Menteri Negara Agraria/Kepala BPN No.10/HGU/1993 tentang Pemberian HGU atas nama PT. IIS, atas tanah di Kabupaten Kampar seluas 5,781.47 Ha”, dated 13th May 1993. 2. HGU (Land titles) No.01, 1993, dated 19th June 1993. for Buatan Estate (5,781 Ha). 3. Renewal land title No. 145/HGU/BPN/2004, dated 3rd November 2004 covering area 5,781 Ha and expired until 2058. <p>Scheme Smallholders:</p>	<p>Complied</p>

		Based on interview, KUD Sumber Rezeki and KUD Jaya Makmur, sampled smallholder member (farmer) and relevant authority, Plantation Agency of Pelalawan District; there was no case of land conflict between smallholder member and/or conflict with other party related to land status or boundary. Cooperatives have a conflicts resolution mechanism in “Mekanisme Penanganan Konflik” dated 1 st August 2014. The mechanism explaining flow process to resolution on land conflict, with involvement of company, village government and all related agencies.	
4.4.2	Copies documents evidencing agreement- making processes and negotiated agreements detailing the FPIC process are available and include: 4.4.2a Evidence that a plan has been developed through consultation and discussion held in good faith with all affected groups within the community, with specific assurances that vulnerable, minority and gender groups are asked for their opinions, and that information has been provided to all affected groups, including in it information about the steps taken to involve them in decision making.	Buatan Estate and Scheme Smallholder: Based on documents review and interview with local government and local communities surrounding the company, it was noted that no customary land or other legal rights within the company areas and in smallholder plantation. In addition, there is no land dispute between the company and communities surrounding their operational areas.	Complied
	4.4.2b 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;	Buatan Estate and Scheme Smallholder: Based on documents review and interview with local government and local communities surrounding the company, it was noted that no customary land or other legal rights within the company areas and in smallholder plantation. In addition, there is no land dispute between the company and communities surrounding their operational areas.	
	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.	Buatan Estate and Scheme Smallholder: Based on documents review and interview with local government and local communities surrounding the company, it was noted that no customary land or other legal rights within the company areas and in smallholder plantation.	

		In addition, there is no land dispute between the company and communities surrounding their operational areas.	
4.4.3	(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).	Buatan Estate and Scheme Smallholders: The Company and scheme smallholders have "Hak Guna Usaha (HGU)"/"Sertifikat Hak Milik (SHM)" Land title for smallholders. There is no customary land or legal rights within the company and scheme smallholdres area as the land originally was allocated as part of transmigration program. Based on documents review and interview with local government and local communities in surrounding of the company, it was noted there was no area/land that is under dispute.	Complied
4.4.4	All relevant information is available in appropriate forms and languages, including assessment of impact, proposed benefit sharing, and legal arrangements.	Buatan Estate and Scheme Smallholder: Based on documents review and interview with local government and local communities surrounding the company, it was noted that no customary land or other legal rights within the company areas and in smallholder plantation.	Complied
4.4.5	(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.	Buatan Estate and Scheme Smallholder: Based on stakeholder consultation with communities surrounding the plantation, there has never been social unrest related to presence of occupied land.	Complied
4.4.6	There is evidence that implementation of agreement negotiated through FPIC is annually reviewed in consultation with affected parties.	Buatan Estate and Scheme Smallholder: Based on documents review and interview with local government and local communities surrounding the company, it was noted that no customary land or other legal rights within the company areas and in smallholder plantation.	Complied
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.	Buatan Estate and Smalholder:	Complied

		There is no new planting within certified area of PT Inti Indosawit Subur – Buatan Estate and Buatan Plasma after November 2005. Currently, replanting activities are still in progress. All of the immature area was for replanting, for oil palm with planting year 1988, 1989, 1990 and 1991.	
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.	Buatan Estate and Smalholder: There is no new planting within certified area of PT Inti Indosawit Subur – Buatan Estate and Buatan Plasma after November 2005. Currently, replanting activities are still in progress. All of the immature area was for replanting, for oil palm with planting year 1988, 1989, 1990 and 1991.	Complied
4.5.3	Evidence is available that affected local peoples understand they have the right to say ‘agree’ or ‘not agree’ to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.	Buatan Estate and Smalholder: There is no new planting within certified area of PT Inti Indosawit Subur – Buatan Estate and Buatan Plasma after November 2005. Currently, replanting activities are still in progress. All of the immature area was for replanting, for oil palm with planting year 1988, 1989, 1990 and 1991.	Complied
4.5.4	To ensure local food and water security and as part of the FPIC process, SEIA participation and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of land allocations process.	Buatan Estate and Smalholder: There is no new planting within certified area of PT Inti Indosawit Subur – Buatan Estate and Buatan Plasma after November 2005. Currently, replanting activities are still in progress. All of the immature area was for replanting, for oil palm with planting year 1988, 1989, 1990 and 1991.	Complied
4.5.5	Evidence is available that the affected communities and rights holders have had the option to access information and advice, that is independent of the project proponent, concerning the legal,	Buatan Estate and Smalholder: There is no new planting within certified area of PT Inti Indosawit Subur – Buatan Estate and Buatan Plasma after November 2005. Currently,	Complied

	economic, environmental and social implications of the proposed operations on their lands.	replanting activities are still in progress. All of the immature area was for replanting, for oil palm with planting year 1988, 1989, 1990 and 1991.	
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.	Buatan Estate and Smalholder: There is no new planting within certified area of PT Inti Indosawit Subur – Buatan Estate and Buatan Plasma after November 2005. Currently, replanting activities are still in progress. All of the immature area was for replanting, for oil palm with planting year 1988, 1989, 1990 and 1991.	Complied
4.5.7	After 15 November 2018, new lands will not be acquired for plantations and mills as a result of recent (after November 2005) expropriations in the national interest (eminent domain) without FPIC process, except in cases of smallholders benefitting from agrarian reform or anti-drug programmes.	Buatan Estate and Smalholder: There is no new planting within certified area of PT Inti Indosawit Subur – Buatan Estate and Buatan Plasma after November 2005. Currently, replanting activities are still in progress. All of the immature area was for replanting, for oil palm with planting year 1988, 1989, 1990 and 1991. In addition, there is no new land acquisition done by PT Inti Indosawit Subur – Buatan I POM and its supply bases.	Complied
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation.	Buatan Estate and Smalholder: There is no new planting within certified area of PT Inti Indosawit Subur – Buatan Estate and Buatan Plasma after November 2005. Currently, replanting activities are still in progress. All of the immature area was for replanting, for oil palm with planting year 1988, 1989, 1990 and 1991. In addition, there is no new land acquisition done by PT Inti Indosawit Subur – Buatan I POM and its supply bases.	Complied
Criteria 4.6: Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			
4.6.1	(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.	Buatan I POM and Estate: PT. Inti Indosawit Subur – Buatan has prepared a mechanism to identify and calculate fair compensation or loss of legal or customary rights to land	Complied

		<p>set out in the standard operating procedure (SOP) "Prosedur Penyelesaian Sengketa Lahan No.AA-GL-5003-1-R2", dated 8th May 2015. The mechanism has taken into account FPIC Guide for RSPO Member 2015, whereby the procedure regulated information convey, negotiation, participative boundary measurement, involvement of other party and neighboring parties – in the boundary of the conflicted area (if any).</p> <p>Scheme Smallholders:</p> <p>Based on interview, KUD Jaya Makmur and KUD Sumber Rejeki, sampled smallholder member and relevant authority, Dinas Perkebunan Kabupaten Pelalawan (plantation agency); there was no case of land conflict between smallholder member and/or conflict with other party related to land status or boundary. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights</p> <p>Cooperatives have a conflicts resolution mechanism in "Mekanisme Penanganan Konflik" dated 1st August 2014. The mechanism explaining flow process to resolution on land conflict, with involvement of company, village government and all related agencies.</p>	
4.6.2	<p>(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p>	<p>Buatan I POM and Estate:</p> <p>PT. Inti Indosawit Subur – Buatan has prepared a mechanism to identify and calculate fair compensation or loss of legal or customary rights to land set out in the standard operating procedure (SOP) "Prosedur Penyelesaian Sengketa Lahan No.AA-GL-5003-1-R2", dated 8th May 2015. The mechanism has taken into account FPIC Guide for RSPO Member 2015, whereby the procedure regulated information convey, negotiation, participative boundary measurement, involvement of other party and neighboring parties – in the boundary of the conflicted area (if any).</p> <p>Scheme Smallholders:</p> <p>Based on interview, KUD jaya Makmur and KUD Sumber Rejeki, sampled smallholder member and relevant authority, Dinas Perkebunan Kabupaten</p>	Complied

		<p>Pelalawan (plantation agency); there was no case of land conflict between smallholder member and/or conflict with other party related to land status or boundary.</p> <p>Cooperatives have a conflicts resolution mechanism in “Mekanisme Penanganan Konflik” dated 1st August 2014. The mechanism explaining flow process to resolution on land conflict, with involvement of company, village government and all related agencies.</p> <p>There is no new planting within certified area of PT Inti Indosawit Subur – Buatan Estate and Buatan Plasma after November 2005. Currently, replanting activities are still in progress. All of the immature area was for replanting, for oil palm with planting year 1988, 1989, 1990 and 1991.</p>	
4.6.3	Evidence is available that equal opportunities are provided to both men and women to hold land titles for smallholdings (if possible based on local law, customs and/or agreement).	<p>Buatan I POM and Estate:</p> <p>Based on documents review and interview with local government and local communities surrounding the company, it was noted that no customary land or other legal rights within the company areas and in smallholder plantation.</p>	Complied
4.6.4	The process and outcomes of any negotiated agreements, compensation and payments are documented with evidence of the participation of affected parties and made available to them.	<p>Buatan I POM and Estate:</p> <p>Based on stakeholder consultation, there is no expansion plan in business plan. There is no land conflict between PT. Inti Indosawit Subur – Buatan with other party including with surrounding village.</p> <p>Scheme smallholder:</p> <p>The Scheme Smallholder area of PT. Inti Indosawit Subur – Buatan falls in government program for “Perkebunan Inti Rakyat – Transmigrasi/PIR-Trans” as per “Keputusan menteri Transmigrasi No.Kep.90/MEN/1990 tentang Izin Pelaksanaan Transmigrasi PIR-Trans kepada PT. Inti Indosawit Subur I dengan Komoditas Kelapa Sawit di Lokasi Pangkalan Kuras, Kabupaten Kampar dan Pasir Penyau, Kabupaten Indragiri Hulu, Provinsi Riau” dated 29th July 1991.</p> <p>From this background, it was understood the scheme smallholder obtained the land ownership through government program PIR-Trans. Therefore it</p>	Complied

		<p>was not gone through compensation process to previous traditional landowners because the land was state land, free from ownership right. Currently, all scheme smallholder members have been granted with "Sertifikat Hak Milik/SHM" (land title) from "Badan Pertanahan Nasional /BPN".</p>	
<p>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.</p>			
<p>4.7.1</p>	<p>(C) A mutually agreed procedure for identifying people entitled to compensation is in place.</p>	<p>Buatan I POM and Estate: PT. Inti Indosawit Subur – Buatan has prepared a mechanism to identify and calculate fair compensation or loss of legal or customary rights to land set out in the standard operating procedure (SOP) "Prosedur Penyelesaian Sengketa Lahan No.AA-GL-5003-1-R2", dated 8th May 2015. The mechanism has taken into account FPIC Guide for RSPO Member 2015, whereby the procedure regulated information convey, negotiation, participative boundary measurement, involvement of other party and neighboring parties – in the boundary of the conflicted area (if any).</p> <p>Scheme Smallholders: Based on interview, KUD Jaya Makmur and KUD Sumber Rejeki, sampled smallholder member and relevant authority, Dinas Perkebunan Kabupaten Pelalawan (plantation agency); there was no case of land conflict between smallholder member and/or conflict with other party related to land status or boundary. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights</p> <p>Cooperatives have a conflicts resolution mechanism in "Mekanisme Penanganan Konflik" dated 1st August 2014. The mechanism explaining flow process to resolution on land conflict, with involvement of company, village government and all related agencies.</p>	<p>Complied</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>Buatan I POM and Estate: PT. Inti Indosawit Subur – Buatan has prepared a mechanism to identify and calculate fair compensation or loss of legal or customary rights to land set out in the standard operating procedure (SOP) “Prosedur Penyelesaian Sengketa Lahan No.AA-GL-5003-1-R2”, dated 8th May 2015. The mechanism has taken into account FPIC Guide for RSPO Member 2015, whereby the procedure regulated information convey, negotiation, participative boundary measurement, involvement of other party and neighboring parties – in the boundary of the conflicted area (if any). Scheme Smallholders: Based on interview, KUD Jaya Makmur and KUD Sumber Rejeki, sampled smallholder member and relevant authority, Dinas Perkebunan Kabupaten Pelalawan (plantation agency); there was no case of land conflict between smallholder member and/or conflict with other party related to land status or boundary. Smallholders land obtained based on government program “Transmigrasi” in early 1980’s, therefore all smallholders plots already have legal use rights Cooperatives have a conflicts resolution mechanism in “Mekanisme Penanganan Konflik” dated 1st August 2014. The mechanism explaining flow process to resolution on land conflict, with involvement of company, village government and all related agencies.</p>	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>Buatan I POM and Estate: PT. Inti Indosawit Subur – Buatan has prepared a mechanism to identify and calculate fair compensation or loss of legal or customary rights to land set out in the standard operating procedure (SOP) “Prosedur Penyelesaian Sengketa Lahan No.AA-GL-5003-1-R2”, dated 8th May 2015. The mechanism has taken into account FPIC Guide for RSPO Member 2015, whereby the procedure regulated information convey, negotiation,</p>	Complied

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<p>Criteria 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrated that they have legal customary, or user rights.</p>			
4.8.1	<p>Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.</p>	<p>Buatan I Estate and Scheme Smallholders:</p> <p>Based on documents review and interview with local government and local communities surrounding the company, it was noted that no customary land or legal rights within the company and scheme smallholder’s areas.</p> <p>All company plantation and scheme smallholder area have been issued with valid land title in the form of “<i>Hak Guna Usaha/HGU</i>” for company and “<i>Sertifikat Hak Milik</i>” for smallholder.</p> <p>Based on interview with member of KUD Jaya Makmur, Farmer Group No. 41 and plot No. 966, 967, 992 and Farmer Group No. 42 plot no. 946 and 947, the boundary markers between smallholder block, as well as boundary markers with neighbouring farmer group has been established. There was no land dispute noted.</p>	Complied

4.8.2	<p>(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.</p>	<p>Buatan I Estate and Scheme Smallholders: Based on documents review and interview with local government and local communities surrounding the company, it was noted that no customary land or legal rights within the company and scheme smallholder's areas. All company plantation and scheme smallholder area have been issued with valid land title in the form of "<i>Hak Guna Usaha/HGU</i>" for company and "<i>Sertifikat Hak Milik</i>" for smallholder. Based on interview with member of KUD Jaya Makmur, Farmer Group No. 41 and plot No. 966, 967, 992 and Farmer Group No. 42 plot no. 946 and 947, the boundary markers between smallholder block, as well as boundary markers with neighbouring farmer group has been established. There was no land dispute noted.</p>	Complied
4.8.3	<p>Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4).</p>	<p>Buatan I Estate and Scheme Smallholders: Based on documents review and interview with local government and local communities surrounding the company, it was noted that no customary land or legal rights within the company and scheme smallholder's areas. All company plantation and scheme smallholder area have been issued with valid land title in the form of "<i>Hak Guna Usaha/HGU</i>" for company and "<i>Sertifikat Hak Milik</i>" for smallholder. Based on interview with member of KUD Jaya Makmur, Farmer Group No. 41 and plot No. 966, 967, 992 and Farmer Group No. 42 plot no. 946 and 947, the boundary markers between smallholder block, as well as boundary markers with neighbouring farmer group has been established. There was no land dispute noted.</p>	Complied
4.8.4	<p>For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable).</p>	<p>Buatan Estate and Scheme Smallholders: Based on interview with surrounding village societies, local communities, field visit and verification of company documentation; there is no land</p>	Complied

		<p>dispute between company PT Inti Indosawit Subur or Buatan Smallholder and surrounding community.</p> <p>Land ownership status of Scheme Smallholder is granted by government program namely Transmigration Program since 1992 – 1995 (PIR - TRANS).</p>	
<p>Principle 5: Support smallholder inclusion</p> <p>Include smallholders in RSPO supply chains and improve their livelihoods through fair and transparent partnerships.</p>			
<p>Criteria 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.</p>			
5.1.1	<p>Current and previous period prices for FFB are publicly available and accessible by smallholders.</p>	<p>Based on interview with management representative i.e. public affair staff, sustainability and plasma manager obtained information that the actual prices informed directly to the board of plasma or other FFB supplier. The actual prices also informed by social media messenger such as WhatsApp or by phone call.</p> <p>During the audit, Kebun Plasma Buatan has showed the FFB payment receipt period April 2022 in accordance with official FFB price that issued by FFB Pricing Team of Riau Province. All smallholder classified as up to 25 year which is the lower price due to the extraction that diminished. Sighted the payments record of KUD Bakti, KUD Bhakti Mandiri, KUD Jaya Makmur, KUD Sumber Rejeki, and KUD Sejahtera period April 2022. All payments have been complied with the pricing that stipulated by FFB Pricing Team of Riau Province.</p> <p>Based on field visit and interview with smallholder member during ASA 2.1 – the FFB price that issued by FFB Pricing Team of Riau Province available in board of each KUD.</p>	Complied
5.1.2	<p>(C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.</p>	<p>Based on document verification of Memorandum of Understanding (MoU) between the smallholders/KUD and PT Inti Indosawit Subur obtain information that the FFB pricing has followed the official FFB price stipulated by FFB Pricing Team of Riau Province.</p>	Complied

		<p>During the audit, Kebun Plasma Buatan has showed the FFB payment receipt period April 2022 in accordance with official FFB price that issued by FFB Pricing Team of Riau Province. All smallholder classified as up to 25 year which is the lower price due to the extraction that diminished. Sighted the payments record of KUD Bakti, KUD Bhakti Mandiri, KUD Jaya Makmur, KUD Sumber Rejeki, and KUD Sejahtera period April 2022. All payments have been complied with the pricing that stipulated by FFB Pricing Team of Riau Province.</p> <p>According to the local regulation in Riau Province, the FFB Price updated weekly (every 7 days). For example, minutes of meeting of FFB pricing meeting</p> <ul style="list-style-type: none"> • No: 21/TPH TBS-III/2022 for period 18 – 24 March 2022. • No: 23/TPH TBS-IV/2022 for period 2 – 8 April 2022. • No: 29/TPH TBS-IV/2022 for period 9 – 15 April 2022. <p>The FFB payments conducted monthly.</p> <p>For example, there was a receipt of FFB payments period of KUD Bhakti Mandiri was established on 20 February 2022, in KUD Jaya Makmur was set on 22 February 2022, in KUD Sumber Rezeki was set on 27 February 2022 and also in KUD Sejahtera was set on 18 February 2022.</p>	
5.1.3	<p>(C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.</p>	<p>Management of PT Inti Indosawit Subur – Buatan Group has committed to share the RSPO premium price and in accordance with the agreement with their smallholder, premium sharing is not distributed in the form of money but in the form of smallholder empowerment activities aimed at increasing the competence and competitiveness of smallholders based on participatory suggest from the smallholders.</p> <p>During this audit obtained information that the premium sharing for Buatan Plasma period 2021 has been distributed on 10 December 2021. Buatan Plasma using that fund for:</p> <ul style="list-style-type: none"> • Installation of boundary poles. 	Complied

		<ul style="list-style-type: none"> • Providing PPE for harvester. • Alternative income (cattle). • Purchasing the stationery and office equipment. • HCV signboards. <p>Based on interview with the smallholder’s representatives known that the training has given the positive insight to the smallholders to facing the replanting period - the refreshment socialization was conducted to all smallholder member. In KUD Bhakti Mandiri, was established on 20 February 2022, in KUD Jaya Makmur was set on 22 February 2022, in KUD Sumber Rezeki was set on 27 February 2022 and also in KUD Sejahtera was set on 18 February 2022.</p> <p>Some smallholders have prepared the alternative income during the replanting with other business such as quail farm, goat and cows and domestic waste composting.</p>	
5.1.4	(C) Evidences is available that all parties, including women and independent representative organization assisting smallholders where requested, are involved in the decision making processes and understand the contracts. These include involving finance, loans/credits, and re-payments through FFB price reductions for replanting and/or, other support mechanisms where applicable.	The smallholder’s member of Buatan Plasma originated from government transmigration program on 1990 – 1991. Mostly from East Java, West Java and local area (Riau Province). Based on information obtained during the onsite audit known that some of smallholders’ member were women. The annual meeting of KUD always invited all members which is some women. All the decision made was involved the smallholder members, including women members.	Complied
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe.	Based on interview with management representative i.e. Public affair staff, sustainability and plasma manager obtained information that all the contract is signed by both parties. Based on document all contract is written in Bahasa. For example: Contract with Plasma (KUD. Bhakti Mandiri and KUD Sejahtera) for supply FFB No.07/SPK-TBS/IIS-PT/XI/93 “Perjanjian Kerjasama antara Petani Peserta PIR-Trans dengan PT. Inti Indosawit Subur”.	Complied

		Based on document review and interview with KUD confirmed that agreement between company and KUDs is made fairly, legal and transparent and have an agreed timeframe.	
5.1.6	(C) Agreed payments are made in a timely manner and receipts specifying price, weigh, deductions and amount paid are given.	<p>Based on document verification sighted that monthly invoice for FFB payment contains data of price, weigh, deductions and amount paid are given.</p> <p>During this onsite ASA 2.1 – year 2022, auditor team has observed the supplier, which is CV Mandiri Sentosa (long term agreement). Based on document verification and interview with Create Share Value (CSV) staff obtained information that both suppliers have been verified and visited by FFB purchasing staff. By visited the suppliers obtained information that the FFB payments area in line with the agreement. Usually, FFB payments paid not more than 3 days after the FFB received by mill. There was no payments dispute or issues so far.</p>	Complied
5.1.7	Weighing equipment is verified by an independent third party on a regular basis.	<p>Weighbridge in Buatan I POM is verified by government agency in annual basis. Latest verification was performed on 09 September 2021 by UPTD METROLOGI LEGAL Dinas Perindustrian dan Perdagangan Kabupaten Siak. Weighbridges calibration certificate were sighted during audit:</p> <ul style="list-style-type: none"> • Surat Keterangan Hasil Pengujian Nomor: 510/DPP/UPTD-ML/SKHP/2021-IX/176, dated 15 September 2021, valid until 09 September 2022. Weighbridge Avery weigh Tronix; Serial Number 171050118; Type: E1205; Capacity 50,000 kg. • Surat Keterangan Hasil Pengujian Nomor: 510/DPP/UPTD-ML/SKHP/2021-IX/177, dated 15 September 2021, valid until 09 September 2022. Weighbridge Avery weigh Tronix; Serial Number 112850291; Type: E1205; Capacity 50,000 kg. <p>According to certificate it was noted that verification results were comply to requirement, endorsed based on UU RI No. 2 Year 1981 concerning Metrology Legal.</p>	Complied

5.1.8	The unit of certification supports Independent smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholder on who runs the Internal Controlling System (ICS), who holds the certificate, and who owns and sells certified materials.	<p>Based on review of agreement, the company carried out the development and provide supervision in KUD (Scheme Smallholder). The company support KUD in form of supervision in upkeep, fertilizer application, harvesting, FFB transport and implementation of RSPO P&C requirements.</p> <p>For independent Smallholder, supports is provided in the form of CSV Program (Create Share Value). Member of CSV who have cooperation with the company are Sutarno Kudin, Haluga, Samsuwar, Budi and Suhono. Form of support is the company give coaching to the independent smallholder related good agriculture practices, organisation and administration.</p> <p>According to the interview with CSV staff of Buatan Group during ASA 2.1- May 2022 has informed that all the smallholders or independent supplier area are in legally for palm oil plantation.</p> <p>Certification program for ISH (ISPO) still in preparation in 2022.</p>	Complied
5.1.9	(C) The unit of certification has a grievance mechanism for smallholders, and all grievances raised are dealt with in a timely manner.	<p>Buatan Estate and Mill</p> <p>PT Inti Indosawti SUBur – Buatan I POM has established a mechanism to handle complaint from external party, as written in “Mekanisme Penanganan Keluhan” – complaint handling mechanism (Doc. No. SOP AA-GL-5005-RO-01 dated 22 August 2011) while complaint from internal regulated under “Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan” – Employee’ complaint and resolution mechanism (Doc. No. SOP-AA-HR-3008-RO 05) and responded not more than 14 days. These mechanisms have communicated to external parties and disseminated to PT Inti Indosawit Subur employees.</p> <p>PT Inti Indosawti Subur – Buatan I POM has prepared the procedure namely <i>SOP Penyampaian dan Penyelesaian Keluhan Karyawan</i> (SOP No: AA-HR-308.5-R1 effective dated 1 December 2019). This procedure also protected whistle blower anonymity. Referring to Asian Agri’s website https://www.asianagri.com/id/panel-keberlanjutan/keluhan-pengaduan.</p>	Complied

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		<p><i>Asian Agri is committed to responding quickly and constructively to any grievance raised against any of our own operations or our suppliers, and to report them publicly. We develop a robust grievance procedure to resolve all verifiable complaints and conflicts with all related stakeholders such as land conflicts, social conflicts, human right issues, labor issues, etc.</i></p> <table border="1"> <thead> <tr> <th data-bbox="1066 531 1597 582">Internal Reporting:</th> <th data-bbox="1597 531 1942 582">Channel/Remarks</th> </tr> </thead> <tbody> <tr> <td data-bbox="1066 582 1597 922"> <p><i>There are log books located in all estates and mills managed by Asian Agri's business units. Employees are free to file concerns and reports in these log books, on matters related to Asian Agri's sustainability policy. Concerns on operation disruptions faced by employees may be documented in the Disruption Log Book. Issues pertaining to employee rights may be documented in the Complaint Log Book.</i></p> </td> <td data-bbox="1597 582 1942 922"> <p><i>Log Books:</i></p> <ul style="list-style-type: none"> • <i>Disruption</i> • <i>Complaint</i> </td> </tr> <tr> <td data-bbox="1066 922 1597 1182"> <p><i>Confidential reports may be submitted through email or telephone to protect the identity of the reporter.</i></p> </td> <td data-bbox="1597 922 1942 1182"> <p><i>Poster on Whistleblowing is placed in every office of Asian Agri.</i></p> <p><i>Telephone: +62 811 910 7916</i></p> <p><i>Email: attention@asianagri.com</i></p> </td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th data-bbox="1066 1233 1576 1284">External Reporting:</th> <th data-bbox="1576 1233 1942 1284">Channel/Remarks</th> </tr> </thead> <tbody> <tr> <td data-bbox="1066 1284 1576 1394"> <p><i>Stakeholders of Asian Agri including but not limited to Government, smallholders, suppliers, vendors, academicians, NGOs,</i></p> </td> <td data-bbox="1576 1284 1942 1394"> <ul style="list-style-type: none"> • <i>Email: grievance@asianagri.com</i> </td> </tr> </tbody> </table>	Internal Reporting:	Channel/Remarks	<p><i>There are log books located in all estates and mills managed by Asian Agri's business units. Employees are free to file concerns and reports in these log books, on matters related to Asian Agri's sustainability policy. Concerns on operation disruptions faced by employees may be documented in the Disruption Log Book. Issues pertaining to employee rights may be documented in the Complaint Log Book.</i></p>	<p><i>Log Books:</i></p> <ul style="list-style-type: none"> • <i>Disruption</i> • <i>Complaint</i> 	<p><i>Confidential reports may be submitted through email or telephone to protect the identity of the reporter.</i></p>	<p><i>Poster on Whistleblowing is placed in every office of Asian Agri.</i></p> <p><i>Telephone: +62 811 910 7916</i></p> <p><i>Email: attention@asianagri.com</i></p>	External Reporting:	Channel/Remarks	<p><i>Stakeholders of Asian Agri including but not limited to Government, smallholders, suppliers, vendors, academicians, NGOs,</i></p>	<ul style="list-style-type: none"> • <i>Email: grievance@asianagri.com</i>
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		<p><i>media, etc), are provided different channels to report their concerns/findings.</i></p> <p><i>Reporters may share their concerns and information on business misconduct, corruption, harassment, criminal acts, environment, etc.</i></p> <p><i>All reports will be treated confidentially and if deemed appropriate, updates will be made publicly available as per our <u>Grievance mechanism</u>.</i></p>	<ul style="list-style-type: none"> • <i>Address:</i> <i>Jl. MH Thamrin No. 31</i> <i>Jakarta 10230</i> <i>Indonesia</i> • <i>Fax: +62 21 230 1120</i> <i>Attn.: Grievance Secretariat</i> <i>Grievance submissions should be made using the <u>Grievance Submission Form</u>.</i> 	
		<p>This procedure is also applied to scheme smallholder operational.</p> <p>The procedure provides guidelines on handling grievances related to sustainability practices across our supply chain as well governance matters in our operations. The following grievance channels are available to support business transparency:</p> <p>This mechanism has been socialized/disseminated to all levels of PT Inti Indosawit Subur – on 10-12 February 2021 (list of participants can be shown) and on stakeholders (including local contractors) on 23-24 March 2021 which was attended by 31 stakeholders. Evidence of socialization can be shown during audit.</p> <p>Based on interviews with villagers around the plantation and related stakeholder (Plantation office and Environment Office of Pelalawan Regency) confirmed that there is no complaint raised during the last audit until this onsite Recertification audit.</p> <p>Scheme smallholders:</p>		

		<p>The scheme smallholders have a mechanism of consultation and communication in “<i>Mekanisme Komunikasi, Konsultasi dan Keluhan</i>”, dated 3rd January 2011. The procedure has been communicated to all members on November 2019 and also recorded into the “Buku Pintar” for each of farmer.</p> <p>During this surveillance audit, according the interview with several farmers on the ground, that there is no any grievance from farmers member. Although there is grievance which becomes an issue related to the FFB prices.</p> <p>In October 2021, scheme smallholder Buatan through FKPPKS (Forum Komunikasi Petani PIR Sawit Perkebunan Buatan) made a letter no. 003/FKPPKS-X/2021 regarding the application for plasma FFB prices.</p> <p>Buatan Plasma Manager has held a meeting with FKPPKS related to plasma FFB pricing on October 22, 2021 and resulted in a FFB price agreement based on Letter No. 184/ES-KLB/EXT/10/2021 dated October 22, 2021 calm Buatan Plasma FFB Market Pricing, mention that Market pricing of FFB outside of PBS and PBD will take effect on October 22, 2021, until the replanting period.</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>Buatan I POM and Estate:</p> <p>PT Inti Indosawit Subur – Buatan I POM has 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. PT Inti Indosawit Subur has collaborated with smallholders around plantations and is incorporated in the CSV (Create Share Value) Program, namely: Sawit Jaya Mandiri Association with an area of 832 ha located in SP2, SP4 and SP6 village with a total of 13 farmer groups.</p>	Complied

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		<p>Based on an interview with the person in charge of the Buatan Group CSV, a consultation with farmers was held on February 13, 2020, which was attended by 16 farmers and the head of the farmer group, that there are some expectations of the farmers, including:</p> <ul style="list-style-type: none"> • FFB prices are relatively stable • Assistance in developing BMP in increasing production • Assistance in maintaining production road access to the factory for smooth delivery of FFB to the mill <p>The PT Inti Indosawit Subur CSV team has provided guidance to smallholder farmers by conducting several training activities, including:</p> <ul style="list-style-type: none"> • Training related to fertilizer use on 4 December 2021 was attended by 200 farmers. • Farmer Training in Certification Preparation including Group Dynamics training was conducted on 4 December 2021. <p>PT Inti Indosawit Subur – Buatan I POM has developed and implement livelihood improvement programmes of Smallholders in surrounding communities. The company is helping the development through provides technical guidance, financial credit, fertilizer support and receiving the FFB production from certified Scheme Smallholder (KUD)</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>PT Inti Indosawit Subur – Buatan Group sets a scheme manager, with field assistant assigned for each cooperative to improve smallholder management, including productivity. Each year, company provisioned training program, aside from day-to-day operation monitoring by field assistant, e.g.:</p> <ul style="list-style-type: none"> • Training related to fertilizer use on 4 December 2021 was attended by 200 farmers. • Farmer Training in Certification Preparation including Group Dynamics training was conducted on 4 December 2021. 	Complied

<p>5.2.3</p>	<p>Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.</p>	<p>Buatan I POM supplied by own estates (Buatan Estate), smallholder from 4 KUD's and third party's supplier. Based on interview with smallholder representatives from Smallholders Scheme: KUD Bhakti Mandiri, KUD Jaya Makmur, KUD Sumber Rejeki, KUD Sejahtera Jaya obtain information that entire land has been granted by government (private land title/SHM).</p> <p>According to the signboard in mill's gate, Buatan I POM does not accept FFB from illegal sources (forest area or crop stolen). All FFB from third parties shall comply with regulation. Mill's staff told that FFB Purchasing Department has set the procedures for their supplier as follows:</p> <ul style="list-style-type: none"> • New supplier shall propose their FFB purchased offer including submitted the name and land legality of each potential farmer. • FFB Purchasing Department verify the geolocation of potential farmer that submitted by the third parties. • New supplier shall sign the agreement which stated to not send illegal FFB sources. This agreement will automatically be cancelled if any violation on this clause. • The FFB transporter shall signed the zero illegal FFB statement letter in security gate in each delivery note. <p>Based on interview with smallholder representatives during ASA 2.1 – May 2022, from KUD Bhakti Mandiri, KUD Jaya Makmur, KUD Sumber Rejeki and KUD Sejahtera obtain information that entire land has been granted by government (private land title). Asian Agri's through his subsidiary PT. Inti Indosawit Subur fully supported their smallholder to be certified by ensuring all FFB come from legal sources and comply with national regulation. They also conducted good engagement to demonstrated best management practices in agronomy, environmental handling and safety procedures. For example, each plot received 4 unit barn owl box to help them control rat population.</p> <p>During the audit, auditor also obtain information that PT. Inti Indosawit Subur are now assisting the smallholders on replanting project in</p>	<p>Complied</p>
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		collaborated with local government. This aims to ensure that farmers produce palm oil sustainably.	
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	PT Inti Indosawit Subur - Buatan Group has created a training program especially related to the handling/use of herbicides and pesticides for plasma farmers: Training on 25 May 2021; Limited Pesticides and K3 training, attended by 36 farmers from KUD Bhakti Mandiri. 22 farmers from KUD Jaya Makmur and 23 farmers from KUD Sejahtera.	Complied
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	Annual review of progress of the smallholder support by Asian Agri's can be see and downloaded in Asian Agri's website https://www.asianagri.com/id/panel-keberlanjutan/laporan-keberlanjutan . That document is publicly available. Plasma manager also described that PT Inti Indosawit Subur also helped the smallholder based on monthly management review of smallholder performance as follows: <ul style="list-style-type: none"> • Assisted the KUD's to achieve the production and upkeep target. Until this audit, plasma area has been achieved 5% above the target. • Assisting the KUD's in replanting program. Based on field visit and interview with smallholder representatives, each KUD's has been supported in IPM program. They equipped with beneficial plant and barn owl box (4 unit each plot). Certificate holder also conducted training in order to ensure the smallholder's competency. For example: <ul style="list-style-type: none"> • Training related to fertilizer use on 4 December 2021 was attended by 200 farmers. • Farmer Training in Certification Preparation including Group Dynamics training was conducted on 4 December 2021. 	Complied

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	<p>(C) A publicity available non-discrimination and equal opportunity policy is implemented in such way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.</p>	<p>PT Inti Indosawit Subur has established the Company Policy on Equal Opportunities as documented in “Kebijakan Perusahaan”, dated 1st December 2014: “Memperlakukan seluruh karyawan secara adil, baik dalam hal penerimaan, penilaian kondisi dan lingkungan kerja, serta keterwakilan tanpa memandang suku, kasta, asal Negara, agama/ kepercayaan, cacat, gender, orientasi seksual, keanggotaan serikat pekerja, afiliasi politik dan atau umur” - to treat all member of cooperative in fair manner, and respect human rights, and representative without any discrimination on tribe, race, caste, country of origin, religion/belief, disability, gender, sexual orientation, union affiliation, political affiliation or age.</p> <p>The company's policy has communicated to all levels of PT Inti Indosawit Subur – Buatan Group employees on 5th February 2022 (data verified: attendance list, socialization material, documentation). The has also socialization to all stakeholders (including local contractors) on 2 April 2022 was attended by 31 stakeholders.</p> <p>Group Manager has established the ICS Policy under “Kebijakan Group Manager”, for example: In KUD Bhakti Mandiri was established on 20 February 2022, in KUD Jaya Makmur was set on 22 February 2022, in KUD Sumber Rezeki was set on 27 February 2022 and also in KUD Sejahtera was set on 18 February 2022, that was signed by Manajer Group ICS Buatan, in point 9 was mentoned “Menghormati HAM, serta keterwakilan tanpa memandang suku, kasta, asal negara, agama/kepercayaan, cacat, jender, orientasi seksual, keanggotaan serikat pekerja, afiliasi politik dan atau umur” – to treat all member of cooperative in fair manner, and respect human rights, and representative without any discrimination on tribe, race, caste, country of origin, religion/belief, disability, gender, sexual</p>	Complied

		orientation, union affiliation, political affiliation or age. The Policy has communicated to all smallholder member.	
6.1.2	(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.	Based on interviews during field audits in 2022, workers know if there have been cases of discrimination, for example, a review of payroll documents for April 2022 and May 2022 found no evidence of discrimination. Workers and groups including local communities, women and migrant workers do not experience discrimination.	Complied
6.1.3	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.	PT Inti Indosawit Subur – Buatan POM demonstrated the commitment that the recruitment selection, hiring access to training and promotion are based on skills, capabilities, qualities and medical fitness. Such as: <ul style="list-style-type: none"> • The company has prepared a procedure for hiring workers, regulated that hiring and promotion of workers based on skill, work experiences, and job evaluation. • In the recruitment process, the company has set the standard of competence that inferred in the Position Description and Job Profile. Recruitment selection, hiring and promotion has based on skills, capabilities, qualities, and medical fitness. • Job opportunities were communicated and given to surrounding villagers at first priority where no discrimination found observed during interview and related records of workers being employed. All workers has treated equally in accordance with company regulation including rights of worker as well. The compliance in accordance with national laws has evaluated by the organisation as described in criterion 2.1. Annuals performance evaluation result of worker has shown. • All discrimination has prohibited for all area in estate and mill. PKB also mentioned ban of discrimination for all workers in the organization. Procedure for worker recruitment (SDM-A-001-00) and procedure for employee assessment (HRD C- 002-00) was available and mentioned there was no discrimination treatment during recruitment and promotion process. Promotion of worker will be done base on work 	Complied

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		<p>period, annual evaluation result, and availability of position.</p> <p>Data verified - Employment records are well maintained by the KTU – Buatan Estate, for example:</p> <ul style="list-style-type: none"> • Worker’s promotion Buatan Estate from temporary to permanent workers, based on Memorandum No. 045/HR-RO2/MEMO/SK/XI/2021, dated 11 November 2021, on behalf of Mr. K*s*m as Harvester. • Employee Promotion Application Letter from PKWT (temporary) to SKU-H (permanent) on 11 March 2022 as stated by Estate Manager letter No. 43/KBN/III/2022. The letter completed with the name of the employee proposed for appointment, Assessment Results of each employee, Statement letter of each employee, Types of training that have been attended by each employee, Job, and Responsibilities of each employee at the time of appointment. • Perjanjian Kerja Harian Lepas – Daily worker agreement No. 21/PKHL/KBN/III/2022 on behalf of R*s*j*d dated 2 March 2022. This Daily worker agreement has made duplicate. 	
6.1.4	<p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p>	<p>PT Inti Indosawit Subur – Buatan Group prohibits pregnant or breast-feeding women to perform chemical spraying. To mitigate, estate performed monthly pregnancy test.</p> <p>Buatan Estate has kept the record that spraying is not conducted by pregnant or breast-feeding women. The company has been conducting PP Test (pregnant test) every month.</p> <p>The last of pregnancy test conducted on 6 April 2022, 5 May 2022, and 6 June 2022. All the female sprayer in well condition and not being pregnant nor breast feeding. E.g.: Employee code: Mrs. J*m* *, W*sr**h and S* **t**</p> <p>Each KUD has conducted Pregnancy test conducted in monthly basis for 12 female pesticide operators KUD Bhakti Mandiri, KUD Jaya Makmur, KUD Sumber Rezeki, KUD Sejahtera. Documented evidence seen on 2nd May</p>	Complied

		2022 and 6 th June 2022 with result is no pregnant identified. Pregnancy test also perform to fertilizer applicator which dominated by female workers	
6.1.5	(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.	<p>A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>PT Inti Indosawit Subur – Buatan I POM has implemented the policy related to protection reproductive right; such as not hiring female for work activity with high risk; monthly pregnancy test for sprayer and fertilizer applicator; 6-monthly check up for sprayer and fertilizer applicator.</p> <p>All female worker in sprayer team and fertilizer team shall join pregnancy test in company clinic, once a month.</p> <p>Regular gender committee meeting on 3-monthly basis with focus to communicating roles and responsibilities for gender committee, understanding the definition of sexual harassment in workplace. Communicating specific grievance mechanism to handle and resolve sexual harassment case.</p> <p>Based on interviews with female workers and members of Gender Committee during ASA 2.1 – May 2022, has demonstrated they have understood the specifically policy to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women. The policy has also explained the reproductive rights protection policies for employees, for example the implementation of menstrual leave rights, maternity leave, special health checks for female workers who work as spraying and fertilizer workers, prohibition of violence/sexual harassment of female workers.</p>	Complied
6.1.6	There is evidence of equal pay for the same work scope.	<p>Buatan I POM, Estate and Scheme Smallholder:</p> <p>PT Inti Indosawati Subur – Buatan Group has stated the wages for workers base on Decree of Keputusan Gubernur Riau No. Kpts. 1272/XI/2021”,</p>	Complied

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		<p>dated 20/11/2021 for Upah Minimum Kabupaten/Kota in Province of Riau on 2022 is IDR 3,030,598.54/month (Pelalawan Regency).</p> <p>PT Inti Indosawti Subur – Buatan Group has demonstrated the structure and scale of the 2022 wage period based on Permenaker No. 1 of 2017. This wage scale structure is a determination of the amount of wages for permanent workers (SKU-B) based on class, rank/position.</p> <p>The Company has already set wage standard based on wages set by the government recorded on Memorandum no. 048/HR-R02/MEMO/IV/2022, dated 30 April 2022; regarding: "Upah Pekerja Golongan PHL, SKUH dan SKUB Tahun 2022" and also the determination of the daily wage for BHL (Daily workers) and SKUH and SKUB employees (permanent workers). On this memorandum is also determine regarding structure of wage for each level worker (SKU-H and SKU-B). The company is also gives a scripts/slip salary to employees before salary is given, salary slip also contains basic salary, allowances, premium, labor health coverage (BPJS Ketenagakerjaan and Kesehatan) and deduction as well.</p> <p>Data verified, Payslip month April 2022, such as:</p> <p>Mr. S*k*r*n* (BHL-Daily worker) – in Buatan I POM, working day: 20 days</p> <ul style="list-style-type: none"> • Basic salary IDR 3,030,598 • Process premium IDR - • Deductions: IDR 102,424 (including Payment of BPJS Kesehatan and Ketenagakerjaan) • Total take home pay: IDR 2,048,480 <p>Mr. T*g*h (BHL- Daily worker) – in Buatan I Estate, working day: 18 days</p> <ul style="list-style-type: none"> • Basic salary IDR 3,030,598 • Process Premium IDR - • Deductions: IDR 102,424; (including Payment of BPJS Kese and Ketenagakerjaan) 	
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		<ul style="list-style-type: none"> Total take home pay: IDR 1,843,632 <p>Mr. J***n* (SKUH-Fixed worker at ICS Officer), working day: 25 days</p> <ul style="list-style-type: none"> Basic salary IDR 3,030,598 Fringe Benefits IDR 579,200 Premium IDR 400,000 Deductions: IDR 120,677; (including Payment of BPJS Kese and Ketenagakerjaan) Total take home pay: IDR 3,907,374 	
<p>Criteria 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).</p>			
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>Buatan I POM and Estate:</p> <p>The company have established work agreement for permanent employees through joint work agreement (PKB-Perjanjian Kerja Bersama) in term for 2 years. During the audit the PKB is for period of 2018 - 2022 and has done registered by Dirjen PHI/JSK the Ministry of Manpower on 4 July 2018. The renewal of PKB or working agreement for 2021 – 2023 are still under process of approval and registration to Ministry of Manpower. According the provisions in the PKB it is stated that if the new PKB is not yet available, the old PKB is still valid to be used as a reference.</p> <p>The company has set employment provisions in accordance with the rules and legal requirement. It is stated on employment contract off daily labour on article 1 about the types of work, working hours (maximum 40 hours per week and working from Monday to Saturday) and the wages has provides is based on waging regulation (Decree of Governor of Riau) in effect at January 2020. Statements about wages, stated in PKB in Article V concerning Wages-Upah; stated: <i>"Pekerja harian Tetap dan Pekerja Bulanan diberi upah berupa uang yang ditetapkan berdasarkan kesepakatan bersama dengan BKS-PPS dengan PD.FSP.PP-SPSi Propinsi yang bersangkutan sesuai dengan peraturan perundangan Otonomi Daerah"</i></p>	Complied

		<p><i>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>PT Inti Indosawti Subur – Buatan Group has stated the wages for workers base on Decree of Keputusan Gubernur Riau No. Kpts. 1272/XI/2021”, dated 20/11/2021 for Upah Minimum Kabupaten/Kota in Province of Riau on 2022 is IDR 3,030,598.54/month (Pelalawan Regency).</p> <p>PT Inti Indosawti Subur – Buatan Group has demonstrated the composes the structure and scale of the 2022 wage period based on Permenaker No. 1 of 2017. This wage scale structure is a determination of the amount of wages for permanent workers (SKU-B) based on class, rank/position.</p> <p>The Company has already set wage standard based on wages set by the government recorded on Memorandum no. 048/HR-R02/MEMO/IV/2022, dated 30 April 2022; regarding: “Upah Pekerja Golongan PHL, SKUH dan SKUB Tahun 2022” and also the determination of the daily wage for BHL (Daily workers) and SKUH and SKUB employees (permanent workers). On this memorandum is also determine regarding structure of wage for each level worker (SKU-H and SKU-B). The company is also gives a scripts/slip salary to employees before salary is given, salary slip also contains basic salary, allowances, premium, labor health coverage (BPJS Ketenagakerjaan and Kesehatan) and deduction as well.</p> <p>Data verified, Payslip month April 2022, such as:</p> <p>Mr. S*k*r*n* (BHL-Daily worker) – in Buatan I POM, working day: 20 days</p> <ul style="list-style-type: none"> • Basic salary IDR 3,030,598 	
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		<ul style="list-style-type: none"> • Process premium IDR - • Deductions: IDR 102,424 (including Payment of BPJS Kesehatan and Ketenagakerjaan) • Total take home pay: IDR 2,048,480 <p>Mr. T*g*h (BHL- Daily worker) – in Buatan I Estate, working day: 18 days</p> <ul style="list-style-type: none"> • Basic salary IDR 3,030,598 • Process Premium IDR - • Deductions: IDR 102,424; (including Payment of BPJS Kese and Ketenagakerjaan) • Total take home pay: IDR 1,843,632 <p>Mr. J* **n* (SKUH-Fixed worker at ICS Officer), working day: 25 days</p> <ul style="list-style-type: none"> • Basic salary IDR 3,030,598 • Fringe Benefits IDR 579,200 • Premium IDR 400,000 • Deductions: IDR 120,677; (including Payment of BPJS Kese and Ketenagakerjaan) • Total take home pay: IDR 3,907,374 <p>Based on the sample pay slip above, that Buatan I Estate and Buatan I Mill have applied the wages of their employees in line with Law No. 13 of 2003 on Employment.</p> <p>Scheme Smallholder</p> <p>The application of employee harvest and fertilizer wages in Plasma Buatan I is based on Decree of Gubernur Riau No. Kpts. 1272/XI/2021”, dated 20/11/2021 for Upah Minimum Kabupaten/Kota in Province of Riau is IDR 3,030,598.54/month (Pelalawan Regency) and also state on working</p>	
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		<p>agreement letter - "<i>Surat Perjanjian Kerjasama</i>", i.e: Working Agreement Letter on behalf of Mr. Sugito (as Harvester) at Jaya Makmur Cooperative dated 3 June 2022. Determining of wages, state on Article 2; Upah Atau Imbalan: The Wages/benefits is given monthly are calculated based on Rp/kg of FFB harvested per rotation, amounting to IDR 150-180 per kg of FFB, working for 5-6 hours per day (starting at 07.00 - 14.00).</p> <p>Meanwhile, for fertilizer sowing workers, the work agreement is stipulated at IDR 250 per Kg of fertilizer, except for Borate fertilizer at IDR 12,500 per sack. Whereas for fertilizer application, determine in a work agreement is IDR 250 per kg fertilizer except for Borate fertilizer IDR 12,500 per sack/bag.</p> <p>Payment of harvest wages is done hand over payment in the form of payment receipts from farmers (Farmer Groups) directly to the harvesters, sample taken:</p> <ul style="list-style-type: none"> • Harvesters on behalf of Ngadino for the harvest on Junaidi field on period June 2022, for harvesting FFB: 3 rotation : 4100 kg FFB with wages of IDR 180 per kg, total wages of IDR 738,000 • Harvesters on behalf of Sarman for the harvest on Sunardi field period May 2022, for harvesting FFB: 3 rotation : 3350 kg FFB with wages of IDR 170 per kg, total wages of IDR 569,500. 	
6.2.2	<p>(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed.</p>	<p>PT Inti Indosawti Subur – Buatan Group have established work agreement for permanent employees through joint work agreement (PKB-Perjanjian Kerja Bersama) in term for 2 years. During the audit the PKB is for period of 2018 – 2020 and has done registered by Dirjen PHI/JSK the Ministry of Manpower on 4 July 2018. The renewal of PKB or working agreement for 2021 – 2023 are still under process of approval and registration to Ministry of Manpower. According the provisions in the PKB it is stated that if the new PKB is not yet available, the old PKB is still valid to be used as a reference. The company has set employment provisions in accordance with the rules and legal requirement. It is stated on employment contract off daily labour</p>	Complied

		<p>on article 1 about the types of work, working hours (maximum 40 hours per week and working from Monday to Saturday) and the wages has provides is based on waging regulation (Decree of Governor of Riau) in effect at January 2020. Statements about wages, stated in PKB in Article V concerning Wages-Upah; stated: <i>"Pekerja harian Tetap dan Pekerja Bulanan diberi upah berupa uang yang ditetapkan berdasarkan kesepakatan bersama dengan BKS-PPS dengan PD.FSP.PP-SPSi Propinsi yang bersangkutan sesuai dengan peraturan perundangan Otonomi Daerah yang berlaku, yaitu upah uang ditambah beras pekerja senilai/sejumlah 15 Kg (Upah BKS-PPS), dengan mengingat situasi ekonomi dan kemampuan perusahaan"</i>.</p> <p>Determination of wages (including benefits and other benefit/premium), working hours (including hours and overtime pay) and working days have been regulated in the PKB Period 2018-2020 in Article V; <i>Upah - Wages</i>, which explains:</p> <ul style="list-style-type: none"> a) Permanent workers are given wages, the value of which is determined by the employer on the condition that it is not lower than government regulations. b) Certain permanent workers are given wages (Basic Salary and Rice) in accordance with the status of the group/level whose value is determined by the employer with provisions not lower than government regulations c) Permanent workers receive additional wages (UMP/UMSK) and / or attendance incentives as stipulated further in separate provisions. <p>Rice allowance is: 9 kg and each anal (maximum 3 children) is given 7.5 kg per month, which consists of the basic salary and rice allowance. Rice supply is given once a month. Rice supply is intended to be of good quality and is considered appropriate for the health of the Worker and the gift is linked to attendance.</p> <p>Provisions on holidays and leave (both maternity leave and menstruation leave) have been regulated in Article VIII regarding Non-working Days;</p>	
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		<p>including: absenteeism, rest days of the week, official holidays, annual leave, maternity leave and others.</p> <p>The certification holder has made a salary slip for his employees, which is explained in detail, including: basic wages, fixed and premium (harvest and non-harvest) allowances, overtime pay, health and retirement benefits, and deductions that include contributions of labor security and health insurance.</p> <p>Based on document review during ASA 2.1 year 202, that Buatan I Estate and Buatan I Mill have applied the wages of their employees in line with Law No. 13 of 2003 on Employment.</p> <p>The employment contracts and related documents detailing payments and conditions of employment has complied with Collective Labour Agreement. Sample seen: Perjanjian Kerja Harian Lepas – Daily worker agreement No. 21/PKHL/KBN/III/2022 on behalf of R*sj*d dated 2 March 2022.</p> <p>Scheme Smallholder</p> <p>The application of employee harvest and fertilizer wages in Plasma Buatan I is based on Decree of Gubernur Riau No. Kpts. 1272/XI/2021”, dated 20/11/2021 for Upah Minimum Kabupaten/Kota in Province of Riau is IDR 3,030,598.54/month (Pelalawan Regency) and also state on working agreement letter - “<i>Surat Perjanjian Kerjasama</i>”, i.e: Working Agreement Letter on behalf of Mr. Ngadino (as Harvester) at Jaya Makmur Cooperative dated 3 June 2022. Determining of wages, state on Article 2; Upah Atau Imbalan: The Wages/benefits is given monthly are calculated based on Rp/kg of FFB harvested per rotation, amounting to IDR 150-180 per kg of FFB, working for 5-6 hours per day (starting at 07.00 - 14.00).</p> <p>Meanwhile, for fertilizer sowing workers, the work agreement is stipulated at IDR 250 per Kg of fertilizer, except for Borate fertilizer at IDR 12,500 per sack. Whereas for fertilizer application, determine in a work agreement is IDR 250 per kg fertilizer except for Borate fertilizer IDR 12,500 per sack/bag.</p>	
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		<p>Payment of harvest wages is done hand over payment in the form of payment receipts from farmers (Farmer Groups) directly to the harvesters, sample taken:</p> <ul style="list-style-type: none"> • Harvesters on behalf of Ngadino for the harvest on Junaidi field on period June 2022, for harvesting FFB: 3 rotation : 4100 kg FFB with wages of IDR 180 per kg, total wages of IDR 738,000 • Harvesters on behalf of Sarman for the harvest on Sunardi field period May 2022, for harvesting FFB: 3 rotation : 3350 kg FFB with wages of IDR 170 per kg, total wages of IDR 569,500. <p>Based on the sample pay slip above, that Buatan I Estate and Buatan I Mill have applied the wages of their employees in line with Law No. 13 of 2003 on Employment.</p>	
6.2.3	<p>(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, and other legal labour requirements.</p>	<p>The company have established work agreement for permanent employees through joint work agreement (PKB-Perjanjian Kerja Bersama) in term for 2 years. During the audit the PKB is for period of 2018 – 2020 and has done registered by Dirjen PHI/JSK the Ministry of Manpower on 4 July 2018. The renewal of PKB or working agreement for 2021 – 2023 are still under process of approval and registration to Ministry of Manpower. According the provisions in the PKB it is stated that if the new PKB is not yet available, the old PKB is still valid to be used as a reference.</p> <p>The company has set employment provisions in accordance with the rules and legal requirement. It is stated on employment contract off daily labour on article 1 about the types of work, working hours (maximum 40 hours per week and working from Monday to Saturday) and the wages has provides is based on waging regulation (Decree of Governor of Riau) in effect at January 2020. Statements about wages, stated in PKB in Article V concerning Wages-Upah; stated: <i>"Pekerja harian Tetap dan Pekerja Bulanan diberi upah berupa uang yang ditetapkan berdasarkan kesepakatan bersama dengan BKS-PPS dengan PD.FSP.PP-SPSi Propinsi yang bersangkutan sesuai dengan peraturan perundangan Otonomi Daerah"</i></p>	Complied

		<p><i>yang berlaku, yaitu upah uang ditambah beras pekerja senilai/sejumlah 15 Kg (Upah BKS-PPS), dengan mengingat situasi ekonomi dan kemampuan perusahaan”.</i></p> <p>Determination of wages (including benefits and other benefit/premium), working hours (including hours and overtime pay) and working days have been regulated in the PKB Period 2018-2020 in Article V; <i>Upah - Wages</i>, which explains:</p> <ul style="list-style-type: none"> a) Permanent workers are given wages, the value of which is determined by the employer on the condition that it is not lower than government regulations. b) Certain permanent workers are given wages (Basic Salary and Rice) in accordance with the status of the group/level whose value is determined by the employer with provisions not lower than government regulations c) Permanent workers receive additional wages (UMP/UMSK) and / or attendance incentives as stipulated further in separate provisions. <p>Rice allowance is: 9 kg and each anal (maximum 3 children) is given 7.5 kg per month, which consists of the basic salary and rice allowance. Rice supply is given once a month. Rice supply is intended to be of good quality and is considered appropriate for the health of the Worker and the gift is linked to attendance.</p> <p>Provisions on holidays and leave (both maternity leave and menstruation leave) have been regulated in Article VIII regarding Non-working Days; including: absenteeism, rest days of the week, official holidays, annual leave, maternity leave and others.</p> <p>The certification holder has made a salary slip for his employees, which is explained in detail, including: basic wages, fixed and premium (harvest and non-harvest) allowances, overtime pay, health and retirement benefits, and deductions that include contributions of labor security and health insurance.</p> <p>Documents verified: Payslip month April 2022, such as: Mr. S*k*r*n* (BHL-Daily worker) – in Buatan I POM, working day: 20 days</p>	
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		<ul style="list-style-type: none"> • Basic salary IDR 3,030,598 • Process premium IDR - • Deductions: IDR 102,424 (including Payment of BPJS Kesehatan and Ketenagakerjaan) • Total take home pay: IDR 2,048,480 <p>Mr. T*g*h (BHL- Daily worker) – in Buatan I Estate, working day: 18 days</p> <ul style="list-style-type: none"> • Basic salary IDR 3,030,598 • Process Premium IDR - • Deductions: IDR 102,424; (including Payment of BPJS Kese and Ketenagakerjaan) • Total take home pay: IDR 1,843,632 <p>Mr. J*l**n* (SKUH-Fixed worker at ICS Officer), working day: 25 days</p> <ul style="list-style-type: none"> • Basic salary IDR 3,030,598 • Fringe Benefits IDR 579,200 • Premium IDR 400,000 • Deductions: IDR 120,677; (including Payment of BPJS Kese and Ketenagakerjaan) • Total take home pay: IDR 3,907,374 <p>Based on the sample pay slip above, that Buatan I Estate and Buatan I Mill have applied the wages of their employees in line with Law No. 13 of 2003 on Employment and regulated at PKB</p>	
6.2.4	<p>(C) The unit of certification provides adequate housing. Sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.</p>	<p>Buatan I POM and Estate: PT Inti Indosawit Subur – Buatan I Group has provided adequate housing, water supplies, medical, educational and welfare amenities to national standards or above. The facilities provided by PT Inti Indosawit Subur – Buatan Group, updated in May 2022, such as:</p>	Complied

		<ul style="list-style-type: none"> • Housing complex (399 units); • Elementary (1 unit) and kindergarden (1 units); • Polyclinic (1 unit); • Mosque (2 units); • Church (1 unit); • Creche (1 units); • School bus (2 units); • Ambulance (1 unit); <p>PT Inti Indosawit Subur has also prepared budget for employee housing improvements every year. The budget has been distributed based on cash flow / detailing every month for a year.</p> <p>The company has also provided clean water for MCK (<i>Mandi Cuci Kakus</i> - not for drink) that is sourced from underground wells and has complied with applicable regulatory standards. The provision of electricity for employee housing is provided by using electricity connections from the government (PLN - <i>Perusahaan Listrik Negara</i>).</p> <p>During onsite visit (at ASA 2.1 – 2022) to workers compound at Buatan I POM and Buatan Estate all workers facilities was provide by the company freely.</p> <p>Scheme Smallholders:</p> <p>All workers in Plasma Buatan has own house with water and electricity supplies from government (PLN). Based on interview with smallholder in explained that the worker has their own house in the village, and they are satisfied with the condition.</p>	
6.2.5	The unit of certification makes efforts to improve workers’ access to adequate, sufficient and affordable food.	Buatan I POM and Estate:	Complied

		<p>PT Inti Inti Indosawit Subur – Buatan Group has demonstrated an effort to improve worker’s access to adequate, sufficient and affordable food.</p> <p>The company provides minimarket which managed by the cooperative and traditional market is nearby surrounding company area, mostly goods needed by employees is provided by the minimarket and cooperative. Price in minimarket and cooperative was affordable and cheaper than traditional market nearby company area. Price control by cooperative and all member including workers and company management.</p> <p>Scheme smallholders:</p> <p>There is a market in the village where smallholder workers stay. Access road and the availability of foods and other basic needs was easy to found with competitive price/affordable. Price determined by the market and control by government.</p>	
6.2.6	<p>A DLW is paid to all workers in accordance with applicable regulations, including workers who work on a piece rate/quota basis, the calculation of which is based on a quota that can be achieved during regular working hours.</p>	<p>Buatan I POM and Estate:</p> <p>Determination of wage for period 2022 is based on Decree of Gubernur Riau No. Kpts.1272/XI/2021”, dated 20/11/2021 for Upah Minimum Kabupaten/Kota in Province of Riau is IDR 3,030,598.54/month (Pelalawan Regency).</p> <p>The Company has already set wage standard based on wages set by the government recorded on Memorandum no. 048/HR-R02/MEMO/IV/2022, dated 30 April 2022; regarding: “Kenaikan Upah Pekerja Golongan SKUB on Period 2022” and also the determination of the daily wage for BHL (Daily workers) and PKWT employees (certain time workers) see 6.2.1 above. The company is also gives a scripts/slip salary to employees before salary is given, salary slip also contains basic salary, allowances, premium, labor health coverage (BPJS Tenaga kerja and Kesehatan) and deduction.</p> <p>The company also made calculations related to DLW on period 2022, based on the wages given to employees as costs given by the company:</p>	Complied

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		In Kind Benefits	SKU	PHL	Total Kebun
Housing (Cost of Building :30 years)+(Annual Maintenance:Number of houses):12 Months			262.357	262.357	262.357
Electricity & Water (Annual Cost of Water & Electricity ÷ Number of Houses) ÷ 12 months			61.435	61.435	61.435
Education [(total costs not including teacher and non teacher labour costs + school transport + school building maintenance + food for children ÷ Number of Workers] ÷ 12 months			74.284	74.284	74.284
Creche Facilities (TPA) (building maintenance + food for children +supplies+ Caretaker costs) ÷ Number of Workers			13.959	13.959	13.959
Healthcare (Kesehatan) (maintenance of clinic, medicines & medical materials, ambulance transport costs + Cost of Healthcare Workers) ÷ Number of Workers			465	465	465
Transport					
Clothing					
Food			261.027	7.845	120.567
Sport & Recreation Fac.			3.446	3.446	3.446
Total Cost of In Kind Benefits			676.973	423.791	536.512
Average Monthly Take Home Salary per Worker			3.080.309	1.874.623	2.587.593
Total Value of Prevailing Wage			3.757.282	2.298.414	3.124.105

Scheme Smallholder:
 Calculation of DLW Cooperative employees period 2022, DLW Calculation of Family Workers (K-3) KUD

No.	Type of Cost	Value (IDR)	Remarks
1	Food Cost	Rp 2.107.875,00	
2	Housing Cost	Rp 1.371.014,00	
3	Non Food Non Housing Cost	Rp 2.381.458,00	
	Sub Total	Rp 5.860.347,00	
5	Total Living Basket	Rp 6.253.365,00	> 5%
6	FTE	Rp 1,04	
7	Net Living Wage	Rp 5.916.697,00	
8	Mandatory deduction	Rp 279.363,00	
	Gross DLW	Rp 6.196.061,04	

Piece rate/quotas calculation has been calculated based on the achievement of 7 working hours in accordance with applicable regulations (UU No. 11/2021), for example:

		<p>Calculation of labor harvest in Plasma:</p> <ul style="list-style-type: none"> • Ability to harvest power for 7 hours per day: 3,000 kg • Harvest area: 4 hectares • Job performance in 1 hour 429 kg / hour • Basic wages Based on the provisions of Prov. Riau: IDR. 120,800 per day • Price of harvest: IDR. 40 / kg • Price per hectare: IDR. 30,200 per Ha • Actual Harvest Costs (currently in effect): IDR 200 / Kg • There is a gap of: 273% positive. <p>Calculation of fertilizer labor piece rate:</p> <ul style="list-style-type: none"> • The ability to sow fertilizer for 7: 600 kg • Tonnage per hour: 86 Kg / hour • Basic wages Based on the provisions of Prov. Riau: IDR. 120,800 per day • Fertilizer wages: IDR. 201 / Kg • Actual fertilization wages (valid now): IDR. 200 / kg • There is a gap of: 0.66% positive. 	
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PROCEDURAL NOTE:

The RSPO has published guidelines on the calculation of Decent Living Wage (DLW) in June 2019. Since Indonesia does not have DLW benchmark yet, the RSPO Secretariat will conduct a DLW benchmark study in accordance with the Global Living Wage Coalition (GLWC) and Indonesian laws and regulations.

In the meantime, until DLW benchmark for Indonesia is endorsed by the RSPO, the unit of certification carries out interim measures that was published by RSPO (dated 11 November 2019), including:

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

Once the DLW benchmark is available, this procedural note is no longer applicable.		
6.2.7	<p>Permanent fulltime employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal</p>	<p><u>Buatan I Estate (KBN)</u></p> <p>Based on the analysis of the needs of workers at Buatan I Estate as of May 2022, they are as follows:</p> <ol style="list-style-type: none"> 1. Up to 2027 Buatan I Estate has an area of 1937 Ha. 2. Using a harvester ratio of 0.06 Hk/Ha, so there is a need for harvesters until 2025 as many as: 116 harvesters 3. Condition of harvesters until May 2022 as many as 109 harvesters, with details as follows: <ul style="list-style-type: none"> • SKU harvester: 29 workers • PHL harvesters: 80 workers <p>Buatan I Estate has appointed PHL harvesters to become SKUH in the period January – December 2021 based on Memorandum no. 280/HR-RO2/MEMO/SK/10/2021 dated October 23, 2021 as many as 7 harvesters.</p> <p>So that Buatan I Estate compiled a PHL-SKU Appointment/Promotion Program until 2025 as many as 80 harvesters. This promotion program has been signed by the Pelalawan District Manpower Office</p> <ol style="list-style-type: none"> 1) Appointment plan for Semester I 2022: Based on Memorandum No. No. 004/HR-RO2/MEMO/SK/01/2022 dated 25 January 2022 as much as 11 harvesters 2) Furthermore, the plan for the appointment of 69 harvesters (80-11 harvesters) per year until 2025 is as follows: <ul style="list-style-type: none"> • Semester II/2022: total: 15 harvesters; would be appointed on November-December 2022 • Semester I and II in 2023 as many as 18 harvesters • Semester I and II in 2024 as many as 18 harvesters

		<ul style="list-style-type: none"> Semester I and II of 2025 as many as 18 harvesters <p>The program that, after 2025 in Buatan Estate there will be no harvesters with PHL status (daily workers).</p> <p><u>Buatan I POM</u></p> <p>Based on the analysis of the need for workers until May 2022 in the Buatan POM I, there are 114 workers for a factory capacity of 60 tons per hour. The actual number of employees as of May 2022 is: 144 workers with details:</p> <ul style="list-style-type: none"> SKU of 119 workers PHL as many as 35 workers <p>The realization of the appointment of PHL employees to become SKUs in the period Jan-April 2022 is 1 person: Based on Memorandum No. 162/HR-RO2/MEMO/SK/04/2022 dated 26 April 2022 on behalf of Sthepanie R. Rizki Sitinjak.</p> <p>The proposal for the appointment of PHL employees to become SKUs in the SM I/2022 period was 15 workers, based on Memorandum No. 075/MI-PBS/MEMO/IV/2022 dated April 12, 2022.</p> <p>So that until May 2022 there are still 20 PHL employees (35-15 workers). So that Buatan I POM compiled a PHL-SKU Appointment/Promotion Program until 2023 as many as 20 workers. This promotion program has been signed by the Pelalawan District Manpower Office</p> <p>PBS has prepared a program for the appointment of PHL employees to become SKUs from SM II/2022 to 2023. The details are as follows:</p>	
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		<ul style="list-style-type: none"> • On Semester II/2022 as many as 7 people; would be appointed on November-December 2022. • On Semester I/2023 as many as 7 people • On Semester II/2023 as many as 6 people <p>So, in 2023 period, there will be no workers with PHL status. Meanwhile, if there is a recruitment, it will refer to the recruitment of permanent workers with a probationary period of 3 months which will then be evaluated so that they can be proposed to become permanent workers in SKUH.</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>			
6.3.1	<p>(C) A published statement recognizing freedom of association and right to collective bargaining in national languages is available and is explained to all workers in languages that they understand, and is demonstrably implemented.</p>	<p>Buatan I POM and Estate:</p> <p>Freedom of association policy, dated 01 December 2019, written in Bahasa Indonesia, this policy has been informed to all employees and being placed into public area easily accessed. The freedom to gather and form associations is listed in the Company Policy at point 16: <i>...Perusahaan menghormati hak setiap karyawan untuk membentuk atau menjadi anggota serikat pekerja sesuai dengan keinginannya dan untuk melakukan tawar menawar secara kolektif."</i></p> <p>The company's policy is also published to use posters at any strategic places in the plantations (Buatan Estate and Mill). Corporate policy has been socialized/disseminated to all levels of PT Inti Indosawit Subur – Buatan Group employees on 10-12 February 2022 (list of participants can be shown) and on stakeholders (including local contractors) on 23-24 March 2022 which was attended by 25 stakeholders. Evidence of socialization can be shown during audit.</p> <p>PT Inti Indosawit Subur – Buatan Group has established a Labor Union in accordance with the Decision Letter of PC-F.SPPP SPSI of Pelalawan Regency No. Kep-24/MUSNIK-SP.PP/SPSI/PT.IIS/05/2015, dated 26 April</p>	Complied

2015 regarding "Pengesahan komposisi dan Personalia Pengurus Unit Kerja Serikat Pekerja Pertanian dan Perkebunan Serikat Pekerja Seluruh Indonesia PT Inti Indosawit Subru Masa Bakti 2015-2020", and has been registered with the Manpower Office of Pelalawan Regency. 255/DTK-PEN/2018/08 dated 31 July 2018 and valid until 31 July 2021 Chaired by Walim Waluyan and Denny Andri Anno as secretarist.

Scheme Smallholder:

Manager of Kebun Plasma Buatan has established the ICS Policy under "Kebijakan Group Manager" for example: In KUD Bhakti Mandiri was established on 20 February 2022, in KUD Jaya Makmur was set on 22 February 2022, in KUD Sumber Rezeki was set on 27 February 2022 and also in KUD Sejahtera was set on 18 February 2022, that was signed by Manajer Group ICS Buatan, in point 9 was mentioned "Menghormati HAM, serta keterwakilan tanpa memandang suku, kasta, asal negara, agama/kepercayaan, cacat, jender, orientasi seksual, keanggotaan serikat pekerja, afiliasi politik dan atau umur" – to treat all member of cooperative in fair manner, and respect human rights, and representative without any discrimination on tribe, race, caste, country of origin, religion/belief, disability, gender, sexual orientation, union affiliation, political affiliation or age.

This policy was socialized by the KUD/Cooperative each to all members, partners, and surrounding communities, i.e in KUD Bhakti Mandiri was conducted on 4 March 2022, in KUD Jaya Makmur was set on 6 March 2022, in KUD Sumber Rezeki was set on 8 March 2022 and in KUD Sejahtera was set on 9 March 2022.

The policy is also written in their farmer handbook "Buku Panduan Petani". The implementation of said policy in form of dissemination of anti-corruption policy, transparency in expenditure for road maintenance, fair calculation of worker payment, good quality FFB.

6.3.2	Minutes of meetings between the unit of certification with trade unions or worker representatives who are freely elected, are documented in the national languages and available upon request.	<p>Based on an interview with the chairman of the Buatan I Mill that in terms of establishing the organizational structure of the management of PT Inti Indosawit Subur - Made by the Group does not interfere and influence. Trade unions can freely recruit members and as a sign of membership, trade unions also provide membership cards.</p> <p>Labour Union regularly holds meetings, for example a meeting on 19-22 February 2022 to discuss progress the registration the new Collective Labour Agreement (PKB).</p> <p>Up to May 2022, Labour Union (SPSI) has 267 members consisting of employees of Buatan I Estate and POM. Based on an interview with the chairman of the Buatan I Estate and Mill (Mr. Walin Waluyan) that in terms of establishing the organizational structure of the management of PT Inti Indosawit Subur – Buatan.</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>Buatan I POM and Estate:</p> <p>PT Inti Indosawit Subur – Buatan Group has company policy signed by Managing Director on 01/12/2014. The policy stated company guarantee freedom of association or be part of worker union as well as collective bargaining.</p> <p>Labour Union regularly holds meetings, for example a meeting on 19-22 February 2022 to discuss progress the registration the new Collective Labour Agreement (PKB).</p> <p>Up to May 2022, Labour Union (SPSI) has 267 members consisting of employees of Buatan I Estate and POM. Based on an interview with the chairman of the Buatan I Estate and Mill (Mr. Walin Waluyan) confirmed the Management does not interfere with the formation or operation of registered labour organizations/unions</p>	Complied
<p>Criteria 6.4: Children are not employed or exploited.</p>			

<p>6.4.1</p>	<p>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>	<p>PT Inti Indosawit Subur has established Company Policy dated 1 December 2019, that stated there is not allowed all children to work in every activities/processes in company. This policy has been socialization to all worker and contractor on 17-21 February 2020. It stated on Company policy on point 14; "Prohibit children from working in any company activities".</p> <p>PT Inti Indosawit Subur – Buatan Group, also put in place a policy related to the prohibition of child labor (under 18 years), on the document of the FFB Supplier Statement and Guarantee in point 12; "Do not employ children (under 18 years) which as prohibited by Law no. 13/2003.</p> <p>PT Inti Indosawiti Subur – Buatan Group demonstrates the profile of all workers and the youngest worker updated in May 2022 was Mr I*h*m Akb*r dated of birth on 1 December 2020 – started work on 1 April 2021 (20 years old).</p> <p>Scheme Smallholder:</p> <p>Plasma Buatan I have established policies related to the prohibition of employing children (under 18 years old). for example: In KUD Bhakti Mandiri was established on 20 February 2022, in KUD Jaya Makmur was set on 22 February 2022, in KUD Sumber Rezeki was set on 27 February 2022 and also in KUD Sejahtera was set on 18 February 2022, that was signed by Manajer Group ICS Buatan, explained in point 10; It is forbidden to employ children under the age of 18 in every plantation operational activity".</p> <p>Based on document review (list of employees) updated in May 2022 for each KUD's, e.g. KUD Bhakti Mandiri, KUD Jaya Makmur, KUD Sumber Rezeki, KUD Sejahtera, the youngest worker updated in May 2022 was Mr S*k8rn**, dated of 16 August 1998 – started work on 1 July 2021 (23 years old)</p>	<p>Complied</p>
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<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>PT Inti Indosawit Subur has established Company Policy dated 1 December 2019, that stated there is not allowed all children to work in every activities/processes in company. This policy has been socialization to all worker and contractor on 17-21 February 2020. It stated on Company policy on point 14; “Prohibit children from working in any company activities”.</p> <p>PT Inti Indosawit Subur – Buatan Group, also put in place a policy related to the prohibition of child labor (under 18 years), on the document of the FFB Supplier Statement and Guarantee in point 12; "Do not employ children (under 18 years) which as prohibited by Law no. 13/2003.</p> <p>PT Inti Indosawiti Subur – Buatan Group demonstrates the profile of all workers and the youngest worker updated in May 2022 was Mr I*h*m Akb*r dated of birth on 1 December 2020 – started work on 1 April 2021 (20 years old).</p> <p>Scheme Smallholder:</p> <p>Plasma Buatan I have established policies related to the prohibition of employing children (under 18 years old). for example: In KUD Bhakti Mandiri was established on 20 February 2022, in KUD Jaya Makmur was set on 22 February 2022, in KUD Sumber Rezeki was set on 27 February 2022 and also in KUD Sejahtera was set on 18 February 2022, that was signed by Manajer Group ICS Buatan, explained in point 10; It is forbidden to employ children under the age of 18 in every plantation operational activity”.</p> <p>Based on document review (list of employees) updated in May 2022 for each KUD’s, e.g. KUD Bhakti Mandiri, KUD Jaya Makmur, KUD Sumber Rezeki, KUD Sejahtera, the youngest worker updated in May 2022 was Mr S*k*rn**, dated of 16 August 1998 – started work on 1 July 2021 (23 years old)</p>	<p>Complied</p>
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<p>6.4.3</p>	<p>(C) Young person maybe employed only for non-hazardous work with protective restrictions in place for that work.</p>	<p>Buatan I POM and Estate:</p> <p>PT Inti Indosawit Subur has established Company Policy dated 1 December 2019 that stated there is not allowed all children to work in every activities/processes in company. It stated on Company policy on point 14; "Prohibit children from working in any company activities".</p> <p>The company's policy is also published to use posters at any strategic places in the plantations (Buatan Estate and Mill). Corporate policy has been socialized/disseminated to all levels of PT Inti Indosawit Subur – Buatan Group employees on 10-12 February 2022 (list of participants can be shown) and on stakeholders (including local contractors) on 23-24 March 2022 which was attended by 25 stakeholders. Evidence of socialization can be shown during audit.</p> <p>Document verification and interviews with several workers were carried out, that the workers who were relatively young were not employed directly related to hazardous work or were still being supervised by older and experienced workers. Protection of workers is always carried out by using PPE, especially in hazardous work in accordance with hazard identification.</p> <p>Certificate holders - PT Inti Indosawit Subur – Buatan Group, also put in place a policy related to the prohibition of child labor (under 18 years), on the document of the FFB Supplier Statement and Guarantee in point 12; "Do not employ children (under 18 years) which as prohibited by Law no. 13/2003.</p> <p>Sample of the youngest workers – during Asa 2.1 – year 2022, is the following:</p> <ul style="list-style-type: none"> - Buatan Estate - Employees on behalf Gunawan; born on 31/12/2003 joined work on 01/08/2021 at the age of 18 years and 7 months. - Buatan I POM - Employees on behalf Atik Setiadi.; born on 06/04/2001, joined work on 01/08/2021 at the age of 20 years and 4 months. 	<p>Complied</p>
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		<p>Based on the sample above, verification is carried out with a photocopy of the ID card of each worker, it is proven that the age of the worker is appropriate and at work entry is at the age of > 18 years in accordance with the applicable laws and regulations.</p> <p>Scheme Smallholder: Plasma Buatan I have established policies related to the prohibition of employing children (under 18 years old), for example: In KUD Bhakti Mandiri was established on 20 February 2022, in KUD Jaya Makmur was set on 22 February 2022, in KUD Sumber Rezeki was set on 27 February 2022 and also in KUD Sejahtera was set on 18 February 2022, that was signed by Manajer Group ICS Buatan, explained in point 10; It is forbidden to employ children under the age of 18 in every plantation operational activity". This policy was disseminated to all members on 14 February 2022. Based on document review (list of employees) of KUD Sumber Rejeki and KUD Jaya Makmur, there were found that a minimum age are met (the youngest of harvester born year 1996 – based on ID verification).</p>	
6.4.4	<p>The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.</p>	<p>Buatan I POM and Estate: PT Inti Indosawit Subur – Buataan I POM has established a policy to prevent sexual and all other forms of harassment and violence as in "Kebijakan Perusahaan" that was signed by Managing Director dated 1st December 2019, in point 15; "To prevent any sexual or physical abuses happen to women as well as to protect their reproductive rights". The company's policy is also published to use posters at any strategic places in the plantations (Buatan Estate and Mill). Corporate policy has been socialized/disseminated to all levels of PT Inti Indosawit Subur – Buatan Group employees on 10-12 February 2022 (list of participants can be shown) and on stakeholders (including local contractors) on 23-24 March 2022 which was attended by 25 stakeholders. Evidence of socialization can</p>	Complied

		<p>be shown during audit.</p> <p>Scheme smallholder: Manager of Kebun Plasma Buatan has established the Policy under "Kebijakan Group Manager" that mentioned 'no child labour' and the negative effects of child labour. The policy verification: In KUD Bhakti Mandiri was established on 20 February 2022, in KUD Jaya Makmur was set on 22 February 2022, in KUD Sumber Rezeki was set on 27 February 2022 and also in KUD Sejahtera was set on 18 February 2022, that was signed by Group Manager ICS Buatan, point 6 stated "Mencegah pelecehan seksual dan berbagai bentuk kekerasan terhadap perempuan". This policy was socialized by the KUD/Cooperative each to all members, partners, and surrounding communities</p>	
<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>Buatan I POM and Estate: PT Inti Indosawit Subur – Buataan I POM has established a policy to prevent sexual and all other forms of harassment and violence as in "Kebijakan Perusahaan" that was signed by Managing Director dated 1st December 2019, in point 15; "To prevent any sexual or physical abuses happen to women as well as to protect their reproductive rights". The company's policy is also published to use posters at any strategic places in the plantations (Buatan Estate and Mill). Corporate policy has been socialized/disseminated to all levels of PT Inti Indosawit Subur – Buatan Group employees on 10-12 February 2022 (list of participants can be shown) and on stakeholders (including local contractors) on 23-24 March 2022 which was attended by 25 stakeholders. Evidence of socialization can be shown during audit.</p>	Complied

		<p>Scheme smallholder: Manager of Kebun Plasma Buatan has established the Policy under “Kebijakan Group Manager”, that mentioned to prevent sexual and all other form of harassment and violence. Policy document verification: In KUD Bhakti Mandiri was established on 20 February 2022, in KUD Jaya Makmur was set on 22 February 2022, in KUD Sumber Rezeki was set on 27 February 2022 and also in KUD Sejahtera was set on 18 February 2022, that was signed by Group Manager ICS Buatan, point 6 stated “Mencegah pelecehan sexual dan berbagai bentuk kekerasan terhadap perempuan”. This policy was socialized by the KUD/Cooperative each to all members, partners, and surrounding communities</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>Buatan I POM and Estate: PT Inti Indosawit Subur – Buatan I POM has established a policy, related to protect the reproductive rights “Kebijakan Perusahaan” that was signed by Managing Director dated 1st December 2019, in point 15; “To prevent any sexual or physical abuses happen to women as well as to protect their reproductive rights”. The company's policy is also published to use posters at any strategic places in the plantations (Buatan Estate and Mill). Corporate policy has been socialized/disseminated to all levels of PT Inti Indosawit Subur – Buatan Group employees on 10-12 February 2022 (list of participants can be shown) and on stakeholders (including local contractors) on 23-24 March 2022 which was attended by 25 stakeholders. Evidence of socialization can be shown during audit. Based on the PKB: Collective Labor Agreement for the period 2018 - 2020, the company has granted rights to female workers related to the protection of their reproductive rights, in the PKB Article IV document; Working hours</p>	Complied

		<p>at point 6: Entrepreneurs are prohibited from associating with pregnant women who according to doctors for the health and safety of their wombs and themselves, they work between 23.00 and 07.00 ". Based on Internal Memorandum No. 325/EST/MEMO/ 01/2020, dated January 6, 2020 from the Buatan Group Manager, related: "Policy regarding doctor's recommendation for female workers who are menstruating experiencing pain not to have to work on the first and second day of menstruation".</p> <p>PT Inti Indosawit Subur – Buatan I POM has kept the record that spraying is not conducted by pregnant or breast-feeding women. The company has been conducting PP Test (pregnant test) every month.</p> <p>The last of pregnancy test conducted in May 2022. All the female sprayer in well condition and not being pregnant nor breast feeding.</p> <p>Scheme smallholder:</p> <p>Manager of Kebun Plasma Buatan has established the Policy under "Kebijakan Group Manager" for example: In KUD Bhakti Mandiri was established on 20 February 2022, in KUD Jaya Makmur was set on 22 February 2022, in KUD Sumber Rezeki was set on 27 February 2022 and also in KUD Sejahtera was set on 18 February 2022, that was signed by Manajer Group ICS Buatan, point 6 stated "Mencegah pelecehan sexual dan berbagai bentuk kekerasan terhadap perempuan".</p> <p>In each cooperative or KUD has also established a Cooperative policy, related to sexual harassment and violence explained in point 11 and 12; 11) "Preventing sexual harassment and various forms of violence against women and protecting their reproduction rights and 12) Give leave rights for female workers who are pregnant, for example: Jaya Makmur, Bahkti Mandiri and Sumber Rejeki Cooperative Policy has been established on 14 February 2020 and was communicated to all members on 14 February 2020.</p>	
6.5.3	Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to	For breastfeeding mothers and had children under 5 years, the company has provided child care (TPA) which is located in each division/Afdeling. In	Complied

	<p>address the needs that have been identified in accordance with applicable regulations in Indonesia.</p>	<p>landfill space as well as the company provides a special space and time for 1 hour for breastfeeding mothers in need time to nursing his baby.</p> <p>The company has also identified the workers as young mothers and conducted consultations through distributing questionnaires on 15 June 2022 to as many as 10 young mothers in Buatan I POM and Buatan I Esatate.</p> <p>From the results of the survey and consultation, management issued several policies, including:</p> <ul style="list-style-type: none"> • Policy for employees who are breastfeeding, based on the Memorandum from the Farm Manager No. 171/ES-IIS/MEMO/ 01/20 dated January 4, 2020, stated: the company guarantees female employees to breastfeed their children during working hours, by giving time and place to all female employees who have babies to breastfeed their children once for 45 minutes: morning at 10.00-10.45 WIB at the clinic or afdeling office or 11.30 - 12.15 WIB. • Periodic checkups at the clinic to monitor the health of the baby by providing POSYANDU services once a month at the Central TPA (Child Care Center) including immunization and vitamins. • The company has provided menstrual leave for female employee in accordance with the recommendation from paramedic in clinic, and this is in line with "Perjanjian Kerja Bersama" and applicable regulations. • The company has granted the right for maternity leave the women who gave birth in accordance with the applicable rules and "Perjanjian Kerja Bersama". • The company has consistently performed pregnancy tests to women workers who worked as a fertilizer and spraying every 1 month. • 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. 	
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<p>6.5.4</p>	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, as long as the complaint is supported with adequate information, is documented, implemented and communicated to all levels of the workforce.</p>	<p>The company has procedure related to complain in document Standard Operating Procedure, No. SOP: XX-HR-308.5-RO; Revision: 0, December 11th 2009: Employees complaints: submission and settlement. Mechanism for complaints management where it needs to protect its confidentiality for complaint submitter was found in company policy's draft as in one of points of this policies stated that:</p> <p><i>"To provide appropriate information for those who inquiry it and to protect its confidentiality for whistle blower cases in accordance to law regarding environmental and social issue, food safety, health and safety work, so that it enables them to more participate to the decision making processes for improving company's performance".</i></p> <p>Policies that have been made by companies related to the protection of women's rights such as;</p> <ol style="list-style-type: none"> a. The company has provided menstrual leave for female employee in accordance with the recommendation from paramedic in clinic, and this is in line with "Perjanjian Kerja Bersama" and applicable regulations. b. The company has granted the right for maternity leave the women who gave birth in accordance with the applicable rules and "Perjanjian Kerja Bersama". c. The company has consistently performed pregnancy tests to women workers who worked as a fertilizer and spraying every 1 month. d. The company has a policy of not hiring female labor during pregnancy or breast-feeding for the kind of work that endanger such as fertilizer or spraying by temporarily moving the work force to other types of work. 	<p>Complied</p>

		<p>e. The company has consistently performed regular health checks for sprayers every six months.</p> <p>The company has conducted training and socialization prevention of sexual harassment in the workplace to the Committee members for example gender socialization on 23 March 2022, on "<i>Sosialisasi Pelecehan Seksual dan Kebijakan Hak Reproduksi</i>", was attended by 14 participants of Buatan I and Buatan Estate.</p> <p>On 2022 Period, Gender Committee Work Program was established including the issues that will be discussed at the meeting, including:</p> <ul style="list-style-type: none"> • Defending and guaranteeing the rights of women workers • Carry out routine immunization of children to mothers who have toddlers • Conduct family health education with environmental cleanliness <p>Realization of Gender committee program on 2022, such as:</p> <p>On February 23 March 2022; socialization to female workers related to the protection of women, children workers and sexual harassment at Buatan I Estate and Buatan I POM was attended by as many as 12 women workers. Socialization to female workers related to the sexual harassment policy on 21 January 2022 was attended by 25 participants.</p> <p>Based on the records of the routine meeting and interviews with management, that during the period 2021-2022 there were no cases related to women workers or the form of harassment to the women workers.</p>	
<p>Criteria 6.6: No forms of forced or trafficked labour are used.</p>			
6.6.1	<p>(C) All work is voluntary and the following are prohibited:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports; • Payment of recruitment fees; • Contract substitution without worker's consent 	<p>Buatan I POM and Estate:</p> <p>Based on document list of employees verification, there was no indication of forced labour, contract substitution and/or human trafficking. All employees have had work agreement, regulating the rights and obligation</p>	Complied

	<ul style="list-style-type: none"> • 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>of company and employee. The work agreement including working hour and salary payment.</p> <p>Based on the overtime warrant, it has been verified that there are no indications of an overtime order being forced, overtime is carried out on the approved order. There is no indication that there are workers who work due to debt bondage, nor are there any fees at the time of employee recruitment. All workers have been determined based on the agreed work contract, if there is a worker who will decide to stop working before the contract period ends, the company will conduct counseling / interview with the employee concerned and the decision taken is based on an agreement between the two parties.</p> <p>Based on document verification and salary payment, shows employee have paid in accordance to minimum wage regulation, as well as verification to the master list of employees April 2022, that there is no use of migrant/foreign/honorary worker.</p> <p>All employee including temporary workers have work agreement; regulating the scope of work, work agreement timeframe, working hour, salary payment, overtime and Jamsostek. Based on verification of master list of employee April 2022, there were no indication of contract substitution occurred. All employees have work agreement, explaining the rights and obligation including scope of work.</p> <p>Data verified, Payslip month April 2022, such as:</p> <p>Mr. S*k*r*n* (BHL-Daily worker) – in Buatan I POM, working day: 20 days</p> <ul style="list-style-type: none"> • Basic salary IDR 3,030,598 • Process premium IDR - • Deductions: IDR 102,424 (including Payment of BPJS Kesehatan and Ketenagakerjaan) • Total take home pay: IDR 2,048,480 <p>Mr. T*g*h (BHL- Daily worker) – in Buatan I Estate, working day: 18 days</p> <ul style="list-style-type: none"> • Basic salary IDR 3,030,598 	
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6.6.2	<p>(C) Where temporary (Specified Time Work Agreement/PKWT) or migrant workers are employed, a specific labour policy and procedures are established and evidence of implementation is available.</p>	<p>Buatan I POM, Estate and Scheme Smallholder: PT Inti Indosawit Subur – Buatan Group uses temporary workers as BHL in Buatan I Estate, Plasma and Buatan I Mill operations. The company has a procedure regarding SOP New Employee Reception No. AA-HR-305.2-R0 dated 1 February 2009, this procedure is a general acceptance of employees (for all employees), but there are no specific procedures and policies regarding BHL or PKWT workers according to the RSPO P&C requirements.</p>	Complied

		<p>Based on list of employee with Specified Time Work Agreement/PKWT updated in May 2022, in Buatan I POM (17 workers), Buatan Estate (116 workers), Plasma Buatan I (4 workers).</p> <p>Perjanjian Kerja Harian Lepas – Specified Time Work Agreement/PKWT No. 21/PKHL/KBN/III/2022 on behalf of R*sj*d dated 2 March 2022. This Daily worker agreement has made duplicate. The letter completed with the name of the employee proposed for appointment, Assessment Results of each employee, Statement letter of each employee, Types of training that have been attended by each employee, Job, and Responsibilities of each employee at the time of appointment.</p>	
<p>Criteria 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.</p>			
6.7.1	<p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p>	<p>PT Inti Indosawit Subur – Buatan I POM has appointed a person who responsible on OHS implementation and monitoring. The safety committee has defined in all estate and POM under P2K3 (Panitia Pembina Keselamatan dan Kesehatan Kerja).</p> <p>Sample seen:</p> <ul style="list-style-type: none"> • Safety committee has defined under "Surat Keputusan Kepala Dinas Tenaga Kerja dan Transmigrasi Propinsi Riau nomor Kep.457/Disnakertrans-PK/SK-P2K3/XII/2021 tentang Pengesahan Panitia Pembina Keselamatan dan Kesehatan Kerja (P2K3) PT Inti Indosawit Subur – Pabrik Buatan, updated on 20th December 2021 • The company has also assigned the person who responsible on OHS expert (AK3- Umum), namely Mr S*n*e*** with license number: No.Reg 5/1595/AS.02.04/II/2021 dated 31st March 2022 valid until 3 years. • Record of monthly meeting (P2K3), sample seen: MoM on 17th May 2022, agenda meeting: review on previous OHS meeting, review of inspection of PPE usage, review on accidents report. 	Complied

		<ul style="list-style-type: none"> • Three months report on OHS performance for period January to March 2022 was sent to Manpower Agency in Pelalawan Regency. <p>Scheme smallholders:</p> <p>Each KUD has established a team who has been responsible on implementation and implementation the OHS program. Based on interview during onsite audit, there was confirmed that smallholder’s cooperative has established a team who has been responsible on implementation of OHS.</p>	
6.7.2	<p>Accident and emergency procedures in Indonesian language are in place and clearly understood by all workers. Assigned operatives trained in first aid are present in both field and other operations. First aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p>	<p>PT Inti Indosawit Subur – Buatan I POM has defined the procedure for emergency response under Standar Operatonal Procedure – Environmental Field Procedure, such as:</p> <ul style="list-style-type: none"> • Nomor AA-KL-11-EFP tentang Penanganan Tumpahan di Laboratorium • Nomor AA-KL-14-EFP tentang Pengendalian Kebakaran Lahan • Nomor AA-KL-16-EFP tentang Pengendalian Tumpahan B3 dan Limbah B3 • Nomor AA-KL-17-EFP tentang Pengendalian Ledakan Boiler, Tabung Gas dan Lainnya • Nomor AA-KL-18-EFP tentang Pengendalian Gempa Bumi, Banjir dan Tanah Longsor • Nomor AA-KL-19-EFP tentang Tanggap Darurat Kabut Asap <p>PT Inti Indosawit Subur – Buatan I POM has also prepared the procedure on work accident under “Standard Operasioanl Prosedur – Investigasi Kecelakaan Kerja nomor AA-SMK3-18001.02-R0”, revision 0 dated 1st April 2018.</p> <p>Data verified during ASA 2.1 – May 2022, such as:</p> <ul style="list-style-type: none"> • Monitoring of emergency response and preparedness facilities, i.e: fire hydrant (8 units) and fire extinguisher (14 units), updated in March 2022, location in Buatan I POM. 	Complied

		<ul style="list-style-type: none"> Regular emergency response drill conducted on 21 March 2022. The Fire Drill activity attended by 36 participants (workers and staff at Mill). The activity includes Fire Brigade Response, Evacuation to Assembly Point, First Aid Response and Victims Evacuation. Total duration of actual response during Fire Drill is 13 minutes. 	
6.7.3	<p>(C) Workers use appropriate personal protective equipment (PPE) which is provided free of charge to all workers in the workplace, to cover all potentially hazardous operations, such as pesticides application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p>	<p>PT Inti Indosawit Subur – Buatan I POM has demonstrated the record of realization the OHS program 2020 including use appropriate personal protective equipment (PPE) which is provided free of charge to all workers in the workplace, to cover all potentially hazardous operations, such as pesticides application, machine operations, land preparation, and harvesting.</p> <p>PT Inti Indosawit Subur – Buatan I POM has demonstrated the record of realization the OHS program 2022, such as:</p> <ul style="list-style-type: none"> Report of MCU for all workers in Buatan I POM, was conducted by “Klinik Asian Agri Sehat Buatan”, dated 22 December 2021 was attended by 43 workers. The MCU was covered urine test, HSaAg and physical test. Safety shoes was provided twice a year for all process operators including mechanic. Monitoring of PPE usage can be demonstrated on document “Monitoring Penggunaan APD” period January – June 2022 for each station. Monitoring of emergency response and preparedness facilities, i.e: fire hydrant (8 units) and fire extinguisher (14 units), updated in March 2022, location in Buatan I POM. Regular emergency response drill conducted on 21 March 2022. The Fire Drill activity attended by 36 participants (workers and staff at Mill). The activity includes Fire Brigade Response, Evacuation to Assembly Point, First Aid Response and Victims Evacuation. Total duration of actual response during Fire Drill is 13 minutes. 	Complied

		<p>PPE provision for all workers is demonstrated as per "Bukti Serah Terima Alat Pelindung Diri". Sample seen:</p> <ul style="list-style-type: none"> • PPE AP Shoes provision for fertilizer workers in Buatan Estate, dated 5 May 2022 received by 37 workers (harvester) • PPE Hand Gloves provision for fertilizer workers in Buatan Estate on 5 May 2022 received by 17 workers (sprayers team) • Checklist of availability the first aid kit, dated 2 May 2022, the result shown OK. Location in Buatan I POM <p>Based on field visit on for spraying workers in Buatan Estate and All KUD's sample during ASA 2.1 – May 2022, the risk impact probability was irritate and eyes disease, control by using appropriate PPE (eye wear/safety glasses, masker and handgloves) and regular training for sprayer workers.</p>	
6.7.4	<p>All workers are provided medical care and covered by accident insurance. Costs incurred from work related incidents, leading to injury or illness, are covered in accordance with applicable regulations or by the unit of certification if applicable regulations do not provide protection.</p>	<p>PT Inti Indosawit Subur – Buatan I POM has provided all normative rights for employee, such as salary as lined out in minimum wage for province level, leave entitlement, employees registered with social insurance for worker (BPJS), benefit for religious festival, provision of facilities (housing, electricity, clean water, medical clinic, school/school bus, worship house, personal protective equipment and working tools.</p> <p>PT Inti Indosawit Subur – Buatan I POM has provided regular medical check-up for workers in high risk such as sprayer team, fertilizer applicator, workshop worker and mill operators.</p> <p>Data verified during ASA 2.1 – May 2022, such as:</p> <ul style="list-style-type: none"> • Buatan Estate: Record for payment of works insurance (BPJS Ketenagakerjaan). Billing statement dated 11 May 2022, amount IDR *2,431,165. status PAID. • Buatan I POM: Record for payment of works insurance (BPJS Ketenagakerjaan). Billing statement dated 11 May 2022; amount IDR *1,352,876 status PAID. <p>Scheme smallholders:</p>	Complied

		The government covers medical insurance for smallholders, and it is optional. Based on interview with smallholders at KUD Bhakti Mandiri, KUD Jaya Makmur, KUD Sumber Rezeki, KUD Sejahtera , confirmed that most of farmers/smallholders has insurance (BPJS Kesehatan Mandiri).	
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	<p>PT Inti Indosawit Subur – Buatan II POM has kept the record of occupational injuries using LTA metrics under “Data Laporan Kecelakaan Kerja” year 2022.</p> <p>Data seen:</p> <ul style="list-style-type: none"> • The occupational injuries reported 9 cases. Lost time injuries are 16 man-days • All the accident has carried out the investigation. The followed up on recommendation on result of investigation available as evidence. <p><u>Scheme Smallholders:</u></p> <p>The record of injuries has shown under document of “Monitoring Kecelakaan Kerja 2022”, since 2022 there were no injuries cases in KUD Bhakti Mandiri, KUD Jaya Makmur, KUD Sumber Rezeki, KUD Sejahtera</p>	Complied
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 <i>Pengendalian Hama dan Penyakit</i> (Pests & Disease Control), certificate holder has plan to be implemented integrated pest management.</p> <p>Based on document verification obtained information that management has had a schedule to regularly monitored pest attack (census) as follows:</p> <ul style="list-style-type: none"> • Census of caterpillar/bag worm by monthly basis. • Census of Ganoderma annually. • Census rat infestation by recap the record of sortation in loading ramp. 	Complied

		<ul style="list-style-type: none"> • Census of Barn Owl Box occupation in three monthly bases. <p>During this ASA 2.1, auditor has observed and interview with pest monitoring officer. Barn-owl box observed at Block C21 Division II Buatan Estate obtain information that the pest infestation was monitoring on daily bases.</p> <p>PT Inti Indosawit Subur – Buatan I POM has train pest monitoring officer (3 person each division). Each block has an observational row (multiples of five, starting from the fifth row). Observations are made every month. The outermost tree in the line of observation has been red marked to facilitate the pest control officer.</p> <p>PT Inti Indosawit Subur – Buatan I POM has conducted pest and disease census in daily bases. Item to check was leaf eating caterpillar, rat infestation and Ganoderma. The record of monitoring reported to pest and disease officer and field assistant as decided to control or not.</p> <p>Evidence available such as “Rekapitulasi sensus Orycthes”, “Rencana Sensus Normal Serangan Ulat Kebun Lae Butar”, “Rencana dan Realisasi Tanam Beneficial Plant 2021 dan 2022 Kebun Buatan”.</p> <p>During the field observation in Division I, II and, obtain information that the observation conducted to monitor the infestation of leaf eater caterpillar, bag worm, Ganoderma, rat, termite and disease. The record of observation written in daily pest infestation report. All of two pest monitoring officers can explain the pest monitoring procedure and reporting process.</p> <p><u>Scheme Smallholder:</u></p> <p>According to document verification, pest monitoring and control sighted pest management plan to conduct caterpillar/bag worm census in by monthly and barn owl box monitored in three monthly bases. Census was conducted by field supervisor that help by person that assign by board of KUD.</p> <p>During the field visit in each KUD blocks(KUD Bhakti Mandiri, KUD Jaya Makmur, KUD Sumber Rezeki, KUD Sejahtera) during ASA 2.1, visually there</p>	
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		was no issues related to the outbreak or infestation. However, there were a usage of natural predator (<i>Tyto alba</i>) to reduce a rat infestation.	
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.	PT Inti Indosawit Subur – Buatan Group only uses natural predators namely <i>Tyto alba</i> and <i>Sycanus dichotomus</i> in pest control efforts. Both predators are not recorded in invasive species according to the information listed on the website www.cabi.org on in global invasive species database http://www.iucngisd.org/gisd/search.php .	Complied
7.1.3	There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities.	Based on document verification, interview with management and stakeholders and field observation obtained information that there is no record use of fire for pest control.	Complied
Criteria 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.			
7.2.1	(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.	Based on the document verification and interview with management, obtain information that there is only pesticide usage for chemical weeding and pest control (if needed). Recommendation of pesticide used are refer to SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i> (weed control) where explain the weeds type, weeding control methods and eradication, pesticide characteristic, and procedures of application (spraying volume, calibration, chemical weeding interval, target and sprayer maintenance). During the audit, found some pesticide list that usually used with active ingredients such as <i>isopropyl amine glyphosate</i> , <i>fluoroksifir</i> , <i>methyl metsulfuron</i> , <i>triklofir</i> , <i>diuron</i> , <i>diuron</i> , <i>lamda sihalotrin</i> and <i>2,4-D dimetil amina</i> , <i>bacillus thuringiensis berliner</i> , <i>ammonium glufosinat</i> , <i>acephate</i> , <i>copper oxide</i> and <i>mancozeb</i> . Certificate holder no longer using paraquat since 15 November 2019, according to the circular letter of Deputy Managing Director No. 008/DMD/MEMO/OCT/19 dated 22 October 2019.	Complied

According to the national regulation, all pesticide used by the management unit has registered in agricultural ministry of Indonesia. It can be check in http://pestisida.id/simpes_app/index.php.

PT Inti Indosawit Subur – Ukui already has a list of pesticides use that refers to the “Penggunaan Pestisida dan LD50 Tahun 2021” as follows:

Brand	Active Ingredient	LD50	WHO Class	Target use
Polydor 25EC	Lambda cyhalotrine	2625	III	Broadleaf weed
Kenlon 480EC	Trychlopyr butoxy ethyl ester	500	II	Broadleaf weeds, shrubs, woody weeds (wood saplings)
Meta Prima	Methyl metsulfuron	5000	III	Weeds with broad leaf
Lindomin 865AS	Dimethylamine	2872	III	Broadleaf weeds
Supremo 480SL	Isopropil amina glifosat	5000	III	Weeds with broad and narrow leaf

Smallholder

During the audit, sighted the list of pesticide recommendation (by active ingredients) that can used by smallholder such as isopropyl amine glyphosate, fluoroksifir, methyl metsulfuron and triklofir. During January 2021 – April 2022, the smallholders used pesticide with active ingredients isopropyl amine glyphosate, fluoroksifir and methyl metsulfuron. There is no record of parakuat diklorida usage.

7.2.2	(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per Ha and number of applications) are provided.	Certificate holder has showed the record of LD50 calculation in each unit based on amount of pesticide used. For example, Buatn Estate has calculated the LD50 of each pesticide in a monthly basis.	Complied
7.2.3	(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.	Up to ASA-2.1 – May 2022, audit obtains 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.	Up to ASA-2.1 – May 2022, there was some pesticide usage especially in nursery and immature area to prevent pest infestation. For example, there was a record of pesticide (active ingredients Lamda sihalotrin) to prevent <i>Spodoptera litura</i> infestation. This prophylactic usage has followed the national guidelines such as dosage, interval and infestation rate. Also, in accordance to Asian Agri’s Research and Development guidelines.	Complied
7.2.5	Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat, are not to be used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks. The due diligence refers to: 7.2.5a Judgment of the threat and verify why this is a major threat.	Based on the document verification and interview with management -during ASA-2.1 – year 2022, 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). According to bin card in chemical store obtained information of pesticide list that usually used with active ingredients such as <i>isopropyl amine glyphosate, fluoroksifir, methyl metsulfuron, triklofir, diuron, paraquat diklorida, diuron, and lamda sihalotrin</i> . Certificate holder no longer using paraquat since 15 November 2019, according to the circular letter of Deputy Managing Director No. 008/DMD/MEMO/OCT/19 dated 22 October 2019.	Complied

		<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>Based on a field visit to the Pesticides Storage - there was no paraquat in place.</p> <p>And based on interviews with sample of smallholder, the pesticides application was carried out by TUS (Tim Unit Semprot) that provided by the Company.</p>	
	<p>7.2.5b Why there is no other alternative which can be used.</p>	<p>Certificate holder has showed the record of LD50 calculation in each unit based on amount of pesticide used. For example, Buatan Estate has calculated the LD50 of each pesticide in a monthly basis.</p>	
	<p>7.2.5c Which process was applied to verify why there is no other less hazardous alternative.</p>	<p>Until this recertification audit obtains information that there is no pesticide use for control pest attack. All of pesticide only using for weeding (herbicide).</p>	

		Based on interview with field assistant and smallholder representatives known that no outbreak that causes pesticide usage.	
	7.2.5d Process to limit the negative impacts of the application.	Based on document verification, interview and field observation obtained information that there is no record of negative impact related to the pesticide application.	
	7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.	Based on goods in and goods out data in pesticide store, obtained information that the certificate holder used some kind of pesticide (different active ingredients). There is only <i>paraquat diklorida</i> that listed as WHO Class II (Moderately Hazardous). As described in this indicator, the company no longer using <i>paraquat diklorida</i> since November 2019. There is no use of other pesticide class 1A and 1B until the audit.	
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.	PT Inti Indosawit Subur – Buatan Group has assigned chemical weeding team (<i>Tim Unit Semprot/TUS</i>) in each estate/unit to handling chemical weeding activity. The team member originated from own workers (for own estate) and local communities (for smallholder). They regularly attended training on pesticide handling that conducted by the pesticide supplier in collaboration with local pesticide committee. Based on document review and interview with random pesticide applicator known that they were attending the last training on pesticide handling on December 2021. Some topics that discuss such as safety pesticide handling, national regulation related to pesticide, symbol and label awareness and emergency procedure if any contamination or poisonous. The worker can describe purpose of PPE usage, attending regularly medical check and safety working procedures. Workers that perform herbicide spraying in Buatan Estate also perform spraying activity in smallholder plantation. Spraying team has been trained with pesticide handling training, agrochemical application training and limited pesticide training. Spraying team only handles herbicide to control	Complied

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

		<ul style="list-style-type: none"> • Permanent floor is cemented, the floor of the mixing of pesticides using ceramics, and equipped with a "spillage trap", • Eye wash shower, first aid box, PPE and Fire extinguisher are provided. • PPE room • Operation control: MSDS are available for all types of existing pesticides and the pesticide management and safety instructions are available • A package management/ used pesticide package is available • Water wash of pesticides containers collected in "spillage trap" • The flow of waste water is channeled and stored so that it is not discharged into the environment. The water used is used for its dilution. • There was no paraquat in place. <p>All waste products have been identified and documented under the "Evaluasi Aspek-Dampak Lingkungan" (Environmental Aspect impacts). Domestic waste is the main concern to be managed. Both Mill and Estate, has periodically schedule to manage the domestic waste.</p>	
7.2.8	All pesticide containers that are disposed of and/or used for other purposes are managed according to applicable regulations and/or instructions on the packaging.	<p>All chemicals and empty containers collected and stored at permitted hazardous waste storage (Tempat Penyimpanan Sementara Limbah B3) location at Buatan I POM.</p> <p><u>Scheme smallholders:</u></p> <p>Group manager Smallholder Buatan has a policy and mechanism to manage the waste from ex fertilizer sack according to procedure of "Pengelolaan Kemasan Ex (Bekas) Pupuk di Kebun No. 035/DOK/SOP/PT.IIS KLB-AA/2016" dated 2 December 2016. The ex fertilizer sack must be handled by triple rinse and use as loose fruit sack, the inner bag of fertilizer was delivered to collector.</p> <p>During field visit and interview with sample smallholder in KUD Sumber Rejeki and KUD Jaya Makmur, they were aware to manage the waste from ex fertilizer sack and empty chemical.</p>	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.	Based on interview with sustainability staff and field visit confirmed that there is no aerial spraying pesticide performed by PT Inti Indosawit Subur – Buatan Estate.	Complied
7.2.10	(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.	<p>Buatan Estate & Scheme Smallholder:</p> <p>Annual medical check-up was conducted for all workers handling with chemical, such as pesticide, herbicide and fertilizer.</p> <p>Report of MCU for all workers in Buatan I POM, was conducted by “Klinik Asian Agri Sehat Buatan”, dated 22 December 2021 was attended by 43 workers. The MCU covered urine test, HSaAg and physical test.</p> <p>Medical examination for smallholder’s pesticide operator is include with Estate, because those chemical/spraying operators are work at Estate and Smallholders area. Sample: KUD Sumber Rejeki and KUD Jaya Makmur.</p>	Complied
7.2.11	(C) No pesticide-related work is carried out by pregnant or breastfeeding women, or people with medical limitations and they are offered other equivalent work alternatives.	<p>PT Inti Indosawit Subur – Buatan Group prohibits pregnant or breast-feeding women to perform chemical spraying. In order to mitigate, estate performed monthly pregnancy test.</p> <p>PT Inti Indosawit Subur – Buatan I POM has kept the record that spraying is not conducted by pregnant or breast-feeding women. The company has been conducting PP Test (pregnant test) every month.</p> <p>The last of pregnancy test conducted in May 2022. All the female sprayer in well condition and not being pregnant nor breast feeding.</p>	Complied

Note For 7.2.11

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

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

<p>7.3.1</p>	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented in accordance with applicable laws and regulations.</p>	<p>PT Inti Indosawit Subur – Buatan I POM and Estate collects all hazardous waste from estates and mill into temporary hazardous waste storage in central workshop compound.</p> <p>PT Inti Indosawit Subur – Buatan I POM has prepared a procedure to handle hazardous waste titled “Prosedur Penanganan Limbah B3” No.AA-KL-06-EFP explains methods to collecting the waste, recording in balance and disposal through licensed third party transporter</p> <p>PT Inti Indosawit Subur – Buatan I POM has been storing the hazardous waste in temporary storage with permit. The temporary hazardous waste storage has a valid permit based on “Surat Keputusan Badan Penanaman Modal dan Pelayanan Perijinan Terpadu nomor: KPTS.311/BPMP2T-PLY/XI/2021, dated 21 November 2021, the license valid until 20 November 2026.The hazardous waste is sent to the registered collector/transporter which approved by Environmental Ministry, namely PT Indostar Cargo.</p> <p>A documented waste management plan to avoid or reduce pollution and its implementation shall available under document of Environmental Aspect-Impacts (Evaluasi Aspek-Dampak Lingkungan) year 2022. The document covered all operation in mill, estate and its smallholders.</p> <p>Records of empty containers pesticides stock and disposal were available in “Neraca Limbah B3” and “Manifest Limbah B3”. During audit, indicated that company can be demonstrated the proper disposal of empty containers pesticides. Each quarter the waste management of empty containers pesticides also reported to local Environmental Agency of Pelalawan Regency and Riau Province.</p> <p>Data seen:</p> <ul style="list-style-type: none"> • Manifest: BBE 00001986, empty container (chemical), quantity 1.5 MT, dated 13 March 2022 – was sent to PT Amindy Barakah • Neraca Limbah B3 January – March 2022 	<p>Complied</p>
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7.3.2	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.	<p>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 Indostar Cargo.</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>	Complied
7.3.3	The unit of certification does not use open fire for waste disposal.	<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. The document of "Jadwal Pengangkutan Sampah 2022 untuk Karyawan Buatan Estate, update 15 Jan 2019". Regulation of domestic waste management refer to "UU No. 18 Tahun 2008 tentang Pengelolaan Sampah".</p> <p>ICS Group Plasma Buatan has defined the procedure "Pengelolaan Kemasan Ex (Bekas) Pupuk di Kebun" No. 035/DOK/SOP/PT.IIS KLB-AA/2016 dated 2 December 2016. All ex fertilizer sack was prohibit to dispose in plantation and housing area. All the ex fertilizer sack usage must be identified and reported to Group Manager ICS.</p>	Complied
Criteria 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	Good agricultural practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts is documented.	<p>Buatan Estate & Scheme Smallholder:</p> <p>Both own estate and smallholder has had the procedure related to manage soil fertility (see detail in indicator 3.3.1). The implementation of manuring</p>	Complied

		<p>is based on fertilizer recommendation that set by Asian Agri’s Research and Development Department. Fertilizer dosage has set according to the soil needed refer to SSU/LSU.</p> <p>Based on interview with smallholder representatives obtain information that they only using fertilizer according to the recommendation from Asian Agri’s Research and Development Department. No fertilizer applied in riparian area to minimize environmental impact.</p> <p>During the field visit at Block B20f Afdeling 2 known that the management unit has applied fertilizer according to the fertilizer’s recommendation issued by Asian Agri Research and Development Department. Based on field visit in Block B20f Afdeling 2 using NPK with dosage 1.5 kg/palm (this is in accordance with fertilizer’s recommendation 2021).</p> <p>In addition, management unit also applied EFB application especially in new planting and immature areas to maintain soil fertility, maintain soil moisture and reducing weed. Based on field visit in Block B20d Afdeling 2, auditor has verified the EFB application in immature area with dosage 30 ton/Ha/year.</p> <p>Based on interview with smallholders, most of their plots is no longer applied with fertilizer due to in replanting preparation in 2022 – 2023.</p>	
7.4.2	<p>Analysis of tissue samples (e.g. leaves) and soil on a regular basis to monitor and manage changes in soil fertility and plant health is documented.</p>	<p>According to the Asian Agri’s agricultural policy, soil sampling conducted every 5 years while leaf sampling conducted annually. Based on document verification sighted the report of soil and leaf sampling in own estate and smallholders as follows:</p> <ul style="list-style-type: none"> • The last soil sampling conducted on 27 May 2016. Parameter that tested is N, C, K, Ca, Mg and pH. Result of leaf sampling analysis are presented in Soil Analysis Lab, No. Lab 1652581 – 1652585 Code of Sample Profile P6. • The last leaf sampling conducted on 26 April 2021. Parameter that tested is major element (Ash, N, P, K Mg, Ca) dan Minor element (B, Cu, Zn, Mn, Fe). Result of leaf sampling analysis are presented in Leaf 	Complied

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		<p>Analysis Result Lab. ref.078/INT/R&D/APRIL/L/2021 AFD I, dated 26/04/2021, 44 samples; Lab. ref. 078/INT/R&D/APRIL/L/2021 AFD II dated 16/04/2021, 42 samples</p> <p>Those reports are converted to be fertilizer recommendation by Asian Agri's Research and Development Department.</p>	
7.4.3	<p>A nutrient recycling strategy is in place, which include the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.</p>	<p>Buatan Estate & Scheme Smallholder:</p> <p>According to the Agricultural Policy Manual, certificate holder has had a guidance in organic fertilizers such as Empty Fruit Bunch (EFB) and Palm Oil Mill Effluent (POME). Certificate holder has implemented EFB application in estate with dosage 30 – 50 ton/Ha in normal soil and POME with dosage 750 m3/Ha in Buatan Estate.</p> <p>According to the interview with smallholder representatives, currently there is no longer EFB application since their area has planned to be replanting.</p> <p>During the audit known that the management unit has applied fertilizer according to the fertilizer's recommendation issued by Asian Agri Research and Development Department. Based on field visit in Block B20f Afdeling 2 using NPK with dosage 1.5 kg/palm (this is in accordance with fertilizer's recommendation 2021).</p> <p>In addition, management unit also applied EFB application especially in new planting and immature areas to maintain soil fertility, maintain soil moisture and reducing weed. Based on field visit in Block B20d Afdeling 2, auditor has verified the EFB application in immature area with dosage 30 ton/Ha/year.</p> <p>Based on interview with smallholders, most of their plots is no longer applied with fertilizer due to in replanting preparation in 2022 – 2023.</p>	Complied
7.4.4	<p>Records of fertilizer inputs are maintained.</p>	<p>The result of leaf sampling analysis, soil sampling analysis along with visual analysis, planting material, planting age and rain fall are considered in proposing the Fertilizer Recommendation.</p> <p>Fertilizer Recommendation and realization for year 2021:</p>	Complied

Buatan Estate			
Fertilizer	Recommendation (Kg)	Realization (Kg)	%
AC	282,346	282,352	100
RP	208,871	208,871	100
Kiesrite	57,800	57,800	100
Dolomite	140,614	140,614	100
HGFB	17,698	17,698	100
NPK	287,527	287,527	100
MOP	259,114	259,114	100

Fertilizer Recommendation and realization for year 2022:
 Buatn Estate

Fertilizer	Recommendation (Kg)	Realization (Kg)	%
AC	694,804	144,033	21
RP	445,917	157,198	35
Kiesrite	22,209	22,111	100
Dolomite	367,849	279,860	76
HGFB	32,315	1,170	4
NPK	159,570	158,213	99
MOP	581,889	128,143	22

		<i>Note: realization until June 2022</i>	
Criteria 7.5: Practices minimise and control erosion and degradation of soils.			
7.5.1	(C) Maps that identify marginal and fragile soils, including steep sloped land are available.	<p>Buatan Estate:</p> <p>Soil Analysis in PT Inti Indosawit Subur – Buatan Estate carried out in October – December 2008. Reported under “Laporan Survey Tanah Semidetil Area Perkebunan Kelapa Sawit PT Inti Indosawit Subur Kebun Buatan”. Based on the report, the physiographic location in plain with hilly tuffaceous sedimentary rocks. Lithology parent material is clay and sand. Topographic of the area is rolling to hilly. Natural fertility is low to medium. Soil map scale 1:20,000 available, from semi- detailed soil survey 2008 by R&D Asian Agri. The predominant soil type identified in Division IV, V and VI Buatan Estate composed of Typic dystrudepts (dominant), Typic kandiuults, Typic Endoaquults, Typic endoaquepts.</p> <p>Topographic map scale 1:20,000 available, from semi-detailed soil survey the slope between 0-8%, 8-15%, 15-30% and >30%. The data and field information from semi-detailed soil survey 2008 by R&D Asian Agri.</p> <p>Soil suitability: S2 2,656 Ha (47.2%) with limiting factor of low natural fertility; S3 2,050 Ha (36.4%) with limiting factor of topographic condition; N1 (not suitable) 925 Ha (16.4%) with limiting factor of slope more than 30% and sandy soil with rapid drainage.</p> <p>Scheme Smallholder:</p> <p>The soil map for all individual member was available at Plasma Buatan office and KUD office with scale 1:50,000. There are 4 series of soil type defined by Research and Development Asian Agri based on soil survey on April 2014 and soil survey semi detail on June 1998:</p> <ol style="list-style-type: none"> 1. Typic Dystrudepts 2. Typic Endoaquepts 3. Typic Endoaquults 	Complied

		4. Typic Kandiuults Soil map and soil survey result recorded in "Laporan Survei Tanah Tinjau Kebun Plasma Buatan".	
7.5.2	The replanting of palm oil is not conducted extensively on steep terrain in accordance with applicable regulations.	Based on field visit in slope area especially in replanting areas known that the management unit has provide terrace contour. For example, in replanting area (Estate and Smallholder). There is no fire usage during that process. The management unit also provide legume cover crop to minimize the soil erosion.	Complied
7.5.3	New palm oil planting is not conducted on steep terrain in accordance with applicable regulations.	There is no new palm oil planting in Buatan Estate.	Not Applicable
Criteria 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.			
7.6.1	(C) Evidence of long-term land suitability for oil palm cultivation, soil maps or soil surveys that identify marginal and fragile soils, including steep terrain are available, in planning and operations.	Certificate holder through Agri Agri's Research and Development Department has conducted soil mapping 2010. They also had SOP AA-APM-OP-1100.05-R3 dated 23 November 2016: <i>Konservasi Tanah dan Air</i> (Soil & Water Conservation) as guidance for soil conservation in each topography. There is no marginal soil within the certified area of PT Inti Indosawit Subur – Buatan Estate and Buatan Plasma in accordance with Soil Analysis Report carried out by R & D on December 2008. It was also confirmed during onsite audit to Buatan Estate and Scheme Smallholder.	Complied
7.6.2	Extensive planting on marginal and fragile soils is avoided or, if necessary, carried out according to the best-practice soil management plan.	There is no marginal soil within the certified area of PT Inti Indosawit Subur – Buatan Estate and Buatan Plasma in accordance with Soil Analysis Report carried out by R & D on December 2008. It was also confirmed during onsite audit to Buatan Estate and Scheme Smallholder.	Complied
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	There is no marginal soil within the certified area of PT Inti Indosawit Subur – Buatan Estate and Buatan Plasma in accordance with Soil Analysis Report carried out by R & D on December 2008. It was also confirmed during onsite audit to Buatan Estate and Scheme Smallholder.	Complied

Criteria 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	(C) No new planting on peatlands, regardless of depth, after 15 November 2018, in existing plantation areas, as well as in new development areas.	There is no new planting within certified area of PT Inti Indosawit Subur – Buatan Estate and Buatan Plasma after November 2005. Currently, replanting activities are still in progress. First cycle starts from year 1988, 1989, 1990 and 1991.	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).	There is no new planting within certified area of PT Inti Indosawit Subur – Buatan Estate and Buatan Plasma after November 2005. Currently, replanting activities are still in progress. First cycle starts from year 1988, 1989, 1990 and 1991.	Not Applicable
PROCEDURAL NOTE: Maps and other documentation for peatlands are provided, prepared and shared according to the RSPO Working Group (Peatland Working Group / PLWG) audit guide (See Procedural Notes for Indicator 7.7.5 below).			
7.7.3	(C) Subsidence of peat is monitored, documented and minimised.	<p>Own Estate: Based on Soil Analysis carried out by R & D on December 2008 in Buatan Estate. Reported under "Laporan Survey Tanah Semidetil Area Perkebunan Kelapa Sawit PT Inti Indosawit Subur Kebun Buatan". Based on the report, the physiographic location in plain with hilly tuffaceous sedimentary rocks. Lithology parent material is clay and sand. Topographic of the area is rolling to hilly. Natural fertility is low to medium. There is no peat soil identified in Buatan Estate according to the latest soil analysis by R & D Asian Agri.</p> <p>Scheme Smallholder: No peat soil in Plasma Buatan I, verified the soil type maps was found that there is no peat soil identified in the Plasma Buatan area. Hence, there is no need to conduct peat subsidence monitoring.</p>	Not Applicable
7.7.4	(C) Availability of implementation evidence of the water and land cover management program.	<p>Own Estate: Based on Soil Analysis carried out by R & D on December 2008 in Buatan Estate. Reported under "Laporan Survey Tanah Semidetil Area Perkebunan Kelapa Sawit PT Inti Indosawit Subur Kebun Buatan". Based on the report, the physiographic location in plain with hilly tuffaceous sedimentary rocks.</p>	Not Applicable

		<p>Lithology parent material is clay and sand. Topographic of the area is rolling to hilly. Natural fertility is low to medium. There is no peat soil identified in Buatan Estate according to the latest soil analysis by R & D Asian Agri.</p> <p>Scheme Smallholder:</p> <p>No peat soil in Plasma Buatan I, verified the soil type maps was found that there is no peat soil identified in the Plasma Buatan area.</p> <p>Hence, there is no need to set water and land cover management program.</p>	
7.7.5	<p>(C) Drainability assessments are conducted for plantations planted on peat following the RSPO Drainability Assessment Procedure, or other method recognized by RSPO, (at least five years or in accordance with the provisions of the RSPO Drainability Assessment Procedure) before replanting. The results of the assessment are used to determine the period of replanting to be carried out, as well as to gradually replace oil palm cultivation for at least 40 years or two cycles, (whichever is longer), before reaching the natural gravitational drainage limit for peat. If oil palm is gradually replaced, it is replaced by other commodity crops that are better suited for higher groundwater levels (paludiculture) or rehabilitated with natural vegetation.</p>	<p>Own Estate:</p> <p>PT Inti Indosawit Subur – Buatan Estate conducted coordination with R & D department to performed re-analysis of soil in Buatan Estate area to determine whether peat soil is still existed.</p> <p>Soil Analysis carried out by R & D on December 2008 in Buatan Estate. Reported under "Laporan Survey Tanah Semidetil Area Perkebunan Kelapa Sawit PT Inti Indosawit Subur Kebun Buatan". Based on the report, the physiographic location in plain with hilly tuffaceous sedimentary rocks. Lithology parent material is clay and sand. Topographic of the area is rolling to hilly. Natural fertility is low to medium. There is no peat soil identified in Buatan Estate according to the latest soil analysis by R & D Asian Agri.</p> <p>Soil map scale 1:20,000 are available, from semi-detailed soil survey 2008 by R&D Asian Agri. The predominant soil type identified in Buatan Estate composed of:</p> <ul style="list-style-type: none"> • Typic Distrudepts 4,040 Ha • Typic Endoaquents 140 Ha • Typic Endoaquepts 515 Ha • Typic Endoaquults 290 Ha • Typic Kandiudults 621 Ha • Typic Udipsaments 25 Ha <p>Total 5,361 Ha</p>	Not Applicable

		<p>Topographic map scale 1:20,000 available, from semi-detailed soil survey the slope between 0-8%, 8-15%, 15-30% and >30%. The data and field information from semi-detailed soil survey 2017 by R&D Asian Agri. Soil suitability: S2 2,656 Ha (47.2%) with limiting factor of low natural fertility; S3 2,050 Ha (36.4%) with limiting factor of topographic condition; N1 (not suitable) 925 Ha (16.4%) with limiting factor of slope more than 30% and sandy soil with rapid drainage. Therefore, drainability assessment of peat soils were not applicable for Buatan Estate.</p> <p>Scheme Smallholder:</p> <p>No peat soil in Plasma Buatan I, verified the soil type maps was found that there is no peat soil identified in the Plasma Buatan area.</p> <p>There are 4 series of soil type defined by Research and Development Asian Agri based on soil survey on April 2014 and soil survey semi detail on June 1998:</p> <ol style="list-style-type: none"> 1. Typic Dystrudepts 2. Typic Endoaquepts 3. Typic Endoaquults 4. Typic Kandiuults 	
<p>PROCEDURAL NOTE: For 7.7.5: Detailed information on the RSPO Drainability Assessment Guide along with related concepts and detailed actions is contained in the Guidelines currently being adjusted / tested by the RSPO Working Group on Peatlands (Peatland Working Group / PLWG). The final version must obtain PLWG approval in January 2019 and will include additional Guide on the steps to be followed after deciding not to replant and the consequences for other stakeholders, farmers, local communities, and the unit of certification concerned. It is recommended that the trial methodology period is proposed to be extended for 12 months for all relevant management units (ie management units that have plantations on peat) to utilize the methodology and provide input to PLWG so that existing procedures can be further refined as needed before January 2020. The unit of certification has the option to delay replanting until the issuance of the revised Guidelines for the guidelines. Additional guidance for alternative commodity crops and rehabilitation of natural vegetation will be regulated by the PLWG.</p>			
7.7.6	<p>(C) All existing plantations on peat are managed according to applicable laws and/or "RSPO Guidelines for Best Management Practices (BMP) for Oil Palm Cultivation that are already on</p>	<p>There are no peat areas within certified area of PT Inti Indosawit Subur – Buatan Estate and Buatan Plasma in accordance with Soil Analysis carried out by R & D on December 2008. It was also confirmed during field visit and onsite audit to Buatan Estate and Scheme Smallholder.</p>	Not Applicable

	Peatlands", version 3 (June 2019) along with related audit guidelines (May 2019).		
7.7.7	(C) All peat areas not planted and reserved in managed areas (regardless of depth) are protected as 'peatland conservation areas'; unit of certification are prohibited from constructing drainage channels, building roads and new electricity lines on peatlands; unless if it is for a non- corporate land clearance. Peatlands are managed in accordance with 'RSPO Best Management Practices for the Management and Rehabilitation of Natural Vegetation related to Oil Palm Cultivation that already exists in Peatlands' (the latest version) along with relevant audit guidelines.	There are no peat areas within certified area of PT Inti Indosawit Subur – Buatan Estate and Buatan Plasma in accordance with Soil Analysis carried out by R & D on December 2008. It was also confirmed during field visit and onsite audit to Buatan Estate and Scheme Smallholder.	Not Applicable
Criteria 7.8: Practices maintain the quality and availability of surface and groundwater.			
7.8.1	A water management plan is available and is implemented to support efficient use of water sources and continuous availability and avoid negative impacts on other users in the catchment. The plan referred to contains the following matters: 7.8.1a The unit of certification does not limit access to clean water or does not pollute the water used by the community.	PT Inti Indosawit Subur - Buatan has prepared the plan of water management plan as in "Program Manajemen Lingkungan 2022" consist of management water supply for domestic, water consumption and measurement of water quality. Water Management Plan, indicating the water need, permit and licensing, monitoring of water quality, infrastructure maintenance and conservation. The company has conducted measurement of water quality regularly (each semester) and consistent, the result of analysis semester II 2019 shown that water quality is complies with national regulation. All of KUD has program on water management as in "Rencana dan Realisasi Penyusunan Pelapah Letter "U", frond stacking."Rencana dan Realisasi Perawatan Teresan sebagai Sarana Konservasi Tanah dan Air serta Upaya Pencegahan Erosi" PT Inti Indosawit Subur – Buatan I POM has establish management plan to protect water courses and wetlands, including securing and maintaining appropriate riparian.	Complied

		<ul style="list-style-type: none"> - Riparian restoration with forest vegetation plant/tree. - Establish zone for zero chemical. No spraying and fertilizing along riparian zone. Based on visit in riparian zone (Sempadan Sungai Laniago) in block BA90 - Conserve natural vegetation in riparian zone - Restricted to conduct replanting palm oil in riparian area. <p>PT Inti Indosawit Subur – Buatan I POM has also prepared the procedure on protection of water courses under “SOP Pengendalian Riaprian” number AA-APM-OP-1100.21-R2, dated 25th February 2016.</p> <p>Buatan I POM has permit for surface water usage from “Kementrian Pekerjaan Umum dan Perumahan Rakyat” as per “Keputusan Menteri Pekerjaan Umum dan Perumahan Rakyat nomor 14/KPTS/M/2018 tentang Pemberian izin Pengusahaan Sumber Daya Air kepada PT Inti Indosawit Subur untuk Usaha Industri di Sungai Laniago, Kabupaten Pelalawan dan Kabupaten Siak”, dated 5th January 2018.</p> <p>Buatan I POM also paid the water retribution each month to “UPT Pengelolaan Pendapatan, Badan Pendapatan daerah Pemerintah Provinsi Riau”. Sample: SPPD (Surat Setoran Pajak Daerah) untuk Pajak Pengambilan dan Pemanfaatan Air Permukaan Bulan April 2022”, total IDR XX,631,400</p> <p>Scheme smallholders:</p> <p>All of KUD has program on water management as in “Rencana dan Realisasi Penyusunan Pelapah Letter “U”, frond stacking.”Rencana dan Realisasi Perawatan Teresan sebagai Sarana Konservasi Tanah dan Air serta Upaya Pencegahan Erosi”. During field visit can be demonstrated that smallholder member has implementing frond stacking accordingly to prevent the soil erosion. Water management has also implemented by prohibiting spraying activity near to waterways with distance 3 m from left and side of waterways.</p>	
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	<p>7.8.1b Workers have adequate access to clean water.</p>	<p>PT Inti Indosawit Subur - Buatan has prepared the plan of water management plan as in "Program Manajemen Lingkungan 2022" consist of management water supply for domestic, water consumption and measurement of water quality. Water Management Plan, indicating the water need, permit and licensing, monitoring of water quality, infrastructure maintenance and conservation</p> <p>The result of moniting or testing the clean water / water consumption conducted by "Unit Pelaksana Teknisi Laboratorium Bahan Konstruksi", Pekanbaru. Certificate of Analysis for Domestic Water (by cooking treatment), location in Buatan I POM – Report of Analysis No: MT131/03.01.54.87, dated 7th April 2022, the reference of analysis report is based on PERMENKES NO 492/MENKES/PER/IV/2010</p>	
<p>7.8.2</p>	<p>(C) Water courses and wetlands are protected, including the maintenance and restoration of riparian zones and other buffer zones during or before replanting, in accordance with the "RSPO Manual on BMPs for the management and rehabilitation of riparian reserves" (April 2017) or Simplified Guide Management and Rehabilitation of Riparian Reserves (2018).</p>	<p>PT Inti Indosawit Subur – Buatan I POM has establish management plan to protect water courses and wetlands, including securing and maintaining appropriate riparian.</p> <ul style="list-style-type: none"> • Riparian restoration with forest vegetation plant/tree. • Establish zone for zero chemical. No spraying and fertilizing along riparian zone. Based on visit in riparian zone (Sempadan Sungai Laniago) in block BA90 • Conserve natural vegetation in riparian zone • Restricted to conduct replanting palm oil in riparian area <p>During field visit to Laniago riparian there was no chemical application near to riparian, no disturbance on riparian, natural vegetation are protected and the signboard information and awareness are available.</p> <p>Enrichment planting at buffer zone area updated in December 2021 in Buatan I Estate, as follow:</p> <ul style="list-style-type: none"> • Bamboo (<i>Bambusa vulgaris</i>): 2 clumps, location in block C21, division II • Kelor (<i>Moringa oleifera</i>): 6 tresses; location block D12, in Division I 	<p>Complied</p>

		<ul style="list-style-type: none"> • Waru (<i>Hibiscus tiliaceus</i>): 6 trees; location in block C47, Division I 													
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>Buatan I POM, there was 11 ponds in effluent treatment system (WWTP), which consists of Colling Pond, Primary Anaerobic pond, Secondary Anaerobic pond, Acidification pond, and Buffering pond. Procedure of WWTP operation available in Mill Policy Manual (MPM) dated February 1, 2013, chapter AA-MPM-OP-1400.13-R1.</p> <p>Buatan I POM is undergoing Biogas power plant construction since April 2015 to generate electrical power by using waste water treatment. The biogas system has Anaerobic MBR system thorough digester Thermophilic fermentation, and anaerobic membrane tank.</p> <p>According to effluent monitoring data, all produced mill effluent used for land application. Mill holds permit to discharge waste water into land application from local authority through Decree number KTPS.660/BLH/780/2014, issued on 10th September 2014 valid for 5 years. Total area of land application covers 679 hectares at Block B and C.</p> <p>As required by LA permit, Mill conducts monthly check on discharged effluent in cooperation with accredited Laboratory (UPT Pengujian Material, Dinas Bina Marga Provinsi Riau). According to recent testing result, BOD level of applied effluent has met the applicable threshold of KepmenLH No.28/2003 regarding BOD limits of effluent discharge for land application. The level is maintained consistently less than 5,000 mg/L and debit <600 m3 per day.</p> <p>Sample seen year 2022:</p> <table border="1" data-bbox="1064 1161 1886 1391"> <thead> <tr> <th>Month - 2022</th> <th>BOD (mg/l) – standard of quality 5,000</th> <th>pH – standard of quality 6-9</th> </tr> </thead> <tbody> <tr> <td>January</td> <td>2,610</td> <td>7.62</td> </tr> <tr> <td>February</td> <td>2,840</td> <td>7.73</td> </tr> <tr> <td>March</td> <td>2,620</td> <td>7.61</td> </tr> </tbody> </table>	Month - 2022	BOD (mg/l) – standard of quality 5,000	pH – standard of quality 6-9	January	2,610	7.62	February	2,840	7.73	March	2,620	7.61	Complied
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April	2,640	7.59															
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7.8.4	Mill water use per tonne of FFB is monitored and recorded.	<p>Buatan I POM has recorded the mill water use per tonne FFB, includes monitoring of water usage for mill processing and domestic usage. Result of water usage monitoring is recorded under “Mill Operation Summary” year 2022. Budget in 2022 is 1.10 M3/Ton FFB.</p> <p>Record in January – May 2022 has shown:</p> <table border="1"> <thead> <tr> <th>Month - 2022</th> <th>Water use per ton FFB</th> </tr> </thead> <tbody> <tr> <td>January</td> <td>0.92</td> </tr> <tr> <td>February</td> <td>0.89</td> </tr> <tr> <td>March</td> <td>1.19</td> </tr> <tr> <td>April</td> <td>0.92</td> </tr> <tr> <td>May</td> <td>0.89</td> </tr> <tr> <td>YTD</td> <td>(Budget YTD 1.03)</td> </tr> </tbody> </table>	Month - 2022	Water use per ton FFB	January	0.92	February	0.89	March	1.19	April	0.92	May	0.89	YTD	(Budget YTD 1.03)	Complied
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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 Inti Indosawit Subur – Buatan I POM has prepared the program for improving efficiency of the use of fossil fuels and to optimize renewable energy under “Rencana Manajemen Lingkungan” year 2022. In point 2 stated to improving efficiency of the use of fossil fuels such monitoring on use of fossil fuels</p> <p>Fossil fuel records was maintenance and the trends shown. Energy use records include accurate measurements of renewable energy use per ton</p>	Complied														

		<p>of FFB processed. All the shell and fiber are consumed internally as boiler fuel. Fossil fuel usage is recorded for operational purpose, including the efficiency analysis.</p> <p>Data verified: Energy resources for Generator and Turbine operation, year 2022:</p> <table border="1" data-bbox="1064 539 1861 837"> <thead> <tr> <th>Month</th> <th>Genset (KWH)</th> <th>Turbin (KWH)</th> </tr> </thead> <tbody> <tr> <td>January</td> <td>31,343</td> <td>413,100</td> </tr> <tr> <td>February</td> <td>24,341</td> <td>421,000</td> </tr> <tr> <td>March</td> <td>44,543</td> <td>468,530</td> </tr> <tr> <td>April</td> <td>25,753</td> <td>416,600</td> </tr> <tr> <td>May</td> <td>47,564</td> <td>445,100</td> </tr> </tbody> </table> <p>Scheme Smallholders:</p> <p>Each KUD (KUD Bhakti Mandiri, KUD Jaya Makmur, KUD Sumber Rezeki, KUD Sejahtera has prepared a plan for improving efficiency of the use of fossil fuels and optimize of renewable energy under "Pedoman Pemanfaatan Sumber Energy", last review on 15th January 2022. The source of energy was identified e.g.: water, gasoline, fuels, kerosene and electrical.</p>	Month	Genset (KWH)	Turbin (KWH)	January	31,343	413,100	February	24,341	421,000	March	44,543	468,530	April	25,753	416,600	May	47,564	445,100	
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<p>Criteria 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.</p>																					
7.10.1	<p>(C) GHG emissions for the unit of certification are identified and assessed. Plans to reduce or minimize GHG emissions are implemented, monitored through the PalmGHG calculator, and reported publicly.</p>	<p>PT Inti Indosawit Subur – Buatan I POM has identified the emission sources and pollution under document of "Environmental Aspect-Impacts (Evaluasi Aspek-Dampak Lingkungan) year 2022".</p> <p>Identification of greenhouse gas (GHG) emissions sources both of Mill, Estate and Smallholders consist of emission from boiler and generator,</p>	<p>Non-compliance</p>																		

		<p>effluent from mill wastewater, particulate from boiler stack, noise, fertilizer application, fossil fuels usage, transport of FFB</p> <p>The assessment of pollution activities was documented in "Mitigasi Has Rumah Kaca". All the activities of mill and estate as well as the waste generated has been well documented, for examples the operational activities from generator is generates air emissions, the company conducts periodic generator maintenance and perform quality measurement of exhaust emissions each semester to ensure air quality is comply with standard regulation.</p> <p><u>Scheme Smallholder:</u></p> <p>Manager of Kebun Plasma Buatan has prepared the list significant pollutants and identify sources of emissions, presented in "Identifikasi Sumber Polusi di Perkebunan Petani Kebun Plasma Buatan PT Inti Indosawit Subur 2020". List of significant pollutant such as emission from FFB transportation, water pollutant from fertilizing and spraying activity, emission from generator usage.</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 prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p>	<p>There is no new planting within certified area of PT Inti Indosawit Subur – Buatan Estate and Buatan Plasma after November 2005. Currently, replanting activities are still in progress. All of the immature area was for replanting, for oil palm with planting year 1988, 1989, 1990 and 1991.</p>	Complied
7.10.3	<p>(C) Other significant pollutant identification results are available and plans to reduce or minimize them are implemented and monitored.</p>	<p>PT Inti Indosawti Subur – Buatan I POM has identified the significant pollutants and greenhouse gas (GHG) emissions.</p> <p>Significant pollutants and GHG such as: Emission, particulate, noise from boiler and generator, effluent from mill wastewater, fertilizer application, chemical applicator and transport of FFB.</p> <p>Monitoring of air emissions and ambient air quality conducted every semester. Emissions test conducted testing by Accreditation Laboratory.</p>	Complied

		The results of the analysis have been demonstrated and reported to Environmental Agency every six months, e.g: Subject of analysis for air emission and Air Ambient in Buatan Estate - Report of sampling and analysis: certificate No 00068/CLAIAL, month January 2020 conducted by Sucofindo, the result is comply with Environmental Minister Decree No Kep-13/MENLH/2009, attachment I and The Labour Minister Decree No Kep-13/MEN/2011.	
Criteria 7.11: Fire is not used for preparing land and is prevented in the managed area.			
7.11.1	(C) Land for new planting or replanting is not prepared by burning.	<p>PT Inti Indosawit Subur – Buatan has developed an early warning system, to monitor the risk of fire. The system “Sistem Peringkat Bahaya Kebakaran 1 & 2”. The monitoring system calculating the field condition, ignition risk, potential drought and smoke, fire handling, fire fighting difficulty and weather index. Patrol report indicating any fire incident.</p> <p>Based on field visit in block A21C in Division II Buatan Estate (dated 2nd March 2021), the land preparation is using mechanical method. No any open burning was noted for land preparation. It can also demonstrated in the agreement contract between compay and subcontractor that all activity of replanting is performed manual and mechanically.</p> <p><u>Scheme Smallholder:</u></p> <p>There was no any open burning was noted for land preparation and any activity in KUD Sumber Rejeki and KUD Jaya Makmur. Replanting plan has been drawn up in the near future. The replanting plan was available under “S Pelaksanaan Replanting Kebun Plasma Buatan”.</p> <p>During field visit at KUD Sumber Rejeki and KUD Jaya Makmur dated 3rd March 2021, there was a replanting and no burning activity. The land preparation is using mechanical method.</p>	Complied
7.11.2	The unit of certification establishes fire prevention and control measures for lands that are directly managed by the unit of certification.	There is no new planting within certified area of PT Inti Indosawit Subur – Buatan Estate and Buatan Plasma after November 2005. Currently,	Complied

		<p>replanting activities are still in progress. All of the immature area was for replanting, for oil palm with planting year 1988, 1989, 1990 and 1991.</p> <p>Replanting has been done mechanically, consist of: falling tree, chipping by excavator, terracing by excavator, digging, road construction, ditch/waterways construction, planting LCC and planting oil palm. Company has established "Ketentuan Replanting areal Mineral" tahun 2016. In the mechanism explained that replanting must be conducted mechanically without burning.</p> <p>Based on field visit in block A21C in Division II Buatan Estate (dated 2nd March 2021), the land preparation is using mechanical method. No any open burning was noted for land preparation. It can also demonstrated in the agreement contract between compay and subcontractor that all activity of replanting is performed manual and mechanically</p> <p><u>Scheme Smallholder:</u></p> <p>During field visit at KUD Sumber Rejeki and KUD Jaya Makmur dated 3rd March 2021, there was a replanting and no burning activity.</p>	
7.11.3	<p>The unit of certification engages stakeholders in adjacent locations for fire prevention and control measures.</p>	<p>The policy has communicated to all smallholder member and local community to engages stakeholders in adjacent locations for fire prevention and control measures.</p> <p>Record of socialization to smallholder the policy to engages stakeholders in adjacent locations for fire prevention and control measures, e.g: on 21 November 2021 location in KUD Sumber Rejeki, on 9 January 2022 location in KUD Sejahtera and on 7 January 2022 location in KUD Bhakti Mandiri</p> <p>Replanting has been done mechanically, consist of: falling tree, chipping by excavator, terracing by excavator, digging, road construction, ditch/waterways construction, planting LCC and planting oil palm. Company has established "Ketentuan Replanting areal Mineral" tahun 2016. In the mechanism explained that replanting must be conducted mechanically without burning.</p>	Complied

<p>Criteria 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.</p>			
<p>PROCEDURAL NOTE for 7.12:</p> <p>The RSPO Principles and Criteria 2018 include new requirements to ensure the effective contribution of the RSPO in stopping deforestation. This will be achieved by incorporating the High Carbon Stock Approach (HCSA) Approach Guide into the revised standard.</p> <p>The RSPO ToC also encourages RSPO to commit to balancing between sustainable livelihoods and reducing poverty with the need to conserve, protect and improve the quality of ecosystems.</p> <p>High Forest Cover Countries (HFCC) are in dire need of economic opportunities that can help people choose their own path in carrying out development, while at the same time providing social and economic benefits and safeguards.</p> <p>Procedures will be developed that are adapted to support the development of sustainable palm oil by indigenous peoples and local communities who have legal or customary rights. The procedure will apply in certain HFCC countries and in the High Forest Cover Landscape (HFCL) within it.</p> <p>The development of this procedure will be guided by the No Deforestation Joint Steering Group (NDJSG) between the RSPO and HCSA members. In HFCC countries, RSPO will work with governments, communities and other stakeholders to develop this procedure through participatory processes at national and regional levels. The duration of this activity is specified in the Terms of Reference for NDJSG and is publicly available.</p>			
7.12.1	<p>(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCV or HCS forests.</p> <p>Historical analysis of Land Use Change Analysis (LUCA) is carried out before any new land clearing, in accordance with the RSPO LUCA Guidance document (see indicator 7.12.2).</p>	<p>There is no new planting within certified area of PT Inti Indosawit Subur – Buatan Estate and Buatan Plasma after November 2005. Buatan Estate has planted since 1988 – 1991 while Buatan Plasma has planted since 1988 - 1992. Currently, replanting activities are still in progress. Replanting has been started since 2014 – 2020 and still continue until 2024.</p> <p>This indicator not applicable.</p>	Complied
7.12.2	<p>(C) HCV and HCS forests, and other conservation areas are identified as follows:</p> <p>7.12.2a) For existing plantations, with an HCV assessments conducted by RSPO- approved assessors and have no new land clearing after 15 November 2018, the existing HCV assessments remains valid.</p>	<p>Buatan Estate and Scheme Smallholder:</p> <p>PT Inti Indosawit Subur – Buatan Estate has conducted the HCV identification in coordination with “Fakultas Kehutanan Institut Pertanian Bogor” on March – April 2009, under “Laporan Final Kajian Penuh Identifikasi dan Analisis Keberadaan High Conservation Value di Areal PT Inti Indosawit Subur, Kebun Buatan Provinsi Riau”. The HCV assessment conducted based on “Panduan Kawasan Bernilai Konservasi Tinggi di</p>	Complied

		<p>Indonesia”, issued by Konsorsium Revisi HCV Toolkit Indonesia dated 12/07/2008. HCV Assessor from Forestry Faculty of IPB is RSPO Approved Assessor.</p> <p>Based on HCV identification total HCV area identified was 55.56 ha in Buatan Estate. Buatan Estate is divided in two supply base: Division I, II and III as supply base Buatan I POM and Division IV, V and VI as supply base Buatan II POM (currently the estate name was Simpang Perak Estate). So that the HCV area in Division I, II and III as supply base Buatan I POM was 27.78 ha.</p> <p>HCV identified in Buatan I Estate consist of:</p> <ul style="list-style-type: none"> - HCV 1.1, 1.2 and 4.1: Riparian zone Kerinci Besar River (38.9 Ha); - HCV 1.1, 1.2 and 4.1: Riparian zone Laniago River (4.50 Ha); - HCV 1.2 and HCV 6: Conservation forest for Manggeris trees (Pohon Madu): 10.5 Ha; - HCV 1.2 and HCV 6: Conservation forest for Manggeris trees (Pohon Madu): 3.60 Ha; - HCV 6: ancient graveyard: 0.66 Ha; <p>HCV identification was consulted to the relevant stakeholder and HCV map is available in place. HCV assessment also including Buatan Smallholder area and used in scheme smallholder operation.</p> <p>The HCV identification document has explained the general condition of landscape surrounding company’s plantation: there is no protected forest/ecosystem that feasible for wildlife to maintain its viability. Therefore no recommendation for wildlife corridor.</p>	
	<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.</p>	<p>There is no new planting within certified area of PT Inti Indosawit Subur – Buatan Estate and Buatan Plasma after November 2005. Buatan Estate has planted since 1988 – 1991 while Buatan Plasma has planted since 1988 - 1992. Currently, replanting activities are still in progress. Replanting has been started since 2014 – 2020 and still continue until 2024.</p>	

	This includes stakeholder consultation and take into account wider landscape- level consideration.	This indicator not applicable.	
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.	There is no new planting within certified area of PT Inti Indosawit Subur – Buatan Estate and Buatan Plasma after November 2005. Buatan Estate has planted since 1988 – 1991 while Buatan Plasma has planted since 1988 - 1992. Currently, replanting activities are still in progress. Replanting has been started since 2014 – 2020 and still continue until 2024. This indicator not applicable.	Complied
PROCEDURAL NOTE for 7.12.3: Indicator 7.12.3. is not relevant to Indonesia, until further decisions by the RSPO.			
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).	There is no new planting within certified area of PT Inti Indosawit Subur – Buatan Estate and Buatan Plasma after November 2005. Buatan Estate has planted since 1988 – 1991 while Buatan Plasma has planted since 1988 - 1992. Currently, replanting activities are still in progress. Replanting has been started since 2014 – 2020 and still continue until 2024. PT Inti Indosawit Subur – Buatan Estate has develop the Conservation Management Plan 2021 and 2022. Evidence Continous monitoring documentation and report regarding the status of RTE species and HCV presented in “Laporan Monitoring tumbuhan dan Satwaliar PT Inti Indosawit Subur, Kebun Buatan 2021 and 2022”. Monitoring documentation such as: “Daftar Temuan Satwa liar di Areal kebun” contain information regarding result of wildlife and RTE species monitoring, “Tabel Monitoring Kerusakan Kawasan Lindung” contain information regarding result of HCV area monitoring and HCV condition monitoring such as illegal hunting, HCV area disturbance, and HCV condition. Latest monitoring both RTE species and HCV area conducted on December 2021. Sample seen: Wildlife monitoring in Block F89b period December 2021, found presence of animal such as: <i>Bucerotidae</i> , <i>Orthotmus sp</i> , <i>Prinia familiaris</i> , <i>Macaca fascicularis</i> , <i>Tupaia tana</i> . Monthly monitoring of	Complied

		<p>HCV area condition and animal species also performed by Foreman HCV (Adi Surya P) and each Foreman Afdeling, animal presence recorded in "Daftar Temuan Satwa Liar.</p> <p>Evaluation the effectiveness of management and monitoring plan implementation reported each semester in "laporan Monitoring tumbuhan dan Satwaliar PT Inti Indosawit Subur, Kebun Buatan". Evaluation result and recommendation of management and monitoring contain in the report. This recommendation give the feedback and improvement to conservation management plan.</p> <p>Company also has implemented appropriate sanction disciplinary measures to any individual working for the company who is found to capture, harm, collect or kill these species. Sanction and process based on UU No. 5 tahun 1990. Based on interview with worker representative and field workers – workers have understand protection of plant and animal. The workers also aware of company policy prohibits hunting, raising and killing protected animal.</p> <p>Scheme Smallholder:</p> <p>Each KUD has appointed person in charge to monitor the RTE species presence in smallholder plantation area:</p> <ul style="list-style-type: none"> - KUD Sumber Rezeki: Surat Keputusan Pengurus KUD Sumber Rezeki Nomor: /Kpts/KUD SR/VII/2019 dated 13 July 2019 Tentang Penunjukan atau Pengangkatan Petugas Perlindungan dan Pengawasan Satwa Liar dan Tumbuhan Dilindungi. appointed person: Sumarlan. - KUD Jaya Makmur: Surat Keputusan Pengurus KUD Jaya Makmur Nomor: /Kpts/KUD JM/VII/2018 dated 10 July 2018 Tentang Penunjukan atau Pengangkatan Petugas Perlindungan dan Pengawasan Satwa Liar dan Tumbuhan Dilindungi. appointed person: Mahyun. - KUD Bhakti Mandiri: Surat Keputusan Pengurus KUD Bhakti Mandiri Nomor: /Kpts/KUD BM/VII/2018 dated 10 July 2018 Tentang 	
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		<p>Penunjukan atau Pengangkatan Petugas Perlindungan dan Pengawasan Satwa Liar dan Tumbuhan Dilindungi. appointed person: Jumari.</p> <ul style="list-style-type: none"> - KUD Sejahtera: Surat Keputusan Pengurus KUD Sejahtera Nomor: 01/Kpts/V/2018 dated 10 July 2018 Tentang Penunjukan atau Pengangkatan Petugas Perlindungan dan Pengawasan Satwa Liar dan Tumbuhan Dilindungi. appointed person: Sejahtera. <p>Monitoring for RTE species performed each month by PIC. Result of monitoring presented in "Daftar Temuan Satwa Yang Dilindungi Tahun 2021" and year 2022. During January – December 2021 and January – ytd June 2022, shown that in KUD Jaya Makmur, KUD Bhakti Mandiri, KUD Sejahtera and KUD Sumber Rezeki there were presence of animal such as: Sanca Bodo (<i>Python bivittatus</i>), Kucing hutan (<i>Prionailurus bengalensis</i>), Biawak (<i>Varanus salvator</i>), Elang Tikus (<i>Elanus caeruleus</i>), Burung Madu (<i>Nectarinia jugularis</i>) and Cekakak Belukar (<i>Halcyon smyrnensis</i>).</p>	
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.	<p>There is no new planting within certified area of PT Inti Indosawit Subur – Buatan Estate and Buatan Plasma after November 2005. Buatan Estate has planted since 1988 – 1991. Currently, replanting activities are still in progress. Replanting has been started since 2014 – 2020 and still continue until 2024.</p> <p>This indicator not applicable.</p>	Complied
7.12.6	All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.	<p>PT. Inti Indosawit Subur – Buatan I POM and Estate has a program to socialize the status of protected, rare, threatened or endangered (RTE) to all workers, it was also programed each year as per "Conservation Management Plan". Socialization has been conducted through master morning in each division by field assistant, latest refreshment to workers on 4 – 9 May 2022. Company also provides signboard regarding HCV protection and RTE species protection in the strategic place as a campaign to give awareness to the workers/people.</p> <p>Company also impelemented appropriate sanction disciplinary measures to any individual working for the company who is found to capture, harm,</p>	Complied

		<p>collect or kill these species. Sanction and process based on UU No. 5 tahun 1990.</p> <p>Interview with workers regarding their understanding on RTE species protection will be conducted during onsite audit later.</p> <p>Smallholder:</p> <p>Training & Socialization has been provided to the individual members about the status of HCV and RTE species and the applicable disciplinary measures. Training was conducted in each KUD by plasma management on November 2021. The training and socialization was attend by smallholder member representative and KUD official from each KUD, the venue of training was in each KUD office. Minutes of training and attendant list were available.</p> <p>During onsite audit and interview with smallholder member confirmed that they have sufficient understanding on RTE species protection and prohibition of illegal hunting.</p>	
7.12.7	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>There is no new planting within certified area of PT Inti Indosawit Subur – Buatan Estate and Buatan Plasma after November 2005. Buatan Estate has planted since 1988 – 1991. Currently, replanting activities are still in progress. Replanting has been started since 2014 – 2020 and still continue until 2024.</p> <p>This indicator not applicable.</p>	Complied
7.12.8	(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>There is no new planting within certified area of PT Inti Indosawit Subur – Buatan Estate and Buatan Plasma after November 2005. Buatan Estate has planted since 1988 – 1991. Currently, replanting activities are still in progress. Replanting has been started since 2014 – 2020 and still continue until 2024.</p> <p>This indicator not applicable.</p>	Complied

Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in 2021 for Buatan I POM and supply base was calculated using the PalmGHG Calculator version 3.0.1. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

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

Emission per product	tCO ₂ e/tProduct
CPO	0.029
PKO	0.29

Extraction	%
OER	17.97
KER	6.75

Production	t/yr
FFB Process	255,346
CPO Produced	48,515
PKO Produced	6,383

Land Use	Ha
OP Planted Area	7,589.19
OP Planted on peat	0
Conservation (forested)	0
Conservation (non-forested)	4.78
Total	7,593.97

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	3,011.12	1.12	0.00	0.00	0.00	0.00	3,021.65	1.21
CO ₂ Emission from fertilizer	13.70	0.01	2,201.14	0.04	0.00	0.00	2,313.34	0.01
NO ₂ Emission	3.32	0.01	2,145.88	0.04	0.00	0.00	2,301.78	0.01
Fuel Consumption	100.05	0.03	560.60	0.01	0.00	0.00	860.24	0.00
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sink								
Crop Sequestration	-3,731.65	-1.21	0.00	0.00	0.00	0.00	-3,470.14	-1.23
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	314.65	0.09	4,941.47	0.09	0.00	0.00	24,452.65	0.09

*Note: Includes both estates and smallholders

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	3,971.16	0.02
Fuel Consumption	165.14	0.00
Grid Electricity Utilization	0.00	0.00
Credit		
Export of Grid Electricity	-342.01	0.00
Sales of PKS	-23,154.30	-0.11
Sales of EFB	0.00	0.00
Total	-21,567.11	-0.09

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO ₂ e
PK from own mill	1,113.42
PK from other source	0.00
Fuel Consumptions	0.00
Total Crusher emissions	1,113.42

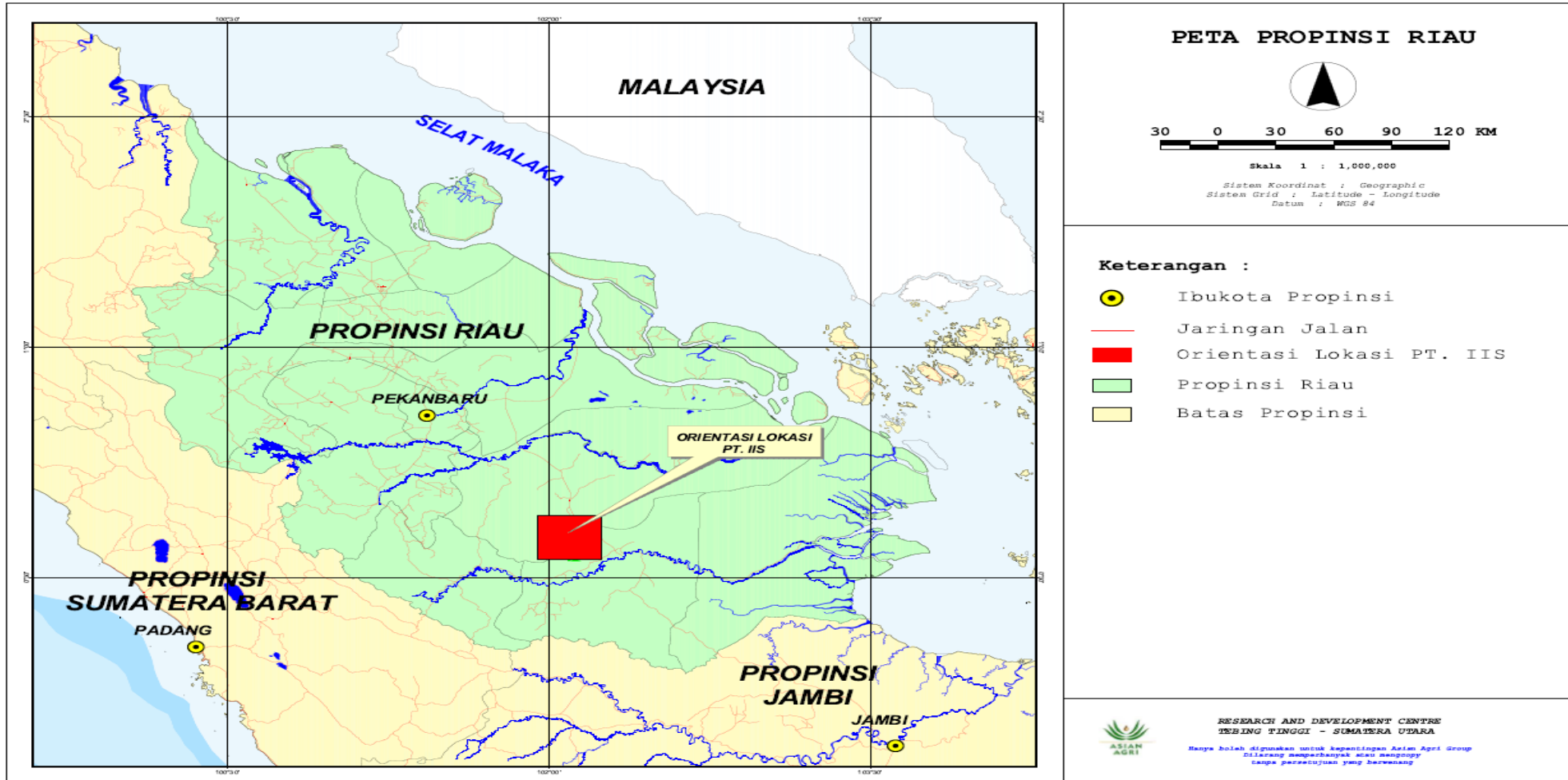
*This mill has no kernel crusher operation.

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

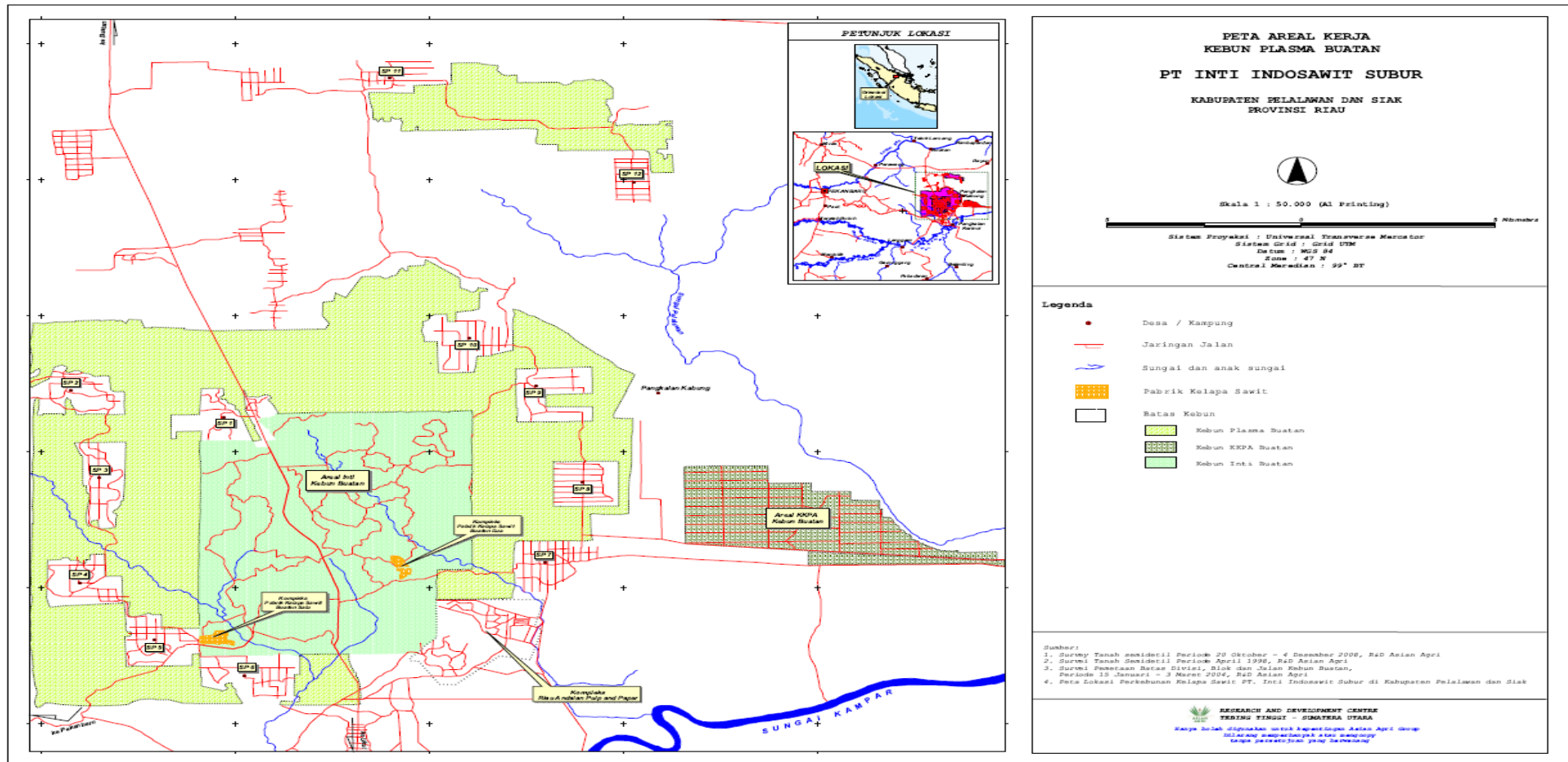
POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	4.12
Divert to methane captured (flaring) (%)	0
Divert to methane captured (energy generation) (%)	95.72

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	KUD	HAMPARAN (KT)	Name of Smallholder	Land Title (SHM) number	Kavling / Block	Certified area (ha)
1	Bhakti Mandiri (17 samples)	28 – Suka Maju	MATNUR	240	652	2.00
			MULYANTO	225	653	2.00
			SODIKIN	241	654	2.00
		30 – Soyo Mekar	MISNATUN	319	629	2.00
			SUPADI	591	630	2.00
			JOHNY	306	631	2.00
			PULASTONO	304	632	2.00
		31 – Tunas Mekar	LEGIMIN	323	677	2.00
			NARISAN	331	678	2.00
			Drs MHD HASAN	329	679	2.00
			AHMAD MABRURI	334	680	2.00
			BUWARI	322	681	2.00
		31 – Sido Dadi	NURHASIM	408	813	2.00
			LOSO	478	814	2.00
			SUNARDI	357	815	2.00
			SUPONO	477	816	2.00
			ISMAN	018	817	2.00
2	Jaya Makmur (17 samples)	39 – Sumber Rejeki	ROHIM	637	895	2.00
			SUGIANTO	550	896	2.00
			SUGIANTO	636	897	2.00
			ABDUL ROHMAN	556	898	2.00
			M. SATUHAN	557	899	2.00
			SUCI	559	900	2.00
		40 – Jaya Kumbara	PURWANTO	522	906	2.00
			SUTARMIN	528	907	2.00
			WARSIMAN	530	908	2.00
			SUPIANTO	641	909	2.00
			Hj. SUKESI	639	910	2.00
			SUMAK	656	911	2.00
		42 – Mekar Sari	NGALWAN	585	944	2.00
			SARI	586	945	2.00
			HERI SUNDOKO	580	946	2.00
			TAJI	578	947	2.00
			SARI	576	969	2.00
3	Sejahtera (17 samples)	70 – Tri Makmur	NARSA	437	2061	2.00
			JUMARI	451	2108	2.00
			GIMUN	444	2109	2.00
			KASMAT	449	2110	2.00
			ERBIN SIMBOLON	399	2111	2.00
			KAMIDI			2.00
			SUPRIYANTO	439	2112	
		75 – Bina Tani	NGATEMIN	464	2455	2.00

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			SUTEKNO	475	2456	2.00
			SURATMAN	460	2457	2.00
			SUPARNO	470	2458	2.00
			ABDUL KODIR	461	2486	2.00
			SURATMO	467	2487	2.00
		108 - Beo	PASARIBU	944	2467	2.00
			MAKSUM	484	2468	2.00
			SARENGAT	488	2469	2.00
			M. HAYAT	949	2470	2.00
			RUSANI	940	2472	2.00
4	Sumber Rejzki (17 samples)	102 – Karya Maju	MULYADI	808	1880	2.00
			SUJARNO	819	1881	2.00
			HAMIDAH	812	1882	2.00
			IYAN SUPRIADI	814	1824	2.00
			SAHNUN	799	1929	2.00
			PRAPTO	813	1930	2.00
		105 – Sawit Indah	SUTEJO	883	2269	2.00
			SUTEJO	871	2270	2.00
			BUYAMIN	877	2271	2.00
			PONIDI	867	2272	2.00
			DADAN	860	2273	2.00
			PONIDI	884	2274	2.00
		75 – Bina Tani	ABDUL KODIR	461	2487	2.00
			SURATMO	467	2488	2.00
			SUJONO	481	2489	2.00
			AGUS MIRAN	480	2490	2.00
			TURA	477	2491	2.00

Appendix F: List of Abbreviations

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