

**RSPO PRINCIPLE AND CRITERIA  
PUBLIC SUMMARY REPORT**

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

<b>Client Company Name / Parent Company:</b> <b>PT. Inti Indosawit Subur</b>
Client Company / Parent Company Address: Jl Palembang Kav. 35 – 37, Jakarta Pusat 10230, DKI Jakarta, Indonesia
Certification Unit: <b>PT Inti Indosawit Subur – Tungkal Ulu Palm Oil Mill</b>
Location of Certification Unit: Merlung Village, Merlung District, Tanjung Jabung Barat Regency, 36552 Jambi Province, Indonesia
Date of Final Report: 31/10/2023

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## Section 1: Scope of the Assessment

1. Company Details			
<b>Parent Company</b>	PT. Inti Indosawit Subur		
<b>RSPO Membership Number</b>	1-0022-06-000-00	<b>Membership Approval Date</b>	6 <sup>th</sup> February 2006
<b>Address</b>	Jl Palembang Kav. 35 – 37, Jakarta Pusat 10230, DKI Jakarta, Indonesia		
<b>Palm Oil Mill / Group Manager / Estate (Certification Unit)</b>	PT. Inti Indosawit Subur - Tungkal Ulu Palm Oil Mill		
<b>Location / Address</b>	Merlung Village, Merlung District, Tanjung Jabung Barat Regency, 36552 Jambi Province, Indonesia		
<b>Website</b>	<a href="http://www.asianagri.com">www.asianagri.com</a>		
<b>Management Representative</b>	Ivan Novrizaldie	<b>E-mail</b>	<a href="mailto:Ivan_Novrizaldie@asianagri.com">Ivan_Novrizaldie@asianagri.com</a>
<b>Telephone</b>	+62 21-2301119	<b>Facsimile</b>	+62 21-2301120

2. Certification Information			
<b>Certificate Number</b>	RSPO 594422	<b>Certificate Start Date</b>	15/08/2022
<b>Date of First Certification</b>	15/08/2012	<b>Certificate Expiry Date</b>	14/08/2027
<b>Scope of Certification</b>	Production of Sustainable Crude Palm Oil (CPO) and Palm Kernel (PK)		
<b>Visit Objectives</b>	<ul style="list-style-type: none"> <li>• Determination of the conformity of the client's management system, or parts of it, with audit criteria.</li> <li>• Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements.</li> </ul>		
<b>Assessment Cycle</b>	<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		
<b>Applicable Standards / Normative Reference</b>	RSPO Certification System for P&C and RSPO ISH 2020 <input type="checkbox"/> RSPO P&C 2018 for the Production of Sustainable Palm Oil <input checked="" type="checkbox"/> Indonesia National Interpretation 2020 for RSPO P&C 2018 for the Production of Sustainable Palm Oil		
<b>Supply Chain Module</b>	<input type="checkbox"/> Identity Preserved; <input checked="" type="checkbox"/> Mass Balance	<b>Mill Capacity</b>	60 MT/hour
<b>ISH certification Phase</b>	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		
<b>Is this a remote audit or on-site audit</b>	<input checked="" type="checkbox"/> On-site audit (Option AI)	<input type="checkbox"/> On-site audit (Option AII)	<input type="checkbox"/> Remote audit (Option B)

<b>3. Other Certifications</b>			
<b>Certificate Number</b>	<b>Standard(s)</b>	<b>Certificate Issued by</b>	<b>Expiry Date</b>
ID05/65250	ISO 14001:2004	SGS	10/06/2026
EU-ISCC-Cert-DE100-01641123	ISCC EU	SGS	31/08/2024
SGS-ID-ISPO-0032	ISPO	SGS	21/03/2024

<b>4. Location(s) of Mill &amp; Supply Bases</b>			
<b>Name (Mill / Supply Base / Group Manager / Smallholders)</b>	<b>Location</b>	<b>GPS Coordinates</b>	
		<b>Latitude</b>	<b>Longitude</b>
Tungkal Ulu POM	Merlung Village, Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia	01° 18' 01.00" S	102° 58' 53.00" E
Tungkal Ulu Estate	Merlung Village, Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia	01° 17' 18.00" S	102° 56' 54.00" E
KUD Bina Usaha	Cinta Damai Village (SP-1), Renah Mendaluh District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia	01°20' 23.50" S	102°55' 03.90" E
KUD Sawit Kita	Lampisi Village (SP-2), Renah Mendaluh District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia	01°19' 01.50" S	102°56' 58.90" E
KUD Karya Kita	Tanjung Benanak Village (SP-3), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia	01°20' 40.10" S	102°58' 16.30" E
KUD Karya Jaya	Bukit Harapan Village (SP-4), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia	01°20' 54.60" S	103° 00' 18.61" E
KUD Panca Mukti	Pinang Gading Village (SP-5), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia	01°19' 09.80" S	103°04' 01.10" E
KUD Sari Bumi	Adipurwa Village (SP-6), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia	01°21' 50.40" S	103°02' 39.30" E
Koperasi Manunggal Jaya	Adipurwa Village (SP-6), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia	01°21' 45.00" S	103°01' 38.10" E
KUD Sawit Mulia	Intan Jaya Village (SP-7), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia	01°20' 36.00" S	103°05' 38.90" E

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KUD Agro Makmur	Bukit Indah Village (SP-8), Muara Papalik District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia	01°19' 16.90" S	103°07' 40.60" E
KUD Harapan Jaya	Kemang Manis Village (SP-9), Muara Papalik District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia	01°19' 15.90" S	103°10' 05.00" E
<b>Notes: -</b>			

<b>5. Description of Supply Base</b>					
<b>New Planting Development</b>	<input checked="" type="checkbox"/> No (no change in total planted area)		<input type="checkbox"/> Yes (please refer to Principle 7 for details)		
<b>Estate / Smallholders</b>	<b>Total Planted (Mature + Immature) (ha)</b>	<b>HCV + HCS (ha)</b>	<b>Infrastructure &amp; Other (ha)</b>	<b>Total Area (ha)</b>	<b>% of Planted</b>
Tungkal Ulu Estate	4,323	128.32	104.68	4,556	94.89
KUD Bina Usaha (450 smallholders)	910	0	0	910	100
KUD Sawit Kita (506 smallholders)	1,028	0	0	1,028	100
KUD Karya Kita (579 smallholders)	1,168	0	0	1,168	100
KUD Karya Jaya (399 smallholders)	810	0	0	810	100
KUD Panca Mukti (384 smallholders)	792	0	0	792	100
KUD Sari Bumi (377 smallholders)	764	0	0	764	100
Koperasi Manunggal Jaya (104 smallholders)	208	0	0	208	100
KUD Sawit Mulia (676 smallholders)	1,362	0	0	1,362	100
KUD Agro Makmur (560 smallholders)	1,130	0	0	1,130	100
KUD Harapan Jaya (560 smallholders)	1,130	0	0	1,130	100
<b>Total</b>	<b>13,625</b>	<b>128.32</b>	<b>104.68</b>	<b>13,858</b>	

<b>6. Plantings &amp; Cycle</b>						
<b>Estate / Smallholders</b>	<b>Age (Years) - ha</b>				<b>Mature</b>	<b>Immature</b>
	<b>0 - 3</b>	<b>4 - 14</b>	<b>15 - 25</b>	<b>&gt;25</b>		
Tungkal Ulu Estate	1,192	2,168	43	920	3,131	1,192
KUD Bina Usaha (450 smallholders)	714	0	0	196	196	714
KUD Sawit Kita (506 smallholders)	702	0	0	326	326	702
KUD Karya Kita (579 smallholders)	578	0	0	590	590	578
KUD Karya Jaya (399 smallholders)	364	424	0	22	446	364
KUD Panca Mukti (384 smallholders)	570	0	0	222	222	570
KUD Sari Bumi (377 smallholders)	10	0	0	754	754	10
Koperasi Manunggal Jaya (104 smallholders)	202	0	0	6	6	202
KUD Sawit Mulia (676 smallholders)	-	0	0	1,362	1,362	-
KUD Agro Makmur (560 smallholders)	1,056	0	0	74	74	1,056
KUD Harapan Jaya (560 smallholders)	888	0	0	242	242	888
<b>Total (ha)</b>	<b>6,276</b>	<b>2,592</b>	<b>43</b>	<b>4,714</b>	<b>7,349</b>	<b>6,276</b>

**Note:** \*\*Only Mature area is considered as production area

<b>7. Summary of Certified Tonnage of FFB (Own Certified Scope)</b>				
<b>Estate / Smallholders</b>	<b>Tonnage (MT) / year</b>			
	<b>Estimated last year (Aug 2022-Jul 2023)</b>	<b>Actual (Aug 2022 – May 2023)</b>		<b>Forecast (Aug 2023 – Jul 2024)</b>
		Previous license period (N/A)	Current license period (Aug 2022 – May 2023)	
Tungkal Ulu Estate	78,170	-	50,283.82	86,575.47
KUD Bina Usaha (450 smallholders)	1,680	-	3,859.94	392.00
KUD Sawit Kita (506 smallholders)	1,078	-	0.00*	2,651.00

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KUD Karya Kita (579 smallholders)	5,638	-	5,291.84	6,734.00
KUD Karya Jaya (399 smallholders)	208	-	1,097.84	6,803.00**
KUD Panca Mukti (384 smallholders)	4,174	-	3,378.55	1,256.00
KUD Sari Bumi (377 smallholders)	16,639	-	12,561.26	13,362.00
Koperasi Manunggal Jaya (104 smallholders)	0	-	0.00	96.00
KUD Sawit Mulia (676 smallholders)	14,423	-	14,760.69	12,843.76
KUD Agro Makmur (560 smallholders)	1,342	-	1,101.84	1,165.00
KUD Harapan Jaya (560 smallholders)	4,288	-	3,535.63	4,051.00
<b>Total</b>	<b>127,640</b>		<b>95,871.41</b>	<b>135,929</b>

**Note:**

- \*) KUD Sawit Kita during Aug 2022 – May 2023 did not send FFB to the Tungkal Ulu POM, due to distance problems. Currently, the plasma is still asking for the 2023-2024 period for FFB to still be sent to maintain certification status.
- \*\*) As for the land area in several plots of smallholders per Aug'23 will be converted as mature area, the total of mature area will be 424 Ha and immature area 364 Ha, the estimated production is 6,803 MT or 16.04 MT FFB/ha/year.

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

Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Aug 2022-Jul 2023)	Actual (Aug 2022 – May 2023)		Forecast (Aug 2023 – Jul 2024)
		Previous license period (N/A)	Current license period (Aug 2022 – May 2023)	
N/A		Nil	Nil	
<b>Total</b>		<b>Nil</b>		

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

Out growers / smallholders	Tonnage (MT) / year			
	Estimated last year (Aug 2022-Jul 2023)	Actual (Aug 2022 – May 2023)		Forecast (Aug 2023 – Jul 2024)
		Previous license period (N/A)	Current license period (Aug 2022 – May 2023)	
Third Party Supplier	N/A	-	186,158.84	N/A

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<b>Total</b>	<b>186,158.84</b>
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<b>9A. Monthly Records of Certified and Uncertified FFB Received since the last audit</b>				
No.	Month - Year	Volume of FFB from certified supply base (MT)	Volume of FFB from uncertified supply base (MT)	Total FFB/Month (MT)
1	August 2022	12,216.02	26,634.60	38,850.63
2	September 2022	11,046.37	26,390.82	37,437.19
3	October 2022	9,877.68	22,731.09	32,608.77
4	November 2022	10,854.65	20,202.89	31,057.55
5	December 2022	10,498.01	17,519.00	28,017.01
6	January 2023	8,801.83	13,606.50	22,408.33
7	February 2023	8,142.23	10,379.73	18,521.96
8	March 2023	7,440.04	13,497.09	20,937.13
9	April 2023	7,128.29	13,405.13	20,533.42
10	May 2023	9,866.29	21,791.98	31,658.27
<b>TOTAL</b>		<b>95,871.41</b>	<b>186,158.84</b>	<b>282,030.25</b>

<b>10. Summary of Certified Tonnage (MT) (not applicable for ISS)</b>			
Estimated last year (Aug 2022-Jul 2023)	Actual (Aug 2022 – May 2023)		Forecast (Aug 2023 – Jul 2024)
	Previous license period (N/A)	Current license period (Aug 2022 – May 2023)	
<b>FFB</b>	<b>FFB</b>		<b>FFB</b>
109,403 mt	0	95,871.41 mt	135,929 mt
	<b>TOTAL</b>	95,871.41 mt	
<b>CPO (OER: 21.86 %)</b>	<b>CPO (OER: 14.44 %)</b>		<b>CPO (OER: 16.97 %)</b>
23,913 mt	0	13,847.98 mt	23,074 mt
	<b>TOTAL</b>	13,847.98 mt	
<b>PK (KER: 5.25 %)</b>	<b>PK (KER: 3.42 %)</b>		<b>PK (KER: 4.10 %)</b>
5,744 mt	0	3,276.89 mt	5,571 mt
	<b>TOTAL</b>	3,276.89 mt	



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<b>10A. Monthly Records of Certified CPO &amp; PK since the last audit</b>			
<b>No.</b>	<b>Month - Year</b>	<b>Certified CPO (MT)</b>	<b>Certified PK (MT)</b>
1	August 2022	1,879.05	426.16
2	September 2022	1,596.41	373.43
3	October 2022	1,334.48	313.27
4	November 2022	1,544.88	364.56
5	December 2022	1,485.18	358.83
6	January 2023	1,203.41	285.84
7	February 2023	1,160.57	276.66
8	March 2023	986.79	238.39
9	April 2023	1,076.39	262.36
10	May 2023	1,580.82	377.39
<b>TOTAL</b>		<b>13,847.98</b>	<b>3,276.89</b>

<b>11. Summary of Actual Volume sold</b>					
<b>Current License period (Aug 2022 – May 2023)</b>					
	<b>RSPO Certified</b>	<b>Other Schemes Certified</b>		<b>Conventional</b>	<b>Total</b>
		<b>ISCC</b>	<b>Others</b>		
<b>CPO (MT)</b>	1,761.10	12,076.35	0	0	13,837.45
<b>PK (MT)</b>	2,849.07	0	0	0	2,849.07
<b>Credits</b>	-	-	-	-	-
<b>Previous License period (N/A)</b>					
<b>CPO (MT)</b>	0	0	0	0	0
<b>PK (MT)</b>	0	0	0	0	0
<b>Credits</b>	0	0	0	0	0
<b>Note:</b>					

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11A. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any)				
No.	Buyers Name	PalmTrace Trading License Number	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	PT. IIS – KCP Tungkal Ulu	-	-	2,849.07
2	PT. Sari Dumai Sejati	-	1,280.74	-
3	PT. Asianagro Agung Jaya	-	480.36	-
<b>TOTAL</b>			<b>1,761.10</b>	<b>2,849.07</b>

11B. Records of certified CPO & PK Sold under other schemes since the last audit (if any) (Aug 2022 – May 2023)				
No.	Buyers Name	Scheme Name	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	PT. Sari Dumai Sejati	ISCC	12,076.35	-
<b>TOTAL</b>			<b>12,076.35</b>	<b>-</b>

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

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
	Nil	N/A	N/A
<b>TOTAL</b>			<b>N/A</b>

12. Independent Smallholders Certified Tonnage (MT) / Volume									
Phase	Estimated last year (N/A)			Actual (N/A)			Forecast (N/A)		
	Eligibility	MS A	MS B	Eligibility	MS A	MS B	Eligibility	MS A	MS B
	40%	70%	100%	40%	70%	100%	40%	70%	100%
FFB			N/A			N/A			N/A
IS-CSPO									
IS-CSPKO									

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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)
	N/A	N/A	N/A	N/A	N/A	N/A
<b>TOTAL</b>		<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>

**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
<b>Current License period (N/A)</b>							
Credits							
Physical							
<b>Previous License period (N/A)</b>							
Credits							
Physical							

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

## Section 2: Assessment Process

### Certification Body:

BSI Services Malaysia Sdn. Bhd. (ASI Accreditation Number: ASI-ACC-067)

Suite 29.01 Level 29, The Gardens North Tower,

Mid Valley City, Lingkaran Syed Putra,

59200 Kuala Lumpur, Malaysia.

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BSI is a leading global provider of management systems assessment and certification, with more than 92,000 certified locations and clients in over 193 countries. BSI is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (ASI-ACC-067) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia.

### 2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on **21-24 and 26-27 June 2023**. The audit programme is included as Section 2.3. Where applicable, prior to the initial certification and recertification audit, 30 days Public Notification was made through the RSPO and BSI website on provide date.

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

The Critical NC close out on-site assessment was conducted on **16 August 2023**. The audit programs are included in Section 2.3.

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

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

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

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

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

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

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

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

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

<b>Assessment Program</b>					
<b>Name (Mill / Supply Base)</b>	<b>Year 1 (Recertification 2)</b>	<b>Year 2 (ASA 2-1)</b>	<b>Year 3 (ASA 2-2)</b>	<b>Year 4 (ASA 2-3)</b>	<b>Year 5 (ASA 2-4)</b>
Tungkal Ulu POM	X	X	X	X	X
Tungkal Ulu Estate	X	X	X	X	X
KUD Bina Usaha	X				X
KUD Sawit Kita	X		X		
KUD Karya Kita		X		X	
KUD Karya Jaya		X		X	
KUD Panca Mukti	X		X		
KUD Sari Bumi		X		X	
Koperasi Manunggal Jaya	X			X	
KUD Sawit Mulia		X			X
KUD Agro Makmur			X		X
KUD Harapan Jaya			X		X

**Tentative Date of Next Visit: August 1, 2024 - August 11, 2024**

**Total Number of Mandays: 32.5 mandays**

**2.2 BSI Assessment Team**

Name	Role	Competency
Nanang Rusmana (NR)	Team Leader	<p><b>Education:</b> Holds a Bachelor Degree of Forestry, Bogor Agricultural University (IPB)</p> <p><b>Work Experience:</b> 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 HSE Coordinator with PT. Kapuas Prima Coal Group. 7 years working experience as RSPO/ISPO auditor.</p> <p><b>Training attended:</b> 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&amp;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, RSPO Independent Smallholder Training by RSPO Secretariat, and Endorsed RSPO Refresher Courses.</p> <p><b>Language proficiency:</b> Fluent in Bahasa Indonesia and English</p> <p><b>Aspect covered in this audit:</b> During this assessment he assessed on the aspects of Agronomy best management practices, mill best management practices, company policy and continual improvement.</p>
Mujinius Jalaraya (MJ)	Team Member	<p><b>Education:</b> Holds a Bachelor Degree majoring in Forest Resources Conservation and Ecotourism, Bogor Agricultural University (IPB).</p> <p><b>Work Experience:</b> 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><b>Training attended:</b> Completed ISO 9001 Lead Auditor course, ISPO Lead Auditor course, Endorsed RSPO P&amp;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, RSPO Independent Smallholder Training by RSPO Secretariat and Endorsed RSPO Refresher Courses.</p> <p><b>Language proficiency:</b> Fluent in Bahasa Indonesia and English</p> <p><b>Aspect covered in this audit:</b> During this audit, he assessed on OHS, RSPO Supply Chain requirement, Continual improvement.</p>
Edy Widodo (EW)	Team Member	<p><b>Education:</b> Holds a Bachelor Degree majoring Agricultural Technology from University of Padjadjaran, Bandung.</p> <p><b>Work Experience:</b> 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><b>Training attended:</b> 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&amp;C Lead Auditor Course, SMETA Requirements Training, Introductory Course for High Conservation Value and High Carbon Stock (HCS)</p>

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		<p>in Oil Palm Plantation, RSPO Independent Smallholder Training by RSPO Secretariat, and Endorsed RSPO Refresher Courses.</p> <p><b>Language proficiency:</b> Fluent in Bahasa Indonesia and English</p> <p><b>Aspect covered in this audit:</b> During this audit, he assessed on Policy and commitment, social requirements, contract agreement, human rights, workers' welfare, and Stakeholder consultation.</p>
Eko Prastio Ramadhan (EPR)	Team Member	<p><b>Education:</b> Holds a Bachelor Degree in Forest Resources Conservation and Ecotourism from Forestry Faculty, Bogor Agricultural University (IPB).</p> <p><b>Work Experience:</b> Over 4 years of working experience in biodiversity officer with Birdlife Indonesia and consultant with PT Inoa Konsultindo. Over 2½ years of working experience in palm oil estate with PT Salim Ivomas Pratama Tbk and Capitol Plantation Group implementing sustainability. Over 4½ years of working experience as RSPO P&amp;C Certification Program Manager and auditor covering standard such as RSPO P&amp;C, RSPO SCCS, ISPO, ISO 9001 and ISO 14001.</p> <p><b>Training attended:</b> Completed ISO 14001:2015 Lead Auditor Course, Endorsed RSPO P&amp;C Lead Auditor Course, Social Impact Assessment Training, Endorsed RSPO SCC Auditor Lead Auditor Course, ISPO Auditor Batch 19 Training, ISO 9001 Lead Auditor Course, Identification of HCV Areas Training, RSPO Independent Smallholder Training by RSPO Secretariat, and Endorsed RSPO Refresher Courses.</p> <p><b>Language proficiency:</b> Fluent in Bahasa Indonesia and English</p> <p><b>Aspect covered in this audit:</b> During this audit, he assessed on HCV management and monitoring, Environment responsibility, environment impact assessment and management plan.</p>

**Accompanying Persons:**

Name	Role
None	None

**2.3 Assessment Plan**

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

Date	Time	Subjects	Auditor			
			NR	EPR	MJ	EWD
Wednesday, 21/06/2023	08.00 – 08.30	<p><b>Opening Meeting</b></p> <ul style="list-style-type: none"> <li>Presentation by PT. IIS – Tungkal Ulu POM, Estate and Smallholder</li> <li>Presentation by BSI Indonesia</li> </ul>	√	√	√	√
	08.30 – 12.00	<b>Field Visit to Tungkal Ulu Estate</b>	√	√	√	

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Date	Time	Subjects	Auditor			
			NR	EPR	MJ	EWD
		<ul style="list-style-type: none"> <li>Herbicide application programmes, harvesting, fertilizing operations, water management, road maintenance, terracing, HCV's, riparian zones, etc.</li> <li>Agrochemical stores, Fertilizer store, workshops, housing, landfill, clinic, riparian zones, Hazardous Waste, waste management, etc.</li> <li>Boundaries inspection, worker interviews, social amenities, etc.</li> </ul>				
	09.00 – 12.00	<b>Public Consultation (External)</b> <ul style="list-style-type: none"> <li>Local communities</li> <li>Contractor</li> <li>Governance body</li> </ul>				√
	12.00 – 14.00	<b>Break</b>	√	√	√	√
	14.00 – 16.30	<b>Field Visit to Tungkal Ulu POM</b> <ul style="list-style-type: none"> <li>Occupational Health and Safety, Environment Aspect.</li> <li>Social Aspect and workers welfare, workers interview</li> <li>Best Management Practice for Mill and supply chain for mill.</li> <li>Field implementation for Operation Procedure.</li> <li>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.</li> </ul>	√	√	√	
	14.00 – 16.30	<b>Public Consultation (Internal)</b> <ul style="list-style-type: none"> <li>Union Labour</li> <li>Cooperative</li> <li>Gender committee</li> </ul>				√
	16.30 – 17.00	<b>Wash-up Meeting</b>	√	√	√	√
Thursday, 22/06/2023	08.00 – 12.00	<b>Field Visit to Scheme Smallholder KUD Karya Kita</b> 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. (34 samples)	√	√	√	√



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Date	Time	Subjects	Auditor			
			NR	EPR	MJ	EWD
	12.00 – 14.00	<b>Break</b>	√	√	√	√
	14.00 – 16.30	Document Review for Tungkal Ulu POM and Tungkal Ulu Estate	√	√	√	√
	16.30 – 17.00	<b>Wash-up Meeting</b>	√	√	√	√
Friday, 23/06/2023	08.00 – 12.00	<b>Field Visit to Scheme Smallholder</b> <b>KUD Karya Jaya</b> 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. (34 samples)	√	√	√	√
	12.00 – 14.00	<b>Break</b>	√	√	√	√
	14.00 – 16.30	Document Review for Scheme Smallholder	√	√	√	√
	16.30 – 17.00	<b>Wash-up Meeting</b>	√	√	√	√
Saturday, 24/06/2023	08.00 – 12.00	<b>Field Visit to Scheme Smallholder</b> <b>KUD Sari Bumi</b> 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. (34 samples)	√	√	√	√
	12.00 – 14.00	<b>Break</b>	√	√	√	√
	14.00 – 16.30	Document Review for Tungkal Ulu POM and Tungkal Ulu Estate	√	√	√	√
	16.30 – 17.00	<b>Wash-up Meeting</b>	√	√	√	√
Sunday, 25/06/2023		Holiday (Stay on Site)	√	√	√	√
Monday, 26/06/2023	08.00 – 12.00	<b>Field Visit to Scheme Smallholder</b> <b>KUD Sawit Mulia</b> 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. (34 samples)	√	√	√	√
	12.00 – 14.00	<b>Break</b>	√	√	√	√
	14.00 – 16.30	Document Review for Scheme Smallholder	√	√	√	√

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Date	Time	Subjects	Auditor			
			NR	EPR	MJ	EWD
	16.30 – 17.00	<b>Wash-up Meeting</b>	√	√	√	√
Tuesday, 27/06/2023	08.00 – 10.00	Document review	√	√	√	√
	10.00 – 10.30	Auditor Meeting / Preparation for Closing meeting	√	√	√	√
	10.30 – 12.00	Closing meeting	√	√	√	√

**NCR Close-Out Visit Assessment Plan**

Date	Time	Subjects	NR
Wednesday, 16/08/2023	08.00 – 08.30	<b>Opening Meeting</b> - Presentation by PT. Inti Indosawit Subur Tungkal Ulu POM & Supply bases - Presentation by BSI Indonesia	√
	08.30 – 11.00	<b>PT. Inti Indosawit Subur Tungkal Ulu POM</b> Verifying of correction, root-cause and corrective action (interview, document review and field observation)	√
	10.45 – 11.15	<b>Report Preparation</b>	√
	11.15 – 12.00	<b>Closing Meeting</b>	√

### Section 3: Assessment Findings

#### 3.1 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?	PT Inti Indosawit Subur has explained the certification plan for all of its subsidiaries; indicating all palm oil mills, company-owned estates and scheme smallholder as the supply base.	Complied
Have all the estates and mills certified within five (5) years after obtaining RSPO membership? If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021	There are remaining mill and estate that has not certified yet, Bahilang Estate (Supply bases for Tanah Datar Mill) planned in year 2024 due to still in process of RACP. Teluk Panjie Estate (801ha) as supply bases for Teluk Panjie Mill planned in 2026 due to HGU still in process. Sentral Estate (Supply bases for Gunung Melayu II POM planned in 2024 due to still in process of RACP.  Revision of TBP has been approved by RSPO on 19/04/2023	Complied
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available. If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021.	No, there is no new acquisition conducted by PT Inti Indosawit Subur and its subsidiary.	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	Yes, there is time bound plan revision dated 19 April 2023, signed by Management Representative. Justification available, it caused: <ul style="list-style-type: none"> <li>- Topaz Estate (Supply Bases for Topaz POM) with area 230 Ha the HGU is still on proses to Local Government and BPN Pusat, so the plan year for certification is 2026.</li> <li>- Bahilang Estate (Supply Bases for Tanah Datar Mill) with area 1,019 Ha the concept note still on progress and submit to RACP team at Q2 2023. Target to conduct audit at Q1 2024.</li> <li>- Teluk Panji Estate (Supply Bases for Teluk Panjie POM) with area 801 Ha the HGU still on progress since the estate under 2 different provinces, the final approval must come from National Authority (BPN Pusat). Target to conduct audit in 2026.</li> <li>- Sentral Estate (Supply Bases for Gunung Melayu II POM) with area 2,996 Ha. Concept Note still</li> </ul>	Complied

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	<p>on Progress and submit to RaCP team at Q2 2023. Target to conduct audit at Q1 2024.</p> <p>Revision of TBP has been approved by RSPO on 19/04/2023</p>	
<p>Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required.</p> <p>Is this consistent with the ACOP reporting?</p>	<p>Yes, there is time bound plan revision dated 19 April 2023, signed by Management Representative. Justification available, it caused:</p> <ul style="list-style-type: none"> <li>- Topaz Estate (Supply Bases for Topaz POM) with area 230 Ha. the HGU is still on proses to Local Government and BPN Pusat, so the plan year for certification is 2026.</li> <li>- Bahilang Estate (Supply Bases for Tanah Datar Mill) with area 1,019 Ha the concept note still on progress and submit to RACP team at Q2 2023. Target to conduct audit at Q1 2024.</li> <li>- Teluk Panji Estate (Supply Bases for Teluk Panjie POM) with area 801 Ha the HGU still on progress since the estate under 2 different provinces, the final approval must come from National Authority (BPN Pusat). Target to conduct audit in 2026.</li> <li>- Sentral Estate (Supply Bases for Gunung Melayu II POM) with area 2,996 Ha. Concept Note still on Progress and submit to RaCP team at Q2 2023. Target to conduct audit at Q1 2024.</li> </ul> <p>Revision of TBP has been approved by RSPO on 19/04/2023</p>	Complied
<p>Have there been any isolated lapses in implementation of the plan? If yes a <b>Minor</b> 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 RaCP process in Bahilang Estate and Sentral Estate and HGU issuance for Teluk Panji Estate and Topaz Estate.</p>	Complied
<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 <b>Major</b> 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 obtain the HGU for Teluk Panji Estate and Topaz Estate.</p>	Complied
<p><b>Un-Certified Units or Holdings</b></p>		
<p>No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&amp;C criterion 7.12.</p>	<p>According to Land Use change analysis, there are several area conversion cacao plantation in Bahilang Estate and Sentral Estate, no primary forest.</p> <p>Bahilang Estate (PT Nusa Pusaka Kencana/NPK). RaCP still under Process. Concept Note still on Progress and submit to RaCP team at Q2 2023. Target to conduct audit at Q1 2024.</p>	Complied

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	<p>Sentral Estate (PT Gunung Melayu). RaCP still under Process. Certification audit will be planned on 2024. 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. There is an email from RSPO Secretariat on 10/06/2023 related to "PT IIS Review (Annex 7/8)". The email was explained that Sentral Estate (PT Gunung Melayu) to submit Annex 7.</p> <p>Teluk Panji Estate. HGU for this unit has not been obtained and still under process. Certification audit will be planned on 2026. Latest updated April 2023, HGU still on Progress, since the estate under 2 different provinces, the final approval must come from National Authority (BPN Pusat).</p> <p>Revision of TBP has been approved by RSPO on 19/04/2023.</p>	
<p>Any new plantings since January 1<sup>st</sup> 2010 shall comply with the RSPO New Plantings Procedure.</p>	<p>According to Land Use change analysis, there are several area conversion cacao plantations in Bahilang Estate and Sentral Estate, no primary forest.</p> <ul style="list-style-type: none"> <li>• Bahilang Estate (PT Nusa Pusaka Kencana/NPK). RaCP still under Process. Concept Note still on Progress and submit to RaCP team at Q2 2023. Target to conduct audit at Q1 2024.</li> <li>• Sentral Estate (PT Gunung Melayu). RaCP still under Process. Certification audit will be planned on 2024. 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.</li> <li>• Teluk Panji Estate. HGU for this unit has not been obtained and still under process. Certification audit will be planned on 2026. Latest updated April 2023, HGU still on Progress, since the estate under 2 different provinces, the final approval must come from National Authority (BPN Pusat).</li> <li>• Topaz Estate (Supply Bases for Topaz POM) with area 230 Ha. the HGU is still on proses to Local Government and BPN Pusat, so the plan year for certification is 2026.</li> </ul>	<p>Complied</p>
<p>Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&amp;C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.</p>	<p>According to internal audit result in 2022, there is no land conflict occur in Bahilang Estate, Sentral Estate, Teluk Panji Estate, and Topaz Estate. In addition, the company has been certified for ISPO (Indonesian Sustainable Palm Oil) since December 2016.</p>	<p>Complied</p>

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	<p>According to the RSPO RaCP tracker (<a href="https://www.rspo.org/certification/remediation-and-compensation/racp-tracker">https://www.rspo.org/certification/remediation-and-compensation/racp-tracker</a>) update 01 September 2022, PT Inti Indosawit Subur has:</p> <ul style="list-style-type: none"> <li>• MU's with potential liabilities: 4 units</li> <li>• LUCA Submitted (MUs): 4 units</li> <li>• LUCA review completed (MUs): 4 units</li> <li>• Concept Note required (MUs): 3 units</li> <li>• Concept Note submitted (MUs): 2 units</li> <li>• Concept Note approved (MUs): 2</li> <li>• Concept Note submitted (MUs): 2</li> <li>• Concept Note endorsed (MUs): 0</li> <li>• Remediation Plan required (MUs): 4 units</li> <li>• Remediation Plan submitted (MUs): 0</li> <li>• Remediation Plan approved (MUs): 0</li> </ul> <p>The progress of Remediation Plan Submission as follow up email on 10/06/2023 by the company namely:</p> <ul style="list-style-type: none"> <li>• PT MUP (3 Units): Annex 7 Approve, Annex 8 will resubmit (refers to email 10/06/2023).</li> <li>• PT GM (1 Units): Annex 7 submit together with PT MUP (10/06/2023).</li> </ul>	
<p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&amp;C criterion 4.2</p>	<p>Internal audit has conducted for 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>Besides that, interview with management representative who assign as PIC for certification was conducted to know the process of internal audit that has been held.</p> <p>There are no ongoing case/s of grievances or complaint based on RSPO Complaint tracker (<a href="https://askrspo.force.com/Complaint/s/casetracker">https://askrspo.force.com/Complaint/s/casetracker</a>)</p>	<p>Complied</p>
<p>Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&amp;C criteria 2.1</p>	<p>Internal audit has conducted for 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 legal non-compliance 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>

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<p>Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&amp;C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.</p>	<p>Internal audit has been conducted for Bahilang Estate on 08-09 February 2022, Teluk Panji Estate on 18-23 February 2022 and Sentral Estate on 22-27 August 2023. Report of internal audit are available. Result of internal audit:</p> <ul style="list-style-type: none"> <li>- Bahilang Estate, Teluk Panji Estate, Topaz Estate and Sentral Estate has complied to relevant regulation, no issue regarding the legal compliance.</li> <li>- No complaint or grievances and disputes from stakeholders and affected parties.</li> <li>- No labor disputes occur since the latest audit.</li> <li>- No land conflict: Documents related to the history of land tenure and the actual legal or customary use of the land are available.</li> <li>- No new plantings are established on local people's land and no HCV area replacement.</li> </ul>	<p>Complied</p>
<p>Are there any Critical (Major) non-compliance raised against any of the RSPO P&amp;C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?</p>	<p>According to internal audit result, there is no Critical (Major) non-compliance raised against any of the RSPO P&amp;C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates.</p> <p>According to the RSPO RaCP tracker (<a href="https://www.rspo.org/certification/remediation-and-compensation/racp-tracker">https://www.rspo.org/certification/remediation-and-compensation/racp-tracker</a>) update 01 September 2022, PT Inti Indosawit Subur has:</p> <ul style="list-style-type: none"> <li>• MU's with potential liabilities: 4 units</li> <li>• LUCA Submitted (MUs): 4 units</li> <li>• LUCA review completed (MUs): 4 units</li> <li>• Concept Note required (MUs): 3 units</li> <li>• Concept Note submitted (MUs): 2 units</li> <li>• Concept Note approved (MUs): 2</li> <li>• Concept Note submitted (MUs): 2</li> <li>• Concept Note endorsed (MUs): 0</li> <li>• Remediation Plan required (MUs): 4 units</li> <li>• Remediation Plan submitted (MUs): 0</li> <li>• Remediation Plan approved (MUs): 0</li> </ul> <p>Due to the ongoing process of RaCP, the company has revised it TBP and approved by RSPO on 19/04/2023.</p>	<p>Complied</p>
<p>Have there been any stakeholder (including NGO) consultation conducted?</p>	<p>During internal audit (Bahilang Estate on 08-09 February 2022, Teluk Panji Estate on 18-23 February 2022 and Sentral Estate on 22-27 August 2022), stakeholders' consultation already conducted. There is no issue.</p>	<p>Complied</p>

**3.2 Progress of scheme smallholders and/or outgrowers**

<b>Progress of scheme smallholders or outgrowers towards compliance with relevant standards</b>		
<b>Requirement</b>	<b>Remarks</b>	<b>Compliance</b>
<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>



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**Approved Time Bound Plan**

Approved by RSPO on 19/04/2023.

Name of Mill	Mill Address	Name of Supply Bases	Location / 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 Re-certified in 2020-2021
		Buatan (Plasma)	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau		
Buatan II Mill - PT Inti Indosawit Subur	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau	Simpang Perak Estate*	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau	2010	Certified on 16 September 2010 Re-Certified on 16 September 2015 *Split From Buatan Estate Since 1 January 2019 Re-certified in 2020-2021
		Buatan (Plasma)	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau		
Ukui I Mill - PT Inti Indosawit Subur	Ukui Village, Ukui District, Pelalawan Regency, Riau	Ukui Estate	Ukui Village, Ukui District, Pelalawan Regency, Riau	2011	Certified on 1 March 2011 Re-Certified on 1 March 2016 Re-certified in 2021
		Sei Lala Estate*	Ukui Village, Ukui District, Pelalawan Regency, Riau	2011	*Split From Ukui & Soga Estate Since 1 January 2019 Re-certified in 2021
		Ukui (Plasma)	Ukui & Lubuk Batu Jaya District, Pelalawan & Inhu Regency, Riau	2011	Certified on 1 March 2011 Re-Certified on 1 March 2016 Re-certified in 2021
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 Re-certified in 2021

		Ukui (Plasma)	Ukui & Lubuk Batu Jaya District, Pelalawan & Inhu Regency, Riau	2011	Certified on 1 March 2011 Re-Certified on 1 March 2016 Re-certified in 2021
Tungkal Ulu Mill - PT Inti Indosawit Subur	Pulau Pauh / Penyabungan / Merlung Village, Tungkal Ulu District, Tanjung Jabung Regency, Jambi	Tungkal Ulu Estate	Pulau Pauh / Penyabungan / Merlung Village, Tungkal Ulu District, Tanjung Jabung Regency, Jambi	2012	Certified on 15 August 2012 Re-Certification in August 2017 Re-certified in 2022
		Tungkal Ulu (Plasma)	Renah Mendalo, Merlung, Muara Papalik District, Tanjung Jabung Barat Regency,	2012	Certified on 15 August 2012 Re-Certification in August 2017 Re-certified in 2022
Muara Bulian Mill - PT Inti Indosawit Subur	Singoan / Bukit Sari / Bulian Jaya Village, Muara Bulian / Pelayung District, Batang Hari Regency, Jambi	Muara Bulian Estate	Singoan / Bukit Sari / Bulian Jaya Village, Muara Bulian / Pelayung District, Batang Hari Regency,	2013	Certified on 12 July 2013 Re-Certification in August 2017 Re-certified in 2022
		Muara Bulian (Plasma)	Maro Sebo Ilir District, Batanghari Regency, Jambi	2013	Certified on 12 July 2013 Re-Certification in August 2017 Re-certified in 2022
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 Re-certified in 2020
		Topaz Estate (230 Ha)	Petapahan Village, Tapung District, Kampar Regency, Riau	2026	HGU still on process, to propose to Local Government and BPN Pusat
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 Re-certified in 2020
Segati Mill – PT Mitra Unggul Pusaka	Langkan / Penarikan / Tambak / Sotol Village, Langgam	Segati Estate	Langkan / Penarikan / Tambak / Sotol Village, Langgam District, Pelalawan Regency, Riau	2022	Certified on 1 November 2022

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	District, Pelalawan Regency, Riau	Gondai Estate	Pangkalan Sarik / Baru Village, Langgam / Siak Hulu District, Pelalawan / Kampar Regency, Riau	2022	Certified on 1 November 2022
Penarikan Mill – PT Mitra Unggul Pusaka	Penarikan Village, Langgam District, Pelalawan Regency, Riau	Penarikan Estate*	Penarikan / Tambak Village, Langgam District, Pelalawan Regency, Riau	2022	Certified on 1 November 2022
Tanah Datar Mill – PT Supra Matra Abadi	Tanah Datar Petatal Village, Talawi District, Asahan Regency, North Sumatera	Tanah Datar Estate	Tanah Datar Petatal Village, Talawi District, Asahan Regency, North Sumatera	2015	Certified on 18 May 2015 Re-certified in 2020
		Bahilang Estate (1,019 Ha)	Bahilang Village, Tebing Tinggi District, Serdang Bedagai Regency, North Sumatera	2024	*Bahilang Estate on Process RaCP
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 Re-certified in 2020
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 Re-certified in 2020
		Teluk Panjie Estate (801 Ha)		2026	* HGU still on Progress, since the estate under 2 different provinces, the final approval must come from National Authority (BPN Pusat)
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 Re-certified in 2020
		Peranap (Plasma)		2016	Certified on 18 August 2016 Re-certified in 2021
Bungo Tebo Mill – PT Rigunas Agri Utama	Tuo Sumai / Sungai Rambai Village, PWK Sumai / Tebo Ulu District, Bungo	Bungo Tebo Estate	Tuo Sumai / Sungai Rambai Village, PWK Sumai / Tebo Ulu District, Bungo Tebo Regency, Jambi	2015	Certified on 3 December 2015 Re-certified in 2020
		Bungo Tebo (Plasma)		2017	Certified on 7 February 2017

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	Tebo Regency, Jambi				Re-certified in 2022
Tanjung Selamat Mill – PT Indo Sepadan Jaya	Kampung Padang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	Tanjung Selamat	Kampung Padang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	2015	Certified on 26 May 2015 Re-certified in 2020
		Pangkalan	Sennah Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	2015	Certified on 26 May 2015 Re-certified in 2020
Gunung Melayu I – PT Saudara Sejati Luhur	Rahuning Village, Bandar Pulau District, Asahan Regency, North Sumatra	Pulau Maria Estate	Rahuning Village, Bandar Pulau District, Asahan Regency, North Sumatra	2015	Certified on 7 September 2015 Re-certified in 2020
Gunung Melayu II – PT Gunung Melayu	Gonting Malaha Village, Bandar Pulau District, Asahan Regency, North Sumatra	Aek Tarum & Batu Anam Estate	Gonting Malaha Village, Bandar Pulau District, Asahan Regency, North Sumatra	2015	Certified on 8 July 2015 Re-certified in 2020
		Sentral Estate (2,996 Ha)		2024	* Concept Note still on Progress and submit to RaCP team at Q2 2023. Target to conduct audit at Q1 2024
Negri Lama II Mill – PT Hari Sawit Jaya	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	Negri Lama	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	2016	<ul style="list-style-type: none"> <li>• Certified on 23 December 2016 as Independent Mill</li> <li>• Audit in 2016 as Mill and Supply Base</li> <li>• Re-certified in 2021</li> </ul>
		Aek Kuo (2,088 Ha)	Aek Korsik Village, Aek Natas District, Labuhan Batu Regency, North Sumatra	2018	Certified in 2018
		Aek Kuo (501 Ha)		2018	
Negri Lama I Mill – PT Hari Sawit Jaya	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	*3rd party which is excluded from scope of certification	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	2015	<ul style="list-style-type: none"> <li>• Certified on 8 April 2015</li> <li>• Audit in 2016 as Independent Mill</li> <li>• Re-certified in 2020</li> </ul>

**3.3 Details of Nonconformities**

The nonconformities are listed below. The findings summary of the assessment by criteria are listed in Appendix A. During this Assessment there were 2 (two) Major and 1 (one) Minor nonconformity raised. The PT Inti Indosawit Subur – Tungkal Ulu POM Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

Non-conformity																																			
<b>NCR Ref #</b>	2364449-202306-M1	<b>Issued Date</b>	27/06/2023																																
<b>Due Date</b>	26/09/2023	<b>Closure Date</b>	16/08/2023																																
<b>Indicator &amp; Category (Critical / Minor)</b>	2.2.1 - Critical																																		
<b>Statement of Nonconformity:</b>	Based on the document review, it was found that there was non-compliance with regulations related to employment PP No. 35 of 2021 Article 10 paragraph 4 and Article 22.																																		
<b>Requirement Reference:</b>	The unit of certification complies to relevant regulations.																																		
<b>Objective Evidence:</b>	<p>Based on the document review, it is known that there are Mill’s workers (PHL) who work <math>\geq 21</math> consecutive working days in 3 months but are not appointed as PKWTT/Permanent Employees, this is not in accordance with PP 35/2021, as follows:</p> <p>Mill</p> <table border="1"> <thead> <tr> <th>Name</th> <th>January</th> <th>February</th> <th>March</th> </tr> </thead> <tbody> <tr> <td>M. Andre</td> <td>26</td> <td>23</td> <td>26</td> </tr> <tr> <td>Satria Nofrawira</td> <td>24</td> <td>21</td> <td>26</td> </tr> <tr> <td>Reki Oktarina</td> <td>25</td> <td>23</td> <td>25</td> </tr> <tr> <td>Rizky Andrian</td> <td>25</td> <td>23</td> <td>25</td> </tr> </tbody> </table> <p>Office</p> <table border="1"> <thead> <tr> <th>Name</th> <th>March</th> <th>April</th> <th>May</th> </tr> </thead> <tbody> <tr> <td>Tri Nugroho</td> <td>30</td> <td>30</td> <td>30</td> </tr> <tr> <td>Abdul Kodir</td> <td>29</td> <td>25</td> <td>29</td> </tr> </tbody> </table> <p>Furthermore, there are work absences in a month of 30 working days, there is no 1 day of rest for 6 working days as stated in article 22 (PP 35/2021).</p>			Name	January	February	March	M. Andre	26	23	26	Satria Nofrawira	24	21	26	Reki Oktarina	25	23	25	Rizky Andrian	25	23	25	Name	March	April	May	Tri Nugroho	30	30	30	Abdul Kodir	29	25	29
Name	January	February	March																																
M. Andre	26	23	26																																
Satria Nofrawira	24	21	26																																
Reki Oktarina	25	23	25																																
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Name	March	April	May																																
Tri Nugroho	30	30	30																																
Abdul Kodir	29	25	29																																
<b>Corrections:</b>	Propose the appointment of PHL to become SKU employees for the worker.																																		

<p><b>Root Cause Analysis:</b></p>	<p>Lack of unit understanding in detail regarding article 10 paragraph (4) PP No. 35/2021 which states that workers who work more than 21 (twenty one) days for 3 (three) consecutive months must be appointed as permanent employees (PKWTT) and article 22 which states 1 (one) day off for 6 (six) working day greetings 1 (one) week.</p>
<p><b>Corrective Actions:</b></p>	<ol style="list-style-type: none"> <li>1. Make a memorandum to KTU as the PIC whose job is to monitor PHL workers so they don't work more than 21 (twenty-one) days for 3 (three) consecutive months, if indeed on the basis of the company's needs, then the employee must be appointed as SKU employees. Further ensuring that there are no SKU or PHL employees who work a full 30 days in 1 (one) month.</li> <li>2. Conduct socialization from HRD to all units regarding the working day of PHL working in plantations and factories. The socialization will be held in July 2023.</li> </ol>
<p><b>Assessment Conclusion:</b></p>	<p><b>Correction</b></p> <p>There is evidence that the organization has proposed the appointment of daily worker/PHL to become permanent workers/SKU for these workers through the Memorandum of RH Plantation 3, the verified documents as follows:</p> <ul style="list-style-type: none"> <li>- Memorandum No. 195/HR-RO3/MEMO/SK/07/2023 dated 31 July 2023 from RH Plantation 3 to M. Andre (Tungkal Ulu POM) related to "Promotion" from daily worker to permanent worker (SKUH-Pabrik Tungkal Ulu) as Helper of Mechanic/Pembantu Mekanik.</li> <li>- Memorandum No. 196/HR-RO3/MEMO/SK/07/2023 dated 31 July 2023 from RH Plantation 3 to Satria Nofrawira (Tungkal Ulu POM) related to "Promotion" from daily worker to permanent worker (SKUH-Pabrik Tungkal Ulu) as Helper of Mechanic/Pembantu Mekanik.</li> <li>- Memorandum No. 197/HR-RO3/MEMO/SK/07/2023 dated 31 July 2023 from RH Plantation 3 to Reki Oktarina (Tungkal Ulu POM) related to "Promotion" from daily worker to permanent worker (SKUH-Pabrik Tungkal Ulu) as Helper of Mechanic/Pembantu Mekanik.</li> <li>- Memorandum No. 198/HR-RO3/MEMO/SK/07/2023 dated 31 July 2023 from RH Plantation 3 to Rizky Andrian (Tungkal Ulu POM) related to "Promotion" from daily worker to permanent worker (SKUH-Pabrik Tungkal Ulu) as Helper of Mechanic/Pembantu Mekanik.</li> </ul> <p>For Tri Nugroho and Abdul Kodir, PT IIS Tungkal Ulu has requested approval for the appointment of the management (RO3 Office) regarding the 2 people, and the RO3 Office has agreed, and this was then conveyed to the employees. The employees stated that in August they planned not to work anymore because they would be taking care of their own garden and will move domicile (back home), this was in accordance with the Resignation Letter on behalf of Tri Nugroho and Abdul Kodir as of 1 August 2023 signed by them and stamped.</p> <p><b>Corrective action</b></p> <p>There is evidence related to the Memorandum from Senior Manager to all Head of Administration/KTU (Kepala Tata Usaha) as per Memorandum No. 12/SM-KTU/VII/2023 dated 1 July 2023 related to "PIC for Monitoring of Employee Working Day and Working Hours/ Penanggungjawab Monitoring HK dan Waktu Kerja Karyawan", memorandum refers to regulation PP No.35/2021.</p>

	<p>There is evidence that HR Plantation 3 has carried out training "Refresh Training" on 3 August 2023, the training has been attended by 9 persons namely KTU Tungkal Ulu Estate, KTU Scheme Smallholders and KTU Tungkal Ulu POM.</p> <p>During NCR Close Out Visit also has been carried out interview to the KTU/Head of Administration – Tungkal Ulu Estate and Tungkal Ulu POM, it was known that the KTUs has understood the Memorandum No. 12/SM-KTU/VII/2023 dated 1 July 2023, and also PP 35/2021.</p> <p>Based on CAP's verification results, it was concluded that findings 2364449-202306-M1 can be closed.</p>
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Non-conformity			
<b>NCR Ref #</b>	2364449-202306-M2	<b>Issued Date</b>	27/06/2023
<b>Due Date</b>	26/09/2023	<b>Closure Date</b>	16/08/2023
<b>Indicator &amp; Category (Critical / Minor)</b>	3.6.1 - Critical		
<b>Statement of Nonconformity:</b>	Risk controls that have been determined against identified risks are not properly implemented.		
<b>Requirement Reference:</b>	All operational activities risks assessed to identify the H&S issues. Mitigation plans and procedures are documented and implemented.		
<b>Objective Evidence:</b>	<p>The implementation of risk control for harvesting work on electricity lines was not carried out properly resulting in work accidents for harvest workers being electrocuted.</p> <p>Some objective evidence in the field:</p> <ul style="list-style-type: none"> <li>• 1 (one) harvest worker was electrocuted while harvesting on afdeling 6 high trees in May 2023.</li> <li>• The company has set HIRAC updated February 2023 regarding harvesting work in the high voltage power line area.</li> <li>• No signs of high voltage hazard were found in the PLN power line area as stipulated in risk control in the HIRAC document updated February 2023.</li> <li>• At the time of the harvester being electrocuted, the PLN electricity line was not turned off as stated in the February 2023 HIRAC update compiled by the company.</li> <li>• Harvesting tools used by harvesters do not meet electrical insulator standards.</li> <li>• There is no special training related to harvesting in the electricity line area for harvesters who harvest in the PLN electricity line area.</li> </ul>		
<b>Corrections:</b>	AK3U conducted socialization of the Risk Analysis (HIRAC) harvesting work on the electricity line that had been made to the Tungkal Ulu Estate team.		
<b>Root Cause Analysis:</b>	The AK3U has not socialized the Risk Analysis (HIRAC) harvesting work on the electricity line to the Tungkal Ulu Estate so that the established risk controls are not implemented as they should.		



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<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1. AK3U re-evaluates the control of the risk of turning off the PLN electricity line during harvesting activities on the electricity line in the HIRAC document because this is very difficult to do.</li> <li>2. Implement all risk controls that have been determined in the field for harvesting work on electric lines, namely:             <ol style="list-style-type: none"> <li>a. Installing high voltage hazard signs in the electric line area.</li> <li>b. Appoint three special harvesters who are only allowed to harvest in the electricity line area.</li> <li>c. Equipping PPE leather gloves, helmets and AP shoes to special harvesters on power lines.</li> <li>d. Using a special type of yellow palmpro when harvesting in the area of electricity lines.</li> <li>e. Provide training on a regular basis (min 6 months) to special harvesters on electricity lines conducted by AK3U Plantation.</li> <li>f. Make Work Instructions (WI) for safe distances for harvesting activities and oil palm shoots that are near power lines.</li> <li>g. Make Work Instructions (WI) for a safe distance to plant oil palm near electricity lines in areas that have been replanted.</li> </ol> </li> </ol>
<b>Assessment Conclusion:</b>	<p><b>Correction</b></p> <p>There is evidence that AK3U has socialized the Risk Analysis (HIRAC) harvesting work on the electricity line that has been made to the team of Tungkal Ulu Estate on 11 August 2023 that attended by 20 persons (Senior Manager, Askep, Assistant, Supervisor, KTU). Attendance list and photo documentation has shown during NCR Close Out Visit.</p> <p><b>Corrective action</b></p> <p>There is evidence available that AK3U re-evaluated the control of the risk of turning off the PLN electricity line during harvesting activities on the electricity line in the HIRAC document because this is very difficult to do. The HIRAC document update in July 2023 has shown during NCR Close Out Visit.</p> <p>There is evidence that the organization has installing High Voltage Hazard Signs in the electric line area, especially in Afdeling 1, 5 and 6. The evidence has shown during NCR Close Out Visit.</p> <p>There is evidence that organization has appoint 3 (three) special harvesters who are only allowed to harvest in the electric line area, the evidence as per Memorandum from Senior Manager No. 081/SM-KTU/MEMO/VI/2023 dated 22 June 2023 From Senior Manager to Assistant Afd VI related to Appoint of the Special Harvesters in Electric Line Area. The harvesters that have been appointed namely Iwan Gunawan (ID 00316), Zakaria Sembiring (ID 01312) and Jonedi Fransisko Saragih (ID 03890). PPE that must be carried when working, namely Gloves, Safety helmet, Rubber Shoes, and Special Palmpro/Special harvesting pole "Palm Pro E Yellow". As per specification of Palm Pro E Yellow that it can withstand electricity up to 100 KV.</p> <p>There is evidence that organization have equipped PPE leather gloves, helmets and AP shoes and palm pro to special harvesters on power lines, the evidence has shown during NCR Close Out Visit</p>



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	<p>There is evidence that organization has carries out refresh training related to the Safety Awareness for harvesters who are works at electric line area. The training has carried out on 23 June 2023.</p> <p>There is evidence that organization has made Work Instructions (WI) for a safe distance to plant oil palm near electricity lines in areas that have been replanted.</p> <p>During field visit at Block E20b Afdeling 6 it was known that the area is being replanted. Based on interview to the Assistant it was known that planting oil palm will refers to the WI issues by SM. It should be noted that the harvest areas where the electric lines pass are only in a few blocks in the afdeling 1,5 and 6. In afdeling-1 is a low staple crop in OP 2016 and for Afdeling 5 -6 during NCR Close Out Visit the area is being replanted. so that there are no more tall staple crops in Tungkal Ulu Estate.</p> <p>Interview to the special harvesters (3 persons) on behalf Iwan Gunawan, Zakaria Sembiring and Jonedi Fransisko Saragih during NCR Close Out Visit it was known that they have understood regarding the SM Memorandum regarding the harvesting activity at electric line area.</p> <p>Based on CAP's verification results, it was concluded that findings 2364449-202306-M2 can be closed.</p>
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Non-conformity			
<b>NCR Ref #</b>	2364449-202306-N1	<b>Issued Date</b>	27/06/2023
<b>Due Date</b>	ASA 2-2	<b>Closure Date</b>	ASA 2-2
<b>Indicator &amp; Category (Critical / Minor)</b>	3.3.2 – Minor		
<b>Statement of Nonconformity:</b>	Mechanisms for checking the implementation of best management practices procedure is inconsistent.		
<b>Requirement Reference:</b>	A mechanism to check consistent implementation of procedures is in place.		
<b>Objective Evidence:</b>	<p>Implementation of best management practice procedure that have been set by the company is not consistently implemented in plasma plantations.</p> <p>Some field audit evidence as follows:</p> <ul style="list-style-type: none"> <li>• Found 6 farmer plots in KUD Karya Jaya whose conditions were not maintained (uncontrolled weeds, no pruning). Furthermore, there is replanting which is done by underplanting.</li> <li>• Found plots of sample farmers in KUD Karya Kita that were intercropped with other crops (food crops such as cassava and chilies).</li> <li>• It was found that the condition of farmer plots in the KUD Karya Kita sample was uncontrolled and there were lots of forest banana weeds.</li> <li>• Found the condition of the sample plots of farmers in KUD Sari Bumi which was totally sprayed (Plots an. Sungkono), and KUD Sawit Mulia an. Supardi.</li> </ul>		
<b>Corrections:</b>	1. Smallholder members who carry out underplanting activities make a statement that they are willing and will participate in all coaching activities and follow the		

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	<p>SOP owned by the company, in this case the Management Plasma Tungkal Ulu Plasma.</p> <ol style="list-style-type: none"> <li>2. Give letters of warning to smallholder member who are still carrying out intercropping activities in farmer plots.</li> <li>3. The Management Plasma Team provides assistance and direct control to control forest plantain weeds in farmer plots.</li> <li>4. Make a letter of cooperation between KUD and the company for the use of the company's TUS Team in carrying out all weed control activities or spraying on farmer plots. The letter of cooperation also includes details of the costs to be incurred and the rotation of controls to be carried out.</li> </ol>
<b>Root Cause Analysis:</b>	<ol style="list-style-type: none"> <li>1. Smallholder member do not yet know the negative impact of underplanting on the long-term production of newly planted young oil palms.</li> <li>2. Smallholder members do not know the negative impact on oil palm plantations as a result of intercropping with other crops.</li> <li>3. Lack of understanding of smallholder member regarding proper control to deal with forest plantain weeds in the field.</li> <li>4. Smallholder member still carry out weed control or spraying independently and do not have a measurable system/recording.</li> </ol>
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1. The Management Plasma - Tungkal Ulu conducts socialization to smallholder member, especially smallholder member who carry out underplanting activities about the adverse effects of underplanting activities on the long-term production of young oil palm plants that have just been planted.</li> <li>2. The Management Plasma - Tungkal Ulu conducts training and socialization to smallholder member, especially smallholder member who still apply the intercropping pattern about the negative impacts of these activities on oil palm cultivation.</li> <li>3. The Management Plasma - Tungkal Ulu conducted training on how to control forest plantain weeds with appropriate and effective techniques.</li> <li>4. Centralize all weed control activities or spraying using the company's TUS Team.</li> </ol>
<b>Assessment Conclusion:</b>	Will be verified in the next assessment.

Opportunity for Improvements	
OFI #	Description
OFI 1	Nil

Positive Findings	
PF #	Description
PF 1	Nil

**3.3.1 Status of Nonconformities Previously Identified and Observations**

<b>Non-conformity</b>			
<b>NCR Ref #</b>	2235764-202208-N1	<b>Issued Date</b>	08/08/2022
<b>Due Date</b>	ASA 2-1	<b>Closure Date</b>	27/06/2023
<b>Indicator &amp; Category (Critical / Minor)</b>	Indicator 2.1.3 (Minor)		
<b>Statement of Nonconformity:</b>	Legal boundaries are not clearly demarcated and maintained.		
<b>Requirement Reference:</b>	Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.		
<b>Objective Evidence:</b>	<p>Based on field visit to sample legal boundary pegs selected in Tungkal Ulu Estate, two pegs is not found and the remain pegs is not maintained:</p> <ul style="list-style-type: none"> <li>• ID HGU Pole No. BPN/IIS No.48, location Block D09a, adjacent border with independent smallholder of Merlung village, condition was not maintained and no number mark.</li> <li>• ID HGU Pole No. BPN/IIS No.49 and BPN/IIS No.51, location not found and lost.</li> <li>• ID HGU Pole No. BPN/IIS No.52, location Block E18a, adjacent border with independent smallholder named Mr. Alex, condition was not maintained, no number mark, almost collapse.</li> </ul>		
<b>Corrections:</b>	<ul style="list-style-type: none"> <li>- Conduct inventory or census all HGU poles condition.</li> <li>- Immediately install the new HGU poles for missing HGU poles</li> <li>- Repainted and marking the HGU poles and clearing HGU stakes covered by bushes</li> </ul>		
<b>Root Cause Analysis:</b>	PIC (Humas) does not verify in the field to ensure the condition of the stakes that have been treated/monitored by officers in the field are in good condition and well maintained.		
<b>Corrective Actions:</b>	PIC (Humas) conducted field visits each semester to verify HGU poles maintenance work that had been carried out by officers and record the activity in "Laporan Perawatan Patok HGU".		
<b>Assessment Conclusion:</b>	Audit team has reviewed the root cause analysis and accepted the CAP. Audit team went onsite and verified field condition as part of correction. Audit team verified monitoring plan, monitoring record. Audit team deemed the correction and corrective action is effective to close out Non-Critical/Minor NC.		

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Non-conformity			
<b>NCR Ref #</b>	2235764-202208-N2	<b>Issued Date</b>	08/08/2022
<b>Due Date</b>	ASA 2-1	<b>Closure Date</b>	27/06/2023
<b>Indicator &amp; Category (Critical / Minor)</b>	Indicator 2.2.2 (Minor)		
<b>Statement of Nonconformity:</b>	Specific clauses on meeting applicable legal requirements are not covered/describes in the contracts.		
<b>Requirement Reference:</b>	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.		
<b>Objective Evidence:</b>	<p>Sample contract on FFB transport at Scheme Smallholders:</p> <ul style="list-style-type: none"> <li>- KUD Sawit Kita: "Surat Perjanjian Kerja Angkutan No: 001/KUD-SK/I/2022" dated 17 January 2022. Agreement between: GODI (FFB transporter) and KUD Sawit Kita.</li> <li>- KUD Panca Mukti: "Surat Perjanjian Kerja Angkutan No: 003/KUD-PM/I/2022" dated 20 January 2022. Agreement between: JAMUSRIDAL (FFB transporter) and KUD Panca Mukti.</li> </ul>		
<b>Corrections:</b>	Adding a clause regarding compliance with laws and regulations that apply to all Work Agreement Letters that exist in any work carried out by third parties with KUD (cooperatives).		
<b>Root Cause Analysis:</b>	Lack of understanding by the KUD management regarding the standard of contract agreement with third parties according to RSPO requirement.		
<b>Corrective Actions:</b>	Conduct training or socialization to all KUD management on how to make the standard of contract agreement with third parties according to RSPO requirement and show examples of contract agreement owned by the company so that they can be used as a reference.		
<b>Assessment Conclusion:</b>	Audit team has reviewed the root cause analysis and accepted the CAP. Audit team went onsite and verified field condition as part of correction. Audit team verified monitoring plan, monitoring record. Audit team deemed the correction and corrective action is effective to close out Non-Critical/Minor NC.		

Non-conformity			
<b>NCR Ref #</b>	2235764-202208-N3	<b>Issued Date</b>	08/08/2022
<b>Due Date</b>	ASA 2-1	<b>Closure Date</b>	27/06/2023
<b>Indicator &amp; Category (Critical / Minor)</b>	Indicator 2.2.3 (Minor)		
<b>Statement of Nonconformity:</b>	Clauses disallowing child, forced and trafficked labour are not covered/describes in the contracts.		
<b>Requirement Reference:</b>	All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.		

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<b>Objective Evidence:</b>	Sample contract on FFB transport at Scheme Smallholders: <ul style="list-style-type: none"> <li>- KUD Sawit Kita: "Surat Perjanjian Kerja Angkutan No: 001/KUD-SK/I/2022" dated 17 January 2022. Agreement between: GODI (FFB transporter) and KUD Sawit Kita.</li> <li>- KUD Panca Mukti: "Surat Perjanjian Kerja Angkutan No: 003/KUD-PM/I/2022" dated 20 January 2022. Agreement between: JAMUSRIDAL (FFB transporter) and KUD Panca Mukti.</li> </ul>
<b>Corrections:</b>	Adding a clause regarding the prohibition of underage child labor, forced labor, and human trafficking to all work agreements that exist for any work carried out by third parties with KUD (cooperative).
<b>Root Cause Analysis:</b>	Lack of understanding by the KUD management regarding the standard of contract agreement with third parties according to RSPO requirement.
<b>Corrective Actions:</b>	Conduct training or socialization to all KUD management on how to make the standard of contract agreement with third parties according to RSPO requirement and show examples of contract agreement owned by the company so that they can be used as a reference.
<b>Assessment Conclusion:</b>	Audit team has reviewed the root cause analysis and accepted the CAP. Audit team went onsite and verified field condition as part of correction. Audit team verified monitoring plan, monitoring record. Audit team deemed the correction and corrective action is effective to close out Non-Critical/Minor NC.

Non-conformity			
<b>NCR Ref #</b>	2235764-202208-N4	<b>Issued Date</b>	08/08/2022
<b>Due Date</b>	ASA 2-1	<b>Closure Date</b>	27/06/2023
<b>Indicator &amp; Category (Critical / Minor)</b>	Indicator 7.2.5 (Minor)		
<b>Statement of Nonconformity:</b>	During field visit to smallholder plots, it was found that paraquat are used by some of smallholder members.		
<b>Requirement Reference:</b>	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 used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.		
<b>Objective Evidence:</b>	Based on field visit to smallholder member plots and interview in plots 240 Kelompok Tani 4, kelompok Tani 7, and Kelompok Tani 12 at KUD Sawit Kita revealed that the smallholder members are use paraquat for weeds control.		
<b>Corrections:</b>	Make warning letters to farmers who are still controlling weeds using the active ingredient paraquat and other class 1A or 1B pesticides.		
<b>Root Cause Analysis:</b>	Lack of monitoring by foremen to plasma farmers so that farmers spray themselves in the field using the active ingredient paraquat.		
<b>Corrective Actions:</b>	Conduct socialization to all farmers member about the dangers of using the active ingredient paraquat and entrust all weed control activities (spraying) to the TUS		

	team (Spray Unit Team) which has been provided by the company as well as giving strict sanctions to farmer members who are still spraying using the active ingredient paraquat.
<b>Assessment Conclusion:</b>	Audit team has reviewed the root cause analysis and accepted the CAP. Audit team went onsite and verified field condition as part of correction. Audit team verified monitoring plan, monitoring record. Audit team deemed the correction and corrective action is effective to close out Non-Critical/Minor NC.

### 3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
Previous assessment (ASA 1.3 & ASA 1.4)				
1932214-202007-M1	Critical	3.8.6	08/07/2020	Closed 7 Sept 2020
1932214-202007-M2	Critical	4.1.1	08/07/2020	Closed 7 Sept 2020
1932214-202007-M3	Critical	6.6.2	08/07/2020	Closed 7 Sept 2020
2107728-202109-M1	Critical	6.7.3	18/22/2021	Closed 29 Nov 2021
Recertification Assessment (RC 2)				
2235764-202208-N1	Minor	2.1.3	08/08/2022	Closed 23/06/2023
2235764-202208-N2	Minor	2.2.2	08/08/2022	Closed 23/06/2023
2235764-202208-N3	Minor	2.2.3	08/08/2022	Closed 23/06/2023
2235764-202208-N4	Minor	7.2.5	08/08/2022	Closed 23/06/2023
ASA2.1				
2364449-202306-M1	Critical	2.2.1	27/06/2023	Closed 16/08/2023
2364449-202306-M2	Critical	3.6.1	27/06/2023	Closed 16/08/2023
2364449-202306-N1	Minor	3.3.2	27/06/2023	Next Assessment

### 3.4 Stakeholders and previous landowner / user consultation

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

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

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

<b>Stakeholders contacted</b>		
<b>Type of Stakeholder</b> (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	<b>Stakeholder name / organization</b>	<b>Means of communication</b> (e.g. face to face interview, email, phone interview, comment from public notice)
Governmental	Dinas Lingkungan Hidup Kabupaten Tanjung Jabung Barat – Environmental Agency (Mr Reza)	Phone interview
Governmental	Dinas Tenaga Kerja dan Transmigrasi Kabupaten Tanjung Jabung Barat – Manpower Agency (Mrs Heni)	Phone interview
Governmental	Dinas Perkebunan Kabupaten Tanjung Jabung Barat - Plantation Agency (Mr Zulkapli)	Phone interview
Governmental	Badan Kesatuan Bangsa dan Politik (Kesbangpol) Kabupaten Tanjung Jabung Barat - National and Political Unity Agency (Mr Taufik)	Phone interview
Union	Worker union/KSBSI: Mr Sitorus (Vice Chairman)	Face to face interview
Internal	Gender Committee: Mr Marianis (Head of Gender Committee of Tungkal Ulu Estate & Mill)	Face to face interview
Communities	Head of Penyabung Village (Mr. M Sadat)	Face to face interview
Communities	Head of Lubuk Terap Village (Mr M Zakhri)	Face to face interview
NGO	Yayasan Setara Jambi (Mr Ridho)	Phone interview

<b>Stakeholders comment</b>	
<b>1.</b>	<p><b>Feedbacks:</b>  <b>Department of Plantation Tanjung Jabung Barat Regency</b>  <b>Mr Zulkapli</b></p> <ul style="list-style-type: none"> <li>There were no significant problems received by the Plantation Service regarding the operations of PT IIS Tungkal Ulu.</li> </ul>

	<ul style="list-style-type: none"> <li>The company has submitted complete reports regarding plantation operations, including reports on palm oil production and processing in accordance with the permitted capacity of 60 tonnes of FFB per hour.</li> <li>The company has a PIR-TRANS scheme plasma program, including for local communities.</li> <li>Several oil palm plants have been replanted since 2020. Plans for the replanting program including the Plasma replanting plan have been reported to the Tanjung Jabung Barat Regency Plantation Service.</li> <li>It was recorded that there was a dispute problem with the Tanjung Paku Village community which is currently ongoing and mediated by the regional government through KESBANGPOL (National and Political Unity Agency). It was recorded that there was a problem with the Tanjung Paku Village community which is currently ongoing and mediated by the regional government through KESBANGPOL (National and Political Unity Agency).</li> </ul>
	<p><b>Audit Team verification and response:</b>          Related to the replanting program:          Tungkal Ulu Estate:          According to the long-term management plan period 2020 – 2024, certificate holders have had annual replanting program as follows:</p> <ul style="list-style-type: none"> <li>2020: 567 Ha</li> <li>2021: 552 Ha</li> <li>2022: 667 Ha</li> <li>2023: 630 Ha</li> <li>2024: 252 Ha</li> </ul> <p>Scheme Smallholder:          According to the smallholder projection 2020 – 2025 obtained the replanting estimation as follows:</p> <ul style="list-style-type: none"> <li>2020: 567 Ha</li> <li>2021: 552 Ha</li> <li>2022: 667 Ha</li> <li>2023: 630 Ha</li> <li>2024: 252 Ha</li> </ul> <p>During audit, obtained information that replanting activity has been conducted since 2020 until present. There was no fire usage during that process.</p>
<p><b>2.</b></p>	<p><b>Feedbacks:</b>  <b>Department of Manpower of Tanjung Jabung Barat Regency:</b>  <b>Mrs Heni</b></p> <ul style="list-style-type: none"> <li>Employment legal requirements have been met properly, including licensing and reporting obligations.</li> <li>All employees have been included in the BPJS (Employment and Health) program.</li> <li>In the 2022-2023 period there are no records of Industrial Relations cases.</li> <li>The company has a collective work agreement - PKB for the period 2023-2025 and has been registered with the Tanjung Jabung Barat Regency Manpower Office.</li> <li>Labor law requirements have been properly fulfilled, including licensing and reporting obligations.</li> <li>All workers have been included in the BPJS (Employment and Health) program.</li> </ul>



	<ul style="list-style-type: none"> <li>Companies are asked to prioritize internal settlements between the company and its employees.</li> </ul> <p><b>Audit Team verification and response:</b>  The company received comments from the Department of Manpower as a positive response.  The company will always maintain relationships and communication.  The company has taken action in accordance with well-established procedures and persuasive approach, so there is no issue.</p>
<p><b>3.</b></p>	<p><b>Feedbacks:</b>  <b>Environmental Office of Tanjung Jabung Barat Regency</b>  <b>Mr Reza</b></p> <ul style="list-style-type: none"> <li>The company has sent reports related to environmental management (RKL-RPL, Hazardous Waste Report, Liquid Waste Report) periodically.</li> <li>In the 2022-2023 period, there were no complaints of environmental pollution from local communities, NGOs or other parties.</li> <li>Environmental management at the PT IIS - Tungkal Ulu Plantation has been carried out quite well.</li> <li>Liquid waste application permits are in place, liquid waste management/application reports are reported regularly.</li> <li>Environmental measurements have been carried out and reported regularly by PT IIS - Tungkal Ulu through the RKL-RPL Environmental Management Report in 6 months bases.</li> </ul> <p><b>Audit Team verification and response:</b></p> <ul style="list-style-type: none"> <li>Company acknowledges the comment from Plantation Agency as positive responses.</li> <li>The company will always foster relationships and communication.</li> <li>The mandatory semester and 3-month reporting (RKL RPL) has been carried out in accordance with applicable regulations.</li> <li>Consultations related to environmental management are always carried out.</li> <li>As a positive response from Environment Office, environmental management has been carried out well. The auditor will always verify in the field related to environmental management that has been carried out by the company.</li> </ul>
<p><b>4.</b></p>	<p><b>Feedbacks:</b>  <b>Badan Kesatuan Bangsa dan Politik Kabupaten Tanjung Jabung Barat - National and Political Unity Agency</b>  <b>Mr Taufik</b></p> <p>There was conflict between the people of Tanjung Paku Village and PT IIS Tungkal Ulu, the conflict since the beginning of the plantation development where the last complaint made by the Tanjung Paku community occurred on 23 June 2021 by occupying land in Block E93D and E93C.</p> <p><b>Audit Team verification and response:</b></p> <p>The previous case was related to a land dispute with the people of Tanjung Paku Village covering an area of around 107 hectares. Until this audit was carried out, land disputes had been handled by the regional government, namely KESBANGPOL as a mediator in resolving them.</p> <p>Where the KESBANGPOL Agency is an element implementing supporting functions for government affairs in the fields of national unity and politics. The KESBANGPOL Agency is led by a Head of the Agency whose position is subordinate to and responsible to the Governor of Jambi through the Regional Secretary.</p> <p>Based on an interview with Mr. Taufik (Jambi Province KESBANGPOL Staff), up to now the issue has not yet reached an agreement, even though the company PT IIS – Tungkal Ulu has responded positively with</p>

	<p>mediation through KESBANGPOL. The last thing KESBANGPOL did was on 2 August 2022 to write a letter to the Head of Merlung Subdistrict with a copy to BPN Tanjung Jabung Barat Regency to conduct a field inspection, but up to now there has been no response from the Head of Merlung Subdistrict.</p> <p>Procedurally, PT IIS - Tungkal Ulu has carried out actions and treatments in accordance with established procedures, namely Standard Operating Procedures (SOP). No. AA-GL-5003.1-R2 concerning Handling Land Conflicts and also related regulations.</p> <p>PT IIS – Tungkal Ulu will respect and follow the conflict resolution process in accordance with applicable regulations and established procedures.</p>
<p><b>4.</b></p>	<p><b>Feedbacks:</b>  <b>Head of Penyabung Village</b>  <i>Mr M. Sadat</i>  <b>Head of Lubuk Terap Village</b>  <i>Mr M. Zakhri</i></p> <ul style="list-style-type: none"> <li>• There is no land dispute issue.</li> <li>• There is a PIR-Trans program located in SP 3 (<i>Satuan Pemukiman</i>) and SP 8 (<i>Satuan Pemukiman</i>).</li> <li>• Communication with the company went well including social assistance.</li> </ul> <p><b>Audit Team verification and response:</b>  The company has managed good relationship with local communities. There is no issues on land dispute, environmental or social conflict with people of Pulau Pauh Village.  There is no further comment, and this is a positive comment for the company.</p>
<p><b>5.</b></p>	<p><b>Feedbacks:</b>  <b>Vice Chairman of Worker Union "HUKATAN KSBSI - Konfederasi Serikat Buruh Seluruh Indonesia"</b>  <b>Mr Sitorus</b></p> <ul style="list-style-type: none"> <li>• The company has realized employee normative rights such as remuneration in accordance with applicable regulations, allowances/THR and BPJS Program.</li> <li>• Communication has gone well with the company.</li> <li>• Legally union member is a labor consist of Permanent Workers (SKU-H &amp; SKU-B), however operationally union also consider the problems that occur at the level of daily workers.</li> <li>• Daily workers have had a Work Agreement (SPK) with the company.</li> <li>• There is no indication that organisation conducted discrimination against to the workers.</li> <li>• Organisation has provided PPE for all workers.</li> <li>• The company has provided the workers amenities, such as; housing, clean water, electricity, toilets, sanitation, clinics, day care, place of worship, etc.</li> <li>• The company has registered all workers in BPJS program (Accident and Health Insurance) including daily workers.</li> <li>• The company has provided wages in accordance with the regulations.</li> <li>• There is no indication of the company has violated of Human Rights.</li> <li>• There is no indication of forced labor or coercive labor practice of work.</li> </ul> <p><b>Audit Team verification and response:</b>  The company has maintained good management of occupational and social policy, all feedback from workers union is positive as well as previous assessment.</p>

<p><b>6.</b></p>	<p><b>Feedbacks:</b>  <b>Yayasan Setara Jambi</b>  <i>Mr. Ridho</i></p> <ul style="list-style-type: none"> <li>• The plasma around PT IIS Tungkal Ulu is a PIR-Trans program including Tanjung Paku Village. At that time WALHI Jambi also became a facilitator in the PIR-Trans program but Tanjung Paku Village withdrew as a village facilitated by WALHI Jambi.</li> <li>• The people of Tanjung Paku during the 2020-2021 period have submitted requests for facilitation 3 times for the claimed land covering an area of 107 Ha which is calculated from 0.8 Ha x the number of CPCL at the beginning of 129 participants.</li> <li>• The community has already received profit sharing in 2000 but has stopped until now.</li> <li>• The disputed land has become the HGU of PT IIS Tungkal Ulu.</li> <li>• The people of Tanjung Paku Village have asked for facilitation from the Tanjung Jabung Barat Regency Integrated Team until they take action on land occupation on 23 – 24 June 2021.</li> <li>• Until now, the land area of 107 Ha is still managed by PT IIS Tungkal Ulu.</li> </ul> <p><b>Audit Team verification and response:</b>          Since the previous audit, there have been no complaints from the public or other stakeholders. However, the previous case was related to a land dispute with the people of Tanjung Paku Village covering an area of around 107 hectares. Until this audit was carried out, land disputes had been handled by the regional government, namely KESBANGPOL as a mediator in resolving them.          Where the KESBANGPOL Agency is an element implementing supporting functions for government affairs in the fields of national unity and politics. The KESBANGPOL Agency is led by a Head of the Agency whose position is subordinate to and responsible to the Governor of Jambi through the Regional Secretary.          Based on an interview with Mr. Taufik (Jambi Province KESBANGPOL Staff), up to now the issue has not yet reached an agreement, even though the company PT IIS – Tungkal Ulu has responded positively with mediation through KESBANGPOL. The last thing KESBANGPOL did was on 2 August 2022 to write a letter to the Head of Merlung Subdistrict with a copy to BPN Tanjung Jabung Barat Regency to conduct a field inspection, but up to now there has been no response from the Head of Merlung Subdistrict.</p>
<p><b>7.</b></p>	<p><b>Feedbacks:</b>  <b>Mrs Marianis – Committee Gender</b></p> <ul style="list-style-type: none"> <li>• There is no sexual harassment report during period 2022 and 2023.</li> <li>• The company has given time for new mothers to breastfeed their babies.</li> <li>• There is no issue regarding the gender, discrimination and/or sexual harassment in period 2020 - 2022 at Mill and Estates.</li> <li>• Gender Committee has understood regarding the grievance mechanism as well as the protection of the identity of the complainants/whistle-blower.</li> <li>• The company has implemented the sexual harassment policy.</li> <li>• Unit of Certification has provided pregnancy test to spraying workers and fertilization workers every month.</li> </ul> <p><b>Audit Team verification and response:</b>          The company has maintained good management of occupational and social policy, all feedback from workers union is positive as well as previous assessment, audit team acknowledge the positive feedback. Plantation management notes that spraying is not carried out by pregnant or breastfeeding women. Female workers voluntarily carry out their own menstrual cycle tests and notify the Polyclinic for review by nurses and recording every month. Pregnancy checks were carried out based on the Minutes of PT IIS- Tungkal</p>

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	Ulu Estate Pregnancy Tests on 15 May 2023 on 13 female workers from 7 foremen or 66 female workers, while the results of the checks were that all of these workers were declared negative.
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List of landowner / 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	Nil	Nil	Nil	Nil	Nil
PT Inti Indosawit Subur – Tungkal Ulu POM was established since 1990 and has planting palm oil since 1990 and 1991. Currently the palm oil has been replanting since 2015.					

Previous landowner / user comment	
	<b>Feedbacks:</b> Nil
	<b>Audit Team verification and response:</b> Nil

**3.5 Impartiality and conflict of interest**

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

**Formal Signing-off of Assessment Conclusion and Recommendation**

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

Report prepared by	Acceptance of Assessment Conclusion
<b>Name: Nanang Rusmana</b>	<b>Name: Putu Grhyate Yonata Aksa</b>
<b>Company Name: PT BSI Group Indonesia</b>	<b>Company Name: PT Inti Indosawit Subur – Tungkal Ulu POM</b>
<b>Title: Client Manager</b>	<b>Title: Sustainability Operation</b>
<b>Signature:</b>  	<b>Signature:</b> <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>  
<b>Date: 19 August 2023</b>	<b>Date: 20 August 2023</b>

**Appendix A: Summary of Findings**

Criterion / Indicator	Assessment Findings	Compliance
<p><b>Principle 1: Behave ethically and transparently</b>            Drive ethical business behaviour, build trust and transparency with stakeholders to ensure strong and healthy relationships.</p>		
<p><b>Criteria 1.1:</b> 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><b>(C)</b> Management documents that are specified in the RSPO P&amp;C are made publicly available.            - Critical (Major) compliance -</p>	<p>The list of documents that can be accessed by the public, has not changed, namely: <i>Daftar Dokumen dan Indormasi Untuk diakses Publik PT Inti Indosawit Subur – Tungkal Ulu Group</i> dated 1 April 2023. There are 34 documents and data that can be accessed by the public or stakeholders which include: Environmental documents (EIA, Monitoring &amp; Management Plan, Environmental Report, HCV Report, Land Use Right Permits.</p> <p>Based on interviews with several stakeholders during this audit, they stated that there were no difficulties in obtaining data and documents in accordance with the procedures that the company had set.</p> <p>Any stakeholders request for accessing documents that are made publicly available is already regulated in the company management system through procedure No. AA-GL-5008.1- R1, dated 22 August 2011 regarding Request Information of Stakeholders or “Prosedur Penangan Permintaan Informasi Stakeholder”. This procedure has been disseminated to stakeholders on October 13, 2022.</p> <p>During the audit, document verification is carried out, that the company has prepared duplicate documents that stakeholders will access.</p> <p><b>Scheme smallholders:</b></p> <p>Tungkal Ulu Plasma Plantation has established a list of documents that can be accessed by the public set by each KUD. This list of documents does not contain any changes from the previous year. In this surveillance</p>

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		audit, samples were taken, namely: List of Documents and Information for Public Access KUD Sawit Mulya, KUD Karya Kita. KUD Karya Jaya and KUD Sari Bumi in March 2023, the documents included are Copy of landownership (SHM), Smallholders Plantation Registration (STD-B), Environmental Commitment (SPPL), Cooperative Legal Document, Cooperative Policies, Procedures and Flowchart, Cooperative Report, Management and Annual Report (Rapat Anggota Tahunan).	
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders. - Minor compliance -	<p>Based on document verification that <i>Daftar Dokumen dan Informasi Untuk diakses Publik PT Inti Indosawit Subur – Tungkal Ulu Group</i> dated 1 April 2023. The provision of publicly available document segregates based on stakeholder category. PT Inti Indosawit Subur – both of Tungkal Ulu POM and Estate also smallholder has provided information in appropriate languages (Bahasa Indonesia) which can be understood and accessible by relevant stakeholders including for Smallholder documents.</p> <p>Based on interview with surroundings stakeholder (e.g. Head of village Intan Village, Bukit Harapan Village, contractor of Transport FFB that they understood of the list.</p> <p><b>Scheme smallholder:</b> The Smallholder Manager has determined type of documents which can be accessed by public as "<i>Daftar Dokumen yang Dapat Di Akses (tahun 2022</i>" updated on 12 January 2023, as mentioned in 1.1.1. All the document provided in appropriate languages and accessible to relevant stakeholders. During interview with sample of smallholder member, they understand with the information of Publicly Document. Cooperative sample; KUD Karya Kita, KUD Karya Jaya, KUD Sari Bumi, KUD Sawit Mulia.</p>	Complied
1.1.3	<b>(C)</b> Records of requests for information and responses are maintained.	Verification of information request documents and responses that are well documented in the "Incoming Letter and Response" Logbook. In the	Complied

	<p>- Critical (Major) compliance -</p>	<p>period of 2023, there is 15 requests for information letter from stakeholders that have been responded to, such as:</p> <ol style="list-style-type: none"> <li>1. Request for information from the Head of Manpower Office, Tanjung Jabung Barat Regency on 04/10/2022, related to requests information for Employment Report of PT Inti Indosawit Subur Tungkul Ulu POM including Work Agreement, PKWT Report, Company Regulation/Peraturan Perusahaan, Health and Accident Assurance. It has been responded on 11/10/2022 by providing Employment Report refers to Letter No. 164/SM-EXT/MEMO/X/2022 from General Manager.</li> <li>2. Request for information dated 10/01/2023 from Head of Manpower Office, Tanjung Jabung Barat Regency related to request information of Bipartite Report. This request has been responded on 14/01/2023 by providing Bipartite Report refers to Letter No. 005/SM-EXT/KTU/I/2023 from General Manager.</li> <li>3. Request for information on 2/01/2023 from the Head of BKSDA regarding the request information of Monitoring of Flora and Fauna Report Semester II 2022. It has been responded on 06/01/2023, that the company has provided Flora and Fauna Monitoring Report of Semester II 2022.</li> </ol> <p>Some of the information that is specifically submitted to the relevant government agencies, including:</p> <ol style="list-style-type: none"> <li>1. The Land Application and Domestic Waste Report for the January 2023 period was submitted to the Jambi Provincial Environment Office on 11 May 2023 and Dinas Lingkungan Hidup Tanjung Jabung Barat Regency on 16 May 2023.</li> <li>2. The B3 Waste Report for the January – March 2023 period has been submitted to the Tanjung Jabung Barat Regency Environmental Office on May 16, 2023.</li> <li>3. The RKL-RPL Environmental Permit Implementation Report for the period January – June 2022, was submitted to the Environmental</li> </ol>	
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		<p>Office of Tanjung Jabung Barat Regency and Jambi Province on 6 September 2022.</p> <p>4. The RKL-RPL Environmental Permit Implementation Report for the period July – December 2022, was submitted to the Environmental Office of Tanjung Jabung Barat Regency and Jambi Province on 1 February 2023.</p> <p>Based on the verification of the above documents, that the company has responded to requests for information from stakeholders in accordance with established procedures Mekanisme Penanganan Permintaan Informasi Stakeholder (No. SOP; AA-GL-5008.1-R1) dated 22 August 2011.</p> <p><b>Scheme smallholder</b></p> <p>KUD Karya Kita, KUD Karya Jaya, KUD Sari Bumi and KUD Sawit Mulia: According to "Buku Surat Masuk – Surat Keluar" period 2022 and 2023, there is no request of information from stakeholders.</p> <p>Taken sample of information request and response:</p> <ol style="list-style-type: none"> <li>1. Request for information from residents of Intan Jaya Village on January 11, 2023 on behalf of Ikhsan Hadi regarding the repair of the village axis road, has been responded to on January 11, 2023 that it will soon be repaired using bakhie loader heavy equipment.</li> <li>2. On April 17, 2023, a request for information from the people of Tanjung Benanak Village on behalf of Fahrurozi regarding a request for assistance for the repair of the Village Mosque. It has been responded by KUD Karya Kita on April 17, 2023 that it will soon be budgeted for the repair of the Village Mosque.</li> <li>3. On January 8, 2023, a request for information from the Head of Bukit Harapan Village regarding assistance in implementing MTQ at the Merlung District Level. It has been responded on January 8, 2023 by providing funds for MTQ activities of IDR 2,000,000.</li> </ol>	
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<p>1.1.4</p>	<p><b>(C)</b> Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official.</p> <p>- Critical (Major) compliance -</p>	<p>Until this surveillance audit, there are no changes related to communication and consultation procedures with stakeholders, namely: "Mekanisme Penanganan Permintaan Informasi Stakeholder" (SOP No.; AA-GL-5008.1-R1) dated 22 August 2011. It is explained that information request can be receive by oral or written, or by representative of communities; the company will respond according to respective authorities, starts from KTU from Estate (Mrs Nur Hutasoit from Estate and Mr Mitra Prasetyo from Mill), Estate/Mill manager, Group Manager and Regional Office.</p> <p><b>Scheme smallholder</b></p> <p>There are no changes related to the communication and consultation mechanism "Consultation and communication procedures are documented, disclosed and explained again to all stakeholders" dated 09-11 November 2022. This mechanism is explained in the form of a flow chart which describes the process of incoming information requests until the response is given. Responsibility for responding to information from stakeholders is carried out by the Field Assistant who will then be assigned to the Area Manager.</p> <p>Each farmer member has a "Plasma Farmer's Guidebook and Notes", which explains the flow of the consultation and communication process. Communication both written and verbal to group administrators is acceptable.</p> <p>Communication and consultation mechanisms are also available on notice boards in each small farmer cooperative office.</p> <p>Based on interviews with several sample farmers during the audit, in general they knew and understood it well enough. This was proven during interviews to explain the communication process between farmer-cooperatives and ICS.</p>	<p>Complied</p>
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**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

<p>1.1.5</p>	<p>An up-to-date list of contacts and detailed stakeholder information is available along with designated representatives.</p> <p>- Minor compliance -</p>	<p>The list of stakeholders is always updated every year, the Certification unit has updated the list of stakeholders as of January 16, 2023 which is divided into several regions: Provinces, Districts and Districts as well as local. The list records address, contact person, email address, number, telephone, relationship of interest.</p> <p>In the provincial area, there are 18 stakeholders consisting of related government offices, Jambi Regional Police and education agencies.</p> <p>In the Batanghari Regency area, there are 11 stakeholders, including: district-level government offices, APKASINDO (Association of Palm Oil Farmers throughout Indonesia), social media (Media Batang Hari Express), NGOs (10 NGO local and National).</p> <p>In the sub-district area, there are 11 stakeholders, including: Polsek, Puskesmas, Sub-district and Maro Sebo Ilir Sub-District Cooperative Forum.</p> <p>In the surrounding village area, there are 32 stakeholders, including: KUD which is a plasma/partnership with PT IIS, Village Head (11 villages around the Plantation).</p>	<p>Complied</p>
<p><b>Criteria 1.2:</b> The unit of certification commits to ethical conduct in all business operations and transactions.</p>			
<p>1.2.1</p>	<p>A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.</p> <p>- Minor compliance -</p>	<p><i>There was no change related to the ethical conduct policy.</i></p> <p>Since 2019, the company has policies related to the code of ethics and was signed by the Managing Director on December 1, 2019 which until this surveillance has not changed. The policy was disseminated to all employees through the company policy notice board and by direct dissemination, e.g.:</p> <ol style="list-style-type: none"> <li>1. On 11 January 2022, dissemination has conducted in Tungkal Ulu Estate and attended by 27 employees, on 2 February 2022 attended by 21 employees, on 7 March 2022 attended by 25 employees and on 4 April 2022 attended by 22 employees.</li> </ol>	<p>Complied</p>

		<p>2. Dated 11 April 2022, dissemination has conducted in Tungkal Ulu Mill attended by 14 employees.</p> <p>3. In 2023, dissemination has performed on 21-22 February 2023 attended by 29 participants from Mill and on 25-27 January 2023 which attended by 34 participants form Tungkal Ulu Estate and also dissemination to contractor and supplier on 22 May 2023 attended by 7 contractors and supplier and socialization was conducted on 10 March 2023 attended by 14 contractors and supplier as well.</p> <p>In the recruitment process, policies related to business ethics have been implemented as outlined in the Work Agreement, both PHL, PKWT, and in the Collective Labor Agreement (PKB period 2023-2025) as well, and its mentioned. Collective Labor Agreement (PKB) has been registered on the Manpower Office of Tanjung Jabung Barat Regency with register number: 565.362/16/HI/2023 dated 9 January 2023.</p> <p>Concerning Disgraceful Actions/Conducts of Workforce Causing the Termination of Work Agreements; "Performing and/or being involved directly or indirectly in a fraud and/or theft and/or embezzlement of goods and/or money belonging to the company, embezzling money belonging to the company, receiving money gifts from other parties because of work results".</p> <p>The PKB for the 2023-2025 period has explained business ethics in article XXII concerning "Obligations of Companies and Employees"; among others: employers and workers must maintain good morals and not conflict with legal norms and moral values, employers and workers must comply with and enforce all applicable laws and regulations on Manpower.</p> <p>Based on the Contractor's Work Agreement, the work contract document has been agreed and must be applied, including:</p> <p>1. Fulfillment of obligations to laws and regulations.</p>	
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		<ol style="list-style-type: none"> <li>2. Prohibition of child labor (under 18 years of age)</li> <li>3. Prohibition of forced labor</li> <li>4. Must be ethically applicable in all operations and transactions</li> </ol> <p>This statement was mention in document of contract particularly in Pasal 12; Tanggung Jawab. List of contractors please see 2.2.1</p> <p>Sample of contract has been verified:</p> <ol style="list-style-type: none"> <li>1. Heavy equipment rental contract document no. 009/E3KTU/01/23 dated 2 January 2023 between PT Inti Indosawit Subur (Tungkal Ulu) and PT Uniteda Arkato.</li> <li>2. Heavy equipment rental contract document no. 014/E3KTU/01/23 dated 2 January 2023 between PT Inti Indosawit Subur (Tungkal Ulu) and PT Aneka Sumatrindo.</li> <li>3. Contract Agreement No. 111/E3KTU/02/2023 dated 1 February 2023 between PT Inti Indosawit Subur (Tungkal Ulu) and Mr. Heryanto for the work of making and installing concrete culverts in the Tungkal Ulu Estate.</li> </ol> <p>Based on interviews with several workers who had just joined PT IIS-Tungkal Ulu Mill and Estate, that in the recruitment process there was no set fee.</p> <p><b>Scheme Smallholders:</b></p> <p>There is no change regarding Code of Ethical Business Policy that included on "Kebijakan Manajer Group ICS" signed on 11 August 2020.</p> <p>This policy has been socialized or conveyed to all farmers in each koperasi. Disseminated to each member of Cooperative through the "Kegiatan Refresh Pelatihan P&amp;C RSPO" was performed on 9 March 2022 attended by 62 smallholders where in point 2 stated "Committed to ethical conduct</p>	
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		<p>in business in overall transactions and business operations, prohibition all forms of corruption, bribery and fraud in the use of funds and resources".</p> <p>Document verification shows that all farmer members have stated approval of all policy issued by Smallholder Manager, including policy related to code of ethic which described in the Agreement Letter. Document seen: Member of KUD Karya Kita, KUD Karya Jaya, KUD Sari Bumi and KUD Sawit Mulia.</p>	
<p>1.2.2</p>	<p>A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.</p> <p>- Minor compliance -</p>	<p>There is no change related to the mechanism to monitor the implementation of the code of ethics of PT IIS – Tungkal Ulu Group including plasma farmers has a mechanism regarding guarantees that the implementation of the code of ethics is carried out properly, there are several mechanisms to ensure that this code of ethics has been implemented, namely:</p> <ol style="list-style-type: none"> <li>1. Procedure AA-GL/510.1-R0 regarding reporting and disclosure of cases; where Field Assistant will convey the information to the GM and keep the reporting party confidential. GM and Public Relations provide a maximum response of 14 days. Based on interviews with stakeholders (including contractors and heads of villages around the plantation), that up to this surveillance audit there had been no cases of violations of the code of ethics.</li> <li>2. For whistle blower cases, refer to related procedures: refer to procedure AA-GL-5009.1 R0 settlement with the local community and settlement of employee complaints related to employment refer to Procedure AA-HR-308.5-R0. Based on interviews with the heads of the trade unions and the gender committee, up to this surveillance audit there has been no violation of the code of ethics.</li> <li>3. Procedure no. AA-SOP-ES-6001-R5 regarding Internal Audit, this mechanism is to ensure that company policies including the company's code of ethics have been implemented properly. Internal audit Dept. Visit. Agronomy was carried out on 29 May – 3 June 2023 and Dept. Engineering Visits were carried out on 29-30 June 2022.</li> </ol>	<p>Complied</p>

		With this internal audit (Visit Agronomy at Estate and Visit Engineering at Mill), the company can identify the existence of storage practices against the company's code of ethics policy.	
<b>Principle 2: Operate legally and respect rights</b> Implement legal requirements as the basic principles of operation in any jurisdiction.			
<b>Criteria 2.1:</b> There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	<b>(C)</b> The unit of certification complies to relevant regulations. - Critical (Major) compliance -	The organization has provided a list of relevant laws and regulation and its compliance evaluation. The evaluation was conducted annually as per " <i>Evaluasi Kepatuhan Peraturan Perundangan</i> ", the latest was updated in February 2023. No new regulation issued on 2022 so the latest regulations are: <ul style="list-style-type: none"> <li>• Peraturan Pemerintah (PP) Nomor 5 Tahun 2021 regarding Penyelenggaraan Perizinan Berusaha Berbasis Risiko.</li> <li>• Peraturan Pemerintah (PP) Nomor 6 Tahun 2021 regarding Penyelenggaraan Perizinan Berusaha di Daerah.</li> <li>• Peraturan Pemerintah (PP) Nomor 20 Tahun 2021 regarding Penertiban Kawasan dan Tanah Terlarang.</li> <li>• Peraturan Pemerintah (PP) Nomor 22 Tahun 2021 regarding Penyelenggaraan Perlindungan dan Pengelolaan Lingkungan Hidup.</li> <li>• Peraturan Pemerintah (PP) Nomor 26 Tahun 2021 regarding Penyelenggaraan Bidang Pertanian.</li> <li>• Peraturan Pemerintah (PP) Nomor 31 Tahun 2021 regarding Penyelenggaraan Bidang Pelayaran.</li> <li>• Peraturan Pemerintah (PP) Nomor 35 Tahun 2021 regarding Perjanjian Kerja Waktu Tertentu, Alih Daya, Waktu Kerja dan Waktu Istirahat, dan Pemutusan Hubungan Kerja.</li> <li>• Peraturan Pemerintah (PP) Nomor 36 Tahun 2021 regarding Pengupahan.</li> </ul>	Complied

		<ul style="list-style-type: none"> <li>Peraturan Pemerintah (PP) Nomor 37 Tahun 2021 regarding Penyelenggaraan Program Jaminan Kehilangan Pekerjaan</li> </ul> <p>Based on evaluation, the organizations have complied to the new regulations as mentioned as above.</p> <p><b>Scheme smallholder:</b></p> <p>Plasma management of Tungkal Ulu conducted the evaluation of laws and regulation compliance each year. Latest updated was on 1 January 2023. During audit, Group manager can demonstrate the document of "<i>Evaluasi Kepatuhan Hukum Kebun Plasma Tungkal Ulu Tahun 2023</i>" 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.</p> <p>Records of sampled organizations legal document are:</p> <ol style="list-style-type: none"> <li>KUD Sawit Mulia           <ul style="list-style-type: none"> <li>"Akta Pendirian Koperasi KUD Sawit Mulia" approval from Departemen Koperasi dan Pembinaan Pengusaha Kecil based on decree letter No. 07/BH/KWK.5/I/1996 dated 8 January 1996.</li> <li>NIB No. 8120013211804 dated 10 December 2018</li> </ul> </li> <li>KUD Karya Jaya           <ul style="list-style-type: none"> <li>"Akta Pendirian Koperasi KUD Karya Jaya" approval from Departemen Koperasi dan Pembinaan Pengusaha Kecil based on decree letter No. 1014/BH/XV dated 12 September 1992.</li> <li>NIB No. 9120005540861 dated 6 May 2019</li> </ul> </li> <li>KUD Karya Kita</li> </ol>	
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		<ul style="list-style-type: none"> <li>• "Akta Pendirian Koperasi KUD Karya Kita" approval from Departemen Koperasi dan Pembinaan Pengusaha Kecil based on decree letter No. 30/BH/PAD/KWK.5/II/1996 dated 2 February 1996.</li> <li>• NIB No. 9120102122228 dated 22 January 2019</li> </ul> <p>d. KUD Sari Bumi</p> <ul style="list-style-type: none"> <li>• "Akta Pendirian Koperasi KUD Sari Bumi" approval from Departemen Koperasi dan Pembinaan Pengusaha Kecil based on decree letter No. 104/BH/PAD/KWK.5/III/1996 dated 27 March 1996.</li> <li>• NIB No. 9120014032785dated 28 October 2019</li> </ul>	
2.1.2	<p>A documented system for ensuring legal compliance is in place. This system has means to track changes to the law and also includes listing and evidence on evaluation of legal compliance of all contracted third parties, such as: recruitment agencies, service provider and labour contractor.</p> <p>- Minor compliance -</p>	<p>Public affair department conducts annual evaluation of legal compliance. The last evaluation conducted in January 20223, documented in "<i>Evaluasi Kepatuhan Hukum PT IIS (Tungkal Ulu Group) Tahun 2023</i>". No new regulation issued in 2022 so the latest regulations are:</p> <ul style="list-style-type: none"> <li>• Peraturan Pemerintah (PP) Nomor 5 Tahun 2021 regarding Penyelenggaraan Perizinan Berusaha Berbasis Risiko.</li> <li>• Peraturan Pemerintah (PP) Nomor 6 Tahun 2021 regarding Penyelenggaraan Perizinan Berusaha di Daerah.</li> <li>• Peraturan Pemerintah (PP) Nomor 20 Tahun 2021 regarding Penertiban Kawasan dan Tanah Terlantar.</li> <li>• Peraturan Pemerintah (PP) Nomor 22 Tahun 2021 regarding Penyelenggaraan Perlindungan dan Pengelolaan Lingkungan Hidup.</li> <li>• Peraturan Pemerintah (PP) Nomor 26 Tahun 2021 regarding Penyelenggaraan Bidang Pertanian.</li> <li>• Peraturan Pemerintah (PP) Nomor 31 Tahun 2021 regarding Penyelenggaraan Bidang Pelayaran.</li> <li>• Peraturan Pemerintah (PP) Nomor 35 Tahun 2021 regarding Perjanjian Kerja Waktu Tertentu, Alih Daya, Waktu Kerja dan Waktu Istirahat, dan Pemutusan Hubungan Kerja.</li> </ul>	Complied

		<ul style="list-style-type: none"> <li>• Peraturan Pemerintah (PP) Nomor 36 Tahun 2021 regarding Pengupahan.</li> <li>• Peraturan Pemerintah (PP) Nomor 37 Tahun 2021 regarding Penyelenggaraan Program Jaminan Kehilangan Pekerja</li> </ul> <p>Based on evaluation, the organizations have complied to the new regulations as mentioned as above</p>													
<p>2.1.3</p>	<p>Legal or authorized boundaries are clearly demarcated and visibly maintained and there is no planting beyond these legal or authorized boundaries.</p> <p>- Minor compliance -</p>	<p><b>Tungkal Ulu Estate:</b>          According to the national regulation, land title (HGU) holder shall maintain the condition of boundary poles. Based on field visit in Tungkal Ulu Estate concluded that the boundary poles area well maintained. For example:</p> <table border="1" data-bbox="1093 730 1906 1027"> <thead> <tr> <th>ID HGU pole</th> <th>Location</th> <th>Condition</th> </tr> </thead> <tbody> <tr> <td>46</td> <td>Adjacent border with Desa Merlung</td> <td>Good</td> </tr> <tr> <td>70</td> <td>Adjacent border with Desa Lampisi</td> <td>Good</td> </tr> <tr> <td>71</td> <td>Adjacent border with Desa Lampisi</td> <td>Good</td> </tr> </tbody> </table> <p>Trench boundary to separate own estate and independent smallholder is available along the plantation.</p> <p><b>Scheme smallholder:</b>          For smallholders, based on field visit, the boundaries are well demarcated in the form of land title (SHM) stake, path, drain, trees, etc. There is no indication of dispute among the plots as well with external parties.</p>	ID HGU pole	Location	Condition	46	Adjacent border with Desa Merlung	Good	70	Adjacent border with Desa Lampisi	Good	71	Adjacent border with Desa Lampisi	Good	<p>Complied</p>
ID HGU pole	Location	Condition													
46	Adjacent border with Desa Merlung	Good													
70	Adjacent border with Desa Lampisi	Good													
71	Adjacent border with Desa Lampisi	Good													
<p><b>Criteria 2.2:</b> All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.</p>															

<p>2.2.1</p>	<p>A list of contracted parties is available.          - Minor compliance -</p>	<p>PT IIS – Tungkal Ulu Group has created and updated monthly basis of list of contractors for the 2022-2023 period, including:</p> <ul style="list-style-type: none"> <li>• PT Uniteda Arkato (Contractor – Heavy Equipment)</li> <li>• CV Alam Cahaya Cemerlang (Contractor – Heavy Equipment)</li> <li>• PT Multi Raya Perkasa (Contractor – Heavy Equipment)</li> <li>• Halasan Sianipar (FFB and EFB Transporter)</li> <li>• Suranto Barus (FFB and EFB Transporter)</li> <li>• PT Trans Jaya Pertama (CPO Transporter)</li> <li>• PT Mitra Abadi Damai (PK Transporter)</li> <li>• PT IKU (FFB Supplier)</li> </ul> <p><b>Smallholder:</b></p> <p>Based on a sample of smallholders at four cooperatives (KUD Karya Kita, KUD Karya Jaya, KUD Sari Bumi and KUD Sawit Mulia), only palm oil plants in KUD Karya Kita are still immature (plants that have not yet produced fruit), while the other 3 cooperatives have productive plants. This FFB transportation agreement document is always updated every year, this is related to the adjustment of the FFB loading price.</p> <p>Contract of FFB transport for scheme smallholder as below:</p> <ol style="list-style-type: none"> <li>1. KUD Karya Jaya: "Surat Perjanjian Kerja Angkutan No: 013/KUD-KJ/VI/2023" dated 6 June 2023. Agreement between: Bpk. Agus (FFB transporter) and KUD Karya Jaya.</li> <li>2. KUD Sari Bumi: "Surat Perjanjian Kerja Angkutan No: 001/KUD-SB/I/2023" dated 9 January 2023. Agreement between: Bpk. Sadikun (FFB transporter) and KUD Sari Bumi.</li> <li>3. KUD Sawit Mulia: "Surat Perjanjian Kerja Angkutan No: 010/KUD-SM/II/2023" dated 12 February 2023. Agreement between: Bpk. Sukirman (FFB transporter) and KUD Sawit Mulia.</li> </ol>	<p>Complied</p>
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<p>2.2.2</p>	<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>- Minor compliance -</p>	<p>During surveillance audit, verification was carried out on the cooperation contractor documents above (2.2.1), that related to the legal requirements described in Article 7: Responsibilities and Obligations, has mentioned on letter f: <i>"Comply with the applicable regulations in Rep. Indonesia and is not involved in forced labor and human trafficking. "(mematuhi peraturan yang berlaku di Rep. Indonesia serta tidak terlibat dalam praktik kerja paksa dan perdagangan manusia)"</i>.</p> <p>Based on document verification of third-party contract (EFB and decanter cake transporter) on behalf of Halasan Sianipar &amp; Suranto Borus (FFB &amp; EFB Transports) and obtained information that the contract contain specific clause as follows:</p> <ul style="list-style-type: none"> <li>• Name and personal address both parties, date, and kind of agreement.</li> <li>• Scope of agreement</li> <li>• Requirement</li> <li>• Duration</li> <li>• Detail of agreement</li> <li>• Price</li> <li>• Payment method</li> <li>• Measurement</li> <li>• Responsibilities</li> <li>• Contractor Guarantee: (covering statement to follow company procedure, registered their workers in worker insurance program, PPE usage, no child labour and other environmental procedures)</li> <li>• Sanction</li> <li>• End of agreement terms</li> <li>• Force majeure</li> <li>• Manipulation and bribery</li> </ul>	<p>Complied</p>
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		<ul style="list-style-type: none"> <li>• Addendum</li> <li>• Court settlement</li> <li>• Signed both parties</li> </ul>									
2.2.3	<p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour.</p> <p>- Minor compliance -</p>	<p>Based on document verification and interviews with several contractors, Heru Prayetno as the security post construction contractor with agreement document no. 179/E3KMB/05/23 and Suranto Barus as FFB/EFB transporter with agreement document no. 035/E3KMB/01/23, that information related to child labor, forced labor and the labor trafficking has been stated in the contract document Article 7; Responsibilities and Obligations, letters of:</p> <p><i>e. do not employ minors (18 years)</i></p> <p><i>f. not involved in the practice of forced labor and labor trafficking.</i></p> <p>Based on interviews with several of the contractors, they stated that they had complied with the requirements contained in the agreement document and based on field observations, they did not identify the practice of child labour, forced labor or labor trafficking.</p>	Complied								
<p><b>Criteria 2.3:</b> All FFB supplies from outside the unit of certification are from legal sources.</p>											
2.3.1	<p><b>(C)</b> For all directly sourced FFB, Palm Oil Mill (POM) requires:</p> <ul style="list-style-type: none"> <li>• Information regarding the geolocation of FFB origins;</li> <li>• Proof of ownership status, right/claim of the land by grower/smallholder;</li> <li>• If relevant, valid planting/operational/trading license, or is part of a cooperative which allows the buying and selling of FFB.</li> </ul> <p>- Critical (Major) compliance -</p>	<p>The organization has maintained the data of the directly sourced FFB. The information regarding the geolocation and proof of ownerships status and IUP as also verified during ASA2.1 audit.</p> <p>Tungkal Ulu POM receives FFB from its own estate, smallholders' scheme, out grower and independent smallholders. For directly sources FFB, Tungkal Ulu POM has collect the information regarding the geolocation, proof of ownership status, trading licence and other relevant information including contract. The directly FFB supplier as follows:</p> <table border="1" data-bbox="1093 1273 1928 1343"> <thead> <tr> <th>FFB Sources</th> <th>Coordinate Geolocation</th> <th>Hectare (ha)</th> <th>Land Certificate</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	FFB Sources	Coordinate Geolocation	Hectare (ha)	Land Certificate					Complied
FFB Sources	Coordinate Geolocation	Hectare (ha)	Land Certificate								

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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>- Minor compliance -</p>	<p>During this ASA2.1 audit, for indirectly sources FFB, the Tungkal Ulu POM has collected the information regarding the geolocation, proof of ownership status, trading licence and other relevant information including contract. Below is the information of indirectly source FFB verified during audit:</p> <table border="1"> <thead> <tr> <th rowspan="2">FFB Sources</th> <th colspan="2">Coordinate Geolocation</th> <th rowspan="2">Hectare (ha)</th> <th rowspan="2">Land Certificate</th> </tr> <tr> <th>Longitude</th> <th>Latitude</th> </tr> </thead> <tbody> <tr> <td>Novie Zulhi</td> <td>1°18'19.20" S</td> <td>103°03'05.05" E</td> <td>2,675.43</td> <td>SHM</td> </tr> <tr> <td>Hasbullah/HD</td> <td>1°19'22.27" S</td> <td>102°53'24.46" E</td> <td>3,803.5</td> <td>SHM</td> </tr> </tbody> </table>	FFB Sources	Coordinate Geolocation		Hectare (ha)	Land Certificate	Longitude	Latitude	Novie Zulhi	1°18'19.20" S	103°03'05.05" E	2,675.43	SHM	Hasbullah/HD	1°19'22.27" S	102°53'24.46" E	3,803.5	SHM	Complied																																						
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<p><b>Principle 3: Optimise productivity, efficiency, positive impact and resilience</b>          Implement plans, procedures and systems for continuous improvement.</p>			
<p><b>Criteria 3.1:</b> 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><b>(C)</b> 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>- Critical (Major) compliance -</p>	<p>Certificate holder has provided long-term management plan in document <i>Rencana Jangka Panjang period 2023 – 2025</i>. This document described the three-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 2023 – 2025</i>. The long-term management plan covered parameter as follows:</p> <ul style="list-style-type: none"> <li>• Hectare statement of mature and immature area</li> <li>• Estimation of production (Tonnes)</li> <li>• Estimation of FFB purchase (for Mass Balance Mill)</li> <li>• Extraction projected (%)</li> <li>• Cost estimation (IDR/Kg)</li> <li>• Estimation of price (IDR/Tonnes)</li> <li>• Estimation of profit (IDR)</li> </ul> <p>The same information of long-term management plan document also sighted for smallholders.</p> <p>Based on interview with sustainability staff, PT Inti Indosawit Subur has started to engage with independent smallholder named Create Share Value (CSV) near the Inti Indosawit Subur’s concession since a couple year ago and renewed annually.</p>	Complied
3.1.2	<p>An annual replanting programme projected for a minimum of five years with yearly review, is available.</p> <p>- Minor compliance -</p>	<p><b>Own Estate</b></p> <p>According to the long-term management plan period 2023 – 2024, certificate holder has had annual replanting program as follows:</p>	Non-compliance

		<ul style="list-style-type: none"> <li>• 2023: 630 Ha</li> <li>• 2024: 252 Ha</li> </ul> <p><b>Scheme smallholder:</b>  Based on document review during ASA2.1 it was known that according to the smallholder projection 2023 – 2024 obtained the replanting estimation as follows:</p> <ul style="list-style-type: none"> <li>• 2023: 630 Ha</li> <li>• 2024: 252 Ha</li> </ul> <p>During audit, obtained information that replanting activity has conducted since 2020 until present. There was no fire usage during that process.</p>	
3.1.3	<p>The unit of certification holds management review at planned term according to the scale and nature of the activities undertaken.</p> <p>- Minor compliance -</p>	<p>Certificate holder usually set the annual report. Those documents will bring into annual management review meeting. The result of the management review meeting has shown during audit.</p> <p>Management review conducted once a year as per “Standard Operating Procedures for Internal Audit and Management Review (AA-SOP-ES-6001-R5 dated 1 August 2020)”. Latest management review conducted on 6 February 2023. Minutes of management review and attendance list for management review are available.</p> <p>Management reviews are including the internal audit result review. The company has annual internal audit activity namely Visit Agronomy (VA) and Visit Engineering (VE) and Internal Audit of ISPO – RSPO.</p> <p><b>Tungkal Ulu Estate:</b>  Sighted Report of Visit Advisory (VA) June 2022 by Subramaniam Perumal as per VA Report-INTI No. VA/KTU/OCT/FULL/06-2022. There are several issues during this visit, for example: flatbeds (POME applications) still have been silted up, weeding manual, upkeep activity. All the issues have been closed by organization in August 2022.</p>	Complied



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**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>	<p><b>(C)</b> 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>- Critical (Major) compliance -</p>	<p>Certificate holder has established the continuous improvement for 2022/2023 that has been implemented, for example:</p> <p><b>Tungkal Ulu Estate:</b></p> <p>One of the efforts to increase crop productivity is by "Improving Road Quality by Modifying Cross Drain" The objective is All Paths Accessible, longer cross drain replacement/repair lifetime and longer cross drain replacement/repair lifetime.</p> <p>Continuing improvements from the last year related to counting the production estimation in 1 semester using application of Bluetooth Remote Camera for the mature area especially for the high trees "tanaman/pokok tinggi", the objective is for improve the counting accuracy of census of FFB.</p> <p><b>Tungkal Ulu POM:</b></p> <p>For Y2022/2023, Tungkal Ulu POM still continuing improvements from the last year namely:</p> <ul style="list-style-type: none"> <li>a. Reduce oil losses on press fibre.</li> <li>b. Reduce oil losses on heavy phase.</li> <li>c. Reduce oil losses on empty fruit bunch.</li> <li>d. Improve quality outside FFB and improve boiler equipment and operations strategy.</li> <li>e. Adjust feeding POME to digester according to parameter of VFA, PH at Digester Tank for every day.</li> </ul> <p>For social and environmental aspect, organization has implemented some of the continuous improvement, namely:</p> <ul style="list-style-type: none"> <li>- Social Aspect: increasing communication with the community by conducting public consultations through religious events.</li> <li>- Environmental Aspect: at Palm Oil Mill carried out reduce exhaust emissions from the engines by maintenance routine engine, dust</li> </ul>	<p>Complied</p>
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		<p>bin installation in boiler stack and design the height of boiler stack as per regulation, planting the crops to reduce the pollutant/absorb the pollutant near POM, limiting the vehicle speed around POM.</p> <p>Estate: The Company has made a conservation management and monitoring plan to protect and conserve RTE species and monitor the presence of wildlife species and wildlife populations as well as protected plants/animal in and around the plantation</p>	
3.2.2	<p>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> <p>- Minor compliance -</p>	<p>RSPO Annual Communication of Progress 2021 of PT Inti Indosawit Subur has been available in RSPO website under membership number 1-0022-06-000-00. At the time of the audit, the RSPO Metrics template was submitted and verified by the auditor.</p>	Complied
<p><b>Criteria 3.3:</b> Operating procedures are appropriately documented, consistently implemented and monitored.</p>			
3.3.1	<p><b>(C)</b> Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p>During this ASA2.1 audit there is no revision of the SOPs for estate and mill, the SOP are in place namely:</p> <p><b>Own Estates</b></p> <p>Estate has Standard Operational Procedures (SOP) that covers the entire operational activity as follows:</p> <ol style="list-style-type: none"> <li>1. SOP AA-APM-OP-1100.01-R4 dated 5 September 2016: <i>Pembibitan</i> (Nursery).</li> <li>2. SOP AA-APM-OP-1100.02-R3 dated 10 June 2015: <i>Penanaman Areal Baru</i> (New Planting).</li> <li>3. SOP AA-APM-OP-1100.03-R2 dated 24 July 2015: <i>Pembuatan dan Perawatan Jalan dan Jembatan</i> (Road and Bridge construction and maintenance).</li> <li>4. SOP AA-APM-OP-1100.04-R3 dated 7 Decemeber 2015: <i>Pembuatan dan Pemeliharaan Parit</i> (Drainage Construction and Maintenance).</li> <li>5. SOP AA-APM-OP-1100.05-R3 dated 23 November 2016: <i>Konservasi</i></li> </ol>	Complied

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		<p><i>Tanah dan Air</i> (Soil &amp; Water Conservation).</p> <ol style="list-style-type: none"> <li>6. SOP AA-APM-OP-1100.06-R6 dated 16 February 2017: <i>Menanam kacang</i> (Planting cover crops).</li> <li>7. SOP AA-APM-OP-1100.07-R6 dated 16 February 2017: <i>Menanam Kelapa Sawit</i> (Planting Oil Palms).</li> <li>8. SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i> (Weed control).</li> <li>9. SOP AA-APM-OP-1100.09. R5 dated 26 December 2018: <i>Pemupukan</i> (Fertilizer application).</li> <li>10. SOP AA-APM-OP-1100.10. R6 dated 23 November 2016: <i>Pengendalian Hama dan Penyakit</i> (Pests &amp; Disease Control).</li> <li>11. SOP AA-APM-OP-1100.11. R1 dated 1 February 2009: <i>Pestisida dan Pengendaliannya</i> (Pesticide Handling).</li> <li>12. SOP AA-APM-OP-1100.12. R3 dated 23 November 2016: <i>Kastrasi</i> (Palm castration) explain cutting all generative product (mal flower, female flower, all fruit, to support vegetative growth) – done 5-6 months before being harvested.</li> <li>13. SOP AA-APM-OP-1100.13. R3 dated 4 March 2016: <i>Tunas Pokok</i> (Pruning).</li> <li>14. SOP AA-APM-OP-1100.14. R3 dated 16 February 2017: <i>Sensus dan Identifikasi Pokok</i> (Census and Palm Identification).</li> <li>15. SOP AA-APM-OP-1100.15. R2 dated 1 October 2010: <i>Sensus Produksi</i> (Production Census).</li> <li>16. SOP AA-APM-OP-1100.16. R1 dated 1 February 2009: <i>Konsolidasi Pohon Tumbang</i> (Provision of Support to Fallen Palm).</li> <li>17. SOP AA-APM-OP-1100.17. R1 dated 23 October 2014: <i>Pengelolaan Air</i> (Water Management).</li> <li>18. SOP AA-APM-OP-1100.18. R3 dated 20 April 2015: <i>Potong Buah</i> (Harvesting).</li> </ol>	
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		<p>19. SOP AA-APM-OP-1100.19. R1 dated 1 February 2009: <i>Pengelolaan Transport</i> (FFB Transport).</p> <p>20. SOP AA-APM-OP-1100.20-R6 dated 1 May 2019: <i>Peremajaan</i> (Replanting).</p> <p>Tungkal Ulu POM has documented and implemented procedure related to process of FFB to become CPO and PK, starts from FFB receiving to dispatch of CPO and PK:</p> <ol style="list-style-type: none"> <li>1. SOP AA-MPM-OP-1400.02. R2 dated 1 September 2011: <i>Stasiun Penerimaan</i> for FFB Receiving Station;</li> <li>2. SOP AA-MPM-OP-1400.03. R1 dated 1 February 2009: <i>Stasiun Rebusan</i> for Sterilizer;</li> <li>3. SOP AA-MPM-OP-1400.04. R1 dated 1 February 2009: <i>Stasiun Pemisahan Berondolan</i> for Loose Fruit Separation;</li> <li>4. SOP AA-MPM-OP-1400.05-R1 dated 1 February 2009: <i>Stasiun Pengadukan dan Pengempaan</i> for Pressing Station;</li> <li>5. SOP AA-MPM-OP-1400.06-R1 dated 1 February 2009: <i>Stasiun Pemurnian</i> for Clarification;</li> <li>6. SOP AA-MPM-OP-1400.07-R1 dated 1 February 2009: <i>Stasiun Pemisahan Nut dan Fiber</i> for Nut and Fiber Separation;</li> <li>7. SOP AA-MPM-OP-1400.08-R1 dated 1 February 2009: <i>Stasiun Kernel</i> for Kernel Station;</li> <li>8. SOP AA-MPM-OP-1400.09-R1 dated 1 February 2009: <i>Stasiun Boiler</i>;</li> <li>9. SOP AA-MPM-OP-1400.10-R1 dated 1 February 2009: <i>Stasiun Engine Room</i>;</li> <li>10. SOP AA-MPM-OP-1400.11-R1 dated 1 February 2009: <i>Stasiun Water Treatment</i>;</li> <li>11. SOP AA-MPM-OP-1400.12-R1 dated 1 February 2009: <i>Laboratorium</i>;</li> <li>12. SOP AA-MPM-OP-1400.13-R1 dated 1 February 2009: <i>Stasiun</i></li> </ol>	
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		<p><i>Pengelolaan Limbah</i> for Palm Oil Mill Effluent Treatment;</p> <p>13. SOP AA-MPM-OP-1400.14-R2 dated 1 September 2011: <i>Stasiun Penimbunan dan Pengiriman CPO dan Kernel</i> for CPO and PK Bulking and Despatch Operation;</p> <p>14. SOP AA-MPM-OP-1400.15-R1 dated 1 February 2009: <i>Perawatan</i> for Preventive Maintenance;</p> <p>15. SOP AA-MPM-OP-1400.19.R2 dated 1 September 2011: <i>Manajemen dan Metode Menghitung Emisi Gas Rumah Kaca</i> (GHG)</p> <p>16. SOP AA-MPM-OP-1400.18-R4 Book Keeping</p> <p>17. AA-MPM-OP-1400.17-R6 Traceability</p> <p>Those documents above are available in each unit and until ASA2.1, there is no change related to the SOP.</p> <p><b>Scheme smallholder:</b></p> <p>Scheme smallholder has had best management practices procedure as follows:</p> <ol style="list-style-type: none"> <li>1. AA-PLASMA-PP-KS-01 <i>Pembibitan</i> (Nursery)</li> <li>2. AA-APM-OP-1100.09-R3 <i>Pemupukan</i> (Manuring) dated 20 April 2015</li> <li>3. AA-PLASMA-PP-KS-04 <i>Potong Buah</i> (Harvesting)</li> <li>4. AA-PLASMA-PP-KS-05 <i>Pengangkutan TBS</i> (FFB Transport)</li> <li>5. AA-APM-OP-1100.10-R5 <i>Pengendalian Hama dan Penyakit</i> (Pest and Disease Control) dated 11 January 2016</li> <li>6. AA-APM-OP-1100.20-R5 <i>Peremajaan</i> (Replanting) dated 4 March 2016</li> <li>7. AA-MM-508-1-RO <i>Penerimaan TBS Plasma</i> (FFB Plasma Receiving) 1 September 2015</li> <li>8. AA-MM-508-2-RO <i>Penentuan Taksasi TBS Plasma</i> (FFB Plasma Estimation)</li> </ol>	
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		<p>9. AA-APM-OP-1100.8-R5 <i>Pengendalian Gulma</i> (Weed Control)          10. AA-FA-220-2-RO <i>Stempel</i> (Stamp)          11. AA-MPM-OP-1400-17-R6 <i>Ketertelusuran</i> (Traceability) dated 1 September 2017          12. AA-APM-OP-1100.02-R3 <i>Penanaman Area Baru</i> (New Planting)          13. AA-SOP-ES-6001-R4 <i>Audit Internal Sustainability</i> (Internal Audit Sustainability)          14. 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.          15. AA-HR-305.2-RO <i>Rekrutmen dan Seleksi Karyawan</i> (Recruitment and Selection of Employee).          Those documents above are available in each unit, and until ASA2.1, there is no change related to the SOP.</p>	
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place.          - Minor compliance -</p>	<p>Company has a mechanism to check the procedure implementation through internal audit/assessment.  <b>Tungkal Ulu Estate:</b>          Sighted Report of Visit Advisory (VA) June 2022 by Subramaniam Perumal as per VA Report-INTI No. VA/KTU/OCT/FULL/06-2022. There are several issues during this visit, for example: flatbeds (POME applications) still have been silted up, weeding manual, upkeep activity. All the issues have been closed by organization in August 2022.  <b>Tungkal Ulu POM:</b>          Sighted Report of Visit Engineering (VE) dated 30 June 2022 by TCJ Thomas as per VE-PTU-JUL-FULL-06-2022. There are several issues during this visit, for example:          - Loading ramp station: loading ramp cable installation is not perfect and the chute floor on the perron door has holes.</p>	Complied

		<ul style="list-style-type: none"> <li>- Sterilizer station: The ring on the boil door is not cantered.</li> <li>- Clarification Station: The centrifuge hot water pipe does not use flexible pipe.</li> </ul> <p>All the issues have been closed by organization in August 2022.</p> <p><b>Scheme Smallholders:</b></p> <p>There was a record of Deputy Head of Smallholder in October 2022. Based on the minutes of meeting, Coordinator Smallholder Region 3 has captured the issues related to:</p> <ul style="list-style-type: none"> <li>• Replanting program</li> <li>• Implementation of Best Management Practises.</li> </ul> <p>Each smallholder association has had annual monitoring activity to ensure annual target in line with the implementation. Sighted monitoring inspection of plot conditions document year 2022_KUD Karya Jaya, KUD Sari Bumi, KUD Sawit Mulia and KUD Karya Kita. The parameters to be monitored was manuring, harvesting, weeding in circle, pruning and frond stacking.</p>	
3.3.3	<p>Records of monitoring and any actions taken are maintained and available.</p> <p>- Minor compliance -</p>	<p>During the ASA2.1 audit, auditor has observed the records of following action after Visit Agronomy and Visit Engineering. There is some action plan to follow up the findings.</p> <p>Certificate holder 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.</p> <p>Therefore, daily operational activity also recorded in daily worksheet by mill supervisor before reported to the mill manager.</p> <p>To ensuring the result of operational activity in line with the procedures, mill/estate manager conducted regularly monitoring of and management</p>	Complied



		review to solve the findings issues. All results of management review shall be implemented by respective staff.	
<p><b>Criteria 3.4:</b> 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><b>(C)</b> 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>- Critical (Major) compliance -</p>	<p>There are no changes regarding EIA and SIA assessment document compared to last year audit. Updating data or information about the monitoring report and its reporting to government.</p> <p><b>Environmental Impact Assessment:</b></p> <p>PT. Inti Indosawit Subur - Tungkal Ulu POM has demonstrated the document of Analisis Mengenai Dampak Lingkungan (AMDAL) consist of document ANDAL, RKL and RPL as approved through "Persetujuan Komisi Amdal Departemen Pertanian No.014/Andal/RKL-RPL/BA/V/1995 tentang Persetujuan ANDAL dan RKL-RPL perkebunan Kelapa Sawit dan Pabrik Minyak Kelapa Sawit PT Inti Indosawit Subur" dated 3 May 1995.</p> <p>The document covers scope of areal of 32,000 ha consist of Kuala Tungkal Estate 20,000 ha and Muara Bulian Estate 12,000 ha and palm oil mill capacity 90 Tonnes FFB/hour for Kuala Tungkal and 30 Tonnes FFB/hour for Muara Bulian.</p> <p>Revision on AMDAL document is available for PT Inti Indosawit Subur through "Surat Keputusan Bupati Tanjung Jabung Barat No.309, year 2009, dated 6th June 2009, for 4,614.02 ha, consist of 3,503.02 ha, as per "Surat Keputusan Gubernur Kepala Daerah Tingkat I Propinsi Jambi No.342/1987" dated 19 June 1987. And second land title of 1,111 ha as per "Surat Keputusan Bupati Tanjung Jabung Barat No.746, tahun 2006, tentang Izin Lokasi untuk Keperluan Pembangunan Perkebunan Kelapa Sawit Atas Nama PT. IIS, AMDAL also cover 10,277 ha for Plasma and Palm Oil Mill with capacity 60-ton TBS/jam", dated 20 October 2006. AMDAL document produced by Pusat Penelitian Lingkungan Hidup (PPLH) Lembaga Penelitian – Universitas Jambi.</p>	Complied

		<p>PT Inti Indosawit Subur – Tungkal Ulu Group has also prepared Evaluation of Environmental Impact - Aspects (Environmental management system – EMS-431-003-LT) each year, latest assessment conducted in January 2023 for activities of Mill and estate including replanting activities which currently being undertaken by the company. Those utilized as tool to evaluate the implementation of environmental management and monitoring tools.</p> <p>Environmental impact assessment covered in ANDAL, RKL RPL document and environmental aspect and impact, e.g:</p> <p><u>Pre-construction:</u></p> <ul style="list-style-type: none"> <li>• Employee recruitment</li> <li>• Construction</li> <li>• Nursery</li> <li>• Land clearing and planting preparation.</li> <li>• Infrastructure and supporting facility construction and development.</li> <li>• Land preparation</li> <li>• Immature Palm oil plant upkeeping.</li> <li>• Mill location planning</li> <li>• Palm Oil Mill construction</li> </ul> <p><u>Operation:</u></p> <ul style="list-style-type: none"> <li>• Mature plantation upkeeping</li> <li>• Soil and water conservation</li> <li>• Land application (wastewater application to palm oil plantation) and EFB application.</li> <li>• Harvesting and collecting FFB.</li> <li>• FFB transportation to Palm Oil Mill.</li> </ul>	
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		<ul style="list-style-type: none"> <li>• FFB Processing in Palm Oil Mill.</li> <li>• Transportation facility providing and maintenance.</li> <li>• CPO and PK transportation.</li> <li>• Wastewater processing</li> <li>• Replanting</li> <li>• Partnership cooperation</li> </ul> <p><b>Social Impact Assessment:</b>  PT Inti Indosawti Subur has shown the document of social impact assessment, such as:</p> <ol style="list-style-type: none"> <li>1. Document of "Social Impact Assessment PT Inti Indosawit Subur Kebun Tungkal Ulu including Scheme Smallholder" on 2011 by Fakultas Kehutanan Institut Pertanian Bogor dated 11 March 2011. This social impact assessment has also done with a direct approach with affected communities by FGD method conducted on 5 to 10 March 2011. The scope of document is Estate, Mill and Plasma/Smallholder in PT Inti Indosawit Subur Kebun Tungkal Ulu with an area of <b>± 13,858 Ha</b>, which consists of <b>4,556 Ha</b> of Inti plantation (Tungkal Ulu Estae and POM) and <b>10,277 Ha</b> of plasma land area.</li> <li>2. Social Impact Assessment has also available and mentioned within frame references of AMDAL. PT. Inti Indosawit Subur - Tungkal Ulu POM has demonstrated the document of "Analisis Mengenai Dampak Lingkungan (AMDAL)" consist of document ANDAL, RKL and RPL as approved through "Persetujuan Komisi Amdal Departemen Pertanian No.014/Andal/RKL-RPL/BA/V/1995 tentang Persetujuan ANDAL dan RKL-RPL perkebunan Kelapa Sawit dan Pabrik Minyak Kelapa Sawit PT. Inti Indosawit Subur" dated 3 May 1995. The document covers scope of areal of 32,000 ha consist of Kuala Tungkal Estate 20,000 ha and palm oil mill capacity 90 Tonnes FFB/hour for Kuala Tungkal.</li> </ol>	
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		<p>Revision on AMDAL document is available for PT. Inti Indosawit Subur – Tungkal Ulu through "Surat Keputusan Bupati Tanjung Jabung Barat No.309", year 2009, dated 6 June 2009, for 4,614.02 ha.</p> <p>The social risk has been identified for some aspect:</p> <ul style="list-style-type: none"> <li>- Tenurial aspect;</li> <li>- Social aspect related infrastructure;</li> <li>- Employment, industrial relation and workforce absorption aspect;</li> <li>- Environmental aspect;</li> <li>- Relationship in socio-economic interaction with stakeholders around plantation;</li> <li>- Perceptions, expectations and desires of the community against the company;</li> <li>- Forms of land ownership;</li> <li>- Social and economic activity that is required by the community;</li> </ul> <p>The consultation methodology including survey (questionnaire), focus group discussion with surrounding communities, Smallholder, and other interested parties. The records of consultation, attendance list of stakeholders participated in 2011 SIA sighted.</p> <p>Social Environmental monitoring and management report reported in regular basis each semester in "<i>Laporan RKL RPL</i>". Report semester I (Period January – June 2022) and Semester II (Period July – December 2022) has been sent to the government on 6 September 2022 and 1 February 2023.</p> <p><b>Scheme smallholder:</b></p> <p>The social impacts with the participation of internal and external stakeholders such as management, local communities, head of surrounding villages (Cinta Damai Village, Lampisi Village, Tanjung</p>	
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		<p>Benanak Village, Bukit Harapan Village, Pinang Gading Village, Adipurwa Village, Intan Jaya Village, Bukit Indah Village and Kemang Manis Village), farmers and workers and the government bodies relate. Evidence of participation with affected parties is to use a questionnaire conducted on June 20, 2011.</p> <p>Smallholder manager has identified the social aspect and impact has identified such as:</p> <ul style="list-style-type: none"> <li>• Consistency of company for villages development</li> <li>• Company responsibility for road maintenance</li> <li>• Replanting activity</li> <li>• Harvesting and FFB transportation: air pollution and road condition, FFB stealing, FFB quality</li> <li>• FFB pricing mechanism</li> <li>• Labor recruitment and</li> <li>• Land legality</li> </ul> <p>Another Environmental aspect and impact evaluation was also conducted as per "Evaluasi Aspek – Dampak Lingkungan" EMS-431-002-LT updated in February 2023.</p>	
<p>3.4.2</p>	<p>For the unit of certification, a SEIA is available and social and environmental management plan and its monitoring have been developed with participation of affected stakeholders.</p> <p>- Minor compliance -</p>	<p>There are no changes regarding EIA and SIA assessment document compared to last year audit. Updating data or information about the monitoring report and its reporting to government.</p> <p>Environmental Management and Monitoring Plan are available within "Matriks Pengelolaan dan Pemantauan Lingkungan" document. As per document, environment management plan to prevent negative impact such as:</p> <ul style="list-style-type: none"> <li>- To prevent air quality decrease from POM operational and FFB transportation, company performed action: Reduce exhaust emissions from the engines by maintenance routine engine, dust bin installation in boiler stack and design the height of boiler stack as per regulation,</li> </ul>	<p>Complied</p>

		<p>planting the crops to reduce the pollutant/absorb the pollutant near POM, limiting the vehicle speed around POM;</p> <ul style="list-style-type: none"> <li>- To prevent noise from machine and POM operation, company performed isolating the noise source and machine maintenance, planting the crops as a green belt in surrounding POM, regular noise measurement.</li> <li>- To prevent water quality decrease, using palm Oil Mill Effluent (POME) as organic fertilizer (land application), maintaining wastewater treatment plant (IPAL), maintaining and monitoring land application.</li> <li>- To prevent decreasing of biodiversity, company performed enhancing biodiversity in riparian by planting local species, placing signboard to prohibit illegal hunting in conservation area and around estate, awareness to employee and surrounding community to save the protected species.</li> <li>- To prevent social conflict (including list of risk from SIA Report 2011 by Fakultas Kehutanan IPB: tenurial aspect, social aspect related infrastructure, employment, industrial relation and workforce absorption aspect, environmental aspect, relationship in socio-economic interaction with stakeholders around plantation, perceptions, expectations and desires of the community against the company, forms of land ownership, social and economic activity that is required by the community), community perception and enhance the surrounding economic, company provide employment opportunities to the local community, the provision of supporting infrastructure for public economic activities, providing employment opportunities information to the public, optimizing the use of local labor, involving the local community as business partners.</li> </ul> <p>Social Environmental monitoring and management report reported in regular basis each semester in "<i>Laporan RKL RPL</i>". Report semester I (Period January – June 2022) and Semester II (Period July – December</p>	
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		<p>2022) has been sent to the government on 6 September 2022 and 1 February 2023.</p> <p><b>Scheme Smallholder:</b></p> <p>Plasma Tungkal Ulu has set the Environmental aspect and impact assessment as per "Evaluasi Aspek Dampak Lingkungan Kebun Plasma Tungkal Ulu" per February 2023. The mitigation plan for environmental aspect and impact has been defined, e.g:</p> <ul style="list-style-type: none"> <li>- Manuring/Fertilizing – monitoring ex fertilizer sack, appropriate fertilizing as recommendation</li> <li>- Weeds control - Ex Herbicide container store in the hazardous waste storage.</li> <li>- Pest and disease handling: Ex pesticide container store in the hazardous waste storage</li> <li>- FFB transportation: optimizing FFB transportation by designed the TPH (FFB collecting place) in one way along collection road.</li> </ul> <p>During site visit, Smallholder are well aware of the environmental impacts and the mitigation plan.</p>	
<p>3.4.3</p>	<p><b>(C)</b> The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in participatory way.</p> <p>- Critical (Major) compliance -</p>	<p>Based on Government Regulation No. 27/2012 concerning Environmental Permits Article 53 (1) and (2) states that the person in charge of business must prepare a report and submit a report on the implementation of environmental management activities every 6 months. This reporting period is still in accordance with the latest regulations (Government Regulation No. 22 of 2021 concerning Implementation of Environmental Protection and Management, Article 49 (6.f.6)).</p> <p>Social Environment management and monitoring plan as per RKL – RPL document has been implemented by PT Inti Indosawit Subur – Tungkal Ulu Group. Based on verification on Environmental management and monitoring report, confirmed that the management and monitoring plan has been well implemented accordingly. Data verified during audit:</p>	<p>Complied</p>

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		<ul style="list-style-type: none"> <li>• Air quality and noisy monitoring from FFB processing performed by emission measurement against Boiler and generator each semester, ambient air quality measurement each semester, noisy measurement (indoor and outdoor) each semester, odor measurement each semester.</li> <li>• Air emission quality in Tungkal Ulu POM analyze by PT. ITEC Soution Indonesia for Semester I (January – June) and Semester II (July – Desember) 2022. The analysis result since January – December 2022 shown comply with regulation.</li> <li>• Surface water quality and water biota monitoring to prevent and control the physic and chemist quality of surface water comply to PP RI No 22 tahun 2021. Performed by waste water quality monitoring each month, hazardous waste monitoring, land application monitoring, surface water quality monitoring each semester. Waste water quality monitoring analyse by PT Jambi Lestari International. Waste water analysis result since January – December 2022 shown comply with regulation.</li> <li>• Surface water quality test (Benanak River and Lampisi River) analysed by PT. ITEC Solution Indonesia for Semester I (January – June) and Semester II (July – December) 2022. The analysis result since January – December 2022 shown comply with regulation.</li> <li>• Soil quality monitoring performed by soil sampling analysis in "<i>rorak, between rorak and control point</i>", EFB application monitoring, groundwater analysis each year. Analysis conducted by Laboratorium PT. ITEC Solution Indonesia and the results (January – December 2022) shown comply with regulation.</li> <li>• Erosion and sedimentation monitoring performed by erosion measurement according to USLE method. Measurement result since January – December 2022 shown erosion level average below 6 ton/ha/year for Soga and Sei Lala Estate categorized as very good criteria.</li> </ul>	
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		<ul style="list-style-type: none"> <li>• Flora fauna monitoring performed by wildlife monitoring and monitoring the conservation area each month. Monitoring Since January – December 2021 shown that there were species of mammal presence (<i>Macaca fascicularis</i>, <i>Macaca nemestrina</i>, <i>Calosciurus notatus</i>, <i>Sus crofa</i>, <i>Rattus sp</i>, <i>Felis bengalensis</i>, <i>Paradoxurus sp</i>), 13 species of birds (such as: <i>Halcyon smyrnensis</i>, <i>Rhipidura javanica</i>, <i>Centropus bengalensis</i>, <i>Pycnonotus aurigaster</i>), 4 species of reptile (<i>Varanus salvator</i>, <i>fejeverya sp</i>, <i>Mabouya sp</i>, <i>Denrelaphis caudolineatus</i>).</li> <li>• Community perception monitoring performed by community interview, employee data monitoring, interview with village head or public figure regarding their perception to company. Company has monitored the public perception through questioner each year. Questioner to public perception regarding the impact of company presence has been disseminated to surrounding community. Latest monitoring of public perception has been performed in 2022, questioner of public perception can be demonstrated and well documented in RKL-RPL report semester II 2022. Generally public perception was positive regarding the company presence and contribution to the surrounding community.</li> </ul> <p>All management and monitoring plan have been implemented well by company according to RKL-RPL document. The implementation report has been reviewed and reported to government agency per semester (six monthly).</p> <p>During document verification and interview with management, it can be demonstrated that all the environmental monitoring plan has been implemented as per document RKL-RPL. The evaluation of environmental monitoring plan effectivity has been carried out and presented in RKL-RPL report semester II 2022 (July – December 2022).</p> <p>Evaluation consists of:</p>	
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		<ul style="list-style-type: none"> <li>• Trend evaluation of air ambient quality, air emission, odor, ground water quality, wate water quality, surface water quality, soil erosion shown that the result of monitoring is all parameter is met with the standard of regulation. Trend evaluation of water usage still under the budget/standard; biodiversity trend evaluation shown that there were still found the presence of animal including protected animal; Social economic trend evaluation shown increasing each year. Overall, the trend evaluation shown the consistency and increasing in environmental performance.</li> <li>• Critical evaluation, the critical point in environmental monitoring is wastewater quality and surface water usage. Based on result on January - December 2022 was met with regulation (BOD &lt; 5,000 mg/l and pH 6 – 9).</li> <li>• Compliance evaluation to regulation. According to evaluation of impact against soil erosion, water quality, soil quality, air quality, biodiversity, surrounding social and economic, health and safety, indicated that PT Inti Indosawit Subur – Tungkal Ulu POM has comply with all relevant regulation.</li> <li>• Public perception monitoring for 2022 has been carried out and there is no negative perception occurred regarding existence of the company and its operational management. The social risks identified in 3.4.1 has been included in the monitoring plan and reviewed in participatory way.</li> </ul> <p>The management and monitoring plan above including review and update was conducted in participatory way with all relevant stakeholders.</p> <p>Certificate of environmental analysis in Semester II 2022, such as:</p> <ul style="list-style-type: none"> <li>• Clean water, report of analysis D.08.1510-2/LHU/2022 dated 13 September 2022, the result complied to Permenkes No. 492/MENKES/Per/IV/2010.</li> </ul>	
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		<ul style="list-style-type: none"> <li>• Surface water, report of analysis No. D.08.1510-2/LHU/2022 dated 13 September 2022, the result complied to PP RI No. 22 tahun 2021 (Lampiran VI).</li> <li>• Wastewater analysis for December 2022, report of analysis No. LAB-JLI-22121446A dated 22 December 2022.</li> </ul> <p>For environment analysis in Semester, I Y2023 has been conducted but not all of the certificate analysis has been published by the lab.</p>	
<b>Criteria 3.5:</b> A system for managing human resources is in place.			
3.5.1	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives in accordance with the applicable regulation.</p> <p>- Minor compliance -</p>	<p>In general, there are no changes related to employment procedures includes hiring workers, regulated that hiring and promotion that has been set by PT IIS – Tungkal Ulu POM, namely:</p> <ul style="list-style-type: none"> <li>• Procedure for worker recruitment (SDM-A-001-00)</li> <li>• Procedure for employee assessment (HRD C-002-00)</li> </ul> <p>The procedures were available and mentioned there was no discrimination treatment during recruitment and promotion process. These procedures are accordance with the UU no. 13 / 2003 and UU no. 11 year 2021 <i>UU Cipta Kerja</i>.</p> <p>In the recruitment process, the company has set the standard of competence that inferred in the Position Description and Job Profile. Recruitment selection, hiring and promotion is based on skills, capabilities, qualities, and medical fitness.</p> <p>Job opportunities were communicated and given to surrounding villagers as first priority where no discrimination found observed during interview and related records of workers being employed. All workers have been treated equally in accordance with company regulations including the rights of workers as well. Compliance in accordance with national laws has been evaluated by the organization as described in criterion 2.1. The annual performance evaluation result of workers has shown.</p>	Complied

		<p>Sample has been taken during this audit:</p> <ul style="list-style-type: none"> <li>• Recruitment of employees in January 2023 on behalf Ulfa Febrianti for position Krani at Tungkal Ulu Estate. Requirements and the recruitment process has been carried out in accordance with procedures including a medical check as a requirement that must be met.</li> <li>• Recruitment of employees in January 2023 on behalf Angga Saputra for position Office Administration at Tungkal Ulu. Requirements and the recruitment process have been carried out in accordance with procedures.</li> <li>• Recruitment of employees in January 2023 on behalf Alberto Grasaly Demares for position mature upkeep at Tungkal Ulu. Requirements and the recruitment process has been carried out in accordance with procedures.</li> <li>• Promotion of PHL (non-permanent workers) to SKU (permanent workers) at Tungkal Ulu Estate in the 2023 period as many as 28 harvesters and in 2022 as many as 32 harvesters. Based on Memorandum from RH Plantation 3.</li> </ul> <p>Verified documents, namely:</p> <ol style="list-style-type: none"> <li>1. Personal Data Form of applicant, on behalf of Ulfa Febrianti, Angga Saputra and Alberto Grasaly Demares.</li> <li>2. Requirement sheet to be met, Cover Letter, ID Card, Family Card, Certificate etc.</li> <li>3. Results of Medical checkup conducted by Asian Agri Taman Raja Clinic on February 4, 2023, on behalf of: Ulfa Febrianti, Angga Saputra and Alberto Grasaly Demares.</li> </ol>	
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		<p>4. Freelance Daily Work Agreement Letter, for each worker, no. 001-004/PKHL/PTU-KLU/II/2023 dated February 9, 2023.</p> <p><b>Scheme Smallholder:</b>          Most of the smallholders manage their land independently. All workers are considered casual workers. Workers are hired based on verbal agreements relating to unit rates of work, payment systems, provision of work tools, etc. No work is done under a debt bond. Meanwhile, smallholders through KUD each have policies related to employment which are contained in the "Cooperative Policy" signed by the Cooperative Chair.</p> <p>Based on verification of sample documents and interview with several member of KUD Sari Bumi, KUD Karya Jaya, KUD Karya Kita and KUD Sawit Mulia, there was no forced or trafficked labor.</p>	
<p>3.5.2</p>	<p>Employment procedures are implemented and records are maintained.          - Minor compliance -</p>	<p>Procedures related to employment that have been established by the company are still being implemented/maintained and the records of implementation are maintained. Up to this surveillance there are no changes and are still consistently implemented by the company, including:</p> <ol style="list-style-type: none"> <li>1. Procedure: AA-HR-305.7-R0 dated 1 August 2021 – regarding Recruitment, Selection and Promotion for Non-Staff Workers. Explain that this procedure is a guide and provision related to the selection, acceptance and appointment of non-staff workers; non-staff workers are field workers with the PHL (Freelance Daily Worker) / PKWT (Specified Time Work Agreement), and PKWTT (permanent workers) which is also known as SKU</li> </ol> <p>This procedure has been well implemented by the company, please see verification in 3.5.1</p> <ol style="list-style-type: none"> <li>2. Memorandum from Medan Head Office Management September 1, 2020 No. 034/MB/MEMO/IX/20 concerning Guidelines for Recruitment and Appointment of Employees of PT IIS – Tungkal Ulu</li> </ol>	<p>Complied</p>

		<p>Group are still consistently implemented and used as guidelines for disruption of PKWT /PHL workers, including explaining the determination of the maximum period of PKWT/PHL for 3 (three) month taking into account the feasibility evaluation.</p> <p>3. Procedure No. AA-HR-308.5-R1 regarding submission and resolutions of employees complaint. Complaints can be submitted through representatives of the Workers' Union, or directly to their direct supervisor. Most employee complaints are complaints related to damage to infrastructure facilities (housing and others facilities) and the company has responded directly.</p> <p>4. Procedure No AA-FA-219.I-R5 regarding wages; the application of wages is in accordance with reference to the stipulation of the Governor of Jambi. Workers are transparently given pay slips so that they can find out the components of wages, including benefits, premiums, overtime and deductions. Please see the wage verification on 6.2.2</p>	
<p><b>Criteria 3.6:</b> An Occupational health and safety (H&amp;S) plan is documented, effectively communicated and implemented.</p>			
<p>3.6.1</p>	<p><b>(C)</b> All operational activities risks assessed to identify the H&amp;S issues. Mitigation plans and procedures are documented and implemented.          - Critical (Major) compliance -</p>	<p>PT Inti Indosawit Subur – Tungkal Ulu has a procedure to identify and prepare a risk assessment register (HIRAC). The procedure of HIRADC (Hazard identification and risk analysis and determining control) as a guidance and standard to conduct the hazard and risk assessment as well as the determining control for risk and hazard. Procedure presented in SOP "Identifikasi bahaya, Penilaian Resiko dan Penentuan Pengendalian" AA-SOP-HSE-03 R0 dated 20 May 2018.</p> <p>Risk assessment method used is quantitative and qualitative method which is the multiplication of severity with the level of possibility. The company has set matrix multiplication result, which is subsequently determined from the matrix level / quality risk is divided into five (5) categories: extreme, high, moderate, low and tolerance/permitted.</p>	<p>Complied</p>

		<p>Risk Assessment presented in document of HIRADC - last review on 19 January 2023 covering for all activities both in Tungkal Ulu POM and Estate, such as: boiler operation, sterilizer operation, generator set operation, loading ramp activity, cleaning of CPO storage tank, chemical mixing, fertilizer warehouse, herbicide, and pesticide sprayer, harvesting, road maintenance, HCV Monitoring, Boundary Monitoring, land application maintenance.</p> <p>Mitigation plan to eliminate the risk and control the risk has been determined in the HIRADC document.</p> <p>Mitigation plan to reduce and minimize the risk impact has been develop by company covering:</p> <ul style="list-style-type: none"> <li>• Elimination of risk. One of elimination risk is arrangement of FFB truck vehicles on loading ramp by installing barriers sign to maintain a safe distance between cars and workers.</li> <li>• Substitution of material and process.</li> <li>• Engineering control.</li> <li>• Administrative control. Administrative control was performed by employee mutation/rotation, sanction for safety rules violation. Safety inspection was performed regularly to ensure the compliance of safety regulation.</li> <li>• Personal protective equipment. Company has provided PPE for all workers according to the type of work and risk.</li> </ul> <p>PT Inti Indosawti Subur – Tungkal Ulu has prepared and documented the OHS Plan as in "Program Manajemen K3 Tahun 2023", such as:</p> <ul style="list-style-type: none"> <li>• Reducing the risk of work accidents: First aid training, basic safety training, basic fire training.</li> <li>• Arrangement of the Assignment of First Aid Officers to the Manpower Office.</li> <li>• Checking Apar, Hydrant, Evacuation Route, Assembly Point,</li> </ul>	
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		<p>Evacuation Controller Flag.</p> <ul style="list-style-type: none"> <li>• Carry out a "Drill" for handling land fires and assess the readiness and measure the effectiveness of the Emergency Response Team's work.</li> <li>• Safety induction and dissemination of SOP to new employees.</li> <li>• Safety briefing</li> <li>• PPE monitoring checklist</li> </ul> <p><b><u>Scheme Smallholder:</u></b></p> <p>During audit document HIRADC document for KUD Karya Jaya, KUD Sawit Mulia, KUD Sari Bumi, KUD Karya Kita were available and could be demonstrated as per "Pedoman Kesehatan dan Keselamatan Kerja" Tahun 2023, latest review in February 2023. Hazard Identification and Risk Assessment and Control (HIRAC) has covered for all activities in field, e.g: transport FFB, harvesting, manuring and spraying.</p> <p>Mitigation plan to eliminate or reduce the hazard and risk has been developed according to HIRAC as per "Pengendalian".</p> <p>An OHS plan year 2022 has prepared as per "Rencana K3 (Keselamatan dan Kesehatan Kerja) majority to provide and control use of PPE, warning/safety sign including socialization and monitoring, program such as:</p> <ul style="list-style-type: none"> <li>- PPE warning sign</li> <li>- Inspection and monitoring on using of PPE for harvester – daily</li> <li>- Training on pesticide application</li> <li>- Emergency response training</li> <li>- First aid training</li> <li>- Hazardous waste handling</li> </ul> <p>The implementation of risk analysis and risk control can be demonstrated during field audit such as: PPE provision for harvester (helmet, safety</p>	
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		boot, glasses and hand gloves, sickle cover), OHS awareness for harvester and smallholder member.	
3.6.2	<p><b>(C)</b> The effectiveness of the H&amp;S plan to address health and safety risks to people is monitored.</p> <p>- Critical (Major) compliance -</p>	<p>PT Inti Indosawit Subur – Tungkal Ulu and scheme smallholders has demonstrated the document of effectiveness of OHS program year 2023, such as:</p> <ul style="list-style-type: none"> <li>• Refreshment training related to OHS, dated 27 January 2023, consisted of: basic safety, job safety analysis, understanding MSDS; handling empty pesticide containers; emergency response plan (for accident and spillage/contamination); prohibit use of agrochemical for pregnant and breastfeeding female worker; prohibit spraying in HCV and water body.</li> <li>• Basic fire and fire drill dated 8<sup>th</sup> February 2023.</li> <li>• OHS safety meeting period January – May 2023, record of OHS meeting provided.</li> <li>• Report of OHS inspection (monthly) -&gt; inspection record January – May are available, last inspection was carried out on 6<sup>th</sup> May 2023.</li> <li>• Report of MCU for all workers in Tungkal Ulu Estate and POM was conducted by “Focus Clinical Laboratory”, dated 20 December 2022. The MCU was covered urine test, HSaAg and physical test.</li> <li>• Report of OHS inspection report, location in Tungkal Ulu period January – May 2023 – reported OK for PPE usage as per “Daftar Pemeriksaan APD Karyawan”, and OHS facilities (fire hydrant and fire extinguisher are well function)</li> <li>• Safety committee meeting, record of monthly safety committee meeting are available, sample seen for period January – May 2023. Report of P2K3 are submitted to Manpower office each quarter.</li> <li>• PPE provision for all workers at Tungkal Ulu Estate are demonstrated as per “<i>Bukti Serah Terima Alat Pelindung Diri</i>”. Sample seen:</li> </ul>	Complied

		<ul style="list-style-type: none"> <li>- Dated 3 January 2023 – PPE Apron, masker, handgloves for fertilizer workers (15 workers).</li> <li>- Dated 3 March 2023 – PPE Apron, Ap boots for spraying workers (13 workers).</li> <li>- Dated January 2023 - PPE safety shoes for Mill workers (88 workers – security, office, workshop, operator)</li> <li>- Dated March 2023 - PPE safety helmet for mill operator (12 workers/operator)</li> <li>- Dated March 2023 - PPE safety helmet for mill operator (14 workers/operator)</li> </ul> <p>Based on field visit during onsite audit for spraying workers and harvester workers, the risk impact probability was irritated and eyes disease, control by using appropriate PPE (eye wear/safety glasses, mask, and hand gloves) and regular training for sprayer workers.</p> <p>Discipline of PPE usage monitoring regularly conducted by Mill and Estate management to ensure all workers use the appropriate PPE during working. Monitoring record present in “Daftar Pemeriksaan APD Karyawan”. Sample seen for PPE monitoring of sprayer and fertilizer workers period January – May 2023.</p> <p>Based on interview with worker in pesticides application, method to minimizing risk and negative impact i.e: - Mixing of chemical conducted by trained person (Supervisor). There were aims to ensuring proper dosage, type of pesticide use. - Using of PPE while chemical mixing. Mixing of chemical located in mixing area, side by side with the chemical storage.</p> <p><b>Scheme Smallholder:</b>          Scheme smallholders has demonstrated the document of effectiveness of OHS program year 2023, such as:</p>	
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		<ul style="list-style-type: none"> <li>- Basic safety training: KUD Karya Jaya on 2 February 2023, KUD Sawit Mulia on 15 March 2023, KUD Sari Bumi on 22 February 2023, KUD Karya Kita on 17 January 2023</li> <li>- Basic fire training for all Scheme smallholder on 27 January 2023</li> <li>- PPE socialization: KUD Karya Jaya on 15 February 2023, KUD Sawit Mulia on 15 March 2023, KUD Sari Bumi on 22 February 2023</li> </ul> <p>Based on field visit to smallholder plots and interview with them, it was confirmed that they have aware regarding the risk for activity of harvesting and fertilizing in the field and the mitigation by PPE usage such as safety helmet and safety goggles for harvesting; masker and hand gloves for manuring. Safe working practices also implemented in the field. Monitoring of PPE usage and safe working practices also conducted by head of farmers group and supervisor from PT Inti Indosawit Subur.</p>	
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**Criteria 3.7:** All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.

3.7.1	<p><b>(C)</b> 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&amp;C Principles, in a form they understand and includes assessment of the training.</p> <p>- Critical (Major) compliance -</p>	<p>The company was able to demonstrate "Kalender Pelatihan Tahun 2023". It is a program for training of environment and sustainability in Asian Agri Learning Institute.</p> <table border="1" data-bbox="1093 935 1928 1375"> <thead> <tr> <th>Training Subject</th> <th>Operation Unit</th> <th>Attendance</th> <th>Schedule</th> </tr> </thead> <tbody> <tr> <td>Sustainability Awareness</td> <td>Tungkal Ulu Estate and Tungkal Ulu Plasma</td> <td>Staff and Non Staff</td> <td>June 2023</td> </tr> <tr> <td>Traceability and Mass Balance</td> <td>Tungkal Ulu Estate and Tungkal Ulu Plasma</td> <td>Staff and Non Staff</td> <td>June 2023</td> </tr> <tr> <td>HCV Awareness</td> <td>Tungkal Ulu Estate and Tungkal Ulu Plasma</td> <td>Staff and Non Staff</td> <td>January 2023</td> </tr> <tr> <td>Basic Fire</td> <td>Tungkal Ulu Estate and Tungkal Ulu Plasma</td> <td>Staff and Non Staff</td> <td>January 2023</td> </tr> </tbody> </table>	Training Subject	Operation Unit	Attendance	Schedule	Sustainability Awareness	Tungkal Ulu Estate and Tungkal Ulu Plasma	Staff and Non Staff	June 2023	Traceability and Mass Balance	Tungkal Ulu Estate and Tungkal Ulu Plasma	Staff and Non Staff	June 2023	HCV Awareness	Tungkal Ulu Estate and Tungkal Ulu Plasma	Staff and Non Staff	January 2023	Basic Fire	Tungkal Ulu Estate and Tungkal Ulu Plasma	Staff and Non Staff	January 2023	Complied
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		<p>Work Accident reporting and investigation</p>	<p>Tungkal Ulu Estate and Tungkal Ulu Plasma</p>	<p>Staff and Non Staff</p>	<p>January 2023</p>	
<p>3.7.2</p>	<p>Records of training are maintained, where appropriate on an individual basis.          - Minor compliance -</p>	<p><b>Scheme smallholder:</b>          Plasma Tungkal Ulu has established Training Program for KUD, Kelompok Tani and farmer member FY2023, the training consists of:</p> <ol style="list-style-type: none"> <li>1. Training on RSPO in January and March 2023</li> <li>2. Basic Safety Training in January &amp; February 2023</li> <li>3. Harvest and cut fruit training on March 2023</li> <li>4. Fertilizing Training on March 2023</li> <li>5. Integrated Pest Control Training in February and March 2023</li> <li>6. HCV training on May 2023</li> </ol>				<p>Complied</p>
		<p>Record of training are available, such as training attendant list, as sample described below:</p> <ol style="list-style-type: none"> <li>1. Basic safety, job safety analysis training on 27 January 2023 attends by 30 participants.</li> <li>2. Sustainability awareness on 19 May 2023 attend by 36 participants.</li> <li>3. Basic Fire training and fire drill on 27 January 2023, attend by 27 participants.</li> <li>4. HCV Awareness on 27 January 2023 attend by 30 participants.</li> <li>5. Inspection, Work environment observation and Industry hygiene, on 27 January 2023 attend by 30 participants.</li> <li>6. Traceability and mass balance training on 17/06/2023, attend by 8 participants from mill personnel.</li> </ol> <p>Record of training for personal employee also available in employee</p>				

		<p>personal file history.</p> <p><b>Scheme smallholder:</b>  Record of training are available, such as training attendant list, as sample described below:</p> <ul style="list-style-type: none"> <li>- Basic safety training: KUD Karya Jaya on 2 February 2023, KUD Sawit Mulia on 15 March 2023, KUD Sari Bumi on 22 February 2023, KUD Karya Kita on 17 January 2023</li> <li>- Basic fire training for all Scheme smallholder on 27 January 2023</li> <li>- Replanting training: KUD Karya Jaya on 16/01/2020, KUD Sawit Mulia on 06/02/2023, KUD Sari Bumi on 16/03/2023, KUD Karya Kita on 08/03/2023</li> <li>- Oil palm Pest and Disease training: KUD Karya Jaya on 20/03/2023, KUD Sawit Mulia on 06/02/2023, KUD Sari Bumi on 16/03/2023, KUD Karya Kita on 08/03/2023</li> <li>- Fertilizing training: KUD Karya Jaya on 20/03/2023, KUD Sawit Mulia on 06/02/2023, KUD Sari Bumi on 16/03/2023, KUD Karya Kita on 08/03/2023</li> <li>- HCV training: KUD Karya Jaya on 11/05/2022, KUD Sawit Mulia on 08/07/2022, KUD Sari Bumi on 05/08/2022, KUD Karya Kita on 09/05/2023</li> <li>- RSPO training: KUD Karya Jaya on 09/01/2023, KUD Sawit Mulia on 08/07/2022, KUD Sari Bumi on 05/08/2022, KUD Karya Kita on 14/03/2023</li> </ul>	
<p>3.7.3</p>	<p>Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.</p> <p>- Minor compliance -</p>	<p>Training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Latest training for RSPO SCCS concerning Traceability has been conducted on 17/06/2023. Training attend by Mill manager, KTU (head of administration), production clerk, internal audit, Weighbridge clerk,</p>	<p>Complied</p>

		security, dispatch operator. Evidence of training are available (attendance list, training material).	
<p><b>Criteria 3.8:</b> Supply chain requirements for mills.</p> <p>Procedure note: all requirements are classified as Critical Indicators. However it will not contribute to suspension if there is more than 5 non-compliance within a principle)</p>			
3.8.1	<p><b>Identity Preserved Module</b></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&amp;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>In this audit there is no change in the supply chain module for Tungkal Ulu POM. PT. Inti Indosawit Subur – Tungkal Ulu POM uses Mass Balance supply chain model. The mill only claimed the FFB proportion from certified supply bases which comprise of company-own estate (Tungkal ulu Estate) and 10 scheme Smallholder (cooperative/Koperasi Unit Desa - KUD).</p>	Not Applicable
3.8.2	<p><b>Mass Balance Module</b></p> <p>A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	<p>PT. Inti Indosawit Subur – Tungkal Ulu POM holds current RSPO P&amp;C Certificate No. RSPO 594422, first certification starts on 15 August 2012, latest revision date 06 May 2023 and expired on 14 August 2027. In the current certificate, PT. Inti Indosawit Subur – Tungkal Ulu POM uses Mass Balance supply chain model. The mill only claimed the FFB proportion from certified supply bases which comprise of company-own estate (Tungkal ulu Estate) and 10 scheme Smallholder in form of cooperative/Koperasi Unit Desa (KUD). The proportion of non-certified FFB comes from third-party supplier, comprise of: HD, KSP, KUD Bina Usaha, Victory, YES, Gapoktan Maju Jaya, Merlung Topaz, Penyabungan Topaz, MH, Novie Zulhi, KT Dicky, Plasma Non Certified.</p>	Complied
3.8.3	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&amp;C certification report. This figure represents the total volume of certified oil palm product (CPO</p>	<p>The estimated tonnage of certified CPO and PK that could potentially produce by PT. Inti Indosawit Subur – Tungkal Ulu POM it recorded in RSPO Public Summary report, certificate and RSPO IT Paltform.</p>	Complied

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	<p>and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p>	<p>The mill has met registration and reporting requirement as it registered in RSPO IT Platform (PalmTrace) with ID number RSPO_PO1000000345.</p> <p>Below is the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year 2022/2023:</p> <p><u>Forecast volume (Aug 2022 – July 2023)</u>  FFB: 109,403 MT  CPO: 23,913 MT (OER: 21.86%)  PK: 5,744 (KER: 5.25%)</p> <p><u>Actual production volume (Aug 2022 – ytd May 2023)</u>  FFB: 95,871.41 MT  CPO: 13,847.98 MT  PK: 3,276.89 MT</p> <p><u>Actual sold volume (Aug 2022 – ytd May 2023)</u>  CPO: 12,199.26 MT (sold as ISCC certified)  PK: 3,276.94 MT</p>	
<p>3.8.4</p>	<p>The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.</p>	<p>PT. Inti Indosawit Subur – Tungkal Ulu POM is subsidiary of PT. Inti Indosawit Subur, a member of RSPO, with RSPO membership No.1-0022-06-000-00 since 6 February 2006.</p> <p>PT Inti Indosawit Subur – Tungkal Ulu POM has meet all registration and reporting requirements.</p> <p>RSPO IT Platform/PalmTrace account RSPO_PO1000000345.</p>	<p>Complied</p>
<p>3.8.5</p>	<p>Documented procedures  The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p>	<p>During this audit, there is no changing in the procedure of supply chain. PT. Inti Indosawit Subur – Tungkal Ulu POM can demonstrate procedures as follow:</p> <ul style="list-style-type: none"> <li>Standard Operating Procedures – Traceability (AA-MPM-OP-1400.17.R7) dated 1 October 2019. The procedures cover traceability of CPO and PK, since FFB receiving from Tungkal Ulu Estate and Smallholder, processing up to shipping of CPO and PK as</li> </ul>	<p>Complied</p>

	<p>a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</p> <p>b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</p> <p>c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill's procedures for the implementation of this standard.</p> <p>d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBS including ensuring no contamination in the IP mill.</p>	<p>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.</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• SOP for mill operation Mill Policy Manual:             <ul style="list-style-type: none"> <li>- SOP AA-MPM-OP-1400.02.R2 Stasiun Penerimaan for FFB receiving station;</li> <li>- SOP AA-SOP-OP-101.5-R0 Grading;</li> <li>- SOP AA-MPM-OP-1400.03.R1 Stasiun Rebusan for sterilizer;</li> <li>- SOP AA-MPM-OP-1400.04.R1 Stasiun Pemisahan Berondolan for loose fruit separation;</li> <li>- SOP AA-MPM-OP-1400.05-R1 Stasiun Pengadukan dan Pengempaan for pressing station;</li> <li>- SOP AA-MPM-OP-1400.06-R1 Stasiun Pemurnian for clarification;</li> <li>- SOP AA-MPM-OP-1400.07-R1 Stasiun Pemisahan Nut dan Fiber for nut and fiber separation;</li> <li>- SOP AA-MPM-OP-1400.08-R1 Stasiun Kernel for kernel station;</li> <li>- SOP AA-MPM-OP-1400.09-R1 Stasiun Boiler;</li> <li>- SOP AA-MPM-OP-1400.10-R1 Stasiun Engine Room;</li> <li>- SOP AA-MPM-OP-1400.11-R1 Stasiun Water Treatment;</li> <li>- SOP AA-MPM-OP-1400.12-R1 Laboratorium;</li> <li>- SOP AA-MPM-OP-1400.13-R1 Stasiun Pengelolaan Limbah for palm oil mill effluent treatment;</li> </ul> </li> </ul>	
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		<ul style="list-style-type: none"> <li>- SOP AA-MPM-OP-1400.14-R2 Stasiun Penimbunan dan Pengiriman CPO dan Kernel for CPO and PK bulking and despatch operation;</li> <li>- SOP AA-MPM-OP-1400.15-R1 Perawatan for preventive maintenance;</li> <li>- SOP AA-MPM-OP-1400.18-R4 Book Keeping</li> <li>- AA-MPM-OP-1400.17-R7 Traceability</li> </ul>	
3.8.6	<p>Internal Audit</p> <p>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill;</p> <p>a) Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>b) Effectively implements and maintains the standard requirements within its organisation.</p> <p>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p>	<p>During this audit there is no changing in the procedure of internal audit. PT. Inti Indosawit Subur – Tungkal Ulu POM has a procedure to conduct internal audit RSPO, including RSPO SCCS as per Procedure of "AA-SOP-ES-6001-R5 dated 1 August 2020". According to internal audit procedure, internal audit conducted once a year considering the critical area.</p> <p>The latest internal audit conducted on 23 – 28 January 2023 by Mr. Hendrik Simanjuntak (lead auditor) and Ian Septian Arifin.</p> <p>Internal audit report was evident, all issue raised during internal audit has been followed up by Corrective Action and Closed. Sample seen on internal audit issue: management review record were not available - follow up action taken by kept the record of management review; Shipping announcement were not available – follow up by announce the transaction on PalmTrace. Evidence of follow up action was sighted during audit. Internal audit record and report were well maintained by administration staff (KTU) and sustainability officer.</p> <p>Management review conducted once a year as per "Standard Operating Procedures for Internal Audit and Management Review (AA-SOP-ES-6001-R4)". Latest management review conducted on 2 February 2023. Minutes of management review and attendance list for management review are available.</p>	Complied
3.8.7	<p>Purchasing and Goods In</p> <p>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBS received.</p>	<p>PT Inti Indosawit Subur – Tungkal Ulu POM has demonstrated SOP of Traceability (AA-MPM-OP-1400.7.R7), chapter 5.1 indicates the Weighbridge Clerk has responsibility to input data and print weighbridge card based on "Surat Pengantar TBS", covering information e.g. estate</p>	Complied

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	<p>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>	<p>name and block number, mill name, date of delivery, product description and quantity, RSPO certificate number, transporter identity and unique identification number.</p> <p>PT. Inti Indosawit Subur – Tungkal Ulu POM receive FFB from certified and non-certified source. Certified source consist of own estate (Tungkal Ulu Estate) and Scheme Smallholder (Tungkal Ulu Plasma). Non-certified FFB sourced 2022/2023 from third party supplier, e.g.: YES, KSP, HD, KUD Bina Usaha SP1, Victory, Teguh Prayoga, Jaya Mandiri, Merlung Topaz, MH, Gapoktan Maju Jaya, Penyabungan Topaz, Gapoktan Usaha Berkat, and Novie Zulhi.</p> <p>Document "Surat Pengantar TBS" (FFB Delivery Note) and Kartu Timbangan (Weighbridge Ticket) described identity and location of FFB source and other item required e.g: FFB Net weight, number of bunches, transport vehicle number, driver, RSPO certificate number.</p> <p>Sample documents of FFB delivery note and Weighbridge ticket from certified and non-certified source were available and the information contain is accurate and complete. Sample seen for certified FFB received:</p> <ul style="list-style-type: none"> <li>- Surat Pengantar TBS No. KTUDT722423619105301, dated 19/06/2023, Driver: Suprianta Sitepu, Vehicle number: BM9416GU, FFB amount: 822 bunches, origin: Tungkal Ulu Estate, Afdeling 2 Block B19C, B19d and B19i.</li> <li>- Weighbridge Ticket No. PTUA123104768; dated 19/06/2023; FFB origin: Tungkal Ulu Estate, Afdeling 2; ID: KTU-2; Net weight: 6,230 kg; Driver Suprianta Sitepu, Vehicle number: BM9416GU, FFB amount: 822 bunches; RSPO certificate number: RSPO 594422.</li> <li>- Surat Pengantar TBS No. KTUDT73420230619134801, dated 19/06/2023, Driver: M. Yunus Nasution, Vehicle number: BM9382KK, FFB amount: 550 bunches, origin: Tungkal Ulu Estate, Afdeling 3 Block C181, C18b, C18d.</li> <li>- Weighbridge Ticket No. PTUA123104772; dated 19/06/2023; FFB origin: Tungkal Ulu Estate, Afdeling 3; ID: KTU-3; Net weight: 4,850 kg; Driver</li> </ul>	
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		<p>M. Yunus Nasution, Vehicle number: BM9382KK, FFB amount: 550 bunches; RSPO certificate number: RSPO 594422.</p> <ul style="list-style-type: none"> <li>- Surat Pengantar TBS No. 0001/PTU, dated 19/06/2023, Driver: Sri Sudono, Vehicle number: BM8655SP, FFB amount: 2,532 bunches, origin: Tungkal Ulu Plasma, Block B20b.</li> <li>- Weighbridge Ticket No. PTUA123104766; dated 19/06/2023; FFB origin: Tungkal Ulu Plasma, ID: KVT-4; Net weight: 6,816 kg; Sri Sudono, Vehicle number: BM8655SP, FFB amount: 2,532 bunches; RSPO certificate number: RSPO 594422.</li> </ul> <p>Sample seen for non-certified FFB received:</p> <ul style="list-style-type: none"> <li>- Surat Pengantar TBS No. 0002202, dated 19/06/2023, Driver: Hery, Vehicle number: BM8077DI, FFB amount: 540 bunches, origin: HD.</li> <li>- Weighbridge Ticket No. PTUA523109479; dated 19/06/2023; FFB origin: HD; ID: A175; Net weight: 7,554 kg; Driver: Hery, Vehicle number: BM8077DI, FFB amount: 540 bunches; Non-Certified.</li> <li>- Surat Pengantar TBS No. 01329, dated 19/06/2023, Driver: Tedi, Vehicle number: BM8780MW, FFB amount: 444 bunches, origin: KUD Bina Usaha-SP1.</li> <li>- Weighbridge Ticket No. PTUA523109481; dated 19/06/2023; FFB origin: KUD Bina Usaha-SP1; ID: A172; Net weight: 6,213 kg; Driver: Tedi, Vehicle number: BM8780MW, FFB amount: 444 bunches; Non-Certified.</li> </ul> <p>According to SOP of Traceability (AA-MPM-OP-1400.7.R7), Mill will inform the CB if there is a projected overproduction of certified tonnage. However, until the audit conducted there is no overproduction.</p> <p>Mechanism for handling non-conforming FFB and/or documents are described in SOP of Traceability (AA-MPM-OP-1400.7.R7), until the audit conducted there is no non-conforming FFB and/or documents.</p>	
3.8.8	Sales and Goods Out	PT Inti Indosawit Subur – Tungkal Ulu POM shows SOP Traceability (AA-MPM-OP-1400.7.R7), section 6.2 indicating the Marketing manager	Complied

	<p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ul style="list-style-type: none"> <li>a) The name and address of the buyer;</li> <li>b) The name and address of the seller;</li> <li>c) The loading or shipment / delivery date;</li> <li>d) The date on which the documents were issued;</li> <li>e) RSPO certificate number;</li> <li>f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations);</li> <li>g) The quantity of the products delivered;</li> <li>h) Any related transport documentation;</li> <li>i) A unique identification number.</li> </ul>	<p>creates Sales Contract and Delivery Order (DO) with information: name and address of production unit; name and address of buyer; contract number; type of product; transportation (air, land, sea); type of product CPO/PK certified or non-certified; quantity of product sold, CPO/PK certified or non-certified in MT; date of shipping; product quality specification CPO/PK (FFA, water content, dirt content); and Supply chain model (Mass Balance).</p> <p>At Mill site, weighbridge operator will printed out CPO/PK weighbridge card, based on DO from marketing indicating: Type of commodity, CPO certified or non-certified; country of origin: Indonesia; Supply Chain model: (Mass Balance); Certificate number of the mill; date of delivery, Product quality specification (moisture, FFA, dirt); Contract number/DO number; Quantity, Transport detail (driver name, vehicle number); and Buyer address.</p> <p>Sales Contract and Delivery Order indicates name and address of seller, name and address of buyer, loading date, supply chain certificate number and unique identification number.</p> <p>However, since latest licence PalmTrace activated until this audit conducted there is no sold of CPO certified as RSPO. All CPO sold as ISCC Certified.</p> <p>CSPK production by Tungkal Ulu POM was sold/deliver to Tungkal Ulu KCP whereby under PT IIS – Tungkal Ulu POM. The delivery of CSPK to Tungkal Ulu KCP record in delivery form indicates the name and address of seller, name and address of buyer, loading date, supply chain certificate number and unique identification number, nett weight.</p> <p>Sample seen for CSPK delivery form:</p> <ul style="list-style-type: none"> <li>- Delivery Form #KCP PTU 1004 SS dated 4 April 2023; from PT Inti Indosawit Subur – Tungkal Ulu POM to PT Inti Indosawit Subur – Tungkal Ulu KCP; quantity is 856,170 kg; Supply Chain model is Mass Balance; Palm Oil Mill’s RSPO certificate number is RSPO 594422.</li> </ul>	
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		<ul style="list-style-type: none"> <li>- Delivery Form #KCP PTU 1004 SS dated 1 May 2023; from PT Inti Indosawit Subur – Tungkal Ulu POM to PT Inti Indosawit Subur – Tungkal Ulu KCP; quantity is 1,457,720 kg; Supply Chain model is Mass Balance; Palm Oil Mill’s RSPO certificate number is RSPO 594422.</li> </ul>	
<p>3.8.9</p>	<p><b>Outsourcing Activities</b></p> <p>i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification.</p> <p>ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</p>	<p>PT. Inti Indosawit Subur – Tungkal Ulu POM operate subcontractor for CPO and PK transporter. The appointed outsourced company is PT. Trans Jaya Pertama and PT Sumber Kencana.</p> <p>PT IIS Tungkal Ulu has a procedure to control the outsourced transporter through “SOP Traceability AA-MPM-OP-1400.17-R7 dated 1 October 2019”</p> <p>Internal control for CPO and PK delivery by contractor has made as well by:</p> <ul style="list-style-type: none"> <li>✓ 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\</li> <li>✓ Delivery Order Slip from Transporter, contain information of sales contract number, Truck number, destination, driver name, port destination.</li> <li>✓ Shipping Readiness Chekclist/Daftar Periksa Kesiapan Pengiriman CPO/Kernel contain information of Truck number, driver name, date of inspection, item inspection including driver identity and completeness of vehicle legality, completeness of physical standard of vehicle, number of segel.</li> </ul> <p>During field visit to Tungkal Ulu Palm Oil Mill during CPO loading at dispatch CPO, confirmed that control for CPO delivery by contractor are well implemented. However, there is no CPO certified RSPO was deliver, all CPO sold as ISCC and non-certified.</p> <p>There is no PK delivery outside the mill, CSPK was deliver to KCP Tungkal Ulu which is under PT Inti Indosawit Subur – Tungkall Ulu POM.</p>	<p>Complied</p>

<p>3.8.10</p>	<p>The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.</p>	<p>PT Inti Indosawit Subur - Tungal Ulu POM has recorded name and contact detail of all contractors, as follows:</p> <table border="1" data-bbox="1093 400 1850 644"> <tr> <td>Name of Transporter</td> <td>PT Trans Jaya Pertama</td> <td>PT Sumber Kencana</td> </tr> <tr> <td>Address</td> <td>Medan/Belawan, Sumatera Utara</td> <td>Jalan Veteran No. 77, Rengat</td> </tr> <tr> <td>Contact Person</td> <td>Erna Dharmadi</td> <td>Djohor Djudin</td> </tr> <tr> <td>Telephone</td> <td>0812 606***</td> <td>0812***</td> </tr> </table>	Name of Transporter	PT Trans Jaya Pertama	PT Sumber Kencana	Address	Medan/Belawan, Sumatera Utara	Jalan Veteran No. 77, Rengat	Contact Person	Erna Dharmadi	Djohor Djudin	Telephone	0812 606***	0812***	<p>Complied</p>
Name of Transporter	PT Trans Jaya Pertama	PT Sumber Kencana													
Address	Medan/Belawan, Sumatera Utara	Jalan Veteran No. 77, Rengat													
Contact Person	Erna Dharmadi	Djohor Djudin													
Telephone	0812 606***	0812***													
<p>3.8.11</p>	<p>The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.</p>	<p>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". PT Inti Indosawit Subur – Tungal Ulu POM are aware to inform its CB regarding the name and contact detail of any new contractor prior to next assessment. Certificate holder informed the CB through pre information audit checklist by Stakeholder Relation Officer – Jakarta Office.</p>	<p>Complied</p>												
<p>3.8.12</p>	<p>Record keeping</p> <ul style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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.</li> <li>iv) For Mass Balance Module, the mill:</li> </ul>	<p>The organization has continued to maintain 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"> <li>- FFB delivery note</li> <li>- Weighbridge ticket for FFB receiving, CPO and PK delivery</li> <li>- Delivery Order</li> <li>- Sales contract</li> <li>- Shipping Announcement</li> <li>- Mass balance report</li> <li>- Internal audit RSPO SCCS and Management review</li> </ul>	<p>Complied</p>												

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	<p>a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</p> <p>b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock).</p>	<p>The procedure of Traceability (AA-MPM-OP-1400.7.R7), requires that all records and reports related to traceability and book keeping are retained for a period of 10 years.</p> <p>All receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK are record and balance in a three-monthly basis, as evidence in "Mass Balance Report Tungkal Ulu POM" period 2022: January – March, April – June, July – September, October – December and period 2023: January – March, April – June, July – ytd August.</p> <p>All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios/actual production of CPO and PK.</p> <p>According to Mass balance Report, Tungkal Ulu POM only deliver Mass Balance sales from a positive stock. No oversold of certified product compared to CPO and PK production actual.</p>	
3.8.13	<p><b>Extraction Rate</b></p> <p>The oil extraction rate (OER) and the kernel extraction rate(KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	<p>The organization is able to be provided estimate volume of CPO and PK in a year period as in Budget FY2022/2023 Production FFB, CPO and PK. The organization also keep an up-to-date record of the FFB volume received, CPO and PK produced over a period of twelve (12) month, as in Rekapitulasi Produksi TBS, CPO dan PK PT Inti Indosawit Subur – Tungkal Ulu POM.</p> <p>OER and KER are estimated based on associated inputs and upon past experience (previous year FFB, CPO and PK production). According to production report Tungkal Ulu POM, actual OER 2022 was 20.68% and KER was 5.28%</p> <p>The site has set OER for budget 2023 as 20.66% and KER as 5.35%; actual OER ytd May 2023 was 20.44% and KER was 5.33%.</p>	Complied
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	<p>The actual conversion ratio is monitored on daily basis through sounding result and documented in daily report. PT. Inti Indosawit Subur – Tungkal Ulu POM is able to demonstrate the work instruction for analysis of oil content.</p>	Complied

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		<p>Based on Laporan Harian Produksi dated 30 May 2023, the sounding result and production report shows that actual conversion ratios from FFB into CPO are:</p> <ul style="list-style-type: none"> <li>a. For FFB from Tungkal Ulu Estate: 23.13%</li> <li>b. For FFB from Tungkal Ulu Plasma: 19.33%</li> <li>c. For FFB from third-party: 19.63%</li> <li>d. Average OER 20.45%</li> </ul> <p>And actual conversion ratios from FFB into PK are:</p> <ul style="list-style-type: none"> <li>a. For FFB from Tungkal Ulu Estate: 5.38%</li> <li>b. For FFB from Tungkal Ulu Plasma: 5.38%</li> <li>c. For FFB from third-party: 5.38%</li> <li>d. Average KER 5.38%</li> </ul> <p>Budget vs Actual conversion ratios year 2022 from FFB into CPO are:</p> <ul style="list-style-type: none"> <li>a. For FFB from Tungkal Ulu Estate: budget 22.30%, actual 23.25%</li> <li>b. For FFB from Tungkal Ulu Plasma: budget 20.75%, actual 20.69%</li> <li>c. For FFB from third-party: budget 19.05%, actual 19.82%</li> </ul>	
3.8.15	<p>Processing</p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	<p>PT. Inti Indosawit Subur – Tungkal Ulu POM uses Mass Balance supply chain model. The mill only claimed the FFB proportion from certified supply bases which comprise of company-own estate (Tungkal ulu Estate) and 10 scheme Smallholder in form of cooperative/Koperasi Unit Desa (KUD).</p>	Complied
3.8.16	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months</p>	<p>PT. Inti Indosawit subur – Tungkal Ulu POM has made shipping announcement inside PalmTrace transaction, sample seen for period August 2022 – May 2023:</p>	Complied



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	<p>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>	<table border="1"> <thead> <tr> <th>Transaction ID</th> <th>Buyer</th> <th>Product</th> <th>Supply Chain Model</th> <th>Volume (MT)</th> <th>Status</th> </tr> </thead> <tbody> <tr> <td>TR-94edaafc-7684</td> <td>Tungkal Ulu KCP</td> <td>CSPK</td> <td>MB</td> <td>1,018.75</td> <td>Confirmed</td> </tr> <tr> <td>TR-a1097bb1-b7f2</td> <td>Tungkal Ulu KCP</td> <td>CSPK</td> <td>MB</td> <td>1,282.32</td> <td>Confirmed</td> </tr> <tr> <td>TR-d6433b22-206e</td> <td>Tungkal Ulu KCP</td> <td>CSPK</td> <td>MB</td> <td>975.87</td> <td>Confirmed</td> </tr> </tbody> </table> <p>PT. Inti Indosawit Subur – Tungkal Ulu POM made remove RSPO certified CSPO from their PalmTrace account:  Transaction ID: ST-TR-641a81a6-94e1 for removed 12,199.26 MT CSPO from certified stock, dated 21/08/2023; Stock removed for CSPO sold as ISCC certified.</p>	Transaction ID	Buyer	Product	Supply Chain Model	Volume (MT)	Status	TR-94edaafc-7684	Tungkal Ulu KCP	CSPK	MB	1,018.75	Confirmed	TR-a1097bb1-b7f2	Tungkal Ulu KCP	CSPK	MB	1,282.32	Confirmed	TR-d6433b22-206e	Tungkal Ulu KCP	CSPK	MB	975.87	Confirmed	
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TR-d6433b22-206e	Tungkal Ulu KCP	CSPK	MB	975.87	Confirmed																						
<p>3.8.17</p>	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	<p>PT. Inti Indosawit Subur – Tungkal Ulu POM has made off product claims regarding the support of RSPO certified oil palm products. The organization aware about the RSPO Rules on Market Communications and Claims.</p>	<p>Complied</p>																								
<p><b>General corporate communications</b></p>																											
<p>4.1</p>	<p>A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.</p>	<p>PT. Inti Indosawit Subur (with the brand Asian Agri), the parent company of Tungkal Ulu POM is highlighting its commitment to the principles of RSPO, and directly referring to RSPO website. The corporate communication can be found at <a href="http://www.asianagri.com">http://www.asianagri.com</a>.</p>	<p>Complied</p>																								
<p>4.2</p>	<p>In corporate communications a member is allowed to:</p> <ul style="list-style-type: none"> <li>• Display its RSPO membership status</li> <li>• Display the RSPO web address (<a href="http://www.rspo.org">www.rspo.org</a>)</li> <li>• State that the member supports the work of the RSPO</li> <li>• State the member's history with regard to the RSPO.</li> <li>• Use the RSPO trademark to promote its membership of the RSPO.</li> </ul>	<p>PT. Inti Indosawit Subur (with the brand Asian Agri), in its website:</p> <p>a. Display its RSPO membership status: No, PT. Inti Indosawit Subur (with the brand Asian Agri), did not display its RSPO membership status. The CH only stated "In 2006, became a member of the Roundtable of Sustainable Palm Oil. We received our first RSPO certification for our estate in 2010."</p>	<p>Complied</p>																								

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	<p>Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at <a href="http://www.rspo.org">www.rspo.org</a>' where the link must lead to the member's profile page.</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, 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>	
<p>4.3</p>	<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>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>	<p>Complied</p>
<p>4.4</p>	<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>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>	<p>Complied</p>

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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.	PT. Inti Indosawit Subur (with the brand Asian Agri), did not display any RSPO Logo.	Complied
<b>Business to business communications</b>			
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 – Tungkal Ulu POM and their buyers.	Complied
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating 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 – Tungkal Ulu POM followed the requirements of the RSPO SCCS. PT. Inti Indosawit Subur – Tungkal Ulu POM stating the supply chain model and certificate number under which the claim is being made.	Complied
5.3	<p>Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options:</p> <p>a) If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer’s SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.</p> <p>b) If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p>	<p>PT. Inti Indosawit Subur – Tungkal Ulu POM is not a distributor and/or wholesaler.</p> <p>Not applicable.</p>	Not Applicable
5.4	A certified member can provide information to its customers detailing the presence of certified palm oil contained within a product even if it is not eligible for a product-specific under RSPO rules. The end product	<p>PT. Inti Indosawit Subur – Tungkal Ulu POM is not producing or selling end-product to consumer. No labelling on product whatsoever.</p> <p>Not applicable.</p>	Complied

	<p>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>		
<b>MODULE B – MASS BALANCE SPECIFIC RULES</b>			
<b>Minimum Mass Balance content</b>			
	<p>95% or above of the oil palm content must be RSPO MB-certified.</p>	<p>PT Inti Indosawit Subur – Tungkal Ulu POM is producing and selling CSPO and CSPK; All CSPO/CSPK sold are 100 % content oil palm RSPO MB-certified.</p>	<p>Complied</p>
	<p>Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.</p>	<p>There is percentage of non-certified oil palm within the product CSPO/CSPK.</p> <p>PT Inti Indosawit Subur – Tungkal Ulu POM does not produce end consumer goods. The production are CPO and PK.</p>	<p>Complied</p>
<b>Labelling and trademark (MB)</b>			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> <li>• Surrounded by the text: 'Certified sustainable palm oil'.</li> <li>• The RSPO label MUST contain the tag 'MIXED'. The tag MIXED designates oil palm products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag 'MIXED' on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim.</li> </ul>	<p>PT Inti Indosawit Subur – Tungkal Ulu POM was not use the RSPO label or logo.</p>	<p>Complied</p>

	<ul style="list-style-type: none"> <li>• The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'.</li> <li>• 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).</li> <li>• 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 &amp; Claims document.</li> </ul>		
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**Messaging (MB)**

	<p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <ul style="list-style-type: none"> <li>• [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.</li> <li>• 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.</li> </ul> <p>In off-product communications, reference to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown in company records is allowed.</p> <p>Messaging NOT ALLOWED in storytelling in product-related communications:</p> <ul style="list-style-type: none"> <li>• Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product.</li> </ul>	<p>PT Inti Indosawit Subur – Tungkal Ulu POM was not messaging in storytelling in product-related communications. It was verified during audit through sales contract, DO and dispatch slip (weighbridge card).</p>	<p>Complied</p>
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**Principle 4: Respect community and human rights and deliver benefit**

Respect community rights, provide equal opportunities, maximise benefits from engagement and ensure remediation where needed.			
<b>Criteria 4.1:</b> The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.			
4.1.1	<p><b>(C)</b> 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>- Critical (Major) compliance -</p>	<p>There are no changes related to human rights policies that have been approved by the President Director, Mr. Kevin Tio on December 1 2019 in Medan which was approved by the Main Director (Kevin Tio).</p> <p>Policies relating to human rights, explained in the Company Policy in point 13, which states that: "<i>The company respects human rights by treating all employees fairly, both in terms of acceptance, assessment, working conditions and environment, as well as representation without distinction of ethnicity</i>", caste, national origin, religion/belief, disability, gender, sexual orientation, trade union policy discount and/or age".</p> <p>Company policies are also published in the form of posters at strategic places in the Tungkal Ulu Estate and Mill.</p> <p>Separately, the company also has policies related to human rights defenders, which are contained in the Internal Memorandum No. 049/HO/MEMO/INT/03/20 from Head Operational dated 20 March 2020: "Protection of reporters/defenders of human rights defenders from acts of revenge, intimidation, and hatred".</p> <p>The socialization in 2023 has performed on 21-22 February 2023 attended by 29 participants from Mill and on 25-27 January 2023 which attended by 34 participants from Tungkal Ulu Estate and also dissemination to contractor and supplier on 22 May 2023 attended by 7 contractors and supplier and socialization was conducted on 10 March 2023 attended by 14 contractors and supplier as well.</p> <p><b>Scheme smallholders:</b></p> <p>The policy regarding Human Rights at the Tungkal Ulu Plasma Cooperative, since its stipulation in 2021 by each cooperative, until this</p>	Complied

		<p>audit surveillance has not changed, where related to human rights is stated in point 9, i.e:</p> <p><i>"KUD Menghormati hak azasi manusia dengan melakukan seluruh karyawan KUD maupun petani secara adil, abik dalam penerimaan, penilaian, kondisi dan lingkungan kerja serta keterwakilan tanpa mamandang suku, kasta, asal negara, agama/kepercayaan, cacat gender, orientasi seksual, keanggotaan serikat pekerja, afiliasi politik dan/atau umur"</i>.</p> <p>This policy has been socialized again to all members and administrators of each cooperative, for example:</p> <ol style="list-style-type: none"> <li>1. In KUD Sari Bumi socialized was performed on 14-16 March 2023, attended by 27 participants.</li> <li>2. In KUD Karya Jaya, socialized was performed on 23-24 January 2023, attended by 23 participants.</li> <li>3. In KUD Sawit Mulia socialized was performed on 7-9 February 2023, attended by 31 participants.</li> <li>4. In KUD Karya Kita socialized was performed on 8-9 March 2023, attended by 41 participants.</li> </ol> <p>Based on interviews with sample farmers in this surveillance audit (e.g: Mr. Jumari, Mr. Sularno, Mr. Wito and Mr. Slamet), that in general farmers can understand the implementation of Human Rights in oil palm plantations.</p>	
4.1.2	<p>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> <p>- Minor compliance -</p>	<p>Up to this surveillance audit, the auditor team did not identify any use of mercenaries and/or paramilitaries in the company's operational activities.</p> <p>Based on interviews with stakeholders (i.e. Government Agencies, Village Heads, Trade Unions &amp; Labor Unions) as well as online searches there is no indication that the company has committed violence or used any form of harassment, including the use of paid soldiers and paramilitaries in their operational activities.</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><b>(C)</b> 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>- Critical (Major) compliance -</p>	<p>There is no change related to the mechanism to handle complaint and grievance: <i>SOP Penanganan Keluhan dari Eksternal</i> No.AA-GL-5005-R0 01" explains mechanism to resolve external complaint. While for internal complaint/grievance is regarding complaint/grievance from employee/workers: <i>SOP Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan</i> No. AA-HR-308 0.5R0".</p> <p>Separately, the certification unit has also established a mechanism related to land conflict/dispute "<i>SOP Penanganan Konflik Lahan</i> AA-GL-5003.1-R1" effective date on 22/08/2011.</p> <p>Based on interview with several stakeholder during this audit, that there is no land conflict noted.</p> <p><b>Scheme Smallholder:</b></p> <p>There were no changes related to internal and external complaint resolution mechanisms, namely the "<i>Mekanisme Komunikasi dan Konsultasi</i>" dated January 16, 2017, in the form of a Flowchart which describes the process of incoming information requests up to the responses provided. Based on interviews with a sample of farmers, the determination of this mechanism is through a meeting of representatives from farmers and also several community leaders as external parties.</p> <p>Each farmer member has a "<i>Buku Panduan dan Catatan Petani Plasma</i>", which explains the flow of the communication process. Both written and oral communications are conveyed to the 'group management' through the Secretary of each KUD.</p> <p>For internal communication, the ICS Group Manager has set up a "<i>Komunikasi Internal Group Sertifikasi</i>" procedure. SOP No. 007/DOK/SOP/PT IIS KLU-AA/2016 dated 26 November 2016. The SOP describes internal communication mechanisms regarding group members,</p>
		Complied



		<p>extension workers, farmer managers and group managers. The Group Manager is responsible for responding to internal Group communications. Based on interviews with a sample of farmers at KUD Karya Kita, KUD Karya Jaya, KUD Sari Bumi and KUD Sawit Muliaa, no lawsuits were filed against the company.</p>	
<p>4.2.2</p>	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.          - Minor compliance -</p>	<p>Based on document verification and information from agencies and stakeholders at the time of the interview, PT IIS-Tungkal Ulu has several dispute resolution procedures and up to this surveillance there have been no changes and they are still consistently applied up to now, i.e:</p> <ul style="list-style-type: none"> <li>a. Standard Operating Procedure (SOP) No. AA-GL-5003.1-R2 regarding Land Conflict Management which was approved by management on 08 May 2015.</li> <li>b. SOP Penanganan Keluhan Masyarakat No: AA-GL-510.1-R0, dated 1 January 2013, stipulated that:             <ul style="list-style-type: none"> <li><i>4.1 Reporting Public Complaints</i></li> <li><i>4.1.1 General Scope: "Procedures ... for handling complaints from Concerned Parties including organizations, people, groups or institutions ...". In order for the Company to respond appropriately to the Parties' complaints in order to be identified, anonymous questions or complaints (without identity / cannot be traced by their identity) cannot be accepted. "</i></li> <li><i>4.2 Procedure for Handling / Resolving Community Complaints</i></li> <li><i>4.2.5 "This form identifies the person or organization that submitted the complaint, along with the basis of the complaint and the background of the acknowledgment (detailed description of the incident, name of the Party involved, the specific time when the event was the reason for the complaint and the basis of the complaint).</i></li> <li><i>4.2.12 "... The company will endeavour to resolve complaints within 15 working days".</i></li> </ul> </li> </ul>	<p>Complied</p>

		<p>c. The mechanism used for handling employee complaints is as outlined in the SOP document No. AA-HR-308.5-R0, Rev 0 (SOP for Submission and Resolution of Employee Complaints) signed by Management on December 11, 2009. In the SOP, the procedures for submitting and handling employee complaints have been described, starting from how to submit complaints, the time for giving responses, parties who is responsible for responding to every employee complaint and documenting every employee complaint.</p> <p>Resolves disputes system which developed by unit of certification has follows the RSPO Policy on respect for Human Right Defender (HRD) stated in the Human Rights Policy dated 1 December 2019 signed by Managing Director. Separately, the company has also had a policy related a Human Rights Defender, which is stated in the Internal Memorandum No. 049/HO/MEMO/INT/03/20 from Head Operational on 20 March 2020: "Protection against the reporters/defenders of human rights defender from acts of revenge, intimidation and harassment.</p> <p>The external grievances and complaint handling was stipulated as per "<i>Mekanisme Keluhan</i>" which provided in the Website of Asian Agri and can be accessed by all stakeholder of Asian Agri at <a href="https://www.asianagri.com/id/panel-keberlanjutan/keluhan-pengaduan">https://www.asianagri.com/id/panel-keberlanjutan/keluhan-pengaduan</a></p> <p>Asian Agri stakeholders include but are not limited to the Government, farmers, suppliers, vendors, academics, NGOs, media, etc., provided different complaint channels to report their complaints/findings. Reporters can submit complaints and information related to business violations, corruption, harassment, criminal acts, the environment, and others.</p> <p>Based on interview with several of worker, union labor and the stakeholder/local community of Village, that the procedure has been understood, as for the workers and society who cannot read (Illiterates) has been described verbally and in general already know and understand related to the complaint procedure.</p>	
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<p>4.2.3</p>	<p>The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>Since the previous audit, there have been no complaints from the public or other stakeholders. However, the previous case was related to a land dispute with the people of Tanjung Paku Village covering an area of around 107 hectares. Until this audit was carried out, land disputes had been handled by the regional government, namely KESBANGPOL as a mediator in resolving them.</p> <p>The KESBANGPOL Agency is an element implementing supporting functions for government affairs in the fields of national unity and politics. The KESBANGPOL Agency is led by a Head of the Agency whose position is subordinate to and responsible to the Governor of Jambi through the Regional Secretary.</p> <p>Based on an interview with Mr. Taufik (Jambi Province KESBANGPOL Staff), up to now the issue has not yet reached an agreement, even though the company PT IIS – Tungkal Ulu has responded positively with mediation through KESBANGPOL. The last thing KESBANGPOL did was on 2 August 2022 to write a letter to the Head of Merlung Subdistrict with a copy to BPN Tanjung Jabung Barat Regency to conduct a field inspection, but up to now there has been no response from the Head of Merlung Subdistrict.</p> <p>During the ASA2_1 audit (2023), updated information obtained by the auditor was based on the results of interviews with PT IIS management, that PT IIS was committed to resolving this matter in accordance with the SOP for Handling Land Conflicts and also related regulations. Currently, PT IIS respects the existing processes carried out/handled by KESBANGPOL by continuing to maintain communication with the community and KESBANGPOL as a functional element of the Regional Government. Communication carried out by PT IIS Public Relations with the Head of Merlung Village and Community Leaders has gone well and there was no turmoil in the community.</p> <p>Procedurally, PT IIS - Tungkal Ulu has carried out actions and treatments in accordance with established procedures, namely Standard Operating</p>	<p>Complied</p>
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		<p>Procedures (SOP). No. AA-GL-5003.1-R2 concerning Handling Land Conflicts and also related regulations.</p> <p>PT IIS – Tungkal Ulu will respect and follow the conflict resolution process in accordance with applicable regulations and established procedures.</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>- Minor compliance -</p>	<p>Since the previous audit, there have been no complaints from the public or other stakeholders. However, the previous case was related to a land dispute with the people of Tanjung Paku Village covering an area of around 107 hectares. Until this audit was carried out, land disputes had been handled by the regional government, namely KESBANGPOL as a mediator in resolving them.</p> <p>The KESBANGPOL Agency is an element implementing supporting functions for government affairs in the fields of national unity and politics. The KESBANGPOL Agency is led by a Head of the Agency whose position is subordinate to and responsible to the Governor of Jambi through the Regional Secretary.</p> <p>Based on an interview with Mr. Taufik (Jambi Province KESBANGPOL Staff), up to now the issue has not yet reached an agreement, even though the company PT IIS – Tungkal Ulu has responded positively with mediation through KESBANGPOL. The last thing KESBANGPOL did was on 2 August 2022 to write a letter to the Head of Merlung Subdistrict with a copy to BPN Tanjung Jabung Barat Regency to conduct a field inspection, but up to now there has been no response from the Head of Merlung Subdistrict.</p> <p>Procedurally, PT IIS - Tungkal Ulu has carried out actions and treatments in accordance with established procedures, namely Standard Operating Procedures (SOP). No. AA-GL-5003.1-R2 concerning Handling Land Conflicts and also related regulations.</p> <p>PT IIS – Tungkal Ulu will respect and follow the conflict resolution process in accordance with applicable regulations and established procedures.</p>	<p>Complied</p>

**Criteria 4.3:** The unit of certification contributes to local sustainable development as agreed by local communities.

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<p>4.3.1</p>	<p>Contributions to community development that are based on the results of consultation with local community are demonstrated.</p> <p>- Minor compliance -</p>	<p>Based on document verification and interviews with the people of Pulau Pauh and Merlung Village, it is stated that PT IIS-Tungkal Ulu has a CSR program every year. This CSR program is the company's contribution and responsibility to the social and economic aspects of the village communities around the plantation. So, in determining this CSR program, village officials (Village Government), community leaders and other community elements are always involved through the Village Development Planning Conference (MUSREMBANG) which is held every year. The last MUSREMBANG was held in January 2023 and was attended by the company through Public Relations (Mr. Joko).</p> <p>The following are CSR programs for the 2023 with total funds as IDR 128,655,245 period 2023:</p>	<p>Complied</p>
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		CSR Programs in 2023			
		Aspect	Name of CSR Project	Village Location	Budget in 2023
Social	Assistance for tambourin art tools in Merlung Village	Merlung Village	IDR	2.835.441	
	Assistance for religious/National holiday activities in 2023	Merlung, Lubuk Terap, Penyabungan, Rantau badak, Pulau Pauh and Rantau Benar Village	IDR	8.500.000	
	Providing financial assistance to GAPKI	Subdistrict Merlung	IDR	3.500.000	
Economic	Alternative economic assistance for 3 villages	Tanjung Makmur, Tanjung Benanak and Cinta Damai Village	IDR	19.200.000	
Educations	Maintenance of Sustainable Palm Oil at SMKN 6 Tanjung Jabung Barat Regency in Lubuk Kambing Village	Lubuk Kambing Village	IDR	18.000.000	
	Merdeka Curriculum Implementation - 1 (IKM) Education Program at SDN 173 Tanjung Benanak Village	Tanjung Benanak Village	IDR	25.619.804	
Health	Free health examination assistance for Lampisi Village	Lampisi Village	IDR	5.000.000	
Infrastructure	Assistance for construction of clean water facilities and digging wells for 2 units in Tantau Benar Village	Rantau Benar	IDR	7.200.000	
	Assistance for construction of clean water facilities and digging wells for 2 units in Tlubuk Terap Village	Lubuk Terap	IDR	7.200.000	
	Assistance for some building material for procurement of sport facilities in Lampisi Village	Lampisi - SP2	IDR	2.400.000	
	Assistance for construction of clean water facilities and drilling wells for Penyabungan Village (Incl. tower and reservoir)	Penyabungan	IDR	18.000.000	
	helped procure materials for the construction of the al-Ittihad mosque in Lubuk Terap village	Lubuk Terap	IDR	4.000.000	
<b>Total</b>			<b>IDR</b>	<b>121.455.245</b>	

The realization of CSR 2023 (until May):

CSR Realization up to May 2023		
Date	Program Activities	Amount of Assistance Funds
06-Mar-23	Construction of drilled wells to provide clean water in Lampisi Village	IDR 7.400.000
11-Mar-23	Assistance with free health checks in Lampisi and SP-2 Villages	IDR 18.000.000
16-Mar-23	Assistance in purchasing building materials for the provision of sports	IDR 4.000.000
<b>Total</b>		<b>IDR 29.400.000</b>

<b>Criteria 4.4:</b> Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.		
4.4.1	<b>(C)</b> 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	<p><b>Mill and Estate:</b> The certificate holder can show legal ownership, including:</p> <p style="text-align: right;">Complied</p>

<p>history of land tenure and the actual legal or customary use of the land are available.</p> <p>- Critical (Major) compliance -</p>	<ul style="list-style-type: none"> <li>- Izin Prinsip (Principal permit) No. KB.320/859/ Mentan/XI/1983, dated 7 November 1983, approved by Agriculture Ministry for PT. IIS – PIR Trans (+ 65,000 ha) and Izin Lokasi No.746, year 2006 for 1,111 ha in Merlung Sub District, Tanjung Jabung Barat Regency, issued by Bupati Tanjung Jabung Barat.</li> <li>- Izin Usaha Perkebunan – <i>Surat Pendaftaran Usaha Perkebunan/SPUP</i> (Plantation Operational permit) No.187/ Mentanhut/VII/2000, dated 3 November 2000 (±4,759.20 ha).</li> <li>- <i>Izin Usaha Perkebunan Budidaya/IUP B</i> (Plantation operational permit) No.625, year 2008, dated 26 September 2008 (± 1,111 ha).</li> <li>- Forest area release through “<i>Surat Keputusan Menteri Kehutanan No.494/Kpts-II/1991 tentang Pelepasan areal hutan seluas 17,500 Ha terletak di Kelompok Hutan S. Lampisi-S. Palik-palik Kabupaten Dati II Tanjung Jabung dan Seluas 9,356 Ha terletak di Kelompok Hutan S. Kehidupan-S. Singoan, Kabupaten Batanghari, Provinsi Jambi untuk Usaha Budidaya perkebunan dengan pola PIR-TRANS atas nama PT. Inti Indosawit Subur</i>” dated 7 August 1991.</li> <li>- Renewal HGU No.61/HGU/BPN/2005, dated 2 June 2005, approved by BPN (3,503.02 ha). Valid until 31 December 2027.</li> <li>- HGU No.82/HGU/BPN RI/2014, dated 15 May 2014 (1,053.34 ha), valid until 16 May 2049.</li> </ul> <p>Based on identification, document verification and interviews with stakeholders, that at PT IIS – Tungkal Ulu Estate and Mill, there are no customary land ownership upon the Unit of Certification area.</p> <p>Based on interviews with relevant agencies and document verification, it shows that all land managed by PT IIS Tungkal Ulu already has a right to use rights (Hak Guna Usaha) issued by the government.</p> <p>Field observation to HGU poles please refer to indicator 2.1.3</p> <p><b>Scheme smallholders:</b></p>	
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		<p>Plasma management of Tungkal Ulu conducted the evaluation of laws and regulation compliance each year. Latest updated was on 1 January 2023. During audit, Group manager can demonstrate the document of “<i>Evaluasi Kepatuhan Hukum Kebun Plasma Tungkal Ulu Tahun 2023</i>” which contain the list/‘legal register’ of all applicable laws and regulations; consist of: list of regulation, requirement, evaluation record, compliance status, type of document, no. document, validity, source of document, remark. For example:</p> <ul style="list-style-type: none"> <li>a. Cooperative establishment deed</li> <li>b. Private land title (SHM: Sertifikat Hak Milik)</li> <li>c. Environmental permit</li> <li>d. Palm oil cultivation permit</li> </ul> <p>Based on field visits and interviews with sampled farmers, it shows that the plasma land of PT IIS-Tungkal Ulu already has a right of title in the form of a Certificate of Ownership (SHM) issued by the government through the PIR-Trans program. Boundaries between land owned by farmers have been installed in the field in the form of SHM boundary markers or signs in the form of accumulation of oil palm fronds or other signs in the form of planting wood plants along the boundaries of the plots.</p>	
4.4.2	<p>Copies documents evidencing agreement- making processes and negotiated agreements detailing the FPIC process are available and include:</p> <ul style="list-style-type: none"> <li>- Minor compliance -</li> </ul> <p>4.4.2a Evidence that a plan has been developed through consultation and discussion held in good faith with all affected groups within the community, with specific assurances that vulnerable, minority and gender groups are asked for their opinions, and that information has</p>	<p>There are no changes of compliance statement compared to last year audit.</p> <p>PT. Inti Indosawit Subur – Tungkal Ulu is long-established plantation with planting year since 1991 through the PIR-TRANS program, land use-rights already obtained since 2005. The land status is clear, for the previous case was related to a land dispute with the people of Tanjung Paku Village covering an area of around 107 hectares, Until this audit (ASA2_1) was carried out, land disputes had been handled by the regional government, namely KESBANGPOL as a mediator in resolving them.</p>	Not Applicable



	<p>been provided to all affected groups, including in it information about the steps taken to involve them in decision making.</p>	<p>Procedurally, PT IIS - Tungkal Ulu has carried out actions and treatments in accordance with established procedures, namely Standard Operating Procedures (SOP). No. AA-GL-5003.1-R2 concerning Handling Land Conflicts and also related regulations.</p> <p>PT IIS – Tungkal Ulu will respect and follow the conflict resolution process in accordance with applicable regulations and established procedures.</p>	
	<p>4.4.2b Evidence that the unit of certification has respected communities to give or withhold their consent to the operations at the time that these decisions were taken;</p>	<p>There are no changes of compliance statement compared to last year audit.</p> <p>PT. Inti Indosawit Subur – Tungkal Ulu is long-established plantation with planting year since 1991 through the PIR-TRANS program, land use-rights already obtained since 2005. The land status is clear, for the previous case was related to a land dispute with the people of Tanjung Paku Village covering an area of around 107 hectares, Until this audit (ASA2_1) was carried out, land disputes had been handled by the regional government, namely KESBANGPOL as a mediator in resolving them.</p> <p>Procedurally, PT IIS - Tungkal Ulu has carried out actions and treatments in accordance with established procedures, namely Standard Operating Procedures (SOP). No. AA-GL-5003.1-R2 concerning Handling Land Conflicts and also related regulations.</p> <p>PT IIS – Tungkal Ulu will respect and follow the conflict resolution process in accordance with applicable regulations and established procedures.</p>	
	<p>4.4.2c Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities. Including the implications for the legal status of their land at the expiry of the unit of certification’s title, concession or lease on the land.</p>	<p>There are no changes of compliance statement compared to last year audit.</p> <p>PT. Inti Indosawit Subur – Tungkal Ulu is long-established plantation with planting year since 1991 through the PIR-TRANS program, land use-rights already obtained since 2005. The land status is clear, for the previous case was related to a land dispute with the people of Tanjung Paku Village covering an area of around 107 hectares, Until this audit (ASA2_1) was carried out, land disputes had been handled by the regional government, namely KESBANGPOL as a mediator in resolving them.</p>	

		<p>Procedurally, PT IIS - Tungkal Ulu has carried out actions and treatments in accordance with established procedures, namely Standard Operating Procedures (SOP). No. AA-GL-5003.1-R2 concerning Handling Land Conflicts and also related regulations.</p> <p>PT IIS – Tungkal Ulu will respect and follow the conflict resolution process in accordance with applicable regulations and established procedures.</p>	
<p>4.4.3</p>	<p><b>(C)</b> Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).</p> <p>- Critical (Major) compliance -</p>	<p>There are no changes of compliance statement compared to last year audit.</p> <p>PT IIS-Tungkal Ulu has a cadastral measurement that carried out by Badan Peretanan Nasional of Jambi Region and recorded on the peta Bidang Tanah/Land area map, such as:</p> <ul style="list-style-type: none"> <li>- Land Area Map-Situation Drawing Measurement Letter No. 03/1991 dated April 9, 1991 for an area of 3,503.02 ha.</li> <li>- Situation Drawing Measurement Letter No. 27/2014 dated July 7, 2014 for an area of 400.06 ha.</li> <li>- Land Area Map-Situation Drawing Measurement Letter No. 29/2014 dated July 7, 2014 for an area of 5.20 ha.</li> <li>- Land Area Map-Situation Drawing Measurement Letter No. 30/2014 dated July 7, 2014 for an area of 68.74 ha.</li> <li>- Land Area Map-Situation Drawing Measurement Letter No. 31/2014 dated July 7, 2014 for an area of 30.89 ha.</li> <li>- Land Area Map-Situation Drawing Measurement Letter No. 32/2014 dated July 7, 2014 for an area of 40.44 ha.</li> <li>- Land Area Map-Situation Drawing Measurement Letter No. 35/2014 dated July 7, 2014 for an area of 8.56 ha.</li> <li>- Land Area Map-Situation Drawing Measurement Letter No. 33/2014 dated July 7, 2014 for an area of 10.98 ha.</li> <li>- Land Area Map-Situation Drawing Measurement Letter No. 34/2014 dated July 7, 2014 for an area of 4.41 ha.</li> </ul>	<p>Complied</p>

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		<ul style="list-style-type: none"> <li>- Land Area Map-Situation Drawing Measurement Letter No. 36/2014 dated July 7, 2014 for an area of 480.34 ha.</li> <li>- Land Area Map-Situation Drawing Measurement Letter No. 28/2014 dated July 7, 2014 for an area of 3.72 ha.</li> </ul>	
4.4.4	<p>All relevant information is available in appropriate forms and languages, including assessment of impact, proposed benefit sharing, and legal arrangements.</p> <p>- Minor compliance -</p>	<p>There are no changes of compliance statement compared to last year audit.</p> <p>Based on public consultation with related stakeholder (government agencies of Tanjung Jabung Barat Regency and village representatives from Merlung village and Pulau Pauh village) obtain information that there are no customary or indigenous people within the Tungkul Ulu Estate concession.</p>	Complied
4.4.5	<p><b>(C)</b> Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.</p> <p>- Critical (Major) compliance -</p>	<p>There are no changes of compliance statement compared to last year audit.</p> <p>Based on public consultation with related stakeholder (government agencies of Tanjung Jabung Barat Regency and village representatives from Merlung village and Pulau Pauh village) obtain information that there are no customary or indigenous people within the Tungkul Ulu Estate concession.</p>	Complied
4.4.6	<p>There is evidence that implementation of agreement negotiated through FPIC is annually reviewed in consultation with affected parties.</p> <p>- Minor compliance -</p>	<p>There are no changes of compliance statement compared to last year audit.</p> <p>Based on public consultation with related stakeholder (government agencies of Tanjung Jabung Barat Regency and village representatives from Merlung village and Pulau Pauh village) obtain information that there are no customary or indigenous people within the Tungkul Ulu Estate concession.</p>	Complied
<p><b>Criteria 4.5:</b> 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.</p>			
4.5.1	<p><b>(C)</b> Documents showing identification and assessment of demonstrable legal, customary and user rights are available.</p>	<p>There are no changes of compliance statement compared to last year audit. Added information regarding scheme smallholder land status.</p>	Complied

	<p>- Critical (Major) compliance -</p>	<p>PT IIS – Tungkal Ulu was developed since 1991 through the PIR-TRANS program and there is no indication that PT IIS – Tungkal Ulu is currently acquiring new land for oil palm plantations. The certificate holder can show legal ownership, including:</p> <ul style="list-style-type: none"> <li>- Izin Prinsip (Principal permit) No. KB.320/859/ Mentan/XI/1983, dated 7 November 1983, approved by Agriculture Ministry for PT. IIS – PIR Trans (+ 65,000 ha) and Izin Lokasi No.746, year 2006 for 1,111 ha in Merlung Sub District, Tanjung Jabung Barat Regency, issued by Bupati Tanjung Jabung Barat.</li> <li>- Izin Usaha Perkebunan – <i>Surat Pendaftaran Usaha Perkebunan/SPUP</i> (Plantation Operational permit) No.187/ Mentanhut/VII/2000, dated 3 November 2000 (±4,759.20 ha).</li> <li>- <i>Izin Usaha Perkebunan Budidaya/IUP B</i> (Plantation operational permit) No.625, year 2008, dated 26 September 2008 (± 1,111 ha).</li> <li>- Forest area release through “<i>Surat Keputusan Menteri Kehutanan No.494/Kpts-II/1991 tentang Pelepasan areal hutan seluas 17,500 Ha terletak di Kelompok Hutan S. Lampisi-S. Palik-palik Kabupaten Dati II Tanjung Jabung dan Seluas 9,356 Ha terletak di Kelompok Hutan S. Kehidupan-S. Singoan, Kabupaten Batanghari, Provinsi Jambi untuk Usaha Budidaya perkebunan dengan pola PIR-TRANS atas nama PT. Inti Indosawit Subur</i>” dated 7 August 1991.</li> <li>- Renewal HGU No.61/HGU/BPN/2005, dated 2 June 2005, approved by BPN (3,503.02 ha). Valid until 31 December 2027.</li> <li>- HGU No.82/HGU/BPN RI/2014, dated 15 May 2014 (1,053.34 ha), valid until 16 May 2049.</li> </ul> <p>Based on identification, document verification and interviews with stakeholders, that at PT IIS – Tungkal Ulu Estate and Mill, there are no customary land ownership upon the Unit of Certification area.</p> <p>If there is a land dispute, the company will use the procedure as stipulated in the Standard Operating Procedure (SOP) document no. AA-GL-5003.1-</p>	
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		<p>R2 regarding Land Conflict Management which was approved by management on 08 May 2015.</p> <p><b>Scheme Smallholder:</b>          During field observation and interview with sampled smallholders, obtained information that there was no land dispute within smallholders' area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders' plots already have legal use rights.</p>	
<p>4.5.2</p>	<p><b>(C)</b> FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions. All the relevant information and documents are made available, and community have option of resourced access to independent third-party advice through a documented, long-term and two- way process of consultation and negotiation.</p> <p>- Critical (Major) compliance -</p>	<p>There are no changes of compliance statement compared to last year audit. Added information regarding scheme smallholder land status.</p> <p>PT IIS – Tungkal Ulu was developed since 1991 through the PIR-TRANS program and there is no indication that PT IIS – Tungkal Ulu is currently acquiring new land for oil palm plantations. The certificate holder can show legal ownership, including:</p> <ul style="list-style-type: none"> <li>- Izin Prinsip (Principal permit) No. KB.320/859/ Mentan/XI/1983, dated 7 November 1983, approved by Agriculture Ministry for PT. IIS – PIR Trans (+ 65,000 ha) and Izin Lokasi No.746, year 2006 for 1,111 ha in Merlung Sub District, Tanjung Jabung Barat Regency, issued by Bupati Tanjung Jabung Barat.</li> <li>- Izin Usaha Perkebunan – <i>Surat Pendaftaran Usaha Perkebunan/SPUP</i> (Plantation Operational permit) No.187/ Mentanhut/VII/2000, dated 3 November 2000 (±4,759.20 ha).</li> <li>- <i>Izin Usaha Perkebunan Budidaya/IUP B</i> (Plantation operational permit) No.625, year 2008, dated 26 September 2008 (± 1,111 ha).</li> <li>- Forest area release through "<i>Surat Keputusan Menteri Kehutanan No.494/Kpts-II/1991 tentang Pelepasan areal hutan seluas 17,500 Ha terletak di Kelompok Hutan S. Lampisi-S. Palik-palik Kabupaten Dati II Tanjung Jabung dan Seluas 9,356 Ha terletak di Kelompok Hutan S. Kehidupan-S. Singoan, Kabupaten Batanghari, Provinsi Jambi</i></li> </ul>	<p>Complied</p>

		<p><i>untuk Usaha Budidaya perkebunan dengan pola PIR-TRANS atas nama PT. Inti Indosawit Subur” dated 7 August 1991.</i></p> <ul style="list-style-type: none"> <li>- Renewal HGU No.61/HGU/BPN/2005, dated 2 June 2005, approved by BPN (3,503.02 ha). Valid until 31 December 2027.</li> <li>- HGU No.82/HGU/BPN RI/2014, dated 15 May 2014 (1,053.34 ha), valid until 16 May 2049.</li> </ul> <p>Based on identification, document verification and interviews with stakeholders, that at PT IIS – Tungkal Ulu Estate and Mill, there are no customary land ownership upon the Unit of Certification area.</p> <p>If there is a land dispute, the company will use the procedure as stipulated in the Standard Operating Procedure (SOP) document no. AA-GL-5003.1-R2 regarding Land Conflict Management which was approved by management on 08 May 2015.</p> <p><b>Scheme Smallholder:</b></p> <p>During field observation and interview with sampled smallholders, obtained information that there was no land dispute within smallholders’ area since the plantation developed. Smallholders land obtained based on government program “Transmigrasi” in early 1980’s, therefore all smallholders’ plots already have legal use rights.</p>	
4.5.3	<p>Evidence is available that affected local peoples understand they have the right to say ‘agree’ or ‘not agree’ to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p> <p>- Minor compliance -</p>	<p>There are no changes of compliance statement compared to last year audit. Added information regarding scheme smallholder land status.</p> <p>PT IIS – Tungkal Ulu was developed since 1991 through the PIR-TRANS program and there is no indication that PT IIS – Tungkal Ulu is currently acquiring new land for oil palm plantations. The certificate holder can show legal ownership, including:</p> <ul style="list-style-type: none"> <li>- Izin Prinsip (Principal permit) No. KB.320/859/ Mentan/XI/1983, dated 7 November 1983, approved by Agriculture Ministry for PT. IIS – PIR Trans (+ 65,000 ha) and Izin Lokasi No.746, year 2006 for</li> </ul>	Complied

		<p>1,111 ha in Merlung Sub District, Tanjung Jabung Barat Regency, issued by Bupati Tanjung Jabung Barat.</p> <ul style="list-style-type: none"> <li>- Izin Usaha Perkebunan – <i>Surat Pendaftaran Usaha Perkebunan/SPUP</i> (Plantation Operational permit) No.187/ Mentanhut/VII/2000, dated 3 November 2000 (±4,759.20 ha).</li> <li>- <i>Izin Usaha Perkebunan Budidaya/IUP B</i> (Plantation operational permit) No.625, year 2008, dated 26 September 2008 (± 1,111 ha).</li> <li>- Forest area release through “<i>Surat Keputusan Menteri Kehutanan No.494/Kpts-II/1991 tentang Pelepasan areal hutan seluas 17,500 Ha terletak di Kelompok Hutan S. Lampisi-S. Palik-palik Kabupaten Dati II Tanjung Jabung dan Seluas 9,356 Ha terletak di Kelompok Hutan S. Kehidupan-S. Singoan, Kabupaten Batanghari, Provinsi Jambi untuk Usaha Budidaya perkebunan dengan pola PIR-TRANS atas nama PT. Inti Indosawit Subur</i>” dated 7 August 1991.</li> <li>- Renewal HGU No.61/HGU/BPN/2005, dated 2 June 2005, approved by BPN (3,503.02 ha). Valid until 31 December 2027.</li> <li>- HGU No.82/HGU/BPN RI/2014, dated 15 May 2014 (1,053.34 ha), valid until 16 May 2049.</li> </ul> <p>Based on identification, document verification and interviews with stakeholders, that at PT IIS – Tungkal Ulu Estate and Mill, there are no customary land ownership upon the Unit of Certification area.</p> <p>If there is a land dispute, the company will use the procedure as stipulated in the Standard Operating Procedure (SOP) document no. AA-GL-5003.1-R2 regarding Land Conflict Management which was approved by management on 08 May 2015.</p> <p><b>Scheme Smallholder:</b></p> <p>During field observation and interview with sampled smallholders, obtained information that there was no land dispute within smallholders’ area since the plantation developed. Smallholders land obtained based on</p>	
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		<p>government program "Transmigrasi" in early 1980's, therefore all smallholders' plots already have legal use rights.</p>	
<p>4.5.4</p>	<p>To ensure local food and water security and as part of the FPIC process, SEIA participation and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of land allocations process.</p> <p>- Minor compliance -</p>	<p>There are no changes of compliance statement compared to last year audit. Added information regarding scheme smallholder land status.</p> <p>PT IIS – Tungkal Ulu was developed since 1991 through the PIR-TRANS program and there is no indication that PT IIS – Tungkal Ulu is currently acquiring new land for oil palm plantations. The certificate holder can show legal ownership, including:</p> <ul style="list-style-type: none"> <li>- Izin Prinsip (Principal permit) No. KB.320/859/ Mentan/XI/1983, dated 7 November 1983, approved by Agriculture Ministry for PT. IIS – PIR Trans (+ 65,000 ha) and Izin Lokasi No.746, year 2006 for 1,111 ha in Merlung Sub District, Tanjung Jabung Barat Regency, issued by Bupati Tanjung Jabung Barat.</li> <li>- Izin Usaha Perkebunan – <i>Surat Pendaftaran Usaha Perkebunan/SPUP</i> (Plantation Operational permit) No.187/ Mentanhut/VII/2000, dated 3 November 2000 (±4,759.20 ha).</li> <li>- <i>Izin Usaha Perkebunan Budidaya/IUP B</i> (Plantation operational permit) No.625, year 2008, dated 26 September 2008 (± 1,111 ha).</li> <li>- Forest area release through "<i>Surat Keputusan Menteri Kehutanan No.494/Kpts-II/1991 tentang Pelepasan areal hutan seluas 17,500 Ha terletak di Kelompok Hutan S. Lampisi-S. Palik-palik Kabupaten Dati II Tanjung Jabung dan Seluas 9,356 Ha terletak di Kelompok Hutan S. Kehidupan-S. Singoan, Kabupaten Batanghari, Provinsi Jambi untuk Usaha Budidaya perkebunan dengan pola PIR-TRANS atas nama PT. Inti Indosawit Subur</i>" dated 7 August 1991.</li> <li>- Renewal HGU No.61/HGU/BPN/2005, dated 2 June 2005, approved by BPN (3,503.02 ha). Valid until 31 December 2027.</li> <li>- HGU No.82/HGU/BPN RI/2014, dated 15 May 2014 (1,053.34 ha), valid until 16 May 2049.</li> </ul>	<p>Complied</p>



		<p>Based on identification, document verification and interviews with stakeholders, that at PT IIS – Tungkal Ulu Estate and Mill, there are no customary land ownership upon the Unit of Certification area.</p> <p>If there is a land dispute, the company will use the procedure as stipulated in the Standard Operating Procedure (SOP) document no. AA-GL-5003.1-R2 regarding Land Conflict Management which was approved by management on 08 May 2015.</p> <p><b>Scheme Smallholder:</b></p> <p>During field observation and interview with sampled smallholders, obtained information there was no land dispute within smallholders’ area since the plantation developed. Smallholders land obtained based on government program “Transmigrasi” in early 1980’s, therefore all smallholders plot already have legal use rights.</p>	
<p>4.5.5</p>	<p>Evidence is available that the affected communities and rights holders have had the option to access information and advice, that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.</p> <p>- Minor compliance -</p>	<p>There are no changes of compliance statement compared to last year audit. Added information regarding scheme smallholder land status.</p> <p>PT IIS – Tungkal Ulu was developed since 1991 through the PIR-TRANS program and there is no indication that PT IIS – Tungkal Ulu is currently acquiring new land for oil palm plantations. The certificate holder can show legal ownership, including:</p> <ul style="list-style-type: none"> <li>- Izin Prinsip (Principal permit) No. KB.320/859/ Mentan/XI/1983, dated 7 November 1983, approved by Agriculture Ministry for PT. IIS – PIR Trans (+ 65,000 ha) and Izin Lokasi No.746, year 2006 for 1,111 ha in Merlung Sub District, Tanjung Jabung Barat Regency, issued by Bupati Tanjung Jabung Barat.</li> <li>- Izin Usaha Perkebunan – <i>Surat Pendaftaran Usaha Perkebunan/SPUP</i> (Plantation Operational permit) No.187/ Mentanhut/VII/2000, dated 3 November 2000 (±4,759.20 ha).</li> <li>- <i>Izin Usaha Perkebunan Budidaya/IUP B</i> (Plantation operational permit) No.625, year 2008, dated 26 September 2008 (± 1,111 ha).</li> </ul>	<p>Complied</p>

		<ul style="list-style-type: none"> <li>- Forest area release through “<i>Surat Keputusan Menteri Kehutanan No.494/Kpts-II/1991 tentang Pelepasan areal hutan seluas 17,500 Ha terletak di Kelompok Hutan S. Lampisi-S. Palik-palik Kabupaten Dati II Tanjung Jabung dan Seluas 9,356 Ha terletak di Kelompok Hutan S. Kehidupan-S. Singoan, Kabupaten Batanghari, Provinsi Jambi untuk Usaha Budidaya perkebunan dengan pola PIR-TRANS atas nama PT. Inti Indosawit Subur</i>” dated 7 August 1991.</li> <li>- Renewal HGU No.61/HGU/BPN/2005, dated 2 June 2005, approved by BPN (3,503.02 ha). Valid until 31 December 2027.</li> <li>- HGU No.82/HGU/BPN RI/2014, dated 15 May 2014 (1,053.34 ha), valid until 16 May 2049.</li> </ul> <p>Based on identification, document verification and interviews with stakeholders, that at PT IIS – Tungkal Ulu Estate and Mill, there are no customary land ownership upon the Unit of Certification area.</p> <p>If there is a land dispute, the company will use the procedure as stipulated in the Standard Operating Procedure (SOP) document no. AA-GL-5003.1-R2 regarding Land Conflict Management which was approved by management on 08 May 2015.</p> <p><b>Scheme Smallholder:</b></p> <p>During field observation and interview with sampled smallholders, obtained information that there was no land dispute within smallholders’ area since the plantation developed. Smallholders land obtained based on government program “Transmigrasi” in early 1980’s, therefore all smallholders’ plots already have legal use rights.</p>	
4.5.6	<p>Evidence is available that the communities or their representatives gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.</p> <p>- Minor compliance -</p>	<p>There are no changes of compliance statement compared to last year audit. Added information regarding scheme smallholder land status.</p> <p>PT IIS – Tungkal Ulu was developed since 1991 through the PIR-TRANS program and there is no indication that PT IIS – Tungkal Ulu is currently</p>	Complied

		<p>acquiring new land for oil palm plantations. The certificate holder can show legal ownership, including:</p> <ul style="list-style-type: none"> <li>- Izin Prinsip (Principal permit) No. KB.320/859/ Mentan/XI/1983, dated 7 November 1983, approved by Agriculture Ministry for PT. IIS – PIR Trans (+ 65,000 ha) and Izin Lokasi No.746, year 2006 for 1,111 ha in Merlung Sub District, Tanjung Jabung Barat Regency, issued by Bupati Tanjung Jabung Barat.</li> <li>- Izin Usaha Perkebunan – <i>Surat Pendaftaran Usaha Perkebunan/SPUP</i> (Plantation Operational permit) No.187/ Mentanhut/VII/2000, dated 3 November 2000 (±4,759.20 ha).</li> <li>- <i>Izin Usaha Perkebunan Budidaya/IUP B</i> (Plantation operational permit) No.625, year 2008, dated 26 September 2008 (± 1,111 ha).</li> <li>- Forest area release through "<i>Surat Keputusan Menteri Kehutanan No.494/Kpts-II/1991 tentang Pelepasan areal hutan seluas 17,500 Ha terletak di Kelompok Hutan S. Lampisi-S. Palik-palik Kabupaten Dati II Tanjung Jabung dan Seluas 9,356 Ha terletak di Kelompok Hutan S. Kehidupan-S. Singoan, Kabupaten Batanghari, Provinsi Jambi untuk Usaha Budidaya perkebunan dengan pola PIR-TRANS atas nama PT. Inti Indosawit Subur</i>" dated 7 August 1991.</li> <li>- Renewal HGU No.61/HGU/BPN/2005, dated 2 June 2005, approved by BPN (3,503.02 ha). Valid until 31 December 2027.</li> <li>- HGU No.82/HGU/BPN RI/2014, dated 15 May 2014 (1,053.34 ha), valid until 16 May 2049.</li> </ul> <p>Based on identification, document verification and interviews with stakeholders, that at PT IIS – Tungal Ulu Estate and Mill, there are no customary land ownership upon the Unit of Certification area.</p> <p>If there is a land dispute, the company will use the procedure as stipulated in the Standard Operating Procedure (SOP) document no. AA-GL-5003.1-R2 regarding Land Conflict Management which was approved by management on 08 May 2015.</p>	
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		<p><b>Scheme Smallholder:</b>          During field observation and interview with sampled smallholders, obtained information that there was no land dispute within smallholders' area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders' plots already have legal use rights.</p>	
<p>4.5.7</p>	<p>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.</p> <p>- Minor compliance -</p>	<p>There are no changes of compliance statement compared to last year audit. Added information regarding scheme smallholder land status.</p> <p>PT IIS – Tungkal Ulu was developed since 1991 through the PIR-TRANS program and there is no indication that PT IIS – Tungkal Ulu is currently acquiring new land for oil palm plantations. The certificate holder can show legal ownership, including:</p> <ul style="list-style-type: none"> <li>- Izin Prinsip (Principal permit) No. KB.320/859/ Mentan/XI/1983, dated 7 November 1983, approved by Agriculture Ministry for PT. IIS – PIR Trans (+ 65,000 ha) and Izin Lokasi No.746, year 2006 for 1,111 ha in Merlung Sub District, Tanjung Jabung Barat Regency, issued by Bupati Tanjung Jabung Barat.</li> <li>- Izin Usaha Perkebunan – <i>Surat Pendaftaran Usaha Perkebunan/SPUP</i> (Plantation Operational permit) No.187/ Mentanhut/VII/2000, dated 3 November 2000 (±4,759.20 ha).</li> <li>- <i>Izin Usaha Perkebunan Budidaya/IUP B</i> (Plantation operational permit) No.625, year 2008, dated 26 September 2008 (± 1,111 ha).</li> <li>- Forest area release through "<i>Surat Keputusan Menteri Kehutanan No.494/Kpts-II/1991 tentang Pelepasan areal hutan seluas 17,500 Ha terletak di Kelompok Hutan S. Lampisi-S. Palik-palik Kabupaten Dati II Tanjung Jabung dan Seluas 9,356 Ha terletak di Kelompok Hutan S. Kehidupan-S. Singoan, Kabupaten Batanghari, Provinsi Jambi untuk Usaha Budidaya perkebunan dengan pola PIR-TRANS atas nama PT. Inti Indosawit Subur</i>" dated 7 August 1991.</li> </ul>	<p>Complied</p>

		<ul style="list-style-type: none"> <li>- Renewal HGU No.61/HGU/BPN/2005, dated 2 June 2005, approved by BPN (3,503.02 ha). Valid until 31 December 2027.</li> <li>- HGU No.82/HGU/BPN RI/2014, dated 15 May 2014 (1,053.34 ha), valid until 16 May 2049.</li> </ul> <p>Based on identification, document verification and interviews with stakeholders, that at PT IIS – Tungkal Ulu Estate and Mill, there are no customary land ownership upon the Unit of Certification area.</p> <p>If there is a land dispute, the company will use the procedure as stipulated in the Standard Operating Procedure (SOP) document no. AA-GL-5003.1-R2 regarding Land Conflict Management which was approved by management on 08 May 2015.</p> <p><b>Scheme Smallholder:</b></p> <p>During field observation and interview with sampled smallholders, obtained information that there was no land dispute within smallholders’ area since the plantation developed. Smallholders land obtained based on government program “Transmigrasi” in early 1980’s, therefore all smallholders’ plots already have legal use rights.</p>	
4.5.8	<p><b>(C)</b> New lands are not acquired in areas inhabited by communities in voluntary isolation.</p> <p>- Critical (Major) compliance -</p>	<p>There are no changes of compliance statement compared to last year audit. Added information regarding scheme smallholder land status.</p> <p>PT IIS – Tungkal Ulu was developed since 1991 through the PIR-TRANS program and there is no indication that PT IIS – Tungkal Ulu is currently acquiring new land for oil palm plantations. The certificate holder can show legal ownership, including:</p> <ul style="list-style-type: none"> <li>- Izin Prinsip (Principal permit) No. KB.320/859/ Mentan/XI/1983, dated 7 November 1983, approved by Agriculture Ministry for PT. IIS – PIR Trans (+ 65,000 ha) and Izin Lokasi No.746, year 2006 for 1,111 ha in Merlung Sub District, Tanjung Jabung Barat Regency, issued by Bupati Tanjung Jabung Barat.</li> </ul>	Complied

		<ul style="list-style-type: none"> <li>- Izin Usaha Perkebunan – <i>Surat Pendaftaran Usaha Perkebunan/SPUP</i> (Plantation Operational permit) No.187/ Mentanhut/VII/2000, dated 3 November 2000 (<math>\pm 4,759.20</math> ha).</li> <li>- <i>Izin Usaha Perkebunan Budidaya/IUP B</i> (Plantation operational permit) No.625, year 2008, dated 26 September 2008 (<math>\pm 1,111</math> ha).</li> <li>- Forest area release through “<i>Surat Keputusan Menteri Kehutanan No.494/Kpts-II/1991 tentang Pelepasan areal hutan seluas 17,500 Ha terletak di Kelompok Hutan S. Lampisi-S. Palik-palik Kabupaten Dati II Tanjung Jabung dan Seluas 9,356 Ha terletak di Kelompok Hutan S. Kehidupan-S. Singoan, Kabupaten Batanghari, Provinsi Jambi untuk Usaha Budidaya perkebunan dengan pola PIR-TRANS atas nama PT. Inti Indosawit Subur</i>” dated 7 August 1991.</li> <li>- Renewal HGU No.61/HGU/BPN/2005, dated 2 June 2005, approved by BPN (3,503.02 ha). Valid until 31 December 2027.</li> <li>- HGU No.82/HGU/BPN RI/2014, dated 15 May 2014 (1,053.34 ha), valid until 16 May 2049.</li> </ul> <p>Based on identification, document verification and interviews with stakeholders, that at PT IIS – Tungkal Ulu Estate and Mill, there are no customary land ownership upon the Unit of Certification area.</p> <p>If there is a land dispute, the company will use the procedure as stipulated in the Standard Operating Procedure (SOP) document no. AA-GL-5003.1-R2 regarding Land Conflict Management which was approved by management on 08 May 2015.</p> <p><b>Scheme Smallholder:</b></p> <p>During field observation and interview with sampled smallholders, obtained information that there was no land dispute within smallholders’ area since the plantation developed. Smallholders land obtained based on government program “Transmigrasi” in early 1980’s, therefore all smallholders’ plots already have legal use rights.</p>	
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<p><b>Criteria 4.6:</b> 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.</p>		
<p>4.6.1</p>	<p><b>(C)</b> A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.</p> <p>- Critical (Major) compliance -</p>	<p>There are no changes of compliance statement compared to last year audit. Added information regarding scheme smallholder land status.</p> <p>PT IIS – Tungkal Ulu was developed since 1991 through the PIR-TRANS program and there is no indication that PT IIS – Tungkal Ulu is currently acquiring new land for oil palm plantations. The certificate holder can show legal ownership, including:</p> <ul style="list-style-type: none"> <li>- Izin Prinsip (Principal permit) No. KB.320/859/ Mentan/XI/1983, dated 7 November 1983, approved by Agriculture Ministry for PT. IIS – PIR Trans (+ 65,000 ha) and Izin Lokasi No.746, year 2006 for 1,111 ha in Merlung Sub District, Tanjung Jabung Barat Regency, issued by Bupati Tanjung Jabung Barat.</li> <li>- Izin Usaha Perkebunan – <i>Surat Pendaftaran Usaha Perkebunan/SPUP</i> (Plantation Operational permit) No.187/ Mentanhut/VII/2000, dated 3 November 2000 (±4,759.20 ha).</li> <li>- <i>Izin Usaha Perkebunan Budidaya/IUP B</i> (Plantation operational permit) No.625, year 2008, dated 26 September 2008 (± 1,111 ha).</li> <li>- Forest area release through "<i>Surat Keputusan Menteri Kehutanan No.494/Kpts-II/1991 tentang Pelepasan areal hutan seluas 17,500 Ha terletak di Kelompok Hutan S. Lampisi-S. Palik-palik Kabupaten Dati II Tanjung Jabung dan Seluas 9,356 Ha terletak di Kelompok Hutan S. Kehidupan-S. Singoan, Kabupaten Batanghari, Provinsi Jambi untuk Usaha Budidaya perkebunan dengan pola PIR-TRANS atas nama PT. Inti Indosawit Subur</i>" dated 7 August 1991.</li> <li>- Renewal HGU No.61/HGU/BPN/2005, dated 2 June 2005, approved by BPN (3,503.02 ha). Valid until 31 December 2027.</li> <li>- HGU No.82/HGU/BPN RI/2014, dated 15 May 2014 (1,053.34 ha), valid until 16 May 2049.</li> </ul>
		<p>Complied</p>

		<p>Based on identification, document verification and interviews with stakeholders, that at PT IIS – Tungkal Ulu Estate and Mill, there are no customary land ownership upon the Unit of Certification area.</p> <p>If there is a land dispute, the company will use the procedure as stipulated in the Standard Operating Procedure (SOP) document no. AA-GL-5003.1-R2 regarding Land Conflict Management which was approved by management on 08 May 2015.</p> <p><b>Scheme Smallholder:</b></p> <p>During field observation and interview with sampled smallholders, obtained information that there was no land dispute within smallholders' area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders' plots already have legal use rights.</p>	
<p>4.6.2</p>	<p><b>(C)</b> 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>- Critical (Major) compliance -</p>	<p>There are no changes of compliance statement compared to last year audit. Added information regarding scheme smallholder land status.</p> <p>PT IIS – Tungkal Ulu was developed since 1991 through the PIR-TRANS program and there is no indication that PT IIS – Tungkal Ulu is currently acquiring new land for oil palm plantations. The certificate holder can show legal ownership, including:</p> <ul style="list-style-type: none"> <li>- Izin Prinsip (Principal permit) No. KB.320/859/ Mentan/XI/1983, dated 7 November 1983, approved by Agriculture Ministry for PT. IIS – PIR Trans (+ 65,000 ha) and Izin Lokasi No.746, year 2006 for 1,111 ha in Merlung Sub District, Tanjung Jabung Barat Regency, issued by Bupati Tanjung Jabung Barat.</li> <li>- Izin Usaha Perkebunan – <i>Surat Pendaftaran Usaha Perkebunan/SPUP</i> (Plantation Operational permit) No.187/ Mentanhut/VII/2000, dated 3 November 2000 (±4,759.20 ha).</li> <li>- <i>Izin Usaha Perkebunan Budidaya/IUP B</i> (Plantation operational permit) No.625, year 2008, dated 26 September 2008 (± 1,111 ha).</li> </ul>	<p>Complied</p>



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<p>4.6.3</p>	<p>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> <p>- Minor compliance -</p>	<p>There are no changes of compliance statement compared to last year audit. Added information regarding scheme smallholder land status.</p> <p>PT IIS – Tungkal Ulu was developed since 1991 through the PIR-TRANS program and there is no indication that PT IIS – Tungkal Ulu is currently</p>	<p>Complied</p>

		<p>acquiring new land for oil palm plantations. The certificate holder can show legal ownership, including:</p> <ul style="list-style-type: none"> <li>- Izin Prinsip (Principal permit) No. KB.320/859/ Mentan/XI/1983, dated 7 November 1983, approved by Agriculture Ministry for PT. IIS – PIR Trans (+ 65,000 ha) and Izin Lokasi No.746, year 2006 for 1,111 ha in Merlung Sub District, Tanjung Jabung Barat Regency, issued by Bupati Tanjung Jabung Barat.</li> <li>- Izin Usaha Perkebunan – <i>Surat Pendaftaran Usaha Perkebunan/SPUP</i> (Plantation Operational permit) No.187/ Mentanhut/VII/2000, dated 3 November 2000 (±4,759.20 ha).</li> <li>- <i>Izin Usaha Perkebunan Budidaya/IUP B</i> (Plantation operational permit) No.625, year 2008, dated 26 September 2008 (± 1,111 ha).</li> <li>- Forest area release through "<i>Surat Keputusan Menteri Kehutanan No.494/Kpts-II/1991 tentang Pelepasan areal hutan seluas 17,500 Ha terletak di Kelompok Hutan S. Lampisi-S. Palik-palik Kabupaten Dati II Tanjung Jabung dan Seluas 9,356 Ha terletak di Kelompok Hutan S. Kehidupan-S. Singoan, Kabupaten Batanghari, Provinsi Jambi untuk Usaha Budidaya perkebunan dengan pola PIR-TRANS atas nama PT. Inti Indosawit Subur</i>" dated 7 August 1991.</li> <li>- Renewal HGU No.61/HGU/BPN/2005, dated 2 June 2005, approved by BPN (3,503.02 ha). Valid until 31 December 2027.</li> <li>- HGU No.82/HGU/BPN RI/2014, dated 15 May 2014 (1,053.34 ha), valid until 16 May 2049.</li> </ul> <p>Based on identification, document verification and interviews with stakeholders, that at PT IIS – Tungal Ulu Estate and Mill, there are no customary land ownership upon the Unit of Certification area.</p> <p>If there is a land dispute, the company will use the procedure as stipulated in the Standard Operating Procedure (SOP) document no. AA-GL-5003.1-R2 regarding Land Conflict Management which was approved by management on 08 May 2015.</p>	
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		<p><b>Scheme Smallholder:</b></p> <p>During field observation and interview with sampled smallholders, obtained information there was no land dispute within smallholders' area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plot already have legal use rights.</p>	
<p>4.6.4</p>	<p>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> <p>- Minor compliance -</p>	<p>There are no changes of compliance statement compared to last year audit. Added information regarding scheme smallholder land status.</p> <p>PT IIS – Tungkal Ulu was developed since 1991 through the PIR-TRANS program and there is no indication that PT IIS – Tungkal Ulu is currently acquiring new land for oil palm plantations. The certificate holder can show legal ownership, including:</p> <ul style="list-style-type: none"> <li>- Izin Prinsip (Principal permit) No. KB.320/859/ Mentan/XI/1983, dated 7 November 1983, approved by Agriculture Ministry for PT. IIS – PIR Trans (+ 65,000 ha) and Izin Lokasi No.746, year 2006 for 1,111 ha in Merlung Sub District, Tanjung Jabung Barat Regency, issued by Bupati Tanjung Jabung Barat.</li> <li>- Izin Usaha Perkebunan – <i>Surat Pendaftaran Usaha Perkebunan/SPUP</i> (Plantation Operational permit) No.187/ Mentanhut/VII/2000, dated 3 November 2000 (±4,759.20 ha).</li> <li>- <i>Izin Usaha Perkebunan Budidaya/IUP B</i> (Plantation operational permit) No.625, year 2008, dated 26 September 2008 (± 1,111 ha).</li> <li>- Forest area release through "<i>Surat Keputusan Menteri Kehutanan No.494/Kpts-II/1991 tentang Pelepasan areal hutan seluas 17,500 Ha terletak di Kelompok Hutan S. Lampisi-S. Palik-palik Kabupaten Dati II Tanjung Jabung dan Seluas 9,356 Ha terletak di Kelompok Hutan S. Kehidupan-S. Singoan, Kabupaten Batanghari, Provinsi Jambi untuk Usaha Budidaya perkebunan dengan pola PIR-TRANS atas nama PT. Inti Indosawit Subur</i>" dated 7 August 1991.</li> <li>- Renewal HGU No.61/HGU/BPN/2005, dated 2 June 2005, approved by BPN (3,503.02 ha). Valid until 31 December 2027.</li> </ul>	<p>Complied</p>

		<p>- HGU No.82/HGU/BPN RI/2014, dated 15 May 2014 (1,053.34 ha), valid until 16 May 2049.</p> <p>Based on identification, document verification and interviews with stakeholders, that at PT IIS – Tungkal Ulu Estate and Mill, there are no customary land ownership upon the Unit of Certification area.</p> <p>If there is a land dispute, the company will use the procedure as stipulated in the Standard Operating Procedure (SOP) document no. AA-GL-5003.1-R2 regarding Land Conflict Management which was approved by management on 08 May 2015.</p> <p><b>Scheme Smallholder:</b></p> <p>During field observation and interview with sampled smallholders, obtained information there was no land dispute within smallholders’ area since the plantation developed. Smallholders land obtained based on government program “Transmigrasi” in early 1980’s, therefore all smallholders plot already have legal use rights.</p>	
<p><b>Criteria 4.7:</b> 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><b>(C)</b> A mutually agreed procedure for identifying people entitled to compensation is in place.</p> <p>- Critical (Major) compliance -</p>	<p>There are no changes of compliance statement compared to last year audit. Added information regarding scheme smallholder land status.</p> <p>PT IIS – Tungkal Ulu was developed since 1991 through the PIR-TRANS program and there is no indication that PT IIS – Tungkal Ulu is currently acquiring new land for oil palm plantations. The certificate holder can show legal ownership, including:</p> <ul style="list-style-type: none"> <li>- Izin Prinsip (Principal permit) No. KB.320/859/ Mentan/XI/1983, dated 7 November 1983, approved by Agriculture Ministry for PT. IIS – PIR Trans (+ 65,000 ha) and Izin Lokasi No.746, year 2006 for 1,111 ha in Merlung Sub District, Tanjung Jabung Barat Regency, issued by Bupati Tanjung Jabung Barat.</li> </ul>	<p>Complied</p>

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<p>4.7.2</p>	<p><b>(C)</b> 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>- Critical (Major) compliance -</p>	<p>There are no changes of compliance statement compared to last year audit. Added information regarding scheme smallholder land status.</p> <p>PT IIS – Tungkal Ulu was developed since 1991 through the PIR-TRANS program and there is no indication that PT IIS – Tungkal Ulu is currently acquiring new land for oil palm plantations. The certificate holder can show legal ownership, including:</p> <ul style="list-style-type: none"> <li>- Izin Prinsip (Principal permit) No. KB.320/859/ Mentan/XI/1983, dated 7 November 1983, approved by Agriculture Ministry for PT. IIS – PIR Trans (+ 65,000 ha) and Izin Lokasi No.746, year 2006 for 1,111 ha in Merlung Sub District, Tanjung Jabung Barat Regency, issued by Bupati Tanjung Jabung Barat.</li> <li>- Izin Usaha Perkebunan – <i>Surat Pendaftaran Usaha Perkebunan/SPUP</i> (Plantation Operational permit) No.187/ Mentanhut/VII/2000, dated 3 November 2000 (±4,759.20 ha).</li> <li>- <i>Izin Usaha Perkebunan Budidaya/IUP B</i> (Plantation operational permit) No.625, year 2008, dated 26 September 2008 (± 1,111 ha).</li> <li>- Forest area release through "<i>Surat Keputusan Menteri Kehutanan No.494/Kpts-II/1991 tentang Pelepasan areal hutan seluas 17,500 Ha terletak di Kelompok Hutan S. Lampisi-S. Palik-palik Kabupaten Dati II Tanjung Jabung dan Seluas 9,356 Ha terletak di Kelompok Hutan S. Kehidupan-S. Singoan, Kabupaten Batanghari, Provinsi Jambi untuk Usaha Budidaya perkebunan dengan pola PIR-TRANS atas nama PT. Inti Indosawit Subur</i>" dated 7 August 1991.</li> <li>- Renewal HGU No.61/HGU/BPN/2005, dated 2 June 2005, approved by BPN (3,503.02 ha). Valid until 31 December 2027.</li> <li>- HGU No.82/HGU/BPN RI/2014, dated 15 May 2014 (1,053.34 ha), valid until 16 May 2049.</li> </ul> <p>Based on identification, document verification and interviews with stakeholders, that at PT IIS – Tungkal Ulu Estate and Mill, there are no customary land ownership upon the Unit of Certification area.</p>	<p>Complied</p>
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		<p>If there is a land dispute, the company will use the procedure as stipulated in the Standard Operating Procedure (SOP) document no. AA-GL-5003.1-R2 regarding Land Conflict Management which was approved by management on 08 May 2015.</p> <p><b>Scheme Smallholder:</b></p> <p>During field observation and interview with sampled smallholders, obtained information there was no land dispute within smallholders' area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders' plots already have legal use rights.</p>	
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>- Minor compliance -</p>	<p>There are no changes of compliance statement compared to last year audit. Added information regarding scheme smallholder land status.</p> <p>PT IIS – Tungkal Ulu was developed since 1991 through the PIR-TRANS program and there is no indication that PT IIS – Tungkal Ulu is currently acquiring new land for oil palm plantations. The certificate holder can show legal ownership, including:</p> <ul style="list-style-type: none"> <li>- Izin Prinsip (Principal permit) No. KB.320/859/ Mentan/XI/1983, dated 7 November 1983, approved by Agriculture Ministry for PT. IIS – PIR Trans (+ 65,000 ha) and Izin Lokasi No.746, year 2006 for 1,111 ha in Merlung Sub District, Tanjung Jabung Barat Regency, issued by Bupati Tanjung Jabung Barat.</li> <li>- Izin Usaha Perkebunan – <i>Surat Pendaftaran Usaha Perkebunan/SPUP</i> (Plantation Operational permit) No.187/ Mentanhut/VII/2000, dated 3 November 2000 (±4,759.20 ha).</li> <li>- <i>Izin Usaha Perkebunan Budidaya/IUP B</i> (Plantation operational permit) No.625, year 2008, dated 26 September 2008 (± 1,111 ha).</li> <li>- Forest area release through "<i>Surat Keputusan Menteri Kehutanan No.494/Kpts-II/1991 tentang Pelepasan areal hutan seluas 17,500 Ha terletak di Kelompok Hutan S. Lampisi-S. Palik-palik Kabupaten Dati II Tanjung Jabung dan Seluas 9,356 Ha terletak di Kelompok Hutan</i></li> </ul>	Complied

		<p><i>S. Kehidupan-S. Singoan, Kabupaten Batanghari, Provinsi Jambi untuk Usaha Budidaya perkebunan dengan pola PIR-TRANS atas nama PT. Inti Indosawit Subur” dated 7 August 1991.</i></p> <ul style="list-style-type: none"> <li>- Renewal HGU No.61/HGU/BPN/2005, dated 2 June 2005, approved by BPN (3,503.02 ha). Valid until 31 December 2027.</li> <li>- HGU No.82/HGU/BPN RI/2014, dated 15 May 2014 (1,053.34 ha), valid until 16 May 2049.</li> </ul> <p>Based on identification, document verification and interviews with stakeholders, that at PT IIS – Tungkal Ulu Estate and Mill, there are no customary land ownership upon the Unit of Certification area.</p> <p>If there is a land dispute, the company will use the procedure as stipulated in the Standard Operating Procedure (SOP) document no. AA-GL-5003.1-R2 regarding Land Conflict Management which was approved by management on 08 May 2015.</p> <p><b>Scheme Smallholder:</b></p> <p>During field observation and interview with sampled smallholders, obtained information there was no land dispute within smallholders’ area since the plantation developed. Smallholders land obtained based on government program “Transmigrasi” in early 1980’s, therefore all smallholders plot already have legal use rights.</p>	
<p><b>Criteria 4.8:</b> The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrated that they have legal customary, or user rights.</p>			
<p>4.8.1</p>	<p>Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.</p>	<p>PT IIS - Tungkal Ulu is a palm oil company that was developed in conjunction with the government's program in the development of nucleus - plasma oil palm plantations with the PIR-TRANS scheme since 1991. The company has shown land legal documents ranging from Permits for Release of Forest Areas, Location Permits to certificate of Hak Guna Usaha (HGU) which is currently part of the HGU extension period.</p>	<p>Complied</p>



	<p>- Minor compliance -</p>	<p>The land dispute between PT IIS and the people of Tanjung Paku Village has been re-checked in this surveillance audit and based on interview with all relevant stakeholder, observed that for the previous case was related to a land dispute with the people of Tanjung Paku Village covering an area of around 107 hectares. Until this audit (ASA2_1) was carried out, land disputes had been handled by the regional government, namely KESBANGPOL as a mediator in resolving them.</p> <p>Procedurally, PT IIS - Tungkal Ulu has carried out actions and treatments in accordance with established procedures, namely Standard Operating Procedures (SOP). No. AA-GL-5003.1-R2 concerning Handling Land Conflicts and also related regulations.</p> <p>PT IIS – Tungkal Ulu will respect and follow the conflict resolution process in accordance with applicable regulations and established procedures.</p> <p>PT IIS – Tungkal Ulu will respect and follow the conflict resolution process in accordance with applicable regulations and procedure that has been set.</p>	
<p>4.8.2</p>	<p><b>(C)</b> 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>- Critical (Major) compliance -</p>	<p>PT IIS - Tungkal Ulu is a palm oil company that was developed in conjunction with the government's program in the development of nucleus - plasma oil palm plantations with the PIR-TRANS scheme since 1991. The company has shown land legal documents ranging from Permits for Release of Forest Areas, Location Permits to certificate of Hak Guna Usaha (HGU) which is currently part of the HGU extension period.</p> <p>The land dispute between PT IIS and the people of Tanjung Paku Village has been re-checked in this surveillance audit and based on interview with all relevant stakeholder, observed that for the previous case was related to a land dispute with the people of Tanjung Paku Village covering an area of around 107 hectares, Until this audit (ASA2_1) was carried out, land disputes had been handled by the regional government, namely KESBANGPOL as a mediator in resolving them.</p> <p>Procedurally, PT IIS - Tungkal Ulu has carried out actions and treatments in accordance with established procedures, namely Standard Operating</p>	<p>Complied</p>

		<p>Procedures (SOP). No. AA-GL-5003.1-R2 concerning Handling Land Conflicts and also related regulations.</p> <p>PT IIS – Tungkal Ulu will respect and follow the conflict resolution process in accordance with applicable regulations and established procedures.</p> <p>PT IIS – Tungkal Ulu will respect and follow the conflict resolution process in accordance with applicable regulations and procedure that has been set.</p>	
<p>4.8.3</p>	<p>Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4).</p> <p>- Minor compliance -</p>	<p>The company has developed a land dispute resolution procedure in the form of Standard Operating Procedure (SOP) No. AA-GL-5003.1-RI concerning Land Conflict Management, which was approved by management on December 5, 2009 and has undergone revision I on August 22, 2011. In 2015 the company revised II Mechanism for handling conflicts as outlined in the Standard Operating Procedure (SOP). No. AA-GL-5003.1-R2 regarding Land Conflict Management which was approved by management on 08 May 2015.</p> <p>The mechanism has adjusted to the 2015 FPIC Guide for RSPO Member where in the SOP it has regulated the delivery of information, negotiations, measurement of common boundaries and others including the involvement of other related parties and parties whose land borders conflict lands.</p> <p>The land dispute between PT IIS and the people of Tanjung Paku Village has been re-checked in this surveillance audit and based on interview with all relevant stakeholder, observed that for the previous case was related to a land dispute with the people of Tanjung Paku Village covering an area of around 107 hectares, Until this audit (ASA2_1) was carried out, land disputes had been handled by the regional government, namely KESBANGPOL as a mediator in resolving them.</p> <p>Procedurally, PT IIS - Tungkal Ulu has carried out actions and treatments in accordance with established procedures, namely Standard Operating</p>	<p>Complied</p>

		<p>Procedures (SOP). No. AA-GL-5003.1-R2 concerning Handling Land Conflicts and also related regulations.</p> <p>PT IIS – Tungkal Ulu will respect and follow the conflict resolution process in accordance with applicable regulations and established procedures.</p> <p>In this land conflict resolution, there are no practices of forcible dispossession or relinquishment of rights, therefore the company uses this process through a process of justice for rights.</p>	
4.8.4	<p>For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable).</p> <p>- Minor compliance -</p>	<p>The land dispute between PT IIS and the people of Tanjung Paku Village has been re-checked in this surveillance audit and based on interview with all relevant stakeholder, observed that for the previous case was related to a land dispute with the people of Tanjung Paku Village covering an area of around 107 hectares, Until this audit (ASA2_1) was carried out, land disputes had been handled by the regional government, namely KESBANGPOL as a mediator in resolving them.</p> <p>Procedurally, PT IIS - Tungkal Ulu has carried out actions and treatments in accordance with established procedures, namely Standard Operating Procedures (SOP). No. AA-GL-5003.1-R2 concerning Handling Land Conflicts and also related regulations.</p> <p>PT IIS – Tungkal Ulu will respect and follow the conflict resolution process in accordance with applicable regulations and established procedures.</p>	Complied
<p><b>Principle 5: Support smallholder inclusion</b></p> <p>Include smallholders in RSPO supply chains and improve their livelihoods through fair and transparent partnerships.</p>			
<p><b>Criteria 5.1:</b> 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>- Minor compliance -</p>	<p>Based on interview with management representative during ASA2_1, 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>	Complied

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

		<p>During the ASA2_1 audit, Kebun Plasma Tungkal Ulu showed the FFB payment receipt period May 2023 in accordance with market price for the planting years in most of the KUD/smallholders are classified as over 25 years, so the price is lower than official FFB price, the price is following the market price. The official price of FFB from Dinas Perkebunan Province Jambi is only regulates up to the age of the plant 25 years. The lower FFB prices has been agreed by the smallholders, the calculation has considered the OER KER material balance for OP &gt; 25 years (bunch analysis), so that prices remain competitive.</p> <p>Sighted the payments record of KUD Karya Jaya, KUD Sari Bumi, KUD Sawit Mulia and KUD Karya Kita period May 2023.</p>	
5.1.2	<p><b>(C)</b> Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>Based on information gathered from the plasma manager and CSV staff the information of price was directly informed by the purchasing department to the respective suppliers through the short message application such as WhatsApp. During the field visit to the respective KUD (KUD Karya Jaya, KUD Sari Bumi, KUD Sawit Mulia and KUD Kary Kita) informed that price updating by board of KUD's board in office and also been seen the Price of FFB period May 2023 posted on the notice of Koperasi board.</p> <p>In addition, the price information for out growers or CSV also updated by purchasing department.</p>	Complied
5.1.3	<p><b>(C)</b> Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.</p> <p>- Critical (Major) compliance -</p>	<p>During this audit ASA2.1 has verified that the Management of PT Inti Indosawit Subur – Tungkal Ulu Plasma has committed to share the RSPO premium price in accordance with the agreement with their smallholder. Premium sharing is not distributed in cash money, instead in smallholder's empowerment activities aimed at increasing the competence and competitiveness of smallholders based on participatory suggest from the smallholders.</p>	Complied

		<p>During this audit obtained information that the premium sharing for Tungkal Ulu Plasma period 2021/2022 has been distributed, for example for example:</p> <ul style="list-style-type: none"> <li>- KUD Sari Bumi (Adipurwa Village), dated 14 March 2023, road material 8 trip IDR 10,000,000.</li> <li>- KUD Manunggal Jaya (Adipurwa Village), dated 14 March 2023, "Pondok Hujan" IDR 10,000,000.</li> <li>- KUD Pancamukti (Pinang Gading Village), dated 17 March 2023, road material 106m3, IDR 20,000,000.</li> <li>- KUD Sawit Mulia (Intan Jaya Villge), dated 24 March 2023, road material 107m3, IDR 20,000,000.</li> <li>- KUD Mukti Raharjo (Sungai Muluk Village), dated 29 May 2023, road material 55m3, IDR 19,800,000.</li> </ul> <p>For the FFB price has followed the prices that set by Dinas Perkebunan Kabupaten Tanjung Jabung Barat.</p>	
5.1.4	<p><b>(C)</b> Evidences is available that all parties, including women and independent representative organization assisting smallholders where requested, are involved in the decision making processes and understand the contracts. These include involving finance, loans/credits, and re-payments through FFB price reductions for replanting and/or, other support mechanisms where applicable.</p> <p>- Critical (Major) compliance -</p>	<p>Based on document review and interview to the management during ASA2_1, the smallholder's member of Tungkal Ulu Plasma originated from government transmigration program on 1990 – 1991. Mostly from East Java, West Java and local area (Jambi Province). Based on information obtained during the onsite audit known that some of smallholders' member were women. The annual meeting of KUD for period Y2023 through Rapat Anggota Tahunan (RAT) always invited all members which is some women. All the decision made was involved the smallholder members, including women members.</p> <p>Document verified for example: RAT KUD Karya Jaya on 31 March 2023 was attended by 123 members including 12 women members, KUD Sari Bumi on 10 June 2023 was attended by 119 members including 10 women members.</p>	Complied

<p>5.1.5</p>	<p>Contracts are fair, legal and transparent and have an agreed timeframe.          - Minor compliance -</p>	<p>All smallholders which registered as supply bases to Tungkal Ulu POM have agreement with PT. Inti Indosawit Subur – Tungkal Ulu. The timeframe of the contract is 1 cycle period (25 years) since first planting. For the renewal contract has been shown during audit and the terms of contract been better then 1<sup>st</sup> cycle which can improved the livelihood of the smallholders.          Through the interview with FFB supplier (supplied to Tungkal Ulu POM) obtained information that the FFB price only updated if any changes. However, the FFB payments maximum 3 days after the mill received the FFB (according to the contract). There is no dispute related to FFB payments so far.          Based on document all contracts are written in Bahasa Indonesia.</p>	<p>Complied</p>
<p>5.1.6</p>	<p><b>(C)</b> Agreed payments are made in a timely manner and receipts specifying price, weigh, deductions and amount paid are given.          - Critical (Major) compliance -</p>	<p>Smallholders received the daily and monthly report for FFB’s that deliver to Tungkal Ulu POM. Price, weigh, deduction and amount paid are clearly described within the document. Payment to smallholders in monthly basis. Through the interview with FFB supplier (supplied to Tungkal Ulu POM) obtained information that the FFB price only updated if any changes. However, the FFB payments maximum 3 days after the mill received the FFB (according to the contract). Document review for FFB payment for KUD Karya Jaya, KUD Sari Bumi, KUD Sawit Mulia and KUD Karya Kita on 31 May 2023 was shown that the FFB payment are in accordance with the FFB price the company has informed to KUD Karya Jaya, KUD Sari Bumi, KUD Sawit Mulia and KUD Karya Kita, the FFB prices is IDR 1,843 /kg.          There is no dispute related to FFB payments so far.</p>	<p>Complied</p>
<p>5.1.7</p>	<p>Weighing equipment is verified by an independent third party on a regular basis.          - Minor compliance -</p>	<p>Weighbridge in Tungkal Ulu POM is verified by government agency in annual basis. Latest verification was performed on 31 March 2023, based on “Surat Keterangan Hasil Pengujian” (calibration certificate):          - No.DG.02.03/414/DPP-III/SKHP/2023 for Avery Weigh Tronix; model ZM510; S/N 182950654; capacity 50,000 kg.</p>	<p>Complied</p>

		<p>- No.DG.02.03/413/DPP-III/SKHP/2023 for Avery Weigh Tronix; model ZM510; S/N 212051089; capacity 50,000 kg.</p> <p>Certificates issued by "UPT Metrologi Legal – Dinas Perdagangan dan Perindustrian, Pemerintah Kota Jambi", valid until March 2024.</p>	
5.1.8	<p>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> <p>- Minor compliance -</p>	<p>Based on review of agreement during ASA2.1, 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&amp;C requirements.</p> <p>For independent Smallholder, support is given in form of CSV (Create Share Value). Member of CSV which have cooperation with the company for example is Perkumpulan Kotani Mandiri Bersama (PKMB). Organization have provided assistance in obtaining permits of STDB (Surat Tanda Datar Budidaya) and SPPL (<i>Surat Pernyataan Pengelolaan Lingkungan</i>) at the local Office. Form of support is the company give coaching to the independent smallholder related good agriculture practices, organisation and administration. Until ASA2.1, CSV is still carried out assistances for obtaining STDB and SPPL.</p>	Complied
5.1.9	<p><b>(C)</b> The unit of certification has a grievance mechanism for smallholders, and all grievances raised are dealt with in a timely manner.</p> <p>- Critical (Major) compliance -</p>	<p>Based on document verification and information from agencies and stakeholders at the time of the interview, PT IIS-Tungkal Ulu has several dispute resolution procedures and up to this surveillance there have been no changes and they are still consistently applied up to now, i.e:</p> <ol style="list-style-type: none"> <li>a. Standard Operating Procedure (SOP) No. AA-GL-5003.1-R2 regarding Land Conflict Management which was approved by management on 08 May 2015.</li> <li>b. SOP Penanganan Keluhan Masyarakat No: AA-GL-510.1-R0, dated 1 January 2013, stipulated that: <ul style="list-style-type: none"> <li><i>4.1 Reporting Public Complaints</i></li> <li><i>4.1.1 General Scope: "Procedures ... for handling complaints from Concerned Parties including organizations, people, groups or</i></li> </ul> </li> </ol>	Complied

		<p><i>institutions ...". In order for the Company to respond appropriately to the Parties' complaints in order to be identified, anonymous questions or complaints (without identity / cannot be traced by their identity) cannot be accepted. "</i></p> <p><i>4.2 Procedure for Handling / Resolving Community Complaints</i></p> <p><i>4.2.5 "This form identifies the person or organization that submitted the complaint, along with the basis of the complaint and the background of the acknowledgment (detailed description of the incident, name of the Party involved, the specific time when the event was the reason for the complaint and the basis of the complaint).</i></p> <p><i>4.2.12 "... The company will endeavour to resolve complaints within 15 working days".</i></p> <p>c. The mechanism used for handling employee complaints is as outlined in the SOP document No. AA-HR-308.5-R0, Rev 0 (SOP for Submission and Resolution of Employee Complaints) signed by Management on December 11, 2009. In the SOP, the procedures for submitting and handling employee complaints have been described, starting from how to submit complaints, the time for giving responses, parties who is responsible for responding to every employee complaint and documenting every employee complaint.</p> <p>Resolves disputes system which developed by unit of certification has follows the RSPO Policy on respect for Human Right Defender (HRD) stated in the Human Rights Policy dated 1 December 2019 signed by Managing Director. Separately, the company has also had a policy related a Human Rights Defender, which is stated in the Internal Memorandum No. 049/HO/MEMO/INT/03/20 from Head Operational on 20 March 2020: "Protection against the reporters/defenders of human rights defender from acts of revenge, intimidation and harassment.</p> <p>The external grievances and complaint handling was stipulated as per "Mekanisme Keluhan" which provided in the Website of Asian Agri and</p>	
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		<p>can be accessed by all stakeholder of Asian Agri at <a href="https://www.asianagri.com/id/panel-keberlanjutan/keluhan-pengaduan">https://www.asianagri.com/id/panel-keberlanjutan/keluhan-pengaduan</a></p> <p>Asian Agri stakeholders include but are not limited to the Government, farmers, suppliers, vendors, academics, NGOs, media, etc., provided different complaint channels to report their complaints/findings. Reporters can submit complaints and information related to business violations, corruption, harassment, criminal acts, the environment, and others.</p> <p>Based on document review and interview to the sample members during ASA2-1, it was known that there is no complaint by the smallholders raised since May 2022 until May 2023.</p>	
<p><b>Criteria 5.2:</b> The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.</p>			
<p>5.2.1</p>	<p>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> <p>- Minor compliance -</p>	<p>The certification unit - PT IIS - Tungkal Ulu consulted with existing scheme smallholders and also some independent farmers to assess their need for support to improve their livelihoods and their interest in RSPO certification by circulating a letter of agreement to continue the replanting program with the company. For groups of small farmers who have not replanted, the company offers a TKKS mulching program to be implemented on farmers' land through submitting proposals.</p> <p>Several activities have been carried out to provide knowledge about RSPO certification through training, for example:</p> <ul style="list-style-type: none"> <li>- 20 March 2023 held training on pest and plant disease control which was attended by 30 participating farmers.</li> <li>- On 4 May 2023, held training on harvesting activities and pruning care which was attended by 30 farmers.</li> <li>- On 3 May 2023, held training on fertilizer application and weed control without using paraquat herbicide attended by 60 farmers.</li> </ul> <p>Based on field observations and interviews with village heads around the plantation (PT IIS), that: small farmers and/or village residents who also own land and oil palm plantations around plantations owned by PT IIS-</p>	<p>Complied</p>

		<p>Tungkal Ulu, are also given free access can cross or collect grass in plantation areas to use as livestock.</p> <p><b>Scheme smallholder:</b></p> <p>Related replanting activities, in 2018 unit of certification disseminate to scheme smallholder's members for agree/disagree to continue partnership program agreement through BPDPKS government assistance funding. The Replanting Cooperation Agreement has been made and agreed in 2019 - 2021, including:</p> <ul style="list-style-type: none"> <li>- Cooperation Agreement between PT Inti Indosawit Subur and the KUD Sawit Mulia regarding <i>Replanting/Peremajaan dan pengelolaan Kelapa Sawit Dengan Pola Kemitraan Pendanaan BPDPKS dan Kredit Perbankan di Desa Intan Jaya Kecamatan Muara Papalik Kabupaten Tanjung Jabung Barat</i>, No. 09/KUD-SM/V/2021 &amp; No. 04/LEG-IIS/V/21 dated 29 May 2021.</li> <li>- Cooperation Agreement between PT Inti Indosawit Subur and the KUD Karya Jaya regarding <i>Replanting/Peremajaan dan pengelolaan Kelapa Sawit Dengan Pola Kemitraan Pendanaan BPDPKS dan Kredit Perbankan di Desa Bukit Harapan Kecamatan Merlung, Kabupaten Tanjung Jabung Barat</i>, No. 110/KUD-KJ/BH/2019 &amp; No. 02/SPJ/LEG-IIS/X/19 dated 22 November 2019.</li> </ul> <p>Document sample of "Surat Pernyataan Persetujuan Replanting", such as:  At KUD Karya Jaya Hampan 7 which agreed to continue the program as below:</p> <ol style="list-style-type: none"> <li>1. Mr. Paldi (ID SH: 1279), dated 22 November 2019.</li> <li>2. Mr. Masidi (ID SH: 1301), dated 22 November 2019.</li> <li>3. Mr. Tumiyo (ID SH: 1278), dated 22 November 2019.</li> </ol>	
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		At KUD Sawit Mulya Hamparan 4 which agreed to continue the program as below 1. Mrs. Suhati (ID SH: 3789), dated 29 May 2021. 2. Mr. Surip (ID SH: 3715), dated 29 May 2021. 3. Mr. Harlianto (ID SH: 3784), date 29 May 2021	
5.2.2	The unit of certification develops and implements livelihood improvement programmes, including at least capacity building to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder). - Minor compliance -	Consistently, the PT IIS - Tungkal Ulu Group certification unit has been developing and implementing livelihood improvement programs, such as: - 20 March 2023 held training on pest and plant disease control which was attended by 30 participating farmers. - On 4 May 2023, held training on harvesting activities and pruning care which was attended by 30 farmers. - On 3 May 2023, held training on fertilizer application and weed control without using paraquat herbicide attended by 60 farmers.	Complied
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	Unit of certification have specific program to promote legally FFB and BMP management to independent smallholders namely Core Shared Value (CSV) program. This program aims to produce legal FFB and proposed for certification. The front yard land of each smallholder which under scheme (outside certification scope) are proposed to form organization and being directed to proceed ISH certification.  During the ASA2.1 audit, the program is still in progress for area mapping and obtaining of STDB and SPPL.	Complied
5.2.4	<b>(C)</b> Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	Unit of certification has assigned chemical weeding team (Tim Unit Semprot/TUS) in each estate/unit to handling chemical weeding activity. The team member originated from own workers (for own estate) and local communities (for smallholder). They regularly attended training on pesticide handling that conducted by the pesticide supplier in collaboration with local pesticide committee.  Based on document review and interview with random pesticide applicator known that they were attending the last training on pesticide handling on	Complied

		3 April 2023 and attended by 63 smallholders. 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.	
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme. - Minor compliance -	Unit of certification regularly reviews and publicly reports on the progress of the smallholder support program by access website <a href="https://www.asianagri.com/id/panel-keberlanjutan/laporankeberlanjutan">https://www.asianagri.com/id/panel-keberlanjutan/laporankeberlanjutan</a> . That document is publicly available. Plasma manager Tungkal Ulu 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"> <li>Assisted the KUD's to achieve the production and upkeep target. Until this audit, plasma area has been achieved 5% above the target.</li> <li>Assisting the KUD's in replanting program. Until this audit, there is a record of approval by smallholder member in some KUD's. PT Inti Indosawit Subur as agreed to be bank guarantor for the financial scheme of replanting.</li> </ul>	Complied
<p><b>Principle 6: respect workers' rights and conditions</b>  Protect workers' rights and ensure safe and decent working conditions.</p>			
<p><b>Criteria 6.1: Any form of discrimination is prohibited.</b></p>			
6.1.1	<b>(C)</b> 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. - Critical (Major) compliance -	Until this audit was carried out, there were no changes to the company's policies regarding non-discrimination and equal opportunity. PT Inti Indosawit Subur – Tungkal Ulu has established a Company Policy based on the "Company Policy" which was signed by the President Director on 1 December 2014. In point 13 it is stated: "The Company treats employees fairly, both in terms of acceptance, assessment, working conditions and environment, and representation without regard to race, ethnicity, caste, national origin, religion/belief, disability, gender, sexual orientation, trade union membership, political affiliation and/or age."	Complied

		<p>This policy has been communicated to all employees and placed on a notice board in a public and easily accessible place.</p> <ul style="list-style-type: none"> <li>▪ In 2022, socialization was held on 18 April 2022, which was attended by 19 Tungkal Ulu Estate employees.</li> <li>▪ On 11 April 2022 socialization was carried out at the Tungkal Ulu POM which was attended by 14 employees.</li> </ul> <p>In 2023 the socialization has performed:</p> <ul style="list-style-type: none"> <li>▪ On 21-22 February 2023 attended by 29 participants from Mill</li> <li>▪ On 25-27 January 2023 which attended by 34 participants form Tungkal Ulu Estate</li> <li>▪ Also dissemination to contractor and supplier on 22 May 2023 attended by 7 contractors and supplier and socialization was donducted on 10 March 2023 attended by 14 contrctors and supplier as well.</li> </ul> <p>In the employee recruitment process, PT Inti Indosawit Subur – Tungkal Ulu has an SOP for employee recruitment and there have been no changes since the previous audit, i.e SOP: AA-HR-305.2-R0 dated 1 February 2009 concerning "<i>Penerimaan Karyawan Baru</i>" (Employee Recruitment and Selection), The company will accept new employees based on abilities and qualifications. This policy has been communicated to workers. The policy describes the organization as recognizing and respecting the rights of local, migrant or urban workers.</p> <p>Workers who registered in Mill and Estate was stated that all workers came from different backgrounds (race, religion, gender, etc.). Ethnic diversity of workers and during interviews with workers, no discrimination was identified based on religion, ethnicity, gender. No evidence of discrimination was found during the audit.</p>	
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		<p>The company provides workers with work equipment that is relevant to the nature of the work carried out, this is has mention in the PKB for the period 2023-2025 [Article 15] concerning Work Equipment, Occupational Safety and Health.</p> <p>Based on the Employee List as of May 2023, which proves that the company does not discriminate in any form, employees are given the opportunity to work regardless of ethnicity, religion, origin, and gender.</p> <p>List of workers: Workers at PT IIS-Tungkal Ulu for the period May 2023, consisting of several ethnic groups: Malay, Batak, Javanese, Lombok, Minang, Nias, and others. Consists of 2 religions: 82% Islam and 18% Christianity and consists of 30% female workers and 70% male workers.</p>	
<p>6.1.2</p>	<p><b>(C)</b> Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against. Evidence includes migrant workers non-payment of recruitment fees.</p> <p>- Critical (Major) compliance -</p>	<p>In the employee recruitment process, PT Inti Indosawit Subur – Tungkal Ulu has an SOP for employee recruitment and there have been no changes since the previous audit, i.e SOP: AA-HR-305.2-R0 dated 1 February 2009 concerning "<i>Penerimaan Karyawan Baru</i>" (Employee Recruitment and Selection), The company will accept new employees based on abilities and qualifications. This policy has been communicated to workers. The policy describes the organization as recognizing and respecting the rights of local, migrant or urban workers.</p> <p>Workers who registered in Mill and Estate was stated that all workers came from different backgrounds (race, religion, gender, etc.). Ethnic diversity of workers and during interviews with workers, no discrimination was identified based on religion, ethnicity, gender. No evidence of discrimination was found during the audit.</p> <p>The company provides workers with work equipment that is relevant to the nature of the work carried out, this is has mention in the PKB for the period 2023-2025 [Article 15] concerning Work Equipment, Occupational Safety and Health.</p>	<p>Complied</p>

		<p>Based on the Employee List as of May 2023, which proves that the company does not discriminate in any form, employees are given the opportunity to work regardless of ethnicity, religion, origin, and gender.</p> <p>List of workers: Workers at PT IIS-Tungkal Ulu for the period May 2023, consisting of several ethnic groups: Malay, Batak, Javanese, Lombok, Minang, Nias, and others. Consists of 2 religions: 82% Islam and 18% Christianity and consists of 30% female workers and 70% male workers.</p> <p>Based on interviews with workers and management of PT IIS-Tungkal Ulu (Mill and Estate), there are no migrant workers. In the recruitment process for all employees/workers, there is no payment (recruitment fee) charged to prospective workers.</p>	
<p>6.1.3</p>	<p>The unit of certification demonstrates that the recruitment selection, hiring access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p> <p>- Minor compliance -</p>	<p>Implementation of Non-Discrimination and Equal Opportunities:</p> <ul style="list-style-type: none"> <li>- In Semester I 2022, 21 harvesters have been appointed PHL harvesters to become SKUH based on Memorandum No.0176-026/HR-RO3/MEMO/SK/06/2022 dated 23 June 2022.</li> <li>- In Semester II of 2022; 11 harvesters have been promoted from PHL harvesters to SKUH (Permanent), based on Memorandum from RH Plantation 3 No. 0279-0293/HR-RO3/MEMO/SK/10/2022 dated 14 October 2022.</li> <li>- In Semester I/2023, 17 harvesters have been promoted from PHL to SKUH (Permanent), based on Memorandum from RH Plantation 3 No. 139-158/HR-RO3/MEMO/SK/06/2023 dated 21 June 2023.</li> </ul> <p>Based on the promotion of workers as mentioned above, their skills, abilities, quality, and health fitness have been tested and meet the requirements for promotion. Before a promotion is carried out, the relevant management must first assess attendance (discipline) and harvester output (productivity) and health checking by the clinic from Estate as well.</p> <p><b>Scheme Smallholders:</b></p>	<p>Complied</p>

**RSPO P&C Public Summary Report**  
**Revision 14 (Aug 2022)**

		Based on document sampled verification at (KUD Karya Kita, KUD Sawit Mulya, KUD Karya Jaya, and KUD Sari Bumi), that most of the farmers are managed their land independently. All the workers are considered as casual workers. The workers are hired based on verbal agreement related to rate per piece of work, payment system, working tool provision, etc. No work performed based on debt bond.	
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>- Minor compliance -</p>	<p>The certification unit - PT IIS Tungkal Ulu Group prohibits pregnant or breastfeeding women from spraying chemicals. To carry out mitigation, plantations carry out monthly pregnancy tests. So, this pregnancy check is not intended to discriminate against workers but is a check that must be carried out on female workers who work using chemicals so that if there are pregnant female workers they can be transferred to work (which does not come into contact with chemicals) temporarily.</p> <p>Plantation management notes that spraying is not carried out by pregnant or breastfeeding women. Female workers voluntarily carry out their own menstrual cycle tests and notify the Polyclinic for review by nurses and recording every month. Pregnancy checks were carried out based on the Minutes of PT IIS- Kebun Tungkal Ulu Pregnancy Tests on 15 May 2023 on 13 female workers from 7 foremen or 66 female workers, while the results of the checks were that all of these workers were declared negative.</p>	Complied
6.1.5	<p><b>(C)</b> 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>- Critical (Major) compliance -</p>	<p>PT Inti Indosawit Subur – Tungkal Ulu has formed a Gender Committee at the Tungkal Ulu Estate and Mill. The gender committee consisting of representatives from all units in the Tungkal Ulu Group plays a role in: overcoming problems related to women's rights and providing counseling for female workers who experience acts of violence and sexual harassment as well as other problems related to female workers.</p> <p>In 2023, the Gender Committee's Work Program has been determined, including the issues that will be discussed at the meeting. The program has not changed much from the previous year (because this activity is a routine activity), including:</p>	Complied



		<ol style="list-style-type: none"> <li>1. Improving maternal and child health through Posyandu activities, immunizations and vitamin supplements.</li> <li>2. Hold regular gender committee meetings at least every 4 months</li> <li>3. Providing additional food (during Posyandu)</li> <li>4. Sports activities for employees</li> <li>5. Environmental cleanliness in residential areas</li> <li>6. Healthy housing assessment for employees</li> <li>7. Religious activity</li> </ol> <p>The last meeting held by the chairman of the gender committee with management was on 15 June 2023 with a discussion agenda related to complaints and protection of female workers within the company. This meeting was attended by 11 representatives of female workers and PT IIS management (plantations and Tungkal Ulu POM)</p> <p>Based on interviews with the chairman of the Gender Committee and a sample of female workers, awareness of issues of concern and ways to overcome them is carried out consistently. Such as: religious meetings at mosques, churches, or weekly meetings at complexes. It was also stated that until this time, there was no cases of harassment or violence against female workers</p>	
6.1.6	<p>There is evidence of equal pay for the same work scope.</p> <p>- Minor compliance -</p>	<p>The company consistently and complies with statutory regulations, that workers' wages are based on Jambi Governor's Decree No. 1072/KEP.GUB/DISNAKERTRANS-3.3/2022 dated 7 December 2022, regarding Determination of Tanjung Jabung Barat Regency Minimum Wage in 2023; amounting to IDR 3,002,284.08 per month.</p> <p>The HRD Department (HRD Manager RO3) also issued Memorandum 065/HR-RO3/MEMO/05/2023 on 2 May 2022 regarding wages for 2023 amounting to IDR 3,002,284.08 per month (25 Working Days) or the equivalent of IDR 120,091.36 per day.</p> <p>The company also provides rice allowances to its workers, namely 15 kg/month for each worker, 9 kg/month for the worker's wife, and 7.5</p>	Complied

		<p>kg/month for the worker's children (maximum 3 children). Rice price in August 2021 IDR 9,500/kg.</p> <p>The salary scale structure for the 2023 period for all levels of workers has been shown during the audit, this structure is based on Jambi Governor's Decree No. 1072/KEP.GUB/DISNAKERTRANS-3.3/2022 dated 7 December 2022.</p> <p>The company has provided employees with salary certificates/slips, salary slips containing basic salary, allowances, premiums, employee health insurance (BPJS Employment and Health) and deductions.</p> <p>Based on the document review during ASA2_1, it can be seen that the company has provided equivalent wages/salaries for the same scope of work, including in-kind benefits.</p> <p>Taken as an example of salaries/pay slips for the period June 2022 for Tungkal Ulu Estate and Tungkal Ulu Mill workers. Based on a sample salary slip, the worker's wage per day is IDR 107,957.63 and is in accordance with the 2022 wage determination decision from Jambi Governor's Decree No. 1072/KEP.GUB/DISNAKERTRANS-3.3/2022 dated 7 December 2022; regarding: "Determination of the 2023 Jambi Province Minimum Wage".</p> <p><b>Scheme smallholder:</b></p> <p>KUD workers are paid a daily wage and are only paid when they have worked. However, individual members have adjusted their workers' salaries by referring to government regulations. The wages given each month are calculated based on the tonnage of FFB harvested per rotation, which is IDR 150,000/ton FFB, done 2-3 times to reach 1 ton. Based on verification of freelance worker wage data in Tungkal Ulu Plasma, it shows that these wages are in accordance with Jambi Province regional government regulations.</p>	
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<p><b>Criteria 6.2:</b> Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).</p>		
<p>6.2.1</p>	<p><b>(C)</b> 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>- Critical (Major) compliance -</p>	<p>The company consistently and complies with statutory regulations, that workers' wages are based on Jambi Governor's Decree No. 1072/KEP.GUB/DISNAKERTRANS-3.3/2022 dated 7 December 2022, regarding Determination of Tanjung Jabung Barat Regency Minimum Wage in 2023; amounting to IDR 3,002,284.08 per month.</p> <p>The HRD Department (HRD Manager RO3) also issued Memorandum 065/HR-RO3/MEMO/05/2023 on 2 May 2022 regarding wages for 2023 amounting to IDR 3,002,284.08 per month (25 Working Days) or the equivalent of IDR 120,091.36 per day.</p> <p>Wage payments at PT IIS-Tungkal Ulu Group are made using bank transfer system to all workers on the 1st-5th of the current month, who have previously been given salary slips. A pay slip is a detail of a worker's wage payment which includes basic salary, allowances, overtime pay, health and employment insurance benefits, premiums and deductions from health and employment insurance contributions.</p> <p>The following are several verification documents for payment of wages of May 2023, such as:</p> <ul style="list-style-type: none"> <li>- Salary Receipt on behalf of Id* Hut*ba*at as Upkeep Worker (spraying), working day 20, basic salary IDR 2,401,827, salary rappel IDR 704,244, premium IDR 720,000 subtotal IDR 3,826,071 deduction; BPJS Ketenagakerjaan IDR 196,349, BPJS Kesehatan IDR 180,137, subtotal IDR 376,486, Net salary IDR 3,449,585.</li> <li>- Salary Receipt on behalf of Ro*an*din as harvester, working day 25, basic salary IDR 3,002,284, salary rappel IDR 1,523,340, premium IDR 720,000 subtotal IDR 5,322,531 deduction; BPJS Ketenagakerjaan IDR 196,349, BPJS Kesehatan IDR 180,137, subtotal IDR 376,486, Net salary IDR 4,946,045.</li> <li>- Salary Receipt on behalf of Kr*sm*n as Operator, working day 25,</li> </ul>

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		<p>basic salary IDR 3,002,284, salary rappel IDR 796,907, premium IDR 1,858,034 subtotal IDR 5,657,225 deduction; BPJS Ketenagakerjaan IDR 196,349, BPJS Kesehatan IDR 180,137, subtotal IDR 376,486, Net salary IDR 5,529,552.</p> <p><i>Note: wage adjustments to the minimum wage Y2023 have ben given at payroll at the end of May 2023 (for period January – April 2023).</i></p> <p>Based on the verification of the salary slip document above, PT IIS – Tungkal Ulu Group has implemented wage payments in accordance with applicable regulations and laws; Jambi Governor's Decree No. 1072/KEP.GUB/DISNAKERTRANS-3.3/2022 dated 7 December 2022, regarding Determination of Tanjung Jabung Barat Regency Minimum Wage in 2023, UU no. 11 of 2020 and PERPU no. 6 of 2023; regarding UU Cipta Kerja and Peraturan Pemerintah no. 36 of 2021; about Wages.</p>	
6.2.2	<p><b>(C)</b> 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>- Critical (Major) compliance -</p>	<p>The employment contract and details of payment and terms of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday rights, maternity leave, reasons for dismissal, notice period, etc.) are available in the Collective Labor Agreement (PKB) for the year period 2023-2025. This PKB has been registered at the Tanjung Jabung Barat Regency Manpower Service with no. 565/68/Naker/2023 dated 9 January 2023. Employment contract has been verified during ASA2_1 for example: Surat Perjanjian Kerja/Work Agreement Letter No. 026/SPK/PTU/III/2023 dated 24 February 2023 on behalf Alb*rt* - Operator – Mill; Surat Perjanjian Kerja/Work Agreement Letter No. 001/SPK/PTU/II/2023 dated 9 February 2023 on behalf De*are* - Helper; Surat Perjanjian Kerja/Work Agreement Letter No. 009/SPK/PTU/III/2023 dated 14 March 2023 on behalf Hu*r* - Upkeep Worker.</p> <p>Determination of wages (including allowances and other allowances), working hours (including working hours and overtime pay) and working days are regulated in Article V; Wages - Wages, which explains:</p> <p>A. Permanent workers are given wages whose amount is determined</p>	Complied

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		<p>by the employer with conditions that are not lower than government regulations.</p> <p>B. Certain permanent workers are given wages (Basic Salary and Rice) according to their class/level status, the value of which is determined by the employer with conditions that are not lower than government regulations.</p> <p>C. Workers still receive additional wages (UMP/UMSK) and/or attendance incentives which are further regulated in separate provisions.</p> <p>The rice allowance given to workers is 15 kg/month for each worker, 9 kg/month for the wife and 7.5 kg/month for the worker's children (maximum 3 children).</p> <p>Provisions regarding holidays and leave (both maternity leave and menstrual leave) are regulated in Article VIII concerning Non-Working Days; including: absenteeism, rest days in a week, official holidays, annual leave, maternity leave and others.</p> <p>Meanwhile, for daily workers, the company has established an Employment Contract for daily workers which is written in Indonesian, so that it can be understood by all parties. The Daily Worker Agreement explains the rights and obligations of workers, including: wages, social security (BPJS Employment and BPJS Health), facilities and work tools.</p> <p>Based on the verification of wage documents for the May 2023 period above (6.1.6 &amp; 6.2.1), the application of wages at PT IIS is in accordance with statutory regulations.</p> <p>Based on the verification of the salary slip document above, PT IIS – Tungkal Ulu Group has implemented wage payments in accordance with applicable regulations and laws; Jambi Governor's Decree No. 1072/KEP.GUB/DISNAKERTRANS-3.3/2022 dated 7 December 2022, regarding Determination of Tanjung Jabung Barat Regency Minimum</p>	
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		<p>Wage in 2023, UU no. 11 of 2020 and PERPU no. 6 of 2023; regarding UU Cipta Kerja and Peraturan Pemerintah no. 36 of 2021; about Wages.</p>	
<p>6.2.3</p>	<p><b>(C)</b> 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>- Critical (Major) compliance -</p>	<p>Determination of wages (including benefits and other benefits), working hours (including hours and overtime pay) and working days have been regulated in the Collective Labor Agreement (PKB periode 2023-2025) Article V; Upah – Wages.</p> <p>The Company paid the wages of employees in 2023 is by minimum wage based on Decree of Governor of Jambi 1072/KEP.GUB/DISNAKERTRANS-3.3/2022 dated 7 December 2022; regarding: "<i>Penetapan Upah Minimum Kabupaten Tanjung Jabung Barat Propinsi Jambi Tahun 2023</i>".</p> <p>Working hour is determined 40 hour per week (Monday – Saturday) with 7 hour per day.</p> <p>Document verification:</p> <p>Overtime</p> <ul style="list-style-type: none"> <li>- Overtime Order dated 2 May 2023 for the Tungkal Ulu Estate, overtime on behalf of Siswo (workshop), 3 hours overtime (12.00-16.00) for repair and replacement of tractor bearings in the workshop.</li> <li>- Overtime Order dated 4 May 2023 for the Tungkal Ulu Estate, overtime on behalf of Yogie Tirta (workshop), 3 hours overtime (12.00-16.00) for repair and replacement of tractor dynamo starter in the workshop.</li> <li>- Recapitulation of Overtime Hours of Tungkal Ulu Estate for the May 2023 period.</li> <li>- Overtime Order dated 24 March 2023 for Tungkal Ulu Mill, overtime on behalf of Rusli (Security officer), 1 hour's overtime for control in security POS 04.</li> </ul> <p>Leave:</p>	<p>Complied</p>

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		<ul style="list-style-type: none"> <li>- Application for annual leave in the name of Sukedi (NP: 00039) position: mature upkeep, proposed leave on 5 - 7 June 2023.</li> <li>- Application for annual leave in the name of Sukedi (NP: 00039) position: processing operator, proposed leave on 11- 12 July 2023.</li> </ul> <p>Based on the overtime pay verification above, PT IIS has implemented overtime pay in accordance with applicable laws and regulations.</p> <p>Based on the verification of the salary slip document above, PT IIS – Tungkal Ulu Group has implemented wage payments in accordance with applicable regulations and laws; Jambi Governor's Decree No. 1072/KEP.GUB/DISNAKERTRANS-3.3/2022 dated 7 December 2022, regarding Determination of Tanjung Jabung Barat Regency Minimum Wage in 2023, UU no. 11 of 2020 and PERPU no. 6 of 2023; regarding UU Cipta Kerja and Peraturan Pemerintah no. 36 of 2021; about Wages.</p>	
6.2.4	<p><b>(C)</b> 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>- Critical (Major) compliance -</p>	<p>The company has provided adequate facilities for the workers, including the basic need such as electricity and water. Detail of company facilities for employees are as follows:</p> <p>PT Inti Indosawit Subur – Tungkal Ulu has provided adequate housing with electrical and clean water supply, medical clinic, sport facilities, religious facilities, education facilities and other amenities. Based on field inspection, the facilities found to be in good condition. The company has prepared facilities for their workers.</p> <p>Record seen:</p> <p>There were no changes related to data dan layout of Public Facilities in Tungkal Ulu Estate and Mill year 2023 (there was no change form 2021), such as:</p> <p><b>Tungkal Ulu POM</b></p> <ul style="list-style-type: none"> <li>- Housing B/CM (2 units)</li> <li>- Housing C (5 units)</li> </ul>	Complied

		<ul style="list-style-type: none"> <li>- Housing E (61 units)</li> <li>- Water pump (1 unit)</li> <li>- Water reservoir (2 units)</li> </ul> <p><b>Tungkal Ulu Estate</b></p> <ul style="list-style-type: none"> <li>- Housing; staff (20 units), type D1(28 units), type E1 (187 units).</li> <li>- Kindergarten (1 unit).</li> <li>- Clinic (2 units).</li> <li>- Mosque (3 units).</li> <li>- Church (1 unit).</li> <li>- School bus (4 units).</li> <li>- Ambulance (1 unit).</li> <li>- <i>Koperasi</i> (1 unit).</li> <li>- Employee hall (1 unit).</li> <li>- Sport facilities (football, volleyball, tennis, badminton).</li> </ul> <p>The company annually evaluates the condition of employee housing using the Employee Home Condition Census Recapitulation Form, last conducted in January 2023. Based on interview with the employees who live in the employee housing, that there are no issues related to the housing. Whenever there is damage to employee housing, the company always responds and follows up on the damage and repairs it.</p> <p>For the smallholder scheme, there is no employee housing, because the use of labor in the smallholder scheme is to use local village communities that already have housing in the village.</p>	
6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p>Company is able to demonstrate effort in providing access to adequate, sufficient and affordable food: provision of rice allowance – aside from monthly salary to all eligible workers, cooperative organization for employee providing basic food necessities (<i>Koperasi Jaya Abadi</i>).</p>	Complied



		<p>The company also provides access to sellers of vegetables and food needs to be able to enter the PT IIS-Tungkal Ulu Group area every morning, so that workers can more easily get their daily food needs. Once every month at the time of the employee's payday, the employee housing also opens a temporary market which is held on the 5th-6th of each month.</p> <p>Based on interviews with several employees, that to get food needs every day there is no difficulty, because the company has provided this access (Koperasi Jaya Abadi, small shops in housing that are obtained by the company) as well as "Penjual sayuran keliling" who can enter every morning at employee housing.</p> <p><b>Scheme Smallholders:</b></p> <p>The farmer members are a developed transmigration village. Provision of food can be obtained from existing markets in the village. Based on the results of field visits to the sample villages indicate that in the village was available markets and small shops that provide basic necessities.</p>	
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>- Minor compliance -</p>	<p>Company has state about the wages for workers base on Decree of Governor of Jambi SK No. 1072/KEP.GUB/DISNAKERTRANS-3.3/2022 dated 7 December 2022; regarding Determination of Tanjung Jabung Barat Regency Minimum Wage in 2023; amounting to IDR 3,002,284.08 per month.</p> <p>The HRD Department (HRD Manager RO3) also issued Memorandum 065/HR-RO3/MEMO/05/2023 on 2 May 2022 regarding wages for 2023 amounting to IDR 3,002,284.08 per month (25 Working Days) or the equivalent of IDR 120,091.36 per day.</p> <p>The company has also given rice allowance for the workers, which is 15 kg/month for each worker, 9 kg/month for wife of workers and 7.5 kg/month for child of workers (maximum 3 children). The price of rice in August 2021 is IDR 9,500/kg.</p>	Complied

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		<p>The salary scale structure for the 2023 period for all levels of workers has been shown during the audit, this structure is based on Jambi Governor's Decree No. 1072/KEP.GUB/DISNAKERTRANS-3.3/2022 dated 7 December 2022.</p> <p>In general, the PT Inti Indosawit Subur - Tungkal Ulu including smallholders have calculated the Decent Living Needs using the calculation method as set out in the "RSPO Guidance for Implementing a Decent Living Wage", June 1, 2019. The company has conducted an account of the DLW for the 2022 period with data collection from each Estate and POM.</p> <p>Based on the verification of documents the results of the 2023 DLW calculation shows that total cost and kind benefits for average is IDR 1,698,301, average monthly take home salary per worker is IDR 2,483,986 and total value of prevailing wage is IDR 4,182,288.</p>	
<p><b>PROCEDURAL NOTE:</b></p> <p>The RSPO has published guidelines on the calculation of Decent Living Wage (DLW) in June 2019. Since Indonesia does not have DLW benchmark yet, the RSPO Secretariat will conduct a DLW benchmark study in accordance with the Global Living Wage Coalition (GLWC) and Indonesian laws and regulations.</p> <p>In the meantime, until DLW benchmark for Indonesia is endorsed by the RSPO, the unit of certification carries out interim measures that was published by RSPO (dated 11 November 2019), including:</p> <ol style="list-style-type: none"> <li>1. Payment of minimum wages in accordance with applicable regulations</li> <li>2. Assessment of wages paid (prevailing wages) and in-kind benefits.</li> </ol> <p>Once the DLW benchmark is available, this procedural note is no longer applicable.</p>			
6.2.7	<p>Permanent fulltime employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.</p> <p>- Minor compliance -</p>	<p>Based on Memorandum from Senior Manager of PT IIS- Tungkal Ulu Group No. 208/SM-KTU/MEMO/VII/2020 dated 23 July 2020 and SOP No. AA-HR-305.2-R concerning Recruitment and Selection of Employees, including harvesters in plantation units, states that newly recruited workers will experience a 3-month trial period carried out by their immediate superior. No later than 15 days before the 3 (three) month</p>	Complied

		<p>recruitment deadline, the section will provide a Probationary Period Evaluation form to the department concerned.</p> <p>The unit certification has identified those related to the main work in oil palm plantations based on the Circular Letter from GAPKI dated 8 February 2013 No. 073/GAPKI/II/2013 concerning the Circular on the Activity Flow of the Work Implementation Process in the Oil Palm Plantation Business Sector, stating that; only 2 (two) jobs that are the main activities in the Oil Palm Plantation industry, namely harvesting and processing products, the rest are supporting activities in accordance with <i>Permenakertrans No. 19/2012</i> which implementation can be left to other parties.</p> <p>The company has established a program for the appointment of PHL harvesters to Permanent workers (SKUH), as well as a program for the appointment/promotion of PHL harvest workers. This harvester employee appointment/promotion program has been submitted to the District Manpower and Transmigration Office of Tanjung Jabung Barat Regency.</p> <p>Based on interview with HRD during ASA2_1 it was revealed that a mechanism for recruiting daily worker, especially harvesters as permanent workers with a probationary period of 3 months is carried out. This is in accordance with applicable laws and regulations exist in Indonesia, namely Law No. 11 of 2021 the "UU Cipta Kerja/Job Creation Law" and Perpu No. 6 of 2023.</p> <p>Company has promoted the Appointment of PHL harvesters as follow:</p> <p><b>Tungkal Ulu Estate:</b></p> <p><u>In 2022</u></p> <ul style="list-style-type: none"> <li>- Memorandum No. 0113/HR-RO3/MEMO/05/2022 dated 18 May 2022, has been appointment PHL to SKU (Permanent) as many 18 harvesters.</li> </ul>	
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		<ul style="list-style-type: none"> <li>- Memorandum No. 045-046/HR-RO3/MEMO/SK/02/2023 dated 21 June 2023, has been appointment PHL to SKU as many 2 workers.</li> <li>- In semester II/2023 an evaluation will be carried out every three months for workers as a probationary period.</li> </ul>	
<p><b>Criteria 6.3:</b> The unit of certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			
<p>6.3.1</p>	<p><b>(C)</b> 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>- Critical (Major) compliance -</p>	<p>No changes on policy in this surveillance audit.</p> <p>Freedom of association policy is written in Bahasa Indonesia, as stated in "Kebijakan Perusahaan", dated 1<sup>st</sup> December 2014 "<i>Menghormati hak setiap karyawan untuk membentuk atau menjadi serikat pekerja sesuai dengan keinginannya dan untuk melakukan tawar menawar secara kolektif</i>". This policy has been informed to all employees and being placed into public area easily accessed, the last dissemination was on 10 December 2022.</p> <p>Tungkal Ulu Estate and POM have a Worker Union as a form of freedom of association for employees and already registered in Manpower Agency. All the policy is in Bahasa Indonesia and explained to all workers. The last meeting between union and the company was on 19 October 2022 regarding clausul on "Perjanjian Kerja Bersama (PKB)".</p> <p>Based on interview with Labour Union (obtained information that the company's policy above has been disseminated in Bahasa Indonesia to all of workers during morning briefing or through the signboard that installed in public area (office, housing complex, store, and morning briefing station).</p> <p><b>Scheme Smallholders:</b></p> <p>Scheme smallholder has had organization's policy: "Kebijakan Manajer Group ICS" dated 11 August 2020. Related the freedom of association, it</p>	<p>Complied</p>

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		<p>has mentioned on point 12: "<i>Menghormati setiap karyawan KUD atau petani untuk membentuk atau menjadi anggota serikat pekerja serta berkumpul dan berserikat atau berorganisasi</i>". This policy is made in Bahasa Indonesia, this is in order to facilitate understanding by all farmers.</p> <p>The policy has been disseminated to all smallholder members. Cooperative sample; KUD Karya Kita, KUD Karya Jaya, KUD Sari Bumi, KUD Sawit Mulia.</p> <p>There is no labour union that formed by smallholders (N/A).</p>	
6.3.2	<p>Minutes of meetings between the unit of certification with trade unions or worker representatives who are freely elected, are documented in the national languages and available upon request.</p> <p>- Minor compliance -</p>	<p>Record of meeting of SBSI/(Labor Union), such as:</p> <ol style="list-style-type: none"> <li>1) 19 October 2022, discussion regarding clausul on "Perjanjian Kerja Bersama (PKB)".</li> <li>2) 17 October 2022, discussion regarding members of union.</li> </ol>	Complied
6.3.3	<p>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> <p>- Minor compliance -</p>	<p>Based on interview with chairman of labour union obtained information that there is no interfere with the formation or operation of registered labour organizations/unions, or other freely elected representatives for all workers.</p> <p>Based on the labour union statutes, the right to become a member of a labour union is a permanent employee. Each member has voting rights (right to be elected and to vote).</p> <p><b>Scheme Smallholders:</b></p> <p>There is no labour union that formed by smallholders (N/A)</p>	Complied
<b>Criteria 6.4:</b> Children are not employed or exploited.			
6.4.1	<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>- Minor compliance -</p>	<p>There are no changes related to company policy, including the formal policy for child protection, including the prohibition of child labor and remediation in the "Company Policy", signed by the President Director on</p>	Complied

		<p>1 December 2019, in point 14 it is stated: All children are not allowed to work in any activity in the company. company”.</p> <p>Company policy was also published to place posters in strategic places on the plantations (Tungkal Ulu Plantation and Tungkal Ulu POM).</p> <p>All contracts, including contracts for the supply of FFB, contain special clauses regarding compliance with applicable legal requirements including regarding child labor/prohibition of employing children under 18 years, and this can be proven by a third party.</p> <p>Samples taken:</p> <p><u>Mill:</u></p> <ul style="list-style-type: none"> <li>- PT Trans Jaya Pertama Contract Number: 05/XII/TJP-IIS/2022, dated 01 December 2022, CPO and PK transporter.</li> <li>- PT Sumber Kencana Contract Number: 04/VI/SK-IIS/2022, dated 4 June 2022, as CPO, PK, CPKO transporter.</li> </ul> <p><u>Estate:</u></p> <ul style="list-style-type: none"> <li>- CV Trindo Jaya Pasifik Contract #017/E3KTU/01/22 dated 3 January 2022. Excavator rental.</li> <li>- PT Uniteda Arkato Contract #015/E3KTU/01/22 dated 3 January 2022. Road Grader Rental.</li> <li>- PT Uniteda Arkato Contract #016/E3KTU/01/22 dated 3 January 2022. Compactor rental.</li> <li>- PT Aneka Sumatrindo Contract #045/E3KTU/01/22 dated 3 January 2022. Tractor Backhoe Loader Rental.</li> <li>- PT Hazmat Techno Indonesia and PT Muhtomas, contract no. 07/SPJ/LEG-IIS/XII/2022 dated 1 December 2022</li> </ul> <p>Based on verification of employee data, updated in May 2023 there was shown that no indication of worker with age below 18 years old during recruitment or at the present time.</p>	
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		<p><b>Scheme Smallholder:</b></p> <p>Plasma Tungkal Ulu has established a policy regarding the prohibition of employing children (under 18 years). Samples taken from KUD Karya Kita, KUD Karya Jaya, KUD Sari Bumi, and KUD Sawit Mulia. The policy is explained in point 10; It is prohibited to employ children under the age of 18 in any plantation operational activities."</p> <p>Its policy has been disseminated to all head of cooperative chairman and smallholders, sample seen on February 2023 and attended by all member of each KUD.</p> <p>Based on a review of documents (employee lists) of KUD Karya Kita, KUD Karya Jaya, KUD Sari Bumi, and KUD Sawit Mulia, it was found that the minimum age was met (the youngest harvester was born in 1996 – based on identity verification).</p> <p>Example of a FFB transportation contract with a small farmer:</p> <ul style="list-style-type: none"> <li>- KUD Sawit Kita: "Transportation Work Agreement Letter No: 001/KUD-SK/I/2022" dated 17 January 2022. Agreement between: GODI (FFB transporter) and KUD Sawit Kita.</li> <li>- KUD Sari Bumi: "Transportation Work Agreement Letter No: 003/KUD-SB/I/2022" dated 20 January 2022. Agreement between: JAMUSRIDAL (FFB transporter) and KUD Sari Bumi.</li> </ul> <p>The Statements regarding child protection, including the prohibition of child labor and its remediation are contained in the contract.</p> <p>Based on document verification has shown that no indication of using child labour or worker under 18 years old.</p>	
6.4.2	<p><b>(C)</b> 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>- Critical (Major) compliance -</p>	<p>Unit of certification has established Company Policy dated 1 December 2019, that stated there is not allowed all children to work in every activities/process in company.</p> <p>Data seen:</p> <ul style="list-style-type: none"> <li>- Ananda Priaga Akbar (Harvester – Tungkal Ulu Estate Div. 1), birthdate</li> </ul>	Complied



		<p>20-02-1994 and joined on 1-10-2020 (26 y.o).</p> <ul style="list-style-type: none"> <li>- Edi Romadoni (Workshop – Tungkal Ulu Estate), birthdate 17-03-1997 and joined on 01-05-2021 (24 y.o).</li> <li>- Aldo Rifael Tampubolon (Process I operator) in Tungkal Ulu Mill, birthdate 27/04/2003 and joined on 18/04/2022 (21 y.o).</li> </ul> <p>Based on document verification on List of Employee May 2023 “Daftar Karyawan”, it was no found workers hired under 18 years.</p> <p><b>Scheme Smallholders:</b></p> <p>Plasma Tungkal Ulu have established policies related to the prohibition of employing children (under 18 years old). Samples taken for the KUD Karya Kita, KUD Karya Jaya, KUD Sari Bumi, and KUD Sawit Mulia Policy, explained in point 10; It is forbidden to employ children under the age of 18 in every plantation operational activity”.</p> <p>Its policy has been disseminated to all head of cooperative chairman and smallholders, sample seen on February 2023 and attended by all member of each KUD.</p> <p>Based on document review (list of employees) of KUD Karya Kita, KUD Karya Jaya, KUD Sari Bumi, and KUD Sawit Mulia, there were found that a minimum age met (the youngest of harvester born year 1997 – based on ID verification).</p>	
6.4.3	<p><b>(C)</b> Young person maybe employed only for non-hazardous work with protective restrictions in place for that work.</p> <ul style="list-style-type: none"> <li>- Critical (Major) compliance -</li> </ul>	<p>Based on List of Employee May 2023 “Daftar Karyawan Kebun Tungkal Ulu” and Memorandum #0113/HR-RO3/MEMO/05/2022, dated 18 May 2022, young workers are employed for non- hazardous work.</p> <p>Data seen:</p> <ul style="list-style-type: none"> <li>- Ananda Priaga Akbar (Harvester – Tungkal Ulu Estate Div. 1), birthdate 20-02-1994 and joined on 1-10-2020 (26 y.o).</li> <li>- Edi Romadoni (Workshop – Tungkal Ulu Estate), birthdate 17-03-1997</li> </ul>	Complied

		<p>and joined on 01-05-2021 (24 y.o).</p> <ul style="list-style-type: none"> <li>- Aldo Rifael Tampubolon (Process I operator) in Tungkal Ulu Mill, birthdate 27/04/2003 and joined on 18/04/2022 (21 y.o)</li> </ul>	
<p>6.4.4</p>	<p>The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.</p> <p>- Minor compliance -</p>	<p>There is no change in company policy regarding child labor.</p> <p>This policy has been communicated to all employees and placed on a notice board in a public and easily accessible place.</p> <p>This policy has been informed to all employees:</p> <ol style="list-style-type: none"> <li>a. In 2022, dissemination has performed on 18 April 2022 attended by 19 employees from Tungkal Ulu Estate.</li> <li>b. 11 January 2022, dissemination has conducted in Tungkal Ulu Estate and attended by 27 employees, on 2 February 2022 attended by 21 employees, on 7 March 2022 attended by 25 employees and on 4 April 2022 attended by 22 employees.</li> <li>c. 11 April 2022, dissemination has conducted in Tungkal Ulu Mill attended by 14 employees.</li> <li>d. In 2023 the socialization has performed:             <ul style="list-style-type: none"> <li>- On 21-22 February 2023 attended by 29 participants from Mill</li> <li>- On 25-27 January 2023 which attended by 34 participants form Tungkal Ulu Estate</li> </ul> </li> </ol> <p>Based on document verification has shown that no indication of using child labour or worker under 18 years old.</p> <p><b>Scheme Smallholder:</b></p> <p>Its policy has been disseminated to all head of cooperative chairman and smallholders, sample seen on February 2023 and attended by all member of each KUD.</p> <p>Based on document verification has shown that no indication of using child labour or worker under 18 years old.</p>	<p>Complied</p>

Criteria 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.		
6.5.1	<p><b>(C)</b> 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>- Critical (Major) compliance -</p>	<p>There are no changes in company policy, including the policy to protect reproductive rights as stated in the company policy signed by the President Director, dated December 1 2014 and in one part of the policy it is stated that: "Preventing sexual disclosure and various forms of violence against women and protect their reproductive rights " - (To prevent sexual and physical harassment from occurring to women and to protect their reproductive rights)". Company policy was also published to place posters in strategic places on the plantations (Tungkal Ulu Estate and Tungkal Ulu POM).</p> <p>There is a gender committee that actively meets and discusses the general agenda and other issues related to handling sexual harassment, socializing the prevention of sexual harassment.</p> <p>The gender committee's regular monthly meeting was held on 15 June 2022 which discussed protecting the rights of female workers including preventing sexual harassment and violence and all other forms of harassment and violence. The meeting was attended by 8 representatives of female workers from each job (an attendance list can be shown at the time of audit).</p> <p>This policy has been informed to all employees:</p> <ol style="list-style-type: none"> <li>a. In 2022, dissemination has performed on 18 April 2022 attended by 19 employees from Tungkal Ulu Estate.</li> <li>b. 11 January 2022, dissemination has conducted in Tungkal Ulu Estate and attended by 27 employees, on 2 February 2022 attended by 21 employees, on 7 March 2022 attended by 25 employees and on 4 April 2022 attended by 22 employees.</li> <li>c. 11 April 2022, dissemination has conducted in Tungkal Ulu POM attended by 14 employees.</li> <li>d. In 2023 the socialization has performed:               <ul style="list-style-type: none"> <li>- On 21-22 February 2023 attended by 29 participants from Mill</li> </ul> </li> </ol>
		Complied

		<p>- On 25-27 January 2023 which attended by 34 participants from Tungkal Ulu Estate</p> <p>Based interview with Gender Committee, in 2022 – 2023 there was no cases of sexual harassment and violence against women reported.</p> <p><b>Scheme Smallholder:</b></p> <p>Most farmers manage their land independently. Therefore, the policy does not apply directly to them. The organization has a policy to prevent sexual harassment and violence against women in the "ICS Group Manager Policy" which states "Prevent sexual harassment and various forms of violence against women and protect their reproductive rights" - (prevent sexual harassment and violence and protect reproductive rights for women) woman).</p> <p>Its policy has been disseminated to all head of cooperative chairman and smallholders, sample seen on February 2023 and attended by all member of each KUD, Cooperative sample; KUD Karya Kita, KUD Karya Jaya, KUD Sari Bumi, KUD Sawit Mulia.</p>	
6.5.2	<p><b>(C)</b> 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>- Critical (Major) compliance -</p>	<p>There is no change in the company policy.</p> <p>A policy to protect the reproductive rights as it is found in company policy that's signed by Managing Director, dated 01st December 2014 and on one part of the policies stated that: "<i>Mencegah pelecehan seksual dan berbagai bentuk kekerasan terhadap perempuan serta melindungi hak-hak reproduksinya</i>" - (To prevent any sexual or physical abuses happen to women as well as to protect their reproductive rights)". The company's policy is also published to use posters at any strategic places in the plantations (Tungkal Ulu Estate and Tungkal Ulu Mill).</p> <p>There is a gender committee actively meets and discussing general agenda and other issue related to handling sexual harassment, dissemination of sexual harassment prevention.</p>	Complied

		<p>The regular monthly gender committee meeting was held on 15 June 2023 which discussed the protection of the rights of women workers, including prevent sexual and all other forms of harassment and violence, the meeting was attended by 8 representatives of women workers from each job (a list of attendance can be shown at the time of the audit).</p> <p>This policy has been informed to all employees:</p> <ol style="list-style-type: none"> <li>a. In 2022, dissemination has performed on 18 April 2022 attended by 19 employees from Tungkal Ulu Estate.</li> <li>b. 11 January 2022, dissemination has conducted in Tungkal Ulu Estate and attended by 27 employees, on 2 February 2022 attended by 21 employees, on 7 March 2022 attended by 25 employees and on 4 April 2022 attended by 22 employees.</li> <li>c. 11 April 2022, dissemination has conducted in Tungkal Ulu POM attended by 14 employees.</li> <li>d. In 2023 the socialization has performed:             <ul style="list-style-type: none"> <li>- On 21-22 February 2023 attended by 29 participants from Mill</li> <li>- On 25-27 January 2023 which attended by 34 participants from Tungkal Ulu Estate</li> </ul> </li> </ol> <p><b>Scheme Smallholders:</b></p> <p>Most of the farmers are managed their land independently. Therefore, the policy does not directly applicable to them. Organization has policy to prevent sexual harassment and violence against women in "Kebijakan ICS Group Manager" which stated "<i>Mencegah pelecehan seksual dan berbagai bentuk kekerasan terhadap perempuan serta melindungi hak hak reproduksinya</i>" - (prevent sexual harassment and violence as well as protect reproductive rights for women).</p> <p>Its policy has been disseminated to all head of cooperative chairman and smallholders, sample seen on February 2023 and attended by all member</p>	
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		of each KUD. Cooperative sample; KUD Karya Kita, KUD Karya Jaya, KUD Sari Bumi, KUD Sawit Mulia.	
6.5.3	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified in accordance with applicable regulations in Indonesia.</p> <p>- Minor compliance -</p>	<p>The company has identified female workers as new mothers and conducted an assessment of their needs based on consultation with them. From the results of identifying the needs of new mothers in February 2023, from the results of interviews and filling out questionnaires with 25 new mothers who had children under 5 years of age, several needs were identified, including:</p> <ul style="list-style-type: none"> <li>- There is a need for space for breastfeeding mothers, and this has been followed up by budgeting costs in the 2022 and 2023 budgets.</li> <li>- The need for time/permission for workers who are still breastfeeding has been followed up through the Estate Manager's policy by granting permission for 30 minutes to breastfeed their children (Memorandum from Seniro Manager No. 01/ES-KTU/MEMO/I/2021 regarding Rights of breastfeeding workers; Given time for 30 minutes from 10.00-10.30.</li> <li>- The need for health services for mothers and children has been followed up with Posyandu services once a month (which has been and is still running today)</li> <li>- Providing additional food to children under 5 years has been followed up during the implementation of Posyandu services by providing additional food in the form of baby porridge, eggs and bread and formula milk.</li> </ul> <p>During interviews with female workers in Manuring activities and the head of the gender committee, it was explained that the company provides breastfeeding time in the workers' complex or childcare center.</p>	Complied
6.5.4	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, as long as the complaint is supported with adequate information, is documented, implemented and communicated to all levels of the workforce.</p>	<p>There were no changes related to mechanism to handle complaint and grievances, namely:</p>	Complied

	<p>- Minor compliance -</p>	<ul style="list-style-type: none"> <li>• "SOP Penanganan Keluhan dari Eksternal No. AA-GL-5005-R0 01" explains mechanism to resolve external complaint.</li> <li>• "SOP Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan No. AA-HR-308 0.5R0" related to internal grievance mechanism for employee.</li> <li>• SOP Penanganan Keluhan Masyarakat No: AA-GL-510.1-R0, dated 1 January 2013.</li> </ul> <p>Mechanism for complaints management where it needs to protect its confidentiality for complaint submitter was found in the company policy's draft as in one of the points of this policy stated that:</p> <p><i>"To provide appropriate information for those who inquire about it and to protect its confidentiality for whistle blower cases in accordance with law regarding environmental and social issues, food safety, health and work safety, so that it enables them to more participate in the decision making processes for improving company's performance".</i></p> <p>Based on interviews with several village heads, government agencies and other stakeholders, that until the surveillance audit was carried out, there were no external complaints from stakeholders including related to sexual harassment.</p> <p><b>Scheme smallholder</b></p> <p>Plasma farmers have a consultation and communication mechanism in "Communication, consultation and complaint mechanism for Tungkal Ulu Group Plasma Plantations", established in April 2021.</p> <p>Based on the logbook in the form of "Reception of Complaints and Responses" for the period 2022 and 2023, no complaints were reported.</p>	
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**Criteria 6.6:** No forms of forced or trafficked labour are used.

<p>6.6.1</p>	<p><b>(C)</b> All work is voluntary and the following are prohibited:</p> <ul style="list-style-type: none"> <li>• Retention of identity documents or passports;</li> <li>• Payment of recruitment fees;</li> <li>• Contract substitution without worker’s consent</li> <li>• Involuntary overtime;</li> <li>• Lack of freedom of workers to resign</li> <li>• 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</li> <li>• Debt bondage</li> <li>• Withholding of wages</li> </ul> <p>- Critical (Major) compliance -</p>	<p>During audit ASA2_1 and according to work contract, confirmed that all work is voluntary and there is no:</p> <ul style="list-style-type: none"> <li>- Retention of identity documents or passports;</li> <li>- Payment of recruitment fees;</li> <li>- Contract substitution without worker’s consent</li> <li>- Involuntary overtime;</li> <li>- Lack of freedom of workers to resign</li> <li>- 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</li> <li>- Debt bondage</li> <li>- Withholding of wages</li> </ul> <p>No form of forced labor occurs in PT IIS – Tungkal Ulu Group. Company has a policy to comply with manpoer regulation UU No. 13 Tahun 2003 and UU no. 11 Tahun 2021 relate to UU Cipta Kerja.</p> <p>Company also has a policy to prevent and prohibit the forced labor as per “Kebijakan Perusahaan” signed by Managing Director on 1st December 2019. Stated in Company Policy point 17 “<i>Tidak memberikan pekerjaan dibawah ancaman, sanksi atau hukuman dimana pekerja tidak memiliki kebebasan untuk menyepakati pelaksanaan pekerjaan</i>”.</p>	<p>Complied</p>
<p>6.6.2</p>	<p><b>(C)</b> 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>- Critical (Major) compliance -</p>	<p>There is no migrant worker in PT IIS – Tungkal Ulu and there is no PKWT workers.</p> <p>There are 2 types of employees at PT IIS – Tungkal Ulu Group, namely Permanent Workers (SKUH and SKUB) as much as 226 workers and daily workers (PHL: Pekerja Harian Lepas - Casual Daily Workers) as much as 305 workers. PHL workers from 305 workers are as follows, namely upkeeping, pruning, manuring, spraying, IPM workers, and EFB application workers.</p>	<p>Complied</p>



		<p>The unit certification has identified those related to the main work in oil palm plantations based on the Circular Letter from GAPKI dated 8 February 2013 No. 073/GAPKI/II/2013 concerning the Circular on the Activity Flow of the Work Implementation Process in the Oil Palm Plantation Business Sector, stating that; only 2 (two) jobs that are the main activities in the Oil Palm Plantation industry, namely harvesting and processing products, the rest are supporting activities in accordance with <i>Permenakertrans No. 19/2012</i> which implementation can be left to other parties.</p> <p>PT IIS – Tungkal Ulu Group has established mechanism/procedure related to recruitment; SOP no. AA-HR-305-2-00 dated 1 February 2009 – Recruitment and Selection and the management of PT IIS – Tungkal Ulu Group (Group Manager).</p> <p>Memorandum from Medan Head Office Management September 1, 2020 No. 034/MB/MEMO/IX/20 concerning Guidelines for Recruitment and Appointment of Employees of PT IIS - Tungkal Ulu Group are still consistently implemented and used as guidelines for disruption of PKWT /PHL workers, including explaining the determination of the maximum period of PKWT/PHL for 3 (three) years taking into account the feasibility evaluation.</p> <p>This memorandum is effective from 1 September 2020 and this memorandum is also based on reference to Law No. 11 of 2021 concerning <i>UU Cipta Kerja</i>.</p>	
<p><b>Criteria 6.7:</b> The unit of certification ensures that the working environment under its control is safe and without undue risk to health.</p>			
<p>6.7.1</p>	<p><b>(C)</b> The responsible person(s) for H&amp;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>- Critical (Major) compliance -</p>	<p>PT Inti Indosawit Subur – Tungkal Ulu POM and Estate has appointed the responsible person for H&amp;S is identified as per P2K3 (Safety Committee Meeting). P2K3 organisation has been updated in 2023 and has an approval from Manpower and Transmigration Office.</p> <p><u>Tungkal Ulu POM:</u></p>	<p>Complied</p>

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		<p>P2K3 Tungkal Ulu POM has been formed and has an endorsement/approval from Manpower Office Jambi Province according to "Keputusan Kepala UPTD Balai Pengawasan Ketenagakerjaan Wilayah I Nomor 26 Tahun 2022 tentang Pengesahan Panitia Pembina Keselamatan dan Kesehatan Kerja (P2K3) pada Perusahaan PT Inti Indosawit Subur PMKS Tungkal Ulu" dated 14 July 2022. Safety committee meeting/P2K3 comprise of:</p> <p>Chairman: Bellie Tan Secretary: Mitra Prasetyo (OHS Expert) Supervision location: Heri Juliansyah, Rizaldi, Bayu Agung Prakoso, Putra H. Matondang, Gerardo Pinem Member: 20 people from each station, office and laboratory including security.</p> <p>Safety Officer or "Ahli K3 Umum" OSH expert was assigned as P2K3 secretary. Safety Officer on behalf Ahmad Alwi has a license from Ministry of Manpower, licence number No. Reg. 88645/PK3/AJ/12/2020/P0 dated 21 October 2020, valid until 21 October 2023.</p> <p><u>Tungkal Ulu Estate:</u></p> <p>P2K3 Tungkal Ulu Estate has been formed and has an endorsement/approval from Manpower Office Jambi Province according to "Keputusan Kepala UPTD Balai Pengawasan Ketenagakerjaan Wilayah I Nomor 24 Tahun 2022 tentang Pengesahan Panitia Pembina Keselamatan dan Kesehatan Kerja (P2K3) pada Perusahaan PT Inti Indosawit Subur Kebun Tungkal Ulu" dated 13 July 2022. Safety committee meeting/P2K3 comprise of:</p> <p>Chairman: Sufryadi Askep: Frans Doli S.S Secretary: Iqbal Sarwan Arif (OHS Expert)</p>	
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		<p>Member: 50 personel covering all area</p> <p>Safety Officer or "Ahli K3 Umum" OSH expert was assigned as P2K3 secretary. Safety Officer on behalf Iqbal Sarwan Arif has a license from Ministry of Manpower with registration number 107380/PK3/AJ/12/2021/P0 dated 29/12/2021, valid until 29/12/2024.</p> <p>Safety meeting conducted in monthly basis. Based on the Safety Committee Report, the last one was in May 2023. Record seen: Minutes of meeting agenda: review and analysis accident record/report, review disease report of clinic, review near miss report, any other issue related to OHS.</p> <p>Report of P2K3 meeting and OHS performance has reported to Manpower Agency in Batang Hari Regency each quarter (three-monthly), sample seen report P2K3 Tungkal Ulu POM and Estate period July – Sett 2022, Oct - Dec 2022 and Jan – Mar 2023. Evidence of report receipt can be demonstrated during audit as per "Daftar Distribusi Eksternal".</p> <p><b><u>Scheme Smallholder:</u></b></p> <p>Scheme smallholder has appointment the "Asisten Plasma" as person in charge for cooperative's health and safety aspects. Each KUD also assigned person in charge for OHS monitoring and supervision as per:</p> <ul style="list-style-type: none"> <li>- Surat Keputusan Pengurus Sawit Mulia, Desa Intan Jaya Kecamatan Mauara Papalik Nomor: 04/KUD-SM/SKPPK3/SM/03/2023 dated 21 March 2023, PIC OHS on behalf Ikhsal Hadi</li> <li>- Surat Keputusan Pengurus Karya Jaya, Desa Bukit Harapan, Kecamatan Merlung Nomor: 04/KUD-KJ/SKPPK3/KJ/02/2023 dated 22 Februari 2023, PIC OHS on behalf Mujiono.</li> </ul> <p>Safety Meeting in KUD has been conducted regularly. Meeting agenda consisting of training on OHS and PPE usage (PPE for harvesting, spraying and fertilizing, FFB transporting). Record of regular meeting management plasma can be demonstrated during audit in "Notulen Rapat", latest</p>	
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		<p>meeting conducted on 2 February 2023 and 15 February 2023 in KUD Karya Jaya, 15 March 2023 in KUD Sawit Mulia.</p>	
<p>6.7.2</p>	<p>Accident and emergency procedures in Indonesian language are in place and clearly understood by all workers. Assigned operatives trained in first aid are present in both field and other operations. First aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>PT Inti Indosawit Subur – Tungkal Ulu has defined the procedure for emergency response under Standar Operatonal Procedure – Environmental Field Procedure, such as:</p> <ul style="list-style-type: none"> <li>- Nomor AA-KL-11-EFP tentang Penanganan Tumpahan di Laboratorium</li> <li>- Nomor AA-KL-14-EFP tentang Pengendalian Kebakaran Lahan</li> <li>- Nomor AA-KL-16-EFP tentang Pengendalian Tumpahan B3 dan Limbah B3</li> <li>- Nomor AA-KL-17-EFP tentang Pengendalian Ledakan Boiler, Tabung Gas dan Lainnya</li> <li>- Nomor AA-KL-18-EFP tentang Pengendalian Gempa Bumi, Banjir dan Tanah Longsor</li> <li>- Nomor AA-KL-19-EFP tentang Tanggap Darurat Kabut Asap</li> </ul> <p>PT Inti Indosawit Subur – Tungkal Ulu has also prepared the procedure on work accident under "Standard Operasional Prosedur – Investigasi Kecelakaan Kerja nomor AA-SMK3-18001.02-R0", revision 0 dated 1<sup>st</sup> April 2018. In the accident investigation form include: the accident data, details of injuries/sections exposure, photographs/sketches, evidence of investigation (witnesses, positions, equipment, documents), sequence of events (pre-contact, contact, post-contact), type of incident, cause of accident (unsafe, unsafe) accidents (personal and work factors), corrective and preventive actions, investigative team. During audit verification, found that the accident form was complete and adequate.</p> <p>Procedure for first aid and emergency situation available under "Kesiagaan dan Tanggap Darurat" document, number AA-EMS-447-PR, dated December 2010. The emergency situation identified such as land and forest fire, fire at housing and mill, hazardous waste spillage, boiler explosion, gas tank explosion, earthquake, flood, landslide, etc. A team for emergency response has been established, headed by Mill Manager</p>	<p>Complied</p>

		<p>and Estate Manager Records of accidents maintained properly by safety officers and reported regularly to local authorities.</p> <p>A team for emergency response has been established, headed by Mill Manager and Estate Manager, called OHS Committee (P2K3). Records of accidents maintained properly by safety officers and reported regularly to local authorities.</p> <p>PT Inti Indosawit Subur – Tungkal Ulu has appointed a worker who have attended the First Aid training. Data verified: License for First Aider No : Ser/UPTD I/Nakertrans/3.1.2/X/2021 dated 16 October 2021, namely Basir; First Aider licence on behalf Basir register number No : Ser/UPTD I/Nakertrans/3.1.2/X/2021, dated 16 October 2021 and valid until 16 October 2024.</p> <p>SOP of accident and emergency procedure are available in Indonesia language and clearly understood by workers. Evacuation route and assembly point are available in Muara Tungkal Ulu POM and Tungkal Ulu Estate Office. During interview with workers, they understand the evacuation route and assembly point and how to response during emergency situation.</p> <p>First aid equipment has been provided by Tungkal Ulu POM, Estate and Scheme Smallholder. List of first aid kit (include portable first aid) as in "Checklist inspeksi P3K". First aid kit located at Tungkal Ulu Estate at location Workshop/traksi, Warehouse, TPS LB3, Afdeling office and portable first aid kit brought by Field Foreman. While in Tungkal Ulu POM first aid kit located in Fuel storage/Warehouse, Workshop, Office, Warehouse central, Laboratory, engine room, chemical warehouse, WTP station, Hazardous waste storage.</p> <p><b>Scheme Smallholder:</b>          KUD Karya Jaya, Sawit Mulia, Sari Bumi and Karya Kita has "Kebijakan &amp; Mekanisme Pertolongan Pertama Pada Kecelakaan" dated 10 May 2023.</p>	
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		<p>In the mechanism explain how to mitigate and handling accident in the field and how to conduct first aid for accident.</p> <p>Emergency response procedure and mechanism also has been established as per "Rencana Tanggap Darurat", explain the emergency response handling for land fire and oil/chemical spill.</p> <p>First aid kit was provide and available for scheme smallholder, field foreman are equipped with first aid kit during field working (harvesting and upkeeping).</p>	
<p>6.7.3</p>	<p><b>(C)</b> 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>- Critical (Major) compliance -</p>	<p>PT Inti Indosawit Subur – Tungkal Ulu has demonstrated the record of realization the OHS program 2023 including use appropriate personal protective equipment (PPE) which is provided free of charge to all workers in the workplace, to cover all potentially hazardous operations, such as pesticides application, machine operations, land preparation, and harvesting, such as:</p> <ul style="list-style-type: none"> <li>• Tungkal Ulu Estate - PPE provision for all workers at Tungkal Ulu Estate are demonstrated as per "Bukti Serah Terima Alat Pelindung Diri". Sample seen:             <ul style="list-style-type: none"> <li>– Dated 3 January 2023 – PPE Apron, masker, handgloves for fertilizer workers (15 workers).</li> <li>– Dated 3 March 2023 – PPE Apron, Ap boots for spraying workers (13 workers).</li> <li>– Dated January 2023 - PPE safety shoes for Mill workers (88 workers – security, office, workshop, operator)</li> <li>– Dated March 2023 - PPE safety helmet for mill operator (12 workers/operator)</li> <li>– Dated March 2023 - PPE safety helmet for mill operator (14 workers/operator)</li> </ul> </li> </ul>	<p>Complied</p>

		<ul style="list-style-type: none"> <li>• Scheme Smallholders - PPE provision for all workers at Tungkal Ulu Estate are demonstrated as per "Bukti Serah Terima Alat Pelindung Diri". Sample seen:             <ul style="list-style-type: none"> <li>– PPE provision for harvester in each KUD such as helm, safety boots and <i>sarung egrek</i>.</li> </ul> </li> </ul> <p>Based on field visit during onsite audit in June 2023, there was found the harvester, mill operator, fertilizer workers and sprayer workers has used PPE as required in HIRADC.</p> <p>Spraying workers risk impact probability was irritated and eyes disease and chemical expose, control by using appropriate PPE (eye wear/safety glasses, mask, and hand gloves) and regular training for sprayer workers.</p> <p>Discipline of PPE usage monitoring regularly conducted by Mill and Estate management to ensure all workers use the appropriate PPE during working. Monitoring record present in "Daftar Pemeriksaan APD Karyawan". Sample seen for PPE monitoring of sprayer and fertilizer workers period January – May 2023.</p> <p>Sanitation facilities for pesticides operators/spraying workers are available in the warehouse area, spraying workers can change out of PPE, wash and put on their personal clothing; each worker are provided the personal locker box to save the clothes and PPE.</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>- Minor compliance -</p>	<p>PT Inti Indosawit Subur – Tungkal Ulu has provided all normative rights for employee, such as salary as lined out in minimum wage for province level, leave entitlement, employees registered with accident insurance for workers (BPJS) including for daily workers, 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 – Tungkal Ulu has provided regular medical check-up for workers in high risk such as sprayer team, fertilizer applicator, workshop worker and mill operators.</p>	Complied

		<p>PT Inti Indosawit Subur – Tungkal Ulu has also been provided clinic for all workers. Referral are made to nearest hospital should the case is severe/critical.</p> <p>Medical care insurance cover with BPJS Kesehatan which is paid proportion by company and workers according to the government regulation.</p> <p>Accident insurance and retire insurance cover with BPJS Ketenagakerjaan which is paid proportion by company and workers according to the government regulation.</p> <p>Sample seen for BPJS Kesehatan and BPJS Ketenagakerjaan Payment period May 2023:</p> <ul style="list-style-type: none"> <li>- Record for payment of accident and works insurance (BPJS Ketenagakerjaan) period May 2023, amount IDR IDR 243,707,xxx status PAID for 846 workers of Tungkal Ulu Estate.</li> <li>- Record for payment of medical insurance (BPJS Kesehatan) period May 2023, amount IDR IDR 104,070,xxx status PAID for 1,417 people (workers including dependent) Tungkal Ulu Estate.</li> <li>- Record for payment of accident and works insurance (BPJS Ketenagakerjaan) period May 2023, amount IDR IDR 35,820,xxx status PAID for 119 workers of Tungkal Ulu POM.</li> <li>- Record for payment of medical insurance (BPJS Kesehatan) period May 2023, amount IDR IDR 17,584,xxx status PAID for mill workers including dependent Tungkal Ulu POM.</li> </ul> <p><b>Scheme smallholders:</b></p> <p>No workers being employ permanently by the smallholders. Provision of insurance in case of accident, through donation from smallholders and “Kelompok Tani”.</p>	
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<p>6.7.5</p>	<p>Occupational injuries are recorded using Lost Time Accident (LTA) metrics.          - Minor compliance -</p>	<p>PT Inti Indosawit Subur – Tungkal Ulu has kept the record of occupational injuries using LTA metrics under “Data Laporan Kecelakaan Kerja” year 2022.          Data seen:          – The occupational injuries Jan – Dec 2022 reported 9 cases first aid and 1 case medical aid. Lost time injuries are 2 man-days.          – The occupational injuries Jan – May 2022 reported 3 cases medical aid. Lost time injuries are 12 man-days.          – All the accident has carried out the investigation. The followed up on recommendation on result of investigation available as evidence.</p> <p><b>Scheme Smallholders:</b>          The procedure for work incident has demonstrated as in document “Mekanisme Pertolongan Pertama Pada Kecelakaan”, document verified in sampled KUD.          KUD/cooperatives record the work incident in “Rekaman kejadian Kecelakaan Kerja Tahun 2022”. Record of incident were also available in Puskesmas (Village clinic).          According to record of accident there is no accident reported since January – December 2022 and January – May 2023 in sampled KUD.</p>	<p>Complied</p>
<p><b>Principle 7: Protect the environment, conserve biodiversity and ensure sustainable management of natural resources.</b></p>			
<p><b>Criteria 7.1:</b> Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.</p>			
<p>7.1.1</p>	<p><b>(C)</b> IPM plans are implemented and monitored to ensure effective pest control.          - Critical (Major) compliance -</p>	<p><b>Estate</b>          According to the Agricultural Policy Manual SOP AA-APM-OP-1100.10. R6 <i>Pengendalian Hama dan Penyakit</i> (Pests &amp; Disease Control), certificate holder has plan to implement integrated pest management.</p>	<p>Complied</p>

		<p>According to the interview with pest control officer in Tungkal Ulu Estate obtain information that management has a schedule to regularly monitored pest attack (census) as follows:</p> <ul style="list-style-type: none"> <li>• Census of caterpillar/bag worm by monthly basis.</li> <li>• Census of <i>Ganoderma</i> annually.</li> <li>• Census rat infestation by recap the record of sortation in loading ramp.</li> <li>• Census of Barn Owl Box occupation in three monthly bases.</li> </ul> <p>The last census in Tungkal Ulu Estate has been conducted in second week of May 2023. Result of census shows that pest attack still under control (below the economic threshold) which is limit 5%.</p> <p>During the field visit in own estate (Tungkal Ulu Estate block B19a Afdeling 2) visually there was no issues related to the outbreak or infestation. However, there were a usage of natural predator (<i>Tyto alba</i>) to reduce a rat infestation.</p> <p><b>Scheme Smallholder:</b></p> <p>According to document verification during ASA2.1, 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. There is no report of outbreak in their plot (4 KUD) so far.</p>	
7.1.2	<p>Invasive species are not to be used according to applicable regulation in managed areas, unless plans to prevent and monitor their spread are implemented.</p> <p>- Minor compliance -</p>	<p>The company only uses natural predators namely <i>Tyto alba</i> and <i>Sycanus dichotomus</i> in pest control efforts. Both predators are not recorded in invasive species according to the information listed on the website <a href="http://www.cabi.org">www.cabi.org</a> on in global invasive species database <a href="http://www.iucngisd.org/gisd/search.php">http://www.iucngisd.org/gisd/search.php</a>.</p>	Complied

7.1.3	<p>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.</p> <p>- Minor compliance -</p>	<p>Based on document verification, interview and field observation during ASA2.1 obtained information that there is no record use of fire for pest control.</p>	Complied										
<b>Criteria 7.2:</b> Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.													
7.2.1	<p><b>(C)</b> Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p> <p>- Critical (Major) compliance -</p>	<p>Based on the document verification and interview with management, obtain information that there is only pesticide usage for chemical weeding and pest control (if needed). Recommendation of pesticide used are refer to SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i> (weed control) where explain the weeds type, weeding control methods and eradication, pesticide characteristic, and procedures of application (spraying volume, calibration, chemical weeding interval, target and sprayer maintenance).</p> <p>During the audit, found some pesticide list that usually used with active ingredients such as <i>isopropyl amine glyphosate, fluoroksifir, methyl metsulfuron, triklofir, diuron, diuron, lamda sihalotrin and 2,4-D dimetil amina, bacillus thuringiensis berliner, ammonium glufosinat, acephate, copper oxide and mancozeb</i>. Certificate holder no longer using paraquat since 15 November 2019, according to the circular letter of Deputy Managing Director No. 008/DMD/MEMO/OCT/19 dated 22 October 2019.</p> <p>According to the national regulation, all pesticide used by the management unit has registered in agricultural ministry of Indonesia.</p> <p>PT Inti Indosawit Subur – Tungkal Ulu already has a list of pesticides use that refers to the "Penggunaan Pestisida dan LD50 Tahun 2023" as follows:</p> <table border="1" data-bbox="1093 1209 1928 1292"> <thead> <tr> <th data-bbox="1093 1209 1256 1292">Brand</th> <th data-bbox="1256 1209 1420 1292">Active Ingredient</th> <th data-bbox="1420 1209 1529 1292">LD50</th> <th data-bbox="1529 1209 1624 1292">WHO Class</th> <th data-bbox="1624 1209 1928 1292">Target use</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Brand	Active Ingredient	LD50	WHO Class	Target use						Complied
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7.2.2	<p><b>(C)</b> Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per Ha and number of applications) are provided.</p> <p>- Critical (Major) compliance -</p>	<p>Certificate holder has showed the record of LD50 calculation in each unit based on amount of pesticide used. For example, Kebun Tungkal Ulu has calculated the LD50 based on amount of active ingredients applied per Ha and number of applications for Y2022 and 2023.</p> <p>Period 2023</p> <table border="1"> <thead> <tr> <th>Brand</th> <th>Active Ingredient</th> <th>LD50</th> <th>Total Used</th> <th>Total Active Ingredient</th> </tr> </thead> <tbody> <tr> <td>Polydor 25 EC</td> <td>Lambda sihalotrin: 25 gr/ltr</td> <td>2625</td> <td>72.9</td> <td>0.08</td> </tr> <tr> <td>Glufo</td> <td>Amonium glufosinat 150 g/l</td> <td>5000</td> <td>1,121</td> <td>7.48</td> </tr> <tr> <td>Metaprima 20WG</td> <td>Methyl Metsulfuron</td> <td>5000</td> <td>420,607</td> <td>84,121</td> </tr> <tr> <td>Gulmaron 80 WP</td> <td>3-(3.4-diklorofenil)-1.1 dimetilurea</td> <td>2900</td> <td>379</td> <td>303.20</td> </tr> </tbody> </table>	Brand	Active Ingredient	LD50	Total Used	Total Active Ingredient	Polydor 25 EC	Lambda sihalotrin: 25 gr/ltr	2625	72.9	0.08	Glufo	Amonium glufosinat 150 g/l	5000	1,121	7.48	Metaprima 20WG	Methyl Metsulfuron	5000	420,607	84,121	Gulmaron 80 WP	3-(3.4-diklorofenil)-1.1 dimetilurea	2900	379	303.20	Complied
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7.2.3	<p><b>(C)</b> Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p> <p>- Critical (Major) compliance -</p>	<p>Until this ASA2.1 audit obtain information that there is no pesticide use for control pest attack. All of pesticide only using for weeding (herbicide). Based on interview with IPM supervisor and smallholder representatives known that no outbreak that causes pesticide usage. And then for example for Y2023 the organization has minimised the use of the pesticides of Polydor 25EC compared to last year. IPM plans has already set by the company to minimise the use of pesticides.</p>	Complied																																																												

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7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in Indonesia best practice guidelines.</p> <p>- Minor compliance -</p>	<p>During this ASA2.1 audit, 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 with Asian Agri’s Research and Development guidelines.</p>	Complied
7.2.5	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat, are not to be used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks. The due diligence refers to:</p> <p>- Minor compliance -</p> <p>7.2.5a Judgment of the threat and verify why this is a major threat.</p> <p>7.2.5b Why there is no other alternative which can be used.</p> <p>7.2.5c Which process was applied to verify why there is no other less hazardous alternative.</p>	<p>Based on verification of goods in and goods out data in pesticide store during ASA2.1, 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.</p> <p>During this ASA2.1 audit, according to IPM procedures, certificate holder always using biological approach in order to be monitoring pest attack. For example, estate still using <i>Tyto alba</i> to monitor rat infestation than using rodenticide.</p> <p>To maintain ground condition especially weeding control, certificate holder has had a procedures SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i> (Weed Control). This procedure has set the specific pesticide in with minimum risk in accordance with the target. During this ASA2.1 audit there is no revision of the SOP.</p> <p>Company no longer using <i>paraquat diklorida</i> since November 2019. During field visit to scheme smallholder plots consistencies were found; there is no smallholder member sampled are using paraquat by themselves for weeds control in their plots.</p> <p>Certificate holder through Asian Agri’s Research and Development Department has examined some pesticide in specific target. The result of examination and pesticide recommendation written in the SOP AA-APM-</p>	Complied

		<p>OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i> (Weed Control). During this ASA2.1 audit there is no revision of the SOP.</p> <p>There is no use of pesticide that are categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, or paraquat in whole operation of unit of certification.</p>	
	<p>7.2.5d Process to limit the negative impacts of the application.</p>	<p>SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i> (Weed Control) has set some procedures to reduce negative impact of the application as follows:</p> <ul style="list-style-type: none"> <li>• Pesticide/herbicide selection to ensuring the application is effective.</li> <li>• Set up the appropriate nozzle in chemical weeding activity based on weed type, topography and availability of water.</li> <li>• Regularly spraying calibration to ensuring the application is effective and efficient.</li> <li>• Calculate pesticide/herbicide usage based on target (hectarage and weed type).</li> <li>• Spraying technic.</li> </ul> <p>There is no use of pesticide that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, or paraquat in whole operation of unit of certification.</p>	
	<p>7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</p>	<p>Certificate holder did not use pesticide to eradicated pest without the outbreak. If any census result shows the pest attack almost reach the economical threshold, they usually conducted campaign test using pesticide if needed.</p> <p>Chemical weeding activity has regularly set by management. For example, normally circle, path and collecting point weeding conducted 4 times a year in immature and mature area. It rotation can be reduced in line with the palm ages.</p>	

		<p>There is no use of pesticide that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, or paraquat in whole operation of unit of certification.</p>	
<p>7.2.6</p>	<p><b>(C)</b> Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they conduct.</p> <p>- Critical (Major) compliance -</p>	<p>Certificate holder has assigned chemical weeding team (<i>Tim Unit Semprot/TUS</i>) in each estate/unit to handling chemical weeding activity. The team member originated from own workers (for own estate) and local communities (for smallholder). They regularly attended training on pesticide handling that conducted by the pesticide supplier in collaboration with local pesticide committee.</p> <p>Based on document review obtained information that the company has conducted pesticide handling training on 6 April 2023. 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 training was attended by 21 pesticides applicators.</p> <p>Application of pesticides was following SOP of Pesticides Management – “Pestisida dan Pengelolaannya” (AA-APM-OP-1100.11-R1) Chapter III point 3.2 which stated that pesticide operator must be fit, not in pregnancy or breast feeding, must have meal before work, and uses appropriate PPE.</p> <p>Spraying team using sign board indicating spraying/herbicide application is in progress for a block. Spraying supervisor was pre- mixing the herbicide in the chemical warehouse, transport the mixed chemical via truck, using cone and spill tray on the field to minimize spillage. The type and dosage of herbicide are carefully measured and prepared for targeted weed control; circle and path spray or selective weeding (wooden, bracken, or VOP). Nozzle calibration conducted regularly and recorded – evident.</p> <p>Sprayers and spraying supervisor are trained with best management practice for weed control, spraying techniques, using PPE and received</p>	<p>Complied</p>



		<p>regular medical check-up. Clean water and soap on the field are provided for sprayer. Supervisor was equipped with first aid kit.</p> <p>Appropriate PPE has been provided by company and used by spraying workers such as: Apron, leather and rubber hand gloves, respiratory masker, safety goggles, head cover and rubber boot.</p> <p><b>Scheme Smallholder</b></p> <p>The training for pesticides applicator especially for applicator who assigned to work in scheme smallholders has conducted in Y2023 as per training metrics, for example verified training document on 6 April 2023 that was attended by 15 applicators. The applicators are from PT IIS Team, namely Tim TUS (Tim Unit Semprot).</p>	
<p>7.2.7</p>	<p><b>(C)</b> Storage of all pesticides in accordance with recognized best practices.</p> <p>- Critical (Major) compliance -</p>	<p>Pesticides are always applied in accordance with the product label and storage instruction. Agrochemicals storage was locked 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. PPE for handling of chemicals were provided including boots, apron, safety glass, respiratory mask and hand gloves. The possible spill was managed. Secondary containment was provided around the chemical storage area. Spill kit was also provided in the area.</p> <p>SOP for pesticide storage has been provided in SOP "Pengangkutan dan Penyimpanan Bahan Kimia AA-KL-02-EFP" dated 1 February 2008. Pesticides are stored in the determined area separated from fertilizer and other chemicals.</p> <p>Storage of pesticides found to be in accordance with hazard identification and risk assessment and national guideline for limited pesticide use. Empty chemical containers had been used for mixing chemicals for spraying pesticides in the field. The management of waste material from empty pesticide container disposed through hazardous waste store as per</p>	<p>Complied</p>

		<p>procedure "Penanganan Limbah Industri B-3 AA-KL-06-EFP" dated 1 November 2008.</p> <p>Based on a field visit to the Pesticides Storage during ASA2.1, there was found that:</p> <ul style="list-style-type: none"> <li>• Permanent Buildings.</li> <li>• Good ventilation.</li> <li>• The permanent floor is cemented, the floor of the mixing of pesticides using ceramics, and equipped with a "spillage trap".</li> <li>• Eye wash shower, first aid box, PPE and Fire extinguisher are provided.</li> <li>• PPE room.</li> <li>• Operation control: MSDS are available for all types of existing pesticides and pesticide management and safety instructions are available.</li> <li>• A package management/ used pesticide package is available.</li> <li>• Water wash of pesticides containers collected in "spillage trap".</li> <li>• The flow of wastewater is channeled and stored so that it is not discharged into the environment. The water used is used for its dilution.</li> </ul> <p><b>Scheme Smallholders:</b></p> <p>All agrochemical usage and waste handling were performed by TUS team from PT Inti Indosawit Subur. So, there are no pesticides handling and storage conducted by farmers and <i>Koperasi</i>.</p>	
7.2.8	<p>All pesticide containers that are disposed of and/or used for other purposes are managed according to applicable regulations and/or instructions on the packaging.</p> <p>- Minor compliance -</p>	<p>SOP for proper disposal of pesticide waste material was described in "Penanganan Limbah Industri B-3 AA-KL-06-EFP" dated 1 November 2008. Pesticide waste was reusing as mixing water for the next spraying activity. All empty pesticides containers were triple rinsed and stored in the temporary storage of hazardous wastes.</p>	Complied

		<p>The management of waste material from empty pesticide container disposed through hazardous waste store according to the procedure. The company has licensed temporary hazardous waste storage where all empty pesticide containers from agrochemical storage collected. During field visit to temporary hazardous waste storage it was found that all pesticide container managed according to procedure. There is no pesticide container use for another purposes; all pesticide container collected and deliver to licensed collector of hazardous waste.</p> <p>Personnel interviewed during field observation during ASA2.1, can clearly explain the mechanism of pesticide waste handling including MSDS and personal protective equipment as well as first aid.</p> <p><b>Scheme Smallholders:</b>  All agrochemical usage and waste handling were performed by TUS team from PT Inti Indosawit Subur. So, there are no pesticides handling and storage conducted by farmers and <i>Koperasi</i>.</p>	
<p>7.2.9</p>	<p><b>(C)</b> 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.  - Critical (Major) compliance -</p>	<p>Based on interview with stakeholder and field observation, there was no pesticide applied aerially in Tungkal Ulu Estate.</p> <p>Besides that, based on document "<i>Data Pemakaian Pestisida Kebun Tungkal Ulu</i>" and interview with company representatives, it was found during 2022 and 2023 there were no aerial application of pesticide throughout the company plantation.</p> <p><b>Scheme Smallholders:</b>  Based on interview with Estate Management, local communities and field observation, there was no pesticide applied aerially in Tungkal Ulu Plasma.</p>	<p>Complied</p>
<p>7.2.10</p>	<p><b>(C)</b> Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.  - Critical (Major) compliance -</p>	<p>Annual medical check-up was conducted for all workers handling with chemical, such as pesticide, herbicide, and fertilizer.</p>	<p>Complied</p>

		<p>The latest medical check-up performed year 2023 – location at company medical healthcare attended by workers of fertilizer applicators, spraying applicator and PIC in pesticides storage. The MCU results are already known to estate management, so employees who are unfit will be consulted by a doctor. The result of MCU year 2023 has communicated to related workers by the Polyclinic. The result of MCU for workers who handling of chemical are in the category of fit for work, or the results of the examination are in “normal” condition.</p> <p><b>Scheme Smallholders:</b>          No specific annual medical surveillance for farmers due to all agrochemical usage and waste handling was performed by TUS team from PT Inti Indosawit Subur.</p>	
<p>7.2.11</p>	<p><b>(C)</b> 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.          - Critical (Major) compliance -</p>	<p>PT Inti Indosawit Subur – Tungkal Ulu and KUD’s prohibits pregnant or breast-feeding women to perform chemical spraying. To mitigate, estate performed monthly pregnancy test.</p> <p>PT Inti Indosawit Subur – Tungkal Ulu and KUD’s has also kept the record that spraying is not conducted by pregnant or breast-feeding women. The company has been conducting PP Test (pregnant test) every month.</p> <p>Estate management has kept the record that spraying is not conducted by pregnant or breast-feeding women. Female workers is voluntary to own test for menstrual cycle and informed Polyclinic to be review by nurse and recorded in monthly basis.</p> <p><b>Scheme Smallholders:</b>          Most farmer members of Tungkal Ulu Smallholder were not directly conducted pesticide application and handling. Spraying works (pesticide application) in smallholder area were performed mostly by spraying team called TUS from PT Inti Indosawit Subur – Tungkal Ulu Estate.</p>	<p>Complied</p>

**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>- Minor compliance -</p>	<p>There are no changes of compliance statement compared to last year audit.</p> <p>PT Inti Indosawit Subur – Tungkal Ulu POM and Estate has a waste management plan, identifying type and source of waste and the disposal plan. PT Inti Indosawit Subur – Tungkal Ulu POM and Estate prepared a procedure to handle hazardous waste titled "Prosedur Penanganan Limbah B3" No. AA-KL06-EFP explains methods to collecting the waste, recording in balance and disposal through licensed third-party transporter. The company store hazardous waste in temporary storage with permit based on "Surat Keputusan Kepala Dinas Penanaman Modal dan Pelayanan Terpadu Satu Pintu Kabupaten Tanjung Jabung Barat Nomor : 503/A.2.2/323/PMPTSP/2019" dated 22 October 2019 and valid for 5 years (Tungkal Ulu Estate) and "Surat Keputusan Kepala Dinas Penanaman Modal dan Pelayanan Terpadu Satu Pintu Kabupaten Tanjung Jabung Barat Nomor : 503/A.2.2/326/PMPTSP/2019" dated 22 October 2019 and valid for 5 years (Tungkal Ulu Mill).</p> <p>The hazardous waste is sent to the registered collector/transporter which approved by Environmental Ministry, namely PT. Hazmat Techno Indonesia.</p> <p>There is a mechanism "Mekanisme Penanganan Sampah Domestik" to segregate organic and inorganic waste, further to re-use or re-cycle inorganic domestic waste (such as plastic) and composting the organic domestic waste. Company has disseminated the mechanism of domestic waste handling to all employee and resident of emplacement. Domestic waste resulted from domestic housing resident segregated activity. The</p>	<p>Complied</p>
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		<p>company provides organic and inorganic trash cans in each housing area. There are personnel/workers who have been trained to collect the organic and inorganic waste and transport to landfill (TPSA).</p> <p>Waste and pollution sources have been identified and documented, including used lubricant and filter, old battery, used laboratory chemical, clinical/medical waste, mill effluent, EFB, smoke, dust, fiber and shell, empty agrochemical container, boiler ash, scrap iron, used tires, waste water and domestic household refuse. Record of identification was presented in "Risk and Environment Impact Assessment Register" updated January 2023.</p> <p>During field visit at permitted of temporary hazardous waste storage "TPS Limbah B3" in Tungkal ulu Palm Oil Mill, all chemicals empty containers are placed in storage properly.</p> <p><b>Scheme Smallholder:</b></p> <p>Plasma Tungkal Ulu has set the Environmental aspect and impact assessment as per "Evaluasi Aspek Dampak Lingkungan Kebun Plasma Tungkal Ulu" per February 2023. The mitigation plan for environmental aspect and impact has been defined, e.g:</p> <ul style="list-style-type: none"> <li>➤ Manuring/Fertilizing – monitoring ex fertilizer sack, appropriate fertilizing as recommendation</li> <li>➤ Weeds control - Ex Herbiicide container store in the hazardous waste storage.</li> <li>➤ Pest and disease handling: Ex pesticide container store in the hazardous waste storage</li> <li>➤ FFB transportation: optimizing FFB transportation by designed the TPH (FFB collecting place) in one way along collection road.</li> </ul> <p>During site visit, Smallholder are well aware of the environmental impacts and the mitigation plan. For example, the used fertilizer sack must be handled by collected in Cooperative office to reuse as loose fruit container.</p>	
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<p>7.3.2</p>	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p> <p>- Minor compliance -</p>	<p>The hazardous waste is sent to the registered collector/transporter which approved by Environmental Ministry. Document of agreements and third parties' licenses:</p> <ul style="list-style-type: none"> <li>• SPK for Transport and Management of LB3 between PT Inti Indosawit Subur and PT Hazmat Techno Indonesia and PT Pengolahan Limbah Industri Bekasi No. 06/SPJ/LEG-IIS/I/23 dated 2 January 2023. The agreement period starts from 1 January 2023 – 31 December 2024.</li> <li>• PT Hazmat Techno Indonesia – B3 Waste Transportation and/or B3 waste collection based on the Decree of the Director General of Land Transportation No. SK.00107/AJ.309/I/DJPD/2018 dated May 9, 2018 is valid for 5 years and the Approval Letter from the Investment Service and One Stop Integrated Licensing Service Number 660/1798.</li> <li>• SPK for Transport and Management of LB3 between PT Inti Indosawit Subur and PT Hazmat Techno Indonesia and PT Putra Restu Ibu Abadi No. 08/SPJ/LEG-IIS/I/23 dated 2 January 2023. The agreement period starts from 1 January 2023 – 31 December 2024.</li> <li>• PT Hazmat Techno Indonesia – B3 Waste Transportation and/or B3 waste collection based on the Decree of the Director General of Land Transportation No. SK.00107/AJ.309/I/DJPD/2018 dated May 9, 2018 is valid for 5 years and the Approval Letter from the Investment Service and One Stop Integrated Licensing Service Number 660/1798.</li> <li>• PT Pengolahan Limbah Industri Bekasi – B3 waste management services based on the Decree of the Minister of LHK RI No. S.31/Menlhk/Setjen/PLB.3/1/2019 dated January 21, 2019.</li> <li>• PT Hazmat Techno Indonesia – B3 Waste Transportation and/or B3 waste collection based on the Decree of the Director General of Land Transportation No. SK.00107/AJ.309/I/DJPD/2018 dated May 9, 2018 is valid for 5 years and the Approval Letter from the Investment Service and One Stop Integrated Licensing Service Number 660/1798.</li> </ul>	<p>Complied</p>
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		<ul style="list-style-type: none"> <li>• PT Putra Restu Abadi – B3 waste management services based on the Decree of the Minister of LHK RI No. S.575/Menlhk/Setjen/PLB.3/8/2020 dated 31 August 2020.</li> <li>• SPK for Transport and Management of LB3 between PT Inti Indosawit Subur with PT Hazmat Techno Indonesia and PT Trigunapratama Abadi No. 09/SPJ/LEG-IIS/I/23 dated 2 January 2023. The agreement period starts from 1 January 2023 – 31 December 2024</li> <li>• PT Trigunapratama Abadi – B3 waste management services based on the Decree of the Minister of LHK RI No S.1097/Menlhk/Setjen/PLB.3/12/2019 dated 23 December 2019.</li> </ul> <p>The verified manifest document are as follows: Transported on 4 April 2023</p> <ul style="list-style-type: none"> <li>• Manifest Festronik No. KLHK-1686320534 – used rags; hazardous waste code: B110d.</li> <li>• Manifest Festronik No. KLHK-1686320397 – used chemical containers; hazardous waste code: B104d.</li> <li>• Manifest Festronik No. KLHK-1686319790 – used oil; hazardous waste code: B105d.</li> <li>• Manifest Festronik No. KLHK-1686322002 – medical waste; hazardous waste code: A337-1.</li> <li>• Manifest Festronik No. KLHK-1686382462– used battery; hazardous waste code: A102d.</li> </ul> <p>Records of Quarterly report of hazardous waste were seen and reviewed for Triwulan III- IV Y2022 and Triwulan I Y2023. Based on interview with workers who handles pesticides, they understood the disposal of empty pesticides containers, such as: Empty chemical</p>	
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		<p>containers re-used only for mixing purposes, unusable are triple rinsed, punctured and disposed to the approval collector.</p>	
<p>7.3.3</p>	<p>The unit of certification does not use open fire for waste disposal.          - Minor compliance -</p>	<p>There are no changes of compliance statement compared to last year audit.</p> <p><b>Mill and Estate:</b>          Tungkal Ulu POM and Estate does not use fire for waste management and disposal.</p> <p>Waste management plan is documented in "Rencana pengelolaan Limbah". Waste management consists of medical waste, domestic waste, and hazardous waste to reduce pollution into the environment. Company also prepares waste management plan according to procedure such as:</p> <ul style="list-style-type: none"> <li>➤ Domestic waste, managed by segregation of organic and inorganic waste, transport the waste to sanitary landfill.</li> <li>➤ Liquid domestic waste, managed by providing septic tank and trench each house.</li> <li>➤ Solid waste resulted from mill such as: shell and fiber used as boiler fuel, EFB applied to plantation used as mulched and organic fertilizer.</li> <li>➤ Liquid waste from mill managed by application to plantation as fertilizer (Land application).</li> <li>➤ Hazardous waste resulted from mill and estate managed by store in the temporary storage which has licensed and delivered to licensed transporter and collector.</li> <li>➤ Waste of used goods/scrap, collect and sell to vendors.</li> <li>➤ Air emission, water and soil pollutant managed by dust collector installation.</li> </ul> <p>The company has socialized to the workers and their families who are stay in housing complex to aware on the disposal of domestic waste to the separate waste bin (organic and an-organic). Based on field visits in estate and mill housing complex, it was found that organic and an-organic waste</p>	<p>Complied</p>

		<p>is separated in waste bin and also found no scattered waste. All domestic waste is disposed to the landfill (Tempat Pengumpulan Akhir Sampah).  Based on field visit at workers housing complex, domestic waste already collected in the landfill.</p> <p><b>Scheme Smallholder:</b>  No open fire use for waste management and disposal by scheme smallholders. Plasma Tungkal Ulu has set the Environmental aspect and impact assessment as per "Evaluasi Aspek Dampak Lingkungan Kebun Plasma Tungkal Ulu" February 2023. All the smallholder members have attended the training on waste management and disposal in the oil palm plantations.</p> <p>Operational control to prevent the pollution has been determined by Cooperative (KUD) according to procedure AA-KL-06-EFP "Penanganan Limbah Bahan Berbahaya dan Beracun". There is also a mechanism to handle domestic waste in KUD "Mekanisme Penanganan Sampah Domestik" to segregate organic and inorganic waste, further, to reuse or re-cycle inorganic domestic waste (such as plastic) and composting the organic domestic waste.</p> <p>Based on field observation sampled smallholder, it was found no use of open fire for waste disposal</p>	
<b>Criteria 7.4:</b> Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	<p>Good agricultural practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts is documented.</p> <p>- Minor compliance -</p>	<p>PT Inti Indosawit Subur – Tungkal Ulu Estate has procedures to maintain soil fertility to ensure optimal and sustained yield, there is no change related to the SOP, the SOPs e.g. SOP AA-APM-OP-1100.05-R3 dated 23 November 2016 (Konservasi Tanah dan Air explains Soil &amp; Water Conservation); SOP AA-APM-OP-1100.06-R6 dated 16 February 2017 ("<i>menanam kacangari</i>" related to Planting cover crops); SOP AA-APM-OP-1100.09.R5 dated 5 September 2016 ("<i>pemupukan</i>" related to Fertilizer application). Leaf samplings are taken annually to accurately capture palm</p>	Complied

		<p>nutrient requirement (both macro and micronutrient) and serve as source for fertilizer recommendation – fertilizer application (inorganic, compost, POME application, and empty fruit bunch) follows fertilizer recommendation. Another effort is to plant legume cover crop during replanting to keep soil humidity.</p> <p>During the ASA2.1 audit, it was 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 B19a Afdeling 2 using Dolomite with dosage 2 kg/palm (this is in accordance with fertilizer’s recommendation 2023). Fertilizer applicator has been trained to not applied fertilizer in riparian or water source to minimize environmental impact.</p> <p>In addition, management unit also applied POME application especially in early mature area to maintain soil fertility and increase production. The POME applied for Y2023 with dosage 800 m3/Ha/year. Other sample is land application, the land application officer ensures and control the effluent only applied in flatbed. The application out of flatbed area are strictly prohibited.</p> <p>Based on interview with smallholders, most of their plots is no longer applied with fertilizer due to in replanting preparation in 2023 – 2024.</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>- Minor compliance -</p>	<p>According to the Asian Agri’s agricultural policy, soil sampling conducted every 6 years while leaf sampling conducted annually. Soil sampling refers to R&amp;D AA IK Profil Tanah Rev.00 “Instruksi Kerja Pengambilan Sampel Tanah Asian Agri Group” dated 09/01/2016, the Work Instruction has explained that the soil sampling is conducted every 6 years and the document valid for 7 years.</p> <p>Based on document verification sighted the report of soil and leaf sampling in own estate and smallholders as follows:</p>	Complied

		<ul style="list-style-type: none"> <li>The last soil sampling conducted in June 2016. Parameter that tested is N, C, K, Ca, Mg and pH. For Year 2024, estate management has made a plan for taking soil samples as well as leaf samples.</li> <li>The last leaf sampling conducted on 15/08/2022. Parameter that tested is major element (Ash, N, P, K Mg, Ca) dan Minor element (B, Cu, Zn, Mn, Fe). Document observed are Foliar analysis report 185/INT/R&amp;D/AGT/L/22-Afd II dated 15/08/2022 with 29 samples, Foliar analysis report 185/INT/R&amp;D/AGT/L/22-Afd III dated 15/08/2022 with 25 samples, Foliar analysis report 185/INT/R&amp;D/AGT/L/22-Afd IV dated 15/08/2022 with 15 samples.</li> </ul> <p>Those reports are converted to be fertilizer recommendation by Asian Agri's Research and Development Department for Y2023.</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>- Minor compliance -</p>	<p>According to the Agricultural Policy Manual, certificate holder has a guidance in organic fertilizers such as Empty Fruit Bunch (EFB) and Palm Oil Mill Effluent (POME). Certificate holder has implemented EFB application in estate with dosage 30 – 50 ton/Ha in normal soil and POME with dosage 750 m<sup>3</sup>/Ha only Tungkal Ulu Estate which is near the Tungkal Ulu mill. POME application in Y2022 is 158,060 m<sup>3</sup> and Y2023 (until April) is 61,564 m<sup>3</sup>. EFB application in Y2022 is 46,984 m<sup>3</sup> and Y2023 (until April) is 16,467 m<sup>3</sup>.</p> <p>During this visit of ASA2.1, auditor has observed the application of organic and inorganic fertilizers, the application has followed the SOP.</p> <p><b>Scheme Smallholder:</b></p> <p>Based on interview with plasma manager during ASA2.1 obtain information that there is no longer EFB application at this time since their area include in replanting plan in 2020 and 2021.</p> <p>During the audit, there is no manuring schedule matched with audit date. However, auditor team was observed the manuring record. For example,</p>	Complied

		manuring record with using NPK dosage 1.5 kg/tree in KUD Karya Kita and KUD Karya Jaya.																																											
7.4.4	Records of fertilizer inputs are maintained. - Minor compliance -	<p>The result of leaf sampling analysis Y2023 and soil sampling analysis along with visual analysis, planting material, planting age and rain fall are considered in proposing the Fertilizer Recommendation.</p> <p>Tungkal Ulu Estate Y2023 (until May) for Mature Area</p> <table border="1" data-bbox="1093 544 1834 895"> <thead> <tr> <th>Type of Fertilizer</th> <th>Recommendation (Kg)</th> <th>Actual (Kg)</th> </tr> </thead> <tbody> <tr> <td>Hi-Kay</td> <td>161,870</td> <td>161,870</td> </tr> <tr> <td>Urea</td> <td>1,076,046</td> <td>515,052</td> </tr> <tr> <td>Kieserite</td> <td>30,589</td> <td>30,589</td> </tr> <tr> <td>MOP</td> <td>1,441,602</td> <td>710,969</td> </tr> <tr> <td>Dolomite</td> <td>830,942</td> <td>175,055</td> </tr> <tr> <td>HGFB</td> <td>72,973</td> <td>2,605</td> </tr> </tbody> </table> <p>Tungkal Ulu Estate Y2023 (until May) for immature Area</p> <table border="1" data-bbox="1093 983 1834 1369"> <thead> <tr> <th>Type of Fertilizer</th> <th>Recommendation (Kg)</th> <th>Actual (Kg)</th> </tr> </thead> <tbody> <tr> <td>Hi-Kay</td> <td>161,870</td> <td>161,870</td> </tr> <tr> <td>Urea</td> <td>1,076,046</td> <td>515,052</td> </tr> <tr> <td>Kieserite</td> <td>30,589</td> <td>30,589</td> </tr> <tr> <td>MOP</td> <td>1,441,602</td> <td>710,969</td> </tr> <tr> <td>Dolomite</td> <td>830,942</td> <td>175,055</td> </tr> <tr> <td>HGFB</td> <td>72,973</td> <td>2,605</td> </tr> </tbody> </table>	Type of Fertilizer	Recommendation (Kg)	Actual (Kg)	Hi-Kay	161,870	161,870	Urea	1,076,046	515,052	Kieserite	30,589	30,589	MOP	1,441,602	710,969	Dolomite	830,942	175,055	HGFB	72,973	2,605	Type of Fertilizer	Recommendation (Kg)	Actual (Kg)	Hi-Kay	161,870	161,870	Urea	1,076,046	515,052	Kieserite	30,589	30,589	MOP	1,441,602	710,969	Dolomite	830,942	175,055	HGFB	72,973	2,605	Complied
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Criteria 7.5: Practices minimise and control erosion and degradation of soils.		
7.5.1	<p><b>(C)</b> Maps that identify marginal and fragile soils, including steep sloped land are available.</p> <p>- Critical (Major) compliance -</p>	<p>During this ASA2.1 audit there is no revision of the soil map of the Tungkal Ulu as per Laporan Survey Tanah Semidetil as per <i>Area Perkebunan Kelapa Sawit PT. Inti Indosawit Subur Kebun Tungkal Ulu</i>, verified document namely:</p> <p><b>Estate:</b></p> <p>Soil Analysis carried out in September 2010. Reported under "<i>Laporan Survey Tanah Semidetil Area Perkebunan Kelapa Sawit PT. Inti Indosawit Subur Kebun Tungkal Ulu</i>". Based on the report, the physiographic location in plain with hilly tuffaceous sedimentary rocks. Lithology parent material is clay and sand. Topographic of the area is rolling to hilly. Natural fertility is low to medium.</p> <p>PT Inti Indosawit Subur Tungkal Ulu has "<i>Peta Satuan Peta Tanah PT Inti Indosawit Subur Kebun Tungkal Ulu</i>" with scale 1 : 35,000. Based on soil suitability, consist of: S2 2,357.5 Ha (47.3%) with limiting factor of low natural fertility with low pH; S3 2,200.1 Ha (44.7%) with limiting factor of topographic condition (slope 15-30%); N1 (not suitable) 391.4 Ha (8%) with limiting factor of slope more than 30%. Based on soil survey semi detail, soil classification in Tungkal Ulu Estate consist of:</p> <ul style="list-style-type: none"> <li>- <i>Typic Dystrudepts;</i></li> <li>- <i>Typic endoaquepts;</i></li> <li>- <i>Typic endoaquils;</i></li> <li>- <i>Typic hapludox;</i></li> <li>- <i>Typic hapludults;</i></li> <li>- <i>Typic kandiuults;</i></li> </ul> <p><b>Scheme Smallholder:</b></p> <p>Group manager has kept and maintain the soil map of Plasma Tungkal Ulu in the office. There are 3 series of soil type defined by Research and</p>

Complied

		<p>Development Asian Agri based on soil survey on April 2014 and soil survey semi detail in June 1998:</p> <ul style="list-style-type: none"> <li>- <i>Typic Dystrudepts</i></li> <li>- <i>Typic Kandiudults</i></li> <li>- <i>Typic Hapludults</i></li> </ul> <p>Soil map and soil survey result recorded in "<i>Laporan Survei Tanah Tinjau Kebun Plasma Tungkal Ulu</i>". PT Inti Indosawit Subur - Plasma Tungkal Ulu has "<i>Peta Satuan Peta Tanah PT Inti Indosawit Subur Kebun Plasma Tungkal Ulu</i>" with scale 1 : 70,000.</p> <p>Based on soil survey semi detail map and Field visit in Tungkal Ulu Estate, and interview to the management and scheme smallholders it can be shown that there is no fragile soil in Tungkal Ulu Estate.</p>	
7.5.2	<p>The replanting of palm oil is not conducted extensively on steep terrain in accordance with applicable regulations.</p> <p>- Minor compliance -</p>	<p>During ASA2.1 audit, based on field visit in undulating area areas known that the management unit has provide terrace contour for example in immature area Block D20b. The management unit also provide legume cover crop and frond stacking treatment minimize the soil erosion.</p>	Complied
7.5.3	<p>New palm oil planting is not conducted on steep terrain in accordance with applicable regulations.</p> <p>- Minor compliance -</p>	<p>There is no new palm oil planting in Tungkal Ulu Estate. Company has a procedure SOP AA-APM-OP-1100.05-R3 dated 23 November 2016: <i>Konservasi Tanah dan Air</i> (Soil &amp; Water Conservation) as guidance for soil conservation in each topography. The slope in the plantation, between 0-30%. (Steep slope categorized as &gt;20° or 40%, Hilly slope between 13° – 20°. Terracing made in the slope 10° – 15°).</p> <p>No planting conducted in the steep slope &gt; 20° or 40%.</p>	Complied
<p><b>Criteria 7.6:</b> Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.</p>			
7.6.1	<p><b>(C)</b> Evidence of long-term land suitability for oil palm cultivation, soil maps or soil surveys that identify marginal and fragile soils, including steep terrain are available, in planning and operations.</p>	<p>In this ASA2.1 audit, there is no changing on the document of Long-term land suitability for oil palm cultivation, soil maps or soil surveys that identify marginal and fragile soils, including steep terrain.</p>	Complied

	<p>- Critical (Major) compliance -</p>	<p>In procedure no. AA-SOP-OP-1100-05.R3 "Konservasi Tanah dan Air" has determined strategy control erosion particular in slope area, such as: 0 – 5°, 6 – 12°, 13 -20° and more than 20°. Steep slope categorized as &gt;20° or 40%, Hilly slope between 13° – 20°. Terracing made in the slope 10° – 15°). The company has applied silt pit, L shape stacking frond and terracing in slope area to reduce soil erosion.</p> <p>Based on soil analysis, there is no fragile soil in PT Inti Indosawit Subur – Tungkal Ulu Estate. Based on the report of soil analysis 2010, 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. Based on "Peta Satuan Peta Tanah PT Inti Indosawit Subur Kebun Tungkal Ulu" with scale 1 : 35,000 the predominant soil type consists of:</p> <ul style="list-style-type: none"> <li>- Typic Dystrudepts;</li> <li>- Typic endoaquepts;</li> <li>- Typic endoaquils;</li> <li>- Typic hapludox;</li> <li>- Typic hapludults;</li> <li>- Typic kandiudults;</li> </ul> <p><b>Scheme Smallholder:</b></p> <p>Group manager has kept and maintain the soil map of Plasma Tungkal Ulu in the office. There are 3 series of soil type defined by Research and Development Asian Agri based on soil survey on April 2014 and soil survey semi detail on June 1998:</p> <ul style="list-style-type: none"> <li>- <i>Typic Dystrudepts</i></li> <li>- <i>Typic Kandiudults</i></li> <li>- <i>Typic Hapludults</i></li> </ul>	
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		<p>Soil map and soil survey result recorded in "<i>Laporan Survei Tanah Tinjau Kebun Plasma Tungkal Ulu</i>". PT Inti Indosawit Subur - Plasma Tungkal Ulu has "<i>Peta Satuan Peta Tanah PT Inti Indosawit Subur Kebun Plasma Tungkal Ulu</i>" with scale 1 : 70,000.</p> <p>During this audit, auditor has been confirmed that there is no new planting (land extension) of PT Inti Indosawit Subur or plasma area. It is only replanting activity that conducted in 2015.</p> <p>According to the type of soil in Plasma Tungkal Ulu, there is no fragile soil identified in plasma area of Tungkal Ulu.</p>	
7.6.2	<p>Extensive planting on marginal and fragile soils is avoided or, if necessary, carried out according to the best-practice soil management plan.</p> <p>- Minor compliance -</p>	<p>During this ASA2.1 audit, auditor has been confirmed that there is no new planting (land extension) of PT Inti Indosawit Subur or plasma area. It is only replanting activity that conducted in 2016, 2017, 2018 2019, 2020 and 2021. Replanting activity in steep area using a terrace contour for soil conservation.</p>	Not Applicable
7.6.3	<p>Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.</p> <p>- Minor compliance -</p>	<p>PT IIS – Tungkal Ulu Estate has conducted soil survey and mapping the topography. Soil map and soil survey result recorded in "<i>Laporan Survei Tanah Tinjau Kebun Plasma Tungkal Ulu</i>". PT Inti Indosawit Subur - Plasma Tungkal Ulu has "<i>Peta Satuan Peta Tanah PT Inti Indosawit Subur Kebun Plasma Tungkal Ulu</i>" with scale 1 : 70,000. Topography map is available, the slope in the plantation, between 0-30%. (Steep slope categorized as &gt;20° or 40%, Hilly slope between 13° – 20°. Terracing made in the slope 10° – 15°).</p> <p>In the planning of drainage and irrigation systems, roads and other infrastructure are based on soil survey and topographic information.</p>	Not Applicable
<p><b>Criteria 7.7:</b> No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.</p>			
7.7.1	<p><b>(C)</b> No new planting on peatlands, regardless of depth, after 15 November 2018, in existing plantation areas, as well as in new development areas.</p> <p>- Critical (Major) compliance -</p>	<p>There is no change of compliance statement compared to last year audit. There is no new planting in PT IIS – Tungkal Ulu until this recertification audit. In addition, there is no peat soil in Tungkal Ulu Estate. Based on the semi-detailed soil analysis, the soil type falls into loam and clay. Based</p>	Not Applicable

		<p>on soil survey semi detail, soil classification in Tungkal Ulu Estate consist of:</p> <ul style="list-style-type: none"> <li>- <i>Kompleks Typic Dystrudepts</i></li> <li>- <i>Typic Endoaquepts</i></li> <li>- <i>Typic Endoaquils</i></li> <li>- <i>Typic Hapludox</i></li> <li>- <i>Typic Hapludults</i></li> <li>- <i>Typic Kandiudults</i></li> </ul> <p>There is no peat soil identified within PT. Inti Indosawit Subur – Tungkal Ulu Estate.</p> <p><b>Scheme Smallholder:</b></p> <p>Based on soil survey performed by Asian Agri Research and Development, it was verified that there is no peat soil indicated in Tungkal Ulu Scheme Smallholder. There are 3 series of soil type defined by Research and Development Asian Agri based on soil survey on April 2014 and soil survey semi detail on June 1998:</p> <ul style="list-style-type: none"> <li>- <i>Typic Dystrudepts</i></li> <li>- <i>Typic Kandiudults</i></li> <li>- <i>Typic Hapludults</i></li> </ul> <p>There is no peat soil at Scheme Smallholders PT IIS – Tungkal Ulu.</p>	
7.7.2	<p>Peat areas within the managed area are inventoried, documented and reported to the RSPO Secretariat (effective from November 15, 2018).</p> <p>- Minor compliance -</p>	<p>There is no change of compliance statement compared to last year audit. There is no new planting in PT IIS – Tungkal Ulu until this recertification audit. In addition, there is no peat soil in Tungkal Ulu Estate. Based on the semi-detailed soil analysis, the soil type falls into loam and clay. Based on soil survey semi detail, soil classification in Tungkal Ulu Estate consist of:</p> <ul style="list-style-type: none"> <li>- <i>Kompleks Typic Dystrudepts</i></li> <li>- <i>Typic Endoaquepts</i></li> </ul>	Not Applicable

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<p><b>PROCEDURAL NOTE:</b> Maps and other documentation for peatlands are provided, prepared and shared according to the RSPO Working Group (Peatland Working Group / PLWG) audit guide (See Procedural Notes for Indicator 7.7.5 below).</p>			
<p>7.7.3</p>	<p><b>(C)</b> Subsidence of peat is monitored, documented and minimised.</p> <ul style="list-style-type: none"> <li>- Critical (Major) compliance -</li> </ul>	<p>There is no change of compliance statement compared to last year audit.</p> <p>There is no new planting in PT IIS – Tungkal Ulu until this recertification audit. In addition, there is no peat soil in Tungkal Ulu Estate. Based on the semi-detailed soil analysis, the soil type falls into loam and clay. Based on soil survey semi detail, soil classification in Tungkal Ulu Estate consist of:</p> <ul style="list-style-type: none"> <li>- <i>Kompleks Typic Dystrudepts</i></li> <li>- <i>Typic Endoaquepts</i></li> <li>- <i>Typic Endoaquils</i></li> </ul>	<p>Not Applicable</p>

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7.7.4	<p><b>(C)</b> Availability of implementation evidence of the water and land cover management program.</p> <ul style="list-style-type: none"> <li>- Critical (Major) compliance -</li> </ul>	<p>There is no change of compliance statement compared to last year audit. There is no new planting in PT IIS – Tungkal Ulu until this recertification audit. In addition, there is no peat soil in Tungkal Ulu Estate. Based on the semi-detailed soil analysis, the soil type falls into loam and clay. Based on soil survey semi detail, soil classification in Tungkal Ulu Estate consist of:</p> <ul style="list-style-type: none"> <li>- <i>Kompleks Typic Dystrudepts</i></li> <li>- <i>Typic Endoaquepts</i></li> <li>- <i>Typic Endoaquils</i></li> <li>- <i>Typic Hapludox</i></li> <li>- <i>Typic Hapludults</i></li> <li>- <i>Typic Kandiudults</i></li> </ul>	Not Applicable

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<p>7.7.5</p>	<p><b>(C)</b> 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> <ul style="list-style-type: none"> <li>- Critical (Major) compliance -</li> </ul>	<p>There is no change of compliance statement compared to last year audit. There is no new planting in PT IIS – Tungkal Ulu until this recertification audit. In addition, there is no peat soil in Tungkal Ulu Estate. Based on the semi-detailed soil analysis, the soil type falls into loam and clay. Based on soil survey semi detail, soil classification in Tungkal Ulu Estate consist of:</p> <ul style="list-style-type: none"> <li>- <i>Kompleks Typic Dystrudepts</i></li> <li>- <i>Typic Endoaquepts</i></li> <li>- <i>Typic Endoaquils</i></li> <li>- <i>Typic Hapludox</i></li> <li>- <i>Typic Hapludults</i></li> <li>- <i>Typic Kandiuults</i></li> </ul> <p>There is no peat soil identified within PT. Inti Indosawit Subur – Tungkal Ulu Estate.</p> <p><b>Scheme Smallholder:</b></p>	<p>Not Applicable</p>

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<p><b>PROCEDURAL NOTE:</b> For 7.7.5: Detailed information on the RSPO Drainability Assessment Guide along with related concepts and detailed actions is contained in the Guidelines currently being adjusted / tested by the RSPO Working Group on Peatlands (Peatland Working Group / PLWG). The final version must obtain PLWG approval in January 2019 and will include additional Guide on the steps to be followed after deciding not to replant and the consequences for other stakeholders, farmers, local communities, and the unit of certification concerned. It is recommended that the trial methodology period is proposed to be extended for 12 months for all relevant management units (ie management units that have plantations on peat) to utilize the methodology and provide input to PLWG so that existing procedures can be further refined as needed before January 2020. The unit of certification has the option to delay replanting until the issuance of the revised Guidelines for the guidelines. Additional guidance for alternative commodity crops and rehabilitation of natural vegetation will be regulated by the PLWG.</p>			
<p>7.7.6</p>	<p><b>(C)</b> All existing plantations on peat are managed according to applicable laws and/or "RSPO Guidelines for Best Management Practices (BMP) for Oil Palm Cultivation that are already on Peatlands", version 3 (June 2019) along with related audit guidelines (May 2019).          - Critical (Major) compliance -</p>	<p>There is no change of compliance statement compared to last year audit. There is no new planting in PT IIS – Tungkal Ulu until this recertification audit. In addition, there is no peat soil in Tungkal Ulu Estate. Based on the semi-detailed soil analysis, the soil type falls into loam and clay. Based on soil survey semi detail, soil classification in Tungkal Ulu Estate consist of:</p> <ul style="list-style-type: none"> <li>- <i>Kompleks Typic Dystrudepts</i></li> <li>- <i>Typic Endoaquepts</i></li> <li>- <i>Typic Endoaquils</i></li> <li>- <i>Typic Hapludox</i></li> <li>- <i>Typic Hapludults</i></li> <li>- <i>Typic Kandiudults</i></li> </ul>	<p>Not Applicable</p>

		<p>There is no peat soil identified within PT. Inti Indosawit Subur – Tungkal Ulu Estate.</p> <p><b>Scheme Smallholder:</b>          Based on soil survey performed by Asian Agri Research and Development, it was verified that there is no peat soil indicated in Tungkal Ulu Scheme Smallholder. There are 3 series of soil type defined by Research and Development Asian Agri based on soil survey on April 2014 and soil survey semi detail on June 1998:</p> <ul style="list-style-type: none"> <li>- <i>Typic Dystrudepts</i></li> <li>- <i>Typic Kandiudults</i></li> <li>- <i>Typic Hapludults</i></li> </ul> <p>There is no peat soil at Scheme Smallholders PT IIS – Tungkal Ulu.</p>	
<p>7.7.7</p>	<p><b>(C)</b> All peat areas not planted and reserved in managed areas (regardless of depth) are protected as 'peatland conservation areas'; unit of certification are prohibited from constructing drainage channels, building roads and new electricity lines on peatlands; unless if it is for a non- corporate land clearance. Peatlands are managed in accordance with 'RSPO Best Management Practices for the Management and Rehabilitation of Natural Vegetation related to Oil Palm Cultivation that already exists in Peatlands' (the latest version) along with relevant audit guidelines.</p> <ul style="list-style-type: none"> <li>- Critical (Major) compliance -</li> </ul>	<p>There is no change of compliance statement compared to last year audit. There is no new planting in PT IIS – Tungkal Ulu until this recertification audit. In addition, there is no peat soil in Tungkal Ulu Estate. Based on the semi-detailed soil analysis, the soil type falls into loam and clay. Based on soil survey semi detail, soil classification in Tungkal Ulu Estate consist of:</p> <ul style="list-style-type: none"> <li>- <i>Kompleks Typic Dystrudepts</i></li> <li>- <i>Typic Endoaquepts</i></li> <li>- <i>Typic Endoaquils</i></li> <li>- <i>Typic Hapludox</i></li> <li>- <i>Typic Hapludults</i></li> <li>- <i>Typic Kandiudults</i></li> </ul> <p>There is no peat soil identified within PT. Inti Indosawit Subur – Tungkal Ulu Estate.</p> <p><b>Scheme Smallholder:</b></p>	<p>Not Applicable</p>

		<p>Based on soil survey performed by Asian Agri Research and Development, it was verified that there is no peat soil indicated in Tungkal Ulu Scheme Smallholder. There are 3 series of soil type defined by Research and Development Asian Agri based on soil survey on April 2014 and soil survey semi detail on June 1998:</p> <ul style="list-style-type: none"> <li>- <i>Typic Dystrudepts</i></li> <li>- <i>Typic Kandiudults</i></li> <li>- <i>Typic Hapludults</i></li> </ul> <p>There is no peat soil at Scheme Smallholders PT IIS – Tungkal Ulu.</p>	
<p><b>Criteria 7.8:</b> Practices maintain the quality and availability of surface and groundwater.</p>			
<p>7.8.1</p>	<p>A water management plan is available and is implemented to support efficient use of water sources and continuous availability and avoid negative impacts on other users in the catchment. The plan referred to contains the following matters:</p> <ul style="list-style-type: none"> <li>- Minor compliance -</li> </ul> <p>7.8.1a The unit of certification does not limit access to clean water or does not pollute the water used by the community.</p>	<p>There is no change of compliance statement compared to last year audit. Updating data or information about the environment analysis result.</p> <p><b>Mill and Estate:</b></p> <p>The Certificate Holder and scheme Smallholder have established water management plan, consist of management water supply for domestic, water consumption and measurement of water quality.</p> <p>Identification water need as regulated in “Peraturan Menteri PU No.14/PRT/M/2010 (domestic consumption is 60 liters/person/day and water needed for mill processing, Ground and surface water resources and its permit, management and monitoring wastewater, included domestic wastewater.</p> <p>Company has obtained permit to use the surface water from Benanak River according to “Keputusan Kepala Dinas Penanaman Modal dan Pelayanan terpadu Satu Pintu provinsi Jambi Nomor 149/KEP.KA.DPM-PTSP-5.1/SIPAP/VIII/2018 Tentang Pemberian Izin Pengambilan dan Pemanfaatan Air Permukaan Pada Sungai Benanak Kepada PT Inti Indosawit Subur” dated 23 August 2018, valid until 5 years since issued.</p>	<p>Complied</p>



		<p>The Company has a water management document, both in the estate and mill. Monitoring the implementation of water management has been implemented on a regular basis, such as surface water quality monitoring each semester at Benanak river and Lampisi river (upstream and downstream) are available in the report of RKL/RPL. Company has analysed water quality each semester to ensure the compliance against PP No. 82 tahun 2001 regarding water quality standard, the result of water quality monitoring for Semester 2/2022 by Laboratory PT. ITEC Solution Indonesia shown that water quality is complies with national regulation.</p> <p>Procedure SOP AA-APM-OP-1100.05. R1 "Konservasi Tanah dan Air" has been established to maintain the quality and availability of water. Procedures was also established for protection and management of riparian buffer zones at or before replanting. Procedure mentioned that in 50m on the left and right side of riparian buffer zones, estates are prohibited to apply agrochemical, used manual manuring and riverbank was planted by erosion barrier crop (planting of "vetiver" grass, <i>Pheronema canescens</i> and <i>Bamboosa sp</i>). The organisation also has policy that prohibits estates for planting 50m on the left and right side of riparian buffer zones at or before replanting. Warning board placed regarding prohibition to apply agrochemicals and fertiliser in the buffer zone. Riparian buffers of small natural water courses were 50 metres wide on both sides of the rivers as defined in the procedure AA-KL-12-EFP "Restorasi Riparian dan Areal Sekitar Danau/Waduk atau Mata Air lainnya". Several evidence of maintaining quality and availability of water were evident, such as plan and realisation of riparian management, installation of warning boards, planting erosion prevention plan (e.g. <i>Pheronema canescens</i>, <i>Terminalia cattapa</i>, <i>Bamboosa sp</i> and vetiver grass) and monitoring of water quality.</p> <p>PT Inti Indosawit Subur – Tungkal Ulu does not limit access to clean water or does not pollute the water used by the community. Company has monitor clean water quality each semester to ensure the water use by</p>	
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		<p>community and employee are met with standard Permenkes No. 32 Tahun 2017 regarding clean water quality standard. Latest analysis for Semester 2/2022 by Laboratory PT. ITEC Solution Indonesia shown that water quality is met with the standard.</p> <p>In Mill scope, water consumption for FFB processing is more concern to ensure the water use is in line with budget. While in Estate scope, water quality is more preferred to prevent any pollution impact environmentally.</p> <p>Certificate of environmental analysis in Semester II 2022, such as:</p> <ul style="list-style-type: none"> <li>• Clean water, report of analysis D.08.1510-2/LHU/2022 dated 13 September 2022, the result complied to Permenkes No. 492/MENKES/Per/IV/2010</li> <li>• Surface water, report of analysis No. D.08.1510-2/LHU/2022 dated 13 September 2022, the result complied to PP RI No. 22 tahun 2021 (Lampiran VI)</li> </ul> <p><b>Scheme Smallholder:</b></p> <p>For Smallholder, water management applied is focused on protection of riparian zone. The activity is only maintained the riparian zone from pesticides application.</p>	
	<p>7.8.1b Workers have adequate access to clean water.</p>	<p>There is no change of compliance statement compared to last year audit. Updating data or information about the environment analysis result.</p> <p>According to field visit, company provided housing complex that adequate facilities has been available for mill workers, including: housing for staff, housing for workers (permanent and temporary), electricity from mill grid, clean water supply from water treatment plant (available for entire year), medical service in company's clinic, primary level education facility, religion and worship facility, and sport.</p> <p>Company provides the clean water for workers at housing areas with clean water from Tungkal Ulu Mill. Regular water analysis was performed to monitor the water quality. Water analysis performed by accredited laboratory "PT. ITEC Solution Indonesia" each semester for clean water.</p>	

		<p>Latest analysis for Semester 2/2022 by Laboratory PT. ITEC Solution Indonesia shown that water quality is met with the standard.</p> <p>Interview with workers during onsite audit confirmed that they have adequate access to clean water provide by company.</p> <p>Certificate of environmental analysis in Semester II 2022, such as:</p> <ul style="list-style-type: none"> <li>• Clean water, report of analysis D.08.1510-2/LHU/2022 dated 13 September 2022, the result complied to Permenkes No. 492/MENKES/Per/IV/2010</li> <li>• Surface water, report of analysis No. D.08.1510-2/LHU/2022 dated 13 September 2022, the result complied to PP RI No. 22 tahun 2021 (Lampiran VI)</li> </ul>	
<p>7.8.2</p>	<p><b>(C)</b> 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>- Critical (Major) compliance -</p>	<p>There are no changes of compliance statement compared to last year audit.</p> <p>PT Inti Indosawit Subur – Tungkal Ulu has establish management plan to protect water courses and wetlands, including securing and maintaining appropriate riparian.</p> <ul style="list-style-type: none"> <li>– Riparian restoration with forest vegetation plant/tree (<i>Pterocarpus indicus, pheronema canescens, vetiver, Terminalia cattapa, Ficus sp.</i>).</li> <li>– Establish zone for zero chemical. No spraying and fertilizing along riparian zone. Based on visit in riparian zone (Sempadan Sungai Benanak).</li> <li>– Conserve the natural vegetation in riparian zone.</li> <li>– Restricted to conduct replanting palm oil in riparian area.</li> </ul> <p>In this surveillance audit, the management plan still continued by the company and still relevant. During field visit to Sungai Benanak in Afd I&amp; Afd II, can be shown that riparian areas are well maintained, no chemical application near to riparian, no disturbance on riparian, natural vegetation are protected, and the signboard information and awareness are available.</p>	<p>Complied</p>

<p>7.8.3</p>	<p>Mill effluent is managed according to applicable regulations. The quality of mill effluent discharged, especially BOD (Biochemical Oxygen Demand) is monitored in accordance with applicable regulations.</p> <p>- Minor compliance -</p>	<p>Effluent from Tungkal Ulu Mill applied to plantation area as Land Application. Monitoring of effluent conducted in monthly period by PT Jambi Lestari International (KAN Accredited No: LP-1129-IDN). Analysis results for January – April 2023 are:</p> <table border="1" data-bbox="1093 464 1928 743"> <thead> <tr> <th>No</th> <th>Month</th> <th>pH</th> <th>BOD<sub>5</sub></th> <th>COD</th> <th>BOD Threshold Value</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Jan</td> <td>7.10</td> <td>291.29</td> <td>1,016.81</td> <td rowspan="4">5,000</td> </tr> <tr> <td>2</td> <td>Feb</td> <td>7.79</td> <td>984.11</td> <td>3326.07</td> </tr> <tr> <td>3</td> <td>March</td> <td>7.42</td> <td>1,024.99</td> <td>3,565.26</td> </tr> <tr> <td>4</td> <td>April</td> <td>6.85</td> <td>1,864.06</td> <td>6,126.37</td> </tr> </tbody> </table> <p><b>Scheme Smallholder:</b> Not applicable for scheme smallholder</p>	No	Month	pH	BOD <sub>5</sub>	COD	BOD Threshold Value	1	Jan	7.10	291.29	1,016.81	5,000	2	Feb	7.79	984.11	3326.07	3	March	7.42	1,024.99	3,565.26	4	April	6.85	1,864.06	6,126.37	<p>Complied</p>
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<p>7.8.4</p>	<p>Mill water use per tonne of FFB is monitored and recorded.</p> <p>- Minor compliance -</p>	<p>Tungkal Ulu 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, updated in December 2022. Also, record for January – May 2023.</p> <p><b>2022</b></p> <table border="1" data-bbox="1093 1054 1518 1356"> <thead> <tr> <th>Month</th> <th>Water use (M<sup>3</sup>)</th> </tr> </thead> <tbody> <tr> <td>January</td> <td>26,682</td> </tr> <tr> <td>February</td> <td>19,176</td> </tr> <tr> <td>March</td> <td>29,787</td> </tr> <tr> <td>April</td> <td>33,473</td> </tr> <tr> <td>May</td> <td>33,955</td> </tr> <tr> <td>June</td> <td>44,540</td> </tr> <tr> <td>July</td> <td>44,669</td> </tr> <tr> <td>August</td> <td>46,948</td> </tr> </tbody> </table>	Month	Water use (M <sup>3</sup> )	January	26,682	February	19,176	March	29,787	April	33,473	May	33,955	June	44,540	July	44,669	August	46,948	<p>Complied</p>									
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<b>Criteria 7.9:</b> Efficiency of fossil fuel use and the use of renewable energy is optimised																								
7.9.1	<p>Plans to increase the efficiency of fossil fuel use and to optimize renewable energy are available, monitored and documented.</p> <p>- Minor compliance -</p>	<p>All energy used in both mills is monitored and recorded under document of "Laporan Unit Pabrik Bulan". Fossil fuel records are maintained, and trends shown. Energy use records include accurate measurements of renewable energy use per tonne of FFB processed. All the shell and fibre is consumed internally as boiler fuel.</p> <p>Tungkal Ulu POM is using 100% fiber and most of shell production for power generation during FFB processing. The fiber and nutshell is by-product from CPO production. Tungkal Ulu POM has calculated the total energy required for process, based on FFB tonnage x steam required to process one ton FFB x energy required to generate one kg steam. Tungkal Ulu POM has also calculated the potential energy generated from using fibre and nutshell. From calculation it was known that there is energy surplus, whereby used as power generation when mill is in operation but not processing FFB (electricity source, cleaning, etc).</p> <p>Records of use renewable energy:</p> <table border="1"> <thead> <tr><th>Month</th><th>Fibre (ton)</th><th>Shell (ton)</th><th>EFB (Ton)</th></tr> </thead> <tbody> <tr><td>January</td><td>2,694</td><td>63</td><td>303</td></tr> </tbody> </table>	Month	Fibre (ton)	Shell (ton)	EFB (Ton)	January	2,694	63	303		Complied												
Month	Fibre (ton)	Shell (ton)	EFB (Ton)																					
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		February	2,188	155	249		
		March	2,420	84	287		
		April	2,623	24	293		
		May	4,116	24	462		
<p><b>Criteria 7.10:</b> 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><b>(C)</b> 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>- Critical (Major) compliance -</p>	<p>There are no changes regarding GHG identification and reduction plan.</p> <p>List for assessing pollution and emission sources, including gaseous, particles, soot emissions and effluent provided in document "Identifikasi Aspek Dampak Lingkungan untuk PMKS dan Estate di Tungkal Ulu", February 2023.</p> <p>There is no changing on GHG emission source in this recertification audit. The identification listed all relevant activities that generate pollution and emission from office, plantations, palm oil mill, mill effluent treatment up to workers activities, such as:</p> <ul style="list-style-type: none"> <li>▪ Boiler stack emission including particulate and soot</li> <li>▪ Diesel electric generator emission</li> <li>▪ POME methane emission</li> <li>▪ Use of fertilizer</li> <li>▪ Use of Pesticide</li> <li>▪ Diesel fuel usage</li> <li>▪ Vehicle and heave equipment emission</li> </ul> <p>All the activities of mill and estate as well as the waste generated has been well documented, for examples the operational activity from generator is generates air emissions, the company conducts periodic generator maintenance and perform quality measurement of exhaust emissions each semester to ensure air quality is comply with standard regulation.</p>	Complied				

		<p>The company has developed pollution and emission reduction plan. The plan covers planning, implementing plans and monitoring activities generating pollution and emission. Reduction of pollution such as:</p> <ul style="list-style-type: none"> <li>▪ POME application/Land application permitted for plantation in mineral soil.</li> <li>▪ Hazardous waste storage management and monitoring (permitted by government)</li> <li>▪ Domestic waste management by sanitary landfill</li> <li>▪ Emission measurement each semester from Boiler, Genset, Heavy equipment and vehicle.</li> <li>▪ Biogas Plant with capacity 3 MW.</li> </ul> <p><b>Scheme Smallholder:</b>  Document(s) assessing pollution and emission sources, including gaseous, particles, soot emissions and effluent has been provided by Group Manager Plasma Tungkal Ulu as per "<i>Identifikasi Sumber Polusi di Perkebunan Petani</i>" dated February 2023.</p>	
<p>7.10.2</p>	<p><b>(C)</b> 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).  - Critical (Major) compliance -</p>	<p>There is no new planting within certified area of PT Inti Indosawit Subur – Tungkal Ulu Estate and Tungkal Ulu Plasma after November 2005. Currently, replanting activities still in progress. Original year of Planting for Tungkal Ulu Estate are 1990, 1991, 1993 and 2003. While year of Planting for Tungkal Ulu Plasma are 1990, 1991, 1992, 1993 and 1994.  The information is still relevant since there is no new planting in this recertification audit.  This indicator is not applicable.</p>	<p>Complied</p>
<p>7.10.3</p>	<p><b>(C)</b> Other significant pollutant identification results are available and plans to reduce or minimize them are implemented and monitored.  - Critical (Major) compliance -</p>	<p>PT Inti Indosawit Subur – Tungkal Ulu POM has identified the significant pollutants and greenhouse gas (GHG) emissions. 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>Complied</p>

		Monitoring of air emissions and ambient air quality conducted every semester. Emissions test conducted testing by Accreditation Laboratory. The results of the analysis have been demonstrated and reported to Environmental Agency every six months.	
<b>Criteria 7.11:</b> Fire is not used for preparing land and is prevented in the managed area.			
7.11.1	<p><b>(C)</b> Land for new planting or replanting is not prepared by burning.</p> <p>- Critical (Major) compliance -</p>	<p>PT Inti Indosawit Subur – Tungkal Ulu POM established Company Policy signed by Managing Director, Kevin Tio, on 1 December 2014. Point 6 of the policy stated the company uses Zero Burning practice in developing plantation and actively support initiative to prevent and monitor forest fire and haze.</p> <p>Based on field observation, it was evident that no fire has been used for replanting in Tungkal Ulu Estate.</p> <p><b>Scheme Smallholders:</b></p> <p>The Smallholder Manager has prepared the policy that there were no land preparation by burning, as per “Kebijakan Manager Plasma Tungkal Ulu” dated 2 December 2020, in poin 6: “Melakukan praktek tanpa bakar dalam kegiatan pembangunan perkebunan dan petani maupun desa secara aktif mendukung inisiatif mencegah mengawasi kebakaran hutan dan asap” (Implementing non-burning practices in plantation development activities, farmers and villages actively support initiatives to prevent and control forest fires and smoke).</p> <p>Based on observation in smallholder plots that have been replanted, observed that replanting using mechanic method and not using fire.</p>	Complied
7.11.2	<p>The unit of certification establishes fire prevention and control measures for lands that are directly managed by the unit of certification.</p> <p>- Minor compliance -</p>	<p>PT Inti Indosawit Subur – Tungkal Ulu POM established Company Policy signed by Managing Director, Kevin Tio, on 1 December 2014. Point 6 of the policy stated the company uses Zero Burning practice in developing plantation and actively support initiative to prevent and monitor forest fire and haze.</p>	Complied



		<p>Based on field observation in this recertification audit, it was evident that no fire has been used for replanting in Tungkal Ulu Estate.</p> <p>In addition, company has performed and establishes fire prevention and control measures for whole area of company. Fire monitoring was done daily by Fire team and security to monitor the hotspot and fire by patrol to critical area of plantation. Company also implementing fire danger rating as early warning system.</p> <p>Tools and equipment of fire prevention has been prepared by company as per "Data Standar Peralatan Dalkarhutla Perusahaan Perkebunan" refers to Permentan RI No.05/2018.</p> <p><b>Scheme Smallholder:</b></p> <p>The Smallholder Manager has prepared the policy that there were no land preparation by burning, as per "Kebijakan Manager Plasma Tungkal Ulu" dated 2 December 2020, in poin 6: "Melakukan praktek tanpa bakar dalam kegiatan pembangunan perkebunan dan petani maupun desa secara aktif mendukung inisiatif mencegah mengawasi kebakaran hutan dan asap" (Implementing non-burning practices in plantation development activities, farmers and villages actively support initiatives to prevent and control forest fires and smoke).</p> <p>Based on observation in smallholder plots that have been replanted, observed that replanting using mechanic method and not using fire.</p>	
7.11.3	<p>The unit of certification engages stakeholders in adjacent locations for fire prevention and control measures.</p> <p>- Minor compliance -</p>	<p>PT Inti Indosawit Subur – Tungkal Ulu POM established Company Policy signed by Managing Director, Kevin Tio, on 1 December 2014. Point 6 of the policy stated the company uses Zero Burning practice in developing plantation and actively support initiative to prevent and monitor forest fire and haze.</p> <p>Based on field observation during this recertification audit, it was evident that no fire has been used for replanting in Tungkal Ulu Estate.</p>	Complied

		<p>PT Inti Indosawit Subur has a programme namely “Desa Bebas Api / Fire Free Village Programme (FFVP). Company recognize this engagement program, comprises the following segments:</p> <ul style="list-style-type: none"> <li>a. Increase community awareness. Company conduct intensive communication with the local community to increase awareness on the impact of fire and haze on health.</li> <li>b. Empowerment village head. During the dry season, villages play a significant role to synergize the prevention and mitigation of land fire.</li> <li>c. Provide support for land clearing.</li> <li>d. Appreciation for zero burning.</li> <li>e. Assistance to enhance local economy.</li> </ul> <p><b>Scheme Smallholder:</b></p> <p>The Smallholder Manager has prepared the policy that there were no land preparation by burning, as per “Kebijakan Manager Plasma Tungkal Ulu” dated 2 December 2020, in poin 6: “Melakukan praktek tanpa bakar dalam kegiatan pembangunan perkebunan dan petani maupun desa secara aktif mendukung inisiatif mencegah mengawasi kebakaran hutan dan asap” (Implementing non-burning practices in plantation development activities, farmers and villages actively support initiatives to prevent and control forest fires and smoke).</p> <p>Based on observation in smallholder plots that have been replanted, observed that replanting using mechanic method and not using fire.</p>	
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**Criteria 7.12:** Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.

**PROCEDURAL NOTE for 7.12:**

The RSPO Principles and Criteria 2018 include new requirements to ensure the effective contribution of the RSPO in stopping deforestation. This will be achieved by incorporating the High Carbon Stock Approach (HCSA) Approach Guide into the revised standard.

The RSPO ToC also encourages RSPO to commit to balancing between sustainable livelihoods and reducing poverty with the need to conserve, protect and improve the quality of ecosystems.

High Forest Cover Countries (HFCC) are in dire need of economic opportunities that can help people choose their own path in carrying out development, while at the same time providing social and economic benefits and safeguards.

Procedures will be developed that are adapted to support the development of sustainable palm oil by indigenous peoples and local communities who have legal or customary rights. The procedure will apply in certain HFCC countries and in the High Forest Cover Landscape (HFCL) within it.

The development of this procedure will be guided by the No Deforestation Joint Steering Group (NDJSG) between the RSPO and HCSA members. In HFCC countries, RSPO will work with governments, communities and other stakeholders to develop this procedure through participatory processes at national and regional levels. The duration of this activity is specified in the Terms of Reference for NDJSG and is publicly available.

<p>7.12.1</p>	<p><b>(C)</b> 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>- Critical (Major) compliance -</p>	<p>Until this audit ASA 2.1, there is no new planting conducted by Tungkal Ulu Estate and Tungkal Ulu Scheme Smallholder.</p> <p>There is no new planting within certified area of PT Inti Indosawit Subur – Tungkal Ulu Estate and Tungkal Ulu Plasma after November 2005. Currently, replanting activities still in progress. Original year of Planting for Tungkal Ulu Estate are 1990, 1991, 1993 and 2003. Wilst year of Planting for Tungkal Ulu Plasma are 1990, 1991, 1992, 1993 and 1994.</p> <p>Company has conducted HCV identification on 28 February – 11 March 2011 cooperation with “Fakultas Kehutanan Institut Pertanian Bogor”. Final report presented in “Laporan Final Kajian Penuh Identifikasi dan Analisis Keberadaan High Conservation Value di Areal PT. Inti Indosawit Subur – Tungkal Ulu Estate, Provinsi Jambi”. HCV identified in Tungkal ulu Estate total 128.322 ha, most of HCV identified are riparian.</p> <p>Company has a procedure of HCV management and monitoring. In addition, company has establish the procedure of Riparian as per “AA APM OP 1100.21.R2 dated 7 December 2015. Explain in point 4.3 of procedure that before replanting conducted, boundary marking of HCV shall be performed and mapping the HCV area to ensure that the HCV area protected and no replanting activity inside HCV/Riparian area. According to field observation in HCV area of Sungai Benanak and Sungai Lampisi</p>	<p>Complied</p>
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		<p>shown that HCV area boundary marking clearly visible and maintained and replanting activity was not overlapped to HCV area.</p>	
<p>7.12.2</p>	<p><b>(C)</b> HCV and HCS forests, and other conservation areas are identified as follows:          - Critical (Major) compliance -          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>There is no new planting within certified area of PT Inti Indosawit Subur – Tungkal Ulu Estate and Tungkal Ulu Plasma after November 2005. Currently, replanting activities still in progress. Original year of Planting for Tungkal Ulu Estate are 1990, 1991, 1993 and 2003. Whilst year of Planting for Tungkal Ulu Plasma are 1990, 1991, 1992, 1993 and 1994.</p> <p>During this surveillance audit ASA2.1, there is no changing in HCV area of Tungkal Ulu Estate and Scheme smallholder. Company has conducted HCV identification on 28 February – 11 March 2011 cooperation with “Fakultas Kehutanan Institut Pertanian Bogor”. Final report presented in “Laporan Final Kajian Penuh Identifikasi dan Analisis Keberadaan High Conservation Value di Areal PT. Inti Indosawit Subur – Tungkal Ulu Estate, Provinsi Jambi”.</p> <p>The HCV identification document has explained the general condition of landscape surrounding company’s plantation: there is no protected forest/ecosystem that feasible for wildlife to maintain its viability. Therefore, no recommendation for wildlife corridor.</p> <p>HCV identified in Tungkal ulu Estate total 128.322 ha including:</p> <ul style="list-style-type: none"> <li>- Benanak river 81.9 ha</li> <li>- Lampisi river 8.15 ha</li> <li>- Jitan river 4.48 ha</li> <li>- Serayu river 5.54 ha</li> <li>- Benanak 1 subriver 8.58 ha</li> <li>- Benanak 2 subriver 7.32 ha</li> <li>- Serayu subriver 3.04 ha</li> <li>- Water pond Tungkal Ulu Estate 2.06 ha</li> <li>- Makam Panjang Datuk Ratu (sacred cemetery) 0.0025 ha</li> </ul>	<p>Complied</p>

		<p>No HCV area identified in Scheme smallholder plantation, however HCV area identified in the surrounding of smallholder plantation in the village such as: public cemetery in Lampisi village, Tanjung Benanak village, Bukit Harapan village and Pinang Gading village..</p>	
	<p>7.12.2 b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the latest HCSA Toolkit and HCV-HCSA Assessment Manual that is applicable at the time of the assessment. This includes stakeholder consultation and take into account wider landscape- level consideration.</p>	<p>Until this surveillance audit ASA2.1audit, there is no new planting conducted by Tungkal Ulu Estate and Tungkal Ulu Scheme Smallholder. Land clearing is conducted for replanting on 2020 - 2021.</p> <p>Company has conducted HCV identification since 28 February – 11 March 2011 cooperation with “Fakultas Kehutanan Institut Pertanian Bogor”. According to HCV assessment result, confirmed that there is no High Forest Cover Landscapes (HFCLs).</p> <p>HCV identified in Tungkal ulu Estate total 128.322 ha consist of:</p> <p>HCV 1.2 and 4.1: Benanak river 81.9 ha, Lampisi river 8.15 ha, Jitan river 4.48, Serayu river 5.54 ha, Beranak-1 small river 8.58 ha, Beranak-2 small river 7.32 ha, Serayu small river 3.04 ha, pool water reservoir area.</p> <p>HCV 6. Makam Panjang Datuk ratu 0.0025 ha, Kuburan Desa Lampisi-1 (Lampisi I Village Graveyard) 0.5 ha, Kuburan Desa lampisi-2 (Lampisi II Village Graveyard) 0.5 ha, Kuburan Desa Tanjung Beranak (Tanjung Beranak Village Grveyard) 2 ha, Kuburan Desa Bukit Harapan (Bukit Harapan Village Graveyard) 0.25 ha, Kuburan Desa Pinang Gading (Pinang Gading Village Graveyard) 2 ha.</p> <p>The HCV identification document has explained the general condition of landscape surrounding company’s plantation: there is no protected forest/ecosystem that feasible for wildlife to maintain its viability. Therefore, no recommendation for wildlife corridor.</p>	
<p>7.12.3</p>	<p><b>(C)</b> In High Forest Cover Landscapes (HFCLs) within HFCCs, a specific procedure will apply for legacy cases and development by indigenous peoples and local communities with legal or customary rights, taking into consideration regional and national multi-stakeholder processes. Until this procedure is developed and endorsed, 7.12.2 applies.</p>	<p>According to HCV and HCS assessment there is no High Forest Cover Landscapes (HFCLs) within HFCCs identified.</p>	<p>Not Applicable</p>

- Critical (Major) compliance -			
<b>PROCEDURAL NOTE for 7.12.3:</b>			
Indicator 7.12.3. is not relevant to Indonesia, until further decisions by the RSPO.			
7.12.4	<p><b>(C)</b> Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An Integrated management plans to protect and/or enhance HCV and HCS forests, peatland and other conservation areas are developed, implemented and adapted if necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan was developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>- Critical (Major) compliance -</p>	<p>Until this surveillance audit ASA2.1, there is no new planting conducted by Tungkal Ulu Estate and Tungkal Ulu Scheme Smallholder. There is no new planting within certified area of PT Inti Indosawit Subur – Tungkal Ulu Estate and Tungkal Ulu Plasma after November 2005. Currently, replanting activities still in progress. Original year of Planting for Tungkal Ulu Estate are 1990, 1991, 1993 and 2003. Wilst year of Planting for Tungkal Ulu Plasma are 1990, 1991, 1992, 1993 and 1994.</p> <p>Company has conducted HCV identification since 28 February – 11 March 2011 cooperation with “Fakultas Kehutanan Institut Pertanian Bogor”. Final report presented in “Laporan Final Kajian Penuh Identifikasi dan Analisis Keberadaan High Conservation Value di Areal PT. Inti Indosawit Subur – Tungkal Ulu Estate, Provinsi Jambi”. HCV assessment was conducted in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations. HCV identified in Tungkal ulu Estate total 128.322 ha.</p> <p>The Company has made a conservation management and monitoring plan to protect and conserve RTE species and monitor the presence of wildlife species and wildlife populations as well as protected plants/animal in and around the plantation. Conservation management plan 2022/2023 has been review and well implemented. During field visit it was noted that HCV area are well managed, HCV boundary are visibly maintained, no disturbance of HCV area, no illegal hunting in HCV area, no replanting activity overlapped to HCV area.</p> <p>RTE species and wildlife monitoring is conducted monthly by foreman and clerk afedling/division. The animal/species findings are recorded in the "Daftar Temuan Satwa liar di Areal kebun" form. Evidence of wildlife monitoring can be demonstrated during audit. Since January - December</p>	Complied

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		<p>2022 monitoring, it was observed the presence of RTE species such as: <i>Macaca nemestrina</i>, <i>Halcyon smyrnensis</i>, <i>Todirhamphus chloris</i>, <i>Gracula religiosa</i>, <i>Aceros sp.</i>, <i>Anthreptes sp.</i>, <i>Alcedo meninting</i>, <i>Hylobates sp.</i>. During interview with workers, it was noted that there is no illegal hunting of animals and they have aware about RTE species protection and the prohibition of animal hunting in company area including HCV area.</p>	
7.12.5	<p>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> <p>- Minor compliance -</p>	<p>According to HCV Assessment February 2011 there is no rights of local communities identified in HCV areas. All HCV areas are inside the HGU of PT Inti Indosawit Subur – Tungkal Ulu. There is no changing on information of HCV area until this audit, the information from previous audit is still relevant.</p> <p>HCV identified in Tungkal ulu Estate total 128.322 ha consist of:</p> <p>HCV 1.2 and 4.1: Benanak river 81.9 ha, Lampisi river 8.15 ha, Jitan river 4.48, Serayu river 5.54 ha, Beranak-1 small river 8.58 ha, Beranak-2 small river 7.32 ha, Serayu small river 3.04 ha, pool water reservoir area.</p> <p>HCV 6. Makam Panjang Datuk ratu 0.0025 ha, Kuburan Desa Lampisi-1 (Lampisi I Village Graveyard) 0.5 ha, Kuburan Desa lampisi-2 (Lampisi II Village Graveyard) 0.5 ha, Kuburan Desa Tanjung Beranak (Tanjung Beranak Village Grveyard) 2 ha, Kuburan Desa Bukit Harapan (Bukit Harapan Village Graveyard) 0.25 ha, Kuburan Desa Pinang Gading (Pinang Gading Village Graveyard) 2 ha.</p> <p>PT Inti Indosawit Subur – Tungkal Ulu has maintained the HCV area identified and give the access to the surrounding community to come to the graveyard and make a grave pilgrimage.</p>	Not Applicable
7.12.6	<p>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</p>	<p>PT. Inti Indosawit Subur – Tungkal Ulu POM and Estate has a program to socialize the status of protected, rare, threatened or endangered (RTE) to all workers, it was also programed each year as per "Conservation Management Plan". Socialization has been conducted through master morning in each division by field assistant, latest refreshment to workers on 11 June 2022, 11 April 2022, August 2022 and through regular master</p>	Complied

	<p>working for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p>- Minor compliance -</p>	<p>morning. Company also provides signboard regarding HCV protection and RTE species protection in the strategic place as a campaign to give awareness to the workers/people.</p> <p>Company also implemented appropriate sanction disciplinary measures to any individual working for the company who is found to capture, harm, collect or kill these species. Sanction and process based on UU No. 5 tahun 1990.</p> <p>During interview with sampled workers confirmed that they have understanding on RTE species, can explain the type of RTE species, prohibition of animal hunting and protect the RTE species.</p> <p>The information from previous audit still relevant, company has implemented the regular program to educate the workforce about the status of RTE species.</p> <p><b>Scheme Smallholder:</b></p> <p>Training &amp; Socialization has been provided to the individual members about the status of HCV and RTE species and the applicable disciplinary measures. Training was conducted in each KUD by plasma management, sample seen: Socialization on May 2023 at KUD office, attend by each KUD representative. Interview with smallholder member during field audit, confirmed that they have sufficient understanding on RTE species protection and HCV area.</p>	
7.12.7	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p> <p>- Minor compliance -</p>	<p>There is no new planting within certified area of PT Inti Indosawit Subur – Tungkal Ulu Estate and Tungkal Ulu Plasma after November 2005. Currently, replanting activities still in progress. Original year of Planting for Tungkal Ulu Estate are 1990, 1991, 1993 and 2003. Wilst year of Planting for Tungkal Ulu Plasma are 1990, 1991, 1992, 1993 and 1994.</p> <p>Company has conducted HCV identification on 28 February – 11 March 2011 cooperation with “Fakultas Kehutanan Institut Pertanian Bogor”. Final report presented in “Laporan Final Kajian Penuh Identifikasi dan</p>	Complied



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		<p>Analisis Keberadaan High Conservation Value di Areal PT. Inti Indosawit Subur – Tungkal Ulu Estate, Provinsi Jambi”.</p> <p>HCV and wildlife/animal monitoring continuously conducted in a regular basis. Secondary monitoring conducted each month and primary monitoring conducted twice a year.</p> <p>Monitoring of animal/wildlife performed by HCV/Sustainability officer and field workers, result of monitoring presented in “laporan pemantauan Jenis satwa/tumbuhan”.</p> <p>Report of Management and Monitoring for HCV and RTEs is reported every 6 months and review is conducted regularly to ensure that monitoring is effective. Reports period semester I &amp; II year 2022 can be shown during audit. Results of monitoring was evaluated using trend evaluation. Monitoring RTE species in January - December 2022 observed 36 species of animal, 5 species are categorized as protected species: Owa kelawat (<i>Hylobates moloch</i>), Jelarang (<i>Ratufa sp</i>), Cekakak belukar (<i>Halcyon smirnsensis</i>), Beo (<i>Gracula religiosa</i>), Enggang (<i>Aceros sp</i>).</p> <p>Result of monitoring gives the feedback into the management plan improvement. The results from monitoring of wildlife, environmental, and socio-cultural services give feedback advice and recommendations to the management plan. Report of HCV and RTE species monitoring are reported to Balai Konservasi Sumberdaya Alam Jambi province on 19 January 2023.</p>	
7.12.8	<p><b>(C)</b> Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV- HCSA assessment since 15 November 2018, the Remediation and Compensation Procedures (RaCP) applies.</p> <p>- Critical (Major) compliance -</p>	<p>There is no new planting within certified area of PT Inti Indosawit Subur – Tungkal Ulu Estate and Tungkal Ulu Plasma after November 2005. Currently, replanting activities still in progress. Original year of Planting for Tungkal Ulu Estate are 1990, 1991, 1993 and 2003. Wilst year of Planting for Tungkal Ulu Plasma are 1990, 1991, 1992, 1993 and 1994.</p> <p>Company has conducted HCV identification on 28 February – 11 March 2011 cooperation with “Fakultas Kehutanan Institut Pertanian Bogor”. Final report presented in “Laporan Final Kajian Penuh Identifikasi dan</p>	Complied

		Analisis Keberadaan High Conservation Value di Areal PT. Inti Indosawit Subur – Tungkal Ulu Estate, Provinsi Jambi”. Therefore, RaCP is not applicable.	
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**Appendix B: GHG Reporting Executive Summary**

The GHG emissions that were produced in **2022** for Tungkal Ulu 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 **2022** for Tungkal Ulu POM and supply base are as following:

Emission per product	tCO <sub>2</sub> e/tProduct
CPO	-0.06
PKO	-0.06

Extraction	%
OER	20.64
KER	5.28

Production	t/yr
FFB Process	294,443.00
CPO Produced	60,772
PKO Produced	15,534

Land Use	Ha
OP Planted Area	13,625.00
OP Planted on peat	0.00
Conservation (forested)	0.00
Conservation (non-forested)	128.32
<b>Total</b>	<b>13,625.00</b>

**Summary of Field Emission and Sink**

	Own Crop*		Group		3 <sup>rd</sup> Party		Total	
	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB
<b>Emission</b>								
Land Conversion	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
CO <sub>2</sub> Emission from fertilizer	2,195.53	0.51	111.61	0.01	0.00	0.00	2,307.14	0.52
NO <sub>2</sub> Emission from fertilizer	1,834.79	0.42	18.54	0.00	0.00	0.00	1,853.33	0.42
Fuel Consumption	1,062.06	0.25	77.84	0.01	0.00	0.00	1,139.90	0.25
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Sink</b>								
Crop Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total</b>	<b>5,092.37</b>	<b>0.09</b>	<b>207.99</b>	<b>0.02</b>	<b>20,293.56</b>	<b>0.00</b>	<b>25,593.92</b>	<b>0.11</b>

*\*Note: Includes both estates and smallholders*

**Summary of Mill Emission and Credit**

	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB
<b>Emission</b>		
POME	15,683.16	0.05
Fuel Consumption	207.95	0.00
Grid Electricity Utilization	48.93	0.00
<b>Credit</b>		
Export of Grid Electricity	-0.35	0.00
Sales of PKS	-45,936.00	-0.16
Sales of EFB	0.00	0.00
<b>Total</b>	<b>-29,996.31</b>	<b>-0.11</b>

**Summary of Kernel Crusher Emission and Credit (if applicable)**

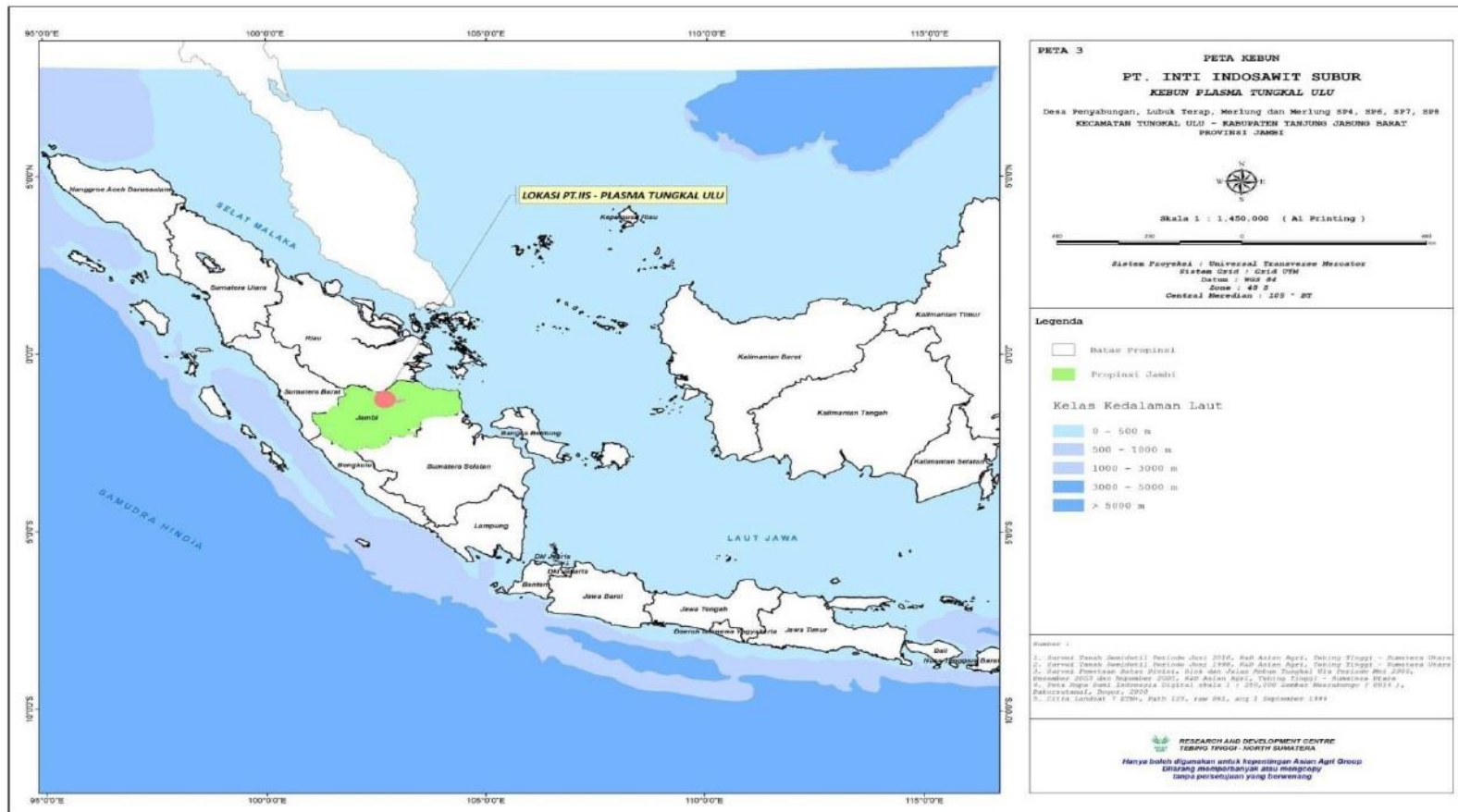
Emissions	tCO <sub>2</sub> e
PK from own mill	-1,416.82
PK from other source	0.00
Fuel Consumptions	0.00
<b>Total Crusher emissions</b>	<b>-1,416.82</b>

\*This mill has no kernel crusher operation.

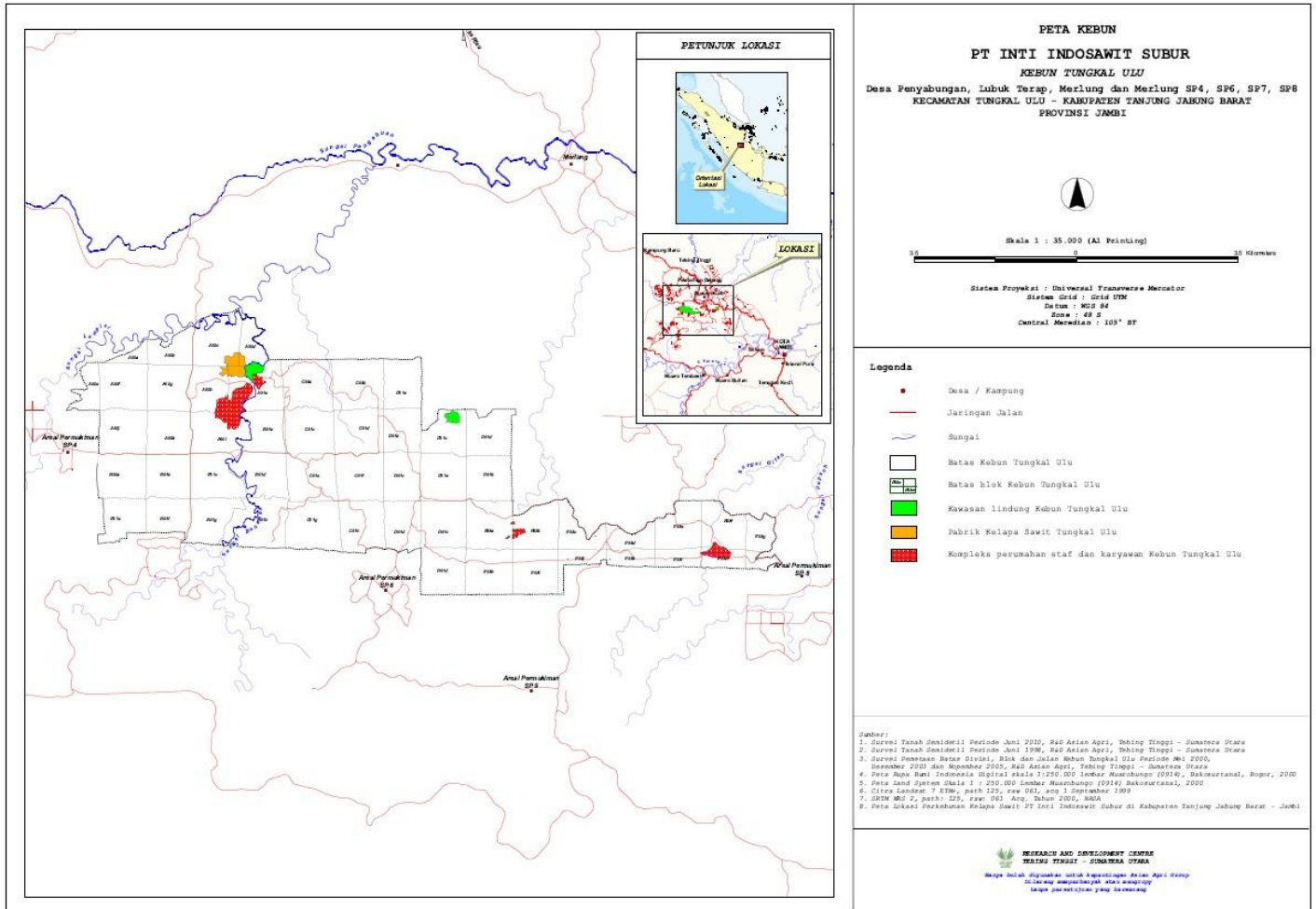
<b>Palm Oil Mill Effluent (POME) Treatment:</b>	
Divert to Compost (%)	0
Divert to anaerobic diversion (%)	100

<b>POME Diverted to Anaerobic Digestion:</b>	
Divert to anaerobic pond (%)	19
Divert to methane captured (flaring) (%)	2
Divert to methane captured (energy generation) (%)	79

**Appendix C: Location Map of Certification Unit and Supply bases**



**Appendix D: Estate Field Map**







**Appendix E: List of Smallholder Registered and/or sampled**

No	Name of farmer	Location (Village)	Plot Number ( <i>Hamparan</i> )	GPS Reference		Area Summary (Ha)		Forecasted annual FFB Production (MT)	Date of joining	Smallholder ID
				Latitude (S)	Longitude (E)	Total Certified Area	Planted Area			
<b>KUD Karya Kita</b>										
1	Supardi.1	Tanjung Benanak Village	15	1° 20' 16.5"	102° 57' 16.4"	2	2	-	1992	809
2	Supardi.1		15	1° 20' 15.4"	102° 57' 19.8"	2	2	-	1992	810
3	Diyanto		15	1° 20' 15.3"	102° 57' 39.9"	2	2	-	1992	815
4	Nahari		15	1° 20' 12.2"	102° 57' 26.5"	2	2	-	1992	824
5	Kartono		15	1° 20' 05.6"	102° 57' 23.1"	2	2	-	1992	811
6	Parno		15	1° 20' 08.0"	102° 57' 48.1"	2	2	-	1992	816
7	Lilik		15	1° 20' 12.6"	102° 57' 25.5"	2	2	-	1992	812
8	Ponidi		15	1° 20' 16.8"	102° 57' 27.3"	2	2	-	1992	816
9	Jumali		15	1° 20' 08.7"	102° 57' 42.0"	2	2	14.6	1992	814
10	Jekek		15	1° 20' 19.1"	102° 57' 22.5"	2	2	-	1992	825
11	Katni		16	1° 20' 22.2"	102° 57' 45.0"	2	2	-	1992	849
12	Buyadi		16	1° 20' 16.3"	102° 57' 49.8"	2	2	13.1	1992	830
13	Abdul Ngalim		16	1° 20' 27.2"	102° 57' 42.8"	2	2	-	1992	860
14	Vincensius Haryono		16	1° 20' 23.6"	102° 57' 21.6"	2	2	-	1992	856
15	Ahmad Tentram		16	1° 20' 23.6"	102° 57' 21.6"	2	2	-	1992	855
16	Sofyan		16	1° 20' 16.7"	102° 57' 37.9"	2	2	-	1992	828
17	Munaji		16	1° 20' 32.1"	102° 57' 38.5"	2	2	-	1992	863
18	Sobirin		16	1° 20' 30.0"	102° 57' 30.7"	2	2	-	1992	865
19	Winardi		16	1° 20' 27.4"	102° 57' 24.5"	2	2	-	1992	857
20	Hendro		18	1° 20' 07.6"	102° 58' 39.4"	2	2	-	1992	837
21	Suparmin		18	1° 20' 07.3"	102° 58' 41.7"	2	2	-	1992	838
22	Mansyurdin		18	1° 20' 08.2"	102° 58' 47.7"	2	2	-	1992	841
23	Jumadi		18	1° 20' 07.5"	102° 58' 48.9"	2	2	-	1992	842
24	Zahrudin		18	1° 20' 07.6"	102° 58' 43.8"	2	2	14.6	1992	839
25	Armin		18	1° 20' 09.0"	102° 58' 45.9"	2	2	14.6	1992	840
26	Wiyono		19	1° 21' 02.6"	102° 57' 57.0"	2	2	-	1992	899
27	Edi		19	1° 20' 59.1"	102° 57' 54.6"	2	2	-	1992	893
28	Nidam		19	1° 21' 01.2"	102° 57' 59.9"	2	2	-	1992	882
29	Hendi		19	1° 20' 47.7"	102° 58' 02.5"	2	2	-	1992	877
30	Parno		19	1° 21' 00.3"	102° 57' 47.2"	2	2	-	1992	895
31	Suyatno		19	1° 21' 07.2"	102° 57' 48.8"	2	2	-	1992	896



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				Latitude (S)	Longitude (E)	Total Certified Area	Planted Area			
32	Sutrisno		19	1° 21' 05.5"	102° 58' 02.0"	2	2	-	1992	879
33	Subur Radius		19	1° 20' 58.1"	102° 58' 05.3"	2	2	-	1992	883
34	Katiem		19	1° 20' 56.2"	102° 57' 53.1"	2	2	-	1992	880
<b>KUD Karya Jaya</b>										
1	Syawal	Bukit Harapan Village	2	1° 21' 38.5"	103° 00' 40.1"	2	2	14.9	1992	023
2	H. Sudarno		2	1° 21' 32.4"	103° 00' 44.5"	2	2	14.9	1992	025
3	Wito		2	1° 21' 34.2"	103° 00' 47.7"	2	2	14.9	1992	033
4	Slamet		2	1° 21' 38.4"	103° 00' 51.0"	2	2	14.9	1992	031
5	Sudarja		2	1° 21' 45.6"	103° 00' 34.4"	2	2	14.9	1992	035
6	Tukimin		2	1° 21' 35.2"	103° 00' 56.8"	2	2	14.9	1992	027
7	Muhammad Kholil		2	1° 21' 29.1"	103° 00' 47.9"	2	2	14.9	1992	026
8	Sukamto		2	1° 21' 40.4"	103° 00' 38.8"	2	2	14.9	1992	124
9	Tumino		2	1° 21' 45.2"	103° 00' 55.9"	2	2	14.9	1992	032
10	Syawal		2	1° 21' 47.6"	103° 00' 59.6"	2	2	14.9	1992	041
11	Jhonaiddi		7	1° 22' 23.3"	103° 00' 28.4"	2	2	14.8	1992	162
12	Masidi		7	1° 22' 11.8"	103° 00' 31.3"	2	2	14.8	1992	109
13	Romlah		7	1° 22' 09.6"	103° 00' 28.5"	2	2	14.8	1992	111
14	Wahono		7	1° 22' 07.7"	103° 00' 39.1"	2	2	14.8	1992	094
15	Bayu		7	1° 22' 30.3"	103° 00' 23.9"	2	2	14.8	1992	161
16	Antonius Suratno		7	1° 22' 16.4"	103° 00' 28.3"	2	2	14.8	1992	129
17	Tarno		7	1° 22' 03.8"	103° 00' 39.4"	2	2	14.8	1992	107
18	Suparno 2		7	1° 22' 08.7"	103° 00' 39.3"	2	2	14.8	1992	108
19	Ahmad		7	1° 22' 04.5"	103° 00' 31.8"	2	2	14.8	1992	160
20	Kliwon		7	1° 22' 09.6"	103° 00' 28.5"	2	2	14.8	1992	092
21	Suari Ahmad		12	1° 21' 25.7"	103° 01' 12.1"	2	2	-	1992	745
22	Sudi		12	1° 21' 18.2"	103° 01' 32.8"	2	2	-	1992	747
23	H. Ruhayat		12	1° 21' 20.2"	103° 01' 27.5"	2	2	-	1992	750
24	Dailami		12	1° 21' 24.6"	103° 01' 20.1"	2	2	-	1992	752
25	Triyanto		12	1° 21' 26.8"	103° 01' 16.2"	2	2	-	1992	753
26	Abdul Jabar		12	1° 21' 08.3"	103° 01' 24.0"	2	2	-	1992	696
27	Ujang		12	1° 21' 09.2"	103° 01' 34.6"	2	2	-	1992	699
28	Gatot Priyono		12	1° 21' 19.5"	103° 01' 20.2"	2	2	-	1992	756
29	Pujiono		12	1° 21' 08.6"	103° 01' 26.9"	2	2	-	1992	698
30	Yuyu Sudiono		12	1° 21' 14.3"	103° 01' 16.8"	2	2	-	1992	695

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No	Name of farmer	Location (Village)	Plot Number ( <i>Hamparan</i> )	GPS Reference		Area Summary (Ha)		Forecasted annual FFB Production (MT)	Date of joining	Smallholder ID	
				Latitude (S)	Longitude (E)	Total Certified Area	Planted Area				
31	Kecuk		19	1° 20' 56.0"	102° 57' 56.4"	2	2	-	1992	878	
32	Mun		19	1° 21' 02.6"	102° 57' 57.0"	2	2	-	1992	894	
33	Sriyono		19	1° 21' 09.2"	102° 57' 55.2"	2	2	-	1992	898	
34	Supri		19	1° 20' 58.2"	102° 57' 53.9"	2	2	-	1992	897	
<b>KUD Sari Bumi</b>											
1	Jumari	Adipurwa Village	4	1° 22' 12.8"	103° 02' 31.9"	2	2	17.8	1992	154	
2	Sularno		4	1° 22' 28.0"	103° 02' 36.9"	2	2	17.8	1992	259	
3	Suliyanto		4	1° 22' 22.8"	103° 02' 32.3"	2	2	17.8	1992	228	
4	Martinah		4	1° 22' 20.3"	103° 02' 39.8"	2	2	17.8	1992	199	
5	Supriyatmoko		4	1° 22' 33.6"	103° 02' 42.6"	2	2	17.8	1992	266	
6	Heri Suyoto		4	1° 22' 24.4"	103° 02' 28.5"	2	2	17.8	1992	217	
7	Indahono		4	1° 22' 32.9"	103° 02' 35.8"	2	2	17.8	1992	260	
8	Dwi Miswanto		4	1° 22' 17.5"	103° 02' 31.8"	2	2	17.8	1992	197	
9	Tukimin		6	1° 22' 43.8"	103° 02' 19.0"	2	2	18.3	1992	314	
10	Margono		6	1° 22' 33.8"	103° 02' 19.1"	2	2	18.3	1992	255	
11	Misniarno		6	1° 22' 33.1"	103° 02' 10.3"	2	2	18.3	1992	254	
12	Mustangin Komari		6	1° 22' 47.5"	103° 02' 25.9"	2	2	18.3	1992	256	
13	Daniel Sembiring		6	1° 22' 28.9"	103° 02' 27.5"	2	2	18.3	1992	257	
14	Wijiono		6	1° 22' 44.9"	103° 02' 15.0"	2	2	18.3	1992	305	
15	Yatimin		10	1° 22' 41.1"	103° 01' 41.1"	2	2	17.8	1992	280	
16	Helmi Stp		10	1° 22' 26.7"	103° 01' 41.2"	2	2	17.8	1992	247	
17	Martoyo		10	1° 22' 38.9"	103° 01' 45.2"	2	2	17.8	1992	278	
18	Susilono		10	1° 22' 22.1"	103° 01' 49.2"	2	2	17.8	1992	226	
19	Suseko		10	1° 22' 53.2"	103° 01' 52.9"	2	2	17.8	1992	226	
20	Martoyo		10	1° 22' 29.1"	103° 01' 36.5"	2	2	17.8	1992	246	
21	Ahmad Priyanto		Ibnu	10	1° 22' 31.9"	103° 01' 49.4"	2	2	17.8	1992	248
22	Sarnu		10	1° 22' 39.5"	103° 01' 54.0"	2	2	17.8	1992	277	
23	Marsudi		14	1° 21' 40.7"	103° 01' 11.6"	2	2	17.5	1992	961	
24	Sarwanto		14	1° 22' 07.0"	103° 01' 24.2"	2	2	17.5	1992	081	
25	Margono		14	1° 21' 58.5"	103° 01' 08.0"	2	2	17.5	1992	077	
26	Isniah Mahmudi		14	1° 21' 51.1"	103° 01' 03.8"	2	2	17.5	1992	073	
27	M. Ramli		14	1° 21' 40.7"	103° 01' 11.6"	2	2	17.5	1992	073	
28	Ngatmin		14	1° 21' 41.2"	103° 01' 04.2"	2	2	17.5	1992	053	

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				Latitude (S)	Longitude (E)	Total Certified Area	Planted Area			
29	Marjoni		14	1° 21' 43.3"	103° 01' 18.2"	2	2	17.5	1992	060
30	Sunardi		14	1° 21' 28.7"	103° 01' 08.0"	2	2	17.5	1992	040
31	Dedi Kurnia		15	1° 19' 34.8"	103° 06' 12.4"	2	2	9.2	1992	852
32	Sandung		15	1° 19' 41.1"	103° 06' 00.2"	2	2	9.2	1992	790
33	Karni		15	1° 19' 48.3"	103° 06' 10.9"	2	2	9.2	1992	846
34	H. Solikun		15	1° 19' 41.6"	103° 06' 19.1"	2	2	9.2	1992	818
<b>KUD Sawit Mulia</b>										
1	Hermawan	Desa Intan Jaya	2	1° 19' 04.1"	103° 06' 37.9"	2	2	9.4	1992	690
2	Adlan		2	1° 18' 57.7"	103° 06' 38.0"	2	2	9.4	1992	648
3	Azham		2	1° 18' 52.0"	103° 06' 56.9"	2	2	9.4	1992	608
4	Sya'ban		2	1° 19' 11.2"	103° 06' 34.9"	2	2	9.4	1992	674
5	Rahmad		2	1° 19' 11.3"	103° 06' 44.0"	2	2	9.4	1992	698
6	Supardi		2	1° 18' 58.0"	103° 06' 53.7"	2	2	9.4	1992	686
7	Sugianto		2	1° 18' 57.7"	103° 06' 44.2"	2	2	9.4	1992	650
8	Paiman		2	1° 19' 04.5"	103° 06' 53.6"	2	2	9.4	1992	656
9	Sumarno		2	1° 19' 04.0"	103° 06' 35.0"	2	2	9.4	1992	662
10	M . Jakfar		2	1° 19' 04.4"	103° 06' 44.0"	2	2	9.4	1992	704
11	Slamet		4	1° 19' 44.2"	103° 06' 48.2"	2	2	9.2	1992	945
12	Iwan		4	1° 19' 41.7"	103° 06' 55.7"	2	2	9.2	1992	913
13	Misyanto		4	1° 19' 41.7"	103° 06' 55.7"	2	2	9.2	1992	949
14	Mulyanto		4	1° 19' 38.5"	103° 06' 52.1"	2	2	9.2	1992	911
15	Sutoyo 1		4	1° 19' 32.1"	103° 06' 57.5"	2	2	9.2	1992	947
16	Aditya		4	1° 19' 49.8"	103° 06' 51.9"	2	2	9.2	1992	923
17	Suryana		4	1° 19' 40.5"	103° 06' 47.8"	2	2	9.2	1992	909
18	Juwanto		4	1° 19' 49.0"	103° 07' 01.6"	2	2	9.2	1992	876
19	Budi. P		4	1° 19' 45.6"	103° 06' 55.7"	2	2	9.2	1992	951
20	Ikhsal Hadi		4	1° 19' 50.7"	103° 06' 42.0"	2	2	9.2	1992	925
21	Slamet		14	1° 19' 29.3"	103° 06' 00.3"	2	2	9.3	1992	780
22	Mulyono		14	1° 19' 29.1"	103° 06' 08.5"	2	2	9.3	1992	768
23	Sariono		14	1° 19' 20.0"	103° 05' 57.8"	2	2	9.3	1992	748
24	Ade Chandra		14	1° 19' 16.0"	103° 06' 11.0"	2	2	9.3	1992	754
25	Sutarno		14	1° 19' 23.6"	103° 06' 04.7"	2	2	9.3	1992	760
26	Fahrul Rozi		14	1° 19' 34.1"	103° 06' 03.9"	2	2	9.3	1992	828
27	Mujiono		14	1° 19' 23.7"	103° 06' 11.4"	2	2	9.3	1992	718

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28	Rahadi		14	1° 19' 16.0"	103° 05' 55.1"	2	2	9.3	1992	744
29	Satria		15	1° 19' 46.0"	103° 06' 07.8"	2	2	9.2	1992	860
30	Rino. S		15	1° 19' 34.9"	103° 05' 56.3"	2	2	9.2	1992	832
31	Haryanto		15	1° 19' 35.2"	103° 06' 25.5"	2	2	9.2	1992	931
32	Unang Suhendi		15	1° 19' 34.7"	103° 06' 10.6"	2	2	9.2	1992	864
33	Saidun		15	1° 19' 46.1"	103° 06' 02.1"	2	2	9.2	1992	814
34	Heri Ediyanto		15	1° 19' 41.7"	103° 06' 25.7"	2	2	9.2	1992	874

## 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 Tones
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