

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

- Initial Assessment
- Annual Surveillance Assessment (2_2)
- 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 Pusat 10230, DKI Jakarta, Indonesia
Certification Unit: PT Inti Indosawit Subur – Ukui I Palm Oil Mill
Location of Certification Unit: Ukui Village, Ukui District, Pelalawan Regency, 28382 Riau Province, Indonesia
Date of Final Report: 24/09/2023

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Section 1: Scope of the Assessment

1. Company Details			
Parent Company	PT. Inti Indosawit Subur		
RSPO Membership Number	1-0022-06-000-00	Membership Approval Date	6 th February 2006
Address	Jl Palembang Kav. 35 – 37, Jakarta Pusat 10230, DKI Jakarta, Indonesia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	PT Inti Indosawit Subur – Ukui I Palm Oil Mill		
Location / Address	Ukui Village, Ukui District, Pelalawan Regency, 28382 Riau Province, Indonesia		
Website	www.asianagri.com		
Management Representative	Ivan Novrizaldie	E-mail	Ivan_Novrizaldie@asianagri.com
Telephone	+62 21-2301119	Facsimile	+62 21-2301120

2. Certification Information			
Certificate Number	RSPO 633774	Certificate Start Date	30/08/2021
Date of First Certification	01/03/2011	Certificate Expiry Date	29/08/2026
Scope of Certification	Production of Sustainable Crude Palm Oil (CPO) and Palm Kernel (PK)		
Visit Objectives	<ul style="list-style-type: none"> • Determination of the conformity of the client's management system, or parts of it, with audit criteria. • Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements. 		
Assessment Cycle	<input type="checkbox"/> Pre-Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 2_2) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input type="checkbox"/> RSPO P&C 2018 for the Production of Sustainable Palm Oil <input checked="" type="checkbox"/> Indonesia National Interpretation 2020 for RSPO P&C 2018 for the Production of Sustainable Palm Oil		
Supply Chain Module	<input type="checkbox"/> Identity Preserved; <input checked="" type="checkbox"/> Mass Balance	Mill Capacity	70 MT/hour
ISH certification Phase	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		
Is this a remote audit or on-site audit	<input checked="" type="checkbox"/> On-site audit (Option AI)	<input type="checkbox"/> On-site audit (Option AII)	<input type="checkbox"/> Remote audit (Option B)

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
ID05/65250	ISO 14001:2004	SGS	10/06/2023
EU-ISCC-Cert-DE100-02043123	ISCC EU	SGS	02/02/2024
SGS-ID-ISPO-0033	ISPO	SGS	21/03/2024

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Ukui-1 POM	Ukui Village, Ukui District, Pelalawan Regency, Riau Province, Indonesia	00° 13' 32.09" S	102° 5' 39.84" E
Ukui Estate	Ukui Village, Ukui Sub-District, Pelalawan Regency, Riau Province, Indonesia	00° 13' 32.09" S	102° 5' 39.84" E
KUD Sumber Makmur (781 smallholders)	Bukit Gajah Village, Ukui Sub-District, Pelalawan Regency, Riau Province	00° 09' 04.05" S	102° 09' 26.01" E
KUD Bina Usaha Baru (308 smallholders)	Bukit Jaya Village, Ukui Sub-District, Pelalawan Regency, Riau Province	00° 09' 35.06" S	102° 06' 22.05" E
KUD Bakti (224 smallholders)	Trimulya Jaya Village, Ukui Sub-District, Pelalawan Regency, Riau Province	00° 08' 24.05" S	102° 05' 48.02" E
KUD Karya Bersama (432 smallholders)	Air Emas Village, Ukui Sub-District, Pelalawan Regency, Riau Province	00° 07' 00.00" S	102° 05' 54.06" E
KUD Sawit Subur (454 smallholders)	Kampung Baru Village, Ukui Sub-District, Pelalawan Regency, Riau Province	00° 09' 41.01" S	102° 03' 28.06" E
KUD Bina Sejahtera (618 smallholders)	Lubuk Kembang Sari Village, Ukui Sub-District, Pelalawan Regency, Riau Province	00° 12' 06.07" S	102° 06' 17.05" E
KUD Sumber Bahagia (603 smallholders)	Silikuan Hulu Village, Ukui Sub-District, Pelalawan Regency, Riau Province	00° 13' 55.08" S	102° 06' 30.06" E
KUD Bukit Potalo (247 smallholders)	Redang Seko Village, Ukui Sub-District, Pelalawan Regency, Riau Province	00° 10' 56.09" S	102° 13' 12.05" E
KUD Usaha Baru (247 smallholders)	Ukui 2 Village, Ukui Sub-District, Pelalawan Regency, Riau Province	00° 08' 40.06" S	102° 10' 09.00" E
Notes: -			

5. Description of Supply Base					
New Planting Development	<input checked="" type="checkbox"/> No (no change in total planted area)		<input type="checkbox"/> Yes		
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Ukui Estate	3,375	118	72	3,565	94.67
KUD Sumber Makmur	1,562	0	0	1,562	100
KUD Bina Usaha Baru	616	0	0	616	100
KUD Bakti	448	0	0	448	100
KUD Karya Bersama	864	0	0	864	100
KUD Sawit Subur	908	0	0	908	100
KUD Bina Sejahtera	1,236	0	0	1,236	100
KUD Sumber Bahagia	1,206	0	0	1,206	100
KUD Bukit Potalo	494	0	0	494	100
KUD Usaha Baru	494	0	0	494	100
Total	11,203	118	72	11,393	98.33

Note:

6. Plantings & Cycle						
Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Ukui Estate	494	1,675	19	1,187	2,881	494
KUD Sumber Makmur (781 smallholders)	1,032	0	0	530	1,562	0
KUD Bina Usaha Baru (308 smallholders)	0	472	0	144	144	472
KUD Bakti (224 smallholders)	392	0	0	56	448	0
KUD Karya Bersama (432 smallholders)	698	0	0	166	864	0
KUD Sawit Subur (454 smallholders)	0	0	0	908	908	0
KUD Bina Sejahtera (618 smallholders)	574	0	0	663	1,236	0

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KUD Sumber Bahagia (603 smallholders)	0	0	26	1,180	1,206	0
KUD Bukit Potalo (247 smallholders)	0	0	494	0	494	0
KUD Usaha Baru (247 smallholders)	0	0	494	0	494	0
Total (ha)	3,190	2,147	1,033	4,834	10,237	966

Note: Only Mature area is considered as production area

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

Estate / Smallholders	Tonnage / year			
	Estimated last year (Aug 2022 – July 2023)	Actual (May 2022 – April 2023)		Forecast (Aug 2023 – July 2024)
		Previous license period (May 2022-Oct 2022)	Current license period (Nov 2022 – Apr 2023)	
Ukui Estate	78,899	42,965.24	33,941.43	77,512
KUD Sumber Makmur	22,164	7,323.78	3,671.00	6,933
KUD Bina Usaha Baru	16,355	8,968.57	5,804.85	16,839*
KUD Bakti	-	333.14	264.11	701
KUD Karya Bersama	9,243	2,692.55	1,909.68	2,957
KUD Sawit Subur	2,216	7,272.64	8,101.00	16,266
KUD Bina Sejahtera	12,711	8,168.04	6,817.89	11,137
KUD Sumber Bahagia	16,491	7,333.31	6,767.12	14,666
KUD Bukit Potalo	10,037	6,090.80	4,765.78	9,237
KUD Usaha Baru	9,335	5,326.61	3,921.12	9,211
Total	177,451	172,438.65		165,495

Note:

*For the forecast of KUD Bina Usaha Baru 27.34 is possible due to the following reasons:

- the actual production for Jan-Dec 2022 is 17,425MT or 28.28MT FFB/Year/Ha.
- most of the area is already replanting (OP 2017)
- Using Topaz seeds (superior seeds from Asian Agri Research)
- companies that carry out management with full managed

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8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate / Smallholders	Tonnage / year			
	Estimated last year (Aug 2022 – July 2023)	Actual (May 2022 – April 2023)		Forecast (Aug 2023 – July 2024)
		Previous license period (May 2022-Oct 2022)	Current license period (Nov 2022 – Apr 2023)	
		Nil	Nil	
Total		Nil		
Note:				

9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage / year			
	Estimated last year (Aug 2022 – July 2023)	Actual (May 2022 – April 2023)		Forecast (Aug 2023 – July 2024)
		Previous license period (May 2022-Oct 2022)	Current license period (Nov 2022 – Apr 2023)	
3 rd Party		73,827.81	54,210.27	
Total		128,038.07		
Note:				

9A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	Month - Year	Volume of FFB from certified supply base (MT)	Volume of FFB from uncertified supply base (MT)	Total FFB/Month (MT)
1	May 2022	15,717.62	10,220.11	25,937.73
2	June 2022	17,799.93	11,978.69	29,778.62
3	July 2022	15,848.20	11,254.59	27,102.79
4	August 2022	15,738.87	13,727.62	29,466.49
5	September 2022	15,647.59	14,355.99	30,003.58
6	October 2022	15,722.47	12,290.81	28,013.28
7	November 2022	16,149.03	12,657.25	28,806.28
8	December 2022	14,854.07	9,405.90	24,259.97
9	January 2023	11,728.06	9,209.27	20,937.33
10	February 2023	10,730.78	6,586.98	17,317.76
11	March 2023	11,723.36	8,230.43	19,953.79

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12	April 2023	10,778.66	8,120.44	18,899.10
TOTAL		172,438.65	128,038.07	300,476.72
Note:				

10. Summary of Certified Tonnage (MT) (not applicable for ISS)			
Estimated last year (Aug 2022 – July 2023)	Actual (May 2022 – April 2023)		Forecast (Aug 2023 – July 2024)
	Previous license period (May 2022-Oct 2022)	Current license period (Nov 2022 – Apr 2023)	
FFB	FFB		FFB
177,451 mt	96,474.68 mt	75,963.97 mt	165,459 mt
	TOTAL	172,438.65 mt	
CPO (OER: 20.44%)	CPO (OER: 20.35%)		CPO (OER: 19.96%)
36,284 mt	19,540.70 mt	15,550.73 mt	33,032 mt
	TOTAL	35,091.43 mt	
PK (KER 5.19%)	PK (KER: 4.63%)		PK (KER: 5.32%)
9,227 mt	4,401.38 mt	3,573.98 mt	8,816 mt
	TOTAL	7,975.36 mt	
Note:			

10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	May 2022	3,215.69	776.82
2	June 2022	3,560.93	799.42
3	July 2022	3,202.78	730.59
4	August 2022	3,198.60	668.90
5	September 2022	3,178.68	678.14
6	October 2022	3,184.02	747.51
7	November 2022	3,329.06	745.15
8	December 2022	3,073.57	720.59
9	January 2023	2,342.13	545.36
10	February 2023	2,185.63	493.04
11	March 2023	2,413.56	529.81
12	April 2023	2,206.78	540.03
TOTAL		35,091.43	7,975.36

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Note:

11. Summary of Actual Volume sold

Current License period (Nov 2022 – Apr 2023)

	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	0	16,020.70	0	0	16,020.70
PK (MT)	3,804.46	0	0	0	3,804.46
Credits	0	0	0	0	0

Previous License period (May 2022-Oct 2022)

CPO (MT)	0	18,969.48	0	0	18,173.63
PK (MT)	4,100.78	0	0	0	4,100.78
Credits	0	0	0	0	0

Note: Conventional is RSPO certified material but sold as non-RSPO.

11A. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any)

No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	PT. IIS – Ukui KCP		0	7,905.24
TOTAL			0	7,905.24

Note:

11B. Records of CPO & PK Sold under other schemes since the last audit (if any)

No.	Buyers Name	Scheme Name	CPO Sold (MT)	PK Sold (MT)
1	PT. Sari Dumai Sejati	ISCC	34,990.18	0
TOTAL			34,990.18	0

Note:

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

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

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

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

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)
	NA	NA	NA	NA	NA	NA	NA
TOTAL			NA	NA	NA	NA	NA
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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Website: www.bsigroup.com

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 **08 – 13 May 2023**. The audit programme is included as Section 2.3. Where applicable, prior to the initial certification and recertification audit, 30 days Public Notification was made through the RSPO and BSI website on provide date.

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

The Critical NC close out on-site assessment was conducted on **27 July 2023**. The audit programs are included in Section 2.3.

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

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

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

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

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

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

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

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

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Re Certification 2)	Year 2 (ASA 2-1)	Year 3 (ASA 2-2)	Year 4 (ASA 2-3)	Year 5 (ASA 2-4)
Ukui – 1 POM	X	X	X	X	X
Ukui Estate	X	X	X	X	X
KUD Sumber Makmur (781 smallholders)	X				X
KUD Bina Usaha Baru (308 smallholders)	X		X		
KUD Bakti (224 smallholders)		X			
KUD Karya Bersama (432 smallholders)			X		X
KUD Sawit Subur (454 smallholders)		X	X		
KUD Bina Sejahtera (618 smallholders)		X		X	
KUD Sumber Bahagia (603 smallholders)			X		X
KUD Bukit Potalo (247 smallholders)	X			X	
KUD Usaha Baru (247 smallholders)					X

Tentative Date of Next Visit: May 15, 2024 - May 20, 2024

Total Number of Mandays: 28.5

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2.2 BSI Assessment Team

Name	Role	Competency
Nanang Rusmana	Team Leader	<p>Education: Holds a Bachelor Degree of Forestry, Bogor Agricultural University (IPB)</p> <p>Work Experience: 5 years working experience in palm oil industry as SHE Assistant at PT. Astra Agro Lestari Tbk. 3 years working experience in mining industry as Environment Coordinator and HSE Coordinator with PT. Kapuas Prima Coal Group. 7 years working experience as RSPO/ISPO auditor.</p> <p>Training attended: Completed ISO 9001:2015 Lead Auditor Course, ISPO Auditor Course, ISO 14001:2015 Lead Auditor Course, ISO 45001:2018 Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, Endorsed RSPO Supply Chain Certification Lead Auditor Course, SMK3 Auditor Course, HCV Assessor Course, General OHS Expert Course, SMETA Requirements training RSPO ISH Standard Training and Endorsed RSPO Refresher Courses.</p> <p>Language proficiency: Fluent in Bahasa Indonesia and English</p> <p>Aspect covered in this audit: During this assessment he assessed on the aspects of Agronomy best management practices, mill best management practices, company policy and continual improvement.</p>
Mujinius Jalaraya	Team Member	<p>Education: Holds a Bachelor Degree majoring in Forest Resources Conservation and Ecotourism, Bogor Agricultural University (IPB).</p> <p>Work Experience: 6 years working experience in palm oil plantations as SHE Assistant at PT. Astra Agro Lestari Tbk and Sustainability Supervisor at Teladan Prima Group. 8 years working experience as RSPO Auditor / Lead Auditor.</p> <p>Training attended: Completed ISO 9001 Lead Auditor course, ISPO Lead Auditor course, Endorsed RSPO P&C Lead Auditor course, Endorsed RSPO SCCS Lead Auditor course, Introductory Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation, ISO 14001 Internal Auditor Training, ISO 45001 Lead Auditor course, OHS Expert Training, SMETA Requirements Training, RSPO ISH Standard Training and Endorsed RSPO Refresher Courses.</p> <p>Language proficiency: Fluent in Bahasa Indonesia and English</p> <p>Aspect covered in this audit: During this audit, he assessed on OHS, RSPO Supply Chain requirement, Continual improvement.</p>
Edy Widodo	Team Member	<p>Education: Holds a Bachelor Degree majoring Agricultural Technology from University of Padjadjaran, Bandung.</p> <p>Work Experience: 8 years working experience in palm oil industry as Agronomist and Assistant Manager in various companies. 9 year working experience as RSPO/ISPO auditor.</p> <p>Training attended: 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</p>

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		<p>Stock (HCS) in Oil Palm Plantation RSPO ISH Standard Training and Endorsed RSPO Refresher Courses.</p> <p>Language proficiency: Fluent in Bahasa Indonesia and English</p> <p>Aspect covered in this audit: During this audit, he assessed on Policy and commitment, social requirements, contract agreement, human rights, workers' welfare, and Stakeholder consultation.</p>
Imam Fakhrurozi	Team Member	<p>Education: Holds a Bachelor Degree majoring in Agriculture Technology, Gadjah Mada University.</p> <p>Work Experience: 2 years working experience oil palm industry, as a sustainability and HSE officer. 7 years working experience as RSPO Auditor / Lead Auditor</p> <p>Training attended: Completed ISO 9001:2008 Lead Auditor Course, 14001:2004 Lead Auditor Course, SMK3 Lead Auditor Course, Endorsed RSPO P&C Lead auditor course, ISO 45001:2018 Lead Auditor Course, SMETA requirements training, Introductory Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation, RSPO ISH Standard Training and Endorsed RSPO Refresher Courses.</p> <p>Language proficiency: Fluent in Bahasa Indonesia and English</p> <p>Aspect covered in this audit: During this audit, he assessed on the aspects of OHS and Environmental management and monitoring and</p>
Eko Prastio Ramadhan	Team Member	<p>Education: Holds a Bachelor Degree in Forest Resources Conservation and Ecotourism from Forestry Faculty, Bogor Agricultural University (IPB).</p> <p>Work Experience: Over 4 years of working experience in biodiversity officer with Birdlife Indonesia and consultant with PT Inoa Konsultindo. Over 2½ years of working experience in palm oil estate with PT Salim Ivomas Pratama Tbk and Capitol Plantation Group implementing sustainability. Over 4½ years of working experience as RSPO P&C Certification Program Manager and auditor covering standard such as RSPO P&C, RSPO SCCS, ISPO, ISO 9001 and ISO 14001.</p> <p>Training attended: Completed ISO 14001:2015 Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, Social Impact Assessment Training, Endorsed RSPO SCC Auditor Lead Auditor Course, ISPO Auditor Batch 19 Training, ISO 9001 Lead Auditor Course, Identification of HCV Areas Training, RSPO ISH Standard Training and Endorsed RSPO Refresher Courses.</p> <p>Language proficiency: Fluent in Bahasa Indonesia and English</p> <p>Aspect covered in this audit: During this audit, he assessed on HCV management and monitoring, Environment responsibility, environment impact assessment and management plan.</p>

Accompanying Persons:

Name	Role
None	None

2.3 Assessment Plan

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

Date	Time	Subjects	NR	EPR	MJ	IF	EWD
Monday, 08 May 2023	08.00 – 08.30	Opening Meeting <ul style="list-style-type: none"> • Presentation by PT. IIS – Ukui I POM, Estate and Smallholder • Presentation by BSI Indonesia 	√	√	√	√	√
	08.30 – 12.00	Field Visit to Ukui Estate <ul style="list-style-type: none"> • Herbicide application programmes, harvesting, fertilizing operations, water management, road maintenance, terracing, HCV's, riparian zones, etc. • Agrochemical stores, Fertilizer store, workshops, housing, landfill, clinic, riparian zones, Hazardous Waste, waste management, etc. • Boundaries inspection, worker interviews, social amenities, etc. 	√	√	√	√	
	09.00 – 12.00	Public Consultation (External) <ul style="list-style-type: none"> • Local communities • Contractor • Governance body 					√
	12.00 – 14.00	Break	√	√	√	√	√
	14.00 – 16.30	Field Visit to Ukui I POM <ul style="list-style-type: none"> • Occupational Health and Safety, Environment Aspect. • Social Aspect and workers welfare, workers interview • Best Management Practice for Mill and supply chain for mill. • Field implementation for Operation Procedure. • Inspection of processing, warehouse, workshop, mill wastes management, Effluent Ponds, OHS, Environment issues, POME application, workers interview, Supply chain for CPO mill, Review on SEIA documents and records, Document review, etc. 	√	√	√	√	
	14.00 – 16.30	Public Consultation (Internal) <ul style="list-style-type: none"> • Union Labour • Cooperative • Gender committee 					√

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Date	Time	Subjects	NR	EPR	MJ	IF	EWD
	16.30 – 17.00	Wash-up Meeting	√	√	√	√	√
Tuesday, 09 May 2023	08.00 – 12.00	Field Visit to Scheme Smallholder KUD Bina Usaha Baru 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. (18 samples)	√		√		
	08.00 – 12.00	Field Visit to Scheme Smallholder KUD Sawit Subur 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. (21 samples)		√		√	√
	12.00 – 14.00	Break	√	√	√	√	√
	14.00 – 16.30	Field Visit to Scheme Smallholder KUD Karya Bersama 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. (21 samples)	√	√	√	√	√
	16.30 – 17.00	Wash-up Meeting	√	√	√	√	√
Wednesday, 10 May 2023	08.00 – 12.00	Field Visit to Scheme Smallholder KUD Sumber Bahagia 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. (16 samples)	√	√	√	√	√
	12.00 – 14.00	Break	√	√	√	√	√
	14.00 – 16.30	Document Review for Ukui I POM and Ukui Estate	√	√	√	√	√
	16.30 – 17.00	Wash-up Meeting	√	√	√	√	√
Thursday, 11 May 2023	08.00 – 12.00	Document Review for Ukui I POM and Ukui Estate	√	√	√	√	√
	12.00 – 14.00	Break	√	√	√	√	√
	14.00 – 16.30	Document Review for Ukui I POM and Ukui Estate	√	√	√	√	√
	16.30 – 17.00	Wash-up Meeting	√	√	√	√	√

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Date	Time	Subjects	NR	EPR	MJ	IF	EWD
Friday, 12 May 2023	08.00 – 12.00	Document Review for Scheme Smallholder	√	√	√	√	√
	12.00 – 14.00	Break	√	√	√	√	√
	14.00 – 16.30	Document Review for Scheme Smallholder	√	√	√	√	√
	16.30 – 17.00	Wash-up Meeting	√	√	√	√	√
Saturday, 13 May 2023	08.00 – 10.00	Document review	√	√	√	√	√
	10.00 – 10.30	Auditor Meeting / Preparation for Closing meeting	√	√	√	√	√
	10.30 – 12.00	Closing meeting	√	√	√	√	√

NCR Close-Out Visit Assessment Plan

Date	Time	Subjects	NR
Tuesday, 27/07/2023	08.00 – 08.30	Opening Meeting - Presentation by PT. Inti Indosawit Subur Ukui I POM & Supply bases - Presentation by BSI Indonesia	√
	08.30 – 11.00	PT. Inti Indosawit Subur Ukui I POM Verifying of correction, root-cause and corrective action (interview, document review and field observation)	√
	10.45 – 11.15	Report Preparation	√
	11.15 – 12.00	Closing Meeting	√

Section 3: Assessment Findings

3.1 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?	PT Inti Indosawit Subur has explained the certification plan for all of its subsidiaries; indicating all palm oil mills, company-owned estates and scheme smallholder as the supply base.	Complied
Have all the estates and mills certified within five (5) years after obtaining RSPO membership? If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021	There are remaining mill and estate that has not certified yet, Bahilang Estate (Supply bases for Tanah Datar Mill) planned in year 2024 due to still in process of RACP. Teluk Panjie Estate (801ha) as supply bases for Teluk Panjie Mill planned in 2026 due to HGU still in process. Sentral Estate (Supply bases for Gunung Melayu II POM planned in 2024 due to still in process of RACP. Revision of TBP has been approved by RSPO on 19/04/2023	Complied
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available. If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021.	No, there is no new acquisition conducted by PT Inti Indosawit Subur and its subsidiary.	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	Yes, there is time bound plan revision dated 19 April 2023, signed by Management Representative. Justification available, it caused: <ul style="list-style-type: none"> - Topaz Estate (Supply Bases for Topaz POM) with area 230 Ha the HGU is still on proses to Local Government and BPN Pusat, so the plan year for certification is 2026. - Bahilang Estate (Supply Bases for Tanah Datar Mill) with area 1,019 Ha the concept note still on progress and submit to RACP team at Q2 2023. Target to conduct audit at Q1 2024. - Teluk Panji Estate (Supply Bases for Teluk Panjie POM) with area 801 Ha the HGU still on progress since the estate under 2 different provinces, the final approval must come from National Authority (BPN Pusat). Target to conduct audit in 2026. 	Complied

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	<ul style="list-style-type: none"> - Sentral Estate (Supply Bases for Gunung Melayu II POM) with area 2,996 Ha. Concept Note still on Progress and submit to RaCP team at Q2 2023. Target to conduct audit at Q1 2024. <p>Revision of TBP has been approved by RSPO on 19/04/2023</p>	
<p>Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required.</p> <p>Is this consistent with the ACOP reporting?</p>	<p>Yes, there is time bound plan revision dated 19 April 2023, signed by Management Representative. Justification available, it caused:</p> <ul style="list-style-type: none"> - Topaz Estate (Supply Bases for Topaz POM) with area 230 Ha. the HGU is still on proses to Local Government and BPN Pusat, so the plan year for certification is 2026. - Bahilang Estate (Supply Bases for Tanah Datar Mill) with area 1,019 Ha the concept note still on progress and submit to RACP team at Q2 2023. Target to conduct audit at Q1 2024. - Teluk Panji Estate (Supply Bases for Teluk Panji POM) with area 801 Ha the HGU still on progress since the estate under 2 different provinces, the final approval must come from National Authority (BPN Pusat). Target to conduct audit in 2026. - Sentral Estate (Supply Bases for Gunung Melayu II POM) with area 2,996 Ha. Concept Note still on Progress and submit to RaCP team at Q2 2023. Target to conduct audit at Q1 2024. <p>Revision of TBP has been approved by RSPO on 19/04/2023</p>	Complied
<p>Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised</p>	<p>There is no any isolated lapses in implementation of the plan. There are the changing on the plan due to RaCP process in Bahilang Estate and Sentral Estate and HGU issuance for Teluk Panji Estate and Topaz Estate.</p>	Complied
<p>Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised</p>	<p>There is no fundamental failure to proceed with implementation of the plan. Company has taken action to proceed all uncertified unit to complete the RaCP and to obtain the HGU for Teluk Panji Estate and Topaz Estate.</p>	Complied
<p>Un-Certified Units or Holdings</p>		
<p>No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12.</p>	<p>According to Land Use change analysis, there are several area conversion cacao plantation in Bahilang Estate and Sentral Estate, no primary forest.</p> <p>Bahilang Estate (PT Nusa Pusaka Kencana/NPK). RaCP still under Process. Concept Note still on</p>	Complied

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	<p>Progress and submit to RaCP team at Q2 2023. Target to conduct audit at Q1 2024.</p> <p>Sentral Estate (PT Gunung Melayu). RaCP still under Process. Certification audit will be planned on 2024. LUCA submission has been sent on 28 Dec 2020, latest update from RSPO email dated 18 March 2021 to company, LUCA still under review and report needs clarification and still follow up by company.</p> <p>Teluk Panji Estate. HGU for this unit has not been obtained and still under process. Certification audit will be planned on 2026. Latest updated April 2023, HGU still on Progress, since the estate under 2 different provinces, the final approval must come from National Authority (BPN Pusat).</p> <p>Revision of TBP has been approved by RSPO on 19/04/2023.</p>	
<p>Any new plantings since January 1st 2010 shall comply with the RSPO New Plantings Procedure.</p>	<p>According to Land Use change analysis, there are several area conversion cacao plantations in Bahilang Estate and Sentral Estate, no primary forest.</p> <ul style="list-style-type: none"> • Bahilang Estate (PT Nusa Pusaka Kencana/NPK). RaCP still under Process. Concept Note still on Progress and submit to RaCP team at Q2 2023. Target to conduct audit at Q1 2024. • Sentral Estate (PT Gunung Melayu). RaCP still under Process. Certification audit will be planned on 2024. LUCA submission has been sent on 28 Dec 2020, latest update from RSPO email dated 18 March 2021 to company, LUCA still under review and report needs clarification and still follow up by company. • Teluk Panji Estate. HGU for this unit has not been obtained and still under process. Certification audit will be planned on 2026. Latest updated April 2023, HGU still on Progress, since the estate under 2 different provinces, the final approval must come from National Authority (BPN Pusat). • Topaz Estate (Supply Bases for Topaz POM) with area 230 Ha. the HGU is still on proses to Local Government and BPN Pusat, so the plan year for certification is 2026. 	<p>Complied</p>
<p>Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.</p>	<p>According to internal audit result in 2022, there is no land conflict occur in Bahilang Estate, Sentral Estate, Teluk Panji Estate, and Topaz Estate. In addition, the company has been certified for ISPO (Indonesian Sustainable Palm Oil) since December 2016.</p> <p>According to the RSPO RaCP tracker (https://www.rspo.org/certification/remediation-</p>	<p>Complied</p>

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	<p>and-compensation/racp-tracker) update 01 September 2022, PT Inti Indosawit Subur has:</p> <ul style="list-style-type: none"> • MU's with potential liabilities: 4 units • LUCA Submitted (MUs): 4 units • LUCA review completed (MUs): 4 units • Concept Note required (MUs): 3 units • Concept Note submitted (MUs): 2 units • Concept Note approved (MUs): 2 • Concept Note submitted (MUs): 2 • Concept Note endorsed (MUs): 0 • Remediation Plan required (MUs): 4 units • Remediation Plan submitted (MUs): 0 • Remediation Plan approved (MUs): 0 	
<p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2</p>	<p>Internal audit has conducted for Bahilang Estate on 08-09 February 2022, Teluk Panji Estate on 18-23 February 2022 and Sentral Estate on 22-27 August 2022, there is no Labor disputes occur in this management unit. In addition, the company has been certified for ISPO (Indonesian Sustainable Palm Oil) since December 2016.</p> <p>Besides that, interview with management representative who assign as PIC for certification was conducted to know the process of internal audit that has been held.</p> <p>There are no ongoing case/s of grievances or complaint based on RSPO Complaint tracker (https://askrspo.force.com/Complaint/s/casetracker)</p>	<p>Complied</p>
<p>Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1</p>	<p>Internal audit has conducted for Bahilang Estate on 08-09 February 2022, Teluk Panji Estate on 18-23 February 2022 and Sentral Estate on 22-27 August 2022, there is no legal non-compliance occur in this management unit. In addition, the company has been certified for ISPO (Indonesian Sustainable Palm Oil) since December 2016.</p>	<p>Complied</p>
<p>Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.</p>	<p>Internal audit has been conducted for Bahilang Estate on 08-09 February 2022, Teluk Panji Estate on 18-23 February 2022 and Sentral Estate on 22-27 August 2023. Report of internal audit are available. Result of internal audit:</p> <ul style="list-style-type: none"> - Bahilang Estate, Teluk Panji Estate, Topaz Estate and Sentral Estate has complied to relevant regulation, no issue regarding the legal compliance. - No complaint or grievances and disputes from stakeholders and affected parties. - No labor disputes occur since the latest audit. 	<p>Complied</p>

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

3.2 Progress of scheme smallholders and/or outgrowers

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

major NC if this requirement is not met after three years.		
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Approved Time Bound Plan

Approved by RSPO on 19/04/2023

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

		Ukui (Plasma)	Ukui & Lubuk Batu Jaya District, Pelalawan & Inhu Regency, Riau	2011	Certified on 1 March 2011 Re-Certified on 1 March 2016 Re-certified in 2021
Tungkal Ulu Mill - PT Inti Indosawit Subur	Pulau Pauh / Penyabungan / Merlung Village, Tungkal Ulu District, Tanjung Jabung Regency, Jambi	Tungkal Ulu Estate	Pulau Pauh / Penyabungan / Merlung Village, Tungkal Ulu District, Tanjung Jabung Regency, Jambi	2012	Certified on 15 August 2012 Re-Certification in August 2017 Re-certified in 2022
		Tungkal Ulu (Plasma)	Renah Mendalo, Merlung, Muara Papalik District, Tanjung Jabung Barat Regency,	2012	Certified on 15 August 2012 Re-Certification in August 2017 Re-certified in 2022
Muara Bulian Mill - PT Inti Indosawit Subur	Singoan / Bukit Sari / Bulian Jaya Village, Muara Bulian / Pelayung District, Batang Hari Regency, Jambi	Muara Bulian Estate	Singoan / Bukit Sari / Bulian Jaya Village, Muara Bulian / Pelayung District, Batang Hari Regency,	2013	Certified on 12 July 2013 Re-Certification in August 2017 Re-certified in 2022
		Muara Bulian (Plasma)	Maro Sebo Ilir District, Batanghari Regency, Jambi	2013	Certified on 12 July 2013 Re-Certification in August 2017 Re-certified in 2022
Topaz Mill – PT Tunggal Yunus Estate	Petapahan Village, Tapung District, Kampar Regency, Riau	Topaz Estate	Petapahan Village, Tapung District, Kampar Regency, Riau	2015	Certified on 30 March 2015 Re-certified in 2020
		Topaz Estate (230 Ha)	Petapahan Village, Tapung District, Kampar Regency, Riau	2026	HGU still on process, to propose to Local Government and BPN Pusat
Taman Raja Mill – PT Dasa Anugrah Sejati	Lubuk Bernai / Kampung Baru / Pelabuhan Dagang / Pematang Pauh Village, Tungkal Ulu District, Tanjung Jabung Regency, Jambi	Taman Raja, Badang & Bernai Estate*	Lubuk Bernai / Kampung Baru / Pelabuhan Dagang / Pematang Pauh Village, Tungkal Ulu District, Tanjung Jabung Regency, Jambi	2015	Certified on 20 February 2015 *Bernai Estate Split From Taman Raja & Badang Estate Since 1 January 2019 Re-certified in 2020
Segati Mill – PT Mitra Unggul Pusaka	Langkan / Penarikan / Tambak / Sotol Village, Langgam	Segati Estate	Langkan / Penarikan / Tambak / Sotol Village, Langgam District, Pelalawan Regency, Riau	2022	Certified on 1 November 2022

	District, Pelalawan Regency, Riau	Gondai Estate	Pangkalan Sarik / Baru Village, Langgam / Siak Hulu District, Pelalawan / Kampar Regency, Riau	2022	Certified on 1 November 2022
Penarikan Mill – PT Mitra Unggul Pusaka	Penarikan Village, Langgam District, Pelalawan Regency, Riau	Penarikan Estate*	Penarikan / Tambak Village, Langgam District, Pelalawan Regency, Riau	2022	Certified on 1 November 2022
Tanah Datar Mill – PT Supra Matra Abadi	Tanah Datar Petatal Village, Talawi District, Asahan Regency, North Sumatera	Tanah Datar Estate	Tanah Datar Petatal Village, Talawi District, Asahan Regency, North Sumatera	2015	Certified on 18 May 2015 Re-certified in 2020
		Bahilang Estate (1,019 Ha)	Bahilang Village, Tebing Tinggi District, Serdang Bedagai Regency, North Sumatera	2024	*Bahilang Estate on Process RaCP
Aek Nabara Mill – PT Supra Matra Abadi	S1-S3 / Sukadame Village, Bilah Hulu / Kota Pinang District, Labuhan Batu Regency, North Sumatera	Aek Nabara Estate	S1-S3 / Sukadame Village, Bilah Hulu / Kota Pinang District, Labuhan Batu Regency, North Sumatera	2015	Certified on 6 March 2015 Re-certified in 2020
Teluk Panjie Mill – PT Supra Matra Abadi	Teluk Panjie Village, Kampung Rakyat District, Labuhan Batu Regency, North Sumatera	Teluk Panjie Estate (3,885 Ha)	Teluk Panjie Village, Kampung Rakyat District, Labuhan Batu Regency, North Sumatera	2015	Certified on 21 April 2015 Re-certified in 2020
		Teluk Panjie Estate (801 Ha)		2026	* HGU still on Progress, since the estate under 2 different provinces, the final approval must come from National Authority (BPN Pusat)
Peranap Mill – PT Rigunas Agri Utama	Simelinyang / Pauh Ranap / Sengkilo Village, Peranap District, Indragiri Hulu Regency, Riau	Peranap Estate	Simelinyang / Pauh Ranap / Sengkilo Village, Peranap District, Indragiri Hulu Regency, Riau	2015	Certified on 7 January 2015 Re-certified in 2020
		Peranap (Plasma)		2016	Certified on 18 August 2016 Re-certified in 2021
Bungo Tebo Mill – PT Rigunas Agri Utama	Tuo Sumai / Sungai Rambai Village, PWK Sumai / Tebo Ulu District, Bungo	Bungo Tebo Estate	Tuo Sumai / Sungai Rambai Village, PWK Sumai / Tebo Ulu District, Bungo Tebo Regency, Jambi	2015	Certified on 3 December 2015 Re-certified in 2020
		Bungo Tebo (Plasma)		2017	Certified on 7 February 2017

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	Tebo Regency, Jambi				Re-certified in 2022
Tanjung Selamat Mill – PT Indo Sepadan Jaya	Kampung Padang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	Tanjung Selamat	Kampung Padang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	2015	Certified on 26 May 2015 Re-certified in 2020
		Pangkalan	Sennah Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	2015	Certified on 26 May 2015 Re-certified in 2020
Gunung Melayu I – PT Saudara Sejati Luhur	Rahuning Village, Bandar Pulau District, Asahan Regency, North Sumatra	Pulau Maria Estate	Rahuning Village, Bandar Pulau District, Asahan Regency, North Sumatra	2015	Certified on 7 September 2015 Re-certified in 2020
Gunung Melayu II – PT Gunung Melayu	Gonting Malaha Village, Bandar Pulau District, Asahan Regency, North Sumatra	Aek Tarum & Batu Anam Estate	Gonting Malaha Village, Bandar Pulau District, Asahan Regency, North Sumatra	2015	Certified on 8 July 2015 Re-certified in 2020
		Sentral Estate (2,996 Ha)		2024	* Concept Note still on Progress and submit to RaCP team at Q2 2023. Target to conduct audit at Q1 2024
Negri Lama II Mill – PT Hari Sawit Jaya	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	Negri Lama	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	2016	<ul style="list-style-type: none"> • Certified on 23 December 2016 as Independent Mill • Audit in 2016 as Mill and Supply Base • Re-certified in 2021
		Aek Kuo (2,088 Ha)	Aek Korsik Village, Aek Natas District, Labuhan Batu Regency, North Sumatra	2018	Certified in 2018
		Aek Kuo (501 Ha)		2018	
Negri Lama I Mill – PT Hari Sawit Jaya	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	*3rd party which is excluded from scope of certification	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	2015	<ul style="list-style-type: none"> • Certified on 8 April 2015 • Audit in 2016 as Independent Mill • Re-certified in 2020

3.3 Details of Nonconformities

The nonconformities are listed below. The findings summary of the assessment by criteria are listed in Appendix A. During this Assessment there were 1 (one) Major and 1 (one) Minor nonconformity raised. The PT Inti Indosawit Subur – Ukui I POM Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

Non-conformity			
NCR Ref #	2346729-202305-N1	Issued Date	13/05/2023
Due Date	ASA 2-3	Closure Date	Next annual surveillance assessment
Indicator & Category (Critical / Minor)	RSPO INA NI 2020, Clause 3.1.2 - Minor		
Statement of Nonconformity:	Plasma Ukui Group (Ukui I) already has and established a replanting program, however during field verification it was found that farmer plots were carrying out replanting (under planting) independently and not in accordance with the established replanting provisions.		
Requirement Reference:	An annual replanting programme projected for a minimum of five years with yearly review, is available.		
Objective Evidence:	Based on the results of a field visit to a sample of Ukui I Plasma plots, it was found that farmers carried out independent replanting by means of under planting outside of the replanting program that has been set by the Plasma Management and KUD, namely in the KUD Bina Usaha Baru there were 4 plots.		
Corrections:	Identify and justify underplanting that occurs in Ukui plasma plantations.		
Root Cause Analysis:	<ul style="list-style-type: none"> • The number of farmers who have done under planting has not yet been identified. • Not yet done underplanting justification done. 		
Corrective Actions:	<ul style="list-style-type: none"> • Conduct pre-replanting socialization and ensure that all farmers who will carry out replanting are carried out according to procedures. • Outreach to farmers who carry out underplanting to state that they are willing to follow the terms and conditions of certification. 		
Assessment Conclusion:	CAP effectiveness will be verified during the next audit (ASA2_3).		

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Non-conformity			
NCR Ref #	2346729-202305-M1	Issued Date	13/05/2023
Due Date	12/08/2023	Closure Date	27/07/2023
Indicator & Category (Critical / Minor)	RSPO INA NI 2020, Clause 6.2.2 - Major		
Statement of Nonconformity:	At the time of the audit, it was found that workers were doing work without a work contract with the company.		
Requirement Reference:	(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed.		
Objective Evidence:	Based on the results of interviews with employees at Ukui I (Ukui Estate) with a sample of employees (Initial YN), it was found that it was confirmed that there were workers who assisted in harvesting activities (Kutip Brondol) who were not registered as workers and did not have work contracts with the company.		
Corrections:	<ul style="list-style-type: none"> • The organization makes a policy (memo) from management site regarding the prohibition of bringing workers without a work contract. • The organization conducts socialization to harvesters regarding the prohibition to bring workers without a work contract. • Organizations install signboards related to the prohibition on bringing in workers without a work contract in every afdeling office. 		
Root Cause Analysis:	<ul style="list-style-type: none"> • Harvesters bring workers (quote brondol) who do not have a work agreement with the company with the aim of speeding up the work process in the field, while management has strictly stipulated to prohibit bringing in people who help work in the field, each work must carry out a work agreement with the company. • The Mandor has already carried out supervision by monitoring in the morning and when working in the field, this can happen because the supervisor does not know that there are harvesters bringing auxiliary workers because monitoring in the field is carried out in stages at each harvester block. 		
Corrective Actions:	<ul style="list-style-type: none"> • The Mandor monitors during the morning master and when working in the field every day for people who help employees harvest while working. • Give warnings to sanctions to harvesters if harvesters are still found bringing harvest assistants who do not have work contracts in the field. 		
Assessment Conclusion:	<p>Verification</p> <p>Correction:</p> <p>There is evidence that the organization has made a policy (Memo) from management related to the prohibition of bringing workers without a work contract as stated in the General Manager’s Memorandum No. 030/GM-KUK/MEMO/06/23 dated 2 June 2023 regarding “Prohibition of Bringing</p>		

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Children, Wives and Workers without Having a Work Contract with the Company - "*Larangan Membawa Anak, Istri dan Pekerja tanpa Memiliki Kontrak Kerja dengan Perusahaan*". The memo explained that in particular, harvest workers are prohibited from bringing their children, wives and workers who do not have a work contract with the company to the field and will be given a verbal warning and a warning letter.

There is evidence of socialization to harvesters regarding the prohibition to bring workers without a work contract namely Minutes of Socialization, photos and attendance list, verified documents, namely for example:

- Afdeling 1 - Ukui Estate, socialization was carried out on 05/06/2023, attended by 34 harvesters.
- Afdeling 2 - Ukui Estate, socialization was carried out on 05/06/2023, attended by 30 harvesters.
- Afdeling 3 - Ukui Estate, socialization was carried out on 08/06/2023, attended by 46 harvesters.
- Afdeling 4 - Ukui Estate, socialization was carried out on 05/06/2023, attended by 33 harvesters.

There is evidence that the organization has put up warnings/signboards prohibiting bringing in workers without a work contract in every Afdeling of the office. Verified evidence, namely the Minutes of Billboard Installation:

- Afdeling 1 - Ukui Estate, installation of warnings/billboards was carried out on 05/06/2023.
- Afdeling 2 - Ukui Estate, installation of warnings/billboards was carried out on 05/06/2023.
- Afdeling 3 - Ukui Estate, installation of warnings/billboards was carried out on 05/06/2023.
- Afdeling 4 - Ukui Estate, installation of warnings/billboards was carried out on 05/06/2023.

Corrective Action:

- There is evidence that supervisors carry out monitoring in the morning and while working in the field every day for people who help employees harvest while working. The verified document is the "*Monitoring Pembantu Paner*" for the period June and July 2023. The monitoring results show that none of the harvesters brought any helpers. The monitoring is made by the Foreman and verified by the Assistant.
- Related to the rules for giving warnings to sanctions against harvesters if workers are found who do not have work contracts in the field, it is regulated in Memo No. 030/GM-KUK/MEMO/06/23 dated 2 June 2023 regarding "Prohibition of Bringing Children, Wives and Workers without Having a Work Contract with the Company/*Larangan Membawa Anak, Istri dan Pekerja tanpa Memiliki Kontrak Kerja dengan Perusahaan*". Until the NCR Close Out audit was conducted, no warning letter were issued to harvest workers.

Field visit results have also been carried out at Ukui Estate, namely:

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	<ul style="list-style-type: none"> Field verification and interview to the harvesters was carried out at Ukui Estate during harvesting activities in Block C89d Afdeling 4, harvesters were observed working alone and based on interviews it was known that harvesters had understood the rules prohibiting bringing in workers without a contract contained in the GM Memo. It was also conveyed that harvesters do not bring helper in the field during harvest activities. Interviews were conducted with the Mandor and Assistant Afdeling, it was stated that the foreman supervised the morning meeting by filling out the monitoring form, and when carrying out work in the field when inspecting the harvest. From the results of the foreman's monitoring in June and July 2023 which were known to the assistant it was known that there was no more harvester who brought helper without work contracts in harvesting activities. The results of interviews with field assistants conveyed that socialization was continuing, and random checks were carried out during harvest block visits, the result was that in the period June and July 2023 there were no workers bringing helper/without work contract to harvest activities. Interviews with Union (SPSI Ukui Estate) have also been conducted. It was reported that from the monitoring of the union, there are no harvest workers who bring helper/without contract. <p>Based on the CAP verification results, it was concluded that M1's findings (Ukui I POM) could be closed.</p>
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Opportunity for Improvements	
OFI #	Description
OFI 1	Nil

Positive Findings	
PF #	Description
PF 1	Nil

3.3.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	2211523-202205-N1	Issued Date	24/05/2022
Due Date	ASA 2-2	Closure Date	13/05/2023
Indicator & Category (Critical / Minor)	6.7.2		
Statement of Nonconformity:	The organization has established an emergency procedure, however it was found the inconsistency of implementation in the field.		

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:	<ul style="list-style-type: none"> • Eyewash and shower in front of agro-chemical warehouse could not be use due to shortage of water supply. • Fire extinguisher in Estate Workshop was not monitored regularly and has been expired since 9 October 2021. • Fire extinguisher in Oil Storage – Ukui Estate and Water Treatment Station (WTP) not equipped with monitoring list and information when to refill. • Fire extinguisher in Mill workshop was not available. • Fire extinguisher in KCP Ukui I (within Ukui I Mill area) and Water Treatment Station (WTP) was available, however could not be used. In addition, no checklist monitoring was available.
Corrections:	<ul style="list-style-type: none"> - Ensure the supply of water for eyewash and handwash is always available and can be used at any time. - Replace/refill the APAR – Alat Pemadam Api Ringan (Fire extinguisher)) with an APAR that is ready to use and install a monthly APAR monitoring form.
Root Cause Analysis:	Lack of monitoring and evaluation in the field by company management to ensure the emergency procedure is well implemented.
Corrective Actions:	<p>To conduct the regular monitoring and evaluation of emergency procedure implementation including:</p> <ol style="list-style-type: none"> 1. Regular emergency response equipment monitoring (monthly) by monitoring form checklist and inspection. 2. Regular evaluation of emergency response procedure implementation through monthly meeting (Safety committee/P2K3 monthly meeting)
Assessment Conclusion:	Audit team has reviewed the root cause analysis and accepted the CAP. Audit team went onsite and verified field condition as part of correction. Audit team verified monitoring plan, monitoring record. Audit team deemed the correction and corrective action is effective to close out Non-Critical/Minor NC.
Effectiveness Closure (for previous audit closed Critical NC):	N/A

Non-conformity			
NCR Ref #	2211523-202205-N2	Issued Date	24/05/2022
Due Date	ASA 2-2	Closure Date	13/05/2023
Indicator & Category (Critical / Minor)	3.3.2		
Statement of Nonconformity:	Company has established a mechanism to check consistent implementations of procedures, however still found inconsistencies.		

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Requirement Reference:	A mechanism to check consistent implementation of procedures is in place
Objective Evidence:	The Company already has SOP AA-APM-OP-1100.8-R5 Pengendalian Gulma (Weed Control) which states that chemical weed control is only apply in circle and path, however during field visit was found blanket spraying at Kapling No.2345 Rusdi (KT124 KUD Sumber Bahagia), and then koperasi has a policy to prohibit blanket spraying.
Corrections:	Providing information and training/socialization to smallholder member not to do blanket spraying according to SOP AA-APM-OP-1100.8-R5 Pengendalian Gulma (Weed Control)
Root Cause Analysis:	Lack of monitoring from Plasma management to ensure the weeds control procedure implementation in the field.
Corrective Actions:	To conduct regular monitoring (each 3 month) of weeds control procedure implementation in the field by Plasma management.
Assessment Conclusion:	Audit team has reviewed the root cause analysis and accepted the CAP. Audit team went onsite and verified field condition as part of correction. Audit team verified monitoring plan, monitoring record. Audit team deemed the correction and corrective action is effective to close out Non-Critical/Minor NC.
Effectiveness Closure (for previous audit closed Critical NC):	N/A

Opportunity for Improvement	
OFI#	Description
OFI 1	<p>OFI Statement: Extension of HGU No.1/1989 still on progress of renewal. Company emphasize to accelerate the action to complete and finish the HGU renewal process.</p> <p>Verification / Follow-up actions: For the 1 (one) OFI from the previous audit namely related to extension of HGU No.1/1989 still on progress of renewal. Company emphasizes to accelerate the action to complete and finish the HGU renewal process. The company has demonstrated the process of obtaining HGU.</p>

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
Recertification Assessment (RAV2)				
1996001-202011-M1	Critical (Major)	1.1.1	01/12/2020	Closed on 04/02/2021
1996001-202011-N1	Minor	6.7.5	01/12/2020	Closed on 04/02/2021

2042254-202103-M1	Critical (escalated from minor)	6.2.7	31/03/2021	Closed on 25/06/2021
ASA2_1				
2211523-202205-N1	Minor	6.7.2	29/05/2022	Closed on 13/05/2023
2211523-202205-N2	Minor	3.3.2	29/05/2022	Closed on 13/05/2023
ASA2_2				
2346729-202305-N1	Minor	3.1.2	13/05/2023	Open
2346729-202305-M1	Critical (Major)	6.2.2	13/05/2023	Closed on 27/07/2023

3.4 Stakeholders and previous land owner / user consultation

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

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

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

Stakeholders contacted		
Type of Stakeholder (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	Stakeholder name / organization	Means of communication (e.g. face to face interview, email, phone interview, comment from public notice)
Governmental Department	Environmental Office of Pelalawan Regency Mr. Febrian (081275***)	Phone interview
	Department of Plantation Pelalawan Regency Mr. Zulkarnain (085365***)	Phone interview
	Department of Manpower of Pelalawan Regency: Mr. Syamsul Alam (081268***)	Phone interview
Communities	Head of Sei Berasberas Village Mr. Agus	Face to face interview
NGO	LSM Kabar Riau	Phone interview

	Mr. Rudi (0822*****)	
Union	Mr. Natangsa Sembiring (Chairman of KSPI – Ukui Estate)	Face to face interview
Internal	Secretaries of Gender Committee of Sei Lala Estate Ms. Dian Purnamasari	Face to face interview

Stakeholders comment	
1.	<p>Feedbacks: Department of Plantation Pelalawan Regency Mr. Zulkarnain (085365***)</p> <ul style="list-style-type: none"> Company has reported the plantation operation activities on regular basis to “Dinas Kehutanan dan Perkebunan Kabupaten Pelalawan Semester II 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. The price of FFB is set based on market prices, and the company is not bound by the price of FFB as stipulated in the “Riau Province FFB Price Setting Decision”, this is because the year of planting oil palm in Ukui has exceeded the planting year of the FFB Pricing in the Plantations. Based on reports, the PT Inti Indosawit Subur – Ukui I POM has a better price structure 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 still rumors regarding the implementation of replanting which is carried out independently using the BPDPKS program which is directly supervised by the Pelalawan Plantation Agency. <p>Audit Team verification and response: Company acknowledges the comment from Plantation Agency.</p> <ul style="list-style-type: none"> 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 FFB price for plants that are still not replanting (>25 years old) is determined and agreed using a market mechanism, this is because the FFB price is set by the Governor of Riau every 2 weeks, does not accommodate the FFB price for plants that are more than 25 years. Related to the implementation of replanting independently, however, PT IIS is still supervising it as well as directly from the Pelalawan Plantation Agency. After the replanting implementation is complete, the farmers have voluntarily declared to continue the partnership with PT IIS – Ukui Group. The replanting program in scheme smallholder was available during audit.
2.	<p>Feedbacks: Department of Manpower of Pelalawan Regency: Mr. Iskandar and Bpk Zul (0852***)</p> <ul style="list-style-type: none"> Generally, PT Inti Indosawit – Ukui Group has built good communication with Manpower and Transmigration Office – Pelalawan Regency.

	<ul style="list-style-type: none"> ▪ Compliance with laws and regulations, including: 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 are no issues related to violations of human rights, child labour, forced labor and discrimination at PT IIS – Ukui Group. ▪ There is no industrial relationship dispute occurred from the last year. <ul style="list-style-type: none"> - 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. ▪ Suggestion: so that existing PHL workers are immediately evaluated every 3 months as a probationary period.
	<p>Audit Team verification and response:</p> <p>The company received comments from the Department of Manpower as a positive response. The company will always maintain relationships and communication. The company has taken action in accordance with well-established procedures and persuasive approach, so there is no issue.</p> <p>Regarding the use of workers with PHL (Daily Worker) status, the Company has made a program known to the Pelalawan District Manpower and Transmigration Office. The realization and evaluation of the PHL employee appointment program to become permanent employees (SKUH) will always be monitored at every audit.</p>
<p>3.</p>	<p>Feedbacks:</p> <p>Environmental Office of Pelalawan Regency</p> <p>Mr Febrian (081275***)</p> <ul style="list-style-type: none"> • The company has established good communication and delivered periodic environmental management. • The company has an environmental document related to the development of biogas plant and kernel crushing plant. • The company has consistently reported on the environmental management: RKL-RPL Report, Hazardous Waste Management Report, <i>Land Application Report</i>. • PT Inti Indosawit Subur – Ukui I POM has performed environmental management in good manner. • Hazardous waste/LB3 monitoring report on Shelter Temporary (TPS) Hazardous waste/LB3 has been done. • The company has managed the hazardous waste, obtained permit for temporary storage – in accordance with relevant regulation. • There are no issues related to pollution in the Ukui Group plantation area. • There were no incidents of forest and land fires. • HCV management has been carried out properly so that it can be carried out consistently.

	<p>Audit Team verification and response: Company acknowledges the comment from Plantation Agency as positive responses.</p> <ul style="list-style-type: none"> • 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 <p>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.</p>
<p>4.</p>	<p>Feedbacks: Head of Sei Berasberas Village Mr. Agus</p> <ul style="list-style-type: none"> • Generally, communication between the village government or local community and company has been going well. • The company has always responded to each problem or issue submitted by government officials from village and surrounding communities. • The Company has implemented a CSR program to the local community and involves them in the CSR program planning process in each village. CSR program planning is always discussed with the village community through annual Musrebang activities. • Surrounding communities feel 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. • There are no issues related to human rights violations. • There are no issues related to child labor, forced labor, discrimination and workers' rights that have been granted in accordance with laws and regulations. • Maintenance of the village road which is the main road for transporting FFB of plasma farmers, maintenance has been carried out properly by involving the surrounding village community. <p>Audit Team verification and response: There is no further comment, and this is a positive comment for the company.</p> <ul style="list-style-type: none"> • 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. Access road maintenance FFB and CPO carried out scheduled, every 4 months once done using heavy equipment (motor grader) good maintenance or hoarding the road and compacter. In the dry season done watering the road every day (in the morning and evening).
<p>5.</p>	<p>Feedbacks: Chairman of Gender Committee of Ukui Estate Ms. Yuliana Syarifah Chairman of Labor Union of PUK SPPP.KSPSI Mr. Natangsa Workers of PT Inti Indosawit Subur – Ukui Group</p>

	<ul style="list-style-type: none"> • The company has realized Normative Rights of employees such as remuneration in accordance with applicable regulations, Allowance/THR, BPJS Program. • Legally SPSI members are 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 have 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 provides 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). • Until now, there has been no employee’s 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. • Commitment related to PHL workers; the company has implemented this policy through a PHL appointment program with a period of every 3 months.
	<p>Audit Team verification and response:</p> <p>For the positive things that have been done will be maintained and improved by the management to be better in the future.</p> <p>Company has made a program for the appointment of PHL workers to become SKUH, this program has also been known by the Pelalawan Regency Manpower and Transmigration Office. (As has been described in the comments of the Disnakertrasn of Pelalawan Regency above).</p> <p>The company has maintained good management of occupational and social policy, all feedback from workers union is positive as well as previous assessment, audit team acknowledge the positive feedback.</p> <p>Auditor Team Giving full attention to the program for the appointment of PHL workers to become SKUH, verification will always be carried out in accordance with the program that has been set and approved by the District Manpower and Transmigration Office. Pelalawan.</p> <p>The verification on the current audit has been carried out as stated in the audit report (indicator 6.2.7). Deviations / discrepancies in the realization of the program that has been determined by the company, will be noted by the auditor for immediate follow up.</p>
<p>6.</p>	<p>Feedbacks:</p> <p>LSM Kabar Riau Mr. Rudi (08228406****)</p> <ul style="list-style-type: none"> • Communication has been well established. • In the period 2022-2023; there are no issues related to the environment. • There are no issues related to human rights violations. • There are no land conflicts with the villagers around the plantations. • Employment has been carried out in accordance with applicable laws and regulations, wages, workers' rights have been given.

	<p>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.</p>
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List of landowner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
Nil	Nil	Nil	Nil	Nil	Nil
PT Inti Indosawit Subur – Ukui I POM was established since 1990 and has planting palm oil since 1990 and 1991. Currently the palm oil has been replanting since 2015.					

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

3.5 Impartiality and conflict of interest

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

Formal Signing-off of Assessment Conclusion and Recommendation

The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that PT Inti Indosawit Subur – Ukui I 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 I POM has is remain certified.

Report prepared by	Acceptance of Assessment Conclusion
Name: Nanang Rusmana	Name: Putu Grhyate Yonata Aksa
Company Name: PT BSI Group Indonesia	Company Name: PT Inti Indosawit Subur – Ukui POM
Title: Client Manager	Title: Sustainability Operation
Signature: 	Signature: <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i> 
Date: 28 July 2023	Date: 29 July 2023

Appendix A: Summary of Findings

Criterion / Indicator	Assessment Findings	Compliance	
<p>Principle 1: Behave ethically and transparently Drive ethical business behaviour, build trust and transparency with stakeholders to ensure strong and healthy relationships.</p>			
<p>Criteria 1.1: The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.</p>			
<p>1.1.1</p>	<p>(C) Management documents that are specified in the RSPO P&C are made publicly available. - Critical (Major) compliance -</p>	<p>PT Inti Indosawit Subur – Ukui Group has a set of publicly available documents in form of “<i>Daftar Dokumen dan Informasi Untuk Diakses Publik PT Inti Indosawit Subur</i>” updated on 16 February 2023. List of documents available for public from such as:</p> <ul style="list-style-type: none"> • Certificate of Land Rights/Cultivation Right in form 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. • Land title: SK Ka. BPN No: 156/HGU/BPN/2004, dated 11 November 2004. • Plan and Impact Assessment relating to Environmental and Social Impact - Environment, the company already has environmental permit/izin lingkungan as per “<i>Surat Keputusan Gubernur Riau No.976/X/2009 tanggal 28 Oktober 2009 tentang Dokumen Pengelolaan dan Pemantauan Lingkungan</i>”. • Social Impact Assessment has been conducted by independent consultant from “Fakultas Kehutanan Institut Pertanian Bogor” in July 2010. 	<p>Complied</p>

		<ul style="list-style-type: none"> • Plan and Impact Assessment relating to Environmental and Social Impact as in "Laporan-laporan Pelaksanaan RKL/RPL setiap semester". Last Report for 2nd Semester (July – December 2022) • Izin Penyimpanan Sementara Limbah B3 PT. Tolan Tiga Indonesia Kebun/PKS Perlabian - permit of Hazardous Waste Storage No. KTPS.503/DPMPTSP-LB3/2020/33 dated 29 December 2020. • Program Kesehatan dan Keselamatan Kerja – last document for year 2023 • Continuous Improvement Plan "Rencana Perbaikan Berkelanjutan" • Human Right Policy as in "Kebijakan Perusahaan" - outlined in the Corporate Policy issued by the Managing Director of Asian Agri on 1 December 2019. • Pollution and reduction plan "Rencana Pengurangan dan Pencegahan Polusi" • Public summary if the certification Assessment Report "Rangkuman Publik dan Laporan Hasil Sertifikasi" • Detail of Complaint and Grievance "Rekaman Keluh Kesah Internal dan Eksternal" - <i>SOP Penanganan Keluhan dari Eksternal</i> No. AA-GL-5005-R0 01" • "Prosedur Pemberian Tanggapan atas Permintaan Informasi - <i>SOP Penanganan Permintaan Informasi Stakeholder</i>" (SOP No. AA-GL-5008.1-RI, Rev. 1) dated 22 August 2011 • HCV identification report - 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 pada tahun 2010". • Plantation business progress report every 1-year period (plantation business progress report) 	
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		<ul style="list-style-type: none"> • Public Summary Report of RSPO and ISPO <p><u>Scheme Smallholder:</u> The Smallholder Manager has determined type of documents which can be accessed by public as “<i>Daftar Dokumen yang Dapat Di Akses (tahun 2022</i>” updated on 12 January 2023, that covers:</p> <ul style="list-style-type: none"> • Copies of Sertifikat Hak Milik (SHM) – and ownership certificate. • Group working Program. • HCV • Standard Operational Procedure of Good Agriculture Practices. Example: Procedure No. AA-APM-OP-1100.09-R3 <i>Pemupukan (Manuring)</i> dated 20 April 2015 and No. AA-PLASMA-PP-KS-04 <i>Potong Buah (Harvesting)</i> • Social Impact Assessment (SIA) • ICS Policy including Human rights policy, man powering, health, and safety - Group Manager has established the ICS Policy under “Kebijakan Group Manager” dated 3rd January 2023 • Social Activity Documents including CSR Report. • Local Development Documents. • Prices of Fresh Fruit Bunches • Public Summary Report of RSPO – last report for ASA 2.1-year 2022 • RAT document of Cooperative 	
1.1.2	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>From document verification, the document listed in 1.1.1 - “<i>Daftar Dokumen dan Informasi Untuk Diakses Publik PT Inti Indosawit Subur</i>” updated on 16 February 2023 and other operational document available in Bahasa Indonesia.</p> <p>Sample seen:</p>	Complied

		<ul style="list-style-type: none"> • Company policies available in Indonesia → check with sample workers, they understand the human rights policy, health, and safety policy. • Company operational procedures available in Bahasa Indonesia • Land title “Izin HGU”, Environmental Permit “ANDAL”, HCV identification, Social Impact Assessment document available in Bahasa Indonesia • Document on stakeholder complaint & grievance and record of complaint & grievance progress available in Bahasa Indonesia • Continuous Improvement program available in Bahasa Indonesia. • 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 → has been dissemination to all operation at workplace on 16 – 20 February 2023 <p>Its List provides in Bahasa Indonesia and the form can be understand with all stakeholders.</p> <p><u>Scheme Smallholder:</u> The Smallholder Manager has determined type of documents which can be accessed by public as “<i>Daftar Dokumen yang Dapat Di Akses (tahun 2022</i>” updated on 12 January 2023, as mentioned in 1.1.1. All the document provided in appropriate languages and accessible to relevant stakeholders. During interview with sample of smallholder member, they understand with the information of Publicly Document. Cooperative sample → KUD Bina Usaha Baru, KUD Sawit Subur, KUD Karya Bersama, KUD Usaha Baru</p>	
1.1.3	<p>(C) Records of requests for information and responses are maintained. - Critical (Major) compliance -</p>	<p>Provision of response to information request regulated in “<i>SOP Penanganan Permintaan Informasi Stakeholder</i>” (SOP No. AA-GL-5008.1-RI, Rev. 1) dated 22 August 2011. The procedure described that</p>	Complied

		<p>information request can be receive by oral or written, or by representative of communities; the company will respond 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.</p> <p>Record of information request and response/information logbook is maintained by company. Records of information are kept for minimum three (3) years.</p> <p>Data verified:</p> <ul style="list-style-type: none"> • Ukui I POM, dated 10 February 2023 → Ukui I POM received verbal request from KUD Bina Usaha Baru regarding request regarding FFB prices in February 2023, week 3. The response was on 16 February 2023 • Request information form Manpower Agency in Pelalawan Regency dated 6th March 2023 – document number: 560/DISNAKER2023/354, regarding: request for information related to the submission of mandatory manpower reports → the requested has been responded by the Humas (Public Relation Staff) on 10 March 2023 by submitting the Compulsory Manpower Report document for 2022. • Report of safety performance Q1 2023 "Laporan P2K3 Triwulan I Tahun 2023 No.04/UKUI-Grpup/1/2023 Ke Dinas Ketenagakerjaan Kabupaten Pelalawan" dated 16 April 2023. <p><u>Scheme Smallholder:</u></p> <p>Group Manager has demonstrated the record of requests for information and response in Logbook of "<i>Catatan Permintaan Informasi dan Tanggapan</i>". In 2023, there 5 information requests, e.g.:</p> <ul style="list-style-type: none"> • In KUD Sawit SUbur – sample for request for information from stallholder member (name: Mr S*r*tn*), dated 9 April 2023, regarding questions related road maintenance schedule. The response provides 	
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		<p>by Group Manger on 9 April 2023.</p> <ul style="list-style-type: none"> In KUD Karya Bersama – sample for request information form stallholder member (name: Mr K*st*b*) dated 20 April 2023, requests for Information on THR payment plan. The response was provided by Scheme Smallholder Manager on 20 April 2023. 	
<p>1.1.4</p>	<p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official.</p> <p>- Critical (Major) compliance -</p>	<p>Procedure for consultation and communication under “<i>Mekanisme Penanganan Permintaan Informasi Stakeholder</i>”, No. SOP; AA-GL-5008F.1-R1) dated 22 August 2011.</p> <p>The procedure described that:</p> <ul style="list-style-type: none"> Information request can be received by oral or written, or by representative of communities. The company will respond according to respective authorities, starts from Humas (public relation), Estate/Mill manager, Group Manager and Regional Office. The company responses against all information requests sent by stakeholders including response time of 14 working days after information request accepted. Record related to information request and company response kept and maintained for three (3) years. <p>Socialization of communication and consultation procedure and complaint and grievance handling mechanism to surrounding communities. Sample seen → the socialization meeting, dated 16 January 2023 attended by 12 communities and officials from Village of Air Hitam and Bagan Limau</p> <p><u>Scheme Smallholder</u></p> <p>The Group Manager has established mechanism for communication and consultation “<i>Prosedur Konsultasi dan komunikasi Didokumentasikan, Diungkap, Diimplementasikan Tersedia dan Dijelaskan Kepada Semua Stakeholder</i>” dated 4 January 2022, shaped flow Chart that describes the</p>	<p>Complied</p>

		<p>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.</p> <p>Each smallholder member has "<i>Buku Panduan dan Catatan Petani Plasma</i>", whereas explains the flow process of consultation and communication. Both of communication by written and verbal communication to group management are acceptable.</p>	
<p>1.1.5</p>	<p>An up-to-date list of contacts and detailed stakeholder information is available along with designated representatives.</p> <p>- Minor compliance -</p>	<p>PT Initi Indosawit SUbur – Ukui Group updates the list of contacts and detailed stakeholders. The list comprises of different stakeholders. The stakeholder list completed with name of chairman, address and contact number.</p> <p>List of stakeholders provided at "Daftar Stakeholder", last updated in February 2023. The list consisted of 32 stakeholders, 2 category of stakeholders i.e.:</p> <ul style="list-style-type: none"> • Internal: <ul style="list-style-type: none"> - Worker Union: - Committee Gender: • External <ul style="list-style-type: none"> - 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, Kebun Masyarakat (20 smallholders) - Informal institution around the company, e.g., FK-KPPS, GWKAK, Worker Union and WKAK. - NGO around the company e.g., WWF, Scale Up. - NGO (WWF, Scale Up) 	<p>Complied</p>

		<p><u>Scheme Smallholder:</u></p> <p>The updated the list of stakeholder’s year 2023, sample seen:</p> <ul style="list-style-type: none"> • Stakeholders from PT Inti Indosawit Subur – Ukui Group • Stakeholders from local government → District Head • Stakeholders related agency in Pelalawan Regency → Pelalawan Regency (Dinas Lingkungan Hidup, Dinas, Perkebunan, Dinas Tenaga Kerja, BPN). • Stakeholder from banks (6 stakeholders) • Stakeholder from KUD → Chairman of Koperasi Unit Desa (KUD) which under company scheme smallholder, Kebun Masyarakat (20 smallholders). <p>Cooperative sample → KUD Bina Usaha Baru, KUD Sawit Subur, KUD Karya Bersama, KUD Usaha Baru</p>	
<p>Criteria 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.</p>			
<p>1.2.1</p>	<p>A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.</p> <p>- Minor compliance -</p>	<p><i>There was no change related to the ethical conduct policy.</i></p> <p>PT Inti Indosawit Subur - Ukui Group has revised the company policy by including commitment to a code of ethical business conduct, it was signed by Managing Director on 1 December 2019.</p> <p>The code of conduct standards are the company internal guidelines for work ethics, commitment, and the enforcement of company internal guideline for work ethics, commitment and the commitment and the enforcement of company regulations for individuals when conducting business and other activities, as well as interacting with stakeholders. Basic attitudes of individuals, company employees will demonstrate: Compliance with company regulations, an ethical approach to their work, honesty and discipline at work, openness, and willingness to improve themselves, mutual respect and courtesy towards others, egalitarian attitudes and behaviour, willingness to be placed anywhere according to company requirements and prevailing conditions.</p>	<p>Complied</p>

		<p>The policy has been disseminated to all employees by installing signboard of company policy and by direct dissemination.</p> <p>In 2022 to 2023, PT Inti Indosawit Subur - Ukui Group was communicating the policy on code of ethical conduct to worker, village communities and contractors, such as:</p> <ul style="list-style-type: none"> • In Ukui I POM – the socialization was on 8 – 9 February 2023 – subject: training for company policy, that was attended by 64 workers. • In Ukui Estate – the socialization was on 2 – 5 February 2023 – subject: training for company policy, that was attended by 201 workers. <p>To ensure the implementation of the code of ethics, the auditor team conduct interviewed to labour union chairman and village heads around the companies operational. Based on the interviews obtained information that the employee recruitment process has been openly informed. The results of the recruitment procedure can be accessed by prospective employees and there is no charge for the whole process.</p> <p><u>Scheme Smallholder</u></p> <p>The Smallholder Manager already has a Code of Ethical Business Policy that included on “<i>Kebijakan Manajer Group ICS</i>” 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 “<i>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</i>”. And for refresh has been carried out on 23 November 2022.</p> <p>Document verification shows that all farmer members have stated approval of all policy issued by Smallholder Manager, including policy related to code of ethic which described in the Agreement Letter.</p>	
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		<p>Document seen Cooperative sample → KUD Bina Usaha Baru, KUD Sawit Subur, KUD Karya Bersama, KUD Usaha Baru have signed Cooperation.</p> <p>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.</p> <p>Based on interview with smallholders shows that they have a good understanding of the Code of Business Conduct policy issued by the Smallholder Manager.</p>	
<p>1.2.2</p>	<p>A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.</p> <p>- Minor compliance -</p>	<p>PT Inti Indosawit Subur – Ukui Group has shown the document to monitor compliance and the implementation of the policy and overall ethical business practice.</p> <p>The implementation through carried out internal audit against RSPO P&C on annual basis, covering indicator related to code of ethical conduct implementation in company operation and contractor:</p> <ul style="list-style-type: none"> • Internal Audit Report as per document Laporan Internal Audit ISPO & RSPO dated 15 – 17 January 2023 including Scheme smallholders/Plasma Ukui 1. • Implemented business conduct policy to all employees, it is repeated an in-employment contract with PKB employees' period 2021 – 2023. Describes on article XXII about "Kewajiban Perusahaan dan Pekerja"; these included: <i>Pengusaha dan pekerja berkewajiban memelihara budi pekerti yang baik dan tidak bertentangan dengan norma hukum dan nilai susila, Pengusaha dan pekerja berkewajiban mematuhi dan menjalankan segala peraturan</i> <p>PT Inti Indosawit Subur – 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.</p>	<p>Complied</p>

		<p>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.</p>	
<p>Principle 2: Operate legally and respect rights</p>			
<p>Implement legal requirements as the basic principles of operation in any jurisdiction.</p>			
<p>Criteria 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.</p>			
<p>2.1.1</p>	<p>(C) The unit of certification complies to relevant regulations. - Critical (Major) compliance -</p>	<p>The organization has provided a list of relevant laws and regulations and its compliance evaluation. The evaluation was conducted annually as per "Evaluasi Kepatuhan Peraturan Perundangan", the latest was updated in February 2023. No new regulation issued in 2022 so the latest regulations are:</p> <ul style="list-style-type: none"> • <i>Peraturan Pemerintah (PP) Nomor 5 Tahun 2021 regarding Penyelenggaraan Perizinan Berusaha Berbasis Risiko.</i> • <i>Peraturan Pemerintah (PP) Nomor 6 Tahun 2021 regarding Penyelenggaraan Perizinan Berusaha di Daerah.</i> • <i>Peraturan Pemerintah (PP) Nomor 20 Tahun 2021 regarding Penertiban Kawasan dan Tanah Terlantar.</i> • <i>Peraturan Pemerintah (PP) Nomor 22 Tahun 2021 regarding Penyelenggaraan Perlindungan dan Pengelolaan Lingkungan Hidup.</i> • <i>Peraturan Pemerintah (PP) Nomor 26 Tahun 2021 regarding Penyelenggaraan Bidang Pertanian.</i> • <i>Peraturan Pemerintah (PP) Nomor 31 Tahun 2021 regarding Penyelenggaraan Bidang Pelayaran.</i> • <i>Peraturan Pemerintah (PP) Nomor 35 Tahun 2021 regarding Perjanjian Kerja Waktu Tertentu, Alih Daya, Waktu Kerja dan Waktu Istirahat, dan Pemutusan Hubungan Kerja.</i> 	<p>Complied</p>

		<ul style="list-style-type: none"> • <i>Peraturan Pemerintah (PP) Nomor 36 Tahun 2021 regarding Pengupahan.</i> • <i>Peraturan Pemerintah (PP) Nomor 37 Tahun 2021 regarding Penyelenggaraan Program Jaminan Kehilangan Pekerjaan</i> <p>Based on evaluation, the organization has complied with the new regulations mentioned as above.</p> <p>Scheme Smallholders:</p> <p>Compliance with laws and regulations, especially related to scheme smallholder oil palm plantations, has been carried out through several obligations or permits that must be fulfilled, such land legality, organization establishment deed, tax ID and etc. In this surveillance audit, the samples of scheme smallholder were KUD Bina Usaha Baru (308 smallholders), KUD Sawit Subur (454 smallholders), KUD Karya Bersama (432 smallholders) and KUD Usaha Baru (247 smallholders) where all of them have their legal document.</p>	
<p>2.1.2</p>	<p>A documented system for ensuring legal compliance is in place. This system has means to track changes to the law and also includes listing and evidence on evaluation of legal compliance of all contracted third parties, such as: recruitment agencies, service provider and labour contractor.</p> <p>- Minor compliance -</p>	<p>Public affair department conducts annual evaluation of legal compliance. The last evaluation conducted in February 20223. No new regulation issued in 2022 so the latest regulations are:</p> <ul style="list-style-type: none"> • <i>Peraturan Pemerintah (PP) Nomor 5 Tahun 2021 regarding Penyelenggaraan Perizinan Berusaha Berbasis Risiko.</i> • <i>Peraturan Pemerintah (PP) Nomor 6 Tahun 2021 regarding Penyelenggaraan Perizinan Berusaha di Daerah.</i> • <i>Peraturan Pemerintah (PP) Nomor 20 Tahun 2021 regarding Penertiban Kawasan dan Tanah Terlantar.</i> • <i>Peraturan Pemerintah (PP) Nomor 22 Tahun 2021 regarding Penyelenggaraan Perlindungan dan Pengelolaan Lingkungan Hidup.</i> • <i>Peraturan Pemerintah (PP) Nomor 26 Tahun 2021 regarding Penyelenggaraan Bidang Pertanian.</i> 	<p>Complied</p>

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		<ul style="list-style-type: none"> • <i>Peraturan Pemerintah (PP) Nomor 31 Tahun 2021 regarding Penyelenggaraan Bidang Pelayaran.</i> • <i>Peraturan Pemerintah (PP) Nomor 35 Tahun 2021 regarding Perjanjian Kerja Waktu Tertentu, Alih Daya, Waktu Kerja dan Waktu Istirahat, dan Pemutusan Hubungan Kerja.</i> • <i>Peraturan Pemerintah (PP) Nomor 36 Tahun 2021 regarding Pengupahan.</i> • <i>Peraturan Pemerintah (PP) Nomor 37 Tahun 2021 regarding Penyelenggaraan Program Jaminan Kehilangan Pekerjaan</i> <p>Based on evaluation, the organization has complied to the new regulations as mentioned as above</p>	
2.1.3	<p>Legal or authorized boundaries are clearly demarcated and visibly maintained and there is no planting beyond these legal or authorized boundaries.</p> <p>- Minor compliance -</p>	<p>According to the national regulation, land title (HGU) holder shall maintain the condition of boundary poles. Based on field visit in Ukui Estate concluded that the boundary poles area well maintained.</p> <p>The boundary poles recorded in document "<i>Monitoring Pemeriksaan Patok Batas</i>". The poles monitored twice a year. The last monitoring held on 16 December 2022. All poles (59 unit) reported in good condition.</p> <p>For the scheme smallholders, during field visit has known that the boundaries poles are available. The KUD has carried out monitoring of boundary poles, the last monitoring was carried out in January 2023. There is no indication of dispute among the plots as well with external parties.</p>	Complied
<p>Criteria 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.</p>			
2.2.1	<p>A list of contracted parties is available.</p> <p>- Minor compliance -</p>	<p>In the 2022-2023 period, PT IIS- Ukui 1 has updated the list of contractors working with PT IIS, generally, there is no change from the previous period, including:</p> <ul style="list-style-type: none"> • PT Buana Jaya Bersama (CPO/PK/CPKO Transporter) • CV Jasa Sumber Asahan (CPO/PK/CPKO Transporter) 	Complied

		<ul style="list-style-type: none"> • CV Teman Setia (CPO/PK/CPKO Transporter) • CV Jaya Pertama (CPO/PK/CPKO Transporter) • CV Jaya Bersama (CPO/PK/CPKO Transporter) • CV Jasa Sahabat Abadi (CPO/PK/CPKO Transporter) • CV Sumber Kencana (CPO/PK/CPKO Transporter) <p>There are also empty bunch (EFB) transportation contractors in the Ukui Estate, namely:</p> <ul style="list-style-type: none"> • Empty bunch (EFB) transport contractor on behalf of Jaya Bagus which is a community of Desa Lubuk Kembang • Empty bunch (EFB) contractor (EFB) on behalf of Gunawan who is a community of Bagan Limau Village. <p>This list of contractors will have been verified through the Cooperation contract documents and minutes of payment for the latest work.</p> <p>Scheme Smallholder:</p> <p>There are several local contractors working with Plasma Ukui I, two TBS sports contractors. Based on documents verification and interviews with farmers and group managers, there are several contractors who have collaborated for plantation operations, for example:</p> <ol style="list-style-type: none"> 1. Letter of Work Agreement for Plasma Plantation FFB Transportation between KUD Bina Usaha Baru and FFB Transporter on behalf of Budi Waluyo (Bukit Jaya Village, Ukui District, Pelalawan Regency), no. 518/SPK/KUD-BUB/TBS/I/2023 dated January 4, 2023 2. Letter of Work Agreement for Plasma Plantation FFB Transportation between KUD Sumber Bahagia and FFB Transporter on behalf of Zulfika (Silikuan Hulu Village, Ukui District, Pelalawan Regency), no. 024/SPK/KUD-SB/TBS/I/2023 dated 3 January 2023. 	
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<p>2.2.2</p>	<p>All contract, including those for FFB supply, contain specific clause on meeting relevant legal requirements and this can be demonstrated by the third party.</p> <p>- Minor compliance -</p>	<p>During this onsite, auditor team has observed the supplier, which is Asosiasi Petani Swadaya Anugrah, Haluga and CV Harapan Kita (long term agreement). Based on document verification and interview with Create Share Value (CSV) staff obtained information that both suppliers have been verified and visited by FFB purchasing staff. By visited the suppliers land and tagged the coordinate, mill expected the FFB source comes from traceable and responsible area. The list of legal documents verified as follows:</p> <ol style="list-style-type: none"> 1) List of supplier member, 2) Coordinate and its overlay RTRW map, 3) Personal tax identification of Asosiasi Petani Swadaya Anugrah, 4) Business permit ID, 5) Trading permit ID, 6) Environmental permit, 7) Location permit 8) Registration of health insurance (BPJS Kesehatan) 9) Copy of bank account <p>Based on the agreement document (Contract cooperation agreement) that have been verified above, there are explanations on legal requirements, employment (including wages) and compliance with legislation and obligations to respect human rights and business ethics in article 1 No. 6-9; and No. 13 related to business ethics.</p> <p>During audit it has document verification obtained information, CSV Department has conducted area mapping for smallholders and independent suppliers before issuing recommendations for FFB suppliers to mills. Sighted the record of geolocation as per smallholders and supplier.</p>	<p>Complied</p>
<p>2.2.3</p>	<p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour.</p>	<p>The company has consistently implemented policies related to the prohibition of child labor, forced labor and worker trafficking.</p>	<p>Complied</p>

	<p>- Minor compliance -</p>	<p>All third-party contracts, suppliers (including FFB suppliers), vendors (CPO, Kernel, EFP and FFB transporters and others) are obligated with several special clauses such as:</p> <ul style="list-style-type: none"> • The company policy related to children/underage worker, anti-drugs etc. • Workers’ payment referred to local minimum payment’s regulation. • All workers will be register in health insurance and workers insurance according to national regulation. <p>The same regulations also apply in smallholder schemes. All contract data is kept by a plantation and mill administrator (KTU: Head of Administration).</p>	
<p>Criteria 2.3: All FFB supplies from outside the unit of certification are from legal sources.</p>			
<p>2.3.1</p>	<p>(C) For all directly sourced FFB, Palm Oil Mill (POM) requires:</p> <ul style="list-style-type: none"> • Information regarding the geolocation of FFB origins; • Proof of ownership status, right/claim of the land by grower/smallholder; • If relevant, valid planting/operational/trading license, or is part of a cooperative which allows the buying and selling of FFB. <p>- Critical (Major) compliance -</p>	<p>During ASA2_2 there is no changes related to supply chain module at Ukui I POM. Ukui I POM has chosen the Mass Balance Module.</p> <p>The supply bases are Ukui Estate, scheme smallholder (certified under Ukui I POM) and third parties (Asosiasi Petani Sawit Swadaya Amanah, Asosiasi Petani Sawit Swadaya Anugrah, Haluga, CV Harapan Kita, Haluga dan Budi.</p> <p>The scheme smallholders are KUD Sumber Makmur, KUD Bina Usaha Baru, KUD Bakti, KUD Karya Bersama, KUD Sawit Subur, KUD Bina Sejahtera, KUD Sumber Bahagia, KUD Bukit Potalo, and KUD Usaha Baru.</p> <p>The information related geolocation, proof of ownership status, and trading license for cooperative has shown during audit.</p>	<p>Complied</p>
<p>2.3.2</p>	<p>For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in indicator 2.3.1.</p> <p>- Minor compliance -</p>	<p>During ASA2_2 there is no changes related to supply chain module at Ukui I POM. Ukui I POM has chosen the Mass Balance Module.</p> <p>The indirectly sourced FFB for Ukui I POM are Air Hitam Jaya (AHJ) and Haluga.</p>	<p>Complied</p>

		<p>The information related geolocation, proof of ownership status, and trading license for cooperative has shown during audit. For Example:</p> <p>Air Hitam Jaya (AHJ):</p> <ul style="list-style-type: none"> Information regarding the geolocation of FFB origins; On behalf: Budiman, area 2.0 Ha, 0° 8' 26.4" S and 102° 3' 31.7" E Suwarto, area 1.5 Ha, 0° 8' 30.2" S and 102° 3' 22.7" E Tuhamid, area 9.32 Ha, 0° 7' 22.2" S and 102° 3' 29.0" E Proof of ownership status, right/claim of the land by grower/smallholder; Budiman – Sertifikat Hak Milik/SHM, Suwarto-Sertifikat Hak Milik/SHM and Tuhamid Sertifikat Hak Milik/SHM. Trading license: NIB 9120005462965 on behalf Koperasi Air Hitam Jaya (AHJ). <p>Haluga:</p> <ul style="list-style-type: none"> Information regarding the geolocation of FFB origins; On behalf: Junita Simanjuntak, area 2.0 Ha, 00°16'25.74" S and 102°06'22.99" E Hisar Lumban Gaol, area 2.0 Ha, 0° 8' 26.4" S and 102° 3' 31.7" E Aswin Lumban Gaol, area 2.00 Ha, 00°16'22.14" S and 102°06'10.99" E Proof of ownership status, right/claim of the land by grower/smallholder; Budiman – Sertifikat Hak Milik/SHM, Suwarto-Sertifikat Hak Milik/SHM and Tuhamid Sertifikat Hak Milik/SHM. Trading license: NIB 126-4000110563 on behalf Hamonangan Lumban Gaol. 	
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<p>Principle 3: Optimise productivity, efficiency, positive impact and resilience Implement plans, procedures and systems for continuous improvement.</p>
<p>Criteria 3.1: There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.</p>

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3.1.1	<p>(C) A business or management plan (minimum of three years) is documented and where applicable, includes a jointly developed business case for Scheme Smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>The Certificate Holder has five years' management plan covering Own Estate, Mill and Smallholder's scheme updated January 2023, as follow:</p> <p>1. Projection - FFB (MT)</p> <table border="1" style="width: 100%; border-collapse: collapse; margin-bottom: 10px;"> <thead> <tr> <th rowspan="2">Unit</th> <th rowspan="2">Actual (Jan-Dec 2022)</th> <th colspan="5">Budget</th> </tr> <tr> <th>2023</th> <th>2024</th> <th>2025</th> <th>2026</th> <th>2027</th> </tr> </thead> <tbody> <tr> <td>Ukui Estate</td> <td>79,361</td> <td>79,361</td> <td>82,568</td> <td>86,786</td> <td>92,881</td> <td>86,150</td> </tr> <tr> <td>KUD Sumber Makmur</td> <td>21,462</td> <td>21,462</td> <td>21,665</td> <td>21,243</td> <td>21,040</td> <td>20,634</td> </tr> <tr> <td>KUD Bina Usaha Baru</td> <td>15,924</td> <td>15,924</td> <td>16,096</td> <td>16,977</td> <td>17,420</td> <td>17,642</td> </tr> <tr> <td>KUD Bakti</td> <td>8,252</td> <td>8,252</td> <td>8,207</td> <td>7,849</td> <td>7,804</td> <td>8,176</td> </tr> <tr> <td>KUD Karya Bersama</td> <td>16,036</td> <td>16,036</td> <td>15,820</td> <td>15,733</td> <td>18,325</td> <td>19,319</td> </tr> <tr> <td>KUD Sawit Subur</td> <td>15,836</td> <td>15,836</td> <td>15,155</td> <td>15,100</td> <td>15,382</td> <td>14,755</td> </tr> <tr> <td>KUD Bina Sejahtera</td> <td>21,951</td> <td>21,951</td> <td>22,038</td> <td>21,630</td> <td>21,420</td> <td>21,000</td> </tr> <tr> <td>KUD Sumber Bahagia</td> <td>16,529</td> <td>16,529</td> <td>16,539</td> <td>14,815</td> <td>14,477</td> <td>14,138</td> </tr> <tr> <td>KUD Bukit Potalo</td> <td>9,737</td> <td>9,737</td> <td>9,831</td> <td>9,643</td> <td>9,549</td> <td>9,366</td> </tr> <tr> <td>KUD Usaha Baru</td> <td>7,415</td> <td>7,415</td> <td>7,486</td> <td>7,344</td> <td>7,273</td> <td>7,131</td> </tr> <tr> <td>Total</td> <td>212,502</td> <td>215,404</td> <td>217,121</td> <td>225,572</td> <td>218,312</td> <td>212,502</td> </tr> </tbody> </table> <p>2. Production – CPO/PK (MT)</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Description</th> <th>Actual (Jan-Dec 2022)</th> <th>2023</th> <th>2024</th> <th>2025</th> <th>2026</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Unit	Actual (Jan-Dec 2022)	Budget					2023	2024	2025	2026	2027	Ukui Estate	79,361	79,361	82,568	86,786	92,881	86,150	KUD Sumber Makmur	21,462	21,462	21,665	21,243	21,040	20,634	KUD Bina Usaha Baru	15,924	15,924	16,096	16,977	17,420	17,642	KUD Bakti	8,252	8,252	8,207	7,849	7,804	8,176	KUD Karya Bersama	16,036	16,036	15,820	15,733	18,325	19,319	KUD Sawit Subur	15,836	15,836	15,155	15,100	15,382	14,755	KUD Bina Sejahtera	21,951	21,951	22,038	21,630	21,420	21,000	KUD Sumber Bahagia	16,529	16,529	16,539	14,815	14,477	14,138	KUD Bukit Potalo	9,737	9,737	9,831	9,643	9,549	9,366	KUD Usaha Baru	7,415	7,415	7,486	7,344	7,273	7,131	Total	212,502	215,404	217,121	225,572	218,312	212,502	Description	Actual (Jan-Dec 2022)	2023	2024	2025	2026							Complied
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3.1.2	<p>An annual replanting programme projected for a minimum of five years with yearly review, is available.</p> <p>- Minor compliance -</p>	<p>During ASA2_2 audit, the unit of certification was able to demonstrate annual replanting program for Y2023 – 2027 dated 1 January 2023. Based on document review, the record of replanting program as follows:</p> <table border="1"> <tr> <td>Year</td> <td>Area (Ha)</td> </tr> <tr> <td>2023</td> <td>-</td> </tr> <tr> <td>2024</td> <td>262</td> </tr> <tr> <td>2025</td> <td>295</td> </tr> <tr> <td>2026</td> <td>319</td> </tr> <tr> <td>2027</td> <td>330</td> </tr> </table>	Year	Area (Ha)	2023	-	2024	262	2025	295	2026	319	2027	330	Non-compliance																																										
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	Total	1,206				
Scheme smallholders:						
Replanting program period Y2023 - 2027						
KUD	2022	2023	2024	2025	2026	2027
Sumber Makmur	-	806	-	756	-	-
Bina Usaha Baru	-	144	-	-	-	-
Karya Bersama	422	-	-	-	-	-
Sawit Subur	-	200	170	-	-	-
Bina Sejahtera	574	-	662	-	-	-
Sumber Bahagia	302	482	-	-	-	-
Bukit Potalo	-	-	-	-	-	494
Usaha Baru	-	-	-	-	-	494
Bakti	-	-	448	-	-	-
<p>The realization of replanting program Y2023 (Semester 1) in scheme smallholder is 64 Ha at KUD Karya Bersama. The record that has verified for example <i>Berita Acara Kegiatan dan Surat Perjanjian Kerjasama Pekerjaan Replanting</i> KUD Karya Bersama.</p>						
Non-Conformance:						
<p>Plasma Ukui Group (Ukui I) already has and established a replanting program, however during field verification it was found that farmer plots were carrying out replanting (under planting) independently and not in accordance with the established replanting provisions.</p>						

		<p>Objective Evidence: Based on the results of a field visit to a sample of Ukui I Plasma plots, it was found that farmers carried out independent replanting by means of under planting outside of the replanting program that has been set by the Plasma Management and KUD, namely in the KUD Bina Usaha Baru there were 4 plots.</p>	
<p>3.1.3</p>	<p>The unit of certification holds management review at planned term according to the scale and nature of the activities undertaken. - Minor compliance -</p>	<p>The unit of certification holds management review at planned term according to the scale and nature according to the SOP No: AA-SOP-ES-6001-R5 dated 1 August 2020. Management review has conducted on 13 March 2023, attended by Group Manager, Mill Manager, Head Assistant, Field Assistant, KTU and Sustainability Assistant. The management review has discussed:</p> <ul style="list-style-type: none"> - Result of RSPO Internal Audit for Estate and Mill that conducted on 6-11 March 2023; e.g. OHS and maintenance of list of regulation (new regulation). - Customer feedback: There is no complaint from customer for period Y 2022 External complaint has been resolved by management in accordance with SOP Communication. - Preventive & Corrective Action: conducted evaluation to all regulation; carried out follow up action from the result of internal audit. <p>Management review also explained the achievement of the company for example: the training needed for the human resources. The management review stipulated in the procedure "AA-SOP-ES-6001-R5 dated 1 August 2020". The latest management review at Ukui I POM was conducted on 13 March 2023 and attended by 15 persons. During the onsite audit, auditor team also verifying the record of internal audit/visit. Sighted the record of visit in each unit as follows:</p> <p>Ukui Estate: Report No. VA-KUK-AUG-FULL-15082022, date of visit 15-21 August 2022. There were issues related to pruning, pest and diseases, drains, roads,</p>	<p>Complied</p>

		<p>supporting facilities (workshop), nursery, and worker housing. The estate has taken follow up actions to close out the issues.</p> <p>Ukui I POM: Report No. VE-PUS-AUG-FULL-01-2022-Full Visit, date of visit in July 2022. There were no main issues in this visit. However, there were a key issue related to oil losses and wastewater treatment. All the issues have been corrected by management unit.</p> <p>Scheme smallholders: There was a record of Deputy Head of Smallholder in December 2022. Based on the minutes of meeting, Coordinator Smallholder Region 2 has captured the issues related to:</p> <ul style="list-style-type: none"> • Replanting program • Implementation of Best Management Practises. <p>Each smallholder association has had annual monitoring activity to ensure annual target in line with the implementation. Sighted monitoring inspection of plot conditions document year 2022_KUD Sumber Bahagia, KUD Bina Usaha Baru, KUD Sawit Subur and KUD Karya Bersama. The parameters to be monitored was manuring, harvesting, weeding in circle, pruning and frond stacking.</p>	
<p>Criteria 3.2: The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.</p>			
<p>3.2.1</p>	<p>(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impact and opportunities of the unit of certification.</p> <p>- Critical (Major) compliance -</p>	<p>Based on document review and interview to the management during ASA2.2, it was known that to increase work productivity, the company always creates new improvements with the hope that the company's operational activities will be more efficient.</p> <p>Ukui Estate: One of the efforts to increase crop productivity is by "Improving Road Quality by Modifying Cross Drain" The objective is All Paths Accessible,</p>	<p>Complied</p>

		<p>longer cross drain replacement/repair lifetime and Longer cross drain replacement/repair lifetime.</p> <p>Ukui I POM:</p> <p>Ukui I POM has compiled improvements to Increase CPKO OER from 43.41% to 44.10%. Several important points related to this improvement include:</p> <ul style="list-style-type: none"> • Reduce reactive maintenance. • Improve availability. • Reduce inventory. • Standardized operational process. • Reduce losses. <p>The organization has also conducted continues improvement which based on consideration of the main social and environmental impact and opportunities of the unit of certification. The activity namely maintenance of village roads on a priority scale with "batu perun", not waiting for requests for assistance from the community. This is to prevent social and environmental impacts from the company's operational activities.</p>	
3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat by Certification Body during Annual Surveillance Assessment by using the RSPO metrics template.</p> <p>- Minor compliance -</p>	<p>RSPO Annual Communication of Progress 2020 of PT Inti Indosawit Subur has been available in RSPO website under membership number 1-0022-06-000-00. At the time of the audit, the RSPO Metrics template was submitted.</p>	Complied
<p>Criteria 3.3: Operating procedures are appropriately documented, consistently implemented and monitored.</p>			
3.3.1	<p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p>Ukui Estate:</p> <p>Estate has had Standard Operational Procedures (SOP) that covering entire operational activity as follows:</p> <ul style="list-style-type: none"> • SOP AA-APM-OP-1100.01-R4 dated 5 September 2016: <i>Pembibitan</i> 	Complied

		<p>(Nursery).</p> <ul style="list-style-type: none"> • SOP AA-APM-OP-1100.02-R3 dated 10 June 2015: <i>Penanaman Areal Baru</i> (New Planting). • SOP AA-APM-OP-1100.03-R2 dated 24 July 2015: <i>Pembuatan dan Perawatan Jalan dan Jembatan</i> (Road and Bridge construction and maintenance); • SOP AA-APM-OP-1100.04-R3 dated 7 Decmeber 2015: <i>Pembuatan dan Pemeliharaan Parit</i> (Drainage Construction and Maintenance). • SOP AA-APM-OP-1100.05-R3 dated 23 November 2016: <i>Konservasi Tanah dan Air</i> (Soil & Water Conservation). • SOP AA-APM-OP-1100.06-R6 dated 16 February 2017: <i>Menanam kacang</i> (Planting cover crops). • SOP AA-APM-OP-1100.07-R6 dated 16 February 2017: <i>Menanam Kelapa Sawit</i> (Planting Oil Palms). • SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i> (Weed control). • SOP AA-APM-OP-1100.09. R5 dated 26 December 2018: <i>Pemupukan</i> (Fertilizer application). • SOP AA-APM-OP-1100.10. R6 dated 23 November 2016: <i>Pengendalian Hama dan Penyakit</i> (Pests & Disease Control). • SOP AA-APM-OP-1100.11. R1 dated 1 February 2009: <i>Pestisida dan Pengendaliannya</i> (Pesticide Handling). • SOP AA-APM-OP-1100.12. R3 dated 23 November 2016: <i>Kastrasi</i> (Palm castration) explain cutting all generative product (mal flower, female flower, all fruit, to support vegetative growth) – done 5-6 months before being harvested. • SOP AA-APM-OP-1100.13. R3 dated 4 March 2016: <i>Tunas Pokok</i> (Pruning). • SOP AA-APM-OP-1100.14. R3 dated 16 February 2017: <i>Sensus dan</i> 	
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		<p><i>Identifikasi Pokok</i> (Census and Palm Identification).</p> <ul style="list-style-type: none"> • SOP AA-APM-OP-1100.15. R2 dated 1 October 2010: <i>Sensus Produksi</i> (Production Census). • SOP AA-APM-OP-1100.16. R1 dated 1 February 2009: <i>Konsolidasi Pohon Tumbang</i> (Provision of Support to Fallen Palm). • SOP AA-APM-OP-1100.17. R1 dated 23 October 2014: <i>Pengelolaan Air</i> (Water Management). • SOP AA-APM-OP-1100.18.R3 dated 20 April 2015: <i>Potong Buah</i> (Harvesting). • SOP AA-APM-OP-1100.19.R1 dated 1 February 2009: <i>Pengelolaan Transport</i> (FFB Transport). • SOP AA-APM-OP-1100.20-R6 dated 1 May 2019: <i>Peremajaan</i> (Replanting). <p>Until ASA2_2, there is no change related to the SOP.</p> <p>Ukui I POM has documented and implemented procedure related to process of FFB to become CPO and PK, starts from FFB receiving to dispatch of CPO and PK:</p> <ol style="list-style-type: none"> 1. SOP AA-MPM-OP-1400.02.R2 dated 1 September 2011: <i>Stasiun Penerimaan</i> for FFB Receiving Station; 2. SOP AA-MPM-OP-1400.03.R1 dated 1 February 2009: <i>Stasiun Rebusan</i> for Sterilizer; 3. SOP AA-MPM-OP-1400.04.R1 dated 1 February 2009: <i>Stasiun Pemisahan Berondolan</i> for Loose Fruit Separation; 4. SOP AA-MPM-OP-1400.05-R1 dated 1 February 2009: <i>Stasiun Pengadukan dan Pengempaan</i> for Pressing Station; 5. SOP AA-MPM-OP-1400.06-R1 dated 1 February 2009: <i>Stasiun Pemurnian</i> for Clarification; 6. SOP AA-MPM-OP-1400.07-R1 dated 1 February 2009: <i>Stasiun</i> 	
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		<p><i>Pemisahan Nut dan Fiber</i> for Nut and Fiber Separation;</p> <ol style="list-style-type: none"> 7. SOP AA-MPM-OP-1400.08-R1 dated 1 February 2009: <i>Stasiun Kernel</i> for Kernel Station; 8. SOP AA-MPM-OP-1400.09-R1 dated 1 February 2009: <i>Stasiun Boiler</i>; 9. SOP AA-MPM-OP-1400.10-R1 dated 1 February 2009: <i>Stasiun Engine Room</i>; 10. SOP AA-MPM-OP-1400.11-R1 dated 1 February 2009: <i>Stasiun Water Treatment</i>; 11. SOP AA-MPM-OP-1400.12-R1 dated 1 February 2009: <i>Laboratorium</i>; 12. SOP AA-MPM-OP-1400.13-R1 dated 1 February 2009: <i>Stasiun Pengelolaan Limbah</i> for Palm Oil Mill Effluent Treatment; 13. SOP AA-MPM-OP-1400.14-R2 dated 1 September 2011: <i>Stasiun Penimbunan dan Pengiriman CPO dan Kernel</i> for CPO and PK Bulking and Despatch Operation; 14. SOP AA-MPM-OP-1400.15-R1 dated 1 February 2009: <i>Perawatan</i> for Preventive Maintenance; 15. SOP AA-MPM-OP-1400.19.R2 dated 1 September 2011: <i>Manajemen dan Metode Menghitung Emisi Gas Rumah Kaca (GHG)</i> 16. SOP AA-MPM-OP-1400.18-R4 Book Keeping. 17. AA-MPM-OP-1400.17-R6 Traceability <p>Those documents above are available in each unit. Until ASA2_2, there is no change related to the SOP.</p> <p>Scheme Smallholder:</p> <p>Scheme smallholder has had best management practices procedure as follows:</p> <ul style="list-style-type: none"> • AA-PLASMA-PP-KS-01 <i>Pembibitan</i> (Nursery) • AA-APM-OP-1100.09-R3 <i>Pemupukan</i> (Manuring) dated 20 April 2015 	
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		<ul style="list-style-type: none"> • AA-PLASMA-PP-KS-04 <i>Potong Buah</i> (Harvesting) • AA-PLASMA-PP-KS-05 <i>Pengangkutan TBS</i> (FFB Transport) • AA-APM-OP-1100.10-R5 <i>Pengendalian Hama dan Penyakit</i> (Pest and Disease Control) dated 11 January 2016 • AA-APM-OP-1100.20-R5 <i>Peremajaan</i> (Replanting) dated 4 March 2016 • AA-MM-508-1-RO <i>Penerimaan TBS Plasma</i> (FFB Plasma Receiving) 1 September 2015 • AA-MM-508-2-RO <i>Penentuan Taksasi TBS Plasma</i> (FFB Plasma Estimation) • AA-APM-OP-1100.8-R5 <i>Pengendalian Gulma</i> (Weed Control) • AA-FA-220-2-RO <i>Stempel (Stamp)</i> • AA-MPM-OP-1400-17-R6 <i>Ketertelusuran</i> (Traceability) dated 1 September 2017 • AA-APM-OP-1100.02-R3 <i>Penanaman Area Baru</i> (New Planting) • AA-SOP-ES-6001-R4 <i>Audit Internal Sustainability</i> (Internal Audit Sustainability) • AA-KL-12-EFP <i>Restorasi Riparian dan Areal di Sekitar Danau/Waduk dan Mata Air Lainnya</i> (Restoration of Riparian Area or Near Area of Lake/Damp or Water Sources) dated 1 August 2010 • AA-HR-305.2-RO <i>Rekrutmen dan Seleksi Karyawan</i> (Recruitment and Selection of Employee). <p>Until ASA2_2, there is no change related to the SOP.</p> <p>During ASA2_2, auditor has conducted field visit to the Ukui Estate as follows:</p> <ul style="list-style-type: none"> • Harvesting in Block C89c Afdeling 3 Ukui Estate. The implementation was in accordance with SOP, the harvester can demonstrate the best 	
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		<p>management practices for harvesting and also safety working procedure.</p> <ul style="list-style-type: none"> • Barn owl box Block C89b Afdeling 3 Ukui Estate. The management unit using natural predator to control rat infestation. • Chemical weeding, Block C89d Afdeling 4 Ukui Estate. Circle and path, using micron herby (VVLV), pesticides applied is Supremo 480 SL (isopropyl amina glifosat) and Metaprima (metil metsulfuron). The implementation was good, the sprayers can demonstrate the best management practices for spraying activities and also safety working procedure. • Fertilizer application Block D16c Afdeling 4 Ukui Estate According to fertilizer recommendation, Ukui Estate conducted fertilizer application using MOP with dosage 1.75 kg/palm. The fertilizer applicator can demonstrate the application and safety working procedure. • EFB application Block C89aa Afdeling 4 Ukui Estate. 	
<p>3.3.2</p>	<p>A mechanism to check consistent implementation of procedures is in place. - Minor compliance -</p>	<p>Based on document verification during ASA2_2, it was known that to ensuring field implementation consistent with procedures, organization has a mechanism such as:</p> <ul style="list-style-type: none"> • 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 Ukui Estate in April 2023 that attended by group manager, estate manager, field assistant and head clerk. <p>Some issues during the VA/VE visit recorded in the report as follows: Ukui Estate:</p>	<p>Complied</p>

		<p>Report No. VA-KUK-AUG-FULL-15082022, date of visit 15-21 August 2022. There were issues related to pruning, pest and diseases, drains, roads, supporting facilities (workshop), nursery, and worker housing. The estate has taken follow up actions to close out the issues.</p> <p>Ukui I POM: Report No. VE-PUS-JUL-FULL-01-2022-Full Visit, date of visit in July 2022. There were no main issues in this visit. However, there were a key issue related to oil losses and wastewater treatment.</p> <p>All the issues have been corrected by management unit.</p>	
<p>3.3.3</p>	<p>Records of monitoring and any actions taken are maintained and available.</p> <p>- Minor compliance -</p>	<p>Certificate holder has maintained the records of monitoring and any actions taken; the record has shown during ASA2_2 audit. Verified samples for example the organization has conducted monitoring of operational activity in all levels of workers. Each field supervisor has equipped with monitoring sheets/worksheets. For example, harvesting supervisor collects harvesting record and quality of each harvester. The report submitted to estate manager daily, verified document namely "Formulir Pemeriksaan Ancak Pemanen" for period April 2023.</p> <p>For Ukui I POM, daily operational activities are also recorded in daily worksheet by mill supervisor before reported to the Mill Manager.</p> <p>To ensure the result of operational activity are in line with the procedures, mill/estate manager conducted regularly monitoring of and management review to solve the findings issues. All results of management review shall be implemented by respective staff.</p>	<p>Complied</p>
<p>Criteria 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.</p>			
<p>3.4.1</p>	<p>(C) SEIA in new planting or operation including mills, is conducted independently and participatively by involving the affected stakeholders, inclusive of impact assessment from the</p>	<p>There are no changes regarding EIA and SIA assessment document compared to last year audit. Updating data or information about the monitoring report and its reporting to government.</p> <p><u>Environmental Impact Assessment:</u></p>	<p>Complied</p>

	<p>smallholder/outgrower scheme (if any). The assessment is to be documented.</p> <p>- Critical (Major) compliance -</p>	<p>The environmental impact analysis documented in ANDAL, RKL RPL has 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 (<i>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</i>). 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.</p> <p>EIA document has included the impacts of any smallholder/outgrower scheme. PT Inti Indosawit Subur – Ukui Group has increased the mill capacity in 2009, Social Environmental Impact Assessment for mill capacity increase has been conducted and presented in “<i>Dokumen Pengelolaan dan Pemantauan Lingkungan Hidup (DPPL) Peningkatan kapasitas PMKS dan Sarana Pendukung PT Inti Indosawit Subur Kebun Uku</i>”. DPPL document has been approved by Riau Governor as per “<i>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 Uku untuk Kebun Inti dan Kebun Plasma dengan Kapasitas Uku I POM (90 ton TBS/jam) dan Uku I (75 ton TBS/jam)</i>”, dated 28/10/2009. SEIA for mill capacity increase was performed by independent consultant PT Holistika Primagrahita, consist of the professional and competent assessor.</p> <p>Environmental impact assessment covered in ANDAL, RKL RPL document and environmental aspect and impact, e.g.:</p> <p><u>Preconstruction:</u></p> <ul style="list-style-type: none"> • Employee recruitment. 	
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		<ul style="list-style-type: none"> • Construction. • Nursery. • Land clearing and planting preparation. • Infrastructure and supporting facility construction and development. • Land preparation. • Imature Palm oil plant upkeeping. • Mill location planning. • Palm Oil Mill construction. <p><u>Operation:</u></p> <ul style="list-style-type: none"> • Mature plantation upkeeping. • Soil and water conservation. • Land application (wastewater 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. • Wastewater processing. • Replanting. • Partnership cooperation. <p><u>Social Impact Assessment:</u></p> <p>Social Impact Assessment was conducted by independent consultant from "Fakultas Kehutanan Institut Pertanian Bogor" in July 2010.</p>	
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		<p>The SIA method was taken by participatory ways and involving the affected stakeholder at study location in 19 villages consist of 11 villages at Pelalawan Regency and 8 Villages at Indragiri Hulu Regency.</p> <p>Social Environmental impact assessment was conducted through regular environmental monitoring, e.g. river water quality, mill effluent quality, air emission, economical condition, social and culture of community and wildlife conservation.</p> <p>Social Environmental monitoring and management report reported in regular basis each semester in "Laporan Pelaksanaan Izin Lingkungan". Report semester I (Period January – June 2022) and Semester II (Period July – December 2022) has been sent to the government. Evidence of report submission can be demonstrated in "Daftar Distribusi Eksternal" and "Tanda terima Elektronik Sistem Informasi Pelaporan Elektronik Lingkungan Hidup (SIMPEL) KLHK" with ID 1679383869-1745 for Semester 1/2022 and ID 1684390210-1745 for Semester II/2022.</p> <p><u>Scheme Smallholder</u></p> <p>Social Environmental Impact Assessment of Ukui Plasma has included in AMDAL document (<i>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</i>).</p> <p>SEIA identified the significant potential environmental impacts deriving from operational activities such as land clearing, land development and road construction at palm oil plantations.</p> <p>Smallholder management also provide update SEIA for smallholder operation as per "Penilaian Dampak Sosial dan Lingkungan (SEIA) Kebun Plasma Ukui Tahun 2021". Smallholder manager has identified the social aspect and impact has identified such as:</p> <ul style="list-style-type: none"> • Consistency of company for villages development 	
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		<ul style="list-style-type: none"> • Company responsibility for road maintenance • Replanting activity • Harvesting and FFB transportation: air pollution and road condition, FFB stealing, FFB quality • FFB pricing mechanism • Labor recruitment and • Land legality <p>Another Environmental aspect and impact evaluation was also conducted as per "Evaluasi Aspek – Dampak Lingkungan" EMS-431-002-LT updated in January 2023.</p>	
<p>3.4.2</p>	<p>For the unit of certification, a SEIA is available and social and environmental management plan and its monitoring have been developed with participation of affected stakeholders.</p> <p>- Minor compliance -</p>	<p>There are no changes regarding EIA and SIA assessment document compared to last year audit. Updating data or information about the monitoring report and its reporting to government.</p> <p>Social Environment management and monitoring plan document is available in Environmental management plan (<i>RPL-Rencana Pengelolaan Lingkungan</i>) document. Document was approved by Governor Riau as per "Surat Keputusan Gubernur Riau No.976/X/2009 dated 28 October 2009 tentang <i>Dokumen Pengelolaan dan Pemantauan Lingkungan</i>. Environmental management based on document includes:</p> <ul style="list-style-type: none"> • Air quality and noisy management from FFB processing performed by installing the emission monitoring facility in the boiler and genset stack; installing safety in boiler stack, install the cyclone and dust trap in boiler stack, control the emission, controlling fuel efficiency, emission measurement of vehicle, boiler and generator, standard 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 tahun 2001. Performed by create terracing, land cover crop planting in open area and sloping area, organic fertilizer 	<p>Complied</p>

		<p>usage, natural predator usage for pest control, operating IPAL, land application, flat bed maintenance in land application area, housekeeping implementation and proper waste handling.</p> <ul style="list-style-type: none"> • 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 was publish to surrounding village, FFB purchasing from local plantation surrounding company, coaching and conseling to plasma member, CSR programme implementation. <p>Social Environmental monitoring and management report reported in regular basis each semester in "Laporan Pelaksanaan Izin Lingkungan". Report semester I (Period January – June 2022) and Semester II (Period July – December 2022) has been sent to the government. Evidence of report submission can be demonstrated in "Daftar Distribusi Eksternal" and "Tanda terima Elektronik Sistem Informasi Pelaporan Elektronik Lingkungan Hidup (SIMPEL) KLHK" with ID 1679383869-1745 for Semester I/2022 and ID 1684390210-1745 for Semester II/2022.</p>	
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		<p><u>Scheme Smallholder:</u></p> <p>Ukui Smallholder has developed the social environment management and monitoring plan as per “Rencana Kelola Sosial Terkait Aspek Permasalahan Sosial Kebun Plasma Ukui”, covering:</p> <ul style="list-style-type: none"> • Villages development, PT 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 provides the assistance of heavy equipment (grader, compactor, bacholader) for road maintenance. • Replanting activity, company propose the replanting plan program for smallholder plantation and socialize to smallholder member. • Post-replanting activities, company monitor the replanting process and its treatment until harvesting. • 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 	
<p>3.4.3</p>	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in participatory way. - Critical (Major) compliance -</p>	<p>There are no changes regarding EIA and SIA assessment document compared to last year audit. Updating data or information about the monitoring report and its reporting to government.</p> <p>Based on Government Regulation No. 27/2012 concerning Environmental Permits Article 53 (1) and (2) states that the person in charge of business must prepare a report and submit a report on the implementation of environmental management activities every 6 months. This reporting</p>	<p>Complied</p>

		<p>period is still in accordance with the latest regulations (Government Regulation No. 22 of 2021 concerning Implementation of Environmental Protection and Management, Article 49 (6.f.6)).</p> <p>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:</p> <ul style="list-style-type: none"> • Air quality and noisy monitoring from FFB processing performed by emission measurement against Boiler and generator each semester, ambient air quality measurement each semester, noisy measurement (indoor and outdoor) each semester, odor measurement each semester. • Air emission quality in Ukui II POM analyze by PT. ITEC Soution Indonesia for Semester I (January – June) 2022 and Semester II (July – December) 2022. The analysis results 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. Perfomed by wastewater quality monitoring each month, hazardous waste monitoring, land application monitoring, surface water quality monitoring each semester. Wastewater quality monitoring analyse by PT. ITEC Soution Indonesia. Wastewater analysis result since January – December 2022 shown comply with regulation. • Surface water quality test (Sungai Pematang River and Air hitam river upstream and downstream) analyze by PT. ITEC Soution Indonesia for Semester I (January – June) 2022 and Semester II (July – December) 2022. The analysis result from January – December 2022 shown comply with regulation. 	
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		<ul style="list-style-type: none"> • Soil quality monitoring performed by soil sampling analysis in "rorak, antar rorak and lahan control", EFB application monitoring, groundwater analysis each year. 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 2022 shown erosion level average below 6 ton/ha/year for Estate categorized as very good criteria. • Flora fauna monitoring performed by wildlife monitoring and monitoring the conservation area each month. Based on monitoring shown that there were species of mammal presence (<i>Macaca fascicularis</i>, <i>Macaca nemestrina</i>, <i>Calosciurus notatus</i>, <i>Sus crofa</i>, <i>Rattus sp</i>, <i>Felis bengalensis</i>, <i>Paradoxurus sp</i>), 13 species of birds (such as: <i>Halcyon smyrnensis</i>, <i>Rhipidura javanica</i>, <i>Centropus bengalensis</i>, <i>Pycnonotus aurigaster</i>), 4 species of reptile (<i>Varanus salvator</i>, <i>fejevarya sp</i>, <i>Mabouya sp</i>, <i>Denrelaphis caudolineatus</i>). • Community perception monitoring performed by community interview, employee data monitoring, interview with village head or public figure regarding their perception to company. Company has monitored the public perception through questioner each year. 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 2022, questioner of public perception can be demonstrated and well documented in RKL-RPL report semester II 2022. Generally public perception was positive regarding the company presence and contribution to the surrounding community. <p>All management and monitoring plan have been implemented well by company according to RKL-RPL document. The implementation report has</p>	
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		<p>been reviewed and reported to government agency per semester (six monthly).</p> <p>During document verification and interview with management, it can be demonstrated that all the environmental monitoring plan was implemented as per the RKL-RPL document. The evaluation of environmental monitoring plan effectiveness was carried out and presented in RKL-RPL report semester II 2022 (July – December 2022).</p> <p>Evaluation consists of:</p> <ul style="list-style-type: none"> • 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 wastewater quality and surface water usage. Based on December 2022 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 I and II POM has complied with all relevant regulation. • Public perception monitoring for 2022 has been carried out and there is no negative perception occurred. <p>Certificate of environmental analysis in Semester II 2022, such as:</p>	
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		<ul style="list-style-type: none"> • Clean water, report of analysis D.12.2749-1/LHU/2022 dated 18 January 2023, the result complied to Permenkes No. 492/MENKES/Per/IV/2010 • Surface water, report of analysis No. D.02.376/LHU/2023 dated 22 February 2023, the result complied to PP RI No. 22 tahun 2021 (Lampiran VI) 	
Criteria 3.5: A system for managing human resources is in place.			
3.5.1	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives in accordance with the applicable regulation.</p> <p>- Minor compliance -</p>	<p>In general, there are no changes related to employment procedures includes hiring workers, regulated that hiring and promotion that has been set by PT IIS – Ukui Group, namely:</p> <ul style="list-style-type: none"> • Procedure for worker recruitment (SDM-A-001-00) • Procedure for employee assessment (HRD C-002-00) <p>The procedures were available and mentioned there was no discrimination treatment during recruitment and promotion process. These procedures are accordance with the UU no. 13 / 2003 and UU no. 11 year 2021 <i>UU Cipta Kerja</i>.</p> <p>In the recruitment process, the company has set the standard of competence that inferred in the Position Description and Job Profile. Recruitment selection, hiring and promotion is based on skills, capabilities, qualities, and medical fitness.</p> <p>Job opportunities were communicated and given to surrounding villagers as first priority where no discrimination found observed during interview and related records of workers being employed. All workers have been treated equally in accordance with company regulations including the rights of workers as well. Compliance in accordance with national laws has been evaluated by the organization as described in criterion 2.1. The annual performance evaluation result of workers has shown.</p> <p>During the audit, verification of the implementation of the procedures mentioned above is carried out: on period July 2022 there are promotion</p>	Complied

		<p>from temporary to permanent as many 5 harvester and on period, for example:</p> <ul style="list-style-type: none"> - Promotion from temporary to permanent workers, based on Memorandum No. 001/HR-RO2/MEMO/SK/01/2022, dated 27 January 2022, on behalf of Mr. Hadirat Zega as Harvester in Ukui Estate. - Promotion from temporary to permanent workers, based on Memorandum No. 006/HR-RO2/MEMO/SK/07/2021, dated 20 July 2022, on behalf of Mr. Parasian Purba as Harvester in Ukui Estate. - Promotion from temporary to permanent workers, based on Memorandum No. 060/HR-RO2/MEMO/SK/01/2021, dated 09 January 2022, on behalf of Mr. Boi Nduru as Harvester in Ukui Estate. - Promotion from temporary to permanent workers, based on Memorandum No. 0005/HR-RO2/MEMO/SK/07/2021, dated 02 July 2022, on behalf of Mr. Yamah Laila as Harvester in Ukui Estate. - Promotion from temporary to permanent workers, based on Memorandum No. 04/HR-RO2/MEMO/SK/02/2021, dated 06 February 2022, on behalf of Mr. Sabarudin as Harvester in Ukui Estate. <p>Decrees related to appointment/promotion and recruitment are made in 2 copies: 1 copy for HRD and 1 copy for employees. Based on interviews with employees during the audit, promotional documents or receipts have been provided to all employees.</p>	
<p>3.5.2</p>	<p>Employment procedures are implemented and records are maintained. - Minor compliance -</p>	<p>Procedures related to employment, until this audit is carried out that the document is proven to be well maintained, including:</p> <ol style="list-style-type: none"> 1. SOP recruitment and employee selection No. SOP: AA-HR-305.2-R0 dated 1 February 2009 regarding "<i>penerimaan karyawan baru</i>" (recruitment and selection of employee), explained that: When candidates have passed in the process of selection, next recruitment sends the candidate in full data system averis into HR-it) to be made 	<p>Complied</p>

		<p>an agreement work (made 2 duplicate and should be sign by candidates in question.</p> <p>2. PT Inti Indosawit Subur – Ukui I POM and Estate has issued the specific labour policy and procedures for temporary workers (PHL/PKWT); The policy and procedure are issued for each unit as. For example, Ukui I POM has Memorandum No. 085/EXT-PUS/08/2020, dated 12 August 2020.</p> <p>The policy and procedure have been communicated to workers, especially to temporary workers at Ukui I POM on 18 January 2023, while in Estate socialization conducted on 15 January 2023 to workers of Afdeling I - III, Traksi and administration. The procedure was explaining the detail of mechanism for temporary workers recruitment, promotion of temporary workers to be permanent workers, term and condition and requirement of temporary workers in accordance with National regulation (UU No. 13 tahun 2003).</p> <p>3. Company has established a mechanism to handle complaint from external party, as written in "<i>Mekanisme Penanganan Keluhan</i>" – complaint handling mechanism (Doc. No.SOP AA-GL- 5005-RO 01) while complaint from internal regulated under "<i>Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan</i>" – Employee' complaint and resolution mechanism (Doc. No.SOP-AA-HR-3008-RO 05).</p> <p>4. SOP related to the payments No. AA-FA-219.1-R5: "Pengupahan" (Wages) dated 1 May 2016. Described in this SOP, including:</p> <ul style="list-style-type: none"> • The use of absent card becomes a procedure of using fingerprints. • The addition of leave monitoring analysis in the PMS system <p>The procedures above are well recorded and maintained and this document is accessible to all employees of PT IIS – Ukui Group.</p>	
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Criteria 3.6: An Occupational health and safety (H&S) plan is documented, effectively communicated and implemented.

<p>3.6.1</p>	<p>(C) All operational activities risks assessed to identify the H&S issues. Mitigation plans and procedures are documented and implemented. - Critical (Major) compliance -</p>	<p>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.</p> <p>The procedure has explained that:</p> <ul style="list-style-type: none"> • In point 3, the company commit to implement and maintain occupational health and safety management system in compliance with national and international applicable regulation. • Point 5. Integrating social, environmental, food security, occupational health, and safety issues into operational activities, adopting best technology available, and maintain trained manpower, with skills, and motivated to improve performance through continuous improvement program. <p>The policy has been disseminated to all employees by installing signboard of company policy and by direct dissemination.</p> <p>In 2022 to 2023, PT Inti Indosawit Subur - Ukui Group was communicating the policy Occupational health and safety (H&S) to worker, village communities and contractors, such as:</p> <ul style="list-style-type: none"> • In Ukui I POM – the socialization was on 8 – 9 February 2023 – subject: training for company policy, that was attended by 64 workers. • In Ukui Estate – the socialization was on 2 – 5 February 2023 – subject: training for company policy, that was attended by 201 workers. <p>Record verification:</p> <ul style="list-style-type: none"> • Ukui I POM POM – has defined risk assessment (HIRADC), last review on 4th January 2023, cover processes and activities related to production of CPO, such as: weighbridge, boiler, engine room, loading ramp, sterilizer, threshing, pressing, kernel operation, clarification, office, lab, CPO dispatch, firefighting simulation, POME installation/IPAL, water treatment, chemical warehouse. 	<p>Complied</p>
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		<ul style="list-style-type: none"> • Ukui Estate has prepared HIRADC year 2023, last review on 5 January 2023. Hazard and risk identification and assessment are covering all activity at Ukui 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. The risk analysis and assessment has been performed according to procedure. • The risk assessment has been communicated to all employee, <ul style="list-style-type: none"> - Ukui I POM: Records of dissemination dated 16 January 2023, located at Mill Office, attended by 54 workers. Data verified: Training material, attendance list and photograph. - Ukui Estate: Records of dissemination dated 12 January 2023 located at "Lingkaran Pagi Divisi", that was attended by 65 workers. Data verified: Training material, attendance list and photograph. <p><u>Scheme smallholder</u></p> <p>Each Cooperative (KUD Bina Usaha Baru, KUD Sawit Subur, KUD Karya Bersama, KUD Usaha Baru have 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.</p> <p>Smallholder manager has prepared hazard identification and risk assessment as per "Document Hazard Identification Risk Assessment and Control (HIRAC), last review on 13 January 2023. Risk assessment has calculation of impact value, consequences value, possibility value. All activities, all areas have been evaluated.</p>	
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		<p>Mitigation plans to eliminate or reduce the hazard and risk have been develop according to HIRAC as per "Alternatif Kontrol Resiko untuk Tindakan Perbaikan".</p> <p>Risk Assessment for all operations regarding health and safety was available within the scope of oil palm mill processes activities and agricultural estate activities. As it was considered the stages of OHS risk control hierarchy, that is elimination, substitution, engineering, administrative and PPE (Personnel Protective Equipment).</p>	
<p>3.6.2</p>	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored. - Critical (Major) compliance -</p>	<p>PT Inti Indo Sawit Subur – Ukui Group has prepared OHS plan to address health and safety as per "Program Kerja P2K3" updated on 5th January 2023, consisted of:</p> <ul style="list-style-type: none"> • OHS Meeting (planned: monthly) • Emergency response preparedness (planned in January 2023) • Training for first aider (planned in February 2023) • OHS Inspection, e.g., availability of fire extinguisher and hydrant, PPE and first aid kit (planned: monthly) • MCU both general and special check-up (planned February and March 2023) • Review on Risk Assessment (ISBPR) (planned in January 2023) • Evaluation of law, legal and others applicable requirement (planned in January 2023) • OHS Meeting (planned: monthly) • OHS inspection for contractor (planned: monthly) • OHS Internal Audit (planned: annually) • Report of OHS committee (P2K3) (planned in three monthly basis) • Review on OHS management system (planned (annually) <p>Sample record on implementation the OHS program, such as:</p>	<p>Complied</p>

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		<ul style="list-style-type: none"> Record of OHS meeting dated 6th May 2023, location in Ukui I POM. The meeting was attended by OHS committee. Agenda: discussed regarding OHS plan achievement and corrective actions to achieve target and improve the program, personal protective equipment (PPE), and accident review and report. Report on training of emergency response and preparedness (fire drill), dated 5th March 2023. Location in "Lapangan Ukui Estate". The training was attended by OHS Committee 52 personnel. Data verified: scenario, attendance list, evaluation, and photograph. Record of training for first aider dated 14th January 2023, location in Ukui I POM. Data verified: Training material, attendance list and photograph. Report of MCU was conducted on 7-8 March 2023 Focus Clinical Laboratory – Pekanbaru. Data seen: MCU for 21 workers handling with chemical, such as pesticide, herbicide, and fertilizer applicator and for PIC in pesticides storage. Report of OHS Inspection, e.g., availability of fire extinguisher and hydrant, PPE and first aid kit, dated 6th May 2023. Record of PPE provision for workers as per "Formulir Berita Acara Serah Terima APD", dated 8th April 2023 for 31 workers in Ukui Estate Monitoring of emergency response and preparedness facilities, i.e.: fire hydrant. Based on field visit in Ukui I POM dated 4th February 2023, the performance of hydrant was well. <p>PPE monitoring – "Inspeksi Kedisiplinan Pemakaian APD" dated 12th April 2023 located at Ukui Estate – Division IV; reported OK (all workers using PPE as required at risk assessment)</p>	
<p>Criteria 3.7: All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.</p>			
3.7.1	<p>(C) A documented programme that provides training is in place, which is accessible to all staff, workers, scheme smallholders, and outgrowers taking into account gender- specific needs, and which</p>	<p>PT Inti Indosawit – Ukui Group has a department which is responsible for the training program, which is the Asian Agri Learning Institute.</p>	<p>Complied</p>

	<p>covers applicable aspects of P&C Principles, in a form they understand and includes assessment of the training.</p> <p>- Critical (Major) compliance -</p>	<p>Through its employee data (master of employees) and training data personal records, the Asian Agri Learning Institute Department will recommend the Estate and Mill to participate in a training program annually and will also evaluate the effectiveness of the training that has been followed.</p> <p>The training program is divided into several aspects: technical, Administration, Environments & Sustainability and special certifications and there are also training involving vendors or operational suppliers.</p> <p>Training program has shown as per "Daftar Rencana Pelatihan 2023", updated on 10 January 2023 consisted of:</p> <ul style="list-style-type: none"> • (Refreshment) Training of SCCS, planned in March 2023 • (Refreshment) Training of OHS and PPE, planned in April 2023 • (Refreshment) Training of mill cleaning during processing, EFB transport, Pest control and spraying tools maintenance, planned in May 2023 • (Refreshment) Training of waste sample delivery, mill processing, fertilizing, agrochemical handling, planned in June 2023 • (Refreshment) Training of handling of POME, solid and hazardous waste, first aid, mill and transport maintenance planned in July 2023 • (Refreshment) Training for Boiler operator and general maintenance, planned in August 2023 • (Refreshment) Training of extra decanter, power generator and electricity, planned October 203 • (Refreshment) Training for guest reception and first aid, planned in November 2023 • (Refreshment) Training for hazardous waste handling, fuel uses for transport, planned in December 2023 <p>All the record of training is in place.</p>	
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<p>3.7.2</p>	<p>Records of training are maintained, where appropriate on an individual basis. - Minor compliance -</p>	<p>During ASA 2_2, there was verified sample records of training implementation, consist of attendance list, training material and post training evaluation, such as:</p> <ul style="list-style-type: none"> • Refreshment training of OHS and PPE, dated 4th April 2023, attended by 23 participants – in Ukui I POM. • Refreshment training for Oryctes spraying operator, dated 14th February 2023, attended by 6 participants – in Ukui Estate. • Refreshment training of agrochemical and hazardous material handling, dated 23rd March 2023, attended by 19 participants – in Ukui Estate. • Refreshment training of guest reception, dated 18th January 2023, attended by 8 participants – Ukui I POM. • Refreshment training of boiler operator, dated 24th November 2022, attended by 5 participants – Ukui I POM. • Refreshment training of agrochemical handling, dated 5th December 2022, attended by 6 participants – in Ukui Estate. • Refreshment training of spraying tools maintenance, dated 19th March 2023, attended by 15 participants – in Ukui Estate. • Refreshment training of mill cleaning, dated 15th March 2023, attended by 13 participants – in Ukui I POM. <p>PT Inti Indosawit Subur – Ukui Group 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 2022-2023, the list of participants attending the trainees, and some photographs of the activities at the time of training.</p>	<p>Complied</p>
<p>3.7.3</p>	<p>Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification</p>	<p>PT IIS – Ukui I POM has provided training for personnel carrying out the tasks critical to the effective implementation of the Supply Chain</p>	<p>Complied</p>

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	<p>Standard (SCCS). Training is specific and relevant to the task(s) performed.</p> <p>- Minor compliance -</p>	<p>Certification Standard (SCCS) including Mill manager, weighbridge clerk, production clerk, administration head.</p> <p>Latest SCCS training has been carried out on 15 November 2022 by Sustainability Dept.</p> <p>Evidence of training can be demonstrated during audit such as attendance list, training material and photo documentation.</p> <p>During interview with weighbridge Clerk and Mill Manager, confirmed that they have understanding on RSPO supply chain.</p>	
<p>Criteria 3.8: Supply chain requirements for mills. Procedure note: all requirements are classified as Critical Indicators. However it will not contribute to suspension if there is more than 5 non-compliance within a principle)</p>			
<p>3.8.1</p>	<p>Identity Preserved Module</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.</p> <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.</p>	<p>PT Inti Indosawit Subur – Ukui I POM implements RSPO Supply Chain model Mass Balance.</p> <p>Not applicable.</p>	<p>Not Applicable</p>
<p>3.8.2</p>	<p>Mass Balance Module</p> <p>A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	<p>PT. Inti Indosawit Subur – Ukui I POM uses Mass Balance supply chain model. The mill only claimed the FFB proportion from certified supply bases which comprise of company-own estate (Ukui Estate) and 9 scheme Smallholder in form of cooperative/Koperasi Unit Desa (KUD). The proportion of non-certified FFB comes from third-party supplier, consist of 17 Supplier:</p> <ul style="list-style-type: none"> - Asosiasi Amanah - Asosiasi Anugrah 	<p>Complied</p>

		<ul style="list-style-type: none"> - Besty Ella Sima Siahaan - RKP - BTR - Haluga - CV Harapan Kita - James Sihombing - Koperasi Air Hitam Jaya - Ady - Vicky - Bumdes Amanah - Sepakat Saudara Kita - Saliman - Bunga Tanjung - Budi - Peter Susetio Hadi 	
<p>3.8.3</p>	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p>	<p>The estimated tonnage of certified CPO and PK that could potentially be produced by PT. Inti Indosawit Subur – Ukui I POM is recorded in RSPO Public Summary report, certificate and RSPO IT Platform.</p> <p>The mill has met registration and reporting requirement as it registered in RSPO IT Platform (PalmTrace) with ID number RSPO_PO1000000148.</p> <p>Below is the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year 2022/2023:</p> <p><u>Forecast volume (August 2022 – July 2023)</u></p> <p>FFB: 177,451 MT CPO: 32,284 MT (OER: 20.45%) PK: 9,227 (KER: 5.20%)</p> <p><u>Actual production volume (August 2022 – April 2023)</u></p>	<p>Complied</p>

		<p>FFB: 112,292.27 MT CPO: 22,905.25 MT PK: 5,128.49 MT <u>Actual sold volume as RSPO certified (August 2022 – April 2022)</u> CPO: - PK: 4,782.91 MT</p>	
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	<p>Ukui I POM is a 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 I POM has meet all registration and reporting requirements. RSPO IT Platform/PalmTrace account RSPO_PO1000000148.</p>	Complied
3.8.5	<p>Documented procedures The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ol style="list-style-type: none"> Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill’s procedures for the implementation of this standard. 	<p>During audit ASA 2.2 there is no changing in the documented procedure related to RSPO Supply chain. PT. Inti Indosawit Subur – Ukui I POM can demonstrate procedures as follow:</p> <ul style="list-style-type: none"> Standard Operating Procedures – Traceability (AA-MPM-OP-1400.17.R7) dated 1 October 2019. The procedures cover traceability of CPO and PK, since FFB receiving from Ukui Estate and Smallholder, processing up to shipping of CPO and PK as well as daily production report. The procedure also regulates the internal audit by Sustainability Internal Audit Manager. Traceability records are to be kept for 10 years. Standard Operating Procedure – Book Keeping (AA-MPM-OP-1400.18-R4). The procedure explains method to check only certified product received. The book keeping mass balance stated every 3 months: January-March, April-June, July-September, and October-December each year. Head of Environment and Sustainability will inform to Certification Body in the case of projected overproduction. 	Complied

	<p>d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill.</p>	<ul style="list-style-type: none"> • SOP for mill operation Mill Policy Manual: <ul style="list-style-type: none"> - SOP AA-MPM-OP-1400.02.R2 Stasiun Penerimaan for FFB receiving station; - SOP AA-SOP-OP-101.5-R0 Grading; - SOP AA-MPM-OP-1400.03.R1 Stasiun Rebusan for sterilizer; - SOP AA-MPM-OP-1400.04.R1 Stasiun Pemisahan Berondolan for loose fruit separation; - SOP AA-MPM-OP-1400.05-R1 Stasiun Pengadukan dan Pengempaan for pressing station; - SOP AA-MPM-OP-1400.06-R1 Stasiun Pemurnian for clarification; - SOP AA-MPM-OP-1400.07-R1 Stasiun Pemisahan Nut dan Fiber for nut and fiber separation; - SOP AA-MPM-OP-1400.08-R1 Stasiun Kernel for kernel station; - SOP AA-MPM-OP-1400.09-R1 Stasiun Boiler; - SOP AA-MPM-OP-1400.10-R1 Stasiun Engine Room; - SOP AA-MPM-OP-1400.11-R1 Stasiun Water Treatment; - SOP AA-MPM-OP-1400.12-R1 Laboratorium; - SOP AA-MPM-OP-1400.13-R1 Stasiun Pengelolaan Limbah for palm oil mill effluent treatment; - SOP AA-MPM-OP-1400.14-R2 Stasiun Penimbunan dan Pengiriman CPO dan Kernel for CPO and PK bulking and despatch operation; - SOP AA-MPM-OP-1400.15-R1 Perawatan for preventive maintenance; - SOP AA-MPM-OP-1400.18-R4 Book Keeping - SOP AA-MPM-OP-1400.17-R7 Traceability <p>PT. Inti Indosawit Subur – Ukui I POM is able to demonstrate complete and up-to-date records and report demonstrating compliance with the</p>	
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		<p>supply chain's general requirement and modular requirement, including training records.</p> <p>As per Procedure of Traceability (AA-MPM-OP-1400.17-R7), the responsible person in charge to the supply chain system is Mill Manager. During audit, the mill manager is able to demonstrate sufficient knowledge and understanding on RSPO supply chain implementation for palm oil mill.</p> <p>PT IIS Ukui I POM has a procedure 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.</p>	
<p>3.8.6</p>	<p>Internal Audit</p> <p>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill;</p> <p>a) Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>b) Effectively implements and maintains the standard requirements within its organisation.</p> <p>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p>	<p>PT. Inti Indosawit Subur – Ukui I POM has a procedure to conduct internal audit RSPO, including RSPO SCCS as per Procedure SOP Internal Audit Nomor: AA-SOP-ES-6001-R5 dated 1 August 2020; Chapter 4.0 stated that Internal audit conducted minimum once a year considering the critical area.</p> <p>Last internal audit conducted on 6 - 11 March 2023. The report available under document "Internal Audit Sustainability Integrasi". The internal audit was conducted for RSPO P&C including supply chain. During internal audit, it was raised 1 nonconformity related to OHS implementation; corrective action and follow up action has been taken to address the non-conformity.</p> <p>Management review has been conducted on dated 19 March 2023, was attended by Technical Controller, POM Manager, Mill assistant and Sustainability Staff. Document of Management Review available and recorded in minutes of meeting:</p> <ul style="list-style-type: none"> - Internal audit result - Customer feedback - Proses performance and product conformity - Status of Corrective and Preventive Action 	<p>Complied</p>

		<ul style="list-style-type: none"> - Follow up previous management review - Change that could effect to the management system - Output of management review has include: - Recommendation for improvement - Resources needed. 	
<p>3.8.7</p>	<p>Purchasing and Goods In</p> <ul style="list-style-type: none"> i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBS received. ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage. iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents. 	<p>PT Inti Indosawit Subur – Ukui I POM has demonstrated SOP of Traceability (AA-MPM-OP-1400.7.R7), chapter 5.1 indicates the Weighbridge Clerk has responsibility to input data and print weighbridge card based on “Surat Pengantar TBS”, covering information e.g. estate name and block number, mill name, date of delivery, product description and quantity, RSPO certificate number, transporter identity and unique identification number.</p> <p>PT. Inti Indosawit Subur – Ukui I POM receive FFB from certified and non-certified source. Certified source consist of own estate (Ukui Estate) and 9 scheme Smallholder in form of cooperative/Koperasi Unit Desa (KUD). The proportion of Non-certified FFB comes from third-party supplier (17 Supplier: Asosiasi Amanah, Asosiasi Anugrah, Besty Ella Sima Siahaan, RKP, BTR, Haluga, CV Harapan Kita, James Sihombing, Koperasi Air Hitam Jaya, Ady, Vicky, Bumdes Amanah, Sepakat Saudara Kita, Saliman, Bunga Tanjung, Budi, Peter Susetio Hadi).</p> <p>Document “Surat Pengantar TBS” (FFB Delivery Note) and Kartu Timbangan (Weighbridge Card) described identity and location of FFB source and other item required e.g.</p> <p>Certified FFB:</p> <p><u>Ukui Estate</u></p> <ul style="list-style-type: none"> • FFB delivery notes “Surat Pengantar TBS No.001” from Afdeling 4, block C89a, C89b dated 13 May 2023 – total bunches: 250 bunches. Weighbridge ticket “Kartu Timbangan No.PUSA123104937” dated 13 May 2023, for 250 FFB bunches; nett weight 6,770 kg; from Ukui Estate, Afdeling 4, block C89a, C89b; vehicle number BM8572TE; 	<p>Complied</p>

		<p>Driver: Riadi; RSPO certificate No.RSPO633774.</p> <ul style="list-style-type: none"> • FFB delivery notes "Surat Pengantar TBS No.00126" from Afdeling 2, block B15i, B16a dated 13 May 2023 – total bunches: 249 bunches. Weighbridge ticket "Kartu Timbangan No.PUSA123101936" dated 13 May 2023, for 249 FFB bunches; nett weight 5,110 kg; from Ukui Estate, Afdeling 2, block B15i, B16a; vehicle number BM8277TZ; Driver: Zulham; RSPO certificate No.RSPO633774. • FFB delivery notes "Surat Pengantar TBS No.001" from Afdeling I, block A17a and A17c dated 13 May 2023 – total bunches: 562 bunches. Weighbridge ticket "Kartu Timbangan No.PUSA123104355" dated 13 May 2023, for 562 FFB bunches; nett weight 6,430 kg; from Ukui Estate, Afdeling 1, block A17a & A17c; vehicle number BM8280TZ; Driver: Agus Junaidi; RSPO certificate No.RSPO633774. <p><u>Ukui Plasma</u></p> <ul style="list-style-type: none"> • FFB delivery note: "Bon Pengantar TBS No. P-043" dated 12/05/2023 from KUD Bina Usaha Baru, KT 33 Mandiri Bersama, FFB amount 337 bunches, Vehicle Number BM8030CE, Driver: Eko; Weighbridge Ticket "Kartu Timbangan" No. PUSA223103231 dated 12/05/2023, From KT-33 Mandiri Bersama, ID KPU, FFB amount 337 bunches, net weight 9,613 kg, vehicle number BM8030CE, driver: Eko, RSPO Certificate No: RSPO633774. • FFB delivery note: "Bon Pengantar TBS No. P-002" dated 11/05/2023 from KUD Sawit Subur, KT 55 Subur Makmur, FFB amount 302 bunches, Vehicle Number BM8596DC, Driver: Kandar; Weighbridge Ticket "Kartu Timbangan" No. PUSA223103207 dated 12/05/2023, From KT-55 Subur Makmur, ID KPU, FFB amount 302 bunches, nett weight 9,535 kg, vehicle number BM8596DC, driver: Kandar, RSPO Certificate No: RSPO633774. • FFB delivery note: "Bon Pengantar TBS No. P-006" dated 12/05/2023 from KUD Sumber Bahagia, KT 115 Saputra, FFB amount 250 bunches, Vehicle Number BM8584IQ, Driver: Posmah; Weighbridge Ticket 	
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		<p>"Kartu Timbangan" No. PUSA223103213 dated 12/05/2023, From KT-115 Saputra, ID KPU, FFB amount 250 bunches, nett weight 5,694 kg, vehicle number BM8584IQ, driver: Posmah, RSPO Certificate No: RSPO633774.</p> <ul style="list-style-type: none"> FFB delivery note: "Bon Pengantar TBS No. P-052" dated 03/05/2023 from KUD Karya Bersama, KT 03 Tani Mulya, FFB amount 220 bunches, Vehicle Number BM8525LC, Driver: Jamal; Weighbridge Ticket "Kartu Timbangan" No. PUSA223102962 dated 03/05/2023, From KT- 03 Tani Mulya, ID KPU, FFB amount 220 bunches, nett weight 7,003 kg, vehicle number BM8525LC, driver: Jamal, RSPO Certificate No: RSPO633774. <p>Non-certified FFB:</p> <ul style="list-style-type: none"> FFB delivery note: "Surat Pengantar TBS", No. P.026 dated 12 May 2023 From Anugrah (APSSA), vehicle number BM8247BO; driver: Eko R; Weighbridge ticket "Tiket Timbangan No.PUSA523104492" dated 12/05/2023, for 581 FFB bunches; nett weight 9,869 kg; FFB source from non-certified third party FFB supplier: Anugrah (APSSA), ID A075; vehicle BM8247BO, Driver: Eko R. FFB delivery note: "Surat Pengantar TBS", No. BM8525LB dated 12 May 2023 From Amanah (APSSA), vehicle number BM8525LB; driver: Jamal; Weighbridge ticket "Tiket Timbangan No.PUSA523104498" dated 12/05/2023, for 504 FFB bunches; nett weight 8,566 kg; FFB source from non-certified third party FFB supplier: Amanah (APSSA), ID A074; vehicle BM8525LB, Driver: Jamal. <p>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.</p> <p>Ukui I POM monitors the status of supplied raw material from certified and non-certified sources through Book Keeping Mass Balance system in three-monthly balance. In case on non-conforming raw material entering</p>	
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		<p>the process, Ukui I POM has the mechanism to handle non-conforming material and/or document. Ukui I POM demonstrated the simulation on recall of non-conforming material.</p> <p>Up to this audit ASA 2.2, there has been no case of non-conforming material and/or documents entering the process.</p>	
<p>3.8.8</p>	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ul style="list-style-type: none"> a) The name and address of the buyer; b) The name and address of the seller; c) The loading or shipment / delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation; i) A unique identification number. 	<p>Since latest audit until audit ASA 2.2 May 2023 there is no CPO sold as RSPO certified. All certified CPO sold as ISCC certified. All PK certified RSPO was sold to Ukui I KCP which is one location with Ukui I Palm Oil Mill, PK deliver through conveyor. PK delivery was record in Delivery Form. Sample seen of delivery form CSPK from Ukui I POM to Ukui I KCP:</p> <ul style="list-style-type: none"> • Delivery Form No. KCP PUS 1001 SS dated 31 Jan 2023, From PT IIS – Ukui I POM to PT IIS – KCP Ukui I, Commodity: RSPO Certified Palm Kernel, Supply Chain model: Mass Balance, certificate number: RSPO633774, quantity 709,360 kg, transport by Fan/Pipe. • Delivery Form No. KCP PUS 1001 SS dated 28 Feb 2023, From PT IIS – Ukui I POM to PT IIS – KCP Ukui I, Commodity: RSPO Certified Palm Kernel, Supply Chain model: Mass Balance, certificate number: RSPO633774, quantity 490,906 kg, transport by Fan/Pipe. • Delivery Form No. KCP PUS 1001 SS dated 31 Mar 2023, From PT IIS – Ukui I POM to PT IIS – KCP Ukui I, Commodity: RSPO Certified Palm Kernel, Supply Chain model: Mass Balance, certificate number: RSPO633774, quantity 514,306 kg, transport by Fan/Pipe. • Delivery Form No. KCP PUS 1001 SS dated 30 Apr 2023, From PT IIS – Ukui I POM to PT IIS – KCP Ukui I, Commodity: RSPO Certified Palm Kernel, Supply Chain model: Mass Balance, certificate number: RSPO633774, quantity 581,417 kg, transport by Fan/Pipe. <p>Those transaction was recorded in PalmTrace as TR-a11812e1-e22a, dated 31 March 2023 for CSPK Mass Balance, volume 1752.19 MT (based on PK Process). Seller PT. Inti Indosawit Subur – Ukui I POM. Buyer PT. Inti Indosawit Subur – Ukui I KCP.</p>	<p>Complied</p>

<p>3.8.9</p>	<p>Outsourcing Activities</p> <p>i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification.</p> <p>ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</p>	<p>PT. Inti Indosawit Subur – Ukui I POM does not outsource its milling activities, however operate subcontractor for CPO and PK transporter. The appointed outsourced company is PT Sumber Kencana, CV Jasa Sahabat Abadi, CV Jasa Bersama, CV Jaya Pertama, PT Buana Jaya Bersama. During this audit ASA 2.2 there is no new additional transporter of CPO and PK.</p> <p>PT. Inti Indosawit Subur – Ukui I POM having legal ownership of material being transported by appointed outsourced companies.</p> <p>PT. Inti Indosawit Subur – Ukui I POM have a contract agreement with transporter as below:</p> <ul style="list-style-type: none"> - “Perjanjian Pengangkutan Nomor: 06/VI/SKI-IIS/2020” dated 4 June 2020 between PT Inti Indosawit Subur – Ukui I POM 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 – Ukui I POM and CV Jasa Sahabat Abadi. Contract transport for CPO & PK. - “Perjanjian Pengangkutan Nomor: 07/VI/JP-IIS/2020” dated 4 June 2020 between PT Inti Indosawit Subur – Ukui I POM and CV Jasa Bersama. Contract transport for CPO & PK. - “Perjanjian Pengangkutan Nomor: 02/VI/JP-IIS/2020” dated 4 June 2020 between PT Inti Indosawit Subur – Ukui I POM 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 – Ukui I POM and PT Buana Jaya Bersama. Contract transport for CPO & PK. <p>Contract agreements are signed and enforceable by both parties. According to contract agreement article 7 point 1.m stated that “Transporter bersedia memenuhi persyaratan sistem sertifikasi rantai pasok saat pengangkutan bahan baku dan bersedia untuk diaudit oleh auditor internal perusahaan dan auditor pihak eksternal dari badan</p>	<p>Complied</p>
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		<p>sertifikasi yang ditunjuk oleh pihak kedua jika diperlukan” – Transporter are willing to comply with certification system of RSPO Supply Chain during transport material and willing to be audit by internal auditor company (PT IIS – Ukui I POM) and external auditor from Certification Body if necessary.</p> <p>PT IIS Ukui I POM has a procedure to control the outsourced transporter through “SOP Traceability AA-MPM-OP-1400.17-R7 dated 1 October 2019”</p> <p>Internal control for CPO and PK delivery by transporter has made as well with administration control before and during transport the CPO and PK. Document for transport CPO and PK was sighted during audit:</p> <ul style="list-style-type: none"> ✓ Surat Izin Muat CPO dan Kernel, contain information of Driver name, Identity number, Car/Truck Number, CPO/PK Dispatch time, netto, incoming and outgoing time. ✓ Delivery Order Slip from Transporter, contain information of sales contract number, Truck number, destination, driver name, port destination. ✓ Daftar Periksa Kesiapan Pengiriman CPO/Kernel contain information of Truck number, driver name, date of inspection, item inspection including: driver identity and completeness of vehicle legality, completeness of physical standard of vehicle, number of seal. <p>During audit can be demonstrated that internal control has been implemented accordingly.</p>									
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	<p>PT Inti Indosawit Subur – Ukui I POM has recorded name and contact detail of all contractors, as follows:</p> <table border="1" data-bbox="1093 1166 1951 1316"> <thead> <tr> <th>Name of Transporter</th> <th>Address</th> <th>Contact Person</th> <th>Phone Number</th> </tr> </thead> <tbody> <tr> <td>CV Sumber Kencana</td> <td>Jl Veteran No 77, Rengat, Riau</td> <td>Atun/Hendra</td> <td>08127580***/085278043***</td> </tr> </tbody> </table>	Name of Transporter	Address	Contact Person	Phone Number	CV Sumber Kencana	Jl Veteran No 77, Rengat, Riau	Atun/Hendra	08127580***/085278043***	Complied
Name of Transporter	Address	Contact Person	Phone Number								
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		<table border="1"> <tr> <td>CV Jasa Sahabat Abadi</td> <td>Jl Besar Kisaran, Medan</td> <td>Darmin Tanudjaja</td> <td>085372344***</td> </tr> <tr> <td>CV Jasa Bersama</td> <td>Jl Siak No 2, Pekanbaru</td> <td>Suwito Djingga/Lesi</td> <td>08126062***/08127512***</td> </tr> <tr> <td>CV Jaya Pertama</td> <td>Jl Timor No 10, Medan 20235</td> <td>Bu Lie Kiem</td> <td>085266301***</td> </tr> <tr> <td>PT Buana Jaya Bersama</td> <td>Pekanbaru, Riau</td> <td>Eltono</td> <td>082169511***/082170430***</td> </tr> </table>	CV Jasa Sahabat Abadi	Jl Besar Kisaran, Medan	Darmin Tanudjaja	085372344***	CV Jasa Bersama	Jl Siak No 2, Pekanbaru	Suwito Djingga/Lesi	08126062***/08127512***	CV Jaya Pertama	Jl Timor No 10, Medan 20235	Bu Lie Kiem	085266301***	PT Buana Jaya Bersama	Pekanbaru, Riau	Eltono	082169511***/082170430***	
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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.	<p>The site committed to inform CB related name and contact details of any new contractors as mentioned in Procedure "SOP Traceability AA-MPM-OP-1400.17-R7 dated 1 October 2019".</p> <p>There is no new contractor or transporter since the latest audit until audit ASA 2.2.</p>	Complied																
3.8.12	<p>Record keeping</p> <p>i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.</p> <p>ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.</p> <p>iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p>iv) For Mass Balance Module, the mill:</p> <p>a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</p>	<p>The organization has maintained accurate, complete, up-to-date and accessible records and reports covering all aspects of RSPO Supply Chain requirements, as evident in:</p> <ul style="list-style-type: none"> - FFB delivery note - Weighbridge ticket for FFB receiving, CPO and PK delivery - Delivery Order - Sales contract - Shipping Announcement - Mass balance report - Internal audit RSPO SCCS and Management review <p>The procedure of Traceability (AA-MPM-OP-1400.7.R7), requires that all records and reports related to traceability and book keeping are retained for a period of 10 years.</p> <p>All receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK are record and balance in a three-monthly basis, as evidence in "Mass</p>	Complied																

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	<p>b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock).</p>	<p>Balance Report Ukui I POM" period 2022/2023: January – March, April – June, July – September, October – December, January – March.</p> <p>All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios/actual production of CPO and PK.</p> <p>According to Mass balance Report 2022/2023, Ukui I POM only deliver Mass Balance sales from a positive stock.</p>							
<p>3.8.13</p>	<p>Extraction Rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate(KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	<p>The organization is able to provide estimate volume of CPO and PK in a year period as in Budget FY2022/2023 Production FFB, CPO and PK. The organization also keep an up-to-date record of the FFB volume received, CPO and PK produced over a period of twelve (12) month, as in Rekapitulasi Produksi TBS, CPO dan PK PT Inti Indosawit Subur – Ukui I POM.</p> <p>OER and KER are estimated based on associated inputs and upon past experience (previous year FFB, CPO and PK production).</p> <p>The site has set OER for budget 2023 (Jan - Dec) as 19.22% and KER as 5.30%.</p> <p>Budget FFB process 2023: certified 166,338.27 MT, non-certified: 150,196.48 MT</p> <p>Budget CPO production 2023: certified 33,032.17 MT, non-certified 27,792.24 MT.</p> <p>Budget PK production 2023: certified 8,815.93 MT, non-certified 7.960.41 MT.</p> <p>Realization of CPO and PK production since latest 12 month (May 2022 – April 2023) as below:</p> <table border="1" data-bbox="1093 1217 1653 1362"> <thead> <tr> <th>Description</th> <th>Realization</th> </tr> </thead> <tbody> <tr> <td>FFB Certified</td> <td>172,477.54 MT</td> </tr> <tr> <td>FFB Non-Certified</td> <td>124,202.17 MT</td> </tr> </tbody> </table>	Description	Realization	FFB Certified	172,477.54 MT	FFB Non-Certified	124,202.17 MT	<p>Complied</p>
Description	Realization								
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3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	<p>The actual conversion ratio is monitored on daily basis through sounding result and documented in daily report. PT. Inti Indosawit Subur – Ukui I POM is able to demonstrate the work instruction for analysis of oil content. Sample seen on document of "Laporan Harian Produksi". Based on Laporan Harian Produksi dated 20 May 2022, the sounding result and production report shows that actual conversion ratios from FFB into CPO are:</p> <ul style="list-style-type: none"> a. OER For FFB from Ukui Estate: 21.52% b. OER For FFB from Ukui I Plasma: 19.97% c. OER For FFB from third-party: 19.08% d. OER Average 20.05% <p>And actual conversion ratios from FFB into PK are:</p> <ul style="list-style-type: none"> a. KER For FFB from Ukui Estate: 5.03% b. KER For FFB from Ukui I Plasma: 5.03% c. KER For FFB from third-party: 5.03% d. OER average 5.03% 	Complied												
3.8.15	Processing For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil	Not applicable. PT IIS – Ukui I POM implementing Mass Balance Model for Supply Chain.	Complied												

	<p>palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>																																						
<p>3.8.16</p>	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p>	<p>PT. Inti Indosawit subur – Ukui I POM has made shipping announcement inside PalmTrace transaction, sample seen for period April 2022 – March 2023:</p> <table border="1" data-bbox="1093 568 1944 1008"> <thead> <tr> <th>Transaction ID</th> <th>Buyer</th> <th>Product</th> <th>Supply Chain Model</th> <th>Volume</th> <th>Status</th> </tr> </thead> <tbody> <tr> <td>TR-a11812e1-e22a</td> <td>PT IIS - Ukui I KCP</td> <td>CSPK</td> <td>MB</td> <td>1,752.19</td> <td>Confirmed</td> </tr> <tr> <td>TR-1e8a3db7-0ca*</td> <td>PT IIS - Ukui I KCP</td> <td>CSPK</td> <td>MB</td> <td>2,187.43</td> <td>Confirmed</td> </tr> <tr> <td>TR-445d19a9-8d4*</td> <td>PT IIS - Ukui I KCP</td> <td>CSPK</td> <td>MB</td> <td>600.36</td> <td>Confirmed</td> </tr> <tr> <td>TR-fff9c8b7-b126</td> <td>PT IIS - Ukui I KCP</td> <td>CSPK</td> <td>MB</td> <td>2,086.39</td> <td>Confirmed</td> </tr> <tr> <td>TR-32D2B0F56-194D</td> <td>PT IIS - Ukui I KCP</td> <td>CSPK</td> <td>MB</td> <td>1,966.81</td> <td>Confirmed</td> </tr> </tbody> </table> <p>PT. Inti Indosawit Subur – Ukui I POM made remove RSPO certified CSPO from their PalmTrace account with volume remove: 36,182.43 MT CSPO; Stock removed for CSPO sold as ISCC certified. The evidence of remove transaction can be demonstrated on the palmtrace transaction with transaction ID: ST-TR-7326DD83-afc9, remove date: 11/05/2023.</p>	Transaction ID	Buyer	Product	Supply Chain Model	Volume	Status	TR-a11812e1-e22a	PT IIS - Ukui I KCP	CSPK	MB	1,752.19	Confirmed	TR-1e8a3db7-0ca*	PT IIS - Ukui I KCP	CSPK	MB	2,187.43	Confirmed	TR-445d19a9-8d4*	PT IIS - Ukui I KCP	CSPK	MB	600.36	Confirmed	TR-fff9c8b7-b126	PT IIS - Ukui I KCP	CSPK	MB	2,086.39	Confirmed	TR-32D2B0F56-194D	PT IIS - Ukui I KCP	CSPK	MB	1,966.81	Confirmed	<p>Complied</p>
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<p>3.8.17</p>	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	<p>PT. Inti Indosawit Subur – Ukui I POM has not made claims regarding the support of RSPO certified oil palm products. However, the organization aware about the RSPO Rules on Market Communications and Claims.</p>	<p>Complied</p>																																				

General corporate communications			
4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	PT. Inti Indosawit Subur (with the brand Asian Agri), the parent company of Ukui I POM is highlighting its commitment to the principles of RSPO, and directly referring to RSPO website. The corporate communication can be found at http://www.asianagri.com .	Complied
4.2	<p>In corporate communications a member is allowed to:</p> <ul style="list-style-type: none"> • Display its RSPO membership status • Display the RSPO web address (www.rspo.org) • State that the member supports the work of the RSPO • State the member's history with regard to the RSPO. • Use the RSPO trademark to promote its membership of the RSPO. <p>Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at www.rspo.org' where the link must lead to the member's profile page.</p>	<p>PT. Inti Indosawit Subur (with the brand Asian Agri), in its website:</p> <ol style="list-style-type: none"> a. Display its RSPO membership status: No, PT. Inti Indosawit Subur (with the brand Asian Agri), did not display its RSPO membership status. The CH only stated "In 2006, became a member of the Roundtable of Sustainable Palm Oil. We received our first RSPO certification for our estate in 2010." b. Display the RSPO web address: Not in direct manner. PT. Inti Indosawit Subur (with the brand Asian Agri), made a link to RSPO website. c. State the member supports the work of the RSPO: Not in direct manner. In the website, PT. Inti Indosawit Subur (with the brand Asian Agri), "In 2006, became a member of the Roundtable of Sustainable Palm Oil. We received our first RSPO certification for our estate in 2010." d. State the member's history with regards to the RSPO: Not in direct manner. On the website, PT. Inti Indosawit Subur (with the brand Asian Agri), "In 2006, became a member of the Roundtable of Sustainable Palm Oil. We received our first RSPO certification for our estate in 2010, and in 2012, the certification for our smallholder scheme." e. 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. 	Complied

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4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	PT. Inti Indosawit Subur (with the brand Asian Agri), did not display its RSPO membership status. It is clear that the statement did not lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Complied
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member’s own products.	PT. Inti Indosawit Subur (with the brand Asian Agri), did not display its RSPO membership status. It is clear that the statement are clear and did not mislead consumers or other stakeholders as to the certified content of oil palm products in the PT. Inti Indosawit Subur – Ukui I POM own products.	Complied
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	PT. Inti Indosawit Subur (with the brand Asian Agri) did not display RSPO Corporate Logo in any document.	Complied
Business to business communications			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	There was no use of RSPO trademark and/or RSPO corporate logo in business-to-business communication related to RSPO certified product; between PT. Inti Indosawit Subur – Ukui I 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 I 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	PT. Inti Indosawit Subur – Ukui I POM is not a distributor and/or wholesaler. Not applicable.	Not Applicable

	<p>certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.</p> <p>b) If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p>		
5.4	<p>A certified member can provide information to its customers detailing the presence of certified palm oil contained within a product even if it is not eligible for a product-specific under RSPO rules. The end product must not be labelled as certified or sold in such a way that implies RSPO certification.</p> <p>For example, a retailer or food service company may require a breakdown of all palm based ingredients within an end product and the certified status of each. This information may be provided by a certified RSPO member without constituting a product-specific claim.</p>	<p>PT. Inti Indosawit Subur – Ukui I POM is not producing or selling end-product to consumer. No labelling on product whatsoever.</p> <p>Not applicable.</p>	Complied
MODULE B – MASS BALANCE SPECIFIC RULES			
Minimum Mass Balance content			
	95% or above of the oil palm content must be RSPO MB-certified.	PT Inti Indosawit Subur – Ukui I POM produces and sells CSPO and CSPK; All CSPO/CSPK sold are 100 % content oil palm RSPO MB-certified.	Complied
	Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.	<p>There is percentage of non-certified oil palm within the product CSPO/CSPK.</p> <p>PT Inti Indosawit Subur – Ukui I POM was not produce end consumer goods. The production are CPO and PK.</p>	Complied
Labelling and trademark (MB)			
	Members are allowed to use the RSPO label in one of the following ways:	PT Inti Indosawit Subur (with the brand Asian Agri), did not use RSPO trademark in its corporate communication such in website.	Complied

	<ul style="list-style-type: none"> • Surrounded by the text: 'Certified sustainable palm oil'. • The RSPO label MUST contain the tag 'MIXED'. The tag MIXED designates oil palm products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag 'MIXED' on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim. • The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'. • Wherever the RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4 pt (1.4 mm or 0.06 inch). • In on-pack communications, the RSPO trademark can be printed anywhere on the pack. Further guidance on use of the trademark is provided in the RSPO Trademark License Terms and Conditions and in Annex 1 of the Rules on Market Communications & Claims document. 	<p>When confirming the sales of certified oil palm products, PT Inti Indosawit Subur – Ukui I POM followed the requirements of the RSPO SCCS. PT Inti Indosawit Subur – Ukui I POM stating the supply chain model and certificate number under which the claim is being made.</p>	
Messaging (MB)			
	<p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <ul style="list-style-type: none"> • [Oil palm products]/[palm oil]/[palm kernel oil] from RSPO-certified mills and plantations were mixed with non-certified oil palm products in the supply chain. • The volume of [oil palm products][palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations. 	<p>PT Inti Indosawit Subur was not use storytelling in product-related communications.</p>	<p>Complied</p>

	<p>In off-product communications, reference to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown in company records is allowed.</p> <p>Messaging NOT ALLOWED in storytelling in product-related communications:</p> <ul style="list-style-type: none"> • Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product. 		
<p>Principle 4: Respect community and human rights and deliver benefit Respect community rights, provide equal opportunities, maximise benefits from engagement and ensure remediation where needed.</p>			
<p>Criteria 4.1: The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.</p>			
<p>4.1.1</p>	<p>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, supply chain and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>Since 2014, the company has established policies related to respect for human rights defenders and until now there has been no change. That on the Point 13 of the policy states that "<i>The Company respects human rights by treating all employees fairly, in recruitment, performance assessment, conditions and work environment and representation irrespective of tribe, caste, nationality, religion, disability, gender, sexual orientation, union membership, political affiliation and/or age</i>".</p> <p>Separately, PT IIS – Ukui Group has 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: "<i>Prohibited for retaliation, intimidation and harassment for whistleblowers/human rights defenders...</i>"</p> <p>This policy has been disseminations to all worker, stakeholder and second party (contractor) as well as follow:</p> <ul style="list-style-type: none"> - On 18 – 20 October 2022 (attended by 33 participants of workers of Ukui Estate and contractors as well), - On 8 - 10 November 2022 (attended by 51 participants of workers and contractors) - On 28 – 29 November 2022 dissemination to 34 workers 	<p>Complied</p>

		<p>- On 7 - 8 December 2022 to 15 contractors (suppliers and vendors).</p> <p>Scheme Smallholder:</p> <p>There is no change in Cooperative policy related to respecting human rights, namely:</p> <ol style="list-style-type: none"> 1. KUD Karya Bersama Policy dated August 11, 2021: "Ensuring the protection of whistleblowers/human rights defenders of acts of revenge, intimidation and harassment". This policy has been disseminated again to all members of the KUD Karya Bersama on January 3, 2023. 2. KUD Bina Usaha Baru Policy dated August 11, 2021: "Ensuring the protection of whistleblowers/human rights defenders of acts of revenge, intimidation and harassment". This policy has been disseminated again to all members of the KUD Bina Usaha Baru on January 3, 2023. 3. KUD Sawit Subur Policy dated August 11, 2021: "Ensuring the protection of whistleblowers/human rights defenders of acts of revenge, intimidation and harassment". This policy has been disseminated again to all members of the KUD Sawit Subur on January 2, 2023. 4. KUD Sumber Bahagia Policy dated August 11, 2021: "Ensuring the protection of whistleblowers/human rights defenders of acts of revenge, intimidation and harassment". This policy has been disseminated again to all members of the KUD Sumber Bahagia on January 2, 2023. <p>Based on interviews with samples of farmers during field visits, that farmers have understood about policies to respect human rights. Up to now, there were no cases related to human rights violations.</p>	
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4.1.2	<p>The unit of certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations.</p> <p>- Minor compliance -</p>	<p>Based on interview with all level of workers, contractors, scheme smallholders and stakeholders, confirm that the unit of certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations.</p>	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 affected parties.			
4.2.1	<p>(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p> <p>- Critical (Major) compliance -</p>	<p>There is no change related to the mechanism to handle complaint and grievance: <i>SOP Penanganan Keluhan dari Eksternal</i> No.AA-GL-5005-R0 01" explains mechanism to resolve external complaint. While for internal complaint/grievance is regarding complaint/grievance from employee/workers: <i>SOP Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan</i> No. AA-HR-308 0.5R0".</p> <p>Separately, the certification unit has also established a mechanism related to land conflict/dispute "<i>SOP Penanganan Konflik Lahan</i> AA-GL-5003.1-R1" effective date on 22/08/2011.</p> <p>Based on interview with several stakeholder during this audit, that there is no land conflict noted.</p> <p>Scheme Smallholder:</p> <p>There were no changes related to internal and external complaint resolution mechanisms, namely the "<i>Mekanisme Komunikasi dan Konsultasi</i>" dated January 16, 2017, in the form of a Flowchart which describes the process of incoming information requests up to the responses provided. Based on interviews with a sample of farmers, the determination of this mechanism is through a meeting of representatives from farmers and also several community leaders as external parties.</p> <p>Each farmer member has a "<i>Buku Panduan dan Catatan Petani Plasma</i>", which explains the flow of the communication process. Both written and oral communications are conveyed to the 'group management' through the Secretary of each KUD.</p>	Complied

		<p>For internal communication, the ICS Group Manager has set up a "Komunikasi Internal Group Sertifikas" procedure. SOP No. 007/DOK/SOP/PT IIS KLU-AA/2016 dated 26 November 2016. The SOP describes internal communication mechanisms regarding group members, extension workers, farmer managers and group managers. The Group Manager is responsible for responding to internal Group communications. Based on interviews with a sample of farmers at KUD Karya Bersama, KUD Bina Usaha Baru, KUD Sawit Subur and KUD Sumber Bahagia, no lawsuits were filed against the company.</p>	
<p>4.2.2</p>	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties. - Minor compliance -</p>	<p>There were no changes related to mechanism to handle complaint and grievances, namely:</p> <ol style="list-style-type: none"> 1. "SOP Penanganan Keluhan dari Eksternal No. AA-GL-5005-R0 01" explains mechanism to resolve external complaint. 2. "SOP Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan No. AA-HR-308 0.5R0" related to internal grievance mechanism for employee. 3. SOP Penanganan Keluhan Masyarakat No: AA-GL-510.1-R0, dated 1 January 2013. <p>4.1 Reporting Public Complaints</p> <p>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. "</p> <p>4.2 Procedure for Handling / Resolving Community Complaints</p> <p>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</p>	<p>Complied</p>

		<p>incident, name of the Party involved, the specific time when the event was the reason for the complaint and the basis of the complaint).</p> <p>4.2.12 "... The company will endeavour to resolve complaints within 15 working days".</p> <p>Based on interview with several of worker, union labor and the stakeholder/local community of Pontian Mekar and Air Putih Village, 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.</p>	
4.2.3	<p>The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>Based on interview with relevant stakeholders during surveillance audit, there is no grievance or conflict raised against unit of certification both company and smallholders.</p>	Complied
4.2.4	<p>The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.</p> <p>- Minor compliance -</p>	<p>Based on interview with relevant stakeholders during surveillance audit, there is no grievance or conflict raised against unit of certification both company and smallholders.</p>	Complied
<p>Criteria 4.3: The unit of certification contributes to local sustainable development as agreed by local communities.</p>			
4.3.1	<p>Contributions to community development that are based on the results of consultation with local community are demonstrated.</p> <p>- Minor compliance -</p>	<p>Based on interviews with the Management of PT IIS - Ukui Group and the Heads of Pontian Mekar Village and Airputih Village, that the preparation of the CSR program was carried out in discussions during the discussion /MUSREMBANG (Development Planning Meeting) in the village. So that the CSR program is expected to be right on target needed by the village community. MUSREMBANG for the 2023 period will be held in December 2022 (attended in person by representatives of PT IIS – Humas).</p> <p>In 2023 period, the company has established CSR program is recorded on CSR Project Tracking 2023, as follow:</p>	Complied

		<ul style="list-style-type: none"> • Social Aspect: Blood donors at Bagan Limau Village, IDR 5,000,000. • Economic Aspect: Farm assistance at Kampung baru, Air Mas, Sei berasberas Hilir Village, IDR 22,000,000. • Education Aspect: School principal capacity building training at Bagan Limau and Ukui 2 Village, IDR 17,500,000 • Health Aspect: Free health check at Silikuan Hulu Village, IDR 20,000,000 • Infrastructure Aspect: Assistance in drilling wells at Ukui 2 Village, IDR 15,000,000; Road maintenance at Air Hitam, Lubuk Kembang Sari, Bagan Limau, Silikuan Hulu, and Kampung Baru Village IDR 20,000,000. <p>The realization of the CSR program for the period 2022 – 2023 is as follows:</p> <ul style="list-style-type: none"> - 20 August 2022, Road maintenance at Air Hitam Village – 13 HM. - 29 July 2022, Assistance of heavy equipment at Air Hitam Village. - 26 April 2022, Assistance of heavy equipment -7 HM at Silikuan Hulu Village. - 16 July 2022, Assistance of heavy equipment 12 HM at Kampung Baru Village. - 19 May 2022, Assistance of heavy equipment 5 HM at Lubuk Kembang Sari Village. - 31 August 2022, donation for traditional dance Studio at Ukui 2 Village. - 25 October 2022, assistance of fish lifestock at Bagan Limau Village and Lubuk Batu, and Lilin Village. 	
<p>Criteria 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.</p>			

<p>4.4.1</p>	<p>(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed (FPIC) process. Documents related to the history of land tenure and the actual legal or customary use of the land are available.</p> <p>- Critical (Major) compliance -</p>	<p>Ukui Estate:</p> <p>Documents showing legal ownership of Ukui I POM and its supply bases are shown in place. Legal ownership of land use rights in Indonesia is recognize as "Hak Guna Usaha" or Land Title. Where the Land Title issued by National Land Department. The legal land use-rights for this scope as follow:</p> <table border="1" data-bbox="1093 536 1926 1369"> <thead> <tr> <th>Estate</th> <th>Area (Ha)*</th> <th>Land Title</th> </tr> </thead> <tbody> <tr> <td>Ukui</td> <td>3,565</td> <td>SK Ka. BPN No: 156/HGU/BPN/2004, dated 11 November 2004. Land Title certificate (HGU) No. 01/1989 for area 6,727.64 Ha located in Ukui Village. Signed by Head of National Land Agency of Pelalawan District on 18 December 1989 valid until 31 December 2019.</td> </tr> <tr> <td>KUD Sumber Makmur</td> <td>1,562</td> <td>SHM</td> </tr> <tr> <td>KUD Bina Usaha Baru</td> <td>616</td> <td>SHM</td> </tr> <tr> <td>KUD Bakti</td> <td>448</td> <td>SHM</td> </tr> <tr> <td>KUD Karya Bersama</td> <td>864</td> <td>SHM</td> </tr> <tr> <td>KUD Sawit Subur</td> <td>908</td> <td>SHM</td> </tr> <tr> <td>KUD Bina Sejahtera</td> <td>1,236</td> <td>SHM</td> </tr> <tr> <td>KUD Sumber Bahagia</td> <td>1,206</td> <td>SHM</td> </tr> <tr> <td>KUD Bukit Potalo</td> <td>494</td> <td>SHM</td> </tr> </tbody> </table>	Estate	Area (Ha)*	Land Title	Ukui	3,565	SK Ka. BPN No: 156/HGU/BPN/2004, dated 11 November 2004. Land Title certificate (HGU) No. 01/1989 for area 6,727.64 Ha located in Ukui Village. Signed by Head of National Land Agency of Pelalawan District on 18 December 1989 valid until 31 December 2019.	KUD Sumber Makmur	1,562	SHM	KUD Bina Usaha Baru	616	SHM	KUD Bakti	448	SHM	KUD Karya Bersama	864	SHM	KUD Sawit Subur	908	SHM	KUD Bina Sejahtera	1,236	SHM	KUD Sumber Bahagia	1,206	SHM	KUD Bukit Potalo	494	SHM	<p>Complied</p>
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RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

KUD Usaha Baru	494	SHM
TOTAL	11,393	

Progress of renewal HGU Certificate No. 00001/1989:

March 27, 2019
 Research / Constellation Application, in the Context of Registration for Extension of HGU Period, Number: 203 / MB-RH2 / EXT.II / 2019, dated March 27, 2019.

The letter was delivered from PT. IIS to the Head of Regional Office of the Ministry of ATR / BPN Prov. Riau, related to the extension of HGU No. 00001 of 1989 (6,727.64 Ha).

April 23, 2019
 Letter from PT. IIS to the Head of the Pelalawan Regency Land Office, concerning Application for Land Registration Certificate, Number: 022 / GL-RO2 / EXT / IV / 2019.

September 16, 2019
 Certificate of Number: 35/2019, explains that:
 A piece of land area of 6,726,255 Ha with NIB: 05.16.00.00.00007. Based on the Land Registration Document at the District Land Office. Pelalawan, the plot has been issued with a certificate with,
 On behalf of: PT. Inti Indosawit Subur
 Type and Right Number: Right to Cultivate: 00001
 Area: 6,726,255 Ha.
 Note: Based on the Decree of the Head of BPN No. 156 / HGU / BPN / 2004 dated 11-11-2004.

a. The right to cultivate has been extended for a period of 25 years from 31-12-2019 (HGU No.1 / Ukui), and registration for the

		<p>extension of the HGU period can only be carried out within a period of 2 years before the termination of rights.</p> <p>b. This right to operate has been renewed for a period of 35 years since the end of the extension of the term for the right to use the land, that is, the registration for renewal can only be carried out within a period of 2 years before the extension of the term of the rights expires.</p> <p>Reason reducing area is High Voltage Electricity (SUTET).</p> <p>May 16, 2022</p> <p>Based on the interview with BPN of Pelalawan Regency that extension of Land Title (HGU) of PT IIS-Ukui I is still in the progress or data collections. According to letter no. HP-01-03/1736-14/V/2022 dated May 13, 2022 which is response from National Land Agency Regional Office (BPN Kantor Wilayah) the Province of Riau, mention that there is still a lack of requirements as follows:</p> <ul style="list-style-type: none"> ○ Class assessment of the plantation ○ Business activities-letter statement owner ○ Benefits-proof implementation of the obligation facilitate the construction of the community for company that has not been carrying out liability at the time of the granting of the right ○ CSR implementation report. <p>1 August 2022</p> <p>Field measurement by team from <i>Kementrian Agraria dan Tata Ruang/ Badan Pertanahan Nasional Direktorat Jenderal Survei dan Pemetaan Pertanahan dan Ruang</i> based on Assignment Letter No : 409/S-300.16.1-UK.01.03/VIII/2022 dated 1 August 2022. In the letter stated that field measurement for land owned by PT Inti Indosawit Subur with total area of 6,727.64 Ha located in Pelalawan Regency.</p>	
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		<p>Progress until ASA2_2 (2023):</p> <p>Until surveillance audit (2023) conducted, the renewal of HGU still on progress. PT IIS Ukui I waiting for the field measurement result from BPN team.</p> <p>According to interview with BPN confirmed that since the HGU renewal still in progress, PT IIS – Ukui I remain valid to operate the plantation activity, in addition company has hold valid plantation business permit (Izin Usaha Perkebunan) which still valid until this moment. Plantation Permit (IUP: Izin Usaha Perkebunan-Budidaya (IUP-B) based on Surat Keputusan Bupati Pelalawan No.Kpts.525.3/Dishutbun/2013/446 dated 05/29/2013 for 3,003.73 Ha. Ijin Usaha Perkebunan-Pengolahan (IUP-P) for PT Inti Indosawit Subur dated 05/29/2013.</p> <p>Based on Government Regulation No. 40 of 1996 concerning Cultivation Rights, Building Use Rights and Land Use Rights; Article 9:</p> <p>(1) Cultivation Right Can be extended to the right applicant, if it fulfills the following requirements:</p> <ol style="list-style-type: none"> a. The land is still being managed properly in accordance with the circumstances, nature and purpose of granting the right. b. The conditions for granting these rights are fulfilled properly by the rights holders. c. The owner of the right still meets the requirements as the holder of the right. d. PT IIS Ukui 1 can extend the HGU in accordance with the above provisions because the land is still being well cultivated. 	
4.4.2	<p>Copies documents evidencing agreement- making processes and negotiated agreements detailing the FPIC process are available and include:</p> <p>- Minor compliance -</p>	<p>There are no changes of compliance statement compared to last year audit.</p> <p>PT. Inti Indosawit Subur is long-established plantation with planting year since 1990. The land use-rights already obtained since 1989. The land status is clear, and no land disputes raised. Copies of documents</p>	Not Applicable

	<p>4.4.2a Evidence that a plan has been developed through consultation and discussion held in good faith with all affected groups within the community, with specific assurances that vulnerable, minority and gender groups are asked for their opinions, and that information has been provided to all affected groups, including in it information about the steps taken to involve them in decision making.</p>	<p>evidencing agreement-making processes and negotiated agreement detailing the FPIC process are obsolete.</p>	
	<p>4.4.2b Evidence that the unit of certification has respected communities to give or withhold their consent to the operations at the time that these decisions were taken;</p>	<p>There are no changes of compliance statement compared to last year audit. PT. Inti Indosawit Subur is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. The land status is clear, and no land disputes raised. Copies of documents evidencing agreement-making processes and negotiated agreement detailing the FPIC process are obsolete.</p>	
	<p>4.4.2c Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities. Including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land.</p>	<p>There are no changes of compliance statement compared to last year audit. PT. Inti Indosawit Subur is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. The land status is clear, and no land disputes raised. Copies of documents evidencing agreement-making processes and negotiated agreement detailing the FPIC process are obsolete.</p>	
<p>4.4.3</p>	<p>(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Critical (Major) compliance -</p>	<p>There are no changes of compliance statement compared to last year audit. Ukui Estate: Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are available within HGU map namely "<i>Peta Gambar Situasi Khusus</i>". This map is attached within HGU certificate. Scheme Smallholders:</p>	<p>Complied</p>

		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.	
4.4.4	All relevant information is available in appropriate forms and languages, including assessment of impact, proposed benefit sharing, and legal arrangements. - Minor compliance -	There are no changes of compliance statement compared to last year audit. Estate: PT Inti Indosawit Subur – Ukui Group is not acquiring 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 Ukui 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. Scheme Smallholder: During field observation and interview with sample of smallholders at KUD Bina Usaha Baru, KUD Sawit Subur, KUD Karya Bersama and KUD Sumber Bahagia 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 plot already have legal use rights.	Complied
4.4.5	(C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose. - Critical (Major) compliance -	There are no changes of compliance statement compared to last year audit. Estate: PT Inti Indosawit Subur – Ukui Group is not acquiring 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 Ukui Estate, interview	Complied

		<p>with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p>Scheme Smallholder: During field observation and interview with sample of smallholders at KUD Bina Usaha Baru, KUD Sawit Subur, KUD Karya Bersama and KUD Sumber Bahagia, 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.</p>	
<p>4.4.6</p>	<p>There is evidence that implementation of agreement negotiated through FPIC is annually reviewed in consultation with affected parties.</p> <p>- Minor compliance -</p>	<p>There are no changes of compliance statement compared to last year audit.</p> <p>Estate: PT Inti Indosawit Subur – Ukui Group is not acquiring 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 Ukui Estate, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p>Scheme Smallholder: During field observation and interview with sample of smallholders at KUD Bina Usaha Baru, KUD Sawit Subur, KUD Karya Bersama and KUD Sumber Bahagia, 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.</p>	<p>Complied</p>
<p>Criteria 4.5: No new plantings are established on local peoples’ land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.</p>			

<p>4.5.1</p>	<p>(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available. - Critical (Major) compliance -</p>	<p>There are no changes of compliance statement compared to last year audit.</p> <p>Estate: Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation was made. Also, there is not acquiring of 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 Ukui Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p>Scheme Smallholder: During field observation and interview with sample of smallholders at KUD Bina Usaha Baru, KUD Sawit Subur, KUD Karya Bersama and KUD Sumber Bahagia, there is no land dispute within smallholders' area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders' plots already have legal use rights.</p>	<p>Complied</p>
<p>4.5.2</p>	<p>(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions. 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. - Critical (Major) compliance -</p>	<p>There are no changes of compliance statement compared to last year audit.</p> <p>Estate: Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation was made. Also, there is not acquiring of new land for oil palm plantation. The company does not restrict local peoples access through the main Estate roads. This was</p>	<p>Complied</p>

		<p>confirmed during interview with company representative and stakeholder consultation with local community. Based on Ukui Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p>Scheme Smallholder: During field observation and interview with sample of smallholders at KUD Bina Usaha Baru, KUD Sawit Subur, KUD Karya Bersama and KUD Sumber Bahagia, there is no land dispute within smallholders' area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders' plots already have legal use rights.</p>	
<p>4.5.3</p>	<p>Evidence is available that affected local peoples understand they have the right to say 'agree' or 'not agree' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p> <p>- Minor compliance -</p>	<p>There are no changes of compliance statement compared to last year audit.</p> <p>Estate: Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation was made. Also, there is not acquiring of 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 Ukui Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p>Scheme Smallholder: During field observation and interview with sample of smallholders at KUD Bina Usaha Baru, KUD Sawit Subur, KUD Karya Bersama and KUD Sumber Bahagia, there is no land dispute within smallholders' area since the</p>	<p>Complied</p>

		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. - Minor compliance -	There are no changes of compliance statement compared to last year audit. 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 acquiring of 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 Ukui 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 Smallholder: During field observation and interview with sample of smallholders at KUD Bina Usaha Baru, KUD Sawit Subur, KUD Karya Bersama and KUD Sumber Bahagia, 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
4.5.5	Evidence is available that the affected communities and rights holders have had the option to access information and advice, that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands. - Minor compliance -	There are no changes of compliance statement compared to last year audit. 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	Complied

		<p>origin from State Land and no land compensation was made. Also, there is not acquiring of 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 Ukui Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p>Scheme Smallholder: During field observation and interview with sample of smallholders at KUD Bina Usaha Baru, KUD Sawit Subur, KUD Karya Bersama and KUD Sumber Bahagia, there is no land dispute within smallholders' area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders' plots already have legal use rights.</p>	
<p>4.5.6</p>	<p>Evidence is available that the communities or their representatives gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.</p> <p>- Minor compliance -</p>	<p>There are no changes of compliance statement compared to last year audit.</p> <p>Estate: Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation was made. Also, there is not acquiring of 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 Ukui Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p>Scheme Smallholder:</p>	<p>Complied</p>

		During field observation and interview with sample of smallholders at KUD Bina Usaha Baru, KUD Sawit Subur, KUD Karya Bersama and KUD Sumber Bahagia, 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	<p>After 15 November 2018, new lands will not be acquired for plantations and mills as a result of recent (after November 2005) expropriations in the national interest (eminent domain) without FPIC process, except in cases of smallholders benefitting from agrarian reform or anti-drug programmes.</p> <p>- Minor compliance -</p>	<p>There are no changes of compliance statement compared to last year audit.</p> <p>Estate: Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation was made. Also, there is not acquiring of 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 Ukui Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p>Scheme Smallholder: During field observation and interview with sample of smallholders at KUD Bina Usaha Baru, KUD Sawit Subur, KUD Karya Bersama and KUD Sumber Bahagia, there is no land dispute within smallholders' area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders' plots already have legal use rights.</p>	Complied
4.5.8	<p>(C) New lands are not acquired in areas inhabited by communities in voluntary isolation.</p> <p>- Critical (Major) compliance -</p>	<p>There are no changes of compliance statement compared to last year audit.</p> <p>Estate:</p>	Complied

		<p>Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation was made. Also, there is not acquiring of 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 Ukui Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p>Scheme Smallholder:</p> <p>During field observation and interview with sample of smallholders at KUD Bina Usaha Baru, KUD Sawit Subur, KUD Karya Bersama and KUD Sumber Bahagia, there is no land dispute within smallholders' area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders' plots already have legal use rights.</p>	
<p>Criteria 4.6: Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.</p>			
<p>4.6.1</p>	<p>(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.</p> <p>- Critical (Major) compliance -</p>	<p>There are no changes of compliance statement compared to last year audit.</p> <p>Estate:</p> <p>Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation was made. Also, there is not acquiring of new land for oil palm plantation. The company does not restrict local peoples access through the main Estate roads. This was confirmed during interview with company representative and stakeholder</p>	<p>Complied</p>

		<p>consultation with local community. Based on Ukui Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p>Scheme Smallholder:</p> <p>During field observation and interview with sample of smallholders at KUD Bina Usaha Baru, KUD Sawit Subur, KUD Karya Bersama and KUD Sumber Bahagia, there is no land dispute within smallholders' area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders' plots already have legal use rights.</p>	
<p>4.6.2</p>	<p>(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	<p>There are no changes of compliance statement compared to last year audit.</p> <p>The Certificate Holder has a procedure to resolve land conflict, Standard Operating Procedure (SOP) No.AA-GL-5003.1-R2 revision 2 dated 8 May 2015 regarding Land Conflict Handling. The SOP described flow process and mechanism to handle land conflict. The SOP has taking into consideration the RUC guide for RSPO Member 2015, whereby in the SOP has regulate information land conveyance, negotiation, participatory land measurement and other activities including engagement with relevant parties and other parties neighboring the plantation and/or conflict land. Including, identifying whether customary, legal or other rights and its compensation calculation.</p> <p>Estate:</p> <p>Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation was made. Also, there is not acquiring of new land for oil palm plantation. The company does</p>	<p>Complied</p>

		<p>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 Ukui Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p>Scheme Smallholder: During field observation and interview with sample of smallholders at KUD Bina Usaha Baru, KUD Sawit Subur, KUD Karya Bersama and KUD Sumber Bahagia, there is no land dispute within smallholders' area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders' plots already have legal use rights.</p>	
<p>4.6.3</p>	<p>Evidence is available that equal opportunities are provided to both men and women to hold land titles for smallholdings (if possible based on local law, customs and/or agreement).</p> <p>- Minor compliance -</p>	<p>There are no changes of compliance statement compared to last year audit.</p> <p>Estate: Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation was made. Also, there is not acquiring of 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 Ukui Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p>Scheme Smallholder: During field observation and interview with sample of smallholders at KUD Bina Usaha Baru, KUD Sawit Subur, KUD Karya Bersama and KUD Sumber</p>	<p>Complied</p>

		Bahagia, 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, compensation and payments are documented with evidence of the participation of affected parties and made available to them. - Minor compliance -	There are no changes of compliance statement compared to last year audit. 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 acquiring of 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 Ukui 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 Smallholder: During field observation and interview with sample of smallholders at KUD Bina Usaha Baru, KUD Sawit Subur, KUD Karya Bersama and KUD Sumber Bahagia, 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
Criteria 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.			
4.7.1	(C) A mutually agreed procedure for identifying people entitled to compensation is in place.	There are no changes of compliance statement compared to last year audit.	Complied

	<p>- Critical (Major) compliance -</p>	<p>Estate: Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation was made. Also, there is not acquiring of 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 Ukui Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p>Scheme Smallholder: During field observation and interview with sample of smallholders at KUD Bina Usaha Baru, KUD Sawit Subur, KUD Karya Bersama and KUD Sumber Bahagia, there is no land dispute within smallholders' area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders' plots already have legal use rights.</p>	
<p>4.7.2</p>	<p>(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties. - Critical (Major) compliance -</p>	<p>There are no changes of compliance statement compared to last year audit.</p> <p>Ukui I Estate: 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. 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</p>	<p>Complied</p>

		<p>party and neighboring parties – in the boundary of the conflicted area (if any).</p> <p>Scheme Smallholders:</p> <p>During field observation and interview with sample of smallholders at KUD Bina Usaha Baru, KUD Sawit Subur, KUD Karya Bersama and KUD Sumber Bahagia and relevant authority, Dinas Perkebunan Kabupaten Pelalawan (plantation agency); there was no case of land conflict between smallholder member and/or conflict with other party related to land status or boundary.</p> <p>Cooperatives have a conflicts resolution mechanism in “<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.</p> <p>There is no new planting within certified area of PT Inti Indosawit Subur – Ukui 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.</p>	
4.7.3	<p>Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.</p> <p>- Minor compliance -</p>	<p>There are no changes of compliance statement compared to last year audit.</p> <p>Ukui I Estate:</p> <p>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. The mechanism has taken into account FPIC Guide for RSPO Member 2015, whereby the procedure regulated information convey, negotiation, participative boundary measurement, involvement of other party and neighboring parties – in the boundary of the conflicted area (if any).</p> <p>Scheme Smallholders:</p>	Complied

		<p>During field observation and interview with sample of smallholders at KUD Bina Usaha Baru, KUD Sawit Subur, KUD Karya Bersama and KUD Sumber Bahagia and relevant authority, Dinas Perkebunan Kabupaten Pelalawan (plantation agency); there was no case of land conflict between smallholder member and/or conflict with other party related to land status or boundary.</p> <p>Cooperatives have a conflicts resolution mechanism in "<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.</p> <p>There is no new planting within certified area of PT Inti Indosawit Subur – Ukui 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.</p>	
<p>Criteria 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrated that they have legal customary, or user rights.</p>			
<p>4.8.1</p>	<p>Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.</p> <p>- Minor compliance -</p>	<p>Ukui I Estate and Scheme Smallholders:</p> <p>Based on documents review and interview with local government and local communities surrounding the company, it was noted that no customary land or legal rights within the company and scheme smallholder’s areas.</p> <p>All company plantation and scheme smallholder areas were issued with valid land title in the form of "Hak Guna Usaha/HGU" for company and "Sertifikat Hak Milik" for smallholder.</p> <p>Field measurement by team from Kementrian Agraria dan Tata Ruang/ Badan Pertanahan Nasional Direktorat Jenderal Survei dan Pemetaan Pertanahan dan Ruang based on Assigment Letter No: 409/S-300.16.1-UK.01.03/VIII/2022 dated 1 August 2022. In the letter stated that field measurement for land owned by PT Inti Indosawit Subur with total area of 6,727.64 Ha located in Pelalawan Regency.</p>	<p>Complied</p>

		<p>Until surveillance audit (2023) conducted, the renewal of HGU is still on progress. PT IIS Ukui I is waiting for the field measurement result from BPN team.</p> <p>According to interview with BPN confirmed that since the HGU renewal still in progress, PT IIS – Ukui I remain valid to operate the plantation activity, in addition company has hold valid plantation business permit (Izin Usaha Perkebunan) which still valid until this moment. Plantation Permit (IUP: Izin Usaha Perkebunan-Budidaya (IUP-B) based on Surat Keputusan Bupati Pelalawan No.Kpts.525.3/Dishutbun/2013/446 dated 05/29/2013 for 3,003.73 Ha. Ijin Usaha Perkebunan-Pengolahan (IUP-P) for PT Inti Indosawit Subur dated 05/29/2013.</p> <p>Based on interview with sampled smallholder at KUD Bina Usaha Baru, KUD Sawit Subur, KUD Karya Bersama and KUD Usaha Baru, informed 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.</p>	
<p>4.8.2</p>	<p>(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.</p> <p>- Critical (Major) compliance -</p>	<p>There are no changes of compliance statement compared to last year audit.</p> <p>The Certificate Holder has a procedure to resolve land conflict, Standard Operating Procedure (SOP) No.AA-GL-5003.1-R2 revision 2 dated 8 May 2015 regarding Land Conflict Handling. The SOP described flow process and mechanism to handle land conflict. The SOP has taking into consideration the FPIC guide for RSPO Member 2015, whereby in the SOP has regulate information land conveyance, negotiation, participatory land measurement and other activities including engagement with relevant parties and other parties neighboring the plantation and/or conflict land. Including, identifying whether customary, legal or other rights and its compensation calculation.</p> <p>Estate:</p>	<p>Complied</p>

		<p>Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation was made. Also, there is not acquiring of 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 Ukui Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p>Scheme Smallholder:</p> <p>During field observation and interview with sample of smallholders at KUD Bina Usaha Baru, KUD Sawit Subur, KUD Karya Bersama and KUD Sumber Bahagia, there is no land dispute within smallholders' area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders' plots already have legal use rights.</p>	
4.8.3	<p>Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4).</p> <p>- Minor compliance -</p>	<p>There are no changes of compliance statement compared to last year audit.</p> <p>Estate:</p> <p>Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation was made. Also, there is not acquiring of 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 Ukui Estate area statement documents, interview with communities and stakeholder consultation,</p>	Complied

		<p>there is no land conflict noted and/or reported between company and surrounding communities.</p> <p>Scheme Smallholder:</p> <p>During field observation and interview with sample of smallholders at KUD Bina Usaha Baru, KUD Sawit Subur, KUD Karya Bersama and KUD Sumber Bahagia, there is no land dispute within smallholders' area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders' plots already have legal use rights.</p>	
4.8.4	<p>For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable).</p> <p>- Minor compliance -</p>	<p>There are no changes of compliance statement compared to last year audit.</p> <p>The Certificate Holder has a procedure to resolve land conflict, Standard Operating Procedure (SOP) No.AA-GL-5003.1-R2 revision 2 dated 8 May 2015 regarding Land Conflict Handling. The SOP described flow process and mechanism to handle land conflict. The SOP has taking into consideration the FPIC guide for RSPO Member 2015, whereby in the SOP has regulate information land conveyance, negotiation, participatory land measurement and other activities including engagement with relevant parties and other parties neighboring the plantation and/or conflict land. Including, identifying whether or not customary, legal or other rights and its compensation calculation.</p> <p>Estate:</p> <p>Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation was made. Also, there is not acquiring of new land for oil palm plantation. The company does not restrict local peoples access through the main Estate roads. This was confirmed during interview with company representative and stakeholder</p>	Complied

		<p>consultation with local community. Based on Ukui Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p>Scheme Smallholder:</p> <p>During field observation and interview with sample of smallholders at KUD Bina Usaha Baru, KUD Sawit Subur, KUD Karya Bersama and KUD Sumber Bahagia, there is no land dispute within smallholders' area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders' plots already have legal use rights.</p>	
<p>Principle 5: Support smallholder inclusion</p>			
<p>Include smallholders in RSPO supply chains and improve their livelihoods through fair and transparent partnerships.</p>			
<p>Criteria 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.</p>			
<p>5.1.1</p>	<p>Current and previous period prices for FFB are publicly available and accessible by smallholders.</p> <p>- Minor compliance -</p>	<p>Based on interview with management representative during ASA2_2, 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.</p> <p>During the ASA2_2 audit, Kebun Plasma Ukui showed the FFB payment receipt period April 2023 in accordance with official FFB price that issued by FFB Pricing Team of Riau Province (for planting years under 25). However for the planting years in most of the KUD/smallholders are classified as over 25 years, so the price is lower than official FFB price, the price is follows the market price. The official price of FFB from Disbun is only regulates up to the age of the plant 25 years. The lower FFB prices has been agreed by the smallholders, the calculation has considered the OER KER material balance for OP > 25 years (bunch analysis), so that prices remain competitive.</p>	<p>Complied</p>

		Sighted the payments record of KUD Sumber Bahagia, KUD Bina Usaha Baru, KUD Sawit Subur and KUD Karya Bersama period April 2023. All payments have been complied with the pricing that stipulated by FFB Pricing Team of Riau Province.	
5.1.2	<p>(C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.</p> <p>- Critical (Major) compliance -</p>	Based on document verification of Memorandum of Understanding (MoU) during ASA2_2 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 2023 on behalf KUD Sumber Bahagia, KUD Bina Usaha Baru, KUD Sawit Subur and KUD Karya Bersama.	Complied
5.1.3	<p>(C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.</p> <p>- Critical (Major) compliance -</p>	<p>Based on interview with management during ASA2_2, it was known that management of PT Inti Indosawit Subur – Ukui Group has commitment to share the RSPO premium price in accordance with the agreement with their smallholder. Premium sharing is not distributed in cash of money but in the form of smallholder empowerment activities aimed at increasing the competence and competitiveness of smallholders based on participatory suggest from the smallholders.</p> <p>During this audit obtained information that the premium sharing for Ukui Plasma period 2021/2022 has been distributed in July 2022. Ukui Plasma using that fund for coaching programs, namely as follows:</p> <ul style="list-style-type: none"> • Providing PPE for harvester • Installation of boundary poles • Alternative income (cattle) • Purchasing the stationery and office equipment. <p>The program continues the previous program in Y2021.</p>	Complied

		Based on interview with the smallholder’s representatives known that the programs have given positive impact for the members.	
5.1.4	<p>(C) Evidences is available that all parties, including women and independent representative organization assisting smallholders where requested, are involved in the decision making processes and understand the contracts. These include involving finance, loans/credits, and re-payments through FFB price reductions for replanting and/or, other support mechanisms where applicable.</p> <p>- Critical (Major) compliance -</p>	Based on document review and interview to the management, it was known that 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	<p>Contracts are fair, legal and transparent and have an agreed timeframe.</p> <p>- Minor compliance -</p>	<p>Contracts are fair, legal and transparent and have an agreed timeframe, as seen in indicator 2.2.2.</p> <p>Based on interview during ASA2_2 with management representative i.e. public affair staff, sustainability and plasma manager obtained information that all the contract including scheme smallholders and FFB suppliers are signed by both parties, the contracts are fair, legal and transparent and have an agreed timeframe.</p> <p>During this audit, management unit has several contracts related to third parties as follows:</p> <p>Mill:</p> <ol style="list-style-type: none"> 1. CV Sumber Kencana (CPO/PK/CPKO Transporter) 2. CV Jasa Sahabat Abadi (CPO/PK/CPKO Transporter) 3. CV Jaya Pertama (CPO/PK/CPKO Transporter) 4. CV Teman Setia (CPO/PK/CPKO Transporter), Agreement Letter No. 08/VI/TS-IIS/2020 dated 4 June 2020. 5. PT Buana Jaya Bersama (CPO/PK/CPKO Transporter), Agreement Letter No. 03/VI/BJB-IIS/2020 dated 4 June 2020. 	Complied

		<p>Ukui Estate:</p> <ol style="list-style-type: none"> Jaya Barus (EFB transporter), Agreement Letter No. 001/E2KUK/I/23 dated 1 January 2023, valid until 31 December 2023. Gunawan (EFB Transporter), Agreement Letter No. 002/E2KUK/I/23 dated 1 January 2023, valid until 31 December 2023. <p>Smallholder:</p> <p>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, sighted the annual FFB-Transporter contract between KUD Sumber Bahagia with Mr Tarimin, KUD Bina Usaha Baru with Mr. Hariman, KUD Sawit Subur with Mr Andi and KUD Karya Bersama with Mr. Hendro. Those three persons was (FFB-Transporter representatives).</p> <p>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.</p>	
5.1.6	<p>(C) Agreed payments are made in a timely manner and receipts specifying price, weigh, deductions and amount paid are given.</p> <p>- Critical (Major) compliance -</p>	<p>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 in April 2023 for KUD Sumber Bahagia, KUD Bina Usaha Baru, KUD Sawit Subur and KUD Karya Bersama.</p> <p>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.</p>	Complied

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<p>5.1.7</p>	<p>Weighing equipment is verified by an independent third party on a regular basis.</p> <p>- Minor compliance -</p>	<p>PT IIS Ukui I POM have 2 (two) weighing bridges, the weighbridge has been verified by government agency annually. Latest verification was performed on 12 September 2022 by UPTD Metrologi Legal Dinas Perindustrian dan Perdagangan, Kabupaten Pelalawan. Weighbridge's calibration certificate sighted during audit as follows:</p> <ul style="list-style-type: none"> • Surat Keterangan Hasil Pengujian Nomor: 510.3/DKUKMPP-UM/SKHP/2022/156, dated 12 September 2022, valid until 12 September 2023. Weighbridge Avery weigh Tronix; Serial Number 184350013; Type: ZM510; Capacity 50,000 kg. • Surat Keterangan Hasil Pengujian Nomor: 510.3/UPTMET/SKHP/2022/155, dated 12 September 2022, valid until 12 September 2023. Weighbridge Avery weigh Tronix; Serial Number 210950522; Type: ZM510; Capacity 50,000 kg. <p>According to certificate it was noted that verification results were comply to requirement, endorsed based on UU RI No. 2 Year 1981 concerning Metrology Legal.</p> <p>Field visit was also carried out, it was known that the weighing equipment was in good condition.</p>	<p>Complied</p>
<p>5.1.8</p>	<p>The unit of certification supports Independent smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholder on who runs the Internal Controlling System (ICS), who holds the certificate, and who owns and sells certified materials.</p> <p>- Minor compliance -</p>	<p>Based on review of agreement, the company carried out the development and provide supervision in KUD (scheme smallholder). The company support in Y2022/2023 namely supports ISH "Asosiasi Petani Sawit Swadaya Anugrah" for RSPO Certification, the assistances in form of supervision in upkeep, fertilizer application, harvesting, land legality, FFB transport and implementation of RSPO P&C requirements.</p>	<p>Complied</p>
<p>5.1.9</p>	<p>(C) The unit of certification has a grievance mechanism for smallholders, and all grievances raised are dealt with in a timely manner.</p> <p>- Critical (Major) compliance -</p>	<p>Since 2019, the complaint mechanism has not changed, both internal complaints and complaints from external parties (stakeholders), namely: "Stakeholder Complaint Handling Mechanism" dated 22 April 2019 including smallholder farmers (scheme smallholders or independent smallholders).</p>	<p>Complied</p>

		<p>The Company has also provided a channel to report violations of the principles and objectives, by sending an email to whistleblow@rgei.com or calling (+62) 81 2755 2528.</p> <p>Based on document review and interview to the sample members during ASA2-2, it was known that there is no complaint by the smallholders raised since May 2022 until April 2023.</p>	
<p>Criteria 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.</p>			
<p>5.2.1</p>	<p>The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification.</p> <p>- Minor compliance -</p>	<p>PT IIS-Ukui Group always communicates with interested smallholders including women farmers to support their livelihoods especially those related to RSPO certification.</p> <p>Some of the company's activities that can be considered as supporting activities towards interested smallholders, among them:</p> <ul style="list-style-type: none"> • OHS (Basic Safety) socialization, conducted on 11 & 15 August 2020, attended by 34 farmers. • First Aid Training, conducted on 25 November 2020, attended by 164 farmers. • Basic Fire, conducted on 10 October 2020, attended by 136 farmers. • Limited Pesticide Application, conducted on 25 November 2020, attended by 164 farmers. • Weed Control, conducted on 9 December 2020, by attended by 74 farmers. • Fertilizer Application, conducted on 9 December 2020, attended by 74 farmers. • Integrated Pest Management, conducted on 9 December 2020, attended by 74 farmers. • OHS (Basic Safety), conducted on 9 October 2021, attended by 30 farmers. 	<p>Complied</p>

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		<ul style="list-style-type: none"> • 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. <p>PT IIS Ukui Group has also provided assistance to the Asosiasi Petani Sawit Swadaya Anugrah (independent smallholders) in the certification process. Assistancess through the Ukui Group CSV Team. The CSV team provides assistance by placing 1 Assistant and 1 Supervisor in each KUD. One of the CSV work programs is to provide guidance related to plantation management including harvesting, manuring, IPM, legality. The last monitoring has carried out in April 2023.</p>	
5.2.2	<p>The unit of certification develops and implements livelihood improvement programmes, including at least capacity building to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder).</p> <p>- Minor compliance -</p>	<p>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:</p> <ul style="list-style-type: none"> • Refresh of Best Management Practises (Harvesting including sortation, Manuring, Spraying including pesticides handling) on 10 October 2022, attended by 30 farmers, 24 August 2022 attended by 25 members. • OHS (PPE), conducted on 10 October 2022, attended by 30 farmers. • Environmental Management, conducted on 10 October 2022, attended by 30 farmers. 	Complied
5.2.3	<p>Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.</p> <p>- Minor compliance -</p>	<p>Ukui I Mill supplied by own estates (Ukui Estate), smallholder from 9 KUD's with total 3,914 smallholders and third party's supplier. Based on interview with smallholder representatives from KUD Sumber Bahagia, KUD Bina Usaha Baru, KUD Sawit Subur, and KUD Karya Bersama obtain information that entire land has been granted by government (private land title/SHM).</p>	Complied

		<p>According to the signboard in mill's gate, Ukui I POM does not accept FFB from illegal sources (forest area or crop stolen). All FFB from third parties shall comply with regulation. Mill's staff told that FFB Purchasing Department has set the procedures for their supplier as follows:</p> <p>Asian Agri's through his subsidiary PT. Inti Indosawit Subur fully supported their smallholder to be certified by ensuring all FFB come from legal sources and comply with national regulation. They also conducted good engagement to demonstrated best management practices in agronomy, environmental handling and safety procedures. For example, each plot was received 6 units barn owl box to help them control rat population.</p> <p>During the ASA2_2 audit, auditor also obtain information that PT. Inti Indosawit Subur are now assisting the smallholders on replanting project in collaborated with local government. This aims to ensure that farmers produce palm oil sustainably. In other, PT IIS Ukui Group also assisting the Independent Smallholder – Asosiasi Petani Sawit Swadaya Anugrah for RSPO Certification.</p>	
<p>5.2.4</p>	<p>(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -</p>	<p>Certificate Holder has assigned chemical weeding team (<i>Tim Unit Semprot/TUS</i>) in each estate/unit to handling chemical weeding activity. The team member originated from own workers (for own estate) and local communities (for smallholder). They regularly attended training on pesticide handling that conducted by the pesticide supplier in collaboration with local pesticide committee.</p> <p>Based on document review and interview during ASA2_2 with random pesticide applicator known that they were attending the last training on pesticide handling on 24 May 2019 and refresh training in October 2022. Some topics that discuss such as pesticide handling, national regulation related to pesticide, symbol and label awareness and emergency procedure if any contamination or poisonous.</p> <p>During the audit, auditor also interviewed some smallholder representatives and obtain information that the company has provide</p>	<p>Complied</p>

		<p>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.</p>	
<p>5.2.5</p>	<p>The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme. - Minor compliance -</p>	<p>Annual review of progress of the smallholder support by Asian Agri's can be see and downloaded in Asian Agri's website https://www.asianagri.com/id/panel-keberlanjutan/laporan-keberlanjutan. That document is publicly available.</p> <p>Plasma manager (KLU) also described that PT Inti Indosawit Subur also helped the smallholder based on monthly management review of smallholder performance as follows:</p> <ul style="list-style-type: none"> • Assisted the KUD's to achieve the production and upkeep target. Until this audit, plasma area has been achieved 4 % above the target. • Assisting the KUD's in replanting program. Until this audit, there is a record of approval by smallholder members in some KUD's. PT Inti Indosawit Subur as agreed to be bank guarantor for the financial scheme of replanting. • assisting the Independent Smallholder (ISH) – Asosiasi Petani Sawit Swadaya Anugrah for RSPO Certification. <p>Based on field visits and interviews with smallholder representatives, each KUD's has been supported in IPM program. They are equipped with beneficial plants and barn owl boxes (6 units each plot). Certificate Holder also conducted training in order to ensure the smallholder's competency. For example:</p> <ul style="list-style-type: none"> • Refresh of Best Management Practises (Harvesting including sortation, Manuring, Spraying including pesticides handling) on 10 October 2022, attended by 30 farmers, 24 August 2022 attended by 25 members. • OHS (PPE), conducted on 10 October 2022, attended by 30 farmers. • Environmental Management, conducted on 10 October 2022, attended by 30 farmers. 	<p>Complied</p>

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.			
6.1.1	<p>(C) A publicly available non-discrimination and equal opportunity policy is implemented in such way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.</p> <p>- Critical (Major) compliance -</p>	<p>Since 2019, the company policy of PT Inti Indosawit Subur – Ukui Group has not changed, namely “Company Policy”, dated December 1, 2019: “Treat all employees fairly, both in terms of acceptance, assessment of working conditions and the environment, and representation regardless of ethnicity. , caste, national origin, religion/belief, disability, gender, sexual orientation, union membership, political affiliation and/or age” - to treat all cooperative members fairly, and respect human rights, and representation without discrimination on ethnicity, race, caste, country of origin, religion/belief, disability, gender, sexual orientation, trade union affiliation, political affiliation or age. This policy has been communicated to all workers at Ukui Estate.</p> <p>Promotions and advancements are based on employee appraisals which are carried out every year as outlined in the Employee Appraisal Form which is signed by the employee concerned, approved by the line manager and checked by the General Manager. The form shows that there is no indication of employment discrimination in terms of ethnicity, caste, religion, disability, gender, sexual orientation, trade union membership, political affiliation and/or age.</p> <p>Based on interviews with management and verification of documents, that there is no discrimination against employees in the recruitment process as well as promotion or appointment of employees as permanent employees.</p> <p>Smallholder scheme</p> <p>Until now, the ICS Policy has not changed, namely the "Group Manager Policy" dated January 3, 2020, which was signed by the Ukui Group ICS Group Manager, in point 9 it states "Respect for human rights, and</p>	Complied

		<p>representation regardless of ethnicity, caste, national origin , religion/belief, disability, gender, sexual orientation, union membership, political affiliation and/or age” – treating all cooperative members fairly, and respecting human rights, and representation without discrimination on ethnicity, race, caste, country of origin , religion/belief, disability, gender, sexual orientation, trade union affiliation, political affiliation or age.</p> <p>This policy has been disseminations to all worker, stakeholder and second party (contractor) as well as follow:</p> <ul style="list-style-type: none"> - On 18 – 20 October 2022 (attended by 33 participants of workers of Ukui Estate and contractors as well), - On 8 - 10 November 2022 (attended by 51 participants of workers and contractors) - On 28 – 29 November 2022 dissemination to 34 workers - On 7 - 8 December 2022 to 15 contractors (suppliers and vendors). <p>Based on field visits to a sample of farmer members at KUD Bina Usaha Baru, KUD Sawit Subur, KUD Sawit Karya Bersama and KUD Usaha Baru, they understand the ICS Policy.</p>	
<p>6.1.2</p>	<p>(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against. Evidence includes migrant workers non-payment of recruitment fees.</p> <p>- Critical (Major) compliance -</p>	<p>Based on interviews during this surveillance audit, May 2023, that workers know that there are no discriminatory practices at PT IIS. During audit conducted document verification: salary payment documents for April 2023 and Master list of employees, that no evidence of discrimination was found.</p> <p>Workers and groups including local communities and women workers do not experience discrimination</p>	<p>Complied</p>
<p>6.1.3</p>	<p>The unit of certification demonstrates that the recruitment selection, hiring access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p>	<p>Consistently, PT Inti Indosawit Subur – Ukui Group has demonstrated commitment that recruitment selection, recruitment access to training and</p>	<p>Complied</p>

	<p>- Minor compliance -</p>	<p>promotions are based on skills, abilities, quality, and medical fitness, such as:</p> <ul style="list-style-type: none"> • The company has developed procedures for recruiting workers, arranging the appointment and promotion of workers based on skills, work experience, and job evaluation. • In the recruitment process, the company has set competency standards contained in the Job Profile and Job Profile. Recruitment, hiring and promotion selection is based on skill, ability, quality and medical fitness. • Employment opportunities are communicated and provided to residents of surrounding villages as first priority where no discrimination was found during interviews and records regarding employed workers. All workers are treated the same according to company regulations, including workers' rights. Compliance with national legislation has been evaluated by the organization as described in criterion 2.1. The annual employee performance evaluation results for the 2022 period have been demonstrated. • All discrimination is prohibited for all plantation and mill areas. PKB also mentions the prohibition of discrimination for all workers in the organization. • The manpower recruitment procedure (HR-A-001-00) and the manpower assessment procedure (HRD C-002-00) are available and stipulate that there is no discriminatory treatment during the recruitment and promotion process. Employee promotions will be carried out based on years of service, annual evaluation results, and position availability. <p>Promotions and advancements are based on employee appraisals which are carried out every year as outlined in the Employee Appraisal Form which is signed by the employee concerned, approved by the line manager and checked by the General Manager.</p>	
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		<p>The form shows that there is no indication of employment discrimination in terms of ethnicity, caste, religion, disability, gender, sexual orientation, trade union membership, political affiliation and/or age.</p> <p>In the 2022-2023 period there is no employee recruitment process.</p>	
6.1.4	<p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p> <p>- Minor compliance -</p>	<p>PT Inti Indosawit Subur – Ukui Group has committed to prohibiting pregnant or breastfeeding women from spraying chemicals. To overcome this, the estate conducts a pregnancy test every month.</p> <p>The implementation of this policy can be seen in the activity of checking workers' pregnancy. The company has conducted a Pregnancy Test (pregnancy test) every month. During the audit, 11 female workers verified the monitoring and checking documents for the pregnancy of female employees for the period January - April 2023.</p> <p>The last pregnancy test was carried out "Monitoring Pregnancy Tests for Workers or Spraying Workers" in January - April 2023. All female sprayers are in good condition and are not pregnant or breastfeeding, for example: Mother. Yarmina Lila, Mrs. Mariana Giawa, Mrs. Awidar Hulu, Mrs. Efrida Yanti, Mrs. Ernawati Laila, Mrs. Asri Fajar and Mrs. Trisiwi – the results were negative.</p>	Complied
6.1.5	<p>(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>- Critical (Major) compliance -</p>	<p>A gender committee was available in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>PT Inti Indosawit Subur – 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.</p> <p>Implemented policy on prevention of sexual harassment and violence against women, the policy is prominently displayed on notice boards at the Ukui I Mill and Ukui Estate.</p>	Complied

		<p>Based on interviews with female staff, Head of gender committee (Mrs. Yuliana Sarifah) and union representatives confirmed that the company implemented the sexual harassment policy.</p> <p>The program of Gender Committee of PT Inti Indosawit Subur - Ukui Group year 2023, these included:</p> <ol style="list-style-type: none"> a. Special activities: <ul style="list-style-type: none"> • Conduct clean Friday activities. • 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): <ul style="list-style-type: none"> • Conduct regular meetings at least 2 times a year with company management. • If there is a case related to employees, communication will be carried out with company management in order to find a solution (discussion). • Socialization related to sexual harassment and violence against the women. c. Strengthening organizational institutions: Coordinating with trade unions to assist with female employee complaints. <p>Scheme Smallholders (KUD Bina Usaha Baru, KUD Sawit Subur, KUD Karya Bersama, KUD Usaha Baru):</p> <p>Plasma Ukui Group has demonstrated the policy to prevent sexual harassment and violence against women in "Kebijakan ICS Group Manager" issued dated 3rd January 2020, in chapter 11 was stated</p>	
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		<p>"Mencegah pelecehan seksual dan berbagai bentuk kekerasan terhadap perempuan serta melindungi hak-hak reproduksinya (prevent sexual harassment and violence as well as protect reproductive rights for women)".</p> <p>The policy has communicated to all scheme smallholder's member and displayed in publication board in each KUDs office (KUD Bina Usaha Baru, KUD Sawit Subur, KUD Karya Bersama, KUD Usaha Baru).</p> <p>Based on interview with management, there is no issues raised related gender, discrimination and/or harassment since year 2022 and 2023</p>	
6.1.6	<p>There is evidence of equal pay for the same work scope.</p> <p>- Minor compliance -</p>	<p>The application of wages is based on Decree of Keputusan Gubernur Riau No. Kpts.1783/XII/2022", dated 07/12/2022 for Upah Minimum Kabupaten/Kota in Province of Riau is IDR 3,287,623.60/month.</p> <p>The company composes the structure and scale of the 2023 wage period based on Permenaker No. 1 of 2017. This wage scale structure is a determination of the number of wages for permanent workers (SKU-B) based on class, rank/position.</p> <p>The Company has already set wage standard based on wages set by the government recorded on Memorandum no. ###/HR-R01/MEMO/01/2023, dated 12 January 2023; regarding: "Kenaikan Upah Pekerja Golongan SKUB" and the determination of the daily wage for BHL (Daily workers) and PKWT employees (certain time workers). On this memorandum is also determine regarding structure of wage for each level worker (SKU-H and AKU-B). The company is also giving a scripts/slip salary to employees before salary is given, salary slip also contains basic salary, allowances, premium, labor health coverage (BPJS Ketenagakerjaan and Kesehatan) and deduction as well.</p> <p>As for the period of 2022: wage determination based on the Decree of the Governor of Riau Year 2021, No. Kpts.1272/XI/2021 dated 30 November 2021 related to minimum wages for Y2022. The amount of</p>	Complied

		<p>basic wage based on the decision letter for Pelalawan Regency amounted to IDR 3,030,598.54 per month.</p> <p>For Y2023, taken sample of salary slip for period Mar – April 2023. 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 as per Decree of the Governor of Riau Year 2022, No. Kpts.1783/XII/2022 dated 07/12/2022. Please see 6.2.2</p>	
<p>Criteria 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).</p>			
<p>6.2.1</p>	<p>(C) Documentation of pay and working conditions in accordance with applicable labour laws are available to the workers in national languages and explained to them in language they understand.</p> <p>- Critical (Major) compliance -</p>	<p>The Company already has Collective Work Agreement (PKB) period 2022-2024. PKB is binding for all SKU-H and SKU-B levels. The PKB is valid for 2 years and build in Indonesian language.</p> <p>The PKB document regulates provisions regarding working time, wage system, assistance for sick days, absenteeism, tour of external services, overtime work, and payment of allowances while in the hold of state equipment. PKB is also provisions regarding premiums, payment of holiday allowances and bonuses, guarantees Social and Social Assistance, Work Equipment and Occupational Safety, Acceptance, Transfer of Promotions and Layoffs, Provisions for motorized vehicles for workers and educators, Company and Worker Obligations, Manpower Settlement Methods and the Termination of Company Regulations.</p> <p>Article V (Wages) regulates:</p> <ul style="list-style-type: none"> ▪ Wages ▪ Rice / Natura Supply Allowances ▪ Provisions concerning who is entitled to receive a rice supply, and ▪ Dependent of workers. <p>The Company has already set wage standard based on wages set by the government recorded on Memorandum no. ###/HR-R01/MEMO/01/2023, dated 12 January 2023; regarding: "Kenaikan Upah</p>	<p>Complied</p>

		<p><i>Pekerja Golongan SKUB'</i> and the determination of the daily wage for BHL (Daily workers) and PKWT employees (certain time workers). This memorandum also determines the structure of wage for each level worker (SKU-H and SKU-B). The company is also giving a scripts/slip salary to employees before salary is given, salary slip also contains basic salary, allowances, premium, labor health coverage (<i>BPJS Ketenagakerjaan and Kesehatan</i>) and deduction as well.</p> <p>As for the period of 2023: wage determination based on the Decree of the Governor of Riau Year 2022, No. Kpts.1783/XII/2022 dated 07/12/2022. The amount of basic wage based on the decision letter for Pelalawan Regency amounted to IDR 3,287,623.60 per month.</p> <p>The company makes payments to workers by transferring accounts to each worker, before the payday, the company will make and give pay slips to the foreman to be given to workers.</p> <p>The salary slip contains information in Indonesian, containing among others:</p> <ul style="list-style-type: none"> - Basic salary - Allowances / premiums - Overtime pay - <i>BPJS Kesehatan and Ketenagakerjaan</i> membership fees. - Pension - And other deductions (if any) <p>Taken sample of salary slip for period April 2023. Based on sample salary slip, confirmed that the company has paid wages employees salary according to the working days and it is applied in a fair to all employees:</p> <ul style="list-style-type: none"> - Salary Receipt on behalf of the Su*a*ti as Upkeep Worker (manuring), working day 11, basic salary IDR 1,333,464, premium IDR 30,000 subtotal IDR 1,363,464 deduction; <i>BPJS Ketenagakerjaan</i> IDR 60,612, <i>BPJS Kesehatan</i> IDR 32,876, subtotal IDR 93,488, Net salary 	
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		<p>IDR 1,269,976.</p> <ul style="list-style-type: none"> - Salary Receipt on behalf of the Ma*an*s Gul* upkeep worker, working day 18, basic salary IDR 2,182,032, harvest premium IDR 1,487,797, deduction; BPJS Ketenagakerjaan IDR 60,612, BPJS Kesehatan IDR 32,876, subtotal IDR 93,488, Net salary IDR 3,616,341. - Salary Receipt on behalf of the Yen* Atih*d* upkeep worker, working day 15, basic salary IDR 1,818,360, harvest premium IDR 75,000, deduction; BPJS Ketenagakerjaan IDR 60,612, BPJS Kesehatan IDR 32,876, subtotal IDR 93,488, Net salary IDR 1,799,872. - Salary Receipt on behalf of the Rah*m*d harvester, working day 19, basic salary IDR 3,030,600, harvest premium IDR 2,870,604, deduction; BPJS Ketenagakerjaan IDR 60,612, BPJS Kesehatan IDR 63,182, subtotal IDR 93,488, Net salary IDR 4,842,910. - Salary Receipt on behalf of the Sup*ri*nt* harvester, working day 20, basic salary IDR 3,030,600, harvest premium IDR 2,436,314, deduction; BPJS Ketenagakerjaan IDR 60,612, BPJS Kesehatan IDR 63,182, subtotal IDR 93,488, Cooperative Deduction IDR 3,483,000, Net salary IDR 1,898,120. <p><i>Note: wage adjustments to the minimum wage Y2023 will be given at payroll at the end of May 2023 (for period January – April 2023).</i></p> <p>Based on slip/payroll on March – April 2023 period verification, that the provisions contained in the payroll/wage slip are based on applicable laws and regulations, i.e. Law no.13 of 2003 and Law No.11 of 2021 and PP No. 35 of 2021 concerning remuneration.</p>	
6.2.2	<p>(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed.</p>	<p>The PKB document regulates provisions regarding working time, wage system, assistance for sick days, absenteeism, tour of external services, overtime work, and payment of allowances while in the hold of state equipment. PKB is also provisions regarding premiums, payment of holiday allowances and bonuses, guarantees Social and Social Assistance, Work Equipment and Occupational Safety, Acceptance, Transfer of</p>	<p style="text-align: center;">Non-compliance</p>

	<p>- Critical (Major) compliance -</p>	<p>Promotions and Layoffs, Provisions for motorized vehicles for workers and educators, Company and Worker Obligations, Manpower Settlement Methods and the Termination of Company Regulations.</p> <p>Based on verification of documents and interviews with workers stated that each worker has a Work Agreement with companies made in Indonesian as a language understood by all ethnic groups in PT IIS -UKUI Group. The Work Agreement Letter regulates Position, validity period and expiration of employment agreement, Obligations of workers, Placement/Transfer/Transfer, Payroll, Treatment, Annual leave, Worker Guarantee, Termination of employment, termination of employment and others.</p> <p>The employment contract has explained the related period of agreement, wages and payment (IDR. 131,504.95 per day in accordance with the Governor's Decree on Wages in 2023), 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:</p> <ul style="list-style-type: none"> • Employment Contract - <i>Perjanjian Kerja Harian Lepas</i> (PHL) no. 005/KUK/SPK/08/2022, dated 1 August 2022 on behalf of Wira for position Upkeep Worker, valid until 21 August 2023. • Employment Contract - <i>Perjanjian Kerja Harian Lepas</i> (PHL) no. 005/KUK/SPK/08/2022, dated 1 February 2023 on behalf of Dimas for position Upkeep Worker, valid until February 2024. <p>Based on slip/payroll on March – April 2023 period verification, that the provisions contained in the payroll/wage slip are based on applicable laws and regulations, i.e. Law no.13 of 2003 and Law No.11 of 2021 and PP No. 35 of 2021 concerning remuneration.</p> <p>Ukui Smallholder:</p> <p>Farmer members of Kebun Plasma Ukui did not directly conduct the spraying work and handle the pesticide/herbicide. Spraying works and</p>	
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6.2.3	<p>(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, and other legal labour requirements.</p>	<p>The 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</p>	Complied

	<p>- Critical (Major) compliance -</p>	<p>holiday allowances and bonuses, guarantees Social and Social Assistance, Work Equipment and Occupational Safety, Acceptance, Transfer of Promotions and Layoffs, Provisions for motorized vehicles for workers and educators, Company and Worker Obligations, Manpower Settlement Methods and the Termination of Company Regulations.</p> <p>Based on verification of documents and interviews with workers stated that each worker has a Work Agreement with companies made in Indonesian as a language understood by all ethnic groups in PT IIS -UKUI Group. The Work Agreement Letter regulates Position, validity period and expiration of employment agreement, Obligations of workers, Placement/Transfer/Transfer, Payroll, Treatment, Annual leave, Worker Guarantee, Termination of employment, termination of employment and others.</p> <p>The employment contract has explained the related period of agreement, wages and payment (IDR 3,287,623.60/month in accordance with the Governor's Decree on Wages in 2023), 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.</p> <p>For the work hours and overtime, based on document verification of the pay slip and interview to the workers, it was known that the work hours and overtime has meet to the regulation (PP 35/2021).</p>	
6.2.4	<p>(C) The unit of certification provides adequate housing. Sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	<p>The company has prepared facilities for the workers, including the basic needs such as electricity and water. Detail of company facilities for employees are as follows:</p> <ul style="list-style-type: none"> - Ukui I Mill Housing, consist of Type B (2 units), type C (5 units), type D (14 units), Type E (86 units), - Ukui Estate Housing, consist of Type B (3 units), Type C 22 units), type D (26 units), type E (454 units) - Polyclinic (1 unit), 	Complied

		<ul style="list-style-type: none"> - 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), - The water supply is clean. Water quality is being checked and monitored on a regular basis. <p>Based on field visits to the employee housing area, the company is carrying out repairs or repainting programs for employee homes and replacing damaged roofs. The company has budgeted costs for housing repairs and other public facilities through annual budgeting. The housing is sufficient for all workers.</p>	
6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p>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). The company is also accommodating weekly market for each estate; Sunday for Ukui Estate.</p> <p>Smallholder:</p> <p>The farmer member villages are a developed Transmigration Village. Provision of food can be obtained from existing markets in the village. Based on the results of field visits to the sample villages indicate that in the village was available weekly markets and stalls that provide basic necessities.</p>	Complied
6.2.6	<p>A DLW is paid to all workers in accordance with applicable regulations, including workers who work on a piece rate/quota basis, the</p>	<p>Ukui Group:</p>	Complied

	<p>calculation of which is based on a quota that can be achieved during regular working hours.</p> <p>- Minor compliance -</p>	<p>The application of wages is based on Decree of Keputusan Gubernur Riau No. Kpts.1783/XII/2022", dated 07/12/2022 for Upah Minimum Kabupaten/Kota in Province of Riau is IDR 3,287,623.60/month.</p> <p>The company composes the structure and scale of the 2023 wage period based on Permenaker No. 1 of 2017. This wage scale structure is a determination of the number of wages for permanent workers (SKU-B) based on class, rank/position.</p> <p>In general, the UKUI Group including smallholders have calculated the Decent Living Needs using the calculation method as set out in the "RSPO Guidance for Implementing a Decent Living Wage", June 1, 2019. The company has conducted an account of the DLW for the 2023 period with data drawn from each Estate and POM.</p> <p>Based on the verification of documents the results of the 2023 DLW calculation shows that total cost and kind benefit for average is IDR 993,688, average monthly take home salary per worker is IDR 3,327,367 and total value of prevailing wage is IDR 4,321,055.</p> <p>Scheme Smallholder:</p> <p>Calculation of DLW Cooperative employees' period 2020, DLW Calculation of Family Workers (K-3) KUD.</p> <p>Based on the verification of documents the results of the 2023 DLW calculation shows that the Gross of DLW is IDR 6,196,061.04.</p> <p>Piece rate/quotas calculation has been calculated based on the achievement of 7 working hours in accordance with applicable regulations (UU No. 13/2003) and UU No. 11/2021 UU <i>Cipta Kerja</i>, for example:</p> <p>Calculation of labor harvest in Plasma:</p> <ul style="list-style-type: none"> - Ability to harvest power for 7 hours per day: 3,000 kg - Harvest area: 4 hectares - Job performance in 1 hour 429 kg / hour 	
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<p>PROCEDURAL NOTE:</p> <p>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.</p> <p>In the meantime, until DLW benchmark for Indonesia is endorsed by the RSPO, the unit of certification carries out interim measures that was published by RSPO (dated 11 November 2019), including:</p> <ol style="list-style-type: none"> 1. Payment of minimum wages in accordance with applicable regulations 2. Assessment of wages paid (prevailing wages) and in-kind benefits. <p>Once the DLW benchmark is available, this procedural note is no longer applicable.</p>			
6.2.7	<p>Permanent fulltime employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.</p> <p>- Minor compliance -</p>	<p>Based on the verification of employee data for May 2023 period, PT IIS – Ukui I POM has permanent and non-permanent employees (SKU and PHL).</p>	Complied

		<p>The unit certification has identified those related to the main work in oil palm plantations based on the Circular Letter from GAPKI dated 8 February 2013 No. 073/GAPKI/II/2013 concerning the Circular on the Activity Flow of the Work Implementation Process in the Oil Palm Plantation Business Sector, stating that; only 2 (two) jobs that are the main activities in the Oil Palm Plantation industry, namely harvesting and processing products, the rest are supporting activities in accordance with <i>Permenakertrans No. 19/2012</i> which implementation can be left to other parties.</p> <p>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:</p> <p>Based on interview with HRD during ASA2_2 it was revealed that a mechanism for recruiting daily worker, especially harvesters as permanent workers with a probationary period of 3 months is carried out. This is in accordance with applicable laws and regulations exist in Indonesia, namely Law No. 11 of 2021 the "UU Cipta Kerja/Job Creation Law" and Perpu No. 6 of 2023.</p> <p>Company has promoted the Appointment of PHL harvesters as follow:</p> <p>Estate</p> <p>Year 2022</p> <ul style="list-style-type: none"> - Semester I of 2022: Appointment of 9 harvesters of PHL workers - Semester II of 2022: Appointment of 9 PHL workers <p>Year 2023</p> <ul style="list-style-type: none"> - Semester I of 2023: appointment of 9 harvesters as PHL - Semester II of 2023 there are 40 harvesters who will be evaluated every 3 months as a trial period. 	
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<p>Criteria 6.3: The unit of certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			
<p>6.3.1</p>	<p>(C) A published statement recognizing freedom of association and right to collective bargaining in national languages is available and is explained to all workers in languages that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	<p>PT Inti Indosawit Subur – Ukui Group has company policy signed by Managing Director on 1st December 2019. The policy stated the company guarantees freedom of association or be part of worker union as well as collective bargaining.</p> <p>The policy has been disseminated to all employees by installing signboard of company policy and by direct dissemination.</p> <p>In 2022 to 2023, PT Inti Indosawit Subur - Ukui Group had communicated the policy on code of ethical conduct to worker, village communities and contractors, such as:</p>	<p>Complied</p>

		<ul style="list-style-type: none"> • In Ukui I POM – the socialization was on 8 – 9 February 2023 – subject: training for company policy, that was attended by 64 workers. • In Ukui Estate – the socialization was on 2 – 5 February 2023 – subject: training for company policy, that was attended by 201 workers. <p>PT Inti Indosawit Subur – Ukui Group have labour union, namely “<i>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</i>” as per “<i>Surat Keputusan Pengurus Cabang Federasi SPPP-SPSI Kabupaten Pelalawan No. Kep. 18-A/PC-FSP.PP/K-SPSI/PLLW/9/2022</i>” dated 9 March 2023 - and valid for 5 years.</p> <p>Based on interview with Labour Union (obtained information that the company’s policy above has been disseminated in Bahasa Indonesia to all of workers during morning briefing or through the signboard that installed in public area (office, housing complex, store, and morning briefing station).</p> <p>Scheme Smallholder:</p> <p>Ukui scheme smallholder has had organization’s policy: “<i>Kebijakan Manajer Group ICS</i>” dated 11 August 2020. Related to the freedom of association, it has mentioned on point 12: “<i>Menghormati setiap karyawan KUD atau petani untuk membentuk atau menjadi anggota serikat pekerja serta berkumpul dan berserikat atau berorganisasi</i>”. This policy is made in Bahasa Indonesia, this is to facilitate understanding by all farmers.</p> <p>The policy has been disseminated to all smallholder members. Cooperative sample → KUD Bina Usaha Baru, KUD Sawit Subur, KUD Karya Bersama, KUD Usaha Baru</p>	
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<p>6.3.2</p>	<p>Minutes of meetings between the unit of certification with trade unions or worker representatives who are freely elected, are documented in the national languages and available upon request.</p> <p>- Minor compliance -</p>	<p>PT Inti Indosawit Subur – Ukui I POM has shown the commitment that management does not interfere with the formation or operation of registered labour organizations/unions, or other freely elected representatives for all workers, including contract workers.</p> <p>Based on interview with representative of worker union during ASA 2_2-year 2023, there is declare that the company does not interfere with the formation or operation of registered labor organizations/unions. The worker freely to choose and form union elected representatives for all workers.</p> <p>Labour Union has regularly met with company representative. Minutes of the meeting for the meeting on 17 January 2023, a meeting to discuss related: minimum wage year 2023 and discussing regarding employee bonuses.</p>	<p>Complied</p>
<p>6.3.3</p>	<p>Management does not interfere with the formation or operation of registered labour organizations/unions, or other freely elected representatives for all workers, including migrant and contract workers.</p> <p>- Minor compliance -</p>	<p>PT Inti Indosawit Subur – Ukui Group has company policy signed by Managing Director on 1st December 2019. The policy stated company guarantee freedom of association or be part of worker union as well as collective bargaining.</p> <p>The policy has been disseminated to all employees by installing signboard of company policy and by direct dissemination.</p> <p>In 2022 to 2023, PT Inti Indosawit Subur - Ukui Group was communicating the policy on code of ethical conduct to worker, village communities and contractors, such as:</p> <ul style="list-style-type: none"> • In Ukui I POM – the socialization was on 8 – 9 February 2023 – subject: training for company policy, that was attended by 64 workers. • In Ukui Estate – the socialization was on 2 – 5 February 2023 – subject: training for company policy, that was attended by 201 workers. <p>Based on interview with representative of worker union in Ukui Estate there is declare that the company does not interfere with the formation or operation of registered labor organizations/unions - SPSI PT Inti</p>	<p>Complied</p>

		Indosawit Subur – Ukui Group. The worker freely to choose and form union elected representatives for all workers.	
Criteria 6.4: Children are not employed or exploited.			
6.4.1	<p>A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.</p> <p>- Minor compliance -</p>	<p>PT Inti Indosawit Subur – Ukui Gorup 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 does not allowed all children to work in each activity in operational.</p> <p>The policy has been disseminated to all employees by installing signboard of company policy and by direct dissemination.</p> <p>In 2022 to 2023, PT Inti Indosawit Subur - Ukui Group was communicating the policy on code of ethical conduct to worker, village communities and contractors, such as:</p> <ul style="list-style-type: none"> • In Ukui I POM – the socialization was on 8 – 9 February 2023 – subject: training for company policy, that was attended by 64 workers. • In Ukui Estate – the socialization was on 2 – 5 February 2023 – subject: training for company policy, that was attended by 201 workers. <p>Based on verification of employee data, updated in May 2023 there was shown that no indication of worker with age below 18 years old during recruitment or at the present time.</p> <p>The youngest workers namely Mr Z*ky*(PHL – in Ukui Estate) birthdate 16 April 2003 and joined on 1 June 2022 or at age 19 years and 2 months.</p> <p><u>Scheme Smallholders:</u></p> <p>Group Manager has established the formal policy for the protection of children, including prohibition of child labour and remediation as per Cooperative Policy – “<i>Kebijakan Koperasi</i>” date 11 August 2020, in point 10 was stated “<i>Melarang anak-anak bekerja dalam setiap kegiatan</i></p>	Complied

		<p><i>operational kebun'</i> – prohibit the children to works in operational smallholders.</p> <p>Based on document verification has shown that no indication of using child labour or worker under 18 years old.</p> <p>The youngest workers namely Mr G*nd* - harvester at KUD Bina Usaha Baru date of birth 17 September 1998 (dated of joined 1 April 2021), 23 years old and 5 months.</p>	
6.4.2	<p>(C) Documented evidence on the fulfilment of worker’s minimum age requirements in accordance with applicable regulation and verification procedures for age requirements, are available.</p> <p>- Critical (Major) compliance -</p>	<p>Ukui I POM and Estate:</p> <p>PT Inti Indosawit Subur – Ukui Group has established the Company Policy dated 1 December 2019, that stated there is not allowed all children to work in every activities/process in company.</p> <p>Data verified:</p> <ol style="list-style-type: none"> 1. Darwin Lalosa (PHL – division IV), birthdate 17 January 2003 and joined on 21 November 2022 or at age 20 years and 9 months. 2. Feredi Buulolo (PHL – division II), birthdate 4 May 2004 and joined on 4 November 2022 or at age 19 years and 6 months. 3. M. Dalfa Fahlevi (PHL – Ukui POM), birthdate 12 February 2001 and joined on 1 September 2020 or at age 19 years and 6 months. <p>Scheme Smallholder:</p> <p>Based on verification of employees register (harvester and manuring workers) and document of employments agreement (Surat Perjanjian Bersama) of KUD Bina Usaha Baru, KUD Sawit Subur, KUD Karya Bersama, KUD Usaha Baru, there were found that a minimum age are met (the youngest of harvester born year 1984 – based on ID verification).</p>	Complied
6.4.3	<p>(C) Young person maybe employed only for non-hazardous work with protective restrictions in place for that work.</p> <p>- Critical (Major) compliance -</p>	<p>Ukui POM and Estate and Scheme Smallholder:</p> <p>As outlined in indicator 6.4.1, the company has a policy on the Prohibition of Child Labor as outlined in the company's code of ethical conduct.</p>	Complied

		<p>Based on verification of worker documents for period March 2021 in each Estate and Mill, there are no workers who are less than 18 years of age when hired as workers.</p>	
<p>6.4.4</p>	<p>The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.</p> <p>- Minor compliance -</p>	<p>PT Inti Indosawit Subur – Ukui Group has established the Company Policy dated 1 December 2019, that stated there is not allowed all children to work in every activities/process in company.</p> <p>The policy has been disseminated to all employees by installing signboard of company policy and by direct dissemination.</p> <p>In 2022 to 2023, PT Inti Indosawit Subur - Ukui Group was communicating the policy on code of ethical conduct to worker, village communities and contractors, such as:</p> <ul style="list-style-type: none"> • In Ukui I POM – the socialization was on 8 – 9 February 2023 – subject: training for company policy, that was attended by 64 workers. • In Ukui Estate – the socialization was on 2 – 5 February 2023 – subject: training for company policy, that was attended by 201 workers. <p>Based on document verification has shown that no indication of using child labour or worker under 18 years old.</p> <p>The youngest workers namely Mr Z*ky*(PHL – in Ukui Estate) birthdate 16 April 2003 and joined on 1 June 2022 or at age 19 years and 2 months.</p> <p><u>Scheme Smallholder:</u></p> <p>Based on document verification has shown that no indication of using child labour or worker under 18 years old.</p> <p>The youngest workers namely Mr G*nd* - harvester at KUD Bina Usaha Baru date of birth 17 September 1998 (dated of joined 1 April 2021), 23 years old and 5 months.</p>	<p>Complied</p>
<p>Criteria 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.</p>			

<p>6.5.1</p>	<p>(C) A policy to prevent sexual and all other form of harassment and violence is documented, implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>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 1st December 2019 the policy was state that to prevent any sexual or physical abuses happen to women as well as to protect their reproductive rights).</p> <p>The policy has been disseminated to all employees by installing signboard of company policy and by direct dissemination.</p> <p>In 2022 to 2023, PT Inti Indosawit Subur - Ukui Group was communicating the policy on code of ethical conduct to worker, village communities and contractors, such as:</p> <ul style="list-style-type: none"> • In Ukui I POM – the socialization was on 8 – 9 February 2023 – subject: training for company policy, that was attended by 64 workers. • In Ukui Estate – the socialization was on 2 – 5 February 2023 – subject: training for company policy, that was attended by 201 workers. <p>PT Inti Indosawit Subur – Ukui Group have a gender committee actively meets and discussing general agenda and other issue related to handling sexual harassment, dissemination of sexual harassment prevention.</p> <p>Implemented policy on prevention of sexual harassment and violence against women, the policy is prominently displayed on notice boards at the Mills and the Estates muster areas. Interviews of female staff, workers and union representatives confirmed that the company implemented the sexual harassment policy.</p> <p>Based interview with Gender Committee, in 2022 – 2023 there was no cases of sexual harassment and violence against women reported.</p> <p><u>Scheme Smallholders:</u></p> <p>Plasma Ukui Group has demonstrated the policy to prevent sexual harassment and violence against women in “<i>Kebijakan ICS Group</i></p>	<p>Complied</p>
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		<p><i>Manager” issued dated 11 August 2020, in chapter 11 was stated “Mencegah pelecehan seksual dan berbagai bentuk kekerasan terhadap perempuan serta melindungi hak hak reproduksinya (prevent sexual harassment and violence as well as protect reproductive rights for women)”.</i></p> <p>The policy has communicated to all scheme smallholder’s member and displayed in publication board in each KUDs office.</p> <p>Cooperative sample → KUD Bina Usaha Baru, KUD Sawit Subur, KUD Karya Bersama, KUD Usaha Baru</p>	
<p>6.5.2</p>	<p>(C) A policy to protect the reproductive rights of all, especially of women, is documented, implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>PT Inti Indosawit Subur – Ukui Group has established a policy to protect the reproductive rights as it is found in Company Policy that’s signed by Managing Director, dated 1st December 2019, the policy was state that to prevent any sexual or physical abuses happen to women as well as to protect their reproductive rights).</p> <p>The policy has been disseminated to all employees by installing signboard of company policy and by direct dissemination.</p> <p>In 2022 to 2023, PT Inti Indosawit Subur - Ukui Group was communicating the policy on code of ethical conduct to worker, village communities and contractors, such as:</p> <ul style="list-style-type: none"> • In Ukui I POM – the socialization was on 8 – 9 February 2023 – subject: training for company policy, that was attended by 64 workers. • In Ukui Estate – the socialization was on 2 – 5 February 2023 – subject: training for company policy, that was attended by 201 workers. <p>PT Inti Indosawit Subur – Ukui Group have a gender committee actively meets and discussing general agenda and other issue related to handling sexual harassment, dissemination of sexual harassment prevention.</p> <p>Implemented policy on prevention of sexual harassment and violence against women, the policy is prominently displayed on notice boards at the Mills and the Estates muster areas. Interviews of female staff, workers</p>	<p>Complied</p>

		<p>and union representatives confirmed that the company implemented the sexual harassment policy.</p> <p>PT Inti Indosawit Subur – Ukui Group regularly performs monitoring of pregnancy in monthly bases. Sample seen → Report of pregnancy test month April 2023, there were reported no workers in pregnant condition (negative detection) both in Ukui Estate</p> <p><u>Scheme Smallholders:</u></p> <p>Plasma Ukui Group has demonstrated the policy to prevent sexual harassment and violence against women in “<i>Kebijakan ICS Group Manager</i>” issued dated 11 August 2020, in chapter 11 was stated “<i>Mencegah pelecehan seksual dan berbagai bentuk kekerasan terhadap perempuan serta melindungi hak hak reproduksinya</i> (prevent sexual harassment and violence as well as protect reproductive rights for women)”.</p> <p>The policy has communicated to all scheme smallholder’s member and displayed in publication board in each KUDs office.</p> <p>Cooperative sample → KUD Bina Usaha Baru, KUD Sawit Subur, KUD Karya Bersama, KUD Usaha Baru</p>	
6.5.3	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified in accordance with applicable regulations in Indonesia.</p> <p>- Minor compliance -</p>	<p>Ukui POM and Estate and Scheme Smallholder:</p> <p>For breastfeeding mothers and having children under 5 years, the company has provided childcare (<i>TPA: Tempat Penitipan Anak</i>) 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 their baby.</p> <p>The company has conducted a survey of several mothers who are still breastfeeding regarding their wishes and expectations as employees who have babies under 5 years of age. This survey was carried out in collaboration between the head of the gender committee and the company's polyclinic (doctors and nurses). The survey was conducted on</p>	Complied

		<p>around 12 female employees who had just had babies and were still breastfeeding. From the results of the survey, several things were found to be the hopes of these new mothers, including:</p> <ul style="list-style-type: none"> - Health insurance for babies and their mothers. - Monitoring / monitoring of babies every month. - Counseling related to maternal and child health. - Improved maternal and child nutrition. 	
<p>6.5.4</p>	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, as long as the complaint is supported with adequate information, is documented, implemented and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p>	<p>There were no changes related to mechanism to handle complaint and grievances, namely:</p> <ul style="list-style-type: none"> • "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. <p>Mechanism for complaints management where it needs to protect its confidentiality for complaint submitter was found in the company policy's draft as in one of the points of this policy stated that:</p> <p><i>"To provide appropriate information for those who inquire about it and to protect its confidentiality for whistle blower cases in accordance with law regarding environmental and social issues, food safety, health and work safety, so that it enables them to more participate in the decision making processes for improving company's performance".</i></p> <p>Based on interviews with several village heads, government agencies and other stakeholders, that until the surveillance audit was carried out, there were no external complaints from stakeholders including related to sexual harassment.</p>	<p>Complied</p>
<p>Criteria 6.6: No forms of forced or trafficked labour are used.</p>			

<p>6.6.1</p>	<p>(C) All work is voluntary and the following are prohibited:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports; • Payment of recruitment fees; • Contract substitution without worker’s consent • Involuntary overtime; • Lack of freedom of workers to resign • Penalty for termination of employment, unless the unit of certification and the workers agree to the penalty and it is stated in the employment agreement • Debt bondage • Withholding of wages <p>- Critical (Major) compliance -</p>	<p>During audit and according to work contract, confirmed that all work is voluntary and there is no:</p> <ul style="list-style-type: none"> - Retention of identity documents or passports; - Payment of recruitment fees; - Contract substitution without worker’s consent - Involuntary overtime; - Lack of freedom of workers to resign - Penalty for termination of employment, unless the unit of certification and the workers agree to the penalty and it is stated in the employment agreement - Debt bondage - Withholding of wages <p>No form of forced labor occurs in PT IIS – Ukui Group. Company has a policy to comply with manpoer regulation UU No. 13 Tahun 2003 and UU no. 11 Tahun 2021 relate to UU Cipta Kerja.</p> <p>Company also has a policy to prevent and prohibit the forced labor as per “Kebijakan Perusahaan” signed by Managing Director on 1st December 2019. Stated in Company Policy point 17 “<i>Tidak memberikan pekerjaan dibawah ancaman, sanksi atau hukuman dimana pekerja tidak memiliki kebebasan untuk menyepakati pelaksanaan pekerjaan</i>”.</p>	<p>Complied</p>
<p>6.6.2</p>	<p>(C) Where temporary (Specified Time Work Agreement/PKWT) or migrant workers are employed, a specific labour policy and procedures are established and evidence of implementation is available.</p> <p>- Critical (Major) compliance -</p>	<p>There is no migrant workers in PT IIS – Ukui Group and there is no PKWT workers.</p> <p>For permanent workers, term and condition Company has agreement in PKB which contain term and condition for workers.</p> <p>For casual workers contract available in “<i>Perjanjian Kerja Harian Lepas</i>”.</p>	<p>Complied</p>

		<p>Labour policy is provided in “Kebijakan Perusahaan” and procedure to manage the workers are available in SOP AA-HR-305.2 – RO Rekrutmen dan Seleksi Karyawan, dated 1 February 2009.</p> <p>PT 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.</p>	
Criteria 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.			
6.7.1	<p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p>PT Inti Indosawit Subur – Ukui Group has appointed responsible person for Health and Safety as per P2K3 (Safety Committee). P2K3 has been validated by Manpower Office of Riau Province.</p> <p>Sample seen during ASA 2_2, such as:</p> <ul style="list-style-type: none"> • “Decree of the Minister of Manpower of the Republic of Indonesia Number 6/8672/AS.02.04/IV/2022 concerning Appointment of General Occupational Safety and Health Expert on behalf of Mr Keni Jupen Hutagalung” dated 19 April 2022, valid for 3 year (until September 2023) • OHS Committed based on Keputusan Kepala Dinas Tenaga Kerja dan Transmigrasi Provinsi Riau, No. KEP/159/Disnakertrasn-PK/SK-P2K3/IV/2023 regarding “Pengesahan Panitia Pembinaan Keselamatan dan Kesehatan Kerja (P2K3) PT Inti Indosawit Subur – Ukui I POM, dated 18 April 2023. • The OHS Committee (P2K3) regular meeting has been performed monthly, discussed regarding OHS program achievement and corrective actions to achieve target and improve the program. Notes of Safety Committee Regular Meeting (mill and estate) with workers 	Complied

		<p>were evident. Sample seen → last meeting was carried out on 5th May Agenda: discussed regarding OHS plan achievement and corrective actions to achieve target and improve the program, personal protective equipment (PPE), and accident review and report.</p> <ul style="list-style-type: none"> • Report of OHS Performance and Monitoring (Laporan P2K3) was submitted to Manpower Agency in Riau → sample seen: Laporan P2K3 January – March 2023 PT Inti Indosawit Subur – Ukui Group, was reported on 15 April 2023. <p><u>Scheme smallholders:</u> 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. Cooperative sample → KUD Bina Usaha Baru, KUD Sawit Subur, KUD Karya Bersama, KUD Usaha Baru</p>	
<p>6.7.2</p>	<p>Accident and emergency procedures in Indonesian language are in place and clearly understood by all workers. Assigned operatives trained in first aid are present in both field and other operations. First aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>During ASA 2_2, PT Inti Indosawit Subur – Ukui Group has defined the procedure for emergency response under Standar Operatonal Procedure – Environmental Field Procedure, such as:</p> <ul style="list-style-type: none"> • <i>No. AA-KL-11-EFP tentang Penangnan Tumpahan di Laboratorium</i> • <i>No. AA-KL-14-EFP tentang Pengendalian Kebakaran Lahan</i> • <i>No. AA-KL-16-EFP tentang Pengendalian Tumpahan B3 dan Limbah B3</i> • <i>No. AA-KL-17-EFP tentang Pengendalian Ledakan Boiler, Tabung Gas dan Lainnya</i> • <i>No. AA-KL-18-EFP tentang Pengendalian Gempa Bumi, Banjir dan Tanah Longsor</i> • <i>No. AA-KL-19-EFP tentang Tanggap Darurat Kabut Asap</i> <p>PT Inti Indosawit Subur – Ukui Group has also prepared the procedure on work accident under "Standard Operasional Prosedur – Investigasi</p>	<p>Complied</p>

		<p>Kecelakaan Kerja nomor AA-SMK3-18001.02-R0", revision 0 dated 1st April 2018. The procedure described that:</p> <ul style="list-style-type: none"> • The roles and responsibilities of each emergency response team personnel, include the mechanism how to conduct medical evacuation to nearest hospital/local health centre. • Emergency contact number of each internal emergency team and external related parties were evident. • Evacuation route and muster point are available and made known to the employee. <p>The training record related to emergency response, such as:</p> <ul style="list-style-type: none"> • Report on training of emergency response and preparedness (fire drill), dated 5th March 2023. Location in "Lapangan Ukui Estate". The training was attended by OHS Committee 52 personnel. Data verified: scenario, attendance list, evaluation, and photograph. • Record of training for first aider dated 14th January 2023, location in Ukui I POM. Data verified: Training material, attendance list and photograph. <p>The audit team has field observation to harvesting, spraying and upkeep activities in estates and to FFB processing activities at mill as well, first aid equipment are available and sufficient. At field, first aid kit brought by the Mandor (supervisor), whilst at mill, first aid kit located at office and processing station.</p>	
6.7.3	<p>(C) Workers use appropriate personal protective equipment (PPE) which is provided free of charge to all workers in the workplace, to cover all potentially hazardous operations, such as pesticides application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p>	<p>PT Inti Indosawit Subur – Ukui Group has demonstrated that workers use appropriate Personal Protective Equipment (PPE) which is provided free of charge to cover all potentially hazardous operations, such as pesticides application, machine operations, land preparation, and harvesting. Sanitation facilities called "Rumah Bilas" for those applying pesticides are available, so that workers can change out of PPE, wash, and put on their personal clothing.</p>	Complied

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	<p>- Critical (Major) compliance -</p>	<p>Data verified:</p> <ul style="list-style-type: none"> • Report of MCU was conducted on 7-8 March 2023 Focus Clinical Laboratory – Pekanbaru. Data seen: MCU for 21 workers handling with chemical, such as pesticide, herbicide, and fertilizer applicator and for PIC in pesticides storage. • Report of OHS Inspection, e.g., availability of fire extinguisher and hydrant, PPE and first aid kit, dated 6th May 2023. • Record of PPE provision for workers as per “Formulir Berita Acara Serah Terima APD”, dated 8th April 2023 for 31 workers in Ukui Estate • Monitoring of emergency response and preparedness facilities, i.e.: fire hydrant. Based on field visit in Ukui I POM dated 4th February 2023, the performance of hydrant was well. • PPE monitoring – “Inspeksi Kedisiplinan Pemakaian APD” dated 12th April 2023 located at Ukui Estate – Division IV; reported OK (all workers using PPE as required at risk assessment) • Record of OHS meeting dated 6th May 2023, location in Ukui I POM. The meeting was attended by OHS committee. Agenda: discussed regarding OHS plan achievement and corrective actions to achieve target and improve the program, personal protective equipment (PPE), and accident review and report. • Report on training of emergency response and preparedness (fire drill), dated 5th March 2023. Location in “Lapangan Ukui Estate”. The training was attended by OHS Committee 52 personnel. Data verified: scenario, attendance list, evaluation, and photograph. • Record of training for first aider dated 14th January 2023, location in Ukui I POM. Data verified: Training material, attendance list and photograph. 	
6.7.4	<p>All workers are provided medical care and covered by accident insurance. Costs incurred from work related incidents, leading to injury or illness, are covered in accordance with applicable regulations or by</p>	<p>PT Inti Indosawit Subur – Ukui Group provide all workers will medically care, and covered by accidents insurance, covered all normative rights for employee, such as salary as lined out in minimum wage for province level,</p>	<p>Complied</p>

<p>the unit of certification if applicable regulations do not provide protection. - Minor compliance -</p>	<p>leave entitlement, employees registered with social insurance for worker (BPJS), benefit for religious festival, provision of facilities (housing, electricity, clean water, medical clinic, school/school bus, worship house, personal protective equipment and working tools.</p> <p>Based on interview with sample workers during field visit and consultation with labor union, they were stated all workers are provided with medical care and accident under BPJS Kesehatan (health insurance) and BPJS Ketenagakerjaan (accident insurance). An accident insurance is covered under "BPJS Ketenagakerjaan" with Accident and Life Program (JKK and JK).</p> <p>According to Employee Database February 2023:</p> <ul style="list-style-type: none"> • Ukui I POM: total employees covered by accident insurance (BPJS Ketenagakerjaan) is 92 employees (including PHL). Status PAID • Ukui Estate: total employees covered by accident insurance (BPJS Ketenagakerjaan) is 532 employees (including PHL). Total IDR **,474,695 <p>PT Inti Indosawit Subur – Ukui Group has provided regular medical check-up for workers in high risk such as sprayer team, fertilizer applicator, workshop worker and mill operators. Last Report of MCU was conducted on 7-8 March 2023 Focus Clinical Laboratory – Pekanbaru. Data seen: MCU for 21 workers handling with chemical, such as pesticide, herbicide, and fertilizer applicator and for PIC in pesticides storage.</p> <p><u>Scheme smallholders:</u></p> <p>The government covers medical insurance for smallholders, and it is optional. Based on interview with smallholders, most of farmers/smallholders has had insurance (BPJS Kesehatan Mandiri).</p> <p>Data verified: Evidence of payment period for BPJS TK and BPJS KS (medical insurance) month January – May 2023.</p>	
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<p>6.7.5</p>	<p>Occupational injuries are recorded using Lost Time Accident (LTA) metrics. - Minor compliance -</p>	<p>PT Inti Indosawit Subur – Ukui Grpup has shown the record of injuries using lost time accident (LTA) metrics as in “Rekapitulasi Kejadian Kecelakaan Kerja– LTA” year 2022.</p> <ul style="list-style-type: none"> • Ukui 1 POM, there was an accident reported year 2022, lost time accidents were 2 mandays. • Ukui Estate, year 2022 there was 2 accidents reported, lost time is 5 mandays. <p>The Lost Time accidents and injuries were determined according to Decree of the Minister of Manpower and Transmigration No. 609 year 2012. In 2022 up to June 2022, there was no accident occurred. This accident report has been reported to Manpower Agency through OHS Committee report.</p> <p>All the accidents have been followed up with investigation records and recommendation. The investigation has completed with accident insurance claims records. Those cases already reported and claim to accident insurance services (<i>BPJS Ketenagakerjaan</i>).</p> <p><u>Scheme Smallholders</u></p> <p>The record of injuries is shown under document of “Monitoring Kecelakaan Kerja 2022”, in 2022 up to May 2023 there were no injuries cases (Nil). Based on interview with sample of smallholder member, there were no injuries cases occurred.</p> <p>Cooperative sample → KUD Bina Usaha Baru, KUD Sawit Subur, KUD Karya Bersama, KUD Usaha Baru</p>	<p>Complied</p>

Principle 7: Protect the environment, conserve biodiversity and ensure sustainable management of natural resources.

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

<p>7.1.1</p>	<p>(C) IPM plans are implemented and monitored to ensure effective pest control. - Critical (Major) compliance -</p>	<p>Ukui Estate: According to the Agricultural Policy Manual SOP AA-APM-OP-1100.10. R6 <i>Pengendalian Hama dan Penyakit</i> (Pests & Disease Control), certificate holder has plan to implement integrated pest management, during ASA2_2 there is no change of SOP "Pest and Disease Control". According to the interview with pest control officer in Ukui Estate obtain information that management has had a schedule to regularly monitored pest attack (census) as follows:</p> <ul style="list-style-type: none"> • Census of caterpillar/bag worm by monthly basis. • Census of <i>Ganoderma</i> annually. • Census rat infestation by recap the record of sortation in loading ramp. • Census of Barn Owl Box occupation in three monthly bases. <p>The last census in Ukui Estate has been conducted in second week of March 2023. Result of census shows that pest attack still under control (below the economic threshold) which is limit 5%. During the field visit in own estate (Ukui Estate Block C89b Afdeling 3) and smallholder's area (KUD Sumber Bahagia, KUD Bina Usaha Baru, KUD Sawit Subur, and KUD Karya Bersama), visually there was no issues related to the outbreak or attack. The organization was used of natural predator (<i>Tyto alba</i>) to reduce a rat infestation. There is 1 barn owl box for each farmer group/Kelompok Tani in KUD Sumber Bahagia, KUD Bina Usaha Baru, KUD Sawit Subur, and KUD Karya Bersama.</p>	<p>Complied</p>
<p>7.1.2</p>	<p>Invasive species are not to be used according to applicable regulation in managed areas, unless plans to prevent and monitor their spread are implemented. - Minor compliance -</p>	<p>During ASA2_2, it was known that the company still 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.</p>	<p>Complied</p>

7.1.3	<p>There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities.</p> <p>- Minor compliance -</p>	<p>Based on document verification at estate and scheme smallholders, interview to the management PT IIS, stakeholders and head of KUD/Head of farmer group and members and also field observation in estate and scheme smallholders during ASA2_2 obtained information that there is no record use of fire for pest control.</p>	Complied
Criteria 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.			
7.2.1	<p>(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p> <p>- Critical (Major) compliance -</p>	<p>Ukui Estate</p> <p>Based on document review during ASA2_2 it was known that the 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 spp</i>), <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 calculation of actual area implemented per hectare plantation (spray factor), spraying rotation and spraying output.</p> <p>The pesticides used by the company are for weed control and specific pest. Spraying works were conducted by selected spraying on specific target, for example weeds spraying on circle, path and collecting point (TPH). Other areas beside specific area was 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.</p> <p>During the audit, found some pesticide list that usually used with active ingredients such as <i>triklofir</i>, <i>methyl metsulfuron</i>, <i>diuron</i> and <i>glyphosate</i>.</p> <p>Type of pesticide use by Ukui Estate and its weeds target for period Y2022 and 2023 are as example below:</p>	Complied

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Agrochemical	Active ingredients	Register No.	Weeds target
Kenlon 480 EC	Trikolpir Bitoksi Etil Ester 480 g/l	RI.01030120062433 Valid until: 31 Dec 2023	Wood
Metaprima 20 WDG	Methyl Metsulfuron: 20%	RI. 01030120031897 Valid until: 31/12/2027	Broadleaf weed
Gulmaron 80 WP	Diuron: 80%	01030119981413 Valid until: 31/12/2023	broadleaf weeds (<i>Borreria latifolia</i> , <i>Asystasia intrusa</i> , <i>Clidemia hirta</i> , <i>Mikania micrantha</i>) and narrow leaf weeds (<i>Imperata cylindrica</i> , <i>Cyperus rotundus</i> , <i>Cyclosorus aridus</i>)
Supremo 480SL	IPA glifosat: 480g/l	RI. 01030120021712 Valid until: 27/06/2027	broadleaf weeds (<i>Ageratum conyzoides</i> , <i>Cleome rutidospermae</i> , <i>Paspalum conjugatum</i> , <i>Ageratum conyzoides</i>)
Polydor 25EC	Lamda sihalotrin: 25g/l	RI. 01010120041994 Valid until: 31/12/2023	Insecticide

The 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.

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

		<p>methods and eradication, pesticide characteristic, and procedures of application (spraying volume, calibration, chemical weeding interval, target and sprayer maintenance).</p> <p>During field visit audit at Block C89d Afd. IV Ukui Estate found some pesticide list that used with active ingredients such as Supremo (<i>Glyphosate</i>) and Metaprima (<i>Methyl metsulfuron</i>). The activity is paths and circles spraying.</p> <p>Scheme Smallholder:</p> <p>During the ASA2_2 audit, sighted the list of pesticide recommendation (by active ingredients) that can used by smallholder such as <i>isopropyl amine glyphosate</i>, and <i>methyl metsulfuron</i>. During Y2022/Y2023, the smallholders used pesticide with active ingredients <i>isopropyl amine glyphosate</i>, and <i>methyl metsulfuron</i>. There is no record of paraquat dichloride usage in Y2022/2023.</p>	
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<p>7.2.2</p>	<p>(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per Ha and number of applications) are provided. - Critical (Major) compliance -</p>	<p>Certificate holder has showed the record of LD50 calculation in each unit based on amount of pesticide used. Ukui Estate has calculated the LD50 of each pesticide in a monthly basis based on amount of active ingredients applied per Ha and number of applications.</p> <p>Ukui Estate Y2023</p> <table border="1"> <thead> <tr> <th>Brand</th> <th>Active Ingredient</th> <th>LD50</th> <th>Total Used</th> <th>Total Active Ingredient</th> <th>Ratio Active Ingredient/ Ha</th> <th>Ratio per Kg production</th> </tr> </thead> <tbody> <tr> <td>Kenlon 480EC</td> <td>Trychlopyr butoxy ethyl ester</td> <td>500</td> <td>388</td> <td>186.24</td> <td>0.178</td> <td>0.000</td> </tr> <tr> <td>Meta Prima</td> <td>Methyl metsulfuron</td> <td>5000</td> <td>14.7</td> <td>7.056</td> <td>0.007</td> <td>0.000</td> </tr> <tr> <td>Gulmaron</td> <td>diuron</td> <td>2000</td> <td>2</td> <td>0.96</td> <td>0.000</td> <td>0.000</td> </tr> <tr> <td>Supremo 480SL</td> <td>Isopropil amina glifosat</td> <td>5000</td> <td>2,255</td> <td>1,082.4</td> <td>1.033</td> <td>0.000</td> </tr> <tr> <td>Polydor 25 EC</td> <td>Lamda sihalotrin</td> <td>2625</td> <td>5</td> <td>6</td> <td>0.068</td> <td>0.000</td> </tr> </tbody> </table> <p>Y2022</p> <table border="1"> <thead> <tr> <th>Brand</th> <th>Active Ingredient</th> <th>LD50</th> <th>Total Used</th> <th>Total Active Ingredient</th> <th>Ratio Active Ingredient/ Ha</th> <th>Ratio per Kg production</th> </tr> </thead> <tbody> <tr> <td>Kenlon 480EC</td> <td>Trychlopyr butoxy ethyl ester</td> <td>500</td> <td>381</td> <td>182.88</td> <td>0.175</td> <td>0.000</td> </tr> </tbody> </table>	Brand	Active Ingredient	LD50	Total Used	Total Active Ingredient	Ratio Active Ingredient/ Ha	Ratio per Kg production	Kenlon 480EC	Trychlopyr butoxy ethyl ester	500	388	186.24	0.178	0.000	Meta Prima	Methyl metsulfuron	5000	14.7	7.056	0.007	0.000	Gulmaron	diuron	2000	2	0.96	0.000	0.000	Supremo 480SL	Isopropil amina glifosat	5000	2,255	1,082.4	1.033	0.000	Polydor 25 EC	Lamda sihalotrin	2625	5	6	0.068	0.000	Brand	Active Ingredient	LD50	Total Used	Total Active Ingredient	Ratio Active Ingredient/ Ha	Ratio per Kg production	Kenlon 480EC	Trychlopyr butoxy ethyl ester	500	381	182.88	0.175	0.000	<p>Complied</p>
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Meta Prima	Methyl metsulfuron	5000	436,798	209,663.04	200,060	0.001
Gulmaron	diuron	2000	50.4	24.192	0.023	0.004
Supremo 480SL	Isopropil amina glifosat	5000	9,678	4,645.44	4.433	0.005
Polydor 25 EC	Lamda sihalotrin	2625	10	12	0.136	0.000

Scheme smallholders

Examples of verified document as follows:

KUD Sumber Bahagia

Y2023

Brand	Active Ingredient	LD50	Total Used	Total Active Ingredient	Ratio Active Ingredient/ Ha	Ratio per Kg production
Kenlon 480EC	Trychlopyr butoxy ethyl ester	500	17.62	3.52	0.003	0.000
Supremo 480SL	Isopropil amina glifosat	5000	165	79.2	0.076	0.000
Meta Prima	Methyl metsulfuron	5000	18	8.81	0.008	0.000

Y2022

Brand	Active Ingredient	LD50	Total Used	Total Active Ingredient	Ratio Active Ingredient/ Ha	Ratio per Kg production
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		<table border="1"> <tr> <td>Kenlon 480EC</td> <td>Trychlopyr butoxy ethyl ester</td> <td>500</td> <td>37</td> <td>7.40</td> <td>0.007</td> <td>0.000</td> </tr> <tr> <td>Supremo 480SL</td> <td>Isopropil amina glifosat</td> <td>5000</td> <td>440</td> <td>211.2</td> <td>0.202</td> <td>0.000</td> </tr> <tr> <td>Meta Prima</td> <td>Methyl metsulfuron</td> <td>5000</td> <td>44</td> <td>21.12</td> <td>0.020</td> <td>0.000</td> </tr> </table>	Kenlon 480EC	Trychlopyr butoxy ethyl ester	500	37	7.40	0.007	0.000	Supremo 480SL	Isopropil amina glifosat	5000	440	211.2	0.202	0.000	Meta Prima	Methyl metsulfuron	5000	44	21.12	0.020	0.000	
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Meta Prima	Methyl metsulfuron	5000	44	21.12	0.020	0.000																		
<p>7.2.3</p>	<p>(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans. - Critical (Major) compliance -</p>	<p>Until this ASA2_2 audit obtains information that there is no pesticide use for control pest attack. All of pesticide only using for weeding (herbicide). Based on interview with sprayer workers at Ukui Estate, IPM supervisor and smallholder representatives known that no outbreak that causes pesticide usage.</p>	<p>Complied</p>																					
<p>7.2.4</p>	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in Indonesia best practice guidelines. - Minor compliance -</p>	<p>During ASA2_2 obtained information that 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 with Asian Agri's Research and Development guidelines.</p>	<p>Complied</p>																					

<p>7.2.5</p>	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat, are not to be used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks. The due diligence refers to:</p> <p>- Minor compliance -</p> <p>7.2.5a Judgment of the threat and verify why this is a major threat.</p>	<p>Based on goods in and goods out data in pesticide store, obtained information that the certificate holder used some kind of pesticide (different active ingredients). There is only <i>paraquat diklorida</i> that listed as WHO Class II (Moderately Hazardous). As described in this indicator, the company no longer using <i>paraquat diklorida</i> since November 2019.</p> <p>There is no use of other pesticide class 1A and 1B until the audit.</p> <p>Based on the document verification and interview with management, obtain information that there is only pesticide usage for chemical weeding and pest control (if needed). Recommendation of pesticide used are refer to SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i> (Weed control) where explain the weeds type, weeding control methods and eradication, pesticide characteristic, and procedures of application (spraying volume, calibration, chemical weeding interval, target and sprayer maintenance).</p> <p>During the audit, found some pesticide list that usually used with active ingredients such as <i>triklofir, methyl metsulfuron, diuron and glyphosate</i>. Certificate holder no longer using paraquat since 15 November 2019, according to the circular letter of Deputy Managing Director No. 008/DMD/MEMO/OCT/19 dated 22 October 2019.</p> <p>To reduce the human and environmental risk, there is some continuous action Y2022/2023 that has been implemented as follows:</p> <ul style="list-style-type: none"> • Perform routine calibration of spray equipment, which is 2 times a month. • Maintain rotation of spray work, namely 4x per year. • Carried out refresh training related to pesticides application. 	<p>Complied</p>
	<p>7.2.5b Why there is no other alternative which can be used.</p>	<p>According to IPM procedures, certificate holder always using biological approach in order to monitor pest attack. For example, estate using <i>Tyto alba</i> to monitor rat infestation than using rodenticide.</p> <p>To maintain ground condition especially weeding control, certificate holder has had a procedures SOP AA-APM-OP-1100.08-R6 dated 7</p>	

		<p>December 2015: <i>Pengendalian Gulma</i> (Weed Control). This procedure has set the specific pesticide in with minimum risk in accordance with the target.</p>	
	<p>7.2.5c Which process was applied to verify why there is no other less hazardous alternative.</p>	<p>Certificate holder through Asian Agri's Research and Development Department has examined some pesticide in specific target. The result of examination and pesticide recommendation written in the SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i> (Weed Control).</p>	
	<p>7.2.5d Process to limit the negative impacts of the application.</p>	<p>SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i> (Weed Control) has set some procedures to reduce negative impact of the application as follows:</p> <ul style="list-style-type: none"> • Pesticide/herbicide selection to ensuring the application is effective. • Set up the appropriate nozzle in chemical weeding activity based on weed type, topography and availability of water. • Regularly spraying calibration to ensuring the application is effective and efficient. • Calculate pesticide/herbicide usage based on target (hectarage and weed type). • Spraying technic. <p>There is no change about the SOP AA-APM-OP-1100.08-R6 dated 7 December 2015</p>	
	<p>7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</p>	<p>Certificate holder did not use pesticide to eradicated pest without the outbreak. If any census result shows the pest attack almost reach the economical threshold, they usually conducted campaign test using pesticide if needed.</p> <p>Chemical weeding activity has regularly set by management. For example, normally circle, path and collecting point weeding conducted 4 times a year in immature and mature area. Its rotation can be reduced in line with the palm ages.</p>	

<p>7.2.6</p>	<p>(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they conduct.</p> <p>- Critical (Major) compliance -</p>	<p>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.</p> <p>Based on document review and interview with random pesticide applicator known that they attended the last training on pesticide handling in February 2020 and refresh training in October 2022. Some topics that discuss such as safety pesticide handling, national regulation related to pesticide, symbol and label awareness and emergency procedure if any contamination or poisonous. The worker can describe purpose of PPE usage, attending regularly medical check and safety working procedures.</p> <p>Workers that perform herbicide spraying in Ukui Estate also perform spraying activity in smallholder plantation. The spraying team has been trained with pesticide handling training, agrochemical application training and limited pesticide training. The 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.</p> <p>During ASA2_2 audit, auditor team has also interviewed sample of smallholder representatives in KUD Sumber Bahagia, KUD Bina Usaha Baru, KUD Sawit Subur, and KUD Karya Bersama 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.</p>	<p>Complied</p>
<p>7.2.7</p>	<p>(C) Storage of all pesticides in accordance with recognized best practices.</p> <p>- Critical (Major) compliance -</p>	<p>Location the pesticides storage in Ukui Estate.</p> <p>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 showers and</p>	<p>Complied</p>

		<p>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 kits were also provided in the area. Interview with spraying workers demonstrated that all of them have a good knowledge regarding pesticide usage and its material usage and toxicity. PPE for handling of chemicals were provided including boots, apron, safety glass, respiratory mask and hand gloves. PPE used was appropriate according to recommendations in any risk assessments. PPE provided and used can be easily replaced if damaged. All precautions attached to the products properly observed, applied, and understood by workers.</p> <p>Based on a field visit during ASA2_2 to the Pesticides Storage, there was found that:</p> <ul style="list-style-type: none"> - Permanent Buildings, - A good ventilation, - Permanent floor is cemented, the floor of the mixing of pesticides using ceramics, and equipped with a "spillage trap", - Eye wash shower, first aid box, PPE and Fire extinguisher are provided. - PPE room. - Operation control: MSDS are available for all types of existing pesticides and he pesticide management and safety instructions are available. - A package management/ used pesticide package is available. - Water wash of pesticides containers collected in "spillage trap". - The flow of wastewater is channeled and stored so that it is not discharged into the environment. The water used is used for its dilution. <p>All waste products have been identified and documented under the "Evaluasi Aspek-Dampak Lingkungan" (Environmental Aspect impacts).</p>	
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		<p>Domestic waste is the main concern to be manage. Both Mill and Estate, has periodically schedule to manage the domestic waste.</p> <p>Scheme smallholders</p> <p>For the scheme smallholders, the pesticides were delivered to the Ukui Estate’s pesticides storage. The pesticide storage has been verified during ASA2_2.</p>	
<p>7.2.8</p>	<p>All pesticide containers that are disposed of and/or used for other purposes are managed according to applicable regulations and/or instructions on the packaging.</p> <p>- Minor compliance -</p>	<p>All pesticides container is sent to the registered collector/transporter which approved by Environmental Ministry, namely PT Hazmat Techno Indonesia as mentioned in the indicator 7.3.2 below.</p> <p>The verified manifest document are as follows:</p> <p>Transported on 18 November 2022</p> <ul style="list-style-type: none"> • Manifest Festronik No. KLHK-1674093124 – used rags; hazardous waste code: B110d. • Manifest Festronik No. KLHK-1673989424 – used chemical containers; hazardous waste code: B104d. • Manifest Festronik No. KLHK-1674002750 – used oil; hazardous waste code: B105d. • Manifest Festronik No. KLHK-1673987134 – electronic waste; hazardous waste code: B107d. • Manifest Festronik No. KLHK-1675785901 – medical waste; hazardous waste code: A337-1. • Manifest Festronik No. KLHK-1673986207 – used battery; hazardous waste code: A102d. • Festronik Nomor KLHK-1673985685 – used filter; hazardous waste code: B109d. <p><u>Scheme smallholders:</u></p>	<p>Complied</p>

		<p>Group manager has a policy and mechanism to manage the waste from fertilizer sack according to procedure of "Prosedur Pemusnahan Wadah Bekas Bahan Kimia dan Diagram Alur Pembuangan Wadah Bekas Agrokimia". The fertilizer sack must be handled by triple rinse and use as loose fruit sack, the inner bag of fertilizer was delivered to collector.</p> <p>During field observation and interview with sample of smallholders at KUD Bina Usaha Baru, KUD Sawit Subur, KUD Karya Bersama and KUD Sumber Bahagia, they were well aware of the to manage the waste from ex fertilizer sack and empty chemical.</p>	
7.2.9	<p>(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.</p> <p>- Critical (Major) compliance -</p>	<p>Estate: All chemicals and empty containers collected and stored at permitted hazardous waste storage (<i>Tempat Penyimpanan Sementara Limbah B3</i>) as per Indonesia regulation, location in Ukui Estate.</p> <p>Scheme smallholders: 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.</p> <p>During field visit and interview with sample smallholder in KUD Sumber Bahagia, KUD Bina Usaha Baru, KUD Sawit Subur, and KUD Karya Bersama, they were well aware of the to manage the waste from ex fertilizer sack and empty chemical.</p>	Complied
7.2.10	<p>(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p> <p>- Critical (Major) compliance -</p>	<p>PT Inti Indosawit Subur – Ukui Group has conducted the special annual medical surveillance for pesticides operators.</p> <p>Scheme smallholder's: Special medical check-up for smallholder's pesticide operator is include with Estate, because those chemical/spraying operators are work at Estate and Smallholders area.</p>	Complied

		<p>Cooperative sample → KUD Bina Usaha Baru, KUD Sawit Subur, KUD Karya Bersama, KUD Usaha</p> <p>Report of MCU was conducted on 7-8 March 2023 Focus Clinical Laboratory – Pekanbaru. Data seen: MCU for 21 workers handling with chemical, such as pesticide, herbicide, and fertilizer applicator and for PIC in pesticides storage. herbicide, and fertilizer applicator and for PIC in pesticides storage.</p> <p>Special Medical Check-Up was covered to cholinesterase test, spirometry, and visual test. The result of MCU has communicated to all related workers on 16 April 2023.</p>	
7.2.11	<p>(C) No pesticide-related work is carried out by pregnant or breastfeeding women, or people with medical limitations and they are offered other equivalent work alternatives.</p> <p>- Critical (Major) compliance -</p>	<p>Based on “Daftar Karyawan TUS Kebun Ukui” there are 30 workers/sprayers in Kebun Ukui where 26 of them are women workers/sprayers. The company has prohibited pregnant or breast-feeding women to perform chemical spraying. In order to mitigate, estate performed monthly pregnancy test.</p> <p>The organization has kept the record that spraying is not conducted by pregnant or breast-feeding women. The company has been conducting PP Test (pregnant test) every month.</p> <p>The last of pregnancy test conducted in April 2023. All the female sprayer in well condition and not being pregnant nor breast feeding.</p> <p>Based on interview with clinic staff (nurse), the pregnant test was conducted in order to ensure there are no pregnant workers in spraying activities.</p>	Complied

Note For 7.2.11

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

Criteria 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.

<p>7.3.1</p>	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented in accordance with applicable laws and regulations.</p> <p>- Minor compliance -</p>	<p>PT Inti Indosawit Subur – Ukui Group has a procedure to handle hazardous waste titled “Prosedur Penanganan Limbah B3” No.AA-KL-06-EFP explains methods to collecting the waste, recording in balance and disposal through licensed third party transporter.</p> <p>PT Inti Indosawit Subur – Ukui Group has stored the hazardous waste in temporary storage with permit. The temporary hazardous waste storage has a valid permit based on “Surat Keputusan Badan Penanaman Modal dan Pelayanan Perijinan Terpadu nomor: KPTS-503/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 is approved by the Environmental Ministry.</p> <p>A documented waste management plan to avoid or reduce pollution and its implementation available under document of Environmental Aspect-Impacts (<i>Evaluasi Aspek-Dampak Lingkungan</i>) updated on 2023. The document covered all operation in mill, estate and its smallholders.</p> <p>Scheme Smallholder</p> <p>All operational activities including spraying was conducted by TUS Team from Ukui I Estate so no hazardous waste management in scheme smallholder.</p>	<p>Complied</p>
<p>7.3.2</p>	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p> <p>- Minor compliance -</p>	<p>The hazardous waste is sent to the registered collector/transporter which is approved by the Environmental Ministry. Document of agreements and third parties’ licenses:</p> <ul style="list-style-type: none"> • SPK for Transport and Management of LB3 between PT Inti Indosawit Subur and PT Hazmat Techno Indonesia and PT Pengolahan Limbah Industri Bekasi No. 06/SPJ/LEG-IIS/I/23 dated 2 January 2023. The agreement period starts from 1 January 2023 – 31 December 2024. • 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, 	<p>Complied</p>

		<p>2018, is valid for 5 years and the Approval Letter from the Investment Service and One Stop Integrated Licensing Service Number 660/1798.</p> <ul style="list-style-type: none"> • SPK for Transport and Management of LB3 between PT Inti Indosawit Subur and PT Hazmat Techno Indonesia and PT Putra Restu Ibu Abadi No. 08/SPJ/LEG-IIS/I/23 dated 2 January 2023. The agreement period starts from 1 January 2023 – 31 December 2024. • 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. • 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. • SPK for Transport and Management of LB3 between PT Inti Indosawit Subur with PT Hazmat Techno Indonesia and PT Trigunapratama Abadi No. 09/SPJ/LEG-IIS/I/23 dated 2 January 2023. The agreement period starts from 1 January 2023 – 31 December 2024 • PT Trigunapratama Abadi – B3 waste management services based on the Decree of the Minister of LHK RI No S.1097/Menlhk/Setjen/PLB.3/12/2019 dated 23 December 2019. <p>The verified manifest document are as follows: Transported on 18 November 2022</p> <ul style="list-style-type: none"> • Manifest Festronik No. KLHK-1674093124 – used rags; hazardous waste code: B110d. • Manifest Festronik No. KLHK-1673989424 – used chemical containers; hazardous waste code: B104d. • Manifest Festronik No. KLHK-1674002750 – used oil; hazardous waste code: B105d. 	
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7.3.3	<p>The unit of certification does not use open fire for waste disposal.</p> <p>- Minor compliance -</p>	<p>There is no change of compliance statement compared to last year’s audit. 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 managed. Both Mill and Estate, has periodically schedule to manage the domestic waste. The document of “Jadwal Pengangkutan Sampah 2022 untuk Karyawan Ukui Estate”. Regulation of domestic waste management refer to “UU No. 18 Tahun 2008 tentang Pengelolaan Sampah”.</p> <p>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 fertilizer bags were prohibited to dispose in plantation and housing area. All the fertilizer bags usage must be identified and reported to Group Manager.</p> <p>Based on field observation in Ukui Estate and sampled smallholder at KUD Bina Usaha Baru, KUD Sawit Subur, KUD Karya Bersama and KUD Sumber Bahagia, it was found no use of open fire for waste disposal.</p>	Complied

Criteria 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	<p>Good agricultural practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts is documented.</p> <p>- Minor compliance -</p>	<p>Ukui Estate:</p> <p>Estate and smallholder have the procedure related to manage soil fertility (see detail in indicator 3.3.1). The implementation of manuring is based on fertilizer recommendation that set by Asian Agri’s Research and Development Department. Fertilizer dosage has set according to the soil needed refer to SSU/LSU.</p> <p>The management unit has applied fertilizer according to the fertilizer’s recommendation issued by Asian Agri Research and Development Department. Based on field visit in Block D16c Afdeling 4 Ukui Estate using MOP with dosage 1.75 gr/palm (this is in accordance with fertilizer’s recommendation 2022).</p> <p>In addition, management unit also applied POME application especially in early mature area to maintain soil fertility and increase production. The POME applied with dosage 800 m3/Ha/year.</p> <p>Scheme Smallholder:</p> <p>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.</p> <p>Based on interview with smallholders during ASA2_2, most of their plots is no longer applied with fertilizer due to in replanting preparation in 2023.</p>	Complied
7.4.2	<p>Analysis of tissue samples (e.g. leaves) and soil on a regular basis to monitor and manage changes in soil fertility and plant health is documented.</p> <p>- Minor compliance -</p>	<p>According to the Asian Agri’s agricultural policy, soil sampling conducted every 5 years while leaf sampling conducted annually. Based on document verification during ASA2_2 sighted the report of soil and leaf sampling in own estate and smallholders as follows:</p> <ul style="list-style-type: none"> The last soil sampling conducted in April 2022. Parameter that tested is N, C, P, K, Ca, Mg particle size and pH. 	Complied

		<ul style="list-style-type: none"> The last leaf sampling conducted on 16 April 2022. Parameter that tested is major element (Ash, N, P, K Mg, Ca) dan Minor element (B, Cu, Zn, Mn, Fe). Result of leaf sampling analysis are stated in Leaf Analysis Result Lab. <p>Those reports are converted to be fertilizer recommendation by Asian Agri's Research and Development Department.</p>										
<p>7.4.3</p>	<p>A nutrient recycling strategy is in place, which include the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.</p> <p>- Minor compliance -</p>	<p>Ukui Estate:</p> <p>There was nutrient recycling strategy performed by PT. IIS Ukui Group such as land application from POME (Palm Oil Mill Effluent) and Empty fruit bunch (EFB) application. POME or liquid waste from mill used as Land application, it gives nutrient for palm oil plantation.</p> <p>PT IIS Ukui I POM has a permit of Land Application as per "Keputusan Kepala Dinas Penanaman Modal dan Pelayanan terpadu Satu Pintu Kabupaten Pelalawan "Izin Pemanfaatan Air Limbah Industri Minyak Sawit ke Tanah Perkebunan Kelapa Sawit (Land Application) atas nama PT IIS Ukui.</p> <p>EFB were applied based on the recommendation from R&D in terms of dosage per ha and location. EFB were applied in Ketapang Agro Lestari Estate by manually. EFB were not applied nearby housing and water spring. Empty fruit bunch application was performed as mulch ground cover and added of organic material. Records of EFB application in Ukui Estate are available.</p> <p>EFB and POME application in 2022 and 2023 (until April):</p> <p>2022</p> <table border="1" data-bbox="1093 1217 1749 1364"> <thead> <tr> <th>Month</th> <th>POME application (m³)</th> <th>EFB (MT)</th> </tr> </thead> <tbody> <tr> <td>January</td> <td>22,164</td> <td>1,526</td> </tr> <tr> <td>February</td> <td>19,370</td> <td>2,474</td> </tr> </tbody> </table>	Month	POME application (m ³)	EFB (MT)	January	22,164	1,526	February	19,370	2,474	<p>Complied</p>
Month	POME application (m ³)	EFB (MT)										
January	22,164	1,526										
February	19,370	2,474										

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March	21,824	1,608
April	21,057	3,434
May	20,022	2,319
June	22,086	653
July	23,170	505
August	19,704	3,356
September	20,703	382
October	20,382	321
November	10,727	361
December	19,023	3,783
Total	240,232	20,722

2023

Month	POME application (m ³)	EFB (MT)
January	16,478	2,170
February	13,783	2,046
March	15,270	824
April	12,011	415
May	19,651	4,489
Total	77,193	9,944

Field verification for wastewater application was carried out in block C89d Afd III Ukui Estate, interview also was carried out to the LA workers and

		<p>supervisor, it was found that the application was in accordance with the SOP.</p> <p>Scheme Smallholder: During ASA2_2, according to the interview with smallholder representatives and field visit to the KUD Sumber Bahagia, KUD Bina Usaha Baru, KUD Sawit Subur, and KUD Karya Bersama, there is no longer EFB application at this time since their area include in replanting plan in 2023.</p>																																					
<p>7.4.4</p>	<p>Records of fertilizer inputs are maintained. - Minor compliance -</p>	<p>The result of leaf sampling analysis, soil sampling analysis along with visual analysis, planting material, planting age and rain fall are considered in proposing the Fertilizer Recommendation. The follow is the Fertilizer Recommendation for Ukui Estate.</p> <p>Fertilizer Recommendation and realization for year 2022:</p> <table border="1" data-bbox="1093 826 1928 1209"> <thead> <tr> <th>Fertilizer</th> <th>Recommendation (Kg)</th> <th>Realization (Kg)</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>Urea</td> <td>663,816</td> <td>663,816</td> <td>100</td> </tr> <tr> <td>AC</td> <td>207,807</td> <td>207,807</td> <td>100</td> </tr> <tr> <td>RP</td> <td>705,123</td> <td>705,123</td> <td>100</td> </tr> <tr> <td>MOP</td> <td>1,200,733</td> <td>1,200,733</td> <td>100</td> </tr> <tr> <td>Dolomit</td> <td>774,369</td> <td>774,369</td> <td>100</td> </tr> <tr> <td>HGFB</td> <td>39,374</td> <td>39,374</td> <td>100</td> </tr> </tbody> </table> <p>Fertilizer Recommendation and realization for year 2023 (until April):</p> <table border="1" data-bbox="1093 1299 1928 1378"> <thead> <tr> <th>Fertilizer</th> <th>Recommendation (Kg)</th> <th>Realization (Kg)</th> <th>%</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Fertilizer	Recommendation (Kg)	Realization (Kg)	%	Urea	663,816	663,816	100	AC	207,807	207,807	100	RP	705,123	705,123	100	MOP	1,200,733	1,200,733	100	Dolomit	774,369	774,369	100	HGFB	39,374	39,374	100	Fertilizer	Recommendation (Kg)	Realization (Kg)	%					<p>Complied</p>
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Fertilizer	Recommendation (Kg)	Realization (Kg)	%																																				

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		Urea	445,956	445,956	100
		ZA	772,993	-	-
		RP	622,884	-	-
		MOP	1,108,253	482,725	44
		Dolomite	721,733	462,259	64
		HGFB	36,722	-	-
		Scheme smallholder:			
		Y2022			
		Fertilizer	Recommendation (Kg)	Realization (Kg)	%
		AC	176,638	176,638	100
		Urea	370,926	370,926	100
		MOP	611,609	611,609	100
		TSP	28,237	28,237	100
		Rp	162,191	162,191	100
		Dolomite	416,672	416,672	100
		HGFB	28,654	28,654	100
		Y2023			
		Fertilizer	Recommendation (Kg)	Realization (Kg)	%

		AC	63,000	63,000	100	
		Urea	254,805	254,805	100	
		MOP	188,573	188,573	100	
		RP	260,124	260,124	100	
		Dolomite	193,251	193,251	100	
		HGFB	6,323	6,323	100	

Criteria 7.5: Practices minimise and control erosion and degradation of soils.

<p>7.5.1</p>	<p>(C) Maps that identify marginal and fragile soils, including steep sloped land are available. - Critical (Major) compliance -</p>	<p>Ukui Estate: During audit ASA 2.2 there is no change on soil survey semi detail in Estate. Asian Agri’s Research and Development Department has conducted soil survey semi detail in PT Inti Indosawit Subur (Estate) in 2010. Based on the report found the soil taxonomy refer to USDA 2006 as follows:</p> <ul style="list-style-type: none"> • 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) <p>Topography:</p> <ul style="list-style-type: none"> • Flat – undulating (0 – 8%) → 15.15% from the total area • Rolling (8 – 15%) → 36.29% from the total area • Rolling - Hilly (15 – 30%) → 45.68% from the total area • Steep (>30%) → 2.88% from the total area <p>Based on field visit in Ukui Estate, sighted ground management in steep area as follows:</p> <ul style="list-style-type: none"> • Terracing in contour area. 	<p>Complied</p>
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		<ul style="list-style-type: none"> • Land cover crop in replanting area and immature oil palm. • Frond stacking alongside the contour. • No chemical in <i>Neprolephis bisserata</i>. Chemical application selective only for circle and path. • EFB application for soil mulching. <p>Scheme Smallholder:</p> <p>During audit ASA 2.2 there is no changing on soil survey semi detail in Plasma Plantation/Scheme Smallholder. Asian Agri's Research and Development Department has conducted soil survey semi detail in Smallholder Area (Plasma Estate) of PT Inti Indosawit Subur in 2010. Based on the report found the soil taxonomy refer to USDA 2006 as follows:</p> <ul style="list-style-type: none"> • Typic Dystrudepts (49.26% from the total area) • Typic Endoaquepts (46.71 % from the total area) • Typic Haplosaprist (4.03% from the total area) <p>Soil topography:</p> <ul style="list-style-type: none"> • Flat – undulating (0 – 8%) → 58.83% from the total area • Rolling (8 – 15%) → 7.06% from the total area • Rolling - Hilly (15 – 30%) → 34.11% from the total area <p>These maps are available in each unit.</p> <p>Based on field visit in Ukui Plasma, sighted ground management in steep area as follows:</p> <ul style="list-style-type: none"> • Terracing in contour area. • Land cover crop in replanting area and immature oil palm. • Frond stacking alongside the contour. 	
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		No chemical in <i>Neprolephis bisserata</i> . Chemical application selective only for circle and path.	
7.5.2	The replanting of palm oil is not conducted extensively on steep terrain in accordance with applicable regulations. - Minor compliance -	Based and document verification and field observation, there is no extensive replanting activity in steep terrain both own estate and scheme smallholder area.	Complied
7.5.3	New palm oil planting is not conducted on steep terrain in accordance with applicable regulations. - Minor compliance -	There is no new palm oil planting in Ukui Estate and Scheme Smallholder.	Complied
Criteria 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.			
7.6.1	(C) Evidence of long-term land suitability for oil palm cultivation, soil maps or soil surveys that identify marginal and fragile soils, including steep terrain are available, in planning and operations. - Critical (Major) compliance -	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 ASA2_2 audit, auditor has been confirmed that there is no new planting (land extension) of PT Inti Indosawit Subur Ukui Group or plasma area. It is only replanting activity that conducted in 2017.	Complied
7.6.2	Extensive planting on marginal and fragile soils is avoided or, if necessary, carried out according to the best-practice soil management plan. - Minor compliance -	During this ASA2_2 audit, auditor has confirmed that there is no new planting (land extension) of PT Inti Indosawit Subur Ukui Group or plasma area. It is only replanting activity that conducted in 2017. Replanting activity in steep area using a terrace contour for soil conservation.	Not Applicable
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	During this ASA2_2 audit, auditor has been confirmed that there is no new planting (land extension) of PT Inti Indosawit Subur Ukui Group or plasma area. It is only replanting activity that conducted in 2017. Replanting activity in steep area using a terrace contour for soil conservation.	Not Applicable
Criteria 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			

7.7.1	<p>(C) No new planting on peatlands, regardless of depth, after 15 November 2018, in existing plantation areas, as well as in new development areas.</p> <p>- Critical (Major) compliance -</p>	<p>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 Ukui Estate and Ukui Plasma/Scheme Smallholder. There are 4 types of soil in Soga & Sei Lala Estate and Plasma Ukui area, namely:</p> <ol style="list-style-type: none"> 1. Typic Dystrudepts 2. Typic Endoaquepts 3. Typic Haplosaprists 4. Typic Placaquods <p>In addition, there is no new planting after November 2018. Therefore, this indicator is not applicable.</p>	Not Applicable
7.7.2	<p>Peat areas within the managed area are inventoried, documented and reported to the RSPO Secretariat (effective from November 15, 2018).</p> <p>- Minor compliance -</p>	<p>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.</p> <p>In addition, there is no new planting after November 2018. Therefore, this indicator is not applicable.</p>	Not Applicable
<p>PROCEDURAL NOTE: Maps and other documentation for peatlands are provided, prepared and shared according to the RSPO Working Group (Peatland Working Group / PLWG) audit guide (See Procedural Notes for Indicator 7.7.5 below).</p>			
7.7.3	<p>(C) Subsidence of peat is monitored, documented and minimised.</p> <p>- Critical (Major) compliance -</p>	<p>There is no change of compliance statement compared to last year's audit. 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 Ukui Estate and Ukui Plasma. Therefore, this indicator is not applicable.</p>	Not Applicable
7.7.4	<p>(C) Availability of implementation evidence of the water and land cover management program.</p> <p>- Critical (Major) compliance -</p>	<p>There is no change of compliance statement compared to last year's audit. 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 Ukui Estate and Ukui Plasma. Therefore, this indicator is not applicable.</p>	Not Applicable

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7.7.5	<p>(C) Drainability assessments are conducted for plantations planted on peat following the RSPO Drainability Assessment Procedure, or other method recognized by RSPO, (at least five years or in accordance with the provisions of the RSPO Drainability Assessment Procedure) before replanting. The results of the assessment are used to determine the period of replanting to be carried out, as well as to gradually replace oil palm cultivation for at least 40 years or two cycles, (whichever is longer), before reaching the natural gravitational drainage limit for peat. If oil palm is gradually replaced, it is replaced by other commodity crops that are better suited for higher groundwater levels (paludiculture) or rehabilitated with natural vegetation.</p> <p>- Critical (Major) compliance -</p>	<p>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 Ukui Estate and Ukui Plasma. Therefore, this indicator is not applicable.</p>	Not Applicable
<p>PROCEDURAL NOTE: For 7.7.5: Detailed information on the RSPO Drainability Assessment Guide along with related concepts and detailed actions is contained in the Guidelines currently being adjusted / tested by the RSPO Working Group on Peatlands (Peatland Working Group / PLWG). The final version must obtain PLWG approval in January 2019 and will include additional Guide on the steps to be followed after deciding not to replant and the consequences for other stakeholders, farmers, local communities, and the unit of certification concerned. It is recommended that the trial methodology period is proposed to be extended for 12 months for all relevant management units (ie management units that have plantations on peat) to utilize the methodology and provide input to PLWG so that existing procedures can be further refined as needed before January 2020. The unit of certification has the option to delay replanting until the issuance of the revised Guidelines for the guidelines. Additional guidance for alternative commodity crops and rehabilitation of natural vegetation will be regulated by the PLWG.</p>			
7.7.6	<p>(C) All existing plantations on peat are managed according to applicable laws and/or "RSPO Guidelines for Best Management Practices (BMP) for Oil Palm Cultivation that are already on Peatlands", version 3 (June 2019) along with related audit guidelines (May 2019).</p> <p>- Critical (Major) compliance -</p>	<p>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 Ukui Estate and Ukui Plasma. Therefore, this indicator is not applicable.</p>	Not Applicable
7.7.7	<p>(C) All peat areas not planted and reserved in managed areas (regardless of depth) are protected as 'peatland conservation areas'; unit of certification are prohibited from constructing drainage channels, building roads and new electricity lines on peatlands; unless if it is for a non- corporate land clearance. Peatlands are managed in accordance with 'RSPO Best Management Practices for the</p>	<p>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 Ukui Estate and Ukui Plasma. Therefore, this indicator is not applicable.</p>	Not Applicable

	<p>Management and Rehabilitation of Natural Vegetation related to Oil Palm Cultivation that already exists in Peatlands' (the latest version) along with relevant audit guidelines.</p> <p>- Critical (Major) compliance -</p>		
Criteria 7.8: Practices maintain the quality and availability of surface and groundwater.			
7.8.1	<p>A water management plan is available and is implemented to support efficient use of water sources and continuous availability and avoid negative impacts on other users in the catchment. The plan referred to contains the following matters:</p> <p>- Minor compliance -</p> <p>7.8.1a The unit of certification does not limit access to clean water or does not pollute the water used by the community.</p>	<p>There are no changes regarding water management plan because it was stated in document "Rencana Pengelolaan Lingkungan" and "Rencana Pemantauan Lingkungan" PT Inti Indosawit Subur – Ukui Group.</p> <p>"Program Manajemen Lingkungan 2022" consisting 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).</p> <p>PT Inti Indosawit Subur Ukui Group has also prepared the procedure on protection of water courses under "SOP Pengendalian Riparian" number AA-APM-OP-1100.21-R2, dated 25th February 2016.</p> <p>All of KUD has programs on water management as in "<i>Rencana dan Realisasi Penyusunan Pelapah Letter "U", frond stacking. "Rencana dan Realisasi Perawatan Teresan sebagai Sarana Konservasi Tanah dan Air serta Upaya Pencegahan Erosi"</i></p> <p>PT Inti Indosawit Subur – Ukui Group has established a management plan to protect water courses and wetlands, including securing and maintaining appropriate riparian.</p> <ul style="list-style-type: none"> - Riparian restoration with forest vegetation plant/tree. - Establish zone for zero chemical. No spraying and fertilizing along riparian zone. - Conserve natural vegetation in riparian zone - Restricted to conduct replanting palm oil in riparian area. 	Complied

		<p>PT Inti Indosawit Subur – Ukui I POM has also prepared the procedure on protection of water courses under “SOP Pengendalian Riaprian” number AA-APM-OP-1100.21-R2, dated 25th February 2016.</p> <p>Ukui I POM also paid the water retribution each month to “<i>UPT Pengelolaan Pendapatan, Badan Pendapatan daerah Pemerintah Provinsi Riau</i>”. Sample: SPPD (<i>Surat Setoran Pajak Daerah</i>) untuk Pajak Pengambilan dan Pemanfaatan Air Permukaan untuk period January – March 2023.</p>																																				
<p>7.8.1b Workers have adequate access to clean water.</p>		<p>PT Inti Indosawit Subur - Ukui I POM has prepared the plan of water management plan as in “Program Manajemen Lingkungan 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.</p> <p>The result of monitoring or testing the clean water / water consumption conducted by “Unit Pelaksana Teknisi Laboratorium Bahan Konstruksi”, Pekanbaru. Certificate of Analysis for Clean Water (by cooking treatment) No. D.12.2718/LHU/2022 dated 18 November 2022, location in Ukui I POM shown comply to PERMENKES No. 492/MENKES/PER/IV/2010, such as:</p> <table border="1" data-bbox="1093 1007 1951 1329"> <thead> <tr> <th>No</th> <th>Parameter</th> <th>Quality Std</th> <th>Unit</th> <th>Result</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Total Coliform</td> <td>0</td> <td>Amount/100 mL</td> <td>0</td> </tr> <tr> <td>2</td> <td>E. Coli</td> <td>0</td> <td>Amount/100 mL</td> <td>0</td> </tr> <tr> <td>3</td> <td>Zn</td> <td>0.3</td> <td>mg/L</td> <td><0.06</td> </tr> <tr> <td>4</td> <td>pH</td> <td>6.5-8.5</td> <td>-</td> <td>7.2</td> </tr> <tr> <td>5</td> <td>Colour</td> <td>TCU</td> <td>15</td> <td>0.25</td> </tr> <tr> <td>6</td> <td>TDS</td> <td>mg/L</td> <td>500</td> <td>34</td> </tr> </tbody> </table>	No	Parameter	Quality Std	Unit	Result	1	Total Coliform	0	Amount/100 mL	0	2	E. Coli	0	Amount/100 mL	0	3	Zn	0.3	mg/L	<0.06	4	pH	6.5-8.5	-	7.2	5	Colour	TCU	15	0.25	6	TDS	mg/L	500	34	
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<p>7.8.2</p>	<p>(C) Water courses and wetlands are protected, including the maintenance and restoration of riparian zones and other buffer zones during or before replanting, in accordance with the "RSPO Manual on BMPs for the management and rehabilitation of riparian reserves" (April 2017) or Simplified Guide Management and Rehabilitation of Riparian Reserves (2018). - Critical (Major) compliance -</p>	<p>PT Inti Indosawit Subur – Ukui I POM has established a management plan to protect water courses and wetlands, including securing and maintaining appropriate riparian.</p> <ul style="list-style-type: none"> - Riparian restoration with forest vegetation plant/tree. - Establish zone for zero chemical. No spraying and fertilizing along riparian zone. - Conserve natural vegetation in riparian zone. - Restricted to conduct replanting palm oil in riparian area. <p>There is no change of management plan compared to last year audit.</p>	<p>Complied</p>
<p>7.8.3</p>	<p>Mill effluent is managed according to applicable regulations. The quality of mill effluent discharged, especially BOD (Biochemical Oxygen Demand) is monitored in accordance with applicable regulations. - Minor compliance -</p>	<p>There are no changes in effluent treatment.</p> <p>Ukui I POM, there are 11 ponds in effluent treatment system (WWTP), which consists of Colling Pond, Primary Anaerobic Pond, Secondary Anaerobic Pond, Acidification Pond, and Buffering pond. Procedure of WWTP operation available in Mill Policy Manual (MPM) dated February 1, 2013, chapter AA-MPM-OP-1400.13-R1.</p> <p>Ukui I POM has been installed at a Biogas power plant since April 2015 to generate electrical power methane. The biogas system has Anaerobic MBR system thorough digester Thermophilic fermentation, and anaerobic membrane tank.</p> <p>According to effluent monitoring data, all mill effluents are used for land application. Mill holds permit to discharge wastewater into land application from local authority.</p> <p>As required by LA permit, Mill conducts monthly check on discharged effluent in cooperation with accredited Laboratory (UPT Pengujian Material, Dinas Bina Marga Provinsi Riau). According to recent testing result, BOD level of applied effluent has met the applicable threshold of KepmenLH No.28/2003 regarding BOD limits of effluent discharge for land application. The level is maintained consistently less than 5,000 mg/L and debit <600 m3 per day.</p>	<p>Complied</p>

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Based on result of monitoring January – December 2022 and also January – April 2023 shown comply with legal requirement "PermenLHK No P.68/Setjen/Kum1/8/2016".

Analysis period January – December 2022

Parameter	Satuan	Baku Mutu	Jan	Feb	Mar	Apr	Mei	Jun
pH	-	6--9	8.4	8.36	8.36	8.36	8.36	8.36
BOD (KOB)	mg/l	<5000	3200	3400	3600	3600	3600	3400
COD (KOK)	mg/l	-	5500	5800	6200	5900	5900	6100
Minyak dan Lemak	mg/l	-	220	240	380	320	310	350
Kadmium (Cd)	mg/l	-	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
Tembaga (Cu)	mg/l	-	0.65	0.67	0.89	0.89	0.78	0.77
Timbal (Pb)	mg/l	-	0.019	0.022	0.034	0.024	0.028	0.029
Seng (Zn)	mg/l	-	0.61	0.64	0.82	0.91	0.72	0.71

Parameter	Satuan	Baku Mutu	Jul	Agt	Sep	Okt	Nov	Des
pH	-	6--9	8.1	8.4	7.3	7.9	7.35	7.7
BOD (KOB)	mg/l	<5000	4200	4600	2143	1973	2431	2071
COD (KOK)	mg/l	-	6200	6400	5789	3125	7145	5983
Minyak dan Lemak	mg/l	-	42	52	18.3	16.48	19.25	15.62
Kadmium (Cd)	mg/l	-	<0.001	<0.001	<0.016	<0.016	<0.016	<0.016
Tembaga (Cu)	mg/l	-	0.88	0.96	<0.016	<0.016	<0.016	<0.016
Timbal (Pb)	mg/l	-	0.036	0.042	<0.08	<0.08	<0.08	<0.08
Seng (Zn)	mg/l	-	0.92	0.91	<0.016	<0.016	<0.016	<0.016

Analysis period January – April 2023

Parameter	Satuan	Baku Mutu	Jan	Feb	Mar	Apr
pH	-	6--9	7.60	6.10	7.20	7.50
BOD (KOB)	mg/l	<5000	2,412.09	2,580.39	2,496.15	2,375.19
COD (KOK)	mg/l	-	5,710.11	5,046.11	4,711.95	4,023.65
Minyak dan Lemak	mg/l	-	20.42	24.12	15.60	18.61
Kadmium (Cd)	mg/l	-	<0.016	<0.016	<0.016	<0.016
Tembaga (Cu)	mg/l	-	<0.016	<0.016	<0.016	<0.016
Timbal (Pb)	mg/l	-	<0.080	<0.080	<0.080	<0.080
Seng (Zn)	mg/l	-	<0.016	<0.016	<0.016	<0.016

<p>7.8.4</p>	<p>Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -</p>	<p>Ukui I 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 2022, updated in December 2022.</p> <table border="1" data-bbox="1093 464 1532 901"> <thead> <tr> <th>Month</th> <th>Water use (M³)</th> </tr> </thead> <tbody> <tr><td>January</td><td>17,991</td></tr> <tr><td>February</td><td>18,148</td></tr> <tr><td>March</td><td>23,715</td></tr> <tr><td>April</td><td>24,507</td></tr> <tr><td>May</td><td>25,018</td></tr> <tr><td>June</td><td>29,557</td></tr> <tr><td>July</td><td>26,618</td></tr> <tr><td>August</td><td>29,029</td></tr> <tr><td>September</td><td>29,662</td></tr> <tr><td>October</td><td>27,817</td></tr> <tr><td>November</td><td>28,520</td></tr> <tr><td>December</td><td>37,269</td></tr> </tbody> </table> <p>For data January – April can be seen in "Mill Operation Summary" updated April 2023</p> <table border="1" data-bbox="1093 1023 1532 1193"> <thead> <tr> <th>Month</th> <th>Water use (M³)</th> </tr> </thead> <tbody> <tr><td>January</td><td>29,822</td></tr> <tr><td>February</td><td>17,099</td></tr> <tr><td>March</td><td>19,717</td></tr> <tr><td>April</td><td>26,237</td></tr> </tbody> </table>	Month	Water use (M ³)	January	17,991	February	18,148	March	23,715	April	24,507	May	25,018	June	29,557	July	26,618	August	29,029	September	29,662	October	27,817	November	28,520	December	37,269	Month	Water use (M ³)	January	29,822	February	17,099	March	19,717	April	26,237	<p>Complied</p>
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<p>Criteria 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised</p>																																							
<p>7.9.1</p>	<p>Plans to increase the efficiency of fossil fuel use and to optimize renewable energy are available, monitored and documented. - Minor compliance -</p>	<p>Fossil fuel records were 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</p>	<p>Complied</p>																																				

		fuel. Fossil fuel usage is recorded for operational purposes, including the efficiency analysis.	
<p>Criteria 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.</p>			
7.10.1	<p>(C) GHG emissions for the unit of certification are identified and assessed. Plans to reduce or minimize GHG emissions are implemented, monitored through the PalmGHG calculator, and reported publicly.</p> <p>- Critical (Major) compliance -</p>	<p>There are no changes regarding GHG identification and reduction plan.</p> <p>PT Inti Indosawit Subur – Ukui I POM has identified the emission sources and pollution under document of "Environmental Aspect-Impacts (<i>Evaluasi Aspek-Dampak Lingkungan</i>) year 2023".</p> <p>Identification of greenhouse gas (GHG) emissions sources both of Mill, Estate and Smallholders consist of emission from boiler and generator, effluent from mill wastewater, particulate from boiler stack, noise, fertilizer application, fossil fuels usage, transport of FFB.</p> <p>The assessment of pollution activities was documented in "Mitigasi Gas Rumah Kaca". All the activities of mill and estate as well as the waste generated has been well documented, for examples the operational activity from generator is generates air emissions, the company conducts periodic generator maintenance and perform quality measurement of exhaust emissions each semester to ensure air quality is comply with standard regulation.</p>	Complied
7.10.2	<p>(C) Since 2014, an estimate of carbon stocks in the proposed development area has been carried out along with potential sources of emissions that can occur directly as a result of the development and plans to minimize these emissions are prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <p>- Critical (Major) compliance -</p>	<p>There is no new planting within certified area of PT Inti Indosawit Subur – Ukui 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.</p>	Complied
7.10.3	<p>(C) Other significant pollutant identification results are available and plans to reduce or minimize them are implemented and monitored.</p> <p>- Critical (Major) compliance -</p>	<p>PT Inti Indosawti Subur – Ukui I POM has identified the significant pollutants and greenhouse gas (GHG) emissions.</p>	Complied

		<p>Significant pollutants and GHG such as: Emission, particulate, noise from boiler and generator, effluent from mill wastewater, fertilizer application, chemical applicator and transport of FFB.</p> <p>Monitoring of air emissions and ambient air quality conducted every semester. Emissions test conducted testing by Accreditation Laboratory. The results of the analysis have been demonstrated and reported to Environmental Agency every six months.</p>	
<p>Criteria 7.11: Fire is not used for preparing land and is prevented in the managed area.</p>			
7.11.1	<p>(C) Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance -</p>	<p>Based on field visit in block in Ukui Estate, the land preparation is using mechanical method. No open burning was noted for land preparation. It can also demonstrate in the agreement contract between company and subcontractor that all activity of replanting is performed manual and mechanically.</p> <p>Scheme Smallholder: There was not any open burning was noted for land preparation". During field visit at During field observation and interview with sample of smallholders at KUD Bina Usaha Baru, KUD Sawit Subur, KUD Karya Bersama and KUD Sumber Bahagia, there was a replanting and no burning activity. The auditor saw directly that the land preparation is using mechanical method.</p>	Complied
7.11.2	<p>The unit of certification establishes fire prevention and control measures for lands that are directly managed by the unit of certification. - Minor compliance -</p>	<p>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 years 1988, 1989, 1990 and 1991.</p> <p>Replanting has been done mechanically, consisting of: falling tree, chipping by excavator, terracing by excavator, digging, road construction, ditch/waterways construction, planting LCC and planting oil palm. Company has established "Ketentuan Replanting areal Mineral" tahun 2016. In the mechanism explained that replanting must be conducted mechanically without burning.</p>	Complied

		<p>Based on field visit in block in Ukui Estate, the land preparation is using mechanical method. No open burning was noted for land preparation. It can also demonstrate in the agreement contract between company and subcontractor that all activity of replanting is performed manual and mechanically.</p> <p>During field observation and interview with sample of smallholders at KUD Bina Usaha Baru, KUD Sawit Subur, KUD Karya Bersama and KUD Sumber Bahagia, there was a replanting and no burning activity. The auditor saw directly that the land preparation is using mechanical method.</p>	
7.11.3	<p>The unit of certification engages stakeholders in adjacent locations for fire prevention and control measures.</p> <p>- Minor compliance -</p>	<p>The policy has communicated to all smallholders remember and local community to engages stakeholders in adjacent locations for fire prevention and control measures.</p> <p>Replanting has been done mechanically, consist of: falling tree, chipping by excavator, terracing by excavator, digging, road construction, ditch/waterways construction, planting LCC and planting oil palm. Company has established "Ketentuan Replanting areal Mineral" tahun 2016. In the mechanism explained that replanting must be conducted mechanically without burning.</p>	Complied

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

PROCEDURAL NOTE for 7.12:

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

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

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

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

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<p>The development of this procedure will be guided by the No Deforestation Joint Steering Group (NDJSG) between the RSPO and HCSA members. In HFCC countries, RSPO will work with governments, communities and other stakeholders to develop this procedure through participatory processes at national and regional levels. The duration of this activity is specified in the Terms of Reference for NDJSG and is publicly available.</p>			
<p>7.12.1</p>	<p>(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged 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). - Critical (Major) compliance -</p>	<p>PT Inti Indosawit Subur – Ukui Group Certification unit and supply bases (including smallholder) did not carry out any new plantings after November 2005. The planting year started in 1987, 1988, 1989, and the company and scheme smallholder has starts replanting in 2015 – present.</p>	<p>Complied</p>
<p>7.12.2</p>	<p>(C) HCV and HCS forests, and other conservation areas are identified as follows: - Critical (Major) compliance - 7.12.2a) For existing plantations, with an HCV assessments conducted by RSPO- approved assessors and have no new land clearing after 15 November 2018, the existing HCV assessments remains valid.</p>	<p>During audit ASA 2.2 there is no additional expansion or new planting of plantation PT Inti Indosawit Subur Ukui Group. Existing HCV area are managed and maintain accordingly. 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 and soil conservation), Handian Purwawangsa, S.Hut, MSI, (social), Iing Nasihin S.Hut, MSi (flora and GIS), Tutut Sunarminto, MSi, (social and cultural), Yanti Apriyanti, S.Pi (social and cultural), Rizki Ratna Ayu Paramita Sari, S.Hut (social and cultural). The HCV assessment identified the presence of HCV 1.1, HCV 1.2, HCV 1.3, HCV 2.3, HCV 4.1 and HCV 6 with total (under PT Inti Indosawit Subur – Ukui Group/Ukui Estate, Sei</p>	<p>Complied</p>

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Lala Estate and Soga Estate) of 234.458 Ha. For Ukui Estate the HCV area is 118 Ha.

HCV identified in Ukui Estate:

HCV	Status	Ha
River/Sungai Air Hitam Kiri	1.1, 1.2, 1.3, 4.1	47.071
River/Sungai Air Hitam Kanan	1.1, 1.2, 1.3, 4.1	24.824
Tributary/Anak Sungai Air Hitam Atas	1.1, 1.2, 4.1	15.926
Tributary/Anak Sungai Air Hitam kiri	1.1, 1.2, 4.1	14.031
Tributary/Anak-anak Sungai Napuh	1.1, 1.2, 4.1	6.891
Lake/Danau (Rawa) Bengkuang	1.1, 1.2, 1.3, 4.1	1.925
Water reservoir/Kolam (Danau) Ukui I POM	1.1, 4.1	3.367
Protected Forest/Hutan Makam Keramat	1.2, 1.3, 2.3, 6	3.965
Total		118

Most of the HCV identified, located within the existing plantation. Company maintains the riparian area. A number of fauna identified in the plantation area: Mammals such as "Kucing kuwuk" (*Felis bengalensis*), "Kancil" (*Tragulus javanicus*), "Kijang" (*Muntiacus muntjak*), "Trenggiling" (*Manis javanica*), Monkey (*Macaca fascicularis*), "Beruk" (*Macaca nemestrina*), "Musang" (*Paradoxurus hermaphroditus*). Birds such as "Raja udang meninting" (*Alcedo meninting*), "Burung madu" (*Aethopyga siparaja* and *Nectarinia jugularis*), "Elang tikus" (*Elanus caeruleus*), "Elang ular bido" (*Spilomis cheela*), "Cekakak belukar" (*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*).

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		<p>HCV assessment performed in consultation with relevant stakeholders/public consultation. The HCV identification report was peer reviewed by WWF on 10/25/2010 - 10/27/2010.</p> <p>During field visit, HCV area identified are manage and monitor accordingly according to Conservation Management and Monitoring Plan.</p>	
	<p>7.12.2 b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the latest HCSA Toolkit and HCV-HCSA Assessment Manual that is applicable at the time of the assessment. This includes stakeholder consultation and take into account wider landscape- level consideration.</p>	<p>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 started replanting in 2015 – present.</p>	
7.12.3	<p>(C) In High Forest Cover Landscapes (HFCLs) within HFCCs, a specific procedure will apply for legacy cases and development by indigenous peoples and local communities with legal or customary rights, taking into consideration regional and national multi-stakeholder processes. Until this procedure is developed and endorsed, 7.12.2 applies.</p> <p>- Critical (Major) compliance -</p>	<p>Based on HCV assessment report and field observation confirmed that there is no High Forest Cover Landscapes (HFCLs) within area of PT Inti Indosawit Subur Ukui Estate.</p> <p>PT Inti Indosawit Subur Ukui Estate was located in another purpose area and not in forest area.</p> <p>This indicator not applicable.</p>	Not Applicable
<p>PROCEDURAL NOTE for 7.12.3: Indicator 7.12.3. is not relevant to Indonesia, until further decisions by the RSPO.</p>			
7.12.4	<p>(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An Integrated management plans to protect and/or enhance HCV and HCS forests, peatland and other conservation areas are developed, implemented and adapted if necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan was developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p>	<p>PT Inti Indosawit Subur – 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.</p> <p>According to HCV assessment 2010, there is no High Forest Cover Landscapes (HFCLs) identified. Most of the HCV identified, located within the existing plantation.</p> <p>Conservation management plan Ukui Group (Ukui Estate) update in January 2023, consist of:</p>	Complied

	<p>- Critical (Major) compliance -</p>	<ul style="list-style-type: none"> • 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 • Water surface quality monitoring in the river. • Biodiversity monitoring. • Protection and monitoring of HCV area. <p>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 2022 and July – December 2022".</p> <p>Monitoring documentation such as: "Daftar Temuan Satwa liar di Areal kebun" contain information regarding result of wildlife and RTE species monitoring, "Tabel Monitoring Kerusakan Kawasan Lindung" contain information regarding result of HCV area monitoring and HCV condition monitoring such as illegal hunting, HCV area disturbance, and HCV condition. According to HCV management and monitoring report semester I and II year 2022, it was reported that there is no HCV area disturbance/destruction, wildlife monitoring found presence of animal such as:</p> <p>Aves: <i>Centropus bengalensis</i>, <i>Halcyon smyrnensis</i> (protected), <i>Orthotomus sepium</i>, <i>Amaurornis phoenicurus</i> (protected), <i>Rhipidura javanica</i> (protected), <i>Pycnonotus galavie</i>, <i>Prinia polychroa</i>, <i>Alcedo meninting</i> (protected).</p> <p>Reptilia: <i>Varanus salvator</i>, <i>Fejevarya sp</i></p> <p>Mamalia: <i>Macaca fascicularis</i>, <i>Sus crofa</i>, <i>Calosciurus notatus</i>,</p>	
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		<p>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.</p> <p>Socialisation and awareness to employee regarding HCV has been conducted regularly through master morning, sample seen socialization in 20 March 2023 to workers of Ukui I Estate, socialization on 18 october 2022 to surrounding community of Ukui I Estate (representative of smallholder, Air emas village).</p> <p>Scheme Smallholder: Conservation management plan Plasma Ukui (Scheme Smallholder) update on 2 January 2023, consist of:</p> <ol style="list-style-type: none"> 1. Biodiversity monitoring 2. Signboard maintenance 3. Socialization of HCV area 4. Riparian protection 5. Prohibiting chemical application in riparian zone/river border <p>Each KUD has appointed person in charge to monitor the RTE species presence in smallholder plantation area:</p> <ul style="list-style-type: none"> - KUD Mekar Abadi: Surat Keputusan Pengurus KUD Mekar Abadi Nomor: 037/KUD-MA/SK/TJ/I/2021 dated 4 January 2021 Tentang 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 	
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		<p>Penunjukan/Pengangkatan Pengurus HCV dan Perlindungan Satwa Liar KUD Karya Tani. appointed person: Herman.</p> <p>HCV training and socialization to smallholder member has been conducted on 18 October 2022 to all smallholder group and KUD. Minutes of socialization and attendance list are available.</p> <p>Monitoring for RTE species performed each month by PIC. Result of monitoring presented in "Formulir Daftar Temuan Satwa Liar Tahun 2022/2023". During January – December 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 hermaphroditus</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>).</p>	
7.12.5	<p>Where rights of local communities have been identified in HCV areas and HCS forest after 15 November 2018, peatland and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p> <p>- Minor compliance -</p>	<p>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.</p> <p>Therefore, the requirement of this indicator is not applicable.</p>	Not Applicable
7.12.6	<p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p>- Minor compliance -</p>	<p>Ukui Estate:</p> <p>A number of fauna identified in the plantation area: Mammals such as "Kucing kuwuk" (<i>Felis bengalensis</i>), "Kancil" (<i>Tragulus javanicus</i>), "Kijang" (<i>Muntiacus muntjak</i>), "Trenggiling" (<i>Manis javanica</i>), Monkey (<i>Macaca fascicularis</i>), "Beruk" (<i>Macaca nemestrina</i>), "Musang" (<i>Paradoxurus hermaphroditus</i>). Birds such as "Raja udang meninting" (<i>Alcedo meninting</i>), "Burung madu" (<i>Aethopyga siparaja</i> and <i>Nectarinia jugularis</i>), "Elang tikus" (<i>Elanus caeruleus</i>), "Elang ular bido" (<i>Spilomis cheela</i>), "Cekakak belukar" (<i>Halicyon smymensis</i>), "Kipasan belang" (<i>Rhipidura</i></p>	Complied

		<p><i>javanica</i>). Reptile such as "Ular Piton" (<i>Phyton molurus</i>), Biawak (<i>Varanus salvator</i>).</p> <p>Identified also protected plants such as "Meranti batu" (<i>Shorea leprosula</i>), "Meranti bunga" (<i>Shorea teysmanniana</i>).</p> <p>Company has prepared a procedure for protection of flora and fauna, explained in Environmental Management System: Biodiversity (AA-432-002e-LT), IUCN redlist (AA-432-006-LT), CITES list (AA-432-07-LT).</p> <p>Estate has established the 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 2023 consist of:</p> <ul style="list-style-type: none"> • 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. • Water surface quality monitoring in the river. • Biodiversity monitoring. • Protection and monitoring of HCV area. <p>Signboards are placed on the area identified with conservation values. Monitoring for the HCVs are carried out as per Conservation Management Plan. The conservation management plan covers area enhancement, socialization to workers and local communities, prohibition of chemical regime near the area and river buffer zone' restoration. Plan for monitoring and patrol has been incorporated into the management and monitoring plan. Another effort planned was to have HCV sign board and "no-hunting" sign boards placed near identified HCV areas – on progress.</p>	
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		<p>PT Inti Indosawit Subur – Ukui Group is also having procedure to monitor the protected/conservation area as per “SOP Pemantauan Areal Lindung” No. AA-PL-08-EFP – describing procedure for vegetation monitoring, wildlife monitoring (path and rapid method), conservation area inspection procedure, vegetation enhancement procedure and data analysis procedure.</p> <p>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 Tahun 2022 can be demonstrate that the measures contained in the management plan been actively implemented. According to HCV management and monitoring report semester I and II year 2022, it was reported that there is no HCV area disturbance/destruction, wildlife monitoring found presence of animal such as:</p> <ul style="list-style-type: none"> • Aves: <i>Centropus bengalensis</i>, <i>Halcyon smyrnensis</i> (protected), <i>Orthotomus sepium</i>, <i>Amaurornis phoenicurus</i> (protected), <i>Rhipidura javanica</i> (protected), <i>Pycnonotus galavie</i>, <i>Prinia polychroa</i>, <i>Alcedo meninting</i> (protected). • Reptilia: <i>Varanus salvator</i>, <i>Fejevarya sp</i> • Mamalia: <i>Macaca fascicularis</i>, <i>Sus crofa</i>, <i>Calosciurus notatus</i>, <p>Monthly monitoring of HCV area condition and animal species also performed by Foreman HCV (Rico siregar) and each Foreman Afdeling, animal presence recorded in “<i>Daftar Temuan Satwa Liar</i>”.</p> <p>Company continuously disseminating HCV and wildlife protection to employee and surrounding community. Sample seen for socialization on 20 March 2023 to workers of Ukui I Estate, socialization on 18 October 2022 to surrounding community of Ukui I Estate (representative of smallholder, Air Emas village).</p> <p>Scheme Smallholder:</p>	
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		<p>The management of Ukui Smallholder has developed the Conservation Management Plan 2022, updated on 2 January 2022 consist of:</p> <ul style="list-style-type: none"> - HCV 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. <p>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.</p> <p>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 coordinate 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.</p> <p>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 "Laporan Pencatatan Temuan Flora dan Fauna Kebun Plasma Ukui" to BKSDA Riau as per "Daftar Distribusi Eksternal" dated 16 March 2023. Latest monitoring semester II 2022, RTE species found in Plasma Ukui such as: Burung Madu sriganti (<i>Nectarinia jugularis</i>), Cekakak belukar (<i>Halcyon smyrnensis</i>), Elang ular bido (<i>Spilornis cheela</i>), Kucing hutan (<i>Prionailurus bengalensis</i>), Cekakak belukar (<i>Halcyon smyrnensis</i>), Elang tikus (<i>Elanus caeruleus</i>), Trenggiling (<i>Manis javanica</i>), Monyet beruk (<i>Macaca nemestrina</i>), Berang-berang (<i>Lutra lutra</i>).</p>	
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		<p>Ukui Plasma management continuously disseminating HCV and wildlife protection to smallholder member and surrounding community. Sample seen on socialization on 18 October 2022 at Basecamp Central Ukui Estate.</p>	
<p>7.12.7</p>	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p> <p>- Minor compliance -</p>	<p>HCV and wildlife/animal monitoring continuously conducted in a regular basis. Secondary monitoring conducted each month and primary monitoring conducted twice a year.</p> <p>Monitoring of animal/wildlife performed by HCV/Sustainability officer and field workers, result of monitoring presented in "<i>Laporan Pemantauan Jenis Satwa/Tumbuhah</i>".</p> <p>Report of Management and Monitoring for HCV and RTEs is reported every 6 months and review is conducted regularly to ensure that monitoring is effective. Reports period semester I & II year 2022 can be demonstrated. Results of monitoring was evaluated using trend evaluation. According to HCV management and monitoring report semester I and II year 2022, it was reported that there is no HCV area disturbance/destruction, wildlife monitoring found presence of animal such as:</p> <p>Aves: <i>Centropus bengalensis</i>, <i>Halcyon smyrnensis</i> (protected), <i>Orthotomus sepium</i>, <i>Amaurornis phoenicurus</i> (protected), <i>Rhipidura javanica</i> (protected), <i>Pycnonotus galavier</i>, <i>Prinia polychroa</i>, <i>Alcedo meninting</i> (protected).</p> <p>Reptilia: <i>Varanus salvator</i>, <i>Fejevaryya sp</i></p> <p>Mamalia: <i>Macaca fascicularis</i>, <i>Sus crofa</i>, <i>Calosciurus notatus</i>.</p> <p>Report of HCV management and monitoring semester I and II year 2022 has been reported to Balai Konservasi Sumber Daya Alam Provinsi Riau on 16 March 2023, receipt in "daftar Distribusi Eksternal".</p> <p>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".</p>	<p>Complied</p>

		<p>Result of monitoring gives the feedback into the management plan improvement. The results from monitoring of wildlife, environmental, and socio-cultural services give feedback advice and recommendations to the management plan.</p>	
<p>7.12.8</p>	<p>(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV- HCSA assessment since 15 November 2018, the Remediation and Compensation Procedures (RaCP) applies. - Critical (Major) compliance -</p>	<p>Ukui Estate: Company has consistently monitors the status of HCV area, as well as protected flora and fauna species. This is recorded in "<i>Laporan Monitoring Pengelolaan Tumbuhan dan Satwa Nilai Konservasi Tinggi PT Inti Indosawit Subur Kebun Ukui, Sei Lala dan Soga</i> period Semester I & II year 2022" (monitoring period January – December 2022). The report explains the monitoring on status of plant and wildlife, disturbance and damage to the protected area. According to HCV management and monitoring report semester I and II year 2022, it was reported that there is no HCV area disturbance/destruction, wildlife monitoring found presence of animal such as: <i>Aves: Centropus bengalensis, Halcyon smyrnensis</i> (protected), <i>Orthotomus sepium, Amaurornis phoenicurus</i> (protected), <i>Rhipidura javanica</i> (protected), <i>Pycnonotus galavie, Prinia polychroa, Alcedo meninting</i> (protected). <i>Reptilia: Varanus salvator, Fejevaryya sp</i> <i>Mamalia: Macaca fascicularis, Sus crofa, Calosciurus notatus.</i> 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." Scheme Smallholder: Management of Ukui Smallholder has defined the mechanism for individual members to report on threats to HCVs in the procedure "Konflik</p>	<p>Complied</p>

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		<p>Dengan Satwa Yang Dilindungi No. 015/DOK/SOP/PT.KLU-AA/2016" dated 2 December 2016.</p> <p>All member has responsible to report the presence of RTE species, animal conflict, and threats to HCVs in their kavling. They report to KUD or KT and forward to Smallholder Manager. Since latest audit until this audit, there is no animal conflict and hunting reported, it was also confirmed during field audit and interview with smallholder member at KUD Mekar Abadi, KUD Karya Tani and KUD Tani Subur.</p> <p>Plasma Ukui has performed monitoring of wildlife each month by WKAK (Wadah Kerja Antar Kelompok) or head of KT (Pengurus Perlindungan Satwa Liar). Each KUD has assigned the PIC to monitor the protected animal and species based on decree letter issued by KUD. Sample seen:</p> <ul style="list-style-type: none"> - KUD Mekar Abadi: Surat Keputusan Pengurus KUD Mekar Abadi Nomor: 037/KUD-MA/SK/TJ/I/2021 dated 4 January 2021 Tentang 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. <p>Latest monitoring in December 2022 there were found the presence of Cekakak belukar (<i>Halcyon smyrnensis</i>), Biawak (<i>Varanus salvator</i>), Elang ular (<i>Spilornis cheela</i>), Ular Kobra (<i>Naja sumatrana</i>), Kucing hutan (<i>Prionailurus bengalensis</i>), Raja udang (<i>Alcedo coerulescens</i>), Elang tikus (<i>Elanus caeruleus</i>),</p>	
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		Smallholder management reported the management and monitoring of HCV including the animal presence each semester to company and BKSDA of Riau Province and Environmental Agency of Pelalawan Regency.	
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Appendix B: GHG Reporting Executive Summary

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

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

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

Emission per product	tCO ₂ e/tProduct
CPO	0.23
PKO	0.23

Extraction	%
OER	18.31
KER	4.38

Production	t/yr
FFB Process	333,083.00
CPO Produced	60971
PKO Produced	14601

Land Use	Ha
OP Planted Area	10594.29
OP Planted on peat	0.00
Conservation (forested)	0.00
Conservation (non-forested)	118
Total	10,594.29

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	33,412.63	0.42	0.00	0.00	0.00	0.00	33,412.63	0.42
CO ₂ Emission from fertilizer	2,618.32	0.03	1,730.02	0.01	0.00	0.00	4,348.34	0.04
NO ₂ Emission from fertilizer	2,145.06	0.03	2,176.34	0.02	0.00	0.00	4,321.40	0.05
Fuel Consumption	523.64	0.01	729.23	0.01	0.00	0.00	1,252.87	0.02
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sink								
Crop Sequestration	-31,670.74	-0.40	0.00	0.00	0.00	0.00	-31,670.74	-0.40
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	7,028.91	0.09	4,635.59	0.04	11,949.93	0.00	23,614.43	0.13

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**Note: Includes both estates and smallholders*

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	16,347.11	0.05
Fuel Consumption	205.58	0.00
Grid Electricity Utilization	45.88	0.00
Credit		
Export of Grid Electricity	-0.03	0.00
Sales of PKS	-22,583.00	-0.07
Sales of EFB	0.00	0.00
Total	-5,984.46	-0.02

Summary of Kernel Crusher Emission and Credit (if applicable)

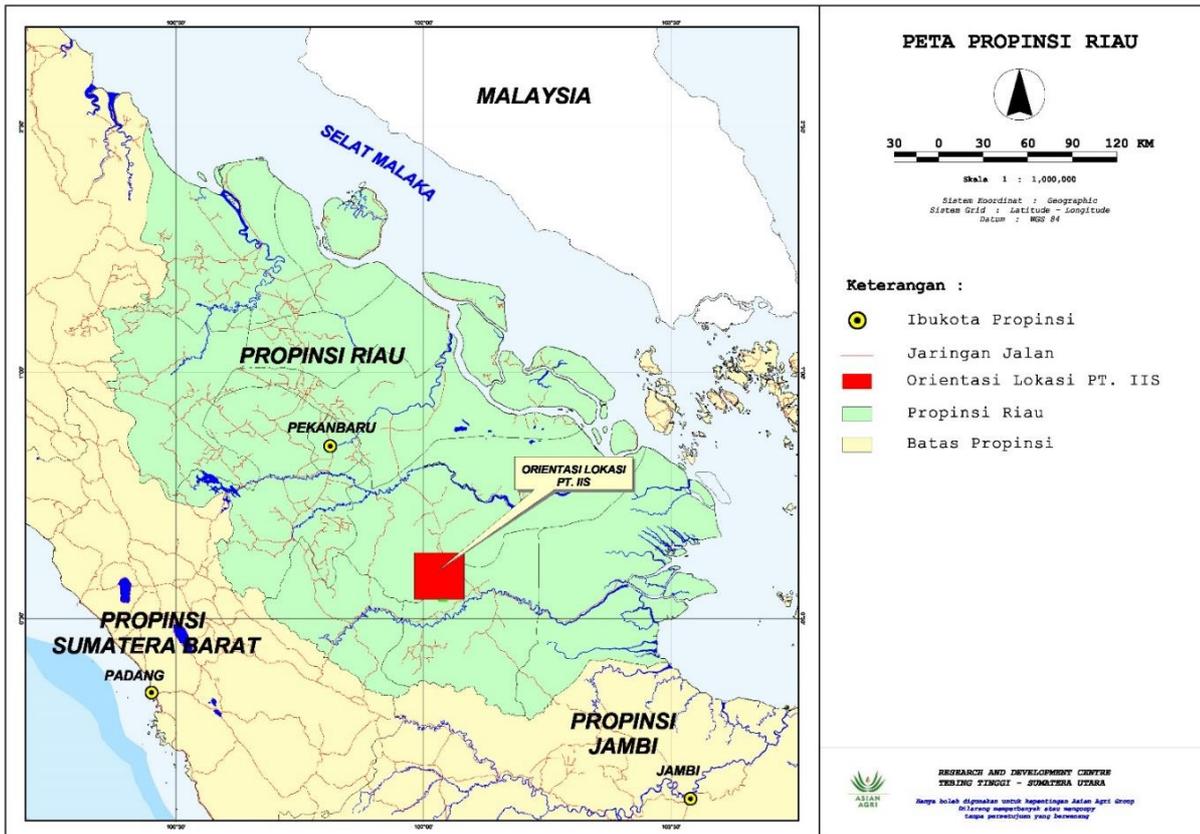
Emissions	tCO ₂ e
PK from own mill	8,819.12
PK from other source	0.00
Fuel Consumptions	0.00
Total Crusher emissions	8,819.12

*This mill has no kernel crusher operation.

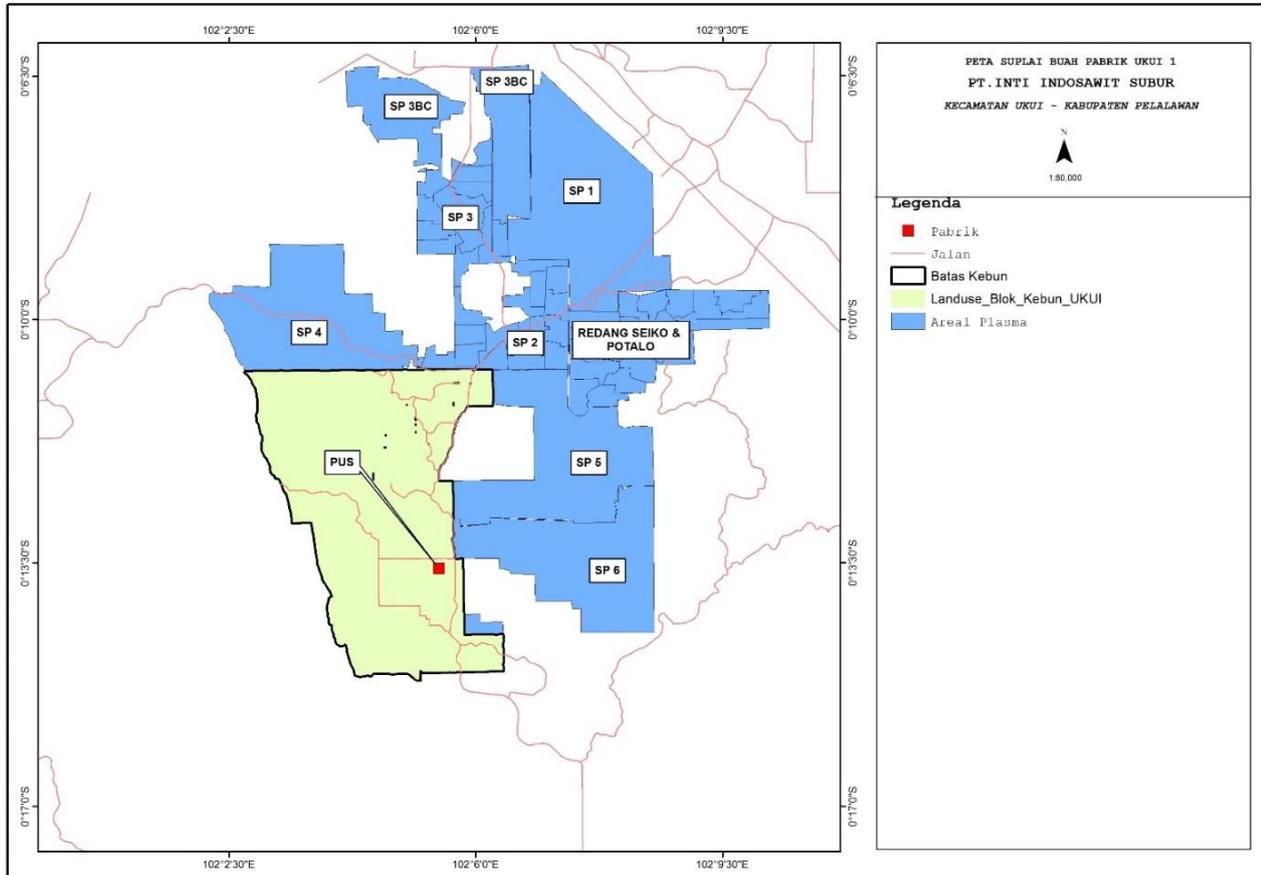
Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	0
Divert to anaerobic diversion (%)	0

POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	20.2
Divert to methane captured (flaring) (%)	3.66
Divert to methane captured (energy generation) (%)	76.14

Appendix C: Location Map of Certification Unit and Supply bases



Appendix D: Estate Field Map



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Appendix E: List of Smallholder Registered and/or sampled

No	Name of farmer	Location (Village)	Plot Number	GPS Reference		Area Summary (Ha)		Forecasted annual FFB Production (MT)	Date of joining	Smallholder ID
				Latitude (S)	Longitude (E)	Total Certified Area	Planted Area			
KUD Sumber Bahagia										
1	Najar	Silikuan village, Ukui Sub-District, Pelalawan Regency, Riau Province	103	0° 12' 50.44" S	102° 6' 15.15" E	2	2	25	2020	2249
2	Stevanus Jado		103	0° 12' 58.87" S	102° 6' 52.89" E	2	2	25	2020	2324
3	Suhariyadi		103	0° 13' 03.65" S	102° 6' 43.97" E	2	2	25	2020	2363
4	Sunarti		103	0° 12' 57.34" S	102° 6' 41.23" E	2	2	25	2020	2327
5	Surip, SE,M.Pd		103	0° 13' 04.20" S	102° 6' 52.70" E	2	2	25	2020	2364
6	Suwandi		103	0° 12' 55.84" S	102° 6' 43.84" E	2	2	25	2020	2326
7	Karmi		103	0° 12' 52.25" S	102° 6' 53.83" E	2	2	25	2020	2261
8	Aji		125	0° 12' 56.84" S	102° 6' 02.26" E	2	2	25	2020	2339
9	Aditya Ibnu Aldiansyah		125	0° 12' 58.08" S	102° 5' 52.69" E	2	2	25	2020	2342
10	Katemin		125	0° 13' 08.98" S	102° 6' 19.25" E	2	2	25	2020	2438
11	Purwanto		125	0° 13' 17.53" S	102° 5' 51.69" E	2	2	25	2020	2452
12	Sutarmi		125	0° 13' 04.48" S	102° 5' 51.27" E	2	2	25	2020	2347
13	Wawan Irmawanto		125	0° 13' 56.55" S	102° 6' 56.84" E	2	2	25	2020	2338
14	Iswinarto		208	0° 13' 33.62" S	102° 7' 29.59" E	2	2	25	2020	4717
15	Mardiono		208	0° 13' 39.44" S	102° 7' 29.10" E	2	2	25	2020	4751
16	Saringat		208	0° 13' 24.90" S	102° 7' 11.43" E	2	2	25	2020	4712
17	Sugiyoto		208	0° 12' 57.24" S	102° 6' 49.27" E	2	2	25	2020	4715
18	Johaner Purba		208	0° 13' 30.52" S	102° 7' 15.02" E	2	2	25	2020	4721
19	Muhammad Aziz Arummansyah		280	0° 13' 55.57" S	102° 6' 53.40" E	2	2	25	2020	4787
20	Mey Cristine		280	0° 13' 37.16" S	102° 7' 05.84" E	2	2	25	2020	4744
21	Nur Kholis		280	0° 13' 55.89" S	102° 6' 59.63" E	2	2	25	2020	4785
22	Sungkem		280	0° 13' 45.00" S	102° 7' 18.44" E	2	2	25	2020	4755
23	Surtiyah		280	0° 13' 05.62" S	102° 7' 02.70" E	2	2	25	2020	4784
24	Kapri Yunus		280	0° 13' 48.96" S	102° 6' 53.24" E	2	2	25	2020	4765
Kud Bina Usaha Baru										
1	Suyatin	Bukit Jaya village, Ukui Sub-District, Pelalawan Regency, Riau Province	26	0°10' 02.27" S	102° 7' 05.72" E	2	2	60	2017	615
2	Fujiati		26	0° 10' 03.78" S	102° 7' 12.52" E	2	2	60	2017	616
3	Sarju		26	0° 10' 05.53" S	102° 7' 05.68" E	2	2	60	2017	620
4	Mulyono		26	0° 09' 55.80" S	102° 7' 05.85" E	2	2	60	2017	597
5	Satijan		24	0° 10' 13.83" S	102° 6' 40.01" E	2	2	60	2017	647
6	Jumiyo		24	0° 10' 20.48" S	102° 6' 40.19" E	2	2	60	2017	676
7	Nurdin		24	0° 10' 17.12" S	102° 6' 40.11" E	2	2	60	2017	677
8	Masria		24	0° 10' 23.59" S	102° 6' 40.26" E	2	2	60	2017	694
9	Stefanus Supito		24	0° 10' 20.48" S	102° 6' 40.19" E	2	2	60	2017	693
10	Sudarmanto		25	0° 10' 02.79" S	102° 6' 58.91" E	2	2	60	2017	621

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				Latitude (S)	Longitude (E)	Total Certified Area	Planted Area			
11	Satijan		25	0° 10' 7.147" S	102° 6' 40.108" E	2	2	60	2017	623
12	Asngari		25	0° 10' 10.006" S	102° 6' 54.011" E	2	2	60	2017	638
13	Hartono		25	0° 10' 13.508" S	102° 6' 52.924" E	2	2	60	2017	646
14	Badri		25	0° 10' 7.694" S	102° 6' 46.307" E	2	2	60	2017	622
15	Ruslan		28	0° 8' 58.971" S	102° 6' 21.265" E	2	2	60	2017	1101
16	Anwar Febrianto		28	0° 8' 58.971" S	102° 6' 21.265" E	2	2	60	2017	1102
17	Masrukin		28	0° 9' 2.333" S	102° 6' 21.197" E	2	2	60	2017	1118
18	Ardi Wafda		28	0° 9' 2.466" S	102° 6' 22.863" E	2	2	60	2017	1119
KUD Sawit Subur										
1	Sriyatun	Kampung Baru village, Ukui Sub-District, Pelalawan Regency, Riau Province	48	0° 09' 15.50" S	102° 03' 39.81" E	2	2	50	2019	1527
2	Istianah / Muhtaryo		48	0° 09' 20.70" S	102° 03' 50.00" E	2	2	50	2019	1513
3	Nanik Sudarsini		48	0° 09' 32.26" S	102° 04' 05.30" E	2	2	50	2019	1493
4	Nova Ardiansyah		48	0° 09' 42.66" S	102° 04' 04.84" E	2	2	50	2019	1447
5	Sobandi		48	0° 09' 33.60" S	102° 03' 56.80" E	2	2	50	2019	1492
6	Sugiono		48	0° 09' 39.00" S	102° 04' 00.20" E	2	2	50	2019	1462
7	Ariyanto		49	0° 10' 04.20" S	102° 04' 14.50" E	2	2	50	2019	1458
8	Sumakno		49	0° 09' 51.20" S	102° 04' 14.40" E	2	2	50	2019	1411
9	Suparmin		49	0° 09' 57.47" S	102° 04' 17.80" E	2	2	50	2019	1397
210	Sutoyo		49	0° 09' 57.34" S	102° 02' 21.26" E	2	2	50	2019	1398
11	Warsono		49	0° 09' 42.50" S	102° 04' 28.00" E	2	2	50	2019	1457
12	Slamet		50	0° 09' 43.10" S	102° 02' 49.80" E	2	2	50	2019	1442
13	Sukidi		50	0° 09' 56.20" S	102° 02' 28.80" E	2	2	50	2019	1379
14	Sumijah		50	0° 09' 30.46" S	102° 02' 56.19" E	2	2	50	2019	1484
15	Utui Tatang Aristyana		50	0° 09' 43.04" S	102° 02' 35.67" E	2	2	50	2019	1436
16	Uus Usman Hanafi		51	0° 09' 49.70" S	102° 02' 59.20" E	2	2	50	2019	1418
17	Misni		51	0° 09' 43.10" S	102° 02' 56.00" E	2	2	50	2019	1444
18	Tumijan		51	0° 09' 55.80" S	102° 03' 11.30" E	2	2	50	2019	1392
19	Susanto		51	0° 10' 02.79" S	102° 03' 04.97" E	2	2	50	2019	1367
20	Suparno		51	0° 09' 49.78" S	102° 03' 05.39" E	2	2	50	2019	1417
21	Aman Suratman		51	0° 10' 02.80" S	102° 03' 05.00" E	2	2	50	2019	1366
KUD Karya Bersama										
1	Inan	Air Emas village, Ukui Sub-District, Pelalawan Regency, Riau Province	1	0° 09' 28.45" S	102° 6' 53.18" E	2	2	0	2021	843
2	Sutarman		1	0° 09' 31.67" S	102° 6' 52.99" E	2	2	0	2021	846
3	Kariman		1	0° 09' 45.01" S	102° 6' 46.63" E	2	2	0	2021	853
4	Lasiman		1	0° 09' 22.29" S	102° 6' 46.88" E	2	2	0	2021	826
5	Matnur		1	0° 09' 25.56" S	102° 6' 46.96" E	2	2	0	2021	834
6	Yahman		1	0° 10' 23.82" S	102° 5' 42.58" E	2	2	0	2021	47
7	Endang		1	0° 09' 21.94" S	102° 6' 53.33" E	2	2	0	2021	827

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No	Name of farmer	Location (Village)	Plot Number	GPS Reference		Area Summary (Ha)		Forecasted annual FFB Production (MT)	Date of joining	Smallholder ID
				Latitude (S)	Longitude (E)	Total Certified Area	Planted Area			
8	Sukimin		1	0° 09' 20.94" S	102° 07' 00.00" E	2	2	0	2021	828
9	Hadi Sutrisno		13	0° 08' 55.85" S	102° 06' 21.11" E	2	2	0	2021	271
10	Joko Santoso		13	0° 08' 49.33" S	102° 06' 14.26" E	2	2	0	2021	270
11	Pujiono		13	0° 08' 52.38" S	102° 06' 14.32" E	2	2	0	2021	269
12	Suyana		13	0° 08' 46.08" S	102° 06' 14.05" E	2	2	0	2021	257
13	Tugino		13	0° 08' 36.34" S	102° 06' 20.92" E	2	2	0	2021	238
14	Parmi		13	0° 08' 39.74" S	102° 06' 21.06" E	2	2	0	2021	237
15	Rakiyo		13	0° 08' 36.82" S	102° 06' 27.13" E	2	2	0	2021	239
16	Saimin		13	0° 08' 43.20" S	102° 06' 14.20" E	2	2	0	2021	253
17	Didik Supriyanto		14	0° 08' 52.38" S	102° 06' 14.32" E	2	2	0	2021	279
18	Kliwon		14	0° 08' 55.27" S	102° 06' 14.29" E	2	2	0	2021	277
19	Rokhani		14	0° 08' 52.38" S	102° 06' 14.32" E	2	2	0	2021	278
20	Suparno		14	0° 09' 02.33" S	102° 06' 21.20" E	2	2	0	2021	297
21	Sriyadi		14	0° 09' 02.58" S	102° 06' 27.37" E	2	2	0	2021	284
Total						168	168	N/A	N/A	N/A

Note: smallholders sampled in this audit.

Appendix F: List of Abbreviations

a.i.	Active Ingredient
BOD	Biochemical Oxygen Demand
CB	Certification Bodies
CHRA	Chemical Health Risk Assessment
COD	Chemical Oxygen Demand
CPO	Crude Palm Oil
CSPO	Certified Sustainable Palm Oil
CSPKO	Certified Sustainable Palm Kernel Oil
EFB	Empty Fruit Bunch
EHS	Environmental, Health and Safety
EIA	Environmental Impact Assessment
EMS	Environmental Management System
FFB	Fresh Fruit Bunch
FPIC	Free, Prior, Informed and Consent
GAP	Good Agricultural Practice
GHG	Greenhouse Gas
GMP	Good Manufacturing Practice
GPS	Global Positioning System
HCV	High Conservation Value
IPM	Integrated Pest Management
IP	Identity Preserved
IS - CSPO	Independent Smallholder Certified Sustainable Palm Oil
IS – CSPKO	Independent Smallholder Certified Sustainable Palm Kernel Oil
IS – CSPKE	Independent Smallholder Certified Sustainable Palm Kernel Expeller
ISCC	International Sustainable Carbon Certification
ISS	Independent Smallholder Standard
LD50	Lethal Dose for 50 sample
MB	Mass Balance
MSDS	Material Safety Data Sheet
MT	Metric Tones
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