

RSPO PRINCIPLE AND CRITERIA PUBLIC SUMMARY REPORT

□ Initial Assessment
☑ Annual Surveillance Assessment (2_1)
☐ Recertification Assessment (Choose an item.)
□ Extension of Scope

Client Company Name / Parent Company: PT Inti Indosawit Subur

Client Company / Parent Company Address: Jl Palembang Kav 35-37 Jakarta 10230, Indonesia

Certification Unit:

PT Inti Indosawit Subur – Ukui II Palm Oil Mill

Location of Certification Unit: Village of Ukui, Sub-District of Ukui, Pelalawan Regency, Riau Province, Indonesia

Date of Final Report: 11/10/2022



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Section 1: Scope of the Assessment

1. Company Details					
Parent Company	PT. Inti Indosawit Subur	PT. Inti Indosawit Subur			
RSPO Membership Number	1-0022-06-000-00	Membership	Approval Date	06/02/2006	
Address	Jl Palembang Kav 35-37 Jakarta 10230, Indonesia				
Palm Oil Mill / Group Manager / Estate (Certification Unit)	PT. Inti Indosawit Subur – Ukui II Palm Oil Mill				
Location / Address	Village of Ukui, Sub-District o	f Ukui, Pelalaw	an Regency, Riau F	Province, Indonesia	
Website	www.asianagri.com				
Management Representative	Mr Ivan Novrizaldie E-mail Ivan novrizaldie@asianagri.com				
Telephone	+6221 2301119	Facsimile	+6221 2301120		

2. Certification Informat	2. Certification Information						
Certificate Number	RSPO 565807	Certificat	te Start Date	25/08/2021			
Date of First Certification	1/03/2011	Certificat	te Expiry Date	24/08/2026			
Scope of Certification	Production of Palm Oil and Pa	alm Kernel					
Visit Objectives	 To conduct onsite audit as a continuation of previous remote audit for Recertification assessment Determination of the conformity and consistency of Ukui II POM and its supply bases with RSPO Principle and Criteria. 						
	• Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements.						
Assessment Cycle	☐ Pre Assessment (Choose a	an item.)					
	☐ Initial Assessment						
	☑ Annual Surveillance Assess	ment (ASA	2_1)				
	☐ Recertification Assessment	(Choose a	ın item.)				
	☐ Scope Extension						
Applicable Standards /	RSPO Certification System for	P&C and F	SPO ISH 2020				
Normative Reference	☐ Choose an item.						
	☑ Indonesia National Interpretation 2020 for RSPO P&C 2018 for the Production of Sustainable Palm Oil						
Supply Chain Module	☐ Identity Preserved; ☐ Mass Balance						
ISH certification Phase	☐ Eligibility ☐ Milestone A ☐	☐ Milestone	B ⊠ Not Applicable	□ Eligibility □ Milestone A □ Milestone B ☒ Not Applicable			



3. Other Certifications						
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date			
ID05/65250	ISO 14001:2015	SGS	10/06/2023			
EU-ISCC-Cert-DE100-02044122	ISCC EU	SGS	02/02/2023			
SGS-ID-ISPO-0032	ISPO	SGS	20/03/2024			

4. Location(s) of Mill & Supply Bases						
Name (Mill / Supply Base / Group	Location	GPS Coordinates				
Manager / Smallholders)		Latitude	Longitude			
Ukui II POM	Village of Ukui, Sub-District of Ukui, Pelalawan Regency, Riau Province	00° 16′ 39.51″ S	102° 07′ 30.99″ E			
Soga Estate	Ukui Dua village, Ukui Sub-District, Pelalawan Regency, Riau Province	00° 12′ 47.18″ S	102° 09′ 13.61″ E			
Sei Lala Estate	Ukui village, Ukui Sub-District, Pelalawan Regency, Riau Province	00° 16′ 39.51″ S	102° 07′ 03.99″ E			
KUD Tani Subur	Sei Beberas Hilir village, Lubuk Batu Jaya Sub- district, Indragiri Hulu Regency, Riau Province	00° 23′ 09.5″ S	102° 07′ 52.08″ E			
KUD Karya Tani	Sei Beras Beras village, Lubuk Batu Jaya Sub- District, Indragiri Hulu Regency, Riau Province	00° 23′ 14.8″ S	102° 04′ 58.07″ E			
KUD Mekar Abadi	Tasik Juang village, Lubuk Batu Jaya Sub- District, Indragiri Hulu Regency, Riau Province	00° 22′ 37.03″ S	102° 05′ 01.00″ E			
KUD Trani Maju	Pontian Mekar village, Lubuk Batu Jaya Sub- District, Indragiri Hulu Regency, Riau Province	00° 20′ 35.03″ S	102° 05′ 03.03″ E			
KUD Tani Bahagia	Kulim Jaya village, Lubuk Batu Jaya Sub- District, Indragiri Hulu Regency, Riau Province	00° 22′ 50.01″ S	102° 07′ 31.00″ E			
KUD Usaha Tani	Air Putih village, Lubuk Batu Jaya Sub-District, Indragiri Hulu Regency, Riau Province	00° 18′ 15.06″ S	102° 07′ 30.5″ E			



5. Description of Supply Base						
New Planting Development	☐ No (no change in to	tal planted area	a)	☐ Yes (please refer to Principle 7 for detail		
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted	
Soga Estate	2,926	34	28	2,988	97.92	
Sei Lalal Estate	3,064	82	32	3,178	96.41	
Total Sub A	5,990	116	60	6,166	96.16	
KUD Tani Subur (367 smallholders)	780	0	0	780	100	
KUD Karya Tani (367 smallholders)	734	0	0	734	100	
KUD Mekar Abadi (287 smallholders)	574	0	0	574	100	
KUD Trani Maju (481 smallholders)	962	0	0	962	100	
KUD Tani Bahagia (683 smallholders)	1,366	0	0	1,366	100	
KUD Usaha Tani (646 smallholders)	1,292	0	0	1,292	100	
Total Sub B	5,708	0	0	5,708	100	
Total	11,698	116	60	11,874	99.29	

6. Plantings & Cycle						
Estate / Smallholders		Age (Years) - ha			Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Soga Estate	0	0	2,731	195	2,926	0
Sei Lala Estate	277	10	318	2,459	2,777	277
KUD Tani Subur	0	0	44	736	780	0
KUD Karya Tani	0	0	0	734	734	0
KUD Mekar Abadi	0	0	130	444	574	0
KUD Trani Maju	0	0	84	878	962	0
KUD Tani Bahagia	0	0	0	1,366	1,366	0
KUD Usaha Tani	0	0	0	1,292	1,292	0
Total (ha)	277	0	3,307	8,104	11,411	277
Note:		•	•			•



Estate /	Tonnage (MT) / year						
Smallholders	Estimated last year (Aug 2021 – July	21 – July (Mar 2021 – April 2022)		Forecast (Aug 2022 – July			
	2022)	Previous license period (Mar 2021-July 2021)	Current license period (Aug 2021 – Apr 2022)	2023)			
Soga Estate	79,265	32,051	52,100	73,810			
Sei Lala Estate	67,176	27,584	46,038	62,553			
KUD Tani Subur	17,181	7,103	11,952	15,998			
KUD Karya Tani	16,491	6,858	12,086	15,432			
KUD Mekar Abadi	32,393	12,124	20,171	28,867			
KUD Trani Maju	13,293	5,363	9,927	11,442			
KUD Tani Bahagia	23,274	7,908	15,900	18,046			
KUD Usaha Tani	27,164	10,116	14,526	14,684			
Total	276,237*	291,	807	240,832			

8. Summary of Certified Tonnage of FFB (from other certified unit(s))						
Estate /	Tonnage (MT) / year					
Smallholders	Estimated last year (Aug 2021 – July	Actual (Mar 2021 – April 2022)		Forecast (Aug 2022 – July		
	2022)	Previous license period (Mar 2021-July 2021)	Current license period (Aug 2021 – Apr 2022)	2023)		
NIL						
Total						

9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)					
Out growers /	Tonnage (MT) / year				
smallholders	Estimated last year (Aug 2021 – July	Actual (Mar 2021 – April 2022)		Forecast (Aug 2022 – July	
	2022)	Previous license period (Mar 2021-July 2021)	Current license period (Aug 2021 – Apr 2022)	2023)	
NIL	-	-	-	-	
Total	-			•	



9A. I	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	March 2021	20,195	•	20,195			
2	April 2021	23,286	•	23,286			
3	May 2021	22,316	-	22,316			
4	June 2021	21,095	-	21,095			
5	July 2021	22,213	-	22,213			
6	August 2021	25,137	-	25,137			
7	September 2021	23,850	-	23,850			
8	October 2021	20,284	-	20,284			
9	November 2021	20,897	-	20,897			
10	December 2021	20,152	-	20,152			
11	January 2022	17,801	-	17,801			
12	February 2022	15,633	-	15,633			
13	March 2022	18,193	-	18,193			
14	April 2022	20,755	-	20,755			
	TOTAL	291,807	-	291,807			

10. Summary of Certified Tonnage (MT) (not applicable for ISS)						
Estimated last year (Aug 2021 – July 2022)	(N	_	tual – April 2022)	Forecast (Aug 2022 – July 2023)		
	Previous license (Mar 2021-July	•	Current license period (Aug 2021 – Apr 2022)			
FFB		F	FB	FFB		
276,237 mt*	109,105	mt	182,702 mt	240,832 mt		
	TOTAL		291,807 mt			
CPO (OER: 21.43%)		CPO (OEF	R: 20.93%)	CPO (OER: 21.32%)		
59,207 mt**	22,843 ı	nt	37,589 mt	51,346 mt		
	TOTAL		60,433 mt			
PK (KER: 5.50%)		PK (KER	: 5.42 %)	PK (KER: 5.5%)		
15,193 mt***	5,919 n	nt	10,047 mt	13,246 mt		
	TOTAL 15,965 mt					
Notes:	IUIAL		15,965 Mt			



- * FFB volume extension 17,027.01mt; total FFB 293,364.01 mt
- ** CPO volume extension 3,511mt; total CPO 62,718 mt
- ***PK volume extension 222mt; total PK 16,135 mt

10A.	LOA. Monthly Records of Certified CPO & PK since the last audit							
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)					
1	March 2021	4,384	1,120					
2	April 2021	4,902	1,284					
3	May 2021	4,556	1,208					
4	June 2021	4,374	1,103					
5	July 2021	4,627	1,204					
6	August 2021	5,144	1,384					
7	September 2021	4,884	1,302					
8	October 2021	4,195	1,115					
9	November 2021	4,333	1,145					
10	December 2021	4,202	1,124					
11	January 2022	3,771	995					
12	February 2022	3,255	845					
13	March 2022	3,697	987					
14	April 2022	4,109	1,149					
	TOTAL	60,433	15,965					

11. Summa	11. Summary of Actual Volume sold								
Current Lice	Current License period (Aug 2021 – Apr 2022)								
	RSPO Certified	Other Schei	nes Certified	Conventional	Total				
	RSPO Certified	ISCC	Others	Conventional	iotai				
CPO (MT)	22,303	0	0	0	22,303				
PK (MT)	5,835	0	0	0	5,835				
Credits	0	0	0	0	0				
Previous Lic	ense period (Mar 2021-	July 2021)							
CPO (MT)	36,595	1,084	0	0	37,679				
PK (MT)	10,082	0	0	0	10,082				
Credits	0	0	0	0	0				
Note: Convent	ional is RSPO certified materia	l but sold as non-RS	PO.						



No.	Buyers Name	PalmTrace Trading License Number	Certified CPO Sold (MT)	Certified PK Sold (MT)			
1	PT Sari Dumai Sejati	-	51,590	-			
2	PT Padang Raya Cakrawala	-	7,308	-			
3	PT IIS – Ukui I KCP	-	-	15,659			
4	PT Sari Dumai Sejati	-	-	258			
TOTAL 58,898 15,917							

11B. Records of certified CPO & PK Sold under other schemes since the last audit (if any) **Certified CPO Sold** No. **Buyers Name Scheme Name Certified PK Sold** (MT) (MT) **ISCC** 0 1 **AAFZCO** 1,084 **TOTAL** 1,084 0 Note:

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

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



12. Inde	12. Independent Smallholders Certified Tonnage (MT) / Volume								
	Estimated last year (Not Applicable)		(No	Actual (Not Applicable)			Forecast (Not Applicable)		
Dhasa	Eligibility	MS A	MS B	Eligibility	MS A	MS B	Eligibility	MS A	MS B
Phase	40%	70%	100%	40%	70%	100%	40%	70%	100%
FFB									
IS-CSPO	-	-		-	-		-	-	
IS-CSPKO	-	-		-	-		-	-	
IS-CSPKE	-	-		-	-		-	-	
CSPK	-	-		-	-		-	-	

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

13. Inde	13. Independent Smallholders Actual Sold Tonnage / Volume							
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	СЅРК	IS-CSPKO	IS-CSPKE	
Current Li	Current License period (Not Applicable)							
Credits				-	-	-	-	
Physical	-	-	-					
Previous I	Previous License period (Not Applicable)							
Credits				-	-	-	-	
Physical	-	-	-					

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



Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn. Bhd. (ASI Accreditation Number: ASI-ACC-067) Suite 29.01 Level 29, The Gardens North Tower, Mid Valley City, Lingkaran Syed Putra, 59200 Kuala Lumpur, Malaysia.

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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 **26-31 May 2022 and 1-2 June 2022**. The audit programme is included as Section 2.3.

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 2018 was used as the normative reference to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

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

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

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

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

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



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

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

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

Assessment Program						
Name (Mill / Supply Base)	Year 1 (Recertification 2)	Year 2 (ASA2_1)	Year 3 (ASA2_2)	Year 4 (ASA2_3)	Year 5 (ASA2_4)	
Ukui II POM	Х	Х	Х	Х	Х	
Soga Estate	Х	Х	Х	Х	Х	
Sei Lala Estate	Х	Х	Х	Х	Х	
KUD Tani Subur		X		Х		
KUD Karya Tani		Х		Х		
KUD Mekar Abadi		Х			Х	
KUD Trani Maju			Х		Х	
KUD Tani Bahagia	Х		Х	Х		
KUD Usaha Tani	Х		Х		Х	

Tentative Date of Next Visit: April 26, 2023 - April 30, 2023

Total Number of Mandays: 25.5

2.2 BSI Assessment Team

Name	Role	Competency
Nanang Rusmana (NR)	Team Leader	Education: Holds a Bachelor Degree of Forestry, Bogor Agricultural University (IPB)
		Work Experience: 5 years working experience in palm oil industry as SHE Assistant at PT. Astra Agro Lestari Tbk. 3 years working experience in mining industry as Environment Coordinator and SHE Coordinator with PT. Kapuas Prima Coal Group. 6 years working experience as RSPO/ISPO auditor
		Training attended: Completed ISO 9001:2015 Lead Auditor Course, ISPO Auditor Course, ISO 14001:2015 Lead Auditor Course, ISO 45001:2018 Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, Endorsed RSPO Supply Chain Certification Lead Auditor Course, SMK3 Auditor Course, HCV Assessor Course, General OHS Expert Course, SMETA Requirements training.
		Language proficiency: Fluent in Bahasa Indonesia and English
		Aspect covered in this audit: During this assessment, he assessed on Best Management Practise for Mill and Estate, operation procedure, continuous improvement, long term business plan, time bound plan.



Mujinius Jalaraya (MJ)	Team Member	Education: Holds a Bachelor Degree majoring in Forest Resources Conservation and Ecotourism, Bogor Agricultural University (IPB).				
		Work Experience: 6 years working experience in palm oil plantations as SHE Assistant at PT. Astra Agro Lestari Tbk and Sustainability Supervisor at Teladan Prima Group. 8 years working experience as RSPO Auditor / Lead Auditor.				
		Training attended: Completed ISO 9001 Lead Auditor course, ISPO Lead Auditor course, Endorsed RSPO P&C Lead Auditor course, Endorsed RSPO SCCS Lead Auditor course, Introductory Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation, ISO 14001 Internal Auditor Training, ISO 45001 Lead Auditor course, OHS Expert Training, SMETA Requirements Training				
		Language proficiency: Fluent in Bahasa Indonesia and English				
		Aspect covered in this audit : During this assessment, he assessed on the aspects of OHS and supply chain for mill				
Edy Widodo (EW)	Team Member	Education: Holds a Bachelor Degree majoring Agricultural Technology from University of Padjadjaran, Bandung.				
		Work Experience: 8 years working experience in palm oil industry as Agronomist and Assistant Manager in various companies. 9 year working experience as RSPO/ISPO auditor.				
		Training attended: Completed ISO 9001 Lead Auditor Course, ISPO endorsed auditor course, Understanding ISO 14001 training, Auditing ISO 14001: 2004 training, Endorsed RSPO Supply Chain Certification Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, SMETA Requirements Training, Introductory Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation.				
		Language proficiency: Fluent in Bahasa Indonesia and English				
		Aspect covered in this audit: During this assessment, he assessed on the aspects of transparency, company policy, social and labor. He also conducted public consultation with related stakeholders.				
Eko Prastio Ramadhan (EPR)	Team Member	Education: Holds a Bachelor Degree in Forest Resources Conservation and Ecotourism from Forestry Faculty, Bogor Agricultural University (IPB).				
		Work Experience: Over 4 years of working experience in biodiversity officer with Birdlife Indonesia and consultant with PT Inoa Konsultindo. Over 2½ years of working experience in palm oil estate with PT Salim Ivomas Pratama Tbk and Capitol Plantation Group implementing sustainability. Over 4½ years of working experience as RSPO P&C Certification Program Manager and auditor covering standard such as RSPO P&C, RSPO SCCS, ISPO, ISO 9001 and ISO 14001.				
		Training attended: Completed ISO 14001:2015 Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, Social Impact Assessment Training, Endorsed RSPO SCC Auditor Lead Auditor Course, ISPO Auditor Batch 19 Training, ISO 9001 Lead Auditor Course and Identification of HCV Areas Training.				
		Language proficiency: Fluent in Bahasa Indonesia and English				
		Aspect covered in this audit: During this assessment, he assessed on the aspects of Environmental management and monitoring and HCV management and monitoring.				



Accompanying Persons:

Name	Role
NIL	-

1.3 Assessment Plan

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

Date	Time	Subjects	NR	МЈ	EW	EPR
Thursday, 26/05/2022	08.00 - 09.00	Opening Meeting - Presentation by PT IIS – Ukui II POM & Supply bases (Estate and Smallholder) - Presentation by BSI Indonesia	√	√	√	√
	09.00 - 12.00	Document Review				
		Ukui II POM & Estate (Soga Estate & Sei Lala Estate):				
		- Occupational Health and Safety, HCV, Environment Aspect, time bound plan.		√		√
		- Social Aspect and workers welfare, worker consultation, Stakeholder consultation, impact assessments, policies.			√	
		- Best Management Practice for Mill and supply chain for mill.	√		,	
		- Operation Procedure, organization commitments, Legal compliance, continuous improvement, long term business plan.			√	
	12.00 - 14.00	Break	√	√	√	√
	14.00 – 17.00	Audit Continue for document review Ukui II POM and Estate.	√	√	√	√
Friday, 27/05/2022	08.00 - 12.00	Audit Continue for document review Ukui II POM and Estate.				
	12.00 - 14.00	Break	√	√	√	√
	14.00 – 17.00	Audit Continue for document review Ukui II POM and Estate.				
Saturday,	08.00 - 12.00	Field Visit to Soga Estate:				
28/05/2022		 Herbicide application programmes, harvesting, fertilizing operations, water management, road maintenance, terracing, etc. 	√			
		- Agrochemical stores, Fertilizer store, workshops, housing, landfill, clinic, HCV, riparian zones, Hazardous Waste, waste management, etc.		√	_	
		- Boundaries inspection, worker interviews, social amenities, etc.			√	√
		- Interview with: Labor Union and Gender Committee.			\checkmark	



	12.00 - 14.00	Break	√	√	√	
	14.00 – 17.00	Field Visit to Ukui II POM: - Inspection of processing, warehouse, workshop, mill wastes management, effluent ponds, OHS, environment issues, POME application, workers interview, Supply Chain for CPO mill, review on SEIA documents and records, document review, etc. - Audit Supply Chain for CPO Mills (RSPO SCCS) - Interview workers.	√	√	√	√
Sunday, 29/05/2022	Off Work	Off Work	√	√	√	√
Monday, 30/05/2022	08.00 - 12.00	Field Visit to Sei Lala Estate: - Herbicide application programmes, harvesting, fertilizing operations, water management, road maintenance, terracing, etc. - Agrochemical stores, Fertilizer store, workshops, housing, landfill, clinic, HCV, riparian zones, Hazardous Waste, waste management, etc. - Boundaries inspection, worker interviews, social amenities, etc. - Interview with: Labor Union and Gender Committee.	√	√	√	V
	12.00 - 14.00	Break	√	√	√	√
	14.00 – 17.00	Audit Continue for document review Ukui II POM and Estate.	√	√	√	√
Tuesday, 31/05/2022	08.00 - 12.00	Field Visit to Scheme Smallholder Ukui II POM: KUD Tani Subur (20 sample) 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	Field Visit to Scheme Smallholder Ukui II POM: KUD Karya Tani (20 sample) 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.	√	V	√	√
Wednesday, 01/06/2022	08.00 - 12.00	Field Visit to Scheme Smallholder Ukui II POM: KUD Mekar Abadi (20 sample) 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	Audit Continue for document review Scheme Smallholder (KUD Tani Subur, KUD Karya Tani, KUD Mekar Abadi)	√	√	√	√
		Cooperative (KUD) document review, management of smallholder, Group Manager, BMP, OHS-EMS Implementation, HCV, Social and Labor, Continual improvement, etc.				
Thursday,	08.00 - 09.30	Report Preparation	√	√	√	\checkmark
02/06/2022	09.30 - 11.00	Closing Meeting	√	√	√	√



Section 3: Assessment Findings

3.1 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?	PT Inti Indosawit Subur has explained the certification plan for all of its subsidiaries; indicating all palm oil mills, company-owned estates and scheme smallholder as the supply base.	Complied
Have all the estates and mills certified within five (5) years after obtaining RSPO membership? If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021	There is remaining mill and estate that has not certified yet, PT Mitra Unggul Pusaka – Segati POM and supply bases (Segati Estate and Gonadai Estate). 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 planned for Re-Audit in year 2022, re-audit certification has conducted on 29 November – 3 December 2021 by TUV Rheinland. PT Mintra Unggul Pusaka - Penarikan Mill and Supply bases (Penarikan Estate) located in Pelalawan Riau planned for eaudit in year 2022, and re-audit certification has conducted on 29 November – 3 December 2021 by TUV Rheinland. For Bahilang Estate (Supply bases for Tanah Datar Mill) planned in year 2022 due to still in process of RACP (recertification 2020). Teluk Panjie Estate (801ha) as supply bases for Teluk Panjie Mill planned in 2022 due to HGU still in process. Sentral Estate (Supply bases for Gunung Melayu II POM planned in 2022 due to still in process of RACP (recertification 2020).	Complied
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available. If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021.	No, there is no new acquisition conducted by PT Inti Indosawit Subur and its subsidiary.	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	Yes, there is time bound plan revision dated 1 July 2021, signed by Management Representative. Justification available, it caused by status of disclosure PT MUP is in progress of	Complied



	rovious by DCDO, DT MUD will conduct to guidit in	
	review by RSPO. PT MUP will conduct re-audit in 2022.	
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?	Yes, there is time bound plan revision dated 1 July 2021, signed by Management Representative. Justification available, it caused by status of disclosure PT MUP is in progress of review by RSPO. PT MUP has undergo re-audit in Dec 2021.	Complied
Have there been any isolated lapses in implementation of the plan? If yes a Minor noncompliance 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 the plan? If yes a Major non-compliance shall be raised	No	Complied
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.	Based on Time Bound Plan revised 1 July 2021, PT Mitra Unggul Pusaka – Segati Mill located in Pelalawan, Riau Province postponed to Re-Audit in year 2021. Status of RaCP and relevant issues are still in progress and waiting for RSPO feedback. Company revised the Time bound plan on 1 July 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. 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 given the feedback and revision of Concept Note on 6 May 2021 and waiting for the review from RSPO secretariat. The company has sent an email to the RSPO Secretariat on 5 August 2022 and has been responded by RSPO Secretariat on 8 August 2022. The email from the RSPO Secretariat said that the RSPO Secretariat has received the additional document related to the draft agreement between PT MUP and CFES (Community Forest Ecosystem Services) and MoM on the initial communication between CFES and Kelompok Pengelola Hutan Adat (KPHA) Biang Sari related to location of remediation. And	Complied



	compensation panel along with the revised concept note.	
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	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. Latest progress of RaCP based on email	Complied
	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 given the feedback and revision of Concept Note on 6 May 2021 and waiting for the review from RSPO secretariat.	
	The company has sent an email to the RSPO Secretariat on 5 August 2022 and has been responded by RSPO Secretariat on 8 August 2022. The email from the RSPO Secretariat said that the RSPO Secretariat has received the additional document related to the draft agreement between PT MUP and CFES (Community Forest Ecosystem Services) and MoM on the initial communication between CFES and Kelompok Pengelola Hutan Adat (KPHA) Biang Sari related to location of remediation. And RSPO Secretariat will send the documents to the compensation panel along with the revised concept note.	
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.	According to internal audit result on December 2020 and September 2021, 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.	Complied
	According to the RSPO RaCP tracker (https://www.rspo.org/certification/remediation-and-compensation/racp-tracker) update 01 September 2022, PT Inti Indosawit Subur has:	
	MU's with potential liabilities: 4 units	
	LUCA Submitted (MUs): 4 units	
	LUCA review completed (MUs): 4 units	
	Concept Note required (MUs): 3 units	
	Concept Note submitted (MUs): 2 units Concept Note approved (MUs): 0	
	Concept Note approved (MUs): 0 Concept Note submitted (MUs): 0	
	Concept Note submitted (MUs): 0	



	 Concept Note endorsed (MUs): 0 Remediation Plan required (MUs): 4 units Remediation Plan submitted (MUs): 0 Remediation Plan approved (MUs): 0 	
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	Internal audit has conducted for Penarikan Mill on 20-25 June 2022, Bahilang Estate on 08-09 February 2022, Teluk Panji Estate on 18-23 February 2022 and Sentral Estate on 22-27 August 2022, there is no Labor disputes occur in this management unit. In addition the company has been certified for ISPO (Indonesian Sustainable Palm Oil) since December 2016.	Complied
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	Internal audit has conducted for Penarikan Mill on 20-25 June 2022, Bahilang Estate on 08-09 February 2022, Teluk Panji Estate on 18-23 February 2022 and Sentral Estate on 22-27 August 2022, there is no legal non-compliance occur in this management unit. In addition the company has been certified for ISPO (Indonesian Sustainable Palm Oil) since December 2016.	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.	Internal audit has conducted for Penarikan Mill on 28 January 2021, Bahilang Estate on 08-09 February 2022, Teluk Panji Estate on 18-23 February 2022 and Sentral Estate on 18-19 September 2021. 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, 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 (Penarikan Mill on 28 January 2021, Bahilang Estate on 08-09 February 2022, Teluk Panji Estate on 18-23 February 2022 and Sentral Estate on 18-19 September 2021), stakeholders consultation already conducted. There is no issue.	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?		Complied			





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.	



Approved Time Bound Plan

Name of Mill	Mill Address	Name of Supply Bases	Estate Address	Time Bound for Certification	Status
Buatan I Mill – PT Inti Indosawit Subur	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau	Buatan Estate	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau	2010	Certified on 16 September 2010 Re-Certified on 16 September 2015
	Regency, Riau	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	Simpang Perak Estate*	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau	2010	Certified on 16 September 2010 Re-Certified on 16 September 2015
	Regency, Riau	Buatan (Plasma)	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau		*Split From Buatan Estate Since 1 January 2019
Ukui I Mill - PT Inti Indosawit Subur	Ukui Village, Ukui District, Pelalawan Regency, Riau	Ukui Estate	Ukui Village, Ukui District, Pelalawan Regency, Riau	2011	Certified on 1 March 2011 Re-Certified on 1 March 2016
		Sei Lala Estate*	Ukui Village, Ukui District, Pelalawan Regency, Riau	2011	*Split From Ukui & Soga Estate Since 1 January 2019
		Ukui (Plasma)	Ukui & Lubuk Batu Jaya District, Pelalawan & Inhu Regency, Riau	2011	Certified on 1 March 2011 Re-Certified on 1 March 2016
Ukui II Mill - PT Inti Indosawit Subur	Ukui Village, Ukui District, Pelalawan Regency, Riau	Soga Estate	Ukui Village, Ukui District, Pelalawan Regency, Riau	2011	Certified on 1 March 2011 Re-Certified on 1 March 2016
		Ukui (Plasma)	Ukui & Lubuk Batu Jaya District, Pelalawan & Inhu Regency, Riau	2011	Certified on 1 March 2011 Re-Certified on 1 March 2016
Tungkal Ulu Mill - PT Inti Indosawit Subur	Pulau Pauh / Penyabungan / Merlung Village, Tungkal Ulu	Tungkal Ulu Estate	Pulau Pauh / Penyabungan / Merlung Village, Tungkal Ulu	2012	Certified on 15 August 2012 Re-Certification on August 2017



	District, Tanjung Jabung Regency,		District, Tanjung Jabung Regency, Jambi		
	Jambi	Tungkal Ulu (Plasma)	Renah Mendalo, Merlung, Muara Papalik District, Tanjung Jabung Barat Regency,	2012	Certified on 15 August 2012 Re-Certification on August 2017
Muara Bulian Mill - PT Inti Indosawit Subur	Singoan / Bukit Sari / Bulian Jaya Village, Muara Bulian / Pemayung District, Batang	Muara Bulian Estate	Singoan / Bukit Sari / Bulian Jaya Village, Muara Bulian / Pemayung District, Batang Hari Regency,	2013	Certified on 12 July 2013 Re-Certification on August 2017
	Hari Regency, Jambi	Muara Bulian (Plasma)	Maro Sebo Ilir District, Batanghari Regency, Jambi	2013	Certified on 12 July 2013 Re-Certification on August 2017
Topaz Mill – PT Tunggal Yunus Estate	Petapahan Village, Tapung District, Kampar Regency, Riau	Topaz Estate	Petapahan Village, Tapung District, Kampar Regency, Riau	2015	Certified on 30 March 2015
Taman Raja Mill – PT Dasa Anugrah Sejati	Lubuk Bernai / Kampung Baru / Pelabuhan Dagang / Pematang Pauh Vilage, Tungkal Ulu District, Tanjung Jabung Regency, Jambi	Taman Raja, Badang & Bernai Estate*	Lubuk Bernai / Kampung Baru / Pelabuhan Dagang / Pematang Pauh Vilage, Tungkal Ulu District, Tanjung Jabung Regency, Jambi	2015	Certified on 20 February 2015 *Bernai Estate Split From Taman Raja & Badang Estate Since 1 January 2019
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	Re-audit in 2022	Re-Audit Certification on 29 November - 3 December 2021 by TUV Rheinland.
		Gondai Estate	Pangkalan Sarik / Baru Village, Langgam / Siak Hulu District, Pelalawan / Kampar Regency, Riau	Re-audit in 2022	Re-Audit Certification on 29 November - 3 December 2021 by TUV Rheinland.
Penarikan Mill – PT Mitra Unggul Pusaka	Penarikan Village, Langgam District, Pelalawan Regency, Riau	Penarikan Estate*	Penarikan / Tambak Village, Langgam District, Pelalawan Regency, Riau	Re-audit in 2022	Re-Audit Certification on 29 November - 3 December 2021 by TUV Rheinland.



	1				1
Tanah Datar Mill – PT Supra Matra Abadi	Tanah Datar Petatal Village, Talawi District, Asahan Regency,	Tanah Datar Estate	Tanah Datar Petatal Village, Talawi District, Asahan Regency, North Sumatera	2015	Certified on 18 May 2015
	North Sumatera	Bahilang Estate	Bahilang Village, Tebing Tinggi District, Serdang Bedagai Regency, North Sumatra	2022	*Bahilang Estate On Process RaCP (Recertification 2020)
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	2015	Certified on 6 March 2015
Teluk Panjie Mill – PT Supra Matra Abadi	Teluk Panjie Village, Kampung Rakyat District, Labuhan Batu	Teluk Panjie Estate (3,885 Ha)	Teluk Panjie Village, Kampung Rakyat District, Labuhan Batu Regency, North Sumatra	2015	Certified on 21 April 2015
	Regency, North Sumatra	Teluk Panjie Estate (801 Ha)		2022	HGU is still in Process
Peranap Mill – PT Rigunas	Simelinyang / Pauh Ranap / Sengkilo	Peranap Estate	Simelinyang / Pauh Ranap / Sengkilo Village,	2015	Certified on 7 January 2015
Agri Utama	Village, Peranap District, Indragiri Hulu Regency, Riau	Peranap (Plasma)	Peranap District, Indragiri Hulu Regency, Riau	2016	Certified on 18 August 2016
Bungo Tebo Mill – PT Rigunas Agri	Tuo Sumai / Sungai Rambai Village, PWK	Bungo Tebo Estate	Tuo Sumai / Sungai Rambai Village, PWK Sumai / Tebo Ulu	2015	Certified on 3 December 2015
Utama	Sumai / Tebo Ulu District, Bungo Tebo Regency, Jambi	Bungo Tebo (Plasma)	District, Bungo Tebo Regency, Jambi	2017	Certified on 7 February 2017
Tanjung Selamat Mill — PT Indo Sepadan Jaya	Kampung Padang Village, Bilah Hilir District, Labuhan Batu Regency,	Tanjung Selamat	Kampung Padang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	2015	Certified on 26 May 2015
	North Sumatra	Pangkatan	Sennah Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	2015	Certified on 26 May 2015
Gunung Melayu I – PT Saudara Sejati Luhur	Rahuning Village, Bandar Pulau District, Asahan	Pulau Maria Estate	Rahuning Village, Bandar Pulau District, Asahan Regency, North Sumatra	2015	Certified on 7 September 2015
			·	·	



	Regency, North Sumatra				
Gunung Melayu II – PT Gunung Melayu	Melayu II – PT Village, Bandar & Batu Bandar Pulau District, Gunung Pulau District, Anam Asahan Regency, North	2015	Certified on 8 July 2015		
	North Sumatra	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	2016	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	2018	HGU Complete Audit at ASA 3
		Aek Kuo (501 Ha)	Batu Regency, North Sumatra 2018		(2018)
Negri Lama I Mill – PT Hari Sawit Jaya	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	*3rd party which is excluded from scope of certification	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	2015	 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 is 1 (one) Minor nonconformities. The PT Inti Indosawit Subur – Ukui II POM Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment. The implementation of the Corrective Actions for the 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.

aring this assessment				
Non-conformity				
NCR Ref #	2206497-202205-N1	Issued Date	02/06/2022	
Due Date	Next audit	Closure Date	Next audit	
Indicator & Category (Critical / Minor)	RSPO INA NI 2020, Clause	5.7.2		
Statement of Nonconformity:	The organization have an emergency procedures but its implementation is inconsistent			
Requirement Reference:	Accident and emergency procedures in Indonesian language are in place and clearly understood by all workers. Assigned operatives trained in first aid are present in both field and other operations. First aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.			
Objective Evidence:	 harvester gets bitten by Fire extinguisher in Mill expired on 22 July 2021 Fire extinguisher in Cli monitoring checklist. Eye wash and handwash properly. 	Workshop was not monitored	d regularly and has been expired and there is no Estate were not function	
Corrections:	 Carried out the directions/socialization to the supervisor related to the importance of first aid in the event of a venomous animal attack (snake) Replace the fire extinguisher with one that is in good condition Open the main faucet to ensure water supply Install the emergency procedures in agrochemical warehouses. 			
Root Cause Analysis:	 The supervisor's knowledge is still lacking in understanding first aid if attacked by a venomous animal (snake). The PIC has not checked according to the monitoring checklist of fire extinguisher. 			



	 The auditee did not know of the existence of the main faucet of the water channel leading to the eye wash and hand wash, at the time of the verification the main faucet was in the off position so there was no water flow. The emergency procedure in agrochemical warehouse is in the process of being replaced because it is in an outdated condition and needs to be replaced 	
Corrective Actions:	 PIC conducts monitoring every 3 months regarding the supervisor's knowledge in understanding first aid if attacked by a venomous animal (snake). PIC conducts routine fire extinguisher monitoring and make sure the fire extinguisher condition according to the checklist. PIC conducts routine monitoring related the presence and readiness of emergency response equipment (eye wash and handwash at fertilizer Warehouse Soga Estate). PIC conducts routine monitoring regarding the presence of the emergency procedure in agrochemical warehouse. 	
Assessment Conclusion:	The effectiveness of the CAP will be verified in the next surveillance audit.	

Opport	Opportunity for Improvements		
OFI#	Description		
OFI 1	Nil		

Positiv	Positive Findings		
PF#	Description		
PF 1	Nil		

3.3.1 Status of Nonconformities Previously Identified and Observations

Non-conformity				
NCR Ref #	2040085-202103-M1	Issued Date	27 March 2021	
Due Date	27 June 2021	Closure Date	25 June 2021	
Indicator & Category (Critical / Minor)	RSPO INA NI 2020, Clause 6.2.7 minor (Escalated to Major NC)			
Statement of Nonconformity:	During audit temporary workers remain employed as a core work (harvesting and mill process), program to promote casual workers as permanent workers was not run accordingly.			
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:	- Sei Lala Estate:			



	PHL workers promotion program has been determined to promote 15 casual (PHL) workers to become permanent workers in a year, however the actual promotion is only 12 casual workers. In addition during 2021 there was a new recruitment of 32 casual workers. Based on database there are remain 83 casual workers for harvesting. - Soga Estate PHL promotion program has been determined to promote 10 casual (PHL) workers to become permanent workers in a year, however in 2021 there was a new recruitment of 13 casual workers for harvesting. Based on database there was still 74 of casual workers for harvesting - Ukui II POM Based on database there was still 13 of casual workers for mill processing that has
	not been promote to become permanent workers.
Corrections:	- Make a memorandum of the temporary (PHL) workers to become permanent (SKU) workers as part of the company's commitment.
	- Monitor and evaluate the annual appointment program.
	 Ensure the use of temporary workers in accordance with labor regulations and are not fully employed for harvesting activities (during peak season/additional workers) but also employed for other jobs.
Root Cause Analysis:	- The program for the appointment of PHL employees to SKU has not previously been analyzed, monitored and evaluated in accordance with the needs of the workforce ratio for core work.
	- Since pandemic covid-19 circumstances 2020 has quite an effect on the company's financial condition and has an effect on the employee recruitment program.
	- Turnover of workers was high due to the condition of old plants with a fairly high level of difficulty in harvesting on high trees.
Corrective Actions:	- Make a memorandum of the temporary (PHL) workers to become permanent (SKU) workers as part of the company's commitment.
	- Monitor and evaluate the annual appointment program.
	- Ensure the use of temporary workers in accordance with labor regulations and are not fully employed for harvesting activities (during peak season/additional workers) but also employed for other jobs.
Assessment Conclusion:	- PT Inti Indosawit Subur – Ukui II POM has analyzed the needs of the workforce ratio for core work, particularly for harvesting and mill processing. According to ratio for core work, company has determined the needs of workers for harvesting as below: <u>Sei Lala Estate</u>
	Mature plantation: 2,553 ha, workers needs 128, existing permanent workers 54, temporary workers 74, plan for promotion 74 workers. Soga Estate
	Mature plantation: 2,926 ha, workers needs 146, existing permanent workers 55, temporary workers 91, plan for promotion 91 workers. <u>Ukui I POM</u>



Workers needs 104, existing permanent workers 87 workers, temporary workers 17, plan for promotion 17 workers.

- PT Inti Indosawit Subur – Ukui II POM has coordinate with the Department of Manpower regarding the PHL appointment program and make a program for the gradual appointment of temporary (PHL) workers. PT Inti Indosawit Subur – Ukui II POM has made the promotion program for Temporary workers to become permanent workers. The program was made with timeframe 5 years for Soga and Sei lala Estate and 3 years for Ukui II POM according to the company's ability. This has also been consulted by the company with the manpower department. This 5-year worker promotion program has been known and approved by the Manpower Office Pelalawan Regency.

During NCR Close out, interview with Manpower Office (Head of industrial relations and work requirements) confirmed that they have approved the workers promotion program by PT Inti Indosawit Subur – Ukui II POM; this has been calculated according to the company's ability and does not violate labor regulations.

Evidence of Permanent workers promotion program are available as per:

- ✓ Program Promosi Pemanen PHL Ke SKU-H Kebun Soga (KSA). There are 91 temporary workers will promote to become permanent workers. In 2021 semester I will promote 14 workers and semester II will promote 4 workers. In 2022 until 2025 will promote 73 workers.
- ✓ Program Promosi Pemanen PHL Ke SKU-H Kebun Sei Lala (KSL). There are 74 temporary workers will promote to become permanent workers. In 2021 semester I will promote 7 workers and semester II will promote 7 workers. In 2022 until 2025 will promote 60 workers.
- ✓ Program Promosi PHL Ke SKU-H Pabrik Ukui Dua (PUD). There are 17 temporary workers will promote to become permanent workers. In 2021 semester I will promote 3 workers and semester II will promote 4 workers. In 2022 until 2023 will promote 10 workers.
- PT Inti Indosawit Subur Ukui II POM (HR Ops Manager) has propose and appoint temporary (PHL) workers for phase 1 (attached timeline) according to the 2021 program. This was stated in "Timeline Pengangkatan SKU-H Karyawan Panen & Pabrik Ukui Group". According to timeline 2021 for promotion of temporary workers to permanent workers, company has determined the step process for promotion:
 - ✓ Administration and personalia document submission (1 3 July 2021). Company has prepare and collect all administration and personal document for 18 temporary workers to promote. Evidence of administration preparation and collection can be demonstrated during audit.
 - \checkmark Selection of administration and personalia (5 6 July 2021). Selection will be conducted based on Recruitment procedure.
 - ✓ Medical Checkup (7 10 July 2021). MCU will conducted as one of recruitment process requirement. MCU will be conducted by company doctor and cooperated with external laboratory.



	 ✓ Evaluation (12 – 15 July 2021). Evaluation conducted for selection process before appointment.
	 ✓ Appointment of SKU based on evaluation (16 July 2021). PT Inti Indosawit Subur – Ukui Group has issued the Memorandum regarding temporary (PHL) labor regulation. Memorandum has been made as per "Memorandum No. GM-KUK/MEMO/06/21" June 2021. The memorandum stated that temporary workers shall be regulate to use not only for harvesting but will be use for another supporting jobs such as: upkeeping, pruning, EFB application). Estate manager and assistant will be monitor the temporary workers usage in accordance with labor regulation.
	 Monitoring of temporary workers promotion will be conducted each semester according to timeline and program of PHL promotion.
	 PT Inti Indosawit Subur – Ukui Group will ensure the use of temporary workers in accordance with labor regulations and are not fully employed for harvesting activities (during peak season/additional workers) but also employed for other jobs. It was also refer to Memorandum issued by company as per "Memorandum No. GM-KUK/MEMO/06/21" June 2021.
	Company will evaluate the load work in the old plantation for harvester. Basis of FFB harvesting in old plantation has been determined by Ukui Group in accordance with harvester average ability. Currently company also has implementing replanting program. Replanting has been running since 2017 and will be finished on 2027. Currently Sei Lala Estate has done replanting for \pm 495 ha and Soga Estate will be start replanting on 2022.
Effectiveness Closure (for previous audit closed Critical NC):	Non Conformity has been Closed on 25 June 2021.

Non-conformity			
NCR Ref #	2040085-202103-N1	Issued Date	27 March 2021
Due Date	27 June 2021	Closure Date	27 May 2022
Indicator & Category (Critical / Minor)	RSPO INA NI 2020, Clause 7.3.2 (minor)		
Statement of Nonconformity:	During audit found that disposal of domestic waste was not consistent with waste management plan		
Requirement Reference:	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.		
Objective Evidence: PT Inti Indosawit Subur – Ukui Group has a waste management plan, ident type and source of waste and the disposal A documented waste management plan to avoid or reduce pollution an implementation available under document of Environmental Aspect-Im (Evaluasi Aspek-Dampak Lingkungan) year 2020. However, based on field visit in landfill in Soga Estate (dated 23 rd March 2021 Division 1), It was found that disposal of domestic waste was done by open		the disposal plan. reduce pollution and its namental Aspect-Impacts ared 23 rd March 2021,	



	dumping not by landfill system, it was not consistent with waste management plan.
Corrections:	Soga Estate Immediately made the trash hole in the area of landfill/domestic waste disposal site. The domestic waste exist upper the ground immediately evacuate to the trash hole provided.
Root Cause Analysis:	Soga Estate has a landfill system, however the available trash hole is full and closed so that the domestic waste temporary collect upper the ground/open dumping.
Corrective Actions:	Monitoring the domestic waste handling and monitor the landfill area to ensure that if the trash hole has been full and immediately closed and made the new trash hole. Provide the sufficient domestic hole (2 domestic hole) in each estate to cover organic and inorganic domestic waste.
Assessment Conclusion:	Field visit has conducted at Soga Estate, the trash hole in the area of landfill/domestic waste disposal site has already available during audit. The trash hole was made sufficient (2 domestic hole) to cover organic and in organic waste. Monitoring the domestic waste handling and monitoring the landfill area has shown during the audit.
Effectiveness Closure (for previous audit closed Critical NC):	Non Conformity has been Closed on 27 May 2022

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1412038M1	MAJOR	4.6.5	1-11-2016	Closed. 31-01-2017
1412038M2	MAJOR	4.7.2	1-11-2016	Closed. 31-01-2017
1412038M3	MAJOR	4.4.2	1-11-2016	Closed. 31-01-2017
1412038N1	minor	4.7.6	1-11-2016	Closed. 21-12-2017
1569381-201712-M1	MAJOR	4.7.1	21-12-2017	Closed. 13-02-2018
1569381-201712-M2	MAJOR	6.1.3	21-12-2017	Closed. 13-02-2018
1569381-201712-N1	Minor	5.1.3	21-12-2017	Closed. 19-12-2018
1569381-201712-N2	Minor	5.2.4	21-12-2017	Closed. 19-12-2018
1569381-201712-N3	Minor	5.4.1	21-12-2017	Closed. 19-12-2018
1722078-201812-M1	MAJOR	4.7.2	22 Dec 2018	Closed. 13-02-2019
1722078-201812-M2	MAJOR	3.2.ii)	22 Dec 2018	Closed. 13-02-2019
		General CoC requirements for the supply chain.		



		1	T	
1722078-201812-M3	MAJOR	5.8.2 General CoC requirements for the supply chain.	22 Dec 2018	Closed. 13-02-2019
1722078-201812-M4	MAJOR	5.13.2 General CoC requirements for the supply chain.	22 Dec 2018	Closed. 13-02-2019
1722078-201812-M5	MAJOR	5.13.3 General CoC requirements for the supply chain.	22 Dec 2018	Closed. 13-02-2019
1722078-201812-N1	Minor	4.7.5	22 Dec 2018	Closed on 14 Dec 2019
1722078-201812-N2	Minor	4.7.7	22 Dec 2018	Closed on 14 Dec 2019
1722078-201812-N3	Minor	5.3.3	22 Dec 2018	Closed on 14 Dec 2019
1861406-201911-M1	Critical	3.6.2	14 Dec 2019	Closed on 20 Dec 2020
1861406-201911-M2	Critical	5.3.2	14 Dec 2019	Closed on 20 Dec 2020
1861406-201911-M3	Critical	5.6.1	14 Dec 2019	Closed on 20 Dec 2020
1861406-201911-M4	Critical	4.1.1	14 Dec 2019	Closed on 20 Dec 2020
1861406-201911-M5	Critical	4.2.1	14 Dec 2019	Closed on 20 Dec 2020
1861406-201911-M6	Critical	6.7.3	14 Dec 2019	Closed on 20 Dec 2020
1861406-201911-N1	Minor	6.2.7	14 Dec 2019	Escalated to Major NC
2040085-202103-M1	Critical	6.2.7	27 Mar 2021	Closed on 25 Jun 2021
2040085-202103-N1	Minor	7.3.2	27 Mar 2021	Closed on 27 May 2022
2206497-202205-N1	Minor	6.7.2	02 June 2022	Next audit

3.4 Stakeholders and previous land owner / user consultation

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss PT Inti Indosawit Subur – Ukui II Palm Oil Mill Certification Unit's environmental and social performance, legal and any known dispute issues.

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

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of 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)			
Department of Environment, Pelalawan Regency	Mr Febrian	By phone			
Department of Plantation, Pelalawan Regency	Mr Zulkarnain	By phone			
Department of Manpower, Pelalawan Regency	Mr Syamsul Alam	By phone			
Land Department, Pelalawan Regency	There is no response	There is no response			
Workers of PT Inti Indosawit Subur – Ukui II POM	Workers during field visit	Face to face interview			
Secretary of Gender Committee Sei Lala Estate	Mrs Anisa	Face to face interview			
Secretary of Gender Committee Soga Estate	Mrs Efa Kurnia	Face to face interview			
Chairman of Labor Union – KSPSI Soga Estate	Mr Zaina Arifin Hargan	Face to face interview			
Head of Sungai Air Hitam Village	Mr Pai	Face to face interview			
NGO - LSM Forum Peduli Masyarakat Pribumi/ ORMAS Persatuan Batak Bersatu	Mr Heru Setiawan Sembiring	Face to face interview			

Stakeholders comment

1 Department of Plantation, Pelalawan Regency Feedbacks:

- PT Inti Indosawit Subur Ukui Group 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 2022".
- 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 company.
- 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 Ukui I and II Group 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.
- There are rumors circulating that there are 2 options for plasma farmers of PT IIS Ukui group regarding the replanting program to be implemented, namely: partnership scheme smallholder (Plasma) and selfmanagement (independent).



Audit Team verification and response:

Company acknowledge the comment from Plantation Agency.

- Related to the Replanting Scheme smallholder Ukui Group Program:
 - There are about 422 hectares of oil palm plantations that will be uprooted and replanted with Topaz superior oil palm seeds. The KUD Sumber Bahagia oil palm replanting program received support from Asian Agri through its business unit PT Inti Indosawit Subur Ukui Plasma Plantation.
- The replanting of KUD Sumber Bahagia phase 1 also managed to get funding for oil palm replanting from BPDPKS (Badan Pengelola Dana Perkebunan Kelapa Sawit-Palm Oil Plantation Fund Management Agency) IDR 25,000,000/ha with an area of 410 Ha
- There are 2 replanting schemes; namely partnering with companies which are partnership schemes (Plasma) and self-help schemes (independent). PT IIS - Ukui Group as coach of the farmers oil palm, his party continues to facilitate whatever farmers choose through deliberation between members through the KUD forum.

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

Farmers who carry out replanting independently will be excluded from the scope of this certification, because in their operations the farmers carry out activities independently and do not cooperate with PT IIS.

The replanting program in scheme smallholder-Plasma will be verified at the next audit.

2 Department of Manpower, Pelalawan Regency Feedbacks:

- Generally, PT Inti Indosawit Ukui Group has built good communication with Manpower and Transmigration Office – Pelalawan Regency.
- PT Inti Indosawit Subur Ukui Group has complied well with legislation related to employment, i.e.;
 - 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.

Audit Team verification and response:

The company has taken action in accordance with well-established procedures and persuasive approach, so there is no turmoil / issue.

3 Environmental Office, Pelalawan Regency Feedbacks:

- The company has established good communication and delivered periodic environmental management.
- Company has revised the AMDAL document and report to Environmental Agency.



- 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 Ukui 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.
- For 2021-2022 period there is no environmental issues either received directly, from the community around the plantation or other community social institutions.

Audit Team verification and response:

Company acknowledge the comment from Plantation Agency as positive responses. The company will always foster relationships and communication. The mandatory semester and 3-month reporting has been carried out in accordance with applicable regulations. Consultations related to environmental management are always carried out

As a positive response from DLH, environmental management has been carried out well. The auditor will always verify in the field related to environmental management that has been carried out by the company in the next audit.

4 NGO - LSM Forum Peduli Masyarakat Pribumi & also as member of ORMAS Persatuan Batak Bersatu

Feedbacks:

- LSM Forum Peduli Masyarakat Pribumi is a Community Social Institution that always monitors the activities
 and impacts of the operational process that carried out by the company, including PT IIS Ukui Group.
 The monitoring that has been be carried out is related to environment and social community management.
- In period 2021 2022 (until April 2022) there is no issue related to environment and social community.
- Environment management carried out by PT IIS Ukui Group has been implemented properly. There is no report from the community related to the environment impacts.
- CSR program has been implemented in accordance with the mutually agreed program.

Audit Team verification and response:

- It is a positive response, PT IIS will always coordinate with local NGOs to get positive input.
- The preparation of the CSR program, through the public relations staff of PT IIS-Ukui Group, has consulted with the villages surrounding the plantation through MUSREMBANG Desa (Musyawarah Pengembangan Desa) which is carried out every year. Consultations with surrounding village communities were carried out in January 2022 to establish CSR programs for the 2022 period.
- In 2021-2022 period, the company has established CSR program is recorded on CSR Project Tracking 2021-2022, consisting 6 types of activities, such as Social, Economy, Education, Health, Infrastructure and Environment

5 Head of Sungai Air Hitam Village Feedbacks:

- Generally, the communication between the village government or local community and company has going well.
- The company has always responded to each problem or issue submitted by government officials from village and surrounding communities.



- The Company has realized a CSR program to the local community and involve them in the CSR program planning process in each village. However, need more intensive communication to make it harmonize with ADD (Anggaran Dana Desa) program.
- Surrounding communities feels positive due to benefits from the presence of the company, for the maintenance of road infrastructure, public health, education and community economic development (trainings on productive enterprises).
- There was no report from the community working in the company related to forced labor practices by the company.
- Until May 2022, there are no reports or issues from the community related to land conflicts. Employees working at PT IIS (Ukui Group) have received the wages as determined by the government.
- Communities has understood the rules of the company prohibiting the acceptance of underage workers / child laborers.
- Maintenance transport access roads for transportation of FFB and CPO.

Audit Team verification and response:

- The company has made a road maintenance program through CSR programs that are conducted twice a year.
- Maintenance of this road consists of the formation of roads, hardening using rock and road compacting.
 For example: on August 9, 2021, Providing Assistance in the use of grader and compactor heavy equipment to Bagan Limau Village and Sungai Air Hitam Village.
- Access road maintenance FFB and CPO carried out scheduled, every 4 months once done using heavy equipment (motor grader) good maintenance or hoarding the road and compacter. In the dry season done watering the road every day (in the morning and evening).

6 Secretaries of Gender Committee of Sei Lala Estate

Chairman of Labor Union of PUK SPPP.KSPSI

Workers of PT Inti Indosawit Subur – Ukui II POM and Supply Bases

Feedbacks:

- The Company has realized Normative Rights of employees such as remuneration in accordance with applicable regulations, Allowance/THR, BPJS Program.
- Legally SPSI members is a labor consist of SKU labor and also staff however operationally Labor Union of PUK SPPP.KSPSI also consider the problems that occur at the level of non permanent workers/PHL.
- Non permanent workers has had a Labour Agreement (SPK) with the company.
- Performance appraisals are conducted once a year as management considerations for evaluation, promotion and rotation.
- There is no indication that the company conducted discrimination against its workers.
- The company has provided Personal Protective Equipment (PPE) for all workers.
- The company has providing facilities for employees adequately for example housing, water, electricity, toilets, Sanitation, School Bus, clinics, places of worship.
- The Company has registered all the workers in BPJS program (Employment and Health BPJS) including PHL (non-permanent employees).
- Up to now, there has never happened employees demonstration to the company management.
- The Company has provided wages in accordance with existing regulations.
- There is no indication of the company in violation of Human Rights.
- There is no indication of forced or coercive labor practice of work.

Audit Team verification and response:

For the positive things that have been done will be maintained and improved by the management to be better



in the future.

The company has maintained good management of occupational and social policy, all feedback from workers union are positive as well as previous assessment, audit team acknowledge the positive feedback.

List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)		Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
NIL					

PT Inti Indosawit Subur – Ukui I POM has established since 1985 and has planting palm oil since 1987, 1988, 1989. Currently the palm oil has been replanting since 2017 – 2027.

Previou	s land owner / user comment
-	Feedbacks: NIL
	Audit Team verification and response: NIL

3.5 Impartiality and conflict of interest

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



Formal Signing-off of Assessment Conclusion and Recommendation

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

remain cordinati	
Report prepared by	Acceptance of Assessment Conclusion
Name: Nanang Rusmana	Name: Putu Ghryate Yonata Aksa
Company Name On behalf of BSI Services Malaysia Sdn. Bhd.:	Company Name: PT Inti Indosawit Subur – Ukui II POM
Title: Client Manager	Title: Sustainability Coordinator
Signature:	Signature: (I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)
Date: 25 August 2022	Date: 10 September 2022

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Appendix A: Summary of Findings

Criterio	n / Indicator	Assessment Findings	Compliance
_	e 1: Behave ethically and transparently ical business behaviour, build trust and transparency with stakeholders to	ensure strong and healthy relationships.	
	1.1: The unit of certification provides adequate information to relevant stars and forms to allow for effective participation in decision making.	keholders on environmental, social and legal issues relevant to RSPO Criteria	a, in appropriate
1.1.1	(C) Management documents that are specified in the RSPO P&C are made publicly available.	Company has a set of publicly available document in form of "Daftar Dokumen dan Informasi Untuk Diakses Publik PT Inti Indosawit Subur" updated on January 2022. The provision of publicly available document segregates based on stakeholder category: Government, community and NGO: AMDAL document, RKL/RPL report, Social Impact Assessment, HCV identification and monitoring report, land permit (Izin Lokasi – location permit, Izin Prinsip – principle permit, HGU/land title certificate), environmental permit, palm oil mill machinery permits and licenses, safety committee report, plantation business progress report, conservation management plan document, environmental management program, corporate social responsibility/CSR documents, FFB price, forest and land firefighting report, ground water use report, tax and retribution payment documents, radio station permit, company policies, continuous improvement program, social procedures, hazardous waste handling report, POME land application permit and report, manpower report, employee's medical checkup result, physical and chemical analysis of river water, land compensation report, public summary report. A number of documents are determined to be available for public (e.g.: Government, local communities, NGO and public figure), with approval from management: • Report on the Implementation of the RKL-RPL every 6 months (environmental management and monitoring report);	

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- Report on B3 waste balance every 3 months (hazardous waste balance report);
 - Social Impact Assessment (SIA)
- HCV identification report
- Company Policy (e.g.: Human Rights, manpower policy including health and safety policy, etc.)
- CSR annually report
- Reports of liquid and solid waste every 3 months (solid and liquid waste report);
- Report on the use of surface and underground water every once a year (Underground and surface water usage report);
- P2K3 report every 3 months period (health and safety report);
- Mandatory Report
- Manpower report once a year (manpower report);
- Plantation business progress report every 1 year period (plantation business progress report);
- Reports on the results of high conservation value monitoring (high conservation value monitoring report);
- Report on monitoring and preventing land fires every 6 months (land fire monitoring and prevention activity report);
- Employee's medical checkup result;
- Report on air emissions (air emission test report);
- Report on river physical and chemical analysis (river water's physical and chemical test results);
- Public Summary Report of RSPO and ISPO

Scheme Smallholder:

		The Smallholder Manager has determined type of documents which can be accessed by public as "Daftar Dokumen yang Dapat Di Akses (tahun 2022" updated on 4 January 2022, that covers: Copies of Sertifikat Hak Milik (SHM) – and ownership certificate. Group working Program HCV Standard Operational Procedure of Good Agriculture Practices. Social Impact Assessment (SIA) ICS Policy including Human rights policy, man powering, health and safety etc. Social Activity Documents including CSR Report.	
		 Local Development Documents. Prices of Fresh Fruit Bunches Public Summary Report of RSPO 	
		RAT document of Cooperative	
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders.	PT Inti Indosawit Subur – Ukui Group has had list of information and listed in "Daftar Dokumen dan Informasi untuk Diakses Publik PT Inti Indosawit Subur - Ukui II" has established on January 2022, there are 32 type of document of information, including:	Complied
		1. Land titles/user rights (Izin Lokasi, Izin Prinsip, IPKH, Sertifikat HGU, HGB and IMB)	
		2. 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)	
		4. 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)
- 6. Details of complaints and grievances (Procedure of Information handling, Procedure of "keluhan konfik 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)/Whistle-blowers and has been dissemination to all operation at workplace on 3-7 February 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 In 2022, dissemination has performed on 3 February 2022 attended by 32 personnel from Sei Lala Estate on 19 March 2022 attended by 72 personnel at Soga Estate. List of attendance was available during audit.

Scheme Smallholder:

Plasma Ukui II has a list of documents that can be access by Stakeholder updates as of January 2022. 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:

• 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 konfik 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.	The company has established procedure to handle stakeholder information request in "SOP Penanganan Permintaan Informasi Stakeholder" (SOP No. AA-GL-5008.1-RI, Rev. 1) dated 22 August 2011. The procedure described that information request can be receive by oral or written, or by representative of communities; the company will responded according to respective authorities, starts from Humas (public relation), Estate/Mill manager, Group Manager and Regional Office. The company has set time to respond information request, it is 14 working days.	Complied



Record of information request and response/information logbook is maintained by company. Records of information are kept for minimum three (3) years. Below are seen and verified Sample:

- P2K3 Activities Report (Safety Committee report) Ukui I and II Palm Oil Mill Period Jan - March 2022 PT Indosawit Subur Ukui Group, sent to Manpower Agency of Riau Province on 26 April 2022.
- Report on Environment Management and monitoring (UKL-UPL) Measuring Palm Oil Mill I and Mil II, period July – December 2021, sent to the Environment Agency of Pelalawan Regency. on 26 April 2022.
- Request for information from Head of Kampung Baru Village on 15 January 2022 by letter no. 006/Pemdes-KB/I/2022 related request for discussion Related to TKD (Tanah Kas Desa) and CSR cooperation and has responded on 15 January 2022 by Humas-Public Relations.
- Request for information from from Head of Kampung Baru Village on 18 April 2022 by letter no. 031/PEMDES/KB/IV/2022 related Requests for assistances of the coral stone procurement and has been responded by Humas on 18 April 2022.
- A request for information from SDN 014 Silikuan Hulu, Subdistrict of Ukui on 22 April 2022 through letter no. 02/SD/014/IV/2022/16, concerning: The loaning proposal great tools and has been responded to on 22 April 2022.

Ukui Smallholder:

All information request were documented in Logbook of "*Catatan Permintaan Informasi dan Tanggapan*", up to April 2022, there were 12 information request, e.g.:

Request for information from the Chairman of the Farmer Group (KT

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RSPO P&C Public Summary Report Revision 13 (Apr 2022)

		 226 – KUD Karya Tani) and WKAK on February 14, 2022 about the status of oil palm pest attack (eat leaf caterpillar), has been responded to on February 16, 2022 by providing instructions for pest spray application by using Furadan at the circle of oil palm tree. Request for information from Head of Sei Beras Village on 28 April 2022, letter no. 140/2006/063 related to requests for assistance in borrowing heavy equipment (motor grader) as much as 10 Hm for fixing of village road, has been responded on 27 April 2022 	
1.1.4	(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official.	Company has developed a communication procedure under " <i>Mekanisme Penanganan Permintaan Informasi Stakeholder</i> " (No. SOP; AA-GL-5008F.1-R1) dated 22 August 2011. The procedure described that information request can be receive by oral or written, or by representative of communities; the company will responded according to respective authorities, starts from Humas (public relation), Estate/Mill manager, Group Manager and Regional Office. The company responses against all information request sent by stakeholders including response time of 14 working days after information request accepted. In addition, record related to information request and company response kept and maintained for three (3) years.	Complied
		Based on public stakeholder consultation with KUD/cooperative chairman, local contractor, NGO and public official, it was revealed that company has communicating in good manner. Company also provide response to information request in accordance to authority and the communication SOP.	
		Ukui Smallholder:	
		The Smallholder Manager has established mechanism for communication and consultation " <i>Prosedur Konsultasi dan komunikasi Didokumentasikan, Diungkap, Diimplementasikan Tersedia dan Dijelaskan Kepada Semua</i>	

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		Stakeholder" dated 4 January 2022, shaped flow Chart that describes the process of incoming information requests up to the responses provided. Responsible for the response of information from the stakeholders is done by the Field Assistant then will be arranged to the Estate Manager. Each smallholder member has "Buku Panduan dan Catatan Petani Plasma", whereas explains the flow process of consultation and communication. Both of communication by written or verbal communication to group management are acceptable.	
1.1.5	An up-to-date list of contacts and detailed stakeholder information is available along with designated representatives.	List of stakeholders updated in July 2019, there were 3 types of stakeholders i.e.: government (agency office in Pelalawan Regency, Head of Subdistrict Police of Ukui, Head of Subdistrict of Ukui, head of village), Kebun Masyarakat (20 smallholders) and NGO (WWF, Scale Up). The stakeholder list completed with name of chairman, address and contact number. List of information that can be access by relevant stakeholders available in indicator 1.2.1. The list is consist of information related to the contact person, contact number, address or office that can be visit etc. The list of stakeholder list updated annually by Public Relation. Last update performed in 31 March 2022, consist of 35 stakeholders which related to company operation, as follows: Government institution, consist of Surrounding villages, District Head, and related agency of Pelalawan Regency (Dinas Lingkungan Hidup, Dinas, Perkebunan, Dinas Tenaga Kerja, BPN). Chairman of Koperasi Unit Desa (KUD) which under company scheme smallholder. Informal institution around the company, e.g. FK-KPPS, GWKAK, Worker Union and WKAK. NGO around the company e.g. WWF, Scale Up.	Complied

		Ukui Smallholder: The Smallholder Manager has consistently updated the list of stakeholders, the last update performed on 2 January 2021, where there are 59 stakeholder, e.g.: 1. Stakeholders from PT IIS (9 stakeholders) 2. Stakeholders from local government (18 stakeholders) 3. Stakeholders related agency in Pelalawan Regency (8 stakeholders) 4. Stakeholder from banks (6 stakeholders) 5. Stakeholder from KUD (18 stakeholders).	
Criteria	1.2: The unit of certification commits to ethical conduct in all business of	perations and transactions.	
1.2.1	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.		Complied



In the recruitment process policies have been applied related to business ethics, which are stipulated in the Work Agreement Letters both PHL, PKWT and in the Collective Labor Agreement (PKB).

In the Daily Worker Agreement (PHL) and PKWT Work Agreement, it is also explained in relation to company policy stated in appendix 1, that is: Disgraceful Acts / Actions of Workers That Result in the Termination of the Work Agreement; "Committing and / or directly or indirectly involved in a fraud and / or theft and / or embezzlement of goods and / or money belonging to the company, embezzling company money, accepting gifts from other parties due to work results. "Perbuatan/Tindakan Tercela Tenaga Kerja yang Mengakibatkan Berakhirnya Perjanjian Kerja; "Melakukan dan/atau terlibat langsung maupun tidak langsung dalam suatu penipuan dan/atau pencurian dan/atau penggelapan barang dan/atau uang milik perusahaan, Menggelapkan uang milik perusahaan, meneripa uang pemberian dari pihak lain karena hasil kerja".

At the recruitment process has been applied policy related to business ethics and also set forth in the letter of the work agreement both PHL, PKWT and in PKB.

In the daily freelance work agreement and the PKWT work agreement, it is also explained in relation to the company policy stated in Appendix 1; Occupational action/actions that resulted in the expiration of the employment agreement; "Doing and/or engaging directly or indirectly in a fraud and/or theft and/or embezzlement of the company's goods and/or money, darkening the company's money, terrorize the awarding of the other party due to work

PKB period 2018-2020 has explained related to business ethics in article XXII about "Obligations of The Company and Employees"; including: employers and workers are obliged to maintain good character and do not contradict the legal norms and moral values, employers and workers are



obliged to comply with and enforce all regulations and legislation on Applicable employment.

PT IIS – Ukui II in some of its activities cooperates with second parties (contractors), related to the policy of the code of business ethics has been set forth in the contract agreement Article 13; Manipulation and pesengkongkolan, taken sample of contract:

- a. Perjanjian Kerja Pengangkutan Janjangan Kosong Kelapa Sawit No. 001/E2KUK/I/22 dated 01 January 2022, cooperation agreement between PT Inti Indosawit Subur –Ukui II and Pengarapen Gurusinga for transportation Empty Fruit Bunch (EFB).
- Perjanjian Pengangkutan No. 08/VI/TS-IIS/2020 dated 4 June 2020, corporation agreement between PT Inti Indosawit Subur – Ukui and CV Teman Setia for transportation CPO, Palm Kernel and CPKO

Ukui II Smallholder:

The Smallholder Manager already has a Code of Ethical Business Policy that included on "Kebijakan Manajer Group ICS" signed on 11 August 2020, and has been disseminated to each member through the "Kegiatan Refresh Pelatihan P&C RSPO" was performed on 11 August 2020 attended by 83 farmers where in point 2 stated "Committed to ethical conduct in business in overall transactions and business operations, prohibition all forms of corruption, bribery and fraud in the use of funds and resources".

Document verification shows that all farmer members have stated approval of all policy issued by Smallholder Manager, including policy related to code of ethic which described in the Agreement Letter. Document seen: Member of KUD Sumber Makmur and KUD Bakti as many as 420 kapling (plot) have signed Cooperation

Separately, the policy of the business code of conduct is stated in the cooperation contract with the second party. Statements relating to business ethics are mentioned in Article 8; About Prohibition: that: The

		,	
		owner of the fleet (Transporter) is charged with fraud, theft and embezzlement of TBS, e.g;	
		a. Surat Perjanjian Kerja Armada TBS – FFB Transport Work Agreement between KUD Karya tani with FFB Transporter on behalf of Bahri (location at Sei Beras-beras Village, Sub district of Ukui, District of Pelalawan), doc. No. 02/SPK/KUD-KT/TBS/I/2021 dated 4 January 2021.	
		b. Surat Perjanjian Kerja Armada TBS – FFB Transport Work Agreement between KUD Sawit Subur with FFB Transporter on behalf of Hurip Budiman (location at Kampung Baru Village, Sub district of Ukui, District of Pelalawan), doc. No. 0015/SPK/KUD-SS/TBS/I/2021 dated 4 January 2021	
		Based on interview with smallholders shows that they have a good understanding of the Code of Business Conduct policy issued by the Smallholder Manager.	
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.	UKUI Group including scheme smallholder has mechanism regarding reporting guarantees and case disclosures; from the case report referring to procedure AA-GL/510.1-R0, Public Relations will convey the information to GM and keep the reporting party confidential. GM and Public Relations provide a maximum response of 14 days for a whistle-blower case referring to the related procedure: refer to the AA-GL-5009.1 R0 procedure for settlement with the local community and resolution of employee complaints related to employment referring to the AA-HR-308.5-R0 procedure. This mechanism has been disseminations on 10 February 2020.	Complied
		To ensure that the policy has been implemented by all related parties, PT IIS - Ukui has a monitoring mechanism through internal audit actions every year. The last internal audit (Visit Agronomy) was conducted on 13-17 December 2021 on Sei Lala Estate, Soga Estate on 23-30 May 2021 and Visit Engineering at Ukui II Mill on 23-30 May 2021. From the results	



		of the internal audit, there are no discrepancies related to the implementation of company policies.
		The Company - UKUI Group (including scheme smallholder) has implemented business conduct policy to all employees, it is repeated an in employment contract with PKB employees period 2018-2020. Describes on article XXII about "Kewajiban Perusahaan dan Pekerja"; these included: Pengusaha dan pekerja berkewajiban memelihara budi pekerti yang baik dan tidak bertentangan dengan norma hokum dan nilai susila, Pengusaha dan pekerja berkewajiban mematuhi dan menjalankan segala peraturan dan perundangan tentang ketenagakerjaan yang berlaku". At the recruitment process has been applied policy related to business
		ethics and also set in the letter of the work agreement both PHL, PKWT and in PKB.
		In the daily worker agreement and the PKWT work agreement, it is also explained in relation to the company policy stated in Appendix 1; Occupational action/actions that resulted in the expiration of the employment agreement; "Doing and/or engaging directly or indirectly in a fraud and/or theft and/or embezzlement of the company's goods and/or money, darkening the company's money, terrorize the awarding of the other party due to work
		Based on the interview with some employees and stakeholders that they have understood linked to the company's policy.
	le 2: Operate legally and respect rights ent legal requirements as the basic principles of operation in any jurisd	liction.
Criteria	2.1: There is compliance with all applicable local, national and ratified	d international laws and regulations.
2.1.1	(C) The unit of certification complies to relevant regulations.	Unit of certification within this scope are UKUI-II Mill supplied by Soga Estate, Sei Estate and 6 Smallholders Cooperatives. Legal requirements of land use rights in Indonesia is recognize as "Hak Guna Usaha" or Land

Title. Where land use-rig			ued by National Land Department. The legal as follow:
Estates		Area (Ha)	Land Title
Soga		2,988	HGU Certificate No. 013, 6 Jul 2009. Exp: 2044. Total area: 2,704.22 Ha.
			SK. Ka. BPN RI No: 78-HGU-BPN RI-2008, 19 Dec 2008.
Sei Lala		3,178	HGU Certificate No. 016, 3 Nov 2010. Exp: 2045. Total area: 299.51 Ha. (remain area i HGU certificate No. 01 Year 1989 with 6,727.40 Ha)
			SK Ka. BPN No: 156/HGU/BPN/2004, dat November 2004.
Smallhold	ders	Area (Ha)	Land Title
KUD Subur	Tani	780	SHM (Certificate of Land Ownership)
KUD Karya	a Tani	734	SHM (Certificate of Land Ownership)
KUD M Abadi	Mekar	574	SHM (Certificate of Land Ownership)
KUD Trani	Maju	962	SHM (Certificate of Land Ownership)
KUD Bahagia	Tani	1,366	SHM (Certificate of Land Ownership)
KUD U Tani	Jsaha	1,292	SHM (Certificate of Land Ownership)
TOTAL		11,874	



The company has also complies with the other regulations, such as:

- Agricultural practices, the company already has plantation business licenses/Surat Pendaftaran Usaha Perkebunan-SPUP based on Decree of Ministry Forestry and Plantation No. 185/Mentanhut/VII/2000 dated 3 November 2000 and IUP B PT IIS No. KPTS.525.3/DISHUTBUN/2013/446 dated 29 May 2013.
- Environment, the company already has environmental permit/izin lingkungan as per "Surat Keputusan Gubernur Riau No.976/X/2009 tanggal 28 Oktober 2009 tentang Dokumen Pengelolaan dan Pemantauan Lingkungan"
- Handling of Hazardous Waste Storage: the company already has a permit of Hazardous Waste Storage No. KTPS.503/DPMPTSP-LB3/2020/33 dated 29 December 2020.

Smallholders:

Establishment deed, for example:

1. KUD Tani Bahagia

Cooperative Establishment Deed No. 481 dated 16 January 2015 listed by public notary Desy Arisandi SK, MKn on behalf of Koperasi Tani Bahagia located in Kulim Jaya Village, Subdistrict of Lubuk Batu Jaya, District of Indragiri Hulu.

2. KUD Usaha Tani

Cooperative Establishment Deed – Amendment Deed on behalf of KUD Usaha Tani issued by Minister of Cooperatives and Small Entrepreneurs on 27 February 1996.

3. KUD Karya Tani,

		Cooperative Establishment Deed – Amendment Deed Number 01/KPTS/PAD/IV.2/02/V/2009 on behalf of KUD Karya Tani issued by Minister of Cooperatives and Small Entrepreneurs on 18 May 2009. In addition, all KUD's has had the business permit, plantation permit, tax number and environmental permit from the local government.	
2.1.2	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.	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).	Complied
2.1.3	Legal or authorized boundaries are clearly demarcated and visibly maintained and there is no planting beyond these legal or authorized boundaries.	According to the national regulation, land title (HGU) holder shall maintain the condition of boundary poles. Based on field visit in Estate concluded that the boundary poles area well maintained. For example: • Boundary poles BPN 16 Block B89b Afdeling III • Boundary poles BPN 17 Block B89b Afdeling III • Boundary poles BPN 20 Block C89i Afdeling IV • Boundary poles BPN 22 Block D89d Afdeling IV The boundary poles recorded in document "Monitoring Pemeriksaan Patok Batas". The poles monitored twice a year. The last monitoring held on 07 December 2021. All poles (59 unit) reported in good condition.	Complied
Criteria 2	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.	During this audit, management units has had several contracts related to third parties as follows:	Complied



- Mill:
 - 1. CV Jaya Pertama (CPO/PK/CPKO Transporter)
 - 2. PT Buana Jaya Bersama (CPO/PK/CPKO Transporter)
 - 3. CV Jasa Sahabat Abadi (CPO/PK/CPKO Transporter)
 - 4. CV Sumber Kencana (CPO/PK/CPKO Transporter)
- Soga Estate:
 - 1. PT Teknik Jaya Abadi (Road Maintenance), Contract No.020/E2KSA/02/2022 dated 3 January 2022, address: Jalan Siak II, RT/RW 001/09 Rumbai.
- Sei Lala Estate:
 - 1. Kuntaryadi (school bus), Contract No.042/P2/KSL/IV/22 dated 1 January 2022, address: Jalan Air Putih, Air Putih Village.

Scheme Smallholder:

In smallholder activity, FFB transport from their land to mill by using the association of FFB-Transporter (usually smallholder members that owned truck). For example, as follows:

- KUD Karya Tani with Mr. Bahri (FFB Transporter) Sei Beras Beras Village, Lubuk Batu Jaya Sub District, Indragiri Hulu District, Agreement No. 02/SPK/KUD-KT/TBS/I/2021 dated 4 January 2021.
- KUD Mekar Abadi with Mr. Sabar (FFB Transporter) Sei Beras Beras Village, Lubuk Batu Jaya Sub District, Indragiri Hulu District, Agreement No. 03/SPK/KUD-MA/TBS/I/2021 dated 4 January 2021.
- KUD Tani Subur with Mr. Tobik (FFB Transporter) Sei Beras Beras Village, Lubuk Batu Jaya Sub District, Indragiri Hulu District, Agreement No. 06/SPK/KUD-TS/TBS/I/2021 dated 4 January 2021.

Based on interview with boards of KUD during the field visit, FFB transportation costs are billed to each farmer every month and paid



		directly to the FFB-Transporter. The transportation costs are different for each KUD because the charges are in accordance with the agreement at the annual meeting of the KUD. There is no payment dispute so far.	
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.	Ukui II POM implemented Identity Preserved Module. Mill only received FFB from certified sources which is own estate (Soga and Sei Lala Estate) and 6 smallholder scheme KUD Tani Subur, Karya Tani, Mekar Abadi, Trani Maju, Tani Bahagia and Usaha Tani.	Complied
2.2.3	All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour.	 Third party contract with some FFB has completed with some important clause such as: The company policy related to children/underage worker, anti-drugs etc. Workers payment referred to local minimum payment's regulation. All worker will be register in health insurance and workers insurance according to national regulation. The same regulation also implemented in smallholder scheme. All of contract data kept by Head Clerk in estate and mill. 	Complied
Criteria	2.3: All FFB supplies from outside the unit of certification are from legal	sources.	
2.3.1	 (C) For all directly sourced FFB, Palm Oil Mill (POM) requires: 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. 	Ukui II POM has chosen the Identity Preserved Module, thus there is no record of uncertified FFB supplier. The supply bases are estates (Soga Estate and Sei Lala Estate) and scheme smallholder (certified under Ukui II POM). The scheme smallholders are KUD Tani Subur, KUD Karya Tani, KUD Mekar abadi, KUD Trani Maju, KUD Tani Bahagia and KUD Usaha Tani. The information related geolocation, proof of ownership status, and trading license a cooperative has shown during audit.	Complied
2.3.2	For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in indicator 2.3.1.	Based on document review and interview to the management there is no indirectly sourced FFB for Ukui II POM, the unit of certification did not obtains of FFB from the collection centres, agents or other intermediaries, and also Ukui II POM has chosen the Identity Preserved Module, the	Complied

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		supply bases are estates (Soga Estate and Sei Lala Estate) and scheme smallholder (certified under Ukui II POM). The scheme smallholders are KUD Tani Subur, KUD Karya Tani, KUD Mekar abadi, KUD Trani Maju, KUD Tani Bahagia and KUD Usaha Tani.	
-	e 3: Optimise productivity, efficiency, positive impact and resilient plans, procedures and systems for continuous improvement.	ence	
Criteria	3.1: There is an implemented management plan for the unit of certificati	on that aims to achieve long-term economic and financial viability.	
3.1.1	(C) A business or management plan (minimum of three years) is documented and where applicable, includes a jointly developed business case for Scheme Smallholders.	Certificate holder has provided long-term management plan in document Rencana Jangka Panjang period 2020 – 2025. This document described the five-year business projection of PT Inti Indosawit Subur.	Complied
		Long-term management plant of PT Inti Indosawit Subur has documented in <i>Rencana Jangka Panjang period 2020 – 2025</i> . The long-term management plan covered parameter as follows:	
		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)	
		The same information of long-term management plan document also sighted for smallholders.	
		Based on interview with sustainability staff, PT Inti Indosawit Subur has started to engage with independent smallholder named Create Share Value (CSV) near the Inti Indosawit Subur's concession since a couple year ago and renewed annually.	

.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available.	The unit of certification was able to demonstrate annual replanting program. Replanting starts at 2017. Based on document verification, the record of replanting program as follows:								
		Voor	Estate (F	la)						
		Year	Ukui	Soga	Sei Lala	7				
		2017	542	277	-					
		2018	455	-	-	7				
		2019	-	-	-					
		2020	-	-	-	7				
		2021	494	-	511					
		2022	557	195	540	7				
		2023	649	391	657	7				
		2024	-	516	751	7				
		2025	-	594	-	7				
		2026	-	560	-	7				
		2027	-	470	328	7				
		2028	-	-	-	7				
		2029	-	-	-	7				
		2030	-	-	-	7				
		Total	2,697	3,003	2,787	7				

Sche	eme s	small	holde	rs:											
KU	JD					Repl	antin	g Progi	am (I	Ha)					
		2021	202	2 2	2023	202	24	2025	202	26 2	2027	Tot	al		
Tai Sub		-	-		-	ı		780	-		-	78			
Kary Tani	/a i	-	-			184	4	550	-		-	73	4		
Meka		-	-			394	4	180	-		-	57 [,]	4		
Tran Maju		-	-		674	288	3	-	-		-	96	2		
Tani Baha a		-	-		764	602	2	-	-		-	1,36	56		
Usał Tani		-	626		666	-		-	-		-	1,29	92		
Tota	al	0	626	2	2,104	1,46	58	1,510	0		0	5,70)8		
S	KUD		ting Prog												
		2017	2018	2019	2020	20 21	20 22	2023	202 4	2025	202 6	202 7	2028		
A	Sumb er Makm ur	-	-	1	-	-	-	806	-	756	-	-	-		
Α	Bina Usaha Baru	472	-	-	-	-	-	144	-	-	-	-	-		



3 A	Karya Bersa ma	-	-	-	422	-	42 2	-	-	-	-	-	-	
4 A	Sawit Subur	-	538	-	-	-	-	200	170	-	-		-	
5 A	Bina Sejaht era	-	-	-	-	-	57 4	-	662	-	-		-	
6 A	Sumb er Bahag ia	-	-	-	422	-	30 2	482	-	-	-	1	-	
U k u i- II	Bukit Potalo	-	-	-	-	-	-	-	-	-	-	494	-	
R . S e k o	Usaha Baru	-	-	-	-	-	-	1	-	-	-	494	-	
1 B	Tani Subur	-	-	-	-	-	-	-	-	308	472	-	-	
2 B	Karya Tani	-	-	-	-	-	-	-	-	184	330	220	-	
3 B	Mekar Abadi	-	-	-	-	-	-	-	-	270	304	1	-	
4 B	Trani Maju	-	-	-	-	-	-	-	374	284	304		-	
5 B	Tani Bahag ia	-	-	-	-	-	39 4	-	420	552	-	-	-	



		6 B	Usaha Tani	-	-	-	-	49 6	-	-	390	406	-	-	-	
		Gra Tot	and tal	472	538	-	844	49 6	2,1 02	2,022	2,0 90	2,354	1,41 0	1,2 08		-
		Sigl		ders: the rec nber Ba			anting	real	izatic	n 202	0 was	s 422	Ha (l	ocate	ed in	
3.1.3	The unit of certification holds management review at planned term according to the scale and nature of the activities undertaken.	(VA Soil Rep 202 and circ and has Sei Rep by field infir VE Rep Aug a k	a) and ga Es port I 21. The record constant of the constant	pany hall Visit Extate: No. VA, here we ommen ath and colidation of implementation of implementation value. If II PO No. VE-021. The sue reserved.	/KSA/ere no dation linter on. Genoven e: (SL/D) The mon for was the control of th	MAY/o mail o mail o of rrow, eneral nent of EC/Fl nain is harve raking	FULL/On issue mmat manur ly, ma especial sues a esting. The FULL-On main main manur ly manur	For 01-20 es in ure ing, nage ally r -21, affec action of the control of the cont	o21, this area pest emen oad date ting ough on	date of estate and the second of vision of vis	of vis, how d to ase, ormandance t 13 - mance sue, epari	sit 13- wever weed castra- nce is e and - 17 D e was mana ing the	-17 D curre ling of tion, s increa pruni ecem unsa geme geme ne h	pecennt is: ontro suppl asing ng. ber 2 tisfac arves	mber sues of in lying and 2021 ctory f Sei sting	Complied



		All the issues have been corrected by management unit.	
		Scheme smallholders:	
		There was a record of Deputy Head of Smallholder in October 2021. Based on the minutes of meeting, Coordinator Smallholder Region 2 has captured the issues related to:	
		FFB price in outside mill higher than smallholder FFB Smallholder price.	
		Losses fruit losses	
		Each smallholder association has had annual monitoring activity to ensuring annual target inline with the implementation. Sighted monitoring inspection of plot conditions document year 2021 of KUD Tani Subur, KUD Karya Tani and KUD Mekar Abadi. Parameter to be monitored was weeding in circle, path and collection point, pruning and frond stacking.	
	3.2: The unit of certification regularly monitors and reviews their economonstrable continuous improvement in key operations.	nic, social and environmental performance and develops and implements ac	tion plans that
3.2.1	(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.	To increase work productivity, the company always creates new improvements with the hope that the company's operational activities will be more efficient. For this reason, staff and employees are given the opportunity to create new innovations.	Complied
		Estate:	
		One of the efforts to increase crop productivity is by using harvest sticks (Palm Pro) and also increase the productivity of FFB transportation with the BIN System, the BIN system is a system for transporting harvested FFB to the POM for processing. The system consists of two transport vehicles and a bin.	
		two transport vehicles and a bin.	

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		Ukui II POM:	1
		Ukui II POM has compiled improvements to reduce overtime costs. Several important points related to this improvement include:	
		 Adding 1 unit full bunch press machine to add EFB fuel to the boiler, the target is that the use of shells for fuel in boilers from 59.5% in 2021 decreases to <35% in 2022. 	
		 Adding 1 unit full bunch press machine, so that 60% of 2021 EFB processing will increase to >75% 2022. 	
		Target to reduce the use of shell fuel in boilers from 49.1% to 35% of Shell Production with Process Control.	
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.	RSPO Annual Communication of Progress 2019 of PT Inti Indosawit Subur has been available in RSPO website under membership number 1-0022-06-000-00. At the time of the audit, the RSPO Metrics template was submitted.	Complied
Criteria	3.3: Operating procedures are appropriately documented, consistently in	mplemented and monitored.	
3.3.1	(C) Standard Operating Procedures (SOPs) for the unit of certification	Soga & Sei Lala Estate:	Complied
3.3.1	(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.		Complied
3.3.1		Soga & Sei Lala Estate: Estate has had Standard Operational Procedures (SOP) that covering	Complied
3.3.1		Soga & Sei Lala Estate: Estate has had Standard Operational Procedures (SOP) that covering entire operational activity as follows: • SOP AA-APM-OP-1100.01-R4 dated 5 September 2016: Pembibitan	Complied
3.3.1		Soga & Sei Lala Estate: Estate has had Standard Operational Procedures (SOP) that covering entire operational activity as follows: SOP AA-APM-OP-1100.01-R4 dated 5 September 2016: Pembibitan (Nursery). SOP AA-APM-OP-1100.02-R3 dated 10 June 2015: Penanaman Areal	Complied
3.3.1		 Soga & Sei Lala Estate: Estate has had Standard Operational Procedures (SOP) that covering entire operational activity as follows: SOP AA-APM-OP-1100.01-R4 dated 5 September 2016: Pembibitan (Nursery). SOP AA-APM-OP-1100.02-R3 dated 10 June 2015: Penanaman Areal Baru (New Planting). SOP AA-APM-OP-1100.03-R2 dated 24 July 2015: Pembuatan dan Perawatan Jalan dan Jembatan (Road and Bridge construction and 	Complied

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Tanah dan Air (Soil & Water Conservation).

- SOP AA-APM-OP-1100.06-R6 dated 16 February 2017: *Menanam kacangan* (Planting cover crops).
- SOP AA-APM-OP-1100.07-R6 dated 16 February 2017: *Menanam Kelapa Sawit* (Planting Oil Palms).
- SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: *Pengendalian Gulma* (Weed control).
- SOP AA-APM-OP-1100.09. R5 dated 26 December 2018: *Pemupukan* (Fertilizer application).
- SOP AA-APM-OP-1100.10. R6 dated 23 November 2016: Pengendalian Hama dan Penyakit (Pests & Disease Control).
- SOP AA-APM-OP-1100.11. R1 dated 1 February 2009: *Pestisida dan Pengendaliannya* (Pesticide Handling).
- SOP AA-APM-OP-1100.12. R3 dated 23 November 2016: *Kastrasi* (Palm castration) explain cutting all generative product (mal flower, female flower, all fruit, to support vegetative growth) done 5-6 months before being harvested.
- SOP AA-APM-OP-1100.13. R3 dated 4 March 2016: *Tunas Pokok* (Pruning).
- SOP AA-APM-OP-1100.14. R3 dated 16 February 2017: *Sensus dan Identifikasi Pokok* (Census and Palm Identification).
- SOP AA-APM-OP-1100.15. R2 dated 1 October 2010: *Sensus Produksi* (Production Census).
- SOP AA-APM-OP-1100.16. R1 dated 1 February 2009: *Konsolidasi Pohon Tumbang* (Provision of Support to Fallen Palm).
- SOP AA-APM-OP-1100.17. R1 dated 23 October 2014: *Pengelolaan Air* (Water Management).
- SOP AA-APM-OP-1100.18.R3 dated 20 April 2015: Potong Buah

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(Harvesting).

- SOP AA-APM-OP-1100.19.R1 dated 1 February 2009: *Pengelolaan Transport* (FFB Transport).
- SOP AA-APM-OP-1100.20-R6 dated 1 May 2019: *Peremajaan* (Replanting).

Ukui II POM has documented and implemented procedure related to process of FFB to become CPO and PK, starts from FFB receiving to dispatch of CPO and PK:

- 1. SOP AA-MPM-OP-1400.02.R2 dated 1 September 2011: *Stasiun Penerimaan* for FFB Receiving Station;
- 2. SOP AA-MPM-OP-1400.03.R1 dated 1 February 2009: *Stasiun Rebusan* for Sterilizer;
- 3. SOP AA-MPM-OP-1400.04.R1 dated 1 February 2009: *Stasiun Pemisahan Berondolan* for Loose Fruit Separation;
- 4. SOP AA-MPM-OP-1400.05-R1 dated 1 February 2009: *Stasiun Pengadukan* dan Pengempaan for Pressing Station;
- 5. SOP AA-MPM-OP-1400.06-R1 dated 1 February 2009: *Stasiun Pemurnian* for Clarification;
- 6. SOP AA-MPM-OP-1400.07-R1 dated 1 February 2009: *Stasiun Pemisahan Nut dan Fiber* for Nut and Fiber Separation;
- 7. SOP AA-MPM-OP-1400.08-R1 dated 1 February 2009: *Stasiun Kernel* for Kernel Station;
- 8. SOP AA-MPM-OP-1400.09-R1 dated 1 February 2009: Stasiun Boiler;
- 9. SOP AA-MPM-OP-1400.10-R1 dated 1 February 2009: *Stasiun* Engine Room;
- 10. SOP AA-MPM-OP-1400.11-R1 dated 1 February 2009: *Stasiun* Water Treatment;



- 11. SOP AA-MPM-OP-1400.12-R1 dated 1 February 2009: Laboratorium;
- 12. SOP AA-MPM-OP-1400.13-R1 dated 1 February 2009: *Stasiun Pengelolaan Limbah* for Palm Oil Mill Effluent Treatment;
- 13. SOP AA-MPM-OP-1400.14-R2 dated 1 September 2011: *Stasiun Penimbunan dan Pengiriman CPO dan Kernel* for CPO and PK Bulking and Despatch Operation;
- 14. SOP AA-MPM-OP-1400.15-R1 dated 1 February 2009: *Perawatan* for Preventive Maintenance;
- 15. SOP AA-MPM-OP-1400.19.R2 dated 1 September 2011: *Manajemen dan Metode Menghitung Emisi Gas Rumah Kaca* (GHG)
- 16. SOP AA-MPM-OP-1400.18-R4 Book Keeping
- 17. AA-MPM-OP-1400.17-R6 Traceability

Those documents above are available in each unit.

Scheme Smallholder:

Scheme smallholder has had best management practices procedure as follows:

- AA-PLASMA-PP-KS-01 *Pembibitan* (Nursery)
- AA-APM-OP-1100.09-R3 *Pemupukan* (Manuring) dated 20 April 2015
- AA-PLASMA-PP-KS-04 Potong Buah (Harvesting)
- AA-PLASMA-PP-KS-05 *Pengangkutan TBS* (FFB Transport)
- AA-APM-OP-1100.10-R5 Pengendalian Hama dan Penyakit (Pest and Disease Control) dated 11 January 2016
- AA-APM-OP-1100.20-R5 Peremajaan (Replanting) dated 4 March 2016
- AA-MM-508-1-RO Penerimaan TBS Plasma (FFB Plasma Receiving) 1 September 2015



- AA-MM-508-2-RO *Penentuan Taksasi TBS Plasma* (FFB Plasma Estimation)
- AA-APM-OP-1100.8-R5 *Pengendalian Gulma* (Weed Control)
- AA-FA-220-2-RO Stempel (Stamp)
- AA-MPM-OP-1400-17-R6 Ketertelusuran (Traceability) dated 1 September 2017
- AA-APM-OP-1100.02-R3 *Penanaman Area Baru* (New Planting)
- AA-SOP-ES-6001-R4 *Audit Internal Sustainability* (Internal Audit Sustainability)
- AA-KL-12-EFP 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) dated 1 August 2010
- AA-HR-305.2-RO *Rekrutmen dan Seleksi Karyawan* (Recruitment and Selection of Employee).

During onsite audit, auditor has conducted field visit to the Soga and Sei Lala Estate as follows:

- Harvesting in Block B98g Afdeling 2 Soga Estate and Block C19
 Afdeling 3 Sei Lala Estate. The implementation was good, the
 harvester can demonstrate the best management practices for
 harvesting and also safety working procedure.
- Barn owl box Block B899g Afdeling 2 Soga Estate and Block C19 Afdeling 3 Sei Lala Estate.
 - The management unit using natural predator to control rat infestation.
- Chemical weeding, Block A89e Afdeling 1 Sei Lala Estate.
 Circle and path, using micron herby (VVLV). Isopropyl amina glifosat and metil metsulfuron.

		 The implementation was good, the harvester can demonstrate the best management practices for harvesting and also safety working procedure. Land application, Block C89k Afdeling 4 Sei Lala Estate. Management unit using palm oil mill effluent to enrich the soil fertility. In accordance with the land application permit, Sei Lala Estate has 264 Ha of land application areas and applied with dosage 800 m3/Ha/year. Fertilizer application Block A16 Afdeling 1 Sei Lala Estate According to fertilizer recommendation, Sei Lala Estate conducted fertilizer application using HGFB with dosage 7.5 gr/palm. The fertilizer applicator can demonstrate the application and safety working procedure. EFB application Block C89a Afdeling 3 Soga Estate. 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. 	
3.3.2	A mechanism to check consistent implementation of procedures is in place.	 To ensuring field implementation consistent with procedures, management has a mechanism such as: Annual Visit Agronomy (VA) and Visit Engineering (VE). Annual Quality Control visit conducted by Quality Control Assistant. Monthly Management Meeting. For example, there is a record of management meeting Soga Estate on 27 November 2021 that attended by group manager, estate manager, field assistant and head clerk. Some issues during the VA/VE visit recorded in the report as follows: Soga Estate: 	Complied



		Report No. VA/KSA/MAY/FULL/01-2021, date of visit 13-17 December 2021. 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. Generally, management performance is increasing and has a lot of improvement especially road maintenance and pruning.	
		Sei Lala Estate: Report No. VA/KSL/DEC/FULL/01-21, date of visit 13 – 17 December 2021 by Sinnaiha G. The main issues affecting performance was unsatisfactory field preparation for harvesting. Through the issue, management of Sei Lala Estate was taking the action by preparing the harvesting infrastructure.	
		VE Ukui II POM:	
		Report No. VE-PUD-AUG-FULL-01-2021-Full Visit, date of visit 24- 31 August 2021.	
3.3.3	Records of monitoring and any actions taken are maintained and available.	Certificate holder conducted monitoring of operational activity in all levels of workers. Each field supervisor has equipped with monitoring sheets/worksheets. For example, harvesting supervisor collected harvesting record and quality of each harvester. The report submitted to estate manager daily.	Complied
		Therefore, daily operational activity also recorded in daily worksheet by mill supervisor before reported to the mill manager.	
		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.	

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.

Environmental Impact Assessment:

The environmental impact analysis documented in ANDAL, RKL RPL included consultation with relevant stakeholders to identify impacts and to develop any mitigation measures. PT Inti Indosawit Subur – Ukui group is able to demonstrate environmental impact assessment in AMDAL document (*Studi Analisis Dampak Lingkungan/ANDAL Perkebunan Kelapa Sawit Pola PIR – Transmigrasi dan Pabrik Minyak Kelapa Sawit/PMKS di Kabupaten Kampar, Indragiri Hulu dan Bengkalis Propinsi Riau*). AMDAL document has approval as per "SK Menteri Pertanian No.013/ANDAL/HA/V/95" dated 05/05/1995. In addition, environmental management and monitoring plan - RKL/RPL as per "Surat Keputusan Menteri Pertanian No.03/RKL-RPL/BA/IV/1996" dated 04/04/1996. Initial EIA was performed by Independent consultant PT Swastika Aryindo Buana, consist of the professional and competent assessor.

EIA document was included the impacts of any smallholder/outgrower scheme. PT Inti Indosawit Subur — Ukui Group has increase the mill capacity in 2009, Social Environmental Impact Assessment for mill capacity increase has been conducted and presented in "Dokumen Pengelolaan dan Pemantauan Lingkungan Hidup (DPPL) Peningkatan kapasitas PMKS dan Sarana Pendukung PT Inti Indosawit Subur Kebun Ukul". DPPL document has been approved by Riau Governor as per "Surat Keputusan Gubernur Riau No.976/X/2009 tentang Dokumen Pengelolaan dan Pemantauan Lingkungan (DPPL) untuk Peningkatan Kapasitas PMKS dan sarana pendukung PT Inti Indosawi — Kebun Ukui untuk Kebun Inti dan Kebun Plasma dengan Kapasitas Ukui I POM (90 ton TBS/jam) dan Ukui I (75 ton TBS/jam)", dated 28/10/2009. SEIA for mill capacity increase was performed by independent consultant PT Holistika Primagrahita, consist of the professional and competent assessor.

Complied



Environmental impact assessment covered in ANDAL, RKL RPL document and environmental aspect and impact, e.g.: Pre construction: • Employee recruitment Construction Nursery • Land clearing and planting preparation • Infrastructure and supporting facility construction and development Land preparation • Immature Palm oil plant upkeeping Mill location planning Palm Oil Mill construction Operation: Mature plantation upkeeping • Soil and water conservation • Land application (waste water application to palm oil plantation) and **EFB** application Harvesting and collecting FFB • FFB transportation to Palm Oil Mill • FFB Processing in Palm Oil Mill • Transportation facility providing and maintenance • CPO and PK transportation Waste water processing Replanting • Partnership cooperation **Social Impact Assessment:**



Social Impact Assessment has been conducted by independent consultant from "Fakultas Kehutanan Institut Pertanian Bogor" on July 2010.

The SIA method was taken by participatory ways and involving the affected stakeholder at study location in 19 villages consist of 11 villages at Pelalawan Regency and 8 Villages at Indragiri Hulu Regency.

Social Environmental impact assessment was conducted through regular environmental monitoring, e.g. river water quality, mill effluent quality, air emission, economical condition, social and culture of community and wildlife conservation.

Social Environmental monitoring and management report reported in regular basis each semester in "Laporan Pelaksanaan Izin Lingkungan". Report semester I (Period January – June 2021) and Semester II (Period July – December 2021) has been sent to the government on 19 October 2021 and 26 April 2022 (Dinas Lingkungan Hidup Kab. Pelalawan and Dinas Lingkungan Hidup dan Kehutanan Provinsi Riau, PPE Region Sumatera and to Ministry of Environment and Forestry). Evidence of report submission can be demonstrated in "Daftar Distribusi Eksternal" and "Tanda terima Elektronik Sistem Informasi Pelaporan Elektronik Lingkungan Hidup (SIMPEL) KLHK".

Last report for Environmental Performance, Monitoring and Evaluation conducted of Semester II (Period July – December 2021) to Environmental Agency in Pelalawan Regency, received by Mr Kamisa on 26 April 2022.

Scheme Smallholder

Social Environmental Impact Assessment of Ukui Plasma has included in AMDAL document (*Studi Analisis Dampak Lingkungan/ANDAL Perkebunan Kelapa Sawit Pola PIR – Transmigrasi dan Pabrik Minyak Kelapa*

		Sawit/PMKS di Kabupaten Kampar, Indragiri Hulu dan Bengkalis Propinsi Riau).	
		SEIA identified the significant potential environmental impacts deriving from operational activities such as land clearing, land development and road construction at palm oil plantations.	
		Smallholder management also provide update SEIA for smallholder operation as per " <i>Penilaian Dampak Sosial dan Lingkungan (SEIA) Kebun Plasma Ukui Tahun 2021</i> ". Smallholder manager has identified the social aspect and impact has identified such as:	
		 Consistency of company for villages development Company responsibility for road maintenance Replanting activity Harvesting and FFB transportation: air pollution and road condition, FFB stealing, FFB quality FFB pricing mechanism Labor recruitment and Land legality 	
		Another Environmental aspect and impact evaluation was also conducted as per "Evaluasi Aspek – Dampak Lingkungan" EMS-431-002-LT updated on 7 January 2022. Involving of smallholder and stakeholder on SEIA were evident as per "Notulen Sosialisasi Upaya Pemantauan dan Pengelolaan Dampak Sosial" dated 11 August 2021 and 16 August 2021, participant from Local community villages representative, Cooperatives, Farmer group and Plasma Management with number of participant 35 person.	
3.4.2	For the unit of certification, a SEIA is available and social and environmental management plan and its monitoring have been developed with participation of affected stakeholders.	Social Environment management and monitoring plan document were available in Environmental management plan (RPL-Rencana Pengelolaan Lingkungan) document. Document has been approved by Governor Riau as per "Surat Keputusan Gubernur Riau No.976/X/2009 tanggal 28	Complied



Oktober 2009 tentang Dokumen Pengelolaan dan Pemantauan Lingkungan. Environmental management based on document, e.g.:

- Air quality and noisy management from FFB processing performed by installing the emission monitoring facility in the boiler and genset stack; installing safety in boiler stack, install the cyclone and dust trap in boiler stack, control the emission, controlling fuel efficiency, emission measurement of vehicle, boiler and generator, standard muffler usage, reduce the vehicle speed in emplacement, road maintenance and signboard installation, OHS implementation in Palm Oil Mill.
- Surface water quality and water biota management performed in order to prevent and control the physic and chemist quality of surface water comply to PP No. 82/2001. Performed by create terracing, land cover crop planting in open area and sloping area, organic fertilizer usage, natural predator usage for pest control, operating IPAL, land application, flat bed maintenance in land application area, housekeeping implementation and proper waste handling.
- Soil quality management performed by land application management according to KepMen LH No. 28 Tahun 2003, groundwater quality check, flat bed maintenance, vegetation planting around waste water pond and maintenance of waste water pond, domestic and hazardous waste management.
- Erosion and sedimentation management performed by creating and maintenance the individual terrace (tapak kuda) in area with slope 3 – 15% and maintain the land cover crop (Leguminosae), frond stacking and EFB application.
- Flora fauna management performed by signboard installation regarding prohibition of plant destruction in conservation area, vegetation enrichment in conservation area, wildlife protection and maintain the conservation area.
- Community perception management performed in order to prevent and control the negative perception and potential conflict from community



against employee recruitment process. Company has conducted workers recruitment transparently, each vacancy were publish to surrounding village, FFB purchasing from local plantation surrounding company, coaching and counselling to plasma member, CSR programme implementation.

Social Environmental monitoring and management report reported in regular basis each semester in "Laporan Pelaksanaan Izin Lingkungan". Report semester I (Period January – June 2021) and Semester II (Period July – December 2021) has been sent to the government on 19 October 2021 and 26 April 2022 (Dinas Lingkungan Hidup Kab. Pelalawan and Dinas Lingkungan Hidup dan Kehutanan Provinsi Riau, PPE Region Sumatera and to Ministry of Environment and Forestry). Evidence of report submission can be demonstrated in "Daftar Distribusi Eksternal" and "Tanda terima Elektronik Sistem Informasi Pelaporan Elektronik Lingkungan Hidup (SIMPEL) KLHK.

Last report for Environmental Performance, Monitoring and Evaluation conducted of Semester II (Period July – December 2021) to Environmental Agency in Pelalawan Regency, received by Mr Kamisa on 26 April 2022.

Scheme Smallholder:

Ukui Smallholder has develop the social environment management and monitoring plan as per "Rencana Kelola Sosial Terkait Aspek Permasalahan Sosial Kebun Plasma Ukui", covering:

- Villages development, PT Inti Indosawit Subur Ukui Group as a facilitator of Ukui Smallholder has responsibility to villages development by implementing CSR program.
- Road condition, company has responsibility for road maintenance due to FFB transportation activity;' Company provide the assistance of heavy equipment (grader, compactor, backhoe loader) for road maintenance.



- Replanting activity, company propose the replanting plan program for smallholder plantation and socialize to smallholder member.
- FFB harvesting, company give the training to improve FFB quality from smallholder plantation, strict sanction to FFB stealing.
- Air pollution by FFB transportation, company has a program for road maintenance minimum once a year.
- FFB pricing mechanism, company informed the FFB price regularly according to pricing determination by Disbun Provinsi Riau.

Ukui Smallholder Manager has developed mitigation plan to reduce environmental risks, presented in "Progress Perbaikan Lingkungan Kebun Plasma Ukui" dated 3 January 2022.

Mitigation plan develop by Group Manager such as:

- Optimize FFB transportation, by one way and not returning to the kavling/block to reduce the fossil fuel usage
- TPH arrangement along the side collection road to become one way to ease the FFB transportation
- Performing the proper fertilizing and appropriately to reduce the water pollution, prohibit to fertilizing in riparian areas (3 m from left and right side)
- Use the appropriate PPE to reduce the impact of spraying activity and cooperate with TUS team PT Inti Indosawit Subur to handling the chemical weeding in Plasma Ukui.
- Planting vetiver grass in riparian zone and near to waterways to reduce the soil erosion.

Frond stacking to reduce soil erosion and use the palm frond as mulching/organic fertilizer.

3.4.3	(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in participatory way.	Social Environment management and monitoring plan as per RKL – RPL document has been implemented by PT Inti Indosawit Subur – Ukui Group. The evidence Lingkungan". Based on verification on Environmental management and monitoring report, confirmed that the management and monitoring plan has been well implemented accordingly. Data verified during audit:	Complied
		• Air quality and noisy monitoring from FFB processing performed by emission measurement against Boiler and generator each semester, ambient air quality measurement each semester, noisy measurement (indoor and outdoor) each semester, odour measurement each semester.	
		Air emission quality in Ukui II POM analyse by PT. ITEC Solution Indonesia for Semester I (January – June) 2021 and Semester II (July – December) 2021. The analysis result since January – December 2021 shown comply with regulation.	
		Surface water quality and water biota monitoring to prevent and control the physic and chemist quality of surface water comply to PP RI No 22 tahun 2021. Performed by waste water quality monitoring each month, hazardous waste monitoring, land application monitoring, surface water quality monitoring each semester. Waste water quality monitoring analyse by UPT Laboratorium Bahan Konstruksi Dinas PU & Penataan Ruang Prov. Riau. Waste water analysis result since January — December 2021 shown comply with regulation Peraturan Gubernur Riau No. 35 Tahun 2007 & PermenLHK No 68 tahun 2016.	
		Surface water quality test (Sungai Pematang River and Air hitam river upstream and downstream) analyse by PT. ITEC Soution Indonesia for Semester I (January – June) 2021 and Semester II (July – Desember) 2021. The analysis result since January – December 2021 shown comply with regulation.	



- Soil quality monitoring performed by soil sampling analysis in "rorak, antar rorak and lahan control", EFB application monitoring, groundwater analysis each year. Analysis conducted by Laboratorium Central Plantation Services PT. Central Alam Resources Lestari, Report of Analysis No. 0354/CPS/IV/2021 dated 30 April 2021 and No. 1422/CPS/XI/2021 dated 15 November 2021 shown comply with regulation PerMenKes No. 416/MENKES/Per/IX/1990.
- Erosion and sedimentation monitoring performed by erosion measurement according to USLE method. Measurement result since January – December 2021 shown erosion level average below 6 ton/ha/year for Soga and Sei Lala Estate categorized as very good criteria.
- Flora fauna monitoring performed by wildlife monitoring and monitoring the conservation area each month. Monitoring Since January December 2021 at Soga Estate and Sei Lala Estate shown that there were species of mammal presence (*Macaca fascicularis, Macaca nemestrina, Calosciurus notatus, Sus crofa, Rattus sp, Felis bengalensis, Paradoxurus sp*),13 species of birds (such as: *Halcyon smyrnensis, Rhipidura javanica, Centropus bengalensis, Pycnonotus aurigaster*), 4 species of reptile (*Varanus salvator, fejevarya sp, Mabouya sp, Denrelaphis caudolineatus*).
- Community perception monitoring performed by community interview, employee data monitoring, interview with village head or public figure regarding their perception to company. Company has monitored the public perception through questioner each year. Questioner to public perception regarding the impact of company presence has been disseminated to surrounding community. Latest monitoring of public perception has been performed in 2021, questioner of public perception can be demonstrated and well documented in RKL-RPL report semester II 2021. Generally public perception was positive



regarding the company presence and contribution to the surrounding community.

All management and monitoring plan has been implemented well by company according to RKL-RPL document. The implementation report has been reviewed and reported to government agency per semester (six monthly).

During document verification and interview with management, it can be demonstrated that all the environmental monitoring plan has been implemented as per document RKL-RPL. The evaluation of environmental monitoring plan effectivity has been carried out and presented in RKL-RPL report semester II 2021 (July – December 2021).

Evaluation consist of:

- Trend evaluation of air ambient quality, air emission, odour, ground water quality, wate water quality, surface water quality, soil erosion shown that the result of monitoring are all parameter is met with the standard of regulation. Trend evaluation of water usage still under the budget/standard; biodiversity trend evaluation shown that there were still found the presence of animal including protected animal; Social economic trend evaluation shown increasing each year. Overall the trend evaluation shown the consistency and increasing in environmental performance.
- Critical evaluation, the critical point in environmental monitoring is waste water quality and surface water usage. Based on the result of monitoring shown that waste water quality since January – June 2020 was met with regulation (BOD < 5,000 mg/l and pH 6 – 9).
- Compliance evaluation to regulation. According to evaluation of impact against soil erosion, water quality, soil quality, air quality, biodiversity, surrounding social and economic, health and safety, indicated that PT Inti Indosawit Subur – Ukui II POM has comply with all relevant regulation.

		 Public perception monitoring for 2021 has been carried out and there is no negative perception occurred. Certificate of environmental analysis in Semester II 2021, such as: Genset emission, Report of analysis No. D.10.1346/LHU/2021 dated 5 November 2021. The result was shown comply to PermenLHK No 11/2021. Report of analysis for water quality, No. MT.1/01.10.90.133 dated 22 October 2021. The result was shown comply to Permenkes No. 492 tahun 2010 Report of analysis for air ambient, No. D.10.1347/LHU/2021 dated 5 November 2021. The result was shown comply to PP RI No. 22/2021. 	
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 – Ukui II Group 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 discrimination treatment during recruitment and promotion process. Promotion of worker will be done base on work period, annual evaluation result, and availability of position. This procedure is accordance with the UU no. 13 / 2003 related to the Employment. 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	Complied

		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.	
		Promotion and upgrade are based on employee appraisal conducted annually as outlined in the Employee Assessment Form signed by the employee concerned, approved by the line manager and checked by the General Manager.	
		As of December 2021, there were 16 harvesters based on Memorandum No. #269-277ES-KUK/MEMO/06/21 June 24, 2021.	
		So that until December 2021, there are still 72 PHL harvesters that must be appointed. The PHL harvester appointment program will be implemented until 2025, with details:	
		Semester I of 2022, a promotion for the appointment of 9 harvesters of PHL has been proposed based on Memorandum No. ##/ES-KUK/MEMO/05/22 dated May 10, 2022, then in semester II/2022 will be submitted in November 2022 as many as 9 harvesters,	
		Promotion plan for the appointment of the next PHL harvester per year as many as 18 harvesters until 2025. So that until 2025 there are no harvesters with PHL status.	
3.5.2	Employment procedures are implemented and records are maintained.	PT IIS has established mechanism related to the employees and payments of wages, including:	Complied
		1. SOP recruitment and employee selection No. SOP: AA-HR-305.2-R0 dated 1 February 2009 regarding "penerimaan karyawan baru" (recruitment and selection of employee), explained that: When candidates have passed in the process of selection, next recruitment sends the candidate in full data system averis into HR-it) to be made an agreement work (made 2 duplicate and should be sign by candidates in question.	



For example:

- Employment Contract Perjanjian Kerja Perjanjian Harian Lepas no. 001/PKH/KSL/XI/2022, dated 1 November 2021 on behalf of Eni Maria for position Plantation upkeep, valid until 30 November 2022.
- Employment Contract Perjanjian Kerja Perjanjian Harian Lepas no. 001/PKH/KSL/II/2022, dated 1 February 2022 on behalf of Nurlaila for position Plantation upkeep, valid until 30 February 2023.
- Employment Contract Perjanjian Kerja Perjanjian Harian Lepas no. 144/PKHL/KSA/II/2022, dated 15 February 2022 on behalf of M. Sumarno for position Plantation upkeep, valid until 30 February 2023.
- 2. PT Inti Indosawit Subur Ukui 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 below:
 - Ukui II POM: Memorandum No. 64/MI-PUD/09/2020, dated 25 September 2020.
 - Sei Lala Estate: Memorandum No. 111/ES-KSL/MEMO/XI/2020, dated 18 November 2020.
 - Soga Estate: Memorandum No. 183/ES-KSA/MEMO/XI/2020, dated 14 November 2020.

The policy and procedure has been communicated to workers, especially to temporary workers at Ukui II POM on 25 October 2020, while in Sei Lala Estate socialization conducted on 15 December 2020 to workers of Afdeling I - III, Traksi and administration and at Soga Estate was socialite on 10 December 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). 3. Company has established a mechanism to handle complaint from external party, as written in "Mekanisme Penanganan Keluhan" – complaint handling mechanism (Doc. No.SOP AA-GL- 5005-RO 01) while complaint from internal regulated under "Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan" – Employee' complaint and resolution mechanism (Doc. No.SOP-AA-HR-3008-RO 05). 4. SOP related to the payments No. AA-FA-219.1-R5: "Pengupahan" (Wages) dated 1 May 2016. Described in this SOP, including: - The use of presence card becomes a procedure of using fingerprints - The addition of leave monitoring analysis in the PMS system - Changes in payroll procedures from direct giving to employees to transfers via banks in cooperation with companies - Eliminate potentially fictitious payment characteristics.	
Criteria	3.6: An Occupational health and safety (H&S) plan is documented, effect	tively communicated and implemented.	
3.6.1	(C) All operational activities risks assessed to identify the H&S issues. Mitigation plans and procedures are documented and implemented.	PT Inti Indosawit Subur – Ukui Group 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,	Complied



and motivated to improve performance through continuous improvement program. The policy was also displayed at in public board in Ukui II POM, Soga Estate and Sei Lala Estate

HIRADC for Ukui II POM have been prepared, last review and update 12th January 2022 covering all activities and location for mill scope: office, mill road area, security pos, parking area, all station mill, laboratory, POME installation/IPAL.

The document of OHS Program available under "Program Manajemen K3 PMKS Ukui II PT Inti Indosawit Subur Tahun 2022", such as:

- Established the document of hazard identification, risk assessment and its control
- Meeting on safety committee/P2K3 (monthly basis)
- Report of OHS committee/P2K3 (3 months bases)
- Training of emergency response and preparedness (annually)
- Safety briefing (daily)
- Providing the PPE for all employees
- Inspection on PPE usage
- Training for operator in POM and workshop

Soga and Sei Lala Estate:

Soga Estate and Sei Lala Estate has prepared HIRADC 2022 as per "Dokumen Hazard Identification Risk Assessment and Control Tahun 2022" Kebun Sei Lala and Kebun Soga. Latest review of HIRADC document was done on 1st January 2022 and 8th February 2022. Hazard and risk identification and assessment are covering all activity at Soga Estate and Sei Lala Estate such as: Office, Housing, Material storage (fertilizer, fuel, agrochemical, spare part, building material, etc.), upkeeping (manual upkeeping and chemical upkeeping), harvesting, FFB



transportation, hazardous and domestic waste handling, road maintenance, vehicle maintenance (traksi), etc. The risk analysis and assessment has been performed according to procedure.

Mitigation plan to reduce and minimize the risk impact has been develop by company covering:

- Elimination of risk
- Substitution of material and process
- · Engineering control
- Administrative control
- Personal protective equipment.

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.

Administrative control was performed by employee mutation/rotation, sanction for safety rules violation. Safety inspection was performed regularly to ensure the compliance of safety regulation.

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 - November 2020 for each station.

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:

- 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.

Based on interview and verification, there is no case of positive covid-19 in PT Inti Indosawit Subur – Ukui II POM, Soga Estate and Sei Lala Estate.

Scheme smallholder

Each Koperasi has established the policy related to EHS as per "Kebijakan Koperasi", dated 1 February 2021. 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.

Smallholder manager has prepared hazard identification and risk assessment as per "Document Hazard Identification Risk Assessment and Control (HIRAC) year 2022", updated on 5th January 2022. Risk assessment has calculation of impact value, consequences value, possibility value. All activity, all area have been evaluated.

Mitigation plan to eliminate or reduce the hazard and risk has been develop according to HIRAC as per "Alternatif Kontrol Resiko untuk Tindakan Perbaikan".

An OHS plan year 2022 has prepared as per "Rencana K3 (Keselamatan dan Kesehatan Kerja) majority to provide and control use of PPE, including socialization and monitoring, program such as:

- 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.

		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.	PT Inti Indosawit Subur – Ukui II POM has demonstrated the record of realization the OHS program 2022, such as:	Complied
		Ukui II POM, Soga Estate and Sei Lala Estate – PPE Provision for all workers at mill are demonstrated as per "Bukti Serah Terima Alat Pelindung Diri Pabrik Ukui II". Sample seen:	
		Delivery note of APD for harvesters and fertilizer worker in Sei lala Estate dated 7 th March 2022	
		Delivery note of APD for harvesters and fertilizer worker in Soga Estate dated 4 th March 2022 and 28 th March 2022	
		Delivery note of APD for Ukui II dated 20 th May 2022	
		Based on field visit on 27 th May 2022 for harvesters workers in block D29A in Division IV Soga Estate the risk impact probability was wound/cut and eyes disease, control by using appropriate PPE (eye wear/safety glasses, masker and hand glove) and regular training for them.	
		Discipline of PPE usage monitoring regularly conducted by Estate management to ensure all workers use the appropriate PPE during working. Monitoring record present in "Daftar Pemeriksaan Alat Pelindung Diri (APD)". Sample seen for PPE monitoring of fertilizer workers, spraying workers and harvester period January - March 2022.	
		Report of MCU for all workers in Ukui II POM was conducted by "Focus Clinical Laboratory" on 16 -17 March 2022. The MCU was covered urine test, HSaAg and physical test.	
		Monitoring of emergency response and preparedness facilities, i.e.: fire hydrant. Based on field visit in Ukui II POM, the performance of hydrant was in good condition.	

			inspection report, location orted OK for PPE usage, ar isher).			
Criteria	3.7: All staff, workers, Scheme Smallholders, outgrowers, and contract w	orkers are approp	oriately trained.			
3.7.1	is accessible to all staff, workers, scheme smallholders, and proutgrowers taking into account gender- specific needs, and which a	program, which	nas a department which is is the Asian Agri Learning I program recorded in the and Mill.	institute. The o	department has	Complied
	and includes assessment of the training.	personal record recommend the	ployee data (master of els, the Asian Agri Learning Estate and Mill to particall also evaluate the effective	ng Institute D cipate in a tra	epartment will aining program	
		Administration,	orogram is divided into Environments & Sustainabi so training involving vendor	ility and speci	al certifications	
		The following is Subur, including	a 2021 period training pre:	rogram for PT	Inti Indosawit	
		Training Subject	Operation Unit	Attendance	Schedule	
		Sustainability Awareness	Plasma Ukui, Ukui I & II POM, Soga Estate, Sei Lala Estate		Sept 2021	
		Traceability and Mass Balance	Ukui I & II POM	Staff and Non Staff	Oct 2021	

		HCV Awareness	Plasma Ukui, Ukui I & II POM, Soga Estate, Sei Lala Estate	Staff and Non Staff	Mar 2021	
		Basic Fire	Plasma Ukui, Ukui I & II POM, Soga Estate, Sei Lala Estate	Staff and Non Staff	Feb 2021	
		First Aider	Plasma Ukui, Ukui I & II POM, Soga Estate, Sei Lala Estate	Staff and Non Staff	Aug 2021	
		member FY2022	as established training prog 2, the training consists of: RSPO on 9 August 2022	ram for KUD,	KT and farmer	
		_	y Training on August 9, 2022	2		
		3. Harvest and	d cut fruit training on August	9, 2022		
		4. OSH trainin	g on October 10, 2022			
			ticide Training on November	· ·		
		6. Integrated Pe	est Control Training on Dece	mber 9, 2022		
3.7.2	Records of training are maintained, where appropriate on an individual basis.	Record of training described below	ng are available, such as tra v:	ining attendant	t list, as sample	Complied
		1. First Aider ((PPGD) on January 7, 2022			
		2. Company p	olicy on November 15, 2021	and March 2,	2022	
		3. Basic Safety	y on July 11, 2022			
			n June 22, 2021			
		5. Continuous 2022	Improvement on Septembe	r 19, 2021 and	l February 11,	



		Scheme Smallholder	
		Basic Safety (APD), Soil and Water Conservation, AMDAL and HCV (High Conservation Value) training on September 11, 2021 took place at GOR Basecamp Central Kebun Ukui. The activity was attended by 30 participants who were representatives of the Cooperative (management, farmer groups and the Plasma Trustees Board).	
		Personal data training of staff, workers and scheme smallholders are available, e.g.:	
		Ngatua, Basic Fire training on June 22, 2021	
		Sunarno, Bic Safety training on 11 July 2021	
		Ni Mat Aprianto, Continuous Improvement Training on 19 September 2021.	
		The company has also made recording for all trainings that have been attended by employees in the recording of "Personal Data Training". Some documents can be shown at the time of the audit for example: The Calendar Training document period 2021-2022, the list of participants attending the trainees, and some photographs of the activities at the time of training.	
3.7.3	Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification	SCCS Training has been caried out on 6 April 2022 by head office Jakarta (Welly Joel) through zoom meeting.	Complied
	Standard (SCCS). Training is specific and relevant to the task(s) performed.	Evidence of training can be demonstrated during audit such as attendance list, training material and photo documentation.	
		During interview with weighbridge Clerk, confirmed that she has understanding on RSPO supply chain.	
Criteria	3.8: Supply chain requirements for mills.		

Procedur	e note: all requirements are classified as Critical Indicators. However it w	ill not contribute to suspension if there is more than 5 non-compliance within	n a principle)
3.8.1	Identity Preserved Module A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme. 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.	Management described PT Inti Indosawit Subur — Ukui II POM to implement RSPO Supply Chain Identity Preserved Module. Ukui II POM only received and process FFB from certified company-owned estate and certified scheme smallholder. There was no received FFB from third-party or non-certified FFB supplier. PT Inti Indosawit Subur - Ukui II Palm Oil Mill currently hold a valid RSPO P&C certificate, as certificate number RSPO 565807 with supply chain model is Identity Preserved. All FFB are received from certified supply bases, which are from: • Company-owned estates, e.g.: Soga Estate and Sei Lala Estate; Scheme smallholders consist of 6 (six) smallholder cooperatives (KUD),	Complied
3.8.2	Mass Balance Module	e.g.: KUD Tani Subur, KUD Karya Tani, KUD Mekar Abadi, KUD Tani Maju, KUD Tani Bahagia and KUD Usaha Tani. Not applicable.	Not
3.0.2	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.	Management described PT Inti Indosawit Subur — Ukui II POM to implement RSPO Supply Chain Identity Preserved Module. Ukui II POM only received and process FFB from certified company-owned estate and certified scheme smallholder. There was no received FFB from third-party or non-certified FFB supplier.	Applicable
3.8.3	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.	The estimate annual tonnage for certified FFB, CPO and PK are available in the Estate and Mill annual production budget for 12 months since last surveillance assessment. The FFB tonnage received from all certified supply bases. The estimated tonnage of CPO and PK products that could potentially produce by PT Inti Indosawit Subur – Ukui II POM has been recorded in BSI's public summary report, certificate and RSPO IT Platform.	Complied

		Below are the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year 2022: Forecast volume (Aug 2021 – July 2022) FFB: 276,238 MT CPO: 59,207 MT (OER: 21.43%) PK: 15,193 (KER: 5.50%) Actual production volume (March 2021 – April 2022) FFB: 291,804 MT CPO: 60,432 MT (OER: 20.93%) PK: 15,966 MT (KER: 5.92%) Actual sold volume (March 2021 – February 2022) CPO: 51,209.20 MT PK: 13,818.82 MT	
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	PT. Inti Indosawit Subur – Ukui 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 – Ukui II POM has meet all registration and reporting requirements. RSPO IT Platform/PalmTrace account RSPO_PO1000002491.	Complied
3.8.5	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: a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.	PT. Inti Indosawit Subur – Ukui II POM can demonstrate procedures as follow: • 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 Buatan Estate and Smallholder, processing up to shipping of CPO and PK as well as daily production report. The procedure also regulates the internal	Complied



- b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).
- c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill's procedures for the implementation of this standard.
- d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill.

- 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 Sustainability will inform to Certification Body in the case of projected overproduction.
- SOP for mill operation Mill Policy Manual:
 - 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	
		PT. Inti Indosawit Subur – Ukui II POM is able to demonstrate complete and up-to-date records and report demonstrating compliance with the supply chain's general requirement and modular requirement, including training records.	
		As per Procedure of Traceability (AA-MPM-OP-1400.17-R7), 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.	
		PT. Inti Indosawit Subur – Ukui 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.	
3.8.6	 i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill; 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 organisation. 	PT. Inti Indosawit Subur — Ukui 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 No: AA-SOP-ES-6001-R5 dated 1 August 2020;	Complied



	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	Chapter 4.0 stated that Internal audit conducted minimum once a year considering the critical area. Latest internal audit conducted on 18 - 20 November 2021. The report available under document "Internal Audit Sustainability Integrasi".	
	internal audit records and reports.	Management review dated 27 November 2021, was attended by Technical Controller, POM Manager, Sustainability Staff. Document of Management Review available and recorded in minutes of meeting:	
		 Result of internal audits, covering RSPO Supply Chain Certification Standard: Internal audit for Ukui II POM carried out 18 – 20 November 2021 - all findings closed. Customer feedback: No complaint received related to CSPO and/or CSPK product. Status of preventive and corrective actions: status of preventive and corrective action related to internal audit have been discussed during management review meeting. This including opportunity for improvements. Follow-up actions from management reviews: Recommendations for improvement: Maintain customer satisfaction by enhance CPO and PK quality Mill maintenance enhancement Transporting agreement renewal according to agreement. 	
3.8.7	Purchasing and Goods In 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.	PT Inti Indosawit Subur - Ukui II POM use supply chain model Identity Preserved, therefore the mill not received and processed non-certified FFB. Procedure of Traceability (AA-MPM-OP-1400.17.R7) with latest revision dated 1 Oct 2019 described that KTU who verify and documented tonnage and source of certified FFB in "Laporan Harian Pabrik", then Mill Manager who verify and approve it. The procedure also stipulate handling of nonconforming FFB and or documents.	Complied



All FFB are received from certified supply bases, which are from:

• Company-owned estates, e.g.: Soga Estate and Sei Lala Estate; Scheme smallholders consist of 6 (six) smallholder cooperatives (KUD), e.g.: KUD Tani Subur, KUD Karya Tani, KUD Mekar Abadi, KUD Tani Maju, KUD Tani Bahaqia and KUD Usaha Tani.

The procedure also mentioned mechanism that Head of Environmental and Sustainability will inform to certification body if there is case of projected overproduction.

Data verified of FFB receiving:

- 1. Daily Production Report Ukui II POM: "Laporan Harian Pabrik" dated 31 Desember 2021 and 27 May 2022; described FFB received from Soga Estate and Sei Lala Estate, and Scheme Smallholder (Plasma Ukui), total ytd 2021 is 258,151,069 MT and to date 27 May 2022 is 90,956.74 MT;
- 2. Weighbridge card No.PUDA122207755 dated 27th May 2022; commodity is FFB certified; source is Soga Estate Afd. 3 Block C98e; amount 234 bunches; net weight is 7,500 kg; Certificate No. RSPO 565807; DN #KSAPMU520220527202209; transporter internal, vehicle number BM 9975 TZ; driver Rukiyadi;
- 3. Weighbridge card No.PUDA122207752 dated 27st May 2022 commodity is FFB certified; source is Sei Lala Estate Afd. 1 Block A89d; amount 80 bunches; net weight is 2,310 kg; Certificate No. RSPO 565807; DN #KSLPMO220220527202506; transporter internal, vehicle number BM 9974 TZ; driver Hermansyah;
- Record of FFB received from KUD Mekar Abadi; Followed up by weighbridge card No.PUDA222204872, dated 23th May 2022; commodity is FFB certified; source is Kebun Plasma KUD Mekar Abadi (Scheme Smallholders); amount 330 bunches; net weight is 9,151 kg; Certificate No. RSPO 565807; DN#67/Plasma; transporter by

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		plasma, driver: Godek. 5. Record of FFB received from KUD Tani Bahagia; Followed up by weighbridge card No.PUDA222204812, dated 23 th May 2022; commodity is FFB certified; source is Kebun Plasma KUD Tani Bahagia (Scheme Smallholders); amount 349 bunches; net weight is 9,978 kg; Certificate No. RSPO 565807; DN #30/Plasma; transporter by plasma. 6. Record of FFB received from KUD Usaha Tani; Followed up by weighbridge card No.PUDA222204917, dated 24 th May 2022; commodity is FFB certified; source is Kebun Plasma KUD Usaha Tani (Scheme Smallholders); amount 215 bunches; net weight is 8,057 kg; Certificate No. RSPO 565807; DN #38/Plasma; transporter by plasma, driver: Mail. Since latest audit recertification there is no overproduction reported to CB, it is also confirmed during this surveillance assessment that there is no overproduction according to production data of estate and mill. Ukui II POM monitors the status of supplied raw material from certified sources through Book Keeping system in monthly basis. In case on nonconforming raw material entering the process, Ukui II POM has the	
		mechanism to handle non-conforming material and/or document. Ukui II POM demonstrated the simulation on recall of non-conforming material. Up to this moment, there has been no case of non-conforming material and/or documents entering the process.	
3.8.8	Sales and Goods Out The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil	Traceability AA-MPM-OP-1400.17.R7 with latest revision dated 1 Oct 2019. The procedures cover traceability of palm products (CPO and PK) since receiving of fresh fruit bunches from Soga Estate, Sei Lala Estate and 6 scheme smallholder cooperatives, processing of up to shipping of CPO and PK as well as Daily production report Ukui II POM.	Complied
		PT Inti Indosawit Subur – Ukui II POM has made Shipping Announcement in RSPO IT Platform to announce sales of RSPO certified CPO or PK per	

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palm products (for example, delivery notes, shipping documents and specification documentation):

- a) The name and address of the buyer;
- b) The name and address of the seller;
- c) The loading or shipment / delivery date;
- d) The date on which the documents were issued;
- e) RSPO certificate number:
- f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations);
- g) The quantity of the products delivered;
- h) Any related transport documentation;
- i) A unique identification number.

group of shipments (DO). During this surveillance period Ukui II POM sold certified product in form of CSPO and CSPK.

Sales and goods out documents seen are as follows:

PalmTrace Shipping Announcement: TR-65aa5505-b3d3; dated 31st March 2022, member ID RSPO_PO1000002491; buyer PT Inti Sari Dumai Sejati; product CSPO, supply chain model IP; volume 2,115.15 MT. confirmation date 05 May 2022.

Sample Sales contract No. 03004/CC10/02/21 dated 2 March 2021; Seller: PT Inti Indosawit Subur, address: JL. MH. Thamrin No. 31 Lt. 2 Kebon Melati, Tanah Abang, Jakarta Pusat, DKI Jakarta Raya 10230; Buyer: PT Sari Dumai Sejati, address: JL. MH. Thamrin No. 31 Lt. 2 Kebon Melati, Tanah Abang, Jakarta Pusat, DKI Jakarta Raya; Comodity: CSPO; Supply Chain Model: Identity Preserved; Specification: FFA max 5% amd M+I max 0.5%; Quantity: 800 MT; Delivery: by Ukui II POM to PT SDS Lubuk Gaung.

Sample DO number: 03004/DC10/02/21, dated 2 March 2021; Seller: PT Inti Indosawit Subur – Ukui II POM; Buyer: PT Sari Dumai Sejati, Lubuk Gaung via Rengat Port; Commodity: CSPO; Quantity: 800 MT Sample Weighbridge Card No.PUDC122100339 dated 11th March 2022; product is CPO certified RSPO; Nett weight is 22,860 kg; SC model is Identity Preserved; certificate is RSPO 565807; transporter PT Sumber Kencana; vehicle number BM 9308 BU; driver Suriyanto; deliver to PT Sari Dumai Sejati.

PalmTrace Shipping Announcement: TR-bb376751-70c1; dated 28th
October 2021, member ID RSPO_PO1000002491; buyer PT Padang
Raya Cakrawala; product: CSPO, supply chain model IP; volume
5,007.91 MT. confirmation date 02 February 2022.

Sample Sales contract No. 10048/CC10/02/21 dated 28 October 2021; Seller: PT Inti Indosawit Subur, address: JL. MH. Thamrin No. 31 Lt. 2 Kebon Melati, Tanah Abang, Jakarta Pusat, DKI Jakarta Raya

		10230; Buyer: PT Padang Raya Cakrawala, address: JL. Palembang Kav 35-37 RT 004 RW 001, Kebon Melati Tanah Abang Jakarta Pusat, DKI Jakarta; Comodity: CSPO; Supply Chain Model: Identity Preserved; Specification: FFA max 5% amd M+I max 0.5%; Quantity: 1,500 MT; Delivery: by Ukui II POM to PT Padang Raya Cakrawala. Sample DO number: 10048/DC10/02/21, dated 28 october 2021; Seller: PT Inti Indosawit Subur – Ukui II POM; Buyer: PT Padang Raya Cakrawala via Teluk Bayur Port; Commodity: CSPO; Quantity: 1,500 MT Sample Weighbridge Card No.PUDC121102141 dated 16 th December 2021; product is CPO certified RSPO; Nett weight is 28,530 kg; SC model is Identity Preserved; certificate is RSPO 565807; transporter PT Trans Jaya Pertama; vehicle number BK 9962 EL; driver: Faisal Purba; deliver to PT Padang Raya Cakrawala. PalmTrace Shipping Announcement: TR-a1d2c737-fcf1; dated 14 th September 2021, member ID RSPO_PO1000002491; buyer PT Inti Idnosawit Subur – Ukui I KCP; product: CSPK, supply chain model IP; volume 4,222.12 MT. confirmation date 21 th September 2021. Sample DO number: 07305/DC10/13/21, dated 19 July 2021; Seller: PT Inti Indosawit Subur – Ukui II POM; Buyer: PT Inti Indosawit Subur – Ukui I KCP; Commodity: CSPK; Quantity: 500 MT Sample Weighbridge Card No.PUDC221100401 dated 29 th July 2021; product is PK certificate is RSPO 565807; transporter PT Buana Jaya Bersamaa; vehicle number BK 9542 RC; driver: Supriyadi; deliver to PT Inti Indosawit Subur – Ukui I KCP.	
3.8.9	Outsourcing Activities 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	PT. Inti Indosawit Subur – Ukui II POM not outsource its milling activities however operate subcontractor for CPO and PK transporter. The transporter for RSPO certified sustainable CPO delivery were carried out by several contractors. These contractors were appointed, contracted and instructed by PT Inti Indosawit Subur – Ukui II POM.	Complied



independent third party complies with relevant requirements of this RSPO Supply Chain Certification.

- ii) The mill shall ensure the following:
 - a) The mill has legal ownership of all input material to be included in outsourced processes
 - b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.
 - c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.
 - 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.

PT Inti Indosawit Subur – Ukui II POM control the outsourced transporter by "Surat Perintah Kerja (SPK)" and "Daftar Periksa Kesiapan Kerja Pengiriman". SPK covered information as explain in indicator 5.5.2 b. while "Daftar Periksa Kerja" is the tool to control the transporter:

- Before shipping (completeness of vehicle including legality and safety, tank condition, faucet out, main hole tank, hinge/key lock faucet out);
- After shipping (completeness of vehicle including legality and safety, tank condition, faucet out, main hole tank, hinge/key lock faucet out, seal number and seal condition);
- The quantity of CPO monitored by Weighbridge Card and SPK (with 0.20% tolerance).
- PT. Inti Indosawit Subur Ukui II POM having legal ownership of material being transported by appointed outsourced companies.
- PT. Inti Indosawit Subur Ukui II POM have a contract agreement with transporter as below:
- "Perjanjian Pengangkutan Nomor: 06/VI/SKI-IIS/2020" dated 4 June 2020 between PT Inti Indosawit Subur and PT Sumber Kencana. Contract transport for CPO & PK.
- "Perjanjian Pengangkutan Nomor: 05/VI/JSA-IIS/2020" dated 4 June 2020 between PT Inti Indosawit Subur and CV Jasa Sahabat Abadi. Contract transport for CPO & PK.
- "Perjanjian Pengangkutan Nomor: 02/VI/JP-IIS/2020" dated 4 June 2020 between PT Inti Indosawit Subur and CV Jaya Pertama. Contract transport for CPO & PK.
- "Perjanjian Pengangkutan Nomor: 03/VI/BJB-IIS/2020" dated 4 June 2020 between PT Inti Indosawit Subur and PT Buana Jaya Bersama. Contract transport for CPO & PK.
- "Perjanjian Pengangkutan Nomor: 01/1/UJE-IIS/2022" dated 3 April

		2022 between PT : Contract transport		ır and PT Us	saha Jaya Express.		
		Contract agreement According to contract a memenuhi persyaratar bahan baku dan berse dan auditor pihak ekste kedua jika diperluka certification system of willing to be audit by in external auditor from 0					
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	PT Inti Indosawit Subu details of the transport "List Kontraktor Penga					
		Name of Transporter	Address	Contact Person	Phone Number		
		CV Sumber Kencana	JI Veteran No 77, Rengat, Riau	Djohor Djudin	08127580***/ 085278043***		
		CV Jasa Sahabat Abadi	Jl Besar Kisaran, Desa Sidomulyo, Kec. Pulo Bandring, Medan	Darmin Tanudjaja	085372344***		
		CV Jaya Pratama	Jl. Jenderal Sudirman, Dusun VI, Kel. Sidomulyo Kec. Pulo Bandring, Kisaran, Sumatera Utara.	Anwar	08197477***		

		PT Buana Jaya Bersama	Pekanbaru, Riau	Eltono	082169511*** /082170430** *	
		PT Usaha Jaya Express	Jl. Jenderal Sudirman, Dusun VI Kel. Sidomulyo, Kec. Pulo Bandring, Kisaran, Sumatera Utara	Fransiska Karina	08535596***	
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	PT Inti Indosawit Subuthe name and contaassessment. The site committed to				
		any new contractors AA-MPM-OP-1400.17-R			"SOP Traceability	
3.8.12	Record keeping 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.	Based document review demonstrate complete covering all aspects requirements.				
	ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory	Records and report ver Sample of Mill Daily			2021 and 27 th May	



- requirements and be able to confirm the certified status of raw materials or products held in stock.
- 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.
- iv) For Mass Balance Module, the mill:
 - 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.
 - 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.
 - 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).

2022

- Sample of Weighbridge Card for FFB
- Sample of Weighbridge Card for CPO
- Sample of Weighbridge Card for PK
- Delivery Order CPO and PK
- Sales contract
- Shipping Announcement
- Mass balance report
- Internal audit RSPO SCCS and Management review

Based on procedure of Traceability (AA-MPM-OP-1400.7.R7) dated 1 Oct 2019, section 6.9 requires that all records and reports related to traceability and book keeping are retained for a period of 10 years.

PT Inti Indosawit Subur – Ukui II POM is able to provide estimate volume of CPO and PK in a year period as in "Distribusi Produksi Bulanan Anggaran Tahun 2020" consists estimate of FFB receiving from certified source (Soga Estate, Sei Lala Estate and Ukui Plasma), extraction rates, processing capacity, working hour and utilization.

PT Inti Indosawit Subur – Ukui II POM record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis as per "Book Keeping CPO & PK".

Ukui II POM has also keep an up to date record of the FFB volume received, CPO and PK produced over a period of twelve (12) months.



3.8.13 Extraction Rate

The oil extraction rate (OER) and the kernel extraction rate(KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.

PT Inti Indosawit Subur – Ukui II POM is able to provide estimate volume of CPO and PK in a year period as in "Distribusi Produksi Bulanan Anggaran Tahun 2021/2022" consists estimate of FFB receiving from certified source (Soga Estate, Sei Lala Estate and Ukui Plasma), extraction rates, processing capacity, working hour and utilization.

The actual conversion ratio is monitored on daily basis through sounding result and documented in daily report. PT Inti Indosawit Subur – Ukui II POM able demonstrate the work instruction for analysis of oil content.

OER and KER are estimated based on associated inputs and upon past experience (previous year FFB, CPO and PK production).

The site has set OER for budget 2022 (Jan - Dec) as 21.32% and KER as 5.50%. Budget 2021 (Jan - Dec) as 21.43% and KER as 5.50%.

Budget FFB process 2022: certified 240,831.68 MT, non certified: 0 MT Budget CPO production 2022: certified 51,346.28 MT, non certified 0 MT. Budget PK production 2022: certified 13,245.74 MT, non certified 0 MT.

Previous Budget vs realization on 2021 (Jan – Dec) as below:

Description	Budget	Realization
FFB Certified	276,238.24	258,151.07
FFB Non Certified	0	0
CPO Certified	59,206.82	53,646.12
CPO Non Certified	0	0
PK Certified	15,193.10	14,149.06
PK Non Certified	0	0
OER	21.43	20.78
KER	5.50	5.48

Complied

3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	The actual conversion ratio is monitored on daily basis through sounding result and documented in daily report. PT Inti Indosawit Subur – Ukui II POM able demonstrate the work instruction for analysis of oil content.	Complied
		PT. Inti Indosawit Subur – Ukui II POM is able to demonstrate the work instruction for analysis of oil content.	
		Based on Laporan Harian Produksi dated 31 December 2021, the sounding result and production report shows that actual conversion ratios from FFB into CPO are:	
		a. OER For FFB from Soga Estate: 22.06%	
		b. OER For FFB from Sei Lala Estate: 21.59%	
		c. OER For FFB from Ukui II Plasma: 19.51%	
		And actual conversion ratios from FFB into PK are:	
		a. KER For FFB from Soga Estate: 5.48%	
		b. KER For FFB from Sei Lala Estate: 5.48%	
		c. KER For FFB from Ukui II Plasma: 5.48%	
		Actual conversion ratios year 2022 to date 27 th May 2022 from FFB into CPO are:	
		a. OER For FFB from Soga Estate: 21.67% (budget 22.60%)	
		b. OER For FFB from Sei Lala Estate: 21.22% (budget 22.10%)	
		c. OER For FFB from Ukui II Plasma: 19.14% (budget 19.95%)	
		And actual conversion ratios from FFB into PK are:	
		a. KER For FFB from Soga Estate: 5.55% (budget 5.50%)	
		b. KER For FFB from Sei Lala Estate: 5.50% (budget 5.50%)	
		KER For FFB from Ukui II Plasma: 5.50% (budget 5.50%)	



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.		Not applicable. PT IIS – Ukui II POM implementing Mass Balance Model for Supply Chain.					
i) Shipping Announcement in the RSPO IT platform shall be carried ins			awit subur – Uk ace transaction ::					Complied
	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.	Transaction ID	Buyer	Product	Supply Chain Model	Volume	Status	
	ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall	TR-65aa5505- b3d3	PT. Sari Dumai Sejati	CSPO	Identity Preserved	2112.15	Confirmed	
	be removed in the RSPO IT platform.	TR-dead6b46- f7b6	PT. Sari Dumai Sejati	CSPO	Identity Preserved	2210.16	Confirmed	
		TR-1da5ad36- 20e2	PT. Sari Dumai Sejati	CSPO	Identity Preserved	2115.36	Confirmed	
		TR-3c55924c- 16d5	Ukui I Kernel Crushing Plant	CSPK	Identity Preserved	3058.28	Confirmed	
		TR-68e760ac- 73ba	PT. Sari Dumai Sejati	CSPO	Identity Preserved	599.94	Confirmed	
		TR-18c06ad8- 89bf	PT. Sari Dumai Sejati	CSPO	Identity Preserved	5258.99	Confirmed	
		TR-2b17c69d- d4a2	PT. Sari Dumai Sejati	CSPO	Identity Preserved	1407.45	Confirmed	
		TR-52379a33- 267f	PT. Sari Dumai Sejati	CSPO	Identity Preserved	1928.79	Confirmed	



TR-bb376751- 70c1	PT Padang Raya Cakrawala	CSPO	Identity Preserved	5007.91	Confirmed	
TR-e7ab4573- 327d	PT Padang Raya Cakrawala	CSPO	Identity Preserved	500	Confirmed	
TR-85c1b3d5- b399	Ukui I Kernel Crushing Plant	CSPK	Identity Preserved	3577.35	Confirmed	
TR-49086c3d- 86e7	PT. Sari Dumai Sejati	CSPO	Identity Preserved	4419.27	Confirmed	
TR-1581ece7- 3c0c	PT. Sari Dumai Sejati	CSPO	Identity Preserved	1899.34	Confirmed	
TR-8e677d6c- 763d	PT. Sari Dumai Sejati	CSPO	Identity Preserved	4489.62	Confirmed	
TR-a1d2c737- fcf1	Ukui I Kernel Crushing Plant	CSPK	Identity Preserved	4222.12	Confirmed	
TR-e34c9030- 5ae2	PT. SARI DUMAI SEJATI	CSPK	Identity Preserved	257.96	Confirmed	
TR-cb662693- 5cc3	PT Padang Raya Cakrawala	CSPO	Identity Preserved	1799.9	Confirmed	
TR-ba029c3c- 1aa5	PT. Sari Dumai Sejati	CSPO	Identity Preserved	4414.96	Confirmed	
TR-b6dd833e- 19a0	PT. Sari Dumai Sejati	CSPO	Identity Preserved	4308.1	Confirmed	
TR-a682224b- 16cb	PT. Sari Dumai Sejati	CSPO	Identity Preserved	4891	Confirmed	
TR-fe179e9d- 6629	Ukui I Kernel Crushing Plant	CSPK	Identity Preserved	519.56	Confirmed	

		TR-85216d53- 0ce4 TR-255ae7f3-	Ukui I Kernel Crushing Plant Ukui I Kernel	CSPK CSPK	Identity Preserved Identity	686.53 2143.24	Confirmed Confirmed	
		017d TR-0d3f1e23- 0de9	Crushing Plant PT. Sari Dumai Sejati	CSPO	Preserved Identity Preserved	7778.22	Confirmed	
		from their Pale Stock removed transaction ca	awit Subur – Uk mTrace accoun d for CSPO solo an be demons : ST-TR-a6afbe	t with vo I as ISCC trated or	lume remove certified. To the Palmi	/e: 1,083. The eviden Trace tra	96 MT CSPO; ace of remove nsaction with	
3.8.17	Claims 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.	PT. Inti Indosawit Subur – Ukui 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.						Complied
General	corporate communications							
4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	of Ukui II PON and directly re	awit Subur (with I is highlighting ferring to RSPC tp://www.asiar	g its com) website	mitment to . The corpor	the princi	ples of RSPO,	Complied
4.2	 In corporate communications a member is allowed to: Display its RSPO membership status Display the RSPO web address (www.rspo.org) State that the member supports the work of the RSPO State the member's history with regard to the RSPO. Use the RSPO trademark to promote its membership of the RSPO. 	a. Display its (with the status. Th Roundtable	awit Subur (wit RSPO membe brand Asian Age e CH only sta e of Sustainab n for our estate	rship sta gri), did ted "In le Palm	tus: No, PT not display 2006, beca Oil. We re	. Inti Ind its RSPO me a me	losawit Subur membership ember of the	Complied

	Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at www.rspo.org' where the link must lead to the member's	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.	
	profile page.	c. State the member supports the work of the RSPO: Not in direct manner. In the website, PT. Inti Indosawit Subur (with the brand Asian Agri), "In 2006, became a member of the Roundtable of Sustainable Palm Oil. We received out first RSPO certification for our estate in 2010."	
		d. State the member's history with regards to the RSPO: Not in direct manner. In the website, In the website, PT. Inti Indosawit Subur (with the brand Asian Agri), "In 2006, became a member of the Roundtable of Sustainable Palm Oil. We received out first RSPO certification for our estate in 2010, and in 2012, the certification for our smallholder scheme."	
		Use of RSPO Trademark to promote its membership of the RSPO: No, PT. Inti Indosawit Subur (with the brand Asian Agri), did not use RSPO trademark in its corporate communication such in website.	
4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership	No, PT. Inti Indosawit Subur (with the brand Asian Agri), did not display its RSPO membership status.	Complied
	by itself implies the selling of RSPO-certified oil palm products.	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.	
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified	No, PT. Inti Indosawit Subur (with the brand Asian Agri), did not display its RSPO membership status.	Complied
	content of oil palm products in the member's own products.	It is clear that the statement are clear and did not mislead consumers or other stakeholders as to the certified content of oil palm products in the PT. Inti Indosawit Subur – Ukui II POM own products.	

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
Busines	s to business communications		
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	There was no use of RSPO trademark and/or RSPO corporate logo in business to business communication related to RSPO certified product; between PT. Inti Indosawit Subur – Ukui II POM and their buyers.	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 – Ukui I POM followed the requirements of the RSPO SCCS. PT. Inti Indosawit Subur – Ukui II POM stating the supply chain model and certificate number under which the claim is being made.	Complied
5.3	 Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options: 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. b) If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2. 	PT. Inti Indosawit Subur – Ukui II POM is not a distributor and/or wholesaler. Not applicable.	Not Applicable
5.4	A certified member can provide information to its customers detailing the presence of certified palm oil contained within a product even if it is not eligible for a product-specific under RSPO rules. The end product	PT. Inti Indosawit Subur – Ukui II POM is not producing or selling end- product to consumer. No labelling on product whatsoever. Not applicable.	Not Applicable

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	must not be labelled as certified or sold in such a way that implies RSPO certification. 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.		
Busine	ss 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.	Not applicable PT Inti Indosawit Subur – Ukui II POM is producing and selling CSPO and CSPK; and not making a business to consumer communication.	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.	Not applicable. PT Inti Indosawit Subur – Ukui II POM is not using RSPO trademark and/or RSPO label. PT. Inti Indosawit Subur – Ukui II POM is producing and selling CSPO and CSPK; and not making a business to consumer communication.	Not Applicable
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.	Not applicable. PT Inti Indosawit Subur – Ukui II POM is not using RSPO-certified on-pack claim. PT. Inti Indosawit Subur – Ukui II POM is producing and selling CSPO and CSPK; and not making a business to consumer communication.	Not Applicable
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	Not applicable. PT Inti Indosawit Subur – Ukui II POM is not making any claim related to their RSPO membership status. PT. Inti Indosawit Subur – Ukui II POM is producing and selling CSPO and CSPK; and not making a business to consumer communication.	Not Applicable
6.5	Members shall not communicate to consumers' information about their suppliers' RSPO membership status.	Not applicable.	Not Applicable

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		PT Inti Indosawit Subur — Ukui II POM is not making any information about their supplier's RSPO membership status. PT. Inti Indosawit Subur — Ukui II POM is producing and selling CSPO and CSPK; and not making a business to consumer communication.	
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.	Not applicable. PT Inti Indosawit Subur – Ukui II POM is not using RSPO trademark and/or RSPO label.	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.	Not applicable. PT Inti Indosawit Subur – Ukui II POM is not using RSPO trademark and/or RSPO label.	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.	Not applicable. PT Inti Indosawit Subur — Ukui II POM is not retailers or food service company.	Not Applicable

MODULE A – IDENTITY PRESERVED & SEGREGATED SPECIFIC RULES (delete if not applicable)

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Certified o	oil palm content (IP)		
	For IP, 95% or above of the oil palm content must be RSPO IP-certified.	The General Chain of Custody requirements of the RSPO Supply Chain Standard is applicable for PT Inti Indosawit Subur – Ukui II POM.	Complied
		Ukui II POM physically process RSPO Certified FFB into Certified Sustainable Palm Oil (CSPO) and Palm Kernel (CSPK).	
		Ukui II POM does not process non-certified FFB, therefore the applicable RSPO SCC model is Module Identity Preserved.	
		Therefore 100% of the CPO and PK produced are RSPO IP-certified.	
	For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.	PT Inti Indosawit Subur – Ukui II POM does not process non-certified FFB, therefore the applicable RSPO SCC model is Module D - CPO Mills: Identity Preserved.	Not Applicable
		Not applicable.	
	product, the reason for this must be fully justified and an action plan	The General Chain of Custody requirements of the RSPO Supply Chain Standard is applicable for PT Inti Indosawit Subur – Ukui II POM.	Not Applicable
\	for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the volume of	Ukui II POM physically process RSPO Certified FFB into Certified Sustainable Palm Oil (CSPO) and Palm Kernel (CSPK).	
	non-certified oil palm products must be covered by the purchase of RSPO Credits of equivalent volume.	Ukui II POM does not process non-certified FFB, therefore the applicable RSPO SCC model is Module Identity Preserved.	
		Therefore 100% of the CPO and PK produced are RSPO IP-certified.	
Labelling a	and trademark (IP)		
\	Members are allowed to use the RSPO label in one of the following ways: RSPO trademark which includes the tag 'CERTIFIED' or	Use of RSPO Trademark to promote its membership of the RSPO: No, PT Inti Indosawit Subur (with the brand Asian Agri), did not use RSPO trademark in its corporate communication such in website.	Not Applicable
	 RSPO trademark which includes the tag 'This product contains certified sustainable palm oil'. Wherever a RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. 	When confirming the sales of certified oil palm products, PT Inti Indosawit Subur – Ukui II POM followed the requirements of the RSPO SCCS. PT Inti Indosawit Subur – Ukui II POM stating the supply chain model and certificate number under which the claim is being made.	

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	Font must be Calibri, font size must be at least 4pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack.		
Messagii	ng (IP)		
	Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements:	No, PT Inti Indosawit Subur (with the brand Asian Agri) did not display its RSPO membership status, therefore the applicable RSPO SCC model is	Not Applicable
	The oil palm products contained in this product have been certified to come from RSPO sources. www.rspo.org	Module D - CPO Mills: Identity Preserved.	
	By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: www.rspo.org		
	RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. www.rspo.org		
	Certified sustainable oil palm products can be traced back to RSPO- certified mills and plantations. www.rspo.org		
	The entire supply chain is monitored by independent, RSPO- accredited auditors. www.rspo.org		
	RSPO-certified sustainable palm oil has been produced to stringent environmental and social criteria. www.rspo.org		
	References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records.		
Principle	4: Respect community and human rights and deliver benefit		
Respect c	ommunity rights, provide equal opportunities, maximise benefits from er	gagement and ensure remediation where needed.	
Criteria 4	4.1: The unit of certification respects human rights, which includes respe	ecting the rights of Human Rights Defenders.	
4.1.1	(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, supply chain	The Company already has a Policy to respect human rights as outlined in the Corporate Policy issued by the Managing Director of Asian Agri on 1 December 2014. Point 13 of the policy states that " <i>The Company respects</i> "	Complied



and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces. human rights by treating all employees fairly, in recruitment, performance assessment, conditions and work environment and representation irrespective of tribe, caste, nationality, religion, disability, gender, sexual orientation, union membership, political affiliation and/or age".

Separately, PT IIS – Ukui Group has had a Policy regarding to Human Right Defender (HRD) published through the Memorandum of Group Manager PT Inti Indosawit Subur No. 005/GM-KUK/MEMO/02/20 dated 10 February 2020, the policy mentioned that: "...Prohibited for retaliation, intimidation and harassment for whistleblowers/human rights defenders"..., this policy has been disseminations to all workers as follow:

- a. In 2022, dissemination has performed on 18 April 2022 attended by 24 personnel from Sei Lala and Soga Estate.
- b. Date 01 January 2022, dissemination has performed in Sei Lala and Soga Estate and attended by 25 participants, on 2 February 2022 attended by 25 participants, on 7 March 2022 attended by 25 participants and on 4 April 2022 attended by 25 participants.
- c. Dated 11 April 2022, dissemination has conducted in Sei Lala and Soga Estate attended by 14 participants.
- d. Date 17 January 2022, dissemination was conducted in Ukui II Mill and Attended by 30 participants.
- e. On 2 March 2022 (attended by 24 participants of workers and contractors) and on 13 April 2022 dissemination to 19 workers and on 18 April 2022 to 22 contractors (suppliers and vendors).

Scheme Smallholder:

Plasma Ukui II already has policies related to human rights as outlined in the ICS Group Manager Policy - Palm Plantations PT Inti Indosawit Subur

		Kebun Plasma Ukui, on point 9 it is explained that: Ukui Plasma respects human rights and human rights defenders (human right defender) by not treating impulse, intimidation and violence against human rights defenders by all KUD employees and farmers. This policy has been conveyed to all KUD employees and farmers as well as the head of farmer groups as well, on August 11, 2021.	
4.1.2	The unit of certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations.	Specific Guidance for 4.1.1: If any criminal act or security disturbance occurred to the unit of certification then reporting to the government and security apparatus is not a retaliatory measure, but a part of a valid legal process when it has been preceded by stages of conflict resolution such as investigation, verification, negotiation and mediation.	Complied
Criteria	4.2: There is a mutually agreed and documented system for dealing with	complaints and grievances, which is implemented and accepted by all affect	cted parties.
4.2.1	(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.	Unit of Certification has established mechanism to handle complaint and grievances, "SOP Penanganan Keluhan dari Eksternal No.AA-GL-5005-R0 01" explains mechanism to resolve external complaint; "SOP Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan No. AA-HR-308 0.5R0" related to internal grievance mechanism, for employee, Company also provides comment box at each unit office; and there is a mechanism for land dispute resolution; "SOP Penanganan Konflik Lahan AA-GL-5003.1-R1" effective 22/08/2011 related to land conflict. The procedure covers land dispute handling mechanism, negotiation process, and verification upon legal ownership evidence up to land compensation. Should negotiation process fail, any land dispute will be processed through legal/litigation mechanism. During the process, a complete record is maintained. Based on mechanism, public relation officer will receive information of any complaint, grievance and land dispute/claims and records under the logbook.	Complied



There is no land dispute noted, based on stakeholder consultation.

Resolves disputes system which developed by unit of certification has follows the RSPO Policy on respect for Human Right Defender (HRD), it was mentioned in the Human Rights Policy dated 1 December 2019 and signed by Managing Director. Details on requirements to protect the rights of Human Right Defenders, including complainants, whistleblowers and community spokespersons, are set out in "Memorandum No: 005/GM-KUK/MEMO/02/20 dated 10 February 2020 "Kebijakan Melarang Adanya Tindakan Balas Dendam, Intimidasi, dan Pelecehan untuk Pelapor/Pembela Hak Asasi Manusia" (Human Right Defender). The external grievances and complaint handling was stipulated as per "Mekanisme Keluhan" which provided in the Website of Asian Agri and can be accessed by all stakeholder of Asian Agri at https://www.asianagri.com/id/panel-keberlanjutan/keluhan-pengaduan. Asian Agri stakeholders include but are not limited to the Government, farmers, suppliers, vendors, academics, NGOs, media, etc., provided different complaint channels to report their complaints/findings. Reporters can submit complaints and information related to business violations, corruption, harassment, criminal acts, the environment and others.

Plasma Ukui (Scheme Smallholder):

The Smallholder Manager has established mechanism for communication and consultation "*Mekanisme Komunikasi dan Konsultasi*" dated 16 January 2017, shaped flow Chart that describes the process of incoming information requests up to the responses provided. Each smallholder member has "*Buku Panduan dan Catatan Petani Plasma*", whereas explains the flow process of communication. Both of communication by written or verbal communication to group management are acceptable. For internal communication, The Smallholder Manager has prepared the

		procedure on "Komunikasi Internal Group Sertifikasi". SOP No. 007/DOK/SOP/PT IIS KLU-AA/2016 dated 26 November 2016. The SOP describes the relevant internal communication mechanisms of Group members, Extension Officers, Smallholder Manager and Group Managers. The Group Manager is responsible for responding to the Group's internal communications. Based on interview with sample of smallholders in KUD Tani Subur, KUD Karya Tani, dan KUD Mekar Abadi, there is no dispute raise to the company.	
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.	 Unit of Certification established mechanism to handle complaint and grievances, within the procedures: "SOP Penanganan Keluhan dari Eksternal No. AA-GL-5005-R0 01" explains mechanism to resolve external complaint; "SOP Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan No. AA-HR-308 0.5R0" related to internal grievance mechanism for employee. SOP Penanganan Keluhan Masyarakat No: AA-GL-510.1-R0, dated 1 January 2013, stipulate as follow: 4.1 Reporting Public Complaints 4.1.1 General Scope: "Procedures for handling complaints from Concerned Parties including organizations, people, groups or institutions". In order for the Company to respond appropriately to the Parties' complaints in order to be identified, anonymous questions or complaints (without identity / cannot be traced by their identity) cannot be accepted. " 4.2 Procedure for Handling / Resolving Community Complaints 	Complied
		4.2.5 "This form identifies the person or organization that submitted the complaint, along with the basis of the complaint and the	

		background of the acknowledgment (detailed description of the incident, name of the Party involved, the specific time when the event was the reason for the complaint and the basis of the complaint). 4.2.12 " The company will endeavour to resolve complaints within 15 working days". Based on interview with several of worker, union labor and the stakeholder/local community of Lubuk Bungo Kembang, that the procedure has been understood, as for the workers and society who cannot read (Illiterates) has been described verbally and in general already know and understand related to the complaint procedure.	
4.2.3	The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.	Based on interview with relevant stakeholders during surveillance audit, there is no grievance or conflict raised against unit of certification both company and smallholders.	Complied
4.2.4	The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.	Based on interview with relevant stakeholders during surveillance audit, there is no grievance or conflict raised against unit of certification both company and smallholders.	Complied
Criteria	4.3: The unit of certification contributes to local sustainable developmen	t 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.	The preparation of the CSR program, through the public relations staff of PT Iis-Ukui Group, has consulted with the villages surrounding the plantation through Musrembang Desa (Musyawarah Pengembangan Desa) which is carried out every year. Consultations with surrounding village communities were carried out in January 2022 to establish CSR programs for the 2022 period. In 2021-2022 period, the company has established CSR program is recorded on CSR Project Tracking 2021-2022, consisting 6 types of activities, such as Social, Economy, Education, Health, Infrastructure and Environment.	Complied



The creation of the CSR program is done by coordinating with the local village head through the SIA report and monitoring. (see 3.4)

CSR program Group Ukui in 2022, including:

- 1. Social Aspects:
 - Provide assistance donations to GAPKI
 - Provide assistance equipment of traditional dance class to Ukui 2 village.
- 2. Economy Aspects:
 - Give alternative economic training to the Ukui 2 village, Lubuk Batu Tinggal Village and Bagan Limau Village.
- 3. Education Aspects:
 - Providing Assistance for school supplies in Elementary School-Sokolah Dasar Negeri 002 Ukui 2.
- 4. Health Care Aspects:
 - Providing free health services to Silikuan Hulu Village
 - Providing nutritious food assistance for children (toddlers: under five years old) at Posyandu activities
 - Providing nutritious food assistance for children (toddlers: under five years old) at Posyandu activities
 - Providing training to Posyandu cadres in Bagan Limau Village
- 5. Infrastructure Aspects:
 - Providing assistance in installing drilled wells to mosques in Ukui 2 village
 - Repairing the axis road to Air Hitam Village, Bagan Limau Village, Silikuan Hulu Village, Kampung Baru Village and Lubuk Kembang Sari Village
 - Providing material assistance for renovation to the HKBP Church in Silikuan Hulu Village.

Realization of CSR Year 2021-2022 period, for example:

Criteria 4	•4: Use of the land for oil palm does not diminish the legal, customary o	 On 15 June 2021, CSR Assistance was handed over to the Ukui District Student and Student Association (HIPMI: Himpunan Pelajar dan Mahasiswa Kecamatan Ukui) in the form of: 1 unit of computer, 1 unit of office desk, 1 unit of chair table, 1 unit of file rack, 2 units of fans and 1 unit of megaphone. On August 9, 2021, Providing Assistance in the use of grader and compactor heavy equipment to Bagan Limau Village On December 1, 2021, the provision of assistance in the form of 80 bags of cement to Redang Seko Village for the renovation of the village office. On December 21, 2021, the provision of assistance for free medical examination/checkup and providing milk feeding for three-years –old babies in Silikuan Hulu village. On April 26, 2021, providing assistance to elementary schools in Ukui 2 Village, e.g. school supplies packages in the form of clothes, pants/skirts, school shoes, bags, ties, hats and stationery. On December 28, 2021; provision of assistance medical tools and nutrition for health care and also nutrition for infants under five years old On 18 November 2021, providing assistance of paint for the football field in Tri Mulya Jaya Village. On 18 November 2021, providing assistance of heavy equipment (grader) for road maintenance as 31 HM. On 9 July 2021, provision of assistance for chicken farming business in Ukui village 2. On 5 July 2021, Providing financial assistance for duck farming in Bagan Limau Village. 	
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	Estate: Unit of certification within this scope are UKUI-II Mill supplied by Soga Estate, Sei Lala Estate and 6 Smallholders Cooperatives. Legal	Complied



history of land tenure and the actual legal or customary use of the land are available.

requirements of land use rights in Indonesia is recognize as "Hak Guna Usaha" or Land Title. Where the Land Title issued by National Land Department. The legal land use-rights for this scope as follow:

_		
Estates	Area (Ha)*	Land Title
		HGU Certificate No. 013, 6 Jul 2009. Exp: 9
Soga	2,988	Jun 2044. Total area: 2,704.22 Ha.
Joga	2,900	SK. Ka. BPN RI No: 78-HGU-BPN RI-2008,
		dated 19 Dec 2008.
		HGU Certificate No. 016, 3 Nov 2010. Exp: 3
		Nov 2045. Total area: 299.51 Ha. (remain
Sei Lala	3,176	area is from HGU certificate No. 01 Year 1989
JCI Laid		with area 6,727.40 Ha)
		SK Ka. BPN No: 156/HGU/BPN/2004, dated
		11 November 2004.
Smallholders	Area (Ha)*	Land Title
KUD Tani Subur	780	SHM (Certificate of Land Ownership)
KUD Karya Tani	734	SHM (Certificate of Land Ownership)
KUD Mekar Abadi	574	SHM (Certificate of Land Ownership)
KUD Trani Maju	962	SHM (Certificate of Land Ownership)
KUD Tani Bahagia	1,366	SHM (Certificate of Land Ownership)
KUD Usaha Tani	1,292	SHM (Certificate of Land Ownership)
TOTAL	11,874	

This information has been explained within Criteria 2.1 above.

PT. Inti Indosawit Subur – Ukui II POM 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). Scheme Smallholders: Based on interview, KUD Tani Subur, Karya tani dan KUD Mekar Ababdi,	
		sampled smallholder member (farmer) and relevant authority, Plantation Agency of Indra Giri Hulu Regency; there was no case of land conflict between smallholder member and/or conflict with other party related to land status or boundary.	
		Cooperatives have a conflicts resolution mechanism in "Mekanisme Penanganan Konflik" dated 1 st August 2014. The mechanism explaining flow process to resolution on land conflict, with involvement of company, village government and all related agencies.	
4.4.2	Copies documents evidencing agreement- making processes and negotiated agreements detailing the FPIC process are available and include: 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.	PT. Inti Indosawit Subur is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. The land status is clear, and no land disputes raised. Copies of documents evidencing agreement-making processes and negotiated agreement detailing the FPIC process are obsolete.	Complied
	4.4.2b Evidence that the unit of certification has respected communities to give or withhold their consent to the operations at the time that these decisions were taken;	PT. Inti Indosawit Subur is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. The land status is clear, and no land disputes raised. Copies of documents evidencing agreement-making processes and negotiated agreement detailing the FPIC process are obsolete.	

	4.4.2c Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities. Including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land.	PT. Inti Indosawit Subur is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. The land status is clear, and no land disputes raised. Copies of documents evidencing agreement-making processes and negotiated agreement detailing the FPIC process are obsolete.	
4.4.3	(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).	Estate: Maps of an appropriate scale (1:50.000) showing the extent of recognised legal, customary or user rights are available within HGU map namely "Peta Gambar Situasi Khusus". This map is attached within HGU certificate. Ukui Smallholders: Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are available within Certificate of Land Ownership or "Sertipikat Hak Milik" in each smallholder.	Complied
4.4.4	All relevant information is available in appropriate forms and languages, including assessment of impact, proposed benefit sharing, and legal arrangements.	PT Inti Indosawit Subur – Ukui Group is not acquired any new land for oil palm plantation. The company does not restrict local people's access through the main Estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on area statement documents of Estate (Sei Lala Estate & Soga Estate), interview with communities (village representatives of Bagan Limau and Ukui village) and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.	Complied
		Plasma UKUI (Smallholder Scheme):	

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		During field observation and interview with sample of smallholders at KUD Tani Subur, KUD Karya tani and KUD Mekar Abadi obtained information that there is no land dispute within smallholder's area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights.	
4.4.5	(C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.	PT Inti Indosawit Subur – Ukui Group is not acquired any new land for oil palm plantation. The company does not restrict local people's access through the main Estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on area statement documents of Estate (Soga Estate and Sei Lala Estate), interview with communities (village representatives of Bagan Limau and Lubuk Kembang Bungo village) and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.	Complied
		Plasma UKUI (Smallholder Scheme):	
		During field observation and interview with sample of smallholders at KUD Tani Subur, KUD Karya tani and KUD Mekar Abadi obtained information that there is no land dispute within smallholder's area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights.	
4.4.6	There is evidence that implementation of agreement negotiated through FPIC is annually reviewed in consultation with affected parties.	PT Inti Indosawit Subur – Ukui Group is not acquired any new land for oil palm plantation. The company does not restrict local people's access through the main Estate roads. This was confirmed during interview with company representative and stakeholder consultation with local	Complied

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		community. Based on area statement documents of Estate (Soga Estate and Sei Lala Estate), interview with communities (village representatives of Bagan Limau and Lubuk Kembang Bungo village) and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.	
		Plasma UKUI (Smallholder Scheme):	
		During field observation and interview with sample of smallholders at KUD Tani Subur, KUD Karya tani and KUD Mekar Abadi obtained information that there is no land dispute within smallholder's area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights.	
	4.5: No new plantings are established on local peoples' land where it can through a documented system that enables these and other stakeholde	be demonstrated that there are legal, customary or user rights, without the rs to express their views through their own representative institutions.	eir FPIC. This is
4.5.1	(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.	Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State	Complied
		Land and no land compensation was made. Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main Estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Estate (Soga Estate and Sei Lala Estate) area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.	

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



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

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

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

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

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

	established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.	Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State	
		Land and no land compensation was made. Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main Estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Estate (Soga Estate and Sei Lala Estate) area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.	
		Plasma UKUI (Smallholder Scheme):	
		During field observation and interview with sample of smallholders at KUD Tani Subur, KUD Karya Tani and KUD Mekar Abadi, there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights.	
4.6.3	Evidence is available that equal opportunities are provided to both men	Estate:	Complied
	and women to hold land titles for smallholdings (if possible based on local law, customs and/or agreement).	Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State	·
		Land and no land compensation was made. Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main Estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Estate (Soga Estate and Sei Lala Estate) area	

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

		in early 1980's, therefore all smallholders plots already have legal use rights.	
	4.7: Where it can be demonstrated that local peoples have legal, customa subject to their FPIC and negotiated agreements.	ry or user rights, they are compensated for any agreed land acquisitions and	relinquishment
4.7.1	compensation is in place.	Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation was made. Also, there is not acquired any new land for oil palm plantation. The company does not restrict local	Complied
		peoples access through the main Estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.	
		Plasma UKUI (Smallholder Scheme): During field observation and interview with sample of smallholders at KUD Tani Subur, KUD Karya Tani and KUD Mekar Abadi, there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights.	
4.7.2	(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.	PT. Inti Indosawit Subur – Ukui Group 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.	Complied

		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).	
		Scheme Smallholders:	
		Based on interview, KUD Bakti, KUD Bukit Potalo and KUD Sumber Makmur, 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.	
		Cooperatives have a conflicts resolution mechanism in " <i>Mekanisme Penanganan Konflik</i> " dated 1st August 2014. The mechanism explaining flow process to resolution on land conflict, with involvement of company, village government and all related agencies.	
		There is no new planting within certified area of PT Inti Indosawit Subur – Estate and Ukui 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.	
4.7.3	Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.	Mill & Estate: Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State	Complied
		Land and no land compensation was made. Also, there is not acquired any new land for oil palm plantation. The company does not restrict local	



		peoples access through the main Estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Soga Estate and Sei Lala Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities. Scheme Smallholders:		
		Based on interview, KUD Tani Subur, KUD Karya tani and KUD Mekar Abadi, 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.		
		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.		
		There is no new planting within certified area of PT Inti Indosawit Subur – Sei Lala and Soga Estate and Ukui 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.		
Criteria rights.	Criteria 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrated that they have legal customary, or user rights.			
4.8.1	Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that	Estate and Scheme Smallholders:	Complied	



	any compensation was accepted following a documented process of FPIC.	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. 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.	
		Based on interview with the Farmer Group/KT No. 127, plot No. 4267, 4417, 4258 and 4445 and Farmer Group No. 60, plot No. 1303, no. 1304, 1317, 1318, that the boundary markers between smallholder block, as well as boundary markers with neighboring farmer group has been established. There was no land dispute noted.	
4.8.2	(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.	Estate: Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation with through FPIC mechanism was made. Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main Estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Estate (Soga Estate and Sei Lala Estate) area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities. Plasma UKUI (Smallholder Scheme):	Complied
		During field observation and interview with sample of smallholders at KUD tani Subur, KUD Karya Tani and KUD Mekar Abadi, there is no land dispute within smallholders area since the plantation developed.	

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

		origin from State Land and no land compensation with through FPIC mechanism was made.	
		Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main Estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Estate (Soga Estate and Sei Lala Estate) area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.	
		Plasma UKUI (Smallholder Scheme):	
		During field observation and interview with sample of smallholders at KUD tani Subur, KUD Karya Tani and KUD Mekar Abadi, there is no land dispute within smallholders area since the plantation developed.	
		Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights.	
Principl	le 5: Support smallholder inclusion		
Include s	smallholders in RSPO supply chains and improve their livelihoods through	fair and transparent partnerships.	
Criteria	5.1: The unit of certification deals fairly and transparently with all smallh	nolders (Independent and Scheme) and other local businesses.	
5.1.1	Current and previous period prices for FFB are publicly available and accessible by smallholders.	Based on interview with management representative i.e., public affair staff, sustainability and plasma manager obtained information that the actual prices informed directly to the board of plasma or other FFB supplier. The actual prices also informed by social media messenger such as WhatsApp or by phone call.	Complied
		During the audit, Kebun Plasma Ukui has showed the FFB payment receipt period February 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 Tani Subur, KUD Karya Tani and Mekar Abadi period April 2022. All payments have been complied with the pricing that stipulated by FFB Pricing Team of Riau Province.	
5.1.2	(C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.	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). The FFB payments conducted monthly. For example, there was a receipt of FFB payments period of April 2022 on behalf of KUD Tani Subur, KUD Karya Tani and KUD Mekar Abadi.	Complied
5.1.3	(C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.	Management of PT Inti Indosawit Subur – Ukui 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.	Complied
		During this audit obtained information that the premium sharing for Ukui Plasma period 2021 has been handover in October 2021. Ukui Plasma using that fund for:	
		Installation of boundary poles	
		Providing PPE for harvester	
		Alternative income (cattle)	
		Purchasing the stationery and office equipment.	
		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 re-payments through FFB price reductions for replanting and/or, other support mechanisms where applicable.	The smallholder's member of Ukui Plasma originated from government transmigration program on 1989 – 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.	Contracts are fair, legal and transparent and have an agreed timeframe, as seen in indicator 2.2.2.	Complied
		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.	
		During this audit, management units has had several contracts related to third parties as follows:	
		Mill:	
		CV Jaya Pertama (CPO/PK/CPKO Transporter)	
		2. PT Buana Jaya Bersama (CPO/PK/CPKO Transporter)	
		3. CV Jasa Sahabat Abadi (CPO/PK/CPKO Transporter)	
		4. CV Sumber Kencana (CPO/PK/CPKO Transporter)	
		Soga Estate:	
		PT Teknik Jaya Abadi (Road Maintenance)	
		Sei Lala Estate	
		1. Kuntaryadi (school bus)	
		2. PT Karunia Mandiri Sejahtera Abadi (Replanting)	
		3. CV Cipta Jasa Abadi (Replanting)	

(C) Agreed payments are made in a timely manner and receipts specifying price, weigh, deductions and amount paid are given.	Payments are made in timely manner and receipts specifying price, weight, deductions and amount paid are available. Sighted the evidence of smallholder's FFB payments period April 2022.	Complied
	The receipt signed by plasma assistant, head of KUD, head clerk, plasma clerk and head of smallholder group. Based on interview with board of KUD's obtain information that the payments have been made in a timely manner and receipts specifying price, weigh, deduction and paid given.	
Weighing equipment is verified by an independent third party on a regular basis.	Weighbridge in Ukui II POM is verified by government agency in annual basis. Latest verification was performed on 18 May 2022 by UPTD METROLOGI LEGAL Dinas Perindustrian dan Perdagangan Kabupaten Pelalawan, valid until May 2023. Weighbridges calibration certificate were sighted during audit.	Complied
	According to the last certificate it was noted that verification result was comply to requirement, endorsed based on UU RI No. 2 Year 1981 concerning Metrology Legal.	
The unit of certification supports Independent smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholder on who runs the Internal Controlling System (ICS), who holds the certificate, and who owns and sells certified materials.	Based on review of agreement, the company carried out the development and provide supervision in KUD (scheme smallholder). The company support KUD in form of supervision in upkeep, fertilizer application, harvesting, FFB transport and implementation of RSPO P&C requirements.	Complied
Guidance for 5.1.8:		
	own/sell certified materials but also should include the party managing benefits of	the certification,
(C) The unit of certification has a grievance mechanism for smallholders, and all grievances raised are dealt with in a timely manner.	The company has established mechanism for handling grievance from external party as in " <i>Mekanisme Penanganan Keluhan Stakeholder</i> " dated 22 Apr 2019. Smallholders are including as external in the mechanism.	Complied
r	Weighing equipment is verified by an independent third party on a regular basis. The unit of certification supports Independent smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholder on who runs the Internal Controlling System (ICS), who holds the certificate, and who owns and sells certified materials. Inidance for 5.1.8: Inent is not only limited to the management of ICS, certificate holder, and who ettings of account that will be used to manage funds from credit sales. (C) The unit of certification has a grievance mechanism for smallholders, and all grievances raised are dealt with in a timely	weight, deductions and amount paid are given. weight, deductions and amount paid are available. Sighted the evidence of smallholder's FFB payments period April 2022. The receipt signed by plasma assistant, head of KUD, head clerk, plasma clerk and head of smallholder group. Based on interview with board of KUD's obtain information that the payments have been made in a timely manner and receipts specifying price, weigh, deduction and paid given. Weighing equipment is verified by an independent third party on a regular basis. Weighbridge in Ukui II POM is verified by government agency in annual basis. Latest verification was performed on 18 May 2022 by UPTD METROLOGI LEGAL Dinas Perindustrian dan Perdagangan Kabupatern Pelalawan, valid until May 2023. Weighbridges calibration certificate were sighted during audit. According to the last certificate it was noted that verification result was comply to requirement, endorsed based on UU RI No. 2 Year 1981 concerning Metrology Legal. Based on review of agreement, the company carried out the development and provide supervision in KUD (scheme smallholder). The company support KUD in form of supervision in upkeep, fertilizer application, harvesting, FFB transport and implementation of RSPO P&C requirements. weight, deductions and FWD. Based on KUD's obtain information that the payments have been made in a timely manner and receipts specifying price, weigh, deduction and paid given. Weighbridge in Ukui II POM is verified by government agency in annual basis. Latest verification was performed on 18 May 2022 by UPTD METROLOGI LEGAL Dinas Perindustrian dan Perdagangan Kabupatern Pelalawan, valid until May 2023. Weighbridges calibration certificate were sighted during audit. According to the last certificate it was noted that verification result was comply to requirement, endorsed based on UU RI No. 2 Year 1981 concerning Metrology Legal. Based on review of agreement, the company carried out the development and provide supervision in KUD (scheme smallholder). The com

		The company has also provided channel to report if there is violation to the principles and objectives, through email whistleblow@rgei.com or phone (62) 81 2755 2528. During this surveillance audit (on period 2020-2022), auditor has interview with the smallholder and local communities, that there is no complaint or grievance from smallholder, stakeholder and also with local communities surrounding the plantation.	
5.2.1	5.2: The unit of certification supports improved livelihoods of smallholde The unit of certification consults with interested smallholders	PT IIS-Ukui Group always communicates with interested smallholders	Complied
	(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.	including women farmers to support their livelihoods especially those related to RSPO certification. Some of the company's activities that can be considered as supporting activities towards interested smallholders, among them:	
		OHS (Basic Safety), conducted on 9 October 2021, attended by 30 farmers.	
		First Aid Training, conducted on 28 August 2021, attended by 124 farmers.	
		 Refresh of Best Management Practises on 12 February 2022, attended by 144 farmers. 	
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).	PT IIS-Ukui Group always communicates with interested smallholders including women farmers to support their livelihoods especially those related to RSPO certification. Some of the company's activities that can be considered as supporting activities towards interested smallholders, among them:	Complied
		OHS (Basic Safety), conducted on 9 October 2021, attended by 30 farmers.	
		First Aid Training, conducted on 28 August 2021, attended by 124 farmers.	

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		 Refresh of Best Management Practises on 12 February 2022, attended by 144 farmers. 	
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	Ukui II Mill supplied by own estates (Soga and Sei Lala Estate) and smallholder from 6 KUD's with total 2,854 smallholders. Based on interview with smallholder representatives from KUD Tani Subur, KUD Karya Tani and KUD Mekar Abadi obtain information that entire land has been granted by government (private land title/SHM). Asian Agri's through his subsidiary PT. Inti Indosawit Subur fully supported their smallholder to be certified by ensuring all FFB come from legal sources and comply with national regulation. They also conducted good engagement to demonstrated best management practices in agronomy, environmental handling and safety procedures. For example, each plot received 4 unit barn owl box to help them control rat population. During the audit, auditor also obtain information that PT. Inti Indosawit Subur are now assisting the smallholders on replanting project in	Complied
		collaborated with local government. This aims to ensure that farmers produce palm oil sustainably.	
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	Certificate Holder has assigned chemical weeding team (<i>Tim Unit Semprot/TUS</i>) in each estate/unit to handling chemical weeding activity. The team member originated from own workers (for own estate) and local communities (for smallholder). They regularly attended training on pesticide handling that conducted by the pesticide supplier in collaboration with local pesticide committee.	Complied
		Based on document review and interview with random pesticide applicator known that they were attending the last training on pesticide handling on 24 May 2019. Some topic that discuss such as safety pesticide handling, national regulation related to pesticide, symbol and label awareness and emergency procedure if any contamination or poisonous.	
		During the audit, auditor also interviewed some smallholder representatives and obtain information that the company has provide	

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		training session for them on how to be handling pesticide safely. For example, pesticide applicator shall use appropriate PPE during application, no smoke, avoid the direction of wind blows and cleaned their body after application to reduce contamination.	
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	Annual review of progress of the smallholder support by Asian Agri's can be see and downloaded in Asian Agri's website https://www.asianagri.com/id/panel-keberlanjutan/laporan-keberlanjutan. That document is publicly available. Plasma manager (KLU) also described that PT Inti Indosawit Subur also helped the smallholder based on monthly management review of smallholder performance as follows: • Assisted the KUD's to achieve the production and upkeep target. Until this audit, plasma area has been achieved 5% above the target. • Assisting the KUD's in replanting program. Until this audit, there is a record of approval by smallholder member in some KUD's. PT Inti Indosawit Subur as agreed to be bank guarantor for the financial scheme of replanting. Based on field visit and interview with smallholder representatives, each KUD's has been supported in IPM program. They equipped with beneficial plant and barn owl box (4 unit each plot). Certificate holder also conducted training in order to ensure the smallholder's competency. For example: • OHS (Basic Safety), conducted on 9 October 2021, attended by 30 farmers. • First Aid Training, conducted on 28 August 2021, attended by 124 farmers. • Refresh of Best Management Practises on 12 February 2022, attended by 144 farmers.	Complied



Principle 6: respect workers' rights and conditions

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

Criteria 6.1: Any form of discrimination is prohibited.

(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.

PT Inti Indosawit Subur – Ukui Group has established the Company Policy on Equal Opportunities as documented in "Kebijakan Perusahaan", dated 1st December 2019: "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"- 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 Soga Estate and Sei Lala Estate.

Promotion and upgrade are based on employee appraisal conducted annually as outlined in the Employee Assessment Form signed by the employee concerned, approved by the line manager and checked by the General Manager. The form indicates that there is no indication of employment discrimination in terms of ethnicity, caste, religion, disability, gender, sexual orientation, union membership, political affiliation and/or age.

Based on interviews with management and document verification, that there is no discrimination against employees in the recruitment process and also the promotion of positions or the appointment of employees as permanent employees.

Scheme smallholders:

Complied

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		Group Manager has established the ICS Policy under "Kebijakan Group Manager" dated 3 rd January 2020, that was signed by Manajer Group ICS Ukui Group, in point 9 was mentoned "Menghormati HAM, serta keterwakilan tanpa memandang suku, kasta, asal negara, agama/kepercayaan, cacat, jender, orientasi seksual, keanggotaan serikat pekerja, afiliasi politik dan atau umur"— 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 smallholder member. Based on field visit and interview with sample of smallholder member in KUD Mekar Abadi, KUD Tani Subur and KUD Karya Tani, they have understand of the ICS Policy.	
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.	Based on interview during onsite audit year 2022, workers were aware if there any cases of discrimination, e.g. document review of salary payment month March — April 2022, there was not find any evidence of discrimination.	Complied
		The workers and groups including local communities, women, and migrant workers have not been discriminated against, confirmed during the interview	
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.	PT Inti Indosawit Subur – Ukui Group has demonstrated the commitment that the recruitment selection, hiring access to training and promotion are based on skills, capabilities, qualities and medical fitness, such as:	Complied
		 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. 	

		Docruitment colection biring and promotion has based on skills	
		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 organization as described in criterion 2.1. Annuals performance evaluation result of worker has shown. 	
		 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 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. 	
		Promotion and upgrade are based on employee appraisal conducted annually as outlined in the Employee Assessment Form signed by the employee concerned, approved by the line manager and checked by the General Manager. The form indicates that there is no indication of employment discrimination in terms of ethnicity, caste, religion, disability, gender, sexual orientation, union membership, political affiliation and/or age.	
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.	PT Inti Indosawit Subur – Ukui Group prohibits pregnant or breast-feeding women to perform chemical spraying. In order to mitigate, estate performed monthly pregnancy test.	Complied
		PT Inti Indosawit Subur – Ukui Group 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.	

		Based on pregnancy test results period January – April 2022, all the female sprayer in well condition and not being pregnant nor breast feeding.	
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.	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.	Complied
		PT Inti Indosawit Subur – Ukui Group 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.	
		Implemented policy on prevention of sexual harassment and violence against women, the policy is prominently displayed on notice boards at Ukui II POM, Sei Lala Estate and Soga Estate.	
		Based on interviews of female staff, workers and union representatives confirmed that the company implemented the sexual harassment policy.	
		The program of Gender Committee of PT Inti Indosawit Subur - Ukui Group year 2021-2022, these included:	
		a. Special activities:	
		women-do clean Friday – pembersihan pada hari Jumat	
		Posyandu activities (integrated services post for toddlers)	
		Healthy activities for employees mothers	
		Socialization related to sexual harassment and violence against the women	
		b. Communication with the management related company employees complaints (especially female employees):	
		Routine meetings at least 1 times a year	
		Socialization	

		Scheme Smallholders:	
		Plasma Ukui Group has demonstrated the policy to prevent sexual harassment and violence against women in "Kebijakan ICS Group Manager" issued dated 3 rd January 2020, in chapter 11 was stated "Mencegah pelecehan sexual dan berbagai bentuk kekerasan terhadap perempuan serta melindungi hak-hak reproduksinya (prevent sexual harassment and violence as well as protect reproductive rights for women)". The policy has communicated to all scheme smallholders member and displayed in publication board in each (KUD Usaha Tani, KUD Karya Tani, KUD Tani Bahagia).	
		Based on interview with management, there is no issues raised related gender, discrimination and/or harassment since year 2020.	
6.1.6	There is evidence of equal pay for the same work scope.	Company has had state about the wages for workers base on Decree of Keputusan Gubernur Riau No. Kpts. 1272/XI/2021", dated 30/11/2021 for Upah Minimum Kabupaten/Kota in Province of Riau on 2022 is IDR 3,030,598.54/month. The company composes the structure and scale of the 2022 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.	Complied
		The Company has already set wage standard based on wages set by the government recorded on Memorandum no. 049/HR-R02/MEMO/IV/2022, dated 30 April 2022; regarding: "Kenaikan Upah Pekerja Golongan SKUB" on period 2022 and also the determination of the daily wage for BHL (Daily workers) and PKWT employees (temporary workers). On this memorandum is also determine regarding structure of wage for each level worker (SKU-H and AKU-B). The company is also gives a scripts/slip salary to employees before salary is given, salary slip also contains basic salary, allowances, premium, labor health coverage (BPJS Ketenagakerjaan and Kesehatan) and deduction as well.	

	6.2: Pay and conditions for staff and workers and for contract workers alviges (DLW).	During this surveillance audit, the wages used are still using the wages for the 2021 period, which is (IDR 120,800 per day), while for the application of wages for the 2022 period based on the governor's decision no. Kpts. 1272/XI/2021", dated 30/11/2021 will be issued as of January and the payment will be made in May 2022 (Rapel). Taken sample of salary slip for period April 2022. 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.	provide decent
6.2.1	(C) Documentation of pay and working conditions in accordance with applicable labour laws are available to the workers in national languages and explained to them in language they understand.	The Company already has Collective Work Agreement (PKB) period 2018-2020 which has been approved by the Director General of Industrial Relations and Social Security of Workers through Decision Letter no. B.319/PHIJSK/X/2018 dated 26 October 2018 concerning Registration of "PKB Badan Kerjasama Perusahaan Perkebunan Sumatera (BKS-PPS)" with Central Board of Federasi Serikat Pekerja Pertanian dan Perkebunan - SPSI. PKB is binding for all SKU-H and SKU-B levels. The PKB is valid for 2 years and build in Indonesian language.	Complied
		The PKB document regulates provisions regarding working time, wage system, assistance for sick days, absenteeism, tour of external services, overtime work, and payment of allowances while in the hold of state equipment. PKB is also provisions regarding premiums, payment of holiday allowances and bonuses, guarantees Social and Social Assistance, Work Equipment and Occupational Safety, Acceptance, Transfer of Promotions and Layoffs, Provisions for motorized vehicles for workers and educators, Company and Worker Obligations, Manpower Settlement Methods and the Termination of Company Regulations.	
		Article V (Wages) regulates: • Wages	



- Rice / Natura Supply Allowances
- Provisions concerning who is entitled to receive a rice supply, and
- Dependents of workers.

The company determines minimum wages based on the Government regulation annually, the minimum wages in 2022 as regulated in Decree of Gubernur Riau No. Kpts. 1272/XI/2021", dated 30/11/2021 for Upah Minimum Kabupaten/Kota in Province of Riau is IDR 3,030,598.54/month. Based on review of payments slip, there is no worker paid below minimum wages.

The company determines minimum wages based on the Government regulation annually, the minimum wages in 2022 as regulated in Decree of Gubernur Riau No. Kpts. 1272/XI/2021", dated 30/11/2021. Based on review of payments slip, there is no worker paid below minimum wages. The samples have been verified on behalf of Bambang Irawan (harvester-Soga Estate) and Pauji Panjaitan (harvester-Sei Lala Estate).

Ukui Smallholder:

Waging in ukui scheme smallholder carried out in accordance with the employment regulations that apply i.e. based on Decree of Gubernur Riau No. Kpts. 1272/XI/2021", dated 30/11/2021 for Upah Minimum Kabupaten/Kota in Province of Riau on 2022 is IDR 3,030,598.54/month or IDR 121,224 per day.

Farmer members of Kebun Plasma Ukui were not directly conducted the spraying work and handle the pesticide/herbicide. Spraying works and pesticide handling was performed by PT Inti Indosawit Subur, hence the chemical was stored by PT Inti Indosawit Subur in Agrochemical storage. Noted that, no outbreak of pest at all the sample farmers' area. Spraying works performed by TUS team which provided by PT Inti Indosawit Subur according to:



- Letter of Cooperation Agreement for Procurement of TUS Plasma Ukui
 Surat Perjanjian Kerjasama Pengadaan TUS Plasma Ukui No.
 02/SPK/SPK-TUS/KLU-KB/I/2022 dated 6 January 2022 between KUD Karya Bersama and PT Inti Indosawit Subur valid until 31 December 2022.
- Letter of Cooperation Agreement for Procurement of TUS Plasma Ukui
 Surat Perjanjian Kerjasama Pengadaan TUS Plasma Ukui No. 02/SPK/SPK-TUS/KLU-BS/I/2022 dated 6 January 2022 between KUD Bina Sejahtera and PT Inti Indosawit Subur valid until 31 December 2022.
- Letter of Cooperation Agreement for Harvester Plasma Ukui Surat Perjanjian Kerjasama Kerja Panen No. 08/SS/KB/SK.Panen/I/2021 dated 4 January 2022 between KUD Tani Subur and PT Inti Indosawit Subur valid until 31 December 2022.
- Letter of Cooperation Agreement for Harvester Plasma Ukui Surat Perjanjian Kerjasama Kerja Panen No. 013/Doc. Mekar Abadi/SK/XII/2021 dated 14 Desember 2021 between KUD Mekar Abadiand PT Inti Indosawit Subur valid until 31 December 2022.

Taken sample documents of wage:

- Receipt of harvesters' wages; on behalf of the Samsidi as harvester on KT 04 / plot no. 116 KUD Karya Bersama; on period April 2022 FFB harvest of 4,300 kg, with a wage of IDR 200 per kg, earners of IRD 860,000.
- Receipt of harvesters' wages; on behalf of the Hendri Yanto as harvester on KT 300 / plot no. Lahap at KUD Bukit Patalo; on period April 2022 FFB harvest of 3,250 kg, with a wage of IDR 200 per Kg, earners of IRD 455,000.

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	1	T T	
		Based on sample of payment documents above, that the company determines minimum wages based on the Government regulation annually, the minimum wages in 2022 as regulated in Decree of Governor Riau No. Kpts. 1272/XI/2021", dated 30/11/2021. Based on review of payments slip, there is no worker paid below minimum wages.	
6.2.2	(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed.	The PKB document regulates provisions regarding working time, wage system, assistance for sick days, absenteeism, tour of external services, overtime work, and payment of allowances while in the hold of state equipment. PKB is also provisions regarding premiums, payment of holiday allowances and bonuses, guarantees Social and Social Assistance, Work Equipment and Occupational Safety, Acceptance, Transfer of Promotions and Layoffs, Provisions for motorized vehicles for workers and educators, Company and Worker Obligations, Manpower Settlement Methods and the Termination of Company Regulations. Based on verification of documents and interviews with workers stated that each worker has a Work Agreement with companies made in Indonesian as a language understood by all ethnic groups in PT IIS -UKUI Group. The Work Agreement Letter regulates Position, validity period and expiration of employment agreement, Obligations of workers, Placement/Transfer/Transfer, Payroll, Treatment, Annual leave, Worker Guarantee, Termination of employment, termination of employment and others. During this audit is still use payment on period 2021 based on the decree of the Governor of Riau No. Kpts. 1198/XI/2019 dated November 21, 2019 regarding the Minimum Wage regency/city in Riau Province in 2020 amounted to IDR per month. The company will make rapel wage payments using the 2022 period wages in May 2022.	Complied
		The employment contract has explained the related period of agreement, wages and payment per day in accordance with the Governor's Decree on	

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Wages in 2022), allowances (holidays and others), attachments related to disgraceful acts/actions; which explains related to discrimination, child labor, workers' code of ethics, sexual harassment and coercion or force labor, for example:

- Joint Work Agreement (PKB) on period 2018-2020, is a work agreement between PT IIS with members of the Cooperation Agency (BKS-PPS Sumatra plantation companies) in Aceh province, North Sumatra province of Riau and Jambi. PME is based in the Law No. 13 in 2003.
- Employment Contract Perjanjian Kerja Perjanjian Harian Lepas no. 001/PKH/KSL/XI/2022, dated 1 November 2021 on behalf of Eni Maria for position Plantation upkeep, valid until 30 November 2022.
- Employment Contract Perjanjian Kerja Perjanjian Harian Lepas no. 001/PKH/KSL/II/2022, dated 1 February 2022 on behalf of Nurlaila for position Plantation upkeep, valid until 30 February 2023.
- Employment Contract Perjanjian Kerja Perjanjian Harian Lepas no. 144/PKHL/KSA/II/2022, dated 15 February 2022 on behalf of M. Sumarno for position Plantation upkeep, valid until 30 February 2023.

Based on sample of workers contract above, that PT IIS Ukui II has implemented contract documents in accordance with applicable regulations. i.e. UU. No. 11 Year 2021: UU Cipta Kerja.

Scheme Smallholder:

Farmer members of Kebun Plasma Ukui were not directly conducted the spraying work and handle the pesticide/herbicide. Spraying works and pesticide handling was performed by PT Inti Indosawit Subur, hence the chemical was stored by PT Inti Indosawit Subur in Agrochemical storage. Noted that, no outbreak of pest at all the sample farmers' area. Spraying

_			
		works performed by TUS team which provided by PT Inti Indosawit Suburaccording to:	
		 Letter of Cooperation Agreement for Procurement of TUS Plasma Ukui Surat Perjanjian Kerjasama Pengadaan TUS Plasma Ukui No. 02/SPK/SPK-TUS/KLU-KB/I/2022 dated 6 January 2022 between KUD Karya Bersama and PT Inti Indosawit Subur valid until 31 December 2022. 	
		 Letter of Cooperation Agreement for Procurement of TUS Plasma Ukui Surat Perjanjian Kerjasama Pengadaan TUS Plasma Ukui No. 02/SPK/SPK-TUS/KLU-BS/I/2022 dated 6 January 2022 between KUD Bina Sejahtera and PT Inti Indosawit Subur valid until 31 December 2022. 	
		- Letter of Cooperation Agreement for Harvester Plasma Ukui - Surat Perjanjian Kerjasama Kerja Panen No. 10/SS/KB/SK.Panen/I/2021 dated 4 January 2022 between KUD Bina Sejahtera and PT Inti Indosawit Subur valid until 31 December 2022.	
		Based on sample of contract document above, that Ukui II Scheme Smallholder has implemented and in accordance with the related regulations.	
6.2.3	(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.	The PKB document regulates provisions regarding working time, wage system, assistance for sick days, absenteeism, tour of external services, overtime work, and payment of allowances while in the hold of state equipment. PKB is also provisions regarding premiums, payment of holiday allowances and bonuses, guarantees Social and Social Assistance, Work Equipment and Occupational Safety, Acceptance, Transfer of Promotions and Layoffs, Provisions for motorized vehicles for workers and educators, Company and Worker Obligations, Manpower Settlement Methods and the Termination of Company Regulations.	Complied



		Based on verification of documents and interviews with workers stated that each worker has a Work Agreement with companies made in Indonesian as a language understood by all ethnic groups in PT IIS -UKUI Group. The Work Agreement Letter regulates Position, validity period and expiration of employment agreement, Obligations of workers, Placement/Transfer/Transfer, Payroll, Treatment, Annual leave, Worker Guarantee, Termination of employment, termination of employment and others.	
T w	The employment contract has explained the related period of agreement, wages and payment (IDR. 121,223.92 per day in accordance with the Governor's Decree on Wages in 2020), allowances (holidays and others), attachments related to disgraceful acts/actions; which explains related to discrimination, child labor, workers' code of ethics, sexual harassment and coercion or force labor.		
		Document sample taken: - Overtime Letter Order- Surat Perintah Lembur (SPL) dated 03 April 2022 on behalf of M. Saidin for vehicle maintenance activity at 16.00 – 19.00 (3 hour).	
		- Application for annual leave - Surat Permohonan Cuti on behalf of Tiurma Juliana Limbong (upkeep), annual leave will be carried out on 10 January – 13 January 2022 (4 days).	
		Based on document verification and interviews with several workers, that the application of working hours, overtime pay, leave entitlements and others has complied with applicable regulations and regulations.	
6.2.4	(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	Estate and Mill The company has prepared facilities for the workers, including the basic need such as electricity and water. Detail of company facilities for employees are as follows:	Complied



units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.

- Ukui II Mill Housing, consist of Type B (2 units), type C (5 units), type D (14 units), Type E (86 units),
- Estate (Soga Estate and Sei Lala Estate) Housing, consist of Type B (3 units), Type C 22 units), type D (26 units), type E (454 units)
- Policlinic (1 unit),
- Mosque (1 units),
- Church (1 unit),
- Community hall (1 unit),
- Kindergarten (1 units)
- Elementary School (2 units)
- Sport Centre (1 unit)
- School bus (2 units),

Estate and Mill have provided the clean water supply for all employees. Water quality is being checked and monitored on regular basis.

The company has provided clean water facilities and electricity supplier (from PLN) by giving subsidies. Subsidies financing for electricity of IDR 40,000 per month per house.

Clean water checking has been made by the company through the laboratory checking and cooperation with UPT Laboratorium Bahan Konstruksi Dinas Pekerjaan Umum, Penataan Ruang, Perumahan Kawasan Pemukiman dan Pertanahan Prov. Riau. Last examination was done on the date of 24 January 2022 at Ukui II Mill. The laboratory checking at Sei Lala Estate was done on 25 march 2022.

The checking is refer to PerMenKes No. 492 Tahun 2010 regarding The Quality of Clean Water (drinking water) Requirement.

6.2.5	The unit of certification makes efforts to improve workers' access to	Estate and Mill	Complied
	adequate, sufficient and affordable food.	Company is able to demonstrate effort in providing access to adequate, sufficient and affordable food: provision of rice allowance – aside from monthly salary to all eligible workers, cooperative organization for employee providing basic food necessities (Waserda Koperasi Karya Bersama). Company is also accommodating weekly market for each estate; Sunday for Estate.	·
		Ukui Smallholder:	
		The farmer member villages are a developed Transmigration Village. Provision of food can be obtained from existing markets in the village. Based on the results of field visits to the sample villages indicate that in the village was available weekly markets and stalls that provide basic necessities.	
6.2.6	A DLW is paid to all workers in accordance with applicable regulations, including workers who work on a piece rate/quota basis, the calculation of which is based on a quota that can be achieved during regular working hours.	The company determines minimum wages based on the Governor of Riau No. Kpts. 1272/XI/2021", dated 30/11/2021 for Upah Minimum Kabupaten/Kota in Province of Riau on 2022 is IDR 3,030,598.54/month or IDR 121,224 per day. Based on review of payments slip, there is no worker paid below minimum wages.	Complied
		As for the period of 2022 wage determination has not changed from based on the Decree of the Governor of Riau Year 2022 No. Kpts. 1272/XI/2021", dated 30/11/2021. The amount of basic wage based on the decision letter for Pelalawan Regency amounted to IDR 3,030,598.54 per month.	
		In general, the UKUI Group including smallholders have calculated the Decent Living Needs using the calculation method as set out in the "RSPO Guidance for Implementing a Decent Living Wage", June 1, 2019. The	



company has conducted an account of the DLW for the 2022 period with data drawn from each Estate and POM.

Based on the verification of documents the results of the 2022 DLW calculation shows that total cost and kind benefits for average is IDR 683,715, average monthly take home salary per worker is IDR 3,086,646 and total value of prevailing wage is ISR 3,772,362.

Scheme Smallholder:

Calculation of DLW Cooperative employees period 2020, DLW Calculation of Family Workers (K-3) KUD.

Based on the verification of documents the results of the 2022 DLW calculation shows that the Gross of DLW is IDR 6,196,061.04.

Piece rate/quotas calculation has been calculated based on the achievement of 7 working hours in accordance with applicable regulations (UU No. 11/2021), for example:

Calculation of labor harvest in Plasma:

- Ability to harvest power for 7 hours per day: 3,000 kg
- Harvest area: 4 hectares
- Job performance in 1 hour 429 kg / hour
- Basic wages Based on the provisions of Prov. Riau: IDR. 120,800 per day
- Price of harvest: IDR. 40 / kg
- Price per hectare: IDR. 30,200 per Ha
- Actual Harvest Costs (currently in effect): IDR 200 / Kg
- There is a gap of: 273% positive.

Calculation of fertilizer labor piece rate:



	- The ability to sow fertilizer for 7: 600 kg	
	- Tonnage per hour: 86 Kg / hour	
	- Basic wages Based on the provisions of Prov. Riau: IDR. 120,800 per day	
	- Fertilizer wages: IDR. 201 / Kg	
	- Actual fertilization wages (valid now): IDR. 200 / kg	
	- There is a gap of: 0.66% positive.	
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	D, 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. Ass	2. Assessment of wages paid (prevailing wages) and in-kind benefits.			
Once the	e 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 the verification of employee data for April 2022 period, PT IIS – Ukui II POM has permanent and non-permanent employees (SKU and PHL). The unit certification has identified those related to the main work in oil palm plantations based on the Circular Letter from GAPKI dated 8 February 2013 No. 073/GAPKI/II/2013 concerning the Circular on the Activity Flow of the Work Implementation Process in the Oil Palm Plantation Business Sector, stating that; only 2 (two) jobs that are the main activities in the Oil Palm Plantation industry, namely harvesting and processing products, the rest are supporting activities in accordance with Permenakertrans No. 19/2012 which implementation can be left to other parties.	Complied	



Based on the employees master period April 2022, that PT IIS – Ukui II still has temporary workers (Daily worker: PHL) who do harvesting.

The company has established a program for the appointment of PHL harvesters to Permanent workers (SKUH), as well as a program for the appointment/promotion of PHL harvest workers. This harvester employee appointment/promotion program has been submitted to the District Manpower and Transmigration Office of Pelalawan Regency:

Sei Lala Estate:

Company has promoted the appointment of PHL harvesters, as follow:

- In 2021, 12 harvesters have been appointed PHL harvesters to become SKUH based on Memorandum No. #263-271/HR-RO2/MEMO/SK/10/2021 dated 19 October 2021.
- Semester I of 2022, 14 harvesters of PHL have been appointed as SKUH based on Memorandum No. #129-143?HR-RO2/MEMO/SK/04/2022 dated 26 April 2022. Appointment program for PHL harvesters in the Semester II of 2022 as many as 12 harvesters.
- Promotion plan for the appointment of the next PHL harvesters per year as many as 14 harvesters.

Temporary workers shall be regulate to use not only for harvesting but will be used for another supporting jobs such as: upkeeping, pruning, EFB application). Estate manager and assistant monitor the temporary workers usage in accordance with labor regulation.

Soga Estate:

Company has promoted the appointment of PHL harvester to SKUH, as follow:

- In 2021, as much as 22 harvesters have been appointed PHL harvesters to become SKUH based on Memorandum No. #154-161/HR-RO2/MEMO/SK/06/2021 dated 21 June 2021 as much as 13



harvester and Memorandum no. #281-283/HR-RO2/MEMO/SK/10/2021 dated 23 October 2021 as much as 3 harvester

- In Semester I of 2022: promoted the appointment is based on Memorandum No. #013--018/HR-RO2/MEMO/SK/01/2022 dated 31 January 2022 as much as 7 harvester. Based on Memorandum No. ###/MI-KSA/MEMO/IV/2022 dated 22 April 2022 as much as 7 harvester and Appointment program for PHL harvesters in the Semester II of 2022 as many as 10 workers.

Promotion plan for the appointment of the next PHL harvester per year as many as 18 harvesters.

Temporary workers shall be regulate to use not only for harvesting but will be used for another supporting jobs such as: upkeeping, pruning, EFB application). Estate manager and assistant monitor the temporary workers usage in accordance with labor regulation.

Ukui II Mill:

Based on the list of employees of Ukui II Mill up to May 2022, there were 104 employees consisting of 88 SKU employees and 16 PHL employees. Ukui II Mill has made a PHL employee appointment program that has been known by the District Manpower and Transmigration Office, Pelalawan Regency:

The company has promoted the appointment of PHL workers, as follows:

- In 2021, 7 workers have been appointed PHL to become SKUH based on Memorandum No. #39-42/MI-PUD/MEMO/02/2021 dated 09 February 2021.
- Appointment program for PHL in the Semester II of 2022 as many as 11 workers, then the program for appointing PHL in Semester I of 2023 as many as 12 harvesters. So that the rest plan for the

		appointment of PHL employees is 12 PHL workers. Currently the temporary workers are not used as main work at mill.	
	ation and collective bargaining are restricted under law, the employer f	and join trade unions of their choice and to bargain collectively. Where the right to fracilitates parallel means of independent and free association and bargaining for a	
6.3.1	(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.	PT Inti Indosawit Subur — Ukui Group has company policy signed by Managing Director on 01 December 2019. The policy stated company guarantee freedom of association or be part of worker union as well as collective bargaining. There is a union for PT IIS-Ukui Group. 017/SK/DPWF-SBSI/PLW/XII/2021 dated January 6, 2022, regarding the composition of the Basic Management of PT Inti Indosawit Subur (IIS) Ukui Federation of Indonesian Solidarity Trade Unions in Pelalawan Regency, stipulates: - Chairman : Sharul Mizan - Vice Chairman KSL : Heri Manurung - Vice Chairman PUD : Herman F.L - Secretary 1 : Hilman - Secretary PUD : Aston Sirait - Treasurer 1 : Markun - Treasurer PUD : Masdianto - Division Representative: 1. Workshop: Jandri B 2. Process (1): Yeki S. 3. Process (2) Wiwin Marunda - Advisor 1: Darianto - Advisor 2: Merianto Purba.	plied



There is a worker union for Estate (Soga Estate and Sei Lala Estate) and Ukui II POM named "Pengurus Unit Kerja (PUK) Serikat Pekerja Pertanian dan Perkebunan-Serikat Pekerja Seluruh Indonesia (PUK-SPPP-SPSI) PT Inti Indosawit Subur Kebun Ukui dan Pabrik Ukui Satu" as per "Surat Keputusan Pengurus Cabang Federasi SPPP-SPSI Kabupaten Pelalawan No.Kep. 17-A/PC-FSP.PP/K-SPSI/PLLW/10/2017" dated 15 October 2017 and valid for 5 years.

Organization Structure of Pengurus Unit Kerja (PUK) Serikat Pekerja Pertanian dan Perkebunan (SPPP)- Serikat Pekerja Seluruh Indonesia (SPSI) PT Inti Indosawit Subur Kebun Ukui is as follows:

- Chairman : Zainal A. Bangun

- Vice Chairman: Rahmad

: Sumardi

- Secretary : M. Yunus

- Vice Secretary : Watri Efendi

PT IIS-Ukui Group workers union has been registered in Dinas Tenaga Kerja (Manpower Agency) of Pelalawan Regency on 7 December 2006 as mentioned in "Tanda Bukti Pencatatan Serikat Pekerja" No. 004/Disnaker/PEN/SPPP-SPSI/2006 named PUK-SPPP-SPSI PT Inti Indosawit Subur Kebun Ukui.

Scheme Smallholder:

Ukui scheme smallholder has had organization's policy: "Kebijakan Manajer Group ICS" dated 11 August 2020. Related the freedom of association, it has mentioned on point 12: "Menghormati setiap karyawan KUD atau petani untuk membentuk atau menjadi anggota serikat pekerja serta berkumpul dan berserikat atau berorganisasi". This policy is made in Bahasa Indonesia, this is in order to facilitate understanding by all farmers.

		Its policy has been disseminated to all head of farmer group and farmer on 11 Augusts 2020 and attended by 83 farmers.	
6.3.2	Minutes of meetings between the unit of certification with trade unions or worker representatives who are freely elected, are documented in the national languages and available upon request.	SPSI meeting with management, including: 1. The meeting between SPSI and the Management of PT IIS on 2 July 2020, there were several discussions, including: - Transparency of harvest quality assessment - Yet consistent SIM-making budget help - Residential Hygiene and housing fogging schedule 2. Minutes of the meeting for the meeting on 12 February 2022, a meeting to discuss related: - Submission of production targets to be achieved in accordance with harvester productivity, so that there is no shortage of labor. - Obligation to use PPE so that accidents do not occur. - Socialization regarding employee bonuses.	Complied
		 Socialization of sanitation and handling of waste in housing. Minutes of meeting dated 16 February 2022, the discuss related to use of PPE and the presence of employees. 	
6.3.3	Management does not interfere with the formation or operation of registered labour organizations/unions, or other freely elected representatives for all workers, including migrant and contract workers.	PT Inti Indosawit Subur — Ukui Group has company policy signed by Managing Director on 01/12/2014. The policy stated company guarantee freedom of association or be part of worker union as well as collective bargaining.	Complied
		Based on interview with the chief of union labor, that in the formation of trade unions, enterprises Provide freedoms related to the drafting of the organizational structure of trade unions. The company does not interfere in affairs and influences in the preparation of trade union organizers.	



		Based on the interview with the manager of the parent trade union as well as Estate and POM Coordinator (Mr. Teuku Mursalin and Mr. Abert Butar Butar and Toni Siregar), the management does not intervene in the formation/the establishment of a union manager, but the facility/office is indeed provided. Management also provides allowance to the workers 'Union officers to hold events related to the unions organization e.g. permission to hold board meetings, electing admins etc. PT IIS-UKUI Group has been established bipartite Cooperation Institute (LKS) and meeting with management once a month.	
Criteria	6.4: Children are not employed or exploited.		
6.4.1	A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.	PT Inti Indosawit Subur – Ukui II POM has established a formal policy for the protection of children, including prohibition of child labour and remediation as per " <i>Kebijakan Perusahaan</i> ", was signed by management on 01 December 2019, in point 14 was stated: It is not allowed all children to work in each activities in operational. Verification of Estate (Soga Estate and Sei Lala Estate) employee data period April 2022 shows that no indication of worker with age below 18 years old during recruitment or at the present time. Sample verified: 1. Yudha Paksyu H. (PHL – Soga Estate), birthdate 31 March 2000 and joined on 1 January 2019 or at age 18 years and 9 months. 2. Adianta (PHL – Soga Estate), birthdate 8 March 2001 and joined on 14 August 2019 or at age 18 years and 5 months.	Complied
		Scheme Smallholders:	
		Group Manager has established the formal policy for the protection of children, including prohibition of child labour and remediation as per Cooperative Policy — "Kebijakan Koperasi" date 11 August 2020, in point 10 was stated "Melarang anak-anak bekerja dalam setiap kegiatan	

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		operational keburl" — prohibit the children to works in operational smallholders. Based on document verification has shown that no indication of using child labour or worker under 18 years old. The youngest workers namely Mr Aris (harvester at KUD Karya Tani date of birth 17 April 1989 (dated of joined 1 January 2015), 25 years old and 8 months. Mr. Erwin as harvester at KUD Tani Bahagia, date of birth on 6 December 1990 and date of joined on 1 January 2015, 24 years and 1 month.	
6.4.2	(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.	Ukui II POM and Estate: 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. Data seen: - Sandi (PHL – Soga Estate), birthdate 16 July 2002 and joined on 11 January 2021 or at age 18 years and 6 months. - Disiplin Gohae (PHL – Sei Lala Estate), birthdate 04 May 2001 and joined on 08 March 2022 or at age 20 years and 10 months. Based on verification of employees register and payroll period April 2022, it was no found workers hired under 18 years. Scheme Smallholder: Based on document verification has shown that no indication of using child labour or worker under 18 years old. The youngest workers namely Mr Imam (harvester at KUD Karya Tani date of birth 20 April 1992 (dated of joined 4 January 2021), 28 years old and 9 months. Mr. Lektom as harvester at KUD Mekar Abadi, date of birth on 12 June 1990 and date of joined on 14 December 2021, 31 years and 5 month.	Complied

6.4.3	(C) Young person maybe employed only for non-hazardous work with	Ukui II POM and Estate:	Complied
	protective restrictions in place for that work.	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.	·
		Data seen:	
		- Sandi (PHL – Soga Estate), birthdate 16 July 2002 and joined on 11 January 2021 or at age 18 years and 6 months.	
		- Disiplin Gohae (PHL – Sei Lala Estate), birthdate 04 May 2001 and joined on 08 March 2022 or at age 20 years and 10 months.	
		Based on verification of employees register and payroll period April 2022, it was no found workers hired under 18 years.	
		Scheme Smallholder:	
		Based on document verification has shown that no indication of using child labour or worker under 18 years old. The youngest workers namely Mr Imam (harvester at KUD Karya Tani date of birth 20 April 1992 (dated of joined 4 January 2021), 28 years old and 9 months.	
		Mr. Lektom as harvester at KUD Mekar Abadi, date of birth on 12 June 1990 and date of joined on 14 December 2021, 31 years and 5 month.	
6.4.4	The unit of certification demonstrates communication about its 'no	Ukui II POM, Estate and smallholder:	Complied
	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.	Based on interviews with contractors, officers of unions, the farmers group as well as officers in the field indicates that they have understood management policy to prohibit the use of the child labor in all types of the company's operations activities.	
		Based on the verification document shows that the management have done socialization ban on the use of child labor policy through:	
		Put up the policy in the bulletin board in every office/mill estate	



		Do direct socialization to workers especially vulnerable types of workers who are utilizing "informal worker" who are children like at the harvesting (harvesting) that is prohibited include the sons of workers to help her parents work (picking the lose fruit). Lists the prohibition clause on each contract with contractors power the use of child documents.	
Criteria (6.5: There is no harassment or abuse in the workplace, and reproductive	e rights are protected.	
6.5.1	(C) A policy to prevent sexual and all other form of harassment and violence is documented, implemented and communicated to all levels of the workforce.	PT Inti Indosawit Subur – Ukui Group has established a policy to protect the reproductive rights as it is found in Company Policy that's signed by Managing Director, dated 01st December 2019 and on one part of the policies stated that: "Mencegah pelecehan seksual dan berbagai bentuk kekerasan terhadap perempuan serta melindungi hak-hak reproduksinya (To prevent any sexual or physical abuses happen to women as well as to protect their reproductive rights)". This policy was dissemination on March 2, 2022 to all workers and all level. There is a gender committee actively meets and discussing general agenda and other issue related to handling sexual harassment, dissemination of sexual harassment prevention. Implemented policy on prevention of sexual harassment and violence against women, the policy is prominently displayed on notice boards at the Mills and the Estates muster areas.	Complied
		Scheme Smallholders:	
		Plasma Ukui Group has demonstrated the policy to prevent sexual harassment and violence against women in "Kebijakan ICS Group Manager" issued dated 11 August 2020, in chapter 11 was stated "Mencegah pelecehan sexual dan berbagai bentuk kekerasan terhadap perempuan serta melindungi hak hak reproduksinya (prevent sexual	



		harassment and violence as well as protect reproductive rights for women)". The policy has communicated to all scheme smallholders member on 11 September 2021 (attended by 30 participants/farmers) and displayed in publication board in each KUDs office.	
6.5.2	(C) A policy to protect the reproductive rights of all, especially of women, is documented, implemented and communicated to all levels of the workforce.	PT Inti Indosawit Subur — Ukui Group has established a policy to protect the reproductive rights as it is found in Company Policy that's signed by Managing Director, dated 01st December 2019 and on one part of the policies stated that: "Mencegah pelecehan seksual dan berbagai bentuk kekerasan terhadap perempuan serta melindungi hak-hak reproduksinya (To prevent any sexual or physical abuses happen to women as well as to protect their reproductive rights)". There is a gender committee actively meets and discussing general agenda and other issue related to handling sexual harassment, dissemination of sexual harassment prevention. Implemented policy on prevention of sexual harassment and violence against women, the policy is prominently displayed on notice boards at the Mills and the Estates muster areas. Interviews of female staff, workers and union representatives confirmed that the company implemented the sexual harassment policy. The company is regularly perform monitoring of pregnancy in monthly bases, for period January — April 2022, there were reported no workers in pregnant condition (negative detection).	Complied
		Scheme Smallholders:	
		Plasma Ukui has demonstrated the policy to prevent sexual harassment and violence against women in "Kebijakan ICS Group Manager" issued dated 11 August 2020, in chapter 11 was stated "Mencegah pelecehan sexual dan berbagai bentuk kekerasan terhadap perempuan serta	

		melindungi hak hak reproduksinya (prevent sexual harassment and violence as well as protect reproductive rights for women)". The policy has communicated to all scheme smallholders member and displayed in publication board in each KUDs office. The policy has communicated to all scheme smallholders member on 11 September 2021 (attended by 30 participants/farmers) and displayed in publication board in each KUDs office.	
6.5.3	Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified in accordance with applicable regulations in Indonesia.	For breastfeeding mothers and had children under 5 years, the company has provided child care (TPA) which is located in each division/Afdeling. In landfill space as well as the company provides a special space and time for 1 hour for breastfeeding mothers in need time to nursing his baby.	Complied
6.5.4	A grievance mechanism, which respects anonymity and protects complainants where requested, as long as the complaint is supported with adequate information, is documented, implemented and communicated to all levels of the workforce.	PT Inti Indosawit Subur – Ukui Group has prepared procedure on a specific grievance mechanism which respects anonymity of complainants under Standard Operating Procedure, No. SOP:-HR-308.5-RO; Revision:0, 11/12/2009: Employees complaints: Submission and settlement.	Complied
		Mechanism for complaints management where it needs to protect its confidentiality for complaint submitter was found in company policy's draft as in one of points of this policies stated that: "to provide appropriate information for those who inquiry it and to protect its confidentiality for whistleblower cases in accordance to law regarding environmental and social issue, food safety, health and safety work, so that it enables them to more participate to the decision making processes for improving company's performance.	
		Record of complaint/specific grievance has demonstrated under "Buku Keluhan Karyawan", e.g.: in Afdeling III Sei Lala Estate there were 10 complaints/grievances recorded and each recommendation responses has been followed up, for example:	



		 Complaint on 12 May 2022 from employee namely Budi, related damage to the door and window glass, this complaint has followed up on 12 May 2022. Complaint on 20 May 2022 from employee namely Riki, related damage to kitchen doors, this complaint has followed up on 20 May 2022. Complaint on 12 May 2022 from employee namely Fatimano, related damage to the zinc roof, this complaint has followed up on 12 May 2022. Scheme Smallholders: The scheme smallholders have mechanism of consultation and communication in "Mekanisme komunikasi, konsultasi dan keluhan Kebun Plasma Ukui Group", dated 16th January 2018. Based on log book of record in the form of "Penerimaan Keluhan dan Tanggapan". On 2022 period, there was no grievance reported, all of 	
Criteria	6.6: No forms of forced or trafficked labour are used.	complaints has been followed and recorded.	
6.6.1	 (C) All work is voluntary and the following are prohibited: 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 	Estate, POM and Scheme Smallholder: Based on the interview with KTU as well as the document of recruitment that there was no indication companies both of Inti and smallholder at Ukui Group to do practices: • Retention of identity documents or passports • Payment of recruitment fees • Contract substitution • Involuntary overtime • Lack of freedom of workers to resign	Complied

	 Debt bondage Withholding of wages 	 Penalty for termination of employment Debt bondage Withholding of wages Based on verification of employee appointment documents for the period of 2022, it is not identified that there is a process that is carried out related to the anchoring of identity cards, the granting of fees in the recruitment process, accidental overtime, giving jobs due to debts and withering wages. The company also provides freedom in relation to termination of work without any fines. 	
6.6.2	(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.	According the list of employees on period April 2022, Ukui Group is still using contract workers (PKWT) and temporary workers (PHL) status as many as 499 people, e.g.: PKWT as much as 17 and PHL as much as 482 people. PT IIS – Ukui Group PT Inti Indosawit Subur has issued Memorandum No. 085/EXT-PUS/08/2020 dated 12 August 2020 concerning Policy for the acceptance and appointment of employees of PT Inti Indosawit Subur – Ukui Group; where in the memorandum explained related to the acceptance of employees with PHL status, while workers who are directly related to production (harvesting, FFB loader, CPO and PK processing operators) are declared with PKWT status and will be evaluated and if feasible will be promoted to become permanent workers.	Complied
Criteria	6.7: The unit of certification ensures that the working environment unde	r its control is safe and without undue risk to health.	
6.7.1	(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.	PT Inti Indosawit Subur – Ukui Group 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). Samples seen: a) Sei Lala Estate	Complied



- Certificate of Supervision of Occupational Safety and Health Norms of Occupational Safety and Health Expert on behalf of Deni Yuandana, Certificate number 5/2151/AS.02.04/II/2020 dated 28 February 2020
- License "K3 Expert Authority Card No.Reg.83827/PK3/AJ/52/2020/P0 in the name of Deni Yuandana" valid until 28 February 2023.
- Decree of the Minister of Manpower of the Republic of Indonesia Number 5/1965/AS.02.04/II/2020 concerning Appointment of General Occupational Safety and Health Expert on behalf of Deni Yuanda" dated 28 February 2020, valid for 3 years

b) Soga Estate

- Certificate of Supervision of Occupational Safety and Health Norms of Occupational Safety and Health Expert on behalf of Wiwit Muliono, Certificate number 5/8623/AS.02.04/XI/2020 dated November 30, 2020
- License "K3 Expert Authority Card No.Reg.90308/PK3/AJ/14/2020/P0 on behalf of Wiwit Muliono" valid until 30 November 2023.
- "Decree of the Minister of Manpower of the Republic of Indonesia Number 5/14193/AS.02.04/XI/2020 concerning Appointment of General Occupational Safety and Health Expert on behalf of Wiwit Muliono" dated 30 November 2020, valid for 3 years

c) Ukui II POM

• Certificate of Supervision of Occupational Safety and Health Norms of Occupational Safety and Health Expert on behalf of



		Ruliancen Warinangin, Certificate number 5/5858/AS.02.04/IX/2021 dated 6 September 2021	
		 License "K3 Expert Authority Card No. Reg.101508/PK3/AJ/65/2021/P0 in the name of Ruliancen Warinangin" valid until 6 September 2024. 	
		 "Decree of the Minister of Manpower of the Republic of Indonesia Number 5/9992/AS.02.04/XI/2021 concerning Appointment of General Occupational Safety and Health Expert on behalf of Ruliancen Warinangin" dated 6 September 2021, valid for 3 years 	
		d) Record of monthly meeting (P2K3), sample seen for period January – March 2022, agenda meeting: review on previous OHS meeting, review of inspection of PPE usage, review on accidents report.	
		e) Quarterly report of OHS performance for period January — March 2022 and October — December 2021 was sent to Manpower Agency in Riau	
		Scheme smallholders:	
		Each KUD has established a team who has been responsible on implementation and implementation the OHS program, e.g. the structure of emergency responses in each KUD.	
6.7.2	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	PT Inti Indosawit Subur – Ukui Group POM has defined the procedure for emergency response under Standar Operatonal Procedure – Environmental Field Procedure, such as:	Non- compliance
	aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.	Nomor AA-KL-11-EFP tentang Penangnan Tumpahan di Laboratorium	
	Rept and periodically reviewed.	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

PT Inti Indosawit Subur – Ukui Group POM has also pepared the procedure on work accident under "Standard Operasioanl Prosedur – Investigasi Kecelakaan Kerja nomor AA-SMK3-18001.02-R0", revision 0 dated 1st April 2018.

Data verified - during onsite 20212:

- Emergency response team has defined as in "Struktur Organisasi Tanggap Darurat" year 2022.
- List of first aid kit (include portable first aid) as in "List Kebutuhan Obat-Obatan P3K updated in May 2022.

Minor non-conformance:

The organization have an emergency procedures but its implementation is inconsistent as following.

- Harvester Foreman at Soga Estate could not explain first aid treatment if the harvester gets bitten by venomous snake.
- Fire extinguisher in Mill Workshop was not monitored regularly and has been expired on 22 July 2021 (need to refill).
- Fire extinguisher in Clinic Soga Estate has been expired and there is no monitoring checklist.
- Eye wash and handwash at Fertilizer Warehouse Soga Estate were not function properly.

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		At Agrochemical Warehouse Soga Estate there is no Accident and Emergency Procedure.	
6.7.3	(C) Workers use appropriate personal protective equipment (PPE) which is provided free of charge to all workers in the workplace, to cover all potentially hazardous operations, such as pesticides application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.	PT Inti Indosawit Subur – Ukui II POM has demonstrated the record of realization the OHS program 2022 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: Report of MCU for all workers in Ukui II POM was conducted by "Focus Clinical Laboratory" on 16 -17 March 2022. The MCU was covered urine test, HSaAg and fisical test	Complied
		• Monitoring of emergency response and preparedness facilities, i.e: fire hydrant. Based on field visit in Ukui II POM at 27 th May 2022, the performance of hydrant was well.	
		Report of OHS inspection report, location in Ukui II period Jnauary – March 2022 – reported OK for PPE usage, and OHS facilities (fire hydrant and fire extinguisher)	
		Delivery note of APD for harvesters and fertilizer worker in Sei lala Estate dated 7 th March 2022	
		Delivery note of APD for harvesters and fertilizer worker in Soga Estate dated 4 th March 2022 and 28 th March 2022	
		Delivery note of APD for Ukui II dated 20 th May 2022	
		Based on field visit on 27 th May 2022 for harvesters workers in block D29A in Division IV Soga Estate the risk impact probability was wound/cut and eyes disease, control by using appropriate PPE (eye wear/safety glasses, masker and hand glove) and regular training for them.	
6.7.4	All workers are provided medical care and covered by accident insurance. Costs incurred from work related incidents, leading to injury or illness, are covered in accordance with applicable regulations or by	PT Inti Indosawit Subur – Ukui Group 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	Complied

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	the unit of certification if applicable regulations do not provide protection.	 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. PT Inti Indosawit Subur – Ukui Group has provided regular medical checkup for workers in high risk such as sprayer team, fertilizer applicator, workshop worker and mill operators. Data verified: Sei Lala estate; record for payment of works insurance (BPJS Ketenagakerjaan) period April 2022 with amount of IDR 56,684,796. Status PAID Soga Estate: record for payment of works insurance (BPJS Ketenagakerjaan) period April 2022 with amount of IDR 49,604,162. status PAID. Ukui II POM: record for payment of works insurance (BPJS Ketenagakerjaan) period April 2022 with amount of IDR 4,785,740 status PAID. Scheme smallholders: The government covers medical insurance for smallholders and it is optional. Based on interview with smallholders, most of farmers/smallholders has had insurance (BPIS Kesenatan Mandiri). 	
		month February – April 2022	
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	PT Inti Indosawit Subur – Ukui II POM has been kept the record of occupational injuries using LTA metrics under "Data Laporan Kecelakaan Kerja" year 2022.	Complied

		Data seen: — In period January — April 2022 no cases of incident Scheme Smallholders The record of injuries has shown under document of "Monitoring Kecelakan Kerja 2022", since 2018 to 2022 there were no injuries cases (Nil). Based on interview with sample of smallholder member, there was no injuries cases occurred.	
Principle	e 7: Protect the environment, conserve biodiversity and en		
Criteria technique	·	are effectively managed using appropriate Integrated Pest Manag	ement (IPM)
7.1.1	(C) IPM plans are implemented and monitored to ensure effective pest control.	 Soga & Sei Lala Estate: According to the Agricultural Policy Manual SOP AA-APM-OP-1100.10. R6 Pengendalian Hama dan Penyakit (Pests & Disease Control), certificate holder has plan to implement integrated pest management. Based on document verification of Soga and Sei Lala Estate obtain information that management has had a schedule to regularly monitored pest attack (census) as follows: Census of caterpillar/bag worm by monthly basis. Census of Ganoderma annually. Census rat infestation by recap the record of sortation in loading ramp. Census of Barn Owl Box occupation in three monthly bases. The last census in Soga and Sei Lala Estate has been conducted in second week of March 2022. Result of census shows that pest attack still under control (below the economic threshold) which is limit 5%. 	Complied

		During the field visit in own estate (Sei Lala Estate block I9 Afdeling 1) and smallholder's area (KUD Tani Subur, KUD Karya Tani and KUD Mekar Abadi), 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. Scheme Smallholder: According to document verification, pest monitoring and control sighted pest management plan to conduct caterpillar/bag worm census in by monthly and barn owl box monitored in three monthly bases. Census was conducted by field supervisor that help by person that assign by board of	
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.	KUD. 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.	Justification of pesticide used is explained under company procedure of weed control - "SOP Pengendalian Gulma No. AA-APM-OP-11100.08- R1" dated 1 November 2008. Chapter IV explains the weed control program for woody, grass, fern, caladium, wild banana (<i>Musa</i> spp), <i>Asystasia</i> , etc. It does explain active ingredients use to control such weed, dosage per application, type of nozzle used and volume of spraying per application. Chapter V explains selection of pesticide and its active ingredients content, nature of the pesticide and target species. Chapter VII describes	Complied



calculation of actual area implemented per hectare plantation (spray factor), spraying rotation and spraying output.

Spraying works were conducted by selected spraying on specific target, for example weeds spraying on circle, path and TPH (collecting point). Other areas beside specific area were not applied. Riparian area along the river are prohibits to be performed spraying to minimize and reduce the negative environmental impact to the river and ecosystem. Pesticide and herbicide used by company was registered in the book of pesticides - "Komisi Pestisida" and has permit from government.

Type of pesticide use by Soga & Sei Lala Estate and its weeds target are as example below:

Agrochemical	Active ingredients	Register No.	Weeds target
Kenlon 480 EC	Trikolopir Bitoksi Etil Ester 480 g/l	RI.01030120062433	Wood
	Etil Estel 400 g/l	Valid until: 31 Dec 2021	
Elang 480 SL	Isopropil Amina	RI.01030119941170	Narrow leaf weed,
	Glifosat 480 g/l Valid until: 21 Dec 2021		Asystasia, Imperata cylindrical
Kenrane 288 EC	Floroksipir 1-MHE : 288 g/l	RI.01010120103759	Legume, Asystasia
	. 200 g/i	Valid until: 20 Dec 2020	
Basta 150 SL	Amonium	RI.01030119921113	Wide leaf
	Glufosinat 150 g/l	Valid until 22 Jan 2024	(Ageratum conyzoides);
			narrow leaf (Axonophus
			compressus,
			Imperata cylindrica,
			Ischaemum timorense,

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			Ottochloa nodosa, Setaria palmifolia).
Karmex 80 WP	Diuron 80%	RI.01030120113958	broadleaf weeds (Borreria latifolia, Asystasia intrusa, Clidemia hirta, Mikania micrantha) and narrow leaf weeds (Imperata cylindrica, Cyperus rotundus, Cyclosorus aridus)

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: *Pengendalian Gulma* (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).

During the audit, found some pesticide list that usually used with active ingredients such as *isopropyl amine glyphosate, fluoroksifir, methyl metsulfuron, triklofir, diuron, diuron, lamda sihalotrin and 2,4-D dimetil amina, bacillus thuringiensis berliner, ammonium glufosinat, acephate, copper oxide* and *mancozeb*. 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. 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.

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		During the ingredient glyphosat the smalll glyphosat	Scheme Smallholder: During the audit, sighted the list of pesticide recommendation (by active ngredients) that can used by smallholder such as isopropyl amine glyphosate, fluoroksifir, methyl metsulfuron and triklofir. During Y2021, the smallholders used pesticide with active ingredients isopropyl amine glyphosate, fluoroksifir and methyl metsulfuron. There is no record of parakuat diklorida usage.						
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.	based on has calcul For examp of active i the calcula	Certificate holder has showed the record of LD50 calculation in each unit based on amount of pesticide used. For example, Sei Lala and Soga Estate has calculated the LD50 of each pesticide in a monthly basis. For example, Kebun Luar Ukui has calculated the LD50 based on amount of active ingredients applied per Ha and number of applications. Through the calculation of pesticide usage during January – December 2021 known that LD50 of isopropyl amina glifosat was 0.2841 mg/Ha.						Complied
		Brand	Active Ingredient	LD50	Total Used	Total Active Ingredient	Ratio Active Ingredient /Ha	Ratio per Kg producti on	
		Kenlon 480EC	Trychlopyr butoxy ethyl ester	500	299.7	143856	0.137	0.000	
		Meta Prima	Methyl metsulfuron	5000	557247	267478.5 6	255.228	0.000	
		Lindomin 865AS	Dimethylamin e	2872	50.69	24.3312	0.023	0.000	
		Supremo 480SL	Isopropil amina glifosat	5000	1806.13	866.9424	0.827	0.000	

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Basta 150SL	Amonium glufosinat	2000	6	2.88	0.003	0.000
Kencepat 75 SP	Asefat	1000	5	2.4	0.002	0.000
Sweeper 480SL	Isopropil amina glifosat	2700	2000.55	960.264	0.916	0.000
Elang 480 SL	Glyphosate	2000	334.9	160.752	0.153	0.000

Sei Lala Estate – 2022 (April)

Brand	Active Ingredient	LD50	Total Used	Total Active Ingredien t	Ratio Active Ingredie nt/Ha	Ratio per Kg producti on
Kenlon 480EC	Trychlopyr butoxy ethyl ester	500	441.2	211.776	0.202	0.000
Meta Prima	Methyl metsulfuron	5000	132536	63617.2 8	60.704	0.000
Supremo 480SL	Isopropil amina glifosat	5000	1383.66	664.158	0.136	0.000
Basta 150SL	Amonium glufosinat	2000	28.7	13.776	0.013	0.000
Sweeper 480SL	Isopropil amina glifosat	2700	0.56	0.2688	0.000	0.000
Basis 150SL	Amonium glufosinat	2000	24.1	11.568	0.011	0.000

Soga Estate - 2021



Brand	Active Ingredient	LD50	Total Used	Total Active Ingredien t	Ratio Active Ingredie nt/Ha	Ratio per Kg producti on
Kenlon 480EC	Trychlopyr butoxy ethyl ester	500	121	58.08	0055	0.000
Meta Prima	Methyl metsulfuron	5000	476	228.48	0.218	0.000
Lindomin 865AS	Dimethylamin e	2872	324.77	155.889 6	0.149	0.000
Supremo 480SL	Isopropil amina glifosat	5000	1703.95	817.896	0.780	0.000
Basta 150SL	Amonium glufosinat	2000	50	24	0.023	0.000
Kencepat 75 SP	Asefat	1000	70	33.6	0.032	0.000
Sweeper 480SL	Isopropil amina glifosat	2700	1277	612.96	0.585	0.000
Solusi 865SL	2.4 Dimetil amina	500	551.2	264.576	0.252	0.000
Polydor 25EC	Lambda cyhalothrine	2626	18	8.64	0.008	0.000
Dithane M45 80WP	Mancozeb	5	33	15.84	0.015	0.000
Gulmaro n 80WP	Diuron	200	127	60.96	0.058	0.000
Perfekta n 425 EC	Dimetoat	500	70	33.6	0.032	0.000



Kenrai 288EC	ane Floroksipir C 200 gl	447	3	1.44	0.001	0.000
Soga	Estate – 2022	(April)				
Bran	nd Active Ingredient	LD50	Total Used	Total Active Ingredien t	Ratio Active Ingredie nt/Ha	Ratio per Kg producti on
Kenlor 480EC		500	84	40.32	0.038	0.000
Meta Prima		5000	248380	119222	113.762	0.000
Lindor 865AS		2872	0.25	0.12	0.000	0.000
Suprei 480SL	emo Isopropil L amina glifosat	5000	1300.5	624.24	0.596	0.000
Basta 150SL		2000	60	28.8	0.027	0.000
Kence 75 SP	epat Asefat	1000	1	0.48	0.000	0.000
Dithar M45 80WP		5	2	0.96	0.001	0.000
Gulma n 80W	aro Diuron WP	200	75	36	0.034	0.000
Agron 75WP	nil Klorotalonil	5000	5.4	2.592	0.002	0.000

7.2.3	(C) Any use of pesticides is minimised as part of a plan, eliminated	Until this recertification audit obtains information that there is no pesticide	Complied
	where possible, in accordance with IPM plans.	use for control pest attack. All of pesticide only using for weeding (herbicide).	•
		Based on interview with IPM supervisor and smallholder representatives known that no outbreak that causes pesticide usage.	
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
7.2.5	Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat, are not to be used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.	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.	Complied
	The due diligence refers to:	There is no use of other pesticide class 1A and 1B until the audit.	
	7.2.5a Judgment of the threat and verify why this is a major threat.	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).	
		During the audit, found some pesticide list that usually used with active ingredients such as <i>isopropyl amine glyphosate, fluoroksifir, methyl metsulfuron, triklofir, diuron, diuron, lamda sihalotrin and 2,4-D dimetil amina, bacillus thuringiensis berliner, ammonium glufosinat, acephate,</i>	

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	copper oxide and mancozeb. 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.
	To reduce the human and environmental risk, there is some continuous action that has been implemented as follows:
	Set up the pesticide rotation. For example, chemical weeding rotation is 4 times a year where the rotation in immature and early mature more often than mature and old palm.
	Using the ultralow volume nozzle to minimize water consumption and reduce the risk for environment. During the field visit to the pesticide store sighted the micron herby system knapsack as example.
	Conducted regularly training for pesticide applicator and equipped them with appropriate PPE's.
	Delaying the pesticide if weed or pest is under control. According to the interview with estate manager obtain information that the 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.	According to IPM procedures, certificate holder always using biological approach in order to monitor pest attack. For example, estate using <i>Tyto alba</i> to monitor rat infestation than using rodenticide.
	To maintain ground condition especially weeding control, certificate holder has had a procedures SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i> (Weed Control). This procedure has set the specific pesticide in with minimum risk in accordance with the target.
7.2.5c Which process was applied to verify why there is no other less hazardous alternative.	Certificate holder through Asian Agri's Research and Development Department has examined some pesticide in specific target. The result of

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		examination and pesticide recommendation written in the SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i> (Weed Control).	
	7.2.5d Process to limit the negative impacts of the application.	SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i> (Weed Control) has set some procedures to reduce negative impact of the application as follows:	
		Pesticide/herbicide selection to ensuring the application is effective.	
		Set up the appropriate nozzle in chemical weeding activity based on weed type, topography and availability of water.	
		 Regularly spraying calibration to ensuring the application is effective and efficient. 	
		Calculate pesticide/herbicide usage based on target (hectarage and weed type).	
		Spraying technic.	
	7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.	Certificate holder did not use pesticide to eradicated pest without the outbreak. If any census result shows the pest attack almost reach the economical threshold, they usually conducted campaign test using pesticide if needed.	
		Chemical weeding activity has regularly set by management. For example, normally circle, path and collecting point weeding conducted 4 times a year in immature and mature area. Its rotation can be reduced in line with the palm ages.	
7.2.6	(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they conduct.	PT Inti Indosawit Subur – Ukui Group has assigned chemical weeding team (<i>Tim Unit Semprot/TUS</i>) in each estate/unit to handling chemical weeding activity. The team member originated from own workers (for own estate) and local communities (for smallholder). They regularly attended training on pesticide handling that conducted by the pesticide supplier in collaboration with local pesticide committee.	Complied

		Based on document review and interview with random pesticide applicator	
		known that they were attending the last training on pesticide handling on February 2020. Some topics that discuss such as safety pesticide handling, national regulation related to pesticide, symbol and label awareness and emergency procedure if any contamination or poisonous. The worker can describe purpose of PPE usage, attending regularly medical check and safety working procedures.	
		Workers that perform herbicide spraying in Sei Lala Estate and Soga Estate also perform spraying activity in smallholder plantation. Spraying team has been trained with pesticide handling training, agrochemical application training and limited pesticide training. Spraying team only handles herbicide to control the weed. Sprayers understood the type of chemical for each weed type, the hazard, the application and appropriate PPE use.	
		During onsite audit year 2022, auditor team has also interviewed sample of smallholder representatives in KUD Tani Subur, KUD Karya Tani and KUD Mekar Abadi and obtain information that the company has provide training session for them on how to be handling pesticide safely. For example, pesticide applicator shall use appropriate PPE during application, no smoke, avoid the direction of wind blows and cleaned their body after application to reduce contamination.	
7.2.7	(C) Storage of all pesticides in accordance with recognized best practices.	Location the pesticides storage in Soga Estate and Sei Lala Estate. Pesticides are always applied in accordance with the product label and storage instruction. Agrochemical's 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	Complied

7.2.8	All pesticide containers that are disposed	Specific Guidance for 7.2.7:	Complied
		All waste products have 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 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. 	
		Water wash of pesticides containers collected in "spillage trap"	
		 Operation control: MSDS are available for all types of existing pesticides and he pesticide management and safety instructions are available A package management/ used pesticide package is available 	
		- PPE room	
		 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. 	
		 A good ventilation, 	
		Based on a field visit to the Pesticides Storage, there was found that: - Permanent Buildings,	
		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.	

Note Fo	r 7.2.11		
		Medical examination for smallholder's pesticide operator are include with Estate, because those chemical/spraying operators are work at Estate and Smallholders area. Sample: KUD Tani Subur, KUD Karya Tani and KUD Mekar Abadi.	
		Scheme smallholders:	
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.	Annual medical check-up was conducted in 16 – 17 March 2022 by Focus Clinical Laboratory – Pekanbaru for all workers handling with chemical, such as pesticide, herbicide and fertilizer applicator and also for PIC in pesticides storage.	Complied
7.2.10	(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.	Until this audit – 2022, there is no aerial application of pesticide throughout the company plantation and scheme smallholders.	Complied
		During field visit and interview with sample smallholder in KUD Tani Subur, KUD Karya Tani and KUD Mekar Abadi, they were well aware of the to manage the waste from ex fertilizer sack and empty chemical.	
	application of aerial spraying.	Group manager has a policy and mechanism to manage the waste from ex fertilizer sack according to procedure of "Prosedur Pemusnahan Wadah Bekas Bahan Kimia dan Diagram Alur Pembuangan Wadah Bekas Agrokimia". The ex-fertilizer sack must be handled by triple rinse and use as loose fruit sack, the inner bag of fertilizer was delivered to collector.	
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	All chemicals and empty containers collected and stored at permitted hazardous waste storage (Tempat Penyimpanan Sementara Limbah B3) as per Indonesia regulation, location in Soga Estate and Sei Lala Estate. Scheme smallholders:	Complied
	of and/or used for other purposes are managed according to applicable regulations and/or instructions on the packaging.	Handling of Hazardous and Toxic Substances (B3) refer to Government Regulation No. 74 of 2001 concerning Hazardous and Toxic Substance Management.	

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Referring to Act No. 13 of 2003 concerning Manpower, Act No. 35 of 2014 concerning Child Protection, and taking into account the risks of hazards on palm oil plantations and mills on the development and physical, mental and social health of children, the national interpretation mandates that the unit of certifications does not employ people under the age of 18 for pesticide spraying. For this reason, the provisions of young workers under 18 years in indicator 7.2.11 are irrelevant.

Criteria	Criteria 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.					
7.3.1	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented in accordance with applicable laws	PT Inti Indosawit Subur – Ukui Group and Estate collects all hazardous waste from estates and mill into temporary hazardous waste storage in central workshop compound.	Complied			
		PT Inti Indosawit Subur — Ukui Group 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				
		PT Inti Indosawit Subur — Ukui Group 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 Pelayaan Perijinan Terpadu nomor: KPTS-503/DPMTSP-LB3/2020/33, dated 29 December 2020, the license valid for 5 years. The hazardous waste is sent to the registered collector/transporter which approved by Environmental Ministry.				
		A documented waste management plan to avoid or reduce pollution and its implementation available under document of Environmental Aspect-Impacts (Evaluasi Aspek-Dampak Lingkungan) year 2022. The document covered all operation in mill, estate and its smallholders.				
7.3.2	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.	PT Inti Indosawit Subur – Ukui Group 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. The company store hazardous waste in temporary storage with permit, The hazardous waste is sent to the registered collector/transporter which	Complied			

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approved by Environmental Ministry, namely PT Hazmat Techno Indonesia.

Document of agreements and third parties licenses:

- SPK for Transport and Management of LB3 between PT Inti Indosawit Subur and PT Hazmat Techno Indonesia and PT Non Ferindo Utama. 09/SPJ/LEG-IIS/III/21 dated 26 March 2021. The agreement period starts from 26 March 2021 to 31 December 2022.
- PT Hazmat Techno Indonesia B3 Waste Transportation and/or B3 waste collection based on the Decree of the Director General of Land Transportation No. SK.00107/AJ.309/I/DJPD/2018 dated May 9, 2018 is valid for 5 years and the Approval Letter from the Investment Service and One Stop Integrated Licensing Service Number 660/1798.
- PT Non Ferindo Utama B3 waste management services based on the Decree of the Minister of LHK RI No. S.914/Menlhk/Setien/PLB.3/10/2019 dated October 18, 2019.
- SPK for Transport and Management of LB3 between PT Inti Indosawit Subur and PT Hazmat Techno Indonesia and PT Pengolahan Limbah Industri Bekasi No. 10/SPJ/LEG-IIS/III/21 dated 26 March 2021. The agreement period is from 26 March 2021 to 31 December 2022.
- PT Hazmat Techno Indonesia B3 Waste Transportation and/or B3 waste collection based on the Decree of the Director General of Land Transportation No. SK.00107/AJ.309/I/DJPD/2018 dated May 9, 2018 is valid for 5 years and the Approval Letter from the Investment Service and One Stop Integrated Licensing Service Number 660/1798.
- PT Pengolahan Limbah Industri Bekasi B3 waste management services based on the Decree of the Minister of LHK RI No. S.31/Menlhk/Setjen/PLB.3/1/2019 dated January 21, 2019.
- SPK for Transport and Management of LB3 between PT Inti Indosawitt
 Subur and PT Hazmat Techno Indonesia and PT Putra Restu Abadi

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No. 07/SPJ/LEG-IIS/III/21 dated 26 March 2021. The agreement period starts from 26 March 2021 to 31 December 2022.

- PT Hazmat Techno Indonesia B3 Waste Transportation and/or B3 waste collection based on the Decree of the Director General of Land Transportation No. SK.00107/AJ.309/I/DJPD/2018 dated May 9, 2018 is valid for 5 years and the Approval Letter from the Investment Service and One Stop Integrated Licensing Service Number 660/1798.
- PT Putra Restu Abadi B3 waste management services based on the Decree of the Minister of LHK RI No. S.575/Menlhk/Setjen/PLB.3/8/2020 dated 31 August 2020.

LB3 manifest for transport on March 18, 2022

Festronik Number KLHK-1650477714 - Clinical waste

Festronik Number KLHK-1651711731 - Waste lamp TL

Festronik Number KLHK-1650479273 - Used Oil Waste

Festronik Number KLHK-1650479986 – B3 used packaging waste

LB3 manifest for transport on March 30, 2022

Festronik Number. KLHK-1650480788 – Waste filter used

Festronik Number KLHK-1650479910 – Used Oil Waste

Festronik Number KLHK-1650481097 – B3 used packaging waste

Festronik Number KLHK-1651575806 – Waste of used cloth rags

Records of Quarterly report of hazardous waste were seen and reviewed for Triwulan III- IV Y2021 and Triwulan I Y2022.

		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.	
7.3.3	The unit of certification does not use open fire for waste disposal.	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 2021-2022 untuk Karyawan Soga Estate and Sei Lala Estate". Regulation of domestic waste management refer to "UU No. 18 Tahun 2008 tentang Pengelolaan Sampah". Group Manager of Plasma Ukui 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. Based on field observation in Soga Estate and Sei Lala Estate, it was found no use of open fire for waste disposal.	Complied
Criteria	7.4: Practices maintain soil fertility at, or where possible improve soil fer	tility 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	Soga & Sei Lala Estate: Both own estate and smallholder has had the procedure related to	Complied
	impacts is documented.	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.	

		Scheme Smallholder: Based on interview with plasma manager obtain information that the fertilizer recommendation set by Asian Agri's Research and Development Department. No fertilizer applied in riparian area to minimize environmental impact.	
7.4.2	Analysis of tissue samples (e.g. leaves) and soil on a regular basis to monitor and manage changes in soil fertility and plant health is documented.	 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: The last soil sampling conducted in June 2016. Parameter that tested is N, C, K, Ca, Mg and pH. 	Complied
		 The last leaf sampling conducted in April 2021. Parameter that tested is major element (Ash, N, P, K Mg, Ca) dan Minor element (B, Cu, Zn, Mn, Fe). 	
		Those reports are converted to be fertilizer recommendation by Asian Agri's Research and Development Department.	
7.4.3	A nutrient recycling strategy is in place, which include the recycling of	Soga & Sei Lala Estate:	Complied
	Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.	According to the Agricultural Policy Manual, certificate holder has had a guidance in organic fertilizers such as Empty Fruit Bunch (EFB) and Palm Oil Mill Effluent (POME). Certificate holder has implemented EFB application in estate with dosage 30 – 50 ton/Ha in normal soil and POME with dosage 750 m3/Ha only Sei Lala Estate which is near the Ukui II mill.	·
		During this visit, auditor has observed the application of organic and inorganic fertilizers. For example: there is application of HGFB fertilizer with dosage 7.5 gr/palm in Sei Lala Estate and application of EFB in block A89e Afdeling 1 Soga Estate. Both applications have followed the recommendation stipulated by Asian Agri Research and Development Department.	

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EFB and POME application in 2021 and 2022 (until April):				
2021				
Month	POME (m ³)	EFB (MT)		

Month	POME (m ³)	EFB (MT)
January	16,866	719
February	15,388	903
March	13,681	900
April	19,915	577
May	19,356	998
June	17,147	969
July	16,240	861
August	15,367	807
September	15,272	400
October	14,925	443
November	14,925	672
December	13,840	773
Total	194,996	9,022

2022

Month	POME (m ³)	EFB (MT)
January	13,385	328

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February	10,500	446
March	13,908	360
April	14,214	343
Total	55,210	1,477

PT IIS Ukui II POM has a permit of Land Application as per "Keputusan Kepala Dinas Penanaman Modal dan Pelayanan terpadu Satu Pintu Kabupaten Pelalawan Nomor: 503/DPMPTSP-LA/2019/07 dated 26 August 2019 (valid until 5 years), regarding Izin Pemanfaatan Air Limbah (Land Application) PT Inti Indosawit Subur – Ukui II POM, location Bagan Limau Village, Ukui Sub District, Pelalawan Disctrict, Riau Propince. Land Application area is 630 ha at Sei Lala Estate (Blok C90b, C91b, C89c, C89d, B89c, and B89d).

Scheme Smallholder:

According to the interview with smallholder representatives, there is no longer EFB application at this time since their area include in replanting plan on 2021.

According to the interview with smallholder representatives, only KUD Bukit Potalo that still applied the fertilizer according to fertilizer recommendations for their whole areas. Whilst the KUD Tani Subur, KUD Karya Tani and KUD Mekar Abadi. was not applied the fertilizer for their whole areas due to replanting plan in the next two year.

Records of fertilizer inputs are maintained. The result of leaf sampling analysis, soil sampling analysis along wisual analysis, planting material, planting age and rain fall are consider in proposing the Fertilizer Recommendation.					
	Fertilizer Recommendation	on and realization	for year 2022:		
	Fertilizer	Recommend ation (Kg)	Realization (Kg)	%	
	Ammonium Chloride- NH4Cl	836,903	339,638	41	
	MOP	718,947	125,614	17	
	RP	310,396	0	-100	
	Dolomite	339,995	339,998	100	
	HGF-Borate	6,107	-	-100	
	Fertilizer Recommendation Fertilizer	Recommend ation (Kg)	Realization (Kg)	%	
	Ammonium Chloride- NH4Cl	597,601	597,601	100	
	MOP	246,022	246,030	100	
	RP	149,097	149,097	100	
	Dolomite	182,119	182,119	100	
	HGF-Borate	9,252	9,251	100	

Criteria 7.5: Practices minimise and control erosion and degradation of soils.				
7.5.1	(C) Maps that identify marginal and fragile soils, including steep sloped	Own Estates	Complied	
	land are available.	Asian Agri's Research and Development Department has conducted soil survey semi detail in PT Inti Indosawit Subur (Soga Estate and Sei Lala Estate) on 2010. Based on the report found the soil taxonomy refer to USDA 2006 as follows:		
		Typic Dystrudepts (72.1% from the total area)		
		Typic Endoaquepts (24.5% from the total area)		
		• Typic Placaquods (2.5% from the total area)		
		Typic Haplosaprist (0.9% from the total area)		
		Topography:		
		• Flat – undulating $(0 - 8\%) \rightarrow 15.15\%$ from the total area		
		• Rolling $(8 - 15\%) \rightarrow 36.29\%$ from the total area		
		• Rolling - Hilly $(15 - 30\%) \rightarrow 45.68\%$ from the total area		
		• Steep (>30%) \rightarrow 2.88% from the total area		
		Based on field visit in Estates sighted ground management in steep area as follows:		
		Terracing in contour area.		
		Frond stacking alongside the contour.		
		No chemical in <i>Neprolephis bisserata</i> .		
		EFB application.		
		Scheme Smallholder:		
		Asian Agri's Research and Development Department has conducted soil survey semi detail in Smallholder Area of PT Inti Indosawit Subur on 2010.		

7.5.2	The replanting of palm oil is not conducted extensively on steep terrain in accordance with applicable regulations.	extensive replanting activity in steep terrain both own estate and	Complied
7.5.3	New palm oil planting is not conducted on steep terrain in accordance with applicable regulations.	smallholder area. There is no new palm oil planting in Sei Lala and Soga Estate.	Complied
Criteria operation		g in the establishment of new plantings, and the results are incorporated	into plans and
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.	Certificate holder through Agri Agri's Research and Development Department has conducted soil mapping 2010. They also had SOP AA-APM-OP-1100.05-R3 dated 23 November 2016: <i>Konservasi Tanah dan Air</i> (Soil & Water Conservation) as guidance for soil conservation in each topography During this audit, auditor has been confirmed that there is no new planting (land extension) of PT Inti Indosawit Subur or plasma area. It is only replanting activity that conducted in 2017.	Complied

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Extensive planting on marginal and fragile soils is avoided or, if	During this audit, auditor has been confirmed that there is no new planting	C 1: 1
necessary, carried out according to the best-practice soil management plan.	(land extension) of PT Inti Indosawit Subur or plasma area. It is only replanting activity that conducted in 2017. Replanting activity in steep area using a terrace contour for soil conservation.	Complied
Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	During this audit, auditor has been confirmed that there is no new planting (land extension) of PT Inti Indosawit Subur or plasma area. It is only replanting activity that conducted in 2017. Replanting activity in steep area using a terrace contour for soil conservation.	Complied
7.7: No new planting on peat, regardless of depth after 15 November 20	18 and all peatlands are managed responsibly.	
(C) No new planting on peatlands, regardless of depth, after 15 November 2018, in existing plantation areas, as well as in new development areas.	According to soil map semi detail scale 1:25,000 and also verified during field visit, confirmed that there is no peat soil at area Soga Estate, Sei Lala Estate and Ukui Plasma. There are 4 types of soil in Soga & Sei Lala Estate and Plasma Ukui area, namely: 1. Typic Dystrudepts 2. Typic Endoaquepts 3. Typic Haplosaprists 4. Typic Placaquods Therefore, this indicator is not applicable.	Not Applicable
Peat areas within the managed area are inventoried, documented and reported to the RSPO Secretariat (effective from November 15, 2018).	According to soil map semi detail scale 1:25,000 and also verified during field visit, confirmed that there is no peat soil at area Soga Estate, Sei Lala Estate and Ukui Plasma. Therefore, this indicator is not applicable.	Not Applicable
DURAL NOTE: Maps and other documentation for peatlands are provided udit guide (See Procedural Notes for Indicator 7.7.5 below).	d, prepared and shared according to the RSPO Working Group (Peatland W	orking Group /
(C) Subsidence of peat is monitored, documented and minimised.	According to soil map semi detail scale 1:25,000 and also verified during field visit, confirmed that there is no peat soil at area Soga Estate, Sei Lala Estate and Ukui Plasma.	Not Applicable
	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. 7.7: No new planting on peat, regardless of depth after 15 November 20 (C) No new planting on peatlands, regardless of depth, after 15 November 2018, in existing plantation areas, as well as in new development areas. Peat areas within the managed area are inventoried, documented and reported to the RSPO Secretariat (effective from November 15, 2018). URAL NOTE: Maps and other documentation for peatlands are provided addit guide (See Procedural Notes for Indicator 7.7.5 below).	using a terrace contour for soil conservation. Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. During this audit, auditor has been confirmed that there is no new planting (land extension) of PT Inti Indosawit Subur or plasma area. It is only replanting activity that conducted in 2017. Replanting activity in steep area using a terrace contour for soil conservation. 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly. (C) No new planting on peatlands, regardless of depth, after 15 November 2018, in existing plantation areas, as well as in new development areas. According to soil map semi detail scale 1:25,000 and also verified during field visit, confirmed that there is no peat soil at area Soga Estate, Sei Lala Estate and Ukui Plasma. There are 4 types of soil in Soga & Sei Lala Estate and Plasma Ukui area, namely: 1. Typic Dystrudepts 2. Typic Endoaquepts 3. Typic Haplosaprists 4. Typic Placaquods Therefore, this indicator is not applicable. Peat areas within the managed area are inventoried, documented and reported to the RSPO Secretariat (effective from November 15, 2018). Peat areas within the managed area are inventoried, documented and reported to the RSPO Secretariat (effective from November 15, 2018). Therefore, this indicator is not applicable. According to soil map semi detail scale 1:25,000 and also verified during field visit, confirmed that there is no peat soil at area Soga Estate, Sei Lala Estate and Ukui Plasma. Therefore, this indicator is not applicable. According to soil map semi detail scale 1:25,000 and also verified during field visit, confirmed that there is no peat soil at area Soga Estate, Sei Lala Estate and Ukui Plasma. Therefore, this indicator is not applicable. According to soil map semi detail scale 1:25,000 and also verified during field visit, confirmed that there is no peat soil at area Soga Estate, Sei Lala Plasma.

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		Therefore, this indicator is not applicable.	
7.7.4	(C) Availability of implementation evidence of the water and land cover management program.	According to soil map semi detail scale 1:25,000 and also verified during field visit, confirmed that there is no peat soil at area Soga Estate, Sei Lala Estate and Ukui Plasma. Therefore, this indicator is not applicable.	Not Applicable
7.7.5	(C) 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.	According to soil map semi detail scale 1:25,000 and also verified during field visit, confirmed that there is no peat soil at area Soga Estate, Sei Lala Estate and Ukui Plasma. Therefore, this indicator is not applicable.	Not Applicable
Guidelines January 2 communit managem refined as	PROCEDURAL NOTE: For 7.7.5: Detailed information on the RSPO Drainability Assessment Guide along with related concepts and detailed actions is configuidelines currently being adjusted / tested by the RSPO Working Group on Peatlands (Peatland Working Group / PLWG). The final version must obtain PLWG January 2019 and will include additional Guide on the steps to be followed after deciding not to replant and the consequences for other stakeholders, for communities, and the unit of certification concerned. It is recommended that the trial methodology period is proposed to be extended for 12 months for management units (ie management units that have plantations on peat) to utilize the methodology and provide input to PLWG so that existing procedures carefined as needed before January 2020. The unit of certification has the option to delay replanting until the issuance of the revised Guidelines for the guideline guidance for alternative commodity crops and rehabilitation of natural vegetation will be regulated by the PLWG.		
7.7.6	(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).	According to soil map semi detail scale 1:25,000 and also verified during field visit, confirmed that there is no peat soil at area Soga Estate, Sei Lala Estate and Ukui Plasma. Therefore, this indicator is not applicable.	Complied



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.	According to soil map semi detail scale 1:25,000 and also verified during field visit, confirmed that there is no peat soil at area Soga Estate, Sei Lala Estate and Ukui Plasma. Therefore, this indicator is not applicable.	Complied
Criteria	7.8: Practices maintain the quality and availability of surface and ground	water.	
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 - Ukui Group has prepared the plan of water management plan as in "Program Manajemen Lingkungan 2021 – 2022" 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 second semester year 2020 shown that water quality is complies with national regulation. 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" PT Inti Indosawit Subur – Ukui II POM has establish management plan to protect water courses and wetlands, including securing and maintaining appropriate riparian. - Riparian restoration with forest vegetation plant/tree.	Complied

	the water need, permit and licensing, monitoring of water quality, infrastructure maintenance and conservation 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
7.8.1b Workers have adequate access to clean water.	PT Inti Indosawit Subur - Ukui II POM has prepared the plan of water management plan as in "Program Manajemen Lingkungan 2021-2022" consist of management water supply for domestic, water consumption and measurement of water quality. Water Management Plan, indicating
	Ukui II POM also paid the water retribution each month to "UPT Pengelolaan Pendapatan, Badan Pendapatan daerah Pemerintah Provinsi Riau". Sample: SPPD (Surat Setoran Pajak Daerah) untuk Pajak Pengambilan dan Pemanfaatan Air Permukaan untuk period January – March 2022.
	Ukui 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 Indosawit Subur untuk Usaha Industri di Sungai Laniago, Kabupaten Pelalawan dan Kabupaten Siak", dated 5 th January 2018.
	- Restricted to conduct replanting palm oil in riparian area. PT Inti Indosawit Subur – Ukui 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.
	- Conserve natural vegetation in riparian zone
	- Establish zone for zero chemical. No spraying and fertilizing along riparian zone. Based on visit in riparian zone (Sempadan Sungai Laniago) in block BA90

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		treatment), location in Ukui II POM shown comply to PERMENKES NO 492/MENKES/PER/IV/2010	
7.8.2	(C) Water courses and wetlands are protected, including the maintenance and restoration of riparian zones and other buffer zones during or before replanting, in accordance with the "RSPO Manual on BMPs for the management and rehabilitation of riparian reserves" (April 2017) or Simplified Guide Management and Rehabilitation of Riparian Reserves (2018).	PT Inti Indosawit Subur – Ukui II POM has establish management plan to protect water courses and wetlands, including securing and maintaining appropriate riparian. - Riparian restoration with forest vegetation plant/tree. - Establish zone for zero chemical. No spraying and fertilizing along riparian zone. Based on visit in riparian zone (Sempadan Sungai Laniago) in block BA90 - Conserve natural vegetation in riparian zone - Restricted to conduct replanting palm oil in riparian area	Complied
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.	Ukui II POM: There were 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. Ukui II POM is undergoing Biogas power plant construction since April 2015 to generate electrical power by using waste water treatment. The biogas system has Anaerobic MBR system through digester Thermophilic fermentation, and anaerobic membrane tank.	Complied
		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/780/2014, issued on 10th September 2014 valid for 5 years. Total area of land application covers 679 hectares at Block B and C. As required by LA permit, Mill conducts monthly check on discharged effluent in cooperation with accredited Laboratory (UPT Pengujian	

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		result, BOD le KepmenLH No application. T debit <600 m Based on resu	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 2021 and also January – April 2022 shown comply with legal requirement "PermenLHK No		
			Cum1/8/2016".	legal requirement remembries no	
7.8.4	Mill water use per tonne of FFB is monitored and recorded.	monitoring of of water usag	Ukui II POM has recorded the mill water use per ton FFB, includes monitoring of water usage for mill processing and domestic usage. Result of water usage monitoring is recorded under "Mill Operation Summary" year 2021, updated in December 2021.		Complied
		Month	Water use (M³)]	
		January	20,449	1	
		February	15,958		
		March	19,024		
		April	22,025		
		May	21,118		
		June	19,920		
		July	20,971	-	
		August	23,642	-	
		September October	22,539 19,160	1	
		November	15,176	1	
		December	13,107	1	
			1,,		
Criteria 7	7.9: Efficiency of fossil fuel use and the use of renewable energy is opting	nised			
7.9.1	Plans to increase the efficiency of fossil fuel use and to optimize renewable energy are available, monitored and documented			POM has prepared the program for ssil fuels and to optimize renewable	Complied

		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	
		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.	
		Scheme Smallholders:	
		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 3 January 2022. The source of energy was identified e.g.: water, fuels, gas and electrical.	
	7.10: Plans to reduce pollution and emissions, including greenhouse gase se GHG emissions.	es (GHG), are developed, implemented and monitored and new development	s are designed
7.10.1	(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	PT Inti Indosawit Subur – Ukui II POM has identified the emission sources and pollution under document of "Environmental Aspect-Impacts (Evaluasi Aspek-Dampak Lingkungan) year 2021-2022".	Complied
	reported publicly.	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	
		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	

		measurement of exhaust emissions each semester to ensure air quality is comply with standard regulation. Scheme Smallholder: Manager of Kebun Plasma Ukui Group has prepared the list significant pollutants and identify sources of emissions, presented in "Identifikasi Sumber Polusi di Perkebunan Petani Kebun Plasma Ukui Group PT Inti Indosawit Subur" updated on 3 January 2022. List of significant pollutant such as emission 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 – Sei Lala and Soga Estate and 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.	Complied	
7.10.3	(C) Other significant pollutant identification results are available and plans to reduce or minimize them are implemented and monitored.	PT Inti Indosawti Subur – Ukui II POM has identified the significant pollutants and greenhouse gas (GHG) emissions. Significant pollutants and GHG such as: Emission, particulate, noise from boiler and generator, effluent from mill wastewater, fertilizer application, chemical applicator and transport of FFB. 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.	Complied	
Criteria 2	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 – Ukui II POM 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,	Complied	

		ignition risk, potential drought and smoke, fire handling, firefighting difficulty and weather index. Patrol report indicating any fire incident.	
		Based on field visit in block Sei Lala 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 company and subcontractor that all activity of replanting is performed manual and mechanically.	
		Scheme Smallholder:	
		There was no any open burning was noted for land preparation and any activity in Usaha Tani, Karya Tani, Tani Bahagia. Replanting plan has been drawn up in the near future. The replanting plan was available under "S Pelaksanaan Replanting Kebun Plasma Ukui Group".	
		During field visit in Usaha Tani, Karya Tani, Tani Bahagia, there was a replanting and no burning activity. The land preparation is using mechanical method.	
7.11.2	The unit of certification establishes fire prevention and control measures for lands that are directly managed by the unit of certification.	There is no new planting within certified area of PT Inti Indosawit Subur – Ukui Group and Ukui 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.	Complied
		Replanting has been done mechanically, consist of: falling tree, chipping by excavator, terracing by excavator, digging, road construction, ditch/waterways construction, planting LCC and planting oil palm. Company has established "Ketentuan Replanting areal Mineral" in 2016. In the mechanism explained that replanting must be conducted mechanically without burning.	
		Based on field visit in block Sei Lala 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 company	

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		and subcontractor that all activity of replanting is performed manual and mechanically. Scheme Smallholder:	
		There was no any open burning was noted for land preparation and any activity in Usaha Tani, Karya Tani, Tani Bahagia. Replanting plan has been drawn up in the near future. The replanting plan was available under "S Pelaksanaan Replanting Kebun Plasma Ukui Group".	
		During field visit in Usaha Tani, Karya Tani, Tani Bahagia, there was a replanting and no burning activity. The land preparation is using mechanical method.	
7.11.3	The unit of certification engages stakeholders in adjacent locations for fire prevention and control measures.	The policy has communicated to all smallholder remember and local community to engages stakeholders in adjacent locations for fire prevention and control measures.	Complied
		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.	

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

PROCEDURAL NOTE for 7.12:

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

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



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

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

The development of this procedure will be guided by the No Deforestation Joint Steering Group (NDJSG) between the RSPO and HCSA members. In HFCC

countries, RSPO will work with governments, communities and other stakeholders to develop this procedure through participatory processes at national and regional levels. The duration of this activity is specified in the Terms of Reference for NDJSG and is publicly available.

	, · · ·				
7.12.1	(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. 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).	November 2005. The planting year started in 1987, 1988, 1989, and the	Not Applicable		
7.12.2	(C) HCV and HCS forests, and other conservation areas are identified as follows: 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.	PT Inti Indosawit Subur – Ukui Group is in cooperation with Faculty of Forestry, Bogor Agriculture University in preparing HCV Identification "Dokumen Identifikasi dan Analisis Keberadaan Nilai Konservasi Tinggi (NKT) di Areal Perkebunan Kelapa Sawit di Kebun Ukui dan Soga pada tahun 2010". Guidance use is HCV Toolkit 2008. The document has put into consideration the landscape condition, including Teso Nilo National Park near the plantation. HCV assessment was including plasma/scheme smallholder area. The assessment team comprise of Ir. Nyoto Santoso, MS as lead assessor HCV RN registered lead assessor, Ir.Heru B Pulunggono, MSc (hydrology	Complied		
		and soil conservation), Handian Purwawangsa, S.Hut, MSI, (social), Iing Nasihin S.Hut, MSi (flora and GIS), Tutut Sunarminto, MSi, (social and cultural), Yanti Apriyanti, S.Pi (social and cultural), Rizki Ratna Ayu Paramita Sari, S.Hut (social and cultural). The HCV assessment identified the presence of HCV 1.1, HCV 1.2, HCV 1.3, HCV 2.3, HCV 4.1 and HCV 6			

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with total (under PT Inti Indosawit Subur – Ukui Group/Sei Lala Estate and Soga Estate) of 234.458 Ha.

HCV in Soga & Sei Lala Estate

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

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		Most of the HCV identified, local Company maintain the riparian areal plantation area: Mammals such as "Kancil" (Tragulus javanicus), "Kijang (Manis javanica), Monkey (Macanemestrina), "Musang" (Paradoxu "Raja udang meninting" (Alcedo masiparaja and Nectarinia jugularis), "Eular bido" (Spilomis cheela), "Ceka" Kipasan belang" (Rhipidura java (Phyton molurus), Biawak (Varanuplants such as "Meranti batu" (Shorateysmanniana). HCV assessment performed stakeholders/public consultation. Treviewed by WWF on 10/25/2010 -	a. A number of fauna is "Kucing kuwuk" (Felig" (Muntiacus muntja aca fascicularis), "Burus hermaphroditus). eninting), "Burung ma Elang tikus" (Elanus ca akak belukar" (Halicy inica). Reptile such aus salvator). Identified ea leprosula), "Meranti in consultation the HCV identification in	identified in the lis bengalensis), ak), "Trenggiling" beruk" (Macaca Birds such as du" (Aethopyga eruleus), "Elang on smymensis), as "Ular Piton" I also protected bunga" (Shorea with relevant	
	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.	PT Inti Indosawit Subur – Ukui Gro (including smallholder) did not November 2005. The planting year company has starts replanting in 20 Therefore, the requirement of this i	carry out any new started in 1987, 1988 015 – present.	plantings after 1, 1989, and the	
7.12.3	(C) In High Forest Cover Landscapes (HFCLs) within HFCCs, a specific procedure will apply for legacy cases and development by indigenous peoples and local communities with legal or customary rights, taking into consideration regional and national multi-stakeholder processes. Until this procedure is developed and endorsed, 7.12.2 applies.	Based on HCV assessment report there is no High Forest Cover Land Indosawit Subur Sei Lala Estate and PT Inti Indosawit Subur Sei Lala E another purpose area and not in fo	scapes (HFCLs) within d Soga Estate. state and Soga Estate	area of PT Inti	Not Applicable



		This indicator not applicable.	
PROCED	DURAL NOTE for 7.12.3:		
Indicator	7.12.3. is not relevant to Indonesia, until further decisions by the RSPO.		
7.12.4	(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An Integrated management plans to protect and/or enhance HCV and HCS forests, peatland and other conservation areas are developed, implemented and adapted if necessary, and contains 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).	PT Inti Indosawit Subur – Ukui Group Certification unit and supply bases (including smallholder) did not carry out any new plantings after November 2005. The planting year started in 1987, 1988, 1989, and the company has starts replanting in 2015 – present. Therefore, the requirement of this indicator is not applicable. According to HCV assessment 2010, there is no High Forest Cover Landscapes (HFCLs) identified. Most of the HCV identified, located within the existing plantation. Conservation management plan Soga & Sei Lala Estate update on January 2021, consist of: • Area demarcation and maintenance the boundary markers • Socialization of HCV area and protection to employee and surrounding community • Riparian restoration • Prohibiting chemical application in riparian zone/river border Evidence Continuous monitoring documentation and report regarding the status of RTE species and HCV presented in "Laporan Monitoring tumbuhan dan Satwaliar PT Inti Indosawit Subur – Kebun Ukui, Soga & Sei Lala" Period January – June 2021 and July – December 2021". 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 disturbance, and HCV condition. Latest monitoring both RTE species and HCV area conducted	Complied



on April 2022. Sample seen: Wildlife monitoring in Sei Lala Estate Block B89c, C91b, C90d, C90b, D90c period April 2022, found presence of animal such as: *Phyton sp, Sus crofa, Halcyon smyrnensis, Macaca fascicularis, Tupaia tana*. Monthly monitoring of HCV area condition and animal species also performed by Foreman HCV (Presedia Sinaga) and each Foreman Afdeling, animal presence recorded in "Daftar Temuan Satwa Liar; Wildlife monitoring in Soga Estate Block A98a-c, A96a-c period April 2022, found presence of animal such as: *Naja sumatrana, Felis bengalensis, Sus crofa, Halcyon smyrnensis, Macaca fascicularis, Tyto alba.* Monthly monitoring of HCV area condition and animal species also performed by Foreman HCV (Rico siregar) and each Foreman Afdeling, animal presence recorded in "Daftar Temuan Satwa Liar.

Socialisation and awareness to employee regarding HCV has been conducted regularly through master morning, sample seen on 1 January 2022, 2 February 2022, 7 March 2022, 8 April 2022 in Sei Lala Estate, 9 March 2022 in Soga Estate.

Scheme Smallholder:

Conservation management plan Plasma ukui (Scheme Smallholder) update on 2 January 2021, consist of:

- 1. Biodiversity monitoring
- 2. Signboard maintenance
- 3. Socialization of HCV area
- 4. Riparian protection
- 5. Prohibiting chemical application in riparian zone/river border

Each KUD has appointed person in charge to monitor the RTE species presence in smallholder plantation area:

- KUD Mekar Abadi: Surat Keputusan Pengurus KUD Mekar Abadi Nomor: 037/KUD-MA/SK/TJ/I/2021 dated 4 January 2021 Tentang

bsi.

		Penunjukan/Pengangkatan Pengurus HCV dan Perlindungan Satwa Liar KUD Mekar Abadi. apointed person: Sutrisno. KUD Tani Subur: Surat Keputusan Pengurus KUD Tani Subur Nomor: 01/KUD-TS/SK/SBH/I/2021 dated 4 January 2021 Tentang Penunjukan/Pengangkatan Pengurus HCV dan Perlindungan Satwa Liar KUD Tani Subur. apointed person: Puji Santoso. KUD Karya Tani: Surat Keputusan Pengurus KUD Karya Tani Nomor: 02/KUD-KT/SK/SBB/I/2021 dated 4 January 2021 Tentang Penunjukan/Pengangkatan Pengurus HCV dan Perlindungan Satwa Liar KUD Karya Tani. apointed person: Herman. HCV training and socialization to smallholder member has been conducted on 11 August 2020 to all smallholder group and KUD. Minutes of socialization and attendance list are available. Monitoring for RTE species performed each month by PIC. Result of monitoring presented in "Formulir Daftar Temuan Satwa Liar Tahun 2021/2022". During January – December 2021, shown that in KUD Tani Subur, KUD Mekar Abadi and KUD Karya Tani there were presence of animal such as: Beruk (<i>Macaca nemestrina</i>), Tupai (<i>Tupaia glis</i>), Musang (<i>Paradoxurus hermaproditus</i>) Ular kobra (<i>Naja sumatrana</i>), Kucing hutan (<i>Prionailurus bengalensis</i>), Biawak (<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.	PT Inti Indosawit Subur – Ukui Group Certification unit and supply bases (including smallholder) did not carry out any new plantings after November 2018. The planting year started in 1987, 1988, 1989, and the company has starts replanting in 2015 – present. Therefore, the requirement of this indicator is not applicable.	Not Applicable
7.12.6	All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme	Soga and Sei Lala Estate:	Complied



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.

A number of fauna identified in the plantation area: Mammals such as "Kucing kuwuk" (Felis bengalensis), "Kancil" (Tragulus javanicus), "Kijang" (Muntiacus muntjak), "Trenggiling" (Manis javanica), Monkey (Macaca fascicularis), "Beruk" (Macaca nemestrina), "Musang" (Paradoxurus hermaphroditus). Birds such as "Raja udang meninting" (Alcedo meninting), "Burung madu" (Aethopyga siparaja and Nectarinia jugularis), "Elang tikus" (Elanus caeruleus), "Elang ular bido" (Spilomis cheela), "Cekakak belukar" (Halicyon smymensis), "Kipasan belang" (Rhipidura javanica). Reptile such as "Ular Piton" (Phyton molurus), Biawak (Varanus salvator).

Identified also protected plants such as "Meranti batu" (Shorea leprosula), "Meranti bunga" (Shorea teysmanniana).

Company has prepared a procedure for protection of flora and fauna, explained in Environmental Management System: Biodiversity (AA-432-002e-LT), IUCN Red List (AA-432-006-LT), CITES list (AA-432-07-LT).

Estate has established the management plan to maintain and/or enhance High conservation value area. HCV management and monitoring plan described measures taken for each HCV and its monitoring. Relevant laws were taken into account for determining appropriate measure including UU #5/1990 about Natural resources conservation, PP#7/1999 about List of protected plan and wildlife, Kepres #32/1990, and PP #26/2008. Conservation management plan consist of :

- HCV area demarcation
- Socialization of HCV area and protection to employee and surrounding community
- Riparian restoration
- Prohibiting chemical application in riparian zone and its monitoring

Signboards are placed on the area identified with conservation values. Monitoring for the HCVs are carried out as per Conservation Management Plan. The conservation management plan covers area enhancement,



socialization to workers and local communities, prohibition of chemical regime near the area and river buffer zone' restoration. Plan for monitoring and patrol has been incorporated into the management and monitoring plan. Another effort planned was to have HCV sign board and "no-hunting" sign boards placed near identified HCV areas — on progress.

PT Inti Indosawit Subur – Ukui Group is also having procedure to monitor the protected/conservation area as per "SOP Pemantauan Areal Lindung" No.AA-PL-08-EFP – describing procedure for vegetation monitoring, wildlife monitoring (path and rapid method), conservation area inspection procedure, vegetation enhancement procedure and data analysis procedure.

Interview and document verification of "Laporan Monitoring Pengelolaan Tumbuhan dan Satwa Nilai Konservasi Tinggi" of PT Inti Indosawit Subur – Kebun Ukui period semester I & II year 2021 can be demonstrate that the measures contained in the management plan been actively implemented.

Company continuously disseminating HCV and wildlife protection to employee and surrounding community. Socialisation and awareness to employee regarding HCV has been conducted regularly through master morning, sample seen on 1 January 2022, 2 February 2022, 7 March 2022, 8 April 2022 in Sei Lala Estate, 9 March 2022 in Soga Estate.

Ukui Smallholder:

The management of Ukui Smallholder has develop the Conservation Management Plan 2022, updated on 2 January 2022 consist of:

- HCV area demarcation and maintenance the boundary markers
- Socialization of HCV area and protection to employee and surrounding community
- Riparian restoration

bsi.

		- Prohibiting chemical application in riparian zone/river border.	
		Ukui Smallholder Manager has defined the SOP for individual members to report on threats to HCVs and presence of RTE species in the procedure "Konflik Dengan Satwa Yang Dilindungi No. 015/DOK/SOP/PT.KLUAA/ 2016" dated 2 December 2016.	
		Each individual member shall be identified and observe the RTE species in their plots/kavling. Each member notes the presence of RTE species in their "Buku Panduan dan Catatan Petani", the report was delivered to Ukui Smallholder Manager and forward to official of "BKSDA Riau". If the RTE species was Sumateran Elephant, Smallholder Manager shall coordinated with BKSDA Riau and WWF Flying Squad to handle and prevent the conflict between human and animal. Since latest audit until this audit there is no presence of Sumateran Elephant.	
		Regular monitoring of RTE species has been conducted by Plasma Ukui. Latest monitoring of RTE species and HCV monitoring of PT Inti Indosawit Subur – Ukui Group (including plasma) has been reported in "Daftar Temuan Satwa Liar". During January – December 2021 and January – April 2022, shown that in KUD Tani Subur, KUD Mekar Abadi and KUD Karya Tani there were presence of animal such as: Beruk (<i>Macaca nemestrina</i>), Tupai (<i>Tupaia glis</i>), Musang (<i>Paradoxurus hermaproditus</i>) Ular kobra (<i>Naja sumatrana</i>), Kucing hutan (<i>Prionailurus bengalensis</i>), Biawak (<i>Varanus salvator</i>), Elang Tikus (<i>Elanus caeruleus</i>), Burung Madu (<i>Nectarinia jugularis</i>) and Cekakak Belukar (<i>Halcyon smyrnensis</i>). Ukui Plasma management continuously disseminating HCV and wildlife protection to smallholder member and surrounding community. Sample seen on socialization on 11 September 2021 at Basecamp Central Ukui.	
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.	HCV and wildlife/animal monitoring continuously conducted in a regular basis. Secondary monitoring conducted each month and primary monitoring conducted twice a year.	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.	socio-cultural services gives feedback advice and recommendations to the management plan. PT Inti Indosawit Subur – Ukui Group Certification unit and supply bases (including smallholder) did not carry out any new plantings after November 2018. The planting year started in 1987, 1988, 1989, and the company has starts replanting in 2015 – present. Therefore, the requirement of this indicator is not applicable.	Not Applicable
		chloris); 6 species of Herpetofauna such as Biawak (varanus salvator), Kodok buduk (Bufo asper). Result of monitoring gives the feedback into the management plan improvement. The results from monitoring of wildlife, environmental, and	
		Report of Management and Monitoring for HCV and RTEs is reported every 6 months and review is conducted regularly to ensure that monitoring is effective. Reports period semester I & II year 2021 can be demonstrated. Results of monitoring was evaluated using trend evaluation. Monitoring RTE species in January – December 2021 observed type of mammal and two species was protected by law such as Macan akar (Felis bengalensis); 42 species of Aves (bird) and 7 species was protected such as Alap-alap kawah (Falco feregrinus), Burung madu kelapa (Anthreptes malaccensis), Kipasan belang (Rhipidura javanica), Cekakak sungai (Tordirhampus	
		Monitoring of animal/wildlife performed by HCV/Sustainability officer and field workers, result of monitoring presented in "laporan pemantauan Jenis satwa/tumbuhan".	





Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in 2021 for Ukui II 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 2021 for Ukui II Mill and supply base are as following:

Emission per product	tCO ₂ e/tProduct
СРО	0.50
РКО	0.50

Extraction	%
OER	20.78
KER	5.48

Production	t/yr
FFB Process	258,155
CPO Produced	53,646
PKO Produced	14,149

Land Use		На
OP Planted Area		20,462
OP Planted on peat		0.00
Conservation (forested)		0.00
Conservation (non-forested)		92.29
То	tal	20,462

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO₂e / FFB	tCO₂e	tCO₂e / FFB	tCO₂e	tCO₂e / FFB	tCO₂e	tCO₂e / FFB
Emission								
Land Conversion	59,161.01	9.88	0.42	0.00	0.00	0.00	0.00	0.00
CO ₂ Emission from fertilizer	3,016.22	0.50	0.02	1,260.49	0.09	0.01	0.00	0.00
NO ₂ Emission	3,040.40	0.51	0.02	2,025.72	0.14	0.02	0.00	0.00
Fuel Consumption	977.39	0.16	0.01	644.62	0.04	0.01	0.00	0.00
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sink								
Crop Sequestration	-56,076.78	-9.36	-0.40	0.00	0.00	0.00	0.00	0.00
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	10,118.24	1.69	0.07	3,930.84	0.27	0.03	0.00	0.00

^{*}Note: Includes both estates and smallholders



Summary of Mill Emission and Credit

	tCO ₂ e	tCO₂e/tFFB
Emission		
POME	31,219.16	0.12
Fuel Consumption	293.20	0.00
Grid Electricity Utilization	110.48	0.00
Credit		
Export of Grid Electricity	-0.00	0.00
Sales of PKS	-12,047.20	-0.05
Sales of EFB	0.00	0.00
Total	19,575.63	0.07

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO₂e
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	0.00
Total Crusher emissions	0.00

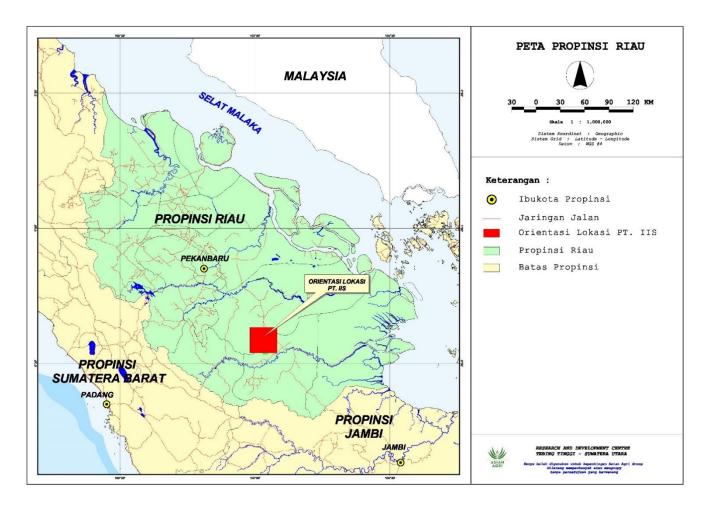
^{*}This mill has no kernel crusher operation.

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

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

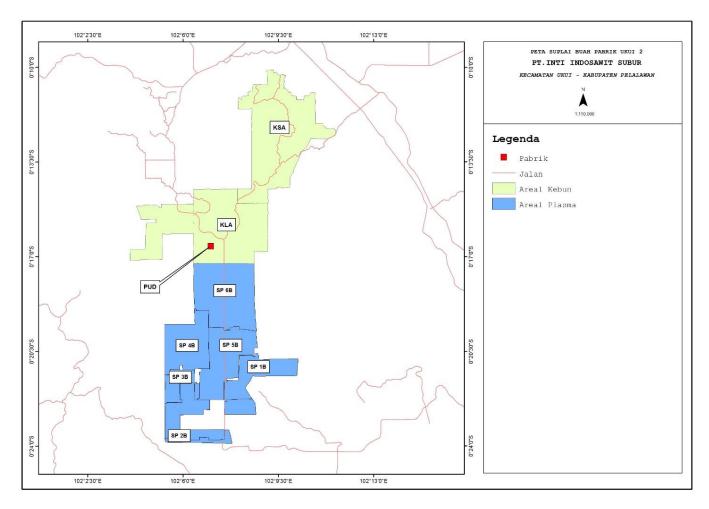


Appendix C: Location Map of Certification Unit and Supply bases





Appendix D: Estate Field Map





Appendix E: List of Smallholder Sampled

No	Name of farmer	Location	GPS Re	eference	Area Summary (Ha)		Forecasted		Smallholder
			Latitude (N)	Longitude (E)	Total Certified Area	Planted Area	annual FFB Production (MT)	joining	ID
1	Sangko Budiono	KUD Tani Subur	0° 21′ 40.5″	102° 07′ 49.4″	2	2	38	1989	4417
2	Sumadi Karyo	KUD Tani Subur	0° 21' 31.6"	102° 07' 21.3"	2	2	38	1989	4258
3	San Sukardi	KUD Tani Subur	0° 21′ 42.3″	102° 07′ 31.0″	2	2	38	1989	4445
4	Nasihin	KUD Tani Subur	0° 21′ 49.9″	102° 07′ 30.8″	2	2	38	1989	4423
5	M.Amin Bin Buyut	KUD Tani Subur	0° 21′ 43.8″	102° 07′ 52.4″	2	2	38	1989	4513
6	Ergindo	KUD Tani Subur	0° 22′ 10.6″	102° 07′ 44.5″	2	2	38	1989	4578
7	Ngadirin	KUD Tani Subur	0° 22′ 09.9″	102° 07′ 59.1″	2	2	38	1989	4506
8	Mat Isa	KUD Tani Subur	0° 22′ 09.5″	102° 08′ 05.2″	2	2	38	1989	4575
9	Suryantoro	KUD Tani Subur	0° 22′ 09.4″	102° 07′ 52.8″	2	2	38	1989	4573
10	Ahmad Sabar	KUD Tani Subur	0° 22′ 10.1″	102° 07′ 43.7″	2	2	38	1989	4276
11	Seno Warjianto	KUD Tani Subur	0° 22′ 09.4″	102° 07′ 52.8″	2	2	38	1989	4503
12	Tukijan	KUD Tani Subur	0° 22′ 09.4″	102° 07′ 52.8″	2	2	38	1989	4430
13	Kusnun	KUD Tani Subur	0° 22′ 09.4″	102° 07′ 52.8″	2	2	38	1989	4500
14	K. Warsito	KUD Tani Subur	0° 22′ 09.4″	102° 07′ 52.8″	2	2	38	1989	4435
15	Hadi Prayitno	KUD Tani Subur	0° 22′ 09.4″	102° 07′ 52.8″	2	2	38	1989	4071
16	Kasino	KUD Tani Subur	0° 22′ 09.4″	102° 07′ 52.8″	2	2	38	1989	4112
17	Sudiman	KUD Tani Subur	0° 22′ 09.4″	102° 07′ 52.8″	2	2	38	1989	4187
18	Abidin	KUD Tani Subur	0° 22′ 09.4″	102° 07′ 52.8″	2	2	38	1989	4212
19	Misran	KUD Tani Subur	0° 22′ 09.4″	102° 07′ 52.8″	2	2	38	1989	4245
20	Widodo	KUD Tani Subur	0° 22′ 09.4″	102° 07′ 52.8″	2	2	38	1989	4417
21	Agung W.	KUD Karya Tani	0° 22′ 09.4″	102° 07′ 52.8″	2	2	39	1991	5712
22	Emiatun	KUD Karya Tani	0° 22′ 50.2″	102° 05′ 31.2″	2	2	39	1991	5754
23	Gunawan S.	KUD Karya Tani	0° 22′ 50.5″	102° 05′ 30.0″	2	2	39	1991	5753
24	Ahmad Riyanto	KUD Karya Tani	0° 22′ 50.5″	102° 05′ 30.0″	2	2	39	1991	5711
25	Sururudin	KUD Karya Tani	0° 22′ 50.5″	102° 05′ 30.0″	2	2	39	1991	5757
26	Otoy Siswanto	KUD Karya Tani	0° 22′ 30.8″	102° 05′ 33.6″	2	2	39	1991	5755
27	Heri	KUD Karya Tani	0° 22′ 50.5″	102° 05′ 30.0″	2	2	39	1991	5736
27	Eka Nurhandayani	KUD Karya Tani	0° 22′ 50.5″	102° 05′ 30.0″	2	2	39	1991	5737
28	Indra Kurniawan	KUD Karya Tani	0° 22′ 50.5″	102° 05′ 30.0″	2	2	39	1991	5738
29	Ngadeni	KUD Karya Tani	0° 22′ 50.5″	102° 05′ 30.0″	2	2	39	1991	5739
30	Rusmin	KUD Karya Tani	0° 22′ 50.5″	102° 05′ 30.0″	2	2	39	1991	5767
31	San Basri	KUD Karya Tani	0° 22′ 50.5″	102° 05′ 30.0″	2	2	39	1991	5766
32	A'at Supa'at	KUD Karya Tani	0° 22′ 50.5″	102° 05′ 30.0″	2	2	39	1991	5777
33	Ali	KUD Karya Tani	0° 22′ 50.5″	102° 05′ 30.0″	2	2	39	1991	5771
34	Kusman	KUD Karya Tani	0° 22′ 50.5″	102° 05′ 30.0″	2	2	39	1991	5773
35	Heri	KUD Karya Tani	0° 22′ 28.4″	102° 06′ 18.8″	2	2	39	1991	5736
36	Ngadiyono	KUD Karya Tani	0° 22′ 20.3″	102° 06′ 25.1″	2	2	39	1991	5830
37	Yaidi	KUD Karya Tani	0° 22′ 19.0″	102° 06′ 28.8″	2	2	39	1991	5831
36	Nasip Purwanto	KUD Karya Tani	0° 22′ 19.0″	102° 06′ 28.8″	2	2	39	1991	5866



No	Name of farmer	Location	ation GPS Reference Area		Area Summary (Ha)		Forecasted		Smallholder
			Latitude (N)	Longitude (E)	Total Certified Area	Planted Area	annual FFB Production (MT)	joining	ID
37	Sofyedi	KUD Karya Tani	0° 22′ 19.0″	102° 06′ 28.8″	2	2	39	1991	5874
38	Sumanto	KUD Karya Tani	0° 22′ 19.0″	102° 06′ 28.8″	2	2	39	1991	5875
39	Zulkifli	KUD Karya Tani	0° 22′ 19.0″	102° 06′ 28.8″	2	2	39	1991	5847
40	Sujiman	KUD Karya Tani	0° 22′ 19.0″	102° 06′ 28.8″	2	2	39	1991	5843
41	Suwarjono	KUD Mekar Abadi	0° 22′ 19.0″	102° 06′ 28.8″	2	2	42	1994	5596
42	Daryono	KUD Mekar Abadi	0° 22′ 19.0″	102° 06′ 28.8″	2	2	42	1994	5597
43	Wasroh	KUD Mekar Abadi	0° 22′ 19.0″	102° 06′ 28.8″	2	2	42	1994	5599
44	Yusmada	KUD Mekar Abadi	0° 22′ 19.0″	102° 06′ 28.8″	2	2	42	1994	5604
45	Wagiman	KUD Mekar Abadi	0° 22′ 19.0″	102° 06′ 28.8″	2	2	42	1994	5632
46	Teni	KUD Mekar Abadi	0° 22′ 19.0″	102° 06′ 28.8″	2	2	42	1994	5645
47	Dursalim	KUD Mekar Abadi	0° 22′ 19.0″	102° 06′ 28.8″	2	2	42	1995	5647
48	Suparti	KUD Mekar Abadi	0° 22′ 19.0″	102° 06′ 28.8″	2	2	42	1995	5650
49	Sri Wahyuni	KUD Mekar Abadi	0° 22′ 19.0″	102° 06′ 28.8″	2	2	42	1995	5658
50	Kadam	KUD Mekar Abadi	0° 22′ 19.0″	102° 06′ 28.8″	2	2	42	1995	5651
51	Sunarko	KUD Mekar Abadi	0° 22′ 17.0″	102° 05′ 41.3″	2	2	39	1990	5667
52	Musonip	KUD Mekar Abadi	0° 22′ 17.5″	102° 05′ 31.3″	2	2	39	1990	5670
53	Afroni	KUD Mekar Abadi	0° 22′ 17.1″	102° 05′ 28.2″	2	2	39	1990	5671
54	Suharyadi	KUD Mekar Abadi	0° 22′ 17.3″	102° 05′ 24.8″	2	2	39	1990	5672
55	Wasino	KUD Mekar abadi	0° 22′ 20.9″	102° 05′ 20.6″	2	2	39	1990	5675
56	Sarno	KUD Mekar Abadi	0° 20′ 40.45″	102° 05′ 36.78″	2	2	39	1991	6360
57	Sayono	KUD Mekar Abadi	0° 20′ 45.53″	102° 05′ 36.66″	2	2	39	1991	6361
58	Sarlan	KUD Mekar Abadi	0° 20′ 40.55″	102° 05′ 36.78″	2	2	39	1991	6370
59	Anto	KUD Mekar Abadi	0° 20′ 46.41″	102° 05′ 36.79″	2	2	39	1991	6371
60	Amminudin	KUD Mekar Abadi	0° 20′ 53.32″	102° 05′ 36.85″	2	2	39	1991	6376

Note:

- KUD Tani Subur and KUD Karya Tani, location: Sei Beberas Hilir village, Lubuk Batu Jaya Sub-district, Indragiri Hulu Regency, Riau Province.
- KUD Mekar Abdi, location: Tasik Juang village, Lubuk Batu Jaya Sub- District, Indragiri Hulu Regency, Riau Province



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 – CSPKO Independent Smallholder Certified Sustainable Palm Kernel Oil

IS – CSPKE Independent Smallholder Certified Sustainable Palm Kernel Expeller

ISCC International Sustainable Carbon Certification

ISS Independent Smallholder Standard

LD50 Lethal Dose for 50 sample

MB Mass Balance

MSDS Material Safety Data Sheet

MT Metric Tonnes
OER Oil Extraction Rate

OSH Occupational Safety and Health

PK Palm Kernel
PKO Palm Kernel Oil
POM Palm Oil Mill

POME Palm Oil Mill Effluent

PPE Personal Protective Equipment
RSPO Roundtable on Sustainable Palm Oil

P&C Principles & Criteria

RTE Rare, Threatened or Endangered species SCCS Supply Chain Certification Standard

SEIA Social & Environmental Impact Assessment

SIA Social Impact Assessment SOP Standard Operating Procedure