

## RSPO PRINCIPLE AND CRITERIA PUBLIC SUMMARY REPORT

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

## Client Company Name / Parent Company: Sime Darby Plantation Berhad

Client Company / Parent Company Address: Level 11, Main Block, Plantation Tower, No. 2, Jalan PJU 1A/7, Ara Damansara 47301 Petaling Jaya, Selangor, Malaysia

**Certification Unit:** 

PT Indotruba Tengah – Sekunyir Palm Oil Mill

Location of Certification Unit:

Amin Jaya Village, Pangkalan Banteng Sub-District, Kotawaringin Barat District,
74183 Kalimantan Tengah Province, Indonesia

Date of Final Report: 03/08/2023



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### **Section 1: Scope of the Assessment**

1. Company Details					
Parent Company	Sime Darby Plantation Berhad	d			
RSPO Membership Number	1-0008-04-000-00	Membership	p Approval Date	07/09/2004	
Address	Level 11, Main Block, Plantation Tower, No. 2, Jalan PJU 1A/7, Ara Damansara 47301 Petaling Jaya, Selangor, Malaysia				
Palm Oil Mill / Group Manager / Estate (Certification Unit)	PT Indotruba Tengah – Sekunyir Palm Oil Mill				
Location / Address	Amin Jaya Village, Pangkalan Banteng Sub District, Kotawaringin Barat District, 74183 Kalimantan Tengah Province, Indonesia				
Website	www.simedarbyplantations.co	<u>om</u>			
Management Representative	Alagendran Maniam (Head of Sustainability and Quality Management – Minamas Plantation)  E-mail  alagendran.maniam@simedarbyplant ation.com				
Telephone	+62-21-29926000	Facsimile	+62-21-29922686	j	

2. Certification Information						
Certificate Number	RSPO 744702	Certificate Start Date	07/07/2022			
<b>Date of First Certification</b>	23/11/2010	Certificate Expiry Date	06/07/2027			
Scope of Certification	Production of Sustainable Cru	de Palm Oil (CPO) and Palm Ker	nel (PK).			
Visit Objectives	To conduct an annual certification assessment (ASA 2-1) and look for positive evidence to ensure that elements of the scope of certification and the requirements of the management standard are effectively addressed by the organisation's management system and that the system is demonstrating the ability to support the achievement of statutory, regulatory and contractual requirements and the organisation's specified objectives, as applicable with regard to the scope of the management standard, and to confirm the on-going achievement and applicability of the forward strategic plan and where applicable to identify potential areas for improvement of the management system.					
Assessment Cycle	☐ Pre-Assessment (Choose an item.)					
	☐ Initial Assessment					
	☐ Annual Surveillance Assessment (ASA 2_1)					
	☐ Recertification Assessment (Choose an item.)					
	☐ Scope Extension					
Applicable Standards /	RSPO Certification System for P&C and RSPO ISH 2020					
Normative Reference   Choose an item.						
	☑ Indonesia National Interp Sustainable Palm Oil	retation 2020 for RSPO P&C 2	018 for the Production of			



<b>Supply Chain Module</b>	☐ Identity Preserved; ☒ Mass Balance	Mill Capacity	45 MT/hour	
ISH certification Phase	□ Eligibility □ Milestone A □ Milestone B ⋈ Not Applicable			

3. Other Certifications						
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date			
SGS-ID-ISPO-0043	ISPO (Permentan 38 tahun 2020)	PT SGS Indonesia	11/08/2025			

4. Location(s) of Mill & Supply Bases							
Name	Location	GPS Coordinates					
(Mill / Supply Base / Group Manager / Smallholders)		Latitude	Longitude				
Sekunyir Palm Oil Mill	Amin Jaya Village, Pangkalan Banteng Sub District, Kotawaringin Barat District, Kalimantan Tengah Province, Indonesia	02° 26′ 41.00″ S	112° 00′ 25.00″ E				
Sekunyir Estate	Amin Jaya Village, Pangkalan Banteng Sub District, Kotawaringin Barat District, Kalimantan Tengah Province, Indonesia	02° 26′ 48.00″ S	112° 00′ 32.00″ E				
Seruyan Estate	Pembuang Hulu II Village, Hanau District, Seruyan Regency, Kalimantan Tengah Province, Indonesia	02° 24′ 28.00″ S	112° 04′ 05.00″ E				
Notes:		1					

5. Description of Supply Base						
New Planting Development	☑ No (no change in total planted area) ☐ Yes (please refer to Principle 7 for the planted area) ☐ Yes (please refer to Principle 7 for the planted area).					
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV Infrastructure Total Area (ha) & Other (ha) Pl				
Sekunyir Estate	3,287.33	52.26	215.60	3,555.19	92.46	
Seruyan Estate	3,194.65	45.48	939.27	4,179.40	76.43	
Total	6,481.98	97.74	1,154.87	7,734.59	83.80	
Notes:					•	



6. Plantings & Cycle						
Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Sekunyir Estate	508.12	1,504.51	0.00	1,274.70	2,779.21	508.12
Seruyan Estate	414.43	1,443.23	0.00	1,336.99	2,780.22	414.43
Total (ha)	922.55	2,947.74	0.00	2,611.69	5,559.43	922.55
Note: Only Mature area is considered as production area						

7. Summary of Certified Tonnage of FFB (Own Certified Scope)						
Estate /		Tonnage (MT) / year				
Smallholders	Estimated last year. (May 2022 – April		Actual (April 2022 – March 2023)			
	2023)	Previous license period (Apr 2022 – May 2022)	Current license period (Jun 2022– Mar 2023)	2024)		
Sekunyir Estate	67,994.35	12,128.00	44,832.04	45,870.64		
Seruyan Estate	57,903.65	11,266.50	44,130.46	68,947.36		
Total	125,898.00	112,3	57.02	114,818.00		
Note:						

8. Summary of Certified Tonnage of FFB (from other certified unit(s))						
Estate /	Tonnage (MT) / year					
Smallholders	Estimated last year. (May 2022 – April		Actual (Apr 2022 – Mar 2023)			
	2023)	Previous license period (Apl 2022 – May 2022)	Current license period (Jun 2022– Mar 2023)	2023)		
Nil						
Total	otal N/A					
Note:						



9. Summary of Non-Certified Tonnage of FFB (outside supplier — excluded from certificate)						
Out growers /		Tonnage (	MT) / year			
smallholders	Estimated last year. (May 2022 – April	Ac (April 2022 -	Forecast (May 2023 – April			
	2023)	Previous license period (Apr 2022 – May 2022)	Current license period (Jun 2022– Mar 2023)	2024)		
PT Indotruba Timur (ITR)	-	2,845.10	8,159.27	-		
Total	-	11,0	-			
Note:						

9A. I	9A. Monthly Records of Certified and Uncertified FFB Received since the last audit							
No.	Month - Year	Volume of FFB from certified supply base (mt)	Volume of FFB from uncertified supply base (mt)	Total FFB/Month (mt)				
1	April 2022	9,606.52	1,436.53	11,043.05				
2	May 2022	10,026.83	1,408.57	11,435.40				
3	June 2022	12,180.01	1,603.34	13,783.35				
4	July 2022	10,963.13	60.35	11,023.48				
5	August 2022	10,772.07	1,030.27	11,802.34				
6	September 2022	9,691.02	969.19	10,660.21				
7	October 2022	8,261.56	1,170.44	9,432.00				
8	November 2022	8,820.98	1,645.53	10,466.51				
9	December 2022	9,183.25	589.01	9,772.26				
10	January 2023	7,522.92	496.93	8,019.85				
11	February 2023	6,207.63	453.09	6,660.72				
12	March 2023	9,121.10	141.12	9,262.22				
TOTAL 112,357.02 11,004.37 123,361								
Note	:							



10. Summary of Certifie	d Tonnage (	(MT) (not a	pplicable for ISS)		
Estimated last year. (May 2022 – April 2023)	Actual (April 2022 – March 2023)			Actual (April 2022 – March	
		cense period – May 2022)	Current license period (June 2022– March 2023)	2023)	
FFB		F	FB	FFB	
125,898.00 mt	23,34	4.33 mt	88,771.71 mt	114,818 mt	
	TOTAL	<b>TOTAL</b> 112,116.04			
CPO (OER: 23.25%)		CPO (OEF	R: 22,01%)	CPO (OER: 22,00%)	
29,271.28 mt	4321	.31 mt	20,408.45 mt	25,260 mt	
	TOTAL	24,729.7	7 mt		
PK (KER: 5.00%)		PK (KER	: 4,23%)	PK (KER 4,00%)	
6,294.90 mt	830.	830.49 mt 3,922.20 mt		4,593 mt	
	<b>TOTAL</b> 4,752.69 mt				
Note:	•				

10A.	10A. Monthly Records of Certified CPO & PK since the last audit							
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)					
1	April 2022	2,114.40	406.36					
2	May 2022	2,206.91	424.13					
3	June 2022	2,680.82	515.21					
4	July 2022	2,412.98	463.74					
5	August 2022	2,370.93	455.66					
6	September 2022	2,132.99	409.93					
7	October 2022	1,818.37	349.46					
8	November 2022	1,941.50	373.13					
9	December 2022	2,021.23	388.45					
10	January 2023	1,655.78	318.22					
11	February 2023	1,366.30	262.57					
12	March 2023	2,007.55	385.82					
	TOTAL	24,729.77	4,752.69					
Note	Note:							



11. Summary of Actual Volume sold								
Current License period: June 2022 – March 2023								
	DCDO Contified	Other Schen	nes Certified	Conventional	Takal			
	RSPO Certified	ISCC	Others	Conventional	Total			
CPO (MT)	0	0	0	0	0			
PK (MT)	3,567.35	0	0	0	3,567.35			
Credits	22,000	0	0	0	22,000			
<b>Previous Lice</b>	ense period: April 2022	– May 2022						
CPO (MT)	0	0	0	0	0			
PK (MT)	697.58	0	0	0	697.58			
Credits	0	0	0	0	0			
Note: Convention	onal is RSPO certified materia	l but sold as non-RSP	Ю.					

11A. R	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 Teguh Sempurna – Pemantang Kernel Crushing Plant	TR-dafb8423-8c24	-	351.09				
2	PT Teguh Sempurna – Pemantang Kernel Crushing Plant	TR-21583004-091c	-	346.49				
3	PT Teguh Sempurna – Pemantang Kernel Crushing Plant	TR-87eca34a-303f	-	452.58				
4	PT Teguh Sempurna – Pemantang Kernel Crushing Plant	TR-d31cf197-1a06	-	107.87				
5	PT Teguh Sempurna – Pemantang Kernel Crushing Plant	TR-7a62c116-bf9f	-	27.16				
6	PT Teguh Sempurna – Pemantang Kernel Crushing Plant	TR-b2e25889-4071	-	500.71				
7	PT Teguh Sempurna – Pemantang Kernel Crushing Plant	TR-bc595040-dded	-	381.94				
8	PT Teguh Sempurna – Pemantang Kernel Crushing Plant	TR-dbbc1174-5246	-	119.59				
9	PT Teguh Sempurna – Pemantang Kernel Crushing Plant	TR-d6911924-c599	-	350.71				
10	PT Teguh Sempurna – Pemantang Kernel Crushing Plant	TR-fc84170d-cfdd	-	57.14				
11	PT Teguh Sempurna – Pemantang Kernel Crushing Plant	TR-f272fd45-d364		345.96				
12	PT Teguh Sempurna – Pemantang Kernel Crushing Plant	TR-ecaef697-2c84	-	401.43				



13	PT Teguh Sempurna – Pemantang Kernel Crushing Plant	TR-4511e69c-c1d1	-	42.74
14	PT Teguh Sempurna – Pemantang Kernel Crushing Plant	TR-5da49469-655c	-	451.24
15	PT Teguh Sempurna – Pemantang Kernel Crushing Plant	TR-e5f26184-a961	-	328.28
		TOTAL	-	4,264.93
Note:				

11B. Re	11B. Records of certified CPO & PK Sold under other schemes since the last audit (if any)						
No.	D. Buyers Name Scheme Name Certified CPO Sold (MT) Certified PK Sold (MT)						
-	-	-	-	-			
		-	-				
Note:							

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

11D. Records of Certified CPO Sold under RSPO Credits since the last audit (if any)						
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold			
1	Nestle SA	RSPO_PO1000001171	22,000			
TOTAL 22						
Note:						



12. Inde	12. Independent Smallholders Certified Tonnage (MT) / Volume									
		mated last ot Applica		Actual (Not Applicable)		Forecast (Not Applicable)				
Dhasa	Eligibility	MS A	MS B	Eligibility	MS A	MS B	Eligibility	MS A	MS B	
Phase	40%	70%	100%	40%	70%	100%	40%	70%	100%	
FFB			-			-			-	
IS-CSPO	-	-		-	-		-	-		
IS-CSPKO	-	-		-	-		-	-		
IS-CSPKE	-	-		-	-		-	-		
CSPK	-	-		-	-		-	-		

12A.	12A. Monthly Records of Certified CPO, PK & PKE (equivalent) produced since the last audit							
						Certified PKE (MT)		
-	-	-	-	-	-	-		
	TOTAL	-	-	-	-	-		
Note	Note:							

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

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



#### **Section 2: Assessment Process**

#### **Certification Body:**

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

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

#### 2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on **6 – 9 March 2023.** The audit programme is included as Section 2.3.

The approach to the audit was to treat 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 **25 March 2023**. The audit programs are included in Section 2.3.

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

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

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

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

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

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



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

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

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

Assessment Program								
Name (Mill / Supply Base)	Year 1 (Re-Certification 2)	Year 2 (ASA 2-1)	Year 3 (ASA 2-2)	Year 4 (ASA 2-3)	Year 5 (ASA 2-4)			
Sekunyir POM	X	X	Х	Χ	X			
Sekunyir Estate	X	X	Х	Х	X			
Seruyan Estate	X	X	Х	Х	Х			

Tentative Date of Next Visit: March 4, 2024 - March 7, 2024

**Total Number of Mandays: 11** 

#### 2.2 BSI Assessment Team

Name	Role	Competency
Imam Fakhrurozi (IF)	Team Leader	<b>Education:</b> Holds a bachelor's degree majoring in Agriculture Technology, Gadjah Mada University.
		<b>Work Experience:</b> 2 years working experience oil palm industry, as a sustainability and HSE officer. More than 7 years working experience as RSPO Auditor / Lead Auditor
		<b>Training attended:</b> 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, Endorsed RSPO SCCS Lead Auditor Course, RSPO Independent Smallholder (ISH) Standard Auditor Training and Endorsed RSPO Refresher Trainings.
		Language proficiency: Fluent in Bahasa Indonesia and English
		<b>Aspect covered in this audit:</b> Occupational Health and Safety, Environmental Impact, GHG verification
Pratama Agung Sedayu (PS)	Team Member	<b>Education:</b> Holds a bachelor's degree majoring Social Economic of Agriculture, University of Jenderal Soedirman.
		<b>Work Experience:</b> More than 12 years of practical auditing experience with several accredited Certification Bodies covering assessment against Organic programs, RSPO, FSC, Timber certification, ISO 9001, and ISO 14001. 2 years working experience as consultant on FSC and SVLK certification and independent verifier on BioCert, SDS under CAFÉ Practices program.
		<b>Training attended:</b> Completed the ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course, OHSAS 18001 Lead Auditor Course, Introductory Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation, ISPO Lead Auditor endorsed Course, Endorsed RSPO P&C Lead



		Auditor Course, Endorsed RSPO SCCS Lead Auditor Course, SMETA Requirements training, RSPO Independent Smallholder (ISH) Standard Auditor Training and Endorsed RSPO Refresher Trainings.  Language proficiency: Fluent in Bahasa Indonesia and English  Aspect covered in this audit: Best Practices of Agronomy and Mill including Supply Chain requirements, Economic Management Plan.
Yudwi Wisnu Rahmanto (YW)	Team Member	<b>Education:</b> Holds a Bachelor of Forestry with Silviculture, Faculty of Forestry, University of Gadjah Mada
		<b>Work Experience:</b> 7 months working experience in palm oil industry as Agronomy Field Assistant. More than 11 years working experience as sustainability auditor covering Sustainable Forest Management by FSC FM/COC Scheme, RSPO, ISPO, Coffee and Farmer Equity (C.A.F.E Practices) Starbucks, Organic Standard (EU, NOP, JAS) for Coffee Farmers and Organic Exchange for Textile
		<b>Training attended:</b> Completed Endorsed RSPO P&C Lead Auditor Training Course, RSPO NEXT, ISPO Auditor/Lead Auditor Course, RSPO P&C Social and Labour Standards and the Mechanics of Social Auditing Training, SMETA Requirements Training, ISO 9001:2008 Auditor/Lead Auditor Course, GIS-Basic Mapping and Spatial Analysis, Timber Legality Assurance System (SVLK), Verification Organization Training C.A.F.E Practices (Starbucks), UTZ Programme, High Conservation Value (HCV) Training, Sustainability Reporting Assurance Training, Introductory Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation, Endorsed RSPO Supply Chain Lead Auditor Training Course, RSPO Independent Smallholder (ISH) Standard Auditor Training and Endorsed RSPO Refresher Trainings.
		Language proficiency: Fluent in Bahasa Indonesia and English
		<b>Aspect covered in this audit:</b> Stakeholder Consultation (external), Social Aspect, Legal Requirements, land & legal issue, Policy, and commitment.
-	Peer Reviewer	Education:
		- Work Experience:
		Training attended:

#### **Accompanying Persons:**

Name	Role
-	-



#### 2.3 Assessment Plan

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

Date Tanggal	Time <i>Waktu</i>	Subjects Subyek / Aktifitas	IF	YW	PS
Monday, 06/03/2023	05.45 - 07.00	Flight Jakarta – Pangkalanbuun (NAM Air) Travel to Site Audit	√	√	√
	14.00 – 15.00	<ul> <li>Opening Meeting:         <ul> <li>Auditee presentation (Introduction of PIC, Profile of Certified Management Unit) // Presentasi Auditee (Perkenalan PIC, Profil Perusahaan)</li> </ul> </li> <li>Auditor Team presentation (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Transparency and Confidentiality Clarification) // Presentasi Tim Auditor (Perkenalan, Penjelasan Tujuan Audit, Ruang Lingkup Audit, Pembahasan Rencana Audit, Penentuan Sampel Audit, Penyampaian Transparansi dan Kerahasiaan)</li> </ul>	√	√	√
	15.00 - 17.00	<ul> <li>Sekunyir POM: Document review // Tinjauan dokumen: <ul> <li>Verification of Supply Chain Data // Verifikasi Data Rantai Pasok</li> <li>Review of Basic Information Data, Time bound plan, partial certification verification // Review Data Informasi Umum</li> <li>Data verification of RSPO P&amp;C (Best management practices Mill, OHS, EMS, Social and Labour) // Verifikasi data RSPO P&amp;C (Pengolahan dan Proses Pabrik, K3, Lingkungan, Sosial dan Tenaga Kerja)</li> </ul> </li> <li>Field Observation // Observasi Lapangan: <ul> <li>RSPO Supply Chain (FFB Receiving, Weighbridge), Hazardous &amp; Toxic Storage, Chemical Storage, Fire Control Simulation, Effluent Pond // RSPO Supply Chain (Penerimaan TBS, Jembatan Timbang), Gudang Limbah B3, Gudang Bahan Kimia, Simulasi Sarana Prasarana Pengendalian Kebakaran, Kolam IPAL.</li> <li>Processing Station (Fertilizer, Tippler, Press, Clarification, Ripple Mill), Power Station, Workshop // Stasiun Proses (Rebusan, Bantingan, Press, Klarifikasi, Ripple Mill), Ruang Genset, Bengkel.</li> </ul> </li> </ul>	√	✓	✓
Tuesday, 07/03/2023	08.00 - 12.00	<ul> <li>Sekunyir Estate</li> <li>Field Observation and Worker interview:</li> <li>Aspect to be verified // Aspek yang akan diverifikasi:</li> <li>Implementation of Legal aspect (boundaries, occupied land, disputes – if any) // Implementasi aspek legal (tata batas, lahan akupasi, sengketa lahan – jika ada)</li> </ul>	√		✓



Date	Time	Subjects	IF	YW	PS
Tanggal	Waktu	Subyek / Aktifitas			
		<ul> <li>Implementation of Agronomy Aspect (Harvesting &amp; Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application)</li></ul>			
	08.00 - 12.00	Stakeholder Consultation with interested and affected parties by phone // Konsultasi stakeholder dengan pihak berkepentingan dan terdampak melalui telepon  Dinas Lingkungan Hidup Kab. Kotawaringin Barat  Dinas Tenaga Kerja dan Transmigrasi Kab. Kotawaringin Barat  Dinas Perkebunan Kab. Kotawaringin Barat  Dinas Penanaman Modal dan Perijinan Terpadu Satu Pintu Kab. Kotawaringin Barat  Kantor Pertanahan Kab. Kotawaringin Barat  Kepala Desa, Ketua Koperasi, Tokoh Masyarakat, Kontraktor Angkut TBS.  Gender Committee  Worker Union  Sample of workers		√	
	12.00 - 14.00	Lunch Break // Istirahat dan Makan Siang	√	√	√
	14.00 - 16.30	Sekunyir Estate		v √	V √
	11.00 10.30	Document Review: Aspect to be verified // Aspek yang akan diverifikasi: Principle 1: Behave ethically and transparently Principle 2: Operate legally and respect rights	<b>v</b>	V	<b>v</b>



Date	Time	Subjects	IF	YW	PS
Tanggal	Waktu	Subyek / Aktifitas			
		Principle 3: Optimize productivity, efficiency, positive impact, and resilience Principle 4: Respect community and human rights and deliver benefit Principle 5: Support smallholder inclusion Principle 6: respect workers' rights and conditions Principle 7: Protect the environment, conserve biodiversity, and ensure sustainable management of natural resources	,		
	16.30 - 17.00	Wrap up meeting	√	√	√
Wednesday 08/03/2023	08.00 - 12.00	<ul> <li>Seruyan Estate</li> <li>Field Observation and Worker interview:</li> <li>Aspect to be verified // Aspek yang akan diverifikasi:</li> <li>Implementation of Legal aspect (boundaries, occupied land, disputes – if any) // Implementasi aspek legal (tata batas, lahan akupasi, sengketa lahan – jika ada)</li> <li>Implementation of Agronomy Aspect (Harvesting &amp; Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) // Implementasi Aspek Agronomi (Panen &amp; Transportasi, Pemupukan, Aplikasi Pestisida, Perawatan Jalan, Monitoring Pengendali Hayati, Aplikasi Janjang Kosong)</li> <li>Implementation of Environmental, Conservation and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management) // Implementasi Aspek Lingkungan, Konservasi dan Pengelolaan Limbah (Inspeksi Gudang Bahan Kimia, Pupuk, Gudang Limbah B3, Workshop, Fasilitas Pengendali Kebakaran, Pengelolaan Sampah dan Limbah)</li> <li>Implementation of Occupational Health &amp; Safety Aspect // Implementasi Keselamatan dan Kesehatan Kerja</li> <li>Implementation of Employment Procedure and Mechanism Aspect // Implementasi Prosedur dan mekanisme Aspek Ketenagakerjaan</li> <li>Observation of Workers Facilities (Housing, School, Worship Place) // Observasi Fasilitas Pekerja (Perumahan, Sekolah, Sarana Ibadah)</li> <li>Interview with Previous landowner (if applicable) // Wawancara dengan pemilik lahan sebelumnya (yang sudah di GRTT)</li> </ul>	<b>√</b>	✓	<b>✓</b>
	12.00 - 14.00	Lunch Break // Istirahat dan Makan Siang	<b>√</b>	√	<b>√</b>
	14.00 - 14.00			V √	
	14.00 - 10.30	Seruyan Estate  Document Review:  Aspect to be verified // Aspek yang akan diverifikasi:	V	V	V



Date	Time	Subjects	IF	YW	PS
Tanggal	Waktu	Subyek / Aktifitas			
		Principle 1: Behave ethically and transparently			
		Principle 2: Operate legally and respect rights			
		Principle 3: Optimize productivity, efficiency, positive impact, and resilience			
	Principle 4: Respect community and human rights and deliver benefit				
		Principle 5: Support smallholder inclusion			
		Principle 6: respect workers' rights and conditions			
		Principle 7: Protect the environment, conserve biodiversity, and ensure sustainable management of natural resources			
		Interview:		√	
		Gender Committee			
		New Mother			
		Worker Union			
		Sample of workers			
	16.30 - 17.00	Wrap up meeting	√	√	√
Thursday,	08.00 - 12.00	Sekunyir POM:	$\checkmark$	√	√
09/03/2023		Document review // Tinjauan dokumen:			
		Verification of Supply Chain Data // Verifikasi Data Rantai     Pasok			
		Review of Basic Information Data, Time bound plan, partial certification verification // Review Data Informasi Umum			
		<ul> <li>Data verification of RSPO P&amp;C (Best management practices Mill, OHS, EMS, Social and Labour) // Verifikasi data RSPO P&amp;C (Pengolahan dan Proses Pabrik, K3, Lingkungan, Sosial dan Tenaga Kerja)</li> </ul>			
	12.00 - 14.00	Lunch Break // Istirahat dan Makan Siang	√	√	√
	14.00 – 15.00	Document Review Finalization	√	√	<b>√</b>
	15.00 – 16.00	Report Preparation and Auditor Discussion	$\checkmark$	√	√
	16.00 - 17.00	Closing Meeting	√	√	√
		<ul> <li>Presentation of audit findings (Noteworthy Positive Component, Non-Conformities, OFI, Timeline of CAR's, Conclusion) // Penyampaian hasil audit (Catatan Komponen Positif, Ketidaksesuaian, OFI, Batas Waktu Perbaikan dan Kesimpulan)</li> </ul>			
		Comments, Responses and Questions // Komentar, Tanggapan dan Diskusi			
	17.00 – 19.00	Traveling to Pangkalanbuun	√	√	√
		Overnight at Pangkalanbuun			



#### **Audit Plan - NCR Close Out**

Date	Time	Subjects	IF
Saturday, 25 March 2023	08.00 - 08.30	Opening Meeting: Auditor Team presentation (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Transparency and Confidentiality Clarification	√
	08.30 - 11.30	Document Review Related to Major NC - RSPO P&C 2018 - INA NI 2020 - Indicator 3.8.8 Sales and Goods Out  Statement: The document for sales of CSPK from PT. Indotruba Tengah-Sekunyir POM does not indicate RSPO certificate number for the certification unit (RSPO 744702)  Objective findings:  Weighbridge ticket "Despatch" No.64102; for D/O No.00262/00255/02/23/L-ITH-KERNEL; Seller PT. Indotruba Tengah-Sekunyir Factory; Buyer PT. Teguh Sempurna; Product Palm Kernel; Quantity 14,320 kg; Truck No.KH8491FD; Delivery Date 03/03/2023; not indicate RSPO certificate number.  Weighbridge ticket "Despatch" No.064140; for D/O No.00262/00255/02/23/L-ITH-KERNEL; Seller PT. Indotruba Tengah-Sekunyir Factory; Buyer PT. Teguh Sempurna; Product Palm Kernel; Quantity 12,470 kg; Truck No.KH8991FB; Delivery Date 04/03/2023; not indicate RSPO certificate number.	√
	11.30 – 12.00	<ul> <li>Closing Meeting</li> <li>Presentation of Report of NCR</li> <li>Comments, Responses and Questions</li> </ul>	√



#### **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?	Yes. Timebound Plan of Sime Darby Plantation Berhad has included all its operating units in Malaysia, Indonesia, Papua New Guinea and Solomon Island. Refer to the Time Bound Plan table.  As of 16 January 2020, Sime Darby Plantation under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (SDP Liberia) to Mano Palm Oil Industries Ltd (MPOI): <a href="http://www.simedarbyplantation.com/media/press-releases/sime-darby-plantation-completes-divestment-of-its-liberia-operations">http://www.simedarby-plantation-completes-divestment-of-its-liberia-operations</a>	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	Generally, all estates and mills excepted stated below or in the TBP are certified with RSPO. Some units with exemption cases such as poor financial or sold as property development has been taken out from the certification unit. In Malaysia, Pekaka Mill is being mothballed and all the supply bases certified to it (Pekaka Estate; Ruai Estate, Dulang Estate, Paroh Estate & Chartquest Estate) has been transferred to SOU Lavang while for Bintang Oil Mill, Sime Darby Plantation Berhad acquired Bintang Palm Oil Mill in April 2017 but was sold on 01/10/2018.  In Indonesia, PT Mitral Austral Sejahtera (MAS) was sold and currently Sime Darby Plantation Berhad have no control in the management.  For the remaining uncertified units, as per reply from Deputy Director of Compliance, RSPO Secretariat on 26/01/2022, for RSPO membership date before 1st July 2018, the TBP for certification of all the uncertified units shall be before 30th June 2023. As of the audit date, the SDP TBP is within June 2023 and confirmed by the Sime Darby Representative that this plan is in progress. Hence, no approval is required from RSPO Secretariat.	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 are no new acquisitions as confirmed during the audit and the latest Timebound Plan.	Complied



Any deviations from the maximum periods requires approval by the RSPO Secretariat.	Although there are deviation has been identified at those Indonesia management units but it has been justified that these units are still awaiting to receive land titles/"Hak Guna Usaha (HGU)"	Complied
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required.  Is this consistent with the ACOP reporting?	Yes. Indonesia operation:  - PT. Swadaya Andika: Mill closed and all the supply bases was transferred to PT. Laguna Mandiri - Rantau POM. The operation of Selabak Estate, Randi Estate, Sangkoh Estate, Lanting Estate is currently under PT. Laguna Mandiri - Rantau POM certification.  - PT. Mitral Austral Sejahtera: The properties was sold and currently Sime Darby Plantation Berhad have no control in the management. The property was disposed on 25 June 2019 and an official letter on disposal of PT. Mitral Austral Sejahtera was sent to RSPO Secretariat on 27 June 2019.  Malaysia Operation:	Complied
	<ul> <li>Pekaka Mill is being mothballed in year 2018 and all the certified supply base Pekaka Estate, Ruai Estate, Dulang Estate, Paroh Estate &amp; Chartquest Estate has been transferred to SOU Lavang.</li> <li>Bintang Oil Mill: Sime Darby Plantation Berhad acquired Bintang Palm Oil Mill in April 2017 but was disposed on 1 October 2018.</li> </ul>	
	Papua New Guinea Operation:  - Markham Farming Company Limited (MFCL)/Markham Agro Pte. Ltd: The Remediation and Compensation Process is at the submission of Compensation Plan. RSPO Main Assessment is planned on 10-14 March 2020 as public Notification letter:  www.rspo.org/certification/publicannouncement	
	For Liberia operations:  As of 16 January 2020, Sime Darby Plantation Berhad under its unit Sime Darby Plantation Investment (Liberia) Pte Ltd has completed its disposal of its entire interest in Sime Darby Plantation (Liberia) Inc (Sime Darby Plantation Liberia) to Mano Palm Oil Industries Ltd (MPOI):	
	www.simedarbyplantation.com/media/pressreleases/sime-darby-plantation-completesdivestment-of-its-liberia-operations.  ACOP 2021 has been cross-referenced as below: https://rspo.org/members/1-0008-04-000-00/	



Have there been any isolated lapses in implementation of the plan? If yes a <b>Minor</b> non-compliance shall be raised  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 <b>Major</b> non-compliance shall be raised	Sime Darby Plantation Berhad    Note   Part   Part	Complied
<b>Un-Certified Units or Holdings</b>		
No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12.	Based on the time-bound plan, it was not identified that those uncertified units are due to RaCP. Mainly are due to awaiting to receive land titles at the Indonesia management units.	Complied
Any new plantings since January 1st 2010 shall comply with the RSPO New Plantings Procedure.	New plantings within Sime Darby Plantation Berhad that have completed NPP notification.  1. NBPOL (Poliamba Limited) 23 May 2020 – no comments  https://rspo.org/certification/new-plantingprocedure/public-consultations/sime-darbyplantation-berhad-nbpol-poliamba-limited  2. NBPOL (Guadalcanal Plain Palm Oil Ltd)  6 April 2018 – no comments  https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-a-subsidiary-of-sime-darby-plantationbhd-guadalcanal-plain-palm-oil-ltd  3. NBPOL (Ragu Agri Industries Limited)  29 January 2018 – no comments  https://rspo.org/certification/new-plantingprocedure/public-consultations/nbpol-ramuagri-industries-ltd  4. NBPOL (Ramu Agri Industries Limited)  2 September 2016 – no comments  https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-ltd-ramu-agri-industries-limited  5. NBPOL (Higaturu Oil Palms) 21 June 2016 – no comments  https://rspo.org/certification/new-plantingprocedure/public-consultations/new-plantingprocedure/public-consultations/new-plantingprocedure/public-consultations/new-plantingprocedure/public-consultations/new-	Complied



	buitainnalm ail ltd bigatum, ail nalma	
	britainpalm-oil-ltd-higaturu-oil-palms  6. NBPOL (Poliamba Limited – Lamawan)  7 April 2014 – no comments captured in RSPO Website	
	https://rspo.org/certification/new- plantingprocedure/public-consultations/nbpol- poliambalimited-lamawan-png	
	7. NBPOL (Poliamba Limited – Lamendauen)	
	7 April 2014 – no comments captured in RSPO Website https://rspo.org/certification/new-plantingprocedure/public-consultations/nbpol-poliambalimited-lamendauen-png 8. NBPOL (Roka Mini estate) 4 November 2013 – no	
	comments captured in RSPO website	
	https://rspo.org/certification/new-plantingprocedure/public-consultations/new-britainpalm-oil-ltdroka-mini-estate	
	9. NBPOL (J estate) 1 November 2013 – no comments	
	captured in RSPO website https://rspo.org/certification/new-	
	plantingprocedure/public-consultations/new- britainpalm-oil-ltdj-estate	
	10. NBPOL (Higaturu Oil Palm) 14 December 2012 – no	
	comments captured in RSPO website	
	https://rspo.org/certification/new- plantingprocedure/public-consultations/new- britainpalm-oil-limited-higaturu-oil-palm	
Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute	No land conflicts. Both Liberia and Indonesia (PT Mitral Austral Sejahtera) has been excluded in the latest TBP as both sites was disposed.	Complied
Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.	The RaCP tracker was checked. There are 21 Management units that have potential liabilities. There are some discrepancy between RaCP tracker and actual scenario due possibility of assets disposal. As per the data audited, there are 19 management units for the Indonesia Operations that requires LUCA. All LUCAs were submitted but the review was delayed due to change of RSPO reviewer. As of June 2023, 16 LUCAs review completed with remaining 8 concept note required, 6 concept note approved by RSPO,1 Concept note endorsed and 9 required Remediation plan.	
	As per Internal Audit conducted in 27 – 28/06/2022, 01 – 06/08/2022 and 23/10/2022, all issues of are being resolved through a mutually agreed process, such as the RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C.	



	Based on verification in the media (i.e internet and newspaper) it was confirmed that no news or issue related land disputed were raised by any parties.	
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	Sime Darby Plantation Berhad have published Grievance mechanism that is applied to all management units. Disputes related to labor, stakeholders and communities are to be dealt using this mechanism.  As per Internal Audit conducted in 27 – 28/06/2022, 01	Complied
	- 06/08/2022 and 23/10/2022, no labor dispute issues were reported.	
	Based on verification in the media (i.e internet and newspaper) it was confirmed that no news or issue related labour disputed were raised by any parties.	
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	Sime Darby Plantation maintain corporate governance to monitor and address any legal non-compliances. Through the published Code of Business Conduct and charters, the company is committed to delivery their business complying to the laws and regulations of the country.	Complied
	As per Internal Audit conducted in 27 – 28/06/2022, 01 – 06/08/2022 and 23/10/2022, the legal compliance is being addressed through measures consistent with the requirements of RSPO P&C.	
	Based on verification in the media (i.e internet and newspaper) it was confirmed that no news or issue related legal compliance were raised by any parties.	
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.	Yes. The sustainability unit has conducted internal audits the uncertified units and updated in the compliance status of uncertified management unit. There is no replacement of primary forest or HCV area and no new planting after January 1st 2010. The issue are mainly awaiting for Land Titles. The last audit was conducted on 27 – 28/06/2022, 01 – 06/08/2022 and 23/10/2022. The Head of Sustainability has concluded in the uncertified unit compliance report that there is no land disputes and legal compliance is monitored during the internal audit as the positive assurance.	Choose an item.
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?	No 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.	Complied
Have there been any stakeholder (including NGO) consultation conducted?	Respective sites maintained stakeholder engagements as part of the estates/mills operations especially in Indonesia, socialization of company	Complied



#### 3.2 Progress of scheme smallholders and/or outgrowers

Progress of scheme smallholders or outgrow	vers towards compliance with relevant	standards
Requirement	Remarks	Compliance
Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification?  OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years.	Not Applicable because no scheme smallholder as supply base of PT. Indotruba Tengah.	Complied



#### **Approved Time Bound Plan**

Name of the Unit of	Country	Name of the Mills and Supply Bases	Location Address	GPS Coo (in decima	rdinates al degree)	Total Managed	Certificati on Status	for	Actual Certification	Date of Last TBP	(On	REVISION C		de)
Certification (UoC)				Latitude	Longitude	Area (Ha)	(Certified / Not certified)	Certification	Year	Verified and Approved by CB	Any revision from the last approved TBP?	New Proposed Year for Certification	Justification of changes for each UoC	Date of approval from RSPO
Manggala	Indonesia	Manggala Mill	Rokan Hilir District	1.521111	100.727778		Certified	N/A	23-Nov-10	19-20 July	No	N/A	N/A	N/A
		Manggala -1 Estate	- Riau	1.535278	100.730000	4,919	Certified	N/A	23-Nov-10	2021	No	N/A	N/A	N/A
		Manggala -2 Estate		1.531667	100.643889	4,922	Certified	N/A	23-Nov-10		No	N/A	N/A	N/A
		Manggala -3 Estate		1.473056	100.758889	3,995	Certified	N/A	23-Nov-10		No	N/A	N/A	N/A
Alur Dumai	Indonesia	Alur Dumai Mill	Rokan Hilir District	1.561111	100.541667		Certified	N/A	16-Jan-12	19-20 July	No	N/A	N/A	N/A
		Alur Dumai Estate	- Riau	1.561111	100.541667	3,759	Certified	N/A	16-Jan-12	2021	No	N/A	N/A	N/A
Teluk Siak	Indonesia	Teluk Siak Mill	Siak District - Riau	0.591389	101.658889		Certified	N/A	11-Oct-11	19-20 July	No	N/A	N/A	N/A
		Teluk Siak Estate		0.585833	101.616944	3,321.20	Certified	N/A	11-Oct-11	2021	No	N/A	N/A	N/A
		Pinang Sebatang Estate		0.543056	101.575000	3,799.21	Certified	N/A	11-Oct-11		No	N/A	N/A	N/A
		Aneka Persada Estate		0.626389	101.655833	4,434.90	Certified	N/A	11-Oct-11		No	N/A	N/A	N/A
Blang Simpo	Indonesia	Blang Simpo Mill	Aceh Tamiang and	4.708333	97.840556		Certified	N/A	3-May-13	19-20 July	No	N/A	N/A	N/A
		Blang Simpo -1 Estate	East Aceh District – Nanggroe Aceh	4.696944	97.837222	3,460.06	Certified	N/A	3-May-13	2021	No	N/A	N/A	N/A
		Blang Simpo -2 Estate	Darussalam	4.685000	97.817500	2,677.83	Certified	N/A	3-May-13		No	N/A	N/A	N/A
		Tamiang (PT PPP) Estate		4.306667	98.026944	1,451.99	Certified	N/A	3-May-13		No	N/A	N/A	N/A
		Batang Ara (PT PSK) Estate		4.290000	98.013333	1,187.34	Certified	N/A	3-May-13		No	N/A	N/A	N/A
Teluk Bakau	Indonesia	Teluk Bakau Mill	Indragiri Hilir	0.256389	103.588889		Certified	N/A	11-Oct-11	19-20 July	No	N/A	N/A	N/A
		Teluk Bakau Estate	District - Riau	0.192500	103.596944	4,025.07	Certified	N/A	11-Oct-11	2021	No	N/A	N/A	N/A
		Nusa Lestari Estate		0.185278	103.568056	3,456.74	Certified	N/A	11-Oct-11		No	N/A	N/A	N/A
		Nusa Perkasa Estate		0.117222	103.605278	5,836.00	Certified	N/A	11-Oct-11		No	N/A	N/A	N/A

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Mandah	Indonesia	Mandah Mill	Indragiri Hilir	0.115833	103.549167		Certified	N/A	1-Apr-14	19-20 July	No	N/A	N/A	N/A
		Mandah Estate	District - Riau	0.135278	103.547500	5,053.18	Certified	N/A	1-Apr-14	2021	No	N/A	N/A	N/A
		Rotan Semelur Estate	_	0.117778	103.604722	7,313.00	Certified	N/A	1-Apr-14		No	N/A	N/A	N/A
Sungai Pinang	Indonesia	Sungai Pinang Mill	Musi Rawas District	-2.984722	103.405833		Certified	N/A	11-Sep-12	19-20 July	No	N/A	N/A	N/A
		Sungai Pinang Estate	- South Sumatera	-2.986944	103.406944	3,374.42	Certified	N/A	11-Sep-12	2021	No	N/A	N/A	N/A
		Sungai Pinang Estate		-2.986944	103.406944	Land legalisation process for 308.35 ha (Div 1 Bukit Pinang & Div 3 Sungai Pinang) still in process.		June 2023			No	N/A	N/A	N/A
		Bukit Pinang Estate		-2.987222	103.405556	3,138.58	Certified	N/A	11-Sep-12		No	N/A	N/A	N/A
		Bukit Pinang Estate		-2.987222	103.405556	Land legalisation process for 308.35 ha (Div 1 Bukit Pinang & Div 3 Sungai Pinang) still in process.	Certified	June 2023			No	N/A	N/A	N/A
Ladang	Indonesia	Ladang Panjang Mill	Muaro Jambi	-1.792500	103.793611		Certified	N/A	9-Jul-12	19-20 July	No	N/A	N/A	N/A
Panjang		Ladang Panjang Estate	District - Jambi	-1.794167	103.799444	1,202.04	Certified	N/A	9-Jul-12	2021	No	N/A	N/A	N/A
		Ladang Panjang Estate		-1.794167	103.799444	Total Areas of Div 1 and 2 (1,796.19 ha) HGU still in process.	Certified	June 2023			No	N/A	N/A	N/A
	Indonesia	Rantau Panjang Mill		-2.916389	103.747778		Certified	N/A	16-Mar-12		No	N/A	N/A	N/A

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Rantau		Rantau Panjang Estate	Musi Banyuasin	-2.922222	103.745278	2,679.74	Certified	N/A	16-Mar-12	19-20 July	No	N/A	N/A	N/A
Panjang		Bumi Ayu Estate	District - South Sumatera	-2.896944	103.676944	2,960.98	Certified	N/A	16-Mar-12	2021	No	N/A	N/A	N/A
		Karang Ringin Napal Estate	7	-2.859722	103.646944	4,359.74	Certified	N/A	16-Mar-12		No	N/A	N/A	N/A
		Mangun Jaya Estate	7	-2.853056	103.571111	139.45	Certified	N/A	16-Mar-12		No	N/A	N/A	N/A
		Sungai Jernih Estate		-2.979833	103.803500	851.57 ha under legalization process	Not Certified	June 2023			No	N/A	N/A	N/A
Angsana	Indonesia	Angsana Mill	Tanah Bumbu	-3.613611	115.610556		Certified	N/A	6-Jul-11	19-20 July	No	N/A	N/A	N/A
		Angsana Estate	District – South Kalimantan	-3.532222	115.669722	3,250.06	Certified	N/A	6-Jul-11	2021	No	N/A	N/A	N/A
		Gunung Sari Estate		-3.583056	115.687500	2,826.94	Certified	N/A	6-Jul-11		No	N/A	N/A	N/A
Mustika	Indonesia	Mustika Mill	Tanah Bumbu	-3.488611	115.738611		Certified	N/A	3-Jul-13	19-20 July	No	N/A	N/A	N/A
		Mustika Estate	District – South Kalimantan	-3.488889	115.716111	3.648.74	Certified	N/A	3-Jul-13	2021	No	N/A	N/A	N/A
		Pantai bonati Estate		-3.747500	115.577500	2,534.00	Certified	N/A	6-Jul-11		No	N/A	N/A	N/A
Gunung Aru	Indonesia	Gunung Aru Mill	Kotabaru District –	-3.613611	115.610556		Certified	N/A	5-Jul-11	19-20 July	No	N/A	N/A	N/A
		Gunung Aru Estate	South Kalimantan	-3.504167	116.163056	2,684.41	Certified	N/A	5-Jul-11	2021	No	N/A	N/A	N/A
		Gunung Kemasan Estate		-3.530000	116.183333	3,511.36	Certified	N/A	5-Jul-11		No	N/A	N/A	N/A
		Laut Timur Estate		-3.596944	116.205000	3,207.28	Certified	N/A	5-Jul-11		No	N/A	N/A	N/A
		Pantai Timur Estate		-3.606667	116.223889	3,337.49	Certified	N/A	5-Jul-11		No	N/A	N/A	N/A
Ungkaya	Indonesia	Ungkaya Mill	Morowali District –	-2.222778	121.563611		Certified	N/A	10-Jul-12	19-20 July	No	N/A	N/A	N/A
		Ungkaya Estate	Sulawesi Tengah	-2.222778	121.563611	4,145.00	Certified	N/A	10-Jul-12	2021	No	N/A	N/A	N/A
Rantau	Indonesia	Rantau Mill	Kotabaru District –	-2.439167	116.114167		Certified	N/A	30-Dec-11	19-20 July	No	N/A	N/A	N/A
		Rantau Estate	South Kalimantan	-2.445000	116.111944	4,638.00	Certified	N/A	30-Dec-11	2021	No	N/A	N/A	N/A
		Matalok Estate	7	-2.445556	116.111944	3,082.00	Certified	N/A	30-Dec-11		No	N/A	N/A	N/A
		Selabak Estate (PT SAA)	<del>-</del>	-2.442222	116.208056	3.757.67	Certified	N/A	16-Mar-12	1	No	N/A	N/A	N/A
		Randi Estate (PT SAA)	7	-2.438889	116.208611	2,882.98	Certified	N/A	16-Mar-12	1	No	N/A	N/A	N/A
		Sangkoh Estate (PT SAA)	7	-2.470556	116.237500	3,789.34	Certified	N/A	16-Mar-12		No	N/A	N/A	N/A



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		Lanting Estate (PT LMR)		-2.463611	116.283611	3,249.27	Certified	N/A	16-Mar-12		No	N/A	N/A	N/A
Betung	Indonesia	Betung Mill	Kotabaru District –	-2.378611	116.205000	-, -	Certified	N/A	1-Apr-14	19-20 July	No	N/A	N/A	N/A
J. J.		Betung Estate	South Kalimantan	-2.356667	116.195833	4,266.00	Certified	N/A	1-Apr-14	2021	No	N/A	N/A	N/A
		Sekayu Estate		-2.326111	116.182778	3,313.57	Certified	N/A	1-Apr-14	1	No	N/A	N/A	N/A
Bebunga	Indonesia	Bebunga Mill	Kotabaru District –	-2.373611	116.329722		Certified	N/A	16-Mar-12	19-20 July	No	N/A	N/A	N/A
J		Bebunga Estate	South Kalimantan	-2.383611	116.334444	3,958.43	Certified	N/A	16-Mar-12	2021	No	N/A	N/A	N/A
		Bakau Estate		-2.420556	116.328333	5,342.14	Certified	N/A	16-Mar-12	-	No	N/A	N/A	N/A
		Sungai Cengal Estate		-2.406111	116.363056	4,974.20	Certified	N/A	16-Mar-12	-	No	N/A	N/A	N/A
Pondok Labu	Indonesia	Pondok Labu Mill	Kotabaru District –	-2.459167	116.518889		Certified	N/A	16-Mar-12	19-20 July	No	N/A	N/A	N/A
		Pondok Labu Estate	South Kalimantan	-2.412500	116.510000	3,569.53	Certified	N/A	16-Mar-12	2021	No	N/A	N/A	N/A
		Binturung Estate		-2.440833	116.442222	4,072.01	Certified	N/A	16-Mar-12	1	No	N/A	N/A	N/A
		Rampa Estate		-2.452500	116.436389	3,656.20	Certified	N/A	16-Mar-12	1	No	N/A	N/A	N/A
		Sesulung Estate		-2.494444	116.510556	4,578.46	Certified	N/A	16-Mar-12	1	No	N/A	N/A	N/A
Sekunyir	Indonesia	Sekunyir Mill	Seruyan and West	-2.444722	112.006944		Certified	N/A	23-Nov-10	19-20 July	No	N/A	N/A	N/A
		Sekunyir Estate	Kotawaringin District – Central	-2.446667	112.008889	3,555.19	Certified	N/A	23-Nov-10	2021	No	N/A	N/A	N/A
		Seruyan Estate	Kalimantan	-2.407778	112.068056	4,179.40	Certified	N/A	23-Nov-10		No	N/A	N/A	N/A
Sukamandang	Indonesia	Sukamandang Mill	Seruyan and East	-2.057778	112.316944		Certified	N/A	5-Jul-11	19-20 July	No	N/A	N/A	N/A
		Sukamandang Estate	Kotawaringin District – Central	-2.065556	112.313333	3,936.56	Certified	N/A	5-Jul-11	2021	No	N/A	N/A	N/A
		Sapiri Estate	Kalimantan	-2.023889	112.347778	3,530.90	Certified	N/A	5-Jul-11		No	N/A	N/A	N/A
		Baras Danum Estate		-2.080000	112.381111	3,664.60	Certified	N/A	5-Jul-11		No	N/A	N/A	N/A
		Kuala Kuayan Estate		-2.079444	112.352778	3,647.86	Certified	N/A	5-Jul-11		No	N/A	N/A	N/A
Pemantang	Indonesia	Pemantang Mill	Seruyan and East	-2.148333	112.292778		Certified	N/A	5-Jul-11	19-20 July	No	N/A	N/A	N/A
		Pemantang Estate	Kotawaringin District – Central	-2.158056	112.290556	3,857.91	Certified	N/A	5-Jul-11	2021	No	N/A	N/A	N/A
		Kawan Batu Estate	Kalimantan	-2.161111	112.385278	4,400.00	Certified	N/A	5-Jul-11		No	N/A	N/A	N/A
		Hatantiring Estate		-2.116111	112.293333	3,811.00	Certified	N/A	5-Jul-11	]	No	N/A	N/A	N/A
		Batang Garing Estate		-2.157778	112.420833	4,532.75	Certified	N/A	5-Jul-11		No	N/A	N/A	N/A





Lembiru	Indonesia	Lembiru Mill	Ketapang District –	-2.168889	110.673889		Certified	N/A	3-Jul-14	19-20 July	No	N/A	N/A	N/A
		Lembiru Estate	West Kalimantan	-2.164722	110.687778	4,929.49	Certified	N/A	3-Jul-14	2021	No	N/A	N/A	N/A
		Awatan Estate		-2.215278	110.681944	3,476.79	Certified	N/A	3-Jul-14		No	N/A	N/A	N/A
		Pelanjau Estate (PT BAL)		-2.227778	110.621944	1,002.79	Certified	N/A	3-Jul-19		No	N/A	N/A	N/A
		Karya Palma Estate		-2.170592	110.726528	Pending confirmatio n from BPN on HGU document	Not Certified	2023			No	N/A	N/A	N/A
		Beturus Estate (PT BAL)		-2.174444	110.659722	HGU was obtained however BPN never release the HGU to the company	Not Certified	June 2023			No	N/A	N/A	N/A
Bukit Ajong	Indonesia	Bukit Ajong Mill	Sanggau District –	0.269444	110.482778		Certified	N/A	18-Oct-10	19-20 July	No	N/A	N/A	N/A
		West Estate	West Kalimantan	0.271667	110.405833	4,562.34	Certified	N/A	18-Oct-10	2021	No	N/A	N/A	N/A
		East Estate		0.256111	110.502500	2,665.48	Certified	N/A	18-Oct-10	=	No	N/A	N/A	N/A
		East/Sei Mawang Estate		0.155224	110.532656	Land legalization process for East Estate for 6123.7 ha under process	Not Certified	N/A			No	N/A	N/A	N/A
Sg. Dingin	Malaysia	Sungai Dingin Oil Mill	Karangan, Kedah	5.394734	100.710604		Certified	N/A	12-Aug-10	19-20 July	No	N/A	N/A	N/A
		Anak Kulim Estate		5.301731	100.589053	1,523.35	Certified	N/A	12-Aug-10	2021	No	N/A	N/A	N/A
		Sungai Dingin Estate		5.374539	100.723497	4,244.03	Certified	N/A	12-Aug-10		No	N/A	N/A	N/A
		Somme Estate		5.247043	100.624650	941.56	Certified	N/A	12-Aug-10		No	N/A	N/A	N/A
		Bukit Selarong Estate		5.505948	100.608351	3,896.17	Certified	N/A	12-Aug-10		No	N/A	N/A	N/A
		Padang Buluh Estate		5.673433	100.543599	4,008.47	Certified	N/A	12-Aug-10		No	N/A	N/A	N/A

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		Bukit Hijau Estate		5.600325	100.717128	2,725.00	Certified	N/A	12-Aug-10		No	N/A	N/A	N/A
		Jentayu Estate		5.772915	100.587191	2,178.59	Certified	N/A	12-Aug-10		No	N/A	N/A	N/A
Chersonese	Malaysia	Chersonese Oil Mill	Kuala Kurau, Perak	4.978457	100.461902		Certified	N/A	5-Oct-11	19-20 July	No	N/A	N/A	N/A
		Chersonese Estate		4.987886	100.456169	3,293.72	Certified	N/A	5-Oct-11	2021	No	N/A	N/A	N/A
		Kalumpong Estate		4.957656	100.566418	2,716.80	Certified	N/A	5-Oct-11		No	N/A	N/A	N/A
		Tali Ayer Estate		5.081477	100.523402	3,756.10	Certified	N/A	5-Oct-11		No	N/A	N/A	N/A
		Holyrood Estate		5.139587	100.712109	1,332.74	Certified	N/A	5-Oct-11		No	N/A	N/A	N/A
Elphil	Malaysia	Elphil Oil Mill	Sg Siput, Perak	4.890787	101.092768		Certified	N/A	18-Jun-11	19-20 July	No	N/A	N/A	N/A
		Kamuning Estate		4.850552	101.031803	3,888.43	Certified	N/A	18-Jun-11	2021	No	N/A	N/A	N/A
		Elphil Estate		4.848728	101.102094	1,865.43	Certified	N/A	18-Jun-11		No	N/A	N/A	N/A
		Kinta Kellas Estate		4.459869	101.087714	1,060.74	Certified	N/A	18-Jun-11		No	N/A	N/A	N/A
Flemington	Malaysia	Flemington Oil Mill	Teluk Intan, Perak	3.928662	100.856590		Certified	N/A	5-Oct-11	19-20 July	No	N/A	N/A	N/A
		Flemington Estate		3.901745	100.905976	1,906.84	Certified	N/A	5-Oct-11	2021	No	N/A	N/A	N/A
		Bagan Datoh Estate		3.987867	100.815889	3,781.86	Certified	N/A	5-Oct-11		No	N/A	N/A	N/A
		Sabak Bernam Estate		3.754999	101.014455	2,511.79	Certified	N/A	5-Oct-11		No	N/A	N/A	N/A
		Sg. Samak Estate		3.774142	101.158366	3,025.74	Certified	N/A	5-Oct-11		No	N/A	N/A	N/A
Seri	Malaysia	Seri Intan Oil Mill	Teluk Intan, Perak	3.969097	100.985458		Certified	N/A	3-Mar-11	19-20 July	No	N/A	N/A	N/A
Intan/Selaba		Selaba Oil Mill		3.989699	101.081201	1,549.75	Certified	N/A	3-Mar-11	2021	No	N/A	N/A	N/A
		Seri Intan (+ Selaba) Estate		3.962735	101.016490	4,013.16	Certified	N/A	3-Mar-11		No	N/A	N/A	N/A
		Sabrang Estate		4.011192	100.960478	3,945.23	Certified	N/A	3-Mar-11		No	N/A	N/A	N/A
		Sogomana Estate		4.387616	100.701262	2,214.08	Certified	N/A	3-Mar-11		No	N/A	N/A	N/A
		Sg. Wangi Estate		4.280812	100.743135	2,226.66	Certified	N/A	3-Mar-11		No	N/A	N/A	N/A
		Bikam Estate		4.017065	101.317302	2,075.16	Certified	N/A	3-Mar-11	1	No	N/A	N/A	N/A
		Cluny (+ Bedford) Estate		3.857921	101.434059	1,549.75	Certified	N/A	3-Mar-11	]	No	N/A	N/A	N/A
Tennamaram	Malaysia	Tennamaram Oil Mill		3.396501	101.418491		Certified	N/A	3-Mar-11		No	N/A	N/A	N/A

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		Tennamaram Estate	Bestari Jaya,	3.413960	101.416127	1,981.60	Certified	N/A	3-Mar-11	19-20 July	No	N/A	N/A	N/A
		Sungai Buluh Estate	Selangor	3.318358	101.327095	5,152.22	Certified	N/A	3-Mar-11	2021	No	N/A	N/A	N/A
		Bukit Talang Estate		3.401577	101.303102	3,572.44	Certified	N/A	3-Mar-11		No	N/A	N/A	N/A
Bkt Kerayong	Malaysia	Bukit Kerayong Oil Mill	Kapar, Selangor	3.188046	101.372775		Certified	N/A	15-Apr-11	19-20 July	No	N/A	N/A	N/A
		Bukit Kerayong Estate		3.165246	101.371079	2,699.28	Certified	N/A	15-Apr-11	2021	No	N/A	N/A	N/A
		Bukit Cheraka Estate		3.223053	101.357632	3,647.62	Certified	N/A	15-Apr-11		No	N/A	N/A	N/A
East	Malaysia	East Oil Mill	Carey Island,	2.885355	101.436495		Certified	N/A	19-May-10	19-20 July	No	N/A	N/A	N/A
		East Estate	Selangor	2.894306	101.402747	5,634.45	Certified	N/A	19-May-10	2021	No	N/A	N/A	N/A
		Sepang Estate	Sepang, Selangor	2.692067	101.723500	2,092.28	Certified	N/A	19-May-10		No	N/A	N/A	N/A
		Dusun Durian Estate	Kuala Selangor, Selangor	2.810648	101.495017	3,176.21	Certified	N/A	19-May-10		No	N/A	N/A	N/A
West	Malaysia	West Oil Mill	Carey Island,	2.905704	101.360380		Certified	N/A	19-May-10	19-20 July	No	N/A	N/A	N/A
		West Estate	Selangor	2.867693	101.338941	5,912.69	Certified	N/A	19-May-10	2021	No	N/A	N/A	N/A
Bukit Puteri	Malaysia	Bukit Puteri Oil Mill	Raub, Pahang	4.201447	101.862680		Certified	N/A	7-Jul-11	19-20 July	No	N/A	N/A	N/A
		Bukit Puteri Estate		4.188357	101.864388	3,875.80	Certified	N/A	7-Jul-11	2021	No	N/A	N/A	N/A
Kerdau	Malaysia	Kerdau Oil Mill	Temerloh, Pahang	3.569692	102.278807		Certified	N/A	7-Jul-11	19-20 July	No	N/A	N/A	N/A
		Kerdau Estate		3.582726	102.314266	5,683.04	Certified	N/A	7-Jul-11	2021	No	N/A	N/A	N/A
		Mentakab Estate		3.488212	102.243800	3,266.49	Certified	N/A	7-Jul-11		No	N/A	N/A	N/A
		Chenor Estate		3.784343	102.615444	2,834.98	Certified	N/A	7-Jul-11		No	N/A	N/A	N/A
		Sg Mai Estate		3.847749	102.341727	1,996.99	Certified	N/A	7-Jul-11		No	N/A	N/A	N/A
Jabor	Malaysia	Jabor Oil Mill	Kuantan, Pahang	3.960000	103.310000		Certified	N/A	7-Jul-11	19-20 July	No	N/A	N/A	N/A
		Jabor Estate		3.958168	103.299484	2,332.92	Certified	N/A	7-Jul-11	2021	No	N/A	N/A	N/A
Labu	Malaysia	Labu Oil Mill	Nilai, Negeri	2.750730	101.805038		Certified	N/A	30-Dec-11	19-20 July	No	N/A	N/A	N/A
		Labu Estate	Sembilan	2.737380	101.816051	4,529.72	Certified	N/A	30-Dec-11	2021	No	N/A	N/A	N/A
Tanah Merah	Malaysia	Tanah Merah Oil Mill	Port Dickson,	2.654368	101.792488		Certified	N/A	19-May-10	19-20 July	No	N/A	N/A	N/A
		Tanah Merah Estate	Negeri Sembilan	2.634776	101.798120	4,341.73	Certified	N/A	19-May-10	2021	No	N/A	N/A	N/A



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	_													
		Bukit Pelandok Estate		2.690570	101.773393	1,862.14	Certified	N/A	19-May-10		No	N/A	N/A	N/A
Sua Betong	Malaysia	Sua Betong Oil Mill	Port Dickson,	n, 2.529158	101.894873		Certified	N/A	18-Feb-14	19-20 July	No	N/A	N/A	N/A
		Sua Betong Estate	Negeri Sembilan	2.503423	101.919182	2,870.75	Certified	N/A	18-Feb-14	2021	No	N/A	N/A	N/A
		Sengkang Estate		2.447583	101.962703	2,831.51	Certified	N/A	18-Feb-14		No	N/A	N/A	N/A
		Bradwall Estate	]	2.564010	101.938966	3,828.34	Certified	N/A	18-Feb-14		No	N/A	N/A	N/A
		PD Lukut Estate		2.535525	101.850486	1,523.79	Certified	N/A	18-Feb-14		No	N/A	N/A	N/A
		Tampin Linggi Estate	]	2.523442	101.995888	2,106.71	Certified	N/A	18-Feb-14		No	N/A	N/A	N/A
		Sg. Bahru Estate	]	2.439865	102.084904	1,427.31	Certified	N/A	18-Feb-14		No	N/A	N/A	N/A
		Salak Estate	]	2.572851	101.884647	3,868.86	Certified	N/A	18-Feb-14		No	N/A	N/A	N/A
Kok Foh	Malaysia	Kok Foh Oil Mill	Bahau, Nego	eri 2.784092	102.507537		Certified	N/A	7-Jul-11	19-20 July	No	N/A	N/A	N/A
		Muar River Estate	Sembilan -	2.592059	102.740421	1,584.62	Certified	N/A	7-Jul-11	2021	No	N/A	N/A	N/A
		Sg. Senarut Estate + Sg Gemas Estate		2.556845	102.691147	2,958.38	Certified	N/A	7-Jul-11		No	N/A	N/A	N/A
		Kok Foh Estate		2.818025	102.516297	2,275.84	Certified	N/A	7-Jul-11		No	N/A	N/A	N/A
		Bukit Pilah Estate		2.718295	102.527980	3,667.31	Certified	N/A	7-Jul-11		No	N/A	N/A	N/A
		St. Helier Estate		2.779462	102.374345	1,992.65	Certified	N/A	7-Jul-11		No	N/A	N/A	N/A
		Sungai Sabaling Estate		2.844046	102.474445	1,321.35	Certified	N/A	7-Jul-11		No	N/A	N/A	N/A
		Pertang Estate	]	2.969102	102.244214	1,052.49	Certified	N/A	7-Jul-11		No	N/A	N/A	N/A
Kempas	Malaysia	Kempas Oil Mill	Jasin, Melaka	2.243408	102.481607		Certified	N/A	20-May-10	19-20 July	No	N/A	N/A	N/A
		Kempas Estate		2.207737	102.441483	4,505.45	Certified	N/A	20-May-10	2021	No	N/A	N/A	N/A
		Tangkah Estate		2.292917	102.602549	2,537.78	Certified	N/A	20-May-10		No	N/A	N/A	N/A
		Kemuning Estate	]	2.431024	102.297339	2,671.05	Certified	N/A	20-May-10		No	N/A	N/A	N/A
		Serkam Estate		2.250557	102.394318	2,114.23	Certified	N/A	20-May-10	1	No	N/A	N/A	N/A
Diamond	Malaysia	Diamond Jubilee Palm Oil Mill	Jasin, Melaka	2.324247	102.482843		Certified	N/A	5-Oct-11	19-20 July	No	N/A	N/A	N/A
Jubilee		Diamond Jubilee Estate		2.307499	102.439884	2,836.19	Certified	N/A	5-Oct-11	2021	No	N/A	N/A	N/A
		Bukit Asahan Estate	]	2.417485	102.550615	3,072.18	Certified	N/A	5-Oct-11		No	N/A	N/A	N/A



		Welch Estate		2.459303	102.656758	1,447.82	Certified	N/A	5-Oct-11		No	N/A	N/A	N/A
Pagoh	Malaysia	Pagoh Oil Mill	Muar, Johor	2.077708	102.719062		Certified	N/A	28-Jan-14	19-20 July	No	N/A	N/A	N/A
		Pagoh Estate		2.078652	102.700463	2,325.93	Certified	N/A	28-Jan-14	2021	No	N/A	N/A	N/A
		Lanadron Estate		2.199715	102.744380	1,964.44	Certified	N/A	28-Jan-14		No	N/A	N/A	N/A
		Pengkalan Bukit Estate		2.126414	102.772148	3,128.22	Certified	N/A	28-Jan-14	-	No	N/A	N/A	N/A
Chaah	Malaysia	Chaah Oil Mill	Chaah, Johor	2.148569	102.973809		Certified	N/A	18-Nov-10	19-20 July	No	N/A	N/A	N/A
		Chaah Estate		2.148681	102.975656	2,795.36	Certified	N/A	18-Nov-10	2021	No	N/A	N/A	N/A
		Sg. Simpang Kiri Estate		2.117737	102.990732	2,371.66	Certified	N/A	18-Nov-10	-	No	N/A	N/A	N/A
		North Labis Estate		2.383325	103.024507	3,532.91	Certified	N/A	18-Nov-10	-	No	N/A	N/A	N/A
Gunung Mas	Malaysia	Gunung Mas Oil Mill	Kluang, Johor	2.243769	103.138027		Certified	N/A	19-May-10	19-20 July	No	N/A	N/A	N/A
		Gunung Mas Estate		2.256176	103.128691	3,466.17	Certified	N/A	19-May-10	2021	No	N/A	N/A	N/A
		Kempas Klebang Estate		2.217905	103.160775	2,473.06	Certified	N/A	19-May-10		No	N/A	N/A	N/A
		Bukit Paloh Estate		2.155149	103.180279	3,390.90	Certified	N/A	19-May-10		No	N/A	N/A	N/A
		Yong Peng Estate		2.063715	103.119119	2,975.41	Certified	N/A	19-May-10		No	N/A	N/A	N/A
Bukit Benut	Malaysia	Bukit Benut Oil Mill	Kluang, Johor	1.931143	103.347365		Certified	N/A	5-Oct-11	19-20 July 2021	No	N/A	N/A	N/A
		Bukit Benut Estate		1.910217	103.336262	2,799.78	Certified	N/A	5-Oct-11		No	N/A	N/A	N/A
		Lambak Elaeis Estate		1.965476	103.319840	3,740.16	Certified	N/A	5-Oct-11		No	N/A	N/A	N/A
		CEP Nyior Estate		2.090638	103.248932	1,955.19	Certified	N/A	5-Oct-11		Yes	change of certified supply base from one certified mill to another		

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													reported in the next update, as SDP is now awaiting final report by CB.	
Ulu Remis	Malaysia	Ulu Remis Oil Mill	Layang-layang,	1.834433	103.462750		Certified	N/A	11-Apr-11	19-20 July	No	N/A	N/A	N/A
		Ulu Remis Estate	Johor	1.842329	103.479604	2,598.25	Certified	N/A	11-Apr-11	2021	No	N/A	N/A	N/A
		Cenas Estate		1.926143	103.580014	1,974.06	Certified	N/A	11-Apr-11		No	N/A	N/A	N/A
		Bukit Badak Estate		1.873353	103.506986	3,234.25	Certified	N/A	11-Apr-11		No	N/A	N/A	N/A
		Tun Dr. Ismail Estate		1.832710	103.359779	4,271.44	Certified	N/A	11-Apr-11		No	N/A	N/A	N/A
		Pekan Estate		1.846603	103.583208	3,258.70	Certified	N/A	11-Apr-11		No	N/A	N/A	N/A
		Sembrong Estate		1.878696	103.459400	1,778.88	Certified	N/A	11-Apr-11		No	N/A	N/A	N/A
Hadapan	Malaysia	Hadapan Oil Mill	Layang-layang,	1.762310	103.448013		Certified	N/A	29-Mar-11	19-20 July	No	N/A	N/A	N/A
		Sri Pulai Estate	Johor	1.617621	103.493465	2,049.87	Certified	N/A	29-Mar-11	2021	No	N/A	N/A	N/A
		Kulai Estate		1.661084	103.570639	3,023.42	Certified	N/A	29-Mar-11		No	N/A	N/A	N/A
		Layang Estate		1.788781	103.451095	3,258.90	Certified	N/A	29-Mar-11		No	N/A	N/A	N/A
		CEP Renggam Estate		1.874883	103.377487	3,039.63	Certified	N/A	29-Mar-11		No	N/A	N/A	N/A
Sandakan Bay	Malaysia	Sandakan Bay Oil Mill	Sandakan, Sabah	5.640834	118.166631		Certified	N/A	1-Oct-08	19-20 July	No	N/A	N/A	N/A
		Tun Tan Siew Sin Estate		5.649754	118.188772	3,125.60	Certified	N/A	1-Oct-08	2021	No	N/A	N/A	N/A
		Tunku Estate		5.695778	118.205194	3,199.05	Certified	N/A	1-Oct-08		No	N/A	N/A	N/A
		Tigowis Estate		5.745396	118.216785	2,074.02	Certified	N/A	1-Oct-08		No	N/A	N/A	N/A
		Sentosa Estate		5.599561	118.178923	3,545.54	Certified	N/A	1-Oct-08		No	N/A	N/A	N/A
		Segaliud Estate		5.707622	117.753884	4,820.13	Certified	N/A	1-Oct-08		No	N/A	N/A	N/A
Melalap	Malaysia	Melalap Oil Mill	Tenom, Sabah	5.233156	115.986648		Certified	N/A	21-Jan-11	19-20 July	No	N/A	N/A	N/A
		Melalap Estate		5.223404	115.992040	2,096.73	Certified	N/A	21-Jan-11	2021	No	N/A	N/A	N/A
		Sapong Estate		5.045466	115.930091	3,149.45	Certified	N/A	21-Jan-11	]	No	N/A	N/A	N/A
Binuang	Malaysia	Binuang Oil Mill	Kunak, Sabah	4.704700	118.060210		Certified	N/A	16-Jan-09		No	N/A	N/A	N/A



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			1	T	1							1		1
		Binuang Estate		4.687893	118.049997	3,271.08	Certified	N/A	16-Jan-09	19-20 July 2021	No	N/A	N/A	N/A
		Sungang Estate		4.658950	118.121355	3,407.98	Certified	N/A	16-Jan-09	2021	No	N/A	N/A	N/A
		Tingkayu Estate		4.716962	118.077638	1,881.08	Certified	N/A	16-Jan-09		No	N/A	N/A	N/A
		Jeleta Bumi Estate		4.709414	117.977971	3,099.44	Certified	N/A	16-Jan-09		No	N/A	N/A	N/A
Giram	Malaysia	Giram Oil Mill	Kunak, Sabah	4.586585	118.193448		Certified	N/A	16-Jan-09	19-20 July	No	N/A	N/A	N/A
		Giram Estate		4.575846	118.206571	4,166.98	Certified	N/A	16-Jan-09	2021	No	N/A	N/A	N/A
		Mostyn Estate		4.670009	118.169029	4,178.04	Certified	N/A	16-Jan-09	] [	No	N/A	N/A	N/A
Merotai	Malaysia	Merotai Oil Mill	Tawau, Sabah	4.373961	117.808354		Certified	N/A	16-Jan-09	19-20 July	No	N/A	N/A	N/A
		Merotai Estate		4.390278	117.808586	3,052.66	Certified	N/A	16-Jan-09	2021	No	N/A	N/A	N/A
		Imam Estate		4.341017	117.894636	3,773.56	Certified	N/A	16-Jan-09	-	No	N/A	N/A	N/A
		Tiger Estate		4.409715	117.840613	2,497.86	Certified	N/A	16-Jan-09		No	N/A	N/A	N/A
		Table Estate		4.365974	117.868354	2,221.63	Certified	N/A	16-Jan-09		No	N/A	N/A	N/A
Lavang	Malaysia	Lavang Oil Mill	Bintulu, Sarawak	3.431669	113.598862		Certified	N/A	30-Dec-11	19-20 July	No	N/A	N/A	N/A
		Lavang Estate		3.427129	113.586935	4,363.83	Certified	N/A	30-Dec-11	2021	No	N/A	N/A	N/A
		Rasan Estate		3.405057	113.635653	3,454.00	Certified	N/A	30-Dec-11		No	N/A	N/A	N/A
		Belian Estate		3.369111	113.560310	2,847.00	Certified	N/A	30-Dec-11		No	N/A	N/A	N/A
		Kelida Estate		3.364892	113.624465	2,460.00	Certified	N/A	30-Dec-11		No	N/A	N/A	N/A
		Lavang (Special) Estate		3.400634	113.593633	included under Lavang Estate Ha	Certified	N/A	30-Dec-11		No	N/A	N/A	N/A
		Pekaka Estate		3.481090	113.641821	2,626.14	Certified	N/A	30-Dec-11		No	N/A	N/A	N/A
		Ruai Estate		3.449198	113.624477	2,460.96	Certified	N/A	30-Dec-11		No	N/A	N/A	N/A
		Dulang Estate		3.460195	113.677984	2,548.00	Certified	N/A	30-Dec-11	]	No	N/A	N/A	N/A
		Charquest Estate		3.490618	113.602270	1,448.71	Certified	N/A	30-Dec-11	]	No	N/A	N/A	N/A
		Paroh Estate		3.463913	113.734106	2,627.90	Certified	N/A	30-Dec-11	]	No	N/A	N/A	N/A
Rajawali	Malaysia	Rajawali Oil Mill	Bintulu, Sarawak	3.373177	113.400308		Certified	N/A	30-Dec-11		No	N/A	N/A	N/A



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		Rajawali Estate		3.394716	113.426263	6,087.27	Certified	N/A	30-Dec-11	19-20 July	No	N/A	N/A	N/A
		Samudera Estate		3.502793	113.412122	3,308.60	Certified	N/A	30-Dec-11	2021	No	N/A	N/A	N/A
		Semarak Estate		3.373453	113.375595	2,248.68	Certified	N/A	30-Dec-11		No	N/A	N/A	N/A
		Bayu Estate		3.503470	113.374145	2,459.90	Certified	N/A	30-Dec-11	1	No	N/A	N/A	N/A
Derawan	Malaysia	Derawan Oil Mill	Bintulu, Sarawak	3.390463	113.348888		Certified	N/A	30-Dec-11	19-20 July	No	N/A	N/A	N/A
		Derawan Estate		3.412304	113.359221	2,490.79	Certified	N/A	30-Dec-11	2021	No	N/A	N/A	N/A
		Sahua Estate		3.462224	113.366926	2,644.00	Certified	N/A	30-Dec-11	1	No	N/A	N/A	N/A
		Takau Estate		3.387069	113.329626	2,107.00	Certified	N/A	30-Dec-11	1	No	N/A	N/A	N/A
		Damai Estate		3.440639	113.400749	2,287.04	Certified	N/A	30-Dec-11	1	No	N/A	N/A	N/A
Guadalcanal	Solomon	Tetere Oil Mill	Guadalcanal	9.442703	160.219366		Certified	N/A	18-Mar-11	19-20 July	No	N/A	N/A	N/A
Plains Palm Oil Limited	Islands	Tetere Estate	Province, Solomon Islands	9.449012	160.218796	2947.79	Certified	N/A	18-Mar-11	2021	No	N/A	N/A	N/A
(GPPOL)		Ngalimbiu Estate		9.463400	160.146900	2498.65	Certified	N/A	18-Mar-11		No	N/A	N/A	N/A
		Mbalisuna Estate		9.447400	160.255700	2868.47	Certified	N/A	18-Mar-11		No	N/A	N/A	N/A
		Smallholders – West Zone (83)		9.450278	160.140000	245.50	Certified	N/A	18-Mar-11		No	N/A	N/A	N/A
		Smallholders – Central Zone (53)		9.460000	160.210000	181.71	Certified	N/A	18-Mar-11		No	N/A	N/A	N/A
		Smallholders – MBA East Zone (59)		9.468056	160.253889	180.80	Certified	N/A	18-Mar-11		No	N/A	N/A	N/A
		Smallholders – MBE East Zone (37)		9.484167	160.322222	102.77	Certified	N/A	18-Mar-11		No	N/A	N/A	N/A
	Papua New	Hagita Oil Mill	Milne Bay Province,	-10.315730	150.286230		Certified	N/A	15-Feb-13	19-20 July	No	N/A	N/A	N/A
Estates (MBE)	Guinea	Giligili Estate	Papua New Guinea	-10.300140	150.358360	1095.47	Certified	N/A	15-Feb-13	2021	No	N/A	N/A	N/A
		Hagita Estate		-10.310940	150.281030	2450.02	Certified	N/A	15-Feb-13		No	N/A	N/A	N/A
		Waigani Estate		-10.309390	150.259640	2341.13	Certified	N/A	15-Feb-13		No	N/A	N/A	N/A
		Sagarai Estate		-10.432860	150.190920	2864.55	Certified	N/A	15-Feb-13		No	N/A	N/A	N/A
		Padipadi Estate		-10.405080	150.024360	4517.67	Certified	N/A	15-Feb-13		No	N/A	N/A	N/A
		Mariawatte Estate	]	-10.405080	149.892330	1680.14	Certified	N/A	15-Feb-13		No	N/A	N/A	N/A



		Smallholders - East Gurney Estate (259)		From - 10.327640 to - 10.290530	From 150.284940 to 150.389560	450.59	Certified	N/A	15-Feb-13		No	N/A	N/A	N/A
		Smallholders - West Gurney Estate (231)		From - 10.307500 to - 10.408060	From 150.284940 to 150.664940	479.13	Certified	N/A	15-Feb-13		No	N/A	N/A	N/A
		Smallholders - East Sagarai Estate (156)		From - 10.431250 to - 10.290530	From 150.269220 to 150.300220	283.93	Certified	N/A	15-Feb-13		No	N/A	N/A	N/A
		Smallholders - West Sagarai Estate (212)		From - 10.450830 to - 10.405810	From 150.047890 to 150.047890	345.96	Certified	N/A	15-Feb-13		No	N/A	N/A	N/A
Poliamba	Papua New	Poliamba Oil Mill	New Ireland	-2.874720	151.276389		Certified	N/A	19-Mar-12	19-20 July	No	N/A	N/A	N/A
(POL)	Guinea	Kara Estate	_	From - 2.706390 to -2.811000	From 151.028330 to 151.184972	1032.10	Certified	N/A	19-Mar-12	2021	No	N/A	N/A	N/A
		Nalik Estate		From - 2.8705500 to -2.9325000	From 151.214990 to 151.429720	2666.75	Certified	N/A	19-Mar-12		No	N/A	N/A	N/A
		West Coast Estate		From - 2.813720 to -2.982200	From 151.214990 to 151.292970	627.60	Certified	N/A	19-Mar-12		No	N/A	N/A	N/A
		Noatsi Estate		From - 2.960550 to -3.109720	From 151.456390 to 151.705280	2064.10	Certified	N/A	19-Mar-12		No	N/A	N/A	N/A
		Madak Estate		From - 3.143060 to -3.259720	From 151.755830 to 152.041100	1517.11	Certified	N/A	19-Mar-12		No	N/A	N/A	N/A



		Smallholders -North Division (615)		From - 2.68390 to -2.88000	From 150.95000 to 150.25660	1022.12	Certified	N/A	19-Mar-12		No	N/A	N/A	N/A
		Smallholders- South Division (866)		From - 2.871100 to -3.188060	From 151.286110 to 151.835500	1257.21	Certified	N/A	19-Mar-12		No	N/A	N/A	N/A
		Smallholders -West Division (309)		from - 2.809440 to -2.992770	From 151.028330 to 151.345270	533.54	Certified	N/A	19-Mar-12		No	N/A	N/A	N/A
Ramu Agricultrual	Papua New	Gusap Mill	Morobe Province, Papua New Guinea	-6.088989	145.006104		Certified	N/A	5-Aug-10	19-20 July 2021	No	N/A	N/A	N/A
Industries Ltd	Guinea	Gusap East (Gusap) Estate	Papua New Guinea	-6.088556	146.006000	2856.45	Certified	N/A	5-Aug-10	2021	No	N/A	N/A	N/A
(RAIL)		Gusap West (Paddox) Estate		-6.049400	145.993900	3019.09	Certified	N/A	5-Aug-10		No	N/A	N/A	N/A
		Surinam Estate		-5.900300	145.783600	2154.14	Certified	N/A	5-Aug-10		No	N/A	N/A	N/A
		Dumpu Estate		-5.855700	145.730400	2254.36	Certified	N/A	5-Aug-10		No	N/A	N/A	N/A
		Ngaru Estate		-6.139300	146.623100	854.33	Certified	N/A	5-Aug-10		No	N/A	N/A	N/A
		J Estate (Jephcott) Estate		-6.056200	145.933000	2824.01	Certified	N/A	5-Aug-10		No	N/A	N/A	N/A
		Smallholders - Madang VOPs (71)		-5.462500	145.344600	360.00	Certified	N/A	5-Aug-10		No	N/A	N/A	N/A
		Smallholders - Morobe VOPs (253)		-6.762000	146.130400	283.70	Certified	N/A	5-Aug-10		No	N/A	N/A	N/A
Higaturu Oil	Papua New	Sangara Oil Mill	Oro Bay Province,	-8.743400	148.198700		Certified	N/A	1-Feb-13	19-20 July	No	N/A	N/A	N/A
Palm (HOP)	Guinea	Mamba Oil Mill	Papua New Guinea	-8.854700	147.707000		Certified	N/A	1-Feb-13	2021	No	N/A	N/A	N/A
		Embi Estate		-8.850600	148.429200	1737.78	Certified	N/A	1-Feb-13		No	N/A	N/A	N/A
		Ambogo Estate		-8.712500	148.233600	2040.00	Certified	N/A	1-Feb-13		No	N/A	N/A	N/A
		Sangara Estate		-8.742800	148.181700	1780.00	Certified	N/A	1-Feb-13		No	N/A	N/A	N/A
		Sumbiripa Estate		-8.751700	148.963100	2545.00	Certified	N/A	1-Feb-13		No	N/A	N/A	N/A
		Mamba Estate		-8.848100	147.715000	4013.10	Certified	N/A	1-Feb-13		No	N/A	N/A	N/A

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		Sambogo Estate		-8.799700	148.340000	2637.85	Certified	N/A	1-Feb-13		No	N/A	N/A	N/A
		Scheme Smallholder Sorov	_  i	-8.758600	148.312800	3940.21	Certified	N/A	1-Feb-13	-	No	N/A	N/A	N/A
		Division (2019)												
		Scheme Smallholder Saiho Division (842)		-8.847500	148.050800	1493.06	Certified	N/A	1-Feb-13		No	N/A	N/A	N/A
		Scheme Smallholder Aeka Division (911)	1	-8.673900	148.017800	1474.23	Certified	N/A	1-Feb-13		No	N/A	N/A	N/A
		Scheme Smallholder Igora Division (1367)	1	-8.717500	148.135000	2940.15	Certified	N/A	1-Feb-13		No	N/A	N/A	N/A
		Scheme Smallholder Ilimo Division (671)	)	-8.893600	147.857800	1063.66	Certified	N/A	1-Feb-13		No	N/A	N/A	N/A
West New	Papua New	Mosa Oil Mill	Kimbe, West New	5.622481	150.245278		Certified	N/A	10-Sep-08	19-20 July	No	N/A	N/A	N/A
Britain (WNB)	Guinea	Kumbango Oil Mill	Britain, Papua New Guinea	5.591944	150.211944		Certified	N/A	10-Sep-08	2021	No	N/A	N/A	N/A
		Kapiura Mill		5.623611	150.684167		Certified	N/A	10-Sep-08	] [	No	N/A	N/A	N/A
		Numundo Mill		5.233333	150.033611		Certified	N/A	10-Sep-08		No	N/A	N/A	N/A
		Waraston Mill		5.483889	150.086667		Certified	N/A	10-Sep-08		No	N/A	N/A	N/A
		Bebere Estate		5.614081	150.251000	2226.71	Certified	N/A	10-Sep-08		No	N/A	N/A	N/A
		Kumbango Estate		5.605300	150.196950	2610.80	Certified	N/A	10-Sep-08		No	N/A	N/A	N/A
		Togulo Estate		5.667369	150.186389	1509.20	Certified	N/A	10-Sep-08		No	N/A	N/A	N/A
		Dami Estate		5.514181	150.452058	1507.00	Certified	N/A	10-Sep-08		No	N/A	N/A	N/A
		Waisisi Estate		5.512966	150.454435	1090.00	Certified	N/A	10-Sep-08		No	N/A	N/A	N/A
		Kautu Estate		5.521269	150.055125	4280.60	Certified	N/A	10-Sep-08		No	N/A	N/A	N/A
		Karausu Estate		5.520800	150.752600	2387.64	Certified	N/A	10-Sep-08	] [	No	N/A	N/A	N/A
		Moroa Estate		5.520962	150.752590	848.16	Certified	N/A	10-Sep-08	] [	No	N/A	N/A	N/A
		Bilomi Estate		5.617497	150.677997	2011.70	Certified	N/A	10-Sep-08	] [	No	N/A	N/A	N/A
		Loata Estate		5.653739	150.666787	562.00	Certified	N/A	10-Sep-08	] [	No	N/A	N/A	N/A
		Haella Estate		5.521269	150.048760	4220.30	Certified	N/A	10-Sep-08	] [	No	N/A	N/A	N/A
		Garu Estate		5.512894	149.992978	3709.60	Certified	N/A	10-Sep-08	] [	No	N/A	N/A	N/A

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## RSPO P&C Public Summary Report Revision 14 (Aug 2022)

		Daliavu Estate		5.569761	150.022617	2484.10	Certified	N/A	10-Sep-08		No	N/A	N/A	N/A
		Sapuri Estate		5.569761	149.992978	2180.90	Certified	N/A	10-Sep-08		No	N/A	N/A	N/A
		Malilimi Estate		5.657400	150.441497	3837.00	Certified	N/A	10-Sep-08		No	N/A	N/A	N/A
		Rigula Estate		5.619300	150.792100	3720.00	Certified	N/A	10-Sep-08		No	N/A	N/A	N/A
		Nomundo Estate		5.499700	150.086600	2645.17	Certified	N/A	10-Sep-08		No	N/A	N/A	N/A
		Navarai / Karato ME /KDC EU Estate		5.359989	150.035939	1103.77	Certified	N/A	10-Sep-08		No	N/A	N/A	N/A
		Volupai / Lotomgam / Natupi / Goruru Estate		5.264997	150.009500	1992.59	Certified	N/A	10-Sep-08		No	N/A	N/A	N/A
		Lolokoru Estate		5.114500	150.058797	2453.10	Certified	N/A	10-Sep-08		No	N/A	N/A	N/A
		Ove Estate		5.580100	149.694400	3541.00	Certified	N/A	10-Sep-08		No	N/A	N/A	N/A
		Tamare Estate		5.625800	149.735300	1362.70	Certified	N/A	10-Sep-08		No	N/A	N/A	N/A
		Smallholders LSS Mosa (1822)		5.594119	150.226439	5008.53	Certified	N/A	10-Sep-08		No	N/A	N/A	N/A
		Smallholders VOP East (1817)		5.469011	150.452478	5324.37	Certified	N/A	10-Sep-08		No	N/A	N/A	N/A
		Smallholders VOP Central (1964)		5.593700	150.310900	5756.57	Certified	N/A	10-Sep-08		No	N/A	N/A	N/A
		Smallholders VOP West (1279)		5.280369	150.006219	2804.10	Certified	N/A	10-Sep-08		No	N/A	N/A	N/A
		Smallholders LSS Kapiura (551)		5.556645	150.850221	551.00	Certified	N/A	10-Sep-08		No	N/A	N/A	N/A
		Smallholders VOP Kapiura (850)		5.548892	150.868508	847.00	Certified	N/A	10-Sep-08		No	N/A	N/A	N/A
		Smallholders Kaulong/Akami/Pushiki/Repami ra/Sakapei (20)		5.650939	150.022897	700.37	Certified	N/A	10-Sep-08		No	N/A	N/A	N/A
Markham Farming Company Limited (MFCL)/Markh am Agro Pte. Ltd.	Papua New Guinea	Erap Mill	Markham Farms	-6.580870	146.642220		Certified	N/A	27-Mar-20	19-20 July 2021			There is total area for NPP: 710.30 ha which is currently excluded from the certification scope of MFCL	

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										until the NPP is approved.	
	Munum Estate	-6.542150	146.816230	1734.57	Certified	N/A	27-Mar-20	No	N/A	N/A	N/A
	Maralumi Estate	-6.542150	146.674450	2427.15	Certified	N/A	27-Mar-20	No	N/A	N/A	N/A
	Erap Estate	-6.573910	146.648240	1237.68	Certified	N/A	27-Mar-20	No	N/A	N/A	N/A



#### 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) Critical; PT Indotruba Tengah – Sekunyir Palm Oil Mill 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 #	2319871-202303-M1	Issued Date	9 March 2023			
Due Date	8 <sup>th</sup> June 2023	Closure Date	25 <sup>th</sup> March 2023			
Indicator & Category (Critical / Minor)	Indicator 3.8.8 Sales and G	oods Out (critical)				
Statement of Nonconformity:		CSPK from PT. Indotruba Te e number for the certification				
Requirement Reference:  The supplying mill shall ensure that the following minimum information for certified products is made available in document form. The information shall complete and can be presented either on a single document or across a rare documents issued for RSPO certified oil palm products (for example, denotes, shipping documents and specification documentation):						
	e) RSPO certificate numb f) A description of the (Identity Preserved or g) The quantity of the pr	s of the seller; ent / delivery date; e documents were issued; per; product, including the applic Mass Balance or the approve				
	<ul><li>h) Any related transport</li><li>i) A unique identification</li></ul>	•				
Objective Evidence:	<ul> <li>Objective findings:</li> <li>Weighbridge ticket "Despatch" No.64102; for D/O No.00262/0025 ITH-KERNEL; Seller PT. Indotruba Tengah-Sekunyir Factory; Buyer Sempurna; Product Palm Kernel; Quantity 14,320 kg; Truck No.I Delivery Date 03/03/2023; not indicate RSPO certificate number.</li> <li>Weighbridge ticket "Despatch" No.064140; for D/O No.00262/0025 ITH-KERNEL; Seller PT. Indotruba Tengah-Sekunyir Factory; Buyer Sempurna; Product Palm Kernel; Quantity 12,470 kg; Truck No.I Delivery Date 04/03/2023; not indicate RSPO certificate number.</li> </ul>					



Corrections:	Mill Manager Sekunyir Factory and SQM have coordinated with the IT Department for the inclusion of the RSPO Certificate Number on each weigh ticket by system so that when the weigh ticket is printed, the RSPO Certificate Number can be printed automatically.
Root Cause Analysis:	Management of Sekunyir Factory and SQM lack coordination with the IT Department regarding the inclusion of the RSPO Certificate Number for PT. ITH in Weigh tickets for CPO & PK sales.
Corrective Actions:	<ul> <li>Head Office IT (Jakarta) has included the RSPO Certificate Number on each weighing ticket automatically,</li> <li>Mill and SQM will conduct Periodic Monitoring once a month,</li> <li>Internal audits will be carried out intensively and periodically to ensure that Corrections are carried out effectively,</li> <li>Ensure the PIC related to SCCS at Mill (Mill Manager, Kasie Sekunyir POM and Weighbridge Operator) is competent and understands all SCCS requirements.</li> </ul>
	<ul> <li>Data verified:</li> <li>Record on Monthly Monitoring to ensure indicate RSPO certificate number for the certification unit (RSPO 744702) as per "Monitoring Bulanan Pencantuman Nomor Sertifikat RSPO", example Month March 2023. Status completed.</li> <li>Refreshment training related to RSPO SCC requirement dated 10<sup>th</sup> March 2023.</li> </ul>
	The training was delivered by SQM Department that was attended by Mill Manager, Kasie Sekunyir POM and Weighbridge Operator. Record seen: Attendance list and Training Material.  Internal audits report dated 9th March 2023, the special aspect to ensure indicate. PSPO partification with (PSPO 744702)
	<ul> <li>indicate RSPO certificate number for the certification unit (RSPO 744702).</li> <li>Record seen: Internal audit report and the followed-up report</li> <li>Management Review Report dated 10<sup>th</sup> March 2023. Special agenda to ensure indicate RSPO certificate number for the certification unit (RSPO 744702), that was attended by Chairman of SOU for PT Indotruba Tengah.</li> </ul>
	<ul> <li>Weighbridge ticket "Despatch" No.64222; for DO:00268.00256/03/23/L-ITH-KERNEL; Seller PT. Indotruba Tengah-Sekunyir Factory; Buyer PT. Teguh Sempurna; Product Palm CPO; Quantity 14,030 kg; Truck No.KH8491FD; Delivery Date 33/03/2023; has completed with indicate RSPO certificate number for the certification unit (RSPO 744702)</li> </ul>
	<ul> <li>Weighbridge ticket "Despatch" No.064151; for D/O No.00263/00256/03/23/L-ITH-KERNEL; Seller PT. Indotruba Tengah-Sekunyir Factory; Buyer PT. Teguh Sempurna; Product Palm Kernel; Quantity 13,540 kg; Truck No.KH8991FB; Delivery Date 21/03/2023; indicate RSPO certificate number for the certification unit (RSPO 744702)</li> </ul>
Assessment Conclusion:	Based on the evidence of the improvements shown above in corrections and corrective actions, they can be followed up effectively. Discrepancies related to Indicator 3.8.8 Sales and Goods Out have been able to be closed as of 25 <sup>th</sup> March 2023.



Opport	Opportunity for Improvements							
OFI#	Description							
OFI 1	-							

Positive Findings								
PF#	Description							
PF 1	Working instruction at Sekunyir Factory Workshop is available in combining between words description and pictures. This is making it easier to understand for particular parties, such as illiterate parties.  PT Indotruba Tengah - Sekunyir POM's team has demonstrated the commitment on implementation the RSPO P&C requirement during Annual Surveillance Assessment 1_1-year 2023							

#### 3.3.1 Status of Nonconformities Previously Identified and Observations

Non-conformity									
NCR Ref #	2189761-202204-M1	16 April 2022							
Due Date	15 July 2022	Closure Date	12 May 2022						
Indicator & Category (Critical / Minor)	RSPO P&C 2018 - INA NI 202 Major/Critical	0 Indicator 2.3.1							
Statement of Nonconformity:	Certificate Holder cannot den proof of ownership status, rig		•						
Requirement Reference:	<ul> <li>Information regarding the</li> <li>Proof of ownership status</li> <li>If relevant, valid planting/</li> </ul>	<ul> <li>Proof of ownership status, right/claim of the land by grower/smallholder;</li> </ul>							
Objective Evidence:	from PT. Indotruba Timur  - Sampled "Surat Penganta for delivery 644 bunches."  - Sampled Weighbridge tick  - Certificate Holder show Responsible Sourcing Guncher Sekunyir Factory No.SQN reviewing the readiness of planting year (before and peat area, national park, forest); social aspect (intrax issues). The report	ompany PT. Indotruba Timur ecord "Statistik Produksi SKF' r Buah dan Berondolan No.01	received 590.17 MT FFB 269/SPB/I/ITR-X/04/2022 222 for 7,395 kg FFB. 25 cpared report "Laporan PT. Indotruba Timur to anuary 2022. The report rom PT. Indotruba Timur: aspect (location against ed forest and production ce); financial aspect (i.e. ecause no peat area in						



	forest in the concession, "Pelepasan Kawasan Hutan of 1,164.75 Ha" in 13 May
	<ul> <li>2019.</li> <li>Certificate Holder demonstrates operating license PT. Indotruba Timur: "Keputusan Bupati Seruyan No.188.45/343/2019 tentang Izin Usaha Perkebunan untuk Budidaya (IUP-B) atas nama PT. Indotruba Timur" dated 21 August 2019 for plantation of 1,253.8 Ha.</li> </ul>
	No proof of ownership status, right/claim of the land by grower - guidance stipulates evidence of right of the land: Land Certificate/Customary Land Certificate/Ownership Certificate, Land-Use Rights (HGU) or other ownership evidence (that are recognizable) from the authority.
Corrections:	PIC Legal Minamas (PSD) will request HGU document/process to obtain HGU to management of PT. Indotruba Timur and send it to CB. Evidence received: Letter "PT. Indotruba Timur No. B/014/ITR/UM/GR/VI/2021 to Deputi Bidang Survei Pengukuran dan Pemetaan Up. Direktur Penetapan Batas Bidang dan Direktur Survei dan Penetapan Tematik" stating the company is applying for "Pengukuran kadastral atas lahan seluas 1,003 Ha di Desa Pembuang Hulu II, Kecamatan Hanau, Kabupaten Seruyan, Provinsi Kalimantan Tengah" — survey planning for land of 1,003 Ha in Pembuang Hulu II village, Hanau District, Seruyan Regency, Kalimantan Tengah Province, letter dated 16 June 2021.
Root Cause Analysis:	Team Legal Minamas has not obtain HGU document/process to obtain HGU from PT. Indotruba Timur (FFB supplier).
Corrective Actions:	Team Legal PT. Indotruba Tengah will conduct effective monitoring through the document "List Dokumen Legal" and all information required including the compliance level in periodic manner: once per year, 3 months from external audit - at the latest.  Evidence reviewed "List Dokumen Legal PT. Indotruba Timur" dated 25 April 2022
	indicating review upon "SK Penetapan Kawasan Hutan" - forest area determination; "Izin Usaha Perkebunan" - Plantation Business Permit; "Nomor Induk Berusaha/NIB" - Business Registration; "Hak Guna Usaha/HGU" - Land Title; "Permohonan Pengajuan HGU" - land title application process/progress.
Assessment Conclusion:	The team in unit and HO implement the correction and corrective action. Verification on correction through documented process/correspondence from FFB supplier to government evident. Corrective action verified through monitoring evident. Critical/Major NC closed out effectively.
<b>Effectiveness Closure</b>	This NC was closed on 12 May 2022
(for previous audit closed Critical NC):	Updated review during ASA 2_1-year 2023:
diosca circical ivoji	PT. Indotruba Tengah – Sekunyir POM mainly received and process FFB coming from company-owned estate, Sekunyir Estate and Seruyan Estate.
	• Information regarding geolocation of FFB origins was like palm oil mill details (under same company) see Section 1.
	Proof of ownership (under same company) land title see 2.1.1.
	Business license (under same company) of Business permit as in document of "Surat Pendaftaran Usaha Perkebun (SPUP) No. 700/Menhutbun-VII/200" dated 2020.
	List Dokumen Legal PT. Indotruba Timur, period 25 January 2023 whereby report the update on supplier's effort to obtain legal ownership of the plantation. indicating review upon "SK Penetapan Kawasan Hutan" - forest area determination; "Izin



	Usaha Perkebunan" - Plantation Business Permit; "Nomor Induk Berusaha/NIB" - Business Registration; "Hak Guna Usaha/HGU" - Land Title; "Permohonan Pengajuan HGU" - land title application process/progress.										
	Based on the evidence of the improvements shown above in corrections and corrective actions, they can be followed up effectively.										
Non-conformity											
NCR Ref #	2189761-202204-M2										
Due Date	15 July 2022		Closure Date		12 May 2022						
Indicator & Category (Critical / Minor)	RSPO P&C 201 Major/Critical	8 - INA NI 202	0 Indicator 3.8.7								
Statement of Nonconformity:			ot been able to demor production of certifie		evidence regarding inform ge.						
Requirement Reference:	<ul> <li>Purchasing and Goods In</li> <li>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</li> <li>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</li> <li>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</li> </ul>										
Objective Evidence:	Based on Palm below:  Product	PalmTrace (License per	volume and Mill processor certified volume riod 23 Nov 2019 – Mei 2022)	Actual onsite	I production since last assessment until this tification assessment						
	FFD	_	MT		MT						
	FFB CSPO		11,275		298,928.58						
	CSPK		<u>29,055</u> 5,635		67,752.88 13,339.19						
	<ul> <li>Therefore, there has been overproduction of FFB, CSPO and CSPK up to the time of this recertification assessment.</li> <li>Email from the company to CB on 7 January 2022 regarding request of volume extension for FFB of 11,842 MT; CSPO of 5,971 MT; and CSPK of 1,267 MT.</li> <li>Email from the company to CB on 12 April 2022 regarding request of volume extension for FFB of 24,713 MT; CSPO of 5,988 MT; and CSPK of 1,119 MT.</li> </ul>										
Corrections:	PT. Indotruba Tengah - Sekunyir POM sent email requesting volume extension application to CB per 15 April 2022. RSPO approved on 21 April 2022. Data in PalmTrace during verification: FFB Estates 301,526 MT; CSPO 72,119 MT; CSPK 14,125 MT.										
Root Cause Analysis:	production/ove	erproduction d	nducting monitori uring the license pe ion due to projected	riod ca	fectively the actual using issue in informing duction.						



Corrective Actions:	<ul> <li>PT. Indotruba Tengah and the Head Office was revising document "Mekanisme Koordinasi Monitoring Stock Penjualan CPO &amp; PK antara Dept. PSQM &amp; Dept. GTM Jakarta" dated 26 April 2022. Section 2 stated "Dept. PSQM coordinating with Dept. GTM Jakarta related to RSPO certified product being produced and being sold in platform IT PalmTrace every 6 months via email".</li> <li>Refresh training to team in PT. Indotruba Tengah-Sekunyir POM on new mechanism and agreed format in coordination with Dept. GTM Jakarta, dated 26 April 2022.</li> <li>Update the production database "Statistik Produksi Sekunyir Factory January - April 2022". Actual FFB production October 2019-March 2022: 298,034.41-ton FFB</li> </ul>						
Assessment Conclusion:	The team in unit and HO implement the correction and corrective action. Verification on correction through documented request for volume extension evident and approved by RSPO Secretariat. Corrective action verified through provision of training, revision of monitoring mechanism and agreed monitoring document evident.  Critical/Major NC closed out effectively.						
Effectiveness Closure (for previous audit closed Critical NC):	This NC was closed on 12 May 2022 Updated review during ASA 2_1-year 2023: Based on PalmTrace certified volume and Mill production statistic, obtained data below – there was no overproduction data:						
	Product  PalmTrace certified volume (license period May 2022-April 2023)  Actual production since last recertification assessment (Statistic SKF)						
	MT MT 125 909 00 102 057 22						
		FFB 125,898.00 102,957.23					
		CSPO 29,271.28 22,477.17					
	CSPK	6,294.00	4,253.44				
	Based on the evidence of the improvements shown above in corrections and corrective actions, they can be followed up effectively.						

Non-conformity				
NCR Ref #	2189761-202204-N1	Issued Date	16 April 2022	
Due Date	ASA 2-1 Closure Date 9 March 2023			
Indicator & Category (Critical / Minor)	RSPO P&C 2018 - INA NI 2020 Indicator 3.2.2 Minor			
Statement of Nonconformity:	Unit of certification has submitted RSPO Metric Template to CB during this recertification assessment, however there are discrepancies between data in RSPO Metric Template against data in "Statistik Produksi SKF".			



Requirement Reference:	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.				
Objective Evidence:	Based on review to RSPO Metric Template and data "Statistik Produksi SKF", obtained data below:				
	RSPO Metric Template "Statistik Produksi SKF"				
	Product	MT	MT		
	Period Jan-De	ec 2021			
	СРО	25,523.84	24,077.68		
	PK	4,693.06	4,632.099		
	Period Mar 20	21-Feb 2022			
	СРО	24,799.85	23,647.037		
	PK	7,693.92	4,556.651		
		ance of CPO and PK production in both 2021-February 2022.	oth period, January-December		
Corrections:	PIC (Staff SQM) revise the metric template data and erase opening stock data - to be consistent with "Statistik Produksi Sekunyir Factory" data.				
Root Cause Analysis:	PIC took data for metric template based on "Statistik Produksi Sekunyir POM" with additional opening stock data in early year 2022.				
<b>Corrective Actions:</b>	- To provide refresh training.				
	- During each end of monthly period data as required by RSPO Metric Template, Staff SQM in unit will monitor actual CPO and PK production in coordination with Sekunyir POM staff. The data will be input into RSPO Metric Template in accordance to period required.				
Assessment Conclusion:	The team in unit and HO implement the correction and corrective action. Verification on correction through documented request for volume extension evident and approved by RSPO Secretariat. Corrective action verified through provision of training, revision of monitoring mechanism and agreed monitoring document evident.  Minor NC closed out effectively.				
Effectiveness Closure (for previous audit closed Critical NC):	N/A for Minor NC.				

Non-conformity					
NCR Ref #	# 2189761-202204-N2 <b>Issued Date</b> 16 April 2022				
Due DateASA 2-1Closure Date9 March 2023					
Indicator & Category (Critical / Minor)	RSPO P&C 2018 - INA NI 2020 Indicator 6.1.4				



	Minor		
Statement of Nonconformity:	The unit of certification cannot demonstrate pregnant women are not discriminated in the recruitment procedure, by giving alternative opportunity in the position that not harmful for the reproduction organ (and/or the fetus).		
Requirement Reference:	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.		
Objective Evidence:	In the SOP of Employee Recruitment (No. 394/ITH-SOP-26/11 dated 5 January 2022) Clause 5.3, stipulates " dan jika perempuan tidak dalam masa hamil." – if female worker, not pregnant.		
Corrections:	PIC has coordinated with SQM staff to review the content of SOP Recruitment and the specific discriminatory sentence has been erase/revised.		
Root Cause Analysis:	PIC controlling the SOP Perekrutan Karyawan (KTU/KaSie) has not review the content of the SOP compared to the P&C Standard.		
Corrective Actions:	<ul> <li>Provide refresh training to PIC document.</li> <li>PIC document SOP (SQM and KTU/KaSie) will review and monitors SOP issued and monitor onsite minimum once per year to higlight and identify changes in regulation/standard.</li> </ul>		
Assessment Conclusion:	Corrective action verified through provision of training, revision of monitoring mechanism and agreed monitoring document evident.  Verification on 8 March 2023:  Documented evidence of revised procedure regarding Employee Recruitment in scope of PT Indotruba Tengah (394/ITH-SOP-26/11, Rev.01, dated 23 January 2023). Corrective statement on Clause 5.3 that acceptance of prospective workforce is minimum 18 y.o. and maximum 40 y.o.  Documented evidence of refreshment training to PIC document dated 20 January 2023 attended by 7 participants (2 document control, 2 payroll clerks, office assistant, sustainability, and Sekunyir Estate Manager). Context of refreshment training related revising of procedure on recruitment process.  Minor NC closed out effectively.		
Effectiveness Closure (for previous audit closed Critical NC):	N/A for Minor NC.		

Non-conformity				
NCR Ref #	2189761-202204-N3	Issued Date	16 April 2022	
Due Date	ASA 2-1 Closure Date 9 March 2023			
Indicator & Category (Critical / Minor)	RSPO P&C 2018 - INA NI 2020 Indicator 7.3.2 Minor			
Statement of Nonconformity:	Based on field visit to Sekunyir Estate Landfill, disposal of waste material was not according to waste management procedure "SOP Pengelolaan Limbah B3 & Bukan B3" dated 10 January 2022.			



Requirement Reference:	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.		
<b>Objective Evidence:</b>	Based on field visit to Sekunyir Estate Landfill, block C07, it was found:		
	The domestic waste and other waste category were piled up; and not put into landfill		
	• Found hazardous waste from Manthene and Kencepat (a.i. Acephate) bags in the waste pile;		
Corrections:	Select and collect back all hazardous was mixed in landfill and stored in licensed hazardous waste storage.		
	Re-arrange and tidying up landfill as per procedure.		
Root Cause Analysis:	The worker has not understood the waste handling process, post trunk injection treatment; and do not treat Kencepat 75 SP as hazardous waste.		
Corrective Actions:	<ul> <li>Perform refresh training for PIC landfill.</li> <li>PIC for landfill perform periodic control to ensure hazardous waste does not mixed up with other type of waste dedicated for landfill.</li> </ul>		
Assessment Conclusion:	Corrective action verified through provision of training, revision of monitoring mechanism and agreed monitoring document evident.  Minor NC closed out effectively.		
Effectiveness Closure (for previous audit closed Critical NC):	N/A for Minor NC.		

Opport	tunity for Improvement
OFI#	Description
OFI 1	OFI Statement:  RSPO P&C 2018 - INA NI 2020 Indicator 4.3.1  The unit of certification developed Annual CSR Program 2022 and has documented the CSR Implementation of 2021. Certificate Holder expected program related community economic development inclusion and CSR program dissemination to wider stakeholders.
	Verification / Follow-up actions: Please see at the indicator in checklist.
OFI 2	OFI Statement:  RSPO P&C 2018 - INA NI 2020 Indicator 6.2.7  Sekunyir Estate has appointed all temporary (PKWT) harvester as permanent workers (PKWTT/SKU).  For Seruyan Estate, the appointment of temporary (PKWT) harvester as permanent workers is under process. Consistent and aligned harvester recruitment (as core work) directly refers to the procedure of recruitment of permanent worker (SOP of Employee Recruitment No. 394/ITH-SOP-26/11 dated 5 January 2022).
	Verification / Follow-up actions:



	Please see at the indicator in checklist.
OFI 3	OFI Statement:
	RSPO P&C 2018 - INA NI 2020 Indicator 6.7.2
	Certificate Holder demonstrated SOP related to occupational health and safety; HIRADC for Sekunyir POM review and updated 10 January 2022; HIRADC for Sekunyir Estate and Seruyan Estate review and updated 10 January 2022; SOP for Emergency No.73PSQM-ESH/13 available; Expected consistency communicating safety briefing for visitor.
	Verification / Follow-up actions:
	Please see at the indicator in checklist.

#### 3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
2189761-202204-M1	Critical	RSPO P&C 2018 - INA NI 2020 Indicator 2.3.1	16 April 2022	Closed on 12 May 2022
2189761-202204-M2	Critical	RSPO P&C 2018 - INA NI 2020 Indicator 3.8.7	16 April 2022	Closed on 12 May 2022
2189761-202204-N1	Minor	RSPO P&C 2018 - INA NI 2020 Indicator 3.2.2	16 April 2022	Closed on 9 March 2023
2189761-202204-N2	Minor	RSPO P&C 2018 - INA NI 2020 Indicator 6.1.4	16 April 2022	Closed on 9 March 2023
2189761-202204-N3	Minor	RSPO P&C 2018 - INA NI 2020 Indicator 7.3.2	16 April 2022	Closed on 9 March 2023
2319871-202303-M1	Major/Critical	RSPO P&C 2018 - INA NI 2020 Indicator 3.8.8	9 March 2023	Closed on 25 March 2023

#### 3.4 Stakeholders and previous landowner / 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 Indotruba Tengah – Sekunyir Palm Oil Mill 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					
<b>Type of Stakeholder</b> (e.g., Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	Stakeholder name / organization	<b>Means of communication</b> (e.g. face to face interview, email, phone interview, comment from public notice)			
Governmental Department of Kotawaringin Barat Regency	<ul> <li>Manpower Agency – Dinas Ketenagakerjaan</li> <li>Plantation Agency – Dinas Pertanian</li> <li>Environmental Agency – Dinas Lingkungan Hidup</li> <li>Lands Office – Kantor Pertanahan (no response)</li> </ul>	phone interview			
Internal Stakeholder	Worker Union Gender Committee New Mother Sample workers	face to face interview			
Communities – local community	Head of Sungai Pakit Village Head of Amin Jaya Village	face to face interview			

#### **Stakeholders comment**

#### Feedbacks: Manpower Agency of Kotawaringin Barat Regency

- PT Indotruba Tengah has established safety committee for company operation.
- PT Indotruba Tengah regularly submit the safety committee report. OHS Committee Report has been given regularly by the company on a periodic basis (3 months), besides that it has also carried out a mandatory report on labour reports.
- PT Indotruba Tengah is encouraged to form and report Bipartite Committee (*Lembaga Kerjasama Bipartit*) even though its already has Labor Union.
- The worker's wage has been given according to 2023 minimum payment.
- There is no other negative issue from the stakeholders or in the perspective of Manpower Agency in 2022-2023

#### **Audit Team verification and response:**

PT Indotruba Tengah did agree with the worker union on the collective work agreement and registered to Manpower Office. There is no negative issue to be followed up.

#### 2 Feedbacks: Plantation Agency of Kotawaringin Barat Regency

- PT Indotruba Tengah is encouraged to put community economic development in its CSR program, not only common charity program. Therefore, the impact to the community can be sustainable.
- The biannual plantation development report (Laporan Perkembangan Usaha Perkebunan/LPUP) was submitted only to Provincial Plantation Agency. The Plantation Agency of Kotawaringin Barat Regency also need to monitor the plantation development report.



• Communication between company and Plantation Office during 2022-2023 is good.

#### **Audit Team verification and response:**

PT Indotruba Tengah has shown the committed subsequent report scheduled (Laporan Perkembangan Usaha Perkebunan/LPUP) for submission to the Plantation Agency of Kotawaringin Barat Regency. There is no negative issue to be followed up

#### 3 Feedbacks: Environmental Agency of Kotawaringin Barat Regency

- PT Indotruba Tengah regularly report the environmental monitoring and management.
- PT Indotruba Tengah has complied with applicable regulations, among others has had environmental document, license of hazardous temporary warehouse, license of POME Land Application,
- There are no official complaints from stakeholder related environmental issue.
- Communication between company and Plantation Office during 2022-2023 is good.

#### **Audit Team verification and response:**

PT Indotruba Tengah has shown the committed subsequent report scheduled (RKL-RPK) for submission to the Environmental Agency of Kotawaringin Barat Regency. There is no negative issue to be followed up

#### 4 Feedbacks: Amin Jaya Village Head & Sungai Pakit Village Head

- Officials give a positive perspective to the company.
- CSR programs were regularly given to the village.
- There was no negative issue regarding the company.
- PT Indotruba Tengah is encouraged to disseminate its annual CSR program. Therefore, the Village Head can know what company's program for village development, not only based on request.
- Communication between company and Plantation Office during 2022 is good

#### **Audit Team verification and response:**

PT Indotruba Tengah maintain communication with surrounding village, one of implementation through social impact assessment questionnaire. There is no negative issue to be followed up.

## Feedbacks: Head of Worker Union – SPSI (*Serikat Pekerja Seluruh Indonesia*) & Head of Gender Committee

- PT Indotruba Tengah has provided adequate housing that the temporary housing is regularly upgraded to temporary housing. The payment has been conducted in accordance with government minimum wage decree of 2022. The PPE also has been provided in accordance with HIRAC or MSDS. Regular meeting of Labor Union with Management Representative has been conducted regularly. There is no negative issue related employment and worker welfare.
- Communication with management through regular meeting is good.
- PT Indotruba Tengah has had a policy to protect female workers from sexual harassment in the workplace as well as a grievance mechanism. The company has implemented regulations related to the reproductive rights such as menstruation leave and childbirth leave (3 months), as well as prohibition of pregnant and breastfeeding women to work in chemical area.
- There were no issues concerning discrimination based on gender in recruitment and promotion, harassment in the workplace, or violation of reproduction rights.

#### **Audit Team verification and response:**

- The auditor has described the company's compliance toward employment and OHS aspects.
- SPSI PT Indotruba Tengah are documented in "Notulen Pembahasan Sistem Kerja dan Libur Satpam Terkait Temuan ILO dan Audit", dated 30 January 2023. This meeting attended by 8 persons and minutes meeting available in Bahasa Indonesia.



The auditors have verified documentation concerning reproductive rights, and there is no negative issue raised

#### 6 Feedbacks: New mother

- PT Indotruba Tengah has assessed and fulfilled the need of new mothers, by providing monthly 'Posyandu' (monthly venue to consult and assess the need and health condition of pregnant mother and baby under 5 years old) including free vitamins.
- PT Indotruba Tengah has provided daycare/creche if the mothers wanted to work again after finishing their childbirth leave.
- The common activities are the female workers shall monitor their menstrual cycles individually and report to health practitioners (doctor, nurses) if menstrual cycles have changes.

#### **Audit Team verification and response:**

PT Indotruba Tengah has conducted assessment of new mothers annually and performed by company doctor. The assessment is provided within Identification Form and documented in "Identifikasi Kebutuhan Ibu Muda/Ibu Baru Program Kesehatan Ibu Hamil dan Melahirkan".

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 –					

During ASA 2.1-year 2023, there was no changes in information.

Based on review of legality documents (HGU Decree, HGU Certificate and Risalah Panitia B) and interview with management, Village Heads and Plantation Agency, it is found that the HGU areas were came from government land bank that initially was purposed for transmigration program. Due to the failure of the transmigration program, the government offered the land to investors. Therefore, there was no land acquisition process to the individual landowners or customary rights and no FPIC related process.

Previou	s landowner / user comment
	Feedbacks:
	-
	Audit Team verification and response:
	-

#### 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 Indotruba Tengah – Sekunyir Palm Oil Mill 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 Indotruba Tengah – Sekunyir Palm Oil Mill is certified.

On Tim is certified:	
Report prepared by	Acceptance of Assessment Conclusion
Name:	Name:
Imam Fakhrurozi	Alagendran Maniam
Company Name:	Company Name:
PT Indotruba Tengah - Sekunyir Palm Oil Mill	PT. Indotruba Tengah — Sekunyir POM
Title:	Title:
Lead Auditor	Head of Sustainability
Signature:	Signature:
5.	(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.)
J'muy	Company
Date: 04/05/2023	Date: 20/06/2023



#### **Appendix A: Summary of Findings**

Criterion	ı / Indicator	Assessment Findings	Compliance
_	e 1: Behave ethically and transparently cal business behaviour, build trust and transparency with stake	eholders to ensure strong and healthy relationships.	
	<b>1.1:</b> The unit of certification provides adequate information te languages and forms to allow for effective participation in de	to relevant stakeholders on environmental, social and legal issues relevant to Fecision making.	RSPO Criteria, in
1.1.1	(C) Management documents that are specified in the RSPO P&C are made publicly available.	PT. Indotruba Tengah-Sekunyir POM prepared procedure listing document made publicly available under "SOP Permintaan Informasi No.01/SPO/2016" dated 5 January 2022. The procedure "Section VI. Waktu Penyampaian Informasi".  As per "SOP Permintaan Informasi No.01/SPO/2016" dated 22 January 2022. The procedure "Daftar Dokumen Yang Boleh Diberikan kepada Para Pihak", there are 29 types of documents of information, including land titles/user rights, occupational health and safety plans, plans and impact assessments relating to environmental and social impacts, HCV & HCS documentation, Corporate Social Responsibility/CSR implementation, pollution prevention and reduction plans, negotiation procedure, and details of complaints and grievances, continuous improvement plans.  This information/document list have been communicated to workers and surrounding communities from villages, 7 July 2022. 23 person attended from Pangkalan Banteng district, Hanau district, Amin Jaya village, Sungai Pakit village.	Complied
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders.	PT. Indotruba Tengah refers to Memorandum No.028/PSQM-UM/VII/2012 dated 31 July 2012, stating that 8 policies and other documents available for public made available in each operating unit, based on request.  Based on interview during stakeholder consultation, company policies available in Bahasa Indonesia.	Complied

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		Based on site visit to Sekunyir POM, Sekunyir Estate and Seruyan Estate, the copy of 8 Company Policies were put on board, available in English and Bahasa Indonesia.	
1.1.3	<b>(C)</b> Records of requests for information and responses are maintained.	Records of requests for information and responses are maintained by unit of certification in form of Log External Communication book at Seruyan Estate (SRE) and "Rekaman Informasi Dari Stakeholder" at Sekunyir Factory (SKF).	Complied
		Sample records of request information in 2022 that was sighted are:	
		Sekunyir Estate (SKE):	
		23 May 2022: incoming letter No: 422.2/1087/14/SMKN1-H/V/2022 from industrial vocation school SMKN-1 Hanau, propose for student internship at Estate within 4 months. This information request has been responded directly to the teacher on site.	
		Sekunyir Factory (SKF):	
		30 January 2023: incoming letter from Energy and Mineral Resource Government Department No: 094/042/I.3/DESDM regarding Monitoring and Surveillance of Operational Permit Implementation. This letter has been responded directly by unit, but approval by top management on 17 February 2023.	
		Records of response of request information documented in the same book, consist of person handle the request, information given and acknowledgement from the person in-charge and signature. Record of incoming communication available in each estate and mill unit.	
1.1.4	<b>(C)</b> Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official.	as per "SOP Komunikasi" No.394/ITH-KOM-01/11, revision 03, dated 14 Sep	Complied
		According to contact with stakeholders, it was clearly acknowledged that communication procedure has been disseminated and informed by Plantation Services Department (PSD) officer.	

1.1.5	An up-to-date list of contacts and detailed stakeholder information is available along with designated representatives.	Unit of certification has determined updated stakeholder list completed with detailed contacts in form of "Daftar Nama Stakeholder PT Indotruba Tengah Tingkat Kabupaten dan Kecamatan Tahun, updated 8 February 2023".  1. Government: 5 regency institutions department, 2 sub-district institutions, 3 police and military department, 2 villages.  2. Community leader/NGO's: 3 chairman of community leader.  3. Contractors: 4 third party contractors and vendors.  4. Labor union: 1 organisation  The stakeholder list is completed with detail information, designated representatives, and its contacts.	Complied
Criteria	1.2: The unit of certification commits to ethical conduct in all b	usiness operations and transactions.	
1.2.1	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.	PT. Indotruba Tengah is a subsidiary of Sime Darby Plantation. Therefore PT. Indotruba Tengah referred to "Kode Etik Bisnis Minamas Plantation" which referring to Code of Business Conduct Handbook Sime Darby Plantation, December 2021". This policy on the conduct of fair and ethical business on all transactions and business operating, including:  - Working with others (Mutual respect; Equal opportunity and no discrimination; Prohibit harassment and violence; Illegal substance, criminal act; Environmental-Health-Safety)  - Avoid Conflict of Interest (Transaction with supplier, customer, agent and competitor; personal transaction with supplier and customer; Membership on legal entity; Family member and personal; Investment)  - Prevent bribery and corruption.  - Gift, Entertainment and Travel  - Donation  - Protection to Group and Shareholder (Protection to Group Asset; Financial information accuracy; Confidential information; Insider trading; Information technology; Archive management; Business communication)	Complied

		<ul> <li>Relation with Business Partner (Partner; Business partner; Antitrust; Environmental access to land and sustainable development)</li> <li>Relation with Government, Politic party, and International Organization (Politic activity; Anti money laundering; Anti-terrorist funding).</li> <li>This information including channel for raising concern for Malaysia, Indonesia, South Africa, Netherlands, other country": eform, email, phone number, hotline, fax, PO BOX address.</li> </ul>	
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.		Complied
		<ul> <li>Dissemination to all Sekunyir POM worker, on 2 December 2021. In addition, each worker sign statement letter has attended code of business conduct training and understand the policy.</li> </ul>	
		- This information on code of ethical business conduct have been communicated to workers and surrounding communities from villages, 7 July 2022. 23 persons attended from Pangkalan Banteng district, Hanau district, Amin Jaya village, Sungai Pakit village.	
		Sample during promotion process:	
		- In Seruyan Estate, promotion of 24 employee based on performance evaluation – started 19 July 2022.	
		- Sighted performance evaluation for the said worker, from Division Assistant, Senior Assistant, Estate Manager.	
		- Decree on grade promotion for 20 workers: Divisional clerk, harvesting clerk, harvesting mandor, head mandor, finance, plantation admin, cashier, purchasing, warehouse leader, payroll dated 14 September 2022.	

		Systems to monitor compliance and ethical business is implemented by unit of certification through internal audit. The internal audit also ensuring all business activity are comply with company policy.  The last internal audits report dated 24 <sup>th</sup> January 2023, the special aspect to ensure indicate RSPO. Record seen: Internal audit report and the followed-up report.	
Principle	e 2: Operate legally and respect rights		
Impleme	nt legal requirements as the basic principles of operation in any	jurisdiction.	
Criteria	<b>2.1:</b> There is compliance with all applicable local, national and	ratified international laws and regulations.	
2.1.1	(C) The unit of certification complies to relevant regulations.	<ol> <li>Unit of Certification has been complied to relevant regulations such as</li> <li>Deed establishment. "Perseroan Terbatas PT. Indotruba Tengah No.178", dated 13 March 1990. Registration to Ministry of Law "Keputusan Menteri Kehakiman Republik Indonesia No.C2-1164.HT.01.01.Th'91" dated 30 March 1991.</li> <li>Land tenure and land-use rights.         <ul> <li>HGU certificate #04/1998, covered 3,260 Ha (Sekunyir Estate) – valid until 24 September 2033, based on "Surat Keputusan Menteri Negara Agraria/Kepala Badan Pertanahan Nasional" No. 152/HGU/BPN/97, dated 26<sup>th</sup> September 1997.</li> <li>HGU certificate #05/1998, covered 829.2 Ha (Sekunyir Estate) – valid until 24<sup>th</sup> September 2033, based on "Surat Keputusan Menteri Negara Agraria/Kepala Badan Pertanahan Nasional" No. 11/HGU/BPN/99, dated 11 April 1998.</li> <li>HGU certificate #05/1998, covered 740.4 Ha (Seruyan Estate) – valid until 23<sup>rd</sup> June 2033, based on "Surat Keputusan Menteri Negara Agraria / Kepala Badan Pertanahan Nasional" No.10/HGU/BPN/98, dated 2 April 1998.</li> </ul> </li> </ol>	Complied

		- HGU certificate #06/1998, covered 2,905 Ha (Seruyan Estate) – valid until 23 <sup>rd</sup> June 2033, based on "Surat Keputusan Menteri Negara Agraria / Kepala Badan Pertanahan Nasional" No.13/HGU/BPN/98, dated 2 April 1998	
		3. Labour. Unit of certification has implementing minimum wage as refer to updated Regional Minimum Wage year 2023 as per Governor Decree No. 188.44/472/2022, dated 6 December 2022 for Seruyan Regency Rate (the highest wage of Kalimantan Tengah province), IDR 3,594,095.56/month.	
		4. Agricultural practices. Hold plantation business license as refer to "Surat Pendaftaran Usaha Perkebun (SPUP) No. 700/Menhutbun-VII/2000" dated 21 June 2000, issued by Minister of Forestry and Plantation, covered 7,734.60 Ha and processing unit (POM) with permitted capacity 45 tonnes FFB/hour and installed capacity 30 tonnes FFB/hour.	
		5. Environment. Unit of certification obtained Environmental Permit Approval "Surat Menteri pertanian Republik Indonesia No.020/RKL-RPL/BA/X/94, Perihal Persetujuan RKL-RPL Perkebunan Kelapa Sawit dan Pabrik Minyak Sawit PT. Indotruba Tengah" dated 18 October 1994.	
		Storage. Toxic and hazardous storage already have official license as refer to "Keputusan Kepala Dinas Penanaman Modal dan Pelayanan Terpadu Satu Pintu Kabupaten Kotawaringin Barat No. 553/011/DPMPTSP-III/LH/2018 tentang Izin Penyimpanan Sementara Limbah Bahan Berbahaya dan Beracun kepada PT. Indotruba Tengah-PKS Sekunyir', dated 25 September 2018 and valid until 5 years.	
2.1.2	A documented system for ensuring legal compliance is in place. This system has means to track changes to the law	Unit of certification has established documented system for ensuring legal compliance through updating list of applicable regulation and internal audit.	Complied
	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.	PT. Indotruba Tengah demonstrated list of applicable regulation and legislation under "Daftar Peraturan Terkait RSPO-ISPO Tahun 2023", updated by Assistant PSD L, D & L on 25 January 2023.	
		The list comprises of 51 Undang-undang/Act; 49 Peraturan Presiden/President Regulation; 4 Instruksi Presiden/President Instruction; 7 Keputusan	

		Presiden/President Decree; 141 Keputusan dan Peraturan Menteri/Ministerial Decree; 2 Governor Decree.	
		The updated for applicable regulation year 2023, e.g.: Regulation related to minimum wage as refer to updated Regional Minimum Wage year 2023 as per Governor Decree No. 188.44/472/2022, dated 6 December 2022 for Seruyan Regency Rate (the highest wage of Kalimantan Tengah province), IDR 3,594,095.56/month.	
		PT. Indotruba Tengah has "SOP Persyaratan Hukum No.011/PH-GP/I/II/11" dated 10 February 2011. Section 5. PIC stated PSD Department and ESH Manager responsible for identifying and inventory and evaluating compliance of all applicable legal and statutory requirement related to OHS, Environmental, Activity, Product, Service of Company; responsible to summarize the applicable legal and statutory requirements; to communicate applicable legal and statutory evaluation to all operating unit and other parties; to maintain the copy of applicable legal and statutory document obtained; to monitor the implementation of applicable legal and statutory.	
		Manager is responsible to communicate applicable legal and statutory evaluation to all subordinates; to understands the legal responsibility; to revise relevant document when new applicable legal and statutory occurs.	
		Control and monitoring were regulated under the SOP; Section 6.2 Compliance stipulates PSD Department, Group Hukum & Perizinan and ESH Manager shall: identifying new regulation applicability, review the impact for current activity/operation; identifying the steps to comply; communicating to all parties, including contractor; monitor the performance through inspection, operational data analysis, internal audit and external audit.	
2.1.3	Legal or authorized boundaries are clearly demarcated and visibly maintained and there is no planting beyond these legal or authorized boundaries.	PT. Indotruba Tengah demonstrated the record on report of inspection and monitoring of legal boundaries – last report on 13-14 January 2023, conducted by Internal Inspection Team consisted of PSD, PSQM and POD. There was identified 46 poles – the pole position is accordance with legal boundary poles map – issued by National Land Agency (BPN). Verified:	Complied

		Sekunyir Estate:	
		• Pole No. BPN-ITH-10 – Block B01 Div.1 Sekunyir Estate. GPS 2° 24′ 44.96″ S     111° 59′ 13.06″ E.	
		• Pole No. BPN-ITH-05 – Block F01 Div.1 Sekunyir Estate. GPS 2° 27′ 20.02″ S    111° 59′ 07.74″ E.	
		• Pole No. BPN-ITH-01 – Block F10 Div.2 Sekunyir Estate. GPS 2° 26′ 53.96″ S    112° 00′ 44.3″ E.	
		Seruyan Estate:	
		• Pole No. BPN-ITH-37 – Block F24 Div.3 Seruyan Estate. GPS 2° 27′ 36.39″ S    112° 2′ 59.13″ E.	
		• Pole No. BPN-ITH-36 - Block G24 Div.3 Seruyan Estate. GPS 2° 27′ 56.22″ S    112° 2′ 58.95″ E.	
		• Pole No. BPN-ITH-35a – Block G24 Div.3 Seruyan Estate. GPS 2° 28′ 12.24″ S    112° 3′ 07.53″ E.	
Criteria	2.2: All contractors providing operational services and supplyin	g labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.	
2.2.1	A list of contracted parties is available.	PT. Indotruba Tengah demonstrated the list of contracted parties, consist of CV Putra Isen Mulang and CV Hanau Jaya Sejahtera.	Complied
		As of March 2023, there was contractor for FFB transportation i.e. CV Putra Isen Mulang and CV Hanau Jaya Sejahtera.	
2.2.2	All contract, including those for FFB supply, contain specific clause on meeting relevant legal requirements and this can be demonstrated by the third party.	Contract of FFB transport as per "Surat Perjanjian Kerja PT Indotruba Tengah – CV Hanau Jaya Sejahtera No. SKE/SPK-LKL/I/2023/002" dated 1 January 2023 – Section 7.8 stipulated - always comply to all legal requirement, including from local government and public official referring and relevant to laws relate to implementation of agreement and other requirement related to health, safety, environment and manpower, including but not limited to prohibit underage worker, forced worker and human trafficking practices.  Evidence for checking requirement from transport contractor:	Complied

		<ul> <li>Notary act "Akta Notaris No.01 CV Hanau Jaya Sejahtera oleh Notaris Yongky Irawan SH MKn" dated 18 January 2022. Registration to Ministry of Justice and Human Rights No.AHU-0004656-AH.01.14" for CV Hanau Jaya Sejahtera dated 18 January 2022.</li> <li>Risk based permit "Perizinan Berusaha Berbasis Resiko Nomor Induk Berusaha CV Hanau Jaya Sejahtera No.1004220004715" dated 10 April 2022. Code 49431 – transport.</li> <li>Registration for social insurance BPJS Ketenagakerjaan CV Hanau Jaya</li> </ul>	
		Sejahtera No.2200000001302524 dated 13 April 2022.  - Sample of worker (driver) age checked: Mr. Hadiyanto, born 4 December 1978 (45 years).	
2.2.3	All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour.	Contract of FFB transport as per "Surat Perjanjian Kerja PT Indotruba Tengah – CV Hanau Jaya Sejahtera No. SKE/SPK-LKL/I/2023/002" dated 1 January 2023 – Section 7.8 stipulated - always comply to all legal requirement, including from local government and public official referring and relevant to laws relate to implementation of agreement and other requirement related to health, safety, environment and manpower, including but not limited to prohibit underage worker, forced worker and human trafficking practices.	Complied
Criteria 2	2.3: All FFB supplies from outside the unit of certification are fi	rom legal sources.	
2.3.1	<ul> <li>(C) For all directly sourced FFB, Palm Oil Mill (POM) requires:</li> <li>Information regarding the geolocation of FFB origins;</li> <li>Proof of ownership status, right/claim of the land by grower/smallholder;</li> <li>If relevant, valid planting/operational/trading license, or is part of a cooperative which allows the buying and selling of FFB.</li> </ul>	PT. Indotruba Tengah – Sekunyir POM mainly received and process FFB coming from company-owned estate, Sekunyir Estate and Seruyan Estate.  - Information regarding geolocation of FFB origins was similar to palm oil mill details (under same company) see Section 1;  - Proof of ownership (under same company) land title see 2.1.1;  - Business license (under same company) of Business permit as in document of "Surat Pendaftaran Usaha Perkebun (SPUP) No. 700/Menhutbun-VII/200" dated 2020.	Non- compliance



PT. Indotruba Tengah – Sekunyir POM received FFB from non-certified oil palm plantation company PT. Indotruba Timur.

Minamas Plantation prepared report "Laporan Responsible Sourcing Guideline for 3<sup>rd</sup> party FFB PT. Indotruba Timur to Sekunyir Factory No.SQM/RSG/2022/01" dated 31 January 2022. The report reviewing the readiness of non-certified FFB supplies from PT. Indotruba Timur: planting year (before and after 2010); environmental aspect (location against peat area, national park, conservation area, protected forest and production forest); social aspect (internal and external disturbance); financial aspect (i.e. tax issues). The report results stated low risk because no peat area in concession, no national park, conservation area, protected forest and production forest in the concession, "Pelepasan Kawasan Hutan of 1,164.75 Ha" in 13 May 2019.

CH demonstrates operating license PT. Indotruba Timur:

- "Keputusan Bupati Seruyan No.188.45/343/2019 tentang Izin Usaha Perkebunan untuk Budidaya (IUP-B) atas nama PT. Indotruba Timur" dated 21 August 2019 for plantation of 1,253.8 Ha.
- CH demonstrates the land title is in process, HGU not issued; "Surat Keputusan Bupati Seruyan No.188.45/90/26 tentang Perubahan dan Perpanjangan Izin Lokasi Seluas 10,500 Ha Menjadi 1,253.8 Ha untuk Keperluan Pelepasan Kawasan Hutan atas nama PT. Indotruba Timur di Desa Pembuang Hulu II Kecamatan Hanau, Kabupaten Seruyan".
- Letter from "PT. Indotruba Timur No. B/014/ITR/UM/GR/VI/2021 to Deputi Bidang Survei Pengukuran dan Pemetaan Up. Direktur Penetapan Batas Bidang dan Direktur Survei dan Penetapan Tematik" stating the company is applying for "Pengukuran kadastral atas lahan seluas 1,003 Ha di Desa Pembuang Hulu II, Kecamatan Hanau, Kabupaten Seruyan, Provinsi Kalimantan Tengah" survey planning for land of 1,003 Ha in Pembuang Hulu II village, Hanau District, Seruyan Regency, Kalimantan Tengah Province, letter dated 16 June 2021.

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		- Letter from "Kementerian Agraria dan Tata Ruang/Badan Pertanahan Nasional Kantor Wilayah Badan Pertanahan Nasional Provinsi Kalimantan Tengah No.IP.02/381-62.200/I/2023; Perihal Pemberitahuan Pelaksanaan pengukuran dan Pemetaan Kadastral PT. Indotruba Timur" dated 27 January 2023. Informing the cadastral measurement for PT. Indotruba Timur started 2 February 2023.	
		List Dokumen Legal PT. Indotruba Timur, period 25 January 2023 whereby report the update on supplier's effort to obtain legal ownership of the plantation. indicating review upon "SK Penetapan Kawasan Hutan" - forest area determination; "Izin Usaha Perkebunan" - Plantation Business Permit; "Nomor Induk Berusaha/NIB" - Business Registration; "Hak Guna Usaha/HGU" - Land Title; "Permohonan Pengajuan HGU" - land title application process/progress.	
2.3.2	For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in indicator 2.3.1.	PT. Indotruba Tengah – Sekunyir POM only receiving and processing FFB coming from company-owned estate, Sekunyir Estate and Seruyan Estate.  - Information regarding geolocation of FFB origins was similar to palm oil mill details (under same company);  - Proof of ownership (under same company);  - Business license (under same company) of Business permit as in document of "Surat Pendaftaran Usaha Perkebun (SPUP) No. 700/Menhutbun-VII/200" dated 2020.  There is no indirectly source FFB. See above.	Complied

#### Principle 3: Optimise productivity, efficiency, positive impact and resilience

Implement plans, procedures and systems for continuous improvement.

Criteria 3.1: There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.

3.1.1	(C) A business or management plan (minimum of three years) is documented and where applicable, includes a jointly developed business case for Scheme Smallholders.	projection, stating the bisigned by Head Sust management plan covering the projection of Seedling Projection of FFB proprojection of CPO proprojection of CPO proprojection of PK prodestimation of PK prodestimation of PK (IDF-Estimation of Revenue Estimation of Product Replanting Program (IDF-IDF-IDF-IDF-IDF-IDF-IDF-IDF-IDF-IDF-	T. Indotruba Tengah". This document described the five-year business rojection, stating the business plan for 2023-2027 of PT. Indotruba Tengah, igned by Head Sustainability & Quality Management. The long-term nanagement plan covered parameter as such as:  Estimation of seedling requirements  Projection of FFB production (MT)  Projection of Oil Extraction and Kernel Extraction (%)  Projection of CPO production (MT)  Projection of PK production (MT)  Estimation of CPO (IDR/MT)  Estimation of PK (IDR/MT)  Estimation of Revenue (IDR)  Estimation of Production Cost (IDR/MT CPO)  Replanting Program (Ha)					
		Description	2023	2024	2025	2026	2027	
		FFB Production (MT)	107,420	106,118	108,619	114,903	130,613	
		OER (%)	23.00	23.15	23.50	23.50	23.50	
		KER (%)	4.50	4.60	4.75	4.75	4.75	
		CPO Production (MT)	35,057	34,984	35,793	37,577	41,269	
		PK Production (MT)	6,859	6,951	7,143	7,595	8,342	

3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available.	The five	Complied				
		Year Seruyan Estate (Ha) Sekunyir Estate (Ha)					
		2023	292.21 (from OP 1993)	397.10 (from OP 1992)			
		2024	302.17 (from OP 1993)	423.36 (from OP 1992 & 1993			
		2025	261.17 (from OP 1993 & 1994	366.10 (from OP 1992 & 1994)			
		2026	252.47 (from OP 1994)	253.11 (from OP 1995)			
		2027	229.01 (from OP 1994)	-			
		For repl measure scale 1 levelling meters; discrepa					
3.1.3	The unit of certification holds management review at planned term according to the scale and nature of the activities undertaken.	Latest internal audit of RSPO P&C carried out by Mr. Tjahjo Moeljo Widjajanto and Mr. Asmara Hadi. Mr. Tjahjo has been trained with RSPO Internal Audit based ISO19001:2002 by PT. Bumi Hijau Cemerlang in January 2011. Mr Asmara Hadi demonstrate training certificate titled Understanding and Implementing RSPO SCCS, by Mutu Institute, 21-22 December 2020.  NCR issued related indicator 1.1.3; 2.2.3; 2.2.2; 3.8.3; 6.7.2; 6.7.3; 7.2.2; 7.3.2 7.10.1; 7.12.2. Based on minutes of management review, all non-conformities from internal audit have been closed out.				Complied	
			Management review conducted as per requirement stating management review carried out after internal audit and prior to external audit, with minimum once in 12 months (1 year). The latest management review carried out on 1 March				



2023, attended by all unit head, internal auditor and COU of PT. Indotruba Tengah.

Management review carried out on 1 March 2023, discussing matters such as:

- Result from last Internal audit result;
- Customer feedback: comments from Pemantang KCP
- Process performance and product appropriateness: from SCRA (Structured Crop Recovery Assessment); and SORA (Structured Oil Recovery Assessment) - period Q4 2022;
- Prevention and improvement action status: from SCRA (Structured Crop Recovery Assessment); and SORA (Structured Oil Recovery Assessment) period Q4 2022;
- Follow up action resulted from the management review
- Changes that could influence management system: from SCRA (Structured Crop Recovery Assessment); and SORA (Structured Oil Recovery Assessment) period Q4 2022;
- Improvement recommendation: from SCRA (Structured Crop Recovery Assessment); and SORA (Structured Oil Recovery Assessment) - period Q4 2022;

#### Review on replanting:

For replanting year 2022, the Minamas Research Center carried out review and measurement upon the replanting works – reported 26 October 2022 with map scale 1:11,000. The MRC measurement result: CECT 100,993.20 meters; levelling 109,943.58 meters; Main drain 8,681.00 meters; Field drains 2,183.44 meters; terrace 776.46 meters; conservation terrace 568.17 meters; discrepancies discussed and finalized in minutes "Berita Acara".

**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.



CC) 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.   Fig. 2022 (period Jan-Dec): Estate:   The reduce harvesting cost by improving harvesting productivity and to reduce FFB transport from IDR 48 to IDR 45/kg.				
Estate:  The reduce harvesting cost by improving harvesting productivity and to reduce FFB transport from IDR 48 to IDR 45/kg.  Collecting FFB using Mini Tractor Prime Mover, therefore increase the productivity of FFB transport.  Reducing fossil fuel for Generator and Wheel tractor. Output is reducing GHG emissions.  Palm Oil Mill  Reduce cost for lorry's bushing by replacing metal bushing with polyp lush.  Replacement of rotary airlock fibre cyclone  Intensively POME ponds management to control odour which impacts to local communities.  Environment:  Reducing fossil fuel for Generator and Wheel tractor. Output is reducing GHG emissions.  Social:  Intensively POME ponds management to control odour which impacts to local communities.  Intensively POME ponds management to control odour which impacts to local communities.  Indirectly benefit obtained by local communities from estate, such as collecting of new workers are recruited from local communities during 2022.	3.2.1	implemented, based on consideration of the main social and environmental impact and opportunities of the unit of	implementation of action plan for continuous improvement as per Kaizen Charter	Complied
Estate:  The reduce harvesting cost by improving harvesting productivity and to reduce FFB transport from IDR 48 to IDR 45/kg.  Collecting FFB using Mini Tractor Prime Mover, therefore increase the productivity of FFB transport.  Reducing fossil fuel for Generator and Wheel tractor. Output is reducing GHG emissions.  Palm Oil Mill  Reduce cost for lorry's bushing by replacing metal bushing with polyp lush.  Replacement of rotary airlock fibre cyclone  Intensively POME ponds management to control odour which impacts to local communities.  Environment:  Reducing fossil fuel for Generator and Wheel tractor. Output is reducing GHG emissions.  Social:  Intensively POME ponds management to control odour which impacts to local communities.  Intensively POME ponds management to control odour which impacts to local communities.  Intensively POME ponds management to control odour which impacts to local communities.  Indirectly benefit obtained by local communities from estate, such as collecting of new workers are recruited from local communities during 2022.			Actual Continuous Improvement Year 2022 (period Jan-Dec):	
reduce FFB transport from IDR 48 to IDR 45/kg.  Collecting FFB using Mini Tractor Prime Mover, therefore increase the productivity of FFB transport.  Reducing fossil fuel for Generator and Wheel tractor. Output is reducing GHG emissions.  Palm Oil Mill  Reduce cost for lorry's bushing by replacing metal bushing with polyp lush.  Replacement of rotary airlock fibre cyclone  Intensively POME ponds management to control odour which impacts to local communities.  Environment:  Reducing fossil fuel for Generator and Wheel tractor. Output is reducing GHG emissions.  Social:  Intensively POME ponds management to control odour which impacts to local communities.  Indirectly benefit obtained by local communities from estate, such as collecting of new workers are recruited from local communities during 2022.			Estate:	
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<ul> <li>Reduce cost for lorry's bushing by replacing metal bushing with polyp lush.</li> <li>Replacement of rotary airlock fibre cyclone</li> <li>Intensively POME ponds management to control odour which impacts to local communities.</li> <li>Environment:         <ul> <li>Reducing fossil fuel for Generator and Wheel tractor. Output is reducing GHG emissions.</li> </ul> </li> <li>Social:         <ul> <li>Intensively POME ponds management to control odour which impacts to local communities.</li> <li>Indirectly benefit obtained by local communities from estate, such as collecting of new workers are recruited from local communities during 2022.</li> </ul> </li> </ul>				
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<ul> <li>Intensively POME ponds management to control odour which impacts to local communities.</li> <li>Environment:         <ul> <li>Reducing fossil fuel for Generator and Wheel tractor. Output is reducing GHG emissions.</li> </ul> </li> <li>Social:         <ul> <li>Intensively POME ponds management to control odour which impacts to local communities.</li> <li>Indirectly benefit obtained by local communities from estate, such as collecting of new workers are recruited from local communities during 2022.</li> </ul> </li> </ul>			- Reduce cost for lorry's bushing by replacing metal bushing with polyp lush.	
Environment:  Reducing fossil fuel for Generator and Wheel tractor. Output is reducing GHG emissions.  Social:  Intensively POME ponds management to control odour which impacts to local communities.  Indirectly benefit obtained by local communities from estate, such as collecting of new workers are recruited from local communities during 2022.			- Replacement of rotary airlock fibre cyclone	
<ul> <li>Reducing fossil fuel for Generator and Wheel tractor. Output is reducing GHG emissions.</li> <li>Social:         <ul> <li>Intensively POME ponds management to control odour which impacts to local communities.</li> <li>Indirectly benefit obtained by local communities from estate, such as collecting of new workers are recruited from local communities during 2022.</li> </ul> </li> </ul>			, , ,	
emissions.  Social:  Intensively POME ponds management to control odour which impacts to local communities.  Indirectly benefit obtained by local communities from estate, such as collecting of new workers are recruited from local communities during 2022.			Environment:	
<ul> <li>Intensively POME ponds management to control odour which impacts to local communities.</li> <li>Indirectly benefit obtained by local communities from estate, such as collecting of new workers are recruited from local communities during 2022.</li> </ul>				
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communities.  - Indirectly benefit obtained by local communities from estate, such as collecting of new workers are recruited from local communities during 2022.			Social:	
collecting of new workers are recruited from local communities during 2022.			· · · · · · · · · · · · · · · · · · ·	
- Road maintenance to surrounding communities access road				
			- Road maintenance to surrounding communities access road	

	As part of the monitoring and continuous improvement	The appual reports are submitted to the DSDO Secretariat by Cortification Pedy	Camadiad
	process, annual reports are submitted to the RSPO Secretariat by Certification Body during Annual Surveillance Assessment by using the RSPO metrics template.		Complied
Criteria 3.3	3: Operating procedures are appropriately documented, con-	sistently implemented and monitored.	
3.3.1	(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.		Complied



- Oil Palm Fertilizer "Penanaman Kelapa Sawit Pemupukan" dated 1 September 2013.
- Oil Palm Canopy "Penanaman Kelapa Sawit Manajemen Kanopi" dated 1 September 2013.
- Oil Palm Ablation "Penanaman Kelapa Sawit Ablasi" dated 1 September 2013.
- Oil Palm harvesting criteria "Penanaman Kelapa Sawit Kriteria Kematangan" dated 1 September 2013.
- Harvesting cycle Oil Palm "Penanaman Kelapa Sawit Pusingan Panen" dated 1 September 2013.
- Loose fruit collection Oil Palm "Penanaman Kelapa Sawit Pengutipan berondolan" dated 1 September 2013.
- Oil Palm protection "Penanaman Kelapa Sawit Proteksi Tanaman" dated 1 September 2013.
- Weed control Oil Palm "Penanaman Kelapa Sawit Pengendalian Gulma" dated 1 September 2013.
- Oil Palm Land cover crop "Penanaman Kelapa Sawit Pembuatan Tanaman Penutup Kacangan" dated 1 September 2013.

SOP for palm oil mill is available on Palm Oil Mill Manual No. POLICY:1110/POD-FAC/2007 and POLICY:130/POD-FAC/07 dated 30 April 2007 divided into different chapter:

- Chapter I Basic for Oil Palm Processing "Dasar-dasar Pengolahan Kelapa Sawit".
- Chapter II Palm Oil and Palm Kernel Storage "Penimbunan Minyak dan Inti Sawit".
- Chapter III Palm Oil Mill Effluent Control "Pengendalian Air Limbah Pabrik".
- Chapter IV Water Treatment "Pengolahan Air".

		- Chapter V Laboratory Analysis "Analisa Laboratorium".	
3.3.2	A mechanism to check consistent implementation of procedures is in place.		Complied

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		<ul> <li>Found unstripped bunch 4% from total whole unstripped bunches/partial unstripped/two-time unstripped bunches</li> <li>Action plan: POM conduct re-analysis to reduce unstripped bunch after thresher;</li> <li>Found hopper EFB conveyor broken.</li> <li>Action plan: Immediate repair for stair, hand rail and platform.</li> <li>Found unsafe condition in front of boiler furnace -backfire from leakage in boiler body.</li> <li>Action plan: to repair inside concrete of the furnace.</li> </ul>	
3.3.3	Records of monitoring and any actions taken are maintained and available.	PT. Indotruba Tengah monitors operational activity in all levels of workers. Each field supervisor has equipped with monitoring sheets/worksheets. For example, harvesting supervisor collected harvesting record and quality of each harvester. The report submitted to estate manager daily.  In palm oil mill, daily operational activity recorded in daily worksheet by mill supervisor before reported to the mill manager.	Complied
		To ensure the result of operational activity in line with the procedures, mill/estate manager conducted regularly monitoring of and management review to solve the findings issues. All results of management review shall be implemented by respective staff.	
		Estate monitoring SCRA (Structured Crop Recovery Assessment) period 30 September – 4 October 2022:	
		- Crop losses Sekunyir Estate 58.54%; Seruyan Estate 54.44%;	
		- Crop quality Sekunyir Estate 27.59%; Seruyan Estate 27.47%;	
		- Freshness Sekunyir Estate 11.82%; Seruyan Estate 11.36%;	
		- Harvest interval Sekunyir Estate avg.14 days; Seruyan Estate avg. 12 days;	
		- Found field with underpruning OP 1997-1999; found field with voluntary oil palm.	
		- Action plan: Immediate pruning program with consideration on cost and	

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	replanting program;	
	- Action plan: Immediate weed control for voluntary oil palm.	
	POM monitoring SORA (Structured Oil Recovery Assessment) period 30 September – 4 October 2022:	
	- Process control/SOP 88%; spillages/leakages 70%; housekeeping 89%; PK quality 75%; CPO quality 83%; Laboratory 88%; Oil losses (to sample) 83%; Kernel losses (to sample) 100%; Oil losses (to FFB) 100%; Kernel losses (to FFB) 92%; ESH/Security 96%;	
	- Found unstripped bunch 4% from total whole unstripped bunches/partial unstripped/two-time unstripped bunches	
	Action plan: POM conduct re-analysis to reduce unstripped bunch after thresher;	
	- Found hopper EFB conveyor broken.	
	Action plan: Immediate repair for stair, hand rail and platform.	
	- Found unsafe condition in front of boiler furnace -backfire from leakage in boiler body.	
	Action plan: to repair inside concrete of the furnace.	
	• • • • • • • • • • • • • • • • • • • •	d environmental
<b>(C)</b> SEIA in new planting or operation including mills, is conducted independently and participatively by involving the		Complied
affected stakeholders, inclusive of impact assessment from the smallholder/outgrower scheme (if any). The assessment is to be documented.	During ASA 2_1 year 2023, there were not any changed the document of SIA and SEIA.	
	A comprehensive Social and Environmental Impact Assessment (SEIA) has been carried out by PT. Indotruba Tengah (cooperated with independent consultant PT. Anima Rekayasa Perkasa) before development of mill and plantation. SEIA document present in "Laporan Akhir Analisis Dampak Lingkungan (ANDAL)	
	(C) SEIA in new planting or operation including mills, is conducted independently and participatively by involving the affected stakeholders, inclusive of impact assessment from the smallholder/outgrower scheme (if any). The assessment	- Action plan: Immediate weed control for voluntary oil palm.  POM monitoring SORA (Structured Oil Recovery Assessment) period 30 September – 4 October 2022:  - Process control/SOP 88%; spillages/leakages 70%; housekeeping 89%; PK quality 75%; CPO quality 83%; Laboratory 88%; Oil losses (to sample) 83%; Kernel losses (to sample) 100%; Set (so sample) 100%; Set (so sample) 100%; Set (so sample) 100%; Set (so sample) 100%; Oil losses (to FFB) 100%; Kernel losses (to FFB) 92%; ESH/Security 96%;  - Found unstripped bunch 4% from total whole unstripped bunches/partial unstripped/two-time unstripped bunches Action plan: POM conduct re-analysis to reduce unstripped bunch after thresher;  - Found hopper EFB conveyor broken. Action plan: Immediate repair for stair, hand rail and platform.  - Found unsafe condition in front of boiler furnace -backfire from leakage in boiler body. Action plan: to repair inside concrete of the furnace.  3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and sent and monitoring plan is implemented and regularly updated in ongoing operations.    CC   SEIA in new planting or operation including mills, is conducted independently and participatively by involving the affected stakeholders, inclusive of impact assessment from the smallholder/outgrower scheme (if any). The assessment for the smallholder/outgrower scheme (if any). The assessment for the smallholder/outgrower scheme (if any). The assessment for and SEIA.  A comprehensive Social and Environmental Impact Assessment (SEIA) has been carried out by PT. Indotruba Tengah (cooperated with independent consultant PT. Anima Rekayasa Perkasa) before development of mill and plantation. SEIA

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		Perkebunan Kelapa Sawit Kumai dan Pabrik Minyak Sawit PT. Indotruba Tengah" year 1993.  Aspect of plantation and mill management that have social and environmental impact were identified and listed on SEIA document. SEIA are conducted since 1993 and covered 10,000 Ha plantation areas and maximum mill capacity are 60 MT FFB/hour, this document has been approved by Agriculture Department based on decree No.220/95/B/I/94 dated 17 January 1994 and Approval Letter from Agriculture Department No. 020/RKL-RPL/BA/X/94, dated 18 October 1994.  During SEIA, the company conducted stakeholders meeting with surrounding local communities which affected the project. The SEIA has been conducted and documented according to local requirements and include consultation with relevant stakeholders to identify impact and to develop any mitigation measures.  Another SIA study also conducted by Aksenta consultant on 24 – 28 August 2009. Final report of SIA document was published on January 2010. SIA study conducted through participative by involving affected stakeholder (surrounding community, local government, company, and non-government organisation). Evidence of stakeholder consultation and focus group discussion were available in the document.	
3.4.2	For the unit of certification, a SEIA is available and social and environmental management plan and its monitoring have been developed with participation of affected stakeholders.	During audit SEIA document were available. Social and environmental management plan and its monitoring have been developed as per RKL – RPL document. RKL – RPL document is part of SEIA document which has been communicated and involving the affected parties and stakeholder.  Social Environment management and monitoring plan to prevent negative impact such as:	Complied
		<ul> <li>Soil fertility management and soil erosion prevention by EFB mulching to increase organic material, land cover crop planting, U shape palm oil frond stacking, silt pit and road silt pit development, individual terracing in slope area, mounting, water management and neprolephis planting, appropriate fertilizing according to procedure.</li> </ul>	

		Water quality management to prevent water pollution by wastewater	
		management at palm oil mill with land application according to regulation and permit. Water quality monitoring is conducted each semester to monitor the water quality met with regulation threshold.	
		• Air quality and noise management by centralized the housing area/emplacement, provision of PPE masker and earmuff for workers at mill,	
		Biodiversity management and monitoring to enhance and protect the biodiversity within the plantation area by establishing HCV area and conserve the HCV area, management and monitoring HCV area, socialization to workers and surrounding community.	
		Hazardous waste handling and monitoring. The company has developed temporary hazardous waste storage and manages hazardous waste according to regulation.	
		<ul> <li>Fire prevention and mitigation. The company has established procedures for emergency response and develop the emergency response team; training and simulation related to fire prevention and mitigation; monitoring hotspot and fire during dry season.</li> </ul>	
		Enhance surrounding community economic rate and environment healthy.  The company has a developing approach program of CSR.	
		Social Impact Assessment by Aksenta consultant on 24 – 28 August 2009 was prepared with focus group discussion with worker on 25 August 2009; focus group discussion with surrounding community on 26 August 2009. Attendance from Amin Jaya village, Derangga village, Karang Mulya village, Pembuang Hulu II village.	
3.4.3	<b>(C)</b> The social and environmental management and monitoring plan is implemented, reviewed, and updated regularly in participatory way.	Implementation of social and environmental management and monitoring plan, reviewed, and updated can be demonstrated as per "Laporan Hasil Pelaksanaan RKL – RPL" – last report for period July – December 2022.	Complied



Report of RKL – RPL were evaluated and reported each semester to government institution (Kementerian Lingkungan Hidup dan Kehutanan) through online system reporting (SIMPEL).

Each institution such as "Dinas Lingkungan Hidup" in local regency and province can access the report through SIMPEL. Evidence of reporting can be demonstrated during audit, sample seen for report year 2022:

- Tanda Terima Elektronik dated 1<sup>st</sup> March 2023, Reporting period for 2<sup>nd</sup> Semester year 2022 (July December), Company ID 1261.
- "Surat Pengantar PT. Indotruba Tengah kepada Dinas Lingkungan Hidup Kabupaten Kotawaringin Barat No.07/SKF-SP/III/2023, Laporan RKL-RPL Semester II 2022 PT. Indotruba Tengah", dated 2<sup>nd</sup> March.
- Report RKL RPL are publicly available for stakeholder to be access and reviewed.

The SEIA management and monitoring plan:

- Maintain soil fertility and erosion: use of EFB, use of POME (incl. monitoring BOD), construction silt pit, roadside pit, U-shape frond stacking, platform, maintain *Neurolepts*, conduct leaf census, fertilizer follow recommendation, monitoring soil fertility in land application, monitoring erosion.
- Water quality and Effluent management: using POME pond installation, and POME land application, monitoring and recording effluent water, monitoring and recording well water.
- Air quality and noise: boiler chimney and planting trees around POM, provision of PPE (masker, ear protection and helmet) for worker, monitoring air emission, odour and ambient, monitoring boiler and genset emission and noise.
- Flora and Fauna Biodiversity: established HCV map, socialization HCV to all staff and worker, prohibit hunting-poaching-poisoning, monitoring HCV, monitoring wildlife.

		<ul> <li>Hazardous waste management: temporary hazardous waste storage with license, transporting hazardous waste with licensed transporter, monitoring hazardous waste balance, reporting to government.</li> <li>Fire Prevention and Fire Control: Establish firefighting team, training to firefighting team, prepare firefighting infrastructure, equipment and tools, fire danger rating and fire risk.</li> <li>Surrounding community social, economy, culture and health condition: communication, partnership with cooperative for FFB transport, provide qurban, road hardening, aide for school and student, medical treatment for</li> </ul>	
		community.  Participative Social Impact Management Review "Review Management Rencana & Realisasi Pengelolaan dan Pemantauan Dampak Sosial Perkebunan Secara Partisipatif – PT. Indotruba Tengah 2022", dated 14 January 2023. Explained industrial relation aspect, public servicing aspect, surrounding community economic development aspect, FPIC and conflict resolution aspect, environment aspect.  Socialization and communication to relevant stakeholder on 15 <sup>th</sup> November 2022, attended by 11 community representatives: Amin Jaya village, Sungai Pakit village, Pembuang Hulu II village, Karang Mulya village, Derangga village.	
Criteria 3	3.5: A system for managing human resources is in place.	- and image, i amount indicate things, indicate indicate things in the second s	
3.5.1	Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives in accordance with the applicable regulation.	PT. Indotruba Tengah refers to corporate procedure for hiring worker, regulated that hiring and promotion of workers based on skill, work experiences, and job evaluation as per document "Standard Operating Procedure – Penerimaan Karyawan No. 394/ITH-SOP-26/11".	Complied
		<ul> <li>The procedure has explained:</li> <li>Prepared meet 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.</li> </ul>	

		- Job opportunities were communicated and given to surrounding villagers as a priority where no discrimination was observed during interviews and related records of workers being employed. All workers have been treated equally in accordance with company regulations including the rights of worker as well.  Based on interview with workers in the Estates and Mills, it is known that workers have received documentation of hiring (surat pengangkatan) and promotion (surat promosi). The clauses in the contractual agreement have complied with the national employment regulation. The procedure of recruitment, promotion and retirement has been disseminated and implemented well. There is no discrimination related those processes, which the application and promotion assessed based on requirements and assessments of competencies and achievements, that has been described in the vacancies in advance. There is no	
		distinguishment of rights and obligations in the same employment types.	
3.5.2	Employment procedures are implemented and records are maintained.	Audit team made interview and document review for worker promotion, retirement, and termination (retirement) process. Sample of documentation of grade promotion for instance:	Complied
		- Grade promotion year 2022 in Seruyan Estate: Mr. S****to; from replanting worker to replanting mandor;	
		- The documentation consists of assessment and evaluation form, promotion form, approval from Region HR Head No.194/SRE-Int/IX/2022 dated 1 September 2022.	
		Sample of documentation of promotion from temporary worker to permanent worker:	
		Sekunyir Estate (approved): Performance evaluation, Permanent (full time) Worker Application of 20 workers, Letter of Sekunyir Estate Manager to Area Controller related proposal for workers addition dated 14 January 2023; approval from Area Controller dated 20 February 2023. The issuance of appointment letter of permanent workers is in process. The permanent worker approved comprised of 8 harvesters, 2 carrier, 3 teachers, 1 midwife, 1 paramedic, 3 replanting	

		workers, 1 nursery clerk, 1 research worker. Effective working as permanent worker 1 April 2023.	
Criteria	3.6: An Occupational health and safety (H&S) plan is documen	ted, effectively communicated and implemented.	
3.6.1	<b>(C)</b> All operational activities risks assessed to identify the H&S issues. Mitigation plans and procedures are documented and implemented.	PT Indotruba Tengah – Sekunyir POM has established the OHS policy that was signed by Head of Plantation Upstream Indonesia in December 2011, stated that the company committed to provide safety and health workplace by implementation effectively management to prevent workplace accidents and unhealthy to all employees, guest, and contractor. The policy was also displayed on public boards both in mill and estates.	Complied
		PT Indotruba Tengah – Sekunyir Pom has also prepared the procedure for Identification and evaluation of hazardous potential evaluation (No. Doc. 724/TQEM-ESH/10).	
		PT Indotruba Tengah – Sekunyir POM has defined HIRAC (Hazard Identification, Risk Assessment and Control) for Sekunyir Mill, Sekunyir Estate, and Seruyan Estate, last review on 23 <sup>rd</sup> January 2023.	
		All the operational activities that have been covered, such as: land clearing, manuring, harvesting, road maintenance, FFB transport, IPM activities, weighbridge, grading station, sterilizer station, pressing station, engine room, boiler, dispatch of CPO.	
		All working risks have men identified and mitigated, such as by giving regular training, increasing supervision, PPE provision, and regular medical check-up.	
		Based on field observation and interview with workers and Labor Union, the HIRAC (dated 7 and 8 March 2023) has been implemented in the field such as by giving regular dissemination of OHS awareness and provision of appropriate PPE. One of the improvements of to reduce risk is by build specific storage for harvesting pole and sickle in every housing area. The harvesters are prohibited to store their sickle in the house.	
		MCU has conducted in December 2022 by PJK3 – PT Cahaya Krisnako. Sample seen: Certificate Hasil Pemeriksaan Kesehatan Kerja, No Registrasi:	

		33/CPK/XII/2022 dated 17 December 2022 namely Mr Sarvina (pesticides applicator), Mr Sugianto (manuring).	
3.6.2	<b>(C)</b> The effectiveness of the H&S plan to address health and safety risks to people is monitored.	PT Indotruba Tengah – Sekunyir Plam Oil Mill has managing and monitoring the aspects of occupational health and safety through the annual "Health and Safety Plan 2022-2023", such as:	Complied
		Comply with all applicable laws, regulations, and standards.	
		Ensure best management practices with Zero Accident and Zero Fatality objectives. There was no accident with fatality category.	
		Ensure optimal socialization and training.	
		Do the correctives action: Performing revision of the procedure, completing the PPE.	
		Monitoring of statistic.	
		Program evaluation.	
		The effectiveness of the H&S plans to address health and safety risks have been monitored in the form of:	
		Monthly OHS Committee meeting, to discuss and address current OHS issues.	
		<ul> <li>Documentation of accident record and the calculation of LTA.</li> <li>Annual review of HIRAC.</li> </ul>	
		Trimester OHS Report, that has been submitted regularly to Manpower Agency. The recent report is for period of October – December 2022, has been reported on 16 February 2023.	
Criteria	3.7: All staff, workers, Scheme Smallholders, outgrowers, and	contract workers are appropriately trained.	
3.7.1	(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-	PT. Indotruba Tengah has shown the document of training program.  Training program has shown as per "Daftar Rencana Pelatihan 2023", updated on 20 January 2023 consisted of:	Complied

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	specific needs, and which covers applicable aspects of P&C	(Refreshment) Training of harvesting, planned in January.	
	Principles, in a form they understand and includes assessment of the training.	(Refreshment) Training of spraying operator, planned in February.	
	assessment of the training.	(Refreshment) Training of fertilizing, planned in March.	
		(Refreshment) Training of Integrated Pest Management, planned in April.	
		(Refreshment) Training for handling hazardous chemical material, planned in May.	
		(Refreshment) Training for sterilizer operation, planned in June.	
		(Refreshment) Training for loading ramp operation, planned July.	
		Refreshment training on implementation of RSPO requirement for staff and supervision, planned in June and December.	
		OHS training for all workers, planned in October, February, and June.	
		Training on handling of hazardous waste, planned in March.	
		• Training for operator in mill, e.g.: boiler operator, engine room operator, pressing operator.	
		Refreshment training/socialization of the company's policies.	
		Refreshment training of HCV.	
		Record of training realization provided in indicator 3.7.2.	
3.7.2	Records of training are maintained, where appropriate on an	Document of implementation the training has demonstrated, e.g.,	Complied
	individual basis.	• Refreshment training of agrochemical handling, dated 22 June 2022, attended by 13 participants.	
		• Refreshment training of Integrated Pest Management, dated 15 March 2022, attended by 9 participants.	
		<ul> <li>Refreshment training of the uses of harvesting tools, dated 12 August 2022, attended by 22 participants.</li> </ul>	
		• Training related to RSPO Supply Chain Certification Standard to relevant personnel. Latest training on 9 February 2023 to Sekunyir POM team: mill manager, section head, senior assistant, process assistant, SQM staff,	

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		weighbridge and dispatch operators, production clerk, safety officer, grading workers, security, 23 process workers, representative of PT. Indotruba Timur (FFB supplier).	
3.7.3	Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.	PT. Indotruba Tengah demonstrated continuous training related to RSPO Supply Chain Certification Standard to relevant personnel. Latest training on 9 February 2023 to Sekunyir POM team: mill manager, section head, senior assistant, process assistant, SQM staff, weighbridge and dispatch operators, production clerk, safety officer, grading workers, security, 23 process workers, representative of PT. Indotruba Timur (FFB supplier). The training cover's purpose of RSPO SCCS implementation, RSPO SCCS modules, RSPO SCCS procedures, including traceability.	Complied
	<b>3.8:</b> Supply chain requirements for mills. re note: all requirements are classified as Critical Indicators. How	wever it will not contribute to suspension if there is more than 5 non-compliance w	ithin a principle)
3.8.1	Identity Preserved Module  A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.  Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.	PT. Indotruba Tengah – Sekunyir POM not implementing Identity Preserved. The mill now received non-certified FFB from PT. Indotruba Timur.	Complied
3.8.2	Mass Balance Module A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from	PT. Indotruba Tengah - Sekunyir POM received and processed FFB form uncertified FFB from PT Indotruba Timur, therefore the mill using Mass Balance as the supply chain model.	Complied

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	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.		
3.8.3	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.	report, certificate and RSPO IT Platform.  The palm oil mill has met registration and reporting requirement as it registered in RSPO IT Platform (PalmTrace) with ID number RSPO_PO1000000321.  Below is the total volume of certified oil palm product (CPO and PK) that the	Complied
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.		Complied
3.8.5	Documented procedures  The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:	dated 2 July 2020.	Complied

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	<ul> <li>a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</li> <li>b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</li> <li>c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill's procedures for the implementation of this standard.</li> <li>d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill.</li> </ul>	As per Manual, the responsible person in charge to the supply chain system is Mr. Sudarwedi Hidayat – Kepala Seksi Administrasi PKS Sekunyir as per Inter Office Mail from Manager No.005/SKF/MR/III/2020 dated 3 March 2020. During audit, the PIC is able to demonstrate sufficient knowledge and understanding on RSPO supply chain implementation for palm oil mill.  PT. Indotruba Tengah – Sekunyir POM has a procedure for receiving and processing certified and non-certified FFBs including ensuring no contamination in the mill (even though now implement Mass Balance), as described in Section "4.3 Pembelian dan Barang Masuk".	
3.8.6	<ul> <li>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill;</li> <li>a) Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</li> <li>b) Effectively implements and maintains the standard requirements within its organisation.</li> <li>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.</li> </ul>	PT. Indotruba Tengah — Sekunyir POM demonstrates "Manual RSPO SCCS Standar Sertifikasi Rantai Pasok RSPO Dokumen No.SCCS-Std/RSPO/PSQM/02", dated 2 July 2020. Section 4.2.3 indicated Internal audit will be carried out minimum 2 months prior to external audit.  Latest internal audit of RSPO P&C carried out on 28-31 January 2023. Internal auditor was Mr. Tjahjo Moeljo Widjajanto and Mr. Asmara Hadi. Mr. Tjahjo has been trained with RSPO Internal Audit based ISO19001:2002 by PT. Bumi Hijau Cemerlang in January 2011. Mr Asmara Hadi demonstrate training certificate titled Understanding and Implementing RSPO SCCS, by Mutu Institute, 21-22 December 2020.  During internal audit, there were 7 critical NC and 4 minor NC issued related to implementation of RSPO P&C Indonesia NI 2020. Correction and Corrective Action have been determined and implemented, due date on 3 March 2023.  Management review conducted as per requirement stating management review carried out after internal audit and prior to external audit, with minimum once	Complied

		in 12 months (1 year). The latest management review carried out on 1 March 2023, attended by all unit head, internal auditor and COU of PT. Indotruba Tengah.	
3.8.7	Purchasing and Goods In  i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.  ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.  iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.	PT. Indotruba Tengah — Sekunyir POM has demonstrated "Manual RSPO SCCS Standar Sertifikasi Rantai Pasok RSPO Dokumen No.SCCS-Std/RSPO/PSQM/02", dated 2 July 2020 "4.3 Pembelian dan Barang Masuk" indicates the Weighbridge Operator in POM has to ensure supplier information covers 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. Marketing in Jakarta is responsible to verify the validity of supplier certificate or trader and distributor license.  PT. Indotruba Tengah — Sekunyir POM receive FFB from certified source and non-certified source. Certified source consist of company-owned Sekunyir Estate and Seruyan Estate. Non-certified source from PT. Indotruba Timur. Document "Surat Pengantar Buah" (FFB Delivery Note) and FFB weighing ticket described identity and location of FFB source and other item required e.g.  Certified FFB:  FFB delivery "Surat Pengantar Buah No.23-01-0440" dated 16 February 2023 from Sekunyir Estate, Division I, Block 13F002 (736 bunches); vehicle KH8006GP, stamp "RSPO Certified";  Weighbridge ticket "Sekunyir Factory" No.227954 dated 16 February 2023, for 736 FFB bunches; nett weight 8,650 kg; from Sekunyir Estate, Division I, Block 13F002; vehicle KH8006GP; Driver Jatrikno; stamp "RSPO Certified".  FFB delivery "Surat Pengantar Buah No.2301-0229" dated 16 February 2023 from Seruyan Estate, Division I, Block 98A018 – total 380 bunches; vehicle PM 07, stamp "RSPO Certified".  Weighbridge ticket "Sekunyir Factory" No.277971 dated 16 February 2023, for 380 FFB bunches; nett weight 7,130 kg; from Seruyan Estate, Block 98A018; vehicle PM 007; Driver Kasmono;	Non-compliance

		April 2023 504 bunch - Weighbrid- for 504 FFI I, Field 1; V PT. Indotrub Standar Serti dated 2 July of them exp documents.	ry "Surat Pengantar Buah No.1820 from PT. Indotruba Timur, Division les; vehicle KH 8793 AD; stamp "Nge ticket "Sekunyir Factory" No.2 B bunches; nett weight 6,712 kg; fivehicle KH 8793 AD; Driver Andi Asa Tengah – Sekunyir POM has de ifikasi Rantai Pasok RSPO Dokume 2020; Section 4.3 "Pembelian dan lains about mechanism for handlemTrace certified volume and Mill p	n I, Block 98B25 and 98B29; total lon RSPO certified"; 27963 dated 16 February 2023, rom PT Indotruba Timur, Division rori; stamp "Non RSPO certified". monstrated "Manual RSPO SCCS n No.SCCS-Std/RSPO/PSQM/02", Barang Masuk (Goods In)", one ing non-conforming FFB and/or roduction statistic, obtained data	
		Product	PalmTrace certified volume (license period May 2022-April 2023)	Actual production since last recertification assessment (Statistic SKF)	
			MT	MT	
		FFB	125,898.00	102,957.23	
		CSPO	29,271.28	22,477.17	
		CSPK	6,294.00	4,253.44	
3.8.8	Sales and Goods Out The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range	sold as conve RSPO CSPK v	PO PalmTrace information, the CS entional product.  vas sold to sister-company PT. Teg completed with Delivery documen	uh Sempurna. The CSPK certified	Non- compliance



of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):

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

- Sales Contract PT. Indotruba Tengah No.00249/ITH/KTR-KERNEL/LOK/IX/2022 dated 7 September 2022. Commodity: Kernel. Quantity: 350 MT. Seller: PT. Indotruba Tengah. Seller Address: The Plaza Tower Lt. 36, Jl. MH Thamrin kav.28-30, DKI Jakarta 10350. Buyer: PT. Teguh Sempurna KCP; Buyer Address: The Plaza Tower Lt. 36, Jl. MH Thamrin kav.28-30, DKI Jakarta 10350. Delivery Order No. 00256/00249/09/22/L-ITH-KERNEL. Delivery period 7-30 September 2022. Terms of Delivery by truck
- Delivery Order No.00256/00249/09/22/L-ITH-KERNEL, dated 7 September 2022. Seller: PT Indotruba Tengah. Buyer: PT. Teguh Sempurna. Product: CSPK. Quantity 350 MT. Name of vessel: by truck.
- "Surat Pengantar IKS No.SKF-IKS/IX/2022" for DO No. 00256/00249/09/22/L-ITH-KERNEL; Contract No.00249/ITH/KTR-KERNEL/LOK/IX/2022; Seller PT. Indotruba Tengah-Sekunyir POM; Buyer PT. Teguh Sempurna; Quantity 14,400 kg; Truck No. DA8274PN; Delivery Date 20 September 2022.
- Sample weighbridge ticket No.003137; for DO No. 00256/00249/09/22/L-ITH-KERNEL; Seller PT. Indotruba Tengah-Sekunyir POM; Buyer PT. Teguh Sempurna; Product Palm Kernel; Quantity 14,400 kg; Truck No. DA8274PN; Delivery Date 20 September 2022. No RSPO Certificate Number RSPO744702.
- Notes of receive "Berita Acara Serah Terima Pengiriman IKS" No.00255/BAP-ITH/SKF/IX/2022 dated 27 September 2022, between first party Firman Efendi (Factory Manager PT. ITH Sekunyir POM), and second party Sutrisno (Manager KCP Pemantang) for acceptance of 351,640 kg Kernel based on DO NO.00256/00249/09/22/ITH-IKS (from 26 deliveries by truck).
- Shipping Announcement Transaction ID TR-d6911924-c599. Seller: Sime Darby Plantation Sekunyir POM, PT ITH. Member ID: RSPO\_PO1000000321. Buyer: PT Teguh Sempurna Pemantang KCP. Member ID: RSPO\_PO1000004688. Product name: CSPK. Supply Chain Model: Mass Balance. Volume 350.71 MT. Contract No. 00249/ITH/KTR-KERNEL/LOK/IX/2022; Shipping date 30/09/2022. B/L Number N/A (trucking). Confirmation date 17/01/2023.



The CSPK certified delivery was completed with Delivery document as follow:

- Sales Contract PT. Indotruba Tengah No.00254/ITH/KTR-KERNEL/LOK/I/2023 dated 2 January 2023. Commodity: Kernel. Quantity: 350 MT. Seller: PT. Indotruba Tengah. Seller Address: The Plaza Tower Lt. 36, Jl. MH Thamrin kav.28-30, DKI Jakarta 10350. Buyer: PT. Teguh Sempurna KCP; Buyer Address: The Plaza Tower Lt. 36, Jl. MH Thamrin kav.28-30, DKI Jakarta 10350. Delivery Order No. 00261/00254/01/23/L-ITH-KERNEL. Delivery period 3-26 January 2023. Terms of Delivery by truck.
- Delivery Order No.00261/00254/01/23/L-ITH-KERNEL, dated 2 January 2023. Seller: PT Indotruba Tengah. Buyer: PT. Teguh Sempurna. Product: CSPK. Quantity 400 MT. Name of vessel: by truck.
- Transport note "Surat Pengantar IKS No.SKF-IKS/IX/2022" for DO No. 00261/00254/01/23/L-ITH-KERNEL; Contract No.00254/ITH/KTR-IKS/LOK/I/2023; Seller PT. Indotruba Tengah-Sekunyir POM; Buyer PT. Teguh Sempurna; Quantity 14,180 kg; Truck No.KH8491FD; Delivery Date 28 January 2023.
- Sample weighbridge ticket "Despatch" No.063654; for DO No. 00281/00254/01/23/L-ITH-KERNEL; Seller PT. Indotruba Tengah-Sekunyir POM; Buyer PT. Teguh Sempurna; Product Palm Kernel; Quantity 14,180 kg; Truck No.KH8493FD; Delivery Date 28 January 2023. No RSPO Certificate Number RSPO744702.
- Notes of receive "Berita Acara Serah Terima Pengiriman IKS" No.00261/BAP-ITH/SKF/I/2023 dated 8 February 2023, between first party Firman Efendi (Factory Manager PT. ITH Sekunyir POM), and second party Sutrisno (Manager KCP Pemantang) for acceptance of 395,980 kg Kernel based on DO NO.00261/00254/01/23/ITH-IKS (from 29 deliveries by truck).
- Shipping Announcement Transaction ID TR-e5f26184-a961. Seller: Sime Darby Plantation Sekunyir POM, PT ITH. Member ID: RSPO\_PO100000321.
   Buyer: PT Teguh Sempurna Pemantang KCP. Member ID:



RSPO\_PO1000004588. Product name: CSPK. Supply Chain Model: Mass Balance. Volume 328.28 MT. Contract No. 00254/ITH/KTR-KERNEL/LOK/I/2023; Shipping date 30/01/2023. B/L Number N/A (trucking). Confirmation date 21/02/2023.

Information for RSPO certified products made available:

- The name and address of the buyer: PT. Teguh Sempurna. The Plaza Tower Lt. 36, Jl. MH Thamrin kav.28-30, DKI Jakarta 10350;
- The name and address of the seller: PT. Indotruba Tengah. The Plaza Tower Lt. 36, Jl. MH Thamrin kav.28-30, DKI Jakarta 10350;
- The loading or shipment/ delivery date: available;
- The date on which the documents were issued: available;
- A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations): CSPK/Mass Balance;
- The quantity of the products delivered: available;
- Any related transport documentation: Transport Note, "Surat Pengantar IKS and Weighbridge Ticket;
- Supply chain certificate number of the seller: RSPO744702
- A unique identification number: D/O number

#### NC Critical:

The documents for sales of CSPK from PT. Indotruba Tengah-Sekunyir POM does not indicate RSPO certificate number for the certification unit.

#### Objective evidence:

Weighbridge ticket "Despatch" No.064102; for DO No. 00262/00255/02/23/L-ITH-KERNEL; Seller PT. Indotruba Tengah-Sekunyir POM; Buyer PT. Teguh Sempurna; Product Palm Kernel; Quantity 14,320 kg;

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		Truck No.KH8491FD; Delivery Date 3 March 2023. Not indicate RSPO Certificate Number.  • Weighbridge ticket "Despatch" No.064140; for DO No. 00262/00255/02/23/L-ITH-KERNEL; Seller PT. Indotruba Tengah-Sekunyir POM; Buyer PT. Teguh Sempurna; Product Palm Kernel; Quantity 12,470 kg; Truck No.KH8991FB; Delivery Date 4 March 2023. Not indicate RSPO Certificate Number.	
3.8.9	<ul> <li>Outsourcing Activities</li> <li>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.</li> <li>ii) The mill shall ensure the following: <ul> <li>a) The mill has legal ownership of all input material to be included in outsourced processes</li> <li>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.</li> <li>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</li> </ul> </li> </ul>	The mill does not outsource its milling activity or transport activity. Transport of CSPO is instructed and managed by buyer. Transport of CSPK is using companyowned vehicle.  Not applicable.	Not Applicable

	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.		
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	PT. Indotruba Tengah – Sekunyir POM does not outsource its milling activity or transport activity. Transport of CSPO is instructed and managed by buyer. Transport of CSPK is using company-owned vehicle.  Not applicable.	Not Applicable
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	PT. Indotruba Tengah – Sekunyir POM does not outsource its milling activity or transport activity. Transport of CSPO is instructed and managed by buyer. Transport of CSPK is using company-owned vehicle.  Not applicable.	Not Applicable
3.8.12	<ul> <li>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.</li> <li>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.</li> <li>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.</li> <li>iv) For Mass Balance Module, the mill:</li> </ul>	PT. Indotruba Tengah has maintained accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements as following:  - Delivery order  - Daily mill reports  - Daily reports  - Monthly report  - Weighbridge ticket of FFB  - Weighbridge ticket of CSPK  - Sales document and delivery document  - PalmTrace Shipping Announcement and confirmation  - Training record  - Internal Audit	Complied



- a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.
- b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.
- c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock).

- Minute of Management Review.

RSPO SCCS Training record: on 9 February 2023 to Sekunyir POM teams mill manager, section head, senior assistant, process assistant, SQM staff, weighbridge and dispatch operators, production clerk, safety officer, grading workers, security, 23 process workers, representative of PT. Indotruba Timur (FFB supplier). The training cover's purpose of RSPO SCCS implementation, RSPO SCCS modules, RSPO SCCS procedures, including traceability.

PT. Indotruba Tengah – Sekunyir POM has demonstrated "Manual RSPO SCCS Standar Sertifikasi Rantai Pasok RSPO Dokumen No.SCCS-Std/RSPO/PSQM/02", dated 2 July 2020 "4.7 Record Keeping" indicates the Retention times for all records and reports shall be a minimum of ten (10) years and shall comply with relevant legal and regulatory requirements.

Based on Daily Mill Record, the mill can record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.

Mass balance record available for 3-monthly period: April-June 2022; July-September 2022; October-December 2022; January-to date February 2023.



#### 3.8.13 Extraction Rate

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

The organization keep an up-to-date record of the FFB volume received (certified and non-certified), CPO and PK produced (certified and non-certified) over a period of twelve (12) month, as in "Supply Chain Mass Balance".

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

Mass balance record available for 3-monthly period: April-June 2022; July-September 2022; October-December 2022; January-to date February 2023 – based on the OER and KER proportion from the certified and non-certified FFB. Summary of production and mass balance:

2023 (to date February) Description 2022 112,979.15 13,730.55 FFB Certified (MT) FFB Non-Certified (MT) 950.02 7,098.42 CPO (MT) 28,874.73 3,064.03 CPO Non-certified (MT) 2,305.41 196.89 PK (MT) 4,775.30 543.37 PK Non-certified (MT) 442.69 34.93 OER (%) 22.07 22.28 4.24 3.95 KER (%)

Complied

3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	The actual conversion ratio is monitored on daily basis through sounding result and documented in daily report. Based on "Laporan Produksi" dan "Working Sheet Extraction" dated 28 February 2023, the sounding result and production report shows that actual conversion ratios from FFB into CPO and PK are:  Working Sheet Oil Extraction:  a. CPO production todate 1,456.10 kg;  b. OER todate 21.91%  Working Sheet Kernel Extraction:  a. CPK production todate 255.81 kg;  b. KER todate 3.85%	Complied
3.8.15	Processing  For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.	Audit team verifies through documented procedures and record keeping that Sekunyir POM is only processing certified FFB into production of certified CSPO and CSPK. The mill implementing mass balance module.  Sekunyir Palm Oil Mill has 2 weighbridges that uses for weighing palm product, both have been calibrated based on:  - "Keterangan Hasil Pengujian" No.510.3/118/DPPKUKM.3/SKHP dated 22 February 2023, issued by "Dinas Perindustrian, Perdagangan, Koperasi, Usaha Kecil dan Menengah Kabupaten Kotawaringin Barat" for weighbridge brand: GSC; Type GST-9700; Serial Number 11099707; Capacity 50,000 kg; verified on 15 February 2023. Due for next verification on 15 February 2024.  - "Keterangan Hasil Pengujian" No.510.3/1173/DPPKUKM.3/SKHP dated 24 November 2022, issued by "Dinas Perindustrian, Perdagangan, Koperasi, Usaha Kecil dan Menengah Kabupaten Kotawaringin Barat" for weighbridge brand: Metler Toledo; Type IND 560; Serial Number 445226681; Capacity 50,000 kg; verified on 10 November 2022. Due for next verification on 10 November 2023.	Complied



3.8.16	<ul> <li>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.</li> <li>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.</li> </ul>	<ul> <li>Shipping Announcement Transaction ID TR-d6911924-c599. Seller: Sime Darby Plantation – Sekunyir POM, PT ITH. Member ID: RSPO_PO1000000321. Buyer: PT Teguh Sempurna – Pemantang KCP. Member ID: RSPO_PO1000004688. Product name: CSPK. Supply Chain Model: Mass Balance. Volume 350.71 MT. Contract No. 00249/ITH/KTR-KERNEL/LOK/IX/2022; Shipping date 30/09/2022. B/L Number N/A (trucking). Confirmation date 17/01/2023.</li> <li>Shipping Announcement Transaction ID TR-e5f26184-a961. Seller: Sime Darby Plantation – Sekunyir POM, PT ITH. Member ID: RSPO_PO1000000321. Buyer: PT Teguh Sempurna – Pemantang KCP. Member ID: RSPO_PO1000004588. Product name: CSPK. Supply Chain Model: Mass Balance. Volume 328.28 MT. Contract No. 00254/ITH/KTR-KERNEL/LOK/I/2023; Shipping date 30/01/2023. B/L Number N/A (trucking). Confirmation date 21/02/2023.</li> <li>Audit team checked the PalmTrace account of PT. Indotruba Tengah, for Credit Allocation, as follows:</li> </ul>	Complied
		<ul> <li>Credit Allocation with transaction ID ST-TR-e01f5ca8-b7da; Product CSPO; Supply Chain Model Identity Preserved; Volume allocated as credit 20.000 MT; Credit Type: CSPO Credit; Equivalent Credits: 29.000; Allocation Date: 31/03/2022.</li> <li>Since the CH sold more than 500 MT credit, the CH eligible for Book and Claim audit.</li> </ul>	
3.8.17	Claims The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.	PT. Indotruba Tengah – Sekunyir POM only makes claims on RSPO Certified product in compliance with RSPO Rules on Market Communications and Claims. Statement of RSPO certified and Mass Balance are only stated in sales documents of RSPO certified product.	Complied

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. Indotruba Tengah-Sekunyir POM is subsidiary of Sime Darby Plantation Berhad.  Sime Darby Plantation Berhad, the parent company of PT. Indotruba Tengah is highlighting their commitment to the principles of RSPO. The corporate communication can be found at <a href="https://www.simedarbyplantation.com">https://www.simedarbyplantation.com</a> .	Complied
4.2	<ul> <li>In corporate communications a member is allowed to:</li> <li>Display its RSPO membership status</li> <li>Display the RSPO web address (www.rspo.org)</li> <li>State that the member supports the work of the RSPO</li> <li>State the member's history with regard to the RSPO.</li> <li>Use the RSPO trademark to promote its membership of the RSPO.</li> <li>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.</li> </ul>	Sime Darby Plantation Berhad, in its website:  a. Display its RSPO membership status: No, Sime Darby Plantation Berhad did not display its RSPO membership status. The parent company stated "22 SOUs in Indonesia have received the RSPO certification while the rest were audited for certification"  b. Display the RSPO web address: No.  c. State the member supports the work of the RSPO: Not in direct manner. In the website, Sime Darby Plantation Berhad stated "As a vertically integrated palm oil company, the majority of the palm products processed by our refineries originate from Sime Darby Plantation (SDP) mills which are certified to the Roundtable on Sustainable Palm Oil (RSPO)."  d. State the member's history with regards to the RSPO: Not in direct manner.  e. Use of RSPO Trademark to promote its membership of the RSPO: No, Sime Darby Plantation Berhad, did not use RSPO trademark in its corporate communication such in website.	Complied
4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	No, Sime Darby Plantation Berhad 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.	No, Sime Darby Plantation Berhad 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. Indotruba Tengah – Sekunyir POM's 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.	No, Sime Darby Plantation Berhad did not display its RSPO Corporate Logo in any document.	Complied
Busine	ss 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 is no use of RSPO trademark and/or RSPO corporate logo in business-to-business communication related to RSPO certified product; between PT. Indotruba Tengah-Sekunyir 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. Indotruba Tengah - Sekunyir POM followed the requirements of the RSPO SCCS. PT. Indotruba Tengah - Sekunyir 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:	PT. Indotruba Tengah - Sekunyir POM is not a distributor and/or wholesaler.  Not applicable.	Not Applicable
	a) If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer's SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.		

	b) If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.		
5.4	A certified member can provide information to its customers detailing the presence of certified palm oil contained within a product even if it is not eligible for a product-specific under RSPO rules. The end product must not be labelled as certified or sold in such a way that implies RSPO certification.  For example, a retailer or food service company may require	PT. Indotruba Tengah - Sekunyir POM is not producing or selling end-product to consumer. No labelling on product sighted, and verified.  Not applicable.	Not Applicable
	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.		
MODUL	E B – MASS BALANCE SPECIFIC RULES		
Minimu	m Mass Balance content		
	95% or above of the oil palm content must be RSPO MB-certified.	The MB volume that can be sold is only the volume requested in the PalmTrace. Hence the CPO volume sold under MB model is considered 100% content.	Complied
	Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.	The MB volume that can be sold is only the volume requested in the PalmTrace. Hence the CPO volume sold under MB model is considered 100% content.	Complied
Labellin	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		Complied
Labellin	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.	Hence the CPO volume sold under MB model is considered 100% content.	Complied  Not Applicable

#### RSPO P&C Public Summary Report Revision 14 (Aug 2022)

• 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. Messaging (MB) Messaging ALLOWED in storytelling in product-related There is no product partial claims Not Applicable communications includes: • [Oil palm products]/[palm oil]/[palm kernel oil] from RSPO-certified mills and plantations were mixed with noncertified 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

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	oil or palm kernel oil produced by RSPO certified mills and plantations.  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.  Messaging NOT ALLOWED in storytelling in product-related communications:  Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product.		
_	4: Respect community and human rights and deliver b		
•	ommunity rights, provide equal opportunities, maximise benefit	• •	
Criteria 4	<b>4.1:</b> The unit of certification respects human rights, which inclu	ides respecting the rights of Human Rights Defenders.	
4.1.1	<b>(C)</b> 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	rights, that prohibits intimidation and harassment including prohibiting retaliation against Human Rights Defenders (HRD) referring to Human Rights Charter ( <i>Piagam Hak Asasi</i> ) of Sime Darby Plantation of 2020. The policy has explained, that company committed to protecting human right of all staff and	Complied
	security forces.	The human rights protection policy has been communicated to workers and surrounding communities from villages, 17 July 2022. 30 persons from external parties, such as from Pangkalan Banteng district, Hanau district, Amin Jaya village, Sungai Pakit village attended.	
		The dissemination also has been conducted through morning briefing of workers and signbords/posters in the office, workplaces, and housing of Mill and Estates. Evident through interview with sampled harvester in Sekunyir Estate and sprayer in Seruyan Estate, they understand the implementation of protection of human rights during operation.	

### RSPO P&C Public Summary Report Revision 14 (Aug 2022)

4.1.2	The unit of certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations.	In Human Rights Charter ( <i>Piagam Hak Asasi</i> ) year 2020, document is stating that the company will not use any form of harassment, including the use of mercenaries and paramilitaries in its operations.  Stakeholder interview Sungai Pakit village and Amin Jaya village stated that company did not use violence to resolve issue.	Complied
Criteria	<b>4.2:</b> There is a mutually agreed and documented system for de	ealing with complaints and grievances, which is implemented and accepted by all af	fected parties.
4.2.1	<b>(C)</b> 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.	Grievance Resolution of Stakeholder (No. 01/MPK-OU/XII/21 dated 01 December 2021). The SOP has included timing to respond the grievance (max 14 days), to ensure the anonymity of any party if requested, and grievance	Complied
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.	, , , , , , , , , , , , , , , , , , , ,	Complied
4.2.3	The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the		Complied

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### RSPO P&C Public Summary Report Revision 14 (Aug 2022)

	stakeholders.	(tend to be a conflict) from the workers or external stakeholder, but common issues like housing reparation or bad road condition that have always been followed up.	
		For instance, request recorded in Buku Keluhan/Informasi Stakeholder.	
		- On 25 October 2022 company received request from Regeny Kotawaringin Barat to donate for victim of natural disaster.	
		- Responded and reported "Berita Acara Serah Terima Pemberian Paket Sembako" from PT. Indotruba Tengah to "Badan Penanggulangan Bencana Daerah" dated 1 November 2022 in form of 200 packages food and supply, worth Rp.200,000,000.	
4.2.4	The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.	covered that if the cases cannot be handled at Estate/Mill level, the cases will be escalated to the next level of management, using mediator, or to be escalated to the court or RSPO website (complaint panel).	Complied
		The document sighted that the external complaints resolution can be involved with third party mediator.	
Criteria 4	4.3: The unit of certification contributes to local sustainable de	velopment as agreed by local communities.	
4.3.1	Contributions to community development that are based on the results of consultation with local community are demonstrated.	The CSR program year 2023 has been communicated to surrounding communities from villages, 17 July 2022. The meeting including gathering information for preparing CSR program year 2023. 30 persons from external parties, such as from Pangkalan Banteng district, Hanau district, Amin Jaya village, Sungai Pakit village participated.	Complied
		The company utilized Social Impact Assessment (SIA) including its Management and Monitoring Plan as well as participatory regular review to identify positive and negative impacts of company's operational activities, and to identify communities need to address its negative impact and to improve community wellbeing.	
		The activity then programmed in Annual Corporate Social Responsibility (CSR) Program. The company has shown the CSR Program of 2023 includes the	

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		aspects of education, public health, religion, social and sports, environmental, culture.		
Criteria	Criteria 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.			
4.4.1	(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed (FPIC) process. Documents related to the history of land tenure and the actual legal or customary use of the land are available.	<ul> <li>Unit of certification is able to demonstrate legal ownership in form of land title or HGU for all managed land/area. Total managed area covers 7,734.60 Ha, details as below:</li> <li>HGU number 04/1988, covered 3,260 Ha – valid until 24 September 2033, based on "Surat Keputusan Menteri Negara Agraria / Kepala Badan Pertanahan Nasional" No 152/HGU/BPN/97, dated 26 September 1997</li> <li>HGU number 05/1988, covered 829.2 Ha – valid until 24 September 2033, based on "Surat Keputusan Menteri Negara Agraria / Kepala Badan Pertanahan Nasional" No 11/HGU/BPN/99, dated 11 April 1998</li> <li>HGU number 05/1988, covered 740.4 Ha – valid until 23 June 2033, based on "Surat Keputusan Menteri Negara Agraria / Kepala Badan Pertanahan Nasional" No 10/HGU/BPN/98, dated 2 April 1998</li> <li>HGU number 06/1988, covered 2,905 Ha – valid until 23 June 2033, based on "Surat Keputusan Menteri Negara Agraria / Kepala Badan Pertanahan Nasional" No 13/HGU/BPN/98, dated 2 April 1998</li> <li>The land title of HGU PT. Indotruba Tengah attached with map scale 1:100,000. Documents related to the history of land tenure and the actual legal use of the land described in "Risalah Pemeriksaan Tanah B".</li> </ul>	Complied	
4.4.2	Copies documents evidencing agreement- making processes and negotiated agreements detailing the FPIC process are available and include:  4.4.2a Evidence that a plan has been developed through consultation and discussion held in good faith with all affected groups within the community, with specific assurances that vulnerable, minority and gender groups are	According to the information given in "Risalah Pemeriksaan Tanah B No.01/PPTB/I/1995" dated 12 January 1995", No.02/PPTB/I/1995" dated 12	Complied	



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.	Ownership and has no customary or indigenous rights upon the land. Government planning categorized several pieces of the land as transmigration programs, but the program was cancelled.  Evidence that a plan has been developed through consultation and discussion held in good faith with all affected groups within the community and relevant government also informed in the "Risalah Pemeriksaan Tanah B" document.
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;	The unit of certification has respected communities to give or withhold their consent to the operations at the time are clearly informed in the "Risalah Pemeriksaan Tanah B" document as detail below:
	- "Risalah Panitia Pemeriksaan Tanah "B" No.01/PPTB/I/1995" dated 12 January 1995, Section A the land allocated through "Surat Keputusan Gubernur Kepala Daerah Tingkat I Kalimantan Tengah No.525.26/12/BPN" dated 10 June 1993, location Pangkalan Banteng village, Kumai District, Kotawaringin Barat Regency, Kalimantan Tengah Province of 1,622 Ha. Section D stated on the land, there was no land use by community.
	- "Risalah Panitia Pemeriksaan Tanah "B" No.02/PPTB/I/1995" dated 12 January 1995, Section A the land allocated through "Surat Keputusan Gubernur Kepala Daerah Tingkat I Kalimantan Tengah No.525.26/120/BPN" dated 10 June 1993, location Pembuang Hulu II village, Hanau District, Kotawaringin Timur Regency, Kalimantan Tengah Province of 1,281 Ha. Section D stated on the land, there was no land use by community.
	"Risalah Panitia Pemeriksaan Tanah "B" No.006/PPTB/VIII/93" dated 7 August 1993, Section A the land allocated through "Surat Keputusan Gubernur Kepala Daerah Tingkat I Kalimantan Tengah No.525.26/12/BPN" dated 10 June 1993, location Pembuang Hulu II village, Hanau District, Kotawaringin Timur Regency, Kalimantan Tengah Province of 5,000 Ha. Section D stated on the land, there was no land use by community.



	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.	Jaya villagers, explained that the plantation of PT. Indotruba Tengah was allocated for transmigration project by government but cancelled. During that period, since the land was allocated by government on state land; and no village	
4.4.3	(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).	No changes on legal document, including the maps of certification unit.  PT. Indotruba Tengah - Sekunyir POM has legal ownership – Land Title (HGU), which consists of 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, which issued by Directorate of Measurement and Mapping of National Land Agency (BPN).  PT. Indotruba Tengah demonstrated land title/Land Use Right (HGU), issued by Minister of Agrarian and Chief of National Land Agency – presented in four HGU certificate documents, total 7,734.60 Ha:  - HGU number 04/1988, covered 3,260 Ha – valid until 24 September 2033, based on "Surat Keputusan Menteri Negara Agraria / Kepala Badan Pertanahan Nasional" No 152/HGU/BPN/97, dated 26 September 1997  - HGU number 05/1988, covered 829.2 Ha – valid until 24 September 2033, based on "Surat Keputusan Menteri Negara Agraria / Kepala Badan Pertanahan Nasional" No 11/HGU/BPN/99, dated 11 April 1998  - HGU number 05/1988, covered 740.4 Ha – valid until 23 June 2033, based on "Surat Keputusan Menteri Negara Agraria / Kepala Badan Pertanahan Nasional" No 10/HGU/BPN/98, dated 2 April 1998  - HGU number 06/1988, covered 2,905 Ha – valid until 23 June 2033, based on "Surat Keputusan Menteri Negara Agraria / Kepala Badan Pertanahan Nasional" No 13/HGU/BPN/98, dated 2 April 1998  The land title with HGU PT. Indotruba Tengah map scale 1: 100,000.	Complied

4.4.4	All relevant information is available in appropriate forms and languages, including assessment of impact, proposed benefit sharing, and legal arrangements.	As explained in previous indicator 4.4.1 shown that PT. Indotruba Tengah - Sekunyir POM has legal ownership — Land Title (HGU). All relevant documents are available, including the "Risalah Pemeriksaan Tanah B" document is in Bahasa.	Complied
4.4.5	<b>(C)</b> 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.	Evidence to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose is available in the "Risalah Pemeriksaan Tanah B" document where representative of affected parties have signed in the document.	Complied
4.4.6	There is evidence that implementation of agreement negotiated through FPIC is annually reviewed in consultation with affected parties.	According to the information given in "Risalah Pemeriksaan Tanah B No.01/PPTB/I/1995" dated 12 January 1995", No.02/PPTB/I/1995" dated 12 January 1995 and No.006/PPTB/VIII/93" dated 7 August 1993 the land is State Ownership and has no customary or indigenous rights upon the land. Government planning categorized several pieces of the land as transmigration programs, but the program was cancelled.	Complied
		Then, no negotiated agreement or FPIC for land compensation.	
		here it can be demonstrated that there are legal, customary or user rights, without r stakeholders to express their views through their own representative institutions.	their FPIC. This
4.5.1	<b>(C)</b> Documents showing identification and assessment of demonstrable legal, customary and user rights are available.	Identification and assessment of demonstrable legal, customary and user rights are clearly described in the "Risalah Pemeriksaan Tanah B" document.  Referred to the updated area statement 2023 and interviews with management and Plantation Agency, it is clear informed that no new plantings after 1 January	Not Applicable
		2010. The new development within operational area were conducted in 1993, 1994,	
		1995, and 1996. For plantings after 1996 (2013 and onwards) were replanting.	

		Due to the failure of the transmigration program, the government offered the land to investors. Therefore, there was no land acquisition process to the individual landowners or customary rights and no FPIC related process.  Based on these descriptions, this Criterion 4.5 related New Planting and FPIC process are not applicable.	
4.5.2	<b>(C)</b> 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.	There is no new planting in operational area based on explanation of Indicator 4.5.1. Therefore, this Criterion 4.5 related New Planting and FPIC process are not applicable.	Not Applicable
4.5.3	Evidence is available that affected local peoples understand they have the right to say 'agree' or 'not agree' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.	There is no new planting in operational area based on explanation of Indicator 4.5.1. Therefore, this Criterion 4.5 related New Planting and FPIC process are not applicable.	Not Applicable
4.5.4	To ensure local food and water security and as part of the FPIC process, SEIA participation and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of land allocations process.	There is no new planting in operational area based on explanation of Indicator 4.5.1. Therefore, this Criterion 4.5 related New Planting and FPIC process are not applicable.	Not Applicable

4.5.5	Evidence is available that the affected communities and rights holders have had the option to access information and advice, that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.	There is no new planting in operational area based on explanation of Indicator 4.5.1. Therefore, this Criterion 4.5 related New Planting and FPIC process are not applicable.	Not Applicable
4.5.6	Evidence is available that the communities or their representatives gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.	There is no new planting in operational area based on explanation of Indicator 4.5.1. Therefore, this Criterion 4.5 related New Planting and FPIC process are not applicable.	Not Applicable
4.5.7	After 15 November 2018, new lands will not be acquired for plantations and mills as a result of recent (after November 2005) expropriations in the national interest (eminent domain) without FPIC process, except in cases of smallholders benefitting from agrarian reform or anti-drug programmes.	There is no new planting in operational area based on explanation of Indicator 4.5.1. Therefore, this Criterion 4.5 related New Planting and FPIC process are not applicable.	Not Applicable
4.5.8	<b>(C)</b> New lands are not acquired in areas inhabited by communities in voluntary isolation.	There is no new planting in operational area based on explanation of Indicator 4.5.1. Therefore, this Criterion 4.5 related New Planting and FPIC process are not applicable.	Not Applicable
	<b>4.6:</b> Any negotiations concerning compensation for loss of leg ocal communities and other stakeholders to express their view	al, customary or user rights are dealt with through a documented system that end s through their own representative institutions.	ables indigenous
4.6.1	<b>(C)</b> A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.	Based on explanation on Criterion 4.5, has mentioned that there is no land acquisition to individual landowner or customary rights in HGU granting process. After Unit of certification was granted of HGU in 1997 and 1998, Unit of certification did not conduct any land development/land acquisition. Until present, Unit of certification also has no plan to conduct any new land expansion in the near future.  A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation are covered within	Complied



		SOP of Land Acquisition (No. 343/PSD-OKUP/11 dated 23 February 2012) if there is any land development/acquisition in the future. The procedure has covered land title and owner (male/female) identification, FPIC process, and fair land compensation/payment.	
4.6.2	<b>(C)</b> 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.	No changes of the relevant procedure.  The mutually agreed procedure for calculating and distributing fair and gender-equal compensation have been covered in the SOP of Land Acquisition (No. 343/PSD-OKUP/11 dated 23 February 2012). The procedure has covered land title and owner (male/female) identification, FPIC process, and fair land compensation/payment.	Complied
4.6.3	Evidence is available that equal opportunities are provided to both men and women to hold land titles for smallholdings (if possible based on local law, customs and/or agreement).	Based on explanation from Criterion 4.5 and Indicator 4.6.1, there was no land acquisition from individual landowner or customary right since the HGU granting process until present.  Therefore, this indicator is not applicable.	Not Applicable
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.	Based on explanation from Criterion 4.5 and Indicator 4.6.1, there was no land acquisition from individual landowner or customary right since the HGU granting process until present.  Therefore, this indicator is not applicable.	Not Applicable
	<b>4.7:</b> Where it can be demonstrated that local peoples have ment of rights, subject to their FPIC and negotiated agreement	e legal, customary or user rights, they are compensated for any agreed land ts.	acquisitions and
4.7.1	<b>(C)</b> A mutually agreed procedure for identifying people entitled to compensation is in place.	a procedure for identifying people entitled to compensation are covered within	Complied
4.7.2	<b>(C)</b> A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.	SOP of Land Acquisition (No. 343/PSD-OKUP/11 dated 23 February 2012). Please refer to indicator 4.6.1 above	Not Applicable

4.7.3	Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.	According to the information given in "Risalah Pemeriksaan Tanah B No.01/PPTB/I/1995" dated 12 January 1995", No.02/PPTB/I/1995" dated 12 January 1995 and No.006/PPTB/VIII/93" dated 7 August 1993 the land is State Ownership and has no customary or indigenous rights upon the land. Government planning categorized several pieces of the land as transmigration programs, but the program was cancelled.	Not Applicable
		No land compensation was made.	
Criteria rights.	<b>4.8:</b> The right to use the land is demonstrated and is not legit	timately contested by local people who can demonstrated that they have legal cus	stomary, or user
4.8.1	Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.	document and map, this area is part of the land title HGU Certificate No. 5 of 1998 and No. 6 of 1998, or in the southern boundary of blocks G25, G28, G31	Complied
4.8.2	<b>(C)</b> 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.	<ul> <li>Unit of certification started to develop the plantation gradually in 1993, 1994, 1995, and 1996 after granted Location Permit.</li> <li>The development was not finished yet in 1996.</li> <li>Unit of certification was granted by HGU Decree in 1997 and 1998.</li> <li>Just after granted of HGU, there was a national and global monetary crisis in 1998. The ongoing development in that time was postponed due to the</li> </ul>	Complied
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4).	<ul> <li>lack of financing.</li> <li>For the areas that not yet felled, and some areas that had been planted by oil palm, occupied by some communities (Group of H. Ruslan ± 486 Ha and others individuals ± 139 Ha).</li> </ul>	Complied



	T- 40.0 10.0 10.0 10.0 10.0 10.0 10.0 10.0		
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring	<ul> <li>Participatory identification, mapping, and verification have been conducted.</li> <li>H. Ruslan and other occupants stated that the land acquired by acquisition from previous landowners.</li> </ul>	Complied
	communities where applicable).	- Due to PT Indotruba Tengah acquired the land from government (unsuccessful transmigration program), whereas H. Ruslan acquired the land from land compensation to the individual landowners, it seems that both parties have an equal justification of the land ownership status.	
		<ul> <li>On 27 July 2011, the Agrarian Agency came to PT Indotruba Tengah to discuss the disputed area and asked whether the land initially abandoned by Unit of certification or occupied by the communities.</li> </ul>	
		- On 31 November 2011, had been conducted land verification by Agrarian Agency, Plantation Agency, and PT Indotruba Tengah. In this moment, PT Indotruba Tengah asked Agrarian Agency to appoint this area as abandoned area, so that Unit of certification has no obligation to pay the land taxes.	
		- During this moment, Unit of certification ever considered to put this case to the court. However, considering negative social impact that might predicted in that time (the tense has increased), Unit of certification postponed the plan.	
		Progress updated during ASA 2_1, year 2023:	
		• In accordance with the explanation of indicator 4.5.1, that based on review of legality documents (HGU Decree, HGU Certificate and <i>Risalah Panitia B</i> ) and interview with management, Village Heads and Plantation Agency, it is found that the HGU areas were came from government land bank that initially was purposed for transmigration program. Due to the failure of the transmigration program, the government offered the land to investors.	
		• Land disputed of the certification unit legal managed area are still same from previous assessment issues. The land dispute located in Seruyan Estate covers 807.31 Ha. As a legal document and map, this area is part of the land title HGU Certificate No. 5 of 1998 and No. 6 of 1998, or in the southern boundary of blocks G25, G28, G31 and G34.	

		<ul> <li>Unit of certification did not continue this case considering negative social impact that might happen, even though Unit of certification must pay this disputed land taxes annually.</li> <li>Based on field observation to these disputed areas, can be concluded that the area has been participatory mapped and well demarcated, both occupant and Unit of certification did not disturb each other. Therefore, there is no conflict in the field currently. It is also has been verified based on interview with Villages Heads and Plantation Agency.</li> <li>The certification unit planned that the dispute land will remove from managed area when renewal process of land title in year 2033 (land title expired).</li> </ul>	
_	e 5: Support smallholder inclusion mallholders in RSPO supply chains and improve their livelihoods	s through fair and transparent partnerships.	
Criteria !	<b>5.1:</b> The unit of certification deals fairly and transparently with	all smallholders (Independent and Scheme) and other local businesses.	
5.1.1	Current and previous period prices for FFB are publicly available and accessible by smallholders.	PT. Indotruba Tengah – Sekunyir POM received FFB from non-certified oil palm plantation company PT. Indotruba Timur (ITR)	Not Applicable
		PT. Indotruba Tengah - Sekunyir POM does not receive and process FFB from smallholder.	
		Not applicable	
5.1.2	<b>(C)</b> Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.	PT. Indotruba Tengah – Sekunyir POM received FFB from non-certified oil palm plantation company PT. Indotruba Timur (ITR)	Not Applicable
		PT. Indotruba Tengah - Sekunyir POM does not receive and process FFB from smallholder.	
		Not applicable	
5.1.3	<b>(C)</b> Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.	PT. Indotruba Tengah — Sekunyir POM received FFB from non-certified oil palm plantation company PT. Indotruba Timur (ITR)	Not Applicable

		PT. Indotruba Tengah - Sekunyir POM does not receive and process FFB from smallholder.  Not applicable	
5.1.4	<b>(C)</b> 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.	PT. Indotruba Tengah – Sekunyir POM received FFB from non-certified oil palm plantation company PT. Indotruba Timur (ITR) PT. Indotruba Tengah - Sekunyir POM does not receive and process FFB from smallholder. Not applicable	Not Applicable
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe.	PT. Indotruba Tengah - Sekunyir POM does not receive and process FFB from smallholder.  However, PT. Indotruba Tengah demonstrate contract with local contractor: Contract of FFB transport as per "Surat Perjanjian Kerja PT Indotruba Tengah – CV Hanau Jaya Sejahtera No. SKE/SPK-LKL/I/2023/002" dated 1 January 2023 – Section 3 stipulated timeframe of contract, Section 4 stipulate the piece rate/service price per distance coverage, Section 6 stipulate payment period and method.	Complied
5.1.6	(C) Agreed payments are made in a timely manner and receipts specifying price, weigh, deductions and amount paid are given.	PT. Indotruba Tengah - Sekunyir POM does not receive and process FFB from smallholder.  However, PT. Indotruba Tengah demonstrate contract with local contractor: Contract of FFB transport as per "Surat Perjanjian Kerja PT Indotruba Tengah – CV Hanau Jaya Sejahtera No. SKE/SPK-LKL/I/2023/002" dated 1 January 2023. Sample payment:  - Invoice from CV Hanau Jaya Sejahtera to PT. Indotruba Tengah No.001/CVHJS/I/2023 based on contract No. SKE/SPK-LKL/I/2023/002; dated 3 January 2023;  Bank payment voucher No.BKS/009/SKE/2/2023 dated 20 February 2023.	Complied

Sekunyir Palm Oil Mill has 2 weighbridges that uses for weighing palm product, both have been calibrated based on:  "Keterangan Hasil Pengujian" No.510.3/118/DPPKUKM.3/SKHP dated 22 February 2023, issued by "Dinas Perindustrian, Perdagangan, Koperasi, Usaha Kecil dan Menengah Kabupaten Kotawaringin Barat" for weighbridge brand: GSC; Type GST-9700; Serial Number 11099707; Capacity S0,000 kg; verified on 15 February 2023. Due for next verification on 15 February 2024.  "Keterangan Hasil Pengujian" No.510.3/1173/DPKUKM.3/SKHP dated 24 November 2022, issued by "Dinas Perindustrian, Perdagangan, Koperasi, Usaha Kecil dan Menengah Kabupaten Kotawaringin Barat" for weighbridge brand: Metter Toledo; Type IND 560; Serial Number 445226681; Capacity 50,000 kg; verified on 10 November 2022. Due for next verification on 10 November 2023.  The unit of 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 (ICS), who holds the certification, and who owns and sells (ICS), who holds the certification and the smallholders, and all grievances raised are dealt with in a timely manner.  Sexunyir POM received FFB from non-certified oil palm plantation company PT. Indotruba Tengah - Sekunyir POM does not receive and process FFB from smallholders, and all grievances raised are dealt with in a timely manner.  PT. Indotruba Tengah - Sekunyir POM received FFB from non-certified oil palm plantation company PT. Indotruba Timur (ITR) PT. Indotruba Tengah - Sekunyir POM received FFB from non-certified oil palm plantation company PT. Indotruba Tengah - Sekunyir POM does not receive and process FFB from smallholders, and all grievances raised are dealt with in a timely manner.  Not applicable	5.1.7	Weighing equipment is verified by an independent third party on a regular basis.	Entire weighbridge has been calibrated by related government agencies according to national regulation (cooperative and industry agency of Kalimantan Tengah Province).	Complied
February 2023, issued by "Dinas Perindustrian, Perdagangan, Koperasi, Usaha Kecil dan Menengah Kabupaten Kotawaringin Barat" for weighbridge brand: GSC; Type GST-9700; Serial Number 11099707; Capacity 50,000 kg; verified on 15 February 2023. Due for next verification on 15 February 2024.  **Keterangan Hasil Pengujian" No.510.3/1173/DPPKUKM.3/SKHP dated 24 November 2022, issued by "Dinas Perindustrian, Perdagangan, Koperasi, Usaha Kecil dan Menengah Kabupaten Kotawaringin Barat" for weighbridge brand: Metler Toledo; Type IND 560; Serial Number 445226681; Capacity 50,000 kg; verified on 10 November 2022. Due for next verification on 10 November 2023.  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.  The unit of certification has a grievance mechanism for smallholders, and all grievances raised are dealt with in a timely manner.  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.  The unit of certification has a grievance mechanism for smallholders, and all grievances raised are dealt with in a timely manner.  The unit of certification has a grievance mechanism for smallholders, and all grievances raised are dealt with in a timely manner.  The unit of certification has a grievance mechanism for smallholders, and all grievances raised are dealt with in a timely manner.				
November 2022, issued by "Dinas Perindustrian, Perdagangan, Koperasi, Usaha Kecil dan Menengah Kabupaten Kotawaringin Barat" for weighbridge brand: Metler Toledo; Type IND 560; Serial Number 445226681; Capacity 50,000 kg; verified on 10 November 2022. Due for next verification on 10 November 2023.  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.  The unit of certification supports Independent smallholders 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.  Not applicable  T. Indotruba Tengah - Sekunyir POM does not receive and process FFB from smallholders, and all grievances raised are dealt with in a timely manner.  PT. Indotruba Tengah - Sekunyir POM received FFB from non-certified oil palm plantation company PT. Indotruba Timur (ITR) PT. Indotruba Tengah - Sekunyir POM does not receive and process FFB from smallholder.			February 2023, issued by "Dinas Perindustrian, Perdagangan, Koperasi, Usaha Kecil dan Menengah Kabupaten Kotawaringin Barat" for weighbridge brand: GSC; Type GST-9700; Serial Number 11099707; Capacity 50,000 kg;	
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.  (C) The unit of certification has a grievance mechanism for smallholders, and all grievances raised are dealt with in a timely manner.  PT. Indotruba Tengah - Sekunyir POM received FFB from non-certified oil palm plantation company PT. Indotruba Timur (ITR)  PT. Indotruba Tengah - Sekunyir POM does not receive and process FFB from smallholder.  PT. Indotruba Tengah - Sekunyir POM does not receive and process FFB from smallholder.			November 2022, issued by "Dinas Perindustrian, Perdagangan, Koperasi, Usaha Kecil dan Menengah Kabupaten Kotawaringin Barat" for weighbridge brand: Metler Toledo; Type IND 560; Serial Number 445226681; Capacity 50,000 kg; verified on 10 November 2022. Due for next verification on 10	
smallholder on who runs the Internal Controlling System (ICS), who holds the certificate, and who owns and sells certified materials.  (C) The unit of certification has a grievance mechanism for smallholders, and all grievances raised are dealt with in a timely manner.  (C) The unit of certification has a grievance mechanism for plantation company PT. Indotruba Tengah – Sekunyir POM received FFB from non-certified oil palm plantation company PT. Indotruba Timur (ITR)  PT. Indotruba Tengah – Sekunyir POM does not receive and process FFB from smallholder.	5.1.8	with certification, where applicable, ensuring mutual	plantation company PT. Indotruba Timur (ITR)	Not Applicable
smallholders, and all grievances raised are dealt with in a timely manner.  plantation company PT. Indotruba Timur (ITR)  PT. Indotruba Tengah - Sekunyir POM does not receive and process FFB from smallholder.		smallholder on who runs the Internal Controlling System (ICS), who holds the certificate, and who owns and sells	smallholder.	
smallholder.	5.1.9	smallholders, and all grievances raised are dealt with in a		Complied
Not applicable		timely manner.	·	
			Not applicable	



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5.2.1	The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification.	PT. Indotruba Tengah demonstrates working plan to assist smallholder "PT. Indotruba Tengah Action Plan Pembangunan Kebun Plasma 1,500 Ha", dated 10 January 2022. Based on the smallholder invitation and commitment to develop smallholder with surrounding villages, PT. Indotruba Tengah update the smallholder development plan 2023, dated 22 February 2023:  - Seedling order April 2023	Complied
		- Land preparation review and approval March 2023	
		- Land preparation (incl. contractor appointment, award letter, contract) April 2023	
		- Land clearing (incl. felling, debolling, stacking, field drain construction, cambering) April 2023	
		- Planting – May 2023	
		Progress implementation:	
		"Notulen Survey Calon Lahan Fasilitasi Kebun Masyarakat (Plasma)" dated 2 February 2022. The land survey carried out on Sidomulyo village with community and farmer group attending. There are 250 members with 2 Ha oil palm plantation each, totalling 500 Ha, ex-PIR-Trans PTPN XIII. Currently the smallholders are in process registering the land for land certificate (PTSL). Other discussion related to plantation costing. The area has been mapped.	
		<ul> <li>Communication and socialization of smallholder program to Sungai Hijau village, Pangkalan Banteng district "Sosialisasi KKPA Desa Sungai Hijau" dated 15 February 2023. The socialization attended by 84 community members (male and female).</li> </ul>	
		- Identification and summary of potential plan for smallholder development "Rekapitulasi Penyerahan Calon Petani Plasma KKPA Desa Sungai Hijau", total 169.66 Ha.	



5.2.2	The unit of certification develops and implements livelihood improvement programmes, including at least capacity building to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder).	PT. Indotruba Tengah demonstrates working plan to assist smallholder, as of audit date, verified Communication and socialization of smallholder program to Sungai Hijau village, Pangkalan Banteng district "Sosialisasi KKPA Desa Sungai Hijau" dated 15 February 2023. The socialization attended by 84 community members (male and female).	Complied
	Strainfolder).	The meeting and survey were to determine the interest and to agreed smallholder development cost and benefit sharing.	
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	PT. Indotruba Tengah demonstrates working plan to assist smallholder, as of audit date, verified through identification and summary of potential plan for smallholder development "Rekapitulasi Penyerahan Calon Petani Plasma KKPA Desa Sungai Hijau", total 169.66 Ha.	Complied
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	PT. Indotruba Tengah does not have scheme smallholder in its supply base. This indicator is not applicable.	Not Applicable
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	PT Indotruba Tengah has regularly review and publicly report on the progress of smallholder support program to Plantation Agency (Dinas Perkebunan) in Kotawaringin Barat Regency.	Complied
		1. Sample progress of smallholders support program: Conducting survey for smallholder's land, as per recorded: "Notulen Survey Calon Lahan Fasilitasi Kebun Masyarakat (Plasma)" dated 2 February 2022. The land survey carried out on Sidomulyo village with community and farmer group attending. There are 250 members with 2 Ha oil palm plantation each, ex-PIR-Trans PTPN XIII.	
		2. In 2023, PT. Indotruba Tengah demonstrates working plan to assist smallholder, as of audit date, verified through identification and summary of potential plan for smallholder development "Rekapitulasi Penyerahan Calon Petani Plasma KKPA Desa Sungai Hijau", total 169.66 Ha.	

#### Principle 6: respect workers' rights and conditions

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

Criteria	<b>6.1:</b> Any form of discrimination is prohibited.		
6.1.1	<b>(C)</b> A publicity available non-discrimination and equal opportunity policy is implemented in such way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.	No changes to the policy.  Unit of certification has established the policy of equal opportunity, non-discrimination and treatment in employment, which is contained in the Guidelines for Sustainable Plantation Management No. 724/TQEM-SPMS/09.  The policy was explained that in order to realize harmonious industrial relations, dynamic and fair company implemented industrial relations of each operational unit without distinction of race, religion, race and gender in all types of field work.  This policy is in place and has been disseminated to relevant stakeholders on 17 July 2022. The stakeholders including Labor Union, Gender Committee, Village Heads, Sub-District Police Officer, etc. This policy can be accessed upon requested.	Complied
6.1.2	(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against. Evidence includes migrant workers non-payment of recruitment fees.	During the audit, Unit of certification has shown evidence that non-discrimination and equal opportunity policy is implemented. Based on employee list of Feb 2023, can be concluded that the unit of certification does not practice any form of discrimination, employees are given the opportunity to work regardless of ethnicity, religion, origin, and gender. The workers came from various religion, ethnic, and area.  Based on interview with Labor Union, Gender Committee, Village Heads, Plantation Agency and Manpower Agency, they mentioned that there is no indication of discrimination conducted by Unit of certification. The job vacancies were published, the recruitments were based on competencies and suitability with the role needed. Local communities and women are not discriminated (there is no migrant worker).	Complied
6.1.3	The unit of certification demonstrates that the recruitment selection, hiring access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.	Unit of certification has prepared a procedure for hiring workers, regulated that hiring and promotion of workers based on skill, work experiences, and job evaluation in SOP of Employee Recruitment No. 394/ITH-SOP-26/11 dated 5 January 2022.	Complied



The procedure has explained:

- Prepared the standard of competence that inferred in the Position Description and Job Profile. Recruitment selection, hiring and promotion has based on skills, capabilities, qualities, and medical fitness.
- Job opportunities were communicated and given to surrounding villagers at priority where no discrimination found observed during interview and related records of workers being employed. All workers are treated equally in accordance with company regulation including rights of worker as well.

It has been verified that the recruitment process is based on skills, capabilities, qualities, and medical fitness necessary for the jobs available. For instance, the recruitment process documentation of 2022 for PKWT workers as below:

#### **Sekunyir Estate:**

- Mrs. Novita Sari: application letter by handwriting (dated 10 August 2022); medical examination registration no: 11/SKE-SHPKK/IX/2022, dated 26 Aug 2022; contract No. 071/SKE/PKWT-HRBP/IX/2022) signed and approved by Estate on 2 September 2022. Job assignment as Manuring applicator.
- Mr. Sigit Ifandri: application letter by handwriting (dated 8 August 2022); medical examination registration no: 05/SKE-SHPKK/IX/2022, dated 26 Aug 2022; contract No. 065/SKE/PKWT-HRBP/IX/2022) signed and approved by Estate on 2 September 2022. Job assignment as Manuring applicator.

#### **Seruyan Estate:**

- Mrs. Waryanti: application letter by handwriting; medical examination registration no: 10/SKE-SHPKK/I/2023, dated 22 Dec 2022; contract No. 010/SRE/SPK-PKWT/I/2023) signed and approved by Estate on 11 January 2023. Job assignment as Loose fruit collector.
- Mr. Riyanto: application letter by handwriting (dated 9 Aug 2022); medical examination registration no: 43/SRE-SHPKK/XI/2022, dated 10 Nov 2022; contract No. 148/SRE/SPK-PKWT/XI/2022) signed and approved by Estate on 16 November 2022. Job assignment as Loose fruit collector.

		Sekunyir Factory:	
		- Mr. Mida Eko Prabowo: application letter by handwriting (dated 11 March 2022); pre-test dated 10 December 2022; medical examination registration no: 26/SKF-SHPKK/01/2023, dated 4 Jan 2023; contract No. 071/SKE/PKWT-HRBP/IX/2022) signed and approved by Estate on 14 January 2023. Job assignment as Mill compound/housekeeping.	
		- Mr. M. Abdul Gafur: application letter by handwriting (dated 8 December 2022); pre-test dated 10 December 2022; medical examination registration no: 16/SKF-SHPKK/01/2023, dated 4 Jan 2023; contract No. 071/SKE/PKWT-HRBP/IX/2022) signed and approved by Estate on 14 January 2023. Job assignment as Mill compound/housekeeping.	
6.1.4	Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.	In Indonesia rules, there is no specific regulation to oblige pregnancy testing for female workers. The common activities are the female workers shall monitor their menstrual cycles individually and report to health practitioners (doctor, nurses) if menstrual cycles have changes.	Complied
		Alternative work is for work that is not related to handling chemicals, for example manual weeding or compound/housekeeping.	
		Unit of certification established the recruitment procedures 394/ITH-SOP-26/11, Rev.01, dated 23 January 2023) that during recruitment process there is no discrimination to pregnant women.	
6.1.5	<b>(C)</b> A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.	Based on interview with representative of Gender Committee during ASA 2_1, year 2023, obtain information that the Gender Committee structure and the purpose of Gender Committee has been disseminate regularly. This thing aligned with the result of interview with the women workers in estate that able to describe the women workers right such as reproduction rights, zero harassment and opportunities and equality in carrier.	Complied
		Based on interview obtained information the gender committee provide information related to the sexual harassment on women especially women worker in working areas and how to report if any harassment or violence to the	



		authority. Other than that, the gender committee is a vehicle to disseminate women rights such as reproduction right, avoid the sexual harassment/bullying and helps them to improve their sanitation in respective housing complex and many more positive activities for women.  The last meeting with gender committee was provided on 16 December 2022 attended by the gender committee board from each unit and workers representatives (Sekunyir and Seruyan Estate).	
6.1.6	There is evidence of equal pay for the same work scope.	Sample of workers' pay slip was sighted with same work scope as below:  Sekunyir Estate:  - Mrs. Novita Sari: Job assignment as Manuring applicator. Payslip February 2023: IDR 3,594,096, premium: IDR 1,067,500; Gross wage: IDR 5,220,318; Deduction: IDR 1,398,995; Nett wage: IDR 3,821,223.	Complied
		- Mr. Sigit Ifandri: Job assignment as Manuring applicator. Payslip February 2023: IDR 3,594,096, premium: IDR 1,073,400; Gross wage: IDR 5,226,218; Deduction: IDR 708,995; Nett wage: IDR 4,517,223.	
		Seruyan Estate:	
		- Mrs. Waryanti: Job assignment as Loose fruit collector. Payslip February 2023: IDR 3,306,568, harvesting premium: IDR 499,109; attendance premium: IDR 101,589; Gross wage: IDR 4,452,905; Deduction: IDR 695,192; Nett wage: IDR 3,757,713.	
		- Mr. Riyanto: Job assignment as Loose fruit collector. Payslip February 2023: IDR 1,925,409 (13 working days), harvesting premium: IDR 794,663; Gross wage: IDR 3,195,342; Deduction: IDR 624,823; Nett wage: IDR 2,570,519.	
		Sekunyir Factory:	
		- Mr. Mida Eko Prabowo: Job assignment as Mill compound/housekeeping. Payslip February 2023: IDR 3,594,096, Gross wage: IDR 4,165,967; Deduction: IDR 722,144; Nett wage: IDR 3,443,823.	

		<ul> <li>Mr. M. Abdul Gafur: Job assignment as Mill compound/housekeeping. Payslip February 2023: IDR 3,594,096, Gross wage: IDR 4,165,967; Deduction: IDR 722,144; Nett wage: IDR 3,443,823.</li> <li>Based on document verification on payslip period of February 2023 above, the minimum wage of men and women worker area equal according to the minimum wage stipulated by the local government. Through the interview with random workers during field visit and labour representatives during public consultation obtained information that there is no salary discrimination against men and women workers).</li> </ul>			
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 suffic decent living wages (DLW).					
6.2.1	<b>(C)</b> 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.	working hours, deductions, overtime, sick leave, holiday entitlement, maternity	Complied		
6.2.2	(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed.	Related documents detailing payments and conditions of employment (regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc) stipulated in each contractual agreement and Company Regulation ( <i>Peraturan Perusahaan</i> ) of 2021 – 2023. Unit of certification Regulation of 2021 – 2023 has been approved by Manpower Agency, which means that the clauses have been in accordance with	Complied		



governmental regulation. The approval was based on Decree of Manpower Agency No. KEP.143/565/HI.03/IX/Nakertrans dated 23 September 2021.

Moreover, based on review of Contractual Agreement also has been stated the clauses related regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.

Sample of contract sighted:

#### **Sekunyir Estate:**

- Mrs. Novita Sari: contract No. 071/SKE/PKWT-HRBP/IX/2022) signed and approved by Estate on 2 September 2022. Job assignment as Manuring applicator.
- Mr. Sigit Ifandri: contract No. 065/SKE/PKWT-HRBP/IX/2022) signed and approved by Estate on 2 September 2022. Job assignment as Manuring applicator.

#### **Seruyan Estate:**

- Mrs. Waryanti: contract No. 010/SRE/SPK-PKWT/I/2023) signed and approved by Estate on 11 January 2023. Job assignment as Loose fruit collector.
- Mr. Riyanto: contract No. 148/SRE/SPK-PKWT/XI/2022) signed and approved by Estate on 16 November 2022. Job assignment as Loose fruit collector.

#### **Sekunyir Factory:**

- Mr. Mida Eko Prabowo: contract No. 071/SKE/PKWT-HRBP/IX/2022) signed and approved by Estate on 14 January 2023. Job assignment as Mill compound/housekeeping.
- Mr. M. Abdul Gafur: contract No. 071/SKE/PKWT-HRBP/IX/2022) signed and approved by Estate on 14 January 2023. Job assignment as Mill compound/housekeeping.



6.2.3	<b>(C)</b> 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.	PT Indotruba Tengah has demonstrated 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.	Complied
		<ul> <li>Working hours has been determined in Peraturan Perusahaan 2021-2023 (Company Regulation - the approval was based on Decree of Manpower Agency No. KEP.143/565/HI.03/IX/Nakertrans dated 23 September 2021) as 7 hour/day with working day 6 days or 40 hour/weeks. Overtime has determined according to KepMenakertrans RI No. KEP-102/MEN/VI/2004 with formula (monthly wages + rice intensive incentive monthly)/173. Overtime will adjust for workday, holiday, number of hour overtime according to regulation.</li> </ul>	
		<ul> <li>Sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice has referred to UU No. 13 Tahun 2003.</li> </ul>	
		Based on review of Contractual Agreement also has been stated the clauses related regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.	
		Sample of contract sighted:	
		Sekunyir Estate:	
		<ul> <li>Mrs. Novita Sari: contract No. 071/SKE/PKWT-HRBP/IX/2022) signed and approved by Estate on 2 September 2022. Job assignment as Manuring applicator.</li> </ul>	
		<ul> <li>Mr. Sigit Ifandri: contract No. 065/SKE/PKWT-HRBP/IX/2022) signed and approved by Estate on 2 September 2022. Job assignment as Manuring applicator.</li> </ul>	
		Seruyan Estate:	

		<ul> <li>Mrs. Waryanti: contract No. 010/SRE/SPK-PKWT/I/2023) signed and approved by Estate on 11 January 2023. Job assignment as Loose fruit collector.</li> </ul>	
		- Mr. Riyanto: contract No. 148/SRE/SPK-PKWT/XI/2022) signed and approved by Estate on 16 November 2022. Job assignment as Loose fruit collector.	
		Sekunyir Factory:	
		- Mr. Mida Eko Prabowo: contract No. 071/SKE/PKWT-HRBP/IX/2022) signed and approved by Estate on 14 January 2023. Job assignment as Mill compound/housekeeping.	
		- Mr. M. Abdul Gafur: contract No. 071/SKE/PKWT-HRBP/IX/2022) signed and approved by Estate on 14 January 2023. Job assignment as Mill compound/housekeeping.	
6.2.4	<b>(C)</b> The unit of certification provides adequate housing. Sanitation facilities, water supplies, medical, educational and	Unit of certification has provided facilities to improve worker's wellbeing based on document review, interview, and field observation, among others:	Complied
	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.	- Adequate housing: non-permanent, semi-permanent, and permanent. The non-permanent housing has been planned in CAPEX (Capital Expenditure) planning to be renovated to permanent housing gradually. Based on field observation in housing are, Unit of certification is building some permanent houses.	
		- Sanitation facilities, domestic waste disposal, and drainage.	
		- Water supplies: from water treatment and wells.	
		- Medical facilities: Clinics in each Estate and paramedic (nurses and midwifes)	
		- Educational facilities: schools and school busses.	
		- Staple food store: provided by worker cooperative.	
		- Electricity: from Mill and gensets	
		- Mosque and Church.	

		- Sport facilities: Field of golf, tennis, badminton, football.	
		Based on verification on list workers facilities updated in February 2023 as per, there facilities were shown as bellow:	
		Employee hall: 2 units	
		Masjid/Mosque: 2 units	
		TPA/Childcare: 2 unit  TPA/Childcare: 2 unit	
		Poliklinik/Clinic: 1 unit	
		Football field: 2 units	
		Badminton court: 1	
		Water reservoir: 3 units	
		Tennis court: 1 unit	
		Employee house: 560 units	
		PT Indotruba Tengah provides adequate housing (total 560 units). A house is only filled by one family, the drainage system is clean, domestic water is clean and sufficient.	
6.2.5	The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.	PT Indotruba Tengah has a policy that workers will be given 15 kg rice (if worker is not married) and if worker have a family, then will be give 15 kg + 9kg rice, and additional 7.5 kg rice for each child with maximum 3 child. Besides that, extra food given for the workers such as milk and green bean porridge.	Complied
		The evidence has been reviewed such as payroll in February 2023 (payroll contains of salaries, premium and other benefits) and based on interviews with the workers.	
		Based on interview with labour union, PT Indotruba Tengah makes efforts to improve workers' access to adequate, sufficient, and affordable food, such as:	
		• Established Worker Cooperative ( <i>Koperasi Karyawan</i> ) and provided store to allow the cooperative to sell staple foods with affordable price.	



		•	Ne mi	earest i	od seller to enter the housing comp market selling staple food, vegeta from Sub-District city of Pangkalan le e and sufficient.	ables, me				
6.2.6	A DLW is paid to all workers in accordance with applicable regulations, including workers who work on a piece rate/quota basis, the calculation of which is based on a quota that can be achieved during regular working hours.	Cal Liv Pr wh th PT pe	Ilcul ving reva ho v at c T Inderiod	ation m Wage' Work or work or an be r dotruba d with o	rea Tengah have calculated the Enethod as set out in the "RSPO Guid", June 1, 2019. The calculated the lages) given to all workers according a piece / quota basis whose wage reached during regular working how a Tengah POM has also conducted a data drawn from Estates and POM.	ance for I decent liv to regula calculations.	mple ing v tions on is	ementing vage ( <i>Pe</i> includin based o	a Decent erhitungan g workers on a quota	Complied
		l I	No No	Benfit	Penjelasan	Total Cost	No. Of Unit	Unit Cost Per	Per Worker	
			2 3		Cost Per Housing - Benefit in 30 years Housing Maintenance Electricity Supply Water Supply Water Supply Community Building Maintenance (Masjid, TPA, dll) Transport (Ambulance) Dokter Visit (include Posyandu Cost) Other Health Cost (extra fooding posyandu, etc) Sports & Other Transport Sports Sequipment & fascilities School Transport (Bus Sekolah) Bantuan Perayaan Harl Besar (17 Agustus, Tahun Baru, Keagamaan, dll) Guru Penitigian Anak Workers Transport total in-kind benefit Average Monthly THP salary worker Total Value of Prevailing Wage  ed the Decent Living Needs using tl		216 216 216 369 369 369 369 369 369 369 369 369 36			
		in	the Th	: "RSPO ne minir	OGuidance for Implementing a Dec mum wage as refer to updated Reg overnor Decree No. 188.44/472/202	ent Living ional Mini	Wag mun	ge, 1 Jur n Wage y	ne 2019", /ear 2023	



<ul> <li>Living Wage Gap at Rp. 594,086 (positive).</li> <li>Based on the calculation the minimum wage plus allowance and other in-kind benefit received by a worker amount IDR 5,567,644/month.</li> </ul>		Based on the calculation the minimum wage plus allowance and other in-
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#### PROCEDURAL NOTE:

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

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

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

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

6.2.7	Permanent fulltime employment is used for all core work performed by the unit of certification. Casual, temporary and	PT Indotruba Tengah did not have a casual worker scheme. PT Indotruba Tengah has a policy to only hired permanent workers for all core	Complied
		work such as harvesting, spraying and mill processing. Temporary worker (PKWT) applied only for the new worker under probation and temporary or seasonal, several jobs.	
		According to the interview with the random worker obtain information that there is a working agreement (PKWT) with respective workers related to the job type, wage, working hour, insurance, and end of contract. They have been paid in accordance with the agreement and no negative issues until this audit.	
		Sample of contract sighted:	
		Sekunyir Estate:	



		<ul> <li>Mrs. Novita Sari: contract No. 071/SKE/PKWT-HRBP/IX/2022) signed and approved by Estate on 2 September 2022. Job assignment as Manuring applicator.</li> <li>Mr. Sigit Ifandri: contract No. 065/SKE/PKWT-HRBP/IX/2022) signed and</li> </ul>	
		approved by Estate on 2 September 2022. Job assignment as Manuring applicator.	
		Seruyan Estate:	
		- Mrs. Waryanti: contract No. 010/SRE/SPK-PKWT/I/2023) signed and approved by Estate on 11 January 2023. Job assignment as Loose fruit collector.	
		- Mr. Riyanto: contract No. 148/SRE/SPK-PKWT/XI/2022) signed and approved by Estate on 16 November 2022. Job assignment as Loose fruit collector.	ļ
		Sekunyir Factory:	
		- Mr. Mida Eko Prabowo: contract No. 071/SKE/PKWT-HRBP/IX/2022) signed and approved by Estate on 14 January 2023. Job assignment as Mill compound/housekeeping.	
		- Mr. M. Abdul Gafur: contract No. 071/SKE/PKWT-HRBP/IX/2022) signed and approved by Estate on 14 January 2023. Job assignment as Mill compound/housekeeping.	
	ation and collective bargaining are restricted under law, the er	to form and join trade unions of their choice and to bargain collectively. Where the right to free apployer facilitates parallel means of independent and free association and bargaining for all s	
6.3.1	<b>(C)</b> 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.	Guidelines for Sustainable Plantation Management No. 724/TQEM-SPMS/09.	d

		unit to recognizing freedom of association and right to collective bargaining. This policy is publicly available, and stakeholder can access it upon request. Structure of Labor Union ( <i>Serikat Pekerja Seluruh Indonesia/SPSI</i> ) presented in document of Decree No. 099/PC-FSPP-SPSI/KTB/X/2018 dated 26 <sup>th</sup> October 2018.	
6.3.2	Minutes of meetings between the unit of certification with trade unions or worker representatives who are freely elected, are documented in the national languages and available upon request.	SPSI PT Indotruba Tengah are documented in "Notulen Pembahasan Sistem	Complied
6.3.3	Management does not interfere with the formation or operation of registered labour organizations/unions, or other freely elected representatives for all workers, including migrant and contract workers.	Labor Union ( <i>Serikat Pekerja Seluruh Indonesia/SPSI</i> ) is formed and approved by branch board as per document of Decree No. 099/PC-FSPP-SPSI/KTB/X/2018 dated 26 <sup>th</sup> October 2018.  Based on interview with Chairman of Labor Union, union formed is freely and no	Complied
		interfere by unit of certification. There is no coercion and intervention related to membership and the course of the Unit of certification.	
Criteria	<b>6.4:</b> Children are not employed or exploited.		
6.4.1	A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.	Unit of certification has established and documented policy or the protection of children, including prohibition of child labour as per "Social Policy", signed by Head Plantation since December 2011. Stated in point 6 that Plantation upstream Indonesia prohibits to use forced labour or child labour.  In the SOP of Employee Recruitment (No. 394/ITH-SOP-26/11 dated 5 January 2022) also mentioned that Unit of certification will not recruit the candidate under 18 years old.	Complied
6.4.2	<b>(C)</b> Documented evidence on the fulfilment of worker's minimum age requirements in accordance with applicable regulation and verification procedures for age requirements, are available.	The policy has been included into service contracts; sample seen on Contractual Agreement with CV Putra Isen Mulang No. SKE/SPK-LKL/I/2022/006 dated 2 January 2022 for FFB Transport. In the contract stated that the contractor must	Complied

		be obey and comply to regulation and company policy including no forced labor and child labour.	
		Based on workers list verification in Seruyan Estate updated Feb 2023 can be demonstrated that there are no workers is under 18 years old at the time they were recruited. It is also has been verified during field observation and interview with stakeholders, that Unit of certification did not recruit child labor.	
		Seruyan Estate:	
		The youngest temporary worker "PKWT" is born Dec 1999 (join date in Sep 2022) or 23-year-old.	
		Sekunyir Estate:	
		The youngest temporary worker "PKWT" is born Aug 1998 (join date in Sep 2022) or 24-year-old.	
6.4.3	<b>(C)</b> Young person maybe employed only for non-hazardous work with protective restrictions in place for that work.	Based on descriptions on indicator 6.4.1 and 6.4.2, it is clear that the company did not employ candidate under 18 years old.	Complied
6.4.4	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	No child labor policy has been disseminated to relevant stakeholder on 17 July 2022. The stakeholders including Labor Union, Gender Committee, Village Heads, Sub-District Police Officer, etc.	Complied
	other key staff, smallholders, FFB suppliers and communities where workers live.	Moreover, the policy has been included into service contracts, sample seen on Contractual Agreement with CV Putra Isen Mulang No. SKE/SPK-LKL/I/2022/006 dated 2 January 2022 for FFB Transport. In the contract stated that the contractor must be obey and comply to regulation and company policy including no forced labor and child labour.	
		Based on interview with workers, Labour Union, Gender Committee, Village Heads, including FFB Contractor, can be concluded that Unit of certification has disseminated, and stakeholders has understood the no-child labor policy.	

6.5.1	<b>(C)</b> A policy to prevent sexual and all other form of harassment and violence is documented, implemented and communicated to all levels of the workforce.	PT Indotruba Tengah has established a policy under Minamas Corporate Group as per "Gender Policy" dated 11 April 2011. In the policy point 1 stated that company commit to prevent the sexual harassment "Endeavour top prevent sexual harassment and all other forms of violence against women, workers and community".	Complied
		Based on the verification document shows that the management has disseminated this policy as follows:	
		• Posted a policy under Minamas Corporate Group as per "Gender Policy" in the information board in each unit mill/estate.	
		Policy dissemination for the internal workers during morning briefing. As informed by the workers it conducted almost every morning briefing.	
		<ul> <li>Dissemination to external parties such as on 9 November 2022. The stakeholders including Labor Union, Gender Committee, Village Heads, Sub- District Police Officer, etc.</li> </ul>	
		PT Indotruba Tengah has the training program including the refreshment training related Minamas Corporate's Policies annually. Next training planned at the end of 2023 (October-November)	
		PT Indotruba Tengah has formed a Gender Committee as a place to submit grievance related sexual or other form of harassment, or violation of reproductive rights. Based on interview with Head of Gender Committee and women workers, it is known that there is no negative issue related to sexual harassment or violation of reproductive rights.	
		Based on interview with sample of female workers and Gender Committee representative during this audit, it is clearly that they have understood the company's policies on prevention of sexual harassment.	
6.5.2	<b>(C)</b> A policy to protect the reproductive rights of all, especially of women, is documented, implemented and communicated to all levels of the workforce.	PT Indotruba Tengah has established a policy under Minamas Corporate Group as per "Gender Policy" dated 11 April 2011. In the policy point 1 stated that company commit to prevent the sexual harassment "Endeavour top prevent	Complied

		sexual harassment and all other forms of violence against women, workers and community".	
		disseminated this policy as follows:	
		Posted a policy under Minamas Corporate Group as per "Gender Policy" in the information board in each unit mill/estate.	
		Policy dissemination for the internal workers during morning briefing. As informed by the workers it conducted almost every morning briefing.	
		Dissemination to external parties such as on 9 November 2022. The stakeholders including Labour Union, Gender Committee, Village Heads, Sub-District Police Officer, etc.	
		Based on interview with workers, Labour Union, and Gender Committee, it is known that they have understood the company's policy to protect worker's reproductive rights.	
		Since 2022-2023, there is no negative issue related to sexual harassment or violation of reproductive rights.	
6.5.3	Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified in accordance with applicable regulations in Indonesia.	Unit of certification has conducted assessment of new mothers annually and performed by company doctor. The assessment is provided within Identification Form and documented in "Identifikasi Kebutuhan Ibu Muda/Ibu Baru Program Kesehatan Ibu Hamil dan Melahirkan".	Complied
		Document of identification in year 2022 is sighted within "Identifikasi Kebutuhan Ibu Muda/Ibu Baru Program Kesehatan Ibu Hamil dan Melahirkan Tahun 2022", dated 2 March 2023.	
		The assessment consists of Identification of Needs, Statistic Data, Analyses Sources and Propose Actions. Based on statistic data, resulted that in period Jan-Dec 2022 there are 17 deliveries birth and period Jan-Feb 2023 there is one delivery birth. All deliveries were workers' wives, and none of the female workers gave birth from all these deliveries.	
6.5.4	A grievance mechanism, which respects anonymity and protects complainants where requested, as long as the	No changes of grievance mechanism.	Complied



	complaint is supported with adequate information, is documented, implemented and communicated to all levels of the workforce.	The unit of certification has procedure to address any dispute or grievance in SOP of Grievance Resolution of Stakeholder (No. 01/MPK-OU/XII/21 dated 01 December 2021). The SOP has included timing to respond the grievance (max 14 days), to ensure the anonymity of any party if requested, and grievance resolution without any reprisal or intimidation. If the cases cannot be handled at Estate/Mill level, the cases will be escalated to the next level of management, using mediator, or to be escalated to the court or RSPO website (complaint panel).  Moreover, Unit of certification has formed a Gender Committee as a place to submit grievance related sexual harassment or violation of reproductive rights. Based on interview with Head of Gender Committee and women workers, are known that there is no negative issue related to sexual harassment or violation of reproductive rights.  Based on interview with workers and Gender Committee, since 2022-2023, there is no negative issue related to sexual harassment or violation of reproductive rights.	
Criteria 6	<b>6.6:</b> No forms of forced or trafficked labour are used.		
6.6.1	<ul> <li>(C) All work is voluntary and the following are prohibited:</li> <li>Retention of identity documents or passports;</li> <li>Payment of recruitment fees;</li> <li>Contract substitution without worker's consent</li> <li>Involuntary overtime;</li> <li>Lack of freedom of workers to resign</li> <li>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</li> <li>Debt bondage</li> <li>Withholding of wages</li> </ul>	Unit of certification has established and documented policy about force or trafficked labour in Social Policy point 1 stated that "Unit of certification prohibit forced labour or child labour". Company forbids child labour, forced labour, and will provide work contract in language that understood by workers and make sure the payment give to workers in simple ways, on time and clear.  Auditors conduct interviews with a sample of newly recruited PKWT employees to ensure this indicator is compliant. The workers clearly explained that during the recruitment process, Unit of certification is voluntarily recruiting, no retention of any personal or legal documents from the applicants, and the salary is paid in a timely manner without any debt bondage or unreasonable deduction. The recruitment process was free, and no fees were imposed on the applicants.	Complied



6.6.2	<b>(C)</b> 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.	Step of Specified Time Work Agreement recruitment at unit of certification refers to corporate procedure for hiring worker, regulated that hiring and promotion of workers based on skill, work experiences, and job evaluation as per document "Standard Operating Procedure – Penerimaan Karyawan No. 394/ITH-SOP-26/11" - dated 23 January 2023)	Complied
		The procedure has explained:	
		- Prepared meet the standard of competence that inferred in the Position Description and Job Profile.	
		<ul> <li>Job opportunities were communicated and given to surrounding villagers as a priority where no discrimination was observed during interviews and related records of workers being employed.</li> </ul>	
		- All workers have been treated equally in accordance with company regulations including the rights of worker as well.	
		Sample taken for recruitment process:	
		Sekunyir Estate:	
		- Mrs. Novita Sari: application letter by handwriting (dated 10 August 2022); medical examination registration no: 11/SKE-SHPKK/IX/2022, dated 26 Aug 2022; contract No. 071/SKE/PKWT-HRBP/IX/2022) signed and approved by Estate on 2 September 2022. Job assignment as Manuring applicator. Payslip February 2023: IDR 3,594,096, premium: IDR 1,067,500; Gross wage: IDR 5,220,318; Deduction: IDR 1,398,995; Nett wage: IDR 3,821,223.	
		- Mr. Sigit Ifandri: application letter by handwriting (dated 8 August 2022); medical examination registration no: 05/SKE-SHPKK/IX/2022, dated 26 Aug 2022; contract No. 065/SKE/PKWT-HRBP/IX/2022) signed and approved by Estate on 2 September 2022. Job assignment as Manuring applicator. Payslip February 2023: IDR 3,594,096, premium: IDR 1,073,400; Gross wage: IDR 5,226,218; Deduction: IDR 708,995; Nett wage: IDR 4,517,223.	
		Seruyan Estate:	



- Mrs. Waryanti: application letter by handwriting; medical examination registration no: 10/SKE-SHPKK/I/2023, dated 22 Dec 2022; contract No. 010/SRE/SPK-PKWT/I/2023) signed and approved by Estate on 11 January 2023. Job assignment as Loose fruit collector. Payslip February 2023: IDR 3,306,568, harvesting premium: IDR 499,109; attendance premium: IDR 101,589; Gross wage: IDR 4,452,905; Deduction: IDR 695,192; Nett wage: IDR 3,757,713.
- Mr. Riyanto: application letter by handwriting (dated 9 Aug 2022); medical examination registration no: 43/SRE-SHPKK/XI/2022, dated 10 Nov 2022; contract No. 148/SRE/SPK-PKWT/XI/2022) signed and approved by Estate on 16 November 2022. Job assignment as Loose fruit collector. Payslip February 2023: IDR 1,925,409 (13 working days), harvesting premium: IDR 794,663; Gross wage: IDR 3,195,342; Deduction: IDR 624,823; Nett wage: IDR 2,570,519.

#### **Sekunyir Factory:**

- Mr. Mida Eko Prabowo: application letter by handwriting (dated 11 March 2022); pre-test dated 10 December 2022; medical examination registration no: 26/SKF-SHPKK/01/2023, dated 4 Jan 2023; contract No. 071/SKE/PKWT-HRBP/IX/2022) signed and approved by Estate on 14 January 2023. Job assignment as Mill compound/housekeeping. Payslip February 2023: IDR 3,594,096, Gross wage: IDR 4,165,967; Deduction: IDR 722,144; Nett wage: IDR 3,443,823.
- Mr. M. Abdul Gafur: application letter by handwriting (dated 8 December 2022); pre-test dated 10 December 2022; medical examination registration no: 16/SKF-SHPKK/01/2023, dated 4 Jan 2023; contract No. 071/SKE/PKWT-HRBP/IX/2022) signed and approved by Estate on 14 January 2023. Job assignment as Mill compound/housekeeping. Payslip February 2023: IDR 3,594,096, Gross wage: IDR 4,165,967; Deduction: IDR 722,144; Nett wage: IDR 3,443,823.

		Sample record of Temporary work agreement "Perjanjian Kerja Waktu Tertentu / PKWT:  - Temporary work agreement "Perjanjian Kerja Waktu Tertentu No.062/SKE/PKWT-HRBP/IX/2022 Sekunyir Estate dan Robi Hermaen" for fertilizer work dated 26 August 2022. Time frame 1 September 2022 – 31 August 2023. Worker entitles for wage Rp.3,317,668 + rice 15 kg/month. Religious day benefit paid before religious day. Worker registered with BPJS Ketenagakerjaan and BPJS Kesehatan. Worker entitles to 12 days annual leave.  - Temporary work agreement "Perjanjian Kerja Waktu Tertentu No.067/SKE/PKWT-HRBP/IX/2022 Sekunyir Estate dan Poniti" for fertilizer work dated 26 August 2022. Time frame 1 September 2022 – 31 August 2023. Worker entitles for wage Rp.3,317,668 + rice 15 kg/month. Religious day benefit paid before religious day. Worker registered with BPJS Ketenagakerjaan and BPJS Kesehatan. Worker entitles to 12 days annual leave.  - Temporary work agreement "Perjanjian Kerja Waktu Tertentu No.066/SKE/PKWT-HRBP/IX/2022 Sekunyir Estate dan Kasmurah" for fertilizer work dated 26 August 2022. Time frame 1 September 2022 – 31 August 2023. Worker entitles for wage Rp.3,317,668 + rice 15 kg/month. Religious day benefit paid before religious day. Worker registered with BPJS Ketenagakerjaan and BPJS Kesehatan. Worker entitles to 12 days annual leave.	
Criteria (	6.7: The unit of certification ensures that the working environm	nent under its control is safe and without undue risk to health.	
6.7.1	<b>(C)</b> The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.	PT Indotruba Tengah – Sekunyir POM has had a P2K3 Structure (OHS Committee) which was formed based on national regulation.  P2K3 Structure has been approved by Manpower Agency based on Decree No. 146/DISNAKETRANS/II/2023 dated 23 February 2023. The attachment is P2K3 structure and firefighting team structure.	Complied

		According to national regulation, the P2K3 Secretary must be a licensed OHS Expert. The OHS Expert is Mr. Asmara Hadi with details below:	
		- OHS Expert Certificate No. 13.2257/AK3/U/VII/2013 dated 4 July 2013.	
		- OHS Expert License Reg. No. 6196/PK3/AJ/31/2020/P2 valid thru 20 January 2023 (letter application the license extension: 288/AMU/K3/II/2023 – dated 21 <sup>st</sup> February 2023)	
		Regular meetings involving management and workers have been conducted to implement, discuss, and evaluate the OHS program and incident.	
		Sample seen on the last OHS meeting dated 31st January 2023, sighted agenda:	
		- Discuss on updating the OHS committee structure and emergency response team	
		- Discuss on "Bulan K3" February 2023	
		- Monitoring on OHS inspection.	
		- Review on accidents report.	
		PT Indotruba Tengah – Sekunyir POM has regularly performed the Report of OHS in 3 months bases reported to Dinas Tenaga Kerja dan Transmigrasi Kabuapten Kotawaringin Barat as per document: Laporan P2K3 PT Indutruba Tengah – PKS Sekunyir periode October – December 2022. The document has been receipted by Dinas Tenaga Kerja dan Transmigrasi on 1st February 2023 - completed with stamping.	
6.7.2	Accident and emergency procedures in Indonesian language are in place and clearly understood by all workers. Assigned		Complied
	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.		



The procedure described the description of emergency may happen in plantation and mill, roles and responsibilities of each emergency response team include the mechanism how to conduct medical evacuation to near hospital/local health center, also it was available the emergency contact number of each internal emergency team and external related parties. Evacuation route and muster point are available and made known to the employee.

The structure of Emergency Response Team (ERT) has been established and been approved by Manpower Agency based on Decree No. 146/DISNAKETRANS/II/2023 dated 23 February 2023. The attachment is P2K3 structure and firefighting team structure.

Consisted of: ERT commander, Fire Fighting Commander, Community Team, Fire Fighting Team, Transportation Team, Communication Team, and Evacuation Team. The list of protection equipment for emergencies was available such as fire extinguisher, fire engine.

The awareness of employee was gained with the simulation of emergency response and Fire training conducted annually both for Mill and Estate. Last training conducted on  $11^{\text{th}}$  February 2023, location in Sekunyir POM. Data seen: scenario, attendance list, documentation, and evaluation.

Evacuation routes and emergency flowcharts have been disseminated during simulation. Emergency signs and boards were provided in several areas. Muster points for each area such as workshop, warehouse and office were sighted.

PT Indotruba Tengah – Sekunyir POM has assigned the first aider on behalf Angga Prasetya. He has certified as first aider based on Certificate No: Ser.1485-P3K/9/2022 dated 12<sup>th</sup> September 2022. (Valid until 5 years).

Updating year 2022, the first aid equipment's are available in the worksites. There are 23 first aid kit available in Sekunyir Estate, 6 first aid kit at Sekunyir Factory/Mill and 11 First aid kit in Seruyan Estate.

Monitoring of First aid kit conducted in monthly basis. Evidence of monitoring can be shown during ASA 2\_1-year 2023.



		Record of all accident are periodically review as per OHS Committee meeting. Record of accident report as per Accident report and LTI report. The data will be mentioned in indicator 6.7.5	
6.7.3	(C) Workers use appropriate personal protective equipment (PPE) which is provided free of charge to all workers in the workplace, to cover all potentially hazardous operations, such as pesticides application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.	through interview with sampled worker.  Seruyan Estate:  - Provision of PPE to 14 harvesters and 7 loose fruit collectors: 1 pair of shoes and 1 helmet, dated 26 January 2023. Interviewed: harvester Delyy A	Complied



		Monitoring of PPE minimum stock – connected to SAP and alerting Manager for immediate purchase "PPE One Alert System". Sighted Purchase Request "Permintaan Pembelian Non Kapital No.EST/SKE/I/2023/009" dated 15 January 2023 for rubber boots, helmet, sickle cover knife cover, axe cover, apron, filtered masker, rubber hand glove, goggle, ear plug, safety shoes, welding goggle.	
6.7.4	All workers are provided medical care and covered by accident insurance. Costs incurred from work related incidents, leading to injury or illness, are covered in	PT Indotuba Tengah – Sekunyir POM provide Clinics in each Estate including its paramedic of nurse and midwife. A company doctor also available in regional scope (covering several companies in the group).	Complied
	accordance with applicable regulations or by the unit of certification if applicable regulations do not provide protection.	For annual medical check-up has been conducted in December 2022 was conducted by PJK3 – PT Cahaya Krisnako. Sample seen: Certificate Hasil Pemeriksaan Kesehatan Kerja, No Registrasi: 33/CPK/XII/2022 dated 17 December 2022 namely Mr Sarvina (pesticides applicator), Mr Sugianto (manuring)	
		PT Indotruba Tengah – Sekunyir POM has also provided the employees with employment and health insurance ( <i>BPJS Ketenagakerjaan and BPJS</i> Kesehatan) to cover occupational accident and medical insurance in accordance with the national regulation, which is routinely paid every month for all workers including the dependant for health insurance.	
		Data seen: the employment insurance has been paid, period January 2023. Bank Voucher number: 29/BVK/SRE/II/2023 — subject: Pembayaraan Iuran BPJS Ketenagakerjaan Februari 2023.	



6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	PT Indotruba Tengah – Sekunyir POM has recorded its occupational injuries using Lost Time Accident (LTA) metrics.  LTA report of 2022 has been made by each estate and mill as below:					Complied		
		11!4	Year To	date					
		Unit	Case	LTI	WH	FR	SR		
		Sekunyir Esta	te -	-	768,3	388			
		Seruyan Estat	:e -	-	601,3	370			
		Sekunyir Mill	-	-	248,0	019			
Criteria	<ul> <li>7.1: Pests, diseases, weeds and invasive introduced species are</li> </ul>	e effectively mar	naged using ap	propriate	e Integra	ated Pest Ma	nagement	` ,	•
Criteria 7.1.1	(C) IPM plans are implemented and monitored to ensure	PT. Indotruba	Гengah prepar	ed Integr	ated Pe	st Managem	ent Plan "Pr	ogram dan	iques. Complied
	effective pest control.	Penanganan H 2023".	ama dan Peny	akit Tan	aman s	erta Pengen	dallan Ham	a rerpadu	
		Type of Pest & Disease	<u>Act</u>	<u>ivity</u>		Time frame	Rem	arks	
		Bagworm and nettle caterpillar	Monitoring/cobagworm cateroillar inf	and n		Every month	-		
		infestation	Nettle caterp	illar conti	rol		Chemical		
			Manual contr	<u>ol</u>			implemer when	nted pest	
			Handpicking				infestatio	n .	
			Handpicking	the coco	on		surpasse	d	

		Chaminal and a		economic
		<u>Chemical control</u>		threshold.
		Fogging with insecticide		
		Spraying insecticide with knapsack		
		Biological control		Planting of
	b 	Planting and maintenance beneficial plant 20% Antigonon leptopus, 20% Turnera subulata, 60% Cassia tora	January – March; October - December	beneficial plant depends on rainfall condition.
	squirrel	Monitoring barn owl box and the population	Every month	-
	infestation	Monitoring the area and level of rat and squirrel infestation	Every month	-
Rh	Oryctes/ Rhino beetle infestation	Monitoring <i>Oryctes</i> infestation and monitor the area (mapping)	Every month	-
		Installation of Pherotrap		Control
	Ganoderma sp infestation	Chemical control		implemented when infestation beyond economic threshold.
sp		Monitoring <i>Ganoderma sp</i> infestation and monitor the area (mapping)	Every month	-

		Making isolation ditch and thinning out on palm infested with <i>Ganoderma</i> Control implemented when infestation beyond economic threshold.	
		Audit team verified the pest census:	
		<ul> <li>Oryctes census Sekunyir Estate "Rekapitulasi Sensus dan Pengendalian Oryctes Sekunyir Estate; census in block 21C005 (C15), 22B002 (B08, B07, B06, B05); census dated 28 January-20 February 2023; census covers area of 626.98 Ha; 8,455 palms monitored; 90 new palms shows attack; average 1.06% attack.</li> </ul>	
		- Rat attack census Seruyan Estate "Rekapitulasi Serangan Tikus di Areal Replanting Seruyan Estate; census in 20E008 (E16, E17, E18, E19), 20E006 (E15), 20E005 (E11, E12, E13, E14, E15), 21B005 (B14, B15), 21B004 (B12, B13), 21C005 (C12, C13, C14, C15); census dated 1-20 February 2023; census covers area of 563.52 Ha; 7717 palms monitored; 19 new palms shows attack; average 0.22% attack.	
		<ul> <li>Caterpillar census "Rekapitulasi Sensus dan Pengendalian Ulat dan Pengendalian Sekunyir Estate"; census in block 21C005, dated 17 February 2023; census covers area of 32.25 Ha; Sethora nitens 0.02 per palm frond; in block 20E0082; dated 2 February 2022; census covers area of 42.38 Ha; Sethora nitens 0.96 per palm frond;</li> </ul>	
7.1.2	Invasive species are not to be used according to applicable regulation in managed areas, unless plans to prevent and monitor their spread are implemented.	PT. Indotruba Tengah use several species as part of IPM.  In Sekunyir Estate and Seruyan Estate, <i>Tyto alba</i> (Barn owl) as predator for rat and squirrel. Company made review to CABI list – Invasive Species Compendium. The CABI data list stipulates <i>Tyto alba</i> distribution in Indonesia was origin native and not invasive, based on reference to Bruce, 1999.	
		Antigonon leptosus (Coral vine) as natural host for caterpillar predator. Company made review to CABI list – Invasive Species Compendium. The CABI data list	

		stipulates <i>Antigonon leptosus</i> distribution in Indonesia was introduced and no invasive status, based on reference to Burke and DiTommaso, 2011.  Company made review to CABI list – Invasive species Compendium. The CABI data list stipulates <i>Cassia cobanensis</i> and <i>Turnera subulate</i> as – "No matches record found".	
7.1.3	There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities.	Based on field visit and document review, there is no use of fire for pest control in whole area of Sekunyir Estate and Seruyan Estate.	Complied
Criteria	7.2: Pesticides are used in ways that do not endanger health o	f workers, families, communities or the environment.	
7.2.1	<b>(C)</b> Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.	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).	Complied
		Recommendation of pesticide used are refer to Standard Operation Procedure Referensi Manual Agronomi Penanaman Kelapa Sawit No.POLICY:110/EST-ARM/13" dated 16 September 2013. Section 15 Proteksi Tanaman Sub-section 2. Jenis Bahan Kimia untuk Pengendalian Hama Tanaman Kelapa Sawit" explains the type of pest, type of active ingredient for control, active ingredient percentage, Application: rate of active ingredient percentage, rate/palm and dilution – for mature and immature palm.	
		The SOP stated the requirement for census process, economic threshold, application tools, calibration, application dosage, use of beneficial plant – prior to use of chemical.	
		Spraying works carried out by selected spraying on specific target, for example weeds spraying on circle, path and TPH (marketplace). 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.	

Type of pesticid are as follow:	use by Sekunyir	Estate and Ser	uyan Estate and its weeds target
Agro chemical	Active ingredients	Register No.	Weeds target
Basta 150 SL	lufosinat 150	RI.0103011 9921113	Wide leaf (Ageratum conyzoides); narrow leaf (Axonophus compressus, Imperata cylindrica, Ischaemum timorense, Ottochloa nodosa, Setaria palmifolia).
Capture 50 EC	, .	RI.0101012 0031874	Pest
Centalon 480 EC		RI.0103012 0103716	General weed
Dithane 800 WP		RI.0102011 97459	Fungi
Kencepat 75 SP		RI.0101012 0103756	Pest, caterpillar
Kenlon 480 EC	utoksi Etil 480	RI.0103012 0062433	Wood
Kenlly 20 WG	,	RI.0104012 0062432	Chromolaena adorata, Ageratum conyzoides, Clidemia hirta

Ken Up 480 SL	Glyphosate	RI. 010301200 62435	Wide leaf (chromolaena adorate, Syndrella nodiflora, Mikana micrantha); narrow leaf (Ottochloa nodosa)	
Lifeline 280 SL	Amonium Glyphosate	RI.0103012 0175849	Narrow leaf and Wide leaf weed	
Metaprima 20 WG	Methyl metsulfuron	RI.0103012 0031897	Chromolaena adorata, Ageratum conyzoides, Clidemia hirta	
Prima Up 480 SL	Isopropilamina Glyphosate	RI.0103012 0031779	Narrow leaf weed	

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7.2.2	used and their LD50, area treated, amount of active ingredients applied per Ha and number of applications) are	Document "Rekapitulasi pesticides use including a ingredients applied per He Pesticide use in Sekunyir	ctive ingred a and per to	ients, LD50,			Complied
		Too door and	I I - M		Volume		1
		Trademark	UoM	2020	2021	2022	1
		Kenlon 480 EC/Dalopir	Liter	777	116	-	1
		Centalon 480 EC	Liter	-	165	-	1
		Kenlly 20 WG	Liter	125	-	-	1
		Lifeline 280 SL	Liter	-	2,065	-	1
		Ken Up 480 SL	Liter	2,678	-	-	1
		Capture 50 EC	Liter	-	5,191	1,000	1
		Becano 500 SC	Liter	10	-	1	1
		Ken Rane 288 EC	Liter	14	-	-	1
		Prima Up 480 SL	Liter	1,794	6,304	300	1
		Agristik	Liter	20	135	-	1
		Metaprima	Kg	110	201	28	1
		Ally 20 WP	Kg	585	-	-	1
		Dithane 800 WP	Liter	10	31	3	

Kencepat 75 SP

Basta

Kg

kg

	<u></u>	Pesticide use in Seruvan I	esticide use in Seruyan Estate:					
		,			Volume			
		Trademark	UoM	2020	2021	2022		
		Kenlon 480 EC/Dalopir	Liter	132	6	153		
		Centalon 480 EC	Liter	70	38	-		
		Kenlly 20 WG	Liter	61	-	-		
		Lifeline 280 SL	Liter	241	98	186		
		Ken Up 480 SL	Liter	626	-	-		
		Capture 50 EC	Liter	3,491	4,975	6,504		
		Becano 500 SC	Liter	39	-	-		
		Prima Up 480 SL	Liter	2,783	2,943	5,176		
		Metaprima	Kg	52	95	188		
		Kenrane 288 EC	Liter	-	-	402		
		Manthene 75 SP	Liter	-	-	1,429		
		Basta 150 SL	Liter	-	-	1,860		
		Supremo 480 AS	liter	-	-	204		
7.2.3	<b>(C)</b> Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.	From the document verification, field visit and interview with management, audit team obtain information that the use of pesticide are minimized as part of the plan, and in accordance with IPM Plans, there are no pesticide application outside of the targeted species and planned intervals. Pesticide are only used to reduce/eliminate existing pest, which has exceeded the economic threshold.					Complied	

7.2.4	There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in Indonesia best practice guidelines.	team obtain i throughout Sel								
7.2.5	Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat, are not to be used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government	confirmed that as World Healt or Rotterdam C	Based on the data for goods in and goods out at the pesticide store, it has been confirmed that the unit of certification does not use pesticides that are classified as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions. Additionally, it has been confirmed that the company is no longer using paraquat dichloride since 2019.							
	authorities for pest outbreaks.  The due diligence refers to: 7.2.5a Judgment of the threat and verify why this is a major threat.  7.2.5b Why there is no other alternative which can be used.	goal of minimi agricultural pro guidelines help responsible pro	This level of vigilance in choosing and using pesticides supports the company's goal of minimizing its impact on the environment and promoting sustainable agricultural practices. The unit of certification's strict adherence to these guidelines helps to ensure that the company is using only the most safe and responsible products, and that it is avoiding hazardous materials that are known							
	7.2.5c Which process was applied to verify why there is no other less hazardous alternative.	to be particular The unit of ce Health Organiz								
	7.2.5d Process to limit the negative impacts of the application.  7.2.5e Estimation of the timescale of the application and stops taken to limit application to the specific outbrook.	Rotterdam Con Based on reco WHO Class 1/ Conventions ar	use of							
	steps taken to limit application to the specific outbreak.	Type of pesticion are as follow:	cide use by Sekunyir Estate and Seruyan Estate and its weeds target							
		Agro chemical	Active ingredients	Register No.	Weeds target					

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Basta 150 SL	Amonium Glufosinat 150 g/l	RI.0103011 9921113	Wide leaf (Ageratum conyzoides); narrow leaf (Axonophus compressus, Imperata cylindrica, Ischaemum timorense, Ottochloa nodosa, Setaria palmifolia).
Capture 50 EC	Cypermethrin	RI.0101012 0031874	Pest
Centalon 480 EC	Triklopir Butoksi Etil	RI.0103012 0103716	General weed
Dithane 800 WP	Mankozeb	RI.0102011 97459	Fungi
Kencepat 75 SP	Acephate	RI.0101012 0103756	Pest, caterpillar
Kenlon 480 EC	Trikolopir Butoksi Etil 480 g/l	RI.0103012 0062433	Wood
Kenlly 20 WG	Methyl metsulfuron	RI.0104012 0062432	Chromolaena adorata, Ageratum conyzoides, Clidemia hirta
Ken Up 480 SL	Glyphosate	RI. 010301200 62435	Wide leaf <i>(chromolaena adorate, Syndrella nodiflora, Mikana micrantha);</i> narrow leaf <i>(Ottochloa nodosa)</i>
Lifeline 280 SL	Amonium Glyphosate	RI.0103012 0175849	Narrow leaf and Wide leaf weed

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		Metaprima 20 WG	Methyl metsulfuron	RI.0103012 0031897	Chromolaena Ageratum Clidemia hirta	adorata, conyzoides,	
		Prima Up 480 SL	Isopropilamina Glyphosate	RI.0103012 0031779	Narrow leaf wee	ed	
		based on amo calculated the There was no p	unt of pesticide ( LD50 of each pest pesticide used to (	used. Sekunyir ticide (herbicid control pest inf	of LD50 calculation Estate and Seruy e) in a monthly basestation and no peding (herbicide).	yan Estate has asis.	
7.2.6	(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they conduct.	In Sekunyir Est - Calibration December 2 result avera - "Pelatihan, System" dat and applicat spraying to calibration,	<ul> <li>PT. Indotruba Tengah provided training for agrochemical operators.</li> <li>In Sekunyir Estate, training provided for personnel handling pesticide;</li> <li>Calibration report "Berita Acara Kalibrasi Nozzle Chemist Piringan" dated 118 December 2022. Attended by 12 sprayers; using LV Orange Cone Nozzle; result average flow rate 275 cc and time 1.5 minutes.</li> <li>"Pelatihan, Safety Briefing &amp; Arahan Sistem Kerja Tim Block Spraying System" dated 2 March 2023 attended by Assistant, mandor, and 15 sprayers and applicators. Located at Field F005, training material covers knowledge of spraying tools and pesticides, correct schedule and dosage, spraying tools calibration, MSDS, PPE, health and safety and first aid (ERP).</li> </ul>				Complied
			and Kalibrasi Sen 18 sprayers. Th	•	December 2022 spraying calibratio	,	

		<ul> <li>"Pelatihan, Safety Briefing &amp; Arahan Sistem Kerja Tim Block Spraying System" dated 4 March 2023 attended by Assistant, mandor, and 9 sprayers. Located at Field B017, training material covers knowledge of spraying tools and pesticides, correct schedule and dosage, spray calibration, PPE, health and safety and first aid (ERP).</li> <li>Training provided for employee in Seruyan Estate "Pelatihan Tim Block Manuring System" dated 7 February 2023 in field C015 attended by 16 employees: mandor, and fertilizer applicators. Some topic that discuss such as safety fertilizer applications, emergency procedure if any contamination or poisonous. The worker can describe purpose of PPE usage, attending regularly medical check and safety working procedures.</li> <li>Based on field observation at Block 022B33 Division 2 Seruyan Estate, verified that pesticides are handled and applied by well-trained person. Pesticide is applied according to SOP and good agricultural practices.</li> </ul>	
7.2.7	<b>(C)</b> Storage of all pesticides in accordance with recognized best practices.	During ASA 2_1, year 2023, the auditor team has field observation, the storage for all pesticide is in good condition.  Based on filed visit (dated 8 <sup>th</sup> March 2023) to pesticides storage and interview with storage keepers of Sekunyir Estate and Seruyan Estate; found that the storage for all pesticide is in good condition.  A standard storage system appears to be implemented across by the organization. The storage is equipped with sufficient air ventilation to provide air circulation.  Hazard signs, emergency shower, secondary containment, spill kit, appropriate PPE (overall, face shield, impermeable rubber gloves, apron, and mask) is	Complied
		available and ready for use.  Working instruction for pre-mixing, stacking, and storing pesticide is current, MSDS, First Aid Kit is also readily available. Material Safety Data Sheets (MSDS) are obtained for all chemicals used and are available in the areas of mixing. These were all seen be controlled and were readily available.	

7.2.8	All pesticide containers that are disposed	All ex-pesticides containers from Estates were collected and kept in temporary waste storage for 180 up to 365 days prior disposal to the permitted parties.	Complied
	of and/or used for other purposes are managed according to applicable regulations and/or instructions on the packaging.	PT Indotruba Tengah – Sekunyir POM has prepared the procedure on disposal of waste material as per "SOP Pengelolaan Limbah B3 & Bukan B3" dated 10 January 2022.	
		The procedure describes the hazardous waste type, hazardous waste source and handling procedure. Section 5.2.8 stipulated waste contain tin and plastic send for sanitary landfill.	
		Based on field visit to Sekunyir Estate Landfill, block C07 (dated 8 <sup>th</sup> March 2022), there was found that hazardous waste from Manthene and Kencepat bags and inner bags of fertilizer disposed into domestic pile; the waste pile was not put into landfill.	
		PT Indotruba Tengah – Sekunyir POM has sent the hazardous waste produce to licence vendor PT Indo Rudy Jaya have licenced based on Ministry of Environment and Forestry Decree No. S.21/PSLB3-VPLB3/PPLB3/PLB.3/03/2020 that valid for 5 year since the issuance, (3) hazardous waste is delivered to licenced collector PT Wastec (license based on Ministry of Environment Decree No S.1090/Menlhk/Setjen/PLB.3/12/2019 dated 20 Dec 2019, valid for 5 years), (4) reporting hazardous waste to Local Environmental Agency.	
		The document on handover the hazardous waste as per "Berita Acara Serah terima Pengkutan Limbah B3", dated 24 <sup>th</sup> December 2022.	
		Manifest of hazardous waste, nomor: KLHK-1677754864, for oil used (2.94 MT $\sim$ 15 drum), was send to PT Indo Rudy Jaya (registered number	
7.2.9	<b>(C)</b> 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.	There is no pesticides applied aerially in whole area of PT. Indotruba Tengah.	Complied

7.2.10	<b>(C)</b> Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.		Complied			
		For annual medical check-up has been conducted in December 2022 was conducted by PJK3 – PT Cahaya Krisnako. Sample seen: Certificate Hasil Pemeriksaan Kesehatan Kerja, No Registrasi: 33/CPK/XII/2022 dated 17 December 2022 namely Mr Sarvina (pesticides applicator), Mr Sugianto (manuring)				
		PT Indotruba Tengah – Sekunyir POM has also provided the employees with employment and health insurance ( <i>BPJS Ketenagakerjaan and BPJS</i> Kesehatan) to cover occupational accident and medical insurance in accordance with the national regulation, which is routinely paid every month for all workers including the dependant for health insurance.				
		Data seen: the employment insurance has been paid, period January 2023. Bank Voucher number: 29/BVK/SRE/II/2023 — subject: Pembayaraan Iuran BPJS Ketenagakerjaan Februari 2023.				
7.2.11	<b>(C)</b> 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.	During filed visit and interview with female spraying workers in block 022B33 Seruyan Estate, 2 female workers stated they were pregnant and breastfeeding 2 years ago. During pregnancy and breastfeeding period of 2 years, they were moved to light works, and does not interact with chemical work and/or high-risk work.	Complied			
Referring and mills	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 pla 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 under the age of 18 for pesticide spraying. For this reason, the provisions of young workers under 18 years in indicator 7.2.11 are irrelevant.					
Criteria :	Criteria 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.					
7.3.1	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and	, , ,	Complied			



hazardous characteristics, is documented and implemented in accordance with applicable laws and regulations.

B3" dated 10 January 2022. The procedure describes the hazardous waste type, hazardous waste source and handling procedure.

PT. Indotruba Tengah – Sekunyir POM has also conducted identification on waste and pollution source, "Identifikasi Sumber-Sumber Limbah dan Pencemaran PT. Indotruba Tengah" updated on 7<sup>th</sup> January 2023, as below:

- Waste and pollution source, such as from activities from house, workshop, warehouse, laboratory, used-filter, used-rag, old-iron, used-tires, oil can, grease can, used-bulb, paper, used-helmet, chemical bottle, fertilization activity, workshop, chemical warehouse, spraying, office, housing/ mess, polyclinic, public bathroom.
- Hazardous waste such as: used-oil, emission from air pollution, used-oil can, used oil-filter, used-spare part, used rag, used-PPE, used-accumulator, usedbulb, used-sack, used-gloves, used-apron, rinse water, pesticide package, used-oil drum, used-chemical can.
- Medical hazardous waste, such as: used injection bottle used injection liquid, used-medicine waste, used-injection needle, used-gloves, expired-medicine, and medicine plastic can and abate.

Permit for hazardous waste storage "Keputusan Kepala Dinas Penanaman Modal dan Pelayanan Terpadu Satu Pintu Kabupaten Kotawaringin Barat No. 553/011/DPMPTSP-III/LH/2018 tentang Izin Penyimpanan Sementara Limbah Bahan Berbahaya dan Beracun kepada PT. Indotruba Tengah-PKS Sekunyir, dated 25 September 2018 and valid until 5 years.

PT Indotruba Tengah – Sekunyir POM has sent the hazardous waste produce to licence vendor PT Indo Rudy Jaya have licenced based on Ministry of Environment and Forestry Decree No. S.21/PSLB3-VPLB3/PPLB3/PLB3/03/2020 that valid for 5 year since the issuance, (3) hazardous waste is delivered to licenced collector PT Wastec (license based on Ministry of Environment Decree No S.1090/Menlhk/Setjen/PLB.3/12/2019 dated 20 Dec 2019, valid for 5 years), (4) reporting hazardous waste to Local Environmental Agency.

		The document on handover the hazardous waste as per "Berita Acara Serah terima Pengkutan Limbah B3", dated 24 <sup>th</sup> December 2022.	
		Manifest of hazardous waste, nomor: KLHK-1677754864, for oil used (2.94 MT $\sim$ 15 drum), was send to PT Indo Rudy Jaya (registered number at Environment Ministry: KLH-4584) dated 24 <sup>th</sup> December 2022.	
		Report on monitoring and management the hazardous waste (3 months bases) was submitted to Environment Agency as per document "Tanda Terima Elektronik – Sistem Informasi Pelaporan Elektronik Lingkungan Hidup, no: 1677665616-1261 dated 1st March 2023.	
7.3.2	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.	PT Indotruba Tengah – Sekunyir POM has prepared the procedure on disposal of waste material as per "SOP Pengelolaan Limbah B3 & Bukan B3" dated 10 January 2022.	Complied
		The procedure describes the hazardous waste type, hazardous waste source and handling procedure. Section 5.2.8 stipulated waste contain tin and plastic send for sanitary landfill.	
		Based on field visit to Sekunyir Estate Landfill, block C07 (dated 8 <sup>th</sup> March 2022), there was found that hazardous waste from Manthene and Kencepat bags and inner bags of fertilizer disposed into domestic pile; the waste pile was not put into landfill.	
		PT Indotruba Tengah – Sekunyir POM has sent the hazardous waste produce to licence vendor PT Indo Rudy Jaya have licenced based on Ministry of Environment and Forestry Decree No. S.21/PSLB3-VPLB3/PPLB3/PLB.3/03/2020 that valid for 5 year since the issuance, (3) hazardous waste is delivered to licenced collector PT Wastec (license based on Ministry of Environment Decree No S.1090/Menlhk/Setjen/PLB.3/12/2019 dated 20 Dec 2019, valid for 5 years), (4) reporting hazardous waste to Local Environmental Agency.	
		The document on handover the hazardous waste as per "Berita Acara Serah terima Pengkutan Limbah B3", dated 24 <sup>th</sup> December 2022.	



7.3.3	The unit of certification does not use open fire for waste disposal.	Manifest of hazardous waste, nomor: KLHK-1677754864, for oil used (2.94 MT ~ 15 drum), was send to PT Indo Rudy Jaya (registered number at Environment Ministry: KLH-4584) dated 24 <sup>th</sup> December 2022  Based on field visit to Seruyan Estate (dated 8 <sup>th</sup> March 2023) including housing (Perumahan Divisi I) – the waste disposal was not using fire. Audit team check to POM premise, estate offices, oil palm plantation.	Complied
Criteria	7.4: Practices maintain soil fertility at, or where possible impro	ve soil fertility to, a level that ensures optimal and sustained yield.	
7.4.1	Good agricultural practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts is documented.	Sekunyir Estate and Seruyan Estate refers to procedure related to manage soil fertility (see detail in indicator 3.3.1). The fertilizer applied was based on fertilizer recommendation from "Minamas Research Centre". Fertilizer dosage has set according to the soil needed refer to LSU and soil analysis.	Complied
7.4.2	Analysis of tissue samples (e.g. leaves) and soil on a regular basis to monitor and manage changes in soil fertility and plant health is documented.	PT. Indotruba Tengah demonstrates tissue sample analysis "Laporan Pengujian Analisa Jaringan Tanaman PT. Indotruba Tengah — Sekunyir Estate No.P13/2022" based on request letter No.011/PN & P-KTB/02/2022" dated 23 February 2022. Date of sample received on 18 March 2022, date of analysis 23 March 2022, date of issued on 25 March 2022. Analysis result shows parameter of ash, P, K Mg, Ca, N level. The analysis was carried out by Minamas Research Centre — Teluk Siak. Sample of analysis result: Lab code No.M-P-OP-202203-000427 (Sample from Division I), 5.28% Ash; 0.1610% P; 1.0190% K; 0.2770% Mg; 0.535% Ca; 2.72% N; 12.58 ppm B.	Complied
		Another report "Laporan Pengujian Analisa Jaringan Tanaman PT. Indotruba Tengah – Seruyan Estate No.P14/2022" based on request letter No.011/PN & P-KTB/02/2022 dated 23 February 2022. Date of sample received on 18 March 2022, date of analysis on 23 March 2022, date of issued on 25 March 2022. Analysis result shows parameter of ash, P, K Mg, Ca, N level. The analysis was carried out by Minamas Research Centre – Teluk Siak.	
		Sample of analysis result: Lab code No.M-P-OP-202203-000482 (Division II ), 4.75% Ash; 0.1590% P; 1.0760% K; 0.2940% Mg; 0.503% Ca; 2.67% N; 12.88 ppm B.	

	PT. Indotruba Tengah demonstrates Soil Analysis report "Hasil Analisa Tana No.020-LHU/UN8.2.1/PL/2023 Universitas Lambung Mangkurat Lembag Penelitian dan Pengabdian Kepada Masyarakat Pusat Penelitian Lingkunga Hidup", datum 9 February 2023. The soil analysis reflected the condition of C N, pF, Ca-dd, Mg-dd, Na-dd, K-dd, Al-dd. Pb, Cu, Cd, Zn and Cation Exchang Capacity.					
7.4.3	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	PT. Indot Fruit Bun "Monitorii	Empty	Complied		
	fertilisers.	Month	EFB Application Sekunyir Estate 2022 (kg)	EFB Application Seruyan Estate 2022 (kg)		
		Jan	1,098,330	535,260		
		Feb	1,078,180	552,670		
		Mar	944,310	865,000		
		Apr	1,553,140	567,050		
		May	1,591,810	729,360		
		Jun	1,993,550	872,110		
		Jul	1,473,560	839,920		
		Aug	2,017,420	821,790		
		Sept	2,316,710	702,630		
		Oct	1,639,230	602,830		
		Nov	1,551,900	951,310		



Dec	1,723,840	501,740
Total	18,981,980	8,541,670

Sekunyir Estate POME application program 2022 for organic nutrient:

Month	POME 2	022 (kg)	POME 2	.023 (kg)
MOHUH	Plan	Actual	Plan	Actual
Jan	8,971	3,376	10,065	3,781
Feb	81,189	3,329	8,971	3,370
Mar	18,034	4,068	81,189	-
Apr	15,783	5,097	18,034	-
May	18,034	4,080	15,783	•
Jun	13,783	5,716	18,034	ı
Jul	10,703	6,525	13,783	ı
Aug	10,975	6,660	10,703	1
Sept	16,200	10,097	10,975	-
Oct	14,710	9,298	16,200	-
Nov	12,560	14,961	14,710	-
Dec	10,065	5,087	12,560	-
Total	231,007	78,294	231,007	7,151

POME application applied at Block D002, D003, D005, E001, E002, E003 Sekunyir Estate.

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7.4.4	Records of fertilizer inputs are maintained.	& Realisasi Pemupu	ıkan".	ntained fertiliz	er input as on "Program	Complied
		Fertilizer input Seku	ınyir Estate:			
		Fertilizer type	2023			
		i ertilizer type	Recommendation	Actual*		
		Borat	23,563	23,563		
		AC (Ammonium chloride)	142,480	72,687		
		МОР	93,455	-		
		Dolomite	336,177	-		
		Rock Phospate	402,042	402,000		
		NK 16:28	1,487,047	253,863		
		*Data up to March	2023			
		Fertilizer input Seru	yan Estate:			
		Foutilizes to see	2023			
		Fertilizer type	Recommendation	Actual*		
		HGFB	26,007	21,150		
		ZA	126,238	-		
		CPD (16:28)	1,948,305	528,314		
		МОР	99,938	-		
		Rock Phospate	658,180	352,876		

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		Dolomite		407.4	60 10	,401			
				407,4		,401			
		CCM45		533,9	45	-			
		*Data up t	o March 2023						
Criteria	7.5: Practices minimise and control erosion and degradation of	soils.							
7.5.1	(C) Maps that identify marginal and fragile soils, including steep sloped land are available.	Indotruba Indonesia" Minamas R Based on ti Indotruba Soil type:  Soil type Haplori Kandiu	uba Tengah de Tengah, Kabup dated Februa esearch Centre he soil survey, Tengah: Sekur pe in Sekunyir l tod 740.14 Ha dult 488.71 Ha	eaten Kotawa ery 2015, ca e. there is no propries and estate and Estate compries Grossarenica, Typic Plinth	ringin Barat arried out eat soil pres d Seruyan E se of Humio Kandiudult audult 425.8	sent in operations of the sent in operations	alimantan To Data Proc ational area ot 126.98 Ha Ha, Arenic F	engah, cessing of PT. a; Ultic Plinthic	Complied
		Grossarenic Kandiudults 1,507.38 Ha, Arenic Plinthic Kandiudult 570.22 Ha, Typic Plinthudult 873.86 Ha.  Slope classification							
		Slope class		Hectarage		Total			
		(%)	( <sup>0</sup> /degree)	Sekunyir	Seruyan	Ha	%		
		0 – 4	0 – 2	3,342.11	1,684.21	5,026.31	76.44		
				•	•	· ·			
		4 – 12	2 – 6	0	1,549.26	1,549.26	23.56		
		Total		3,342.11	3,233.47	6,575.57	100		
		Based on s	lope classificat	ion, there is r	no fragile so	oil or erosior	n prone area	a.	

7.5.2	The replanting of palm oil is not conducted extensively on steep terrain in accordance with applicable regulations.	Based on field visit and slope classification as described in report of semi-detail soil survey "Survey Tanah PT. Indotruba Tengah, Kabupaten Kotawaringin Barat, Provinsi Kalimantan Tengah, Indonesia" dated February 2015, carried out by Statistic Data Processing Minamas Research Centre, there is no steep terrain in PT. Indotruba Tengah area. There is no replanting conducted in steep terrain area.  Field visit to replanting area Sekunyir Estate year 2022 block 022B001 and replanting year block 023B001 located in flat area.  Field visit to replanting area Seruyan Estate year 2022 block 022B34 located in flat area.	Complied
7.5.3	New palm oil planting is not conducted on steep terrain in accordance with applicable regulations.	<ul> <li>Based on field visit and Area Statement, there was no new planting in PT. Indotruba Tengah – Sekunyir Estate and Seruyan Estate.</li> <li>Sekunyir Estate planting years: Planting year 1992, 1993, 1994, 1995; and replanted palm from year 2013, 2014, 2015, 2018, 2019, 2020, 2021, 2022, 2023.</li> <li>Seruyan Estate planting comprise of planting year 1992, 1993, 1994; and replanted palm year 2013, 2014, 2019, 2020, 2021, and 2022.</li> <li>Oil palm planting after 1995 are replanting; and based on semi-detailed soil survey, there was no steep area in Sekuynir and Seruyan Estate. Therefore, no new planting or replanting on steep terrain.</li> </ul>	Complied
<b>Criteria</b> operation		e planning in the establishment of new plantings, and the results are incorporate	d into plans and
7.6.1	<b>(C)</b> 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.	PT. Indotruba Tengah demonstrated semi-detail soil survey "Survay Tanah PT. Indotruba Tengah, Kabupaten Kotawaringin Barat, Provinsi Kalimantan Tengah, Indonesia" dated February 2015, carried out by Statistic Data Processing Minamas Research Centre.  Based on the soil survey, there is no peat soil present in operational area of PT. Indotruba Tengah: Sekunyir Estate and Seruyan Estate.	Complied

		Haplori Kandiu • Soil Ty Grossa Typic F	oil type: Soil type in Sekunyir Estate comprise of Humic endoaquept 126.98 Ha; Ultic Haplortod 740.14 Ha, Grossarenic Kandiudults 1,560.47 Ha, Arenic Plinthic Kandiudult 488.71 Ha, Typic Plinthudult 425.81 Ha. Soil Type in Seruyan Estate comprise of Humic endoaquept 282.01 Ha; Grossarenic Kandiudults 1,507.38 Ha, Arenic Plinthic Kandiudult 570.22 Ha, Typic Plinthudult 873.86 Ha. lope classification						
		Slope clas	S	Hectarage		Total			
		(%)	(º/degree)	Sekunyir	Seruyan	На	%		
		0 – 4	0 – 2	3,342.11	1,684.21	5,026.31	76.44		
		4 – 12	2 – 6	0	1,549.26	1,549.26	23.56		
		Total		3,342.11	3,233.47	6,575.57	100		
		Based on s prone area Soil Suitabi		on, there is	no fragile so	il from steep	slopes o	r erosion	
		In general, the main li P-availabili	In general, the soil in PT. Indotruba Tengah has suitability level S3 (marginal), the main limiting factors are fertility (dominated by low acidity, low P-total and P-availability), effective medium rooting, climate (average 3-4 raining months per annum).						
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.	• Sekuny replant 2022.	Planting year in PT. Indotruba Tengah:  Sekunyir Estate planting years: Planting years 1992, 1993, 1994, 1995; and replanting palm starting year 2013, 2014, 2015, 2018, 2019, 2020, 2021, 2022.  Seruyan Estate planting comprise of planting years 1992, 1993, 1994; and				Complied		

		replanting palm starting year 2013, 2014, 2019, 2020, 2021, and 2022. Oil palm planting after 1995 is replanting. Based on field visit and report of semi-detail soil survey "Survey Tanah PT. Indotruba Tengah, Kabupaten Kotawaringin Barat, Provinsi Kalimantan Tengah, Indonesia" dated February 2015, carried out by Statistic Data Processing Minamas Research Centre, there is no marginal and fragile soils in PT Indotruba Tengah area. There is no extensive planting carried out by the unit of certification.	
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	1	Complied
Criteria	<b>7.7:</b> No new planting on peat, regardless of depth after 15 Nov	1	
7.7.1	<b>(C)</b> No new planting on peatlands, regardless of depth, after 15 November 2018, in existing plantation areas, as well as in new development areas.		Not Applicable

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			Audit team reviewed the soil survey, there are no peat soil present in operational area of PT. Indotruba Tengah: Sekunyir Estate and Seruyan Estate.	
			Soil type in Sekunyir Estate comprise of Humic endoaquept 126.98 Ha; Ultic Haplortod 740.14 Ha, Grossarenic Kandiudults 1,560.47 Ha, Arenic Plinthic Kandiudult 488.71 Ha, Typic Plinthudult 425.81 Ha.	
			Soil Type in Seruyan Estate comprise of Humic endoaquept 282.01 Ha; Grossarenic Kandiudults 1,507.38 Ha, Arenic Plinthic Kandiudult 570.22 Ha, Typic Plinthudult 873.86 Ha.	
			Based on the same survey information, there was no new planting in PT. Indotruba Tengah – Sekunyir Estate and Seruyan Estate.	
			Sekunyir Estate planting comprise of Planting year 1992, 1993, 1994, 1995, 2013, 2014, 2015.	
			Seruyan Estate planting comprise of planting year 1992, 1993, 1994, 2013, 2014.	
	7.7.2	Peat areas within the managed area are inventoried, documented and reported to the RSPO Secretariat (effective from November 15, 2018).	Audit team review semi-detail soil survey "Survey Tanah PT. Indotruba Tengah, Kabupaten Kotawaringin Barat, Provinsi Kalimantan Tengah, Indonesia" dated February 2015, carried out by Statistic Data Processing Minamas Research Centre.	Not Applicable
			Based on the soil survey, there are no peat soil present in operational area of PT. Indotruba Tengah: Sekunyir Estate and Seruyan Estate.	
			Soil type in Sekunyir Estate comprise of Humic endoaquept 126.98 Ha; Ultic Haplortod 740.14 Ha, Grossarenic Kandiudults 1,560.47 Ha, Arenic Plinthic Kandiudult 488.71 Ha, Typic Plinthudult 425.81 Ha.	
			Soil Type in Seruyan Estate comprise of Humic endoaquept 282.01 Ha; Grossarenic Kandiudults 1,507.38 Ha, Arenic Plinthic Kandiudult 570.22 Ha, Typic Plinthudult 873.86 Ha.	
			-	

**PROCEDURAL NOTE:** Maps and other documentation for peatlands are provided, prepared and shared according to the RSPO Working Group (Peatland Working Group / PLWG) audit guide (See Procedural Notes for Indicator 7.7.5 below).

7.7.3	<b>(C)</b> Subsidence of peat is monitored, documented and minimised.	Based on semi-detail soil survey "Survey Tanah PT. Indotruba Tengah, Kabupaten Kotawaringin Barat, Provinsi Kalimantan Tengah, Indonesia" dated February 2015, carried out by Statistic Data Processing Minamas Research Centre.	Not Applicable
		Based on the soil survey, there is no peat soil present in operational area of PT. Indotruba Tengah: Sekunyir Estate and Seruyan Estate.	
		Soil type in Sekunyir Estate comprise of Humic endoaquept 126.98 Ha; Ultic Haplortod 740.14 Ha, Grossarenic Kandiudults 1,560.47 Ha, Arenic Plinthic Kandiudult 488.71 Ha, Typic Plinthudult 425.81 Ha.	
		Soil Type in Seruyan Estate comprise of Humic endoaquept 282.01 Ha; Grossarenic Kandiudults 1,507.38 Ha, Arenic Plinthic Kandiudult 570.22 Ha, Typic Plinthudult 873.86 Ha.	
7.7.4	<b>(C)</b> Availability of implementation evidence of the water and land cover management program.	Based on the soil survey, there is no peat soil present in operational area of PT. Indotruba Tengah: Sekunyir Estate and Seruyan Estate.	Not Applicable
		However, plantation manages the water and land cover program:	
		Monitoring and managing soil erosion and mitigation of cover crop, terrace, frond stacking in "U" shape, good fertilizer regime for 2,300.60 Ha plantation in Sekunyir Estate and 1,507.38 Ha in Seruyan Estate.	
7.7.5	<b>(C)</b> 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	Based on semi-detail soil survey "Survey Tanah PT. Indotruba Tengah, Kabupaten Kotawaringin Barat, Provinsi Kalimantan Tengah, Indonesia" dated February 2015, carried out by Statistic Data Processing Minamas Research Centre.	Not Applicable
	results of the assessment are used to determine the period	Based on the soil survey, there are no peat soil present in operational area of PT. Indotruba Tengah: Sekunyir Estate and Seruyan Estate.	
	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	Soil type in Sekunyir Estate comprise of Humic endoaquept 126.98 Ha; Ultic Haplortod 740.14 Ha, Grossarenic Kandiudults 1,560.47 Ha, Arenic Plinthic Kandiudult 488.71 Ha, Typic Plinthudult 425.81 Ha.	



	better suited for higher groundwater levels (paludiculture) or rehabilitated with natural vegetation.	Soil Type in Seruyan Estate comprise of Humic endoaquept 282.01 Ha; Grossarenic Kandiudults 1,507.38 Ha, Arenic Plinthic Kandiudult 570.22 Ha, Typic Plinthudult 873.86 Ha.	
Guidelines January 2 communit managem refined as	s currently being adjusted / tested by the RSPO Working Group 1019 and will include additional Guide on the steps to be foll ties, and the unit of certification concerned. It is recommend ent units (ie management units that have plantations on peat)	rainability Assessment Guide along with related concepts and detailed actions is on Peatlands (Peatland Working Group / PLWG). The final version must obtain P lowed after deciding not to replant and the consequences for other stakeholders led that the trial methodology period is proposed to be extended for 12 months) to utilize the methodology and provide input to PLWG so that existing procedure option to delay replanting until the issuance of the revised Guidelines for the guide egetation will be regulated by the PLWG.	LWG approval in s, farmers, local for all relevant es can be further
7.7.6	(C) All existing plantations on peat are managed according to applicable laws and/or "RSPO Guidelines for Best Management Practices (BMP) for Oil Palm Cultivation that are already on Peatlands", version 3 (June 2019) along with related audit guidelines (May 2019).	Kabupaten Kotawaringin Barat, Provinsi Kalimantan Tengah, Indonesia" dated February 2015, carried out by Statistic Data Processing Minamas Research	Not Applicable
7.7.7	<b>(C)</b> 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	Kabupaten Kotawaringin Barat, Provinsi Kalimantan Tengah, Indonesia" dated February 2015, carried out by Statistic Data Processing Minamas Research	Not Applicable



	Management and Rehabilitation of Natural Vegetation related to Oil Palm Cultivation that already exists in Peatlands' (the latest version) along with relevant audit	Soil type in Sekunyir Estate comprise of Humic endoaquept 126.98 Ha; Ultic Haplortod 740.14 Ha, Grossarenic Kandiudults 1,560.47 Ha, Arenic Plinthic Kandiudult 488.71 Ha, Typic Plinthudult 425.81 Ha.	
	guidelines.	Soil Type in Seruyan Estate comprise of Humic endoaquept 282.01 Ha; Grossarenic Kandiudults 1,507.38 Ha, Arenic Plinthic Kandiudult 570.22 Ha, Typic Plinthudult 873.86 Ha.	
Criteria	7.8: Practices maintain the quality and availability of surface ar	nd groundwater.	
7.8.1	A water management plan is available and is implemented to support efficient use of water sources and continuous availability and avoid negative impacts on other users in the catchment. The plan referred to contains the following matters:	During ASA 2.1 – year 2023, PT Indotruba Tengah – Sekunyir POM has Procedure is in place, SOP Pengelolaan Sempadan Sungai/Waduk, Daerah Aliran Sungai & Areal Konservasi No.HCV-SAA/07/2009" dated 1 June 2009. Purpose to maintain the riparian/buffer zone, lake buffer zone, water spring buffer zone and waterways buffer zone.	Complied
	7.8.1a The unit of certification does not limit access to clean water or does not pollute the water used by the community.	The procedure was developed to maintain and protect the water source quality. Procedures were also established for protection and management of riparian buffer zones at or before replanting. Procedure mentioned that in area of buffer zones are prohibited to apply agrochemical, used manual manuring and riverbank was planted by erosion barrier crop. The organization has a policy that prohibits estates for planting in the left and right side of riparian buffer zones at or before replanting. A warning board placed regarding prohibition to apply agrochemicals and fertilizer in the buffer zone. Riparian buffers of small natural river were 10 - 15 m wide on both sides of the rivers, depending on the wide of river, lake buffer 50 m: water spring buffer 50 m.	
		PT. Indotruba Tengah – Sekunyir POM have established a water management plan, consist of management water supply for domestic, water consumption and measurement of water quality. Identification water need as regulated in "Peraturan Menteri PU No.14/PRT/M/2010 (domestic consumption is 60 liters/person/day and water needed for mill processing, ground and surface water resources and its permit, management, and monitoring wastewater, included domestic wastewater.	



	such as surface wateriver and downstread available in the report of PT Indotruba Tengal to ensure the complistandard Class IV.  Based on report of RKL/RPL period July national regulation.	er management has been er quality monitoring ear m Blok F10 river. Report of RKL/RPL period Julin – Sekunyir POM has arance against PP No. 82  water quality monitor – December 2022 show the company does not rused by the communit	ch semester at Upstre ort of water quality m y – December 2022. nalysed water quality e tahun 2001 regarding ing are available in t ws that water quality of limit access to clean w	eam Blok D12 onitoring are ach semester water quality the report of complies with	
7.8.1b Workers have adequate access to clean water.	workers through wa Seruyan Estate. Reg semester to ensure No. 32 Tahun 2017	h – Sekunyir Palm Oil I ter treatment with raw ular monitoring of wate the water use by worke regarding clean water quallysis October 2022 –	water from Pond at requality has been car are is met with standar uality standard.	Sekunyir and ried out each rd Permenkes	
	Parameter	Standard	Result		
	Odor	No odor	No odor		
	TDS	1000 mg/L	21 mg/L		
	Taste	5. 5.			
	Color	50 TCU	<3.21 TCU		
	Turbidity	25 NTU	0.61 NTU		
	Hg	0.001 mg/L	<0.000003 mg/L		
	Fe	1.0 mg/L	<0.0071 mg/L		

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		FI	1.5 mg/L	<0.004 mg/L		
		Cd	0.005 mg/L	<0.0021 mg/L		
		CaCO3	500 mg/L	36.1 mg/L		
		Cr6	0.05 mg/L	<0.0020 mg/L		
		Mg	0.5 mg/L	<0.0071 mg/L		
		pН	6.5-8.5	6.23		
		Zn	15 mg/L	<0.0051 mg/L		
		Si	0.1 mg/L	<0.0042 mg/L		
		Pb	0.05 mg/L	<0.0012 mg/L		
		KMnO4	10 mg/L	0.1 mg/L		
		E. Coli	0 CFU/100 ml	0 CFU/100 ml		
		Total Coliform	50 CFU/100 ml	41 CFU/100 ml		
		quality generally is n	d by Laboratory PT. Munet with the standard (I/20. Hence the waters.	Report of Testing No.	1645, 1646,	
7.8.2	<b>(C)</b> 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).	Procedure is in place, SOP Pengelolaan Sempadan Sungai/Waduk, Daerah Aliran Sungai & Areal Konservasi No.HCV-SAA/07/2009" dated 1 June 2009. Purpose to maintain the riparian/buffer zone, lake buffer zone, water spring buffer zone and waterways buffer zone. The procedure was developed to maintain and protect the water source quality. Procedures were also established for protection and management of riparian buffer zones at or before replanting. Procedure mentioned that in area of buffer zones are prohibited to apply agrochemical, used manual manuring and riverbank was planted by erosion barrier crop.				Complied

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		The organization has a policy that prohibits estates for planting in the left and right side of riparian buffer zones at or before replanting. A warning board placed regarding prohibition to apply agrochemicals and fertilizer in the buffer zone. Riparian buffers of small natural river were 10 - 15 m wide on both sides of the rivers, depend on the wide of river; lake buffer 50 m; water spring buffer 50 m. Seruyan Estate and Sekunyir Estate made monitoring of buffer zone and report in "Monitoring Area Nilai Konservasi Tinggi (NKT)" period January – December 2022 indicating the signboard for buffer zone, vegetation and tree condition in buffer zone, vegetation in the water way, presence of water life, etc. No signs of pollution of illegal logging in buffer zones.	
		<ul> <li>Based on Record of Monitoring Area Nilai Konservasi Tinggi (NKT)" period January – December 2022, shown that, updated water management plan such as:</li> <li>Reduce-reuse-recycle Re-use wastewater from sprayer's washing shed for spraying activities; use water from last water pond in washing shed for drier box in other (rubber plantation) entity; using water dilution from fresh water to ex-condensate from sterilizer – period Jan-Dec 2023.</li> </ul>	
		Managing water source: identification of water source Feb 2023; no chemical application surrounding water source in Jan-Dec 2023; install signboard to remind water source protection in Dec 2023; water quality testing on regular basis in June 2023; installation of rainwater container – Jan-Dec 2023	
7.8.3	Mill effluent is managed according to applicable regulations. The quality of mill effluent discharged, especially BOD (Biochemical Oxygen Demand) is monitored in accordance with applicable regulations.	During ASA 2_1-year 2023, PT Indotruba Tengah — Sekunyir Palm Oil has demonstrated that mill effluent is managed according to applicable regulations. PT Indotruba Tengah— Sekuinyir Palm Oil Mill has an effluent treatment through treated ponds system.	Complied
		To ensure the commitment on waste management implementation, the Certificate Holder has had permit of liquid wastewater management for Land Application according to "Keputusan Kepala Dinas Penanaman Modal dan Pelayanan Terpadu Satu Pintu Kabupaten Kotawaringin Barat No. 503/010/LH/DPMPTSP.D tentang Izin Pembuangan Air Limbah Kepada	

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Perkebunan Kelapa Sawit PT. Indotruba Tengah" dated 10 July 2020 valid until 30 June 2025.

BOD monitoring effluent tested each month by accredited laboratory (PT Persada Laboratory Mojokerto) according to standard threshold PerMenLH No. 29 tahun 2003

Below is the record of effluent monitoring from January 2022 – January 2023:

Month		BOD (mg/L)	COD
(2022)	Certificate No.	National Threshold 5,000 mg/L	COD (mg/L)
January	0257/PKN/I/22	478	1,131
February	0543/PKN/II/22	1,191	4,830
March	0939/PKN/III/22	1,429	2,609
April	1309/PKN/IV/22	1,901	5,325
May	1753/PKN/V/22	2,942	4,963
June	2256/PKN/VI/22	1,111	6,175
July	2728/PKN/VII/22	2,159	5,581
August	14871/VIII/22	1,180	2,350
September	0038/IX/2022	920	2,100
October	0073/X/2022	1,377	2,959
November	0120/IX/2022	2,950	2,791
December	0237/XII/2022	1,280	3,673
January - 2023	016/I/2023	1,065	530



				shown that BOD pangan Hidup No. 29	arameter met regulatio tahun 2003".	n
7.8.4	Mill water use per tonne of FFB is monitored and recorded.	During ASA 2_1-year 2023, Sekunyir Palm Oil Mill has shown the record on monthly monitoring of mill water consumption per tonne FFB processed. The records are maintained under "Rekap Pemakaian Air Tahun 2022".  Monitoring of mill water use per ton FFB in January 2022 – January 2023, as below table:				
		Month (2022)	FFB Process (MT)	Water Usage (m³)	Average (m³/MT FFB)	
		January	7,618	11,873	1.56	
		February	6,951	8,289	1.19	
		March	9,412	9,958	1.06	
		April	11,168	12,207	1.09	
		May	11,372	13,390	1.18	
		June	13,766	15,528	1.13	
		July	10,989	12,553	1.14	
		August	11,830	11,789	1.00	
		September	10,650	10,899	1.02	
		October	9,449	10,288	1.09	
		November	10,474	11,660	1.11	
		December	9,813	10,486	1.07	
		January - 2023	7,970	9,462	1.19	

			e above can be show IT FFB and it is still				
Criteria	7.9: Efficiency of fossil fuel use and the use of renewable energy	gy is optimised					
7.9.1	Plans to increase the efficiency of fossil fuel use and to optimize renewable energy are available, monitored and documented	improving efficience fossil fuel receinclude accurate processed. All fuel usage is reference fossil fuel receinclude accurate processed.  PT Indotrubatuse. All the shusage is record to reduce use install grid electrons.	During ASA 2_1-year 2023, PT Indotruba Tengah has prepared the program for improving efficiency of the use of fossil fuels and to optimize renewable energy. Fossil fuel records are maintained, and the trends shown. Energy use records include accurate measurements of renewable energy use per ton of FFB processed. All the shell and fiber are consumed internally as boiler fuel. Fossil fuel usage is recorded for operational purpose, including the efficiency analysis. Fossil fuel records are maintained, and the trends shown. Energy use records include accurate measurements of renewable energy use per ton of FFB				Complied
		Period (2022)	FFB porcess (MT)	Fibre usage (MT)	Shell usage (MT)		
		January	7,618	1,047	521		
		February	6,951	955	476		
		March	9,412	1,294	644		
		April	11,168	1,535	765		



		May June	11,372 13,766	1,563 1,892	778 942		
		July	10,989	1,510	752		
		August	11,830	1,626	810		
		September	10,650	1,464	729		
		October	9,449	1,299	647		
		November	10,474	1,440	717		
		December	9,813	1,349	672		
		Total	122.404	16.000	0.470		ĺ
Criteria	7.10: Plans to reduce pollution and emissions, including greenho		, are developed, imp	emented and mor	8,459	w developme	nts are desig
	7.10: Plans to reduce pollution and emissions, including greenhouse GHG emissions.  (C) GHG emissions for the unit of certification are identified and assessed. Plans to reduce or minimize GHG emissions are implemented.	PT Indotruba Te greenhouse gas	, are developed, imp engah – Sekunyir PO emission – year 202	emented and mor  M has identified t  2.	nitored and ne	of source of	ents are desig
to minim	ise GHG emissions.  (C) GHG emissions for the unit of certification are identified	PT Indotruba Te greenhouse gas The sources of G - Methane from	engah – Sekunyir PO emission – year 202 GHG as per GHG Calo m POME and compos	emented and more M has identified to 2. culation report 20 sting at mill	he document 22, as listed b	of source of	T
to minim	(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	PT Indotruba Te greenhouse gas The sources of G - Methane from	engah – Sekunyir PO emission – year 202 GHG as per GHG Calo m POME and composemissions from vehicle	emented and more M has identified to 2. culation report 20 sting at mill	he document 22, as listed b	of source of	T
to minim	(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	PT Indotruba Te greenhouse gas The sources of G - Methane from - Fossil fuels e - Chemical fert - Electricity use	engah – Sekunyir PO emission – year 202 GHG as per GHG Calo m POME and compos emissions from vehicl tilizer age	emented and more M has identified to 2. culation report 20 sting at mill	he document 22, as listed b	of source of	T
to minim	(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	PT Indotruba Te greenhouse gas The sources of G - Methane from - Fossil fuels en - Chemical fert - Electricity usa - Chemical spra	are developed, implengah – Sekunyir PO emission – year 202 GHG as per GHG Calon m POME and composemissions from vehicle tilizer age	emented and more M has identified to 2. Culation report 20 sting at mill es and engines (g	he document 22, as listed b	of source of	T
to minim	(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	PT Indotruba Te greenhouse gas The sources of G - Methane from - Fossil fuels en - Chemical fert - Electricity usa - Chemical spra	are developed, implengah — Sekunyir PO emission — year 202 GHG as per GHG Calo m POME and compos emissions from vehicle tilizer age raying or minimize GHG em	emented and more M has identified to 2. Culation report 20 sting at mill es and engines (g	he document 22, as listed b	of source of	T

• Reduce chemical fertilizer using EFB composting.

		The records of each programmed were sighted as evident implementation. The program included objectives, targets, and timelines for a year. There was monitoring and evaluation every 6 months to ensure the target was achieved. Sekunyir Palm Oil Mill wastewater was processed through a series of wastewater treatment ponds four anaerobic ponds. Process parameter monitoring and maintenance of the ponds were sighted. Quality of wastewater effluent is monitored monthly in line with the requirements on Kepmen LH 29/2003. The results of monitoring of wastewater effluent were reviewed including measurement of BOD, COD, oil and fat, N total result of discharge effluent conforms to the limits for parameters for period January 2022 – January 2023 (see 7.8.3). Wastewater effluent monitoring was conducted by Laboratory PT Persada Laboratory Mojokerto.  PT Indotruba Tengah – Sekunyir POM already maximize the renewable energy use also to reduction in electricity. All the shell and fiber are consumed internally as boiler fuel. Fossil fuel usage is recorded for operational purpose, including the efficiency analysis.  Implementing IPM to reduce pesticides usage. Planting and maintenance beneficial plant 20% <i>Antigonon leptopus</i> , 20% <i>Turnera subulata</i> , 60% <i>Cassia tora</i> programmed in Januariy – December 2023.PalmGHG calculator for year 2022 (January – December 2022) reviewed and approved. See appendix for PalmGHG result.	
7.10.2	<b>(C)</b> 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).	During ASA 2_1-year 2023, the auditor team has reviewed the document and field visit, there was confirmed that no new planting in Sekunyir Estate and Seruyan Estate.  PT. Indotruba Tengah has identified the significant pollutants and greenhouse gas (GHG) emissions.  Significant pollutants and GHG such as:  • Emission,	Complied

		<ul> <li>Particulate,</li> <li>Noise from boiler and generator,</li> <li>Effluent from mill wastewater,</li> </ul>	
		<ul><li>Fertilizer application,</li><li>Chemical applicator, and</li></ul>	
		Transport of FFB.	
		Monitoring of air emissions and ambient air quality conducted every semester. Emissions test conducted testing by Accreditation Laboratory Laboratory PT Unilab Persada. The results of the analysis have been demonstrated and reported to Environmental Agency every six months, e.g: Subject of analysis for air emission and Air Ambient in Sekunyir Palm Oil Mill and Estate and Seruyan Estate.	
		Sample seen: Report of Analysis No: LPUP03563, parameter: air emission, location in: Cerobong Boiler No 3 in Sekunyir POM, dated 3 June 2022. The result has been complied with Peraturan Menteri Lingkungan Hidup No 07 tahun 2007, appendix 1.	
7.10.3	<b>(C)</b> Other significant pollutant identification results are available and plans to reduce or minimize them are implemented and monitored.		Complied
		Plans to reduce or minimize GHG emissions, such as:  • Zero burning	

7.11.1	<b>(C)</b> Land for new planting or replanting is not prepared by burning.	Sekunyir Estate planting years: Planting year 1992, 1993, 1994, 1995, 2013, 2014, 2015, 2018, 2019, 2020, 2021, 2022 and 2023 (recently replanting). Seruyan Estate planting comprise of planting year 1992, 1993, 1994, 2013, 2014, 2019, 2020, 2021, and 2022.	Complied
Criteria 7	7.11: Fire is not used for preparing land and is prevented in the	e managed area.	
		Implementing IPM to reduce pesticides usage. Planting and maintenance beneficial plant 20% <i>Antigonon leptopus</i> , 20% <i>Turnera subulata</i> , 60% <i>Cassia tora</i> programmed in Januariy – December 2023.	
		PT Indotruba Tengah – Sekunyir POM already maximize the renewable energy use also to reduction in electricity. All the shell and fiber are consumed internally as boiler fuel. Fossil fuel usage is recorded for operational purpose, including the efficiency analysis.	
		The results of monitoring of wastewater effluent were reviewed including measurement of BOD, COD, oil and fat, N total result of discharge effluent conforms to the limits for parameters for period January 2022 – January 2023 (see 7.8.3). Wastewater effluent monitoring was conducted by Laboratory PT Persada Laboratory Mojokerto.	
		Sekunyir Palm Oil Mill wastewater was processed through a series of wastewater treatment ponds four anaerobic ponds. Process parameter monitoring and maintenance of the ponds were sighted. Quality of wastewater effluent is monitored monthly in line with the requirements on Kepmen LH 29/2003.	
		The records of each programmed were sighted as evident implementation. The program was including objectives, targets, and timelines for a year. There was monitoring and evaluation every 6 months to ensure target was achieved.	
		<ul> <li>Utilization of waste fibre and shell as boiler fuel and electricity from turbines</li> <li>Reduce chemical fertilizer using EFB composting</li> </ul>	

	<u> </u>	,	
		There was no new planting in PT. Indotruba Tengah – Sekunyir Estate and Seruyan Estate. At the current assessment (RAV), unit of certification conducted replanting in Seruyan Estate in 2022. Replanting prepared by felling and chipping, none of the area performed burning for replanting. Contract of replanting was available under "Addendum Surat Perjanjian Kerja No.006/Replanting/ITH-SRE/IV/2019" dated 26 February 2021, between PT. Indotruba Tengah and PT. Karya Murni Prima. The contract covers work specification, such as: removal of weevil and roots; felling & chipping; digging and re-closing the former boulder and soil; leveling, chambering & compacting harvesting path; mechanical planting hole; plowing & harrowing; terracing; close-ended conservation trenches (CECT) for coastal and lowland area; silt pit; and ridge – for 180 SPH.  Based on field visit to estates (C033 Division 2 Seruyan Estate) and interview	
		with replanting contractor, there is no evidence of fire usage on the ground.	
		Based on field visit to estates (B001 Division 2 Sekunyir Estate) and interview with replanting mandor, replanting using manual method: felling, chipping, CECT, and no use of fire usage on the ground.	
7.11.2	The unit of certification establishes fire prevention and control measures for lands that are directly managed by the unit of certification.	Unit of certification has established procedure of Land Fire Prevention and Control as in "Pedoman Pencegahan dan Penanggulangan Kebakaran" (7302/PSQM-ESH/14 Rev.1 dated 23 February 2018). The procedure describing fire prevention and control measures as follow:	Complied
		1. Fire Prevention;	
		Team formation increase readiness, tools checking, identification, invention, establish signboard and tower, cooperation with surrounding communities, dissemination to surrounding communities, conduct monitoring, implementation of zero burning during replanting.	
		2. Fire Control;	

		Identification of location, be aware of fire source, control by patrol team, fire control team, request assistance from nearest company or report to	
		relevant government, evaluation of fire control.	
		Fire Response Team with appropriate resources also provides in all area and registered by relevant agency. The fire fighting tools and equipment have been checked as per regulation "Peraturan Menteri Pertanian No.5/KB.410/1/2018 tentang Pembukaan dan/atau Pengolahan Lahan Perkebunan Tanpa Bakar". Fire watch tower also available in each estate to monitor fire adjacent the plantation.	
		- Fire patrol "Form Monitoring Patroli Kebakaran Lahan Seruyan Estate" – period February 2023, no fire incident.	
		- Fire tower monitoring book "Buku Monitoring Menara Api Blok E15/16 Sekunyir Estate" period January 2023 stated no fire incident.	
		Report of Fire prevention & control to the relevant government body was available:	
		- Fire monitoring and fire-fighting report "Laporan Pemantauan Kebakaran Dalam Kebun Periode Juli-Desember 2022 Sekunyir Estate" handed over to Kepala Badan Lingkungan Hidup Kabupaten Kotawaringin Barat" sent on 2 January 2023. Report stated no fire incident inside Seruyan Estate.	
		Fire monitoring and fire-fighting report "Laporan Pemantauan Kebakaran Dalam Kebun Periode Juli-Desember 2022 Seruyan Estate" handed over to Dinas Kehutanan dan Perkebunan Kabupaten Seruyan" sent on 12 January 2023. Report stated no fire incident inside Seruyan Estate.	
7.11.3	The unit of certification engages stakeholders in adjacent locations for fire prevention and control measures.	Based on information during interview with local communities, acknowledge that coordination for fire control between unit of certification and adjacent communities are involved and engaged.	Complied
	•	Company engage surrounding community and government to explain company procedures on fire monitoring, prevention and fire-fighting; to surrounding communities from villages, 7 July 2022. 23 persons attended from Pangkalan Banteng district, Hanau district, Amin Jaya village, Sungai Pakit village.	



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

#### **PROCEDURAL NOTE for 7.12:**

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

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

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

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

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

7.12.1	(C) Land clearing since November 2005 has not damaged
	primary forest or any area required to protect or enhance
	HCVs. Land clearing since 15 November 2018 has not
	damaged HCV or HCS forests.

Historical analysis of Land Use Change Analysis (LUCA) is carried out before any new land clearing, in accordance with the RSPO LUCA Guidance document (see indicator 7.12.2).

There is no land cleared since 15 November 2018 without prior HCV-HCS assessment. There is no new planting. Unit of certification has started planting in 1992, no new planting area/developing area since November 2005 and 2014/2018. Replanting has been performed since 2013 - 2015.

HCV assessment has been conducted by PT. Indotruba Tengah cooprated with independent Consultant Aksenta in August 2009. The HCV report documented in the "Laporan Identifikasi High Conservtion Value PT. Indotruba Tengah, Kabupaten Kotawaringin Barat & Seruyan Provinsi Kalimantan Tengah, January 2010". HCV Assessment was conducted using HCV Toolkit Indonesia 2008.

Based on communication with RSPO Secretariat dated 7 March 2022, BSI obtain statement" The unit has already been disclosed and RaCP is not applicable".

Complied



7.12.2 **(C)** HCV and HCS forests, and other conservation areas are identified as follows:

7.12.2a) For existing plantations, with an HCV assessments conducted by RSPO- approved assessors and have no new land clearing after 15 November 2018, the existing HCV assessments remains valid.

No changes on HCV document.

HCV assessment has been conducted by PT. Indotruba Tengah cooperated with independent Consultant Aksenta in August 2009. The HCV report documented in the "Laporan Identifikasi High Conservtion Value PT. Indotruba Tengah, Kabupaten Kotawaringin Barat & Seruyan Provinsi Kalimantan Tengah, January 2010".

HCV Assessment was conducted using HCV Toolkit Indonesia 2008. The team consist of four members as following:

- 1. Wibowo A. Djatmiko (Team leader: Ecological habitat/wildlife)
- 2. Bambang Widyatmoko (GIS, Mapping, Environmental Services)
- 3. Gani Gunawan (Social, economic and cultural)
- 4. Erwin Hermawan (GIS expert)

All of them list as HCV RSPO approved assesor.

Based on the assessment report, in Sekunyir and Seruyan Estate there are three (4) types of HCV been identified: HCV 1.2 (Endangered Species), HCV 4.1 & 4.2 (riparian area), and HCV 1.3 (swamp refugia) with total HCV area 76.56 Ha (Seruyan Estate 45.8 Ha + Seruyan Estate 45.48 Ha).

There are identify the important RTE species identify (based on information from surrounding community and presence of animal): *Pongo pygmaeus* (orangutan), *Helarctos malayanus* (beruang madu), *Manis javanica* (trenggiling) and *Spilornis cheela* (Elang ular bido).

HCV public consultation was held on 25 August 2009. Attended by local authorities, local communities, and company representative.

Assessment conducted on the whole plantation that has been embedded and the areas around the plantation include rivers, forests, and others.

Complied



	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.	There is no new planting after 15 November 2018. Unit of certification has started planting in 1992, no new planting area/developing area since November 2005 and 2014/2018. Replanting has been performed since 2013 - 2015. This indicator is not applicable.	
7.12.3	<b>(C)</b> 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.	Not applicable for Indonesia. This indicator is not applicable.	Not Applicable
	URAL NOTE for 7.12.3:		
Indicator	7.12.3. is not relevant to Indonesia, until further decisions by t	he RSPO.	
7.12.4	<b>(C)</b> 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	assessment. There is no new planting. Unit of certification has started planting	Complied
	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).	Kabupaten Kotawaringin Barat & Seruvan Provinsi Kalimantan Tengah, January	
		HCV Assessment was conducted using HCV Toolkit Indonesia 2008. The team consist of four members as following:	
	ievel considerations (where these are identified).	1. Wibowo A. Djatmiko (Team leader: Ecological habitat/wildlife)	
		2. Bambang Widyatmoko (GIS, Mapping, Environmental Services)	
		3. Gani Gunawan (Social, economic, and cultural)	



#### 4. Erwin Hermawan (GIS expert)

All of them list as HCV RSPO approved assesor.

Based on the assessment report, in Sekunyir and Seruyan Estate there are three (4) types of HCV been identified: HCV 1.2 (Endangered Species), HCV 4.1 & 4.2 (riparian area), and HCV 1.3 (swamp refugia) with total HCV area 76.56 Ha (Seruyan Estate 45.8 Ha + Seruyan Estate 45.48 Ha).

There are identify the important RTE species identify (based on information from surrounding community and presence of animal): *Pongo pygmaeus* (orangutan), *Helarctos malayanus* (beruang madu), *Manis javanica* (trenggiling) and *Spilornis cheela* (Elang ular bido).

HCV public consultation was held on 25 August 2009. Attended by local authorities, local communities, and company representative.

Assessment conducted on the whole plantation that has been embedded and the areas around the plantation include rivers, forests, and others.

Management plan contained ongoing monitoring of status of HCV, HCS, other natural ecosystems, peatland conservation areas and RTE species have been developed.

Monitoring report of HCV sighted and verified for period January to February 2023. Refer to HCV Assessment Report and Management plan contained ongoing monitoring of status of HCV, HCS, other natural ecosystems, peatland conservation areas and RTE species have been developed.

HCV program that implemented by unit of certification is more concern to monitor any threat activities near watercourse/riparian and wildlife animal monitoring.

Based on communication with RSPO Secretariat dated 7 March 2022, BSI obtain statement" the unit has already been disclosed and RaCP is not applicable".

PT. Indotruba Tengah made communication/socialization of HCV and protected species on 17 July 2021. The meeting also explains the monitoring result, as well as management and monitoring plan. Attended by Pembuang Hulu II

		villagers, Sungai Pakit villagers, Derangga villagers, Karang Mulya villagers, BPD Pangkalan Banteng.	
7.12.5	Where rights of local communities have been identified in HCV areas and HCS forest after 15 November 2018, peatland and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.	started planting in 1992, no new planting area/developing area since November 2005 and 2014/2018. Replanting has been performed since 2013 - 2015.	Complied
7.12.6	All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.	(employees or villagers) who across the plantation is understood that animal is	Complied



Company has monitor the RTE species and HCV area regularly in monthly basis. Based on document Monitoring of Flora and Fauna PT. Indotruba Tengah, there were animal presence in PT. Indotruba Tengah categorized as RTE species and protected species by national regulation: Kucing hutan (*Felis bengalensis*), Alapalap putih (*Elanus hipolecus*), Burung kuntul (*Bubulcus ibis*), Burung belibis (*Dendrocygna javanica*), Burung cucuk udang (*Alcedo caerulescens*).

Policy or rules to protect RTE species included in "SOP Pengelolaan Sempadan Sungai/Waduk (DAS) & Areal Konservasi No.01/HCV-SAA/07/2009" dated 1 June 2009. Section O stipulates prohibit to purposely cutting trees or shrub in the buffer area. Section P, stipulates all activities including felling trees, replanting in buffer area is prohibit. Section U stated prohibit hunting and poaching flora and fauna in buffer area. Section W stated if employees or communities found purposely damaging, taking advantage, or activity adversely impacting the buffer area will be processed against law.

Appropriate disciplinary measures imposed in accordance with company rules and national law, should any individual working for Unit of certification is found to have captured, harmed, collected, or killed any RTE species implemented. PT. Indotruba Tengah has "SOP Penanganan Satwa Liar No.01/MAS/-SOP/09" dated 1 June 2009. Section 4.1 stipulates company will perform communication and socialization and convey: employee and contractor are not allowed to capture, pet, or kill RTE species; employee and contractor are not allowed to trade wildlife, sanction will be sacking or contract cancellation. All wildlife found will be seized and sent for rehabilitation, release in local area, hand over to government body for conservation.

Programme to regularly educate the workforce about the status of the RTE species is implemented. PT. Indotruba Tengah has "SOP Penanganan Satwa Liar No.01/MAS/-SOP/09" dated 1 June 2009. Section 4.1, stipulates company will perform communication and socialization and convey company will educate and suggest employee and contractor to pet or hunt wildlife through socialization, briefing and signboard no hunting.

		Inspections conducted as recorded "Form Identifikasi Fauna di Kawasan Perkebunan Kelapa Sawit Seruyan Estate". Period January to February 2023 found monitoring lizard ( <i>Varanus salvator</i> ), Crested Serpent-eagle ( <i>Spilornis cheela</i> ), Cobra ( <i>Naja sp.</i> ), Long tailed macaque ( <i>Macaca fascicularis</i> ), Greater coucal ( <i>Centropus sinensis</i> ), common treeshew ( <i>Tupaia glis</i> ); no traps/snares put up within or nearby areas.  PT Indotruba Tengah regularly educated the workforce about the status of RTE through conducted training, example: date 13 January 2023. The socialization attended by 76 employees in Sekunyir Estate	
7.12.7	The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.	There is no new planting after 15 November 2018. Unit of certification has started planting in 1992, no new planting area/developing area since November 2005 and 2014/2018. Replanting has been performed since 2013 - 2015.  HCV assessment has been conducted by PT. Indotruba Tengah cooperated with independent Consultant Aksenta in August 2009. The HCV report documented in the "Laporan Identifikasi High Conservtion Value PT. Indotruba Tengah, Kabupaten Kotawaringin Barat & Seruyan Provinsi Kalimantan Tengah, January 2010". HCV Assessment was conducted using HCV Toolkit Indonesia 2008.  Management plan contained ongoing monitoring of status of HCV, HCS, other natural ecosystems, peatland conservation areas and RTE species have been developed.  Monitoring report of HCV sighted and verified for period January to February 2023. Refer to HCV Assessment Report and Management plan contained ongoing monitoring of status of HCV, HCS, other natural ecosystems, peatland conservation areas and RTE species have been developed.  HCV program that implemented by unit of certification is more concern to monitor any threat activities near watercourse/riparian and wildlife animal monitoring.  Monitoring RTE's species conducted at determined HCV area in monthly basis using "Form Identifikasi Fauna di Kawasan Perkebunan Kelapa Sawit Seruyan	Complied



		Estate". Period January to February 2023 found monitoring lizard ( <i>Varanus salvator</i> ), Crested Serpent-eagle ( <i>Spilornis cheela</i> ), Cobra ( <i>Naja sp.</i> ), Long tailed macaque ( <i>Macaca fascicularis</i> ), Greater coucal ( <i>Centropus sinensis</i> ), common treeshew ( <i>Tupaia glis</i> ); no traps/snares put up within or nearby areas.	
7.12.8	<b>(C)</b> 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.	There is no land cleared since 15 November 2018 without prior HCV-HCS assessment. There is no new planting. Unit of certification has started planting in 1992, no new planting area/developing area since November 2005 and 2014/2018. Replanting has been performed since 2013 - 2015.	Not Applicable
		HCV assessment has been conducted by PT. Indotruba Tengah cooprated with independent Consultant Aksenta in August 2009. The HCV report documented in the "Laporan Identifikasi High Conservtion Value PT. Indotruba Tengah, Kabupaten Kotawaringin Barat & Seruyan Provinsi Kalimantan Tengah, January 2010". HCV Assessment was conducted using HCV Toolkit Indonesia 2008.	
		Based on communication with RSPO Secretariat dated 7 March 2022, BSI obtain statement" The unit has already been disclosed and RaCP is not applicable".	
		This indicator is Not Applicable.	



#### **Appendix B: GHG Reporting Executive Summary**

The GHG emissions that were produced in **2022** for **Sekunyir Palm Oil Mill** 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 Sekunyir Plam Oil Mill and supply base are as following:

Emission per product	roduct tCO₂e/tProduct	
СРО	1.04	
РКО	1.04	

Extraction	%
OER	24.06
KER	4.62

Production	t/yr
FFB Process	112,979.15
CPO Produced	27,180.139
PKO Produced	5,217.994

Land Use		На
OP Planted Area		6481.98
OP Planted on peat		0
Conservation (forested)		99.46
Conservation (non-forested)		0
	Total	6,581.44

#### **Summary of Field Emission and Sink**

	Own Crop*		Group		3 <sup>rd</sup> Party		Total	
	tCO <sub>2</sub> e	tCO₂e / FFB	tCO₂e	tCO₂e / FFB	tCO <sub>2</sub> e	tCO₂e / FFB	tCO₂e	tCO₂e / FFB
Emission								
Land Conversion	32,046.21	0.28	0.00	0.00	0.00	0.00	32,046.21	0.28
CO <sub>2</sub> Emission from fertilizer	6,290.67	0.06	0.00	0.00	0.00	0.00	6,290.67	0.06
NO <sub>2</sub> Emission	4,380.29	0.04	0.00	0.00	0.00	0.00	4,380.29	0.04
Fuel Consumption	1,138.48	0.01	0.00	0.00	0.00	0.00	1,138.48	0.01
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sink								
Crop Sequestration	-31,471.40	-0.28	0.00	0.00	0.00	0.00	-31,471.40	-0.28
Conservation Sequestration	-912.05	-0.01	0.00	0.00	0.00	0.00	-912.05	-0.01
Total	11,472.20	0.10	0.00	0.00	0.00	0.00	11,472.20	0.10

\*Note: Includes both estates and smallholders



#### **Summary of Mill Emission and Credit**

	tCO₂e	tCO₂e/tFFB
Emission		
POME	22,145.83	0.20
Fuel Consumption	84.52	0.00
Grid Electricity Utilization	0.00	0.00
Credit		
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
Total	22,230.34	0.20

#### **Summary of Kernel Crusher Emission and Credit (if applicable)**

Emissions	tCO <sub>2</sub> e			
PK from own mill	0.00			
PK from other source	0.00			
Fuel Consumptions	0.00			
Total Crusher emissions	0.00			

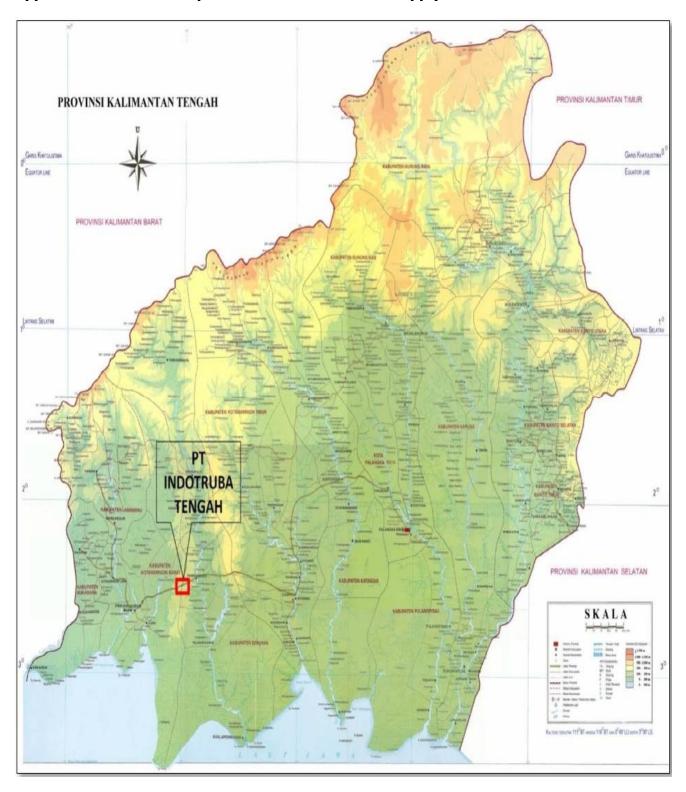
<sup>\*</sup>This mill has no kernel crusher operation.

Palm Oil Mill Effluent (POME) Treatment:				
Divert to Compost (%)	0.00			
Divert to anaerobic diversion (%)	100			

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

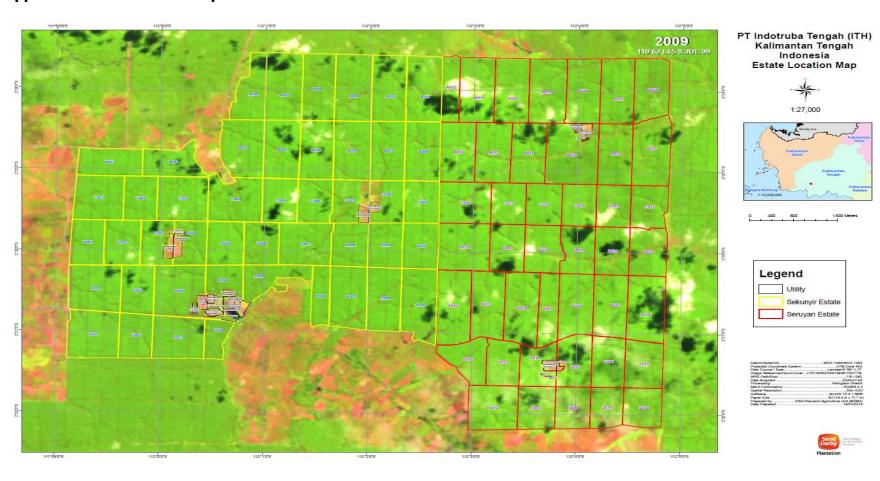


**Appendix C: Location Map of Certification Unit and Supply bases** 



## RSPO P&C Public Summary Report Revision 14 (Aug 2022)

#### **Appendix D: Estate Field Map**





#### Appendix E: List of Smallholder Registered and/or sampled

No	Name of farmer	Location	GPS Reference		Area Summary (Ha)		Forecasted annual FFB		Smallholder ID
			Latitude (N)	Longitude (E)	Total Certified Area	Planted Area	Production (MT)		
	N/A								
	Total								
Note: * are smallholders sampled in this audit.									



#### **Appendix F: List of Abbreviations**

a.i Active Ingredient

**BOD** Biochemical Oxygen Demand

**Certification Bodies** CB

Chemical Health Risk Assessment CHRA Chemical Oxygen Demand COD

Crude Palm Oil CPO

**CSPO** Certified Sustainable Palm Oil **CSPKO** Certified Sustainable Palm Kernel Oil

**Empty Fruit Bunch EFB** 

**EHS** Environmental, Health and Safety EIA **Environmental Impact Assessment Environmental Management System EMS** 

FFB Fresh Fruit Bunch

Free, Prior, Informed and Consent **FPIC** 

GAP Good Agricultural Practice

Greenhouse Gas GHG

**GMP** Good Manufacturing Practice Global Positioning System **GPS** High Conservation Value **HCV IPM Integrated Pest Management** 

**Identity Preserved** ΙP

IS - CSPO Independent Smallholder Certified Sustainable Palm Oil Independent Smallholder Certified Sustainable Palm Kernel Oil IS - CSPKO IS - CSPKE Independent Smallholder Certified Sustainable Palm Kernel Expeller

International Sustainable Carbon Certification ISCC

Independent Smallholder Standard ISS

Lethal Dose for 50 sample LD50

Mass Balance MB

Material Safety Data Sheet **MSDS** 

MT Metric Tonnes OER Oil Extraction Rate

Occupational Safety and Health OSH

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

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

Social & Environmental Impact Assessment SEIA

SIA Social Impact Assessment SOP Standard Operating Procedure