

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

- Initial Assessment
- Annual Surveillance Assessment (1_1)
- Recertification Assessment (Choose an item.)
- Extension of Scope

Client Company Name / Parent Company: PT. Inti Indosawit Subur
Client company Address: Jl. MH. Thamrin No.31, Jakarta 10230, Indonesia
Certification Unit: PT. Rigunas Agri Utama – Bungo Tebo Mill
Location of Certification Unit: Tuo Sumay & Pinang Belai Village, Sumay & Serai Serumpun Sub District, Tebo Regency, Jambi Province, Indonesia
Date of Final Report: 22/06/2023

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Section 1: Scope of the Assessment

1. Company Details			
Parent Company	PT. Inti Indosawit Subur		
RSPO Membership Number	1-0022-06-000-00	Membership Approval Date	6 th February 2006
Address	Jl. MH. Thamrin No.31, Jakarta 10230, Indonesia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	PT. Rigunas Agri Utama – Bungo Tebo Mill		
Location / Address	Tuo Sumay & Pinang Belai Village, Sumay & Serai Serumpun Sub District, Tebo Regency, Jambi Province, Indonesia		
Website	www.asianagri.com		
Management Representative	Ivan Novrizaldie	E-mail	Ivan_Novrizaldie@asianagri.com
Telephone	+62 21-2301119	Facsimile	+62 21-2301120

2. Certification Information			
Certificate Number	RSPO 620917	Certificate Start Date	13/05/2022
Date of First Certification	03/12/2015	Certificate Expiry Date	12/05/2027
Scope of Certification	Production of 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_1) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input type="checkbox"/> RSPO P&C 2018 for the Production of Sustainable Palm Oil <input checked="" type="checkbox"/> Indonesia National Interpretation 2020 for RSPO P&C 2018 for the Production of Sustainable Palm Oil		
Supply Chain Module	<input type="checkbox"/> Identity Preserved; <input checked="" type="checkbox"/> Mass Balance	Mill Capacity	60 MT/hour
ISH certification Phase	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		
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
ID05/65250	ISO 14001:2015	SGS	10 June 2023
EU-ISCC-Cert-DE100-02730122	ISCC	SGS	28 June 2023
BSI-ISPO 619412	ISPO	BSI Group Indonesia	5 December 2026

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Bungo Tebo Palm Oil Mill	Village of Tuo Sumay (sub-District of Sumay) and Pinang Belai (sub-District of Serai Serumpun), Tebo Regency, Jambi Province.	1° 20' 46.02" S	102° 27' 17.04" E
Bungo Tebo Estate	Village of Tuo Sumay (sub-District of Sumay) and Pinang Belai (sub-District of Serai Serumpun), Tebo Regency, Jambi Province	01° 15' 13.00" S	102° 21' 39.00" E
Koperasi Tanjung Dani Sakti (110 smallholders)	Tanjung Dani Hamlet, Tuo Sumay Village, Sumay sub-District, Tebo Regency, Jambi Province	01° 19' 17.00" S	102° 24' 36.00" E
Koperasi Sumay Jaya (116 smallholders)	Tuo Sumay Village, Sumay sub-District, TeboRegency, Jambi Province	01° 23' 02.00" S	102° 26' 13.00" E
Koperasi Sumber Usaha (92 smallholders)	Tuo Sumay Village, Sumay sub-District, TeboRegency, Jambi Province	01° 23' 06.00" S	102° 26' 49.00" E
Koperasi Sawit Bina Tani (119 smallholders)	Sungai Rambai Village, Tebo Ulu sub-District, Tebo Regency, Jambi Province	01° 22' 31.00" S	102° 23' 54.00" E
Koperasi Belarik Jaya (91 smallholders)	Jati Belarik Village, Sumay sub-District, Tebo Regency, Jambi Province	01° 27' 36.00" S	102° 27' 06.00" E
Koperasi Sawit Tambara Jaya (109 smallholders)	Tambun Arang Village, Sumay sub-District, TeboRegency, Jambi Province	01° 26' 16.00" S	102° 28' 02.00" E
Koperasi Tunas Harapan (72 smallholders)	Teluk Langkap Village, Sumay sub-District, TeboRegency, Jambi Province	01° 26' 02.00" S	102° 26' 18.00" E
Koperasi Sejahtera Tani (44 smallholders)	Punti Kalo Village, Sumay sub-District, Tebo Regency, Jambi Province	01° 25' 29.00" S	102° 25' 31.00" E
Koperasi Produksi Tani Mandiri (79 smallholders)	Kandang Village, Tebo Tengah sub-District, TeboRegency, Jambi Province	01° 26' 34.00" S	102° 29' 24.00" E
Koperasi Tanjung Jaya Bersama (34 smallholders)	Tuo Sumay Village, Sumay sub-District, TeboRegency, Jambi Province	01° 19' 40.00" S	102° 28' 29.00" E

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Koperasi Tanjung Aur Duri (34 smallholders)	Teriti Village, Sumay sub-District, Tebo Regency, Jambi Province	01° 19' 38.00" S	102° 28' 03.00" E
Koperasi Sawit Sumay Makmur (429 smallholders)	Pinang Belai Village, Serai Serumpun sub-District, Tebo Regency, Jambi Province	01° 16' 58.00" S	102° 21' 50.00" E
Koperasi Sawit Makmur (336 smallholders)	Sekutur Jaya Village, Serai Serumpun sub-District, Tebo Regency, Jambi Province	01° 15' 34.00" S	102° 20' 01.00" E
Koperasi Barokah (186 smallholders)	Teluk Kasai Rambahan Village, Tebo Ulu sub-District, Tebo Regency, Jambi Province	01° 18' 00.00" S	102° 18' 40.00" E
Koperasi Sawit Keluarga Sejahtera (68 smallholders)	Bungo Tanjung Village, Tebo Ulu sub-District, Tebo Regency, Jambi Province	01° 12' 46.80" S	102° 18' 57.70" E
Koperasi Sawit Makmur Bersama (314 smallholders)	Bukit Pamuan Village, Serai Serumpun sub-District, Tebo Regency, Jambi Province	01° 12' 15.50" S	102° 18' 33.80" E
Koperasi Sawit Karya Makmur (355 smallholders)	Napal Putih Village, Serai Serumpun sub-District, Tebo Regency, Jambi Province	01° 11' 02.40" S	102° 17' 01.30" E
Koperasi Sawit Tanduk Perkasa (369 smallholders)	Suko Makmur Village, Serai Serumpun sub-District, Tebo Regency, Jambi Province	01° 09' 05.00" S	102° 13' 55.50" E
Notes:			

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
Bungo Tebo Estate	2,489.38	65	111.26	2,665.64	93.41
Koperasi Tanjung Dani Sakti	220	0	0	220	100
Koperasi Sumay Jaya	232	0	0	232	100
Koperasi Sumber Usaha	184	0	0	184	100
Koperasi Sawit Bina Tani	238	0	0	238	100
Koperasi Belarik Jaya	182	0	0	182	100
Koperasi Sawit Tambara Jaya	218	0	0	218	100
Koperasi Tunas Harapan	144	0	0	144	100
Koperasi Sejahtera Tani	88	0	0	88	100
Koperasi Produksi Tani Mandiri	158	0	0	158	100
Koperasi Tanjung Jaya Bersama	68	0	0	68	100
Koperasi Tanjung Aur Duri	68	0	0	68	100

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Koperasi Sawit Sumay Makmur	858	0	0	858	100
Koperasi Sawit Makmur	672	0	0	672	100
Koperasi Barokah	372	0	0	372	100
Koperasi Sawit Keluarga Sejahtera	136	0	0	136	100
Koperasi Sawit Makmur Bersama	628	0	0	628	100
Koperasi Sawit Karya Makmur	710	0	0	710	100
Koperasi Sawit Tanduk Perkasa	738	0	0	738	100
Total	8,403.38	65	111.26	8,579.64	97.95

Notes: * Based on HCV identification, HCV area was located in surrounding scheme smallholder plantation and outside of smallholder plots/block. So, there are no HCV area inside of smallholder plots

6. Plantings & Cycle						
Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Bungo Tebo Estate	-	1,977.38	512	-	2,489.38	-
Koperasi Tanjung Dani Sakti	-	-	220	-	220	-
Koperasi Sumay Jaya	-	-	232	-	232	-
Koperasi Sumber Usaha	-	-	184	-	184	-
Koperasi Sawit Bina Tani	-	-	238	-	238	-
Koperasi Belarik Jaya	-	-	182	-	182	-
Koperasi Sawit Tambara Jaya	-	-	218	-	218	-
Koperasi Tunas Harapan	-	-	144	-	144	-
Koperasi Sejahtera Tani	-	-	88	-	88	-
Koperasi Produksi Tani Mandiri	-	-	158	-	158	-
Koperasi Tanjung Jaya Bersama	-	-	68	-	68	-
Koperasi Tanjung Aur Duri	-	-	68	-	68	-
Koperasi Sawit Sumay Makmur	-	-	858	-	858	-
Koperasi Sawit Makmur	-	-	672	-	672	-
Koperasi Barokah	-	-	372	-	372	-
Koperasi Sawit Keluarga Sejahtera	-	-	136	-	136	-

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Koperasi Sawit Makmur Bersama	-	-	628	-	628	-
Koperasi Sawit Karya Makmur	-	-	710	-	710	-
Koperasi Sawit Tanduk Perkasa	-	-	738	-	738	-
Total (ha)	-	1,977.38	6,426	-	8,403.38	-

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 (Dec 2021 – Nov 2022)	Actual (Nov 2021 – Dec 2022)		Forecast (May 2023 – Apr 2024)#
		Previous license period (Nov 2021 – Apr 2022)	Current license period (May 2022 – Dec 2022)	
Bungo Tebo Estate	42,916	13,000	37,090	64,979
Koperasi Tanjung Dani Sakti	2,149	4,506	8,989	3,566
Koperasi Sumay Jaya	2,434	2,042	3,471	6,503
Koperasi Sumber Usaha	1,453	397	836	2,112
Koperasi Sawit Bina Tani	1,767	194	316	1,643
Koperasi Belarik Jaya	2,161	322	746	2,780
Koperasi Sawit Tambara Jaya	2,566	313	1,738	3,254
Koperasi Tunas Harapan	1,718	454	1,576	1,595
Koperasi Sejahtera Tani	1,328	667	2,112	1,363
Koperasi Produksi Tani Mandiri	3,288	272	1,027	2,499
Koperasi Tanjung Jaya Bersama	1,649	9	122	1,157
Koperasi Tanjung Aur Duri	297	-	1,203	642
Koperasi Sawit Sumay Makmur	5,859	8,029	12,907	3,267
Koperasi Sawit Makmur	8,361	3,867	6,786	11,162
Koperasi Barokah	3,781	4,883	6,840	8,935
Koperasi Sawit Keluarga Sejahtera	1,759	582	1,297	1,797
Koperasi Sawit Makmur Bersama	11,595	4,577	7,931	10,071
Koperasi Sawit Karya Makmur	9,207	5,425	9,730	11,043
Koperasi Sawit Tanduk Perkasa	8,588	4,877	9,157	11,651
Extension on 02/03/2023	36,916			

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Extension on 26/05/2023	27,917		
Total	177,710*	168,290	150,019

Note:

* Forecast Dec 2021 – Nov 2022: 112,877 MT

Koperasi Sawit Bina Tani, Koperasi Tanjung Aur Duri, Koperasi Sawit Sumay Makmur are waiting for replanting approval from the government so the manuring is stop and have impact to FFB production.

Koperasi Sumay Jaya and Koperasi Barokah have a yield of more than 20 mt/Ha due to the increase of FFB production. In 2022, all FFB production of scheme smallholder are above the budget (except for the KUD that in replanting program/progress) due to the palm oil still developing (young age) and its successful manuring application.

#Forecast period realigned with PalmTrace annual license period

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

Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Dec 2021 – Nov 2022)	Actual (Nov 2021 – Dec 2022)		Forecast (May 2023 – Apr 2024)
		Previous license period (Nov 2021 – Apr 2022)	Current license period (May 2022 – Dec 2022)	
Nil		Nil	Nil	
Total		N/A		

Note:

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

Out growers / smallholders	Tonnage (MT) / year			
	Estimated last year (Dec 2021 – Nov 2022)	Actual (Nov 2021 – Dec 2022)		Forecast (May 2023 – Apr 2024)
		Previous license period (Nov 2021 – Apr 2022)	Current license period (May 2022 – Dec 2022)	
Third party	-	127,374		120,000
Total	-	127,374		120,000

Note:

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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	November 2021	9,210	4,996	14,271
2	December - 2021	9,285	4,718	14,193
3	January - 2022	10,144	5,782	15,872
4	February - 2022	9,505	7,324	16,757
5	March – 2022	11,745	8,630	20,336
6	April – 2022	11,156	9,097	20,385
7	May – 2022	10,017	8,296	18,285
8	June - 2022	12,601	8,411	20,988
8	July – 2022	14,901	11,533	26,517
10	August - 2022	15,250	11,585	26,723
11	September – 2022	14,505	13,169	27,705
12	October – 2022	12,863	11,318	24,179
13	November - 2022	12,903	9,957	22,866
14	December – 2022	14,205	12,558	26,840
TOTAL		168,290	127,374	295,917
Note:				

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10. Summary of Certified Tonnage (MT) (not applicable for ISS)			
Estimated last year (Dec 2021 – Nov 2022)	Actual (Nov 2021 – Dec 2022)		Forecast (May 2023 – Apr 2024)
	Previous license period (Nov 2021 – Apr 2022)	Current license period (May 2022 – Dec 2022)	
FFB	FFB		FFB
112,877 mt (with extension 177,710 mt)	54,416 mt	113,874 mt	150,019 mt
	TOTAL	168,290 mt	
CPO (OER: 21.21 %)	CPO (OER: 21.37 %)		CPO (OER: 20.70 %)
23,935 mt (with extension 37,507 mt)	11,628.70 mt	24,334.88 mt	31,053.93 mt
	TOTAL	35,963.58 mt	
PK (KER: 5.50 %)	PK (KER: 5.32 %)		PK (KER: 5.50 %)
6,208 mt (with extension 9,352 mt)	2,894.93 mt	6,058.09 mt	8,251.05 mt
	TOTAL	8,953.03 mt	
Note: FFB extension: 36,916MT (02/03/2023), 27,917MT (26/05/2023); CPO extension: 7,992MT (02/03/2023), 5,580MT (26/05/2023); PL extension: 1,722MT (02/03/2023), 1,422MT (26/05/2023)			

10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	November - 2021	1,982	506
2	December - 2021	2,054	519
3	January - 2022	2,185	571
4	February - 2022	2,032	517
5	March - 2022	2,492	639
6	April - 2022	2,350	591
7	May - 2022	2,177	504
8	June - 2022	2,668	663
9	July - 2022	3,218	778
10	August - 2022	3,203	803
11	September - 2022	3,095	764
12	October - 2022	2,701	671
13	November - 2022	2,774	674
14	December - 2022	3,033	753
	TOTAL	35,964	8,953
Note:			

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11. Summary of Actual Volume sold					
Current License period (May 2022 – Dec 2022)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	22,640.81	-	-	-	22,640.81
PK (MT)	5,524.43	-	-	-	5,524.43
Credits	-	-	-	-	
Previous License period (Nov 2021 – April 2022)					
CPO (MT)	12,743.19	805	-	-	13,548.19
PK (MT)	3,434	-	-	-	3,434
Credits	-	-	-	-	-
Note: Conventional is RSPO certified material but sold as non-RSPO.					

11A. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any)				
No.	Buyers Name	PalmTrace Trading License Number	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	PT. Rigunas Agri Utama – Bungo Tebo KCP	RSPO_PO1000005127	-	8,958.43
2	PT. Sari Dumai Sejati	RSPO_PO1000009992	35,384	-
TOTAL			35,384	8,958.43
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	805	-
TOTAL			805	-
Note:				

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

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

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

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

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

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

2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on **20 – 25 February 2023**. The audit programme is included as Section 2.3. Where applicable, prior to the initial certification and recertification audit, 30 days Public Notification was made through the RSPO and BSI website on provide date.

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

The Critical NC close out on-site assessment was conducted on **31 March 2023**. The audit programs are included in Section 2.3.

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

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

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

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

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

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

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

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

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

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

Tentative Date of Next Visit: February 19, 2024 - February 24, 2024

Total Number of Mandays: 27.5

2.2 BSI Assessment Team

Name	Role	Competency
Eko Prastio Ramadhan (EPR)	Team Leader	<p>Education: Holds a Bachelor Degree in Forest Resources Conservation and Ecotourism from Forestry Faculty, Bogor Agricultural University (IPB).</p> <p>Work Experience: Over 4 years of working experience in biodiversity officer with Birdlife Indonesia and consultant with PT Inoa Konsultindo. Over 2½ years of working experience in palm oil estate with PT Salim Ivomas Pratama Tbk and Capitol Plantation Group implementing sustainability. Over 4½ years of working experience as RSPO P&C Certification Program Manager and auditor covering standard such as RSPO P&C, RSPO SCCS, ISPO, ISO 9001 and ISO 14001.</p> <p>Training attended: Completed ISO 14001:2015 Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, Social Impact Assessment Training, Endorsed RSPO SCC Auditor Lead Auditor Course, ISPO Auditor Batch 19 Training, ISO 9001 Lead Auditor Course, Identification of HCV Areas Training, RSPO Independent Smallholder (ISH) Auditor Training, and Endorsed RSPO Refresher Trainings.</p> <p>Language proficiency: Fluent in Bahasa Indonesia and English</p> <p>Aspect covered in this audit: Environment responsibility, environment impact assessment and management plan, Waste management, GHG.</p>
Mujinius Jalaraya (MJ)	Team Member	<p>Education: Holds a Bachelor Degree majoring in Forest Resources Conservation and Ecotourism, Bogor Agricultural University (IPB).</p> <p>Work Experience: 6 years working experience in palm oil plantations as SHE Assistant at PT. Astra Agro Lestari Tbk and Sustainability Supervisor at Teladan Prima Group. 8 years working experience as RSPO Auditor / Lead Auditor.</p> <p>Training attended: Completed ISO 9001 Lead Auditor course, ISPO Lead Auditor course, Endorsed RSPO P&C Lead Auditor course, Endorsed RSPO SCCS Lead Auditor course, Introductory Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation, ISO 14001 Internal Auditor Training, ISO 45001 Lead Auditor course, OHS Expert Training, SMETA Requirements Training, RSPO Independent Smallholder (ISH) Auditor Training, and Endorsed RSPO Refresher Trainings.</p> <p>Language proficiency: Fluent in Bahasa Indonesia and English</p> <p>Aspect covered in this audit: Natural and biodiversity conservation, HCV, and RSPO supply chain requirements</p>
Nanang Rusmana (NR)	Team Member	<p>Education: Holds a Bachelor Degree of Forestry, Bogor Agricultural University (IPB)</p> <p>Work Experience: 5 years working experience in palm oil industry as SHE Assistant at PT. Astra Agro Lestari Tbk. 3 years working experience in mining industry as Environment Coordinator and SHE Coordinator with PT. Kapuas Prima Coal Group. 6 years working experience as RSPO/ISPO auditor</p> <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</p>

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		<p>Assessor Course, General OHS Expert Course, SMETA Requirements training, RSPO Independent Smallholder (ISH) Auditor Training, and Endorsed RSPO Refresher Trainings.</p> <p>Language proficiency: Fluent in Bahasa Indonesia and English</p> <p>Aspect covered in this audit: Economic management plan, Estate best management practices, Mill best management practices.</p>
Edy Widodo (EW)	Team Member	<p>Education: Holds a Bachelor Degree majoring Agricultural Technology from University of Padjadjaran, Bandung.</p> <p>Work Experience: 8 years working experience in palm oil industry as Agronomist and Assistant Manager in various companies. 9 year working experience as RSPO/ISPO auditor.</p> <p>Training attended: Completed ISO 9001 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 RSPO Independent Smallholder (ISH) Auditor Training, and Endorsed RSPO Refresher Trainings.</p> <p>Language proficiency: Fluent in Bahasa Indonesia and English</p> <p>Aspect covered in this audit: Social requirements, contract agreement, human rights, workers' welfare, smallholder welfare, Stakeholder Consultation.</p>
Arif Faisal Simatupang (AF)	Team Member	<p>Education: Holds a Bachelor Degree in Agriculture, Majoring Agronomy, Gadjah Mada University</p> <p>Work Experience: Over 3 years of working experience in palm oil estate as Land Acquisition Officer and later as Division Manager with PT PP London Sumatera Indonesia Tbk. 8 years working experience as auditor since 2014 covering RSPO P&C and ISPO.</p> <p>Training attended: Completed ISO9001 Lead Auditor Course, ISO 14001 Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, Endorsed RSPO SCC Auditor Lead Auditor Course, ISPO Auditor Training, HCV and GIS training and SA8000 Auditor training, RSPO Independent Smallholder (ISH) Auditor Training, and Endorsed RSPO Refresher Trainings.</p> <p>Language proficiency: Fluent in Bahasa Indonesia and English</p> <p>Aspect covered in this audit: Legal Requirements, land & Legal issue, Policy and commitment, training, Occupation Health Safety requirement, HIRARC.</p>

Accompanying Persons:

Name	Role
None	None

2.3 Assessment Plan

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

Date	Time	Subjects	EPR	MJ	NR	AF	EW
Sunday, 19 February 2023	08.55 - 10.15	Flight Jakarta – Jambi (GA 126)	√	√	√	√	√
	10.30 – 19.00	Travel from Jambi to Bungo Tebo	√	√	√	√	√
Monday, 20 February 2023	08.00 – 09.00	Opening Meeting <ul style="list-style-type: none"> Presentation by PT. RAU – Bungo Tebo POM, Estate and Smallholder Presentation by BSI Indonesia 	√	√	√	√	√
	09.00 – 12.00	Field Visit to Bungo Tebo Estate <ul style="list-style-type: none"> Herbicide application programmes, harvesting, fertilizing operations, water management, road maintenance, terracing, HCV's, riparian zones, etc. Agrochemical stores, Fertilizer store, workshops, housing, landfill, clinic, riparian zones, Hazardous Waste, waste management, etc. Boundaries inspection, worker interviews, social amenities, etc. 	√	√	√	√	
	09.00 – 12.00	Public Consultation (External) <ul style="list-style-type: none"> Local communities Contractor Governance body 					√
	12.00 – 14.00	BREAK	√	√	√	√	√
	14.00 – 16.30	Field Visit to Bungo Tebo POM <ul style="list-style-type: none"> Occupational Health and Safety, Environment Aspect. Social Aspect and workers welfare, workers interview Best Management Practice for Mill and supply chain for mill. Field implementation for Operation Procedure. Inspection of processing, warehouse, workshop, mill wastes management, Effluent Ponds, OHS, Environment issues, POME application, workers interview, Supply chain for CPO mill, Review on SEIA documents and records, Document review, etc. 	√	√	√	√	
	14.00 – 16.30	Public Consultation (Internal)					√

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Date	Time	Subjects	EPR	MJ	NR	AF	EW
		<ul style="list-style-type: none"> • Union Labour • Koperasi Karyawan • Gender committee 					
	16.30 – 17.00	Wash-up Meeting	√	√	√	√	√
Tuesday, 21 February 2023	08.00 – 12.00	Field Visit to Scheme Smallholder Koperasi Tanjung Dani Sakti Field visit to Kavling/Block member of Smallholder to verify conformity with RSPO INA NI 2020 Standard, BMP, OHS-EMS Implementation, HCV, Social and Labor, Continual improvement, etc. (13 samples)		√	√		
	08.00 – 12.00	Field Visit to Scheme Smallholder Koperasi Sumber Usaha Field visit to Kavling/Block member of Smallholder to verify conformity with RSPO INA NI 2020 Standard, BMP, OHS-EMS Implementation, HCV, Social and Labor, Continual improvement, etc. (12 samples)	√			√	√
	12.00 – 14.00	BREAK	√	√	√	√	√
	14.00 – 16.30	Field Visit to Scheme Smallholder Koperasi Sawit Bina Tani Field visit to Kavling/Block member of Smallholder to verify conformity with RSPO INA NI 2020 Standard, BMP, OHS-EMS Implementation, HCV, Social and Labor, Continual improvement, etc. (14 samples)	√	√	√	√	√
	16.30 – 17.00	Wash-up Meeting	√	√	√	√	√
Wednesday, 22 February 2023	08.00 – 12.00	Field Visit to Scheme Smallholder Koperasi Sawit Sumay Makmur Field visit to Kavling/Block member of Smallholder to verify conformity with RSPO INA NI 2020 Standard, BMP, OHS-EMS Implementation, HCV, Social and Labor, Continual improvement, etc. (25 samples)	√	√	√	√	√
	12.00 – 14.00	BREAK	√	√	√	√	√
	14.00 – 16.30	Field Visit to Scheme Smallholder Koperasi Barokah Field visit to Kavling/Block member of Smallholder to verify conformity with RSPO INA NI 2020	√	√	√	√	√

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Date	Time	Subjects	EPR	MJ	NR	AF	EW
		Standard, BMP, OHS-EMS Implementation, HCV, Social and Labor, Continual improvement, etc. (17 samples)					
	16.30 – 17.00	Wash-up Meeting	√	√	√	√	√
Thursday, 23 February 2023	08.00 – 12.00	Document Review for Bungo Tebo POM and Bungo Tebo Estate	√	√	√	√	√
	12.00 – 14.00	BREAK	√	√	√	√	√
	14.00 – 16.30	Document Review for Bungo Tebo POM and Bungo Tebo Estate	√	√	√	√	√
	16.30 – 17.00	Wash-up Meeting	√	√	√	√	√
Friday, 24 February 2023	08.00 – 11.30	Document Review for Scheme Smallholder	√	√	√	√	√
	11.30 – 14.00	BREAK	√	√	√	√	√
	14.00 – 16.30	Document Review for Scheme Smallholder	√	√	√	√	√
	16.30 – 17.00	Wash-up Meeting	√	√	√	√	√
Saturday, 25 February 2023	08.00 – 10.00	Document review	√	√	√	√	√
	10.00 – 10.30	Auditor Meeting / Preparation for Closing meeting	√	√	√	√	√
	10.30 – 12.00	Closing meeting	√	√	√	√	√
	12.00 – 20.00	Travel to Jambi	√	√	√	√	√
Sunday, 26 February 2023		Travel Jakarta - Jambi	√	√	√	√	√

NCR Close-Out Visit assessment plan

Date	Time	Subjects	EPR
Thursday, 31 March 2023	08.00 – 08.30	Opening meeting NCR Close out Visit	√
	08.30 – 10.00	Field verification to scheme smallholder plots	√
	10.00 – 11.30	Document Review	√
	11.30 – 12.00	Closing meeting	√

Section 3: Assessment Findings

3.1 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?	PT Inti Indosawit Subur has explained the certification plan for all of its subsidiaries; indicating all palm oil mills, company-owned estates and scheme smallholder as the supply base.	Complied
Have all the estates and mills certified within five (5) years after obtaining RSPO membership? If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021	There are remaining mill and estate that has not certified yet, Bahilang Estate (Supply bases for Tanah Datar Mill) planned in year 2024 due to still in process of RACP. Teluk Panjie Estate (801ha) as supply bases for Teluk Panjie Mill planned in 2026 due to HGU still in process. Sentral Estate (Supply bases for Gunung Melayu II POM planned in 2024 due to still in process of RACP. Revision of TBP has been approved by RSPO on 19/04/2023	Complied
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available. If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021.	No, there is no new acquisition conducted by PT Inti Indosawit Subur and its subsidiary.	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	Yes, there is time bound plan revision dated 1 July 2021, signed by Management Representative. Justification available, it caused by status of disclosure PT MUP is in progress of review by RSPO. PT MUP will conduct re-audit in 2022. Revision of TBP has been approved by RSPO on 19/04/2023	Complied
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?	Yes, there is time bound plan revision dated 1 July 2021, signed by Management Representative. Justification available, it caused by status of disclosure PT MUP is in progress of review by RSPO. PT MUP has undergo re-audit in Dec 2021. Revision of TBP has been approved by RSPO on 19/04/2023	Complied
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	There is no any isolated lapses in implementation of the plan. There are the changing on the plan due to RaCP process in Bahilang Estate and Sentral Estate and HGU issuance process for Teluk Panji Estate.	Complied

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<p>Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised</p>	<p>There is no fundamental failure to proceed with implementation of the plan. Company has taken action to proceed all uncertified unit to complete the RaCP and to obtained the HGU for Teluk Panji Estate</p>	<p>Complied</p>
<p>Un-Certified Units or Holdings</p>		
<p>No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12.</p>	<p>According to Land Use change analysis, there are several area conversion cacao plantation in Bahilang Estate and Sentral Estate, no primary forest.</p> <p>Bahilang Estate (PT Nusa Pusaka Kencana/NPK). RaCP still under Process. Concept Note still on Progress and submit to RaCP team at Q2 2023. Target to conduct audit at Q1 2024.</p> <p>Sentral Estate (PT Gunung Melayu). RaCP still under Process. Certification audit will be planned on 2024. LUCA submission has been sent on 28 Dec 2020, latest update from RSPO email dated 18 March 2021 to company, LUCA still under review and report needs clarification and still follow up by company.</p> <p>Teluk Panji Estate. HGU for this unit has not been obtained and still under process. Certification audit will be planned on 2026. Latest updated April 2023, HGU still on Progress, since the estate under 2 different province, the final approval must come from National Authority (BPN Pusat).</p> <p>Revision of TBP has been approved by RSPO on 19/04/2023.</p>	<p>Complied</p>
<p>Any new plantings since January 1st 2010 shall comply with the RSPO New Plantings Procedure.</p>	<p>According to Land Use change analysis, there are several area conversion cacao plantation in Bahilang Estate and Sentral Estate, no primary forest.</p> <p>Bahilang Estate (PT Nusa Pusaka Kencana/NPK). RaCP still under Process. Concept Note still on Progress and submit to RaCP team at Q2 2023. Target to conduct audit at Q1 2024.</p> <p>Sentral Estate (PT Gunung Melayu). RaCP still under Process. Certification audit will be planned on 2024. LUCA submission has been sent on 28 Dec 2020, latest update from RSPO email dated 18 March 2021 to company, LUCA still under review and report needs clarification and still follow up by company.</p> <p>Teluk Panji Estate. HGU for this unit has not been obtained and still under process. Certification audit will be planned on 2026. Latest updated April 2023, HGU still on Progress, since the estate under 2 different province, the final approval must come from National Authority (BPN Pusat)</p>	<p>Complied</p>

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<p>Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.</p>	<p>According to internal audit result on December 2020, there is no land conflict occur in PT Mitra Unggul Pusaka – Segati Mill. In addition, the company has been certified for ISPO (Indonesian Sustainable Palm Oil) since December 2016.</p> <p>According to the RSPO RaCP tracker (https://www.rspo.org/certification/remediation-and-compensation/racp-tracker) update 01 September 2022, PT Inti Indosawit Subur has:</p> <ul style="list-style-type: none"> • MU’s with potential liabilities: 4 units • LUCA Submitted (MUs): 4 units • LUCA review completed (MUs): 4 units • Concept Note required (MUs): 3 units • Concept Note submitted (MUs): 2 units • Concept Note approved (MUs): 2 • Concept Note submitted (MUs): 2 • Concept Note endorsed (MUs): 0 • Remediation Plan required (MUs): 4 units • Remediation Plan submitted (MUs): 0 • Remediation Plan approved (MUs): 0 	<p>Complied</p>
<p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2</p>	<p>Internal audit has conducted for Bahilang Estate on 08-09 February 2022, Teluk Panji Estate on 18-23 February 2022 and Sentral Estate on 22-27 August 2022, there is no Labor disputes occur in this management unit. In addition, the company has been certified for ISPO (Indonesian Sustainable Palm Oil) since December 2016.</p> <p>Besides that, interview with management representative who assign as PIC for certification was conducted to know the process of internal audit that has been held.</p> <p>There are no ongoing case/s of grievances or complaint based on RSPO Complaint tracker (https://askrspo.force.com/Complaint/s/casetracker)</p>	<p>Complied</p>
<p>Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1</p>	<p>Internal audit has conducted for Bahilang Estate on 08-09 February 2022, Teluk Panji Estate on 18-23 February 2022 and Sentral Estate on 22-27 August 2022, there is no legal non-compliance occur in this management unit. In addition, the company has been certified for ISPO (Indonesian Sustainable Palm Oil) since December 2016.</p>	<p>Complied</p>
<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,</p>	<p>Internal audit has been conducted for Bahilang Estate on 08-09 February 2022, Teluk Panji Estate on 18-23 February 2022 and Sentral Estate on 22-27</p>	<p>Complied</p>

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<p>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>August 2022. 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 complied 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. - No new plantings are established on local people's land and no HCV area replacement. 	
<p>Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?</p>	<p>According to internal audit 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.</p> <p>According to the RSPO RaCP tracker (https://www.rspo.org/certification/remediation-and-compensation/racp-tracker) update 01 September 2022, PT Inti Indosawit Subur has:</p> <ul style="list-style-type: none"> • MU's with potential liabilities: 4 units • LUCA Submitted (MUs): 4 units • LUCA review completed (MUs): 4 units • Concept Note required (MUs): 3 units • Concept Note submitted (MUs): 2 units • Concept Note approved (MUs): 2 • Concept Note submitted (MUs): 2 • Concept Note endorsed (MUs): 0 • Remediation Plan required (MUs): 4 units • Remediation Plan submitted (MUs): 0 • Remediation Plan approved (MUs): 0 <p>Due to the ongoing process of RaCP, the company has revised it TBP and approved by RSPO on 19/04/2023.</p>	<p>Complied</p>
<p>Have there been any stakeholder (including NGO) consultation conducted?</p>	<p>During internal audit (Bahilang Estate on 08-09 February 2022, Teluk Panji Estate on 18-23 February 2022 and Sentral Estate on 22-27 August 2022), stakeholders consultation already conducted. There is no issue.</p>	<p>Complied</p>

3.2 Progress of scheme smallholders and/or outgrowers

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

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Approved Time Bound Plan

Approved by RSPO on 19/04/2023

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

		Ukui (Plasma)	Ukui & Lubuk Batu Jaya District, Pelalawan & Inhu Regency, Riau	2011	Certified on 1 March 2011 Re-Certified on 1 March 2016 Re-certified in 2021
Tungkal Ulu Mill - PT Inti Indosawit Subur	Pulau Pauh / Penyabungan / Merlung Village, Tungkal Ulu District, Tanjung Jabung Regency, Jambi	Tungkal Ulu Estate	Pulau Pauh / Penyabungan / Merlung Village, Tungkal Ulu District, Tanjung Jabung Regency, Jambi	2012	Certified on 15 August 2012 Re-Certification in August 2017 Re-certified in 2022
		Tungkal Ulu (Plasma)	Renah Mendalo, Merlung, Muara Papalik District, Tanjung Jabung Barat Regency,	2012	Certified on 15 August 2012 Re-Certification in August 2017 Re-certified in 2022
Muara Bulian Mill - PT Inti Indosawit Subur	Singoan / Bukit Sari / Bulian Jaya Village, Muara Bulian / Pematang Pauh District, Batang Hari Regency, Jambi	Muara Bulian Estate	Singoan / Bukit Sari / Bulian Jaya Village, Muara Bulian / Pematang Pauh District, Batang Hari Regency,	2013	Certified on 12 July 2013 Re-Certification in August 2017 Re-certified in 2022
		Muara Bulian (Plasma)	Maro Sebo Ilir District, Batanghari Regency, Jambi	2013	Certified on 12 July 2013 Re-Certification in August 2017 Re-certified in 2022
Topaz Mill – PT Tunggal Yunus Estate	Petapahan Village, Tapung District, Kampar Regency, Riau	Topaz Estate	Petapahan Village, Tapung District, Kampar Regency, Riau	2015	Certified on 30 March 2015 Re-certified in 2020
Taman Raja Mill – PT Dasa Anugrah Sejati	Lubuk Bernai / Kampung Baru / Pelabuhan Dagang / Pematang Pauh Village, Tungkal Ulu District, Tanjung Jabung Regency, Jambi	Taman Raja, Badang & Bernai Estate*	Lubuk Bernai / Kampung Baru / Pelabuhan Dagang / Pematang Pauh Village, Tungkal Ulu District, Tanjung Jabung Regency, Jambi	2015	Certified on 20 February 2015 *Bernai Estate Split From Taman Raja & Badang Estate Since 1 January 2019 Re-certified in 2020
Segati Mill – PT Mitra Unggul Pusaka	Langkan / Penarikan / Tambak / Sotol Village, Langgam District, Pelalawan Regency, Riau	Segati Estate	Langkan / Penarikan / Tambak / Sotol Village, Langgam District, Pelalawan Regency, Riau	2022	Certified on 1 November 2022
		Gondai Estate	Pangkalan Sarik / Baru Village, Langgam / Siak	2022	Certified on 1 November 2022

			Hulu District, Pelalawan / Kampar Regency, Riau		
Penarikan Mill – PT Mitra Unggul Pusaka	Penarikan Village, Langgam District, Pelalawan Regency, Riau	Penarikan Estate*	Penarikan / Tambak Village, Langgam District, Pelalawan Regency, Riau	2022	Certified on 1 November 2022
Tanah Datar Mill – PT Supra Matra Abadi	Tanah Datar Petatal Village, Talawi District, Asahan Regency, North Sumatera	Tanah Datar Estate	Tanah Datar Petatal Village, Talawi District, Asahan Regency, North Sumatera	2015	Certified on 18 May 2015 Re-certified in 2020
		Bahilang Estate	Bahilang Village, Tebing Tinggi District, Serdang Bedagai Regency, North Sumatera	2024	*Bahilang Estate on Process RaCP
Aek Nabara Mill – PT Supra Matra Abadi	S1-S3 / Sukadame Village, Bilah Hulu / Kota Pinang District, Labuhan Batu Regency, North Sumatera	Aek Nabara Estate	S1-S3 / Sukadame Village, Bilah Hulu / Kota Pinang District, Labuhan Batu Regency, North Sumatera	2015	Certified on 6 March 2015 Re-certified in 2020
Teluk Panjie Mill – PT Supra Matra Abadi	Teluk Panjie Village, Kampung Rakyat District, Labuhan Batu Regency, North Sumatera	Teluk Panjie Estate (3,885 Ha)	Teluk Panjie Village, Kampung Rakyat District, Labuhan Batu Regency, North Sumatera	2015	Certified on 21 April 2015 Re-certified in 2020
		Teluk Panjie Estate (801 Ha)		2026	HGU is still in Process
Peranap Mill – PT Rigunas Agri Utama	Simelinyang / Pauh Ranap / Sengkilo Village, Peranap District, Indragiri Hulu Regency, Riau	Peranap Estate	Simelinyang / Pauh Ranap / Sengkilo Village, Peranap District, Indragiri Hulu Regency, Riau	2015	Certified on 7 January 2015 Re-certified in 2020
		Peranap (Plasma)		2016	Certified on 18 August 2016 Re-certified in 2021
Bungo Tebo Mill – PT Rigunas Agri Utama	Tuo Sumai / Sungai Rambai Village, PWK Sumai / Tebo Ulu District, Bungo Tebo Regency, Jambi	Bungo Tebo Estate	Tuo Sumai / Sungai Rambai Village, PWK Sumai / Tebo Ulu District, Bungo Tebo Regency, Jambi	2015	Certified on 3 December 2015 Re-certified in 2020
		Bungo Tebo (Plasma)		2017	Certified on 7 February 2017 Re-certified in 2022
Tanjung Selamat Mill – PT Indo Sepadan Jaya	Kampung Padang Village, Bilah Hilir District, Labuhan	Tanjung Selamat	Kampung Padang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatera	2015	Certified on 26 May 2015 Re-certified in 2020

	Batu Regency, North Sumatra	Pangkalan	Sennah Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	2015	Certified on 26 May 2015 Re-certified in 2020	
Gunung Melayu I – PT Saudara Sejati Luhur	Rahuning Village, Bandar Pulau District, Asahan Regency, North Sumatra	Pulau Maria Estate	Rahuning Village, Bandar Pulau District, Asahan Regency, North Sumatra	2015	Certified on 7 September 2015 Re-certified in 2020	
Gunung Melayu II – PT Gunung Melayu	Gonting Malaha Village, Bandar Pulau District, Asahan Regency, North Sumatra	Aek Tarum & Batu Anam Estate	Gonting Malaha Village, Bandar Pulau District, Asahan Regency, North Sumatra	2015	Certified on 8 July 2015 Re-certified in 2020	
		Sentral Estate		2024	*Sentral Estate on Process RaCP	
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 • Re-certified in 2021 	
		Aek Kuo (2,088 Ha)		Aek Korsik Village, Aek Natas District, Labuhan Batu Regency, North Sumatra	2018	Certified in 2018
		Aek Kuo (501 Ha)			2018	
Negri Lama I Mill – PT Hari Sawit Jaya	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	*3rd party which is excluded from scope of certification	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	2015	<ul style="list-style-type: none"> • Certified on 8 April 2015 • Audit in 2016 as Independent Mill • Re-certified in 2020 	

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 1 Critical Nonconformances; 2 Minor Nonconformities and No Opportunity For Improvement raised. The PT Rigunas Agri Utama – Bungo Tebo POM Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

Non-conformity			
NCR Ref #	2304646-202302-M1	Issued Date	25 February 2023
Due Date	26 May 2023	Closure Date	31 March 2023
Indicator & Category (Critical / Minor)	7.2.5 CRITICAL (Escalated from Minor)		
Statement of Nonconformity:	During field visit it was found the paraquat usage by smallholder member without due diligence process, or when authorized by government authorities for pest outbreaks		
Requirement Reference:	Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat, are not to be used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks. The due diligence refers to: 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. 7.2.5c Which process was applied to verify why there is no other less hazardous alternative. 7.2.5d Process to limit the negative impacts of the application. 7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.		
Objective Evidence:	Based on field visit to smallholder plots at KUD Barokah Plot No 584 M Hodi, Plot No.585 Slamet, Plot No. 697 Mulyadi and KUD Sawit Sumay Makmur, in area Plot No. 151 Harnowo, Plot No. 152 Damono, audit team found confirmed that weeds control in plots was handle by himself using Gramoxone.		
Corrections:	1. Conduct socialization regarding weed control and RSPO requirements for using gramoxone/the active ingredient paraquat to KUD Barokah No. plot 584 M Hodi, plot number 585 Slamet, plot number 697 Mulyadi and KUD Sawit Sumay Makmur in plot number 151 Harnowo, plot number 152 Damono. 2. Make a letter of warning to the smallholder plasma plots at KUD Barokah plot No. 584 M Hodi, plot number 585 Slamet, plot number 697 Mulyadi and KUD Sawit Sumay Makmur at plot number 151 Harnowo, plot number 152 Damono.		

<p>Root Cause Analysis:</p>	<ol style="list-style-type: none"> 1. Lack of farmers' understanding of the risks of using gramoxone and the requirements needed when using gramoxone (limited pesticides). 2. Lack of farmers' understanding of weed control techniques in oil palm plantations. 3. Because farmers are going to carry out replanting, the condition of the gardens is not well maintained, so farmers have the initiative, one of which is by spraying themselves. 4. Initiative farmers spray themselves because there is no longer a TUS program due to replanting, while farmers still expect production from oil palm plantations.
<p>Corrective Actions:</p>	<ol style="list-style-type: none"> 1. Making billboards throughout cooperatives prohibiting self-spray and the use of the active ingredient paraquat before meeting RSPO requirements. 2. Conduct socialization related to weed control and RSPO requirements if using gramoxone/paraquat active ingredient to all KUD. 3. The plasma assistant and the foreman check the condition of the plots (weed condition, spray TUS/self-spray) and make monitoring once every 3 months.
<p>Assessment Conclusion:</p>	<p>Verification: Records was sighted and reviewed such as:</p> <ol style="list-style-type: none"> 1. Socialization of pesticide use in KUD Barokah and KUD Sawit Sumay Makmur on 7 March 2023 attended by 25 smallholders from KUD Sawit Sumay Makmur and 10 smallholders from KUD Barokah (Evidence document No. 01 and 02). 2. Reprimand letter / warning letter dated 7 March 2023 to KUD Barokah's smallholder and KUD Sawit Sumay Makmur's smallholder as mentions in the objective evidence above (Evidence document No. 03 and 04). 3. Field verification and interview with smallholder from KUD Barokah, namely Muslim, Linda and Fatmawati, and KUD Sawit Sumay Makmur, namely Damono and Harnowo. (Evidence document No 10). 4. Installment of warning sign as stated in "Berita Acara Pemasangan Plang Himbauan SSM dan Barokah" dated 4 March 2023 (Evidence document No 05). 5. Socialization of pesticide use in Koperasi Sawit Tambara Jaya and Koperasi Belarik Jaya on 11 March 2023 attended by 58 smallholders from both Koperasi (Evidence document No. 06). 6. Socialization and warning sign installation program for other Koperasi with due date in June 2023 (Evidence document No. 07). 7. Monitoring of scheme smallholder plot by Plasma Assistant such as monitoring report of KUD Sawit Tambara Jaya dated 1 March 2023; monitoring report of KUD Belarik Jaya date 6 March 2023; monitoring report of KUD Sawit Sumay Makmur dated 2 March 2023; monitoring report of KUD Barokah dated 7 March 2023. (Evidence document No. 08). 8. Monitoring program for other Koperasi was seen (Evidence document No. 09) <p>6. Field verification and interview with smallholder from KUD Barokah, namely Muslim, Linda and Fatmawati, and KUD Sawit Sumay Makmur, namely Damono and Harnowo. (Evidence document No 10).</p> <p>CAP has been implemented satisfactorily; NC can be closed.</p>

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Non-conformity			
NCR Ref #	2304646-202302-N1	Issued Date	25 February 2023
Due Date	Next audit (ASA1-2)	Closure Date	-
Indicator & Category (Critical / Minor)	2.1.3 Minor		
Statement of Nonconformity:	Legal boundary pegs in sample of HGU pegs are not visibly maintained.		
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:	During field visit to Bungo Tebo Estate in the boundary of HGU to check HGU pegs number: RAU 04, RAU 05, RAU 06, RAU 07, RAU 08 it was found that the HGU pegs was not visibly maintained; HGU pegs are difficult to find because they are covered in weeds and land cover crops.		
Corrections:	Perform maintenance on HGU stakes: RAU 04, RAU 05, RAU 06, RAU 07, RAU 08.		
Root Cause Analysis:	The working area of the Bungo Tebo Plantation is divided into 2 areas (Bukit Harapan and Lalo) while the officers who have been appointed are domiciled in Bukit Harapan so that the condition of the HGU stakes in the Lalo working area is less controlled and maintained.		
Corrective Actions:	<ol style="list-style-type: none"> 1. Make a memorandum of appointment of Officers to carry out HGU Bench maintenance for the Bukit Harapan Working Area and the Lalo Working Area. 2. Adding to the HGU monitoring format, namely a photo of the condition of the stakes. 		
Assessment Conclusion:	Verification of CAV effectiveness will be conduct in next surveillance audit.		

Non-conformity			
NCR Ref #	2304646-202302-N2	Issued Date	25 February 2023
Due Date	Next audit (ASA1-2)	Closure Date	-
Indicator & Category (Critical / Minor)	7.12.7 Minor		
Statement of Nonconformity:	The status of HCV area determined by PT RAU Bungo Tebo was not well monitored.		
Requirement Reference:	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.		
Objective Evidence:	During field visit to HCV area in Bungo Tebo Estate, Riparian of Sungai Lalo Block D08G and D08H has determined the riparian area is 10 m from left/right side of		

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	the river, however there is no clear boundary and information board to denote the HCV area managed and monitored.
Corrections:	<ol style="list-style-type: none"> 1. Installing riparian stakes in the Lalo River blocks D08G and D08H. 2. Installing HCV area information boards on the Lalo Riparian River blocks D08G and D08H.
Root Cause Analysis:	The working area of the Bungo Tebo Plantation is divided into 2 areas (Bukit Harapan and Lalo) while the officers who have been appointed are domiciled in Bukit Harapan so that the riparian boundary markers and HCV information boards in the Lalo working area are not well controlled and maintained.
Corrective Actions:	<ol style="list-style-type: none"> 1. Prepare a memorandum for the appointment of a riparian Inspection Officer for the Bukit Harapan Working Area and the Lalo Working Area. 2. Adding to the riparian stake monitoring format and HCV area information boards in the form of condition documentation photos.
Assessment Conclusion:	Verification of CAV effectiveness will be conduct in next surveillance audit.

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 #	2127485-202110-M1	Date Issued	03/11/2021
Due Date	03/02/2022	Date of nonconformity Closure	26/01/2022
Indicator & Category (Critical / Minor)	6.7.3 Critical		
Statement of Nonconformity:	It was found that driver (workers) from plasma and outgrower including kernel transport were not using appropriate PPE entering the Bungo Tebo POM which is mandatory area for using PPE (safety shoes & helmet).		
Requirement Reference:	Workers use appropriate personal protective equipment (PPE) which is provided free of charge to all workers in the workplace, to cover all potentially hazardous operations, such as pesticides application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.		

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Objective Evidence:	During field visit to Bungo Tebo Palm oil Mill, it was found that driver from plasma (scheme smallholder) and outgrower including kernel transport were not using shoes but instead using slipper when driving FFB transport and perform weighing in Bungo Tebo POM.
Corrections:	<ul style="list-style-type: none"> Order security to check the completeness of the PPE for the Plasma FFB driver, External FFB and Kernel driver who will enter the Mill area. Provide PPE shoes at the entrance / security post and lend them to FFB Plasma truck drivers, External FFB and Kernel Truck Drivers who do not carry PPE when entering the Mill area.
Root Cause Analysis:	Lack of awareness from the drivers of plasma FFB, External FFB and Kernel transport drivers about the importance of using PPE for occupational safety and health as well as the lack of monitoring and supervision from the company.
Corrective Actions:	<ul style="list-style-type: none"> Provide understanding or awareness to all Plasma FFB transport drivers, External FFB and Kernel transportation drivers about the importance of using PPE. Make a joint commitment with the plasma FFB transportation driver and Kernel transportation driver to always use PPE when entering the Mill area. Monitoring the PPE usage by driver who entering the mill area.
Assessment Conclusion:	The company has conducted briefings and awareness to all external FFB transporting drivers and kernel/CPO drivers about the importance of using PPE.
Effectiveness Closure (for previous audit closed Critical NC):	CAP has been implemented satisfactorily and no recurrence major for this indicator in this CAV audit.

Non-conformity			
NCR Ref #	2127485-202110-N1	Date Issued	03/11/2021
Due Date	ASA 1-1	Date of nonconformity Closure	25 February 2023
Indicator & Category (Critical / Minor)	3.3.3 Minor		
Statement of Nonconformity:	It was found that Best Management Practices of palm oil plantation has not consistently implemented in several smallholder block according to procedure, no monitoring and action taken to address the issue regarding Best Management Practices implementation.		
Requirement Reference:	Records of monitoring and any actions taken are maintained and available		
Objective Evidence:	Based on field visit to smallholder member of Plasma Rigunas Agri Utama, it was found there are still lots of smallholder member plots that are not well maintained according to Best Management Practices procedures. Sample seen: <ul style="list-style-type: none"> - KUD Sawit Sumay Makmur, member No.421 Yitno-Riyanto, No.425 Misdja-Kiki; KUD Tanjung Dani Sakti, member No.672 Anwar-Samhudi weeds condition uncontrol in their plots. - KUD Tanjung Dani Sakti, member No. 648 F Sianipar, No. 675 Sawal Pasaribu, weeds condition uncontrol in their plots. 		

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	<ul style="list-style-type: none"> - KUD Sumay Makmur, member No. 724 Komarudin, weeds condition are uncontrol. - KUD Sawit Sumay Makmur KT 07, member No 430, Pak Jurianto: weeds condition are uncontrol.
Corrections:	Provide direction to smallholder members to continue to maintain plots, especially for harvest access such as circle and path weeding control.
Root Cause Analysis:	Due to the plots of farmers who participated in the replanting program, the farmers no longer took care of the plots
Corrective Actions:	Regular monitoring plot inspections carried out by plasma supervisors.
Assessment Conclusion:	<p>Based on field verification to smallholder plots in this CAV audit, the NC can be closed. This was supported with records such as:</p> <ul style="list-style-type: none"> • Records of monitoring in Koperasi Tanjung Dani Sakti and Sawit Sumay Makmur, no spraying and manuring activities in the last 12 months due to preparation of replanting • Koperasi Sumber Usaha, records of fertilizer were available and in accordance with fertilizer recommendation from the company
Effectiveness Closure (for previous audit closed Critical NC):	N/A

Non-conformity			
NCR Ref #	2127485-202110-N2	Date Issued	03/11/2021
Due Date	ASA 1-1	Date of nonconformity Closure	31 March 2023
Indicator & Category (Critical / Minor)	7.2.5 Minor		
Statement of Nonconformity:	During field visit it was found the paraquat usage by smallholder member without due diligence process, or when authorised by government authorities for pest outbreaks.		
Requirement Reference:	Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat, are not to be used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.		
Objective Evidence:	<ul style="list-style-type: none"> - Based on field visit to smallholder KUD Sawit Sumay Makmur, in area block No.426 Sumanto-Ginting/Bunyamin and No.420 Ruslan-Margito, audit team found freshly used Noxone (a.i. Paraquat) and Metsulindo (a.i. Methyl Metsulfuron). - Based on field visit to KUD Sumay Makmur, KT 34 kavling No. 719 Ngadri confirmed that weeds control in his plots was handle by himself using Gramoxone. - Based on field visit to KUD Sawit Tambara Jaya KT 46, Kav. 2272 Sahori, confirmed that weeds control in his plots was handle by himself and found the 		

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	ex Noxone (paraquat) usage in the field.
Corrections:	Looking for an alternative to paraquat with the active ingredients of glyphosate and floroxyfir/triclofir
Root Cause Analysis:	Some farmers are not satisfied with the results of the TUS team's spray because the weeds that are sprayed don't die quickly
Corrective Actions:	Conducting socialization on the dangers of using paraquat in plasma farmerplots. Make monitoring of plot inspections carried out by plasma supervisor.
Assessment Conclusion:	Escalated to Critical NC in this CAV Audit
Effectiveness Closure (for previous audit closed Critical NC):	N/A

Non-conformity			
NCR Ref #	2127485-202110-N3	Date Issued	03/11/2021
Due Date	ASA 1-1	Date of nonconformity Closure	25 February 2023
Indicator & Category (Critical / Minor)	6.2.7 Minor		
Statement of Nonconformity:	It was found that the company still employs non-permanent workers (PHL) for the main work (Core Work) in harvesting activities and mill processing.		
Requirement Reference:	Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.		
Objective Evidence:	<ul style="list-style-type: none"> - According to list of employee September 2021 there was 41 non-permanent workers (PHL) working as harvester and 19 non-permanent workers (PHL) working as mill processing workers. The non-permanent workers has been employ since 2012 - 2021. - There was a promotion of non-permanent employee in 2021 for 11 non-permanent workers into permanent workers (SKU), however only 1 harvester (PHL) have been promote and the rest of 41 harvester status until October 2021 remain non-permanent workers (PHL). 		
Corrections:	<ul style="list-style-type: none"> • Re-identify harvesting and processing PHL workers and make selections to be proposed for appointment as permanent workers. • Monitor PHL workers, especially for harvesting and processing work. 		
Root Cause Analysis:	<ul style="list-style-type: none"> • High turnover of harvest and process workers, so some harvest and process workers have only worked for a few months. • The analysis and monitoring of PHL workers has not been carried out in accordance with the ratio of labor needs, especially for harvesting. 		
Corrective Actions:	Coordinate with HRD RO3 to make a program for the appointment of PHL workers, especially for harvesting and processing work within the next 5 years.		

Assessment Conclusion:	CAP has been implemented satisfactorily and no escalation to major for this indicator in this CAV audit. Records of CAP implementation such as: <ul style="list-style-type: none"> - Realization of Employee Promotion on 2022 Period in Bungo Tebo Estate and POM - Promotional Program for PHL to SKU for 2 years (2023 – 2025)
Effectiveness Closure (for previous audit closed Critical NC):	N/A

Opportunity for Improvement	
OFI#	Description
OFI 1	<p>OFI Statement: PT. Rigunas Agri Utama – Bungo Tebo POM has progress the information of the indirect FFB supplier to Bungo Tebo POM. Certificate holder has to complete the information regarding geolocation of FFB origins, proof of ownership status, and if relevant valid planting/operational/trading license to allows buying and selling of FFB.</p> <p>Verification / Follow-up actions: PT. Rigunas Agri Utama – Bungo Tebo POM obtains indirect FFB supplied from third-parties who have been identified the source/origin of FFB using the geolocation. This FFB supplier is an indirect source (third party), however, company has carried out identification related to land ownership, trading business licensing and identifying the geolocation from which the FFB originates</p>

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
2127485-202110-M1	Critical	6.7.3	03/11/2021	Closed on 26/01/2022
2127485-202110-N1	Minor	3.3.3	03/11/2021	Closed on 25/02/2023
2127485-202110-N2	Minor	7.2.5	03/11/2021	Escalated to Critical
2127485-202110-N3	Minor	6.2.7	03/11/2021	Closed on 25/02/2023
2304646-202302-M1	Critical	7.2.5	25/02/2023	Closed on 31/03/2023
2304646-202302-N1	Minor	2.1.3	25/02/2023	Open
2304646-202302-N2	Minor	7.12.7	25/02/2023	Open

3.4 Stakeholders and previous land owner / user consultation

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

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

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

Stakeholders contacted		
Type of Stakeholder (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	Stakeholder name / organization	Means of communication (e.g. face to face interview, email, phone interview, comment from public notice)
Governmental Department	Dinas Lingkungan Hidup Kabupaten Tebo Bpk. Muhamad Nuri (Kabid Pengelolaan)	Phone interview
	Dinas Perkebunan, Peternakan dan Perikanan Kabupaten Tebo Bpk. Rafik	Phone interview
	Dinas Tenaga Kerja Kabupaten Tebo Bpk. Ikkal (Bodang Norma Kerja),	Phone interview (Could not be found because there was a meeting with Bupati)
Communities	Village head Bpk. hazri - Tuo Sumay Village Bpk. Purwanto (village secretary) – Pinang Belai Village	Face to face interview
Contractor	CV Selamat Mandiri Pratama Bpk. Lamsintong Manalu (Operational Supervisor)	Face to face interview
NGO	Portal Tebo / Ketua Ketua Lembaga Pemantau Penyelamat Lingkungan Hidup (LP2LH) Bpk. Hari irawan	Phone interview
Union	Serikat Pekerja PUK SPPP-SPSI Sdr. TJ. Purba (Union Chairman of PUKSPPP-SPSI)	Face to face interview
Internal	Gender Committee Ibu Ms. Nurbaiti (Ketua Komite Gender PT RAU)	Face to face interview

Stakeholders comment	
1	<p>Feedbacks:</p> <p>Dinas Lingkungan Hidup Kabupaten Tebo</p> <p>Bpk. Muhamad Nur</p> <ul style="list-style-type: none"> - The company PT Rigunas Agri Utama has obtained an environmental permit and is currently still valid. For example for land applications and temporary permits for hazardous waste storage. - Communication and consultation are carried out well, especially related to environmental management. - The company actively submits mandatory periodic reports for environmental management and monitoring, for example RKL/RPL every semester. - The Environment Agency actively visits the company PT Rigunas Agri Utama to check the implementation of environmental regulations for Palm Oil Mills and Plantations - There was a complaint from the people of Tanjung Dani Hamlet, Tuo Sumay Village on January 2, 2023. The complaint was related to allegations of water pollution in the Batang Sumay River with an indication that the water color had turned black. <hr/> <p>Audit Team verification and response:</p> <ul style="list-style-type: none"> - Environmental Permits have been fulfilled by the company in accordance with environmental regulations i.e. "ANDAL (<i>Analisa Dampak Lingkungan</i>) & RKL-RPL (<i>Rencana Pengelolaan Lingkungan – Rencana Pemantauan Lingkungan Rencana Pemantauan Lingkungan Perkebunan Kelapa Sawit Pola PIR-TRANS dan Pabrik Pengolahan Minyak Sawit PT Rigunas Agri Utama</i>)" datum 2003. - Routine environmental reports are reported to the Environment Agency such as: Tebo Regency, Jambi Province, PPE (Eco-Regional Management Center) Sumatera and the Ministry of Environment. - Guidance and supervision by the Environmental Service are routinely carried out, until November 2021, 1 visit has been recorded. - The company has established a mechanism for handling complaints from external parties in the "Stakeholder Complaint Handling Mechanism" dated 22 April 2019. There is also procedure no. SOP AA-GL-510.1.R0 dated January 1, 2013 regarding the Handling of Public Complaints. The company has also provided a channel for reporting to report in case of violations of the principles and objectives, via email whistleblow@rgei.com or telephone (+62) 81 2755 2528. <p>On January 2, 2023 there was a complaint from the Tuo Sumay community regarding water pollution in the Sumay River caused by a leaking land application pipeline in Block B19f.</p> <p>Some of the actions taken by PT Rigunas Agri Utama based on established procedures, namely:</p> <ol style="list-style-type: none"> a) On January 2, 2023 Askep Bungo Tebo Estate identified the environmental impacts caused by pollution and conducted a site survey (Sumay river). On the same day PT RAU has stopped the flow of Land Application and identified the cause, namely the leakage of the land application liquid pipeline in Block B19f. b) On January 4, 2023; replace leaking pipes and at the same time try drainage under supervision to ensure that there are no more pipe leaks. c) Furthermore, PT RAU held a meeting with the Tuo Sumay Village community to develop an action plan for corrective actions to prevent this from happening again, namely: <ul style="list-style-type: none"> - Monitoring the condition of the land application flow pipe once a month. - Ensure that land application pipelines are completely buried in the ground in each LA pipeline - Planning to make wells for the people of Tuo Sumay Village which is located on the edge of the Sumay River, namely Ulo Gedong Hamlet and Tuo Sumay Village.

Stakeholders comment	
	<ul style="list-style-type: none"> - Perform flatbed washing once a year - Supervise heavy equipment when washing the flat bed by the foreman and system so that there are no broken pipes due to the washing process. <p>d) On January 6, 2023, PT RAU officially reported the incident to the Head of the Tebo Regency Environment and Transportation Service.</p> <p>Based on the complaints from the community mentioned above, PT RAU has responded to these complaints according to established procedures. In this audit, interviews were conducted with the affected community (through the Tuo Sumay Village Head) that PT RAU had responded to complaints from the surrounding community through a good social approach. A field visit was also carried out to block B19f that the leaking pipe had been replaced and had been buried in the ground so that it would not be affected by operational activities in the field and in accordance with recommendations from the DLH Tebo Regency.</p>
2	<p>Feedbacks: Dinas Perkebunan, Peternakan dan Perikanan Kabupaten Tebo Bpk. Rafik</p> <ul style="list-style-type: none"> - The company PT Rigunas Agri Utama regularly submits a Plantation Business Development Report (LPUP) every semester. The second semester of 2022 LPUP report has been reported. - The Plantation business class assessment was carried out in 2021 with result: Class II (Good) with a validity period of 3 years. - The development of the case of overlapping areas in Pinang Belai Village is still ongoing, although there is no conclusion as a solution yet. <p>Audit Team verification and response: Issue related the overlapping area: The last record in the previous audit, that PT. Rigunas Agri Utama fulfilled the summons from the Tebo District Attorney's Office "Tebo District Attorney Letter No.R-33/L.S.17/Dek.1/11/2020 dated 17 November 2020; To the Plasma Manager of PT. Rigunas Agri Utama; Regarding the Request for Information to Appear; November 11, 2020". At the meeting in November 2020, PT. Rigunas Agri Utama was ordered to show a copy of the HGU. The company representative gave a copy of the HGU to the Attorney General's Office.</p> <p>In this surveillance audit, that PT Rigunas Agri Utama received a 2nd summons from the Tebo District Attorney No. SP-171/L.5.17/F1.1/09/2022 dated 13 September 2022 for a request for information regarding alleged irregularities by PT Rigunas Agri Utama which does not have a Cultivation Rights (HGU) location for plantation areas and is included in a Production Forest Area in Serai Serumun District, Tebo Regency from 1997 to 2012 which is scheduled for September 20, 2022 at the Tebo District Attorney's office. In this regard, the representatives of PT Rigunas Agri Utama have responded and complied with the summons for an inquiry on 20 September 2022 with PT RAU Management representative by Mr. Ahmad Bastari (Public Relations- HUMAS) By bringing the relevant documents, namely:</p> <ol style="list-style-type: none"> a. HGU Document Book No. 1/1997 (Filling List 208 No.397/1997 – Filling List 307 No.175/1997 – 06.03.12.03.2.00001) and the amendment letter; Decree of the Minister of Agrarian Affairs of the Head of BPN No. 3-V-2002 dated 28 May 2002 covering an area of 1,604.3 Ha b. HGU Land Book No.1 (Filling List 208 No.396/1997 – Filling List 307 No.173/1997 – 06.03.06.11.2.00001) and amendment documents; Decree of the State Minister for Agrarian Affairs Head of BPN No.5-VIII-1999 dated 3 August 1999 covering an area of 1,047.3 Ha.

Stakeholders comment	
	<p>c. HGU according to SK Head of BPN Regional Office Jambi Province No.03/HGU/BPN.15/2016, dated 5 August 2016 covering an area of 715.63 Ha.</p> <p>d. Forest Release Decree from the Minister of Forestry (No.771/Kpts-II/93, November 18, 1990) covering an area of 22,710 Ha,</p> <p>As for the results of providing information to the Tebo District Prosecutor's Office, there has been no response from the Tebo District Prosecutor's Office. So that until the Surveillance audit was carried out there were no changes because they had not received results from the Tebo District Attorney. The progress will be verified at the time of the next visit.</p> <p>The audit team had attempted to verify the land status with the Tebo Regency BPN. However, the Head of the Tebo Regency BPN was not available for face-to-face meeting and were also not able to be contracted through phone.</p>
3	<p>Feedbacks:</p> <p>Village head</p> <p>Bpk. Hazri - Tuo Sumay Village Bpk. Purwanto (village secretary) – Pinang Belai Village</p> <ul style="list-style-type: none"> - The CSR program is carried out annually and in accordance with the village planning program - There is no indication of abuse of human rights, violence, discrimination and others. Management and development of community oil palm plantations through the scheme smallholder (Plasma), well managed and until now replanting has been carried out through the BPDBPKS program. - Some issue: <ul style="list-style-type: none"> a. Tuo Sumay Village: there is an issue of conflict (overlapping) over an area of 294 parcels of land. Still in progress there is no conclusion that becomes a solution, the community will fully surrender to the authorities, because this problem has been too long but has not yet met the agreement of both parties. b. Dusun Tanjung Dani: there were complaints of water pollution from the Batang Sumay River in January 2023. However, this problem has been resolved properly without causing any other social impact. <p>Audit Team verification and response:</p> <ul style="list-style-type: none"> - The company has built plasma plantations for villages around the plantation (18 KUD). Several KUD has undergone replanting. - The CSR program and realization have been verified based on the Corporate Social Responsibility (CSR) Implementation Report for the Plantation and Palm Oil Mill and Bungo Tebo Plasma Plantation of PT. Rigunas Agri Utama period January-December 2022. - For the issue raised by Tuo Sumay Village and Dusun Tanjung Dani Sakti has been explained in feedback number 2 above.

Stakeholders comment	
4	<p>Feedbacks:</p> <p>Lembaga Pemantau Penyelamat Lingkungan Hidup (LP2LH) Bpk. Hari irawan (Ketua LP2LH)</p> <ul style="list-style-type: none"> - Communication is still being carried out well with PT RAU. - PT RAU always responds positively to complaints from the surrounding community regarding the environment and social issues. Any complaints from the public or other parties are responded to in accordance with the procedures they have. - Communication is maintained well with the surrounding village community as well as community leaders and village government officials (village head). - There was information from the surrounding community (Tuo Sumat Village) about alleged pollution in the Batang Sumay River on January 2, 2023. PT RAU responded to and followed up on this complaint and also reported it to the Tebo District DLH. <p>Audit Team verification and response:</p> <p>Based on the complaints from the community mentioned above, PT RAU has responded to these complaints according to established procedures. In this audit, interviews were conducted with the affected community (through the Tuo Sumay Village Head) that PT RAU had responded to complaints from the surrounding community through a good social approach.</p> <p>A field visit was also carried out to block B19f that the leaking pipe had been replaced and had been buried in the ground so that it would not be affected by operational activities in the field and in accordance with recommendations from the DLH Tebo Regency. (See comments on No. 1 above)</p>
5	<p>Feedbacks:</p> <p>Serikat Pekerja PUK SPPP-SPSI Sdr. TJ. Purba (Chairman of PUK SPPP-SPSI)</p> <p>Gender Committee Ibu Ms. Nurbaiti (Ketua Komite Gender PT RAU)</p> <ul style="list-style-type: none"> - As of 2022, there have been no cases or practices of forced labor or threats against workers. - Never employ underage children (under 18 years old) - No discrimination; Diversity of workers based on religion, ethnicity, gender. There is no evidence of discrimination. - The company has facilitated and provided easy access to affordable food and daily needs for workers and so far there have been no problems. - Implementation of wages in accordance with regulations set by the government for the 2022 and 2023 periods, based on the decision of the Governor of Jambi. For wage adjustments in the 2023 period, the Company will carry out <i>Rapel</i> in May 2023. - There are still workers with PHL status (daily workers) for harvesting and FFB Loader. - Promotion for PHL workers to become permanent workers has been carried out in 2022. - In the 2022 period, no Industrial Relations cases have occurred - The company really values women workers. - PT RIAU has provided convenience/facilities for child daycare (TPA) in each afdeling. - Until now there have been no cases related to sexual harassment or violence against women workers - Pregnancy checks are always carried out every month for workers who use chemicals.

Stakeholders comment	
	<ul style="list-style-type: none"> - The company has conducted a survey to 13 young/new mothers who have babies using a questionnaire related to the needs of breastfeeding mothers which was promoted by the company doctor i.e. dr. Yudy Chandra. The survey was conducted in the period of 21 – 22 December 2022. - with the results of the survey identified that there are several things that young/new mothers need, as follows: - Room for breastfeeding mothers in accordance with Minister of Health Regulation No. 15 of 2013. Company stipulation: that nursing mothers room has been created on 2021 at Company’s Clinic and Day Care Centers, furthers to be carry out routine maintenance of available nursing mothers' rooms. - Time/permission for breastfeeding mothers. Company compliance: permission is given to female employees who are still breastfeeding their children from 10.00-10.30 in accordance with Memorandum No. o. 002/EM-RAU/KBT/MEMO/2/2021 dated February 1, 2021. - The need for nutritious food for mothers and children. Company compliance: providing employee cooperatives that provide special food needs for mothers and babies. <p>Audit Team verification and response:</p> <ul style="list-style-type: none"> - This is a positive response related to employment and workers' rights that has been given by PT RAU. - Several workers' salary slips have been verified for the January 2023 period. PT RAU has set wages according to the situation and conditions of the scope of work in accordance with the laws and regulations. - The implementation of company policies related to discrimination, prevention of sexual harassment and violence, has been verified through interviews with several workers at PT RAU. - It has been verified through an interview with the Head of the District Manpower Office. Tebo, that there were no industrial relations cases in the 2022 period. - Regarding the presence of BHL employees in the Estate and Mills: <p><u>Bungo Tebo Estate:</u></p> <p>In the 2022 period there were 19 harvesters who had been proposed and approved through SK or Memorandum 0234-0259/HR-RO3/MEMO/SK/09/2022 dated 23 September 2022.</p> <p>Bungo Tebo Estate made a Promotion for PHL to SKU Program for 3 years (2023 – 2025) and this program was recognized by the Jambi Province Manpower and Transmigration Office cq. Head of Industrial Relations and Work Requirements Division, as follows:</p> <ul style="list-style-type: none"> • 2023 period; it will be proposed to promote PHL – SKU employees of 28 employees • 2024 period; it will be proposed to promote PHL – SKU employees of 28 employees • 2025 period; it will be proposed to promote PHL – SKU employees of 24 employees <p><u>Bungo Tebo Mill:</u></p> <p>On October 2022; there are 2 promotion of Daily Workers (PHL) to Permanent Workers (SKU) on Bungo Tebo Mill.</p> <p>On November 2022; Proposed by Bungo Tebo Mill Manager to HRD Manager Plt. III through Memorandum No. 152/RAU-PBT/MEMO/11/2022 dated 11 November 2022, totaling 10 employees.</p> <p>Bungo Tebo Mill made a Promotional Program for PHL to SKU for 2 years (2023 – 2024) and this program was recognized by the Jambi Province Manpower and Transmigration Office cq. Head of Industrial Relations and Work Requirements Division, as follows:</p> <ul style="list-style-type: none"> • 2023 period; it will be proposed to promote PHL-SKU employees by 20 employees

Stakeholders comment	
	<ul style="list-style-type: none"> 2024 period; there will be promotions for PHL-SKU employees of 9 employees.
6	<p>Feedbacks: CV Selamat Mandiri Pratama Bpk. Lamsintong Manalu (Operational Supervisor)</p> <ul style="list-style-type: none"> Communication is done well by the management of PT RAU. CV Selamat Mandiri Pratama is a replanting contractor in the Plasma area, always under close supervision regarding the use of PPE, management of environmental aspects and impacts. There has never been a work accident during replanting work. There were no problems with the surrounding village community, so that the completion of the replanting project could be completed according to schedule. <p>Audit Team verification and response: This is a positive response, there are no comments to verify.</p>

List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
Nil	Nil	Nil	Nil	Nil	Nil
PT Rigunas Agri Utama – Bungo Tebo POM has established since 1985 and has planting palm oil since 1994, 1995 and 1996. Currently the palm oil has been replanting since 2016 and finished in 2019. For scheme smallholder, their land already a private properties shown by Certificate of Land (Sertifikat Hak Milik) so there are no previous land owner nor new land owner (bought land from other villager/smallholder) in this audit.					

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

3.5 Impartiality and conflict of interest

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

Formal Signing-off of Assessment Conclusion and Recommendation

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

Report prepared by	Acceptance of Assessment Conclusion
Name: Eko Prastio Ramadhan	Name: Putu Grhyate Yonata Aksa
Company Name: PT BSI Group Indonesia	Company Name: PT Rigunas Agri Utama – Bungo Tebo
Title: Client Manager	Title: Sustainability Operation
Signature: 	Signature: <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i> 
Date: 2 April 2023	Date: 12 April 2023

Appendix A: Summary of Findings

Criterion / Indicator	Assessment Findings	Compliance	
<p>Principle 1: Behave ethically and transparently</p>			
<p>Drive ethical business behaviour, build trust and transparency with stakeholders to ensure strong and healthy relationships.</p>			
<p>Criteria 1.1: The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.</p>			
<p>1.1.1</p>	<p>(C) Management documents that are specified in the RSPO P&C are made publicly available.</p> <p>- Critical (Major) compliance -</p>	<p>In principle and consistently, PT RAU has applied related to the determination of documents that can be accessed by the public. Based on interviews with several stakeholders at the time of the audit (Pinang Belai Village secretary, Tuo Sumay Village Head and CV Selamat Mandiri Pratama replanting contractor) that they gained access to documents when needed.</p> <p>PT Rigunas Agri Utama has made a list of documents that can be accessed by the public, updated as of September 10, 2019, made by Public Relations (Bpk M. Bastari) and known by Group manager (Bibit Sembiring) and reviewed on October 24, 2022. This document is recorded in the List of Documents and Information for Public Access of PT Rigunas agri Utama, this determination is based on Law no. 14 of 2008 concerning Openness about public information, including:</p> <ol style="list-style-type: none"> 1. AMDAL 2. Laporan RKL-RPL 3. Social Impact Assessment 4. HCV Identification 5. Locations permit, Land licensing (Location permit, principle permit, IPKH, HGU Certificate) 6. IMB – Izin Mendirikan Bangunan; Building Permit 	<p>Complied</p>

		<ol style="list-style-type: none"> 7. Environmental licensing including Pollution prevention and reduction management plans 8. Licensing Machinery Factory - Perizinan Mesin-Mesin Pabrik 9. Realization and Program P2K3 Report - Laporan Pelaksanaan P2K3 10. LPUP (Laporan Perkembangan Usaha Perkebunan) PT Rigunas Agri Utama both of Inti and Plasma 11. Document of Conservation of Management Plan 12. Environmental Management Plan 13. CSR Management Plan 14. FFB Pricing 15. Land Burn Report Land Burn Report 16. Procedure of Complaint and also Employee complaint logbook and stakeholder complaint. 17. Recording of deliberation process and results of compensation 18. Public Summary Report RSPO from CB 19. Continuous improvement program 20. Organisation Policy including human right policy 21. Document of Procedure 22. Employment report <p>Several documents that cannot be accessed by the public except by related government agencies include: documents related to taxation, deliberation processes and results of land compensation and company financial reports. Verification of several documents Request for information from stakeholders and all of them have been responded to in accordance with established procedures, an example of verification of documents Request for information is presented in indicator 1.1.2 below.</p> <p>Scheme smallholders</p>	
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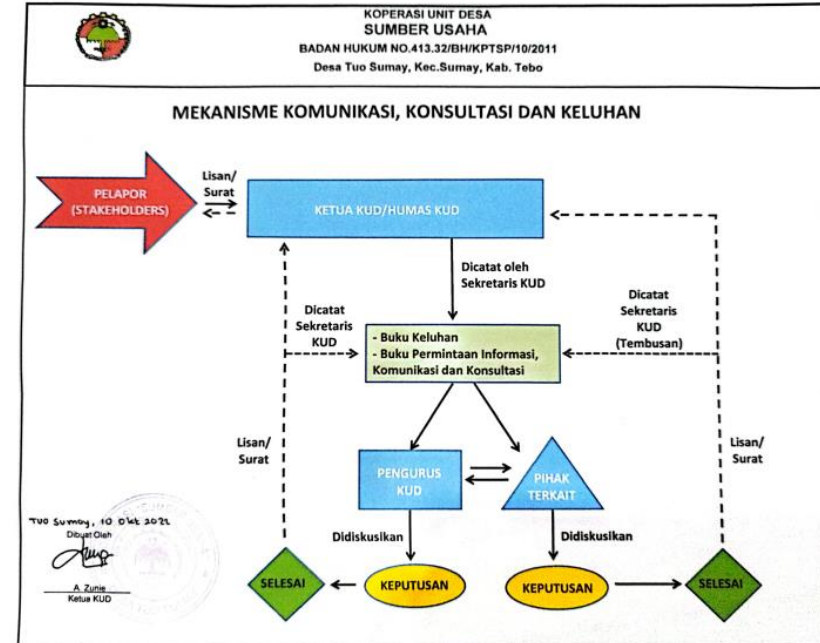
RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

		<p>The list of information that can be access by relevant stakeholders in cooperative/KUD available record on "List Dokumen dan Informasi untuk Diakses Publik Koperasi Sawit Bina Tani", Informasi yang Bisa Diakses Publik Koperasi Sumber Usaha", Informasi yang Bisa Diakses Publik Koperasi Tanjung Dani Sakti, Informasi yang Bisa Diakses Publik Koperasi Barokah" and "List Dokumen dan Informasi untuk Diakses Publik Koperasi Sawit Sumay Makmur". This document has revised on December 2022, such as:</p> <ol style="list-style-type: none"> 1. "Akte Pendirian Koperasi" – Cooperative establishment deeds; 2. Social Impact Assessment; 3. "Buku RAT" – Annual cooperative meeting records; 4. "Identifikasi HCV" – HCV identification; 5. "Sertifikat tanah (SHM)" – smallholder land certificate; 6. "SOP agronomi" – Standard Operating Procedure for Agronomy ; 7. "IMB" – Building permit; 8. "Pelaksanaan K3" – health and safety policy and implementation; 9. "Dokumen CSR" – Cooperative Social Responsibility document; 10. "Pajak dan retribusi" – tax and retribution record; 11. "Kebijakan Koperasi" – Cooperative Policy Book; 12. Public Summary Report from Certification Body; 13. "Identifikasi dan Pengurangan Sumber Polusi" – Identification of pollution source and Pollution reduction plan; 14. "Logbook Keluhan" – Complaint logbook; 15. "Mekanisme penanganan konflik area plasma" – Mechanism for conflict resolution in smallholder area; 16. "Mekanisme keluhan, konsultasi dan komunikasi" – Mechanism for complaint, consultation and communication; 	
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		17. "Program Perbaikan Terus-menerus" – continuous improvement program;	
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders. - Minor compliance -	Some information/documents including established procedures are presented in Indonesian language which is easy to understand. Based on interviews with several stakeholders (e.g. Head of Village: Tuo Sumay Village, and Sekdes Pinang Belai Village) as well as government agencies (plantation services and environmental services) and NGOs (LP2LH) stated that obtaining information and documents can be done by sending a letter request to the management of PT RAU. Information and documents are presented in Indonesian so that they can be understood by other parties. This includes the presentation of reports on employment, environment and others in Indonesian.	Complied
1.1.3	(C) Records of requests for information and responses are maintained. - Critical (Major) compliance -	<p>The certificate holder has established standard procedures related to request information, namely: Procedure No. AA-GL-5008.1-R1 dated 22 August 2011 regarding local public communication/consultation mechanisms and information services for interested parties, which in this procedure explains that responses to requests for information and consultation are carried out within 14 working days.</p> <p>All requests for information and consultations are recorded in a log book, namely the Logbook of Requests for Information and Responses to Requests for Information of PT Rigunas Agri Utama. Requests for information will then be recorded in the logbook by the public relations officer/HUMAS (Bpk. M. Bastari). Requests for information have been responded to in accordance with established procedures, namely not later than 14 working days. Once fulfilled, records of requests for information will be kept for 3 years.</p> <p>In the 2022 period, there are 3 requests for information from stakeholders that must be responded to, including:</p> <ol style="list-style-type: none"> 1. Request for information from Sultan Thaha Saifudin State University Jambi on 19 April 2022 through letter No. B-1056/D.V/D.V.I/PP.00.1/04/2022 regarding Requests for data for 	Complied

		<p>research, the management of PT RAU responded on April 20, 2022 by providing an opportunity to conduct research to Ms. Lisa Febriyanti related to the implementation of CSR at PT RAU.</p> <ol style="list-style-type: none"> 2. Request for information from Badan Pengelolaan Keuangan dan Pendapatan Daerah Tebo Regency on 5 July 2022 through letter No. 133/SPT/BPKPD/VI/2022 regarding BBM user data collection in the company, the management of PT RAU responded on 12 July 2022 by providing the data BBM user on period January – June 2022. 3. Request for information from Kejaksaan Negeri Tebo Regency on 13 September 2022 through letter No. B-1695/L.5.17/Fl.1/09/2022 regarding request of statement, the management of PT RAU responded on 20 September 2022 by sent a PT RAU management representative on behalf of Mr. Andreas and directly provided a response letter and came to the prosecutor's office to provide information. <p>Based on document verification and interviews with stakehokdert, PT Rau's management has responded to every request for information in accordance with established procedures.</p> <p>Smallholder</p> <p>Cooperatives or plasma plantations/partnerships with PT RAU have implemented information, communication and response procedures in accordance with established procedures whereby responses to requests</p>	
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for information from stakeholders are no more than 4 days.



Cooperative have recorded the information request and their response in Logbook.

- KUD Sawit Sumay Jaya: has been recorded 5 information requests in 2022 period, all have been responded. For example: On 28 January 2022 from Ahmad (FFB Transporter) asking the receipt of FFB at the PT RAU Mill on Sunday 30 January 2022; responded by cooperative on 28 January 2022 stating that the PT RAU factory will be open to receive farmers' FFB until 14.00 pm.
- KUD Barokah has been recorded 6 information requests in 2022 period, all have been responded. For example: On 11 July 2022

		<p>from Rambahan Village Office staff asking for assistance with heavy equipment to repair village roads; An information request was submitted by KUD Barokah to PT RAU on July 11, 2022 regarding the borrowing of heavy bakhoe loader equipment by Rambahan Village and PT RAU has agreed to it.</p> <ul style="list-style-type: none"> ○ KUD Bina Tani has been recorded 6 information requests in 2022 period and all requests have been responded. For example: On 13 August 2022 information request from Muklis (farmer), asking the preparation for fertilization in the second semester of 2022; a response from the SMM Cooperative that the preparation of the fertilizer material has been processed and is still being transported to PT RAU. ○ KUD Sawit Sumay Makmur has been recorded 5 information request in 2022 period and all information request have been responded. For example: On 8 September 2022, information request from Ansori on behalf of Pinang Belai village community asking cleaning of clogged village 'axis roads'; The information request was responded to on September 9, 2022 by stating that the ditch would soon be repaired using heavy equipment from PT RAU. 	
<p>1.1.4</p>	<p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official.</p> <p>- Critical (Major) compliance -</p>	<p>Bungo Tebo POM & Estate:</p> <p>Communication and consultation procedures have been consistently implemented by PT RAU, where processes and mechanisms related to requests for information from stakeholders, responses and mechanisms for consultation with stakeholders have been well implemented in accordance with established procedures.</p> <p>The Company has 3 procedures related to communication, information and consultation, namely:</p> <ul style="list-style-type: none"> • Penanganan Permintaan Informasi Stakeholder (SOP AA-GL- 5008.1-R1, dated 22 Aug 2011). Which explains the company responses against all information request sent by stakeholders including 	<p>Complied</p>

		<p>response time of 14 working days after information request accepted</p> <ul style="list-style-type: none"> • Penyampaian dan Penyelesaian Keluhan Karyawan (internal) SOP AA-HR- 308.5-R1, dated 1 December 2019. Ensuring the anonymity profile. • Penanganan Keluhan Masyarakat (SOP AA-GL-510.1-R0, dated 1 Jan 2013). <p>The responsibility related to the communication and consultation for Bungo Tebo Group (Mill, Estate and Smallholders) is Mr. Ahmad Bastari as nominated management official with letter Memorandum No. 037/HR-RO3/MEMO/11/2018 from Manager KLO dated 6 November 2018 related Reassignment of Bpk. Ahmad Bastari as Public Relations at PT Rigunas Agri Utama until this surveillance audit preformed.</p> <p>The above procedure was conveyed and explained to relevant stakeholders through a meeting with all PT RAU’s stakeholders on 23-24 May 2022. This socialization was attended by FFB suppliers (both plasma and non-plasma), CPO and kernel transporters (PT Trans Jaya Pertama), contractors (including the CV Selamat Mandiri Pratama replanting contractor) and other stakeholders including (community and leaders in the surrounding villages including head of villages).</p> <p>Based on interviews with several stakeholders, including: the replanting contractor (on behalf of Mr. L. Manalu) and several village heads (Mr. Hazri and Mr. Purwanto), that they are quite familiar with the processes/procedures related to the delivery of information and communication. In general, they will submit it to the Public Relations of PT RAU (Mr. A. Bastari). Based on the verification of requests for information submitted by stakeholders (1.1.3 above) that PT RAU has implemented a process of communication and response to information in accordance with procedures.</p> <p>Smallholders:</p> <p>Communication mechanism has been established and documented inside “Mekanisme Komunikasi, Konsultasi dan Keluhan”. Stakeholder and/or</p>	
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		<p>smallholder farmer can write down in guest list and recorded in record book. Answer can be given by cooperative chairman or upon discussion for consensus.</p> <p>The decision was informed both verbal and in written to stakeholder and/or smallholder farmer. Administration officer from cooperative records down any decision being informed to stakeholder and/or smallholder member.</p> <p>Koperasi Tanjung Dani Sakti have "Kebijakan Koperasi Saeit Tambara Jaya" signed on 4 January 2021; the policy stipulates on point 15 "Menyediakan informasi yang memadai bagi para pihak sesuai dengan hukum yang berlaku tentang isu lingkungan, sosial, kesehatan dan keselamatan kerja" – to provide sufficient information for interested parties in line with legal requirements related to environment, social, occupational health and safety issues.</p> <p>KUD Sumber Usaha have "Kebijakan KUD Sumber Usaha" signed on 4 January 2021; the policy stipulates "Menyediakan informasi yang memadai bagi parapihak sesuai dengan hukum yang berlaku tentang isu lingkungan, sosial, kesehatan dan keselamatan kerja" – to provide sufficient information for interested parties in line with legal requirements related to environment, social, occupational health and safety issues.</p> <p>KUD Sawit Sumay Makmur have a procedures about communication as documented in "Prosedur Mekanisme Komunikasi, Konsultasi dan keluhan" dated 10 October 2022 stated to all relevant parties who want get information they need to send a written request letter or come to Koperasi office.</p> <p>KUD Barokah have "Kebijakan KUD Barokah" signed on 4 January 2021; the policy stipulates "Menyediakan informasi yang memadai bagi parapihak sesuai dengan hukum yang berlaku tentang isu lingkungan, sosial, kesehatan dan keselamatan kerja" – to provide sufficient information for interested parties in line with legal requirements related to environment, social, occupational health and safety issues.</p>	
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		<p>Based on interviews with several stakeholders including: Head of Pinang Belai Village (represented by the Village Secretary), Head of Tuo Sumay Village and several replanting contractors, that the application of procedures regarding information and communication has been implemented properly and in accordance with the procedures that have been submitted. Stakeholders acknowledged that PT RAU's plasma Cooperative/KUD had submitted procedures related to communication and information during meetings at their respective village offices in early 2022.</p>	
<p>1.1.5</p>	<p>An up-to-date list of contacts and detailed stakeholder information is available along with designated representatives. - Minor compliance -</p>	<p>BungoTebo POM and Estate, Scheme Smallholder: PT RAU and smallholders have compiled and made a list of stakeholders updated as of January 2023, the list is grouped into provinces, districts, sub-districts including local and national community social organizations (NGOs) (local: LSM Merah Putih, LP2LH while National NGO: Sawit Watch, WWF, Greenpeace Southeast Asia). The list of stakeholders presented in detail about the address, name of person and phone number and also position and title, the list is including of Environment Agency of Tebo Regency, Labor Department of Tebo Regency, Village Head of Sumay Dusun Tanjung Dani, District Head of Serai Serumpun, Village Head of Sekutur Jaya, Village Head of of Teluk Singkawang and Village Head of Pulau Temiang. List of Stakeholders, updated in January 2023, e.g:</p> <ul style="list-style-type: none"> • Government: Regent of Tebo; House of representative Tebo; Plantation, Livestock and Fisheries Office; Office of Cooperatives, Trade, Industry and Manpower, Environmental Service, BPJS Kesehatan Tebo Branch, BPJS Ketenagakerjaan, Tebo National Land Agency. • Public figure: District Head of Sumay, District Head of Serai Serumpun, Police office of Serai Serumpun, Police office of Sumay, Military office of Tebo Tengah, Danramil Tebo Ulu, Babinsa Desa Tuo Sumay, Puskesmas Sumay, Puskesmas Serai Serumpun, Lembaga 	<p>Complied</p>

		<p>Adat Tuo Sumay, Kades SP1- SP7, Kades Dusun Tuo, Kades Teriti, Kades Kandang, SPSI PT RAU.</p> <ul style="list-style-type: none"> • NGOs: local: LSM Merah Putih, LP2LH while National NGO: Sawit Watch, WWF, Greenpeace Southeast Asia. 	
<p>Criteria 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.</p>			
<p>1.2.1</p>	<p>A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.</p> <p>- Minor compliance -</p>	<p>PT. Rigunas Agri Utama – Bungo Tebo POM has prepared a written policy to commit to a code of ethical conduct and integrity in all operation and transactions though Company Policy “Kebijakan Perusahaan”, signed by Managing Director on 1 December 2019. Up to this surveillance audit, there have been no changes to the contents of this code of ethics policy.</p> <p>The policy mentioned company’s commitment to uphold and respect code of ethical conduct in all operation; “the company is committed to conducting ethical conduct in the business of all transactions and business operatives, throughout all forms of corruption, bribery and fraud in the use of funds and resources”.</p> <p>The policy has been disseminated to all workers on 07 February 2022, 17 April 2022 and 17 July 2022 and also to all stakeholder and contractors on 9 October 2022. The company policy is available on notice board.</p> <p>Based on interview with workers, during stakeholder consultation, it was noted that worker has a basic understanding of company policy related to code of ethical conduct and can explain using language and parables that can be understood.</p> <p>In the contractual agreement with the contractor, described in relation to business ethics measures including fraud, corruption, and conspiracy in the casual Employment Agreement. For example:</p> <ul style="list-style-type: none"> - Perjanjian Borongan – Employment Agreement No. 037/E3KBT/01/20dated 2 January 2020 on behalf of Nurbaiti for transportation school bus. This contract states the code of business ethics in article 9; Responsibility. - Transport Agreement “Perjanjian Pengangkutan” No.154/ E3KBT/ 03/ 	<p>Complied</p>

		<p>2021 and addendum I No. 027/L3KBT/01/22 dated 1 February 2022 between PT. Rigunas Agri Utama and Padli. Scope of work agreement: transportation of pebble/rock, material, top soil for nursery, etc. This contract states the code of business ethics in article 13; manipulation/conspiracy.</p> <p>Based on an interview with the head of the trade union, Mr. T.J. Purba, that in the process of recruiting workers, there are no practices that are contrary to the code of ethics, for example: bribery, charging recruitment fees that reduce the wages that will be received. In the recruitment process for PT RAU workers, it has also been conveyed through a work contract/work agreement on the first day the worker starts work.</p> <p>Scheme Smallholder:</p> <p>PT RAU's smallholders are still consistent in carrying out the policies set by each Cooperative/KUD. The smallholder scheme has set a policy for each cooperative. The cooperative has "Kebijakan Koperasi Sawit Sumay Makmur" signed 15 January 2021;</p> <p>"Kebijakan Koperasi Sawit Makmur" signed 15 January 2021; "Kebijakan Koperasi Belarik Jaya" signed 15 January 2021; "Kebijakan Koperasi Sawit Tambara Jaya" signed 15 January 2021; "Kebijakan Koperasi Sumay Jaya" signed 15 January 2021; "Kebijakan Koperasi Sumber Usaha" signed 15 January 2021; "Kebijakan Koperasi Tanjung Dani Sakti" signed 15 January 2021; These Cooperative Policy has established policies related to:</p> <ul style="list-style-type: none"> - Fulfilments of legal requirements that apply in the implementation of activities in cooperatives. - Ethical conduct in doing business in all business transactions and operations - Respect human rights by treating all KUD employees and farmers fairly. - Forbid child to work in every activity. - Prevent sexual harassment and various forms of violence against 	
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		<p>women.</p> <ul style="list-style-type: none"> - Respect every KUD employee or farmer to form or become a member of a trade union and ensure the confidentiality of the reporter (Whistle-blower). - Respect human rights defenders (HRD) without giving threats and intimidation. - Do not provide work under threats, sanctions or penalties where workers do not have the freedom to agree to the implementation of the work. <p>Evidence seen:</p> <ul style="list-style-type: none"> • KUD Barokah Policy, which was published on 5 January 2022 and this policy has been socialized to all its members on 13-15 June 2022. The attendant list can be demonstrated during the audit. • KUD Sawit Bina Tani Policy has set on 5 January 2022 and has been socialized to all its farmers' member on 9-11 March 2022. During the audit, the socialization agenda and participant attendance can be shown • KUD Sumber Usaha Policy has set on 5 January 2022 and has been socialized to all its farmers' member on 9-11 March 2022. During the audit, the socialization agenda and participant attendance can be shown • Koperasi Sawit Tanjung Dani Sakti Policy, which was published on 5 January 2022 and this policy has been socialized to all its members on 10-12 May 2022. The attendant list can be demonstrated during the audit. • KUD Sawit Sumay Makmur Policy has set on 5 January 2022 and has been socialized to all its farmers' member on 7-9 March 2022. During the audit, the socialization agenda and participant attendance can be shown 	
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		<p>Based on interviews with several sample farmers (Tanjung Dani Sakti Cooperative: 13 samples, Sumber Usaha Cooperative: 12 samples, Sawit Bina Tani Cooperative: 14 samples, Sawit Sumay Makmur Cooperative: 25 samples and Barokah Cooperative: 17 samples) that in general and through language which is simple, they understand enough and can explain related to the Cooperative policies that have been set.</p>	
<p>1.2.2</p>	<p>A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. - Minor compliance -</p>	<p>PT. Rigunas Agri Utama – Bungo Tebo POM and smallholder has prepared a written policy to commit to a code of ethical conduct and integrity in all operation and transactions though Company Policy “Kebijakan Perusahaan”, signed by Managing Director on 1 December 2019. Up to this surveillance audit, there have been no changes to the contents of this code of ethics policy.</p> <p>The policy mentioned company’s commitment to uphold and respect code of ethical conduct in all operation; “the company is committed to conducting ethical conduct in the business of all transactions and business operatives, throughout all forms of corruption, bribery and fraud in the use of funds and resources”.</p> <p>The policy has been disseminated to all workers on 07 February 2022, 17 April 2022 and 17 July 2022 and also to all stakeholder and contractors on 9 October 2022. The company policy is available on notice board.</p> <p>To ensure the implementation of company policies related to this code of ethics, the company has an internal control system that routinely conducts internal audits (VA: Visit Agronomy) every year. The last internal audit was carried out on 27-30 September 2021 and the organization has made corrective action plan as a result of the VA, all issues have been closed in October 2022. The results of this VA visit showed that there were no actions that violated the company's code of ethics: bribery, corruption, bribery etc because the findings was about agronomy operational activities such as FFB quality, FFB transport more than 24 hours and etc.</p>	<p>Complied</p>
<p>Principle 2: Operate legally and respect rights</p>			

Implement legal requirements as the basic principles of operation in any jurisdiction.			
Criteria 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	<p>(C) The unit of certification complies to relevant regulations.</p> <p>- Critical (Major) compliance -</p>	<p>Bungo Tebo POM, Estate and Smallholder</p> <p>The company and smallholders have shown compliance to applicable national and ratified international regulations, in aspects of legality, operational practices, OHS, employment, and environmental.</p> <p>In term of best management practices, it was known that estate and mill and smallholder management have implemented several pursuance with Indonesia laws and regulations, for example has conducting mechanical or zero burning method during land clearing, oil palms planted were derived from official high quality seeds (DxP) producers recognized by the government of Indonesia. Furthermore, estate (each unit management) has implementing integrated pest management, biological control and only used pesticides listed on government website pesticide.id.</p> <p>In legality aspect, the company has shown the legal compliance toward Indonesia law such as land title (HGU) and plantation business permit (IUP) that will be described in more detail in indicator 4.4.1</p> <p>In worker welfare aspect it's known that the units have paid the employees wage in accordance with applicable regulation. In OHS Aspect the company has established the structure for guiding committee for occupational health and safety in each management unit.</p> <p>Furthermore, in environmental aspect the company has EIA document that approved by government, have hazardous and toxic waste storage issued by relevant agencies.</p>	Complied
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>Bungo Tebo POM and Estate</p> <p>PT. Rigunas Agri Utama referred to SOP of Regulation Compliance "SOP Pemenuhan Peraturan Perundang- undangan dan Perubahannya No.AA-GL-5001.1-R0" dated 5 December 2009. The evaluation of laws and</p>	Complied

	<p>- Minor compliance -</p>	<p>regulation mechanism:</p> <ul style="list-style-type: none"> - Law/ regulation owner will inform/announce of new laws/regulations. Information dissemination can be of different format. - PIC Law Compliance will extract and obtain hard copy/ soft copy of the newlaws/ regulation. PIC Law Compliance shall perform socialization on the interpretation of new laws and regulation and the implementation foroperational purposes. - Respective Department shall ensure the new laws/ regulations be implemented in form of review and revised policy/ procedure/ work instruction and communicating the changes to relevant parties. <p>Written information on legal requirements for Estate and Smallholders are available in Regulation Evaluation "Evaluasi Kepatuhan Hukum Tahun 2023". Responsible person for updating legal register onsite is Public Relation and Sustainability Officer, under Law Compliance and Social, Security, License Department.</p> <p>The Company has reviewed several regulations that issued in 2021 and 2022, as follows:</p> <ul style="list-style-type: none"> - Act No.11 of 2021 related "Cipta Kerja" / employment enforcement. - Government regulation No. 35 of 2021 related temporary worker (PKWT) - Government Regulation No.36 of 2021 related payment. - Forestry Minister Regulation No. 1 of 2022 related revocation of forestry concession. <p>Scheme Smallholder</p> <p>Since the Plasmas are full managed by the company, the system is following the company's procedure.</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>Bungo Tebo POM and Estate</p> <p>Legal (HGU) boundaries are clearly demarcated and maintained based HGU Map issued by National Land Agency. Based on field observation on</p>	<p>Non-compliance</p>

	<p>- Minor compliance -</p>	<p>HGU stones and land demarcation in Estate, has known that HGU stones has been installed in accordance with the coordinates, and other boundaries such as boundary drain and boundary road were maintained. There was no planting exceed the HGU boundary.</p> <p>The company has conducted semesterly HGU stones monitoring for all certificates of HGU. The monitoring and maintenance for Semester II of 2022 have been conducted based on report on 11 July 2022. All HGU stones are in good condition after maintenance. While monitoring for Semester I of 2023 is in progress.</p> <p>However, during field visit to Bungo Tebo Estate in the boundary of HGU to check HGU pegs number: RAU 04, RAU 05, RAU 06, RAU 07, RAU 08 it was found that the HGU pegs was not visibly maintained; HGU pegs are difficult to find because they are covered in weeds and land cover crops.</p> <p>Scheme smallholder:</p> <p>For smallholder, based on field visit, the boundaries are well demarcated in the form of land title (SHM) stake, path, drain, trees, etc. There is no indication of dispute among the plots as well with external parties.</p> <p>Minor non-conformances :</p> <p>Legal boundary pegs in sample of HGU pegs are not visibly maintained.</p>	
<p>Criteria 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.</p>			
<p>2.2.1</p>	<p>A list of contracted parties is available.</p> <p>- Minor compliance -</p>	<p>Bungo Tebo POM and Estate</p> <p>PT. Rigunas Agri utama – Bungo Tebo Group has a list of contractors and in the form of List of Contractors and FFB suppliers. The contractors on period January 2023 are:</p> <ul style="list-style-type: none"> - Herman Tamsil for split stones supplier. - Nurbaiti for bus rent. - Rudi Hartono for FFB & RFB transporter. 	<p>Complied</p>

		<ul style="list-style-type: none"> - CV Alam Cahaya Cemerlang for excavator rent. - CV Mitra Sahabat Sejahtera for mini excavator rent. - PT Uniteda Arkato for Grader rent. <p>Scheme Smallholder No contractor for scheme smallholder.</p>	
<p>2.2.2</p>	<p>All contract, including those for FFB supply, contain specific clause on meeting relevant legal requirements and this can be demonstrated by the third party.</p> <ul style="list-style-type: none"> - Minor compliance - 	<p>Based on sample of document review of contract agreement with the local contractor, it describes compliance with the applicable regulatory and statutory requirements, states that; The Second Party (Contractor) is obliged to follow the applicable government regulations in providing vehicles and drivers, including but not limited to manpower and tools to carry out work.</p> <p>As well as the attachment to the Work Agreement Letter, it is also mentioned in relation to regulatory and statutory requirements, labour, human rights, which are described in Chapter I. Specifications and Conditions of Work: Point7: The second party (the Contractor) is obliged to comply with the applicable labor regulations, especially with regard to the payment of wages and the age of workers, that is over 18 (eighteen) years of age. As well as complying with the prohibition on the employment of children, forced labor and workers from human trafficking and must comply with the company's business ethics and comply with all certification requirements and standards.</p> <p>In the cooperation contract document with CPO contractors and CPKO, it is explained in the work contract related to compliance with legal requirements and not employing minors in Article 7: Responsibilities and Obligations, explained about the prohibition of employing children, complying with applicable regulations in Indonesia and applying wages in accordance with the regulation.</p> <p>Contractual agreement have been verified are:</p> <ul style="list-style-type: none"> - Herman Tamsil for split stones supplier No. 168/E3KBT/07/2022 - Nurbaiti for bus rent No. 22/E3KBT/07/2022 	<p>Complied</p>

		<ul style="list-style-type: none"> - Rudi Hartono for FFB & RFB transporter No. 28/E3KBT/07/2022 - CV Alam Cahaya Cemerlang for excavator rent No. 35/E3KBT/07/2022 - CV Mitra Sahabat Sejahtera for mini excavator rent No. 52/E3KBT/07/2022 - PT Uniteda Arkato for Grader rent No. 53/E3KBT/07/2022 																																				
<p>2.2.3</p>	<p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour.</p> <p>- Minor compliance -</p>	<p>PT Rigunas Agri Utama has non-plasma (third parties) suppliers and has updated as of November 1, 2022 as follows:</p> <ol style="list-style-type: none"> 1. Pandan Jaya 2. CV Asri Brothers 3. SDR <p>And several contractors who are working with PT RAU until November 2022, as follows:</p> <div data-bbox="1093 790 1937 1109" style="border: 1px solid black; padding: 5px;"> <p>DAFTAR KONTRAKTOR PT. RIGUNAS AGRI UTAMA</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>NO</th> <th>KETERANGAN</th> <th>NOMOR KONTRAK</th> <th>NAMA KONTRAKTOR</th> <th>BERLAKU SAMPAI DENGAN</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Pengadaan Batu Split</td> <td>168/E3KBT/07/2022</td> <td>Herman Tamsil</td> <td>Agustus 2022</td> </tr> <tr> <td>2</td> <td>Sewa Minibus</td> <td>022/E3KBT/07/2022</td> <td>Nurbaiti</td> <td>Desember 2022</td> </tr> <tr> <td>3</td> <td>Pengangkutan TBS dan EFB</td> <td>028/E3KBT/07/2022</td> <td>Rudi Hartono</td> <td>Desember 2022</td> </tr> <tr> <td>4</td> <td>Sewa Alat Berat (Excavator)</td> <td>035/E3KBT/07/2022</td> <td>CV. Alam Cahaya Cemerlang</td> <td>Desember 2022</td> </tr> <tr> <td>5</td> <td>Sewa Alat Berat (Excavator Mini)</td> <td>052/E3KBT/07/2022</td> <td>CV. Mitra Sahabat Sejahtera</td> <td>Desember 2022</td> </tr> <tr> <td>6</td> <td>Sewa Alat Berat (Grader)</td> <td>053/E3KBT/07/2022</td> <td>PT. Uniteda Arkato</td> <td>Desember 2022</td> </tr> </tbody> </table> <p>Tuo Sumay, 1 November 2022 Dibuat Oleh</p>  Sofianto KTU </div> <p>All contractors who work together in plantation operations at PT RAU, have made commitments related to child labor and the prohibition of forced labor. This statement is confirmed in the cooperation contract document, taken as an example:</p> <ol style="list-style-type: none"> 1. The agreement for the transportation of CPO, PK and CPKO on behalf of PT Trans Jaya Pertama is dated 1 December 2020 and will end 	NO	KETERANGAN	NOMOR KONTRAK	NAMA KONTRAKTOR	BERLAKU SAMPAI DENGAN	1	Pengadaan Batu Split	168/E3KBT/07/2022	Herman Tamsil	Agustus 2022	2	Sewa Minibus	022/E3KBT/07/2022	Nurbaiti	Desember 2022	3	Pengangkutan TBS dan EFB	028/E3KBT/07/2022	Rudi Hartono	Desember 2022	4	Sewa Alat Berat (Excavator)	035/E3KBT/07/2022	CV. Alam Cahaya Cemerlang	Desember 2022	5	Sewa Alat Berat (Excavator Mini)	052/E3KBT/07/2022	CV. Mitra Sahabat Sejahtera	Desember 2022	6	Sewa Alat Berat (Grader)	053/E3KBT/07/2022	PT. Uniteda Arkato	Desember 2022	<p>Complied</p>
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		<p>based on the agreement of the parties. In the contract document agreement Article 7; emphasizes that the prohibition of employing underage children and practicing forced labour.</p> <p>2. Contract work for transportation of school children no. 022/E3KBT/01/22 dated 3 January 2022. In this Agreement it is confirmed/stated related to the prohibition of child labor and the practice of forced labor in Article 9; Responsibilities: "Not employing children under the age of 18 and prohibiting forced labor practices.</p> <p>3. FFB Contract Agreement no. 027/E3KBT/01/22 dated 1 February 2022 in the name of Rudi hartono and will be expired on 31 February 2023. Related to child labor and forced labor practices in Article 8; Responsibilities: stated prohibition of employing child labor/under 18 years and prohibition of forced labor practices.</p> <p>Based on interviews with stakeholders (Head of Tuo Sumay Village: Mr. Hazri and Head of Pinang Belai Village: Mr. Purwanto), that there is no indication that PT RAU is practicing forced labor and child labor (under 18 years old).</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>- Critical (Major) compliance -</p>	<p>PT. Rigunas Agri Utama – Bungo Tebo POM does not have direct sourced FFB supplier. The FFB supplier categorized as indirect sourced FFB supplier.</p> <p>For plasma/scheme smallholder directly supply its FFB to company's Mill, however, they are the unit certification of Bungo Tebo POM. Therefore, the plasma is not applicable in this indicator.</p>	Not Applicable
2.3.2	<p>For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in indicator 2.3.1.</p> <p>- Minor compliance -</p>	<p>Bungo Tebo POM and Estate</p> <p>PT. Rigunas Agri Utama – Bungo Tebo POM obtains indirect FFB supplied from third-parties who have been identified the source/origin of FFB using the geolocation. This FFB supplier is an indirect source (third party),</p>	Complied

		<p>however, company has carried out identification related to land ownership, trading business licensing and identifying the geolocation from which the FFB originates.</p> <p>PT. Rigunas Agri Utama send out questionnaire to UD Royal dated 4 January 2021 to get information on legality: has "Sertifikat Hak Milik"/ Land certificate, "seporadik" and other letter to demonstrate legal ownership of land; business permit: have SIUP, NPWP; plantation area zone: In Area Pemanfaatan Lain/APL – non forest area; minimum age: no worker under 18 years; and implementation of minimum wage: paid minimum wage from Jambi province.</p> <p>Trading business permit "Surat Izin Usaha Perdagangan (SIUP) Kecil No.445/05-02/PK/XI/2012 untuk Perusahaan Royal", dated 12 November 2012; manager Yuzep Herman; address Jl. Batang Tebo No.129 blok D RT012/RW004, Kelurahan Cadika, Kecamatan Rimbo Tengah; business type trading oil palm FFB, rubber and transport service.</p> <p>Business registration "Tanda Daftar Perusahaan Royal No.059255202508" dated 12 November 2012; Manager Yuzef Herman, address Jl. Batang Tebo No.129 blok D RT012/RW004, Kelurahan Cadika, Kecamatan Rimbo Tengah</p> <p>Supplier list of FFB supplier UD Royal, has informed 58 outgrowers under the FFB supplier consist of 72 land parcels and total plantation source of 642.8 ha.</p> <p>PT. Rigunas Agri Utama send out questionnaire to Pedasan Jaya Village dated 4 January 2021 to get information on legality: has "Sertifikat Hak Milik"/Land certificate, "seporadik" and other letter to demonstrate legal ownership of land; business permit: has SIUP, NPWP; plantation area zone: In Area Pemanfaatan Lain/APL – non forest area; minimum age: no worker under 18 years; and implementation of minimum wage: paid minimum wage.</p>	
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		<p>Data Petani Muara Tebo Supplier Pedasan Jaya Village, has informed 19 outgrowers under the FFB supplier with 29 land parcels and total plantation source of 142 Ha. For instance, sampel of legal ownership of land for Ridwan (owns 40 Ha oil palm plantation):</p> <ul style="list-style-type: none"> - "Sertipikat Hak Milik No.06.09.03.05.1.0945" dated 25 August 2018 based on mapping "Surat Ukur 0741/06090305/2018" dated 14 August 2018 of 2 Ha for Riduan. Geolocation X 221122 & 9853162 - Sertipikat Hak Milik No.06.09.03.05.1.0779" dated 31 July 2018 based on mapping "Surat Ukur 0682/6090305/2018" dated 23 July 2018 of 1.765 Ha for Riduan. Geolocation X 221122 & 9853162 - "Sertipikat Hak Milik No.06.09.03.05.1.0275" dated 20 June 2014 based on mapping "Surat Ukur 94/05/2014" dated 20 June 2014 of 1.226 Ha for Riduan. Geolocation X 221122 & 9853162 	
<p>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>			
<p>3.1.1</p>	<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> <ul style="list-style-type: none"> - Critical (Major) compliance - 	<p>Bungo Tebo POM and Estate:</p> <p>PT Rigunas Agri Utama has committed to economic and financial sustainability and has documented the working plan in the Financial Budget Plan "Rencana Kerja Perusahaan". The company has set up a business management plan for the next 5 (five) years and the forecast have been well documented in the document "Proyeksi Produk Sustainable & Non-Sustainable PT Rigunas Agri Utama Bungo Tebo" 2023 - 2027. Management plan was set up including FFB from scheme smallholder and independent FFB suppliers. Its management plan includes:</p> <ul style="list-style-type: none"> • FFB Production projection 2023 – 2027. • CPO, PK, production projection 2023 – 2027. • OER, KER projection 2023 – 2027. • Estate Cost Estimation: Upkeep cost, manuring cost, pest and disease 	<p>Complied</p>

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		<p>management cost, pruning cost, census cost, terrace maintenance cost, road and bridge maintenance cost, harvesting cost.</p> <ul style="list-style-type: none"> • Mill Cost, KCP Cost, Selling cost, Bulking cost and Tax portion actual 2022 and projection 2023 – 2027. • Net Profit/Loss. <p>Below are crop projection Bungo Tebo Estate 2023 – 2027.</p> <table border="1" data-bbox="1093 584 1933 732"> <thead> <tr> <th rowspan="2">Ha</th> <th colspan="5">Estimated FFB Production (MT)</th> </tr> <tr> <th>2023</th> <th>2024</th> <th>2025</th> <th>2026</th> <th>2027</th> </tr> </thead> <tbody> <tr> <td>2,490</td> <td>36,736</td> <td>42,575</td> <td>44,278</td> <td>45,981</td> <td>54,496</td> </tr> </tbody> </table> <p>Projection of production Bungo Tebo POM period 2023 – 2027</p> <table border="1" data-bbox="1093 823 1966 1219"> <thead> <tr> <th>Description</th> <th>2023</th> <th>2024</th> <th>2025</th> <th>2026</th> <th>2027</th> </tr> </thead> <tbody> <tr> <td>FFB Processed (MT)</td> <td>270,019</td> <td>273,534</td> <td>274,734</td> <td>281,334</td> <td>281,634</td> </tr> <tr> <td>CPO Production (MT)</td> <td>53,564</td> <td>55,371</td> <td>55,614</td> <td>56950</td> <td>57011</td> </tr> <tr> <td>PK Production (MT)</td> <td>14,851</td> <td>15,046</td> <td>15,112</td> <td>15475</td> <td>15491</td> </tr> <tr> <td>OER (%)</td> <td>19.73</td> <td>20.02</td> <td>20.24</td> <td>20.24</td> <td>20.24</td> </tr> <tr> <td>KER (%)</td> <td>5.50</td> <td>5.50</td> <td>5.50</td> <td>5.50</td> <td>5.50</td> </tr> </tbody> </table>	Ha	Estimated FFB Production (MT)					2023	2024	2025	2026	2027	2,490	36,736	42,575	44,278	45,981	54,496	Description	2023	2024	2025	2026	2027	FFB Processed (MT)	270,019	273,534	274,734	281,334	281,634	CPO Production (MT)	53,564	55,371	55,614	56950	57011	PK Production (MT)	14,851	15,046	15,112	15475	15491	OER (%)	19.73	20.02	20.24	20.24	20.24	KER (%)	5.50	5.50	5.50	5.50	5.50	
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3.1.2	<p>An annual replanting programme projected for a minimum of five years with yearly review, is available.</p> <p>- Minor compliance -</p>	<p>Based on document verification during ASA1_1, the replanting program of PT Rigunas Agri Utama has been completed in 2019, at this moment the certificate holder does not have replanting program for short term.</p>	Complied																																																					

		<p>However, there is replanting program for Scheme Smallholders for Y2022 – 2026 as follows:</p> <table border="1" data-bbox="1093 389 1960 770"> <thead> <tr> <th rowspan="2">Organization</th> <th rowspan="2">Area (Ha)</th> <th colspan="5">Program (Ha)</th> </tr> <tr> <th>2022</th> <th>2023</th> <th>2024</th> <th>2025</th> <th>2026</th> </tr> </thead> <tbody> <tr> <td>KUD Tanjung Dani Sakti</td> <td>220</td> <td>-</td> <td>-</td> <td>220</td> <td>-</td> <td>-</td> </tr> <tr> <td>KUD Sawit Bina Tani</td> <td>238</td> <td>-</td> <td>-</td> <td>126</td> <td>112</td> <td>-</td> </tr> <tr> <td>KUD Sumber Usaha</td> <td>184</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>KUD Sawit Sumay Makmur</td> <td>858</td> <td>414</td> <td>396</td> <td>48</td> <td>-</td> <td>-</td> </tr> <tr> <td>KUD Barokah</td> <td>372</td> <td>-</td> <td>-</td> <td>52</td> <td>228</td> <td>92</td> </tr> </tbody> </table> <p>During ASA1_1 has been verified the realization of the replanting at Scheme Smallholders is 159 Ha namely at KUD Produsen Sawit Sumay Makmur in Y2022 and 82 Ha in KUD Sumber Usaha in Y2020.</p>	Organization	Area (Ha)	Program (Ha)					2022	2023	2024	2025	2026	KUD Tanjung Dani Sakti	220	-	-	220	-	-	KUD Sawit Bina Tani	238	-	-	126	112	-	KUD Sumber Usaha	184	-	-	-	-	-	KUD Sawit Sumay Makmur	858	414	396	48	-	-	KUD Barokah	372	-	-	52	228	92	
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<p>3.1.3</p>	<p>The unit of certification holds management review at planned term according to the scale and nature of the activities undertaken.</p> <p>- Minor compliance -</p>	<p>During ASA1_1 has been verified that PT Rigunas Agri Utama has held management review on 10 May 2022. Management review attended by key personnel e.g., Technical Controller, Senior Manager, Mill Manager, Head Assistant, Assistant and Sustainability Staff. Management review has discussed all required agenda, such as:</p> <ol style="list-style-type: none"> a. Results of internal audits; All nonconformance raised during internal audit has been followed up by the unit, included internal audit result in scheme smallholder b. Customer feedback: there was complaint from customer related to road access from Mill, the road condition are some times slippery and need improvement. Organization has appointed Operational Assistant – POM to coordinate with Traction Assistant for road maintenance. c. Process performance and product conformity; 1. CPKO's OER was 	<p>Complied</p>																																															

		<p>not achieved (by 44.05%) against the budget. It is necessary to monitor the ampere of the press machine regularly; 2. The smooth reception of fruit at the weighbridge is often constrained due to the density of incoming fruit cars so that sometimes there is a commotion between the driver and the security officer. The PBT sorting assistant and the outside fruit receiving assistant coordinate with POS Security for the number of fleets that are weighed in stages.</p> <p>d. Status of preventive and corrective actions; there is action plan that need to be follow up to the TC (Technical Controller) for approval of material purchase.</p> <p>e. Follow-up actions from management reviews: All corrective actions discussed in the previous year have been completed.</p> <p>f. Changes that could affect the management system; there is a plan to add 1 (one) weighbridge at the PK receiving, however it is only for comparison.</p> <p>g. Improvement recommendations: the parking area for CPO, CPKO, PK transporters need to be expanded to provide comfortable parking for the driver. The Operational Assistant is the PIC in that regard.</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>			
<p>3.2.1</p>	<p>(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impact and opportunities of the unit of certification.</p> <p>- Critical (Major) compliance -</p>	<p>During ASA1_1, the certificate holder regularly checks and review the performance of economic, social and environment, then develop and implement action plan for continuous improvement. Monitoring in Bungo Tebo Estate and POM are done by e.g. Visit Agronomy (VA) and Visit R&D and Visit Engineering (VE), verified data for example:</p> <p>a. Visit Agronomy (VA) at Bungo Tebo Estate has conducted on 29 August – 3 September 2021 by Simon Sihotang as per report VA-KBT-AUG-FULL-29082022. The organization has made corrective action plan as a result of the VA, all issues have been closed in</p>	<p>Complied</p>

		<p>October 2022.</p> <p>b. VE at Bungo Tebo POM was conducted in September 2022.</p> <p>Other record of continuous improvement is documented in AAIA (Asian Agri Innovation Award) for Y2022. For example, of Continuous Improvement (CI) recorded in AAIA namely modification of the Kernel Press Machine to the Feed Cage by changing the Feed Cage EK200 to EK300.</p> <p>Continuous improvement for smallholders is their participation in ISPO Certification. The company in process to complete the legal document for each farmer such as STDB (<i>Surat Tanda Daftar Budidaya</i>) and SPPL (<i>Surat Pernyataan Kesanggupan Pengelolaan Lingkungan</i>)</p>	
3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat by Certification Body during Annual Surveillance Assessment by using the RSPO metrics template.</p> <p>- Minor compliance -</p>	<p>RSPO Annual Communication of Progress (ACOP) period 2022 of PT Inti Indosawit Subur has been available in RSPO website under membership number 1-0022-06-000-00. RSPO Metrics Template has been shown and verified during ASA1_1 audit.</p>	Complied
<p>Criteria 3.3: Operating procedures are appropriately documented, consistently implemented and monitored.</p>			
3.3.1	<p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p>Bungo Tebo POM and Estate:</p> <p>During ASA1_1, there is no change of organization’s procedures. PT Rigunas Agri Utama has procedures for estate best agriculture practice, starting from land preparation up to replanting, as follows:</p> <ol style="list-style-type: none"> 1. SOP AA-APM-OP-1100.01-R4 dated 5/09/2016 Nursery. 2. SOP AA-APM-OP-1100.02-R3 10/06/2015 New Planting. 3. SOP AA-APM-OP-1100.03-R2 24/07/2015 Road and Bridge Construction and Maintenance explains road and bridge construction and maintenance. 4. SOP AA-APM-OP-1100.04-R3 07/12/2015 Drainage Construction and Maintenance explains culvert/drainage construction and 	Complied

		<p>maintenance.</p> <ol style="list-style-type: none"> 5. SOP AA-APM-OP-1100.05-R3 23/11/2016 Soil & Water Conservation. 6. SOP AA-APM-OP-1100.06-R5 16/02/2017 Planting cover crops. 7. SOP AA-APM-OP-1100.07-R6 16/02/2017, Oil Palm Planting. 8. SOP AA-APM-OP-1100.08-R6 11/05/2016 Weed control. 9. SOP AA-APM-OP-1100.09. R6 12/06/2017 Fertilizer application. 10. SOP AA-APM-OP-1100.10. R6 23/11/2016 Pests and Disease Control. 11. SOP AA-APM-OP-1100.11. R1 01/02/2009 Pesticide handling and Management. 12. SOP AA-APM-OP-1100.12. R3 23/11/2016 Castration explain cutting all generative product (male flower, female flower, all fruit, to support vegetative growth) – done 5-6 months before being harvested. 13. SOP AA-APM-OP-1100.13. R3 04/03/2016 Pruning. 14. SOP AA-APM-OP-1100.14. R3 16/02/2017 Census and Palm identification. 15. SOP AA-APM-OP-1100.15. R2 01/10/2010 Production census. 16. SOP AA-APM-OP-1100.16. R1 01/02/2009 Consolidation, Provision of support to fallen palm. 17. SOP AA-APM-OP-1100.17. R1 23/10/2014 Water management. 18. SOP AA-APM-OP-1100.18. R3 20/04/2015 Harvesting. 19. SOP AA-APM-OP-1100.19. R1 01/02/2009 FFB Transport. 20. SOP AA-APM-OP-1100.20-R6 16/02/2017 Replanting. <p>During ASA1_1, there is no change of organization’s procedures. Procedures for mill best management practice has been established and documented as well, as follows:</p> <ol style="list-style-type: none"> 1. SOP AA-MPM-OP-1400.02.R2 FFB receiving station. 2. SOP AA-MPM-OP-1400.03.R1 Sterilizer station. 	
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		<ol style="list-style-type: none"> 3. SOP AA-MPM-OP-1400.04.R1 Thresher station and loose fruit separation. 4. SOP AA-MPM-OP-1400.05-R1 Pressing station. 5. SOP AA-MPM-OP-1400.06-R1 Clarification station. 6. SOP AA-MPM-OP-1400.07-R1 Nut and fiber separation. 7. SOP AA-MPM-OP-1400.08-R1 Kernel station. 8. SOP AA-MPM-OP-1400.09-R1 Boiler station. 9. SOP AA-MPM-OP-1400.10-R1 Engine room station. 10. SOP AA-MPM-OP-1400.11-R1 Water treatment station. 11. SOP AA-MPM-OP-1400.12-R1 Laboratorium. 12. SOP AA-MPM-OP-1400.13-R1 Palm oil mill effluent treatment. 13. SOP AA-MPM-OP-1400.14-R2 CPO and kernel bulking and dispatch operation. 14. SOP AA-MPM-OP-1400.15-R1 Preventive maintenance. <p>The mill operational procedures explain the flow process, specification of material and process, machinery and tools required, step-by-step process, control, monitoring and measurement and health and safety requirements.</p> <p>Scheme Smallholder:</p> <p>During ASA1_1, there is no change of organization's procedures. Kebun Plasma Bungo Tebo has established and maintained guidance to perform and monitor the best agriculture practices. The procedures were sighted, for example:</p> <ol style="list-style-type: none"> 1. SOP AA-Plasma-PP-KS-01; Nursery; dated 1 Sept 2011. 2. SOP AA-Plasma-PP-KS-02; Pest and Disease Control; dated 1 Sept 2011. 3. SOP AA-Plasma-PP-KS-03; Fertilizing; dated 1 Sept 2011. 4. SOP AA-Plasma-PP-KS-04; Harvesting; dated 1 Sept 2011. 	
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		<p>5. SOP No.007/DOK/SOP/AA2016; Internal Communication Group Certification.</p> <p>6. SOP No.013/DOK/SOP/AA/2016; Assessment and Inspection Member Group Plantation.</p> <p>7. SOP No. 020/DOK/SOP/AA/2016; FFB Sale Mechanism.</p> <p>8. AA-SOP-06-KLO dated 1 February 2009; Weeds Control.</p> <p>Manager of Kebun Plasma Bungo Tebo in cooperation with Koperasi (Cooperative) has developed training programme Y2022 for Good Agriculture Practise according to the procedure for smallholder.</p>	
<p>3.3.2</p>	<p>A mechanism to check consistent implementation of procedures is in place.</p> <p>- Minor compliance -</p>	<p>During ASA1_1 has verified that the organization has a mechanism to ensuring field implementation consistent with procedures is in place, the mechanism namely by conducting the visit form operation department, verified document for example:</p> <ul style="list-style-type: none"> a. Visit Agronomy (VA) at Bungo Tebo Estate has conducted on 29 August – 3 September 2021 by Simon Sihotang as per report VA-KBT-AUG-FULL-29082022. The organization has made corrective action plan as a result of the VA, all issues have been closed in October 2022. b. VE at Bungo Tebo POM has conducted in September 2022. c. Annual Quality Control visit conducted by Quality Control Assistant, the last visit on December 2022. d. Management Meeting. For example, there is a record of management meeting Bungo Tebo Estate on 10 May 2022 attended by technical controller, group manager, estate manager, field assistant and head clerk. <p>During the ASA1_1 audit, auditor also has carried out interview to QC staff for estate and mill. Through the interview obtain information as follows:</p>	<p>Complied</p>

		<p>a. QC in estate conducted regularly at least once a month. The items that shall verify is quality of harvesting (circle, harvesting path and FFB/loose fruit left), manuring, upkeep in immature area. Last report on January 2023 showed that Bungo Tebo Estate are in 'good' status.</p> <p>b. QC in mill conducted regularly at least once a month (minimum 4 man days). Items to check is for all station in Mill, such as quality of sortation in loading ramp, sterilizer, USB check, LTDS, wet shell, fibre cyclone, temperature in clarification, kernel silo and press station, mass balance of solid and liquid and calibration of CPO/PK production in laboratory. Last report on December 2022 showed that Bungo Tebo POM is in 'good' status.</p> <p>Scheme Smallholder</p> <p>Based on interview with Plasma Manager as ICS Manager in coordination with board of KUD has set the monthly management meeting to discuss issues related to best management practices, social, occupational safety and health, environment, and any other issues. The meeting also discussed the improvements that will be made in the future. The verified document for example on 30 November 2022 in KUD in SP-1.</p> <p>For operational activities (harvesting and manuring), the Plasma Assistant with Foreman conduct daily monitoring to smallholder plots to ensure the activities has complied to procedures. Meanwhile for spraying, because it done by spraying team (TUS) from the company so their compliance against procedure was monitored by Spraying Foreman and Plasma Assistant.</p>	
3.3.3	<p>Records of monitoring and any actions taken are maintained and available.</p> <p>- Minor compliance -</p>	<p>During ASA1_1 has verified that the certificate holder regularly checks and review the performance of economic, social and environment, then develop and implement action plan for continuous improvement. Monitoring in Bungo Tebo Estate and POM are done by e.g. Visit Agronomy (VA) and Visit Engineering (VE), verified data for example:</p> <p>a. Visit Agronomy (VA) at Bungo Tebo Estate has conducted on 29 August – 3 September 2021 by Simon Sihotang as per report VA-KBT-</p>	Complied

		<p>AUG-FULL-29082022. The organization has made corrective action plan as a result of the VA, all issues have been closed in October 2022.</p> <p>b. VE at Bungo Tebo POM has conducted in September 2022. The organization has made corrective action plan as a result of the VA, all issues have been closed in October 2022.</p> <p>c. Annual Quality Control visit conducted by Quality Control Assistant, the last visit on December 2022.</p> <p>d. Management Meeting. For example, there is a record of management meeting Bungo Tebo Estate on 10 May 2022 attended by technical controller, group manager, estate manager, field assistant and head clerk.</p> <p>Document of Action plan for result of VA and VE at Bungo Tebo Estate and POM are available during ASA1_1 audit.</p> <p>Samples of record reviewed during audit :</p> <ul style="list-style-type: none"> • Koperasi Tanjung Dani Sakti and Sawit Sumay Makmur, no spraying and manuring activities in the last 12 months due to preparation of replanting • Koperasi Sumber Usaha, records of fertilizer was available and in accordance to fertilizer recommendation from the company 	
<p>Criteria 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.</p>			
<p>3.4.1</p>	<p>(C) SEIA in new planting or operation including mills, is conducted independently and participatively by involving the affected stakeholders, inclusive of impact assessment from the smallholder/outgrower scheme (if any). The assessment is to be documented.</p> <p>- Critical (Major) compliance -</p>	<p>There is no change in term of the statement of conformity when comparing from the previous audit result. Up to now since previous assessment last year till the date of this audit, no new planting in PT Rigunas Agri Utama – Bungo Tebo plantation area.</p> <p>The company already have document EIA and SIA :</p> <ol style="list-style-type: none"> 1. The previous SEIA was "ANDAL (Analisa Dampak Lingkungan) & RKL-RPL (Rencana Pengelolaan Lingkungan – Rencana Pemantauan Lingkungan Rencana Pemantauan Lingkungan Perkebunan Kelapa 	<p>Complied</p>

		<p>Sawit Pola PIR-TRANS dan Pabrik Pengolahan Minyak Sawit PT Rigunas Agri Utama” datum 2003. The documents have been approved based on “Persetujuan Komisi AMDAL Propinsi Jambi No.273 Tahun 2003” dated 11th July 2003.</p> <p>2. Addendum AMDAL “Rencana kegiatan Pembangunan Kernel Crushing Plant (KCP) dengan Kapasitas Produksi 200 ton/hari, Pembangunan Pembangkit Listrik Tenaga Biogas (PLTBG) yang dihasilkan Tenaga listrik Sebesar 3 MW dan Replanting Dengan Rencana Luas Lahan 2.506 ha di Kecamatan Sumay dan Kecamatan Serai Serumpun Kabupaten Tebo Provinsi Jambi Oleh PT Rigunas Agri Utama. Rencana Pengelolaan Lingkungan Hidup – Rencana Pemantauan Lingkungan Hidup (RKL– RPL)” regarding Development of Kernel Crushing Plant (KCP) with production capacity 200 ton/day, development of electricity power (PLTBG) that produced electricity 3 MW and replanting for 2,506 Ha. The documents have been approved based on Decree of Tebo Regent No.86 Year 2017” dated 2nd February 2017 regarding Environment Permit (Izin Lingkungan) and No.85 Year 2017 dated 2nd February 2017 regarding “Kelayakan Lingkungan”. This documents covers the area of 8,676 Ha (2,551 Ha planted for nucleus estate and 6,116 Ha planted for scheme smallholders), with palm oil mill capacity 60 tons FFB/hour, KCP 200 ton/day, electricity power 3 MW and 2,506 replanting area in the nucleus estate. The area of study covers Tuo Sumay Village, Sungai Rambai Village, Pinang Belai Village (SP1), Sekuntum Jayo Village (SP2), Bukit Pemuatan Village (SP5) and Napal Putih Village (SP6) – Sumai sub-district, Tebo Regency, Jambi Province, year of study 2016.</p>	
<p>3.4.2</p>	<p>For the unit of certification, a SEIA is available and social and environmental management plan and its monitoring have been developed with participation of affected stakeholders.</p> <p>- Minor compliance -</p>	<p>There is no change in term of the statement of conformity when comparing from the previous audit result. Up to now since previous assessment last year till the date of this audit, the social environmental management plan have been developed with participation of affected stakeholder. Details of management plan can be seen in document</p>	<p>Complied</p>

		<p>"Rencana Pengelolaan Lingkungan" and dokumen "Rencana Kerja Lingkungan" consisted of:</p> <ol style="list-style-type: none"> 1. Significant Impacts: Mobilization of heavy equipment and material during replanting; decrease of air quality; Program: air quality are maintained (parameter SO₂, CO, NO₂, O₃, HC, PM₁₀, PM_{2.5}) under standard based on PP No.41/1999 regarding Air Pollution Control. 2. Significant Impact: increase of noise level; Program: Decree of Minister of Environment No. KEP-48/MENLH/11/1996, regarding standard of noise level; 3. Significant Impact: decrease of community health; Program: increase community sanitary environment, clean and healthy attitude of community. 4. Significant Impacts: Soil erosion due to replanting activity; Program: <ul style="list-style-type: none"> - Make terrace in areas with a slope > 12° - Planting legume cover crop - Make a trench subside in lowland areas - Make a stop in the area of the bunch teresan - Making the hoof to areas with a slope < 12° 	
<p>3.4.3</p>	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in participatory way. - Critical (Major) compliance -</p>	<p>The social and environmental management and monitoring plan has been implemented, reviewed and updated regularly in participatory way. The frequency of environment monitoring or analysis is per semester and annually, based on identification in document "Rencana Pengelolaan Lingkungan" and dokumen "Rencana Kerja Lingkungan". The analysis covered :</p> <ul style="list-style-type: none"> • Air quality and noisy monitoring from FFB processing performed by emission measurement against Boiler and generator each semester, ambient air quality measurement each semester, noisy measurement (indoor and outdoor) each semester, odor measurement each semester. Latest monitoring and analysis on 19 August – 14 	<p>Complied</p>

		<p>September 2022 by PT ITEC Solution Indonesia, Analysis report number D.08.1539-1/LHU/2022 dated 14 September 2022 shown that the air quality, Odor and noise are met with the quality standard/threshold PP RI No. 22 Tahun 2021, KepMenLH No. 48 Tahun 1996 and Permenakertrans No. 5 Tahun 2018.</p> <ul style="list-style-type: none"> • Air emission quality monitoring for vehicle, genset and boiler has been conducted on 22 August – 15 September 2022 by PT ITEC Solution Indonesia, Analysis report number D.08.1533-1/LHU/2022 (vehicle) dated 15 September 2022 and D.08.1539-1/LHU/2022 dated 14 September 2022 (genset and boiler), shown that the air emission are met with the quality standard/threshold PerMenLH No. 07 tahun 2007 and PerMenLH No. 13 tahun 2009. • Surface water quality and water biota monitoring to prevent and control the physic and chemist quality of surface water comply to PP RI Nomor 22 tahun 2021. Perfomed by waste water quality monitoring each month, hazardous waste monitoring, land application monitoring, surface water quality monitoring each semester. Surface water quality monitoring and analysis in Sungai Belangkai, Sungai Lalo and Sungai Pamuatan by PT ITEC Solution Indonesia, Analysis report number D.08.1432-1/LHU/2022 dated 13 September 2022 shown that water quality has been met with the standard PP Nomor Nomor 22 tahun 2021. • Flora fauna monitoring performed by wildlife monitoring and monitoring the conservation area (HCV) each month. Monitoring Since for Semester 2 at shown that there were found the presence of wildlife species such as reptile, bird and mammals. 	
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No	Areal Lindung	Kekayaan Jenis		
		Mamalia	Burung	Reptil
1	Anak Sungai Belangkai Purun	1	7	1
2	Anak Sungai Lalo	1	8	1
3	Anak Sungai Pinang	1	9	0
4	Anak Sungai Rotan	2	8	1
5	Sungai Belangkai	2	7	1
6	Sungai Belangkai Purun	-	7	1
7	Sungai Benanai	-	9	1
8	Sungai Benanai Bul	1	10	1
9	Sungai Lalo	1	7	1
10	Sungai Rotan	1	7	1
11	Sungai Salak Sengkilan	1	8	1

- Community perception monitoring performed by community interview, employee data monitoring, interview with village head or public figure regarding their perception to company. Company has monitored the public perception through stakeholder meeting and questioner each year. Questionnaire to public perception regarding the impact of company presence has been disseminated to surrounding community. Latest monitoring of public perception has been performed in 23 – 24 May 2022, questioner of public perception can be demonstrated and well documented. Generally public perception was positive regarding the company presence and contribution to the surrounding community.

The RKL RPL report has been evaluated, reviewed and reported to government agency per semester (six monthly), with the last one (RKL RPL Semester 2 Y2022) reported on 17 February 2023 to all relevant government authority.

Criteria 3.5: A system for managing human resources is in place.

3.5.1	Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the	Procedures related to recruitment, selection, hiring, promotion, retirement and termination (SOP no. AA-HR-305-7-00 dated 1 August 2021) have	Complied
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	<p>workers and their representatives in accordance with the applicable regulation.</p> <p>- Minor compliance -</p>	<p>been implemented consistently by PT RAU, this was confirmed by the management of PT RAU through a Memorandum issued by Group Manager Memorandum No. No. 034/ RAU/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 PT RAU PUK-SPPP-SPSI Workers' Union on behalf of TJ. Purba on May 17 2022. The agenda discussed includes those related to hiring, promotions and employee transfers. Based on interviews with 5 harvest workers at Bungo Tebo Estate and 3 workers at Rigunas Agri Mill, 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, Soudara TJ. Purba that in the explanation/socialization of the procedure on 23 August 2021 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>	
<p>3.5.2</p>	<p>Employment procedures are implemented and records are maintained.</p> <p>- Minor compliance -</p>	<p>The company has consistently implemented the employee recruitment process in accordance with established procedures (SOP no. AA-HR-305-7-00 dated 1 August 20221 – Selection, Acceptance and Appointment of Non-Staff Workers). Documents related to recruitment, promotion and Appointment Decree (in the form of a Memorandum from HRD) can be shown during the audit and are properly maintained.</p> <p>In this audit, verification was carried out on the application of the above procedures several examples of documents that have been verified as follow:</p> <ul style="list-style-type: none"> - Promotion of Bungo Tebo Estate employee’s is carried out in accordance with procedures, namely through an evaluation process of performance and length of working period. Promotion of daily 	<p>Complied</p>

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workers to permanent workers in the 2022 period, a total of 29 workers with the following details:

Realization of Employee Promotion on 2022 Period				
Daily Workers (PHL) to Permanent Workers (SKU) on Bungo Tebo Estate				
No.	Number of Memorandum	Date	Workers Name	Position
1	0259/HR-RO3/MEMO/SK/09/2022	23-Sep-22	Guntur Dinata	Security
2	0258/HR-RO3/MEMO/SK/09/2022	23-Sep-22	Taufik	Security
3	0257/HR-RO3/MEMO/SK/09/2022	23-Sep-22	Ramses E. Simamora	Security
4	0256/HR-RO3/MEMO/SK/09/2022	23-Sep-22	Rahmat E. Batubara	Mandor EF
5	0249/HR-RO3/MEMO/SK/09/2022	23-Sep-22	Rahmad Manulang	Harvester
6	0250/HR-RO3/MEMO/SK/09/2022	23-Sep-22	Arsenus Lase	Harvester
7	0252/HR-RO3/MEMO/SK/09/2022	23-Sep-22	Elmon Risman	Harvester
8	0254/HR-RO3/MEMO/SK/09/2022	23-Sep-22	Syargawi	Harvester
9	0253/HR-RO3/MEMO/SK/09/2022	23-Sep-22	Eko Riadi	Harvester
10	0244/HR-RO3/MEMO/SK/09/2022	23-Sep-22	Hadri	Harvester
11	0245/HR-RO3/MEMO/SK/09/2022	23-Sep-22	Pilipus Gohae	Harvester
12	0246/HR-RO3/MEMO/SK/09/2022	23-Sep-22	Hariri Siregar	Harvester
13	0248/HR-RO3/MEMO/SK/09/2022	23-Sep-22	Herman Harefa	Harvester
14	0231/HR-RO3/MEMO/SK/09/2022	23-Sep-22	Yaiamanozatolu Wau	Harvester
15	0239/HR-RO3/MEMO/SK/09/2022	23-Sep-22	Nur Irawan	Harvester
16	0241/HR-RO3/MEMO/SK/09/2022	23-Sep-22	Sarpani	Harvester
17	0242/HR-RO3/MEMO/SK/09/2022	23-Sep-22	Febrianto	Harvester
18	0243/HR-RO3/MEMO/SK/09/2022	23-Sep-22	Guswandi	Harvester
19	0240/HR-RO3/MEMO/SK/09/2022	23-Sep-22	Heri Mustapa	Harvester
20	0237/HR-RO3/MEMO/SK/09/2022	23-Sep-22	Bangin	Harvester
21	0236/HR-RO3/MEMO/SK/09/2022	23-Sep-22	M. Sudarno	Harvester
22	0235/HR-RO3/MEMO/SK/09/2022	23-Sep-22	Idaman Ismail	Harvester
23	0234/HR-RO3/MEMO/SK/09/2022	23-Sep-22	Buang Zainul	Harvester
24	0237/HR-RO3/MEMO/SK/09/2022	23-Sep-22	Diki Feriyadi	FFB Loader
25	0255/HR-RO3/MEMO/SK/09/2022	23-Sep-22	Sutrisno	FFB Loader
26	0251/HR-RO3/MEMO/SK/09/2022	23-Sep-22	Sumardi Silaban	FFB Loader
27	0232/HR-RO3/MEMO/SK/09/2022	23-Sep-22	Sofyan Tanjung	FFB Loader
28	0233/HR-RO3/MEMO/SK/09/2022	23-Sep-22	Fetra Gibsonta	FFB Loader
29	0238/HR-RO3/MEMO/SK/09/2022	23-Sep-22	Sai'in	FFB Loader

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		<table border="1"> <tr> <td colspan="2">Promotion to Permanent worker on 2022 period:</td> </tr> <tr> <td>Harvesting Foreman</td> <td>1 Worker</td> </tr> <tr> <td>Harvester</td> <td>19 Workers</td> </tr> <tr> <td>Security</td> <td>3 Workers</td> </tr> <tr> <td>FFB Loader</td> <td>6 Workers</td> </tr> <tr> <td>Total</td> <td>29 Workers</td> </tr> </table> <p>- Promotion of 2 daily workers at Bungo Tebo Mill and 10 other daily workers have been proposed to be promoted to permanent workers, as follows:</p> <table border="1"> <tr> <td colspan="5">Realization of Employee Promotion on 2022 Period</td> </tr> <tr> <td colspan="5">Daily Workers (PHL) to Permanent Workers (SKU) on Bungo Tebo Mill</td> </tr> <tr> <th>No.</th> <th>Number of Memorandum</th> <th>Date</th> <th>Workers Name</th> <th>Position</th> </tr> <tr> <td>1</td> <td>0277/HR-RO3/MEMO/SK-PB/09/2022</td> <td>06-Oct-22</td> <td>Longgo Situmeang</td> <td>Kernel Operator</td> </tr> <tr> <td>2</td> <td>0423/HR-RO3/MEMO/SK/09/2022</td> <td>22-Dec-21</td> <td>Antoni Ramanda</td> <td>sorting workers</td> </tr> </table> <p>Proposed promotion of 10 daily worker employees to permanent workers. Proposed by Bungo Tebo Mill Manager to HRD Manager Plt. III through Memorandum No. 152/RAU-PBT/MEMO/11/2022 dated 11 November as much as 10 workers, includes:</p> <ol style="list-style-type: none"> 1. Awaludin position as KCP Operator Helper 2. Ebet Enjer Immanuel position as Tipler Station Operator Helper 3. Joko Sutejo position as Mechanic 4. Iswandi position as Mechanic 5. Samsul position as Mechanic 6. Muslim position as Sortage officer 7. Ahmad Nur Islam position as Tipler Station Operator Helper 8. Deni Firmansyah position as Sortage officer 9. Abdullah position as Cleaning Service 10. James Fernando N. Butar Butar position as Warehouse Officer <p>After the prospective workers are declared to have passed the Administration selection, the Operations Manager (plantations and</p>	Promotion to Permanent worker on 2022 period:		Harvesting Foreman	1 Worker	Harvester	19 Workers	Security	3 Workers	FFB Loader	6 Workers	Total	29 Workers	Realization of Employee Promotion on 2022 Period					Daily Workers (PHL) to Permanent Workers (SKU) on Bungo Tebo Mill					No.	Number of Memorandum	Date	Workers Name	Position	1	0277/HR-RO3/MEMO/SK-PB/09/2022	06-Oct-22	Longgo Situmeang	Kernel Operator	2	0423/HR-RO3/MEMO/SK/09/2022	22-Dec-21	Antoni Ramanda	sorting workers	
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		<p>factories) will propose additional prospective workers to the Regional Head through the Operational HR Manager.</p> <p>The Regional Head and Operational HR Manager verify the submission of prospective workers, giving approval if the submission is in accordance with applicable regulations.</p> <p>In the 2022 period there was not much recruitment of workers, although there was still recruitment at Bungo Tebo Mill. Recruitment process as follows:</p> <p>Recruitment of workers for the position of workshop mechanic on behalf of Dimas Adi Juanda, requirements:</p> <ol style="list-style-type: none"> a. Application letter on behalf of Dimas Adi Juanda dated 19 December 2022 b. Prospective employee data form (Form in Appendix #1) <ul style="list-style-type: none"> - KTP (Resident Identity Card) - KK (Family Card) - Other supporting documents (curriculum vitae, diploma, etc.) - The minimum age of accepted candidates is 18 years - Medical Cehck-up by the PT Rigunas Agri Utama Clinic on 24 February 2023 and declared healthy to carry out the intended work. <p>Based on interviews with 5 harvest workers and 3 workers at the PT RAU Mill during the audit, that during the employee recruitment process, there were no practices that were not in accordance with laws and regulations, for example: withholding personal data/documents, payments for the recruitment process.</p> <p>Scheme smallholder:</p> <p>Spraying activities was done by Spraying Team from the company, manuring done by themselves (smallholder) and harvesting, some of them by themselves and some of them paid workers/harvester to do it (not harvester from the company).</p>	
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		So, in scheme smallholder, the employment procedure not applicable.	
Criteria 3.6: An Occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	<p>(C) All operational activities risks assessed to identify the H&S issues. Mitigation plans and procedures are documented and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>Bungo Tebo POM and Estate</p> <p>PT Rigunas Agri Utama-Bungo Tebo Estate has prepared a procedure for risk assessment. The risk assessment method was calculating exposure x frequency x severity. Bungo Tebo Estate and Bungo Tebo POM have documented in form Hazard Identification Risk Assessment and Control (HIRAC), date of last review is in January 2023. The risk acceptance level has been established for each risk score tier.</p> <p>The risk assessment has covered for all activities in Estate and Mill, such as: land clearing, harvesting, FFB transport, manuring, spraying, weighbridge, grading FFB, sterilizer station, pressing station, engine, room, boiler station, workshop, office activities.</p> <p>The risk analysis and assessment has been performed according to company procedure "Prosedur Hazard Identification Risk Assessment & Document Control AA-SOP-HSE-03" dated 26/09/2018. Mitigation plan to reduce and minimize the risk impact has been develop by company covering:</p> <ul style="list-style-type: none"> • Elimination of risk • Substitution of material and process • Engineering control • Administrative control • Personal protective equipment. <p>Engineering control was implemented to prevent hearing loss, e.g. install noise reduction agent and administrative by put signboard of noise area, as described in Risk. Administrative control was performed by employee mutation/rotation, sanctionfor safety rules violation. Safety inspection was performed regularly to ensurethe compliance of safety regulation.</p> <p>Mitigation plan to reduce the hazard and risk impact also has been</p>	Complied

		<p>developed in OHS Program of PMKS Bungo Tebo & Kebun Bungo Tebo PT Rigunas Agri Utama of 2023, such as:</p> <ul style="list-style-type: none"> - Hazard and Risk identification and Analysis - Safety warning sign installation - Safety inspection and observation - Regular inspection of APAR and Hydrant including emergency equipment - PPE provision - OHS training for workers - Regular monitoring of OHS implementation including safety committee meeting - First aid training - First aid kit provision and monitoring <p>Implementation of the OHS programme can be demonstrated during audit. The OHS programme implementation progress are reported each quarter to Manpower Agency.</p> <p>Monitoring of the safety plan was conducted by regular safety meeting once in a month. Several action plans were raised for the unachieved safety targets and plans.</p> <p>Several Procedure to mitigate the risk and hazard has been develop by company:</p> <ul style="list-style-type: none"> - SOP Identifikasi Bahaya Penilaian Resiko dan Penentuan Pengendalian AA-SMK3-1101.02-R0 dated 1 May 2017 - SOP Investigasi Kecelakaan Kerja AA-SMK3-1101.01-R0 dated 1 May 2017 - SOP Kesiagaan Tanggap Darurat AA-EMS-820-PR dated 5 April 2017 - SOP Pengendalian Kebakaran Lahan AA-KL-14-EFP dated 5 May 	
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		<p>2013, described the mechanism of handling fire.</p> <ul style="list-style-type: none"> - SOP Pengendalian Kebakaran di Pabrik, Kantor, dan Perumahan AA-KL- 15-EFP dated 1 December 2010 - SOP Pengendalian Tumpahan B3 dan Limbah B3 AA-KL-16-EFP dated 1 December 2010 - SOP Pengendalian Tanggap Darurat Boiler AA-KL-17-EFP dated 1 December 2010 - SOP Pengendalian Gempa Bumi, Banjir, dan Tanah Longor AA-KL-18 - EFP dated 1 December 2010 - Accident and emergency procedures no. AA-EMS-446-PR (operation control), AA-EMS-447-PR (Emergency preparedness), AA-EMS-001-FM (Emergency plan), AA-EMS-003-FM (Emergency incident), and AA-EMS- 004-FM (Emergency incident Reporting). - Job safety analysis for working in confined space (e.g. cleaning of storagetank), working at height, welding and other critical area. Work permit system and job safety analysis was established and implemented for these works. <p>Scheme Smallholder:</p> <p>Risk Assessment (HIRAC) for Smallholders cooperative was made by cooperative secretary and assisted by the company. This risk assessment approved by Cooperative Chairman. The content of risk assessment are similar to all smallholders cooperative, where the main activities applied in smallholders blocks being consider within the risk assessment document. In example:</p> <p>Activities coverage on HIRAC for Smallholders are FFB loading at blocks and unloading FFB's at Mill; Applying Fertilizer at blocks; Applying herbicides (by spraying team); Harvesting and Pest Control (particularly Elephant disruption).</p>	
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3.6.2	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.</p> <ul style="list-style-type: none"> - Critical (Major) compliance - 	<p>The effectiveness of the OHS program to address health and safety risks have been monitored in the form of:</p> <ul style="list-style-type: none"> - Monthly OHS Committee meeting, to discuss and address current OHS issues, included scheme smallholder - Documentation of accident record and the calculation of LTA. - Annual review of HIRAC. - Trimester OHS Report, that has been submitted regularly to Labor Agency. The report period of October – December 2022 has been submitted dated 06 January 2023. 	Complied
Criteria 3.7: All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.			
3.7.1	<p>(C) A documented programme that provides training is in place, which is accessible to all staff, workers, scheme smallholders, and outgrowers taking into account gender- specific needs, and which covers applicable aspects of P&C Principles, in a form they understand and includes assessment of the training.</p> <ul style="list-style-type: none"> - Critical (Major) compliance - 	<p>Bungo Tebo POM and Estate:</p> <p>PT Rigunas Agri Utama has demonstrated the records of training program related to P&C RSPO under “Program Pelatihan Environmental and Sustainability” in 2022 and 2023, that prepared by Training Center Asian Agri –based on competence mapping.</p> <p>The program is accessible to all staff, workers, scheme smallholders taking into account gender- specific needs.</p> <p>Training program comprise of:</p> <ul style="list-style-type: none"> - Sustainability Awareness (RSPO P&C, ISCC, ISPO) - HCV trainin - Basic Safety – K3 training - Basic Fire training - First aider/“Pertolongan Pertama Gawat Darurat” - Handling of hazardous waste and chemical material - Safety Use Herbicide and Chemical - Manuring training - Pest and disease handling training 	Complied

		<ul style="list-style-type: none"> - Water operator training - Boiler operator refreshment training - Traceability and mass balance training <p>Scheme Smallholder: Koperasi Tanjung Dani Sakti, Koperasi Sumber Usaha, Koperasi Sawit Bina Tani, Koperasi Sawit Sumay Makmur, and Koperasi Barokah have had annual training program 2022 and 2023, comprise of:</p> <ul style="list-style-type: none"> - Cooperative policy training - Pricing Mechanism socialization - OHS training and first aid - Harvesting training - Weeds control training - HCV training - Soil and water conservation - Basic fire training - Integrated pest management training 	
3.7.2	<p>Records of training are maintained, where appropriate on an individual basis.</p> <ul style="list-style-type: none"> - Minor compliance - 	<p>Bungo Tebo POM & Estate: Record of training implementation are well maintained, in the form of attendance list, minutes of training and photograph. Below are some training implementations of 2022:</p> <ul style="list-style-type: none"> - Pest and disease handling training, dated 10 September 2022. - Safety use Herbicides and Chemical refreshment training on 28 December 2022. - Training of manuring on 14 February 2023. - Training of firefighting on 11 March 2023. - Training of sustainability awareness on 14 September 2022. 	Complied

		<p>Scheme Smallholder: The trainings for smallholder were conducted collectively for smallholder’s cooperative. Some trainings held in 2022 among others:</p> <ul style="list-style-type: none"> - RSPO certification training on 23 May 2022. - OHS & PPE training on 27 April 2022. - HCV training on 27 April 2022. - First aid training on 23 May 2022. - Manuring training on 24 August 2022. - Spraying training on 24 August 2022. - IPM training on 24 August 2022. 	
3.7.3	<p>Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.</p> <p>- Minor compliance -</p>	<p>Training program for traceability and supply chains programmed each year. Latest training has been carried out on 1 August 2022. The training provided by Mr. Welly Joel. Training attended by Sofian B. S (KTU/Administration Assistant), Rico Santoso P (Sustainability Officer), Leo Butar – Butar (Mill Manager), Lusi Berdiana (Weighbridge clerk), Yuyun (Weighbridge Clerk), Tiama Zalukhu (Production clerk), Syariai Siregar.</p>	Complied
<p>Criteria 3.8: Supply chain requirements for mills. Procedure note: all requirements are classified as Critical Indicators. However it will not contribute to suspension if there is more than 5 non-compliance within a principle)</p>			
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</p>	<p>The certificate holder uses Mass Balance as the RSPO Supply Chain Module. This indicator is not applicable.</p>	Not Applicable

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	<p>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>		
3.8.2	<p>Mass Balance Module A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	<p>The certificate holder is a palm oil mill that uses RSPO supply chain model Mass Balance, therefore they can process FFB from certified and non-certified sources. The site aware that they can only claim their product (CPO and PK) as Mass Balance. PT Rigunas Agri Utama – Bungo Tebo Palm Oil Mill only claim the certified volume of oil palm products produced from processing of the certified FFB.</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 represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p>	<p>The estimated annual tonnage for certified FFB processed, CPO and PK production are available in the Estate and Mill annual production budget for 12 months since last recertification assessment. The FFB tonnage received from company-owned estates (Bungo Tebo Estate), scheme smallholders (Bungo Tebo Plasma) and third party supplier (PD Asan Jaya, SDR, SDR AS, HAZRI).</p> <p>The estimated for CPO and PK production from Bungo Tebo POM is recorded under the public summary report, certificate and RSPO IT Platform. The actual CPO and PK production were verified during each subsequent annual surveillance assessment visit to ensure that certified mill only deliver the allowed tonnage for the year.</p> <p>BSI Group as certification body has submitted estimated of FFB received, CPO and PK produced to RSPO Public Summary Report and the RSPO PalmTrace system.</p> <p>Below are the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year 2022/2023: <u>Forecast volume in Palm Trace (licence period 13/05/2022 – 12/05/2023):</u> FFB : 112,877 MT CPO : 23,935 MT (OER: 21.21%)</p>	Complied

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		<p>PK : 6,208 (KER: 5.50%)</p> <p><u>Actual production volume (May 2022 – ytd Jan 2023)</u></p> <p>FFB: 113,201.86 MT</p> <p>CPO: 25,087.17 MT</p> <p>PK: 6,178.11 MT</p> <p><u>Actual sold volume as RSPO certified (May 2022 – ytd Jan 2023)</u></p> <p>CPO: 22,640.81</p> <p>PK: 5,524.43 MT</p>	
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	PT. Rigunas Agri Utama – Bungo Tebo Palm Oil Mill has been registered in RSPO IT Platform with registered ID number RSPO_PO1000002913. Bungo Tebo Palm Oil Mill has meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	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> <ul style="list-style-type: none"> a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill’s procedures for the implementation of this standard. 	<p>During this surveillance assessment, there is no changing on procedure related to supply chain. PT Rigunas Agri Utama - Bungo Tebo POM can demonstrates procedures:</p> <ul style="list-style-type: none"> a. Standard Operating Procedures – Traceability (AA-MPM-OP-1400.17.R7) dated 1 October 2019. The procedures cover traceability of CPO and PK, since FFB receiving from Bungo Tebo Estate and Bungo Tebo Plasma, processing up to shipping of CPO and PK as well as daily production report. The procedure also regulates the internal audit by Sustainability Internal Audit Manager. Traceability records are to be kept for 10 years. b. Standard Operating Procedure – Book Keeping (AA-MPM-OP-1400.18-R4). The procedure explains method to check only certified product received. The book keeping mass balance stated every 3 months: January-March, April-June, July-September, and October-December each year. Head of Environment and Sustainability will inform to Certification Body in the case of projected overproduction. 	Complied

	<p>d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill.</p>	<p>c. Standard Operating Procedure – System RSPO PalmTrace (AA-SM-405- .2-R3) dated 1 January 2018. Described method to check certificate validity and how to make the Shipping Announcement, Confirmation, Trace and Remove in PalmTrace.</p> <p>d. SOP of Palm Oil Mill operation:</p> <ul style="list-style-type: none"> - SOP AA-MPM-OP-1400.02.R2, dated 1 September 2011, Stasiun Penerimaan (FFB Receiving Station) - SOP AA-MPM-OP-1400.03.R1, dated 1 February 2009, Stasiun Rebusan (Sterilizer) - SOP AA-MPM-OP-1400.04.R1, dated 1 February 2009, Stasiun Pemisahan Berondolan (Loose Fruit Separation) - SOP AA-MPM-OP-1400.05-R1, dated 1 February 2009, Stasiun Pengadukan dan Pengempaan (Pressing Station) - SOP AA-MPM-OP-1400.06-R1, dated 1 February 2009, Stasiun Pemurnian (Clarification) - SOP AA-MPM-OP-1400.07-R1, dated 1 February 2009, Stasiun Pemisahan Nut dan Fiber (Nut and Fiber separation) - SOP AA-MPM-OP-1400.08-R1, dated 1 February 2009, Stasiun Kernel (Kernel Station) - SOP AA-MPM-OP-1400.09-R1, dated 1 February 2009, Stasiun Boiler - SOP AA-MPM-OP-1400.10-R1, dated 1 February 2009, Stasiun Engine Room - SOP AA-MPM-OP-1400.11-R1, dated 1 February 2009, Stasiun Water Treatment - SOP AA-MPM-OP-1400.12-R1, dated 1 February 2009, Laboratorium - SOP AA-MPM-OP-1400.13-R1, dated 1 February 2009, Stasiun Pengelolaan Limbah (Palm Oil Mill Effluent Treatment) 	
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		<ul style="list-style-type: none"> - SOP AA-MPM-OP-1400.14-R2, dated 1 September 2011, Stasiun Penimbunan dan Pengiriman CPO dan Kernel (CPO and PK Storage and Despatch) - SOP AA-MPM-OP-1400.15-R1, dated 1 February 2009, Perawatan (Preventive Maintenance and Repair). <p>PT Rigunas Agri Utama – Bungo Tebo POM is able to demonstrate complete and up-to-date records and report demonstrating compliance with the supply chain’s general requirement and modular requirement, including training records. Sample seen: Mass balance report October – December 2021, January – December 2022, Production record (certified and non-certified FFB, CPO, PK), transaction record in PalmTrace, FFB receiving record, CPO and PK delivery record.</p> <p>As per Procedure of Traceability (AA-MPM-OP-1400.17-R7), the responsible person in charge to the supply chain system is Mill/ Factory Manager and General Manager. During audit, the Mill Manager was able to demonstrate sufficient knowledge and understanding on RSPO supply chain implementation for Palm Oil Mill.</p> <p>Audit team sighted management letter “Memorandum Group Manager PT. Rigunas Agri Utama No.023/RAU/PBT/MEMO/10/21, Hal Penunjukan Saudara Sangal Leonard Butar Butar” dated 14 October 2021. The letter appointed mill manager as person in charge for operational and implementation of sustainability standard, including audit process.</p> <p>Bungo Tebo POM has SOP AA-MPM-OP-1400.02.R2, Stasiun Penerimaan (FFB Receiving Station) that described procedures for receiving and processing certified and non-certified FFB.</p>	
3.8.6	<p>Internal Audit</p> <p>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill;</p>	<p>As per Procedure of Traceability (AA-MPM-OP-1400.17-R7) chapter 6.7, Sustainability Internal Audit Manager conducted internal audit to ensure all operational and documentation activities are comply to the requirement in RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. Company also has a procedure internal audit AA-SOP-ES-6001-R5, dated 1 August 2020; according to</p>	Complied

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	<p>a) Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>b) Effectively implements and maintains the standard requirements within its organisation.</p> <p>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p>	<p>procedure chapter 4.0, internal audit conducted minimum once a year considering the critical area.</p> <p>The site has conducted annual RSPO internal audit on 1 – 6 August 2022 using RSPO P&C Indonesia NI 2020 that contain RSPO Supply Chain Certification Standard by Internal Auditor Hendry K Simajuntak (lead Auditor), Ian Septian Arifin, Wahyu Mulya Atmaja. Status of corrective actions have been discussed in management review meeting. The latest RSPO Management Review conducted by PT Rigunas Agri Utama – Bungo Tebo POM on 22 August 2022. Based on minutes of management review, the meeting has discussed:</p> <ul style="list-style-type: none"> - Results of internal audits; there were 3 non-conformity found during internal audit, Corrective action plan has been proposed and target closed on 30 October 2022. - Customer feedback; damaged road conditions which resulted in delays in the transportation of CPO. Company follow up by road maintenance regularly. - Process performance and product conformity; no issue related to process performance. - Status of preventive and corrective actions; there is action plan that need to be follow up regarding high FFA in storage tank. - Follow-up actions from management reviews; no issue - Changes that could affect the management system; there has been no change that could affect the management system. - Improvement Recommendations; Installing digital ammeters to monitor press machine pressure to enhance the OER. <p>Record of internal audit and management review are well maintained and kept in the office by sustainability officer.</p>	
3.8.7	Purchasing and Goods In	Bungo Tebo POM received FFB from certified and non-certified source. Certified source consists of company own estate (Bungo Tebo Estate) and Scheme Smallholder (Bungo Tebo Plasma). Non-certified FFB sourced	Complied

	<p>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBS received.</p> <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>from third party supplier 2023 consist of individual farmers and/or FFB collectors, e.g.: PD Asan Jaya, SDR, SDR AS, HAZRI.</p> <p>Document "Surat Pengantar TBS" (FFB Delivery Note) and Kartu Timbangan (Weighbridge Card) described identity and location of FFB source and other item required e.g.</p> <p>Certified FFB received:</p> <ul style="list-style-type: none"> - Surat Pengantar TBS No. D00217; dated 22/02/2023; FFB from KT 8 Adil Makmur, KUD Sawit Sumay Makmur, planting year 1994/1995; FFB origin: Plots 183, 192, 193; Field weight: 7,000 kg; vehicle number BH 9578V; Driver: Boleng. - Weighbridge Ticket No. PBTA223102038 dated 22/02/2022, commodity: FFB Certified; source: Kebun Plasma – KT 08 Adil Makmur; amount: 335 bunch; Netto: 6,494 kg; RSPO Cert: RSPO 620917; transporter: Plasma; vehicle number: BH9578V; driver: Boleng; batch number: 13-100-03434122-41016145. - Weighbridge Ticket No. PBTA12320123 dated 24/02/2022, commodity: FFB Certified; source: Kebun Bungo Tebo Afdeling -2, Block B19a & B19b; amount: 919 bunch; Netto: 3,970 kg; RSPO Cert: RSPO 620917; transporter: Internal; vehicle number: BH7547XX; driver: Pendrizal; batch number: 13-100-07139122-41016741. - Weighbridge Ticket No. PBTA12320129 dated 24/02/2022, commodity: FFB Certified; source: Kebun Bungo Tebo Afdeling -1, Block D08G; amount: 214 bunch; Netto: 4,610 kg; RSPO Cert: RSPO 620917; transporter: Internal; vehicle number: BH3022XX; driver: Erwin; batch number: 13-100-07139122-41016699. <p>Non Certified FFB received:</p> <ul style="list-style-type: none"> - Surat Pengantar TBS No. 057; dated 20/02/2023; FFB from SDR, Dusun Tuo, planting year 2002; To : PT RAU; Amount 247 bunches; vehicle number BH8887MD; Driver: Hambali. 	
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		<ul style="list-style-type: none"> - Weighbridge Ticket No. PBTA523102953 dated 20 Februari 2023, commodity: third party FFB; source: FFB supplier SDR (ID A269); Nett weight: 5,414 kg; transporter: Pengangkutan TBS Luar; vehicle number: BH 8887 MD, driver: Hambali. - Surat Pengantar TBS No. 10790; dated 20/02/2023; FFB from HAZRI, Dusun Tuo Sumay, planting year 2005; To : PT RAU; Amount 303 bunches; vehicle number BH8020UY; Driver: Sriun. - Weighbridge Ticket No. PBTA523102946 dated 20 Februari 2023, commodity: third party FFB; source: FFB supplier HAZRI (ID A324); Nett weight: 6,386 kg; transporter: Pengangkutan TBS Luar; vehicle number: BH 8020 UY, driver: Sriun. - Surat Pengantar TBS No. 12780; dated 20/02/2023; FFB from SDR (AS), Dusun Tebo, planting year 2005; To : PT RAU; Amount 401 bunches; vehicle number BH8399WM; Driver: Iyan. - Weighbridge Ticket No. PBTA523102983 dated 20 Februari 2023, commodity: third party FFB; source: FFB supplier SDR - AS (ID A345); Nett weight: 8,228 kg; transporter: Pengangkutan TBS Luar; vehicle number: BH8399WM, driver: Iyan. <p>Laporan Harian Produksi (Daily Production Report) is document that mentioned and verified the tonnage of certified and non-certified FFB received. E.g. Daily Production Report dated 31 January 2023, mention that:</p> <ul style="list-style-type: none"> - Certified FFB received that day is 807,406 kg (consist 399,824 kg from Bungo Tebo Estate and 407,582 kg from Bungo Tebo Plasma); non-certified FFB received is 407,582 kg. For period January 2023, certified FFB received is 10,925,965 kg (3,745,649 kg from Bungo Tebo Estate and 7,060,949 kg from Bungo Tebo Plasma); non-certified FFB received is 11,197,684 kg. <p>Sustainability Department/Corporate relation officer will inform to Certification Body in the case of projected overproduction.</p>	
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		<p>In the case on non-conforming raw material entering the process, Bungo Tebo POM has the mechanism to handle non-conforming material and/or document according to Procedure of Traceability (AA-MPM-OP-1400.17-R7). Non-conforming material will be downgraded to non-certified material/product.</p>	
<p>3.8.8</p>	<p>Sales and Goods Out The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ul style="list-style-type: none"> a) The name and address of the buyer; b) The name and address of the seller; c) The loading or shipment / delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation; i) A unique identification number. 	<p>PT. Rigunas Agri Utama - Bungo Tebo POM demonstrated SOP of Traceability (AA-MPM-OP-1400.7.R7). Chapter 6.2 indicates the Marketing Manager issued Delivery Order (DO) that contain information: Name and address of production unit; name and address of buyer; contract number, type of product transportation (air, land, sea); type of product CPO/PK certified or non-certified; quantity of product sold, CPO/PK certified or non-certified in MT; date of shipping; product quality specification CPKO (FFA, water content, dirt content) and Supply chain model (Mass Balance). At Bungo Tebo POM, weighbridge operator printed out CPO weighbridge ticket, based on DO from marketing indicates: Type of commodity; CPO certified or not-certified; country of origin: Indonesia; Supply Chain model: (Mass Balance); Certificate number of the POM; date of delivery, Product quality specification (moisture, FFA, dirt); Contract number/DO number; Quantity, Transport detail (driver name, vehicle number); Buyer address.</p> <p>Below are sample of sales document of RSPO certified CPO:</p> <ul style="list-style-type: none"> - Sales contract Number 06011/CC41/02/22 dated 17 June 2022; Seller: PT Rigunas Agri Utama, Address: Jl. Palembang Kav 35 – 37 Kebon Melati Tanah Abang Kota Adm. Jakarta Pusat DKI Jakarta 10230; Buyer: PT Padang Raya Cakrawala, Address: Jl. Palembang Kav 35 – 37 RT 004 RW 001 Kebon Melati Tanah Abang Jakarta Pusat DKI Jakarta; Delivery date: June 2022 (soon); Document contract issued: 17 June 2022; RSPO certificate number RSPO 620917; Description product: CPO RSPO; Supply chain models: Mass Balance; Quantity product: 1,000,000 kg; Loading port: Bungo Tebo Palm Oil Mill; Unloading port: Jl. Tanjung 	<p>Complied</p>

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		<p>Priok Gateh Nan XX Lubuk Begalung, Kota Padang Sumatera Barat; Unique identification number: 06011/CC41/02/22.</p> <ul style="list-style-type: none"> - Sales contract Number 11012/CC41/02/22 dated 18 November 2022; Seller: PT Rigunas Agri Utama, Address: Jl. Palembang Kav 35 – 37 Kebon Melati Tanah Abang Kota Adm. Jakarta Pusat DKI Jakarta 10230; Buyer: PT Sari Dumai Sejati, Address: Jl. Palembang Kav 35 – 37 Kebon Melati Tanah Abang Jakarta Pusat DKI Jakarta; Delivery date: November 2022 (soon); Document contract issued: 18 November 2022; RSPO certificate number RSPO 620917; Description product: CPO RSPO; Supply chain models: Mass Balance; Quantity product: 500,000 kg; Loading port: Bungo Tebo Palm Oil Mill; Unloading port: Jl. Raya Pelabuhan talang Duku RT.010 RW.000, Talang Duku Taman Rajo- Kab. Muaro Jambi, Jambi; Unique identification number: 110121/CC41/02/22. - Sales contract Number 05022/CC41/02/22 dated 27 May 2022; Seller: PT Rigunas Agri Utama, Address: Jl. Palembang Kav 35 – 37 Kebon Melati Tanah Abang Kota Adm. Jakarta Pusat DKI Jakarta 10230; Buyer: PT Padang Raya Cakrawala, Address: Jl. Palembang Kav 35 – 37 RT 004 RW 001 Kebon Melati Tanah Abang Jakarta Pusat DKI Jakarta; Delivery date: June 2022 (soon); Document contract issued: 27 May 2022; RSPO certificate number RSPO 620917; Description product: CPO RSPO; Supply chain models: Mass Balance; Quantity product: 750,000 kg; Loading port: Bungo Tebo Palm Oil Mill; Unloading port: Jl. Tanjung Priok Gateh Nan XX Lubuk Begalung, Kota Padang Sumatera Barat; Unique identification number: 05022/CC41/02/22. <p>Minimum information have been available in the sales or delivery documents as above.</p> <p>Information are complete and presented in couple document, e.g. Sales Contract, Delivery Order and Weighbridge Card. Report of CPO and PK deliveries are documented in Daily Production Report and Monthly Production report.</p>	
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		<p>For PK certified RSPO was use internally by PT Rigunas Agri Utama/deliver to Bungo Tebo Kernel Crushing Plant (same company and located in the same location with Bungo Tebo Palm Oil Mill). Delivery of PK certified is recorded in Delivery Form. Sample seen for delivery form of PK certified:</p> <ul style="list-style-type: none"> - Delivery form Number KCP PBT 4107 SS, dated 31 July 2022; Seller is PT Rigunas Agri Utama – Bungo Tebo Palm Oil Mill, Address: Desa Tuo Sumay, Kecamatan Sumay, Kabupaten Tebo, Jambi; Buyer: PT Rigunas Agri Utama – Bungo Tebo KCP, Address: Desa Tuo Sumay, Kecamatan Sumay, Kabupaten Tebo, Jambi; Comodity: CSPK RSPO; Supply Chain Module: Mass Balance; Certificate number: RSPO 620917; Quantity: 847,620 kg; Deliver by fan conveyor. - Delivery form Number KCP PBT 4107 SS, dated 31 August 2022; Seller is PT Rigunas Agri Utama – Bungo Tebo Palm Oil Mill, Address: Desa Tuo Sumay, Kecamatan Sumay, Kabupaten Tebo, Jambi; Buyer: PT Rigunas Agri Utama – Bungo Tebo KCP, Address: Desa Tuo Sumay, Kecamatan Sumay, Kabupaten Tebo, Jambi; Comodity: CSPK RSPO; Supply Chain Module: Mass Balance; Certificate number: RSPO 620917; Quantity: 708,100 kg; Deliver by fan conveyor. <p>PT. Rigunas Agri Utama – Bungo Tebo POM has made Shipping Announcement in RSPO IT Platform for sales of RSPO certified CPO and PK per group of shipments (DO).</p>	
<p>3.8.9</p>	<p>Outsourcing Activities</p> <p>i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification.</p> <p>ii) The mill shall ensure the following:</p>	<p>PT. Rigunas Agri Utama – Bungo Tebo POM does not outsources its milling activities.</p> <p>The Mill outsourced transport activity to independent third party and ensure that the third party complies with the RSPO Supply Chain Certification requirements.</p> <p>During transportation, PT. Rigunas Agri Utama – Bungo Tebo POM legally owned the CPO.</p> <p>PT Rigunas Agri Utama – Bungo Tebo POM has an agreement contract with transporter as below:</p>	<p>Complied</p>

	<p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</p>	<p>- PT Trans Jaya Pertama, titled "Perjanjian Pengangkutan No.04/XII/TJP-RAU/2020 dated 1 December 2020; Contract agreement are signed and enforceable by both parties. According to contract agreement article 7 point 1.m stated that "Transporter bersedia memenuhi persyaratan system sertifikasi rantai pasok saat pengangkutan bahan baku dan bersedia untuk diaudit oleh auditor internal perusahaan dan auditor pihak eksternal dari badan sertifikasi yang ditunjuk oleh pihak kedua jika diperlukan" – Transporter are willing to comply with certification system of RSPO Supply Chain during transport material and willing to be audit by internal auditor company and external auditor from Certification Body if necessary.</p> <p>A documented control system for the outsourced process is described in SOP Traceability (AA-MPM-OP-1400.17-R7). The procedure has been communicated to outsourced transporter.</p> <p>Internal control for CPO and PK delivery by contractor also has made by Bungo Tebo Palm Oil Mill before transport and during transport with:</p> <ul style="list-style-type: none"> ✓ Surat Izin Muat CPO dan Kernel, contain information of Driver name, Identity number, Car/Truck Number, CPO/PK Dispatch time, netto, incoming and outgoing time. ✓ Delivery Order Slip from Transporter, contain information of sales contract number, Truck number, destination, driver name, port destination. ✓ Daftar Periksa Kesiapan Pengiriman CPO/Kernel contain information of Truck number, driver name, date of inspection, item inspection including: driver identity and completeness of vehicle legality, completeness of physical standard of vehicle, number of seal. <p>During audit can be demonstrated that internal control has been implemented accordingly.</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.	PT. Rigunas Agri Utama – Bungo Tebo POM has record the name and contact detail of all contractors as follow:	Complied

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		PT Trans Jaya Pertama; Jl. Timor No 10, Medan 20235 and Jl. Jend. Sudirman, Dusun VI, Kelurahan Sidomulyo, Kecamatan Pulo Bandring, Kisaran, Sumatera Utara Province; contact Mr. Anwar, Mrs. Lie Kiem.	
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.	PT. Rigunas Agri Utama – Bungo Tebo POM through Stakeholder Relation Officer – Jakarta Office aware to inform CB regarding the name and contact detail if there is new contractor. However, no new contractor used for the physical handling of RSPO certified oil palm products used for the physical handling of RSPO certified oil palm products. PT Trans Jaya Pertama previously has name CV Jaya Pertama; this is the same transporter.	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>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>Bungo Tebo POM can demonstrate complete, up-to-date and accessible records and reports covering all aspects of RSPO Supply Chain Certification Standard requirements. Records and report verified are as follows:</p> <ul style="list-style-type: none"> - Laporan Harian Produksi (Daily Production Report) dated 31 January 2023, 31 December 2022. - Monthly Production Report 2022 and 2023. - Kartu Timbangan (Weighbridge Card) PK. - Kartu Timbangan (Weighbridge Card) CPKO. - Delivery Order. - Sales Contract. <p>The procedure of Traceability (AA-MPM-OP-1400.7.R7), section C. 5.8 requires that all records and reports related to traceability and book keeping are retained for a period of 10 years. The site can demonstrate availability of records and reports during audit.</p> <p>Bungo Tebo POM recorded and balanced all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis. All volumes of certified CPO and PK delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. Bungo</p>	Complied

	<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>Tebo POM only deliver Mass Balance sales from a positive stock, the mill does not practiced sell short.</p>	
3.8.13	<p>Extraction Rate The oil extraction rate (OER) and the kernel extraction rate(KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	<p>Oil Extraction Rate (OER) and Kernel Extraction Rate (KER) are applied to provide reliable estimation of CPO and PK produced. The organization is able to provided estimate volume of CPO and PK in a year period as in Budget FY2022/2023 Production FFB, CPO and PK. The organization also keep an up to date record of the FFB volume received, CPO and PK produced over a period of twelve (12) month, as in Rekapitulasi Produksi TBS, CPO dan PK PT Rigunas Agri Utama – Bungo tebo POM. OER and KER are estimated based on associated inputs and upon past experience (previous year FFB, CPO and PK production). For year 2022, the budget for conversion from FFB into CPO (OER) is 20.6%, whilst budget for conversion from FFB into PK (KER) is 5.50%. The site has set OER for budget 2023 (Jan - Dec) as 19.73% and KER as 5.50%.</p>	Complied
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	<p>The actual conversion ratio is monitored on daily basis through sounding result and documented in daily report. PT. Rigunas Agri Utama – Bungo Tebo POM is able to demonstrate the work instruction for analysis of oil content. Sample seen on document of “Laporan Harian Produksi”. Based on Laporan Harian Produksi dated 31 January 2023, the sounding result and production report shows that actual conversion ratios from FFB into CPO are: OER average today is 19.25%, OER average todate is 19.73% And actual conversion ratios from FFB into PK are: KER average today is 5.15% and KER average todate is 5.25%.</p>	Complied

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<p>3.8.15</p>	<p>Processing For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	<p>Bungo Tebo POM uses Mass Balance model for implementation of the RSPO Supply Chain. This indicator is not applicable.</p>	<p>Complied</p>																																																																								
<p>3.8.16</p>	<p>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.</p>	<p>Bungo Tebo POM has done Shipping Announcement in RSPO IT Platform, for examples:</p> <table border="1" data-bbox="1093 587 1960 1236"> <thead> <tr> <th>Transaction ID</th> <th>Buyer</th> <th>Product</th> <th>Supply Chain Model</th> <th>Volume</th> <th>Shipping date</th> </tr> </thead> <tbody> <tr> <td>TR-63be4eba-d169</td> <td>PT SDS</td> <td>CSPO</td> <td>MB</td> <td>6.99</td> <td>19-12-2022</td> </tr> <tr> <td>TR-100c7b65-9f6d</td> <td>PT SDS</td> <td>CSPO</td> <td>MB</td> <td>564.29</td> <td>27-11-2022</td> </tr> <tr> <td>TR-537a891e-a606</td> <td>Bungo Tebo KCP</td> <td>CSPK</td> <td>MB</td> <td>2454.05</td> <td>30-09-2022</td> </tr> <tr> <td>TR-ebbac6cc-fa77</td> <td>PT SDS</td> <td>CSPO</td> <td>MB</td> <td>105.83</td> <td>30-08-2022</td> </tr> <tr> <td>TR-710d3e44-5690</td> <td>PT SDS</td> <td>CSPO</td> <td>MB</td> <td>159.62</td> <td>11-08-2022</td> </tr> <tr> <td>TR-dce00bff-cbcf</td> <td>Bungo Tebo KCP</td> <td>CSPK</td> <td>MB</td> <td>847.22</td> <td>30-06-2022</td> </tr> <tr> <td>TR-7dfea23c-77bd</td> <td>PT PRC</td> <td>CSPO</td> <td>MB</td> <td>210.53</td> <td>13-05-2022</td> </tr> <tr> <td>TR-db444450-bd35</td> <td>PT SDS</td> <td>CSPO</td> <td>MB</td> <td>500</td> <td>05-07-2022</td> </tr> <tr> <td>TR-9d086390-27cf</td> <td>PT SDS</td> <td>CSPO</td> <td>MB</td> <td>59.72</td> <td>10-06-2022</td> </tr> <tr> <td>TR-7421af75-2aae</td> <td>PT PRC</td> <td>CSPO</td> <td>MB</td> <td>4210.53</td> <td>13-05-2022</td> </tr> <tr> <td>TR-95d30f13-8314</td> <td>Bungo Tebo KCP</td> <td>CSPK</td> <td>MB</td> <td>1540.84</td> <td>13-05-2022</td> </tr> </tbody> </table> <p>There are CPO certified sold as ISCC certified with volume 804,610 kg on December 2022. PT Rigunas Agri Utama – Bungo Tebo POM has remove in the RSPO Palm trace for the volume sold as ISCC.</p>	Transaction ID	Buyer	Product	Supply Chain Model	Volume	Shipping date	TR-63be4eba-d169	PT SDS	CSPO	MB	6.99	19-12-2022	TR-100c7b65-9f6d	PT SDS	CSPO	MB	564.29	27-11-2022	TR-537a891e-a606	Bungo Tebo KCP	CSPK	MB	2454.05	30-09-2022	TR-ebbac6cc-fa77	PT SDS	CSPO	MB	105.83	30-08-2022	TR-710d3e44-5690	PT SDS	CSPO	MB	159.62	11-08-2022	TR-dce00bff-cbcf	Bungo Tebo KCP	CSPK	MB	847.22	30-06-2022	TR-7dfea23c-77bd	PT PRC	CSPO	MB	210.53	13-05-2022	TR-db444450-bd35	PT SDS	CSPO	MB	500	05-07-2022	TR-9d086390-27cf	PT SDS	CSPO	MB	59.72	10-06-2022	TR-7421af75-2aae	PT PRC	CSPO	MB	4210.53	13-05-2022	TR-95d30f13-8314	Bungo Tebo KCP	CSPK	MB	1540.84	13-05-2022	<p>Complied</p>
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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 Standard Operating Procedures – Traceability (AA-MPM-OP-1400.17.R7) dated 1 October 2019. PT Rigunas Agri Utama – Bungo Tebo POM delivered RSPO certified CPO and PK in bulk, the Mill has made no claim regarding the use of or support of RSPO certified oil palm products. Description of RSPO certified product only made in shipping documentation, e.g. Sales Contract, Delivery Order and Weighbridge Card.</p>	Complied
General corporate communications			
4.1	<p>A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.</p>	<p>PT. Rigunas Agri Utama – Bungo Tebo POM is a subsidiary of RSPO registered member PT. Inti Indosawit Subur. The corporate communication of PT Inti Indosawit Subur can be seen in the company website, under brand Asian Agri at the address www.asianagri.com</p>	Complied
4.2	<p>In corporate communications a member is allowed to:</p> <ul style="list-style-type: none"> • Display its RSPO membership status • Display the RSPO web address (www.rspo.org) • State that the member supports the work of the RSPO • State the member's history with regard to the RSPO. • Use the RSPO trademark to promote its membership of the RSPO. <p>Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at www.rspo.org' where the link must lead to the member's profile page.</p>	<p>Corporate communication in Asian Agri website, can be seen on https://www.asianagri.com/id/panel-keberlanjutan/standar-sertifikasi</p> <ul style="list-style-type: none"> a. Display its RSPO membership status: In the website of Asian Agri, it was stated the company is RSPO Member since February 2006. b. Display the RSPO web address: Not in direct manner. In Asian Agri website, company made a link to RSPO website. c. 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." d. State the member's history with regards to the RSPO: Complied. In the website of Asian Agri, it was stated the company is RSPO Member since February 2006. 	Complied

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		Use of RSPO Trademark to promote its membership of the RSPO: in the website, the company does not display RSPO Trademarks and corporate logo.	
4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Asian Agri did not display its RSPO membership status. It is clear that the statement did not lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Complied
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member’s own products.	Asian Agri did not display its RSPO membership status. It is clear that the statement are clear and did not mislead consumers or other stakeholders as to the certified content of oil palm products in the Asian Agri own products.	Complied
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	Asian Agri did not display its RSPO Corporate Logo in any document.	Complied
Business to business communications			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	There was no use of RSPO trademark and/or RSPO corporate logo in business to business communication related to RSPO certified product; between PT. Rigunas Agri Utama and their buyers. PT. Rigunas Agri Utama – Bungo Tebo POM stated in sales documents, e.g. Sales Contract, Delivery Order and Weighbridge Card that the product they sold/deliver is RSPO Certified CPO or PK model Mass Balance.	Complied
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	It was verified that when selling certified oil palm product, PT. Rigunas Agri Utama – Bungo Tebo POM stated the supply chain model and certificate number, e.g. in Sales Contract, Delivery Order and Weighbridge Card.	Complied
5.3	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:	PT. Rigunas Agri Utama – Bungo Tebo POM is not a distributor or wholesaler. Not applicable.	Not Applicable

	<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>		
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. Rigunas Agri Utama – Bungo Tebo POM is producing CPO and PK. The communication provided in the delivery documents has provided clear description of the products.</p> <p>There is no product labelling.</p>	Complied
MODULE B – MASS BALANCE SPECIFIC RULES			
Minimum Mass Balance content			
	95% or above of the oil palm content must be RSPO MB-certified.	The MB volume that can be sold is only the certified CPO or PK produced from certified FFB. Hence the CSPO volume sold under MB model is considered 100% content.	Complied
	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.	The MB volume that can be sold is only the certified CPO or PK produced from certified FFB. Hence the CSPO volume sold under MB model is considered 100% content.	Complied

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 provided in the RSPO Trademark License Terms and Conditions and in Annex 1 of the Rules on Market Communications & Claims document. 	<p>There is no labelling and trademarking used by PT. Rigunas Agri Utama - Bungo Tebo POM on their products.</p>	<p>Complied</p>
Messaging (MB)			
	<p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <ul style="list-style-type: none"> • [Oil palm products]/[palm oil]/[palm kernel oil] from RSPO-certified mills and plantations were mixed with non-certified oil palm products in the supply chain. 	<p>There is no messaging in storytelling used by PT. Rigunas Agri Utama - Bungo Tebo POM on their products.</p>	<p>Complied</p>

	<ul style="list-style-type: none"> • The volume of [oil palm products][palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations. <p>In off-product communications, reference to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown in company records is allowed.</p> <p>Messaging NOT ALLOWED in storytelling in product-related communications:</p> <ul style="list-style-type: none"> • Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product. 		
<p>Principle 4: Respect community and human rights and deliver benefit</p>			
<p>Respect community rights, provide equal opportunities, maximise benefits from engagement and ensure remediation where needed.</p>			
<p>Criteria 4.1: The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.</p>			
<p>4.1.1</p>	<p>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, supply chain and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>The company has a corporate policy dated 2 March 2020 issued by Head of Operational PT Rigunas Agri Utama No.049/HO/MEMO/INT/03/20, related "Perlindungan terhadap pelapor/pembela hak asasi manusia dari tindakan balas dendam, intimidasi dan pelecehan" (Protection of Human Right Defender from revenge, intimidation and harassment).</p> <p>The policy relating to human rights, is explained in point 13, states 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, caste, national origin, religion/belief, disability, gender, sexual orientation, membership of trade union political affiliation and/or age".</p> <p>The policy has been disseminated to all workers on 07 February 2022, 17 April 2022 and 17 July 2022 and also to all stakeholder and contractors on 9 October 2022.</p> <p>Based on document review and interviews with several stakeholders (LP2LH NGO, Chairman of PUK-SPPP-SPSI Workers Union, gender</p>	<p>Complied</p>

		<p>committee, Tuo Sumay Village Head and Pinang Belai Village Secretary), within the past 3 years (until this surveillance audit was conducted) that there were no cases related to human rights violations occurred at PT RAU.</p> <p>Scheme smallholder:</p> <p>The scheme smallholder has set a policy for each cooperative. This Cooperative Policy has established policies related to:</p> <ul style="list-style-type: none"> - Fulfilments of legal requirements that apply in the implementation of activities in cooperatives - Ethical conduct in doing business in all business transactions and operations - Respect human rights by treating all KUD employees and farmers fairly - Forbid minors to work in every activity - Prevent sexual harassment and various forms of violence against women - Respect every KUD employee or farmer to form or become a member of a trade union and ensure the confidentiality of the reporter (Whistle- blower) - Respect human rights defenders (HRD) without giving threats and intimidation - Do not provide work under threats, sanctions or penalties where workers do not have the freedom to agree to the implementation of the work 	
4.1.2	<p>The unit of certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations.</p> <p>- Minor compliance -</p>	<p>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 Rigunas Agri Utama Plantation.</p>	Complied

		<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> <p>Based on an interview with management (KTU) on behalf of Mr. Mngalatua Sirait at the Plantation and Mr. Soyfan Siburian at the factory and Mr. Samsuardi in Plasma and several PT RAU employees/workers, that there were no mercenaries and paramilitary troops used in operations at PT RAU.</p> <p>Based on interviews with the Chairperson of the Workers' Union Bpk. TJ. Purba and the Gender Committee Ibu Nurbaiti of PT RAU, that until the 2022 period there were no cases or work practices that contained violence or threats against workers.</p>	
<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.</p>			
<p>4.2.1</p>	<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>- Critical (Major) compliance -</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 whistleblower confidentiality policies in the "Case Reporting and Disclosure Guarantee Mechanism" dated June 12, 2015. The purpose of SOP is to provide clear work guidelines so as 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 verbally or directly to the</p>	<p>Complied</p>

		<p>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 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> <p>The above procedure was conveyed and explained to relevant stakeholders including the smallholder through a meeting with all PT RAU's stakeholders on 23-24 May 2022. This socialization was attended by FFB suppliers (both plasma and non-plasma), CPO and kernel transporters (PT Trans Jaya Pertama), contractors (including the CV Selamat Mandiri Pratama replanting contractor) and other stakeholders including (community and leaders in the surrounding villages including head of villages).</p> <p>Based on interviews with smallholder including: the replanting contractor (on behalf of Mr. L. Manalu) and several village heads (Mr. Hazri and Mr. Purwanto), that they are quite familiar with the processes/procedures related to the delivery of information and communication. In general, they will submit it to the Public Relations of PT RAU (Mr. A. Bastari).</p>	
4.2.2	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p> <p>- Minor compliance -</p>	<p>The available procedures are as 4.2.1.</p> <p>The Company consistently carries out procedures related to complaints and also procedures related to violence against workers. This mechanism has been socialized to all workers on 14-16 September 2022 and also to</p>	Complied

		<p>all stakeholder on 10-12 October 2022. In the 2022 period, PT RAU has re-socialized related to internal and external complaint procedures on 13-15 February 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 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 RAU.</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>- Minor compliance -</p>	<p>In this surveillance audit, there was information from interested parties that in the 2022 period there were still complaints from the surrounding community, namely:</p> <ol style="list-style-type: none"> 1. <u>Related to overlapping HGU owned by PT Rigunas Agri Utma with communities of Pinang Belai Village:</u> <p>In the previous audit report, it was explained that there were complaints from the community around the plantation submitted by</p>	Complied

		<p>the Panglimo Djoenid NGO, Tebo district in 2016 regarding the overlap of HGU land with Land Certificates (SHM), namely:</p> <p>The NGO Panglimo Djoenid Tebo Regency reported to the local Polsek (Tebo Regency) with Letter No.11/PDJ/TBO/X/16, September 28 2016. The letter contained a report that there was a group of residents who had legal ownership certificates. (SHM) above the HGU of PT. Rigunas Agri Utama where the area is an oil palm plantation that has produced and has been harvested.</p> <p>The last record in the previous audit, that PT. Rigunas Agri Utama fulfilled the summons from the Tebo District Attorney's Office "Tebo District Attorney Letter No.R-33/L.S.17/Dek.1/11/2020 dated 17 November 2020; To the Plasma Manager of PT. Rigunas Agri Utama; Regarding the Request for Information to Appear; November 11, 2020". At the meeting in November 2020, PT. Rigunas Agri Utama was ordered to show a copy of the HGU. The company representative gave a copy of the HGU to the Attorney General's Office.</p> <p>In this surveillance audit, that PT Rigunas Agri Utama received a 2nd summons from the Tebo District Attorney No. SP-171/L.5.17/F1.1/09/2022 dated 13 September 2022 for a request for information regarding alleged irregularities by PT Rigunas Agri Utama which does not have a Cultivation Rights (HGU) location for plantation areas and is included in a Production Forest Area in Serai Serumun District, Tebo Regency from 1997 to 2012 which is scheduled for September 20, 2022 at the Tebo District Attorney's office. In this regard, the representatives of PT Rigunas Agri Utama have responded and complied with the summons for an inquiry on 20 September 2022 with PT RAU Management representative by Mr. Ahmad Bastari (Public Relations- HUMAS) By bringing the relevant documents, namely:</p> <ol style="list-style-type: none"> a. HGU Document Book No. 1/1997 (Filling List 208 No.397/1997 – Filling List 307 No.175/1997 – 06.03.12.03.2.00001) and the amendment letter; Decree of the Minister of Agrarian Affairs of 	
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		<p>the Head of BPN No. 3-V-2002 dated 28 May 2002 covering an area of 1,604.3 Ha</p> <ul style="list-style-type: none"> b. 'HGU Land Book No.1 (Filling List 208 No.396/1997 – Filling List 307 No.173/1997 – 06.03.06.11.2.00001) and amendment documents; Decree of the State Minister for Agrarian Affairs Head of BPN No.5-VIII-1999 dated 3 August 1999 covering an area of 1,047.3 Ha. c. HGU according to SK Head of BPN Regional Office Jambi Province No.03/HGU/BPN.15/2016, dated 5 August 2016 covering an area of 715.63 Ha. d. Forest Release Decree from the Minister of Forestry (No.771/Kpts-II/93, November 18, 1990) covering an area of 22,710 Ha, <p>As for the results of providing information to the Tebo District Prosecutor's Office, there has been no response from the Tebo District Prosecutor's Office. So that until the Surveillance audit was carried out there were no changes because they had not received results from the Tebo District Attorney. Then it will always be verified at the time of the next visit.</p> <p>When an interview was to be conducted with the Tebo Regency BPN regarding the case mentioned above, the auditor team could not meet because there was a meeting between the Head of the Tebo Regency BPN and the Regent, even when trying to be contacted by telephone there was no answer.</p> <p>2. <u>Leakage of waste liquid distribution pipe for land application;</u></p> <p>On January 2, 2023 there was a complaint from the Tuo Sumay community regarding water pollution in the Sumay River caused by a leaking land application pipeline in Block B19f.</p>	
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		<p>Some of the actions taken by PT Rigunas Agri Utama based on established procedures, namely:</p> <ul style="list-style-type: none"> a) On January 2, 2023 Askep Bungo Tebo Estate identified the environmental impacts caused by pollution and conducted a site survey (Sumay river). On the same day PT RAU has stopped the flow of Land Application and identified the cause, namely the leakage of the LA liquid pipeline in Block B19f. b) On January 4, 2023; replace leaking pipes and at the same time try drainage under supervision to ensure that there are no more pipe leaks. c) Furthermore, PT RAU held a meeting with the Tuo Sumay Village community to develop an action plan for corrective actions to prevent this from happening again, namely: <ul style="list-style-type: none"> - Monitoring the condition of the LA flow pipe once a month - Monitoring the condition of the LA flow pipe once a month. - Ensure that LA pipelines are completely buried in the ground in each LA pipeline - Planning to make wells for the people of Tuo Sumay Village which is located on the edge of the Sumay River, namely Ulo Gedong Hamlet and Tuo Sumay Village. - Perform falt bed washing once a year - Supervise heavy equipment when washing the flat bed by the foreman and system so that there are no broken pipes due to the washing process. d) On January 6, 2023, PT RAU officially reported the incident to the Head of the Tebo Regency Environment and Transportation Service. <p>Based on the complaints and complaints from the community mentioned above, PT Rau has responded to these complaints according to established procedures. In this aduit, interviews were conducted with the</p>	
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		<p>affected community (through the Tuo Sumay Village Head) that PT RAU had responded to complaints from the surrounding community through a good social approach. A field visit was also carried out to block B19f that the leaking pipe had been replaced and had been buried in the ground so that it would not be affected by operational activities in the field and in accordance with recommendations from the DLH Tebo Regency.</p> <p>Some examples related to complaints from smallholder, including:</p> <ul style="list-style-type: none"> - Dated October 25, 2022 on behalf of farmer Baihaki (Farmers Group 21 KUD Sawit Sumay Makmur) regarding road damage in KT 01 and the need for heavy equipment (backhoe loader) to repair the road. This complaint was responded to on October 26, 2022 by providing backhoe loader assistance to be assigned to KT 01. - Grievance from farmers at KUD Sawit Bina Tani, sample complaint dated 27 May 2022 on behalf of farmer Mahyudin (Farmers group 100), complaints related to road conditions in the Farmer Group 100 garden area. The Grievance have been responded to on 30 May 2022 by providing backhoe heavy equipment loans loader and provide stones for paving the damaged road. - KUD Tanjdung Dani Sakti's complaint book record on September 17 2022 regarding receipt of plasma FFB which will be harvested on Sunday September 18 2022, thus requesting that the factory be able to open on that date (because there is an issue that the Mill is not open). The Bungo Tebo factory has responded on the same day, that the Bungo Tebo POM will be open to receive FFB from Plasma by providing each KUD's estimated FFB production for FFB harvest on September 18, 2022. <p>Based on interviews with several PT RAU plasma farmer group heads, that complaints from smallholders have been responded to properly and quickly (no more than 3 days) such as the verification of the farmer complaint documents above.</p>	
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<p>4.2.4</p>	<p>The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.</p> <p>- Minor compliance -</p>	<p>The Company has consistently implemented Procedure no. AA-GL-5003.1-R1 Rev. August 22, 2011 regarding conflict handling procedures, it was explained that if a conflict resolution does not reach an agreement, then several alternative dispute resolution/complaints that can be carried out include:</p> <ol style="list-style-type: none"> 1. Mediation between the two parties or by representatives of the parties who are also mediated by authorized government agencies (for example: BPN, Manpower Office, Environmental Service). 2. Following up on legal conflict resolution or litigation if the conflict/dispute/complaint cannot be resolved through negotiation or mediation. <p>Based on the verification of community complaints/complaints above (indicator 4.2.3), that PT RAU has carried out these procedures consistently in accordance with the established procedures, where:</p> <ul style="list-style-type: none"> - In conflicts related to overlapping land between the HGU owned by PT RAU and the certificate of ownership rights (SHM) of the community around the plantation, as explained in 4.2.3. As a result, an agreement meeting between the two parties was carried out mediated by a third party from the local government (the Land Office and the Tebo Regency) as well and furthermore if an agreement is not reached from this mediation, then legal action will be taken, namely by involving the State Administrative Court. (see 4.2.3). <p>The handling of the LA pipe leak case on January 2, 2023 which resulted in the alleged expansion of the Sumay River, identification and investigations have been carried out related to this incident, and subsequently PT RAU has submitted an official report to the relevant government agency, namely the Tebo Regency Environmental Service. On January 6, 2023.</p>	<p>Complied</p>
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Criteria 4.3: The unit of certification contributes to local sustainable development as agreed by local communities.

<p>4.3.1</p>	<p>Contributions to community development that are based on the results of consultation with local community are demonstrated.</p> <p>- Minor compliance -</p>	<p>PT Rigunas Agri Utama established a CSR (corporate social responsibility) program every year including in 2022 establishing a transparent CSR program discussed with village community representatives. In compiling the 2022 CSR program based on suggestions and requests from surrounding villages which were carried out in January 2022 during the Village Musreimbang (<i>Musyawah Perencanaan Pembangunan Desa - Village Development Planning Meeting</i>), the results of a survey conducted in February 2022, 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 2021 • Identification of village CSR program needs in scope/ring 1 in 2022 • Village CSR Needs Verification Program scope/ring 1 of 2022 • Choice of CSR programs in 2022 • Preparation of the 2022 CSR budget <p>In general, the 2022 CSR Program is classified in several aspects, including:</p> <ol style="list-style-type: none"> a. <u>Education</u>; PT RAU's CSR program is Assistance for the Development of Madrasah Bukit Harapan, Tuo Sumay Village. b. Health; PT. Rigunas Agri Utama also helps to support the improvement of public health through the Free Health Checkup program. c. <u>Infrastructure</u>; Infrastructure that is included in the 2022 CSR program is the construction of drilled wells and the construction of mosque MCK in Tanjung Dani Village, Tuo Sumay Village. This is because the need for clean water in Tanjung Dani Hamlet has increased and the availability of clean water is limited, so that the drill assistance is expected to help meet the community's clean water needs and the mosque's toilets support so that community worship activities in Tanjung Dani Hamlet, Tuo Sumay Village run smoothly. Apart from 	<p>Complied</p>
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		<p>that, there was also assistance for the repair of the main road in the villages of Tuo Sumay and Teriti. This road is the main access for the community in their activities. With this program it is hoped that the daily activities of the community can run smoothly. Finally, there was assistance for mosque and Madrasah materials in Tuo Sumay and Alliedr Jaya Villages.</p> <p>d. <u>Economy</u>; Programs related to the development of the community's economy, namely the provision of livestock for the poor. It is hoped that by offering this, people who are classified as underprivileged can have their own livestock business, so that their income can increase in a sustainable manner. In this way the number of people who cannot be reduced gradually.</p> <p>e. <u>Social</u>; The company's social programs for the surrounding community include: Assistance related to the development of local wisdom for the Tuo Sumay Village community, Donations for Religious Holiday Activities, and Assistance with cooking oil for people in need.</p> <p>Based on interviews with several Tuo Sumay Village Heads (Mr. Hazri) and Pinang Belai Village Secretary, that the CSR program formulated by PT RAU Management was carried out through consultation with community leaders and village heads during the Musrembang (Village Development Planning Meeting) company representatives by Public Relations of PT RAU namely Mr. M. Bastari.</p> <p>Based on PT RAU's CSR Implementation Report for the 2022 Period submitted by PT RAU's Public Relations, several have been realized, including:</p> <ul style="list-style-type: none"> - In 5 August 2022; religious holiday donation program - In August 2022, providing material assistance (in the form of culverts) for the construction of a mosque in Tuo Sumay Village. 	
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		<ul style="list-style-type: none"> - In June 2022, Provided material assistance for the construction of the Bukit Harapan Madrasah, Tuo Sumay Village - In July 2022 provide cooking oil assistance to villages around the Plantation. - In August 2022, provided stone assistance and heavy equipment (motor grader) for road paving in Tuo Sumay Village and Teriti Village. - In August 2022, providing assistance in making mosque MCK in Tanjung Dani Village. - In September 2022, provide free medical assistance in Tuo Sumay Village and Teriti Village. - In November 2022, provide village alternative economic assistance in the form of goats for farming to 3 villages around the plantation. 	
<p>Criteria 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.</p>			
<p>4.4.1</p>	<p>(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed (FPIC) process. Documents related to the history of land tenure and the actual legal or customary use of the land are available.</p> <p>- Critical (Major) compliance -</p>	<p>Bungo Tebo POM and Estate:</p> <p>PT. Rigunas Agri Utama chronological information of the acquisition of land rights and their amendments in a well-organized document consisting of:</p> <p>I. Minutes of Land Inspection "Panitia B" No.02/Pan.B/1994 dated 14 April 1994. Explaining PT. Rigunas Agri Utama proposed a 5,000 Ha HGU for Oil Palm plantations using the PIR TRANS model in Sungai Rambai Village, Sumay District. The results of the examination: have been reserved (Decree of the Governor of the Jambi Region No.176 of 1990) covering an area of 30,000 Ha; Obtained Forest Release Decree from the Minister of Forestry (No.771/Kpts-II/93, dated 18 November 1990) covering an area of 22,710 Ha; The land requested is located in Sungai Rambai Village with an area of 2,316 hectares according to the Special Situation Drawing Map No. 02/1993 dated 29 September 1993; Land condition: in the form of forest; some have been cleared and planted with palm oil covering an area of 150 Ha; Rolling soil conditions with a slope of 10% - 40%; Public</p>	<p>Complied</p>

		<p>Interest and Public Interest: Noobjections, No electricity poles; There are no buildings; Conclusion: The approved land area is 2,318 Ha. Situation Figure No.161/1994 with an area of 2,318.5 Ha.</p> <p>In 1996 PT. Rigunas Agri Utama obtained HGU as stipulated in the HGU Decree based on the Decree of the State Minister for Agrarian Affairs (Head of BPN) No.51/HGU/BPN/96; concerning the Granting of HGU on behalf of PT. Rigunas Agri Utama, dated 27 November 1996. The land granted was 4,388.50 Ha located in Tebo Ulu District and Perwakilan Sumai District, Bungo Tebo Regency, Jambi Province; From the results of the meeting of the Committee B stated that the entire land was 4,388.50 Ha; From the results of the Situation Figure dated 3 May 1994 No.161/1994 (covering an area of 2,318.50 Ha) and on 3 May 1994 No.160/1994 (an area of 2,070 Ha) a total of 4,388.50 Ha. Granted 35-year land use rights for 4,388.50 Ha for PIR TRANS plasma plantations.</p> <p>As a follow-up to the issuance of the HGU Decree, the Bungo Tebo Regency Land Office issued two HGU certificates along with the transition history, namely:</p> <ul style="list-style-type: none"> - HGU Land Book No.1 (Entry List 208 No.397/1997 - Entry List 307 No. 175/1997 - 06.03.12.03.2.00001). Situation Figure No.160 / 1994 dated 3 May1994 covering an area of 2,070 Ha. The HGU is valid for 35 years, until 1 May2032. - There was an amendment based on the Decree of the Minister of State for Agrarian Affairs Head of BPN No.3-V-2002 dated May 28, 2002 concerning theGranting of Permits to Release Part of Business Use Rights over Land located in Bungo Tebo Regency, Jambi Province on land covering an area of 465.70 Ha. Applicable with the revised situation image dated July 19, 2002. So the new area is 2,070 Ha (initial decree) - 465.70 Ha = an area of 1,604.30 Ha. Situation map with a scale of 1: 50,000. - HGU Land Book No.1 (Entry List 208 No.396 / 1997 - Entry List 307 No. 173/1997 - 06.03.06.11.2.00001). Situation Figure No. 160/1994 	
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		<p>dated 3 May 1994 covering an area of 2,318.5 Ha. The HGU is valid for 35 years, until 1 May 2032. There was an amendment based on the Decree of the State Minister for Agrarian Affairs Head of BPN No.5-VIII-1999 dated 3 August 1999 concerning the Granting of Permits to Release Part of Business Use Rights over land located in Bungo Tebo Regency, Jambi Province on land of 636.3 Ha. The new area is 1,682.2 Ha.</p> <ul style="list-style-type: none"> - Then there was a change based on the Decree of the Minister of State for Agrarian Affairs Head of BPN No.3-V-2002 dated 28 May 2002 concerning the granting of Permits to Release Part of Business Use Rights over Land located in Bungo Tebo Regency, Jambi Province, on a land area of 634,846 Ha, so that the new total area became 1,047,354 Ha. Equipped with a Situation Map with a scale of 1:50,000. <p>Important note: The background of the reduction in HGU area is due to limited land reserves for plasma smallholders. On 27 November 1996 according to the request of PT. Rigunas Agri Utama, granted HGU covering an area of 43,88.5 Ha, due to lack of land for plasma farmers, the farmers urged to carry out a lottery of plot, so at the suggestion of the local government of Tebo Regency, part of the core area of PT. Rigunas Agri Utama was allocated as a plasma plantation with the following stages:</p> <ul style="list-style-type: none"> a. Phase I in 1999 covering an area of 636.3 Ha. In accordance with the explanation above: based on the Decree of the Minister of State for Agrarian Affairs Head of BPN No.5-VIII-1999 dated 3 August 1999 concerning the Issuance of Permits for the Release of Partial Business Use Rights over Land located in Bungo Tebo Regency, Jambi Province on a land area of 636.3 Ha. b. Phase II of 2002 covering an area of 1,100.55 Ha. In accordance with the explanation above: based on the Decree of the Minister of State for Agrarian Affairs Head of BPN No.3-V-2002 dated 28 May 	
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		<p>2002 concerning the Granting of Permits to Release Part of Business Use Rights over Land located in Bungo Tebo Regency, Jambi Province on a land area of 465.70 Ha.</p> <p>Based on the description above, it shows that the total HGU area of PT. Rigunas Agri Utama currently amounts to 2,651.654 Ha. Furthermore, based on the Letter of the Director General of Plantation Production Development No. KB/320/265/DJ-BUN.1/V/ 2001 dated 8 May 2001, a statement from the Bupati of Tebo No. 525 /459.1/Disbun dated 26 November 2001 regarding the land area of PT. Rigunas Agri Utama consists of 10,357.55 Ha, consisting of 2,193.85 Ha of nucleus/Inti estates and 8,173.70 Ha of plasma plantations.</p> <p>In 2016, PT. Rigunas Agri Utama obtained HGU in accordance with the Decree of the Head of the Jambi Province BPN Regional Office No.03/HGU/ BPN.15/2016, dated 5 August 2016. The total area granted the right is 715.63Ha and consists of 6 HGU certificates:</p> <ol style="list-style-type: none"> 1. HGU Certificate No. 39 Tuo Sumay Village, dated 19 August 2016. Area: 133.71 Ha. Validity period until 5 August 2046. Based on "Surat Ukur No.28/06.09.00.00/2016 dated 18 August 2016". 2. HGU Certificate No. 40 Teluk Singkawang Village, dated 19 August 2016. Area: 108.06 Ha. Validity period until 5 August 2046. Based on "Surat UkurNo.29/06.09.00.00/2016 dated 18 August 2016". 3. HGU Certificate No. 41 Tuo Sumay Village, dated 19 August 2016. Area: 103.97 Ha. Validity period until 5 August 2046. Based on "Surat Ukur No.30/06.09.00.00/2016 dated 18 August 2016". 4. HGU Certificate No. 42 Tuo Sumay Village, dated 19 August 2016. Area: 74.14 Ha. Validity period until 5 August 2046. Based on "Surat UkurNo.31/06.09.00.00/2016 dated 18 August 2016". 5. HGU Certificate No. 43 Tuo Sumay Village, dated 19 August 2016. Area: 134.02 Ha. Validity period until 5 August 2046. Based on 	
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		<p>"Surat UkurNo.32/06.09.00.00/2016 dated 18 August 2016".</p> <p>6. HGU Certificate No. 44 Pinang Belai Village, dated 19 August 2016. Area: 161.73 Ha. Validity period until 5 August 2046. Based on "Surat UkurNo.33/06.09.00.00/2016 dated 18 August 2016".</p> <p>Therefore the total HGU area of PT. Rigunas Agri Utama as a whole is 3,367.284 Ha. The user's right to the estate is still valid for 35 years until 2051.</p> <p>Scheme Smallholder:</p> <p>The legal ownership for smallholder members was in the form of Land Certificate (Sertifikat Hak Milik/SHM). The smallholder legal ownership obtained in various year period; 2002, 2004, 2014 based on PIR-TRANS program since 1999 up to 2001. The PIR-Trans program was allocated on stateland. The user right to the land is still maintained.</p> <p>PT. Rigunas Agri Utama in Bungo Tebo has been established since the beginning with the PIR TRANS partnership schemes. Currently PT. Rigunas Agri Utama's plasma/scheme smallholders area has been 5,914 hectares since 1995. This activity has been reported to the Dinas Kehutanan dan PerkebunanTebo Regency, Jambi Province in the form of a Plantation Business Activity Development Semester Report. Based on document verification, it shows thatthere has been no additional plasma development since 2000.</p> <p>In this assessment, samples of PT. Rigunas Agri Utama's scheme smallholders land ownership was taken from 5 KUDs, a list of certificate of ownership (Sertifikat Hak Milik) are available, for instance:</p> <ul style="list-style-type: none"> - KUD Barokah: land title / SHM (Sertifikat Hak Milik) of Husein, No. 893 dated 26 September 2002 for area 2.38 ha. - KUD Sawit Bina Tani: land title / SHM (Sertifikat Hak Milik) of Haldan, No. 1015 dated 26 September 2002 for area 1.86 ha. 	
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		<ul style="list-style-type: none"> - KUD Sawit Sumay Makmur: land title / SHM (Sertifikat Hak Milik) of Sarmin, No. 574 dated 04 October 1999 for area 2.00 ha. - KUD Sumber Usaha: land title / SHM (Sertifikat Hak Milik) of Sarmin, No. 407 dated 12 March 2014 for area 1.99 ha. - KUD Tanjung Dani Sakti: land title / SHM (Sertifikat Hak Milik) of Sarmin, No. 968 dated 26 September 2002 for area 1.98 ha. 	
<p>4.4.2</p>	<p>Copies documents evidencing agreement- making processes and negotiated agreements detailing the FPIC process are available and include:</p> <ul style="list-style-type: none"> - Minor compliance - <p>4.4.2a Evidence that a plan has been developed through consultation and discussion held in good faith with all affected groups within the community, with specific assurances that vulnerable, minority and gender groups are asked for their opinions, and that information has been provided to all affected groups, including in it information about the steps taken to involve them in decision making.</p>	<p>Bungo Tebo POM and Estate</p> <p>PT. Rigunas Agri Utama chronological information of the acquisition of land rights and their amendments in a well-organized document consisting of:</p> <p>I. Minutes of Land Inspection "Panitia B" No.02/Pan.B/1994 dated 14 April 1994. Explaining PT. Rigunas Agri Utama proposed a 5,000 Ha HGU for Oil Palm plantations using the PIR TRANS model in Sungai Rambai Village, Sumay District. The results of the examination: have been reserved (Decree of the Governor of the Jambi Region No.176 of 1990) covering an area of 30,000 Ha; Obtained Forest Release Decree from the Minister of Forestry (No.771/Kpts-II/93, dated 18 November 1990) covering an area of 22,710 Ha; The land requested is located in Sungai Rambai Village with an area of 2,316 hectares according to the Special Situation Drawing Map No. 02/1993 dated 29 September 1993; Land condition: in the form of forest; some have been cleared and planted with palm oil covering an area of 150 Ha; Rolling soil conditions with a slope of 10% - 40%; Public Interest and Public Interest: Noobjections, No electricity poles; There are no buildings; Conclusion: The approved land area is 2,318 Ha. Situation Figure No.161/1994 with an area of 2,318.5 Ha.</p> <p>In 1996 PT. Rigunas Agri Utama obtained HGU as stipulated in the HGU Decreebased on the Decree of the State Minister for Agrarian Affairs (Head of BPN) No.51/HGU/BPN/96; concerning the Granting of HGU on behalf of PT. Rigunas Agri Utama, dated 27 November 1996. The land granted was 4,388.50 Ha located in Tebo Ulu District and Perwakilan Sumai District, Bungo Tebo Regency, Jambi Province; From the results of</p>	<p>Not Applicable</p>

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		<p>the meeting of the Committee B stated that the entire land was 4,388.50 Ha; From the results of the Situation Figure dated 3 May 1994 No.161/1994 (covering an area of 2,318.50 Ha) and on 3 May 1994 No.160/1994 (an area of 2,070 Ha) a total of 4,388.50 Ha. Granted 35-year land use rights for 4,388.50 Ha for PIR TRANS plasma plantations.</p> <p>As a follow-up to the issuance of the HGU Decree, the Bungo Tebo Regency Land Office issued two HGU certificates along with the transition history, namely:</p> <ul style="list-style-type: none"> - HGU Land Book No.1 (Entry List 208 No.397/1997 - Entry List 307 No. 175/1997 - 06.03.12.03.2.00001). Situation Figure No.160 / 1994 dated 3 May1994 covering an area of 2,070 Ha. The HGU is valid for 35 years, until 1 May2032. - There was an amendment based on the Decree of the Minister of State for Agrarian Affairs Head of BPN No.3-V-2002 dated May 28, 2002 concerning theGranting of Permits to Release Part of Business Use Rights over Land located in Bungo Tebo Regency, Jambi Province on land covering an area of 465.70 Ha. Applicable with the revised situation image dated July 19, 2002. So the new area is 2,070 Ha (initial decree) - 465.70 Ha = an area of 1,604.30 Ha. Situation map with a scale of 1: 50,000. - HGU Land Book No.1 (Entry List 208 No.396 / 1997 - Entry List 307 No. 173/1997 - 06.03.06.11.2.00001). Situation Figure No. 160/1994 dated 3 May1994 covering an area of 2,318.5 Ha. The HGU is valid for 35 years, until 1 May 2032. There was an amendment based on the Decree of the State Ministerfor Agrarian Affairs Head of BPN No.5-VIII-1999 dated 3 August 1999 concerning the Granting of Permits to Release Part of Business Use Rights over land located in Bungo Tebo Regency, Jambi Province on land of 636.3 Ha. The new area is 1,682.2 Ha. - Then there was a change based on the Decree of the Minister of State for Agrarian Affairs Head of BPN No.3-V-2002 dated 28 May 2002 	
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		<p>concerning the granting of Permits to Release Part of Business Use Rights over Land located in Bungo Tebo Regency, Jambi Province, on a land area of 634,846 Ha, so that the new total area became 1,047,354 Ha. Equipped with a Situation Map with a scale of 1: 50,000.</p> <p>Important note: The background of the reduction in HGU area is due to limited land reserves for plasma smallholders. On 27 November 1996 according to the request of PT. Rigunas Agri Utama, granted HGU covering an area of 43,88.5 Ha, due to lack of land for plasma farmers, the farmers urged to carry out a lottery of plot, so at the suggestion of the local government of Tebo Regency, part of the core area of PT. Rigunas Agri Utama was allocated as a plasma plantation with the following stages:</p> <ul style="list-style-type: none"> - Phase I in 1999 covering an area of 636.3 Ha. In accordance with the explanation above: based on the Decree of the Minister of State for Agrarian Affairs Head of BPN No.5-VIII-1999 dated 3 August 1999 concerning the Issuance of Permits for the Release of Partial Business Use Rights over Land located in Bungo Tebo Regency, Jambi Province on a land area of 636.3 Ha. - Phase II of 2002 covering an area of 1,100.55 Ha. In accordance with the explanation above: based on the Decree of the Minister of State for Agrarian Affairs Head of BPN No.3-V-2002 dated 28 May 2002 concerning the Granting of Permits to Release Part of Business Use Rights over Land located in Bungo Tebo Regency, Jambi Province on a land area of 465.70 Ha. <p>Based on the description above, it shows that the total HGU area of PT. Rigunas Agri Utama currently amounts to 2,651.654 Ha. Furthermore, based on the Letter of the Director General of Plantation Production Development No. KB/320/265/DJ-BUN.1/V/ 2001 dated 8 May 2001, a statement from the Bupati of Tebo No. 525 /459.1/Disbun dated 26</p>	
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		<p>November 2001 regarding the land area of PT. Rigunas Agri Utama consists of 10,357.55 Ha, consisting of 2,193.85 Ha of nucleus/Inti estates and 8,173.70 Ha of plasma plantations. FPIC was not applicable due to land was owned in before FPIC was developed.</p> <p>Based on document verification and statement from government officials, PT.Rigunas Agri Utama did not conduct any new land clearing. However, company established procedure for settling land compensation if new land clearing is necessary for plantation expansion. The procedure established in "Standard Operating Procedure (SOP) No.AA-GL-5003.1-R2.</p> <p>In 2016, PT. Rigunas Agri Utama obtained HGU in accordance with the Decree of the Head of the Jambi Province BPN Regional Office No.03/HGU/ BPN.15/2016, dated 5 August 2016. The total area granted the right is 715.63Ha and consists of 6 HGU certificates.</p> <p>Scheme Smallholders</p> <p>No customary and traditional rights within smallholder's area. For smallholders, legal ownership is in the form of Land Certificate Ownership Right (Sertifikat Hak Milik). The smallholder legal ownership obtained in various year period, 2002, 2004, 2014 based on government's PIR-TRANS program since 1999 up to 2001. The PIR-Trans program was allocated on stateland by government.</p>	
	<p>4.4.2b Evidence that the unit of certification has respected communities to give or withhold their consent to the operations at the time that these decisions were taken;</p>	<p>Bungo Tebo POM and Estate</p> <p>PT. Rigunas Agri Utama demonstrates statement letter from surrounding villages on land process by the company:</p> <ol style="list-style-type: none"> a. "Surat Keterangan Kepala Desa Tuo Sumay No.051/KD/TS/2016", dated 28 January 2016. b. "Surat Keterangan Kepala Desa Teluk Singkawan No.27/SK/HS/2016", dated 28 January 2016. c. "Surat Keterangan Kepala Desa Pinang Belai No.38/SKD/PB/2016", dated 28 January 2016. <p>The letter from village head stated that the area operated by PT. Rigunas</p>	

		<p>Agri Utama for HGU located in Tuo Sumay Village, Teluk Singkawang village and Pinang Belai village, Sumay district, Tebo regency is not under dispute with other party and have not been allocated by another party.</p> <p>Scheme Smallholders</p> <p>No customary and traditional rights within smallholder’s area. For smallholders, legal ownership is in the form of Land Certificate Ownership Right (Sertifikat Hak Milik). The smallholder legal ownership obtained in various year period, 2002, 2004, 2014 based on government’s PIR-TRANS program since 1999 upto 2001. The PIR-Trans program was allocated on stateland by government.</p>	
	<p>4.4.2c Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities. Including the implications for the legal status of their land at the expiry of the unit of certification’s title, concession or lease on the land.</p>	<p>Bungo Tebo POM and Estate</p> <p>The surrounding communities agreed to jointly develop scheme smallholder with the company as nucleus. As explained above, company demonstrate excision of company-owned plantation for smallholder allocation.</p> <p>Scheme Smallholders</p> <p>No customary and traditional rights within smallholder’s area. For smallholders, legal ownership is in the form of Land Certificate Ownership Right (Sertifikat Hak Milik). The smallholder legal ownership obtained in various year period, 2002, 2004, 2014 based on government’s PIR-TRANS program since 1999 up to 2001. The PIR-Trans program was allocated on stateland by government.</p>	
<p>4.4.3</p>	<p>(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Critical (Major) compliance -</p>	<p>Bungo Tebo Estate and Mill</p> <p>Based on the HGU Decree and interview with management, the process of land acquisition until the granted of HGU has been in accordance with the law and with participatory mapping on cadastral mapping system conducted by Land Agency. The Company has a boundary map completed with scale, number of boundary poles and coordinates issued by National Land Agency.</p>	<p>Complied</p>

		<p>Scheme Smallholders</p> <p>No customary and traditional rights within smallholder’s area. For smallholders, legal ownership is in the form of Land Certificate Ownership Right (Sertifikat Hak Milik). The smallholder legal ownership obtained in various year period, 2002, 2004, 2014 based on government’s PIR-TRANS program since 1999 up to 2001. The PIR-Trans program was allocated on stateland by government.</p>	
4.4.4	<p>All relevant information is available in appropriate forms and languages, including assessment of impact, proposed benefit sharing, and legal arrangements.</p> <p>- Minor compliance -</p>	<p>Bungo Tebo Estate and Mill</p> <p>PT. Rigunas Agri Utama has legal documentation, has conducted social impact assessment and environmental impact assessment. All document related to environmental impact assessment report and social impact assessment report, including its monitoring reports is publicly available document, and written in Bahasa Indonesia.</p> <p>Scheme Smallholders</p> <p>No customary and traditional rights within smallholder’s area. For smallholders, legal ownership is in the form of Land Certificate Ownership Right (Sertifikat Hak Milik). The smallholder legal ownership obtained in various year period, 2002, 2004, 2014 based on government’s PIR-TRANS program since 1999 up to 2001. The PIR-Trans program was allocated on stateland by government.</p>	Complied
4.4.5	<p>(C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.</p> <p>- Critical (Major) compliance -</p>	<p>Bungo Tebo Estate and Mill</p> <p>Based on document review and interview with stakeholders, it can be concluded that communities are represented through institutions or representatives of their own choosing. It is because the HGU issuance has been made based on Land Agency’s method of cadastral mapping, which has been involved communities representatives and multi stakeholders meeting.</p> <p>Scheme Smallholders</p> <p>No customary and traditional rights within smallholder’s area. For smallholders, legal ownership is in the form of Land Certificate Ownership</p>	Complied

		Right (Sertifikat Hak Milik). The smallholder legal ownership obtained in various year period, 2002, 2004, 2014 based on government’s PIR-TRANS program since 1999 up to 2001. The PIR-Trans program was allocated on stateland by government.	
4.4.6	There is evidence that implementation of agreement negotiated through FPIC is annually reviewed in consultation with affected parties. - Minor compliance -	<p>Bungo Tebo Estate and Mill</p> <p>Based on interview, document review and stakeholder consultation, the oil palm plantation developed by PT. Rigunas Agri Utama in process for issuance State Minister for Agrarian Affairs (Head of BPN) No.51/HGU/BPN/96; concerning the Granting of HGU for PT. Rigunas Agri Utama, with land of 2,651,654 Ha, dated 27 November 1996; the land was allocated from state land (See 4.4.1). There was no land compensated for oil palm plantation development.</p> <p>The HGU issued in 2016 was allocated from state land, as per the letter from Utama for HGU located in Tuo Sumay Village, Teluk Singkawang village and Pinang Belai village, Sumay district, Tebo regency is not under dispute with other party and have not been allocated by another party.m village head statement: the area proposed by PT. Rigunas Agri.</p> <p>Scheme Smallholders</p> <p>No customary and traditional rights within smallholder’s area. For smallholders, legal ownership is in the form of Land Certificate Ownership Right (Sertifikat Hak Milik). The smallholder legal ownership obtained in various year period, 2002, 2004, 2014 based on government’s PIR-TRANS program since 1999 upto 2001. The PIR-Trans program was allocated on stateland by government.</p>	Complied
<p>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.</p>			
4.5.1	(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available. - Critical (Major) compliance -	<p>Bungo Tebo Estate and Mill</p> <p>Based on interview, document review and stakeholder consultation, the oil palm plantation developed by PT. Rigunas Agri Utama is in accordance with State Minister for Agrarian Affairs (Head of BPN) No.51/HGU/BPN/96;</p>	Complied

		<p>concerning the Granting of HGU for PT. Rigunas Agri Utama, with land of 2,651.654 Ha, dated 27 November 1996; the land was allocated from state land (See 4.4.1). There was no land compensated for oil palm plantation development. Based on document verification and field observation, PT.Rigunas Agri Utama did not conduct any new land clearing.</p> <p>Scheme Smallholders</p> <p>No customary and traditional rights within smallholder’s area. For smallholders, legal ownership is in the form of Land Certificate Ownership Right (Sertifikat Hak Milik). The smallholder legal ownership obtained in various year period, 2002, 2004, 2014 based on government’s PIR-TRANS program since 1999 up to 2001. The PIR-Trans program was allocated on stateland by government.</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>- Critical (Major) compliance -</p>	<p>Bungo Tebo Estate and Mill</p> <p>Based on interview, document review and stakeholder consultation, the oil palm plantation developed by PT. Rigunas Agri Utama is in accordance with State Minister for Agrarian Affairs (Head of BPN) No.51/HGU/BPN/96; concerning the Granting of HGU for PT. Rigunas Agri Utama, with land of 2,651.654 Ha, dated 27 November 1996; the land was allocated from state land (See 4.4.1). There was no land compensated for oil palm plantation development.</p> <p>Scheme Smallholders</p> <p>No customary and traditional rights within smallholder’s area. For smallholders, legal ownership is in the form of Land Certificate Ownership Right (Sertifikat Hak Milik). The smallholder legal ownership obtained in various year period, 2002, 2004, 2014 based on government’s PIR-TRANS program since 1999 up to 2001. The PIR-Trans program was allocated on stateland by government.</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</p>	<p>Bungo Tebo Estate and Mill</p> <p>Based on interview, document review and stakeholder consultation, the oil palm plantation developed by PT. Rigunas Agri Utama is in accordance</p>	Complied

	<p>information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p> <p>- Minor compliance -</p>	<p>with State Minister for Agrarian Affairs (Head of BPN) No.51/HGU/BPN/96; concerning the Granting of HGU for PT. Rigunas Agri Utama, with land of 2,651.654 Ha, dated 27 November 1996; the land was allocated from state land (See 4.4.1). There was no land compensated for oil palm plantation development.</p> <p>The HGU issued in 2016 was allocated from state land, as per the letter from village head statement: the area proposed by PT. Rigunas Agri Utama for HGU located in Tuo Sumay Village, Teluk Singkawang village and Pinang Belai village, Sumay district, Tebo regency is not under dispute with other party and have not been allocated by another party.</p> <p>Based on document verification and statement from government officials, audit team gather information PT. Rigunas Agri Utama did not conduct any new landclearing. However, company established procedure for settling land compensation if new land clearing is necessary for plantation expansion. The procedure established in "Standard Operating Procedure (SOP) No.AA-GL- 5003.1-R2.</p> <p>Scheme Smallholders</p> <p>No customary and traditional rights within smallholder's area. For smallholders, legal ownership is in the form of Land Certificate Ownership Right (Sertifikat Hak Milik). The smallholder legal ownership obtained in various year period, 2002, 2004, 2014 based on government's PIR-TRANS program since 1999 up to 2001. The PIR-Trans program was allocated on stateland by government.</p>	
<p>4.5.4</p>	<p>To ensure local food and water security and as part of the FPIC process, SEIA participation and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of land allocations process.</p> <p>- Minor compliance -</p>	<p>Bungo Tebo Estate and Mill</p> <p>Based on interview, document review and stakeholder consultation, the oil palm plantation developed by PT. Rigunas Agri Utama is in accordance with State Minister for Agrarian Affairs (Head of BPN) No.51/HGU/BPN/96; concerning the Granting of HGU for PT. Rigunas Agri Utama, with land of 2,651.654 Ha, dated 27 November 1996; the land was allocated from</p>	<p>Complied</p>

		<p>state land (See 4.4.1). There was no land compensated for oil palm plantation development.</p> <p>The HGU issued in 2016 was allocated from state land, as per the letter from village head statement: the area proposed by PT. Rigunas Agri Utama for HGU located in Tuo Sumay Village, Teluk Singkawang village and Pinang Belai village, Sumay district, Tebo regency is not under dispute with other party and have not been allocated by another party.</p> <p>Based on document verification and statement from government officials, audit team gather information PT. Rigunas Agri Utama did not conduct any new land clearing. However, company established procedure for settling land compensation if new land clearing is necessary for plantation expansion. The procedure established in "Standard Operating Procedure (SOP) No.AA-GL- 5003.1-R2.</p> <p>Scheme Smallholders</p> <p>No customary and traditional rights within smallholder's area. For smallholders, legal ownership is in the form of Land Certificate Ownership Right (Sertifikat Hak Milik). The smallholder legal ownership obtained in various year period, 2002, 2004, 2014 based on government's PIR-TRANS program since 1999 up to 2001. The PIR-Trans program was allocated on state land by government.</p>	
4.5.5	<p>Evidence is available that the affected communities and rights holders have had the option to access information and advice, that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.</p> <p>- Minor compliance -</p>	<p>Bungo Tebo Estate and Mill</p> <p>Based on interview, document review and stakeholder consultation, the oil palm plantation developed by PT. Rigunas Agri Utama is in accordance with State Minister for Agrarian Affairs (Head of BPN) No.51/HGU/BPN/96; concerning the Granting of HGU for PT. Rigunas Agri Utama, with land of 2,651.654 Ha, dated 27 November 1996; the land was allocated from state land (See 4.4.1). There was no land compensated for oil palm plantation development.</p> <p>The HGU issued in 2016 was allocated from state land, as per the letter from village head statement: the area proposed by PT. Rigunas Agri Utama</p>	Complied

		<p>for HGU located in Tuo Sumay Village, Teluk Singkawang village and Pinang Belai village, Sumay district, Tebo regency is not under dispute with other party and have not been allocated by another party.</p> <p>Based on document verification and statement from government officials, audit team gather information PT. Rigunas Agri Utama did not conduct any new landclearing. However, company established procedure for settling land compensation if new land clearing is necessary for plantation expansion. The procedure established in "Standard Operating Procedure (SOP) No.AA-GL- 5003.1-R2.</p> <p>Scheme Smallholders</p> <p>No customary and traditional rights within smallholder's area. For smallholders, legal ownership is in the form of Land Certificate Ownership Right (Sertifikat Hak Milik). The smallholder legal ownership obtained in various year period, 2002, 2004, 2014 based on government's PIR-TRANS program since 1999 up to 2001. The PIR-Trans program was allocated on stateland by government.</p>	
<p>4.5.6</p>	<p>Evidence is available that the communities or their representatives gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.</p> <p>- Minor compliance -</p>	<p>Bungo Tebo Estate and Mill</p> <p>Based on interview, document review and stakeholder consultation, the oil palm plantation developed by PT. Rigunas Agri Utama is in accordance with State Minister for Agrarian Affairs (Head of BPN) No.51/HGU/BPN/96; concerning the Granting of HGU for PT. Rigunas Agri Utama, with land of 2,651.654 Ha, dated 27 November 1996; the land was allocated from state land (See 4.4.1). There was no land compensated for oil palm plantation development.</p> <p>The HGU issued in 2016 was allocated from state land, as per the letter from village head statement: the area proposed by PT. Rigunas Agri Utama for HGU located in Tuo Sumay Village, Teluk Singkawang village and Pinang Belai village, Sumay district, Tebo regency is not under dispute with other party and have not been allocated by another party.</p>	<p>Complied</p>

		<p>Based on document verification and statement from government officials, audit team gather information PT. Rigunas Agri Utama did not conduct any new landclearing. However, company established procedure for settling land compensation if new land clearing is necessary for plantation expansion. The procedure established in "Standard Operating Procedure (SOP) No.AA-GL- 5003.1-R2.</p> <p>Scheme Smallholders</p> <p>No customary and traditional rights within smallholder's area. For smallholders, legal ownership is in the form of Land Certificate Ownership Right (Sertifikat Hak Milik). The smallholder legal ownership obtained in various year period, 2002, 2004, 2014 based on government's PIR-TRANS program since 1999 up to 2001. The PIR-Trans program was allocated on stateland by government.</p>	
4.5.7	<p>After 15 November 2018, new lands will not be acquired for plantations and mills as a result of recent (after November 2005) expropriations in the national interest (eminent domain) without FPIC process, except in cases of smallholders benefitting from agrarian reform or anti-drug programmes.</p> <p>- Minor compliance -</p>	<p>Bungo Tebo Estate and Mill</p> <p>Based on interview with management, document review and stakeholder consultation, there was no new land acquisition in the scope of certification PT. Rigunas Agri Utama-Bungo Tebo POM and its supply bases.</p> <p>Scheme Smallholders</p> <p>No customary and traditional rights within smallholder's area. For smallholders, legal ownership is in the form of Land Certificate Ownership Right (Sertifikat Hak Milik). The smallholder legal ownership obtained in various year period, 2002, 2004, 2014 based on government's PIR-TRANS program since 1999 up to 2001. The PIR-Trans program was allocated on stateland by government. No scheme smallholders new development after 15 Nov 2018.</p>	Complied
4.5.8	<p>(C) New lands are not acquired in areas inhabited by communities in voluntary isolation.</p> <p>- Critical (Major) compliance -</p>	<p>Bungo Tebo Estate and Mill</p> <p>Based on interview with management, document review and stakeholder consultation, there was no new land acquisition in the scope of</p>	Complied

		<p>certification PT. Rigunas Agri Utama-Bungo Tebo POM and its supply bases.</p> <p>Scheme Smallholders</p> <p>No customary and traditional rights within smallholder’s area. For smallholders, legal ownership is in the form of Land Certificate Ownership Right (Sertifikat Hak Milik). The smallholder legal ownership obtained in various year period, 2002, 2004, 2014 based on government’s PIR-TRANS program since 1999 up to 2001. The PIR-Trans program was allocated on stateland by government.</p>	
<p>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.</p>			
<p>4.6.1</p>	<p>(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.</p> <p>- Critical (Major) compliance -</p>	<p>Bungo Tebo Estate and Mill</p> <p>The Certificate Holder has a procedure to resolve land conflict, Standard Operating Procedure (SOP) No.AA-GL-5003.1-R2 revision 2 dated 8 May 2015 regarding Land Conflict Handling. The SOP described flow process and mechanism to handle land conflict. The SOP has taking into consideration the FPIC guide for RSPO Member 2015, whereby in the SOP has regulate information land conveyance, negotiation, participatory land measurement and other activities including engagement with relevant parties and other parties neighboring the plantation and/or conflict land. Including, identifying whether or not customary, legal or other rights and its compensation calculation.</p> <p>For smallholders, legal ownership is in the form of Land Certificate Ownership Right (Sertifikat Hak Milik). The smallholder legal ownership obtained in various year period, 2002, 2004, 2014 based on PIR-TRANS program since 1999 up to 2001. There is no issue related land dispute between smallholders.</p> <p>Based on interview with management, document review and stakeholder consultation, there was no new land acquisition in the scope of</p>	<p>Complied</p>

		<p>certification PT. Rigunas Agri Utama-Bungo Tebo POM and its supply bases.</p> <p>Scheme Smallholders</p> <p>Since the Plasmas are full managed, the system is following the company's procedure.</p>	
<p>4.6.2</p>	<p>(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	<p>Bungo Tebo Estate and Mill</p> <p>The Certificate Holder has a procedure to resolve land conflict, Standard Operating Procedure (SOP) No.AA-GL-5003.1-R2 revision 2 dated 8 May 2015 regarding Land Conflict Handling. The SOP described flow process and mechanism to handle land conflict. The SOP has taking into consideration the FPIC guide for RSPO Member 2015, whereby in the SOP has regulate information land conveyance, negotiation, participatory land measurement and other activities including engagement with relevant parties and other parties neighboring the plantation and/or conflict land. Including, identifying whether or not customary, legal or other rights and its compensation calculation.</p> <p>For smallholders, legal ownership is in the form of Land Certificate Ownership Right (Sertifikat Hak Milik). The smallholder legal ownership obtained in various year period, 2002, 2004, 2014 based on PIR-TRANS program since 1999 up to 2001. There is no issue related land dispute between smallholders.</p> <p>Based on interview with management, document review and stakeholder consultation, there was no new land acquisition in the scope of certification PT. Rigunas Agri Utama-Bungo Tebo POM and its supply bases.</p> <p>Scheme Smallholders</p> <p>Since the Plasmas are full managed, the system is following the company's procedure.</p>	<p>Complied</p>

4.6.3	<p>Evidence is available that equal opportunities are provided to both men and women to hold land titles for smallholdings (if possible based on local law, customs and/or agreement).</p> <p>- Minor compliance -</p>	<p>Bungo Tebo POM, Estate and Smallholder</p> <p>Explained in 4.4.2 above, the surrounding communities agreed to jointly develop scheme smallholder with the company as nucleus. As explained above, company demonstrate excision of company-owned plantation for smallholder allocation. There was no difference in land title for smallholder – company follows government program to standardize the land size at 2 Ha per household.</p>	Complied
4.6.4	<p>The process and outcomes of any negotiated agreements, compensation and payments are documented with evidence of the participation of affected parties and made available to them.</p> <p>- Minor compliance -</p>	<p>Bungo Tebo POM, Estate and Smallholder</p> <p>PT. Rigunas Agri Utama demonstrated that any negotiated agreements, compensation, and payments are documented with participation of affected parties and made available for review. These evident elaborated as per indicator 4.2.3.</p>	Complied
<p>Criteria 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.</p>			
4.7.1	<p>(C) A mutually agreed procedure for identifying people entitled to compensation is in place.</p> <p>- Critical (Major) compliance -</p>	<p>The Certificate Holder has a procedure to resolve land conflict, Standard Operating Procedure (SOP) No.AA-GL-5003.1-R2 revision 2 dated 8 May 2015 regarding Land Conflict Handling. The SOP described flow process and mechanism to handle land conflict. The SOP has taking into consideration the FPIC guide for RSPO Member 2015, whereby in the SOP has regulate information land conveyance, negotiation, participatory land measurement and other activities including engagement with relevant parties and other parties neighboring the plantation and/or conflict land. Including, identifying whether or not customary, legal or other rights and its compensation calculation.</p> <p>For smallholders, legal ownership is in the form of Land Certificate Ownership Right (Sertifikat Hak Milik). The smallholder legal ownership obtained in various year period, 2002, 2004, 2014 based on PIR-TRANS program since 1999 up to 2001. There is no issue related land dispute between smallholders.</p>	Complied

		<p>Based on interview with management, document review and stakeholder consultation, there was no new land acquisition in the scope of certification PT. Rigunas Agri Utama-Bungo Tebo POM and its supply bases.</p> <p>Scheme Smallholders</p> <p>No customary and traditional rights within smallholder’s area. For smallholders, legal ownership is in the form of Land Certificate Ownership Right (Sertifikat Hak Milik). The smallholder legal ownership obtained in various year period, 2002, 2004, 2014 based on government’s PIR-TRANS program since 1999 upto 2001. The PIR-Trans program was allocated on stateland by government.</p>	
<p>4.7.2</p>	<p>(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.</p> <p>- Critical (Major) compliance -</p>	<p>Bungo Tebo Estate and Mill</p> <p>The Certificate Holder has a procedure to resolve land conflict, Standard Operating Procedure (SOP) No.AA-GL-5003.1-R2 revision 2 dated 8 May 2015 regarding Land Conflict Handling. The SOP described flow process and mechanism to handle land conflict. The SOP has taking into consideration the FPIC guide for RSPO Member 2015, whereby in the SOP has regulate information land conveyance, negotiation, participatory land measurement and other activities including engagement with relevant parties and other parties neighboring the plantation and/or conflict land. Including, identifying whether or not customary, legal or other rights and its compensation calculation.</p> <p>For smallholders, legal ownership is in the form of Land Certificate Ownership Right (Sertifikat Hak Milik). The smallholder legal ownership obtained in various year period, 2002, 2004, 2014 based on PIR-TRANS program since 1999 up to 2001. There is no issue related land dispute between smallholders.</p> <p>Based on interview with management, document review and stakeholder consultation, there was no new land acquisition in the scope of</p>	<p>Complied</p>

		<p>certification PT. Rigunas Agri Utama-Bungo Tebo POM and its supply bases.</p> <p>Scheme Smallholders</p> <p>No customary and traditional rights within smallholder’s area. For smallholders, legal ownership is in the form of Land Certificate Ownership Right (Sertifikat Hak Milik). The smallholder legal ownership obtained in various year period, 2002, 2004, 2014 based on government’s PIR-TRANS program since 1999 up to 2001. The PIR-Trans program was allocated on stateland by government.</p>	
4.7.3	<p>Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.</p> <p>- Minor compliance -</p>	<p>Bungo Tebo Estate and Mill</p> <p>The plantation developed by PT. Rigunas Agri Utama in HGU of 3,367.284 Ha was allocated from state land (no compensation). However, PT. Rigunas Agri Utama is developing scheme smallholder for 2,900 household incorporated in 18 cooperatives whose managing oil palm plantation of 5,914 Ha.</p> <p>Scheme Smallholders</p> <p>No customary and traditional rights within smallholder’s area. For smallholders, legal ownership is in the form of Land Certificate Ownership Right (Sertifikat Hak Milik). The smallholder legal ownership obtained in various year period, 2002, 2004, 2014 based on government’s PIR-TRANS program since 1999 up to 2001. The PIR-Trans program was allocated on stateland by government.</p>	Complied
<p>Criteria 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrated that they have legal customary, or user rights.</p>			
4.8.1	<p>Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.</p>	<p>Bungo Tebo POM, Estate and Smallholder</p> <p>The company has also established a mechanism / procedure for handling land conflicts. Procedure No. AA-GL-5003.1-R1 Rev. 22 August 2011, where it explained that if the conflict resolution did not meet an agreement, then an alternative would be taken through legal or legal channels.</p>	Complied

	<p>- Minor compliance -</p>	<p>Complaints from stakeholders are recorded, the company can prove that all related complaints / complaints from stakeholders have been recorded and monitored for the progress process until the minutes of the meeting and the results of the meeting to discuss these complaints, are taken samples:</p> <p>In 2016 there was a land dispute (overlapping) within the HGU area of PT.Rigunas Agri Utama, as follows:</p> <ul style="list-style-type: none"> - NGO Corruption Monitoring and Rescue of State Assets, Letter No: 002/DPW/PK&PHN/JB/KU/VI/2016, dated 25 June 2016. The letter contains indications that PT. Rigunas Agri Utama is cultivated the land outside HGU. - The Panglimo Djoenid NGO, Tebo Regency, reported to the local Police (Kabupaten Tebo) with Letter No.11/PDJ/TBO/X/16, dated 28 September 2016. The letter contained reports that a group of residents had a legal ownership certificate (SHM) above the HGU of PT. Rigunas Agri Utama where the area is a producing oil palm plant and has been harvested. <p>All of these problems/disputes/grievance have been mediated by the Regent of Tebo through Letter No. 005/1347/Disbun/2016, dated 16 November 2016 and also by the Plantation Office of Tebo Regency through letter No. 525/395/Disbun/2016, dated 28 November 2016.</p> <p>The results of the meeting/mediation concluded that the disputed area would be resolved legally through an inventory of the legality aspects where the collection of 294 community copyrights of ownership certificates (SHM) was issued in 2016 and the HGU of PT. Rigunas Agri Utama will be produced/compared together. In addition, a participatory field check will be carried out to ensure that disputed locations can be traced.</p> <p>On 30 November 2016 a meeting was held with the conclusion that the field checking was postponed after data synchronization was carried out.</p>	
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		<p>Data synchronization will be carried out at the Jambi Provincial Office (Kantor Kementerian Agraria dan Tata Ruang/BPN Provinsi Jambi). The Minutes of the Meeting were signed by various parties, including:</p> <ol style="list-style-type: none"> a. Plt. Sekretaris Daerah Kabupaten Tebo b. Kepala Kantor Kesbangpol Kabupaten Tebo c. Kapolsek Serai Serumpun d. KBO Intelkam Polres Tebo e. Kabid Bina Usaha Dinas Perkebunan Tebo f. Kasi Survey, Pengukuran dan Pemetaan BPN Tebo g. Kasi HT&PT BPN Kabupaten Tebo h. Kasi Wasnas Kantor Kesbangpol Kabupaten Tebo i. Kasi Rehabilitasi Kantor LH Kabupaten Tebo j. Kasi Trantib Kecamatan Serai Serumpun k. Staf Dinas Kehutanan Kabupaten Tebo l. GM PT. Rigunas Agri Utama m. Humas PT. Rigunas Agri Utama n. GIS PT. Rigunas Agri Utama <p>On 13 August 2019, a mediation was held which was attended by the Mitra Serumpun Farmer Group (Community), representative of PT. Rigunas Agri Utama management, Police, the Indonesian National Army and the National Land Agency (BPN) with an agenda to discuss conflicts over alleged overlapping of PT. Rigunas Agri Utama's HGU with certificates Community Ownership Rights (Farmer Groups), and the results of the mediation are contained, as follows:</p> <ol style="list-style-type: none"> a. Whereas on the basis of suggestions and input from the Tebo Regency Police and the Indonesian National Army (TNI), to maintain the conducive security and comfort of the environment at the location 	
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		<p>of the object of the dispute, PT. Rigunas Agri Utama and the community (Mitra Serumpun Farmer Group) are asked to refrain by not carrying out activities on the land of the disputed object while waiting for a further legal process which has permanent legal force.</p> <p>b. Whereas both parties must maintain security and order of the environment in the object of dispute and not do things that violate the law</p> <p>c. Whereas it was requested to PT. Rigunas Agri Utama to immediately process a Lawsuit application to the State Administrative Court (Pengadilan Tata Usaha Negara).</p> <p>d. Whereas for point (a) above, PT. Rigunas Agri Utama is requested to be able to provide an answer no later than 14 (fourteen) days after receiving this letter.</p> <p>Furthermore, PT. Rigunas Agri Utama has provided responses and answers to the above mediation results on 13 August 2019 through letter No. 06/LG- RIGUNAS/Ext/VIII/19, contains:</p> <ul style="list-style-type: none"> - PT. Rigunas Agri Utama controls and operates a plot of oil palm plantation in Sungai Rambai Village, Tebo Ulu District, Tebo Regency, Jambi Province covering an area of 1,047.354 Ha as referred to in the HGU certificate No.17 (formerly No.1, 1 May 1997) granted based on the Decree of Minister of Land/Head of National Land Agency No. 51/HGU/BPN/1996 dated 27 November 1996. That PT. Rigunas Agri Utama hopes that the law enforcement officials can maintain conduciveness from community disturbances that intend to seize, harvest or obstruct PT. Rigunas Agri Utama's plantation activities That the HGU has been owned / controlled and planted with oil palm since 1996 without any claim from the community or from any party. - PT. Rigunas Agri Utama fulfilled summon letter from Tebo Regency Court "Surat Kejaksaan Negeri Tebo No.R-33/L.S.17/Dek.1/11/2020; Kepada Manager Plasma PT. Rigunas Agri Utama; Perihal Permintaan Keterangan untuk menghadapi 17 November 2020; Tanggal 11 	
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		<p>November 2020". During the meeting in November 2020, PT. Rigunas Agri Utama ordered to present the copy of HGU. Company representative gave the copy of HGU to court.</p> <p>Update on ASA 1.1:</p> <ul style="list-style-type: none"> - The Attorney of Tebo Regency sent a letter to PT RAU No. SP-170L517 FL109/2022 dated 13 September 2022, regarding request for information of company's historical legality. - PT RAU based on letter No. 05/LG-RIGUNAS/Est/IX/22 dated 19 September 2022 responded the letter and described the historical of company's legality grants. <p>Scheme Smallholders</p> <p>No customary and traditional rights within smallholder's area. For smallholders, legal ownership is in the form of Land Certificate Ownership Right (Sertifikat Hak Milik). The smallholder legal ownership obtained in various year period, 2002, 2004, 2014 based on government's PIR-TRANS program since 1999 upto 2001. The PIR-Trans program was allocated on stateland by government.</p>	
<p>4.8.2</p>	<p>(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.</p> <ul style="list-style-type: none"> - Critical (Major) compliance - 	<p>Bungo Tebo Estate and Mill</p> <p>The company has established a mechanism / procedure for handling land conflicts. Procedure No. AA-GL-5003.1-R1 Rev. 22 August 2011, where it explained that if the conflict resolution did not meet an agreement, then an alternative would be taken through legal or legal channels.</p> <p>Complaints from stakeholders are recorded, the company can prove that all related complaints / complaints from stakeholders have been recorded and monitored for the progress process until the minutes of the meeting and the results of the meeting to discuss these complaints, are taken samples:</p> <ol style="list-style-type: none"> 1) In 2016 there was a land dispute (overlapping) within the HGU area of PT.Rigunas Agri Utama, as follows: 	<p>Complied</p>

		<p>a. NGO Corruption Monitoring and Rescue of State Assets, Letter No: 002/DPW/PK&PHN/JP/KU/VI/2016, dated 25 June 2016. The letter contains indications that PT. Rigunas Agri Utama is cultivated the land outside HGU.</p> <p>b. The Panglimo Djoenid NGO, Tebo Regency, reported to the local Police(Kabupaten Tebo) with Letter No.11/PDJ/TBO/X/16, dated 28 September 2016. The letter contained reports that a group of residents had a legal ownership certificate (SHM) above the HGU of PT. Rigunas Agri Utama where the area is a producing oil palm plant and has been harvested.</p> <p>All of these problems/disputes/grievance have been mediated by the Regent of Tebo through Letter No. 005/1347/Disbun/2016, dated 16 November 2016 and also by the Plantation Office of Tebo Regency through letter No. 525/395/Disbun/2016, dated 28 November 2016.</p> <p>The results of the meeting/mediation concluded that the disputed area would be resolved legally through an inventory of the legality aspects where the collection of 294 community copyrights of ownership certificates (SHM) was issued in 2016 and the HGU of PT. Rigunas Agri Utama will be produced/compared together. In addition, a participatory field check will be carried out to ensure that disputed locations can be traced.</p> <p>On 30 November 2016 a meeting was held with the conclusion that the field checking was postponed after data synchronization was carried out. Data synchronization will be carried out at the Jambi Provincial Office (Kantor Kementerian Agraria dan Tata Ruang/BPN Provinsi Jambi). The Minutes of the Meeting were signed by various parties, including:</p> <ul style="list-style-type: none"> a. Plt. Sekretaris Daerah Kabupaten Tebo b. Kepala Kantor Kesbangpol Kabupaten Tebo c. Kapolsek Serai Serumpun 	
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		<p>d. KBO Intelkam Polres Tebo e. Kabid Bina Usaha Dinas Perkebunan Tebo f. Kasi Survey, Pengukuran dan Pemetaan BPN Tebo g. Kasi HT&PT BPN Kabupaten Tebo h. Kasi Wasnas Kantor Kesbangpol Kabupaten Tebo i. Kasi Rehabilitasi Kantor LH Kabupaten Tebo j. Kasi Trantib Kecamatan Serai Serumpun k. Staf Dinas Kehutanan Kabupaten Tebo l. GM PT. Rigunas Agri Utama m. Humas PT. Rigunas Agri Utama n. GIS PT. Rigunas Agri Utama</p> <p>On 13 August 2019, a mediation was held which was attended by the Mitra Serumpun Farmer Group (Community), representative of PT. Rigunas Agri Utama management, Police, the Indonesian National Army and the National Land Agency (BPN) with an agenda to discuss conflicts over alleged overlapping of PT. Rigunas Agri Utama's HGU with certificates Community Ownership Rights (Farmer Groups), and the results of the mediation are contained, as follows:</p> <p>a. Whereas on the basis of suggestions and input from the Tebo Regency Police and the Indonesian National Army (TNI), to maintain the conducive security and comfort of the environment at the location of the object of the dispute, PT. Rigunas Agri Utama and the community (Mitra Serumpun Farmer Group) are asked to refrain by not carrying out activities on the land of the disputed object while waiting for a further legal process which has permanent legal force.</p> <p>b. Whereas both parties must maintain security and order of the environment in the object of dispute and not do things that violate the law</p>	
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		<p>c. Whereas it was requested to PT. Rigunas Agri Utama to immediately process a Lawsuit application to the State Administrative Court (PengadilanTata Usaha Negara).</p> <p>d. Whereas for point (a) above, PT. Rigunas Agri Utama is requested to be able to provide an answer no later than 14 (fourteen) days after receivingthis letter.</p> <p>Furthermore, PT. Rigunas Agri Utama has provided responses and answers tothe above mediation results on 13 August 2019 through letter No. 06/LG- RIGUNAS/Ext/VIII/19, contains:</p> <ul style="list-style-type: none"> - PT. Rigunas Agri Utama controls and operates a plot of oil palm plantationin Sungai Rambai Village, Tebo Ulu District, Tebo Regency, Jambi Provincecovering an area of 1,047.354 Ha as referred to in the HGU certificate No. 17 (formerly No.1, 1 May 1997) granted based on the Decree of Minister of Land/Head of National Land Agency No. 51/HGU/BPN/1996 dated 27 November 1996. - That PT. Rigunas Agri Utama hopes that the law enforcement officials canmaintain conduciveness from community disturbances that intend to seize,harvest or obstruct PT. Rigunas Agri Utama's plantation activities - That the HGU has been owned / controlled and planted with oil palm since1996 without any claim from the community or from any party. <p>Latest update, PT. Rigunas Agri Utama fulfilled summon letter from Kejaksaan Negeri Tebo "Surat Kejaksaan Negeri Tebo No.R-33/L.S.17/Dek.1/11/2020; Kepada Manager Plasma PT. Rigunas Agri Utama; Perihal Permintaan Keterangan untuk menghadap 17 November 2020; Tanggal 11 November 2020". During the meeting in November 2020, PT. Rigunas Agri Utama ordered to present the copy of HGU. Company representative gave the copy of HGU toKejaksaan.</p> <p>Update on ASA 1.1:</p>	
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		<ul style="list-style-type: none"> - The Attorney of Tebo Regency sent a letter to PT RAU No. SP-170L517 FL109/2022 dated 13 September 2022, regarding request for information of company’s historical legality. - PT RAU based on letter No. 05/LG-RIGUNAS/Est/IX/22 dated 19 September 2022 responded the letter and described the historical of company’s legality grants. <p>Scheme Smallholders No customary and traditional rights within smallholder’s area. For smallholders, legal ownership is in the form of Land Certificate Ownership Right (Sertifikat Hak Milik). The smallholder legal ownership obtained in various year period, 2002, 2004, 2014 based on government’s PIR-TRANS program since 1999 upto 2001. The PIR-Trans program was allocated on stateland by government.</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>- Minor compliance -</p>	<p>Bungo Tebo Estate and Mill Based on interview with management, document review and stakeholder consultation, there was no new land acquisition in the scope of certification PT. Rigunas Agri Utama-Bungo Tebo POM and its supply base.</p> <p>Scheme Smallholders No customary and traditional rights within smallholder’s area. For smallholders, legal ownership is in the form of Land Certificate Ownership Right (Sertifikat Hak Milik). The smallholder legal ownership obtained in various year period, 2002, 2004, 2014 based on government’s PIR-TRANS program since 1999 upto 2001. The PIR-Trans program was allocated on stateland by government.</p>	Complied
4.8.4	<p>For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable).</p> <p>- Minor compliance -</p>	<p>Bungo Tebo Estate and Mill PT. Rigunas Agri Utama has mapped the area accused of overlapping with map “Peta Identifikasi Kepemilikan Lahan” scale 1:43.082. The complainant does not willing to state where their land located.</p> <p>Scheme Smallholders</p>	Complied

		<p>No customary and traditional rights within smallholder’s area. For smallholders, legal ownership is in the form of Land Certificate Ownership Right (Sertifikat Hak Milik). The smallholder legal ownership obtained in various year period, 2002, 2004, 2014 based on government’s PIR-TRANS program since 1999 upto 2001. The PIR-Trans program was allocated on stateland by government.</p>	
<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>			
<p>5.1.1</p>	<p>Current and previous period prices for FFB are publicly available and accessible by smallholders. - Minor compliance -</p>	<p>During ASA1_1 has verified that the FFB price set for the plantation that supplies FFB to Bunga Tebo POM is divided into two, namely outgrowers and Scheme Smallholder FFB. The price outgrower/third parties FFB is determined based on market mechanism.</p> <p>The price of Scheme Smallholder’s FFB is determined based on the FFB Pricing Meeting of the Jambi Provincial Plantation Office, which is updated once a week. For example, for the period December 2022 and January 2023 based on the "Results of the Meeting on the Price of Oil Palm FFB for the period December 2022 and January 2023", the FFB price is determined on the basis of:</p> <ul style="list-style-type: none"> a. Average CPO price: IDR 9,230.63/kg. b. Average PK price: IDR 4,360.65/kg. c. "K" index: 87,66%. <p>However, there is changes in FFB price for scheme smallholder (See 5.1.3) Current and previous FFB price for scheme smallholders are available on the signboard in front of the Mill and informed to the Cooperative. For example, the FFB prices on 22 January 2022 for OP 20-25 year is IDR 2,340.</p>	<p>Complied</p>

<p>5.1.2</p>	<p>(C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders. - Critical (Major) compliance -</p>	<p>During ASA1_1 has verified that the Koperasi get the information of FFB price from “Tim Penetapan Harga TBS” (FFB pricing team of Jambi Province). The company can demonstrate minutes of agreed FFB price, “Berita Acara Kesepakatan Harga TBS Petani Plasma” between the company and Koperasi. Effective 1 September 2020, PT. Rigunas Agri Utama and 18 cooperatives scheme smallholder agreed to use outgrower FFB price for scheme smallholder FFB price. PT. Rigunas explains the FFB pricing for outgrower, now in place. Current and previous FFB price for scheme smallholders are available on the signboard in front of the Mill and informed to the Cooperative. For example, the FFB prices on 22 January 2022 for OP 20-25 year is IDR 2,340.</p>	<p>Complied</p>
<p>5.1.3</p>	<p>(C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented. - Critical (Major) compliance -</p>	<p>During ASA1_1 has verified that the prices of FFB from smallholder of PT. Rigunas Agri Utama is based on FFB Prices that has determined by Dinas Perkebunan. For premium pricing, management of PT Rigunas Agri Utama – Bungo Tebo Plasma has committed to share the RSPO premium price in accordance with the agreement with their smallholder. Premium sharing is not distributed in the form of money but in the form of smallholder empowerment activities aimed at increasing the competence, supporting infrastructure and competitiveness of smallholders based on participatory suggest from the smallholders. During this audit obtained information that the premium sharing for Bungo Tebo Plasma has been distributed to smallholder in August 2022, verified sample document i.e. 'Minute of the Symbolic Submission of KUD Barokah Premium Sharing Funds/ <i>Berita Acara Penyerahan Simbolis Dana Premium Sharing KUD</i>’ from Head Smallholder Management PT RAU to Head of KUD Sawit Tanduk Perkasa, KUD Produsesn Sawit Sumay Makmur, KUD Sawit Makmur Bersama and KUD Sawit Karya Makmur in August 2022.</p>	<p>Complied</p>

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		<p>Based on review document, the distribution of premium sharing Y2022 for examples:</p> <ul style="list-style-type: none"> - Road maintenance in area KUD Sawit Tanduk Perkasa, KUD Produsesn Sawit Sumay Makmur, KUD Sawit Makmur Bersama and KUD Sawit Karya Makmur in August 2022. - Local business development by providing fruit seeds, for 18 KUD, for example seeds of durian, mango, avocado and guava in December 2022. - Support equipment for KUD, for example: Distribution of PPE for KUD Sawit Tanjung Dani Sakti, KUD Pordusen Sumay Jaya, KUD Sumber Usaha, and KUD Produsen Sumay Makmur in December 2022; Distribution of Fire Extinguisher for KUD Tanjung Dani Sakti, KUD Produses Sumay Jaya, KUD Sumber Usaha, KUD Produses Sawit Sumay Makmur (SP1), KUD Belarik Jaya and KUD Sawit Tamabara Jaya in December 2022; Sound System for KUD Produses Sawit Tanjung Dani Sakti in December 2022; purchase of 1 unit printer for KUD Produses Sumay Jaya in December 2022. 	
<p>5.1.4</p>	<p>(C) Evidences is available that all parties, including women and independent representative organization assisting smallholders where requested, are involved in the decision making processes and understand the contracts. These include involving finance, loans/credits, and re-payments through FFB price reductions for replanting and/or, other support mechanisms where applicable. - Critical (Major) compliance -</p>	<p>The smallholder’s member of Bungo Tebo Plasma originated from government transmigration program on 1990 – 1991. Mostly from East Java, West Java and local area (Jambi Province). Based on information obtained during the onsite audit known that some of smallholders’ member were women. The annual meeting of KUD always invited all members which is some women. All the decision made was involved the smallholder members, including women members.</p>	<p>Complied</p>
<p>5.1.5</p>	<p>Contracts are fair, legal and transparent and have an agreed timeframe. - Minor compliance -</p>	<p>All smallholders who registered as supply bases to Bungo Tebo POM have agreement with PT. Rigunas Agri Utama – Bungo Tebo. The timeframe of the contract is 1 cycle period (25 years) since first planting. Through the interview with FFB supplier of PDASAN Jaya and UD Royal (supplied to Bungo Tebo POM) obtained information that the FFB price only updated if any changes. However, the FFB payments maximum 3</p>	<p>Complied</p>

		<p>days after the mill received the FFB (according to the contract). There is no dispute related to FFB payments so far.</p> <p>Based on document all contracts are written in Bahasa Indonesia.</p>	
<p>5.1.6</p>	<p>(C) Agreed payments are made in a timely manner and receipts specifying price, weigh, deductions and amount paid are given.</p> <p>- Critical (Major) compliance -</p>	<p>During ASA1_1 has verified that the payments are made in timely manner and receipts specifying price, weight, deductions and amount paid are available.</p> <p>Sample seen: "Rekap Pembayaran TBS Plasma Per KT" period 23 – 28 January 2023.</p> <ol style="list-style-type: none"> 1. Cooperative: Koperasi Tanjung Dani Sakti <ol style="list-style-type: none"> a. Farmer Group: D16001 / KT-21 Tanjung Dani b. Bank: BRI Muaro Tebo c. Total FFB: 63,410 kg d. Gross payment: IDR 145,428 ,540 e. Deduction: 0 f. Nett payment: IDR 145,428 ,540 2. Cooperative: Sawit Bina Tani <ol style="list-style-type: none"> a. Farmer Group: D12005 / KT-123 Sumber Pangan b. Bank: BRI Rimbo Bujang c. Total FFB: 7,645 kg d. Gross payment: IDR 17,574,030 e. Deduction: 0 f. Nett payment: IDR 17,574,030 3. Cooperative: Produsen Sawit Sumay Makmur <ol style="list-style-type: none"> a. Farmer Group: D12005 / KT-07 Tani Makmur 	<p>Complied</p>

		<p>b. Bank: BRI Rimbo Bujang c. Total FFB: 13,289 kg d. Gross payment: IDR 30,363,480 e. Deduction: 199,335 (Road maintenance) f. Nett payment: IDR 30,164,145</p> <p>4. FFB supplier: SDR a. Bank: BRI Unit Muara Tebo b. Total FFB: 157,979 kg (period January 2023) at price IDR 2,274/kg c. Gross payment: IDR 360,192,120 d. Tax VAT 10%: IDR 39,621,133 e. Nett payment: IDR 399,813,253</p>	
5.1.7	<p>Weighing equipment is verified by an independent third party on a regular basis. - Minor compliance -</p>	<p>During ASA1_1 has verified that there are two weighbridges used in Bungo Tebo POM that has been periodically calibrated by the local authority, the verified document as follows:</p> <ol style="list-style-type: none"> 1. Brand: Avery Weigh Tronix; Type/SN ZM.510:213650251; Capacity 50,000 kg; has been calibrated on 31 October 2022 by UPTD Metrologi Legal Kabupaten Tebo, certificate No. 510.3/56/DISPERINDAGNAKER-MET/SKHP/X/2022, valid until October 2023. 2. Brand: Presica; Type/SN PSC 6801S/SN 00231; Capacity 50,000 kg; has been calibrated on 1 March 2022 by UPTD Metrologi Legal Kabupaten Tebo, certificate No. 510.3/56/DISPERINDAGNAKER-MET/SKHP/X/2022, valid until February 2023. 	Complied
5.1.8	<p>The unit of certification supports Independent smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholder on who runs the Internal Controlling System (ICS), who holds the certificate, and who owns and sells certified materials.</p>	<p>During ASA1_1, audit team has conducted interview to the management and document review regarding the support from organization to the independent smallholders, obtained evidence that the organization has conducted assistance in measuring farmers' land around the Company</p>	Complied

	<p>- Minor compliance -</p>	<p>with area 287 Ha for legality arrangements (increasing legality to SHM) in November 2022.</p> <p>In addition, the company has provided training regarding Best Management Practises, OHS, HCV for Independent Smallholders around the organization on 22 April 2022. Verified document such as note of meeting, attendance list and photo.</p>	
<p>5.1.9</p>	<p>(C) The unit of certification has a grievance mechanism for smallholders, and all grievances raised are dealt with in a timely manner.</p> <p>- Critical (Major) compliance -</p>	<p>Bungo Tebo POM & Estate:</p> <p>Procedures related to complaints from stakeholders and including smallholders have been implemented consistently by PT RAU, where processes and mechanisms related to grievance/complaints/communication and responses from stakeholders or smallholders have been carried out properly in accordance with established procedures.</p> <p>The Company has 3 procedures related to communication, information and consultation and also related to the grievance and complaint form stakeholder and smallholder as well, namely:</p> <ul style="list-style-type: none"> • <i>Penanganan Permintaan Informasi Stakeholder</i> (SOP AA-GL- 5008.1-R1,dated 22 Aug 2011). Which explains the company responses against all information request sent by stakeholders including response time of 14 working days after information request accepted • Handling of Community Complaints; in this case including smallholder farmers (independent or plasma): SOP AA-GL-510.1-R0, dated 1 Jan 2013; Penagnan keluhan masyarakat. <p>The responsibility related to the these procedures (Bungo Tebo Group (Mill, Estate and Smallholders) is Mr. Ahmad Bastari as nominated management official with letter Memorandum No. 037/HR-RO3/MEMO/11/2018 from Manager KLO dated 6 November 2018 related Reassignment of Bpk. Ahmad Bastari as Public Relations at PT Rigunas Agri Utama until this surveillance audit preformed.</p> <p>The above procedure was conveyed and explained to relevant stakeholders including the smallholder through a meeting with all PT</p>	<p>Complied</p>

		<p>RAU's stakeholders on 23-24 May 2022. This socialization was attended by FFB suppliers (both plasma and non-plasma), CPO and kernel transporters (PT Trans Jaya Pertama), contractors (including the CV Selamat Mandiri Pratama replanting contractor) and other stakeholders including (community and leaders in the surrounding villages including head of villages).</p> <p>Based on interviews with smallholder including: the replanting contractor (on behalf of Mr. L. Manalu) and several village heads (Mr. Hazri and Mr. Purwanto), that they are quite familiar with the processes/procedures related to the delivery of information and communication. In general, they will submit it to the Public Relations of PT RAU (Mr. A. Bastari).</p> <p>Some examples related to complaints from smallholder, including:</p> <ul style="list-style-type: none"> - Dated October 25, 2022 on behalf of farmer Baihaki (Farmers Group 21 KUD Sawit Sumay Makmur) regarding road damage in KT 01 and the need for heavy equipment (backhoe loader) to repair the road. This complaint was responded to on October 26, 2022 by providing backhoe loader assistance to be assigned to KT 01. - Grievance from farmers at KUD Sawit Bina Tani, sample complaint dated 27 May 2022 on behalf of farmer Mahyudin (Farmers group 100), complaints related to road conditions in the Farmer Group 100 garden area. The Grievance have been responded to on 30 May 2022 by providing backhoe heavy equipment loans loader and provide stones for paving the damaged road. - KUD Tanjdung Dani Sakti's complaint book record on September 17 2022 regarding receipt of plasma FFB which will be harvested on Sunday September 18 2022, thus requesting that the factory be able to open on that date (because there is an issue that the Mill is not open). The Bungo Tebo factory has responded on the same day, that the Bungo Tebo POM will be open to receive FFB from Plasma by providing each KUD's estimated FFB production for FFB harvest on September 18, 2022. 	
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		<p>Based on interviews with several PT RAU plasma farmer group heads, that complaints from smallholders have been responded to properly and quickly (no more than 3 days) such as the verification of the farmer complaint documents above.</p>	
<p>Criteria 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.</p>			
<p>5.2.1</p>	<p>The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification.</p> <p>- Minor compliance -</p>	<p>PT RAU has a partnership cooperation program with village oil palm farmers around the plantations as "Program Kemitraan Plasma/Scheme smallholder" with a cooperative of 18 oil palm farmer cooperatives.</p> <p>The 18 cooperatives are spread across 11 villages around the PT RAU plantation (Tuo Sumay Village, Teriti Village, Kandang Village, Pinang Belai Village, Alliedr Jaya Village, Bukit Pamuatan Village, Napal Putih Village, Sako Makmur Village, Bungo Tanjung Village, Tambun Village Arang, Jati Belarik Village), so that the oil palm farmers around the PT RAU plantation are members of Plasma (Scheme Smallholder) and the rest are smallholder rubber plantations and only a small portion are oil palm farmers (palm oil plantations in their yards).</p> <p>So that they become inclusive smallholders from PT RAU and have been included in the scope of RSPO certification since 2016. PT RAU routinely provides guidance to plasma smallholders.</p> <p>The realization PT RAU Plasma development program on 2022 period, as follow:</p> <ul style="list-style-type: none"> - Farmer Training in Certification Preparation was carried out on 23 June 2022 - Independent Smallholder Coordination Meetings are held 2 times a year, the last one was in November 2022 <p>In the 2020-2021 period, PT RAU has planned a palm oil development program for the surrounding community by establishing a KKPA scheme in Tuo Sumay Village covering an area of 375 hectares through the Mitra Berkah Bersama Consumer Cooperative. Socialization of the profit sharing 70:30 TKD (<i>Tanah Kas Desa</i> - Village Treasury Land) pattern partnership</p>	<p>Complied</p>

		<p>with prospective KKPA farmers Tuo Sumay – PT Rigunas Agri Utama has been carried out on 2 September 2021.</p> <p>In the 2022 period there are no changes related to the development of smallholder schemes at PT RAU, that there are 375 Ha in partnership with the KKPA scheme.</p> <p>KKPA (Primary Cooperative Credit for Members) is a type of credit, both investment credit and working capital credit provided by the Bank to Primary Cooperatives, to be passed on to its members to finance productive businesses, with the aim of increasing the income and welfare of Cooperative/KUD members .</p>																															
<p>5.2.2</p>	<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>- Minor compliance -</p>	<p>For Scheme Smallholder</p> <p>Based on document verification and interview to the stakeholders during ASA1_1, PT Rigunas Agri Utama has a partnership cooperation program with village oil palm farmers around the plantations as “Program Kemitraan Plasma/Scheme smallholder” with a cooperative of 18 oil palm farmer cooperatives, as follow:</p> <table border="1" data-bbox="1093 884 1906 1380"> <thead> <tr> <th>No</th> <th>KUD</th> <th>Village</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Koperasi Tanjung Dani Sakti</td> <td>Tuo Sumay</td> </tr> <tr> <td>2</td> <td>Koperasi Sumay Jaya</td> <td>Tuo Sumay</td> </tr> <tr> <td>3</td> <td>Koperasi Sumber Usaha</td> <td>Tuo Sumay</td> </tr> <tr> <td>4</td> <td>Koperasi Bina Tani</td> <td>Sungai Rambai</td> </tr> <tr> <td>5</td> <td>Koperasi Belarik Jaya</td> <td>Jati Belarik</td> </tr> <tr> <td>6</td> <td>Koperasi Sawit Tambara Jaya</td> <td>Tambun Arang</td> </tr> <tr> <td>7</td> <td>Koperasi Tunas Harapan</td> <td>Teluk Langkap</td> </tr> <tr> <td>8</td> <td>Koperasi Sejahtera Tani</td> <td>Punti Kalo</td> </tr> <tr> <td>9</td> <td>Koperasi Tani Mandiri</td> <td>Kandang</td> </tr> </tbody> </table>	No	KUD	Village	1	Koperasi Tanjung Dani Sakti	Tuo Sumay	2	Koperasi Sumay Jaya	Tuo Sumay	3	Koperasi Sumber Usaha	Tuo Sumay	4	Koperasi Bina Tani	Sungai Rambai	5	Koperasi Belarik Jaya	Jati Belarik	6	Koperasi Sawit Tambara Jaya	Tambun Arang	7	Koperasi Tunas Harapan	Teluk Langkap	8	Koperasi Sejahtera Tani	Punti Kalo	9	Koperasi Tani Mandiri	Kandang	<p>Complied</p>
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		10	Koperasi Tanjung Jaya Bersama	Tuo Sumay		
		11	Koperasi Tanjung Aur Duri	Teriti		
		12	Koperasi Sawit Sumay Makmur	Pinang Belai		
		13	Koperasi Sawit Makmur	Sekutur Jaya		
		14	Koperasi Barokah	Teluk Kasai		
		15	Koperasi Sawit Keluarga Sejahtera	Bungo Tanjung		
		16	Koperasi Sawit Makmur Bersama	Bukit Pamuatan		
		17	Koperasi Sawit Karya Makmur	Napal Putih		
		18	Koperasi Sawit Tanduk Perkasa	Suko Makmur		
		<p>These 18 cooperatives are spread in 11 villages around the PT RAU's plantation (Desa Tuo Sumay, Desa Teriti, Desa Kandang, Desa Pinang Belai, Desa Sekutur Jaya, Desa Bukit Pamuatan, Desa Napal Putih, Desa Sako Makmur, Desa Bungo Tanjung, Desa Tambun Arang, Desa Jati Belarik), so that the oil palm farmers around the PT RAU plantation are members of the Plasma (Scheme smallholder). Guidance for plasma oil palm farmers is routinely carried out by PT RAU every year, including through:</p> <ul style="list-style-type: none"> - Training in Best Management Practises, OHS, HCV, Conservation and ISPO (Indonesian Sustainable Palm Oil) in April 2022. - Training of RSPO ISH on 23 May 2022. - Training of PPE on 27 April 2022. - Training of First Aid Kit on 23 May 2022. - Training of Basic Fire on 15 June 2022. - Training of limited pesticide on 15 June 2022. 				

		<p>- Training of Harvesting, IPM, Fertilizer, Weeding Control on 24 August 2022.</p> <p>For the Independent Smallholder</p> <p>During ASA1_1, audit team has conducted interview to the management and document review regarding the support from organization to the independent smallholders, obtained evidence that the organization has conducted assistance in measuring farmers' land around the Company with area 287 Ha for legality arrangements (increasing legality to SHM) in November 2022.</p> <p>In addition, the company has provided training regarding Best Management Practises, OHS, HCV for Independent Smallholders around the organization on 22 April 2022. Verified document such as note of meeting, attendance list and photo.</p>	
<p>5.2.3</p>	<p>Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.</p> <p>- Minor compliance -</p>	<p>During ASA1_1 has identified that Bungo Tebo Mill supplied by own estates (Bungo Tebo Estate), smallholder from 18 KUD's with total 5,914 Ha smallholders and third party's supplier. Based on interview with smallholder representatives from KUD Tanjung Dani Sakti, KUD Sumber Usaha, Koperasi Sawit Bina Tani, Koperasi Sawit Sumay Makmur, and Koperasi Barokah, obtain information that entire land has been granted by government (private land title/SHM).</p> <p>According to the signboard in mill's gate, Bungo Tebo Mill does not accept FFB from illegal sources (forest area or crop stolen). All FFB from third parties shall comply with regulation. Mill's staff told that FFB Purchasing Department has set the procedures for their supplier as follows:</p> <ul style="list-style-type: none"> • New supplier shall propose their FFB purchased offer including submitted the name and land legality of each potential farmer. • FFB Purchasing Department verify the geolocation of potential farmer that submitted by the third parties. 	<p>Complied</p>

		<ul style="list-style-type: none"> • New supplier shall sign the agreement which stated to not send illegal FFB sources. This agreement will automatically be cancelled if any violation on this clause. • The FFB transporter shall signed the zero illegal FFB statement letter in security gate in each delivery note. <p>Asian Agri's through his subsidiary PT. Inti Indosawit Subur fully supported their smallholder to be certified by ensuring all FFB come from legal sources and comply with national regulation. They also conducted good engagement to demonstrated best management practices in agronomy, environmental handling and safety procedures by placing a Plasma Supervisor and Assistant. For example, each plot received 4 unit barn owl box to help them control rat population, 1 unit barn owl to cover an area of 3 – 5 ha.</p> <p>During the audit, auditor also obtain information that PT. RAU are now assisting the smallholders on replanting project in collaborated with local government. This aims to ensure that farmers produce palm oil sustainably.</p> <p>For the Independent Smallholder, audit team has conducted interview to the management and document review regarding the support from organization to the independent smallholders, obtained evidence that the organization has conducted assistance in measuring farmer's land around the Company with area 287 Ha for legality arrangements (increasing legality to SHM) in November 2022.</p> <p>In addition, the company has provided training regarding Best Management Practises, OHS, HCV for Independent Smallholders around the organization on 22 April 2022. Verified document such as note of meeting, attendance list and photo.</p>	
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	During ASA1_1 has been verified that Certificate Holder has assigned chemical weeding team (Tim Unit Semprot-TUS) in each estate/unit to	Complied

	<p>- Critical (Major) compliance -</p>	<p>handling chemical weeding activity. The team member originated from own workers (for own estate) and local communities (for smallholder). They regularly attended training on pesticide handling that conducted by the pesticide supplier in collaboration with local pesticide committee.</p> <p>Based on document review and interview with random pesticide applicator known that they were attending the refresh training on pesticide handling on 19 May 2022 and 15 June 2022. Some topics that discuss such as safety pesticide handling, national regulation related to pesticide, symbol and label awareness and emergency procedure if any contamination or poisonous.</p> <p>During the audit, auditor also interviewed some smallholder representatives and obtain information that the company has provide training session on 15 June 2022 for them on how to be handling pesticide safely. For example, pesticide applicator shall use appropriate PPE during application, no smoke, avoid the direction of wind blows and cleaned their body after application to reduce contamination.</p>	
<p>5.2.5</p>	<p>The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.</p> <p>- Minor compliance -</p>	<p>There are 18 Koperasi as scheme smallholders at PT RAU, these 18 Koperasi are spread in 11 villages around the PT RAU's plantation (Desa Tuo Sumay, Desa Teriti, Desa Kandang, Desa Pinang Belai, Desa Sekutur Jaya, Desa Bukit Pamuatan, Desa Napal Putih, Desa Sako Makmur, Desa Bungo Tanjung, Desa Tambun Arang, Desa Jati Belarik), so that the oil palm farmers around the PT RAU plantation are members of the Plasma (Scheme smallholder). Guidance for plasma oil palm farmers is routinely carried out by PT RAU every year, including through:</p> <ul style="list-style-type: none"> - Training in Best Management Practises, OHS, HCV, Conservation and ISPO (Indonesian Sustainable Palm Oil) in April 2022. - Training of RSPO ISH on 23 May 2022. - Training of PPE on 27 April 2022. - Training of First Aid Kit on 23 May 2022. - Training of Basic Fire on 15 June 2022. 	<p>Choose an item.</p>

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		<ul style="list-style-type: none"> - Training of limited pesticide on 15 June 2022. - Training of Harvesting, IPM, Fertilizer, Weeding Control on 24 August 2022. <p>Based on the RSPO Time bound plan, all scheme smallholders under PT Inti Indosawit Subur Group have been certified. This also can be seen in social media of companies such as LinkedIn where they are informed about the scheme smallholder program.</p> <p>The company also has a Sustainability Report and audited against GRI Standard. The smallholder inclusion can be seen in the Sustainability Report pages 38 – 49.</p> <p>For the Independent Smallholder</p> <p>During ASA1_1, audit team has conducted interview to the management and document review regarding the support from organization to the independent smallholders, obtained evidence that the organization has conducted assistance in measuring farmers' land around the Company with area 287 Ha for legality arrangements (increasing legality to SHM) in November 2022.</p> <p>In addition, the company has provided training regarding Best Management Practises, OHS, HCV for Independent Smallholders around the organization on 22 April 2022. Verified document such as note of meeting, attendance list and photo.</p>	
<p>Principle 6: respect workers' rights and conditions Protect workers' rights and ensure safe and decent working conditions.</p>			
<p>Criteria 6.1: Any form of discrimination is prohibited.</p>			
<p>6.1.1</p>	<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</p>	<p>The company has Equal Opportunities policy "Kebijakan Perusahaan", dated 1st December 2019 stated: "To treat equal for all employee in term of recruitment, work performance, and representative without discrimination on race, caste, national origin, religion, disability, gender,</p>	<p>Complied</p>

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	<p>orientation, gender identity, union membership, political affiliation or age.</p> <p>- Critical (Major) compliance -</p>	<p>sexual orientation, union membership, political affiliation, or age". The company policy is available on notice board. Based on interviews with workers, during stakeholder consultation, it was noted that worker has a basic understanding of company policy related to code of ethical conduct. This mechanism has been socialized to all workers on 14-16 September 2022 and also to all stakeholder on 10-12 October 2022. In the 2023 period, PT RAU has re-socialized related to internal and external complaint procedures on 13-15 February 2023.</p> <p>Workers register for mill and estates mentioned that all workers came from different backgrounds (race, religion, gender, etc). Ethnic 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>This employee list 2022 period 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> <p>Data verified: List of Employee June 2022 "Daftar Karyawan" there were not found any evidence of discrimination and migrant workers:</p> <table border="1" data-bbox="1086 1013 1966 1093"> <thead> <tr> <th>MELAYU</th> <th>JAWA</th> <th>BATAK</th> <th>KERINCI</th> <th>NIAS</th> <th>MINANG</th> <th>FLORES</th> </tr> </thead> <tbody> <tr> <td>76,07%</td> <td>4,76%</td> <td>9,05%</td> <td>0,00%</td> <td>9,76%</td> <td>0,24%</td> <td>0,12%</td> </tr> </tbody> </table> <table border="1" data-bbox="1086 1149 1456 1348"> <thead> <tr> <th>Islam</th> <th>Christianity</th> </tr> </thead> <tbody> <tr> <td>81,67%</td> <td>18,33%</td> </tr> <tr> <th>Male</th> <th>Female</th> </tr> <tr> <td>55,5%</td> <td>44,5%</td> </tr> </tbody> </table>	MELAYU	JAWA	BATAK	KERINCI	NIAS	MINANG	FLORES	76,07%	4,76%	9,05%	0,00%	9,76%	0,24%	0,12%	Islam	Christianity	81,67%	18,33%	Male	Female	55,5%	44,5%	
MELAYU	JAWA	BATAK	KERINCI	NIAS	MINANG	FLORES																			
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		<p>Based on PT RAU's labor data for the June 2022 period, PT RAU does not discriminate and provides opportunities for all workers to get the right to work. Based on interviews with several workers (5 female spray workers and 4 male harvesters) and also interviews with the Head of the Trade Union T.J. Purba, that there are no discriminatory practices within PT RAU.</p> <p>Scheme smallholder:</p> <p>The scheme smallholder has set a policy for each cooperative. This Cooperative Policy has established policies related to:</p> <ul style="list-style-type: none"> - Fulfilments of legal requirements that apply in the implementation of activities in cooperatives. - Ethical conduct in doing business in all business transactions and operations. - Respect human rights by treating all KUD employees and farmers fairly. - Forbid minors to work in every activity. - Prevent sexual harassment and various forms of violence against women. - Respect every KUD employee or farmer to form or become a member of a trade union and ensure the confidentiality of the reporter (Whistle-blower). - Respect human rights defenders (HRD) without giving threats and intimidation. - Do not provide work under threats, sanctions or penalties where workers do not have the freedom to agree to the implementation of the work. <p>Based on observations in the offices of each KUD, policies related to discrimination and giving opportunities to all farmers and workers can be found in the KUD office room in the form of sign boards that can be seen by the public.</p>	
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<p>6.1.2</p>	<p>(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against. Evidence includes migrant workers non-payment of recruitment fees.</p> <p>- Critical (Major) compliance -</p>	<p>Bungo Tebo POM, Estate and Scheme Smallholder:</p> <p>The worker registers for mill and estates mentioned that all workers came from different backgrounds (race, religion, gender, etc). Ethnical diversity of workers and during interviews with workers, no discrimination was identified based on religion, ethnicity, gender. No evidence of discrimination was found during the audit.</p> <p>The company provided working tools to the workers, relevant to the nature of the work performed.</p> <p>Based on interviews with several workers during this audit, it was stated by the workers that PT RAU had treated its employees fairly or there was no discrimination and there were no fees charged at the time of employee recruitment.</p>	<p>Complied</p>
<p>6.1.3</p>	<p>The unit of certification demonstrates that the recruitment selection, hiring access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p> <p>- Minor compliance -</p>	<p>Bungo Tebo POM, Estate and Scheme Smallholder:</p> <p>The company has an SOP related to new employment recruitment. According on SOP Rekrutment dan Seleksi Karyawan No. SOP: AA-HR-305.2-R0 dated 1 February 2009 regarding "Penerimaan Karyawan Baru" (Recruitment and Selection of Employee), the company will accept new employee based on their capabilities and qualifications. This procedure were communicated to all employees in the workplace and stakeholders as well in November 2019.</p> <p>There are two types of employees that are applied in PT RAU, which are permanent employees (known as SKU-B and SKU-H) and daily workers (known as BHL/PHL). The worker register for mill and estates mentioned that all workers came from different backgrounds (race, religion, gender, etc). Ethnical diversity of workers and during interviews with workers, no discrimination was identified based on religion, ethnicity, gender. No evidence of discrimination was found during the audit.</p> <p>Fixed Employee (SKU-H and SKU-B) is confirmed under the joint work Agreement (PKB), while the Daily worker with the daily work agreement with a minimum validity period of 1 year.</p>	<p>Complied</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 the monthly salary.</p> <p>In the 2021 period, there are no recruitments in the Bungo Tebo Estate, only at the Bungo Tebo Mill there are one worker recruitments. Taken example of recruitment at Bungo Tebo Mill on period 2022:</p> <ul style="list-style-type: none"> - In the 2022 period there was not much recruitment of workers, although there was still recruitment at Bungo Tebo Mill. Recruitment process as follows: Recruitment of workers for the position of workshop mechanic on behalf of Dimas Adi Juanda. Along with the required documents including: KTP, Family Card, copy of S1 diploma and transcript. The interview process was held on 19 December 2022 and Medical Check-up by the PT Rigunas Agri Utama Clinic on 24 February 2023 and declared healthy to carry out the intended work. - Promotions are carried out based on employee performance appraisals for 3 months which can then be submitted for promotion as (from non-permanent employees to permanent workers or permanent workers for promotion). Promotion of Bungo Tebo Estate employees is carried out in accordance with procedures, namely through an evaluation process of performance and length of working period. Promotion of daily workers to permanent workers in the 2022 period, a total of 29 workers (in detail please see indicator 3.5.2). 	
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		<table border="1"> <tr> <td colspan="3">Promotion to Permanent worker on 2022 period:</td> </tr> <tr> <td>Harvesting Foreman</td> <td>1</td> <td>Worker</td> </tr> <tr> <td>Harvester</td> <td>19</td> <td>Workers</td> </tr> <tr> <td>Security</td> <td>3</td> <td>Workers</td> </tr> <tr> <td>FFB Loader</td> <td>6</td> <td>Workers</td> </tr> <tr> <td>Total</td> <td>29</td> <td>Workers</td> </tr> </table> <p>- Promotion of 2 daily workers at Bungo Tebo Mill and 10 other daily workers have been proposed to be promoted to permanent workers, as follows:</p> <table border="1"> <tr> <td colspan="5">Realization of Employee Promotion on 2022 Period</td> </tr> <tr> <td colspan="5">Daily Workers (PHL) to Permanent Workers (SKU) on Bungo Tebo Mill</td> </tr> <tr> <th>No.</th> <th>Number of Memorandum</th> <th>Date</th> <th>Workers Name</th> <th>Position</th> </tr> <tr> <td>1</td> <td>0277/HR-RO3/MEMO/SK-PB/09/2022</td> <td>06-Oct-22</td> <td>Longgo Situmeang</td> <td>Kernel Operator</td> </tr> <tr> <td>2</td> <td>0423/HR-RO3/MEMO/SK/09/2022</td> <td>22-Dec-21</td> <td>Antoni Ramanda</td> <td>sorting workers</td> </tr> </table> <p>Proposed promotion of 10 daily worker employees to permanent workers. Proposed by Bungo Tebo Mill Manager to HRD Manager Plt. III through Memorandum No. 152/RAU-PBT/MEMO/11/2022 dated 11 November as much as 10 workers, includes:</p> <ol style="list-style-type: none"> 1. Awaludin position as KCP Operator Helper 2. Ebet Enjer Immanuel position as Tipler Station Operator Helper 3. Joko Sutejo position as Mechanic 4. Iswandi position as Mechanic 5. Samsul position as Mechanic 6. Muslim position as Sortage officer 7. Ahmad Nur Islam position as Tipler Station Operator Helper 8. Deni Firmansyah position as Sortage officer 9. Abdullah position as Cleaning Service 10. James Fernando N. Butar Butar position as Warehouse Officer <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</p>	Promotion to Permanent worker on 2022 period:			Harvesting Foreman	1	Worker	Harvester	19	Workers	Security	3	Workers	FFB Loader	6	Workers	Total	29	Workers	Realization of Employee Promotion on 2022 Period					Daily Workers (PHL) to Permanent Workers (SKU) on Bungo Tebo Mill					No.	Number of Memorandum	Date	Workers Name	Position	1	0277/HR-RO3/MEMO/SK-PB/09/2022	06-Oct-22	Longgo Situmeang	Kernel Operator	2	0423/HR-RO3/MEMO/SK/09/2022	22-Dec-21	Antoni Ramanda	sorting workers	
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		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.	
6.1.4	<p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p> <p>- Minor compliance -</p>	<p>Pregnancy checks at PT RAU are carried out for female workers (especially jobs related to chemicals). This examination was carried out on November 4, 2022, for 87 female workers. From the results of the examination, there were no female workers who were pregnant. Based on interviews with nurses and female workers, pregnancy testing is applicable to all female workers without discrimination. So, if there are female workers who are pregnant, the management of PT RAU will transfer their work to jobs that do not pose a risk to pregnancy, for example maintaining plants that are not in contact with chemicals. In addition, if there are female workers who are nearing their due date, they are given 3 months of maternity leave.</p> <p>There is a gender committee actively meets and discuss general agenda and other issue related to handling sexual harassment, dissemination of sexual harassment prevention.</p> <p>Based on interview with management representatives, the 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.</p>	Complied
6.1.5	<p>(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>- Critical (Major) compliance -</p>	<p>PT Rigunas Agri Utama has formed a Gender Committee at Bungo Tebo Estate and Mill. Based on the Gender Committee Organizational Structure was stated on 13 March 2022. Gender committees consisting of representatives of all units in the Tungkal Ulu Group play a role in: addressing issues related to women's rights and counselling for women workers who experience acts of violence and sexual harassment and other issues related to women workers.</p> <p>In 2022 Gender Committee Work Program has been established including</p>	Complied

		<p>the issues that will be discussed at the meeting, including:</p> <ul style="list-style-type: none"> - Improving maternal and child health through Posyandu (integrated service post), immunization and vitamin supplement activities. - Conduct regular gender committee meetings at least every 4 months - Provision of supplementary food (during Posyandu) - Sports activities for employees - Environmental cleanliness in residential areas - Assessment of healthy housing for employees - Religious activity <p>The regular monthly gender committee meeting was held on 13 March 2022 which discussed the protection of the rights of women workers from the company, the meeting was attended by 8 representatives of women workers from each affair (a list of attendance can be shown at the time of the audit). Based on the records of the routine meeting and interviews with management, that during the period 2022 there were no cases related to women workers.</p>	
6.1.6	<p>There is evidence of equal pay for the same work scope.</p> <ul style="list-style-type: none"> - Minor compliance - 	<p>PT RAU has set wage standards based on the Decree of the Governor of Jambi Province. In the 2022 period, the wages of workers at PT RAU use Governor's Decree No. 1056/KEP.GUB/DISNAKERTRANS-3.3/32021 dated 16 December 2021 concerning the Minimum Wages for the Jambi Province of IDR 2,698,940.87 per month or IDR 107,957.63.</p> <p>Meanwhile, the latest wage determination for the 2023 period is using the Decree of the Governor of Jambi Province No. 1047/Kep.Gub/Disnakertrans-3.3/2022 dated 28 November 2022 concerning the Determination of the Jambi Province Minimum Wage (UMP: Upah Minimum Provinsi) for 2023 of IDR 2,943,033.08 per month or IDR 117,721.32 which took effect on 1 January 2023.</p> <p>This decree is presented in Indonesian and delivered to all workers during morning meeting and through the PUK-SPPP-SPSI Workers' Union, then</p>	Complied

		<p>the trade union conveys it to workers at the regular trade union meeting so that all workers understand the wages that must be received.</p> <p>At the time of this surveillance audit, PT RAU was still making wage adjustments in the SAP Checkroll application, so that wage determination for the 2023 period would be carried out "<i>Rapel</i>" in March-April 2023. For this reason, re-verification will be carried out at the next audit visit. Several wage documents (salary slips and payroll) have been verified in this surveillance audit (presented in the next indicator 6.2.1).</p>	
<p>Criteria 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).</p>			
<p>6.2.1</p>	<p>(C) Documentation of pay and working conditions in accordance with applicable labour laws are available to the workers in national languages and explained to them in language they understand.</p> <p>- Critical (Major) compliance -</p>	<p>PT RAU has set wage standards based on the Decree of the Governor of Jambi Province. In the 2022 period, the wages of workers at PT RAU use Governor's Decree No. 1056/KEP.GUB/DISNAKERTRANS-3.3/32021 dated 16 December 2021 concerning the Minimum Wages for the Jambi Province of IDR 2,698,940.87 per month or IDR 107,957.63.</p> <p>Meanwhile, the latest wage determination for the 2023 period is using the Decree of the Governor of Jambi Province No. 1047/Kep.Gub/Disnakertrans-3.3/2022 dated 28 November 2022 concerning the Determination of the Jambi Province Minimum Wage (UMP: Upah Minimum Provinsi) for 2023 of IDR 2,943,033.08 per month or IDR 117,721.32 which took effect on 1 January 2023. PT RAU melalui Reginal Head Plt.3 menerbitkan Memorandum No. 001/HR-RO3/MEMO/05/2022 tanggal 5 Mei 2022 tentang Upah Pekerja Tahun 2022. This memorandum is presented in Indonesian and delivered to all workers through the PUK-SPPP-SPSI Workers' Union, then the trade union conveys it to workers at the regular trade union meeting on November 25, 2022 so that all workers understand the wages that must be received.</p> <p>At the time of this surveillance audit, PT RAU was still making wage adjustments in the SAP Checkroll/Payroll application, so that wage determination for the 2023 period would be carried out "<i>Rapel</i>" in March-May 2023. For this reason, re-verification will be carried out at the next</p>	<p>Complied</p>

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		<p>audit visit. Payroll/checkroll and employee salary slips are presented in Indonesian which can be understood by workers.</p> <p>The following is a sample salary slip for the January 2023 period (still using the 2022 UMP) and the Rapel will be carried out in March-April 2023, as follows:</p> <ul style="list-style-type: none"> - Employee namely Sa*** (daily worker/PHL) in Bungo Tebo Estate period January 2023, 20 working days; Basic Salary: IDR 2,159,160 (@ IDR 107,958 per day), premium: IDR 1,018,664, deduction (incl. Jamsostek, BPJS Kesehatan and Pension): IDR 110,399. Net Salary: IDR 3,067,425. - Employee namely Za***** (daily worker/PHL) in Bungo Tebo Estate period January 2023, 20 working days; Basic Salary: IDR 2,159,160 (@ IDR 107,958 per day), premium: IDR 1,154,580, deduction (incl. Jamsostek, BPJS Kesehatan and Pension): IDR 110,399. Net Salary: IDR 3,203,341. - Employee namely Ek***** (daily worker/PHL) in Bungo Tebo Mill period January 2023, 19 working days; Basic Salary: IDR 2,051,202 (@ IDR 107,958 per day), premium: IDR 15,245, over time: IDR 842.448, deduction (incl. Jamsostek, BPJS Kesehatan and Pension): IDR 110,400. Net Salary: IDR 2,798,495. - Employee namely Ang***** (daily worker/PHL) in Bungo Tebo Mill period January 2023, 16 working days; Basic Salary: IDR 1,727,328 (@ IDR 107,958 per day), premium: IDR 14,443, over time: IDR 1,591,292, deduction (incl. Jamsostek, BPJS Kesehatan and Pension): IDR 83,410. Net Salary: IDR 3,249,653. <p>Due to the determination of wages for the 2023 period has not been implemented and according to an explanation from the management of PT RAU that Rapel will be carried out in May 2023, the verification of wages for the 2023 period will be carried out in the next audit. However, based on a review of documents (payslip and payroll) the determination</p>	
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		<p>of wages for the 2022 and previous periods is in accordance with applicable government regulations.</p> <p>Scheme smallholders:</p> <p>The Bungo Tebo Plasma Plantation has documented remuneration for each Cooperative through a Rekap Gaji Pengurus dan Karyawan Koperasi periode Januari – Desember 2022, sample wage documents are taken:</p> <ul style="list-style-type: none"> • Salary list for Management and Employees of Sumber Usaha Cooperative; on behalf of employee Indah Parwati (employee for bookkeeping administration) the salary for the December 2022 period is IDR 2,858,000, consisting of (basic salary IDR 1,775,000, Position Benefits IDR 605,000, Health Benefits IDR 238,000 and Family Benefits IDR 240,000) for 5 working hours per day (08.00 – 14.00). • Salary list for Management and Employees of Sumber Usaha Cooperative; on behalf of employee M. Amahdi (Employees transporting FFB) salary for the December 2022 period of IDR 2,838,000, consisting of (basic salary IDR 1,775,000, Position Benefits IDR 597,000, Health Benefits IDR 233,000 and Family Benefits IDR 233,000) for working hours during 5 hours per day (08.00 – 14.00). 	
6.2.2	<p>(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed.</p> <p>- Critical (Major) compliance -</p>	<p>Employment contract are available in Joint Working Agreement (PKB: <i>Perjanjian Kerja Bersama</i> 2022- 2023 period) and the daily labour contract agreement. The document are detailing payments and condition of employment. Pay and condition are in accordance with UU No, 13 year 2003, UU No. 11 year 2021; UU Cipta Kerja dan Decree of Governor of Jambi related to Minimum Wage 2022 period.</p> <p><u>Related to PKB BKS-PPS:</u></p> <p>Based on the Letter of the Direktorat Jenderal Pembinaan Hubungan Industrial dan Jaminan Sosial Tenaga Kerja Kementerian Ketenagakerjaan</p>	Complied

		<p>RI Number B. 319/PHIJSK/x/2018 dated 26 October 2018 Regarding the Explanation of the Application for Registration of PKB Year 2018-2020 between BKS-PPS and PP.FSP PP-SPSI States that:</p> <ol style="list-style-type: none"> 1. BKS-PPS or the Federation are not authorized as parties to sign and register the Collective Labor Agreement (PKB). 2. Understand the proof of receipt from the Ministry of Manpower of the Republic of Indonesia on September 13, 2022 in your application letter (PKB BKSPPS with PP.FSP.PP-SPSI Year 2022-2023) that there is no Decree of the Director General of Labor Relations and Wages regarding Registration of Cooperation Agreements (PKB) BKS-PPS with PP.FSP.PP-SPSI Year 2022-2023 in the ePPPKB application (Source: Admin ePPPKB Riau Province) as a valid work requirement document for use in companies. 3. The BKS-PPS Collective Labor Agreement (PKB) with PP.FSP.PP-SPSI for 2022-2023 cannot be used as a valid and legal Industrial Relations Facility document so it cannot be used as a guideline. 4. Following up on the above, all companies that are members of the Sumatran Plantation Company Cooperation Agency (BKS-PPS) should immediately draw up a Collective Labor Agreement for the sake of protecting employment for workers/laborers in each company. <p>Furthermore, the Ministry of Manpower of the Republic of Indonesia, the Director General of Development of Industrial Relations and Labor Social Security through Letter No. 4/58/HI.00.00/II/2023 dated 23 February 2023 concerning the BKS-PPS PKB Discussion Meeting, stated that the status of the BKS-PPS PKB above would be subject to further discussion with the meeting leaders by the Director of Labor Relations and Wages.</p> <p>Thus, up to this surveillance, the status of the PKB BKS-PPS is still awaiting the results of the discussion meeting from the Direktorat Jenderal Pembinaan Hubungan Industrial dan Jaminan Sosial Tenaga Kerja Kementerian Ketenagakerjaan RI.</p>	
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		<p>However, the proposed draft of the PKB BKS-PPS for the 2022-2023 period has explained wages in detail (including benefits and other benefit), working hours including overtime and working days have been regulated in the PKB Period 2018-2020 in Article V; Upah - Wages, which explains:</p> <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>Detailing on holidays and leave (sick leave, maternity leave and menstruation leave), reason for dismissal, period notice have been regulated in Article VIII of PKB.</p> <p>The following is a sample salary slip for the January 2023 period (still using the 2022 UMP) and the Rapel will be carried out in March-April 2023, as follows:</p> <ul style="list-style-type: none"> - Employee namely Sa*** (daily worker/PHL) in Bungo Tebo Estate period January 2023, 20 working days; Basic Salary: IDR 2,159,160 (@ IDR 107,958 per day), premium: IDR 1,018,664, deduction (incl. Jamsostek, BPJS Kesehatan and Pension): IDR 110,399. Net Salary: IDR 3,067,425. - Employee namely Za***** (daily worker/PHL) in Bungo Tebo Estate period January 2023, 20 working days; Basic Salary: IDR 2,159,160 (@ IDR 107,958 per day), premium: IDR 1,154,580, deduction (incl. Jamsostek, BPJS Kesehatan and Pension): IDR 110,399. Net Salary: IDR 3,203,341. - Employee namely Ek***** (daily worker/PHL) in Bungo Tebo Mill 	
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		<p>period January 2023, 19 working days; Basic Salary: IDR 2,051,202 (@ IDR 107,958 per day), premium: IDR 15,245, over time: IDR 842.448, deduction (incl. Jamsostek, BPJS Kesehatan and Pension): IDR 110,400. Net Salary: IDR 2,798,495.</p> <ul style="list-style-type: none"> - Employee namely Ang***** (daily worker/PHL) in Bungo Tebo Mill period January 2023, 16 working days; Basic Salary: IDR 1,727,328 (@ IDR 107,958 per day), premium: IDR 14,443, over time: IDR 1,591,292, deduction (incl. Jamsostek, BPJS Kesehatan and Pension): IDR 83,410. Net Salary: IDR 3,249,653. <p>Based on the salary slip sample above, that PT RAU has displayed in detail the components of wages in accordance with the regulations regarding wages; Peraturan Pemerintah no. 36 of 2021 concerning wages and UU no. 11 of 2021 concerning Undang-Undang Cipta Kerja.</p> <p>Scheme smallholders: Work contract agreement between cooperative and staff available in "Perjanjian dan Pengangkatan Karyawan Tetap KOPERASI", e.g:</p> <ul style="list-style-type: none"> - Koperasi Sawit Sumay Makmur – Surat Perjanjian Kerja No 03/SPK/KUD- SSM/IV/2019 tentang Perjanjian dan Pengangkatan Karyawan Tetap KOPERASI Sawit Sumay Makmur, namely Damanhuri (Sekertaris KOPERASI Sawit Sumay Makmur), dated 1 April 2019. - Koperasi Sawit Makmur – Surat Perjanjian Kerja No 03/SK/KUD-SM/I/2019 tentang Perjanjian dan Pengangkatan Karyawan Tetap KOPERASI Sawit Makmur, namely Rahmat (Bendahara KOPERASI Sawit Makmur), dated 1 January 2019. - Koperasi Belarik Jaya – Surat Perjanjian Kerja No 03/SK/KUD-BJ/II/2019 tentang Perjanjian dan Pengangkatan Karyawan Tetap Koperasi Belarik Jaya, namely Khamsiyah (Bendahara Koperasi Belarik Jaya), dated 1 January 2019. - Koperasi Sawit Tambara Jaya – Surat Perjanjian Kerja No 016/SK/KUD- STJ/IV/2018 tentang Perjanjian dan Pengangkatan 	
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		<p>Karyawan Tetap Koperasi Sawit Tambara Jaya, namely Yadi Efendi (Bendahara Koperasi Sawit Tambara Jaya), dated 1 April 2019.</p> <p>Inside the work contract agreement covers detailing of pay and condition such as: employment status and task, salary, employee obligation, sanction, work termination, dispute settlement, and additional regulation. Contract is made available in Bahasa Indonesia and understood by both parties. The work contract agreement are in accordance with Law no. 11 in 2021; UU Cipta Kerjadan Decree of Governor of Jambi related to Minimum Wage 2022 period.</p>	
<p>6.2.3</p>	<p>(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, and other legal labour requirements.</p> <p>- Critical (Major) compliance -</p>	<p>The company has set employment provisions in accordance with the rules and legal requirements. 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 (Governor's Decree No. 1056/KEP.GUB/DISNAKERTRANS-3.3/32021 dated 16 December 2021 concerning the Minimum Wages for the Jambi Province of IDR 2,698,940.87 per month or IDR 107,957.63.) effective in January 2022.</p> <p>Determination of wages (including benefits), working hours (including hours and overtime pay) and working days have been regulated in the PKB Period 2022-2023 in Article V; Upah - Wages, which explains:</p> <ul style="list-style-type: none"> a) Permanent workers are given wages, the value of which is determined by the employer on the condition that it is not lower than government regulations. b) Certain permanent workers are given wages (Basic Salary and Rice) in accordance with the status of the group/level whose value is determined by the employer with provisions not lower than government regulations c) Permanent workers receive additional wages (UMP / UMSK) and / or attendance incentives as stipulated further in separate provisions. 	<p>Complied</p>

		<p>Rice allowance is: 9 kg and each anal (maximum 3 children) is given 7.5 kg per month, which consists of the basic salary and rice allowance. Rice supply is given once a month. Rice supply is intended to be of good quality and is considered appropriate for the health of the Worker and the gift is linked to attendance.</p> <p>Provisions on holidays and leave (both maternity leave and menstruation leave) have been regulated in Article VIII regarding Non-working Days; including: absenteeism, rest days of the week, official holidays, annual leave, maternity leave and others.</p> <p>Provisions related to manpower have fulfilled the laws and regulations namely Law no. 11 in 2021; UU Cipta Kerja dan Decree of Governor of Jambi related to Minimum Wage 2022 period.</p>	
<p>6.2.4</p>	<p>(C) The unit of certification provides adequate housing. Sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure. - Critical (Major) compliance -</p>	<p>Bungo Tebo POM and Estate: PT Rigunas Agri Utama has provided facility for employee as in "Inventarisasi Bangunan dan Infrastruktur", updated in July 2018, such as:</p> <ol style="list-style-type: none"> 1. Kantor afdeling (4 units) 2. Guest house (2 units) 3. Staff housing (5 units) 4. Poliklinik (1 unit): 5. Masjid/Mosque (3 units) 6. Balai Karyawan (3 units) 7. Koperasi (1 unit) 8. D2 type employee housing (38 units); 9. E4 type employee housing (216 units); 10. E1 employee housing of 85 units; 11. Mill worker housing of 84 units; 12. School buses (4 units) 	<p>Complied</p>

		<p>13. Sport facilities.</p> <p>Permit for company clinic: "Surat Kantor Penanaman Modal Daerah dan Pelayanan Perizinan Terpadu tentang Surat Izin Penyelenggaraan Klinik Rawat Jalan Pelayanan Medik Dasar No.445/01/SIK/KPMD-PPT/2015 untuk PT. Rigunas Agri Utama, responsible by dr. Arde Hidayat", dated 16 February 2020 and valid for 5 years.</p> <p>The clinic at PT RAU's plantation already has a doctor on behalf of dr. Yudi Chandra who already has "Surat Izin Praktek Dokter No.446/048/DU/DPM-PTSP-K.UKM/2019 on behalf of dr. Yudi Chandra" dated 2 August 2019 and valid until 30 March 2024.</p> <p>Housing for worker was adequate. Housing compound was completed with electricity and clean water (from bore well). During visit, the condition of housing was relatively good, although the awareness to dispose of waste according to procedures should be further increased. PT RAU has checked the clean water laboratory by PT Itec Solution Indonesia on 20 April 2022 based on Permenkes No. 492/MENKES/Per/IV/2010 with the results of clean water quality in accordance with quality standards.</p> <p>Scheme smallholders</p> <p>Workers that worked in scheme smallholder plantation area lived in their villages. Clean water need has been fulfilled through water well and buying gallon water.</p>	
6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p>Bungo Tebo POM and Estate:</p> <p>PT RAU has made efforts in terms of providing convenience facilities to get access to food needs and the daily needs of its employees in the form of the establishment of the Jaya Abadi Employee Cooperative which provides basic needs. The company also provides facilities for employees to go to the nearest market by car once a week.</p> <p>Based on interviews with the head of the trade union and the chair of the gender committee that the company has facilitated easy access to food and daily necessities and so far there have been no difficulties.</p>	Complied

		<p>Scheme smallholders: Scheme smallholder lives in the villages surrounding the plantation. The basic need for farmers can be accesses easily, since these worker lives outside the plantation.</p>	
6.2.6	<p>A DLW is paid to all workers in accordance with applicable regulations, including workers who work on a piece rate/quota basis, the calculation of which is based on a quota that can be achieved during regular working hours.</p> <p>- Minor compliance -</p>	<p>Bungo Tebo POM, Estate and Smallholder: Company has had state about the wages for workers base on Decree of Gubernur of Jambi SK no. 883/KEP.GUB/DISNAKERTRANS-3.3/2020, dated 2 November 2020; regarding: "Penetapan Upah Minimum Provinsi Jambi Tahun 2021" amount of IDR 2,630,162.13 per month.</p> <p>The Company has already set wage standard based on wages set by the government recorded on Memorandum no. 001/HR-R03/ MEMO/01/2023, dated 09 January 2022; regarding: "Upah Pekerja Golongan SKUB" and also the determination of the daily wage for BHL (Daily workers) and PKWT employees (certain time workers). On this memorandum is also determine regarding structure of wage for each level worker (SKU-B). The company is also gives a scripts/slip salary to employees before salary is given, salary slip also contains basic salary, allowances, premium, labor health coverage (BPJS Tenaga kerja and Kesehatan) and deduction.</p>	Complied

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Pay Scale Structure							
Employment - SKUB							
PT. RIGUNAS AGRIS UTAMA - BUNGO TEBO							
Period 2023							
Job Class	Salary (IDR)	Job Class	Salary (IDR)	Job Class	Salary (IDR)	Job Class	Salary (IDR)
G1	2.698.940,87	F1	2.778.940,87	E1	2.858.940,87	D1	2.938.940,87
G2	2.708.940,87	F2	2.788.940,87	E2	2.868.940,87	D2	2.948.940,87
G3	2.718.940,87	F3	2.798.940,87	E3	2.878.940,87	D2	2.959.940,87
G4	2.728.940,87	F4	2.808.940,87	E4	2.888.940,87	D3	2.958.940,87
G5	2.738.940,87	F5	2.818.940,87	E4	2.899.940,87	D4	2.968.940,87
G6	2.748.940,87	F6	2.828.940,87	E5	2.898.940,87	D5	2.978.940,87
G7	2.758.940,87	F7	2.838.940,87	E6	2.908.940,87	D6	2.988.940,87
G8	2.768.940,87	F8	2.848.940,87	E7	2.918.940,87	D7	2.998.940,87
Job Class	Salary (IDR)	Job Class	Salary (IDR)	Job Class	Salary (IDR)		
C1	3.018.940,87	B1	3.098.940,87	A1	3.178.940,87		
C2	3.028.940,87	B2	3.108.940,87	A2	3.188.940,87		
C3	3.038.940,87	B3	3.118.940,87	A3	3.198.940,87		
C4	3.048.940,87	B4	3.128.940,87	A4	3.208.940,87		
C5	3.058.940,87	B5	3.138.940,87	A5	3.218.940,87		
C6	3.068.940,87	B6	3.148.940,87	A6	3.228.940,87		
C7	3.078.940,87	B7	3.158.940,87	A7	3.238.940,87		
C8	3.088.940,87	B8	3.168.940,87	A8	3.248.940,87		

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:

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Calculation Supporting Data Prevailing Wage (RSPO)						
Actual 2022						
Deskripsi	Sat.	Unit			Total	Remarks
		KLO	KBT	PBT		
Number of employees		19	839	113	IDR 971	
SKU	Orang	19	184	84	287	Number of worker of SKU (B, H) per Dec 2022
PHL	Orang	-	655	29	684	Number of worker of PHL per Dec 2022
Salary		IDR 881.682.219	IDR 1.769.833.346	IDR 3.742.681.116	IDR 6.394.196.681	
SKU	IDR	IDR 820.928.459	IDR 724.431.876	IDR 2.803.446.516	IDR 4.348.806.851	Total realization of SKU basic salary until Dec 2022 (without
PHL	IDR	IDR 60.753.760	IDR 1.045.401.470	IDR 939.234.600	IDR 2.045.389.830	Total realization of SKU basic salary until Dec 2022 (without
Rice		IDR 67.839.061	IDR 6.029	IDR 322.434.720	IDR 390.279.810	
SKU	IDR	IDR 67.839.061	IDR 6.029	IDR 322.434.720	IDR 390.279.810	Price of rice SKU (B, H) until Dec 2022
PHL	IDR	IDR -	IDR -	IDR -	IDR -	PHL rice costs until Dec 2022 (if any)
Other allowances		IDR 193.739.353	IDR 1.941.673.899	IDR 793.290.319	IDR 2.928.703.571	
Bonus	IDR	IDR 108.341.352	IDR 672.577.408	IDR 219.481.278	IDR 1.000.400.038	Bonus realization 2022 period\
THR (Holiday allowance)	IDR	IDR 61.713.058	IDR 1.235.536.491	IDR 318.132.052	IDR 1.615.381.601	THR realization on 2022
Manisan karyawan	IDR	IDR 2.022.534	IDR -	IDR 7.067.632	IDR 9.090.166	Realisasi manisan karyawan 2022
Electricity (Token)	IDR	IDR 5.280.000	IDR 33.560.000	IDR -	IDR 38.840.000	Actual token fee until Dec 2022
Electricity (Generator)	IDR	IDR -	IDR -	IDR 165.195.813	IDR 165.195.813	Realization of genset costs until Dec 2022 (factory allocation)
Clean water	IDR	IDR 16.382.409	IDR -	IDR 5.913.544	IDR 22.295.953	Waterpump cost until Dec 2022 (factory allocation)
School transportation	IDR	IDR -	IDR -	IDR 77.500.000	IDR 77.500.000	Total cost of school buses until Dec 2022
Employee Facilities						
Number of Houses	Unit	11	347	79	IDR 437	
House Building Costs	IDR				IDR -	The total cost of building the entire house in units
Building Maintenance Costs		IDR 1.572.791	IDR 221.320.201	IDR 43.537.607	IDR 266.430.599	
Housing	IDR	IDR 1.572.791	IDR 201.398.317	IDR 43.537.607	IDR 246.508.715	Realization up to Dec 2022
School	IDR		IDR 1.681.850		IDR 1.681.850	Realization up to Dec 2022
TPA (Child Care Center)	IDR		IDR 5.646.787		IDR 5.646.787	Realization up to Dec 2022
Sports facilities	IDR		IDR 8.456.021		IDR 8.456.021	Realization up to Dec 2022
Clinic carae	IDR		IDR 4.137.226		IDR 4.137.226	Realization up to Dec 2022
Others		-	3	-	IDR 3	
Scholarship	IDR		-		IDR -	Unit-covered scholarships such as YSG
wage of babysster	IDR		3		IDR 3	Wages of all babysitters until Dec 2022
Costs for school accreditation	IDR		-		IDR -	Costs for school accreditation, training, etc. that are not borne by the government

PROCEDURAL NOTE:

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

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

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

Once the DLW benchmark is available, this procedural note is no longer applicable.

<p>6.2.7</p>	<p>Permanent fulltime employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.</p> <p>- Minor compliance -</p>	<p>There are 2 types of employees at PT RAU, namely Permanent Workers (SKUH and SKUB) and non-permanent workers (PHL: Pekerja harian Lepas - Casual Daily Workers). Based on the list of PT RAU employees as of February 2023, theas follows:</p> <p><u>Bungo Tebo Estate:</u></p> <p>In the 2022 period there were 19 harvesters who had been proposed and approved through SK or Memorandum 0234-0259/HR-RO3/MEMO/SK/09/2022 dated 23 September 2022, on behalf of harvesters as follows:</p> <table border="1" data-bbox="1093 954 1644 1267"> <thead> <tr> <th>No.</th> <th>Employee Names</th> <th>No</th> <th>Employee Names</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Buang Zainul</td> <td>11</td> <td>Hariri Siregar</td> </tr> <tr> <td>2</td> <td>Idaman Ismail</td> <td>12</td> <td>Pilipus Gohae</td> </tr> <tr> <td>3</td> <td>Muhamad Sudarno</td> <td>13</td> <td>Hadri</td> </tr> <tr> <td>4</td> <td>Bangin</td> <td>14</td> <td>Eko Riadi</td> </tr> <tr> <td>5</td> <td>Heri Mustapa</td> <td>15</td> <td>Syargawi</td> </tr> <tr> <td>6</td> <td>Guswandi</td> <td>16</td> <td>Elmon Risman</td> </tr> <tr> <td>7</td> <td>Febrianto</td> <td>17</td> <td>Arsenius Lase</td> </tr> <tr> <td>8</td> <td>Saprani</td> <td>18</td> <td>Rahman Manulang</td> </tr> <tr> <td>9</td> <td>Nur Irawan</td> <td>19</td> <td>Herman Harefa</td> </tr> <tr> <td>10</td> <td>Yaiamanozatulo Wau</td> <td></td> <td></td> </tr> </tbody> </table> <p>Until 2025 there are 2,490 Ha of Mature Plants (TM), with a ratio of workers per Ha of 0.06 HK per Ha, so that the need for harvesters up to 2025 is (0.06 X 2,490) as many as 149 harvesters consisting of 69</p>	No.	Employee Names	No	Employee Names	1	Buang Zainul	11	Hariri Siregar	2	Idaman Ismail	12	Pilipus Gohae	3	Muhamad Sudarno	13	Hadri	4	Bangin	14	Eko Riadi	5	Heri Mustapa	15	Syargawi	6	Guswandi	16	Elmon Risman	7	Febrianto	17	Arsenius Lase	8	Saprani	18	Rahman Manulang	9	Nur Irawan	19	Herman Harefa	10	Yaiamanozatulo Wau			<p>Complied</p>
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harvesters with SKU status and 80 harvesters with PHL status. So up to February 2023, there are still 80 harvesters with PHL status.

Furthermore, Bungo Tebo Estate made a Promotional Program for PHL to SKU for 3 years (2023 – 2025) and this program was recognized by the Jambi Province Manpower and Transmigration Office cq. Head of Industrial Relations and Work Requirements Division, as follows:

- 2023 period; it will be proposed to promote PHL – SKU employees of 28 employees
- 2024 period; it will be proposed to promote PHL – SKU employees of 28 employees
- 2025 period; it will be proposed to promote PHL – SKU employees of 24 employees

Bungo Tebo Mill:

Realization of Employee Promotion on 2022 Period:

1. On October 2022; Daily Workers (PHL) to Permanent Workers (SKU) on Bungo Tebo Mill, as follow:

No.	Number of Memorandum	Date	Workers Name	Position
1	0277/HR-RO3/MEMO/SK-PB/09/2022	06-Oct-22	Longgo Situmeang	Kernel Operator
2	0423/HR-RO3/MEMO/SK/09/2022	06-Oct-22	Antoni Ramanda	sorting workers

2. On November 2022; Proposed by Bungo Tebo Mill Manager to HRD Manager Plt. III through Memorandum No. 152/RAU-PBT/MEMO/11/2022 dated 11 November 2022, totaling 10 employees, as follows:

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		<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">No.</th> <th style="text-align: left;">Name</th> <th style="text-align: left;">Position</th> </tr> </thead> <tbody> <tr><td>1.</td><td>Awaludin</td><td>KCP Operator Helper</td></tr> <tr><td>2.</td><td>Ebet Enjer Immanuel</td><td>Tipler Station Operator Helper</td></tr> <tr><td>3.</td><td>Joko Sutejo</td><td>Mechanic</td></tr> <tr><td>4.</td><td>Iswandi</td><td>Mechanic</td></tr> <tr><td>5.</td><td>Samsul</td><td>Mechanic</td></tr> <tr><td>6.</td><td>Muslim</td><td>Sortage officer</td></tr> <tr><td>7.</td><td>Ahmad Nur Islam</td><td>Tipler Station Operator Helper</td></tr> <tr><td>8.</td><td>Deni Firmansyah</td><td>Sortage officer</td></tr> <tr><td>9.</td><td>Abdullah</td><td>Cleaning Service</td></tr> <tr><td>10.</td><td>James Fernando N. Butar Butar</td><td>Warehouse Officer</td></tr> </tbody> </table> <p>Based on the list of workers as of February 2023, there are still 29 employees with PHL status. Furthermore, Bungo Tebo Mill made a Promotional Program for PHL to SKU for 2 years (2023 – 2024) and this program was recognized by the Jambi Province Manpower and Transmigration Office cq. Head of Industrial Relations and Work Requirements Division, as follows:</p> <ul style="list-style-type: none"> • 2023 period; it will be proposed to promote PHL-SKU employees by 20 employees • 2024 period; there will be promotions for PHL-SKU employees of 9 employees. <p>Thus, in the next audit, verification and evaluation will be carried out related to the realization and achievement of the targets set in the PT RAU PHL-SKU Promotion Program.</p>	No.	Name	Position	1.	Awaludin	KCP Operator Helper	2.	Ebet Enjer Immanuel	Tipler Station Operator Helper	3.	Joko Sutejo	Mechanic	4.	Iswandi	Mechanic	5.	Samsul	Mechanic	6.	Muslim	Sortage officer	7.	Ahmad Nur Islam	Tipler Station Operator Helper	8.	Deni Firmansyah	Sortage officer	9.	Abdullah	Cleaning Service	10.	James Fernando N. Butar Butar	Warehouse Officer	
No.	Name	Position																																		
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10.	James Fernando N. Butar Butar	Warehouse Officer																																		
<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>Bungo Tebo POM and Estate: Freedom of association policy, dated 1 December 2019, written in Bahasa Indonesia. The dissemination of the policy has been conducted through pamphlet in notification board located in housing complex,</p>	Complied																																	

	<p>- Critical (Major) compliance -</p>	<p>Estate/Plantation Office, and workplaces. Moreover, the dissemination has been conducted through annual dissemination/training. Based on the interview to workers in Mills and Estates/Plantations, it can be concluded that the company has disseminated regularly the policy of freedom association and the right to collective bargain.</p> <p>The workers have had PUK SPPP-SPSI Workers Union based on the Minutes of the Establishment of the New Management of the PUK SPPP-SPSI PT Rigunas Agri Utama on 11 October 2019. All members already have a membership card that contains information on their membership number, name, place and date of birth, work unit, organizational position and address.</p> <p>The organization structure of the SPPP-SPSI PUK has been reported to the Tebo Regency Industry, Trade and Manpower Office on 11 October 2019 through a letter from the Head of the Office of Industry, Trade and ManpowerNo. 560/621Perindagnaker/2019.</p> <p>Scheme smallholders:</p> <p>The smallholder scheme has set a policy for each cooperative. This Cooperative Policy has established policies related to:</p> <ul style="list-style-type: none"> - Fulfilments of legal requirements that apply in the implementation of activities in cooperatives. - Ethical conduct in doing business in all business transactions and operations. - Respect human rights by treating all cooperative employees and farmers fairly. - Forbid minors to work in every activity. - Prevent sexual harassment and various forms of violence against women. - Respect every cooperative's employee or farmer to form or become a member of a trade union and ensure the confidentiality of the 	
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		<p>reporter (Whistle-blower).</p> <ul style="list-style-type: none"> - Respect human rights defenders (HRD) without giving threats and intimidation. <p>Based on interview with workers in cooperatives, they said that the policy has been disseminated to workers. However, the workers do not have willingness to form labor union due to most of the workers are casual workers. Furthermore, there is no issue of violation of employment regulation.</p>	
6.3.2	<p>Minutes of meetings between the unit of certification with trade unions or worker representatives who are freely elected, are documented in the national languages and available upon request.</p> <ul style="list-style-type: none"> - Minor compliance - 	<p>Bungo Tebo POM and Estate:</p> <p>Several meetings were held by the Labor Union with the management of PTRAU, in the period of 2022 there were 3 meetings. For instance, meeting on 25 November 2022 discussed the aspiration of workers to have a church in this year to celebrate the Christmas.</p> <p>Scheme smallholders:</p> <p>No worker union. Most of the workers are field worker, which as temporary workers.</p>	Complied
6.3.3	<p>Management does not interfere with the formation or operation of registered labour organizations/unions, or other freely elected representatives for all workers, including migrant and contract workers.</p> <ul style="list-style-type: none"> - Minor compliance - 	<p>Bungo Tebo POM and Estate:</p> <p>In forming the composition of the PUK SPSI management, the management of PT RAU did not interfere and influence the agreed process. Even PT RAU has provided facilities and infrastructure in the form of buildings (rooms and officeequipment) that can be used as a place to carry out PUK SPSI activities.</p> <p>Based on an interview with the head of the PT RAU PUK SPSI t union, it was stated that the management of PT RAU did not interfere in matters regarding the determination of the union board and did not influence workers in terms of participation as members of the PUK SPSI union.</p> <p>Scheme smallholders:</p> <p>Based on interview with workers in cooperatives, they said that the policy has been disseminated to workers. However, the workers do not have a</p>	Complied

		willing to form a labor union due to most of the workers are casual workers. Furthermore, there is no issue of violation of employment regulation.	
Criteria 6.4: Children are not employed or exploited.			
6.4.1	<p>A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.</p> <p>- Minor compliance -</p>	<p>Bungo Tebo POM, Estate and Smallholder:</p> <p>PT Rigunas Agri Utama has established Company Policy dated 1 December 2019, that stated no children is allowed to work in any activities/processes in company. This policy was continuously socialized to all worker and contractor on 17-21 February 2023. It stated on Company policy on point 14; "Prohibit children from working in any company activities".</p> <p>In the contract agreements with the local contractor of A. Rahman, it describes compliance with the applicable regulatory and statutory requirements in Article 6, states that; The Second Party (Contractor) is obliged to follow the applicable government regulations in providing vehicles and drivers, including but not limited to manpower and tools to carry out work... ". Additionally, also stated that the contractor is obliged to comply with the applicable labor regulations, especially with regard to the payment of wages and the age of workers, namely over 18 (eighteen) years of age. As well as complying with the prohibition on the employment of children, forced labor and workers from human trafficking and must comply with the company's business ethics and comply with all certification requirements and standards.</p> <p>Bungo Tebo Plasma / Smallholder has determined and affirmed that it is related to the prohibition of workers under age (<18 years).</p>	Complied
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>- Critical (Major) compliance -</p>	<p>Bungo Tebo POM and Estate</p> <p>PT RAU still consistently implements policies related to underage workers in the worker recruitment process. Based on document verification of list employee Bungo Tebo Estate and POM, its confirmed that there is no workers under age of 18 years old; the youngest workers as follow:</p> <ul style="list-style-type: none"> - Employee of Bungo Tebo Estate, Ferbruary 2023 period. There were 	Complied

		<p>840 workers, and the youngest when he joined work namely Levis Halawa date of birth 2 May 2003 and joint on 1 November 2021 (18 years and 5 months) as harvester.</p> <ul style="list-style-type: none"> - Employee of Bungo Tebo Mill, on February 2023 period. There were 100 workers in operation, the youngest and the youngest when he joined work namely Andri yanto date of birth 24 November 2003 and joint on 1 August 2022 (18 years and 9 months) as Separation Operator Assistant -Tippler/Hoist Crane. <p>Company also has procedure for employee recruitment as per SOP AA-HR-305.2 – RO Rekrutmen dan Seleksi Karyawan, dated 1 February 2009. stated in Section 7.0 Tahapan Seleksi – <i>usia minimum kandidat yang diterima adalah 18 tahun</i>, minimum age employee hiring accepted was 18th years old.</p> <p>Based on interviews with 5 workers at Bungo Tebo Mill and 5 harvesters and 3 spraying workers at Bungo Tebo Estate, that until now there are no underage workers (under 18 years old), this is because PT RAU management strictly applies the requirement of workers at least 18 years old.</p> <p>Scheme smallholders:</p> <p>The process of recruiting workers in the smallholder scheme is not formal like that of companies in general. The process of recruiting workers in the smallholder scheme is carried out directly by the farmer concerned or through the Chair of the Farmer Group. Based on interviews with the Head of KUD, the recruitment of workers (harvesters and other operations) is carried out by considering the age of prospective workers according to the Cooperative Policy, which is at least 18 years old.</p> <p>The smallholder scheme has set a policy for each cooperative. This Cooperative Policy set date on 5 January 2022, this policies is related to and not limited to:</p> <ul style="list-style-type: none"> - Fulfilments of legal requirements that apply in the implementation of activities in cooperatives 	
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		<ul style="list-style-type: none"> - Ethical conduct in doing business in all business transactions and operations - Respect human rights by treating all KUD employees and farmers fairly - Prohibit minors from working (child labour) in any operational activities, in this case the required age is at least 18 years - Prevent sexual harassment and various forms of violence against women - Respect every KUD employee or farmer to form or become a member of a trade union and ensure the confidentiality of the reporter (Whistle-blower) - Respect human rights defenders (HRD) without giving threats and intimidation - Do not provide work under threats, sanctions or penalties where workers do not have the freedom to agree to the implementation of the work. <p>Following are the socialization activities of Cooperative policies to smallholders in each cooperative:</p> <ul style="list-style-type: none"> • The Koperasi Sawit Sumay Makmur Policy, which was published on 5 January 2022 and this policy has been socialized to all its members on 15 – 17 February 2022. • The Koperasi Produsen Tanjung Dani Skati Policy, which was published on 5 January 2022 and this policy has been socialized to all its members on 9 – 11 February 2022. • The Koperasi Sumber Usaha Policy, which was published on 5 January 2022 and this policy has been socialized to all its members on 7 – 8 February 2022. • The Koperasi Sawit Bina Tani Policy, which was published on 5 January 2022 and this policy has been socialized to all its members on 15 – 17 February 2022. • The Koperasi Barokah Policy, which was published on 5 January 2022 	
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		<p>and this policy has been socialized to all its members on 21 – 22 February 2022.</p> <p>Based on interviews with several member farmers (smallholders) during field visits, they have understood the age limit for workers, which is 18 years. And until now there has been no use of underage workers (18 years).</p>	
<p>6.4.3</p>	<p>(C) Young person maybe employed only for non-hazardous work with protective restrictions in place for that work. - Critical (Major) compliance -</p>	<p>Bungo Tebo POM, Estate and Smallholder:</p> <p>Regarding recruitment, the management of PT RAU has established procedures that refer to the applicable laws and regulations. Based on Law no. 13 Year 2013; that:</p> <ul style="list-style-type: none"> • The minimum age for permanent work is 15 years. The law prohibits companies from hiring children. According to the law, a child is anyone who is less than 18 years old. • Young workers aged between 13 to 15 years may be employed for light work, provided that the work does not affect their physical, mental and social development. Light work requires written permission from parents/guardians and the employer must provide them with a work contract; children can only be employed during the day for 3 hours (maximum) without disturbing their schooling; <p>Based on document verification and interview with workers that there is no young person under 18th years old employ in PT Rigunas Agri Utama, Bungo Tebo Estate and Mill. And there are no identified young workers aged 13-15 years. Because in procedure No. AA-HR-305.7-R0 regarding Selection, Recruitment and Appointment of Non-Staff Workers, at the stage of selection and verification of administrative documents explains that the minimum age of candidates to be accepted is 18 years of age.</p> <p>Based on document verification of list employee Bungo Tebo Estate and POM, its confirmed that there is no workers under age of 18 years old; the youngest workers as describes on indicator 6.4.2 above.</p>	<p>Complied</p>

<p>6.4.4</p>	<p>The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.</p> <p>- Minor compliance -</p>	<p>Bungo Tebo Estate and Mill</p> <p>No child labor policy has been disseminated to relevant stakeholder on based on interview with Labor Union, Gender Committee, Village Heads, and local contractor. It is also can be seen the poster of anti-child labor in the area of office, workplace and housing.</p> <p>Moreover, the policy has been included into contractual agreement with contractor. In the contract stated that the contractor must be obey and comply to regulation and company policy including no forced labor and child labour.</p> <p>Based on interview with workers, Labour Union, Gender Committee, Village Heads, including FFB Contractor, can be concluded that the company and smallholders have disseminated the no-child labor policy.</p> <p>Scheme smallholders:</p> <p>The smallholder scheme has set a policy for each cooperative. This Cooperative Policy has established policies related to no child labour. Based on field visit and interview with smallholders and workers, it is known that they have understood the policy to prevent child labour. The has been not found child labour in smallholder's area.</p>	<p>Complied</p>
<p>Criteria 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.</p>			
<p>6.5.1</p>	<p>(C) A policy to prevent sexual and all other form of harassment and violence is documented, implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>Bungo Tebo POM and Estate:</p> <p>A policy to prevent sexual and all other form of harassment and violence are available, "Kebijakan Perusahaan" signed by Managing Director on 1st December 2019. The policy has been communicated to all level of workforce.</p> <p>Based on interview with workers, Labor Union, and Gender Committee, it is known that they have understood the company's policy to prevent sexual or other form of harassment.</p> <p>Moreover, the company has formed a Gender Committee as a place to submit grievance related sexual or other form of harassment, or violation</p>	<p>Complied</p>

		<p>of reproductive rights. Based on interview with Head of Gender Committee and women workers, it is known that there is no negative issue related to sexual harassment or violation of reproductive rights.</p> <p>Scheme smallholders: The smallholder scheme has set a policy for each cooperative. This Cooperative Policy has established policies related to prevent sexual harassment and various forms of violence against women. Based on field visit and interview with smallholders and workers, it is known that they have understood the policy to prevent sexual and all other form of harassment. The has been no sexual harassment in smallholder’s area.</p>	
<p>6.5.2</p>	<p>(C) A policy to protect the reproductive rights of all, especially of women, is documented, implemented and communicated to all levels of the workforce. - Critical (Major) compliance -</p>	<p>Bungo Tebo POM and Estate: A policy to protect the reproductive rights is available in “Kebijakan Perusahaan” signed by Managing Director on 1st December 2019. The company has also issued a Memorandum of Group Manager No. 002/EM-RAU/KBT/MEMO/2/2021 dated February 1, 2021, explains that: Basedon Law no. 13 of 2003 article 83: "Female workers/laborers whose children arestill breastfeeding must be given a proper opportunity to breastfeed their children if it must be done during working hours", for this reason the companymanagement provides rest periods to breastfeed their children withthefollowing conditions:</p> <ul style="list-style-type: none"> - Break time for breastfeeding every weekday from 10.00 to 10.30 - Signing the permission to go home breastfeeding that has been provided every day - Wages in kind are adjusted to the applicable company regulations. <p>The company has provided menstrual leave and maternity leave for female employee in accordancewith the recommendation from paramedic in clinic, and this is in line with collective bargaining agreement (CBA) and applicable regulations.</p> <p>The company has consistently performed pregnancy tests to women workers who worked as a fertilizer and spraying every 1 month. If they</p>	<p>Complied</p>

		<p>are found pregnant, they will be mutated to another not chemical related job.</p> <p>Based on interview with women workers, Labor Union, and Gender Committee, it is known that they have understood the company’s policy to protect reproduction rights including to give breast feeding to their babies.</p> <p>Scheme smallholders:</p> <p>The smallholder scheme has set a policy for each cooperative. This Cooperative Policy has established policies related to protect the reproductive rights. Based on field visit and interview with smallholders and workers, it is known that they have understood the policy to protect the reproductive rights. The has been no violation of to protect the reproductive rights in smallholder’s area</p>	
6.5.3	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified in accordance with applicable regulations in Indonesia.</p> <p>- Minor compliance -</p>	<p>Bungo Tebo POM, Estate and Smallholder:</p> <p>The company has conducted a survey to 13 young/new mothers who have babies using a questionnaire related to the needs of breastfeeding mothers which was promoted by the company doctor i.e. dr. Yudy Chandra. The survey was conducted in the period of 21 – 22 December 2022 with the results of the survey identified that there are several things that young/new mothers need, as follows:</p> <ol style="list-style-type: none"> 1. Room for breastfeeding mothers in accordance with Minister of Health Regulation No. 15 of 2013. Company stipulation: that nursing mothers room has been created on 2021 at Company’s Clinic and Day Care Centers, furthers to be carry out routine maintenance of available nursing mothers' rooms. 2. Time/permission for breastfeeding mothers. Company compliance: permission is given to female employees who are still breastfeeding their children from 10.00-10.30 in accordance with Memorandum No. o. 002/EM-RAU/KBT/MEMO/2/2021 dated February 1, 2021. 	Complied

		<p>3. The need for nutritious food for mothers and children. Company compliance: providing employee cooperatives that provide special food needs for mothers and babies.</p> <p>Based on an interview with the Head of the Gender Committee, Ibu Nurbaity, the company is very committed to the rights of young mothers who are breastfeeding. The Posyandu program (Integrated Healthcare Center) is routinely carried out every month, the last being carried out on January 20 2023 which was attended by around 20 young mothers who were still breastfeeding. This Posyandu was held in the company's clinic courtyard supervised by dr. Yudi Chandra, some of the programs being implemented are: providing immunizations to children (under 5 years of age), providing nutritious food.</p>	
6.5.4	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, as long as the complaint is supported with adequate information, is documented, implemented and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p>	<p>Bungo Tebo POM and Estate:</p> <p>The company has established mechanism for handling grievance from external party as in "Mekanisme Penanganan Keluhan Stakeholder" dated 22 Apr 2019. Smallholders are include as external in the mechanism. And there is also procedure no. SOP AA-GL-510.1.R0 dated January 1, 2013 regarding the Handling of Public Complaints, explains that this procedure is the handling of complaints from the concerned parties.</p> <p>The company has also provide channel to report to report if there is violation to the principles and objectives, through email whistleblow@rgei.com or phone (62) 81 2755 2528.</p> <p>During the surveillance audit, 2 complaints were identified from the local community as explained in the indicator 4.2.3 above. The company has responded to the complaint in accordance with established procedures (SOP AA-GL-510.1.R0 dated January 1, 2013 regarding the Handling of Public Complaints).</p> <p>Scheme smallholders</p> <p>Cooperative has prepared mechanism on communication with interested parties under "Mekanisme Komunikasi, Konsultasi dan Keluhan" produced</p>	Complied

		<p>January 2019. This document being part of List of Publicly Available Document in Koperasi Sawit Suway makmur, Koperasi Belarik Jaya, Koperasi Sawit Tambara Jaya, Koperasi Sumay Jaya and also Koperasi Sumber Usaha.</p> <p>Cooperative has also prepared a procedure to uphold policy on secrecy of whistle blower under "Mekanisme Jaminan Pelapor dan Pengungkapan Kasus" dated 12 June 2015.</p>	
<p>Criteria 6.6: No forms of forced or trafficked labour are used.</p>			
<p>6.6.1</p>	<p>(C) All work is voluntary and the following are prohibited:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports; • Payment of recruitment fees; • Contract substitution without worker’s consent • Involuntary overtime; • Lack of freedom of workers to resign • Penalty for termination of employment, unless the unit of certification and the workers agree to the penalty and it is stated in the employment agreement • Debt bondage • Withholding of wages <p>- Critical (Major) compliance -</p>	<p>Bungo Tebo POM and Estate:</p> <p>There is no change in term of the statement of conformity when comparing from the previous audit result.</p> <p>Based on document verification (list of employees, salary slips and payroll for the period of February 2023), there was no indication of forced labour and/or human trafficking. All employees have work agreement, regulating the rights and obligation of company and employee. The work agreement including working hour and salary payment.</p> <p>Based on interviews with PT RAU management, no work termination was identified that was not in accordance with the work contract, the determination of overtime time was in accordance with the Overtime Work Order (SPL), and was not identified there are employees who work because of debt with the company. Based on the verification of salary slips and payrolls for the period of February 2023, it was not identified that there were salary cuts that were not in accordance with the regulations, even though there were subsidies and deductions for BPJS contributions that were in accordance with applicable regulations. There was no identification of a work bond that impeded employee resignation, there was no indication of a cost involved in the employee recruitment process.</p> <p>Based on interview with management and verification to the master list of employees February 2023 period, that there is no use of</p>	<p>Complied</p>

		<p>migrant/foreign/ honorary worker. All employee including temporary workers have work agreement; regulating the scope of work, work agreement timeframe, working hour, salary payment, overtime and Jamsostek.</p> <p>From several employees at Bungo Estate and Mill who were interviewed during the audit, that in the employee recruitment process there were no retention of identity documents or passports, payment of recruitment fees, contract substitution without worker’s consent, involuntary overtime, lack of freedom of workers to resign, penalty for termination of employment, unless the unit of certification and the workers agree to the penalty and it is stated in the employment agreement, debt bondage and withholding of wages.</p> <p>Scheme Smallholders:</p> <p>Similar to estate and mill, there is no forced and trafficked labour has noted during assessment.</p> <p>KUD has a policy related to use of migrant worker inside “Kebijakan Koperasi”. Based on document verification and interview with worker, there were no migrant worker used in cooperative.</p> <p>All worker in cooperative have work agreement. All of them already appointed as permanent worker.</p>	
6.6.2	<p>(C) Where temporary (Specified Time Work Agreement/PKWT) or migrant workers are employed, a specific labour policy and procedures are established and evidence of implementation is available.</p> <p>- Critical (Major) compliance -</p>	<p>Bungo Tebo POM, Estate and Smallholder:</p> <p>Based on the list of PT RAU employees as of February 2023, there are 2 types of employees at PT RAU, namely Permanent Workers (SKUH and SKUB) as much as 185 workers and non-permanent workers (PHL: Pekerja Harian Lepas - Casual Daily Workers) as much as 655 workers.</p> <p>PT Rigunas Agri Utama has established mechanism/procedure related to recruitment; SOP no. AA-HR-305-7-00 dated 7 August 2021 and approved by Managing Director Kevin Tio on 14 September 2021– regarding Selection, Recruitment and Appointment of Non-Staff Workers.</p>	Complied

		<p>Further, PT RAU – Tebo has been issued a Memorandum on September 1, 2020 No. 034/ RAU/MEMO/IX/20 regarding Guidelines for the acceptance and appointment of employees of PT RAU Bungo Tebo Group, including explaining the determination of the maximum term of PKWT for 2 (two) years by considering evaluation of eligibility.</p> <p>This memorandum is effective from September 1, 2020 and this memorandum is also based on reference to Law no. 11 of 2021 concerning Cipta Kerja.</p> <p>Referring to procedure (SOP no. AA-HR-305-7-00) and Memorandum No. 034/ RAU/MEMO/IX/20, PT RAU has implemented it in the worker recruitment process. Although based on document studies and interviews with the chairman of the trade union T.J Purba, that there are still workers with PHL (daily worker) status. Based on List of employees of Februari 2023 there were non-permanent workers (PHL: <i>Pekerja Harian Lepas</i> - Casual Daily Workers) as much as 655 workers</p> <p>However, PT RAU has made a promotion program for the appointment of these PHL workers, especially workers with the main nature of work, such as harvesters, FFB loaders as mentioned in indicator 6.2.7 above.</p>	
<p>Criteria 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.</p>			
<p>6.7.1</p>	<p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p>Bungo Tebo POM and Estate</p> <p>PT Rigunas Agri Utama – Bungo Tebo POM and Estate has appointed the responsible person for H&S is identified as per P2K3 (Safety Committee Meeting). P2K3 has an approval from Manpower and Transmigration Office.</p> <p>Bungo Tebo POM</p> <p>P2K3 approval based on “Keputusan Kepala UPTD Balai Pengawasan Ketenagakerjaan Wilayah II Dinas Tenaga Kerja dan Transmigrasi Provinsi Jambi Nomor: 560/436/UPTD II/Nakertrans 3.1/III/2019 Tentang Pengesahan Panitia Pembina Keselamatan dan Kesehatan Kerja (P2K3) Pada Perusahaan PT Rigunas Agri Utama PMKS” issued September 2019.</p>	<p>Complied</p>

		<p>P2K3 headed by Mill Manager and secretary of P2K3 was OHS expert. Certificate OHS expert on behalf Sopian No: 5/6965/AS.02.04X/2020 dated 21 October 2020; Decree Letter OHS Expert from Ministry of Manpower "Keputusan Menteri Ketenagakerjaan RI Nomor: 5/9810/AS.02.04/X/2020 Tentang Penunjukan Ahli Keselamatan dan Kesehatan Kerja Umum Menteri Ketenagakerjaan RI" dated 21 October 2020 valid until 3 years. Licence No. Reg. 88650/PK3/AJ/12/2020/P0 dated 21 October 2020 valid until 21 October 2023.</p> <p>Bungo Tebo Estate:</p> <p>P2K3 approval based on "Keputusan Kepala UPTD Balai Pengawasan Ketenagakerjaan Wilayah II Dinas Tenaga Kerja dan Transmigrasi Provinsi Jambi Nomor: 560/434/UPTD II/Nakertrans 3.1/III/2019 Tentang Pengesahan Panitia Pembina Keselamatan dan Kesehatan Kerja (P2K3) Pada Perusahaan PT Rigunas Agri Utama Kebun" issued September 2019. P2K3 headed by Estate Manager and secretary of P2K3 is OHS expert.</p> <p>Decree Letter OHS Expert from Ministry of Manpower No. KEP.5/17413/AS.02.04/XII/2021 dated 29 December 2021 valid until 3 years, on behalf of Aldi Pradandi. Licence No. Reg. 107372/PK3/AJ/12/2021/P0 dated 29 December 2021 valid until 29 December 2024.</p> <p>The safety committees (P2K3) has conducted regular meeting every month to discuss OHS plan program achievement and corrective actions to achieve target and improve the program such as: Personal Protective Equipment (PPE), accident report, near miss report, review status of OHS program, P2K3 performance evaluation, etc. Notes of Safety Committee Regular Meeting (mill and estate) with workers were sighted.</p> <p>Sample of minutes of OHS meeting has been verified. For minutes of October – December 2022 has been attached on OHS Report. The report period of October – December 2022 has been submitted dated 06 January 2023.</p> <p>Scheme Smallholder</p>	
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		<p>For Smallholder, every smallholder cooperative has assigned responsible person to monitor OSH. However, the monitoring are supervised by OHS expert of Estate since he has attended OHS expert training.</p>	
<p>6.7.2</p>	<p>Accident and emergency procedures in Indonesian language are in place and clearly understood by all workers. Assigned operatives trained in first aid are present in both field and other operations. First aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>Bungo Tebo POM and Estate, and smallholder:</p> <p>PT Rigunas Agri Utama has prepared the procedure for emergency and work accidents under "Prosedur Kesiagaan dan Tanggap Darurat No.AA-EMS-820- PR" dated 5 April 2017, for spillage and fire; "Prosedur Pengendalian Gempa Bumi, Banjir dan Tanah Longsor No.AA-KL-18-EFP" dated 1st December 2010,for earthquake, flood and landslide. Since the Plasmas are full managed, the system is following the company's procedure.</p> <p>PT Rigunas Agri Utama has established the emergency response and preparedness team as per "Struktur Organisasi Tanggap Darurat", for Bungo Tebo POM and Estate.</p> <p>Company has Assigned operatives trained in first aider on behalf Yongki Arif Pratipta and Ratna Sari. Both first aider has been trained by Manpower Agency on 14 – 15 October 2021. Certificate and licence of First aider has been obtained:</p> <ul style="list-style-type: none"> - Certificate number No. Ser: UPTD/Nakertrans/3.1.2/X/2021, dated 16 October 2021, on behalf Yongki Arif Pratipta issued by Dinas Tenaga Kerja dan Transmigrasi Provinsi Jambi. Licence Reg. No. Ser/UPTDI/Nakertrans/3.1.2/2021 dated 16 October 2021 valid until 16 October 2024 - Certificate number No. Ser: UPTD/Nakertrans/3.1.2/X/2021, dated 16 October 2021, on behalf Ratna Sari issued by Dinas Tenaga Kerja dan Transmigrasi Provinsi Jambi. Licence Reg. No. Ser/UPTDI/Nakertrans/3.1.2/2021 dated 16 October 2021 valid until 16 October 2024 <p>Report on monitoring of first aid kit and first aid box on monthly basis can be demonstrated during audit.</p>	<p>Complied</p>

		<p>Scheme Smallholder</p> <p>Since the Plasmas are full managed, the system is following the company's procedure. Emergency and work accident procedure available under: "Prosedur Kesiagaandan Tanggap Darurat No.AA-EMS-820-PR" dated 5 April 2017, for spillage and fire; "Prosedur Pengendalian Gempa Bumi, Banjir dan Tanah Longsor No.AA- KL- 18-EFP" dated 1 December 2010, for earthquake, flood and landslide.</p> <p>Every smallholder cooperative has assigned responsible person to monitor OSH. However, the monitoring are supervised by OHS expert of Estate since he has attended OHS expert training.</p> <p>First Aid training for smallholders cooperative and responsible person at each cooperative conducted on 11 June 2019 (attended by 15 representatives) and 23 July 2019 (12 representatives). Refreshment for first aid has been conducted on 8 November 2022.</p>	
<p>6.7.3</p>	<p>(C) Workers use appropriate personal protective equipment (PPE) which is provided free of charge to all workers in the workplace, to cover all potentially hazardous operations, such as pesticides application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p>	<p>Bungo Tebo POM and Estate</p> <p>PT Rigunas Agri Utama has prepared the procedure of PPE - "SOP Alat Pelindung Diri' No: AA-SOP-OP- 101.3. The procedure stated that the company provided adequate and appropriate protective equipment for all workers at place of works, in line with the risk assessment. PT Rigunas Agri Utama has provided adequate Personal Protective Equipment (PPE) in accordance with its designation for each worker.</p> <p>Based on field observation and interview with workers, the personal protective equipment has been provided in accordance with the risk analysis document. For example:</p> <ul style="list-style-type: none"> - PPE intended for palm oil mill operators includes: Helmets, safety shoes, gloves, earplugs. - PPE for welders: Welding goggles, welding gloves, safety shoes and helmet - PPE for harvesters: Helmet, gloves, boots, safety goggles - PPE for spray and fertilizer employees: Apron, Rubber gloves, 	<p>Complied</p>

		<p>boots,safety googles, masks.</p> <p>The company also provides facilities for washing and storing PPE and personalclothing for sprayer and fertilizer workers. Bathrooms are also has been provided for sprayer and fertilizer workers so that after spraying and fertilizing workers can do body cleaning before going home.</p> <p>Scheme Smallholder</p> <p>Since the Plasmas are full managed, the system and procedure are following the company's procedure.</p> <p>Based on field observation and interview with workers, the personal protective equipment has been provided in accordance with the risk analysis document. For example, PPE for harvesters are Helmet, gloves, boots, safety googles</p>	
<p>6.7.4</p>	<p>All workers are provided medical care and covered by accident insurance. Costs incurred from work related incidents, leading to injury or illness, are covered in accordance with applicable regulations or by the unit of certification if applicable regulations do not provide protection.</p> <p>- Minor compliance -</p>	<p>PT Rigunas Agri Utama – Bungo Tebo provides insurance to all workers including non-permanent worker. Insurance covered by BPJS (national insurance), as mandated by government regulation. Medical checkup provided for all workers(not only for high-risk worker).</p> <p>PT Rigunas Agri Utama – Bungo Tebo provides clinical services for all workers. Referral are made to nearest hospital should the case is severe/critical. Medical check-up has been conducted for all workers all in Bungo Tebo The medical check-up including blood test, physical examination,audiometric test and spirometry test. Result of examination for worker is kept. Companu also providing social and accident insurance in from BPJS Ketenagakerjaan – for all workers.</p> <p>The latest payment of accident insurance BPJS Ketenagakerjaan has been paid on 8 February 2023, while health insurance BPJS Kesehatan has been paid on 7 February 2023.</p> <p>Scheme Smallholder:</p> <p>No workers being employ permanently by the smallholders. Provision of insurance in case of accident, through donation from smallholders and “Kelompok Tani”.</p>	<p>Complied</p>

6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics. - Minor compliance -	<p>Bungo Tebo POM and Estate: PT Rigunas Agri Utama has demonstrated the record of OHS injuries by using the LTA metrics. The monitoring is 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. The report period of October – December 2022 has been submitted dated 06 January 2023.</p> <p>The incident in 2022 were:</p> <ul style="list-style-type: none"> • Bungo Tebo Estate: totaled 13 incidents, LTI FR 0.8, LTI SR 3.1. • Bungo Tebo Mill: totaled 3 incidents, LTI FR 0, LTI SR 0. <p>The document of Accidents Investigation shown sufficient and there was conducted for all category of accidents.</p> <p>Scheme Smallholder: Based on interview with smallholder and record of accident, no accident occurred in smallholder during 2022.</p>	Complied
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Principle 7: Protect the environment, conserve biodiversity and ensure sustainable management of natural resources.

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

7.1.1	<p>(C) IPM plans are implemented and monitored to ensure effective pest control. - Critical (Major) compliance -</p>	<p>According to the Agricultural Policy Manual SOP AA-APM-OP-1100.10. R6 “Pengendalian Hama dan Penyakit” (Pests & Disease Control), certificate holder has plan to implement integrated pest management.</p> <p>Company has an effort to improve the natural predator of caterpillar pest by planting host plant along the main road and production road. Example of verified data until December 2022:</p> <table border="1" data-bbox="1093 1230 1832 1380"> <thead> <tr> <th rowspan="2">Host Plant</th> <th colspan="2">Qty</th> </tr> <tr> <th>Plan</th> <th>Actual</th> </tr> </thead> <tbody> <tr> <td><i>Casia Sp.</i></td> <td>20,100</td> <td>20,050</td> </tr> </tbody> </table>	Host Plant	Qty		Plan	Actual	<i>Casia Sp.</i>	20,100	20,050	Complied
Host Plant	Qty										
	Plan	Actual									
<i>Casia Sp.</i>	20,100	20,050									

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<i>Turnera subulate</i>	6,000	6,100
<i>Antigonon leptosus</i>	6,600	6,221

According to the interview with pest control officer in Bungo Tebo Estate obtain information that management has had a schedule to regularly monitored pest attack (census) as follows:

- Census of caterpillar/bag worm by monthly basis.
- Census of Ganoderma annually.
- Census rat infestation by recap the record of sortation in loading ramp.
- Census of Barn Owl Box occupation in three monthly basis.

The last census in Bungo Tebo Estate has been conducted in December 2022. Result of census shows that pest attack still under control (below the economic threshold) which is 0.3 – 1.3% (limit 5%).

During the field visit, auditor also observe barn owl box in the block. Estate manager informed that barn owl box has been installed with hectare covered 1:25 Ha (each owl box covered 25 Ha). The last monitoring in October 2022 namely as follows:

Afd.	Ha	Mature	Child	Egg	Owl Box	Occupation
I	314	24	1	9	16	69%
II	371	4	-	2	5	0%
III	620	18	1	4	15	60%
IV	471	24	2	1	22	59%
Total	1,776	70	4	16	58	57%

Scheme Smallholder:

		<p>Based on field visit and interview with smallholder representatives from KUD Tanjung Dani Sakti, KUD Sumber Usaha, KUD Sawit Bina Tani, KUD Sawit SUMay Makmur, KUD Barokah obtain information that they have been planted beneficial plant such as <i>Turnera subulata</i> and <i>Antigonon leptosus</i> as an early warning system in case of worm attack.</p> <p>They also installed barn own box (4 unit in each plot) to control rat population. All of this early warning system supported by the company.</p> <p>According to document verification, pest monitoring and control sighted pest management plan to conduct caterpillar/bag worm census in by monthly and barn owl box monitored in three monthly bases. Census was conducted by field supervisor that help by person that assign by board of KUD.</p> <p>During the field visit to the smallholder plot sighted no outbreak. All plot is in good condition and well maintained.</p>	
7.1.2	<p>Invasive species are not to be used according to applicable regulation in managed areas, unless plans to prevent and monitor their spread are implemented.</p> <p>- Minor compliance -</p>	<p>The company has issued memorandum No.025/R&D/MEMO/V/20, dated 11 May 2020, issued by R&D. The memorandum mentioned that based on a review of the operations carried out in plantation cultivation, there is no use of invasive species in the cultivation of oil palm plantations in Bungo Tebo Estate, this is based on several sources review including:</p> <ul style="list-style-type: none"> a. PermenLHK No.P.94/MENLHK/SEKJEN/KUM.1/12/2016, regarding invasive species. b. CABI.org c. Global Invasive Species Database. <p>During ASA1_1 it was known that PT Rigunas Agri Utama have a list of invasive species as per PermenLHK P.94/2016. This list was use to identified whether there are invasive species or no invasive species.</p>	Complied
7.1.3	<p>There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities.</p>	<p>Based on document review, field observation and interview to stakeholders obtained information that there is no record use of fire for pest control.</p>	Complied

	- Minor compliance -		
Criteria 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.			
7.2.1	<p>(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p> <p>- Critical (Major) compliance -</p>	<p>Based on the document verification and interview with management during ASA1_1, obtain information that there is only pesticide usage for chemical weeding and pest control (if needed). Recommendation of pesticide used are refer to SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i> (weed control) where explain the weeds type, weeding control methods and eradication, pesticide characteristic, and procedures of application (spraying volume, calibration, chemical weeding interval, target and sprayer maintenance).</p> <p>During the ASA1_1 audit, found some pesticide list that usually used with active ingredients such as isopropyl amine glyphosate, triclopyr, methyl metsulfuron, Glifosat, lamda sihalotrin and dimetil amina. Certificate holder no longer using paraquat since 15 November 2019, according to the circular letter of Deputy Managing Director No. 008/DMD/MEMO/OCT/19 dated 22 October 2019.</p> <p>To reduce the human and environmental risk, there is some continuous action that has been implemented, this continuous action is continue the previous actions namely as follows:</p> <ul style="list-style-type: none"> • Set up the pesticide rotation. For example, chemical weeding rotation is 4 times a year where the rotation in immature and early mature more often than mature and old palm. • Using the ultralow volume nozzle to minimize water consumption and reduce the risk for environment. During the field visit to the pesticide store sighted the micron herby system knapsack as example. • Conducted regularly training for pesticide applicator and equipped them with appropriate PPE's. • Delaying the pesticide if weed or pest is under control. According to the interview with estate manager obtain information that the 	Complied

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pesticide rotation can be delayed or reduced especially in mature or old palm where weeds/pest population are under control.

- Minimalize contamination for pesticide applicator and their families by ensuring them to clean themselves before back home.

PT. Rigunas Agri Utama - Bungo Tebo refers to "Daftar Pestisida yang Digunakan PT RAU", period 2022:

2022

Brand	Active Ingredient	LD50	WHO Class	Target
Elang 480SL	Isopropil Amina Glifosat 480 g/l	5,000	III	Weeds with broad leaves
Sweeper 480SL	Glifosat 356 g/l	4,230	III	Weeds with broad leaves
Polydor 25 EC	Lambda sihalotrin 25gr/ltr	2,625	III	Weeds with broad leaves
Kenlone 480 EC	Trychlopyr: 480 gr/ltr	4,500	III	Weeds with broad leaves
Metaprima 20WGD	Methyl metsulfuron	5,000	III	Weeds with broad leaves
Kenrane 288EC	trifluroksipir-1 Metil heptil ester: 288 gr/ltr	5,000	III	Weeds with broad leaves
Bastamet 150SL	Glufosinate Ammonium	1,730	II	Weeds with broad and narrow leaves
Rapid 20 WG	Methyl metsulfuron	5,000	III	Weeds with broad leaves

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<p>7.2.2</p>	<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. - Critical (Major) compliance -</p>	<p>PT. RAU – Bungo Tebo prepared the calculation for pesticide use with active ingredient use, active ingredient and LD50 applied per Ha – monitored per year. 2022 (January – December)</p>						<p>Complied</p>																																																
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7.2.3	<p>(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p> <p>- Critical (Major) compliance -</p>	<p>Until this ASA1_1 audit obtains information that there is no pesticide use for control pest attack. All of pesticide only using for weeding (herbicide). Based on interview with IPM supervisor and smallholder representatives known that no outbreak that causes pesticide usage.</p>	Complied																		
7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in Indonesia best practice guidelines.</p> <p>- Minor compliance -</p>	<p>There was some pesticide usage especially in nursery area to prevent pest infestation. For example, there was a record of pesticide (active ingredients Lamda sihalotrin) to prevent <i>Spodoptera litura</i> infestation. This prophylactic usage has followed the national guidelines such as dosage, interval and infestation rate. Also, in accordance with Asian Agri's Research and Development guidelines.</p>	Complied																		
7.2.5	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat, are not to be used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks. The due diligence refers to:</p> <p>- Minor compliance -</p> <p>7.2.5a Judgment of the threat and verify why this is a major threat.</p>	<p>Asian Agri Top management has issued the letter (email) on 20 August 2019 to all Plantation Regional Head which stated that paraquat usage maximum until the end of September 2019 and the stock of paraquat by end of September 2019 must be zero (0).</p> <p>Based on document verification and field visit it was known that there is no use of Paraquat in 2022. Bungo Tebo Estate.</p> <p>Non conformity found during audit:</p> <p>During field visit it was found the paraquat usage by smallholder member without due diligence process, or when authorized by government authorities for pest outbreaks.</p> <p>- Based on field visit to smallholder plots at KUD Barokah Plot No 584</p>	Non-compliance																		

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		<p>M Hodi, Plot No.585 Slamet, Plot No. 697 Mulyadi and KUD Sawit Sumay Makmur, in area Plot No. 151 Harnowo, Plot No. 152 Damono, audit team found confirmed that weeds control in plots was handle by himself using Gramoxone.</p>	
	<p>7.2.5b Why there is no other alternative which can be used.</p>	<p>According to IPM procedures, certificate holder always using biological approach to monitor pest attack. For example, estate using <i>Tyto alba</i> to monitor rat infestation than using rodenticide.</p> <p>To maintain ground condition especially weeding control, certificate holder has had a procedures SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i> (Weed Control), there is no change related to procedures. This procedure has set the specific pesticide in with minimum risk in accordance with the target.</p>	
	<p>7.2.5c Which process was applied to verify why there is no other less hazardous alternative.</p>	<p>Certificate holder through Asian Agri’s Research and Development Department have researched some pesticide in specific target. The result of research and pesticide recommendation written in the SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i> (Weed Control).</p>	
	<p>7.2.5d Process to limit the negative impacts of the application.</p>	<p>During ASA1_1 has verified that the Organization has determined the SOP AA-APM-OP-1100.08-R6 dated 7 December 2015 regarding “<i>Pengendalian Gulma</i> (Weed Control)”, the SOP has established several procedures to reduce negative impact of the application as follows:</p> <ul style="list-style-type: none"> • Pesticide/herbicide selection to ensuring the application is effective. • Set up the appropriate nozzle in chemical weeding activity based on weed type, topography and availability of water. • Regularly spraying calibration to ensuring the application is effective and efficient. • Calculate pesticide/herbicide usage based on target (hectarage and weed type). • Spraying technic. 	

	<p>7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</p>	<p>During ASA1_1 has verified that the Certificate Holder did not use pesticide to eradicate pest without the outbreak. If any census result shows the pest attack almost reach the economical threshold, they usually conducted campaign test using pesticide if needed.</p> <p>Chemical weeding activity has regularly set by management. For example, normally circle, path and collecting point weeding conducted 4 times a year in immature and mature area. Those application can be reduced in line with the palm ages.</p>	
<p>7.2.6</p>	<p>(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they conduct.</p> <p>- Critical (Major) compliance -</p>	<p>Bungo Tebo Estate:</p> <p>There is no change in term of the statement of conformity when comparing from the previous audit result.</p> <p>During ASA1_1 has verified that the company provides pesticide training for sprayers. Training on pesticide use "Pelatihan Pestisida Terbatas" conducted on 11 September 2019, attended by 81 participants from PT RAU and PT IIS, 12 sprayer workers from Bungo Tebo Estate. Training conducted incorporated with Syngenta and "Komisi Pengawas Pestisida dan Pupuk" Provinsi Jambi. Another training of pesticide use carried out on 26 August 2015 by "Komisi Pengawas Pupuk dan Pestisida Pemerintah Provinsi Jambi". However, currently company has no longer use paraquat for weeds control so that it is not necessary to conduct the pesticide use training.</p> <p>For refreshment training for spraying workers are regularly conducted by Bungo Tebo Estate to updates the knowledge about the activity of pesticide/herbicide application. Latest training conducted on 15 June 2022 attended by 23 participants.</p> <p>Application of pesticides was following SOP of Pesticides Management – "Pestisida dan Pengelolaannya" (AA-APM-OP-1100.11-R1) Chapter III point 3.2 which stated that pesticide operator must be fit, not in pregnancy or breast feeding, must have meal before work, and uses appropriate PPE.</p>	<p>Complied</p>

		<p>Spraying team using sign board indicating spraying/herbicide application is in progress for a block. Spraying supervisor was pre-mixing the herbicide in the chemical warehouse, transport the mixed chemical via truck, using cone and spill tray on the field to minimize spillage. The type and dosage of herbicide are carefully measured and prepared for targeted weed control; circle and path spray or selective weeding (wooden, bracken, or VOP). Nozzle calibration conducted regularly and recorded – evident.</p> <p>Sprayers and spraying supervisor are trained with best management practice for weed control, spraying techniques, using PPE and received regular medical check-up. Clean water and soap on the field are provided for sprayer. Supervisor was equipped with first aid kit.</p> <p>Appropriate PPE has been provided by company and used by spraying workers such as: Apron, leather and rubber hand gloves, respiratory masker, safety goggles, head cover and rubber boot.</p> <p>Scheme Smallholder:</p> <p>During ASA1_1 has verified that the weed control/spraying program was carried by trained sprayers from PT. Rigunas Agri Utama.</p> <p>Confirmed during interview with Plasma Management and smallholders that spaying activity conducted only by special team 'TUS' from the company workers.</p>	
7.2.7	<p>(C) Storage of all pesticides in accordance with recognized best practices.</p> <p>- Critical (Major) compliance -</p>	<p>There is no change in term of the statement of conformity when comparing from the previous audit result.</p> <p>During ASA1_1 has been verified that SOP for pesticide storage has been provided in SOP "<i>Pengangkutan dan Penyimpanan Bahan Kimia AA-KL-02-EFP</i>" dated 1 February 2008, there is no change about the SOP.</p> <p>Pesticides are always applied in accordance with the product label and storage instruction. Agrochemicals storage was locked areas with limited access. The storage was ventilated. MSDS and hazard symbol label were provided nearby of agrochemicals. Emergency shower and eyewash were</p>	Complied

		<p>also provided to anticipate in case of an emergency of agrochemical handling. PPE for handling of chemicals were provided including boots, apron, safety glass, respiratory mask and hand gloves. The possible spill was managed. Secondary containment was provided around the chemical storage area. Spill kit was also provided in the area. 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. The company has temporary hazardous waste storage where all hazardous waste from all estates and mills collected. The storage has obtained the license as per "Keputusan Kepala Badan Penanaman Modal dan Pelayanan Perizinan Terpadu Satu Pintu Kabupaten Tebo Nomor: 01/2019 Tentang Izin pengelolaan Limbah Bahan Berbahaya dan Beracun (B3) Untuk Kegiatan Penyimpanan Sementara Limbah B3 kepada PT Rigunas Agri Utama Di Desa Tuo Sumay Kecamatan Sumay Kab. Tebo, Jambi" dated 28 April 2019 valid until 28 April 2024 (5 years).</p> <p>Storage keeper maintains the balance of incoming and outgoing hazardous waste. Hazardous wastes were sent to licensed contractor PT Shali Riau Lestari and PT. Hazmat Techno Indonesia for appropriate disposal.</p>	
7.2.8	<p>All pesticide containers that are disposed of and/or used for other purposes are managed according to applicable regulations and/or instructions on the packaging.</p> <p>- Minor compliance -</p>	<p>There is no change in term of the statement of conformity when comparing from the previous audit result. Up to now since previous assessment last year till the date of this audit, all pesticide containers disposed in accordance to company procedure which is Hazardous Waste Handling Procedure AA-KL-06-EFP Rev. 8 dated 01/06/2021. Stated in the procedure that ex pesticides container are treat as hazardous waste. The ex pesticide container store in the Licensed Temporary Hazardous Waste Storage with maximum store within 180 day and deliver to the Licenced Transporter and vendor of hazardous waste PT Hazmat Techno Indonesia and PT Putra Restu Ibu Abadi.</p>	Complied

		Details of contract agreement with third parties for hazardous waste management and its disposal record can be seen in indicator 7.3.2 below.	
7.2.9	<p>(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.</p> <p>- Critical (Major) compliance -</p>	Based on field verification and interviewing with the management and stakeholders, there is no aerial application of pesticide by PT Rigunas Agri Utama, both at the company owned plantation and the scheme smallholder plantation.	Not Applicable
7.2.10	<p>(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p> <p>- Critical (Major) compliance -</p>	<p>Bungo Tebo Estate and Mill</p> <p>Specific medical surveillance conducted twice a year by company. The latest MCU in Bungo Tebo Estate conducted on 30 November 2022 by company doctor and paramedic for 78 workers (spraying workers, manuring workers, warehouse, pest and disease workers. MCU covering: urine test, respiratory rate, heart rate, blood test (haemoglobin, leuokosi). According to test result confirmed that all the workers are normal and fit to work.</p> <p>Scheme Smallholder:</p> <p>Spraying activities in smallholder plots was conduct by TUS team from the company so the MCU as mention above.</p>	Complied
7.2.11	<p>(C) No pesticide-related work is carried out by pregnant or breastfeeding women, or people with medical limitations and they are offered other equivalent work alternatives.</p> <p>- Critical (Major) compliance -</p>	Pregnancy checks at PT RAU are carried out for female workers (especially jobs related to chemicals). This examination was carried out on November 4, 2022, for 87 female workers. From the results of the examination, there were no female workers who were pregnant. Based on interviews with nurses and female workers, pregnancy testing is applicable to all female workers without discrimination. So if there are female workers who are pregnant, the management of PT RAU will transfer their work to jobs that do not pose a risk to pregnancy, for example maintaining plants that are not in contact with chemicals. In addition, if there are female workers who are nearing their due date, they are given 3 months of maternity leave.	Complied

		<p>Based on interview with gender committee and union labour, the 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.</p> <p>Scheme Smallholder: Pesticide application in scheme smallholder is conducted by Sprayers Team (TUS) from the company.</p>	
<p>Note For 7.2.11 Referring to Act No. 13 of 2003 concerning Manpower, Act No. 35 of 2014 concerning Child Protection, and taking into account the risks of hazards on palm oil plantations and mills on the development and physical, mental and social health of children, the national interpretation mandates that the unit of certifications does not employ people under the age of 18 for pesticide spraying. For this reason, the provisions of young workers under 18 years in indicator 7.2.11 are irrelevant.</p>			
<p>Criteria 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.</p>			
<p>7.3.1</p>	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented in accordance with applicable laws and regulations.</p> <p>- Minor compliance -</p>	<p>There is no change in term of the statement of conformity when comparing from the previous audit result. Up to now since previous assessment last year till the date of this audit, procedure for waste management plan such as :</p> <ol style="list-style-type: none"> 1. Procedure AA-KL-05-EFP, procedure of non-hazardous waste handling covering: mill waste (used rail, used part, ex-chemical non-hazardous/toxic, EFB, fiber, shell), estate waste (used polybag, ex fertilizer sack), office waste (used paper, used work equipment), Workshop waste (used hose, hose, used parts, scarped), logistic waste (ex-fertilizer sack, used drum). 2. AA-KL-06-EFP rev. 07 dated 22 April 2016, procedure of hazardous waste handling including source of hazardous waste, handling process, packing process, hazardous waste storage, emergency situation handling on hazardous waste. 3. Procedure AA-KL-11-EFP, procedure of laboratory waste handling. 	<p>Complied</p>

		<p>4. Procedure to utilize the fiber and shell (solid waste) as a boiler fuel SOP No. AA-MPMOP-1400.04-R1 "Pemanfaatan fiber untuk bahan bakar".</p> <p>5. EFB (Empty Fruit Bunch) utilization as a mulching or organic fertilizer according to SOP Pemupukan AA-APM-OP-1100.09-R1.</p> <p>6. SOP AA-PL-04-EFP Rev. 2 dated 15 Jan 2010, procedure for utilize the waste water from waste water installation in to the plantation as land application.</p> <p>The company also have document "Aspek Dampak Lingkungan" updated 10 January 2023 that explain the identification of environment impact for each operational activities for example spraying activities; the environment impact are water pollution, health risk of the sprayers and hazardous waste management.</p>	
<p>7.3.2</p>	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p> <p>- Minor compliance -</p>	<p>PT Rigunas Agri Utama – Bungo Tebo has 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 from local government based on " SK Kepala Dinas Penanaman Modal, Pelayanan Terpadu Satu Pintu, Koperasi, Usaha Kecil dan Menengah Kabupaten Tebo Nomor 01 Tahun 2019" dated 28 April 2019 and valid for 5 years.</p> <p>The hazardous waste is sent to the registered collector/transporter which approved by Environmental Ministry, namely PT Hazmat Techno Indonesia and PT Putra Restu Ibu Abadi. Records of hazardous waste management are :</p> <p>a. Tripartite agreement between PT Rigunas Agri Utama, PT Hazmat Techno Indonesia and PT Putra Restu Ibu Abadi No. 01/SPJ/LEG-RIGUNAS/III/21 dated 26 March 2021 and valid until 31 December 2022.</p>	<p>Complied</p>

		<p>b. PT Hazmat Techno Indonesia – B3 Waste Transportation and/or B3 waste collection based on the Decree of the Director General of Land Transportation No. SK.00107/AJ.309/I/DJPD/2018 dated May 9, 2018 is valid for 5 years and the Approval Letter from the Investment Service and One Stop Integrated Licensing Service Number 660/1798.</p> <p>c. PT Putra Restu Abadi – B3 waste management services based on the Decree of the Minister of LHK RI No. S.575/Menlhk/Setjen/PLB.3/8/2020 dated 31 August 2020 valid for 5 years</p> <p>d. Electronic manifest for hazardous waste transporter in 2022</p> <ul style="list-style-type: none"> • Hazardous waste code A102d (Used battery), Manifest No. KLHK-1654761220 dated 13 May 2022 • Hazardous waste code B104d (Used chemical containers), Manifest No. KLHK-1654761220 dated 13 May 2022 • Hazardous waste code B105d (Used oil), Manifest No. KLHK-1654761466 dated 13 May 2022 • Hazardous waste code B110d (Used rags), Manifest No. KLHK-1654761315 dated 13 May 2022 • Hazardous waste code A102d (Used battery), Manifest No. KLHK-1669758735 dated 11 October 2022 • Hazardous waste code B104d (Used chemical containers), Manifest No. KLHK-1669758280 dated 11 October 2022 • Hazardous waste code B105d (Used oil), Manifest No. KLHK-1669757593 dated 11 October 2022 • Hazardous waste code B110d (Used rags), Manifest No. KLHK-1669757842 dated 11 October 2022 <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>	
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7.3.3	The unit of certification does not use open fire for waste disposal. - Minor compliance -	There is no change in term of the statement of conformity when comparing from the previous audit result. Up to now since previous assessment last year till the date of this audit, no fire has been used for waste disposal. Waste management already conducted in accordance to company procedures as mentions in indicator 7.3.1 above.	Complied
Criteria 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	Good agricultural practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts is documented. - Minor compliance -	The procedure to manage soil fertility is available (see detail in indicator 3.3.1). During ASA1_1 audit has verified that the implementation of manuring is based on fertilizer recommendation that set by Asian Agri's Research and Development Department. Fertilizer dosage has set according to the soil needed refer to Soil and Leaf analysis. Fertilizer applicator has been trained to not applied fertilizer in riparian or water source to minimize environmental impact. Other sample is land application, the land application officer ensures and control the effluent only applied in flatbed. The application out of flatbed area are strictly prohibited.	Complied
7.4.2	Analysis of tissue samples (e.g. leaves) and soil on a regular basis to monitor and manage changes in soil fertility and plant health is documented. - Minor compliance -	According to the Asian Agri's agricultural policy, soil sampling conducted every 5 years of palm age, while leaf sampling conducted annually. Based on document verification sighted the report of soil and leaf sampling in own estate and smallholders as follows: The last soil sampling has conducted in April 2018. Parameter that tested are N, C, K, Ca, Mg and pH. Document verified for example: - Location 1, dated 09/04/2018: No Lab 1851464 for depth 0-11 cm, No Lab 1851465 for dept 11-30cm, No Lab 1851466 for depth 30-64 cm, No Lab 1851467 for depth 64-130 cm. - Location 2, dated 07/04/2018: No Lab 1851468 for depth 0-11 cm, No Lab 1851469 for dept 11-30cm, No Lab 1851470 for depth 30-64 cm, No Lab 1851471 for depth 64-130 cm.	Complied

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		<ul style="list-style-type: none"> - Location 3, dated 07/04/2018: No Lab 1851472 for depth 0-11 cm, No Lab 1851473 for dept 11-30cm, No Lab 1851474 for depth 30-64 cm, No Lab 1851475 for depth 64-130 cm. <p>The last leaf sampling conducted in June 2022. Parameter that tested is major element (Ash, N, P, K Mg, Ca) dan Minor element (B, Cu, Zn, Mn, Fe). Leaf analysis conducted to 198 leaf samples. Result of analysis documented in Foliar Analysis Report, for example:</p> <ul style="list-style-type: none"> - No. 137/LSU-AGR/06/22 – Afd. I – Lab Ref No. 22L12824, dated 02/06/22, Block D08a, YOP 2008, 7.68% Ash, 2.68% N, 0.162% P, 1.07% K, 0.27% Mg, 0.61% Ca and 13 ppm B; Lab Ref No. 22L12825, dated 02/06/22, Block D08b, YOP 2008, 7.49% Ash, 2.70% N, 0.178% P, 1.11% K, 0.25% Mg, 0.57% Ca and 19 ppm B; Lab Ref No. 22L12826, dated 02/06/22, Block D08c, YOP 2008, 8.51% Ash, 2.54% N, 0.154% P, 1.03% K, 0.25% Mg, 0.51% Ca and 36 ppm B - No. 137/LSU-AGR/06/22 – Afd. II – Lab Ref No. 22L12867, dated 02/06/22, Block B19a, YOP 2019, 6.70% Ash, 2.67% N, 0.161% P, 1.13% K, 0.36% Mg, 0.62% Ca and 27 ppm B; Lab Ref No. 22L12866, dated 02/06/22, Block B19b, YOP 2019, 6.61% Ash, 2.64% N, 0.170% P, 1.25% K, 0.36% Mg, 0.62% Ca and 15 ppm B; Lab Ref No. 22L12872, dated 02/06/22, Block B19d, YOP 2008, 6.68% Ash, 2.99% N, 0.188% P, 1.31% K, 0.39% Mg, 0.65% Ca and 23 ppm B <p>Those analysis report generated the fertilizer recommendation 2023 by Asian Agri’s Research and Development Department, PT Nusa Pusaka Kencana – Tebing Tinggi.</p>	
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<p>7.4.3</p>	<p>A nutrient recycling strategy is in place, which include the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers. - Minor compliance -</p>	<p>Based on the Agricultural Policy Manual, certificate holder has a guidance in organic fertilizers such as Empty Fruit Bunch (EFB) and Palm Oil Mill Effluent (POME). Certificate holder has implemented EFB application in estate with dosage 30 – 50 ton/Ha in normal soil and POME with dosage 750 m³/Ha. There is no longer EFB application in Bungo Tebo Smallholders at this time, since their area include in replanting plan in 2020 and 2021.</p>	<p>Complied</p>																				
<p>7.4.4</p>	<p>Records of fertilizer inputs are maintained. - Minor compliance -</p>	<p>Bungo Tebo Estate: The company has established procedure on soil fertility, "SOP AA-APM-OP-1100.09. R1" - SOP Pemupukan, consist of type and recommendation of fertilizer for immature and mature areas, cycle, dosage and when fertilizer is applied. To maintain soil fertility, Bungo Tebo Estate applied placing palm frond above ground level (L shape) and empty bunch application as well as Palm Oil Mill Effluent (POME) application (land application). During field visit can be demonstrated that company has applied management strategy to maintain soil fertility according to the procedure. Bungo Tebo Estate applied inorganic fertilizer. Record of fertilizer application in Bungo Tebo Estate 2022 as a recommendation are available in "Fertilizer application and recommendation 2022 Bungo Tebo Estate". Record of fertilizer for 2022 as follows: 2022</p> <table border="1" data-bbox="1093 1101 1926 1380"> <thead> <tr> <th>Fertilizer Type</th> <th>Recommendation (Kg)</th> <th>Realization (Kg)</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>AC</td> <td>738,780</td> <td>733,841</td> <td>99.33</td> </tr> <tr> <td>MOP</td> <td>1,122,951</td> <td>1,122,969</td> <td>100</td> </tr> <tr> <td>RP</td> <td>767,254</td> <td>767,261</td> <td>100</td> </tr> <tr> <td>Kieserite</td> <td>76,119</td> <td>76,089</td> <td>99.96</td> </tr> </tbody> </table>	Fertilizer Type	Recommendation (Kg)	Realization (Kg)	%	AC	738,780	733,841	99.33	MOP	1,122,951	1,122,969	100	RP	767,254	767,261	100	Kieserite	76,119	76,089	99.96	<p>Complied</p>
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Dolomite	859,347	857,611	99.80
HGFB	58,170	58,093	99.87
Hi Kay	358,530	358,526	100

Scheme Smallholder:

Plasma Bungo Tebo has established procedure soil fertility in AA-PLASMA-PP-KS-03 – Panduan Pelaksanaan Pemupukan. The procedure covered type of fertilizer and its content, fertilizer quality analysis, fertilizer recommendation and fertilizer application which must be appropriate in dosage, time, place and technique.

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

To maintain soil fertility, plasma management also applied palm frond stacking in 'U' shape around palm oil trees. Plasma Bungo Tebo also applied inorganic fertilizer to maintain soil fertility. Record of fertilizer for 2022 for example:

2022

Fertilizer	KUD Sawit Bina Tani	KUD Barokah	KUD Sumber Usaha
ZA			
Dosage	1.75 Kg (1x application)		
Recommendation	99,960	156,240	12,989
Realization	99,960	156,240	12,989
MOP			

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		Dosage	1.50 Kg (1x application)		
		Recommendation	85,680	133,920	13,579
		Realization	85,680	133,920	13,579
		RP			
		Dosage	1.50 Kg (1x application)		
		Recommendation	42,840	66,960	24,797
		Realization	42,840	66,960	24,797
		Dolomite			
		Dosage	1.75 Kg (1x application)		
		Recommendation	49,980	78,120	2,716
		Realization	49,980	78,120	2,716
		HGFB			
		Dosage	0.05 Kg (1x application)		
		Recommendation	1,428	2,232	2,362
		Realization	1,428	2,232	2,362
		<p>Fertilizing program in Bungo Tebo Plasma 2022 has completed 100% as recommendation.</p> <p>Record of fertilizer issuance can be seen in "Bukti Permintaan Pemakaian Barang" (BPPD). For example BPPD No.39/PPK/KLO/02/2023 dated 03 February 2023 for Hamparan 10 KUD Bina Tani, fertilizer MOP, quantity 10,000 kg. The document signed by Secretary and Chairman of Koperasi, checked by Division Assistant and KTU, approved by Manager of Kebun Plasma Bungo Tebo.</p>			

Criteria 7.5: Practices minimise and control erosion and degradation of soils.																																												
7.5.1	<p>(C) Maps that identify marginal and fragile soils, including steep sloped land are available.</p> <p>- Critical (Major) compliance -</p>	<p>Bungo Tebo POM and Estate</p> <p>During this surveillance audit, there is no changing on the information of soil maps of Bungo Tebo Estate.</p> <p>PT Rigunas Agri Utama showed Peta Sebaran Satuan Tanah for Bungo Tebo Estate. The map indicated the predominant soil type consist of:</p> <table border="1"> <thead> <tr> <th>Soil Classification</th> <th>Slope (%)</th> <th>Drainage</th> <th>Class of land</th> <th>Limitation Factor</th> <th>Hectare</th> </tr> </thead> <tbody> <tr> <td>Aquic Dystrudepts</td> <td>0-8</td> <td>Bad</td> <td>Suitable (S3)</td> <td>Drainage, nutrient retention</td> <td>143</td> </tr> <tr> <td>Typic endoaquults</td> <td>0-8</td> <td>Bad</td> <td>Suitable (S3)</td> <td>Drainage, nutrient retention, texture</td> <td>146</td> </tr> <tr> <td>Typic Hapludults</td> <td>8-15</td> <td>Good</td> <td>Suitable (S3)</td> <td>Drainage, nutrient retention, texture</td> <td>14</td> </tr> <tr> <td>Typic Hapludults</td> <td>15-30</td> <td>Good</td> <td>Suitable (S3)</td> <td>Elevation, topography, nutrient available</td> <td>754</td> </tr> <tr> <td>Typic Hapludults</td> <td>>30</td> <td>Good</td> <td>Not Suitable (N1)</td> <td>Elevation, topography, nutrient available</td> <td>1,574</td> </tr> <tr> <td>Total</td> <td></td> <td></td> <td></td> <td></td> <td>2,631</td> </tr> </tbody> </table> <p>There is also topographic map indicating the elevation of Bungo Tebo Estate consist of 0- 8% and >30%. The limitation for the area is steep slope on some area. PT Rigunas Agri Utama did not open the area with steep slope > 40%. Topography level consist of 45 – 105 m.</p> <p>Scheme Smallholder</p> <p>During this surveillance audit, there is no changing on the information of soil maps Scheme smallholder.</p>	Soil Classification	Slope (%)	Drainage	Class of land	Limitation Factor	Hectare	Aquic Dystrudepts	0-8	Bad	Suitable (S3)	Drainage, nutrient retention	143	Typic endoaquults	0-8	Bad	Suitable (S3)	Drainage, nutrient retention, texture	146	Typic Hapludults	8-15	Good	Suitable (S3)	Drainage, nutrient retention, texture	14	Typic Hapludults	15-30	Good	Suitable (S3)	Elevation, topography, nutrient available	754	Typic Hapludults	>30	Good	Not Suitable (N1)	Elevation, topography, nutrient available	1,574	Total					2,631
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Complied

		Asian Agri’s Research and Development Department has conducted soil survey semi detail in Smallholder Area of PT Rigunas Agri Utama on 2021 based on report “Laporan Update Analisa Tanah Kebun Plasma Bungo Tebo”. Based on the report found the soil taxonomy refer to USDA 2006 is typic hapludults.	
7.5.2	The replanting of palm oil is not conducted extensively on steep terrain in accordance with applicable regulations. - Minor compliance -	Based and document verification and field observation, there is no extensive replanting activity in steep terrain both own estate and smallholder area. Company has implementing the procedure of soil conservation according to the procedure.	Complied
7.5.3	New palm oil planting is not conducted on steep terrain in accordance with applicable regulations. - Minor compliance -	Based and document verification and field observation, there is no new palm oil planting in PT Rigunas Agri Utama – Bungo Tebo. Company has implementing the procedure of soil conservation according to the procedure.	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. - Critical (Major) compliance -	Bungo Tebo Estate and POM: According to document verification during ASA1_1, organization has determined procedure related to “Konservasi Tanah dan Air”, in procedure no. AA-SOP-OP-1100-05.R3 “Konservasi Tanah dan Air” has determined strategy control erosion particular in slope area, such as: 0 – 5°, 6 – 12°, 13 –20° and more than 20°. The company has applied silt pit, L shape stacking frond and terracing in slope area to reduce soil erosion. Based on soil analysis, there is no fragile soil in PT Rigunas Agri Utama – Bunyo Tebo Estate. Based on Peta Sebaran Satuan Tanah for Bungo Tebo Estate scale 1:75,000 the predominant soil type consists of: Aquic dystrodepts, Typic hapludults, Typic endoaquults. PT Rigunas Agri Utama – Bungo Tebo Estate provides soil fertility test/soil type analysis based on Research and Development Asian Agri Group dated	Complied

		<p>09/04/2018. The soil type/classification result of Bungo Tebo Estate consist of 5 soil profile as below:</p> <ul style="list-style-type: none"> • Profile I Block D08i/2008, topography: flat 0 – 8 %, humidity regime: udic, Temperature regime: isohipertermik, drainage class: good, effective solum depth: >120 cm, ground water depth: 105 cm, epidedon: okrik, horizon: argilik, soil classification: typic endoaquults. • Profile II Block A94i/1994, topography: Hilly 33 %, humidity regime: udic, Temperature regime: isohipertermik, drainage class: good, effective solum depth: >120 cm, ground water depth: >120 cm, epidedon: okrik, horizon: argilik, soil classification: typic hapludults. • Profile III Block D08h/2008, topography: flat 0 – 8 %, humidity regime: udic, Temperature regime: isohipertermik, drainage class: good, effective solum depth: >120 cm, ground water depth: >120 cm, epidedon: okrik, horizon: argilik, soil classification: typic endoaquults. • Profile IV Block C17e/2017, topography: hilly 32 %, humidity regime: udic, Temperature regime: isohipertermik, drainage class: good, effective solum depth: >120 cm, ground water depth: >120 cm, epidedon: okrik, horizon: argilik, soil classification: typic hapludults. • Profile IV Block B96w/1996, topography: flat 0 – 8 %, humidity regime: udic, Temperature regime: isohipertermik, drainage class: good, effective solum depth: >120 cm, ground water depth: 120 cm, epidedon: okrik, horizon: kambik, soil classification: Aquic dystrodepts. <p>Bungo Tebo Estate has recorded use of nutrient recycling strategy by application of Empty Fruit Bunch (EFB), land application and use of palm residues after replanting. Dosage of EFB application in mature oil palm was 250 kg/palm/year and for immature plantation 125 kg/palm/year. Rotation for EFB application is 12 months. Field verification has been conducted at Afdeling II OP Y2019, the EFB has applied by the unit.</p>	
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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. - Minor compliance -	During this ASA1_1 audit, auditor has confirmed that there is no new planting (land extension) of PT RAU or plasma area. It is only replanting activity that conducted in 2019 for estate and 2022 for smallholders. Replanting activity in steep area using a terrace contour for soil conservation.	Not Applicable
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	During this ASA1_1 audit, auditor has confirmed that there is no new planting (land extension) of PT RAU or plasma area. It is only replanting activity that conducted in 2019 for estate and 2022 for smallholders. Replanting activity in steep area using a terrace contour for soil conservation.	Not Applicable
Criteria 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	(C) No new planting on peatlands, regardless of depth, after 15 November 2018, in existing plantation areas, as well as in new development areas. - Critical (Major) compliance -	Based on soil analysis, there is no peat soil identify in PT Rigunas Agri Utama – Bungo Tebo Estate. Based on “Peta Sebaran Satuan Tanah” for Bungo Tebo Estate the predominant soil type consists of: Aquic dystrodepts, Typic hapludults, Typic endoaquults.	Not Applicable
7.7.2	Peat areas within the managed area are inventoried, documented and reported to the RSPO Secretariat (effective from November 15, 2018). - Minor compliance -	Based on soil analysis, there is no peat soil identify in PT Rigunas Agri Utama – Bungo Tebo Estate. Based on “Peta Sebaran Satuan Tanah” for Bungo Tebo Estate the predominant soil type consists of: Aquic dystrodepts, Typic hapludults, Typic endoaquults. No peat inventory needed for PT Rigunas Agri Utama – Bungo Tebo Estate.	Not Applicable
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. - Critical (Major) compliance -	There is no change in terms of the statement of conformity when comparing from the previous audit result. Up to now since previous assessment last year till the date of this audit, no peat in PT Rigunas Agri Utama – Bungo Tebo plantation area. This was based on soil analysis, there is no peat soil identify in PT Rigunas Agri Utama – Bungo Tebo Estate. Based on “Peta Sebaran Satuan Tanah” for Bungo Tebo Estate the	Not Applicable

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		predominant soil type consists of: Aquic dystrochrepts, Typic hapludults, Typic endoaquults.	
7.7.4	<p>(C) Availability of implementation evidence of the water and land cover management program.</p> <p>- Critical (Major) compliance -</p>	There is no change in term of the statement of conformity when comparing from the previous audit result. Up to now since previous assessment last year till the date of this audit, no peat in PT Rigunas Agri Utama – Bungo Tebo plantation area. This was based on soil analysis, there is no peat soil identify in PT Rigunas Agri Utama – Bungo Tebo Estate. Based on “Peta Sebaran Satuan Tanah” for Bungo Tebo Estate the predominant soil type consists of: Aquic dystrochrepts, Typic hapludults, Typic endoaquults.	Not Applicable
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>- Critical (Major) compliance -</p>	<p>Based on semi-detailed soil map, there is no peat soil in Bungo Tebo Estate and scheme smallholder area.</p> <p>Not Applicable</p>	Not Applicable

PROCEDURAL NOTE: For 7.7.5: Detailed information on the RSPO Drainability Assessment Guide along with related concepts and detailed actions is contained in the Guidelines currently being adjusted / tested by the RSPO Working Group on Peatlands (Peatland Working Group / PLWG). The final version must obtain PLWG approval in January 2019 and will include additional Guide on the steps to be followed after deciding not to replant and the consequences for other stakeholders, farmers, local communities, and the unit of certification concerned. It is recommended that the trial methodology period is proposed to be extended for 12 months for all relevant management units (ie management units that have plantations on peat) to utilize the methodology and provide input to PLWG so that existing procedures can be further refined as needed before January 2020. The unit of certification has the option to delay replanting until the issuance of the revised Guidelines for the guidelines. Additional guidance for alternative commodity crops and rehabilitation of natural vegetation will be regulated by the PLWG.

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). - Critical (Major) compliance -</p>	<p>According to soil map semi detail scale 1:50,000 and also verified during field visit, confirmed that there is no peat soil at area Bungo Tebo Estate and Plasma. Therefore, this indicator is not applicable.</p>	Not Applicable
7.7.7	<p>(C) All peat areas not planted and reserved in managed areas (regardless of depth) are protected as 'peatland conservation areas'; unit of certification are prohibited from constructing drainage channels, building roads and new electricity lines on peatlands; unless if it is for a non- corporate land clearance. Peatlands are managed in accordance with 'RSPO Best Management Practices for the Management and Rehabilitation of Natural Vegetation related to Oil Palm Cultivation that already exists in Peatlands' (the latest version) along with relevant audit guidelines. - Critical (Major) compliance -</p>	<p>According to soil map semi detail scale 1:50,000 and also verified during field visit, confirmed that there is no peat soil at area Bungo Tebo Estate and Plasma. Therefore, this indicator is not applicable.</p>	Not Applicable
Criteria 7.8: Practices maintain the quality and availability of surface and groundwater.			
7.8.1	<p>A water management plan is available and is implemented to support efficient use of water sources and continuous availability and avoid negative impacts on other users in the catchment. The plan referred to contains the following matters: - Minor compliance - 7.8.1a The unit of certification does not limit access to clean water or does not pollute the water used by the community.</p>	<p>There is no change in terms of the statement of conformity when comparing from the previous audit result. Up to now since previous assessment last year till the date of this audit, water management plan and procedure for water and soil conservation are in place. The company already conduct water analysis per semester where the last one was conducted on 19 August – 13 September 2022 by PT ITEC Solution Indonesia. Analysis report D.08.1432-1/LHU/2022 dated 13 September 2022 shown that water quality complies with national regulation (PP No 22/2021). This conclude that the company does not pollute the water used bythe community. Besides that, the riparian area is well maintained where in 50 m on the left and right side of riparian buffer zones, agrochemical application is</p>	Complied

		<p>prohibited, used manual fertilizer application and river bank planted with erosion barrier crop.</p> <p>Scheme Smallholders: The soil and water conservation in form of maintain soft weed by selective spraying (team TUS). The soft weed for natural cover crop – in order to maintain micro-climate and minimize surface run-off.</p> <p>Management of Plasma Bungo Tebo has issued the policy of prohibition of chemical application in riparian area according to "Memorandum No.02/EST- KLO/MEMO/X/17 dated 2 October 2017". Policy stated that to achieve the sustainable palm oil management in Plasma Bungo Tebo, Plasma Management prohibit the chemical application at riparian area 3 m at left and right side of river.</p>	
	<p>7.8.1b Workers have adequate access to clean water.</p>	<p>PT Rigunas Agri Utama provides clean water ground water (drilled well) for workers for Bungo Tebo Estate and clean water from Mill for Mill workers Housing. Regular water analysis was performed to monitor the water quality. Water analysis performed by accredited laboratory PT ITEC Solution Indonesia. Sample seen on analysis report D.08.1432-1/LHU/2022 dated 13 September 2022 shown that water quality is complies with national regulation (PermenKes No. 492/MENKES/PER/IX/2010).</p>	
<p>7.8.2</p>	<p>(C) Water courses and wetlands are protected, including the maintenance and restoration of riparian zones and other buffer zones during or before replanting, in accordance with the "RSPO Manual on BMPs for the management and rehabilitation of riparian reserves" (April 2017) or Simplified Guide Management and Rehabilitation of Riparian Reserves (2018). - Critical (Major) compliance -</p>	<p>There is no change in terms of the statement of conformity when comparing from the previous audit result. Up to now since previous assessment last year till the date of this audit, riparian area is protected.</p> <p>Each river determined the riparian zone 50 m on the left and right side the river with wide < 12m and 100 m for the river which wide >12 m. All riparian zone was sign by boundary poles and signboard. Riparian restoration performed in the critical/degraded area to enhance and rehabilitate theecosystem. When the replanting activity performed, it was prohibited to conducted land preparation/clearing in riparian area.</p> <p>Scheme Smallholders:</p>	<p>Complied</p>

		<p>The soil and water conservation in form of maintain soft weed by selective spraying (team TUS). The soft weed for natural cover crop – in order to maintain micro-climate and minimize surface run-off.</p> <p>Management of Plasma Bungo Tebo has issued the policy of prohibition of chemical application in riparian area according to “Memorandum No.02/EST- KLO/MEMO/X/17 dated 2 October 2017”. Policy stated that to achieve the sustainable palm oil management in Plasma Bungo Tebo, Plasma Management prohibit the chemical application at riparian area 3 m at left and right side of river.</p>																																																										
<p>7.8.3</p>	<p>Mill effluent is managed according to applicable regulations. The quality of mill effluent discharged, especially BOD (Biochemical Oxygen Demand) is monitored in accordance with applicable regulations.</p> <p>- Minor compliance -</p>	<p>Effluent from Bungo Tebo Mill applied to plantation area as Land Application. Monitoring of effluent conducted in monthly period by PT Jambi Lestari International (KAN Accredited No : LP-1129-IDN). Analysis results for January – December 2022 are :</p> <table border="1" data-bbox="1093 770 1951 1351"> <thead> <tr> <th>No</th> <th>Month</th> <th>pH</th> <th>BOD₅</th> <th>COD</th> <th>BOD Threshold Value</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Jan</td> <td>7.57</td> <td>2,706.56</td> <td>8,420.39</td> <td rowspan="10">5,000</td> </tr> <tr> <td>2</td> <td>Feb</td> <td>8.50</td> <td>729.45</td> <td>2,737.35</td> </tr> <tr> <td>3</td> <td>March</td> <td>8.15</td> <td>1,252.56</td> <td>4,101.28</td> </tr> <tr> <td>4</td> <td>April</td> <td>7.35</td> <td>861,03</td> <td>3,248.82</td> </tr> <tr> <td>5</td> <td>May</td> <td>7.53</td> <td>1,837.92</td> <td>6,260.83</td> </tr> <tr> <td>6</td> <td>June</td> <td>7.82</td> <td>1,296.44</td> <td>3,930.79</td> </tr> <tr> <td>7</td> <td>July</td> <td>8.05</td> <td>3,836.70</td> <td>4,700.01</td> </tr> <tr> <td>8</td> <td>August</td> <td>7.78</td> <td>1,252.42</td> <td>3,817.13</td> </tr> <tr> <td>9</td> <td>September</td> <td>7.87</td> <td>1,300.85</td> <td>4,586.73</td> </tr> <tr> <td>10</td> <td>October</td> <td>7.53</td> <td>1,277.31</td> <td>3,846.23</td> </tr> </tbody> </table>	No	Month	pH	BOD ₅	COD	BOD Threshold Value	1	Jan	7.57	2,706.56	8,420.39	5,000	2	Feb	8.50	729.45	2,737.35	3	March	8.15	1,252.56	4,101.28	4	April	7.35	861,03	3,248.82	5	May	7.53	1,837.92	6,260.83	6	June	7.82	1,296.44	3,930.79	7	July	8.05	3,836.70	4,700.01	8	August	7.78	1,252.42	3,817.13	9	September	7.87	1,300.85	4,586.73	10	October	7.53	1,277.31	3,846.23	<p>Complied</p>
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7.8.4	<p>Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -</p>	<p>Bungo Tebo POM has recorded the mill water use per tonne FFB, includes monitoring of water usage for mill processing and domestic usage. Result of water usage monitoring is recorded under "Mill Operation Summary" year 2022, updated in December 2022. Also, record for January – December 2022.</p> <p>2022</p> <table border="1"> <thead> <tr> <th>Month</th> <th>Water use (M³)</th> <th>M³ / ton FFB</th> </tr> </thead> <tbody> <tr><td>January</td><td>22.570</td><td>1.37</td></tr> <tr><td>February</td><td>21.100</td><td>1.21</td></tr> <tr><td>March</td><td>27.180</td><td>1.29</td></tr> <tr><td>April</td><td>25.300</td><td>1.19</td></tr> <tr><td>May</td><td>24.560</td><td>1.29</td></tr> <tr><td>June</td><td>27.860</td><td>1.27</td></tr> <tr><td>July</td><td>32.400</td><td>1.17</td></tr> <tr><td>August</td><td>33.690</td><td>1.21</td></tr> <tr><td>September</td><td>32.880</td><td>1.14</td></tr> <tr><td>October</td><td>29.830</td><td>1.18</td></tr> <tr><td>November</td><td>26.570</td><td>1.12</td></tr> </tbody> </table>	Month	Water use (M ³)	M ³ / ton FFB	January	22.570	1.37	February	21.100	1.21	March	27.180	1.29	April	25.300	1.19	May	24.560	1.29	June	27.860	1.27	July	32.400	1.17	August	33.690	1.21	September	32.880	1.14	October	29.830	1.18	November	26.570	1.12	Complied
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Criteria 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised						
7.9.1	Plans to increase the efficiency of fossil fuel use and to optimize renewable energy are available, monitored and documented. - Minor compliance -	<p>PT Rigunas Agri Utama has shown the document a plan for improving efficiency of the use of fossil fuels and to optimizer renewable energy under document of "<i>Pemakaian Energi Pabrik Bungo Tebo 2021 - 2022</i>".</p> <p>Energy use records include accurate measurements of renewable energy use per tonnage of FFB processed. Fossil fuel usage recorded for operational purpose, including the efficiency analysis. Below are the fossil fuel usage and renewable energy usage by Bungo Tebo POM:</p> <p>January – December 2022:</p> <ul style="list-style-type: none"> - Total Shell and fiber usage: 36,789 ton - Total fossil fuel usage: 108,721 Litres - Total energy generated from renewable energy: 0.596 Giga Joule per ton CPO - Total energy generated from fossil fuel: 0.014 Giga Joule per ton CPO - Fossil fuel substitute (converted) by renewable energy: 9,058,345 Litres 			Complied	
Criteria 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.						

<p>7.10.1</p>	<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>- Critical (Major) compliance -</p>	<p>There is no change in term of the statement of conformity when comparing from the previous audit result. Up to now since previous assessment last year till the date of this audit, plan to reduce GHG emissions in PT Rigunas Agri Utama – Bungo Tebo and supply bases are in place.</p> <p>Currently company has implemented:</p> <ul style="list-style-type: none"> - Avoidance planting on high carbon stock area: planting oil palm on mineral soil (land suitability report); Bungo Tebo Estate conserve all riparian area at Lalo river, Pinang river, Belangkai Purun, Rotan river, Benanai, Belangkai, Belangkai Purun, Benanai Pul river. - Reducing use of fossil fuel; Bungo Tebo POM has use 100% fibre and most of shell as a boiler fuel; Replace the generator set usage for electricity by PLN to reduce the diesel fuel. - Implementing zero burning policy: replanting with mechanical method, no burning evident during field visit; <p>The company has calculated the GHG emission through RSPO PalmGHG calculator, the details can be seen in Appendix B of this report.</p>	<p>Complied</p>
<p>7.10.2</p>	<p>(C) Since 2014, an estimate of carbon stocks in the proposed development area has been carried out along with potential sources of emissions that can occur directly as a result of the development and plans to minimize these emissions are prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <p>- Critical (Major) compliance -</p>	<p>There is no change in term of the statement of conformity when comparing from the previous audit result. Up to now since previous assessment last year till the date of this audit, no new planting in certified area of PT Rigunas Agri Utama – Bungo Tebo.</p> <p>Replanting has been performed by Bungo Tebo Estate since 2016 and completed in 2019.</p>	<p>Complied</p>
<p>7.10.3</p>	<p>(C) Other significant pollutant identification results are available and plans to reduce or minimize them are implemented and monitored.</p> <p>- Critical (Major) compliance -</p>	<p>PT Rigunas Agri Utama – Bungo Tebo POM has identified the significant pollutants and greenhouse gas (GHG) emissions. Significant pollutants and GHG such as: Emission, particulate, noise from boiler and generator, effluent from mill wastewater, fertilizer application, chemical applicator and transport of FFB.</p>	<p>Complied</p>

		<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>	
<p>Criteria 7.11: Fire is not used for preparing land and is prevented in the managed area.</p>			
<p>7.11.1</p>	<p>(C) Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance -</p>	<p>Procedure of Replanting was documented in SOP AA-APM-OP-1100.20-R6 dated 16 February 2017. The procedure described the company commitment to “Zero Burning” by using chipping and stacking using excavator by bucket modification. Procedure of replanting mentioned that Field Assistant, Head Assistant and Estate Manager must perform checks to ensure that the contractor does not perform burning for land preparation for replanting. In the procedure of replanting mentioned that, the methods used are: Toppling trees using heavy equipment (excavators); Chipping: cutting palm trunk, so as not infected with Ganoderma; Planting LCC, so that the decay of the old oil palm trunks can be faster; Planting of oil palm. This method has been used in replanting the whole plantation belonging to Asian Agri group including PT RAU – Bungo Tebo Estate.</p> <p>The company has established Based on field observation, it was evident that no fire has been used for replanting in Bungo Tebo Estate.</p> <p>Scheme Smallholder</p> <p>There are ongoing land preparation for replanting in sampled smallholder. It was observed there are company representatives (Replanting Foreman) that monitored the land preparation by contractor o in accordance with company policy and procedure.</p> <p>No fire has been used for replanting in scheme smallholder plots.</p>	<p>Complied</p>

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<p>7.11.2</p>	<p>The unit of certification establishes fire prevention and control measures for lands that are directly managed by the unit of certification.</p> <p>- Minor compliance -</p>	<p>There is no change in term of the statement of conformity when comparing from the previous audit result. Up to now since previous assessment last year till the date of this audit, firefighting facilities and procedure are in place.</p> <p>The activity of fire prevention and control present in "Laporan Pencegahan Pencemaran dan atau Kerusakan Lingkungan Hidup yang Berkaitan dengan Kebakaran Lahan" for period 2022. Report of fire prevention and control are submitted to related authority (Dinas Lingkungan Hidup & Dinas Perkebunan) each semester, for example report for Semester 2 Y2022 was reported in January 2023.</p>	<p>Complied</p>
<p>7.11.3</p>	<p>The unit of certification engages stakeholders in adjacent locations for fire prevention and control measures.</p> <p>- Minor compliance -</p>	<p>PT RAU Bungo Tebo has a programme namely "Desa Bebas Api / Fire Free Village Programme (FFVP). The MoU regarding "Desa Bebas Api" Program has been signed with Tuo Sumay Village, Teriti Village, Suo-Suo Village, Muara Sekalo Village and Semambu Village on 9 June 2021. PT RAU recognize this engagement program, comprises the following segments:</p> <ol style="list-style-type: none"> a. Increase community awareness. Company conduct intensive communication with the local community to increase awareness on the impact of fire and haze on health. b. Empowerment village head. During the dry season, villages play a significant role to synergize the prevention and mitigation of land fire. c. Provide support for land clearing. d. Appreciation for zero burning. e. Assistance to enhance local economy. <p>The activity of fire prevention and control present in "Laporan Pencegahan Pencemaran dan atau Kerusakan Lingkungan Hidup yang Berkaitan dengan Kebakaran Lahan" for period 2022. Report of fire prevention and control are submitted to related authority (Dinas Lingkungan Hidup & Dinas Perkebunan) each semester, for example report for Semester 2 Y2022 was reported in January 2023.</p>	<p>Complied</p>

Criteria 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.

PROCEDURAL NOTE for 7.12:

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

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

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

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

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

7.12.1	<p>(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCV or HCS forests.</p> <p>Historical analysis of Land Use Change Analysis (LUCA) is carried out before any new land clearing, in accordance with the RSPO LUCA Guidance document (see indicator 7.12.2).</p> <p>- Critical (Major) compliance -</p>	<p>No new planting after November 2005. PT Rigunas Agri Utama - Bungo Tebo has been planted since 1994, 1995 and 1996. Even though from the planting year, there was planting year 2008, it was known that the 512 Ha planted in 2008 was replanting oil palm due to low SPH (Stand per Hectare) caused by elephant attack, during early stage of planting.</p> <p>Replanting has been performed by Bungo Tebo Estate since 2016 and finished in 2019. Total replanting in 2016 was 295 ha, in 2017 was 449 ha, in 2018 was 447 ha and 2019 was 787 ha.</p> <p>This indicator is not applicable since there is no new planting after 2005 in PT Rigunas Agri Utama – Bungo Tebo Estate and Scheme Smallholder.</p>	Complied
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<p>7.12.2</p>	<p>(C) HCV and HCS forests, and other conservation areas are identified as follows:</p> <ul style="list-style-type: none"> - Critical (Major) compliance - <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>During this surveillance audit, there is no changing on HCV assessment information from the previous audit.</p> <p>Company including scheme smallholder has conducted HCV identification in coordination with Faculty of Forestry from IPB (Bogor Agricultural University).</p> <p>The identification result recorded and reported under "Laporan Akhir Identifikasi Keberadaan Nilai Konservasi Tinggi (NKT) di areal PT Rigunas Agri Utama, Kabupaten Tebo". The scope of study covers nucleus estate of PT Rigunas Agri Utama plantation (covers 2,551 Ha) and smallholder estate/plantation (covers 5,914 Ha), located in Sumay District, Rambai District and Serai Serumpun District. The HCV identification was using Guidance on Identification of HCV in Indonesia, published by "Konsorsium Revisi HCV Toolkit Indonesia", July 2008.</p> <p>The assessor of HCV consist of:</p> <ul style="list-style-type: none"> - Dr. Ir. H. Nyoto Santoso, MS.: Team Leader, listed as RSPO HCV Assessor (listed as Provisionally Licensed Assessor, dated 23 April 2015); - Udi Kusdinar, S.Hut.: Social and Cultural aspects, listed as RSPO HCV Assessor. - Sulfan Ardiansyah, S.Hut.: Flora Ecology and Environmental Services, listed as RSPO HCV Assessor. - M. Syayidina Ali, Amd.: GIS (listed as Provisionally Licensed Assessor, dated 23 April 2015). - Gilang Prastya Pambudi, S.Hut.: Social-cultural aspect, listed as RSPO HCV Assessor. <p>The HCV identification survey was carried out on 23 – 27 April 2013. The involvement of interested parties in form of interview, discussion and/or public consultation. For example: Discussion with authorities of Serai Serumpun district, interview with Pinang Belai Village, discussion with villagers of Sekutur Jaya Village, interview with committee of KUD Sumai</p>	<p>Complied</p>
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		<p>Makmur, interview with Sumay District public servants, interview with villagers of Sungai Rambai Vilage, etc.</p> <p>The public consultation was carried out on 26 April 2013, located in “Balai Kecamatan Serai Serumpun”, which attended by 28 participants, representing village authorities, villagers, elderly and community figures, district head and KUD Plasma.</p> <p>Company has in cooperation with community for the management of HCV, as written in Statement “Pernyataan Bersama” signed by PT Rigunas Agri Utama’ s management, six (6) village heads and 9 leaders of KUD. The statement was stating commitment towards: to protect wildlife inside the scheme smallholder plantation SP1 – SP7, and agreed to no–hunting policy; Community agreed to stop the use of poison and electricity to catch fish; To protect river buffer zone through: no chemical fertilizer application, using organic fertilizer, to plant river buffer zone with local species tree – and to nurture/maintain the tree; no use of open-fire in scheme smallholder plantation; to actively participate in electric fence program to drive away elephant; to communicates the policy to communities. The statement was signed on 26 April 2013 by all representatives.</p>	
	<p>7.12.2 b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the latest HCSA Toolkit and HCV-HCSA Assessment Manual that is applicable at the time of the assessment. This includes stakeholder consultation and take into account wider landscape- level consideration.</p>	<p>HCV identified in Bungo Tebo Estate (17.59 ha) consist of:</p> <ul style="list-style-type: none"> - HCV 1.2, HCV 4.1 in Riparian area Lalo river, Pinang river, Belangkai Purun, Rotan river, Benanai, Belangkai, Belangkai Purun, Benanai Bul river with area 17.54 Ha. - HCV 6, graveyard in Division III area, 0.05 Ha. <p>HCV identified in Bungo Tebo Plasma/scheme smallholder consist of:</p> <ul style="list-style-type: none"> - HCV 1.2 and 4.1 in Riparian area of river Kebung, Lawai, Sukorejo, Sekutur, Lalo, Benanai, Benanai Bul, Belangkai, Cenio, Anak Batang Sumay with area 52.04 ha. The HCV area was located in surrounding scheme smallholder plantation and outside of smallholder plots/block. 	

		<p>RTE species identified in area Bungo Tebo Estate and Plasma are as follows:</p> <ul style="list-style-type: none"> - Kucing kuwuk (<i>Prionailurus bengalensis</i>) - Lutung (<i>Presbytis melalophos</i>) - Lutung abu – abu (<i>Trachypithecus cristatus</i>) - Berang-berang (<i>Prionodon linsang</i>) - Gajah (<i>Elephas maximus</i>) - Pijantung kecil (<i>Arachnotera longirostra</i>) - Raja udang meninting (<i>Alcedo meninting</i>) - Elang hitam (<i>Ictinaetus malayensis</i>) - Burung madu kelapa (<i>Anthreptes malaccensis</i>) - Elang ular bido (<i>Spilornis cheela</i>) - Kipas belang (<i>Rhipidura javanica</i>) - Cekakak belukar (<i>Halcyon smirnenensis</i>) - Cekakak sungai (<i>Halcyon chloris</i>) - Burung madu sepah raja (<i>Aethopyga siparaja</i>) <p>There is no new land clearing (in existing plantations or new plantings) after 15 November 2018.</p> <p>PT Rigunas Agri Utama Bungo Tebo has been planted since 1994, 1995 and 1996.</p> <p>Replanting has been performed by Bungo Tebo Estate since 2016 and finish in 2019. Total replanting in 2016 was 295 ha, in 2017 was 449 ha and in 2018 was 447 ha, and 2019 was 787 ha. The rest planted area 512 Ha planted in 2008 was also replanting oil palm due to low SPH (Stand per Hectare) caused by elephant attack, during early stage of planting.</p>	
7.12.3	<p>(C) In High Forest Cover Landscapes (HFCLs) within HFCCs, a specific procedure will apply for legacy cases and development by indigenous peoples and local communities with legal or customary rights, taking</p>	<p>According to HCV assessment on April – May 2013 it was confirmed that there is no High Forest Cover Landscapes (HFCLs) identified in the</p>	Not Applicable

	<p>into consideration regional and national multi-stakeholder processes. Until this procedure is developed and endorsed, 7.12.2 applies.</p> <p>- Critical (Major) compliance -</p>	<p>concession area of PT Rigunas Agri Utama and Scheme Smallholder. It was also confirmed during onsite audit.</p> <p>This indicator is not applicable.</p>	
<p>PROCEDURAL NOTE for 7.12.3: Indicator 7.12.3. is not relevant to Indonesia, until further decisions by the RSPO.</p>			
<p>7.12.4</p>	<p>(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An Integrated management plans to protect and/or enhance HCV and HCS forests, peatland and other conservation areas are developed, implemented and adapted if necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan was developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>- Critical (Major) compliance -</p>	<p>PT Rigunas Agri Utama - Bungo Tebo has been planted since 1994, 1995 and 1996. Replanting has been performed by Bungo Tebo Estate since 2016 and finished in 2019. Total replanting in 2016 was 295 ha, in 2017 was 449 ha, in 2018 was 447 ha and 2019 was 787 ha.</p> <p>Company has prepared Conservation Management Plan 2022/2023, detailing location of HCV area, hectare of HCV area, management objective, management program, method, person in charge, target of implementation and monthly status. Company has consistently monitors the status of HCV area, as well as protected flora and fauna species. This is recorded in "Laporan Monitoring Tumbuhan dan Satwa Liar PT Rigunas Agri Utama" period Semester I & II 2022. Monitoring period January – December 2022. The report explains the monitoring on status of plant and wildlife, disturbance and damage to the protected area.</p> <p>Wildlife observations are conducted monthly by Mandor HCV in each Afdeling. Observation result since January to December 2022 and January - September 2021 documented in the "Daftar Temuan satwa liar di areal kebun PT Rigunas Agri Utama". Based on monitoring result since January – December 2020 and January – June 2021, there were still found the RTE species consist of:</p> <p>Aves: Kipasan belang (<i>Rhipidura javanica</i>), Cekakak belukar (<i>Halcyon smyrnensis</i>), Cekakak sungai (<i>Todirhamphus chloris</i>), Perenjak Jawa (<i>Prinia familiaris</i>), Raja udang menitng (<i>Alcedo meninting</i>).</p> <p>Mamalia: Monyet ekor panjang (<i>Macaca fascicularis</i>), Babi (<i>Sus crofa</i>).</p> <p>Reptil: Biawak (<i>Varanus salvator</i>).</p>	<p>Complied</p>

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		<p>Monitoring of animal/wildlife was conducted in the location:</p> <ul style="list-style-type: none"> - Riparian Belangkai Purun Block C94D, C96J, – Division III - Riparian Lalo Block A94K – Division I - Riparian Pinang Block A16B – Division I - Riparian Rotan Block B95i – Division II - Riparian Belangkai 0 Block C17c – Division III - Riparian Benanai Block C17C – Division III <p>Report of management and monitoring are reported to Balai Konservasi Sumberdaya Alam Provinsi Jambi each semester.</p> <p>HCV identified in Bungo Tebo Plasma/scheme smallholder consist of: HCV 1.2 and 4.1 in Riparian area of river Kebung, Lawai, Sukorejo, Sekutur, Lalo, Benanai, Benanai Bul, Belangkai, Cenio, Anak Batang Sumay with area 52.04 ha. The HCV area was located in surrounding scheme smallholder plantation and outside of smallholder plots/block. So, no HCV Area monitoring needed in scheme smallholder.</p>	
<p>7.12.5</p>	<p>Where rights of local communities have been identified in HCV areas and HCS forest after 15 November 2018, peatland and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p> <p>- Minor compliance -</p>	<p>According to HCV assessment on April – May 2013 it was confirmed that there is no HCV identified in the land of local communities. It was also confirmed during onsite audit.</p> <p>This indicator is not applicable.</p>	<p>Not Applicable</p>
<p>7.12.6</p>	<p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual</p>	<p>Based on document verification upon “Laporan hasil monitoring Pengelolaan Tumbuhan dan Satwa” period Semester I & II 2022 shows in the area of Bungo Tebo Estate identified 6 types of protected under IUCN and CITES. Report of HCV management and monitoring semester I & II year 2022 has been submitted to BKSDA Provinsi Jambi. Evidence of report submission can be shown during audit.</p>	<p>Complied</p>

	<p>working for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p>- Minor compliance -</p>	<p>Bungo Tebo Estate also has monitoring the RTE species each month as present in "Daftar Temuan Satwa Liar di Areal Kebun PT Rigunas Agri Utama". Based on monitoring result since January – December 2022 there were still found the RTE species consist of:</p> <p>Aves: Kipasan belang (<i>Rhipidura javanica</i>), Cekakak belukar (<i>Halcyon smyrnensis</i>), Cekakak sungai (<i>Todirhamphus chloris</i>), Perenjak Jawa (<i>Prinia familiaris</i>), Raja udang meninting (<i>Alcedo meninting</i>).</p> <p>Mamalia: Monyet ekor panjang (<i>Macaca fascicularis</i>), Babi (<i>Sus crofa</i>).</p> <p>Reptil: Biawak (<i>Varanus salvator</i>).</p> <p>Monitoring of animal/wildlife was conducted in the location:</p> <ul style="list-style-type: none"> - Riparian Belangkai Purun Block C94D, C96J, – Division III - Riparian Lalo Block A94K – Division I - Riparian Pinang Block A16B – Division I - Riparian Rotan Block B95i – Division II - Riparian Belangkai 0 Block C17c – Division III - Riparian Benanai Block C17C – Division III <p>Company also installed identity signboard and warning signboard to educate the workforce and surrounding community regarding the protection of RTE species.</p> <p>Socialization of HCV and RTE species protection has been carried out by the company both to internal company employees and to the surrounding community. Evidence of socialization can be shown. The company also posted information boards and appeals regarding the protection of local protected areas, a ban on hunting for animals and destroying areas and other conservation campaigns.</p>	
7.12.7	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p>	<p>There is no new planting after November 2005.</p> <p>PT Rigunas Agri Utama Bungo Tebo has been planted since 1994, 1995 and 1996. Even though from the planting year, there was planting year 2008. Based on document verification, field visit and interview with</p>	<p>Non-compliance</p>

<p>- Minor compliance -</p>	<p>stakeholders, it was known that the 512 Ha planted in 2008 was replanting oil palm. The replanting occurred due to low SPH (Stand per Hectare) caused by elephant attack, during early stage of planting.</p> <p>Replanting has been performed by Bungo Tebo Estate since 2016 and finished in 2019. Total replanting in 2016 was 295 ha, in 2017 was 449 ha, in 2018 was 447 ha and 2019 was 787 ha.</p> <p>Company including scheme smallholder has conducted HCV identification in coordination with Faculty of Forestry from IPB (Bogor Agricultural University) in April – May 2013.</p> <p>Company has prepared Conservation Management Plan 2022/2023, detailing location of HCV area, hectare of HCV area, management objective, management program, method, person in charge, target of implementation and monthly status. Company has consistently monitored the status of HCV area, as well as protected flora and fauna species. This is recorded in "Laporan Monitoring Tumbuhan dan Satwa Liar PT Rigunas Agri Utama" period Semester I & II 2022. The report explains the monitoring on status of plant and wildlife, disturbance and damage to the protected area.</p> <p>Wildlife observations are conducted monthly by Mandor HCV in each Afdeling. Observation result since January to December 2022 and documented in the "Daftar Temuan satwa liar di areal kebun PT Rigunas Agri Utama". Based on monitoring result since January – December 2022, there were still found the RTE species consist of:</p> <p>Aves: Kipasan belang (<i>Rhipidura javanica</i>), Cekakak belukar (<i>Halcyon smyrnensis</i>), Cekakak sungai (<i>Todirhamphus chloris</i>), Perenjak Jawa (<i>Prinia familiaris</i>), Raja udang meninitng (<i>Alcedo meninting</i>).</p> <p>Mamalia: Monyet ekor panjang (<i>Macaca fascicularis</i>), Babi (<i>Sus crofa</i>).</p> <p>Reptil: Biawak (<i>Varanus salvator</i>).</p> <p>Monitoring of animal/wildlife was conducted in the location:</p> <ul style="list-style-type: none"> - Riparian Belangkai Purun Block C94D, C96J, – Division III 	
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		<ul style="list-style-type: none"> - Riparian Lalo Block A94K – Division I - Riparian Pinang Block A16B – Division I - Riparian Rotan Block B95i – Division II - Riparian Belangkai 0 Block C17c – Division III - Riparian Benanai Block C17C – Division III <p>Minor non conformances : The status of HCV area determined by PT RAU Bungo Tebo was not well monitored.</p>	
7.12.8	<p>(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV- HCSA assessment since 15 November 2018, the Remediation and Compensation Procedures (RaCP) applies.</p> <p>- Critical (Major) compliance -</p>	<p>There is no new planting after November 2005.</p> <p>PT Rigunas Agri Utama Bungo Tebo has been planted since 1994, 1995 and 1996. Even though from the planting year, there was planting year 2008. Based on document verification, field visit and interview with stakeholders, it was known that the 512 Ha planted in 2008 was replanting oil palm. The replanting occurred due to low SPH (Stand per Hectare) caused by elephant attack, during early stage of planting.</p> <p>Replanting has been performed by Bungo Tebo Estate since 2016 and finished in 2019. Total replanting in 2016 was 295 ha, in 2017 was 449 ha, in 2018 was 447 ha and 2019 was 787 ha.</p> <p>This indicator is not applicable since there is no new planting after 2005 in PT Rigunas Agri Utama – Bungo Tebo Estate and Scheme Smallholder</p>	Not Applicable

Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2022** for **Bungo Tebo POM** and supply base was calculated using the PalmGHG Calculator version 3.0.1. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in **2022** for **Bungo Tebo POM** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	2.35
PKO	2.35

Extraction	%
OER	20.46
KER	5.29

Production	t/yr
FFB Process	267,453
CPO Produced	54,723
PKO Produced	14,145

Land Use	Ha
OP Planted Area	8,404
OP Planted on peat	0.0
Conservation (forested)	0.0
Conservation (non-forested)	37.0
Total	8,404

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	24,592.81	0.48	0.00	0.00	0.00	0.00	24,592.81	0.48
CO ₂ Emission from fertilizer	509.30	0.01	1,090.39	0.01	0.00	0.00	1,599.70	0.02
NO ₂ Emission	167.46	0.00	0.00	0.00	0.00	0.00	167.46	0.00
Fuel Consumption	812.37	0.02	1,490.57	0.02	0.00	0.00	2,302.94	0.04
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sink								
Crop Sequestration	-23,310.72	-0.45	0.00	0.00	0.00	0.00	-23,310.72	-0.45
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	2,771.22	0.05	2,580.96	0.03	130,602.60	0.00	135,954.78	0.00

**Note: Includes both estates and smallholders*

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	54,607.37	0.20
Fuel Consumption	509.81	0.00
Grid Electricity Utilization	0.00	0.00
Credit		
Export of Grid Electricity	-0.20	0.00
Sales of PKS	-29,119.20	-0.11
Sales of EFB	0.00	0.00
Total	25,997.79	0.10

Summary of Kernel Crusher Emission and Credit (if applicable)

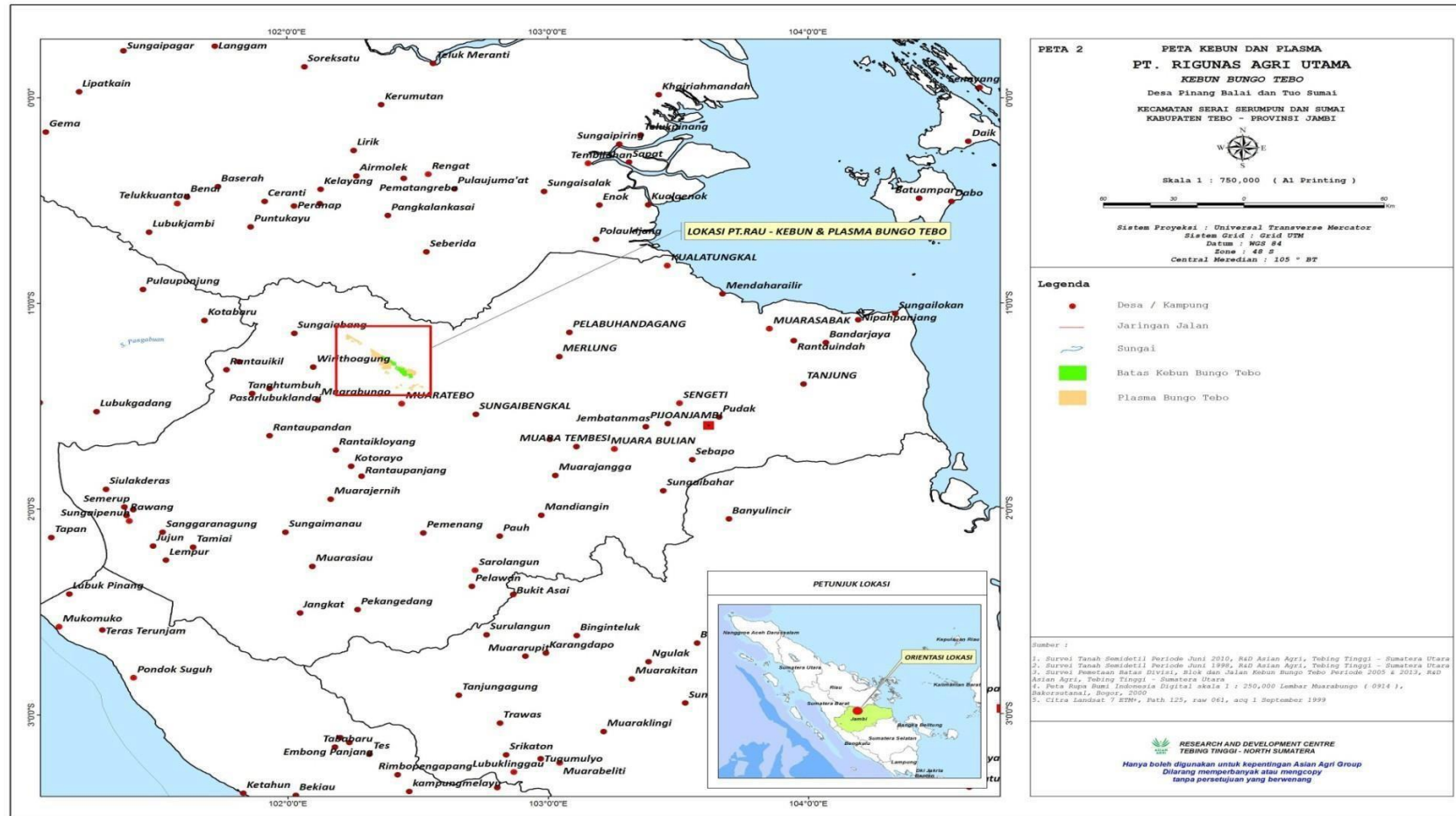
Emissions	tCO ₂ e
PK from own mill	33,213.97
PK from other source	0.00
Fuel Consumptions	0.00
Total Crusher emissions	33,213.97

*This mill has no kernel crusher operation.

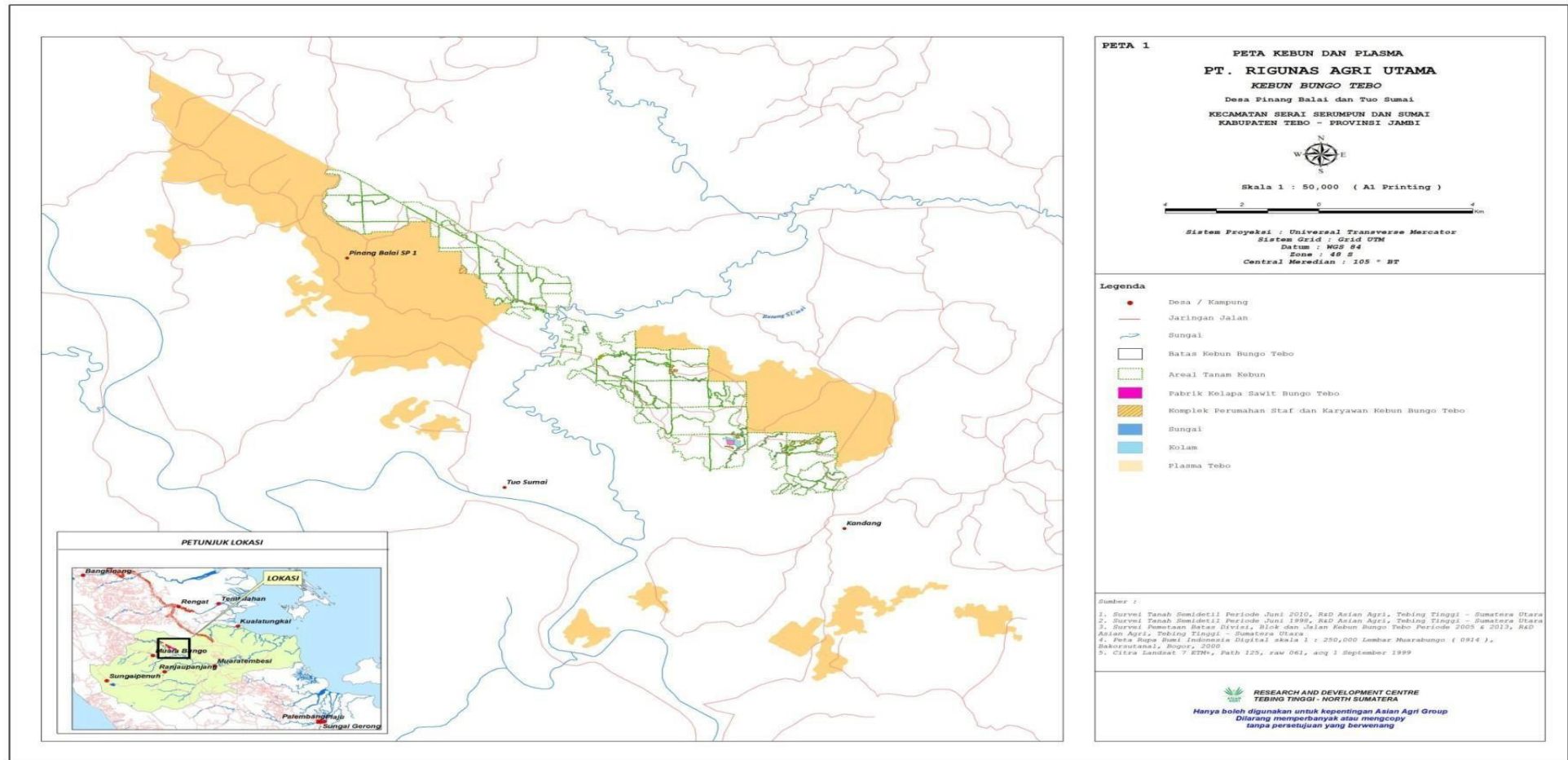
Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	0
Divert to anaerobic diversion (%)	100

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

Appendix C: Location Map of Certification Unit and Supply bases



Appendix D: Estate Field Map



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Appendix E: List of Smallholder Registered and/or sampled

No	Name of farmer	Location (Village)	Plot Number	GPS Reference		Area Summary (Ha)		Forecasted annual FFB Production (MT)	Date of joining	Smallholder ID
				Latitude (N)	Longitude (E)	Total Certified Area	Planted Area			
Koperasi Tanjung Dani Sakti										
1	Dayat		599							
2	Zamhari		600							
3	Dani		607							
4	Viki		642							
5	Arbayani		643							
6	M. Ansori		630							
7	Rahmawati		664							
8	Ilham		646							
9	Rasiban Hartono		649							
10	F Sianipar		651							
11	Martono		534							
12	Ismail		535							
13	Nasrun		543							
Koperasi Sumber Usaha										
1	Ningsih		3319							
2	Mardiah		3320							
3	Kaspul		3321							
4	Mardiana		3334							
5	Halim		3335							
6	Lina Marliana		3336							
7	Bunyani		3337							
8	Rivaldo		3338							
9	Optopiarni		3339							
10	Adi		3340							
11	Ema Susanti		3322							
12	Yusup		3323							
KUD Barokah										
1	Sukur		612							
2	Derauh		613							
3	Jupri		623							
4	Ansori		589							
5	Muslim		565							
6	M. Hodi		584							
7	Selamet		585							

No	Name of farmer	Location (Village)	Plot Number	GPS Reference		Area Summary (Ha)		Forecasted annual FFB Production (MT)	Date of joining	Smallholder ID
				Latitude (N)	Longitude (E)	Total Certified Area	Planted Area			
8	A. Majid		605							
9	Jahari		665							
10	Husin Ali		666							
11	Mulyadi		697							
12	M. Nasir		2928							
13	Uwan J		2929							
14	M. Kamel		2939							
KUD Produsen Sawit Sumay Makmur										
1	Mustholih Rinda Putra		238							
2	Maryono		250							
3	Bomin		251							
4	Sarji		219							
5	Mulyono		221							
6	Damono		227							
7	Agustian		228							
8	Abdul Muzib		229							
9	Sugiono		230							
10	Sutikno		255							
11	Qoirul Anwar		188							
12	Hendra Yulianto		213							
13	Waridi		217							
14	Djuritanto		430							
15	Mustajab		182							
16	Harnowo		151							
17	Damono		152							
18	Tariono		168							
19	Sudiyanto		170							
20	Abdul Muzib		187							
Koperasi Sawit Bina Tani										
1	Bahrul		3250							
2	M. Reza		3244							
3	Febri		3249							
4	Febri		3254							
5	Simamora		3248							
6	J. Tumorang		3253							

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No	Name of farmer	Location (Village)	Plot Number	GPS Reference		Area Summary (Ha)		Forecasted annual FFB Production (MT)	Date of joining	Smallholder ID
				Latitude (N)	Longitude (E)	Total Certified Area	Planted Area			
7	Simamora		3247							
8	Sembiring		3252							
9	Dul Rohman		3258							
10	Karsum		3246							
11	Karsum		3251							
12	Suratman		3257							
				Total						
Note: * are smallholders sampled in this audit.										

Appendix F: List of Abbreviations

a.i	Active Ingredient
BOD	Biochemical Oxygen Demand
CB	Certification Bodies
CHRA	Chemical Health Risk Assessment
COD	Chemical Oxygen Demand
CPO	Crude Palm Oil
CSPO	Certified Sustainable Palm Oil
CSPKO	Certified Sustainable Palm Kernel Oil
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