

**RSPO PRINCIPLE AND CRITERIA –
4th ANNUAL SURVEILLANCE ASSESSMENT (ASA1_4)
Public Summary Report**

PT. Inti Indosawit Subur (RSPO Membership: 1-0022-06-000-00)
Client company Address: Jl. M.H Thamrin No. 31, Jakarta 10230, Indonesia
Certification Unit: UKUI 2 Palm Oil Mill and its supply base Location of Certification Unit: Village of Ukui, Sub-District of Ukui, Pelalawan Regency, Riau Province, Indonesia

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Section 1: Scope of the Certification Assessment

1. Company Details			
RSPO Membership Number	1-0022-06-000-00	Membership Approval Date	06/02/2006
Parent Company Name	PT. Inti Indosawit Subur		
Address	Head Office: Jl. MH. Thamrin No.31 Jakarta 10230, Indonesia		
Subsidiary (Certification Unit Name)	PT. Inti Indosawit Subur – Ukui 2 POM		
Address	Village of Ukui, Sub-District of Ukui, Pelalawan Regency, Riau Province, Indonesia		
Contact Name	Mr. Ivan Novrizaldie		
Website	www.asianagri.co.id	E-mail	ivan_novrizaldie@asianagri.com
Telephone	+62 21 230 1119	Facsimile	+62 21 230 1120

2. Certification Information			
Certificate Number	RSPO 565807	Date of First Certification	01/03/2011
		Certificate Start Date	01/03/2016
		Certificate Expiry Date	28/02/2021
Scope of Certification	Palm Oil and Palm Kernel Production of Ukui 2 Palm Oil Mill with Identity Preserved Supply Chain Module Two (2) Own estates: Soga Estate and Sei Lala Estate Six (6) smallholders: KUD Tani Subur; KUD Karya Tani; KUD Mekar Abadi; KUD Trani Maju; KUD Tani Bahagia and KUD Usaha Tani.		
Applicable Standards	RSPO Principles & Criteria for Sustainable Palm Oil Production: 2018; with Identity Preserved Supply Chain module.		

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
ID05/65250	ISO 14001:2015	SGS	10/06/2020
EU-ISCC-Cert-DE100-20442019	ISCC (Ukui 2 POM)	SGS	02/02/2020

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location [Map Reference #]	GPS Coordinates	
		Latitude (N/S)	Longitude (E/W)
Ukui-2 POM	Village of Ukui, Sub-District of Ukui, Pelalawan Regency, Riau Province	00° 16' 39.51" S	102° 07' 3.99" E
Soga Estate*	Ukui Dua village, Ukui Sub-District, Pelalawan Regency, Riau Province	00° 12' 47.18" S	102° 09' 13.61" E
Sei Lala Estate	Ukui village, Ukui Sub-District, Pelalawan Regency, Riau Province	00° 16' 39.51" S	102° 07' 3.99" E
KUD Tani Subur (390 smallholders)	Sei Beberas Hilir village, Lubuk Batu Jaya Sub-District, Indragiri Hulu Regency, Riau Province	00° 23' 09.5" S	102° 07' 52.8" E
KUD Karya Tani (367 smallholders)	Sei Beras Beras village, Lubuk Batu Jaya Sub-District, Indragiri Hulu Regency, Riau Province	00° 23' 14.8" S	102° 04' 58.7" E
KUD Mekar Abadi (287 smallholders)	Tasik Juang village, Lubuk Batu Jaya Sub-District, Indragiri Hulu Regency, Riau Province	00° 22' 37.3" S	102° 05' 01.0" E
KUD Trani Maju (481 smallholders)	Pontian Mekar village, Lubuk Batu Jaya Sub-District, Indragiri Hulu Regency, Riau Province	00° 20' 35.3" S	102° 05' 03.3" E
KUD Tani Bahagia (683 smallholders)	Kulim Jaya village, Lubuk Batu Jaya Sub-District, Indragiri Hulu Regency, Riau Province	00° 22' 50.1" S	102° 07' 31.0" E
KUD Usaha Tani (646 smallholders)	Air Putih village, Lubuk Batu Jaya Sub-District, Indragiri Hulu Regency, Riau Province	00° 18' 15.6" S	102° 07' 30.5" E

*Soga estate office is newly located (two months prior audit), so that not appeared in the map.

5. Description of Supply Base					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Soga	2,926	34	28	2,988	97.92
Sei Lala	3,064	82	32	3,178	96.41
Sub-Total A	5,990	116	60	6,166	97.16
KUD Tani Subur	780	0	0	780	100

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(390 smallholders)					
KUD Karya Tani (367 smallholders)	734	0	0	734	100
KUD Mekar Abadi (287 smallholders)	574	0	0	574	100
KUD Trani Maju (481 smallholders)	962	0	0	962	100
KUD Tani Bahagia (683 smallholders)	1,366	0	0	1,366	100
KUD Usaha Tani (646 smallholders)	1,292	0	0	1,292	100
Sub-Total B	5,708	0	0	5,708	100
Grand Total	11,698	116	60	11,874	99.29

6. Plantings & Cycle							
Estate	Age (Years)					Mature**	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Soga	0	0	1,644	1,087	195	2,926	0
Sei Lala	277	10	318	0	2,459	2,787	277
KUD Tani Subur	0	0	0	44	736	780	0
KUD Karya Tani	0	0	0	0	734	734	0
KUD Mekar Abadi	0	0	0	130	444	574	0
KUD Trani Maju	0	0	0	84	878	962	0
KUD Tani Bahagia	0	0	0	0	1,366	1,366	0
KUD Usaha Tani	0	0	0	0	1,292	1,292	0
Total (ha)	277	10	1,962	1,345	8,104	11,421	277

Note:

7. Certified Tonnage of FFB (Own Certified Scope)				
Estate	Tonnage / year			
	Estimated (Mar 2019 – Feb 2020)	Actual (Dec 2018 – Nov 2019)		Forecast (Mar 2020 - Feb 2021)
		Previous license period (Dec2018 – Feb2019)	Current license period (Mar2019 – Nov2019)	
Soga	129,588	22,253	55,682	124,728

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Sei Lala	19,139	14,610	53,885	22,011
KUD Tani Subur	17,014	5,015	13,233	18,658
KUD Karya Tani	15,659	4,771	12,413	17,570
KUD Mekar Abadi	11,649	3,950	10,400	14,672
KUD Trani Maju	21,029	6,656	17,139	24,329
KUD Tani Bahagia	31,422	9,253	24,905	34,925
KUD Usaha Tani	30,671	9,464	24,306	34,528
Total	276,171	75,972	211,963	291,421

Note:

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

Estate	Tonnage / year			
	Estimated (Mar 2019 – Feb 2020)	Actual (Dec 2018 – Nov 2019)		Forecast (Mar 2020 - Feb 2021)
	N/A	Previous license period (key in period covered)	Current license period (key in period covered)	N/A
Total				

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

Independent FFB Supplier	Tonnage / year			
	Estimated (Mar 2019 – Feb 2020)	Actual (Dec 2018 – Nov 2019)		Forecast (Mar 2020 - Feb 2021)
	N/A	Previous license period (key in period covered)	Current license period (key in period covered)	N/A
Total				

Note:

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10. Certified Tonnage				
Mill Capacity: 60 MT/hr SCC Model: IP	Estimated (mt) <i>(Mar 2019 – Feb 2020)</i>	Actual (mt) <i>(Dec 2018 – Nov 2019)</i>		Forecast (mt) <i>(Mar 2020 - Feb 2021)</i>
	FFB	FFB		FFB
	258,624	<i>Previous license period</i> (Dec2018 – Feb2019)	<i>Current license period</i> (Mar2019 – Nov2019)	291,421
		75,972	211,963	
	CPO (OER: 21.50%)	CPO (OER: 21.24%)		CPO (OER: 21.18%)
	58,963	16,136.45	45,020.94	61,746
	PK (KER: 5.50%)	PK (KER: 5.56%)		PK (KER: 5.60%)
	15,603	4,224.04	11,785.14	16,320
Note: previous volume estimate (license): CPO (55,604 MT); PK (14,224 MT). volume extension CPO 3,359 MT; CPK 1,379 MT.				

11. Actual Sold Volume (CPO) (March 2019-Nov 2019)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
CPO (MT)	9,474.63	26,857.06	0	0	36,331.69

12. Actual Sold Volume (PK) (March 2019-Nov 2019)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
PK (MT)	7,923.11	0	0	0	7,923.11

13. Actual Group certification Claims		
	Credit	Physical Volume (MT)
IS-CSPO	0	0
IS-CSPKO	0	0
IS-CSPKE	0	0

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn Bhd,
(ASI Accreditation Number: ASI-ACC-067)
Suite 29.01 Level 29, The Gardens North Tower,
Mid Valley City, Lingkaran Syed Putra,
59200 Kuala Lumpur, Malaysia.
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Representative: Nicholas Cheong (Nicholas.Cheong@bsigroup.com)
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BSI is a leading global provider of management systems assessment and certification, with more than 80,000 certified locations and clients in over 180 countries. BSI Standards 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 and an office at Jakarta and Australia which involve in RSPO Certification Program.

2.1 Assessment Methodology, Programme, Site Visits

The on-site 4th annual surveillance assessment (ASA-1.4) was conducted from **9-14 December 2019**. The audit programme is included as Appendix D. The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. Mill was audited together with the sample estates. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas and local communities.

The Major NC close out on-site assessment was conducted on **20 Feb 2020**. The audit programmes 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. RSPO Principles & Criteria 2018 and RSPO Supply Chain Certification Standard 2017 were used to guide the collection of information to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. The mill was audited together with the estates (or smallholders) of its supply base.

- The minimum sample size is four estates. Sample size for certification unit with more than four (4) estates were determined based on formula $N = (0.8\sqrt{y}) \times (z)$ where y is the number of estates and where z is the multiplier defined by risk assessment
- As for the smallholders, the sample were determined following the RSPO Management System Requirements and Guidance for Group Certification of FFB Production (2016). The sampling of smallholders were based on the formula $(0.8\sqrt{y}) \times (z)$; where y is total number of independent group member and where z is the multiplier defined by the risk assessment. The sampled smallholder listed in Appendix I.

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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 3.5.

All the previous nonconformities are remains closed. The assessment findings for the initial assessment/annual surveillance assessment are detailed in Section 3.4.

This report is structured to provide a summary of assessment finding as attached in the Appendix A. The assessment was based on random samples and therefore nonconformities may exist that have not been identified.

For Initial and Re-certification assessment, the report was externally reviewed by RSPO approved Certification 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 (2015) (Re-Certification)	Year 2 (2016) (ASA 1.1)	Year 3 (2017) (ASA 1.2)	Year 4 (2018)* (ASA 1.3)	Year 5 (2019) (ASA 1.4)
Ukui-2 POM	X	X	X	X	X
Soga Estate	X	X	X	X	X
Ukui Estate (Division V)	X	X	X	Not exist	
Sei Lala Estate	Not exist			X	X
KUD Tani Subur (390 smallholders)		X		X	
KUD Karya Tani (367 smallholders)		X		X	
KUD Mekar Abadi (287 smallholders)		X			X
KUD Trani Maju (481 smallholders)			X		X
KUD Tani Bahagia	X		X	X	

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(683 smallholders)				
KUD Usaha Tani (646 smallholders)	X		X	X

**sample of smallholders taken in ASA-1.3 year 2018 is changed due to information raised from stakeholder consultation.*

Tentative Date of Next Visit: December 7, 2020 - December 12, 2020

Total No. of Mandays: 24.5 mandays onsite

2.2 BSI Assessment Team:

Team Member Name	Role <i>(Team Leader or Team member)</i>	Qualifications <i>(Short description of the team members)</i>
Yudwi Wisnu Rahmanto (YR)	Team Leader	Bachelor of Forestry with majoring on Forest Silviculture. He worked at professional independent Certification Body as an Auditor for last 9 years and has involved in auditing activities with various certification schemes. Selected training which have been followed, such as RSPO Endorsed Lead Auditor Training Course, RSPO NEXT, ISPO Auditor/Lead Auditor Course, ISO 9001:2015, ISO 14001:2015; ISO 45001:2018, Implementation ISO 37001:2016, GIS-Basic Mapping and Spatial Analysis, Timber Legality Assurance System (SVLK), Verification Organization Training C.A.F.E Practices (Starbucks), UTZ Programme and others internal training programs. He has involved in auditing activities, such as Sustainable Forest Management by FSC FM/COC Scheme, Sustainable Palm Oil by RSPO and ISPO Scheme, Coffee And Farmer Equity (C.A.F.E Practices) Starbucks, Organic Standard (EU, NOP, JAS) for Coffee Farmers and Organic Exchange for Textile. During the assessment he assigned to verify legal and land dispute aspects.
Eko Purwanto (EP)	Team Member	He graduated as Bachelor of Forestry from Forest Conservation Department, Faculty of Forestry, Bogor Agricultural University (IPB) in 2001. He owned working experience at Oil Palm Plantation in East Kalimantan since 2003 to 2012, the last position was Estate Manager. He has implemented good agricultural practice including integrated pest management and limited pesticides uses. He has experience in auditing ISO 9001, ISPO, RSPO P&C and RSPO SCC with SAI Global since 2012 to 2017 as Lead Auditor and sometimes as Auditor. He joined BSI Group Indonesia in August 2017 as Auditor/Lead Auditor for ISO, ISPO, RSPO P&C and RSPO SCC (Client Manager/Tutor). He has been trained for lead auditor of RSPO P&C (2013), ISO 9001:2008 (2012), ISO 14001:2004 (2013), ISPO (2012) and RSPO SCC (2012). He has received refreshment training of RSPO P&C in May 2018 and RSPO SCC in March 2018. He has also completed training course of ISO 14001 (2012), Minaut (Oil and Automotive) Indonesia (2011) and Introduction to HCV Toolkit HCV (2011). Since October 2012 he has been involved in quality (ISO 9001) management system audits for very broad industrial and involved in Indonesia Sustainable Palm Oil (ISPO) and RSPO P&C audit for several plantations and mills, also RSPO Supply Chain audit for several KCP, Bulking and Refinery.

		During the assessment he assigned to verify best practice agronomy and mill aspects.
Mujinius Jalaraya (MJ)	Team Member	He hold Bachelor degree from Faculty of Forestry, Bogor Agricultural University (IPB) in 2008, Majoring in Forest Resources Conservation and Ecotourism. He has working experience in palm oil plantations as SHE Assistant at PT. Astra Agro Lestari Tbk in 2008 - 2012 and as Supervisor Sustainability at Teladan Prima Group in 2012 – 2014. He involved in RSPO certification since 2014 as a team member subsequently as a Lead Auditor. He has completed the training, such as: Lead Auditor ISO 9001: 2008 course, Lead Auditor ISPO course, Lead Auditor RSPO endorsed course, RSPO SCCS Lead Auditor endorsed course, HCV Identification and management, Internal Auditor ISO 14001: 2004 Training, Training for Trainers, OHS Expert Training, etc. He is fluently speaking in English and Bahasa Indonesia. During this assessment, he assessed on the aspects of Environmental and HCV management.
Edi Widodo (EW)	Team Member	Edy Widodo graduated as bachelor of the Faculty of Agriculture, Department of Agricultural Technology, University of Padjadjaran, Bandung. Earlier he worked as an Assistant Estates Manager in PT SMART Tbk. (1999 to 2005). He is the Lead Auditor for ISO 9001: 2008. He has working experience in the industrial sector and audit Plantation and also the processing industry and agricultural mechanization. He also the ISPO auditor who has obtained a certificate from the ISPO Commission, Ministry of Agriculture of Indonesia, on February 2013. He had got a certificate of training on Understanding ISO 14001: 2004 & Auditing ISO 14001: 2004 in 2013. He also had joined RSPO P&C training (2013) and also Course RSPO Lead Auditor 2016 - RSPO Endorsed RSPO Supply Chain Certification Training Course on April 2016. During this assessment, he assessed on the aspects of transparency, social, labor and stakeholder consultation
Andi P. Pasaribu (AP)	Team Member	Indonesian citizen. Bachelor degree, majoring social economy. He has several of work experiences (more than 5 years) as the operational staff since 2008. He has been followed the Training of Lead Auditor Indonesian Sustainable Palm Oil (ISPO) which was held by ISPO Commission in 2013 and Training of Lead Auditor Roundtable on Sustainable Palm Oil (RSPO) by Proforest and Daemeter in 2016. He has been attended several kinds of training, such as High Conservation Value (HCV) Training, Lead Auditor ISO 9001:2008, Lead Auditor ISO 14001:2005, auditor OHSAS, lead auditor RSPO supply chain by BMTRADA etc. He has some experiences of Sustainability Palm Oil scheme audit in Indonesian and Malaysia in best management practices, land legality, environmental, social and worker welfare aspect and supply chain. During this audit, he verify best management practices aspect.

Accompanying Persons: None

2.3 Assessment Plan

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

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Date	Time	Subjects	YR	MJ	EP	EW	AP
			PRSPOLA/SA	PRSPOLA/PRSPO-OHS/EMS	PRSPO-SCC/OHS/EMS	PRSPO-T-OHS/EMS/SA	
Mon, 9/12/2019	05.35 – 07.00	Flight Jakarta – Pekanbaru	√	√	√	√	√
	07.00 – 12.00	Travelling to Ukui-2 POM	√	√	√	√	√
	12.00 – 14.00	Lunch Break	√	√	√	√	√
	14.00 - 14.30	Opening meeting <ul style="list-style-type: none"> Auditee Speech (Introduction of PIC, Profile of Certified Management Unit) Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Transparency and Confidentiality Clarification) 					
	14.30 – 17.00	Document Review Soga Estate: <ul style="list-style-type: none"> Legal & Land Rights Social and Transparency Environmental, Waste Management & HCV Occupational Health & Safety Best Management Practices Worker Welfare Verification of Basic Information (Mill and supply bases) Review of previous assessment findings. 	√	√	√	√	√
Tue, 10/12/2019	08.00 – 12.00	Field visit to Soga Estate : <ul style="list-style-type: none"> Implementation of Agronomy Aspect Implementation of Environmental, Conservation and Waste Management Aspect Implementation of Occupational Health & Safety Aspect Implementation of Legal Aspect and Land Rights Consultation with external stakeholders (relevant government agencies), NGO and affected villages 	√	√	√	√	√
	08.00 –	<ul style="list-style-type: none"> Consultation with external stakeholders (relevant government agencies), NGO and affected villages 				√	
	12.00 – 14.00	Lunch Break	√	√	√	√	√

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Date	Time	Subjects	YR	MJ	EP	EW	AP
			PRSPOLA/SA	PRSPOLA/PRSPODHS/EMS	PRSPOSCC/OHS/EMS	PRSPOT-OHS/EMS/SA	
	14.00 – 17.00	Document Review Sei Lala Estate: <ul style="list-style-type: none"> - Legal & Land Rights - Social and Transparency - Environmental, Waste Management & HCV - Occupational Health & Safety - Best Management Practices - Worker Welfare - Review of previous assessment findings. 	√	√	√	√	√
Wed, 11/12/2019	08.00 – 12.00	Field visit to Sei Lala Estate : <ul style="list-style-type: none"> • Implementation of Agronomy Aspect • Implementation of Environmental, Conservation and Waste Management Aspect • Implementation of Occupational Health & Safety Aspect • Implementation of Legal Aspect and Land Rights • Consultation with external stakeholders (relevant government agencies), NGO and affected villages 	√	√	√	√	√
	12.00 – 14.00	Lunch Break	√	√	√	√	√
	14.00 – 17.00	Document Review Smallholders: <ul style="list-style-type: none"> - Legal & Land Rights - Social and Transparency - Environmental, Waste Management & HCV - Occupational Health & Safety - Best Management Practices - Worker Welfare - Review of previous assessment findings. 	√	√	√	√	√

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			PRSPOLA/SA	PRSPOLA/PRSPODHS/EMS	PRSPOLASCC/OHS/EMS	PRSPOLAT OHS/EMS/SA	
Thu, 12/12/2019	08.00 – 12.00	<p>Field observation to: KUD Usaha Tani (scheme Smallholders)</p> <p>Aspect to be observe:</p> <ul style="list-style-type: none"> • Implementation of Agronomy Aspect • Implementation of Environmental, Conservation and Waste Management Aspect • Implementation of Occupational Health & Safety Aspect • Implementation of Legal Aspect and Land Rights • Consultation with internal stakeholders (village head, cooperative management), local contractor (if any) <p>Sample taken :21 smallholders plot</p>	√	√	√	√	√
	12.00 – 14.00	Lunch Break	√	√	√	√	√
	14.00 – 17.00	<p>Field observation to: KUD Trani Maju (scheme Smallholders)</p> <p>Aspect to be observe:</p> <ul style="list-style-type: none"> • Implementation of Agronomy Aspect • Implementation of Environmental, Conservation and Waste Management Aspect • Implementation of Occupational Health & Safety Aspect • Implementation of Legal Aspect and Land Rights • Consultation with internal stakeholders (village head, cooperative management), local contractor (if any) <p>Sample taken: 18 smallholders plot</p>	√	√	√	√	√

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			PRSPOLA/SA	PRSPOLA/PRSPO-OHS/EMS	PRSPO-SCC/OHS/EMS	PRSPO-T-OHS/EMS/SA	
Fri, 13/12/2019	08.00 – 11.00	<p>Field observation to KUD Mekar Abadi (scheme Smallholders):</p> <p>Aspect to be observe:</p> <ul style="list-style-type: none"> • Implementation of Agronomy Aspect • Implementation of Environmental, Conservation and Waste Management Aspect • Implementation of Occupational Health & Safety Aspect • Implementation of Legal Aspect and Land Rights • Consultation with internal stakeholders (village head, cooperative management), local contractor (if any) <p>Sample taken: 14 smallholders plot</p>	√	√	√	√	√
	11.00 – 14.00	Lunch break	√	√	√	√	√
	14.00 – 17.00	<p>Field visit to Ukui-2 POM:</p> <ul style="list-style-type: none"> • BMP for Mill Processing – site visit • Occupational Health & Safety Aspect (Inspection to Chemical Storage, Hazardous Waste Storage, Fire Control Simulation, Processing Activities) • Implementation of Environmental and Waste Management Aspect (POME Pond, Empty Bunch Area, Reservoir/Intake Point, Biogas Plant – <i>if any</i>) • Consultation with internal stakeholders (gender committee, labor union), local contractor (if any) • Consultation with external stakeholder – Tesso Nilo National Park (visit) at Pangkalan Kerinci. <p>Supply Chain for CPO Mill (site visit) - FFB Receiving, Weighbridge, Dispatch CPO.</p>	√	√	√	√	√

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Date	Time	Subjects	YR	MJ	EP	EW	AP
			PRSP0-LA/SA	PRSP0-LA/PRSP0-OHS/EMS	PRSP0-SCC/OH S/EMS	PRSP0-T OHS/EMS/SA	
Sat, 14/12/2019	08.00 – 11.00	Supply Chain for CPO Mill (continued) Document Review UKUI-2 POM: <ul style="list-style-type: none"> - Legal & Land Rights - Social and Transparency - Environmental, Waste Management & HCV - Occupational Health & Safety - Best Management Practices - Worker Welfare - Review of previous assessment findings. 	√	√	√	√	√
	11.00 – 12.00	Closing Meeting	√	√	√	√	√

Section 3: Assessment Findings

3.1 Normative requirement applied for this assessment:

- PT. Inti Indosawit Subur Multiple Management Units / Time Bound Plan
- RSPO P&C 2018 Generic
- RSPO Group Certification Standard 2016
- RSPO Supply Chain Certification Standard 2017
- RSPO P&C National Interpretation _____

3.2 Time Bound Plan progress for multiple management units

Time Bound Plan		
Requirement	Remarks	Compliance
Does the plan include all current subsidiaries, estates and mills that is under the control of the holding company?	PT. Inti Indosawit Subur – Asian Agri Group 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.	Comply
Have all the estates and mills certified within five years after obtaining RSPO membership?	Based on Time Bound Plan revising in December 2018, Segati Mill (PT Mitra Unggul Pusaka) located in Pelalawan, Riau postponed to Re-Audit in year 2020. Status of RaCP and relevant issues are still in progress and waiting for RSPO feedback.	Comply
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three-year from the date of acquisition. Certification plan for the new acquisition shall be available.	No new acquisition.	Comply
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?	There is no changes from previous audit	Comply
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	No	Comply
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	No	Comply
Un-Certified Units or Holdings		
No replacement after dates defined in NIs Criterion 7.3: <ul style="list-style-type: none"> • Primary forest. • Any area required to maintain or enhance HCVs in 	Based on Time Bound Plan revising in December 2018, Segati Mill (PT Mitra Unggul Pusaka) located in Pelalawan, Riau postponed to Re-Audit in year 2020. Status	Comply

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accordance with RSPO P&C criterion 7.3.	of RaCP and relevant issues are still in progress and waiting for RSPO feedback.	
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	Based on Time Bound Plan revising in December 2018, Segati Mill (PT Mitra Unggul Pusaka) located in Pelalawan, Riau postponed to Re-Audit in year 2020. Status of RaCP and relevant issues are still in progress and waiting for RSPO feedback.	Comply
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 2.2, 6.4, 7.5 and 7.6. The RSPO RaCP tracker shall be checked to confirm for any land conflicts/Liabilities https://www.rspo.org/certification/remediation-and-compensation/racp-tracker . The progress on the Liabilities shall be verified and reported.	Based on Time Bound Plan revising in December 2018, Segati Mill (PT Mitra Unggul Pusaka) located in Pelalawan, Riau postponed to Re-Audit in year 2020. There is no liabilities for this management unit. Confirmation was obtained from RSPO on 10/06/2020.	Comply
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3.	Based on Time Bound Plan revising in December 2018, Segati Mill (PT Mitra Unggul Pusaka) located in Pelalawan, Riau postponed to Re-Audit in year 2020. Status of RaCP and relevant issues are still in progress and waiting for RSPO feedback	Comply
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	Based on Time Bound Plan revising in December 2018, Segati Mill (PT Mitra Unggul Pusaka) located in Pelalawan, Riau postponed to Re-Audit in year 2020. Status of RaCP and relevant issues are still in progress and waiting for RSPO feedback	Comply
Did the company conduct internal audit against the uncertified management units requirement? If yes, a positive assurance statement shall be available.	Based on Time Bound Plan revising in December 2018, Segati Mill (PT Mitra Unggul Pusaka) located in Pelalawan, Riau postponed to Re-Audit in year 2020. Status of RaCP and relevant issues are still in progress and waiting for RSPO feedback	Comply
Have there been any stakeholder (including NGO) consultation conducted?	No	N/A

3.3 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>There is only two smallholders: Penarikan KKPA and Gunung Sahilan KKPA that not been certified within three years. It is due to Segati Mill not yet certified and still on progress for Land Use Change.</p>	<p>Comply</p>
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3.4 Details of findings

The nonconformity is listed below. The summary report of the assessment by criteria is listed in Appendix A.

During the 4th Surveillance Assessment there were Six (6) Major; One (1) Minor nonconformity; One (1) Opportunity for improvement and One (1) Observation raised. The Ukui II 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 Major Nonconformity(ies) has been verified for it effectiveness and closed accordingly. The below is the summary of the non-conformity raised during this assessment.

Non-conformity			
NCR Ref #	1861406-201911-M1	Clause & Category (Major / Minor)	3.6.2 Critical (Major)
Date Issued	14 Dec 2019	Due Date	13 Mar 2020
Closed (Yes / No)	Yes	Date of nonconformity Closure	20 Feb 2020
Statement of Nonconformity:	Unit of Certification has establish the H&S Plan according to HIRAC 2019 including monitoring of H&S Plan, however there is no sufficient monitoring against effectiveness of the H&S plan to address health and safety risks.		
Requirement Reference:	3.6.2 (C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.		
Objective Evidence:	During field visit at - Loading Ramp station Ukui II POM, found that driver and FFB loader were not use appropriate PPE at workplace. While, the safety regulation at Ukui II POM, all workers shall be use appropriate PPE at Mill area. - Sterilizer operator Ukui-II POM not use appropriate PPE (safety shoes) at workplace. - Soga Estate and Sei Lala Estate found unsafe action that FFB loader seat at the top of truck cabin. - Ukui II POM, found that 4 fire hose at 5 Hydrant box are not properly function, while the checklist inspection stated that all Hydrant equipment were in good condition. - KUD Mekar Abadi, sighted 2 FFB loader not use PPE during work.		

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<p>Corrections:</p>	<ul style="list-style-type: none"> - PT IIS – Ukui II POM and Estate has taken action regarding the implementation of discipline to use the appropriate PPE provided by company according to risk analysis. Ukui II POM has issued the Memorandum No. 018/MI-PUD/MEMO/02/20 dated 18 February 2020 concerning the discipline of PPE usage. The Memorandum is apply for all workers including visitor in Palm oil Mill to use appropriate PPE according to the workplace area such as: safety helmet (all station), safety shoes (all station), masker (if necessary), other PPE as per risk analysis and company policy. Sanction will be given to workers and visitor who violate the this regulation including reprimand letter and blacklist to violater (driver and FFB transport from Plasma), reprimand letter to field foreman and workers both mill and estate. Memorandum has been disseminated to all employee/workers at Ukui II Palm Oil Mill, Soga and Sei Lala Estate and Plasma. Sample seen on socialization dated 18 February 2020 to FFB loader workers at Afdeling/Division I – IV Soga Estate. During interview with FFB loaders and driver from Soga Estate dan Sei Lala confirmed that they have understand regarding the obligation of PPE usage during working and visit to Ukui II POM; they also aware regarding the sanction given if they violate the regulation according the memorandum No. 018/MI-PUD/MEMO/02/20 dated 18 February 2020. - Management Plasma Ukui also has give the training and awareness to smallholder member of KUD Mekar Abadi and KUD Karya Tani on 30 December 2019. Training subject was related to Occupational Health and Safety including the awareness of PPE usage during working. Training record shon as per “Notulen Pelatihan Keselamatan dan Kesehatan Kerja dan Basic Safety (Penggunaan APD)”. Attendant list training and photo documentation were available. During interview with dirver and FFB loader workers at KUD Mekar Abadi and KUD Karya Tani confirmed that they have attend the training awareness of basic safety and understand regarding their obligation to obey the OHS rule and PPE usage. During field observation at KUD Mekar Abadi and KUD Karya Tani for FFB transportation activity shown that the driver and FFB loaders were using appropriate PPE (Saftey shoes, safety helmet and hand gloves). Mangement plasma Ukui also provide the new PPE for FFB loaders and dirver at KUD Mekar Abadi and KUD Karya Tani. As per “Berita Acara Penyerahan APD untuk Sopir dan Tukang Muat TBS Plasma” dated 30 December 2019. - Ukui II POM has repair and replacing the fire hose hydrant with the new one (4 fire hose) as per “Berita Acara Penggantian Selang Hydrant” dated 12 February 2020. The hydrant fire hose are found properly function and new condition, verification on hydrant box at loading ramp station, workshop station, sterilizer station and storage tank. Hydrant test also done and found in good condition and properly function with the sufficient high pressure.
<p>Root Cause Analysis:</p>	<ul style="list-style-type: none"> - Lack of Supervision function by Field Foreman/Field assistant including mill assistant to workers including FFB loaders at the workplace. - Lack of awareness and concern of workers including FFB loaders for health and safety at work because there are no sanctions given to violators of OHS norms in the field. - Lack of monitoring regarding the Hydrant installation including the equipment tools, the monitoring result made was not proper monitor by OHS expert due to mutation of OHS expert to another place.

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Corrective Actions:	<ul style="list-style-type: none"> - PT IIS – Ukui II POM and Estate has made the program to monitor the PPE usage by workers particularly for driver and FFB loaders. The monitoring was done daily by field supervision (foreman) as per “Daftar Pemeriksaan Alat Pelindung Diri (APD)”. Sample seen on monitoring checklist of PPE usage at Loading ramp station, sterilizer station, Engine room, FFB loader at Soga Estate and Sei Lala Estate Division I – IV period February 2020. - Plasma Ukui also has made the program to monitor the PPE usage by workers (driver and FFB loaders), daily monitoring was done as per “Checklist Monitoring Pemakaian APD” Tahun 2020. Sample seen for KUD Mekar Abadi and KUD Karya Tani, monitoring period January and February 2020. During field visit at KUD Mekar Abadi and KUD Karya Tani shown that all FFB loaders and driver were use appropriate PPE (safety shoes and safety helmet for driver and loader and handgloves only for FFB loaders). During interview with driver and FFB loaders at KUD Mekar Abadi and KUD Karya Tani confirmed that they have attend the training awareness of basic safety and understand regarding their obligation to obey the OHS rule and PPE usage.
Assessment Conclusion:	According to corrective action made and based on field verification during NCR Major visited on 20 February 2020, this NC is closed satisfactorily.

Non-conformity			
NCR Ref #	1861406-201911-M2	Clause & Category (Major / Minor)	5.3.2 Supply Chain Mill Requirements Module-D (Critical)
Date Issued	14 Dec 2019	Due Date	13 Mar 2020
Closed (Yes / No)	Yes	Date of nonconformity Closure	20 Feb 2020
Statement of Nonconformity:	Result of internal audit that conducted on 24 Oct 2019 is not effective to ensures implementation and maintaining the standard requirements within organisation.		
Requirement Reference:	5.3.2 Internal Audit (Supply Chain Mill Requirements, Module-D) The site shall have a written procedure to conduct annual internal audit to determine whether the organisation; <ul style="list-style-type: none"> • Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. • Effectively implements and maintains the standard requirements within its organisation. 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 organisation shall be able to maintain the internal audit records and reports.		
Objective Evidence:	1. PT. Inti Indosawit Subur - Ukui II POM has choose RSPO Supply Chain Module D - CPO Mills: Identity Preserved, however an internal audit that conducted on 24 Oct 2019 is not effective to ensuring implementation and maintaining the standard requirements within organisation, i.e.:		

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	<p>Clause 5.5 only stated about PK transport, whilst CPO transport activities was not included in the Internal Audit report.</p> <p>2. There was no evidence of management review in Ukui II POM that discussed result of internal audit and all actions taken to correct non-conformities as result of internal audit on 24 October 2019.</p>
<p>Corrections:</p>	<ul style="list-style-type: none"> - PT IIS – Ukui II POM has conduct re internal audit on 30 December 2019 against RSPO Supply Chain Module D - CPO Mills: Identity Preserved. Internal audit carried out by Syafrizal (Sustainability staff). Internal audit report can be demonstrated, during verification can be shown that clause 5.5 regarding outsource transporter has been assess/audit. Report of audit can be demonstrated during NCR verification and found to be sufficient. - PT IIS – Ukui II POM has conducted the management review on 6 January 2020 after internal audit done. Management review was attend by POM key personel including Mill manager, KTU, mill process assistant, clerk, weighing clerk and sustainability team. Management review input has follow the RSPO SCC standard including: <ul style="list-style-type: none"> ✓ Result of audit (internal and external) ✓ Customer feedback ✓ Process performance and evaluation ✓ Preventive and corrective action status ✓ Follow up action from previous management review ✓ Change that affect the system management ✓ Recommendation for improvement <p>Minutes of management review can be demonstrated and found to be sufficient.</p>
<p>Root Cause Analysis:</p>	<ul style="list-style-type: none"> - PT IIS UKui II POM deemed that transporter has comply to RSPO SCC and under the monitoring of company so that the internal audit has not include the transporter. - Minutes of management review were not present completely all the things discuss during management review, sustainability team Ukui II POM were not monitor the minutes of management review result.
<p>Corrective Actions:</p>	<ul style="list-style-type: none"> - Training on RSPO SCC standard and SOP Internal Audit AA-SOP-ES-6001-R5, Lampiran 1 has been done to key personel of Ukui II Palm Oil Mill including Mill manager, KTU, mill process assistant, production clerk and weighing clerk - Review the internal audit report by Sutainability team Jakarta to Ensure the sufficiency of iinternal audit process and result according to RSPO SCCS 2017. Internal audit report on 30 December 2019 against RSPO Supply Chain Module D - CPO Mills: Identity Preserved by Syafrizal (Sustainability staff) has been review by Welly Joel (Suatainability Jakarta). - Programmed the internal audit of RSPO SCCS at least twice a year by Internal Audit team. PT IIS - Ukui II POM has create the program of internal audit of integrated sustainability standard including RSPO SCCS at least twice a year (for

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	RSPO SCCS only). Internal audit program 2020 has been made and for RSPO SCCS internal audit will be planned to be conducted on March and November 2020.
Assessment Conclusion:	According to corrective action made and based on field verification during NCR Major visited on 19 February 2020, this NC is closed satisfactorily.

Non-conformity			
NCR Ref #	1861406-201911-M3	Clause & Category (Major / Minor)	5.6.1 Supply Chain Mill Requirements Module-D Major (Critical)
Date Issued	14 Dec 2019	Due Date	13 Mar 2020
Closed (Yes / No)	Yes	Date of nonconformity Closure	20 Feb 2020
Statement of Nonconformity:	There are discrepancy between Shipping Announcement of CSPO and CSPK in Palm Trace compare to CSPO and CSPK delivery according to monthly Book Keeping of Ukui II POM during period December 2018 to November 2019. It was indicated over sold volume of CSPO and CSPK.		
Requirement Reference:	5.6.1 Sales and Goods Out (Supply Chain Mill Requirements Module-D) The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form: The name and address of the buyer; <ul style="list-style-type: none"> • The name and address of the seller; • The loading or shipment / delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • Supply chain certificate number of the seller; • A unique identification number. • 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). • For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements / Announcements and Confirmations on the RSPO IT platform per shipment or group of shipments. 		
Objective Evidence:	<ol style="list-style-type: none"> 1. According to CSPO delivery based on monthly Book Keeping record of Ukui II POM, for period December 2018 to November 2019, CSPO delivery to PT SDS was 21,665.65 MT. Whilst according to RSPO PalmTrace Transaction, since December 2018 to November 2019, Shipping Announcement made for CSPO was 36,668.49 MT. There is discrepancy of CSPO sold volume in RSPO Palm Trace with amount 15,002.84 MT. 2. According to CSPK delivery based on monthly Book Keeping record of Ukui II POM, for period December 2018 to November 2019, CSPK delivery to 		

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	<p>Ukui I KCP was 16,061.38 MT. Whilst according to RSPO PalmTrace Transaction, since December 2018 to November 2019, Shipping Announcement made for CSPK was 18,193.77 MT. There is discrepancy of CSPK sold volume in RSPO Palm Trace with amount 2,132.39 MT.</p>																																																																								
<p>Corrections:</p>	<ul style="list-style-type: none"> - PT IIS Ukui II – POM has shown the correction on the book keeping record at Palm Oil Mill coordination with Marketing/Logistic team Head office to provide the information of palmtrace announcement. The book keeping record has included the information of RSPO palmtrace announcement for CSPO and CSPKO. The information is necessary to monitor the CSPO and CSPKO transaction on palmtrace to prevent the exceed volume transaction according to delivery of CSPO and CSPK. During verification audit, POM unit can be demonstrated that actually there is no discrepancy of CSPO and CSPK delivery and Palmtrace transaction (oversold). - According to Shipping/BL date confirmed that 36,668.49 MT of CSPO were shipping from 26/11/2018 – 30/10/2019 and DO from August 2018. While Palmtrace announcement was done by Marketing/Logistic team Head office 4 month later after shipping on December 2018. Since August 2018 until November 2019, CSPO delivery from Ukui II POM was 45,620.50 MT while the CSPO sold volume based on DO and Shipping confirmation during that period was 36,668.49 MT. <p>Below are the description of CSPO delivery and CSPO transaction on Palmtrace:</p> <table border="1" data-bbox="549 1115 1469 1861"> <thead> <tr> <th>Month</th> <th>RSPO CSPO Delivery</th> <th>RSPO Annopouncement (Palmtrace)</th> <th>Transaction date (Shipping/BL date)</th> </tr> </thead> <tbody> <tr><td>August 2018</td><td>5,586.60</td><td>-</td><td>-</td></tr> <tr><td>September 2018</td><td>6,050.39</td><td>-</td><td>-</td></tr> <tr><td>October 2018</td><td>5,492.89</td><td>-</td><td>-</td></tr> <tr><td>November 2018</td><td>6,824.97</td><td>-</td><td>2,039.95</td></tr> <tr><td>December 2018</td><td>444.20</td><td>6,439.95</td><td>4,400.00</td></tr> <tr><td>January 2019</td><td>-</td><td>4,079.95</td><td>9,265.67</td></tr> <tr><td>February 2019</td><td>3,226.83</td><td>8,485.67</td><td>3,299.95</td></tr> <tr><td>March 2019</td><td>2,985.84</td><td>-</td><td>-</td></tr> <tr><td>April 2019</td><td>-</td><td>4,138.41</td><td>5,188.41</td></tr> <tr><td>May 2019</td><td>3,425.12</td><td>2,549.88</td><td>2,999.88</td></tr> <tr><td>June 2019</td><td>3,323.30</td><td>3,000</td><td>1,500</td></tr> <tr><td>July 2019</td><td>597.05</td><td>-</td><td>1,000</td></tr> <tr><td>August 2019</td><td>-</td><td>1,000</td><td>374.97</td></tr> <tr><td>September 2019</td><td>367.32</td><td>1,374.88</td><td>3,499.91</td></tr> <tr><td>October 2019</td><td>5,659.44</td><td>5,599.75</td><td>3,099.75</td></tr> <tr><td>November 2019</td><td>1,636.55</td><td>-</td><td>-</td></tr> <tr><td>Total</td><td>45,620.50</td><td>36,668.49</td><td>36,668.49</td></tr> </tbody> </table> <p>So that according to the RSPO CSPO Delivery August 2018 to November 2019 compare to RSPO shipping announcement, the number of delivery CSPO is 45,620.50 MT while the Palmtrace announcement during that period was 36,668.49 MT, the rest of CSPK is becoming stock.</p>	Month	RSPO CSPO Delivery	RSPO Annopouncement (Palmtrace)	Transaction date (Shipping/BL date)	August 2018	5,586.60	-	-	September 2018	6,050.39	-	-	October 2018	5,492.89	-	-	November 2018	6,824.97	-	2,039.95	December 2018	444.20	6,439.95	4,400.00	January 2019	-	4,079.95	9,265.67	February 2019	3,226.83	8,485.67	3,299.95	March 2019	2,985.84	-	-	April 2019	-	4,138.41	5,188.41	May 2019	3,425.12	2,549.88	2,999.88	June 2019	3,323.30	3,000	1,500	July 2019	597.05	-	1,000	August 2019	-	1,000	374.97	September 2019	367.32	1,374.88	3,499.91	October 2019	5,659.44	5,599.75	3,099.75	November 2019	1,636.55	-	-	Total	45,620.50	36,668.49	36,668.49
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	<p>- According to Shipping/BL date confirmed that 18,193.77 MT of CSPK were shipping from 30/09/2018 – 31/10/2019 and DO from September 2018. While Palmtrace announcement was done by Marketing/Logistic team Head office 3 month later after shipping on December 2018. Since September 2018 until November 2019, CSPK delivery from Ukui II POM was 19,807.86 MT while the CSPK sold volume based on DO and Shipping confirmation during that period was 18,193.77 MT.</p> <p>Below are the description of CSPK delivery and CSPK transaction on Palmtrace:</p> <table border="1" data-bbox="549 651 1469 1556"> <thead> <tr> <th>Month</th> <th>RSPO CSPK Delivery</th> <th>RSPO Annopouncement (Palmtrace)</th> <th>Transaction date (Shipping/BL date)</th> </tr> </thead> <tbody> <tr><td>September 2018</td><td>294.73</td><td></td><td>308.14</td></tr> <tr><td>October 2018</td><td>1,814.00</td><td></td><td>1,698.11</td></tr> <tr><td>November 2018</td><td>1,637.75</td><td></td><td>1,729.09</td></tr> <tr><td>December 2018</td><td>1,357.93</td><td>3,544.79</td><td>1,357.26</td></tr> <tr><td>January 2019</td><td>1,435.77</td><td>1,357.26</td><td>1,411.20</td></tr> <tr><td>February 2019</td><td>1,207.97</td><td>1,411.20</td><td>1,130.34</td></tr> <tr><td>March 2019</td><td>1,459.10</td><td>1,320.89</td><td>-</td></tr> <tr><td>April 2019</td><td>1,312.88</td><td>-</td><td>2,636.52</td></tr> <tr><td>May 2019</td><td>948.79</td><td>-</td><td>996.45</td></tr> <tr><td>June 2019</td><td>1,106.79</td><td>2,636.52</td><td>1,105.24</td></tr> <tr><td>July 2019</td><td>1,534.66</td><td>-</td><td>1,495.92</td></tr> <tr><td>August 2019</td><td>1,547.84</td><td>-</td><td>1,572.34</td></tr> <tr><td>September 2019</td><td>1,083.77</td><td>2,601.16</td><td>1,000.25</td></tr> <tr><td>October 2019</td><td>1,822.92</td><td>-</td><td>1,752.91</td></tr> <tr><td>November 2019</td><td>1,242.96</td><td>5,321.95</td><td>-</td></tr> <tr><td>Total</td><td>19,807.88</td><td>18,193.77</td><td>18,193.77</td></tr> </tbody> </table> <p>So that according to the RSPO CSPK Delivery September 2018 to November 2019 compare to RSPO shipping announcement, the number of delivery CSPK is 19,807.88 MT while the Palmtrace announcement during that period was 18,193.77 MT, the rest of CSPK is becoming stock.</p>	Month	RSPO CSPK Delivery	RSPO Annopouncement (Palmtrace)	Transaction date (Shipping/BL date)	September 2018	294.73		308.14	October 2018	1,814.00		1,698.11	November 2018	1,637.75		1,729.09	December 2018	1,357.93	3,544.79	1,357.26	January 2019	1,435.77	1,357.26	1,411.20	February 2019	1,207.97	1,411.20	1,130.34	March 2019	1,459.10	1,320.89	-	April 2019	1,312.88	-	2,636.52	May 2019	948.79	-	996.45	June 2019	1,106.79	2,636.52	1,105.24	July 2019	1,534.66	-	1,495.92	August 2019	1,547.84	-	1,572.34	September 2019	1,083.77	2,601.16	1,000.25	October 2019	1,822.92	-	1,752.91	November 2019	1,242.96	5,321.95	-	Total	19,807.88	18,193.77	18,193.77
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September 2018	294.73		308.14																																																																		
October 2018	1,814.00		1,698.11																																																																		
November 2018	1,637.75		1,729.09																																																																		
December 2018	1,357.93	3,544.79	1,357.26																																																																		
January 2019	1,435.77	1,357.26	1,411.20																																																																		
February 2019	1,207.97	1,411.20	1,130.34																																																																		
March 2019	1,459.10	1,320.89	-																																																																		
April 2019	1,312.88	-	2,636.52																																																																		
May 2019	948.79	-	996.45																																																																		
June 2019	1,106.79	2,636.52	1,105.24																																																																		
July 2019	1,534.66	-	1,495.92																																																																		
August 2019	1,547.84	-	1,572.34																																																																		
September 2019	1,083.77	2,601.16	1,000.25																																																																		
October 2019	1,822.92	-	1,752.91																																																																		
November 2019	1,242.96	5,321.95	-																																																																		
Total	19,807.88	18,193.77	18,193.77																																																																		
<p>Root Cause Analysis:</p>	<ul style="list-style-type: none"> - Palmtrace announcement was done by Marketing/Logistic team Head office, whilst delivery and book keeping record was done by Ukui II POM; Lack of coordination between marketing team and POM unit so that there is a discrepancy of CSPO/CSPK delivery & announcement. - Lack of monitoring from sustainability team regarding Book Keeping and Palmtrace announcement/transaction. 																																																																				
<p>Corrective Actions:</p>	<ul style="list-style-type: none"> - Requests for CSPO announcements are made based on Ukui I POM delivery of CSPO/CSPK, to ensure that the actual CSPO sent actually comes from Ukui I POM, the information of which will be conveyed by the sustainability officer to 																																																																				

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	<p>the logistics party as the basis for the announcement (Maximum 3 months). Sustainability team Jakarta has brief the information to Marketing/Logistic team Head office and Ukui II POM through Sustainability Ukui Group.</p> <ul style="list-style-type: none"> - Add Announcement Column and Transaction Date Column (to ensure the volume checked by the auditor will be the same, based on the download period on palmtrace) and Refresh Socialization related to mass balance format with additional announcement columns specifically for RSPO SCCS. Book keeping record at Ukui II POM has been change as per document record keeping period January – December 2019. Record keeping has include the information of CPO/PK production certified and non certified, delivery CPO/PK certified and non certified, first stock and final stock CPO & PK certified and non certified, CPO/PK sold as certified and non certified, CSPO/CSPK Palmtrace announcement and date of transaction. During audit verification, record keeping period January – December 2018 and 2019 can be demonstrated and found completed and balance between production, delivery, sales and stock. - Sustainability team Jakarta and Ukui Group has monitor each month the record keeping. Latest monitoring conducted on January 2020. According to latest monitoring, there is no discrepancy of CPO/PK delivery and sales.
<p>Assessment Conclusion:</p>	<p>According to corrective action made and based on field verification during NCR Major visited on 20 February 2020, this NC is closed satisfactorily.</p>

Non-conformity			
<p>NCR Ref #</p>	<p>1861406-201911-M4</p>	<p>Clause & Category (Major / Minor)</p>	<p>4.1.1 Critical (Major)</p>
<p>Date Issued</p>	<p>14 Dec 2019</p>	<p>Due Date</p>	<p>13 Mar 2020</p>
<p>Closed (Yes / No)</p>	<p>Yes</p>	<p>Date of nonconformity Closure</p>	<p>20 Feb 2020</p>
<p>Statement of Nonconformity:</p>	<p>Unit of Certification cannot demonstrated policy of human right that include prohibiting retaliation against Human Rights Defenders (HRD), prohibitions of intimidation and harassment by the unit of certification and contracted services.</p>		
<p>Requirement Reference:</p>	<p>4.1.1 (C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, supply chain and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p>		
<p>Objective Evidence:</p>	<p>PT. Inti Indosawit Subur already has a Policy to respect human rights as outlined in the Corporate Policy issued by the Managing Director of Asian Agri on 1 December 2014, especially at Point 13. However, the policy does not mentioned about prohibiting retaliation against Human Rights Defenders (HRD), prohibits intimidation and harassment by the unit of certification and contracted services.</p>		
<p>Corrections:</p>	<ul style="list-style-type: none"> - PT IIS Ukui I POM has made coordination with Jakarta Regional Office (JRO) to follow up an update corporate policy. PT Inti Indosawit Subur under Asian Agri Group has issued the corporate policy under “Kebijakan Perusahaan” 		

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	<p>updated on 31 December 2019 signed by Managing Director. In particular of human right policy, company has issued "Human Rights Policy" dated 1 December 2019 and signed by Managing Director. Asian Agri respect and support the Universal Declaration of Human Rights (UDHR) as well as the international labour organization declaration on fundamental principles and rights at work. Asian Agri have pledged itself to achieve the promotion of universal respect for and observance of human rights and fundamental freedoms. The document is based on the United Nations (UN) Guiding principles on Business and Human Rights framework to guide the development and implementation of Human rights. Human right policy cover 6 aspect of workplace right and community right including grievance of whistle blowing.</p> <p>Details on requirements to protect the rights of Human Right Defenders, including complainants, whistleblowers and community spokespersons, are set out in "Memorandum No: 005/GM-KUK/MEMO/02/20 dated 10 February 2020 "Kebijakan Melarang Adanya Tindakan Balas Dendam, Intimidasi, dan Pelecehan untuk Pelapor/Pembela Hak Asasi Manusia (Human Right Defender).</p> <p>To protect the complainants, whistleblowers and community spokespersons company also has a procedure of "Penyampaian dan Penyelesaian keluhan karyawan" SOP No: AA-HR-308.5-R1 dated 5 December 2019.</p> <ul style="list-style-type: none"> - Company policy has disseminated to all staff and employee. Sample seen: socialization on 10 February 2020 to all staff PT Inti Indosawit Subur (Ukui I & Ukui II POM and supply bases); Socialization on 14 February 2020 to employee Afd III; Socialization on 13 February 2020 to employee Afd. I. Company also provide the policy in the banner which installed in the strategic place (in front of estate/division office and main road). During interview with workers at Ukui II POM, Soga and Sei Lala Estate and smallholder confirmed that they have understand on the company policy regarding Human Right Defenders, including complainants, whistleblowers and community spokespersons.
<p>Root Cause Analysis:</p>	<p>Human right policy was not updated and adjust to new RSPO standard, the new policy has not been approved by top management.</p>
<p>Corrective Actions:</p>	<p>Kept the updated company policy and filed in soft and hard copies and disseminated to all employees. Updating the company pollicy according to current RSPO standard and relevant regulation and disseminated to all employees if there is an updated and changing of policy.</p> <p>PT IIS – Ukui II POM has kept the current corporate policy "Kebijakan Perusahaan" "Kebijakan Perusahaan" updated on 31 December 2019 signed by Managing Director. In particular of human right policy, company has issued "Human Rights Policy" dated 1 December 2019 and signed by Managing Director. Details on requirements to protect the rights of Human Right Defenders, including complainants, whistleblowers and community spokespersons, are set out in "Memorandum No: 005/GM-KUK/MEMO/02/20 dated 10 February 2020 "Kebijakan Melarang Adanya Tindakan Balas Dendam, Intimidasi, dan Pelecehan untuk Pelapor/Pembela Hak Asasi Manusia (Human Right Defender).</p>

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	To protect the complainants, whistleblowers and community spokespersons company also has a procedure of "Penyampaian dan Penyelesaian keluhan karyawan" SOP No: AA-HR-308.5-R1 dated 5 December 2019.
Assessment Conclusion:	According to corrective action made and based on field verification during NCR Major visited on 20 February 2020, this NC is closed satisfactorily.

Non-conformity			
NCR Ref #	1861406-201911-M5	Clause & Category (Major / Minor)	4.2.1 Critical (Major)
Date Issued	14 Dec 2019	Due Date	13 Mar 2020
Closed (Yes / No)	Yes	Date of nonconformity Closure	20 Feb 2020
Statement of Nonconformity:	Resolve disputes system which developed by unit of certification is not follows the RSPO policy on respect for Human Right Defender (HRD).		
Requirement Reference:	4.2.1 (C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.		
Objective Evidence:	<ul style="list-style-type: none"> - Company Policy related to respect for Human Right Defender (HRD) without risk of reprisal or intimidation is not approved. - "SOP Penanganan Keluhan Masyarakat" No: AA-GL-510.1-R0, dated 1 January 2013 was not refer to policy on respect for HRD. 		
Corrections:	<p>PT IIS – Ukui Group has updated the procedure of grievances and complaint handling as per "SOP Penyampaian dan Penyelesaian keluhan karyawan" SOP No: AA-HR-308.5-R1 dated 5 December 2019. This procedure is to handling the internal grievances and complaint handling from employee. This procedure has include the mechanism of protection to Human Right Defenders, including complainants, whistleblowers and spokespersons.</p> <p>In particular of human right policy, company has issued "Human Rights Policy" dated 1 December 2019 and signed by Managing Director. Details on requirements to protect the rights of Human Right Defenders, including complainants, whistleblowers and community spokespersons, are set out in "Memorandum No: 005/GM-KUK/MEMO/02/20 dated 10 February 2020 "Kebijakan Melarang Adanya Tindakan Balas Dendam, Intimidasi, dan Pelecehan untuk Pelapor/Pembela Hak Asasi Manusia (Human Right Defender).</p> <p>The eksternal grievances and complaint handling was stipulated as per "Mekanisme Keluhan" which provided in the Website of Asian Agri and can be accessed by all stakeholder of Asian Agri at https://www.asianagri.com/id/panel-keberlanjutan/keluhan-pengaduan .</p> <p>Asian Agri stakeholders include but are not limited to the Government, farmers, suppliers, vendors, academics, NGOs, media, etc., provided different complaint channels to report their complaints / findings. Reporters can submit complaints and information related to business violations, corruption, harassment, criminal acts, the environment, and others. All reports are confidential and if deemed appropriate, updates will be publicly available</p>		

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	<p>according to Grievance Mechanism:</p> <p style="text-align: center;">Main Steps of AA Grievance Procedure</p> <p>The Grievance Raiser may nominate a third party to act on their behalf.</p>
<p>Root Cause Analysis:</p>	<p>The updated SOP for handling public complaints containing Human Rights Defenders (HRD) is still in the process of revision and Approved by management.</p>
<p>Corrective Actions:</p>	<p>Updated complaints handling SOPs are stored and filed in soft and hard copies and disseminated to employees.</p> <p>Dissemination of procedure and policy has been conducted on 10 – 15 February 2020. Evidence of socialization can be demonstrated during audit verification such as: attendant list, photo documentation. Company also provide the policy in the banner which installed in the strategic place (in front of estate/division office and main road). During interview with workers at Soga and Sei Lala Estate and smallholder confirmed that they have understand on the company policy regarding Human Right Defenders, including complainants, whistleblowers and community spokespersons.</p>
<p>Assessment Conclusion:</p>	<p>According to corrective action made and based on field verification during NCR Major visited on 20 February 2020, this NC is closed satisfactorily.</p>

Non-conformity			
NCR Ref #	1861406-201911-M6	Clause & Category (Major / Minor)	6.7.3 Critical (Major)
Date Issued	14 Dec 2019	Due Date	13 Mar 2020
Closed (Yes / No)	Yes	Date of nonconformity Closure	20 Feb 2020
Statement of Nonconformity:	Workers not use appropriate PPE at workplace.		
Requirement Reference:	6.7.3 (C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are		

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	available, so that workers can change out of PPE, wash and put on their personal clothing.
Objective Evidence:	<p>During field visit at</p> <ul style="list-style-type: none"> - Loading Ramp station Ukui II POM, found that driver and FFB loader were not use appropriate PPE at workplace. While, the safety regulation at Ukui II POM, all workers shall be use appropriate PPE at Mill area. - Sterilizer operator Ukui-II POM not use appropriate PPE (safety shoes) at workplace. - KUD Mekar Abadi, sighted 2 FFB loader not use PPE during work.
Corrections:	<ul style="list-style-type: none"> - PT IIS – Ukui II POM and Estate has taken action regarding the implementation of discipline to use the appropriate PPE provided by company according to risk analysis. <p>Ukui II POM has issued the Memorandum No. 018/MI-PUD/MEMO/02/20 dated 18 February 2020 concerning the discipline of PPE usage. The Memorandum is apply for all workers including visitor in Palm oil Mill to use appropriate PPE according to the workplace area such as: safety helmet (all station), safety shoes (all station), masker (if necessary), other PPE as per risk analysis and company policy. Sanction will be given to workers and visitor who violate the this regulation including reprimand letter and blacklist to violater (driver and FFB transport from Plasma), reprimand letter to field foreman and workers both mill and estate.</p> <p>Memorandum has been disseminated to all employee/workers at Ukui II Palm Oil Mill, Soga and Sei Lala Estate and Plasma. Sample seen on socialization dated 18 February 2020 to FFB loader workers at Afdeling/Division I – IV Soga Estate. During interview with FFB loaders and driver from Soga Estate dan Sei Lala confirmed that they have understand regarding the obligation of PPE usage during working and visit to Ukui II POM; they also aware regarding the sanction given if they violate the regulation according the memorandum No. 018/MI-PUD/MEMO/02/20 dated 18 February 2020.</p> - Management Plasma Ukui also has give the training and awareness to smallholder member of KUD Mekar Abadi and KUD Karya Tani on 30 December 2019. Training subject was related to Occupational Health and Safety including the awareness of PPE usage during working. Training record shon as per "Notulen Pelatihan Keselamatan dan Kesehatan Kerja dan Basic Safety (Penggunaan APD)". Attendant list training and photo documentation were available. During interview with dirver and FFB loader workers at KUD Mekar Abadi and KUD Karya Tani confirmed that they have attend the training awareness of basic safety and understand regarding their obligation to obey the OHS rule and PPE usage. During field observation at KUD Mekar Abadi and KUD Karya Tani for FFB transportation activity shown that the driver and FFB loaders were using appropriate PPE (Saftey shoes, safety helmet and hand gloves). Mangement plasma Ukui also provide the new PPE for FFB loaders and dirver at KUD Mekar Abadi and KUD Karya Tani. As per "Berita Acara Penyerahan APD untuk Sopir dan Tukang Muat TBS Plasma" dated 30 December 2019.
Root Cause Analysis:	<ul style="list-style-type: none"> - Lack of Supervision function by Field Foreman/Field assistant including mill assistant to workers including FFB loaders at the workplace.\

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	<ul style="list-style-type: none"> - Lack of awareness and concern of workers including FFB loaders for health and safety at work because there are no sanctions given to violators of OHS norms in the field.
Corrective Actions:	<ul style="list-style-type: none"> - PT IIS – Ukui II POM and Estate has made the program to monitor the PPE usage by workers particularly for driver and FFB loaders. The monitoring was done daily by field supervision (foreman) as per “Daftar Pemeriksaan Alat Pelindung Diri (APD)”. Sample seen on monitoring checklist of PPE usage at Loading ramp station, sterilizer station, Engine room, FFB loader at Soga Estate and Sei Lala Estate Division I – IV period February 2020. - Plasma Ukui also has made the program to monitor the PPE usage by workers (driver and FFB loaders), dailuy monitoring was done as per “Checklist Monitoring Pemakaian APD” Tahun 2020. Sample seen for KUD Mekar Abadi and KUD Karya Tani, monitoring period January and February 2020. During field visit at KUD Mekar Abadi and KUD Karya Tani shown that all FFB loaders and dirver were use appropriate PPE (safety shoes and safety helmet for driver and loader and handgloves only for FFB loaders). During interview with driver and FFB loaders at KUD Mekar Abadi and KUD Karya Tani confirmed that they have attend the training awareness of basic safety and understand regarding their obligation to obey the OHS rule and PPE usage.
Assessment Conclusion:	According to corrective action made and based on field verification during NCR Major visited on 20 February 2020, this NC is closed satisfactorily.

Non-conformity			
NCR Ref #	1861406-201911-N1	Clause & Category (Major / Minor)	6.2.7 Minor
Date Issued	14 Dec 2019	Due Date	Next Surveillance
Closed (Yes / No)	Yes	Date of nonconformity Closure	Next Surveillance
Statement of Nonconformity:	Unit of certification employed harvester as core work with non-permanent and full-time employment.		
Requirement Reference:	6.2.7 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:	<p>Based on list of employee’s data at Sei Lala Estate period November 2019, there is total 95 temporary workers (harvester and FFB loader) as core work performed. Whereby, promotion program for temporary/casual workers cannot demonstrate by unit of certification.</p> <p>Based on interview with harvesting supervisor in Block D90a, Afdeling 4 (Soga Estate) it was informed that 2 temporary harvester and 7 temporary harvester in Block D91d, Afdeling 4 (Sei Lala Estate) are still employed by the unit of certification. However, promotion program for temporary/casual workers cannot demonstrate by unit of certification.</p>		

Corrections:	Create a promotion program for harvest employees and cargo workers in 2020 - 2035
Root Cause Analysis:	The mechanism of promotion of harvest employees and loaders has not yet been finalized
Corrective Actions:	Ensuring that all core workers related to palm oil plantation are permanent workers. Monitoring the casual workers each month by KTU to ensure that they don't performed the core work and ensure that casual workers work more than 3 month are promote to be permanent workers according to labor regulation.
Assessment Conclusion:	This NC still OPEN and will be verified during the next surveillance.

Opportunity for Improvements	
OFI #	Description
OFI 1	1861406-201911-I1 Indicator 7.12.7 Considering re-delineated measurement of HCV area along the riparian at replanting area, to prevent double counting in planted area.

Positive Findings	
PF #	Description
PF 1	

3.4.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	1722078-201812-M1	Clause & Category (Major / Minor)	4.7.2 MAJOR
Closed (Yes / No)	Yes	Date of nonconformity Closure	13 February 2019
Statement of Nonconformity:	Risk analysis for Ukui II POM, Soga Estate and Scheme Smallholder was not consistent with procedure for risk assessment.		
Requirement Reference:	4.7.2 A documented risk assessment shall be available and its implementation shall be recorded.		
Objective Evidence:	Consequence value 15 determined for one fatality; value 7 determined for serious injury causing permanent disability, value 3 determined for injury requires medical treatment; value 1 determined for injury requires first aid. Location: Loading ramp; Activity: Returning rejected FFB; Identified risk: Injury and head wound; Consequence value: 15 – not consistent; affecting the determination of alternative risk control.		

	<p>Location: Sterilizer; Activity: FFB processing; Identified risk: Injury and head wound; consequence value: 15 – not consistent; affecting the determination of alternative risk control.</p> <p>Location: Threshing station; Activity: Operating distributing conveyor and replacing conveyor; Identified risk: Fatality; consequence value: 7 – not consistent; affecting the determination of alternative risk control.</p> <p>Location: Loading hopper; Activity: Cleaning scrap metal; Identified risk: Injury; consequence value: 15 – not consistent; affecting the determination of alternative risk control.</p> <p>Location: BST; Activity: Cleaning dispatch floor; Identified risk: cough and respiratory infection; consequence value: 15 – not consistent; affecting the determination of alternative risk control.</p> <p>In Ukui II POM laboratory, there is a use of hexane as reagent (carcinogenic) however, these risk have not been taken into HIRADC consideration. Furthermore, during visit to laboratory, there was no PPE as per mandated from MSDS available.</p> <p>Similar error was found in HIRADC for smallholder:</p> <p>Location: Smallholder plantation; Activity: FFB cutting; Identified risk: fatality; Consequence value: 3 – not consistent; affecting the determination of alternative risk control.</p> <p>Location: Smallholder plantation; Activity: Fertilizer application; Identified risk: intoxication; consequence value: 4 (no such value) – not consistent; affecting the determination of alternative risk control.</p> <p>Soga Estate prepared HIRADC 2018. The risk analysis matrix was found not consistent with the current methodology. The risk analysis only taking into consideration frequency x consequences. In addition, the risk evaluation was not consistent.</p> <p>Location: Plantation; Activity: FFB and loose fruit loading; Identified risk: Injury and permanent disability; Consequence value: 5 (for fatality) – not consistent; affecting the determination of alternative risk control.</p>
<p>Corrective Actions:</p>	<p>Evaluate and update on risk analysis document once a year properly, if work related injuries is occurs. For risk level assessment will refer to score as describe in risk assessment procedure.</p>
<p>Assessment Conclusion:</p>	<p>Major NCR Close Out Visit Date: 13 February 2019 Evidence seen: Matrix of Consequences Value Catastrophe: death/fatality, big loss/totally process stop. Value: 100. Disaster: several death, big loss, partial process stop. Value: 40. Very serious: causing death, big loss. Value: 15. Serious: causing serious injury like permanent disability or lost part of the body. Value: 7. Casualty treatment: causing injuries and need medical treatment or absence to work. Value: 3. First aid treatment: near miss injuries. Value: 1.</p>

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	<p>Hazard Identification & Risk Assessment and Control (HIRAC) Ukui-2 POM Year 2019. Revising and updated on 7 January 2019. Documented record sample to be verified: Location: Loading ramp; Activity: Returning rejected FFB; Identified risk: Injury and head wound; Consequence value: 3. Location: Sterilizer; Activity: FFB processing; Identified risk: Injury and head wound; consequence value: 3. Location: Threshing station; Activity: Operating distributing conveyor and replacing conveyor; Identified risk: Fatality; consequence value: 15. Location: Loading hopper; Activity: Cleaning scrap metal; Identified risk: Injury; consequence value: 3. Location: BST; Activity: Cleaning dispatch floor; Identified risk: cough and respiratory infection; consequence value: 3. Location: Laboratory; Activity: Oil analysis; Material Used: Chemical, Hexane; Identified risk: inhaled and exposed of Hexane; consequence value: 3. During field visit to Laboratory, PPE provided are gloves and masks. This PPE has been refer to MSDS and HIRAC for Mill.</p> <p>HIRAC for Soga Estate: Risk Analysis Program Soga Estate 2019, update on January 2019. The risk analysis matrix on current HIRAC is already considering completed methodology: Exposure x Frequencies x Consequences. Location: Plantation; Activity: FFB and loose fruit loading; Identified risk: Injury and permanent disability; Consequence value: 15.</p> <p>HIRAC for Smallholder: "Rencana Kesehatan dan Keselamatan Kerja 2019". Update 3 January 2019. Location: Smallholder plantation; Activity: FFB cutting; Identified risk: fatality; Consequence value: 15. Location: Smallholder plantation; Activity: Fertilizer applicaton; Identified risk: intoxication; consequence value: 3.</p> <p>According to the evidence provided and verification by direct interview, corrective action made is effectively implemented. Therefore, auditor concludes this Non-Conformity is Closed.</p>
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Non-conformity			
NCR Ref #	1722078-201812-M2	Clause & Category (Major / Minor)	3.2.ii) General CoC requirements for the supply chain. MAJOR
Closed (Yes / No)	Yes	Date of nonconformity Closure	13 February 2019
Statement of Nonconformity:	Result of internal audit that conducted on 26 September 2018 is not effective to ensuring implementation and maintaining the standard requirements within organisation.		
Requirement Reference:	RSPO SCC General Chain of Custody requirements for the supply chain.		

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	<p>3.2.ii) The site shall have a written procedure to conduct annual internal audit to determine whether the organization; ii) Effectively implements and maintains the standard requirements within its organization.</p> <p>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 nonconformities shall be subject to management review at least annually. The organization must be able to maintain the internal audit records and reports.</p>
Objective Evidence:	<p>PT Inti Indosawit Subur - Ukui 2 POM has choosing RSPO Supply Chain Module D - CPO Mills: Identity Preserved, however an internal audit that conducted on 26 September 2018 is not effective to ensuring implementation and maintaining the standard requirements within organisation, i.e:</p> <ul style="list-style-type: none"> - Requirement of general chain of custody requirements for the supply chain clauses: 5.4. Purchasing and goods in (reported not applicable) - Evidences recorded is PMKS Peranab for clauses 5.1.1, 5.1.2, 5.1.3
Corrective Actions:	<p>Ensuring Internal Audit procedures and Appendix 2 regarding the RSPO SCCS 2017 has been understood and well implemented by the designated PIC.</p>
Assessment Conclusion:	<p>Major NCR Close Out Visit Date: 13 February 2019 RSPO SCCS Refresh training carried out on 14 January 2019, by Welly Joel Chandra upon 10 participants: Boyke R.P. Silitonga, Rentor P. Simanjuntak (Manager Ukui 2 POM), Syafrizal, Irwan Indra S (Sustainability Officer), Pirma Hutagaol (Manager Ukui I POM), Nila Sari, Herta Murniati (Weighbridge Operator Ukui I POM), Edy Syah (Production Bookkeeper Ukui I POM), Paul Sinaga (KTU Ukui I POM), Nurani Tambunan (Weighbridge operator Ukui 2 POM).</p> <p>Internal audit carried out by Syafrizal for Ukui 2 POM dated 8 January 2019. The information sampled for internal audit report have reflected the updated information from Ukui 2 POM. Sampled information: PalmTrace Ukui 2 POM is RSPO_PO1000002491; CSPO transaction TR-bc2934f5-4193 for 2,499.88 MT CSPO to buyer PT. Sari Dumai Sejati dated 13 November 2018; Document B/L No.NOR-1805-NOV-701-705.</p> <p>According to the evidence provided and verification by direct interview, corrective action made is effectively implemented. Therefore, auditor concludes this Non-Conformity is Closed.</p>

Non-conformity			
NCR Ref #	1722078-201812-M3	Clause & Category (Major / Minor)	5.8.2 General CoC requirements for the supply chain. MAJOR
Closed (Yes / No)	Closed	Date of nonconformity Closure	13 February 2019

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Statement of Nonconformity:	Personnel trained who assigned implementation of the supply chain are not well demonstrate during this surveillance assessment.
Requirement Reference:	RSPO SCC General Chain of Custody requirements for the supply chain. 5.8.2 Appropriate training shall be provided by the organization for personnel carrying out the tasks critical to the effective implementation of the supply chain certification standard requirements. Training shall be specific and relevant to the task(s) performed.
Objective Evidence:	Training for personnel who apply supply chain standard has been conducted on 22 September 2018 in Training Centre Asian Agri. However, effectiveness of training result are not well demonstrate during this assessment. In example: ineffectiveness of carrying out an internal audit; ineffective of input and output of management review.
Corrective Actions:	Conduct training on a regular basis (annually).
Assessment Conclusion:	Major NCR Close Out Visit Date: 13 February 2019 Audit team sighted records: Pre-test prior to RSPO SCCS Refresh training carried out on 14 January 2019, by Welly Joel Chandra; Post-test after RSPO SCCS Refresh training carried out on 14 January 2019, by Welly Joel Chandra; The pre-test and post-test questionnaire including understanding on RSPO Supply Chain Certification Standard, revised June 2017 – clause 5.3 Internal audit and 5.13 Management Review. Training evaluation form upon RSPO SCCS Refresh training carried out on 14 January 2019, by Welly Joel Chandra – result sufficient. PT. Inti Indosawit Subur – Ukui 2 POM have prepared a training program to staff, who is involved in RSPO Supply Chain Certification Standard implementation. As per training program, "Program Pelatihan Environmental & Sustainability Tahun 2019 PT. Inti Indosawit Subur Ukui Dua". Refresh training and traceability programmed for October 2019; Refresh Training RSPO SCCS planned for September 2019. According to the evidence provided and verification by direct interview, corrective action made is effectively implemented. Therefore, auditor concludes this Non-Conformity is Closed.

Non-conformity			
NCR Ref #	1722078-201812-M4	Clause & Category (Major / Minor)	5.13.2 General CoC requirements for the supply chain. MAJOR
Closed (Yes / No)	Yes	Date of nonconformity Closure	13 February 2019
Statement of Nonconformity:	Input to management review was inadequate.		
Requirement Reference:	RSPO SCC General Chain of Custody requirements for the supply chain. 5.13.2		

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	<p>The input to management review shall include information on:</p> <ul style="list-style-type: none"> • Results of internal audits covering RSPO Supply Chain Certification Standard. • Customer feedback. • Status of preventive and corrective actions. • Follow-up actions from management reviews. • Changes that could affect the management system. • Recommendations for improvement.
Objective Evidence:	<p>Management review was conducted on 22th November 2018, however the input to management review was inadequate, e.g:</p> <ul style="list-style-type: none"> • Internal audit result that not effective • There was not covered related to changes that could affect the management system
Corrective Actions:	<p>Conduct periodic management reviews (annually)</p>
Assessment Conclusion:	<p>Major NCR Close Out Visit Date: 13 February 2019 Audit team sighted records: Pre-test prior to RSPO SCCS Refresh training carried out on 14 January 2019, by Welly Joel Chandra; Post-test after RSPO SCCS Refresh training carried out on 14 January 2019, by Welly Joel Chandra; The pre-test and post-test questionnaire including understanding on RSPO Supply Chain Certification Standard, revised June 2017 – clause 5.3 Internal audit and 5.13 Management Review. Training evaluation form upon RSPO SCCS Refresh training carried out on 14 January 2019, by Welly Joel Chandra – result sufficient. Management review upon 2018 performance, carried out on 14 January 2019. The agenda: - The result of audits: based on result from internal audit on 8 January 2019 – no NC issued; finding from external assessment related to internal audit process have been rectified; - Customer feedback – no customer complaint; improved knowledge from Ukui 2 POM on how to communicates with Marketing Department – in the case of any complaint; - Process performance and product conformity – no issue from VE visit and sample analysis result from buyer; - Status of corrective and preventive action – followed up through consistent management review; - Follow up from previous management review – add monitoring sheet for training and management review, to be carried out as planned; - Changes that could affect the management system – no changes; - and Recommendation for improvement – no changes. Management review meeting Ukui 2 POM attended by Syafrizal (Sustainability Officer), Rentor Simanjuntak (Manager Ukui 2 POM), Nuraini Tambunan (Weighbridge Operator).</p> <p>According to the evidence provided and verification by direct interview, corrective action made is effectively implemented. Therefore, auditor concludes this Non-Conformity is Closed.</p>

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Non-conformity			
NCR Ref #	1722078-201812-M5	Clause & Category (Major / Minor)	5.13.3 General CoC requirements for the supply chain. MAJOR
Closed (Yes / No)	Yes	Date of nonconformity Closure	13 February 2019
Statement of Nonconformity:	Output from management review was inadequate due to input agenda.		
Requirement Reference:	RSPO SCC General Chain of Custody requirements for the supply chain. 5.13.3 The output from the management review shall include any decisions and actions related to: <ul style="list-style-type: none"> • Improvement of the effectiveness of the management system and its processes. • Resource needs. 		
Objective Evidence:	Management review as conducted on 22th November 2018, however the output include any decisions and actions related to improvement of the effectiveness of the management system and its processes was inadequate due to input agenda.		
Corrective Actions:	Conduct periodic management reviews (annually)		
Assessment Conclusion:	Major NCR Close Out Visit Date: 13 February 2019 Audit team sighted records: Pre-test prior to RSPO SCCS Refresh training carried out on 14 January 2019, by Welly Joel Chandra; Post-test after RSPO SCCS Refresh training carried out on 14 January 2019, by Welly Joel Chandra; The pre-test and post-test questionnaire including understanding on RSPO Supply Chain Certification Standard, revised June 2017 – clause 5.3 Internal audit and 5.13 Management Review. Training evaluation form upon RSPO SCCS Refresh training carried out on 14 January 2019, by Welly Joel Chandra – result sufficient. Management review upon 2018 performance, carried out on 14 January 2019. The agenda: - Improvement of the effectiveness of the management system and its processes: progress training and understanding, improved internal audit result, to follow up VE visit; - Resource needs: personnel understanding is adequate. Management review meeting Ukui 2 POM attended by Syafrizal (Sustainability Officer), Rentor Simanjuntak (Manager Ukui 2 POM), Nuraini Tambunan (Weighbridge Operator). According to the evidence provided and verification by direct interview, corrective action made is effectively implemented. Therefore, auditor concludes this Non-Conformity is Closed.		

Non-conformity			
NCR Ref #	1722078-201812-N1	Clause & Category	4.7.5 Minor

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		(Major / Minor)	
Closed (Yes / No)	Yes	Date of nonconformity Closure	14 Dec 2019
Statement of Nonconformity:	Emergency equipment are not well maintain and ready to use.		
Requirement Reference:	4.7.5 Minor A procedure for emergency and work accident shall be available in Indonesian Language; and the workers, who have attended First Aids training, are available in the working areas.		
Objective Evidence:	During field visit in Harvesting activity Block C98h Afdeling 3 Soga Estate in 18 December 2018, found: - Leakage condition of Povidone Iodine bottle. - First Aid equipment (Alcohol) was expired since March 2016.		
Corrective Actions:	1. Monitoring on First Aid Box shall be comprehensive, includes expiry date and following available checklist. 2. Expired drugs taken out from First Aid Box, deliver to Hazardous Waste storage and write the report refer to applicable form.		
Assessment Conclusion:	Verification of corrective action during 4 th Surveillance has concludes this minor NC are closed satisfactorily.		

Non-conformity			
NCR Ref #	1722078-201812-N2	Clause & Category (Major / Minor)	4.7.7 Minor
Closed (Yes / No)	Yes	Date of nonconformity Closure	14 Dec 2019
Statement of Nonconformity:	Calculation for lost time from accident record was found to be inaccurate.		
Requirement Reference:	4.7.7 Minor Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics.		
Objective Evidence:	A discrepancy noted between accident records in Soga Estate: Record "Notulen Rapat P2K3 Kebun Soga" period January – March 2018, April – June 2018, July – September 2018 stated no case with lost time incident. However, comparing to data for referral onto hospital, a total of 305 lost working days recorded.		
Corrective Actions:	During safety meeting, work injuries should be refer to work injuries data record. Minutes on safety meeting shall be made for work injuries criteria (FA, MA, LT) and refer to available injuries records.		
Assessment Conclusion:	Verification of corrective action during 4 th Surveillance has concludes this minor NC are closed satisfactorily.		

Non-conformity

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NCR Ref #	1722078-201812-N3	Clause & Category (Major / Minor)	5.3.3 Minor
Closed (Yes / No)	Yes	Date of nonconformity Closure	14 Dec 2019
Statement of Nonconformity:	Waste Management Plan implementation was not controlled.		
Requirement Reference:	5.3.3 Minor A documented waste management plan to avoid or reduce pollution and its implementation shall be available.		
Objective Evidence:	<p>Inappropriate waste disposal found during site visits:</p> <p>Found disposal of empty motorcycle lubricant container, empty paint can, empty grease pile, empty hydraulic oil drums in scrap yard Ukui II POM. Based on waste management plan, all hazardous waste should be disposed off into permitted hazardous waste storage.</p> <p>Found disposal of empty motorcycle lubricant and filter mesh in housing complex Soga Estate, Afdeling IV. Based on waste management plan, all hazardous waste should be disposed off into permitted hazardous waste storage.</p>		
Corrective Actions:	Maintaining on oil trap in generator/power house once a week.		
Assessment Conclusion:	Verification of corrective action during 4 th Surveillance has concludes this minor NC are closed satisfactorily.		

Opportunity for Improvement	
OFI#	Description
OFI 1	1722079-201812-I1 Process on renewal of Land Use Title (HGU) certificate No. 01 Year 1989, expired on 31 st December 2019 shall be monitored.

3.4.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Major / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1412038M1	MAJOR	4.6.5	1-11-2016	Closed. 31-01-2017
1412038M2	MAJOR	4.7.2	1-11-2016	Closed. 31-01-2017
1412038M3	MAJOR	4.4.2	1-11-2016	Closed. 31-01-2017
1412038N1	minor	4.7.6	1-11-2016	Closed. 21-12-2017
1569381-201712-M1	MAJOR	4.7.1	21-12-2017	Closed. 13-02-2018
1569381-201712-M2	MAJOR	6.1.3	21-12-2017	Closed. 13-02-2018
1569381-201712-N1	Minor	5.1.3	21-12-2017	Closed. 19-12-2018

1569381-201712-N2	Minor	5.2.4	21-12-2017	Closed. 19-12-2018
1569381-201712-N3	Minor	5.4.1	21-12-2017	Closed. 19-12-2018
1722078-201812-M1	MAJOR	4.7.2	22 Dec 2018	Closed. 13-02-2019
1722078-201812-M2	MAJOR	3.2.ii) General CoC requirements for the supply chain.	22 Dec 2018	Closed. 13-02-2019
1722078-201812-M3	MAJOR	5.8.2 General CoC requirements for the supply chain.	22 Dec 2018	Closed. 13-02-2019
1722078-201812-M4	MAJOR	5.13.2 General CoC requirements for the supply chain.	22 Dec 2018	Closed. 13-02-2019
1722078-201812-M5	MAJOR	5.13.3 General CoC requirements for the supply chain.	22 Dec 2018	Closed. 13-02-2019
1722078-201812-N1	Minor	4.7.5	22 Dec 2018	Closed on 14/12/2019
1722078-201812-N2	Minor	4.7.7	22 Dec 2018	Closed on 14/12/2019
1722078-201812-N3	Minor	5.3.3	22 Dec 2018	Closed on 14/12/2019
1861406-201911-M1	Major	3.6.2	14/12/2019	Closed on 20/02/2020
1861406-201911-M2	Major	5.3.2 SCCS	14/12/2019	Closed on 20/02/2020
1861406-201911-M3	Major	5.6.1 SCCS	14/12/2019	Closed on 20/02/2020
1861406-201911-M4	Major	4.1.1	14/12/2019	Closed on 20/02/2020
1861406-201911-M5	Major	4.2.1	14/12/2019	Closed on 20/02/2020
1861406-201911-M6	Major	6.7.3	14/12/2019	Closed on 20/02/2020
1861406-201911-N1	Minor	6.2.7	14/12/2019	"Open"

3.5 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 **Ukui II POM – PT. Inti Indosawit SUBur** Certification Unit’s environmental and social performance, legal and any known dispute issues.

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

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

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

List of Stakeholders contacted	
Internal Stakeholders <ul style="list-style-type: none"> - Worker Union 	Union/Contractors <ul style="list-style-type: none"> - Representative of Air Putih Villagers and Ukui II Villagers - Previous Land Owner
Government Departments <ul style="list-style-type: none"> - Plantation and Forestry Agency, Pelalawan Regency. - National Land Agency of Pelalawan Regency - Manpower agency of Pelalawan Regency - Environmental Agency of Pelalawan Regency 	NGO <ul style="list-style-type: none"> - WWF Indonesia (by email, no respond) - Forest Watch Indonesia (by email, no respond) - Sawit Watch Indonesia (by email, no respond)

	Stakeholders comment
#1	<p>Feedbacks: Dinas Perkebunan dan Kehutanan Kabupaten Pelalawan (Plantation and Forestry Agency of Pelalwan Regency) Cannot be visited in place because the Head of Office attended the meeting with Pelalawan Regent.</p> <p>Management Responses: None</p> <p>Audit Team Findings: None</p>
#2	<p>Feedbacks: Badan Pertanahan Nasional Kabupaten Pelalawan (National Land Office of Pelalawan Regency) Interview is done by phone</p> <p>HGU certificate belongs to Ukui I, HGU No.01 issued by "Kantor Pertanahan Kabupaten Kampar" on 12/18/1989 based on "SK Kepala BPN No.04/HGU/1989" dated 04/27/1989 for 6,727.4 Ha as per "Surat ukur"/measurement minutes No.53/1988. HGU is valid until 12/31/2019.</p> <p>Process on renewal of Land Use Title (HGU) certificate No. 01 Year 1989, expired on 31st December 2019 shall be monitored.</p> <p>Management Responses: The HGU certificate has been extended based on decree of National Land Agency Head No. 156/SK/BPN/2004 November 11, 2004 an area of 6,726.255 Ha.</p> <p>Against SK HGU has been made registration to the BPN Regency extension of the pelalawan in accordance affidavits Land Registry No. 35/2019 on September 16, 2019 acres of 6.726,255 HA, so there was a reduction total area of an area of 1,385 HA.</p> <p>The reduction of extents HGU on the SKPT (Surat Keterangan Pendaftaran Tanah) caused by the release of some rights for the construction of high-voltage electricity network tower of 1,385 HA.</p>

	<p>The process further on the decree extension of hgu who have been registered is konstatasi or measurement over the land control of the re-that is currently being berporoses in the office region of Riau province.</p> <p>Audit Team Findings:</p> <p>Audit team will continue to monitor PT Inti Indosawit Subur - Ukui Group related to Process on renewal of Land Use Title (HGU) certificate.</p>																																																																												
<p>#3</p>	<p>Feedbacks: Dinas Tenaga Kerja Kabupaten Pelalawan (Manpower Agency of Pelalawan Regency). Cannot be found in place because the Head of Office attended the Provincial Disnaker meeting related to mediation of industrial relations dispute in Pekanbaru</p> <p>Management Responses: None</p> <p>Audit Team Findings: None</p>																																																																												
<p>#4</p>	<p>Feedbacks: Badan Lingkungan Hidup Kabupaten Pelalawan (Environment Agency of Pelalawan Regency) Bpk. Demsi Surizal (Head of Environmental Protection Section)</p> <ul style="list-style-type: none"> - PT IIS (Ukui Group) consistently sends the Report of environmental management and monitoring every six (6) months, hazardous waste (LB3) management reports every 3 months and land application monitoring report every 3 months. - During 2019, there were no report from public related to environmental pollution caused by operational of PT IIS (Ukui Group). <p>Plasma Ukui I and II:</p> <ul style="list-style-type: none"> - Training needs to be held related to training for environmental control and management particularly about hazardous waste handling in Plasma Ukui I and II. - More effective communication can be established with the relevant agencies to better understand environmental management and hazardous waste - Preparation of replanting should be prioritized, especially associated with sppl for the whole plasma farmers. - On the dry season in order to do control and fires of land plantations and land communities surrounding plantations. <p>Management Responses:</p> <ul style="list-style-type: none"> - For the positive things that have been done will be be maintained and improved by the management to be better in the future. - Regarding the application of LB3 TPS in Ukui I and II plasma, the plasma will prepare human resources to be able to attend training related to hazardous waste handling. - The preparation of the replanting are well prepared and up to now being is being progress. <p>Replanting program of Kebun Plasma Ukui has been established. Replanting program starts in year 2017 and will be done in 2028. Replanting program for all smallholders of Kebun Plasma Ukui are as follow:</p> <p>Detail of replanting program per KUD:</p> <table border="1" data-bbox="331 1854 1251 2040"> <thead> <tr> <th rowspan="2">No</th> <th rowspan="2">SP</th> <th rowspan="2">KUD</th> <th rowspan="2">Ha</th> <th colspan="6">Year</th> </tr> <tr> <th>2017</th> <th>2018</th> <th>2019</th> <th>2020</th> <th>2021</th> <th>2022</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>1A</td> <td>Sumber Makmur</td> <td>1,562</td> <td>-</td> <td>-</td> <td>-</td> <td>438</td> <td>230</td> <td>322</td> </tr> <tr> <td>2</td> <td>2A</td> <td>Bina Usaha Baru</td> <td>616</td> <td>472</td> <td>-</td> <td>100</td> <td>44</td> <td>-</td> <td>-</td> </tr> <tr> <td>3</td> <td>3A</td> <td>Bakti</td> <td>448</td> <td>-</td> <td>-</td> <td>224</td> <td>224</td> <td>-</td> <td>-</td> </tr> <tr> <td>4</td> <td>3BC</td> <td>Karya Bersama</td> <td>864</td> <td>-</td> <td>-</td> <td>250</td> <td>348</td> <td>266</td> <td>-</td> </tr> <tr> <td>5</td> <td>4A</td> <td>Sawit Subur</td> <td>908</td> <td>-</td> <td>538</td> <td>250</td> <td>120</td> <td>-</td> <td>-</td> </tr> <tr> <td>6</td> <td>5A</td> <td>Bina Sejahtera</td> <td>1,236</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>262</td> <td>356</td> </tr> </tbody> </table>	No	SP	KUD	Ha	Year						2017	2018	2019	2020	2021	2022	1	1A	Sumber Makmur	1,562	-	-	-	438	230	322	2	2A	Bina Usaha Baru	616	472	-	100	44	-	-	3	3A	Bakti	448	-	-	224	224	-	-	4	3BC	Karya Bersama	864	-	-	250	348	266	-	5	4A	Sawit Subur	908	-	538	250	120	-	-	6	5A	Bina Sejahtera	1,236	-	-	-	-	262	356
No	SP					KUD	Ha	Year																																																																					
		2017	2018	2019	2020			2021	2022																																																																				
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4	3BC	Karya Bersama	864	-	-	250	348	266	-																																																																				
5	4A	Sawit Subur	908	-	538	250	120	-	-																																																																				
6	5A	Bina Sejahtera	1,236	-	-	-	-	262	356																																																																				

7	6A	Sumber Bahagia	1,206	-	-	300	280	290	336
8	Ukui-II	Bukit Potalo	494	-	-	-	-	-	-
9	R.Seko	Usaha Baru	494	-	-	-	-	-	-
10	1B	Tani Subur	780	-	-	-	-	246	264
11	2B	Karya Tani	734	-	-	-	-	-	-
12	3B	Mekar Abadi	574	-	-	-	-	-	-
13	4B	Trani Maju	962	-	-	-	-	-	-
14	5B	Tani Bahagia	1,366	-	-	-	-	-	-
15	6B	Usaha Tani	1,292	-	-	-	-	-	-
Total			13,536	472	538	1,124	1,454	1,294	1,278

No	SP	KUD	Ha	Year					
				2023	2024	2025	2026	2027	2028
1	1A	Sumber Makmur	1,562	322	250	-	-	-	-
2	2A	Bina Usaha Baru	616	-	-	-	-	-	-
3	3A	Bakti	448	-	-	-	-	-	-
4	3BC	Karya Bersama	864	-	-	-	-	-	-
5	4A	Sawit Subur	908	-	-	-	-	-	-
6	5A	Bina Sejahtera	1,236	374	244	-	-	-	-
7	6A	Sumber Bahagia	1,206	-	-	-	-	-	-
8	Ukui-II	Bukit Potalo	494	-	-	-	-	-	494
9	R.Seko	Usaha Baru	494	-	-	-	-	-	494
10	1B	Tani Subur	780	270	-	-	-	-	-
11	2B	Karya Tani	734	-	254	126	178	176	-
12	3B	Mekar Abadi	574	-	-	-	220	354	-
13	4B	Trani Maju	962	-	390	268	304	-	-
14	5B	Tani Bahagia	1,366	-	-	334	228	426	378
15	6B	Usaha Tani	1,292	-	-	380	244	366	302
Total			13,536	966	1,138	1,108	1,174	1,322	1,668

- PT IIS has reported fire incident inside HGU area or around to Dinas Perkebunan Kabupaten Pelalawan. During period 2017 there was no fire incident inside or around HGU area of PT IIS.
- Noted that there is no land conflict reported between the company and the surrounding communities.

Audit Team Findings:

Audit team will continue to monitor PT Inti Indosawit Subur - Ukui Group related to environment management and monitoring performance.

Especially associated with replanting program will be done verification every audit visit.

#5

Feedbacks:

Perangkat Desa Desa Air Putih dan Ukui II (Local communities and villagers)

Bpk. Seti Winarno (Head of Air Putih Village)

Bpk. Tarmizi (Head of Ukui II Village)

- Generally, the communication between the village government or local community and company has going well.
- The company has always responded to each problem or issue submitted by government officials from village and surrounding communities.
- The Company has realized a CSR program to the local community and involve them in the CSR program planning process in each village. However, need more intensive communication to make it harmonize with ADD program.
- Surrounding communities feels positive due to benefits from the presence of the company, for the maintenance of road infrastructure, public health, education and community economic development (trainings on productive enterprises).
- There was no report from the community working in the company related to forced labor practices by the company.
- Employees working at PT IIS (Ukui Group) have received the wages as determined by the government.
- Communities has understood the rules of the company prohibiting the acceptance of underage workers / child laborers.

	<p>- Maintenance transport access roads for transportation of FFB and CPO.</p> <p>Management Responses:</p> <p>The company has made a road maintenance program through CSR programs that are conducted twice a year. Maintenance of this road consists of the formation of roads, hardening using rock and road compacting.</p> <p>Access road maintenance FFB and CPO carried out scheduled, every 4 months once done using heavy equipment (motor grader) good maintenance or hoarding the road and compacter. In the dry season done watering the road every day (in the morning and evening).</p> <p>Audit Team Findings:</p> <p>Audit team will continue to monitor PT Inti Indosawit Subur - Ukui Group related to manpower and communications and transparency information.</p>
<p>#6</p>	<p>Previous Land Owner Bpk. Atan K and H. Syarif in Desa Ukui II</p> <ul style="list-style-type: none"> - There is no land disputes occurred within the plantation area for the last 3 years. The plantation was developed along with the scheme smallholder surrounding the plantation. There was no land compensation since area designation was clean and clear. - The process of land compensation is carried out by the company has been in accordance with the procedures and social approach methods. The process of indemnity through discussion with the rest of landlord, land owner representative (appointed by the community), the leaders of the community and the local government (head of the village) as well as witnesses - The last process of land compensation carried out was in 2017 related to the acquisition of land for the road for FFB and CPO transportation along 2 km which are in the area plasma Soga Estate. <p>Management Responses:</p> <p>For the positive things that have been done will be be maintained and improved by the management to be better in the future.</p> <p>Audit Team Findings:</p> <p>Audit team will continue to monitor PT Inti Indosawit Subur - Ukui Group related to land land compensation and or land dispute.</p>
<p>#7</p>	<p>Feedbacks: Workers Union Bpk. Zaenal Arifin Bangun (Chairman of the Workers Unions)</p> <ul style="list-style-type: none"> - The Company has realized Normative Rights of employees such as remuneration in accordance with applicable regulations, Allowance/THR, BPJS Program. - Legally SPSI members is a labor consist of SKU labor and also staff however operationally SPSI also consider the problems that occur at the level of non permanent workers/PHL. - Non permanent workers has had a Labour Agreement (SPK) with the company. - Performance appraisals are conducted once a year as management considerations for evaluation, promotion and rotation. - There is no indication that the company conducted discrimination against its workers. - The company has provided Personal Protective Equipment (PPE) for all workers. - The company has providing facilities for employees adequately for example housing, water, electricity, toilets, Sanitation, School Bus, clinics, places of worship. - The Company has registered all the workers in BPJS program (Employment and Health BPJS) including PHL (non-permanent employees). - There has never happened employees demonstration to the company management. - The Company has provided wages in accordance with existing regulations.

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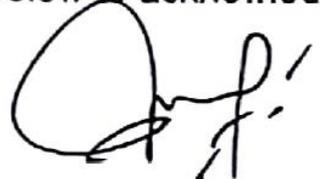
	<ul style="list-style-type: none"> - There is no indication of the company in violation of Human Rights. - There is no indication of forced or coercive labor practice of work. - “Lembaga kerjasama Bipartit (LKS Bipartit)"/Cooperation Institution has been established as a medium of communication between the company and employees.
	<p>Management Responses:</p> <p>For the positive things that have been done will be maintained and improved by the management to be better in the future.</p>
	<p>Audit Team Findings:</p> <p>The company has maintained good management of occupational and social policy, all feedback from workers union are positive as well as previous assessment, audit team acknowledge the positive feedback.</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
Atan	> 20 years	2 Ha	Yes	Yes	Yes
H. Syarif	> 20 years	3.5 Ha	Yes	Yes	Yes

Previous land owner / user comment	
1	<p>Feedbacks:</p> <ul style="list-style-type: none"> - There is no land disputes occurred within the plantation area for the last 3 years. The plantation was developed along with the scheme smallholder surrounding the plantation. There was no land compensation since area designation was clean and clear. - The process of land compensation is carried out by the company has been in accordance with the procedures and social approach methods. The process of indemnity through discussion with the rest of landlord, land owner representative (appointed by the community), the leaders of the community and the local government (head of the village) as well as witnesses - The last process of land compensation carried out was in 2017 related to the acquisition of land for the road for FFB and CPO transportation along 2 km which are in the area plasma Soga Estate. <p>Management Responses: -</p> <p>Audit Team Findings: Comply</p>

3.6 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	
<p>The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that Ukui II POM – PT. Inti Indosawit Subur has complied with the RSPO Supply Chain Certification Standard (June 2017) and audit criteria identified within the audit report. It is deemed that the management system continues to achieve its intended outcomes. Therefore, it is recommended that the certification of Ukui II POM – PT. Inti Indosawit Subur is continued.</p>	
Report prepared by	Acceptance of Assessment Conclusion
Name: Yudwi Wisnu Rahmanto	Name: Armstrong V.S
Company Name: On behalf of BSI Services Malaysia Sdn. Bhd.	Company Name: PT. Inti Indosawit Subur – Ukui.2
Title: Lead Auditor	Title: Group Manager
Signature: 	Signature: below to acknowledge 
Date: 16 March 2020	Date: 16 March 2020

Appendix A: Summary of Findings

Criterion / Indicator	Assessment Findings	Compliance	
<p>Principle 1: Behave ethically and transparently Drive ethical business behaviour, build trust and transparency with stakeholders to ensure strong and healthy relationships.</p>			
<p>Criteria 1.1 The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.</p>			
<p>1.1.1</p>	<p>(C) Management documents that are specified in the RSPO P&C are made publicly available.</p>	<p>Company has a set of publicly available document in form of “Daftar Dokumen dan Informasi Untuk Diakses Publik PT Inti Indosawit Subur” dated 21 August 2017. The provision of publicly available document segregates based on stakeholder category: Government, community and NGO: AMDAL document, RKL/RPL report, Social Impact Assessment, HCV identification and monitoring report, land permit (Izin Lokasi – location permit, Izin Prinsip – principle permit, HGU/land title certificate), environmental permit, palm oil mill machinery permits and licenses, safety committee report, plantation business progress report, conservation management plan document, environmental management program, corporate social responsibility/CSR documents, FFB price, forest and land fire fighting report, ground water use report, tax and retribution payment documents, radio station permit, company policies, continuous improvement program, social procedures, hazardous waste handling report, POME land application permit and report, manpower report, employee’s medical check up result, physical and chemical analysis of river water, land compensation report, public summary report.</p> <p>A number of documents are determined to be available for public, with approval from management:</p> <ul style="list-style-type: none"> • Report on the Implementation of the RKL-RPL every 6 months (environmental management and monitoring report); 	<p>Comply</p>

		<ul style="list-style-type: none"> • Report on B3 waste balance every 3 months (hazardous waste balance report); • Reports of liquid and solid waste every 3 months (solid and liquid waste report); • Report on the use of surface and underground water every once a year (Underground and surface water usage report); • P2K3 report every 3 months period (health and safety report); • Mandatory Report Labor every year once a year (manpower report); • Plantation business progress report every 1 year period (plantation business progress report); • Reports on the results of high conservation value monitoring (high conservation value monitoring report); • Report on monitoring and preventing land fires every 6 months (land fire monitoring and prevention activity report); • Employee's medical checkup result; • Report on air emissions (air emission test report); • Report on river physical and chemical analysis (river water's physical and chemical test results); <p>Ukui-2 Smallholder: The Smallholder Manager has determined type of documents which can be accessed by public, that covers:</p> <ul style="list-style-type: none"> • Copies of Sertifikat Hak Milik (SHM) – and ownership certificate. • Group working Program • HCV • Standar Operational Procedure of Good Agriculture Practices. • Social Impact Assessment (SIA). • Social Activity Documents. 	
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		<ul style="list-style-type: none"> Local Development Documents. Prices of Fresh Fruit Bunches 	
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders.	<p>Company has a set of publicly available document in form of "Daftar Dokumen dan Informasi Untuk Diakses Publik PT Inti Indosawit Subur" dated 21 August 2017. The provision of publicly available document segregates based on stakeholder category.</p> <p>PT IIS-UKUI 2 was provided an Information in appropriate languages (Bahasa Indonesia) it can be understood and accessible by relevant stakeholders.</p> <p>Ukui-2 Smallholder:</p> <p>Ukui smallholder set of publicly available document in form of "Daftar Dokumen yang Dapat Di Akses" updated on 2 January 2019. The list of information is provides on Indonesian language, so can be understood by all stakeholder.</p> <p>Based on interview with surroundings stakeholder (e.g head of village, community group and contractor of transport FFB can be understood of that list.</p>	Comply
1.1.3	(C) Records of requests for information and responses are maintained.	<p>The company has established procedure to handle stakeholder information request in "SOP Penanganan Permintaan Informasi Stakeholder" (SOP No. AA-GL-5008.1-RI, Rev. 1) dated 22 August 2011. The procedure described that information request can be receive by oral or written, or by representative of communities; the company will responded according to respective authorities, starts from Humas (public relation), Estate/Mill manager, Group Manager and Regional Office. The company has set time to respon information request on 14 working days.</p> <p>Company maintains record of information request and response/information logbook. Records of information was kepted for minimum three (3) years. Below are seen and verified Sample:</p> <ul style="list-style-type: none"> P2K3 Activities Report (Safety Committee report) Ukui I and II Palm Oil Mill Period July - September 2019 KSL and KSA, sent to Manpower Agency 	Comply

		<p>of Riau Province on 10 October 2019.</p> <ul style="list-style-type: none"> • Report on Environment Management and monitoring (UKL-UPL) Measuring Palm Oil Mill I, KSA and KSL period January - June 2019, sent to the Environment Agency of Pelalawan Rgency. on 6 September 2019. • Report on the Implementation of Land Applications and Utilization of Solid Waste (Land Application report) Measure I and II Palm Oil Mill, KSA and KSL period January – March 2019, sent to the Environment Agency of Pelalawan Regency on 24 April 2019. • Report on the Implementation of Land Applications and Utilization of Solid Waste (Land Application report) Assess the Palm Oil Mill, KSA and KSL period from April - June 2019, sent to the Environment Agency of Riau Province on 12 July 2019. • Hazardous waste management report (Laporan LB3) period July - August 2018, sent to the Environment Agency of Pelalawan Regency on 14 August 2018. • Plantation Business Development Report period July – December 2018, sent to Plantation Agency of Pelalawan Regency on 25 January 2019. • PT IIS High Conservation Value Plant and Animal Monitoring Report Ukui I period January - June 2019 has been sent to BKDSA Provincy of Riau, dated 10 July 2019. • Request for information from Head of Bagan Limau Village on 24 January 2019 by letter no. 005/UM/BL/I/2019/147 related invitation for anniversary celebration of Pasar Sempurna and has responded on 25 January 2019. • Request for information from DLH (Pekanbaru Environmental Agency) on 17 October 2018 by letter no. UN.69/K.6/BIDTEK/B.3/KSA.1.2/02/2019 related invitation invitation to a joint commitment meeting to save the Sumatran Elephant in the Giam Siak Kecil Wildlife Sanctuary, Balai Raja 	
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		<p>Wildlife Reserve and the Surrounding Area of Tesso Nilo National Park, have responded on 6 February 2019 by visit to the DLH Kab. Pelalawan office on 8 February 2019.</p> <p>Ukui-2 Smallholder:</p> <p>All information request were documented in Logbook of "Catatan Permintaan Informasi dan Tanggapan". Up to November 2019, there were 25 information request, e.g.:</p> <ul style="list-style-type: none"> Request for information from chairman of KUD Sumber Makmur on 30 July 2019 through letter no. 019/KUD-SM/VII/2019 related to requests for assistance copy map coordinates plasma SP1 farmers group, has responded on 30 July 2019 Request for information from Chairman KUD Tani Subur on 4 April 2019 through letter no. 12/KUD.TS/IV/2019 related requests for assistance bus transport, has responded on 4 April 2019 by sending the bus to the KUD Tani Subur office. 	
1.1.4	<p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official.</p>	<p>Company has developed a communication procedure under "Mekanisme Penanganan Permintaan Informasi Stakeholder" (No. SOP; AA-GL-5008.1-R1) dated 22 August 2011. The procedure described that information request can be receive by oral or written, or by representative of communities; the company will responded according to respective authorities, starts from Humas (public relation), Estate/Mill manager, Group Manager and Regional Office. The company responses against all information request sent by stakeholders including response time of 14 working days after information request accepted. In addition, record related to information request and company response kept and maintained for three (3) years.</p> <p>Based on public stakeholder consultation with KUD/cooperative chairman, local contractor, NGO and public official, it was revealed that company has</p>	Comply

		<p>communicating in good manner. Company also provide response to information request in accordance to authority and the communication SOP.</p> <p>Ukui-2 Smallholder:</p> <p>The Smallholder Manager has established mechanism for communication and consultation "Mekanisme Komunikasi dan Konsultasi" dated 16 January 2017, shaped flow Chart that describes the process of incoming information requests up to the responses provided.</p> <p>Based on interview with sampled individual members, they have understood the rules for consultation and communication.</p> <p>Each smallholder member has "Buku Panduan dan Catatan Petani Plasma", whereas explains the flow process of consultation and communication. Both of communication by written or verbal communication to group management are acceptable.</p>	
1.1.5	There is a current list of contact and details of stakeholders and their nominated representatives.	<p>List of stakeholders updated in July 2019, there were 3 types of stakeholders i.e: government (agency office in Pelalawan Regency, Kapolsesk Ukui, Camat Ukui, head of village), Kebun Masyarakat (20 smallholders) and NGO (WWF, Scale Up). The stakeholder list completed with name of chairman, address and contact number. List of information that can be access by relevant stakeholders available in indicator 1.2.1</p> <p>The list of stakeholder list updated annually by Public Relation. Last update performed in 2 January 2018, consist of 37 stakeholders which related to company operation, as follows:</p> <ul style="list-style-type: none"> - <u>Government institution</u>, consist of Surrounding villages, District Head, and related agency of Pelalawan Regency (Dinas Lingkungan Hidup, Dinas, Perkebunan, Dinas Tenaga Kerja, BPN). - <u>Chairman</u> of Koperasi Unit Desa (KUD) which under company scheme 	Comply

		<p>smallholder.</p> <ul style="list-style-type: none"> - <u>Informal institution</u> around the company, e.g. FK-KPPS, GWKAK, Worker Union and WKAK. - <u>NGO around</u> the company i.e: WWF, Scale Up, etc. ‘ <p>Ukui-2 Smallholder:</p> <p>The Smallholder Manager has consistently updated the list of stakeholders, the last update performed on 2 January 2019, where there are 56 stakeholder, e.g:</p> <ol style="list-style-type: none"> 1. Stakeholders from PT IIS (9 stakeholders) 2. Stakeholders from local government (18 stakeholders) 3. Stakeholders related agency in Pelalawan Regency (5 stakeholders) 4. Stakeholder from banks (6 stakeholders) 5. Stakeholder from KUD (18 stakeholders). 	
<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>PT Inti Indosawit Subur has revised the company policy by including commitment to a code of ethical business conduct, it was signed by Managing Director on 1 December 2014. The policy has been disseminated to all employees by installing signboard of company policy and by direct dissemination, e.g.:</p> <ul style="list-style-type: none"> • In 2019, dissemination has performed on 13 February 2019 attended by 32 personnel from KSA Estate, on 10 April 2019 attended by 28 personnel at KSL. List of attendance was available at the time of audit. • In 2018, dissemination has been performed on 13 October 2018 and 	<p>Comply</p>

		<p>ware attended by 68 personel from Ukui Estate (Afdeling 1 to 5).</p> <ul style="list-style-type: none"> • At PMKS Ukui 2 the company policy including of ethical business conduct has performed on 15 October 2018 and attended by 50 personel. • In 2017, dissemination has done on 19 October 2017, attended by 76 personnels from Ukui 2 Mill. <p>In the recruitment process policies have been applied related to business ethics, which are stipulated in the Work Agreement Letters both PHL, PKWT and in the Collective Labor Agreement (PKB).</p> <p>In the Daily worker Agreement and PKWT Work Agreement, it is also explained in relation to company policy stated in appendix 1, that is:</p> <p>Disgraceful Acts / Actions of Workers That Result in the Termination of the Work Agreement; "Committing and / or directly or indirectly involved in a fraud and / or theft and / or embezzlement of goods and / or money belonging to the company, embezzling company money, accepting gifts from other parties due to work results. <i>"Perbuatan/Tindakan Tercela Tenaga Kerja yang Mengakibatkan Berakhirnya Perjanjian Kerja; "Melakukan dan/atau terlibat langsung maupun tidak langsung dalam suatu penipuan dan/atau pencurian dan/atau penggelapan barang dan/atau uang milik perusahaan, Menggelapkan uang milik perusahaan, meneripa uang pemberian dari pihak lain karena hasil kerja"</i>.</p> <p>At the recruitment process has been applied policy related to business ethics and also set forth in the letter of the work agreement both PHL, PKWT and in PKB.</p> <p>In the daily worker agreement and the PKWT work agreement, it is also explained in relation to the company policy stated in Appendix 1; Occupational action/actions that resulted in the expiration of the employment agreement; "Doing and/or engaging directly or indirectly in a fraud and/or theft and/or</p>	
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		<p>embezzlement of the company's goods and/or money, darkening the company's money, terrorize the awarding of the other party due to work</p> <p>PKB period 2018-2020 has explained related to business ethics in article XXII about "Obligations of The Company and Employees"; including: employers and workers are obliged to maintain good character and do not contradict the legal norms and moral values, employers and workers are obliged to comply with and enforce all regulations and legislation on Applicable employment.</p> <p>Ukui-2 Smallholder:</p> <p>The Smallholder Manager already has a Code of Ethical Business Policy that included on "Kebijakn Manajer Group ICS" signed on 16 January 2017, and has been disseminated to each member through the "Kegiatan Refresh Pelatihan ICS" was performed om 3 August 2019 attnded by 80 farmers where in point 2 stated "Committed to ethical conduct in business in overall transactions and business operations, prohibition all forms of corruption, bribery and fraud in the use of funds and resources".</p> <p>Document verification shows that all farmer members have stated approval of all policy issued by Smallholder Manager, including policy related to code of ethic which described in the Agreement Letter. Document seen.: Member of KUD Trani Jaya and KUD Mekar Abadi as many as 682 kavling (plot) have signed Cooperation Agreement for example; Jumar (KUD Mekar Jaya, KT: 248, No. Kav.: 5654), Uden (KUD Mekar Jaya, KT: 248, No. Kav.: 5654), Kasan (KUD Mekar Jaya, KT: 248, No. Kav.: 5654), Mugi (KUD Mekar Jaya, KT: 248, No. Kav.: 5654); KUD Trani Maju namely Samuri (KUD Trani Maju, KT: 217, No. Kav.: 3835), Suyanto (KUD Trani Maju, KT: 217, No. Kav.: 3825), the agreement signed on 16 January 2017 and valid until 2 December 2021.</p>	
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		Based on interview with smallholders shows that they have a good understanding of the Code of Business Conduct policy issued by the Smallholder Manager.	
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.	<p>The Company - UKUI Group (including scheme smallholder) has implemented business conduct policy to seluruh employees, it is repeated an in employment contract with PKB employees period 2018-2020. Describes on article XXII about "Kewajiban Perusahaan dan Pekerja"; these included: <i>Pengusaha dan pekerja berkewajiban memelihara budi pekerti yang baik dan tidak bertentangan dengan norma hukum dan nilai susila, Pengusaha dan pekerja berkewajiban mematuhi dan menjalankan segala peraturan dan perundangan tentang ketenagakerjaan yang berlaku.</i></p> <p>At the recruitment process has been applied policy related to business ethics and also set in the letter of the work agreement both PHL, PKWT and in PKB.</p> <p>In the daily worker agreement and the PKWT work agreement, it is also explained in relation to the company policy stated in Appendix 1; Occupational action/actions that resulted in the expiration of the employment agreement; "Doing and/or engaging directly or indirectly in a fraud and/or theft and/or embezzlement of the company's goods and/or money, darkening the company's money, terrorize the awarding of the other party due to work</p> <p>Based on the interview with some employees and stakeholders, that they have understood linked to the the company's policy.</p>	Comply
<p>Principle 2: Operate legally and respect rights Implement legal requirements as the basic principles of operation in any jurisdiction.</p>			
<p>Criteria 2.1 There is compliance with all applicable local, national and ratified international laws and regulations.</p>			
2.1.1	(C) The unit of certification complies with applicable legal requirements.	Unit of certification within this scope are UKUI-II Mill supplied by SOGA Estate, SEI LALA Estate and 6 Smallholders Cooperatives. Legal requirements of land use rights in Indonesia is recognize as "Hak Guna Usaha" or Land Title. Where	Comply

the Land Title issued by National Land Department. The legal land use-rights for this scope as follow:

Estates	Area (Ha)*	Land Title
Soga	2,988	HGU Certificate No. 013, 6 Jul 2009. Exp: 9 Jun 2044. Total area: 2,704.22 Ha. SK. Ka. BPN RI No: 78-HGU-BPN RI-2008, dated 19 Dec 2008.
Sei Lala	3,178	HGU Certificate No. 016, 3 Nov 2010. Exp: 3 Nov 2045. Total area: 299.51 Ha. (remain area is from HGU certificate No. 01 Year 1989 with area 6,727.40 Ha) SK Ka. BPN No: 156/HGU/BPN/2004, dated 11 November 2004.
Smallholders	Area (Ha)*	Land Title
KUD Tani Subur	780	SHM (Certificate of Land Ownership)
KUD Karya Tani	734	SHM (Certificate of Land Ownership)
KUD Mekar Abadi	574	SHM (Certificate of Land Ownership)
KUD Trani Maju	962	SHM (Certificate of Land Ownership)
KUD Tani Bahagia	1,366	SHM (Certificate of Land Ownership)
KUD Usaha Tani	1,292	SHM (Certificate of Land Ownership)
TOTAL	11,874	

* based on Area Statement November 2019.

2.1.2	A documented system for ensuring legal compliance is in place. This system has a means to track changes to the law and also includes listing and evidence of legal due diligence of all contracted third parties, recruitment agencies, service providers and labour contractors.	"Evaluasi Kepatuhan Hukum, dated 28 May 2019". Documented system for ensuring legal compliance and to track changes of the law through procedure "SOP Pemenuhan Peraturan Perundang-undangan dan Perubahannya" AA-GL5001.1-R0 dated 5 December 2009.	Comply
2.1.3	Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.	"Monitoring Pemeriksaan Patok Batas for SK HGU No: 78-HGU-BPN RI-2008" dated 20 June 2019. There is 31 legal boundary pegs are demarcated and visibly. During field observation, there is no planting beyond the legal boundaries.	Comply
<p>Criteria 2.2 All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.</p>			
2.2.1	A list of contracted parties is maintained.	<p>PT IIS-UKUI Group has a list of contracts and is well preserved in the format "Monitoring Pembuatan SPK dan Pembayaran BAP periode February – October 2019", there are 9 TBS transport contractors and a vacant EFB. Monitoring is monitored for job type, job period, job progress as well as the status of BAP/payment of contracts.</p> <p>For example:</p> <ul style="list-style-type: none"> - Palm Oil Empty Fruit Bunch (EFB) Transportation Working Agreement no. 059/E2/KSL/V/2019 dated 30 April 2019 on behalf of Nuryati from Lubuk Kembang Village. - Palm Oil Empty Fruit Bunch (EFB) Transportation Working Agreement no. 064/E2/KSL/V/2019 dated 30 April 2019 on behalf of Saringun from Lubuk Kembang Village. - Palm Kernel Carriage Agreement, no. 05/VII/JB-IIS/2019 dated 2 August 2019 on behalf of CV Jasa Bersama. <p>Smallholder – Ukui 2:</p>	Comply

		<p>Plasma Ukui 2 already has and monitors contracts with other parties, including:</p> <ul style="list-style-type: none"> - Surat Perjanjian Armada between Koperasi Unit Desa Usaha Tani Desa Air Putih with Oil Palm FFB Transporter no. 01 / SPKB / UKUI / XI / 1994 on behalf of Bpk. Okta (Desa Air Putih) truck with vehicle no. BM 8244 VU. - Cooperation Agreement between Farmers Participating in PIR-TRANS and PT Inti Indosawit Subur no. 33 / SPKB / UKUI / XI / 1994 dated November 1, 1994, also there are articles that explanation relating to legal requirements and the use of underage workers (children) and the prohibition of practicing forced labor (forced labor) <p>The contract explains the legal requirements related to article 6; Other sectors: fleet owners are obliged: not to use child labor (<18 years), do not discriminate, provide opportunities and treatment at work and do not commit acts of violence and harassment of fellow workers ".</p> <p>Article 7; Obligations: the fleet owner is obliged to obey the regulations and complete the vehicle documents, must wear personal protective equipment when working in the field or when sending FFB to PMKS.</p> <p>Article 8; Ban: fleet owners are prohibited from committing fraud, theft and embezzlement of FFB, are prohibited from sexually harassing coworkers and are prohibited from attacking, abusing funds or intimidating coworkers.</p>	
2.2.2	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.	PT IIS-UKUI Group has a list of contracts and is well preserved in the format " Monitoring Pembuatan SPK dan Pembayaran BAP periode February – October 2019", there are 9 TBS transport contractors and a vacant EFB. Monitoring is monitore for job type, job period, job progress as well as the status of BAP/payment of contracts.	Comply

		<p>For transportation of FFB, PT IIS-Ukui 2 does not use an outside contractor, but instead uses its own unit.</p> <p>In work agreements with second and third parties, company policy explains related: compliance with rules and regulations, discrimination, not working under 18 years of age, business code of ethics. Associated with the applicable legal requirements, are describe in chapter 9; bullete (i) regarding of responsibility: "Guarantee a second party (PT IIS) regarding permits for all equipment (facilities and infrastructure) in accordance with applicable laws and regulations.</p> <p>Smallholder – Ukui 2:</p> <p>Plasma Ukui 2 already has and monitors contracts with other parties, including:</p> <ul style="list-style-type: none"> - Surat Perjanjian Armada between Koperasi Unit Desa Usaha Tani Desa Air Putih with Oil Palm FFB Transporter no. 01 / SPKB / UKUI / XI / 1994 on behalf of Bpk. Okta (Desa Air Putih) truck with vehicle no. BM 8244 VU. - Cooperation Agreement between Farmers Participating in PIR-TRANS and PT Inti Indosawit Subur no. 33 / SPKB / UKUI / XI / 1994 dated November 1, 1994, also there are articles that explanation relating to legal requirements and the use of underage workers (children) and the prohibition of practicing forced labor (forced labor) <p>The contract explains the legal requirements related to article 6; Other sectors: fleet owners are obliged: not to use child labor (<18 years), do not discriminate, provide opportunities and treatment at work and do not commit acts of violence and harassment of fellow workers ".</p>	
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		<p>Article 7; Obligations: the fleet owner is obliged to obey the regulations and complete the vehicle documents, must wear personal protective equipment when working in the field or when sending FFB to PMKS.</p> <p>Article 8; Ban: fleet owners are prohibited from committing fraud, theft and embezzlement of FFB, are prohibited from sexually harassing coworkers and are prohibited from attacking, abusing funds or intimidating coworkers.</p>	
2.2.3	<p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.</p>	<p>PT IIS-UKUI Group has a list of contracts and is well preserved in the format " Monitoring Pembuatan SPK dan Pembayaran BAP periode February – October 2019", there are 9 TBS transport contractors and a vacant EFB. Monitoring is monitored for job type, job period, job progress as well as the status of BAP/payment of contracts.</p> <p>For transportation of FFB, PT IIS-Ukui 2 does not use an outside contractor, but instead uses its own unit.</p> <p>In work agreements with second and third parties, company policy explains related: compliance with rules and regulations, discrimination, not working under 18 years of age, business code of ethics. Associated with the applicable legal requirements, are described in chapter 9; bullete (i) regarding of responsibility: "Guarantee a second party (PT IIS) regarding permits for all equipment (facilities and infrastructure) in accordance with applicable laws and regulations.</p> <p>Smallholder – Ukui 2:</p> <p>Plasma Ukui 2 already has and monitors contracts with other parties, including:</p> <ul style="list-style-type: none"> - Surat Perjanjian Armada between Koperasi Unit Desa Usaha Tani Desa Air Putih with Oil Palm FFB Transporter no. 01 / SPKB / UKUI / XI / 1994 on behalf of Bpk. Okta (Desa Air Putih) truck with vehicle no. BM 8244 VU. 	Comply

		<p>- Cooperation Agreement between Farmers Participating in PIR-TRANS and PT Inti Indosawit Subur no. 33 / SPKB / UKUI / XI / 1994 dated November 1, 1994, also there are articles that explanation relating to legal requirements and the use of underage workers (children) and the prohibition of practicing forced labor (forced labor)</p> <p>The contract explains the legal requirements related to article 6; Other sectors: fleet owners are obliged: not to use child labor (<18 years), do not discriminate, provide opportunities and treatment at work and do not commit acts of violence and harassment of fellow workers ".</p> <p>Article 7; Obligations: the fleet owner is obliged to obey the regulations and complete the vehicle documents, must wear personal protective equipment when working in the field or when sending FFB to PMKS.</p> <p>Article 8; Ban: fleet owners are prohibited from committing fraud, theft and embezzlement of FFB, are prohibited from sexually harassing coworkers and are prohibited from attacking, abusing funds or intimidating coworkers.</p>	
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Criteria 2.3
All FFB supplies from outside the unit of certification are from legal sources.

<p>2.3.1</p>	<p>(C) For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> Information on geo-location of FFB origins Proof of the ownership status or the right/claim to the land by the grower/smallholder Where applicable, valid planting/operating/trading license, or is part of a cooperative which allows the buying and selling of FFB 	<p>Geo-location of FFB supplier:</p> <table border="1"> <thead> <tr> <th rowspan="2">SP</th> <th rowspan="2">DESA</th> <th rowspan="2">KECAMATAN</th> <th rowspan="2">KABUPATEN</th> <th rowspan="2">KUD</th> <th colspan="2">TITIK KOORDINAT</th> </tr> <tr> <th>SOUTH</th> <th>EAST</th> </tr> </thead> <tbody> <tr> <td>1B</td> <td>Sei Beberas Hilir</td> <td>L. Batu Jaya</td> <td>Inhu</td> <td>Tani Subur</td> <td>00° 23' 09.5"</td> <td>102° 07' 52.8"</td> </tr> <tr> <td>2B</td> <td>Sei Beras Beras</td> <td>L. Batu Jaya</td> <td>Inhu</td> <td>Karya Tani</td> <td>00° 23' 14.8"</td> <td>102° 04' 58.7"</td> </tr> <tr> <td>3B</td> <td>Tasik Juang</td> <td>L. Batu Jaya</td> <td>Inhu</td> <td>Mekar Abadi</td> <td>00° 22' 37.3"</td> <td>102° 05' 01.0"</td> </tr> <tr> <td>4B</td> <td>Pontian Mekar</td> <td>L. Batu Jaya</td> <td>Inhu</td> <td>Trani Maju</td> <td>00° 20' 35.3"</td> <td>102° 05' 03.3"</td> </tr> <tr> <td>5B</td> <td>Kulim Jaya</td> <td>L. Batu Jaya</td> <td>Inhu</td> <td>Tani Bahagia</td> <td>00° 22' 50.1"</td> <td>102° 07' 31.0"</td> </tr> <tr> <td>6B</td> <td>Air Putih</td> <td>L. Batu Jaya</td> <td>Inhu</td> <td>Usaha Tani</td> <td>00° 18' 15.6"</td> <td>102° 07' 30.5"</td> </tr> </tbody> </table> <p>Proof of ownership: All smallholders member have land ownership rights. See details in 4.4.1</p>	SP	DESA	KECAMATAN	KABUPATEN	KUD	TITIK KOORDINAT		SOUTH	EAST	1B	Sei Beberas Hilir	L. Batu Jaya	Inhu	Tani Subur	00° 23' 09.5"	102° 07' 52.8"	2B	Sei Beras Beras	L. Batu Jaya	Inhu	Karya Tani	00° 23' 14.8"	102° 04' 58.7"	3B	Tasik Juang	L. Batu Jaya	Inhu	Mekar Abadi	00° 22' 37.3"	102° 05' 01.0"	4B	Pontian Mekar	L. Batu Jaya	Inhu	Trani Maju	00° 20' 35.3"	102° 05' 03.3"	5B	Kulim Jaya	L. Batu Jaya	Inhu	Tani Bahagia	00° 22' 50.1"	102° 07' 31.0"	6B	Air Putih	L. Batu Jaya	Inhu	Usaha Tani	00° 18' 15.6"	102° 07' 30.5"	<p>Comply</p>
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		<p>Trading license:</p> <ul style="list-style-type: none"> - "Surat Izin Usaha Perdagangan" of KUD Mekar Abadi, dated 23 Jan 2019, issued by "Lembaga Pengelola OSS". - "Persetujuan Pemenuhan Komitmen Izin Usaha Perdagangan (SIUP) an. KUD Mekar Abadi, based on "Keputusan Kepala Dinas Penanaman Modal dan Pelayanan Terpadu Satu Pintu (DPMPTSP Kabupaten Indragiri Hulu" No.37/DPMPTSP/SIUP-PK/III/2019 dated 11 Mar 2019. - "Persetujuan Perubahan Anggaran Dasar Koperasi Unit Desa Bakti, based on "Keputusan Menteri Koperasi dan uSaha Kecil dan Menengah No.000851/PAD/M.KUKM.2/XII/2018 dated 17 Dec 2018. - "Nomor Induk Koperasi" (NIK) of KUD Mekar Jaya No.1402070010003 issued by "Menteri Koperasi dan Usaha Kecil dan Menengah" dated 13 Nov 2017. - "Surat Izin Usaha Perdagangan" of KUD Tani Maju, dated 25 Oct 2018, issued by "Lembaga Pengelola OSS". - "Persetujuan Pemenuhan Komitmen Izin Koperasi SIMpan Pinjam an. KUD Trani Maju, based on "Keputusan Kepala Dinas Penanaman Modal dan Pelayanan Terpadu Satu Pintu (DPMPTSP Kabupaten Indragiri Hulu" No.15/DPMPTSP/KSP/I/2019 dated 29 Jan 2019. - "Tanda Daftar Perusahaan Koperasi" No.04062640043 dated 28 Apr 2017, issued by "Badan Penanaman Modal Daerah dan Pelayanan Perizinan Terpadu", valid until 28 Apr 2022. - "Pengesahan Koperasi sebagai Badan Hukum" for KUD Usaha Tani, based on "Surat keputusan Kepala Kantor Wilayah Departemen Koperasi Provinsi Riau No.144/KEP/KWK.4 	
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2.3.2	For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1.	PT Inti Indosawit Subur – Ukui II POM only receive and process FFB from certified supplier, therefore this indicator is not applicable.	Not applicable
<p>PROCEDURAL NOTE: For Implementation Procedure for 2.3.2 refer to Annex 4.</p>			
<p>Principle 3: Optimise productivity, efficiency, positive impact and resilience Implement plans, procedures and systems for continuous improvement.</p>			
<p>Criteria 3.1 There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.</p>			
3.1.1	<p>(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</p>	<p>A business management plan for long term economic feasibility has been documented by the Certificate Holder. The business management plan has include projection of production, quality planting material, mill extraction rates (OER and KER), upkeep cost, harvesting cost, transport cost, forecast price and capital expenditure.</p> <p>Projection of Production:</p>	Comply

RSPO Public Summary Report
Revision 9 (Nov 2019)

Description	FFB					
	2019	2020	2021	2022	2023	2024
Soga Estate	76,892.50	75,993.38	73,713.58	72,239.31	69,349.74	67,269.25
Sei Lala Estate	73,081.00	73,013.89	73,013.89	69,407.00	66,630.72	64,631.80
Ukui Plasma	120,159.95	144,682.71	141,789.05	134,699.60	121,229.64	109,106.68
Total FFB	270,133.45	293,689.98	288,516.52	276,345.91	257,210.10	241,007.73
CPO	56,690.57	62,608.82	60,701.13	58,308.99	54,142.73	50,611.62
PK	15,127.47	16,446.64	15,976.99	15,337.20	14,403.77	13,544.63
OER	20.99	21.32	21.04	21.10	21.05	21.00
KER	5.60	5.60	5.54	5.55	5.60	5.62
Rp/Ton CPO	275.00	262.00	250.00	294.00	319.00	315.00
Rp/Ton TBS	57.65	55.79	56.17	62.05	67.10	66.10

3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available.	<p>The unit of certification was able to demonstrated annual replanting program. Replanting starts at 2022. Replanting Program Soga Estate:</p> <table border="1"> <thead> <tr> <th>Year</th> <th>Replanting Plan (Ha)</th> </tr> </thead> <tbody> <tr> <td>2022</td> <td>195</td> </tr> <tr> <td>2025</td> <td>369</td> </tr> <tr> <td>2027</td> <td>374</td> </tr> <tr> <td>2026</td> <td>436</td> </tr> <tr> <td>2029</td> <td>382</td> </tr> <tr> <td>2024</td> <td>437</td> </tr> <tr> <td>2030</td> <td>399</td> </tr> </tbody> </table>	Year	Replanting Plan (Ha)	2022	195	2025	369	2027	374	2026	436	2029	382	2024	437	2030	399	Comply
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2028	334						
Total	2,926						
3.1.3	The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.	<p>Management review Soga Estate, Sei Lala Estate and Ukui II POM on 12 Jun 2019, attended by Estate Manager, Field Assistant, KTU and Sustainability Assistant. The management review has discussed:</p> <ul style="list-style-type: none"> - Result of internal audit that conducted on 10-13 May 2019; e.g. Governor regulation that has not been evaluated. Internal audit on 10-13 May 2019 at Ukui II POM. Internal Audit Supply Chain on 8 January 2019 and 24 Oct 2019 - Customer feedback: management of Sei Lala Estate and Soga Estate in coordination with SSL and HSE Department in respond to information requested by stakeholder. - Preventive & Corrective Action: conducted evaluation to all regulation; to file all letter from pubic relation; give awareness to Safety Officer to document all risk analysis file. 	Comply				
<p>Criteria 3.2 The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.</p>							
3.2.1	(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.	<p>Action Plan Ukui II POM:</p> <ol style="list-style-type: none"> 1. Social: To address social and environment impact assessment Ukui Group has conducted dissemination on Fire Fighting on 11/09/2019 2. Environment: <ul style="list-style-type: none"> - Initiative Water Management: re-use condensate water and kernel silo heater water; recycle turbine cooler water; recycle lab extraction cooler water. 	Comply				

		<ul style="list-style-type: none"> - Initiative power consumption: install transparent roof; using electricity from PLN; install poka yoke for welder trafo. - Initiative Reduce Shell burnt: keep steam boiler pressure in 8-10 kg/cm2 during night stop press; install airlock feeding ripple mill; transform dry shell 2 to be production shell; standardize boiler equipment (cut off fuel gate, Automatic IDFan & FDFan) <p>3. Operations:</p> <ul style="list-style-type: none"> - Initiative Backhoe Loader: create ramp of boiler ash and standby trailer/Bin; install shell transport fan to shell file. - Initiative reduce dirt: consistent using grading table; install FFB washing; automation of drain sand trap tank. <p>Action Plan Soga Estate:</p> <ul style="list-style-type: none"> • The use of harvesting pole "palm pro" to make harvesting process easier and faster. • Decrease the use of diesel fuel in heavy equipment during empty fruit bunch evacuation, by creating dump truck queues in the evening. <p>Scheme Smallholder:</p> <ol style="list-style-type: none"> 1. Problem: Anticipating illegal FFB loaded. Action: increase supervision of Assistant and Mandor in field by performing special job description, e.g. using % fruit density census, using estate format daily work plan, using fruit quality format (10 market place) and crosscheck hand counter at mill. Status: on going. 2. Percentage of FFB in November 2019 is < 16.64%. Action: conducted field inspection before harvesting, during harvesting and after harvesting. 3. Maintenance of RSPO and training document. Action: updating RSPO documents, conduct training appropriate to work. 4. Spraying team of Plasma shall be according to sustainability standard. Action: completed spraying tools according to sustainability standard, 	
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		fixing administration and working system of spraying team (TUS), established standard warehouse for agrochemical at KUD Bukit Potalo, propose license to Environment Agency for KUD Bukit Potalo.	
3.2.2	As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template.	RSPO Annual Communication of Progress 2019 of PT Inti Indosawit Subur has been available in RSPO website under membership number 1-0022-06-000-00.	Comply
Criteria 3.3			
Operating procedures are appropriately documented, consistently implemented and monitored.			
3.3.1	(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.	<p>Own Estates</p> <p>Estate has had Standard Operational Procedures (SOP) that covering entire operational activity as follows:</p> <ol style="list-style-type: none"> 1. SOP AA-APM-OP-1100.01-R4 dated 5 September 2016: <i>Pembibitan</i> (Nursery). 2. SOP AA-APM-OP-1100.02-R3 dated 10 June 2015: <i>Penanaman Areal Baru</i> (New Planting). 3. SOP AA-APM-OP-1100.03-R2 dated 24 July 2015: <i>Pembuatan dan Perawatan Jalan dan Jembatan</i> (Road and Bridge construction and maintenance); 4. SOP AA-APM-OP-1100.04-R3 dated 7 December 2015: <i>Pembuatan dan Pemeliharaan Parit</i> (Drainage Construction and Maintenance). 5. SOP AA-APM-OP-1100.05-R3 dated 23 November 2016: <i>Konservasi Tanah dan Air</i> (Soil & Water Conservation). 6. SOP AA-APM-OP-1100.06-R6 dated 16 February 2017: <i>Menanam kacang</i> (Planting cover crops). 7. SOP AA-APM-OP-1100.07-R6 dated 16 February 2017: <i>Menanam Kelapa Sawit</i> (Planting Oil Palms). 8. SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i> (Weed control). 9. SOP AA-APM-OP-1100.09. R5 dated 26 December 2018: <i>Pemupukan</i> (Fertilizer application). 	Comply

		<p>10. SOP AA-APM-OP-1100.10. R6 dated 23 November 2016: <i>Pengendalian Hama dan Penyakit</i> (Pests & Disease Control).</p> <p>11. SOP AA-APM-OP-1100.11. R1 dated 1 February 2009: <i>Pestisida dan Pengendaliannya</i> (Pesticide Handling).</p> <p>12. SOP AA-APM-OP-1100.12. R3 dated 23 November 2016: <i>Kastrasi</i> (Palm castration) explain cutting all generative product (mal flower, female flower, all fruit, to support vegetative growth) – done 5-6 months before being harvested.</p> <p>13. SOP AA-APM-OP-1100.13. R3 dated 4 March 2016: <i>Tunas Pokok</i> for (Pruning).</p> <p>14. SOP AA-APM-OP-1100.14. R3 dated 16 February 2017: <i>Sensus dan Identifikasi Pokok</i> (Census and Palm Identification).</p> <p>15. SOP AA-APM-OP-1100.15. R2 dated 1 October 2010: <i>Sensus Produksi</i> (Production Census).</p> <p>16. SOP AA-APM-OP-1100.16. R1 dated 1 February 2009: <i>Konsolidasi Pohon Tumbang</i> (Provision of Support to Fallen Palm).</p> <p>17. SOP AA-APM-OP-1100.17. R1 dated 23 October 2014: <i>Pengelolaan Air</i> (Water Management).</p> <p>18. SOP AA-APM-OP-1100.18.R3 dated 20 April 2015: <i>Potong Buah</i> (Harvesting).</p> <p>19. SOP AA-APM-OP-1100.19.R1 dated 1 February 2009: <i>Pengelolaan Transport</i> (FFB Transport).</p> <p>20. SOP AA-APM-OP-1100.20-R6 dated 1 May 2019: <i>Peremajaan</i> (Replanting).</p> <p>Ukui II POM has documented and implemented procedure related to process of FFB to become CPO and PK, starts from FFB receiving to dispatch of CPO and PK:</p> <p>1. SOP AA-MPM-OP-1400.02.R2 dated 1 September 2011: <i>Stasiun Penerimaan</i> for FFB Receiving Station;</p> <p>2. SOP AA-MPM-OP-1400.03.R1 dated 1 February 2009: <i>Stasiun Rebusan</i> for Sterilizer;</p>	
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		<ol style="list-style-type: none"> 3. SOP AA-MPM-OP-1400.04.R1 dated 1 February 2009: <i>Stasiun Pemisahan Berondolan</i> for Loose Fruit Separation; 4. SOP AA-MPM-OP-1400.05-R1 dated 1 February 2009: <i>Stasiun Pengadukan dan Pengempaan</i> for Pressing Station; 5. SOP AA-MPM-OP-1400.06-R1 dated 1 February 2009: <i>Stasiun Pemurnian</i> for Clarification; 6. SOP AA-MPM-OP-1400.07-R1 dated 1 February 2009: <i>Stasiun Pemisahan Nut dan Fiber</i> for Nut and Fiber Separation; 7. SOP AA-MPM-OP-1400.08-R1 dated 1 February 2009: <i>Stasiun Kernel</i> for Kernel Station; 8. SOP AA-MPM-OP-1400.09-R1 dated 1 February 2009: <i>Stasiun Boiler</i>; 9. SOP AA-MPM-OP-1400.10-R1 dated 1 February 2009: <i>Stasiun Engine Room</i>; 10. SOP AA-MPM-OP-1400.11-R1 dated 1 February 2009: <i>Stasiun Water Treatment</i>; 11. SOP AA-MPM-OP-1400.12-R1 dated 1 February 2009: <i>Laboratorium</i>; 12. SOP AA-MPM-OP-1400.13-R1 dated 1 February 2009: <i>Stasiun Pengelolaan Limbah</i> for Palm Oil Mill Effluent Treatment; 13. SOP AA-MPM-OP-1400.14-R2 dated 1 September 2011: <i>Stasiun Penimbunan dan Pengiriman CPO dan Kernel</i> for CPO and PK Bulking and Despatch Operation; 14. SOP AA-MPM-OP-1400.15-R1 dated 1 February 2009: <i>Perawatan</i> for Preventive Maintenance; 15. SOP AA-MPM-OP-1400.19.R2 dated 1 September 2011: <i>Manajemen dan Metode Menghitung Emisi Gas Rumah Kaca (GHG)</i> 16. SOP AA-MPM-OP-1400.18-R4 Book Keeping 17. AA-MPM-OP-1400.17-R6 Traceability <p>Those document above are available in each units. Based on Manuring Procedures obtain information that to increasing soil fertility and maximizing yield, estates using organic fertilizer beside inorganic.</p>	
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		<p>For example, EFB application with dosage 35 – 50 ton/Ha in normal soil. During the field visit in Block D98a Afdeling IV Soga Estate observed the EFB application in interrows. Through the recap of weighbridge ticket known that 5,712 tonnes (140 Ha) has been delivered to those block or equivalent with 40 ton EFB/Ha. According to that fact, estate has been comply with the procedures.</p> <p>Scheme Smallholder:</p> <p>Scheme smallholder has had best management practices procedure as follows:</p> <ul style="list-style-type: none"> • AA-PLASMA-PP-KS-01 <i>Pembibitan</i> (Nursery) • AA-APM-OP-1100.09-R3 <i>Pemupukan</i> (Manuring) dated 20 April 2015 • AA-PLASMA-PP-KS-04 <i>Potong Buah</i> (Harvesting) • AA-PLASMA-PP-KS-05 <i>Pengangkutan TBS</i> (FFB Transport) • AA-APM-OP-1100.10-R5 <i>Pengendalian Hama dan Penyakit</i> (Pest and Disease Control) dated 11 January 2016 • AA-APM-OP-1100.20-R5 <i>Peremajaan</i> (Replanting) dated 4 March 2016 • AA-MM-508-1-RO <i>Penerimaan TBS Plasma</i> (FFB Plasma Receiving) 1 September 2015 • AA-MM-508-2-RO <i>Penentuan Taksasi TBS Plasma</i> (FFB Plasma Estimation) • AA-APM-OP-1100.8-R5 <i>Pengendalian Gulma</i> (Weed Control) • AA-FA-220-2-RO <i>Stempel</i> (Stamp) • AA-MPM-OP-1400-17-R6 <i>Ketertelusuran</i> (Traceability) dated 1 September 2017 • AA-APM-OP-1100.02-R3 <i>Penanaman Area Baru</i> (New Planting) • AA-SOP-ES-6001-R4 <i>Audit Internal Sustainability</i> (Internal Audit Sustainability) 	
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		<ul style="list-style-type: none"> • AA-KL-12-EFP <i>Restorasi Riparian dan Areal di Sekitar Danau/Waduk dan Mata Air Lainnya</i> (Restoration of Riparian Area or Near Area of Lake/Damp or Water Sources) dated 1 August 2010 • AA-HR-305.2-RO <i>Rekrutmen dan Seleksi Karyawan</i> (Recruitment and Selection of Employee). <p>Based on field visit and interview with smallholder representatives in <i>KUD Usaha Tani, Trani Maju and Mekar Abadi</i> (12 – 13 December 2019) obtain information that they can describe the procedures of upkeep (manuring, chemical weeding and pruning) and harvesting in accordance with the procedures above.</p> <p>During the field visit in smallholder plot No. 160 <i>KUD Usaha Tani</i>, plot No. 217 <i>KUD Trani Maju</i> and smallholder plot No. 249 <i>KUD Mekar Abadi</i> sighted that the ground condition (circle, harvesting path, collection point, pruning and frond stacking) are well-maintained and well-monitored according to the procedures above.</p>	
3.3.2	A mechanism to check consistent implementation of procedures is in place.	<p>To ensuring field implementation consistent with procedures, management has a mechanism such as:</p> <ul style="list-style-type: none"> • Annual Visit Agronomy (VA) and Visit Engineering (VE). Last visit in Soga Estate on 30 September to 4 October 2019 and Sei Lala Estate on 6 – 11 November 2019. • Annual Quality Control visit conducted by Quality Control Assistant. • Monthly Management Meeting. For example, there is a record of management meeting Soga Estate on 12 November 2019 that attended by group manager, estate manager, field assistant and head clerk. 	Comply

		<p>During the audit, auditor has interview QC staff for estate and mill. Through the interview obtain information as follows:</p> <ul style="list-style-type: none"> • QC in estate conducted regularly at least once a month. The items that shall verify is quality of harvesting (circle, harvesting path and FFB/loose fruit left), manuring, upkeep in immature area and replanting. Result of QC visit scale with: 0 – 159 (poor), 160 – 180 (good) and 181 – 200 (excellence). Last report on November 2019 showed that Sei Lala and Soga Estate are in 'good' status. • QC in mill conducted regularly at least once a month (minimum 4 man days). Items to check such as quality of sortation in loading ramp, sterilizer, USB check, LTDS, wet shell, fibre cyclone, temperature in clarification, kernel silo and press station, mass balance of solid and liquid and calibration of CPO/PK production in laboratory. Result of QC visit scale with: 0 – 250 (poor), 251 – 320 (good) and 321 – 400 (excellence). Last report on November 2019 showed that Ukui II POM is in 'good' status. <p>Scheme Smallholder: Based on interview with Plasma Manager as ICS Manager in coordination with board of KUD has set the monthly management meeting to discuss issues related to best management practices, social, occupational safety and health, environment and any other issues. The meeting also discussed the improvements that will be made in the future.</p>	
3.3.3	Records of monitoring and any actions taken are maintained and available.	<p>Own Estates During the audit, auditor has observe the records of following action after Visit Agronomy (VA) and Visit Engineering (VE) report. There is some action plan to follow up the findings. Some issues that captured during the visit was the pruning progress.</p>	Comply

		<p>Scheme Smallholder: Certificate holder has shown the monthly management meeting report that showed the recap of continuous improvement will be made in the future.</p>	
<p>Criteria 3.4 A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.</p>			
<p>3.4.1</p>	<p>(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/outgrower scheme, is documented.</p>	<p>Ukui II POM & Estate: The social environmental impact analysis documented in ANDAL, RKL RPL included consultation with relevant stakeholders to identify impacts and to develop any mitigation measures. PT Inti Indosawit Subur – Ukui group is able to demonstrate environmental impact assessment in AMDAL document (Studi Analisis Dampak Lingkungan/ANDAL Perkebunan Kelapa Sawit Pola PIR – Transmigrasi dan Pabrik Minyak Kelapa Sawit/PMKS di Kabupaten Kampar, Indragiri Hulu dan Bengkalis Propinsi Riau). AMDAL document has approval as per “SK Menteri Pertanian No.013/ANDAL/HA/V/95” dated 05/05/1995. In addition, environmental management and monitoring plan - RKL/RPL as per “Surat Keputusan Menteri Pertanian No.03/RKL-RPL/BA/IV/1996” dated 04/04/1996. Initial SEIA was performed by Independent consultant PT Swastika Aryindo Buana, consist of the professional and competent assessor. SEIA document was included the impacts of any smallholder/outgrower scheme.</p> <p>PT Inti Indosawit Subur – Ukui Group has increase the mill capacity in 2009, Social Environmental Impact Assessment for mill capacity increase has been conducted and presented in “Dokumen Pengelolaan dan Pemantauan Lingkungan Hidup (DPPL) Peningkatan kapasitas PMKS dan Sarana Pendukung PT Inti Indosawit Subur Kebun Ukui”. DPPL document has been approved by Riau Governor as per “Surat Keputusan Gubernur Riau No.976/X/2009 tentang Dokumen Pengelolaan dan Pemantauan Lingkungan (DPPL) untuk Peningkatan Kapasitas PMKS dan sarana pendukung PT. IIS – Kebun Ukui untuk Kebun Inti</p>	<p>Comply</p>

		<p>dan Kebun Plasma dengan Kapasitas Ukui I POM (90 ton TBS/jam) dan Ukui II (75 ton TBS/jam)", dated 28/10/2009. SEIA for mill capacity increase was performed by independent consultant PT Holistika Primagrahita, consist of the professional and competent assessor.</p> <p>Environmental Impact Assessment for Kernel Crushing Plant operation presented in "Dokumen Upaya Pengelolaan Lingkungan (UKL) dan Upaya Pemantauan Lingkungan (UPL) Kegiatan Pabrik Pengolahan Kernel Pada Pabrik PMKS Ukui - 1". UKL-UPL document has been approved by Badan Lingkungan Hidup Kabupaten pelalawan (Environmental Agency Pelalawan regency) as per "Pengesahan Badan Lingkungan Hidup Kabupaten Pelalawan No.660/BLH-AM/2012/180 tanggal 22 Februari 2012 tentang Rekomendasi atas UKL-UPL Kegiatan Pembangunan KCP di Pabrik Ukui I".</p> <p>Environmental impact assessment covered in ANDAL, RKL RPL document and environmental aspect and impact, e.g.:</p> <p><u>Pre construction:</u></p> <ul style="list-style-type: none"> - Employee recruitment <p><u>Construction:</u></p> <ul style="list-style-type: none"> - Nursery - Land clearing and planting preparation - Infrastructure and supporting facility construction and development - Land preparation - Imature Palm oil plant upkeeping - Mill location planning - Palm Oil Mill construction <p><u>Operation :</u></p> <ul style="list-style-type: none"> - Mature plantation upkeeping - Soil and water conservation - Land application (waste water application to palm oil plantation) and EFB application 	
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		<ul style="list-style-type: none"> - Harvesting and collecting FFB - FFB transportation to Palm Oil Mill - FFB Processing in Palm Oil Mill - Transportation facility providing and maintenance - CPO and PK transportation - Waste water processing - Replanting - Partnership cooperation <p>Another Social Impact Assessment has been conducted by independent consultant from "Fakultas Kehutanan Institut Pertanian Bogor" on July 2010. The SIA method was taken by participatory ways and involving the affected stakeholder at study location in 19 villages consist of 11 villages at Pelalawan Regency and 8 Villages at Indragiri Hulu Regency.</p> <p>Social Environmental impact assessment was conducted through regular environmental monitoring, e.g. river water quality, mill effluent quality, air emission, economical condition, social and culture of community and wildlife conservation.</p> <p>Social Environmental monitoring and management report reported in regular basis each semester in "Laporan Pelaksanaan Izin Lingkungan". Report semester I (Period January – June 2019) has been sent to the government on 6 September 2019 (Dinas Lingkungan Hidup Kab. Pelalawan and Dinas Lingkungan Hidup dan Kehutanan Provinsi Riau, PPE Region Sumatera and to KLH/Ministry of Environment and Forestry). Evidence of report submission can be demonstrated in "Daftar Distribusi Eksternal" and "Tanda terima Elektronik Sistem Informasi Pelaporan Elektronik Lingkungan Hidup (SIMPEL) KLHK.</p> <p>Ukui II Smallholder:</p>	
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		<p>Social Environmental Impact Assessment of Ukui Plasma has included in AMDAL document (Studi Analisis Dampak Lingkungan/ANDAL Perkebunan Kelapa Sawit Pola PIR – Transmigrasi dan Pabrik Minyak Kelapa Sawit/PMKS di Kabupaten Kampar, Indragiri Hulu dan Bengkalis Propinsi Riau).</p> <p>SEIA identified the significant potential environmental impacts deriving from operational activities such as land clearing, land development and road construction at palm oil plantations.</p> <p>Smallholder management also provide update SEIA for smallholder operation as per "Penilaian Dampak Sosial dan Lingkungan (SEIA) Kebun Plasma Ukui Tahun 2019". Smallholder manager has identified the social aspect and impact has identified such as:</p> <ul style="list-style-type: none"> - Consistency of company for villages development - Company responsibility for road maintenance - Replanting activity - Harvesting and FFB transportation : air pollution and road condition, FFB stealing, FFB quality - FFB pricing mechanism - Labor recruitment and - Land legality <p>Another Environmental aspect and impact evaluation was also conducted as per "Evaluasi Aspek – Dampak Lingkungan" EMS-431-002-LT updated on 3 January 2019.</p> <p>Involving of smallholder and stakeholder on SEIA were evident as per "Notulen Sosialisasi Rencana Kelola Sosial Terkait Aspek Permasalahan Sosial" dated 9 May 2019, participant from Local community villages representative, Cooperatives, Farmer group and Plasma Management wit number of participant 62 person.</p>	
3.4.2	For the unit of certification, a SEIA is available and social and environmental management and monitoring plans	Ukui II POM & Estate:	Comply

	<p>have been developed with participation of affected stakeholders.</p>	<p>Social Environment management and monitoring plan document were available in Environmental management plan (RPL-Rencana Pengelolaan Lingkungan) document. Document has been approved by Governor Riau as per "Surat Keputusan Gubernur Riau No.976/X/2009 tanggal 28 Oktober 2009 tentang Dokumen Pengelolaan dan Pemantauan Lingkungan. Environmental management based on document, e.g:</p> <ul style="list-style-type: none"> - Air quality and noisy management from FFB processing performed by installing the emission monitoring facility in the boiler and genset stack; installing safety in boiler stack, install the cyclone and dust trap in boiler stack, control the emission, controlling fuel efficiency, emission measurement of vehicle, boiler and generator, standard knalpot usage, reduce the vehicle speed in emplacement, road maintenance and signboard installation, OHS implementation in Palm Oil Mill. - Surface water quality and water biota management performed in order to prevent and control the physic and chemist quality of surface water comply to PP Nomor 82 tahun 2001. Performed by create terracing, land cover crop planting in open area and sloping area, organic fertilizer usage, natural predator usage for pest control, operating IPAL, land application, flat bed maintenance in land application area, housekeeping implementation and proper waste handling. - Soil quality management performed by land application management according to KepMen LH No. 28 Tahun 2003, groundwater quality check, flat bed maintenance, vegetation planting around waste water pond and maintenance of waste water pond, domestic and hazardous waste management. - Erosion and sedimentation management performed by creating and maintenance the individual terrace (tapak kuda) in area with slope 3 – 15% and maintain the land cover crop (Leguminosae), frond stacking and EFB application. - Flora fauna management performed by signboard installation regarding prohibition of plant destruction in conservation area, vegetation 	
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		<p>enrichment in conservation area, wildlife protection and maintain the conservation area.</p> <ul style="list-style-type: none"> - Community perception management performed in order to prevent and control the negative perception and potential conflict from community against employee recruitment process. Company has conducted workers recruitment transparently, each vacancy were publish to surrounding village, FFB purchasing from local plantation surrounding company, coaching and conseling to plasma member, CSR programme implementation. <p>During field observation and document verification at Ukui II POM, Soga Estate and Sei Lala Estate, it can be demonstrated that all the environmental management plan has been implemented as per document RKL-RPL. The evaluation of social environmental management plan effectivity has been carried out and presented in RKL-RPL report semester I (January – June) 2019.</p> <p>Scheme Smallholder:</p> <p>Ukui Smallholder has develop the social environment management and monitoring plan as per "Rencana Kelola Sosial Terkait Aspek Permasalahan Sosial Kebun Plasma Ukui", covering:</p> <ul style="list-style-type: none"> - Villages development, PT IIS – Ukui Group as a facilitator of Ukui Smallholder has responsibility to villages development by implementing CSR program. - Road condition, company has responsibility for road maintenance due to FFB transportation activity; Company provide the assistance of heavy equipment (grader, compactor, bacholader) for road maintenance. - Replanting activity, company propose the replanting plan program for smallholder plantation and socialize to smallholder member. - FFB harvesting, company give the training to improve FFB quality from smallholder plantation, strict sanction to FFB stealing. 	
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		<ul style="list-style-type: none"> - Air pollution by FFB transportation, company has a program for road maintenance minimum once a year. - FFB pricing mechanism, company informed the FFB price regularly according to pricing determination by Disbun Provinsi Riau. <p>Ukui Smallholder Manager has developed mitigation plan to reduce environmental risks, presented in "Progress Perbaikan Lingkungan Kebun Plasma Ukui". Mitigation plan develop by Group Manager such as:</p> <ul style="list-style-type: none"> - Optimize FFB transportation, by one way and not returning to the kavling/block to reduce the fossil fuel usage - TPH arrangement along the side collection road to become one way to ease the FFB transportation - Performing the proper fertilizing and appropriately to reduce the water pollution, prohibit to fertilizing in riparian area (3 m from left and right side) - Use the appropriate PPE to reduce the impact of spraying activity and cooperate with TUS team PT Inti Indosawit to handling the chemical weeding in Plasma Ukui. - Proper application of fertilizer dan pesticide according to recommendation and handle by trained person. - Minimize the electrical usage to reduce the fosil fuel and air pollution. <p>During site visit and interview with smallholder member in KUD Trani Maju, KUD Usaha Tani and KUD Mekar Abadi, they have implementing the environmental impacts and contribute to reduce the environmental impact. For example, the ex fertilizer sack must be handled by triple rinse and use as loosefruit sack; the innerbag was delivered to collector; they aware about prohibition chemical activity near to the river and prohibition of animal hunting in the plantation area.</p>	
3.4.3	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p>	<p>Ukui II POM & Estate:</p> <p>Social Environment management and monitoring plan as per RKL – RPL document has been implemented by PT Rigunas Agri Utama. The evidence</p>	Comply

		<p>of RKL – RPL implementation are evident in “Laporan Pelaksanaan Izin Lingkungan”. Based on verification on Environmental management and monitoring report, confirmed that the management and monitoring plan has been well implemented accordingly. Data verified during audit :</p> <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. Air emission quality in Ukui I POM analyze by Sucofindo Testing Laboratory. Boiler emission, Biogas Engine emission and Genset emission test conducted on 18 July 2019. Report of sampling and analysis Certificate No. 26618, 26624, 26625, 26626, 26627, 26628, 26629, 26630/DBBPAM dated 7 August 2019; Analysis air emission of: Boiler 01, 02, 03, Genset 01 dan 02. According to report analysis of air emission can be demonstrated that all parameter analyzed was met with the standard and comply with Environmental Minister Decree No. PerMenLH No. 21/2008 Attachment IVA, Environmental Minister Decree No. Kep-07/MENLH/2007 Attachment I. Air ambient quality also tested by Sucofindo, Certificate of Analysis No. 01649/ALAIAM shown that the result of analysis was comply with Government Regulation No. 41/1999. - Surface water quality and water biota monitoring to prevent and control the physic and chemist quality of surface water comply to PP Nomor 82 tahun 2001. Perfomed by waste water quality monitoring each month, hazardous waste monitoring, land application monitoring, surface water quality monitoring each semester. Waste water quality monitoring analyze by UPT Laboratorium Bahan Konstruksi Dinas PU & Penataan Ruang Prov. Riau. Waste water analysis result since January – September 2019 shown comply with regulation Peraturan Gubernur Riau No. 35 Tahun 2007 & KepMENLH No. 28 tahun 2003. Surface water quality test (Sungai Pematang River and Air hitam river upstream and downstream) by Sucofindo on 17 May 2019 shown the result “Report of Analysis No. 	
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		<p>01670/ALAIAM" is comply with Government Regulation of Republic Indonesia No. 82/2001.</p> <ul style="list-style-type: none"> - Soil quality monitoring performed by soil sampling analysis in "rorak, antar rorak and lahan control", EFB application monitoring, groundwater analysis each year. Latest soil analysis conducted on 16 May 2019 by "Laboratorium Pengujian Kualitas Lingkungan Pro – Enviro Medan", Report of analysis No. 118-10/T/ENVIRO/VI/2019. Groundwater analysis conducted on 6th May 2019 in Well control of land application (LA) and non LA by UPT Laboratorium Bahan Konstruksi Dinas PU & Penataan Ruang Prov. Riau. Report of Analysis No. MT.1/01.03.06.79.172 and MT.1/01.03.06.79.173 shown comply with regulation PerMenKes No. 416/MENKES/Per/IX/1990. - Erossion and sedimentation monitoring performed by erosion measurement according to USLE method. Measurement result since January – June 2019 shown erosion level average under 15 ton/ha/year for Soga and Sei Lala Estate categorized as very good criteria. - Flora fauna monitoring perfomed by wildlife monitoring and monitoring the conservation area each month. Monitoring Since January - June 2019 at Soga Estate and Sei Lala Estate shown that there were 7 species of mammal presence (<i>Macaca fascicularis</i>, <i>Macaca nemestrina</i>, <i>Calosciurus notatus</i>, <i>Sus crofa</i>, <i>Rattus sp</i>, <i>Felis bengalensis</i>, <i>Paradoxurus sp</i>), 13 species of birds (such as: <i>Halcyon smyrnensis</i>, <i>Rhipidura javanica</i>, <i>Centropus bengalensis</i>, <i>Pycnonotus aurigaster</i>), 4 species of reptile (<i>Varanus salvator</i>, <i>fejevarya sp</i>, <i>Mabouya sp</i>, <i>Denrelaphis caudolineatus</i>). - Community perception monitoring performed by community interview, employee data monitoring, interview with village head or public figure regarding their perception to company. Company has monitored the public perception through questioner each year. Questiner to public perception regarding the impact of company presence has been disseminated to surrounding community. Latest monitoring of public perception has been performed in 2018, questioner of public perception can be demonstrated and well documented in RKL-RPL report semester II 2018. Generally public 	
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		<p>perception was positive regarding the company presence and contribution to the surrounding community.</p> <p>All management and monitoring plan has been implemented well by company according to RKL-RPL document. The implementation report has been reviewed and reported to government agency per semester (six monthly).</p> <p>During field observation and document verification, it can be demonstrated that all the environmental monitoring plan has been implemented as per document RKL-RPL. The evaluation of environmental monitoring plan effectivity has been carried out and presented in RKL-RPL report semester I 2019. Evaluation consist of:</p> <ul style="list-style-type: none"> - Trend evaluation of air ambient quality, air emission, odor, ground water quality, wate water quality, surface water quality, soil erosion shown that the result of monitoring are all parameter is met with the standard of regulation. Trend evaluation of water usage still under the budget/standard; biodiversity trend evaluation shown that there were still found the presence of animal including protected animal; Social economic trend evaluation shown increasing each year. Overall the trend evaluation shown the consistency and increasing in environmental performance. - Critical evaluation, the critical point in environmental monitoring is waste water quality and surface water usage. Based on the result of monitoring shown that waste water quality since January – June 2019 was met with regulation (BOD < 5,000 mg/l and pH 6 – 9). Surface water usage trend is increasing due to increasing of FFB processed. - Compliance evaluation to regulation. According to evaluation of impact against soil erosion, water quality, soil quality, air quality, biodiversity, surrounding social and economic, health and safety, indicated that PT Inti Indosawit Subur – Ukui II POM has comply with all relevant regulation. Public perception monitoring for 2018 has been carried out and there is no negative perception occured. 	
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		<p>Scheme Smallholder:</p> <p>Smallholder management has develop the social and environment management and monitoring plan. The plan realization was reviewed each quarter through participatory ways and involving the stakeholder.</p> <ul style="list-style-type: none"> - Implementing the CSR programme such as: road infrastructure assistance, religious facility assistance and clean water provision - Socialization and assistance of replanting porogramme - BMP Coaching and training to smallholder to improve FFB quality - Harvesting training and PPE provision <p>The realization of management and monitoring plan above can be demonstrated during audit. Review to management and monitoring plan was performed at the end of year (once a year).</p> <p>Smallholder management monitor the usage of ex fertilizer sack in KUD each month. The monitoring record were evident in "Monitoring Penggunaan Bekas Karung Pupuk untuk Tempat Brondolan" period January – October 2019. Sample seen for KUD Trani Maju, KUD Usaha Tani and KUD Mekar Abadi.</p> <p>Smallholder management also monitor the implementation of mitigation plan to reduce the environmental impact such as: ensure the TUS team not performing spraying work near to the river (3 m from left and right side), ensure there is no illegal hunting in plantation area of Plasma Ukui.</p>	
<p>Criteria 3.5 A system for managing human resources is in place.</p>			
<p>3.5.1</p>	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives.</p>	<p>The company has procedure no. SOP AA-HR-305.2-RO (Rekrutmen dan Seleksi Karyawan) which regulated that hiring and promotion of workers are based on skill, work experiences, and job evaluation.</p> <p>Promotion and upgrade are based on employee appraisal conducted annually as outlined in the Employee Assessment Form signed by the employee</p>	<p>Comply</p>

		<p>concerned, approved by the line manager and checked by the General Manager. For example:</p> <ul style="list-style-type: none"> - Promotion form temporary to permanent workers, based on Memorandum No. 005/HR-RO2/MEMO/SK/02/2019, dated 15 Januari 2019, on behalf of Mr. Yusrizal Sagita as Tukang Babat. - Promotion form temporary to permanent workers, based on Memorandum No. 004/HR-RO2/MEMO/SK/02/2019, dated 15 Januari 2019, on behalf of Mr. Antonius H.J.B Lubis as Sampel Boy. <p>Ukui Smallholder:</p> <p>Ukui smallholder has had procedure of recruitment in form "Mekanisme Penerimaan Karyawan" dated 20 January 2017. The procedure describes the process and requirement for recruitment is based on skill, work experiences, and job evaluation.</p>	
3.5.2	Employment procedures are implemented and records are maintained.	The Procedure no. SOP AA-HR-305.2-RO (Rekrutmen dan Seleksi Karyawan) and procedure Mekanisme Penerimaan Karyawan at Plasma are based on skill, work experiences, and job evaluation. The form indicates that there is no indication of employment discrimination in terms of ethnicity, caste, religion, disability, gender, sexual orientation, union membership, political affiliation and/or age.	Comply
Criteria 3.6 An Occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.	<p>UKUI-2 POM:</p> <p>HIRADC for Ukui 2 POM have been prepared, last review and update 7 January 2019 covering all activities and location for mill scope: office, mill road area, security pos, parking area, all station mill, laboratory, POME instalation/IPAL.</p> <p>Mitigation plan to reduce and minimize the risk impact has been develop by company covering:</p>	Comply

		<ul style="list-style-type: none"> - Elimination of risk - Substitution of material and process - Engineering control - Administratif control - Personal protective equipment. <p>Engineering control was implemented to prevent hearing loss, e.g. install noise reduction agent and administrative by erected signboard of noise area, as described in Risk.</p> <p>Administratif control was performed by employee mutation/rotation, sanction for safety rules violation. Safety inspection was performed regularly to ensure the compliance of safety regulation.</p> <p>PPE Provision for all workers at mill are demonstrated as per "Bukti Serah Terima Alat Pelindung Diri Pabrik Ukui II". Sample seen:</p> <ul style="list-style-type: none"> - Bukti Serah Terima APD Safety Shoes for workshop operator as much as 21 unit, dated 6 May 2019 and 27 October 2019. - Bukti Serah Terima APD safety shoes for Mill process workers on dated 27 October 2019 as much as 54 unit. <p>Safety shoes was provide twice a year for all process operator including mechanic. During interview with operator Ukui II POM confirmed that they receive safety shoes twice a year. Monitoring of PPE usage can be demonstrated on document "Monitoring penggunaan APD" period November 2019 for each station.</p> <p>SOGA ESTATE and SEI LALA ESTATE:</p> <p>Soga Estate and Sei Lala Estate has prepared HIRADC 2019 as per "Dokumen Hazard Identification Risk Assessment and Control Tahun 2019" Kebun Soga and Kebun Sei Lala. Latest review of HIRADC document was done on 6 August 2019. Hazard and risk edentification and assessment are covering all activity at Soga Estate and Sei Lala Estate such as: Office, Housing, Material storage</p>	
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		<p>(fertilizer, fuel, agrochemical, sparepart, building material, etc), upkeeping (manual upkeeping and chemical upkeeping), harvesting, FFB transportation, hazardous and donmestic waste handling, road maintenance, vehicle maintenance (traksi), etc. The risk analysis and assessment has been performed according to procedure.</p> <p>Mitigation plan to reduce and minimize the risk impact has been develop by company covering:</p> <ul style="list-style-type: none"> - Elimination of risk - Subtitution of material and process - Engineering control - Administratif control - Personal protective equipment. <p>Sample seen for spraying workers, the risk impact probability was irritate and eyes diease, control by using appropriate PPE (eye wear/safety glasses, masker and handgloves) and regular training for sprayer workers.</p> <p>Scheme Smallholder:</p> <p>Smallholder manager has prepared hazard identification and risk assessment as per "Dokumen Hazard Identification Risk Assessment and Control (HIRAC)". Risk assessment has calculation of impact value, consequences value, possibility value. All activity, all area have been evaluated. Latest update of risk assessment was January 2019, including all activity of smallholder plantation. Mitigation plan to eliminate or reduce the hazard and risk has been develop according to HIRAC as per "Alternatif Kontrol Resiko untuk Tindakan Perbaikan".</p> <p>An OHS plan prepared as per "Rencana K3 (Keselamatan dan Kesehatan Kerja) majority to provide and control use of PPE, including socialization and monitoring.</p>	
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<p>3.6.2</p>	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.</p>	<p>Ukui II POM & Estate:</p> <p>Health and safety plan available under "Program Management K3 Kebun Soga Tahun 2019" prepared March 2018:</p> <ul style="list-style-type: none"> - OSH Inspection: Activity: PPE use inspection; Purpose: to reduce work related injury (zero accident); Program: Provision and standardization of safety shoes, mask, earplug, ear muff, goggle, etc.; Priority: High; Timeline: July & December; - Health Program: Activity: Medical Check Up; Purpose: To understand employee's health status; Program: Medical check up twice per annum; Priority: Mid; Timeline: January & October; <p>PPE provision for workers were evident including all workers at estate and Mill.</p> <p>PPE use monitoring as per "Daftar Cek List APD Karyawan Panen A, B, C" for harvesters period January – November 2019. Check for use of helmet, gum boot, sickle cover.</p> <p>PPE use monitoring as per "Daftar Cek List APD Karyawan" for sprayers period January – November 2019 at Soga and Sei Lala Estate.</p> <p>Safety inspection to ensure the compliance of safety regulation were done by OHS expert at Ukui II POM and Soga Estate/Sei Lala Estate.</p> <p>Non conformity raised during audit:</p> <p>During field visit at Loading Ramp station Ukui II POM, found that driver and FFB loader were not use appropriate PPE. While the safety regulation at Ukui II POM, all workers shall be use appropriate PPE at Mill area.</p> <p>During site tour at Soga Estate and Sei Lala Estate found unsafe act by FFB loader who is seatdown at the top of truck cabin.</p>	<p>Major nonconformance</p>
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		<p>During field visit at Ukui II POM, found that 4 fire hose at 5 Hydrant box are not properly function, while the checklist inspection stated that all Hydrant equipment were in good condition.</p> <p>Scheme smallholder: Plasma Ukui Group has prepare the OHS plan, including:</p> <ul style="list-style-type: none"> - PPE usage socialization, evidence of implementation available in "Notulen Penyuluhan Panen Kebun Plasma Ukui" dated 10 October 2019. - Monitoring of PPE usage - Free medical checkup for surrounding community near Plasma plantation - Extra fooding for Balita <p>Evidence of OHS plan monitoring: PPE monitoring as per "Monitoring Alat PElindung Diri Pekerjaan Panen" KUD Usaha Tani, KUD Trani Maju, KUD Mekar Abadi. PPE monitoring including: safety helmet, boots, handgloves, safety glasses, Egrek cover. Monitoring conducted each month by field foreman.</p>									
<p>Criteria 3.7 All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.</p>											
<p>3.7.1</p>	<p>(C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and outgrowers, taking into account gender-specific needs, and which covers applicable aspects of the RSPO P&C, in a form they understand, and which includes assessments of training.</p>	<p>The company was able to demonstrate "Kalender Pelatihan Tahun 2019". It is a program for training of environment and sustainability in Asian Agri Learning Institute.</p> <table border="1" data-bbox="1003 1225 1843 1310"> <thead> <tr> <th data-bbox="1003 1225 1236 1310">Training Subject</th> <th data-bbox="1236 1225 1523 1310">Operation Unit</th> <th data-bbox="1523 1225 1680 1310">Attendanc e</th> <th data-bbox="1680 1225 1843 1310">Schedule</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Training Subject	Operation Unit	Attendanc e	Schedule					<p>Comply</p>
Training Subject	Operation Unit	Attendanc e	Schedule								

RSPO Public Summary Report
Revision 9 (Nov 2019)

Sustainability Awareness	Ukui Estate, Plasma Ukui, Ukui I & II POM, Soga Estate	Staff and Non Staff	12 Mar 2019															
	Traceability and Mass Balance	Ukui I & II POM	Staff and Non Staff	8-9 Nov 2019														
	HCV Awareness	Ukui Estate, Plasma Ukui, Ukui I & II POM, Soga Estate	Staff and Non Staff	14 Mar 2019														
	Basic Fire	Ukui Estate, Plasma Ukui, Ukui I & II POM, Soga Estate	Staff and Non Staff	14 Mar 2019														
	First Aider	Ukui Estate, Plasma Ukui, Ukui I & II POM, Soga Estate	Staff and Non Staff	13 Aug 2019														
<p>Scheme Smallholder: Plasma Ukui has established Training Program for KUD, KT and farmer member for year 2019. Training consist of:</p> <table border="1"> <thead> <tr> <th>Subject</th> <th>Plan</th> <th>Realisation</th> <th>Planned attendance</th> <th>Actual attendance</th> </tr> </thead> <tbody> <tr> <td>RSPO P&C for Group Certification</td> <td>03/08/2019</td> <td>03/08/2019</td> <td>80</td> <td>55</td> </tr> <tr> <td>PPE (Basic Safety)</td> <td>20/04/2019</td> <td>20/04/2019</td> <td>40</td> <td>62</td> </tr> </tbody> </table>				Subject	Plan	Realisation	Planned attendance	Actual attendance	RSPO P&C for Group Certification	03/08/2019	03/08/2019	80	55	PPE (Basic Safety)	20/04/2019	20/04/2019	40	62
Subject	Plan	Realisation	Planned attendance	Actual attendance														
RSPO P&C for Group Certification	03/08/2019	03/08/2019	80	55														
PPE (Basic Safety)	20/04/2019	20/04/2019	40	62														

		<table border="1"> <tr> <td>HCV, EIA and Soil and water conservation</td> <td>19/10/2019</td> <td>19/10/2019</td> <td>50</td> <td>50</td> </tr> <tr> <td>OHS (Basic Safety)</td> <td>20/04/2019</td> <td>20/04/2019</td> <td>40</td> <td>62</td> </tr> <tr> <td>First Aid</td> <td>20/04/2019</td> <td>20/04/2019</td> <td>40</td> <td>62</td> </tr> <tr> <td>Basic Fire</td> <td>24/10/2019</td> <td>24/10/2019</td> <td>114</td> <td>114</td> </tr> <tr> <td>Limited pesticide application</td> <td>24/05/2019</td> <td>24/05/2019</td> <td>124</td> <td>124</td> </tr> <tr> <td>Weed control</td> <td>03/08/2019</td> <td>03/08/2019</td> <td>70</td> <td>70</td> </tr> <tr> <td>Fertilizer application</td> <td>03/08/2019</td> <td>03/08/2019</td> <td>70</td> <td>70</td> </tr> <tr> <td>Integrated pest management</td> <td>20/07/2019</td> <td>03/08/2019</td> <td>70</td> <td>70</td> </tr> <tr> <td>Harvesting</td> <td>09/02/2019</td> <td>06/03/2019</td> <td>60</td> <td>69</td> </tr> </table>	HCV, EIA and Soil and water conservation	19/10/2019	19/10/2019	50	50	OHS (Basic Safety)	20/04/2019	20/04/2019	40	62	First Aid	20/04/2019	20/04/2019	40	62	Basic Fire	24/10/2019	24/10/2019	114	114	Limited pesticide application	24/05/2019	24/05/2019	124	124	Weed control	03/08/2019	03/08/2019	70	70	Fertilizer application	03/08/2019	03/08/2019	70	70	Integrated pest management	20/07/2019	03/08/2019	70	70	Harvesting	09/02/2019	06/03/2019	60	69	
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Integrated pest management	20/07/2019	03/08/2019	70	70																																												
Harvesting	09/02/2019	06/03/2019	60	69																																												
3.7.2	Records of training are maintained, where appropriate on an individual basis.	<p>Record of training are available, such as training attendant list, as sample described below:</p> <ul style="list-style-type: none"> - Training attendance list dated 31/03/2017, regarding use of spraying tools, attended by 38 spraying workers of Soga Estate, Sei Lala Estate and Ukui Estate. 	Comply																																													

		<ul style="list-style-type: none"> - Training attendance list dated 11/09/2019, regarding basic fire, attended by 26 workers of Ukui I POM, Ukui II POM, Soga Estate, Sei Lala Estate and Ukui Estate. - Training attendance list dated 22/10/2019, regarding refreshment of integrated pest management, attended by 16 workers of Soga Estate, Sei Lala Estate and Ukui Estate. - Training attendance list dated 24/05/2019, regarding limited pesticide application, attended by 31 workers of Ukui Plasma; 25 workers of Ukui; 21 workers of Sei Lala Estate; 15 workers of Soga Estate. <p>Personal Data Training of staff, workers and Scheme Smallholders are available, e.g.:</p> <ul style="list-style-type: none"> - Mespandi, spraying worker of Soga Estate, has attend training of pesticide handling on 14/03/2018; use of spraying tools on 31/03/2017. - Anisa, personnel staff of Sei Lala Estate, has attend training of OHS on 29/11/2019; sustainability awareness on 21/08/2019. - Ishak Purba, upkeep mandor of Sei Lala Estate, has attend training of OHS on 29/11/2019; sustainability awareness on 21/08/2019. - Riskan Daudi, KTU of Sei Lala Estate, has attend training of Environment aspect impact evaluation on 18/11/2019; basic fire on 11/09/2019; OHS on 29/11/2019; sustainability awareness on 21/08/2019. - Yismaya Ray Veranda, Field Assistant of Sei Lala Estate, has attend training of refreshment integrated pest management on 30/10/2019; OHS on 29/11/2019; sustainability awareness on 21/08/2019. - Lamijo, Mandor Plasma Ukui SP 1A, has attend training of RSPO P&C for Group Certification on 03/08/2019; PPE (Basic Safety) on 20/04/2019; HCV, EIA and Soil and Water Conservation on 19/10/2019; OHS on 20/04/2019; First Aid on 20/04/2019; Basic Fire on 26/10/2019; limited pesticides on 24/05/2019; weed control on 03/08/2019; fertilizer 	
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		<p>application on 03/08/2019; integrated pest management on 03/08/2019; harvesting on 06/03/2019.</p> <ul style="list-style-type: none"> - Muhamad Yusuf Nasution, Mandor Plasma Ukui II, has attend training of RSPO P&C for Group Certification on 03/08/2019; PPE (Basic Safety) on 20/04/2019; HCV, EIA and Soil and Water Conservation on 19/10/2019; OHS on 20/04/2019; First Aid on 20/04/2019; Basic Fire on 26/10/2019; limited pesticides on 24/05/2019; weed control on 03/08/2019; fertilizer application on 03/08/2019; integrated pest management on 03/08/2019; harvesting on 06/03/2019. - Bambang Efendi, Laboratory Head of Ukui II POM, has attend training of First Aid on 22/05/2019; Basic Fire on 19-21/07/2019; Laboratory Analysis on 3-4/08/2019. - M. Ricky Ardianto, Assistant Process of Ukui II POM, has attend training Self Development on 6-7/03/2019. 	
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>	<ul style="list-style-type: none"> - Aston Sirait, Production Clerk of Ukui II POM, has attend training of Supply Chain: Traceability and Mass Balance on 08/11/2019; Sustainability Awareness on 12/03/2019. - Boyke Silitonga, Production Clerk of Ukui II POM, has attend training of Supply Chain: Traceability and Mass Balance on 08/11/2019; Sustainability Awareness on 12/03/2019. - Nuraini Tambunan, Production Clerk of Ukui II POM, has attend training of Supply Chain: Sustainability Awareness on 12/03/2019. 	Comply

Supply chain requirements for mills.

Procedural note:

The below numbering is as per the current RSPO SCCS standard and will be renumbered to become 3.8 and onwards following the revision of the RSPO SCCS in 2019. 'D' therefore refers to RSPO SCCS 'Module D – Crude Palm Oil (CPO) mills: Identity Preserved' and 'E' to RSPO SCCS 'Module E – CPO mills: Mass Balance'. Depending on the supply chain model chosen, the corresponding requirements apply as well as all general requirements (those with numbers only).

The RSPO SCCS document uses the terms 'site' and 'organisation' to refer to the unit of certification.

Definition			
<p>Identity Preserved Mill D.1</p>	<p>A mill is deemed to be Identity Preserved (IP) if the FFB used by the mill are sourced from plantation/ estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.</p> <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Module E is applicable.</p>	<p>PT Inti Indosawit Subur – Ukui II POM has defined RSPO Supply Chain model Identity Preserved (Module D – CPO Mill: Identity Preserved). With the implementation of Module D – CPO Mills: Identity Preserved, PT Inti Indosawit Subur - Ukui II POM does not received FFB from third-party or non-certified FFB supplier.</p> <p>PT Inti Indosawit Subur - Ukui II Palm Oil Mill currently hold a valid RSPO P&C certificate, as certificate number RSPO 565807, valid until 28th February 2021, with supply chain model is Identity Preserved.</p> <p>All FFB are received from certified supply bases, which are from:</p> <ul style="list-style-type: none"> – Company-owned estates, e.g: Soga Estate and Sei Lala Estate; – Scheme Smallholders, consist of 6 (six) Smallholder cooperatives, e.g.: KUD Tani Subur, KUD Karya Tani, KUD Mekar Abadi, KUD Trani Maju, KUD Tani Bahagia and KUD Usaha Tani. 	<p>Comply</p>
<p>Mass Balance Mill E.1</p>	<p>Certification for CPO mills is necessary to verify the volumes of certified and uncertified FFB entering the mill and sales volume of RSPO certified products. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	<p>PT Inti Indosawit Subur – Ukui II POM implements RSPO Supply Chain model Identity Preserved (Module D – CPO Mill: Identity Preserved).</p> <p>Not applicable.</p>	<p>Comply</p>
Explanation (Volume and product integrity)			
<p>D.2 E.2</p>	<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. For an</p>	<p>The estimated tonnage of CPO and PK products that could potentially produced by PT Inti Indosawit Subur – Ukui II POM has been recorded in BSI's public summary report.</p>	<p>Comply</p>

	<p>independent mill, the estimated tonnage of CPO and PK products shall be recorded in the RSPO IT platform, supply chain certificate and public summary audit 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 mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organisation (RSPO IT platform).</p>	<p>The estimated tonnage of certified CPO and PK are available in the Ukui II POM annual production budget for 2020 and in Management Plan 2019 – 2024.</p> <p>All FFB are received from certified supply bases, which are from:</p> <ul style="list-style-type: none"> - Company-owned estates, e.g: Soga Estate and Sei Lala Estate; - Scheme Smallholders, consist of 6 (six) Smallholder cooperatives, e.g.: KUD Tani Subur, KUD Karya Tani, KUD Mekar Abadi, KUD Trani Maju, KUD Tani Bahagia and KUD Usaha Tani. 	
5.3 Documented procedures			
<p>5.3.1 D.3 E.3</p>	<p>The site shall have written procedures and/or work instructions 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"> • Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. • Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). • Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the organisation's 	<p>PT Inti Indosawit Subur - Ukui II POM demonstrates Standard Operating Procedures which complete and up to date covering the implementation of all the elements in RSPO Supply Chain requirements, e.g.:</p> <p>PT Inti Indosawit Subur – UKUI II POM can demonstrate procedures, such as:</p> <ol style="list-style-type: none"> 1. Traceability AA-MPM-OP-1400.17.R7 with latest revision dated 1 Oct 2019. The procedures cover traceability of palm products (CPO and PK) since receiving of fresh fruit bunches from Soga Estate, Sei Lala Estate and 6 scheme smallholder cooperatives, processing of up to shipping of CPO and PK as well as Daily production report Ukui II POM. The procedure also regulates the internal audit by environmental and sustainability head. Traceability records are to be kept for 10 years. The SOP Traceability covers responsibility for implementation of RSPO Supply Chain Module D: CPO Mills Identity Preserved, such as: <ul style="list-style-type: none"> - Weighbridge operator responsible to input data on FFB receiving and delivery of CPO and PK. 	<p>Comply</p>

	<p>procedures for the implementation of this standard.</p> <ul style="list-style-type: none"> The site shall have documented procedures for receiving and processing certified and non-certified FFBs. 	<ul style="list-style-type: none"> - Production supervisor prepared data for daily monitoring for: certified FFB received; FFB processed; production of certified CPO and PK; oil extraction rate for certified CPO and PK; delivery of certified CPO and PK; initial stock and ending stock of certified CPO and PK; - Administration officer creates certified CPO and PK daily delivery recapitulation, per delivery order proposed by Marketing Manager. - Mill manager signed the daily production report after verification. - Production supervisor and administration officer prepares the daily production report. - Marketing Manager creates delivery order with clear identity. - Sustainability Internal Audit Manager conducts the internal audit, to ensure operational activity on the field and data documentation on the field are implemented; minimum once per year. <p>2. Standard Operating Procedure – Book Keeping (AA-MPM-OP-1400.18-R4) revision dated 25 February 2015. The procedure explains job and responsibility of Production clerk, KTU and Mill Manager in making “book keeping” documentation. Head of Environmental and Sustainability will inform to certification body if there is case of projected overproduction.</p> <p>3. Standard Operating Procedure – RSPO PalmTrace System (AA-SM-405.2-R3) dated 1 Jan 2018. The procedure described job and responsibility of Trader, Logistic, Shipment and PPIC on carried out process of transaction input in RSPO PalmTrace system.</p> <p>PT Inti Indosawit Subur – UKUI II 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 (see indicator 3.7.3).</p> <p>As per Procedure of Traceability (AA-MPM-OP-1400.17-R7) Chapter 5.7 mentioned that the Mill Manager ensure all operation and administration activities are comply to the sustainability and RSPO Supply Chain requirements.</p>	
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		During audit, PIC is able to demonstrate sufficient knowledge and understanding on RSPO supply chain implementation for palm oil mill.	
5.3.2 Internal Audit			
5.3.2	<p>The site shall have a written procedure to conduct annual internal audit to determine whether the organisation;</p> <ul style="list-style-type: none"> • Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. • Effectively implements and maintains the standard requirements within its organisation. <p>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 organisation shall be able to maintain the internal audit records and reports.</p>	<p>As per Procedure of Traceability (AA-MPM-OP-1400.17-R6) chapter 5.7, Sustainability Internal Audit Manager conducted internal audit to ensure implementation and administration are comply to the requirement in RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. Internal audit shall be conducted 2 (two) times in a year at minimum. In 2019 internal audit conducted on 8 January 2019 and 24 October 2019.</p> <p>Major Non Conformity: Result of internal audit that conducted on 24 Oct 2019 is not effective to ensures implementation and maintaining the standard requirements within organisation.</p>	Major nonconformance
5.4 Purchasing Goods In			
D.4.1/ D.4.2 E.4.1/E.4.2	<p>The site shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.</p>	<p>The Mill use supply chain model Identity Preserved, therefore the mill not received and processed non-certified FFB.</p> <p>Procedure of Traceability (AA-MPM-OP-1400.17.R7) with latest revision dated 1 Oct 2019 described that KTU who verify and documented tonnage and source of certified FFB in "Laporan Harian Pabrik", then Mill Manager who verify and approve it.</p>	Comply

RSPO Public Summary Report
Revision 9 (Nov 2019)

		<p>Data verified:</p> <ul style="list-style-type: none"> - Daily Production Report Ukui II POM: "Laporan Harian Pabrik" dated 30 Nov 2019; described FFB received from Soga Estate and Sei Lala Estate on the day is 447.96 MT; todate is 12,270.85 MT; to the Month November is 133,775.63 MT; from Scheme Smallholder (Plasm Ukui) on the day is 45.75 MT; todate is 10,298.30 MT; to the Month November is 128,214.92 MT; total on the day is 493.71 MT; todate is 22,569.15 MT; to the Month November is 261,990.55 MT. - Weighbridge card No.PUDA119117232 dated 30/11/2019; commodity is FFB certified; source is Sei Lala Estate Div 3 Block C90a; amount 266 bunches; nett weight is 6,870 kg; Certificate No. RSPO 565807; DN #KSLDT0220190930170804; transporter internal BM 8341 TC; driver Ekawan Putra; batch No.13-100-16462019-10082524. - Weighbridge card No.PUDA119119555 dated 31/10/2019; commodity is FFB certified; source is Soga Estate Div 3 Block C98b; amount 302 bunches; nett weight is 8,190 kg; Certificate No. RSPO 565807; DN #007390; transporter internal BM 9183 FC; driver Amir Yadah; batch No.13-100-16462019-10092539. - Record of FFB received from KUD Karya Tani: "Surat Pengantar TBS" No.30/Plasma dated 18/09/2019; amount 249 bunches FFB Certified; source is KUD Karya Tani, No KT 268 (Tani Makmur), YOP 1990/1991; Vehicle number BM 8985 BA. Followed up by weighbridge card No.PUDA219112363, dated 18/09/2019; commodity is FFB certified; source is Kebun Plasma (Scheme Smallholders) KT 268 (Tani Makmur) Block K2268; amount 249 bunches; nett weight is 6,347 kg; Certificate No. RSPO 565807; DN #30/Plasma; transporter by plasma, BM 8985 BA; driver Rio; batch No.13-100-24282019-10079002. - Record of FFB received from KUD Trani Maju: "Surat Pengantar TBS" No.02/Plasma dated 28/11/2019; amount 376 bunches FFB Certified; source is KUD Trani Maju, No KT 286 (Kuncup Mekar), YOP 1990/1991; Vehicle number BM 9795 BA. Followed up by weighbridge card 	
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		<p>No.PUDA219115432, dated 28/11/2019; commodity is FFB certified; source is Kebun Plasma (Scheme Smallholders) KT 286 (Kuncup Mekar) Block K4286; amount 376 bunches; nett weight is 8,453 kg; Certificate No. RSPO 565807; DN #02/Plasma; transporter by plasma, BM 9795 BA; driver Yanto; batch No.13-100-24282019-10100322.</p> <p>Based on interview with weighbridge clerk, mill only received FFB from certified source, which are Soga Estate, Sei Lala Estate and 6 KUD of Ukui Plasma (KUD Tani Subur, KUD Karya Tani, KUD Mekar Abadi, KUD Trani Maju, KUD Tani Bahagia and KUD Usaha Tani). There is no FFB coming from outside or third-party supplier.</p> <p>Standard Operating Procedure – Book Keeping (AA-MPM-OP-1400.18-R4) revision dated 25 February 2015, Chapter 6.5, page 6, mentioned mechanism that Head of Environmental and Sustainability will inform to certification body if there is case of projected overproduction.</p>	
<p>5.5 Outsourcing Activities</p>			
<p>5.5.1</p>	<p>In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the operation seeking or holding certification shall ensure that the independent third party complies with the requirements of the RSPO Supply Chain Certification Standard. A CPO mill and independent mill cannot outsource processing activities like refining or crushing.</p> <p>This requirement is not applicable to outsourced storage facilities where the management of the oil palm product(s)</p>	<p>The transport for RSPO certified sustainable CPO and PK delivery were carried out by numbers of transporter, e.g.:</p> <p>CPO:</p> <ul style="list-style-type: none"> CV Jasa Sahabat Abadi. Contract based on "Perjanjian Pengangkutan" No.08/X/JSA-IIS/2019 dated 1 Oct 2019. Address: Jl. Besar Kisaran, Desa Sidomulyo, Kecamatan Pulo Bandring, Medan. Represented by Mr. Darmin Tanudjaja. This contractor was appointed, contracted and instructed by PT Inti Indosawit Subur. Address: Jl. MH. Thamrin No.31 Jakarta Pusat. Contract for transport of CPO and PK. PT Sumber Kencana. Contract based on "Perjanjian Pengangkutan" No.09/X/SK-IIS/2019 dated 1 Oct 2019. Address: Jl. Veteran No.77, Rengat, Riau. Represented by Mr. Djohor Djudin. This contractor was 	<p>Comply</p>

	<p>and instructions for tank movements are controlled by the certified organisation (not the tank farm manager).</p>	<p>appointed, contracted and instructed by PT Inti Indosawit Subur. Address: Jl. MH. Thamrin No.31 Jakarta Pusat. Contract for transport of CPO and PK.</p> <p>Based on the contract article 7 point 1.k. stated that the contractor able to comply to the Supply Chain requirements and able to be audited by internal and external auditor from certification body, if needed.</p> <p>PT Inti Indosawit Subur – Ukui II POM control the outsourced transporter by “Surat Perintah Kerja (SPK)” and “Daftar Periksa Kesiapan Kerja Pengiriman”. SPK covered information as explain in indicator 5.5.2 b. while “Daftar Periksa Kerja” is the tool to control the transporter:</p> <ul style="list-style-type: none"> - Before shipping (completeness of vehicle including legality and safety, tank condition, faucet out, main hole tank, hinge/key lock faucet out); - After shipping (completeness of vehicle including legality and safety, tank condition, faucet out, main hole tank, hinge/key lock faucet out, seal number and seal condition); <p>The quantity of CPO monitored by Weighbridge Card and SPK (with 0.20% tolerance).</p> <p>Palm Kernel:</p> <ul style="list-style-type: none"> • Contract No.07/VIII/BJB-IIS/2019 dated 2 Aug 2019. PT Buana Jaya Bersama. Address: Jl. Siak II, RT 02 RW 03, Kelurahan Bandar Raya, Kecamatan Payung Sekaki, Pekanbaru, Riau. Represented by Mrs. Diana. This contractor was appointed, contracted and instructed by PT Inti Indosawit Subur. Address: Jl. MH. Thamrin No.31 Jakarta Pusat. • Contract No.05/VIII/JB-IIS/2019 dated 2 Aug 2019. CV Jasa Bersama. Address: Jl. Siak No.2 Palas KB 77 km 15, Pekanbaru, Riau. Represented by Mr. Suwito Djingga. This contractor was appointed, contracted and instructed by PT Inti Indosawit Subur. Address: Jl. MH. Thamrin No.31 Jakarta Pusat. 	
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<p>5.5.2</p>	<p>Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following:</p> <p>a) The site has legal ownership of all input material to be included in outsourced processes;</p>	<p>The legal ownership of all CPO and PK owned by PT Inti Indosawit Subur.</p>	<p>Comply</p>
<p>b) The site 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 site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary.</p>	<p>PT IIS was able to demonstrated contract covering the transport process of CPO and PK.</p> <p>CPO:</p> <ul style="list-style-type: none"> • CV Jasa Sahabat Abadi. Contract based on "Perjanjian Pengangkutan" No.08/X/JSA-IIS/2019 dated 1 Oct 2019. Address: Jl. Besar Kisaran, Desa Sidomulyo, Kecamatan Pulo Bandring, Medan. Represented by Mr. Darmin Tanudjaja. This contractor was appointed, contracted and instructed by PT Inti Indosawit Subur. Address: Jl. MH. Thamrin No.31 Jakarta Pusat. Contract for transport of CPO and PK. • PT Sumber Kencana. Contract based on "Perjanjian Pengangkutan" No.09/X/SK-IIS/2019 dated 1 Oct 2019. Address: Jl. Veteran No.77, Rengat, Riau. Represented by Mr. Djohor Djudin. This contractor was appointed, contracted and instructed by PT Inti Indosawit Subur. Address: Jl. MH. Thamrin No.31 Jakarta Pusat. Contract for transport of CPO and PK. <p>Based on the contract article 7 point 1.k. stated that the contractor able to comply to the Supply Chain requirements and able to be audited by internal and external auditor from certification body, if needed.</p> <p>Palm Kernel:</p> <ul style="list-style-type: none"> • PT Buana Jaya Bersama. Contract based on "Perjanjian Pengangkutan" No.07/VIII/BJB-IIS/2019 dated 2 Aug 2019. Address: Jl. Siak II, RT 02 RW 03, Kelurahan Bandar Raya, Kecamatan Payung Sekaki, Pekanbaru, Riau. Represented by Mrs. Diana. This contractor was appointed, 		

	<p>c) The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p>	<p>contracted and instructed by PT Inti Indosawit Subur. Address: Jl. MH. Thamrin No.31 Jakarta Pusat.</p> <p>CV Jasa Bersama. Contract based on "Perjanjian Pengangkutan" No.05/VIII/JB-IIS/2019 dated 2 Aug 2019. Address: Jl. Siak No.2 Palas KB 77 km 15, Pekanbaru, Riau. Represented by Mr. Suwito Djingga. This contractor was appointed, contracted and instructed by PT Inti Indosawit Subur. Address: Jl. MH. Thamrin No.31 Jakarta Pusat.</p> <p>PT Inti Indosawit Subur – Ukui II POM has a Procedure of Traceability (AA-MPM-OP-1400.17-R7) dated 1 Oct 2019. The procedure covers the mechanism of CPO and PK delivery (Chapter B). The CPO and PK transporting also regulated in Work Instruction PUD/IK-SKP/11 as internal control for transporter to ensure compliance with company standard/requirement.</p> <p>Requirement of RSPO Supply Chain Certification related outsourcing process has been mentioned in the contract that signed by the relevant contractors. Dissemination to contractor's driver has been done on 9/10/2019, attended by 13 driver. Dissemination of RSPO Supply Chain requirement to the contractor has been held in PUD on 02/08/2019 with 8 BJB driver; on 03/08/2019 with 8 JSA driver</p>	
<p>5.5.3</p>	<p>The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products. 5.5.4 The site shall at its next audit inform its CB of the names and contact details of any new contractor used for the processing or physical handling of RSPO certified oil palm products.</p>	<p>PT Inti Indosawit Subur – Ukui II POM has record the names and contact details of the transporter, which contain in "Perjanjian Pengangkutan".</p>	<p>Comply</p>
<p>5.5.4</p>	<p>The site shall at its next audit inform its CB of the names and contact details of any new contractor used for the processing or physical handling of RSPO certified oil palm products.</p>	<p>PT Inti Indosawit Subur – Ukui II POM aware to inform its CB regarding the name and contact detail of any new contractor prior to next assessment.</p>	<p>Comply</p>

5.9 Record keeping			
5.9.1	The organisation shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements.	<p>Based on review of PT Inti Indosawit Subur – UKUI II POM document and record, the Mill is able to demonstrate complete, up-to-date and accessible records and reports covering all aspects of RSPO Supply Chain Certification Standard requirements.</p> <p>Records and report verified are as follows:</p> <ul style="list-style-type: none"> • Laporan Harian Pabrik (Mill Daily Report); dated 30 Nov 2019; • Kartu Timbangan (Weighbridge Card) FFB; • Kartu Timbangan (Weighbridge Card) CPO; • Kartu Timbangan (Weighbridge Card) PK. 	Comply
5.9.2	Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.	The procedure of Traceability (AA-MPM-OP-1400.7.R7) dated 1 Oct 2019, section 6.9 requires that all records and reports related to traceability and book keeping are retained for a period of 10 years.	Comply
5.9.3	The organisation shall be able to provide the estimate volume of palm oil / palm kernel oil content (separate categories) in the RSPO certified oil palm product and keep an up to date record of the volume purchased (input) and claimed (output) over a period of twelve (12) months.	<p>PT Inti Indosawit Subur – Ukui II POM is able to provide estimate volume of CPO and PK in a year period as in "Distribusi Produksi Bulanan Anggaran Tahun 2020" consists estimate of FFB receiving from certified source (Soga Estate, Sei Lala Estate and Ukui Plasma), Extraction rates, Processing capacity, working hour and utilisation.</p> <p>The Mill also keep an up to date record of the FFB volume received, CPO and PK produced over a period of twelve (12) month</p>	Comply
D.5.1	The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.	Based on Standard Operating Procedure – Book Keeping (AA-MPM-OP-1400.18-R4) revision dated 25 February 2015, Ukui II POM that applied RSPO Supply Chain model Identity Preserved, only received and process certified FFB. Therefore the mill only record and balance all receipts of certified FFB and deliveries of certified CPO and PK. Book keeping record issued in three-monthly	Comply

		<p>basis: January-March, April-June, July-September, and October-December year 2019.</p> <p>Data verified:</p> <ul style="list-style-type: none"> - Daily Production Report Ukui II POM: "Laporan Harian Pabrik" dated 30 Nov 2019; described FFB received from Soga Estate and Sei Lala Estate on the day is 447.96 MT; todate is 12,270.85 MT; to the Month November is 133,775.63 MT. From Scheme Smallholder (Plasm Ukui) on the day is 45.75 MT; todate is 10,298.30 MT; to the Month November is 128,214.92 MT; total on the day is 493.71 MT; todate is 22,569.15 MT; to the Month November is 261,990.55 MT. Certified CPO produced 119.19 MT; to date 4,851.17 MT; CPO-OER from company-owned estate FFB 22.63% to date 22.46%; CPO-OER from scheme smallholder FFB 20.57% to date 20.38%. Certified Kernel production 30.69 MT to date 1,288.19 MT; KER from company owned estate FFB 5.71% to date 5.71%; KER from scheme smallholder FFB 5.71%; to date 5.71%. - Monthly Production Report "Laporan Unit Pabrik" month November 2018; among others described production and extraction statistic, production stock and losses, daily production, production process comment, production graphic, milling summary and process control and results of analysis. 	
E.5.1	<p>a) The site 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 palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p>	Not applicable	Not applicable

	c) The site can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a site is allowed to sell short. (i.e. product can be sold before it is in stock.)		
5.10 Conversion Factors			
5.10.1	Where applicable, a conversion rate shall be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organisations may determine and set their own conversion rates which shall be based upon past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website (www.rspo.org).	Conversion rate is applied to provide reliable estimation of CPO and PK produced.	Comply
5.10.2	Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.	The actual conversion ratio is monitored on daily basis through sounding result and documented in daily report. PT Inti Indosawit Subur – Ukui II POM is able to demonstrate the work instruction for analysis of oil content. Records and report verified are as follows: <ul style="list-style-type: none"> Laporan Harian Pabrik (Mill Daily Report); dated 30 November 2019 Laporan Harian Pabrik (Monthly Report), month November 2019.	Comply
Processing D.6	The site 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 product including during transport and storage to strive for 100% separation.	PT Inti Indosawit Subur – Ukui II POM has demonstrated clear record as mentioned above that they only received and processed FFB from certified product. Based on Palntation Business Permit (IUP) the permit capacity is 60 ton per hour. PT Inti Indosawit Subur - Ukui II POM demonstrates Standard Operating Procedures – Traceability AA-MPM-OP-1400.17.R7 with latest revision dated 1 Oct 2019. The procedures mentioned that Ukui II POM uses RSPO Supply Chain Certification Standard model IP, therefore Ukui II POM only receives and	Comply

		<p>process certified FFB from certified supply bases, which are from Soga Estate, Sei Lala Estate and 6 scheme smallholder cooperatives, processing of up to shipping of CPO and PK.</p> <p>Ukui II POM has three (3) storage tanks and it was clear that storage tank were only used for CPO from Ukui II POM processing, consist of:</p> <ol style="list-style-type: none"> 1) Bulk Storage Tank 1; capacity 500 MT; 2) Bulk Storage Tank 2; capacity 2,000 MT; 3) Bulk Storage Tank 3; capacity 2,000 MT; <p>For PK storage, the Mill has two (2) silo (bunker) kernel; each capacity 296 MT.</p> <p>Interview with mill worker and site visit revealed that the mill only received and processed FFB from certified product. The Mill has assured that RSPO certified oil palm product is kept segregated from non-certified material including during transport and storage.</p>	
5.6 Sales and goods out			
5.6.1	<p>The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form: The name and address of the buyer;</p> <ul style="list-style-type: none"> • The name and address of the seller; • The loading or shipment / delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; 	<p>PT Inti Indosawit Subur – Ukui II POM has demonstrated SOP of Traceability (AA-MPM-OP-1400.7.R7), chapter 5.2 indicates the Marketing Manager issued Delivery Order (DO) with information: name and address of production unit, name and address of buyer, contract number, type of product transportation (land/sea), distance, type of product (CPO or PK, certified or non-certified), quantity of product, delivery date, product qualification specification (CPO or PK: FFA, water content, dirt), Supply chain model (Mass Balance).</p> <p>At the Mill, weighbridge operator printed out CPO or PK weighbridge card, based on DO from marketing which indicates: type of commodity, CPO or PK certified or not-certified; source and destination address; Supply Chain model:</p>	Major nonconformance

	<ul style="list-style-type: none"> • Supply chain certificate number of the seller; • A unique identification number. • 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). • For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements / Announcements and Confirmations on the RSPO IT platform per shipment or group of shipments. 	<p>(Mass Balance); Certificate number of the Mill; date of delivery, Product quality specification (moisture, FFA, dirt); Contract number/DO number; Quantity, Transport detail (driver name, vehicle number); Buyer address. During this surveillance period, Ukui II POM mostly sold certified product in form of Palm Kernel (PK) to Ukui I Kernel Crushing Plant, that located in the same area of Ukui II POM. There were also several sales of RSPO certified CPO identified during this annual surveillance period.</p> <p>PT Inti Indosawit Subur – Ukui II POM has made Shipping Announcement in RSPO IT Platform to announce sales of RSPO certified CPO or PK per group of shipments (DO). During this surveillance period Ukui II POM sold certified product in form of CSPO and CSPK.</p> <p>Non Conformity: There are discrepancy between Shipping Announcement of CSPO and CSPK in PlamTrace compare to CSPO and CSPK delivery according to monthly Book Keeping of Ukui II POM during period December 2018 to November 2019. It was indicated over sold volume of CSPO and CSPK.</p>	
5.7 Registration of Transactions			
5.7.1	<p>Supply chain actors who:</p> <ul style="list-style-type: none"> • Are mills, traders, crushers and refineries; and • Take legal ownership and/or physically handle RSPO Certified Sustainable oil palm products that are available in the yield scheme of the RSPO IT Platform (Figure 2 and 3, refer Annex 1) shall register their transaction in the RSPO IT platform and confirm upon receipt where applicable. 	<p>PT Inti Indosawit Subur – Ukui II POM is a palm oil mill which takes legal ownership and physically handled RSPO certified sustainable oil palm product (FFB), therefore the site has been registered in RSPO IT Platform with ID number RSPO_PO1000002491.</p>	Comply

<p>5.7.2</p>	<p>The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform: Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement / Announcement in the RSPO IT Platform. The declaration time to do Shipping Announcement / Announcement is based on members' own standard operating procedures.</p> <p>Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace document with a unique traceability number. Tracing can be done in a consolidated way at least annually.</p> <p>Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed.</p> <p>Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements.</p>	<p>PT Inti Indosawit Subur – Ukui II POM has made Shipping Announcement in RSPO IT Platform to announce sales of RSPO certified CPO or PK per group of shipments (DO). During this surveillance period UKUI II POM sold certified product in form of CSPO and CSPK.</p> <p>Samples seen:</p> <ol style="list-style-type: none"> Shipping Announcement, with transaction ID TR-0fe253b1-b3fd dated 8 May 2019 for 50 MT of CSPO; from PT Inti Indosawit Subur – UKUI II Mill (RSPO_PO10000002491) as Seller to Buyer PT Sari Dumai Sejati (RSPO-P01000006430). Based on: <ul style="list-style-type: none"> Contract No.02033/DC10/02/19; DO No.02033/DC10/02/19 dated 28 Feb 2019 (750 MT); Weighbridge Card No.PUDC119100416 dated 05/03/2019; product is CPO certified RSPO; Nett weight is 20,770 kg; SC model is Identity Preserved; certificate is RSPO 565807; transporter CV Jasa Sahabat Abadi (JSA/03/2019); BK 8511 VO; driver Frengki Pardamean; deliver to PT Sari Dumai Sejati (Lubuk Gaung, Dumai). Along with weighbridge card No.PUDC119100391 to PUDC119100417. Shipping Announcement, with transaction ID TR-f0eb18a3-488a dated 07/08/2019 for 1,000 MT of CSPO; from PT Inti Indosawit Subur – UKUI II Mill (RSPO_PO10000002491) as Seller to Buyer PT Sari Dumai Sejati (RSPO-P01000006430). Based on: <ul style="list-style-type: none"> Contract No.03025/CC10/02/19; No.05039/CC10/02/19; No.06002/CC10/02/19. DO No.03025/DC10/02/19 dated 15/03/2019 (331.157 MT); DO No.05039/DC10/02/19 dated 28/05/2019 (500 MT); DO No.06002/DC10/02/19 dated 11/06/2019 (168.843 MT). Weighbridge Card No.PUDC119100473 dated 15/03/2019; product is CPO certified RSPO; Nett weight is 28,170 kg; SC model is Identity Preserved; certificate is RSPO 565807; transporter CV Jasa Sahabat Abadi (JSA/03/2019); BK 9243 VV; driver Ahmad Yanis; deliver to PT Sari Dumai Sejati (Lubuk Gaung, Dumai). Along with weighbridge card 	<p>Comply</p>
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		<p>No.PUDC119100471 to PUDC119100771 (750 MT); No.PUDC119100874 to PUDC119100891 (500 MT); No.PUDC119100891 to PUDC119100919 (800 MT).</p> <p>3. Shipping Announcement, with transaction ID TR-ea36dfd6-59a4 dated 30/10/2019 for 2,000 MT of CSPO; from PT Inti Indosawit Subur – UKUI II Mill (RSPO_PO10000002491) as Seller to Buyer PT Sari Dumai Sejati (RSPO-P01000006430). Based on:</p> <ul style="list-style-type: none"> o Contract No.09027/CC10/02/19; No.09041/CC10/02/19; No.10007/CC10/02/19; No.10015/CC10/02/19; No.10020/CC10/02/19. o DO No.09027/DC10/02/19 dated 18/09/2019 (86.077 MT); DO No.09041/DC10/02/19 dated 24/09/2019 (17.320 MT); DO No.10007/DC10/02/19 dated 04/10/2019 (1,500.000 MT); No.10015/DC10/02/19 dated 11/10/2019 (0.162 MT); No.10020/DC10/02/19 dated 04/10/2019 (396.441 MT). o Weighbridge Card No.PUDC119201531 dated 24/09/2019; product is CPO certified RSPO; Nett weight is 30,910 kg; SC model is Identity Preserved; certificate is RSPO 565807; transporter CV Jasa Sahabat Abadi (JSA/09/2019); BK 9207 VW; driver Jumain; deliver to PT Sari Dumai Sejati (Lubuk Gaung, Dumai). Along with weighbridge card No.PUDC119201521 to No.PUDC119201531 (350 MT); No.PUDC119201532 (17.32 MT); No.PUDC119201572 to No.PUDC119201649 (1,500 MT); No.PUDC119201649 to No.PUDC119201684 (1,000 MT); No.PUDC119201684 to No.PUDC119201723 (1,000 MT). <p>4. Shipping Announcement, with transaction ID TR-0e566584-8094 dated 30/05/2019 for 2,636.52 MT of CSPK; from PT Inti Indosawit Subur – Ukui II Mill (RSPO_PO10000002491) as Seller to Buyer PT Inti Indosawit Subur – Ukui I KCP (RSPO-P01000002724). Based on:</p> <ul style="list-style-type: none"> o DO No.02309/DC10/13/19 dated 03/03/2019 (250 MT); o DO No.03302/DC10/13/19 dated 04/03/2019 (250 MT); o DO No.03304/DC10/13/19 dated 06/03/2019 (250 MT); 	
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		<ul style="list-style-type: none"> ○ DO No.03308/DC10/13/19 dated 07/03/2019 (250 MT); ○ DO No.03311/DC10/13/19 dated 15/03/2019 (250 MT); ○ DO No.03314/DC10/13/19 dated 21/03/2019 (300 MT); ○ DO No.04305/DC10/13/19 dated 09/04/2019 (300 MT); ○ DO No.04310/DC10/13/19 dated 12/04/2019 (300 MT); ○ DO No.04314/DC10/13/19 dated 23/04/2019 (250 MT); ○ DO No.04315/DC10/13/19 dated 26/04/2019 (250 MT); ○ Weighbridge Card No.PUDC219100149 dated 09/03/2019; product is PK certified RSPO; Nett weight is 21,090 kg; SC model is Identity Preserved; certificate is RSPO 565807; transporter PT Buana Jaya Bersama (SP 38283); BM 9542 RC; driver Supriyadi; deliver to PT Inti Indosawit Subur – Ukui I KCP. Based on DO DO No.03302/DC10/13/19 dated 04/03/2019 (250 MT). <p>5. Shipping Announcement, with transaction ID TR-e9a3e00c-c624 dated 18/09/2019 for 1,105.24 MT of CSPK; from PT Inti Indosawit Subur – Ukui II Mill (RSPO_PO10000002491) as Seller to Buyer PT Inti Indosawit Subur – Ukui I KCP (RSPO-P01000002724). Based on:</p> <ul style="list-style-type: none"> ○ DO No.05302/DC10/13/19 dated 08/05/2019 (400 MT); ○ DO No.05309/DC10/13/19 dated 17/05/2019 (250 MT); ○ DO No.05312/DC10/13/19 dated 24/05/2019 (200 MT); ○ DO No.05313/DC10/13/19 dated 28/05/2019 (300 MT); ○ Weighbridge Card No.PUDC219100309 dated 28/05/2019; product is PK certified RSPO; Nett weight is 21,310 kg; SC model is Identity Preserved; certificate is RSPO 565807; transporter PT Buana Jaya Bersama (SP 40307); BM 9542 RC; driver Supriyadi; deliver to PT Inti Indosawit Subur – Ukui I KCP. Based on DO No.5309/DC10/13/19 dated 17/05/2019 (250 MT). <p>The company has done "Remove" for certified product sold as another scheme (ISCC), according to transaction ID:</p> <ol style="list-style-type: none"> 1. TR-f91430a0-bb96 dated 13/12/2019; product is CSPO; volume remove is 35,087.06 MT; reason for removal is sold as ISCC. 	
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		2. TR-0d527499-afbd dated 13/12/2019; product is CSPO; volume remove is 5,042.27 MT; reason for removal is sold as ISCC.	
5.11 Claims			
5.11.1	The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules on Market Communications and Claims.	PT Inti Indosawit Subur – Ukui II POM has made claims regarding the support of RSPO certified oil palm products only through Delivery document, such as Delivery Order and Weighbridge Card. By stating the RSPO certified number and the supply chain model. The organization aware about the RSPO Rules on Market Communications and Claims.	Comply
General corporate communications			
4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	PT. Inti Indosawit Subur (with the brand Asian Agri), the parent company of Ukui II POM is highlighting its commitment to the principles of RSPO, and directly referring to RSPO website. The corporate communication can be found at http://www.asianagri.com .	Comply
4.2	In corporate communications a member is allowed to: <ul style="list-style-type: none"> a. Display its RSPO membership status b. Display the RSPO web address (www.rspo.org) c. State that the member supports the work of the RSPO d. State the member's history with regard to the RSPO. e. 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>	PT. Inti Indosawit Subur (with the brand Asian Agri), in its website: <ul style="list-style-type: none"> a. Display its RSPO membership status: No, PT. Inti Indosawit Subur (with the brand Asian Agri), did not display its RSPO membership status. The CH only stated "In 2006, became a member of the Roundtable of Sustainable Palm Oil. We received our first RSPO certification for our estate in 2010." b. Display the RSPO web address: Not in direct manner. PT. Inti Indosawit Subur (with the brand Asian Agri), made a link to RSPO website. c. State the member supports the work of the RSPO: Not in direct manner. In the website, PT. Inti Indosawit Subur (with the brand Asian Agri), "In 2006, became a member of the Roundtable of Sustainable Palm Oil. We received our first RSPO certification for our estate in 2010." d. State the member's history with regards to the RSPO: Not in direct manner. In the website, In the website, PT. Inti Indosawit Subur (with the brand Asian Agri), "In 2006, became a member of the Roundtable of Sustainable Palm Oil. We received our first RSPO certification for our estate in 2010, and in 2012, the certification for our smallholder scheme." 	Comply

		Use of RSPO Trademark to promote its membership of the RSPO: No, PT. Inti Indosawit Subur (with the brand Asian Agri), did not use RSPO trademark in its corporate communication such in website.	
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.	No, PT. Inti Indosawit Subur (with the brand 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.	Comply
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.	No, PT. Inti Indosawit Subur (with the brand 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 PT. Inti Indosawit Subur – Ukui II POM own products.	Comply
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	No, PT. Inti Indosawit Subur (with the brand Asian Agri) did not display its RSPO Corporate Logo in any document.	Comply
Business to business communications			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	There was no use of RSPO trademark and/or RSPO corporate logo in business to business communication related to RSPO certified product; between PT. Inti Indosawit Subur – Ukui II POM and their buyers.	Comply
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	When confirming the sales of certified oil palm products, PT. Inti Indosawit Subur – Ukui II POM followed the requirements of the RSPO SCCS. PT. Inti Indosawit Subur – Ukui II POM stating the supply chain model and certificate number under which the claim is being made.	Comply
5.3	Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the	PT. Inti Indosawit Subur – Ukui II POM is not a distributor and/or wholesaler. Not applicable.	

	<p>requirements of the RSPO SCCS can follow either of two options:</p> <ul style="list-style-type: none"> e. 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. f. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2. 		Not applicable
5.4	<p>A certified member can provide information to its customers detailing the presence of certified palm oil contained within a product even if it is not eligible for a product-specific under RSPO rules. The end product must not be labelled as certified or sold in such a way that implies RSPO certification.</p> <p>For example, a retailer or food service company may require a breakdown of all palm based ingredients within an end product and the certified status of each. This information may be provided by a certified RSPO member without constituting a product-specific claim.</p>	<p>PT. Inti Indosawit Subur – Ukui II POM is not producing or selling end-product to consumer. No labelling on product whatsoever.</p> <p>Not applicable.</p>	Not applicable
Business to consumer communication			
6.1	<p>Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within</p>	<p>PT. Inti Indosawit Subur – Ukui II POM is producing and selling CSPO and CSPK; and not making a business to consumer communication.</p>	Not applicable

	product(s), which are known as 'product-specific' claims. Product-specific claims are voluntary.	Not applicable.	
6.2	Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below.	PT. Inti Indosawit Subur – Ukui II POM is not using RSPO trademark and/or RSPO label. PT. Inti Indosawit Subur – Ukui II POM is producing and selling CSPO and CSPK; and not making a business to consumer communication. Not applicable.	Not applicable
6.3	When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.	PT. Inti Indosawit Subur – Ukui II POM is not using RSPO-certified on-pack claim. PT. Inti Indosawit Subur – Ukui II POM is producing and selling CSPO and CSPK; and not making a business to consumer communication. Not applicable.	Not applicable
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	PT. Inti Indosawit Subur – Ukui II POM is not making any claim related to their RSPO membership status. PT. Inti Indosawit Subur – Ukui II POM is producing and selling CSPO and CSPK; and not making a business to consumer communication. Not applicable.	Not applicable
6.5	Members shall not communicate to consumers information about their suppliers' RSPO membership status.	PT. Inti Indosawit Subur – Ukui II POM is not making any information about their supplier's RSPO membership status. PT. Inti Indosawit Subur – Ukui II POM is producing and selling CSPO and CSPK; and not making a business to consumer communication. Not applicable.	Not applicable
6.6	Use of the RSPO trademark is restricted to claims about RSPO-certified sustainable palm oil products and it is not authorised for use in relation to any other ingredient.	PT. Inti Indosawit Subur – Ukui II POM is not using RSPO trademark and/or RSPO label. Not applicable.	Not applicable
6.7	Use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorised product-specific claim.	PT. Inti Indosawit Subur – Ukui II POM is not using RSPO trademark and/or RSPO label. Not applicable.	Not applicable
6.8	RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business	PT. Inti Indosawit Subur – Ukui II POM is not retailers or food service company. Not applicable.	Not applicable

	<p>to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules applying to RSPO supply chain certified members. The guidance document for audits is available on www.rspo.org.</p>		
<p>Principle 4: Respect community and human rights and deliver benefit Respect community rights, provide equal opportunities, maximise benefits from engagement and ensure remediation where needed.</p>			
<p>Criteria 4.1 The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.</p>			
<p>4.1.1</p>	<p>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, supply chain and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p>	<p>The Company already has a Policy to respect human rights as outlined in the Corporate Policy issued by the Managing Director of Asian Agri on 1 December 2014. Point 13 of the policy states that "<i>The Company respects human rights by treating all employees fairly, in recruitment, performance assessment, conditions and work environment and representation irrespective of tribe, caste, nationality, religion, disability, gender, sexual orientation, union membership, political affiliation and/or age</i>".</p>	<p>Major nonconformance</p>

		<p>Non-Conformity:</p> <p>The Company already has a Policy to respect human rights as outlined in the Corporate Policy issued by the Managing Director of Asian Agri on 1 December 2014, especially at Point 13. However the policy does not mentioned about prohibiting retaliation against Human Rights Defenders (HRD), prohibits intimidation and harassment by the unit of certification and contracted services.</p>	
4.1.2	The unit of certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations.	Based on interview to all level of workers, contractors, scheme smallholders and stakeholders, confirm that the unit of certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations.	Comply
<p>Criteria 4.2</p> <p>There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.</p>			
4.2.1	<p>(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p>	<p>Soga Estate & Sei Lala Estate:</p> <p>Unit of Certification has established mechanism to handle complaint and grievances, "SOP Penanganan Keluhan dari Eksternal No.AA-GL-5005-R0 01" explains mechanism to resolve external complaint; "SOP Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan No.AA-HR-308 0.5R0" related to internal grievance mechanism, for employee, Company also provides comment box at each unit office; and there is a mechanism for land dispute resolution, "SOP Penanganan Konflik Lahan AA-GL-5003.1-R1" effective 22/08/2011 related to land conflict. The procedure covers land dispute handling mechanism, negotiation process, and verification upon legal ownership evidence up to land compensation. Should negotiation process fails, any land dispute will be processed through legal/litigation mechanism. During the process, a complete record is maintained. Based on mechanism, public</p>	Major nonconformance

		<p>relation officer will receive information of any complaint, grievance and land dispute/claims and records under the logbook.</p> <p>There is no land dispute noted, based on stakeholder consultation.</p> <p>However, resolve disputes system which developed by unit of certification is not follows the RSPO policy on respect for Human Right Defender (HRD). It is found within:</p> <ul style="list-style-type: none"> - Company Policy related to respect for Human Right Defender (HRD) without risk of reprisal or intimidation is not approved. - "SOP Penanganan Keluhan Masyarakat" No: AA-GL-510.1-R0, dated 1 January 2013 was not refer to policy on respect for HRD. <p>Plasma UKUI (Smallholder Scheme): The Smallholder Manager has established mechanism for communication and consultation "Mekanisme Komunikasi dan Konsultasi" dated 16 January 2017, shaped flow Chart that describes the process of incoming information requests up to the responses provided. Each smallholder member has "Buku Panduan dan Catatan Petani Plasma", whereas explains the flow process of communication. Both of communication by written or verbal communication to group management are acceptable. For internal communication, The Smallholder Manager has prepared the procedure on "Komunikasi Internal Group Sertifikasi". SOP No. 007/DOK/SOP/PT IIS KLU-AA/2016 dated 26 November 2016. The SOP describes the relevant internal communication mechanisms of Group members, Extension Officers, Smallholder Manager and Group Managers. The Group Manager is responsible for responding to the Group's internal communications.</p> <p>Based on interview with sample of smallholders in KUD Usaha Tani, KUD Trani Maju and Mekar Abadi, there is no dispute raise to the company.</p>	
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4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.	<p>Soga Estate & Sei Lala Estate: "SOP Penanganan Konflik Lahan AA-GL-5003.1-R1" effective 22/08/2011 related to land conflict. The procedure covers land dispute handling mechanism, negotiation process, and verification upon legal ownership evidence up to land compensation. This procedure is available in place and understood by the affected parties.</p> <p>Plasma UKUI (Smallholder Scheme): "Komunikasi Internal Group Sertifikasi". SOP No. 007/DOK/SOP/PT IIS KLU-AA/2016 dated 26 November 2016. This procedure is available in place and understood by the smallholders.</p>	Comply
4.2.3	The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.	Based on interview with relevant stakeholders during surveillance audit, there is no grievance or conflict raised against unit of certification both company and smallholders.	Comply
4.2.4	The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.	Based on interview with relevant stakeholders during surveillance audit, there is no grievance or conflict raised against unit of certification both company and smallholders.	Comply
<p>Criteria 4.3 The unit of certification contributes to local sustainable development as agreed by local communities.</p>			
4.3.1	Contributions to community development that are based on the results of consultation with local communities are demonstrated.	<p>In 2019 period, the company has established CSR program is recorded on CSR Project Tracking 2019, consisting 6 types of activities, such as Social, Economy, Education, Health, Infrastructure and Environment.</p> <p>The creation of the CSR program is done by coordinating with the local village head through the SIA report and monitoring. (see 3.4)</p> <p>CSR program have been implemented in 2019 for example:</p> <ol style="list-style-type: none"> 1. Social aspects: 	Comply

		<ul style="list-style-type: none"> - Assistance to poors/orphans in Bukit Jaya Village, Kampung Baru, Silikuan Hulu, Sei Beras, Rice Mekar, Air Putih, etc. - Religious activity; do Ramadan safaris in Bukit Jaya Village, Kampung Baru, Silikuan Hulu, Sei Beras-Rice, Pontian Mekar, Air Putih, etc. <p>2. Economi aspects:</p> <ul style="list-style-type: none"> - Providing palm oil seedlings for the community of Independent Palm Village for area of 2.7 hectares. - Assistance for cattle rolling in SP-5 Ukui-2 Village <p>3. Education aspects:</p> <ul style="list-style-type: none"> - Providing equipment support for elementary schools in Ukui Village 2 <p>4. Health care aspects:</p> <ul style="list-style-type: none"> - Providing free medical check-up and medical assistance in Silikuan Hulu Village - Conducting health and nutrition checks for toddlers in Silikuan Hulu Village <p>5. Infrastructure aspects:</p> <ul style="list-style-type: none"> - Repairing roads in the 8 km Bagan Limau Village by using heavy equipment - Repairing road in the village of Air Hitam along 5 KM by using heavy equipment - Repairing the road in the village of Lubuk Kembang Bungo along the 5 Km by using heavy equipment - Providing heavy equipment and material assistance to repair concrete bridges in Lubuk Kembang Sari Village - Providing assistance for the construction of a Customary Hall in Ukui-2 Village - Providing material assistance in building halls in the village of Ukui-2 <p>Realization ofCSR Year 2019 Program:</p> <ul style="list-style-type: none"> - May 16, 2019; giving aid of 20 sacks of rice (@ 5 kg), 2 units of emergency lights, 1 unit of prayer mat to Pangkajang Village and 1 unit of fan to each of Lubuk Kembang Sari and Air Village. 	
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		<ul style="list-style-type: none"> - On July 1, 2019, provided a financial aid package for schoolchildren amounting to IDR 15,000,000 to schoolchildren in Ukui Village 2. - On 31 August 2019, assistance for free health screening activities to 120 people in the village of Silikuan Hulu. - On 12 June 2019, provided additional food assistance in the Silikuan Hulu Village. <p>On 15 March 2019, provided assistance to build a small mosque in Lubuk Kembang Sari Village, including materials in the form of: 20-sheet boards, 1.5 cubic broti wood and 1 kodi zinc.</p>										
<p>Criteria 4.4 Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.</p>												
<p>4.4.1</p>	<p>(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents related to the history of land tenure and the actual legal or customary use of the land are available.</p>	<p>Unit of certification within this scope are UKUI-II Mill supplied by SOGA Estate, SEI LALA Estate and 6 Smallholders Cooperatives. Legal requirements of land use rights in Indonesia is recognize as "Hak Guna Usaha" or Land Title. Where the Land Title issued by National Land Department. The legal land use-rights for this scope as follow:</p> <table border="1" data-bbox="1003 922 1823 1313"> <thead> <tr> <th data-bbox="1003 922 1193 986">Estates</th> <th data-bbox="1193 922 1323 986">Area (Ha)*</th> <th data-bbox="1323 922 1823 986">Land Title</th> </tr> </thead> <tbody> <tr> <td data-bbox="1003 986 1193 1121">Soga</td> <td data-bbox="1193 986 1323 1121">2,988</td> <td data-bbox="1323 986 1823 1121">HGU Certificate No. 013, 6 Jul 2009. Exp: 9 Jun 2044. Total area: 2,704.22 Ha. SK. Ka. BPN RI No: 78-HGU-BPN RI-2008, dated 19 Dec 2008.</td> </tr> <tr> <td data-bbox="1003 1121 1193 1313">Sei Lala</td> <td data-bbox="1193 1121 1323 1313">3,178</td> <td data-bbox="1323 1121 1823 1313">HGU Certificate No. 016, 3 Nov 2010. Exp: 3 Nov 2045. Total area: 299.51 Ha. (remain area is from HGU certificate No. 01 Year 1989 with area 6,727.40 Ha) SK Ka. BPN No: 156/HGU/BPN/2004, dated 11 November 2004.</td> </tr> </tbody> </table>	Estates	Area (Ha)*	Land Title	Soga	2,988	HGU Certificate No. 013, 6 Jul 2009. Exp: 9 Jun 2044. Total area: 2,704.22 Ha. SK. Ka. BPN RI No: 78-HGU-BPN RI-2008, dated 19 Dec 2008.	Sei Lala	3,178	HGU Certificate No. 016, 3 Nov 2010. Exp: 3 Nov 2045. Total area: 299.51 Ha. (remain area is from HGU certificate No. 01 Year 1989 with area 6,727.40 Ha) SK Ka. BPN No: 156/HGU/BPN/2004, dated 11 November 2004.	<p>Comply</p>
Estates	Area (Ha)*	Land Title										
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		Smallholders	Area (Ha)*	Land Title	
		KUD Tani Subur	780	SHM (Certificate of Land Ownership)	
		KUD Karya Tani	734	SHM (Certificate of Land Ownership)	
		KUD Mekar Abadi	574	SHM (Certificate of Land Ownership)	
		KUD Trani Maju	962	SHM (Certificate of Land Ownership)	
		KUD Tani Bahagia	1,366	SHM (Certificate of Land Ownership)	
		KUD Usaha Tani	1,292	SHM (Certificate of Land Ownership)	
		TOTAL	11,874		
		<p>* based on Area Statement November 2019.</p> <p>This information has been explained within Criteria 2.1 above.</p>			
4.4.2	<p>Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:</p> <p>4.4.2a Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making</p> <p>4.4.2b Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken</p>	<p>PT. Inti Indosawit Subur is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. The land status is clear and no land disputes raised. Copies of documents evidencing agreement-making processes and negotiated agreement detailing the FPIC process are obsolete.</p> <p>PT. Inti Indosawit Subur is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. The land status is clear and</p>			Comply

		no land disputes raised. Copies of documents evidencing agreement-making processes and negotiated agreement detailing the FPIC process are obsolete.	
	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.	PT. Inti Indosawit Subur is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. The land status is clear and no land disputes raised. Copies of documents evidencing agreement-making processes and negotiated agreement detailing the FPIC process are obsolete.	
4.4.3	(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).	<p>Soga Estate & Sei Lala Estate: Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are available within HGU map namely "Peta Gambar Situasi Khusus". This map is attached within HGU certificate.</p> <p>Ukui Smallholders: Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are available within Certificate of Land Ownership or "Sertipikat Hak Milik" in each smallholders.</p>	Comply
4.4.4	All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.	<p>Estate: PT Inti Indosawit Subur – Ukui Group is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main Estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Soga Estate and Sei Lala Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p>Plasma UKUI (Smallholder Scheme): During field observation and interview with sample of smallholders at KUD Usaha Tani, KUD Trani Maju and Mekar Abadi, there is no land dispute within</p>	Comply

		smallholders area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights	
4.4.5	(C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.	<p>Estate: PT Inti Indosawit Subur – Ukui Group is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main Estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Soga Estate and Sei Lala Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p>Plasma UKUI (Smallholder Scheme): During field observation and interview with sample of smallholders at KUD Usaha Tani, KUD Trani Maju and Mekar Abadi, there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights</p>	Comply
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.	PT. Inti Indosawit Subur is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. The land status is clear and no land disputes raised. Copies of documents evidencing agreement-making processes and negotiated agreement detailing the FPIC process are obsolete.	Comply
<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.	<p>Estate: Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State</p>	Comply

		<p>Land and no land compensation was made. Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main Estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Soga Estate and Sei Lala Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p>Plasma UKUI (Smallholder Scheme): During field observation and interview with sample of smallholders at KUD Usaha Tani, KUD Trani Maju and Mekar Abadi, there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights</p>	
<p>4.5.2</p>	<p>(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, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.</p>	<p>Estate: Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation with through FPIC mechanism was made.</p> <p>Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main Estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Soga Estate and Sei Lala Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p>Plasma UKUI (Smallholder Scheme): During field observation and interview with sample of smallholders at KUD Usaha Tani, KUD Trani Maju and Mekar Abadi, there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained</p>	<p>Comply</p>

		based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights	
4.5.3	Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.	<p>Estate:</p> <p>Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation with through FPIC mechanism was made.</p> <p>Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main Estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Soga Estate and Sei Lala Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p>Plasma UKUI (Smallholder Scheme):</p> <p>During field observation and interview with sample of smallholders at KUD Usaha Tani, KUD Trani Maju and Mekar Abadi, there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights</p>	Comply
4.5.4	To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.	<p>Estate:</p> <p>Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation with through FPIC mechanism was made.</p> <p>Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main Estate roads. This was confirmed during interview with company representative and stakeholder</p>	Comply

		<p>consultation with local community. Based on Soga Estate and Sei Lala Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p>Plasma UKUI (Smallholder Scheme): During field observation and interview with sample of smallholders at KUD Usaha Tani, KUD Trani Maju and Mekar Abadi, there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights</p>	
4.5.5	<p>Evidence is available that the affected communities and rights holders have had the option to access to 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>Estate: Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation with through FPIC mechanism was made.</p> <p>Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main Estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Soga Estate and Sei Lala Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p>Plasma UKUI (Smallholder Scheme): During field observation and interview with sample of smallholders at KUD Usaha Tani, KUD Trani Maju and Mekar Abadi, there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights</p>	Comply

<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>Estate: Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation with through FPIC mechanism was made. Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main Estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Soga Estate and Sei Lala Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p>Plasma UKUI (Smallholder Scheme): During field observation and interview with sample of smallholders at KUD Usaha Tani, KUD Trani Maju and Mekar Abadi, there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights.</p>	<p>Comply</p>
<p>4.5.7</p>	<p>New lands will not be acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations in the national interest without consent (eminent domain), except in cases of smallholders benefitting from agrarian reform or anti-drug programmes.</p>	<p>Estate: Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation with through FPIC mechanism was made. Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main Estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Soga Estate and Sei Lala Estate area statement documents, interview with communities and stakeholder</p>	<p>Comply</p>

		<p>consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p>Plasma UKUI (Smallholder Scheme): During field observation and interview with sample of smallholders at KUD Usaha Tani, KUD Trani Maju and Mekar Abadi, there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights.</p>	
4.5.8	<p>(C) New lands are not acquired in areas inhabited by communities in voluntary isolation.</p>	<p>Estate: Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation with through FPIC mechanism was made.</p> <p>Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main Estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Soga Estate and Sei Lala Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p>Plasma UKUI (Smallholder Scheme): During field observation and interview with sample of smallholders at KUD Usaha Tani, KUD Trani Maju and Mekar Abadi, there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights.</p>	Comply
<p>Criteria 4.6</p>			

Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.		
4.6.1	<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>Estate:</p> <p>Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation with through FPIC mechanism was made.</p> <p>Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main Estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Soga Estate and Sei Lala Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p>Plasma UKUI (Smallholder Scheme):</p> <p>During field observation and interview with sample of smallholders at KUD Usaha Tani, KUD Trani Maju and Mekar Abadi, there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights.</p>
4.6.2	<p>(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p>	<p>Estate:</p> <p>Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation with through FPIC mechanism was made.</p> <p>Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main Estate roads. This was confirmed during interview with company representative and stakeholder</p>

		<p>consultation with local community. Based on Soga Estate and Sei Lala Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p>Plasma UKUI (Smallholder Scheme): During field observation and interview with sample of smallholders at KUD Usaha Tani, KUD Trani Maju and Mekar Abadi, there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights.</p>	
4.6.3	<p>Evidence is available that equal opportunities are provided to both men and women to hold land titles for small holdings.</p>	<p>Estate: Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation with through FPIC mechanism was made.</p> <p>Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main Estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Soga Estate and Sei Lala Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p>Plasma UKUI (Smallholder Scheme): During field observation and interview with sample of smallholders at KUD Usaha Tani, KUD Trani Maju and Mekar Abadi, there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights.</p>	Comply

4.6.4	The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.	<p>Estate:</p> <p>Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation with through FPIC mechanism was made.</p> <p>Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main Estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Soga Estate and Sei Lala Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p>Plasma UKUI (Smallholder Scheme):</p> <p>During field observation and interview with sample of smallholders at KUD Usaha Tani, KUD Trani Maju and Mekar Abadi, there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights.</p>	Comply
<p>Criteria 4.7</p> <p>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	(C) A mutually agreed procedure for identifying people entitled to compensation is in place.	<p>Estate:</p> <p>Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation with through FPIC mechanism was made.</p> <p>Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main Estate roads. This was</p>	Comply

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4.7.2	<p>(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.</p>	<p>Estate: Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation with through FPIC mechanism was made.</p> <p>Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main Estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Soga Estate and Sei Lala Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p>Plasma UKUI (Smallholder Scheme): During field observation and interview with sample of smallholders at KUD Usaha Tani, KUD Trani Maju and Mekar Abadi, there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights.</p>	Comply

4.7.3	Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.	<p>Estate:</p> <p>Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation with through FPIC mechanism was made.</p> <p>Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main Estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Soga Estate and Sei Lala Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p>Plasma UKUI (Smallholder Scheme):</p> <p>During field observation and interview with sample of smallholders at KUD Usaha Tani, KUD Trani Maju and Mekar Abadi, there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights.</p>	Comply
<p>Criteria 4.8</p> <p>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	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>Estate:</p> <p>Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation with through FPIC mechanism was made.</p> <p>Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main Estate roads. This was confirmed during interview with company representative and stakeholder</p>	Comply

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<p>4.8.2</p>	<p>(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.</p>	<p>Estate: Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation with through FPIC mechanism was made.</p> <p>Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main Estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Soga Estate and Sei Lala Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p>Plasma UKUI (Smallholder Scheme): During field observation and interview with sample of smallholders at KUD Usaha Tani, KUD Trani Maju and Mekar Abadi, there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights.</p>	<p>Comply</p>

<p>4.8.3</p>	<p>Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use right, there claims will be settled using the relevant requirements (Indicator 4.4.2, 4.4.3 and 4.4.4)</p>	<p>Estate: Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation with through FPIC mechanism was made. Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main Estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Soga Estate and Sei Lala Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities. Plasma UKUI (Smallholder Scheme): During field observation and interview with sample of smallholders at KUD Usaha Tani, KUD Trani Maju and Mekar Abadi, there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights.</p>	<p>Comply</p>
<p>4.8.4</p>	<p>For any conflict or dispute over the land, the extent of the disputed area is mapped out in participatory way with involvement of affected parties (including neighbouring communities where applicable)</p>	<p>Estate: Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation with through FPIC mechanism was made. Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main Estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Soga Estate and Sei Lala Estate area statement documents, interview with communities and stakeholder</p>	<p>Comply</p>

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<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>																	
5.1.1	<p>Current and previous period prices paid for FFB are publicly available and accessible by smallholders.</p>	<p>FFB price for Scheme Smallholders are based on "Hasil Penetapan Harga TBS Kelapa Sawit Provinsi Riau" issued by FFB pricing team of Riau Province. It was available FFB price letter No.47/TPH TBS-XII/2019 dated 3 Dec 2019 for period 4 – 10 Dec 2019.</p> <p>The price are:</p> <table border="1" data-bbox="1003 1018 1368 1372"> <thead> <tr> <th>Oil palm age (year)</th> <th>FFB price (Rp/kg)</th> </tr> </thead> <tbody> <tr> <td>3</td> <td>1,337.63</td> </tr> <tr> <td>4</td> <td>1,448.84</td> </tr> <tr> <td>5</td> <td>1,583.39</td> </tr> <tr> <td>6</td> <td>1,621.40</td> </tr> <tr> <td>7</td> <td>1,684.61</td> </tr> <tr> <td>8</td> <td>1,731.11</td> </tr> </tbody> </table>	Oil palm age (year)	FFB price (Rp/kg)	3	1,337.63	4	1,448.84	5	1,583.39	6	1,621.40	7	1,684.61	8	1,731.11	Comply
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5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe.	Contracts are fair, legal and transparent and have an agreed timeframe, as seen in indicator 2.2.2.	Comply																																																																					
5.1.6	(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.	<p>Payments are made in timely manner and receipts specifying price, weight, deductions and amount paid are available.</p> <p>Sample seen:</p> <p>Calculation and Payment of FFB</p> <p>Farmer Group No.149; Panca Usaha; KUD Usaha Tani</p> <p>Period: Oct 2019</p> <table> <tr> <td>FFB received (21 - 24 Sep 2019)</td> <td>=</td> <td>-</td> <td>kg</td> <td>X</td> <td>1,251.39</td> <td>=</td> <td>-</td> </tr> <tr> <td>FFB received (25 Sep - 1 Oct 2019)</td> <td>=</td> <td>19,257</td> <td>kg</td> <td>X</td> <td>1,281.26</td> <td>=</td> <td>24,673,224</td> </tr> <tr> <td>FFB received (2 - 8 Oct 2019)</td> <td>=</td> <td>16,526</td> <td>kg</td> <td>X</td> <td>1,254.47</td> <td>=</td> <td>20,731,371</td> </tr> <tr> <td>FFB received (9 - 15 Oct 2019)</td> <td>=</td> <td>17,046</td> <td>kg</td> <td>X</td> <td>1,259.81</td> <td>=</td> <td>21,474,721</td> </tr> <tr> <td>FFB received (16 - 20 Oct 2019)</td> <td>=</td> <td>-</td> <td>kg</td> <td>X</td> <td>1,283.24</td> <td>=</td> <td>-</td> </tr> <tr> <td>Total</td> <td>=</td> <td>52,829</td> <td>kg</td> <td></td> <td></td> <td>=</td> <td>66,879,316</td> </tr> </table> <table> <tr> <td>Deduction</td> <td></td> <td></td> </tr> <tr> <td>KUD deduction+ Idapertabun (20 kk)</td> <td>=</td> <td>17,133,074</td> </tr> <tr> <td>Aspekpir Fund</td> <td>=</td> <td>26,415</td> </tr> <tr> <td>Duty stamp</td> <td></td> <td>6,000</td> </tr> <tr> <td>JIn Poros Plasma SKP.II (Rp.6/kg)</td> <td>=</td> <td>316,974</td> </tr> <tr> <td>Total Deduction</td> <td>=</td> <td>17,482,463</td> </tr> </table> <table> <tr> <td>Amount Received</td> <td>=</td> <td>49,396,853</td> </tr> </table>	FFB received (21 - 24 Sep 2019)	=	-	kg	X	1,251.39	=	-	FFB received (25 Sep - 1 Oct 2019)	=	19,257	kg	X	1,281.26	=	24,673,224	FFB received (2 - 8 Oct 2019)	=	16,526	kg	X	1,254.47	=	20,731,371	FFB received (9 - 15 Oct 2019)	=	17,046	kg	X	1,259.81	=	21,474,721	FFB received (16 - 20 Oct 2019)	=	-	kg	X	1,283.24	=	-	Total	=	52,829	kg			=	66,879,316	Deduction			KUD deduction+ Idapertabun (20 kk)	=	17,133,074	Aspekpir Fund	=	26,415	Duty stamp		6,000	JIn Poros Plasma SKP.II (Rp.6/kg)	=	316,974	Total Deduction	=	17,482,463	Amount Received	=	49,396,853	Comply
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5.1.7	Weighing equipment is verified by an independent third party on a regular basis (this can be government).	<p>Weighbridge in Ukui II POM is verified by government agency in annual basis. Latest verification was performed on 28 October 2019, based on "Surat Keterangan Hasil Pemeriksaan" (calibration certificate):</p> <ul style="list-style-type: none"> - No.700/DPP/UPT.1.2/378/X/2019 for Avery Weigh Tronix; model E1205; S/N 163450129; capacity 50,000 kg; - No.700/DPP/UPT.1.2/379/X/2019 for Avery Weigh Tronix; model E1205; S/N 170350331; capacity 50,000 kg; <p>Certificates issued by "UPT Metrologi Legal – Dinas Perdagangan dan Perindustrian Kota Pekanbaru", valid until 26 October 2020.</p>	Comply																																																																																																								
5.1.8	The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the	Based on review of agreement, the company carried out the development and provide supervision in KUD (Scheme Smallholder). The company support KUD	Comply																																																																																																								

	smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material.	in form of supervision in upkeep, fertilizer application, harvesting, FFB transport and implementation of RSPO P&C requirements.	
5.1.9	(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.	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. The company has also provide channel to report if there is violation to the principles and objectives, through email whistleblow@rgei.com or phone (62) 81 2755 2528.	Comply
Criteria 5.2			
The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification.	PT IIS-UKUI Group always communicates with interested smallholders including women farmers to support their livelihoods especially those related to RSPO certification. Some of the company's activities that can be considered as supporting activities towards interested smallholders without, among them: <ul style="list-style-type: none"> - Training on limited pesticides was carried out on 19 June 2019 in the KUD Bakti, attended by 81 participants. - Training of weeding control on 19 July 2019 at KUD Sumber Makamur, Fertile Palm Oil, KUD Bina Sejahtera, KUD Sumber Bahagia, KUD Karya Tani, KUD Mekar Abadi and KUD Petani Subur attended by 65 participants - Training of balanced fertilizer of fertile palm oil, KUD Bina Sejahtera, KUD Sumber Bahagia, KUD Bukit Potalo, KUD Karya Tani, attended by 69 participants on 20 August 2019 and attended by 62 participants. Integrated Palm Oil Pest Control Training, KUD Bina Sejahtera, Sumber Bahagia KUD, KUD Bukit Potalo, KUD Karya Tani, attended by 53 participants on 21 October 2019.	Comply

5.2.2	The unit of certification develops and implements livelihood improvement programmes, including at least capacity building to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder).	<p>PT Inti Indosawit Subur – Ukui Group sets a scheme manager, with field assistant assigned for each cooperative to improve smallholder management, including productivity. Each year, company provisioned training program, aside from day-to-day operation monitoring by field assistant, e.g.:</p> <ul style="list-style-type: none"> - Training on limited pesticides was carried out on 19 June 2019 in the KUD Bakti, attended by 81 participants. - Training of weeding control on 19 July 2019 at KUD Sumber Makamur, Fertile Palm Oil, KUD Bina Sejahtera, KUD Sumber Bahagia, KUD Karya Tani, KUD Mekar Abadi and KUD Petani Subur attended by 65 participants - Training of balanced fertilizer of fertile palm oil, KUD Bina Sejahtera, KUD Sumber Bahagia, KUD Bukit Potalo, KUD Karya Tani, attended by 69 participants <p>Integrated Palm Oil Pest Control Training, KUD Bina Sejahtera, Sumber Bahagia KUD, KUD Bukit Potalo, KUD Karya Tani, attended by 69 participants</p>	Comply
<p>PROCEDURAL NOTE: The RSPO is currently developing a separate standard for Independent Smallholders.</p>			
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	<p>Ukui II Mill supplied by own estates (Soga and Sei Lala Estate) and smallholder from 6 <i>KUD's</i> with total 2,854 smallholders. Based on interview with smallholder representatives from <i>KUD Usaha Tani, Trani Maju and Mekar Abadi</i> obtain information that entire land has been granted by government (private land title/SHM).</p> <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</p>	Comply

		<p>handling and safety procedures. For example, each plot received 4 unit barn owl box to help them control rat population.</p> <p>During the audit, auditor also obtain information that PT. Inti Indosawit Subur are now assisting the smallholders on replanting project in collaborated with local government. This aims to ensure that farmers produce palm oil sustainably.</p>	
5.2.4	<p>(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.</p>	<p>Certificate holder has assign chemical weeding team (<i>Tim Unit Semprot/TUS</i>) in each estate/unit to handling chemical weeding activity. The team member originated from own workers (for own estate) and local communities (for smallholder). They regularly attended training on pesticide handling that conducted by the pesticide supplier in collaboration with local pesticide committee.</p> <p>Based on document review and interview with random pesticide applicator known that they were attending the last training on pesticide handling on 24 May 2019. Some topic 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 for them on how to 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>	Comply

<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>Annual review of progress of the smallholder support by Asian Agri's can be see and downloaded in Asian Agri's website https://www.asianagri.com/id/panel-keberlanjutan/laporankeberlanjutan. Those document are publicly available.</p> <p>Plasma manager (KLU) also described that PT Inti Indosawit Subur also helped the smallholder based on monthly management review of smallholder performance as follows:</p> <ul style="list-style-type: none"> • Assisted the <i>KUD's</i> to achieve the production and upkeep target. Until this audit, plasma area has been achieved 5% above the target. • Assisting the <i>KUD's</i> in replanting program. Until this audit, there is a record of approval by smallholder member in some <i>KUD's</i>. PT Inti Indosawit Subur as agreed to be bank guarantor for the financial scheme of replanting. <p>Based on field visit and interview with smallholder representatives, each <i>KUD's</i> has been supported in IPM program. They equipped with beneficial plant and barn owl box (4 unit each plot). Certificate holder also conducted training in order to ensure the smallholder's competency. For example:</p> <ol style="list-style-type: none"> a. Pesticide handling training on 24 May 2019 in Club House Ukui. Attended by 124 participants from chemical weeding team (<i>Tim Unit Semprot/TUS</i>) from own estates and <i>KUD's</i>. b. Harvesting training on 6 March 2019 in Club House Ukui. Attended by 69 participants from <i>KUD's</i>. c. First aid kit training on 20 April 2019 in Club House Ukui. Attended by 62 participants from <i>KUD's</i>. d. Basic fire training on 26 October 2019 in Club House Ukui. Attended by 114 participants from <i>KUD's</i>. e. Environmental Impact and High Conservation Value awareness training on 19 October 2019 in Club House Ukui. Attended by 50 participants from <i>KUD's</i>. 	<p>Comply</p>
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<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>			
6.1.1	<p>(C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.</p>	<p>The company (Ukui 2 Estate and Smallholder) has procedure, which regulated that hiring and promotion of workers are based on skill, work experiences, and job evaluation.</p> <p>Promotion and upgrade are based on employee appraisal conducted annually as outlined in the Employee Assessment Form signed by the employee concerned, approved by the line manager and checked by the General Manager. The form indicates that there is no indication of employment discrimination in terms of ethnicity, caste, religion, disability, gender, sexual orientation, union membership, political affiliation and/or age, for example:</p> <ul style="list-style-type: none"> a. Promotion Document of Mr. Endar Halomoan (upkeep) from status of PHL (casual worker) to SKU-H (permanent worker) according to HR Manager Letter No. 205/HR-RO2/MEMO/11/19 dated 11 November 2018. b. Promotion Document of Mr. Fredi Hasan (harvester) from status of PHL (casual worker) to SKU-H (permanent worker) in accordance with HR Manager Letter No. 210/HR-RO2/MEMO/11/19 dated 11 November 2018. <p>Based on interviews with several UKUI 2 Estate employees and document verification, that there is no discrimination against employees in the recruitment process and also the promotion of positions or the appointment of employees as permanent employees.</p> <p>The company determines minimum wages based on the Government regulation annually, the minimum wages in 2019 as regulated in "Surat Keputusan Gubernur Riau No. Kpts. 661/III/2019", dated 25/03/2019 for</p>	Comply

		Agriculture sector (Karet, Kelapa, Kelapa Sawit) and Mill in Province of Riau is IDR 2,820,000/month. Based on review of payments slip, there is no worker paid below minimum wages	
6.1.2	(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against. Evidence includes migrant workers' non-payment of recruitment fees.	<p>Promotion and upgrade are based on employee appraisal conducted annually as outlined in the Employee Assessment Form signed by the employee concerned, approved by the line manager and checked by the General Manager. The form indicates that there is no indication of employment discrimination in terms of ethnicity, caste, religion, disability, gender, sexual orientation, union membership, political affiliation and/or age, sample taken:</p> <p>Recruitment at UKUI 2 Mill, based on February to May 2019, including:</p> <ul style="list-style-type: none"> - Perjanjian Kerja Harian Lepas (Casual Workers) no. 001/PKHL/PUD/X/2019 dated 1 October 2019 on behalf of Mrs. Dwi Ninda Wahyuni (25 years old) for position: office administration. - Perjanjian Kerja Harian Lepas (Daily Workers) no. 002/PKHL/PUD/X/2019 dated 3 October 2019 on behalf of Mr. Irwansyah (27 years old) for position processing palm oil. 	Comply
6.1.3	The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.	<p>Promotion and upgrade are based on employee appraisal conducted annually as outlined in the Employee Assessment Form signed by the employee concerned, approved by the line manager and checked by the General Manager.</p> <p>The form indicates that there is no indication of employment discrimination in terms of ethnicity, caste, religion, disability, gender, sexual orientation, union membership, political affiliation and/or age, its seen on: Surat Perjanjian Kerja Harian Lepas pada Pasal 1; tentang Job type, weekday, duties and responsibilities and also medical fitness which performed by doctor on site clinic.</p>	Comply

		<p>Based on it, the implementation of the medical examination of prospective workers carried out above by the doctor clinic carried out on November 25, 2019.</p> <p>However, in the year 2019 period, there is no recruitment process done by ukui 2 estate.</p>	
6.1.4	<p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p>	<p>The company is regularly perform monitoring of pregnancy in monthly bases, for period July – November 2019, there were reported no workers in pregnant condition (negative detection) as many 41 female workers, e.g: Mrs. Santi, Mrs. Yani, Mrs. Neni Harepa, Mrs. Suriyani, Mrs. Lasriati, Mrs. Rasini, Mrs. Samini etc.</p> <p>From the results of this pregnancy check will make the basis for the type of work that is done, and if there is a female worker who is pregnant then is not allowed to work in relation to chemicals. .</p> <p>Smallholder-Ukui:</p> <p>Kebun Plasma Ukui has been performed monitoring and pregnancy testing every month and recorded on "Monitoring Pemeriksaan Kehamilan Untuk Pekerja atau Karyawan Semprot (TUS)". The latest performed on December 2019, there were reported no workers in pregnant condition (negative detection) as many 9 female workers: Ms. Kunik, Mrs. Selly, Mrs. Jumiah, Mrs. Sri Wahyuni, Mrs. Mayrianti, Mrs. Sari, Ms. Susi, Ms. Sitimas Kurroh and Ms. Lia.</p>	Comply
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>There is a gender committee, which have program to regularly meets in monthly basis, discussing general agenda and other issue related to handling sexual harassment and dissemination of sexual harassment prevention. The Gender Committee conduct monthly meeting to discuss issues which raised by members (if any), the last meeting of Gender Committee was conducted on 9 October 2019, there is no issues raised related gender, discrimination and/or</p>	Comply

		<p>harassment. The gender committee has understood the grievance mechanism as well as the protection of the identity of the complainant/whistle-blower. Implemented policy on prevention of sexual harassment and violence against women, the policy is prominently displayed on notice boards at the Mills and the Estates muster areas. Interviews of female staff, workers and union representatives confirmed that the company implemented the sexual harassment policy.</p> <p>Work program Gender Committee of PT IIS Ukui Group year 2019, these included:</p> <p>a. Special activities:</p> <ul style="list-style-type: none"> • women-do clean Friday – pembersihan pada hari Jumat • Posyandu activities (integrated services post for toddlers) • Healthy activities for employees mothers • Socialization related to sexual harassment and violence against the women <p>b. Communication with the management related company employees complaints (especially female employees):</p> <ul style="list-style-type: none"> • Routine meetings at least 1 times a year • Socialization associated with sexual abuse and rights employees perempuan <p>Smallholders Ukui:</p> <p>Plasma Ukui 1 has demonstrated the policy to prevent sexual harassment and violence against women in "Kebijakan ICS Group Manager" issued dated 16th January 2018, in chapter 11 was stated "Mencegah pelecehan seksual dan berbagai bentuk kekerasan terhadap perempuan serta melindungi hak hak reproduksinya (prevent sexual harassment and violence as well as protect reproductive rights for women)".</p> <p>The policy has communicated to all scheme smallholders member and displayed in publication board in each KUDs office. On period 2019 base on</p>	
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		interview with workers, there is no issues raised related gender, discrimination and/or harassment.	
6.1.6	There is evidence of equal pay for the same work scope.	The company proves that it guarantees that related to the wage is in accordance with the laws and regulations applicable to the scope of work that has been made. Based on interviews and verification documents, the company has adopted wages in accordance with regulations and legislation. (See: 6.2)	Comply
Criteria 6.2			
Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).			
6.2.1	(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages and explained to them in language they understand.	<p>The Company already has Collective Work Agreement (PKB) period 2018-2020 which has been approved by the Director General of Industrial Relations and Social Security of Workers through Decision Letter no. B.319/PHIJSK/X/2018 dated 26 October 2018 concerning Registration of "PKB Badan Kerjasama Perusahaan Perkebunan Sumatera (BKS-PPS)" with Central Board of Federasi Serikat Pekerja Pertanian dan Perkebunan - SPSI. PKB is binding for all SKU-H and SKU-B levels. The PKB is valid for 2 years and build in Indonesian language.</p> <p>The PKB document regulates provisions regarding working time, wage system, assistance for sick days, absenteeism, tour of external services, overtime work, and payment of allowances while in the hold of state equipment. PKB is also provisions regarding premiums, payment of holiday allowances and bonuses, guarantees Social and Social Assistance, Work Equipment and Occupational Safety, Acceptance, Transfer of Promotions and Layoffs, Provisions for motorized vehicles for workers and educators, Company and Worker Obligations, Manpower Settlement Methods and the Termination of Company Regulations.</p> <p>Article V (Wages) regulates:</p> <ul style="list-style-type: none"> - Wages 	Comply

		<ul style="list-style-type: none"> - Rice / Natura Supply Allowances - Provisions concerning who is entitled to receive a rice supply, and - Dependents of workers. <p>The company determines minimum wages based on the Government regulation annually, the minimum wages in 2019 as regulated in "Surat Keputusan Gubernur Riau No. Kpts. 661/III/2019", dated 25/03/2019 for Agriculture sector (Karet, Kelapa, Kelapa Sawit) and Mill in Province of Riau is IDR 2,820,000/month. Based on review of payments slip, there is no worker paid below minimum wages.</p>	
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, including work done by family members.</p>	<p>The PKB document regulates provisions regarding working time, wage system, assistance for sick days, absenteeism, tour of external services, overtime work, and payment of allowances while in the hold of state equipment. PKB is also provisions regarding premiums, payment of holiday allowances and bonuses, guarantees Social and Social Assistance, Work Equipment and Occupational Safety, Acceptance, Transfer of Promotions and Layoffs, Provisions for motorized vehicles for workers and educators, Company and Worker Obligations, Manpower Settlement Methods and the Termination of Company Regulations.</p> <p>Based on verification of documents and interviews with workers stated that each worker has a Work Agreement with companies made in Indonesian as a language understood by all ethnic groups in PT IIS -UKUI Group. The Work Agreement Letter regulates Position, validity period and expiration of employment agreement, Obligations of workers, Placement / Transfer / Transfer, Payroll, Treatment, Annual leave, Worker Guarantee, Termination of employment, termination of employment and others. The employment contract has explained the related period of agreement, wages and payment (IDR. 112,800 per day in accordance with the Governor's Decree on Wages in 2019), allowances (holidays and others), attachments related to disgraceful acts / actions; which explains related to discrimination, child labor, workers' code of ethics, sexual harassment and coercion, for example:</p>	Comply

		<ul style="list-style-type: none"> - Employment Contracts - Perjanjian Kerja Harian Lepas no. 002/PKHL/KSL/X/2019, dated 22 October 2019 on behalf of Vishen Laksana on position upkeep, valid until 22 October 2020. - Employment Contracts - Perjanjian Kerja Perjanjian Kerja Untuk Jangka Waktu Tertentu (PKWT) no. 006/KSL/SPK/VII/2019, dates 1 July 2019 on behalf of Elysabet for position upkeep, valid until 30 June 2020. <p>Ukui-2 Smallholder:</p> <p>Farmer members of Kebun Plasma Ukui were not directly conducted the spraying work and handle the pesticide/herbicide. Spraying works and pesticide handling was performed by PT Inti Indosawit Subur, hence the chemical was stored by PT Inti Indosawit Subur in Agrochemical storage. Noted that, no outbreak of pest at all the sample farmers' area. Spraying works performed by TUS team which provided by PT Inti Indosawit Subur according to:</p> <ul style="list-style-type: none"> - Letter of Cooperation Agreement for Procurement of TUS Plasma Ukui - Surat Perjanjian Kerjasama Pengadaan TUS Plasma Ukui No. 02/SPK/SPK-TUS/KLU/I/2019 dated 4 January 2019 between KUD Mekar Abadi and PT Inti Indosawit Subur - Letter of Cooperation Agreement for Procurement of TUS Plasma Ukui - Surat Perjanjian Kerjasama Pengadaan TUS Plasma Ukui No. 02/SPK/SPK-TUS/KLU/I/2019 dated 4 January 2019 between KUD Trani Maju and PT Inti Indosawit Subur - Fertilizer Work Agreement - Surat Kesepakatan Pekerja Pupuk no. 01 / DOK.Mekar Abadi / SK / XII / 2018 dated 27 December 2018 on behalf of all KUD Mekar Abadi plasma fertilizer workers (List of fertilizers attached to the contract as many as 50 people). The work agreement contract 	
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		<p>contains fertilizer wages of IDR 10,000 per sack, allowances and bonuses for using PPE. There is even a statement about child labor (Article 8): "the use of child labor is only allowed on family plantations" (not in accordance with Ukui Plasma policy 2).</p> <ul style="list-style-type: none"> - Harvest Work Agreemen - Surat Kesepakatan Kerja Panen, no. 020/Doc.Mekar Abadi/SK/XII/2015 dated 28 December 2018 on behalf of KUD Mekar Abadi harvester as many 50 hasvester with provisions for a wage of IDR150 per Kg. <p>Based on interviews with sample farmers, that payment of TUS wages is IDR 100,000 every month.</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>The PKB document regulates provisions regarding working time, wage system, assistance for sick days, absenteeism, tour of external services, overtime work, and payment of allowances while in the hold of state equipment. PKB is also provisions regarding premiums, payment of holiday allowances and bonuses, guarantees Social and Social Assistance, Work Equipment and Occupational Safety, Acceptance, Transfer of Promotions and Layoffs, Provisions for motorized vehicles for workers and educators, Company and Worker Obligations, Manpower Settlement Methods and the Termination of Company Regulations.</p> <p>Based on verification of documents and interviews with workers stated that each worker has a Work Agreement with companies made in Indonesian as a language understood by all ethnic groups in PT IIS -UKUI Group. The Work Agreement Letter regulates Position, validity period and expiration of employment agreement, Obligations of workers, Placement / Transfer / Transfer, Payroll, Treatment, Annual leave, Worker Guarantee, Termination of employment, termination of employment and others. The employment contract has explained the related period of agreement, wages and payment (IDR. 112,800 per day in accordance with the Governor's Decree on Wages in 2019), allowances (holidays and others), attachments related to disgraceful</p>	<p>Comply</p>

		<p>acts / actions; which explains related to discrimination, child labor, workers' code of ethics, sexual harassment and coercion.</p> <p>Based on the results of interviews with the management of Serikat Pekerja Pertanian dan Perkebunan-Serikat Pekerja Seluruh Indonesia (PUK-SPPSP-SPSI) and workers stated that the company has realized the normative employment obligations stipulated in the Joint Work Agreement.</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. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.</p>	<p>The company has prepared facilities for the workers, including the basic need such as electricity and water. Detail of company facilities for employees are as follows:</p> <p>PT Inti Indosawit Subur is providing adequate housing with electrical and clean water supply, medical clinic, sport facilities, religious facilities, education facilities and other amenities. Based on field inspection, the facilities found to be in good condition. The company has prepared facilities for their workers.</p> <p>Record seen:</p> <p>Data dan Layout of Public Facilities in Soga Estate – year 2019, such as:</p> <ul style="list-style-type: none"> - Housing: staff (9 units), type D (18 units), Type E for workers (148 units), type E1 for workers (166 units), type E2 for workers (84 units and type long house (58 units) - Mosque (4 units), - Church (1 unit) - Community hall (1 unit), - Kindergarden (1 units) - Sport facilities, (football, badminton and volley ball) - School bus (4 units), - Policlinic (2 units) <p>The company provides electricity and clean water (MCK) for its employees. Electricity services are provided in the form of PLN electricity.</p>	<p>Comply</p>

		The company always inspects employee housing, for example: on December 3, 2019 in housing in Soga Estate and Padatangga; December 7, 2019 at the Sei Lala Estate estate. Housing changes include: water and sanitation, houses (roofs, windows, doors, floors and bathrooms), garbage disposal / household sewage and environmental / hazardous organism conditions.	
6.2.5	The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.	<p>Company is able to demonstrate effort in providing access to adequate, sufficient and affordable food: provision of rice allowance – aside from monthly salary to all eligible workers, cooperative organization for employee providing basic food necessities (Waserda Koperasi Karya Bersama). Company is also accommodating weekly market for each estate; Sunday for Ukui Estate.</p> <p>Ukui-2 Smallholder:</p> <p>The farmer member villages are a developed Transmigration Village. Provision of food can be obtained from existing markets in the village. Based on the results of field visits to the sample villages indicate that in the village was available weekly markets and stalls that provide basic necessities.</p>	Comply
6.2.6	A DLW is paid to all workers, including those on piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.	<p>The company determines minimum wages based on the Government regulation annually, the minimum wages in 2019 as regulated in "Surat Keputusan Gubernur Riau No. Kpts. Kpts.661/III/2019", dated 25/03/2019 for Agriculture sector in Pelalawan Regency is IDR 2,820,000/month. Based on review of payments slip, there is no worker paid below minimum wages.</p> <p>Based on Memorandum no. 012/HR-AAS/MEMO/05/19 dated 2 May 2019, the company has determined daily wages for PHL workers to be IDR 112,800/manday or IDR 2,820,000/month and SKU-H workers to be IDR 2,679,000/Month plus rice allowances as IDR 8,000 per Kg. This value does not include Rice Allowance as stipulated in PKB that it is part of basic wage.</p> <p>In general, the UKUI Group including smallholders have calculated the Decent Living Needs using the calculation method as set out in the "RSPO Guidance for Implementing a Decent Living Wage", June 1, 2019. The company has</p>	Comply

		<p>conducted an account of the DLW for the 2018 period with data drawn from each -each estate 8 and POM.</p> <p>Based on the verification of documents the results of the 2018 DLW calculation shows that:</p> <p><u>Employees of Inti:</u></p> <ul style="list-style-type: none"> • Total Living Basket : IDR 2,335,521,- • Net Living Wage : IDR 2,335,521 • Total Mandatory deduction : IDR. 106,033,- • Gross Living Wage : IDR. 2,441,553,- • Prevailing Wage : IDR. 2,820,000,- • Living Wage Gap : + IDR 318,447,- (Positif) <p><u>Employees of Smallholder:</u></p> <ul style="list-style-type: none"> • Total Living Basket : IDR 2,335,521,- • Net Living Wage : IDR 2,335,521 • Total Mandatory deduction : IDR. 106,033,- • Gross Living Wage : IDR. 2,441,553,- • Prevailing Wage : IDR. 2,820,000,- • Living Wage Gap : + IDR 318,447,- (Positif) <p><u>Employees of KUD:</u></p> <ul style="list-style-type: none"> • Total Living Basket : IDR 4,305,,102,- • Net Living Wage : IDR 3,874,592,- • Total Mandatory deduction : IDR 195,452,- • Gross Living Wage : IDR. 4,070,044,- • Prevailing Wage : IDR. 2,820,000,- • Living Wage Gap : - IDR 1,250,044,- (Negatif) 	
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		<p>Piece rate / qoutas calculation has been calculated based on the achievement of 7 working hours in accordance with applicable regulations (UU No. 13/2003), for example:</p> <p>Calculation of labor harvest in Plasma:</p> <ul style="list-style-type: none"> - Ability to harvest power for 7 hours per day: 3,000 kg - Harvest area: 4 hectares - Job performance in 1 hour 429 kg / hour - Basic wages Based on the provisions of Prov. Riau: IDR. 112,800 per day - Price of harvest: IDR. 38 / kg - Price per hectare: IDR. 28,200 per Ha - Actual Harvest Costs (currently in effect): IDR 150 / Kg - There is a gap of: 299% positive. <p>Calculation of fertilizer labor piece rate:</p> <ul style="list-style-type: none"> - The ability to sow fertilizer for 7: 600 kg - Tonnage per hour: 86 Kg / hour - Basic wages Based on the provisions of Prov. Riau: IDR. 112,800 per day - Fertilizer wages: IDR. 188 / Kg - Actual fertilization wages (valid now): IDR. 200 / kg <p>There is a gap of: 6% positive.</p>	
<p>PROCEDURAL NOTE:</p>			

The RSPO Labour Task Force will prepare guidance on the DLW implementation, including details on how to calculate a DLW, expected for 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist.

<p>6.2.7</p>	<p>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.</p>	<p>Based on the verification of labor documents period shows that PT IIS - Ukui Group still has casual daily laborers and PKWT, however, the main types of work such as fertilizer harvesting and production, while some types of jobs that are seasonal and limited work are carried out by Freelance and Daily Workers PKWT (certain time workers). PT IIS-Ukui Group in the present period has Replanting work which is mostly done by temporary workers (BHL and PKWT).</p> <p>Non conformity (minor):</p> <p>Based on the employee data of UKUI II Sei Lala Estate period November 2019, there are harvest and load FFB employees, which is the main activity in oil palm plantations as many as 95 workers and has not been appointed as permanent employees.</p> <p>Objective evidence:</p> <p>Based on the employee data of Ukui 1 Estate period November 2019, that there are 119 harvest and load FFB employees who have not carried out the appointment as permanent employees, although there are submissions from PHL to PKWT as much as 28 workers (23.5%) by email to Regional Head Plantation II.</p>	<p>Minor nonconformance</p>
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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>	<p>(C) A published statement recognising 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>PT Inti Indosawit Subur – Ukui Group has company policy signed by Managing Director on 01/12/2014. The policy stated company guarantee freedom of association or be part of worker union as well as collective bargaining.</p> <p>There is a worker union for Ukui Estate and Ukui 2 POM named “Pengurus Unit Kerja (PUK) Serikat Pekerja Pertanian dan Perkebunan-Serikat Pekerja Seluruh Indonesia (PUK-SPPP-SPSI) PT Inti Indosawit Subur Kebun Ukui dan Pabrik Ukui Satu” as per “Surat Keputusan Pengurus Cabang Federasi SPPP-SPSI Kabupaten Pelalawan No.Kep. 17-A/PC-FSP.PP/K-SPSI/PLLW/10/2017” dated 15 October 2017 and valid for 5 years.</p> <p>Organization Structure of Pengurus Unit Kerja (PUK) Serikat Pekerja Pertanian dan Perkebunan (SPPP)- Serikat Pekerja Seluruh Indonesia (SPSI) PT Inti Indosawit Subur Kebun Ukui is as follows:</p> <ul style="list-style-type: none"> - Chairman : Zainal A Bangun - Vice Chairman : Rahmad : Sumardi - Secretary : M. Yunus - Vice Secretary : Watri Efendi <p>PT IIS-Ukui Group workers union has been registered in Dinas Tenaga Kerja (Manpower Agency) of Pelalawan Regency on 7 December 2006 as mentioned in “Tanda Bukti Pencatatan Serikat Pekerja” No. 004/Disnaker/ PEN/SPPP-SPSI/2006 named PUK-SPPP-SPSI PT Inti Indosawit Subur Kebun Ukui.</p> <p>Ukui-2 Smallholder:</p> <p>Based on the results of interviews with farmer members, indicates that they have understood the policy published by the Smallholder Manager dated 16 January 2019 wherein it also concerns the policy of freedom of association.</p>	<p>Comply</p>
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		Based on document verification as well as interviews with harvest laborers, they have not been willing to establish worker unions until now.	
6.3.2	Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages and made available upon request.	<p>SPSI meeting with management, including:</p> <ol style="list-style-type: none"> 1. The meeting between SPSI and the Management of PT IIS on 2 July 2019, there were several discussions, including: <ul style="list-style-type: none"> - Transparency of harvest quality assessment - Yet consistent SIM-making budget help - Residential Hygiene and housing fogging schedule 2. Minutes of the meeting for the meeting on 7 February 2019, a meeting to discuss related: <ul style="list-style-type: none"> - Work equipment for workers (created rules related to employee work tools). - Socialization regarding employee bonuses. - Socialization of sanitation and handling of waste in housing. 	Comply
6.3.3	Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.	<p>PT Inti Indosawit Subur – Ukui Group has company policy signed by Managing Director on 01/12/2014. The policy stated company guarantee freedom of association or be part of worker union as well as collective bargaining.</p> <p>Based on the interview with the manager of the parent trade union as well as Estate Coordinator (Mr. Zainal Arifin Bangun and Mr. Rahmad), the management does not intervene in the formation/the establishment of a union manager, but the facility/office is indeed provided. Management also provides allowance to the workers ' Union officers to hold events related to the unions organization e.g. permission to hold board meetings, electing admins etc. PT IIS-UKUI Group has been established bipartite Cooperation Institute (LKS) and meeting with management once a month.</p>	Comply
<p>Criteria 6.4: Children are not employed or exploited.</p>			

6.4.1	A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.	<p>The company has own policy signed by management on 01/12/2014 that stated: It is not allowed all children to work in every activities/processes in the company.</p> <p>Samples of contract of employment agreement of Kontrak Perjanjian Kerja Pengangkutan Janjangan Kosong Kelapa Sawit, no. 059/E2/KSL/V/19 dated 30 April 2019 on behalf of Nuryati, it stat on Article 9 regarding Tanggung jawab; <i>"Tidak mempekerjakan anak di bawah umur yang dilarang oleh peraturan perundangan"</i>.</p>	Comply
6.4.2	(C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.	<p>The company has own policy signed by management on 01/12/2014 that stated: It is not allowed all children to work in every activities/processes in the company, taken an sample on period November 2018 as bellow:</p> <p>Soga Estate (KSA):</p> <p>Verification of KSA Estate employee data period November 2019, shows that no indication of worker with age below 18 years old during recruitment or at the present time. Sample verified:</p> <ul style="list-style-type: none"> a. Yudha Pasyu H. (PHL), birthdate on 31 March 2000, recruited in PT IIS-KSA Estate on 1 January 2019 (18 years and 9 month). b. Muhammad Fadly (PHL), birthdate on 16 July 2019, recruited in PT IIS-KSA Estate on 1 November 2019 (19 years and 4 month). <p>Sei Lala Estate (KSL):</p> <p>Verification of KSL Estate employee data period November 2019, shows that no indication of worker with age below 18 years old during recruitment or at the present time. Sample verified:</p> <ul style="list-style-type: none"> a. Ardiansyah (PHL), birthdate on 23 August 1998, recruited in PT IIS-KSL Estate on 1 January 2019 (20 years and 4 month). 	Comply

		<p>b. Vishen Laksana (PHL) birthdate on 3 August 2000, recruited as PT IIS-KSL Estate employee on 16 October 2019 (19 years and 3 month).</p> <p>Ukui 2 Smallholder:</p> <p>Based on the results of interviews with farmer members indicates that they have understood the policy published by the Smallholder Manager dated 16 January 2017 which in it also concerns the prohibition to employ children under age in palm oil plant operations.</p> <p>Based on field visit and interview with harvester, shows that no indication of using child labor or worker under 18 years old. Taken sample from workers list period November 2019 as bellow:</p> <ul style="list-style-type: none"> - Lamijo (PHL), birthdate 7 May 1968, recruited in PT IIS Ukui-Plasma employee on 15 August 1989 (21 years and 3 month). <p>Jambiri (PHL) birthdate 4 September 1993, recruited as PT IIS-Ukui-Plasma employee on 1 May 2014 (20 years and 8 month).</p>	
6.4.3	<p>(C) Young persons may be employed only for non-hazardous work, with protective restrictions in place for that work.</p>	<p>As described on 6.4.1 indicators, that the company has own policy signed by management on 01/12/2014 that states: It is not allowed all children to work in every activities/processes in the company.</p> <p>Based on employment document verification period in October 2019 in each estate and mill indicates that there was no worker who was less than 18 years sebagai labor, as they arrive here's an employee who has the youngest age up to a period of November 2019, for example</p> <p>Soga Estate, Seli Lala Estate and Ukui 2 Mill:</p> <ul style="list-style-type: none"> a. Yudha Pasyu H. (PHL), birthdate on 31 March 2000, recruited in PT IIS-KSA Estate on 1 January 2019 (18 years and 9 month). 	Comply

		<p>b. Muhammad Fadly (PHL), birthdate on 16 July 2019, recruited in PT IIS-KSA Estate on 1 November 2019 (19 years and 4 month).</p> <p>c. Ardiansyah (PHL), birthdate on 23 August 1998, recruited in PT IIS-KSL Estate on 1 January 2019 (20 years and 4 month).</p> <p>d. Vishen Laksana (PHL) birthdate on 3 August 2000, recruited as PT IIS-KSL Estate employee on 16 October 2019 (19 years and 3 month).</p> <p>Ukui 2 Smallholder:</p> <ul style="list-style-type: none"> - Lamijo (PHL), birthdate 7 May 1968, recruited in PT IIS Ukui-Plasma employee on 15 August 1989 (21 years and 3 month). - Jambiri (PHL) birthdate 4 September 1993, recruited as PT IIS-Ukui-Plasma employee on 1 May 2014 (20 years and 8 month). 	
6.4.4	<p>The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.</p>	<p>UKUI 2-Inti and smallholder Ukui 2:</p> <p>Based on interviews with contractors, officers of unions, the farmers group as well as officers in the field indicates that they have understood management policy to prohibit the use of the child labor in all types of the company's operations activities.</p> <p>Based on the verification document shows that the management have done socialization ban on the use of child labor policy through:</p> <ol style="list-style-type: none"> 1. Put up the policy in the bulletin board in every office/mill estate 2. Do direct socialization to workers especially vulnerable types of workers who are utilizing "informal worker" who are children like at the harvesting (harvesting) that is prohibited include the sons of workers to help her parents work (picing the lose fruit). 3. Lists the prohibition clause on each contract with contractors power the use of child documents. 	Comply

Criteria 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.	<p>PT Inti Indosawit Subur – Ukui Group has established a policy to protect the reproductive rights as it is found in Company Policy that’s signed by Managing Director, dated 01st December 2014 and on one part of the policies stated that: <i>"Mencegah pelecehan seksual dan berbagai bentuk kekerasan terhadap perempuan serta melindungi hak-hak reproduksinya (To prevent any sexual or physical abuses happen to women as well as to protect their reproductive rights)"</i>. There is a gender committee actively meets and discussing general agenda and other issue related to handling sexual harassment, dissemination of sexual harassment prevention.</p> <p>Implemented policy on prevention of sexual harassment and violence against women, the policy is prominently displayed on notice boards at the Mills and the Estates muster areas. Interviews of female staff, workers and union representatives confirmed that the company implemented the sexual harassment policy.</p> <p>Smallholders Ukui Group:</p> <p>Plasma Ukui Group has demonstrated the policy to prevent sexual harassment and violence against women in "Kebijakan ICS Group Manager" issued dated 16th January 2018, in chapter 11 was stated "Mencegah pelecehan seksual dan berbagai bentuk kekerasan terhadap perempuan serta melindungi hak hak reproduksinya (prevent sexual harassment and violence as well as protect reproductive rights for women)".</p> <p>The policy has communicated to all scheme smallholders member and displayed in publication board in each KUDs office.</p>	Comply

		<p>Sosialisasi kebijakan dated 6th October 2018 was attended by spaying team, e.g: Mrs Siti Atikah, Mrs Siti Aisyah, Mrs Siti Suryani, Mrs Haerani, etc.</p>	
<p>6.5.2</p>	<p>(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.</p>	<p>PT Inti Indosawit Subur – Ukui Group has established a policy to protect the reproductive rights as it is found in Company Policy that’s signed by Managing Director, dated 01st December 2014 and on one part of the policies stated that: <i>"Mencegah pelecehan seksual dan berbagai bentuk kekerasan terhadap perempuan serta melindungi hak-hak reproduksinya (To prevent any sexual or physical abuses happen to women as well as to protect their reproductive rights)"</i>.</p> <p>There is a gender committee actively meets and discussing general agenda and other issue related to handling sexual harassment, dissemination of sexual harassment prevention.</p> <p>Implemented policy on prevention of sexual harassment and violence against women, the policy is prominently displayed on notice boards at the Mills and the Estates muster areas. Interviews of female staff, workers and union representatives confirmed that the company implemented the sexual harassment policy.</p> <p>The company is regularly perform monitoring of pregnancy in monthly bases, for period July – November 2019, there were reported no workers in pregnant condition (negative detection) as many 41 female workers, e.g: Mrs. Santi, Mrs. Yani, Mrs. Neni Harepa, Mrs. Suriyani, Mrs. Lasriati, Mrs. Rasini, Mrs. Samini etc.</p> <p>Ukui-2 Smallholders:</p> <p>Plasma Ukui 2 has demonstrated the policy to prevent sexual harassment and violence against women in "Kebijakan ICS Group Manager" issued dated 16th January 2018, in chapter 11 was stated "Mencegah pelecehan seksual dan</p>	<p>Comply</p>

		<p>berbagai bentuk kekerasan terhadap perempuan serta melindungi hak hak reproduksinya (prevent sexual harassment and violence as well as protect reproductive rights for women)".</p> <p>The policy has communicated to all scheme smallholders member and displayed in publication board in each KUDs office.</p> <p>Socialisation of policy has performed on 6th October 2018 and attended by spaying team, e.g: Ms. Kunik, Mrs. Selly, Mrs. Jumiah, Mrs. Sri Wahyuni, Mrs. Mayrianti, Mrs. Sari, Ms. Susi, Ms. Sitimas Kurroh and Ms. Lia.</p>	
6.5.3	Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.	<p>For breastfeeding mothers and had children under 5 years, the company has provided child care (TPA) which is located in each division/Afdeling. In landfill space as well as the company provides a special space and time for 1 hour for breastfeeding mothers in need time to nursing his baby.</p>	Comply
6.5.4	A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.	<p>PT Inti Indosawit Subur – Ukui Group has prepared procedure on a specific grievance mechanism which respects anonymity of complainants under Standard Operating Procedure, No. SOP:-HR-308.5-RO; Revision:0, 11/12/2009: Employees complaints: Submission and settlement.</p> <p>Mechanism for complaints management where it needs to protect its confidentiality for complaint submitter was found in company policy's draft as in one of points of this policies stated that: "to provide appropriate information for those who inquiry it and to proted its confidentiality for whistleblower cases in accordance to law regarding environmental and social issue, food safety, health and safety work, so that it enables them to more participate to the decision making processes for improving company's performance.</p> <p>Record of complaint/specific grievance has demonstrated under "Buku Keluhan Karyawan", e.g: in Afdeling III Sei Lala Estate there were 10 complaints/grievances recorded and each recommendation responses has been followed up, for example:</p>	Comply

		<ul style="list-style-type: none"> - Complaint on 10 October 2019 from employee namely Hadirat Zega, related damage to the door and window glass, this complaint has followed up on 15 October 2019. - Complaint on 24 October 2019 from employee namely Patut Harahap, related damage to kitchen doors, this complaint has followed up on 18 November 2019. - Complaint on 12 December 2019 from employee namely Fatimano, related damage to the zinc roof, this complaint has followed up on 14 December 2019. <p>Ukui Smallholders:</p> <p>The scheme smallholders have mechanism of consultation and communication in "Mekanisme komunikasi, konsultasi dan keluhan Kebun Plasma Ukui Group", dated 16th January 2018.</p> <p>Based on log book of record in the form of "Penerimaan Keluhan dan Tanggapan". On 2019 period, there was no grievance reported, all of complaints has been followed and recorded.</p>	
<p>Criteria 6.6: No forms of forced or trafficked labour are used.</p>			
6.6.1	<p>C) All work is voluntary and following are prohibited:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports • Payment of recruitment fees • Contract substitution • Involuntary overtime • Lack of freedom of workers to resign • Penalty for termination of employment • Debt bondage 	<p>Based on the interview with workers as well as the officers of the unions stated that there was no indication companies both of Inti and smallholder at Ukui 2 Group to do practices:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports • Payment of recruitment fees • Contract substitution • Involuntary overtime • Lack of freedom of workers to resign 	Comply

	<ul style="list-style-type: none"> Withholding of wages 	<ul style="list-style-type: none"> Penalty for termination of employment Debt bondage Withholding of wages 	
6.6.2	<p>(C) Where temporary or migrant workers are employed, a specific labour policy and procedures are established and implemented.</p>	<p>Based on employment document verification period indicates that there is no daily labor status off in pt agromuko and pt mmas. The rest of the core workers already have a certain time worker status (PKWT/Temporary workers) and permanent labor (SKUs-H and SKUs-B). Gradually has done the appointment of the status of PKWT be permanent labor (SKUs-h).</p> <p>For these kinds of wholesale work pt agromuko in collaboration with the provider of local labor services to do seasonal work like replanting.</p>	Comply
<p>Criteria 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.</p>			
6.7.1	<p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p>	<p>UKUI-2 POM:</p> <p>Ukui II POM have the health and safety committee structure. The committee acknowledge by government "Keputusan Kepala Dinas Tenaga Kerja dan Transmigrasi Provinsi Riau No.148/Disnakertrans-PK/SK-P2K3/VII/2018 tentang Pengesahan Panitia Pembina Keselamatan dan Kesehatan Kerja (P2K3) PT. Inti Indosawit Subur, PMKS Ukui-2" dated 23 July 2018.</p> <p>The safety officer have been trained and certified "Sertifikat Pembinaan Pengawasan Norma Keselamatan dan Kesehatan Kerja Ahli Keselamatan dan Kesehatan Kerja atas nama Risbet Sipayung No.Ser.16.7025/AK3/U/XI/2016" dated 21 November 2016. License "Kartu Tanda Kewenangan Ahli K3 No.Reg.34805/PK3/Ak/14/2016/P0 atas nama Risbet Sipayung" valid through 21 November 2019. Appointment of safety officer acknowledge by government "Keputusan Menteri Ketenagakerjaan RI No.KEP.7189/NAKER-BINWASK3/XI/2016 tentang Penunjukan Ahli Keselamatan dan Kesehatan</p>	Comply

		<p>Kerja Umum atas nama Risbet Sipayung” dated 21 November 2016, valid for 3 years.</p> <p>Since October 2019, there is an organisation structure changing at Ukui II POM. Mill manager as chief of P2K3 and OHS expert as Secretary of P2K3 has mutation to other mill. There is a changing of P2K3 organisation since mill organization has been restructurized on November 2019. Ukui II POM has propose the organization changing of P2K3 to Disnakertrans Kab. Pelalawan in the beginning of December 2019. The approval of P2K3 Ukui II POM still under process at Disnakertrans (Manpower office) Kab. Pelalawan.</p> <p>Safety committee meeting on monthly basis: 19 January 2019, 12 February 2019, 18 March 2019, 13 April 2019, 11 May 2019, 17 June 2019, 13 July 2019, 10 August 2019, 9 September 2019. The meeting attended by management, supervisor and workers. Minutes of meeting and attendance list evident, as reported to government (Dinas Tenaga Kerja dan Transmigrasi Provinsi Riau) on 8 April 10 July and 3 October 2019.</p> <p>SOGA ESTATE:</p> <p>Soga Estate have the health and safety committee structure. The committee acknowledge by government “Keputusan Kepala Dinas Tenaga Kerja dan Transmigrasi Provinsi Riau No.147/Disnakertrans.PK/VII/2018 tentang Pengesahan Panitia Pembina Keselamatan dan Kesehatan Kerja (P2K3) PT. Inti Indosawit Subur, Kebun Soga” dated 23 July 2018.</p> <p>The safety officer have been trained and certified “Sertifikat Pembinaan Pengawasan Norma Keselamatan dan Kesehatan Kerja Ahli Keselamatan dan Kesehatan Kerja atas nama Juliver Samosir No.Ser.17.9890/AK3/U/XI/2017” dated 17 November 2017. License “Kartu Tanda Kewenangan Ahli K3 No.Reg.45481/PK3/AJ/14/2017/PO atas nama Juliver Samosir” valid through</p>	
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		<p>17 November 2020. Appointment of safety officer acknowledge by government "Keputusan Menteri Ketenagakerjaan RI No.KEP.9489/NAKER-BINWASK3/XI/2017 tentang Penunjukan Ahli Keselamatan dan Kesehatan Kerja Umum atas nama Juliver Samosir" dated 24 November 2017, valid for 3 years.</p> <p>Safety committee meeting on monthly basis has been done: 15 January 2019, 11 February 2019, 25 March 2019, 15 April 2019, 18 May 2019, 25 June 2019, 26 Juli 2019, 19 August 2019, 13 September 2019. The meeting attended by management, supervisor, mandores and workers. Minutes of meeting and attendance list evident, as reported to government (Dinas Tenaga Kerja dan Transmigrasi Provinsi Riau). Latest meeting was helld on 27 November 2019.</p> <p>Sei Lala Estate:</p> <p>Sei Lala Estate has P2K3 structure, however the P2K3 organisation has not been register and approved by Disnakertrans Pelalawan Regency. Curently Safety Committee (P2K3) of Sei Lala was still under supervise of P2K3 Soga Estate. Sei Lala Estate was separate from Soga Estste since September 2019.</p> <p>Safety Committee meeting on monthly basis has been done on January – September 2019. Report of P2K3 meeting can be demonstrated during audit. Issue regarding OHS were discussed during safety committee meeting and recorded in "Laporan Triwulan P2K3".</p> <p>Scheme Smallholder:</p> <p>Each KUD has appoint the PIC to manage and monitor the OHS implementation as per "Surat Keputusan Penunjukan/Pengangkatan Petrugas Yang Bertanggung Jawab Untuk Pengawasan Kegiatan Kesehatan dan Keselamatan Kerja". Sample seen:</p> <ul style="list-style-type: none"> - Surat Keputusan Pengurus KUD Mekar Abadi Desa Tasik Juang, Kecamatan Lubuk Batu Jaya Nomor: 001/KUD-MA/SKPPK3/TJ/I/2018 Tentang 	
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6.7.2	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in the appropriate language of the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p>	<p>Ukui II POM & Estate:</p> <p>Emergency procedures has been established; for first aid and emergency situation under "Penanganan Keadaan Darurat – Pertolongan Pertama pada Kecelakaan No.AA-447-001-FM-R1" – December 2014.</p> <p>The team for emergency situation has been established – as part of safety committee. Ukui II POM, Soga Estate and Sei Lala are able to demonstrate adequate first aid officer, equipped with first aid kit.</p> <p>Emergency respons team for Soga Estate and Sei Lala Estate also has been formed to prevent and handle the emergency situation.</p> <p>Fire emergency simulation/drill for Soga Estate and Sei Lala Estate has been performed on 15 April 2019 at Soga Estate. Record of emergency drill were available in "Pengujian Kesiagaan Tanggap Darurat AA-820-002-FM".</p>	Comply

		<p>First aid officer for Ukui II POM and Soga Estate: Suryanto. License for Suryanto is certificate no. Ser.4744/PK3-P3K/X/2015 dated 22 October 2015 as "Pembinaan Keselamatan dan Kesehatan Kerja (K3) Bidang Pertolongan Pertama Pada Kecelakaan di tempat Kerja".</p> <p>Fire Emergency drill at Ukui II POM has been performed on 9 May 2019, attend by 17 crew from Ukui II POM. Minutes of drill and scenario were available.</p> <p>First aid training for field foreman also performed by Doctor Parulian. Training conducted on 28 November 2019 to foreman at Soga and Sei Lala Estate with participant 17 person. Evidence of training can be demonstrated as per "Attendant List Training PPGD" dated 28/11/2019.</p> <p>Scheme Smallholder: Guidelines on accident and emergency procedures are available as per "Rencana Tanggap Darurat" and disseminated to all group members. The emergency plan covers the cases of first aid for accident, agrochemical intoxication/exposure, earthquake, flooding, landslide, fire break/forest fire and spillage. First aid kit are available in the field and kept by foreman/mandor. Regular training concerning OHS and emergency procedures has been provided by Ukui Smallholder Management.</p>	
6.7.3	<p>(C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide 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>Ukui II POM: PPE Provision for all workers at mill are demonstrated as per "Bukti Serah Terima Alat Pelindung Diri Pabrik Ukui II". Sample seen:</p> <ul style="list-style-type: none"> - Bukti Serah Terima APD Safety Shoes for workshop operator as much as 21 unit, dated 6 May 2019 and 27 October 2019. - Bukti Serah Terima APD safety shoes for Mill process workers on dated 27 October 2019 as much as 54 unit. <p>Safety shoes was provide twice a year for all process operator including mechanic. During interview with operator Ukui II POM confirmed that they receive safety shoes twice a year. Monitoring of PPE usage can be</p>	<p>Major nonconformance</p>

		<p>demonstrated on document "Monitoring penggunaan APD" period November 2019 for each station.</p> <p>Soga Estate & Sei Lala Estate: Personal protective equipment (PPE) for each workers according to their job function are provided freely by Estate management. Evidence of PPE provision can demonstrated as present in "Logbook Catatan Serah Terima APD". Sample seen: at Afdeling I Soga Estate on 18/11/2019 PPE provision AP Boots for TUS team 10 pcs, dated 06/12/2019 PPE porovision for TUS team consist of Aprpon 9 pcs, Rubber handgloves 9 pcs and Masker respiratory 9 pcs. PPE provision are based on hazard and risk identification for each works. For example, sprayer workers are provide PPE including: Aprpon, Rubber handgloves, Cotton Handgloves, Rubber boots, Safety glasses. During field audit on harvesting activity, spraying activity, workshop activity, storage activity and chemical handling activity at Soga Estate and Sei Lala Estate confirmed that the workers interviewed told that they receive the PPE from Estate management freely each year. There was also the mechanism if the PPE was broken before the schedule of PPE changing, the workers can request the changing of broken PPE. PPE usage inspection has been conducted by Estate management, sample seen: "Checklist APD semprot piringan Kebun Soga 2019". PPE check was performed daily. PPE usage monitoring at Sei Lala Estate as per "Daftar Pemeriksaan Alat Pelindung Diri" Period January – November 2019 can be demonstrated.</p> <p>Scheme Smallholder: Smallhoder management has provide the PPE freely for workers in KUD, including: Safety boots, Safety Helmet, Safety Goggles, Cover Egrek. Evident of PPE provision available in "Realisasi Pembelian Barang Dana Premium</p>	
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		<p>Sharing Kebun Plasma Ukui” and “Berita Acara Serah Terima APD”. Total PPE provide in 2019 by Plasma Management:</p> <ul style="list-style-type: none"> - Helmet: 919 pcs - Egrek cover: 360 pcs - AP Boot (Safety Boot): 410 - Safety glasses: 819 pcs - Safety Shoes for KUD official: 346 <p>Sample of PPE handover to KUD i.e:</p> <ul style="list-style-type: none"> - Berita Acara Serah Terima APD KUD Mekar Abadi dated 12 February 2019, handover PPE: Helmet 49 pcs, Egrek Cover 30 pcs, AP Boots for harvester 30 pcs, safety glasses for harvester 43 pcs. - Berita Acara Serah Terima APD KUD Trani Maju dated 26 February 2019, handover PPE: Helmet 75 pcs, Egrek Cover 30 pcs, AP Boots for harvester 30 pcs, safety glasses for harvester 45 pcs. - Berita Acara Serah Terima APD KUD Usaha Tani dated 26 February 2019, handover PPE: Helmet 102 pcs, Egrek Cover 30 pcs, AP Boots for harvester 30 pcs, safety glasses for harvester 90 pcs. <p>PPE monitoring was performed by KUD each month as per “Monitoring Alat Pelindung Diri Pekerjaan Panen”. Sample seen for KUD Usaha Tani, KUD Trani Maju and KUD Mekar Abadi for period January – November 2019. Based on monitoring result, all harvester are use the PPE properly and accordingly.</p> <p>During field visit, non conformance was found that workers not use appropriate PPE at workplace.</p> <ul style="list-style-type: none"> - Loading Ramp station Ukui II POM, found that driver and FFB loader were not use appropriate PPE at workplace. While, the safety regulation at Ukui II POM, all workers shall be use appropriate PPE at Mill area. 	
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		<ul style="list-style-type: none"> - Sterilizer operator Ukui-II POM not use appropriate PPE (safety shoes) at workplace. - KUD Mekar Abadi, sighted 2 FFB loader not use PPE during work. 	
6.7.4	<p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work-related incidents leading to injury or sickness are covered in accordance with national law or by the unit of certification where national law does not offer protection.</p>	<p>Ukui II POM: All workers at Ukui II POM has covered by accident and health insurance (BPJS Ketenagakerjaan and BPJS Kesehatan). Monthly fee for BPJS mainly was paid by company, workers deducted only 2% from the salary (according to government regulation). Sampel seen of BPJS payment period October 2019, BPJS paid for 3 casual workers and 105 p[ermanent workers. Record of payment on "Detail Data Iuran" dated 14/11/2019, transfer via Bank BRI. During interview with Ukui II POM workers, can be demonstrated that they has cover by accident and health insurance. In addition, company has provide the Clinic complete with doctor and paramedic at Sei Lala Estate for all workers freely.</p> <p>Soga Estate and Sei Lala Estate: All workers of Sei Lala Estate are provided with medical care and covered by accident insurance. All workers has register to BPJS Ketenagakerjaan as the insurance body for accident/fatality accident, death and retired/pension. Costs incurred from work-related incidents leading to injury or sickness are covered by BPJS Ketenagakerjaan. In addition, all workers also register as BPJS Kesehatan to cover the health insurance. Evidence of BPJS Ketenagakerjaan payment can be demonstrated as per "Rincian Iuran Tenaga Kerja BPJS Ketenagakerjaan PT Inti Indosawit Subur – Kebun Sei Lala", NPP No. 19055821, Payment period November 2019. Total permanent (SKU) workers paid for BPJS ketenagakerjaan was 171 person and casual worksers (PHL) was 274 person. Payment slip and record available as</p>	Comply

		<p>per "Detail Data Iuran BPJS Ketenagakerjaan PT IIS – Kebun Sei Lala" Paid via Bank BRI, Payment Code 331903***.</p> <p>BPJS payment Soga Estate period October 2019, BPJS paid for 413 workers. Record of payment on "Detail Data Iuran" dated 4/11/2019, transfer via Bank BRI, payment code 191100***.</p> <p>PT IIS – Sei Lala and Soga Estate also provide the Clinic in each estate completed with doctor, midwife and paramedic. All workers can access and have a clinic services for medical threatment freely both for permanent and casual workers. It was also confirmed during field visit to Poliklinik Sei Lala Estate, Midwife and paramedic told that the Poliklinik is provide for all workers and freely.</p>	
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	<p>Ukui II POM:</p> <p>Occupational injuries are recorded using Lost Time Accident (LTA) metrics as per "Form AA-SOP-HSE-12A". According to record of lost time accident, since January – November 2019 at Uku II POM detail of accident record are present below:</p> <ul style="list-style-type: none"> - Total Accident/Injury: 6 case (3 Medical Aid and 3 first aid) - Total Man power: 120 - Total Man Hour: 361,466 - Total Day Lost to accident/injury: 0 days - Lost Time Injury Frequency rate: 39 - Lost Time Injury Saverity Rate: 159 - Total Injury Frequency Rate: 69 <p>Soga Estate:</p> <p>Occupational injuries are recorded using Lost Time Accident (LTA) metrics as per "Form AA-SOP-HSE-12A". According to record of lost time accident, since</p>	Comply

		<p>January – November 2019 at Soga Estate detail of accident record are present below:</p> <ul style="list-style-type: none"> - Total Accident/Injury: 108 case (Medical Aid) - Total Man power: 490 - Total Man Hour: 1,562,194 - Total Day Lost to accident/injury: 249 days - Lost Time Injury Frequency rate: 39 - Lost Time Injury Saverity Rate: 159 - Total Injury Frequency Rate: 69 <p>Sei Lala Estate:</p> <p>Record of lost time accident, since January – November 2019 at Sei Lala Estate detail of accident record are present below:</p> <ul style="list-style-type: none"> - Total Accident/Injury: 52 case (Medical Aid & Medical Injury) - Total Man power: 497 - Total Man Hour: 1,645,750 - Total Day Lost to accident/injury: 0 days - Lost Time Injury Frequency rate: 4 - Lost Time Injury Saverity Rate: 0 - Total Injury Frequency Rate: 20 	
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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.

<p>7.1.1</p>	<p>(C) IPM plans are implemented and monitored to ensure effective pest control.</p>	<p>Own Estates</p> <p>According to the Agricultural Policy Manual SOP AA-APM-OP-1100.10. R6 <i>Pengendalian Hama dan Penyakit</i> (Pests & Disease Control), certificate holder has plan to implemented integrated pest management.</p> <p>According to the interview with pest control officer in Sei Lala Estate obtain information that management has had a schedule to regularly monitored pest attack (census) as follows:</p> <ul style="list-style-type: none"> • Census of caterpillar/bag worm by monthly basis. • Census of Ganoderma annually. • Census rat infestation by recap the record of sortation in loading ramp. • Census of Barn Owl Box occupation in three monthly basis. <p>The last census in Sei Lala Estate has been conducted in second week of November 2019. Result of census shows that pest attack still under control (below the economic threshold) which is 0,3 – 1,3% (limit 5%).</p> <p>Based on field visit in Soga and Sei Lala Estate sighted no outbreak found. Condition in the ground are under control and well monitored. Certificate holder has used beneficial plant such as <i>Turnera subulata</i> and <i>Antigonon leptosus</i> (planted along side of main/collection road) in order the gathered natural predator of caterpillar/bagworm.</p> <p>During the field visit, auditor also observe barn owl box in the ground. Estate manager informed that barn owl box has been installed with hectare covered 1:25 Ha (each owl box covered 25 Ha). The last monitoring on November 2019 show that 31 owl box in Afdeling I Sei Lala Estate are fully occupied. For example, barn owl box number 43 occupy by a pair of owl.</p>	<p>Comply</p>
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		<p>Scheme Smallholder:</p> <p>Based on field visit and interview with smallholder representatives from <i>KUD Usaha Tani, Trani Maju and KUD Mekar Abadi</i> obtain information that they has 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. They also installed barn owl 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 are in good condition and well maintained.</p>	
7.1.2	Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.	The company only uses natural predators namely <i>Tyto alba</i> and <i>Sycanus dichotomus</i> in pest control efforts. Both predators are not recorded in invasive species according to the information listed on the website www.cabi.org on in global invasive species database http://www.iucngisd.org/gisd/search.php .	Comply
7.1.3	There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities. [For NI to define process]	Based on document verification, interview and field observation obtained information that there is no record use of fire for pest control.	Comply
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>Based on the document verification and interview with management, obtain information that there is only pesticide usage for chemical weeding and pest control (if needed). Recommendation of pesticide used are refer to SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i> (Weed control) where explain the weeds type, weeding control methods and eradication, pesticide characteristic, and procedures of application (spraying volume, calibration, chemical weeding interval, target and sprayer maintenance).</p> <p>During the audit, found some pesticide list that usually used with active ingredients such as isopropyl amine glyphosate, fluoroksifir, methyl metsulfuron, triklofir, diuron, paraquat diklorida, diuron, lamda sihalotrin and dimetil amina. Certificate holder no longer using paraquat since 15 November 2019, according to the circular letter of Deputy Managing Director No. 008/DMD/MEMO/OCT/19 dated 22 October 2019.</p> <p>To reduce the human and environmental risk, there is some continuous action that has been implemented as follows:</p> <ul style="list-style-type: none"> • Set up the pesticide rotation. For example, chemical weeding rotation is 4 times a year where the rotation in immature and early mature more often than mature and old palm. • Using the ultralow volume nozzle to minimize water consumption and reduce the risk for environment. During the field visit to the pesticide store sighted the micron herbi system knapsack as example. • Conducted regularly training for pesticide applicator and equipped them with appropriate PPE's. • Delaying the pesticide if weed or pest is under control. According to the interview with estate manager obtain information that the pesticide

Comply

		<p>rotation can be delayed or reduced especially in mature or old palm where weeds/pest population are under control.</p> <ul style="list-style-type: none"> Minimalize contamination for pesticide applicator and their families by ensuring them to clean themselves before back home. 	
7.2.2	(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.	Certificate holder has showed the record of LD50 calculation in each unit based on amount of pesticide used. For example, Sei Lala Estate has calculate the LD50 of each pesticide in a monthly bases.	Comply
7.2.3	(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.	<p>Until this surveillance audit obtain information that there is no pesticide use for control pest attack. All of pesticide only using for weeding (herbicide).</p> <p>Based on interview with IPM supervisor and smallholder representatives known that no outbreak that causes pesticide usage.</p>	Comply
7.2.4	There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best	Based on document verification, interview and field observation obtained information that there is no prophylactic use of pesticides.	Comply
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 used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to:</p> <p>7.2.5a Judgment of the threat and verify why this is a major threat</p> <p>7.2.5b Why there is no other alternative which can be used</p>	<p>Based on goods in and goods out data in pesticide store, obtained information that the certificate holder used some kind of pesticide (different active ingredients). There is only <i>paraquat diklorida</i> that listed as WHO Class II (Moderately Hazardous). As described in this indicator, the company no longer using <i>paraquat diklorida</i> since November 2019.</p> <p>There is no use of other pesticide class 1A and 1B until the audit.</p> <p>According to IPM procedures, certificate holder always using biological approach in order to monitoring pest attack. For example, estate using <i>Tyto alba</i> to monitoring rat infestation than using rodenticide.</p>	Comply

		<p>To maintain ground condition especially weeding control, certificate holder has had a procedures SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i> (Weed Control). This procedures has set the specific pesticide in with minimum risk in accordance with the target.</p>	
	<p>7.2.5c Which process was applied to verify why there is no other less hazardous alternative</p>	<p>Certificate holder through Asian Agri’s Research and Development Department has examined some pesticide in specific target. The result of examination and 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 What is the process to limit the negative impacts of the application</p>	<p>SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i> (Weed Control) has set some procedures to reduce negative impact of the application as follows:</p> <ul style="list-style-type: none"> • 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>Certificate holder did not using pesticide to eradicated pest without the outbreak. If any census result shows the pest attack almost reach the economical threshold, they usually conducted campaign test using pesticide if needed.</p>	

		Chemical weeding activity has regularly set by management. For example, normally circle, path and collecting point weeding conducted 4 times a year in immature and mature area. It rotation can be reduced in line with the palm ages.	
7.2.6	(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.	<p>Certificate holder has assign chemical weeding team (<i>Tim Unit Semprot/TUS</i>) in each estate/unit to handling chemical weeding activity. The team member originated from own workers (for own estate) and local communities (for smallholder). They regularly attended training on pesticide handling that conducted by the pesticide supplier in collaboration with local pesticide committee.</p> <p>Based on document review and interview with random pesticide applicator known that they were attending the last training on pesticide handling on 24 May 2019. Some topic that discuss such as safety pesticide handling, national regulation related to pesticide, symbol and label awareness and emergency procedure if any contamination or poisonous. The worker can described purpose of PPE usage, attending regularly medical check and safety working procedures.</p> <p>During the audit, auditor also interviewed some smallholder representatives and obtain information that the company has provide training session for them on how to 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>	Comply
7.2.7	(C) Storage of all pesticides is in accordance with recognised best practices.	<p>Soga Estate & Sei Lala Estate:</p> <p>SOP for pesticide storage has been provided in SOP "Pengangkutan dan Penyimpanan Bahan Kimia AA-KL-02-EFP" dated 1 February 2008. Pesticides are stored in the determined area separated from fertiliser and other</p>	Comply

		<p>chemicals. Pesticides storage is provided in Divisions as well as in central storage. Agrochemicals storage is locked areas with limited access. The storage is ventilated. MSDS and hazard symbol label are provided nearby of pesticides. Emergency shower and eyewash are also provided to anticipate in case of an emergency of agrochemical handling. PPE for handling of pesticides are provided including boots, apron, safety glass, respiratory mask and hand gloves. The possible spill is managed. Secondary containment is provided around the pesticides storage area. Spill kit is also provided in the area.</p> <p>Storage of pesticides found to be in accordance with hazard identification and risk assessment and national guideline for limited pesticide use. Empty chemical containers had been used for mixing chemicals for spraying pesticides in the field.</p> <p>The management of waste material from empty pesticide container disposed through hazardous waste store as per procedure "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 obtain the license as per "Keputusan Kepala Badan Penanaman Modal dan Pelayanan Perizinan Terpadu Kabupaten pelalawan Nomor: KPTS.503/BPMP2T-PLY/18/2015 Tentang Izin pengelolaan Limbah Bahan Berbahaya dan Beraacun (B3) Untuk Kegiatan Penyimpanan Sementara Limbah B3 kepada PT Inti Indosawit Subur Ukui" dated 29 December 2015 valid until 29 December 2020. Storage keeper maintains the balance of incoming and outgoing hazardous waste. Hazardous wastes were sent to licensed contractor PT Indostar Cargo for appropriate disposal.</p> <p>Scheme Smallholder:</p> <p>Ukui Smallholder management has ensure that all agrochemical usage and chemical weeding including pest and disease management was performed by PT Inti Indosawit Subur. PT Inti Indosawit Subur has prepared the procedure for handling all pesticide containers, as per "Penanganan Limbah Bahan</p>	
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		<p>Berbahaya Beracun”, No AA-KL-06-EFP revision 06, dated 1 August 2015. Safe Work Procedure on chemical storage, mixing and disposal that covered PPE, safe working procedure, handling of chemical, storage, chemical mixing and the disposal.</p> <p>Storage of pesticides found to be in accordance with hazard identification and risk assessment and national guideline for limited pesticide use. Empty chemical containers had been used for mixing chemicals for spraying pesticides in the field.</p> <p>During interview and field visit in farmer plots at KUD Trani Maju, KUD Usaha Tani and KUD Mekar Abadi it was found that spraying worker using PPE appropriately. Pesticides applied is handled by Team TUS (Tim Unit Semprot) PT. IIS – Soga & Sei Lala Estate.</p>	
7.2.8	All pesticide containers are properly disposed of and/or handled responsibly if used for other purposes.	<p>Soga Estate & Sei Lala Estate:</p> <p>All pesticide container are disposed to Temporary hazardous waste storage according to “SOP Pengangkutan dan Penyimpanan Bahan Kimia AA-KL-02-EFP” dated 1 February 2008.</p> <p>Ex pesticide container from estate sent to TPS LB3 with note as per “Catatan Serah Terima Limbah B3”. Sample seen:</p> <ul style="list-style-type: none"> - “Catatan Serah Terima Limbah B3” No. TPS/KUK/582 dated 10 September 2019, item: Ex Pesticide container as much as 6 kg, Jerycan 6 kg, ex Drum Gramoxone 42 kg; Deliver by Rudi H and receipt by Junaidi (Operator TPS LB3). - “Catatan Serah Terima Limbah B3” No. TPS/KUK/566 dated 27 July 2019, item: Ex Pesticide container as much as 11 kg, Deliver by Rudi H and receipt by Junaidi (Operator TPS LB3). <p>During field visit to TPS LB3 (temporary hazardous waste storage) shown that all pesticide container are in place in the specific area completed with symbol and label. All pesticide container and other hazardous waste are store for</p>	Comply

		<p>maximum 6 month according to licence TPS LB3 and sent to licensed contractor PT Shalli Riau Lestari for appropriate disposal.</p> <p>Hazardous waste delivery were completed with Manifest as per "Dokumen Limbah B3 (Hazardous Waste Manifest)". Latest delivery of Hazardous waste including ex pesticide container was done on 9 October 2019. Record of hazardous waste manifest available in "Manifest Nomor AAO0014638" dated 09 October 2019, item: Used rgas, Ex pesticide container, volume: 736 kg, Vehicle No. BM 8431 JU, Transporter: PT Shali Riau Lestari, PIC: Sondang Hakim S.</p>	
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>Based on interview with auditee and field observation, there are no pesticides applied aerially in Soga Estate, Sei Lala Estate and Scheme Smallholder.</p>	Comply
7.2.10	<p>(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p>	<p>Ukui II POM:</p> <p>MCU for mill workers performed each year including blood check, rontgen thorax, spirometry and audiometri. Latest MCU performed on 12 December 2019 by Focus Clinical Laboratory Pekanbaru. Evidence of MCU test for period February 2018 (78 workers) are available. Document of MCU test result are available. MCU test result shown that all workers are normal.</p> <p>Soga & Sei Lala Estate:</p> <p>Medical check-up for pesticide operator including warehouse agrochemical operator and fertilizer operator are carried out each semester by PT IIS – Soga and Sei Lala Estate. Medical check-up was performed by Focus Clinical Laboratory cooperated wuth Klinik Asian Agri Sehat. Latest MCU for pesticide operator, warehouse agrochemical and fertilizer workers was done on 23/4/2019. The number of workers who has the medical examination was 119</p>	Comply

		workers at Sei Lala Estate consist of pesticide operator, fertilizer workers, agrochemical warehouse operator and foreman.	
7.2.11	(C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.	<p>Soga Estate & Sei Lala Estate:</p> <p>Pregnant test each month was carried out by paramedic clinic using test pack for female pesticide operators (spraying workers). Pregnant test was performed to ensure that there is no pregnant female workers who conduct the pesticide/herbicide spraying. Sample seen at Soga Estate, pregnant test as per "Monitoring Cek Kehamilan" Soga Estate and Sei Lala Estate shown that since January – November 2019 there is no female spraying workers who indicated pregnant.</p> <p>Estate has issued the Memorandum No. m287/ES-KSA/Memo/08/2015 dated 1 August 2015 which stated that according to regulation, Estate prohibit to utilize the pregnant female workers to conduct the pesticide/herbicide application.</p>	Comply
Criteria 7.3:			
Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.			
7.3.1	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.	<p>Ukui II POM & Estate:</p> <p>The company has developed hazardous waste management plan, including infectious waste from clinic. The hazardous waste collected in temporary storage and disposed off through licensed contractor/transporter. PT Inti Indosawit Subur – Ukui Group has a MoU with PT Shalli Riau Lestari for transporting and collecting hazardous waste and medical waste as per "Perjanjian Kerjasama Pengelolaan Limbah B3 No. 049/SRL-PKU/MOU/III/2019" dated 12/03/2019. Transporter also has cooperation with licenced contractor to processing hazardous waste, namely PT Wastec International (for medical waste), Non Ferindo Utama (for Used battery) and PT Prasadha Pamunah Limbah Industri (all hazardous waste except medical waste).</p>	Comply

		<p>Waste and pollution sources have been identified and documented, including used lubricant and filter, old battery, used laboratory chemical, clinical/medical waste, mill effluent, EFB, smoke, dust, fiber and shell, empty agrochemical container, boiler ash, scrap iron, used tires, waste water and domestic household refuse. Record of identification was presented in "Evaluasi Aspek Dampak Lingkungan EMS-431-003-LT" latest updated on Februari 2019 (Soga Estate & Sei Lala Estate) and March 2019 (Ukui II POM).</p> <p>Waste management in particular of hazardous waste was documented in "Neraca Limbah B3" which reported to Environmental Agency Office each quarter.</p> <p>The company started at the beginning this year to re-cycle anorganic waste where the company built the waste storage.</p> <p>Scheme Smallholder:</p> <p>Smallholder Manager Ukui Group has developed mechanism of domestic waste management. The mechanism has disseminated to all KUD, KT and member. Domestic waste management perform by segregating organic and inorganic waste. Organic waste used as composting and inorganic waste was selected by type of waste such as: paper and plastic waste collected and deliver to collector, glass and steel was collected and delivered to PT Inti Indosawit Subur waste storage and other inorganic waste deliver to final sanitary landfill.</p> <p>Ukui Smallholder has defined the procedure "Pengelolaan Kemasan Ex (Bekas) Pupuk di Kebun" No. 035/DOK/SOP/PT.IIS KLU-AA/2016 dated 2 December 2016. Socialization of procedure to smallholder has regularly delivered, latest socialization conducted on 19 October 2019 to all representative of KUD, WKWK, and KT.</p> <p>All ex fertilizer sack was prohibited to dispose in plantation and housing area. All the ex fertilizer sack usage must be identified and report to Ukui Smallholder</p>	
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		<p>Manager. Ex fertilizer sack were triple rinsed and reused as loosefruit sack and the innerbag plastic is deliver to collector.</p> <p>Smallholder manager has monitored the usage of ex fertilizer sack in Plasma Ukui each month. The monitoring record were evident in "Monitoring Penggunaan Bekas Karung Pupuk untuk Tempat Brondolan" period January – August 2019 (KUD Usaha Tani, KUD Trani Maju & KUD Mekar Abadi). All ex fertilizer sack at Plasma ukui are controlled and monitor to prevent the negative impact to environment.</p>	
7.3.2	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p>	<p>Ukui II POM & Estate:</p> <p>Waste material dispose according to company procedure. Below are the procedure to disposal of waste material:</p> <ul style="list-style-type: none"> - "SOP Penanganan Sampah Industri Non B3 AA-KL-05-EFP" dated 1 February 2008. The procedure stipulated the disposal of waste material non hazardous waste, covering: Ex chemical non hazardous waste, ex fertilizer sack, ex equipment, ex praepart, scrap, used polybag, used hose, empty bunch, fibre, shell, solid, ash. - "SOP Penanganan Limbah Bahan Berbahaya dan Beracun (Limbah B3) AA-KL-06-EFP, dated 22 April 2016. The procedure stipulated the hazardous waste handling according to national regulation and best practises. - "SOP Penanganan Limbah Medis AA-KL-07-EFP" dated 5 April 2017. Procedure stipulated the medical waste handling, treat as hazardous waste. - "SOP Penanganan Limbah Laboratorium AA-KL-11-EFP" dated 15 November 2008. Procedure stipulated the handling of waste generated from mill laboratory, mostly treat as hazardous waste. <p>Waste material dispose according to company procedure. Solid waste from Ukui II POM such as: Fiber and Shell are used as Boiler fuel, while liquid waste water are use as Land Application to the plantatiuon (as organic fertilizer). Hazardous waste handling by deliver to Ukui Estate Temporary hazardous waste. Hazardous waste delivery evident in "Catatan Serah Terima Limbah B3".</p>	<p>Comply</p>

		<p>Sample seen for hazardous handover from Ukui II POM at "Catatan Serah Terima Limbah B3 No. TPS/KUK/942 dated 23 March 2019", waste handover including:</p> <ul style="list-style-type: none"> - Kaleng cat (useg rags) 135 kg - Jerycan 24 kg - Used filter 15 kg - Used Battery 45 kg - Used oil 80 kg - Grease container 2 kg <p>Waste delivery as per Catatan Serah Terima Limbah B3 No. No. TPS/KUK/594 dated 8 October 2019 waste delivery including: Used oil 280 kg, Kaleng cat (used rags) 60 kg.</p> <p>Medical waste delivery from Sei Lala Estate to to Ukui Estate Temporary hazardous waste as recorded in : Berita Acara Serah Terima Limbah B3" dated 7 December 2019, medical waste handover including:</p> <ul style="list-style-type: none"> - Sduit 3 cc (10 pcs) - Infus bottle (2 pcs) - Infus set (2 set) - Ampul (4 pcs) - Cassa cotton (16 pcs) - Hand scon No. 7.5 (12 unit) - Naid 23 (15 pcs) <p>Medical waste delivery from Soga Estate to to Ukui Estate Temporary hazardous waste as recorded in : Berita Acara Serah Terima Limbah B3" dated 7 December 2019, medical waste handover including:</p> <ul style="list-style-type: none"> - Sduit 3 cc (13 pcs) - Sduit 5 cc (8 pcs) 	
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		<ul style="list-style-type: none"> - Infus bottle (9 pcs) - Ampul (9 pcs) - Cassa cotton (38 pcs) - Hand scon no. 7.5 (11 unit) - Nad hecting (3 pcs) <p>Domestic waste (anorganic waste) generated from emplacement (workers housing) were deliver to "Dinas Pasar dan Kebersihan Pasar". The waste was collect and transported by Dinas Kebersihan Pasar each month as per "Berita Acara Pengangkutan Sampah Rumah Tangga Karyawan Group Ukui ke Dinas Pasar dan Kebersihan Pasar Kecamatan Ukui". Sample seen for delivery period on October – December 2019 were evident.</p> <p>Scheme Smallholder:</p> <p>Ukui Smallholder has defined the procedure "Pengelolaan Kemasan Ex (Bekas) Pupuk di Kebun" No. 035/DOK/SOP/PT.IIS KLU-AA/2016 dated 2 December 2016. Socialization of procedure to smallholder has regularly delivered, latest socialization conducted on 19 October 2019 to all representative of KUD, WKWK, and KT.</p> <p>All ex fertilizer sack was prohibited to dispose in plantation and housing area. All the ex fertilizer sack usage must be identified and report to Ukui Smallholder Manager. Ex fertilizer sack were triple rinsed and reused as loosefruit sack and the innerbag plastic is deliver to collector.</p> <p>Smallholder manager has monitored the usage of ex fertilizer sack in Plasma Ukui each month. The monitoring record were evident in "Monitoring Penggunaan Bekas Karung Pupuk untuk Tempat Brondolan" period January – August 2019 (KUD Usaha Tani, KUD Trani Maju & KUD Mekar Abadi). All ex fertilizer sack at Plasma ukui are controlled and monitor to prevent the negative impact to environment.</p>	
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7.3.3	The unit of certification does not use open fire for waste disposal.	<p>Ukui II POM, Estate & Scheme Smallholder:</p> <p>PT Inti Indosawit Subur – Ukui II POM and supply bases are not use open fire for waste disposal. As described above, all waste generated from all activity at plantation and mill categorized as : organic waste (solid & liquid), anorganic waste, medical waste, laboratory waste, hazardlus waste. All waste are disposed according to the procedure as described in indicator 7.3.2 without any open fire.</p>	Comply
<p>Criteria 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.</p>			
7.4.1	Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.	<p>Own Estates</p> <p>Both own estate and smallholder has had the procedure related to manage soil fertility (see detail in indicator 3.3.1). The implementation of manuring is based on fertilizer recommendation that set by Asian Agri’s Research and Development Department. Fertilizer dosage has set according to the soil needed refer to SSU/LSU.</p> <p>Based on interview with manuring team in Block D98e Soga Estate obtain information that they has been trained to not applied fertilizer in riparian or water source to minimize environmental impact. Other sample is land application in Block B89c Sei Lala Estate where the land application officer shall ensure and control the effluent only applied in flatbed. The application out of flatbed area strictly prohibited.</p> <p>Scheme Smallholder:</p> <p>Based on interview with smallholder representatives obtain information that they only using fertilizer according to the recommendation from Asian Agri’s</p>	Comply

		Research and Development Department. No fertilizer applied in riparian area to minimize environmental impact.	
7.4.2	Periodic tissue and soil sampling is carried out to monitor and manage changes in soil fertility and plant health.	<p>According to the Asian Agri’s agricultural policy, soil sampling conducted every 5 years while leaf sampling conducted annually. Based on document verification sighted the report of soil and leaf sampling in own estate and smallholders as follows:</p> <ul style="list-style-type: none"> • The last soil sampling conducted on Februari 2018. Parameter that tested is N, C, K, Ca, Mg and pH. • The last leaf sampling conducted on October 2018. Parameter that tested is major element (Ash, N, P, K Mg, Ca) dan Minor element (B, Cu, Zn, Mn, Fe). <p>Those report is converted to be fertilizer recommendation by Asian Agri’s Research and Development Department.</p>	Comply
7.4.3	A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.	<p>Own Estates</p> <p>According to the Agricultural Policy Manual, certificate holder has had a guidance in organic fertilizers such as Empty Fruit Bunch (EFB) and Palm Oil Mill Effluent (POME). Certificate holder has implemented EFB application in estate with dosage 30 – 50 ton/Ha in normal soil and POME with dosage 750 m3/Ha only Sei Lala Estate which is near the Ukui II mill.</p> <p>During the audit, auditor has observe the implementation of EFB application EFB Application, Block D98a Soga Estates and POME in Block B89c Sei Lala Estate.</p> <p>Scheme Smallholder:</p>	Comply

		According to the interview with smallholder representatives, there is no longer EFB application at this time since their area include in replanting plan on 2021.	
7.4.4	Records of fertiliser inputs are maintained.	Record of fertilizer application in each estates are in places. For example, <ul style="list-style-type: none"> • There is a record of Rock Phosphate application in D98e with dosage 0.75 kg/palm in fertilizer supervisor daily report. • There is a record of ZA application in KUD Usaha Tani Plot No 160 with dosage 4.30 kg/palm in progress report of smallholder owners book. 	Comply
Criteria 7.5:			
Practices minimise and control erosion and degradation of soils.			
7.5.1	(C) Maps identifying marginal and fragile soils, including steep terrain, are available.	<p>Own Estates</p> <p>Asian Agri’s Research and Development Department has conducted soil survey semi detail in PT Inti Indosawit Subur (Soga and Sei Lala Estate) on 2010. Based on the report found the soil taxonomy refer to USDA 2006 as follows:</p> <ul style="list-style-type: none"> • Typic Endoaquents (0.36% from the total area) • Typic Endoaquepts (14.13 % from the total area) • Typic Hapludults (5.18% from the total area) • Typic Dystrudepts loamy (16.76% from the total area) • Typic Dystrudepts sandy loamy (63.57% from the total area) <p>Soil topography:</p> <ul style="list-style-type: none"> • Flat – undulating (0 – 8%) → 15.15% from the total area • Rolling (8 – 15%) → 36.29% from the total area • Rolling - Hilly (15 – 30%) → 45.68% from the total area • Steep (>30%) → 2.88% from the total area <p>Based on field visit in Soga and Sei Lala Estate sighted ground management in steep area as follows:</p>	Comply

		<ul style="list-style-type: none"> • Terracing in contour area. • Frond stacking alongside the contour. • No chemical in <i>Neprolephis bisserata</i>. • EFB application. <p>Scheme Smallholder: Asian Agri's Research and Development Department has conducted soil survey semi detail in Smallholder Area of PT Inti Indosawit Subur on 2010. Based on the report found the soil taxonomy refer to USDA 2006 as follows:</p> <ul style="list-style-type: none"> • Typic Dystrudepts (49.26% from the total area) • Typic Endoaquepts (46.71 % from the total area) • Typic Haplosaprist (4.03% from the total area) <p>Soil topography:</p> <ul style="list-style-type: none"> • Flat – undulating (0 – 8%) → 58.83% from the total area • Rolling (8 – 15%) → 7.06% from the total area • Rolling - Hilly (15 – 30%) → 34.11% from the total area <p>These map are available in each unit.</p>	
7.5.2	There is no extensive replanting of oil palm on steep terrain.	Based and document verification and field observation, there is no extensive replanting activity in steep terrain both own estate or smallholder area.	Comply
7.5.3	There is no new planting of oil palm on steep terrain.	According to the interview with estate manager as company representative, there is no new planting plan in own estate or smallholder area.	Comply
<p>Criteria 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.</p>			

7.6.1	(C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations.	Certificate holder through Agri Agri's Research and Development Department has conducted soil mapping 2010. They also had SOP AA-APM-OP-1100.05-R3 dated 23 November 2016: <i>Konservasi Tanah dan Air</i> (Soil & Water Conservation) as guidance for soil conservation in each topography During this audit, auditor has been confirmed that there is no new planting (land extension) of PT Inti Indosawit Subur or plasma area. It is only replanting activity that conducted in 2017.	Comply
7.6.2	Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.	During this audit, auditor has been confirmed that there is no new planting (land extension) of PT Inti Indosawit Subur or plasma area. It is only replanting activity that conducted in 2017. Replanting activity in steep area using a terrace contour for soil conservation.	Comply
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	During this audit, auditor has been confirmed that there is no new planting (land extension) of PT Inti Indosawit Subur or plasma area. It is only replanting activity that conducted in 2017. Replanting activity in steep area using a terrace contour for soil conservation.	Comply
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) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.	According to soil map semi detail scale 1:25,000 and also verified during field visit, confirmed that there is no peat soil at area Soga Estate, Sei Lala Estate and Ukui Plasma. There are 4 types of soil in Soga & Sei Lala Estate and Plasma Ukui area, namely: 1. Typic Dystrudepts 2. Typic Endoaquepts 3. Typic Haplosaprists 4. Typic Placaquods Therefore this indicator is not applicable.	Not applicable

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7.7.2	Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat.	According to soil map semi detail scale 1:25,000 and also verified during field visit, confirmed that there is no peat soil at area Soga Estate, Sei Lala Estate and Ukui Plasma. Therefore this indicator is not applicable.	Not applicable
PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).			
7.7.3	(C) Subsidence of peat is monitored, documented and minimised.	According to soil map semi detail scale 1:25,000 and also verified during field visit, confirmed that there is no peat soil at area Soga Estate, Sei Lala Estate and Ukui Plasma. Therefore this indicator is not applicable.	Not applicable
7.7.4	(C) A documented water and ground cover management programme is in place.	According to soil map semi detail scale 1:25,000 and also verified during field visit, confirmed that there is no peat soil at area Soga Estate, Sei Lala Estate and Ukui Plasma. Therefore this indicator is not applicable.	Not applicable
7.7.5	(C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.	According to soil map semi detail scale 1:25,000 and also verified during field visit, confirmed that there is no peat soil at area Soga Estate, Sei Lala Estate and Ukui Plasma. Therefore this indicator is not applicable.	Not applicable
PROCEDURAL NOTE: Full details of the RSPO Drainability Assessment Guidelines and related concepts and detailed actions are in the manual currently being fine-tuned/tested by PLWG. A final version should be approved by PLWG in January 2019 and will include additional guidance on the steps to be followed after the decision not to replant as well as implications for other stakeholders, smallholders, local communities and the unit of certification. It is recommended that a further twelve-month methodology trial period is			

proposed for all related management units (i.e. those with plantations on peat) to utilise the methodology and provide feedback to the PLWG to enable further refinement of procedure as appropriate before January 2020. Units of certification have the option to defer replanting till after the availability of the revised guidelines. Additional guidance on alternative crops and rehabilitation of natural vegetation will be provided by PLWG.

PROCEDURAL NOTE:

PLWG and the Smallholder Interim Group (SHIG) will collaboratively develop guidance for Independent Smallholders [cross links to SHIG and GHG issues].

7.7.6	(C) All existing plantings on peat are managed according to the RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2018) and associated audit guidance.	According to soil map semi detail scale 1:25,000 and also verified during field visit, confirmed that there is no peat soil at area Soga Estate, Sei Lala Estate and Ukui Plasma. Therefore this indicator is not applicable.	Not applicable
7.7.7	(C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2018) and associated audit guidance.	According to soil map semi detail scale 1:25,000 and also verified during field visit, confirmed that there is no peat soil at area Soga Estate, Sei Lala Estate and Ukui Plasma. Therefore this indicator is not applicable.	Not applicable

Criteria 7.8

Practices maintain the quality and availability of surface and groundwater.

7.8.1	A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following: 7.8.1a The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.	Ukui II POM & Estate: Water management at Estate has been performed by protection the source of water, use the water according to necessity and monitoring the water quality (surface and ground water). Company has "SOP Pengelolaan Sempadan AA-AMP-OP-1100.21-R1" dated 01/12/2014, as guidance to preserve riparian area (river buffer zone, water catchment area, lake buffer zone, spring buffer zone). Point 6.2.4 and 6.2.5 explains during replanting, non-productive plant	Comply
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		<p>within buffer zone will be left as it is, but no chemical regime should applied. Enrichment with native tree species.</p> <p>Water source management: Identification of water source and wetland, as indicated in HCV report 2010. The water source identified mill’s water reservoir and river at Soga Estate and Sei Lala Estate (Napuh tributary, Air Hitam Kanan river and Air Hitam Kiri river). Policy to prohibit chemical application in riparian zone. Policy to prohibit fish poisoning and prohibit wood felling in area of company plantation.</p> <p>Monitoring of water quality performed each semester by PT Inti Indosawit Subur – Soga Estate & Sei Lala Estate including waste water generated from housing area and workshop. Water and waste water analyzed by accredited laboratory “UPT Laboratorium Bahan Konstruksi Dinas Pekerjaan Umum dan Tata Ruang Provinsi Riau”. Sample seen on Clean Water analysis (Ground Water) at housing Soga Estate and Sei Lala Estate dated 13/06/2019, analysis result shown that all parameter analyzed are met with the standard regulation.</p> <p>Surface water quality test (Sungai Pematang River and Air hitam river upstream and downstream) by Sucofindo on 17 May 2019 shown the result “Report of Analysis No. 01670/ALAIAM” is comply with Government Regulation of Republic Indonesia No. 82/2001.</p> <p>PT Inti Indosawit Subur are not restrict access to clean water or contribute to pollution of water used by communities.</p> <p>Scheme Smallholder:</p> <p>Plasma Ukui Group ha policy to prohibit chemical application near to water course 3 m from left and right side of waterways as per Circular letter “</p> <p>The policy has been disseminated to smallholder member and TUS team on 19 October 2019 as per “Notulen pelatihan Konservasi Tanah dan Air”.</p>	
	7.8.1b Workers have adequate access to clean water.	Ukui II POM & Estate:	

		<p>Company provide the clean water for workers at housing area with ground water (drill well) at Soga Estate and Sei Lala Estate and clean water from Mill water treatment for Mill workers Housing. Regular water analysis was performed to monitor the water quality. Water analysis performed by accredited laboratory "UPT Laboratorium Bahan Konstruksi Dinas Pekerjaan Umum dan Tata Ruang Provinsi Riau". Sample seen on Clean Water analysis (Ground Water) at housing Ukui Estate dated 13/06/2019, Report of analysis result shown that all parameter analyzed are met with the standard regulation PermenKes No. 492/MENKES/PER/IX/2010</p> <p>During interview with sampled workers (harvester, spraying workers, mill workers and office workers) confirmed that they got clean water freely which provide by Estate and Mill.</p> <p>Scheme Smallholder:</p> <p>Most of the smallholder member including the workers are stay in their own housing at the village (SP). Most of the smallholder member using the river water for daily activity (washing & toilet) and ground water for clean water. In addition in the village there are many agent provide the clean water in the water gallon.</p>	
7.8.2	<p>(C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017).</p>	<p>Ukui II POM & Estate:</p> <p>PT Inti Indosawit Subur – Ukui II POM and Estate has establish the procedure "Pengelolaan Riparian AA-APM-OP-1100.21-R2 dated 7 December 2015. The procedure defined the criteria of riparian area, lake, spring water and protected area. Each river determined the riparian zone 50 m on the left and right side the river with wide < 12m and 100 m for the river which wide >12 m. All riparian zone was sign by boundary poles and signboard. Riparian restoration performed in the critical/degraded area to enhance and rehabilitate the ecosystem. When the replanting activity performed, it was prohibit to conducted land preparation/clearing in riparian area. During field visit at Napuh</p>	Comply

		<p>tributary, Air Hitam river it can be demonstrated that in the riparian area there is no replanting activity. Protection of riparian areas also performed with no chemical crops care activities both fertilizer and herbicide spraying.</p> <p>Scheme Smallholder:</p> <p>Riparian Protection was established and described about buffer zone, riparian buffer and natural river. Plasma Ukui has a procedure to maintain and conserve the riparian under procedure "Restorasi Riparian dan Areal Disekitar Danau/Waduk atau Mata Air Lainnya AA-KL-12-EFP".</p> <p>Management of Ukui Plasma has conducted dissemination to farmer members related HCV, soil and water conservation, and good agriculture practice. Dissemination material was evident; HCV, soil and water conservation was focused on fertilizer and agrochemical application near the waterways; good agriculture practice focused on spraying activity must performed by TUS team from company worker and cannot be done by farmer themselves, prohibition of blanket spraying, FFB ripeness criteria, loose-fruit picking and importance of PPE.</p> <p>Management of Ukui Plasma has installed signboard "Batas Semprot" (spraying boundary) at minimum 3 meters from waterways. There are 2 type of signboard, which is (1) Prohibition of fertilizer and agrochemical application at < 3 meters from waterways; and (2) signboard to mark the boundary area. Plasma Ukui also has marking the boundary of riparian area by painting the tree.</p> <p>Management of Ukui Plasma has installed erosion anchor, made pile and planted "waru" (Hibiscus similis) and "ketapang" (Terminalia catappa) tree at the side of waterways.</p>	
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<p>7.8.3</p>	<p>Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.</p>	<p>Ukui II POM:</p> <p>Ukui II Palm Mill has an effluent treatment through treated ponds system. There were 8 ponds system consist of 1 Cooling Pond capacity 6,000 m³, 2 Primary Anaerobic pond capacity 35,000 m³, 1 Secondary Anaerobic pond cappacity 22,000 m³, 2 Acidification pond capacity 6,000 m³, and buffering pond capacity 17,000 m³.</p> <p>Company has permit to apply waste water to land application at plantation as per "Keputusan Kepala Dinas PEnanaman Modal dan Pelayanan Terpadu Satu Pintu Kab. Pelalawan Nomor: 503/DPMPTSP-LA/2019/07 Tentang Izin Pemanfaatan Air Limbah Kepada PT Inti Indosawit Subur PMKS Ukui II" dated 26 August 2019 valid until 5 years after issuance.</p> <p>Quality of waste water effluent is monitored monthly in line with the requirements of regulation Kep Men LH No.29/2003. The result of POME monitoring was reviewed including measurement of BOD for period January – October 2019. The Ministry of Environment Decree #29/2003 and permit of land application required that BOD of POME flowed to land application is less than 5,000 mg/litre and pH 6 - 9. The result of POME quality during this period was BOD less than 5,000 mg/litre and pH between 6 and 9. Below are the BOD and pH measured for period January – October 2019:</p> <table border="1" data-bbox="999 1259 1706 1378"> <thead> <tr> <th rowspan="2">Period (Month)</th> <th colspan="2">BOD (mg/l)</th> <th colspan="2">pH</th> </tr> <tr> <th>Analysis result</th> <th>Standard</th> <th>Analysis result</th> <th>Standard</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Period (Month)	BOD (mg/l)		pH		Analysis result	Standard	Analysis result	Standard						<p>Comply</p>
Period (Month)	BOD (mg/l)			pH													
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		<table border="1"> <tr><td>January</td><td>4,483</td><td>5,000</td><td>7.65</td><td>6 - 9</td></tr> <tr><td>February</td><td>3,204</td><td>5,000</td><td>7.36</td><td>6 - 9</td></tr> <tr><td>March</td><td>821.4</td><td>5,000</td><td>6.86</td><td>6 - 9</td></tr> <tr><td>April</td><td>10,469</td><td>5,000</td><td>7.47</td><td>6 - 9</td></tr> <tr><td>May</td><td>3,200</td><td>5,000</td><td>8.30</td><td>6 - 9</td></tr> <tr><td>June</td><td>3,600</td><td>5,000</td><td>7.12</td><td>6 - 9</td></tr> <tr><td>July</td><td>3,700</td><td>5,000</td><td>7.09</td><td>6 - 9</td></tr> <tr><td>August</td><td>3,400</td><td>5,000</td><td>8.23</td><td>6 - 9</td></tr> <tr><td>September</td><td>3,800</td><td>5,000</td><td>8.40</td><td>6 - 9</td></tr> <tr><td>October</td><td>3,400</td><td>5,000</td><td>8.14</td><td>6 - 9</td></tr> </table> <p>According to above data, generally BOD was met with the standard Kep Men LH No.29/2003. However during April 2019, BOD was exceed the threshold due to there is a pump breakdown whereby resulting the waste water were not circulate. Ukui II POM has taken action by repairing the pump and the BOD can be met with the standard after the pump repaired.</p>	January	4,483	5,000	7.65	6 - 9	February	3,204	5,000	7.36	6 - 9	March	821.4	5,000	6.86	6 - 9	April	10,469	5,000	7.47	6 - 9	May	3,200	5,000	8.30	6 - 9	June	3,600	5,000	7.12	6 - 9	July	3,700	5,000	7.09	6 - 9	August	3,400	5,000	8.23	6 - 9	September	3,800	5,000	8.40	6 - 9	October	3,400	5,000	8.14	6 - 9	
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September	3,800	5,000	8.40	6 - 9																																																	
October	3,400	5,000	8.14	6 - 9																																																	
7.8.4	Mill water use per tonne of FFB is monitored and recorded.	<p>Ukui II POM: PT IIS – Ukui II POM has monitor the mill water usage for FFB process daily and monthly according to flowmeter chart. Ukui II POM has determined the water usage budget for FFB process as much as 1.00 m³/ton FFB. Since January – November 2019, total water usage/consumption for FFB process was 251,087 m³ or 0.95 m³/ton FFB. Below are the detail of mill water usage fro FFB process:</p> <table border="1"> <thead> <tr> <th>Period</th> <th>Water usage for FFB process</th> <th>FFB Process</th> <th>Ratio water usage/MT FFB</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Period	Water usage for FFB process	FFB Process	Ratio water usage/MT FFB					Comply																																										
Period	Water usage for FFB process	FFB Process	Ratio water usage/MT FFB																																																		

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	January	29,700	26,253.91	0.91
	February	24,726	24,057.62	0.82
	March	25,047	23,042.82	0.85
	April	26,386	22,942.03	0.95
	May	24,756	21,893.54	0.95
	June	27,241	24,511.32	0.95
	July	28,355	24,951.88	0.98
	August	28,832	22,210.48	1.11
	September	28,195	25,426.89	0.96
	October	28,620	26,302.85	0.98
	November	25,222	22,796.45	0.98
	Total			0.95

Based on above table can be demonstrated that mill water uysage for FFB process average was 0.95 m³/ton FFB and still under budget 1.00 m³/ton FFB.

Criteria 7.9:
 Efficiency of fossil fuel use and the use of renewable energy is optimised

7.9.1	A plan for improving efficiency of the use of fossil fuels and to optimize renewable energy is in place, monitored and reported	<p>Ukui II POM & Estate:</p> <p>Fossil fuel usage for Ukui II Palm Oil Mill was monitored monthly. Fossil fuel use mainly for generator set (genset). Actual diesel fuel usage since January – November 2019 was 94.319. Ukui II POM has monitoring the diesel fuel usage each month. Diesel fuel efficiency has implementing by using renewable energy from fiber/shell and reduce the generator set operation.</p>	Comply
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		<p>Company used all the fibre and kernel shell as renewable energy for boiler fuel. The remaining fibre and kernel shell used as replacement of diesel fuel when the palm oil mill is not operating. Company has prepared for fibre and shell -fueled boiler utilization every month. Since January – November 2019 total fibre use for boiler fuel Ukui II POM was 32,264 ton and shell usage for boiler fuel was 10,630 ton.</p> <p>Ukui II POM has a programme to reduce the diesel fuel usage by monitoring the electricity usage by mill management, reducing the diesel fuel usage for generator set by substitute the electric usage from generator set to become PLN electric. In addition to minimize fossil fuel (diesel fuel) usage, Uku II POM has a project to using B20 50% + FAME 50%. FAME was made from CPO material without fossil fuel mixing.</p> <p>Program has covered plan to use renewable energy from fiber/shell and from fossil fuel/HSD fuel. Based on energy use data, palm oil mill has utilized more fiber/shell, up to 95% - as energy compared to use of HSD oil use. Ukui II POM shows "Laporan Unit Pabrik" up to November 2019, Based on data of energy production, shows increase, has been monitored monthly basis.</p> <p>Soga Estate, Sei Lala Estate and Mill monitors the use of diesel fuel every month. Diesel fuel efficiency in Estate the efficiency of diesel is done by limiting the genset working hours for housing but not reducing the basic need of electricity for housing. Each home unit is also limited for 2 amperes of power. Beside that, plan for improving efficiency of the use of fossil fuels and to optimise renewable energy are:</p> <ul style="list-style-type: none"> ▪ Repair broken road and maintenance the road to get best time for FFB transporation ▪ Repair and maintenance the vehicle and heavy equipment to get best condition for fossil fuel saving. • Program savings by calculating the ratio of fuel usage, each tool and vehicle. Ex; Bus: 3.7 Km / Lt, Dump truck: 3:58 km / lt, Truck: 3.6 km / lt, 	
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		Supervision: 8 km / lt, Tractor: 4 l / hm, Grader: 8LT / hm, Backhoe: 7 lt / hm, Genset: 22 l / hm, Small Genset: 5.8 l / hm	
Criteria 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.			
7.10.1	(C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimize them are implemented, monitored through the Palm GHG calculator and publicly reported.	<p>Ukui II POM & Estate:</p> <p>PT Inti Indosawit Subur – Ukui II POM has identify the significant pollutants and greenhouse gas (GHG) emissions under “Evaluasi Aspek Dampak Lingkungan EMS-431-003-LT” latest updated on 5 Februari 2018 (Soga Estate & Sei Lala Estate) and 5 March 2018 (Ukui II POM):</p> <ul style="list-style-type: none"> - Boiler stack emission including particulate and soot - Diesel electric generator emission - POME methane emission - Use of fertiliser - Use of pesticide/herbicide - Use of chemical material - Vehicle and heavy equipment emission <p>To control and minimize the greenhouse gas emission and pollution, company has set the program under “Program Manajemen Lingkungan”. The program consists of source of pollution/emission, type of pollution/emission produced, improvement program, person in charge and timeline. The program covers:</p> <ul style="list-style-type: none"> - Control the emission from operational vehicle, where all vehicle shall follows emission test and meet the quality standards; - When vehicle fails to meet quality standard, a repair/maintenance will performed; 	Comply

		<ul style="list-style-type: none"> - Reducing the fossil fuel usage by converting the genset power electricity to become PLN electricity. - Reducing the chemical fertilizer by application the organic fertilizer such as: EFB and waste water for land application - Appropriate fertilizer application (dosage, time, way and place) as per recommendation from R&D - Reducing the herbicide/pesticide usage by Specific target weeds and pest control, implementing the integrated pest management, planting the hostplan as a nest/hostplan for pest predator, introduction and conserving the natural enemies of pest and disease. - Reducing GHG with optimal use of effluent as source of energy for power plant, through use of biogas plant. <p>Company has SOP Manajemen & Metode Menghitung Emisi Gas Rumah Kaca (GHG) AA-MPM-OP-1400.19.R2.</p> <p>PT IIS – Ukui II POM has calculate the GHG emission using appropriate tools RSPO Palm GHG Version 3.0.1. Calculation of GHG emission period 2018 (January – December). Based on summary of emissions, Total tCO₂e/t product are: 0.7 tCO₂e/t CPO and 0.7 tCO₂e/t PK. Based on data input verification can be demonstrated that all data input for GHG emission calculation was valid and relevant with actual condition and well calculated.</p> <p>Ukui Smallholder:</p> <p>Significant pollutants and greenhouse gas (GHG) emissions has identified for Ukui I Smallholder under document of Aspect Impact Evaluation of the environment as per "Evaluasi Aspek Dampak Lingkungan EMS-431-002-LT updated on January 2019. Contain information of work activities, pollutant and</p>	
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		<p>environmental impact, action plan to mitigate the pollution and environmental impact, target and PIC.</p> <p>The Smallholder manager has develop management plan to reduce pollutants and emissions, presented in "Pedoman Untuk Meningkatkan Efisiensi Penggunaan Energi" January 2019. Below are the management plan to reduce the pollutant and emissions:</p> <ul style="list-style-type: none"> - Optimize FFB transportation, not to return to Kavling - Aranging the FFB collection place (TPH) along the collection road to become one way to ease the FFB transportation - Reducing the use of grass cutting machine for weeds control and cooperate with TUS team to handle the weeds control in farmer kavling. <p>Convert the generator usage to become PLN electric usage to reduce the emission of generator usage.</p>	
7.10.2	(C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimize them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).	<p>PT Inti Indosawit Subur – Ukui Group Certification unit and supply bases (including smallholder) has develop the palm oil plantation since 1987, 1988, 1989, and the company has starts replanting in 2015.</p> <p>There is no new planting, therefore, the requirement of this indicator is not applicable.</p>	Comply
7.10.3	(C) Other significant pollutants are identified and plans to reduce or minimize them implemented and monitored.	<p>Ukui II POM & Estate:</p> <p>Identification of pollution and emission sources at Mill and Estates activities were evident. The source of pollution, type of pollution and its control was documented in List of environmental aspect and impact evaluation "Evaluasi Aspek – Dampak Lingkungan EMS-431-003-LT" latest updated on Februari 2019 (Soga Estate & Sei Lala Estate) and March 2019 (Ukui II POM).</p> <ul style="list-style-type: none"> - Boiler stack emission including particulate and soot - Diesel electric generator emission - POME methane emission 	Comply

		<ul style="list-style-type: none"> - Use of fertiliser - Use of pesticide/herbicide - Use of chemical material - Vehicle and heavy equipment emission <p>All the activities of mill and estate as well as the waste generated from has been well documented, for examples the operational activities from generator is generates air emissions, the company conducts periodic generator maintenance and perform quality measurement of exhaust emissions each semester to ensure air quality is comply with standard regulation</p> <p>Monitoring of air emissions and ambient air quality conducted every semester. Emissions test conducted by Accredited Testing Laboratory. The results of the analysis can be demonstrated, and it was indicate in accordance with the quality standards established.</p> <p>Ukui II POM is able to demonstrated "Program Manajemen Lingkungan 2019", detailing plan to reduce significant green house gases that has been identified equipped with a monitoring plan, with explanation of appropriate tools to monitor the effectiveness of the mitigation measures.</p> <p>Ukui Smallholder: Group manager has develop the management plan to reduce pollutants and emissions, presented in "Pedoman Untuk Meningkatkan Efisiensi Penggunaan Energi" dated 4 January 2018. Mitigation measures has been developed and implemented by Ukui Smallholder.</p> <p>Green house gas emission calculation using RSPO Palm GHG Version 3.0.1 has been performed included in PT Inti Indosawit Subur – Ukui II POM and supply bases. Calculation of GHG emission period 2018 (January – December) were available as described above.</p>	
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Criteria 7.11: Fire is not used for preparing land and is prevented in the managed area.		
7.11.1	(C) Land for new planting or replanting is not prepared by burning.	<p>It was noted that Soga Estate & Sei Lala Estate has conducted replanting activities since 2017. 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 Inti Indosawit Subur – Soga Estate & Sei Lala Estate.</p> <p>All the replanting activities requires to be documented and monitored, such as: Schedule of replanting (chipping, digging and planting), progress planting LCC (Legume Cover Crop) and Minutes Works replanting (Progress in the Works Contractor).</p> <p>The company has also established Company Policy signed by Managing Director, Kevin Tio, on 1 December 2014. Point 6 of the policy stated the company uses Zero Burning practice in developing plantation and actively support initiative to prevent and monitor forest fire and haze.</p> <p>Based on field observation, it was evident that no fire has been used for replanting in Ukui Estate.</p> <p>Ukui Smallholder:</p>
		Comply

		<p>The Smallholder Manager has prepared the policy that there were no land preparation by burning, as per “Kebijakan Manager Plasma Ukui” dated 2 December 2016, Revised in 16 January 2017 in poin 6: “Melakukan praktek tanpa bakar dalam kegiatan pembangunan perkebunan dan petani maupun desa secara aktif mendukung inisiatif mencegah mengawasi kebakaran hutan dan asap” (Implementing non-burning practices in plantation development activities, farmers and villages actively support initiatives to prevent and control forest fires and smoke).</p> <p>The policy has communicated to individual member and available in guidance book (Buku Panduan dan Catatan) which distributing to all farmers as well as the information display on the notice board in filed also emphasize on the no use of fire policy. During interview with smallholder member in KUD Usaha Tani, KUD Trani Maju and KUD Mekar Abadi indicated that they have understanding on zero burning policy.</p>	
7.11.2	<p>The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification.</p>	<p>PT Inti Indosawit Subur – Soga Estate, Sei Lala Estate including Smallholder has performed and establishes fire prevention and control measures for whole area of company. Fire monitoring was done daily by Fire team and security to monitor the hotspot and fire by patrol to critical area of plantation. Maps of fire critical area has been develop and determined by company and monitor accordingly as per “Peta Area Rawan Kebakaran PT Inti Indosawit Subur – Kebun Soga & Kebun Sei Lala”. According to hotspot monitoring period Januari – June 2019 shown that there is no hotspot identified at both Soga and Sei Lala Estate.</p> <p>In addition, company implementing fire danger rating as early warning system. According to monitoring result since January – June 2019, generally fire danger rating categorized as low risk.</p> <p>Basic fire training also has been performed to increase the competency of workers particularly for emergency response team. Latest basic fire training conducted on 11 April 2019 together with Ukui Estate team(attend by 26 person).</p>	Comply

		<p>Tools and equipment of fire prevention has been prepared by company as per "Daftar Peralatan Pemadam Kebakaran".</p> <p>The activity of fire prevention and control present in "Laporan Pencegahan Pencemaran dan atau Kerusakan Lingkungan Hidup yang Berkaitan dengan Kebakaran Lahan" Period January – June 2019. Report of fire prevention and control are submitted to related authority (Dinas Lingkungan Hidup & Dinas Perkebunan) each semester.</p>	
7.11.3	<p>The unit of certification engages with adjacent stakeholders on fire prevention and control measures.</p>	<p>Ukui Estate and POM:</p> <p>PT Inti Indosawit Subur Ukui Group has a programme namely "Fire Free Village Programme (FFVP)". PT IIS recognize this engagement program, comprises the following segments:</p> <ul style="list-style-type: none"> - Increase community awareness. Company conduct intensive communication with the local community to increase awareness on the impact of fire and haze on health - Empowerment village head. During the dry season, villages play a significant role to synergize the prevention and mitigation of land fire. - Provide support for land clearing - Appreciation for zero burning - Assistance to enhance local economy. <p>Village which involve in this program was Bagan Limau Village with area 12,470 ha and population 2,722. A group consisting estate manager, crew leader, member of fire care community (MPA-Masyarakat Peduli Api) and sub village head are appointed to coordinate and exchange information regarding any fire occurrence within or near the village or operation area. By using social media information is expected to be promptly managed or checked.</p> <p>Regular and continuous basic fire training has been deliver by Fire Team of Asian Agri to Masyarakat Peduli Api. Latest training conducted on 1 November 2019 at bagan Limau Village and 26 October 2019 attend by 114 participant.</p>	Comply

		<p>Scheme Smallholder:</p> <p>The Smallholder Manager has prepared the policy that there were no land preparation by burning, as per "Kebijakan Manager Plasma Ukui" dated 2 December 2016, Revised in 16 January 2017 in poin 6: "Melakukan praktek tanpa bakar dalam kegiatan pembangunan perkebunan dan petani maupun desa secara aktif mendukung inisiatif mencegah mengawasi kebakaran hutan dan asap" (Implementing non-burning practices in plantation development activities, farmers and villages actively support initiatives to prevent and control forest fires and smoke).</p> <p>The policy has communicated to individual member and available in guidance book (Buku Panduan dan Catatan) which distributing to all farmers as well as the information display on the notice board in filed also emphasize on the no use of fire policy.</p> <p>Fire monitoring and patrol has been performed weekly and depend on the condition during dry season. Evidence of monitoring present in "Monitoring Patroli Api" sample seen for KUD Usaha Tani, KUD Trani Maju and KUD Mekar Abadi.</p>	
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Criteria 7.12:
 Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.

PROCEDURAL NOTE for 7.12:
 The 2018 RSPO P&C include new requirements to ensure the effective contribution of RSPO to halting deforestation. This will be achieved by incorporating the High Carbon Stock Approach (HCSA) Toolkit in the revised standard.
 The RSPO ToC also commits RSPO to balancing sustainable livelihoods and poverty reduction with the need to conserve, protect and enhance ecosystems.
 High Forest Cover Countries (HFCCs) urgently require economic opportunities that enable communities to choose their own development path, while providing socio-economic benefits and safeguards.

<p>Adapted procedures will be developed to support the sustainable development of palm oil by indigenous peoples and local communities with legal or customary rights. These will apply in specific HFCCs, and within those, in High Forest Cover Landscapes (HFCLs).</p> <p>The development of these procedures will be guided by a No Deforestation Joint Steering Group (NDJSG) of RSPO and HCSA members. In HFCCs, RSPO will work through national and local participatory processes with governments, communities and other stakeholders to develop these procedures. A timeframe for these activities is stipulated in the Terms of Reference for the NDJSG and publicly available.</p>			
<p>7.12.1</p>	<p>(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests.</p> <p>A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</p>	<p>PT Inti Indosawit Subur – Ukui Group Certification unit and supply bases (including smallholder) did not carry out any new plantings after November 2005. The planting year started in 1987, 1988, 1989, and the company has starts replanting in 2015 – 2018.</p> <p>Therefore, the requirement of this indicator is not applicable.</p>	<p>Not applicable</p>
<p>7.12.2</p>	<p>(C) HCVs, HCS forests and other conservation areas are identified as follows: 7.12.2a For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p>	<p>PT Inti Indosawit Subur – Ukui Group is in cooperation with Faculty of Forestry, Bogor Agriculture University in preparing HCV Identification “Dokumen Identifikasi dan Analisis Keberadaan Nilai Konservasi Tinggi (NKT) di Areal Perkebunan Kelapa Sawit di Kebun Ukui dan Soga pada tahun 2010”. Guidance use is HCV Toolkit 2008. The document has put into consideration the landscape condition, including Teso Nilo National Park near the plantation. HCV assessment was including plasma/scheme smallholder area.</p> <p>The assessment team comprise of Ir.Nyoto Santoso, MS as lead assessor HCV RN registered lead assessor, Ir.Heru B Pulunggono, MSc (hydrology and soil conservation), Handian Purwawangsa, S.Hut, MSI, (social), Iing Nasihin S.Hut, MSi (flora and GIS), Tutut Sunarminto, MSi, (social and cultural), Yanti Apriyanti, S.Pi (social and cultural), Rizki Ratna Ayu Paramita Sari, S.Hut (social and cultural). The HCV assessment identified the presence of HCV 1.1, HCV 1.2, HCV 1.3, HCV 2.3, HCV 4.1 and HCV 6 with total (under PT Inti Indosawit Subur – Ukui Group/Ukui Estate and Soga Estate) of 234.458 Ha.</p> <p>HCV identified in Soga Estate & Sei Lala Estate are as bellow:</p>	<p>Not applicable</p>

HCV	Status	Ha
River/Sungai Napuh	1.1, 1.2, 4.1	27.770
Tributary/Anak Sungai Napuh	1.1, 1.2, 4.1	5.985
Tributary/Anak-Anak Sungai Napuh	1.1, 1.2, 4.1	0.800
River/Hulu Sungai Air Hitam Kiri	1.1, 4.1	31.005
River/Hulu Sungai Air Hitam Kanan	1.1, 4.1	19.656
Waste water pond/Kolam Limbah	1.1, 4.1	2.057
Water reservoir/Waduk	1.1, 4.1	2.400
Graveyard/Makam Afdeling 1	1.1, 4.1	0.443
Graveyard/Makam Afdeling 5	1.2, 1.3, 2.3, 5	0.060
Graveyard/Makam Afdeling 2	6	2.109
Graveyard/Makam Arah SP VI	6	0.005
Total		92.290

Most of the HCV identified, located within the existing plantation. Company maintain the riparian area. A number of fauna identified in the plantation area: Mammals such as "Kucing kuwuk" (*Felis bengalensis*), "Kancil" (*Tragulus javanicus*), "Kijang" (*Muntiacus muntjak*), "Trenggiling" (*Manis javanica*), Monkey (*Macaca fascicularis*), "Beruk" (*Macaca nemestrina*), "Musang" (*Paradoxurus hermaphroditus*). Birds such as "Raja udang meninting" (*Alcedo meninting*), "Burung madu" (*Aethopyga siparaja* and *Nectarinia jugularis*), "Elang tikus" (*Elanus caeruleus*), "Elang ular bido" (*Spilomis cheela*), "Cekakak belukar" (*Halcyon smymensis*), "Kipasan belang" (*Rhipidura javanica*). Reptile such as "Ular Piton" (*Phyton molurus*), Biawak (*Varanus salvator*). Identified also protected plants such as "Meranti batu" (*Shorea leprosula*), "Meranti bunga" (*Shorea teysmanniana*).

		<p>HCV assessment performed in consultation with relevant stakeholders/public consultation.</p> <p>The HCV identification report was peer reviewed by WWF on 10/25/2010 - 10/27/2010.</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 HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p>	<p>PT Inti Indosawit Subur – Ukui Group Certification unit and supply bases (including smallholder) did not carry out any new plantings after November 2005. The planting year started in 1987, 1988, 1989, and the company has starts replanting in 2015 – 2018.</p> <p>Therefore, the requirement of this indicator is not applicable.</p>	
<p>PROCEDURAL NOTE for 7.12.2:</p> <p>For details of transitional measures, refer to Annex 5: RSPO transition from HCV assessments to HCV-HCSA assessments.</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 into consideration regional and national multi-stakeholder processes. Until this procedure is developed and endorsed, 7.12.2 applies.</p>	<p>According to HCV assessment 2010, there is no High Forest Cover Landscapes (HFCLs) identified. Most of the HCV identified, located within the existing plantation. Company maintain the riparian area.</p>	Comply
<p>PROCEDURAL NOTE for 7.12.3:</p> <p>There should be demonstrable benefits to the local community; clear recognition of legal and customary lands based on participatory land use planning; development should be proportional to the needs of the local community; with a balance between conservation and development. This procedure will also cover planting on previous or abandoned agricultural land / plantations. All other P&C requirements apply, including FPIC and HCV requirements.</p>			
7.12.4	<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 plan to protect and/or enhance</p>	<p>PT Inti Indosawit Subur – Ukui Group Certification unit and supply bases (including smallholder) did not carry out any new plantings after November</p>	Not applicable

	HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).	2005. The planting year started in 1987, 1988, 1989, and the company has starts replanting in 2015 – 2018. Therefore, the requirement of this indicator is not applicable.	
7.12.5	Where rights of local communities have been identified in HCV areas, 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.	PT Inti Indosawit Subur – Ukui Group Certification unit and supply bases (including smallholder) did not carry out any new plantings after November 2005. The planting year started in 1987, 1988, 1989, and the company has starts replanting in 2015 – 2018. Therefore, the requirement of this indicator is not applicable.	Not applicable
7.12.6	All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.	The HCV assessment identified the presence of HCV 1.1, HCV 1.2, HCV 1.3, HCV 2.3, HCV 4.1 and HCV 6 with total in Soga Estate was 92.290 Ha. A number of fauna identified in the plantation area: Mammals such as “Kucing kuwuk” (<i>Felis bengalensis</i>), “Kancil” (<i>Tragulus javanicus</i>), “Kijang” (<i>Muntiacus muntjak</i>), “Trenggiling” (<i>Manis javanica</i>), Monkey (<i>Macaca fascicularis</i>), “Beruk” (<i>Macaca nemestrina</i>), “Musang” (<i>Paradoxurus hermaphroditus</i>). Birds such as “Raja udang meninting” (<i>Alcedo meninting</i>), “Burung madu” (<i>Aethopyga siparaja</i> and <i>Nectarinia jugularis</i>), “Elang tikus” (<i>Elanus caeruleus</i>), “Elang ular bido” (<i>Spilomis cheela</i>), “Cekakak belukar” (<i>Halicyon smymensis</i>), “Kipasan belang” (<i>Rhipidura javanica</i>). Reptile such as “Ular Piton” (<i>Phyton molurus</i>), Biawak (<i>Varanus salvator</i>). Identified also protected plants such as “Meranti batu” (<i>Shorea leprosula</i>), “Meranti bunga” (<i>Shorea teysmanniana</i>).	Comply

		<p>Company has prepared a procedure for protection of flora and fauna, explained in Environmental Management System: Biodiversity (AA-432-002e-LT), IUCN redlist (AA-432-006-LT), CITES list (AA-432-07-LT).</p> <p>Estate has established the conservation management plan to maintain and/or enhance High conservation value area. HCV management and monitoring plan described measures taken for each HCV and its monitoring. Relevant laws were taken into account for determining appropriate measure including UU #5/1990 about Natural resources conservation, PP#7/1999 about List of protected plan and wildlife, Kepres #32/1990, and PP #26/2008. Conservation management plan Soga Estate update on 12 May 2018, consist of :</p> <ul style="list-style-type: none"> - Area demarcation and maintenance the boundary markers - Sosialization of HCV area and protection to employee and surrounding community - Riparian restoration - Prohibiting chemical application in riparian zone/river border <p>Signboards are placed on the area identified with conservation values. Monitoring for the HCVs are carried out as per Conservation Management Plan. The conservation management plan covers area enhancement, socialization to workers and local communities, prohibition of chemical regime near the area and river buffer zone restoration. Plan for monitoring and patrol has been incorporated into the management and monitoring plan. Another effort planned was to have HCV sign board and "no-hunting" sign boards placed near identified HCV areas – on progress.</p> <p>PT Inti Indosawit Subur – Ukui Group is also having procedure to monitor the protected/conservation area as per "SOP Pemantauan Areal Lindung" No.AA-PL-08-EFP – describing procedure for vegetation monitoring, wildlife monitoring (path and rapid method), conservation area inspection procedure, vegetation enhancement procedure and data analysis procedure.</p>	
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		<p>Field observation to HCV area at Soga Estate and Sei Lala Estate and document verification "Laporan Monitoring Pengelolaan Tumbuhan dan Satwa Nilai Konservasi Tinggi" of PT Inti Indosawit Subur – Kebun Soga & Sei Lala period semester I 2019 can be demonstrated that the measures contained in the management plan been actively implemented. The report of HCV management and monitoring regularly reported to BKSDA Provinsi Riau and Dinas Lingkungan Hidup Kab. Pelalawan. Company continuously disseminating HCV and wildlife protection to employee and surrounding community.</p> <p>Ukui Smallholder:</p> <p>The management of Ukui Smallholder has develop the Conservation Management Plan 2018, updated on February 2019 consist of:</p> <ul style="list-style-type: none"> - Area demarcation and maintenance the boundary markers - Sosialization of HCV area and protection to employee and surrounding community - Riparian restoration - Prohibiting chemical application in riparian zone/river border <p>Smallholder manager has defined the SOP for individual members to report on threats to HCVs and presence of RTE species in the procedure "Konflik Dengan Satwa Yang Dilindungi No. 015/DOK/SOP/PT.KLU-AA/2016" dated 2 December 2016.</p> <p>Each individual member shall be identified and observe the RTE species in their kavling. Each member notes the presence of RTE species in their "Buku Panduan dan Catatan Petani", the report was delivered to Group Manager ICS and forward to official of "BKSDA Riau". If the RTE species was Sumatra Elephant Group Manager ICS coordinated with BKSDA Riau and WWF Flying Squad to handle and prevent the conflict between human and animal.</p>	
7.12.7	The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and	Soga & Sei Lala Estate:	

	<p>RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p>	<p>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 Inti Indosawit Subur Kebun Soga dan Sei Lala periode Semester I 2019" (monitoring period January – June 2019). 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. Latest observation in November 2019 documented in the "Daftar Temuan satwa liar di areal kebun" observed several protected species at Soga and Sei Lala Estate such as: cekakak belukar (<i>Halcyon smyrnensis</i>), Kipasan belang (<i>Rhipidura javanica</i>), Crimson Sunbird (<i>Aethopyga siparaja</i>), Biawak (<i>Varanus salvator</i>), Ular Kobra (<i>Naja sumatrana</i>), Kucing akar (<i>Felis bengalensis</i>).</p> <p>Scheme Smallholder: Management of Ukui Smallholder has defined the mechanism for individual members to report on threats to HCVs in the procedure "Konflik Dengan Satwa Yang Dilindungi No. 015/DOK/SOP/PT.KLU-AA/2016" dated 2 December 2016.</p> <p>All member has responsible to report the presence of RTE species, animal conflict, and threats to HCVs in their kavling. They report to KUD or KT and forward to Smallholder Manager.</p> <p>Plasma Ukui has performed monitoring of wildlife each month by WKAK (Wadah Kerja Antar Kelompok) or head of KT (Pengurus Perlindungan Satwa Liar). Each KUD has assigned the PIC to monitor the protected animal and species based on decree letter issued by KUD. Sample seen in KUD Mekar Abadi, KUD Trani Maju and KUD Usaha Tani. Wildlife monitoring recorded in "Formulir Daftar Temuan Satwa Liar". For example monitoring result at KUD Mekar Abadi, KUD Trani Maju and KUD Usaha Tani on November 2019 there were found the presence of Cekakak belukar (<i>Halcyon smyrnensis</i>), Biawak</p>	<p>Comply</p>
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		<p>(<i>Varanus salvator</i>), Elang hitam (<i>Ictinaetus malayanus</i>), Ular Kobra (<i>Naja sumatrana</i>), Kucing hutan (<i>Felis bengalensis</i>).</p> <p>Company reported the management and monitoring of HCV including the animal presence each semester to BKSDA Provinsi Riau and Dinas Lingkungan Hidup Kab. Pelalawan.</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 Procedure (RaCP) applies.</p>	<p>PT Inti Indosawit Subur – Ukui Group Certification unit and supply bases (including smallholder) did not carry out any new plantings after November 2005. The planting year started in 1987, 1988, 1989, and the company has starts replanting in 2015 – 2018.</p> <p>Therefore, the requirement of this indicator is not applicable.</p>	Not applicable

Appendix B: Approved Time Bound Plan

Time Bound Plan		
Requirement	Remarks	Compliance
Does the plan include all current subsidiaries, estates and mills?	PT. Inti Indosawit Subur – Asian Agri Group 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.	Comply
Have all the estates and mills certified within five years after obtaining RSPO membership?	Based on Time Bound Plan revising in December 2018, Segati Mill (PT Mitra Unggul Pusaka) located in Pelalawan, Riau postponed to Re-Audit in year 2020. Status of RaCP and relevant issues are still in progress and waiting for RSPO feedback.	Comply
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three-year from the date of acquisition. Certification plan for the new acquisition shall be available.	No new acquisition.	Comply
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?	There is no changes from previous audit	Comply
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	No	Comply
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	No	Comply
Have there been any stakeholder comments?	Yes, stakeholder comment is presented within this report.	Comply
Un-Certified Units or Holdings		
No replacement after dates defined in NIs Criterion 7.3: <ul style="list-style-type: none"> • Primary forest. • Any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.3. 	Based on Time Bound Plan revising in December 2018, Segati Mill (PT Mitra Unggul Pusaka) located in Pelalawan, Riau postponed to Re-Audit in year 2020. Status of RaCP and relevant issues are still in progress and waiting for RSPO feedback.	Comply
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	Based on Time Bound Plan revising in December 2018, Segati Mill (PT Mitra Unggul Pusaka) located in Pelalawan, Riau postponed to Re-Audit in year 2020. Status of RaCP and relevant issues	Comply

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	are still in progress and waiting for RSPO feedback.	
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 2.2, 6.4, 7.5 and 7.6. The RSPO RaCP tracker shall be checked to confirm for any land conflicts/Liabilities https://www.rspo.org/certification/remediation-and-compensation/racp-tracker . The progress on the Liabilities shall be verified and reported.	Based on Time Bound Plan revising in December 2018, Segati Mill (PT Mitra Unggul Pusaka) located in Pelalawan, Riau postponed to Re-Audit in year 2020. Status of RaCP and relevant issues are still in progress and waiting for RSPO feedback.	Comply
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3.	Based on Time Bound Plan revising in December 2018, Segati Mill (PT Mitra Unggul Pusaka) located in Pelalawan, Riau postponed to Re-Audit in year 2020. Status of RaCP and relevant issues are still in progress and waiting for RSPO feedback.	Comply
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	Based on Time Bound Plan revising in December 2018, Segati Mill (PT Mitra Unggul Pusaka) located in Pelalawan, Riau postponed to Re-Audit in year 2020. Status of RaCP and relevant issues are still in progress and waiting for RSPO feedback.	Comply
Did the company conduct internal audit against the uncertified management units requirement? If yes, a positive assurance statement shall be available.	Based on Time Bound Plan revising in December 2018, Segati Mill (PT Mitra Unggul Pusaka) located in Pelalawan, Riau postponed to Re-Audit in year 2020. Status of RaCP and relevant issues are still in progress and waiting for RSPO feedback.	Comply

Appendix C: GHG Reporting Executive Summary

The GHG emissions that were produced in **2018** for **Ukui II 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 **2018** for **Ukui II POM** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	0.7
PKO	0.7

Extraction	%
OER	21.10
KER	5.49

Production	t/yr
FFB Process	297,993
CPO Produced	62,869
PK Produced	16,351

Land Use	Ha
OP Planted Area	12,798.28
OP Planted on peat	0
Conservation (forested)	121.74
Conservation (non-forested)	0
Total	12,920.02

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	0	0	0	0	0	0	0	0
CO ₂ Emission from fertilizer	3,453.04	0.02	2,542.35	0.02	0	0	5,995.39	0.04
NO ₂ Emission	5,256.08	0.03	2,656.85	0.02	0	0	7,912.93	0.05
Fuel Consumption	1,429.04	0.01	410.47	0	0	0	1,839.51	0.01
Peat Oxidation	0	0	0	0	0	0	0	0
Sink								
Crop Sequestration	0	0	0	0	0	0	0	0
Conservation Sequestration	0	0	0	0	0	0	0	0
Total	10,138.16	0.06	5,609.67	0.04	0	0	15,747.83	0.1

**Note: Includes both estates and smallholders*

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	50,802.88	0.17
Fuel Consumption	515.03	0
Grid Electricity Utilization	0	0
Credit		
Export of Grid Electricity	-240.68	0
Sales of PKS	-11,314.60	-0.04
Sales of EFB	0	0
Total	39,762.63	0.13

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO ₂ e
PK from own mill	11,457.35
PK from other source	0
Fuel Consumptions	0
Total Crusher emissions	0

*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 D: Supply Chain Declaration

A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	Month - Year	Volume of FFB from certified supply bases (mt)	Volume of FFB from uncertified supply bases (mt)	Total FFB/Month (mt)
1	December 2018	26,120.078	0	26,120.078
2	January 2019	26,014.56	0	26,014.56
3	February 2019	23,837.41	0	23,837.41
4	March 2019	22,873.78	0	22,873.78
5	April 2019	22,733.31	0	22,733.31
6	May 2019	21,693.59	0	21,693.59
7	June 2019	24,207.11	0	24,207.11
8	July 2019	24,695.87	0	24,695.87
9	August 2019	21,986.32	0	21,986.32
10	September 2019	25,164.93	0	25,164.93
11	October 2019	26,054.66	0	26,054.66
12	November 2019	22,553.70	0	22,553.70
	TOTAL	287,935.33	0	287,935.33

Note:

B. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1	December 2018	5,515.89	1,408.02
2	January 2019	5,660.09	1,440.17
3	February 2019	5,130.32	1,299.72
4	March 2019	4,887.35	1,282.53
5	April 2019	4,832.37	1,283.39
6	May 2019	4,528.97	1,210.05
7	June 2019	5,015.31	1,307.11
8	July 2019	5,136.44	1,360.20
9	August 2019	4,781.57	1,233.39
10	September 2019	5,394.38	1,419.55
11	October 2019	5,415.11	1,487.09
12	November 2019	4,851.17	1,288.19

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TOTAL	61,148.97	16,019.41
Note:		

C. Records of Certified CPO & PK Sold under PalmTrace to Buyers since the last audit (if any)					
No.	Month-Year	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
1	Dec-18	PT. Inti Indosawit Subur – KCP Ukui	TR-3824bc3d-177d	0	1,357.26
		PT. Sari Dumai Sejati	TR-2325975c-9568	2,000	0
		PT. Sari Dumai Sejati	TR-55992c9c-f9b4	299.95	0
		PT. Sari Dumai Sejati	TR-18fb6a01-0eb9	1,000	0
2	Jan-19	PT. Inti Indosawit Subur – KCP Ukui	TR-40b2ef5a-0b49	0	1,411.20
		PT. Sari Dumai Sejati	TR-846cb34e-b20b	0	190.55
3	Feb-19	PT. Inti Indosawit Subur – KCP Ukui	TR-2aab5c20-9c0a	0	1,130.34
		PT. Sari Dumai Sejati	TR-0fe253b1-b3fd	50	
		PT. Sari Dumai Sejati	TR-90a8c2b8-749a	1,649.90	
		PT. Sari Dumai Sejati	TR-bfa64705-8716	2,488.51	
4	Mar-19	PT. Sari Dumai Sejati	TR-8b37eb26-3d3b	1,500	0
		PT. Sari Dumai Sejati	TR-acaeae62-6e33	1,000	
		PT. Sari Dumai Sejati	TR-a1a0c5e1-620d	1,499.88	
5	Apr-19	PT. Inti Indosawit Subur – KCP Ukui	TR-0e566584-8094	0	2,636.52
6	May-19	PT. Inti Indosawit Subur – KCP Ukui	TR-bb975b15-d1c9	0	996.45
		PT. Sari Dumai Sejati	TR-f0eb18a3-488a	1,000	
		PT. Sari Dumai Sejati	TR-b16db838-1e46	1,500	
7	Jun-19	PT. Inti Indosawit Subur – KCP Ukui	TR-e9a3e00c-c624	0	1,105.24
		PT. Sari Dumai Sejati	TR-7e32f912-6a4d	1,500	
		PT. Sari Dumai Sejati	TR-3d4f5e1a-204f	1,000	
		PT. Sari Dumai Sejati	TR-dab3115f-31af	374.97	
		PT. Sari Dumai Sejati	TR-7cd39b9b-0dee	999.91	
8	Jul-19	PT. Inti Indosawit Subur – KCP Ukui	TR-d7545429-d206	0	1,495.92
9	Aug-19	PT. Inti Indosawit Subur – KCP Ukui	TR-2326033f-a735	0	1,752.91

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10	Sep-19	PT. Inti Indosawit Subur – KCP Ukui	TR-40fa737e-bea8	0	1,000.25
11	Oct-19	PT. Inti Indosawit Subur – KCP Ukui	TR-0f5f2157-151b	0	1,572.34
		PT. Sari Dumai Sejati	TR-5b4e5da6-3a2d	99.91	
		PT. Sari Dumai Sejati	TR-ea36dfd6-59a4	2,000	
		PT. Sari Dumai Sejati	TR-a7befd4e-8da3	999.84	
12	Nov-19		0		0
TOTAL				20,962.87	14,648.98

Note:

D. Records of CPO & PK Sold under other schemes to Buyers since the last audit (if any)

No.	Month-Year	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
1	Dec-18	Classified	ISCC	5,042.27	0
2	Jan-19	Classified	ISCC	5,699.59	0
3	Feb-19	Classified	ISCC	1,880.41	0
4	Mar-19	Classified	ISCC	1,557.71	0
5	Apr-19	Classified	ISCC	5,242.27	0
6	May-19	Classified	ISCC	1,189.70	0
7	Jun-19	Classified	ISCC	1,069.96	0
8	Jul-19	Classified	ISCC	4,891.05	0
9	Aug-19	Classified	ISCC	4,078.98	0
10	Sep-19	Classified	ISCC	4,324.25	0
11	Oct-19	Classified	ISCC	1,384.04	0
12	Nov-19	Classified	ISCC	3,119.10	0
TOTAL				39,479.33	0

Note:

E. Records of CPO & PK Sold as conventional to Buyers since the last audit (if any)

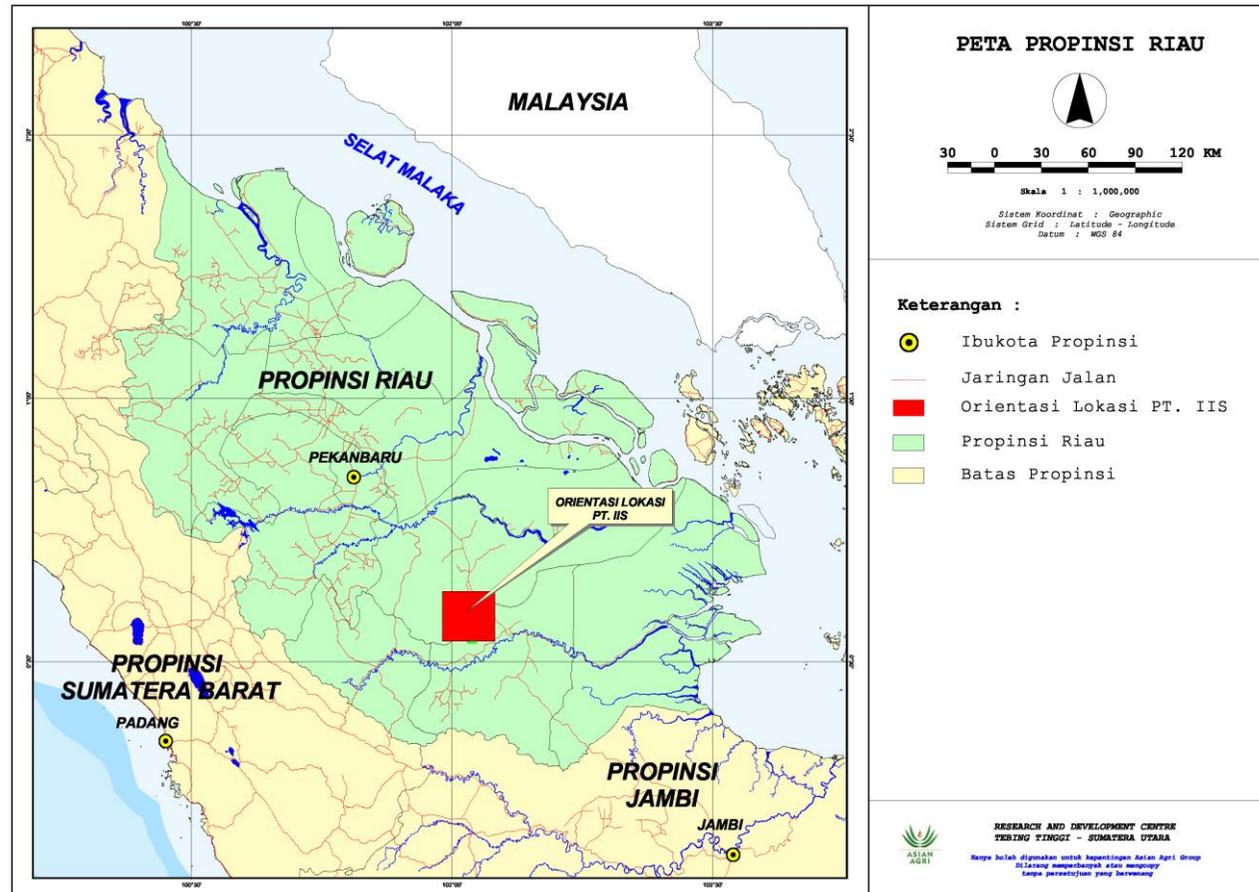
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)
1	None	None	None

Note:

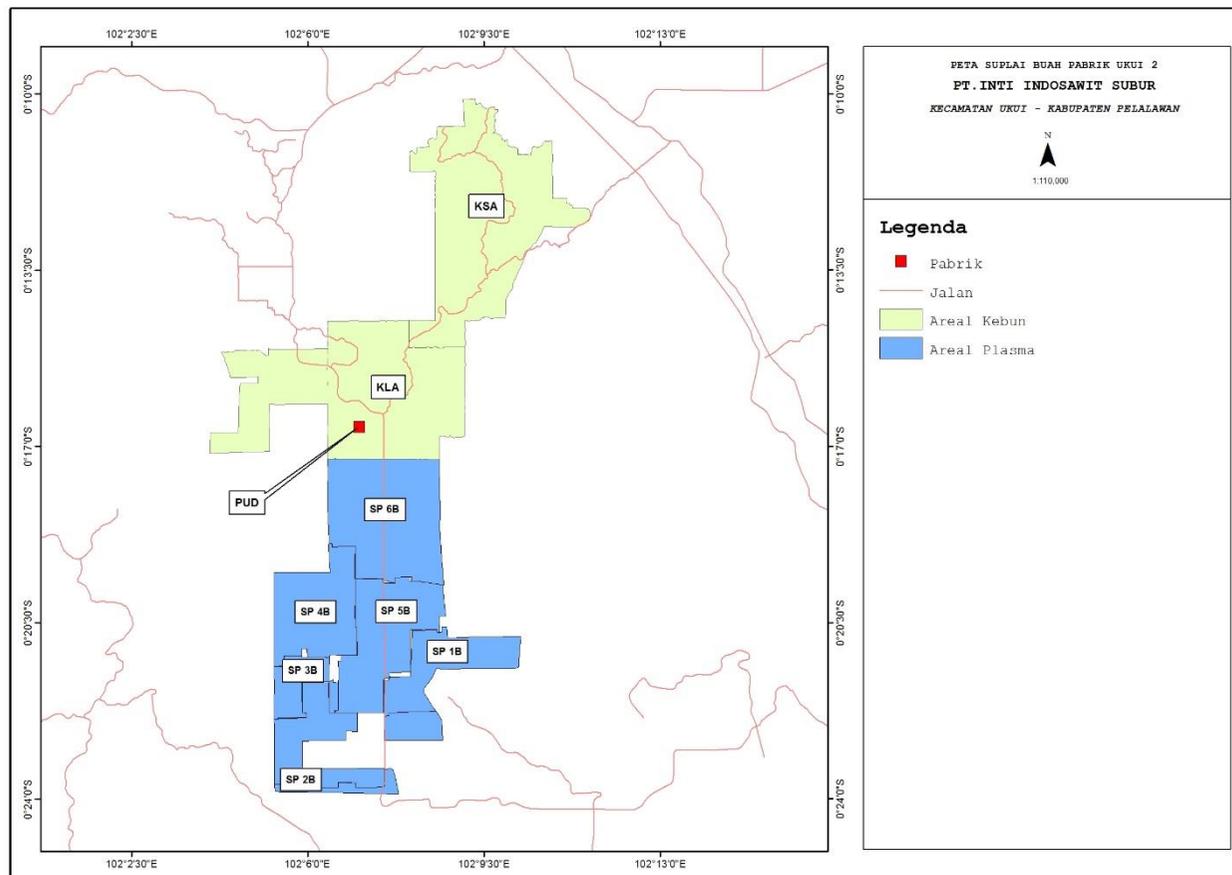
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F. Records of Certified CPO Sold under RSPO Credits to Buyers since the last audit (if any)			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold (mt)
1	None	None	None
Note:			

Appendix E: Location Map of Certification Unit and Supply bases



Appendix F: Estate Field Map



Appendix G: List of Smallholder Sampled

SP	HAMP	NO KAPLING	PEMILIK AWAL	NAMA PEMILIK / PENGELOLA SEKARANG	DESA/KELURAHAN	KECAMATAN	KABUPATEN	LUAS (HA)	KUD
3B	248	5654	DJUMAR	DJUMAR	TASIK JUANG	LUBUK BATU JAYA	INDRAGIRI HULU	2	MEKAR ABADI
3B	249	5655	U D E N	U D E N	TASIK JUANG	LUBUK BATU JAYA	INDRAGIRI HULU	2	MEKAR ABADI
3B	249	5666	HARI WARDANA	SUPINO	TASIK JUANG	LUBUK BATU JAYA	INDRAGIRI HULU	2	MEKAR ABADI
3B	249	5668	MUNARJA/SARMAN	KHATINI	TASIK JUANG	LUBUK BATU JAYA	INDRAGIRI HULU	2	MEKAR ABADI
3B	249	5669	GUTOMO	GUTOMO	TASIK JUANG	LUBUK BATU JAYA	INDRAGIRI HULU	2	MEKAR ABADI
3B	249	5673	ALI MACHFUD	CHASAN	TASIK JUANG	LUBUK BATU JAYA	INDRAGIRI HULU	2	MEKAR ABADI
3B	249	5679	SOCHIB	SOCHIB	TASIK JUANG	LUBUK BATU JAYA	INDRAGIRI HULU	2	MEKAR ABADI
3B	249	5680	SAIUN MABRURI	SAIUN	TASIK JUANG	LUBUK BATU JAYA	INDRAGIRI HULU	2	MEKAR ABADI
3B	249	5681	F.FAOZI	KADAM	TASIK JUANG	LUBUK BATU JAYA	INDRAGIRI HULU	2	MEKAR ABADI
3B	249	5682	R A J I	MUJIONO KESOT	TASIK JUANG	LUBUK BATU JAYA	INDRAGIRI HULU	2	MEKAR ABADI
3B	249	5683	SUTRIONO/SIMIN	SRI SURYATI	TASIK JUANG	LUBUK BATU JAYA	INDRAGIRI HULU	2	MEKAR ABADI
3B	249	5684	NUROCHMAN	JOKO P D	TASIK JUANG	LUBUK BATU JAYA	INDRAGIRI HULU	2	MEKAR ABADI
3B	249	5685	JAMROH	JAMROH	TASIK JUANG	LUBUK BATU JAYA	INDRAGIRI HULU	2	MEKAR ABADI
3B	249	5686	HENDRO PRAYOTNO	SUNARKO	TASIK JUANG	LUBUK BATU JAYA	INDRAGIRI HULU	2	MEKAR ABADI
4B	216	3750	N U S A N	N U S A N	PONTIAN MEKAR	LUBUK BATU JAYA	INDRAGIRI HULU	2	TRANI MAJU
4B	216	3751	J A M I N	BASORI	PONTIAN MEKAR	LUBUK BATU JAYA	INDRAGIRI HULU	2	TRANI MAJU
4B	216	3752	SUJIRAN	SUJIRAN	PONTIAN MEKAR	LUBUK BATU JAYA	INDRAGIRI HULU	2	TRANI MAJU
4B	216	3753	MAHYUDIN	ROMADHON ASHARI	PONTIAN MEKAR	LUBUK BATU JAYA	INDRAGIRI HULU	2	TRANI MAJU
4B	216	3754	K A S D I	MUNTHE	PONTIAN MEKAR	LUBUK BATU JAYA	INDRAGIRI HULU	2	TRANI MAJU
4B	216	3755	ROSIDAN	KASLAN	PONTIAN MEKAR	LUBUK BATU JAYA	INDRAGIRI HULU	2	TRANI MAJU
4B	216	3756	K U S N A	K U S N A	PONTIAN MEKAR	LUBUK BATU JAYA	INDRAGIRI HULU	2	TRANI MAJU
4B	217	3747	KARYONO	JON RODIAN PURBA	PONTIAN MEKAR	LUBUK BATU JAYA	INDRAGIRI HULU	2	TRANI MAJU
4B	217	3748	KASIDIARTO	KASIDIARTO	PONTIAN MEKAR	LUBUK BATU JAYA	INDRAGIRI HULU	2	TRANI MAJU
4B	217	3830	H E R M A N	SALIWON	PONTIAN MEKAR	LUBUK BATU JAYA	INDRAGIRI HULU	2	TRANI MAJU
4B	217	3831	SUPARDI SUTAN LANA	EDI SISWONO	PONTIAN MEKAR	LUBUK BATU JAYA	INDRAGIRI HULU	2	TRANI MAJU
4B	217	3832	HARUN HIDAYAT	HARUN HIDAYAT	PONTIAN MEKAR	LUBUK BATU JAYA	INDRAGIRI HULU	2	TRANI MAJU
4B	217	3833	SUPRAPTO	SUPRAPTO	PONTIAN MEKAR	LUBUK BATU JAYA	INDRAGIRI HULU	2	TRANI MAJU
4B	217	3834	SUPARDI	SUPARDI	PONTIAN MEKAR	LUBUK BATU JAYA	INDRAGIRI HULU	2	TRANI MAJU
4B	217	3835	SAMURI	SAMURI	PONTIAN MEKAR	LUBUK BATU JAYA	INDRAGIRI HULU	2	TRANI MAJU
4B	217	3961	BAMBANG ENDRO WAHYONO	BAMBANG ENDRO WAHYONO	PONTIAN MEKAR	LUBUK BATU JAYA	INDRAGIRI HULU	2	TRANI MAJU
4B	218	3825	K A R D I	SUPRAPTO	PONTIAN MEKAR	LUBUK BATU JAYA	INDRAGIRI HULU	2	TRANI MAJU
4B	218	3826	L A M A T	YONO	PONTIAN MEKAR	LUBUK BATU JAYA	INDRAGIRI HULU	2	TRANI MAJU
6B	156	3261	SUGINO	SUGINO	AIR PUTIH	LUBUK BATU JAYA	INDRAGIRI HULU	2	USAHA TANI
6B	160	2847	DARWIN GURUSINGA	DARWIN GURUSINGA	AIR PUTIH	LUBUK BATU JAYA	INDRAGIRI HULU	2	USAHA TANI
6B	160	2845	BASIR/PIA	BASIR/PIA	AIR PUTIH	LUBUK BATU JAYA	INDRAGIRI HULU	2	USAHA TANI
6B	160	2846	SUROWO	SUROWO	AIR PUTIH	LUBUK BATU JAYA	INDRAGIRI HULU	2	USAHA TANI
6B	160	2830	ABDUL MULYONO	ABDUL MULYONO	AIR PUTIH	LUBUK BATU JAYA	INDRAGIRI HULU	2	USAHA TANI
6B	160	2834	MAMAT NURAHMAT	JUNAEDI SUSANTO B	AIR PUTIH	LUBUK BATU JAYA	INDRAGIRI HULU	2	USAHA TANI
6B	161	2906	SUMIATI	SUMIATI	AIR PUTIH	LUBUK BATU JAYA	INDRAGIRI HULU	2	USAHA TANI
6B	161	2905	ZAKUP	ZAKUP	AIR PUTIH	LUBUK BATU JAYA	INDRAGIRI HULU	2	USAHA TANI
6B	161	2852	RUSLI	RUSLI	AIR PUTIH	LUBUK BATU JAYA	INDRAGIRI HULU	2	USAHA TANI
6B	161	2850	SAMURI	LIAH	AIR PUTIH	LUBUK BATU JAYA	INDRAGIRI HULU	2	USAHA TANI
6B	161	2823	MUSA	MUSA	AIR PUTIH	LUBUK BATU JAYA	INDRAGIRI HULU	2	USAHA TANI
6B	174	3295	MAMAN	MAMAN	AIR PUTIH	LUBUK BATU JAYA	INDRAGIRI HULU	2	USAHA TANI
6B	174	3298	SUKIMIN	MISKUN	AIR PUTIH	LUBUK BATU JAYA	INDRAGIRI HULU	2	USAHA TANI
6B	174	3296	ZAINUDIN	TUMBAK SITANGGANG	AIR PUTIH	LUBUK BATU JAYA	INDRAGIRI HULU	2	USAHA TANI
6B	174	3299	JON HARTO	MULER SIDABUTAR	AIR PUTIH	LUBUK BATU JAYA	INDRAGIRI HULU	2	USAHA TANI
6B	174	3297	MAHMUDDIN	SUJUD	AIR PUTIH	LUBUK BATU JAYA	INDRAGIRI HULU	2	USAHA TANI
6B	177	3387	SAPE'I	SAPE'I	AIR PUTIH	LUBUK BATU JAYA	INDRAGIRI HULU	2	USAHA TANI
6B	177	3347	K A R D I	SITUMEANG	AIR PUTIH	LUBUK BATU JAYA	INDRAGIRI HULU	2	USAHA TANI
6B	177	3383	SALMAN SUNARTO	SALMAN SUNARTO	AIR PUTIH	LUBUK BATU JAYA	INDRAGIRI HULU	2	USAHA TANI
6B	177	3384	SANTOSO B	SANTOSO B	AIR PUTIH	LUBUK BATU JAYA	INDRAGIRI HULU	2	USAHA TANI
6B	177	3346	DARMO WIJAYA	DARMO WIJAYA	AIR PUTIH	LUBUK BATU JAYA	INDRAGIRI HULU	2	USAHA TANI

Appendix H: 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
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
VA	Visit Agronomy
VE	Visit Engineering