

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

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

Client Company name (Parent Company): PT Inti Indosawit Subur
Client company Address: Jl. MH. Thamrin No.31 Jakarta 10230, Indonesia
Certification Unit: PT Inti Indosawit Subur – Buatan II
Location of Certification Unit: Delik & Pangkalan Village, Bunut Langgam District, Pelalawan Regency, Riau Province, Indonesia
Date of Final Report: 12/08/2021

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Section 1: Scope of the Assessment

1. Company Details			
Parent Company	PT Inti Indosawit Subur		
RSPO Membership Number	1-0022-06-000-00	Membership Approval Date	6/02/2006
Address	Head Office: Jl. MH. Thamrin No.31 Jakarta 10230, Indonesia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Buatan II Palm Oil Mill		
Location / Address	Delik & Pangkalan Village, Bunut Langgam District, Pelalawan Regency, Riau Province, Indonesia		
Website	www.asianagri.co.id		
Management Representative	Mr. Ivan Novrizaldie	E-mail	ivan_novrizaldie@asianagri.com
Telephone	+62 21 230 1119	Facsimile	+62 21 230 1120

2. Certification Information			
Certificate Number	RSPO 638947	Certificate Start Date	12/08/2021
Date of First Certification	16/09/2010	Certificate Expiry Date	11/08/2026
Scope of Certification	Production of Palm Oil and Palm Kernel <i>*note: Buatan Estate (Division IV, V and VI) and starting 1 Jan 2019 changes name to Simpang Perak Estate)</i>		
Visit Objectives	<ul style="list-style-type: none"> • Determination of the conformity of the client's management system, or parts of it, with audit criteria. • Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements. 		
Assessment Cycle	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input type="checkbox"/> Annual Surveillance Assessment (ASA Choose an item.) <input checked="" type="checkbox"/> Recertification Assessment (RA 2) <input type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input type="checkbox"/> Choose an item. <input checked="" type="checkbox"/> Indonesia National Interpretation 2020 for RSPO P&C 2018 for the Production of Sustainable Palm Oil		
Supply Chain Module	<input type="checkbox"/> Identity Preserved; <input checked="" type="checkbox"/> Mass Balance	Mill Capacity	90 tonnes FFB/Hour

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ISH certification Phase	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable
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3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
SGS-ID-ISPO-0032	ISPO	SGS	20 Mar 2024
ID05/65250	ISO 14001:2015	SGS	10 June 2023
EU-ISCC-Cert-DE100-20412021	ISCC	SGS	1 Feb 2022

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Buatan II Palm Oil Mill	Delik & Pangkalan Village, Bunut Langgam District, Pelalawan Regency, Riau	00° 27' 36.0" N	101° 52' 02.5" E
Simpang Perak Estate	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau	00° 25' 46" N 30' 37" N	101° 49' 06" E - 101° 53' 05" E
KKPA Delima Sakti	Kerinci Kanan, Pangkalan Kerinci, Dayun District, Siak & Pelalawan Regency, Riau Province.	00° 27' 52.8" N	101° 57' 29.4" E
KUD Mulus Rahayu	Delima Jaya Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 30' 37.6" N	101° 49' 27.4" E
KUD Bhirawa Bhakti	Buana Bhakti Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 31' 20.1" N	101° 47' 24.7" E
KUD Tani Rukun	Simpang Perak Jaya Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 27' 03.2" N	101° 54' 03.2 E
KUD Kebun Sawit Harapan	Gabung Makmur Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 29' 10.9" N	101° 54' 36.7" E
KUD Buatan Jaya	Jatimulya Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 31' 06.8" N	101° 53' 53" E
KUD Mitra Usaha	Buatan Baru Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 32' 02.1" N	101° 52' 56.1" E
KUD Makarti Sawit	Buana Makmur Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 37' 13.7" N	101° 51' 56.6" E
KUD Bina Mulia	Suka Mulia Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 35' 08.0" N	101° 55' 25.6" E

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5. Description of Supply Base					
New Planting Development	<input checked="" type="checkbox"/> No (no change in total planted area)		<input type="checkbox"/> Yes (please refer to Principle 7 for details)		
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Simpang Perak Estate	3,082	35.4	41.6	3,159	97.56
KKPA Delima Sakti (750 members)	1,490	0	0	1,490	100
KUD Mulus Rahayu (237 members)	702	0	0	702	100
KUD Bhirawa Bhakti (291 members)	984	0	0	984	100
KUD Tani Rukun (293 members)	962	0	0	962	100
KUD Kebun Sawit Harapan (218 members)	800	0	0	800	100
KUD Buatan Jaya (225 members)	860	0	0	860	100
KUD Mitra Usaha (361 members)	1,200	0	0	1,200	100
KUD Makarti Sawit (230 members)	800	0	0	800	100
KUD Bina Mulia (217 members)	872	0	0	872	100
Total	11,752	35.4	41.6	11,829*	99.35

*Reduction of hectarage due to some area has been transferred to be managed by Buatan state

6. Plantings & Cycle							
Estate / Smallholders	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Simpang Perak Estate	502	1,511	-	-	1,069	2,580	502
KKPA Delima Sakti	-	-	1,373	117	-	1,490	-
KUD Mulus Rahayu	310	-	-	4	388	392	310
KUD Bhirawa Bhakti	-	-	-	-	984	984	0
KUD Tani Rukun	-	-	-	462	500	962	-
KUD Kebun Sawit Harapan	-	-	-	344	456	800	-
KUD Buatan Jaya	-	-	-	200	660	860	-
KUD Mitra Usaha	-	-	-	100	1,100	1,200	-
KUD Makarti Sawit	-	-	-	800	-	800	-
KUD Bina Mulia	-	-	-	872	-	872	-
Total (ha)	812	1,511	1,373	2,899	5,157	10,940	812

Note:

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* Planting age 0-3 and 4-10 are replanting.
 **Only Mature area is considered as production area
 *** *Buatan Estate (Division IV, V and VI) and starting 1 Jan 2019 changes name to Simpang Perak Estate)*

7. Summary of Certified Tonnage of FFB (Own Certified Scope)

Estate / Smallholders	Tonnage / year			
	Estimated (Sep 2019 – Aug 2020)	Actual (Aug 2019 – July2020)		Forecast (Aug 2021-July 2022)
		Previous license period (Aug 2019)	Current license period (Sep 2019 – July2020)	
Simpang Perak Estate	47,504	2,030	41,013	52,822
KKPA Delima Sakti	30,618	2,090	22,303	27,695
KUD Mulus Rahayu	3,284	442	6,048	7,602
KUD Bhirawa Bhakti	18,009	1,745	17,770	22,978
KUD Tani Rukun	19,677	1,512	15,733	18,289
KUD Kebun Sawit Harapan	16,603	1,374	14,248	17,717
KUD Buatan Jaya	18,495	1,448	15,882	18,013
KUD Mitra Usaha	29,149	2,021	17,096	20,896
KUD Makarti Sawit	14,986	1,203	11,850	14,485
KUD Bina Mulia	16,100	1,000	8,862	12,465
Sub Total	214,425	185,672		212,962
<i>*Extension for Own Estate and Scheme Smallholder</i>	107,099.21*	126,296**		
Total	321,524.21	311,968		

Note:

**due to Covid 19 pandemic, recertification assessment cannot be done on schedule. To avoid expiration of certificate, management unit propose palmtrace extension.*

*** additional period for August 2020 - February 2021 as per Table 9A.*

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

Estate / Smallholders	Tonnage / year			
	Estimated (Sep 2019 – Aug 2020)	Actual (Aug 2019- July 2020)		Forecast (Aug 2021-July 2022)
		Previous license period (Aug 2019)	Current license period (Sep 2019 – July2020)	

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9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage / year			Forecast (Aug 2021-July 2022)
	Estimated (Sep 2019 – Aug 2020)	Actual (Aug 2019 - July 2020)		
		Previous license period (Aug 2019)	Current license period (Sep 2019 – July2020)	
Third-party suppliers FFB		11,976	85,916	
			40,282*	
Total		138,174		

*Note: * additional period for August 2020 - February 2021 as per Table 9A.*

9A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	Month - Year	Volume of FFB from certified supply base (mt)	Volume of FFB from uncertified supply base (mt)	Total FFB/Month (mt)
1	August 2019	14,866	11,976	26,842
2	September 2019	15,394	16,059	31,453
3	October 2019	14,287	12,472	26,759
4	November 2019	13,021	9,661	22,682
5	December 2019	11,929	9,231	21,160
6	January 2020	14,176	4,526	18,701
7	February 2020	13,928	5,511	19,439
8	March 2020	13,712	4,196	17,908
9	April 2020	17,266	5,682	22,947
10	May 2020	17,828	4,785	22,612
11	June 2020	19,990	6,121	26,111
12	July 2020	19,275	7,672	26,947
13	August 2020	19,900	8,508	28,409
14	September 2020	21,615	6,386	28,002
15	October 2020	18,542	4,920	23,462
16	November 2020	18,855	6,634	25,489

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17	December 2020	17,369	4,823	22,191
18	January 2021	15,317	3,018	18,335
19	February 2021	14,698	5,993	20,691
TOTAL		311,968	138,174	450,142

10. Summary of Certified Tonnage (not applicable for ISS)			
Estimated (Sep 2019 – Aug 2020)	Actual (Aug 2019 - July 2020) *		Forecast (Aug 2021-July 2022)
FFB	FFB		FFB
321,524	<i>Previous license period (Aug 2019)</i>	<i>Current license period (Sep 2019 – July2020)</i>	212,962
	14,866	297,102	
CPO (OER: 23.20%)	CPO (OER: 20.33%)		CPO (OER: 21%)
74,609	3,334	54,168	44,722
PK (KER: 6.26%)	PK (KER: 5.55%)		PK (KER: 5.50%)
20,130	907	14,803	11,713

*Note: * additional period for August 2020 - February 2021 as per Table 10A.*

10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1	August 2019	3,334	907
2	September 2019	3,574	964
3	October 2019	3,392	948
4	November 2019	2,997	841
5	December 2019	2,794	775
6	January 2020	2,835	767
7	February 2020	2,740	753
8	March 2020	2,714	745
9	April 2020	3,362	935
10	May 2020	3,419	959
11	June 2020	3,838	1,082
12	July 2020	3,665	1,041
15	October 2020	3,870	1,072
16	November 2020	4,209	1,158
17	December 2020	3,613	969

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18	January 2021	3,683	907
19	February 2021	3,463	887
TOTAL		57,502	15,710

11. Summary of Actual Volume sold					
Current License period (Sep 2019 – July 2020)*					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	3,223.85	50,544.61	0	0	53,768.46
PK (MT)	14,741.40	0	0	0	14,741.40
Credits	0				0
Previous License period (Aug 2019)					
CPO (MT)	0	2,899.72	0	0	2,899.72
PK (MT)	1,083.49				1,083.49**
Credits	0				0
Note:					
<i>*additional period for August 2020 - February 2021.</i>					
<i>**176.49 MT of PK was carry over from previous period</i>					

11A. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any)				
No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
1	KCP Buatan I	RSPO_PO1000002758	3,223.85	15,824.89
TOTAL			3,223.85	15,824.89

11B. Records of CPO & PK Sold under other schemes since the last audit (if any)				
No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
1.	Classified	ISCC	53,444.33	0
TOTAL			53,444.33	-

11C. Records of CPO & PK Sold as conventional since the last audit (if any)			
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)
	NIL	NIL	NIL

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TOTAL	NIL	NIL

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

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

13. Independent Smallholders Actual Sold Tonnage / Volume						
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	IS-CSPK	IS-CSPKE
Current License period (key in period)						
Credits						
Physical						

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn. Bhd. (ASI Accreditation Number: ASI-ACC-067)
Suite 29.01 Level 29, The Gardens North Tower,
Mid Valley City, Lingkaran Syed Putra,
59200 Kuala Lumpur, Malaysia.
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BSI is a leading global provider of management systems assessment and certification, with more than 92,000 certified locations and clients in over 193 countries. BSI is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (ASI-ACC-067) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia.

2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on **6, 8– 11/03/2021**. The audit programme is included as Section 2.3. Where applicable, prior to the initial certification and recertification audit, 30 days Public Notification was made through the RSPO and BSI website on **9 February 2021** (<https://rspo.org/certification/public-announcement/page/8?>). Due to the COVID-19 pandemic, this assessment involved a partial remote audit as allowed by RSPO Secretariat – RSPO P&C On-site & Remote Audits dated 24th March 2020. The remote audit was conducted on **22 – 23/07/2020**.

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

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. Indonesia National Interpretation 2020 of the RSPO P&C 201 was used as the normative reference to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

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

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

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

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

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

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

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

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Re- certification)	Year 2 (ASA 2_1)	Year 3 (ASA 2_2)	Year 4 (ASA 2_3)	Year 5 (ASA 2_4)
Buatan II Palm Oil Mill	X	X	X	X	X
Simpang Perak Estate	X	X	X	X	X
KKPA Delima Sakti	X	X	X	X	X
KUD Mulus Rahayu	X		X		X
KUD Bhirawa Bhakti	X		X		X
KUD Tani Rukun		X	X		X
KUD Kebun Sawit Harapan	X		X		X
KUD Buatan Jaya	X			X	
KUD Mitra Usaha		X		X	
KUD Makarti Sawit		X		X	
KUD Bina Mulia		X		X	

Tentative Date of Next Visit: August 2, 2021 - August 6, 2021

Total Number of Mandays: 26 Mandays

2.2 BSI Assessment Team

Name	Role	Competency
<p>Andi Pratama Pasaribu</p>	<p>Team Leader</p>	<p>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, Lead Auditor ISO 22000:2018, 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 assessment, he assessed legal, social and best management practices aspect. Fluent in English and Bahasa.</p>
<p>Mujinius Jalaraya</p>	<p>Team Member</p>	<p>He hold Bachelor degree from Faculty of Forestry, Bogor Agricultural University (IPB) in 2008, Majoring in Forest Resources Conservation and Ecotourism. He have a 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 social, conservation and environmental aspects. Fluent in English and Bahasa.</p>
<p>Imam Fakhurozi</p>	<p>Team Member</p>	<p>Imam holds degree in Agriculture Technology and graduated from Gadjah Mada University, Yogyakarta on 2011. He had 2 (two) years working experience related to oil palm industry, as a sustainability and HSE officer in oil palm Plantation Company in Indonesia. Imam has completed a number of relevant trainings, the training includes ISO 9001:2008 and EMS 14001:2004 Lead Auditor, Lead Auditor of SMK3, RSPO P&C Lead auditor endorsed course. Currently he works for BSI Group based in Jakarta office. He is one of the BSI qualified RSPO auditor. He had been involved in RSPO auditing since 2015. During this assessment, he assessed on environment, occupational, safety and health aspects. Fluent in English and Bahasa.</p>
<p>Edy Widodo</p>	<p>Team Member</p>	<p>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 is 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.</p>

		During this assessment, he assessed on social, worker welfare and gathering information from stakeholder (internal and external). Fluent in English and Bahasa.
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Accompanying Persons: NIL

2.3 Assessment Plan

Date	Time	Subjects	MJ	EW	IF	AP
Monday 01/03/2021	07.45 – 09.20	Flight Jakarta – Pekanbaru	√	√	√	√
	09.30 – 11.00	Travel from Pekanbaru to PT IIS – Buatan I & II	√	√	√	√
	12.00 – 14.00	Break	√	√	√	√
	14.00 – 14.30	Opening Meeting Presentation by PT. IIS – Buatan I & II POM, Estate and Smallholder Presentation by BSI Indonesia	√	√	√	√
Saturday 06/03/2021	08.00 – 12.00	Field Visit to Simpang Perak Estate & KKPA Delima Sakti: - Herbicide application programmes, harvesting, fertilizing operations, water management, road maintenance, terracing, HCV's, riparian zones, etc. - Agrochemical stores, Fertilizer store, workshops, housing, landfill, clinic, riparian zones, Hazardous Waste, waste management, etc. - Boundaries inspection, worker interviews, social amenities, etc. - Interview with: Labour Union and Gender Committee.	√	√	√	√
	12.00 – 14.00	Break	√	√	√	√
	14.00 – 17.00	Document Review for Simpang Perak Estate	√	√	√	√
Monday 08/03/2021	08.00 – 12.00	Field Visit to Scheme Smallholder: KUD Mulus Rahayu and KUD Bhirawa Bakti Field visit to Kavling/Block member of Smallholder to verify conformity with RSPO INA NI 2020 Standard, BMP, OHS-EMS Implementation, HCV, Social and Labor, Continual improvement, etc.	√	√	√	√
	12.00 – 14.00	Break	√	√	√	√
	14.00 – 17.00	Document Review for Scheme Smallholder	√	√	√	√
Tuesday 09/03/2021	08.00 – 12.00	Field Visit to Scheme Smallholder: KUD Kebun Sawit Harapan and KUD Buatan Jaya Field visit to Kavling/Block member of Smallholder to verify conformity with RSPO INA NI 2020 Standard, BMP, OHS-EMS Implementation, HCV, Social and Labor, Continual improvement, etc.	√	√	√	√
	12.00 – 14.00	Break	√	√	√	√

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	14.00 – 17.00	Document Review for Scheme Smallholder	√	√	√	√
Wednesday, 10/03/2021	08.00 – 12.00	Document Review for Buatan II POM Field Visit to Buatan II POM: <ul style="list-style-type: none"> • Inspection of processing, warehouse, workshop, mill waste management, Effluent Ponds, OHS, Environment issues, POME application, workers interview, Supply chain for CPO mill, Review on SEIA documents and records, Document review, etc. • Audit Supply Chain for CPO Mills (RSPO SCCS) • Interview workers. 	√	√	√	√
	12.00 – 14.00	Break	√	√	√	√
	14.00 – 17.00	Document Review for Buatan II POM	√	√	√	√
Thursday, 11/03/2021	08.00 – 12.00	Audit continue for Document Review Buatan II POM, Simpang Perak Estate and Scheme Smallholder	√	√	√	√
	12.00 – 14.00	Break	√	√	√	√
	14.00 – 15.00	Closing Meeting Preparation	√	√	√	√
	15.00 – 16.00	Closing Meeting	√	√	√	√

Remote audit assessment plan

Date	Time	Subjects	AP	MJ	IF	EW	ICT Planned
Wed, 22 July 2020	08.00 – 08.30	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) 	√	√	√	√	Video conference meeting using Zoom link.

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Date	Time	Subjects	AP	MJ	IF	EW	ICT Planned
	08.30 – 12.00	Document Review Buatan II POM and Kebun Simpang Perak: <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. 	√	√	√	√	Video conference meeting using Zoom link. Document review using appropriate sharing application such as email, Whatsapp or any other application agreed by auditor and auditee.
	12.00 – 14.00	Lunch Break	√	√	√	√	
	14.00 – 16.30	Document review continuation	√	√	√	√	Video conference meeting using Zoom link. Document review using appropriate sharing application such as email, Whatsapp or any other application agreed by auditor and auditee.
	16.30 – 17.00	Wash up meeting (if needed)	√	√	√	√	

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Date	Time	Subjects	AP	MJ	IF	EW	ICT Planned
Thu, 23 July 2020	08.00 – 12.00	Document Review of Scheme Smallholder: 1. Legal & Land Rights 2. Social and Transparency 3. Environmental, Waste Management & HCV 4. Occupational Health & Safety 5. Best Management Practices 6. Worker Welfare 7. Review of previous assessment findings. Smallholder taken as audit sample: 1. KUD Mulus Rahayu 2. KUD Bhirawa Bhakti 3. KUD Kebun Sawit Harapan 4. KUD Buatan Jaya					Video conference meeting using Zoom link. Document review using appropriate sharing application such as email, Whatsapp or any other application agreed by auditor and auditee.
	12.00 – 14.00	Lunch Break	√	√	√	√	
	16.00 – 17.00	Closing Meeting	√	√	√	√	Video conference meeting using Zoom link.

Section 3: Assessment Findings

3.1 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?	PT Inti Indosawit Subur has explained the certification plan for all of its subsidiaries; indicating all palm oil mills, company-owned estates and scheme smallholder as the supply base.	Complied.
Have all the estates and mills certified within five (5) years after obtaining RSPO membership?	There is remaining mill and estate that has not certified yet, PT Mitra Unggul Pusaka – Segati POM and supply bases. The unit has gone through the RSPO Stage 2 certification audit in 2014, however it was not succeed. The company’s sustainability team has conducted latest RSPO internal audit on 25 – 31 October 2017. Segati Palm Oil Mill (PT Mitra Unggul Pusaka) located in Pelalawan, Riau will planned Re-Audit in year 2018. Status of disclosure PT MUP has been submitted to RSPO by email on 29 November 2017. The latest respond from RSPO received on 23 April 2019 by Biodiversity Manager, stating that RSPO is on review of Annex 3a and all supporting documents.	Complied
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available.	No, there is no new acquisition conducted by PT Inti Indosawit Subur and its subsidiary.	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	Yes, there is time bound plan revision dated 1 January 2019, signed by Management Representative. Justification available, it caused by status of disclosure PT MUP is in progress of review by RSPO. PT MUP will conduct re-audit in 2020.	Complied
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?	Yes, there is time bound plan revision dated 1 January 2019, signed by Management Representative. Justification available, it caused by status of disclosure PT MUP is in progress of review by RSPO. PT MUP will conduct re-audit in 2020.	Complied
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	No	Complied
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of	No	Complied

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the plan? If yes a Major non-compliance shall be raised		
Un-Certified Units or Holdings		
No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12.	<p>Based on Time Bound Plan revised 1 January 2019, PT Mitra Unggul Pusaka – Segati Mill located in Pelalawan, Riau Province postponed to Re-Audit in year 2020. Status of RaCP and relevant issues are still in progress and waiting for RSPO feedback. Company revised the Timeboundplan on June 2021 and the plan for certification is change due to RaCP still under process. According to Land Use change analysis, there are several area conversion from rubber plantation to become palm oil plantation, no primary forest.</p> <p>Latest progress of RaCP based on email correspondence between company and RSPO dated 3 December 2020, confirmed that RSPO has review the concept note and there is a comment to be improved and company has give the feedback and revision of Concept Note on 6 May 2021 and waiting for the review from RSPO secretariat.</p>	Complied
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	<p>PT Mitra Unggul Pusaka – Segati Mill RaCP and relevant issues are still in progress and waiting for RSPO feedback. According to Land Use change analysis, there are several area conversion from rubber plantation to become palm oil plantation, no primary forest.</p> <p>Latest progress of RaCP based on email correspondence between company and RSPO dated 3 December 2020, confirmed that RSPO has review the concept note and there is a comment to be improved and company has give the feedback and revision of Concept Note on 6 May 2021 and waiting for the review from RSPO secretariat.</p>	Complied
Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.	<p>According to internal audit result on December 2020, there is no land conflict occur in PT Mitra Unggul Pusaka – Segati Mill. In addition the company has been certified for ISPO (Indonesian Sustainable Palm Oil) since December 2016.</p> <p>According to the RSPO RaCP tracker (https://www.rspo.org/certification/remediation-and-compensation/racp-tracker), PT Inti Indosawit Subur has:</p> <ul style="list-style-type: none"> • MU's with potential liabilities: 4 unit 	Complied

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	<ul style="list-style-type: none"> • LUCA Submitted: 4 units • LUCA review Completed: 2 unit • Concept Note Required: 4 units • Concept Note Submitted: - • Concept Note Approved: - 	
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	According to internal audit result on December 2020, there is no Labor disputes occur in PT Mitra Unggul Pusaka – Segati Mill. In addition the company has been certified for ISPO (Indonesian Sustainable Palm Oil) since December 2016.	Complied
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	According to internal audit result on December 2020, there is no legal noncompliance occur in PT Mitra Unggul Pusaka – Segati Mill. In addition the company has been certified for ISPO (Indonesian Sustainable Palm Oil) since December 2016.	Complied
Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.	PT Mitra Unggul Pusaka – Segati Mill conduct the internal audit each year. Latest internal audit on December 2020. Report of internal audit are available.	Complied
Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?	According to internal audit result on December 2020, there is no Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates.	Complied
Have there been any stakeholder (including NGO) consultation conducted?	During internal audit December 2020, the stakeholder consultation including NGO cannot be done due to Pandemic Covid-19 circumstances. The stakeholder consultation will be conducted after the normal situation.	Complied

3.2 Progress of scheme smallholders and/or outgrowers

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

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Approved Time Bound Plan

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

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				Inhu Regency, Riau		Re-Certified on 1 March 2016
Ukui II Mill - PT Inti Indosawit Subur	Ukui Village, Ukui District, Pelalawan Regency, Riau		Soga Estate	Ukui Village, Ukui District, Pelalawan Regency, Riau		Certified on 1 March 2011 Re-Certified on 1 March 2016
			Ukui (Plasma)	Ukui & Lubuk Batu Jaya District, Pelalawan & Inhu Regency, Riau		Certified on 1 March 2011 Re-Certified on 1 March 2016
Tungkal Ulu Mill - PT Inti Indosawit Subur	Pulau Pauh / Penyabungan / Merlung Village, Tungkal Ulu District, Tanjung Jabung Regency, Jambi		Tungkal Ulu Estate	Pulau Pauh / Penyabungan / Merlung Village, Tungkal Ulu District, Tanjung Jabung Regency, Jambi		Certified on 15 August 2012 Re-Certification on August 2017
			Tungkal Ulu (Plasma)	Renah Mendalo, Merlung, Muara Papalik District, Tanjung Jabung Barat Regency,		Certified on 15 August 2012 Re-Certification on August 2017
Muara Bulian Mill - PT Inti Indosawit Subur	Singoan / Bukit Sari / Bulian Jaya Village, Muara Bulian / Pemayang District, Batang Hari Regency, Jambi		Muara Bulian Estate	Singoan / Bukit Sari / Bulian Jaya Village, Muara Bulian / Pemayang District, Batang Hari Regency,		Certified on 12 July 2013 Re-Certification on August 2017
			Muara Bulian (Plasma)	Maro Sebo Ilir District, Batanghari Regency, Jambi		Certified on 12 July 2013 Re-Certification on August 2017
Topaz Mill – PT Tunggal Yunus Estate	Petapahan Village, Tapung District, Kampar Regency, Riau		Topaz Estate	Petapahan Village, Tapung District, Kampar Regency, Riau		Certified on 30 March 2015

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Taman Raja Mill – PT Dasa Anugrah Sejati	Lubuk Bernai / Kampung Baru / Pelabuhan Dagang / Pematang Pauh Village, Tungkal Ulu District, Tanjung Jabung Regency, Jambi		Taman Raja, Badang & Bernai Estate*	Lubuk Bernai / Kampung Baru / Pelabuhan Dagang / Pematang Pauh Village, Tungkal Ulu District, Tanjung Jabung Regency, Jambi		Certified on 20 February 2015 *Bernai Estate Split From Taman Raja & Badang Estate Since 1 January 2019
Segati Mill – PT Mitra Unggul Pusaka	Langkan / Penarikan / Tambak / Sotol Village, Langgam District, Pelalawan Regency, Riau		Segati Estate	Langkan / Penarikan / Tambak / Sotol Village, Langgam District, Pelalawan Regency, Riau	Main Audit in 2014	NPP & RaCP is still in Progress Re-Audit 2022 (Waiting for Concept Note)
			Gondai Estate	Pangkalan Sarik / Baru Village, Langgam / Siak Hulu District, Pelalawan / Kampar Regency, Riau	Main Audit in 2014	NPP & RaCP is still in Progress Re-Audit 2022 (Waiting for Concept Note)
Penarikan Mill – PT Mitra Unggul Pusaka	Penarikan Village, Langgam District, Pelalawan Regency, Riau		Penarikan Estate*	Penarikan / Tambak Village, Langgam District, Pelalawan Regency, Riau	Main Audit in 2014	NPP & RaCP is still in Progress Re-Audit 2022 (Waiting for Concept Note)
Tanah Datar Mill – PT Supra Matra Abadi	Tanah Datar Petatal Village, Talawi District, Asahan Regency, North Sumatera		Tanah Datar Estate	Tanah Datar Petatal Village, Talawi District, Asahan Regency, North Sumatera		Certified on 18 May 2015
			Bahilang Estate	Bahilang Village, Tebing Tinggi District, Serdang	2022	*Bahilang Estate On Process RaCP (Recertification 2020)

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				Bedagai Regency, North Sumatra		
Aek Nabara Mill – PT Supra Matra Abadi	S1-S3 / Sukadame Village, Bilah Hulu / Kota Pinang District, Labuhan Batu Regency, North Sumatra		Aek Nabara Estate	S1-S3 / Sukadame Village, Bilah Hulu / Kota Pinang District, Labuhan Batu Regency, North Sumatra		Certified on 6 March 2015
Teluk Panjie Mill – PT Supra Matra Abadi	Teluk Panjie Village, Kampung Rakyat District, Labuhan Batu Regency, North Sumatra		Teluk Panjie Estate (3,885 Ha)	Teluk Panjie Village, Kampung Rakyat District, Labuhan Batu Regency, North Sumatra		Certified on 21 April 2015
			Teluk Panjie Estate (801 Ha)		2022	HGU is still in Process
Peranap Mill – PT Rigunas Agri Utama	Simelinyang / Pauh Ranap / Sengkilo Village, Peranap District, Indragiri Hulu Regency, Riau		Peranap Estate	Simelinyang / Pauh Ranap / Sengkilo Village, Peranap District, Indragiri Hulu Regency, Riau		Certified on 7 January 2015
			Peranap (Plasma)			Certified on 18 August 2016
Bungo Tebo Mill – PT Rigunas Agri Utama	Tuo Sumai / Sungai Rambai Village, PWK Sumai / Tebo Ulu District, Bungo Tebo Regency, Jambi		Bungo Tebo Estate	Tuo Sumai / Sungai Rambai Village, PWK Sumai / Tebo Ulu District, Bungo Tebo Regency, Jambi		Certified on 3 December 2015
			Bungo Tebo (Plasma)			Certified on 7 February 2017
Tanjung Selamat Mill – PT Indo Sepadan Jaya	Kampung Padang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra		Tanjung Selamat	Kampung Padang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra		Certified on 26 May 2015
			Pangkatan	Sennah Village, Bilah Hilir District, Labuhan Batu		Certified on 26 May 2015

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				Regency, North Sumatra		
Gunung Melayu I – PT Saudara Sejati Luhur	Rahuning Village, Bandar Pulau District, Asahan Regency, North Sumatra		Pulau Maria Estate	Rahuning Village, Bandar Pulau District, Asahan Regency, North Sumatra		Certified on 7 September 2015
Gunung Melayu II – PT Gunung Melayu	Gonting Malaha Village, Bandar Pulau District, Asahan Regency, North Sumatra		Aek Tarum & Batu Anam Estate	Gonting Malaha Village, Bandar Pulau District, Asahan Regency, North Sumatra		Certified on 8 July 2015
			Sentral Estate		2022	*Sentral Estate On Process RaCP (Recertification 2020)
Negri Lama II Mill – PT Hari Sawit Jaya	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra		Negri Lama	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra		<ul style="list-style-type: none"> • Certified on 23 December 2016 as Independent Mill • Audit in 2016 as Mill and Supply Base
			Aek Kuo (2,088 Ha)	Aek Korsik Village, Aek Natas District, Labuhan Batu Regency, North Sumatra		HGU Complete Audit at ASA 3 (2018)
			Aek Kuo (501 Ha)			
Negri Lama I Mill – PT Hari Sawit Jaya	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra		*3rd party which is excluded from scope of certification	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra		<ul style="list-style-type: none"> • Certified on 8 April 2015 • Audit in 2016 as Independent Mill

3.3 Details of Nonconformities

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

During this Assessment there were **4 (four) critical (remote)** and **2 (two) Minor (onsite)** nonconformities raised. The Buatan 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 Critical Nonconformity(ies) has been verified for its effectiveness and closed accordingly. The below is the summary of the non-conformity raised during this assessment.

Non-conformity			
NCR Ref #	2032041-202103-N1	Date Issued	11/03/2021
Due Date	Until next assessment	Date of nonconformity Closure	Open
Clause & Category (Critical / Minor)	6.2.7 (Minor)		
Statement of Nonconformity:	Based on document verification and interview with some employees, management unit used non-permanent/daily workers for the core work (92 harvester) and 12 mill operators in Buatan II POM. This is not accordance with RSPO requirements related to permanent and full-time employment in palm oil plantation.		
Requirement Reference:	Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.		
Objective Evidence:	<p>Management unit has identified the core work in oil palm plantations Based on Circular Letter from GAPKI No. 073/GAPKI/II/2013 dated 8 February 2013 concerning Circular for the Flow of Work Implementation Process Activities in the Oil Palm Plantation Business Sector, stating that; only 2 (two) jobs that are the main activities in the Oil Palm Plantation industry, namely harvesting and product processing activities.</p> <p>Based on employee’s master of Simpang Perak Estate period December 2020 verification obtained information as follows:</p> <ul style="list-style-type: none"> • Harvester from period 2010-2015: 12 harvesters • Harvester from period 2016-2019: 57 harvesters • Addition of harvester in 2020: 23 harvesters <p>Total: 92 harvesters</p> <p>There was only one Promotion of PHL (Daily workers) to SKU (permanent workers) in 2021 on behalf of harvester Radot Butar Butar (refer to memorandum No. 004/HR-RO2/MEMO/SK/01/2021 dated 30 January 2021).</p> <p>Buatan 2 POM: There is a record of mill operator as per December 2020:</p>		

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	<ul style="list-style-type: none"> Worker from period 2011-2015: 6 workers Worker from period 2016-2020: 6 workers <p>Total: 12 workers</p>
Corrections:	Propose, evaluate and monitor the process of hiring employees for stage 1 and stage 2, in accordance with the 2021 program
Root Cause Analysis:	The unit's employment conditions and the limitations of the unit human resources department to appointed casual worker to be as permanent worker
Corrective Actions:	<ol style="list-style-type: none"> 1. Make an internal memo regarding core workers under 2018 2. Create a gradual employee recruitment program for 2021 - 2026 3. Monitor and evaluate the annual appointment program
Assessment Conclusion:	The audit team has approved the corrective action plan. Its implementation will be verified at the next assessment.

Non-conformity			
NCR Ref #	2032041-202103-N2	Date Issued	11/03/2021
Due Date	Until next assessment	Date of nonconformity Closure	Open
Clause & Category (Critical / Minor)	7.3.2 (Minor)		
Statement of Nonconformity:	The handling of hazardous waste is inconsistent with the procedure to handle hazardous waste titled "Prosedur Penanganan Limbah B3" No. AA-KL-06-EFP explains methods to collecting the waste, recording in balance and disposal through licensed third-party transporter		
Requirement Reference:	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.		
Objective Evidence:	Based on a field visit at Buatan II POM (dated 5th March 2021), the auditor team found empty containers of hazardous material in the scrap yard (total 3 items), this was not in accordance with the procedure to handle hazardous waste titled "Prosedur Penanganan Limbah B3" No.AA-KL-06-EFP explains methods to collecting the waste, recording in balance and disposal through licensed third party transporter.		
Corrections:	Installing a signboard in the form of a prohibition on disposing of scheduled waste carelessly		
Root Cause Analysis:	Lack of awareness and understanding of units in managing scheduled waste in the work environment.		
Corrective Actions:	Provide socialization to workers and staff regarding the understanding of scheduled waste and waste sorting in the work environment on a regular basis		
Assessment Conclusion:	The audit team has approved the corrective action plan. Its implementation will be verified at the next assessment.		

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Opportunity for Improvements	
OFI #	Description
OFI 1	-

Positive Findings	
PF #	Description
PF 1	Certificate holder has had the smallholder scheme that give positive impact for local economic.

Non-conformity			
NCR Ref #	1937028-202007-M1	Clause & Category (Critical (Major) / Minor)	Critical (Major)
Date Issued	23 July 2020	Due Date	22 October 2020
Closed (Yes / No)	Yes	Date of nonconformity Closure	17 October 2020
Statement of Nonconformity:	Internal audit 2020 has been conducted on 2- 5 June 2020 by Internal Auditor, however the internal audit findings were not appropriate and the evidence of follow up action cannot be demonstrated.		
Requirement Reference:	<p>RSPO INA NI 2020 Indicator 3.8.6</p> <p>Internal Audit</p> <ul style="list-style-type: none"> i. The mill shall have a written procedure to conduct annual internal audit to determine whether the mill; <ul style="list-style-type: none"> a) Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. b) Effectively implements and maintains the standard requirements within its organization. ii. Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports. 		
Objective Evidence:	<p>PT. Inti Indosawit Subur – Buatan II POM has a procedure to conduct internal audit RSPO, including RSPO SCCS as per Procedure of Traceability (AA-MPM-OP-1400.17-R7) chapter 6.7. Internal audit conducted twice a year.</p> <p>Latest internal audit has been conducted on 2- 5 June 2020 by Internal Auditor, internal audit report were evident in Module E report, however the internal audit findings were regarding the shipping announcement of CPKO which is not related to mill instead KCP. In addition there is no evidence of correction and corrective action done to close the issue.</p>		

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Corrections:	<p>Revision for internal audit report of RSPO SCCS has been made on 28 August 2020. Internal audit findings were adjusted to Buatan II Palm Oil Mill and correct the typo error of KCP. Report amendment can be demonstrated during audit.</p> <p>Based on the results of the verification of the internal audit report, it can be shown that the report is appropriate, and the checklist used was the latest audit checklist according to RSPO P&C 2018, INA NI 2020.</p> <p>Audit findings, root cause analysis, correction and corrective action and its evidence can be shown in the report of internal audit.</p>
Root Cause Analysis:	Lack of understanding of the internal auditor team regarding the latest audit checklist used for internal audit of the RSPO SCCS Buatan II POM.
Corrective Actions:	<p>Internal Audit Manager has carried out the refreshment training for internal audit team on 11 September 2020 by online training. Evidence of training can be demonstrated as per Zoom Meeting record dated 11 September 2020. Training material and minutes of training are available and verified.</p> <p>Internal audit department has made the improvement plan to address the internal audit issue and to enhance the internal audit performance. Improvement plan present as per "IMPROVEMENT PLAN INTERNAL AUDIT RSPO SCCS Tahun 2020". Improvement plan are including: Refreshment training plan, Internal audit procedure review, Pilot project of internal audit improvement process, review the external audit as the reference.</p>
Assessment Conclusion:	<p>Based on the corrective action above, these NC can be closed.</p> <p>The effective implementation will be verifying during onsite audit.</p> <p>During the onsite audit, auditor team has verified the internal audit supply chain. The record of follow up has been documented. Based on that fact, this noncompliance satisfactorily closed.</p>

Non-conformity			
NCR Ref #	1937028-202007-M2	Clause & Category (Critical (Major) / Minor)	Critical (Major)
Date Issued	23 July 2020	Due Date	22 October 2020
Closed (Yes / No)	Yes	Date of nonconformity Closure	17 October 2020
Statement of Nonconformity:	<p>According to transaction record in Palmtrace and Book Keeping record confirmed that there were 3 transaction record with shipping announcement in the RSPO IT Platform made more than 3 month after Bill of Lading, i.e:</p> <ul style="list-style-type: none"> • BL date CSPK to Buatan I KCP dated 29/02/2020, volume 822.57 MT, Shipping announcement was made on 09/07/2020 		

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	<ul style="list-style-type: none"> • BL date CSPK to Buatan I KCP dated 29/02/2020, volume 822.57 MT, Shipping announcement was made on 09/07/2020 • BL date CSPK to Buatan I KCP dated 31/03/2020, volume 747.95 MT, Shipping announcement was made on 09/07/2020
<p>Requirement Reference:</p>	<p>RSPO INA NI 2020 Indicator 3.8.16 Registration of Transactions</p> <ol style="list-style-type: none"> i. Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date. ii. Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.
<p>Objective Evidence:</p>	<p>Transaction record in Palmtrace and Book Keeping record 2019/2020 confirmed that there were 3 transaction record with shipping announcement in the RSPO IT Platform made more than 3 month after Bill of Lading, i.e:</p> <ul style="list-style-type: none"> • BL date CSPK to Buatan I KCP dated 29/02/2020, volume 822.57 MT, Shipping announcement was made on 09/07/2020 • BL date CSPK to Buatan I KCP dated 29/02/2020, volume 822.57 MT, Shipping announcement was made on 09/07/2020 • BL date CSPK to Buatan I KCP dated 31/03/2020, volume 747.95 MT, Shipping announcement was made on 09/07/2020
<p>Corrections:</p>	<p>Buatan II POM has made an update and internal coordination regarding the implementation of RSPO SCCS standards for Palm Oil Mill that the shipping announcement must be made a maximum of 3 months after the delivery transaction/BL date is made. Internal coordination between sustainability department, purchasing and palm Oil Mill unit can be demonstrated through email correspondence.</p> <p>Shipping announcements after July 2020 are made maximum of 3 months after the transaction. The following is an example of the shipping announcement that has been made for CSPK:</p> <ul style="list-style-type: none"> • Transaction ID # TR-f0b4300c-244d, Product name: CSPK, Seller: PT Inti Indosawit Subur - Buatan II (RSPO_PO1000000382), Buyer: PT Inti Indosawit Subur - Buatan I KCP (RSPO_PO1000002758), Shipping/BL Date: 31/07/2020, Confirmation Date (Shipping announcement): 21/10/2020, Volume: 962.92 MT. • Transaction ID # TR-f3b6de19-360c, Product name: CSPK, Seller: PT Inti Indosawit Subur - Buatan II (RSPO_PO1000000382), Buyer: PT Inti Indosawit Subur - Buatan I KCP (RSPO_PO1000002758), Shipping/BL Date: 31/08/2020, Confirmation Date (Shipping announcement): 21/10/2020, Volume: 917,92 MT. <p>From above shipping announcement can be demonstrated that Shipping announcement are made not more than 3 month after shipping/BL date.</p>

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Root Cause Analysis:	PICs that make the shipping announcement do not update regarding the latest RSPO SCCS requirements for Palm Oil Mill that the PKS shipping announcement must be made a maximum of 3 months after dispatch/Bill of Lading date.
Corrective Actions:	<p>Certificate holder has made the form of monitoring indicated the CSPK produce and delivery by Buatan II POM to buyer (KCP or other party). Monitoring of CSPK production and delivery are made each month as a reference for the shipping announcements made by PIC (Jakarta Office). Monitoring form since July 2020 - October 2020 can be demonstrated during audit.</p> <p>Shipping announcements are made based on SOP AA-SM-405.2-R3. From the July - October period it was confirmed that there were no RSPO certified CPO sales and only RSPO certified PK sales.</p>
Assessment Conclusion:	<p>Based on the corrective action above, these NC can be closed.</p> <p>The effective implementation will be verifying during onsite audit.</p> <p>During the onsite audit, auditor team has verified the record of transaction has been registered/reported in RSPO IT Platform. Based on that fact, this noncompliance satisfactorily closed.</p>

Non-conformity			
NCR Ref #	1937028-202007-M3	Clause & Category (Critical (Major) / Minor)	Critical (Major)
Date Issued	23 July 2020	Due Date	22 October 2020
Closed (Yes / No)	Yes	Date of nonconformity Closure	17 October 2020
Statement of Nonconformity:	The certificate holder (PT Inti Indosawit Subur - Buatan II POM and supply bases) cannot show the specific company procedures and policies related to temporary workers/PHL (Perjanjian Kerja Waktu Tertentu/PKWT).		
Requirement Reference:	RSPO INA NI 2020 Indicator 6.6.2 (C) Where temporary or migrant workers are employed, a specific labour policy and procedures are established and implemented		
Objective Evidence:	<p>PT Inti Indosawit Subur – Buatan II Group uses temporary workers as BHL in Simpang Perak Estate and Buatan II Mill operations. Based on employee list period June 2020, there are 411 workers in Simpang Perak Estate and 13 workers in Buatan II Mill.</p> <p>The company has a procedure regarding SOP New Employee Reception No. AA-HR-305.2-R0 dated 1 February 2009, this procedure is a general acceptance of employees (for all employees), but there are no specific procedures and policies regarding BHL or PKWT workers according to the RSPO P&C requirements.</p>		

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Corrections:	<p>PT Inti Indosawit Subur – Buatan I POM and Estate has issued the specific labour policy and procedures for temporary workers (PHL/PKWT); The policy and procedure are issued for each unit as below:</p> <ul style="list-style-type: none"> • Buatan II POM: Memorandum No. 201/MI-MEMO/PBD/08/20, dated 11 August 2020. • Buatan Estate: Memorandum No. 341/ES-KSP/MEMO/08/2020, dated 10 August 2020. • The policy and procedure have been communicated to workers, especially to temporary workers at Buatan I POM on 22 August 2020, while in Buatan Estate socialization conducted on 15 August 2020 to workers of Afdeling I - III, Traksi and adminsitration. The procedure was explaining the detail of mechanism for temporary workers recruitment, promotion of temporary workers to be permanent workers, term and condition and requirement of temporary workers in accordance with National regulation (UU No. 13 tahun 2003).
Root Cause Analysis:	There has been no coordination between the sustainability department and the HR department in adjusting for updates/changes to the implementation of the RSPO INA NI 2020 principles and criteria, including updating procedures for PHL/PKWT.
Corrective Actions:	PT Inti Indosawit Subur - Buatan II POM & Estate will review the policy and procedure including the implementation of procedure periodically in coordination with Human Resources Department. Sustainability team has made the coordination with HR department and Estate/Mill department to keep updated the policy and procedure according to relevant regulation.
Assessment Conclusion:	<p>Based on the corrective action above, these NC can be closed.</p> <p>The effective implementation will be verifying during onsite audit.</p> <p>During the onsite audit, auditor team has shown the specific company procedures and policies related to temporary workers/PHL (Perjanjian Kerja Waktu Tertentu/PKWT). Based on that fact, this noncompliance satisfactorily closed.</p>

Non-conformity			
NCR Ref #	1937028-202007-M4	Clause & Category (Critical (Major) / Minor)	Critical (Major)
Date Issued	23 July 2020	Due Date	22 October 2020
Closed (Yes / No)	Yes	Date of nonconformity Closure	17 October 2020
Statement of Nonconformity:	Buatan II POM has monitored the emission and pollutants from estate and mill operation using PalmGHG Version 4. However, it was found that information used for GHG calculation in Buatan II POM using PalmGHG Version 4, was not accurate – compared against the estate and mill operational database.		
Requirement Reference:	RSPO INA NI 2020 Indicator 7.10.1		

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	<p>(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>
Objective Evidence:	<p>Audit team was found that the calculation for Buatan II POM, using PalmGHG Version 4 was not accurate – compared against the estate and mill operational database.</p> <p>Example of database seen:</p> <ul style="list-style-type: none"> • From PalmGHG version 4 => the figure for FFB supplied from Buatan Estate & Simpang Perak Estate were stated 51,913 tons – whereby the planted hectareage of 3,505.67 Ha resulting in yield 14.81 ton FFB/Ha/year. The database (LHP) shown the FFB figure from Buatan Estate and Simpang Perak Estate (supplying to Buatan II POM) were 51,524.17 tons. • The figure for FFB supplied from Buatan II Smallholder stated 125,720 tons. The data provided shown the FFB figure from Buatan II Smallholders (supplying to Buatan II POM) was 121,051.61 tons; <ul style="list-style-type: none"> - The figure for FFB supplied from 3rd party stated 85,097 tons. The data provided shown the FFB figure from 3rd party (supplying to Buatan II POM) was 85,486.47 tons; <p>The organization has submitted the GHG for 2020, however the sources of data input period January to December 2019.</p>
Corrections:	<p>The company has revised the GHG data input by adjusting the actual data reported by Buatan I POM and Estate. GHG Calculation amendment can be demonstrated during audit as per " GHG Assessment Report.</p> <p>Summary Report 2020 PT INti Indosawit Subur - Buatan I POM". Based on verification data of data input GHG compare to actual data reported by Buatan II POM and Supply Bases confirmed that the data input in GHG calculation are met and in line with actual data of Buatan II POM and Supply Bases. Input data verify covering: FFB production (own, group & third party), CPO & PK production, OER, KER, PK Shell production and sales, POME production, EFB production, Fertilizer usage (own & group plantation), Planted area (own and group), Conservation area, Fossil fuel usage, Grid electricity, etc.</p> <p>According to GHG summary report, GHG summary emission are: 0.74 tCO2 e/t CPO and 0.74 tCO2 e/t PK.</p>
Root Cause Analysis:	<p>Lack of coordination between the Mill and Estate units in terms of providing raw data with the Jakarta Office that performs GHG calculations.</p>
Corrective Actions:	<p>The Jakarta Office (JRO) coordinates with Buatan II POM & Estate units in terms of providing raw data for input on GHG calculations. Before calculating, JRO cross-checks and verifies the mill and plantation units documented in the "GHG RSPO Sheet". In this form, it is reconfirmed the suitability of the GHG data input with the actual data from the mill and estate reports. GHG RSPO sheet can be demonstrated during audit verification.</p>
Assessment Conclusion:	<p>Based on the corrective action above, these NC can be closed.</p> <p>The effective implementation will be verifying during onsite audit.</p>

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	During the onsite audit, auditor team has shown the GHG calculation in Buatan II POM using the latest PalmGHG Version (Version 4). It has been tally with the estate and mill operational data. Based on that fact, this noncompliance satisfactorily closed.
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Opportunity for Improvement	
OFI#	Description
OFI 1	<p>OFI Statement: NA</p> <p>Verification / Follow-up actions:</p>

3.3.1 Status of Nonconformities Previously Identified and Observations

Nonconformity			
NCR Ref #	1800365-201906-M1	Clause & Category (Major / Minor)	Major
Date Issued	10 th July 2019	Due Date	9 th October 2019
Closed (Yes / No)	Yes	Date of nonconformity Closure	30 th August 2019
Statement of Nonconformity:	Implementation of Occupational Health & Safety Program and Personal Protective Equipment was not in accordance with risk analysis and applicable procedures.		
Requirement Reference:	Records of Occupational Health and Safety (OHS) program (see 4.8) and Personal Protective Equipment (PPE) training in accordance with the result of hazard identification and risk analysis shall be available to all workers.		
Objective Evidence:	<p>Based on field observation, auditor found that:</p> <ol style="list-style-type: none"> 1. Worker hanging on vessel truck and without using PPE at Afdeling 5 Buatan Estate/Simpang Perak Estate while vehicle is moving. 2 (two) 2. FFB loader not using PPE during working at Afdeling 4 Buatan Estate/Simpang Perak Estate. 3. In Plot No. 3451 Farmer Group 152 (KUD Mitra Usaha), one person conduct pesticide spraying individually and without using PPE properly. This is not comply with applicable procedure (SOP Group Certification - SK SOP PT. IIS-Kebun Plasma Buatan No.033/DOK/SOP/PT.IIS-ICS KLB/2017, dated 2 Jan 2017. 		
Corrections:	<ol style="list-style-type: none"> 1. PT IIS Buatan II POM has taken action by issued the warning letter to the worker who violate the OSH regulation. Warning letter No. 002/ST/KSP/07/2019 dated 16 July 2019 on behalf TCH and warning letter No. 001/ST/KSP/07/2019 dated 16 July 2019. In the warning letter valid for six month and if there is a violation regarding OSH regulation the diciplinary sanction can be escalated. 2. Company also has socialized and refresh the OSH regulation to all workers particularly for FFB loader on 19 July 2019. 3. Management Plasma Buatan II has issued the warning letter No. 126/KUD-MU/VII/2019 dated 13 July 2019 on behalf TH, Kavling 3451 KT 152. The smallholder member also has made the statement letter for recognizing and willing to comply the regulation and Group Certification procedure. Socialization 		

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	and awareness regarding the procedure has been conducted on 10 July 2019. The awareness training regarding pesticide use and OSH regulation regarding the PPE usage has been informed to smallholder member on 25 July 2019 to KUD Mitra Usaha, KUD Bina Mulia and KUD Tani Rukun, evidence of awareness can be demonstrated.
Root Cause Analysis:	<ol style="list-style-type: none"> 1. Lack of discipline to wear the appropriate PPE as per OSH regulation/company procedure and lack of monitoring from the field supervisor. 2. Smallholder member were not aware regarding SOP Group Certification - SK SOP PT. IIS-Kebun Plasma Buatan No.033/DOK/SOP/PT.IIS-ICS KLB/2017, dated 2 Jan 2017.
Corrective Actions:	Regular monitoring and inspection for OHS implementation at Plasma Buatan II Regular awareness and socialization related to OHS implementation for employee at estate and plasma Buatan.
Assessment Conclusion:	Audit team has reviewed and accepted the evidence of corrective action prepared by PT Inti Indosawit Subur – Buatan II POM. Audit team concluded that the correction, corrective action and objective evidences are sufficient and accepted. This Major NC is closed on 30 th August 2019.

Nonconformity			
NCR Ref #	1800365-201906-M2	Clause & Category (Major / Minor)	Major
Date Issued	10 th July 2019	Due Date	9 th October 2019
Closed (Yes / No)	Yes	Date of nonconformity Closure	30 th August 2019
Statement of Nonconformity:	There are inconsistency between actual condition and census result.		
Requirement Reference:	Monitoring of Integrated Pest Management (IPM) plan implementation shall be available.		
Objective Evidence:	<ol style="list-style-type: none"> 1. During field visit to KT 200, KT 201 and KT 224 of KUD Bina Mulia, there are found nettle caterpillar in field, however based on "Sensus Ulat Pemakan Daun Kelapa Sawit" period June 2019, there are no more attack of nettle caterpillar. 2. During interview to farmer member of KT 200, KT 201 and KT 224 of KUD Bina Mulia, it was informed that there are nettle caterpillar attack since the previous 3 month, however based on "Sensus Ulat Pemakan Daun Kelapa Sawit" of KT 224 period March, April and May 2019 there is no indication of nettle caterpillar attack. 		
Corrections:	Plasma Buatan II POM has taken action by refreshment training regarding procedure of pest and disease control including the procedure of pest and disease control. The refreshment conducted on 10 August 2019. Evidence of training can be demonstrated during audit. Interview with PIC Pest and disease census (Kodim) indicated that he able to demonstrated the knowledge and skill concerning pest and disease census and control. Management plasma also performed the verification of census checklist result period July 2019 to ensure the correct census has been done. Evidence of verification can be demonstrated during audit.		
Root Cause Analysis:	Lack of understanding from PIC of Pest and disease census regarding the best practices of pest and disease census according to SOP.		

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Corrective Actions:	Verify the census checklist result by field assistant to ensure the correct census has been done by PIC.
Assessment Conclusion:	Audit team has reviewed and accepted the evidence of corrective action prepared by PT Inti Indosawit Subur – Buatan II POM. Audit team concluded that the correction, corrective action and objective evidences are sufficient and accepted. This Major NC is closed on 30 th August 2019.

Nonconformity			
NCR Ref #	1800365-201906-M3	Clause & Category (Major / Minor)	Major
Date Issued	10 th July 2019	Due Date	9 th October 2019
Closed (Yes / No)	Yes	Date of nonconformity Closure	30 th August 2019
Statement of Nonconformity:	No evidence that pesticide application performed by trained person and whether safety equipment are utilized or not.		
Requirement Reference:	Evidence of pesticide application by trained person and in accordance with application guidelines in product label and storage guidelines shall be available. Appropriate safety equipment shall be provided and utilized. All precautions attached to the products shall be properly observed, applied, and understood by workers (see Criterion 4.7).		
Objective Evidence:	<ol style="list-style-type: none"> During field observation to farmer plot at KUD Mitra Usaha (SP-10), it was found a person who conducted spraying activity at KT 152 on plot belong to Ngationo. However, based on "Notulen Penyuluhan Pestisida Terbatas dan K3" dated 25 June 2019 there are no evidence that respective person have followed the training. Based on interview with farmer member of KT 224, KUD Bina Mulia, noted that they have conducted fogging to control nettle caterpillar. Management of Plasma Buatan cannot give further information what insecticide used, whether applicator are trained or not and whether safety equipment are utilized or not. Based on SOP Pengendalian Hama dan Penyakit (AA-PLASMA-PP-KS-02) dated 1 September 2011 for Integrated Pest Management, there are no mechanism that pesticide/insecticide application can be done by third party 		
Corrections:	<ol style="list-style-type: none"> Management Plasma Buatan II has issued the warning letter No. 126/KUD-MU/VII/2019 dated 13 July 2019 on behalf TH, Kavling 3451 KT 152. The smallholder member also has made the statement letter for recognizing and willing to comply the regulation and Group Certification procedure. Socialization and awareness regarding the procedure has been conducted on 10 July 2019. The awareness training regarding pesticide use and OSH regulation regarding the PPE usage has been informed to smallholder member on 25 July 2019 to KUD Mitra Usaha, KUD Bina Mulia and KUD Tani Rukun, evidence of awareness can be demonstrated. Plasma management Buatan II has issued the letter to all KUD & KT regarding "Pengendalian UPDKS" sample seen Letter No. 395/ES-KLB/EXT/08/2019 dated 1 August 2019 to KUD Bina Mulia. The letter stated that third party can be involved in pest control with the requirement: <ul style="list-style-type: none"> Third party provide the fogger, mist blower, swing fog and etc Third party provide the material of insecticide and active ingredients lamdasihalotrin Workers provision assign by related authority (UPTD/Dinas Perkebunan). 		

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	<ul style="list-style-type: none"> Socialization regarding pest control and disease has been performed on 16 August 2019. KUD has to coordinate with Plasma management if they want to involving the third party for pest control.
Root Cause Analysis:	<ol style="list-style-type: none"> Training regarding pesticide use and OSH deliver gradually to the smallholder member, several smallholder member has not follow the training and has scheduled. There is no coordination between KUD and Plasma management regarding the fogging at KUD Bina Mulia to control the nettle caterpillar. Based on SOP Pengendalian Hama dan Penyakit (AA-PLASMA-PP-KS-02), pest control is done by internal company/Plasma Buatan and not involving external third party.
Corrective Actions:	Made the regular training program for smallholder member and kept the training record. Regular monitoring pest and disease and review the result of monitoring by Plasma management to ensure the pest and disease control are in place appropriately.
Assessment Conclusion:	Audit team has reviewed and accepted the evidence of corrective action prepared by PT Inti Indosawit Subur – Buatan II POM. Audit team concluded that the correction, corrective action and objective evidences are sufficient and accepted. This Major NC is closed on 30 th August 2019.

Nonconformity			
NCR Ref #	1800365-201906-M4	Clause & Category (Major / Minor)	Major
Date Issued	10 th July 2019	Due Date	9 th October 2019
Closed (Yes / No)	Yes	Date of nonconformity Closure	30 th August 2019
Statement of Nonconformity:	PT. Inti Indosawit Subur - Buatan II POM cannot demonstrate there is control over outsourced transporter.		
Requirement Reference:	Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following: <ol style="list-style-type: none"> 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. The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. 		
Objective Evidence:	PT. Inti Indosawit Subur - Buatan II POM cannot demonstrate there is control upon outsourcing transporter: <ol style="list-style-type: none"> PT. Inti Indosawit Subur cannot demonstrate 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. PT Inti Indosawit Subur cannot demonstrate control system and communicated the outsourced transport contractor. 		
Corrections:	PT IIS Buatan II POM has made the new agreement contract with transporter in:		

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	<ol style="list-style-type: none"> 1. "Perjanjian Pengangkutan Nomor: 05/VIII/JB-IIS/2019 CV Jasa Bersama and PT Inti Indosawit Subur" dated 2 August 2019. 2. "Perjanjian Pengangkutan Nomor: 06/VIII/WMPL-IIS/2019 PT Wijaya Multi Prima Lestari and PT Inti Indosawit Subur" dated 2 August 2019. 3. "Perjanjian Pengangkutan Nomor: 07/VIII/BJB-IIS/2019 PT Buana Jaya Bersama and PT Inti Indosawit Subur" dated 2 August 2019. <p>The contract agreement has covered:</p> <ul style="list-style-type: none"> • Outsourced process with transporter including right and responsibility between two parties, • Transporter is committed to comply with RSPO SCCS standard and following the regulation, • Transporter is willing to be audited by Certification Body as necessary concerning on RSPO SCCS. <p>Agreement contract has been signed by two parties both PT Inti Indosawit Subur – Buatan II POM (on behalf PT Inti Indosawit Subur Group) and transporter. Transporter also has signed the statement letter which declared that they commit to comply to RSPO SCCS requirement during transporting RSPO certified raw material and they allow the certification body and/or RSPO auditor to conduct the audit to they company and operation.</p> <p>PT IIS Buatan II POM has a procedure to control the outsourced transporter through "SOP Traceability AA-MPM-OP-1400.17-R6 dated 1 September 2017" Internal control for CPO and PK delivery by contractor has made as well by:</p> <ul style="list-style-type: none"> • Surat Izin Muat CPO dan Kernel, contain information of Driver name, Identity number, Car/Truck Number, CPO/PK Dispatch time, netto, incoming and outgoing time\ Delivery Order Slip from Transporter, contain information of sales contract number, Truck number, destination, driver name, port destination. • Daftar Periksa Kesiapan Pengiriman CPO/Kernel contain information of Truck number, driver name, date of inspection, item inspection including: driver identity and completeness of vehicle legality, completeness of physical standard of vehicle, number of segel.
Root Cause Analysis:	PT IIS Buatan II POM deemed that "Surat Perintah Kerja (SPK)" for transporter is the contract, however SPK is not covering the agreement between two parties and not signed by transporter and only by PT IIS – Buatan I POM.
Corrective Actions:	Conduct the internal audit regularly and include the transporter/outsourced process in the internal audit checklist.
Assessment Conclusion:	Audit team has reviewed and accepted the evidence of corrective action prepared by PT Inti Indosawit Subur – Buatan II POM. Audit team concluded that the correction, corrective action and objective evidences are sufficient and accepted. This Major NC is closed on 30 th August 2019.

Nonconformity			
NCR Ref #	1800365-201906-N1	Clause & Category (Major / Minor)	Minor
Date Issued	10 th July 2019	Due Date	9 th October 2019

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Closed (Yes / No)	Yes	Date of nonconformity Closure	23 July 2020
Statement of Nonconformity:	There was lack of evidence that the organization has shown the efforts to ensure the change of information has been understanding by affected parties, e.g: Regarding changes of name of Buatan II Estate into Kebun Simpang Perak (KSP)c		
Requirement Reference:	The company shall have a list of stakeholders, records of communications, including confirmation of receipt and that efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders.		
Objective Evidence:	<ol style="list-style-type: none"> 1. Based on interview with Penghulu Kampung Simpang Desa Perak and representative of KUD sample, there was founded that company has changes of Buatan II Estate into Kebun Simpang Perak (KSP), however were not informed transparently to related party or stakeholder surround the plantations. 2. PT Inti Indosawit Subur – Buatan II POM has issued Kartu Timbang TBS no. PBDA119107234 dated 3 July 2019 from Buatan II Estate Afdeling 2 and has been changing into Kebun Simpang Perak-2 		
Corrections:	Re socialization the information of changing the estate name of Buatan II Estate into Simpang Perak Estate.		
Root Cause Analysis:	Buatan dua has made the socialization on this matter however not cover all the stakeholder		
Corrective Actions:	Conduct regular socialization and stakeholder meeting to discuss the social issue and public information.		
Assessment Conclusion:	<p>Provision of information related to the change of name from Buatan II Estate to Simpang Perak Estate was carried out by the Public Relations, Site Manager and Field Assistance, based on Internal Memorandum No. 015/EST-BUATAN/Memo/09/2019, dated 1 September 2019, concerning Appointment of PIC on the Socialization of Buatan Estate Expansion to Stakeholders Buatan Group using the method of direct communication to stakeholders.</p> <p>The company has performed socialization to all stakeholder related to the changes of Buatan II Estate to Simpang Perak Estate, i.e:</p> <ol style="list-style-type: none"> 1. On 2 September 2019, socialization to government agencies by Site Manager and Public Relations. 2. On September 24, 2019, socialization to local community stakeholders (i.e: Delik village, Lalang Kabung Village) by Public Relations. 3. December 3, 2019, socialization to operational contractors by the Field Assistant, Assistant Head and Public Relations 4. On January 6, 2020, socialization to local communities around the plantation by field assistance. 5. Evidence of Socialization and appointment letter as Internal Memorandum attached. <p>Based on that fact, this nonconformity has been closed.</p>		

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Opportunity for Improvements	
OFI #	Description
OFI 1	<p>Principle 4 Use of appropriate best practices by growers and millers - Indicator 4.6.4</p> <p>Although the use of paraquat is decrease from 2016 (2,211 L), use of paraquat was increase in 2017 to 2018, the use in 2017 is 1,914 L whilst the use in 2018 is 1,983 L.</p> <p>Verification onsite: 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>

Positive Findings	
PF #	Description
PF 1	

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
Previous Assessment (ASA-1.4)				
1800365-201906-M1	Critical	4.7.3	10 July 2019	Closed on 30 August 2019
1800365-201906-M2	Critical	4.5.1	10 July 2019	Closed on 30 August 2019
1800365-201906-M3	Critical	4.6.5	10 July 2019	Closed on 30 August 2019
1800365-201906-M4	Critical	5.5.2	10 July 2019	Closed on 30 August 2019
1800365-201906-N1	Minor	6.2.3	10 July 2019	Closed on 23 July 2020
Recertification Assessment (Remote Audit)				
1937028-202007-M1	Critical	3.8.6	23 July 2020	17 October 2020
1937028-202007-M2	Critical	3.8.16	23 July 2020	17 October 2020
1937028-202007-M3	Critical	6.6.2	23 July 2020	17 October 2020
1937028-202007-M4	Critical	7.10.1	23 July 2020	17 October 2020
Recertification Assessment (Onsite Audit)				
2032041-202103-N1	Minor	6.2.7	5 March 2021	Open
2032041-202103-N2	Minor	7.3.2	5 March 2021	Open

3.4 Stakeholders and previous land owner / user consultation

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

Meetings were conducted with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each

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meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and later was verified with the management team. Any comment which is not complying to the RSPO P&C requirements have been incorporated as an assessment finding.

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

Stakeholders contacted		
Type of Stakeholder (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	Stakeholder name / organization	Means of communication (e.g. face to face interview, email, phone interview, comment from public notice)
Gender Committee:	Ibu Yusniarty (Chief of Gender Committee in Scheme Smallholder PT IIS - Buatan Group)	Face to face
Workers of PT Inti Indosawit Subur – Buatan II POM and Supply Bases	Workers during field visit	Face to face
Government Departments	<ul style="list-style-type: none"> ▪ Environmental Office of Pelalawan Regency: ▪ Department of Plantation in Pelalawan Regency: ▪ Department of Manpower of Pelalawan Regency: 	Phone interview
Penghulu/Head Village	Bukit Agung Village	Phone interview
Union Labour –PUK SPSI	<ul style="list-style-type: none"> • Chief of labour union • Secretary of labour union 	Phone interview
NGO	LPA - Lembaga Perlindungan Anak Kab. Pelalawan	Phone interview

Stakeholders comment	
1.	<p>Feedbacks:</p> <p>Dinas Perkebunan Kabupaten Pelalawan – Plantation Agency Pelalawan Regency</p> <ul style="list-style-type: none"> - PT Inti Indosawit Subur – Buatan I POM has obtained HGU and in line with spatial planning for Pelalawan Regency, as cultivation/plantation area. - Company has reported the plantation operation activities on regular basis to “Dinas Kehutanan dan Perkebunan Kabupaten Pelalawan Semester I 2017”. - There was issue related to request from community for company to release cemetery land and request for company to release land for marketplace development. - The company has obtained Plantation Business Permit (IUP) - There is no report related to land claim and land dispute occurred and submit by community or other

	<p>company.</p> <ul style="list-style-type: none"> - FFB price established based on market price, and company was not bound to FFB price regulated by “Keputusan Penyusunan Harga TBS Propinsi Riau”. Based on report, PT Inti Indosawit Subur – Buatan I POM has price structure better than other companies. - If the plasma replanting program has been agreed by all parties, it should be immediately submitted to the Pelalawan District Plantation Office. <p>Management Responses: Company acknowledge the comment from Plantation Agency. Related to the Replanting Scheme smallholder Buatan II Program: On February 16, 2020, request for information from KUD Kebun Sawit Harapan letter No. 60/KUD-KSH/II/2020, regarding the replanting socialization and has been responded to on February 16, 2020, which will be carried out on February 20, 2020.</p> <p>Audit Team Findings: Audit team will continue to monitor PT Inti Indosawit Subur – Buatan I POM related to Plantation management and monitoring performance.</p>
<p>2.</p>	<p>Feedbacks: Environmental office of Pelalawan Regency - Dinas Lingkungan Hidup Kabupaten Pelalawan</p> <ul style="list-style-type: none"> ▪ Company has revised the AMDAL document. ▪ Company has an environmental document related to development of biogas plant and kernel crushing plant. ▪ Replanting activity has been covered in environmental management and monitoring plan. ▪ Company has consistently reporting the environmental management: Laporan RKL-RPL, Laporan Pengelolaan Limbah B3, Laporan Pemanfaatan Limbah Cair. ▪ PT Inti Indosawit Subur – Buatan I & II POM has performed environmental management in good manner. ▪ Hazardous waste/LB3 monitoring report on Shelter Temporary (TPS) Hazardous waste/LB3 has been done. ▪ Company has managed the hazardous waste, obtained permit for temporary storage – in accordance with relevant regulation. ▪ There was no report from stakeholder on environmental pollution caused by plantation operation of palm oil mill operation. ▪ There is a request from the community of Pangkalan Kerinci City for the procurement of public cemeteries by taking the HGU area of PT IIS covering area 4 Ha. <p>Management Responses:</p> <ul style="list-style-type: none"> ▪ For the positive things that have been done will be maintained and improved towards a better by management companies. ▪ In the face of replanting activities, of course there are many social issues arising from environmental impacts. In this case, the company has conducted a social impact aspect (SIA) assessment which subsequently made a social impact management plan. Plans for management and monitoring of social impacts to avoid or reduce negative impacts and promote positive ones presented in “<i>Rencana Kelola Dampak Sosial dan Rencana Pemantauan Dampak Sosial</i>”. ▪ Related to requests for Public Cemeteries (TPU:Tempat Pemakaman Umum) by the people of Pangkalan Kerinci City: On February 9, 2021, an audience was held in the Auditorium Room, 3rd Floor of the Pelalawan Regent's Office, Pangkalan Kerinci.

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	<p>The hearing was attended by the Regional Secretary of Pelalawan: Bpk. Tengku Mukhlis, Deputy Chairperson of Commission I of the Pelalawan Regency DPRD: Bpk. H Abdullah, the Head of the Pelalawan BPN office: Bpk. Ruslan Indra, the Riau Regional Public Relations Manager for Asian Agri Group: Bpk. Ahmad Taufik SH and dozens of representatives of the LPM and RT Forums, RW and Pangkalan Kerinci District.</p> <p>On that occasion, PT Inti Indosawit Subur (PT IIS), represented by Bpk. Taufik as Public Relations state that PT IIS had approved the assistance of 3 hectares of TPU land to the community.</p> <p>The management of PT. IIS is seeking 4 options for the land to be given, including Desa Makmur, which is located on the west Kerinci road. From 4 location points which will be realized and 2 locations have been negotiated by the team and 2 more locations will be met directly with the owner for negotiations.</p>
	<p>Audit Team Findings:</p> <p>Audit team has verify the record of follow up action by company related to a request from the community of Pangkalan Kerinci City for the procurement of public cemeteries by taking the HGU area of PT IIS covering area 4 Ha. Management of PT IIS has well respond to follow up the local community request, currently the management of PT. IIS is seeking 4 options for the land to be given, including Desa Makmur, which is located on the west Kerinci road. From 4 location points which will be realized and 2 locations have been negotiated by the team and 2 more locations will be met directly with the owner for negotiations. Audit team will continue to monitor PT Inti Indosawit Subur – Buatan II POM related to Environmental management and monitoring performance.</p>
<p>3.</p>	<p>Feedbacks:</p> <p>Department of Manpower of Pelalawan Regency:</p> <ul style="list-style-type: none"> ▪ Generally, PT Inti Indosawit – Buatan II POM has built good communication with Manpower and Transmigration Office – Pelalawan Regency. ▪ PT Inti Indosawit Subur – Buatan II POM has complied well with legislation related to employment, i.e; <ul style="list-style-type: none"> - Company has provided all normative rights for employee, such as salary as lined out in minimum wage for province level, leave entitlement, employees registered with social insurance for worker (BPJS), benefit for religious festival, provision of facilities (housing, electricity, clean water, medical clinic, school/school bus, worship house, personal protective equipment, working tools, etc.). - There was no report/complaint logged in related to discriminative action by company. There was no report/complaint logged in related to the use of child worker/under age worker. - Company has submitted health and safety performance report regularly to the manpower agency. - Complaint received from worker union related to medical service provided by “BPJS Kesehatan”, in particular medical treatment service from hospital/clinic where no cooperation with BPJS. - There is no industrial relationship dispute occurred from the last year. - No identified issues related to the use of child labor, violence and forced labor. - Company has prepared infrastructure and facility for worker’s welfare such as: housing, clean water, electricity, medical facility, education, etc. - There are employees who are identified use of drugs/Narcotic in PT Inti Indosawit Subur – Buatan II POM. <p>Suggestions:</p>

- 1) In relation to the daily worker (PHL), so that the appointment program can be made as a permanent worker if it meets the requirements.
- 2) PKB is still made by HO Medan, can be considered to make Derivative PKB

Management Responses:

- 1) Based on the employees master for the period December 2020, PT IIS still has temporary workers (Daily: PHL and PKWT) who do the main work, namely:

- Simpang Perak Estate:

Based on employee's master of Simpang Perak Estate period December 2020 verification obtained information as follows:

- Harvester from period 2010-2015: 12 harvesters
- Harvester from period 2016-2019: 57 harvesters
- Addition/recruits of harvester in 2020: 23 harvesters

So, total of harvester with the status of daily /temporary works as much as: 92 harvesters

- There was only one Promotion of PHL (Daily workers) to SKU (permanent workers) in 2021 on behalf of harvester Radot Butar Butar (refer to memorandum No. 004/HR-RO2/MEMO/SK/01/2021 dated 30 January 2021).

- Buatan 2 POM:

There is a record of mill operator as per December 2020:

- Worker from period 2011-2015: 6 workers
- Worker from period 2016-2020: 6 workers

So, the total of employees in processing with status of daily /temporary worker in Buatan 2 POM as much as 12 workers.

- Buatan I Estate:

Based on the employee master for the period December 2020, PT IIS – Buatan I Estate still have temporary workers (Daily: PHL) who do cores jobs, namely:

Harvester	: 16 workers
FFB Loader	: 4 workers

Total : 20 workers

In the 2020 period, 14 harvesting workers were appointed from daily workers (PHL) to permanent workers (SKU), based on the Memorandum from Regional Head Plantation II No. 280/HR-RO2/MEMO/SK/09/2020 dated 08 September 2020, for example:

- Memorandum No. 280/HR-RO2/MEMO/SK/09/2020 dated 08 September 2020 for the promotion of an employee named David M M.R. Cianipar (harvester) at Buatan I Estate is valid from October 1, 2020.
- Memorandum No. 096-099/HR-RO2/MEMO/SK/04/2020 dated 27 April 2020 for the promotion of harvesting workers named: Murzal, Edi Sudrajad, Sugiarto and Joko Prayogi at Buatan I Estate starting from May 1, 2020.

- 2) Company has already programmed an annually employee promotion on 2019 until 2021, that is: "Program 3 Years of Buatan II POM to Appointment of PHL employees to SKU
- 3) Worker Agreement (PKB) between company and labour union is referred in working regulation, Worker Agreement was registered by "Dirjen Pembinaan Hubungan Industrial dan Jaminan Sosial Tenaga Kerja"

PKB is for period of 2018 – 2020 and has done registered by Dirjen PHI/JSK the Ministry of Employment on 4 July 2018. Based on document review, it was noted that the term and condition, such as: working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons

	<p>for dismissal, period of notice are covered in PKB and contracts which have been signed by labour union.</p> <p>Making Working Agreement - PKB which is a derivative of PKB from HO Medan and agreement with PUK SPSI Medan still needs to be communicated and socialized related to the formation of a derivative PKB.</p> <p>Audit Team Findings:</p> <p>The company has taken action in accordance with well-established procedures and persuasive approach, so there is no turmoil/issue.</p> <p>With respect to wages, the use of PPE and SIO, the company has implemented in accordance with relevant law and regulations.</p> <p>Regarding the formation of PKB derived from PUK SPSI, the auditor team will carry out verification at the next audit visit.</p>
<p>4.</p>	<p>Feedbacks:</p> <p>NGO; Child Protection Institution LPA - Lembaga Perlindungan Anak Kab. Pelalawan</p> <ul style="list-style-type: none"> ▪ There are at least two reasons why child labor is still prevalent in oil palm plantations <ol style="list-style-type: none"> 1) First, poverty in rural areas is the reason parents make their children work on oil palm plantations. 2) The practice of child labor in oil palm plantations is, in essence, triggered by low wages for adult laborers and the obligation to achieve work targets and earn additional money. ▪ With this obligation, these adult workers (parents) finally allow their children to work because they are lulled into the way of life that is regulated by the capitalist. ▪ Their hope of entering the palm oil industry is to get economic benefits, improve living standards such as nutritional consumption and food quality ▪ Based on field observations and consultations with the gender committee, PT IIS - Made by the Group does not prove that there is a practice of child labor or child employment. <p>The company has a very strict policy on child labor and is always socialized to all workers and stakeholders.</p> <p>Management Responses:</p> <ul style="list-style-type: none"> ▪ For the positive things that have been done will be maintained and improved towards a better by management companies. ▪ PT Inti Indosawit Subur has established Company Policy dated 1 December 2019, which stated there is not allowed all children to work in every activities/processes in company. This policy has been socialization to all worker and contractor on 17-21 February 2020. It stated on Company policy on point 14; "Prohibit children from working in any company activities". ▪ PT IIS – Buatan Group, also put in place a policy related to the prohibition of child labor (under 18 years), on the document of the FFB Supplier Statement and Guarantee in point 12; "Do not employ children (under 18 years) which as prohibited by Law no. 13/2003. ▪ Management has conducted a survey and consultation to 40 female workers with a method of interviewing directly in January 2020 to identify the needs for female workers who have children / infants under 5 years and are still breastfeeding. From the results of the survey and consultation, management issued several policies, including: ▪ The company is very concerned about children (especially those who are still toddlers) by issuing Policy for employees who are breastfeeding, based on the Memorandum from the Farm Manager No. 171/ES-IIS/MEMO/ 01/20 dated January 4, 2020, stated: the company guarantees female employees to breastfeed their children during working hours, by giving time and place to all female employees who have babies to breastfeed their children once for 45 minutes: morning at 10.00-10.45 WIB at the clinic or afdeling office or 11.30 - 12.15 WIB.

	<p>Periodic checkups at the clinic to monitor the health of the baby by providing POSYANDU services once a month at the Central TPA (Child Care Center) including immunization and vitamins.</p> <p>Audit Team Findings: Acknowledge by the auditor as a positive response, and will be monitored at each subsequent audit.</p>
<p>5.</p>	<p>Feedbacks: Head of Bukit Agung Village – Panghulu Desa Bukit Agung:</p> <ul style="list-style-type: none"> ▪ Villagers around ethnically are Batak, Javanese, Sundanese and Banjar. ▪ There was no land conflict between company with surrounding community. ▪ No land conflict was reported since hand-over was done in proper settlement in the beginning. ▪ In general communication and coordination between the village government and the Company has been running well. ▪ The Company always responds to any problems submitted by the village government officials or from the surrounding community, villagers have confirmed that organisation has done some positive CSR activities on their surroundings. Routinely companies provide assistance through CSR programs in the form of borrowing heavy equipment (excavators, graders and compactors), scholarships, assistance to the poor, religious facilities, etc. ▪ Access roads surrounding villages are always maintained by the company. ▪ Enclave owner has proper access to their own farm inside company’s farm without any difficulties. ▪ Employee recruitment from the surrounding villages was not adequate. ▪ No identified issues related to the use of child labor, violence and forced labor ▪ There are no reports from the public regarding the operational activities of companies that violate Human Rights such as the Right to Organize and assemble Conduct worship in accordance with beliefs, as well as other practices of violation of Rights such as the use of mercenaries for the intimidation of workers, the sale of human beings etc. <p>Management Responses:</p> <ul style="list-style-type: none"> ▪ Communication is always well established with the surrounding community, so was no land conflict with surrounding community until conduct this audit. ▪ Routinely companies provide assistance through CSR programs in the form of borrowing heavy equipment (excavators, graders and compactors), scholarships, assistance to the poor, religious facilities, etc. ▪ Improving future CSR programs based on the potential of the village concerned and empowering the community by conducting soft skills training. For example with agricultural and livestock farming programs with at the same time provide direct guidance and direction. ▪ Associated with the establishment of plantations through plasma scheme, which is completed 100% of the plan. <p>Audit Team Findings:</p> <ul style="list-style-type: none"> ▪ It is suggested that PT Inti Indosawit Subur can maintain communication with the community and village apparatus. ▪ CSR programs to be developed in accordance with community empowerment programs and guidance and coaching. ▪ The use of labor to be prioritized to the surrounding community by referring to recruitment procedures.
<p>6.</p>	<p>Feedbacks: Union Labor –PUK SPSI:</p> <ul style="list-style-type: none"> ▪ Company and employee has agreed to establish bipartit organization to resolve issued related to

	<p>industrial relationship; the organization has been registered to “Dinas Tenaga Kerja Kabupaten Pelalawan”. Meeting between company and employee conducted whenever issues occurred and requires discussion.</p> <ul style="list-style-type: none"> ▪ Company has provided health and safety training and provided first aid kit to field supervisor/mandor. ▪ Company has a policy to prohibit the recruitment of employee under 18 years old, including family worker in all operation. ▪ Company does not use migrant worker and prohibit force labour. ▪ Worker salary has followed minimum wage as lined out by Riau Province government for year 2017 ▪ There is a collective working agreement between company and employee. ▪ Company has provided all normative rights for employee, such as salary as lined out in minimum wage for province level, leave entitlement, employees registered with social insurance for worker (BPJS), benefit for religious festival, provision of facilities (housing, electricity, clean water, medical clinic, school/school bus, worship house, personal protective equipment, working tools, etc.). <p>Management Responses: Management will strive to continue and improve the positive practices in implementing company commitment towards health and safety, and upholding the human rights.</p> <p>Audit Team Findings: Acknowledge by the auditor as a positive response, and will be monitored at each subsequent audit. Audit team will continue to monitor PT Inti Indosawit Subur – Buatan II POM related to Plantation management and monitoring performance.</p>
<p>7.</p>	<p>Feedbacks: Gender Committee:</p> <ul style="list-style-type: none"> ▪ Company has implemented the policy related to protection reproductive right; such as not hiring female for work activity with high risk; monthly pregnancy test for sprayer and fertilizer applicator; 6-monthly check up for sprayer and fertilizer applicator. ▪ All female worker in sprayer team and fertilizer team shall join pregnancy test in company clinic, once a month. ▪ There has been no report logged in to committee related to sexual harassment and/or violence. ▪ There is no indication that company practicing sexual harassment, no indication of gender discrimination, no indication of human right violation, and forced labour. ▪ The leader of gender committee has not understood what the work program is and procedure in case of sexual harassment <p>Management Responses Management will strive to continue and improve the positive practices in implementing company commitment towards health and safety, and upholding the human rights. The appointment of the head of the new gender committee was conducted in July 2019, so it is necessary to undertake learning and training and briefing related to the knowledge of gender committees.</p> <p>Audit Team Findings Audit team will continue to monitor PT Inti Indosawit Subur – Buatan II POM related to Plantation management and monitoring performance.</p>

List of land owner / user contacted

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

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

3.5 Impartiality and conflict of interest

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

Formal Signing-off of Assessment Conclusion and Recommendation

The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that Buatan II POM has complied with the Indonesia National Interpretation 2020 of the RSPO P&C 201 and audit criteria identified within the audit report. It is deemed that the management system has achieved its intended outcomes. Therefore, it is recommended that Buatan II POM is remain certified.	
Report prepared by	Acceptance of Assessment Conclusion
Name: Andi Pratama Pasaribu	Name: Putu Grhyate Yonata Aksa
Company Name: On behalf of BSI Services Malaysia Sdn. Bhd.	Company Name: PT. Inti Indosawit Subur – Buatan II
Title: Lead Auditor	Title: Sustainability Manager
Signature: 	Signature: 
Date: 6 May 2021	Date: 6 May 2021

Appendix A: Summary of Findings

Criterion / Indicator	Assessment Findings	Compliance	
<p>Principle 1: Behave ethically and transparently</p>			
<p>Drive ethical business behaviour, build trust and transparency with stakeholders to ensure strong and healthy relationships.</p>			
<p>Criteria 1.1: The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.</p>			
<p>1.1.1</p>	<p>(C) Management documents that are specified in the RSPO P&C are made publicly available.</p>	<p>PT Inti Indosawit Subur – Buatan Group has had list of information and listed in “<i>Daftar Dokumen dan Informasi untuk Diakses Publik PT Inti Indosawit Subur</i>” has established on 15 January 2020, there are 32 type of document of information, including:</p> <ul style="list-style-type: none"> - Land titles/user rights (Izin Lokasi, Izin Prinsip, IPKH, Sertifikat HGU, HGB and IMB) - Occupational health and safety plans (Laporan Pelaksanaan P2K3) - Plans and impact assessments relating to environmental and social impacts (AMDAL, Environmental licensing and Environmental Management Program) - HCV & HCS documentation (Conservation Management Plan, HCV Report, Social Impact Assessment and HCV Identification Report) - Pollution prevention and reduction plans (Environmental Management Program, Hazardous waste Report-Laporan LB3, Land Application Report and also Report of physical and chemical analysis of river water) - Details of complaints and grievances (Procedure of Information handling, Procedure of “keluhan konflik lahan” and records of 	<p>Complied</p>

		<p>and recording of deliberation process and compensation).</p> <ul style="list-style-type: none"> - Negotiation procedures (Recording of deliberation process and compensation) - Continuous improvement plans (Continuous Improvement Program) - Human Rights Policy (including in the Company Policy update on 1 December 2019 and has been dissemination to all operation at workplace on 3-7 February 2020) <p>Its List provides in Bahasa Indonesia and the form can be understand with all stakeholders. The list of information has been dissemination at the time of with the company Policy on 3-7 February 2020 to all operation at workplace.</p> <p>Scheme Smallholder: Plasma Buatan II has a list of documents that can be access by Stakeholder updates as of 15 January 2020. Its List provides in Bahasa Indonesia and the form can be understand with all stakeholders. The list of information has been dissemination at the time of with the company Policy on 3-7 February 2020 to all operation at workplace. There are 32 type of document of information, including:</p> <ul style="list-style-type: none"> - Land titles/user rights (Sertifikat SHM, Akta KUD and IMB) - Occupational health and safety plans (Laporan Pelaksanaan P2K3) - Plans and impact assessments relating to environmental and social impacts (AMDAL, Environmental licensing and Environmental Management Program) 	
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		<ul style="list-style-type: none"> - HCV & HCS documentation (Conservation Management Plan, HCV Report, Social Impact Assessment and HCV Identification Report) - Pollution prevention and reduction plans (Environmental Management Program) - Details of complaints and grievances (Procedure of Information handling, Procedure of “keluhan konflik lahan” and records of and recording of deliberation process and compensation). - Negotiation procedures (Recording of deliberation process and compensation) - Continuous improvement plans (Continuous Improvement Program) - Human Rights Policy (including in the Company Policy update on 1 December 2019 and has been dissemination to all operation at workplace on 3-7 February 2020) 	
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders.	<p>PT Inti Indosawit Subur – Buatan Group has had list of information and listed in “<i>Daftar Dokumen dan Informasi untuk Diakses Publik PT Inti Indosawit Subur - Buatan II</i>” has established on 15 January 2020, there are 32 type of document of information, including:</p> <ol style="list-style-type: none"> 1. Land titles/user rights (Izin Lokasi, Izin Prinsip, IPKH, Sertifikat HGU, HGB and IMB) 2. Occupational health and safety plans (Laporan Pelaksanaan P2K3) 3. Plans and impact assessments relating to environmental and social impacts (AMDAL, Environmental licensing and Environmental Management Program) 	Complied

		<ol style="list-style-type: none"> 4. HCV & HCS documentation (Conservation Management Plan, HCV Report, Social Impact Assessment and HCV Identification Report) 5. Pollution prevention and reduction plans (Environmental Management Program, Hazardous waste Report-Laporan LB3, Land Application Report and also Report of physical and chemical analysis of river water) 6. Details of complaints and grievances (Procedure of Information handling, Procedure of "keluhan konflik lahan" and records of and recording of deliberation process and compensation). 7. Negotiation procedures (Recording of deliberation process and compensation) 8. Continuous improvement plans (Continuous Improvement Program) 9. Human Rights Policy (including in the Company Policy update on 1 December 2019 including the policy on protection of human rights defenders (HRDs)/Whistleblowers and has been dissemination to all operation at workplace on 3-7 February 2020) <p>Its List provides in Bahasa Indonesia and the form can be understand with all stakeholders. The list of information has been dissemination at the time of with the company Policy on 3-7 February 2020 to all operation at workplace.</p> <p>Scheme Smallholder: Plasma Buatan I has a list of documents that can be access by Stakeholder updates as of 15 January 2020. Its List provides in Bahasa Indonesia and the form can be understand with all stakeholders. The list of information has been dissemination at the time of with the company</p>	
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		<p>Policy on 3-7 February 2020 to all operation at workplace. There are 32 type of document of information, including:</p> <ul style="list-style-type: none"> - Land titles/user rights (Sertifikat SHM, Akta KUD and IMB) - Occupational health and safety plans (Laporan Pelaksanaan P2K3) - Plans and impact assessments relating to environmental and social impacts (AMDAL, Environmental licensing and Environmental Management Program) - HCV & HCS documentation (Conservation Management Plan, HCV Report, Social Impact Assessment and HCV Identification Report) - Pollution prevention and reduction plans (Environmental Management Program) - Details of complaints and grievances (Procedure of Information handling, Procedure of "keluhan konflik lahan" and records of and recording of deliberation process and compensation). - Negotiation procedures (Recording of deliberation process and compensation) - Continuous improvement plans (Continuous Improvement Program) - Human Rights Policy (including in the Company Policy update on 1 December 2019 including the policy on protection of human rights defenders (HRDs)/Whistleblowers and has been dissemination to all operation at workplace on 3-7 February 2020) 	
1.1.3	(C) Records of requests for information and responses are maintained.	Requests for information are responded by the department concerned in accordance with their authority. The company has developed a matrix describing the status of each information request and responsible to respond into. The company has appointed personal responsibility in accepting and responding to the request for information from the stakeholders, the personal responsible is the HUMAS (Public Relations).	Complied

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		<p>Appointment based on Transfer Letter No. 226/HRD/AA/TL/XI/2014 dated 7 November 2014 and also organisation raised the Internal Memorandum No. 388/ES-KBN/MEMO/06/2015 dated 1 June 2015 related to Duties and Responsibilities of Buatan Group Public Relations to Mr. Lindu Simatupang (as a Public Relation on PT IIS – Buatan Group).</p> <p>Certification holder has had a procedure of consultation and communication is records on SOP No. AA-GL-5008.1-R1: <i>Penanganan Permintaan Informasi Stakeholder</i>. The consultation and communication procedure was socialized to stakeholder on 5 February 2020 and participated by 15 stakeholders.</p> <p>Records of response of request information documented in the same book, consist of person handle the request, information given and acknowledgement from the person in-charge and signature. Record of incoming communication available in each estate and mill unit.</p> <p>The request for information was recorded on Log Book "Surat Masuk dan Keluar" on period 2019-2020 on Simpang Perak Estate and Buatan II POM, taken example:</p> <ul style="list-style-type: none"> - On January 21, 2020 request from Bappeda Letter No. 050/Bappeda-V/ 2020/47, Regarding Request for CSR Implementation Report and has been responded to by Public Relations on January 21, 2020. - On February 10, 2020, request for information from the Head of Pangkalan Kerinci Sub-District letter no. 800/um/2020/40, regarding the invitation for the 2020 population census coordination meeting and was responded to on 10 February 2020. 	
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		<ul style="list-style-type: none"> - On March 3, 2020, request for information from the Majelis Ta'lim Al Mukhlisin letter No. 002/MT/III/2020 regarding Bus borrowing, has been responded on March 3, 2020 by the Plantation Manager. <p>Smallholder Scheme</p> <p>Request Information and response from Stakeholder is documented into a log book "Kebun Plasma Buatan", up to May 2020, there was 8 information requests in Plasma/smallholder Division, mostly request EFB for fertilizer in scheme smallholder area. Based on procedure stated that responds for information request within 14 days.</p> <p>Scheme smallholder Buatan II, taken sample:</p> <ul style="list-style-type: none"> - On 7 May 2019, request for information from KUD Bhirawa Bhakti letter no. 110/KUD-BB/V/2019, regarding Changes in schedule and transport of TBS Plasma, has been responded to on May 7, 2019. - On February 16, 2020, request for information from KUD Kebun Sawit Harapan letter No. 60/KUD-KSH/II/2020, regarding the replanting socialization and has been responded to on February 16, 2020, which will be carried out on February 20, 2020. - April 1, 2020, request information from KUD Buatan Jaya letter no. 174/ KUD-BJ/IV/2020, regarding the addition of TBS Plasma SP-X transportation. Responded April 1, 2020. 	
1.1.4	<p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official.</p>	<p>Certification holder has had a procedure of consultation and communication is records on SOP No. AA-GL-5008.1-R1: <i>Penanganan Permintaan Informasi Stakeholder</i>. The consultation and</p>	Complied

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		<p>communication procedure was socialized to stakeholder on 5 February 2020 and participated by 15 stakeholders.</p> <p>The company has appointed personal responsibility in accepting and responding to the request for information from the stakeholders, the personal responsible is the HUMAS (Public Relations). Appointment based on Transfer Letter No. 226/HRD/AA/TL/XI/2014 dated 7 November 2014 and also organisasion raised the Internal Memorandum No. 388/ES-KBN/MEMO/06/2015 dated 1 June 2015 related to Duties and Responsibilities of Buatan Group Public Relations to Mr. Lindu Simatupang (as a Public Relation on PT IIS – Buatan Group). y 2020 was attended by 9 participants as well.</p> <p>The Internal Memoradum is also explained about the duties and responsibilities of public relations, including: Records of response of request information documented in the same book, consist of person handle the request, information given and acknowledgement from the person in-charge and signature. Record of incoming communication available in each estate and mill unit. Mr. Lindu, as a public relations officer, has socialized the procedure to interested parties on 24 September 2019 which was attended by 12 participants and dated 16 July 2020.</p>	
1.1.5	An up-to-date list of contacts and detailed stakeholder information is available along with designated representatives.	<p>PT IIS - Buatan Group Stakeholder has maintained list of stakeholder update on May 2020. The List of stakeholders consists of several types of stakeholders based on regional levels: village, provincial and national districts (34 stakeholders), including NGO, for example: WWF, Scale Up and LCKI (Lembaga Cegah Kejahatan Indonesia).</p> <p>The list of stakeholders presented in detail about the address, name of person and phone number and also position and title, the list is including</p>	Complied

		<p>of regent of Pelalawan, Environment Agency, Social Office & Workers of Pelalawan Regency, Camat Kerinci Kanan, Head of Village Mekar Jaya and Head of Village Makmur etc.</p>	
<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>The company has had a corporate policy set on 1 December 2019 in Medan which has been ratified by the Managing Director (Kevin Tio). The company's policy confirms the code of Conduct behaviour in business at point 2); Policy on the conduct of fair and ethical business on all transactions and business operating, including the prohibition of all forms of corruption, bribery and fraud in the use of funds and resources.</p> <p>In the employee selection process, the company has sets policies related the conduct of business ethics in the daily worker agreement (<i>Perjanjian Kerja Harian Lepas</i>), which is stated in the appendix to corporate policies and behaviors that must be complied with. PKB is a joint working agreement for permanent workers, also confirmed about the conduct of business ethics in article 16 related of the behaviour of the ethical business in the company.</p> <p>The company's policy is also published to use posters at any strategic places in the plantations (Simpang Perak Estate and Mill). Corporate policy has been socialized/dissemination to all levels of PT IIS – Buatan Grup on 3- 7 February 2020 (list of participants can be shown) and on stakeholders (including local contractors) on 23-43 January 2020 which was attended by 25 stakeholders.</p>	<p>Complied</p>

		<p>A Policy for ethical conduct is including on Company policy has been socialized/delivered to all levels of PT IIS – Buatan Group employees on 21-22 January 2020 (list of participants can be shown) and on stakeholders (including local contractors) on 23-43 January 2020 which was attended by 25 stakeholders.</p>	
1.2.2	<p>A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.</p>	<p>The certificate holder of PT IIS – Buatan Group already has a system or mechanism to monitor the implementation of company policies including the company code of ethics. GM and Public Relations provide responses to an information/case based on the AA GL-5008.1 R1 Procedure, which for the next mechanism is based on the Settlement Procedure with the local community (Procedure No. AA-GL-5009.R1 regarding settlement with the local community, this mechanism also explain related to the reporter's guarantee and disclosure of cases or information.</p> <p>In every transaction resulting from the work that has been completed, Buatan II Group has a mechanism to monitor business ethics policies, for example: in each work completion, a "<i>Berita Acara Penyelesaian Pekerjaari</i>" which has been verified by the Field Assistant and known by the Estate Manager must be made both inti and plasma plantations (smallholders).</p> <p>PT IIS - Buatan II Group also conducted an internal audit to ensure that the company's policies were implemented properly, the last internal audit was carried out on October 28 - 31 2019.</p>	Complied

<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 to relevant regulations.	<p>PT Inti Indosawit Subur – Buatan II POM has demonstrated the evidence of compliance with relevant legal requirement as in “Evaluasi Kepatuhan Hukum PT Inti Indosawit Subur – Buatan unit Pabrik dan Kebun”. All legal requirements comply with the regulations and laws, including those related to land status, occupational health and safety, environmental, labour, agricultural practice, and mill operation, such as:</p> <ol style="list-style-type: none"> 1. Ijin Prinsip (Principle permit) No.KB.320/859/Mentan/XI/1983 dated 7th November 1983 from Agriculture minister (65,000 Ha). 2. Ijin lokasi (Location Permit) No.KPTS.57/II/1987, dated 4th February 1987 for 32,000 Ha. 3. Ijin Pelepasan kawasan from Forestry Ministry (Release forest permit) No.664/Kpts-II/89, dated 31st October 1989. 4. Ijin pembukaan lahan (land clearing permit) No.1536/II/KW-6/1988, dated 2nd November 1988 from Forestry Ministry Region Riau Province. 5. Surat Keterangan Pendaftaran Tanah (Land register) from land authority of Pelalawan District No.15/SKPT/X/2004, dated 30th September 2004. 6. Surat Pendaftaran Usaha perkebunan (SPUP) from Forestry and Plantation Ministry, No.185/Mentanhut/VII/2000, dated 3rd November 2000. 7. SK. HGU (Land Title), approved by “Menteri Negara Agraria/Kepala BPN No.10/HGU/1993, dated 13th May 1993 tentang Pemberian HGU atas nama PT. Inti Indosawit Subur, atas tanah di Kabupaten Kampar seluas 5,781.47 Ha”. 8. HGU (Land titles) No.01, 1993, dated June 19th, 1993. for Buatan Estate (5,781 Ha); 9. Renewal land title No.145/HGU/BPN/2004, dated November 3rd, 2004. Expired until 2058 from Head of BPN (5,781 Ha); 10. IMB (Building licenses), there were 6 permits, such as; No.106/2009, 71/2009, 09/2009, 11/1992, 56/2009, 117/1997. 11. IMB for Buatan II Mill was issued by Dinas Pekerjaan Umum 	Complied
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		<p>Pelalawan Regency on 16 January 1997 no. 117/IMB/PU.CK/I/1997.</p> <ol style="list-style-type: none"> 12. AMDAL (Environmental and Social impact assessment), SEIA No.013/ANDAL/BA/V/95, dated 3rd May 1995, by Agriculture of Ministry. 13. Revised AMDAL (Dokumen Pengelolaan dan Pemantauan lingkungan) approved by Governor of Riau No.KPTS 975/X/2009, dated 28th October 2009. 14. Surface water usage permit from Dinas Pertambangan dan Energi, Kabupaten Pelalawan No.14/KPTS/M/2018, dated 5 January 2018 (valid until 4 January 2023). 15. Liquid waste utilization permit (Land Application) issued by Dinal Lingkungan Hidup Pelalawan Regency on 10 September 2014 no. KPTS.660/BLH/781/2014 valid until 9 October 2019. 16. Machinery permit in Mill is available. <ul style="list-style-type: none"> Mill machineries permit: <ul style="list-style-type: none"> ▪ Permit for Sterilizer reference number: #027-029/BU/PL/2005, issued on 27th June 2005 for capacity 3.25 kg/cm²; Sterilizer 4, no. 03/B.0302, issued on 18 June 2005 has been inspected by official inspector (PT Jesindo Mandiri) and approved by labor agency of Riau Province on 22 April 2019. ▪ Tera measurement for weighbridge 1 and 2 issued by Badan Metrologi Pelalawan Regency ref no. 510.3/UPTMET/SKHP/2018/104 and no. 510.3/UPTMET/SKHP/2018 /105 dated 15 October 2018 and will be tera on 14 October 2019. ▪ Permit for Back Pressure Vessel reference number: 56/BU/PK/VII/2018 issued on 25th July 2018 for capacity 3.5 kg/cm², will be inspections on 24 July 2020. ▪ Permit for Boiler reference number: 008/KU/PLLWN/2003 issued on 25th June 2005 for capacity 24 kg/cm²; reference number: 036/KU/PLLWN/2003 issued on 25th June 2005 for capacity 24 kg/cm²; reference number: 560/KU/PL/2015/002 	
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		<p>issued on 7 July 2005 for capacity 24 kg/cm2 and will be inspection on 9 June 2020.</p> <ul style="list-style-type: none"> ▪ Permit for Diesel engine (Genset), reference number: 064/M-MD/PLLWN/2003 and 084/M-MD/PLLWN/2003 issued on 27 June 2005 for capacity 420 horsepower each and will be inspection on 30 October 2019. ▪ Permit for Compressor, reference number: 012/BT/PLLWN/2003 issued on 25 June 2005 and will be inspection on 30 October 2019. ▪ Permit for Turbine, reference number: 085/M-MD/PLL/2005 issued on 27 June 2005 for capacity 1.200 KW; and will be inspection on 30 October 2019. <p>Scheme Smallholder:</p> <p>Group manager and ICS conducted the evaluation of laws and regulation compliance each year. Latest updated was on 1st January 2017. During audit, Group manager can demonstrate the document of "Evaluasi Kepatuhan Hukum Kebun Plasma Buatan Tahun 2017" which contain the list/'legal register' of all applicable laws and regulations; consist of: list of regulation, requirement, evaluation record, compliance status, type of document, no. document, validity, source of document, remark.</p> <p>Some example showing compliance to relevant regulation of land tittle, cooperative legal as follows:</p> <p>Smallholder</p> <p>During this audit, sample taken are from KUD Mulus Rahayu, Bhirawa Bhakti, Buatan Jaya and Kebun Sawit Harapan. From random smallholder sampling obtained information that all KUD's member has had personal land title certificate, plantation permit and environmental permit.</p>	
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		<p>Onsite audit:</p> <p>During this audit, auditor team has visited the smallholder sample from KUD Mulus Rahayu, Bhirawa Bhakti, Buatan Jaya and Kebun Sawit Harapan. All smallholder plot has been equipped with boundary poles. All boundary poles were in a good condition. Based on the interview with the smallholder and board of KUD's, there is no land dispute issues.</p>	
2.1.2	<p>A documented system for ensuring legal compliance is in place. This system has means to track changes to the law and also includes listing and evidence on evaluation of legal compliance of all contracted third parties, such as: recruitment agencies, service provider and labour contractor.</p>	<p>Public affair department has conducted annual evaluation of legal compliance. The last evaluation is on February 2021. Based on the evaluation document obtained information that there are 7 (seven) new regulation related to plantation business. For example, Government Act No. 36 year 2021 related to payments. According to the evaluation, the company has complied with the regulation. Another regulation that has been evaluated was Presidential Regulation No. 44/2020 and Agricultural Minister Decree No. 38/2020 related to Indonesian Sustainable Palm Oil (ISPO).</p>	Complied
2.1.3	<p>Legal or authorized boundaries are clearly demarcated and visibly maintained and there is no planting beyond these legal or authorized boundaries.</p>	<p>According to the national regulation, land title (HGU) holder shall maintain the condition of boundary poles. Based on field visit concluded that the boundary poles area well maintained. For example:</p> <ul style="list-style-type: none"> • Boundary poles No. 6 Block A15e Afdeling 1 • Boundary poles No. 7 Block A15a Afdeling 1 • Boundary poles No. 8 Block A15a Afdeling 1 • Boundary poles No. 9 Block A15a Afdeling 1 <p>The boundary poles recorded in document no. 002/LAP/KBN-KSP/SSL/X/2020. The poles monitored twice a year. The last monitoring held on 21 – 22 October 2020. All poles reported in good condition.</p>	Complied

Criteria 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.			
2.2.1	A list of contracted parties is available.	<p>Certificate holder has had a list of contractors in mill and estate. Some of the contract as follows:</p> <ol style="list-style-type: none"> 1. EFB transporter on behalf of Parlaungan Panjaitan (Contract No. 002/E2KSP/01/2020 dated 1 January 2020). 2. School Bus on behalf of H. Gusmardi Contract No. 001/E2KSP/01/2020 dated 1 January 2020). <p>Moreover, certificate holder also had a contractual agreement with temporary worker. Until June 2020, estate had 411 contracts whilst mill had 13 contracts. All contract has been registered in local labour agency.</p> <p>Worker contract has completed with some important clause such as:</p> <ul style="list-style-type: none"> • The company policy related to children/underage worker, anti-drugs etc. • Workers payment referred to local minimum payments regulation. • All worker will be register in health insurance and workers insurance according to national regulation. <p>The same regulation also implemented in smallholder scheme. All of contract data kept by Head Clerk in estate and mill.</p> <p>All contract has been verified by the auditor. Based on the interview with the contractor, all working agreement has covered the issues such as occupational safety and health, no underage worker and payments. There are no dispute issues so far.</p>	Complied

2.2.2	All contract, including those for FFB supply, contain specific clause on meeting relevant legal requirements and this can be demonstrated by the third party.	<p>FFB supplier from local contractor:</p> <ol style="list-style-type: none"> 1. CV Mandiri Sentosa PBD-A (2,516 Ha) 2. CV Mandiri Sentosa PBD-R (2,649 Ha) 3. CV Putra Kembar Sentosa PBD-C (8,008 Ha) 4. APPS Berkah Makmur Bersama (749 Ha) <p>According to Asian Agri’s policy regarding to traceability, they have conducted traceability project to verify their supply chain. Refer to sustainability report 2017 – 2018 that can be downloaded in https://www.asianagri.com/images/pdf/2019/Asian%20Agri%20Sustainability%20Report%202017-2018.pdf stated:</p> <p><i>"Asian Agri reinforced its commitment to traceability by engaging Meo Carbon Solution from Germany and SNV from The Netherlands as traceability consultants to assist with our supply chain traceability project. Commencing in October 2018, Asian Agri began supply chain traceability projects in North Sumatra and Riau. These projects complement the first traceability verification programmes for our partner independent smallholders in Jambi Province which began in 2016 and were done in collaboration with IDH and Yayasan SETARA Jambi. These ongoing projects will eventually provide us with recommendations on how to further improve our systems and procedures for a more traceable and responsibly supply chain".</i></p> <p>During this onsite, there are two additional supplier which is APPS Berkah Makmur Bersama (long term agreement) and CV Putra Kembar Sentosa PBD-C. Based on document verification and interview with</p>	Complied

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		<p>Create Share Value (CSV) staff obtained information that both suppliers have been verified and visited by FFB purchasing staff. By visited the suppliers land and tagged the coordinate, mill expected the FFB source comes from traceable and responsible area. The list of legal documents verified as follows:</p> <ul style="list-style-type: none"> • List of supplier member • Coordinate and its overlay RTRW map. • Personal tax identification of CV Putra Kembar Sentosa PBD-C. • Business permit ID. • Trading permit ID. • Environmental permit. • Location permit • Registration of health insurance (BPJS Kesehatan) • Copy of bank account <p>Based on document verification report above, the CSV staff submitted the report of verification to FFB Purchase Department to issue the Agreement Letter (Surat Perjanjian Kerjasama). There is an Agreement Letter on FFB Supply APPS Berkah Makmur Bersama dated 10 February 2020.</p>	
2.2.3	All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour.	<p>Third party contract with some FFB has completed with some important clause such as:</p> <ul style="list-style-type: none"> • The company policy related to children/underage worker, anti-drugs etc. • Workers payment referred to local minimum payment's regulation. 	Complied

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		<ul style="list-style-type: none"> All worker will be register in health insurance and workers insurance according to national regulation. <p>The same regulation also implemented in smallholder scheme. All of contract data kept by Head Clerk in estate and mill.</p>	
Criteria 2.3: All FFB supplies from outside the unit of certification are from legal sources.			
2.3.1	<p>(C) For all directly sourced FFB, Palm Oil Mill (POM) requires:</p> <ul style="list-style-type: none"> Information regarding the geolocation of FFB origins; Proof of ownership status, right/claim of the land by grower/smallholder; If relevant, valid planting/operational/trading license, or is part of a cooperative which allows the buying and selling of FFB. 	<p>As stated in sustainability reports of Asian Agri 2017 – 2018 (2019 still on progress) stated that <i>"Asian Agri reinforced its commitment to traceability by engaging Meo Carbon Solution from Germany and SNV from The Netherlands as traceability consultants to assist with our supply chain traceability project. Commencing in October 2018, Asian Agri began supply chain traceability projects in North Sumatra and Riau. These projects complement the first traceability verification programmes for our partner independent smallholders in Jambi Province which began in 2016 and were done in collaboration with IDH and Yayasan SETARA Jambi. These ongoing projects will eventually provide us with recommendations on how to further improve our systems and procedures for a more traceable and responsibly supply chain"</i>.</p> <p>As stated in sustainability reports of Asian Agri, all FFB supplier has verified by independent verifcator as explained in previous indicator 2.2.2. All FFB supplier in Buatan II has been verified from legal sources and follows the company’s policy related to FFB traceability. For example:</p> <ul style="list-style-type: none"> CV Karya Bersama located in E 101° 50’ 20.24” / S 00° 33’ 10.45” CV Putra Kembar Sentosa located in E 102° 07’ 59.45” / S 01° 14’ 45.95” 	Complied

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<p>2.3.2</p>	<p>For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in indicator 2.3.1.</p>	<p>During this onsite, there are two additional supplier which is APPS Berkah Makmur Bersama (long term agreement) and CV Putra Kembar Sentosa PBD-C. Based on document verification and interview with Create Share Value (CSV) staff obtained information that both suppliers have been verified and visited by FFB purchasing staff. By visited the suppliers land and tagged the coordinate, mill expected the FFB source comes from traceable and responsible area. The list of legal documents verified as follows:</p> <ul style="list-style-type: none"> • List of supplier member • Coordinate and its overlay RTRW map. • Personal tax identification of APPS Berkah Makmur Bersama and CV Putra Kembar Sentosa PBD-C • Business permit ID. • Trading permit ID. • Environmental permit. • Location permit • Registration of health insurance (BPJS Kesehatan) • Copy of bank account <p>Based on document verification report above, the CSV staff submitted the report of verification to FFB Purchase Department to issue the Agreement Letter (Surat Perjanjian Kerjasama). There is an Agreement Letter on FFB Supply No. 01/CSV-KSP/II/2020 dated 10 February 2020.</p> <p>By signed this agreement letter, APPS Berkah Makmur Bersama has officially record as FFB Supplier of Buatan II POM.</p>	<p>Complied</p>
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Principle 3: Optimise productivity, efficiency, positive impact and resilience Implement plans, procedures and systems for continuous improvement.		
Criteria 3.1: There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.		
3.1.1	<p>(C) A business or management plan (minimum of three years) is documented and where applicable, includes a jointly developed business case for Scheme Smallholders.</p>	<p>Certificate holder has provide longterm management plan in document <i>Rencana Jangka Panjang periode 2020 – 2024</i>. This document described the five-year business projection of PT Inti Indosawit Subur.</p> <p>Longterm management plant of PT Inti Indosawit Subur has documented in <i>Rencana Jangka Panjang periode 2020 – 2025</i>. The longterm management plan covered parameter as follows:</p> <ul style="list-style-type: none"> • Planting material (Marihat, Lonsum, Damimas and Topaz) • Hectare statement of mature and immature area • Estimation of production (Tonnes) • Estimation of FFB purchase (for Mass Balance Mill) • Extraction projected (%) • Cost estimation (IDR/Kg) • Estimation of price (IDR/Tonnes) • Estimation of profit (IDR) <p>Through the document, the production of Buatan II was projected to increased. During the audit, Buatan II POM has had average extraction for CPO (20.15%) and KER (5.30%) in 2019. Annual achievement always evaluated by top management.</p> <p>Based on interview with head clerk and sustainability staff, PT Inti Indosawit Subur has started to engage with independent smallholder named Create Share Value (CSV) near the Inti Indosawit Subur’s concession since a couple year ago and renewed annually.</p>

Complied

<p>3.1.2</p>	<p>An annual replanting programme projected for a minimum of five years with yearly review, is available.</p>	<p>PT Inti Indosawit Subur – Simpang Perak Estate was able to demonstrate annual replanting program period 2015 – 2023 as follows:</p> <table border="1" data-bbox="1131 443 1545 911"> <thead> <tr> <th>Year</th> <th>Program</th> <th>Actual</th> </tr> </thead> <tbody> <tr> <td>2015</td> <td>378</td> <td>378</td> </tr> <tr> <td>2016</td> <td>580</td> <td>580</td> </tr> <tr> <td>2017</td> <td>553</td> <td>553</td> </tr> <tr> <td>2018</td> <td>-</td> <td>-</td> </tr> <tr> <td>2019</td> <td>-</td> <td>363</td> </tr> <tr> <td>2020</td> <td>465</td> <td>139*</td> </tr> <tr> <td>2021</td> <td>341</td> <td>-</td> </tr> <tr> <td>2022</td> <td>370</td> <td>-</td> </tr> <tr> <td>2023</td> <td>358</td> <td>-</td> </tr> </tbody> </table> <p>Note: data until April 2020.</p> <p>Scheme Smallholder:</p> <p>The replanting plan was available under “Rencana Pelaksanaan Replanting Kebun Plasma Buatan”. Below is replanting program of Buatan Scheme Smallholder:</p> <table border="1" data-bbox="1131 1220 1545 1361"> <thead> <tr> <th>Year</th> <th>Program</th> <th>Actual</th> </tr> </thead> <tbody> <tr> <td>2019</td> <td>-</td> <td>-</td> </tr> <tr> <td>2020</td> <td>1,252</td> <td>630</td> </tr> </tbody> </table>	Year	Program	Actual	2015	378	378	2016	580	580	2017	553	553	2018	-	-	2019	-	363	2020	465	139*	2021	341	-	2022	370	-	2023	358	-	Year	Program	Actual	2019	-	-	2020	1,252	630	<p>Complied</p>
Year	Program	Actual																																								
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2021	1,268	-																										
2022	1,488	-																										
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2027	1,032	-																										
Total	10,476																											
3.1.3	The unit of certification holds management review at planned term according to the scale and nature of the activities undertaken.	Management review conducted regularly in each semester. The last review of semester I/2020 Buatan II Mill has been conducted on 10 January 2020. Some issues reviewed was the result of external audit		Complied																								

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		<p>RSPO, customer complaint, Visit Agronomy and Engineering findings, internal audit RSPO findings and preparations of corrective action plan.</p> <p>Management review meeting attended by unit head, head clerk, field assistant and sustainability staff. The record of management review is in place.</p> <p>Onsite Audit:</p> <p>During the onsite audit, auditor team also verifying the record of internal audit/visit. Sighted the record of visit in each unit as follows:</p> <ul style="list-style-type: none"> • Visit Agronomy KSP: Report No. VA/KSP/JUN/FULL/01-2020 Full Report, date of visit 22 – 26 June 2020 by Goh Sudi Wunsen. There were no main issues in this estate, however current issues and recommendation of immature area related to weeding control in circles/path and interrow, manuring, pest & disease, castration, supplying and consolidation, pruning, trenches, road/bridge and harvesting. • Visit Engineering PBS: Report No. VE-PBS-JUN-FULL-01-2020-Full Report, date of visit 13 – 17 July 2020. There were no main issues in this estate. However, there were a key issue related to sterilizer’s body condition including the lock ring gate that worn out. <p>There was also verifying smallholders visit:</p> <p>Record of Deputy Head of Smallholder on 19 June 2020. Based on the minutes of meeting, Deputy Head of Smallholder launched android apps namely “Pembina Sejati” in Buatan Smallholder. This android apps are</p>	
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		<p>very useful for smallholder staff and smallholder itself to reporting the daily activity such as harvesting, upkeep and replanting.</p>	
<p>Criteria 3.2: The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.</p>			
<p>3.2.1</p>	<p>(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impact and opportunities of the unit of certification.</p>	<p>Certificate holder has conducted several trainings in order to empowering independent smallholder through one day coaching clinic namely <i>Pelatihan Dinamika Kelompok</i>. The last has been held on 10 February 2020 and attended by 60 participants (villagers surrounding concessions area).</p> <p>During this replanting preparation, Asian Agri also conducted awareness training related to replanting procedure on 2 April 2020 in KUD Bhirawa Bhakti. The training attended by 25 representatives participants.</p> <p>Onsite Audit:</p> <p>During the audit obtained information related to improvement in smallholder management by using Android Apps namely "Pembina Sejati". This android apps are very useful for smallholder staff and smallholder itself to reporting the daily activity such as harvesting, upkeep and replanting. This apps intended to increase transparency and trust between smallholder and management unit.</p> <p>In addition, the management of Kebun Plasma Buatan has conducted the annual schedule of awareness/socialization and refreshment training to updating smallholder's knowledge and awareness related palm oil sustainability. For example:</p>	<p>Complied</p>

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		<ul style="list-style-type: none"> Sustainability awareness, first aid and integrated pest management training on 19 February 2021 located in meeting room of Plasma Buatan. This training attended by 13 representatives participant from smallholder. Basic fire training, Occupational Safety and Health and HCV management training on 26 November 2020, located in meeting room Buana Bakti Village. Due to Covid 19 pandemic, the attendance is limited to the representatives from respective KUD's, which is only 29 participants. 	
3.2.2	As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat by Certification Body during Annual Surveillance Assessment by using the RSPO metrics template.	<p>Based on explanation of management representatives, until audit finish the RSPO Metric Template still not finalized. Certificate holder only submit their ACOP's.</p> <p>In accordance with ACOP 2019, certificate holder has been submitted the ACOP report to the RSPO secretariat on 4 June 2020. According to the report, certificate holder has a program to supporting independent smallholder groups.</p>	Complied
Criteria 3.3: Operating procedures are appropriately documented, consistently implemented and monitored.			
3.3.1	(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.	<p>Certificate holder has had standard operational procedure for operational activity in estate and mill as follows:</p> <p>Standard Operational Procedures (SOP) for estate that covering entire operational activity as follows:</p> <ol style="list-style-type: none"> SOP AA-APM-OP-1100.01-R4 dated 5 September 2016: <i>Pembibitan</i> (Nursery). SOP AA-APM-OP-1100.02-R3 dated 10 June 2015: <i>Penanaman Areal Baru</i> (New Planting). 	Complied

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		<ol style="list-style-type: none"> 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). 10. SOP AA-APM-OP-1100.10. R6 dated 23 November 2016: <i>Pengendalian Hama dan Penyakit</i> (Pests & Disease Control). 11. SOP AA-APM-OP-1100.11. R1 dated 1 February 2009: <i>Pestisida dan Pengendaliannya</i> (Pesticide Handling). 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. 13. SOP AA-APM-OP-1100.13. R3 dated 4 March 2016: <i>Tunas Pokok</i> for (Pruning). 14. SOP AA-APM-OP-1100.14. R3 dated 16 February 2017: <i>Sensus dan Identifikasi Pokok</i> (Census and Palm Identification). 15. SOP AA-APM-OP-1100.15. R2 dated 1 October 2010: <i>Sensus Produksi</i> (Production Census). 16. SOP AA-APM-OP-1100.16. R1 dated 1 February 2009: <i>Konsolidasi Pohon Tumbang</i> (Provision of Support to Fallen Palm). 17. SOP AA-APM-OP-1100.17. R1 dated 23 October 2014: <i>Pengelolaan</i> 	
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		<p><i>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>Mill SOP's:</p> <ol style="list-style-type: none"> 1. SOP AA-MPM-OP-1400.02.R2 dated 1 September 2011: <i>Stasiun Penerimaan</i> for FFB Receiving Station; 2. SOP AA-MPM-OP-1400.03.R1 dated 1 February 2009: <i>Stasiun Rebusan</i> for Sterilizer; 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</i> 	
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		<p><i>Pengelolaan Limbah</i> for Palm Oil Mill Effluent Treatment;</p> <p>13. SOP AA-MPM-OP-1400.14-R2 dated 1 September 2011: <i>Stasiun Penimbunan dan Pengiriman CPO dan Kernel</i> for CPO and PK Bulking and Despatch Operation;</p> <p>14. SOP AA-MPM-OP-1400.15-R1 dated 1 February 2009: <i>Perawatan</i> for Preventive Maintenance;</p> <p>15. SOP AA-MPM-OP-1400.19.R2 dated 1 September 2011: <i>Manajemen dan Metode Menghitung Emisi Gas Rumah Kaca (GHG)</i></p> <p>16. SOP AA-MPM-OP-1400.18-R4 Book Keeping</p> <p>17. AA-MPM-OP-1400.17-R6 Traceability</p> <p>Scheme Smallholder: 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) 	
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		<ul style="list-style-type: none"> • AA-FA-220-2-RO <i>Stempel (Stamp)</i> • AA-MPM-OP-1400-17-R6 <i>Ketertelusuran (Traceability)</i> dated 1 September 2017 • AA-APM-OP-1100.02-R3 <i>Penanaman Area Baru (New Planting)</i> • AA-SOP-ES-6001-R4 <i>Audit Internal Sustainability (Internal Audit Sustainability)</i> • AA-KL-12-EFP <i>Restorasi Riparian dan Areal di Sekitar Danau/Waduk dan Mata Air Lainnya (Restoration of Riparian Area or Near Area of Lake/Damp or Water Sources)</i> dated 1 August 2010 • AA-HR-305.2-RO <i>Rekrutmen dan Seleksi Karyawan (Recruitment and Selection of Employee).</i> <p>Onsite Audit: During onsite audit, auditor has conducted field visit to the Simpang Perak Estate as follows:</p> <ul style="list-style-type: none"> • EFB application B19e Afdeling 2 Unit management using EFB in immature palm to enrich the soil fertility, maintain soil moisture and reducing weeding especially in circle. EFB placing in each palm circle with dosage 27 ton/Ha or equal to 200 – 250 kg/palm. • Replanting area Block B21e Afdeling 2 Replanting using heavy weight, there is no fire usage. • Fertilizer application Block H15n Afdeling 1 According to fertilizer recommendation, Simpang Perak Estate conducted fertilizer application using AC with dosage 2.5 kg/palm. The fertilizer applicator can demonstrate the application and safety working procedure. • Land application Block B16l Afdeling 4 	
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		<p>Unit management using POME in newly mature area to enrich the soil fertility and production with dosage 800 m³/Ha/year.</p>	
<p>3.3.2</p>	<p>A mechanism to check consistent implementation of procedures is in place.</p>	<p>Onsite Audit: Own estate & mill: VA KSP: Report No. VA/KSP/JUN/FULL/01-2020 Full Report, date of visit 22 – 26 June 2020 by Goh Sudi Wunsen. There were no main issues in this estate, however current issues and recommendation of immature area related to weeding control in circles/path and interrow, manuring, pest & disease, castration, supplying and consolidation, pruning, trenches, road/bridge and harvesting.</p> <p>VE PBD Report No. VE-PBD-FEB-FULL-01-2021-Full Report, date of visit 8 - 15 February 2021 by Sahat M. Sibuea. There were no main issues in this mill. However, there were a key issue related to sand cyclone and boiler.</p> <p>Scheme smallholders: There was a record of Deputy Head of Smallholder on 19 June 2020. Based on the minutes of meeting, Deputy Head of Smallholder launched android apps namely "Pembina Sejati" in Buatan Smallholder. This android apps are very useful for smallholder staff and smallholder itself to reporting the daily activity such as harvesting, upkeep and replanting.</p> <p>The advisory visit scheduled annually. Generally conducted on July.</p>	<p>Complied</p>

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3.3.3	Records of monitoring and any actions taken are maintained and available.	<p>Certificate holder conducted monitoring of operational activity in all level of workers. Each field supervisor has equipped with monitoring sheets/worksheets. For example, harvesting supervisor collected harvesting record and quality of each harvesters. The report submitted to estate manager daily.</p> <p>Therefore, daily operational activity also recorded in daily worksheet by mill supervisor before reported to the mill manager.</p> <p>To ensuring the result of operational activity in line with the procedures, mill/estate manager conducted regularly monitoring of and management review to solve the findings issues. All results of management review shall be implemented by respective staff.</p>	Complied
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.			
3.4.1	(C) SEIA in new planting or operation including mills, is conducted independently and participatively by involving the affected stakeholders, inclusive of impact assessment from the smallholder/outgrower scheme (if any). The assessment is to be documented.	<p><u>Environmental Impact Assessment (EIA):</u> Environmental impact assessment are available under documents, i.e:</p> <ul style="list-style-type: none"> - PT. Inti Indosawit Subur – Buatan Group has demonstrated a document of, tentang Studi Analisis Dampak Lingkungan (ANDAL) Perkebunan Kelapa Sawit Pola PIR-Transmigrasi dan Pabrik Minyak kelapa Sawit (PMKS) di Kabupaten Kampar, Indragiri Hulu dan Bengkalis, Propinsi Riau, mill capacity 30 tonnes FFB/hours. - PT. Inti Indosawit Subur – Buatan Group has demonstrated a document Environmental Management and Monitoring Document “Dokumen Pengelolaan dan Pemantauan Lingkungan” year 2009. The document has been approved by Governor of Riau through “Surat Keputusan Gubernur Riau No.Kpts.975/X/2009 tentang Penetapan Dokumen Pengelolaan dan Pemantauan Lingkungan Penambahan Kapasitas Produksi Pabrik Minyak Kelapa Sawit PT. Inti Indosawit Subur dan Kegiatan Pendukungnya, Sentral Workshop 	Complied

		<p>Buatan dan Pembuatan Laboratorium Kultur Jaringan Berlokasi di Kecamatan Pangkalan Kerinci dan Kecamatan Pelalawan, Kabupaten Pelalawan; Kecamatan Kerinci Kanan dan Kecamatan Dayun, Kabupaten Siak, Provinsi Riau” – dated 28th September 2009. Mill capacity 60 ton FFB/hour.</p> <ul style="list-style-type: none"> – Kernel Crushing Plant and Biogas Plant; the EIA is available under document “UKL-UPL (Environmental Management Effort / Environmental Monitoring Effort)” year 2012. Capacity of KCP 260 MT/day. UKL UPL has been approved by Local authorities through letter No.660/BLH-AM/2012/202 dated February 2012. Identified impacts: domestic solid waste, POME, hazardous waste, emission, dust, and noise from KC activities. – KUD (cooperative) holds a set of copy of latest AMDAL documents in the Cooperative office, similar to company. EIA of scheme small holder has been covered by the “Dokumen Pengelolaan dan Pemantauan Lingkungan”, for mill with capacity 60 tonnes FFB/hour, Own Estate 5,781 hectares, and Plasma 12,000 hectares. The EIA (DPPL) has met the applicable requirement and has been approved on 2009 through Governor Decree number Kpts.975/X/2009 dated 28th October 2009. <p>The environmental impact assessment carried out by PT. Holistika Primagrahita with team consist of: Team leader: Ir.Nur Iskandar (Fisheries/AMDAL B); Physic/Chemical team: Azni Hamzah, S.Si (Chemical/AMDAL B); Biology team: Khairunnazmi, S.Pi (Aquatic biology/AMDAL B), Marualat Harahap (Agriculture/AMDAL B); Activity: Marualat Harahap (Agriculture/AMDAL B); Social team: Yandra Mufialdo, S.Sos (Social economy); Mapping: M.Irsyadul Anwar, S.Pi</p>	
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		<p>All significant impacts have been identified i.e. reduction of soil and water quality, reduction of air quality, impact to socioeconomic of local community, etc. Plan to monitor and manage of each identified environment impact have been provided and documented. The EIA document contained evidence of involvement of surrounding community during study and public consultation with relevant stakeholder.</p> <p>The impact assessment for replanting has identified impacts such as: changes in micro climate, a decrease in air quality, increase in noise level, quantity and quality of surface water, soil erosion and sedimentation, loss of flora and fauna, disturbance to aquatic biota, community health and surrounding environment health.</p> <p>The document has also completed with environmental management and monitoring plan. The plans were explaining type of impact, source of impact, impact parameter, management purpose, management and monitoring plan, management/monitoring location, management/monitoring timeframe.</p> <p><u>Social Impact Assesemnt (SIA)</u> PT Inti Indosawit Subur – Buatan POM has also shown the document of Social Impact Assessment PT Inti Indosawit Subur Kebun Buatan di Kabupaten Siak dan Kabupaten Pelalawan Propinsi Riau, in 2009 by Fakultas Kehutanan Institut Pertanian Bogor. Assessment of aspects of social impacts is done by several methods, including:</p> <ul style="list-style-type: none"> - Focus Group Discussion (FGD) - Deep interview - Structured Interviews 	
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		<p>During preparation for Social Impact assessment team and company management have involved communities through interviews and meetings with village peoples, farmers, village officials and regency officials. Record of meeting with affected parties and stakeholder are available and can demonstrated. Evidence of participation with affected parties is to use a questionnaire conducted on 13- 19 April 2009, questionnaires can be demonstrated at the time of the audit</p>	
<p>3.4.2</p>	<p>For the unit of certification, a SEIA is available and social and environmental management plan and its monitoring have been developed with participation of affected stakeholders.</p>	<p>PT Inti Indosawit Subur – Buatan POM has prepared the plans for management and monitoring of environmental and social impacts to avoid or reduce negative impacts and promote positive ones presented in “Rencana Kelola Dampak Sosial dan Rencana Pemantauan Dampak Sosial year 2019-2020”. The plan consisted of:</p> <ul style="list-style-type: none"> – Farmers still lack understanding regarding internal control system (ICS) - level of understanding is about 75%, management plans: conducting training programs related to understanding the ICS and RSPO. – Misunderstanding of Sorting FFB at fruit collection sites (TPH) between farmers and Mill, management plan: Socialization to farmers related to regulation of Permentan no. 14/2013 concerning the “Pelaksanaan sortasi”. – Impact of dust on the dry season caused by FFB transport activities to the mill, management: the company performs scheduled watering every day in the morning and evening. – Scheme smallholder PIR Plasma faces constraints in income generation in the face of replanting, management: coaching on other farming, cooperation in replanting and engage scheme smallholder in the work of replanting. <p>In 2020, the environmental management plan was explaining the review and evaluation upon impact from operational activity that has been performed and activity that was going to be performed.</p>	<p>Complied</p>

		<p>Evaluation upon impact from ongoing activities such as:</p> <ul style="list-style-type: none"> - Impact from main activities in oil palm plantation (spraying activity, natural vegetation conservation) - Impact from main activities in palm oil mill (utilization of palm oil mill manpower, FFB processing, palm oil mill effluent management, land application of palm oil mill effluent, application of empty fruit bunch, transport of crude palm oil, palm kernel and logistics, provision and use of clean water). - Impact from supporting activities (energy source operation, central workshop operation, temporary hazardous waste storage, landfill operation); <p>Review and evaluation upon future activities, such as:</p> <ul style="list-style-type: none"> - Activity in tissue culture in laboratory - Replanting activity; within the replanting activity review, team has identified type of impact such as: change in micro climate, air quality decrease, increase of noise, dynamics in quantity and quality of surface water, erosion and sedimentation, decrease in terrestrial flora and fauna, disturbance in aquatic life, effect on community health. <p>The document has also completed with environmental management and monitoring plan, gives description type of impact, source of impact, impact parameter, management objective, management/monitoring plan, period of management/monitoring, PIC for management/monitoring.</p> <p>For Smallholder scheme, the type of environmental impact from their oil palm plantation such as: water pollution -> control the spraying and fertilizer application, avoid spraying near water body; soil erosion -> no blanket spraying, frond stacking, degradation on wildlife -> no hunting.</p>	
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		Social impact assessment has included the smallholder area and pay attention to the impacts of smallholder schemes. Data verified: Form of consultation with affected parties dated 46 th April 2019, e.g: Mr Anisar (45 years old – address: Kerinci Kota Village), Mr Marlis (49 years old – address: Kerinci Kota Village), Mr Amat (47 years old – address: Kerinci Kanan Village).	
3.4.3	(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in participatory way.	<p>PT Inti Indosawit Subur and Scheme smallholder have reviewed the document of plan for management and monitoring of social impacts to avoid or reduce negative impacts and promote positive ones presented in document of:</p> <ul style="list-style-type: none"> – “Data Laporan Review Sosial Impact Assessment (SIA) Dengan Masyarakat Semester II tahun 2019” – “Laporan Izin Lingkungan Kegiatan Perkebunan dan Pabrik Pengolahan Kelapa Sawit PT. Inti Indosawit Subur Buatan” period first semester 2020 (January to June 2020). The report has submitted and accepted by relevant authorities through Environmental Electronic Report (SIMPEL) to Ministry of Environmental and Forestry, dated 10th August 2020. ID TTE: 1551798233-1744. PMKS Buatan <p>PT Inti Indosawit Subur – Buatan Group has appointed the responsible person for the implementation and monitoring of EIA document is Manager (Mill, Estate and Plasma) as explained in Job Profile Manual for Manager, point 2 mentioned “Responsible on implementation of environmental permit document and monitoring each six months”</p>	Complied
Criteria 3.5: A system for managing human resources is in place.			
3.5.1	Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives in accordance with the applicable regulation.	PT Inti Indosawit Subur – Buatan II POM has prepared a procedure for hiring workers regulated that hiring and promotion of workers based on skill, work experiences, and job evaluation. Procedure for worker recruitment (SDM-A-001-00) and procedure for employee assessment (HRD C-002-00) was available and mentioned there was no	Complied

		<p>discrimination treatment during recruitment and promotion process. Promotion of worker will be done base on work period, annual evaluation result, and availability of position</p> <p>In the recruitment process, the company has set the standard of competence that inferred in the Position Description and Job Profile. Recruitment selection, hiring and promotion has based on skills, capabilities, qualities, and medical fitness.</p> <p>Job opportunities were communicated and given to surrounding villagers at first-priority where no discrimination found observed during interview and related records of workers being employed. All worker has treated equally in accordance with company regulation including rights of worker as well. The compliance in accordance with national laws has evaluated by the organization as described in criterion 2.1. Annuals performance evaluation result of worker has shown.</p>	
3.5.2	Employment procedures are implemented and records are maintained.	<p>PT IIS has established mechanism related to the employees and payments of wages, including:</p> <ol style="list-style-type: none"> 1. SOP recruitment and employee selection No. SOP: AA-HR-305.2-R0 dated 1 February 2009 regarding "<i>penerimaan karyawan baru</i>" (recruitment and selection of employee), explained that: When candidates have passed in the process of selection, next recruitment sends the candidate in full data system averis into HR-it) to be made an agreement work (made 2 duplicate and should be sign by candidates in question. <p>For example: Perjanjian Kerja Harian Lepas – Daily worker agreement No. 013/PKHL/KTS/12/2020 dated 15 Desember 2020 on behalf of Dervi</p>	Complied

		<p>Sitohang as Child Care worker at pondok batu. This Daily worker agreement has made duplicate.</p> <ul style="list-style-type: none"> - PT Inti Indosawit Subur – Buatan II POM and Estate has issued the specific labour policy and procedures for temporary workers (PHL/PKWT); The policy and procedure are issued for each unit at PT Inti Indosawit Subur – Buatan II POM and Estate has issued the specific labour policy and procedures for temporary workers (PHL/PKWT); The policy and procedure are issued for each unit as Simpang Perak Estate and POM: Memorandum No. 94/ES-KSP/MEMO/08/2020, dated 10 August 2020. <p>The policy and procedure has been communicated to workers, especially to temporary workers at Buatan II POM and Simpang Perak Estate on 11 August 2020. The procedure was explain the detail of mechanism for temporary workers recruitment, promotion of temporary workers to be permanent workers, term and condition and requirement of temporary workers in accordance with National regulation (UU No. 13 tahun 2003).</p> <ol style="list-style-type: none"> 2. Company has established a mechanism to handle complaint from external party, as written in "<i>Mekanisme Penanganan Keluhan</i>" – complaint handling mechanism (Doc. No.SOP AA-GL- 5005-RO 01) while complaint from internal regulated under "<i>Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan</i>" – Employee' complaint and resolution mechanism (Doc. No.SOP-AA-HR-3008-RO 05). 3. SOP related to the payments No. AA-FA-219.1-R1: "Pengupahan" (Wages) dated 1 January 2008. 	
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Criteria 3.6: An Occupational health and safety (H&S) plan is documented, effectively communicated and implemented.

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<p>3.6.1</p>	<p>(C) All operational activities risks assessed to identify the H&S issues. Mitigation plans and procedures are documented and implemented.</p>	<p>PT Inti Indosawit Subur – Buatan POM have been established a health and safety policy under “Kebijakan Perusahaan”, updated 1st December 2019, was signed by Managing Director. In point 3, the company commit to implement and maintain occupational health and safety management system in compliance with national and international applicable regulation. Point 5. Integrating social, environmental, food security, occupational health and safety issues into operational activities, adopting best technology available, and maintain trained manpower, with skills, and motivated to improve performance through continuous improvement program. The policy was also displayed at in public board in Buatan II POM, in each Division Office and Simpang Perak Estate Office.</p> <p>The document of OHS Program available under “Program Manajemen K3 PMKS Buatan II - PT Inti Indosawit Subur Tahun 2020”, such as:</p> <ul style="list-style-type: none"> – Established the document of hazard identification, risk assesment and its control – Meeting on safety committee/P2K3 (monthly basis) – Report of OHS committee/P2K3 (3 months bases) – Training of emergency response and preparedeness (annually) – Safety briefing (daily) – Providing the PPE for all employees – Inspection on PPE usage – Training for operator in POM and workshop <p>PT Inti Indosawit Subur – Buatan POM has also prepared the procedure to identify and prepare a risk assesment. The updating risk assesment is documented on HIRAC Buatan, dated 1 Feb 2019, rev. 21. Replanting activities are also provided in the updated risk assesment. This Risk Assesment is applicable to all Cooperatives (KUD’s) within the certificate scope. The risk in smallholders is more about PPE use during their activities (harvesting and fertilizing).</p>	<p>Complied</p>
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		<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>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><u>Scheme smallholder</u> ICS has established the policy related to EHS as per "Kebijakan Manager Group ICS", dated 2nd January 2017. In point 3 mentioned: to pay attention and implementing health and safety culture, using personnel protective equipment, if necessary, in performing daily work and to maintain the work premises.</p> <p>Group ICS has also demonstrated under "Program Manajemen K3 Kebun Plasma PT Inti Indosawit Subur tahun 2020, program such as:</p> <ul style="list-style-type: none"> - Inspection and monitoring on using of PPE for harvester – daily - Training on emergency and preparedness – once a year - Training of first aider and monitoring of first aid kit - Refresh training of OHS including risk assessment. 	
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		Record of implementation the OHS program provided in indicator 3.6.2.	
3.6.2	(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.	<p>PT Inti Indosawit Subur – Buatan II POM has demonstrated the record of realization the OHS program 2020, such as:</p> <ul style="list-style-type: none"> – Safety shoes was provide twice a year for all process operator including mechanic. Monitoring of PPE usage can be demonstrated on document “Monitoring penggunaan APD” period January - December 2020 for each station. – Report of MCU for all workers in Buatan II mill, was conducted by “Klinik Asian Agri Sehat Buatan”, dated 10 December 2020 was attended by 52 workers. The MCU was covered urine test, HSaAg and fysical test. – Monitoring of emergency response and peparedeness facilities, i.e: fire hydrant (76 units) and fire extinguisher (11 units), updated in March 2021, location in Buatan II POM. <p>PPE provision for all workers at Simpang Perak Estate are demonstrated as per “Bukti Serah Terima Alat Pelindung Diri”. Sample seen:</p> <ul style="list-style-type: none"> – PPE AP Shoes provision for fertilizer workers Simpang Perak in Octoberl 2020, received by 24 workers – PPE Hand Gloves provision for fertilizer workers on 15 December 2020 received by 14 workers <p>Based on field viist on for spraying workers in Simpang Perak Estate and All KUD’s sample the risk impact probability was irritate and eyes disease, control by using appropriate PPE (eye wear/safety glasses, masker and handgloves) and regular training for sprayer workers.</p> <p>During Pandemic Covid-19, company has develop the business continuity plan (BCP) as a health protocol to prevent the covid-10 outbreak. The health protocol during working such as:</p>	Complied

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		<ul style="list-style-type: none"> - Temperature check before working, if the body temperature > 36.5° C the workers must be referred to the clinic and may not work for further examination - Applying 3M (washing hands, keeping a social distancing and using a masker everywhere) - Restrictions on the movement of employees in and out of the plantation area and monitor the employees movement through permit. <p>Based on interview and verification, there is no case of positif covid-19 in PT Inti Indosawit Subur – Buatan II POM and Estate.</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 P&C Principles, in a form they understand and includes assessment of the training.</p>	<p>PT Inti Indosawit Subur – Buatan Group (Including Scheme smallholder) has a department which is responsible for the training program, which is the Asian Agri Learning Institute. The department has a 2020 training program recorded in the year 2020 training calendar including Estate and Mill.</p> <p>Through its employee data (master of Employees) and training data personal records, the Asian Agri Learning Institute Department will recommend the Estate and Mill to participate in a training program annually and will also evaluate the effectiveness of the training that has been followed.</p> <p>The training program is divided into several aspects: technical, Administration, Environments & Sustainability and special certifications and there are also training involving vendors or operational suppliers</p> <p>PT Inti Indosawit Subur – Buatan Group (Including Scheme smallholder) has shown the document of training program related to the aspects of RSPO Principles and Criteria has shown under "Program Pelatihan</p>	<p>Complied</p>

		<p>Karyawan PMKS Buatan Satu PT Inti Indosawit Subur – 2020”, consist of:</p> <ul style="list-style-type: none"> – Sustainability awareness – (supply chain, traceability), – Basic safety training (refreshment), – Training of basic fire (refreshment – Training on TPM (Total productive maintenance), – Training of work instruction (WI) – refreshment, – Training on preparedness and emergency response, – Awareness training of RSPO PnC for smallholder member – Training of HCV Z(refreshment) – Training for first aider – Training on handling of limited pesticide for operator sprayer (TUS) – Training of fertilizer application 8, <p>The implementation of training program available in indicator 3.7.2</p>	
3.7.2	Records of training are maintained, where appropriate on an individual basis.	<p>Document of training record has demonstrated, such as:</p> <ul style="list-style-type: none"> – Refreshment training for OHS, HCV and basic fire dated 30 October 2020 – Refreshment training of RSPO requirement include PnC and SCCS dated 10 February 2020, location “Gedung Serba Guna Pekanbaru” – Refreshment training for fertilizer application, dated 16th September 2020 – Training of PPE usage for harvester dated 14-19 January 2020 – Technical road maintenance training, conducted on 3 May 2020. – Basic Fire training, conducted on 6 November 2020 – Traceability training and book keeping for supply chains, conducted on 10 October 2020. – Socialization of Pandemic Covid-19 for all communities/employees from the housing held on March 26, 2020. <p>Record training for individual basis has also maintained, such as:</p>	Complied

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		<ul style="list-style-type: none"> - Mr In**m* (dispatch operator), consisted of: Training SOP Mass Balance and SOP Traceability" dated 15 May 2019; "Training Traceability and Mass Balance" dated 8 May 2018; refreshment training of RSPO requirement include PnC and SCCS dated 10 February 2020, Refreshment training for OHS, HCV and basic fire dated 30 October 2020 - Mr M*st*q*m (harvester), consist of: Refresh training on harvesting (20 May 2013), refresh training of PPE usage for harvester dated 14-19 January 2020, Refreshment training for OHS, HCV and basic fire dated 30 October 2020 - Mrs S*t**m (spraying applicator), consist of: Training on limited pesticide handling (26 September 2016), refresh training on chemical/pesticides handling (28 June 2018), refreshment training for OHS, HCV and basic fire dated 30 January 2020, Refreshment training for fertilizer application, dated 16th September 2020 	
3.7.3	Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.	Training for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS) has been carried out by company on 26 January 2021. Training attend by 7 participants (Mill Manager, Production clerk, weighbridge clerk, KTU/administration, Dispatch and Sustainability team). Evidence of training can be demonstrated. During interview with mill personel confirmed that they have understand regarding the RSPO SCCS implementation and process in Buatan II Palm Oil Mill.	Complied
Criteria 3.8: Supply chain requirements for mills.			
Procedure note: all requirements are classified as Critical Indicators . However it will not contribute to suspension if there is more than 5 non-compliance within a principle)			
3.8.1	<p>Identity Preserved Module</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the</p>	PT. Inti Indosawit Subur – Buatan II POM holds current RSPO P&C Certificate No. RSPO 638947, first certification start on 16 September 2010 and expired on 15 September 2020. In the current certificate, PT.	Complied

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	<p>RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.</p> <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.</p>	<p>Inti Indosawit Subur – Buatan II POM uses Mass Balance supply chain model.</p>	
<p>3.8.2</p>	<p>Mass Balance Module</p> <p>A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	<p>PT. Inti Indosawit Subur – Buatan II POM holds current RSPO P&C Certificate No. RSPO 638947, first certification start on 16 September 2010 and expired on 15 September 2020. In the current certificate, PT. Inti Indosawit Subur – Buatan II POM uses Mass Balance supply chain model. The mill only claimed the FFB proportion from certified supply bases which comprise of company-own estate (Simpang Perak Estate) and 9 scheme Smallholder in form of cooperative/Koperasi Unit Desa (KUD). The proportion of non-certified FFB comes from third-party supplier (6 Supplier: CV Mandiri Sentosa (PBD-A), CV Mandiri Sentosa (PBD-R), CV Putra Kembar Sentosa PBD-C, APSS Berkah Makmur Bersama, PT Teguh Karya Wana Lestari, and TKD). FFB Non certified approximately 34% from total FFB received by Buatan II POM.</p>	<p>Complied</p>
<p>3.8.3</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. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p>	<p>The estimated tonnage of certified CPO and PK that could potentially produced by PT. Inti Indosawit Subur – Buatan II POM its recorded in RSPO Public Summary report, certificate and RSPO IT Paltform.</p> <p>The mill has met registration and reporting requirement as it registered in RSPO IT Platform (PalmTrace) with ID number RSPO_PO1000000382. Below are the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year 2020:</p> <p><u>Forecast volume (August 2019 – July 2020)</u></p> <p>FFB : 211,524 MT</p>	<p>Complied</p>

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		<p>CPO : 40,979 MT (OER: 19.37%) PK : 11,215 (KER: 5.30%) <u>Actual production volume (August 2019 –July 2020)</u> CPO: 42,304.98 MT PK: 11,757.17 MT <u>Actual sold volume (August 2019 –July 2020)</u> CPO: 17.50 MT, Most of CPO certified Sold as ISCC PK: 9,269.25 MT</p>	
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	<p>PT. Inti Indosawit Subur – Buatan II POM is subsidiary of PT. Inti Indosawit Subur, a member of RSPO, with RSPO membership No.1-0022-06-000-00 since 6 February 2006. PT Inti Indosawit Subur – Buatan II POM has meet all registration and reporting requirements. RSPO IT Platform/PalmTrace account RSPO_ PO1000000382.</p>	Complied
3.8.5	<p>Documented procedures The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ol 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 mill’s procedures for the implementation of this standard. 	<p>PT. Inti Indosawit Subur – Buatan II POM can demonstrate procedures as follow:</p> <ul style="list-style-type: none"> Standard Operating Procedures – Traceability (AA-MPM-OP-1400.17.R7) dated 1 October 2019. The procedures cover traceability of CPO and PK, since FFB receiving from Simpang Perak Estate and Smallholder, processing up to shipping of CPO and PK as well as daily production report. The procedure also regulates the internal audit by Sustainability Internal Audit Manager. Traceability records are to be kept for 10 years. Standard Operating Procedure – Book Keeping (AA-MPM-OP-1400.18-R4). The procedure explains method to check only certified product received. The book keeping mass balance stated every 3 months: January-March, April-June, July-September, and October-December each year. Head of Environment and 	Complied

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	<p>d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBS including ensuring no contamination in the IP mill.</p>	<p>Sustainability will inform to Certification Body in the case of projected overproduction.</p> <ul style="list-style-type: none"> • SOP for mill operation Mill Policy Manual: <ul style="list-style-type: none"> - SOP AA-MPM-OP-1400.02.R2 Stasiun Penerimaan for FFB receiving station; - SOP AA-SOP-OP-101.5-R0 Grading; - SOP AA-MPM-OP-1400.03.R1 Stasiun Rebusan for sterilizer; - SOP AA-MPM-OP-1400.04.R1 Stasiun Pemisahan Berondolan for loose fruit separation; - SOP AA-MPM-OP-1400.05-R1 Stasiun Pengadukan dan Pengempaan for pressing station; - SOP AA-MPM-OP-1400.06-R1 Stasiun Pemurnian for clarification; - SOP AA-MPM-OP-1400.07-R1 Stasiun Pemisahan Nut dan Fiber for nut and fiber separation; - SOP AA-MPM-OP-1400.08-R1 Stasiun Kernel for kernel station; - SOP AA-MPM-OP-1400.09-R1 Stasiun Boiler; - SOP AA-MPM-OP-1400.10-R1 Stasiun Engine Room; - SOP AA-MPM-OP-1400.11-R1 Stasiun Water Treatment; - SOP AA-MPM-OP-1400.12-R1 Laboratorium; - SOP AA-MPM-OP-1400.13-R1 Stasiun Pengelolaan Limbah for palm oil mill effluent treatment; - SOP AA-MPM-OP-1400.14-R2 Stasiun Penimbunan dan Pengiriman CPO dan Kernel for CPO and PK bulking and despatch operation; - SOP AA-MPM-OP-1400.15-R1 Perawatan for preventive maintenance; - SOP AA-MPM-OP-1400.18-R4 Book Keeping - SOP AA-MPM-OP-1400.17-R7 Traceability <p>PT. Inti Indosawit Subur – Buatan II POM is able to demonstrate complete and up-to-date records and report demonstrating compliance</p>	
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		<p>with the supply chain’s general requirement and modular requirement, including training records.</p> <p>As per Procedure of Traceability (AA-MPM-OP-1400.17-R6), the responsible person in charge to the supply chain system is Mill Manager. During audit, the mill manager is able to demonstrate sufficient knowledge and understanding on RSPO supply chain implementation for palm oil mill.</p> <p>PT IIS Buatan II POM has a procedures for receiving and processing certified and non-certified FFBS including ensuring no contamination in the IP mill, as described in SOP AA-MPM-OP-1400.17-R7 Traceability, dated 1 October 2019. However Buatan II POM was apply Mass Balance system.</p>	
<p>3.8.6</p>	<p>Internal Audit</p> <p>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill;</p> <p>a) Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>b) Effectively implements and maintains the standard requirements within its organisation.</p> <p>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p>	<p>PT. Inti Indosawit Subur – Buatan II POM has a procedure to conduct internal audit RSPO, including RSPO SCCS as per Procedure of Traceability (AA-MPM-OP-1400.17-R7) chapter 6.7, Sustainability Internal Audit Manager conducted internal audit annually, to ensure all operational and documentation activities are comply with the requirement in RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. Internal audit for all scheme including RSPO SCCS also refer to SOP Internal Audit Nomor: AA-SOP-ES-6001-R5 dated 1 August 2020; Chapter 4.0 stated that Internal audit conducted minimum once a year considering the critical area.</p> <p>Latest internal audit 2020 conducted on 21 August 2020 by Hendrik Simanjuntak, Ridho Ilahi, Ian Septian Arifin.</p> <p>Internal audit report were evident, all issue raised during internal audit has been followed up by Corrective Action and Closed.</p> <p>Management review conducted twice a year as per procedure AA-MPM-OP-1400.17-R7. Management review has been conducted on 27 August 2020. Input of management review consist of:</p>	<p>Complied</p>

		<ul style="list-style-type: none"> - Internal audit result - Customer feedback - Proses performance and product conformity - Status of Corrective and Preventive Action - Follow up previous management review - Change that could effect to the management system <p>Output of management review has include:</p> <ul style="list-style-type: none"> - Recommendation for improvement - Resources needed. 	
<p>3.8.7</p>	<p>Purchasing and Goods In</p> <ul style="list-style-type: none"> i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received. ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage. iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents. 	<p>PT Inti Indosawit Subur – Buatan II POM has demonstrated SOP of Traceability (AA-MPM-OP-1400.7.R7), chapter 5.1 indicates the Weighbridge Clerk has responsibility to input data and print weighbridge card based on “Surat Pengantar TBS”, covering information e.g. estate name and block number, mill name, date of delivery, product description and quantity, RSPO certificate number, transporter identity and unique identification number.</p> <p>PT. Inti Indosawit Subur – Buatan II POM receive FFB from certified and non-certified source. Certified source consist of own estate (Buatan Estate) and 9 scheme Smallholder in form of cooperative/Koperasi Unit Desa (KUD). The proportion of non-certified FFB comes from third-party supplier (6 Supplier: CV Mandiri Sentosa (PBD-A), CV Mandiri Sentosa (PBD-R), CV Putra Kembar Sentosa PBD-C, APSS Berkah Makmur Bersama, PT Teguh Karya Wana Lestari, and TKD). FFB Non certified approximately 34% from total FFB received by Buatan II POM.</p> <p>Document “Surat Pengantar TBS” (FFB Delivery Note) and Kartu Timbangan (Weighbridge Card) described identity and location of FFB source and other item required e.g.</p> <p>Certified FFB:</p>	<p>Complied</p>

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		<ul style="list-style-type: none"> - Weighbridge ticket "Kartu Timbangan No.PBDA121102727" dated 3 March 2021, for 305 FFB bunches; nett weight 4,709 kg; from Kebun KKPA Buatan – KKPA Delima Sakti, Afdeling 8, block H03b & H03j; vehicle BM9751CT; Driver: Sugiono; RSPO certificate No.RSPO638947. - Weighbridge ticket "Kartu Timbangan No.PBDA221101787" dated 26 February 2021, for 225 FFB bunches; nett weight 6,301 kg; from KT-46 Sabar Barokah – KUD Bhirawa Bhakti, block BO2013; vehicle BM97822SC; Driver: Nonok; RSPO certificate No.RSPO638947. - Weighbridge ticket "Kartu Timbangan No.PBDA221101859" dated 01 March 2021, for 272 FFB bunches; nett weight 7,558 kg; from KT-139 Tandan Sawit – KUD Buatan Jaya, block BO4001; vehicle BM8968SU; Driver: Selo; RSPO certificate No.RSPO638947. - Weighbridge ticket "Kartu Timbangan No.PBDA221102600" dated 01 March 2021, for 566 FFB bunches; nett weight 5,896 kg; from KT-KVB1 – KUD Mulus Rahayu, block A16c, A16d; vehicle BM8287SU; Driver: Agus Julianto; RSPO certificate No.RSPO638947. - Weighbridge ticket "Kartu Timbangan No.PBDA221102744" dated 03 March 2021, for 573 FFB bunches; nett weight 4,210 kg; from Afdeling 1 – Simpang Perak Estate, block A15j, A15k; vehicle BM8279TZ; Driver: Heri Syaputra; RSPO certificate No.RSPO638947. - Weighbridge ticket "Kartu Timbangan No.PBDA221102743" dated 03 March 2021, for 608 FFB bunches; nett weight 4,530 kg; from Afdeling 4 – Simpang Perak Estate, block D16k, D16m; vehicle BM8098TK; Driver: Anton Siagian; RSPO certificate No.RSPO638947. - Weighbridge ticket "Kartu Timbangan No.PBDA221102775" dated 26 February 2021, for 333 FFB bunches; nett weight 7,560 kg; from KT 213 Bukit Sawitri – KUD Kebun Sawit Harapan, block B06017; vehicle BM9893SU; Driver: Gupis; RSPO certificate No.RSPO638947. <p>Non-certified FFB:</p>	
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		<ul style="list-style-type: none"> - Weighbridge ticket "Kartu Timbangan No.PBDA520106134" dated 27 December 2021, for 774 FFB bunches; nett weight 14,698 kg; from Supplier CV Mandiri Sentosa – ID A008; vehicle B9050VB; Driver: Ramiro; Non Certified. - Weighbridge ticket "Kartu Timbangan No.PBDA520106135" dated 27 December 2021, for 211 FFB bunches; nett weight 3,381 kg; from Supplier CV Putra Kembar Sentosa – ID ST00033; vehicle BM8350TV; Driver: Anto; Non Certified. - Weighbridge ticket "Kartu Timbangan No.PBDA520106123" dated 27 December 2021, for 495 FFB bunches; nett weight 9,409 kg; from Supplier CV Mandiri Sentosa – ID A007; vehicle BM8072SC; Driver: Edi; Non certified. - Weighbridge ticket "Kartu Timbangan No.PBDA520106128" dated 27 December 2021, for 335 FFB bunches; nett weight 6,360 kg; from Supplier Berkah Makmur Bersama – ID ST00034; vehicle BM9536SE; Driver: Sukri; Non certified. 	
<p>3.8.8</p>	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ul style="list-style-type: none"> a) The name and address of the buyer; b) The name and address of the seller; c) The loading or shipment / delivery date; d) The date on which the documents were issued; e) RSPO certificate number; 	<p>PT Inti Indosawit Subur – Buatan II Pal Oil Mill has ensure that the following minimum information for RSPO certified products is made available in document form such as: Sales contract, Delivery Order/Delivery noytes and Weighbridge Ticket. The information are complete and can be presented across a range of documents issued for RSPO certified oil palm products. Sample seen:</p> <p>CPO Contract, Delivery Order and Weighbridge ticket:</p> <ul style="list-style-type: none"> - Sales Contract No. 10002/CC10/02/20 dated 1 October 2020. Buyer name: PT Sari Dumai Sejati; Buyer address; Jl. MH Thamrin No. 31, Kebon Melati, Tanah Anbang, Jakarta Pusat, DKI Jakarta; Delivery date: Soonest; Quantity: 750 MT; Comodity: RSPO Certified CPO; SC Model: Mass Balance; Certificate Number: RSPO 638947; Expired date: 15 December 2020; Specification: FFA max 5%, Moisture and impurities max 0.5%; Price: IDR ***; Seller: PT Inti Indosawit Subur; 	<p>Complied</p>

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	<p>f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations);</p> <p>g) The quantity of the products delivered;</p> <p>h) Any related transport documentation;</p> <p>i) A unique identification number.</p>	<p>Seller address: Jl. MH Thamrin No. 31, Kebon Melati, Tanah Anbang, Jakarta Pusat, DKI Jakarta; Loading port: PT Inti Indosawit Subur – Buatan II POM; Destination port: Kawasan Berikat PT SDS Lubuk gaung.</p> <ul style="list-style-type: none"> - The sales contract was defined into delivery orders: Delivery Order PT. Inti Indosawit Subur No.10002/DC10/02/20 dated 1 October 2020, instruction to PT. Inti Indosawit Subur – Buatan II POM to deliver 750,000 kg commodity Minyak Kelapa Sawit RSPO; Supply Chain Model Mass Balance; No.Ref. RSPO 638947. <p>Delivery Order PT. Inti Indosawit Subur No. 10002/DC10/02/20 dated 1 October 2020, completed with 28 deliveries. Sample dispatch slip CSPO from Buatan II POM to customer:</p> <ul style="list-style-type: none"> - Weighbridge ticket Buatan II POM No.PBDC120101511 dated 06 October 2020. Destination PT. Sari Dumai Sejati. Commodity CPO Certified RSPO. Supply Chain Model Mass Balance. RSPO Certificate No.RSPO638947. DO No.10002/DC10/02/20. Transporter CV. Jasa Bersama, Vehicle No.BM8622RO, Dirver: Jul Hamdani. Volume dispatched 27.780 MT; Seal No. 1037243-1037250; SP No. 003415. <p>This transaction was recorded in PalmTrace as TR-12912243-f813, dated 1 December 2020 for CSPO Mass Balance, volume 628.22 MT. Seller PT. Inti Indosawit Subur – Buatan II POM. Buyer PT Sari Dumai Sejati, confirmation date 16 December 2020.</p> <p>PK Contract:</p> <ul style="list-style-type: none"> - Purchase Contract No.09017/CC10/13/19 dated 15 September 2019 between PT. Inti Indosawit Subur and PT Sari Dumai Sejati. for sales of 200 MT commodity RSPO PK; Supply Chain Model Mass Balance; - The contract was defined into delivery orders: Delivery Order PT. Inti Indosawit Subur No.09017/DC10/13/19 dated 19 September 2019, instruction to PT. Inti Indosawit Subur – Buatan II POM to deliver 	
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		<p>250,000 kg commodity Inti Kelapa Sawit RSPO; Supply Chain Model Mass Balance; No.Ref. RSPO 638947.</p> <ul style="list-style-type: none"> - Delivery Order PT. Inti Indosawit Subur No.09017/DC10/13/19 dated 19 September 2019, fulfilled with 10 deliveries. Sample dispatch slip CSPK from Buatan II POM to customer: <ul style="list-style-type: none"> ✓ Weighbridge Ticket No. PBDC219100511 dated 21 September 2019. Destination PT. Inti Indosawit Subur – Buatan I KCP. Commodity PK Certified RSPO. Supply Chain Model Mass Balance. RSPO Certificate No.RSPO638947. DO No.09017/DC10/13/19. Transporter CV Jasa Bersama, Vehicle No.BM8886RO. Volume dispatched 30,010. Batch No.RSPO638947. <p>This transaction was recorded in PalmTrace as TR-830170e2-1382, dated 13 March 2020 for CSPK Mass Balance, volume 200 MT. Seller PT. Inti Indosawit Subur – Buatan II POM. Buyer PT Sari Dumai Sejati, confirmation date 13 April 2020.</p> <ul style="list-style-type: none"> - DO Transfer Stock from PT IIS – Buatan II POM to KCP Buatan I No. TS: 01315/DC10/13/21 dated 26 January 2020; commodity PK RSPO Mass Balance; RSPO Cert No. RSPO 638947; Quantity 250,000 kg. This DO was deliver in to 14 dispatch slip/weighbridge ticket. Sample of dispatch slip for this Delivery order: <ul style="list-style-type: none"> ✓ Weighbridge Ticket No. PBDC221200050 dated 29/01/2021; Comodity: PK Certified RSPO; DO No. 01315/DC10/13/21; Nett Weight 17,890 kg; Transporter: Buana Jaya Bersama; Vehicle No. BM9547RC; Driver: Efendi L. Tobing; Seal No. 1371247-1371258; RSPO Cert No. RSPO638947. <p>This transaction was recorded in PalmTrace as TR-a2d8461c-3e99 dated 31 January 2021 for CSPK Mass Balance, volume 827.63 MT. Seller PT. Inti Indosawit Subur – Buatan II POM. Buyer PT Inti Indosawit Subur – Buatan I KCP, confirmation date 26 February 2021.</p>	
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<p>3.8.9</p>	<p>Outsourcing Activities</p> <p>i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification.</p> <p>ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</p>	<p>PT. Inti Indosawit Subur – Buatan II POM not outsource its milling activities however operate subcontractor for CPO and PK transporter. The appointed outsourced company is CV Jasa Bersama and PT Buana Jaya Bersama.</p> <p>PT. Inti Indosawit Subur – Buatan II POM having legal ownership of material being transported by appointed outsourced companies: CV Jasa Bersama and PT Buana Jaya Bersama.</p> <p>PT. Inti Indosawit Subur – Buatan II POM have a contract agreement with transporter as below:</p> <ul style="list-style-type: none"> - “Perjanjian Pengangkutan Nomor: 05/VIII/JB-IIS/2019” dated 2 August 2019 between PT Inti Indosawit Subur – Buatan I POM and CV Jasa Bersama. Contract transport for CPO & PK. - “Perjanjian Pengangkutan Nomor: 07/VIII/BJB-IIS/2019” dated 2 August 2019 between PT Inti Indosawit Subur – Buatan I POM and PT Buana Jaya Bersama. Contract transport for CPO & PK. <p>Contract agreement are signed and enforceable by both parties. According to contract agreement article 7 point 1.k stated that “Transporter bersedia memenuhi persyaratan system sertifikasi rantai pasok saat pengangkutan bahan baku dan bersedia untuk diaudit oleh auditor internal perusahaan dan auditor pihak eksternal dari badan sertifikasi yang ditunjuk oleh pihak kedua jika diperlukan” – Transporter are willing to comply with certification system of RSPO Supply Chain during transport material and willing to be audit by internal auditor company (PT IIS – Buatan II POM) and external auditor from Certification Body if necessary. Interview with transporter CV Jasa Bersama and PT Wijaya Manggala Premier Lestari (PT WMPL) conducted on 9 March 2021 during audit onsite, it was noted that they have understand with RSPO Supply Chain requirement during CPO/PK transport and they were pleasure if the CB/Auditor verify their operation while needed.</p>	<p>Complied</p>
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		<p>PT IIS Buatan II POM has a procedure to control the outsourced transporter through "SOP Traceability AA-MPM-OP-1400.17-R7 dated 1 October 2019"</p> <p>Internal control for CPO and PK delivery by contractor has made as well with:</p> <ul style="list-style-type: none"> ✓ Surat Izin Muat CPO dan Kernel, contain information of Driver name, Identity number, Car/Truck Number, CPO/PK Dispatch time, netto, incoming and outgoing time\ ✓ Delivery Order Slip from Transporter, contain information of sales contract number, Truck number, destination, driver name, port destination. ✓ Daftar Periksa Kesiapan Pengiriman CPO/Kernel contain information of Truck number, driver name, date of inspection, item inspection including: driver identity and completeness of vehicle legality, completeness of physical standard of vehicle, number of seal. 													
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	<p>PT Inti Indosawit Subur – Buatan II POM has recorded name and contact detail of all contractors, as follows:</p> <table border="1" data-bbox="1131 1002 1966 1359"> <tr> <td>Name of Transporter</td> <td>CV Jasa Bersama</td> <td>PT Buana Jaya Bersama</td> </tr> <tr> <td>Initial Name</td> <td>JB</td> <td>BJB</td> </tr> <tr> <td>Address</td> <td>Jl. Siak 2 Palas KB 77 KM 15 Pekanbaru</td> <td>Jl. Siak II RT.02 RW. 03 Kec. Payung Sekaki Kel. Bandar Raya - Pekanbaru</td> </tr> <tr> <td>Contact Person</td> <td>Suwito (Director) Djingga</td> <td>Eltono (Director)</td> </tr> </table>	Name of Transporter	CV Jasa Bersama	PT Buana Jaya Bersama	Initial Name	JB	BJB	Address	Jl. Siak 2 Palas KB 77 KM 15 Pekanbaru	Jl. Siak II RT.02 RW. 03 Kec. Payung Sekaki Kel. Bandar Raya - Pekanbaru	Contact Person	Suwito (Director) Djingga	Eltono (Director)	Complied
Name of Transporter	CV Jasa Bersama	PT Buana Jaya Bersama													
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Contact Person	Suwito (Director) Djingga	Eltono (Director)													

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		Telephone	0811279***	08217043***	
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	The site committed to inform CB related name and contact details of any new contractors as mentioned in Procedure "SOP Traceability AA-MPM-OP-1400.17-R7 dated 1 October 2019".			Complied
3.8.12	<p>Record keeping</p> <p>i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.</p> <p>ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.</p> <p>iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p>iv) For Mass Balance Module, the mill:</p> <p>a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</p> <p>b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock).</p>	<p>The organization has maintained accurate, complete, up-to-date and accessible records and reports covering all aspects of RSPO Supply Chain requirements, as evident in:</p> <ul style="list-style-type: none"> - FFB delivery note - Weigbridge ticket for FFB receiving, CPO and PK delivery - Delivery Order - Sales contract - Shipping Announcement - Mass balance report - Internal audit RSPO SCCS and Management review <p>The procedure of Traceability (AA-MPM-OP-1400.7.R7), requires that all records and reports related to traceability and book keeping are retained for a period of 10 years.</p> <p>All receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK are record and balance in a three-monthly basis, as evidence in "Mass Balance Report Buatana II POM" period 2020: January – March, April – June, July – September, October – December and period 2021: January – February.</p> <p>All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios/actual production of CPO and PK.</p>			Complied

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		According to Mass balance Report, Buatan II POM only deliver Mass Balance sales from a positive stock.																						
3.8.13	<p>Extraction Rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate(KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	<p>The organization is able to provided estimate volume of CPO and PK in a year period as in Budget FY2020/2021 Production FFB, CPO and PK. The organization also keep an up to date record of the FFB volume received, CPO and PK produced over a period of twelve (12) month, as in Rekapitulasi Produksi TBS, CPO dan PK PT Inti Indosawit Subur – Buatan II POM.</p> <p>OER and KER are estimated based on associated inputs and upon past experience (previous year FFB, CPO and PK production).</p> <p>The site has set OER for budget 2021 (Jan - Dec) as 19.68% and KER as 5.40%.</p> <p>Budget FFB process 2021: certified 8,730.91 MT, non certified: 33,051.71 MT</p> <p>Budget CPO production 2021: certified 1,798.57 MT, non certified 6,429.66 MT.</p> <p>Budget PK production 2021: certified 471.47 MT, non certified 1,784.79 MT.</p> <p>Previous Budget vs realization on 2020 (Jan – Dec) as below:</p> <table border="1" data-bbox="1131 1050 1980 1396"> <thead> <tr> <th>Description</th> <th>Budget</th> <th>Realization</th> </tr> </thead> <tbody> <tr> <td>FFB Certified</td> <td>53,589.89</td> <td>212,456.61</td> </tr> <tr> <td>FFB Non Certified</td> <td>271,440.74</td> <td>69,761.33</td> </tr> <tr> <td>CPO Certified</td> <td>10,396.44</td> <td>41,410.88</td> </tr> <tr> <td>CPO Non Certified</td> <td>51,571.13</td> <td>13,315.86</td> </tr> <tr> <td>PK Certified</td> <td>2,786.67</td> <td>11,127.23</td> </tr> <tr> <td>PK Non Certified</td> <td>14,114.92</td> <td>3,971.13</td> </tr> </tbody> </table>	Description	Budget	Realization	FFB Certified	53,589.89	212,456.61	FFB Non Certified	271,440.74	69,761.33	CPO Certified	10,396.44	41,410.88	CPO Non Certified	51,571.13	13,315.86	PK Certified	2,786.67	11,127.23	PK Non Certified	14,114.92	3,971.13	Complied
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OER	19.07	19.39							
KER	5.20	5.31							
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	<p>The actual conversion ratio is monitored on daily basis through sounding result and documented in daily report. PT. Inti Indosawit Subur – Buatan II POM is able to demonstrate the work instruction for analysis of oil content.</p> <p>Based on Laporan Harian Produksi dated 31 January 2021, the sounding result and production report shows that actual conversion ratios from FFB into CPO are:</p> <ul style="list-style-type: none"> a. For FFB from Simpang Perak Estate: 19.74% b. For FFB from Buatan II Plasma: 18.82% c. For FFB from third-party: 18.91% <p>And actual conversion ratios from FFB into PK are:</p> <ul style="list-style-type: none"> a. For FFB from Simpang Perak Estate: 5.41% b. For FFB from Buatan II Plasma: 5.41% c. For FFB from third-party: 5.41% <p>Budget vs Actual conversion ratios year 2020 from FFB into CPO are:</p> <ul style="list-style-type: none"> a. For FFB from Simpang Perak Estate: budget 20.22%, actual 20.17% b. For FFB from Buatan II Plasma: budget 18.90%, actual 18.83% c. For FFB from third-party: budget 18.90%, actual 18.91% 	Complied						
3.8.15	Processing For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.	PT Inti Indosawit Subur – Buatan II POM implemented Mass Balance system for the supply chain. This indicator is not applicable.	Not Applicable						

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<p>3.8.16</p>	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p>	<p>PT. Inti Indosawit subur – Buatan II POM has made shipping announcement inside PalmTrace transaction, sample seen for period August 2019 – February 2021:</p> <table border="1"> <thead> <tr> <th>Transaction ID</th> <th>Buyer</th> <th>Product</th> <th>Supply Chain Model</th> <th>Volume</th> <th>Status</th> </tr> </thead> <tbody> <tr> <td>TR-a2d8461c-3e99</td> <td>Buatan I KCP</td> <td>CSPK</td> <td>MB</td> <td>827.63</td> <td>Confirmed</td> </tr> <tr> <td>TR-4144aa3a-e466</td> <td>Buatan I KCP</td> <td>CSPK</td> <td>MB</td> <td>839.31</td> <td>Confirmed</td> </tr> <tr> <td>TR-a4b93c5c-d3d7</td> <td>Buatan I KCP</td> <td>CSPK</td> <td>MB</td> <td>940.54</td> <td>Confirmed</td> </tr> <tr> <td>TR-1c91aa34-5090</td> <td>PT. SDS</td> <td>CSPO</td> <td>MB</td> <td>42.23</td> <td>Confirmed</td> </tr> <tr> <td>TR-e61f6187-1c7b</td> <td>PT. SDS</td> <td>CSPO</td> <td>MB</td> <td>304.22</td> <td>Confirmed</td> </tr> <tr> <td>TR-78a268df-9cb5</td> <td>PT. SDS</td> <td>CSPO</td> <td>MB</td> <td>1064.97</td> <td>Confirmed</td> </tr> <tr> <td>TR-5693a160-9b72</td> <td>PT. SDS</td> <td>CSPO</td> <td>MB</td> <td>1184.21</td> <td>Confirmed</td> </tr> <tr> <td>TR-fd9887a8-2457</td> <td>PT. SDS</td> <td>CSPK</td> <td>MB</td> <td>625.01</td> <td>Confirmed</td> </tr> <tr> <td>TR-661fe86a-e89a</td> <td>Buatan I KCP</td> <td>CSPK</td> <td>MB</td> <td>1069.57</td> <td>Confirmed</td> </tr> <tr> <td>TR-12912243-f813</td> <td>PT. SDS</td> <td>CSPO</td> <td>MB</td> <td>628.22</td> <td>Confirmed</td> </tr> <tr> <td>TR-092fe7c5-648c</td> <td>Buatan I KCP</td> <td>CSPK</td> <td>MB</td> <td>1526.43</td> <td>Confirmed</td> </tr> <tr> <td>TR-f3b6de19-360c</td> <td>Buatan I KCP</td> <td>CSPK</td> <td>MB</td> <td>917.92</td> <td>Confirmed</td> </tr> <tr> <td>TR-f0b4300c-244d</td> <td>Buatan I KCP</td> <td>CSPK</td> <td>MB</td> <td>962.92</td> <td>Confirmed</td> </tr> <tr> <td>TR-a8f12132-bb0d</td> <td>Buatan I KCP</td> <td>CSPK</td> <td>MB</td> <td>999.32</td> <td>Confirmed</td> </tr> </tbody> </table>	Transaction ID	Buyer	Product	Supply Chain Model	Volume	Status	TR-a2d8461c-3e99	Buatan I KCP	CSPK	MB	827.63	Confirmed	TR-4144aa3a-e466	Buatan I KCP	CSPK	MB	839.31	Confirmed	TR-a4b93c5c-d3d7	Buatan I KCP	CSPK	MB	940.54	Confirmed	TR-1c91aa34-5090	PT. SDS	CSPO	MB	42.23	Confirmed	TR-e61f6187-1c7b	PT. SDS	CSPO	MB	304.22	Confirmed	TR-78a268df-9cb5	PT. SDS	CSPO	MB	1064.97	Confirmed	TR-5693a160-9b72	PT. SDS	CSPO	MB	1184.21	Confirmed	TR-fd9887a8-2457	PT. SDS	CSPK	MB	625.01	Confirmed	TR-661fe86a-e89a	Buatan I KCP	CSPK	MB	1069.57	Confirmed	TR-12912243-f813	PT. SDS	CSPO	MB	628.22	Confirmed	TR-092fe7c5-648c	Buatan I KCP	CSPK	MB	1526.43	Confirmed	TR-f3b6de19-360c	Buatan I KCP	CSPK	MB	917.92	Confirmed	TR-f0b4300c-244d	Buatan I KCP	CSPK	MB	962.92	Confirmed	TR-a8f12132-bb0d	Buatan I KCP	CSPK	MB	999.32	Confirmed	<p>Complied</p>
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		TR-a1fb60c0-4f3b	Buatan KCP	CSPK	MB	787.72	Confirmed
		TR-33ff4e45-f66e	Buatan KCP	CSPK	MB	747.95	Confirmed
		TR-d48c1a44-1dcc	Buatan KCP	CSPK	MB	822.57	Confirmed
		TR-6ebc2ed9-cc99	PT SDS	CSPK	MB	695.79	Confirmed
		TR-bec9194f-5d00	PT SDS	CSPO	MB	17.5	Confirmed
		TR-dabade3a-0657	Buatan KCP	CSPK	MB	668.51	Confirmed
		TR-830170e2-1382	PT SDS	CSPK	MB	200	Confirmed
		TR-1119b7bf-b2e9	Buatan KCP	CSPK	MB	787.45	Confirmed
		TR-b776af73-2562	Buatan KCP	CSPK	MB	691.34	Confirmed
		TR-64fb46e1-9238	Buatan KCP	CSPK	MB	821.64	Confirmed
		TR-f89ae184-2ab8	Buatan KCP	CSPK	MB	275.09	Confirmed
		TR-1ff5062b-e9df	Buatan KCP	CSPK	MB	1056.31	Confirmed
		TR-4b78f619-0ddc	Buatan KCP	CSPK	MB	847.77	Confirmed
		TR-08750726-3834	Buatan KCP	CSPK	MB	956.06	Confirmed
		TR-ba02b77b-79a2	Buatan KCP	CSPK	MB	1125.4	Confirmed
<p>PT. Inti Indosawit Subur – Buatan II POM made remove RSPO certified CSPO from their PalmTrace account:</p>							

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		<ul style="list-style-type: none"> - Transaction ID: ST-TR-873ee1b1-726c for removed 39,344.82 MT CSPO from certified stock, dated 20/07/2020; Stock removed for CSPO sold as ISCC certified. - Transaction ID: ST-TR-626e2e1f-9160 for removed 19,042.67 MT CSPO from certified stock, dated 04/03/2020; Stock removed for CSPO sold as ISCC certified. - Transaction ID: ST-TR-873ee1b1-726c for removed 39,344.82 MT CSPO from certified stock, dated 20/07/2020; Stock removed for CSPO sold as ISCC certified. 	
3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	<p>PT. Inti Indosawit Subur – Buatan II POM has not made claims regarding the support of RSPO certified oil palm products. However the organization aware about the RSPO Rules on Market Communications and Claims.</p>	Complied
General corporate communications			
4.1	<p>A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.</p>	<p>PT. Inti Indosawit Subur (with the brand Asian Agri), the parent company of Buatan 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.</p>	Complied
4.2	<p>In corporate communications a member is allowed to:</p> <ul style="list-style-type: none"> • Display its RSPO membership status • Display the RSPO web address (www.rsपो.org) • State that the member supports the work of the RSPO • State the member’s history with regard to the RSPO. • Use the RSPO trademark to promote its membership of the RSPO. <p>Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at www.rsपो.org' where the link must lead to the member’s profile page.</p>	<p>PT. Inti Indosawit Subur (with the brand Asian Agri), in its website:</p> <p>a. Display its RSPO membership status: No, PT. Inti Indosawit Subur (with the brand Asian Agri), did not display its RSPO membership status. The CH only stated "In 2006, became a member of the Roundtable of Sustainable Palm Oil. We received our first RSPO certification for our estate in 2010."</p> <p>b. Display the RSPO web address: Not in direct manner. PT. Inti Indosawit Subur (with the brand Asian Agri), made a link to RSPO website.</p> <p>c. State the member supports the work of the RSPO: Not in direct manner. In the website, PT. Inti Indosawit Subur (with the brand Asian</p>	Complied

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		<p>Agri), "In 2006, became a member of the Roundtable of Sustainable Palm Oil. We received our first RSPO certification for our estate in 2010."</p> <p>d.State the member's history with regards to the RSPO: Not in direct manner. In the website, PT. Inti Indosawit Subur (with the brand Asian Agri), "In 2006, became a member of the Roundtable of Sustainable Palm Oil. We received our first RSPO certification for our estate in 2010, and in 2012, the certification for our smallholder scheme."</p> <p>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 as website.</p>	
4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	<p>No, PT. Inti Indosawit Subur (with the brand Asian Agri), did not display its RSPO membership status.</p> <p>It is clear that the statement did not lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.</p>	Complied
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member's own products.	<p>No, PT. Inti Indosawit Subur (with the brand Asian Agri), did not display its RSPO membership status.</p> <p>It is clear that the statements are clear and did not mislead consumers or other stakeholders as to the certified content of oil palm products in the PT. Inti Indosawit Subur – Buatan II POM own products.</p>	Complied
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	No, PT. Inti Indosawit Subur (with the brand Asian Agri) did not display its RSPO Corporate Logo in any document.	Complied
Business to business communications			

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5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	There was no use of RSPO trademark and/or RSPO corporate logo in business to business communication related to RSPO certified product; between PT. Inti Indosawit Subur – Buatan II POM and their buyers.	Complied
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	When confirming the sale of certified oil palm products, PT. Inti Indosawit Subur – Buatan II POM followed the requirements of the RSPO SCCS. PT. Inti Indosawit Subur – Buatan II POM stating the supply chain model and certificate number under which the claim is being made.	Complied
5.3	<p>Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options:</p> <p>a) If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer’s SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.</p> <p>b) If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p>	<p>PT. Inti Indosawit Subur – Buatan II POM is not a distributor and/or wholesaler.</p> <p>Not applicable.</p>	Not Applicable
5.4	<p>A certified member can provide information to its customers detailing the presence of certified palm oil contained within a product even if it is not eligible for a product-specific under RSPO rules. The end product must not be labelled as certified or sold in such a way that implies RSPO certification.</p> <p>For example, a retailer or food service company may require a breakdown of all palm based ingredients within an end product and the certified status of each. This information may be provided by a certified RSPO member without constituting a product-specific claim.</p>	<p>PT. Inti Indosawit Subur – Buatan 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	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 product(s), which are known as 'product-specific' claims. Product-specific claims are voluntary.	PT. Inti Indosawit Subur – Buatan II POM is not using product-specific claims in its CSPKO product. PT. Inti Indosawit Subur – Tungkal Ulu POM is producing and selling CSPO and CSPK; and not making a business to consumer communication. Not applicable.	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 – Buatan II POM is not using RSPO trademark and/or RSPO label. PT. Inti Indosawit Subur – Buatan I 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 – Buatan II POM is not using RSPO-certified on-pack claim. PT. Inti Indosawit Subur – Buatan I 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 – Buatan II POM is not making any claim related to their RSPO membership status. PT. Inti Indosawit Subur – Buatan I 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 – Buatan II POM is not making any information about their supplier's RSPO membership status. PT. Inti Indosawit Subur – Buatan II POM is producing and selling CSPO and CSPK; and not making a business to consumer communication. Not applicable.	Not Applicable

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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 – Buatan 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 – Buatan 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 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 .	PT. Inti Indosawit Subur – Buatan II POM is retailers or food service company. Not applicable.	Not Applicable
MODULE B – MASS BALANCE SPECIFIC RULES			
Minimum Mass Balance content			
	95% or above of the oil palm content must be RSPO MB-certified.	PT Inti Indosawit Subur – Buatan II POM was sold the RSPO MB for CSPO and CSPK. The product is 100% RSPO certified MB.	Complied

	<p>Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.</p>	<p>PT Inti Indosawit Subur – Buatan II POM was sold the RSPO MB for CSPO and CSPK. The product is 100% RSPO certified MB. There is no any percentage of non-certified oil palm within the product.</p>	<p>Complied</p>
<p>Labelling and trademark (MB)</p>			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> • Surrounded by the text: 'Certified sustainable palm oil'. • The RSPO label MUST contain the tag 'MIXED'. The tag MIXED designates oil palm products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag 'MIXED' on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim. • The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'. • Wherever the RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4 pt (1.4 mm or 0.06 inch). • In on-pack communications, the RSPO trademark can be printed anywhere on the pack. Further guidance on use of the trademark is provided in the RSPO Trademark License Terms and Conditions and in Annex 1 of the Rules on Market Communications & Claims document. 	<p>PT Inti Indosawit Subur – Buatan II POM was sold the RSPO MB for CSPO and CSPK. No label and RSPO trademark was used by company.</p>	<p>Complied</p>
<p>Messaging (MB)</p>			
	<p>Messaging ALLOWED in storytelling in product-related communications includes:</p>	<p>PT Inti Indosawit Subur – Buatan II POM was not apply storytelling in product.</p>	<p>Complied</p>

	<ul style="list-style-type: none"> • [Oil palm products]/[palm oil]/[palm kernel oil] from RSPO-certified mills and plantations were mixed with non-certified oil palm products in the supply chain. • The volume of [oil palm products][palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations. <p>In off-product communications, reference to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown in company records is allowed.</p> <p>Messaging NOT ALLOWED in storytelling in product-related communications:</p> <ul style="list-style-type: none"> • Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product. 		
<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>			
4.1.1	<p>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, supply chain and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p>	<p>The company has had a corporate policy set on 14 July 2020 by Group Manager (GM) PT Inti Indosawit Subur – Group Buatan according to the Memorandum from GM No. 01/GM-Buatan/MEMO/VII/2020 dated 14 July 2020, related "<i>The policy prohibits any acts of revenge, intimidation and harassment for whistleblowers / human rights defenders</i>" (Human Right Defender).</p> <p>The policy relating to human rights, is explained in point 13, stating that: "<i>The company respects human rights by treating all employees fairly, both in terms of acceptance, valuation, conditions and working environment, as well as representation regardless of tribe, caste, national origin, religion/belief, disability, gender, sexual orientation, membership of trade union political affiliation and/or age</i>".</p>	Complied

		<p>Corporate policy has been socialized/dissemination to all levels of PT IIS – Buatan Group employees on 13 January 2020 and 16 July 2020 (list of participants can be shown) and on stakeholders (including local contractors) on 3 January 2020 which was attended by 23 stakeholders.</p> <p>Scheme Smallholder: Plasma Buatan II Plantation in each KUD or Cooperative has had organisation policy, for example: In Bhirawa Bhakti Cooperative, the Cooperative Policy was established on 14 February 2020 and Kebun Sawit Harapan Cooperative Policy was established on 16 February 2020, in which it contains the following:</p> <ol style="list-style-type: none"> 1) Compliance with regulation and law 2) Ethical behavior in business (prohibition of all forms of corruption, bribery, fraud in the use of funds and resources) 3) Environmental pollution 4) Occupational Health and Safety 5) Prohibition of the practice of burning land, peat areas and forest areas 6) Respect defenders without giving threats or intimidation 7) Respect human rights defenders without making threats or intimidation Prevents sexual harassment 8) Respect human rights by treating employees and peasants fairly and does not differentiate between ethnicity, caste, religion, and gender. 9) Prohibition of employing children under the age of 18 in every plantation operational activity. <p>This policy has been socialized by the KUD/Cooperative each to all members, partners and surrounding communities, i.e In Mulus Rahayu Cooperative on 16 February 2020 which was attended by 20 participants. At the Kebun Sawit Harapan Cooperative on 14 February 2020 which was attended by 21 participants.</p>	
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		<p>The policy is also written in their farmer handbook "Buku Panduan Petani". The implementation of said policy in form of dissemination of anti-corruption policy, transparency in expenditure for road maintenance, fair calculation of worker payment, good quality FFB.</p> <p>Scheme Smallholder: Plasma Buatan II Plantation in each KUD or Cooperative has had organisation policy, for example: In Mulus Rahayu Cooperative, the Cooperative Policy was established on 14 February 2020 and at Bhirawa Bhakti Cooperative Policy was established on 16 February 2020, Kebun Sawit Harapan Cooperative and Buatan Jaya Cooperative</p> <p>The policy is contains the following:</p> <ul style="list-style-type: none"> - Compliance with regulation and law - Ethical behavior in business (prohibition of all forms of corruption, bribery, fraud in the use of funds and resources) - Environmental pollution - Occupational Health and Safety - Prohibition of the practice of burning land, peat areas and forest areas - Respect defenders without giving threats or intimidation - Respect human rights by treating employees and peasants fairly and does not differentiate between ethnicity, caste, religion, and gender. - Prevents sexual harassment - Prohibition of employing children under the age of 18 in every plantation operational activity. <p>This policy has been socialized by the KUD/Cooperative each to all members, partners and surrounding communities, i.e In Mulus Rahayu Cooperative on 16 February 2020 which was attended by 20 participants. At the Kebun Sawit Harapan Cooperative on 14 February</p>	
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		<p>2020 which was attended by 21 participants.</p> <p>The policy is also written in their farmer handbook "<i>Buku Panduan Petani</i>". The implementation of said policy in form of dissemination of anti-corruption policy, transparency in expenditure for road maintenance, fair calculation of worker payment, good quality FFB.</p>	
4.1.2	<p>The unit of certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations.</p>	<p>Based on the interview with stakeholder and documents review with the head of the Head of Bukit Agung Village, Chief of Gender committee that PT IIS - Buatan II Group, there is no any use of employees from mercenaries and paramilitaries use in the operations.</p> <p>Up to this RAV audit, there is no issue or case related to the acts of violence against the employees of the company.</p>	Complied
<p>Criteria 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.</p>			
4.2.1	<p>(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p>	<p>Buatan Estate and Mill</p> <p>Company has established a mechanism to handle complaint from external party, as written in "Mekanisme Penanganan Keluhan" – complaint handling mechanism (Doc. No. SOP AA-GL-5005-RO-01) while complaint from internal regulated under "<i>Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan</i>" – Employee' complaint and resolution mechanism (Doc. No. SOP-AA-HR-3008-RO 05) and responded not more than 14 days. These mechanisms have communicated to external parties and disseminated to PT IIS employees. Based on interview with local communities, Gender committee leader and worker union leader; they understood the procedure and mechanism to communicating complaint and/or grievance to company. Corporate policy has been socialized/dissemination to all levels of PT IIS – Buatan Group employees on 7-8 July 2020 (list of</p>	Complied

		<p>participants can be shown) and on stakeholders (including local contractors) on 9-10 July 2020 which was attended by 25 stakeholders.</p> <p>Scheme smallholders:</p> <p>The scheme smallholders have a mechanism of consultation and communication in "Mekanisme Komunikasi, Konsultasi dan Keluhan", dated 3rd January 2011. The procedure has been communicated to all members on 10 January 2017 and also recorded into the "Buku Pintar" for each of farmer</p>	
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.	According to interview with management representatives and sustainability staff during the audit, there is no illiterate parties in estate, mill or scheme smallholders.	Complied
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.	<p>Buatan Estate and Mill</p> <p>Company has established a mechanism to handle complaint from external party, as written in "Mekanisme Penanganan Keluhan" – complaint handling mechanism (Doc. No. SOP AA-GL-5005-RO-01 dated 22 August 2011) while complaint from internal regulated under "Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan" – Employee' complaint and resolution mechanism (Doc. No. SOP-AA-HR-3008-RO 05) and responded not more than 14 days. These mechanisms have communicated to external parties and disseminated to PT IIS employees.</p> <p>Certificate holder has had new procedure namely <i>SOP Penyampaian dan Penyelesaian Keluhan Karyawan</i> (SOP No: AA-HR-308.5-R1 effective dated 1 December 2019). This procedure also protected whistle blower</p>	Complied

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		<p>anonymity. Referring to Asian Agri’s website https://www.asianagri.com/id/panel-keberlanjutan/keluhan-pengaduan.</p> <p><i>Asian Agri is committed to responding quickly and constructively to any grievance raised against any of our own operations or our suppliers, and to report them publicly. We develop a robust grievance procedure to resolve all verifiable complaints and conflicts with all related stakeholders such as land conflicts, social conflicts, human right issues, labor issues, etc.</i></p> <table border="1" data-bbox="1160 718 1948 1351"> <thead> <tr> <th data-bbox="1160 718 1608 769">Internal Reporting:</th> <th data-bbox="1608 718 1948 769">Channel/Remarks</th> </tr> </thead> <tbody> <tr> <td data-bbox="1160 769 1608 1220"> <p><i>There are log books located in all estates and mills managed by Asian Agri’s business units. Employees are free to file concerns and reports in these log books, on matters related to Asian Agri’s sustainability policy. Concerns on operation disruptions faced by employees may be documented in the Disruption Log Book. Issues pertaining to employee rights may be documented in the Complaint Log Book.</i></p> </td> <td data-bbox="1608 769 1948 1220"> <p><i>Log Books:</i></p> <ul style="list-style-type: none"> • <i>Disruption</i> • <i>Complaint</i> </td> </tr> <tr> <td data-bbox="1160 1220 1608 1351"> <p><i>Confidential reports may be submitted through email or telephone to protect the identity of the reporter.</i></p> </td> <td data-bbox="1608 1220 1948 1351"> <p><i>Poster on Whistleblowing is placed in every office of Asian Agri.</i></p> </td> </tr> </tbody> </table>	Internal Reporting:	Channel/Remarks	<p><i>There are log books located in all estates and mills managed by Asian Agri’s business units. Employees are free to file concerns and reports in these log books, on matters related to Asian Agri’s sustainability policy. Concerns on operation disruptions faced by employees may be documented in the Disruption Log Book. Issues pertaining to employee rights may be documented in the Complaint Log Book.</i></p>	<p><i>Log Books:</i></p> <ul style="list-style-type: none"> • <i>Disruption</i> • <i>Complaint</i> 	<p><i>Confidential reports may be submitted through email or telephone to protect the identity of the reporter.</i></p>	<p><i>Poster on Whistleblowing is placed in every office of Asian Agri.</i></p>	
Internal Reporting:	Channel/Remarks								
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			<ul style="list-style-type: none"> • Telephone: +62 811 910 7916 • Email: attention@asia.nagri.com 	
		<p><i>External Reporting:</i></p> <p><i>Stakeholders of Asian Agri including but not limited to Government, smallholders, suppliers, vendors, academicians, NGOs, media, etc), are provided different channels to report their concerns/findings.</i></p> <p><i>Reporters may share their concerns and information on business misconduct, corruption, harassment, criminal acts, environment, etc.</i></p> <p><i>All reports will be treated confidentially and if deemed appropriate, updates will be made publicly available as per our Grievance mechanism.</i></p>	<p><i>Channel/Remarks</i></p> <ul style="list-style-type: none"> • Email: grievance@asianagri.com • Address: Jl. MH Thamrin No. 31 Jakarta 10230 Indonesia • Fax: +62 21 230 1120 Attn.: Grievance Secretariat <p><i>Grievance submissions should be made using the Grievance Submission Form.</i></p>	

		<p>This procedure is also applied to scheme smallholder operational. The procedure provides guidelines on handling grievances related to sustainability practices across our supply chain as well governance matters in our operations. The following grievance channels are available to support business transparency:</p> <p>The last socialization of SOP namely <i>SOP Penyampaian dan Penyelesaian Keluhan Karyawan</i> (SOP No: AA-HR-308.5-R1 effective dated 1 December 2019) was performed on 7-9 January 2020 and attended by 126 participants.</p> <p>Scheme smallholders: The scheme smallholders have a mechanism of consultation and communication in "Mekanisme Komunikasi, Konsultasi dan Keluhan", dated 3rd January 2011. The procedure has been communicated to all members on November 2019 and also recorded into the "Buku Pintar" for each of farmer.</p>	
4.2.4	<p>The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.</p>	<p>Based on cases study and interview with sustainability staff, there is no new land expansion since certificate issued. There is no land conflict between PT. Inti Indosawit Subur – Buatan Mill/Estate with other party including with surrounding village.</p> <p>Based on interviews with villages around the plantation, Bukit Agung Village (Bpk. Parlaungan Panjaitan) and also interview with Plantation office and Environment Office of Pelalawan Regency on March 5, 2021, claimed that there were no complaints/disputes from the community around the plantation.</p>	Complied

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

4.3.1	Contributions to community development that are based on the results of consultation with local community are demonstrated.	PT IIS-Buatan Group has established a CSR program for the period 2020-2021, the determination of this CSR program is determined based on consultation/deliberation with the surrounding village community (village head) through the Deliberation of Plans and Development (Musrenbang Desa) in the period 2020-2021. MUSRENBANG – <i>Musyawah Perencanaan Pembangunan</i> for the period of 2021 has been conducted in January 2021 (for village planning period in 2021) at the surrounding villages. Musrenbang is a discussion forum between villagers conducted to discuss the problems and potential of the village to be well identified to provide a clear direction for appropriate actions according to the scale of priorities and implemented in addressing the problem or maximizing the potential that has as the basis of the village government's work program to carry out budgeting and annual activities of the village.	Complied
Criteria 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.			
4.4.1	(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed (FPIC) process. Documents related to the history of land tenure and the actual legal or customary use of the land are available.	<p>Simpang Perak Estate:</p> <p>PT. Inti Indosawit Subur – Simpang Perak Estate has prepared a mechanism to identify and calculate fair compensation or loss of legal or customary rights to land set out in the standard operating procedure (SOP) "Prosedur Penyelesaian Sengketa Lahan No. AA-GL-5003-1-R2", dated 8th May 2015. The mechanism has taken into account FPIC Guide for RSPO Member 2015, whereby the procedure regulated information convey, negotiation, participative boundary measurement, involvement of other party and neighboring parties – in the boundary of the conflicted area (if any).</p> <p>Scheme Smallholders:</p> <p>Based on interview, KUD Mulus Rahayu, KUD Bhirawa Bhakti, KUD Kebun Sawit Harapan and KUD Buatana Jaya sampled smallholder</p>	Complied

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

	4.4.2c Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities. Including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land.	Simpang Perak Estate and Scheme Smallholders: Based on documents review and interview with local government and local communities surrounding the company, it was noted that no customary land or other legal rights within the company areas and in smallholder plantation. In addition, there is no land dispute between the company and communities surrounding their operational areas.	
4.4.3	(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).	Simpang Perak Estate and Scheme Smallholders: The company and scheme smallholders have "Hak Guna Usaha (HGU)"/"Sertifikat Hak Milik (SHM)" Land title for smallholders. There is no customary land or legal rights within the company and scheme smallholdres area as the land originally was allocated as part of transmigration program. Based on documents review and interview with local government and local communities in surrounding of the company, it was noted there was no area/land that is under dispute.	Complied
4.4.4	All relevant information is available in appropriate forms and languages, including assessment of impact, proposed benefit sharing, and legal arrangements.	Simpang Perak Estate and Scheme Smallholders: Based on documents review and interview with local government and local communities surrounding the company, it was noted that no customary land or other legal rights within the company areas and in smallholder plantation.	Complied
4.4.5	(C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.	Simpang Perak Estate and Scheme Smallholders: Based on stakeholder consultation with communities surrounding the plantation, there has never been social unrest related to presence of occupied land.	Complied

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4.4.6	There is evidence that implementation of agreement negotiated through FPIC is annually reviewed in consultation with affected parties.	Simpang Perak Estate and Scheme Smallholders: Based on documents review and interview with local government and local communities surrounding the company, it was noted that no customary land or other legal rights within the company areas and in smallholder plantation.	Complied
Criteria 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.			
4.5.1	(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.	Estate and Smalholder: Note that there was no new planting in Simpang Perak Estate. All of the immature area was for replanting, for oil palm with planting year 1988, 1989, 1990, 1991.	Not Applicable
4.5.2	(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions. All the relevant information and documents are made available, and community have option of resourced access to independent third-party advice through a documented, long-term and two- way process of consultation and negotiation.	Estate and Smalholder: Note that there was no new planting in Simpang Perak Estate. All of the immature area was for replanting, for oil palm with planting year 1988, 1989, 1990, 1991.	Not Applicable
4.5.3	Evidence is available that affected local peoples understand they have the right to say 'agree' or 'not agree' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.	Estate and Smalholder: Note that there was no new planting in Simpang Perak Estate. All of the immature area was for replanting, for oil palm with planting year 1988, 1989, 1990, 1991.	Not Applicable

4.5.4	To ensure local food and water security and as part of the FPIC process, SEIA participation and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of land allocations process.	Estate and Smalholder: Note that there was no new planting in Simpang Perak Estate. All of the immature area was for replanting, for oil palm with planting year 1988, 1989, 1990, 1991.	Not Applicable
4.5.5	Evidence is available that the affected communities and rights holders have had the option to access information and advice, that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.	Estate and Smalholder: Note that there was no new planting in Simpang Perak Estate. All of the immature area was for replanting, for oil palm with planting year 1988, 1989, 1990, 1991.	Not Applicable
4.5.6	Evidence is available that the communities or their representatives gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.	Estate and Smalholder: Note that there was no new planting in Simpang Perak Estate. All of the immature area was for replanting, for oil palm with planting year 1988, 1989, 1990, 1991.	Not Applicable
4.5.7	After 15 November 2018, new lands will not be acquired for plantations and mills as a result of recent (after November 2005) expropriations in the national interest (eminent domain) without FPIC process, except in cases of smallholders benefitting from agrarian reform or anti-drug programmes.	Estate and Smalholder: Note that there was no new planting in Simpang Perak Estate. All of the immature area was for replanting, for oil palm with planting year 1988, 1989, 1990, 1991.	Not Applicable
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation.	Estate and Smalholder: Note that there was no new planting in Simpang Perak Estate. All of the immature area was for replanting, for oil palm with planting year 1988, 1989, 1990, 1991.	Not Applicable

Criteria 4.6: Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.

<p>4.6.1</p>	<p>(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.</p>	<p>Simpang Perak Estate:</p> <p>PT. Inti Indosawit Subur – Buatan has prepared a mechanism to identify and calculate fair compensation or loss of legal or customary rights to land set out in the standard operating procedure (SOP) “Prosedur Penyelesaian Sengketa Lahan No.AA-GL-5003-1-R2”, dated 8th May 2015. The mechanism has taken into account FPIC Guide for RSPO Member 2015, whereby the procedure regulated information convey, negotiation, participative boundary measurement, involvement of other party and neighboring parties – in the boundary of the conflicted area (if any).</p> <p>Scheme Smallholders:</p> <p>Cooperatives have a conflicts resolution mechanism in “Mekanisme Penanganan Konflik” dated 1st August 2014. The mechanism explaining flow process to resolution on land conflict, with involvement of company, village government and all related agencies.</p> <p>Based on interview, Mulus Rahayu Cooperative, Kebun Sawit Harapan Cooperative and Bhirawa Bhkati Cooperative, sampled smallholder member and relevant authority, Dinas Perkebunan Kabupaten Pelalawan (plantation agency); there was no case of land conflict between smallholder member and/or conflict with other party related to land status or boundary.</p>	<p>Complied</p>
<p>4.6.2</p>	<p>(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p>	<p>Simpang Perak Estate:</p> <p>PT. Inti Indosawit Subur – Buatan II has prepared a mechanism to identify and calculate fair compensation or loss of legal or customary rights to land set out in the standard operating procedure (SOP) “Prosedur Penyelesaian Sengketa Lahan No.AA-GL-5003-1-R2”, dated</p>	<p>Complied</p>

		<p>8th May 2015. The mechanism has taken into account FPIC Guide for RSPO Member 2015, whereby the procedure regulated information convey, negotiation, participative boundary measurement, involvement of other party and neighboring parties – in the boundary of the conflicted area (if any).</p> <p>Scheme Smallholders:</p> <p>Based on interview, Mulus Rahayu Cooperative, Kebun Sawit Harapan Cooperative and Bhirawa Bhkati Cooperative, sampled smallholder member and relevant authority, Dinas Perkebunan Kabupaten Pelalawan (plantation agency); there was no case of land conflict between smallholder member and/or conflict with other party related to land status or boundary.</p> <p>Cooperatives have a conflicts resolution mechanism in “Mekanisme Penanganan Konflik” dated 1st August 2014. The mechanism explaining flow process to resolution on land conflict, with involvement of company, village government and all related agencies.</p> <p>There is no new planting within certified area of PT Inti Indosawit Subur – Simpang Perak Estate and Buatan II Plasma after November 2005. Currently, replanting activities are still in progress. All of the immature area was for replanting, for oil palm with planting year 1988, 1989, 1990 and 1991.</p>	
4.6.3	Evidence is available that equal opportunities are provided to both men and women to hold land titles for smallholdings (if possible based on local law, customs and/or agreement).	Based on documents review and interview with local government and local communities surrounding the company, it was noted that no customary land or other legal rights within the company areas and in smallholder plantation.	Complied

4.6.4	The process and outcomes of any negotiated agreements, compensation and payments are documented with evidence of the participation of affected parties and made available to them.	<p>Simpang Perak Estate:</p> <p>Based on stakeholder consultation, there is no expansion plan in business plan. There is no land conflict between PT. Inti Indosawit Subur – Buatan with other party including with surrounding village.</p> <p>Scheme smallholder:</p> <p>The Scheme Smallholder area of PT. Inti Indosawit Subur – Buatan was included in government program for “Perkebunan Inti Rakyat – Transmigrasi/PIR-Trans” as per “Keputusan menteri Transmigrasi No.Kep.90/MEN/1990 tentang Izin Pelaksanaan Transmigrasi PIR-Trans kepada PT. Inti Indosawit Subur I dengan Komoditas Kelapa Sawit di Lokasi Pangkalan Kuras, Kabupaten Kampar dan Pasir Penyau, Kabupaten Indragiri Hulu, Provinsi Riau” dated 29th July 1991.</p> <p>From this background, it was understood the scheme smallholder obtained the land ownership through government program PIR-Trans. Therefore it was not gone through compensation process to previous traditional landowners because the land was state land, free from ownership right. Currently, all scheme smallholder members have been granted with “Sertifikat Hak Milik/SHM” (land title) from “Badan Pertanahan Nasional /BPN”.</p>	Complied
<p>Criteria 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.</p>			
4.7.1	(C) A mutually agreed procedure for identifying people entitled to compensation is in place.	<p>Simpang Perak Estate:</p> <p>PT. Inti Indosawit Subur – Buatan II has prepared a mechanism to identify and calculate fair compensation or loss of legal or customary rights to land set out in the standard operating procedure (SOP) “Prosedur Penyelesaian Sengketa Lahan No.AA-GL-5003-1-R2”, dated 8th May 2015. The mechanism has taken into account FPIC Guide for</p>	Complied

		<p>RSPO Member 2015, whereby the procedure regulated information convey, negotiation, participative boundary measurement, involvement of other party and neighboring parties – in the boundary of the conflicted area (if any).</p> <p>Scheme Smallholders:</p> <p>Based on interview, Mulus Rahayu Cooperative, Kebun Sawit Harapan Cooperative and Bhirawa Bhkati Cooperative, sampled smallholder member and relevant authority, Dinas Perkebunan Kabupaten Pelalawan (plantation agency); there was no case of land conflict between smallholder member and/or conflict with other party related to land status or boundary.</p> <p>Cooperatives have a conflicts resolution mechanism in “Mekanisme Penanganan Konflik” dated 1st August 2014. The mechanism explaining flow process to resolution on land conflict, with involvement of company, village government and all related agencies.</p> <p>There is no new planting within certified area of PT Inti Indosawit Subur – Buatan Estate and Buatan Plasma after November 2005. Currently, replanting activities are still in progress. All of the immature area was for replanting, for oil palm with planting year 1988, 1989, 1990 and 1991.</p>	
4.7.2	<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>Simpang Perak Estate:</p> <p>PT. Inti Indosawit Subur – Buatan has prepared a mechanism to identify and calculate fair compensation or loss of legal or customary rights to land set out in the standard operating procedure (SOP) “Prosedur Penyelesaian Sengketa Lahan No.AA-GL-5003-1-R2”, dated 8th May 2015. The mechanism has taken into account FPIC Guide for RSPO</p>	Complied

		<p>Member 2015, whereby the procedure regulated information convey, negotiation, participative boundary measurement, involvement of other party and neighboring parties – in the boundary of the conflicted area (if any).</p> <p>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.</p> <p>Based on mechanism, public relation officer will receive information of any complaint, grievance and land dispute/claims and records under the logbook.</p> <p>PT IIS-Buatan II POM & Estate have not acquiring any additional land and not involved in any land compensation payments. Therefore the mechanism only applicable to resolve land dispute within company's HGU. Land ownership from previous landowner becomes important document in order to continue negotiation process against land claim. Land claim without supporting evidence of land ownership, will be treated with approach and legal manner.</p> <p>There is no negotiation/compensation payment currently for both estate and scheme smallholders. The land has settled now, no any complaint was received in the last few years. In Scheme smallholder's area, it was settled since the "PIR Project" started due to this project from Central Government, where the land status is "Clean and Clear".</p> <p>Based on the results of interviews with the Environment Agency (Dinas Lingkungan Hidup) and Plantation Agency (Dinas Perkebunan) of Pelalawan Regency, there is no land dispute between PT IIS – Buatan and the ownership of the surrounding community.</p>	
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		<p>Scheme Smallholders:</p> <p>Based on interview, Mulus Rahayu Cooperative, Kebun Sawit Harapan Cooperative and Bhirawa Bhkati Cooperative, sampled smallholder member and relevant authority, Dinas Perkebunan Kabupaten Pelalawan (plantation agency); there was no case of land conflict between smallholder member and/or conflict with other party related to land status or boundary.</p> <p>Cooperatives have a conflicts resolution mechanism in “Mekanisme Penanganan Konflik” dated 1st August 2014. The mechanism explaining flow process to resolution on land conflict, with involvement of company, village government and all related agencies.</p> <p>There is no new planting within certified area of PT Inti Indosawit Subur – Simpang Perak Estate and Buatan II Plasma after November 2005. Currently, replanting activities are still in progress. All of the immature area was for replanting, for oil palm with planting year 1988, 1989, 1990 and 1991.</p>	
4.7.3	Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.	<p>Simpang Perak Estate:</p> <p>PT. Inti Indosawit Subur – Buatan has prepared a mechanism to identify and calculate fair compensation or loss of legal or customary rights to land set out in the standard operating procedure (SOP) “Prosedur Penyelesaian Sengketa Lahan No.AA-GL-5003-1-R2”, dated 8th May 2015. The mechanism has taken into account FPIC Guide for RSPO Member 2015, whereby the procedure regulated information convey, negotiation, participative boundary measurement, involvement of other party and neighboring parties – in the boundary of the conflicted area (if any).</p>	Complied

		<p>Based on mechanism, public relation officer will receive information of any complaint, grievance and land dispute/claims and records under the logbook.</p> <p>PT IIS-Buatan II POM & Estate have not acquiring any additional land and not involved in any land compensation payments. Therefore the mechanism only applicable to resolve land dispute within company's HGU. Land ownership from previous landowner becomes important document in order to continue negotiation process against land claim. Land claim without supporting evidence of land ownership, will be treated with approach and legal manner.</p> <p>There is no negotiation/compensation payment currently for both estate and scheme smallholders. The land has settled now, no any complaint was received in the last few years. In Scheme smallholder's area, it was settled sicne the "PIR Project" started due to this project from Central Government, where the land status is "Clean and Clear".</p> <p>Based on the results of interviews with the Environment Agency (Dinas Lingkungan Hidup) and Plantation Agency (Dinas Perkebunan) of Pelalawan Regency, there is no land dispute between PT IIS – Buatan and the ownership of the surrounding community.</p> <p>The company provides opportunities and priorities for the surrounding community to get the right to work on the plantations of PT IIS - Buatan Group. Also the company has created an economic development and social responsibility program for the surrounding community in the form of a CSR program every year.</p> <p>Scheme Smallholders:</p> <p>Based on interview, Mulus Rahayu Cooperative, Kebun Sawit Harapan Cooperative and Bhirawa Bhkati Cooperative, sampled smallholder member</p>	
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		<p>and relevant authority, Dinas Perkebunan Kabupaten Pelalawan (plantation agency); there was no case of land conflict between smallholder member and/or conflict with other party related to land status or boundary.</p> <p>Cooperatives have a conflicts resolution mechanism in “Mekanisme Penanganan Konflik” dated 1st August 2014. The mechanism explaining flow process to resolution on land conflict, with involvement of company, village government and all related agencies.</p> <p>There is no new planting within certified area of PT Inti Indosawit Subur – Simpang Perak Estate and Buatan II Plasma after November 2005. Currently, replanting activities are still in progress. All of the immature area was for replanting, for oil palm with planting year 1988, 1989, 1990 and 1991.</p>	
<p>Criteria 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrated that they have legal customary, or user rights.</p>			
<p>4.8.1</p>	<p>Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.</p>	<p>Simpang Perak Estate and Scheme Smallholders:</p> <p>Based on documents review and interview with local government and local communities surrounding the company, it was noted that no customary land or legal rights within the company and scheme smallholder’s areas.</p> <p>All company plantation and scheme smallholder area have been issued with valid land title in the form of “Hak Guna Usaha/HGU” for company and “Sertifikat Hak Milik” for smallholder.</p> <p>Based on interview with Farmer Group No. 21 (KUD Mulus Rahayu) and kavling No. 509 and No. 515 and also with farmer group No. 94 (KUD Birawa Bhakti) kavling No. 1052, No. 1084 and No. 1085, the boundary markers between smallholder block, as well as boundary markers with</p>	<p>Complied</p>

		<p>neighboring farmer group has been established. There was no land dispute noted.</p>	
<p>4.8.2</p>	<p>(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.</p>	<p>Simpang Perak Estate and Schem Smallholder:</p> <p>PT. Inti Indosawit Subur – Buatn has prepared a mechanism to identify and calculate fair compensation or loss of legal or customary rights to land set out in the standard operating procedure (SOP) “Prosedur Penyelesaian Sengketa Lahan No.AA-GL-5003-1-R2”, dated 8th May 2015. The mechanism has taken into account FPIC Guide for RSPO Member 2015, whereby the procedure regulated information convey, negotiation, participative boundary measurement, involvement of other party and neighboring parties – in the boundary of the conflicted area (if any).</p> <p>Based on mechanism, public relation officer will receive information of any complaint, grievance and land dispute/claims and records under the logbook.</p> <p>PT IIS-Buatan II POM & Estate have not acquiring any additional land and not involved in any land compensation payments. Therefore the mechanism only applicable to resolve land dispute within company’s HGU. Land ownership from previous landowner becomes important document in order to continue negotiation process against land claim. Land claim without supporting evidence of land ownership, will be treated with approach and legal manner.</p> <p>There is no negotiation/compensation payment currently for both estate and scheme smallholders. The land has settled now, no any complaint was received in the last few years. In Scheme smallholder’s area, it was settled sicne the “PIR Project” started due to this project from Central Government, where the land status is “Clean and Clear”.</p> <p>Based on the results of interviews with the Environment Agency (Dinas Lingkungan Hidup) and Plantation Agency (Dinas Perkebunan) of</p>	<p>Complied</p>

		<p>Pelalawan Regency, there is no land dispute between PT IIS – Buatan and the ownership of the surrounding community.</p> <p>Based on interview with Farmer Group No. 21 (KUD Mulus Rahayu) and kavling No. 509 and No. 515 and also with farmer group No. 94 (KUD Birawa Bhakti) kavling No. 1052, No. 1084 and No. 1085, the boundary markers between smallholder block, as well as boundary markers with neighboring farmer group has been established. There was no land dispute noted.</p>	
4.8.3	<p>Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4).</p>	<p>Simpang Perak Estate and Schem Smallholder:</p> <p>PT. Inti Indosawit Subur – Buatan has prepared a mechanism to identify and calculate fair compensation or loss of legal or customary rights to land set out in the standard operating procedure (SOP) “Prosedur Penyelesaian Sengketa Lahan No.AA-GL-5003-1-R2”, dated 8th May 2015. The mechanism has taken into account FPIC Guide for RSPO Member 2015, whereby the procedure regulated information convey, negotiation, participative boundary measurement, involvement of other party and neighboring parties – in the boundary of the conflicted area (if any).</p> <p>Based on mechanism, public relation officer will receive information of any complaint, grievance and land dispute/claims and records under the logbook.</p> <p>PT IIS-Buatan II POM & Estate have not acquiring any additional land and not involved in any land compensation payments. Therefore the mechanism only applicable to resolve land dispute within company’s HGU. Land ownership from previous landowner becomes important document in order to continue negotiation process against land claim. Land claim without supporting evidence of land ownership, will be treated with approach and legal manner.</p>	Complied

		<p>There is no negotiation/compensation payment currently for both estate and scheme smallholders. The land has settled now, no any complaint was received in the last few years. In Scheme smallholder’s area, it was settled since the “PIR Project” started due to this project from Central Government, where the land status is “Clean and Clear”.</p> <p>Based on the results of interviews with the Environment Agency (Dinas Lingkungan Hidup) and Plantation Agency (Dinas Perkebunan) of Pelalawan Regency, there is no land dispute between PT IIS – Buatan and the ownership of the surrounding community.</p> <p>Based on interview with Farmer Group No. 21 (KUD Mulus Rahayu) and kavling No. 509 and No. 515 and also with farmer group No. 94 (KUD Birawa Bhakti) kavling No. 1052, No. 1084 and No. 1085, the boundary markers between smallholder block, as well as boundary markers with neighboring farmer group has been established. There was no land dispute noted.</p>	
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable).	<p>Simpang Perak Estate and Schem Smallholder:</p> <p>PT. Inti Indosawit Subur – Buatan has prepared a mechanism to identify and calculate fair compensation or loss of legal or customary rights to land set out in the standard operating procedure (SOP) “Prosedur Penyelesaian Sengketa Lahan No.AA-GL-5003-1-R2”, dated 8th May 2015. The mechanism has taken into account FPIC Guide for RSPO Member 2015, whereby the procedure regulated information convey, negotiation, participative boundary measurement, involvement of other party and neighboring parties – in the boundary of the conflicted area (if any).</p> <p>Based on mechanism, public relation officer will receive information of any complaint, grievance and land dispute/claims and records under the logbook.</p>	Complied

		<p>PT IIS-Buatan II POM & Estate have not acquiring any additional land and not involved in any land compensation payments. Therefore the mechanism only applicable to resolve land dispute within company's HGU. Land ownership from previous landowner becomes important document in order to continue negotiation process against land claim. Land claim without supporting evidence of land ownership, will be treated with approach and legal manner.</p> <p>There is no negotiation/compensation payment currently for both estate and scheme smallholders. The land has settled now, no any complaint was received in the last few years. In Scheme smallholder's area, it was settled since the "PIR Project" started due to this project from Central Government, where the land status is "Clean and Clear".</p> <p>Based on the results of interviews with the Environment Agency (Dinas Lingkungan Hidup) and Plantation Agency (Dinas Perkebunan) of Pelalawan Regency, there is no land dispute between PT IIS – Buatan and the ownership of the surrounding community.</p> <p>Based on interview with Farmer Group No. 21 (KUD Mulus Rahayu) and kavling No. 509 and No. 515 and also with farmer group No. 94 (KUD Birawa Bhakti) kavling No. 1052, No. 1084 and No. 1085, the boundary markers between smallholder block, as well as boundary markers with neighboring farmer group has been established. There was no land dispute noted.</p>	
<p>Principle 5: Support smallholder inclusion</p>			
<p>Include smallholders in RSPO supply chains and improve their livelihoods through fair and transparent partnerships.</p>			
<p>Criteria 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.</p>			
<p>5.1.1</p>	<p>Current and previous period prices for FFB are publicly available and accessible by smallholders.</p>	<p>Based on interview with management representative ie. Public affair staff, sustainability and plasma manager obtained information that the</p>	<p>Complied</p>

		<p>actual prices informed directly to the board of plasma or other FFB supplier. The actual prices also informed in front of mill gate.</p> <p>Further information will be verified during onsite audit.</p> <p>Onsite Audit:</p> <p>During the audit, Kebun Plasma Buatan has showed the FFB payment receipt period January 2021 in accordance with official FFB price that issued by FFB Pricing Team of Riau Province. All smallholder classified as up to 25 year which is the lower price due to the extraction that diminished. Sighted the payments record of KUD Mulus Rahayu and KUD Bhirawa Bakti period January 2021. All payments have been complied with the pricing that stipulated.</p>	
5.1.2	<p>(C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.</p>	<p>Based on document verification of Memorandum of Understanding (MoU) between the smallholders/KUD and PT Inti Indosawit Subur obtain information that the FFB pricing has followed the official FFB price stipulated by FFB Pricing Team of Riau Province. According to the local regulation in Riau Province, the FFB Price updated weekly (every 7 days). For example, minutes of meeting of FFB pricing meeting</p> <ul style="list-style-type: none"> • No: 46/TPH TBS-XI/2020 for period 18 – 24 November 2020. • No: 47/TPH TBS-XI/2020 for period 25 November – 1 December 2020. • No: 48/TPH TBS-XII/2020 for period 2 – 8 December 2020. • No: 49/TPH TBS-XII/2020 for period 9 – 15 December 2020. • No: 50/TPH TBS-XII/2020 for period 16 – 22 December 2020. 	Complied

		<p>The FFB payments conducted monthly. For example, there was a receipt of FFB payments period of November 2020 on behalf of KUD Bhirawa Bakti and KUD Mulus Rahayu on 2 January 2021.</p> <p>Meanwhile, FFB pricing for independent supplier following the fluctuation of CPO pricing. Through the interview with FFB supplier of Sawit Jaya Mandiri (supplied to Buatan I POM) and CV Mandiri Sentosa PBD-R (supplied to Buatan II POM) obtained information that the FFB price only updated if any changes. However, the FFB payments maximum 3 days after the mill received the FFB. There is no dispute related to FFB payments so far.</p>	
5.1.3	<p>(C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.</p>	<p>Management of PT Inti Indosawit Subur – Buatan Group has had a commitment to share the RSPO premium price in accordance with the agreement with their smallholder. Premium sharing is not distributed in the form of money but in the form of smallholder empowerment activities aimed at increasing the competence and competitiveness of smallholders based on participatory suggest from the smallholders.</p> <p>During this audit obtained information that the premium sharing for Buatan Plasma period 2020 has been handover on 10 December 2020. Buatan Plasma has held the training for smallholders namely “Alternative Income during Replanting Training” on November 2019 and January 2020 located in Bogor – Indonesia. Those training objectives is to prepare the smallholder to facing their monthly income situation during the replanting period.</p>	Complied

		Based on interview with the smallholder’s representatives known that the training has given the positive insight to the smallholders to facing the replanting period. Some smallholders have prepared the alternative income during the replanting with other business such as quail farm, goat and cows and domestic waste composting.	
5.1.4	(C) Evidences is available that all parties, including women and independent representative organization assisting smallholders where requested, are involved in the decision making processes and understand the contracts. These include involving finance, loans/credits, and repayments through FFB price reductions for replanting and/or, other support mechanisms where applicable.	The smallholder’s member of Buatan Plasma originated from government transmigration program on 1990 – 1991. Mostly from East Java, West Java and local area (Riau Province). Based on information obtained during the onsite audit known that some of smallholders’ member were women. The annual meeting of KUD always invited all members which is some women. All the decision made was involved the smallholder members, including women members.	Complied
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe.	Based on interview with management representative ie. Public affair staff, sustainability and plasma manager obtained information that all the contract is signed by both parties. Through the interview with FFB supplier of Sawit Jaya Mandiri (supplied to Buatan I POM) and CV Mandiri Sentosa PBD-R (supplied to Buatan II POM) obtained information that the FFB price only updated if any changes. However, the FFB payments maximum 3 days after the mill received the FFB (according to the contract). There is no dispute related to FFB payments so far. Based on document all contract is written in Bahasa.	Complied

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5.1.6	(C) Agreed payments are made in a timely manner and receipts specifying price, weigh, deductions and amount paid are given.	Based on document verification sighted that monthly invoice for FFB payment contains data of price, weigh, deductions and amount paid are given. Onsite Audit: Through the interview with FFB supplier of Sawit Jaya Mandiri (supplied to Buatan I POM) and CV Mandiri Sentosa PBD-R (supplied to Buatan II POM) obtained information that the FFB price only updated if any changes. However, the FFB payments maximum 3 days after the mill received the FFB (according to the contract). There is no dispute related to FFB payments so far.	Complied
5.1.7	Weighing equipment is verified by an independent third party on a regular basis.	According to the Indonesian regulation, verification of weigh bridge conducted annually. Sighted the record of validation from Trade and Industry Agency of Siak District as follows: <ul style="list-style-type: none">• Validation Letter No: 510.3/UPTMET/SKHP/2020/273 dated 12 October 2020 for weighbridge Avery Weight Tronix E1205 (capacity 50 MT), serial number 162056109. Validation renewal before 7 October 2021.• Validation Letter No: 510.3/UPTMET/SKHP/2020/274 dated 12 October 2020 for weighbridge Avery Weight Tronix E1205 (capacity 50 MT), serial number 161356025. Validation renewal before 11 September 2020. Based on that fact, this indicator has been met.	Complied
5.1.8	The unit of certification supports Independent smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholder on who runs the Internal	Simpang Perak Estate and Scheme Smallholder: PT IIS has a smallholder who cooperates and is incorporated in the CSV (Create Share Value) Program, namely: Sawit Jaya Mandiri Association with an area of 832 ha located in SP2, SP4 and SP6 with a total of 13	Complied

	<p>Controlling System (ICS), who holds the certificate, and who owns and sells certified materials.</p>	<p>farmer groups. The target of establishing CSV PT IIS Buatan I in 2020 is an area of 1,269 ha and until December 2020 has been realized an area of 832 ha or has reached 66%.</p> <p>To support the success of farmers in managing oil palm plantations, the Company has settled the CSV development program for the period 2020, the realization of the program until December 2020. This CSV development program includes: farmer competence, organizational / institutional, cooperation and best practices in managing oil palm plantations, as follows:</p> <ul style="list-style-type: none"> - Farmer Training in Certification Preparation including Group Dynamics training was conducted on April 14 2018. This training was also conducted for seadaya farmers (CSV program farmers) on October 3, 2020 which was attended by 38 farmers. - Independent Smallholder Coordination Meetings are held 2 times a year, the last being on February 13, 2020 - Harvest counseling to farmers on February 13, 2020 - Education related to the prevention of Covid-19 on April 17, 2020 - Provided assistance to farmers for road maintenance in the form of providing 383 tons of gravel. - Counseling on Making Appeal Signposts, in October 2019 - Provide assistance and training related to the management of owl (<i>tyto alba</i>) cages on August 15, 2019 - Road Repair Assistance in November 2020 	
5.1.9	<p>(C) The unit of certification has a grievance mechanism for smallholders, and all grievances raised are dealt with in a timely manner.</p>	<p>Simpang Perak Estate and Mill</p>	<p>Complied</p>

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		<p>Company has established a mechanism to handle complaint from external party, as written in "Mekanisme Penanganan Keluhan" – complaint handling mechanism (Doc. No. SOP AA-GL-5005-RO-01 dated 22 August 2011) while complaint from internal regulated under "Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan" – Employee' complaint and resolution mechanism (Doc. No. SOP-AA-HR-3008-RO 05) and responded not more than 14 days. These mechanisms have communicated to external parties and disseminated to PT IIS employees.</p> <p>Certificate holder has had new procedure namely <i>SOP Penyampaian dan Penyelesaian Keluhan Karyawan</i> (SOP No: AA-HR-308.5-R1 effective dated 1 December 2019). This procedure also protected whistle blower anonymity. Referring to Asian Agri's website https://www.asianagri.com/id/panel-keberlanjutan/keluhan-engaduan.</p> <p><i>Asian Agri is committed to responding quickly and constructively to any grievance raised against any of our own operations or our suppliers, and to report them publicly. We develop a robust grievance procedure to resolve all verifiable complaints and conflicts with all related stakeholders such as land conflicts, social conflicts, human right issues, labor issues, etc.</i></p> <table border="1" data-bbox="1160 1106 1944 1382"> <thead> <tr> <th data-bbox="1160 1106 1608 1157">Internal Reporting:</th> <th data-bbox="1608 1106 1944 1157">Channel/Remarks</th> </tr> </thead> <tbody> <tr> <td data-bbox="1160 1157 1608 1382"><i>There are log books located in all estates and mills managed by Asian Agri's business units. Employees are free to file concerns and reports in these log books, on matters related to Asian Agri's sustainability policy. Concerns on operation disruptions</i></td> <td data-bbox="1608 1157 1944 1382"> <p><i>Log Books:</i></p> <ul style="list-style-type: none"> • <i>Disruption</i> • <i>Complaint</i> </td> </tr> </tbody> </table>	Internal Reporting:	Channel/Remarks	<i>There are log books located in all estates and mills managed by Asian Agri's business units. Employees are free to file concerns and reports in these log books, on matters related to Asian Agri's sustainability policy. Concerns on operation disruptions</i>	<p><i>Log Books:</i></p> <ul style="list-style-type: none"> • <i>Disruption</i> • <i>Complaint</i> 	
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		<p><i>faced by employees may be documented in the Disruption Log Book. Issues pertaining to employee rights may be documented in the Complaint Log Book.</i></p>						
		<p><i>Confidential reports may be submitted through email or telephone to protect the identity of the reporter.</i></p>	<p><i>Poster on Whistleblowing is placed in every office of Asian Agri.</i></p> <ul style="list-style-type: none"> • Telephone: +62 811 910 7916 • Email: attention@asianagri.com 					
		<table border="1"> <thead> <tr> <th data-bbox="1120 893 1608 1005"><i>External Reporting:</i></th> <th data-bbox="1608 893 1944 1005"><i>Channel/Remarks</i></th> </tr> </thead> <tbody> <tr> <td data-bbox="1120 1005 1608 1351"> <p><i>Stakeholders of Asian Agri including but not limited to Government, smallholders, suppliers, vendors, academicians, NGOs, media, etc), are provided different channels to report their concerns/findings.</i></p> <p><i>Reporters may share their concerns and information on business misconduct, corruption,</i></p> </td> <td data-bbox="1608 1005 1944 1351"> <ul style="list-style-type: none"> • Email: grievance@asianagri.com • Address: Jl. MH Thamrin No. 31 Jakarta 10230 Indonesia </td> </tr> </tbody> </table>	<i>External Reporting:</i>	<i>Channel/Remarks</i>	<p><i>Stakeholders of Asian Agri including but not limited to Government, smallholders, suppliers, vendors, academicians, NGOs, media, etc), are provided different channels to report their concerns/findings.</i></p> <p><i>Reporters may share their concerns and information on business misconduct, corruption,</i></p>	<ul style="list-style-type: none"> • Email: grievance@asianagri.com • Address: Jl. MH Thamrin No. 31 Jakarta 10230 Indonesia 		
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		<p><i>harassment, criminal acts, environment, etc.</i></p> <p><i>All reports will be treated confidentially and if deemed appropriate, updates will be made publicly available as per our Grievance mechanism.</i></p>	<ul style="list-style-type: none"> <i>Fax: +62 21 230 1120</i> <i>Attn.: Grievance Secretariat</i> <p><i>Grievance submissions should be made using the Grievance Submission Form.</i></p>	
<p>This procedure is also applied to scheme smallholder operational. The procedure provides guidelines on handling grievances related to sustainability practices across our supply chain as well governance matters in our operations. The following grievance channels are available to support business transparency:</p> <p>Corporate policy has been socialized/dissemination to all levels of PT IIS – Buatan Group employees on 7-8 July 2020 (list of participants can be shown) and on stakeholders (including local contractors) on 9-10 July 2020 which was attended by 25 stakeholders.</p> <p>Scheme smallholders: The scheme smallholders have a mechanism of consultation and communication in “Mekanisme Komunikasi, Konsultasi dan Keluhan”, dated 3rd January 2011. The procedure has been communicated to all members on November 2019 and also recorded into the “Buku Pintar” for each of farmer.</p>				

Criteria 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.

<p>5.2.1</p>	<p>The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification.</p>	<p>PT IIS has a smallholder who cooperates and is incorporated in the CSV (Create Share Value) Program, namely: Sawit Jaya Mandiri Association with an area of 832 ha located in SP2, SP4 and SP6 with a total of 13 farmer groups. The target of establishing CSV PT IIS Buatan I in 2020 is an area of 1,269 ha and until December 2020 has been realized an area of 832 ha or has reached 66%.</p> <p>In 2021 there is a program to increase the area of CSV area of 140 Ha located in SP4 and SP6. The Company has settled the CSV development program for the period 2020, the realization of the program until December 2020 is as follows:</p> <ul style="list-style-type: none"> - Farmer Training in Certification Preparation including Group Dynamics training was conducted on April 14 2018. - Independent Smallholder Coordination Meetings are held 2 times a year, the last being on February 13, 2020 - Harvest counseling to farmers on February 13, 2020 - Education related to the prevention of Covid-19 on April 17, 2020 - Provided assistance to farmers for road maintenance in the form of providing 383 tons of gravel. - Counseling on Making Appeal Signborads, in October 2019 - Assistance for the procurement of owl (<i>Tyto alba</i>) barn (KBH: kandang Burung Hantu) on August 15, 2019 - Road Repair Assistance in November 2020 - Farmer Training in Certification Preparation including Group Dynamics training was conducted on April 14, 2018. 	<p>Complied</p>
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		<p>Based on an interview with CSV officer (Bpk. Achmad Roziqin Budi Santuso) has been conducted consultation with farmers on February 13, 2020 followed by 16 farmers and farmers group chairmen, that there are several expectations of petan, including:</p> <ul style="list-style-type: none"> - FFB prices are relatively stable - Assistance in developing BMP in increasing production - Assistance in maintaining production road access to the factory for smooth delivery of FFB to the mill <p>PT IIS has realized some of these farmers' hopes, including:</p> <ul style="list-style-type: none"> - Production facility assistance in the form of fertilizer procurement as much as 346 tons with payment made by credit for 6 months. - Repair of production roads and axle roads along 6 km, Providing assistance to farmers for road maintenance in the form of providing 383 tons of gravel material. - Planting the Host Plan as many points for pest and disease control - Installation of 5 units of owl cages for rat pest control. <p>The PT IIS CSV team has provided guidance to smallholder farmers by conducting several training activities, including:</p> <ul style="list-style-type: none"> - Training related to fertilizer use on February 26, 2020 was attended by 232 farmers - Farmer Training in Certification Preparation including Group Dynamics training was conducted on April 14 2018 <p>In general, farmers who are members of the CSV program, feel interested in RSPO certification, but there are some obstacles, including:</p>	
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		land legality (land certificate, institutional / organization that can be a forum for plantation activities).	
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>Simpang Perak Estate and POM:</p> <p>To support the success of farmers in managing oil palm plantations, the Company has settled the CSV development program for the period 2020, the realization of the program until December 2020. This CSV development program includes: farmer competence, organizational / institutional, cooperation and best practices in managing oil palm plantations, as follows:</p> <ul style="list-style-type: none"> - Farmer Training in Certification Preparation including Group Dynamics training was conducted on April 14 2018. This training was also conducted for seadaya farmers (CSV program farmers) on October 3, 2020 which was attended by 38 farmers. - Independent Smallholder Coordination Meetings are held 2 times a year, the last being on February 13, 2020 - Harvest counseling to farmers on February 13, 2020 - Education related to the prevention of Covid-19 on April 17, 2020 - Provided assistance to farmers for road maintenance in the form of providing 383 tons of gravel. - Counseling on Making Appeal Signposts, in October 2019 - Provide assistance and training related to the management of owl (<i>tyto alba</i>) cages on August 15, 2019 - Road Repair Assistance in November 2020 	Complied

<p>5.2.3</p>	<p>Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.</p>	<p>Simpang Perak Estate and POM:</p> <p>In supporting the legality of smallholder land, PT IIS has provided assistance in the effort to process the legality of farmers' land to obtain a Freehold Certificate (SHM), until December 2020 the SHM certificates that have been owned by farmers are as follows:</p> <ul style="list-style-type: none"> - Already have Certificate of SHM (<i>Sertifikat Hak Milik</i>): 106 Ha (12,7%) - Has a Village Letter (SKT/SKGR): 726 Ha (87,3%) <p>For independent Smallholder, support are given in form of CSV (Create Share Value). Member of CSV which have cooperation with the company are Sawit Jaya Mandiri (SJM). Form of support is the company give coaching to the independent smallholder related good agriculture practices, organisation and administration. Those independent smallholders expected to be certified in next few years.</p> <p>PT IIS already has a program to carry out a land legality process in collaboration with the Sawit Jaya Mandiri Association through the PRONA-PTSL (Complete Systematic Land Registration) program covering an area of 106 hectares.</p>	<p>Complied</p>
<p>5.2.4</p>	<p>(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.</p>	<p>Simpang Perak Estate and POM & Scheme Smallholder:</p> <p>PT IIS - Buatan Group has created a training program especially related to the handling/use of herbicides and pesticides for plasma farmers:</p> <ul style="list-style-type: none"> - Training on 18 September 2019; Limited Pesticides and K3 training, attended by 26 farmers from KUD Birawa Bakti. - March 28, 2019; Limited herbicide and K3 training / extension, attended by 22 participating farmers from KUD Mulus Rahayu. 	<p>Complied</p>

		<ul style="list-style-type: none"> - March 29, 2019; limited pesticide training and K3, attended by 23 plasma farmers from KUD Kebun Sawit Harapan. <p>In the 2020 period, the training program in plasma experienced problems with the Covid-19 pandemic, so that the counseling method was not carried out with a group of farmers but individually (per farmer) by plasma assistants.</p>	
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	<p>Simpang Perak Estate and POM & Scheme Smallholder:</p> <p>PT IIS has a smallholder who cooperates and is incorporated in the CSV (Create Share Value) Program, namely: Sawit Jaya Mandiri Association with an area of 832 ha located in SP2, SP4 and SP6 with a total of 13 farmer groups. The target of establishing CSV PT IIS Buatan I in 2020 is an area of 1,269 ha and until December 2020 has been realized an area of 832 ha or has reached 66%.</p> <p>The target for the formation of CSV PT IIS Artificial I in 2020 is an area of 1,269 hectares and as of December 2020 has realized an area of 832 hectares or has reached 66%. In 2021 there is a program to increase the CSV area of 140 hectares located in SP4 and SP6.</p> <p>Based on the results of the CSV report review for the period of 2021 are as follows:</p> <ul style="list-style-type: none"> - Based on the progress report on the achievement of the CSV program for the 2020 period, the area of the CSV program at PT IIS - Artificial Group has reached 832 Ha. - There are 4 farmer groups that are no longer active again with a total area of 586 hectares, namely the Sei Minai Farmer Group covering 100 hectares, the Rimba Cempedak Farmer Group covering an area of 117 hectares, the Manunggal Farmer Group covering an area of ?? 85 hectares and the Brotherhood Farmer 	Complied

		<p>Group covering an area of 285 hectares. Both farmer groups have been eliminated from the CSV program in 2020.</p> <ul style="list-style-type: none"> - The plan for 2021 will increase the area of 140 ha in the Sawit Jaya Mandiri Farmer Group to an area of 290 ha 	
<p>Principle 6: respect workers’ rights and conditions Protect workers’ rights and ensure safe and decent working conditions.</p>			
<p>Criteria 6.1: Any form of discrimination is prohibited.</p>			
<p>6.1.1</p>	<p>(C) A publicity available non-discrimination and equal opportunity policy is implemented in such way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.</p>	<p>PT Inti Indosawit Subur – Buatan Group has established the Company Policy on Equal Opportunities as documented in “Kebijakan Perusahaan”, dated 1st December 2014: “<i>Memperlakukan seluruh karyawan secara adil, baik dalam hal penerimaan, penilaian kondisi dan lingkungan kerja, serta keterwakilan tanpa memandang suku, kasta, asal Negara, agama/ kepercayaan, cacat, gender, orientasi seksual, keanggotaan serikat pekerja, afiliasi politik dan atau umur</i>” - to treat all member of cooperative in fair manner, and respect human rights, and representative without any discrimination on tribe, race, caste, country of origin, religion/belief, disability, gender, sexual orientation, union affiliation, political affiliation or age. The policy has communicated to all workers in Simpang PerakI Estate, last socialization conducted on 17th December 2020.</p> <p>Group Manager has established the ICS Policy under “Kebijakan Group Manager” dated 14th February 2020, that was signed by Manajer Group ICS Buatan, in point 9 was mentoned “<i>Menghormati HAM, serta keterwakilan tanpa memandang suku, kasta, asal negara, agama/kepercayaan, cacat, jender, orientasi seksual, keanggotaan serikat pekerja, afiliasi politik dan atau umur</i>” – to treat all member of cooperative in fair manner, and respect human rights, and representative without any discrimination on tribe, race, caste, country</p>	<p>Complied</p>

		of origin, religion/belief, disability, gender, sexual orientation, union affiliation, political affiliation or age. The Policy has communicated to all smallholder member.	
6.1.2	(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against. Evidence includes migrant workers non-payment of recruitment fees.	<p>Based on interview during onsite audit year 2021, workers were aware if there any cases of discrimination, e.g. document review of salary payment month November and December 2020, there was not find any evidence of discrimination.</p> <p>The workers and groups including local communities, women, and migrant workers have not been discriminated against</p>	Complied
6.1.3	The unit of certification demonstrates that the recruitment selection, hiring access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.	<p>PT Inti Indosawit Subur – Buatan II POM demonstrated the commitment that the recruitment selection, hiring access to training and promotion are based on skills, capabilities, qualities and medical fitness. Such as:</p> <ul style="list-style-type: none"> - The company has prepared a procedure for hiring workers, regulated that hiring and promotion of workers based on skill, work experiences, and job evaluation. - In the recruitment process, the company has set the standard of competence that inferred in the Position Description and Job Profile. Recruitment selection, hiring and promotion has based on skills, capabilities, qualities, and medical fitness. - Job opportunities were communicated and given to surrounding villagers at first priority where no discrimination found observed during interview and related records of workers being employed. All workers has treated equally in accordance with company regulation including rights of worker as well. The compliance in accordance with national laws has evaluated by the organisation as described in criterion 2.1. Annuals performance evaluation result of worker has shown. <p>All discrimination has prohibited for all area in estate and mill. PKB also mentioned ban of discrimination for all workers in the organization. Procedure for worker recruitment (SDM-A-001-00) and procedure for</p>	Complied

		employee assessment (HRD C- 002-00) was available and mentioned there was no discrimination treatment during recruitment and promotion process. Promotion of worker will be done base on work period, annual evaluation result, and availability of position.	
6.1.4	Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.	<p>PT Inti Indosawit Subur – Buatan Group prohibits pregnant or breast-feeding women to perform chemical spraying. In order to mitigate, estate performed monthly pregnancy test.</p> <p>PT Inti Indosawit Subur – Buatan II POM has kept the record that spraying is not conducted by pregnant or breast-feeding women. The company has been conducting PP Test (pregnant test) every month.</p> <p>The last of pregnancy test conducted on 4 October 2020, 8 November 2020 and 6 December 2020. All the female sprayer in well condition and not being pregnant nor breast feeding. E.g: Employee code: Mrs Sr* M*ry*t*</p>	Complied
6.1.5	(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.	<p>A gender committee was available in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>PT Inti Indosawit Subur – Buatan I POM has implemented the policy related to protection reproductive right; such as not hiring female for work activity with high risk; monthly pregnancy test for sprayer and fertilizer applicator; 6-monthly check up for sprayer and fertilizer applicator.</p> <p>All female worker in sprayer team and fertilizer team shall join pregnancy test in company clinic, once a month.</p> <p>Regular gender committee meeting on 3-monthly basis with focus to communicating roles and responsibilities for gender committee,</p>	Complied

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		<p>understanding the definition of sexual harassment in workplace. Communicating specific grievance mechanism to handle and resolve sexual harassment case.</p> <p>The last of pregnancy test conducted on 4 October 2020, 8 November 2020 and 6 December 2020. All the female sprayer in well condition and not being pregnant nor breast feeding. E.g: Employee code: Mrs Sr* M*ry*t*</p>	
6.1.6	There is evidence of equal pay for the same work scope.	<p>Company has had state about the wages for workers base on Decree of Keputusan Gubernur Riau No. Kpts. 1198/XI/2019", dated 21/11/2019 for Upah Minimum Kabupaten/Kota in Province of Riau is IDR 3,002,383.89/month for Pelalawan Regency. Subsequently the Sumatra Plantation Companies Cooperation Agency - Badan Kerjasama Perusahaan Perkebunan Sumatera (BKS-PPS) issued a Circular to members of the Sumatra Pre-Plantation Cooperation Agency (especially private companies in Riau Province) no. 17/BKS-PPS/2020 dated 24 February 2020 concerning an increase in the Minimum Wage for the Plantation Sector in 2020 amounting to IDR 3,020,000 per month. Furthermore, the determination of wages from the BKS-PPS is used as the minimum wage standard at PT IIS-Buatan Group.</p> <p>The Company has already set wage standard based on wages set by the government recorded on Memorandum no. ###/HR-R01/MEMO/04/2020, dated 12 January 2020; regarding: "Kenaikan Upah Pekerja Golongan SKUB" and also the determination of the daily wage for BHL (Daily workers) and PKWT employees (certain time workers). On this memorandum is also determine regarding structure of wage for each level worker (SKU-H and AKU-B). The company composes the structure and scale of the 2020 wage period based on Permenaker No. 1 of 2017. This wage scale structure is a determination of the amount of wages for permanent workers (SKU-B) based on class, rank/position.</p>	Complied

		<p>The company is also gives a scripts/slip salary to employees before salary is given, salary slip also contains basic salary, allowances, premium, labor health coverage (BPJS Ketenagakerjaan and Kesehatan) and deduction as well.</p> <p>Taken sample of salary slip for period December 2020. Based on sample salary slip, confirmed that the company has paid wages employees salary according to the working days and it is applied in a fair to all employees.</p> <p>In detail about the components of wages given to workers, poured in employee salary slips/scripts provided every month before payday.</p> <p>Payroll or salary slips/scripts on December 2020 period</p> <p><u>Buatan II Mill:</u></p> <ol style="list-style-type: none"> 1. Mr. Ri#. Ma***1 (BHL-Daily worker); Day of Work: 17 days <ul style="list-style-type: none"> - Basic salary IDR 2,053,600; - Process premium IDR -; - Deductions: IDR 102,424; (including Payment of BPJS Kese and Ketenagakerjaan - Total take home pay: IDR 1,951,176. 2. Mr. Pi*** Sj**r (BHL- Daily worker) Day of Work: 18 days <ul style="list-style-type: none"> - Basic salary IDR 2,174,400; - Process Premium IDR 916,474; - Deductions: IDR 102,424; (including Payment of BPJS Kese and Ketenagakerjaan - Total take home pay: IDR 2,988,450. <p><u>Simpang Perak Estate:</u></p>	
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		<p>1. Ms. Ru****la (BHL-Daily worker); Day of Work: 15 days - Basic salary IDR 1,812,000; - Premium IDR 165,800; - Deductions: IDR 60,400; (including Payment of BPJS Kes. and Ketenagakerjaan - Total take home pay: IDR 1,917,400.</p> <p>2. Ms. Re****a (BHL-Daily worker); Day of Work: 15 days - Basic salary IDR 1,812,000; - Premium IDR 50,000; - Deductions: IDR 60,400; (including Payment of BPJS Kes. and Ketenagakerjaan - Total take home pay: IDR 1,801,600.</p> <p>Data verified:</p> <ul style="list-style-type: none"> - Collective Labor Agreement - Perjanjian Kerja Bersama (PKB) period 2018-2020. - Daily Working Agreement - Perjanjian Kerja Harian Lepas. - Payslip – Payroll period Desember 2020 <p>Scheme Smallholder <u>Buatan II Plasma:</u> Mr. Sri****o (SKUH-Fixed worker at ICS Officer); Day of Work: 25 days - Basic salary IDR 2,397,925; - Fringe Benefits IDR 479,925; - Premium IDR 400,000;</p>	
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		<ul style="list-style-type: none"> - Deductions: IDR 120,677; (including Payment of BPJS Kese and Ketenagakerjaan - Total take home pay: IDR 3,156,833. <p>Data verified:</p> <ul style="list-style-type: none"> - Collective Labor Agreement - Perjanjian Kerja Bersama (PKB) period 2018-2020. - Daily Working Agreement - Perjanjian Kerja Harian Lepas. - Payslip – Payroll period December 2020 <p>The application of employee harvest and fertilizer wages in Plasma Buatan II is based on Decree of Gubernur Riau SK no. KPTS 599/III/2020, dated 18 March 2020; regarding: “Penetapan Upah Minimum Sektor Perkebunan Provinsi Riau Tahun 2020” amount of Rp 3,020,000 and also state on working agreement letter - “Surat Perjanjian Kerjasama”, i.e:</p> <p>Working Agreement Letter on behalf of Mr. Budi (as Harvester) at Bhirawa Bhakti Cooperative dated 2 December 2019. Determining of wages, state on Article 2; Upah Atau Imbalan: The Wages/benefits is given monthly are calculated based on Rp/kg of FFB harvested per rotation, amounting to IDR 150 per kg of FFB, working for 5-6 hours per day (starting at 07.00 - 14.00).</p> <p>Payment of harvest wages is done hand over payment in the form of payment receipts from farmers (Farmer Groups) directly to the harvesters, i.e:</p> <ul style="list-style-type: none"> - Harvesters on behalf of Ferdi for the harvest on Bpk. Suryadi filed member of KUD Bhirawa Bhakti period January 2021, for harvesting FFB: rotation 1,2 and 3: 3,960 kg FFB, with wages of IDR 145 per 	
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		<p>kg, total wages of IDR 575,000.</p> <ul style="list-style-type: none"> - Harvesters on behalf of Kariyo for the harvest on Bpk. Supio filed member of KUD Kebun Sawit Harapan period Desember 2020, for harvesting FFB: rotation 1,2 and 3: 3,800 kg FFB, with wages of IDR 140 per kg, total wages of IDR 532,000. - Fertilizer wages in KUD Buatn Jaya on behalf of Rahmat for the period June 2020 on Bpk. Radisun filed, the type of Dolomite fertilizer is 215 kg (@IDR 240), so the amount of wages received is IDR 56,600. <p>The company gives salary slips to all employees the day before payday. The salary slip is also written on the number of workdays of employees, example of salary slips can be seen in 6.1.6 above.</p>	
<p>Criteria 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).</p>			
<p>6.2.1</p>	<p>(C) Documentation of pay and working conditions in accordance with applicable labour laws are available to the workers in national languages and explained to them in language they understand.</p>	<p>Buatan II POM and Estate:</p> <p>The company have established work agreement for permanent employees through joint work agreement (PKB-Perjanjian Kerja Bersama) in term for 2 years. During the audit the PKB is for period of 2018 – 2020 and has done registered by Dirjen PHI/JSK the Ministry of Employment on 4 July 2018.</p> <p>The company has set employment provisions in accordance with the rules and legal requirement. It is stated on employment contract off daily labour on article 1 about the types of work, working hours (maximum 40 hours per week and working from Monday to Saturday) and the wages has provides is based on waging regulation (Decree of Governor of Riau) in effect at January 2020. Statements about wages,</p>	<p>Complied</p>

		<p>stated in PKB in Article V concerning Wages-Upah; stated: "<i>Pekerja harian Tetap dan Pekerja Bulanan diberi upah berupa uang yang ditetapkan berdasarkan kesepakatan bersama dengan BKS-PPS dengan PD.FSP.PP-SPSi Propinsi yang bersangkutan sesuai dengan peraturan perundangan Otonomi Daerah yang berlaku, yaitu upah uang ditambah beras pekerja senilai/sejumlah 15 Kg (Upah BKS-PPS), dengan mengingat situasi ekonomi dan kemampuan perusahaan</i>".</p> <p>The Joint working Agreement (PKB 2018-2020 period) and the daily labour contract of the wage was presented in Bahasa Indonesia, so all employees can understand it and this PHL work agreement is handed over to the workers concerned after being described by the management (through KTU), so that employees who can not read the writing can understood.</p> <p>The application of wages for daily/temporary employees (PHL and PKWT) has been explained in the Daily Worker Agreement, in Article 4 on Wages and Payments, states: "The Parties agree that the wages received by the Second Party (Worker) per work day are the wages currently in force for the First Party in accordance with Provincial UMP is Rp 112,800 per working day.</p> <p>The certificate holder PT IIS - Buatan Group has set the structure of the employee wage scale for the 2020 period set on June 4, 2020, as follow:</p> <p>List of Employees Wage Structure PT IIS – Buatan Group 2020 Period</p>	
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		Daftar Upah Pekerja PHL Plantation 2 -Riau 2020						
NO	PT	UNIT	UPAH 2019	KENAIKAN 2020	UPAH 2020	UPAHIHARI	KETERANGAN	
1	PT. IIS	KJK	2,820,000	200,000	3,020,000	120,800	UMSP RIAU 2020	
2	PT. IIS	KSA	2,820,000	200,000	3,020,000	120,800	UMSP RIAU 2020	
3	PT. IIS	KSL	2,820,000	200,000	3,020,000	120,800	UMSP RIAU 2020	
4	PT. IIS	KLU	2,820,000	200,000	3,020,000	120,800	UMSP RIAU 2020	
5	PT. IIS	PUS	2,820,000	200,000	3,020,000	120,800	UMSP RIAU 2020	
6	PT. IIS	PUD	2,820,000	200,000	3,020,000	120,800	UMSP RIAU 2020	
7	PT. IIS	KBN	2,820,000	200,000	3,020,000	120,800	UMSP RIAU 2020	
8	PT. IIS	KSP	2,820,000	200,000	3,020,000	120,800	UMSP RIAU 2020	
9	PT. IIS	KLB	2,820,000	200,000	3,020,000	120,800	UMSP RIAU 2020	
10	PT. IIS	KVB	2,820,000	200,000	3,020,000	120,800	UMSP RIAU 2020	
11	PT. IIS	KBN-K	2,820,000	200,000	3,020,000	120,800	UMSP RIAU 2020	
12	PT. IIS	PBS	2,820,000	200,000	3,020,000	120,800	UMSP RIAU 2020	
13	PT. IIS	PBD	2,820,000	200,000	3,020,000	120,800	UMSP RIAU 2020	
14	PT. IIS	KGS	2,820,000	225,451	3,045,451	121,818	UMK KUANSING 2020	
15	PT. IIS	PSP	2,820,000	225,451	3,045,451	121,818	UMK KUANSING 2020	
16	MUP	KST	2,820,000	200,000	3,020,000	120,800	UMSP RIAU 2020	
17	MUP	KPR	2,820,000	200,000	3,020,000	120,800	UMSP RIAU 2020	

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Daftar Upah Pekerja SKU-H								Natura 15kg (9.500/kg)
Plantation 2 -Riau								142,500
2020								
NO	PT	UNIT	UPAH 2019	KENAIKAN 2020	UPAH 2020	UPAH/HARI	KETERANGAN	N (Uar
1	PT. IIS	KUK	2,679,000	198,500	2,877,500	95,917	Upah BKS-PPS Riau 202	
2	PT. IIS	KSA	2,679,000	198,500	2,877,500	95,917	Upah BKS-PPS Riau 202	
3	PT. IIS	KSL	2,679,000	198,500	2,877,500	95,917	Upah BKS-PPS Riau 202	
4	PT. IIS	KLU	2,679,000	198,500	2,877,500	95,917	Upah BKS-PPS Riau 202	
5	PT. IIS	PUS	2,679,000	198,500	2,877,500	95,917	Upah BKS-PPS Riau 202	
6	PT. IIS	PUD	2,679,000	198,500	2,877,500	95,917	Upah BKS-PPS Riau 202	
7	PT. IIS	KBN	2,679,000	198,500	2,877,500	95,917	Upah BKS-PPS Riau 202	
8	PT. IIS	KSP	2,679,000	198,500	2,877,500	95,917	Upah BKS-PPS Riau 202	
9	PT. IIS	KLB	2,679,000	198,500	2,877,500	95,917	Upah BKS-PPS Riau 202	
10	PT. IIS	KVB	2,679,000	198,500	2,877,500	95,917	Upah BKS-PPS Riau 202	
11	PT. IIS	KBN-K	2,679,000	198,500	2,877,500	95,917	Upah BKS-PPS Riau 202	
12	PT. IIS	PBS	2,679,000	198,500	2,877,500	95,917	Upah BKS-PPS Riau 202	
13	PT. IIS	PBD	2,679,000	198,500	2,877,500	95,917	Upah BKS-PPS Riau 202	
14	PT. IIS	KGS	2,679,000	223,951	2,902,951	96,765	UMK KUANSING 2020	
15	PT. IIS	PSP	2,679,000	223,951	2,902,951	96,765	UMK KUANSING 2020	
16	MUP	KST	2,679,000	198,500	2,877,500	95,917	Upah BKS-PPS Riau 202	

Company has had state about the wages for workers base on Decree of Keputusan Gubernur Riau No. Kpts. 1198/XI/2019", dated 21/11/2019 for Upah Minimum Kabupaten/Kota in Province of Riau is IDR 3,002,383.89/month for Pelalawan Regency. Subsequently the Sumatra Plantation Companies Cooperation Agency - Badan Kerjasama Perusahaan Perkebunan Sumatera (BKS-PPS) issued a Circular to members of the Sumatra Pre-Plantation Cooperation Agency (especially private companies in Riau Province) no. 17/BKS-PPS/2020 dated 24 February 2020 concerning an increase in the Minimum Wage for the Plantation Sector in 2020 amounting to IDR 3,020,000 per month. Furthermore, the determination of wages from the BKS-PPS is used as the minimum wage standard at PT IIS-Buatan Group.

The Company has already set wage standard based on wages set by the government recorded on Memorandum no. ###/HR-

		<p>R01/MEMO/04/2020, dated 12 January 2020; regarding: "Kenaikan Upah Pekerja Golongan SKUB" and also the determination of the daily wage for BHL (Daily workers) and PKWT employees (certain time workers). On this memorandum is also determine regarding structure of wage for each level worker (SKU-H and AKU-B). The company composes the structure and scale of the 2020 wage period based on Permenaker No. 1 of 2017. This wage scale structure is a determination of the amount of wages for permanent workers (SKU-B) based on class, rank/position.</p> <p>Scheme Smallholder</p> <p>The application of employee harvest and fertilizer wages in Plasma Buatan I is based on Decree of Gubernur Riau SK no. KPTS 599/III/2020, dated 18 March 2020; regarding: "Penetapan Upah Minimum Sektor Perkebunan Provinsi Riau Tahun 2020" amount of Rp 3,020,000 and also state on working agreement letter - "Surat Perjanjian Kerjasama", i.e: Working Agreement Letter on behalf of Mr. Budi (as Harvester) at Buatan Jaya Cooperative dated 2 December 2019. Determining of wages, state on Article 2; Upah Atau Imbalan: The Wages/benefits is given monthly are calculated based on Rp/kg of FFB harvested per rotation, amounting to IDR 150 per kg of FFB, working for 5-6 hours per day (starting at 07.00 - 14.00). Whereas for fertilizer application, determine in a work agreement is IDR 250 per kg fertilizer except for Borate fertilizer IDR 12,500 per sack/bag.</p> <p>Payment of harvest wages is done hand over payment in the form of payment receipts from farmers (Farmer Groups) directly to the harvesters, i.e:</p> <ul style="list-style-type: none"> - Harvesters on behalf of Ferdi for the harvest on Bpk. Suryadi 	
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		<p>filed member of KUD Bhirawa Bhakti period January 2021, for harvesting FFB: rotation 1,2 and 3: 3,960 kg FFB, with wages of IDR 145 per kg, total wages of IDR 575,000.</p> <ul style="list-style-type: none"> - Harvesters on behalf of Kariyo for the harvest on Bpk. Supio filed member of KUD Kebun Sawit Harapan period Desember 2020, for harvesting FFB: rotation 1,2 and 3: 3,800 kg FFB, with wages of IDR 140 per kg, total wages of IDR 532,000. - Fertilizer wages in KUD Buatan Jaya on behalf of Rahmat for the period June 2020 on Bpk. Radisun filed, the type of Dolomite fertilizer is 215 kg (@IDR 240), so the amount of wages received is IDR 56,600 	
6.2.2	<p>(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed.</p>	<p>Buatan II POM and Estate:</p> <p>The Joint working Agreement (PKB 2018-2020 period) and the daily labour contract of the wage was presented in Bahasa Indonesia, so all employees can understand it and this PHL work agreement is handed over to the workers concerned after being described by the management (through KTU), so that employees who can not read the writing can understood.</p> <p>The company has set employment provisions in accordance with the rules and legal requirement. It is stated on employment contract off daily labour on article 1 about the types of work, working hours (maximum 40 hours per week and working from Monday to Saturday) and the wages has provides is based on waging regulation (Decree of Governor of Riau) in effect at January 2020. Statements about wages, stated in PKB in Article V concerning Wages-Upah; stated: "<i>Pekerja harian Tetap dan Pekerja Bulanan diberi upah berupa uang yang ditetapkan berdasarkan kesepakatan bersama dengan BKS-PPS dengan PD.FSP.PP-SPSi Propinsi yang bersangkutan sesuai dengan peraturan</i></p>	Complied

		<p><i>perundangan Otonomi Daerah yang berlaku, yaitu upah uang ditambah beras pekerja senilai/sejumlah 15 Kg (Upah BKS-PPS), dengan mengingat situasi ekonomi dan kemampuan perusahaan”.</i></p> <p>Determination of wages (including benefits and other benefit/premium), working hours (including hours and overtime pay) and working days have been regulated in the PKB Period 2018-2020 in Article V; <i>Upah - Wages</i>, which explains:</p> <ul style="list-style-type: none"> a) Permanent workers are given wages, the value of which is determined by the employer on the condition that it is not lower than government regulations. b) Certain permanent workers are given wages (Basic Salary and Rice) in accordance with the status of the group/level whose value is determined by the employer with provisions not lower than government regulations c) Permanent workers receive additional wages (UMP/UMSK) and / or attendance incentives as stipulated further in separate provisions. <p>Rice allowance is: 9 kg and each anal (maximum 3 children) is given 7.5 kg per month, which consists of the basic salary and rice allowance. Rice supply is given once a month. Rice supply is intended to be of good quality and is considered appropriate for the health of the Worker and the gift is linked to attendance.</p> <p>Provisions on holidays and leave (both maternity leave and menstruation leave) have been regulated in Article VIII regarding Non-working Days; including: absenteeism, rest days of the week, official holidays, annual leave, maternity leave and others.</p> <p>Workers with Daily Workers (BHL) status, related to remuneration are</p>	
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		<p>explained in Article 4 of the Daily Work Agreement; Wages and Payments, state: "<i>Para pihak sepakat bahwa upah yang diterima pihak kedua (pekerja) per hari kerja adalah upah yang berlaku saat ini pada pihak pertama (Perusahaan) sesuai dengan UMP Provinsi Riau Tahun 2020 yaitu sebesar Rp 112.800 per hari kerja</i>". Taken sample: Daily Working Agreement No. 124/PKHL/KSP/II/2020, February 18, 2020 on behalf of Mr. Anggi Yuniar for the type of upkeep plant. Daily Working Agreement No. 092/PKHL/II/2020 dated February 8, 2020 on behalf of Mr. Burben with the type of upkeep plant.</p> <p>In detail about the components of wages given to workers, poured in employee salary slips/scripts provided every month before payday.</p> <p>Payroll or salary slips/scripts on December 2020 period</p> <p><u>Buatan II Mill:</u></p> <ol style="list-style-type: none"> 1. Mr. Ri#. Ma***1 (BHL-Daily worker); Day of Work: 17 days <ul style="list-style-type: none"> - Basic salary IDR 2,053,600; - Process premium IDR -; - Deductions: IDR 102,424; (including Payment of BPJS Kese and Ketenagakerjaan - Total take home pay: IDR 1,951,176. 2. Mr. Pi*** Sj**r (BHL- Daily worker) Day of Work: 18 days <ul style="list-style-type: none"> - Basic salary IDR 2,174,400; - Process Premium IDR 916,474; - Deductions: IDR 102,424; (including Payment of BPJS Kese and Ketenagakerjaan - Total take home pay: IDR 2,988,450. 	
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		<p><u>Simpang Perak Estate:</u></p> <p>3. Ms. Ru****la (BHL-Daily worker); Day of Work: 15 days - Basic salary IDR 1,812,000; - Premium IDR 165,800; - Deductions: IDR 60,400; (including Payment of BPJS Kes. and Ketenagakerjaan - Total take home pay: IDR 1,917,400.</p> <p>4. Ms. Re***a (BHL-Daily worker); Day of Work: 15 days - Basic salary IDR 1,812,000; - Premium IDR 50,000; - Deductions: IDR 60,400; (including Payment of BPJS Kes. and Ketenagakerjaan - Total take home pay: IDR 1,801,600.</p> <p>Data verified:</p> <ul style="list-style-type: none"> - Collective Labor Agreement - Perjanjian Kerja Bersama (PKB) period 2018-2020. - Daily Working Agreement - Perjanjian Kerja Harian Lepas. - Payslip – Payroll period December 2020 <p>Scheme Smallholder</p> <p><u>Buatan II Plasma officer:</u></p> <p>1. Mr. Srij****o (SKUH-Fixed worker at ICS Officer); Day of Work: 25 days - Basic salary IDR 2,397,925; - Fringe Benefits IDR 479,925; - Premium IDR 400,000;</p>	
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		<ul style="list-style-type: none"> - Deductions: IDR 120,677; (including Payment of BPJS Kese and Ketenagakerjaan - Total take home pay: IDR 3,156,833. <p>The application of employee harvest and fertilizer wages in Plasma Buatan II is based on Decree of Gubernur Riau SK no. KPTS 599/III/2020, dated 18 March 2020; regarding: "Penetapan Upah Minimum Sektor Perkebunan Provinsi Riau Tahun 2020" amount of IDR 3,020,000. The determination of wages for the 2021 period has not changed from the 2020 period, based on the Decree of the Governor of Riau No. Kpts.1581/XI/2020 November 20, 2020 concerning District / City Minimum Wages in Riau Province in 2021, amounting to IDR 3,002,383.89 per month and also state on working agreement letter - "Surat Perjanjian Kerjasama", i.e: Working Agreement Letter on behalf of Mr. Budi (as Harvester) at Bhirawa Bhakti Cooperative dated 2 December 2019. Determining of wages, state on Article 2; Upah Atau Imbalan: The Wages/benefits is given monthly are calculated based on Rp/kg of FFB harvested per rotation, amounting to IDR 150 per kg of FFB, working for 5-6 hours per day (starting at 07.00 - 14.00).</p> <p>Whereas for fertilizer application, determine in a work agreement is IDR 250 per kg fertilizer except for Borate fertilizer IDR 12,500 per sack/bag.</p> <p>Payment of harvest wages is done hand over payment in the form of payment receipts from farmers (Farmer Groups) directly to the harvesters, i.e:</p> <p><u>Data Verified:</u></p> <ul style="list-style-type: none"> • Harvesters on behalf of Ferdi for the harvest on Bpk. Suryadi filed member of KUD Bhirawa Bhakti period January 2021, for harvesting FFB: rotation 1,2 and 3: 3,960 kg FFB, with wages 	
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		<p>of IDR 145 per kg, total wages of IDR 575,000.</p> <ul style="list-style-type: none"> • Harvesters on behalf of Kariyo for the harvest on Bpk. Supio filed member of KUD Kebun Sawit Harapan period Desember 2020, for harvesting FFB: rotation 1,2 and 3: 3,800 kg FFB, with wages of IDR 140 per kg, total wages of IDR 532,000. • Fertilizer wages in KUD Buatan Jaya on behalf of Rahmat for the period June 2020 on Bpk. Radisun filed, the type of Dolomite fertilizer is 215 kg (@IDR 240), so the amount of wages received is IDR 56,600. • The company gives salary slips to all employees the day before payday, The salary slip is also written on the number of workdays of employees, example of salary slips can be seen in 6.1.6 above. 	
6.2.3	<p>(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, and other legal labour requirements.</p>	<p>Buatan II POM and Estate:</p> <p>The Joint working Agreement (PKB 2018-2020 period) and the daily labour contract of the wage was presented in Bahasa Indonesia, so all employees can understand it and this PHL work agreement is handed over to the workers concerned after being described by the management (through KTU), so that employees who can not read the writing can understood.</p> <p>The company has set employment provisions in accordance with the rules and legal requirement. It is stated on employment contract off daily labour on article 1 about the types of work, working hours (maximum 40 hours per week and working from Monday to Saturday) and the wages has provides is based on waging regulation (Decree of Governor of Riau) in effect at January 2020.</p>	Complied

		<p>Statements about wages, stated in PKB in Article V concerning Wages-Upah; stated: <i>"Pekerja harian Tetap dan Pekerja Bulanan diberi upah berupa uang yang ditetapkan berdasarkan kesepakatan bersama dengan BKS-PPS dengan PD.FSP.PP-SPSi Propinsi yang bersangkutan sesuai dengan peraturan perundangan Otonomi Daerah yang berlaku, yaitu upah uang ditambah beras pekerja senilai/sejumlah 15 Kg (Upah BKS-PPS), dengan mengingat situasi ekonomi dan kemampuan perusahaan"</i>.</p> <p>Determination of wages (including benefits and other benefit/premium), working hours (including hours and overtime pay) and working days have been regulated in the PKB Period 2018-2020 in Article V; <i>Upah - Wages</i>, which explains:</p> <ul style="list-style-type: none"> d) Permanent workers are given wages, the value of which is determined by the employer on the condition that it is not lower than government regulations. e) Certain permanent workers are given wages (Basic Salary and Rice) in accordance with the status of the group/level whose value is determined by the employer with provisions not lower than government regulations f) Permanent workers receive additional wages (UMP/UMSK) and / or attendance incentives as stipulated further in separate provisions. <p>Rice allowance is: 9 kg and each anal (maximum 3 children) is given 7.5 kg per month, which consists of the basic salary and rice allowance. Rice supply is given once a month. Rice supply is intended to be of good quality and is considered appropriate for the health of the Worker and the gift is linked to attendance.</p> <p>Provisions on holidays and leave (both maternity leave and menstruation</p>	
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		<p>leave) have been regulated in Article VIII regarding Non-working Days; including: absenteeism, rest days of the week, official holidays, annual leave, maternity leave and others.</p> <p>Workers with Daily Workers (BHL) status, related to remuneration are explained in Article 4 of the Daily Work Agreement; Wages and Payments, state: "<i>Para pihak sepakat bahwa upah yang diterima pihak kedua (pekerja) per hari kerja adalah upah yang berlaku saat ini pada pihak pertama (Perusahaan) sesuai dengan UMP Provinsi Riau Tahun 2020 yaitu sebesar Rp 112.800 per hari kerja</i>". Taken sample: Daily Working Agreement No. 124/PKHL/KSP/II/2020, February 18, 2020 on behalf of Mr. Anggi Yuniar for the type of upkeep plant. Daily Working Agreement No. 092/PKHL/II/2020 dated February 8, 2020 on behalf of Mr. Burben with the type of upkeep plant.</p>	
6.2.4	<p>(C) The unit of certification provides adequate housing. Sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.</p>	<p>Buatan II POM and Estate: Buatan II POM has prepared facilities for their workers, such as: Housing Mess (1 unit), type B (4 units), Type D (17 units), Type D1 (20 units), Type D2 (24 units), Type E (486 units), polyclinic (2 units), mosque (2 units), church (1 unit), community hall (1 unit), sport facilities, school bus (5 units), kindergarden (1 units), electricity, water supply, etc. Buatan Estate has prepared facilities for their workers, such as:</p> <ul style="list-style-type: none"> - Housing complex (399 units) - Elementary (1 unit) and kindergarden (1 units) - Polyclinic (1 unit) - Mosque (2 units) - Church (1 unit) - School bus (2 units) - Ambulance (1 unit) - Sport facilities 	Complied

		<p>- Etc. Company performed regular water quality test, whereby the source from worker housing's well. The Company also has a Budget for employee housing improvements every year, based on the 2020 employee home improvement budget. The budget has been distributed based on cash flow / detailing every month for a year, for example:</p> <table border="1" data-bbox="1131 603 1944 960"> <thead> <tr> <th rowspan="2">Employee Housing</th> <th colspan="3">Haousing Renovation Year 2020</th> </tr> <tr> <th>Plan (Unit)</th> <th>Realization (Unit)</th> <th>Cost (IDR)</th> </tr> </thead> <tbody> <tr> <td>Housing for Staff</td> <td>3</td> <td>3</td> <td>6.000.000</td> </tr> <tr> <td>Type B.1</td> <td>6</td> <td>4</td> <td>6.800.000</td> </tr> <tr> <td>Type B.2</td> <td>10</td> <td>9</td> <td>20.500.000</td> </tr> <tr> <td>Type B.3</td> <td>7</td> <td>2</td> <td>5.750.000</td> </tr> <tr> <td>Total</td> <td>26</td> <td>18</td> <td>39.050.000</td> </tr> </tbody> </table> <p>Scheme smallholders: All workers in Plasma has own house with water and electricity supplies from government (PLN). Based on interview with smallholder in KUD Kebun Sawit Harapan, KUD Bhirawa Bhakti, KUD Buatan Jaya and KUD Mulus Rahayu explained that the worker has their own house in the village.</p>	Employee Housing	Haousing Renovation Year 2020			Plan (Unit)	Realization (Unit)	Cost (IDR)	Housing for Staff	3	3	6.000.000	Type B.1	6	4	6.800.000	Type B.2	10	9	20.500.000	Type B.3	7	2	5.750.000	Total	26	18	39.050.000	
Employee Housing	Haousing Renovation Year 2020																													
	Plan (Unit)	Realization (Unit)	Cost (IDR)																											
Housing for Staff	3	3	6.000.000																											
Type B.1	6	4	6.800.000																											
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Type B.3	7	2	5.750.000																											
Total	26	18	39.050.000																											
6.2.5	The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.	<p>Buatan II POM and Estate: The company has minimarket which managed by the cooperative and traditional market is nearby surrounding company area, mostly goods</p>	Complied																											

		<p>needed by employees is provided by the minimarket. Price in minimarket was affordable and cheaper than traditional market nearby company area. Price control by cooperative and all member including workers and company management.</p> <p>Scheme smallholders:</p> <p>There is a market in the village which smallholder workers stay. Access road and the availability of foods and other basic needs was easy to found with competitive price/affordable. Price determined by the market and control by government.</p>	
6.2.6	<p>A DLW is paid to all workers in accordance with applicable regulations, including workers who work on a piece rate/quota basis, the calculation of which is based on a quota that can be achieved during regular working hours.</p>	<p>Buatan II POM and Estate:</p> <p>Determination of wage for period 2020 is based on Decree of Gubernur Riau SK no. KPTS 599/III/2020, dated 18 March 2020; regarding: "Penetapan Upah Minimum Sektor Perkebunan Provinsi Riau Tahun 2020" amount of IDR 3,020,000.</p> <p>The Company has already set wage standard based on wages set by the government recorded on Memorandum no. ###/HR-R01/MEMO/04/2020, dated 12 January 2020; regarding: "Kenaikan Upah Pekerja Golongan SKUB" and also the determination of the daily wage for BHL (Daily workers) and PKWT employees (certain time workers) see 6.2.1 above. The company is also gives a scripts/slip salary to employees before salary is given, salary slip also contains basic salary, allowances, premium, labor health coverage (BPJS Tenaga kerja and Kesehatan) and deduction.</p> <p>The company also made calculations related to DLW, based on the wages given to employees as costs given by the company:</p>	Complied

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		<p>Following is DLW Calculation:</p> <table border="1"> <thead> <tr> <th style="background-color: #c6e0b4;">In Kind Benefits</th> <th>SKU</th> <th>PHL</th> <th>Total Estate</th> </tr> </thead> <tbody> <tr> <td>Housing (Cost of Building :30 years)+(Annual Maintenance:Number of houses):12 Months</td> <td>262.357</td> <td>262.357</td> <td>262.357</td> </tr> <tr> <td>Electricity & Water (Annual Cost of Water & Electricity ÷ Number of Houses) ÷ 12 months</td> <td>61.435</td> <td>61.435</td> <td>61.435</td> </tr> <tr> <td>Education [(total costs not including teacher and non teacher labour costs + school transport + school building maintenance + food for children ÷ Number of Workers] ÷ 12 months</td> <td>74.284</td> <td>74.284</td> <td>74.284</td> </tr> <tr> <td>Creche Facilities (TPA) (building maintenance + food for children +supplies+ Caretaker costs) ÷ Number of Workers</td> <td>13.959</td> <td>13.959</td> <td>13.959</td> </tr> <tr> <td>Healthcare (Kesehatan) (maintenance of clinic, medicines & medical materials, ambulance transport costs + Cost of Healthcare Workers) ÷ Number of Workers</td> <td>465</td> <td>465</td> <td>465</td> </tr> <tr> <td>Transport</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Clothing</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Food</td> <td>261.027</td> <td>7.845</td> <td>120.567</td> </tr> <tr> <td>Sport & Recreation Fac.</td> <td>3.446</td> <td>3.446</td> <td>3.446</td> </tr> <tr> <td>Total Cost of In Kind Benefits</td> <td>676.973</td> <td>423.791</td> <td>536.512</td> </tr> <tr> <td>Average Monthly Take Home Salary per Worker</td> <td>3.080.309</td> <td>1.874.623</td> <td>2.587.593</td> </tr> <tr> <td>Total Value of Prevailing Wage</td> <td>3.757.282</td> <td>2.298.414</td> <td>3.124.105</td> </tr> </tbody> </table>	In Kind Benefits	SKU	PHL	Total Estate	Housing (Cost of Building :30 years)+(Annual Maintenance:Number of houses):12 Months	262.357	262.357	262.357	Electricity & Water (Annual Cost of Water & Electricity ÷ Number of Houses) ÷ 12 months	61.435	61.435	61.435	Education [(total costs not including teacher and non teacher labour costs + school transport + school building maintenance + food for children ÷ Number of Workers] ÷ 12 months	74.284	74.284	74.284	Creche Facilities (TPA) (building maintenance + food for children +supplies+ Caretaker costs) ÷ Number of Workers	13.959	13.959	13.959	Healthcare (Kesehatan) (maintenance of clinic, medicines & medical materials, ambulance transport costs + Cost of Healthcare Workers) ÷ Number of Workers	465	465	465	Transport				Clothing				Food	261.027	7.845	120.567	Sport & Recreation Fac.	3.446	3.446	3.446	Total Cost of In Kind Benefits	676.973	423.791	536.512	Average Monthly Take Home Salary per Worker	3.080.309	1.874.623	2.587.593	Total Value of Prevailing Wage	3.757.282	2.298.414	3.124.105	
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PROCEDURAL NOTE:

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

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

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

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

6.2.7	Permanent fulltime employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal	Based on document verification and interview with some employees, management unit used non-permanent/daily workers for the core work (92 harvester) and 12 mill operators in Buatan II POM. This is not	Non-compliance
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		<p>accordance with RSPO requirements related to permanent and full-time employment in palm oil plantation</p> <p><u>Simpang Perak Estate:</u></p> <table border="1"> <thead> <tr> <th>Status</th> <th>Number of Workers</th> <th>Percent</th> </tr> </thead> <tbody> <tr> <td>SKUH</td> <td>179</td> <td>28%</td> </tr> <tr> <td>SKUB</td> <td>34</td> <td>5%</td> </tr> <tr> <td>BHL</td> <td>428</td> <td>67%</td> </tr> <tr> <td>Total</td> <td>641</td> <td>100%</td> </tr> </tbody> </table> <p><u>Buatan II POM:</u></p> <table border="1"> <thead> <tr> <th>Status</th> <th>Number of Workers</th> <th>Percent</th> </tr> </thead> <tbody> <tr> <td>SKUH</td> <td>46</td> <td>52%</td> </tr> <tr> <td>SKUB</td> <td>35</td> <td>40%</td> </tr> <tr> <td>BHL</td> <td>7</td> <td>8%</td> </tr> <tr> <td>Total</td> <td>88</td> <td>100%</td> </tr> </tbody> </table> <p>The company has identified that it is related to the main work in oil palm plantations based on Circular Letter from GAPKI dated 073/GAPKI/II/2013 concerning Circular for the Flow of Work Implementation Process Activities in the Oil Palm Plantation Business Sector, stating that; only 2</p>	Status	Number of Workers	Percent	SKUH	179	28%	SKUB	34	5%	BHL	428	67%	Total	641	100%	Status	Number of Workers	Percent	SKUH	46	52%	SKUB	35	40%	BHL	7	8%	Total	88	100%	
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		<p>(two) jobs that are the main activities in the Oil Palm Plantation industry, namely harvesting and product processing activities, the rest are supporting activities in accordance with Permenakertrans No. 19/2012 whose implementation can be left to other parties.</p> <p>Based on the employees master for the period December 2020, PT IIS still has temporary workers (Daily: PHL and PKWT) who do the main work, namely:</p> <p><u>Simpang Perak Estate:</u></p> <p>Based on employee’s master of Simpang Perak Estate period December 2020 verification obtained information as follows:</p> <ul style="list-style-type: none"> - Harvester from period 2010-2015: 12 harvesters - Harvester from period 2016-2019: 57 harvesters - Addition of harvester in 2020: 23 harvesters <p>So, total of harvester wit the status of daily /temporary works as much as: 92 harvesters</p> <p>There was only one Promotion of PHL (Daily workers) to SKU (permanent workers) in 2021 on behalf of harvester Radot Butar Butar (refer to memorandum No. 004/HR-RO2/MEMO/SK/01/2021 dated 30 January 2021).</p> <p><u>Buatan 2 POM:</u></p> <p>There is a record of mill operator as per December 2020:</p> <ul style="list-style-type: none"> - Worker from period 2011-2015: 6 workers - Worker from period 2016-2020: 6 workers <p>So, the total of employess in processing with status of daily /temporary worker in Buatan 2 POM as much as 12 workers.</p>	
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		<p>Non conformity</p> <p>Based on document verification and interview with some employees, management unit used non-permanent/daily workers for the core work (92 harvester) and 12 mill operators in Buatan II POM. This is not accordance with RSPO requirements related to permanent and full-time employment in palm oil plantation.</p> <p>Objective evidence:</p> <p>Management unit has identified the core work in oil palm plantations Based on Circular Letter from GAPKI No. 073/GAPKI/II/2013 dated 8 February 2013 concerning Circular for the Flow of Work Implementation Process Activities in the Oil Palm Plantation Business Sector, stating that; only 2 (two) jobs that are the main activities in the Oil Palm Plantation industry, namely harvesting and product processing activities.</p> <p>Based on employee’s master of Simpang Perak Estate period December 2020 verification obtained information as follows:</p> <ul style="list-style-type: none"> • Harvester from period 2010-2015: 12 harvesters • Harvester from period 2016-2019: 57 harvesters • Addition of harvester in 2020: 23 harvesters <p>Total: 92 harvesters</p> <p>There was only one Promotion of PHL (Daily workers) to SKU (permanent workers) in 2021 on behalf of harvester Radot Butar Butar (refer to memorandum No. 004/HR-RO2/MEMO/SK/01/2021 dated 30 January 2021).</p> <p>At Buatan 2 POM, there is a record of mill operator as per December 2020:</p> <ul style="list-style-type: none"> • Worker from period 2011-2015: 6 workers • Worker from period 2016-2020: 6 workers 	
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		Total: 12 workers	
<p>Criteria 6.3: The unit of certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			
6.3.1	<p>(C) A published statement recognizing freedom of association and right to collective bargaining in national languages is available and is explained to all workers in languages that they understand, and is demonstrably implemented.</p>	<p>Buatan II POM and Estate: Freedom of association policy, dated 01 Desember 2019, written in Bahasa Indonesia, this policy has been informed to all employees and being placed into public area easily accessed. The freedom to gather and form associations is listed in the Company Policy in point 16: ... The company respects the rights of every employee to form or become a member of a trade union according to his wishes and to bargain collectively.”</p> <p>This policy is made in Indonesian, so that all workers can understand it. The socialization of this policy was carried out to all workers at PT IIS - Buatan II Group on September 24, 2019 which was attended by 29 workers and also on June 16, 2020 which was attended by 44 workers, attendance can be shown during the audit.</p> <p>PT Inti Indosawit Subur – Buatan Group has established a Labor Union and has been registered on Pelalawan Regency registered by Dirjen Pembinaan Hubungan Industrial dan Jaminan Sosial Tenaga Kerja No. Kep.88/PHIJSK-PKKAD/PKB/VI/2015, dated 18th June 2015.</p> <p>Scheme Smallholder: Manager of Kebun Plasma Buatan has established the ICS Policy under “Kebijakan Group Manager” dated 14 February 2020, that was signed by Manajer of Kebun Plasma Buatan, in point 9 was mentioned “<i>Menghormati HAM, serta keterwakilan tanpa memandang suku, kasta, asal negara, agama/kepercayaan, cacat, jender, orientasi seksual,</i></p>	Complied

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		<p><i>keanggotaan serikat pekerja, afiliasi politik dan atau umur</i>” – to treat all member of cooperative in fair manner, and respect human rights, and representative without any discrimination on tribe, race, caste, country of origin, religion/belief, disability, gender, sexual orientation, union affiliation, political affiliation or age.</p> <p>This policy has been socialized by the KUD/Cooperative each to all members, partners and surrounding communities, i.e In Sumber Rezeki Cooperative on 16 February 2020 which was attended by 20 participants. At the Bhirawa Bhakti Cooperative on 14 February 2020 which was attended by 21 participants.</p> <p>The policy is also written in their farmer handbook “Buku Panduan Petani”. The implementation of said policy in form of dissemination of anti-corruption policy, transparency in expenditure for road maintenance, fair calculation of worker payment, good quality FFB.</p>	
6.3.2	<p>Minutes of meetings between the unit of certification with trade unions or worker representatives who are freely elected, are documented in the national languages and available upon request.</p>	<p>Buatan II POM and Estate:</p> <p>The union labor has 242 members consisting of employees of Buatan II POM and Simpang Perak Estate. Based on an interview with the chairman of the Pabrik Buatan II Mill (Mr. Siswanto) that in terms of establishing the organizational structure of the management of PT IIS - Made by the Group does not interfere and influence. Trade unions can freely recruit members and as a sign of membership, trade unions also provide membership cards.</p> <p>The Union Labor meeting with management on 2020 period, including:</p> <ol style="list-style-type: none"> 1. The meeting between SPSI and the Management of PT IIS on August 27, 2019, there were several discussions, related: delivery 	Complied

		<p>of production targets and the preparation of labor needed and socialization to employees regarding awareness of the use of PPE</p> <ol style="list-style-type: none"> 2. Minutes of the meeting for the meeting on October 9, 2020, a meeting to discuss related: <ul style="list-style-type: none"> - Payment of pruning wages - Providing work / harvest tools (fiber, egrek etc.) - Wages and transport premiums are empty 3. Minutes of the meeting for the meeting on 23 September 2020, a meeting to discuss related: delivery of productivities of harvester and mandatory for PPE wearing to all workers. 4. Meeting with the management Ukui 1 Estate on 23 August 2020, discussed associated with the submission of the target production and lack of labor, liabilities use of personal protection for the entire employees. Harvesters. 	
6.3.3	<p>Management does not interfere with the formation or operation of registered labour organizations/unions, or other freely elected representatives for all workers, including migrant and contract workers.</p>	<p>Buatan II POM and Estate: PT Inti Indosawit Subur – Buatan Group has company policy signed by Managing Director on 01/12/2014. The policy stated company guarantee freedom of association or be part of worker union as well as collective bargaining.</p> <p>The union labor has 242 members consisting of employees of Buatan II POM and Simpang Perak Estate. Based on an interview with the chairman of the Pabrik Buatan II Mill (Mr. Siswanto) that in terms of establishing the organizational structure of the management of PT IIS - Made by the Group does not interfere and influence. Trade unions can freely recruit members and as a sign of membership, trade unions also provide membership cards.</p>	Complied

Criteria 6.4: Children are not employed or exploited.		
6.4.1	<p>A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.</p>	<p>Buatan II POM and Estate:</p> <p>PT Inti Indosawit Subur has established Company Policy dated 1 December 2019, that stated there is not allowed all children to work in every activities/processes in company. This policy has been socialization to all worker and contractor on 17-21 February 2020. It stated on Company policy on point 14; "Prohibit children from working in any company activities".</p> <p>Certificate holders - PT IIS – Buatan Group, also put in place a policy related to the prohibition of child labor (under 18 years), on the document of the FFB Supplier Statement and Guarantee in point 12; "Do not employ children (under 18 years) which as prohibited by Law no. 13/2003.</p> <p>Data seen:</p> <ul style="list-style-type: none"> - Employee register of Buatan II – Simpang Perak Estate, December 2020 period. There were 171 workers, the youngest worker namely Abdi Saptono date of birth 25 December 1991 and joint on 5 Januari 2011 (18 years and 9 months). - Employee register of Buatan II – Simpang Perak Estate, December 2020 period. There were 171 workers in operation, the youngest worker namely Lamria BR. Sianturi date of birth 5 August 1992 and joint on 1 January 2011 (18 years and 9 months). - Employee register of Buatan II POM, December 2020 period. There were 97 workers in operation, the youngest worker namely Piter Silitonga date of birth 12 June 1999 and joint on 1 November 2017 (21 years and 5 months). - FFB Supplier Statement and Guarantee, on behalf of supplier Mr. Ilham dated 1 August 2019. - FFB Supplier Statement and Guarantee, on behalf of supplier Mr.

Complied

		<p>Parlaungan Panjaitan CV Maju Bersama, on 18 February 2019.</p> <p>Scheme Smallholder: Plasma Buatan II have established policies related to the prohibition of employing children (under 18 years old). Samples taken for the Buatan Jaya and KUD KEbun Sawit Harapan Cooperative Policy dated 14 February 2020, explained in point 10; It is forbidden to employ children under the age of 18 in every plantation operational activity". This policy was disseminated to all members on 14 February 2020.</p> <p>Based on document review (list of employees) of Cooperative Buatan Jaya and Kebun Sawit Harapan Cooperative, there were found that a minimum age are met (the youngest of harvester born year 1996 – based on ID verification).</p>	
<p>6.4.2</p>	<p>(C) Documented evidence on the fulfilment of worker’s minimum age requirements in accordance with applicable regulation and verification procedures for age requirements, are available.</p>	<p>Buatan II POM and Estate: PT Inti Indosawit Subur has established Company Policy dated 1 December 2019, which stated there is not allowed all children to work in every activities/processes in company. This policy has been socialization to all worker and contractor on 17-21 February 2020. It stated on Company policy on point 14; "Prohibit children from working in any company activities".</p> <p>Certificate holders - PT IIS – Buatan Group, also put in place a policy related to the prohibition of child labor (under 18 years), on the document of the FFB Supplier Statement and Guarantee in point 12; "Do not employ children (under 18 years) which as prohibited by Law no. 13/2003.</p>	<p>Complied</p>

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6.4.3	<p>(C) Young person maybe employed only for non-hazardous work with protective restrictions in place for that work.</p>	<p>Buatan II POM and Estate:</p> <p>There is no young person under 18th years old employ in PT Indo Sawit Subur – Buatan II POM and Simpang Perak Estate.</p> <p>Based on document verification of list employe Buatan II POM and Simpang Perak Estate confirmed that there is no workers under age of 18 years old; the youngest workers birthday were 1996 and 1997 or 24/25 years old.</p> <p>Data seen:</p> <ul style="list-style-type: none"> - Employee register of Buatan II – Simpang Perak Estate, December 2020 period. There were 171 workers, the youngest worker namely Abdi Saptono date of birth 25 December 1991 and joint on 5 Januari 2011 (18 years and 9 months). - Employee register of Buatan II – Simpang Perak Estate, December 2020 period. There were 171 workers in operation, the youngest worker namely Lamria BR. Sianturi date of birth 5 August 1992 and joint on 1 January 2011 (18 years and 9 months). - Employee register of Buatan II POM, December 2020 period. There were 97 workers in operation, the youngest worker namely Piter Silitonga date of birth 12 June 1999 and joint on 1 November 2017 (21 years and 5 months). - FFB Supplier Statement and Guarantee, on behalf of supplier Mr. Ilham dated 1 August 2019. <p>FFB Supplier Statement and Guarantee, on behalf of supplier Mr. Parlaungan Panjaitan CV Maju Bersama, on 18 February 2019.</p> <p>Scheme Smallholder:</p> <p>Plasma Buatan II have established policies related to the prohibition of employing children (under 18 years old). Samples taken for the Buatan</p>	Complied

		<p>Jaya and KUD Kebun Sawit Harapan Cooperative Policy dated 14 February 2020, explained in point 10; It is forbidden to employ children under the age of 18 in every plantation operational activity". This policy was disseminated to all members on 14 February 2020.</p> <p>Based on document review (list of employees) of Cooperative Buatan Jaya and Kebun Sawit Harapan Cooperative, there were found that a minimum age are met (the youngest of harvester born year 1996 – based on ID verification).</p>	
6.4.4	<p>The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.</p>	<p>Buatan II POM and Estate:</p> <p>A formal policy for the protection of children, including prohibition of child labour and remediation are available in "Kebijakan Perusahaan" signed by Managing Director on 1st December 2019. In the policy stated that Company are prohibited to employ the child in the company operation. Child employee are under age 18th years old according to UU No. 13 Tahun 2003.</p> <p>The policy are included in the service contract and supplier agreement, sample seen:</p> <ul style="list-style-type: none"> - Agreement contract with CPO/PK transporter Pengangkutan Buana Jaya Bersama "Perjanjian Pengangkutan Nomor: 02/X/SKJ-ISJ/2019" dated 1st October 2019; Agreement with Jasa Bersama. On that contract is describes at Article 7 point e. "<i>Tidak mempekerjakan anak dibawah umur yang dilarang oleh peraturan perundangan ketenagakerjaan yang berlaku</i>" - Agreement contract with PT Buana Putra Jaya Lestari No. 01/SPJ/LEG-ISJ/III/19 dated 16 March 2019 – 30 March 2019, Scope of work: housing building. Annex 1 No. 7 "Menjamin bahwa tenaga kerja pihak ke dua bukan pekerja anak yang dilarang oleh Undang-undang ketenagakerjaan". 	Complied

		<ul style="list-style-type: none"> - FFB supplier cooperation contract on behalf of CV Maju Bersama and also on behalf of Ilham and signed the TBS Supplier Statement and guarantee dated February 18, 2019, stated at point 12; does not employ minors (<18 years) as prohibited by law number 13 of 2003. 	
Criteria 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	<p>(C) A policy to prevent sexual and all other form of harassment and violence is documented, implemented and communicated to all levels of the workforce.</p>	<p>Buatan II POM and Estate: PT Inti Indosawit Subur – Buatan II Group has established a policy to prevent sexual and all other forms of harassment and violence as in “Kebijakan Perusahaan” that was signed by Managing Director dated 1st December 2019, in point 15; “To prevent any sexual or physical abuses happen to women as well as to protect their reproductive rights”. The socialization of this policy was carried out to all workers at PT IIS - Buatan II Group on September 24, 2019 which was attended by 29 workers and also on June 16, 2020 which was attended by 44 workers, attendance can be shown during the audit. Data seen:</p> <ul style="list-style-type: none"> • Record of refreshment communication the company policy dated 17-21 February 2020 attended by 200 workers. • The policy is prominent displayed on notice boards at the Mills and the Estates areas. <p>Scheme smallholder: Manager of Kebun Plasma Buatan has established the Policy under “Kebijakan Group Manager” dated 2nd January 2018, that was signed by Manajer of Plasma Buatan, point 6 stated “Mencegah pelecehan seksual dan berbagai bentuk kekerasan terhadap perempuan”. In each cooperative or KUD has also established a Cooperative policy, related to sexual harassment and violence explained in point 11;</p>	Complied

		<p>"Preventing sexual harassment and various forms of violence against women and protecting their reproduction rights, i.e: Kebun Sawit Harapan and Buatan Jaya Cooperative Policy has been established on 14 February 2020 and was communicated to all members on 14 February 2020.</p>	
<p>6.5.2</p>	<p>(C) A policy to protect the reproductive rights of all, especially of women, is documented, implemented and communicated to all levels of the workforce.</p>	<p>Buatan I POM and Estate: PT Inti Indosawit Subur – Buatan II POM has established a policy, related to protect the reproductive rights “Kebijakan Perusahaan” that was signed by Managing Director dated 1st December 2019, in point 15; “To prevent any sexual or physical abuses happen to women as well as to protect their reproductive rights”. This policy has been socialization/dissemination to all employees in work place on 17-21 February 2020.</p> <p>Based on the PKB: Collective Labor Agreement for the period 2018 - 2020, the company has granted rights to female workers related to the protection of their reproductive rights, in the PKB Article IV document; Working hours at point 6: Entrepreneurs are prohibited from associating with pregnant women who according to doctors for the health and safety of their wombs and themselves, they work between 23.00 and 07.00 “. Based on Internal Memorandum No. 325/EST/MEMO/ 01/2020, dated January 6, 2020 from the Artificial Group Manager, related: "Policy regarding doctor's recommendation for female workers who are menstruating experiencing pain not to have to work on the first and second day of menstruation".</p> <p>Programmatically once a month, the company checks the pregnancy of female workers. 6 Female workers who work as herbicide and pesticide</p>	<p>Complied</p>

		<p>(chemical) sprayers, finally checking the skills of female workers on May 2, 2020</p> <p>Scheme smallholder: Manager of Kebun Plasma Buatan has established the Policy under "Kebijakan Group Manager" dated 2nd January 2018, that was signed by Manajer of Plasma Buatan, point 6 stated "Mencegah pelecehan seksual dan berbagai bentuk kekerasan terhadap perempuan".</p> <p>In each cooperative or KUD has also established a Cooperative policy, related to sexual harassment and violence explained in point 11 and 12; 11) "Preventing sexual harassment and various forms of violence against women and protecting their reproduction rights and 12) Give leave rights for female workers who are pregnant, i.e: Bhirawa Bhakti and Mulus Rahayu Cooperative Policy has been established on 14 February 2020 and was communicated to all members on 14 February 2020.</p>	
6.5.3	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified in accordance with applicable regulations in Indonesia.</p>	<p>Management has conducted a survey and consultation to 40 female workers with a method of interviewing directly in January 2020 to identify the needs for female workers who have children / infants under 5 years and are still breastfeeding. From the results of the survey and consultation, management issued several policies, including:</p> <ul style="list-style-type: none"> - Policy for employees who are breastfeeding, based on the Memorandum from the Farm Manager No. 171/ES-IIS/MEMO/01/20 dated January 4, 2020, stated: the company guarantees female employees to breastfeed their children during working hours, by giving time and place to all female employees who have babies to breastfeed their children once for 45 minutes: morning at 10.00-10.45 WIB at the clinic or afdeling office or 11.30 - 12.15 WIB. 	Complied

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		<ul style="list-style-type: none"> - Periodic checkups at the clinic to monitor the health of the baby by providing POSYANDU services once a month at the Central TPA (Child Care Center) including immunization and vitamins. - The company has provided menstrual leave for female employee in accordance with the recommendation from paramedic in clinic, and this is in line with "Perjanjian Kerja Bersama" and applicable regulations. - The company has granted the right for maternity leave the women who gave birth in accordance with the applicable rules and "Perjanjian Kerja Bersama". - The company has consistently performed pregnancy tests to women workers who worked as a fertilizer and spraying every 1 month. - The company has a policy of not hiring female labor during pregnancy or breast-feeding for the kind of work that endanger such as fertilizer or spraying by temporarily moving the work force to other types of work. 	
6.5.4	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, as long as the complaint is supported with adequate information, is documented, implemented and communicated to all levels of the workforce.</p>	<p>The company has had the procedure related to complain in document Standard Operating Procedure, No. SOP: XX-HR-308.5-RO; Revision: 0, December 11th 2009: Employees complaints: submission and settlement. Mechanism for complaints management where it needs to protect its confidentiality for complaint submitter was found in company policy's draft as in one of points of this policies stated that:</p> <p><i>"To provide appropriate information for those who inquiry it and to protect its confidentiality for whistle blower cases in accordance to law regarding environmental and social issue, food safety, health and safety work, so that it enables them to more participate to the decision making processes for improving company's performance".</i></p>	Complied

		<p>Policies that have been made by companies related to the protection of women's rights such as;</p> <ol style="list-style-type: none"> a. The company has provided menstrual leave for female employee in accordance with the recommendation from paramedic in clinic, and this is in line with "Perjanjian Kerja Bersama" and applicable regulations. b. The company has granted the right for maternity leave the women who gave birth in accordance with the applicable rules and "Perjanjian Kerja Bersama". c. The company has consistently performed pregnancy tests to women workers who worked as a fertilizer and spraying every 1 month. d. The company has a policy of not hiring female labor during pregnancy or breast-feeding for the kind of work that endanger such as fertilizer or spraying by temporarily moving the work force to other types of work. e. The company has consistently performed regular health checks for sprayers every six months. <p>The company has conducted training and socialization prevention of sexual harassment in the workplace to the Committee members for example gender socialization on 23 marh 2020, on "<i>Sosialiasi Pelecehan Seksual dan Kebijakan Hak Reproduksi</i>", was attended by 14 participants of Buatan II and Simpang Perak Estate, while at the Pangkatan Estate has socialization on 20 January 2021 and attended by 25 participants.</p> <p>On 2020 Period, Gender Committee Work Program has been established including the issues that will be discussed at the meeting, including:</p> <ul style="list-style-type: none"> - Defending and guaranteeing the rights of women workers 	
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		<ul style="list-style-type: none"> - Carry out routine immunization of children to mothers who have toddlers - Conduct family health education with environmental cleanliness <p>Realization of Gender committee programe on 2021, such as:</p> <p>On February 23 March 2020; socialization to female workers related to the protection of women, children workers and sexual harassment at Simpang Perak Estate and Buatan II POM was attended by as many as 12 women workers. Socialization to female workers related to the sexual harassment policy on 21 January 2021 was attended by 25 participants.</p> <p>Based on the records of the routine meeting and interviews with management, that during the period 2019-2020 there were no cases related to women workers.</p>	
Criteria 6.6: No forms of forced or trafficked labour are used.			
6.6.1	<p>(C) All work is voluntary and the following are prohibited:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports; • Payment of recruitment fees; • Contract substitution without worker’s consent • Involuntary overtime; • Lack of freedom of workers to resign • Penalty for termination of employment, unless the unit of certification and the workers agree to the penalty and it is stated in the employment agreement • Debt bondage • Withholding of wages 	<p>Buatan II POM and Estate:</p> <p>Based on document list of employees verification, there was no indication of forced labour, contract substitution and/or human trafficking. All employees have had work agreement, regulating the rights and obligation of company and employee. The work agreement including working hour and salary payment.</p> <p>Based on the overtime warrant, it has been verified that there are no indications of an overtime order being forced, overtime is carried out on the approved order. There is no indication that there are workers who work due to debt bondage, nor are there any fees at the time of employee recruitment. All workers have been determined based on the agreed work contract, if there is a worker who will decide to stop working before the contract period ends, the company will conduct</p>	Complied

		<p>counseling / interview with the employee concerned and the decision taken is based on an agreement between the two parties.</p> <p>Based on document verification and salary payment, shows employee have paid in accordance to minimum wage regulation, as well as verification to the master list of employees May 2020 period, that there is no use of migrant/foreign/honorary worker.</p> <p>All employee including temporary workers have work agreement; regulating the scope of work, work agreement timeframe, working hour, salary payment, overtime and Jamsostek. Based on verification of master list of employees May 2020 period, there were no indication of contract substitution occurred. All employees have work agreement, explaining the rights and obligation including scope of work.</p> <p>Scheme Smallholders:</p> <p>Similar to estate and mill, there is no forced and trafficked labour has noted during assessment.</p> <p>KUD has a policy related to use of migrant worker inside "Kebijakan Koperasi". Based on document verification, there were no migrant worker used in cooperative.</p> <p>All worker in cooperative have work agreement. All of them already appointed as permanent worker.</p>	
6.6.2	<p>(C) Where temporary (Specified Time Work Agreement/PKWT) or migrant workers are employed, a specific labour policy and procedures are established and evidence of implementation is available.</p>	<p>Buatan I POM, Estate and Scheme Smallholder:</p> <p>PT Inti Indosawit Subur – Buatan Group uses temporary workers as BHL in Buatan I Estate, Plasma and Buatan II Mill operations. Based on</p>	Complied

		<p>employee list period May 2020, there are 268 workers in Buatan II Estate, 3 workers in Plasma Buatan II and 19 workers in Buatan II Mill.</p> <p>The company has a procedure regarding SOP New Employee Reception No. AA-HR-305.2-R0 dated 1 February 2009, this procedure is a general acceptance of employees (for all employees), but there are no specific procedures and policies regarding BHL or PKWT workers according to the RSPO P&C requirements.</p> <p>PT Inti Indosawit Subur – Buatan II Group uses temporary workers as BHL in Simpang Perak Estate and Buatan II Mill operations. Based on employee list period June 2020, there are 411 workers in Simpang Perak Estate and 13 workers in Buatan II Mill.</p> <p>The company has a procedure regarding SOP New Employee Reception No. AA-HR-305.2-R0 dated 1 February 2009, this procedure is a general acceptance of employees (for all employees), but there are no specific procedures and policies regarding BHL or PKWT workers according to the RSPO P&C requirements.</p> <p>PT Inti Indosawit Subur – Buatan II POM and Estate has issued the specific labour policy and procedures for temporary workers (PHL/PKWT); The policy and procedure are issued for each unit as Simpang Perak Estate and POM: Memorandum No. 94/ES-KSP/MEMO/08/2020, dated 10 August 2020.</p> <p>The policy and procedure has been communicated to workers, especially to temporary workers at Buatan II POM and Simpang Perak Estate on 11 August 2020. The procedure was explain the detail of mechanism for temporary workers recruitment, promotion of temporary workers to be permanent workers, term and condition and requirement of temporary workers in accordance with National regulation (UU No. 13 tahun 2003).</p>	
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Criteria 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.

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6.7.1	<p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p>	<p>PT Inti Indosawit Subur – Buatan II POM has appointed a person who responsible on OHS implementation and monitoring. The safety committee has defined in all estate and POM under P2K3 (Panitia Pembina Keselamatan dan Kesehatan Kerja).</p> <p>Sample seen:</p> <ul style="list-style-type: none"> – Safety committee has defined under “Surat Keputusan Kepala Dinas Tenaga Kerja dan Transmigrasi Propinsi Riau nomor Kep.13/Disnakertrans-PK/SK-P2K3/II/2020 tentang Pengesahan Panitia Pembina Keselamatan dan Kesehatan Kerja (P2K3) PT Inti Indosawit Subur – Kebun Buatan, updated on 6th February 2020 – The company has also assigned the person who responsible on OHS expert (AK3- Umum), namely Mr Sh*d**n with license number: No.Reg 73238PK3/AJ/14/2019/P0 dated 9th September 2019 valid until 3 years. – Record of monthly meeting (P2K3), sample seen: MoM on 15 February 2021, agenda meeting: review on previous OHS meeting, review of inspection of PPE usage, review on accidents report. – Three months report on OHS performance for period October - December 2020 was sent to Manpower Agency in Pelalawan Regency. <p><u>Scheme smallholders:</u> Each KUD has established a team who has been responsible on implementation and implementation the OHS program. Based on interview during onsite audit, there was confirmed that smallholder’s cooperative has established a team who has been responsible on implementation of OHS.</p>	Complied
6.7.2	<p>Accident and emergency procedures in Indonesian language are in place and clearly understood by all workers. Assigned operatives trained in first aid are present in both field and other operations. First aid equipment is</p>	<p>PT Inti Indosawit Subur – Buatan II POM has defined the procedure for emergency response under Standar Operatonal Procedure – Environmental Field Procedure, such as:</p>	Complied

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	<p>available at worksites. Records of all accidents are kept and periodically reviewed.</p>	<ul style="list-style-type: none"> - Nomor AA-KL-11-EFP tentang Penangan Tumpahan di Laboratorium - Nomor AA-KL-14-EFP tentang Pengendalian Kebakaran Lahan - Nomor AA-KL-16-EFP tentang Pengendalian Tumpahan B3 dan Limbah B3 - Nomor AA-KL-17-EFP tentang Pengendalian Ledakan Boiler, Tabung Gas dan Lainnya - Nomor AA-KL-18-EFP tentang Pengendalian Gempa Bumi, Banjir dan Tanah Longsor - Nomor AA-KL-19-EFP tentang Tanggap Darurat Kabut Asap <p>PT Inti Indosawit Subur – Buatan II POM has also prepared the procedure on work accident under "Standard Operasioanl Prosedur – Investigasi Kecelakaan Kerja nomor AA-SMK3-18001.02-R0", revision 0 dated 1st April 2018.</p> <p>Data verified:</p> <ul style="list-style-type: none"> - The company has also appointed the person who has attended first aid training, namely Ms M8rs8n8i (license number on first aider 566/DTKT-WAS/LC/P3K/100 - Emergency response team has defined as in "Struktur Organisasi Tanggap Darurat" year 2020. - List of first aid kit (include portable first aid) as in "List Kebutuhan Obat-Obatan P3K updated in February 2021 	
<p>6.7.3</p>	<p>(C) Workers use appropriate personal protective equipment (PPE) which is provided free of charge to all workers in the workplace, to cover all potentially hazardous operations, such as pesticides application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p>	<p>PT Inti Indosawit Subur – Buatan II POM has demonstrated the record of realization the OHS program 2020 including use appropriate personal protective equipment (PPE) which is provided free of charge to all workers in the workplace, to cover all potentially hazardous operations, such as pesticides application, machine operations, land preparation, and harvesting, such as:</p> <ul style="list-style-type: none"> - Report of MCU for all workers in Buatan II mill, was conducted by "Klinik Asian Agri Sehat Buatan", dated 10 December 2020 was 	<p>Complied</p>

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		<p>attended by 52 workers. The MCU was covered urine test, HSaAg and fysical test.</p> <ul style="list-style-type: none"> - Monitoring of emergency response and peparedeness facilities, i.e: fire hydrant (7 units) and fire extinguisher (26 units), updated in March 2021, location in Buatan II POM. - Refreshment of socialization the company's policies, conducted in 6th January 2021 – location in Buatan II POM was attended by 34 workers - Report of OHS inspection report, location in Buatan II POM dated 14^d January 2021 – reported OK for PPE usage, and OHS facilities (fire hydrant and . - Record of handover of PPE, location in KUD Bhirawa Bhakti and Sawit Harapan dated 18th September 2020; PPE: herlmet, safety glasses. - "Checklist on monitoring of PPE use for harvester KUD Bhirawa Bhakti and Sawit Harapan dated 17th January 2021. Reported Ok for safety helmet, AP boot, safety glasses, chisel cover. <p>Based on field visit in Kavling in KUD Bhirawa Bhakti ; there was found the harvester has used in PPE as required in HIRADC.</p>	
6.7.4	<p>All workers are provided medical care and covered by accident insurance. Costs incurred from work related incidents, leading to injury or illness, are covered in accordance with applicable regulations or by the unit of certification if applicable regulations do not provide protection.</p>	<p>PT Inti Indosawit Subur – Buatan II POM has provided all normative rights for employee, such as salary as lined out in minimum wage for province level, leave entitlement, employees registered with social insurance for worker (BPJS), benefit for religious festival, provision of facilities (housing, electricity, clean water, medical clinic, school/school bus, worship house, personal protective equipment and working tools.</p> <p>PT Inti Indosawit Subur – Buatan II POM has provided regular medical check-up for workers in high risk such as sprayer team, fertilizer applicator, workshop worker and mill operators.</p> <p><u>Scheme smallholders:</u></p>	Complied

		<p>The government covers medical insurance for smallholders and it is optional. Based on interview with smallholders KUD Bhirawa Bhakti and KUD Sawit Harapan, most of farmers/smallholders has had insurance (BPJS Kesehatan Mandiri).</p> <p>Data verified: Evidence of payment period for BPJS TK and BPJS KS (medical insurance) month January 2021- payment code #190602336151. Status PAID</p>	
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	<p>PT Inti Indosawit Subur – Buatan II POM has been kept the recprd of occupational injuries using LTA metrics under “Data Laporan Kecelakaan Kerja” year 2020.</p> <p>Data seen:</p> <ul style="list-style-type: none"> – The occupational injuries reported 6 cases . Lost time injuries is 46 man-days – All the accident has carried out the inverstigation. The followed up on recommendation on result of investigation available as evidents. <p><u>Scheme Smallholders:</u> The record of injuries has shown under document of “Monitoring Kecelakan Kerja 2020”, since 2018 to 2020 there were no injuries cases (Nil). Sample of KUD are KUD Bhirawa Bhakti and Sawit Harapan</p>	Complied
<p>Principle 7: Protect the environment, conserve biodiversity and ensure sustainable management of natural resources.</p>			
<p>Criteria 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.</p>			
7.1.1	(C) IPM plans are implemented and monitored to ensure effective pest control.	<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</p>	Complied

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		<p>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 rotation can be delayed or reduced especially in mature or old palm where weeds/pest population are under control. 	
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		<ul style="list-style-type: none"> Minimalize contamination for pesticide applicator and their families by ensuring them to clean themselves before back home. <p>Onsite Audit: During the field visit in own estate (Simpang Perak Estate Block H15n Afdeling 1) and smallholder’s area (KUD Mulus Rahayu and Bhirawa Bakti), visually there was no issues related to the outbreak or infestation. However, there were a usage of natural predator (<i>Tyto alba</i>) to reduce a rat infestation.</p>	
7.1.2	Invasive species are not to be used according to applicable regulation in managed areas, unless plans to prevent and monitor their spread are implemented.	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 .	Complied
7.1.3	There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities.	Based on document verification, interview and field observation obtained information that there is no record use of fire for pest control.	Complied
Criteria 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.			
7.2.1	(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.	PT Inti Indosawit Subur – Buatan Group has had the procedure related to pesticide usage for chemical weeding and pest control (if needed). The 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).	Complied

		<p>Onsite Audit:</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>According to the national regulation, all pesticide used by the management unit has registered in agricultural ministry of Indonesia. It can be check in http://pestisida.id/simpes_app/index.php. The type of pesticide use by management unit during January 2020 – February 2021 and its weeds target are as follow:</p> <table border="1" data-bbox="1133 1169 1966 1310"> <thead> <tr> <th data-bbox="1133 1169 1272 1310">Agrochemical</th> <th data-bbox="1272 1169 1480 1310">Active ingredients</th> <th data-bbox="1480 1169 1704 1310">Register No.</th> <th data-bbox="1704 1169 1966 1310">Target</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Agrochemical	Active ingredients	Register No.	Target					
Agrochemical	Active ingredients	Register No.	Target								

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		Kenlon 480 EC	Trikolpir Bitoksi Etil Ester 480 g/l	RI.01030120062433 Valid until 31 Dec 2021	Wood
		Elang 480 SL	Isopropil Amina Glifosat 480 g/l	RI.01030119941170 Valid until 21 Dec 2021	Narrow leaf weed, <i>Asystasia</i> , <i>Imperata cylindrical</i>
		Kenrane 288 EC	Floroksipir 1-MHE: 288 g/l	RI.01010120103759 Valid until 20 Dec 2020	<i>Legume</i> , <i>Asystasia</i>
		Basta 150 SL	Amonium Glufosinat 150 g/l	RI.01030119921113 Valid until 22 Jan 2024	Wide leaf (<i>Ageratum conyzoides</i>); narrow leaf (<i>Axonophus compressus</i> , <i>Imperata cylindrical</i> , <i>Ischaemum timorense</i> , <i>Ottochloa nodosa</i> , <i>Setaria palmifolia</i>).
		Karmex 80 WP	Diuron 80%	RI.01030120113958	broadleaf weeds (<i>Borreria latifolia</i> , <i>Asystasia intrusa</i> , <i>Clidemia hirta</i> , <i>Mikania micrantha</i>) and narrow leaf weeds (<i>Imperata cylindrical</i> , <i>Cyperus rotundus</i> , <i>Cyclosorus aridus</i>)
		Metaprima	Metil melsulfuron	RI.01030120031897 Valid until 03 September 2023	Broadleaf weeds, <i>Ageratum conyzoides</i> , <i>Calopogonium mucunoides</i> , <i>Clidemia hirta</i> , <i>Synedrella nodiflora</i> .
		Rolidor 25EC	Lamda sihalotrin	RI.01010120031921 Valid until 03 September 2023	Spodoptera litura

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		<table border="1"> <tr> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Nordox 86WG</td> <td>Copper oxide</td> <td>RI. 01020119951188 Valid until 11 May 2021</td> <td>Leaf disease</td> </tr> <tr> <td>Gulmaron 80WP</td> <td>Diuron 80%</td> <td>RI. 01030119981413 Valid until 2 May 2022</td> <td>Broadleaf weeds, Synedrella nodiflora, Eleusine indica</td> </tr> </table>					Nordox 86WG	Copper oxide	RI. 01020119951188 Valid until 11 May 2021	Leaf disease	Gulmaron 80WP	Diuron 80%	RI. 01030119981413 Valid until 2 May 2022	Broadleaf weeds, Synedrella nodiflora, Eleusine indica	
Nordox 86WG	Copper oxide	RI. 01020119951188 Valid until 11 May 2021	Leaf disease												
Gulmaron 80WP	Diuron 80%	RI. 01030119981413 Valid until 2 May 2022	Broadleaf weeds, Synedrella nodiflora, Eleusine indica												
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, Buatan Estate has calculated the LD50 of each pesticide in a monthly bases.	Complied												
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 recertification 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>	Complied												
7.2.4	There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in Indonesia best practice guidelines.	There was some pesticide usage especially in nursery and immature area to prevent pest infestation. For example, there was a record of pesticide (active ingredients Lamda sihalotrin) to prevent <i>Spodoptera litura</i> infestation. This prophylactic usage has followed the national guidelines such as dosage, interval and infestation rate. Also, in accordance to Asian Agri's Research and Development guidelines.	Complied												

<p>7.2.5</p>	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat, are not to be used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to: 7.2.5a Judgment of the threat and verify why this is a major threat.</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>According to bin card in chemical store obtained information of pesticide list that usually used with active ingredients such as <i>isopropyl amine glyphosate, fluoroksifir, methyl metsulfuron, triklofir, diuron, paraquat diklorida, diuron, and lamda sihalotrin</i>. Certificate holder no longer using paraquat since 15 November 2019, according to the circular letter of Deputy Managing Director No. 008/DMD/MEMO/OCT/19 dated 22 October 2019.</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 herby system knapsack as example. • Conducted regularly training for pesticide applicator and equipped them with appropriate PPE's. 	<p>Complied</p>
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		<ul style="list-style-type: none"> • Delaying the pesticide if weed or pest is under control. According to the interview with estate manager obtain information that the pesticide rotation can be delayed or reduced especially in mature or old palm where weeds/pest population are under control. • Minimalize contamination for pesticide applicator and their families by ensuring them to clean themselves before back home. 	
	7.2.5b Why there is no other alternative which can be used.	Certificate holder has showed the record of LD50 calculation in each unit based on amount of pesticide used. For example, Simpang Perak Estate has calculated the LD50 of each pesticide in a monthly basis.	
	7.2.5c Which process was applied to verify why there is no other less hazardous alternative.	Until this recertification audit obtain information that there is no pesticide use for control pest attack. All of pesticide only using for weeding (herbicide). Based on interview with field assistant and smallholder representatives known that no outbreak that causes pesticide usage.	
	7.2.5d Process to limit the negative impacts of the application.	Based on document verification, interview and field observation obtained information that there is no record of negative impact related to the pesticide application.	
	7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.	Based on goods in and goods out data in pesticide store, obtained information that the certificate holder used some kind of pesticide (different active ingredients). There is only <i>paraquat diklorida</i> that listed as WHO Class II (Moderately Hazardous). As described in this indicator, the company no longer using <i>paraquat diklorida</i> since November 2019. There is no use of other pesticide class 1A and 1B until the audit.	

7.2.6	<p>(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they conduct.</p>	<p>Pesticides are always applied in accordance with the product label and storage instruction. Agrochemicals storage was locked in areas with limited access. The storage was ventilated. MSDS and hazard symbol label were provided nearby of agrochemicals. Emergency shower and eyewash were also provided to anticipate in case of an emergency of agrochemical handling. The possible spillage was managed. Secondary containment was provided around the chemical storage area. Spill kit was also provided in the area. Interview with spraying workers demonstrated that all of them have a good knowledge regarding pesticide usage and its material usage and toxicity. PPE for handling of chemicals were provided including boots, apron, safety glass, respiratory mask and hand gloves. PPE used was appropriate according to recommendations in any risk assessments. PPE provided and used can be easily replaced if damaged. All precautions attached to the products properly observed, applied, and understood by workers.</p> <p>Based on a field visit to the Pesticides Storage dated 2nd March 2021, there was found that:</p> <ul style="list-style-type: none"> - Permanent Buildings, - A good ventilation, - Permanent floor is cemented, the floor of the mixing of pesticides using ceramics, and equipped with a "spillage trap", - Eye wash shower, first aid box, PPE and Fire extinguisher are provided. - PPE room - Operation control: MSDS are available for all types of existing pesticides and the pesticide management and safety instructions are available - A package management/ used pesticide package is available 	Complied

		<ul style="list-style-type: none"> - Water wash of pesticides containers collected in "spillage trap" - The flow of waste water is channeled and stored so that it is not discharged into the environment. The water used is used for its dilution. <p>All waste products has been identified and documented under the "Evaluasi Aspek-Dampak Lingkungan" (Environmental Aspect impacts). Domestic waste is the main concern to be manage. Both Mill and Estate, has periodically schedule to manage the domestic waste.</p>	
7.2.7	(C) Storage of all pesticides in accordance with recognized best practices.	<p>All chemicals and empty containers collected and stored at permitted hazardous waste storage (Tempat Penyimpanan Sementara Limbah B3) location in Buatan II POM.</p> <p><u>Scheme smallholders:</u> Group manager Smallholder Buatan has a policy and mechanism to manage the waste from ex fertilizer sack according to procedure of "Pengelolaan Kemasan Ex (Bekas) Pupuk di Kebun No. 035/DOK/SOP/PT.IIS KLB-AA/2016" dated 2 December 2016. The ex fertilizer sack must be handled by triple rinse and use as loosefruit sack, the innerbag of fertilizer was delivered to collector.</p> <p>During field visit and interview with sample smallholder in KUD Bhirawa Bhakti and Sawit Harapan dated 10th March 2021, they were well aware of the to manage the waste from ex fertilizer sack and empty chemical.</p>	Complied
7.2.8	All pesticide containers that are disposed of and/or used for other purposes are managed according to applicable regulations and/or instructions on the packaging.	<p>Pesticides are always applied in accordance with the product label and storage instruction. Agrochemicals storage was locked in areas with limited access. The storage was ventilated. MSDS and hazard symbol label were provided nearby of agrochemicals. Emergency shower and eyewash were also provided to anticipate in case of an emergency of agrochemical handling. The possible spillage was managed. Secondary</p>	Complied

		<p>containment was provided around the chemical storage area. Spill kit was also provided in the area. Interview with spraying workers demonstrated that all of them have a good knowledge regarding pesticide usage and its material usage and toxicity. PPE for handling of chemicals were provided including boots, apron, safety glass, respiratory mask and hand gloves. PPE used was appropriate according to recommendations in any risk assessments. PPE provided and used can be easily replaced if damaged. All precautions attached to the products properly observed, applied, and understood by workers.</p> <p>Based on a field visit to the Pesticides Storage dated 2nd March 2021, there was found that:</p> <ul style="list-style-type: none"> - Permanent Buildings, - A good ventilation, - Permanent floor is cemented, the floor of the mixing of pesticides using ceramics, and equipped with a "spillage trap", - Eye wash shower, first aid box, PPE and Fire extinguisher are provided. - PPE room - Operation control: MSDS are available for all types of existing pesticides and the pesticide management and safety instructions are available - A package management/ used pesticide package is available - Water wash of pesticides containers collected in "spillage trap" - The flow of waste water is channeled and stored so that it is not discharged into the environment. The water used is used for its dilution. <p>All waste products has been identified and documented under the "Evaluasi Aspek-Dampak Lingkungan" (Environmental Aspect impacts).</p>	
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		Domestic waste is the main concern to be manage. Both Mill and Estate, has periodically schedule to manage the domestic waste.	
7.2.9	(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.	Upto onsite audit – 2021, there is no aerial application of pesticide throughout the company plantation and scheme smallholders	Complied
7.2.10	(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.	<p>Annual medical check-up was conducted for all workers handling with chemical, such as pesticide, herbicide and fertilizer.</p> <p>The latest medical check-up performed on 12th December 2020 at company medical healthcare “Klinik Asian Ari Sehat Buatan” and attended by 110 workers, consisted of fertilizer applicators, spraying applicator and PIC in pesticides storage.</p> <p>The result of MCU has communicated to all workers on 2 and 9 January 2021</p> <p><u>Scheme smallholders:</u> Medical check-up for smallholder’s pesticide operator are include with Estate, because those chemical/spraying operators are work at Estate and Smallholders area. Sample: in KUD Bhirawa Bhakti and Sawit Harapan</p>	Complied
7.2.11	(C) No pesticide-related work is carried out by pregnant or breastfeeding women, or people with medical limitations and they are offered other equivalent work alternatives.	<p>PT Inti Indosawit Subur – Buatan Group prohibits pregnant or breast-feeding women to perform chemical spraying. In order to mitigate, estate performed monthly pregnancy test.</p> <p>PT Inti Indosawit Subur – Buatan II POM has kept the record that spraying is not conducted by pregnant or breast-feeding women. The company has been conducting PP Test (pregnant test) every month.</p>	Complied

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		<p>The last of pregnancy test conducted on 4 October 2020, 8 November 2020 and 6 December 2020. All the female sprayer in well condition and not being pregnant nor breast feeding.</p>	
<p>Note For 7.2.11 Referring to Act No. 13 of 2003 concerning Manpower, Act No. 35 of 2014 concerning Child Protection, and taking into account the risks of hazards on palm oil plantations and mills on the development and physical, mental and social health of children, the national interpretation mandates that the unit of certifications does not employ people under the age of 18 for pesticide spraying. For this reason, the provisions of young workers under 18 years in indicator 7.2.11 are irrelevant.</p>			
<p>Criteria 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.</p>			
<p>7.3.1</p>	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented in accordance with applicable laws and regulations.</p>	<p>PT Inti Indosawit Subur – Buatan II POM and Estate collects all hazardous waste from estates and mill into temporary hazardous waste storage in central workshop compound.</p> <p>PT Inti Indosawit Subur – Buatan II POM has prepared a procedure to handle hazardous waste titled "Prosedur Penanganan Limbah B3" No.AA-KL-06-EFP explains methods to collecting the waste, recording in balance and disposal through licensed third party transporter</p> <p>PT Inti Indosawit Subur – Buatan II POM has been stored the hazardous waste in temporary storage with permit. The temporary hazardous waste storage has a valid permit based on "Surat Keputusan Badan Penanaman Modal dan Pelayanan Perijinan Terpadu nomor: KPTS.503/BPMP2T-PLY/14/2016, dated 18 March 2016, the license valid until 5 year 2021.The hazardous waste is sent to the registered collector/transporter which approved by Environmental Ministry, namely PT Indostar Cargo.</p> <p>A documented waste management plan to avoid or reduce pollution and its implementation shall available under document of Environmental</p>	<p>Complied</p>

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		<p>Aspect-Impacts (Evaluasi Aspek-Dampak Lingkungan) year 2020. The document covered all operation in mill, estate and its smallholders.</p>	
<p>7.3.2</p>	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p>	<p>PT Inti Indosawit Subur has a waste management plan, identifying type and source of waste and the disposal plan. PT Inti Indosawit Subur prepared a procedure to handle hazardous waste titled "Prosedur Penanganan Limbah B3" No.AA-KL-06-EFP explains methods to collecting the waste, recording in balance and disposal through licensed third party transporter.</p> <p>The company store hazardous waste in temporary storage with permit, The hazardous waste is sent to the registered collector/transporter which approved by Environmental Ministry, namely PT Indostar Cargo.</p> <p>Based on interview with workers who are handling of pesticides that they understood of disposed empty containers pesticides, such as: Empty chemical containers re-used only for mixing purposes, unusable are triple rinsed, punctured and disposed to the approval collector.</p> <p>However, the handling of hazardous waste is inconsistent with the procedure to handle hazardous waste titled "Prosedur Penanganan Limbah B3" No. AA-KL-06-EFP explains methods to collecting the waste, recording in balance and disposal through licensed third-party transporter.</p> <p>Based on a field visit at Buatan II POM (dated 5th March 2021), the auditor team found empty containers of hazardous material in the scrap yard (total 3 items), this was not in accordance with the procedure to handle hazardous waste titled "Prosedur Penanganan Limbah B3" No.AA-KL-06-EFP explains methods to collecting the waste, recording in</p>	<p>Non-compliance</p>

		balance and disposal through licensed third party transporter. This is raised as Noncompliance .	
7.3.3	The unit of certification does not use open fire for waste disposal.	<p>All waste products has been identified and documented under the "Evaluasi Aspek- Dampak Lingkungan" (Environmental Aspect impacts). Domestic waste is the main concern to be manage. Both Mill and Estate, has periodically schedule to manage the domestic waste. The document of "Jadwal Pengangkutan Sampah 2019 untuk Karyawan Buatan Estate, update 15 Jan 2019". Regulation of domestic waste management refer to "UU No. 18 Tahun 2008 tentang Pengelolaan Sampah".</p> <p>ICS Group Plasma Buatan has defined the procedure "Pengelolaan Kemasan Ex (Bekas) Pupuk di Kebun" No. 035/DOK/SOP/PT.IIS KLB-AA/2016 dated 2 December 2016. All ex fertilizer sack was prohibit to dispose in plantation and housing area. All the ex-fertilizer sack usage must be identified and reported to Group Manager ICS.</p>	Complied
Criteria 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	Good agricultural practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts is documented.	<p>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>Scheme Smallholder:</p> <p>Based on interview with smallholder representatives obtain information that they only using fertilizer according to the recommendation from</p>	Complied

		<p>Asian Agri’s Research and Development Department. No fertilizer applied in riparian area to minimize environmental impact.</p> <p>Onsite audit:</p> <p>During the audit known that the management unit has applied fertilizer according to the fertilizer’s recommendation issued by Asian Agri Research and Development Department. Based on field visit in Block H15n Afdeling 1 using Ammniun Chloride with dosage 2.5 kg/palm (this is in accordance with fertilizer’s recommendation 2021).</p> <p>In addition, management unit also applied POME application especially in early mature area to maintain soil fertility and increase production. The POME applied with dosage 800 m3/Ha/year.</p> <p>Based on interview with smallholders, most of their plots is no longer applied with fertilizer due to in replanting preparation in 2023 – 2023.</p>	
7.4.2	<p>Analysis of tissue samples (e.g. leaves) and soil on a regular basis to monitor and manage changes in soil fertility and plant health is documented.</p>	<p>According to the Asian Agri’s agricultural policy, soil sampling conducted every 5 years while leaf sampling conducted annually. Based on document verification sighted the report of soil and leaf sampling in own estate and smallholders as follows:</p> <ul style="list-style-type: none"> • The last soil sampling conducted on August 2018. Parameter that tested is N, C, K, Ca, Mg and pH. • The last leaf sampling conducted on April 2020. Parameter that tested is major element (Ash, N, P, K Mg, Ca) dan Minor element (B, Cu, Zn, Mn, Fe). 	Complied

		<p>Those reports are converted to be fertilizer recommendation by Asian Agri's Research and Development Department.</p>	
<p>7.4.3</p>	<p>A nutrient recycling strategy is in place, which include the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.</p>	<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 in Simpang Perak/Buatan Estate.</p> <p>Scheme Smallholder:</p> <p>According to the interview with smallholder representatives, currently there is no longer EFB application since their area has planned to be replanting.</p> <p>Onsite audit:</p> <p>During the audit known that the management unit has applied fertilizer according to the fertilizer's recommendation issued by Asian Agri Research and Development Department. Based on field visit in Block H15n Afdeling 1 using Ammonium Chloride with dosage 2.5 kg/palm (this is in accordance with fertilizer's recommendation 2021).</p> <p>In addition, management unit also applied POME application especially in early mature area to maintain soil fertility and increase production. The POME applied with dosage 800 m3/Ha/year.</p>	<p>Complied</p>

		Based on interview with smallholders, most of their plots is no longer applied with fertilizer due to in replanting preparation in 2023 – 2023	
7.4.4	Records of fertilizer inputs are maintained.	Record of fertilizer application in estate are in places. For example, there is a record of Ammniun Chloride with dosage 2.5 kg/palm in fertilizer supervisor daily report.	Complied
Criteria 7.5: Practices minimise and control erosion and degradaton of soils.			
7.5.1	(C) Maps that identify marginal and fragile soils, including steep sloped land are available.	<p>Simpang Perak/Buatan Estate:</p> <ul style="list-style-type: none"> • Simpang Perak Estate is used to be Buatan Estate Division 4 – 7. Soil Analysis in PT Inti Indosawit Subur – Buatan Estate carried out in October – December 2008. Reported under “Laporan Survey Tanah Semidetil Area Perkebunan Kelapa Sawit PT Inti Indosawit Subur Kebun Buatan”. Based on the report, the physiographic location in plain with hilly tuffaceous sedimentary rocks. Lithology parent material is clay and sand. Topographic of the area is rolling to hilly. Natural fertility is low to medium. • Soil map scale 1:20,000 available, from semi- detailed soil survey 2008 by R&D Asian Agri. The predominant soil type identified in Division IV, V and VI Buatan Estate composed of Typic dystrudepts (dominant), Typic kandiuults, Typic Endoaquults, Typic endoaquepts. • Topographic map scale 1:20,000 available, from semi-detailed soil survey the slope between 0-8%, 8-15%, 15-30% and >30%. The data and field information from semi-detailed soil survey 2008 by R&D Asian Agri. • Soil suitability: S2 2,656 Ha (47.2%) with limiting factor of low natural fertility; S3 2,050 Ha (36.4%) with limiting factor of topographic condition; N1 (not suitable) 925 Ha (16.4%) with limiting factor of slope more than 30% and sandy soil with rapid drainage. 	Complied

		<p>Scheme Smallholder: The soil map for all individual member was available at Plasma Buatan office and KUD office with scale 1:50,000. There are 4 series of soil type defined by Research and Development Asian Agri based on soil survey on April 2014 and soil survey semi detail on June 1998:</p> <ol style="list-style-type: none"> 1. Typic Dystrudepts 2. Typic Endoaquepts 3. Typic Endoaquults 4. Typic Kandiudults <p>Soil map and soil survey result recorded in "Laporan Survei Tanah Tinjau Kebun Plasma Buatan".</p>	
7.5.2	The replanting of palm oil is not conducted extensively on steep terrain in accordance with applicable regulations.	Based on field visit in slope area especially in replanting areas known that the management unit has provide terrace contour. For example, in replanting area, Block B12e Afdeling 2. There is no fire usage during that process. The management unit also provide legume cover crop to minimize the soil erosion.	Complied
7.5.3	New palm oil planting is not conducted on steep terrain in accordance with applicable regulations.	There is no new palm oil planting in Simpang Perak Estate.	Complied
Criteria 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.			
7.6.1	(C) Evidence of long-term land suitability for oil palm cultivation, soil maps or soil surveys that identify marginal and fragile soils, including steep terrain are available, in planning and operations.	Based on the document review, the results of the semi-detailed soil survey conducted by Asian Agri Research and Development dated 5 October 2017 found that there were areas that were categorized as non-conditional (N1) covering an area of 925 Ha (16.4% of the total area). To optimize those area, contour terraces and empty bunch applications should be implemented.	Complied

7.6.2	Extensive planting on marginal and fragile soils is avoided or, if necessary, carried out according to the best-practice soil management plan.	<p>Based on soil Analysis carried out by R & D on December 2008 in Buatan Estate. Reported under "Laporan Survey Tanah Semidetil Area Perkebunan Kelapa Sawit PT Inti Indosawit Subur Kebun Buatan". Based on the report, the physiographic location in plain with hilly tuffaceous sedimentary rocks. Lithology parent material is clay and sand. Topographic of the area is rolling to hilly. Natural fertility is low to medium. There is no peat soil identified in Simpang Perak Estate according to the latest soil analysis by R & D Asian Agri.</p> <p>There is no extensive planting within the certified area of PT Inti Indosawit Subur – Simpang Perak Estate and Buatan Plasma in accordance with Soil Analysis Report carried out by R & D on December 2008.</p> <p>KKPA: Whole KKPA area is peatland, PT Inti Indosawit Subur has performed monitoring and minimizing subsidence of peat soils. The organization has several map and documentation of monitoring peat subsidence. Record seen: "Peta Subsiden" (map of subsidence pole), "Peta Pemantauan Muka Air Tanah" (map of piezometer), "Peta Water Level" (map of water level pole), "Peta Drain Blok" (map of block drain), "Rekapitulasi Pengukuran Level Subsistensi Lahan", "Laporan Pemantauan Muka Air Tanah" and "Pengukuran Air Tanah Dangkal".</p>	Complied
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	Based on soil Analysis carried out by R & D on December 2008 in Buatan Estate. Reported under "Laporan Survey Tanah Semidetil Area Perkebunan Kelapa Sawit PT Inti Indosawit Subur Kebun Buatan". Based on the report, the physiographic location in plain with hilly tuffaceous sedimentary rocks. Lithology parent material is clay and sand.	Complied

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		<p>Topographic of the area is rolling to hilly. Natural fertility is low to medium. There is no peat soil identified in Simpang Perak Estate according to the latest soil analysis by R & D Asian Agri.</p> <p>There is no extensive planting within the certified area of PT Inti Indosawit Subur – Simpang Perak Estate and Buatan Plasma in accordance with Soil Analysis Report carried out by R & D on December 2008.</p> <p>KKPA: Whole KKPA area is peatland, PT Inti Indosawit Subur has performed monitoring and minimizing subsidence of peat soils. The organization has several map and documentation of monitoring peat subsidence. Record seen: “Peta Subsiden” (map of subsidence pole), “Peta Pemantauan Muka Air Tanah” (map of piezometer), “Peta Water Level” (map of water level pole), “Peta Drain Blok” (map of block drain), “Rekapitulasi Pengukuran Level Subsistensi Lahan”, “Laporan Pemantauan Muka Air Tanah” and “Pengukuran Air Tanah Dangkal”.</p>	
<p>Criteria 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.</p>			
7.7.1	<p>(C) No new planting on peatlands, regardless of depth, after 15 November 2018, in existing plantation areas, as well as in new development areas.</p>	<p>There is no new planting within certified area of PT Inti Indosawit Subur – Simpang Perak Estate and Buatan Plasma after November 2005. Currently, replanting activities are still in progress. First cycle starts from year 1988, 1989, 1990 and 1991.</p>	Complied
7.7.2	<p>Peat areas within the managed area are inventoried, documented and reported to the RSPO Secretariat (effective from November 15, 2018).</p>	<p>There is no new planting within certified area of PT Inti Indosawit Subur – Simpang Perak Estate and Buatan Plasma after November 2005. Currently, replanting activities are still in progress. First cycle starts from year 1988, 1989, 1990 and 1991.</p>	Complied

<p>PROCEDURAL NOTE: Maps and other documentation for peatlands are provided, prepared and shared according to the RSPO Working Group (Peatland Working Group / PLWG) audit guide (See Procedural Notes for Indicator 7.7.5 below).</p>			
<p>7.7.3</p>	<p>(C) Subsidence of peat is monitored, documented and minimised.</p>	<p>Simpang Perak/Buatan Estate: Simpang Perak Estate is used to be Buatan Estate Division 4 – 7. PT Inti Indosawit Subur – Buatan Estate conducted coordination with R & D department to performed re-analysis of soil in Buatan Estate area to determine whether peat soil is still existed.</p> <p>Soil Analysis carried out by R & D on December 2008 in Buatan Estate. Reported under “Laporan Survey Tanah Semidetil Area Perkebunan Kelapa Sawit PT Inti Indosawit Subur Kebun Buatan”. Based on the report, the physiographic location in plain with hilly tuffaceous sedimentary rocks. Lithology parent material is clay and sand. Topographic of the area is rolling to hilly. Natural fertility is low to medium. There is no peat soil identified in Simpang Perak Estate according to the latest soil analysis by R & D Asian Agri.</p> <p>Soil map scale 1:20,000 are available, from semi-detailed soil survey 2008 by R&D Asian Agri. The predominant soil type identified in Buatan Estate composed of:</p> <ul style="list-style-type: none"> • Typic Distrudepts 4,040 ha • Typic Endoaquents 140 ha • Typic Endoaquepts 515 ha • Typic Endoaquults 290 ha • Typic Kandiudults 621 ha • Typic Udipsaments 25 ha • Total 5,361 ha <p>Topographic map scale 1:20,000 available, from semi-detailed soil survey the slope between 0-8%, 8-15%, 15-30% and >30%. The data</p>	<p>Complied</p>

		<p>and field information from semi-detailed soil survey 2017 by R&D Asian Agri. Soil suitability: S2 2,656 Ha (47.2%) with limiting factor of low natural fertility; S3 2,050 Ha (36.4%) with limiting factor of topographic condition; N1 (not suitable) 925 Ha (16.4%) with limiting factor of slope more than 30% and sandy soil with rapid drainage. Therefore, drainability assessment of peat soils were not applicable for Simpang Perak Estate.</p> <p>KKPA: Whole KKPA area is peatland, PT Inti Indosawit Subur has performed monitoring and minimizing subsidence of peat soils. The organization has several map and documentation of monitoring peat subsidence. Record seen: "Peta Subsiden" (map of subsidence pole), "Peta Pemantauan Muka Air Tanah" (map of piezometer), "Peta Water Level" (map of water level pole), "Peta Drain Blok" (map of block drain), "Rekapitulasi Pengukuran Level Subsistensi Lahan", "Laporan Pemantauan Muka Air Tanah" and "Pengukuran Air Tanah Dangkal".</p> <p>Scheme Smallholder: Based on soil map of Kebun Plasma Buatan, issued by Asian Agri Research and Development Centre Tebing Tinggi – Sumatera Utara, that include in "Laporan Survei Tanah Tinjau Kebun Plasma Buatan" there was no peat soil in Kebun Plasma Buatan. There are 4 series of soil type defined by Research and Development Asian Agri based on soil survey on April 2014 and soil survey semi detail on June 1998:</p> <ol style="list-style-type: none"> 1. Typic Dystrudepts 2. Typic Endoaquepts 3. Typic Endoaquults 4. Typic Kandiudults. 	
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		<p>A field observation conducted to water level pole #45 at Block H03n, the scale is pointing at 48 cm; peat subsidence pole at Block H03m, the scale is pointing at 10 cm from the first installation in 2012; piezometer at Block G01d, the scale is pointing at 62 cm. Monitoring record were available for water level and piezometer performed twice in a month, whilst peat subsidence monitored in twice in a year.</p>	
7.7.4	<p>(C) Availability of implementation evidence of the water and land cover management program.</p>	<p>Simpang Perak/Buatan Estate: Simpang Perak Estate is used to be Buatan Estate Division 4 – 7. PT Inti Indosawit Subur – Buatan Estate conducted coordination with R & D department to performed re-analysis of soil in Buatan Estate area to determine whether peat soil is still existed.</p> <p>Soil Analysis carried out by R & D on December 2008 in Buatan Estate. Reported under "Laporan Survey Tanah Semidetil Area Perkebunan Kelapa Sawit PT Inti Indosawit Subur Kebun Buatan". Based on the report, the physiographic location in plain with hilly tuffaceous sedimentary rocks. Lithology parent material is clay and sand. Topographic of the area is rolling to hilly. Natural fertility is low to medium. There is no peat soil identified in Simpang Perak Estate according to the latest soil analysis by R & D Asian Agri.</p> <p>Soil map scale 1:20,000 are available, from semi-detailed soil survey 2008 by R&D Asian Agri. The predominant soil type identified in Buatan Estate composed of:</p> <ul style="list-style-type: none"> • Typic Distrudepts 4,040 ha • Typic Endoaquents 140 ha • Typic Endoaquepts 515 ha • Typic Endoaquults 290 ha • Typic Kandiudults 621 ha • Typic Udipsaments 25 ha 	Complied

		<ul style="list-style-type: none"> • Total 5,361 ha <p>Topographic map scale 1:20,000 available, from semi-detailed soil survey the slope between 0-8%, 8-15%, 15-30% and >30%. The data and field information from semi-detailed soil survey 2017 by R&D Asian Agri. Soil suitability: S2 2,656 Ha (47.2%) with limiting factor of low natural fertility; S3 2,050 Ha (36.4%) with limiting factor of topographic condition; N1 (not suitable) 925 Ha (16.4%) with limiting factor of slope more than 30% and sandy soil with rapid drainage. Therefore, drainability assessment of peat soils was not applicable for Simpang Perak Estate.</p> <p>KKPA: Whole KKPA area is peatland, PT Inti Indosawit Subur has performed monitoring and minimizing subsidence of peat soils. The organization has several map and documentation of monitoring peat subsidence. Record seen: "Peta Subsiden" (map of subsidence pole), "Peta Pemantauan Muka Air Tanah" (map of piezometer), "Peta Water Level" (map of water level pole), "Peta Drain Blok" (map of block drain), "Rekapitulasi Pengukuran Level Subsistensi Lahan", "Laporan Pemantauan Muka Air Tanah" and "Pengukuran Air Tanah Dangkal".</p> <p>Scheme Smallholder: Based on soil map of Kebun Plasma Buatan, issued by Asian Agri Research and Development Centre Tebing Tinggi – Sumatera Utara, that include in "Laporan Survei Tanah Tinjau Kebun Plasma Buatan" there was no peat soil in Kebun Plasma Buatan. There are 4 series of soil type defined by Research and Development Asian Agri based on soil survey on April 2014 and soil survey semi detail on June 1998:</p> <ol style="list-style-type: none"> 1. Typic Dystrudepts 2. Typic Endoaquepts 	
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<p>7.7.5</p>	<p>(C) Drainability assessments are conducted for plantations planted on peat following the RSPO Drainability Assessment Procedure, or other method recognized by RSPO, (at least five years or in accordance with the provisions of the RSPO Drainability Assessment Procedure) before replanting. The results of the assessment are used to determine the period of replanting to be carried out, as well as to gradually replace oil palm cultivation for at least 40 years or two cycles, (whichever is longer), before reaching the natural gravitational drainage limit for peat. If oil palm is gradually replaced, it is replaced by other commodity crops that are better suited for higher groundwater levels (paludiculture) or rehabilitated with natural vegetation.</p>	<p>Simpang Perak/Buatan Estate: Simpang Perak Estate is used to be Buatun Estate Division 4 – 7. PT Inti Indosawit Subur – Buatun Estate conducted coordination with R & D department to performed re-analysis of soil in Buatun Estate area to determine whether peat soil is still existed.</p> <p>Soil Analysis carried out by R & D on December 2008 in Buatun Estate. Reported under "Laporan Survey Tanah Semidetil Area Perkebunan Kelapa Sawit PT Inti Indosawit Subur Kebun Buatun". Based on the report, the physiographic location in plain with hilly tuffaceous sedimentary rocks. Lithology parent material is clay and sand. Topographic of the area is rolling to hilly. Natural fertility is low to medium. There is no peat soil identified in Simpang Perak Estate according to the latest soil analysis by R & D Asian Agri.</p> <p>Soil map scale 1:20,000 are available, from semi-detailed soil survey 2008 by R&D Asian Agri. The predominant soil type identified in Buatun Estate composed of:</p> <ul style="list-style-type: none"> • Typic Distrudepts 4,040 ha • Typic Endoaquents 140 ha • Typic Endoaquepts 515 ha 	<p>Complied</p>

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<p>PROCEDURAL NOTE: For 7.7.5: Detailed information on the RSPO Drainability Assessment Guide along with related concepts and detailed actions is contained in the Guidelines currently being adjusted / tested by the RSPO Working Group on Peatlands (Peatland Working Group / PLWG). The final version must obtain PLWG approval in January 2019 and will include additional Guide on the steps to be followed after deciding not to replant and the consequences for other stakeholders, farmers, local communities, and the unit of certification concerned. It is recommended that the trial methodology period is proposed to be extended for 12 months for all relevant management units (ie management units that have plantations on peat) to utilize the methodology and provide input to PLWG so that existing procedures can be further refined as needed before January 2020. The unit of certification has the option to delay replanting until the issuance of the revised Guidelines for the guidelines. Additional guidance for alternative commodity crops and rehabilitation of natural vegetation will be regulated by the PLWG.</p>			
7.7.6	<p>(C) All existing plantations on peat are managed according to applicable laws and/or "RSPO Guidelines for Best Management Practices (BMP) for Oil Palm Cultivation that are already on Peatlands", version 3 (June 2019) along with related audit guidelines (May 2019).</p>	<p>Whole KKPA area is peatland, PT Inti Indosawit Subur has performed monitoring and minimizing subsidence of peat soils. The organization has several map and documentation of monitoring peat subsidence. Record seen: "Peta Subsiden" (map of subsidence pole), "Peta Pemantauan Muka Air Tanah" (map of piezometer), "Peta Water Level" (map of water level pole), "Peta Drain Blok" (map of block drain), "Rekapitulasi Pengukuran Level Subsistensi Lahan", "Laporan Pemantauan Muka Air Tanah" and "Pengukuran Air Tanah Dangkal".</p>	Complied

		During the onsite audit, auditor concluded that KKPA areas has been installed with peat monitoring equipment such as piezometer, subsidence pole, and water table in each canal.	
7.7.7	(C) All peat areas not planted and reserved in managed areas (regardless of depth) are protected as 'peatland conservation areas'; unit of certification are prohibited from constructing drainage channels, building roads and new electricity lines on peatlands; unless if it is for a non-corporate land clearance. Peatlands are managed in accordance with 'RSPO Best Management Practices for the Management and Rehabilitation of Natural Vegetation related to Oil Palm Cultivation that already exists in Peatlands' (the latest version) along with relevant audit guidelines.	All areas of KKPA are peat areas. Those areas have been equipped with peat monitoring equipment such as piezometer, subsidence pole, and water table in each canal in accordance with RSPO Best Management Practices for Peat.	Complied
Criteria 7.8: Practices maintain the quality and availability of surface and groundwater.			
7.8.1	A water management plan is available and is implemented to support efficient use of water sources and continuous availability and avoid negative impacts on other users in the catchment. The plan referred to contains the following matters: 7.8.1a The unit of certification does not limit access to clean water or does not pollute the water used by the community.	PT Inti Indosawit Subur – Buatan Group has prepared the plan of water management plan as in “Program Manajemen Lingkungan 2020” consist of management water supply for domestic, water consumption and measurement of water quality. Water Management Plan, indicating the water need, permit and licensing, monitoring of water quality, infrastructure maintenance and conservation. The company has conducted measurement of water quality regularly (each semester) and consistent, the result of analysis semester 2 year 2020 shown that water quality is complies with national regulation. PT Inti Indosawit Subur – Buatan II POM has also prepared the procedure on protection of water courses under “SOP Pengendalian Riaprian” number AA-APM-OP-1100.21-R2, dated 25 th February 2016. Buatan II POM has permit for surface water usage from “Kementrian Pekerjaan Umum dan Perumahan Rakyat” as per “Keputusan Menteri Pekerjaan Umum dan Perumahan Rakyat nomor 14/KPTS/M/2018 tentang Pemberian izin Pengusahaan Sumber Daya Air kepada PT Inti	Complied

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		<p>Indosawit Subur untuk Usaha Industri di Sungai Laniago, Kabupaten Pelalawan dan Kabupaten Siak”, dated 5th January 2018.</p> <p>Buatan I POM also paid the water retribution each month to “UPT Pengelolaan Pendapatan, Badan Pendapatan daerah Pemerintah Provinsi Riau”. Sample verified: SPPD (Surat Setoran Pajak Daerah) untuk Pajak Pengambilan dan Pemanfaatan Air Permukaan untuk period October – December 2020, dated 27th February 2021, IDR XX.756.00</p> <p><u>Scheme smallholders:</u></p> <p>All of KUD has program on water management as in “Rencana dan Realisasi Penyusunan Pelapah Letter “U”, frond stacking.”Rencana dan Realisasi Perawatan Teresan sebagai Sarana Konservasi Tanah dan Air serta Upaya Pencegahan Erosi”</p>	
	<p>7.8.1b Workers have adequate access to clean water.</p>	<p>PT Inti Indosawit Subur – Buatan II POM has prepared the plan of water management plan as in “Program Manajemen Lingkungan 2020” consist of management water supply for domestic, water consumption and measurement of water quality. Water Management Plan, indicating the water need, permit and licensing, monitoring of water quality, infrastructure maintenance and conservation</p> <p>The result of moniting or testing the clean water / water consumption conducted by “Unit Pelaksana Teknisi Laboratorium Bahan Konstruksi”, Pekanbaru. Certificate of Analysis for Domestic Water (by cooking treatment), location in Buatan II POM – Report of Analysis No: MT.1/01.06.45.39, dated 29 May 2020, the reference of analysis report is based on PERMENKES NO 492/MENKES/PER/IV/2010</p>	
<p>7.8.2</p>	<p>(C) Water courses and wetlands are protected, including the maintenance and restoration of riparian zones and other buffer zones during or before replanting, in accordance with the "RSPO Manual on BMPs for the management and rehabilitation of riparian reserves" (April 2017) or</p>	<p>PT Inti Indosawit Subur – Buatan II POM has establish management plan to protect water courses and wetlands, including securing and maintaining appropriate riparian.</p> <ul style="list-style-type: none"> – Riparian restoration with forest vegetation plant/tree. 	<p>Complied</p>

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	Simplified Guide Management and Rehabilitation of Riparian Reserves (2018).	<ul style="list-style-type: none"> - Establish zone for zero chemical. No spraying and fertilizing along riparian zone. Based on visit in riparian zone (Sempadan Sungai Laniago) in block BA90 - Conserve natural vegetation in riparian zone <p>Restricted to conduct replanting palm oil in riparian area</p>	
7.8.3	Mill effluent is managed according to applicable regulations. The quality of mill effluent discharged, especially BOD (Biochemical Oxygen Demand) is monitored in accordance with applicable regulations.	<p>For mill effluent treatment, Buatan II Palm Oil Mill (PBD) has 11 ponds in effluent treatment system (WWTP), which consists of Colling Pond, Primary Anaerobic pond, Secondary Anaerobic pond, Acidification pond, and Buffering pond. Procedure of WWTP operation available in Mill Policy Manual (MPM) dated February 1, 2013, chapter AA-MPM-OP-1400.13-R1.</p> <p>Buatan II POM is planned for Biogas power plant construction in 2021 to generate electrical power by using waste water treatment. The biogas system has Anaerobic MBR system through digester Thermophilic fermentation, and anaerobic membrane tank.</p> <p>According to effluent monitoring data, all produced mill effluent used for land application. Mill holds permit to discharge waste water into land application from local authority through Decree number KTPS.660/BLH/781/2014, issued on 10th September 2014 valid for 5 years. Total area of land application covers 1,137 hectares at Block B, C, D, E, F.</p> <p>As required by LA permit, Mill conducts monthly check on discharged effluent in cooperation with accredited Laboratory (UPT Pengujian Material, Dinas Bina Marga Provinsi Riau). According to recent testing result, BOD level of applied effluent has met the applicable threshold of KepmenLH No.28/2003 regarding BOD limits of effluent discharge for land application. The level is maintained consistently less than 5,000 mg/L and debit <600 m³ per day. Based on result of monitoring January – December 2020 shown comply with legal requirement “PermenLHK No P.68/Setjen/Kum1/8/2016”. Sample seen:</p>	Complied

		Month	BOD (mg/l) – standard of quality 5,000	pH – standard of quality 6-9																					
		January	2,300	7.12																					
		February	3,200	7.19																					
		March	3,100	7.18																					
		April	3,114	7.45																					
		May	2,100	7.56																					
		June	2,100	7.86																					
		July	2,340	7.11																					
		August	2,410	7.24																					
		September	2,940	7.30																					
		October	2,720	7.24																					
		November	2,780	7.22																					
		December	2,640	7.41																					
7.8.4	Mill water use per tonne of FFB is monitored and recorded.	<p>Buatan II POM has recorded the mill water use per tonne FFB, includes monitoring of water usage for mill processing and domestic usage. Result of water usage monitoring is recorded under "Mill Operation Summary" year 2020, updated in December 2020. Budget in 2020 is 1.10 M3/Ton FFB, record in January – December 2020 has shown:</p> <table border="1" data-bbox="1131 1061 1684 1396"> <thead> <tr> <th>Month</th> <th>Water use per ton FFB</th> </tr> </thead> <tbody> <tr><td>January</td><td>1.01</td></tr> <tr><td>February</td><td>0.91</td></tr> <tr><td>March</td><td>0.98</td></tr> <tr><td>April</td><td>0.88</td></tr> <tr><td>May</td><td>1.20</td></tr> <tr><td>June</td><td>1.22</td></tr> <tr><td>July</td><td>1.12</td></tr> <tr><td>August</td><td>0.87</td></tr> <tr><td>September</td><td>0.97</td></tr> </tbody> </table>			Month	Water use per ton FFB	January	1.01	February	0.91	March	0.98	April	0.88	May	1.20	June	1.22	July	1.12	August	0.87	September	0.97	Complied
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Criteria 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised																									
7.9.1	Plans to increase the efficiency of fossil fuel use and to optimize renewable energy are available, monitored and documented	<p>PT Inti Indosawit Subur – Buatan II POM has prepared the program for improving efficiency of the use of fossil fuels and to optimize renewable energy under “Rencana Manajemen Lingkungan” year 2020. In point 2 stated to improving efficiency of the use of fossil fuels such monitoring on use of fossil fuels</p> <p>Fossil fuel records was maintenance and the trends shown. Energy use records include accurate measurements of renewable energy use per ton of FFB processed. All the shell and fiber are consumed internally as boiler fuel. Fossil fuel usage is recorded for operational purpose, including the efficiency analysis.</p> <p>Data verified: Energy resources for Generator and Turbine operation, year 2020:</p> <table border="1"> <thead> <tr> <th>Month</th> <th>Genset (KWH)</th> <th>Turbin (KWH)</th> </tr> </thead> <tbody> <tr> <td>July</td> <td>45,683</td> <td>466,100</td> </tr> <tr> <td>August</td> <td>21,408</td> <td>516,650</td> </tr> <tr> <td>September</td> <td>46,816</td> <td>418,100</td> </tr> <tr> <td>October</td> <td>41,792</td> <td>414,00</td> </tr> <tr> <td>November</td> <td>26,254</td> <td>478,850</td> </tr> <tr> <td>December</td> <td>19,904</td> <td>416,600</td> </tr> </tbody> </table> <p>Scheme Smallholders:</p>	Month	Genset (KWH)	Turbin (KWH)	July	45,683	466,100	August	21,408	516,650	September	46,816	418,100	October	41,792	414,00	November	26,254	478,850	December	19,904	416,600		Complied
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		<p>Each KUD has prepared a plan for improving efficiency of the use of fossil fuels and optimize of renewable energy under "Pedoman Pemanfaatan Sumber Energy", last review on 15th January 2020. The source of energy was identified e.g: water, gasoline, fuels, kerosen and electrical.</p>	
<p>Criteria 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.</p>			
<p>7.10.1</p>	<p>(C) GHG emissions for the unit of certification are identified and assessed. Plans to reduce or minimize GHG emissions are implemented, monitored through the PalmGHG calculator, and reported publicly.</p>	<p>PT Inti Indosawit Subur – Buatan II POM has identified the emission sources and pollution under document of "Enviromental Aspect-Impacts (Evaluasi Aspek-Dampak Lingkungan) year 2020".</p> <p>Identification of greenhouse gas (GHG) emissions sources both of Mill, Estate and Smallholders consist of emission from boiler and generator, effluent from mill wastewater, particulate from boiler stack, noise, fertilizer application, fossil fuels usage, transport of FFB</p> <p>The assessment of pollution activities was documented in "Mitigasi Has Rumah Kaca". All the activities of mill and estate as well as the waste generated has been well documented, for examples the operational activities from generator is generates air emissions, the company conducts periodic generator maintenance and perform quality measurement of exhaust emissions each semester to ensure air quality is comply with standard regulation.</p> <p><u>Scheme Smallholder:</u></p> <p>Manager of Kebun Plasma Buatan has prepared the list significant pollutants and identify sources of emissions, presented in "Identifikasi Sumber Polusi di Perkebunan Petani Kebun Plasma Buatan PT Inti Indosawit Subur 2020". List of significant pollutant such as emission</p>	<p>Complied</p>

		from FFB transportation, water pollutant from fertilizing and spraying activity, emission from generator usage.	
7.10.2	(C) Since 2014, an estimate of carbon stocks in the proposed development area has been carried out along with potential sources of emissions that can occur directly as a result of the development and plans to minimize these emissions are prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).	There is no new planting within certified area of PT Inti Indosawit Subur – Simpang Perak Estate and Scheme smallholders after November 2005. Currently, replanting activities are still in progress. All of the immature area was for replanting, for oil palm with planting year 1988, 1989, 1990 and 1991.	Not Applicable
7.10.3	(C) Other significant pollutant identification results are available and plans to reduce or minimize them are implemented and monitored.	<p>PT Inti Indosawti Subur – Buatan II POM has identified the significant pollutants and greenhouse gas (GHG) emissions.</p> <p>Significant pollutants and GHG such as: Emission, particulate, noise from boiler and generator, effluent from mill wastewater, fertilizer application, chemical applicator and transport of FFB.</p> <p>Monitoring of air emissions and ambient air quality conducted every semester. Emissions test conducted testing by Accreditation Laboratory. The results of the analysis have been demonstrated and reported to Environmental Agency every six months, e.g: Subject of analysis for air emission and Air Ambient in Buatan Estate - Report of sampling and analysis: certificate No 00068/CLAIAL, month January 2020 conducted by Sucofindo, the result is comply with Environmental Minister Decree No Kep-13/MENLH/2009, attachment I and The Labour Minister Decree No Kep-13/MEN/2011.</p>	Complied
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.	PT Inti Indosawit Subur – Buatan has developed an early warning system, to monitor the risk of fire. The system "Sistem Peringkat Bahaya Kebakaran 1 & 2". The monitoring system calculating the field condition, ignition risk, potential drought and smoke, fire handling, fire fighting difficulty and weather index. Patrol report indicating any fire incident.	Complied

		<p>Based on field visit in Simpang Perak Estate the land preparation is using mechanical method. No any open burning was noted for land preparation. It can also demonstrated in the agreement contract between compay and subcontractor that all activity of replanting is performed manual and mechanically.</p> <p><u>Scheme Smallholder:</u> There was no any open burning was noted for land preparation and any activity in KUD Bhirawa Bhakti and KUD Sawit Harapan. Replanting plan has been drawn up in the near future. The replanting plan was available under "S Pelaksanaan Replanting Kebun Plasma Buatan".</p> <p>During field visit at KUD Bhirawa Bhakti and KUD Sawit Harapan, there was a replanting and no burning activity. The land preparation is using mechanical method.</p>	
7.11.2	<p>The unit of certification establishes fire prevention and control measures for lands that are directly managed by the unit of certification.</p>	<p>There is no new planting within certified area of PT Inti Indosawit Subur – Simpang Perak Estate and Scheme smallholders after November 2005. Currently, replanting activities are still in progress. All of the immature area was for replanting, for oil palm with planting year 1988, 1989, 1990 and 1991.</p> <p>Replanting has been done mechanically, consist of: falling tree, chipping by excavator, terracing by excavator, digging, road construction, ditch/waterways construction, planting LCC and planting oil palm. Company has established "Ketentuan Replanting areal Mineral" tahun 2016. In the mechanism explained that replanting must be conducted mechanically without burning.</p> <p>Based on field visit in Simpang Perak Estate the land preparation is using mechanical method. No any open burning was noted for land preparation. It can also demonstrated in the agreement contract</p>	Complied

		<p>between company and subcontractor that all activity of replanting is performed manual and mechanically.</p> <p>During field visit at KUD Bhirawa Bhakti and KUD Sawit Harapan, there was a replanting and no burning activity. The land preparation is using mechanical method.</p>	
7.11.3	The unit of certification engages stakeholders in adjacent locations for fire prevention and control measures.	<p>The policy has communicated to all smallholder remember and local community to engages stakeholders in adjacent locations for fire prevention and control measures, e.g: Record of refreshment socialization in KUD Bhirawa Bhakri, was conducted on 16th January 2021.</p> <p>Replanting has been done mechanically, consist of: falling tree, chipping by excavator, terracing by excavator, digging, road construction, ditch/waterways construction, planting LCC and planting oil palm. Company has established "Ketentuan Replanting areal Mineral" year 2016. In the mechanism explained that replanting must be conducted mechanically without burning.</p>	Complied

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

PROCEDURAL NOTE for 7.12:

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

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

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

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

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<p>The development of this procedure will be guided by the No Deforestation Joint Steering Group (NDJSG) between the RSPO and HCSA members. In HFCC countries, RSPO will work with governments, communities and other stakeholders to develop this procedure through participatory processes at national and regional levels. The duration of this activity is specified in the Terms of Reference for NDJSG and is publicly available.</p>		
7.12.1	<p>(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCV or HCS forests.</p> <p>Historical analysis of Land Use Change Analysis (LUCA) is carried out before any new land clearing, in accordance with the RSPO LUCA Guidance document (see indicator 7.12.2).</p>	<p>There is no new planting within certified area of PT Inti Indosawit Subur – Simpang Perak Estate and Buatan Plasma after November 2005. Buatan Estate has planted since 1988 – 1991 while Buatan Plasma has planted since 1988 - 1993. Currently, replanting activities are still in progress. Replanting has been started since 2014 – 2020 and still continue until 2024.</p> <p>This indicator not applicable.</p>
7.12.2	<p>(C) HCV and HCS forests, and other conservation areas are identified as follows:</p> <p>7.12.2a) For existing plantations, with an HCV assessments conducted by RSPO- approved assessors and have no new land clearing after 15 November 2018, the existing HCV assessments remains valid.</p>	<p>Simpang Perak Estate and Scheme Smallholder:</p> <p>PT Inti Indosawit Subur – Buatan Estate has conducted the HCV identification in coordination with “Fakultas Kehutanan Institut Pertanian Bogor” on March –April 2009, under “Laporan Final Kajian Penuh Identifikasi dan Analisis Keberadaan High Conservation Value di Areal PT Inti Indosawit Subur, Kebun Buatan Provinsi Riau”. The HCV assessment conducted based on “Panduan Kawasan Bernilai Konservasi Tinggi di Indonesia”, issued by Konsorsium Revisi HCV Toolkit Indonesia dated 12/07/2008.</p> <p>Based on HCV identification total HCV area identified was 55.56 ha in Buatan Estate and Simpang Perak Estate.</p> <p>Simpang Perak Estate previously was include in Buatan Estate (Division IV, V, VI and VII). Curenly those division was separated from Buatan Estate and has its own estate namely Simpang Perak estate however the size of HCV area are remain same and not change. Division I, II and III as supply base Buatan I POM and Simpang Perak Estate Division (<i>previously was division IV, V, VI and VII currently changing to become</i></p>

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		<p><i>division I - IV</i>) as supply base Buatan II POM. So that the HCV area in Simpang Perak Estate as supply base Buatan II POM was 27.78 ha.</p> <p>HCV identified in Buatan Estate & Simpang Perak Estate consist of:</p> <ul style="list-style-type: none"> - HCV 1.1, 1.2 and 4.1: Riparian zone Kerinci Besar River (38.9 Ha); - HCV 1.1, 1.2 and 4.1: Riparian zone Laniago River (4.50 Ha); - HCV 1.2 and HCV 6: Conservation forest for Manggeris trees (Pohon Madu): 10.5 Ha; - HCV 1.2 and HCV 6: Conservation forest for Manggeris trees (Pohon Madu): 3.60 Ha; - HCV 6: ancient graveyard: 0.66 Ha; <p>HCV identification was consulted to the relevant stakeholder and HCV map is available in place. HCV assessment also including Buatan Smallholder area and used in scheme smallholder operation.</p> <p>The HCV identification document has explained the general condition of landscape surrounding company's plantation: there is no protected forest/ecosystem that feasible for wildlife to maintain its viability. Therefore no recommendation for wildlife corridor.</p>	
	<p>7.12.2 b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the latest HCSA Toolkit and HCV-HCSA Assessment Manual that is applicable at the time of the assessment. This includes stakeholder consultation and take into account wider landscape- level consideration.</p>	<p>There is no new planting within certified area of PT Inti Indosawit Subur – Simpang Perak Estate and Buatan Plasma after November 2005. Simpang Perak Estate has planted since 1988 – 1991 while Buatan Plasma has planted since 1988 - 1993. Currently, replanting activities are still in progress. Replanting has been started since 2014 – 2020 and still continue until 2024.</p> <p>This indicator not applicable.</p>	
<p>7.12.3</p>	<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</p>	<p>Based on HCV assessment report and field observation confirmed that there is no High Forest Cover Landscapes (HFCLs) within area of PT Inti Indosawit Subur Buatan Estate and Simpang Perak Estate.</p>	<p>Not Applicable</p>

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	<p>consideration regional and national multi-stakeholder processes. Until this procedure is developed and endorsed, 7.12.2 applies.</p>	<p>PT Inti Indosawit Subur Buatan Estate and Simpang Perak Estate was located in another purpose area which is for plantation and not in forest area. This indicator not applicable.</p>	
<p>PROCEDURAL NOTE for 7.12.3: Indicator 7.12.3. is not relevant to Indonesia, until further decisions by the RSPO.</p>			
<p>7.12.4</p>	<p>(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An Integrated management plans to protect and/or enhance HCV and HCS forests, peatland and other conservation areas are developed, implemented and adapted if necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan was developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p>	<p>PT Inti Indosawit Subur – Simpang Perak Estate & Buatan Estate has developed the Conservation Management Plan 2020 and 2021. Evidence Continous monitoring documentation and report regarding the status of RTE species and HCV presented in “Laporan Monitoring tumbuhan dan Satwaliar PT Inti Indosawit Subur, Kebun Simpang Perak/Buatan” Periode Juli – December 2020. Report of HCV management and monitoring also reported to “Balai Konservasi Sumberdaya Alam (BKSDA) Provinsi Riau”, latest reported on 6th January 2021 as per “Bukti Serah Terima Dokumen”.</p> <p>Monitoring documentation such as: “Daftar Temuan Satwa liar di Areal kebun” contain information regarding result of wildlife and RTE species monitoring, “Tabel Monitoring Kerusakan Kawasan Lindung” contain information regarding result of HCV area monitoring and HCV condition monitoring such as illegal hunting, HCV area disturbance, and HCV condition. Latest monitoring both RTE species and HCV area conducted on December 2020. Sample seen: Wildlife monitoring period December 2020 in Block F89b, Block A90c, Riparian of Ianiago river, Riparian of Kerinci Kanan river, Block 52, found presence of animal such as: <i>Aethopyga siparaja</i>, <i>Halcyon pileata</i>, <i>Centropus sinensis</i>, <i>Naja sumatrana</i>, <i>Macaca fascicularis</i>, <i>Tupaia tana</i>. Monthly monitoring of HCV area condition and animal species also performed by Foreman HCV (Adi Surya P) and each Foreman Afdeling, animal presence recorded in “Daftar Temuan Satwa Liar.</p>	<p>Complied</p>

		<p>Scheme Smallholder:</p> <p>Each KUD has appointed person in charge to monitor the RTE species presence in smallholder plantation area:</p> <ul style="list-style-type: none"> - KUD Buatan Jaya: Surat Keputusan Pengurus KUD Buatan Jaya Nomor: 12/Kpts/V/2017 dated 23 May 2017 Tentang Penunjukan atau Pengangkatan Petugas Perlindungan dan Pengawasan Satwa Liar dan Tumbuhan Dilindungi. appointed person: Sudirman. - KUD Bhirawa Bhakti: Surat Keputusan Pengurus KUD Bhirawa Bhakti Nomor: 02/Kpts/II/2018 dated 23 February 2018 Tentang Penunjukan atau Pengangkatan Petugas Perlindungan dan Pengawasan Satwa Liar dan Tumbuhan Dilindungi. appointed person: Pajar. - KUD Kebun Sawit Harapan: Surat Keputusan Pengurus KUD Kebun Sawit Harapan Nomor: 02/Kpts/KUDKSH/IV/2018 dated 23 April 2018 Tentang Penunjukan atau Pengangkatan Petugas Perlindungan dan Pengawasan Satwa Liar dan Tumbuhan Dilindungi. appointed person: Junaedi. - KUD Kebun Mulus Rahayu: Surat Keputusan Pengurus KUD Mulus Rahayu Nomor: 02/Kpts/KUD MR/I/2018 dated 5 January 2018 Tentang Penunjukan atau Pengangkatan Petugas Perlindungan dan Pengawasan Satwa Liar dan Tumbuhan Dilindungi. appointed person: Ade Sulianto. <p>Monitoring for RTE species performed each month by PIC. Result of monitoring presented in "Daftar Temuan Satwa Yang Dilindungi Tahun 2020". During January – December 2020, shown that in KUD Mulus Rahayu, KUD Birawa Bhakti, KUD Buatan Jaya and KUD Kebun Sawit Harapan there were still presence of animal such as: Sanca Bodo (<i>Python bivittatus</i>), Kucing hutan (<i>Prionailurus bengalensis</i>), Biawak</p>	
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		(<i>Varanus salvator</i>), Elang Tikus (<i>Elanus caeruleus</i>), Burung Madu (<i>Nectarinia jugularis</i>) and Cekakak Belukar (<i>Halcyon smyrnensis</i>).	
7.12.5	Where rights of local communities have been identified in HCV areas and HCS forest after 15 November 2018, peatland and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.	There is no new planting within certified area of PT Inti Indosawit Subur – SImpang Perak Estate and Buatan Plasma after November 2005. Buatan Estate has planted since 1988 – 1991 while Scheme Smallholder Buatan Plasma has planted since 1988 - 1993. Currently, replanting activities are still in progress. Replanting has been started since 2014 – 2020 and still continue until 2024. This indicator 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.	PT. Inti Indosawit Subur – Buatan II POM and Estate has a program to socialize the status of protected, rare, threatened or endangered (RTE) to all workers, it was also programmed each year as per "Conservation Management Plan". Socialization has been conducted through master morning in each division by field assistant, latest refreshment to workers on 5 December 2020. Company also provides signboard regarding HCV protection and RTE species protection in the strategic place as a campaign to give awareness to the workers/people. Company also implemented appropriate sanction disciplinary measures to any individual working for the company who is found to capture, harm, collect or kill these species. Sanction and process based on UU No. 5 tahun 1990. Interview with workers regarding their understanding on RTE species protection will be conducted during onsite audit later. Scheme Smallholder: Training & Socialization has been provided to the individual members about the status of HCV and RTE species and the applicable disciplinary measures. Training was conducted in each KUD by plasma management on 30 January 2020 and 26 November 2020. The training and	Complied

		<p>socialization was attend by smallholder member representative and KUD official from each KUD, the venue of training was in KUD Sejahtera and Desa Buana Bhakti. Training attend by 60 participant on January and 29 participants on November 2020. Minutes of training and attendant list were available.</p> <p>During onsite audit and interview with smallholder member confirmed that they have sufficient understanding on RTE species protection and prohibition of illegal hunting.</p>	
7.12.7	The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.	<p>There is no new planting within certified area of PT Inti Indosawit Subur – Simpang Perak Estate and Buatan Plasma after November 2005. Simpang Perak Estate has planted since 1988 – 1991, while Scheme Smallholder Buatan Plasma has planted since 1988 - 1993. Currently, replanting activities are still in progress. Replanting has been started since 2014 – 2020 and still continue until 2024.</p> <p>This indicator not applicable.</p>	Not Applicable
7.12.8	(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV- HCSA assessment since 15 November 2018, the Remediation and Compensation Procedures (RaCP) applies.	<p>There is no new planting within certified area of PT Inti Indosawit Subur – Simpang Perak Estate and Buatan Plasma after November 2005. Simpang Perak Estate has planted since 1988 – 1991, while Scheme Smallholder Buatan Plasma has planted since 1988 - 1993. Currently, replanting activities are still in progress. Replanting has been started since 2014 – 2020 and still continue until 2024.</p> <p>This indicator not applicable.</p>	Not Applicable

Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2020** for **Buatan II Palm Oil Mill** and supply base was calculated using the PalmGHG Calculator version 4. 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 **2020** for **Buatan II Palm Oil Mill** and supply base are as following:

Emission per product	tCO₂e/t Product	Extraction	%
CPO	0.74	OER	19.20
PK	0.74	KER	5.33

Production	t/yr	Land Use	Ha
FFB Process	317,713	OP Planted Area	11,752
CPO Produced	60,450	OP Planted on peat	0
PK Produced	16,150	Conservation (forested)	0
		Conservation (non-forested)	35.4
		Total	11,787.4

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	343343.01	0,67	14,716.18	0.10	0	0	49059.19	0.09
CO ₂ Emission from fertilizer	517.40	0.00	2289.00	0.02	0	0	2806.40	0.03
NO ₂ Emission	2861.78	0.05	4426.14	0.03	0	0	7287.92	0.08
Fuel Consumption	511.59	0.01	1389.15	0	0	0	1900.74	0.01
Peat Oxidation	0	0	0	0	0	0	0	0
Sink								
Crop Sequestration	-32552.62	-0.63	-13948.98	0	-0.09	-0.09	--46501.60	-0.09
Conservation Sequestration	0	0	0	0	0	0	0	0
Total	4,327.50	0.08	6324.29	0.04	12822.90	0	23474.60	0.13

*Note: Includes both estates and smallholders

Summary of Mill Emission and Credit

	tCO₂e	tCO₂e/tFFB
Emission		
POME	47196.49	0.16
Fuel Consumption	284.40	0
Grid Electricity Utilisation	20.13	0
Credit		

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Export of Grid Electricity	-58.49	0
Sales of PKS	-18955.20	-0.07
Sales of EFB	0	0
Total	28487.33	0.10

Summary of Kernel Crusher Emission and Credit (if applicable)

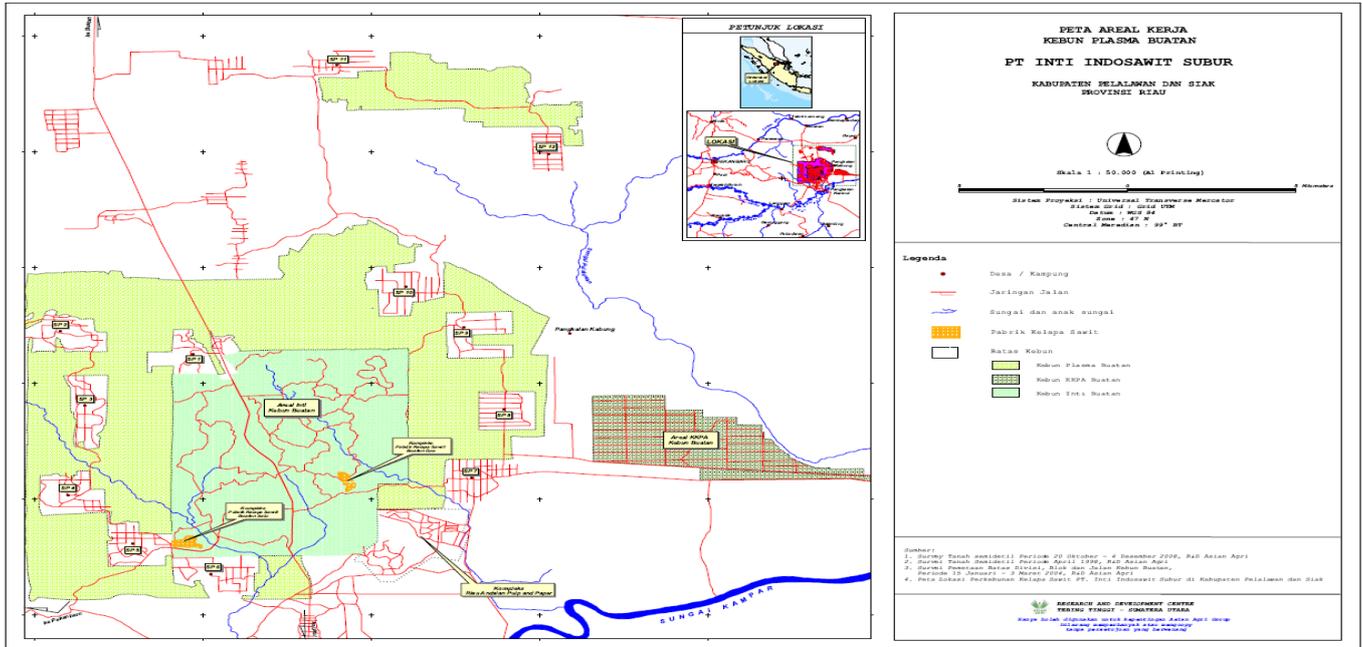
Emissions	tCO₂e
PK from own mill	-
PK from other source	-
Fuel Consumptions	-
Total Crusher emissions	-

*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: Estate Field Map



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Appendix E: List of Smallholder Registered and sampled

No	Name of farmer	Location	GPS Reference		Area Summary (Ha)		Forecasted annual FFB Production (MT)	Date of joining	Smallholder ID
			Latitude (N)	Longitude (E)	Total Certified Area	Planted Area			
KUD Mulus Rahayu									
1	Musbah	Delima Jaya Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 30' 37.6" N	101° 49' 27.4" E	2	2	66	1988	51
2	Joko Susilo/Junaini	Delima Jaya Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 30' 37.6" N	101° 49' 27.4" E	2	2	66	1988	97
3	Sirin/Nelli Maharani	Delima Jaya Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 30' 37.6" N	101° 49' 27.4" E	2	2	66	1988	100
4	Sani/Martiani	Delima Jaya Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 30' 37.6" N	101° 49' 27.4" E	2	2	66	1988	184
5	Pawito	Delima Jaya Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 30' 37.6" N	101° 49' 27.4" E	2	2	66	1988	185
6	Kiki Sukari/Sukari	Delima Jaya Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 30' 37.6" N	101° 49' 27.4" E	2	2	59	1988	282
7	Samidi	Delima Jaya Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 30' 37.6" N	101° 49' 27.4" E	2	2	59	1988	283
8	Edi Jubaedi	Delima Jaya Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 30' 37.6" N	101° 49' 27.4" E	2	2	59	1988	284
9	Abdul Latif Haji Ibrahim/Ayub	Delima Jaya Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 30' 37.6" N	101° 49' 27.4" E	2	2	59	1988	289
10	Soleh	Delima Jaya Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 30' 37.6" N	101° 49' 27.4" E	2	2	59	1988	290
11	Sarino	Delima Jaya Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 30' 37.6" N	101° 49' 27.4" E	2	2	57	1988	508
12	Misnan/Asmarani	Delima Jaya Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 30' 37.6" N	101° 49' 27.4" E	2	2	57	1988	516

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No	Name of farmer	Location	GPS Reference		Area Summary (Ha)		Forecasted annual FFB Production (MT)	Date of joining	Smallholder ID
			Latitude (N)	Longitude (E)	Total Certified Area	Planted Area			
		Siak Regency, Riau Province							
13	Sarimin/Sanarya	Delima Jaya Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 30' 37.6" N	101° 49' 27.4" E	2	2	57	1988	517
14	Abas/Arnedi Abbas	Delima Jaya Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 30' 37.6" N	101° 49' 27.4" E	2	2	57	1988	560
KUD Bhirawa Bakti									
1	Jumali Bin Ireng	Buana Bhakti Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 31' 20.1" N	101° 47' 24.7" E	2	2	36	1989	506
2	Sarta Bin Murtam/Anas Ansori	Buana Bhakti Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 31' 20.1" N	101° 47' 24.7" E	2	2	48	1989	480
3	Sucipto	Buana Bhakti Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 31' 20.1" N	101° 47' 24.7" E	2	2	48	1989	481
4	Sukarno	Buana Bhakti Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 31' 20.1" N	101° 47' 24.7" E	2	2	48	1989	482
5	Dayat Bin Dasa/Poniran	Buana Bhakti Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 31' 20.1" N	101° 47' 24.7" E	2	2	48	1989	534
6	Rodhi	Buana Bhakti Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 31' 20.1" N	101° 47' 24.7" E	2	2	48	1989	535
7	Suliono Bin Sukri/Sari	Buana Bhakti Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 31' 20.1" N	101° 47' 24.7" E	2	2	48	1989	543
8	Komar Bin Tohidi/Suyadi	Buana Bhakti Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 31' 20.1" N	101° 47' 24.7" E	2	2	48	1989	544
9	Supaijo/H. Nainggolan	Buana Bhakti Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 31' 20.1" N	101° 47' 24.7" E	2	2	36	1989	569
10	Munar/Pajar	Buana Bhakti Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 31' 20.1" N	101° 47' 24.7" E	2	2	36	1989	581

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			Latitude (N)	Longitude (E)	Total Certified Area	Planted Area			
11	Hendrizal/Suyadi	Buana Bhakti Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 31' 20.1" N	101° 47' 24.7" E	2	2	45	1990	1229
12	Sumari/Paryadi	Buana Bhakti Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 31' 20.1" N	101° 47' 24.7" E	2	2	45	1990	1222
13	Fahmi Idris/Tarmuji	Buana Bhakti Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 31' 20.1" N	101° 47' 24.7" E	2	2	45	1990	1223
14	Tosin/Sani Awu	Buana Bhakti Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 31' 20.1" N	101° 47' 24.7" E	2	2	45	1990	1224

KUD Sawit Harapan

1	Miskam/Teguh	Gabung Makmur Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 29' 10.9" N	101° 54' 36.7" E	2	2	37	1991	3917
2	Agus/Supio	Gabung Makmur Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 29' 10.9" N	101° 54' 36.7" E	2	2	37	1991	3921
3	Imam Basuki/Warso	Gabung Makmur Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 29' 10.9" N	101° 54' 36.7" E	2	2	40	1992	3887
4	Marjuni/H. Poniman	Gabung Makmur Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 29' 10.9" N	101° 54' 36.7" E	2	2	40	1992	3890
5	Bindu Sianturi/Marjuni	Gabung Makmur Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 29' 10.9" N	101° 54' 36.7" E	2	2	40	1992	3891
6	Abdul Majid/Tukiran	Gabung Makmur Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 29' 10.9" N	101° 54' 36.7" E	2	2	40	1992	3892
7	Enjuh/Kartoyo	Gabung Makmur Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 29' 10.9" N	101° 54' 36.7" E	2	2	42	1992	3937
8	Hariaman/Sukiman	Gabung Makmur Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 29' 10.9" N	101° 54' 36.7" E	2	2	42	1992	3940
9	Nanak/Aceng	Gabung Makmur Village, Kerinci Kanan District,	00° 29' 10.9" N	101° 54' 36.7" E	2	2	48	1993	4104

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No	Name of farmer	Location	GPS Reference		Area Summary (Ha)		Forecasted annual FFB Production (MT)	Date of joining	Smallholder ID
			Latitude (N)	Longitude (E)	Total Certified Area	Planted Area			
		Siak Regency, Riau Province							
10	Kamad/Samuji	Gabung Makmur Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 29' 10.9" N	101° 54' 36.7" E	2	2	48	1993	4106
11	Teguh/Teguh	Gabung Makmur Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 29' 10.9" N	101° 54' 36.7" E	2	2	48	1993	4160
12	Suwarto/Suwarto	Gabung Makmur Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 29' 10.9" N	101° 54' 36.7" E	2	2	48	1993	4167
KUD Buatan Jaya									
1	Supendi/Suparno	Jatimulya Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 31' 06.8" N	101° 53' 53" E	2	2	46	1991	3628
2	Radisan	Jatimulya Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 31' 06.8" N	101° 53' 53" E	2	2	46	1991	3633
3	Wagiso/Jaenal	Jatimulya Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 31' 06.8" N	101° 53' 53" E	2	2	49	1991	3594
4	Abdul Halim	Jatimulya Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 31' 06.8" N	101° 53' 53" E	2	2	49	1991	3595
5	Suyono/Suradi	Jatimulya Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 31' 06.8" N	101° 53' 53" E	2	2	47	1991	3601
6	Sugianto	Jatimulya Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 31' 06.8" N	101° 53' 53" E	2	2	47	1991	3607
7	Narto/Mulyono	Jatimulya Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 31' 06.8" N	101° 53' 53" E	2	2	47	1991	3608
8	Siman/Bambang	Jatimulya Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 31' 06.8" N	101° 53' 53" E	2	2	48	1991	3504
9	Sario/Emri	Jatimulya Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 31' 06.8" N	101° 53' 53" E	2	2	48	1991	3505
10	Sukatno/Supriyono	Jatimulya Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 31' 06.8" N	101° 53' 53" E	2	2	48	1991	3530
11	Syahril/Sokip	Jatimulya Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 31' 06.8" N	101° 53' 53" E	2	2	42	1991	2729

RSPO P&C Public Summary Report

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No	Name of farmer	Location	GPS Reference		Area Summary (Ha)		Forecasted annual FFB Production (MT)	Date of joining	Smallholder ID
			Latitude (N)	Longitude (E)	Total Certified Area	Planted Area			
12	Mislan/Sardi	Jatimulya Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 31' 06.8" N	101° 53' 53" E	2	2	42	1991	3432
13	Cayatno	Jatimulya Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 31' 06.8" N	101° 53' 53" E	2	2	42	1991	3433
14	Kasmowiyono/Karmo	Jatimulya Village, Kerinci Kanan District, Siak Regency, Riau Province	00° 31' 06.8" N	101° 53' 53" E	2	2	42	1991	3434
Total					108	108	2,630		

Appendix F: List of Abbreviations

a.i	Active Ingredient
BOD	Biochemical Oxygen Demand
CB	Certification Bodies
CHRA	Chemical Health Risk Assessment
COD	Chemical Oxygen Demand
CPO	Crude Palm Oil
CSPO	Certified Sustainable Palm Oil
CSPKO	Certified Sustainable Palm Kernel Oil
EFB	Empty Fruit Bunch
EHS	Environmental, Health and Safety
EIA	Environmental Impact Assessment
EMS	Environmental Management System
FFB	Fresh Fruit Bunch
FPIC	Free, Prior, Informed and Consent
GAP	Good Agricultural Practice
GHG	Greenhouse Gas
GMP	Good Manufacturing Practice
GPS	Global Positioning System
HCV	High Conservation Value
IPM	Integrated Pest Management
IP	Identity Preserved
IS - CSPO	Independent Smallholder Certified Sustainable Palm Oil
IS – CSPKO	Independent Smallholder Certified Sustainable Palm Kernel Oil
IS – CSPKE	Independent Smallholder Certified Sustainable Palm Kernel Expeller
ISCC	International Sustainable Carbon Certification
ISS	Independent Smallholder Standard
KKPA	Kredit Koperasi Primer untuk Anggota
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