

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

- Initial Assessment
- Annual Surveillance Assessment (1_2)
- Recertification Assessment (Choose an item.)
- Extension of Scope

<p>Client Company Name / Parent Company: PT Inti Indosawit Subur</p>
<p>Client Company / Parent Company Address: <u>Jl Palembang Kav 35 – 37, Jakarta 10230, Indonesia</u></p>
<p>Certification Unit: PT Indo Sepadan Jaya – Tanjung Selamat Palm Oil Mill Location of Certification Unit: Kampung Padang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatera Province, Indonesia</p>
<p>Date of Final Report: 19/10/2023</p>

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Section 1: Scope of the Assessment

1. Company Details			
Parent Company	PT. Inti Indosawit Subur		
RSPO Membership Number	1-0022-06-000-00	Membership Approval Date	06/02/2006
Address	Jl Palembang Kav 35 – 37, Jakarta 10230, Indonesia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	PT Indo Sepadan Jaya – Tanjung Selamat Palm Oil Mill		
Location / Address	Kampung Padang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatera Province, Indonesia		
Website	www.asianagri.com		
Management Representative	Mr. Ivan Novrizaldie	E-mail	Ivan_novrizaldie@asianagri.com
Telephone	(+62) 21 2301119	Facsimile	(+62) 21 2301120

2. Certification Information			
Certificate Number	RSPO 620704	Certificate Start Date	24/08/2021
Date of First Certification	26/05/2015	Certificate Expiry Date	23/08/2026
Scope of Certification	Production of Sustainable Crude Palm Oil (CPO) and Palm Kernel (PK)		
Visit Objectives	<ul style="list-style-type: none"> • Determination of the conformity of the client's management system, or parts of it, with audit criteria. • Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements. 		
Assessment Cycle	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 1_2) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input type="checkbox"/> Choose an item. <input checked="" type="checkbox"/> Indonesia National Interpretation 2020 for RSPO P&C 2018 for the Production of Sustainable Palm Oil		
Supply Chain Module	<input type="checkbox"/> Identity Preserved; <input checked="" type="checkbox"/> Mass Balance	Mill Capacity	60 MT/hour
ISH certification Phase	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input type="checkbox"/> Not Applicable		
Is this a remote audit or on-site audit	<input checked="" type="checkbox"/> On-site audit (Option AI)	<input type="checkbox"/> On-site audit (Option AII)	<input type="checkbox"/> Remote audit (Option B)

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
D05/65250	ISO 14001:2015	SGS Indonesia	10/06/2023
EU-ISCC-Cert- DE100-02727121	ISCC	SGS Indonesia	24/08/2023
BSI-ISPO-619189	ISPO	BSI Indonesia	21/03/2023

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Tanjung Selamat Mill	Kampung Padang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatera, Indonesia	02° 07' 39.72" N	100° 00' 08.82" E
Tanjung Selamat Estate	Kampung Padang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatera, Indonesia	02° 07' 49.49" N	100° 06' 14.71" E
Pangkatan Estate	Sennah Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatera, Indonesia	02° 11' 57.57" N	100° 00' 53.63" E

Note:

5. Description of Supply Base					
New Planting Development	<input checked="" type="checkbox"/> No (no change in total planted area)		<input type="checkbox"/> Yes (please refer to Principle 7 for details)		
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Tanjung Selamat Estate	3,858	6.57	36.75	3,901.32	98.89
Pangkatan Estate	3,667	110.91	558.09	4,336.00	84.57
Total	7,525	117.48	599.17	8,237.32	91.47

Note:

6. Plantings & Cycle						
Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Tanjung Selamat Estate	-	3,858	-	-	3,858	-
Pangkatan Estate	1,288	2,379	-	-	2,379	1,288



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Total (ha)	1,288	6,237	-	-	6,237	1,288
Note: Only Mature area is considered as production area						

7. Summary of Certified Tonnage of FFB (Own Certified Scope)				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Aug 2022 – July 2023)	Actual (Apr 2022 – Apr 2023)		Forecast (Aug 2023 – July 2024)
		Previous license period (Apr – Aug 2022)	Current license period (Sept 2022 – Apr 2023)	
Tanjung Selamat Estate	111,465	49,782.56	64,290.89	115,277
Pangkalan Estate	65,914	29,817.33	49,910.68	65,258
Total	177,379	193,801.46		180,535
Note:				

8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Aug 2022 – July 2023)	Actual (Apr 2022 – Apr 2023)		Forecast (Aug 2023 – July 2024)
		Previous license period (Apr – Aug 2022)	Current license period (Sept 2022 – Apr 2023)	
Nil		Nil	Nil	
Total				
Note: no other certified units				

9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage (MT) / year			
	Estimated last year (Aug 2022 – July 2023)	Actual (Apr 2022 – Apr 2023)		Forecast (Aug 2023 – July 2024)
		Previous license period (Apr – Aug 2022)	Current license period (Sept 2022 – Apr 2023)	
3rd Party	110,000	56,645.86	75,886.78	120,000
Total	110,000	132,532.64		120,000
Note:				

9A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	Month - Year	Volume of FFB from certified supply base (mt)	Volume of FFB from uncertified supply base (mt)	Total FFB/Month (mt)
1	April 2022	14,433.14	10,164.50	24,597.64
2	May 2022	13,973.15	9,901.38	23,874.53
3	June 2022	16,738.86	13,818.22	30,557.08
4	July 2022	16,455.96	11,989.22	28,445.18
5	August 2022	17,998.78	10,772.54	28,771.32
6	September 2022	17,540.41	8,863.72	26,404.11
7	October 2022	16,404.54	10,605.83	27,010.36
8	November 2022	15,125.56	10,678.06	25,803.62
9	December 2022	14,496.39	9,692.41	24,188.82
10	January 2023	13,208.64	9,519.63	22,728.28
11	February 2023	11,815.93	7,767.52	19,583.45
12	March 2023	13,851.32	10,807.29	24,658.61
13	April 2023	11,758.78	7,952.32	19,711.10
TOTAL		193,801.46	132,532.62	326,334.08
Note:				

10. Summary of Certified Tonnage (MT) (not applicable for ISS)			
Estimated last year (Aug 2022 – July 2023)	Actual (Apr 2022 – Apr 2023)		Forecast (Aug 2023 – July 2024)
	Previous license period (Apr – Aug 2022)	Current license period (Sept 2022 – Apr 2023)	
FFB	FFB		FFB
218,572 mt*	79,599.89 mt	114,201.57 mt	180,535 mt
	TOTAL	193,801.46 mt	
CPO (OER: 20.89 %)	CPO (OER: 20.81 %)		CPO (OER: 21.27 %)
45,661 mt*	16,696.12 mt	23,625.64 mt	38,399.80 mt
	TOTAL	40,321.76 mt	
PK (KER: 4.40 %)	PK (KER: 4.09 %)		PK (KER: 4.35 %)
9,600 mt*	3,240.54 mt	4,691.48 mt	7,853.27 mt
	TOTAL	7,932.02 mt	
Note: *including volume extension			

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10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	April 2022	3,032.31	613.58
2	May 2022	2,930.28	553.55
3	June 2022	3,439.06	668.19
4	July 2022	3,489.91	651.98
5	August 2022	3,804.56	753.25
6	September 2022	3,716.42	702.19
7	October 2022	3,442.97	664.00
8	November 2022	3,090.56	608.85
9	December 2022	2,916.96	594.55
10	January 2023	2,731.26	576.38
11	February 2023	2,457.13	503.35
12	March 2023	2,882.61	569.52
13	April 2023	2,387.73	472.64
TOTAL		40,321.76	7,932.02
Note:			

11. Summary of Actual Volume sold					
Current License period (Sept 2022 – Apr 2023)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	22,879.00	0	0	0	23,574.71
PK (MT)	4,653.51	0	0	0	4,653.51
Credits	-	-	-	-	-
Previous License period (Apr – Aug 2022)					
CPO (MT)	16,000.56	695.71	0	0	16,696.27
PK (MT)	3,122.33	0	0	0	3,122.33
Credits	-	-	-	-	-
Note:					
Conventional is RSPO certified material but sold as non-RSPO.					

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11A. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any) Apr 2022 – Apr 2023				
No.	Buyers Name	PalmTrace Trading License Number	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	PT. Sari Dumai Sejati		38,879.56	-
2	PT. Hari Sawit Jaya		-	5,130.5
3	PT. Saudara Sejati Luhur		-	1,866.4
4	PT. Supra Matra Abadi		-	778.94
TOTAL			38,879.56	7,775.84
Note:				

11B. Records of certified CPO & PK Sold under other schemes since the last audit (if any)				
No.	Buyers Name	Scheme Name	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	PT Sari Dumai Sejati	ISCC	695.71	-
TOTAL			695.71	-
Note: CPO sold as ISCC in April 2022				

11C. Records of CPO & PK Sold as conventional since the last audit (if any)				
No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)	
	Nil			
TOTAL				
Note:				

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		
TOTAL			
Note:			

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									
IS-CSPO									
IS-CSPKO									
IS-CSPKE									
CSPK									

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

Note: 1 mt = 1 credit

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

Note:

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn. Bhd. (ASI Accreditation Number: ASI-ACC-067)
 Suite 29.01 Level 29, The Gardens North Tower,
 Mid Valley City, Lingkaran Syed Putra,
 59200 Kuala Lumpur, Malaysia.
 Tel +60 (3) 9212 9638 Fax +60 (3) 9212 9639
 Representative: Dr. Chaiyaporn Seekao (Chaiyaporn.Seekao@bsigroup.com)
 Website: www.bsigroup.com

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2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on **23 – 25 May 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.

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 **11 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.

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.

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

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

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

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Recertification)	Year 2 (ASA1_1)	Year 3 (ASA1_2)	Year 4 (ASA1_3)	Year 5 (ASA1_4)
Tanjung Selamat Mill	X	X	X	X	X
Tanjung Selamat Estate	X	X	X	X	X
Pangkalan Estate	X	X	X	X	X

Tentative Date of Next Visit: May 6, 2024 - May 8, 2024

Total Number of Mandays: 9.5 mandays

2.2 BSI Assessment Team

Name	Role	Competency
Mujinius Jalaraya	Team Leader	<p>Education: Holds a Bachelor Degree majoring in Forest Resources Conservation and Ecotourism, Bogor Agricultural University (IPB).</p> <p>Work Experience: 6 years working experience in palm oil plantations as SHE Assistant at PT. Astra Agro Lestari Tbk and Sustainability Supervisor at Teladan Prima Group. 9 years working experience as RSPO Auditor/Lead Auditor.</p> <p>Training attended: Completed ISO 9001 Lead Auditor course, Endorsed RSPO P&C Lead Auditor course, Endorsed RSPO SCCS Lead Auditor course, Introductory Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation, ISO 14001 Internal Auditor Training, ISO 45001 Lead Auditor course, OHS Expert Training, SMETA Requirements Training.</p> <p>Language proficiency: Fluent in Bahasa Indonesia and English</p> <p>Aspect covered in this audit: During this assessment, he assessed on the aspects of HCV management and monitoring, Environmental management and monitoring, OHS, supply chain for mill.,</p>
Edy Widodo	Team Member	<p>Education: Holds a Bachelor Degree majoring Agricultural Technology from University of Padjadjaran, Bandung.</p> <p>Work Experience: 8 years working experience in palm oil industry as Agronomist and Assistant Manager in various companies. 9 year working experience as RSPO/ISPO auditor.</p> <p>Training attended:</p>

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		<p>Completed ISO 9001 Lead Auditor Course, ISPO endorsed auditor course, Understanding ISO 14001 training, Auditing ISO 14001: 2004 training, Endorsed RSPO Supply Chain Certification Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, SMETA Requirements Training, Introductory Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation.</p> <p>Language proficiency: Fluent in Bahasa Indonesia and English</p> <p>Aspect covered in this audit: During this assessment, he assessed on the aspects of transparency, company policy, social and labor. He also conducted public consultation with related stakeholders.</p>
Nanang Rusmana	Team Member	<p>Education: Holds a Bachelor Degree of Forestry, Bogor Agricultural University (IPB)</p> <p>Work Experience: 5 years working experience in palm oil industry as SHE Assistant at PT. Astra Agro Lestari Tbk. 3 years working experience in mining industry as Environment Coordinator and SHE Coordinator with PT. Kapuas Prima Coal Group. 6 years working experience as RSPO/ISPO Lead auditor.</p> <p>Training attended: Completed ISO 9001:2015 Lead Auditor Course, ISPO Auditor Course, ISO 14001:2015 Lead Auditor Course, ISO 45001:2018 Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, Endorsed RSPO Supply Chain Certification Lead Auditor Course, SMK3 Auditor Course, HCV Assessor Course, General OHS Expert Course, SMETA Requirements training.</p> <p>Language proficiency: Fluent in Bahasa Indonesia and English</p> <p>Aspect covered in this audit: During this assessment, he assessed on Best Management Practise for Mill and Estate, operation procedure, continuous improvement, long term business plan, time bound plan.</p>

Accompanying Persons: Nil

Name	Role
Nil	

2.3 Assessment Plan

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

Date	Time	Subjects	NR	MJ	EW
Monday, 22/05/2023	07.06 – 09.30	Flight Jakarta – Kualanamu (GA-182)	√	√	√
	09.45 – 19.00	Travel from Kualanamu to PT Indo Sepadan Jaya – Tanjung Selamat POM	√	√	√
Tuesday, 23/05/2023	08.00 – 09.00	<p>Opening Meeting</p> <ul style="list-style-type: none"> - Presentation by PT Indo Sepadan Jaya – Tanjung Selamat POM & Supply bases - Presentation by BSI Indonesia 	√	√	√
	09.00 – 12.00	Field Visit to Tanjung Selamat Estate:	√		

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		<ul style="list-style-type: none"> - Herbicide application programmes, harvesting, fertilizing operations, water management, road maintenance, terracing, etc. - Agrochemical stores, Fertilizer store, workshops, housing, landfill, clinic, HCV, riparian zones, Hazardous Waste, waste management, etc. - Boundaries inspection, worker interviews, social amenities, etc. - Interview with: Labor Union and Gender Committee. 		√		√	√
	09.00 – 15.00	Stakeholder consultation: <ul style="list-style-type: none"> - Local Government of Labuhan Batu Regency (DLH, Disbun, Disnakertrans & BPN), Village Head, surrounding community, previous land owner/user, NGO, contractor. 					√
	12.00 – 14.00	Break	√	√			√
	14.00 – 16.00	Field Visit to Tanjung Selamat POM: <ul style="list-style-type: none"> - 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. - Audit Supply Chain for CPO Mills (RSPO SCCS) - Interview workers. 	√	√			√
	16.00 – 17.00	Reporting	√	√			√
Wednesday, 24/05/2023	08.00 – 12.00	Field Visit to Pangkatan Estate: <ul style="list-style-type: none"> - Herbicide application programmes, harvesting, fertilizing operations, water management, road maintenance, terracing, etc. - Agrochemical stores, Fertilizer store, workshops, housing, landfill, clinic, HCV, riparian zones, Hazardous Waste, waste management, etc. - Boundaries inspection, worker interviews, social amenities, etc. - Interview with: Labor Union and Gender Committee. 	√		√		√
	12.00 – 14.00	Break	√	√			√
	14.00 – 16.00	Document Review Pangkalan Estate: <ul style="list-style-type: none"> - Occupational Health and Safety, HCV, Environment Aspect, time bound plan. - Social Aspect and workers welfare, worker consultation, Stakeholder consultation, impact assessments, policies. - Best Management Practice for Estate. - Operation Procedure, organization commitments, Legal compliance, continuous improvement, long term business plan. 	√	√			√

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	16.00 – 17.00	Reporting	√	√	√
Thursday, 25/05/2023	08.00 – 12.00	Document Review Tanjung Selamat POM & Tanjung Selamat Estate: - Occupational Health and Safety, HCV, Environment Aspect, time bound plan. - Social Aspect and workers welfare, worker consultation, Stakeholder consultation, impact assessments, policies. - Best Management Practice for Mill and supply chain for mill. - Operation Procedure, organization commitments, Legal compliance, continuous improvement, long term business plan.	√	√	√
	12.00 – 14.00	Break	√	√	√
	14.00 – 15.00	Audit Continue for document review Tanjung Selamat POM and Estates.	√	√	√
	15.00 – 15.30	Report Preparation	√	√	√
	15.30 – 17.00	Closing Meeting	√	√	√
	17.00 – up	Travel from PT. Indo Sepadan Jaya – Tanjung Selamat POM to Kualanamu	√	√	√
		Stay in Kualanamu	√	√	√
Friday, 26/05/2023	10.25 – 13.00	Flight Kualanamu – Jakarta (GA-185)	√	√	√

Note: MJ (Mujinius Jalaraya), NR (Nanang Rusmana), EW (Edy Widodo)

Date	Time	Subjects	MJ
Thursday, 10/08/2023	07.06 – 09.30	Flight Jakarta – Kualanamu (GA-182)	√
	09.45 – 19.00	Travel from Kualanamu to PT Indo Sepadan Jaya – Tanjung Selamat POM	√
Friday, 11/08/2023	08.00 – 08.30	Opening Meeting - Presentation by PT Indo Sepadan Jaya – Tanjung Selamat POM & Supply bases - Presentation by BSI Indonesia	√
	08.30 – 11.30	Verification NCR Close Out (Field visit, Document Review, Interview) NC# 2358185-202305-M1, Indicator 3.6.1 NC# 2358185-202305-M2, Indicator 6.2.2 NC# 2358185-202305-M3, Indicator 7.8.2	√
	11.30 – 12.00	Closing Meeting	√
	12.00 – 20.00	Traveling to Medan	√
Saturday, 12/08/2023	10.30 – 12.30	Flight Kualanamu - Jakarta	√

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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: <ul style="list-style-type: none"> - Bahilang Estate (1,019 ha) as Supply base for Tanah Datar Mill, planned in year 2024 due to still in process of RACP Concept Note still on Progress and submit to RaCP team at Q2 2023. Target to conduct audit at Q1 2024; - Topaz Estate (230 ha) as supply bases of Topaz Mill planed in 2026 due to HGU still in the process, to propose to Local Government and BPN Pusat; - Teluk Panjie Estate (801 ha) as supply bases for Teluk Panjie Mill planned in 2026 due to HGU still in process. HGU still on Progress, since the estate under 2 different province, the final approval must come from National Authority (BPN Pusat); - Sentral Estate (2,996 ha) as Supply bases for Gunung Melayu II POM planned in 2024 due to still in process of RACP (recertification 2020). Concept Note still on Progress and submit to RaCP team at Q2 2023. Target to conduct audit at Q1 2024. Revision of Timeboundplan has been approved by RSPO on 19 April 2023. The submission is according to the template as announced by the RSPO Secretariat on 21/12/2021.	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. Justification available and approved by RSPO on 19 April 2023.	Complied

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<p>Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?</p>	<p>Yes, there is time bound plan revision dated 19 April 2023. Justification available and approved by RSPO on 19 April 2023. Justification as below:</p> <ul style="list-style-type: none"> - Bahilang Estate (1,019 ha) as Supply base for Tanah Datar Mill, planned in year 2024 due to still in process of RACP Concept Note still on Progress and submit to RaCP team at Q2 2023. Target to conduct audit at Q1 2024; - Topaz Estate (230 ha) as supply bases of Topaz Mill planed in 2026 due to HGU still in the process, to propose to Local Government and BPN Pusat; - Teluk Panjie Estate (801 ha) as supply bases for Teluk Panjie Mill planned in 2026 due to HGU still in process. HGU still on Progress, since the estate under 2 different province, the final approval must come from National Authority (BPN Pusat); - Sentral Estate (2,996 ha) as Supply bases for Gunung Melayu II POM planned in 2024 due to still in process of RACP (recertification 2020). Concept Note still on Progress and submit to RaCP team at Q2 2023. Target to conduct audit at Q1 2024. <p>This has been consistent with ACOP reporting.</p>	Complied
<p>Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised</p>	No isolated lapses in implementation of the plan.	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 Major non-compliance shall be raised</p>	No any fundamental failure to justify delay in planning the assessments.	Complied
Un-Certified Units or Holdings		
<p>No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12.</p>	<p>According to internal audit result and HCV assessment for uncertified unit it was confirmed that there is no primary forest or HCV areas replace for plantation. All uncertified unit was existing plantation since 1990 and some of the plantation has been replanting.</p>	Complied
<p>Any new plantings since January 1st 2010 shall comply with the RSPO New Plantings Procedure.</p>	<p>No new planting after January 2010. RaCP for Bahilang and Sentral Estate still on going process, Concept Note still on Progress and submit to RaCP team at Q2 2023.</p>	Complied
<p>Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility,</p>	<p>According to internal audit result on December 2022, there is no land conflict occur in area of</p>	Complied

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<p>in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.</p>	<p>uncertified units: Topaz Estate, Bahilang Estate, Teluk Panjie Estate and Sentral Estate.</p> <p>According to the RSPO RaCP tracker (https://www.rspo.org/certification/remediation-and-compensation/racp-tracker) update 03 August 2023, PT Inti Indosawit Subur has:</p> <ul style="list-style-type: none"> • MU's with potential liabilities: 4 units • LUCA Submitted (MUs): 4 units • LUCA review completed (MUs): 4 units • Concept Note required (MUs): 3 units • Concept Note submitted (MUs): 2 units • Concept Note approved (MUs): 2 units • Concept Note submitted (MUs): 0 • Concept Note endorsed (MUs): 0 • Remediation Plan required (MUs): 4 units • Remediation Plan submitted (MUs): 0 • Remediation Plan approved (MUs): 0 	
<p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2</p>	<p>Internal audit has conducted for Bahilang Estate on 14 – 19 August 2023, Teluk Panji Estate on 22 – 27 May 2023, Topaz Estate on 10 – 16 May 2023 and Sentral Estate on 8 – 16 August 2023; According to internal audit result confirmed that there is no Labor disputes occur in this management unit.</p>	Complied
<p>Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1</p>	<p>Internal audit has conducted for Bahilang Estate on 14 – 19 August 2022, Teluk Panji Estate on 22 – 27 May 2023, Topaz Estate on 10 – 16 May 2023 and Sentral Estate on 8 – 16 August 2023; According to internal audit result confirmed that there is no legal non compliance occurred in this management unit.</p>	Complied
<p>Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.</p>	<p>Internal audit has conducted for Bahilang Estate on 14 – 19 August 2023, Teluk Panji Estate on 22 – 27 May 2023, Topaz Estate on 10 – 16 May 2023 and Sentral Estate on 8 – 16 August 2023. Report of internal audit are available. Result of internal audit:</p> <ul style="list-style-type: none"> - Bahilang Estate, Teluk Panji Estate and Sentral Estate has complies to relevant regulation, no issue regarding the legal compliance. - No complaint or grievances and disputes from stakeholders and affected parties. - No labor disputes occur since the latest audit. - No land conflict; Documents related to the history of land tenure and the actual legal or customary use of the land are available. 	Complied

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	- No new plantings are established on local peoples land and no HCV area replacement.	
Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?	According to internal audit result, there is no Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates.	Complied
Have there been any stakeholder (including NGO) consultation conducted?	Stakeholders consultation already conducted during internal audit for Bahilang Estate on 14 – 19 August 2022, Teluk Panji Estate on 22 – 27 May 2023, Topaz Estate on 10 – 16 May 2023 and Sentral Estate on 8 – 16 August 2023;. There is no issue from stakeholder consultation.	Complied

3.2 Progress of scheme smallholders and/or outgrowers

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

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Approved Time Bound Plan

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

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Tungkal Ulu Mill - PT Inti Indosawit Subur	Pulau Pauh / Penyabungan / Merlung Village, Tungkal Ulu District, Tanjung Jabung Regency, Jambi	Tungkal Ulu Estate	Pulau Pauh / Penyabungan / Merlung Village, Tungkal Ulu District, Tanjung Jabung Regency, Jambi	2012	Certified on 15 August 2012 Re-Certification on August 2017
		Tungkal Ulu (Plasma)	Renah Mendalo, Merlung, Muara Papalik District, Tanjung Jabung Barat Regency,	2012	Certified on 15 August 2012 Re-Certification on August 2017
Muara Bulian Mill - PT Inti Indosawit Subur	Singoan / Bukit Sari / Bulian Jaya Village, Muara Bulian / Pematang District, Batang Hari Regency, Jambi	Muara Bulian Estate	Singoan / Bukit Sari / Bulian Jaya Village, Muara Bulian / Pematang District, Batang Hari Regency,	2013	Certified on 12 July 2013 Re-Certification on August 2017
		Muara Bulian (Plasma)	Maro Sebo Ilir District, Batanghari Regency, Jambi	2013	Certified on 12 July 2013 Re-Certification on August 2017
Topaz Mill – PT Tunggal Yunus Estate	Petapahan Village, Tapung District, Kampar Regency, Riau	Topaz Estate 1	Petapahan Village, Tapung District, Kampar Regency, Riau	2015	Certified on 30 March 2015
		Topaz Estate 2	Petapahan Village, Tapung District, Kampar Regency, Riau	2026	Planned to be certified in 2026
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
Segati Mill – PT Mitra Unggul Pusaka	Langkan / Penarikan / Tambak / Sotol Village, Langgam District, Pelalawan Regency, Riau	Segati Estate	Langkan / Penarikan / Tambak / Sotol Village, Langgam District, Pelalawan Regency, Riau	2022	Certified on November 2022
		Gondai Estate	Pangkalan Sarik / Baru Village, Langgam / Siak Hulu District, Pelalawan / Kampar Regency, Riau	2022	Certified on November 2022

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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 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
		Bahilang Estate	Bahilang Village, Tebing Tinggi District, Serdang Bedagai Regency, North Sumatera	2024	*Concept Note still on Progress and submit to RaCP team at Q2 2023. Target to conduct audit at Q1 2024.
Aek Nabara Mill – PT Supra Matra Abadi	S1-S3 / Sukadame Village, Bilah Hulu / Kota Pinang District, Labuhan Batu Regency, North Sumatera	Aek Nabara Estate	S1-S3 / Sukadame Village, Bilah Hulu / Kota Pinang District, Labuhan Batu Regency, North Sumatera	2015	Certified on 6 March 2015
Teluk Panjie Mill – PT Supra Matra Abadi	Teluk Panjie Village, Kampung Rakyat District, Labuhan Batu Regency, North Sumatera	Teluk Panjie Estate (3,885 Ha)	Teluk Panjie Village, Kampung Rakyat District, Labuhan Batu Regency, North Sumatera	2015	Certified on 21 April 2015
		Teluk Panjie Estate (801 Ha)		2026	HGU still on Progress, since the estate under 2 different province, 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
		Peranap (Plasma)		2016	Certified on 18 August 2016
		Bungo Tebo Estate		2015	Certified on 3 December 2015

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Bungo Tebo Mill – PT Rigunas Agri Utama	Tuo Sumai / Sungai Rambai Village, PWK Sumai / Tebo Ulu District, Bungo Tebo Regency, Jambi	Bungo Tebo (Plasma)	Tuo Sumai / Sungai Rambai Village, PWK Sumai / Tebo Ulu District, Bungo Tebo Regency, Jambi	2017	Certified on 7 February 2017
Tanjung Selamat Mill – PT Indo Sepadan Jaya	Kampung Padang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	Tanjung Selamat	Kampung Padang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	2015	Certified on 26 May 2015
		Pangkalan	Sennah Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	2015	Certified on 26 May 2015
Gunung Melayu I – PT Saudara Sejati Luhur	Rahuning Village, Bandar Pulau District, Asahan Regency, North Sumatra	Pulau Maria Estate	Rahuning Village, Bandar Pulau District, Asahan Regency, North Sumatra	2015	Certified on 7 September 2015
Gunung Melayu II – PT Gunung Melayu	Gonting Malaha Village, Bandar Pulau District, Asahan Regency, North Sumatra	Aek Tarum & Batu Anam Estate	Gonting Malaha Village, Bandar Pulau District, Asahan Regency, North Sumatra	2015	Certified on 8 July 2015
		Sentral Estate		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"> • Certified on 23 December 2016 as Independent Mill • Audit in 2016 as Mill and Supply Base
		Aek Kuo (2,088 Ha)	Aek Korsik Village, Aek Natas District, Labuhan Batu Regency, North Sumatra	2018	Certified on 2018
		Aek Kuo		2018	

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		(501 Ha)			
Negri Lama I Mill – PT Hari Sawit Jaya	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	*3rd party which is excluded from scope of certification	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	2015	<ul style="list-style-type: none"> • Certified on 8 April 2015 • Audit in 2016 as Independent Mill

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3.3 Details of Nonconformities

The nonconformities are listed below. The findings summary of the assessment by criteria are listed in Appendix A.

During this Assessment there were 3 Critical; nonconformities raised. The PT Indo Sepadan Jaya – Tanjung Selamat Mill Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

Non-conformity			
NCR Ref #	2358185-202305-M1	Issued Date	25/05/2023
Due Date	25/08/2023	Closure Date	11/08/2023
Indicator & Category (Critical / Minor)	3.6.1 Critical		
Statement of Nonconformity:	There is no risk analysis has been carried out by company against the maintenance and construction of Mill support facilities conducted by the contractor.		
Requirement Reference:	(C) All operational activities risks assessed to identify the H&S issues. Mitigation plans and procedures are documented and implemented.		
Objective Evidence:	During field audit to Tanjung Selamat POM it was notice that there is a maintenance and construction activity conducted by contractor, however there is no risk analysis conducted by company for those activities.		
Corrections:	<ul style="list-style-type: none"> - Conducted the review and identify the risk analysis for activity of incinerator construction by contractor and updated the HIRADC document. - Socialize the HIRADC for contractor activity of (incinerator construction). 		
Root Cause Analysis:	OHS expert were miss to review and adjustment the latest risk analysis related to contractor work at Tanjung Selamat POM.		
Corrective Actions:	Conduct regular review and monitoring the new activity in Mill and Estate particularly for contractor activity.		
Assessment Conclusion:	<ul style="list-style-type: none"> - PT Indo Sepadan Jaya – Tanjung Selamat POM has identified the activity of contractor covering construction of incinerator. Risk analysis and risk control or mitigation has been determined. HIRADC has been review and updated on 7 July 2023 through safety committee meeting. Evidence of HIRADC document and review are available during audit. - PT Indo Sepadan Jaya – Tanjung Selamat POM has conducted the socialization to the contractor and it workers related to HIRADC for incinerator construction. Socialization conducted through master morning by Field Assistant and Mill manager. During interview with contractor supervisor PT Ayam Mas (Ardiansyah) and its workers on 11 August 2023, confirmed that they have aware related to the risk of their activity and how to mitigate the risk, such as PPE usage during working and implementing safe working practices to prevent the incident/accident. - Monitoring and review for HIRADC and its implementation will be conducted through safety committee meeting. Latest meeting conducted on 7 July 2023. 		

	<p>Safety committee meeting will be conducted monthly and reported each quarter on P2K3 report to Manpower Office of North Sumatera Province.</p> <p>Based on above verification, the CAP has effectively implemented and the NC has been Closed satisfactory.</p>
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Non-conformity			
NCR Ref #	2358185-202305-M2	Issued Date	25/05/2023
Due Date	25/08/2023	Closure Date	11/08/2023
Indicator & Category (Critical / Minor)	6.2.2 Critical		
Statement of Nonconformity:	During audit, it was found the workers were doing work without a work contract with the company.		
Requirement Reference:	(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed.		
Objective Evidence:	Based on interviews result with employees at Tanjung Selamat Estate in harvesting activity at Block A17k Afd I with a sample of employees (Initial IN, JN, RI) and B15i-Afd II with a sample of employees (Initial FM), it was found that there were workers who assisted in harvesting activities (taking loose fruit) who were not registered as workers and did not have work contracts with the company.		
Corrections:	<ul style="list-style-type: none"> - Conduct socialization to harvesters regarding the prohibition on bringing workers without work contracts involving representatives of the Estate Dept, HR Department, Safety Team and Company Doctors so that harvesters understand the risk/impacts and consequences if a work accident occurs to the non-workers brought. - Conduct socialization to housewives (Wives) regarding the prohibition on being in the work area for non-workers not to be in the work area during working hours, usually the wives are often willing to help so that they know the strict sanctions that will be given if they violate it. 		
Root Cause Analysis:	<p>Lack of awareness and understanding from harvesters and non-workers (relatives/wives) regarding the risk of work safety for non-contract workers or non-workers,</p> <p>As well as minimal knowledge and understanding and firm action towards supervision regarding the company policy which prohibits the use of voluntary harvest helpers from non-workers, due to the absence of special inspections from supervision so that non-workers still secretly carry out these actions to increase harvest income.</p>		
Corrective Actions:	<ul style="list-style-type: none"> - Supervision carries out monitoring and supervision to ensure that there are no harvest work assistants in the field who help the harvesters' work without a work contract. - Issued a policy (Memo) of strict sanctions for harvest workers caught bringing non-workers from management regarding the prohibition on bringing workers without a work contract. 		

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Assessment Conclusion:	<ul style="list-style-type: none"> - PT Indo Sepadan Jaya has conducted socialization to harvesters regarding the prohibition on bringing workers without work contracts, socialization conducted on 8 June 2023 in Kebun Pangkatan – Rantau Sinar Karsa and Tanjung Selamat Estate. Socialization also conducted to housewives (Wives) regarding the prohibition on being in the work area for non-workers not to be in the work area during working hours. During interview with sampled workers and their wives confirmed that they have understanding that non workers are prohibited to conduct working/helping the harvester in the field to picked up loose fruit/frond stacking. Company only allowed the assign workers to help the harvester during peak season for picked up loose fruit. - PT Indo Sepadan Jaya has issued the memorandum of strict sanctions for harvest workers caught bringing non-workers from management regarding the prohibition on bringing workers without a work contract. The memorandum has socialize to the harvester and non workers on 8 June 2023. - PT Indo Sepadan Jaya has conduct the monitoring to ensure that there is no harvest work assistants in the field who help the harvesters' work without a work contract. Monitoring conducted by field supervisor before working and during working. Monitoring evidence was sighted in "Monitoring Pekerjaan Panen". Monitoring reported to Field Assistant and Estate manager. According to monitoring result August 2023, there is no helper or non workers who conduct working/helping harvester in the field. <p>Based on above verification, the CAP has effectively implemented and the NC has been Closed satisfactory.</p>
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Non-conformity			
NCR Ref #	2358185-202305-M3	Issued Date	25/05/2023
Due Date	25/08/2023	Closure Date	11/08/2023
Indicator & Category (Critical / Minor)	7.8.2 Critical		
Statement of Nonconformity:	Company has not implementing the water courses protection according to procedure and management plan.		
Requirement Reference:	(C) Water courses and wetlands are protected, including the maintenance and restoration of riparian zones and other buffer zones during or before replanting, in accordance with the "RSPO Manual on BMPs for the management and rehabilitation of riparian reserves" (April 2017) or Simplified Guide Management and Rehabilitation of Riparian Reserves (2018).		
Objective Evidence:	During a field visit to the Tanjung Selamat POM, it was found that there was leachate from the boiler ashes which flowed into the natural ditch and did not flow into the waste pond.		
Corrections:	Develop a permanent leachate flow barrier around the boiler ash pile leading to the waste ditch and waste pond.		
Root Cause Analysis:	There is no barrier to the flow of leachate around the boiler ash pile.		
Corrective Actions:	Monitoring the condition of liquid waste disposal ditches at each shift change.		

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Assessment Conclusion:	<p>Tanjung Selamat POM has made the leachate flow barrier around the boiler ash pile. During field visit to Tanjung Selamat Mill it was found that there is no more leachate from the boiler ashes which flowed into the natural ditch. The leachate from boiler ash was flow in to the waste ditch and waste pond. Natural ditch condition currently no leachate from boiler ashes.</p> <p>Tanjung Selamat POM also has conducted daily monitoring by field assistant to ensure that there is no leachate of boiler ash in to the natural ditch and ensuring that the permanent leachate flow barrier are well maintained.</p> <p>Based on above verification, the CAP has effectively implemented and the NC has been Closed satisfactory.</p>
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Opportunity for Improvements	
OFI #	Description
OFI 1	Nil

Positive Findings	
PF #	Description
PF 1	Nil

3.3.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	2190654-202204-M1	Issued Date	21/04/2022
Due Date	20/07/2022	Closure Date	18/06/2022
Indicator & Category (Critical / Minor)	RSPO P&C INA NI 2020 – Indicator 2.1.3 (Critical) - (minor escalated to major)		
Statement of Nonconformity:	There is inconsistency in carrying out the maintenance and monitoring of HGU pole or there is not clearly demarcated in the Pangkatan Estate and Tanjung Selamat Estate.		
Requirement Reference:	Legal or authorized boundaries are clearly demarcated and visibly maintained and there is no planting beyond these legal or authorized boundaries.		
Objective Evidence:	<p>Tanjung Selamat Estate:</p> <ol style="list-style-type: none"> During field visit at Tanjung Selamat Estate, on block B15A it is cannot be found HGU pole's no. 27 in accordance with the point on the HGU pole's map, although in the last maintaining and monitoring of poles on 12 January 2022 was stated and in good condition. During field visit to the location of Area Usaha Baru (area 123.915 Ha) there were 68 HGU stakes that had not been installed. Based on the HGU pole's map, 		

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	<p>there are 86 poles, but only 18 poles have been installed. And also Tanjung Selamat Estate can not show that the maintenance of HGU pole has been carried out consistently.</p> <p>Furthermore, during field visit at Area Usaha Baru location, there is no HGU pole's was installed of area 123.915 ha. Tanjung Selamat Estate has identified based on the HGU map, that there are 86 poles and at the time of the field visit there was only 1 pole, namely no. 77.</p> <p>Pangkatan Estate:</p> <p>During field visit to on Block A6, can not found the pole No. LI (51), although on the monitoring and maintenance of HGU Pole's on 21 December 2021 had checked in good conditions.</p>
Corrections:	Reidentify unmounted poles, and reinstall the unmounted poles, and document them.
Root Cause Analysis:	<p>There has not been a special officer to monitor HGU pegs.</p> <p>The granting of an HGU permit for the new order at Tanjung Selamat Estate area is still being carried out, so the process of installing the HGU pegs is still in the on progress stage.</p>
Corrective Actions:	PIC conducts routine monitoring every 3 months, and the PIC reports it to the Estate Manager.
Assessment Conclusion:	<p>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 Critical/Major NC.</p> <p>Critical/Major NC closed.</p>
Effectiveness Closure (for previous audit closed Critical NC):	During this audit, company was consistently implementing the monitoring of HGU poles each 3 month. Evidence of monitoring during audit can be shown. Report on inspection and maintenance of HGU boundary markers for the January 2023 period was available during audit, in which all stakes have been monitored and checked in the field. The NC remain Closed.

Non-conformity			
NCR Ref #	2190654-202204-M2	Issued Date	21/04/2022
Due Date	20/07/2022	Closure Date	18/06/2022
Indicator & Category (Critical / Minor)	RSPO P&C INA NI 2020 – Indicator 7.3.1 (Critical) - (minor escalated to major)		
Statement of Nonconformity:	A waste management plan is not implemented in accordance with applicable laws and regulations.		
Requirement Reference:	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.		
Objective Evidence:	During field visit to WWTP it was found that flowmeter for wastewater both in and outlet were not functioning and the wastewater still discharge to the river. In addition, according to the information from Mill Assistant it has not function since 3 weeks ago.		

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	PT ISJ has obtained permit for Wastewater Discharge to River/water body according to the Decree Letter from Kepala Dinas Penanaman Modal dan Pelayanan Terpadu Satu Pintu Labuhan Batu No. 503/660.31/397/DPM-PTSPBP2MMP/2018 tanggal 21 September 2019. Decree stipulated among others "Memasang Alat Ukur Debit / Install Flowmeter in the Outlet".
Corrections:	Make a memorandum containing the appointment of a PIC for checking the condition and the presence of the WWTP flowmeter.
Root Cause Analysis:	There is no monitoring related to the presence of the flowmeter, either its condition and or its presence in the field.
Corrective Actions:	Installing the WWTP inlet flowmeter and repairing the damaged WWTP outlet flowmeter. Adding a spare flowmeter referring to regulation from Kementerian Lingkungan Hidup RI.
Assessment Conclusion:	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 Critical/Major NC.
Effectiveness Closure (for previous audit closed Critical NC):	During this audit, it was noted that the flowmeter for inlet and outlet of waste water was well maintained and properly function. Monitoring of flowmeter was conducted regularly by PIC of waste pond. PIC records daily liquid waste flow and reports it to the field assistant and mill manager. If there is damage to the flowmeter, the PIC will immediately report it and the field assistant and mill manager will follow up immediately.

Non-conformity			
NCR Ref #	2190654-202204-N1	Issued Date	21/04/2022
Due Date	Next ASA1.2	Closure Date	25/05/2023
Indicator & Category (Critical / Minor)	RSPO P&C INA NI 2020 – Indicator 2.3.2 (minor)		
Statement of Nonconformity:	The evidence as listed in indicator 2.3.1 namely proof of land ownership for indirectly sourced FFB cannot be shown during audit.		
Requirement Reference:	For all indirectly sourced FFB, the unit of certification obtains from the collection centers, agents or other intermediaries, the evidence as listed in indicator 2.3.1.		
Objective Evidence:	Based on the document review, it is known that there are 4 (four) indirect FFB suppliers for Tanjung Selamat POM, namely: Roma, Wan Juma Sari Dewi-dura, Wanjuma Sari Dewi-KS, and Rizky Fazar Adi Putra. The company already has data of Information regarding the geolocation of FFB origins, and valid planting/operational/trading license, however for proof of land ownership from the indirect supplier has not been able to show during audit.		
Corrections:	Provide socialization and explanation to the Indirect supplier related to the update of RSPO PC 2018 related the need for legality documents and coordinate points for Direct and Indirect of FFB suppliers.		

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Root Cause Analysis:	Data collection on legality and supplier coordinates, both direct and indirect, is carried out in stages. Most of the indirect farmers do not want to provide legality document because they are afraid that the company will use the legality documents incorrectly.
Corrective Actions:	Approaching indirect farmers to be able to provide a copy of the legality of the land owned by the farmer.
Assessment Conclusion:	The effectiveness of the CAP will be verified in the next surveillance audit.
Effectiveness Closure (for previous audit closed Critical NC):	<p>Tanjung Selamat POM has conducted socialization and explanation to the Indirect supplier to provide legality document.</p> <p>The correct indirect of FFB suppliers are CV Palta Jaya, Wan Juma Sari Dewi (WJD) and Wan Juma Sari Dewi-KS.</p> <p>Verified sample for Wan Juma Sari Dewi:</p> <ul style="list-style-type: none"> - Masrokan, with area 0.6 Ha; geolocation E 100° 5' 29.91" N 2° 7' 20.52"; land status SKT (Surat Keterangan Tanah) No. 593/267/PEM/2005 dated 30/08/2005. - Yetti Sukmawati, with area 1.5 Ha; geolocation E 100° 4' 8.05" N 2° 5' 1.40"; land status SKGR (Surat Keterangan Ganti Rugi) No. 592.2/1138/PEM/2009 dated 11/11/2009. <p>The NC was Closed satisfactory on 25/05/2023.</p>

Non-conformity			
NCR Ref #	2190654-202204-N2	Issued Date	21/04/2022
Due Date	Next ASA1.2	Closure Date	25/05/2023
Indicator & Category (Critical / Minor)	RSPO P&C INA NI 2020 – Indicator 6.7.2 (minor)		
Statement of Nonconformity:	The implementation of emergency procedures at the Tanjung Selamat POM is not consistently applied.		
Requirement Reference:	Accident and emergency procedures in Indonesian language are in place and clearly understood by all workers. Assigned operatives trained in first aid are present in both field and other operations. First aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.		
Objective Evidence:	Tanjung Selamat POM has a procedure for Emergency Procedure and Emergency equipment. However, during field visit and test the hydrant it was found that there was a leakage from the hydrant installation, no action taken by the unit to repair the installation.		
Corrections:	<p>Create a training program for employee which is carried out once in 3 months to ensure the hydrant is in good condition.</p> <p>Create a signboard indicating that there is a hydrant pipe, so that the Truck Driver who enter the mill do not cross the hydrant pipe line.</p>		
Root Cause Analysis:	<p>Checking the hydrant hose is not routinely carried out by the staff in charge.</p> <p>The hose has not been used for a long time and standby in the hydrant box.</p>		

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	The hydrant pipe is right under the path of the CPO transporting vehicle,. So the pressure from the vehicle make the hydrant pipe broken.
Corrective Actions:	<ol style="list-style-type: none"> 1. Perform routine checks once a month on the condition of the hydrant hose by the unit's OHS Officer. 2. Replace the leaking hydrant hose with a new one. 1. Changing the path of the CPO transport truck, so that it does not pass right over the hydrant pipe.
Assessment Conclusion:	The effectiveness of the CAP will be verified in the next surveillance audit.
Effectiveness Closure (for previous audit closed Critical NC):	<ul style="list-style-type: none"> - Tanjung Selamat POM has conducted monthly checking of the hydrant equipment including hose function, nozzle function, hydrant water flow. Evidence of hydrant checking can be shown during audit, latest monitoring on May 2023. During field visit to Tanjung Selamat POM, hydrant test shown that hydrant installation is in proper condition and works good. No leaking of the hose and hydrant installation. - Hydrant installation under the path of the CPO transporting vehicle has been moved to the top of the factory. <p>The NC was Closed satisfactory on 25/05/2023.</p>

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

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1128962M1	Major	3.1.1	08/12/2014	Closed on 23 March 2015
1128962M2	Major	4.7.2	08/12/2014	Closed on 23 March 2015
1128962M3	Major	6.3.1	08/12/2014	Closed on 23 March 2015
1128962N1	Minor	4.8.2	31/03/2016	Closed on 16 May 2017
1128962N2	Minor	4.7.6	31/03/2016	Closed on 16 May 2017
1128962N3	Minor	2.2.2	31/03/2016	Closed on 16 May 2017
1479188-201705-N1	Minor	6.1.4	18/05/2017	Escalated to Major NC
1600992-201802-M1	Major	1.1.2	28/02/2018	Closed on 6 April 2018
1600992-201802-M2	Major	4.6.11	28/02/2018	Closed on 6 April 2018
1600992-201802-M3	Major	4.7.2	28/02/2018	Closed on 6 April 2018

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1600992-201802-M4	Major	4.7.4	28/02/2018	Closed on 6 April 2018
1600992-201802-M5	Major	4.7.5	28/02/2018	Closed on 6 April 2018
1600992-201802-M6	Major	6.1.4	28/02/2018	Closed on 6 April 2018
1600992-201802-M7	Major	SCC 5.7.2	28/02/2018	Closed on 6 April 2018
1600992-201802-N1	Minor	2.1.3	28/02/2018	Closed on 29 March 2019
1600992-201802-N2	Minor	4.7.7	28/02/2018	Closed on 29 March 2019
1600992-201802-N3	Minor	5.1.3	28/02/2018	Closed on 29 March 2019
756144-201903-M1	Major	5.3.2	29/03/2019	Closed on 18 June 2019
756144-201903-M2	Major	5.6.2	29/03/2019	Closed on 18 June 2019
1921605-202006-M1	Critical	2.3.1	11/06/2020	Closed on 6 August 2020
1921605-202006-M2	Critical	4.1.1	11/06/2020	Closed on 6 August 2020
1921605-202006-M3	Critical	6.6.2	11/06/2020	Closed on 6 August 2020
1921605-202006-N1	Minor	7.1.2	11/06/2020	Closed on 26 February 2021
2049985-202101-M1	Critical	3.6.2	27/02/2021	Closed on 5 May 2021
2049985-202101-N1	Minor	7.3.1	27/02/2021	Escalated to Major NC
2049985-202101-N2	Minor	6.2.7	27/02/2021	Closed on 20 April 2022
2049985-202101-N3	Minor	2.1.3	27/02/2021	Escalated to Major NC
2190654-202204-M1	Critical	2.1.3	21/04/2022	Closed on 18 June 2022
2190654-202204-M2	Critical	7.3.1	21/04/2022	Closed on 18 June 2022
2190654-202204-N1	Minor	2.3.2	21/04/2022	Closed on 25/05/2023
2190654-202204-N2	Minor	6.7.2	21/04/2022	Closed on 25/05/2023
2358185-202305-M1	Critical	3.6.1	25/05/2023	Closed on 11/08/2023
2358185-202305-M1	Critical	6.2.2	25/05/2023	Closed on 11/08/2023
2358185-202305-M1	Critical	7.8.2	25/05/2023	Closed on 11/08/2023

3.4 Stakeholders and previous land owner / user consultation

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss PT Indo Sepadan Jaya – Tanjung Selamat Mill Certification Unit's environmental and social performance, legal and any known dispute issues.

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

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of

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workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as below.

Stakeholders contacted		
Type of Stakeholder (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	Stakeholder name / organization	Means of communication (e.g. face to face interview, email, phone interview, comment from public notice)
Governmental Department	Dinas Pertanian dan Perkebunan Kabupaten Labuhanbatu – Mr. Yayan	By phone
Governmental Department	Dinas Lingkungan Hidup Kabupaten Labuhanbatu – Mr. Rais	By phone
Governmental Department	Dinas Tenaga Kerja dan Transmigrasi Kabupaten Labuhanbatu – Mr. Manik	By phone
Communities	Head of Gender Committee of PT ISJ – Mrs. Romasi Banjarnahor	Face to face interview
Communities	Head of Sennah Village – Mr. Amin	Face to face interview
Communities	Head of Kampung Padang Village - Mr. Jarno	Face to face interview
NGO	LSM Laskar Merah Putih Kabupaten Labuhanbatu	By Phone
Union	SPSI PT Indo Sepadan Jaya	Face to face interview
Union	SPSI PT Rantau Sinar Karsa	Face to face interview
Internal	Workers sampled	Face to face interview

Stakeholders comment	
1	<p>Feedbacks: Dinas Pertanian dan Perkebunan Kabupaten Labuhanbatu – Mr. Yayan</p> <ul style="list-style-type: none"> • Company and “Labuhanbatu District Plantation Office” has been going well. • PT Rantau Sinar Karsa and PT Indo Sepadan Jaya has obtained a “Plantation Business Permit (IUP)”. • PT Indo Sepadan Jaya has obtained a “Plantation Class III Assessment” (Medium). Meanwhile, PT Rantau Sinar Karsa received a plantation grade assessment; class II (Good). • Suggestion related to the obligation to develop community plantation (cooperation) of 20% for Rank Estate (PT RSK) and Tanjung Selamat Estate (PT ISJ). • Companies (PT ISJ) already have programs for empowering local communities through the CSV (Create Share Value) program. • No complaints were reported and/or recorded by the “Plantation Office of North Sumatra Province” related to mill and plantation operations. <p>Audit Team verification and response: - Management acknowledges positive feedback/ comments and is deemed compliant</p>

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	<ul style="list-style-type: none"> - PT ISJ has collaborated with Tanjung Selamat Village to provide guidance for independent oil palm smallholders for a land area of 941.53 Ha. This collaboration was established based on the Cooperation Agreement between PT Indo Sepadan Jaya and Bumdes Tebing Tinggi Pangkatan Sejahtera No. 01/CSV-KTS/X/2019 dated 24 October 2019. Through this collaboration, the future PT ISJ will evaluate the Bumdes Tebing Tinggi Pangkatan Sejahtera which will later be continued to enter into a partnership agreement for the management of oil palm plantations in Tanjung Selamat Village. - PT. Indo Sepadan Jaya (ISJ) signed a memorandum of understanding in partnership with the Sumber Rejeki Farmers Group Association (Gapoktan) at the Tanjung Selamat Factory Office, Kampung Padang Village, Pangkatan, Labuhanbatu, Medan on 30 September 2016. The form of cooperation included counselling on cultivation techniques good palm oil, starting from the selection of superior seeds, planting, maintenance, to harvesting, even guaranteeing the purchase of Gapoktan's palm fruit bunches (FFB) by the company - Asian Agri's partnership program with independent smallholders has been running since 2012 and continues to be ongoing. - PT Indo Sepadan Jaya (ISJ) and PT RSK have a CSV (Create Share Value) program which is an oil palm partnership with the surrounding community, a CSV program for the period 2022-2023, while PT RSK does not have a CSV collaboration program. - In 2022 the company has compiled 6 types of programs, including programs to improve the welfare of the surrounding community. - The development of this collaboration will always be monitored in the next audit.
<p>2.</p>	<p>Feedbacks: Dinas Lingkungan Hidup Kabupaten Labuhanbatu – Mr. Rais</p> <ul style="list-style-type: none"> • In general, communication between the company and the "Labuhanbatu District Environmental Service" has been going well. • Company has obtained "Environmental Permits" for all oil palm plantation areas and palm oil mills. • Company has a permit for the temporary storage of hazardous waste (TPS LB3). • The company has prepared a "RKL-RPL Implementation Report", "B3-hazardous waste report" and is reported regularly (six months) to the "Labuhanbatu Regency Environmental Service". PT Indo Sepadan Jaya (ISJ) and PT Rantau Sinar Karsa (RSK) have consistently submitted the RKL-RPL Implementation Report every 6 months (last report from Semester II 2022). • The company has carried out proper river border management. • Several areas of Pangkatan's plantations are peat areas. PT RSK has implemented water management on peatlands well. • During the period 2022-2023 there were no reports from the surrounding community related to environmental issues (pollution). <p>Audit Team verification and response:</p> <ul style="list-style-type: none"> • It is a positive response and there is no need for a response • PT RSK has hazardous temporary storage permit renewal/extend based on the Decree of the Head of the Office of Investment and One Stop Services of Labuhan Batu Regency Number: 503.660.3/557/DPMPTSP-BP2MNP/2019 dated November 5, 2019 concerning the Granting of a B3 Waste Management Permit for Hazardous Waste Storage Activities To PT Rantau Sinar Karsa. The permit is valid for 5 years from the date of issue. Hazardous waste storage is permitted in a predetermined place and the storage period is 90 days if the volume of waste generated reaches 50 kg/day and storage can be carried out up to 180 days if the waste generated is less than 50 kg per day. • PT ISJ has hazardous temporary storage based on Decree of the Regent of Labuhan Batu Number 503.660/324/BLH-LB/WAS/2014 dated December 30, 2014. concerning Permit for Temporary Storage of

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	<p>Hazardous and Toxic Waste to PT. Indo Sepadan Jaya – Tanjung Selamat Estate, Kampung Padang Village, Pangkatan District, Labuhan Batu Regency. The permit is valid for 5 years from the date of issue.</p> <ul style="list-style-type: none"> • In addition to determining the boundaries of water sources, rehabilitation or restoration is also carried out on the border areas of water sources that need to be rehabilitated/restored. In the river border area, riparian boundary markers are installed with red cast paralon pegs with a distance of 200 m between stakes. • The company has established a groundwater management program (Water level) to ensure peat subsidence can be monitored and minimized. The company has built and monitored sluice gates, main ditch gates, peat subsidence monitoring, water level monitoring. <p>The company has implemented water management and peat subsidence monitoring programs, among others in the following ways:</p> <ol style="list-style-type: none"> 1. Monitoring the water level, using a water level gauge. 2. Monitoring peat subsidence, using subsidence stakes. 3. Monitoring the groundwater level, using a piezometer. <ul style="list-style-type: none"> • Based on visits to river borders and forest tree nurseries for the purposes of planting the right and left sides of the river borders, it shows that the company has commitment and efforts to improve the river borders in their HGU. • Implementation of peat ecosystem restoration program, will be verified at every audit visit
<p>3.</p>	<p>Feedbacks: Dinas Tenaga Kerja dan Transmigrasi Kabupaten Labuhanbatu – Mr. Manik</p> <ul style="list-style-type: none"> • T. Indo Sepadan Jaya (PT ISJ) and PT Rantau Sinar Karsa (PT RSK) have established good communication with the "Office of Manpower and Transmigration of Labuhan Batu Regency". • PT. Indo Sepadan Jaya (PT ISJ) and PT Rantau Sinar Karsa (PT RSK) have prepared and reported on their industrial relations obligations such as the "Mandatory Labor Report" and "P2K3 Report" for health and safety performance. • There is no indication/report on the use of underage workers (Child labour) at PT. Indo Sepadan Jaya and PT Rantau Sinar Karsa. • The application of wages for the period of 2023 is uses the basis of wages based on the Decree of the Governor of North Sumatra No. 188.44/1004/KPTS/2023 dated 7 December 2022 regarding the Sectoral Minimum Wage of Labuhan Batu Regency in 2023 of IDR 3,284,500 per month. • All employees have been registered with the social insurance "BPJS Ketenagakerjaan and BPJS Kesehatan". • The company has a collective labor agreement (PKB: <i>Perjanjian Kerja Bersama</i>) for the period 2018-2020. The renewal of PKB or working agreement for 2022 – 2024 are still under process of approval and registration to Ministry of Manpower. According the provisions in the PKB it is stated that if the new PKB is not yet available, the old PKB is still valid to be used as a reference. • The company has prepared personal protective equipment, based on risk assessment and accident records. • In the period 2022-2023 there were no cases of industrial relations or employment cases. • Regarding Harvester-PHL workers, the company has committed to carry out promotions in stages for harvesters who have entered from the period before 2022, while for workers who entered the 2023 period, recruitment will be carried out with a permanent worker recruitment program with a 3-month trial (Probations) period as an evaluation. <p>Audit Team verification and response:</p>

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	<ul style="list-style-type: none"> • PT. Indo Sepadan Jaya and PT Rantau Sinar Karsa acknowledge the positive feedback and consider the comments constructive. • Collective Labor Agreement (PKB) between the Cooperation Agency for Sumatran Plantation Companies (BKS-PPS) and <i>Pengurus Pusat Federasi Serikat Pekerja Pertanian dan Perkebunan Serikat Pekerja Seluruh Indonesia</i> (PP.FSP.PP-SPSI) which have been registered with the Ministry of Manpower in accordance with the Decree <i>Dirjen Pembinaan Hubungan Industrial dan Jaminan Sosial Tenaga Kerja</i> No. KEEP. 88/PHIJSK-PKKAD/PKB/VI/2015, dated 4 July 2018, effective from 8 April 2018 to 20 April 2020, outlining the Rights and Obligations of Workers with SKU status (General Work Terms). The renewal of PKB or working agreement for 2022 – 2024 are still under process of approval and registration to Ministry of Manpower. According the provisions in the PKB it is stated that if the new PKB is not yet available, the old PKB is still valid to be used as a reference. • Regarding the PHL harvesters, the auditor team will verify the recruitment program for PHL harvesters and will also verify the harvester evaluation process during a 3-month probation period.
4.	<p>Feedbacks: Head of Sennah Village – Mr. Amin Head of Kampung Padang Village - Mr. Jarno</p> <ul style="list-style-type: none"> • Communication between village officials and the company went well. • Every year the company always has a CSR Program for the surrounding community. • During 2021-2022 there were no reports of land disputes between the community and the company either at PT ISJ or at PT RSK. Although there are land problems in Pangkatan Estate (PT RSK) which have occurred since 2019. • There are no issues from the surrounding community related to social and environmental issues. • Absorption of local workers to work at PT Indo Sepadan Jaya and PT Rantau Sinar Karsa is minimal, including at the casual service level, although job vacancies at PT Indo Sepadan Jaya and PT Rantau Sinar Karsa are always announced, which are handed over to village officials around Kampung Padang Village, Desa Sennah, Kampung Padang Village, etc. However, the company should always provide information related to the opening of the workforce. • So far, communication between the village and the company has been running smoothly and stated that there has been a CSR program. • That HGU No. 3/Sennah whose rights will expire on December 31, 2020 based on the Decree of the Head of the National Land Agency No. 125 HGU/BPN/2004 dated October 28, 2004 regarding the granting of an extension of the term and renewal of HGU on land located in Kab. Labuhanbatu and has been registered for the extension of the HGU period ending on December 31, 2045 on a land area of 4,336 Ha as described in the measuring letter dated January 5, 1993 No. 151/1993. From this, there is a problem with the demands of 4 (four) farmer groups: Farmers and Fishermen Group, KT Bomban Seberang Seberang, KT Makmur Parduaan, and KT Dusun V, VI, VII for the land with an area of approximately 2,062.16 Ha which is located on the river border. Merbau Afdeling II. • Complaints from Senah Village, independent oil palm farmers, related to permission to cross the PT SSR plantation area to transport FFB crops. Through Public Relations PT ISJ and RSK had a meeting with community leaders of Senah Village and the Head of Senah Village regarding the permit to enter PT RSK's plantation area by issuing a "Surat Perjanjian Perawatan Jalan Parimeter" containing an agreement. <p>Audit Team verification and response:</p> <ul style="list-style-type: none"> • Communication with village officials around the plantation is well established through the Public Relations and Estate Manager.

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	<ul style="list-style-type: none"> • Realization of CSR program for 2022-2023 period which has been implemented. PT ISJ and PT RSK have also prepared a Social Responsibility / CSR Program in the Asian Agri Plantation I CSR Program in North Sumatra for the 2023 period. • Regarding land issues in The Pangkatan Estate (PT RSK): At the time this surveillance audit was carried out and based on information as of 20 June 2022 that the land conflict issue still had no common ground between the two parties, so based on interviews with the Head of Sennah Village and Management of PT RSK, that the land in question was idle land and also outside HGU. Based on field monitoring, members of the Bilah Hilir Police were also present at the location of the land the residents wanted to own, accompanied by the Executor, (PJ) Head of Sennah Village, Amin Awaluddin. However, based on information from the Plantation Manager PT. RSK Rizal said that the land was a plantation forest conversion land and those who know more about this are the BPN Office of Labuhan Batu Regency. Regarding land issues in The Pangkatan Estate (PT RSK), has been explained in the explanation of indicator 4.8.1 in this report. • Complaints from Senah Village, independent oil palm farmers, related to permission to cross the PT SSR plantation area to transport FFB crops. Through Public Relations PT ISJ and RSK had a meeting with community leaders of Senah Village and the Head of Senah Village regarding the permit to enter PT RSK's plantation area by issuing a "Surat Perjanjian Perawatan Jalan Perimeter" containing an agreement, that: <ul style="list-style-type: none"> - Maximum community FFB loading capacity of 5 tons. - Exit time limit from POS I (security) max. 18.00 WIB and additional time if community harvest conditions improve until 19.00 WIB - If the FFB load exceeds 5 tons, a penalty will be imposed and no longer allowed to cross the road (PT RSK area) to transport community FFB - The community is required to bring stones to petrun and file them in a designated place (in PT RSK's area). - PT RSK will assist with road repairs through the procurement of heavy equipment. <p>Through this agreement, the community can use this road to transport (independent oil palm farmers) their FFB harvests.</p>
<p>5.</p>	<p>Feedbacks:</p> <p>Head of Gender Committee of PT ISJ – Mrs. Romasi Banjarnahor Labor Union Head PT RSK: Sdr. Henri G. Sinaga Labor Union Head PT ISJ: Josmar Tamba</p> <ul style="list-style-type: none"> • Communication is established with the company's management through regular meetings held at least 2 times a year. • The application of wages is in accordance with applicable regulations. Wages have been implemented in accordance with the North Sumatra governor's stipulation for the 2023 period, in March 2023 a wage rate plan for the period January - March 2023 has been carried out. • Provision of work equipment is provided at no cost to employees, including the provision of PPE (personal protective equipment). • Housing facilities are provided including electricity and clean water for workers. The company has also budgeted funds for the maintenance and repair of employee housing and public facilities. • Health insurance is provided to employees through clinics established by the company in the plantation area. • Up to now, there is no issue of the use of child labor (under the age of 18), there is no coercive work.

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	<ul style="list-style-type: none"> • Regarding Harvester-PHL workers, the company has committed to carry out promotions in stages for harvesters who have entered from the period before 2022, while for workers who entered the 2023 period, recruitment will be carried out with a permanent worker recruitment program with a 3-month trial (Probations) period as an evaluation. • The company and trade unions will make every effort to resolve industrial relations cases internally. • Until this year there is no issue related to sexual harassment. • Workers are understand the type of sexual harassment and they will report any case of sexual harassment. • Company provide the child care and nursery for new mother and give the time for breastfeeding mother. <p>Audit Team verification and response:</p> <ul style="list-style-type: none"> • Is a positive response and will be maintained and developed for the better. • The company has policies related to wages, use of labor and ensuring the rights of its employees. • The Company has a Policy signed by Management on May 1, 2009 which states; minimum age limit of 18 years for employee recruitment and prohibits children from working in any company activities. • The application of wages for the period of 2023 is uses the basis of wages based on the Decree of the Governor of North Sumatra No. 188.44/1004/KPTS/2023 dated 7 December 2022 regarding the Sectoral Minimum Wage of Labuhan Batu Regency in 2023 of IDR 3,284,500 per month. • The implementation of company policies has been well implemented. • The implementation of policies related to employment (wages, use of child labor and recognition of labor rights) must always be monitored. • Regarding the PHL harvesters, the auditor team will verify the recruitment program for PHL harvesters and will also verify the harvester evaluation process during a 3-month probation period. • Based on an interview with the Disnakertrans Kab. Labuhan Batu, that up to this surveillance audit, there were no recorded issues related to labor or industrial relations cases. • Until this audit and interview with the workers, there is no issue related to sexual harassment.
6.	<p>Feedbacks: LSM Laskar Merah Putih Kabupaten Labuhanbatu</p> <ul style="list-style-type: none"> • The NGO laskar Merah Putih always monitors the operational activities of PT ISJ and PT RSK, especially in relation to social community and employment aspects. • Until the surveillance audit was carried out, there were no issues related to social, environment and employment. • The CSR programs at PT ISJ and PT RSK have always been carried out well by paying attention to the needs of the villagers around the plantations. The company is not proven to have employed child or underage workers. • To date, there have been no cases related to coercion or violence perpetrated against workers. <p>Audit Team verification and response:</p> <ul style="list-style-type: none"> • The company always cooperates with local NGOs to be able to provide each other with input related to the management of oil palm plantations. • This is a positive response and the company will always be committed to always running the company in accordance with company policies and applicable laws and regulations. • Based on document verification, interviews with Trade Unions and several workers, that no child labor, forced labor or violence against workers were identified • The program to improve the welfare of the surrounding community is included in the CSR program and involve community leaders and village heads around to formulate CSR programs on period 2022-2023.

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	<p>In 2023 the company has compiled 20 types of programs, including programs to improve the welfare of the surrounding community</p> <p>The realization of the CSR program for the 2023 period (until April 2023) is as follows:</p> <ol style="list-style-type: none"> 1. March 3, 2023; provided assistance for the construction and repair of roads in the Sidokuku Lestari Hamlet, Kampung Padang Village 2. On April 15, 2023 provided basic needs assistance in the form of rice (@5 kg) and 50 packages of syrup to the poor in Tanjung Harapan Village. <p>The Program Plan is recorded in the CSR Tracking 2022 - 2023 document, including:</p> <p>Create Share Value (CSV): the progress of CSV development up to 2021 - 2023 is the collaboration between PT ISJ and the Tebing Tinggi Consumer Cooperative of the Prosperous Group with 580 members of oil palm smallholders with an area of 1,320 Ha.</p>
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List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
Nil	-	-	-	-	-
<p>Note:</p> <ol style="list-style-type: none"> 1. PT Indo Sepadan Jaya, Tanjung Selamat Mill, Tanjung Selamat Estate and PT Rantau Sinar karsa – Pangkatan Estate has established since 1985 and has planting palm oil since 1984. Currently the palm oil has been replanted since 2012 – 2020. 					

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



3.5 Impartiality and conflict of interest

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

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Formal Signing-off of Assessment Conclusion and Recommendation

The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that PT **Indo Sepadan Jaya- Tanjung Selamat Mill** 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 Indo Sepadan Jaya- Tanjung Selamat Mill** is remain certified.

Report prepared by	Acceptance of Assessment Conclusion
Name: Mujinius Jalaraya	Name: Putu Ghryate Yonata Aksa
Company Name: On behalf of BSI Services Malaysia Sdn.Bhd.	Company Name: PT Indo Sepadan Jaya – Tanjung Selamat Mill
Title: Lead Auditor	Title: Sustainability Manager
Signature: 	Signature: <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i> 
Date: 24/08/2023	Date: 07/09/2023

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Appendix A: Summary of Findings

Criterion / Indicator	Assessment Findings	Compliance	
<p>Principle 1: Behave ethically and transparently Drive ethical business behaviour, build trust and transparency with stakeholders to ensure strong and healthy relationships.</p>			
<p>Criteria 1.1: The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.</p>			
<p>1.1.1</p>	<p>(C) Management documents that are specified in the RSPO P&C are made publicly available.</p>	<p>There are no changes from the list of document types and information accessible to stakeholders established in January 2022 in the form of "<i>Daftar Dokumen dan Informasi Untuk Diakses Publik</i>", where there are 32 types of documents grouped in several aspects which refers to RSPO principles and criteria, including:</p> <p><u>Legalities:</u></p> <ul style="list-style-type: none"> • Land titles/user rights (Izin Lokasi, Izin Prinsip, IPKH, Sertifikat HGU, HGB and IMB) <p><u>Employment, safety and health:</u></p> <ul style="list-style-type: none"> • Occupational health and safety plans and reports (Laporan Pelaksanaan P2K3) • Compulsory employment report every year. <p><u>Environmental:</u></p> <ul style="list-style-type: none"> • Plans and impact assessments relating to environmental and social impacts (AMDAL, Environmental licensing and Environmental Management Program) • HCV & HCS documentation (Conservation Management Plan, HCV) • Pollution prevention and reduction plans (Environmental Management 	<p>Complied</p>

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		<p><u>Social and Human Right:</u></p> <ul style="list-style-type: none"> • Report, Social Impact Assessment and HCV Identification Report) • Program, Hazardous waste Report, Land Application Report and also Report of physical and chemical analysis of river water) • Details of complaints and grievances (Procedure of Information handling, Procedure of "keluhan konflik lahan" and records of and recording of deliberation process and compensation). • Negotiation procedures (Recording of deliberation process and compensation) • Continuous improvement plans (Continuous Improvement Program) • CSR programs and realization • Human Rights Policy (including in the Company Policy update on 1 December 2019 and has been dissemination to all operation at workplace on 17 January 2021) • FFB price information for FFB suppliers • Forest service report (<i>Karhutla: Kebakaran Hutan dan Lahan</i>) <p>The list of documents and information provides in Bahasa Indonesia and the form can be understand with all stakeholders. The list of information has been dissemination at the time of with the company Policy on 21 January 2020 to all operation at workplace at PT ISJ and on 11 January 2021 at PT RSK.</p> <p>Based on the results of interviews with several stakeholders (Head of Senah Village and Kmapung Padang Village) that there is no difficulty in obtaining information.</p>	
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders.	Based on public consultation with government agency in Labuhan Batu Regency and village representative from Kampung Padang and Sennah	Complied

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		<p>Village obtained information that the company shared the information to the relevant stakeholder in Bahasa Indonesia and accessible to the stakeholder according to his interests.</p> <p>For example, regular report to the government agencies, CSR program, FPIC procedure, complain and grievance mechanism, socialization of HCV area to the respective villagers and so on. During the onsite audit sighted the sign board of company's information (name and location, land title information and validity), boundary poles and HCV that written in Bahasa Indonesia.</p>	
1.1.3	(C) Records of requests for information and responses are maintained.	<p>There are no changes, that the requests for information are responded by the department concerned in accordance with their authority. The company has developed a matrix describing the status of each information request and responsible to respond into.</p> <p>The company has replaced the previous Public Relations in the name of Mr. Hariadi with a new one, namely Mr. Evi Sairi as of April 1, 2023 based on the Appointment Letter from the HRD Ops Manager. RO-I AAS Mr. Hendra Kusuma No, 013/HR-RO1/EXT/04/2023 to serve as Public Relations at PT ISJ and PT RSK.</p> <p>Records of response of request information documented in the same book, consist of person handle the request, information given and acknowledgement from the person in-charge and signature. Record of incoming communication available in each estate and mill unit.</p> <p>The Company has consistently documented responses to requests for information from stakeholders. The request for information was recorded on Logbook "Surat Masuk dan Keluar", taken example:</p> <p>The company can demonstrate the document granting information to relevant agencies and other stakeholders appropriate regulations, including routinely convey reports as below:</p> <ul style="list-style-type: none"> • PT RSK's Environmental Permit Monitoring Report for the period January – June 2022 & July – December 2022, has been submitted 	Complied

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		<p>to the Environmental Office of Labuhanbatu District on January 11, 2023.</p> <ul style="list-style-type: none"> • Submission of the Surface Water Use Report for the period Jan-Mar 2023 to the Regent of Labhanbatu on May 8, 2023. • Submission of the RKL/RPL Environmental Management Report for the period July – December 2022 to the Environmental Office of Labuhanbatu Regency and North Sumatra Province on December 16, 2022. • Submission of the Hazardous Waste Temporary Storage Report for the period July – September 2022 to the Environmental Office of Labuhanbatu Regency on October 27, 2022. <p>Some examples of requests for information from stakeholders around PT ISJ and PT RSk plantations, including:</p> <p><u>Tanjung Selamat Estate:</u></p> <p>A request for information from the management of the Sepadan Jaya Mosque in Hamlet IV of Kampung Padang Village on March 11, 2023 regarding requests for financial assistance for Isro Miraj celebration activities, this request for information has been responded to on March 15, 2023 by providing financial assistance to the management of the Mosqued Sepadan Jaya.</p> <p><u>Pangkalan Estate/PT RSK:</u></p> <p>Request for information from SMK Methodis on January 16, 2023 Letter No. 420/01.SMK. M/2023 regarding the Application for the implementation of student work practices, it has been responded by company on January 17, 2023 by submitting the letter with note please complete the submission form and fill in the applicant's identity. Company has accept the application for student work practices from SMK Methodis accordingly.</p>	
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1.1.4	(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official.	There are no changes related to the mechanism of consultation and communication, that is Procedure of consultation and communication is records on SOP No. AAGL-5008.1-R1: <i>Penanganan Permintaan Informasi Stakeholder</i> . This procedure was communicated with stakeholder by Mr. Evi Sairi (Public Relations of PT ISJ and PT RSK) in January 2022 and attended by 11 participants of stakeholder surrounding the plantation. The company has replaced the previous Public Relations in the name of Mr. Hariadi with a new one, namely Mr. Evi Sairi as of April 1, 2023 based on the Appointment Letter from the HRD Ops Manager. RO-I AAS Mr. Hendra Kusuma No, 013/HR-RO1/EXT/04/2023 to serve as Public Relations at PT ISJ and PT RSK.	Complied
1.1.5	An up-to-date list of contacts and detailed stakeholder information is available along with designated representatives.	The companies PT ISJ and PT RSK have updated the list of stakeholders as of February 2023. The List of stakeholders consists of several types of stakeholders based on regional levels: village, provincial and national districts, including NGO, for example: Sawit Watch and Greenpeace Southeast Asia. The list of stakeholders presented in detail about the address, name of person and phone number and position and title, the list is including of Environment Agency, Labour Agency, Plantation Agency and national land agency of Labuhan Batu Regency, police institution, local and national nongovernment agency, Subdistrict head of Pangkatan and Kampung Rakyat, Village Head of Kampung Padang, Tanjung Selamat and Sennah.	Complied
Criteria 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.	There are no changes related to the Company's Policy on the Company's Code of Ethics signed by President Director Mr. Kevin Tio on December 1, 2019. Human rights policies, ethical behavior have been socialized/conveyed to all levels of employees of PT ISJ and PT RSK on	Complied

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		<p>November 17-18, 2022 (list of participants can be displayed), socialization to stakeholders (including local contractors) on November 21-23, 2022 which was attended by 15 and 21 stakeholders.</p> <p>Consistently this policy has been applied by PT ISJ and PT RSK in all its operations, such as in transaction activities, recruitment of workers and cooperation contracts with external parties/contracts (other 2nd party).</p> <p>In the employee selection process, the company has established policies related to business ethics behavior in the Daily Work Agreement (<i>Perjanjian Kerja Harian</i>-Daily Work Agreement) which is outlined in the annex to the company's policies and behaviors that must be complied with. PKB is a collective labor agreement for permanent workers that has been revised, namely for the period 2022-2024, also affirmed about business ethics behavior in article 16 related to business ethics behavior in the company.</p>	
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.	<p>Management Unit Estate and Mill has mechanism regarding to monitor compliance and the implementation of the policy and overall ethical business practice. The mechanism to monitor the implementation of company policies, especially related to the code of ethics policy, is carried out in several ways, including: In workers who are carried out every morning before doing work at 06.00 delivered by the field supervisor (Foreman) concerned, this activity is called the "morning circle – <i>Lingkaran Pagi</i>". At the time of contract revision with the contractor (because the validity period has expired), the company always relays to all contractors about the business ethics behavior that is subsequently carried out by the contractor. All contract with third party has been include the clause of ethical business practices. Vendor evaluation also conducted to monitor the contractor performance and the compliance of contract term of reference including ethical business practices.</p>	Complied

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		<p>Monitoring related to company policies implementation is also carried out through regular visits to the Department of Agronomy for Estate and the Department of Engineering for Mills and RSPO internal audit. The last Agronomy Department (VA- <i>Visit Agronomy</i>) Visit was conducted on March 30 – April 6, 2023. During this visit, monitoring the operational activities of Tanjung Selamat Estate and Pangkatan Estate, monitoring and evaluating related to labor, FFB production, costs incurred. The last Engineering Department visit (VE- <i>Visit Engineering</i>) was conducted on 19 April 2023; latest internal audit for RSPO was conducted on 13-15 September 2022.</p> <p>Based on site visits and interviews with representative workers during field audits, information was obtained that all workers must be committed to and comply with the company's social policies. Violation of these social policies can result in soft sanctions (warning letters) to severe sanctions (termination of employment).</p>	
<p>Principle 2: Operate legally and respect rights</p>			
<p>Implement legal requirements as the basic principles of operation in any jurisdiction.</p>			
<p>Criteria 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.</p>			
2.1.1	<p>(C) The unit of certification complies to relevant regulations.</p>	<p>There are no changes related to the mechanism for ensuring compliance with applicable legal requirement. It was stated on "<i>Prosedur Pemenuhan Peraturan Perundang - undangan dan Perubahannya</i>" (SOP AA-GL-5001.1-R0), dated 5 December 2009. The implementation of this procedure has been carried out consistently by the company. Evidence of implementation of legal requirements compliance evaluation is documented in "<i>Status Evaluasi Per September 2022</i>".</p> <p>Document of "Evaluasi Kepatuhan Hukum" is the system used for tracking any changes in laws and regulations. Evaluation of compliance with the regulation has updated on September 2022. Updating, for example:</p>	Complied

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		<ol style="list-style-type: none"> 1. Government Regulation no. 35 of 2021 concerning Work Agreements for Specific Periods, Outsourcing, Working Time and Rest Time and Termination of Employment. 2. Government Regulation no. 26 of 2021 concerning Implementation of the Agricultural Sector. 3. Law no. 11 of 2021 concerning Cipta Kerja 4. Government Regulation no. 22 of 2021 concerning the Implementation of Environmental Protection and Management 	
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>D&L and Humas-Public Relation Department has conducted annual evaluation of legal compliance. The last evaluation is on September 2022.</p> <p>In terms of evaluating laws and regulations, the company has obtained sources from the D&L Dept. to be able to update the latest legislation. The latest laws and regulations have been disseminated to related parties, for example: workers, contractors and related operational departments. This socialization is usually presented directly from the relevant Government Regency Offices.</p> <p>Some of the latest regulations that have been evaluated for compliance as of September 2022, include:</p> <ul style="list-style-type: none"> - PP No. 35 of 2021 concerning Perjanjian Kerja Waktu Tertentu, Alih Daya, Waktu Kerja dan Waktu Istirahat, dan Pemutusan Hubungan Kerja - Peraturan Pemerintah no. 36 of 2021, concerning Wages. - Peraturan Pemerintah No. 22 of 2021 concerning the Implementation of Environmental Protection and Management - Regulation of the Minister of Women's Empowerment and Child Protection Number 7 of 2022 concerning Improving Family Quality in the Development of Women's Empowerment and Child Protection 	Complied

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		<p>- Government Regulation No. 6 of 2023 concerning Cipta Kerja</p> <p>Based on verification of documents related to compliance with laws and regulations, including PKWT/PHL work contracts, contractor work contracts (2nd and 3rd parties), that the application of laws and regulations has been implemented in accordance with applicable laws and regulations.</p>	
2.1.3	<p>Legal or authorized boundaries are clearly demarcated and visibly maintained and there is no planting beyond these legal or authorized boundaries.</p>	<p>Based on field observation in each estate concluded that boundary poles are in good condition and maintained as follows:</p> <ol style="list-style-type: none"> 1. Tanjung Selamat Estate: <ul style="list-style-type: none"> - BPN Pole Boundary No. 13 at block B16 c Afdeling 2 with well maintained condition - BPN Pole No. 15 at block B16i Afdeling 2 with well maintained condition - BPN Pole No. 23 at block C14e Afdeling 3 with well maintained condition - BPN Pole No. 24 at block C14g Afdeling 3 with well maintained condition. 2. Pangkatan Estate: During field visit to Pangkatan Estate, it was found that the pole has been maintained well: <ul style="list-style-type: none"> • Pole BPN No. 001, location on block A16e, Afdeling I, verification in good condition, clean and maintained. • Pole BPN No. 45, location on blok B07a, Afdeling I, verifikasi verification in good condition, clean and maintained. <p>Report on inspection and maintenance of HGU boundary markers for the January 2023 period was available during audit, in which all stakes have been monitored and checked in the field.</p>	Complied
<p>Criteria 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.</p>			

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2.2.1	A list of contracted parties is available.	Based on document review during ASA1.2, organization has a list of contracts, and it is well maintained in the format of "Monitoring of List of Contractor period 2022/2023", there are 4 contractors in estates and 2 contractors for Mill including FFB suppliers. Monitoring is carried out to monitor the type of work, job period, job progress as well as BAP status/payment of contract.	Complied
2.2.2	All contract, including those for FFB supply, contain specific clause on meeting relevant legal requirements and this can be demonstrated by the third party.	<p>Based on document review during ASA1.2, organization has a list of contracts, and it is well maintained in the format of "Monitoring of List of Contractor period 2022/2023", there are 4 contractors in estates and 2 contractors for Mill including FFB suppliers. Monitoring is carried out to monitor the type of work, job period, job progress as well as BAP status/payment of contract.</p> <p>Contract document verified for example:</p> <ul style="list-style-type: none"> • Perjanjian Pelayanan Jasa No. 09/SPJ/LEG-ISJ/I/23 dated 18 January 2023 between PT Indo Sepadan Jaya and PT Buana Putra Jaya Lestari for Employee Housing Construction type E1-40 at Tanjung Selamat Estate • Perjanjian Pelayanan Jasa No. 08/SPJ/LEG-RSK/I/23 dated 18 January 2023 between PT Indo Sepadan Jaya and PT Buana Putra Jaya Lestari for Employee Housing Construction type E1-40 at Pangkatan Estate. <p>Based on the agreement document (Contract cooperation agreement) that have been verified above, there are explanations on legal requirements, employment (including wages) and compliance with legislation and obligations to respect human rights and business ethics in article 1 No. 6- 9; and No. 13 related to business ethics.</p>	Complied
2.2.3	All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour.	Based on document review during ASA1.2 it was known that third party contract including for FFB supplier has completed with some important clause such as:	Complied

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		<ul style="list-style-type: none"> The company policy related to children/underage worker, anti-drugs etc. Worker's payment referred to local minimum payment's regulation. All workers will be register in health insurance and workers insurance according to national regulation. <p>The same regulation also implemented in smallholder scheme. All of contract data kept by Head Clerk in Estates and Mill.</p>	
Criteria 2.3: All FFB supplies from outside the unit of certification are from legal sources.			
2.3.1	<p>(C) For all directly sourced FFB, Palm Oil Mill (POM) requires:</p> <ul style="list-style-type: none"> Information regarding the geolocation of FFB origins; Proof of ownership status, right/claim of the land by grower/smallholder; If relevant, valid planting/operational/trading license, or is part of a cooperative which allows the buying and selling of FFB. 	<p>Based on document verification and interview to the management during ASA1_2, it was known that the unit of certification already has a list of directly sourced of FFB supplier, there are five (5) directly sourced of FFB supplier that has identified by the company namely:</p> <ol style="list-style-type: none"> Koperasi Perkebunan Anugrah Jaya Mandiri Sejahtera Koperasi Mandiri Tani Sejahtera (MTS) CV Bumdes Tebing Tinggi Pangkatan Sejahtera (TTPS) Roma Iwan Haryono (IWH) <p>The sample document for the requirement of indicator 2.3.1 has shown during audit namely Koperasi Perkebunan Anugrah Jaya Mandiri Sejahtera, as per purchase contract No. 001/TBS/ISJ/2022 dated 1 May 2022 between PT ISJ and Koperasi Perkebunan Anugrah Jaya Mandiri Sejahtera. The contract has covered the land status, legal requirement and other policy related to RSPO requirements. In addition, mill also validated the geo location of plots.</p> <p>Verified sample:</p> <ul style="list-style-type: none"> Syahrul Syahroni, with area 1.3 Ha; geolocation E 100° 4' 43.44" N 2° 5' 35.52"; land status SKGR (<i>Surat Keterangan Ganti Rugi</i>) 	Complied

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		<p>No. 592.2/116/PEM/2017 dated 02/11/2017.</p> <ul style="list-style-type: none"> - Jul Herman Lubis, with area 2 Ha; geolocation E 100° 5' 38.76" N 2° 6' 22.67" ; land status SHM (<i>Sertifikat Hak Milik</i>) No. 02.12.04.08.1.00165 dated 27/11/1991. - Lustriana S, with area 1.2 Ha; geolocation E 100° 5' 41.86" N 2° 6' 19.06" ; land status SHM (<i>Sertifikat Hak Milik</i>) SHM No. 02.12.04.08.1.00163 dated 27/11/1991. <p>Operational/Trading License: Nomor Induk Berusaha (NIB) No. 0311xxx from Lembaga OSS Badan Koordinasi Penanaman Modal dated 02 November 2021 on behalf Koperasi Perkebunan Anugrah Jaya Mandiri Sejahtera.</p> <p>Based on the agreement document (Cooperation Agreement contract), stated in Article 7 about responsibilities and obligations, described in relation to legal requirements and documentation, employees (including not to employ minors or child labor), human rights and business-ethics.</p> <p>Based on the agreement (Contract cooperation agreement) that have been verified as above, there are explanations on legal requirements, employment (including wage) and compliance with legislation and the obligation to respect human rights, disallowing child, force labor and business ethics in article 1 No. 6-9; and No. 13 related to business ethics.</p>	
2.3.2	For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in indicator 2.3.1.	<p>Based on document review and interview to the management during ASA1.2 it was known that there are 3 indirectly sourced FFB supply to Tanjung Selamat Palm Oil Mill. Company has agreement document (Cooperation Agreement contract), that in Article 7. About responsibilities and obligations, described in relation to legal requirements and documentation, employees (including not to employ minors or child labor), human rights and business-ethics.</p> <p>The indirect of FFB suppliers are CV Palta Jaya, Wan Juma Sari Dewi (WJD) and Wan Juma Sari Dewi-KS.</p>	Complied

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		<p>Verified sample for Wan Juma Sari Dewi:</p> <ul style="list-style-type: none"> - Masrokan, with area 0.6 Ha; geolocation E 100° 5' 29.91" N 2° 7' 20.52"; land status SKT (<i>Surat Keterangan Tanah</i>) No. 593/267/PEM/2005 dated 30/08/2005. - Yetti Sukmawati, with area 1.5 Ha; geolocation E 100° 4' 8.05" N 2° 5' 1.40"; land status SKGR (<i>Surat Keterangan Ganti Rugi</i>) No. 592.2/1138/PEM/2009 dated 11/11/2009. <p>Operational/Trading License for Wan Juma Sari Dewi is NIB (<i>Nomor Induk Berusaha</i>) has shown during audit.</p> <p>Based on the agreement (Contract cooperation agreement) that have been verified as above, there are explanations on legal requirements, employment (including wage) and compliance with legislation and the obligation to respect human rights, disallowing child, force labor and business ethics in article 1 No. 6-9; and no. 13 related to business ethics.</p> <p>Based on document verification and interview with Create Share Value (CSV) staff obtained information that both suppliers have been verified and visited by FFB purchasing staff.</p>	
<p>Principle 3: Optimise productivity, efficiency, positive impact and resilience</p>			
<p>Implement plans, procedures and systems for continuous improvement.</p>			
<p>Criteria 3.1: There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.</p>			
3.1.1	<p>(C) A business or management plan (minimum of three years) is documented and where applicable, includes a jointly developed business case for Scheme Smallholders.</p>	<p>A business management plan for long term economic feasibility has been documented by the Unit of Certification. The business management plan has included projection of production, quality planting material, mill extraction rates (OER and KER), upkeep cost, harvesting cost, transport cost, forecast price and capital expenditure.</p> <p>Management plan was set up including independent FFB suppliers. Its management plan includes:</p> <ol style="list-style-type: none"> 1. FFB Production projection 2023 – 2025 	Complied

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		<ol style="list-style-type: none"> 2. CPO, PK, production projection 2023 – 2025 3. OER, KER projection 2023 – 2025 4. Estate Cost Estimation: Upkeep cost, manuring cost, pest and disease management cost, pruning cost, census cost, terrace maintenance cost, road and bridge maintenance cost, harvesting cost. 5. Mill Cost, KCP Cost, Selling cost, Bulking cost and Tax portion actual 2022 and projection 2023 – 2025. 6. Replanting Program 7. Net Profit/Loss <p>Projection of Production 2023 - 2025:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th rowspan="2">Description</th> <th colspan="3">Year</th> </tr> <tr> <th>2023</th> <th>2024</th> <th>2025</th> </tr> </thead> <tbody> <tr> <td>FFB:</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Tanjung Selamat Estate</td> <td style="text-align: right;">123,407</td> <td style="text-align: right;">122,053</td> <td style="text-align: right;">121,732</td> </tr> <tr> <td>Pangkalan Estate</td> <td style="text-align: right;">95,117</td> <td style="text-align: right;">105,370</td> <td style="text-align: right;">111,319</td> </tr> <tr> <td>Total Own</td> <td style="text-align: right;">218,524</td> <td style="text-align: right;">227,423</td> <td style="text-align: right;">233,051</td> </tr> <tr> <td>3rd party</td> <td style="text-align: right;">135,000</td> <td style="text-align: right;">135,000</td> <td style="text-align: right;">135,000</td> </tr> <tr> <td>Grand Total</td> <td style="text-align: right;">353,524</td> <td style="text-align: right;">362,423</td> <td style="text-align: right;">368,051</td> </tr> <tr> <td>CPO:</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Own</td> <td style="text-align: right;">48,902</td> <td style="text-align: right;">52,291</td> <td style="text-align: right;">54,675</td> </tr> <tr> <td>3rd Party</td> <td style="text-align: right;">23,895</td> <td style="text-align: right;">23,895</td> <td style="text-align: right;">23,895</td> </tr> <tr> <td>Grand Total</td> <td style="text-align: right;">72,797</td> <td style="text-align: right;">76,186</td> <td style="text-align: right;">78,570</td> </tr> </tbody> </table>	Description	Year			2023	2024	2025	FFB:				Tanjung Selamat Estate	123,407	122,053	121,732	Pangkalan Estate	95,117	105,370	111,319	Total Own	218,524	227,423	233,051	3 rd party	135,000	135,000	135,000	Grand Total	353,524	362,423	368,051	CPO:				Own	48,902	52,291	54,675	3 rd Party	23,895	23,895	23,895	Grand Total	72,797	76,186	78,570	
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		PK:				
		Own	10,817	11,257	11,536	
		3rd Party	6,683	6,683	6,683	
		Grand Total	17,500	17,940	18,219	
3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available.	There is no replanting plan during audit because currently all are immature and mature plant, based on document review during ASA1_2 it was known that the last replanting is conducted in Y2020.				Complied
3.1.3	The unit of certification holds management review at planned term according to the scale and nature of the activities undertaken.	<p>Based on document review during ASA1_2, it was known that management review for Tanjung Selamat POM conducted on 23 September 2022, attended by Technical Manager Labuhan Batu, Mill Manager, Mill Assistant, KTU, Biogas Assistant and Sustainability Assistant. The management review has discussed:</p> <p>a. Result of internal audit that conducted on 13-15 September 2022: For the internal audit of RSPO, there are no discrepancy to the requirements.</p> <p>b. Customer feedback; Feedback from customers can be conveyed through the mechanism of stakeholder information. The company also provides a feedback receipt logbook to monitor the response when there is input from consumers.</p> <p>c. Process performance; Tanjung Selamat Palm Oil Mill has scheduled VE visits, as a supervision for regular mill performance (once a year). If there is input from the VE visit, it is in the form of quick input, which is immediately corrected and reported back in the form of observations that can be checked at the next visit. The issues are related to maintenance of FFB conveyor in Station FFB Conveyor, housekeeping of Loading Ramp Station,</p>				Complied

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		<p>Maintenance of pressure recorder in Sterilizer Station and the maintenance of Empty Bunch Press Station.</p> <p>d. Preventive Action; For the non-conformity of the unit regarding the RSPO SCCS, POM has determined the Preventive Action for the issues.</p> <p>e. Follow Up Action; For the non-conformity of the unit regarding the RSPO SCCS, POM has determined the Follow Up Action for the issues.</p> <p>f. Change that effects the Management System; Revising some mechanism related RSPO SCCS.</p> <p>g. Point Recommendation (a-f) Increased Effectiveness: Evaluations will be conducted periodically along with subsequent management reviews. Develop Table of Achievements - Minimizing nonconformities in RSPO SCCS.</p> <p>Resources needed: increasing knowledge through training.</p>	
<p>Criteria 3.2: The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.</p>			
3.2.1	<p>(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impact and opportunities of the unit of certification.</p>	<p>Action Plan Tanjung Selamat Estate and Pangkatan Estate for Y2022/2023 is still continuing the previous program:</p> <p>1. Problem:</p> <ul style="list-style-type: none"> ➤ Domestic waste. ➤ Reduced Resources due to electricity usage. ➤ Decrease the use of pesticides. <p>2. Objective:</p>	Complied

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		<ul style="list-style-type: none"> ➤ Equalize electricity usage in all employee houses. ➤ Regular engine service and vehicle emissions testing once a year. ➤ Minimize greenhouse gas effect. <p>3. Program:</p> <ul style="list-style-type: none"> ➤ Use of paper back and forth; use used paper for internal documents. ➤ Monitoring of installation of 900W KWH meter in each house. ➤ Regular engine service and vehicle emissions testing once a year. <p>4. PIC:</p> <ul style="list-style-type: none"> ➤ Division Assistant and KTU. ➤ All Assistant. ➤ Transport Assistant ➤ Division Assistant. <p>Action Plan Operation for Y2023:</p> <p>The action plan is still continuing the previous program namely increase Output of Dump Truck from 23.00 Ton/Unit to be 25.0 Ton/Unit and the acceleration of the transportation of FFB from 07.00 to 19:00.</p> <p>Continuous improvement in mill to reduce losses kernel form 0.08% to 0.05%. The improvement starts with recovering CBC blade in kernel station, reset the dumper position and monitored the leakage in ducting. This improvement starts from January 2023. Based on the daily production, the losses now are around 0.08% - 0.071% below the budget 0.090%.</p>	
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3.2.2	As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat by Certification Body during Annual Surveillance Assessment by using the RSPO metrics template.	<p>RSPO Annual Communication of Progress 2020 of PT Inti Indosawit Subur has been available in RSPO website under membership number 1-0022-06-000-00. At the time of the audit, the RSPO Metrics template has been shown during audit.</p> <p>The auditor has verified the RSPO Metric template that has been sent by client before the audit, the RSPO Metrics Templates has been verified and the data is appropriate.</p>	Complied
Criteria 3.3: Operating procedures are appropriately documented, consistently implemented and monitored.			
3.3.1	(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.	<p>Tanjung Selamat Estate and Pangkatan Estate have demonstrated procedures for estate operation, starts from land preparation including replanting up to harvesting, there is no change related to SOP until this ASA1_2, the SOPs such as:</p> <ol style="list-style-type: none"> 1. SOP AA-APM-OP-1100.01-R4 dated 5/09/2016 <i>Pembibitan</i>; explains Nursery. 2. SOP AA-APM-OP-1100.02-R3 10/06/2015 <i>Penanaman Areal Baru</i>; explains New Area Palnting. 3. SOP AA-APM-OP-1100.03-R2 24/07/2015 <i>Pembuatan dan Perawatan Jalan dan Jembatan</i>; explains road and bridge construction and maintenance. 4. SOP AA-APM-OP-1100.04-R3 07/12/2015 <i>Pembuatan dan Pemeliharaan Parit</i>; explains culvert/drainage construction and maintenance. 5. SOP AA-APM-OP-1100.05-R3 23/11/2016 <i>Konservasi Tanah dan Air</i>; explains Soil & Water Conservation. 6. SOP AA-APM-OP-1100.06-R6 16/02/2017 <i>Menanam Kacangan</i>; related to Planting cover crops. 7. SOP AA-APM-OP-1100.07-R6 16/02/2017 <i>Menanam Kelapa Sawit</i>; related to Planting Oil Palm. 	Complied

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		<p>8. SOP AA-APM-OP-1100.08-R6 11/05/2016 <i>Pengendalian Gulma</i> or Weed control.</p> <p>9. SOP AA-APM-OP-1100.09. R5 5/09/2016 <i>Pemupukan</i>; related to Fertilizer application.</p> <p>10. SOP AA-APM-OP-1100.10. R6 23/11/2016 <i>Pengendalian Hama dan Penyakit</i>; explains Pests & Disease Control.</p> <p>11. SOP AA-APM-OP-1100.11. R1 01/02/2009 <i>Pestisida dan Pengendaliannya</i>; explains for pesticide handling.</p> <p>12. SOP AA-APM-OP-1100.12. R3 23/11/2016 <i>Kastrasi</i>; explains castration (cutting all generative product (male flower, female flower, all fruit, to support vegetative growth) – done 5-6 months before being harvested.</p> <p>13. SOP AA-APM-OP-1100.13. R3 04/03/2016 <i>Tunas Pokok</i> for pruning.</p> <p>14. SOP AA-APM-OP-1100.14. R3 16/02/2017 <i>Sensus dan Identifikasi Pokok</i>; explains census and palm identification;</p> <p>15. SOP AA-APM-OP-1100.15. R2 01/10/2010 <i>Sensus Produksi</i> related to production census.</p> <p>16. SOP AA-APM-OP-1100.16. R1 01/02/2009 <i>Konsolidasi Pohon Tumbang</i>; explains provision of support to fallen palm.</p> <p>17. SOP AA-APM-OP-1100.17. R1 23/10/2014 <i>Pengelolaan Air</i>; related to water management.</p> <p>18. SOP AA-APM-OP-1100.18. R3 20/04/2015 <i>Potong Buah</i> related to harvesting.</p> <p>19. SOP AA-APM-OP-1100.19. R1 01/02/2009 <i>Pengelolaan Transport</i> explains FFB Transport.</p> <p>20. SOP AA-APM-OP-1100.20-R6 16/02/2017 Replanting.</p>	
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		<p>Tanjung Selamat POM has established a procedure to process the FFB to become CPO and PK starts from reception of FFB to dispatch of CPO and PK, there is no change related to SOP until this ASA1_2, the SOPs such as:</p> <ol style="list-style-type: none"> 1. SOP AA-MPM-OP-1400.02. R2 <i>Stasiun Penerimaan</i> for FFB receiving station. 2. SOP AA-MPM-OP-1400.03.R1 <i>Stasiun Rebusan</i> for sterilizer. 3. SOP AA-MPM-OP-1400.04.R1 <i>Stasiun Pemisahan Berondolan</i> for loose fruit separation. 	
3.3.2	A mechanism to check consistent implementation of procedures is in place.	<p>The unit of certification has a mechanism to check consistent implementation of procedures is in place, namely internal audit that conducted by Agronomy Dept and Engineering Dept, and Sustainability Dept. Monitoring on palm oil mill operation recorded on Visit Engineering (VE) report, e.g., VE report of Tanjung Selamat POM, date of visit 19 April 2023, report "Laporan Kunjungan HM" by Sahat M Sibuea. Main issues: Housekeeping in the POM area, Loading Ramp Station (there is a plastic waste in the parking lory, bearing housing for FFB conveyor No. 2 is not centered, steam pipe 1" for conveyor chain cleaning is damaged. Monitoring of estate operation recorded in Visit Agronomy (VA) report, e.g., VA report of Tanjung Selamat Estate, dated 7-11 March 2022 by Mr Simon Sihotang. Main issues: circle path cleanliness, pest and disease (Petroma pendula infestation and ganoderma found, and 1 owl cage in active condition), harvesting (loose fruit found), Road (potholes and bumpy roads are found).</p>	Complied
3.3.3	Records of monitoring and any actions taken are maintained and available.	<p>The unit of certification has done monitoring on palm oil mill and estates operation. Monitoring on palm oil mill operation recorded on Visit Engineering (VE) report, e.g., VE report of Tanjung Selamat POM, date of visit 19 April 2023, report "Laporan Kunjungan HM" by Sahat M Sibuea. Main issues: Housekeeping in the POM area, Loading Ramp Station (there is a plastic waste in the parking lory, bearing housing for</p>	Complied

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		<p>FFB conveyor No. 2 is not centered, steam pipe 1" for conveyor chain cleaning is damaged. Action taken has been done by housekeeping improvement and cleaning, repairing the bearing housing and conveyor chain cleaning. Evidence of action taken available in VE report.</p> <p>Monitoring of estate operation recorded in Visit Agronomy (VA) report, e.g. VA report of Tanjung Selamat Estate, dated 7-11 March 2022 by Mr Simon Sihotang. Main issues: circle path cleanliness, pest and disease (Petroma pendula infestation and ganoderma found, and 1 owl cage in active condition), harvesting (loose fruit found), Road (potholes and bumpy roads are found). Action taken has been done by estate management with circle path weeds control, Ganoderma identification and control, loose fruit picking and briefing with harvester, road maintenance. Evidence of action taken available in VA report.</p>	
<p>Criteria 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.</p>			
3.4.1	<p>(C) SEIA in new planting or operation including mills, is conducted independently and participatively by involving the affected stakeholders, inclusive of impact assessment from the smallholder/outgrower scheme (if any). The assessment is to be documented.</p>	<p>There is no new planting at PT Indo Sepadan Jaya Tanjung Selamat POM and its Supply bases (Tanjung Selamat Estate & Pangkatan Estate). Tanjung Selamat Estate has been planted since 1992, 1993, 1995, 1997 and 1998. Tanjung Selamat Estate has conducted replanting since 2012 – 2017 while Pangkatan Estate has conducted replanting since 2015 – 2020.</p> <p><u>PT Indo Sepadan Jaya</u></p> <p>During audit ASA 1.2 there is no changing and extension to scope related to the mill and estate operation.</p> <p>The preparation of the SEIA report is based on the Terms of Reference for SEL (KA-SEL) "<i>Kerangka acuan Studi Evaluasi Lingkungan</i>" which was approved by the Central AMDAL Commission of the Ministry of Agriculture No. 998/AMDAL/V/1993, May 4, 1993, and the results of field surveys at the study site.</p>	Complied

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		<p>Social Impact Assessment was conducted as documented in "<i>Study Evaluasi Lingkungan</i>" which covering social impact assessment. Ministry Agriculture has approved this SEL (<i>Studi Evaluasi Lingkungan</i>) based on decree No. RC.220/385/B/II/94.</p> <p>Tanjung Selamat Estate has conducted replanting since 2012 – 2017. Replanting activity has been included in the SEIA documents.</p> <p>In 2019, PT Indo Sepadan Jaya was develop the Biogas Plant and make the addendum of SEIA to include the activity in the SEIA document. Company has obtain the permit for Biogas Plant according to "Keputusan Kepala Dinas Penanaman Modal dan Pelayanan terpadu Satu Pintu Kabupaten Labuhan Batu Nomor 503.660/117/DPMP TSP-BP2MNP/2019 Tanggal 20 Februari 2019 Tentang Perubahan Izin Lingkungan Kegiatan Perkebunan Kelapa Sawit Pabrik Minyak Kelapa Sawit dan Biogas Plant yang terletak di Desa Kampung padang Kecamatan pangkatan Kabupaten Labuhan Batu.</p> <p><u>PT Rantau Sinar Karsa</u></p> <p>During audit ASA 1.2 there is no changing on social environmental impact assessment of PT Rantau Sinar Karsa.</p> <p>The preparation of the SEL report is based on the Terms of Reference for SEL (KA-ANDAL) which was approved by the Central AMDAL Commission of the Ministry of Agriculture No. 49/AMDAL/V/1993, May 4, 1993, and the results of field surveys at the study site.</p> <p>Social Impact Assessment was conducted as documented in "Study Evaluasi Lingkungan" (SEL) which covering social impact assessment. Ministry Agriculture has approved this SEL based on decree No. RC.220/383/B/II/94 dated 26 February 1994.</p> <p>During SEL, the company conducted stakeholders meeting with surrounding local communities which affected the project, e.g. Public consultation on 12th March 2014 involved representative from 3 villages</p>	
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		(Kampung Padang Village, Sennah Village and Perlabian Village) and attended 66 participants.	
3.4.2	For the unit of certification, a SEIA is available and social and environmental management plan and its monitoring have been developed with participation of affected stakeholders.	<p>During audit ASA 1.2 SEIA document were available and kept in office. Social and environmental management plan and its monitoring have been developed as per RKL – RPL document. RKL – RPL document is part of SEL document which has been communicated and involving the affected parties and stakeholder, e.g. Public consultation on 12th March 2014 involved representative from 3 villages (Kampung Padang Village, Sennah Village and Perlabian Village) and attended 66 participants.</p> <p>Social Environment management plan to prevent negative impact such as:</p> <ul style="list-style-type: none"> - To prevent air quality decrease, company performed action: Reduce exhaust emissions from the engines by maintenance routine engine, the use of anti-dust mask continuously for workers who are near the source of pollutants that exceed the threshold. - To prevent water quality decrease, maintaining green areas along the river banks, do not logging in the river banks area, planting land cover crop on the cliffs and prone to erosion areas, the use of wastewater for Land Application, solid waste utilization plant (shell, fibre) for fuel. - To prevent erosion: land clearing mechanically, land cover crop planting, terracing in slope. - To prevent wildlife habitat disturbance, place signboard to prohibit illegal hunting in conservation area and around estate, awareness to employee and surrounding community to save the protected species. - To increase job opportunities, provide employment opportunities to the local community, the provision of supporting infrastructure for public economic activities, providing employment opportunities information to the public. 	Complied

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		- To increase in public revenues, maximize the use of local labor, involving the local community as business partners.	
3.4.3	(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in participatory way.	<p>Implementation of social and environmental management and monitoring plan can be demonstrated as per "Laporan Hasil Pelaksanaan RKL – RPL". Report of RKL – RPL were reviewed, evaluated and reported each semester to government institution (DLH Kab. Labuhan Batu, DLH Provinsi Sumatera Utara, PPE Region Sumatera and Kementerian Lingkungan Hidup dan Kehutanan. Sample seen:</p> <ul style="list-style-type: none"> - Report of RKL – RPL PT Indo Sepadan Jaya semester I year 2022, reported on 16 December 2022. - Report of RKL – RPL PT Indo Sepadan Jaya semester II year 2022, reported on 16 May 2023. - Report of RKL – RPL PT Rantau Sinar Karsa semester I & II year 2022, reported on 11 January 2023. - Report of RKL – RPL PT Rantau Sinar Karsa semester II year 2022, reported on 16 May 2023. <p>Evidence of RKL – RPL report and its reporting evidence to government can be demonstrated during audit.</p> <p>There were no significant changes required in current practices of identification and evaluation of environmental aspect and impact.</p> <p>Environmental management and monitoring has been implemented such as:</p> <ul style="list-style-type: none"> - Water management by developing Watergate and drainage in peat soil area, water level monitoring to manage the water level in 40 – 60 cm under ground level. - Waste management according to the best management practice procedure: waste water management, biogas plant installation, hazardous waste management based on regulation 	Complied

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		<p>- Boiler and incinerator maintenance to prevent air pollution, emission monitoring for boiler, incinerator and generator set</p> <p>Report RKL – RPL are publicly available for stakeholder to be access and reviewed.</p>	
Criteria 3.5: A system for managing human resources is in place.			
3.5.1	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives in accordance with the applicable regulation.</p>	<p>There were no changes to the mechanism/procedures related to recruitment, selection, hiring, promotion, retirement and termination, namely: SOP No. SOP: AA-HR-305.2-R0 dated 1 February 2009 regarding "<i>Penerimaan Karyawan Baru</i>" (Recruitment and Employee Selection), this mechanism have been implemented consistently by PT ISJ and PT RSK, this was confirmed by the management of PT ISJ and RSK through a Memorandum issued by Group Manager Memorandum No. 034/ISJ-RSK/MEMO/IX/20 on 1 September 2020. The two mechanisms refer to the applicable laws and regulations, namely Law No. 1 of 2020 regarding the Job Creation Law, PP 35 of 2021 Regarding work agreements for a certain time, outsourcing, working time and rest time and termination of employment.</p> <p>This procedure has also been socialized to all workers through representatives of the PUK-SPPP-SPSI Workers' Union of PT ISJ (Bpk. Josmar Tamba) and PT RSK (Henri G. Sinaga) on 17 May 2022. The agenda discussed includes those related to hiring, promotions and employee transfers.</p> <p>Based on interviews with 5 harvest workers at Tanjung Selamat Estate and 3 workers at Pangkatan Estate, workers can access these documents and they understand them sufficiently. In fact, based on an interview with the Chairman of the PUK SPSI Workers' Union, Bpk. Henri G. Sinaga and Bpk. Josmar Tamba that in the explanation/socialization of the procedure regarding the recruitment process for the PUK SPSI trade union, a copy of the procedure was also obtained and pasted on the notice board at the PUK SPSI trade union secretariat.</p>	Complied

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3.5.2	Employment procedures are implemented and records are maintained.	<p>There was no changes related to employee’s mechanism in PT ISJ and RSK, including:</p> <ol style="list-style-type: none"> 1. SOP recruitment and employee selection No. SOP: AA-HR-305.2-r0 dated 1 February 2009 regarding “penerimaan karyawan baru” (recruitment and selection of employee), explained that: When candidates have passed in the process of selection, next recruitment sends the candidate in full data system averis into HR-it) to be made an agreement work (made 2 duplicate and should be sign by candidates in question. For example: <ul style="list-style-type: none"> - <i>Perjanjian Kerja Harian Lepas</i> – Daily Worker Agreement No. 076/PKHL/KTS/11/2021 dated 16 November 2021 on behalf of Anggi Irawan Nasution as upkeep of Tanjung Selamat Mill. This Daily worker agreement has made duplicate and held by each employee and company. 2. PT Indo Sepadan Jaya – Tanjung Selamat POM and Estate and PT Rantau Sinar Karsa – Pangkatan Estate has issued the specific labour policy and procedures for temporary workers (PHL/PKWT); The policy and procedure are issued for each unit as below: <ul style="list-style-type: none"> - Tanjung Selamat POM: Memorandum No. 009/Mill-PTS/INT/07/2020 dated 24 July 2020. - Tanjung Selamat Estate: Memorandum No. 171/ES-KTS/MEMO/07/2020 dated 23 July 2020. - Pangkatan Estate: Memorandum No. 266/ MEMO/INT/07/ 2020 dated 01 July 2020. 3. The mechanism to handle complaint from external party, as written in “Mekanisme Penanganan Keluhan” – complaint handling mechanism (Doc. No.SOP AA-GL- 5005-RO 01) while complaint from internal regulated under “Mekanisme Penyampaian Keluhan 	Complied
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		<p>dan Penyelesaian Keluhan Karyawan” – Employee’ complaint and resolution mechanism (Doc. No.SOP-AA-HR-3008-RO 05). SOP related to the payments No. AA-FA-219.1-R1: “Pengupahan” (Wages) dated 1 January 2008.</p> <p>Procedures/mechanisms related to employment have been consistently applied, for example: Implementation of the promotion of daily harvesting workers to permanent workers:</p> <p>1) <u>Tanjung Selamat Estate</u>:</p> <ul style="list-style-type: none"> - In 2022, there will be a promotion for hiring permanent workers (SKUH) for 28 harvesters at Tanjung Selamat Estate - In Semester I of 2023 the promotion of permanent worker appointments (SKUH) for harvesters is 6 harvesters <p>2) <u>Pangkalan Estate</u>:</p> <ul style="list-style-type: none"> - In 2022, 20 harvesters have been promoted to permanent workers (SKU). - In semester I of 2023 there will be 15 harvesters promoted. 	
Criteria 3.6: An Occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	(C) All operational activities risks assessed to identify the H&S issues. Mitigation plans and procedures are documented and implemented.	Certificate Holder has established the health and safety policy under “Kebijakan Perusahaan”, signed by Managing Director of Asian Agri Group, on 1 st December 2019 Point 3. Committed to implement and maintain occupational health and safety management system in compliance with national and international applicable regulation. The policy has not changes during this surveillance audit. The policy was communicated to all employees and displayed at strategic locations of Mill and Estates and communicated to employees including contractor workers on 13 January 2023.	Non-compliance

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		<p>OHS risk assessment procedure SOP "<i>Identifikasi bahaya, Penilaian Resiko dan Penentuan Pengendali</i>" AA-SMK3-02-R0 dated 3 August 2017 was established and implemented for Mill and Estates activities both routine and non-routine activities. Hierarchy of control was considered for planning of risk control. According to the procedure, the OHS risk assessment and analysis must be reviewed once a year. Risk assessment in plantation were available.</p> <p>OHS training has been programmed and provided and balanced with OHS hazard and risk at Mill and Estates. Basic OHS training performed internally by safety officer in charge at mill and estate, the training record and programme related to OHS were sighted and verified during this audit ASA 1.2. e.g. licenses for boiler operator, licence for operator of generator set, licence of heavy equipment operator, pesticide training for sprayers, etc.</p> <p>Tanjung Selamat Estate, Tanjung Selamat Mill and Pangkatan Estate have conducted Hazard Identification & Risk Assessment and Control (HIRAC)/Risk Analysis revision and reviewed as well in January 2023. It consists of a risk assessment, controlling and its control targets. From the results of the review in January 2023, the OHS work program for the period of 2023 was made, where this program is a control to reduce or mitigate the risk of accidents, which included:</p> <ol style="list-style-type: none"> 1. OHS Inspection: PPE provision and inspection, Worker housing inspection. 2. Regular checking emergency response facilities and infrastructure: APAR, Hydrant, etc. 3. Safety Training Program: Emergency and Fire Training, Safety Briefing (Routine). 4. Expertise Training Program for several operators (i.e: tractor operators, heavy equipment, welders, turbine engine operators and others. 	
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		<p>5. Healthcare: Medical Check Up, POSYANDU (monthly basis), Disease Handling and Awareness.</p> <p>6. OHS Review: Monthly Safety Committee (P2K3) meeting</p> <p>Non conformity raised during audit:</p> <p>During field audit to tanjung Selamat POM it was notice that there is a maintenance and construction activity conducted by contractor, however there is no risk analysis conducted by company for those activities.</p>	
3.6.2	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.</p>	<p>H&S Plan addressing health and safety risk of people are monitored as below:</p> <ul style="list-style-type: none"> - PPE usage monitoring: PPE monitoring performed in daily basis by each department. PPE monitoring present in "Checklist Penggunaan APD". PPE monitoring period 2022 and 2023 can be demonstrated during audit. - OHS inspection conducted each month by OHS expert and team each month. OHS inspection covering: PPE usage inspection, unsafe action and unsafe condition in area of: Workshop, harvesting, spraying working, manuring, housing. OHS inspection schedule 2023 were sighted. - Safety committee meeting, conducted each month to review the effectiveness of OHS program and to discuss the OHS issue. Latest meeting conducted on 22 March 2023. Minutes of Safety committee meeting are available and reported in P2K3 report. <p>Effectiveness of OHS implementation was reported in P2K3 report which submitted to Manpower office "Disnakertrans Provinsi Sumatera Utara". Report submission receipt can be shown during audit. Sample seen report P2K3 period January – March 2023 reported on 22 May 2023 to Dinas tenaga Kerja Labuhan Batu and provinsi Sumatera Utara.</p>	Complied
<p>Criteria 3.7: All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.</p>			

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3.7.1	(C) A documented programme that provides training is in place, which is accessible to all staff, workers, scheme smallholders, and outgrowers taking into account gender- specific needs, and which covers applicable aspects of P&C Principles, in a form they understand and includes assessment of the training.	<p>The company has a department which is responsible for the training program, which is the Asian Agri Learning Institute. The department has a 2022/2023 training program recorded in the year 2022/2023 training calendar including Estate and Mill.</p> <p>Through its employee data (master of Employees) and training data personal records, the Asian Agri Learning Institute Department will recommend the Estate and Mill to participate in a training program annually and will also evaluate the effectiveness of the training that has been followed.</p> <p>The training program is divided into several aspects: technical, Administration, Environments & Sustainability and special certifications and there are also training involving vendors or operational suppliers.</p> <p>The following is a 2022/2023 period training program for PT ISJ and PT RSK, including:</p> <p><u>Technical (Estate):</u></p> <ol style="list-style-type: none"> 1. Refresh of SOP Handling of pests and diseases-Pengendalian hama dan Penyakit on February to March 2023, target of participants as much as 30 participants. 2. Spraying Training; will be held on March to May 2023, target of participants as much as 35 participants. <p><u>Vendor (Estate and Mill):</u></p> <ol style="list-style-type: none"> 1. Heavy equipment (Operational and Maintenance), will be held on March, July and August 2023, target of participants as much as 6 participants. <p><u>Technical (Mill and Workshop)</u></p> <ol style="list-style-type: none"> 1. Training on the principle in the operation of steam machine, will be held on July 2023 with target participants as much as 30 participants. 2. Road maintenance training, will be held on February, March and July 	Complied
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		<p>2023 with target of participants as much as 30 participants.</p> <p><u>Environmental & Sustainable:</u></p> <ol style="list-style-type: none"> 1. Sustainability awareness (include: traceability, mass balance and HCV), will be held on June 2023, target of participants as much as 50 participants. 2. Basic fire training will be held on February 2023, target of participants as much as 23 participants. 3. Fire equipment and service, will be held on February 2023, target of participants as much as 30 participants. 4. Training Core team, will be held on November 2023, target of participants as much as 300 participants. 5. Inspection and working environment observation, industry hygiene training, will be held on February 2023, target of participants as much as 23 participants. 6. Job safety analysis training, will be held on February 2023, target of participants as much as 23 participants. 7. Accidents investigation training, will be held on February 2023, target of participants as much as 23 participants. 8. Environmental awareness, will be held on May 2023, target of participants as much as 162 participants. <p><u>Certification:</u></p> <ol style="list-style-type: none"> 1. Certification of AK3U, will be held on June 2023 to 10 participants 2. Electricians' certification on March 2023 to 16 operators. 	
3.7.2	Records of training are maintained, where appropriate on an individual basis.	<p>The training realizes based on the Training calendar period 2022/2023, including:</p> <ol style="list-style-type: none"> 1. Training of refresh SOP for pest and disease control, implemented on March 30, 2023 and attended by 30 participants. 2. Technical road maintenance training, conducted on May 2023 and 	Complied

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		<p>attended by 25 participants.</p> <ol style="list-style-type: none"> 3. Basic Fire training, conducted on 28 February 2023 and attended by 31 participants. 4. Sustainability awareness, conducted on 21 March 2023 and attended by 50 participants. 5. Traceability training and book keeping for supply chains, conducted on 3 May 2023 and attended by 6 participants from Tanjung Selamat Mill. 6. Inspection and working environment observation, industry hygiene training, conducted on 28 February 2023, attend by 23 participants. 7. Job safety analysis training, conducted on 28 February 2023, attend by 23 participants. 8. Accidents investigation training, conducted on 28 February 2023, attend by 23 participants. 9. First aiders training, conducted on 30 March 2023 and attended by 25 participants (foreman) from Pangkatan Estate and Tanjung Selamat Mill and Estate. <p>The company has also made recording for all trainings that have been attended by employees in the recording of "Personal Data Training".</p> <p>Some documents can be shown at the time of the audit as proof is: the Calendar Training document period 2023, the list of participants attending the trainees, and some photographs of the activities at the time of training.</p>	
3.7.3	Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.	Training for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS) has been carried out by company on 3 May 2023, the training is carried out every year to refresh the member's knowledge.	Complied

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		Training attend by participants: Mill Manager, production clerk, weighbridge clerk, KTU/administration, Dispatch and Sustainability team. Evidence of training can be demonstrated (note of training, photo and attendance list). During ASA1_2, interview was carried out with mill personnel confirmed that they have understood regarding the RSPO SCCS implementation and process in Tanjung Selamat Palm Oil Mill.	
Criteria 3.8: Supply chain requirements for mills.			
Procedure note: all requirements are classified as Critical Indicators . However it will not contribute to suspension if there is more than 5 non-compliance within a principle)			
3.8.1	<p>Identity Preserved Module</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.</p> <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.</p>	<p>Based on document review and interview to the Mill Manager, it was known that Tanjung Selamat Palm Oil Mill physically receives and process FFB from certified and non-certified sources, therefore the applicable RSPO Supply Chain Module is CPO Mills: Mass Balance.</p> <p>Not Applicable.</p>	Not Applicable
3.8.2	<p>Mass Balance Module</p> <p>A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	<p>Tanjung Selamat Palm Oil Mill physically receives and process FFB from certified and non-certified sources, therefore the Tanjung Selamat Palm Oil Mill physically receives and process FFB from certified and non-certified sources, therefore the applicable RSPO Supply Chain Module is CPO Mills: Mass Balance.</p> <p>No change in the supply chain module since last assessment</p>	Complied
3.8.3	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure</p>	<p>During ASA1_2, it was known that PT ISJ – Tanjung Selamat POM is able to provide estimate volume of CPO and PK in a year period and it was recorded by the CB in Public Summary report and Certificate,</p>	Complied

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	represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.	consists estimate of FFB receiving from Tanjung Selamat Estate, Pangkatan estate and Third-Party supplier, extraction rates, processing capacity, working hour, utilization, etc. The actual tonnage produced are recorded in each annual surveillance report.	
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	PT ISJ – Tanjung Selamat POM is a palm oil mill which takes legal ownership and physically handled RSPO certified sustainable oil palm product, therefore the site has been registered in RSPO IT Platform with ID number RSPO_PO1000002607.	Complied
3.8.5	<p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ol style="list-style-type: none"> a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill’s procedures for the implementation of this standard. d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill. 	<p>PT Indo Sepadan Jaya – Tanjung Selamat POM can demonstrate:</p> <ol style="list-style-type: none"> 1. 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 Tanjung Selamat and Pangkatan Estate, processing up to shipping of CPO and PK as well as daily production report. The procedure also regulates the internal audit by Sustainability Internal Audit Manager. Traceability records are to be kept for 10 years. 2. Standard Operating Procedure – Book Keeping (AA-MPM-OP-1400.18- R4) dated 25 February 2015. The procedure explains method to check only certified product received. The bookkeeping mass balance issued 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. 3. SOP of Palm Oil Mill operation: <ol style="list-style-type: none"> a. SOP AA-MPM-OP-1400.02.R2, dated 1 September 2011, Stasiun Penerimaan (FFB Receiving Station) b. SOP AA-MPM-OP-1400.03.R1, dated 1 February 2009, Stasiun Rebusan (Sterilizer). 	Complied

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		<ul style="list-style-type: none"> c. SOP AA-MPM-OP-1400.04.R1, dated 1 February 2009, Stasiun Pemisahan Berondolan (Loose Fruit Separation) d. SOP AA-MPM-OP-1400.05-R1, dated 1 February 2009, Stasiun Pengadukan dan Pengempaan (Pressing Station) e. SOP AA-MPM-OP-1400.06-R1, dated 1 February 2009, Stasiun Pemurnian (Clarification) f. SOP AA-MPM-OP-1400.07-R1, dated 1 February 2009, Stasiun Pemisahan Nut dan Fiber (Nut and Fiber separation) g. SOP AA-MPM-OP-1400.08-R1, dated 1 February 2009, Stasiun Kernel (Kernel Station) h. SOP AA-MPM-OP-1400.09-R1, dated 1 February 2009, Stasiun Boiler i. SOP AA-MPM-OP-1400.10-R1, dated 1 February 2009, Stasiun Engine Room. j. SOP AA-MPM-OP-1400.11-R1, dated 1 February 2009, Stasiun Water Treatment. k. SOP AA-MPM-OP-1400.12-R1, dated 1 February 2009, Laboratorium. l. SOP AA-MPM-OP-1400.13-R1, dated 1 February 2009, Stasiun Pengelolaan Limbah (Palm Oil Mill Effluent Treatment). m. SOP AA-MPM-OP-1400.14-R2, dated 1 September 2011, Stasiun Penimbunan dan Pengiriman CPO dan Kernel (CPO and PK Storage and Despatch). n. SOP AA-MPM-OP-1400.15-R1, dated 1 February 2009, Perawatan (Preventive Maintenance and Repair). <p>There is no change about the SOP until ASA1_2.</p> <p>PT ISJ – Tanjung Selamat POM is able to demonstrate complete and up-to-date records and report demonstrating compliance with the supply</p>	
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		<p>chain's general requirement and modular requirement, including training records.</p> <p>As per Procedure of Traceability (AA-MPM-OP-1400.17-R7), the responsible person in charge (PIC) to the supply chain system is Mill Manager. During ASA1_2 audit, based on interview it was known that the mill manager was able to demonstrate sufficient knowledge and understanding on RSPO supply chain implementation for palm oil mill.</p> <p>The procedure SOP AA-MPM-OP-1400.02.R2, dated 1 September 2011, Stasiun Penerimaan (FFB Receiving Station) has include receiving of certified and non-certified FFB. The mill uses supply chain Model Mass Balance, contamination is allowed.</p>	
3.8.6	<p>Internal Audit</p> <p>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill;</p> <p style="padding-left: 20px;">a) Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p style="padding-left: 20px;">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>As per procedure of traceability (AA-MPM-OP-1400.17-R7) chapter 6.7, Sustainability Internal Audit Manager conducted internal audit 1 times in a year, to ensure all operational and documentation activities are comply to the requirement in RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>The site has effectively implemented and maintains the standard requirement by performing internal audit. Latest Internal audit carried out on 20-25 February 2023, against RSPO P&C Indonesia NI 2020 that include Supply Chain requirement.</p> <p>Internal audit report is available, described that there are no non-conformities found.</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 ISJ-Tanjung Selamat POM has demonstrated SOP of Traceability (AA-MPM-OP-1400.7.R6), chapter 5.1 indicates the Weighbridge Clerk has responsibility to input data and print weighbridge card based on "Surat Pengantar TBS", covering information e.g. estate name and block number, mill name, date of delivery, product description and quantity,</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>RSPO certificate number, transporter identity and unique identification number.</p> <p>PT ISJ – Tanjung Selamat POM receive FFB from certified and non-certified source. Certified source consists of own estate, Tanjung Selamat Estate and sister company estate (Pangkalan Estate - PT Rantau Sinar Karsa).</p> <p>Non-certified FFB sourced from third party supplier, e.g.: Roma, Palta Jaya UD Ula Tersia, UD Sahabat, William Tanizar and CSV (Create Share Value). Tonnage of certified and non-certified FFB are recorded in Laporan Harian Pabrik (Mill Daily Report).</p> <p>Standard Operating Procedure – Book Keeping (AA-MPM-OP-1400.18-R4) explains that Head of Environment and Sustainability will inform to Certification Body in the case of projected overproduction.</p> <p>In the case on non-conforming raw material entering the process, PT ISJ-Tanjung Selamat POM has the mechanism to handle non-conforming material and/or document. PT ISJ-Tanjung Selamat POM demonstrated the simulation on recall of non-conforming material.</p> <p>Record seen:</p> <p>FFB Certified</p> <ul style="list-style-type: none"> – Weighbridge Ticket No. PTSA123105088 dated 23/05/2023; from Tanjung Selamat Estate Div. 4; to PT Indo Sepadan Jaya – Tanjung Selamat Mill; Delivery date is 23/05/2023; Commodity is Certified FFB; Net weight 6,700 kg; Block D14d, D14c, D14b (492 bunches); certificate no. SPO620704; Transport Internal; Delivery Note KTSPM0120230523140303; Vehicle register No. BK 8067 ET; Driver Pasairul Fernando SI; Batch No. 13-DE100-16462019-24039545. – Weighbridge Ticket No. PTSA123105087 dated 23/05/2023; from Tanjung Selamat Estate Div. 1; to PT Indo Sepadan Jaya – Tanjung Selamat Mill; Delivery date is 23/05/2023; Commodity is Certified FFB; Net weight 6,280 kg; Block A17n A17o (660 bunches); 	
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		<p>certificate no. SPO620704; Transport Internal; Delivery Note KTSPM0520203523163506; Vehicle register No. BK 8068 ET; Driver Sahrul; Batch No. 13-DE100-16462019-24039543.</p> <ul style="list-style-type: none"> - Weighbridge Ticket No. PTSA423104776 dated 23/05/2023; from Pangkatan Estate Div. 2 to PT Indo Sepadan Jaya – Tanjung Selamat Mill; Delivery date is 23/05/2023; Commodity is Certified FFB; Net weight 6,820 kg; Block B18e B18f (786 bunches); certificate no. SPO620704; Transport Internal; Delivery Note KPTDT3520230523081801; Vehicle register No. BK 9698 YK; Driver Ahmad Saleh Giawa; Batch No. 13-DE100-16462019-23039399. - Weighbridge Ticket No. PTSA423104774 dated 23/05/2023; from Pangkatan Estate Div. 3 to PT Indo Sepadan Jaya – Tanjung Selamat Mill; Delivery date is 23/05/2023; Commodity is Certified FFB; Net weight 6,790 kg; Block C16g (536 bunches); certificate no. SPO620704; Transport Internal; Delivery Note KPTDT3520230523081832; Vehicle register No. BK 9832 YL; Driver Nelson Simbolon; Batch No. 13-DE100-16462019-23039394. - Weighbridge Ticket No. PTSA423104775 dated 23/05/2023; from Pangkatan Estate Div. 1 to PT Indo Sepadan Jaya – Tanjung Selamat Mill; Delivery date is 23/05/2023; Commodity is Certified FFB; Net weight 6,210 kg; Block A17b A19e A19f A19g (1,190 bunches); certificate no. SPO620704; Transport Internal; Delivery Note KPTDT5220230523082101; Vehicle register No. BK 8377 FF; Driver Arnol Sinaga; Batch No. 13-DE100-16462019-23039397. <p>FFB Non-Certified:</p> <ul style="list-style-type: none"> - Weighbridge Ticket No. PTSA523204959 dated 23/05/2023; from Supplier Wan Jumasari Dewi (WJD-KS) to PT Indo Sepadan Jaya – Tanjung Selamat Mill; Delivery date is 23/05/2023; Commodity is Outside FFB; Net weight 8,974 kg; total 561 bunches; Transport 	
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		<p>General; Delivery Note 024; Vehicle register No. BM 9314 PO; Driver Alang.</p> <ul style="list-style-type: none"> - Weighbridge Ticket No. PTSA523204957 dated 23/05/2023; from Supplier Wan Jumasari Dewi (WJD-KS) to PT Indo Sepadan Jaya – Tanjung Selamat Mill; Delivery date is 23/05/2023; Commodity is Outside FFB; Net weight 12,192 kg; total 762 bunches; Transport General; Delivery Note 022; Vehicle register No. BK 8001YN; Driver Torus. - Weighbridge Ticket No. PTSA523204955 dated 23/05/2023; from Supplier Palta Jaya to PT Indo Sepadan Jaya – Tanjung Selamat Mill; Delivery date is 23/05/2023; Commodity is Outside FFB; Net weight 840 kg; total 525 bunches; Transport General; Delivery Note 019; Vehicle register No. BK 8270FN; Driver Sabar. - Weighbridge Ticket No. PTSA522103202 dated 20/04/2022; from Supplier Wan Jumasari Dewi (WJD) to PT Indo Sepadan Jaya – Tanjung Selamat Mill; Delivery date is 20/04/2022; Commodity is Outside FFB; Net weight 13,728 kg; total 858 bunches; Transport General; Delivery Note 004; Vehicle register No. BK 9061 PO; Driver Sapri. 	
3.8.8	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ol style="list-style-type: none"> a) The name and address of the buyer; b) The name and address of the seller; c) The loading or shipment / delivery date; 	<p>PT ISJ-Tanjung Selamat POM has demonstrated SOP of Traceability (AA-MPM-OP-1400.17.R7), chapter 5.2 indicates the Marketing Manager issued Delivery Order (DO) with information: name and address of production unit, name and address of buyer, contract number, type of product transportation (land/sea), distance, type of product (CPO or PK, certified or non-certified), quantity of product, delivery date, product qualification specification (CPO or PK: FFA, water content, dirt, etc.), Supply chain model (Mass Balance).</p> <p>At the Mill, weighbridge operator printed out CPO or PK weighbridge card, based on DO from marketing which indicates type of commodity, CPO or PK certified or not-certified; source and destination address;</p>	Complied

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	<p>d) The date on which the documents were issued;</p> <p>e) RSPO certificate number;</p> <p>f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations);</p> <p>g) The quantity of the products delivered;</p> <p>h) Any related transport documentation;</p> <p>i) A unique identification number.</p>	<p>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); Buyer address.</p> <p>Sample of Sales Documents:</p> <p>i. Weighbridge ticket No. PTSC23200645; dated 13 May 2023; Seller PT Indo Sepadan Jaya – Tanjung Selamat POM; Buyer PT Sari Dumai Sejati; Commodity RSPO certified CPO; Supply Chain Model Mass Balance; Quantity 28,490 kg; FFA 3.37%; Moisture 0.20%; Dirt 0.025%; DO No. 05002/DC24/02/23; Supply chain certificate RSPO 620704.</p> <p>ii. Weighbridge ticket No. PTSC23200646; dated 13 May 2023; Seller PT Indo Sepadan Jaya – Tanjung Selamat POM; Buyer PT Sari Dumai Sejati; Commodity RSPO certified CPO; Supply Chain Model Mass Balance; Quantity 28,350 kg; FFA 3.41%; Moisture 0.23%; Dirt 0.025%; DO No. 05002/DC24/02/23; Supply chain certificate RSPO 620704.</p> <p>iii. Weighbridge ticket No. PTSC23200647; dated 13 May 2023; Seller PT Indo Sepadan Jaya – Tanjung Selamat POM; Buyer PT Sari Dumai Sejati; Commodity RSPO certified CPO; Supply Chain Model Mass Balance; Quantity 29,340 kg; FFA 3.33%; Moisture 0.21%; Dirt 0.024%; DO No. 05002/DC24/02/23; Supply chain certificate RSPO 620704.</p> <p>iv. Weighbridge ticket No. PTSC23200648; dated 13 May 2023; Seller PT Indo Sepadan Jaya – Tanjung Selamat POM; Buyer PT Sari Dumai Sejati; Commodity RSPO certified CPO; Supply Chain Model Mass Balance; Quantity 28,670 kg; FFA 3.33%; Moisture 0.23%; Dirt 0.023%; DO No. 05002/DC24/02/23; Supply chain certificate RSPO 620704.</p>	
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		<p>Based on sales document verified, information required are included, as follow:</p> <ul style="list-style-type: none"> a) The name and address of the buyer; b) The name and address of the seller; c) The loading or shipment / delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation; i) A unique identification number. 	
3.8.9	<p>Outsourcing Activities</p> <ul style="list-style-type: none"> 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. ii) The mill shall ensure the following: <ul style="list-style-type: none"> a) The mill has legal ownership of all input material to be included in outsourced processes 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>The mill does not outsource its milling activities.</p> <p>The transport for RSPO certified sustainable CPO and PK delivery was carried out by CV Jaya Pertama and CV Sejahtera Abadi Medan for certified CPO; and CV Sekawan Jaya for certified Palm Kernel. Contract documents were available. There is no change of the transporter until ASA1_2.</p> <p>During transport, the mill has legal ownership of the product delivered.</p> <p>The contract is as follow: "Perjanjian Pengangkutan" No. 04/VI/SA-ISJ/2020 dated 4 June 2020 between PT Indo Sepadan Jaya and CV Sejahtera Abadi regarding transport of CPO and PK. The contract is not stated validity of contract. Section 2 "Perjanjian Pengangkutan" conveyed that the term of the agreement is in accordance with the agreement of both parties.</p> <p>Based on the contract that stated in the article 7 (Responsibility and Obligation), point 1.m. stated that the contractor willing to meet the</p>	Complied

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	<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>requirements of the Supply Chain Certification System when transporting raw materials and be willing to be audited by a second party internal auditor and an external party auditor from the certification body appointed by the second party if necessary.</p> <p>The contract has been signed by both parties means that the outsourcing party understood the RSPO Supply Chain requirements.</p>	
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	<p>The mill has recorded the name and contact detail of all contractors, as follow:</p> <p>During transport, the mill has legal ownership of the product delivered. The contract is as follow: "Perjanjian Pengangkutan" No. 04/VI/SA-ISJ/2020 dated 4 June 2020 between PT Indo Sepadan Jaya and CV Sejahtera Abadi regarding transport of CPO and PK. The contract is not stated validity of contract. Section 2 "Perjanjian Pengangkutan" conveyed that the term of the agreement is in accordance with the agreement of both parties.</p>	Complied
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	Standard Operating Procedure – Book Keeping (AA-MPM-OP-1400.18-R4) revision dated 25 February 2015, Chapter 6.5, page 6, mentioned mechanism that Head of Environmental and Sustainability will inform to certification body if there is case of projected overproduction.	Complied
3.8.12	<p>Record keeping</p> <p>i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.</p> <p>ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.</p>	<p>Based on review of PT ISJ – Tanjung Selamat POM document and record during ASA1_2, the Mill is able to demonstrate complete, up-to-date and accessible records and reports covering all aspects of RSPO Supply Chain Certification Standard requirements.</p> <p>Records and report verified are as follows: Laporan Harian Pabrik (Mill Daily Report); dated 31/12/2022 and 30/04/2023.</p>	Complied

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	<p>iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p>iv) For Mass Balance Module, the mill:</p> <p>a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</p> <p>b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock).</p>	<p>Book Keeping – monthly mass balance record of FFB processed, CPO and PK production, CPO and PK deliveries for period March 2022 to January 2023.</p> <ul style="list-style-type: none"> • Kartu Timbangan (Weighbridge Card) FFB; • Kartu Timbangan (Weighbridge Card) CPO; • Kartu Timbangan (Weighbridge Card) PK; <p>The procedure of Traceability (AA-MPM-OP-1400.7.R6), requires that all records and reports related to traceability and book keeping are retained for a period of 10 years.</p> <p>Tanjung Selamat POM uses Mass Balance Module for supply chain. Tanjung Selamat POM has record and balances all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on monthly basis, as shown in Book Keeping Mass Balance Report. Monthly report was generated from weighbridge card, summarized daily in mill daily report, summarized monthly in Mill Operation Summary, then summarized in Book Keeping Mass Balance Report.</p> <p>Conversion rate is only applied to provide reliable estimation of CPO and PK produced for annual budget. All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system (Book Keeping Mass Balance Report).</p> <p>Tanjung Selamat POM only deliver certified CPO and PK sales from a positive stock. Audit team verified there was no short-selling and/or negative stock at the end of period.</p>	
3.8.13	<p>Extraction Rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate(KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own</p>	<p>The oil extraction rate (OER) and Kernel extraction Rate (KER) are applied to provide reliable estimation of CPO and PK produced for annual budget. OER and KER are set based upon past experience, documented and applied it consistently.</p>	Complied



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	extraction rates based upon past experience, documented and applied it consistently.	Based on "Distribusi Produksi Bulanan Anggaran 2023" budget for 2023 are as follows: - OER = 21.27% - KER = 4.35%																									
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	OER and KER are updated periodically to ensure accuracy against actual performance. Based on daily report dated 31 December 2022, actual OER and KER 2022 are as follows: - OER = 21.19% - KER = 4.12% Average OER since latest audit April 2022 – April 2023 was 20.81 % and KER was 4.09%.	Complied																								
3.8.15	Processing For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.	Tanjung Selamat POM implement Mass Balance Module. This indicator is not applicable.	Not Applicable																								
3.8.16	Registration of Transactions i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date. ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.	PT ISJ – Tanjung Selamat POM has made Shipping Announcement for certified CSPO and CSPK sold. Sampled of Shipping Announcement: <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Transaction ID</th> <th>Buyer</th> <th>Product</th> <th>Supply Chain Model</th> <th>Volume</th> <th>Status</th> </tr> </thead> <tbody> <tr> <td>TR-26c1a0f1-d8a0</td> <td>PT SDS</td> <td>CSPK</td> <td>MB</td> <td>778.94</td> <td>Confirmed</td> </tr> <tr> <td>TR-0aca599e-8d63</td> <td>PT SDS</td> <td>CSPO</td> <td>MB</td> <td>3,500</td> <td>Confirmed</td> </tr> <tr> <td>TR-5a18cc1c-a808</td> <td>PT SDS</td> <td>CSPO</td> <td>MB</td> <td>3,250</td> <td>Confirmed</td> </tr> </tbody> </table>	Transaction ID	Buyer	Product	Supply Chain Model	Volume	Status	TR-26c1a0f1-d8a0	PT SDS	CSPK	MB	778.94	Confirmed	TR-0aca599e-8d63	PT SDS	CSPO	MB	3,500	Confirmed	TR-5a18cc1c-a808	PT SDS	CSPO	MB	3,250	Confirmed	Complied
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		<table border="1"> <tbody> <tr> <td>TR-9d963b0a-7a1d</td> <td>PT SDS</td> <td>CSPO</td> <td>MB</td> <td>2,868.7</td> <td>Confirmed</td> </tr> <tr> <td>TR-05df3b29-3378</td> <td>PT SDS</td> <td>CSPO</td> <td>MB</td> <td>852.49</td> <td>Confirmed</td> </tr> <tr> <td>TR-76036332-eec4</td> <td>PT SDS</td> <td>CSPK</td> <td>MB</td> <td>800.99</td> <td>Confirmed</td> </tr> </tbody> </table> <p>Remove: Based on document review during ASA1_2, PT ISJ – Tanjung Selamat POM, during current licence period (Sept 2022 – Apr 2023) there is no "Remove" transaction in the RSPO IT Platform for certified product, due to all certified product has sold in RPSO scheme. There was CPO sold as ISCC certified in the previous licence in April 2022 as much as 695.71 MT, remove transaction has been made according to Transaction ID ST-TR-f9d256f8-4c31.</p>	TR-9d963b0a-7a1d	PT SDS	CSPO	MB	2,868.7	Confirmed	TR-05df3b29-3378	PT SDS	CSPO	MB	852.49	Confirmed	TR-76036332-eec4	PT SDS	CSPK	MB	800.99	Confirmed	
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3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	<p>The procedure for claims is stated in SOP for Traceability (AA-MPM-OP-1400.17-R7) dated 1 October 2019. The mill only makes claims on RSPO Certified product in compliance with RSPO Rules on Market Communications and Claims. Statement of RSPO certified and Mass Balance model are only stated in sales documents of RSPO certified product.</p> <p>There is no change related to the SOP.</p>	Complied																		
General corporate communications																					
4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	PT Indo Sepadan Jaya is a subsidiary of RSPO registered member PT Inti Indosawit Subur. The corporate communication of PT Inti Indosawit Subur can be seen in the company website, under brand Asian Agri at the address www.asianagri.com .	Complied																		
4.2	<p>In corporate communications a member is allowed to:</p> <ul style="list-style-type: none"> • Display its RSPO membership status • Display the RSPO web address (www.rspo.org) 	<p>Corporate communication in Asian Agri website:</p> <ul style="list-style-type: none"> • Display its RSPO membership status: On the website of Asian Agri, it was stated the company is RSPO Member since February 2006. 	Complied																		

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	<ul style="list-style-type: none"> State that the member supports the work of the RSPO State the member's history with regard to the RSPO. Use the RSPO trademark to promote its membership of the RSPO. <p>Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at www.rspo.org' where the link must lead to the member's profile page.</p>	<ul style="list-style-type: none"> Display the RSPO web address: Not in direct manner. In Asian Agri website, company made a link to RSPO website. State the member supports the work of the RSPO: Not in direct manner. In the website, Asian Agri wrote "In 2006, Asian Agri became a member of the Roundtable of Sustainable Palm Oil (RSPO), a global multi-stakeholder certification system to develop and implement global standards for sustainable palm oil production. We received our 1st RSPO certification for our estate in 2010, and in 2012, the certification for our smallholder scheme." State the member's history with regards to the RSPO: Yes. In the website of Asian Agri, it was stated the company is RSPO Member since February 2006. Use of RSPO Trademark to promote its membership of the RSPO: in the website, the company does not display RSPO Trademarks and corporate logo. <p>There is no change until ASA1_2.</p>	
4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	In the Asian Agri website, stated that the company is RSPO Member since February 2006. However, it is clear that the statement did not lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Not Applicable
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member's own products.	In the Asian Agri website, stated that the company is RSPO Member since February 2006. However, it is clear that the statement are clear and did not mislead consumers or other stakeholders as to the certified content of oil palm products in their own products.	Not Applicable
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	Asian Agri website did not display the RSPO Corporate Logo.	Complied
Business to business communications			

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5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	PT Indo Sepadan Jaya – Tanjung Selamat POM stated in sales documents, e.g., Weighbridge Ticket that the product they sold is RSPO Certified CPO or PK model MB.	Not Applicable
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	It was verified that when selling certified oil palm product, PT Indo Sepadan Jaya – Tanjung Selamat POM stated the supply chain model and certificate number, e.g., in Delivery Order and Weighbridge Card.	Complied
5.3	<p>Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options:</p> <p>a) If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer’s SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.</p> <p>b) If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p>	<p>PT Indo Sepadan Jaya – Tanjung Selamat POM is not a distributor or wholesaler, the site is a Palm Oil Mill that process FFFB into CPO and PK.</p> <p>Not applicable.</p>	Not Applicable
5.4	<p>A certified member can provide information to its customers detailing the presence of certified palm oil contained within a product even if it is not eligible for a product-specific under RSPO rules. The end product must not be labelled as certified or sold in such a way that implies RSPO certification.</p> <p>For example, a retailer or food service company may require a breakdown of all palm based ingredients within an end product and the certified status of each. This information may be provided by a certified RSPO member without constituting a product-specific claim.</p>	<p>PT Indo Sepadan Jaya – Tanjung Selamat POM is not a distributor or wholesaler, the site is a Palm Oil Mill that process FFFB into CPO and PK.</p> <p>Not applicable.</p>	Not Applicable

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MODULE B – MASS BALANCE SPECIFIC RULES			
Minimum Mass Balance content			
	95% or above of the oil palm content must be RSPO MB-certified.	PT Indo Sepadan Jaya – Tanjung Selamat Mill is producing and selling CSPO and CSPK; All CSPO/CSPK sold are 100 % content oil palm RSPO MB-certified.	Not Applicable
	Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.	There is percentage of non-certified oil palm within the product CSPO/CSPK. PT Indo Sepadan Jaya – Tanjung Selamat Mill does not produce end consumer goods. The production are CPO and PK.	Not Applicable
Labelling and trademark (MB)			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> • Surrounded by the text: 'Certified sustainable palm oil'. • The RSPO label MUST contain the tag 'MIXED'. The tag MIXED designates oil palm products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag 'MIXED' on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim. • The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'. • Wherever the RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4 pt (1.4 mm or 0.06 inch). • In on-pack communications, the RSPO trademark can be printed anywhere on the pack. Further guidance on use of the trademark is 	PT Indo Sepadan Jaya – Tanjung Selamat Mill was not use the RSPO label or logo.	Not Applicable

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	provided in the RSPO Trademark License Terms and Conditions and in Annex 1 of the Rules on Market Communications & Claims document.		
Messaging (MB)			
	<p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <ul style="list-style-type: none"> • [Oil palm products]/[palm oil]/[palm kernel oil] from RSPO-certified mills and plantations were mixed with non-certified oil palm products in the supply chain. • The volume of [oil palm products][palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations. <p>In off-product communications, reference to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown in company records is allowed.</p> <p>Messaging NOT ALLOWED in storytelling in product-related communications:</p> <ul style="list-style-type: none"> • Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product. 	PT Indo Sepadan Jaya – Tanjung Selamat Mill was not messaging in storytelling in product-related communications. It was verified during audit through sales contract, DO and dispatch slip (weighbridge card).	Not Applicable
Principle 4: Respect community and human rights and deliver benefit			
Respect community rights, provide equal opportunities, maximise benefits from engagement and ensure remediation where needed.			
Criteria 4.1: The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.			
4.1.1	(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, supply chain and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.	There are no changes related to the corporate policy that has been set on 1 December 2019 in Medan which has been ratified by the Managing Director (Kevin Tio). The policy relating to human rights, is explained in point 13, stating that: "The company respects human rights by treating all employees fairly, both in terms of acceptance, valuation, conditions and working environment, as well as representation regardless of tribe,	Complied

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		<p>caste, national origin, religion/belief, disability, gender, sexual orientation, membership of trade union political affiliation and/or age". Separately, the company has also a policy related a Human Rights Defender (HRD), 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 company's policy is also published to use posters at any strategic places in the plantations (Tanjung Selamat Estate, Pangkatan Estate and Tanjung Selamat Mill). Corporate policy has been socialized/ disseminate to all levels of PT ISJ and PT RSK employees on 7-9 February 2023 (list of participants can be shown) and on stakeholders (including local contractors) on 6-7 March 2023 which was attended by 17 stakeholders.</p> <p>Based on document review and interviews with several stakeholders (Chairman of PUK-SPPP-SPSI Workers Union, gender committee, Kampung Padang Village Head and Senah Village), within the past 3 years (until this surveillance audit was conducted) that there were no cases related to human rights violations occurred at PT ISJ and PT RSK.</p>	
4.1.2	The unit of certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations.	<p>In this audit, verification was carried out through interviews with stakeholders, management and workers (during the field visit: 5 harvesters, 5 spray workers) and document review, that they stated that there was no practices in the form of violence or using all forms of harassment, against workers and also including the use of mercenaries and paramilitaries in operations on the PT ISJ and PT RSK Plantation.</p> <p>There is no evidence that the company uses mercenaries and/or paramilitaries in its operational activities. Based on interviews with stakeholders (i.e. government agencies, village heads, workers & labor unions) as well as online searches it was revealed that the company does not incite violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations.</p>	Complied

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		<p>Based on an interview with management (KTU) at the Estate and Mill and also several PT ISJ and PT RSK employees/workers, that there were no mercenaries and paramilitary troops used in operations at PT ISJ and PT RSK.</p> <p>Based on interviews with the Chairperson of the Workers' Union Bpk. Henri Sinaga of PT RSK and Bpk. Josmar Tamba Labor union chairman of PT ISJ and the Gender Committee Ibu Romasi banjarnahor, that on 2022 - 2023 period there were no cases or work practices that contained violence or threats against workers.</p>	
Criteria 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.			
4.2.1	<p>(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p>	<p>Through the Public Relations department which is in charge of Mr. M. Bastari, The company has built a mechanism for handling complaints from external parties. This process also involves both internal and external stakeholders so that it can accommodate all parties. this procedure is recorded in "Complaint Handling Procedure, Document No. SOP AA-GL-5005-R0 01".</p> <p>Complaints from internal stakeholders are managed through "Mechanism for Submission of Complaints and Settlement of Employee Complaints, Document No.SOP.AA-HR-308 0.5-R0". The Company has also developed procedures to enforce whistle-blower confidentiality policies in the "Case Reporting and Disclosure Guarantee Mechanism" dated June 12, 2015. The purpose of SOP is to provide clear work guidelines to create consistency and be better, correct and timely. implementation in submitting and resolving employee complaints. Settlement of non-formal complaints, complaints can be submitted orally or directly to the superior, then the supervisor telephones the employee concerned no later than 2 days, the settlement of the complaint is made in writing. Complaint resolution is formal, the employee submits a complaint to the head of the department in writing, the head of the department summons the employee no later than 2</p>	Complied

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		<p>working days to resolve the employee's complaint. Employee complaints can also be resolved bipartitely.</p> <p>If there is harassment and violence, it will be reported to the Gender Committee. A documented procedure was created to handle cases of sexual harassment - SOP AA-HR-309.01-R0 dated February 1, 2009. The company has established a Gender Committee since April 2013 and consists of a chairman, vice chairman, secretary, deputy secretary, members. The activities of the Gender Committee include handling complaints from female workers, reporting and collecting data if cases of sexual harassment arise.</p>	
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.	<p>The available procedures are as 4.2.1.</p> <p>The Company consistently carries out procedures related to complaints and procedures related to violence against workers. This mechanism has been socialized to all workers on 7-8 September 2022 and to all stakeholder on 10-12 October 2022. In the 2023 period, PT ISJ and PT RSK has re-socialized related to internal and external complaint procedures on 10-12 October 2022</p> <p>During the site visit, an interview was conducted with 10 workers (guides and sprayers), that in general they had understood the processes in submitting complaints or complaints to management.</p> <p>In socializing this procedure, the company is directly explained to employees and when the employee joins the company, so that the procedure can be understood by all employees including employees who cannot read and write (illiterate). The management of PT RAU also provides an explanation of the process of submitting complaints and grievance complaints through pasting process flowcharts in afdeling offices with pictures that are easily understood by workers, especially those who cannot read and write.</p> <p>During the surveillance audit, several sample workers (5 harvester and 5 sprayer workers) were interviewed and in general they understood</p>	Complied

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		<p>enough about the complaint procedure. During the recruitment interview, they also explained the mechanism for submitting complaints and grievance, which could be through KTU/PR or through the unions. The company really understands the workers on the plantation where there are workers who still do not understand writing or reading, so it is considered very necessary to explain this to workers before joining as workers at PT ISJ and PT RSK.</p>	
4.2.3	<p>The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.</p>	<p>The company is consistent and in line with procedures/mechanisms related to external complaints, so the company always provides responses and holds meetings to discussions related to complaints submitted by stakeholders.</p> <p>Based on interviews with several stakeholders, it was found that there were several complaints from stakeholders, including:</p> <ol style="list-style-type: none"> 1. From the Plantation Service of Labuhan Batu Regency; related to the obligation to develop community gardens of 20% for Rank Estate (PT RSK) and Tanjung Selamat Estate (PT ISJ). <p>PT ISJ has collaborated with Tanjung Selamat Village to provide guidance for independent oil palm smallholders for a land area of 941.53 Ha. This collaboration was established based on the Cooperation Agreement between PT Indo Sepadan Jaya and Bumdes Tebing Tinggi Pangkatan Sejahtera No. 01/CSV-KTS/X/2019 dated 24 October 2019. Through this collaboration, the future PT ISJ will evaluate the Bumdes Tebing Tinggi Pangkatan Sejahtera which will later be continued to enter into a partnership agreement for the management of oil palm plantations in Tanjung Selamat Village.</p> <p>PT. Indo Sepadan Jaya (ISJ) signed a memorandum of understanding in partnership with the Sumber Rejeki Farmers Group Association (Gapoktan) at the Tanjung Selamat Factory Office, Kampung Padang Village, Pangkatan, Labuhanbatu, Medan</p>	Complied

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		<p>on 30 September 2016. The form of cooperation included counselling on cultivation techniques good palm oil, starting from the selection of superior seeds, planting, maintenance, to harvesting, even guaranteeing the purchase of Gapoktan's palm fruit bunches (FFB) by the company</p> <p>Asian Agri's partnership program with independent smallholders has been running since 2012 and continues to be ongoing.</p> <p>2. Complaints from Senah Village, independent oil palm farmers, related to permission to cross the PT SSR plantation area to transport FFB crops. Through Public Relations PT ISJ and RSK had a meeting with community leaders of Senah Village and the Head of Senah Village regarding the permit to enter PT RSK's plantation area by issuing a "Surat Perjanjian Perawatan Jalan Parimeter" containing an agreement, that:</p> <ul style="list-style-type: none"> - Maximum community FFB loading capacity of 5 tons. - Exit time limit from POS I (security) max. 18.00 WIB and additional time if community harvest conditions improve until 19.00 WIB - If the FFB load exceeds 5 tons, a penalty will be imposed and no longer allowed to cross the road (PT RSK area) to transport community FFB - The community is required to bring stones to petrun and file them in a designated place (in PT RSK's area). - PT RSK will assist with road repairs through the procurement of heavy equipment. <p>Through this agreement, the community can use this road to transport (independent oil palm farmers) their FFB harvests.</p> <p>Based on the complaint verification above, the companies (PT ISJ and PT RSK), have handled complaints according to established procedures.</p>	
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4.2.4	<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>Company has established a mechanism to handle complaint from external party, "<i>Mekanisme Penanganan Keluhan</i>" – complaint handling mechanism (Doc. No.SOP AA-GL- 5005-RO 01). These mechanisms have been communicated to external parties.</p> <p>In the event of a complaint that leads to a conflict with stakeholders, the company has also established Procedures related to Conflict Handling SOP No. AA-GL-5003.1-R1 dated August 22, 2011, explains that:</p> <p>Public Relations (<i>Humas: Hubungan Masyarakat</i>) receive conflict information (individuals, issues with surrounding communities, other representative institutions, media or newspapers), the company will analyses and mapping the problem through internal discussions (Estate manager, Managing Director, Regional Head and Stakeholder Relations), then companies through public relation will provide opportunities access to relevant interested parties (Local Government, Legal Apparatus or legal advisor) to obtain legal protection or independent technical assessments (Relevant agencies, for example: Plantation Service, National Land Agency-BPN). In this conflict resolution process, it is carried out through the FPIC process (making an agreement together with the conflicting party and or the institution) that represents it and if this does not meet an agreement, then litigation will be carried out or settlement through legal channels.</p> <p>Based on the complaint verification above indicator 4.2.3, the companies (PT ISJ and PT RSK), have handled complaints according to established procedures.</p> <p>Based on the verification of the above documents and interviews with the parties (stakeholders and respective KTU of PT ISJ and PT RSK) that the complaint handling resolution has been handled properly. In the complaint mentioned above, mediation has not yet been reached involving another party (third party) as arbitrator.</p>	Complied
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Criteria 4.3: The unit of certification contributes to local sustainable development as agreed by local communities.		
4.3.1	Contributions to community development that are based on the results of consultation with local community are demonstrated.	<p>PT ISJ and PT RSK has established a CSR (corporate social responsibility) program every year including in 2023 establishing a transparent CSR program discussed with village community representatives. In compiling the 2023 CSR program based on suggestions and requests from surrounding villages which were carried out in January 2023 during the Village Musreimbang (<i>Musyawah Perencanaan Pembangunan Desa - Village Development Planning Meeting</i>), the results of a survey conducted in February 2023, data collection and verification of the offering program as well as CSR budget capabilities. In compiling the 2022 CSR program, several stages of activity are carried out in the form of:</p> <ul style="list-style-type: none"> • Evaluation of CSR in 2022 • Identification of village CSR program needs in scope/ring 1 in 2023 • Village CSR Needs Verification Program scope/ring 1 of 2023 • Choice of CSR programs in 2023 • Preparation of the 2023 CSR budget <p>The program to improve the welfare of the surrounding community is included in the CSR program and involve community leaders and village heads around to formulate CSR programs on period 2022-2023. In 2023 the company has compiled 20 types of programs, including programs to improve the welfare of the surrounding community, for example:</p> <p>PT RSK:</p> <ol style="list-style-type: none"> 1. Social aspect: Assistance for the Dhuafa/Orphans in the form of Eid Packages/Christmas Packages/Holidays for the Fasting Month 2. Economic aspect: Development of MSME Pottery Crafts in Tanjung Harapan Village

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		<p>3. Educational Aspect: Furniture Assistance to SDN Alur Naga, Pangkatan Village</p> <p>4. Health Aspect: Prevention of Covid-19</p> <p>5. Infrastructure Aspect:</p> <ul style="list-style-type: none"> • Improvement of Transportation Facilities Repair of Tanjung Harapan Village road • Improvement of Social Facilities Renovation of Rank Health Centers • Improvement of Social Facilities Material Assistance 3 Houses of Worship <p>PT ISJ:</p> <p>1. Social Aspect:</p> <ul style="list-style-type: none"> - Assistance for the Dhuafa/Orphans in the form of Assistance for the Dhuafa Lebaran Package - Arts/ Culture/ Customs Traditional musical instrument assistance for Tanjung Selamat Village - Sports Activities Assistance with Sports Equipment (Badminton & Volley) <p>2. Educational Aspect: Furniture Assistance in the form of providing assistance to repair SDN 112238 Sepadan Jaya</p> <p>3. Health Aspect: General Treatment by Health Workers (Mobile Clinic), namely Free Medical Examination of Aek Nauli Hamlet/Covid 19</p> <p>4. Infrastructure Aspect:</p> <ul style="list-style-type: none"> - Repair of Social Facilities Material assistance for the Mosque of Worship House in Kampung Padang Village - Repair of Social Facilities Material assistance for the Kampung Padang Village Church House of Worship 	
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		<ul style="list-style-type: none"> - Repair of social facilities painting the Aek Nauli Hamlet Hall - Assistance with lighting lamps for Lestari Village <p>The realization of the CSR program for the 2023 period (until April 2023) is as follows:</p> <ol style="list-style-type: none"> 3. March 3, 2023; provided assistance for the construction and repair of roads in the Sidokuku Lestari Hamlet, Kampung Padang Village 4. On April 15, 2023 provided basic needs assistance in the form of rice (@5 kg) and 50 packages of syrup to the poor in Tanjung Harapan Village. <p>The Program Plan is recorded in the CSR Tracking 2022 - 2023 document, including:</p> <p>Create Share Value (CSV): the progress of CSV development up to 2021 - 2023 is the collaboration between PT ISJ and the Tebing Tinggi Consumer Cooperative of the Prosperous Group with 580 members of oil palm smallholders with an area of 1,320 Ha.</p> <p>Some of the CSR activities implemented for oil palm smallholders in the CSV program are as follows:</p> <ol style="list-style-type: none"> 1. Provide training and counseling to all Tebing Tinggi Consumer Cooperative farmers in March 2023, covering: weed control, fertilization, pest and plant disease control, soil and water conservation, harvest quality and resource development training in the form of group dynamics . 2. The road and bridge repair assistance program in the CSV area was carried out in April 2023 by providing road paving materials (split stones) and the use of heavy backhoe loader equipment. <p>Documentation of the realization of the CSR program can be shown at the time of the Audit in the form of the Asian Agri CSR Project Approval Sheet and Budget Details.</p>	
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Criteria 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.		
4.4.1	<p>(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed (FPIC) process. Documents related to the history of land tenure and the actual legal or customary use of the land are available.</p>	<p>There were no changes related to the land legality documents owned by PT ISJ and PT RSK, as follows:</p> <ol style="list-style-type: none"> 1. Decree of BPN Head No. 3/HGU/BPN.12/XII/2017 on 21 December 2017, related "Pemberian HGU atas nama PT Indo Sepadan Jaya atas tanah terletak di Kabupaten Labuhan Batu, Provinsi Sumatera Utara" - issuance of land use tittle (HGU) of PT Indo Sepadan Jaya, with area 123.915 Ha for Tanjung Selamat Estate, valid for 35 years, based on map no. 07/2016 dated 16 May 2016. 2. Decree of Menteri Agraria dan Tata Ruang/Kepala badan Pertanahan Nasional No. 20/HGU/KEM-ATR/BPN/III/2021 dated 25 March 2021 and Land Title Certificate No. 1394 year 2021 covering area 531.72 Ha for PT Indo Sepadan Jaya and valid until 25 March 2056. 3. Decree of Menteri Agraria dan Tata Ruang/Kepala badan Pertanahan Nasional No. 48/HGU/KEM-ATR/BPN/VIII/2021 dated 8 August 2021 and Land Title Certificate No. 1337 year 2021 covering area 3,347.01 Ha for PT Indo Sepadan Jaya and valid until 4 August 2056. 4. Decree of Menteri Agraria dan Tata Ruang/Kepala badan Pertanahan Nasional No. 5/HGU/BPN/90 dated 13 March 1990 and Land Title Certificate No. 3 year 1993 covering area 4,336 Ha for PT Rantau Sinar Karsa and valid until 31 December 2089 (for 75 years). <p>Renewal Hak Guna Usaha (HGU) from Kepala BPN no. 125/HGU/BPN/2004, concerning: Extension of Duration and Renewal of HGU on Land Located in Labuhan Batu Regency, North Sumatra Province (4,336 ha) with Land Certificate no. 3, year 1993 (Valid until 31 December 2080)</p>
		Complied

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		So that the total legal right used owned by PT ISJ and PT RSK is 8,338.645 Ha . However the area included in the certified area is 8,237.32 ha.	
4.4.2	<p>Copies documents evidencing agreement- making processes and negotiated agreements detailing the FPIC process are available and include:</p> <p>4.4.2a Evidence that a plan has been developed through consultation and discussion held in good faith with all affected groups within the community, with specific assurances that vulnerable, minority and gender groups are asked for their opinions, and that information has been provided to all affected groups, including in it information about the steps taken to involve them in decision making.</p>	Based on documents review and interview with local government and local communities surrounding the company, there is no change from the previous audit that it was noted no customary land or other legal rights within the company areas and in smallholder plantation. In addition, there is no land dispute between the company and communities surrounding their operational areas.	Complied
	4.4.2b Evidence that the unit of certification has respected communities to give or withhold their consent to the operations at the time that these decisions were taken;	Based on documents review and interview with local government and local communities surrounding the company, there is no change from the previous audit that it was noted no customary land or other legal rights within the company areas and in smallholder plantation. In addition, there is no land dispute between the company and communities surrounding their operational areas.	
	4.4.2c Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities. Including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land.	Based on documents review and interview with local government and local communities surrounding the company, there is no change from the previous audit that it was noted no customary land or other legal rights within the company areas and in smallholder plantation. In addition, there is no land dispute between the company and communities surrounding their operational areas.	
4.4.3	(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).	<p>In 2014, PT Indo Sepadan Jaya has a cadastral measurement that carried out by Badan Pertanahan Nasional of North Sumatera Region and recorded on the Peta Bidang Tanah/Land Area Map;</p> <p>a. Land Area Map No. 12/12/2014, scale 1:20.000; on August 2014, covering area 3,347.01 Ha, location at Labuhan Batu Regency on</p>	Complied

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		<p>the location permit No. 503.593/79/Ptnh/2014, dated 20 March 2014.</p> <p>b. Land Area Map No. 12A/12/2014, scale 1:10.000; on August 2014, covering area 531.72 Ha, location at Labuhan Batu Regency on the location permit No. 503.593/79/Ptnh/2014, dated 20 March 2014.</p> <p>c. Land Area Map No. 07/2016 dated 16 May 2016, scale 1:10.000; on August 2014, covering area 123.915 Ha, location at Labuhan Batu Regency on the location permit No. 503.593/79/Ptnh/2014, dated 20 March 2014.</p> <p>d. Land Area Map No. 154/1993 dated 5 January 1993, scale 1:50.000; on August 2014, covering area 4,336 Ha, location permit no. 593.41/2834/K year 1989 for PT Rantau Sinar Karsa.</p>	
4.4.4	All relevant information is available in appropriate forms and languages, including assessment of impact, proposed benefit sharing, and legal arrangements.	Based on public consultation with related stakeholder (government agencies of Labuhan Batu Regency and village representatives from Kampung Padang and Sennah) obtain information that there is no customary or indigenous people within the Tanjung Selamat Estate and Pangkatan Estate concession.	Complied
4.4.5	(C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.	Based on public consultation with related stakeholder (government agencies of Labuhan Batu Regency and village representatives from Kampung Padang and Sennah) obtain information that there is no customary or indigenous people within the Tanjung Selamat Estate and Pangkatan Estate concession.	Complied
4.4.6	There is evidence that implementation of agreement negotiated through FPIC is annually reviewed in consultation with affected parties.	Based on documents review and interview with local government and local communities surrounding the company, it was noted that no customary land or other legal rights within the company areas and in smallholder plantation. In addition, there is no land dispute between the company and communities surrounding their operational areas.	Complied

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Criteria 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.		
4.5.1	(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.	<p>Regarding the legality of land rights, in the 2022-2023 period there has been no change and all of them have been owned by PT ISJ and PT RSK in accordance with applicable laws and regulations. The following is a list of licenses owned by PT ISJ and PT RSK and have been verified at the time of the audit.</p> <p>PT Indo Sepadan Jaya</p> <p>Has obtained the legal ownership of land, history of land tenure ownership/control, and the actual legal use of the land:</p> <ol style="list-style-type: none"> 1. Izin Lokasi (Location Permit) from North Sumatera Governor no. 7550/Sekr/Tahun 1988 (\pm 3,885 Ha) and no. 593.41/2834/K, year 1989, dated 8 November 1989 (\pm 4,500 ha) for Tanjung Selamat Estate and no,593.41/2834/K, year 1989, dated 8 November 1989 (\pm 4,500 Ha) for Pangkatan Estate. 2. Izin Lokasi (Location permit): is based on Decree of Bupati Labuhanbatu Regency No. 503.593/35/Ptnh/2014, dated 14 February 2014, concerning Land Location Permit for the purpose of oil palm plantation business to PT Indo Sepadan Jaya located in Kampung Padang Village Pangkatan District, Labuhan Batu Regency with an area of \pm 118.4 HKeputusan Menteri Kehutanan on 1 October 1993, no. 578/Kpts-II/1993, related "Pelepasan Sebagian Kelompok Hutan S. Bilah – S. Kelundang" yang terletak di Kabupaten Labuhan Batu Propinsi Sumatera Utara seluas 3.475,6 Ha. 3. Izin Usaha Perkebunan (Operational Business Permit) from Agriculture Ministry No. HK.350/E4.242/03.89, dated 28th March 1989, renewal no. HK.350/M4.338/04.90, dated 10th April 1990 "Perubahan dan Perpanjangan Persetujuan Prinsip Usaha Perkebunan" become oil palm plantation as \pm 3,500 Ha in location

Complied

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		<p>Bilah Hilir Regency, District Labuhan Batu, Province Sumatera Utara" for Tanjung Selamat Estate and No. HK.350/ E4.236/03.89, dated 23 March 1989 and renewal IUP from rubber to oil palm plantation no. HK.350/E4.329/04/90 dated 10 April 1990 related renewal "Perubahan dan Perpanjangan Persetujuan Prinsip Usaha Perkebunan" becomes oil palm plantation as ± 3,150 Ha di Bilah Hilir Regency, District Labuhan Batu, Sumut" for Pangkatan estate.</p> <ol style="list-style-type: none"> 4. Renewal IUP in 2013 for Tanjung Selamat estate from Governor of North Sumatera no. 522.2/87/BPPTSU/ 2/1.3/IX/2013, dated 9th September 2013 for ± 3,885 Ha dan Mill capacity 45 tonnes FFB/hour. 5. IUP no. 522.2/186/BPPTSU/2/1.2/X/2015, dated 30th October 2015 regarding Izin Perluasan Usaha Perkebunan PT. Indo Sepadan Jaya for area 118.4 ha. 6. Decree of BPN Head No. 3/HGU/BPN.12/XII/2017 on 21 December 2017, related "Pemberian HGU atas nama PT Indo Sepadan Jaya atas tanah terletak di Kabupaten Labuhan Batu, Provinsi Sumatera Utara" - issuance of land use tittle (HGU) of PT Indo Sepadan Jaya, with area 123.915 Ha for Tanjung Selamat Estate, valid for 35 years, based on map no. 07/2016 dated 16 May 2016. 7. Decree of Menteri Agraria dan Tata Ruang/Kepala badan Pertanahan Nasional No. 20/HGU/KEM-ATR/BPN/III/2021 dated 25 March 2021 and Land Title Certificate No. 1394 year 2021 covering area 531.72 Ha for PT Indo Sepadan Jaya and valid until 25 March 2056. 8. Decree of Menteri Agraria dan Tata Ruang/Kepala badan Pertanahan Nasional No. 48/HGU/KEM-ATR/BPN/VIII/2021 dated 8 August 2021 and Land Title Certificate No. 1337 year 2021 covering area 3,347.01 Ha for PT Indo Sepadan Jaya and valid until 4 August 2056. 	
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		<p>PT Rantau Sinar Karsa:</p> <ol style="list-style-type: none"> 1. Hak Guna Usaha (HGU)/Land title based on SK BPN no. 5/HGU/BPN/90, dated 13 March 1990 (4,336 Ha) with land certificate no. 3, year 1993 for Pangkatan Estate. 2. Renewal Hak Guna Usaha (HGU) from Kepala BPN no. 125/HGU/BPN/2004, concerning: Extension of Duration and Renewal of HGU on Land Located in Labuhan Batu Regency, North Sumatra Province (4,336 ha) with Land Certificate (Sertifikat) no. 3, year 1993 (Valid until 31 December 2080) <p>Based on document verification, management unit has no land expansion since November 2005 and there was no customary land identified.</p>	
4.5.2	<p>(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions. All the relevant information and documents are made available, and community have option of resourced access to independent third-party advice through a documented, long-term and two- way process of consultation and negotiation.</p>	<p>Based on document verification, management unit has no land expansion since November 2005.</p> <p>Based on documents review and interview with local government and local communities surrounding the company, it was noted that all oil palm developments in PT Indo Sepadan Jaya and PT Rantau Sinar Karsa go through a comprehensive process, including in particular, full respect for their legal and customary rights to territories, lands and resources through the local community's own representative institutions. All relevant information and documents are available, and communities have the option of accessing resources for independent third party advice through a documented, long-term and two-way process of consultation and negotiation.</p>	Complied
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</p>	<p>Based on document verification, management unit has no land expansion since November 2005.</p> <p>Based on documents review and interview with local government and local communities surrounding the company, it was noted that affected local communities understand that they have the right to say 'agree' or 'disagree' to the planned operations on their lands before and during</p>	Complied



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	local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.	initial discussions, during the information gathering and related consultation stages, during negotiations, and until agreement with a unit of certification signed and endorsed by the local community. Negotiated agreements are non-coercive and voluntary and are entered into prior to new operations.	
4.5.4	To ensure local food and water security and as part of the FPIC process, SEIA participation and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of land allocations process.	Based on document verification, management unit has no land expansion since November 2005. Based on documents review and interview with local government and local communities surrounding the company, it was noted that companies - PT Indo Sepadan Jaya and PT Rantau Sinar Karsa have confirmed their needs for food and clean water. for long-term needs the company has also ensured that related to food security and water needs around the plantations and this is done through the FPIC process, SEIA participation and participatory land use planning with local communities, various food and air supply options are considered. There is transparency in the land allocation process. Transparency and as part of the FPIC process, SEIA participation and participatory land use planning with local communities, various food and air supply options were considered. There is transparency in the land allocation process.	Complied
4.5.5	Evidence is available that the affected communities and rights holders have had the option to access information and advice, that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.	Based on document verification, management unit has no land expansion since November 2005. Based on documents review and interview with local government and local communities surrounding the company, it was noted that affected communities and rights-holders have options to access information and advice, independent of the project proponent, regarding the legal, economic, environmental and social implications of the proposed operations on their lands. Procedures related to information and consultation have been established by the company, SOP No. AAGL-5008.1-R1: Handling of Requests for Stakeholder Information. This procedure was conveyed	Complied

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		again by Mr. Evi Sairi (Public Relations of PT ISJ and PT RSK) in January 2022 and was attended by 11 participants of stakeholders surrounding the plantation.	
4.5.6	Evidence is available that the communities or their representatives gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.	Based on document verification, management unit has no land expansion since November 2005. Based on documents review and interview with local government and local communities surrounding the company, it was noted that communities or their representatives provide approval for the initial planning stage of operations prior to the issuance of new concessions or land titles to operators.	Complied
4.5.7	After 15 November 2018, new lands will not be acquired for plantations and mills as a result of recent (after November 2005) expropriations in the national interest (eminent domain) without FPIC process, except in cases of smallholders benefitting from agrarian reform or anti-drug programmes.	Based on document verification, management unit has no land expansion since November 2005.	Complied
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation.	Based on document verification, management unit has no land expansion since November 2005.	Complied
Criteria 4.6: Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			
4.6.1	(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.	The Certificate Holder has had a procedure to resolve land conflict, Standard Operating Procedure (SOP) No.AA-GL-5003.1-R2 revision 2 dated 8 May 2015 regarding Land Conflict Handling. The SOP described flow process and mechanism to handle land conflict. The SOP has taking into consideration the FPIC guide for RSPO Member 2015, whereby in the SOP has regulate information land conveyance, negotiation, participatory land measurement and other activities including engagement with relevant parties and other parties neighboring the plantation and/or conflict land. Including, identifying whether customary, legal or other rights and its compensation calculation.	Complied

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		For smallholders, legal ownership is in the form of Land Certificate Ownership Right (Sertifikat Hak Milik). There is no issue related land dispute during 2022-2023 period related to the ownership land.	
4.6.2	(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.	<p>The Certificate Holder has had a procedure to resolve land conflict, Standard Operating Procedure (SOP) No.AA-GL-5003.1-R2 revision 2 dated 8 May 2015 regarding Land Conflict Handling. The SOP described flow process and mechanism to handle land conflict. The SOP has taking into consideration the FPIC guide for RSPO Member 2015, whereby in the SOP has regulate information land conveyance, negotiation, participatory land measurement and other activities including engagement with relevant parties and other parties neighboring the plantation and/or conflict land. Including, identifying whether customary, legal or other rights and its compensation calculation.</p> <p>For smallholders, legal ownership is in the form of Land Certificate Ownership Right (Sertifikat Hak Milik). There is no issue related land dispute during 2022-2023 period related to the ownership land.</p>	Complied
4.6.3	Evidence is available that equal opportunities are provided to both men and women to hold land titles for smallholdings (if possible based on local law, customs and/or agreement).	Based on documents review and interview with local government and local communities surrounding the company, it was noted the company has existed since 1980. There was no customary land or other legal rights within the company areas and in smallholder plantation. In addition, there is no land dispute between the company and communities surrounding their operational areas.	Complied
4.6.4	The process and outcomes of any negotiated agreements, compensation and payments are documented with evidence of the participation of affected parties and made available to them.	Based on documents review and interview with local government and local communities surrounding the company, it was noted the company has existed since 1980. There was no customary land or other legal rights within the company areas and in smallholder plantation. In addition, there is no land dispute between the company and communities surrounding their operational areas.	Complied

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Criteria 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.			
4.7.1	(C) A mutually agreed procedure for identifying people entitled to compensation is in place.	PT Based on documents review and interview with local government and local communities surrounding the company, it was noted the company has existed since 1980. No plantation expansion since existed in 1980. There was no customary land or other legal rights within the company areas and in smallholder plantation. In addition, there is no land dispute between the company and communities surrounding their operational areas. If there is a land dispute as described in indicator 4.2.1, the company will use the procedure as stipulated in the Standard Operating Procedure (SOP) document no. AA-GL-5003.1-R2 regarding Land Conflict Management which was approved by management on 08 May 2015.	Complied
4.7.2	(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.	PT Based on documents review and interview with local government and local communities surrounding the company, it was noted the company has existed since 1980. There was no customary land or other legal rights within the company areas and in smallholder plantation. In addition, there is no land dispute between the company and communities surrounding their operational areas. If there is a land dispute as described in indicator 4.2.1, the company will use the procedure as stipulated in the Standard Operating Procedure (SOP) document no. AA-GL-5003.1-R2 regarding Land Conflict Management which was approved by management on 08 May 2015.	Complied
4.7.3	Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.	PT Based on documents review and interview with local government and local communities surrounding the company, it was noted the company has existed since 1980. There was no customary land or other legal rights within the company areas and in smallholder plantation. In addition, there is no land dispute between the company and communities surrounding their operational areas.	Complied

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		If there is a land dispute as described in indicator 4.2.1, the company will use the procedure as stipulated in the Standard Operating Procedure (SOP) document no. AA-GL-5003.1-R2 regarding Land Conflict Management which was approved by management on 08 May 2015.	
Criteria 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrated that they have legal customary, or user rights.			
4.8.1	Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.	<p><u>Tanjung Selamat Estate:</u> Based on information management, verification of documents "Risalah Panitia B" No. 67/PPT/a/1989 dated 24 November 1989 by BPN Regional Office of North Sumatra province and Hectare Statement mentions an indication that there is no land dispute between the company and the community. On period 2022-2023 there is no dispute occurs at Tanjung Selamat Estate.</p> <p><u>Pangkalan Estate:</u> Related to the land conflicts: That HGU No. 3/Sennah whose rights will expire on December 31, 2020 based on the Decree of the Head of the National Land Agency No. 125 HGU/BPN/2004 dated October 28, 2004 regarding the granting of an extension of the term and renewal of HGU on land located in Kab. Labuhanbatu and has been registered for the extension of the HGU period ending on 31 December 2045 on a land area of 4,336 Ha as described in the measuring letter dated January 5, 1993 No. 151/1993. From this, there is a problem with the demands of 4 (four) farmer groups: Farmers and Fishermen Group, KT Bomban Seberang Seberang, KT Makmur Parduaan, and KT Dusun V, VI, VII for the land with an area of approximately 2,062.16 Ha which is located on the river border. Merbau Afdeling II (map attached).</p>	Complied

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		<p>At the time this surveillance audit was carried out and based on information as of 20 June 2022 that the land conflict issue still had no common ground between the two parties, so based on interviews with the Head of Sennah Village and Management of PT RSK, that the land in question was idle land and also outside HGU. Based on field monitoring, members of the Bilah Hilir Police were also present at the location of the land the residents wanted to own, accompanied by the Executor, (PJ) Head of Sennah Village, Amin Awaluddin. However, based on information from the Plantation Manager PT. RSK Rizal said that the land was a plantation forest conversion land and those who know more about this are the BPN Office of Labuhan Batu Regency.</p>	
4.8.2	<p>(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see 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><u>Tanjung Selamat Estate:</u> Based on information management, verification of documents "Risalah Panitia B" No. 67/PPT/a/1989 dated 24 November 1989 by BPN Regional Office of North Sumatra province and Hectare Statement mentions an indication that there is no land dispute between the company and the community. On period 2022-2023 there is no dispute occurs at Tanjung Selamat Estate.</p> <p><u>Pangkalan Estate:</u> Related to the land conflicts: That HGU No. 3/Sennah whose rights will expire on December 31, 2020 based on the Decree of the Head of the National Land Agency No. 125 HGU/BPN/2004 dated October 28, 2004 regarding the granting of an extension of the term and renewal of HGU on land located in Kab. Labuhanbatu and has been registered for the extension of the HGU period ending on December 31, 2045 on a land area of 4,336 Ha as described in the measuring letter dated January 5, 1993 No. 151/1993. From this, there is a problem with the demands of 4 (four) farmer</p>	Complied

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		<p>groups: Farmers and Fishermen Group, KT Bomban Seberang Seberang, KT Makmur Parduaan, and KT Dusun V, VI, VII for the land with an area of approximately 2,062.16 Ha which is located on the river border. Merbau Afdeling II (map attached).</p> <p>At the time this surveillance audit was carried out and based on information as of June 20 2022 that the land conflict issue still had no common ground between the two parties, so based on interviews with the Head of Sennah Village and Management of PT RSK, that the land in question was idle land and also outside HGU. Based on field monitoring, members of the Bilah Hilir Police were also present at the location of the land the residents wanted to own, accompanied by the Executor, (PJ) Head of Sennah Village, Amin Awaluddin. However, based on information from the Plantation Manager PT.RSK Rizal said that the land was a plantation forest conversion land and those who know more about this are the BPN Office of Labuhan Batu Regency.</p>	
4.8.3	<p>Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4).</p>	<p><u>Tanjung Selamat Estate:</u></p> <p>Based on information management, verification of documents "Risalah Panitia B" No. 67/PPT/a/1989 dated 24 November 1989 by BPN Regional Office of North Sumatra province and Hectare Statement mentions an indication that there is no land dispute between the company and the community.</p> <p>On period 2022-2023 there is no dispute occurs at Tanjung Selamat Estate.</p> <p><u>Pangkatan Estate:</u></p> <p>Related to the land conflicts:</p> <p>That HGU No. 3/Sennah whose rights will expire on December 31, 2020 based on the Decree of the Head of the National Land Agency No. 125</p>	Complied

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		<p>HGU/BPN/2004 dated October 28, 2004 regarding the granting of an extension of the term and renewal of HGU on land located in Kab. Labuhanbatu and has been registered for the extension of the HGU period ending on December 31, 2045 on a land area of 4,336 Ha as described in the measuring letter dated January 5, 1993 No. 151/1993. From this, there is a problem with the demands of 4 (four) farmer groups: Farmers and Fishermen Group, KT Bomban Seberang Seberang, KT Makmur Parduaan, and KT Dusun V, VI, VII for the land with an area of approximately 2,062.16 Ha which is located on the river border. Merbau Afdeling II (map attached).</p> <p>At the time this surveillance audit was carried out and based on information as of June 20 2022 that the land conflict issue still had no common ground between the two parties, so based on interviews with the Head of Sennah Village and Management of PT RSK, that the land in question was idle land and also outside HGU. Based on field monitoring, members of the Bilah Hilir Police were also present at the location of the land the residents wanted to own, accompanied by the Executor, (PJ) Head of Sennah Village, Amin Awaluddin. However, based on information from the Plantation Manager PT.RSK Rizal said that the land was a plantation forest conversion land and those who know more about this are the BPN Office of Labuhan Batu Regency.</p>	
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable).	Based on the results of the public consultation with the Head of Sennah Village in PT RSK on 19 February 2021 stated that there is a community claim on the area of HGU PT RSK. Refer to 4.8.3 above.	Complied
<p>Principle 5: Support smallholder inclusion Include smallholders in RSPO supply chains and improve their livelihoods through fair and transparent partnerships.</p>			
<p>Criteria 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.</p>			



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5.1.1	Current and previous period prices for FFB are publicly available and accessible by smallholders.	<p>During ASA1_2, it was known that the company has displayed the FFB price in Mill's notice board in front of the weighbridge station, all FFB suppliers can see it and able to access the FFB price by phone.</p> <p>The company cooperates with the surrounding community in terms of purchasing FFB and recorded in "<i>Pernyataan dan Jaminan</i>" - Statement and Guarantee as a supplier of FFB. The document stated that:</p> <ol style="list-style-type: none"> 1. FFB that supplied to Tanjung Selamat POM came from land that has been owned/controlled/cultivated in accordance with the legislation, especially in the field of land and plantation. 2. FFB supplied does not originate from unauthorized areas, such as: <ol style="list-style-type: none"> a. Protected Forest Area b. Industrial Forest Area c. Production Forest Area d. Conservation area <p>The implementation of FFB pricing for the period of April 2023 was verified with the records and based on these records that the pricing of FFB was in accordance with procedures and applicable regulations as well, it was transparently informed to all independent smallholders.</p>	Complied
5.1.2	(C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.	Based on interview with management representative i.e., public affair staff, sustainability and plasma manager obtained information that the actual prices informed directly to the CSV supplier. The company has displayed the FFB price in Mill's notice board in front of the weighbridge station, all FFB suppliers can see it and able to access the FFB price by phone. The FFB prices information also informed and explain by phone and direct message to all FFB supplier by Mill Manager. There is no dispute related to FFB payments so far.	Complied
5.1.3	(C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.	Based on interview with management representative during ASA1_2 i.e. public affair staff, sustainability and plasma manager obtained	Complied

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		<p>information that the actual prices informed directly to the CSV supplier. The actual prices also informed in front of mill gate. There is no dispute related to FFB payments so far.</p> <p>There is no RSPO certified smallholder engage with Tanjung Selamat POM so far.</p>	
5.1.4	<p>(C) Evidences is available that all parties, including women and independent representative organization assisting smallholders where requested, are involved in the decision making processes and understand the contracts. These include involving finance, loans/credits, and repayments through FFB price reductions for replanting and/or, other support mechanisms where applicable.</p>	<p>There is no RSPO certified smallholder engage with Tanjung Selamat POM so far.</p>	Complied
5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe.</p>	<p>There is an agreement in buying and selling FFB between Asosiasi WJD and PT Indo Sepadan Jaya, contract number: 05/CSV-KTS/X/2019 dated 24 October 2019 and this agreement is ended until one of the parties terminates the agreement, explained in Article 12, Regarding Term: <i>"Perjanjian ini akan berlangsung sejak ditandatangani dan tetap mengikat para pihak sepanjang tidak diakhiri oleh para pihak"</i>.</p> <p>The agreement/contract documents between the company and the contractor is sighted such as for replanting. The contract was acknowledged by both parties and well understood. The contract contained all relevant information such as payment method, work requirements, force majeure, contract period, cancellation of contract, etc. These contract documents are jointly signed and made in duplicate and held by each party (company and supplier).</p> <p>Regarding FFB pricing, the contract is stated in Article 7; Price of FFB, states: <i>"Harga pembelian TBS dari kebun pihak kedua mengacu pada harga yang berlaku pada saat penjualan TBS kepada pihak pertama. Penetapan harga TBS oleh pihak pertama berdasarkan harga pasar dan harga TBS luar"</i>. Price changes will be informed one day before the changes, and it applicable for large size FFB (more than 8 kg).</p>	Complied

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		<p>Mechanism for FFB price has been known, understood and explained to FFB suppliers</p> <p>Transparently, this agreement was made and witnessed by several stakeholders, including: Tebing Tinggi Pangkat Village Head and Labuhan Batu Office Head and 4 other witnesses consisting of (internal company and local communities). In the contract, it was affirmed related to the legality in Article 6: Rights and obligations of the Second Party, stated: <i>"Pemegang perjanjian ini harus memiliki segala bentuk perizinan yang diperlukan, baik dalam pengelolaan perkebunan kelapa sawit maupun dalam hal pelaksanaan perjanjian ini"</i>.</p>	
5.1.6	(C) Agreed payments are made in a timely manner and receipts specifying price, weigh, deductions and amount paid are given.	<p>Agreed payments are made in a timely manner and receipts specifying. The agreement/contract documents between the company and the contractor is sighted such as for replanting. The contract was acknowledged by both parties and well understood. The contract contained all relevant information such as payment method, work requirements, force majeure, contract period, cancellation of contract, etc.</p> <p>Regarding FFB pricing, the contract is stated in Article 7; Price of FFB, states: <i>"Harga pembelian TBS dari kebun pihak kedua mengacu pad harga yang berlaku pada saat penjualan TBS kepada pihak pertama. Penetapan harga TBS oleh pihak pertama berdasarkan harga pasar dan harga TBS luar"</i>. Price changes will be informed one day before the changes, and it applicable for large size FFB (more than 8 kg). Mechanism for FFB price has been known, understood and explained to FFB suppliers.</p> <p>Regarding payments for FFB purchased, this is explained in the Cooperation Agreement document in Article 9; regarding FFB payments, stated:</p> <p>a. Payment of the price of second party FFB, will be made after accounting for the obligations of the second party installment to</p>	Complied

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		<p>the first party based on this agreement.</p> <p>b. Payment as referred to in paragraph 1 (above) will be made by the first party to the second party within a period of no later than 30 (thirty) working days, after receipt of evidence and supporting documents submitted by the supplier or second party are fully received by the first party.</p> <p>The FFB payment document can be shown at the time of the audit of ASA1_2, namely: weigh ticket, FFB payment slip (including weight vehicle number, FFB net weight, FFB price for the period, tax payment etc.).</p>	
5.1.7	Weighing equipment is verified by an independent third party on a regular basis.	<p>Calibration of the FFB weigh bridge has been carried out by <i>Balai Standardisasi Metrologi Legal Regional I Dirjen Perlindungan Konsumen dan Tertib Niaga Direktorat Metrologi Labuhan Batu</i> on 8 September 2022 and recorded of Test Result Statement No. 004/PKTN.4.9/KHP/09/2022 for UTTP types: Bridge Scales, Trademark: Avery Weigh-Tronix; ZMS10; 190250016 with a capacity of 50,000 kg / 10 kg (valid until 1 year).</p> <p>This calibration is carried out at least once a year and regularly PT Indo Sepadan Jaya always calibrate the weigh bridge.</p>	Complied
5.1.8	The unit of certification supports Independent smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholder on who runs the Internal Controlling System (ICS), who holds the certificate, and who owns and sells certified materials.	There is no independent smallholder or any RSPO certified smallholder engage with Tanjung Selamat POM so far.	Complied
5.1.9	(C) The unit of certification has a grievance mechanism for smallholders, and all grievances raised are dealt with in a timely manner.	Company has established a mechanism to handle complaint from external party, as written in "Mekanisme Penanganan Keluhan" – complaint handling mechanism (Doc. No.SOP AA-GL- 5005-RO 01) while complaint from internal regulated under "Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan" – Employee' complaint	Complied

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		<p>and resolution mechanism (Doc. No.SOP-AA-HR-3008-RO 05). These mechanisms have been communicated to external parties and disseminated to PT Indo Sempadan Jaya employees. There is no change about the SOP until ASA1_2.</p> <p>The procedure is how to handle complaint and grievances, the company keeps confidential complainer and whistleblower. Complaint and grievance is recorded in log Book and in "Formulir Pencatatan Keluh Kesah dan Ketidakpuasan".</p> <p>Based on Buku Agenda Komplain, that there is no complaint from stakeholders during period Y2022/2023.</p>																		
Criteria 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.																				
5.2.1	The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification.	<p>Until this ASA1_2 audit, PT ISJ has 7 smallholders who work together and are members of the CSV (Create Share Value) Program as follows:</p> <table border="1" data-bbox="1137 882 1890 1230"> <thead> <tr> <th>Estate</th> <th>Farmer Group</th> <th>Area (Ha)</th> </tr> </thead> <tbody> <tr> <td rowspan="5">Tanjung Selamat</td> <td>Anugrah Jaya Mandiri Sejahtera</td> <td>464</td> </tr> <tr> <td>Koperasi Mandiri Tani Sejahtera</td> <td>357</td> </tr> <tr> <td>BUMDES Sejahtera</td> <td>941</td> </tr> <tr> <td>Asosiasi WJD</td> <td>1,714</td> </tr> <tr> <td>Asosiasi KS</td> <td>1,219</td> </tr> <tr> <td>Total</td> <td></td> <td>4,695</td> </tr> </tbody> </table> <p><i>Note: update January 2023</i></p> <p>The company has established a CSV coaching program for the 2022/2023 period. The realization CSV Program for period Y2022, as follow:</p>	Estate	Farmer Group	Area (Ha)	Tanjung Selamat	Anugrah Jaya Mandiri Sejahtera	464	Koperasi Mandiri Tani Sejahtera	357	BUMDES Sejahtera	941	Asosiasi WJD	1,714	Asosiasi KS	1,219	Total		4,695	Complied
Estate	Farmer Group	Area (Ha)																		
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Total		4,695																		

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		<ul style="list-style-type: none"> - Fertilizer Training, carried out in January 2023. - Pest and Diseases Training, carried out in January 2023. - Harvesting and PPE, carried out in January 2023. - Riparian Buffer Zone, carried out in January 2023. <p>Based on an interview with the CSV person in charge (Mr. Hendra Jaminsa) consultation with farmers was carried out in March 2023 which was attended by 44 farmers and farmer group leaders, that there are several expectations from farmers, including:</p> <ul style="list-style-type: none"> - Relatively stable FFB price - BMP coaching assistance in increasing production. - Assistance in maintaining production road access to the factory for smooth delivery of FFB to the mill. <p>Some of the farmers' hopes have been realized by PT ISJ for Y2023, including:</p> <ul style="list-style-type: none"> - Assistance of the office stationery. - Maintenance of the transport road. - Assistance of the owl cage 6 units @ IDR 1,300,000. - Install of the sign board related to the importance of PPE, fire, Best Management Practices. - Training related to the fertilizer, harvesting, and certification process. <p>In supporting the legality of smallholder land, PT ISJ has provided assistance in efforts to process the legality of farmers' land to obtain a Certificate of Ownership (SHM), until December 2022 the certificates of SHM that have been owned by farmers are as follows:</p> <ul style="list-style-type: none"> - Owned SHM: 456 Ha - Have Village Letter: 3,413 Ha 	
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		<ul style="list-style-type: none"> - No data yet: 107 Ha. 	
5.2.2	<p>The unit of certification develops and implements livelihood improvement programmes, including at least capacity building to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder).</p>	<p>Based on document review and interview with CSV Department during ASA1.2, it was known that PT Indo Sepadan Jaya has collaborated with smallholders around plantations and is incorporated in the CSV (Create Share Value) Program, namely: village with a total of 13 farmer groups. In 2021 there is a program to increase the area of CSV area of 140 Ha located in SP4 and SP6.</p> <p>The Company has settled the CSV development program for the period 2022, the realization of the program until December 2022 is as follows:</p> <ul style="list-style-type: none"> - Monitoring of harvest rotation. - Create pilot areas with good production categories, there are 10 plots as pilot areas with total areas 215 Ha. - Assistance of fertilizer procurement for CSV area. - Monitoring of owl cages, actual until December 2022 is 19 units owl cages. - Farmer Training in Certification Preparation was carried out on 12 December 2022, training material including Best Management Practices. - Mapping of smallholder area, until December 2022 have been realized 464 Ha. <p>In supporting the legality of smallholder land, PT IIS has provided assistance in the effort to process the legality of farmers' land to obtain a Freehold Certificate (SHM), until December 2022 the SHM certificates that have been owned by farmers are as follows:</p> <ul style="list-style-type: none"> - Already have Certificate of SHM (Sertifikat Hak Milik): 125 Ha. - Has a Village Letter (SKT/SKGR): 782 Ha 	Complied

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5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	<p>Based on document review and interview with CSV Department during ASA1.2, it was known that PT ISJ has 7 smallholders who work together and are members of the CSV (Create Share Value) Program as follows:</p> <table border="1" data-bbox="1137 475 1854 858"> <thead> <tr> <th>Estate</th> <th>Farmer Group</th> <th>Area (Ha)</th> </tr> </thead> <tbody> <tr> <td rowspan="5">Tanjung Selamat</td> <td>Gapoktan Sumber Rezeki</td> <td>364</td> </tr> <tr> <td>Koperasi andiri Tani Sejahtera</td> <td>357</td> </tr> <tr> <td>BUMDES Sejahtera</td> <td>941</td> </tr> <tr> <td>Asosiasi WJD</td> <td>1.714</td> </tr> <tr> <td>Asosiasi KS</td> <td>600</td> </tr> <tr> <td>Total</td> <td></td> <td>3,976</td> </tr> </tbody> </table> <p>The Company has settled the CSV development program for the period 2022, the realization of the program until December 2022 is as follows:</p> <ul style="list-style-type: none"> - Monitoring of harvest rotation. - Create pilot areas with good production categories, there are 10 plots as pilot areas with total areas 215 Ha. - Assistance of fertilizer procurement for CSV area. - Monitoring of owl cages, actual until December 2022 is 19 units owl cages. - Farmer Training in Certification Preparation was carried out on 12 December 2022, training material including Best Management Practices. - Mapping of smallholder area, until December 2022 have been realized 464 Ha. 	Estate	Farmer Group	Area (Ha)	Tanjung Selamat	Gapoktan Sumber Rezeki	364	Koperasi andiri Tani Sejahtera	357	BUMDES Sejahtera	941	Asosiasi WJD	1.714	Asosiasi KS	600	Total		3,976	Complied
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		<p>Based on an interview with the CSV person in charge (Mr. Hendra Jaminsa) consultation with farmers was carried out in March 2023 which was attended by 44 farmers and farmer group leaders, that there are several expectations from farmers, including:</p> <ul style="list-style-type: none"> - Relatively stable FFB price - BMP coaching assistance in increasing production. - Assistance in maintaining production road access to the factory for smooth delivery of FFB to the mill. <p>Some of the farmers' hopes have been realized by PT ISJ for Y2023, including:</p> <ul style="list-style-type: none"> - Assistance of the office stationery. - Maintenance of the transport road. - Assistance of the owl cage 6 units @ IDR 1,300,000. - Install of the sign board related to the importance of PPE, fire, Best Management Practices. - Training related to the fertilizer, harvesting, and certification process. <p>The Company has settled the CSV development program for the period 2022, the realization of the program until December 2022 is as follows:</p> <ul style="list-style-type: none"> - Monitoring of harvest rotation. - Create pilot areas with good production categories, there are 10 plots as pilot areas with total areas 215 Ha. - Assistance of fertilizer procurement for CSV area. - Monitoring of owl cages, actual until December 2022 is 19 units owl cages. - Farmer Training in Certification Preparation was carried out on 12 December 2022, training material including Best Management Practices. 	
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		<ul style="list-style-type: none"> - Mapping of smallholder area, until December 2022 have been realized 464 Ha. <p>In supporting the legality of smallholder land, PT IIS has provided assistance in the effort to process the legality of farmers' land to obtain a Freehold Certificate (SHM), until December 2022 the SHM certificates that have been owned by farmers are as follows:</p> <ul style="list-style-type: none"> - Already have Certificate of SHM (Sertifikat Hak Milik): 125 Ha. - Has a Village Letter (SKT/SKGR): 782 Ha 	
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	The PT ISJ CSV team has provided guidance to smallholder farmers by conducting several training activities, including pesticides handling that was carried out on 12 December 2022. Training including fertilizer, pest and disease, weed control and OHS.	Complied
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	<p>The CSV Program Achievement Report up to December 2022 has been reported in the Tanjung Selamat plantation annual report and the report has been reviewed in January 2023 which will then be used as a CSV program in 2023. This report can be access by public.</p> <p>Based on the results of the 2022 CSV report review, the results are as follows:</p> <ul style="list-style-type: none"> - Based on the progress report on the achievement of the CSV program for the 2022 period, the area of the CSV program has reached 3,976 hectares, there is no changes of areas. - Road maintenance will be improved for period Y2023. - Procurement of fertilizer will be continued. 	Complied

Principle 6: respect workers' rights and conditions

Protect workers' rights and ensure safe and decent working conditions.

Criteria 6.1: Any form of discrimination is prohibited.

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6.1.1	<p>(C) A publicity available non-discrimination and equal opportunity policy is implemented in such way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.</p>	<p>Equal Opportunity policy is stated in "Kebijakan Perusahaan", updated 01st December 2019. Stated in Point 13 "<i>Menghormati hak asasi manusia dengan memperlakukan seluruh karyawan secara adil, baik dalam hal penerimaan, penilaian, kondisi dan lingkungan kerja, serta keterwakilan tanpa memandang suku, kasta, asal negara, agama/kepercayaan, cacat, gender, orientasi seksual, keanggotaan serikat pekerja, afiliasi politik dan/atau umur</i>" - Respect human rights by treating all employees fairly, both in terms of acceptance, assessment, working conditions and environment, and representation regardless of ethnicity, caste, national origin, religion/belief, disability, gender, sexual orientation, union membership, affiliation politics and/or age.</p> <p>This policy has been informed to all employees (lates socializarion on 13 January 2023) and being placed into noticed board in public area and easily accessed.</p> <p>Company also has SOP about the new employment recruitment. According on SOP: AA-HR-305.2-R0 dated 1 February 2009 about "Penerimaan Karyawan Baru" (Recruitment and Selection of Employee), the company will accept new employee based on their capabilities and qualifications. This policy has been communicated to worker. The policy describe the organization recognize and respect to the rights of local, migrant or urban worker.</p> <p>Worker register for mill and estates mentioned that all workers came from different backgrounds (race, religion, gender, etc). Ethnical diversity of worker and during interview with workers, no discrimination was identified based on religion, ethnic, gender. No evidence of discrimination found during the audit. Company provided working tools to the workers, relevant to the nature of the work performed.</p> <p>According to data of employees distribution, employee composition is consists of several religions, ethnicities and races. During interview with workers and labor union on 25/05/2023 confirmed that there is no</p>	Complied
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		<p>discrimination issue occur.</p> <p>This employee list proves that the company does not practice any form of discrimination, employees are given the opportunity to work regardless of ethnicity, religion, origin, and gender.</p>	
6.1.2	<p>(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against. Evidence includes migrant workers non-payment of recruitment fees.</p>	<p>Worker register for mill and estates mentioned that all workers came from different backgrounds (race, religion, gender, etc). Ethnical diversity of worker and during interview with workers, no discrimination was identified based on religion, ethnic, gender. No evidence of discrimination found during the audit.</p> <p>Company provided working tools to the workers, relevant to the nature of the work performed.</p> <p>During interview with workers and Labor union on 25/05/2023 confirmed that there is no discrimination occurs in PT Indo Sepadan Jaya and PT Rantau Sinar Karsa.</p>	Complied
6.1.3	<p>The unit of certification demonstrates that the recruitment selection, hiring access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p>	<p>Company has a SOP related to new employment recruitment. According on SOP Rekrutment dan Seleksi Karyawan No. SOP: AA-HR-305.2-R0 dated 1 February 2009 regarding "<i>Penerimaan Karyawan Baru</i>" (Reqrutment and Selection of Employee), the company will accept new employee based on their capabilities and qualifications. This procedure ware communicated to all employees in the workplace and stakeholders as well on 13 January 2023.</p> <p>There are two types of employees that are applied in PT ISJ and PT RSK, which are permanent employees (known as SKU-B and SKU-H) and daily workers (known as BHL/PHL). Worker register for mill and estates mentioned that all workers came from different backgrounds (race, religion, gender, etc). Ethnical diversity of worker and during interview with workers, no discrimination was identified based on religion, ethnic, gender. No evidence of discrimination found during the audit.</p> <p>Permanent Employee (SKU-H and SKU-B) is confirmed under the joint</p>	Complied

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		<p>work Agreement (PKB), while the Daily worker with the daily work agreement with a minimum validity period of 1 year.</p> <p>Based on interview with the HR Dept., that recruitment of employees is based on an analysis of workforce needs and within it has considered, the required competencies, experience and expertise required. For this reason, employee acceptance tests and interviews will be conducted. Employee assessments are always carried out every 6 months as a basis for being able to promote positions or levels/groups which will affect to the monthly salary.</p> <p>Sample taken for recruitment process/promotion process at Tanjung Selamat Mill on period 2023 and promotion of permanent employee of Tanjung Selamat Estate:</p> <ol style="list-style-type: none"> 1. Employee promotion, based on Internal Memorandum of HR Ops. Plantation 1 No. 107/HR-RO1/MEMO/1/2023 dated 27 December 2022, on behalf of Ridwan Zalukhu, promote to starts from 1 January 2023. 2. Employee promotion, based on Internal Memorandum of HR Ops. Plantation 1 No. 108/HR-RO1/MEMO/1/2023 dated 27 December 2022, on behalf of Sipendi Zalukhu, promote to starts from 1 January 2023. 3. Employee promotion, based on Internal Memorandum of HR Ops. Plantation 1 No. 109/HR-RO1/MEMO/1/2023 dated 27 December 2022, on behalf of Agustino Gulo, promote to starts from 1 January 2023. 4. Employee promotion, based on Internal Memorandum of HR Ops. Plantation 1 No. 110/HR-RO1/MEMO/1/2023 dated 27 December 2022, on behalf of Arman Waruwu, promote to starts from 1 January 2023. 	
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6.1.4	Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.	<p>As it is found in company policy that's signed by Managing Director (Mr. Kelvin Tio) on 1st December 2019 at point 15 of the policies stated that: "prevent sexual harassment and various forms of violence against women and protect their reproductive rights".</p> <p>There is a gender committee actively meets and discussing general agenda and other issue related to handling sexual harassment, dissemination of sexual harassment prevention.</p> <p>Based on interview with Gender Committee, company has implemented the protection of women reproductive rights, in form of maternal leave, period leave, and regular pregnancy check for female sprayers and strictly prohibit pregnant and/or breastfeeding female worker applying pesticides. The latest pregnancy checks on May 2023; The result of pregnancy test is "negative".</p> <p>When in pregnancy checking there are confluence workers who stated "positive", then based on the company's policy above, the woman workers to be transferred to other work which not related to chemistry (spray or fertilizing).</p>	Complied
6.1.5	(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.	<p>The company has formed a Gender Committee at Tanjung Selamat Estate and Mill. During this audit there is no changing of Gender Committee structure which is chaired by Romasi Banjarnahor and Ms. Ratna Dewi Ginting as a secretary, based on the Gender Committee Organizational Structure as of 26 August 2014. Coordinators are assigned at each Afdiling; Afdeling 1: Ms. Katarina Hutasoit, Afdeling 2: Ms. Misnawati, Afdeling 3: Ms. Find Dahlia Manurung and Afdeling 4: sdiri. Ratih Pratiwi and membership are all female workers in PT ISJ and SSR.</p> <p>On 2023 Gender Committee Work Program has been established including the issues that will be discussed at the meeting, including:</p> <ul style="list-style-type: none"> - Receive female employee complaint. 	Complied

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		<ul style="list-style-type: none"> - Accepting all Defending and guaranteeing the rights of women workers. - Carry out routine immunization of children to mothers who have toddlers. - Conduct family health education with environmental cleanliness. <p>The regular monthly gender committee meeting was held on 11 January 2023 which discussed refreshment the committee gender work programme; meeting dated 20 march 2023 discussing awareness to women workers, occupational health and safety, family healthcare. Based on the records of the routine meeting and interviews with management, that during the period 2022-ytd 2023 there were no cases related to gender issues.</p>	
6.1.6	There is evidence of equal pay for the same work scope.	<p>The application of wages for the period of 2023 is uses the basis of wages based on the Decree of the Governor of North Sumatra No. 188.44/1004/KPTS/2023 dated 7 December 2022 regarding the Sectoral Minimum Wage of Labuhan Batu Regency in 2023 of IDR 3,284,500 per month.</p> <p>The company through the Regional Head, Plantation I, has issued Memorandum No. 027/HR-RO/MEMO/05/2023 dated May 2, 2023 concerning the increase in wages for PHL, SKUH and SKUB workers in 2023, namely:</p> <ul style="list-style-type: none"> - Wages for PHL employees (freelance workers): IDR 3,284,500 per month or IDR 131,380 per day - SKUH Employee Wages of IDR 3,172,000 per month or an increase of IDR 10,000 per month. - SKUB employee wages, there is an increase of IDR 10,000 per month and has been adjusted to the 2023 wage table. <p>Verification of sample employee salary slips and payroll documents for the April 2023 period for several workers were sighted during audit.</p>	Complied

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		Based on the employee salary slips, that PT RSK and PT ISJ has implemented a minimum wage in accordance with applicable regulations (Decree of the Governor of North Sumatra No. 188.44/1004/KPTS/2023 dated 7 December 2022).	
Criteria 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).			
6.2.1	(C) Documentation of pay and working conditions in accordance with applicable labour laws are available to the workers in national languages and explained to them in language they understand.	<p>The application of wages for the period of 2023 is uses the basis of wages based on the Decree of the Governor of North Sumatra No. 188.44/1004/KPTS/2023 dated 7 December 2022 regarding the Sectoral Minimum Wage of Labuhan Batu Regency in 2023 of IDR 3,284,500 per month.</p> <p>The company through the Regional Head, Plantation I, has issued Memorandum No. 027/HR-RO/MEMO/05/2023 dated May 2, 2023 concerning the increase in wages for PHL, SKUH and SKUB workers in 2023, namely:</p> <ul style="list-style-type: none"> - Wages for PHL employees (freelance workers): IDR 3,284,500 per month or IDR 131,380 per day - SKUH Employee Wages of IDR 3,172,000 per month or an increase of IDR 10,000 per month. - SKUB employee wages, there is an increase of IDR 10,000 per month and has been adjusted to the 2023 wage table. <p>The company is also gives a scripts/payslip to employees before salary is given, salary slip also contains basic salary, allowances, premium, labor health coverage (BPJS Ketenagakerjaan and Kesehatan) and deduction as well. Payslip documents are made in Indonesian so they can be understood by all workers.</p> <p>Verification of sample employee salary slips and payroll documents for the April 2023 period, as shown in 6.1.6 above.</p>	Complied

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		Determination and implementation including of payment documentation of wage both of PT ISJ and PT RSK has accordance with the Decree of the Governor of North Sumatra No. 188.44/17/KPTS/2020 dated January 13, 2020 regarding the Sectoral Minimum Wage of Labuhan Batu Regency in 2020 and UU no. 11/2020 regarding manpower as well.	
6.2.2	(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed.	<p>The renewal of PKB or working agreement for 2022 – 2024 are still under process of approval and registration to Ministry of Manpower. According the provisions in the PKB it is stated that if the new PKB is not yet available, the old PKB is still valid to be used as a reference.</p> <p>The company has set employment provisions in accordance with the rules and legal requirement. It is stated on employment contract off daily labour on article 1 about the types of work, working hours (maximum 40 hours per week and working from Monday to Saturday) and the wages has provides is based on waging regulation (Decree of Governor of North Sumatera) in effect at January 2020. Statements about wages, stated in PKB in Article V concerning Wages-Upah; stated: <i>"Pekerja harian Tetap dan Pekerja Bulanan diberi upah berupa uang yang ditetapkan berdasarkan kesepakatan bersama dengan BKS-PPS dengan PD.FSP.PP-SPSi Propinsi yang bersangkutan sesuai dengan peraturan perundangan Otonomi Daerah yang berlaku, yaitu upah uang ditambah beras pekerja senilai/sejumlah 15 Kg (Upah BKS-PPS), dengan mengingat situasi ekonomi dan kemampuan perusahaan"</i>.</p> <p>The Joint working Agreement (PKB 2022-2024 period) and the daily labour contract of the wage was presented in Bahasa Indonesia, so all employees can understand it and this PHL work agreement is handed over to the workers concerned after being described by the management (through KTU), so that employees who can not read the writing can understood.</p> <p>Based on the employee master at PT ISJ and PT RSK, there are still employees who are PHL (daily workers) where for work that is not</p>	Non-compliance

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		<p>permanent (not the main job), verification of the contents of the PHL work agreement is carried out, as follows:</p> <ul style="list-style-type: none"> - Working Agreements of PHL No. 037/PKHL/KTS/01/2023 on behalf of Andeleston Hutahaeon on position plantation upkeep. - Working Agreements of PHL No. 038/PKHL/KTS/01/2023 on behalf of Pazar Z.M. as plantation upkeep. - Working Agreements of PHL No. 083/PKHL/KET/II/2023 dated 3 February 2023 on behalf of Agus Pedamaiyan as plantation upkeep. - Working Agreements of PHL No. 053/PKHL/KET/II/2023 dated 27 February 2023 on behalf of Martinus Lase as plantation upkeep. <p>Determination of wages (including benefits and other bebefit), working hours (including hours and overtime pay) and working days have been regulated in the PKB Period 2018-2020 in Article V; Upah - Wages, which explains:</p> <ol style="list-style-type: none"> a) Permanent workers are given wages, the value of which is determined by the employer on the condition that it is not lower than government regulations. b) Certain permanent workers are given wages (Basic Salary and Rice) in accordance with the status of the group/level whose value is determined by the employer with provisions not lower than government regulations c) Permanent workers receive additional wages (UMP / UMSK) and / or attendance incentives as stipulated further in separate provisions. <p>Rice allowance is: 9 kg and each anal (maximum 3 children) is given 7.5 kg per month, which consists of the basic salary and rice allowance. Rice supply is given once a month. Rice supply is intended to be of good quality and is considered appropriate for the health of the Worker and the gift is linked to attendance.</p>	
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		<p>Provisions on holidays and leave (both maternity leave and menstruation leave) have been regulated in Article VIII regarding Non-working Days; including absenteeism, rest days of the week, official holidays, annual leave, maternity leave and others.</p> <p>The company is also gives a scripts/payslip to employees before salary is given, salary slip also contains basic salary, allowances, premium, labor health coverage (BPJS Ketenagakerjaan and Kesehatan) and deduction as well. Based on sample salary slip shown that the company has paid wages employees salary according to the working days and it is applied in a fair to all employees.</p> <p>Verification is carried out to several employee's document, including:</p> <ul style="list-style-type: none"> - Application letter for employee leave on behalf of Muhammad Efendi (plant maintenance) applying for annual leave on 15 – 17 May 2023 (3 days), in accordance with applicable laws and regulations. - Overtime Order dated May 16, 2023 at Tanjung Selamat Estate on behalf of H. Silalaban (00145) for field patrol work for 1.5 hours, in accordance with applicable regulations. - Overtime Order issued on 13 February 2023 at the Pangkatan Estate on behalf of Sudarson Simbolon to conduct field patrols for 1.5 hours, in accordance with applicable regulations. <p>Nonconformity raised during audit:</p> <p>Based on interviews result with employees at Tanjung Selamat Estate in harvesting activity at Block A17k Afd I with a sample of employees (Initial IN, JN, RI) and B15i-Afd II with a sample of employees (Initial FM), it was found that there were workers who assisted in harvesting activities (taking loose fruit) who were not registered as workers and did not have work contracts with the company.</p>	
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6.2.3	<p>(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, and other legal labour requirements.</p>	<p>The renewal of PKB or working agreement for 2022 – 2024 are still under process of approval and registration to Ministry of Manpower. According the provisions in the PKB it is stated that if the new PKB is not yet available, the old PKB is still valid to be used as a reference.</p> <p>The company has set employment provisions in accordance with the rules and legal requirement. It is stated on employment contract off daily labour on article 1 about the types of work, working hours (maximum 40 hours per week and working from Monday to Saturday) and the wages has provides is based on waging regulation (Decree of Governor of North Sumatera) in effect at January 2020. Statements about wages, stated in PKB in Article V concerning Wages-Upah; stated: <i>“Pekerja harian Tetap dan Pekerja Bulanan diberi upah berupa uang yang ditetapkan berdasarkan kesepakatan bersama dengan BKS-PPS dengan PD.FSP.PP-SPSi Propinsi yang bersangkutan sesuai dengan peraturan perundangan Otonomi Daerah yang berlaku, yaitu upah uang ditambah beras pekerja senilai/sejumlah 15 Kg (Upah BKS-PPS), dengan mengingat situasi ekonomi dan kemampuan perusahaan”.</i></p> <p>The Joint working Agreement (PKB 2022-2024 period) and the daily labour contract of the wage was presented in Bahasa Indonesia, so all employees can understand it and this PHL work agreement is handed over to the workers concerned after being described by the management (through KTU), so that employees who can not read the writing can understood.</p> <p>Provisions on holidays and leave (both maternity leave and menstruation leave) have been regulated in Article VIII regarding Non-working Days; including: absenteeism, rest days of the week, official holidays, annual leave, maternity leave and others.</p> <p>The company is also gives a scripts/payslip to employees before salary is given, salary slip also contains basic salary, allowances, premium, labor health coverage (BPJS Ketenagakerjaan and Kesehatan) and</p>	Complied
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		<p>deduction as well. Based on sample salary slip shown that the company has paid wages employees salary according to the working days and it is applied in a fair to all employees.</p> <p>Take some samples:</p> <ul style="list-style-type: none"> - Payslips have been explained on 6.6.1 above and it proven to have complied with the applicable laws and regulations. - Application letter for employee leave on behalf of Muhammad Efendi (plant maintenance) applying for annual leave on 15 – 17 May 2023 (3 days), in accordance with applicable laws and regulations. - Overtime Order dated May 16, 2023 at Tanjung Selamat Estate on behalf of H. Silalaban (00145) for field patrol work for 1.5 hours, in accordance with applicable regulations. - Overtime Order issued on 13 February 2023 at the Pangkatan Estate on behalf of Sudarson Simbolon to conduct field patrols for 1.5 hours, in accordance with applicable regulations. <p>Based on interviews with workers, that the application of weekly rest/rest days at PT ISJ and PT RSK is on Sundays and/or days that have been determined by the government.</p>	
6.2.4	<p>(C) The unit of certification provides adequate housing. Sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.</p>	<p>In general, there were no changes related to public facilities and employee housing, namely: Housing, Child Care Center-BPA, electricity supply (gensets) for housing and clean water supply, clinics, sports facilities, employee halls, provision of school buses for houses of worship (mosques and churches) etc.</p> <p>The list of public facilities include:</p> <p>PMKS Tanjung Selamat:</p> <ul style="list-style-type: none"> - Emplacement – Employee Housing (type: E1: 190 units, E2: 78 units, D1: 12 units) 	Complied

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		<ul style="list-style-type: none"> - Employee hall (1 unit) - Clinic (1 unit) - Mosque (1 unit) - Church (1 unit) - Child care (2 units) <p>Tanjung Selamat Estate:</p> <ul style="list-style-type: none"> - Emplacement – Employee Housing (type: E4: 200 unit, E2: 100 unit, D1: 12 unit) - Elementary school (1 unit) - Clinic (1 unit) - School bus (2 unit) - Ambulance (1 unit) - Mosque (5 unit) - Church (3 unit) <p>Pangkalan Estate:</p> <ul style="list-style-type: none"> - Employee housing (type: C121: 4 unit, CM: 1 unit, C1: 4 unit, D1-semi permanent: 16 doors, D2- semi permanent: 4 doors, D2 kayu: 20 doors, E1-semi permanent: 54 doors, E2 kayu: 100 doors, E40: 198 doors, etc.) - Elementary school (1 unit SD Bina Dharma) - Clinic (1 unit) - Scool bus (2 unit) - Ambulance (1 unit) - Mosque (3 unit) - Church (1 unit) - Sports field (2 units of football, 1 unit of badminton, 1 unit of 	
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		<p>volleyball)</p> <ul style="list-style-type: none"> - 3 units of Child care (location in: main camp, merbau, pulau intan) - Electricity by 3 units Genset - Clean water using 3 drilled wells (main camp, merbau, diamond island) - Landfill at Block C91s <p>The Company has provided a clinic at the plantations and has permit from Dinas Penanaman Modal dan Pelayanan Terpadu Satu Pintu namely "Surat Izin Operasional Klinik Pratama Klinik Asian Agri Sehat Aek Nabara" No. 503.445.1/177/DMPSTP-BP4/2017 dated 7 November 2017 and valid for 5 years (permit extension has been submitted and is still in process at the Labuhan Batu District Health Office). The company also provides a doctor who is responsible in klinik on behalf of dr. Nahdhia and has permit "Surat Izin Praktik (SIP) Dokter from Dinas Penanaman Modan dan Pelayanan Terpadu Satu Pintu No. 503.446.1/283/DMPMTSP-BP4/2017 dated 5 December 2017 and valid until 11 September 2023.</p> <p>The company has prepared a budget for the maintenance and repair of employee housing and public facilities made in the CAPEX Budget document for the 2023 period, which consists of:</p> <ol style="list-style-type: none"> 1. Buildings: Security Post, Employee House, Office, TPA, School 2. Infrastructure: Bridges, Box Culvert, Horse Hoof, Land Applications 3. Light Vehicle: Cars, School Buses, Ambulance 4. Workshop & Agriculture: Eq All tools and equipment for workshops, workshops, agricultural equipment 5. Water & Electricity: Eq Generators, Water Pumps 	
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6.2.5	The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.	<p>Worker receives rice by organization that was distributed twice a month. This was mentioned in the "Collective Work Agreement" (PKB) between employees and the organization.</p> <p>In addition, organization has provided special area in place for local market. Local market provides food for worker. The market is nearby the company site and company also provide minimarket, namely "Waserda Bina Mandiri"</p>	Complied
6.2.6	A DLW is paid to all workers in accordance with applicable regulations, including workers who work on a piece rate/quota basis, the calculation of which is based on a quota that can be achieved during regular working hours.	<p>The application of wages for the period of 2023 is uses the basis of wages based on the Decree of the Governor of North Sumatra No. 188.44/1004/KPTS/2023 dated 7 December 2022 regarding the Sectoral Minimum Wage of Labuhan Batu Regency in 2023 of IDR 3,284,500 per month.</p> <p>The company through the Regional Head, Plantation I, has issued Memorandum No. 027/HR-RO/MEMO/05/2023 dated May 2, 2023 concerning the increase in wages for PHL, SKUH and SKUB workers in 2023, namely:</p> <ul style="list-style-type: none"> - Wages for PHL employees (freelance workers): IDR 3,284,500 per month or IDR 131,380 per day - SKUH Employee Wages of IDR 3,172,000 per month or an increase of IDR 10,000 per month. - SKUB employee wages, there is an increase of IDR 10,000 per month and has been adjusted to the 2023 wage table. <p>The company also made calculations related to DLW, based on the wages given to employees as costs given by the company: Following is DLW Calculation:</p>	Complied

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No.	In Kind Benefits	Total
1.	Housing (Cost of Building: 30 years) + (Annual Maintenance: Number of Houses) ÷ 12 Months	255,43
2.	Electricity & Water (Annual cost of water & electricity ÷ Number of houses) ÷ 12 Months	248,717
3.	Education [(Total cost not including teacher and non teacher labour cost + school transport + school building maintenance + food for children) ÷ number of workers] ÷ 12 months	68,129
4.	Creche Facilities (TPA) (Building maintenance + Food for children + supplies + caretaker cost) ÷ Number of workers	13,027
5.	Helathcare (Kesehatan) (Maintenance of clinic, medicine & medical materials, ambulance transport cost + cost of helathcare workers) ÷ Number of workers	407
6.	Food	54,801
7.	Sport & Recreation Facilities	3,432
Total Cost of In Kind Benefits		643,943
Average Monthly Take Home Salary per Worker		2,693,286
Total Value of Prevailing Wage		3,337,229

This DLW was compared with the 2023 standard minimum wage of Rp 3,284,500, the company has provided living expenses to employees amounting to Rp 3,337,229 per month or greater than Rp 52,729 per month from the monthly wage.

PROCEDURAL NOTE:

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

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

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

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Once the DLW benchmark is available, this procedural note is no longer applicable.			
6.2.7	Permanent fulltime employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal	<p>Based on the verification of employee data for PT ISJ and PT RSK including Tanjung Selamat Mill period 2023 ytd April 2023, company has permanent and non-permanent employees (SKU and PHL).</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 Permenakertrans No. 19/2012 which implementation can be left to other parties.</p> <p>Based on the employees master period April 2023, that PT ISJ and PT RSK still has temporary workers (Daily worker: PHL) who do harvesting as core works. However company has a program to promote the non permanent workers to become permanent workers after the probation and evaluation.</p> <p>The company has established a program for the appointment of PHL (non permanent) 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 Labuhan Batu Regency.</p> <p>Implementation of the promotion of daily/non permanent harvesting workers to permanent workers:</p> <p>1) <u>Tanjung Selamat Estate:</u></p>	Complied

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		<ul style="list-style-type: none"> - In 2022, there were a promotion for hiring permanent workers (SKUH) for 28 harvesters at Tanjung Selamat Estate - In Semester I of 2023 the promotion of permanent worker appointments (SKUH) for harvesters is 6 harvesters. - In the second semester of 2023, 20 harvesters have been proposed for promotion of PHL to SKU (Permanent Worker) Tanjung Selamat Estate harvesters and have received approval from the HRD Department even though the Memorandum of appointment has not been issued. - Recruitment after the April 2023 period, 27 harvesters, have followed company policy regarding the recruitment of harvesters, namely the recruitment of permanent workers (SKU) with a probationary period of 3 months. After a 3 month probationary period (July – August 2023) an evaluation of the harvesters will be carried out and a decision will be made for appointment as SKU workers (permanent workers). <p>2) <u>Pangkatan Estate:</u></p> <ul style="list-style-type: none"> - In 2022, 20 harvesters have been promoted to permanent workers (SKU). - In semester I of 2023 there will be 15 harvesters. - So that as many as 10 harvesters in the Estate Rankings in the April 2023 period have implemented a permanent worker recruitment program with a 3-month probationary period. So that later in July-August an evaluation will be carried out on the 10 harvesters and will be carried out directly as permanent workers after going through the evaluation. <p>3) <u>Tanjung Selamat Mill:</u></p>	
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		<ul style="list-style-type: none"> - In Semester I of 2022, 2 PHL employees have been proposed based on the Memorandum: 01/HR-RO1/MEMO/3/2022, on behalf of Budi Haryawan and Dedek Riansyah. - In Semester I of 2023, 2 workers (part of the process) have been promoted to PHL workers to become SKUH (Permanent Workers). <p>Up to the April 2023 surveillance, there was still a recruitment of 5 workers with a permanent worker recruitment program with a probationary period of 3 months, so that in June-August 2023 there will be an evaluation of the 5 recruited workers and will then be promoted on a regular basis immediately became a permanent worker (SKUH).</p>	
<p>Criteria 6.3: The unit of certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			
6.3.1	<p>(C) A published statement recognizing freedom of association and right to collective bargaining in national languages is available and is explained to all workers in languages that they understand, and is demonstrably implemented.</p>	<p>Freedom of association and right to collective bargaining policy stated in "Kebijakan Perusahaan", updated 01st December 2019. Stated in Point 16 "<i>Menghormati hak setiap karyawan untuk membentuk atau menjadi anggot serikat pekerja sesuai dengan keinginannya dan untuk melakukan tawar-menawar secara kolektif</i>" - Respect the right of every employee to form or join trade unions of his choice and to bargain collectively. The policy is written in Bahasa Indonesia, this policy has been informed and communicated to all employees and being placed into public area easily accessed.</p> <p>Workers of PT Indo Sepadan Jaya (Tanjung Selamat and Pangkatan Estate) has established a Labor Union in accordance with the Decision Letter of PD FSPPP - SPSI of North Sumatra No. Kep-24/ORG/PC FSPPP-LBR/IX/2019, dated 3 September 2019 regarding "Pengukuhan Pengurus Unit Kerja Serikat Pekerja Pertanian dan Perkebunan – Serikat Pekerja Seluruh Indonesia (PUK SP.PP-SPSI) PT Indo Sepadan Jaya Kebun Tanjung Selamat Kec. Kampung Rakyat, Kabupaten Labuhanbatu</p>	Complied

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		<p>Selatan Masa Bakti 2019-2024”, and has been registered with the Manpower Office of Labuhanbatu Regency. 26/DTK-VIII/ 2001 dated August 30, 2001 Chaired by Josmart Tamba and Saymsul Saragih as secretarist.</p> <p>Worker union in PT Rantau Sinar Karsa has formed according to “Surat Keputusan PC FSP.PP-SPSI Wilayah Kabupaten Labura No. Kep 22/ORG/PC FSPPP-LBR/VII/2019, dated 8 July 2019 regarding “Penguksuhan Pengurus Unit Kerja PUK SP.PP-SPSI PT Rantau Sinar Karsa Kec. Pangkatan, Kab. Labuhan Batu periode 2019-2024”. Worker union has been registered in Dinas Tenaga Kerja Kabupaten Labuhan Batu No. 26/DTK-VIII/2001 since dated 30 August 2001. Worker Union always conducts communication and consulting with management to discuss the employment issue.</p>	
6.3.2	Minutes of meetings between the unit of certification with trade unions or worker representatives who are freely elected, are documented in the national languages and available upon request.	<p>Worker Union always conducts communication and consulting with management, some meetings with management. Sample taken of record of meeting between company and labour union is conducted regularly, e.g.:</p> <ol style="list-style-type: none"> 1. On 12 March 2022, Meeting between Management PT Indo Sepadan Jaya and PUK FSPP-SPSI PT Indo Sepadan Jaya to discuss about discipline of finger print, prohibition of alcohol drink. 2. On 13 April 2022, the meeting was discussed related Tunjangan Hari Raya (THR), Annual wages increment, bonus and patrol during Iedul Fitri Holiday. 3. On 5 April 2022, meeting with the management to discussed related the maintenance and repairing the workers housing facility. 4. On 10 May 2023, meeting bipartite with the management to discussed related the workers issue. <p>Since lates audit until audit ASA 1.2 conducted there is no issue related to workers and industrial relationship.</p>	Complied

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6.3.3	Management does not interfere with the formation or operation of registered labour organizations/unions, or other freely elected representatives for all workers, including migrant and contract workers.	<p>The union has 385 members, consisting of: Pangkatan Estate (PT RSK): 166 workers, PT ISJ: Tanjung Selamat Mill: 74 members, Tanjung Selamat Estate: 241 members.</p> <p>Based on interviews with the head workers' unions of the Tanjung Selamat Estate and Pangkatan Estate, the management of PT ISJ and PT RSK did not intervene and influence the organizational structure in terms of establishing the organizational structure. Trade unions can freely recruit their members and as a sign of membership, the union also provides its membership card.</p>	Complied
Criteria 6.4: Children are not employed or exploited.			
6.4.1	A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.	<p>Up to this surveillance audit, there have been no changes related to the company's policy on child labour; A formal policy for the protection of children, including prohibition of child labour and remediation are available in "Kebijakan Perusahaan" signed by Managing Director on 1st December 2019. In the policy stated that Company are prohibited to employ the child in the company operation. Child employee are under age 18th years old according to UU No. 13 Tahun 2003.</p> <p>The policy are included in the service contract and supplier agreement, sample seen:</p> <ul style="list-style-type: none"> - Agreement contract with CPO/PK transporter Pengangkutan Sekawan Jaya "Perjanjian Pengangkutan Nomor: 02/X/SKJ-ISJ/2021" dated 1st October 2021; at Article 7 point e. "<i>Tidak mempekerjakan anak dibawah umur yang dilarang oleh peraturan perundangan ketenagakerjaan yang berlaku</i>" - Agreement contract with PT Buana Putra Jaya Lestari No. 01/SPJ/LEGISJ/III/21 dated 16 March 2021 – 30 March 2021, Scope of work: housing building. Annex 1 No. 7 "<i>Menjamin bahwa tenaga kerja pihak ke dua bukan pekerja anak yang dilarang oleh Undang-undang ketenagakerjaan</i>". 	Complied

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		<ul style="list-style-type: none"> - Agreement Contract of FFB supplying on behalf of BUMDES Tebing Tinggi Sejahtera No. 008/TBS/ISJ/2021 dated 1 May 2021. <p>The contract was described several company policies, including:</p> <ul style="list-style-type: none"> - The seller is willing to show the legality document of ownership - Prohibition of child labor, forced labor and human trafficking - Call to uphold human values and prohibit retaliation against Human Rights Defenders (HRD) and prohibit harassment and intimidation <p>Heavy equipment rental agreement (Wheel Loader) on behalf of Nurkanim Saragih No. 168/E1PTS/09/20 dated 2 September 2020. It is explained in the contract regarding the prohibition of working children on:</p> <ul style="list-style-type: none"> - Point a; The Second Party is obligated to make payment of salaries/wages in accordance with the provisions of the minimum wage determined by the applicable Government. - Point b; The second party guarantees that the second party does not employ minors that are prohibited by applicable labor laws and regulations - Point c; obliged to maintain the functional preservation of the environment as well as to prevent and deal with environmental pollution and destruction in accordance with the provisions of Law no. 32 years 2009 	
6.4.2	<p>(C) Documented evidence on the fulfilment of worker’s minimum age requirements in accordance with applicable regulation and verification procedures for age requirements, are available.</p>	<p>Based on document verification of list employe Tanjung Selamat Mill, Tanjung Selamat Estate and Pangkatan Estate confirmed that there is no workers under age of 18 years old; the youngest workers birthday were 1996 and 1997 or 24/25 years old.</p> <p>Company also has procedure for employee recruitment as per SOP AA-HR- 305.2 – RO Rekrutmen dan Seleksi Karyawan, dated 1 February 2009. Stated in Section 7.0 Tahapan Seleksi – usia minimum kandidat</p>	Complied

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		yang diterima adalah 18 tahun, minimum age employee hiring accepted was 18th years old.	
6.4.3	(C) Young person maybe employed only for non-hazardous work with protective restrictions in place for that work.	<p>There is no young person under 18 years old employ in PT Indo Sepadan Jaya Tanjung Selamat Mill, Tanjung Selamat Estate and Pangkatan Estate.</p> <p>Based on document verification of list employe Tanjung Selamat POM, Tanjung Selamat Estate and Pangkatan Estate confirmed that there is no workers under age of 18 years old; the youngest workers birthday were 1996 and 1997 or 24/25 years old.</p>	Complied
6.4.4	The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.	<p>A formal policy for the protection of children, including prohibition of child labour and remediation are available in "Kebijakan Perusahaan" signed by Managing Director on 1st December 2019. In the policy stated that Company are prohibited to employ the child in the company operation. Child employee are under age 18th years old according to UU No. 13 Tahun 2003.</p> <p>The policy are included in the service contract and supplier agreement, sample seen:</p> <p>Agreement contract with CPO/PK transporter Pengangkutan Sekawan Jaya "Perjanjian Pengangkutan Nomor: 02/X/SKJ-ISJ/2019" dated 1st October 2019; at Article 7 point e. "Tidak mempekerjakan anak dibawah umur yang dilarang oleh peraturan perundangan ketenagakerjaan yang berlaku"</p> <p>Agreement contract with PT Buana Putra Jaya Lestari No. 01/SPJ/LEG-ISJ/III/19 dated 16 March 2019 – 30 March 2019, Scope of work: housing building. Annex 1 No. 7 "Menjamin bahwa tenaga kerja pihak ke dua bukan pekerja anak yang dilarang oleh Undang-undang ketenagakerjaan".</p>	Complied
Criteria 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.			

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6.5.1	(C) A policy to prevent sexual and all other form of harassment and violence is documented, implemented and communicated to all levels of the workforce.	<p>A policy to prevent sexual and all other form of harassment and violence are available in "Kebijakan Perusahaan" signed by Managing Director on 1st December 2019. In the policy point 15 stated that "<i>Mencegah pelecehan seksual dan berbagai bentuk kekerasan terhadap perempuan serta melindungi hak-hak reproduksinya</i>". The policy is written in Bahasa Indonesia, this policy has been informed and communicated to all employees and being placed into public area easily accessed.</p> <p>The policy has been communicated to all level workforce, sample seen: socialization to workers of Tanjung Selamat Estate on 13 January 2023. Socialization to workers also conducted through muster morning and banner/poster available in Afdeling/Mill Office.</p>	Complied
6.5.2	(C) A policy to protect the reproductive rights of all, especially of women, is documented, implemented and communicated to all levels of the workforce.	<p>A policy to protect the reproductive rights of all, especially of women are available in "Kebijakan Perusahaan" signed by Managing Director on 1st December 2019. In the policy point 15 stated that "<i>Mencegah pelecehan seksual dan berbagai bentuk kekerasan terhadap perempuan serta melindungi hak-hak reproduksinya</i>". The policy is written in Bahasa Indonesia, this policy has been informed and communicated to all employees and being placed into public area easily accessed.</p> <p>The policy has been communicated to all level workforce, sample seen: socialization to workers of Tanjung Selamat Estate on 13 January 2023. Socialization to workers also conducted through muster morning and banner/poster available in Afdeling/Mill Office.</p> <p>Policies that have been made by companies related to the protection of women's rights such as;</p> <ol style="list-style-type: none"> a. The company has provided menstrual leave for female employee in accordance with the recommendation from paramedic in clinic, and this is in line with "Perjanjian Kerja Bersama" and applicable regulations. b. The company has granted the right for maternity leave the women who gave birth in accordance with the applicable rules and 	Complied

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		<p>“Perjanjian Kerja Bersama”.</p> <p>c. The company has consistently performed pregnancy tests to women workers who worked as a fertilizer and spraying every 1 month.</p> <p>d. The company has a policy of not hiring female labor during pregnancy or breast-feeding for the kind of work that endanger such as fertilizer or spraying by temporarily moving the work force to other types of work.</p> <p>e. The company has consistently performed regular health checks for sprayers every six months.</p>	
6.5.3	Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified in accordance with applicable regulations in Indonesia.	<p>Management has conducted surveys and consultations with 30 female workers using the direct interview method in January 2020 to identify the needs of female workers who have children/babies under 5 years old and are still breastfeeding. From the results of the survey and consultation, management issued several policies, including:</p> <ul style="list-style-type: none"> - Policy for employees who are breastfeeding, based on the Memorandum of the Plantation Manager No. 171/ES-KPT/MEMO/01/20 dated January 4, 2020, stated: the company guarantees female employees to breastfeed their children during working hours, by giving time and place to all female employees who have babies to breastfeed their children once for 45 minutes. : in the morning at 10.00-10.45 WIB at the clinic or afdeling office or 11.30 - 12.15 WIB. - Periodic check-ups at the clinic to monitor the baby's health by providing POSYANDU services once a month at the Central TPA (Child Care Center) including the provision of immunizations and vitamins. <p>Until audit ASA 1.2 company consistently implementing the policy to guarantees female employees to breastfeed their children during</p>	Complied

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		<p>working hours, by giving time and place to all female employees who have babies to breastfeed their children.</p> <p>The company has provided menstrual leave for female employee in accordance with the recommendation from paramedic in clinic, and this is in line with "Perjanjian Kerja Bersama" and applicable regulations.</p> <p>The company has granted the right for maternity leave the women who gave birth in accordance with the applicable rules and "Perjanjian Kerja Bersama".</p> <p>The company has consistently performed pregnancy tests to women workers who worked as a fertilizer and spraying every 1 month.</p> <p>The company has a policy of not hiring female labor during pregnancy or breast-feeding for the kind of work that endanger such as fertilizer or spraying by temporarily moving the work force to other types of work.</p>	
6.5.4	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>Company has establish Standard Operating Procedure, No. SOP: XX-HR-308.5-RO; Revision: 0, December 11th 2009: Employees complaints: submission and settlement. Mechanism for complaints management where it needs to protect its confidentiality for complaint submitter was found in company policy's as in one of points of this policies stated that:</p> <p><i>"To provide appropriate information for those who inquiry it and to protect its confidentiality for whistle blower cases in accordance to law regarding environmental and social issue, food safety, health and safety work, so that it enables them to more participate to the decision making processes for improving company's performance".</i></p> <p>Record of complaint/specific grievance has demonstrated under "Buku Keluhan Karyawan". The company has resolved all complains according to the procedure.</p> <p>Until this audit, there is no grievance or report of sexual harassment and abuse. This also confirmed during interview with sampled female workers, gender committee and labour union.</p>	Complied

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		Based on the records of the routine meeting and interviews with management, that during the period 2022-ytd 2023 there were no cases related to gender issues or sexual harassment.	
Criteria 6.6: No forms of forced or trafficked labour are used.			
6.6.1	<p>(C) All work is voluntary and the following are prohibited:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports; • Payment of recruitment fees; • Contract substitution without worker's consent • Involuntary overtime; • Lack of freedom of workers to resign • Penalty for termination of employment, unless the unit of certification and the workers agree to the penalty and it is stated in the employment agreement • Debt bondage • Withholding of wages 	<p>During audit and according to work contract, confirmed that all work is voluntary and there is no:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports; • Payment of recruitment fees; • Contract substitution without worker's consent • Involuntary overtime; • Lack of freedom of workers to resign • Penalty for termination of employment, unless the unit of certification and the workers agree to the penalty and it is stated in the employment agreement • Debt bondage • Withholding of wages <p>No form of forced labor occur in PT Indo Sepadan Jaya and PT Rantau Sinar Karsa. Company has a policy to comply with manpower regulation UU No. 13 Tahun 2003. 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>	Complied
6.6.2	<p>(C) Where temporary (Specified Time Work Agreement/PKWT) or migrant workers are employed, a specific labour policy and procedures are established and evidence of implementation is available.</p>	<p>There is no migrant workers in PT Indo Sepadan Jaya – Tanjung Selamat POM, Tanjung Selamat Estate and Pangkatan Estate. There is no PKWT workers in PT Indo Sepadan Jaya</p>	Complied

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		<p>For permanent workers, term and condition Company has agreement in PKB which contain term and condition for workers.</p> <p>For casual workers contract available in "Perjanjian Kerja Harian Lepas". Labour policy are provided in "Kebijakan Perusahaan" and procedure to manage the workers are available in SOP AA-HR-305.2 – RO Rekrutmen dan Seleksi Karyawan, dated 1 February 2009.</p> <p>PT Indo Sepadan Jaya – Tanjung Selamat POM and Estate and PT Rantau Sinar Karsa – Pangkatan Estate has issued the specific labour policy and procedures for temporary workers (PHL/PKWT); The policy and procedure are issued for each unit as below:</p> <ul style="list-style-type: none"> - Tanjung Selamat POM: Memorandum No. 009/Mill-PTS/INT/07/2020 dated 24 July 2020. - Tanjung Selamat Estate: Memorandum No. 171/ES-KTS/MEMO/07/2020 dated 23 July 2020. - Pangkatan Estate: Memorandum No. 266/ MEMO/INT/07/2020 dated 01 July 2020. <p>The policy and procedure has been communicated to temporary workers at Tanjung Selamat POM on 25 July 2020, in Tanjung Selamat Estate on 3 August 2020 and in Pangkatan Estate on 4 July 2020.</p> <p>The procedure was explain the detail of mechanism for temporary workers recruitment, promotion of temporary workers to be permanent workers, term and condition and requirement of temporary workers in accordance with National regulation (UU No. 13 tahun 2003) and UU no.11 Tahun 2021 UU Cipta Kerja.</p>	
Criteria 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.			
6.7.1	(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers.	PT Indo Sepadan Jaya Tanjung Selamat POM and Estate has appointed the responsible person) for H&S is identified as per P2K3 (Safety	Complied

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	<p>Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p>	<p>Committee Meeting). P2K3 has an approval from Manpower and Transmigration Office.</p> <p><u>Tanjung Selamat POM</u></p> <p>P2K3 Tanjung Selamat POM has been formed and updated in 2023 and has an endorsement/approval from Manpower Office Sumatera Utara Province according to "Surat Keputusan Kepala UPT Pengawasan Ketenagakerjaan Wilayah IV Dinas Tenaga Kerja Provinsi Sumatera Utara Nomor: KEP.162-7/P2K3/WIL-IV/DTK/SU/2023 tentang Pengesahan Panitia Pembina Keselamatan dan Kesehatan Kerja (P2K3) di Perusahaan" dated 22 May 2023. Head of P2K3 was Mill Manager Maruli Tua Sihombing. Safety Officer or "Ahli K3 Umum" OSH expert was assigned as P2K3 secretary. Safety Officer on behalf Fahreza Hafiz has a license from Ministry of Manpower with decree letter Nomor 5/17418/AS.02.04/XII/2021 dated 29 December 2021 Tentang Penunjukan Ahli K3 umum, valid until 29 December 2024.</p> <p><u>Tanjung Selamat Estate</u></p> <p>P2K3 Tanjung Selamat Estate has been formed and updated in 2023 and has an endorsement/approval from Manpower Office Sumatera Utara Province according to "Surat keputusan Kepala Dinas Tenaga Kerja Kabupaten Labuhan Batu Nomor : KEP.27.a-7/P2K3/WIL-IV/DTK/SU/2023 tentang Pengesahan Panitia Pembina Keselamatan dan Kesehatan Kerja di Perusahaan" dated 25 January 2023. Head of P2K3 was Esatate Manager K. Morrrys H. T. Safety Officer or "Ahli K3 Umum" OSH expert was assigned as P2K3 secretary. Safety Officer on behalf Karten Malau has a license from Ministry of Manpower with licence number No. Reg. 47023/PK3/AJ/12/2021/P1 dated 30 September 2021 valid until 30 September 2024.</p> <p><u>Pangkalan Estate</u></p> <p>P2K3 Pangkatan Estate has been formed and has an endorsement/approval from Manpower Office Sumatera Utara Province</p>	
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		<p>according to Surat keputusan Kepala UPT Pengawasan Ketenagakerjaan Wilayah IV Dinas Tenaga Kerja Provinsi Sumatera Utara Nomor : KEP.387-7/P2K3/WIL-IV/DTK/SU/2021 tentang Pengesahan Panitia Pembina Keselamatan dan Kesehatan Kerja di Perusahaan” dated 17 Juni 2021. Safety Officer or “Ahli K3 Umum” OSH expert was assigned as P2K3 secretary. Safety Officer on behalf M. Danu Utomo has a license from Ministry of Manpower with licence Number No. Reg.97900/PK3/AJ/12/2021/P0 dated 10 May 2021 and valid until 10 May 2024.</p>	
6.7.2	<p>Accident and emergency procedures in Indonesian language are in place and clearly understood by all workers. Assigned operatives trained in first aid are present in both field and other operations. First aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p>	<p>There were established several documented procedures related to accident and emergency procedure in local language Bahasa Indonesia. Accident and emergency procedures no. AA-EMS-446-PR (operation control), AA-EMS-447-PR (Emergency preparedness), AA-EMS-001-FM (Emergency plan), AA-EMS-003-FM (Emergency incident), and AA-EMS-004-FM (Emergency incident Reporting).</p> <p>According to the emergency procedure, the emergency conditions have been identified including Fire and explosion at buildings; land fire; earthquake; flooding; chemical spill and poisonings also waste water ponds spillage. The procedures described the roles and responsibilities of each emergency response team include the mechanism how to conduct medical evacuation to near hospital/local health centre, the emergency contact number of each internal emergency team and external related parties such as public fire station at local area Kabupaten Labuhan Batu and Public health centre were also available.</p> <p>Company has formed the emergency response team as per “Struktur Organisasi Tanggap Darurat”. During audit can be demonstrated emergency response team for Tanjung Selamat POM, Tanjung Selamat Estate and Pangkatan Estate. Emergency response team has conducted the regular training to response the emergency situation, sample seen: Basic Fire training on 28 February 2023.</p>	Complied

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		<p>Emergency drill has been conducted each year, latest emergency drill for land fire conducted on 3 March 2023 for Tanjung Selamat Estate and Tanjung Selamat POM and on 28 February 2023 in Pangkatan Estate. Evidence of emergency drill can be demonstrated during audit including Scenario and minutes of emergency drill as per "Pengujian Kesiagaan Tanggap Darurat".</p> <p>PT Indo Sepadan Jaya and PT Rantau Sinar Karsa has appointed the licenced First Aider which is Foreman in each department/Afdeling. First aid training has been carried out by company, sample seen: First aid training for field foreman (Tanjung Selamat mill, Tanjung Selamat Estate and Pangkatan Estate) on 30 march 2023 attended by 26 field foreman; First aid training deliver by company doctor and paramedic.</p> <p>First aid equipment are available in the worksite both in Tanjung Selamat POM, Tanjung Selamat Estate and Pangkatan Estate. Sample seen:</p> <ul style="list-style-type: none"> - At Tanjung Selamat POM, there are 12 first aid equipment available at Security Pos, Office, Laboratory, Warehouse, Workshop, Mill operation office, Clarification station, Engine Room station, Boiler station, Water Treatment plant, Press Station, Sterilizer station, Hazardous waste storage. - At Tanjung Selamat Estate, first id equipment are available in the office, childcare, workshop, warehouse and each field foreman Afdeling I – IV with total first aid equipment 30 unit. - At Pangkatan Estate, there are 40 first aid equipment are available in office, childcare, workshop, warehouse and each field foreman. <p>Record of accident are available in "Laporan kecelakaan Kerja" Tanjung Selamat POM, Tanjung Selamat Estate and Pangkatan Estate. Report of accident period January – December 2023 are available. Each accident case were followed up by investigation as record in "Rekaman Kecelakaan Kerja" woch explain the detail of accident case, rootcause analysis and follow up action.</p>	
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		Accident report are review in regular basis each month through P2K3 meeting. Record of P2K3 meeting can be demonstrated during audit, sample seen: P2K3 meeting 22 March 2023.	
6.7.3	(C) Workers use appropriate personal protective equipment (PPE) which is provided free of charge to all workers in the workplace, to cover all potentially hazardous operations, such as pesticides application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.	<p>PT Indo Sepadan Jaya – Tanjung Selamat POM and Supply bases has demonstrated the record of realization the OHS program 2022/2023 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. Evidence of PPE provision and handover to workers can be shown during audit in " <i>Tanda Terima APD</i>". During field visit and interview to Tanjung Selamat POM, Tanjung Selamat Estate and Pangkatan Estate it was sighted that all workers has use appropriate PPE during working and they explained that PPE is provided free of charge, when the PPE is broken because of the working usage workers can request to change for the new PPE.</p> <p>Tanjung Selamat Estate and Pangkatan Estate has provide sanitation facilities for spraying operator, so that workers can change out of PPE, wash and put on their personal clothing. Sanitation facilities provide in area of Agrochemical warehouse with separate place.</p> <p>Based on field visit to Tanjung Selamat Estate and Pangkatan Estate can be demonstrated that sanitation facilities are well function and sufficient for spraying workers.</p>	Complied
6.7.4	All workers are provided medical care and covered by accident insurance. Costs incurred from work related incidents, leading to injury or illness, are covered in accordance with applicable regulations or by the unit of certification if applicable regulations do not provide protection.	<p>All workers have been provided with medical care and accident insurance (BPJS Ketenagakerjaan & BPJS Kesehatan).</p> <p>The insurances were still valid as seen by the recent slip payment in January – December 2022 and January – April 2023 for estate and mill. Several insurance payments are reviewed and are in accordance with the number of workers. For example, auditor has verified the BPJS Ketenagakerjaan (Accident and pension insurance) and Kesehatan receipt of payments period of April 2023 for total of 104 workers from</p>	Complied

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		<p>Tanjung Selamat POM, 679 workers from Tanjung Selamat Estate and 354 workers from Pangkatan Estate.</p> <p>Based on interview with sampled worker during the field visit in estate and mill, the affected workers received appropriate medical treatment from the insurance policy.</p>	
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	<p>PT Indo Sepadan Jaya EHS team prepares safety index. The safety index is monitoring tool, indicating number of worker (at each operating units), number of major and minor accident as well as the lost time injury.</p> <p>The monitoring carried out on monthly basis and results were discussed during safety committee meeting. The incident statistics include man-hours, lost time accident and Frequency rate (FR) and Severity rate (SR) were reported quarterly as P2K3 report by safety officer to Manpower office, sample seen: P2K3 report period January – March 2023 Tanjung Selamat POM and Estate reported on April 2023.</p> <p>In Tanjung Selamat POM Tanjung Selamat Estate and Pangkatan Estate there is a record of accident report and incident statistics include man-hours, lost time accident and Frequency rate (FR) and Severity rate (SR) were made by safety officer (Ahli K3):</p> <ul style="list-style-type: none"> - Tanjung Selamat Estate: During 2022 there were 3 accident occur with category first aid and 1 accident category medical aid with lost time injury 5 mandays, frequency rate 1 and severity rate 3.39 (days). - Pangkatan Estate During 2022 there were 1 accident occur with category first aid and no lost time injury, frequency rate 1 and saverity rate 0. <p>Tanjung Selamat POM: During 2022 there were 2 accident occur with category Medical aid and 4 nearmiss, lost time injury 28 mandays, frequency rate 11; Severity rate 151.2.</p>	Complied

Principle 7: Protect the environment, conserve biodiversity and ensure sustainable management of natural resources.			
Criteria 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.			
7.1.1	(C) IPM plans are implemented and monitored to ensure effective pest control.	<p>Based on document review during ASA1.2, it was known that Integrated Pest Management (IPM) was implemented and documented in related records, e.g. <i>"Monitoring Pengendalian Hama UPDKS March 2023"</i>, <i>"Rekap Serangan Hama dan Penyakit"</i>, Pest Census Summary form B2 (Ulat Api & Ulat Kantong), <i>"Data Titik Sensus Ulat Api"</i>, <i>"Ringkasan Sensus Hama Tikus"</i>, <i>"Sensus Kandang Burung Hantu"</i>, <i>"Formulir A4 Sensus Burung Hantu"</i>.</p> <p>Summary of IPM in Tanjung Selamat Estate period March 2023; attack of <i>Setora nitens</i> above APK is 12 Ha, average 10 caterpillar/frond; below APK is 221 Ha, average 4 caterpillar/frond. Control being done using fogger. No new infested <i>Oryctes</i> found; controlled using <i>Lamda sihalotrin</i> 1% in monthly intervals. No new infested <i>Molusca</i> found; controlled using <i>Sibutox</i> 10 gr/palm in monthly intervals. Termite infestation found based on "Deteksi dan Pengendalian Hama Rayap" period January 2023, there was 1,112 palms controlled. Control has been done on infested palms and isolation using <i>Fipronil</i> at dosage 1,5 cc/liter water.</p> <p>Detection and census of <i>Ganoderma</i>, conducted by 4 rounds in a year. Control done by felling manually, chopping and making hole 1,5 m x 1,5 m x 1 m. Based on <i>Ganoderma</i> census period February 2023, there was 11 palms felled in Div. 3.</p> <p>Program and Progress of Host Plant upkeep; interpolation done to replace dead palms. Watering program for newly planted host plants until they are 1 month old. Weeding / spraying is carried out with a target of once every 2 months. Compound fertilization 15:15:6:4 at a dose of 5 gr/palms at the age of 3 and 6 months after planting.</p>	Complied

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		Tanjung Selamat and Pangkatan Estate has implemented biological control to minimize or eliminate pest and disease, e.g. by use of barn owl and planting beneficial plants such as <i>Casia sp.</i> , <i>Antigonon leptopus</i> and <i>Turnera subulatta</i> .	
7.1.2	Invasive species are not to be used according to applicable regulation in managed areas, unless plans to prevent and monitor their spread are implemented.	<p>Based on document review during ASA1.2, it was known that Inventory and identification of invasive species in the Tanjung Selamat and Pangkatan Estate has been done according to the List listed in the regulation "Minister of Environment and Forestry Regulation No. P.94/MENLHK/SEKJEN/KUM.1/12/2016".</p> <p>The unit of certification has a list of existing invasive species and evaluate the status of control in certified area on 1 January 2023 in Tanjung Selamat Estate and Pangkatan Estate. Some species are naturally existing in the area and the spreading are controlled manually, e.g. <i>Clidemia hirta</i>, <i>Imperata cylindrica</i> and <i>Mikania micranta</i>. The are no species in the list that used to manage areas in unit of certification.</p> <p>Activity of inventory and identification of Invasive Species has been included into the Conservation Management Plan to be periodically carried out.</p>	Complied
7.1.3	There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities.	Based on field visit, document review, interview to the stakeholders during ASA1.2, it was known that there is no use of fire for pest control in whole area of Tanjung Selamat and Pangkatan Estate.	Complied
Criteria 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.			
7.2.1	(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.	<p>Based on document review during ASA1.2, it was known that Justification of pesticide used is explained under company procedure of weed control - "SOP Pengendalian Gulma No. AA-APM-OP-11100.08-R1" dated 1 November 2008.</p> <p>Chapter IV explains the weed control program for woody, grass, fern, caladium, wild banana (<i>Musa Sp</i>), <i>Asystasia</i>, etc. It does explain active</p>	Complied

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		<p>ingredients use to control such weed, dosage per application, type of nozzle used and volume of spraying per application.</p> <p>Chapter V explains selection of pesticide and its active ingredients content, nature of the pesticide and target species.</p> <p>Chapter VII describes calculation of actual area implemented per hectare plantation (spray factor), spraying rotation and spraying output.</p> <p>Spraying works were conducted by selected spraying on specific target, for example weeds spraying on circle, path and TPH (FFB Collecting Point), other areas beside specific area were not applied, Riparian area along the river are prohibits to be performed spraying to minimize and reduce the negative environmental impact to the river and ecosystem. Field visit for pesticides application has carried out in Block A7 Afd 3 Tanjung Selamat Estate and Block C9 Afd 3 Pangkatan Estate.</p> <p>Pesticide and herbicide used by company was registered in the book of pesticides - "Komisi Pestisida" and has permit from government.</p>	
7.2.2	<p>(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per Ha and number of applications) are provided.</p>	<p>The company has recorded list of herbicides used, completed with active ingredient, LD50, WHO class, trademark, target, registration number and expiry date.</p> <p>Type, volume used and volume per Ha of pesticide in Tanjung Selamat Estate and Pangkatan Estate periode January – December 2022 can be shown during audit.</p> <p>Pesticide and herbicide use by Tanjung Selamat and Pangkatan Estate:</p> <ul style="list-style-type: none"> - Polydor - Metsulindo - Dithane M-45 80WP - Regent 50SC - Lindomin 865AS - Thuricide 	Complied

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		<ul style="list-style-type: none"> - Kenlon 480 EC - Nordox 86 WG - Argonil 75WP - Elang 480 AS - Supremo 480 SL - Kenrane 288EC - Basta 150 SL - Gulmaron 80WP 	
7.2.3	(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.	Based on result of interview to the management, the use of pesticide are minimized as part of the plan, and in accordance with IPM Plans, there are no pesticide application outside of the targeted species and planned intervals. Pesticide is only used to reduce / eliminate existing pest, which has exceeded the economic threshold. It also evident that in controlling pest, the unit of certification committed to always reduce pesticide usage and give priority to the prevention of mechanical, biological and integrated pest management.	Complied
7.2.4	There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in Indonesia best practice guidelines.	The company use fipronil as prophylactic control of termite, the prophylactic use fipronil are described in SOP of Pest and Disease Control (AA-APM-OP- 1100.10-R3) Section 8.5 Control of Termite. Fipronil is a WHO class II insecticide. It described that for prophylactic, 6 palms around infested palm is applied 3 liter insecticide on ground with 30 cm radius.	Complied
7.2.5	Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat, are not to be used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks. The due diligence refers to:	There are no pesticides that categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat used by the unit of certification.	Complied

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	7.2.5a Judgment of the threat and verify why this is a major threat.		
	7.2.5b Why there is no other alternative which can be used.	<p>During this 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 recertification audit there is no revision of the SOP.</p> <p>Company no longer using <i>paraquat diklorida</i> since November 2019.</p>	
	7.2.5c Which process was applied to verify why there is no other less hazardous alternative.	<p>Certificate holder through Asian Agri's Research and Development Department has examined some pesticide in specific target. The result of examination and pesticide recommendation written in the SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i> (Weed Control). During this recertification audit there is no revision of the SOP.</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>	
	7.2.5d Process to limit the negative impacts of the application.	<p>SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i> (Weed Control) has set some procedures to reduce negative impact of the application as follows:</p> <ul style="list-style-type: none"> • Pesticide/herbicide selection to ensuring the application is effective. 	

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		<ul style="list-style-type: none"> • Set up the appropriate nozzle in chemical weeding activity based on weed type, topography and availability of water. • Regularly spraying calibration to ensuring the application is effective and efficient. • Calculate pesticide/herbicide usage based on target (hectarage and weed type). • Spraying technic. <p>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>	
	7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.	<p>Certificate holder did not use pesticide to 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>	
7.2.6	(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they conduct.	<p>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). They regularly attended training on pesticide handling that conducted by the pesticide supplier in collaboration with local pesticide committee. Training for pesticides applicator uses was delivered on 19 April 2019 by</p>	Complied

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		<p>PT Syngenta Indonesia. refreshment training for SOP and WI regarding spraying work was conducted on 1 March 2023. Training covered handling of agrochemical concentrate and spraying method including pesticide hazard and use of PPE.</p> <p>Application of pesticides was following SOP of Pesticides Management – “Pestisida dan Pengelolaannya” (AA-APM-OP-1100.11-R1) Chapter III point 3.2 which stated that pesticide operator must be fit, not in pregnancy or breast feeding, must have meal before work, and uses appropriate PPE.</p> <p>Spraying team using sign board indicating spraying/herbicide application is in progress for a block. Spraying supervisor was pre- mixing the herbicide in the chemical warehouse, transport the mixed chemical via truck, using cone and spill tray on the field to minimize spillage. The type and dosage of herbicide are carefully measured and prepared for targeted weed control; circle and path spray or selective weeding (wooden, bracken, or VOP). Nozzle calibration conducted regularly and recorded – evident.</p> <p>Sprayers and spraying supervisor are trained with best management practice for weed control, spraying techniques, using PPE and received regular medical check-up. Clean water and soap on the field are provided for sprayer. Supervisor was equipped with first aid kit.</p> <p>Appropriate PPE has been provided by company and used by spraying workers such as: Apron, leather and rubber hand gloves, respiratory masker, safety goggles, head cover and rubber boot.</p>	
7.2.7	(C) Storage of all pesticides in accordance with recognized best practices.	<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>Pesticide storage is provided in Divisions as well as in central storage. Agrochemical storage is locked areas with limited access. The storage is</p>	Complied

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		<p>ventilated. MSDS and hazard symbol label are provided nearby of pesticides. Emergency shower and eyewash are also provided to anticipate in case of an emergency of agrochemical handling. PPE for handling of pesticides provided including boots, apron, safety glass, respiratory mask and hand gloves.</p> <p>The possible spillage is managed. Secondary containment is provided around the pesticide storage area. Spill kit is also provided in the area.</p> <p>During field visit storage of pesticides found to be in accordance with hazard identification and risk assessment and national guideline for limited pesticide use. Empty chemical containers had been used for mixing chemicals for spraying pesticides in the field. The management of waste material from empty pesticide container disposed through hazardous waste store as per procedure "Penanganan Limbah Industri B-3 AA-KL-06-EFP" dated 1 November 2008.</p> <p>The company has temporary hazardous waste storage where all hazardous waste from all estates and mills collected.</p>	
7.2.8	All pesticide containers that are disposed of and/or used for other purposes are managed according to applicable regulations and/or instructions on the packaging.	<p>SOP for proper disposal of pesticide waste material was described in "Penanganan Limbah Industri B-3 AA-KL-06-EFP" dated 1 November 2008. Pesticide waste was reuse as mixing water for the next spraying activity. All empty pesticides containers were triple rinsed and stored in the temporary storage of hazardous wastes.</p> <p>The management of waste material from empty pesticide container disposed through licenced hazardous waste storage according to the procedure. The company has licensed temporary hazardous waste storage where all empty pesticide containers from agrochemical storage collected. Licenced based on "Keputusan Kepala Dinas Penanaman Modal dan Pelayanan Terpadu Satu Pintu Kabupaten labuhan Batu Nomor: 503.660.3/556/DPMPPTSP-BP2MNP/2019 Tentang Pemberian Izin Pengelolaan Limbah B3 Untuk Kegiatan Penyimpanan Limbah B3 kepada PT ISJ" valid for 5 years.</p>	Complied

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		Record of hazardous waste coming in and coming out are available in "Neraca Limbah B3". Personnel interviewed can clearly explain the mechanism of pesticide waste handling including MSDS and personal protective equipment as well as first aid.	
7.2.9	(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.	Based on interview with Estate Management, surrounding community and field observation, there was no pesticide applied aerially in PT Indo Sepadan Jaya – Tanjung Selamat Estate and PT Rantau Sinar Karsa – Pangkatan Estate.	Not Applicable
7.2.10	(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.	Annual medical check-up was conducted for all workers handling with chemical, such as pesticide, herbicide, and fertilizer. The latest medical check-up performed on 2 February 2023 – location in at company medical healthcare by Pramitha Laboratory attended by workers of fertilizer applicators, spraying applicator and PIC in pesticides storage (204 workers Tanjung Selamat Estate and 176 workers of Angkatann Estate). The result of MCU has communicated to related workers according to "Berita Acara Sosialisasi MCU".	Complied
7.2.11	(C) No pesticide-related work is carried out by pregnant or breastfeeding women, or people with medical limitations and they are offered other equivalent work alternatives.	PT Indo Sepadan Jaya and PT Rantau Sinar Karsa prohibits pregnant or breast-feeding women to perform chemical spraying. To mitigate, estate performed monthly pregnancy test. PT Indo Sepadan Jaya and PT Rantau Sinar Karsa 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. The latest of pregnancy test conducted on May 2023. All the female sprayer in well condition and not being pregnant nor breast feeding.	Complied

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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.

7.3.1	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented in accordance with applicable laws and regulations.	<p>PT Indo Sepadan Jaya has shown the document of waste management plan under "Evaluasi Aspek Dampak Lingkungan" nomor: EMS-431-003-LT latest review on January 2023. The identification of waste and pollution sources 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.</p> <p>Hazardous and medical waste is disposed to the register collectors while domestic waste disposed to the landfill, organic and an organic waste is separate in line site, organic waste to the landfill and some of inorganic waste is collected for re-cycle.</p> <p>PT Indo Sepadan Jaya has also established the procedure to manage the waste generated from all activity, such as:</p> <ul style="list-style-type: none"> - Procedure AA-KL-05-EFP, procedure of non-hazardous waste handling covering: mill water (used rail, used part, ex chemical non-hazardous/toxic, EFB, fiber, shell), estate waste (used polybag, ex fertilizer sack), office waste (used paper, used work equipment), Workshop waste (used hose, used drum, scraped/used parts, used tire), power generator waste (used hose, used parts, scarped), Logistic waste (ex-fertilizer sack, used drum). - Procedure AA-KL-11-EFP, procedure of laboratory waste handling. - Procedure to utilize the fiber and shell (solid waste) as a boiler fuel SOP No. AA-MPM-OP-1400.04-R1 "Pemanfaatan fiber untuk bahan bakar". 	Complied
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		<ul style="list-style-type: none"> - EFB (Empty Fruit Bunch) utilization as a mulching or organic fertilizer according to SOP Pemupukan AA-APM-OP-1100.09-R1. <p>PT Indo Sepadan Jaya has a licence for hazardous waste storage based on "Keputusan Kepala Dinas Penanaman Modal dan Pelayanan Terpadu Satu Pintu Kabupaten labuhan Batu Nomor: 503.660.3/556/DPMPTSP-BP2MNP/2019 Tentang Pemberian Izin Pengelolaan Limbah B3 Untuk Kegiatan Penyimpanan Limbah B3 kepada PT ISJ" valid for 5 years.</p>	
7.3.2	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.	<p>PT Indo Sepadan Jaya dan PT Rantau Sinar Karsa has a waste management plan, identifying type and source of waste and the disposal plan. PT Indo Sepadan Jaya dan PT Rantau Sinar Karsa prepared a procedure to handle hazardous waste titled "Prosedur Penanganan Limbah B3" No.AA-KL-06-EFP explains methods to collecting the waste, recording in balance and disposal through licensed third party transporter.</p> <p>The company store hazardous waste in temporary storage with permit, The hazardous waste is sent to the registered collector/transporter which approved by Environmental Ministry, namely PT Indostar Cargo.</p> <p>Based on interview with workers who are handling of pesticides that they understood of disposed empty containers pesticides, such as: Empty chemical containers re-used only for mixing purposes, unusable are triple rinsed, punctured and disposed to the approval collector.</p>	Complied
7.3.3	The unit of certification does not use open fire for waste disposal.	<p>All waste products has been identified and documented under the "Evaluasi Aspek- Dampak Lingkungan" (Environmental Aspect impacts). Domestic waste is the main concern to be manage. Both Mill and Estate, has periodically schedule to manage the domestic waste. Regulation of domestic waste management refer to "UU No. 18 Tahun 2008 tentang Pengelolaan Sampah". PT Indo Sepadan Jaya and PT Rantau Sinar karsa has provide landfill for domestic waste. During field visit to landfill area at Tanjung Selamat Estate and Pangkatan Estate shown that landfill area</p>	Complied

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		<p>has well managed and domestic waste handling in accordance with procedure and regulation.</p> <p>There is no open fire for waste disposal. PT Indo Sepadan Jaya also has a policy of Zero burning.</p>	
Criteria 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	Good agricultural practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts is documented.	<p>The unit of certification has established procedure soil fertility in "SOP AA-APM-OP-1100.09. R1" - SOP Pemupukan, consist of type and recommendation of fertilizer for immature and mature areas, cycle, dosage and when fertilizer is applied. The company has applied management strategy to maintain soil fertility according to the procedure. Manuring was performed manually with spreading the fertilizer by person uniformly in each palm oil trees in accordance with dosage which has defined by Research and Development recommendation.</p> <p>There is no change related to the SOP until ASA1.2 audit.</p> <p>Fertilizers were applied to maintain and increase soil fertility, fertilizer applied in accordance to the fertilizer recommendation which created based on soil and leaf analysis. Records of fertilizer application in Tanjung Selamat and Pangkatan Estate 2022/2023 as well as recommendation are available in "Fertilizer Application and Recommendation 2021/2022".</p>	Complied
7.4.2	Analysis of tissue samples (e.g. leaves) and soil on a regular basis to monitor and manage changes in soil fertility and plant health is documented.	<p>Based on document review during ASA1.2, it was known that analysis of tissue samples was implemented. Records of periodical leaf sampling and visual analysis were available. Foliar Analysis Report shows that leaf sampling and analysis has been done recently in July 2022. The result has been used to develop fertilizer recommendation of Y2023.</p> <p>For Tanjung Selamat Estate, it was shown "Foliar Analysis Report" PT Indo Sepadan Jaya – Tanjung Selamat Estate as per Laboratory Report No. /INT/R&D/JUL/L/22 dated 18 July 2022 by R&D PT Nusa Pusaka</p>	Complied

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		<p>Kencana Analytical & QC Laboratory, total sample 19 and Laboratory Report No. /INT/R&D/JUL/L/22 dated 18 July 2022, total samples 22. And For Pangkatan Estate as per Laboratory Report No. /INT/R&D/JUL/L/22 dated 18 July 2022, total samples 15.</p> <p>Evidence of soil analysis was shown on as per Laboratory Report No. 02/RD-NT/S/AGT/19 dated 13 August 2019 by R&D PT Nusa Pusaka Kencana Analytical & QC Laboratory, Tanjung Selamat Estate, total samples 18.</p> <p>Evidence of soil analysis was shown on as per Laboratory Report No. 041/RD-NT/S/AGT/19 dated 13 August 2019 by R&D PT Nusa Pusaka Kencana Analytical & QC Laboratory, Pangkatan Estate, total samples 17.</p>							
7.4.3	A nutrient recycling strategy is in place, which include the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.	Nutrient recycling strategy performed by application of bunch ash. In 2022 it was applied 570,000 kg of bunch ash from budget 650,000 kg in Tanjung Selamat Estate. There is no application EFB and POME in Tanjung Selamat and Pangkatan Estate since the plantation area is peat.	Complied						
7.4.4	Records of fertilizer inputs are maintained.	<p>During ASA1.2 it was known that all fertilizer input recorded in "Laporan Unit Kebun (LUK)", a monthly report covers all of upkeep activities. Below are record of recommendation and realization of fertilizer in Tanjung Selamat Estate and Pangkatan Estate</p> <p>Y2022 Tanjung Selamat Estate</p> <table border="1"> <thead> <tr> <th>Type Fertilizer</th> <th>of Recommendation (Kg)</th> <th>Actual (Kg)</th> </tr> </thead> <tbody> <tr> <td>UREA</td> <td>886,102</td> <td>767,014</td> </tr> </tbody> </table>	Type Fertilizer	of Recommendation (Kg)	Actual (Kg)	UREA	886,102	767,014	Complied
Type Fertilizer	of Recommendation (Kg)	Actual (Kg)							
UREA	886,102	767,014							

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		<table border="1"> <tbody> <tr> <td>RP</td> <td>530,954</td> <td>492,851</td> </tr> <tr> <td>MOP</td> <td>1,960,593</td> <td>1,825,425</td> </tr> <tr> <td>Dolomite</td> <td>1,071,034</td> <td>1,063,862</td> </tr> <tr> <td>HGFB</td> <td>84,133</td> <td>70,879</td> </tr> <tr> <td>Mix CuZn</td> <td>47,977</td> <td>47,613</td> </tr> <tr> <td>Bunch Ash</td> <td>1,840,071</td> <td>1,228,803</td> </tr> </tbody> </table> <p>Y2023 (until April)</p> <p>Tanjung Selamat Estate</p> <table border="1"> <thead> <tr> <th>Type of Fertilizer</th> <th>Recommendation (Kg)</th> <th>Actual (Kg)</th> </tr> </thead> <tbody> <tr> <td>UREA</td> <td>1,057,256</td> <td>539,439</td> </tr> <tr> <td>RP</td> <td>524,122</td> <td>524,122</td> </tr> <tr> <td>MOP</td> <td>2,411,395</td> <td>1,153,110</td> </tr> <tr> <td>Dolomite</td> <td>1,135,618</td> <td>424,463</td> </tr> <tr> <td>HGFB</td> <td>93,598</td> <td>43,017</td> </tr> <tr> <td>Mix CuZn</td> <td>47,519</td> <td>47,519</td> </tr> <tr> <td>Bunch Ash</td> <td>828,483</td> <td>251,348</td> </tr> </tbody> </table>	RP	530,954	492,851	MOP	1,960,593	1,825,425	Dolomite	1,071,034	1,063,862	HGFB	84,133	70,879	Mix CuZn	47,977	47,613	Bunch Ash	1,840,071	1,228,803	Type of Fertilizer	Recommendation (Kg)	Actual (Kg)	UREA	1,057,256	539,439	RP	524,122	524,122	MOP	2,411,395	1,153,110	Dolomite	1,135,618	424,463	HGFB	93,598	43,017	Mix CuZn	47,519	47,519	Bunch Ash	828,483	251,348	
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Criteria 7.5: Practices minimise and control erosion and degradation of soils.																																													
7.5.1	(C) Maps that identify marginal and fragile soils, including steep sloped land are available.	<p>Tanjung Selamat Estate:</p> <p>Map of peat soil is available in place with scale 1 : 20.000, including:</p> <ol style="list-style-type: none"> 1. Peta Kerja Kebun Tanjung Selamat, contained block number, 	Complied																																										

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		<p>Afdeling, hectares, road, river and housing complex.</p> <ol style="list-style-type: none"> 2. Peta Citra Landsat year 2002. 3. Elevation Map; contain 0 – 8% (3.855 ha) 4. Topography Map; contain 2.5 – 12.5 m above sea level 5. Soil and Suitability Map; <ol style="list-style-type: none"> a. Peat < 1 meter: 1.602 ha b. Peat 1 – 3 meter: 2.101 ha c. Peat > 3 meter: 152 ha <p>Total: 3,855 ha</p> 6. Soil Serial Map <p>There is no change related to the peat soil map until ASA1.2</p> <p>Pangkalan Estate:</p> <p>Peta Citra Landsat 7 ETM, path 128, raw: 058, PT Rantau Sinar Karsa Kebun Pangkatan, year 2002, scale 1:20.000</p> <p>Soil Serial Map, covers 3,855 ha, scale 1:20.000:</p> <ul style="list-style-type: none"> - Typic Endoaquults Pangkatan Series. - Sapric Haplohemists Pangkatan Series. - Typic Haplohemist Pangkatan Series. <p>Soil Suitability Map, scale 1:20.000;</p> <ul style="list-style-type: none"> - Typic Endoaquults – Slope: 0-3% (856 ha) - Typic Haplohemist, Peat < 1 m; Slope 0-3% (746 ha) - Sapric Haplohemist, Peat 1 - 3 m; Slope: 0-3% (2,101 ha) - Sapric Haplohemist, Peat > 3m; Slope 0-3% (152 ha) <p>Marginal Suitable Area (S3): ± 746 ha (19,4%)</p> <p>Unsuitable Area with Condition (N1): ± 3,109 ha (80,6%).</p>	
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		There is no change related to the peat soil map until ASA1.2	
7.5.2	The replanting of palm oil is not conducted extensively on steep terrain in accordance with applicable regulations.	Based on elevation map, there is no steep terrain in Tanjung Selamat and Pangkatan Estate, therefore there is no replanting in steep terrain. It was also confirmed during field visit to Tanjung Selamat Estate and pangkatan Estate during ASA1.2.	Complied
7.5.3	New palm oil planting is not conducted on steep terrain in accordance with applicable regulations.	Based on elevation map, there is no steep terrain in Tanjung Selamat and Pangkatan Estate, therefore there is no replanting in steep terrain. It was also confirmed during field visit to Tanjung Selamat Estate and pangkatan Estate during ASA1.2.	Complied
Criteria 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.			
7.6.1	(C) Evidence of long-term land suitability for oil palm cultivation, soil maps or soil surveys that identify marginal and fragile soils, including steep terrain are available, in planning and operations.	<p>In this 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> <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 >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>Tanjung Selamat Estate:</p> <p>Map of peat soil is available in place with scale 1 : 20.000, including:</p> <ul style="list-style-type: none"> – Peta Kerja Kebun Tanjung Selamat, contained block number, Afdeling, hectares, road, river and housing complex. – Peta Citra Landsat year 2002. – Elevation Map; contain 0 – 8% (3,855 ha) – Topography Map; contain 2.5 – 12.5 m above sea level 	Complied

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		<ul style="list-style-type: none"> - Soil and Suitability Map; <ul style="list-style-type: none"> a. Peat < 1 meter: 1,602 ha b. Peat 1 – 3 meter: 2,101 ha c. Peat > 3 meter: 152 ha <p style="margin-left: 40px;">Total: 3,855 ha</p> - Soil Serial Map <p>Pangkalan Estate:</p> <ul style="list-style-type: none"> - Peta Citra Landsat 7 ETM, path 128, raw: 058, PT Rantau Sinar Karsa Kebun Pangkatan, year 2002, scale 1:20.000 - Soil Serial Map, covers 3,855 ha, scale 1:20.000 <ul style="list-style-type: none"> o Typic Endoaquults Pangkatan Series. o Sapric Haplohemists Pangkatan Series. o Typic Haplohemist Pangkatan Series. - Soil Suitability Map, scale 1:20.000; <ul style="list-style-type: none"> o Typic Endoaquults – Slope: 0-3% (856 ha) o Typic Haplohemist, Peat < 1 m; Slope 0-3% (746 ha) o Sapric Haplohemist, Peat 1 - 3 m; Slope: 0-3% (2,101 ha) o Sapric Haplohemist, Peat > 3m; Slope 0-3% (152 ha) o Marginal Suitable Area (S3): ± 746 ha (19.4%) o Unsuitable Area with Condition (N1): ± 3,109 ha (80.6%) - Elevation Map, scale 1:20.000; Flat (0 - 8%): 3,855 ha. <p>necessary drainage for oil palm growing has been conducted and documented in "<i>Studi Drainase Di Areal Gambut Kebun Pangkatan PT Rantau Sinar Karsa (RSK), April 2016.</i>"</p> <p>The conclusions from this study are as follows:</p> <ul style="list-style-type: none"> - Pangkatan Estate elevation ranges from 6 to 13 m asl, and it is 	
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		<p>above the merbau river with the lowest contour height is 1.3 m.</p> <ul style="list-style-type: none"> - The actual drainage class in general is S-3 which means that water excess can be released when the Merbau River water level is at the lowest level (LWL). - Pangkatan Estate has a vary peat depth from 1 to > 3 m with good maturity level (saprik). <p>Minimum economic life span of peatlands in Pangkatan Estate is about 74.6 years and may change according to land management and drainage system.</p> <p>Drainability Assessment in Tanjung Selamat Estate has been conducted and documented in "<i>Laporan Studi Drainase Di Areal Gambut Kebun Tanjung Selamat PT. Indo Sepadan Jaya, Maret 2017</i>".</p> <p>The conclusions from this study are as follows:</p> <ul style="list-style-type: none"> - Elevation range at Pangkatan Estate are 7 – 11 m asl, and it is above Kalundang river with the lowest contour 7.6 m. - The actual drainage class at Tanjung Selamat Estate in general is S-2 which means that water excess can be released when the Kalundang River water level is at the middle level (MWL) to lowest level (LWL). - Tanjung Selamat Estate has a vary peat depth from 1 to > 3 m with middle - good maturity level (hemik - saprik). <p>Minimum economic life span of peatlands at Tanjung Selamat Estate is about 103.3 years (4 planting period) and may change according to land management and drainage system.</p> <p>There is no change related to Drainability Assessment until ASA1.2.</p>	
7.6.2	Extensive planting on marginal and fragile soils is avoided or, if necessary, carried out according to the best-practice soil management plan.	There is no extensive planting conducted by unit of certification. Currently the whole area is replanting. The youngest planting in Tanjung Selamat Estate is 2017 and in Pangkatan Estate is 2020.	Complied

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7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	Map of soil based on soil survey as described in indicator 7.6.1 has been used to guide drainage and irrigation system, roads and other infrastructure.	Complied																																				
Criteria 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.																																							
7.7.1	(C) No new planting on peatlands, regardless of depth, after 15 November 2018, in existing plantation areas, as well as in new development areas.	There is no new planting process performed by the unit of certification.	Complied																																				
7.7.2	Peat areas within the managed area are inventoried, documented and reported to the RSPO Secretariat (effective from November 15, 2018).	The unit of certification has inventoried and documented peat areas within the managed area, the RSPO Peat Inventory document has been reported to RSPO Secretariat as evident in email to GHG unit of RSPO Secretariat on 14 November 2019. RSPO has acknowledge the report. Second submission of RSPO Peat Inventory has been submitted to RSPO on 1 Novemver 2023 and RSPO has acknowledge the report by email confirmation from RSPO on 8 November 2023.	Not Applicable																																				
PROCEDURAL NOTE: Maps and other documentation for peatlands are provided, prepared and shared according to the RSPO Working Group (Peatland Working Group / PLWG) audit guide (See Procedural Notes for Indicator 7.7.5 below).																																							
7.7.3	(C) Subsidence of peat is monitored, documented and minimised.	Subsidence of peat is monitored in the Peat Subsidence Measurement document. The following is an example of data for the period June - September and September - December 2022 in Tanjung Selamat Estate: <table border="1" style="margin-left: 20px;"> <thead> <tr> <th>Block</th> <th>Previous (cm)</th> <th>Recent (cm)</th> <th>Subsidence (cm)</th> </tr> </thead> <tbody> <tr> <td colspan="4">Period: Jun – Sep 2022</td> </tr> <tr> <td>A16f</td> <td>22.0</td> <td>22.0</td> <td>0</td> </tr> <tr> <td>B13j</td> <td>21.5</td> <td>21.5</td> <td>0</td> </tr> <tr> <td>C14i</td> <td>21.2</td> <td>21.2</td> <td>0</td> </tr> <tr> <td>D13g</td> <td>19.0</td> <td>19.0</td> <td>0</td> </tr> <tr> <td colspan="4">Period: Sep – Dec 2022</td> </tr> <tr> <td>A16f</td> <td>23</td> <td>23.0</td> <td>0</td> </tr> <tr> <td>B13j</td> <td>22</td> <td>22.0</td> <td>0</td> </tr> </tbody> </table>	Block	Previous (cm)	Recent (cm)	Subsidence (cm)	Period: Jun – Sep 2022				A16f	22.0	22.0	0	B13j	21.5	21.5	0	C14i	21.2	21.2	0	D13g	19.0	19.0	0	Period: Sep – Dec 2022				A16f	23	23.0	0	B13j	22	22.0	0	Complied
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7.7.4	<p>(C) Availability of implementation evidence of the water and land cover management program.</p>	<p>The unit of certification has documented water and ground cover management program and maintained records of monitoring subsidence of peat soils, i.e.:</p> <ul style="list-style-type: none"> – Water Level Monitoring, using water level pole. – Monitoring of Peat Subsidence, using peat subsidence pole. – Water Table Monitoring, using piezometer. <p>Monitoring of water level and water table performed twice in a month. During visit to water table at Block D13q Tanjung Selamat Estate, found that water table is 50 cm from surface. During visit to water table at Block A16f Pangkatan Estate, found that water table is 41 cm from surface.</p> <p>The total monitoring points for groundwater level are 19 points. Groundwater level regulation activities are documented in the document "Pemantauan Muka Air Tanah". The following is an example of Groundwater Level Monitoring for the period of December 2021:</p> <table border="1" data-bbox="1133 903 1877 1106"> <thead> <tr> <th>Block</th> <th>Date</th> <th>Ground Water Level (cm)</th> <th>Rainfall (mm)</th> </tr> </thead> <tbody> <tr> <td>A16f</td> <td rowspan="4">31/12/2022</td> <td>41</td> <td rowspan="4">109</td> </tr> <tr> <td>B13j</td> <td>43</td> </tr> <tr> <td>C14i</td> <td>47</td> </tr> <tr> <td>D13q</td> <td>50</td> </tr> </tbody> </table> <p>The following is a record of the ground water level in Pangkatan Estate, based on groundwater level report period December 2022.</p> <table border="1" data-bbox="1133 1227 1946 1394"> <thead> <tr> <th colspan="2">Monitoring Point</th> <th rowspan="2">Ground Water Level (cm)</th> </tr> <tr> <th>Latitude</th> <th>Longitude</th> </tr> </thead> <tbody> <tr> <td>2° 9' 12.58" N</td> <td>99° 59' 01.21" E</td> <td>36</td> </tr> <tr> <td>2° 11' 35.28" N</td> <td>99° 58' 35.76" E</td> <td>47</td> </tr> <tr> <td>2° 11' 36.76" N</td> <td>99° 59' 42.80" E</td> <td>40</td> </tr> </tbody> </table>	Block	Date	Ground Water Level (cm)	Rainfall (mm)	A16f	31/12/2022	41	109	B13j	43	C14i	47	D13q	50	Monitoring Point		Ground Water Level (cm)	Latitude	Longitude	2° 9' 12.58" N	99° 59' 01.21" E	36	2° 11' 35.28" N	99° 58' 35.76" E	47	2° 11' 36.76" N	99° 59' 42.80" E	40	Complied
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		2° 12' 42.84" N	99° 59' 51.18" E	53	
7.7.5	<p>(C) Drainability assessments are conducted for plantations planted on peat following the RSPO Drainability Assessment Procedure, or other method recognized by RSPO, (at least five years or in accordance with the provisions of the RSPO Drainability Assessment Procedure) before replanting. The results of the assessment are used to determine the period of replanting to be carried out, as well as to gradually replace oil palm cultivation for at least 40 years or two cycles, (whichever is longer), before reaching the natural gravitational drainage limit for peat. If oil palm is gradually replaced, it is replaced by other commodity crops that are better suited for higher groundwater levels (paludiculture) or rehabilitated with natural vegetation.</p>	<p>Based on document review during ASA1.2, the organization has conducted Drainability Assessment. Drainability Assessment to determine the long-term viability of the necessary drainage for oil palm growing has been conducted and documented in "<i>Studi Drainase Di Areal Gambut Kebun Pangkatan PT Rantau Sinar Karsa (RSK), April 2016</i>". Drainability assessment conducted by Research and Development department of company.</p> <p>The conclusions from this study are as follows:</p> <ol style="list-style-type: none"> 1. Pangkatan Estate elevation ranges from 6 to 13 m asl, and it is above the merbau river with the lowest contour height is 1.3 m. 2. The actual drainage class in general is S-3 which means that water excess can be released when the Merbau River water level is at the lowest level (LWL). 3. Pangkatan Estate has a vary peat depth from 1 to > 3 m with good maturity level (saprik). 4. Minimum economic life span of peatlands in Pangkatan Estate is about 74.6 years and may change according to land management and drainage system. <p>PT Rantau Sinar Karsa – Pangkatan Estate has performed re-assessment of drainability in January 2020 following the RSPO Drainability assessment procedure 2019 and Peat Restoration Policy (based on Decree of Direktorat Jenderal Pengendalian Pencemaran dan Kerusakan lingkungan", summary of the study as follow:</p> <ol style="list-style-type: none"> 1. The natural drainage limit of the Pangkatan Estate is 79 cm obtained from the average water level of the Merbau River in 2018-2019. 2. The largest depth of peat in the Pangkatan Estate is 5.9 m. 3. Pangkatan Estate elevation ranges from 1.3 to 6.5 m above the Merbau River. 	Complied		

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		<p>4. The rate of peat subsidence can be divided into 3 groups, namely shallow peat 0.7 cm/year, medium peat 1.7 cm/year and deep peat 3 cm/year.</p> <p>5. Pangkatan Estate reaches the natural drainage limit soonest after 53 years on block B18c, so that the deadline for replanting can be done in block B18c is 13 years.</p> <p>Drainability Assessment in Tanjung Selamat Estate also has been conducted and documented in "<i>Laporan Studi Drainase Di Areal Gambut Kebun Tanjung Selamat PT Indo Sepadan Jaya, March 2017</i>".</p> <p>The conclusions from this study are as follows:</p> <ol style="list-style-type: none"> 1. Elevation range at Pangkatan Estate are 7 – 11 m asl, and it is above Kalundang river with the lowest contour 7.6 m. 2. The actual drainage class at Tanjung Selamat Estate in general is S-2 which means that water excess can be released when the Kalundang River water level is at the middle level (MWL) to lowest level (LWL). 3. Tanjung Selamat Estate has a vary peat depth from 1 to > 3 m with middle - good maturity level (hemik - saprik). <p>Minimum economic life span of peatlands at Tanjung Selamat Estate is about 103.3 years (4 planting period) and may change according to land management and drainage system.</p> <p>Replanting program and activity in Pangkatan Estate has been done in 2020 and Tanjung Selamat Estate has been done in 2017 and there is no more replanting program and activity after 2020.</p>	
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PROCEDURAL NOTE: For 7.7.5: Detailed information on the RSPO Drainability Assessment Guide along with related concepts and detailed actions is contained in the Guidelines currently being adjusted / tested by the RSPO Working Group on Peatlands (Peatland Working Group / PLWG). The final version must obtain PLWG approval in January 2019 and will include additional Guide on the steps to be followed after deciding not to replant and the consequences for other stakeholders, farmers, local communities, and the unit of certification concerned. It is recommended that the trial methodology period is proposed to be extended for 12 months for all relevant management units (ie management units that have plantations on peat) to utilize the methodology and provide input to PLWG so that existing procedures can be further refined as needed before January 2020.

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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.			
7.7.6	<p>(C) All existing plantations on peat are managed according to applicable laws and/or "RSPO Guidelines for Best Management Practices (BMP) for Oil Palm Cultivation that are already on Peatlands", version 3 (June 2019) along with related audit guidelines (May 2019).</p>	<p>The unit of certification has established a procedure of Water Management AA-SOP-OP-1100.17-R1. Documented water management program to ensure that subsidence of peat soils is minimized and monitored has been established. There is sufficient evidence that the defined program was implemented. Water management procedure for peat land is implemented, the company has installed water gate, main drain gate, peat subsidence monitoring, and clean drainage regularly, also monitoring of water level and water table, main gate water level and peat subsidence level.</p> <p>There is no change related to the SOP until ASA1.2</p> <p>The organization has documented water and ground cover management program and maintained records of monitoring subsidence of peat soils, i.e.:</p> <p>Water Level Monitoring, using water level pole.</p> <ul style="list-style-type: none"> - Monitoring of Peat Subsidence, using peat subsidence pole. There are 4 pole subsidence installed in Tanjung Selamat Estate Block A16f, B13i, C14i and D13j. In Pangkatan Estate there are 12 subsidence poles installed in Block A18i, A18b, A16e, A17a, H92e, G92d, G92i, B18g, B18b, C91n, D17i and C91h. - Water Table Monitoring, using piezometer. There are 4 piezometers installed in Tanjung Selamat Estate Block A16f, B13i, C14i and D13j. While in Pangkatan Estate there are 12 piezometers installed in Block A18i, A18b, A16e, A17a, H92e, G92d, G92i, B18g, B18b, C91n, D17i and C91h. <p>There is no change related to the amount of water level until ASA1.2</p> <p>Monitoring of water level and water table performed twice in a month. During visit to water table at Block D13q Tanjung Selamat Estate, found</p>	Complied

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		<p>that water table is 50 cm from surface. During visit to water table at Block A16f Pangkatan Estate, found that water table is 41 cm from surface.</p> <p>Based on the meeting in November 2018 at the Directorate General of Environmental Pollution and Damage Elimination of the Ministry of Environment and Forestry - "<i>Direktorat Jenderal Pengendalian Pencemaran dan Kerusakan Lingkungan Kementerian Lingkungan Hidup dan Kehutanan</i>", PT Indo Sepadan Jaya is included in the Peat Restoration policy. So based on a letter from the Directorate General of Environmental Pollution and Damage Elimination of the Ministry of Environment and Forestry No. S.320/PPKL/PKG/PKL.6/11/2018 dated 22 November 2018, regarding the follow-up to the implementation of the restoration of peat ecosystems and the submission of a map of indications of damage to the peat ecosystem, that the company is mandatory to restore the function of the peat ecosystem as stipulated in PermenLH No. P.16/MENLHK/SETJEN/ KUM.1/2017 concerning technical guidelines for restoring peat ecosystem.</p> <p>Tanjung Selamat Estate, PT Indo Sepadan Jaya has implemented a peat ecosystem restoration plan and recorded on "<i>Rencana Pemulihan Ekosistem Gambut</i>" and the document was sent to the Minister of Environment and Forestry on 11 March 2019, the document contains:</p> <ol style="list-style-type: none"> 1) PT Indo Sepadan Jaya Peat Ecosystem Recovery Plan Document. 2) Map of peatland use area. As well as monitoring points for peat land. <p>Receipt of Plantation Unit Peat Damage Indication Map and/or Plantation Activities for submission in the form of Peat Ecosystem Damage Indication Map and/or Plantation Activities with no. S.320/PPKL/PKG/PKL.0/11/2018 dated 26 November 2018.</p> <p>Available decree of "Direktur Jenderal Pengendalian Pencemaran dan Kerusakan Lingkungan" dated 26 July 2019, regarding "Penaatan Tinggi Muka Air Tanah dan Titik Stasiun Pemantauan Curah Hujan PT Indo</p>	
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		<p>Sepadan Jaya". Described map of monitoring point, person in charge, monitoring schedule once in two weeks, reporting obligation in three month intervals to "Direktur Jenderal Pengendalian Pencemaran dan Kerusakan Lingkungan Kementerian Lingkungan Hidup dan Kehutanan"; Governor of North Sumatera and Regent of Labuhanbatu Selatan Regency.</p> <p>Pangkalan Estate, PT Rantau Sinar Karsa has established and sent Document of Peatland Ecosystem Restoration Plan to the "Direktorat Jenderal Pengendalian Pencemaran dan Kerusakan Lingkungan Kementerian Lingkungan Hidup dan Kehutanan" on 5 November 2019. Available letter from the Director General No. S.94/PPKL/PKG/PKLO/4/2019 dated 1 April 2019 regarding Instructions for implementing peat ecosystem restoration and submitting indications maps of peat ecosystem damage. Available map of damage to the peat ecosystem as attachment of Note No. S.94/PPKL/PKG/PKLO/4/2019 dated 1 April 2019 in scale 1:24,000. The Ministry of Environment and Forestry has acknowledged the restoration plan.</p>	
7.7.7	<p>(C) All peat areas not planted and reserved in managed areas (regardless of depth) are protected as 'peatland conservation areas'; unit of certification are prohibited from constructing drainage channels, building roads and new electricity lines on peatlands; unless if it is for a non-corporate land clearance. Peatlands are managed in accordance with 'RSPO Best Management Practices for the Management and Rehabilitation of Natural Vegetation related to Oil Palm Cultivation that already exists in Peatlands' (the latest version) along with relevant audit guidelines.</p>	<p>Based on field visit, interview and document review during ASA1.2, there is no addition (extension) planting on peat in Tanjung Selamat and Pangkatan Estate. All peat area planted are inside the existing plantation.</p>	Complied
Criteria 7.8: Practices maintain the quality and availability of surface and groundwater.			
7.8.1	<p>A water management plan is available and is implemented to support efficient use of water sources and continuous availability and avoid negative impacts on other users in the catchment. The plan referred to contains the following matters:</p>	<p>PT Indo Sepadan Jaya – Tanjung Selamat POM and supply bases have established water management plan, consist of management water supply for domestic, water consumption and measurement of water quality. Identification water need as regulated in "Peraturan Menteri PU</p>	Complied

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	<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>No.14/PRT/M/2010 (domestic consumption is 60 liters/person/day and water needed for mill processing, Ground and surface water resources and its permit, management and monitoring waste water, included domestic waste water.</p> <p>The Company has a water management document, both in the estate and mill. Monitoring the implementation of water management has been implemented on a regular basis, such as surface water quality monitoring each semester at Kalundang river (upstream and downstream) and merbau river (Upstream and downstream) are available in the report of RKL/RPL. Company has analysed water quality each semester to ensure the compliance against PP No. 82 tahun 2001 regarding water quality standard, the result of water quality monitoring on 5 August 2022 by Laboratory PT ITEC Solution Indonesia (sample No. D.08.1580-1.a-BT.22 and D.08.1580-1.b-BT.22) shown that water quality is complies with national regulation.</p> <p>Procedure SOP AA-APM-OP-1100.05. R1 "Konservasi Tanah dan Air" has been established to maintain the quality and availability of water. Procedures was also established for protection and management of riparian buffer zones at or before replanting. Procedure mentioned that in 50m on the left and right side of riparian buffer zones, estates are prohibited to apply agrochemical, used manual manuring and river bank was planted by erosion barrier crop (planting of "vetiver" grass, Pheronema canescens and Bamboosa sp). The organisation also has policy that prohibits estates for planting in 50m on the left and right side of riparian buffer zones at or before replanting. Warning board placed regarding prohibition to apply agrochemicals and fertiliser in the buffer zone. Riparian buffers of small natural water courses were 50 metres wide on both sides of the rivers as defined in the procedure AA-KL-12-EFP "Restorasi Riparian dan Areal Sekitar Danau/Waduk atau Mata Air lainnya". Several evidence of maintaining quality and availability of water were evident, such as plan and realisation of riparian</p>	
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		<p>management, installation of warning boards, planting erosion prevention plan (e.g. <i>Pteronema canescens</i>, <i>Terminalia cattapa</i>, <i>Bamboosa sp</i> and vetiver grass) and monitoring of water quality.</p> <p>PT Indo Sepadan Jaya and PT Rantau Sinar Karsa does not limit access to clean water or does not pollute the water used by the community. Company has monitor clean water quality each semester to ensure the water use by community and employee are met with standard Permenkes No. 32 Tahun 2017 regarding clean water quality standard. Latest monitoring on 11 October 2022 by Laboratory PT ITEC Solution Indonesia shown that water quality is met with the standard, certificate analysis number D.10.1928/LHU/2022.</p>	
	7.8.1b Workers have adequate access to clean water.	<p>Company provide the clean water for workers at housing area with ground water (drill well) at Tanjung Selamat Estate and clean water from Mill for Mill workers Housing. Regular water analysis was performed to monitor the water quality. Water analysis performed by accredited laboratory "PT ITEC Solution Indonesia" each semester for Clean water. Sample seen on Clean Water analysis at Tanjung Selamat POM , Tanjung Selamat Estate and Pangkatan Estate 11 October 2022 by Laboratory PT ITEC Solution Indonesia; standard refer to PermenKes No. 32 year 2017 Appendix I, Chapter IIA, analysis result shown that all parameter analyzed are met with the standard regulation, certificate analysis number D.10.1928/LHU/2022.</p> <p>Interview with workers during onsite audit confirmed that they have adequate access to clean water provide by company.</p>	
7.8.2	<p>(C) Water courses and wetlands are protected, including the maintenance and restoration of riparian zones and other buffer zones during or before replanting, in accordance with the "RSPO Manual on BMPs for the management and rehabilitation of riparian reserves" (April 2017) or Simplified Guide Management and Rehabilitation of Riparian Reserves (2018).</p>	<p>PT Indo Sepadan Jaya and PT Rantau Sinar Karsa has establish management plan to protect water courses and wetlands, including securing and maintaining appropriate riparian.</p> <ul style="list-style-type: none"> - Riparian restoration with forest vegetation plant/tree. - Establish zone for zero chemical. No spraying and fertilizing along riparian zone. Based on visit in riparian zone (Sempadan Sungai 	Non-compliance

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		<p>Kalundang in Tanjung Selamat Estate and Sungai Merbau in Pangkatan Estate)</p> <ul style="list-style-type: none"> - Conserve natural vegetation in riparian zone - Restricted to conduct replanting palm oil in riparian area <p>During field visit to Kalundang River at Tanjung Selamat Estate and Merbau River at Pangkatan Estate can be shown that riparian area are well maintained, no chemical application near to riparian, no disturbance on riparian, natural vegetation are protected and the signboard information and awareness are available.</p> <p>Non conformity raised during audit:</p> <p>During a field visit to the Tanjung Selamat POM, it was found that there was leachate from the boiler ashes which flowed into the natural ditch and did not flow into the waste pond.</p>	
7.8.3	<p>Mill effluent is managed according to applicable regulations. The quality of mill effluent discharged, especially BOD (Biochemical Oxygen Demand) is monitored in accordance with applicable regulations.</p>	<p>Tanjung Selamat POM has an effluent treatment system (WWTP), which consists of Colling Pond, Primary Anaerobic pond, Secondary Anaerobic pond, Acidification pond, and Buffering pond. Procedure of WWTP operation available in Mill Policy Manual (MPM) dated February 1, 2013, chapter AA-MPM-OP-1400.13-R1.</p> <p>Tanjung Selamat POM has installed Biogas power plant (Methane capture) since 2019 to generate electrical power by using waste water treatment. The biogas system has Anaerobic MBR system through digester Thermophilic fermentation, and anaerobic membrane tank.</p> <p>According to effluent monitoring data, all produced mill effluent used for Biogas plant and after following the flow process of WWTP the waste water which has fulfilled the standard/threshold discharged to the river. Mill holds permit to discharge waste water into the river from local authority through Decree number 503.660.31/397/DPMPTSP-BP2MNP/2018, issued on 21st September 2018 valid for 5 years.</p>	Complied

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		<p>As required by permit, Mill conducts monthly check on discharged effluent in cooperation with accredited Laboratory (Laboratorium Balai Teknik Kesehatan Lingkungan dan Pengendalian Penyakit (BTKLPP) Kelas I Medan). According to recent testing result, all parameter of applied effluent has met the applicable threshold of PerMenLH No. 05 tahun 2014 Lampiran III regarding standard of effluent discharge to the river.</p> <p>Sample seen effluent monitoring year 2022:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th rowspan="2">Parameter</th> <th rowspan="2">Standard (mg/l)</th> <th colspan="6">Hasil Analisa</th> </tr> <tr> <th>Jan</th> <th>Feb</th> <th>Mar</th> <th>Apr</th> <th>Mei</th> <th>Jun</th> </tr> </thead> <tbody> <tr> <td>TSS</td> <td>250</td> <td>70</td> <td>64</td> <td>72</td> <td>58</td> <td>67</td> <td>98</td> </tr> <tr> <td>pH</td> <td>6.0 – 9.0</td> <td>7.40</td> <td>7.10</td> <td>7.40</td> <td>7.60</td> <td>7.20</td> <td>7.50</td> </tr> <tr> <td>BOD</td> <td>100</td> <td>40.93</td> <td>32.90</td> <td>29.66</td> <td>31.52</td> <td>36.81</td> <td>29.46</td> </tr> <tr> <td>COD</td> <td>350</td> <td>126.82</td> <td>115.86</td> <td>108.95</td> <td>114.18</td> <td>129.54</td> <td>110.75</td> </tr> <tr> <td>Minyak dan Lemak</td> <td>25</td> <td>7.20</td> <td>8.40</td> <td>7.90</td> <td>6.10</td> <td>7.10</td> <td>9.10</td> </tr> <tr> <td>Nitrogen total</td> <td>50</td> <td>15.12</td> <td>12.91</td> <td>10.66</td> <td>13.77</td> <td>16.13</td> <td>14.63</td> </tr> </tbody> </table> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th rowspan="2">Parameter</th> <th rowspan="2">Standard (mg/l)</th> <th colspan="6">Hasil Analisa</th> </tr> <tr> <th>Jul</th> <th>Aug</th> <th>Sept</th> <th>Oct</th> <th>Nov</th> <th>Dec</th> </tr> </thead> <tbody> <tr> <td>TSS</td> <td>250</td> <td>92</td> <td>112</td> <td>84</td> <td>106</td> <td>130</td> <td>151</td> </tr> <tr> <td>pH</td> <td>6.0 – 9.0</td> <td>7.80</td> <td>8.10</td> <td>7.60</td> <td>7.40</td> <td>7.15</td> <td>7.60</td> </tr> <tr> <td>BOD</td> <td>100</td> <td>51.75</td> <td>35.64</td> <td>41.29</td> <td>33.82</td> <td>40.11</td> <td>32.81</td> </tr> <tr> <td>COD</td> <td>350</td> <td>160.48</td> <td>142.18</td> <td>166.83</td> <td>149.71</td> <td>170.37</td> <td>190.63</td> </tr> </tbody> </table>	Parameter	Standard (mg/l)	Hasil Analisa						Jan	Feb	Mar	Apr	Mei	Jun	TSS	250	70	64	72	58	67	98	pH	6.0 – 9.0	7.40	7.10	7.40	7.60	7.20	7.50	BOD	100	40.93	32.90	29.66	31.52	36.81	29.46	COD	350	126.82	115.86	108.95	114.18	129.54	110.75	Minyak dan Lemak	25	7.20	8.40	7.90	6.10	7.10	9.10	Nitrogen total	50	15.12	12.91	10.66	13.77	16.13	14.63	Parameter	Standard (mg/l)	Hasil Analisa						Jul	Aug	Sept	Oct	Nov	Dec	TSS	250	92	112	84	106	130	151	pH	6.0 – 9.0	7.80	8.10	7.60	7.40	7.15	7.60	BOD	100	51.75	35.64	41.29	33.82	40.11	32.81	COD	350	160.48	142.18	166.83	149.71	170.37	190.63	
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		Nitrogen total	50	18.31	21.87	20.14	18.76	26.43	22.08																																												
		Waste water analysis result for January – March 2023 has not been issued by laboratory test at the time of the audit.																																																			
7.8.4	Mill water use per tonne of FFB is monitored and recorded.	Tanjung Selamat POM has recorded the mill water use per ton FFB, includes monitoring of water usage for mill processing and domestic usage. The results of water usage monitoring is recorded in the "Mill Operation Summary" year 2022, updated in December 2022. The actual of water consumption (m ³ /ton FFB) in December 2022 is lower than budget 1.20 m ³ /ton FFB.								Complied																																											
		<table border="1"> <thead> <tr> <th rowspan="2">Month</th> <th colspan="3">2022</th> </tr> <tr> <th>Water Volume (m³)</th> <th>FFB process</th> <th>Water consumption (m³/ton TBS)</th> </tr> </thead> <tbody> <tr> <td>January</td> <td>14,570</td> <td>15,059.27</td> <td>0.96</td> </tr> <tr> <td>February</td> <td>15,625</td> <td>16,390.56</td> <td>0.95</td> </tr> <tr> <td>March</td> <td>23,711</td> <td>24,056.16</td> <td>0.98</td> </tr> <tr> <td>April</td> <td>24,103</td> <td>24,584.87</td> <td>0.98</td> </tr> <tr> <td>May</td> <td>23,266</td> <td>24,120.94</td> <td>0.96</td> </tr> <tr> <td>June</td> <td>29,826</td> <td>30,712.32</td> <td>0.97</td> </tr> <tr> <td>July</td> <td>27,903</td> <td>28,193.75</td> <td>0.99</td> </tr> <tr> <td>August</td> <td>29,022</td> <td>28,887.88</td> <td>1.01</td> </tr> <tr> <td>September</td> <td>28,982</td> <td>26,324.77</td> <td>1.10</td> </tr> </tbody> </table>									Month	2022			Water Volume (m ³)	FFB process	Water consumption (m ³ /ton TBS)	January	14,570	15,059.27	0.96	February	15,625	16,390.56	0.95	March	23,711	24,056.16	0.98	April	24,103	24,584.87	0.98	May	23,266	24,120.94	0.96	June	29,826	30,712.32	0.97	July	27,903	28,193.75	0.99	August	29,022	28,887.88	1.01	September	28,982	26,324.77	1.10
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		October	28,952	26,900.39	1.07	
		November	26,862	25,764.67	1.04	
		December	26,771	24,020.38	1.11	
Criteria 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised						
7.9.1	Plans to increase the efficiency of fossil fuel use and to optimize renewable energy are available, monitored and documented	<p>All energy used in both mills is monitored and recorded under document of "<i>Laporan Unit Pabrik 2023</i>" and "<i>Pemakaian Energi Pabrik Tanjung Selamat 2023</i>". Fossil fuel records are maintain and trends shown. Energy use records include accurate measurements of renewable energy use per tonne of FFB processed. All the fibre and most of shell consumed internally as boiler fuel.</p> <p>Tanjung Selamat POM is using 100% fiber and most of shell production for power generation during FFB processing. The fiber and nut shell is by-product from CPO production. Tanjung Selamat 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. Tanjung Selamat POM has also calculated the potential energy generated from using fiber and nut shell. From calculation it was known that there is energy surplus, whereby used as power generation when mill is in operation but not processing FFB (electricity source, deaning, etc.).</p> <p>PT Indo Sepadan Jaya and PT Rantau Sinar Karsa has prepared the program for improving efficiency of the use of fossil fuels and to optimize renewable energy under "Program Manajemen Lingkungan" year 2022/2023. To improving efficiency of the use of fossil fuels such monitoring on use of fossil fuels. Fossil fuel records was maintenance and the trends shown. Energy use records include accurate measurements of renewable energy use per ton of FFB processed. Fossil</p>				Complied

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		<p>fuel usage is recorded for operational purpose, including the efficiency analysis.</p> <p>Since January – December 2022, shell usage for boiler fuel was 2,236 ton and Fiber usage as boiler fuel was 37,370 ton.</p> <p>From the total energy use for palm oil mill process can be shown that renewable energy use was 93% and energy from fossil fuel was 7%.</p> <p>Fossil fuel usage is recorded for operational purpose, including the efficiency analysis.</p> <p>During audit, can be shown that efficiency for diesel fuel usage has been minimize by monitoring klep stell, air cleaner maintenance, tire pressure monitoring, and stel nozzle monitoring.</p>	
Criteria 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.			
7.10.1	<p>(C) GHG emissions for the unit of certification are identified and assessed. Plans to reduce or minimize GHG emissions are implemented, monitored through the PalmGHG calculator, and reported publicly.</p>	<p>By June 2019 PT ISJ has operate Methane Capture (biogas plant) to generate electric power.</p> <p>PT Indo Sepadan Jaya has established "SOP Mitigasi gas Rumah Kaca AA-MPM-OP-1400.19.R1, dated 1 March 2015". Identification of pollutant and GHG has been implemented by Tanjung Selamat POM, Tanjung Selamat Estate and Pangkatan Estate, such as: usage of inorganic fertilizer, pesticide, fossil fuel usage, peat land, and POME.</p> <p>Based on Significant pollution and GHG emission was identified, for estates comes from using of pesticides, action plan to reducing pesticide was made such as program of integrated pest control where minimize to use chemical/pesticides.</p> <p>The Certificate Holder has Strategic and Mitigation Plan to reduce GHG emission, in example as follow:</p> <ol style="list-style-type: none"> 1. Sector: Plantation operation 	Complied

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		<p>1.1. Identification of Emission Sources: Land Clearing and Planting (Land Use Change)</p> <p>1.1.1. Activities: Land Clearing</p> <p>1.1.1.1. Potential Mitigation Options:</p> <ul style="list-style-type: none"> • Adopted Zero Burning Land Clearing methods • No Land Clearing in areas that identified as HCV area • Keep the HCV area as Carbon Stock/sequestration • Periodically inspection and patrol to avoid HCV disturbance and land fire <p>1.1.2. Activities: Fertilizing/Manuring</p> <p>1.1.2.1. Potential Mitigation Options:</p> <ul style="list-style-type: none"> • Effective fertilizing based on dosages and recommendation from Agronomy Department • No Fertilizing on Rainy • No Fertilizing on Riparian Zone • Socialization to Worker the policy of Fertilizing in Company <p>The results of document verification and field visits, it is known that the company has made another efforts in reducing GHG emissions, such as:</p> <ul style="list-style-type: none"> - Has installed a dust collector to catch dust or particles flying in the air and also has monitored the air quality carried out by conducting air quality testing and reported every semester contained in the UKL-UPL report. 	
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		<ul style="list-style-type: none"> - The use of fiber and shells as a boiler fuel to minimize the fossil fuel usage. - Utilization of waste water for Land applications to minimize the methane emission. - Utilization of EFB for composting to minimize the inorganic/chemical fertilizer usage. <p>Monitoring the physical condition of WWTP and perform the recorded volume of waste water that is applied.</p>	
7.10.2	(C) Since 2014, an estimate of carbon stocks in the proposed development area has been carried out along with potential sources of emissions that can occur directly as a result of the development and plans to minimize these emissions are prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).	There Is no new planting. The company has started planting in 1984, no any new planting area/developing area since November 2005. Replanting has been performed since 2012 and planed until 2020. This indicator is Not Applicable	Not Applicable
7.10.3	(C) Other significant pollutant identification results are available and plans to reduce or minimize them are implemented and monitored.	<p>PT Indo Sepadan Jaya has identify other significant pollutant identification results as per "Evaluasi Aspek – Dampak Lingkungan" EMS-431-003-LT updated on January 2023. 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>The Certificate Holder has implemented and monitored a plan to reduce pollutant and emission. Emission, particulate, and noise from boiler and generator are tested and monitored every six month. Records of all monitoring are kept and documented. According to record of emission and particulate monitoring shown that all parameter analysed were met with the threshold/standard.</p> <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.</p>	Complied

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Criteria 7.11: Fire is not used for preparing land and is prevented in the managed area.			
7.11.1	(C) Land for new planting or replanting is not prepared by burning.	<p>The company has zero burning policy documented in "Kebijakan Perusahaan, 1 December 2019" stated in point 6: "Melakukan Praktek Tanpa Bakar dalam kegiatan pembangunan perkebunan dan secara aktif mendukung inisiatif mencegah dan mengawasi kebakaran hutan dan asap".</p> <p>The company has started planting in 1984. Curently there is no replanting activity in Tanjung Selamat Estate and Pangkatan Estate. Replanting has been performed since 2012 and planed until 2020.</p>	Complied
7.11.2	The unit of certification establishes fire prevention and control measures for lands that are directly managed by the unit of certification.	<p>There is no new planting within certified area of PT Indo Sepadan Jaya and PT Rantau Sinar Karsa after November 2005. The company has started planting in 1984. Curently there is no replanting activity in Tanjung Selamat Estate and Pangkatan Estate. Replanting has been performed since 2012 and planed until 2020.</p> <p>Replanting has been done mechanically, consist of: falling tree, chipping by excavator, terracing by excavator, digging, road construction, ditch/waterways construction, planting LCC and planting oil palm.</p> <p>Based on field visit to tanjung Selamat Estate and Pangkatan Estate confirmed that the land preparation is using mechanical method. No any open burning was noted for land preparation. It can also demonstrated in the agreement contract between compay and subcontractor that all activity of replanting is performed manual and mechanically.</p> <p>PT Indo Sepadan Jaya and PT Rantau Sinar karsa also has establish the emergency response team for fire mitigation. Emergency response equipment for fire mitigation also provided by company.</p>	Complied
7.11.3	The unit of certification engages stakeholders in adjacent locations for fire prevention and control measures.	The policy of zero burning has communicated to all smallholder and local community to engages stakeholders in adjacent locations for fire prevention and control measures.	Complied

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		Replanting has been done mechanically, consist of: falling tree, chipping by excavator, terracing by excavator, digging, road construction, ditch/waterways construction, planting LCC and planting oil palm. Company has established "Ketentuan Replanting areal Mineral". In the mechanism explained that replanting must be conducted mechanically without burning.	
Criteria 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.			
<p>PROCEDURAL NOTE for 7.12:</p> <p>The RSPO Principles and Criteria 2018 include new requirements to ensure the effective contribution of the RSPO in stopping deforestation. This will be achieved by incorporating the High Carbon Stock Approach (HCSA) Approach Guide into the revised standard.</p> <p>The RSPO ToC also encourages RSPO to commit to balancing between sustainable livelihoods and reducing poverty with the need to conserve, protect and improve the quality of ecosystems.</p> <p>High Forest Cover Countries (HFCC) are in dire need of economic opportunities that can help people choose their own path in carrying out development, while at the same time providing social and economic benefits and safeguards.</p> <p>Procedures will be developed that are adapted to support the development of sustainable palm oil by indigenous peoples and local communities who have legal or customary rights. The procedure will apply in certain HFCC countries and in the High Forest Cover Landscape (HFCL) within it.</p> <p>The development of this procedure will be guided by the No Deforestation Joint Steering Group (NDJSG) between the RSPO and HCSA members. In HFCC countries, RSPO will work with governments, communities and other stakeholders to develop this procedure through participatory processes at national and regional levels. The duration of this activity is specified in the Terms of Reference for NDJSG and is publicly available.</p>			
7.12.1	<p>(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCV or HCS forests.</p> <p>Historical analysis of Land Use Change Analysis (LUCA) is carried out before any new land clearing, in accordance with the RSPO LUCA Guidance document (see indicator 7.12.2).</p>	There is no new planting. The company has started planting in 1984, no any new planting area/developing area since November 2005. Replanting has been performed since 2012 and planed until 2020. This indicator is Not Applicable.	Not Applicable

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7.12.2	<p>(C) HCV and HCS forests, and other conservation areas are identified as follows:</p> <p>7.12.2a) For existing plantations, with an HCV assessments conducted by RSPO- approved assessors and have no new land clearing after 15 November 2018, the existing HCV assessments remains valid.</p>	<p>The Certificate Holder both of Tanjung Selamat and Pangkatan estates has conducted HCV assessment included both of planted area and the relevant wider landscape. The HCV assessment was conducted by the competent HCV assessor. There is no any revisions on HCV assessment and HCV areas since the last audit. Short explanation of HCV assessment documents as below:</p> <p><u>Tanjung Selamat Estate (under PT Indo Sepadan Jaya)</u></p> <p>The company has conducted HCV identification with collaborated IPB (Bogor Agriculture University) in 2013 as documented in "Laporan Akhir Kajian Penuh (Full Assessment) Identifikasi dan Analisis Keberadaan Nilai Konservasi Tinggi (NKT) di Areal PT Indo Sepadan Jaya – Kebun Tanjung Selamat Tahun 2014".</p> <p>Assessor team consist of Dr. Ir. H. Nyoto Santoso, MS (Team Leader/RSPO HCV Assessor), Ahmad Faisal, S.Hut, MSI (Member /RSPO HCV Assessor), Eko Adhiyanto, S.Hut (Member); Sutopo S.Hut (Member /RSPO HCV Assessor); Rae Birumbo (Member), Arif Prasetyo, S.Hut (Member).</p> <p>Peer Review by Dr. Jarwadi Budi Hernowo (Independent Consultant/RSPO HCV Assessor) in January 2014.</p> <p>Based on the assessment report, it was identified HCV area, such as: HCV 1.3: 1.24 ha and HCV: 5,33 ha (total HCV area 6.57 ha). It means HCV area was 0.16% from total area of Tanjung Selamat Estate (3.977 ha).</p> <p><u>Pangkalan Estate (under PT Rantau Sinar Karsa)</u></p> <p>The company has conducted HCV identification with collaborated IPB (Bogor Agriculture University) in 2013 as documented in "Laporan Akhir Kajian Penuh (Full Assessment) Identifikasi dan Analisis Keberadaan Nilai Konservasi Tinggi (NKT) di Areal PT Rantau Sinar Karsa – Kebun Pangkatan tahun 2014.</p>	Complied
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		<p>Assessor team consist of Dr. Ir. H. Nyoto Santoso, MS (Team Leader/RSPO HCV Assessor), Ahmad Faisal, Shut, MSI (Member /RSPO HCV Assessor), Eko Adhiyanto, S.Hut (Member); Sutopo S.Hut (Member /RSPO HCV Assessor); Rae Birumbo (Member), Arif Prasetyo, S.Hut (Member). Peer Review by Mr Rachmad Hermawan (Independent Consultant/RSPO HCV Assessor) in January 2014 Based on the assessment report, it was identified HCV area, such as: HCV 1.3 and HCV 4.1 (110,87 Ha) as well as HCV 6 (0,04 Ha). So, total HCV area at Pangkatan estate was 110.91 ha.</p> <p>Therefore, total HCV area within Tanjung Selamat and Pangkatan estates was 117.48 ha</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.	There is no new planting. The company has started planting in 1984, no any new planting area/developing area since November 2005. Replanting has been performed since 2012 and planed until 2020. This indicator is Not Applicable.	
7.12.3	(C) In High Forest Cover Landscapes (HFCLs) within HFCCs, a specific procedure will apply for legacy cases and development by indigenous peoples and local communities with legal or customary rights, taking into consideration regional and national multi-stakeholder processes. Until this procedure is developed and endorsed, 7.12.2 applies.	Based on HCV assessment report and field observation confirmed that there is no High Forest Cover Landscapes (HFCLs) within area of PT Indo Sepadan Jaya – Tanjung Selamat Estate and PT Rantau Sinar Karsa – Pangkatan Estate. PT Indo Sepadan Jaya and PT Rantau Sinar Karsa was located in another purpose area and not in forest area.	Not Applicable
PROCEDURAL NOTE for 7.12.3:			
Indicator 7.12.3. is not relevant to Indonesia, until further decisions by the RSPO.			
7.12.4	(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An Integrated management plans to protect and/or enhance HCV and HCS forests, peatland and other conservation areas are developed, implemented and adapted if necessary, and contains	There is no new planting after November 2018. The company has started planting in 1984, no any new planting area/developing area since November 2005. Replanting has been performed since 2012 and planed until 2020. This indicator is Not Applicable.	Not Applicable

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	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).		
7.12.5	Where rights of local communities have been identified in HCV areas and HCS forest after 15 November 2018, peatland and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.	There is no new planting after November 2018. The company has started planting in 1984, no any new planting area/developing area since November 2005. Replanting has been performed since 2012 and planed until 2020. This indicator is Not Applicable.	Not Applicable
7.12.6	All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.	<p>The company has established "Conservation Management Plan" to manage and to monitor of RTE's, latest conservation management plan updated in January 2023. It was note that according to HCV assessment there was found RTEs such as: Kucing kuwuk (<i>Prionailurus Bengalensis</i>), Burung Madu kelapa (<i>Anthreptes Malacensis</i>), Elang Brontok (<i>Nisaetus Cirrhatus</i>), Kuntul kecil (<i>Egretta garzeta</i>) and etc.</p> <p>Company has monitor the RTE species and HCV area regularly.</p> <p>Based on document "LAPORAN MONITORING TUMBUHAN DAN SATWA LIAR (HCV)" for period January – June 2022 and July – December 2022, there is found and reported any RTE species (flora and fauna) within areas such as: Monyet ekor panjang (<i>Macaca fascicularis</i>), Elang tikus (<i>Ictinaetus malayensis</i>), cekakak belukar (<i>Halcyon smyrnensis</i>), burung pelatuk (<i>Dryocopus javensis</i>) etc.</p> <p>Company has prepared a procedure for protection of flora and fauna, explained in Environmental Management System: Biodiversity (AA-432-002e-LT), IUCN red list (AA-432-006-LT), CITES list (AA-432-07-LT).</p> <p>Estate has established the management plan to maintain and/or enhance High conservation value area. HCV management and monitoring plan described measures taken for each HCV and its</p>	Complied

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		<p>monitoring. Relevant laws were taken into account for determining appropriate measure including UU #5/1990 about Natural resources conservation, PP#7/1999 about List of protected plan and wildlife, Kepres #32/1990, and PP #26/2008. Conservation management plan 2023 consist of :</p> <ul style="list-style-type: none"> - HCV area demarcation - Socialization of HCV area and protection to employee and surrounding community - Riparian restoration - Prohibiting chemical application in riparian zone and its monitoring - Wildlife monitoring <p>Signboards are placed on the area identified with conservation values. Monitoring for the HCVs are carried out as per Conservation Management Plan. The conservation management plan covers area enhancement, socialization to workers and local communities, prohibition of chemical regime near the area and river buffer zone' restoration. Plan for monitoring and patrol has been incorporated into the management and monitoring plan. Another effort planned was to have HCV sign board and "no-hunting" sign boards placed near identified HCV areas – on progress.</p> <p>PT Indo Sepadan Jaya is also having procedure to monitor the protected/conservation area as per "SOP Pemantauan Areal Lindung" No.AA-PL-08-EFP – describing procedure for vegetation monitoring, wildlife monitoring (path and rapid method), conservation area inspection procedure, vegetation enhancement procedure and data analysis procedure.</p> <p>Interview and document verification of "LAPORAN MONITORING TUMBUHAN DAN SATWA LIAR (HCV)" for period January – June 2022 and July – December 2022 can be demonstrate that the measures contained in the management plan been actively implemented. Report</p>	
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		of management and monitoring also submitted to Balai Konservasi Sumberdaya Alam (BKSDA) North Sumatera Province on 30 January 2023.	
7.12.7	The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.	<p>There is no new planting after November 2018. The company has started planting in 1984, no any new planting area/developing area since November 2005. Replanting has been performed since 2012 and planed until 2020. This indicator is Not Applicable.</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 MONITORING TUMBUHAN DAN SATWA LIAR (HCV)".</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 & II year 2022 can be demonstrated. Results of monitoring was evaluated using trend evaluation. Monitoring RTE species in January – December 2022 observed type of mammal and two species was protected by law or IUCN Redlist such as Monyet ekor panjang (<i>Macaca fascicularis</i>), Elang tikus (<i>Ictinaetus malayensis</i>), cekakak belukar (<i>Halcyon smyrnensis</i>), burung pelatuk (<i>Dryocopus javensis</i>) etc.</p> <p>Result of monitoring gives the feedback into the management plan improvement. The results from monitoring of wildlife, environmental, and socio-cultural services gives feedback advice and recommendations to the management plan.</p>	Complied
7.12.8	(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV- HCSA assessment since 15	There is no new planting. The company has started planting in 1984, no any new planting area/developing area since November 2005.	Not Applicable



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	November 2018, the Remediation and Compensation Procedures (RaCP) applies.	Replanting has been performed since 2012 and planed until 2020. This indicator is Not Applicable.	
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Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2022** for **Tanjung Selamat Mill** 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 **Tanjung Selamat Mill** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	12.24
PKO	0.00

Extraction	%
OER	19.62
KER	4.10

Production	t/yr
FFB Process	295,016
CPO Produced	57,883
PKO Produced	0

Land Use	Ha
OP Planted Area	7,561.75
OP Planted on peat	7,561.75
Conservation (forested)	0
Conservation (non-forested)	117.48
Total	7,679.23

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	38,647	0.34	36,217.60	0.54	0	0	74,684.60	0.42
CO ₂ Emission from fertilizer	3,001.63	0.03	2,356.77	0.03	0	0	5,358.40	0.03
NO ₂ Emission from peat	29,155.16	0.26	27,450.28	0.41	0	0	56,605.45	0.32
NO ₂ Emission from fertilizer	2,188.11	0.02	1,486.17	0.02	0	0	3,674.27	0.02
Fuel Consumption	983.29	0.01	531.61	0.01	0	0	1,514.90	0.01
Peat Oxidation	212,653.35	1.90	200,216.20	2.97	0	0	412,871.55	2.30
Sink								
Crop Sequestration	-36,461.61	-0.33	-34,329.48	-0.51	0	0	-70,791.09	-0.39
Conservation Sequestration	0	0	0	0	0	0	0	0
Total	249,986.93	2.24	233,931.15	3.47	402,055.02	0	885,973.10	3.00

*Note: Includes both estates and smallholders

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Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	6,010.27	0.02
Fuel Consumption	222.02	0.00
Grid Electricity Utilization	112.46	0.00
Credit		
Export of Grid Electricity	0.00	0.00
Sales of PKS	-36,064.60	-0.12
Sales of EFB	0.00	-0.10
Total	-29,719.86	-0.10

Summary of Kernel Crusher Emission and Credit (if applicable)

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

*This mill has no kernel crusher operation.

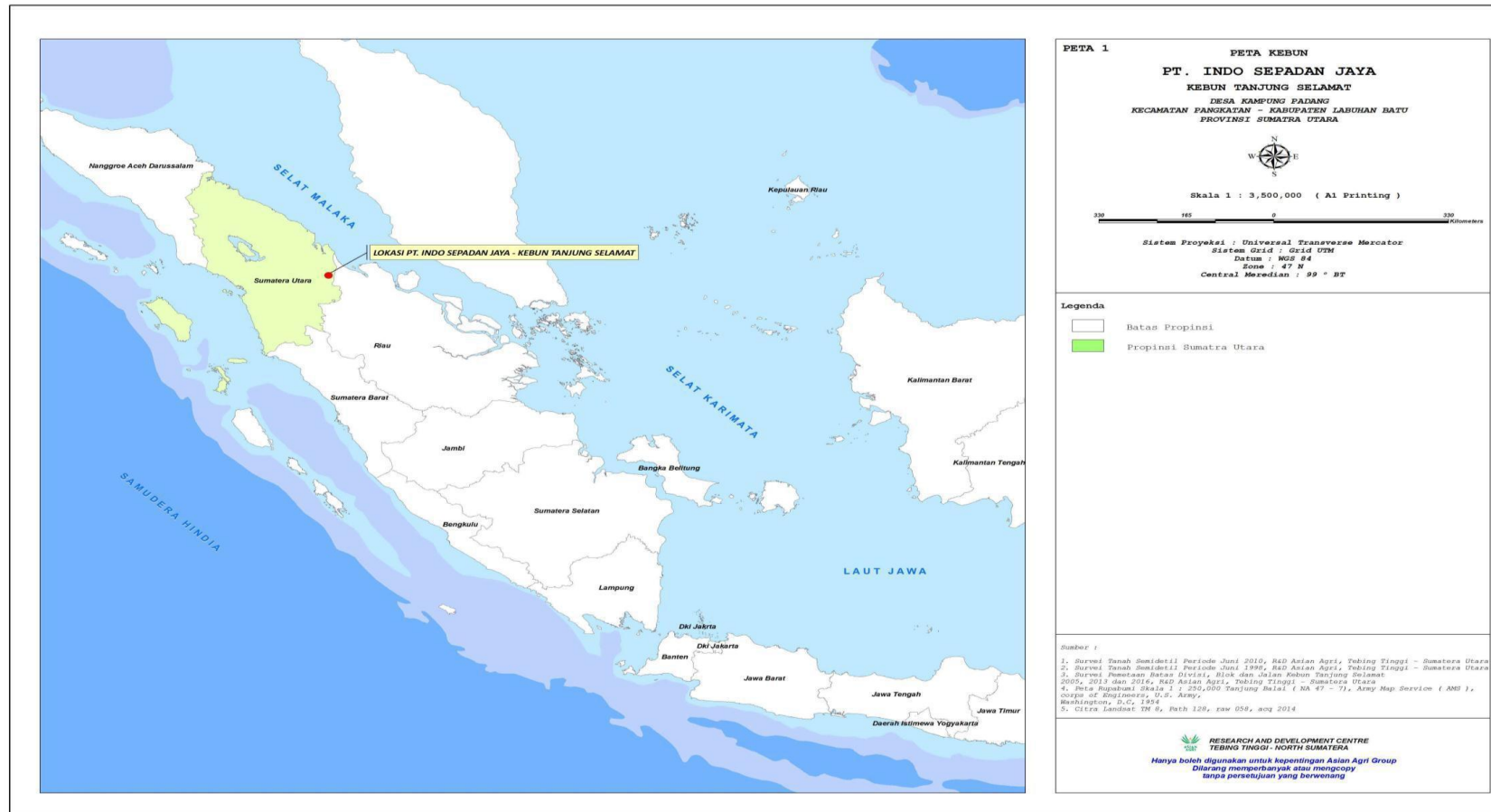
Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	0
Divert to anaerobic diversion (%)	100

POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	100
Divert to methane captured (flaring) (%)	13.78
Divert to methane captured (energy generation) (%)	86.22

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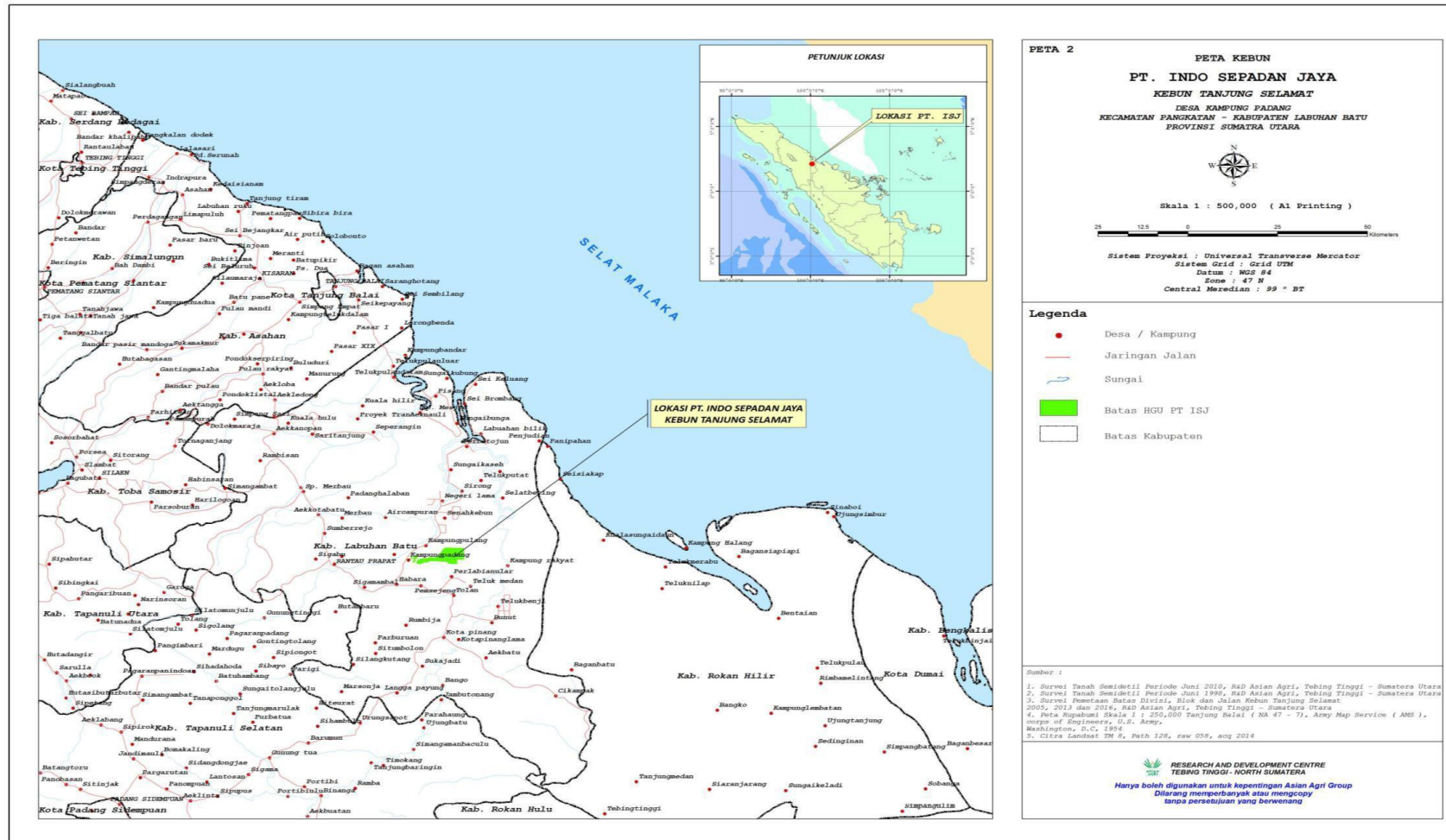
Appendix C: Location Map of Certification Unit and Supply bases

Figure 1 . Location of PT. Indo Sepadan Jaya & PT Rantau Sinar Karsa in Indonesia.



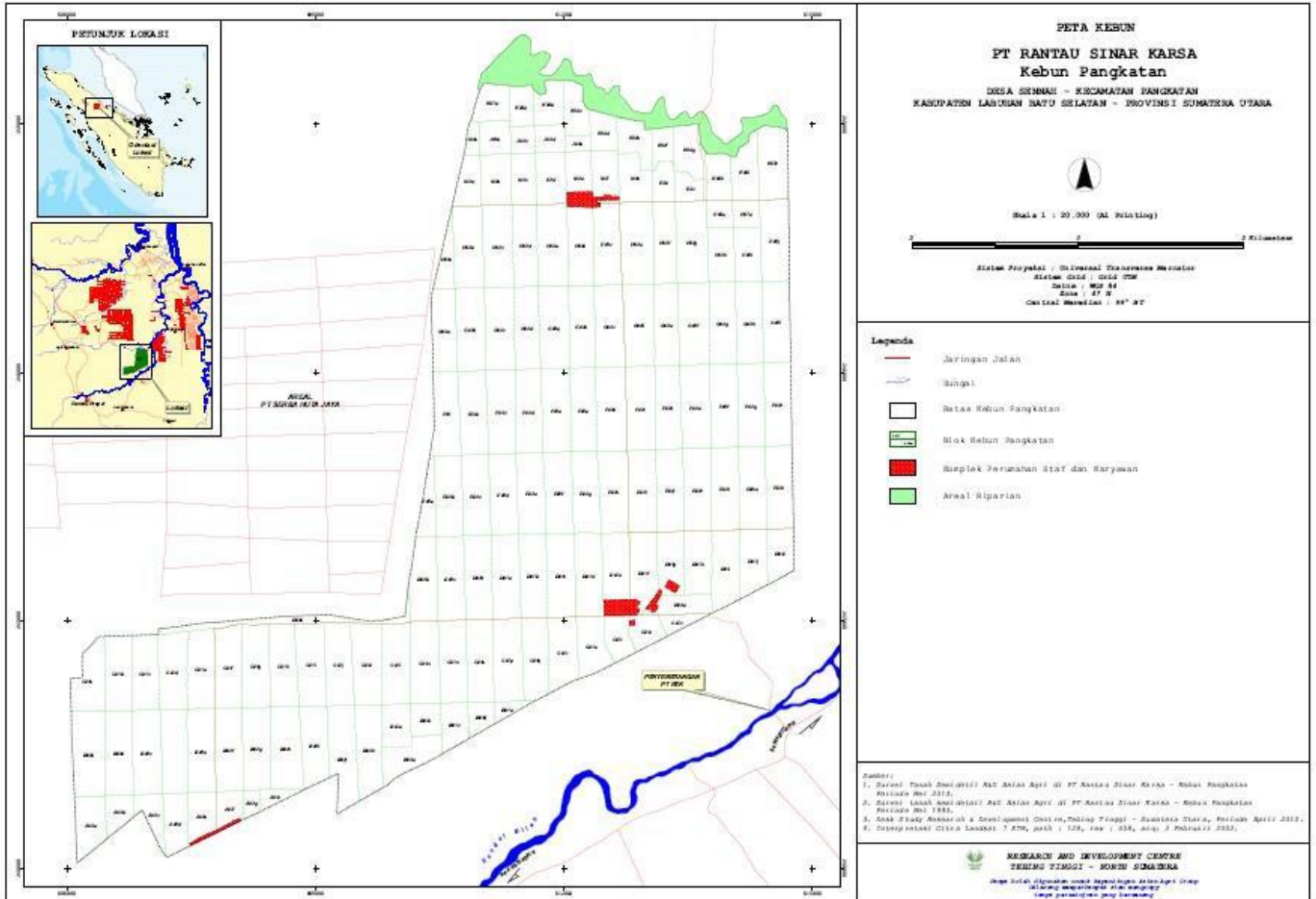
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Figure 2. Location of PT. Indo Sepadan Jaya & PT Rantau Sinar Karsa in North Sumatera Province, Indonesia.



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Figure 3b. Location of PT Rantau Sinar Karsa (Pangkatan Estate) and neighbouring entities



Appendix E: List of Smallholder Registered and/or sampled

Not applicable

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Appendix F: List of Abbreviations

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