

**RSPO PRINCIPLE AND CRITERIA –
ANNUAL SURVEILLANCE ASSESSMENT 1.2
Public Summary Report**

| |
|--|
| Client Company name (Parent Company): PT Inti Indosawit Subur |
| Client company Address: <u>Jl. MH. Thamrin No. 31,</u> <u>Jakarta 10230</u> <u>Indonesia</u> |
| Certification Unit: PT Inti Indosawit Subur – Tungkal Ulu POM Location of Certification Unit: Merlung Village, Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia |

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Section 1: Scope of the Certification Assessment

| 1. Company Details | | | |
|---|--|---------------------------------|--|
| RSPO Membership Number | 1-0022-06-000-00 | Membership Approval Date | 6 February 2006 |
| Parent Company Name | PT Inti Indosawit Subur | | |
| Address | Head Office: Jl. MH. Thamrin No.31 Jakarta 10230, Indonesia | | |
| Subsidiary (Certification Unit Name) | PT Inti Indosawit Subur – Tungkal Ulu Palm Oil Mill | | |
| Address | Merlung Village, Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia | | |
| Contact Name | Mr. Ivan Novrizaldie | | |
| Website | www.asianagri.co.id | E-mail | ivan_novrizaldie@asianagri.com |
| Telephone | +62 21 230 1119 | Facsimile | +62 21 230 1120 |

| 2. Certification Information | | | |
|-------------------------------|--|------------------------------------|----------------|
| Certificate Number | RSPO 594422 | Date of First Certification | 15 August 2012 |
| | | Certificate Start Date | 15 August 2017 |
| | | Certificate Expiry Date | 14 August 2022 |
| Scope of Certification | Production of CPO and PK at Tungkal Ulu Palm Oil Mill with Tungkal Ulu Estate and Scheme Smallholder as supply base. The Palm Oil Mill capacity is 60 tons FFB/hour. | | |
| Applicable Standards | RSPO Principles and Criteria Indonesia National Interpretation September 2016; RSPO Certification System, June 2017; RSPO Supply Chain Certification Standard, June 2017; and RSPO Supply Chain Certification System, June 2017; | | |

| 3. Other Certifications | | | |
|----------------------------|--------------------|------------------------------|--------------------|
| Certificate Number | Standard(s) | Certificate Issued by | Expiry Date |
| ID05/65250 | ISO 14001:2004 | SGS | 10 June 2020 |
| EU-ISCC-Cert-DE100-6472016 | ISCC EU | SGS | 24 September 2019 |
| SGS-ID-ISPO-0032 | ISPO | SGS | 20 March 2024 |

| 4. Location(s) of Mill & Supply Bases | | | |
|--|---|------------------------|-------------------|
| Name (Mill / Supply Base) | Location [Map Reference #] | GPS Coordinates | |
| | | Latitude | Longitude |
| Tungkal Ulu Mill | Merlung Village, Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia. | 01° 18' 01.00" S | 102° 58' 53.00" E |
| Tungkal Ulu Estate | Merlung Village, Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia. | 01° 17' 18.00" S | 102° 56' 54.00" E |
| KUD Bina Usaha | Cinta Damai Village (SP-1), Renah Mendaluh District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia. | 01°20' 23.50" S | 102°55' 03.90" E |
| KUD Sawit Kita | Lampisi Village (SP-2), Renah Mendaluh District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia. | 01°19' 01.50" S | 102°56' 58.90" E |
| KUD Karya Kita | Tanjung Benanak Village (SP-3), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia. | 01°20' 40.10" S | 102°58' 16.30" E |
| KUD Karya Jaya | Bukit Harapan Village (SP-4), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia. | 01°20' 34.00" S | 102°00' 35.40" E |
| KUD Panca Mukti | Pinang Gading Village (SP-5), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia. | 01°19' 09.80" S | 103°04' 01.10" E |
| KUD Sari Bumi | Adipurwa Village (SP-6), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia. | 01°21' 50.40" S | 103°02' 39.30" E |
| Koperasi Manunggal Jaya | Adipurwa Village (SP-6), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia. | 01°21' 45.00" S | 103°01' 38.10" E |
| KUD Sawit Mulia | Intan Jaya Village (SP-7), Merlung District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia. | 01°20' 36.00" S | 103°05' 38.90" E |
| KUD Argo Makmur | Bukit Indah Village (SP-8), Muara Papalik District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia. | 01°19' 16.90" S | 103°07' 40.60" E |
| KUD Harapan Jaya | Kemang Manis Village (SP-9), Muara Papalik District, Tanjung Jabung Barat Regency, Jambi Province, Indonesia. | 01°19' 15.9" S | 103°10' 05.00" E |

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| 5. Description of Supply Base | | | | | |
|--------------------------------------|---|---------------------|--|----------------------------|-------------------------|
| Estate | Total Planted (Mature + Immature) (ha) | HCV (ha) | Infrastructure & Other (ha) | Total Area (ha) | % of Planted |
| Tungkal Ulu Estate | 4,356 | 128.32 | 71.68 | 4,556 | 95.61 |
| KUD Bina Usaha | 910 | - | - | 910 | 100.00 |
| KUD Sawit Kita | 1,028 | - | - | 1,028 | 100.00 |
| KUD Karya Kita | 1,168 | - | - | 1,168 | 100.00 |
| KUD Karya Jaya | 810 | - | - | 810 | 100.00 |
| KUD Panca Mukti | 792 | - | - | 792 | 100.00 |
| KUD Sari Bumi | 764 | - | - | 764 | 100.00 |
| Koperasi Manunggal Jaya | 208 | - | - | 208 | 100.00 |
| KUD Sawit Mulia | 1,362 | - | - | 1,362 | 100.00 |
| KUD Argo Makmur | 1,130 | - | - | 1,130 | 100.00 |
| KUD Harapan Jaya | 1,130 | - | - | 1,130 | 100.00 |
| Total | 13,658 | 128.32 | 71.68 | 13,858 | 98.56 |

| 6. Plantings & Cycle | | | | | | | |
|---------------------------------|--------------------|---------------|----------------|----------------|----------------|-----------------|-----------------|
| Estate | Age (Years) | | | | | Mature** | Immature |
| | 0 - 3 | 4 - 10 | 11 - 20 | 21 - 25 | 26 - 30 | | |
| Tungkal Ulu Estate | *) 1,510 | 7 | 43 | 1,437 | 1,359 | 2,846 | 1,510 |
| KUD Bina Usaha | - | - | - | 910 | - | 910 | - |
| KUD Sawit Kita | - | - | - | 840 | 188 | 1,028 | - |
| KUD Karya Kita | - | - | - | 552 | 616 | 1,168 | - |
| KUD Karya Jaya | - | - | - | 410 | 400 | 810 | - |
| KUD Panca Mukti | - | - | - | 792 | - | 792 | - |
| KUD Sari Bumi | - | - | - | 74 | 690 | 764 | - |
| Koperasi Manunggal Jaya | - | - | - | 208 | - | 208 | - |
| KUD Sawit Mulia | - | - | - | 1,362 | - | 1,362 | - |
| KUD Argo Makmur | - | - | - | 1,130 | - | 1,130 | - |
| KUD Harapan Jaya | - | - | - | 1,130 | - | 1,130 | - |
| Total (ha) | 1,510 | 7 | 43 | 8,845 | 3,253 | 12,148 | 1,510 |
| Note: | | | | | | | |

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*) = Replanting
 **) Only Mature area is considered as production area

| 7. Certified Tonnage of FFB (Own Certified Scope) | | | |
|--|-----------------------------------|---------------------------------|----------------------------------|
| Estate | Tonnage / year | | |
| | Estimated (July 2018 – June 2019) | Actual (July 2018 – April 2019) | Forecast (July 2019 – June 2020) |
| Tungkal Ulu Estate | 70,779 | 66,284.90 | 54,698 |
| Tungkal Ulu Scheme Smallholder | 95,757 | 83,284.55 | 93,022 |
| Total | 166,536 | 149,569.45 | 147,720 |

| 8. Certified Tonnage of FFB (from other certified unit(s)) if applicable * | | | |
|---|-----------------------------------|---------------------------------|----------------------------------|
| Estate | Tonnage / year | | |
| | Estimated (July 2018 – June 2019) | Actual (July 2018 – April 2019) | Forecast (May 2019 – April 2020) |
| N/A | N/A | N/A | N/A |
| Total | | | |

| 9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable | | | |
|---|-----------------------------------|---------------------------------|----------------------------------|
| Independent FFB Supplier | Tonnage / year | | |
| | Estimated (July 2018 – June 2019) | Actual (July 2018 – April 2019) | Forecast (July 2019 – June 2020) |
| Third Party FFB Suppliers | 146,670 | 102,202 | 147,871 |
| Total | 146,670 | 102,202 | 147,871 |

| 10. Certified Tonnage | | | |
|------------------------------|-----------------------------------|---------------------------------|----------------------------------|
| Mill Capacity: 60 MT/hr | Estimated (July 2018 – June 2019) | Actual (July 2018 – April 2019) | Forecast (July 2019 – June 2020) |
| | FFB | FFB | FFB |
| SCC Model: | 166,536 | 149,569.45 | 147,720 |

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| | | | |
|-----------|--------------------------|--------------------------|--------------------------|
| MB | CPO (OER: 22.74%) | CPO (OER: 21.16%) | CPO (OER: 22.38%) |
| | 37,877 | 31,646.45 | 33,060 |
| | PK (KER: 5.35%) | PK (KER: 5.33%) | PK (KER: 5.60%) |
| | 8,910 | 7,977.58 | 8,272 |

Note:

| 11. Actual Sold Volume (CPO) | | | | | |
|-------------------------------------|-----------------------|--------------------------------|------------|---------------------|--------------|
| | RSPO Certified | Other Schemes Certified | | Conventional | Total |
| | | ISCC | RSB | | |
| CPO (MT) | 4,236.51 | 26,725.18 | 0 | 0 | 30,961.69 |

| 12. Actual Sold Volume (PK) | | | | | |
|------------------------------------|-----------------------|--------------------------------|------------|---------------------|--------------|
| | RSPO Certified | Other Schemes Certified | | Conventional | Total |
| | | ISCC | RSB | | |
| PK (MT) | 7,303.16 | 0 | 0 | 0 | 7,303.16 |

| 13. Actual Group certification Claims | | |
|--|---------------|-----------------------------|
| | Credit | Physical Volume (MT) |
| IS-CSP0 | 0 | 0 |
| IS-CSPKO | 0 | 0 |
| IS-CSPKE | 0 | 0 |

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn Bhd,
(ASI Accreditation Number: ASI-ACC-067)
Unit 3, Level 10, Tower A
The Vertical Business Suites, Bangsar South
No. 8, Jalan Kerinchi
59200 Kuala Lumpur
Tel +603 2242 4211 Fax +603 2242 4218
Nicholas Cheong: Nicholas.Cheong@bsigroup.com
www.bsigroup.com

BSI is a leading global provider of management systems assessment and certification, with more than 80,000 certified locations and clients in over 180 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (ASI-ACC-067) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia and an office at Jakarta and Australia which involve in RSPO Certification Program.

2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted from 20 to 24 May 2019. The audit programme is included as Appendix D. The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. Mill was audited together with the sample estates. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas and local communities.

The Major NC close out on-site assessment was conducted on 7 August 2019. The audit programmes are included in Section 2.3.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. RSPO Principles and Criteria Indonesia National Interpretation September 2016 and RSPO Supply Chain Certification Standard 2017 were used to guide the collection of information to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

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

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

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

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Section 3.5.

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

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

For 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 (Certification) | Year 2 (ASA 1) | Year 3 (ASA 2) | Year 4 (ASA 4) | Year 5 (ASA 5) |
| Tungkal Ulu Palm Oil Mill | √ | √ | √ | √ | √ |
| Tungkal Ulu Estate | √ | √ | √ | √ | √ |
| KUD Bina Usaha | √ | | √ | | |
| KUD Sawit Kita | | √ | | √ | |
| KUD Karya Kita | | √ | | | √ |
| KUD Karya Jaya | √ | | | √ | |
| KUD Panca Mukti | | √ | | | √ |
| KUD Sari Bumi | | √ | | √ | |
| Koperasi Manunggal Jaya | | | √ | | |
| KUD Sawit Mulia | √ | | | √ | |
| KUD Argo Makmur | | | √ | | √ |
| KUD Harapan Jaya | | | √ | | √ |

Tentative Date of Next Visit: June 1, 2020 - June 5, 2020

Total No. of Mandays: 29

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2.2 BSI Assessment Team:

| Team Member Name | Role <i>(Team Leader or Team member)</i> | Qualifications <i>(Short description of the team members)</i> |
|---------------------------|--|--|
| Eko Purwanto (EP) | Team Leader | Best management practice in palm oil mill and estate, Occupational Health and Safety Management System, Environmental Management System, HCV; (fluent in English and Bahasa Indonesia) |
| Pratama A. Sedayu (PS) | Team Member | RSPO SCCS for CPO Mill, Environmental aspect-impacts, Occupational Health and Safety, internal stakeholder consultation; (fluent in English and Bahasa Indonesia). |
| Imam Fakhrurozi (IF) | Team Member | Legal aspect, External and Internal Stakeholder Consultation, Social Aspect, Environmental aspect-impacts, Occupational Health and Safety; (fluent in English and Bahasa Indonesia). |
| Yudwi Wisnu Rahmanro (YR) | Team Member | Legal, Environmental aspect-impacts, Occupational Health and Safety, internal stakeholder consultation; (fluent in English and Bahasa Indonesia). |
| Mujinus Jalaraya (MJ) | Team Member | Conservation, Environmental aspect-impacts, Occupational Health and Safety, internal stakeholder consultation; (fluent in English and Bahasa Indonesia). |
| Edy Widodo (EW) | Team Member | Environmental aspect-impacts, Occupational Health and Safety, Social Aspect, internal stakeholder consultation; (fluent in English and Bahasa Indonesia). |

Accompanying Persons: Nil

2.3 Assessment Plan

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

| Date | Time | Subjects | EP | PS | IF | YR | MJ | EW |
|--------------------|-------------|--|---------|--------------------|--------------|------------------|------------------|------------------|
| | | | PRSPOLA | PRSPO-EMS/PRSPO-SC | PRSPO-OHS/SA | PRSPO-EMS,OHS,SA | PRSPO-EMS,OHS,SA | PRSPO-EMS,OHS,SA |
| Monday, 20/05/2019 | 05.45-07.15 | Flight Jakarta – Jambi <i>(by Garuda GA 130)</i> | √ | √ | √ | √ | √ | √ |
| | 08.00-12.00 | Travelling Jambi to PT IIS – Tungkal Ulu | √ | √ | √ | √ | √ | √ |
| | 12.00-13.00 | Break | √ | √ | √ | √ | √ | √ |
| | 13.00-14.00 | Opening Meeting - Presentation by client (Overview of PT Inti Indosawit Subur – Tungkal Ulu Palm Oil Mill and its supply base); - Presentation by BSI team (Objective, scope, audit plan, etc.) | √ | √ | √ | √ | √ | √ |

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| Date | Time | Subjects | EP | PS | IF | YR | MJ | EW |
|------------------------|-------------|---|------------|------------------------------|------------------|-----------------------------|-----------------------------|-----------------------------|
| | | | PRSP LA | PRSP- EMS/ PRSP- SC | PRSP- OHS/ SA | PRSP- EMS, OHS, SA | PRSP- EMS, OHS, SA | PRSP- EMS, OHS, SA |
| | 14.00-17.00 | Document Review in Tungkal Ulu POM and Estate: <ul style="list-style-type: none"> • Verification of Basic Information (Mill and supply bases) • General information, Time bound plan, partial certification verification • Best management practices Mill and Estate, OHS, EMS, Social and Labour, RSPO Supply Chain, Continual improvement, etc. • Review of previous assessment findings. | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| Tuesday, 21/05/2019 | 08.00-12.00 | Interview with Stakeholders (statutory bodies): <ul style="list-style-type: none"> • Environmental Agency of Tanjung Jabung Barat Regency • Labour Agency (Disnakertrans) of Tanjung Jabung Barat Regency • National Land Agency (Kantor Pertanahan) of Tanjung Jabung Barat Regency • Plantation Agency (Disbun) of Tanjung Jabung Barat Regency • NGO | | | ✓ | | | |
| | | Document Review and Field observation to Tungkal Ulu Estate: <ul style="list-style-type: none"> • Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) • Implementation of Environmental, Conservation and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management, HCV Area) • Implementation of Occupational Health & Safety Aspect • Implementation of Legal Aspect (Land Ownership, Legal Boundaries, Land Occupied) • Observation of Workers Facilities (Housing complex, School, Worship Place, etc.). | ✓ | ✓ | | ✓ | ✓ | |
| | 12.00-14.00 | Break | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| | 14.00-17.00 | Document Review and Field observation to Tungkal Ulu POM: <ul style="list-style-type: none"> • Implementation of Mill Processing Aspect (FFB Receiving, FFB Sorting, Processing Activity) • RSPO Supply Chain verification (Weighbridge, Dispatch CPO & PK, Data Record) • Occupational Health & Safety Aspect (Inspection to Chemical Storage, Hazardous Waste Storage, Fire Control Simulation, Processing Activities) • Implementation of Environmental and Waste Management Aspect (POME Pond, Empty Bunch Area, Reservoir/Intake Point, Biogas Plant – <i>if any</i>) • Consultation with internal stakeholders (labor union and gender committee) and local contractor for Mill and Estate. | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |

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| Date | Time | Subjects | EP | PS | IF | YR | MJ | EW |
|-----------------------|-------------|---|---------|--------------------|---------------|--------------------|--------------------|--------------------|
| | | | PRSPOLA | PRSPO-EMS/PRSPO-SC | PRSPO-OHS/ SA | PRSPO-EMS, OHS, SA | PRSPO-EMS, OHS, SA | PRSPO-EMS, OHS, SA |
| Wednesday, 22/05/2019 | 08.00-10.00 | Field observation to KUD Bina Usaha (Scheme Smallholders) : <ul style="list-style-type: none"> Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) Implementation of Environmental, Conservation and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management, HCV Area) Implementation of Occupational Health & Safety Aspect Implementation of Legal Aspect (Land Ownership, Legal Boundaries) Consultation with internal stakeholders (village head, cooperative management), local contractor and local NGO's (if any) | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| | | Sample taken: 20 smallholders plot | | | | | | |
| | | Document Review Tungkal Ulu Scheme Smallholder: KUD Bina Usaha | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| | 12.00-14.00 | Break | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| | 14.00-17.00 | Field observation to KUD Manunggal Jaya (Scheme Smallholders) : <ul style="list-style-type: none"> Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) Implementation of Environmental, Conservation and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management, HCV Area) Implementation of Occupational Health & Safety Aspect Implementation of Legal Aspect (Land Ownership, Legal Boundaries) Consultation with internal stakeholders (village head, cooperative management), local contractor and local NGO's (if any) | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| | | Sample taken: 18 smallholders plot | | | | | | |
| | | Document Review Tungkal Ulu Scheme Smallholder: KUD Manunggal Jaya | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| Thursday, 23/05/2019 | 08.00-12.00 | Field observation to KUD Argo Makmur (Scheme Smallholders) : <ul style="list-style-type: none"> Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) Implementation of Environmental, Conservation and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management, HCV Area) Implementation of Occupational Health & Safety Aspect Implementation of Legal Aspect (Land Ownership, Legal Boundaries) Consultation with internal stakeholders (village head, cooperative management), local contractor and local NGO's (if any) | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| | | Sample taken: 20 smallholders plot | | | | | | |

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| Date | Time | Subjects | EP | PS | IF | YR | MJ | EW |
|--------------------|-------------|---|---------|--------------------|--------------|------------------|------------------|------------------|
| | | | PRSPOLA | PRSPO-EMS/PRSPO-SC | PRSPO-OHS/SA | PRSPO-EMS,OHS,SA | PRSPO-EMS,OHS,SA | PRSPO-EMS,OHS,SA |
| | | Document Review Tungkal Ulu Scheme Smallholder: KUD Argo Makmur | √ | √ | √ | √ | √ | √ |
| | 12.00-14.00 | Break | √ | √ | √ | √ | √ | √ |
| | 14.00-17.00 | Field observation to KUD Harapan Jaya (Scheme Smallholders) : <ul style="list-style-type: none"> Implementation of Agronomy Aspect (Harvesting & Transportation, Manuring, Pesticides Application, Road Maintenance, Biological Control Monitoring, EFB Application) Implementation of Environmental, Conservation and Waste Management Aspect (Inspection to Chemical Storage, Fertilizer Storage, Hazardous Waste Storage, Fire Control Facilities, Waste Management, HCV Area) Implementation of Occupational Health & Safety Aspect Implementation of Legal Aspect (Land Ownership, Legal Boundaries) Consultation with internal stakeholders (village head, cooperative management), local contractor and local NGO's (if any) | √ | √ | √ | √ | √ | √ |
| | | Sample taken: 18 smallholders plot | | | | | | |
| | | Document Review Tungkal Ulu Scheme Smallholder: KUD Harapan Jaya | √ | √ | √ | √ | √ | √ |
| Friday, 24/05/2019 | 08.00-12.00 | Document review RSPO P&C for: Tungkal Ulu POM, Estate and Scheme Smallholder | √ | √ | √ | √ | √ | √ |
| | 12.00-14.00 | Break | √ | √ | √ | √ | √ | √ |
| | 14.00-15.00 | Continue Document review RSPO P&C for: Tungkal Ulu POM, Estate and Scheme Smallholder | √ | √ | √ | √ | √ | √ |
| | 15.00-16.00 | Report Preparation and Auditor Discussion | √ | √ | √ | √ | √ | √ |
| | 16.00-17.00 | Closing Meeting | √ | √ | √ | √ | √ | √ |

Section 3: Assessment Findings

3.1 Normative requirement applied for this assessment:

- PT Inti Indosawit Subur Multiple Management Units / Time Bound Plan
- RSPO Supply Chain Certification Standard 2017
- RSPO P&C INA-NIWG 2016

3.2 Time Bound Plan progress for multiple management units

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

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| Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised | No | Comply |
| Have there been any stakeholder comments? | No | Comply |
| Un-Certified Units or Holdings | | |
| No replacement after dates defined in NIs Criterion 7.3: <ul style="list-style-type: none"> • Primary forest. • Any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.3. | Based on Time Bound Plan revised 1 January 2019, PT Mitra Unggul Pusaka – Segati Mill located in Pelalawan, Riau Province postponed to Re-Audit in year 2020. Status of RaCP and relevant issues are still in progress and waiting for RSPO feedback. | Comply |
| Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure. | Based on Time Bound Plan revised 1 January 2019, PT Mitra Unggul Pusaka – Segati Mill located in Pelalawan, Riau Province postponed to Re-Audit in year 2020. Status of RaCP and relevant issues are still in progress and waiting for RSPO feedback. | Comply |
| Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 2.2, 6.4, 7.5 and 7.6. The RSPO RaCP tracker shall be checked to confirm for any land conflicts/Liabilities https://www.rspo.org/certification/remediation-and-compensation/racp-tracker . The progress on the Liabilities shall be verified and reported. | Based on Time Bound Plan revised 1 January 2019, PT Mitra Unggul Pusaka – Segati Mill located in Pelalawan, Riau Province postponed to Re-Audit in year 2020. New planting was performed through conversion from rubber plantation. The company has prepared NPP submission to RSPO. NPP for conversion area is still in progress including supporting document (conversion permit, HCV assessment). LUC supporting data for PT Mitra Unggul Pusaka has been sent by the company to RSPO on 2 April 2019 including HGU 1: Gondai Estate and Penarikan Estate (Integrated Report for both estate, for Annex 3a has use the new template); HGU 2: Segati Estate (Integrated Report and Annex 3a). Communication has been done between the company and Status of RaCP and relevant issues are still in progress and waiting for RSPO feedback. | Comply |
| Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3. | No Labor disputes | Comply |
| Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1 | No Legal non-compliance | Comply |
| Did the company conduct internal audit against the uncertified management units requirement? | Yes, Internal Audit has been done on 25-26 March 2019. Possitive assurance statement: | Comply |

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| If yes, a positive assurance statement shall be available. | <ul style="list-style-type: none"> - PT MUP already conduct ISPO Certification following Indonesia Mandatory Regulation and get certified since 2016. - PT MUP also already get ISCC Certificate since 2013 - Current progress for RSPO, PT MUP still complete RaCP requirement and will conduct re-audit, target at 2020. | |
|--|---|--|

3.3 Progress of scheme smallholders and/or outgrowers

| Progress of scheme smallholders or outgrowers towards compliance with relevant standards | | |
|--|--|-------------------|
| Requirement | Remarks | Compliance |
| Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill’s initial certification? OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years. | All scheme smallholders associated to PT Inti Indosawit Subur – Tungkal Ulu Palm Oil Mill have been comply with the standard | Comply |

3.4 Details of findings

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

During the ASA 1.2 there were six (6) Major & three (3) Minor nonconformities raised. PT Inti Indosawit Subur – Tungkal Ulu POM submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment. The implementation of the Corrective Actions for the Major Nonconformity(ies) has been verified for it effectiveness and closed accordingly.

| Summary of Total Number of Nonconformity | | | |
|---|--------------------------|--|--|
| Nonconformity | | | |
| NCR Ref # | 1761451-201905-M1 | Clause & Category (Major / Minor) | RSPO P&C INA-NI, September 2016; Indicator 1.2.1 |
| Date Issued | 24 May 2019 | Due Date | 21 August 2019 |
| Closed (Yes / No) | Yes | Date of nonconformity Closure | 7 August 2019 |

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| <p>Statement of Nonconformity:</p> | <p>The document related to details of complaints and grievances (Criterion 6.3) and continual improvement plans (Criterion 8.1) has not provided in the list of documents that are publicly accessible, which recorded in "Formulir Distribusi Informasi" (Open to Public) updated on 5 July 2018 for PT Inti Indosawit Subur – Tungkal Ulu and January 2019 for Scheme Smallholders.</p> |
| <p>Requirement Reference:</p> | <p>Publicly available documents shall include, but are not necessarily limited to:</p> <ul style="list-style-type: none"> a) Land titles/user rights (Criterion 2.2) b) Occupational health and safety plans (Criterion 4.7) c) Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8) d) HCV documentation (Criteria 5.2 and 7.3) e) Pollution prevention and reduction plans (Criterion 5.6) f) Details of complaints and grievances (Criterion 6.3) g) Negotiation procedures (Criterion 6.4) h) Continual improvement plans (Criterion 8.1) i) Public summary of certification assessment report j) Human Rights Policy (Criterion 6.13). |
| <p>Objective Evidence:</p> | <p>The organization has made a list of documents that are publicly accessible, recorded in "Formulir Distribusi Informasi" (Open to Public) updated on 5 July 2018 for PT Inti Indosawit Subur – Tungkal Ulu and January 2019 for Scheme Smallholders.</p> <p>However, the document related to Details of complaints and grievances (Criterion 6.3) and Continual improvement plans (Criterion 8.1) has not provided at the list of documents</p> |
| <p>Corrections:</p> | <p>Management PT IIS – Tungkal Ulu has made revision of "Daftar Dokumen dan Informasi Untuk Diakses Publik PT Inti Indosawit Subur" dated 15 July 2019. List of document publicly available (government, NGO, society/community, KUD) among others:</p> <ul style="list-style-type: none"> • Land titles/user rights (HGU, Izin lokasi, Izin prinsip, IPKH) • Occupational health and safety plans (Laporan Pelaksanaan P2K3 dan program K3) • Plans and impact assessments relating to environmental and social impacts (AMDAL and SIA) • HCV documentation (Laporan identifikasi HCV) • Pollution prevention and reduction plans (Program Manajemen Lingkungan) • Details of complaints and grievances (Detail Logbook Keluhan Karyawan dan Pelanggan) • Negotiation procedures (SOP Penanganan Informasi Keluhan, Konflik lahan dll) • Continual improvement plans (Continous Improvement Program) • Public summary of certification assessment report (Public Summary Report RSPO) • Human Rights Policy (Kebijakan Perusahaan) <p>Sustainability team has deliver the training and awareness to management site on 3 August 2019 regarding minimum requirement of document publicly available according to RSPO P & C indicator 1.2.1. Training record were available and can be demonstrated during verification audit.</p> |

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| Root Cause Analysis: | Humas (Public relation) as a PIC whose made a list of documents that are publicly accessible by stakeholder has not aware the minimum requirement of P & C RSPO indicator 1.2.1; Humas determined the list of document publicly available based on social needs and impact. | | |
| Corrective Actions: | Monitoring the compliance of RSPO P & C requirement through internal audit. Internal audit program has been made for 2019 with frequency 2 times a year. In 2019 internal audit performed on May 2019 and August 2019. | | |
| Assessment Conclusion: | List of document that are publicly accessible are available during verification audit and 2 nd internal audit of 2019 in PT Inti Indosawit Sbur – Tungkal Ulu has been done in August 2019. The corrective action made is sufficient and accepted. This Major NC is closed on 7 August 2019. | | |
| Nonconformity | | | |
| NCR Ref # | 1761451-201905-M2 | Clause & Category (Major / Minor) | RSPO P&C INA-NI, September 2016; Indicator 5.1.3 |
| Date Issued | 24 May 2019 | Due Date | 21 August 2019 |
| Closed (Yes / No) | Yes | Date of nonconformity Closure | 7 August 2019 |
| Statement of Nonconformity: | Environmental monitoring was not implemented as per RPL (Rencana Pemantauan Lingkungan) document. | | |
| Requirement Reference: | Environment monitoring plan document, its implementation report, and the corrective plan (if non-conformance arised from the monitoring result) shall be available. This plan is reviewed on two yearly basis. | | |
| Objective Evidence: | <p>PT Inti Indosawit Subur - Tungkal Ulu has Environmental monitoring plan document presented in RPL (Rencana Pemantuan Lingkungan) Document and has been approved through "Keputusan Bupati Tanjung Jabung Barat Nomor 309 Tahun 2009 tentang Persetujuan Analisis Dampak Lingkungan, Rencana Pengelolaan Lingkungan dan Rencana Pemantauan Lingkungan Kegiatan PMKS PT Inti Indosawit Subur di Kecamatan Merlung Kab. Tanjung Jabung Barat" dated 6 July 2009.</p> <p>As per environment monitoring plan stated that company shall be perform soil analysis twice a year, however soil analysis performed once a year.</p> <p>There is no evidence that Soil Analysis conducted twice a year as environment management and monitoring plan directive (matriks RKL-RPL). There is no justification if monitoring plan amended and informed officially.</p> <p>Soil Quality Analysis Report from BINALAB, No: 104-2/BINA/V/2018, dated 23 April 2018. Soil analysis for year 2018 conducted once a year, therefore it is not comply as required by environment management plan (RPL).</p> | | |
| Corrections: | <ul style="list-style-type: none"> Take the soil sample and analyze in the laboratorium accordingly for period semester II; PT IIS Tungkal Ulu has take the soil sample in area of plantation Tungkal Ulu Estate to be analyze including soil sample in depth of 0 – 20 cm, 20 – 40 cm, 40 – 60 cm, 60 – 80 cm, 80 – 100 cm dan 100 – 120 cm in area disturbing and undisturbing (control). Soil sampling analysis to monitor the soil fertility covering parameter: Liat, Debu, Pasir, C-Organik, N-Total, C/N, Cd, Cu, and other soil micro, porositas and permaebility. Soil analysis conducted on 18 Mey 2019 by "Laboratorium Pengukuran dan Kualitas Lingkungan "Pro- | | |

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| | <p>Enviro". Soil analysis can be demonstrated and presented in document "Hasil analisis Pengujian Tanah No. 118-2/KT1/ENVIRO/VI/2019".</p> <ul style="list-style-type: none"> Appointing PIC who responsible for soil analysis sampling and deliver the sample to the laboratorium to be analyze. PT IIS Tungkal Ulu has issued the Memorandum No. 160/SM-KTU/Memo/VII/2019, July 2019 concerning assignment PIC for Soil analysis monitoring. Memorandum stated and appointed Arda Siahaan (Mandor LA) as a PIC to take the soil sample and deliver to the laboratorium to be analyze. | | |
| Root Cause Analysis: | <p>Tungkal Ulu management refer to regulation KepmenLH No. 29/2003 "<i>tentang pedoman, syarat dan tatacara perizinan pemanfaatan air limbah industri minyak sawit pada tanah diperkebunan kelapa sawit</i>" (guidelines, conditions and procedures for licensing the utilization of liquid waste from palm oil industry on land in oil palm plantations) which required soil analysis performed once a year while in matrik RPL stated that soil analysis shall be performed twice a year.</p> | | |
| Corrective Actions: | <ul style="list-style-type: none"> Training refreshment regarding RKL – RPL matriks implementation. PT IIS Tungkal Ulu has made the training program 2019 including refreshment training RKL – RPL matriks implementation. Training has been carried out on July 2019 by Muhamad Syahrial (Environment and Sustainability Officer). Training program will continue and performed once a year. Monitoring and evaluation the implementation of RKL- RPL matriks each semester. PT IIS Tungkal Ulu has reported the implementation RKL – RPL semester I 2019 to BLH Tanjung Jabung Barat Regency. | | |
| Assessment Conclusion: | <p>Result of soil sample were available during verification audit as well as Appointment letter for PIC who responsible for soil sample taking and deliver to the laboratory, as stated in Memorandum No. 160/SM-KTU/Memo/VII/2019, July 2019. During verification audit, auditor has also verified PT IIS – Tungkal Ulu POM's record of refreshment training regarding RKL-RPL (environmental management plan) implementation matrix a well as the training program. The corrective actions made are sufficient and accepted. This Major NC is closed on 7 August 2019.</p> | | |
| Nonconformity | | | |
| NCR Ref # | 1761451-201905-M3 | Clause & Category (Major / Minor) | RSPO SCCS, June 2017 - General Chain of Custody Requirement- Clause 5.3.2 |
| Date Issued | 24 May 2019 | Due Date | 21 August 2019 |
| Closed (Yes / No) | Yes | Date of nonconformity Closure | 7 August 2019 |
| Statement of Nonconformity: | <p>Internal audit RSPO SCCS in PT. Inti Indosawit Subur – Tungkal Ulu POM was not effectively carried out.</p> | | |
| Requirement Reference: | <p>The site shall have a written procedure to conduct annual internal audit to determine whether the organization;</p> <p>i) conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>ii) effectively implements and maintains the standard requirements within its organization.</p> | | |
| Objective Evidence: | <p>1. Internal audit RSPO SCCS for year 2018 only carried out once, while SOP clearly request for twice per year;</p> | | |

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| | <p>2. The internal audit process – as reported in the checklist, implies that the requirements related to RSPO SCCS General Requirement for Chain of Custody 5.5 Outsourcing – deemed not applicable. It is evident PT. Inti Indosawit Subur - Tungkal Ulu POM is using third-party transporter;</p> <p>3. The internal audit process – as reported for RSPO SCCS clause 5.6.1, 5.7.1, 5.9.3 using records related to CPKO production.</p> | | |
| Corrections: | <p>Coordination with manager internal audit sustainability to made the audit program for RSPO SCC twice a year as per procedure. PT IIS Tungkal Ulu has made the audit programe for sustainability in "Rencana dan Realisasi Interlal Audit Pre and Post 2019", In the schedule Internal audit RSPO SCCS 2019 scheduled in May and August 2019. First internal audit RSPO SCCS for Tungkal Ulu POM has been conducted on 29 May 2019 and the second internal audit scheduled on August 2019. Internal audit on May 2019, there were 1 non conformities raised and Tungkal Ulu POM has taken action by correction and corrective action and the NC has been Closed. Evidence of Non conformity closing can be demonstrated. Internal audit report can be demonstrated and following the standard RSPO SCCS 2017.</p> | | |
| Root Cause Analysis: | <p>Internal audit RSPO SCCS was conducted integrated with other system (RSPO P & C, SMK3) which conducted once a year by internal auditor and not refer to Procedure "SOP Traceability AA-MPM-OP-1400.17-R6 dated 1 September 2017" that require twice a year.</p> | | |
| Corrective Actions: | <p>Maintain the schedule of internal audit RSPO SCCS twice a year and regularly review the internal audit report.</p> | | |
| Assessment Conclusion: | <p>Auditor verified RSPO SCCS Internal Audit Program under PT Inti Indosawit Subur membership. RSPO SCCS Internal Auidt of PT IIS – Tungkal Ulu planned twice in 2019. Internal audit result of 2nd Semester 2019 that coducted 23 July 2019 has been demonstrated during verification audit. Internal audit result shows that RSPO SCCS General Requirement for Chain of Custody 5.5 Outsourcing has been audited. The document also shows that records related to CPO production and deliveries have been audited against RSPO SCCS clause 5.6.1, 5.7.1 and 5.9.3. The corrective action made is sufficient and accepted. This Major NC is closed on 7 August 2019.</p> | | |
| Nonconformity | | | |
| NCR Ref # | 1761451-201905-M4 | Clause & Category (Major / Minor) | RSPO SCCS, June 2017 - General Chain of Custody Requirement- Clause 5.5.2 |
| Date Issued | 24 May 2019 | Due Date | 21 August 2019 |
| Closed (Yes / No) | Yes | Date of nonconformity Closure | 7 August 2019 |
| Statement of Nonconformity: | <p>PT. Inti Indosawit Subur cannot demonstrate there is control over outsourced transporter</p> | | |
| Requirement Reference: | <p>Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following:</p> <p>b. The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary.</p> | | |

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| | <p>c. The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> |
| Objective Evidence: | <p>PT. Inti Indosawit Subur cannot demonstrate there is control upon outsourcing transporter:</p> <p>b. PT. Inti Indosawit Subur cannot demonstrate an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c. PT. Inti Indosawit Subur cannot demonstrate control system and communicated the outsourced transport contractor.</p> |
| Corrections: | <ul style="list-style-type: none"> • PT IIS Tungkal Ulu has made the new contract agreement with transporter "PT Mitra Abadi Damai" dated 2 August 2019. The contract agreement has covered: <ul style="list-style-type: none"> ✓ Outsourced process with transporter including right and responsibility between two parties, ✓ Transporter is committed to comply with RSPO SCCS standard and following the regulation ✓ Transporter is willing to be audited by Certification Body as necessary concerning on RSPO SCCS. <p>The contract agreement has been signed by two parties both PT IIS – Tungkal Ulu POM (on behalf PT Inti Indosawit Subur Group) and PT Mitra Damai Abadi.</p> • PT IIS Tungkal Ulu has a procedure to control the outsourced transporter through "SOP Traceability AA-MPM-OP-1400.17-R6 dated 1 September 2017" Internal control for CPO and PK delivery by contractor has made as well by: <ul style="list-style-type: none"> ✓ Surat Izin Muat CPO dan Kernel, contain information of Driver name, Identity number, Car/Truck Number, CPO/PK Dispatch time, netto, incoming and outgoing time\ ✓ Delivery Order Slip from Transporter, contain information of sales contract number, Truck number, destination, driver name, port destination. ✓ Daftar Periksa Kesiapan Pengiriman CPO/Kernel contain information of Truck number, driver name, date of inspection, item inspection including: driver identity and completeness of vehicle legality, completeness of physical standard of vehicle, number of seal. ✓ Recapitulation of CPO and PK incoming from PT Sari Dumai Sejati, contain information of CPO/PK incoming date to PT SDS, Vehicle Number, origin of CPO and PK, Volume of CPO and PK deliver by Tungkal Ulu POM and receive by PT SDS, variant of volume, percentage of variant, quality of CPO and PK (FFA and moisture) deliver by Tungkal Ulu POM and receive by PT SDS (Bulking station). In addition, PT Sari Dumai Sejati has implementing the certification of RSPO SCCS and has been certified by Control Union with RSPO Certificate Number CU-RSPO SCC-821960 valid until 29/08/2022. It is indicated that PT SDS has internal control to ensure and monitor the compliance of CPO/PK delivery by transporter. |
| Root Cause Analysis: | <p>PT IIS Tungkal Ulu POM deemed that "Surat Perintah Kerja (SPK)" for transporter is the contract, however SPK is not covering the agreement between two parties and not signed by transporter and only by PT IIS – Tungkal Ulu.</p> |
| Corrective Actions: | <p>Conduct the internal audit regularly and include the transporter/outsourced process in the internal audit checklist.</p> |

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| Assessment Conclusion: | Contract Agreement between PT IIS – Tungkal Ulu and PT Mitra Abadi Damai as transporter can be demonstrated during audit as well as record of dissemination of procedure to control outsourced transporter that documented in SOP Traceability AA-MPM-OP-1400.17-R6 to the relevant transporter. The corrective actions made are sufficient and accepted. This Major NC is closed on 7 August 2019. | | |
| Nonconformity | | | |
| NCR Ref # | 1761451-201905-M5 | Clause & Category (Major / Minor) | RSPO SCCS, June 2017 - General Chain of Custody Requirement- Clause 5.6.1 |
| Date Issued | 24 May 2019 | Due Date | 21 August 2019 |
| Closed (Yes / No) | Yes | Date of nonconformity Closure | 7 August 2019 |
| Statement of Nonconformity: | PT. Inti Indosawit Subur – Tungkal Ulu POM cannot demonstrate maintain accurate RSPO certificate number of the sellers in the dispatch slipnote for delivery of CSPO to customer, using RSPO 564422 code instead of RSPO 594422. | | |
| Requirement Reference: | <p>The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form.</p> <ul style="list-style-type: none"> • The name and address of the buyer; • The name and address of the seller; • The loading or shipment/ delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • Supply chain certificate number of the seller; • A unique identification number. | | |
| Objective Evidence: | <p>Incorrect RSPO Certificate number of the seller identified in contract - delivery order - dispatch note:</p> <p>Contract: "Kontrak Penjualan No.03003/CB-10/02/19 antara PT. Inti Indosawit Subur dan PT. Sari Dumai Sejati" dated 1 March 2019 for sales of 487,860 kg commodity Miyak Kelapa Sawit RSPO; Supply Chain Model Mass Balance; Certificate RSPO 564422.</p> <p>Delivery Order: Delivery Order PT. Inti Indosawit Subur No.03003/DB10/02/19 dated 1 March 2019, instruction to PT. Inti Indosawit Subur - Manager Tangki Timbun Rengat to deliver 487,860 kg commodity Minyak Kelapa Sawit RSPO; Supply Chain Model Mass Balance; No.Ref.RSPO 564422.</p> <p>Dispatch slipnote: - Dispatch slipnote Tungkal Ulu POM No.PTUC118202500 dated 1 December 2018. Destination PT. Inti Indosawit Subur-Teluk Bagus, Rengat. Commodity CPO Certified RSPO. Supply Chain Model Mass Balance. RSPO Certificate No.RSPO594422. DO No.11329/DB10/02/18. Transporter PT. Sumber Kencana Inhu, No. SK.01/SKI/12/10; Vehicle No.BM8884BU. Volume dispatched 22.920 MT. Batch No.RSPO564422.</p> | | |

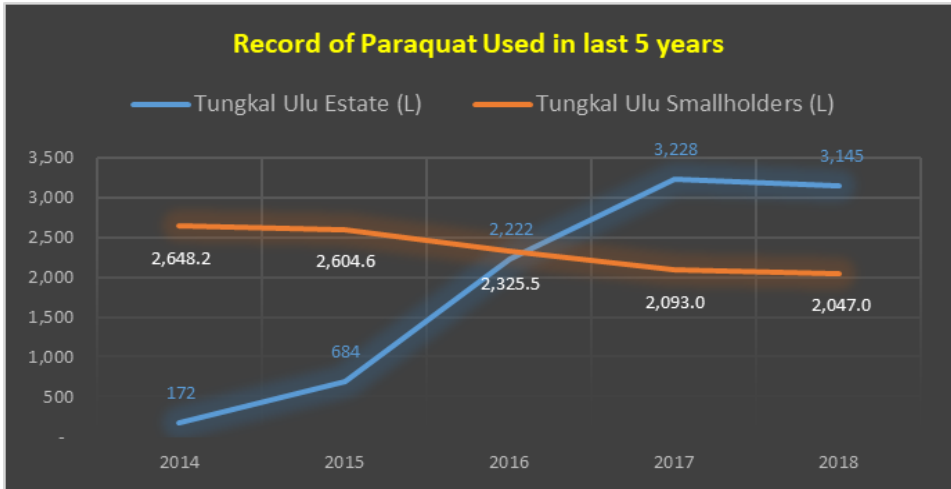
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| | <p>- Dispatch slipnote Tungkal Ulu POM No.PTUC119200235 dated 1 February 2019. Destination PT. Inti Indosawit Subur-Teluk Bagus, Rengat. Commodity CPO Certified RSPO. Supply Chain Model Mass Balance. RSPO Certificate No.RSPO594422. DO No.01329/DB10/02/19. Transporter PT. Sumber Kencana Inhu, No. SK.04/SKI/02/19; Vehicle No.BM9815BU. Volume dispatched 24.620 MT. Batch No.RSPO564422.</p> | | |
| Corrections: | <p>PT IIS Tungkal Ulu has made coordination and communication with Marketing Head Office Medan to correct the certificate number in slipnote for delivery of CSPO/CSPK to customer manually and by system WBS (Weighbridge System). Certificate number has been revised from RSPO 564422 to become RSPO 594422. During verification audit can be demonstrated that the certificate number in the in slipnote for delivery of CSPO/CSPK was correct and appropriate.</p> <p>Verification of certificate number also taken for weighbridge ticket and shown that the certificate number is aligned with slipnote for delivery of CSPO/CSPK. Sample seen: slipnote for delivery of CSPO/CSPK to PT Sari Dumai Sejati, DO No. 07012/DB10/02/19 dated 8 July 2019, No. Ref. RSPO Cert = RSPO 594422; Weighbridge Ticket No. PTUC119101072 dated 8 July 2019, Commodity: CPO Certified RSPO, Netto 23,190 kg, DO No. 07012/DB10/02/19 for PT Sari Dumai Sejati, RSPO Cert.: RSPO594422.</p> | | |
| Root Cause Analysis: | <p>Human error by Marketing HO Medan whose input the number of certificate in the dispatch slipnote for delivery of CSPO to customer, and there is no control and monitoring from PT IIS – Tungkal Ulu to ensure the appropriate number of certificate.</p> | | |
| Corrective Actions: | <p>PT IIS Tungkal Ulu POM has assigned the PIC to monitor the administration for delivery of CSPO/CSPK to customer including the correct number of RSPO certificate in the document of slipnote for delivery of CSPO/CSPK and Weighbridge Ticket. PIC appointed was Mr. Ridwan (Kerani Produksi) through Memorandum No. 139/MGR/PTU/VII/19, July 2019 signed by Senior Mill Manager Tungkal Ulu POM.</p> | | |
| Assessment Conclusion: | <p>Auditee has demonstrated Weighbridge ticket and dispatch slipnote that described correct RSPO certificate number RSPO594422. Memorandum from Tungkal Ulu Mill Manager No. 139/MGR/PTU/VII/19 described PIC for checking RSPO certificate number on delivery records was demonstrated during verification audit. The corrective actions made are sufficient and accepted. This Major NC is closed on 7 August 2019.</p> | | |
| Nonconformity | | | |
| NCR Ref # | 1761451-201905-M6 | Clause & Category (Major / Minor) | RSPO SCCS, June 2017 - General Chain of Custody Requirement- Clause 5.9.1 |
| Date Issued | 24 May 2019 | Due Date | 21 August 2019 |
| Closed (Yes / No) | Yes | Date of nonconformity Closure | 7 August 2019 |
| Statement of Nonconformity: | <p>PT. Inti Indosawit Subur – Tungkal Ulu POM cannot demonstrate maintain accurate RSPO certificate details in the dispatch slipnote for delivery of CSPO to customer.</p> | | |
| Requirement Reference: | <p>The organization shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements.</p> | | |
| Objective Evidence: | <p>Incorrect RSPO Certificate number of the seller identified in contract - delivery order - dispatch note:</p> | | |

| | |
|-------------------------------|---|
| | <p>Contract: "Kontrak Penjualan No.03003/CB-10/02/19 antara PT. Inti Indosawit Subur dan PT. Sari Dumai Sejati" dated 1 March 2019 for sales of 487,860 kg commodity Miyak Kelapa Sawit RSPO; Supply Chain Model Mass Balance; Certificate RSPO 564422.</p> <p>Delivery Order: Delivery Order PT. Inti Indosawit Subur No.03003/DB10/02/19 dated 1 March 2019, instruction to PT. Inti Indosawit Subur - Manager Tangki Timbun Rengat to deliver 487,860 kg commodity Minyak Kelapa Sawit RSPO; Supply Chain Model Mass Balance; No.Ref.RSPO 564422.</p> <p>Dispatch slipnote: <ul style="list-style-type: none"> - Dispatch slipnote Tungkal Ulu POM No.PTUC118202500 dated 1 December 2018. Destination PT. Inti Indosawit Subur-Teluk Bagus, Rengat. Commodity CPO Certified RSPO. Supply Chain Model Mass Balance. RSPO Certificate No.RSPO594422. DO No.11329/DB10/02/18. Transporter PT. Sumber Kencana Inhu, No. SK.01/SKI/12/10; Vehicle No.BM8884BU. Volume dispatched 22.920 MT. Batch No.RSPO564422. - Dispatch slipnote Tungkal Ulu POM No.PTUC119200235 dated 1 February 2019. Destination PT. Inti Indosawit Subur-Teluk Bagus, Rengat. Commodity CPO Certified RSPO. Supply Chain Model Mass Balance. RSPO Certificate No.RSPO594422. DO No.01329/DB10/02/19. Transporter PT. Sumber Kencana Inhu, No. SK.04/SKI/02/19; Vehicle No.BM9815BU. Volume dispatched 24.620 MT. Batch No.RSPO564422. </p> |
| Corrections: | <p>PT IIS Tungkal Ulu has made coordination and communication with Marketing Head Office Medan to correct the certificate number in slipnote for delivery of CSPO/CSPK to customer manually and by system WBS (Weighbridge System). Certificate number has been revised from RSPO 564422 to become RSPO 594422. During verification audit can be demonstrated that the certificate number in the in slipnote for delivery of CSPO/CSPK was correct and appropriate. Verification of certificate number also taken for weighbridge ticket and shown that the certificate number is aligned with slipnote for delivery of CSPO/CSPK. Sample seen: slipnote for delivery of CSPO/CSPK to PT Sari Dumai Sejati, DO No. 07012/DB10/02/19 dated 8 July 2019, No. Ref. RSPO Cert = RSPO 594422; Weighbridge Ticket No. PTUC119101072 dated 8 July 2019, Commodity: CPO Certified RSPO, Netto 23,190 kg, DO No. 07012/DB10/02/19 for PT Sari Dumai Sejati, RSPO Cert.: RSPO594422.</p> |
| Root Cause Analysis: | <p>Human error by Marketing HO Medan whose input the number of certificate in the dispatch slipnote for delivery of CSPO to customer, and there is no control and monitoring from PT IIS – Tungkal Ulu to ensure the appropriate number of certificate.</p> |
| Corrective Actions: | <p>PT IIS Tungkal Ulu POM has assigned the PIC to monitor the administration for delivery of CSPO/CSPK to customer including the correct number of RSPO certificate in the document of slipnote for delivery of CSPO/CSPK and Weighbridge Ticket. PIC appointed was Mr. Ridwan (Kerani Produksi) through Memorandum No. 139/MGR/PTU/VII/19, July 2019 signed by Senior Mill Manager Tungkal Ulu POM.</p> |
| Assessment Conclusion: | <p>Auditee has demonstrated Weighbridge ticket and dispatch slipnote that described correct RSPO certificate number RSPO594422. Memorandum from Tungkal Ulu Mill Manager No. 139/MGR/PTU/VII/19 described PIC for checking RSPO certificate number on delivery records was demonstrated during verification audit. The corrective actions made are sufficient and accepted. This Major NC is closed on 7 August 2019.</p> |

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| Nonconformity | | | |
|------------------------------------|--|--|--|
| NCR Ref # | 1761451-201905-N1 | Clause & Category (Major / Minor) | RSPO P&C INA-NI, September 2016; Indicator 2.1.2 |
| Date Issued | 24 May 2019 | Due Date | Next ASA |
| Closed (Yes / No) | No | Date of nonconformity Closure | Next ASA |
| Statement of Nonconformity: | PT. Inti Indosawit Subur – Tungkal Ulu have not maintained written information on legal requirements. | | |
| Requirement Reference: | A documented system, which includes written information on legal requirements, shall be maintained. | | |
| Objective Evidence: | <p>PT. Inti Indosawit Subur have prepared the list of relevant laws and regulation. However, the certificate holder unable to demonstrate a complete and applicable regulation, as identified in the RSPO P&C 2013, Indonesia National Interpretation, September 2016 – appendix 1.</p> <p>PT. Inti Indosawit Subur have not identified and evaluated these applicable regulations:</p> <ul style="list-style-type: none"> • Undang-undang No.80 tahun 1957 tentang Ratifikasi Konvensi ILO No. 100 tahun 1951 tentang Pengupahan yang sama Bagi Pekerja Laki-laki dan Wanita untuk Pekerjaan yang Sama Nilainya; • Undang-undang No.19 tahun 1999 tentang Ratifikasi ILO Convention No.105 tahun 1957 mengenai Penghapusan Kerja Paksa; • Undang-undang No.20 tahun 1999 tentang Ratifikasi ILO Convention No.138 tahun 1973 tentang Batas Usia Minimum; • Undang-undang No.29 tahun 1999 tentang Ratifikasi Konvensi Internasional tentang Penghapusan Segala Bentuk Diskriminasi (Convention on the Elimination of All Forms of Racial Discrimination - CERD); • Undang-undang No.24 tahun 2011 tentang Badan penyelenggara Jaminan Sosial; • Peraturan Menteri Tenaga Kerja No.4 tahun 1987 tentang P2K3 serta Tatacara Penunjukan Ahli K3; • Peraturan Menteri Tenaga Kerja No.7 tahun 2007 tentang Baku Mutu Sumber Tidak Bergerak bagi Ketel Uap; • Peraturan Menteri Tenaga Kerja No.9 tahun 2010 tentang Operator dan Petugas Pesawat Angkat dan Angkut; • Keputusan Menteri Tenaga Kerja No.100 tahun 2004 tentang Ketentuan Pelaksanaan Perjanjian Kerja Waktu Tertentu (PKWT); • PP No. 101 tahun 2014 tentang Pengelolaan Limbah B3; • Peraturan Menteri Lingkungan Hidup Dan Kehutanan Republik Indonesia Nomor P.20/MENLHK/SETJEN/KUM.1/6/2018 Tentang Jenis Tumbuhan Dan Satwa Yang Dilindungi. | | |
| Corrections: | <ul style="list-style-type: none"> • Give awareness to the PIC (Humas) By Sustainability Team regarding the mechanism of regulation updating and ensure the PIC performing the regulation updating once a year as per procedure. • Updating the newest relevant regulation accordingly. | | |
| Root Cause Analysis: | <ul style="list-style-type: none"> • PIC (Humas) to conduct regular update of relevant regulation are not aware regarding how to update and get the new regulation. | | |

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| | <ul style="list-style-type: none"> Internal audit RSPO has not cover and ensure the newest regulation has been updated. | | | | | | | | | | | | | | | | | | | | |
|------------------------------------|--|--|--|------|------------------------|------------------------------|------|-----|---------|------|-----|---------|------|---------|-------|------|-------|---------|------|-------|---------|
| Corrective Actions: | Conducted regular internal audit RSPO covering the checking of updating the newest regulation and ensure the evaluation has been performed and updated. | | | | | | | | | | | | | | | | | | | | |
| Assessment Conclusion: | The effectiveness of corrective actions will be verified during next surveillance assessment. | | | | | | | | | | | | | | | | | | | | |
| Nonconformity | | | | | | | | | | | | | | | | | | | | | |
| NCR Ref # | 1761451-201905-N2 | Clause & Category (Major / Minor) | RSPO P&C INA-NI, September 2016; Indicator 4.6.4 | | | | | | | | | | | | | | | | | | |
| Date Issued | 24 May 2019 | Due Date | Next ASA | | | | | | | | | | | | | | | | | | |
| Closed (Yes / No) | No | Date of nonconformity Closure | Next ASA | | | | | | | | | | | | | | | | | | |
| Statement of Nonconformity: | The Certificate Holder has no commitment and effort to minimizing and eliminating of Paraquat used. | | | | | | | | | | | | | | | | | | | | |
| Requirement Reference: | The evidence shall be available to demonstrate that use of Pesticides, categorized in Class 1A or 1B by World Health Organization, or those are listed in the Stockholm and Rotterdam Conventions, and paraquat are not used, except in specific situations identified in national Best Practice guidelines. The use of such pesticides shall be minimized and eliminated as part of a plan, and shall only be used in exceptional circumstances. | | | | | | | | | | | | | | | | | | | | |
| Objective Evidence: | <p>According to Record of Paraquat used in last 5 years (2014 – 2018), volume of Paraquat used in Tungkal Ulu Estate is significant increasing within 2015 to 2017, as shown on graphic below:</p>  <table border="1"> <caption>Record of Paraquat Used in last 5 years</caption> <thead> <tr> <th>Year</th> <th>Tungkal Ulu Estate (L)</th> <th>Tungkal Ulu Smallholders (L)</th> </tr> </thead> <tbody> <tr> <td>2014</td> <td>172</td> <td>2,648.2</td> </tr> <tr> <td>2015</td> <td>684</td> <td>2,604.6</td> </tr> <tr> <td>2016</td> <td>2,325.5</td> <td>2,222</td> </tr> <tr> <td>2017</td> <td>3,228</td> <td>2,093.0</td> </tr> <tr> <td>2018</td> <td>3,145</td> <td>2,047.0</td> </tr> </tbody> </table> | | | Year | Tungkal Ulu Estate (L) | Tungkal Ulu Smallholders (L) | 2014 | 172 | 2,648.2 | 2015 | 684 | 2,604.6 | 2016 | 2,325.5 | 2,222 | 2017 | 3,228 | 2,093.0 | 2018 | 3,145 | 2,047.0 |
| Year | Tungkal Ulu Estate (L) | Tungkal Ulu Smallholders (L) | | | | | | | | | | | | | | | | | | | |
| 2014 | 172 | 2,648.2 | | | | | | | | | | | | | | | | | | | |
| 2015 | 684 | 2,604.6 | | | | | | | | | | | | | | | | | | | |
| 2016 | 2,325.5 | 2,222 | | | | | | | | | | | | | | | | | | | |
| 2017 | 3,228 | 2,093.0 | | | | | | | | | | | | | | | | | | | |
| 2018 | 3,145 | 2,047.0 | | | | | | | | | | | | | | | | | | | |

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| | There is not enough evidence that the Certificate Holder has plan to eliminate Paraquat uses for any reason in the future. | | |
| Corrections: | Find the new alternative formula/material to substitute the paraquat usage and stop the paraquat usage after November 2019. | | |
| Root Cause Analysis: | Based on best management practice agronomy and internal policy of Asian Agri Group, paraquat remain use as a herbicide for particular use such as hard weeds and nursery and currently company has not been deternied and found the best substitution formula to change the paraquat usage. | | |
| Corrective Actions: | Ensure the company not use the paraquat after November 2019 | | |
| Assessment Conclusion: | The effectiveness of corrective actions will be verified during next surveillance assessment. | | |
| Nonconformity | | | |
| NCR Ref # | 1761451-201905-N3 | Clause & Category (Major / Minor) | RSPO P&C INA-NI, September 2016; Indicator 6.1.4 |
| Date Issued | 24 May 2019 | Due Date | Next ASA |
| Closed (Yes / No) | No | Date of nonconformity Closure | Next ASA |
| Statement of Nonconformity: | <p>PT Inti Indosawit Sawit – Tungkal Ulu was consistent in conducting periodic review of plan for management and monitoring of social impacts (minimum 2 years basis), last review was conducted in 2 January 2018 recorded on "Rencana Kelola Sosial Kebun Tungkal Ulu"</p> <p>However, there was 4 of 5 point of plan for management and monitoring of social impacts as in document of Social Impact Assessment Bab VII. "Rencana Kelola Sosial PT Inti Indosawit Subur Kebun Tungkal Ulu" has not been reviewed (dated 2 January 2018).</p> | | |
| Requirement Reference: | The documented plan for management and monitoring of social impacts, shall be reviewed at least on two-yearly basis. If necessary, the plan should be updated. There shall be evidence that the review process includes participation of all affected parties. | | |
| Objective Evidence: | <p>PT Inti Indosawit Sawit – Tungkal Ulu was consistent in conducting periodic review of plan for management and monitoring of social impacts (minimum 2 years basis), last review was conducted in 2nd January 2018 recorded on "Rencana Kelola Sosial Kebun Tungkal Ulu"</p> <p>However, there was 4 of 5 point of plan for management and monitoring of social impacts as in document of Social Impact Assessment Bab VII. "Rencana Kelola Sosial PT Inti Indosawit Subur Kebun Tungkal Ulu" has not been reviewed (dated 2 January 2018), such as:</p> <ul style="list-style-type: none"> • 7.1. "Rencana Kelola Sosial Aspek Tenural": legalitas kemitraan dan plasma WD) • 7.2. "Rencana Kelola Sosial Aspek Pola Kerjasama": pola kerjasama dan pelatihan pembinaan • 7.3. "Rencana Kelola Sosial terkait Aspek Sosial Ekonomi Pedesaan dan Pemberdayaan Masyarakat": pemeliharaan jalan/jembatan desa dan jalan produksi plasma, standar mutu TBS & sortasi, kelembagaan petani, replanting, program bantuan CSR dan permasalahan lainnya. • 7.5. "Rencana Kelola Sosial terkait Permasalahan Lingkungan Hidup". | | |

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|-------------------------------|---|
| | The review of plan for management and monitoring of social impacts has only discussed point 7.4 "Rencana kelola social aspek ketenagakerjaan PT Inti Indosawit Subur". |
| Corrections: | <ul style="list-style-type: none"> Appointed the PIC to review the effectiveness of management and monitoring of social program in according to SIA. Monitor the SIA review each 2 year by management site and sustainability team. |
| Root Cause Analysis: | Tungkal Ulu POM has not determined the appointed person/PIC to conduct regular review regarding SIA management and monitoring. |
| Corrective Actions: | Regularly monitor and review the SIA management and monitoring. |
| Assessment Conclusion: | The effectiveness of corrective actions will be verified during next surveillance assessment. |

| Opportunity for Improvements | |
|-------------------------------------|-------------|
| OFI # | Description |
| OFI 1 | Nil |

| Positive Findings | |
|--------------------------|---|
| PF # | Description |
| PF 1 | Good hospitality during stay in PT Inti Indosawit Subur – Tungkal Ulu Estate Guest House. |

3.4.1 Status of Nonconformities Previously Identified and Observations

| Non-Conformity | | | |
|------------------------------------|---|--|--|
| NCR Ref # | 1658701-201807-N1 | Clause & Category (Major / Minor) | RSPO P&C INA-NI, September 2016; Indicator 2.2.2 |
| Closed (Yes / No) | Yes | Date of nonconformity Closure | 24 June 2019 |
| Statement of Nonconformity: | Legal boundaries in sample of smallholder's plot are not found. | | |
| Requirement Reference: | Legal boundaries are demonstrated clearly and maintained. | | |
| Objective Evidence: | During site visit at sample of smallholder's plot as follow: 1. KUD Sawit Kita (SP-2): Block/Hamparan 4 Plot No. 295. 2. KUD Panca Mukti (SP-5): Block/Hamparan 10 Plot No. 3301 and 3298 Auditor did not found that boundary poles are in place. | | |
| Corrective Actions: | <ul style="list-style-type: none"> Replacing the missing boundary pole, for example in KUD Sawit Kita (SP-2), Hamparan 4 Plot No. 295 and in KUD Panca Mukti (SP-5) Hamparan 10 Plots No. 3301 and 3298 Create an inventory of farmers' boundaries Make monitoring and checklist for maintenance of boundary pole in plots every 6 months. | | |
| Assessment Conclusion: | Based on field observation during this ASA 1.2 in sample of smallholders, all boundaries are clearly visible and well maintained. Therefore, the corrective action made is sufficient and implemented. This NC can be CLOSED effectively. | | |

| Non-Conformity | | | |
|------------------------------------|--|--|--|
| NCR Ref # | 1658701-201807-N2 | Clause & Category (Major / Minor) | RSPO P&C INA-NI, September 2016; Indicator 5.1.3 (Minor) |
| Closed (Yes / No) | No | Date of nonconformity Closure | N/A |
| Statement of Nonconformity: | Environmental monitoring was not implemented as per RPL (Rencana Pemantauan Lingkungan) document. | | |
| Requirement Reference: | Environment monitoring plan document, its implementation report, and the corrective plan (if non-conformance arised from the monitoring result) shall be available. This plan is reviewed on two-yearly basis. | | |
| Objective Evidence: | <p>PT IIS Tungkal Ulu has Environmental monitoring plan document presented in RPL (Rencana Pemantuan Lingkungan) Document and has been approved through "Keputusan Bupati Tanjung Jabung Barat Nomor 309 Tahun 2009 tentang Persetujuan Analisis Dampak Lingkungan, Rencana Pengelolaan Lingkungan dan Rencana Pemantauan Lingkungan Kegiatan PMKS PT Inti Indosawit Subur di Kecamatan Merlung Kab. Tanjung Jabung Barat" dated 6 July 2009.</p> <p>As per environment monitoring plan stated that company shall be perform soil analysis twice a year, however soil analysis performed once a year.</p> <p>Soil analysis in 2017 conducetd on 5 May 2017 by BINALAB certificate No. 052-2/T/BINA/VI/2017. Soil sampling analysis in 2018 conducted on 23 April 2018 (the result has not been issued by BINALAB).</p> | | |
| Corrective Actions: | <ul style="list-style-type: none"> - Prepared the schedule on program of soil analysis sampling schedule - To filing the soil analysis sampling schedule - Appoint a PIC to monitor the schedule and implementation of soil sampling. | | |
| Assessment Conclusion: | <p>ASA-1.2</p> <p>No evidence that Soil Analysis conducted twice a year as environment management and monitoring plan directive (matriks RKL-RPL). There is no justification if monitoring plan amended and informed officially.</p> <p>Soil Quality Analysis Report from BINALAB, No: 104-2/BINA/V/2018, dated 23 April 2018. Soil analysis for year 2018 conducted once a year, therefore it is not comply as required by environment management plan (RPL).</p> <p>Escalate to MAJOR</p> | | |

| Opportunity for Improvement | |
|-----------------------------|-------------|
| OFI# | Description |
| OFI 1 | Nil |

3.4.2 Summary of the Nonconformities and Status

| CAR Ref. | Category (Major / Minor) | P&C Indicator | Issued Date | Status & Date (Closure) |
|-----------|--------------------------|---------------|-------------|-------------------------|
| A824193/1 | Major NC | 5.3.2 | 14/12/2012 | 10/02/2013 |
| A824193/1 | Minor NC | 4.4.2 | 14/12/2012 | 30/06/2014 |

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|-------------------|----------|------------|------------|-----------------------|
| A824193/3 | Minor NC | 4.6.5 | 14/12/2012 | 30/06/2014 |
| A824193/2 | Minor NC | 4.4.2 | 14/12/2012 | 30/06/2014 |
| 1055357M17 | Major NC | 2.2.1 | 30/06/2014 | 25/08/2014 |
| 1055357N15 | Minor NC | 4.7.9 | 30/06/2014 | 16/08/2015 |
| 1055357N6 | Minor NC | 5.3.3 | 30/06/2014 | 23/06/2015 |
| 1055357N16 | Minor NC | 5.3.4 | 30/06/2014 | 23/06/2015 |
| 1055357N18 | Minor NC | 2.2.1 | 30/06/2014 | 23/06/2015 |
| 1202625M1 | Major NC | 4.7.1 | 23/06/2015 | 16/08/2015 |
| 1202625M2 | Major NC | 4.7.4 | 23/06/2015 | 16/08/2015 |
| 1202625M3 | Major NC | 4.7.5 | 23/06/2015 | 16/08/2015 |
| 1202625M4 | Major NC | 6.13.1 | 23/06/2015 | 16/08/2015 |
| 1202625N1 | Minor NC | 3.1.2 | 23/06/2015 | 17/06/2016 |
| 1202625N2 | Minor NC | 4.3.3 | 23/06/2015 | 17/06/2016 |
| 1202625N3 | Minor NC | 4.6.10 | 23/06/2015 | 17/06/2016 |
| 1202625N4 | Minor NC | 4.8.2 | 23/06/2015 | 17/06/2016 |
| 1338577M2 | Major NC | 4.7.3 | 18/06/2016 | 15/08/2016 |
| 1207373N3 | Major NC | 4.6.10 | 18/06/2016 | 15/08/2016 |
| 1338577N1 | Minor NC | 2.1.3 | 18/06/2016 | Closed 1/08/2017 |
| 1338577N2 | Minor NC | 2.2.2 | 18/06/2016 | Closed 1/08/2017 |
| 1338577N3 | Minor NC | 4.6.4 | 18/06/2016 | Closed 1/08/2017 |
| 1338577N4 | Minor NC | 4.7.5 | 18/06/2016 | Escalated to Major NC |
| 1338577N5 | Minor NC | 4.7.6 | 18/06/2016 | Closed 1/08/2017 |
| 1509721-201707-M1 | Major NC | 4.7.1 | 1/08/2017 | Closed 22/09/2017 |
| 1509721-201707-M2 | Major NC | 4.7.2 | 1/08/2017 | Closed 22/09/2017 |
| 1509721-201707-M3 | Minor NC | 4.6.2 | 1/08/2017 | Closed 22/09/2017 |
| 1509721-201707-M4 | Minor NC | 4.7.5 | 1/08/2017 | Closed 22/09/2017 |
| 1509721-201707-N1 | Minor NC | 5.3.3 | 1/08/2017 | Closed 14/07/2018 |
| 1509721-201707-N2 | Minor NC | 5.4.1 | 1/08/2017 | Closed 14/07/2018 |
| 1658701-201807-M1 | Major NC | 2.1.1 | 14/07/2018 | Closed 04/09/2018 |
| 1658701-201807-M2 | Major NC | 4.6.1 | 14/07/2018 | Closed 04/09/2018 |
| 1658701-201807-M3 | Major NC | 4.7.3 | 14/07/2018 | Closed 04/09/2018 |
| 1658701-201807-M4 | Major NC | 5.3.2 | 14/07/2018 | Closed 04/09/2018 |
| 1658701-201807-N1 | Minor NC | 2.2.2 | 14/07/2018 | Closed on 24/05/2019 |
| 1658701-201807-N1 | Minor NC | 5.1.3 | 14/07/2018 | Escalated to Major NC |
| 1761451-201905-M1 | Major NC | 1.2.1 | 24/05/2019 | Closed on 07/08/2019 |
| 1761451-201905-M2 | Major NC | 5.1.3 | 24/05/2019 | Closed on 07/08/2019 |
| 1761451-201905-M3 | Major NC | SCCS 5.3.2 | 24/05/2019 | Closed on 07/08/2019 |
| 1761451-201905-M4 | Major NC | SCCS 5.5.2 | 24/05/2019 | Closed on 07/08/2019 |
| 1761451-201905-M5 | Major NC | SCCS 5.6.1 | 24/05/2019 | Closed on 07/08/2019 |
| 1761451-201905-M6 | Major NC | SCCS 5.9.1 | 24/05/2019 | Closed on 07/08/2019 |
| 1761451-201905-N1 | Minor NC | 2.1.2 | 24/05/2019 | Open |
| 1761451-201905-N2 | Minor NC | 4.6.4 | 24/05/2019 | Open |
| 1761451-201905-N3 | Minor NC | 6.1.4 | 24/05/2019 | Open |

3.5. Stakeholders Consultation

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

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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.

| List of Stakeholders Contacted | |
|--|---|
| Internal Stakeholders <ul style="list-style-type: none"> - Gender Committee, Worker Union and Workers of Tungkal Ulu Estate and POM | Union/Contractors/Local Communities <ul style="list-style-type: none"> - Head of Cinta Damai Village, Head of Adipurwa Village, Head of Bukit Indah Village and Head of Kemang Manis Village, Chairman of KUD Bina Usaha and KUD Argo Makmur |
| Government Departments <ul style="list-style-type: none"> - Dinas Lingkungan Hidup Kabupaten Tanjung Jabung Barat – Environmental Agency - Kantor Pertanahan Kabupaten Tanjung Jabung Barat – National Land Agency - Dinas Tenaga Kerja dan Transmigrasi Kabupaten Tanjung Jabung Barat – Manpower Office | NGO <ul style="list-style-type: none"> - Yayasan SETARA Jambi – Local NGO - Letter to comment were sent to: Forest Watch Indonesia, Sawit Watch, Aid Environment, WWF Indonesai. No reply received. |

| IS # | Description |
|-------------|--|
| 1 | <p>Dinas Lingkungan Hidup Kabupaten Tanjung Jabung Barat – Environmental Agency</p> <p>Feedbacks:</p> <ul style="list-style-type: none"> - PT Inti Indosawit Subur – Tungkal Ulu has established environmental document in the form of AMDAL and has reported the implementation of RKL-RPL periodically to Dinas Lingkungan of Tanjung Jabung Barat Regency. Last report for period second semester year 2018 (July-December 2018) - PT Inti Indosawit Subur - Tungkal Ulu have a permit for land application from mill to plantation as an organic fertilizer, and has reported the implementation of waste water application as well as the waste water quality monitoring - There are no reports from stakeholders related to environmental pollution caused by the operation of the garden or the PKS. - There is no land fire in the area of Tungkal Ulu Estate. Fire monitoring and firefighting reported routinely to environmental office. - In 2018 there are no environmental issues, either from the community or from NGOs. <p>Management Responses:</p> <ul style="list-style-type: none"> - PT Inti Indosawit Subur – Tungkal Ulu has positive response, in regards with the BLH Tanjung Jabung Barat views of the company. - PT Inti Indosawit Subur – Tungkal Ulu has commitment to improve and enhance the environmental |

| | |
|--|---|
| | management and monitoring implementation to realize an environmentally friendly company. |
| | <p>Audit Team Findings:</p> <ul style="list-style-type: none"> - PT Inti Indosawit Subur – Tungkal Ulu has implemented the environmental management and monitoring plan according to RKL-RPL document and reported regularly to BLH Tanjung Jabung Barat Regency. - Environmental control programs around the plantation area (surrounding villages) have been conducted to continue |

| IS # | Description |
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| 2 | <p>Kantor Pertanahan Kabupaten Tanjung Jabung Barat – National Land Agency</p> <p>Feedbacks:</p> <ul style="list-style-type: none"> - No issue recorded - Maintenance of HGU stakes routinely done by making the maintenance program of the stakes every year. <p>Management Responses:</p> <p>The periodic maintenance program has conducted twice a year, for the period of July-December 2018 (second semester) and as the person responsible is PR based on the Boundary Maintenance procedure no. KTU-WI-001, dated 1/12/2016</p> <p>Audit Team Findings:</p> <p>Based on documents verification and field visits, it can be shown that upon this time of the audit there is no land disputes have occurred, the company has conducted regular checks of HGU stakes regularly and river border (conservation area) and no community land tenure activities.</p> |

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| 3 | <p>Dinas Tenaga Kerja dan Transmigrasi Kabupaten Tanjung Jabung Barat – Manpower Office</p> <p>Feedbacks:</p> <ul style="list-style-type: none"> - PT Inti Indosawit Subur – Tungkal Ulu has complied with the minimum wage payment in accordance with the applicable regulations for based on UMP of Jambi Province year 2018 - All employees in PT Inti Indosawit Subur Tungkal Ulu have registered to the BPJS ketenagakerjaan programme. - There is no report related to the use of female laborers at night or the use of child labor/forced labor by company (The plantation sector is the worst sector against the use of female laborers at night and the use of child labor). - PT Inti Indosawit Subur – Tungkal Ulu has established the organizational structure of P2K3 and has registered by Dinas Tenaga Kerja Kabupaten Tanjung Jabung Barat. - PT Inti Indosawit Subur – Tungkal Ulu has realized the provision of PPE for its employees but the consistency of the use of PPE by the workers needs to be improved. - PT Inti Indosawit Subur – Tungkal Ulu has handled the case of accidents well related to the reporting and handling of BPJS claims of employment. - PT Inti Indosawit Subur – Tungkal Ulu has submitted the P2K3 Periodical Report to the Department of Manpower. - PT Inti Indosawit Subur – Tungkal Ulu has conducted periodic health checks for all workers, especially workers who working at hazardous stations including sprayers and fertilizers. - Heavy equipment operators, conveyances, levers, steamers and others have licenses as operators (SIOs). - Disputes: Until the audit has conducted, there are no reports related to disputes. |



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| | <ul style="list-style-type: none"> - The company has provided infrastructure that aims to improve the welfare of employees for example, housing, electricity, clean water, health facilities, educational facilities. |
| | <p>Management Responses:</p> <ul style="list-style-type: none"> - Worker Agreement has registered by Dirjen Pembinaan Hubungan Industrial dan Jaminan Sosial Tenaga Kerja No. Kep. 88/PHIJSK-PKKAD/PKB/VI/2015, dated 18th June 2015 (Valid 21st April 2015 - 20th April 2017). Base on latter from BKS PPS (Badan Kerja Sama Perusahaan Perkebunan Sumatera) no. 72/BKS-PPS/2017, on 12 July 2017 concerning validation of PKB, describe that: discusses about PKB period 2017-2019 is still on discuses. - PT Inti Indosawit Sawit Subur – Tungkal Ulu has been implementing OHS management both in mill and estate were according to regulation. HIRADC has been determined and the control of hazard and risk has implemented and improved each year. - The use of PPE has consistent applied and monitored by company. - The Company has also requested training to get the Operator License (SIO) to all operators’ heavy equipment in estate and Boiler operator in mill. |
| | <p>Audit Team Findings:</p> <ul style="list-style-type: none"> - Based on interview with management that company has taken action in accordance with well-established procedures and persuasive approach, so there is no issue occurs. - With respect to wages, the use of PPE and SIO, the company has implemented in accordance with relevant law and regulations. - Company has implementing OHS management both in mill and estate were according to regulation. |

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| 4 | <p>Yayasan SETARA Jambi – Local NGO</p> <p>Feedbacks:</p> <ul style="list-style-type: none"> - SETARA Jambi only focused on independent smallholder’s development, for smallholder’s scheme (Plasma) are responsible of the company - Partnership program between Yayasan SETARA Jambi and Tungkal Ulu POM as conducted since 2016 with 500 independent smallholders under Community Shared Value (CSV) program. - Program which developed by this organization is more concern for FFB sources traceability that supplied to Tungkal Ulu POM. The program commences by assisting independent smallholders where located surrounding the plantation company using tracking system with several criteria, such as: palm which planted by smallholder’s are not from the land burning, FFB source not from forest area or illegal area and preparing to comply with RSPO standard. Each area of independent smallholders is verified by pointing the coordinates, which aims that all FFB that supplied to Mill are traceable. - We as an NGO’s have been assigned to assist an independent smallholder that supplied FFB’s to Tungkal Ulu POM should be following the company rules and also comply with applicable laws (i.e.: helping the process of registration for smallholder’s land to government or known as STDB). - FFB price for independent smallholder’s is following the applicable price which determined by Plantation agency. <p>Management Responses:</p> <ul style="list-style-type: none"> - PT Inti Indosawit Subur – Tungkal Ulu has a commitment in involving the independent smallholder’s through Community Shared Value (CSV) Program. - The program aims to provide access for independent smallholder’s in order to manage of their oil palm responsibly, such as by assisting the seed sourced that will be replanted and independent smallholder’s area shall not source from illegal area, land burnt, forest area, and the farmers/group must be allowed to provide the traceability of their FFB’s. <p>Audit Team Findings:</p> <ul style="list-style-type: none"> - During field observation on Mill, all the FFB’s from third parties sources including independent smallholder are proven traceable. - There is no significant issue raised against independent smallholder. |

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| 5 | <p>Kepala Desa dan Ketua KUD <i>Head of Cinta Damai Village, Head of Adipurwa Village, Head of Bukit Indah Village and Head of Kemang Manis Village, Chairman of KUD Bina Usaha and KUD Argo Makmur.</i></p> <p>Feedbacks:</p> <ol style="list-style-type: none"> 1. KUD Bina Usaha: Sorting FFB in the Tungkal Ulu Mill to make it more transparent, several weeks there are high sorting of 300-400 kg. 2. KUD Argo Makmur: - Re-socialization can be carried out related to the replanting plan in 2022/2023. - There are still ± 10% TBS of KUD Argo Makmur farmers sold to other factories (PT CKT) at relatively the same price. 3. Control of fertilizer warehouses in some KUD have inadequate capacity, for example: KUD Argo Makmur (capacity of 40 tons), KUD Bina Usaha (capacity of 16 tons). <p>Management Responses:</p> <ol style="list-style-type: none"> 1. The company is sorting FFB by following Permentan No. 1 of 2018, where the implementation is carried out by "Grading Sample" method. To be more transparent the company has recommended KTH (Chairperson of the Farmers Group) to join the at the Palm Oil Mill, to witness Sorting process as a Farmer representative. 2. The company has carried out the Replanting Dissemination in general, but related costs in detail have not been discussed because they will be Replanting Year 2022/2023 and the Replanting Fee will wait from the Director General for the Year. 3. Farmers still send FFB to PT. CKT (Citra Koperasindo Tani) because the distance of the Mill is closer to the KUD Argo Makmur compared to the Tungkal Ulu Mill (difference is 25 Km). 4. The warehouse is used for temporary fertilizer storage that has been taken by the KUD from the Company before being distributed to Farmers. <p>Audit Team Findings:</p> <ul style="list-style-type: none"> - Dissemination is linked to the mechanism of providing information to be fully informed by the head of farmer groups and farmers. - The big issue is related to Plasma replanting program, so that the established program can be applied, for this in future audit will be verified again. |

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| 6 | <p>Gender Committee, Worker Union and Workers of Tungkal Ulu Estate and POM</p> <p>Feedbacks:</p> <p>There has been a meeting with the company's management on April 25, 2018, discussion related:</p> <ul style="list-style-type: none"> - There's no clarity associated with PLN subsidies (electricity) is given the company to employees. At the moment employees get subsidies IDR 40,000 per month is insufficient needs for a month, the management stated that the company will do coordination again with Regional Head-Jambi. - Need to be provided vehicle for taking waste in employee housing. Vehicles have been set to transport waste from employee housing, that is DT 09 and and DT 13. <p>Management Responses:</p> <ul style="list-style-type: none"> - Proposed electricity subsidies have delivered to RO-3 (Regional Operation 3) management and subsidies set still Rp 40,000. - For the transportation of waste from employee housing have been set dump truck DT-09 and DT-13, the responsibility is fall under Division Assistant. |

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| | <p>Audit Team Findings: A good follow up action done by the company.</p> |
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| Formal Signing-off of Assessment Conclusion and Recommendation | |
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| <p>The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that PT Inti Indosawit Subur – Tungkal Ulu has complied with the RSPO Supply Chain Certification Standard (June 2017) and audit criteria identified within the audit report. It is deemed that the management system continues to achieve its intended outcomes. Therefore, it is recommended that the certification of PT Inti Indosawit Subur – Tungkal Ulu is continued.</p> | |
| Report prepared by | Acceptance of Assessment Conclusion |
| Name: Eko Purwanto | Name: Putu Grhyate Yonata Aksa |
| Company Name: On behalf of BSI Malaysia Sdn Bhd | Company Name: PT Inti Indosawit Subur – Tungkal Ulu |
| Title: Lead Assessor | Title: Sustainability Operation |
| Signature:  | Signature: <p><i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i></p>  PUTU GRHYATE YONATA AKSA |
| Date: 20 August 2019 | Date: 20 August 2019 |

Appendix A: Summary of Findings

| Criterion / Indicator | Assessment Findings | Compliance |
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| Principle 1: Commitment to Transparency | | |
| Criterion 1.1: | | |
| Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making. | | |
| 1.1.1 | <p>List of information related to criterion 1.2 that can be accessed by relevant stakeholders shall be available.</p> <p>- Minor compliance -</p> <p>Mill and Estate: PT Inti Indosawit Subur – Tungkal Ulu has made a mechanism for request information no: AA-GL-5008.1- R1 dated on 22nd August 2011 on “Prosedur Penangan Permintaan Informasi Stakeholder”</p> <p>The company has also owned some policies for documents created by the public relations department in the company and acknowledged by plantation manager that can be accessed by public year 2019, the list comprise of 32 document, that covered:</p> <ul style="list-style-type: none"> • Legal Documents <ul style="list-style-type: none"> – a copy of SK HGU (Land Title) – a copy of AMDAL (Social and Environmental Impact Assessment) – a copy on IMB (permit to building) – a copy of Izin Lokasi Izin Prinsip – a copy of Izin Mesin Pabrik (machineries permit in Mill) • Environment Documents <ul style="list-style-type: none"> – Waste management plans – Report of waste water – Report of water management – Report of river water quality – Report of air quality. – Report of RKL (Environmental Management Plan) – RPL (Environmental Monitoring Plan). – Report of Hazardous Waste – HCV assessment • Social Activity Documents | Comply |

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| | | <ul style="list-style-type: none"> • Employment Documents <ul style="list-style-type: none"> – Jamsostek and also BPJS Kesehatan – HSE management programs <p>Smallholders: Procedure Komunikasi internal Group Sertifikasi, no. 007/DOK/SOP/AA/2016. Scheme Manager cooperated with scheme smallholders has provide list of documents able to access by their stakeholders, last review in January 2019, the list comprise of 8 documents that covered, such as:</p> <ul style="list-style-type: none"> – Legal requirement: <ul style="list-style-type: none"> • Copy of land rights (SHM) • Akte Pendirian Koperasi - deed of establishment, • Tanda Daftar Perusahaan/TDP (Registered KUDs permit), – Operational document – Minute of annual meeting (RAT – cooperatives) – Agromony procedure or manual – Environmental document – Rencana Kerja KUD (KUDs budget) consist of projection FFB and operational cost), – Monitoring of IPM, fertilizing and harvesting, – Accident record and OHS Manual. <p>Based on interviewed with the farmer and confirmed that all visitors and all requests for information are referred to the Plasma Manager Edward Hutauruk and or Askep Mr. Nirwan Ginting and Field assistant, there are 5 Field Assistant (Mr. M. Ardiansyah I.T., Mr. Rudy J., MR. M. Azan, A.Y., Mr. Muh. Junaedi and Mr. Pahala, R. G.) and then forward will report to Group Manager.</p> | |
| 1.1.2 | <p>Records of requests for information and responses to the information requested shall be available.</p> <p>- Major compliance -</p> | <p>Mill and Estate: PT Inti Indosawit Subur – Tungkal Ulu has recoreded the request of information and its response from stakeholder into a logbook "Agenda Surat Masuk" and the response is documented in "Log Book Stakeholders – Out".</p> <p>Up to May 2019 there were 10 information request noted from stakeholder.</p> | Comply |

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| | | <p>Sample seen:</p> <ul style="list-style-type: none"> - Date 11th December 2018 request information from Balai Konservasi Sumber Daya Alam (KSDS) related to submitting the report of HCV. The information request has been responded on 11th December 2018 by followed up the information request. - Data 13th December 2018 request information form Dinas EsMD Jambi related to monitoring iof ground water usage for consumption. The information request has been responded on 18th December 2018 by submitting the report on monitoring gound water usage month November 2018. - Date 13th April 2019 request information from Manpower Agency in Tanjung Jabung Barat Regency related to "Report of Employee leave", no of report: 090-092. <p>Smallholder</p> <p>Request of information from stakeholder is documented into logbook and available for each KUD "Permintaan Informasi", up to May 2019.</p> <p>KUD Bina Usaha, comprises 4 requests from farmer and other interested parties:</p> <ul style="list-style-type: none"> - On 21th February 2019 request from Mr Tohirim (KT-10) related to road maintenance program and its realization in block – 15. The request for information has been respond by opearting the grader (heavy equipmet) to implementation road miantenacne as per request. - On 19th April 2019 request from Mr Gufron (SP-1) related to road maintenance program and its realization in block – 15. The request for information has been respond by opearting the grader (heavy equipmet) to implementation road miantenacne as per request. <p>KUD Agro Makmur, comprises a request from farmer and other interested parties, e.g: dated 7th January 2019 from Mr J Sihombing (Head of KUD) on request of queued system in Mill has been regulated. The request has been respond by the Mill on 15th January 2019.</p> <p>In KUD Harapan Jaya, comprises 4 requests from farmer and other interested parties, e.g: On 4th March request from Mr Adi (SP-9) related to road maintenance program and its realization in block 86. The request for information has been respond by opearting the grader (heavy equipmet) to implementation road miantenacne as per request.</p> | |
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| Criterion 1.2: Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes. | | | |
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| 1.2.1 | <p>Publicly available documents shall include, but are not necessarily limited to:</p> <ul style="list-style-type: none"> a) Land titles/user rights (Criterion 2.2) b) Occupational health and safety plans (Criterion 4.7) c) Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8) d) HCV documentation (Criteria 5.2 and 7.3) e) Pollution prevention and reduction plans (Criterion 5.6) f) Details of complaints and grievances (Criterion 6.3) g) Negotiation procedures (Criterion 6.4) h) Continual improvement plans (Criterion 8.1) i) Public summary of certification assessment report j) Human Rights Policy (Criterion 6.13). <p>- Major compliance –</p> | <p>Mill and Estate: PT Inti Indosawit Subur – Tungkal Ulu has prepared procedure of “Menerima dan Merespon Permintaan Informasi Stakeholder” (SOP. No.: AA-GL-5008.1-R1 dated 22 August 2011) which is manage and monitoring information request from stakeholder. The Company has also established a Matrix of Provision of Information to Stakeholders, describing the types of information that can provided to stakeholders, including legal basis, type of information and relationships with relevant agencies.</p> <p>All information requests from stakeholder will handled by relevant department, such as: CSR department responsible for inquiry from local community, media, NGO including dispute or complaint; Human Resources Department responsible for worker consultation, worker union or government authorities related to manpower/labor issue; Purchasing Department responsibility to communicate regulation’s, environment’s, health and safety and social’s requirement to all supplier. PT Inti Indosawit Subur – Tungkal Ulu POM and Estate has made a list of documents that are publicly accessible recorded in “Formulir Distribusi Informasi” (Open to Public) and is updated on 5th July 2018, such as:</p> <ul style="list-style-type: none"> – Laws and regulation document: <ul style="list-style-type: none"> a. Permit and license (Izin Lokasi, Izin Usaha Perkebunan, Hak Guna Usaha, etc.) – Environmental document: <ul style="list-style-type: none"> b. AMDAL document (SEIA), c. RKL-RPL document (environmental management and monitoring report), d. Permit for temporary hazardous waste storage, e. Waste management plan, f. Environmental policy, g. HCV identification document, h. Pollution management plan etc – OHS: <ul style="list-style-type: none"> a. Program of OHS committee (P2K3) | <p>Not Comply (1761451-201905-M1) Comply</p> |

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| | | <p>b. Report the performance of OHS program – was regularly sent to Manpower Agency per 3 months base</p> <p>c. OHS inspection checklist</p> <p>– Social document:</p> <p>a. Social Impact Assessment (SIA) “Study Evaluasi Lingkungan” which covering social impact assessment, approved by Ministry Agriculture no. 220/687/B/IV/1994,</p> <p>b. Social program and community development program,</p> <p>c. Company policies</p> <p>Smallholders: Procedure Komunikasi internal Group Sertifikasi, no. 007/DOK/SOP/AA/2016. Scheme Manager cooperated with scheme smallholders has provide list of documents able to access by their stakeholders, last review in January 2019, the list comprise of 8 documents that covered, such as:</p> <ul style="list-style-type: none"> – Legal requirement: <ul style="list-style-type: none"> • Copy of land rights (SHM) • Akte Pendirian Koperasi - deed of establishment, • Tanda Daftar Perusahaan/TDP (Registered KUDs permit), – Operational document – Minute of annual meeting (RAT – cooperatives) – Agromony procedure or manual – Environmental document – Rencana Kerja KUD (KUDs budget) consist of projection FFB and operational cost), – Monitoring of IPM, fertilizing and harvesting, – Accident record and OHS Manual. <p>Based on interviewed with the farmer and confirmed that all visitors and all requests for information are referred to the Plasma Manager Edward Hutauruk and or Askep Mr. Nirwan Ginting and Field assistant, there are 5 Field Assistant (Mr. M. Ardiansyah I.T., Mr. Rudy J., MR. M. Azan, A.Y., Mr. Muh. Junaedi and Mr. Pahala, R. G.) and then forward will report to Group Manager.</p> <p>Notice board onsite contain information such as legal register, list of HCV and RTE, OSHA and environmental plan, policies and consultation and communication procedure.</p> | |
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| | | <p>Major Non-conformities: The document related to details of complaints and grievances (Criterion 6.3) and continual improvement plans (Criterion 8.1) has not provided in the list of documents that are publicly accessible, which recorded in "Formulir Distribusi Informasi" (Open to Public) updated on 5 July 2018 for PT Inti Indosawit Subur – Tungkal Ulu and January 2019 for Scheme Smallholders.</p> <p>The organization has made a list of documents that are publicly accessible, recorded in "Formulir Distribusi Informasi" (Open to Public) updated on 5 July 2018 for PT Inti Indosawit Subur – Tungkal Ulu and January 2019 for Scheme Smallholders.</p> <p>However, the document related to Details of complaints and grievances (Criterion 6.3) and Continual improvement plans (Criterion 8.1) has not provided at the list of documents</p> | |
| <p>Criterion 1.3: Growers and millers commit to ethical conduct in all business operations and transactions.</p> | | | |
| <p>1.3.1</p> | <p>There shall be a written policy committing to a code of ethical conduct and integrity in all operations and transactions along with the documentation of socialisation process of the policy to all levels of the workers and operations.</p> <p>- Minor compliance –</p> | <p>Mill and Estate: The company has a written policy that is committed to the code of ethics and integrated in all operations and transactions presented in "Company Policy signed 1 December 2014". This policy also includes ethics in business that states ethical conduct, Prohibition of all forms of corruption, bribery in conducting or transactions in business practices and the use of fraudulent funds. Companies in communicating must behave ethically in business in all business transactions and operations, prohibiting all forms of corruption, bribery and association in the use of funds and resources.</p> <p>That policy has been informed to all employees and it has been posted in public area as well as been disseminated in every morning briefing so that all employees can access it. The policy has disseminated to all level, on 21 and 28 March 2019 to all workers in Tungkal Ulu Estate and on 20 March 2018 for contractor in Tungkal Ulu Estate. While at Tungkal Ulu Mill the policy has disseminated on 11 March 2019 to all workers and on 14 April 2019 to 3 contractors.</p> <p>Smallholders:</p> | <p>Comply</p> |

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| | | <p>The KUDs have policy ethical conduct in “Kebijakan Koperasi” dated 2 October 2017: “Berkomitmen berperilaku etis pada seluruh transaksi dan operasi, pelarangan seluruh bentuk korupsi, penyuapan dan penipuan dalam penggunaan dana dan sumber daya” (commitment to implement code of ethical conduct and integrity in all operation, no corruption, bribery and fraudulent use of fund and resources).</p> <p>The policy has been disseminated to all operation on 22 March 2019 including employees, farmers, KUD officer and several road maintenance contractors/supplier. Base on verification on document “Buku Pintar” that socialization of group’s policy on ethical conduct to all farmers has conducted on 22 March 2019.</p> | |
| <p>Principle 2: Compliance with applicable laws and regulations</p> | | | |
| <p>Criterion 2.1</p> | | | |
| <p>There is compliance with all applicable local, national and ratified international laws and regulations.</p> | | | |
| <p>2.1.1</p> | <p>Evidence of compliance with relevant legal requirements shall be available.</p> <p>- Major compliance –</p> | <p>Mill and Estate: All legal requirements comply with the regulations and laws, including those related to land status, occupational health and safety, environmental, labour, agricultural practice, and mill operation, sample seen:</p> <ul style="list-style-type: none"> - Izin Prinsip (Principle permit) No. KB.320/859/ Mentan/XI/1983, dated 7 November 1983, approved by Agriculture Ministry for PT. IIS – PIR Trans (+ 65,000 ha) and Izin Lokasi No.746, year 2006 for 1,111 ha in Kecamatan Merlung, Kabupaten Tanjung Jabung Barat, issued by Bupati Tanjung Jabung Barat. - Izin Usaha Perkebunan – Surat Pendaftaran Usaha Perkebunan/SPUP (Plantation Operational permit) No.187/Mentanhut/VII/2000, dated 3 November 2000 (±4,759.20 ha). - Izin Usaha Perkebunan Budidaya/IUP B (Plantation operational permit) No.625, year 2008, dated 26 September 2008 (± 1,111 ha). - Forest area release through “Surat Keputusan Menteri Kehutanan No.494/Kpts-II/1991 tentang Pelepasan areal hutan seluas 17,500 Ha terletak di Kelompok Hutan S. Lampisi-S. Palik-palik Kabupaten Dati II Tanjung Jabung dan Seluas 9,356Ha terletak di Kelompok Hutan S. Kehidupan-S. Singoan, Kabupaten Batanghari, Provinsi Jambi untuk Usaha Budidaya perkebunan dengan pola PIR-TRANS atas nama PT. Inti Indosawit Subur” dated 7 August 1991. - Renewal HGU No.61/HGU/BPN/2005, dated 2 June 2005, approved by BPN (3,503.02 ha). - HGU No.82/HGU/BPN RI/2014, dated 15 May 2014 (1,053.34 ha). | <p>Comply</p> |

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| | | <ul style="list-style-type: none"> - Land Application Permit: No.503.8/01/KPPT/2012 dated 17 September 2013. - Surface water use permit No.503.30/01/KPPT/2011, dated 5 July 2011. - Pesticide Store permit No.560/386/4.3/ DSTKT. - Izin operational pabrik (Mill operation permit) No.532/T/Industri/2005 <p>Smallholder: Plasma management of Tungkal Ulu conducted the evaluation of laws and regulation compliance each year. Latest updated was on 29 March 2019. During audit, Group manager can demonstrated the document of "Evaluasi Kepatuhan Hukum Kebun Plasma Tungkal Ulu Tahun 2019" which contain the list/legal register' of all applicable laws and regulations; consist of: list of regulation, requirement, evaluation record, compliance status, type of document, no. document, validity, source of document, remark. Some example showing compliance to relevant regulation as follows: <u>KUD Harapan Jaya:</u></p> <ul style="list-style-type: none"> - Akte Pendirian Koperasi- Cooperative Establishment Deed: Akta Pendirian Koperasi KUD Harapan Jaya and endorsement by Departemen Koperasi dan Pembinaan Pengusaha Kecil SK no. 45/BH/KWK.5/VIII/1995 dated 25 August 1995. - SHM- land title certificate: hold by each farmer - TDP (Tanda Daftar Perusahaan Koperasi-Sign of Cooperative Company List): no. 05126400257, dated 6 June 2017 valid until 6 June 2022. - SITU Surat Izin Usaha Perdagangan (SIUP) Kecil- Business Trading License: No. 503/4.2/200/PM-PTSP/2018, dated 2 November 2018. <p><u>KUD Argo Makmur:</u></p> <ul style="list-style-type: none"> - Akte Pendirian Koperasi- Cooperative Establishment Deed: Akta Pendirian Koperasi KUD Argo Makmur and register by Departemen Koperasi dan Pembinaan Pengusaha Kecil SK no. 1102/BH/XV dated 22 August 1994. - SITU Surat Izin Usaha Perdagangan (SIUP) Kecil- Business Trading License: No. 503/A.6.1/35/PMPTSP/2019, Dated 29 January 2019 - TDP (Tanda Daftar Perusahaan Koperasi-Sign of Cooperative Company List): no. 050126400259, dated 31 July 2017 valid until 23 November 2022. | |
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| | | <ul style="list-style-type: none"> - Izin Tempat usaha Kantor KUD Argo Makmur "Keputusan Kepala Dinas Penanaman Modal dan Pelayanan Terpadu Satu Pintu Kab. Tanjung Jabung Barat Nomor: 503/B.8.1/90/PM-PTSP/2019" dated 29 January 2019 - SHM- land title certificate: hold by each farmer. <p><u>KUD Bina Usaha:</u></p> <ul style="list-style-type: none"> - Akte Pendirian Koperasi- Cooperative Establishment Deed: Akta Pendirian Koperasi KUD Bina Usaha and endorsed by Menteri Koperasi dan Pembinaan Pengusaha Kecil SK no. 164/BH/PAD/KWK.5/IV/1996 dated 30 April 1996. - NPWP- taxpayer number: 01.535.599.3-334.000 - SITU Surat Izin Usaha Perdagangan (SIUP) Kecil- Business Trading License: No. 503/A.6.1/35/PMPTSP/2019, Dated 29 January 2019 - TDP (Tanda Daftar Perusahaan Koperasi-Sign of Cooperative Company List): no. 050124200245, dated 13 January 2017 valid until 22 September 2021. - Izin Tempat usaha Kantor KUD Bina Usaha "Keputusan Bupati Tanjung Jabung Barat Nomor: 503.1/433/KPPT/2011" dated 22 September 2011. <p><u>Koperasi Manunggal Jaya:</u></p> <ul style="list-style-type: none"> - Akte Pendirian Koperasi- Cooperative Establishment Deed: Akta Pendirian Koperasi KUD Bina Usaha and endorsed by Menteri Koperasi dan Pembinaan Pengusaha Kecil SK no. 503/89/BH/DISKOPERINDAG dated 28 March 2005. - NPWP- taxpayer number: 31.610.236.7-334.000 - TDP (Tanda Daftar Perusahaan Koperasi-Sign of Cooperative Company List): no. 050126400265, dated 31 July 2017 valid until 30 November 2022. - Izin Tempat usaha Kantor KUD Harapan Jaya "Keputusan Kepala Kantor Pelayanan Perijinan Terpadu Kab. Tanjung Jabung Barat Nomor: 503.6/393/KPPT/2012" dated 30 November 2012. | |
| 2.1.2 | <p>A documented system, which includes written information on legal requirements, shall be maintained.</p> <p>- Minor compliance –</p> | <p>Mill and Estate: The certificate holder has a mechanism to identify and evaluate compliance with applicable laws and regulation. It is documented on procedure "SOP Pemenuhan Peraturan Perundang-undangan dan Perubahannya" (No. SOP; AA-GL-5001.1-RO) dated 5th December 2009). Personnel in charge to manage legal requirements is "HUMAS" officer and Administration Head or "KTU". Set of legal documents are recorded and available in list of national and regional laws.</p> | <p>Not Comply (1761451-201905-N1)</p> |

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| | | <p>There is a documented system registering all relevant legal requirements to which the company must comply, and also there is a document of "Legal Register" latest updated on 29 March 2019, which includes relevant Environmental regulation, Plantation permit, etc. The list would be reviewed once a year by the EHS Department and all relevant department, updated as necessary.</p> <p>Evaluation of compliance for all regulation and other requirement related to environment, health and safety, manpower and land tenure has been performed (presented in "Evaluation of Compliance").</p> <p>The organization has a mechanism to ensure compliance with all applicable laws and regulations compliance through procedure "SOP Pemenuhan Peraturan Perundang-undangan dan Perubahannya" (No. SOP; AA-GL-5001.1-RO) dated 5th December 2009). Personnel in charge to manage legal requirements is "HUMAS" officer and Administration Head or "KTU". Set of legal documents are recorded and available in list of national and regional laws.</p> <p>Minor Non Conformity: PT. IIS – Tungkal Ulu have prepared the list of relevant laws and regulation. However, the certificate holder unable to demonstrate a complete and applicable regulation, as identified in the RSPO P&C 2013, Indonesia National Interpretation, September 2016 – appendix 1. PT. IIS – Tungkal Ulu have not identified and evaluated these applicable regulations:</p> <ul style="list-style-type: none"> • Undang-undang No.80 tahun 1957 tentang Ratifikasi Konvensi ILO No. 100 tahun 1951 tentang Pengupahan yang sama Bagi Pekerja Laki-laki dan Wanita untuk Pekerjaan yang Sama Nilainya; • Undang-undang No.19 tahun 1999 tentang Ratifikasi ILO Convention No.105 tahun 1957 mengenai Penghapusan Kerja Paksa; • Undang-undang No.20 tahun 1999 tentang Ratifikasi ILO Convention No.138 tahun 1973 tentang Batas Usia Minimum; • Undang-undang No.29 tahun 1999 tentang Ratifikasi Konvensi Internasional tentang Penghapusan Segala Bentuk Diskriminasi (Convention on the Elimination of All Forms of Racial Discrimination - CERD); • Undang-undang No.24 tahun 2011 tentang Badan penyelenggara Jaminan Sosial; • Peraturan Menteri Tenaga Kerja No.4 tahun 1987 tentang P2K3 serta Tatacara Penunjukan Ahli K3; | |
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| | | <ul style="list-style-type: none"> • Peraturan Menteri Tenaga Kerja No.7 tahun 2007 tentang Baku Mutu Sumber Tidak Bergerak bagi Ketel Uap; • Peraturan Menteri Tenaga Kerja No.9 tahun 2010 tentang Operator dan Petugas Pesawat Angkat dan Angkut; • Keputusan Menteri Tenaga Kerja No.100 tahun 2004 tentang Ketentuan Pelaksanaan Perjanjian Kerja Waktu Tertentu (PKWT); • PP No. 101 tahun 2014 tentang Pengelolaan Limbah B3 • Peraturan Menteri Lingkungan Hidup Dan Kehutanan Republik Indonesia Nomor P.20/MENLHK/SETJEN/KUM.1/6/2018 Tentang Jenis Tumbuhan Dan Satwa Yang Dilindungi <p>Smallholder: The organization has a mechanism to ensure compliance with all applicable laws and regulations compliance through procedure "SOP Pemenuhan Peraturan Perundang-undangan dan Perubahannya" (No. SOP; AA-GL-5001.1-RO) dated 5th December 2009).</p> <p>Plasma/Smallholder Manager has a responsibility to ensure the compliance of all smallholder member and organization against applicable laws and regulations. Group manager and ICS conducted the evaluation of laws and regulation compliance each year. Latest updated on 29 March 2019. During audit, Plasma manager can demonstrated the document "Evaluasi Kepatuhan Hukum Kebun Plasma Tungkal Ulu 2019".</p> | |
| 2.1.3 | <p>A mechanism for ensuring compliance shall be implemented. - Minor compliance –</p> | <p>Mill and Estate: The organization has a mechanism to ensure compliance with all applicable laws and regulations compliance through procedure "SOP Pemenuhan Peraturan Perundang-undangan dan Perubahannya" (No. SOP; AA-GL-5001.1-RO) dated 5th December 2009).</p> <p>There is a rigorous internal audit process which includes a review of laws and their compliance. There is no evidence of critical legal non compliance as a result of internal audit. Each department has to demonstrate evidence of compliance and/or effort in complying with these legal/regulatory requirements. This includes manpower regulation fulfilment, environmental reporting, health and safety reporting and other legal/regulatory requirements. Evidence of documented mechanism on the compliance with relevant regulation was sighted in terms of Legal Requirements and Evaluation</p> | Comply |

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| | | <p>Compliance "Evaluasi Kepatuhan Hukum", It was verified that list of legal requirement is updated regularly, latest updated on 29 March 2019.</p> <p>HUMAS" officer and Administration Head or "KTU" has the responsibility to update the list of applicable laws and regulations using internet access via relevant webmail address and/or consultation with the related institutions. The mechanism is also include for subcontractor. Company has the mechanism to ensure the contractor/supplier compliance to the relevant regulation before approved the contractor/supplier as a partner of company. Recorded on form "Evaluation of Legal and Other Requirements Compliance".</p> <p>Smallholder: KUD/Cooperatives has assigned the personal in charge who responsible for monitoring the regulation compliance and updating the regulation compliance evaluation. PIC for regulation compliance monitoring has determined based on:</p> <ul style="list-style-type: none"> - "Surat Keputusan Pengurus Koperasi Manunggal Jaya Desa Adipura , Kecamatan Merlung Nomor: 02/Kpts/KUD-KMJ/II/2019 Tentang Penunjukan/Pengangkatan Petugas Pengurus Evaluasi kepatuhan Hukum Koperasi Manunggal Jaya" dated 12 February 2019, PIC assigned Mr. Sumali. - "Surat Keputusan Pengurus KUD Harapan Jaya Desa Kemang Manis, Kecamatan Muara Papalik Nomor: 02/Kpts/KUD-HJ/II/2019 Tentang Penunjukan/Pengangkatan Petugas Pengurus Evaluasi kepatuhan Hukum KUD Harapan Jaya" dated 22 January 2019, PIC assigned Mr. Nasrul Jamal. - "Surat Keputusan Pengurus KUD Bina Usaha Desa Cinta Damai, Kecamatan Renah Mendaluh Nomor: 02/Kpts/KUD-BU/II/2019 Tentang Penunjukan/Pengangkatan Petugas Pengurus Evaluasi kepatuhan Hukum KUD Bina Usaha" dated 21 January 2019, PIC assigned Ms. Hanifah. <p>"Surat Keputusan Pengurus KUD Argo Makmur Desa Bukit Indah, Kecamatan Muara Papalik Nomor: 02/Kpts/KUD-AM/II/2019 Tentang Penunjukan/Pengangkatan Petugas Pengurus Evaluasi kepatuhan Hukum KUD Argo Makmur" dated 21 January 2019, PIC assigned Mr. Kalmi.</p> | |
| 2.1.4 | <p>A system for tracking any changes in the law shall be available and implemented.</p> <p>- Minor compliance –</p> | <p>Mill and Estate: Legal requirement-evaluation and fulfillment mechanism regulated under "SOP Pemenuhan Peraturan Perundang-undangan dan Perubahannya" (No. SOP; AA-GL-5001.1-RO) dated 5th</p> | Comply |

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| | | <p>December 2009. The procedure explains the stages for evaluation applicable legal requirements, person in charge for evaluation and ensures implementation of such requirement.</p> <p>The company receives information of changes in regulations from a number of sources. This includes company lawyers, Manpower office, Agriculture and Plantation service and Forestry service and others. This is then circulated and cascaded to relevant department within the company, which might affected by these changes.</p> <p>HUMAS" officer and Administration Head or "KTU" has the responsibility to update the list of applicable laws and regulations using internet access via relevant webmail address and/or consultation with the related institutions.</p> <p>Smallholder: Smallholder manager will inform the scheme smallholders (cooperative) if there is any a change or amendment in laws and regulations. Scheme manager conduct meetings with the cooperative members to ensure compliance. Latest meeting with smallholder scheme conducted on January 2019 attended by KUD management, WKAK (inter-group communication forum), farmers group and farmer board. Evidence of meeting can be demonstrated during audit.</p> <p>KUD/Cooperatives has assigned the personal in charge who responsible for monitoring the regulation compliance and updating the regulation compliance evaluation.</p> | |
| <p>Criterion 2.2 The right to use the land is demonstrated, and is not legitimately contested by local people who can demonstrate that they have legal, customary or user rights.</p> | | | |
| 2.2.1 | <p>Documents showing legal ownership or lease, history of land tenure ownership/control, and the actual legal use of the land shall be available.</p> <p>- Major compliance -</p> | <p>PT Inti Indosawit Subur – Tungkal Ulu POM has shown the document of legal ownership or lease. Land title (HGU) of Tungkal Ulu Estate consist of 11 certificate with total permitted area is 4,556.36 Ha, in detail:</p> <ol style="list-style-type: none"> 1. HGU No. 01, issued 31 October 1992, size: 3,503.02 Ha, expiry 31 December 2027. SK HGU No. 13/HGU/1992, 15 September 1992. 2. HGU No. 00038, issued 10 July 2014, size: 68.74 Ha, expiry 16 May 2049. SK HGU No. 82/HGU/BPN RI/2014, 16 May 2014. 3. HGU No. 00037, issued 10 July 2014, size: 5.20 Ha, expiry 16 May 2049. SK HGU No. 82/HGU/BPN RI/2014, 16 May 2014. | Comply |

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| | | <p>4. HGU No. 00036, issued 10 July 2014, size: 400.06 Ha, expiry 16 May 2049. SK HGU No. 82/HGU/BPN RI/2014, 16 May 2014.</p> <p>5. HGU No. 00045, issued 10 July 2014, size: 3.72 Ha, expiry 16 May 2049. SK HGU No. 82/HGU/BPN RI/2014, 16 May 2014.</p> <p>6. HGU No. 00043, issued 10 July 2014, size: 4.41 Ha, expiry 16 May 2049. SK HGU No. 82/HGU/BPN RI/2014, 16 May 2014.</p> <p>7. HGU No. 00044, issued 10 July 2014, size: 480.34 Ha, expiry 16 May 2049. SK HGU No. 82/HGU/BPN RI/2014, 16 May 2014.</p> <p>8. HGU No. 00042, issued 10 July 2014, size: 10.98 Ha, expiry 16 May 2049. SK HGU No. 82/HGU/BPN RI/2014, 16 May 2014.</p> <p>9. HGU No. 00040, issued 10 July 2014, size: 40.44 Ha, expiry 16 May 2049. SK HGU No. 82/HGU/BPN RI/2014, 16 May 2014.</p> <p>10. HGU No. 00039, issued 10 July 2014, size: 30.89 Ha, expiry 16 May 2049. SK HGU No. 82/HGU/BPN RI/2014, 16 May 2014.</p> <p>11. HGU No. 00041, issued 10 July 2014, size: 8.56 Ha, expiry 16 May 2049. SK HGU No. 82/HGU/BPN RI/2014, 16 May 2014.</p> <p>Operational Permit:</p> <ol style="list-style-type: none"> 1. Plantation permit SPUP No: 187/Mentanhut/VII/2000, dated 3rd November 2000, the permit area allocated to area 4,759.20 Ha (SK HGU No. 13/HGU/1992 and SK HGU 14/HGU/1992). This permit covered Muara Bulian Estate, another estate of PT Inti Indosawit Subur in different regency. 2. In 2008, Tungkal Ulu Estate also has Plantation Permit "IUP" Nomor: 625 Tahun 2008, dated 26 September 2008 with permitted area ± 1,111 Ha. This permitted area allocated to HGU area 1,053.34 Ha (10 certificate HGU issued on 2014). <p>Smallholders: The copies of legal ownership right (Sertifikat Hak Milik) are documented and available in Kantor Plasma. Land ownership status of smallholder scheme has granted by government program namely Transmigration Program "PIR-TRANS" since 1992 – 1995.</p> | |
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| KUD Bina Usaha SP - 1: | | | | |
|------------------------|------|----------------------|----------------------|------------------------------|
| Block | Plot | Prev. ownership | Current ownership | Certificate No. |
| 4 | 2376 | SUGIYANTO | PARJIEM | SHM No 210, dated 28/05/1996 |
| | 2360 | SUHARTOYO | SUHARTOYO | SHM No 203, dated 28/05/1996 |
| | 2358 | M.TAMRIN | ROSDIANA | SHM No 94, dated 28/05/1996 |
| | 2363 | BURHANUDIN SARUMPAET | BURHANUDIN SARUMPAET | SHM No 107, dated 28/05/1996 |
| 6 | 2430 | MAT RAI | ISWANTO | SHM No 22, dated 28/05/1996 |
| | 2431 | KATIM | MUJIO | SHM No 112, dated 28/05/1996 |
| | 2435 | SUKARNEN | ISENEN | SHM No 194, dated 28/05/1996 |
| | 2447 | ASWARDI | SAMSUDIN | SHM No 87, dated 28/05/1996 |
| 7 | 2484 | SULARSO WARDOYO | HARIYADI | SHM No 189, dated 28/05/1996 |
| | 2487 | MARWAN LOWER | SAYRU ROSDIANA / | SHM No 263, dated 28/05/1996 |
| | 2460 | KARSITA | FAUZI | SHM No 222, dated 28/05/1996 |
| | 2442 | CARMIN | ISRONI | SHM No 245, dated 28/05/1996 |
| 9 | 2540 | SARCA | ADNAN | SHM No 77, dated 28/05/1996 |
| | 2542 | SUNARDI | SUNARDI | SHM No 265, dated 28/05/1996 |
| | 2553 | MAT KARDI | SUMARNO | SHM No 127, dated 28/05/1996 |
| | 2554 | MUH. EDI.S | BUSRI | SHM No 122, dated 28/05/1996 |
| 13 | 2626 | DARMI | SARSIH | SHM No 515, dated 26/04/1997 |
| | 2625 | SULAIMAN | SULAIMAN | SHM No 518, dated 26/04/1997 |

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|--------------------------|-------------|-------------------------|--------------------------|------------------------------|
| | 2611 | KHAIRONI | BAMBANG PRIYONO | SHM No 504, dated 26/04/1997 |
| | 2343 | IMAM. S | TUMIRAH | SHM No 508, dated 26/04/1997 |
| KUD Manunggal Jaya – SP6 | | | | |
| Block | Plot | Prev. ownership | Current ownership | Certificate No. |
| 16 | 1898 | PAIMIN | SUBANDI. 1 | SHM No 818, dated 28/05/1996 |
| | 1840 | CHENDI DESTRIAN | SULARNO | SHM No 798, dated 28/05/1996 |
| | 1932 | MARSONO | MARSONO | SHM No 821, dated 28/05/1996 |
| | 1904 | SUNARYO | SUNARYO | SHM No 810, dated 28/05/1996 |
| | 1858 | KALAM | KALAM | SHM No 814, dated 28/05/1996 |
| 18 | 2143 | JOHANES R. SUPRIYADI | JOHANES R. SUPRIYADI | SHM No 829, dated 28/05/1996 |
| | 2216 | MUHTAR | MUHTAR | SHM No 865, dated 28/05/1996 |
| | 2218 | TUMIN | TUMIN | SHM No 837, dated 28/05/1996 |
| | 2210 | BERAT ALYANTO | BERAT ALYANTO | SHM No 839, dated 28/05/1996 |
| | 2199 | PARMAN | PARMAN | SHM No 836, dated 28/05/1996 |
| 19 | 2165 | KASMIN | KASMIN | SHM No 861, dated 28/05/1996 |
| | 2169 | SUID | SUID | SHM No 916, dated 28/05/1996 |
| | 2129 | RUBIYO | RUBIYO | SHM No 866, dated 28/05/1996 |
| | 2145 | SUMADI | SUBALI | SHM No 874, dated 28/05/1996 |
| | 20 | 2156 | JUREMI | HADI PRIYATNO |
| 2212 | | WAHYUDI | SUTARNO | SHM No 894, dated 28/05/1996 |
| 2184 | | SAPON | SUMALI | SHM No 897, dated 28/05/1996 |

| | 2213 | SUHARDIMAN | SLAMET | SHM No 893, dated 28/05/1996 |
|-----------------------|------|-----------------|-------------------|-------------------------------|
| KUD Argo Makmur – SP8 | | | | |
| Block | Plot | Prev. ownership | Current ownership | Certificate No. |
| 8 | 4223 | HASIM | SARMO | SHM No 834, dated 13/02/1996 |
| | 4274 | HADI | HADI | SHM No 832, dated 26/04/1997 |
| | 4275 | MARIDUN | SANTURI | SHM No 814, dated 26/04/1997 |
| | 4222 | LASHARDI | JIMI MARTONO | SHM No 837, dated 26/04/1997 |
| 16 | 3957 | AMIRJAN | MAKMUR | SHM No 553, dated 26/04/1997 |
| | 3953 | AHMAD KARIM | TUKIMIN | SHM No 653, dated 26/04/1997 |
| | 4040 | A. SETIAWAN | MATNI | SHM No 664, dated 26/04/1997 |
| | 4039 | BUSTAMAR | KAMSINAH | SHM No 662, dated 26/04/1997 |
| 19 | 4197 | TUGIN | TONGIN | SHM No 900, dated 26/04/1997 |
| | 4238 | SYAFRIAL.S | KASIMAN | SHM No 871, dated 26/04/1997 |
| | 4199 | SUPRAYOGI | SUPRAYOGI | SHM No 908, dated 26/04/1997 |
| | 4239 | SUMADI | SUMADI | SHM No 695, dated 26/04/1997 |
| 22 | 4908 | ZUKIPLI | BASORI | SHM No 1015, dated 11/12/1997 |
| | 4971 | WAHYUDI | SULINO | SHM No 963, dated 11/12/1997 |
| | 4943 | WAHYU SUDRAJAT | WAHYU SUDRAJAT | SHM No 1033, dated 11/12/1997 |
| | 4938 | SYAFRI HUSIN | A. DULHAMID | SHM No 1042, dated 11/12/1997 |
| 24 | 4901 | SUKIMAN | SURIPTO | SHM No 1057, dated 11/12/1997 |
| | 4919 | SARIMAN | SARIMAN | SHM No 1055, dated 11/12/1997 |
| | 4885 | SAMSI | SAMSI | SHM No 1116, dated 11/12/1997 |
| | 4884 | SAMIJAN | SUWARSONO | SHM No 1114, dated 11/12/1997 |

| SP Harapan Jaya – SP9 | | | | |
|-----------------------|------|-----------------|----------------------|-------------------------------|
| Block | Plot | Prev. ownership | Current ownership | Certificate No. |
| 2 | 4134 | ISKANDAR | SOHIR | SHM No 560, dated 26/04/1997 |
| | 4184 | SUMARYONO | SUMARYONO | SHM No 530, dated 26/04/1997 |
| | 4190 | TARMUJI | H. TARYO | SHM No 534, dated 26/04/1997 |
| | 4193 | SUKRIYONO | SUKRIYONO | SHM No 550, dated 26/04/1997 |
| 7 | 4699 | PRIYONO | KARMANTO | SHM No 818, dated 11/12/1997 |
| | 4708 | KAMSIDI | KASMIDI | SHM No 400, dated 26/04/1997 |
| | 4798 | SUWADI | SITI MASNIAH | SHM No 391, dated 26/04/1997 |
| | 4701 | JUWARI | ASUP SUTAJI | SHM No 374, dated 26/04/1997 |
| 12 | 4490 | REPASONER | ZAINUL ARIFIN SITEPU | SHM No 303, dated 26/04/1997 |
| | 4485 | SUKARMO | H. MARWOTO | SHM No 293, dated 26/04/1997 |
| | 4831 | TURMU .I. | PAJAR IKA NURHIDAYAT | SHM No 310, dated 26/04/1997 |
| | 4830 | ZAKARIA. M | WAHMAN | SHM No 525, dated 26/04/1997 |
| 18 | 4687 | NGUMPI'I | SUMARJIANTO | SHM No 943, dated 11/12/1997 |
| | 4686 | NYAMAN | PAJAR IKA NURHIDAYAT | SHM No 954, dated 26/04/1997 |
| | 4705 | SAGILAN | SAGILAN | SHM No 876, dated 11/12/1997 |
| | 4859 | TUGIMAN | MUALIMIN | SHM No 440, dated 26/04/1997 |
| 23 | 4403 | SUMEDI | PONIMAN | SHM No 1040, dated 11/12/1997 |
| | 4470 | MUJIONO | MUJIONO | SHM No 974, dated 11/12/1997 |
| | 4412 | A.LATIF | SUBAKHIR | SHM No 1032, dated 11/12/1997 |

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|-------|---|--|---------|---------|-------------------------------|--------|
| | | 4408 | MUGIYAR | MUGIYAR | SHM No 1016, dated 11/12/1997 | |
| 2.2.2 | <p>Legal boundaries are demonstrated clearly and maintained.</p> <p>- Minor compliance -</p> | <p>The certificate holder has a map of legal boundaries sources from 11 Land Title or "HGU". Monitoring of boundary poles conducted periodically every 6 months. Auditor verifies of sample boundary poles using UTM Geo Map application version 1.9.8 to ensure accuracy of coordinates position.</p> <p>"Laporan pemeriksaan dan perawatan patok batas PT. IIS (002/LAP/KTU/SSL/02.3/ XII/2018)", monitoring period 11-13 December 2018. There are 85 boundary pegs identified and monitored with condition is clearly demarcated. Sample of field visit on boundary pegs: BPN 60; 62; 64; 68; 69. All pegs are clearly visible and maintained.</p> <p>Smallholders: Sample of boundary poles at smallholders plot:</p> <ul style="list-style-type: none"> - KUD Bina Usaha: Plot #2431; #2420; #2447; #2435 - KUD Manunggal Jaya: Plot #2149; #2195; #2210. - KUD Argo Makmur: Plot #4943; #4938; #4971; #4908. - KUD Harapan Jaya: Plot #4485; #4831; #4490; #4830 <p>During field observation at smallholders sample plot, legal boundaries are visible and maintained.</p> | | | | Comply |
| 2.2.3 | <p>In the event that there is a dispute or a dispute has occurred, adequate evidence of legitimate acquisition and compensation or compensation settlement process through conflict resolution which has been received through Free, Prior and Informed Consent by all related parties shall be provided.</p> <p>- Minor compliance -</p> | <p>According to stakeholder's consultation there is no land disputes within the estate area. Mr. Panca (Plantation Agency of Jambi Province) which informed that since the company developed the plantation in 1991-1992, there is no dispute or significant conflict over that area.</p> <p>Based on document review and interview with local community in Merlung Village. There was an occupied area ± 9.8 Ha located in Block C10 Afdeling 3 (referred to HGU Certificate No. 01/1992) where the landowner is a local villager of Merlung. Land condition dominated with Durian trees and secondary vegetation. This area is not released nor compensated by the company due to there area categorized inherited land from his grandfather.</p> <p>Smallholders:</p> | | | | Comply |

| | | | |
|-------|--|---|--------|
| | | <p>During interview with individual farmers/smallholders at sample plot taken, there is no land disputes since the development began in 1991/1992.</p> <p>Land ownership status of smallholder scheme is granted by government program namely Transmigration Program since 1992 – 1995 (PIR - TRANS)</p> | |
| 2.2.4 | <p>There shall be an absence of significant land conflict, unless requirements for acceptable conflict resolution processes (see Criteria 6.3 and 6.4) are implemented and accepted by the parties involved.</p> <p>- Major compliance –</p> | <p>According to stakeholder’s consultation there is no land disputes within the estate area. Mr. Panca (Plantation Agency of Jambi Provice) which informed that since the company developed the plantation in 1991-1992, there is no dispute or significant conflict over that area.</p> <p>Based on document review and interview with local community in Merlung Village. There was an occupied area ± 9.8 Ha located in Block C10 Afdeling 3 (referred to HGU Certificate No. 01/1992) where the landowner is a local villager of Merlung. Land condition dominated with Durian trees and secondary vegetation. This area is not released nor compensated by the company due to there area categorized inherited land from his grandfather.</p> <p>Smallholders: During interview with individual farmers/smallholders at sample plot taken, there is no land disputes since the development began in 1991/1992.</p> <p>Land ownership status of smallholder scheme is granted by government program namely Transmigration Program since 1992 – 1995 (PIR - TRANS)</p> | Comply |
| 2.2.5 | <p>For any conflict or dispute over the land, the evidence of the extent of disputed area is mapped out in a participatory way with involvement of affected parties (including neighboring communities and local government where applicable), shall be available.</p> <p>- Minor compliance –</p> | <p>According to stakeholder’s consultation there is no land disputes within the estate area. Mr. Panca (Plantation Agency of Jambi Provice) which informed that since the company developed the plantation in 1991-1992, there is no dispute or significant conflict over that area.</p> <p>Based on document review and interview with local community in Merlung Village. There was an occupied area ± 9.8 Ha located in Block C10 Afdeling 3 (referred to HGU Certificate No. 01/1992) where the landowner is a local villager of Merlung. Land condition dominated with Durian trees and secondary vegetation. This area is not released nor compensated by the company due to there area categorized inherited land from his grandfather.</p> <p>Smallholders:</p> | Comply |

| | | | |
|--|---|--|--------|
| | | <p>During interview with individual farmers/smallholders at sample plot taken, there is no land disputes since the development began in 1991/1992.</p> <p>Land ownership status of smallholder scheme is granted by government program namely Transmigration Program since 1992 – 1995 (PIR - TRANS)</p> | |
| 2.2.6 | <p>To avoid escalation of conflict, there shall be no evidence that palm oil operations have instigated violence in maintaining peace and order in their current and/or planned operations.</p> <p>- Major compliance –</p> | <p>According to stakeholder’s consultation there is no land disputes within the estate area. Mr. Panca (Plantation Agency in Jambi Province) which informed that since the company developed the plantation in 1991-1992, there is no dispute or significant conflict over that area.</p> <p>Based on document review and interview with local community in Merlung Village. There was an occupied area ± 9.8 Ha located in Block C10 Afdeling 3 (referred to HGU Certificate No. 01/1992) where the landowner is a local villager of Merlung. Land condition dominated with Durian trees and secondary vegetation. This area is not released nor compensated by the company due to there area categorized inherited land from his grandfather.</p> <p>Smallholders: During interview with individual farmers/smallholders at sample plot taken, there is no land disputes since the development began in 1991/1992.</p> <p>Land ownership status of smallholder scheme is granted by government program namely Transmigration Program since 1992 – 1995 (PIR - TRANS)</p> | Comply |
| <p>Criterion 2.3 Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.</p> | | | |
| 2.3.1 | <p>Maps with appropriate scale showing the extent of recognized legal, customary or user rights (Criteria 2.2, 7.5 and 7.6) shall be developed through participatory mapping involving affected parties (including neighboring communities where applicable, and relevant authorities).</p> | <p>Use of the land for oil palm in Tungkal Ulu based on land use title or HGU with total area is 4,556.36 Ha, which consist of 11 HGU certificate. All this area has mapped on “Peta Kebun Tungkal Ulu, Scale 1:35,000”. FPIC mechanism and process is available in Land Dispute Resolution procedure (SOP AA-GL5003.1-R1 “Penanganan Konflik Lahan”, dated 22 August 2011). FPIC mechanism is available on the flowchart and part of the process of conflict resolution.</p> <p>Smallholders: There is no changes of smallholders map. All the smallholders plot is permanent owned by the farmers. These lands is given from government as Transmigration Program since 1980’s and</p> | Comply |

| | | | |
|-------|---|--|--------|
| | - Major compliance - | recognized as legal ownership. Land ownership certificate or "SHM" of all smallholders plot are origin from government land. Each certificate has an appropriate map with measurement by National Land Department or BPN. Size of smallholders plot average is 2 Hectare. | |
| 2.3.2 | <p>Copies of negotiated agreements including the process of free, prior and informed consent (FPIC) (Criteria 2.2, 7.5 and 7.6) shall be available and these include:</p> <ul style="list-style-type: none"> a) Evidence of consultation b) Statement of transfer of rights c) Evidence of compensation <p>See specific guidance 2.3.2</p> <p>- Minor compliance -</p> | <p>The certificate holder (company) has land use rights "HGU" for its area. There is no more land compensation made after the company obtained the land use title. FPIC implemented prior to obtain land use rights. There in no new planting within the company area.</p> <p>Smallholders: Based on interview with smallholder's cooperative head, it was informed that if any transfer of ownership rights between farmer's it should be report to cooperative and village head by using documented paper "Surat Keterangan Pindahan Kepemilikan" in Bahasa. Therefore, it will be updated by cooperative for status of membership. This mechanism is consider as FPIC process between smallholders.</p> | Comply |
| 2.3.3 | <p>Relevant information shall be available in appropriate forms and languages, including analysis of impacts, proposed benefit sharing, and legal arrangements.</p> <p>- Minor compliance -</p> | <p>The certificate holder (company) has land use rights "HGU" for its area. There is no more land compensation made after the company obtained the land use title. FPIC implemented prior to obtain land use rights. There in no new planting within the company area.</p> <p>Smallholders: Based on interview with smallholder's cooperative head, it was informed that if any transfer of ownership rights between farmer's it should be report to cooperative and village head by using documented paper "Surat Keterangan Pindahan Kepemilikan" in Bahasa. Therefore, it will be updated by cooperative for status of membership. This mechanism is consider as FPIC process between smallholders.</p> | Comply |
| 2.3.4 | <p>Evidence shall be available to show that communities are represented through institutions or representatives of their own choosing, including legal counsel.</p> <p>- Major compliance -</p> | <p>The certificate holder (company) has land use rights "HGU" for its area. There is no more land compensation made after the company obtained the land use title. FPIC implemented prior to obtain land use rights. There in no new planting within the company area.</p> <p>Smallholders:</p> | Comply |

| | | <p>Based on interview with smallholder’s cooperative head, it was informed that if any transfer of ownership rights between farmer’s it should be report to cooperative and village head by using documented paper “Surat Keterangan Pemindahan Kepemilikan” in Bahasa. Therefore, it will be updated by cooperative for status of membership. This mechanism is consider as FPIC process between smallholders.</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--|--|---|-------------|-------------|--------------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|------|-----|------|-------|-------|-------|---|---|---|---|------|-------|------|-------|-------|-------|-------|-------|-------|---|------|----|------|-------|-------|-------|-------|-------|-------|-------|------|---|------|-------|-------|-------|-------|-------|-------|-------|------|-----|------|-------|------|-------|-------|-------|-------|-------|---------------|
| <p>Principle 3: Commitment to long-term economic and financial viability</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>Criterion 3.1</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>There is an implemented management plan that aims to achieve long-term economic and financial viability.</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>3.1.1</p> | <p>A documented management plan, a minimum of three years shall be available, including, where appropriate, plan for scheme smallholders.</p> <p>- Major compliance-</p> | <p>Mill, Estate & Smallholder</p> <p>The company has committed to economic and financial sustainability, as on documented working plan of Financial Budget Plan “Rencana Kerja Tahun 2019 - 2024”. The company has set up a business management plan for the next 5 years and the forecast have been well documented in the document “Proyeksi Produk Sustainable & Non Sustainable PT Inti Indosawit Subur – Tungkal Ulu POM period 2019 - 2024. Management plan was set up including independent FFB suppliers. Its management plan include:</p> <ol style="list-style-type: none"> 1. FFB Production projection 2019 – 2024 2. CPO, PK, production projection 2019 – 2024 3. OER, KER projection 2019 – 2024 4. Estate Cost Estimation: Upkeep cost, manuring cost, pest and disease management cost, pruning cost, census cost, terrace maintenance cost, road and bridge maintenance cost, harvesting cost. 5. Mill Cost, KCP Cost, Selling cost, Bulking cost and Tax portion actual 2018 and projection 2019 – 2024 6. Net Profit/Loss <p>Estimated Yield per YOP:</p> <table border="1" data-bbox="757 1173 1827 1390"> <thead> <tr> <th>YOP</th> <th>Ha</th> <th>Act up to Apr 2019</th> <th>Budget 2019</th> <th>Target 2019</th> <th>Target 2020</th> <th>Target 2021</th> <th>Target 2022</th> <th>Target 2023</th> <th>Target 2024</th> </tr> </thead> <tbody> <tr> <td>1991</td> <td>692</td> <td>9.15</td> <td>23.38</td> <td>28.77</td> <td>24.45</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>1993</td> <td>1,437</td> <td>6.28</td> <td>21.50</td> <td>28.25</td> <td>24.01</td> <td>24.97</td> <td>21.23</td> <td>18.04</td> <td>-</td> </tr> <tr> <td>2003</td> <td>43</td> <td>7.30</td> <td>25.00</td> <td>30.25</td> <td>25.71</td> <td>26.74</td> <td>22.73</td> <td>19.32</td> <td>16.42</td> </tr> <tr> <td>2009</td> <td>7</td> <td>8.18</td> <td>28.00</td> <td>40.32</td> <td>34.27</td> <td>37.70</td> <td>32.04</td> <td>27.24</td> <td>23.15</td> </tr> <tr> <td>2016</td> <td>291</td> <td>1.60</td> <td>13.72</td> <td>9.00</td> <td>18.00</td> <td>25.00</td> <td>31.00</td> <td>31.00</td> <td>31.00</td> </tr> </tbody> </table> | YOP | Ha | Act up to Apr 2019 | Budget 2019 | Target 2019 | Target 2020 | Target 2021 | Target 2022 | Target 2023 | Target 2024 | 1991 | 692 | 9.15 | 23.38 | 28.77 | 24.45 | - | - | - | - | 1993 | 1,437 | 6.28 | 21.50 | 28.25 | 24.01 | 24.97 | 21.23 | 18.04 | - | 2003 | 43 | 7.30 | 25.00 | 30.25 | 25.71 | 26.74 | 22.73 | 19.32 | 16.42 | 2009 | 7 | 8.18 | 28.00 | 40.32 | 34.27 | 37.70 | 32.04 | 27.24 | 23.15 | 2016 | 291 | 1.60 | 13.72 | 9.00 | 18.00 | 25.00 | 31.00 | 31.00 | 31.00 | <p>Comply</p> |
| YOP | Ha | Act up to Apr 2019 | Budget 2019 | Target 2019 | Target 2020 | Target 2021 | Target 2022 | Target 2023 | Target 2024 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1991 | 692 | 9.15 | 23.38 | 28.77 | 24.45 | - | - | - | - | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1993 | 1,437 | 6.28 | 21.50 | 28.25 | 24.01 | 24.97 | 21.23 | 18.04 | - | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2003 | 43 | 7.30 | 25.00 | 30.25 | 25.71 | 26.74 | 22.73 | 19.32 | 16.42 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2009 | 7 | 8.18 | 28.00 | 40.32 | 34.27 | 37.70 | 32.04 | 27.24 | 23.15 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2016 | 291 | 1.60 | 13.72 | 9.00 | 18.00 | 25.00 | 31.00 | 31.00 | 31.00 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| | | | | | | | | |
|---------|------|-------|-------|-------|-------|-------|-------|-------|
| 2017 | - | - | - | 9.00 | 18.00 | 25.00 | 31.00 | 31.00 |
| 2018 | - | - | - | - | 9.00 | 18.00 | 25.00 | 31.00 |
| 2019 | - | - | - | - | - | 9.00 | 18.00 | 25.00 |
| 2020 | - | - | - | - | - | - | 9.00 | 18.00 |
| Average | 6.18 | 19.58 | 22.76 | 21.07 | 18.92 | 18.75 | 18.84 | 17.56 |

Estimated Production per Year for Tungkal Ulu Estate:

| Description | | 2019 | 2020 | 2021 | 2022 | 2023 | 2024 |
|-------------|--------------------|---------|---------|---------|---------|---------|---------|
| FFB | Tungkal Ulu Estate | 154,699 | 150,844 | 182,362 | 193,808 | 208,187 | 226,011 |
| CPO | Tungkal Ulu Estate | 36,586 | 35,825 | 43,311 | 44,673 | 47,987 | 52,096 |
| PK | Tungkal Ulu Estate | 8,199 | 7,995 | 9,665 | 10,272 | 11,034 | 11,979 |
| OER | Tungkal Ulu Estate | 23.65 | 23.75 | 23.75 | 23.05 | 23.05 | 23.05 |
| KER | Tungkal Ulu Estate | 5.30 | 5.30 | 5.30 | 5.30 | 5.30 | 5.30 |

Sample of Estimated Production per Year for Plasma Tungkal Ulu:

| Sample | Ha | Estimated Production (Ton) | | | |
|-------------------------|-------|----------------------------|--------|--------|--------|
| | | 2019 | 2020 | 2021 | 2022 |
| KUD Bina Usaha | 910 | 12,339 | 11,722 | 11,135 | 10,579 |
| Koperasi Manunggal Jaya | 208 | 3,595 | 3,415 | 3,245 | 3,082 |
| KUD Argo Makmur | 1,130 | 20,699 | 19,664 | 18,681 | 17,747 |
| KUD Harapan Jaya | 1,130 | 21,007 | 19,957 | 18,959 | 18,011 |

Financial Balance Audit Results of PT Inti Indosawit Subur – Tungkal Ulu has been carried out by Registered Public Accountants, Satrio Bing Eny & Partners (License number 89/KM.1/2017) based on letter No.090/10/18/GA/YT dated 3 Oktober 2018. The audit is carried out on the company's financial statements prepared in accordance with the Financial Accounting Standards in Indonesia, which consists of statements of financial position on 31 December 2018, and statements of

| | | comprehensive income, statement of changes in equity, and cash flow statements for the year ended. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--|--|--|------|-----------|------------------|------|------|------|------|-----|-----|------|-----|-----|------|-----|-----|------|-----|---|------|-----|---|------|-----|---|------|-----|---|------|-----|---|-------|-------|-------|--------|------|------|------|------|------|------|------|------|------|----------------|-----|-----|----|---|---|---|---|---|---|-------------------------|---|---|---|-----|---|---|---|---|---|-----------------|---|---|---|-----|-----|-----|-----|---|---|------------------|---|---|---|---|-----|-----|-----|---|-----|--------|
| 3.1.2 | <p>An annual replanting program projected for a minimum of five years (but longer where necessary to reflect the management of fragile soils, see Criterion 4.3), with yearly review, shall be available.</p> <p>- Minor compliance-</p> | <p>Estate: Annual replanting has been prepared by Management, implemented by Tungkal Ulu Estate. Yearly review has been performed by Tungkal Ulu Estate. Replanting program and realization are as follows:</p> <table border="1" data-bbox="757 587 1366 992"> <thead> <tr> <th>Year</th> <th>Plan (Ha)</th> <th>Realization (Ha)</th> </tr> </thead> <tbody> <tr><td>2016</td><td>307</td><td>291</td></tr> <tr><td>2017</td><td>607</td><td>586</td></tr> <tr><td>2018</td><td>636</td><td>633</td></tr> <tr><td>2019</td><td>667</td><td>651</td></tr> <tr><td>2020</td><td>609</td><td>-</td></tr> <tr><td>2021</td><td>587</td><td>-</td></tr> <tr><td>2022</td><td>377</td><td>-</td></tr> <tr><td>2023</td><td>583</td><td>-</td></tr> <tr><td>2024</td><td>400</td><td>-</td></tr> <tr><td>Total</td><td>4,789</td><td>2,161</td></tr> </tbody> </table> <p>Scheme Smallholder: Kebun Plasma Tungkal Ulu has developed Replanting program based on year of planting. Below are replanting program for sampled KUD:</p> <table border="1" data-bbox="757 1120 1818 1273"> <thead> <tr> <th>Sample</th> <th>2020</th> <th>2021</th> <th>2022</th> <th>2023</th> <th>2024</th> <th>2025</th> <th>2026</th> <th>2027</th> <th>2028</th> </tr> </thead> <tbody> <tr><td>KUD Bina Usaha</td><td>450</td><td>450</td><td>10</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td></tr> <tr><td>Koperasi Manunggal Jaya</td><td>-</td><td>-</td><td>-</td><td>208</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td></tr> <tr><td>KUD Argo Makmur</td><td>-</td><td>-</td><td>-</td><td>260</td><td>220</td><td>410</td><td>278</td><td>-</td><td>-</td></tr> <tr><td>KUD Harapan Jaya</td><td>-</td><td>-</td><td>-</td><td>-</td><td>180</td><td>390</td><td>200</td><td>-</td><td>360</td></tr> </tbody> </table> | Year | Plan (Ha) | Realization (Ha) | 2016 | 307 | 291 | 2017 | 607 | 586 | 2018 | 636 | 633 | 2019 | 667 | 651 | 2020 | 609 | - | 2021 | 587 | - | 2022 | 377 | - | 2023 | 583 | - | 2024 | 400 | - | Total | 4,789 | 2,161 | Sample | 2020 | 2021 | 2022 | 2023 | 2024 | 2025 | 2026 | 2027 | 2028 | KUD Bina Usaha | 450 | 450 | 10 | - | - | - | - | - | - | Koperasi Manunggal Jaya | - | - | - | 208 | - | - | - | - | - | KUD Argo Makmur | - | - | - | 260 | 220 | 410 | 278 | - | - | KUD Harapan Jaya | - | - | - | - | 180 | 390 | 200 | - | 360 | Comply |
| Year | Plan (Ha) | Realization (Ha) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2016 | 307 | 291 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2017 | 607 | 586 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2018 | 636 | 633 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2019 | 667 | 651 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2020 | 609 | - | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2021 | 587 | - | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2022 | 377 | - | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2023 | 583 | - | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2024 | 400 | - | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Total | 4,789 | 2,161 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Sample | 2020 | 2021 | 2022 | 2023 | 2024 | 2025 | 2026 | 2027 | 2028 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| KUD Bina Usaha | 450 | 450 | 10 | - | - | - | - | - | - | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Koperasi Manunggal Jaya | - | - | - | 208 | - | - | - | - | - | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| KUD Argo Makmur | - | - | - | 260 | 220 | 410 | 278 | - | - | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| KUD Harapan Jaya | - | - | - | - | 180 | 390 | 200 | - | 360 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Principle 4: Use of appropriate best practices by growers and millers | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| Criterion 4.1 Operating procedures are appropriately documented, consistently implemented and monitored. | | | |
|--|---|--|--------|
| 4.1.1 | <p>Standard Operating Procedures (SOPs) for estates (land clearing to harvesting) and SOP for mills (reception of FFB to dispatch of CPO and PKO) shall be available.</p> <p>- Major compliance -</p> | <p>PT Inti Indosawit Subur – Tungkal Ulu Estate has documented and implemented procedures for oil palm plantation from land preparation up to replanting, as follow:</p> <ol style="list-style-type: none"> 1. SOP AA-APM-OP-1100.01-R4 dated 5 September 2016 Pembibitan (Nursery); 2. SOP AA-APM-OP-1100.02-R3 10 June 2015 Penanaman Areal Baru (New Planting); 3. SOP AA-APM-OP-1100.03-R2 24 July 2015 Pembuatan dan Perawatan Jalan dan Jembatan (Road and Bridge construction and maintenance); 4. SOP AA-APM-OP-1100.04-R3 07/12/2015 Pembuatan dan Pemeliharaan Parit berisi tentang tuntutan teknis pekerjaan pembuatan dan pemeliharaan parit secara sistematis explains culvert/drainage construction and maintenance; 5. SOP AA-APM-OP-1100.05-R3 23/11/2016 Konservasi Tanah dan Air explains Soil & Water Conservation; 6. SOP AA-APM-OP-1100.06-R6 16/02/2017 Menanam kacang related to Planting cover crops; 7. SOP AA-APM-OP-1100.07-R6 16/02/2017, Menanam Kelapa Sawit related to Planting; 8. SOP AA-APM-OP-1100.08-R6 11/05/2016 Pengendalian Gulma or Weed control; 9. SOP AA-APM-OP-1100.09. R5 5/09/2016 Pemupukan related to Fertilizer application; 10. SOP AA-APM-OP-1100.10. R6 23/11/2016 Pengendalian Hama dan Penyakit explains Pests & Disease Control; 11. SOP AA-APM-OP-1100.11. R1 01/02/2009 Pestisida dan Pengendaliannya for pesticide handling; 12. SOP AA-APM-OP-1100.12. R3 23/11/2016 Kastrasi explains castration (cutting all generative product (male flower, female flower, all fruit, to support vegetative growth) – done 5-6 months before being harvested; 13. SOP AA-APM-OP-1100.13. R3 04/03/2016 Tunas Pokok for pruning; 14. SOP AA-APM-OP-1100.14. R3 16/02/2017 Sensus dan Identifikasi Pokok explains census and palm identification; 15. SOP AA-APM-OP-1100.15. R2 01/10/2010 Sensus Produksi related to production census; 16. SOP AA-APM-OP-1100.16. R1 01/02/2009 Konsolidasi Pohon Tumbang explains provision of support to fallen palm; 17. SOP AA-APM-OP-1100.17. R1 23/10/2014 Pengelolaan Air related to water management; | Comply |

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| | | <p>18. SOP AA-APM-OP-1100.18. R3 20/04/2015 Potong Buah related to harvesting; 19. SOP AA-APM-OP-1100.19. R1 01/02/2009 Pengelolaan Transport explains FFB Transport; 20. SOP AA-APM-OP-1100.20-R6 16/02/2017 Replanting;</p> <p>Tungkal Ulu POM has documented and implemented procedure related to process of FFB to become CPO and PK, starts from FFB receiving to dispatch of CPO and PK. These procedure available as part of Mill Policy Manual:</p> <ul style="list-style-type: none"> • SOP AA-MPM-OP-1400.02.R2 Stasiun Penerimaan for FFB receiving station; • SOP AA-SOP-OP-101.5-R0 Grading; • SOP AA-MPM-OP-1400.03.R1 Stasiun Rebusan for sterilizer; • SOP AA-MPM-OP-1400.04.R1 Stasiun Pemisahan Berondolan for loose fruit separation; • SOP AA-MPM-OP-1400.05-R1 Stasiun Pengadukan dan Pengempaan for pressing station; • SOP AA-MPM-OP-1400.06-R1 Stasiun Pemurnian for clarification; • SOP AA-MPM-OP-1400.07-R1 Stasiun Pemisahan Nut dan Fiber for nut and fiber separation; • SOP AA-MPM-OP-1400.08-R1 Stasiun Kernel for kernel station; • SOP AA-MPM-OP-1400.09-R1 Stasiun Boiler; • SOP AA-MPM-OP-1400.10-R1 Stasiun Engine Room; • SOP AA-MPM-OP-1400.11-R1 Stasiun Water Treatment; • SOP AA-MPM-OP-1400.12-R1 Laboratorium; • SOP AA-MPM-OP-1400.13-R1 Stasiun Pengelolaan Limbah for palm oil mill effluent treatment; • SOP AA-MPM-OP-1400.14-R2 Stasiun Penimbunan dan Pengiriman CPO dan Kernel for CPO and PK bulking and despatch operation; • SOP AA-MPM-OP-1400.15-R1 Perawatan for preventive maintenance; • SOP AA-MPM-OP-1400.19.R2 Manajemen dan Metode Menghitung Emisi Gas Rumah Kaca (GHG) • SOP AA-MPM-OP-1400.18-R4 Book Keeping • AA-MPM-OP-1400.17-R6 Traceability <p>The mill operational procedures explains the flow process, specification of material and process, machinery and tools required, step-by-step process, control, monitoring and measurement and health and safety requirements.</p> | |
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| | | <p>Smallholder: Tungkal Ulu Smallholder has documented SOP as guidance for best agriculture practices and best management practices. The SOP was following the procedure of PT Inti Indosawit Subur. The procedure were sighted, for example:</p> <ol style="list-style-type: none"> 1. "Pembibitan" - Procedure of Nursery (SOP AA-Plasma-PP-KS-01); 2. "Pengendalian Hama dan Penyakit" - Procedure of Pest and Disease Control (SOP AA-Plasma-PP-KS-02); 3. "Pemupukan" – Procedure of Fertilizing (SOP AA-Plasma-PP-KS-03); 4. "Potong Buah" – Procedure of Harvesting (SOP AA-Plasma-PP-KS-04); 5. Procedure of Internal Communication Group Certification (007/DOK/SOP/AA2016); 6. Procedure of Assessment and Inspection Member Group Plantation (013/DOK/SOP/AA/2016); 7. FFB sale Mechanism (020/DOK/SOP/AA/2016). | |
| 4.1.2 | <p>Checking or monitoring of operations procedures is conducted at least once a year.</p> <p>- Minor compliance -</p> | <p>Checking or monitoring of Tungkal Ulu POM's operation for example documented in "Laporan Stasiun Sterilizer PMKS Tungkal Ulu Bulan Mei 2019", dated 17 May 2019. Sterilizer No.1, at 09.40, first cycle 10.30 – 12.10; second cycle 12.20 – 14.05. Sterilizer No.2, at 09.10, first cycle 09.35 – 11.10; second cycle 11.20 – 13.05; third cycle 13.10 – 14.45. Total cycle 14 cycles; Total lorry being took out 84 lorries; Total lorries being processed 82 lorries.</p> <p>"Laporan Stasiun Klarifikasi PMKS Tungkal Ulu Bulan Mei 2019", dated 17 May 2019. Using sludge centrifuge, Continuous Settling Tank: Monitoring the current aat sludge centrifuge every 2 hours: 47A at 12.00 – 48A at 14.00 – 47A at 16.00 – 46A at 18.00 – 47A at 20.00. Monitoring temperature at continuous settling tank every 2 hours: CST I reads 88°C at 12.00 - reads 94°C at 14.00 - reads 94°C at 16.00 - reads 95°C at 18.00 - reads 95°C at 20.00 Monitoring temperature at clean oil tank every 2 hours: Tank I reads 79°C at 12.00 - reads 85°C at 14.00 - reads 83°C at 16.00 - reads 84°C at 18.00 - reads 84°C at 20.00.</p> <p>Grading and sortation procedure implementation: FFB delivery note: "Surat Pengantar TBS KUD Bina Usaha, Hampan 12 Sawitri Makmur No.0400", dated 16 February 2019. Vehicle code BE9021TA, driver Eko, carrying 250 bunches. >Data Pengawasan Mutu TBS Hampan 12, KUD Bina Usaha, dated 16 February 2019, vehicle BE9021TA, driver Eko, 250 bunches FFB, sortation result: empty bunches 4 bunches (8%), ripe 42</p> | Comply |

| | | <p>bunches (84%), overripe 4 bunches (8%) – total sampled 50 bunches. Weighbridge ticket "Tiket Timbangan No.PTUA219101070" dated 16 February 2019, or 250 FFB bunches, nett weight 7,319 kg, FFB source from Sawitri Makmur, vehicle BE9021TA, RSPO certificate No.RSPO594422. FFB delivery note: "Surat Pengantar TBS KUD Sawit Kita, Hamparan 11 Rajawali No.0357", dated 16 April 2019. Vehicle code BH8589MK, driver Andi, carrying 300 bunches. "Data Pengawasan Mutu TBS Hamparan 11, KUD Sawit Kita, dated 16 April 2019, vehicle BH6583MK, driver Andi, 300 bunches FFB, sortation result: empty bunches 5 bunches (10%), ripe 45 bunches (90%) – total sampled 50 bunches. Weighbridge ticket "Tiket Timbangan No.PTUA219202221" dated 16 April 2019, or 300 FFB bunches, nett weight 6,455 kg, FFB source from Rajawali, vehicle BH6583MK, RSPO certificate No.RSPO594422.</p> <p>Daily Production Report - "Laporan Harian Pabrik", dated 17 May 2019: Total initial FFB stock 285,190 kg; FFB from company-owned estate 157,080 kg; FFB from scheme smallholder 54,613 kg; FFB from TKD 36,190 kg; FFB from Third party supplier 255,833 kg; Total received FFB certified 211,693 kg; Total received FFB non-certified 292,023 kg; Total FFB processed 615,016 kg; FFB certified fom company-owned estate processed 173,052 kg; FFB certified from scheme smallholder processed 101,774 kg; FFB non-certified processed 339,190 kg; Processing hour 10.69 hours; throughput 59.07 ton/hours; Total CPO production 126,210 kg; CPO certified production 61,329 kg; OER FFB certified from company-owned plantation 22.84%; OER FFB certified from scheme smallholder 21.42%; CPO non-certified production 64,881 kg; OER FFB non-certified 18.59%; Total PK production 31,690 kg; PK certified production 14,161 kg; OER PK certified 5.15%; PK non-certified production 17,529 kg; OER PK non-certified 5.15%.</p> <p>Throughput information</p> <table border="1"> <thead> <tr> <th>Month</th> <th>FFB processed (tons)</th> <th>Processing hour</th> <th>Throughput (ton/hour)</th> </tr> </thead> <tbody> <tr> <td colspan="4">2018</td> </tr> <tr> <td>January</td> <td>22,522</td> <td>390</td> <td>59.99</td> </tr> <tr> <td>February</td> <td>18,625</td> <td>333</td> <td>57.90</td> </tr> </tbody> </table> | Month | FFB processed (tons) | Processing hour | Throughput (ton/hour) | 2018 | | | | January | 22,522 | 390 | 59.99 | February | 18,625 | 333 | 57.90 | |
|----------|----------------------|--|-----------------------|----------------------|-----------------|-----------------------|------|--|--|--|---------|--------|-----|-------|----------|--------|-----|-------|--|
| Month | FFB processed (tons) | Processing hour | Throughput (ton/hour) | | | | | | | | | | | | | | | | |
| 2018 | | | | | | | | | | | | | | | | | | | |
| January | 22,522 | 390 | 59.99 | | | | | | | | | | | | | | | | |
| February | 18,625 | 333 | 57.90 | | | | | | | | | | | | | | | | |

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|-----------|--|---|--------|--------|-----|-------|-------|--------|-----|-------|-----|--------|-----|-------|------|--------|-----|-------|------|--------|-----|-------|--------|--------|-----|-------|-----------|--------|-----|-------|---------|--------|-----|-------|----------|--------|-----|-------|----------|--------|-----|-------|-------|---------|-------|-------|------|--|--|--|---------|--------|-----|-------|----------|--------|-----|-------|-------|--------|-----|-------|-------|--------|-----|-------|-------|--------|-------|-------|--|
| | | <table border="1"> <tr><td>March</td><td>16,143</td><td>288</td><td>58.83</td></tr> <tr><td>April</td><td>17,616</td><td>301</td><td>61.33</td></tr> <tr><td>May</td><td>25,116</td><td>436</td><td>60.01</td></tr> <tr><td>June</td><td>25,026</td><td>437</td><td>59.69</td></tr> <tr><td>July</td><td>32,007</td><td>578</td><td>57.72</td></tr> <tr><td>August</td><td>31,003</td><td>536</td><td>60.42</td></tr> <tr><td>September</td><td>31,490</td><td>549</td><td>59.86</td></tr> <tr><td>October</td><td>30,910</td><td>537</td><td>59.70</td></tr> <tr><td>November</td><td>28,260</td><td>480</td><td>61.48</td></tr> <tr><td>December</td><td>26,019</td><td>451</td><td>60.31</td></tr> <tr><td>Total</td><td>304,737</td><td>5,312</td><td>59.75</td></tr> <tr><td colspan="4">2019</td></tr> <tr><td>January</td><td>21,421</td><td>379</td><td>58,98</td></tr> <tr><td>February</td><td>17,047</td><td>296</td><td>60,16</td></tr> <tr><td>March</td><td>17,053</td><td>298</td><td>59,49</td></tr> <tr><td>April</td><td>16,832</td><td>302</td><td>57,70</td></tr> <tr><td>Total</td><td>72,353</td><td>1,275</td><td>59,07</td></tr> </table> <p>Checking or monitoring of Tungkal Ulu Estate's operation for example documented in Internal Audit Report and VA Report. Internal audit RSPO P&C INA-NI 2016 to Tungkal Ulu Estate, dated 10-13 December 2018 by Hendryk Kristian Simanjuntak, Rico Santoso, Ian Septian Arifin. The internal audit resulted in 11 observations. 3 observations have been followed up on 10 April 2019, the remaining is open. VA Report – Inti, visit for agronomy aspects and KPI for company-owned plantation 7-11 August 2018</p> | March | 16,143 | 288 | 58.83 | April | 17,616 | 301 | 61.33 | May | 25,116 | 436 | 60.01 | June | 25,026 | 437 | 59.69 | July | 32,007 | 578 | 57.72 | August | 31,003 | 536 | 60.42 | September | 31,490 | 549 | 59.86 | October | 30,910 | 537 | 59.70 | November | 28,260 | 480 | 61.48 | December | 26,019 | 451 | 60.31 | Total | 304,737 | 5,312 | 59.75 | 2019 | | | | January | 21,421 | 379 | 58,98 | February | 17,047 | 296 | 60,16 | March | 17,053 | 298 | 59,49 | April | 16,832 | 302 | 57,70 | Total | 72,353 | 1,275 | 59,07 | |
| March | 16,143 | 288 | 58.83 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| April | 17,616 | 301 | 61.33 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| May | 25,116 | 436 | 60.01 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| June | 25,026 | 437 | 59.69 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| July | 32,007 | 578 | 57.72 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| August | 31,003 | 536 | 60.42 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| September | 31,490 | 549 | 59.86 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| October | 30,910 | 537 | 59.70 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| November | 28,260 | 480 | 61.48 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| December | 26,019 | 451 | 60.31 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Total | 304,737 | 5,312 | 59.75 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2019 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| January | 21,421 | 379 | 58,98 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| February | 17,047 | 296 | 60,16 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| March | 17,053 | 298 | 59,49 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| April | 16,832 | 302 | 57,70 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Total | 72,353 | 1,275 | 59,07 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4.1.3 | <p>Records of monitoring and any follow-up actions shall be available.</p> <p>- Minor compliance -</p> | <p>Tungkal Ulu Estate: Internal audit RSPO P&C INA-NI 2016 to Tungkal Ulu Estate, dated 10-13 December 2018 by Hendryk Kristian Simanjuntak, Rico Santoso, Ian Septian Arifin. The internal audit resulted in 11 observations. 3 observations have been followed up on 10 April 2019, the remaining is open.</p> | Comply | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| | | <p>VA Report – Inti, visit for agronomy aspects and KPI for company-owned plantation 7-11 August 2018:</p> | | | | | | | | |
|--|---|---|--------|-------------|--|---|---|---|--|--|
| | | <table border="1"> <thead> <tr> <th data-bbox="745 438 1294 491">Issues</th> <th data-bbox="1294 438 1933 491">Action plan</th> </tr> </thead> <tbody> <tr> <td data-bbox="745 491 1294 818"> <p>Condition of circles in several blocks was poor due to uncompleted program resulting from shortage of workers; while in several blocks encroaching <i>Stenochlaena</i> was noticed.</p> </td> <td data-bbox="1294 491 1933 818"> <ul style="list-style-type: none"> - Immediately recruit additional sprayers factoring in requirement for replanting; - Assisstant supervise the quality of work as per SOP; - Widen the circles with <i>paraquat methyl</i> cocktail where fern are dominant – complete 21 Ha by September 2018; - Management to remove encroaching ferns manually when condition was still light – progressed 140 Ha by October 2018; </td> </tr> <tr> <td data-bbox="745 818 1294 1206"> <p>Condition of interrow in several blocks was similarly poor, significantly tall woodies were sighted in afeling 5 and 7</p> </td> <td data-bbox="1294 818 1933 1206"> <ul style="list-style-type: none"> - Management need to review on weeder requirement and monitor the daily outturn Immediately recruit additional sprayers factoring in requirement for replanting; - Assisstant supervise the quality of work as per SOP; - Widen the circles with paraquat methyl cocktail where fern are dominant – progressed January 2019 - Management to remove encroaching ferns manually when condition was still light – progressed 10 Ha in November 2018; </td> </tr> <tr> <td data-bbox="745 1206 1294 1367"> <p>There were some dead palms still not handled as per SOP</p> </td> <td data-bbox="1294 1206 1933 1367"> <ul style="list-style-type: none"> - Immediately treat all dead palm as per SOP – completed equal to 15 Ha in August 2018; - Mandore to report to assisstant for such dead palm; </td> </tr> </tbody> </table> | Issues | Action plan | <p>Condition of circles in several blocks was poor due to uncompleted program resulting from shortage of workers; while in several blocks encroaching <i>Stenochlaena</i> was noticed.</p> | <ul style="list-style-type: none"> - Immediately recruit additional sprayers factoring in requirement for replanting; - Assisstant supervise the quality of work as per SOP; - Widen the circles with <i>paraquat methyl</i> cocktail where fern are dominant – complete 21 Ha by September 2018; - Management to remove encroaching ferns manually when condition was still light – progressed 140 Ha by October 2018; | <p>Condition of interrow in several blocks was similarly poor, significantly tall woodies were sighted in afeling 5 and 7</p> | <ul style="list-style-type: none"> - Management need to review on weeder requirement and monitor the daily outturn Immediately recruit additional sprayers factoring in requirement for replanting; - Assisstant supervise the quality of work as per SOP; - Widen the circles with paraquat methyl cocktail where fern are dominant – progressed January 2019 - Management to remove encroaching ferns manually when condition was still light – progressed 10 Ha in November 2018; | <p>There were some dead palms still not handled as per SOP</p> | <ul style="list-style-type: none"> - Immediately treat all dead palm as per SOP – completed equal to 15 Ha in August 2018; - Mandore to report to assisstant for such dead palm; |
| Issues | Action plan | | | | | | | | | |
| <p>Condition of circles in several blocks was poor due to uncompleted program resulting from shortage of workers; while in several blocks encroaching <i>Stenochlaena</i> was noticed.</p> | <ul style="list-style-type: none"> - Immediately recruit additional sprayers factoring in requirement for replanting; - Assisstant supervise the quality of work as per SOP; - Widen the circles with <i>paraquat methyl</i> cocktail where fern are dominant – complete 21 Ha by September 2018; - Management to remove encroaching ferns manually when condition was still light – progressed 140 Ha by October 2018; | | | | | | | | | |
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| | | <p>Backlog in pruning become perennial problem due to shortage of pruners;</p> <p>Continuous low output due to overwhelming fronds resulted in high turnover with variable standard of pruning;</p> <p>About 412 Ha backlog and significant black loose fruit (losses) seen in the circles;</p> | <ul style="list-style-type: none"> - Immediately commence pruning in blocks that are 4 months due; - Recruit additional harvester for those due above 5 months at competitive rate; - Complete the backlog in next 2 months – 90 Ha completed in August – October 2018; - Better supervision by random inspection consistently implemented every month. | | |
| | | <p>Overwhelming weeds were sighted in several blocks due to delay in pre planting spraying which will increase weed germination later and compromise cover crop</p> | <ul style="list-style-type: none"> - Adhere to SOP on upkeep before felling, no noxious weeds and circles are wide and clean until felling to recover crop; - Ensure pre-planting spraying done within 25 days after felling and continue to spray 25 to 30 days until fully covered; - Manual weeding along the drills to prevent flowering of weeds; - Ongoing. 633 Ha between August – December 2018 | | |
| | | <p>Tungkal Ulu POM: Visit Engineering to PT. Inti Indosawit Subur – Tungkal Ulu POM, dated 17-19 October 2018, resulted in 10 findings related to POME Land Application, FFB conveyor, thick smoke from boiler chimney. The findings have been closed out, as of 30 December 2018.</p> <p>Smallholder: Head of Plasma (Scheme Smallholder visit) dated 7 April 2019 to Tungkal Ulu scheme smallholder. He highlighted the problem with FFB quality (unripe FFB harvested by smallholder); lower CPO/Ha production; smallholder selling to outside mill; replanting progress (Plantation office disagree with the cost Rp.6,133,251); Not all smallholder submit the administrative requirements. Action plan:</p> | | | |

| | | | |
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| | | <ul style="list-style-type: none"> - FFB quality (unripe FFB harvested by smallholder) – to separate unripe FFB and optimize sorting FFB at harvesting pad; - lower CPO/Ha production – grading sample in POM, improve accuracy for FFB in harvesting pad from a smallholder group; - smallholder selling to outside mill – issue warning letter and impose blacklist to transporter; - replanting progress (Plantation office disagree with the cost Rp.6,133,251) - to give explanation to smallholder and plantation office; - not all smallholder submit the administrative requirements – re-collect SHM, KK, KTP and other documents; mapping the smallholder group’s ready-to-replant area <p>Internal audit for scheme smallholder carried out 12-14 December 2018 by Hendryk Simanjutak, Ridho Ilahi, Ian Septian. 3 findings related to seedling certificate – seedling certificate documents made available in scheme smallholder/plasma office (closed 28 January 2019); no program for fossil fuel efficiency – prepare fossil fuel efficiency program and made reminder (closed 28 January 2019); no record on PPE handover to smallholder/KUD – filling documentation on PPE handover and scheduled (closed 28 January 2019).</p> | |
| 4.1.4 | <p>Records of the origins of all third-party FFB sourced (collector, deliver, Cooperative, Farmers Association and outgrower) shall be available.</p> <p>- Major compliance -</p> | <p>PT. Inti Indosawit Subur – Tungkal Ulu POM has a policy related to purchase of non-certified FFB under “Kebijakan Perusahaan”, dated 1 December 2014. Point 17 stated “Melakukan komunikasi dan evaluasi kepada pihak ketiga terkait asal penerimaan TBS dari lahan yang legalitasnya dapat dibuktikan, tidak ada pembakaran untuk pembukaan areal baru maupun peremajaan (replanting), tidak melakukan pembukaan areal gambut setelah September 2014, tidak terdapat konflik lahan dan tidak mempekerjakan anak-anak dalam pengelolaannya” – To communicate and evaluate third party related to purchase of FFB from legally demonstrable area, no burning for new development or replanting, no new development in peat area after September 2014, no land conflict and not employing children in the process”.</p> <p>There are several FFB suppliers which registered as third party FFB supplier of Tungkal Ulu POM in 2018 as listed below. FFB received from third party recorded each day in “Laporan Harian Pabrik” and reported each month in “Laporan Unit Pabrik”. Names of third party suppliers are: KUD Bina Usaha SP 1, YES, KSP, HD, Victory, Trading Makmur, Jaya Mandiri, Merlung Topaz, MH, Gapoktan</p> | Comply |

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| | | <p>Maju Jaya, Penyabungan Topaz, Gapoktan Usaha Berkat, Asosiasi Tani Bersama, Novie Zulhi and Teguh Prayoga.</p> <p>PT. Inti Indosawit Subur – Tungkal Ulu POM has a procedure to communicate and evaluate the source of third party FFB (non-certified) as on "SOP Pembelian TBS Luar No.AA- MM-506.1-R3) dated 19 December 2018. The objective of the procedure was to ensure third party FFB sourced from non-forest area, completed with legal ownership of the land. The procedure consist of various steps: to check supporting document from supplier (delivery order, declaration, plantation block maps); compare the plantation location map/coordinate against the legal documents; verification team will compare the plantation location map against the spatial mapping; conduct field verification to the source of FFB (oil palm plantation belong to farmer), randomly selected samples; verification team will prepare database, prepare the list the complying suppliers. Supply of FFB from area which legally contested or coming from protected forest, forest area, conservation area – will be rejected.</p> <p>The third party FFB supplier has signed documented statement and guarantee - "Pernyataan dan Jaminan", as a supplier of FFB. The documents stipulated:</p> <ul style="list-style-type: none"> • Farmer group willingly provide GPS coordinate on the source of FFB plantation/location; • FFB supplied does not originate from unauthorized areas, such as forest area or area prohibited to be planted with oil palm, not limited to: • Protected Forest Area – Tesso Nilo National Park, Bukit Tiga Puluh National Park, Bukit Kusuma National Park; • Industrial Forest Area; • Production Forest Area – including "Hutan Produksi Tetap (HP)", "Hutan Produksi Terbatas (HPT)", Hutan Produksi Konversi (HPK)"; • Conservation Area; • The FFB supplied not from Scheme Smallholder of PT. Inti Indosawit Subur – Tungkal Ulu; • The FFB supplied not from rejected FFB out of PT. Inti Indosawit Subur – Tungkal Ulu POM; • The FFB supplied does not originated from from stealing and/or obtained by violating laws. • The FFB supplied does not originated from new planting which converting forest land and/or peat land after September 2014; • The FFB supplied does not originated from conflicted/disputed land; • The supplier does not conduct land burning during land preparation and replanting; | |
|--|--|--|--|

| | | |
|--|---|--|
| | <ul style="list-style-type: none"> The supplier does not employed children under 18 years old; the supplier pays the worker in accordance to provincial or regency minimum wage; <p>Record verified:</p> <ul style="list-style-type: none"> "Pernyataan dan Jaminan Pemasok TBS" signed by Mr. Novie Zulhi, dated 12 October 2018; "Pernyataan dan Jaminan Pemasok TBS" signed by Mr. Muslim from collector Makmur Mandiri, dated 3 January 2019. The area covers 3,000 Ha – located in Kausar, Ketaw, Merlung, Penyabungan, Lubuk Madrasah; oil palm aged 7 years; "Pernyataan dan Jaminan Pemasok TBS" signed by Mr. Hasbullah as leader of farmer group HD, dated 12 October 2018. <p>"Daftar Kebun Makmur Mandiri", consist of 46 plots in Dusun Mudo, total 2,840 Ha, completed with name of owners, hectarage, GPS coordinates, address and land status (APL). Sample: Mustain; address Dusun Mudo; hectare area 26 Ha; GPS: 1° 15' 37.7" S and 103° 8' 11.1"E; status APL (non forest). Another parcel consist of 21 plots in Dusun Mudo, total 79 Ha. Sample: Kalun; address Dusun Mudo; hectare area 4 Ha; GPS: 1° 16' 12.3" S and 102° 50' 47.4" E; status APL (non forest);</p> <p>"Daftar Kebun Novie Zulhi", consist of 130 plots in Merlung village and Lampisi village, total 617.3 Ha, completed with name of owners, hectarage, GPS coordinates, address and land status (APL). Sample: Sunarjo; address Lampisi village; hectare area 9 Ha; GPS: 1° 17' 37.7" S and 102° 58' 5.2"E; status APL (non forest).</p> <p>"Daftar Kebun HD", consist of 28 plots in Penyabungan village, total 128 Ha, completed with name of owners, hectarage, GPS coordinates, address and land status (APL). Sample: H. Limin; address Peyabungan village; hectare area 2 Ha; GPS: 1° 19' 25.18" S and 102° 53' 25.16"E; status APL (non forest).</p> <p>Company provide map defining the location of third-party FFB suppliers – overlaid against the forest area map based on "Keputusan Menteri Kehutanan Republik Indonesia SK.727/Menhut-II/2012 tentang PetaPerubahan Peruntukan Kawasan Hutan Menjadi Bukan Kawasan Hutan dan Perubahan Fungsi Kawasan Hutan di Provinsi Jambi" dated 10 December 2012. It was evident, the location of third-party FFB supplier are outside protected forest area, outside production forest area, outside industrial forest area, outside conservation area.</p> | |
|--|---|--|

| | | <p>Record of FFB from third parties in 2019 (tons)</p> <table border="1"> <thead> <tr> <th>Third party FFB supplier</th> <th>January</th> <th>February</th> <th>March</th> <th>April</th> </tr> </thead> <tbody> <tr> <td>YES</td> <td>212.755</td> <td>146.668</td> <td>88.097</td> <td>86.021</td> </tr> <tr> <td>KSP</td> <td>212.384</td> <td>212.049</td> <td>113.383</td> <td>38.973</td> </tr> <tr> <td>HD</td> <td>2,676.135</td> <td>2,040.720</td> <td>2,328.519</td> <td>2,249.147</td> </tr> <tr> <td>Victory</td> <td>16646</td> <td></td> <td>26,222</td> <td>9.581</td> </tr> <tr> <td>Trading Makmur</td> <td>19.669</td> <td></td> <td>156,021</td> <td>301.433</td> </tr> <tr> <td>Makmur Mandiri</td> <td>384.358</td> <td>1,164.823</td> <td>1.045,254</td> <td>1,360.010</td> </tr> <tr> <td>Jaya Mandiri</td> <td>665.253</td> <td>167.411</td> <td>-</td> <td>-</td> </tr> <tr> <td>Merlung Topaz</td> <td>332.724</td> <td>308.679</td> <td>334,126</td> <td>328.796</td> </tr> <tr> <td>MH</td> <td>414.950</td> <td>102.234</td> <td>8,627</td> <td>1.150</td> </tr> <tr> <td>Gapoktan Maju Jaya</td> <td>800.022</td> <td>453.271</td> <td>523,684</td> <td>566.118</td> </tr> <tr> <td>Penyabungan Topaz</td> <td>508.593</td> <td>274.980</td> <td>376,044</td> <td>291.402</td> </tr> <tr> <td>Gapoktan Usaha Berkat</td> <td>-</td> <td>-</td> <td>91,531</td> <td>112.823</td> </tr> <tr> <td>Asosiasi Tani Bersama</td> <td>1,000.925</td> <td>395.930</td> <td>107,136</td> <td>10.018</td> </tr> <tr> <td>Novie Zulhi</td> <td>1,043.124</td> <td>746.450</td> <td>620,817</td> <td>444.103</td> </tr> <tr> <td>DK</td> <td>181.411</td> <td>-</td> <td>71,134</td> <td>1,143.021</td> </tr> </tbody> </table> | Third party FFB supplier | January | February | March | April | YES | 212.755 | 146.668 | 88.097 | 86.021 | KSP | 212.384 | 212.049 | 113.383 | 38.973 | HD | 2,676.135 | 2,040.720 | 2,328.519 | 2,249.147 | Victory | 16646 | | 26,222 | 9.581 | Trading Makmur | 19.669 | | 156,021 | 301.433 | Makmur Mandiri | 384.358 | 1,164.823 | 1.045,254 | 1,360.010 | Jaya Mandiri | 665.253 | 167.411 | - | - | Merlung Topaz | 332.724 | 308.679 | 334,126 | 328.796 | MH | 414.950 | 102.234 | 8,627 | 1.150 | Gapoktan Maju Jaya | 800.022 | 453.271 | 523,684 | 566.118 | Penyabungan Topaz | 508.593 | 274.980 | 376,044 | 291.402 | Gapoktan Usaha Berkat | - | - | 91,531 | 112.823 | Asosiasi Tani Bersama | 1,000.925 | 395.930 | 107,136 | 10.018 | Novie Zulhi | 1,043.124 | 746.450 | 620,817 | 444.103 | DK | 181.411 | - | 71,134 | 1,143.021 | |
|---|--|---|--------------------------|-----------|----------|-------|-------|-----|---------|---------|--------|--------|-----|---------|---------|---------|--------|----|-----------|-----------|-----------|-----------|---------|-------|--|--------|-------|----------------|--------|--|---------|---------|----------------|---------|-----------|-----------|-----------|--------------|---------|---------|---|---|---------------|---------|---------|---------|---------|----|---------|---------|-------|-------|--------------------|---------|---------|---------|---------|-------------------|---------|---------|---------|---------|-----------------------|---|---|--------|---------|-----------------------|-----------|---------|---------|--------|-------------|-----------|---------|---------|---------|----|---------|---|--------|-----------|--|
| Third party FFB supplier | January | February | March | April | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| YES | 212.755 | 146.668 | 88.097 | 86.021 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| KSP | 212.384 | 212.049 | 113.383 | 38.973 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| HD | 2,676.135 | 2,040.720 | 2,328.519 | 2,249.147 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Victory | 16646 | | 26,222 | 9.581 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Trading Makmur | 19.669 | | 156,021 | 301.433 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Makmur Mandiri | 384.358 | 1,164.823 | 1.045,254 | 1,360.010 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Jaya Mandiri | 665.253 | 167.411 | - | - | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Merlung Topaz | 332.724 | 308.679 | 334,126 | 328.796 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| MH | 414.950 | 102.234 | 8,627 | 1.150 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Gapoktan Maju Jaya | 800.022 | 453.271 | 523,684 | 566.118 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Penyabungan Topaz | 508.593 | 274.980 | 376,044 | 291.402 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Gapoktan Usaha Berkat | - | - | 91,531 | 112.823 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Asosiasi Tani Bersama | 1,000.925 | 395.930 | 107,136 | 10.018 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Novie Zulhi | 1,043.124 | 746.450 | 620,817 | 444.103 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| DK | 181.411 | - | 71,134 | 1,143.021 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>Criterion 4.2 Practices maintain soil fertility at, or where possible improve soil fertility to a level that ensures optimal and sustained yield.</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4.2.1 | <p>A record of SOP implementation to maintain soil fertility that ensures optimal and sustained yield, shall be available.</p> <p>- Major compliance -</p> | <p>The company has established procedure soil fertility in "SOP AA-APM-OP-1100.09. R1" - SOP Pemupukan, consist of type and recommendation of fertilizer for immature and mature areas, cycle, dosage and time of fertilizer applied. During field visit can be demonstrated that company has applied management strategy to maintain soil fertility according to the procedure. Manuring was performed manually with spreading the fertilizer by person uniformly in each palm oil trees in accordance with dosage, which has defined by Research and Development recommendation.</p> | Comply | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| | | <p>Fertilizers were applied to maintain and increase soil fertility, fertilizer applied in accordance to the fertilizer recommendation which established based on soil and leaf analysis results. Records of fertilizer application in Tungkal Ulu Estate for 2018 and 2019 are available as well as recommendation in "Fertilizer Application and Recommendation".</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--------------------|---|--|--------------------|--------------------|--|---------------------|------------------|----|-----------|-----------|----|---------|---------|-----|---------|---------|-----------|--------|--------|----------|---------|---------|------|--------|--------|-----|------------|-----------|--------------------|--------------------|--|---------------------|------------------|--------|--------|--------|----|-----------|---------|----|---------|--------|-----|---------|---------|-----------|--------|--------|---------------|
| <p>4.2.2</p> | <p>Records of fertilizer inputs shall be available. - Minor compliance -</p> | <p>Fertilizer recommendation and actual implementation is recorded under "Fertilizer Application and Recommendation" and "Laporan Unit Kebun".</p> <p>Below are fertilizer input of Tungkal Ulu Estate in 2018:</p> <table border="1" data-bbox="757 651 1532 991"> <thead> <tr> <th rowspan="2">Type of Fertilizer</th> <th colspan="2">Tungkal Ulu Estate</th> </tr> <tr> <th>Recommendation (kg)</th> <th>Realization (kg)</th> </tr> </thead> <tbody> <tr> <td>ZA</td> <td>1,229,324</td> <td>1,229,331</td> </tr> <tr> <td>RP</td> <td>415,860</td> <td>415,863</td> </tr> <tr> <td>MOP</td> <td>861,615</td> <td>861,620</td> </tr> <tr> <td>Kieserite</td> <td>11,718</td> <td>11,718</td> </tr> <tr> <td>Dolomite</td> <td>400,069</td> <td>400,069</td> </tr> <tr> <td>HGFB</td> <td>21,055</td> <td>21,055</td> </tr> <tr> <td>EFB</td> <td>13,207,878</td> <td>6,321,604</td> </tr> </tbody> </table> <p>Below are fertilizer input of Tungkal Ulu Estate in 2019 (realization up to April 2019):</p> <table border="1" data-bbox="757 1102 1532 1367"> <thead> <tr> <th rowspan="2">Type of Fertilizer</th> <th colspan="2">Tungkal Ulu Estate</th> </tr> <tr> <th>Recommendation (kg)</th> <th>Realization (kg)</th> </tr> </thead> <tbody> <tr> <td>Hi-Kay</td> <td>88,151</td> <td>88,153</td> </tr> <tr> <td>ZA</td> <td>1,005,650</td> <td>434,983</td> </tr> <tr> <td>RP</td> <td>336,354</td> <td>42,031</td> </tr> <tr> <td>MOP</td> <td>673,870</td> <td>298,712</td> </tr> <tr> <td>Kieserite</td> <td>57,006</td> <td>30,904</td> </tr> </tbody> </table> | Type of Fertilizer | Tungkal Ulu Estate | | Recommendation (kg) | Realization (kg) | ZA | 1,229,324 | 1,229,331 | RP | 415,860 | 415,863 | MOP | 861,615 | 861,620 | Kieserite | 11,718 | 11,718 | Dolomite | 400,069 | 400,069 | HGFB | 21,055 | 21,055 | EFB | 13,207,878 | 6,321,604 | Type of Fertilizer | Tungkal Ulu Estate | | Recommendation (kg) | Realization (kg) | Hi-Kay | 88,151 | 88,153 | ZA | 1,005,650 | 434,983 | RP | 336,354 | 42,031 | MOP | 673,870 | 298,712 | Kieserite | 57,006 | 30,904 | <p>Comply</p> |
| Type of Fertilizer | Tungkal Ulu Estate | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Recommendation (kg) | Realization (kg) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| ZA | 1,229,324 | 1,229,331 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| RP | 415,860 | 415,863 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| MOP | 861,615 | 861,620 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Kieserite | 11,718 | 11,718 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Dolomite | 400,069 | 400,069 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| HGFB | 21,055 | 21,055 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| EFB | 13,207,878 | 6,321,604 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Type of Fertilizer | Tungkal Ulu Estate | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Recommendation (kg) | Realization (kg) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Hi-Kay | 88,151 | 88,153 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| ZA | 1,005,650 | 434,983 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| RP | 336,354 | 42,031 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| MOP | 673,870 | 298,712 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Kieserite | 57,006 | 30,904 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| | | |
|----------|------------|-----------|
| Dolomite | 271,700 | 212,620 |
| HGFB | 21,742 | 5,967 |
| EFB | 39,984,051 | 6,392,801 |
| Solid | 6,278,510 | 238,000 |

Smallholder:

Plasma Tungkal Ulu records of fertilizer input are documented in "Rekomendasi & Realisasi Pemupukan". Below are record of fertilizer input for year 2018 and 2019 in sampled scheme smallholder cooperatives:

KUD Bina Usaha:

| Type of Fertilizer | 2018 | | 2019 | |
|--------------------|--------------|------------------|--------------|------------------|
| | Recomd. (kg) | Realization (kg) | Recomd. (kg) | Realization (kg) |
| ZA | 511,875 | 511,876 | 511,875 | 255,959 |
| MOP | 398,125 | 398,126 | 398,125 | 199,063 |
| RP | 170,625 | 170,625 | 170,625 | - |
| Kieserite | 113,750 | 113,750 | 113,750 | 113,750 |
| HGFB | 11,375 | 11,375 | 11,375 | - |

Koperasi Manunggal Jaya:

| Type of Fertilizer | 2018 | | 2019 | |
|--------------------|--------------|------------------|--------------|------------------|
| | Recomd. (kg) | Realization (kg) | Recomd. (kg) | Realization (kg) |
| ZA | 117,000 | 117,000 | 117,000 | 58,500 |
| MOP | 91,000 | 91,000 | 91,000 | 45,500 |
| RP | 39,000 | 39,000 | 39,000 | - |
| Kieserite | 26,000 | 26,000 | 26,000 | 26,000 |
| HGFB | 1,950 | 1,950 | 1,950 | 1,950 |

| | | <p>KUD Argo Makmur:</p> <table border="1"> <thead> <tr> <th rowspan="2">Type of Fertilizer</th> <th colspan="2">2018</th> <th colspan="2">2019</th> </tr> <tr> <th>Recomd. (kg)</th> <th>Realization (kg)</th> <th>Recomd. (kg)</th> <th>Realization (kg)</th> </tr> </thead> <tbody> <tr> <td>ZA</td> <td>635,625</td> <td>635,626</td> <td>635,625</td> <td>317,813</td> </tr> <tr> <td>MOP</td> <td>494,375</td> <td>494,376</td> <td>494,375</td> <td>247,188</td> </tr> <tr> <td>RP</td> <td>141,250</td> <td>141,250</td> <td>141,250</td> <td>-</td> </tr> <tr> <td>Kieserite</td> <td>141,250</td> <td>141,250</td> <td>141,250</td> <td>-</td> </tr> <tr> <td>HGFB</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> </tr> </tbody> </table> <p>KUD Harapan Jaya:</p> <table border="1"> <thead> <tr> <th rowspan="2">Type of Fertilizer</th> <th colspan="2">2018</th> <th colspan="2">2019</th> </tr> <tr> <th>Recomd. (kg)</th> <th>Realization (kg)</th> <th>Recomd. (kg)</th> <th>Realization (kg)</th> </tr> </thead> <tbody> <tr> <td>ZA</td> <td>600,313</td> <td>600,313</td> <td>600,313</td> <td>317,813</td> </tr> <tr> <td>MOP</td> <td>494,375</td> <td>494,376</td> <td>494,375</td> <td>247,188</td> </tr> <tr> <td>RP</td> <td>141,250</td> <td>141,250</td> <td>141,250</td> <td>-</td> </tr> <tr> <td>Kieserite</td> <td>141,250</td> <td>141,250</td> <td>141,250</td> <td>141,250</td> </tr> <tr> <td>HGFB</td> <td>10,594</td> <td>10,594</td> <td>10,594</td> <td>-</td> </tr> </tbody> </table> | Type of Fertilizer | 2018 | | 2019 | | Recomd. (kg) | Realization (kg) | Recomd. (kg) | Realization (kg) | ZA | 635,625 | 635,626 | 635,625 | 317,813 | MOP | 494,375 | 494,376 | 494,375 | 247,188 | RP | 141,250 | 141,250 | 141,250 | - | Kieserite | 141,250 | 141,250 | 141,250 | - | HGFB | - | - | - | - | Type of Fertilizer | 2018 | | 2019 | | Recomd. (kg) | Realization (kg) | Recomd. (kg) | Realization (kg) | ZA | 600,313 | 600,313 | 600,313 | 317,813 | MOP | 494,375 | 494,376 | 494,375 | 247,188 | RP | 141,250 | 141,250 | 141,250 | - | Kieserite | 141,250 | 141,250 | 141,250 | 141,250 | HGFB | 10,594 | 10,594 | 10,594 | - | |
|--------------------|--|---|--------------------|------------------|--|------|--|--------------|------------------|--------------|------------------|----|---------|---------|---------|---------|-----|---------|---------|---------|---------|----|---------|---------|---------|---|-----------|---------|---------|---------|---|------|---|---|---|---|--------------------|------|--|------|--|--------------|------------------|--------------|------------------|----|---------|---------|---------|---------|-----|---------|---------|---------|---------|----|---------|---------|---------|---|-----------|---------|---------|---------|---------|------|--------|--------|--------|---|--|
| Type of Fertilizer | 2018 | | | 2019 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Recomd. (kg) | Realization (kg) | Recomd. (kg) | Realization (kg) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| ZA | 635,625 | 635,626 | 635,625 | 317,813 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| MOP | 494,375 | 494,376 | 494,375 | 247,188 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| RP | 141,250 | 141,250 | 141,250 | - | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Kieserite | 141,250 | 141,250 | 141,250 | - | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| HGFB | - | - | - | - | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Type of Fertilizer | 2018 | | 2019 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Recomd. (kg) | Realization (kg) | Recomd. (kg) | Realization (kg) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| ZA | 600,313 | 600,313 | 600,313 | 317,813 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| MOP | 494,375 | 494,376 | 494,375 | 247,188 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| RP | 141,250 | 141,250 | 141,250 | - | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Kieserite | 141,250 | 141,250 | 141,250 | 141,250 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| HGFB | 10,594 | 10,594 | 10,594 | - | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4.2.3 | <p>Records of periodical leaf, soil and visual analysis shall be available. - Minor compliance -</p> | <p>Records of periodical leaf sampling and visual analysis were available. Leaf analysis performed by Research and Development Centre PT Nusa Pusaka Kencana Analytical & QC Laboratory. Foliar Analysis Report document shows that leaf sampling and analysis has been done recently in April 2018. The results were used to develop fertilizer recommendation of 2019. For example it was shown Foliar Analysis Report #084/INT/R&D/MEI/L/18 dated 19 May 2018. Number of samples 15+3, e.g. Lab Ref 18L07071, Block E93a (A), year of planting 1993, Afdeling 5 Tungkal Ulu Estate; frond: 17, Ash= 6.83, N= 2.65, P= 0.165, K= 1.02, Mg= 0.28, Ca= 0.60 (all UOM % on DM), and B= 14 ppm on DM.</p> <p>Evidence of soil analysis was shown as on Periodical Soil analysis results in form of "Hasil Analisis Pengujian Tanah" issued by independent laboratory of environment quality analysis "Binalab".</p> | Comply | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| | | | |
|-------|---|---|--------|
| | | <p>Evident sighted for period May 2018, e.g. certificate number 104-2/T/BINA/V/2018 dated 28 May 2018, mentioning result of soil analysis with parameter among others: clay, dust, sand, texture name, pH H₂O, Organic C, total N, Pb, Zn, fat, porosity and permeability in various depth (0-20 cm, 20-40 cm, 40-60 cm, 60-80 cm, 80-100 cm and 100-120 cm).</p> <p>Smallholder: Leaf analysis in Plasma Tungkal Ulu was performed by Research and Development Centre PT Nusa Pusaka Kencana Analytical & QC Laboratory. Foliar Analysis Report document shows that leaf sampling and analysis has been done recently in April 2018. The results were used to develop fertilizer recommendation of 2019. For example it was shown "Oil Palm Leaf Analysis" for Plasma Tungkal Ulu Division I (KUD Bina Usaha), number of samples 3, YOP 1992, Sample No.16: N= 2.34, P= 0.17, K= 0.63, Mg= 0.21, Ca= 0.72 (all UOM % on DM), and B= 13 ppm on DM.</p> | |
| 4.2.4 | <p>A nutrient recycling strategy is recorded, including use of Empty Fruit Bunches (EFB), land application, and palm residues after replanting.</p> <p>- Minor compliance -</p> | <p>The company applied EFB to increase the soil fertility with dosage 250 kg/palm in average. Based on Program Aplikasi EFB 2018, the plan form EFB application is 6,251,167 kg. The realization is 6,321,604 kg. Blocks applied among others D91d of Afdeling IV, Block D93d, E93a, E93b of Afdeling V.</p> <p>The palm oil mill effluent utilized as soil nutrient through land application. The POME application permit in Tungkal Ulu Estate based on "Keputusan Kepala Dinas Penanaman Modal dan Pelayanan Terpadu Satu Pintu Kabupaten Tanjung Jabung Barat" No. 503.8/O/DPM-PTSP/2017 regarding permit extension on uses of palm oil mill effluent on land area of PT Inti Indosawit Subur – Tungkal Ulu Estate, dated 16 May 2017 valid for 3 years.</p> <p>The land application approved for ±100 Ha, maximum BOD 5,000 mg/liters. The implementation of Palm Oil Mill Effluent (POME) into the plantation and monitoring wells was reported in March 2019, to the "Kepala Kantor Lingkungan Hidup Kabupaten Tanjung Jabung Barat". Land application program for Tungkal Ulu Estate up to April 2019 has been realized for 174.05 Ha, POME applied 32,635 m³. Spread in 7 blocks, comprise of Blocks A16a, A16b, A16c, A16e, A16f, A16g, A16h. Land Application program for 208 has been realised 763 Ha, POME applied 143,073 m³.</p> | Comply |

| | | | |
|---|---|--|---------------|
| | | <p>Smallholder: There is no nutrient recycling strategy implemented in smallholder area due to distance of smallholder area from the mill and the availability of the EFB and POME.</p> | |
| <p>Criterion 4.3 Practices minimise and control erosion and degradation of soils.</p> | | | |
| <p>4.3.1</p> | <p>Maps of any fragile soils shall be available. - Major compliance -</p> | <p>Estate: Soil Analysis carried out in September 2010. Reported under "Laporan Survey Tanah Semidetil Area Perkebunan Kelapa Sawit PT. Inti Indosawit Subur Kebun Tungkal Ulu". Based on the report, the physiographic location in plain with hilly tuffaceous sedimentary rocks. Lithology parent material is clay and sand. Topographic of the area is rolling to hilly. Natural fertility is low to medium. PT Inti Indosawit Subur Tungkal Ulu has "Peta Satuan Peta Tanah PT Inti Indosawit Subur Kebun Tungkal Ulu" with scale 1 : 35,000. Based on soil suitability, consist of: S2 2,357.5 Ha (47.3%) with limiting factor of low natural fertility with low pH; S3 2,200.1 Ha (44.7%) with limiting factor of topographic condition (slope 15-30%); N1 (not suitable) 391.4 Ha (8%) with limiting factor of slope more than 30%. Based on soil survey semi detail, soil classification in Tungkal Ulu Estate consist of:</p> <ul style="list-style-type: none"> - <i>Typic Dystrudepts;</i> - <i>Typic endoaquepts;</i> - <i>Typic endoaquils;</i> - <i>Typic hapludox;</i> - <i>Typic hapludults;</i> - <i>Typic kandiuults;</i> <p>Based on soil survey semi detail map and Field visit in Tungkal Ulu Estate, it can be shown that there is no fragile soil in Tungkal Ulu Estate.</p> <p>Smallholder: Group manager has kept and maintain the soil map of Plasma Tungkal Ulu in the office. There are 3 series of soil type defined by Research and Development Asian Agri based on soil survey on April 2014 and soil survey semi detail on June 1998:</p> <ul style="list-style-type: none"> - <i>Typic Dystrudepts</i> | <p>Comply</p> |

| | | | |
|-------|--|--|--------|
| | | <ul style="list-style-type: none"> - <i>Typic Kandiodults</i> - <i>Typic Hapludults</i> <p>Soil map and soil survey result recorded in "Laporan Survei Tanah Tinjau Kebun Plasma Tungkal Ulu". PT Inti Indosawit Subur Plasma Tungkal Ulu has "Peta Satuan Peta Tanah PT Inti Indosawit Subur Kebun Plasma Tungkal Ulu" with scale 1 : 70,000.</p> | |
| 4.3.2 | <p>A management strategy shall be in place for plantings on slopes above a certain limit (this needs to be soil and climate specific).</p> <p>- Minor compliance -</p> | <p>Management strategy for plantings on slopes has been implemented by organization. PT Inti Indosawit Subur - Tungkal Ulu Estate has procedure "SOP AA-APM-OP-1100.05-R3 23/11/2016 Konservasi Tanah dan Air" explains Soil & Water Conservation; has determined strategy control erosion particular in slope area, such as: 0 – 5° , 6 – 12° , 13 -20° , and more than 20°. The company has applied silt pit, L shape stacking frond and terracing in slope area to reduce erosion. In addition, company planting land cover crop to minimize soil erosion.</p> <p>In the sloping area ≥13° company has made terracing before planting. Terracing made recorded in "Program dan realisasi harian replanting". For period January – April 2019, Tungkal Ulu Estate has made 57,458 m of terrace, whilst the budget for 2019 is 195,348 m. During field visit indicated that company has made the terrace according to the procedure. Individual terrace maintenance for period January – April 2019 in Tungkal Ulu Estate was 185 unit.</p> <p>Smallholder: Kebun Plasma Tungkal Ulu has established the guidance on managing problematic soil which covered the managing on problematic area (steep terrain, lateritic soils, sandy soils) according to procedure "SOP AA-APM-OP-1100.05-R3 23/11/2016 Konservasi Tanah dan Air". Plasma Tungkal Ulu has set the "Draft Replanting" and has considered management strategy for plantings on slopes based on the procedure.</p> <p>Plasma Tungkal Ulu also has disseminated the mechanism of "U" shape frond stacking and individual terrace as in Soil and Water Conservation mechanism to smallholder member. For example dissemination on 25 March 2019 in Koperasi Manunggal Jaya, attended by 25 participants; KUD Bina Usaha on 8 January 2019, attended by 17 participants; KUD Argo Makmur on 20 February 2019 attended by 30 participants; and KUD Harapan Jaya on 21 March 2019 attended by 25 participants.</p> <p>Plasma Tungkal Ulu has applied frond stacking U shape to prevent the soil erosion. Monitoring of frond stacking has been implemented by Plasma Tungkal Ulu Management and recorded in</p> | Comply |

| | | <p>"Monitoring Penyusunan Pelepah". As evidence "Monitoring Penyusunan Pelapah" period April 2019, sample KUD Bina Usaha; Farmer Group 03; area 50 Ha; plot number 2364, 2400 and 2394.</p> <p>Plasma Tungkal Ulu has applied individual terrace as well in the slope area to minimize the soil erosion. Monitoring and maintenance of individual terrace can be demonstrated during audit as in monitoring "Pembuatan Teresan". Sampled seen in KUD Bina Usaha, Koperasi Manunggal Jaya, KUD Argo Makmur and KUD Harapan Jaya.</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|-----------------------|--|--|--------|---------------------------|--|--|--|------|--|-------------|--|-------|--------|-------|--------|-----------------------|--|--|--|--|---------|--------|--------|--------|--------|----------|--------|--------|--------|--------|-------|-------|-------|-------|-------|-------|----|-----|----|-----|--------|
| 4.3.3 | <p>A road maintenance program shall be in place.</p> <p>- Minor compliance –</p> | <p>Procedure for road maintenance has been established. Company have established road maintenance program for main road, collection road and access road by manual and mechanical maintenance. Road maintenance includes manual, grading and compacting and road hardening. Budget and realization for Road Grading and Compacting 2019 were available.</p> <p>Road maintenance program and progress was made and recorded in "Program dan Realisasi Pemeliharaan Jalan Manual, Mekanis dan Pengerasan Jalan 2019". Budget for road hardening 2019 is 41,544 m, realization up to April 2019 is 24,774 m. Budget for road hardening 2018 is 445,432 m, realization is 361,216 m.</p> <p>During field visit indicated that road condition in Tungkal Ulu Estate was well maintained.</p> <p>Smallholder: Kebun Plasma Tungkal Ulu has documented road maintenance program which approved by Smallholder Manager. The realization are documented in "Laporan Monitoring Progress Jalan". Based on the document, road maintenance progress for 2019 for sample Scheme Smallholder are as follows:</p> <table border="1" data-bbox="757 1118 1648 1388"> <thead> <tr> <th rowspan="3">Period</th> <th colspan="4">Road Maintenance 2019 (m)</th> </tr> <tr> <th colspan="2">Plan</th> <th colspan="2">Realisation</th> </tr> <tr> <th>Heavy</th> <th>Medium</th> <th>Heavy</th> <th>Medium</th> </tr> </thead> <tbody> <tr> <td colspan="5"><i>KUD Bina Usaha</i></td> </tr> <tr> <td>January</td> <td>10,000</td> <td>11,500</td> <td>10,020</td> <td>11,350</td> </tr> <tr> <td>February</td> <td>10,500</td> <td>10,100</td> <td>10,000</td> <td>10,200</td> </tr> <tr> <td>March</td> <td>4,500</td> <td>5,000</td> <td>4,300</td> <td>4,700</td> </tr> <tr> <td>April</td> <td>90</td> <td>100</td> <td>80</td> <td>110</td> </tr> </tbody> </table> | Period | Road Maintenance 2019 (m) | | | | Plan | | Realisation | | Heavy | Medium | Heavy | Medium | <i>KUD Bina Usaha</i> | | | | | January | 10,000 | 11,500 | 10,020 | 11,350 | February | 10,500 | 10,100 | 10,000 | 10,200 | March | 4,500 | 5,000 | 4,300 | 4,700 | April | 90 | 100 | 80 | 110 | Comply |
| Period | Road Maintenance 2019 (m) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Plan | | | Realisation | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Heavy | Medium | Heavy | Medium | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <i>KUD Bina Usaha</i> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| January | 10,000 | 11,500 | 10,020 | 11,350 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| February | 10,500 | 10,100 | 10,000 | 10,200 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| March | 4,500 | 5,000 | 4,300 | 4,700 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| April | 90 | 100 | 80 | 110 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--------------------------------|---|--|--------------------------------|-------|--|--|--|---------|---|-----|---|-----|----------|-----|---|---|-------|-------|---|-------|---|-------|-------|---|---|---|---|------------------------|--|--|--|--|---------|-----|-------|-----|-------|----------|-------|-------|-----|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------------------------|--|--|--|--|---------|-----|--------|-----|-------|----------|-----|-------|-----|-------|-------|-------|-------|-----|-------|-------|-------|-------|-------|-------|--|
| | | <table border="1"> <tr> <td colspan="5"><i>Koperasi Manunggal Jaya</i></td> </tr> <tr> <td>January</td> <td>-</td> <td>400</td> <td>-</td> <td>500</td> </tr> <tr> <td>February</td> <td>400</td> <td>-</td> <td>-</td> <td>2,300</td> </tr> <tr> <td>March</td> <td>-</td> <td>3,000</td> <td>-</td> <td>2,700</td> </tr> <tr> <td>April</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td colspan="5"><i>KUD Argo Makmur</i></td> </tr> <tr> <td>January</td> <td>600</td> <td>7,000</td> <td>600</td> <td>6,700</td> </tr> <tr> <td>February</td> <td>1,000</td> <td>6,500</td> <td>850</td> <td>6,210</td> </tr> <tr> <td>March</td> <td>1,000</td> <td>9,000</td> <td>1,165</td> <td>8,970</td> </tr> <tr> <td>April</td> <td>1,200</td> <td>8,600</td> <td>1,158</td> <td>8,700</td> </tr> <tr> <td colspan="5"><i>KUD Harapan Jaya</i></td> </tr> <tr> <td>January</td> <td>100</td> <td>10,000</td> <td>100</td> <td>9,000</td> </tr> <tr> <td>February</td> <td>500</td> <td>7,000</td> <td>550</td> <td>7,050</td> </tr> <tr> <td>March</td> <td>1,000</td> <td>8,000</td> <td>950</td> <td>8,050</td> </tr> <tr> <td>April</td> <td>1,500</td> <td>8,700</td> <td>1,450</td> <td>8,900</td> </tr> </table> <p>During field visit indicated that road condition in Tungkal Ulu Estate was well maintained.</p> | <i>Koperasi Manunggal Jaya</i> | | | | | January | - | 400 | - | 500 | February | 400 | - | - | 2,300 | March | - | 3,000 | - | 2,700 | April | - | - | - | - | <i>KUD Argo Makmur</i> | | | | | January | 600 | 7,000 | 600 | 6,700 | February | 1,000 | 6,500 | 850 | 6,210 | March | 1,000 | 9,000 | 1,165 | 8,970 | April | 1,200 | 8,600 | 1,158 | 8,700 | <i>KUD Harapan Jaya</i> | | | | | January | 100 | 10,000 | 100 | 9,000 | February | 500 | 7,000 | 550 | 7,050 | March | 1,000 | 8,000 | 950 | 8,050 | April | 1,500 | 8,700 | 1,450 | 8,900 | |
| <i>Koperasi Manunggal Jaya</i> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| January | - | 400 | - | 500 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| February | 400 | - | - | 2,300 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| March | - | 3,000 | - | 2,700 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| April | - | - | - | - | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <i>KUD Argo Makmur</i> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| January | 600 | 7,000 | 600 | 6,700 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| February | 1,000 | 6,500 | 850 | 6,210 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| March | 1,000 | 9,000 | 1,165 | 8,970 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| April | 1,200 | 8,600 | 1,158 | 8,700 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <i>KUD Harapan Jaya</i> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| January | 100 | 10,000 | 100 | 9,000 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| February | 500 | 7,000 | 550 | 7,050 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| March | 1,000 | 8,000 | 950 | 8,050 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| April | 1,500 | 8,700 | 1,450 | 8,900 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4.3.4 | <p>Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place.</p> <p>- Major compliance –</p> | <p>Based on the semi-detailed soil analysis, the soil type falls into loam and clay. Based on soil survey semi detail, soil classification in Tungkal Ulu Estate consist of:</p> <ul style="list-style-type: none"> - <i>Kompleks Typic Dystrudepts</i> - <i>Typic Endoaquepts</i> - <i>Typic Endoaquils</i> - <i>Typic Hapludox</i> - <i>Typic Hapludults</i> - <i>Typic Kandiudults</i> <p>There is no peat soil identified within PT. Inti Indosawit Subur – Tungkal Ulu Estate. This indicator is not applicable.</p> <p>Smallholder:</p> | N/A | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| | | | |
|-------|--|--|-----|
| | | <p>Based on soil survey performed by Asian Agri Research and Development, it was verified that there is no peat soil indicated in Tungkal Ulu Scheme Smallholder. There are 3 series of soil type defined by Research and Development Asian Agri based on soil survey on April 2014 and soil survey semi detail on June 1998:</p> <ul style="list-style-type: none"> - <i>Typic Dystrudepts</i> - <i>Typic Kandiudults</i> - <i>Typic Hapludults</i> <p>This indicator is not applicable.</p> | |
| 4.3.5 | <p>Drainability assessments shall be required prior to replanting on peat to determine the long-term viability of the necessary drainage for oil palm growing.</p> <p>- Minor compliance –</p> | <p>Based on the semi-detailed soil analysis, the soil type falls into loam and clay. Based on soil survey semi detail, soil classification in Tungkal Ulu Estate consist of:</p> <ul style="list-style-type: none"> - <i>Kompleks Typic Dystrudepts</i> - <i>Typic Endoaquepts</i> - <i>Typic Endoaquils</i> - <i>Typic Hapludox</i> - <i>Typic Hapludults</i> - <i>Typic Kandiudults</i> <p>There is no peat soil identified within PT. Inti Indosawit Subur – Tungkal Ulu Estate. This indicator is not applicable.</p> <p>Smallholders: Based on soil survey performed by Asian Agri Research and Development, it was verified that there is no peat soil indicated in Tungkal Ulu Scheme Smallholder. There are 3 series of soil type defined by Research and Development Asian Agri based on soil survey on April 2014 and soil survey semi detail on June 1998:</p> <ul style="list-style-type: none"> - <i>Typic Dystrudepts</i> - <i>Typic Kandiudults</i> - <i>Typic Hapludults</i> <p>This indicator is not applicable.</p> | N/A |

| | | | |
|---|---|---|--------|
| 4.3.6 | <p>A management strategy shall be in place for other fragile and problem soils (e.g. sandy, low organic matter, acid sulphate soils).</p> <p>- Minor compliance –</p> | <p>Based on the semi-detailed soil analysis, the soil type falls into loam and clay. Based on soil survey semi detail, soil classification in Tungkal Ulu Estate consist of:</p> <ul style="list-style-type: none"> - <i>Kompleks typic Dystrudepts</i> - <i>Typic endoaquepts</i> - <i>Typic endoaquils</i> - <i>Typic hapludox</i> - <i>Typic hapludults</i> - <i>Typic kandiudults</i> <p>There is no other fragile and problem soil identified within PT. Inti Indosawit Subur – Tungkal Ulu Estate. This indicator is not applicable.</p> <p>Smallholder: Based on soil survey performed by Asian Agri Research and Development, it was verified that there is no other fragile and problem soil indicated in Tungkal Ulu Scheme Smallholder. There are 3 series of soil type defined by Research and Development Asian Agri based on soil survey on April 2014 and soil survey semi detail on June 1998:</p> <ul style="list-style-type: none"> - <i>Typic Dystrudepts</i> - <i>Typic Kandiudults</i> - <i>Typic Hapludults</i> <p>This indicator is not applicable.</p> | N/A |
| <p>Criterion 4.4 Practices maintain the quality and availability of surface and groundwater</p> | | | |
| 4.4.1 | <p>An implemented water management plan shall be in place.</p> <p>- Minor compliance -</p> | <p>Mill and Estate: The Certificate Holder and scheme Smallholder have established water management plan, consist of management water supply for domestic, water consumption and measurement of water quality.</p> <p>In Mill scope, water consumption for FFB processing is more concern to ensure the water use is in line with budget. While in Estate scope, water quality is more preferred to prevent any pollution impact environmentally.</p> | Comply |

| | | <p>Smallholder: For Smallholder, water management applied is focused on protection of riparian zone. The activity is only maintained the riparian zone from pesticides application.</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--------------|---|---|------------------------|--------------------------|------------------------|--------------------------|--|--|--|------------------------|--------------------------|------------------------|--------------------------|-----|------|-------|-----|-----|-----|-----|-----|------|-----|----|----|-----|-----|----|--|-------|-----|-----|-----|-----|-----|------|---|------|------|------|------|-----|------|----|------|------|------|------|-----------|------|-----------------|--------|--|--|--|------------------------|--------------------------|------------------------|--------------------------|-----|------|-------|-----|-----|-----|-----|-----|------|-----|----|-----|-----|-----|----|--|-------|-----|-----|-----|-----|-----|------|---|------|------|------|------|-----|------|----|------|------|------|------|---------------|
| <p>4.4.2</p> | <p>Protection of water courses and wetlands, including securing and maintaining appropriate riparian and other buffer zones, at the time of or prior to replanting shall be demonstrated.</p> <p>- Major compliance -</p> | <p>Estate: As a commitment to protect of watercourse, the Certificate Holder conducting water analysis on surface water. There are two (2) natural small river across the plantation, namely Benanak River and Lampisi River. Water analysis conducted twice a year as per regulation required to monitor whether or not pollution to watercourses. Report of analysis which performed by SUCOFINDO as an accredited laboratory, as follow: Sample taken: 30th May 2018.</p> <table border="1" data-bbox="757 687 1816 976"> <thead> <tr> <th rowspan="2">Parameter</th> <th rowspan="2">Unit</th> <th rowspan="2">Threshold Value</th> <th colspan="4">Result</th> </tr> <tr> <th>Benanak River upstream</th> <th>Benanak River downstream</th> <th>Lampisi River upstream</th> <th>Lampisi River downstream</th> </tr> </thead> <tbody> <tr> <td>TDS</td> <td>mg/L</td> <td>2,000</td> <td>256</td> <td>270</td> <td>286</td> <td>292</td> </tr> <tr> <td>TSS</td> <td>mg/L</td> <td>400</td> <td>82</td> <td>92</td> <td>126</td> <td>145</td> </tr> <tr> <td>pH</td> <td></td> <td>6 – 9</td> <td>6.3</td> <td>6.4</td> <td>6.4</td> <td>6.3</td> </tr> <tr> <td>BOD</td> <td>mg/L</td> <td>3</td> <td>7.20</td> <td>7.68</td> <td>8.40</td> <td>9.26</td> </tr> <tr> <td>COD</td> <td>mg/L</td> <td>25</td> <td>16.5</td> <td>18.2</td> <td>20.8</td> <td>22.5</td> </tr> </tbody> </table> <p>Sample taken: 23rd November 2018.</p> <table border="1" data-bbox="757 1042 1816 1331"> <thead> <tr> <th rowspan="2">Parameter</th> <th rowspan="2">Unit</th> <th rowspan="2">Threshold Value</th> <th colspan="4">Result</th> </tr> <tr> <th>Benanak River upstream</th> <th>Benanak River downstream</th> <th>Lampisi River upstream</th> <th>Lampisi River downstream</th> </tr> </thead> <tbody> <tr> <td>TDS</td> <td>mg/L</td> <td>2,000</td> <td>262</td> <td>284</td> <td>285</td> <td>292</td> </tr> <tr> <td>TSS</td> <td>mg/L</td> <td>400</td> <td>96</td> <td>108</td> <td>126</td> <td>145</td> </tr> <tr> <td>pH</td> <td></td> <td>6 – 9</td> <td>6.4</td> <td>6.3</td> <td>6.4</td> <td>6.3</td> </tr> <tr> <td>BOD</td> <td>mg/L</td> <td>3</td> <td>8.22</td> <td>8.65</td> <td>8.40</td> <td>9.26</td> </tr> <tr> <td>COD</td> <td>mg/L</td> <td>25</td> <td>14.6</td> <td>16.2</td> <td>20.8</td> <td>22.5</td> </tr> </tbody> </table> | Parameter | Unit | Threshold Value | Result | | | | Benanak River upstream | Benanak River downstream | Lampisi River upstream | Lampisi River downstream | TDS | mg/L | 2,000 | 256 | 270 | 286 | 292 | TSS | mg/L | 400 | 82 | 92 | 126 | 145 | pH | | 6 – 9 | 6.3 | 6.4 | 6.4 | 6.3 | BOD | mg/L | 3 | 7.20 | 7.68 | 8.40 | 9.26 | COD | mg/L | 25 | 16.5 | 18.2 | 20.8 | 22.5 | Parameter | Unit | Threshold Value | Result | | | | Benanak River upstream | Benanak River downstream | Lampisi River upstream | Lampisi River downstream | TDS | mg/L | 2,000 | 262 | 284 | 285 | 292 | TSS | mg/L | 400 | 96 | 108 | 126 | 145 | pH | | 6 – 9 | 6.4 | 6.3 | 6.4 | 6.3 | BOD | mg/L | 3 | 8.22 | 8.65 | 8.40 | 9.26 | COD | mg/L | 25 | 14.6 | 16.2 | 20.8 | 22.5 | <p>Comply</p> |
| Parameter | Unit | Threshold Value | | | | Result | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | Benanak River upstream | Benanak River downstream | Lampisi River upstream | Lampisi River downstream | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| TDS | mg/L | 2,000 | 256 | 270 | 286 | 292 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| TSS | mg/L | 400 | 82 | 92 | 126 | 145 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| pH | | 6 – 9 | 6.3 | 6.4 | 6.4 | 6.3 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| BOD | mg/L | 3 | 7.20 | 7.68 | 8.40 | 9.26 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| COD | mg/L | 25 | 16.5 | 18.2 | 20.8 | 22.5 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Parameter | Unit | Threshold Value | Result | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | Benanak River upstream | Benanak River downstream | Lampisi River upstream | Lampisi River downstream | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| TDS | mg/L | 2,000 | 262 | 284 | 285 | 292 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| TSS | mg/L | 400 | 96 | 108 | 126 | 145 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| pH | | 6 – 9 | 6.4 | 6.3 | 6.4 | 6.3 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| BOD | mg/L | 3 | 8.22 | 8.65 | 8.40 | 9.26 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| COD | mg/L | 25 | 14.6 | 16.2 | 20.8 | 22.5 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| | | <p>Also, the certificate holder has procedure to protect riparian zone and describe within "SOP Pengelolaan Riparian (AA-APM-OP-1100.21-R2)", dated 7 December 2015.</p> <p>During field observation at riparian zone (HCV) in replanting area, condition of natural waterways or riparian zone is maintained.</p> <p>Smallholder: Based on field visit to 76 sample plots of Smallholder, there is no riparian zone found.</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|-------|--|--|------------------|-------|---------------------|------------------|-----|---------------------|---|--------|------|-------|-------|-------|---|--------|------|-----|-------|---|--------|------|-------|-------|---|--------|------|-------|-------|---|--------|------|-------|-------|---|--------|------|-------|-------|---|--------|------|-------|-------|---|--------|------|-------|-------|---|--------|------|-------|-------|----|--------|------|-------|-------|--------|
| 4.4.3 | <p>Records for monitoring of effluent especially BOD (Biochemical Oxygen Demand) and efforts to comply with legal requirements, shall be available (see criteria 2.1 and 5.6).</p> <p>- Minor compliance –</p> | <p>Estate: Effluent from Tungkal Ulu Mill applied to plantation area as Land Application. The certificate holder has a license for Land Application with No: 503.08/01/DPM-PTSP/2017" dated 16 May 2017 valid until 3 years. (SK Kepala Dinas Penanaman Modal dan Pelayangan Terpadu Satu Pintu Kabupaten Tanjung Jabung Barat).</p> <p>Mill: Monitoring of effluent conducted in monthly period. BOD Analysis performed by DLH UPTD Lab. Lingkungan Daerah PemProv. Jambi, accredited by KAN LP-413-IDN.</p> <table border="1" data-bbox="757 944 1514 1342"> <thead> <tr> <th>No</th> <th>Month</th> <th>pH</th> <th>BOD₅</th> <th>COD</th> <th>BOD Threshold Value</th> </tr> </thead> <tbody> <tr><td>1</td><td>Jul-18</td><td>7.55</td><td>4,830</td><td>8,240</td><td rowspan="10">5,000</td></tr> <tr><td>2</td><td>Aug-18</td><td>8.05</td><td>600</td><td>1,728</td></tr> <tr><td>3</td><td>Sep-18</td><td>5.81</td><td>1,005</td><td>3,336</td></tr> <tr><td>4</td><td>Oct-18</td><td>7.45</td><td>3,220</td><td>6,720</td></tr> <tr><td>5</td><td>Nov-18</td><td>7.86</td><td>1,692</td><td>3,142</td></tr> <tr><td>6</td><td>Dec-18</td><td>8.27</td><td>1,446</td><td>2,648</td></tr> <tr><td>7</td><td>Jan-19</td><td>8.23</td><td>1,205</td><td>2,060</td></tr> <tr><td>8</td><td>Feb-19</td><td>8.21</td><td>1,206</td><td>2,265</td></tr> <tr><td>9</td><td>Mar-19</td><td>7.50</td><td>1,205</td><td>2,204</td></tr> <tr><td>10</td><td>Apr-19</td><td>6.60</td><td>1,005</td><td>1,353</td></tr> </tbody> </table> | No | Month | pH | BOD ₅ | COD | BOD Threshold Value | 1 | Jul-18 | 7.55 | 4,830 | 8,240 | 5,000 | 2 | Aug-18 | 8.05 | 600 | 1,728 | 3 | Sep-18 | 5.81 | 1,005 | 3,336 | 4 | Oct-18 | 7.45 | 3,220 | 6,720 | 5 | Nov-18 | 7.86 | 1,692 | 3,142 | 6 | Dec-18 | 8.27 | 1,446 | 2,648 | 7 | Jan-19 | 8.23 | 1,205 | 2,060 | 8 | Feb-19 | 8.21 | 1,206 | 2,265 | 9 | Mar-19 | 7.50 | 1,205 | 2,204 | 10 | Apr-19 | 6.60 | 1,005 | 1,353 | Comply |
| No | Month | pH | BOD ₅ | COD | BOD Threshold Value | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1 | Jul-18 | 7.55 | 4,830 | 8,240 | 5,000 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2 | Aug-18 | 8.05 | 600 | 1,728 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3 | Sep-18 | 5.81 | 1,005 | 3,336 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4 | Oct-18 | 7.45 | 3,220 | 6,720 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 5 | Nov-18 | 7.86 | 1,692 | 3,142 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 6 | Dec-18 | 8.27 | 1,446 | 2,648 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 7 | Jan-19 | 8.23 | 1,205 | 2,060 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 8 | Feb-19 | 8.21 | 1,206 | 2,265 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 9 | Mar-19 | 7.50 | 1,205 | 2,204 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 10 | Apr-19 | 6.60 | 1,005 | 1,353 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| | | <p>Smallholder: Based on field visit to 76 sample plots of Smallholder, there is no riparian zone found.</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|--|---|-------------------|--------------------|------------------|-------------------|--------------------|--------|--------|--------|------|------|--------|--------|--------|------|------|--------|--------|--------|------|------|--------|--------|--------|------|------|--------|--------|--------|------|------|--------|--------|--------|------|------|--------|--------|--------|------|------|--------|--------|--------|------|------|--------|--------|--------|------|------|--------|--------|--------|------|------|--------|--------|--------|------|------|--------|--------|--------|------|------|--------|
| 4.4.4 | <p>Monitoring of mill water use per ton of FFB shall be recorded. - Minor compliance –</p> | <p>Mill: Record of water usage on FFB processed period May2018 – Apr2019 as follow:</p> <table border="1"> <thead> <tr> <th>Month</th> <th>FFB Process (MT)</th> <th>Water Usage (m3)</th> <th>Usage (m3/MT FFB)</th> <th>Budget (m3/MT FFB)</th> </tr> </thead> <tbody> <tr><td>May-18</td><td>26,149</td><td>26,322</td><td>1.01</td><td>1.00</td></tr> <tr><td>Jun-18</td><td>26,054</td><td>26,611</td><td>1.02</td><td>1.00</td></tr> <tr><td>Jul-18</td><td>33,336</td><td>31,322</td><td>0.94</td><td>1.00</td></tr> <tr><td>Aug-18</td><td>32,354</td><td>29,694</td><td>0.92</td><td>1.00</td></tr> <tr><td>Sep-18</td><td>32,862</td><td>30,455</td><td>0.93</td><td>1.00</td></tr> <tr><td>Oct-18</td><td>32,032</td><td>30,174</td><td>0.94</td><td>1.00</td></tr> <tr><td>Nov-18</td><td>29,512</td><td>26,455</td><td>0.90</td><td>1.00</td></tr> <tr><td>Dec-18</td><td>27,200</td><td>24,622</td><td>0.91</td><td>1.00</td></tr> <tr><td>Jan-19</td><td>22,352</td><td>23,427</td><td>1.05</td><td>1.00</td></tr> <tr><td>Feb-19</td><td>17,778</td><td>15,641</td><td>0.88</td><td>1.00</td></tr> <tr><td>Mar-19</td><td>17,727</td><td>16,755</td><td>0.95</td><td>1.00</td></tr> <tr><td>Apr-19</td><td>17,446</td><td>19,927</td><td>1.14</td><td>1.00</td></tr> </tbody> </table> <p>Smallholder: Not Applicable</p> | Month | FFB Process (MT) | Water Usage (m3) | Usage (m3/MT FFB) | Budget (m3/MT FFB) | May-18 | 26,149 | 26,322 | 1.01 | 1.00 | Jun-18 | 26,054 | 26,611 | 1.02 | 1.00 | Jul-18 | 33,336 | 31,322 | 0.94 | 1.00 | Aug-18 | 32,354 | 29,694 | 0.92 | 1.00 | Sep-18 | 32,862 | 30,455 | 0.93 | 1.00 | Oct-18 | 32,032 | 30,174 | 0.94 | 1.00 | Nov-18 | 29,512 | 26,455 | 0.90 | 1.00 | Dec-18 | 27,200 | 24,622 | 0.91 | 1.00 | Jan-19 | 22,352 | 23,427 | 1.05 | 1.00 | Feb-19 | 17,778 | 15,641 | 0.88 | 1.00 | Mar-19 | 17,727 | 16,755 | 0.95 | 1.00 | Apr-19 | 17,446 | 19,927 | 1.14 | 1.00 | Comply |
| Month | FFB Process (MT) | Water Usage (m3) | Usage (m3/MT FFB) | Budget (m3/MT FFB) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| May-18 | 26,149 | 26,322 | 1.01 | 1.00 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Jun-18 | 26,054 | 26,611 | 1.02 | 1.00 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Jul-18 | 33,336 | 31,322 | 0.94 | 1.00 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Aug-18 | 32,354 | 29,694 | 0.92 | 1.00 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Sep-18 | 32,862 | 30,455 | 0.93 | 1.00 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Oct-18 | 32,032 | 30,174 | 0.94 | 1.00 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Nov-18 | 29,512 | 26,455 | 0.90 | 1.00 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Dec-18 | 27,200 | 24,622 | 0.91 | 1.00 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Jan-19 | 22,352 | 23,427 | 1.05 | 1.00 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Feb-19 | 17,778 | 15,641 | 0.88 | 1.00 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Mar-19 | 17,727 | 16,755 | 0.95 | 1.00 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Apr-19 | 17,446 | 19,927 | 1.14 | 1.00 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>Criterion 4.5 Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate integrated Pest Management (IPM) techniques.</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4.5.1 | <p>Monitoring of Integrated Pest Management (IPM) plan implementation shall be available.</p> | <p>Estate: Integrated Pest Management Plan has been developed and documented by PT Inti Indosawit Subur – Tungkal Ulu Estate. IPM Plan has been prepared within annual budget 2019. Tungkal Ulu Estate established Division Work Program annually for IPM for each Division/Afdeling. IPM plan includes</p> | Comply | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

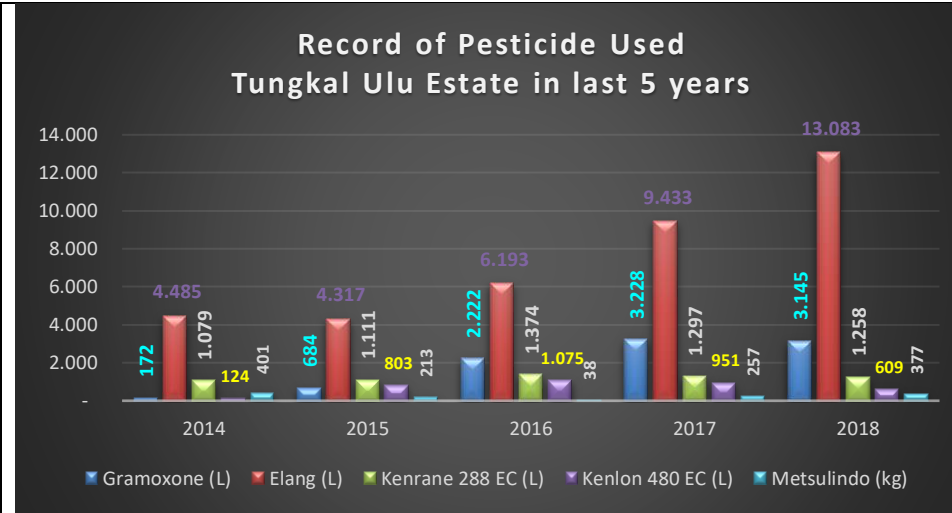
| | | | |
|--|-----------------------------|--|--|
| | <p>- Major compliance -</p> | <p>detection and census of pest and diseases, weeds controlling, planting and upkeep of beneficial plant, use of pesticide and herbicide.</p> <p>IPM plan include the following:</p> <ul style="list-style-type: none"> - Identification of potential pests and thresholds - The techniques used (cultural, biological, mechanical and physical methods) - The native species used as part of the biological control method - Reducing the use of chemicals over a period of time - Prophylactic use of pesticides - Minimization of pesticide use - Review on the plans to suit the present condition such as replanting <p>Company has establish the SOPs for IPM, e.g.:</p> <ul style="list-style-type: none"> - SOP AA-APM-OP-1100.08-R6, dated 11 May 2016, Pengendalian Gulma or Weed control; - SOP AA-APM-OP-1100.10. R6, dated 23 November 2016, Pengendalian Hama dan Penyakit explains Pests and Disease Control; - SOP AA-APM-OP-1100.14. R3, 16 February 2017, Sensus dan Identifikasi Pokok explains census and palm identification; <p>The SOP describes integrated pest control (integrated pest management/IPM) which combines various control techniques e.g. mechanical, biological, physical and chemical, applied early warning system (EWS) through periodically census for pests by:</p> <ul style="list-style-type: none"> - Visual observation (visual plant e.g. leafs or broken stems and fruit rot) - Conducting a census (to determine the distribution and level of attack) - Control (manual, biological or chemical) e.g planting Turnera Subulatta (nest of natural caterpillars predator). - Census of evaluation (to see the effect of control). <p>Several records of pest occurrence and control verified such as:</p> <ul style="list-style-type: none"> - "Rekap Sensus Hama Pemakan Daun Kebun Tungkal Ulu Periode April 2019" total caterpillar attack in Afdeling II – VII was 27 ha with number of caterpillar 1 – 5 per frond in 27 palm tree and the attack level is 0.94% and still under threshold 5%. | |
|--|-----------------------------|--|--|

| | | | |
|--|--|--|--|
| | | <ul style="list-style-type: none"> - Rats and Thirataba attack performed each quarter and recorded in "Rekapitulasi Serangan Tikus dan Thirataba". Latest monitoring performed in March 2019, based on result of monitoring, there were 52 palm tree attack by rats with level 0.26% and still under threshold 5%. - Data Burung Hantu Periode April 2019, in Afdeling I total Tyto alba nest 16 with number of Tyto alba 2 individual and 11 imature tyto alba and 10 egg; Afdeling II total nest 13 with number of Tyto alba 2 and immature Tyto alba 8 individu and 14 egg. - The beneficial plant that planted are Turnera subulata planted in the collection and the main road, Antigonon leptopus planted in every corner of the main road intersections and road collection, Casia cobanensis planted alternately with Turnera in Collection Road and Main Road. Evidence of planting and upkeep was sighted and the field observations demonstrated that it all well maintained. <p>Smallholder: The justification of pesticide used in Tungkal Ulu Smallholder is explained under company procedure. Management of Tungkal Ulu Smallholder shows "SOP Pengendalian Gulma No.AA-APM-OP-11100.08- R1" dated 01/11/2008. Chapter IV explains the weed control program for woody, grass, fern, caladium, wild banana (Musa spp), and Asystasia. It does explain active ingredients use to control such weed, dosage per application, type of nozzle used and volume of spraying per application.</p> <p>Procedure of "Panduan Pelaksanaan Pengendalian Hama dan Penyakit", no. AA-Plasma-PP KS-02. The Smallholder management has conducted monitoring of the pest control periodically in regular basis, for example:</p> <ul style="list-style-type: none"> - "Rekapitulasi Sensus Hama Pemakan Daun Kebun Plasma Tungkal Ulu" period April 2019, Afdeling II (SP 3 and SP 4), covering 1,978 ha of smallholder area, leaf eater caterpillar was detected in SP 4 with 1 – 5 individual per frond in area of 7 ha or 0.86% attack, it was under the threshold ($\geq 5\%$). - "Sensus Kandang Burung Hantu" period April 2019, described census result of barn-owl and barn-owl box of Tungkal Ulu Plasma, sample seen: KUD Bina Usaha number of Tyto alba nest 35, number of mature Tyto alba 33 individu, number of young Tyto alba 27 and 26 egg. In Kopersi Manunggal Jaya number of Tyto alba nest 31, number of mature Tyto alba 41 individu, number of young Tyto alba 17 and number of egg 45 pcs. In KUD Argo Makmur number of Tyto | |
|--|--|--|--|

| | | | |
|-------|--|---|--------|
| | | <p>alba nest 27, number of mature Tyto alba 18 individu, number of young Tyto alba 13 and 28 of egg.</p> <ul style="list-style-type: none"> - Rats attack census by FFB crat in TPH. The census performed during FFB grading and weighing in TPH (FFB collecting place) and recorded in "Monitoring Sortasi Lapangan dan Timbang TPH". Sample seen at KUD Bina Usaha Period 9 April 2019, based on grading result there is rats attack 29 FFB bunch from total FFB 384 FFB bunch or 7.5% and still under threshold 20%. - "Data Rencana dan Realisasi Penanaman Cassia tora 2019". Sample seen in KUD Bina Usaha total realization of cassia tora planting was 1,125 plants; in Koperasi Manunggal Jaya total realization of cassia tora planting was 225 ha; In KUD Argo Makmur total realization of cassia tora planting was 118 plants, and in KUD Harapan Jaya was 650 plants. | |
| 4.5.2 | <p>Training records of Integrated Pest Management (IPM) shall be available.</p> <ul style="list-style-type: none"> - Minor compliance – | <p>Estate: Refreshment training of Integrated Pest Management is conducted annually. Latest refreshment training of Integrated Pest Management to IPM workers has been performed in 23 March 2019, whilst previous training performed on June 2018. Training conducted by internal Assistant and Managers. Records of training were evidenced, e.g. attendance list, photograph and training module. Personnel interviewed during field observation were verified has received training of IPM.</p> <p>Smallholder: Tungkal Ulu Smallholder management has conducted training to smallholder member annually related integrated pest management. Farmer members have participated in training related to integrated pest control, for example:</p> <ul style="list-style-type: none"> - Refreshment training on integrated pest management at KUD Bina Usaha on 26 March 2019 attended by 18 participants (head of KT). - Refreshment training on integrated pest management at KUD Harapan Jaya on 17 January 2019 attended by 21 participants (head of KT and member). - Refreshment training on integrated pest management at KUD Manunggal Jaya on 2 April 2019 attended by 7 participants (head of KT). - Refreshment training on integrated pest management at KUD Argo Makmur on 5 March 2019 attended by 23 participants (head of KT and member). | Comply |

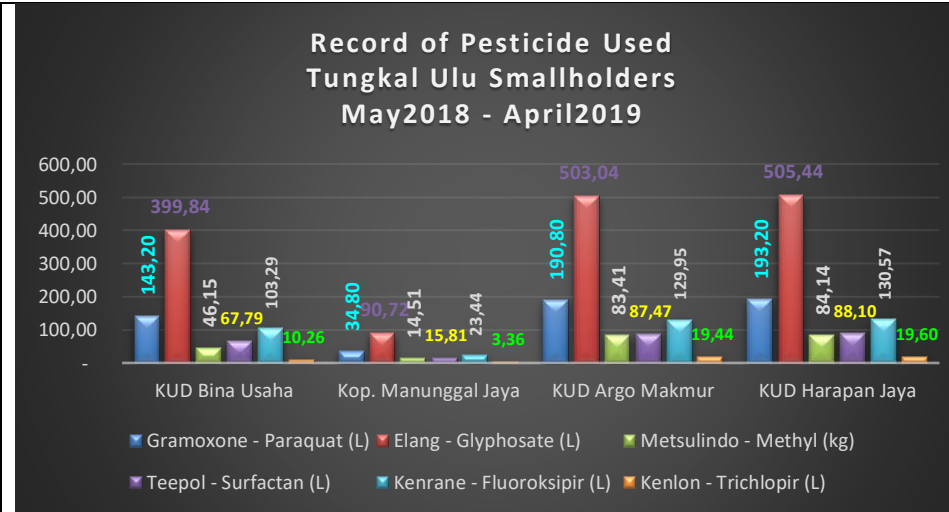
| | | | |
|--|--|---|---------------|
| | | <p>Training material and attendance list were available. Training material covers type of pest, goal of IPM, mechanism of monitoring and control, type of oil palm disease and control of disease.</p> | |
| <p>Criterion 4.6 Pesticides are used in ways that do not endanger health or the environment.</p> | | | |
| <p>4.6.1</p> | <p>Documented evidence shall be available to show that pesticide used based on regulations and the use of pesticide is specific to target species with appropriate dosage which have minimal impact on non-target species.</p> <p>- Major compliance -</p> | <p>Estate: The justification of pesticide used in PT Inti Indosawit Subur – Tungkal Ulu Estate is explained under company procedure. PT Inti Indosawit Subur – Muara Bulilan Estate shows "SOP Pengendalian Gulma No.AA-APM-OP-11100.08-R1" dated 01/11/2008. Chapter IV explains the weed control program for woody, grass, fern, caladium, wild banana (<i>Musa spp</i>), <i>Asystasia</i>. It does explain active ingredients use to control such weed, dosage per application, type of nozzle used and volume of spraying per application.</p> <p>Chapter V explains selection of pesticide and its active ingredients content, nature of the pesticide and target species. Chapter VII describes calculation of actual area implemented per hectare plantation (spray factor), spraying rotation and spraying output. Interview with herbicide sprayer noted that spraying worker understood the target species and active ingredients to control them. Spraying workers shows knowledge on minimizing chemical impact on beneficial weed.</p> <p>Agrochemicals have been applied and handled by trained spraying workers who have received usage of limited pesticide training. Training for limited pesticides uses was delivered by Pesticide Commission of Agriculture Department Jambi Province incorporated with agrochemical manufacturer on 08 May 2018. Latest raining located in PT Dasa Anugrah Sejati, attended by all spraying worker including from Tungkal Ulu Plasma and other estates under Asian Agri Group. Training record and certificates were sighted for all sprayers, e.g. Mr. SPD (certificate number 10/KP3/VIII/2015), Mrs. SMY (certificate number 21/KP3/XI/2014) and Mrs. NGT (certificate number 10/KP3/VIII/2015). It is evidence that training has been conducted in an appropriate language (Bahasa Indonesia) and understood by the workers.</p> <p>Pesticides are always applied in accordance with the product label and storage instruction. Agrochemicals storage was locked areas with limited access. The storage was ventilated. MSDS and</p> | <p>Comply</p> |

| | | | |
|-------|--|---|--------|
| | | <p>hazard symbol label were provided nearby of agrochemicals. Emergency shower and eyewash were also provided to anticipate in case of an emergency of agrochemical handling. The possible spill was managed. Secondary containment was provided around the chemical storage area. Spill kit was also provided in the area.</p> <p>Interview with spraying workers demonstrated that all of them have a good knowledge regarding pesticide usage and its material usage and toxicity. PPE for handling of chemicals were provided including boots, apron, safety glass, respiratory mask and hand gloves. PPE used was appropriate according to recommendations in any risk assessments. PPE provided and used can be easily replaced if damaged. All precautions attached to the products properly observed, applied, and understood by workers. Mandor (Foreman) as person in charge to check the workers usage of appropriate PPEs was well monitored in each spraying job.</p> <p>Smallholder: Smallholder member of Tungkal Ulu Scheme Smallholder were not directly conducted pesticide application and handling. Spraying works (pesticide application) in smallholder area were performed by spraying team called TUS from PT Inti Indosawit Subur – Tungkal Ulu Estate.</p> <p>Based on field observation in KUD Bina Usaha, Plot/Kav. #2431 (Mujio), auditor found that neighbour plot/kav. No. 2433 owned by Ms. Ana S, sighted that plot/kavling is blanket spraying. Therefore, it is re-founded that pesticides are not used on specific species target in Smallholder plot/kavling. This is Not Comply.</p> | |
| 4.6.2 | <p>Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per Ha and number of applications) shall be available. - Major compliance -</p> | <p>Estate: Record of pesticide use in Tungkal Ulu Estate for last 5 year (2013 – 2018) are as follow:</p> | Comply |



| No | Brand | Active Ingredients | LD 50 (kg) | LD50/Ha |
|----|----------------------|---------------------|------------|----------|
| 1 | Gramoxone | Paraquat dichloride | 0.6 | 0.000103 |
| 2 | Elang | Glyphosate | 1.3 | 0.000019 |
| 3 | Kenrane 288 EC | Fluroksipir | 5 | 0.000074 |
| 4 | Garlon/Kenlon 480 EC | Trichlopir | 6.5 | 0.003382 |
| 5 | Metsulindo | Metil Metsulfuron | 5 | 0.001247 |
| 6 | Solusi 865 SL | 24-Diamine | 6 | 0.027027 |

Smallholder:



KUD Bina Usaha

| No | Brand | Active Ingredients | LD 50 (kg) | LD50/Ha |
|----|----------------------|---------------------|------------|---------|
| 1 | Gramoxone | Paraquat dichloride | 0.612 | 0.11 |
| 2 | Elang | Glyphosate | 5 | 2.47 |
| 3 | Kenrane 288 EC | Fluroksipir | 5 | 0.64 |
| 4 | Garlon/Kenlon 480 EC | Trichlopir | 2 | 0.03 |
| 5 | Metsulindo | Metil Metsulfuron | 5 | 0.28 |
| 6 | Teepol | Surfaktan | 1.25 | 0.10 |

KUD Manunggal Jaya

| No | Brand | Active Ingredients | LD 50 (kg) | LD50/Ha |
|----|----------------------|---------------------|------------|---------|
| 1 | Gramoxone | Paraquat dichloride | 0.612 | 0.10 |
| 2 | Elang | Glyphosate | 5 | 2.18 |
| 3 | Kenrane 288 EC | Fluroksipir | 5 | 0.56 |
| 4 | Garlon/Kenlon 480 EC | Trichlopir | 2 | 0.03 |
| 5 | Metsulindo | Metil Metsulfuron | 5 | 0.35 |
| 6 | Teepol | Surfaktan | 1.25 | 0.10 |

KUD Argo Makmur

| No | Brand | Active Ingredients | LD 50 (kg) | LD50/Ha |
|----|----------------------|---------------------|------------|---------|
| 1 | Gramoxone | Paraquat dichloride | 0.612 | 0.10 |
| 2 | Elang | Glyphosate | 5 | 2.23 |
| 3 | Kenrane 288 EC | Fluroksipir | 5 | 0.58 |
| 4 | Garlon/Kenlon 480 EC | Trichlopir | 2 | 0.03 |
| 5 | Metsulindo | Metil Metsulfuron | 5 | 0.37 |
| 6 | Teepol | Surfaktan | 1.25 | 0.10 |

KUD Harapan Jaya

| No | Brand | Active Ingredients | LD 50 (kg) | LD50/Ha |
|----|----------------|---------------------|------------|---------|
| 1 | Gramoxone | Paraquat dichloride | 0.612 | 0.10 |
| 2 | Elang | Glyphosate | 5 | 2.24 |
| 3 | Kenrane 288 EC | Fluroksipir | 5 | 0.58 |

| | | | | | | | | | | | | | | | | | | |
|-------|--|---|-----------------------------------|----------------------|------------|---|------|---|------------|-------------------|---|------|---|--------|-----------|------|------|--|
| | | <table border="1"> <tr> <td>4</td> <td>Garlon/Kenlon 480 EC</td> <td>Trichlopir</td> <td>2</td> <td>0.03</td> </tr> <tr> <td>5</td> <td>Metsulindo</td> <td>Metil Metsulfuron</td> <td>5</td> <td>0.37</td> </tr> <tr> <td>6</td> <td>Teepol</td> <td>Surfaktan</td> <td>1.25</td> <td>0.10</td> </tr> </table> | 4 | Garlon/Kenlon 480 EC | Trichlopir | 2 | 0.03 | 5 | Metsulindo | Metil Metsulfuron | 5 | 0.37 | 6 | Teepol | Surfaktan | 1.25 | 0.10 | |
| 4 | Garlon/Kenlon 480 EC | Trichlopir | 2 | 0.03 | | | | | | | | | | | | | | |
| 5 | Metsulindo | Metil Metsulfuron | 5 | 0.37 | | | | | | | | | | | | | | |
| 6 | Teepol | Surfaktan | 1.25 | 0.10 | | | | | | | | | | | | | | |
| 4.6.3 | <p>Any use of pesticides shall be minimized as part of a plan, and in accordance with Integrated Pest Management (IPM) plans. There shall be no prophylactic use of pesticides, except in specific situations identified in Indonesia Best Practice guidelines.</p> <p>- Major compliance -</p> | <p>Estate and Smallholder:</p> <p>There were records showing that the use of pesticides have been minimized in accordance with Integrated Pest Management (IPM) plan. Use of pesticides in the field was lower than the planned budget. It also shows the company's commitment to always reduce pesticide usage and give priority to the prevention of mechanical, biological and integrated pest management. There was no prophylactic use of pesticides, it is evident by site visit and field observation in Tungkal Ulu Estate and Smallholder. Pesticide only used and apply for weeds and pest.</p> | Comply | | | | | | | | | | | | | | | |
| 4.6.4 | <p>The evidence shall be available to demonstrate that use of Pesticides, categorized in Class 1A or 1B by World Health Organization, or those are listed in the Stockholm and Rotterdam Conventions, and paraquat are not used, except in specific situations identified in national Best Practice guidelines. The use of such pesticides shall be minimized and eliminated as part of a plan, and shall only be used in exceptional circumstances.</p> <p>- Minor compliance -</p> | <p>Estate and Smallholder:</p> <p>The Certificate Holder have a complete listing of WHO class 1A, class 1B, and Stockholm or Rotterdam Conventions pesticide. It was well documented in Estate office. Paraquat is not banned in Indonesia according Act No.12/1992 regarding plant cultivation system, article 60 (g) jo. Article 38, and Ministry of Agriculture regulation No.107/Permentan/SR.140/9/2014 regarding pesticides supervisor. National regulation mentioned that paraquat dichloride is a restricted active ingredient so that its user must hold a certificate use of limited pesticides and the manufacturer must train first for the user of the pesticide.</p> <p>Minor Nonconformities:</p> <p>According to historical record of Paraquat used in last 5 years (2014 – 2018), the Certificate Holder has no commitment and effort to minimizing and eliminating of Paraquat used. It can be described as below graphic:</p> | Not Comply (1761451-201905-N2) | | | | | | | | | | | | | | | |

| | | <table border="1"> <caption>Record of Paraquat Used in last 5 years</caption> <thead> <tr> <th>Year</th> <th>Tungkal Ulu Estate (L)</th> <th>Tungkal Ulu Smallholders (L)</th> </tr> </thead> <tbody> <tr> <td>2014</td> <td>172</td> <td>2.648,2</td> </tr> <tr> <td>2015</td> <td>684</td> <td>2.604,6</td> </tr> <tr> <td>2016</td> <td>2.325,5</td> <td>2.222</td> </tr> <tr> <td>2017</td> <td>3.228</td> <td>2.093,0</td> </tr> <tr> <td>2018</td> <td>3.145</td> <td>2.047,0</td> </tr> </tbody> </table> | Year | Tungkal Ulu Estate (L) | Tungkal Ulu Smallholders (L) | 2014 | 172 | 2.648,2 | 2015 | 684 | 2.604,6 | 2016 | 2.325,5 | 2.222 | 2017 | 3.228 | 2.093,0 | 2018 | 3.145 | 2.047,0 | <p>There is no plan and effort that Paraquat used are minimize and eliminated by Certificate Holder.</p> |
|--------------|--|---|---------------|------------------------|------------------------------|------|-----|---------|------|-----|---------|------|---------|-------|------|-------|---------|------|-------|---------|--|
| Year | Tungkal Ulu Estate (L) | Tungkal Ulu Smallholders (L) | | | | | | | | | | | | | | | | | | | |
| 2014 | 172 | 2.648,2 | | | | | | | | | | | | | | | | | | | |
| 2015 | 684 | 2.604,6 | | | | | | | | | | | | | | | | | | | |
| 2016 | 2.325,5 | 2.222 | | | | | | | | | | | | | | | | | | | |
| 2017 | 3.228 | 2.093,0 | | | | | | | | | | | | | | | | | | | |
| 2018 | 3.145 | 2.047,0 | | | | | | | | | | | | | | | | | | | |
| <p>4.6.5</p> | <p>Evidence of pesticide application by trained person and in accordance with application guidelines in product label and storage guidelines shall be available. Appropriate safety equipment shall be provided and utilized. All precautions attached to the products shall be properly observed, applied, and understood by workers (see Criterion 4.7).</p> <p>- Major compliance -</p> | <p>Estate: During interview with 4 female and 1 male sprayers in Block E93a Div. 5, activity is spraying of Glyphosate. All the sprayers' operator that interview onsite already trained and having certificate of pesticide used. This certificate issued from Pesticide and Fertilizer Monitoring Commission "Komisi Pengawasan Pupuk dan Pestisida", Jambi Province.</p> <ul style="list-style-type: none"> - Sapriadi (Foreman): Cert. No. 10/KP3/VIII/2015, dated 28 August 2015. - Susana: Cert. No. 09/KP3/V/2018, dated 9 May 2018. - Rina Asmara: Cert. No. 10/KP3/VIII/2015, dated 28 August 2015. - Sumiatmy: Cert. No. 21/KP3/XI/2014, dated 27 November 2014. - Opi Dahlisa: Cert. No. 09/KP3/V/2018, dated 9 May 2018. <p>Appropriate PPE utilized during its activities and they are understood all precautions of the pesticide used.</p> | <p>Comply</p> | | | | | | | | | | | | | | | | | | |

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| | | <p>Smallholder: Based on field observation at Smallholder plot, no spraying activities conducted. However, auditor make an interview with Smallholder sample that spraying activities conducted by trained person of pesticide applicator of the company.</p> | |
| 4.6.6 | <p>Storage of pesticides shall be according to recognised best practices. All pesticides containers shall be properly managed according to the existing regulations and or instructions enclosed on the containers (see criterion 5.3). - Major compliance -</p> | <p>Estate: All pesticides containers stored in Permitted Temporary Hazardous Waste "Tempat Penyimpanan Sementara Berijin". Its storage located surrounding the Estate Workshop complex. During field observation in its storage, all pesticide containers are well managed as license requirements.</p> <p>Smallholder: Tungkal Ulu Smallholder management has ensured that all agrochemical usage and chemical weeding including pest and disease management was performed by PT Inti Indosawit Subur. PT Inti Indosawit Subur has prepared the procedure for handling all pesticide containers, as per "Penanganan Limbah Bahan Berbahaya Beracun", No AA-KL-06-EFP revision 06, dated 1 August 2015. Safe Work Procedure on chemical storage, mixing and disposal that covered PPE, safe working procedure, handling of chemical, storage, chemical mixing and the disposal. Therefore, no pesticides storage in Smallholder Cooperative.</p> | Comply |
| 4.6.7 | <p>Application of pesticides shall be by proven methods that minimize risk and negative impacts. - Minor compliance -</p> | <p>Estate: During field observation to chemical storage and pesticide mixing area, sighted that building are locked, concrete and well manage properly. Pesticide mixing storage also completed with water containment, when pesticide residue collected inside the containment and re-use for spraying activities afterwards. Also, changing room for pesticide operators available in separate place and in well condition.</p> <p>Based on interview with 4 female and 1 male sprayers in Block E93a Div. 5, all workers is using PPE properly. All of these treatment is one method to minimize risk and negative impact for environmental and workers health.</p> | Comply |

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| | | <p>Smallholder: Based on field observation at Smallholder plot, no spraying activities conducted. However, auditor make an interview with Smallholder sample that spraying activities conducted by trained person of pesticide applicator of the company.</p> | |
| 4.6.8 | <p>Pesticides may only be applied aerially where there is a documented justification. Surrounding communities shall be informed of impending aerial pesticide applications with all relevant information within reasonable time prior to application.</p> <p>- Major compliance -</p> | <p>Estate: No aerially applied for any kind of pesticide within this estate.</p> <p>Scheme Smallholder: During interview and field check on sample of Smallholder plot, there is no pesticide aerially applied.</p> | N/A |
| 4.6.9 | <p>Evidence of training on handling pesticide for workers and scheme smallholder (if any) shall be available.</p> <p>- Minor compliance -</p> | <p>Estate: During interview with 4 female and 1 male sprayers in Block E93a Div. 5, activity is spraying of Glyphosate.</p> <p>All the sprayers' operator that interview onsite already trained and having certificate of pesticide used. This certificate issued from Pesticide and Fertilizer Monitoring Commission "Komisi Pengawasan Pupuk dan Pestisida", Jambi Province.</p> <ul style="list-style-type: none"> - Sapriadi (Foreman): Cert. No. 10/KP3/VIII/2015, dated 28 August 2015. - Susana: Cert. No. 09/KP3/V/2018, dated 9 May 2018. - Rina Asmara: Cert. No. 10/KP3/VIII/2015, dated 28 August 2015. - Sumiatmy: Cert. No. 21/KP3/XI/2014, dated 27 November 2014. - Opi Dahlisa: Cert. No. 09/KP3/V/2018, dated 9 May 2018. <p>Smallholder:</p> | Comply |

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| | | Based on field observation at Smallholder plot, no spraying activities conducted. However, auditor make an interview with Smallholder sample that spraying activities conducted by trained person of pesticide applicator of the company. | |
| 4.6.10 | <p>Proof that pesticide waste has been handled as per legal regulations and understood by worker and manager, shall be demonstrated.</p> <p>- Minor compliance -</p> | <p>Estate:</p> <p>During interview with 4 female and 1 male sprayers in Block E93a Div. 5, all the sprayers' operator that interview onsite already trained and understood on pesticide handling as per regulation.</p> <p>Field observation to "TPS Limbah B3":</p> <p>Evidence sighted "Berita Acara Pengambilan Limbah B3 PT. IIS – Kebun Tungkal Ulu", dated 14 January 2019. Transporter and collector: PT. Indostar Cargo. Transport license: SK KLHK No: S.306/VPLB3/PPLB3/PLB.3/4/2017, dated 6 April 2017.</p> <p>Hazardous waste transported:</p> <ol style="list-style-type: none"> 1. Used Lubricant: 800 L (4 drum). 2. Dirty Lubricant: 200 L (1 drum). 3. Medical waste: 40 kg (1 bucket). 4. Chemical containers: 540 kg (18 drum). 5. Used Battery: 17 pcs. <p>Smallholder:</p> <p>Based on field observation at Smallholder plot, no spraying activities conducted. However, auditor make an interview with Smallholder sample that spraying activities conducted by trained person of pesticide applicator of the company. All the pesticides container handled by the company.</p> | Comply |
| 4.6.11 | <p>Annual medical records of pesticide operators, and follow-up treatment of medical results, shall be available.</p> <p>- Major compliance -</p> | <p>Mill and Estate:</p> <p>PT Inti Indosawit Tungkal Ulu provides 6-monthly medical check-up for workers performing agrochemical spraying and chemical handling. The medical check-up covers blood test, urine test, cholinesterase test, and spirometry test. The latest medical check-up in Tungkal Ulu group conducted on December 2018 by Paramitha Laboratorium Pekanbaru. Record of MCU result were evident in "Rekapitulasi Global MCU Karyawan PT Inti Indosawit Subur Tungkal ulu Unit KTU Paket Pestisida Periode Desember 2018", total workers medical test 121 workers.</p> | Comply |

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| | | <p>Based on MCU result, there are several workers indicated abnormal:</p> <ul style="list-style-type: none"> - Hematology (Eosinofilia increasing) : 29 workers - Hematology (Leukositoria/Eritrosit increasing/Trombosit increasing/Hematokrit): 15 workers - Urinalysis (Glukose urine): 1 workers - Liver function: Cholinesterase decreasing (4.28): 1 workers <p>The result of MCU has communicated to workers on 17 April 2019 and the follow-up treatment are available as evident.</p> | |
| 4.6.12 | <p>Records shall be available to show that spraying is not conducted by pregnant or breast-feeding women.</p> <p>- Major compliance -</p> | <p>Estate: PT Inti Indosawit Subur – Tungkal Ulu Estate prohibits pregnant or breast-feeding women to perform chemical spraying. In order to mitigate, estate performed monthly pregnancy test.</p> <p>PT Inti Indosawit Subur – Tungkal Ulu has kept the record that spraying is not conducted by pregnant or breast-feeding women. The company has been conducting PP Test (pregnant test) every month. If any cases, the pregnant test result is positive then the workers to mutation in workplace that not handling the chemical.</p> <p>Record seen: "Berita Acara Tes Kehamilan PT IIS – Tungkal Ulu Periode April 2019", example: Pregnancy test dated 15 April 2019 for 7 sprayers under Foreman Mr. Sapriadi, 10 sprayers under Foreman Mr. Johan Este, 12 sprayers under Foreman Mr. Ridho Putra A., 4 fertilizing workers under foreman Dedi Iskandar, 8 fertilizing workers under foreman Jonsen S, 12 sprayers under Foreman Mr. Suhendrik, 7 Oryctes sprayer under Foreman Mr. Robi S., 15 sprayers under Foreman Mujiono, 8 sprayers under Foreman Nurkholis and 10 fertilizing workers under foreman Syahrizal. The pregnancy tests results all negative (-); no pregnant workers identified.</p> <p>Based on interview with sprayer workers (4 female workers) in Block E93A Division V Tungkal Ulu Estate can be demonstrated that there is no pregnant workers handling the chemical.</p> <p>Smallholder: Most of farmer members of Muara Bulian Smallholder were not directly conducted pesticide application and handling. Spraying works (pesticide application) in smallholder area were performed mostly by spraying team called TUS from PT Inti Indosawit Subur – Tungkal Ulu Estate. Muara Bulian</p> | Comply |

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| | | <p>Smallholder management ensured that all agrochemical usage and waste handling was performed by PT Inti Indosawit Subur. Medical check-up records are kept by PT Inti Indosawit Subur.</p> | |
| <p>Criterion 4.7 An occupational health and safety plan is documented, effectively communicated and implemented.</p> | | | |
| <p>4.7.1</p> | <p>A health and safety policy shall be in place. A health and safety plan shall be documented and implemented, and its effectiveness monitored. - Major compliance -</p> | <p>Mill and Estate: There were no changed related to OHS Policy from previous assessment. PT Inti Indosawit Subur – Tungkal Ulu POM and supply bases has been established a health and safety policy under “Kebijakan Perusahaan”, updated 1st December 2014, was signed by Managing Director. In point 3, Committed to implement and maintain occupational health and safety management system in compliance with national and international applicable regulation. Point 5. Integrating social, environmental, food security, occupational health and safety issues into operational activities, adopting best technology available, and maintain trained manpower, with skills, and motivated to improve performance through continuous improvement program. The policy was also displayed at in public board in Tungkal Ulu POM, in each Division Office and Tungkal Ulu Office. The policy has communicated to all employees, e.g: Attendance list on socialization of OHS policy dated 16th March 2019, location in Tungkal Ulu POM was attended by 31 workers. The organization has also prepared the procedure related to OHS, e.g: – “Standard Operating Procedure Alat Pelindung Diri” on personal protective equipment No.AA-SOP-OP-101.3-R0 dated 14/08/2013 – “Prosedur Pengendalian Kebakaran di Pabrik, Kantor dan Perumahan” for fire mitigation No.AA-KL-15-EP dated 01/12/2010 – “Standard Operational Procedure – Identifikasi Bahaya, Penilaian Risiko dan Penentuan Pengendalian” No AA-SMK3-02-RO, dated 3rd August 2017. – “Standard Operational Procedure – Keselamatan di Perbengkelan”, No AA-KL-09-EFP, revision 01, dated 1st Dewcember 2010. – PT Inti Indosawit Subur has revised the accident investigation form under procedure no: SOP AA-OP-SMK3-07-FM Accident Investigation SOP, August 3, 2017. In the accident investigation form include: the accident data, details of injuries/sections exposure, photographs/sketches,</p> | <p>Comply</p> |

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| | | <p>evidence of investigation (witnesses, positions, equipment, documents), sequence of events (pre-contact, contact, post-contact), type of incident, cause of accident (unsafe, unsafe) accidents (personal and work factors), corrective and preventive actions, investigative team. During audit verification, found that the accident form was complete and adequate.</p> <p>The document of OHS Program available under "OBJECTIVE AND Program – 2019 PT Inti Indosawit Subur Tungkal Ulu POM & Estate" such as:</p> <ul style="list-style-type: none"> - Established the document of hazard identification, risk assesment and its control -> - Meeting on safety committee (P2K3) -> monthly - Report of OHS committee (P2K3) -> 3 months bases - Training of emergency response and preparedeness -> annually - Safety briefing -> daily - Providing the PPE for all employees - Inspection on PPE usage -> daily - Medical checkup for workers chemical handling -> each semester - General medical checkup for workers -> annualy - Training for operator in POM and workshop <p>The record of implementation the OHS Program available in indicator 4.7.2-4.7.7 below.</p> <p>Smallholder: Cooperatives has established the policy related to OHS under "Kebijakan Koperasi", dated 2nd Desember 2016, was signed by Head of KUD, in point 3 mentioned "Menerapkan dan memelihara system manajemen lingkungan, social, keselamatan pangan, kesehatan dan keselamatan kerja terpadu.</p> <p>The policy has communicated to Smallholder member and displayed in publication board in each KUDs office.</p> <p>OHS Program available under "Program Manajemen K3 PT Inti Indosawit Subur Kebun Plasma Tungkal Ulu", e.g: in KUD Bina Usaha, KUD Harapan jaya, Koperasi Manunggal Jaya, KUD Argo Makmur has prepared the OHS plan such as: Training of PPGD/First aid, Basic safety, Basic fire, accident investigation, emergency response drill. OHS awareness and PPE providing and monitoring.</p> | |
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| <p>4.7.2</p> | <p>A documented risk assessment shall be available and its implementation shall be recorded.</p> <p>- Major compliance -</p> | <p>Mill and Estate: PT Inti Indosawit Subur – Tungkal Ulu has a procedure to identify and prepare a risk assessment register (HIRAC). The procedure of HIRADC (Hazard identification and risk analysis and determining control) as a guidance and standard to conducted the hazard and risk assessment as well as the determining control for risk and hazard. Procedure presented in SOP "Identifikasi bahaya, Penilaian Resiko dan Penentuan Pengendalian" AA-SMK3-02-R0 dated 3 August 2017.</p> <p>Risk assessment method used is quantitative and qualitative method which is the multiplication of severity with the level of possibility. The company has set matrix multiplication result, which is subsequently determined from the matrix level / quality risk is divided into five (5) categories: extreme, high, moderate, low and tolerance/permitted.</p> <p>PT Inti Indosawti Subur has prepared the document of risk assessment both of Tungkal Ulu POM and Estate. The risk assessment available under "Analisa Resiko tahun 2018", last review on 5th February 2019 and March 2019. Risk assessment has identified hazard and risk from office activities, mill opeartion, infrastructure construction activities, warehouse and workshop related activities, harvesting and FFB loading activities, fertilizer and spraying activities.</p> <p>Most of activities/processes that have risk level of moderate and low, the operational control has performed and monitoring as well as to provide an appropriate personal protective equipment.</p> <p>Smallholder: Cooperative has shown the document of "Hazard Identification and Risk Assessment and Control (HIRAC) – Analisis Risiko tahun 2017-2018", last review on 9th April 2019, the risk assessment has reviewed by OHSI expert (Mr Muhammad Junaidi and Mr Janer Wiliam G). The document has covered for all activities in field, e.g: transport FFB, harvester, manuring, spraying.</p> <p>During audit document HIRADC document for KUD Harapan Jaya, KUD Bina Usaha, Koperasi Manunggal Jaya and KUD Argo Makmur were available and could be demonstrated.</p> | <p>Comply</p> |
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| | | <p>The implementation of risk analysis and risk control can be demonstrated during field audit such as: PPE provision for harvester (helmet, safety boot, glasses and handgloves, egrek cover), OHS awareness for harvester and smallholder member.</p> | |
| <p>4.7.3</p> | <p>Records of Occupational Health and Safety (OHS) program (see 4.8) and Personal Protective Equipment (PPE) training in accordance with the result of hazard identification and risk analysis shall be available to all workers.</p> <p>- Major compliance -</p> | <p>Mill and Estate: The company has prepared the Standard Operating Procedure on personal protective equipment No.AA-SOP-OP-101.3-R0 dated 14/08/2013.</p> <p>The record of implementation of OHS program year 2018/2019 were available, such as:</p> <ul style="list-style-type: none"> - First aid training has been conducted on 24 July 2018 for Tungkal Ulu POM, Tungkal Ulu Estate and Plasma Tungkal Ulu Training on first aid/emergency response, - High Conservation value training on 8 February 2018 - Basic fire training on 7 February 2018 - RSPO refresh training on 3 August 2018, - Training for "Pesawat Uap Operator" on 8 August 2018. - Checklist on inspection of PPE using (daily) "Daftar Periksa Alat Pelindung Diri", e.g: in Division I for harvester in January, February and March 2019 – evident. - Record of handover of PPE and uniform for employee both Estate and POM. - Report of annual medical checkup for all employee, conducted on December 2018 by Paramitha Laboratorium Pekanbaru. Record of MCU result were evident in "Rekapitulasi Global MCU Karyawan PT Inti Indosawit Subur Tungkal ulu Unit KTU Paket Pestisida Periode Desember 2018", total workers medical test 121 workers - Emergency drill has been conducted on May 2018 regarding Fire at Palm Oil Mill and on February 2018 regarding fire at palm oil plantation. Evident verified: scenario, evaluation, recommendation, list of attendance - Fire danger rating and fire monitoring in Tungkal ulu Estate area performed by Security team patrol each day particularly in dry season. Record of fire danger rating monitoring and fire patrol were available in "Sistem Peringkat Bahaya Kebakaran harian (SPBK) Harian" record seen for period May 2019, the fire danger rating is green with low risk. Fire patrol recorded in "Laporan Patroli", record seen for period April 2019, there is no hotspot and fire found in the Tungkal Ulu Estate area. | <p>Comply</p> |

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| | | <ul style="list-style-type: none"> - Safety committee meeting, dated 18th March 2019 in Tungkal Ulu Estate, agenda: risk analysis review, OHS performance review, fire monitoring, fire danger rating monitoring, accident investigation, PPE provision for worlcers. Minutes of meeting are available. <p>Smallholder: Cooperative has kept the record of PPE provision for workers (harvester) and smallholder member, for example:</p> <ul style="list-style-type: none"> - Provision of safety boot for harvester & smallholder member on 7th February 2019 in KUD Bina Usaha receipt by 25 workers/member; - Provision of safety boot on March 2019 in KUD Argo Makmur receipt by 33 member/workers; ; - Provision of safety boot on April 2019 in KUD Harapan Jaya receipt by 34 member/workers; - Provision of safety helmet on 21 February 2019 in KUD Manunggal Jaya receipt by 25 member/workers; <p>PPE usage were monitored by Foreman in the field to ensure that the workers are using the appropriate PPE for harvesting such as safety boot, safety helmet and egrek cover. Evidence of PPE usage by workers/harvester recorded in "Checklist Pemakaian APD". Sample verified during audit for checklist period April 2019 at KUD Harapan Jaya, KUD Bina Usaha, Koperasi Manunggal Jaya and KUD Argo Makmur were available and could be demonstrated.</p> <p>Training OHS and PPE has been conducted by plasma management to KUD/cooperatives, sample verified:</p> <ul style="list-style-type: none"> - KUD Bina Usaha: OHS training conducted on 21 January 2019, attended by 14 participant. PPE training on 4 March 2019 attended by 20 participants. - Koperasi Manunggal Jaya: OHS training conducted on 26 February 2019, attended by 22 participants. PPE training on 27 February 2019 attended by 28 participants. - KUD Argo Makmur: OHS training conducted on 20 February January 2019, attended by 30 participant. PPE training on 26 March 2019 attended by 30 participants. - KUD Harapan Jaya: OHS training and PPE training conducted on 1 April 2019 attended by 22 participants. | |
| 4.7.4 | The responsible person(s) for occupational health and safety shall be identified and there shall be records of | <p>Mill and Estate: PT Inti Indosawit Subur Tungkal Ulu POM has assigned a responsible person for OHS, namely Mr Salman Alfarisi who has attended the training of OHS expert by Ministry of Manpower Republic</p> | Comply |

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| <p>periodical meetings on health and safety issues.</p> <p>- Major compliance -</p> | <p>Indonesia, assigned as OHS expert according to "Keputusan Menteri Tenaga Kerja R.I Nomor: Kep.2965/NAKER-BINWASK3/IV/2017" dated 18 April 2017, valid for 3 years; number of OHS expert license No.Reg.3897/PK3/AJ/14/2017/PO valid until 18 April 2020. While in Tungkal Ulu Estate assigned responsible person for OHS namely Mr Rudi Wijaya who has attended the training of OHS expert by Ministry of Manpower Republic Indonesia, assigned as OHS expert according to "Keputusan Menteri Tenaga Kerja R.I Nomor: Kep.17332/M/DJPPK&K3/XII/2015" dated 9 December 2015, valid until 9 December 2018; number of OHS expert license No.Reg.3897/PK3/AJ/14/2017/PO valid until 9 December 2019. Currently company has apply and process the renewal license for OHS expert assignment according to "Surat Keterangan Pengawas Ketenagakerjaan" dated 21 May 2019.</p> <p>PT Inti Indosawit Subur – Tungkal Ulu Estate has restructurized the OHS committee since 2019, OHS committee has been registered under P2K3 (Panitia Pembina Keselamatan dan Kesehatan Kerja) as per "Keputusan Kepala Dinas Tenaga Kerja Kabupaten Tanjung Barat Nomor 560/845/3.3/P2K3/NAKER/2019 tentang Pengesahan Perubahan Panitia Pembina Keselamatan dan Kesehatan Kerja (P2K3) PT Inti Indosawit Subur Kebun Tungkal Ulu", dated 16th May 2019. OHS committee headed by Senior Manager Muhamad Luth and secretary of P2K3 is Rudi Wijaya as OHS expert with member of P2K3 39 personel.</p> <p>PT Inti Indosawit Subur – Tungkal Ulu POM has also restructurized the OHS committee since 2019, OHS committee has been registered under P2K3 (Panitia Pembina Keselamatan dan Kesehatan Kerja) as per "Keputusan Kepala Dinas Tenaga Kerja Kabupaten Tanjung Barat Nomor 560/846/3.3/P2K3/NAKER/2019 tentang Pengesahan Perubahan Panitia Pembina Keselamatan dan Kesehatan Kerja (P2K3) PT Inti Indosawit Subur Kebun Tungkal Ulu", dated 16th May 2019. OHS committee headed by Mill Manager Tatar Simanjuntak and secretary of P2K3 is Salman Alfarisi as OHS expert with member of P2K3 20 personel.</p> <p>P2K3 has conducted the periodical meeting, record seen: Tungkal Ulu POM:</p> <ul style="list-style-type: none"> - Minutes of Meeting, dated 25th January 2019, agenda: OHS refreshment, review and analysis accident record/report, review disease report of clinic. - Minutes of Meeting, dated 25th February 2019, agenda: Progress shower repairing in hazardous waste storage, warning sign repairing, biogas plant enrichment by planting the trees. | |
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| | | <ul style="list-style-type: none"> - Minutes of Meeting, dated 25th February 2019, agenda: replacement the hazardous waste sign board, boundary marking the domestic waste pond, house keeping hazardous waste storage. <p>Tungkal Ulu Estate:</p> <ul style="list-style-type: none"> - Minutes of Meeting, dated 14th January 2019, agenda: OHS performance review, Risk analysis review, OHS inspection, fire emergency response check, accident investigation, PPE provision for workers. - Minutes of Meeting, dated 15th February 2019, agenda: OHS performance review, Risk analysis review, OHS inspection, fire emergency response check, accident investigation. - Minutes of Meeting, dated 18th March 2019, agenda: risk analysis review, OHS performance review, fire monitoring, fire danger rating monitoring, accident investigation, PPE provision for worlkers. <p>Report of P2K3 meeting and OHS performance has reported to Manpower Agency in Tanjung Jabung Barat Regency each quarter (three-monthly), sample seen report P2K3 January – March 2019 2018, was reported to Manpower Agency in Tanjung Jabung Regency on 16th May 2019. Evidence of report receipt can be demonstrated during audit.</p> <p>Smallholder: Scheme smallholder has appointed Mr Muh. Junaidi as person in charge for cooperative’s health and safety aspects under letter No. 001/INT/KLT/I/2018 tentang Penunjukan Penunjukan Petugas Monitoring Kegiatan K3, dated 8th January 2018.</p> | |
| 4.7.5 | <p>A procedure for emergency and work accident shall be available in Indonesian Language; and the workers, who have attended First Aids training, are available in the working areas.</p> <p>- Minor compliance -</p> | <p>Mill and Estate: Emergency Response procedure has been established No. File: AA-EMS-447-PR Rev.2 Dated March 2017. Emergency situation in Buatan Estate and Smallholder: for Fire, Chemical, Agro Chemical Spill and Hazardous spill to environment. Emergency Organization structure has been available also for job and responsibility has been defined for each section. Emergency condition in Tungkal Ulu POM: for fire, IPAL leakage, Hazardous waste spillage, Boiler and gas tube Explosion, earth quake, floods, landslide.</p> | Comply |

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| | | <p>Emergency response scenario has been established by Tungkal Ulu POM particularly for fire emergency response. A team for emergency response has been established and updated on 2 January 2019, headed by Mill Manager and Estate Manager Records of accidents maintained properly by safety officers and reported regularly to local authorities.</p> <p>Emergency drill has been conducted on May 2018 regarding Fire at Palm Oil Mill and on February 2018 regarding fire at palm oil plantation. Fire danger rating and fire monitoring in Tungkal ulu Estate area performed by Security team patrol each day particularly in dry season. Record of fire danger rating monitoring and fire patrol were available in "Sistem Peringkat Bahaya Kebakaran harian (SPBK) Harian" record seen for period May 2019, the fire danger rating is green with low risk. Fire patrol recorded in "Laporan Patroli", record seen for period April 2019, there is no hotspot and fire found in the Tungkal Ulu Estate area.</p> <p>Mechanism on handling an accident investigation under procedure no: SOP AA-OP-SMK3-07-FM Accident Investigation SOP, August 3, 2017. In the accident investigation form include: the accident data, details of injuries/sections exposure, photographs/sketches, evidence of investigation (witnesses, positions, equipment, documents), sequence of events (pre-contact, contact, postcontact), type of incident, cause of accident (unsafe, unsafe) accidents (personal and work factors), corrective and preventive actions, investigative team. During audit verification, found that the accident form was complete and adequate.</p> <p>First aid training has been conducted on 24 July 2018 for Tungkal Ulu POM, Tungkal Ulu Estate and Plasma Tungkal Ulu. Evidence with attendance list and training documentation.</p> <p>PT Inti Indosawit Subur – Tungkal Ulu has appointed a worker who have attended the First Aid training. Data verified: License for First Aider no register L.P001/560/4.3/DTKT/2018, namely Mrs Evianty Sembiring, A.Md.Keb, valid until 2nd January 2020; First Aider licence on behalf Elvita Rossi register number L.P.008/560/5.3/DSTK/2017, June 2017 valid until June 2019. List of first aid kit (include portable first aid) as in "Checklist inspeksi P3K" location in Estate office, chemical warehouse, field foreman (24 pcs of portable fist aid) while in Tungkal Ulu POM there were 9 first aid kit located in Fuel storage/Ware house, Workshop, Office, Warehouse central, Grading station, Laboratoy, weighbridge office and parking area.</p> | |
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| | | <p>Smallholder: The cooperative has prepared the procedure for emergency under document "Rencana Tindakan Tanggap Darurat" dated 2nd January 2018, consist of fire, earthquake, flood and landslide.</p> <p>The procedure for work incident has demonstrated as in document "Mekanisme Pertolongan Pertama Pada Kecelakaan", document verified in KUD Bina Usaha has reviewed the procedure on 21 January 2019, KUD Manunggal Jaya reviewed the procedure on 12 February 2019, Koperasi Harapan Jaya reviewed the procedure on 22 January 2019, KUD Argo Makmur reviewed the procedure on 21 January 2019</p> <p>KUD/Cooperative also has established the emergency call center and important call for emergency situation. The emergency call center are available in "No. Telp Yang Bisa Dihubungi" consist of: Dinas Kebakaran Provinsi Jambi, Damkar Dishut Tanjabar, Humas PT Inti Indosawit Subur, Kepala Damkar PT IIS, Village head, Head of KUD/cooperatives.</p> <p>KUD Cooperative has prepare the fire emergency response equipment, sample seen for KUD Harapan Jaya, KUD Bina Usaha, Koperasi Manunggal Jaya and KUD Argo Makmur. Each KUD has provide the equipment of emergency response i.e: Kentongan 1 pcs, Ember 5 pcs, Cangkul 2 pcs, Kapak/parang 2 pcs, Galah pengait 2 pcs, Knapsack 2 unit, water pump 1 unit.</p> <p>First aid training has been conducted by management plasma Tungkal Ulu to KUD/cooperatives, sample seen:</p> <ul style="list-style-type: none"> - KUD Bina Usaha: First aid training conducted on 14 March 2019, attended by 16 participant. - Koperasi Manunggal Jaya: First aid training conducted on 8 May 2018, attended by 12 participants. - KUD Argo Makmur: First aid training conducted on 16 March 2019, attended by 32 participants. - KUD Harapan Jaya: First aid training conducted on 17 January 2019, attended by 21 participants. | |
| 4.7.6 | <p>All workers shall be provided with medical care, and covered by accident insurance (see criterion 6.5.3).</p> <p>- Minor compliance –</p> | <p>PT Inti Indosawit Subur – Tungkal Ulu has provide insurance to all workers including non-permanent worker. Insurance covered by BPJS, as mandated by government regulation. Medical checkup provided for all workers (not only for high-risk worker).</p> <p>PT Inti Indosawit Subur – Tungkal Ulu has also been provided clinic (Klinik Asian Agri Sehat) for all workers freely. Referral are made to nearest hospital should the case is severe/critical.</p> | Comply |

| | | <p>Medical check-up has been conducted for all workers all in Tungal Ulu. The medical check-up including blood test, physical examination, audiometric test and spirometric test. Result of examination for worker is kept. Company also providing social and accident insurance in from BPJS Ketenagakerjaan – for all workers.</p> <p>Record payment of BPJS Ketenagakerjaan/Kesehatan in “Bukti Transfer Bank”.</p> <p>Document verification: Tungal ulu POM</p> <ul style="list-style-type: none"> - Payment Code 190502552864, Payment period April 2019, workers paid 37 workers SKU-H. Formulir Jamsostek 2 “Rekapitulasi Rincian Pembayaran Iuran April 2019” Registration Number PTU EE.00.1726 - Payment Code 190502924446, Payment period April 2019, workers paid 84 workers SKU-B. Formulir Jamsostek 2 “Rekapitulasi Rincian Pembayaran Iuran April 2019” Registration Number PTU-JP 17019920. <p>Tungal Ulu Estate:</p> <ul style="list-style-type: none"> - Payment period April 2019, workers paid 660 workers SKU-H. Formulir Jamsostek 2 “Rekapitulasi Rincian Pembayaran Iuran April 2019” Registration Number KTU EE.000949. Payment by Bank transfer Number 23999**. - Payment period April 2019, workers paid 342 workers SKU-B. Formulir Jamsostek 2 “Rekapitulasi Rincian Pembayaran Iuran April 2019” Registration Number KTU-JP 17019920. Payment by Bank transfer Number **396134. <p>Smallholder: No workers being employ permanently by the Smallholder. Provision of insurance in case of accident, through donation from Smallholder and “Kelompok Tani”.</p> | | | | | | | |
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| 4.7.7 | <p>Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics.</p> <p>- Minor compliance</p> | <p>Mill and Estate: PT Inti Indosawit Subur – Tungal Ulu POM and Estate Estate has shown the record of “Indeks K3 Pabrik/Kebun Tungal Ulu period January – December 2018. Reported in Tungal Ulu POM & Estate:</p> <table border="1" data-bbox="757 1334 1827 1399"> <thead> <tr> <th data-bbox="757 1334 1115 1366">Category</th> <th colspan="2" data-bbox="1115 1334 1827 1366">Case Number</th> </tr> </thead> <tbody> <tr> <td data-bbox="757 1366 1115 1399"></td> <td data-bbox="1115 1366 1473 1399">Tungal Ulu POM</td> <td data-bbox="1473 1366 1827 1399">Tungal Ulu Estate</td> </tr> </tbody> </table> | Category | Case Number | | | Tungal Ulu POM | Tungal Ulu Estate | Comply |
| Category | Case Number | | | | | | | | |
| | Tungal Ulu POM | Tungal Ulu Estate | | | | | | | |

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|--|-----|--|----------|-----|-----|-------------------|-----|-----|------|-----|-----|-----------------|-----|-----|-------------|---|----|-----------|----|-----|------------------|-----|-----|--|--|--|
| | | <table border="1"> <tr> <td>Fatality</td> <td>Nil</td> <td>Nil</td> </tr> <tr> <td>Permanent disable</td> <td>Nil</td> <td>Nil</td> </tr> <tr> <td>Fire</td> <td>Nil</td> <td>Nil</td> </tr> <tr> <td>Property damage</td> <td>Nil</td> <td>Nil</td> </tr> <tr> <td>Medical aid</td> <td>9</td> <td>71</td> </tr> <tr> <td>First aid</td> <td>26</td> <td>Nil</td> </tr> <tr> <td>Near miss report</td> <td>Nil</td> <td>Nil</td> </tr> </table> | Fatality | Nil | Nil | Permanent disable | Nil | Nil | Fire | Nil | Nil | Property damage | Nil | Nil | Medical aid | 9 | 71 | First aid | 26 | Nil | Near miss report | Nil | Nil | | | |
| Fatality | Nil | Nil | | | | | | | | | | | | | | | | | | | | | | | | |
| Permanent disable | Nil | Nil | | | | | | | | | | | | | | | | | | | | | | | | |
| Fire | Nil | Nil | | | | | | | | | | | | | | | | | | | | | | | | |
| Property damage | Nil | Nil | | | | | | | | | | | | | | | | | | | | | | | | |
| Medical aid | 9 | 71 | | | | | | | | | | | | | | | | | | | | | | | | |
| First aid | 26 | Nil | | | | | | | | | | | | | | | | | | | | | | | | |
| Near miss report | Nil | Nil | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>Based on Lost Time Accident (LTA) metrics, Since January – December 2018 in Tungkal Ulu Estate reported 71 incident (medical aid) with lost time injury 1.7 days, Frequency rate (FR) 0, Saverity Rate 0, injury rate 6.53.</p> | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>While in Tungkal Ulu POM reported 22 incident (First aid & medical aid) with lost time injury 9 days, Frequency rate (FR) 9.78, Saverity Rate 308.2, injury rate 171.21.</p> | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>Smallholder: The procedure for work incident has demonstrated as in document “Mekanisme Pertolongan Pertama Pada Kecelakaan”, document verified in KUD Bina Usaha has reviewed the procedure on 21 January 2019, KUD Manunggal Jaya reviewed the procedure on 12 February 2019, Koperasi Harapan Jaya reviewed the procedure on 22 January 2019, KUD Argo Makmur reviewed the procedure on 21 January 2019.</p> | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>KUD/cooperatives record the work incident in “Rekaman kejadian Kecelakaan Kerja Tahun 2018 – 2019”. Record of incident were also available in Puskesmas (Village clinic). Sample verified:</p> <ul style="list-style-type: none"> - In KUD Bina Usaha, during July 2018 – April 2019 recorded 9 case of light incident and categorized as first aid and medical aid. There is no lost time injury caused by the incident. - In Koperasi Manunggal Jaya, during July 2018 – April 2019 recorded 2 case of light incident and categorized as first aid and medical aid. There is no lost time injury caused by the incident. - In KUD Argo Makmur, during July 2018 – April 2019 recorded 2 case of light incident and categorized as first aid and medical aid. There is no lost time injury caused by the incident. - In KUD Harapan Jaya, during July 2018 – April 2019 recorded 7 case of light incident and categorized as first aid and medical aid. There is no lost time injury caused by the incident. | | | | | | | | | | | | | | | | | | | | | | | | | | |

| Criterion 4.8 | | |
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| All staff,workers, Smallholder and contract workers are appropriately trained. | | |
| 4.8.1 | <p>Records of training program related to the aspects of RSPO Principles and Criteria shall be available.</p> <p>- Major compliance -</p> | <p>Mill and Estate:</p> <p>PT Inti Indosawit Subur has its own training institution assigned to arrange its training programms. Asian Agri Learning assessing all the training need for each personnel – based on job description. The training plan prepared annually.</p> <p>Competence evaluation carried out by line managers, to evaluate competence level of each worker for relevant position. Competence gap identified is considered to be trained for worker. The matrix training is updated by HRD Medan and AAA Learning Instute annually. Based on minimum training requirement, AAA Learning institute, detailing training program in type of training, participants, PIC, number of participants, training schedule.</p> <p>PT Inti Indosawit Subur – Tungkal Ulu has prepared a competence matrix for each worker based on job description .e.g: “Kompetensi Mekanik – Bengkel Traksi Tungkal Ulu Estate” identified the competence/skill related to hydraulic, electrical, welding, tire repair and civil work., “Klinik Kerja Mandor – Tungkal Ulu Estate untuk” Harvesting overseer, indicator reviewed including harvesting rotation, production output, FFB quality and crop projection accuracy.</p> <p>PT Inti Indosawit Subur – Tungkal Ulu POM has shown the record of training program related to the aspect of RSPO PnC under document “Program Pelatihan Environmental dan Sustainability Tahun 2019”, such as:</p> <ul style="list-style-type: none"> - Training on High Conservation Value -> planned in November 2019, - Basic Fire Training -> planned in May 2019, - Sustainability Awareness Training (principles and criteria) -> planned in November 2018 - Basic Safety (K3 Refresh) Training -> planned in October 2019 - First Aider (PPGD) Training -> planned in August 2019 - Training on management of hazardous waste (refresh) -> planned in February 2019 - Training Operator WTP (refresh) -> planned in September 2019 - Training RSPO/ISCC (refresh) -> planned in July 2019 - Training Genset Operator (refresh) -> planned in March 2019, implementation on 22 April 2019’ - Training on Emergency response -> planned in September 2019 |
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| | <ul style="list-style-type: none"> - Training Supply Chain -> planned in December 2019 - Training Biogas Plant/Gas Engine Operator -> planned in April 2019, implementation on 22 April 2019. <p>Smallholder: Group Manager (Kantor Plasma) has prepared the document of training program under "Rencana Pelatihan Bulanan tahun 2019 Kebun Plasma Tungkal Ulu", such as:</p> <ul style="list-style-type: none"> - Awareness training of RSPO PnC -> planned in January 2019 - Basic safety training -> planned in February 2019 - Training of HCV -> planned in February 2019 - Training of first aider -> planned in August 2019 - Training on basic fire -> planned in February 2019 <p>Record of training implementation, e.g: KUD Bina Usaha:</p> <ul style="list-style-type: none"> - First aid training conducted on 14 March 2019, attended by 16 participant. - OHS training conducted on 21 January 2019, attended by 14 participant. PPE training on 4 March 2019 attended by 20 participants - Refreshment training on integrated pest management on 26 March 2019 attended by 18 participants (head of KT). - HCV refreshment training and socialization conducted on 16 April 2019, attended by 19 participants. <p>Koperasi Manunggal Jaya:</p> <ul style="list-style-type: none"> - First aid training conducted on 8 May 2018, attended by 12 participants. - OHS training conducted on 26 February 2019, attended by 22 participants. PPE training on 27 February 2019 attended by 28 participants - Refreshment training on integrated pest management on 2 April 2019 attended by 7 participants (head of KT). - HCV refreshment training and socialization conducted on 27 February 2019, attended by 28 participants. <p>KUD Argo Makmur:</p> | |
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| | | <ul style="list-style-type: none"> - First aid training conducted on 16 March 2019, attended by 32 participants. - OHS training conducted on 20 February January 2019, attended by 30 participant. PPE training on 26 March 2019 attended by 30 participants. - Refreshment training on integrated pest management on 5 March 2019 attended by 23 participants (head of KT and member). - HCV refreshment training and socialization conducted on 5 Maret 2019, attended by 23 participants. <p>KUD Harapan Jaya:</p> <ul style="list-style-type: none"> - First aid training conducted on 17 January 2019, attended by 21 participants. - OHS training and PPE training conducted on 1 April 2019 attended by 22 participants. - Refreshment training on integrated pest management on 17 January 2019 attended by 21 participants (head of KT and member). - HCV refreshment training and socialization conducted on 21 Maret 2019, attended by 25 participants. | |
| 4.8.2 | <p>Records of training for each employee shall be maintained.</p> <ul style="list-style-type: none"> - Minor compliance – | <p>Mill and Estate: Realisation of training programme Tungkal Ulu POM 2018 can be demonstrated such as: High Conservation value training on 8 February 2018, Basic fire training on 7 February 2018, First Aider training on 24 July 2018, RSPO refresh training on 3 August 2018, Supply chain training on 9 April 2018, Technical and managerial training on 8 August 2018, training for "Pesawat Uap Operator" on 8 August 2018. Record of training implementation are available and can be demonstrated. Record of each employee training can be demonstrated during audit in "Personal Data Traiing" updated on May 2019.</p> <p>Smallholder: Record training for smallholder's member and their workers is documented in "Training Record" in Notulen Training as evident and describe in indicator 4.8.1</p> | Comply |

Principle 5: Environmental responsibility and conservation of natural resources and biodiversity

Criterion 5.1
Aspects of plantation and mill management, including replanting, that have environmental impacts are identified, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.

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| <p>5.1.1</p> | <p>Environmental impact assessment document(s) shall be available.</p> <p>- Major compliance -</p> | <p>Mill and Estate:</p> <p>PT. Inti Indosawit Subur - Tungkal Ulu POM has demonstrated the document of Analisis Mengenai Dampak Lingkungan (AMDAL) consist of document ANDAL, RKL and RPL as approved through "Persetujuan Komisi Amdal Departemen Pertanian No.014/Andal/RKL-RPL/BA/V/1995 tentang Persetujuan ANDAL dan RKL-RPL perkebunan Kelapa Sawit dan Pabrik Minyak Kelapa Sawit PT Inti Indosawit Subur" dated 3 May 1995.</p> <p>The document covers scope of areal of 32,000 ha consist of Kuala Tungkal Estate 20,000 ha and Muara Bulian Estate 12,000 ha and palm oil mill capacity 90 Tonnes FFB/hour for Kuala Tungkal and 30 Tonnes FFB/hour for Muara Bulian. Revision on AMDAL document is available for PT Inti Indosawit Subur through "Surat Keputusan Bupati Tanjung Jabung Barat No.309, year 2009, dated 6th June 2009, for 4,614.02 ha, consist of 3,503.02 ha, as per "Surat Keputusan Gubernur Kepala Daerah Tingkat I Propinsi Jambi No.342/1987" dated 19 June 1987. And second land title of 1,111 ha as per "Surat Keputusan Bupati Tanjung Jabung Barat No.746, tahun 2006, tentang Izin Lokasi untuk Keperluan Pembangunan Perkebunan Kelapa Sawit Atas Nama PT. IIS, AMDAL also cover 10,277 ha for Plasma and Palm Oil Mill with capacity 60 ton TBS/jam", dated 20 October 2006.</p> <p>AMDAL document produced by Pusat penelitian Lingkungan Hidup (PPLH) Lembaga Penelitian – Universitas Jambi. PT Inti Indosawit Subur has also prepared Evaluation of Environmental Impact-Aspects (Environmental management system – EMS-431-003-LT) each year, latest assessment conducted on 11 June 2018 for activities of Mill and estate including replanting activities which currently being undertaken by the company. Those utilized as tool to evaluate the implementation of environmental management and monitoring tools.</p> <p>In Tungkal Ulu Palm Oil Mill, also has Biogas Plant and Kernel Crushing Plant and has an environmental permit according to "Keputusan Kepala Badan Lingkungan Hidup Daerah Kabupaten Tanjung Barat Nomor: 660.5/27/IX/BLHD/2016 tentang Izin Lingkungan atas kegiatan pembangunan dan pengoperasian Biogas Plant dari limbah cair PMKS Kapasitas 3 MW dan Kernel Crushing Plant (KCP) Kapasitas 200 ton/hari di Desa Merlung Kecamatan Merlung Kab. Tanjung Jabung Barat Provinsi Jambi" dated 2 September 2016. Biogas Plant and KCP has develop "Upaya Pengelolaan Lingkungan (UKL) dan Upaya Pemantauan Lingkungan (UPL)".</p> | <p>Comply</p> |
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| | | <p>Smallholder: Environmental Impact Assessment and HCV of the Plasma Tungkal Ulu has identified the significant potential environmental impacts deriving from operational activities such as: fertilizing, weeds control, pest and disease control, harvesting, FFB transportation, road and bridge maintenance, ditch maintenance, chemical storage, hazardous waste storage, office. Group Manager has provided the document of Evaluation of impact on the environment as per "Evaluasi Aspek Dampak Lingkungan Kebun Plasma Tungkal Ulu" updated on 1 January 2019.</p> <p>During audit, sampled seen in KUD Bina Usaha, KUD Manunggal Jaya, KUD Argo Makmur and KUD Harapan Jaya. Smallholder cooperative can be demonstrated the environmental aspect and impact and its control. All the members have attended the training for Environmental Risk, which cover all the environmental impacts identified in the operations in their oil palm plantations. Interview with smallholder member can be demonstrated that they have understanding on environmental aspect and impact in their operation such as: water pollution, soil pollution and biodiversity decreasing as well as social impact.</p> | |
| 5.1.2 | <p>Environment management plan document to prevent negative impacts, its implementation report and revision (if the identification of impact requires changes in current company's practices) shall be available. The company's management shall appoint the responsible person(s) for the implementation of the document.</p> <p>- Minor compliance -</p> | <p>Estate: Environmental Management and Monitoring Plan are available within "Matriks Pengelolaan dan Pemantauan Lingkungan" document.</p> <p>As per document, environment management plan to prevent negative impact such as:</p> <ul style="list-style-type: none"> - To prevent air quality decrease from POM operational and FFB transportation, company performed action: Reduce exhaust emissions from the engines by maintenance routine engine, dust bin installation in boiler stack and design the height of boiler stack as per regulation, planting the crops to reduce the pollutant/absorp the pollutant near POM, limiting the vehicle speed around POM; - To prevent noise from machine and POM operation, company performed isolating the noise source and machine maintenance, planting the crops as a green belt in surrounding POM, regular noise measurement; - To prevent water quality decrease, using palm Oil Mill Effluent (POME) as organic fertilizer (land application), maintaining waste water treatment plant (IPAL), maintain and monitoring land application; | Comply |

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| | | <ul style="list-style-type: none"> - To prevent decreasing of biodiversity, company performed enhancing biodiversity in riparian by planting local species, placing signboard to prohibit illegal hunting in conservation area and around estate, awareness to employee and surrounding community to save the protected species. - To prevent social conflict, community perception and enhance the surrounding economic, company provide employment opportunities to the local community, the provision of supporting infrastructure for public economic activities, providing employment opportunities information to the public, optimizing the use of local labor, involving the local community as business partners. <p>The Certificate Holder has appoint Estate and Mill Manager together with Sustainability team to control and ensure the implementation of environment plan.</p> <p>Tungkal Ulu Estate start to replant in 2016. Evaluation on Environment Aspect – Impact already conducted prior to replanting activities. Documented evidence using Environmental Management System - ISO 14001 (EMS-431-003-LT). This document is periodically revised according to changes in replanting activities. The latest amendment is Revision 14, dated 14 March 2019.</p> <p>Smallholder: Plasma Tungkal Ulu has set the Environmental aspect and impact assessment as per “Evaluasi Aspek Dampak Lingkungan Kebun Plasma Tungkal Ulu” January 2019. The mitigation plan for environmental aspect and impact has been defined, e.g:</p> <ul style="list-style-type: none"> ➤ Manuring/Fertilizing – monitoring ex fertilizer sack, appropriate fertilizing as recommendation ➤ Weeds control - Ex Herbiicide container store in the hazardous waste storage. ➤ Pest and disease handling: Ex pesticide container store in the hazardous waste storage ➤ FFB transportation: optimizing FFB transportation by designed the TPH (FFB collecting place) in one way along collection road. <p>During site visit, Smallholder are well aware of the environmental impacts and the mitigation plan. For example, the ex fertilizer sack must be handled by collected in Cooperative office to reuse as loose fruit container.</p> | |
| 5.1.3 | Environment monitoring plan document, its implementation report, and the | Estate: | Not Comply (1761451- |

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| | <p>corrective plan (if non-conformance arised from the monitoring result) shall be available. This plan is reviewed on two-yearly basis.</p> <p>- Minor compliance –</p> | <p>Environmental Implementation Report document (RKL-RPL) is frequently report to authority bodies (Dinas Lingkungan Hidup) twice a year. According to document verification and evidence collected during surveillance, describe as follow:</p> <ol style="list-style-type: none"> 1. Document of "Laporan Pelaksanaan Izin Lingkungan" period Jan-Jun 2018, report submitted on 13 August 2018. Report sent by delivery service to regency and provincial authority. 2. Document of "Laporan Pelaksanaan Izin Lingkungan" period Jul-Dec 2018, report submitted on 13 August 2018. Report submitted through Environmental Information System (SIMPEL) application with ID: 1549615342-456, dated 8 February 2019. <p>Escalate to MAJOR. No evidence that Soil Analysis conducted twice a year as environment management and monitoring plan directive (matriks RKL-RPL). There is no justification if matrix "pemantauan" amended and informed officially.</p> <p>Soil Quality Analysis Report from BINALAB, No: 104-2/BINA/V/2018, dated 23 April 2018. Soil analysis remain conducted once a year, therefore it is not comply as required by environment management plan (RPL).</p> <p>Smallholder: Monitoring for the implementation to monitor the effectiveness of the mitigation measures available in document "Program Manajemen Lingkungan", updated on January 2019. All the members have attended the socialization for Environmental Risk that cover all the environmental impacts identified in the operations in the oil palm plantations.</p> | <p>201905-M2) Comply</p> |
| <p>Criterion 5.2 The status of rare, threatened or endangered species and other High Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and operations managed to best ensure that they are maintained and/or enhanced.</p> | | | |
| <p>5.2.1</p> | <p>Record(s) on the results of High Conservation Value (HCV assessment) that includes both the planted area and the relevant wider landscape-level considerations (such as wildlife corridors) shall be available.</p> | <p>Estate and Smallholder: Company has conducted HCV identification on 28 February – 11 March 2011 cooperation with "Fakultas Kehutanan Institut Pertanian Bogor". Final report presented in "Laporan Final Kajian Penuh Identifikasi dan Analisis Keberadaan High Conservation Value di Areal PT. Inti Indosawit Subur – Tungkal Ulu Estate, Provinsi Jambi". The HCV assessment conducted based on "Panduan Kawasan</p> | <p>Comply</p> |

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| | <p>- Major compliance -</p> | <p>Bernilai Konservasi Tinggi di Indonesia”, issued by Konsorsium Revisi HCV Toolkit Indonesia dated 12 July 2008.</p> <p>HCV identified in Tungkal ulu Estate total 128.322 ha consist of: HCV 1.2 and 4.1: Benanak river 81.9 ha, Lampisi river 8.15 ha, Jitan river 4.48, Serayu river 5.54 ha, Beranak-1 small river 8.58 ha, Beranak-2 small river 7.32 ha, Serayu small river 3.04 ha, pool water reservoir area.</p> <p>HCV 6. Makam Panjang Datuk ratu 0.0025 ha, Kuburan Desa Lampisi-1 (Lampisi I Village Graveyrd) 0.5 ha, Kuburan Desa lampisi-2 (Lampisi II Village Graveyard) 0.5 ha, Kuburan Desa Tanjung Beranak (Tanjung Beranak Village Grveyard) 2 ha, Kuburan Desa Bukit Harapan (Bukit Harapan Village Graveyard) 0.25 ha, Kuburan Desa Pinang Gading (Pinang Gading Village Graveyard) 2 ha.</p> <p>The HCV identification document has explained the general condition of landscape surrounding company’s plantation: there is no protected forest/ecosystem that feasible for wildlife to maintain its viability. Therefore no recommendation for wildlife corridor.</p> | |
| <p>5.2.2</p> | <p>Whererare, threatened or endangered (RTE) species and or other HCVs are present or affected by the plantation and mill operations, an appropriate measures that are expected to maintain or enhance them shall be implemented through a management plan.</p> <p>- Major compliance -</p> | <p>Estate: RTE species in PT. Inti Indosawit subur Tungkal ulu were identified such as:</p> <ul style="list-style-type: none"> - Babi Jenggot (Sus barbatus) status IUCN VU - Kera Ekor Panjang (Macaca fascicularis) CITES Appendix II - Beruk (Macaca nemestrina) status IUCN VU - Kucing kuwuk (Prionailurus bengalensis) protected by regulation PerMenLHK Nomor P.20/MENLHK/SETJEN/KUM.1/6/2018 - Trenggiling (Manis javanica) protected by regulation PerMenLHK Nomor P.20/MENLHK/SETJEN/KUM.1/6/2018 - Musang Luwak (Paradoxurus hermaphroditus) CITES Appendix III - Raja Udang (Alcedo sp) protected by regulation PerMenLHK Nomor P.20/MENLHK/SETJEN/KUM.1/6/2018 - Elang hitam (Ictinaetus malaiensis) protected by regulation PerMenLHK Nomor P.20/MENLHK/SETJEN/KUM.1/6/2018 - Kipasan belang (Rhipidura javanica) protected by regulation PerMenLHK Nomor P.20/MENLHK/SETJEN/KUM.1/6/2018 | <p>Comply</p> |

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| | | <ul style="list-style-type: none"> - Cekakak belukar/sungai (Tordirhampus sp) protected by regulation PerMenLHK Nomor P.20/MENLHK/SETJEN/KUM.1/6/2018 - Elang brontok (Nisaetus cirrhatus) protected by regulation PerMenLHK Nomor P.20/MENLHK/SETJEN/KUM.1/6/2018 - Betet ekor panjang (Tanygnathus sumatranus) protected by regulation PerMenLHK Nomor P.20/MENLHK/SETJEN/KUM.1/6/2018 - Buaya senyulong (Tomistoma schlegeii) protected by regulation PerMenLHK Nomor P.20/MENLHK/SETJEN/KUM.1/6/2018 <p>The Company has made a conservation management and monitoring plan to protect and conserve RTE species and monitor the presence of wildlife species and wildlife populations as well as protected plants/animal in and around the plantation.</p> <p>Wildlife monitoring is conducted monthly by foreman and clerk afedling/division. The animal/species findings are recorded in the "Daftar Temuan Satwa liar di Areal kebun" form. Evidence of wildlife monitoring can be demonstrated. For example monitoring on December 2018. Based on monitoring result, there is no disturbance of HCV area and the riparian area are well protected and well grown the vegetation. RTE species found during monitoring such as: <i>Macaca fascicularis</i>, <i>Bucheros sp</i>, <i>Halcyon smyrnensis</i>, <i>Macaca nemestrina</i>, <i>Pelargopsis sp</i>, <i>Graculus religiosa</i>, etc.</p> <p>HCV management and monitoring including Flora and fauna monitoring reported each semester to BKSDA (Natural Resources Conservation Body) Jambi Province, lates report semester II 2018 reproted on 09 May 2019.</p> <p>Smallholder: Plasma Tungkal Ulu has develop a mechanism for individual members to report on threats to HCVs in "Mekanisme Pelaporan Perjumpaan Satwa dan Tumbuhan Dilindungi" SOP No. 028/DOK/SOP/AA/2016.</p> <p>Smallholder member should report the presence of rare, threatened and Endangered species (protected species) to head of KT and ICS Manager, then review the member reports for further action. Plasma Tungkal Ulu has disseminate farmer reporting mechanisms related to the threat of HCV in the plasma estate area.</p> | |
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| | | <p>During interview with smallholder member in KUD they were aware against the protected species and the mechanism to report the RTE species.</p> <p>Plasma Tungkal Ulu also has a program to monitor the RTE species each month. Record seen:</p> <ul style="list-style-type: none"> - In KUD Bina Usaha, monitoring from July 2018 – April 2019 found the presence of animal such as: <i>Naja sumatrana</i>, <i>Halcyon smyrnensis</i>, <i>Elanus caeruleus</i>, <i>Mabouya sp</i>, <i>Varanus salvator</i>, <i>Macaca fascicularis</i>. - In Koperasi Manunggal Jaya, monitoring from July 2018 – April 2019 found the presence of animal such as: <i>Phyton reticulatus</i>, <i>Halcyon smyrnensis</i>, <i>Varanus salvator</i>. - In KUD Argo Makmur, monitoring from July 2018 – April 2019 found the presence of animal such as: <i>Naja sumatrana</i>, <i>Phyton sp</i>, <i>Prionailurus bengalensis</i>, <i>Halcyon smyrnensis</i>, <i>Elanus caeruleus</i>, <i>Mabouya sp</i>, <i>Varanus salvator</i>, <i>Macaca fnemestrina</i>, <i>Anthreptes malaccensis</i>. - In KUD Harapan Jaya, monitoring from July 2018 – April 2019 found the presence of animal such as: <i>Naja sumatrana</i>, <i>Elanus caeruleus</i>, <i>Varanus salvator</i>. | |
| 5.2.3 | <p>Program(s) to socialize the status of protected, rare, threatened or endangered (RTE) to all workers shall be available, including records of appropriate sanction disciplinary measures to any individual working for the company who is found to capture, harm, collect or kill these species.</p> <p>- Minor compliance –</p> | <p>PT. Inti Indosawit Subur has a program to socialize the status of protected, rare, threatened or endangered (RTE) to all workers. Socialization has been conducted through master morning in each division by field assistant, latest refreshment to workers on 7 February 2018. Company also provides signboard regarding HCV protection and RTE species protection in the strategic place as a campaign to give awareness to the workers/people.</p> <p>Company also impelemented appropriate sanction disciplinary measures to any individual working for the company who is found to capture, harm, collect or kill these species. Sanction and process based on UU No. 5 tahun 1990.</p> <p>Based on interview with worker representative and field workers they understand the protection of plant and animal. The workers also aware of company policy prohibits hunting, raising and killing protected animal. Based on interview with worker representative and field workers – workers understand the protection of plant and animal. The workers also aware of the company policy which prohibits hunting, raising and killing protected animal.</p> <p>Refreshment socialization and awareness regarding HCV and wildlife protection performed by company through muster morning in each division/afdeling PT. Inti Indosawit Subur Muara Bulian</p> | Comply |

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| | | <p>Estate and POM, for example refreshment on 7 February 2018 in Tungkal Ulu POM. Awareness to surrounding community performed once a year, latest socialization performed in 12 February 2018.</p> <p>Smallholder: Training & Socialization has been provided to the individual members about the status of HCV and RTE species and the applicable disciplinary measures. Training was conducted in each KUD by plasma management, sample seen:</p> <ul style="list-style-type: none"> - In KUD Bina Usaha, HCV refreshment training and socialization conducted on 16 April 2019, attended by 19 participants. - In KUD Argo Makmur, HCV refreshment training and socialization conducted on 5 Maret 2019, attended by 23 participants. - In Koperasi Manunggal Jaya, HCV refreshment training and socialization conducted on 27 February 2019, attended by 28 participants. - In KUD Harapan Jaya, HCV refreshment training and socialization conducted on 21 Maret 2019, attended by 25 participants. <p>Attendant list and minutes of training was available.</p> <p>The members are understand the ways of communication such as through meeting with field assistants, notice displayed on the notice board in KUD office and Plasma Tungkal Ulu and the guideline in "Buku Pintar petani plasma" has distributed to each of the members. During interview with smallholder member, they are aware regarding the HCV and animal protection in their block.</p> | |
| 5.2.4 | <p>Once the management plan is prepared, continuous monitoring documentation and report regarding the status of the RTE and HCVs are affected by the operations of the plantation and palm oil mill shall be available, and the results of monitoring are to be used to follow-up on the improvement of the management plan.</p> | <p>Continous monitoring documentation and report regarding the status of RTE species and HCV presented in "Laporan Monitoring tumbuhan dan Satwaliar PT Inti Indosawit Subur, Kebun Tungkal Ulu" Periode Juli – Desember 2018.</p> <p>Monitoring documentation such as: "Daftar Temuan Satwa liar di Areal kebun" contain information regarding result of wildlife and RTE species monitoring, "Tabel Monitoring Kerusakan kawasan lindung" contain information regarding result of HCV area monitoring and HCV condition monitoring such as illegal hunting, HCV area disturbance, and HCV condition. Latest monitoring both RTE species and HCV area conducted on December 2018. Based on monitorin result, there is no disturbance of HCV area and the riparian area are well protected and well grown the vegetation.</p> | Comply |

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| | <p>- Minor compliance –</p> | <p>RTE species found during monitoring such as: <i>Macaca fascicularis</i>, <i>Bucheros sp</i>, <i>Halcyon smyrnensis</i>, <i>Macaca nemestrina</i>, <i>Pelargopsis sp</i>, <i>Graculus religiosa</i>, etc.</p> <p>Evaluation of the effectiveness of management and monitoring plan implementation reported each semester in "laporan Monitoring tumbuhan dan Satwaliar PT. Inti Indosawit Subur, Kebun Tungkal Ulu".</p> <p>Evaluation result and recommendation of management and monitoring contain in the report. This recommendation give the feedback and improvement to conservation management plan.</p> <p>Report of Management and Monitoring for HCV and RTEs is reported every 6 months and review is conducted regularly to ensure that monitoring is effective. Reports second half 2018 (Semester II period June – December 2018) can be demonstrated. Results of monitoring was evaluated using trend evaluation.</p> <p>Based on field verification, company has demonstrated effort for management and monitoring of HCV area.</p> <p>Smallholder: KUD/Cooperatives has assigned the personal in charge who responsible for monitoring the regulation compliance and updating the regulation compliance evaluation. PIC for regulation compliance monitoring has determined based on:</p> <ul style="list-style-type: none"> - "Surat Keputusan Pengurus Koperasi Manunggal Jaya Desa Adipura , Kecamatan Merlung Nomor: 01/Kpts/KUD-KMJ/II/2019 Tentang Penunjukan/Pengangkatan Pengurus Perlindungan Satwa Liar Koperasi Manunggal Jaya" dated 22 January 2019, PIC assigned MR. Jumari - "Surat Keputusan Pengurus KUD Harapan Jaya Desa Kemang Manis, Kecamatan Muara Papalik Nomor: 01/Kpts/KUD-HJ/II/2019 Tentang Penunjukan/Pengangkatan Pengurus Pengurus Perlindungan Satwa Liar KUD Harapan Jaya" dated 22 January 2019, PIC assigned Mr. Sahrul Hadi. - "Surat Keputusan Pengurus KUD Bina Usaha Desa Cinta Damai, Kecamatan Renah Mendaluh Nomor: 01/Kpts/KUD-BU/II/2019 Tentang Penunjukan/Pengangkatan Pengurus Perlindungan Satwa Liar KUD Bina Usaha" dated 21 January 2019, PIC assigned Mr. Gufron. | |
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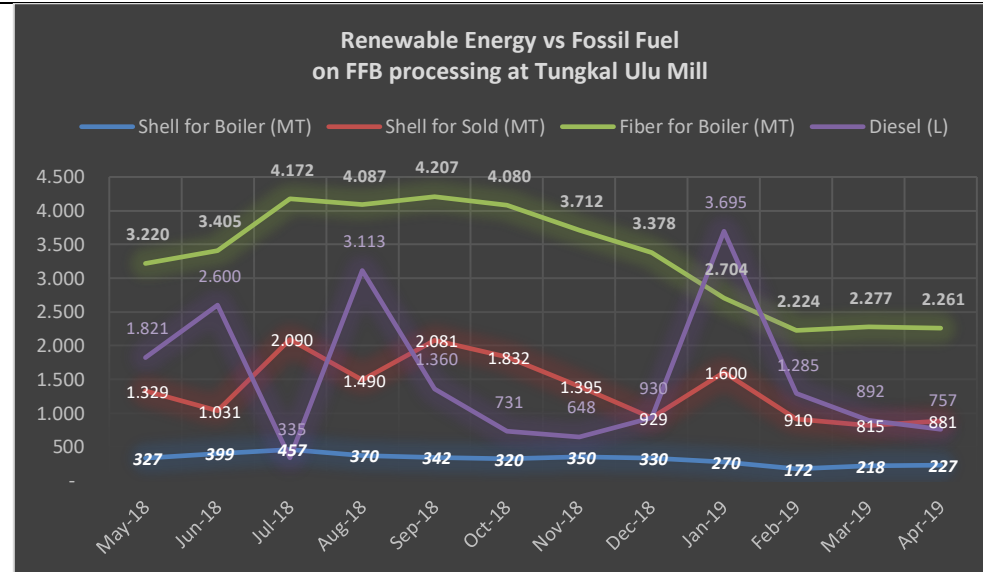
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| | | <ul style="list-style-type: none"> - "Surat Keputusan Pengurus KUD Argo Makmur Desa Bukit Indah, Kecamatan Muara Papalik Nomor: 01/Kpts/KUD-AM/II/2019 Tentang Penunjukan/Pengangkatan Pengurus Perlindungan Satwa Liar KUD Argo Makmur" dated 21 January 2019, PIC assigned Mr. Giman. <p>Plasma Tungkal Ulu has develop a mechanism for individual members to report on threats to HCVs in "Mekanisme Pelaporan Perjumpaan Satwa dan Tumbuhan Dilindungi" SOP No. 028/DOK/SOP/AA/2016.</p> <p>Smallholder member should report the presence of rare, threatened and Endangered species (protected species) to head of KT and ICS Manager, then review the member reports for further action. Plasma Tungkal Ulu has disseminate farmer reporting mechanisms related to the threat of HCV in the plasma estate area.</p> <p>During interview with smallholder member in KUD they were aware against the protected species and the mechanism to report the RTE species.</p> <p>Plasma Tungkal Ulu also has a program to monitor the RTE species each month. Record seen:</p> <ul style="list-style-type: none"> - In KUD Bina Usaha, monitoring from July 2018 – April 2019 found the presence of animal such as: <i>Naja sumatrana</i>, <i>Halcyon smyrnensis</i>, <i>Elanus caeruleus</i>, <i>Mabouya sp</i>, <i>Varanus salvator</i>, <i>Macaca fascicularis</i>. - In Koperasi Manunggal Jaya, monitoring from July 2018 – April 2019 found the presence of animal such as: <i>Phyton reticulatus</i>, <i>Halcyon smyrnensis</i>, <i>Varanus salvator</i>. - In KUD Argo Makmur, monitoring from July 2018 – April 2019 found the presence of animal such as: <i>Naja sumatrana</i>, <i>Phyton sp</i>, <i>Prionailurus bengalensis</i>, <i>Halcyon smyrnensis</i>, <i>Elanus caeruleus</i>, <i>Mabouya sp</i>, <i>Varanus salvator</i>, <i>Macaca fmemestrina</i>, <i>Anthreptes malaccensis</i>. - In KUD Harapan Jaya, monitoring from July 2018 – April 2019 found the presence of animal such as: <i>Naja sumatrana</i>, <i>Elanus caeruleus</i>, <i>Varanus salvator</i>. | |
| 5.2.5 | Where HCV areas overlapped with an identified local community's land, there shall be evidence of a negotiated agreement that optimally safeguard their HCVs and the local community's rights. | All HCV and conservation areas within the company areas. Based on document verification, field visit and interview with stakeholders, there was no HCV area under existing rights of local community. | Comply |

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| | - Minor compliance – | | |
| Criterion 5.3 | | | |
| Waste is reduced, recycled, re-used and disposed of in an environmentally and socially responsible manner. | | | |
| 5.3.1 | A documented identified source of all waste and pollution, shall be available. - Major compliance - | <p>Mill and Estate: Waste products has been identified and documented under the “Evaluasi Aspek-Dampak Lingkungan” (Environmental Aspect impacts EMS-431-003-LT). This document is updated once a year, last update is Revision 14, dated 14 March 2019. This document covering all operation in Estates and mill.</p> <p>All polluting activities has been assessed including emission from boiler and generator, effluent from mill waste water, particulate from boiler stack, noise, used lubricant and filter, old battery, used laboratory chemical, clinical/medical waste, mill effluent, EFB, smoke, dust, fiber and shell, empty agrochemical container, boiler ash, scrap iron, used tires, waste water and domestic household refuse.</p> <p>PT Inti Indosawit Subur – Tungkal Ulu POM and Estate has a waste management plan, identifying type and source of waste and the disposal plan. PT Inti Indosawit Subur – Tungkal Ulu POM and Estate prepared a procedure to handle hazardous waste titled “Prosedur Penanganan Limbah B3” No. AA-KL06-EFP explains methods to collecting the waste, recording in balance and disposal through licensed third party transporter. The company store hazardous waste in temporary storage with permit. The hazardous waste is sent to the registered collector/transporter which approved by Environmental Ministry, namely PT. Indostar Cargo. There is a mechanism “Mekanisme Penanganan Sampah Domestik” to segregate organic and inorganic waste, further to re-use or re-cycle inorganic domestic waste (such as plastic) and composting the organic domestic waste. Company has disseminated the mechanism of domestic waste handling to all employee and resident of emplacement. Domestic waste resulted form domestic housing resident segregated activity. Company provide the organic and anorganic trash can in each housing area. There are personel/workers who has been trained to collect the organic and anorganic waste and transport to landfill (TPSA).</p> | Comply |

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| | | <p>Smallholder: Plasma Tungkal Ulu has set the Environmental aspect and impact assessment as per "Evaluasi Aspek Dampak Lingkungan Kebun Plasma Tungkal Ulu" January 2019. The mitigation plan for environmental aspect and impact has been defined, e.g:</p> <ul style="list-style-type: none"> ➢ Manuring/Fertilizing – monitoring ex fertilizer sack, appropriate fertilizing as recommendation ➢ Weeds control - Ex Herbicide container store in the hazardous waste storage. ➢ Pest and disease handling: Ex pesticide container store in the hazardous waste storage ➢ FFB transportation: optimizing FFB transportation by designed the TPH (FFB collecting place) in one way along collection road <p>During site visit, Smallholder are well aware of the environmental impacts and the mitigation plan. For example, the ex fertilizer sack must be handled by collected in Cooperative office to reuse as loose fruit container.</p> | |
| <p>5.3.2</p> | <p>There shall be evidence that all chemicals and their empty containers are disposed of responsibly.</p> <p>- Major compliance -</p> | <p>Mill and Estate: PT. Inti Indosawit Subur Tungkal Ulu collects all hazardous waste from estate into temporary hazardous waste storage in workshop compound. The temporary hazardous waste storage has valid permit according to:</p> <ul style="list-style-type: none"> ➢ "Surat Izin Kepala Badan Lingkungan Hidup Kabupaten Tanjung Jabung Barat Nomor: 660/476/IX/BLHD/2014 Tentang izin Penyimpanan Sementara Limbah B3 PKS PT Inti Indosawit Subur", dated 23 September 2014 valid for 5 years. The permit covers used oil, used filter, used battery, used lamp, ex chemical container, used electronic, hand gloves, contaminated goods, ex laboratory analysis waste and used paint can. The hazardous waste with storage time 180 days with production less than 50 kg/day. ➢ "Keputusan Kepala Badan Lingkungan Hidup Kabupaten Tanjung Jabung Barat Nomor: 660/487/IX/BLHD/2014 tentang Izin Penyimpanan Sementara Limbah Bahan Berbahaya dan Beracun (B3) Perkebunan PT. Inti Indosawit Subur" dated 29 September 2014, valid for 5 years. The permit covers used oil, used filter, used battery, used lamp, ex chemical container, used electronic, hand gloves, contaminated goods, ex laboratory analysis waste and used paint can. The hazardous waste with storage time 180 days with production less than 50 kg/day. | <p>Comply</p> |

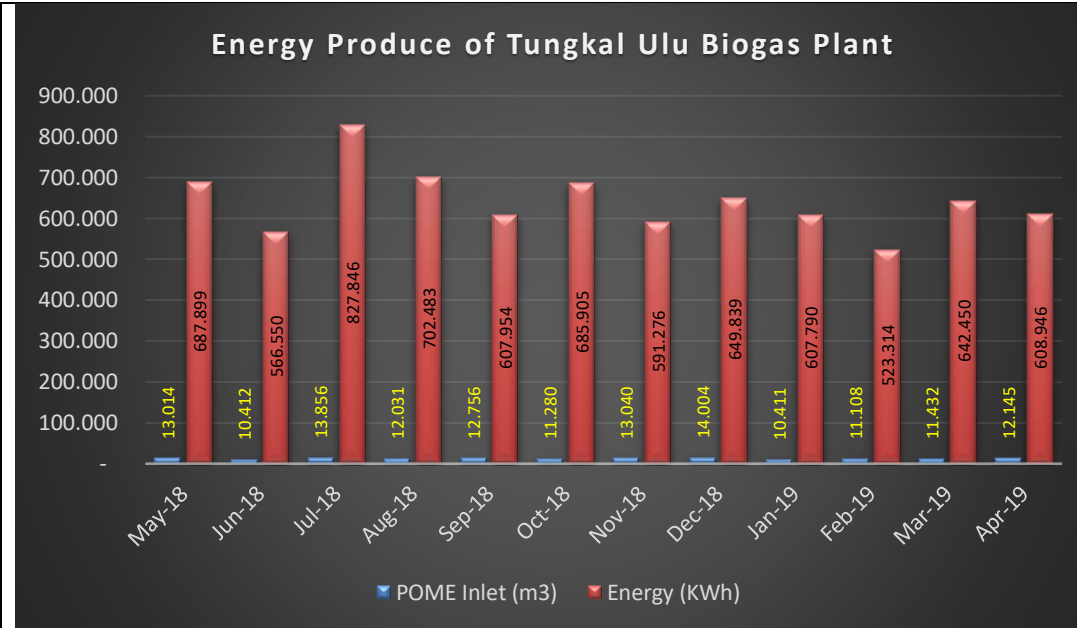
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| | | <p>PT. Inti Indosawit Subur - Tungkal Ulu has an agreement in transporting the hazardous waste with contractor that has an Environmental license. PT. Indostar Cargo as hazardous waste transporter has a valid license from Ministry of Environmental No.B.14559/Dep.IV/LH/PDAL/12/2014.</p> <p>Based on field visit at hazardous waste storage at Mill and Estate, all the chemical containers are kept safely inside the storage and completed with identity of each type of waste.</p> <p>Evidence sighted "Berita Acara Pengambilan Limbah B3 PT. IIS – Kebun Tungkal Ulu", dated 14 January 2019. Transporter and collector: PT. Indostar Cargo. Transport license: SK KLHK No: S.306/VPLB3/PPLB3/PLB.3/4/2017, dated 6 April 2017.</p> <p>Hazardous waste transported:</p> <ol style="list-style-type: none"> 1. Lubricant use: 800 L (4 drum). 2. Lubricant dirt: 200 L (1 drum). 3. Medical waste: 40 kg (1 bucket). 4. Chemical containers: 540 kg (18 drum). 5. Battery used: 17 pcs. <p>Smallholder: Hazardous waste from Smallholder are collected and handled by the company, particularly on pesticide containers.</p> | |
| 5.3.3 | <p>A documented waste management plan to avoid or reduce pollution and its implementation shall be available.</p> <p>- Minor compliance –</p> | <p>Mill and Estate: Waste management plan is documented in "Rencana pengelolaan Limbah". Waste management consists of medical waste, domestic waste, and hazardous waste to reduce pollution into the environment. Company also prepare waste management plan according to procedure such as:</p> <ul style="list-style-type: none"> ➢ Domestic waste, managed by segregation of organic and inorganic waste, transport the waste to sanitary landfill ➢ Liquid domestic waste, managed by providing septic tank and trench each house ➢ Solid waste resulted from mill such as: shell and fiber used as boiler fuel, EFB applied to plantation used as mulched and organic fertilizer ➢ Liquid waste from mill managed by application to plantation as fertilizer (Land application) ➢ Hazardous waste resulted from mill and estate managed by store in the temporary storage which has licensed and delivered to licensed transporter and collector. | Comply |

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| | | <ul style="list-style-type: none"> ➤ Waste of used goods/scrap, collect and sell to vendors ➤ Air emission, water and soil pollutant managed by dust collector installation <p>The company has socialized to the workers and their families who are stay in housing complex to aware on the disposal of domestic waste to the separate waste bin (organic and an-organic). Based on field visit in estate and mill housing complex, it was found that organic and an-organic waste is separated in waste bin and also found no scattered waste. All domestic waste is disposed to the landfill (Tempat Pengumpulan Akhir Sampah).</p> <p>Based on field visit at workers housing complex, domestic waste already collected in the landfill.</p> <p>Smallholder: Plasma Tungkal Ulu has set the Environmental aspect and impact assessment as per "Evaluasi Aspek Dampak Lingkungan Kebun Plasma Tungkal Ulu" January 2019. All the smallholder members have attended the training on waste management and disposal in the oil palm plantations. Operational control to prevent the pollution has been determined by Cooperative (KUD) according to procedure AA-KL-06-EFP "Penanganan Limbah Bahan Berbahaya dan Beracun". Sample seen in KUD Bina Usaha, KUD Manunggal Jaya, KUD Argo Makmur and KUD Harapan Jaya. There is also a mechanism to handle domestic waste in KUD "Mekanisme Penanganan Sampah Domestik" to segregate organic and inorganic waste, further to reuse or re-cycle inorganic domestic waste (such as plastic) and composting the organic domestic waste.</p> | |
| <p>Criterion 5.4 Efficiency of fossil fuel use and the use of renewable energy is optimized.</p> | | | |
| 5.4.1 | <p>A plan for improving efficiency of the use of fossil fuels and to optimize renewable energy shall be in place and monitored.</p> <p>- Minor compliance –</p> | <p>Fossil fuel used versus renewable energy use within May 2018 up to April 2019:</p> | <p>Comply</p> |



In several time (June 2018, August 2018, January 2019) diesel usage are highly used due to maintenance in gas engine.

In other side, Tungkal Ulu Mill has Biogas Plant as improving efficiency and optimizing renewable energy. Total energy produced from Biogas Plant allocated to Mill and Kernel Crushing Plant process. Energy produced from Biogas Plant within May2018 upto Apr2019 as follow:



Smallholder:

Group Manager and ICS Kebun Plasma Tungkal Ulu has prepare a plan for improving efficiency of the use of fossil fuels and to optimise renewable energy, under document "Program Efisiensi Penggunaan Bahan Bakar Fosil dan Energi Terbarukan", following plan to mitigate polluting activities, i.e:

- Optimizing FFB transportation by designed the TPH (FFB collecting place) in one way at collection road.
- Fossil fuel efficiency by test run and regular service of dump truck.

Criterion 5.5

Use of fire for preparing land or replanting is avoided, except in specific situations as identified in the ASEAN guidelines or other regional best practice.

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| <p>5.5.1</p> | <p>Records of land clearing with zero burning shall be available, referring to the ASEAN Policy on Zero Burning (2003) or other recognised techniques based on the existing regulations. - Major compliance -</p> | <p>It was noted that Tungkal Ulu Estate has conducted replanting activities since 2016. Procedure of Replanting was documented in SOP AA-APM-OP-1100.20-R6 dated 16 February 2017. The procedure described the company commitment to "Zero Burning" by using chipping and stacking using excavator by bucket modification. Procedure of replanting mentioned that Field Assistant, Head Assistant and Estate Manager must perform checks to ensure that the contractor does not perform burning for land preparation for replanting. In the procedure of replanting mentioned that, the methods used are: Toppling trees using heavy equipment (excavators); Chipping: cutting palm trunk, so as not infected with ganoderma; Planting LCC, so that the decay of the old oil palm trunks can be faster; Planting of oil palm. This method has been used in replanting the whole plantation belonging to Asian Agri group including PT Inti Indosawit Subur – Muara Bulian Estate.</p> <p>The company has also established Company Policy signed by Managing Director, Kevin Tio, on 1 December 2014. Point 6 of the policy stated the company uses Zero Burning practice in developing plantation and actively support initiative to prevent and monitor forest fire and haze. Based on field observation to Block B91c that will become B18k, it was evident that no fire has been used for replanting in Muara Bulian Estate.</p> <p>In 2019 replanting activity was performed by contractor. Agreement contract and work instruction for replanting cover in "Konfirmasi pekerjaan Replanting Tahun 2019" , the contract covering the detail of replanting activity consist of: Tumbang, chipping, Bongkar akar, merumpuk, tutup lubang, teresan, buat jalan, cuci parit. Based on contract it can ne demonstrated that the contractor are obliged to obey the PT Inti Indosawit Subur procedure and policy including OHS, environment and zero burning. During field visit in replanting activity at Division I Tungkal Ulu Estate can be shown that all replanting activity performed mechanically without burning.</p> <p>All the replanting activities requires to be documented and monitored, such as: Schedule of replanting (chipping, digging and planting), progress planting LCC (Legume Cover Crop) and Minutes Works replanting (Progress in the Works Contractor).</p> <p>Smallholder: The Smallholder Manager has prepared the policy that there were no land preparation by burning, as per "<i>Kebijakan Manager Plasma Tungkal Ulu</i>" dated 2 January 2018, in poin 6: "<i>Melakukan praktek tanpa bakar dalam kegiatan pembangunan perkebunan dan petani maupun desa secara</i></p> | <p>Comply</p> |
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| | | <i>aktif mendukung inisiatif mencegah mengawasi kebakaran hutan dan asap"</i> (Implementing non-burning practices in plantation development activities, farmers and villages actively support initiatives to prevent and control forest fires and smoke). The policy has communicated to individual member and available in guidance book (Buku Pintar Petani) which distributed to all farmers as well as the information display on the notice board in filed also emphasize on the no use of fire policy. | |
| 5.5.2 | Where fire has been used for eradication of pest during replanting, the records of the analysis of the use of fire and permit from the authorised agency shall be available. - Minor compliance - | <p>Estate: Based on field observation to replanting activity at Division I Tungkal Ulu Estate, land clearing was conducted by chipping and stacking, no fire used during replanting. It was also evident that no fire has been used for eradication of pest during replanting in Tungkal Ulu Estate.</p> <p>Smallholder: There is no replanting activity in KUD Bina Usaha, KUD Harapan Jaya, KUD Argo Makmur and Koperasi Manunggal Jaya. However, replanting plan has been set by KUD under supervised by PT Inti Indosawit Subur and replanting activity in smallholder was follow the company procedure accordingly without burning (zero burning).</p> | Comply |
| <p>Criterion 5.6 Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.</p> | | | |
| 5.6.1 | Document(s) assessing pollution and emission sources, including gaseous, particles, soot emissions and effluent, shall be available. (see Criterion 4.4) - Major compliance - | <p>Mill and Estate: List for assessing pollution and emission sources, including gaseous, particles, soot emissions and effluent provided in document "Identifikasi Aspek Dampak Lingkungan untuk PMKS dan Estate di Tungkal Ulu", dated 14 March 2019.</p> <p>The identification listed all relevant activities that generate pollution and emission from office, plantations, palm oil mill, mill effluent treatment up to workers activities, such as:</p> <ul style="list-style-type: none"> ➢ Boiler stack emission including particulate and soot ➢ Diesel electric generator emission ➢ POME methane emission ➢ Use of fertilizer ➢ Use of Pesticide | Comply |

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| | | <ul style="list-style-type: none"> ➤ Diesel fuel usage ➤ Vehicle and heavy equipment emission <p>All the activities of mill and estate as well as the waste generated has been well documented, for examples the operational activities from generator is generates air emissions, the company conducts periodic generator maintenance and perform quality measurement of exhaust emissions each semester to ensure air quality is comply with standard regulation.</p> <p>The company has developed pollution and emission reduction plan. The plan covers planning, implementing plans and monitoring activities generating pollution and emission. Reduction of pollution such as:</p> <ul style="list-style-type: none"> ➤ POME application/Land application permitted for plantation in mineral soil. ➤ Hazardous waste storage management and monitoring (permitted by government) ➤ Domestic waste management by sanitary landfill ➤ Emission measurement each semester from Boiler, Genset, Heavy equipment and vehicle. ➤ Biogas Plant with capacity 3 MW. <p>Smallholder: Document(s) assessing pollution and emission sources, including gaseous, particles, soot emissions and effluent has been provided by Group Manager Plasma Tungkal Ulu as per "Identifikasi Sumber Polusi di Perkebunan Petani" dated 3rd April 2019.</p> <p>During audit, sampled seen in KUD Bina Usaha, KUD Manunggal Jaya, KUD Argo Makmur and KUD Harapan Jaya. Plasma Tungkal Ulu has identified the significant potential environmental impacts deriving from operational activities such as: fertilizing, weeds control, pest and disease.</p> | |
| 5.6.2 | <p>Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plan to reduce or minimize them implemented.</p> <p>- Major compliance -</p> | <p>To reduce and minimize GHG, Tungkal Ulu POM has installed and operated Biogas Plant since 2017. Energy produced from Biogas Plant within May 2018 upto Apr 2019 as follow:</p> | Comply |

| | | <p style="text-align: center;">Energy Produce of Tungkal Ulu Biogas Plant</p> <table border="1"> <thead> <tr> <th>Month</th> <th>POME Inlet (m3)</th> <th>Energy (KWh)</th> </tr> </thead> <tbody> <tr><td>May-18</td><td>13,014</td><td>687,899</td></tr> <tr><td>Jun-18</td><td>10,412</td><td>566,550</td></tr> <tr><td>Jul-18</td><td>13,856</td><td>827,846</td></tr> <tr><td>Aug-18</td><td>12,031</td><td>702,483</td></tr> <tr><td>Sep-18</td><td>12,756</td><td>607,954</td></tr> <tr><td>Oct-18</td><td>11,280</td><td>685,905</td></tr> <tr><td>Nov-18</td><td>13,040</td><td>591,276</td></tr> <tr><td>Dec-18</td><td>14,004</td><td>649,839</td></tr> <tr><td>Jan-19</td><td>10,411</td><td>607,790</td></tr> <tr><td>Feb-19</td><td>11,108</td><td>523,314</td></tr> <tr><td>Mar-19</td><td>11,432</td><td>642,450</td></tr> <tr><td>Apr-19</td><td>12,145</td><td>608,946</td></tr> </tbody> </table> <p>The Certificate Holder has improve their activities to reduce significant GHG.</p> <p>Smallholder: Significant pollutant and GHG from Smallholder sourced from fertilizer and pesticide used.</p> | Month | POME Inlet (m3) | Energy (KWh) | May-18 | 13,014 | 687,899 | Jun-18 | 10,412 | 566,550 | Jul-18 | 13,856 | 827,846 | Aug-18 | 12,031 | 702,483 | Sep-18 | 12,756 | 607,954 | Oct-18 | 11,280 | 685,905 | Nov-18 | 13,040 | 591,276 | Dec-18 | 14,004 | 649,839 | Jan-19 | 10,411 | 607,790 | Feb-19 | 11,108 | 523,314 | Mar-19 | 11,432 | 642,450 | Apr-19 | 12,145 | 608,946 | |
|--------|---|---|--------|-----------------|--------------|--------|--------|---------|--------|--------|---------|--------|--------|---------|--------|--------|---------|--------|--------|---------|--------|--------|---------|--------|--------|---------|--------|--------|---------|--------|--------|---------|--------|--------|---------|--------|--------|---------|--------|--------|---------|--|
| Month | POME Inlet (m3) | Energy (KWh) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| May-18 | 13,014 | 687,899 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Jun-18 | 10,412 | 566,550 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Jul-18 | 13,856 | 827,846 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Aug-18 | 12,031 | 702,483 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Sep-18 | 12,756 | 607,954 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Oct-18 | 11,280 | 685,905 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Nov-18 | 13,040 | 591,276 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Dec-18 | 14,004 | 649,839 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Jan-19 | 10,411 | 607,790 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Feb-19 | 11,108 | 523,314 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Mar-19 | 11,432 | 642,450 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Apr-19 | 12,145 | 608,946 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 5.6.3 | <p>A monitoring plan and results of regular reporting on emission and pollutants from estate and mill operations using appropriate methods, shall be available.</p> <p>- Minor compliance –</p> | <p>Mill and Estate: Emission monitoring system by using "RSPO PalmGHG" system calculation. Emission from estate and mill operation was calculated and monitored, emission reduction achieved. The result of GHG calculation available in appendix C.</p> | Comply | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| | | <p>Monitoring of any pollutant has been done in daily, weekly and monthly basis, report of monitoring was recorded in the "RKL/RPL" report, and this report submitted to the related institution every 6 month. The company has prepared a strategy in effort to reduce and mitigate pollution and emission. Monitoring of pollution and emission quality for plantation has been planned and implemented, e.g. air quality ambient for boiler and Genset, water quality test for river (upstream and downstream), effluent water quality, noise, etc.</p> <p>Smallholder: Mitigation measures for significant pollutants and identify sources of emissions is available, under: "Hasil Identifikasi Sumber Polusi di Perkebunan Petani (Pencemaran dan Emisi)", updated on January 2019. Emission monitoring system by using "RSPO PalmGHG" system calculation as above. Emission from Plasma Tungkal Ulu was calculated and monitored, emission reduction achieved.</p> | |
| <p>Principle 6: Responsible consideration of employees and of individuals and communities affected by growers and mills</p> | | | |
| <p>Criterion 6.1 Aspects of plantation and mill management that have social impacts, including replanting, are identified in a participatory way, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.</p> | | | |
| <p>6.1.1</p> | <p>A social impact assessment (SIA) including records of meetings shall be documented. - Major compliance -</p> | <p>PT Inti Indosawti Subur has shown the document of social impact assessment, such as:</p> <ol style="list-style-type: none"> 1. Document of "Social Impact Assessment PT Inti Indosawit Subur Kebun Tungkal Ulu including Scheme Smallholder" on 2011 by Fakultas Kehutanan Institut Pertanian Bogor dated 11 March 2011. This social impact assessment has also done with a direct approach with affected communities by FGD method conducted on 5 to 10 March 2011. Th scope of document is Estate, Mill and Plasma/Smallholder in PT Inti Indosawit Subur Kebun Tungkal Ulu with an area of ± 13,858 Ha, which consists of 4,556 Ha of Inti plantation (Tungkal Ulu Estae and POM) and 10,277 Ha of plasma land area. 2. Social Impact Assessment has also available and mentioned within frame references of AMDAL. PT. Inti Indosawit Subur - Tungkal Ulu POM has demonstrated the document of "Analisis Mengenai Dampak Lingkungan (AMDAL)" consist of document ANDAL, RKL and RPL as approved through "Persetujuan Komisi Amdal Departemen Pertanian No.014/Andal/RKL-RPL/BA/V/1995 tentang Persetujuan ANDAL dan RKL-RPL perkebunan Kelapa Sawit dan Pabrik Minyak Kelapa Sawit PT. Inti Indosawit Subur" dated 3 May 1995. The document covers scope of areal of 32,000 ha consist of Kuala Tungkal Estate 20,000 ha and palm oil mill capacity 90 Tonnes FFB/hour for | <p>Comply</p> |

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| | | <p>Kuala Tungkal. Revision on AMDAL document is available for PT. Inti Indosawit Subur – Tungkal Ulu through "Surat Keputusan Bupati Tanjung Jabung Barat No.309", year 2009, dated 6 June 2009, for 4,614.02 ha.</p> <p>The social risk have been identified for some aspect:</p> <ul style="list-style-type: none"> - Tenurial aspect; - Social aspect related infrastructure; - Employment, industrial relation and workforce absorption aspect; - Environmental aspect; - Relationship in socio-economic interaction with stakeholders around plantation; - Perceptions, expectations and desires of the community against the company; - Forms of land ownership; - Social and economic activity that is required by the community; <p>The consultation methodology including survey (questionnaire), focus group discussion with surrounding communities, Smallholder, and other interested parties. The records of consultation, attendance list of stakeholders participated in 2011 SIA sighted. Evidence of participation with affected parties available in :</p> <ul style="list-style-type: none"> - Figure III-6 related to documentation of PGD with local community in Tanjung Beranak Village – KUD Karya Kita - Figure III-8 related to documentation of PGD with local community in Pinang Gading Village - Figure III-10 related to documentation of PGD with local community in Merlung Village - Figure III-11 related to documentation of PGD with local community in Lubuk Terap Village - Figure III-12 related to documentation of PGD with local community in Penyabungan Village <p>Scheme Smallholder:</p> <p>The social impacts with the participation of internal and external stakeholders such as management, local communities, head of surrounding villages (Cinta Damai Village, Lampisi Village, Tanjung Benanak Village, Bukit Harapan Village, Pinang Gading Village, Adipurwa Village, Intan Jaya Village, Bukit Indah Village and Kemang Manis Village), farmers and workers and the government bodies relate. Evidence of participation with affected parties is to use a questionnaire conducted on June 20, 2011.</p> | |
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| | | Based on interview with farmers that generally farmers understood of the social risk of their operation. | |
| 6.1.2 | There shall be evidence that the assessment has been conducted with the participation of affected parties. - Major compliance - | <p>Assessment of aspects of social impacts is done by several methods, including:</p> <ol style="list-style-type: none"> 1. Focus Group Discussion (FGD) 2. Deep interview 3. Structured Interviews 4. Field observation <p>Evidence of participation with affected parties is to use a questionnaire conducted on March 5-10, 2011, questionnaires has demonstrated at the time of the audit. During the preparation for Social Impact Assessment team and company management have involved communities through interviews and meetings with village peoples, farmers, village officials and regency officials.</p> <p>Smallholder: Social Impact Assessment was conducted as documented in "Social Impact Assessment PT Inti Indosawit Subur Kebun Tungkal Ulu includes Scheme Smallholder" on 2011 by Fakultas Kehutanan Institut Pertanian Bogor. Evidence of participation with affected parties is to use a questionnaire conducted on June 20, 2011.</p> | Comply |
| 6.1.3 | Plans for management and monitoring of social impacts to avoid or reduce negative impacts and promote positive ones, based on social impact assessment, through consultation with the affected parties, shall be available, documented and timetabled, including responsibilities for implementation. - Major compliance - | <p>PT Inti Indosawit Subur – Tungkal Ulu POM has determine of management and monitoring of social impact regularly under document "Rencana Upaya Kelola Sosial" last review on 2nd January 2018, such as:</p> <ul style="list-style-type: none"> – Participation of PT Inti Indosawit Subur - Tungkal Ulu in the maintenance of village roads and production roads is still low, management efforts: provide loans in the form of heavy equipment procurement, sirtu, mountain stone and bridge development with the system of interest credit without interest. – Sorting TBS considered incriminating farmers and fruit criteria is still unclear, management efforts: socialization of TBS criteria overlaid on overlap at harvest, making signboard on cooking TBS criteria and farmer representative participation in sorting PTU to equalize perception of TBS quality criteria | Comply |

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| | | <ul style="list-style-type: none"> - Farmers hope that TBS yard equated with hanparan fruit, management effort: coordinate with PT MSJ to send TBS yard still using DO KUD. - Appearing TBS middlemen that inhibit the development of KUD, management efforts: consolidation of Farmers Group formation from a broke ground. - Farmers need company assistance in preparation of replanting, management effort: Socialization of IDAPERTABUN program (Contribution fund of plantation crop estate) in cooperation with Bumi Putera insurance. <p>Management and monitoring of social impact trough consultation with the affected parties performed on 24-25 March 2018, responded taken sample: e.g: namely Asim, Rakimin from Desa Cinta Damai Village, Sutarno, Suctpto from Lampisi Village, Hariyanto, Sodikin from Tanjung Benaak Village, Taryo, Sudrajat from Bukit Harapan Village, etc.</p> | |
| 6.1.4 | <p>The documented plan for management and monitoring of social impacts, shall be reviewed at least on two-yearly basis. If necessary, the plan should be updated. There shall be evidence that the review process includes participation of all affected parties.</p> <p>- Minor compliance –</p> | <p>PT Inti Indosawit Sawit – Tungkal was consistent in conducting periodic review of social studies (minimum 2 years basis), from identification of social impacts in 2011, latest review conducted in 2nd January 2018 recorded on "Rencana Kelola Sosial Kebun Tungkal Ulu", such as:</p> <ul style="list-style-type: none"> - Employment opportunities and endeavors, parameters: Total local workforce of more than 50%, management undertaken: by opening a labor dispatch for the surrounding villagers - Replanting Activities, social impacts: Not all farmers have alternative and completed bank debt before the replanting program, management actions: facilitating alternative economic training by involving relevant agencies, vendors and banks, - Road facilities; impact: Transportation of constrained FFB, cross flow of barn and inter-village people is hampered, management effort: make program of road improvement with farmer and company institutional still assist the procurement of heavy equipment which cost by installment by plasma farmer. - Resources; Impact: management of plasma plantations is not optimal due to technical best management of oil palm plantations has not been understood by farmers either self-managed/swadaya. - Management efforts: socialize the practices of BMP da K3 to self-help farmers. - Opportunities of job vacancy for local community: direct announcement and notificatio if there any job opportunities. E.g: Memoradnum of Understanding Nomor: 560/019/MOU- | <p>Not Comply (1761451-201905-N3)</p> |

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| | | <p>NAKER/II/2019 between Government in Tanjung Jabung Barat and PT Inti Indosawit Subur tentang Rekrutmen dan Pemberdayaan Tenaga Kerja Lokal.</p> <p>However, there was 4 of 5 point of plan for management and monitoring of social impacts as in document of Social Impact Assessment Bab VII. "Rencana Kelola Sosial PT Inti Indosawit Subur Kebun Tungkal Ulu" has not been reviewed (dated 2nd January 2018), such as:</p> <ul style="list-style-type: none"> - 7.1. Rencana kelola social aspek tenural: legalitas kemitraan dan plasma WD) - 7.2. Rencana kelola social aspek pola kerjasama: pola kerjasama dan pelatihan pembinaan - 7.3. Rencana kelola social terkait aspek social ekonomi pedesaan dan pemberdayaan masyarakat: pemeliharaan jalan/jembatan desa dan jalan produksi plasma, standar mutu TBS & sortasi, kelembagaan petani, replanting, program bantuan CSR dan permasalahan lainnya. - 7.5. Rencana kelola social terkait permasalahan lingkungan hidup. <p>The review of plan for management and monitoring of social impacts has just for point 7.4 <i>Rencana kelola social aspek ketenagakerjaan PT Inti Indosawit Subur.</i></p> | |
| 6.1.5 | <p>Particular attention shall be paid to the impacts of smallholder schemes (where the plantation includes such a scheme).</p> <p>- Minor compliance –</p> | <p>PT Inti Indosawit Subur – Tungkal Ulu has social impact assessment with scope in Estate, Mill and Plasma/Smallholder in the same report.</p> <p>Social Impact Assessment under "Social Impact Assessment PT Inti Indosawit Subur Kebun Tungkal Ulu including Scheme Smallholder" on 2011 by Fakultas Kehutanan Institut Pertanian Bogor dated 11 March 2011. Where in chapter V addressed specifically on the impact of the presence of PT Inti Indosawit Subur to farmers/communities around either positive or negative effects.</p> <p>Positive Impacts with the existence of partnership partnership with PT Inti Indosawit Subur – Tungkal Ulu has an increase in welfare and standard of living and correspondence result that: 89% of plasma farmers perceive partnership as satisfactory and only 11% considered less satisfactory.</p> <p>Negative impacts that arise include:</p> <ul style="list-style-type: none"> - Perception of plasma farmers: some Smallholder do not know this agreement between PT Inti Indosawit Subur – Tungkal Ulu and PIR-TRANS farmers - The company's contribution to local development is very small - The company's assistance for maintenance of village roads is very poor | Comply |

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| | | <ul style="list-style-type: none"> - Rejuvenation / Replanting: Farmers are still hoping to cooperate with PT Inti Indosawit Subur – Tungkal Ulu, there is no alternative source of family income when the gardens were rejuvenated <p>Smallholder: There was an impact of replanting programme related the scheme smallholder form. Implementation of plasma scheme has been informed to all member especially an area are going to replanting. Several of social impact espsecialy for smallholder scheme, such as:</p> <ul style="list-style-type: none"> - Road facilities; impact: Transportation of constrained FFB, cross flow of barn and inter-village people is hampered, management effort: make program of road improvement with farmer and company institutional still assist the procurement of heavy equipment which cost by installment by plasma farmer. - Resources; Impact: management of plasma plantations is not optimal because the technical BMP of oil palm plantations has not been understood by farmers either self-managed/swadaya., Management efforts: socialize the practices of BMP da K3 to self-help farmers. Replanting Activities, social impacts: Not all farmers have alternative and completed bank debt before the replanting program, management actions: facilitating alternative economic training by involving relevant agencies, vendors and banks | |
| <p>Criterion 6.2</p> | | | |
| <p>There are open and transparent methods for communication and consultation between growers and/or millers, local communities and other affected or interested parties.</p> | | | |
| 6.2.1 | <p>Communication and consultation procedures shall be documented. - Major compliance -</p> | <p>Mill and Estate: Company has developed a communication procedure under "Mekanisme Penanganan Permintaan Informasi Stakeholder "(No. SOP; AA-GL-5008.1-R1) dated 22 August 2011, which explains the company responses against all information request sent by stakeholders including response time of 14 working days after information request accepted. Retention time of the records information is 3 years upon completion.</p> <p>Smallholder: The Consultation and communication procedures is as documented in "Mekanisme Komunikasi, Konsultasi dan Keluhan", dated 3 January 2011. The consultation & communication procedure displayed on the site's public notice board and there was in "Buku Pintar belong to the farmers.</p> | Comply |

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| | | <p>At site, the logbook records of all communications. Stakeholder communication/logbook as records have maintained. Communication with the government authorities and the project partner are through email and has documented as well.</p> <p>The members understood the ways of communication such as through meeting with field assistants, notice displayed on the notice board in KUD and on "Buku Pintar" as hand book for farmers and Oil Palm Management guideline distributed to each of the members.</p> | |
| 6.2.2 | <p>The company shall have official(s) who is responsible for consultation and communications with parties.</p> <p>- Minor compliance -</p> | <p>Mill and Estate: The company has appointed Mr. Sukardi (assistant Humas PT. Inti Indosawit Subur - Tungkal Ulu) by letter from Region Head-3 Jambi No. 012/HRRO3/Memo/01/2014 dated 29 January 2014, concerning to assignment territory that describes the territory of Mr. Sukardi including PT. Inti Indosawit Subur - Tungkal Ulu and PT. Inti Indosawit Subur - Muara Bulian. The assignment letter since on 1 February 2014.</p> <p>Smallholder: Plasma Tungkal Ulu Manager has appointed as the overall responsible person. All communications between the farmer and the Manger Group appointed to responsible by assistant plasma (there are 5 assistants) in Plasma Tungkal Ulu plantations.</p> | Comply |
| 6.2.3 | <p>The company shall have a list of stakeholders, records of communications, including confirmation of receipt and that efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders.</p> <p>- Minor compliance -</p> | <p>Mill and Estate: List stakeholder is available and records of stakeholder's communication and consultation were being documeted into "Buku Masuk". List stakeholder will be updated in every year, the last update on March 2019 consists of around 56 stakeholder was registered.</p> <p>Request of information from stakeholder documented into a logbook "Permintaan Informasi". Up to April 2019 was recoed as many 105 request for information from stakeholder, such as:</p> <ul style="list-style-type: none"> - On 20 December 2018 request information from Karang Taruna Kresna Sakti concerning application for funding aid for youth activities, it has responded on 12 December 2018. - On 26 February 2019 request information from BLHD Tanjung Jabung Regency, concerning giving of liquid waste sample, it has been responded on 26 February 2019 | Comply |

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| | | <ul style="list-style-type: none"> - On 1 April 2019 request information from Dinas Energi dan Sumber Daya Mineral Tanjung Jabung Regency concerning “Laporan Penggunaan Air Bawah Tanah Period March 2019, it has been responded on 2 April 2019. <p>Smallholder: The stakeholders register which recorded all stakeholders and recorded on “Daftar Nama Stakeholder Plasma Tungkal Ulu Tahun 2019”, up to date on March 2019 comprises 37 stakeholder, such as kepala desa, Dinas kopeasi & UMKM, Polsek Merlung, etc. This document was available to each KUD. Group manager has helped each KUD to develop a list of stakeholders. The list of stakeholder in KUDs has documented “Name List of KUD Stakeholder” and always updated, such as in List of Stakeholders in June 2017 are indentified 30 stakeholder, e.g: Kepala Desa Bukit Harapan, BRI Unit Merlung, LSM Lembaga Pembantu Perlindungan Tenaga Kerja, PUSKUD Jambi, Dinas Perkebunan Kabupaten Tanjung Jabung Barat, etc. Record of communication is documented in “Buku Permintaan Informasi External”. Up to April 2019 was recoed as many 10 request for information from stakeholder, such as:</p> <ul style="list-style-type: none"> - On 18 March 2019, request information from CSV related to permits provided for programs related to AA and and IDH it has been responded on 18 March 2019. - On 6 November 2018, requesting information from the Cooperative on SP1, SP2, SP3 related to TUS warehouse construction permit, it has been responded on 7 November 2018 - On 25 January 2019, requesting information from SP1 (KUD Bina Usaha) related to the replanting plan for 2021, it has been responded on 27 January 2019. - On 7 January 2019, request information from J. Sihombing (Head of KUD Argo Makmur) related the diciplin/order queue of FFB trucks at the Tungkal Ulu Mill, has been responded to on 15 January 2019. | |
| <p>Criterion 6.3 There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.</p> | | | |
| 6.3.1 | The mechanism, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers, where | <p>Mill and Estate: The Certificate holder has a handling complaint mechanism to response complaint from external party, as written in “Mekanisme Penanganan Keluhan” (No.SOP-AA-GL-5005-R0 01). For internal complaint the applicable procedure is “Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan” – Employee’ complaint and resolution mechanism (No.SOP-AAHR-3008-R0 05). Also to</p> | Comply |

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| | <p>requested, as long as that information is supported with adequate initial evidence.</p> <p>- Major compliance -</p> | <p>protect whistle blower and anonymity, it is covered within "<i>Mekanisme Jaminan Pelapor dan Pengungkapan Kasus</i>" prepared by Public Relation officer PT Inti indosawit Subur on 01/12/2015.</p> <p>These mechanisms has communicated to external parties and disseminated to all employees on January 2019. Based on interview with local communities, gender committee leader and worker union leader; they understood the procedure and mechanism to communicating complaint and/or grievance to company.</p> <p>Smallholder: All Smallholder has a flowchart process to resolve mechanism and installed in KUD office. Based on interview with Smallholder on sample plots, if the farmer has a complaint, it can be communicated through Farmer Group (KT: Ketua Kelompok Tani) and Foreman (Mandor), then it will be delivered to cooperative or KUD to respond to.</p> | |
| <p>6.3.2</p> | <p>There shall be records of process and outcome of dispute resolution.</p> <p>- Major compliance -</p> | <p>Mill and Estate: Records for complaint and grievance from internal stakeholders (workers) are documented in logbook "<i>Monitoring Keluhan Karyawan</i>". While for Smallholder, mechanism to record complaint and grievance are facilitated through "<i>Mekanisme Komunikasi, Konsultasi dan Keluhan</i>".</p> <p>There were several grievance form employees mostly concerning damge of housing, up to April 2019 there were 33 grivance related damage of housing, e.g:</p> <ul style="list-style-type: none"> - Dated 15 February 2019, grievance from Liswanto concerning leaky of badroom and kitchen roof, has been responded and fixed on 16 February 2019. - Dated 20 February 2019, grievance from Nanag S. concerning damage to the front room door and has been fixed on 24 February 2019. - Dated 4 March 2019, grievance from Nofrijon concerning damage to badroom door and has been fixed on 24 march 2019. <p>Smallholder: During interview with sample workers in Estate and Mill, worker union and sample of Smallholder in KUD Harapan Jaya, KUD Bina Usaha, KUD Argo Makmur and Koperasi Manunggal Jaya, there is no significant grievance or complaint.</p> | <p>Comply</p> |

| Criterion 6.4 | | | |
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| Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions. | | | |
| 6.4.1 | <p>A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be available, referring to decision of the Constitution Court.</p> <p>- Major compliance –</p> | <p>PT Inti Indosawit Subur – Tungkal Ulu has procedure for identifying legal, customary or user rights. Its covered within SOP AA-GL-5003.R1 related Land dispute resolution. Due to the certificate holder (company) has land use rights "HGU" for its area. FPIC process has completed prior to obtained land use title in 1992. All the certified area was clear and clean.</p> <p>Smallholder: Land ownership status of smallholder scheme is granted by government program namely Transmigration Program since 1992 – 1995. There is no compensation made since the farmers granted the certificate. In Tungkal Ulu Estate, Mill and Smallholder, there were no traditional use or customary right within the certified area.</p> | Comply |
| 6.4.2 | <p>A procedure for calculating and distributing fair compensation shall be established, implemented, monitored and evaluated in a participatory way. Corrective actions are taken as a result of this evaluation.</p> <p>- Minor compliance –</p> | <p>PT Inti Indosawit Subur – Tungkal Ulu has procedure for identifying legal, customary or user rights. Its covered within SOP AA-GL-5003.R1 related Land dispute resolution. Due to the certificate holder (company) has land use rights "HGU" for its area. FPIC process has completed prior to obtained land use title in 1992. All the certified area was clear and clean.</p> <p>Smallholder: Land ownership status of smallholder scheme is granted by government program namely Transmigration Program since 1992 – 1995. There is no compensation made since the farmers granted the certificate. In Tungkal Ulu Estate, Mill and Smallholder, there were no traditional use or customary right within the certified area.</p> | Comply |
| 6.4.3 | <p>Compensation claims, process and outcome of any negotiated agreements shall be documented, with evidence of the participation of affected parties.</p> <p>- Major compliance –</p> | <p>PT Inti Indosawit Subur – Tungkal Ulu has procedure for identifying legal, customary or user rights. Its covered within SOP AA-GL-5003.R1 related Land dispute resolution. Due to the certificate holder (company) has land use rights "HGU" for its area. FPIC process has completed prior to obtained land use title in 1992. All the certified area was clear and clean.</p> <p>Smallholder: Land ownership status of smallholder scheme is granted by government program namely Transmigration Program since 1992 – 1995. There is no compensation made since the farmers</p> | Comply |

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| | | granted the certificate. In Tungkal Ulu Estate, Mill and Smallholder, there were no traditional use or customary right within the certified area. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Criterion 6.5 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Pay and conditions for employees and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 6.5.1 | Documentation of pay and conditions for employees based on the existing manpower regulations shall be available. - Major compliance - | <p>Mill and Estate: PT Inti Indosawit Subur Tungkal Ulu determines minimum wages based on the Government regulation every year. The minimum wages in 2018 as regulated in "Surat Decree of Governor of Jambi no. 1270/KEP.GUB/DISSOSNAKERTRANS-3.3/2018, dated 7 December 2018 set at Rp 2,463,353.71,-/month concerning "Penetapan Upah Minimum Kabupaten/Kota di Provinsi Jambi Tahun 2019". PT Inti Indosawit Subur Tungkal Ulu has followed the minimum wage regulation issued by the Regency each year as outlined in the Memorandum Head HR of PT IIS No. 013/HR-AAS/MEMO/05/18, dated 2 May 2019, concerning the Increase of Worker's Wages 2019, including</p> <ul style="list-style-type: none"> - PHL Group Worker (daily worker) Wage of Rp 98,534 per day - Increase in the wage of Workers of the SKUH Group Increase from Rp 2,265,000 to Rp 2,463,354 per month or increase of Rp 198,354, - Increase in Workers Wage SKUB: wage increase of Rp 198,354 per month, increase based on appraisal in accordance with the prevailing wage table and assessment increase is not applicable for the position that has reached the highest class. <p>Basic Salary above was excluded rice allowance: 15 kg/employees, wife 9 kg, children 7.5 kg/each for 3 children (rice price; Rp. 8.350/kg in April 2019). Sample taken as below:</p> <p>Tungkal Ulu Estate:</p> <table border="0" style="width: 100%;"> <tr> <td colspan="3"><i>Slip gaji Periode April 2019</i></td> <td colspan="3"><i>Slip gaji Periode April 2019</i></td> </tr> <tr> <td colspan="3">Name: Nangsi Simbolon (BHL): 18 HK</td> <td colspan="3">Name: Sutrasno: - SKUH: 23 HK</td> </tr> <tr> <td>Basic salary</td> <td>Rp</td> <td>1.773.630</td> <td>Gaji Pokok</td> <td>Rp</td> <td>1.736.500</td> </tr> <tr> <td>Premi</td> <td>Rp</td> <td>107.118</td> <td>Fring Benefit</td> <td>Rp</td> <td>528.500</td> </tr> <tr> <td>BPJS Tek</td> <td></td> <td></td> <td>Premi</td> <td>Rp</td> <td>1.142.550</td> </tr> <tr> <td>BPJS Kes</td> <td></td> <td></td> <td>BPJS Tek</td> <td></td> <td></td> </tr> <tr> <td>Sub Total</td> <td>Rp</td> <td>1.880.748</td> <td>BPJS Kes</td> <td></td> <td></td> </tr> <tr> <td>Deduction</td> <td></td> <td></td> <td>Sub Total</td> <td>Rp</td> <td>3.407.550</td> </tr> </table> | <i>Slip gaji Periode April 2019</i> | | | <i>Slip gaji Periode April 2019</i> | | | Name: Nangsi Simbolon (BHL): 18 HK | | | Name: Sutrasno: - SKUH: 23 HK | | | Basic salary | Rp | 1.773.630 | Gaji Pokok | Rp | 1.736.500 | Premi | Rp | 107.118 | Fring Benefit | Rp | 528.500 | BPJS Tek | | | Premi | Rp | 1.142.550 | BPJS Kes | | | BPJS Tek | | | Sub Total | Rp | 1.880.748 | BPJS Kes | | | Deduction | | | Sub Total | Rp | 3.407.550 | Comply |
| <i>Slip gaji Periode April 2019</i> | | | <i>Slip gaji Periode April 2019</i> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Name: Nangsi Simbolon (BHL): 18 HK | | | Name: Sutrasno: - SKUH: 23 HK | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Basic salary | Rp | 1.773.630 | Gaji Pokok | Rp | 1.736.500 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Premi | Rp | 107.118 | Fring Benefit | Rp | 528.500 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| BPJS Tek | | | Premi | Rp | 1.142.550 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| BPJS Kes | | | BPJS Tek | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Sub Total | Rp | 1.880.748 | BPJS Kes | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Deduction | | | Sub Total | Rp | 3.407.550 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

RSPO Public Summary Report
Revision 8 (Mar /2019)

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|---|--|------------------|----|-----------|---------------|----|---------|-----------|----|--------|--------------|----|-------|--------------------------|-----------|------------------|------------------|-----------|---------------|----------------------|-----------|------------------|---|------------------|--------|----------|-------|--------|--------------------------|---------|---------|------------------|-----------|----------------|----------------------|--------------------------|------------------|--|------------------|-----------|----------------|----------------------|-----------|------------------|-----------|----|-----------|--------------|----|-------|------------------|-----------|------------------|------|--|--|-------|--|--|---------|----|--------|----------|----|--------|--------------------------|--|--|------------------|-----------|---------------|----------------------|-----------|------------------|--|
| | <table border="1"> <tr><td>BKAI</td><td></td><td></td></tr> <tr><td>POGSI</td><td></td><td></td></tr> <tr><td>BJS Tek</td><td>Rp</td><td>49.267</td></tr> <tr><td>BPJS Kes</td><td>-</td><td></td></tr> <tr><td>Jaminan Pensiun Koperasi</td><td></td><td></td></tr> <tr><td>Sub Total</td><td>Rp</td><td>49.267</td></tr> <tr><td>Take home pay</td><td>Rp</td><td>1.831.481</td></tr> </table> | BKAI | | | POGSI | | | BJS Tek | Rp | 49.267 | BPJS Kes | - | | Jaminan Pensiun Koperasi | | | Sub Total | Rp | 49.267 | Take home pay | Rp | 1.831.481 | <table border="1"> <tr><td>Deduction</td><td></td><td></td></tr> <tr><td>POGSI</td><td></td><td></td></tr> <tr><td>BJS Tek</td><td>Rp</td><td>50.414</td></tr> <tr><td>BPJS Kes</td><td>Rp</td><td>147.228</td></tr> <tr><td>Jaminan Pensiun Koperasi</td><td></td><td></td></tr> <tr><td>Sub Total</td><td>Rp</td><td>197.642</td></tr> <tr><td>Take home pay</td><td>Rp</td><td>3.209.908</td></tr> </table> | Deduction | | | POGSI | | | BJS Tek | Rp | 50.414 | BPJS Kes | Rp | 147.228 | Jaminan Pensiun Koperasi | | | Sub Total | Rp | 197.642 | Take home pay | Rp | 3.209.908 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| BKAI | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| POGSI | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| BJS Tek | Rp | 49.267 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| BPJS Kes | - | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Jaminan Pensiun Koperasi | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Sub Total | Rp | 49.267 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Take home pay | Rp | 1.831.481 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Deduction | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| POGSI | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| BJS Tek | Rp | 50.414 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| BPJS Kes | Rp | 147.228 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Jaminan Pensiun Koperasi | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Sub Total | Rp | 197.642 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Take home pay | Rp | 3.209.908 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | <p>Tungkal Ulu Mill: <i>Slip gaji Periode March 2019</i> Name: Iskandar (SKUH) : 22 Hk</p> <table border="1"> <tr><td>Basic Salary</td><td>Rp</td><td>1.661.000</td></tr> <tr><td>Fring Benefit</td><td>Rp</td><td>679.500</td></tr> <tr><td>Over Time</td><td>Rp</td><td>45.162</td></tr> <tr><td>Premi Giling</td><td>Rp</td><td>5.113</td></tr> <tr><td>Sub Total</td><td>Rp</td><td>2.390.775</td></tr> </table> <p>Deduction</p> <table border="1"> <tr><td>BKAI</td><td></td><td></td></tr> <tr><td>POGSI</td><td></td><td></td></tr> <tr><td>BJS Tek</td><td>Rp</td><td>48.120</td></tr> <tr><td>BPJS Kes</td><td>Rp</td><td>23.820</td></tr> <tr><td>Jaminan Pensiun Koperasi</td><td>Rp</td><td>134.662</td></tr> <tr><td>Sub Total</td><td>Rp</td><td>206.602</td></tr> <tr><td>Take home pay</td><td>Rp</td><td>2.184.173</td></tr> </table> | Basic Salary | Rp | 1.661.000 | Fring Benefit | Rp | 679.500 | Over Time | Rp | 45.162 | Premi Giling | Rp | 5.113 | Sub Total | Rp | 2.390.775 | BKAI | | | POGSI | | | BJS Tek | Rp | 48.120 | BPJS Kes | Rp | 23.820 | Jaminan Pensiun Koperasi | Rp | 134.662 | Sub Total | Rp | 206.602 | Take home pay | Rp | 2.184.173 | <p><i>Slip gaji Periode March 2019</i> Name: Rogianto (PHL): 25 Hk</p> <table border="1"> <tr><td>Basic Salary</td><td>Rp</td><td>2.463.375</td></tr> <tr><td>Beras</td><td></td><td></td></tr> <tr><td>Over Time</td><td>Rp</td><td>1.787.013</td></tr> <tr><td>Premi Giling</td><td>Rp</td><td>5.880</td></tr> <tr><td>Sub Total</td><td>Rp</td><td>4.256.268</td></tr> </table> <p>Deduction</p> <table border="1"> <tr><td>BKAI</td><td></td><td></td></tr> <tr><td>POGSI</td><td></td><td></td></tr> <tr><td>BJS Tek</td><td>Rp</td><td>49.268</td></tr> <tr><td>BPJS Kes</td><td>Rp</td><td>24.634</td></tr> <tr><td>Jaminan Pensiun Koperasi</td><td></td><td></td></tr> <tr><td>Sub Total</td><td>Rp</td><td>73.902</td></tr> <tr><td>Take home pay</td><td>Rp</td><td>4.182.366</td></tr> </table> | Basic Salary | Rp | 2.463.375 | Beras | | | Over Time | Rp | 1.787.013 | Premi Giling | Rp | 5.880 | Sub Total | Rp | 4.256.268 | BKAI | | | POGSI | | | BJS Tek | Rp | 49.268 | BPJS Kes | Rp | 24.634 | Jaminan Pensiun Koperasi | | | Sub Total | Rp | 73.902 | Take home pay | Rp | 4.182.366 | |
| Basic Salary | Rp | 1.661.000 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Fring Benefit | Rp | 679.500 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Over Time | Rp | 45.162 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Premi Giling | Rp | 5.113 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Sub Total | Rp | 2.390.775 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| BKAI | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| POGSI | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| BJS Tek | Rp | 48.120 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| BPJS Kes | Rp | 23.820 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Jaminan Pensiun Koperasi | Rp | 134.662 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Sub Total | Rp | 206.602 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Take home pay | Rp | 2.184.173 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Basic Salary | Rp | 2.463.375 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Beras | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Over Time | Rp | 1.787.013 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Premi Giling | Rp | 5.880 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Sub Total | Rp | 4.256.268 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| BKAI | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| POGSI | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| BJS Tek | Rp | 49.268 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| BPJS Kes | Rp | 24.634 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Jaminan Pensiun Koperasi | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Sub Total | Rp | 73.902 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Take home pay | Rp | 4.182.366 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>Implementation of payment for employees (SKUH) is not appropriate with the existing worker regulations - Decree of Governor of Jambi no. 1770/KEP.GUB/ DISSOSNAKERTRANS-3.3/2018, dated 7 December 2018 set at Rp 2,463,353.71 per month or Rp 98,535 per day.</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| | | <p>Objective evidence: Based on verification of payroll data for March 2019, there was incompatibility with regulation of basic wages SKUH employees. Basic salary for PHL employees is Rp. 98,535, - which was applied in January 2019 in accordance with the regulation (Decree of Governor of Jambi no. 1770/KEP.GUB/DISSOSNAKERTRANS-3.3/2018) while the basic wage for SKUH employees is Rp. 75,500, - (still using basic wages for the 2018 period). For example: Name: Nangsi S. (PHL Tungkal Ulu Estate) working for 18 days Basic salary: Rp 1,773,630 (18 x 98,535) Name: Sutrasno (SKUH Tungkal Ulu Estate) working for 23 days Basic salary: Rp 1,736,500 (23 x 75,500)</p> <p>Smallholder Individual member refers to memorandum from group manager and cooperatives/KUD to determines minimum wages based on the Government regulation every year, the minimum wages in 2017 as regulated in 1270/KEP.GUB/DISSOSNAKERTRANS-3.3/2018, dated 7 December 2018 concerning "Penetapan Upah Minimum Kabupaten/Kota di Provinsi Jambi Tahun 2019". Not applicable as all of the workers are considered as casual workers. They were paid based on daily rate and only pay when they have work. However, individual members tries to adjust the worker payment, referring to the government regulation. Record of payment through simple receipt.</p> | |
| 6.5.2 | <p>Collective Labor Agreement/Company Regulation, in accordance with the manpower regulations, shall be available in understandable language; and explained by the management or Labor Union to the workers.</p> <p>- Major compliance -</p> | <p>Mill and Estate: Collective Worker Agreement (PKB) between company and labour union is referred in working regulation, Worker Agreement was registered by Dirjen Pembinaan Hubungan Industrial dan Jaminan Sosial Tenaga Kerja No. Kep.88/PHIJSK-PKKAD/PKB/VI/2015, dated 18th June 2015 (Valid 21st April 2015 - 20th April 2017) Based on document review, it was noted that in terms and condition, such as: working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc, are covered in PKB and contracts which have been signed by labor union.</p> | Comply |

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| | | <p>Based on latter from BKS PPS (Badan Kerja Sama Perusahaan Perkebunan Sumatera) no. 72/BKSPPS/2017, on 12 July 2017 concerning validation of PKB, describe that: discusses about PKB period 2017-2019 is still on discuses. Based on Collective Labor agreement (PKB), Chapter XXIV regarding Valid and Expiry of Collective Labor Agreement, article 3 mentioned that "If at the end of this PKB validity a new PKB has not yet been determined, then this PKB will continue to be valid until the new PKB comes into force".</p> <p>All employees also has signed contract with detail term and condition, included temporary workers e.g.</p> <ul style="list-style-type: none"> - Surat Perjanjian Kerja Waktu tertentu, no. 007/IIS/KMB/SPK-WT/01/2019, dated 2 January 2019 namely Ade Saputra valid until 31 December 2019. - Surat Perjanjian Kerja Waktu tertentu, no. 022/IIS/KMB/SPK-WT/01/2019, dated 2 January 2019 namely Yopi Afrianto valid until 31 December 2019. - Perjanjian Kerja Untuk Jangka Waktu Tertentu, no. 017/HRD-RO3/SPK/I/2019, dated 2 January 2019 namely Deni Gusti Yanda "Petugas Sortasi", valid until 31 December 2019. - Surat Perjanjian Kerja Harian Lepas, no. 001/SPKHL/KLT/IIS/01/2019 dated 1 January 2019 namely Muhammad Arif as Harvest Sortation, valid until 31 December 2019. <p>Smallholder:</p> <ul style="list-style-type: none"> - Surat Perjanjian Kerja Karyawan KUD Bina Usaha, no. 03/SPK/BN/III/2017 dated 12 Maret 2012 namely Susi Purwati as permanent worker at position Administration Officer. - Surat Perjanjian Kerja Karyawan KUD Argi Makmur, no. 0II/SPK/AM/VIII/2017 dated 15 Agustus 2017 namely Sisi Gustia Elin as permanent worker at position Transportation Officer. - Surat Perjanjian Kerja Karyawan Koperasi Manunggal Jaya, no. 0II/SPK/KM/VIII/ 2018 dated 1 Agustus 2018 namely Aan Priyanto as permanent worker at position Transportation Officer. - Surat Perjanjian Kerja Karyawan KUD Harapan Jaya, no. 0II/SPK/HJ/VIII/2018 dated 15 August 2018 namely Sahrul Hadi as permanent worker at position Security. | |
| 6.5.3 | Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or | <p>Mill and Estate:</p> <p>Sighted in field visit and mill housing complex that adequate facilities has been available for mill workers, including: housing for staff, housing for workers (permanent and temporary), electricity from mill grid, clean water supply from water treatment plant (available for entire year), medical</p> | Comply |

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| | <p>above, where such public facilities are unavailable or inaccessible.</p> <p>- Minor compliance –</p> | <p>service in company’s clinic, primary level education facility, religion and worhsipment facility, and sport.</p> <p>Tungkal Ulu Mill Type Quantity (unit) – Housing B/CM (2 units) – Housing C (5 units) – Housing E (61 units) – Pompa air (1 units) – Waduk air (2 units)</p> <p>Tungkal Ulu Estate Type Quantity (unit) – Housing; Staff (20 units), type D1(28 units), Type E1 (1187 units), – Kindergarten (1 unit), – Clinic (2 units), – Mosque (3 units), – Church (1 units), – School bus (4 units), – Ambulance (1 unit), – Minimarket which managed by company cooperative (1 units), – Community hall (1 units), – Sport facilities (football, volley ball, tennis, badminton,</p> <p>Revealed from interview with sample 10 workers from grading station, water treatment plant, engineer room, boiler, as well as mill emplasment resident, that so far no serious complaint regarding provision of basic facility by company. School bus has been added. The company has also facilitated its employees for water supply by building pump wells in each emplacement and electricity with the distribution of PLN (and its payments are subsidized by the company, for each house Rp 40,000 per month). The company always performs maintenance and upgrading for employee housing, for example:</p> | |
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| | | <ul style="list-style-type: none"> - Application Form for Repair Housing on behalf of Sunaryadi (Employee of Workshop / traction) dated 29/6/2018 and repairs made on 30/6/2018. - Letter of appeal for housing on 31/5/2018 on behalf of Eric Simamora (Pest Control / Plant Disease) for leaking roof damage and broken room door, has been repaired on 1/6/2018 <p>Smallholder: Not applicable as all of the workers are considered as casual workers. They were staying at their own houses.</p> | |
| 6.5.4 | <p>There shall be demonstrable efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance –</p> | <p>Mill and Estate: Certificate holder has minimarket which managed by the cooperative (Koperasi Jaya Abadi) and traditional market is nearby surrounding company area, mostly goods needed by employees is provided by the cooperative Jaya Abadi. Price in cooperative Jaya Abadi was affordable and cheaper than traditional market nearby company area. Price control by cooperative and all member including workers and company management.</p> <p>Smallholder: Not applicable as all of the workers are considered as casual workers. They are stay at their own houses and obtain their food themselves.</p> | Comply |
| <p>Criterion 6.6</p> <p>The employer respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p> | | | |
| 6.6.1 | <p>A record of the company's policy in understandable language recognising freedom of association, shall be available.</p> <p>- Major compliance –</p> | <p>Mill, Estate and Smallholder: Freedom of association policy was written in Bahasa Indonesia, therefore all employees can understand as stated in Company Policy, dated 1 December 2014, "Menghormati hak setiap karyawan untuk membentuk atau menjadi serikat pekerja sesuai dengan keinginannya dan untuk melakukan tawar menawar secara kolektif". It stated that the company respect the right of each employee to form or be a union according to their wishes and to bargain collectively</p> | Comply |

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| | | <p>This policy has been informed to all employees and being placed into notice board in public area and easily accessed. The company also has made refreshment socialization regarding the company policy to all employees on January 2018.</p> <p>Tungkal Ulu Estate and POM have a Worker Union as a form of freedom of association for employees named Serikat Buruh Sejahtera Indonesia (SBSI), base on decree of Koordinator Wilayah Provinsi Jambi Serikat Buruh Sejahtera Indonesia, no. K6.95/SK/ KORWIL.SBSI/JAMBI/II/2017 dated 10 January 2017 concerning Pengurus Komisariat Serikat Buruh Sejahtera Indonesia PT IIS Tungkal Ulu Kab. Tanjung Jabung Barat decided Mr. S. Sitorus as chairperson of SBSI period 2017-2019 with total number of registered members as many as 204 people.</p> <p>The SBSI Workers Union Tungkal Ulu has registered at the office of the Manpower Office of Kab. Tanjung Jabung Baart based on Recording Proof of Record from Disnakertrans Kab. Tanjung Jabung Barat no. 560/846 / 4.1 / DSTKT / VII / 2015 chaired by Mr. S. Sitorus</p> | |
| 6.6.2 | <p>Records of meetings with labor unions or workers representatives shall be available.</p> <p>- Minor compliance –</p> | <p>Mill, Estate and Smallholder: Record of meeting of SBSI/(Labor Union), such as:</p> <ol style="list-style-type: none"> 1) January 27, 2019, discussion regarding the making of the SBSI work program in 2019, attended by 23 participants. 2) March 10, 2019, discussion regarding Making SBSI work program in 2019, attended by 20 participants 2) April 25, 2018, discussion related: <ul style="list-style-type: none"> • PLN (electricity) subsidies provided by the company to employees of Rp. 40,000 per month are not sufficient for a month. The company will re-coordinate with leaders (Regional Head-Jambi) • Delay of procurement-PP shoes for traction workshop employees. There was missed communication: the previous warehouse officer (krani) with the new one that the PP safety shoes have been carried out with no. PP KTU1800168 in May 2018 • It is necessary to arrange a vehicle for garbage collection in the employee housing area, a vehicle has been arranged to transport waste in the residential environment, namely DT.09 and DT.13 <p>SBSI Tungkal Ulu has set work program on 2019, such as:</p> | Comply |

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| | | <ul style="list-style-type: none"> - One month meeting which is an internal board meeting. - Holding a Bipartite meeting between unions (SBSI) and company leaders 2 times a year. - Hold monthly SBSI member meetings - Conducting counseling and dissemination to all members of SBSI regarding District Minimum Wage in 2018 <p>SPSI has also established a work program that is recorded in the Work Program PUK SPSI PT Inti Indosawit Subur Group Kebun Tungkal Ulu Year 2018.</p> | |
| <p>Criterion 6.7 Children are not employed or exploited.</p> | | | |
| 6.7.1 | <p>There shall be documented evidence that minimum age requirements are met.</p> <p>- Major compliance –</p> | <p>Mill and Estate: PT Inti Indosawit Subur – Tungkal Ulu has established Company Policy under “Kebijakan Perusahaan”, was signed by Managing Director on 1st December 2014, in point 14 mentioned: It is not allowed all children to work in every activities in company”.</p> <p>Based on document review of workers list “Daftar Karyawan – April 2019”, there was no underage workers. PT Inti Indosawit Subur – Tungkal Ulu complies with regulation of minimum age has been determined 18 years. The youngest employee is 18 years old namely Mr. Roki Putra C. M. date of birth on 21 Marh 2000 and joint with company on 17 September 2018.</p> <p>Data verified: Graphic of presentation of workers age dissemination year 2019 on Tungkal Ulu Estate consisting of: 18-25 years old are 122 workers (12%), 26-35 years old are 348 workers (35%), 36-45 years old are 389 workers (39%), >45 years old are 143 workers (14%). Total employee in Tugkal Estate 1002 workers.</p> <p>Smallholder: (KUD Harapan Jaya, KUD Manunggal Jaya, KUD Bina Usaha and KUD Argo Makmur). Based on interview with in Smallholder Head of KUD Harapan Jaya, KUD Manunggal Jaya, KUD Bina Usaha and KUD Argo Makmur, there were found that a minimum age are met (the youngest of harvester born year 1996 – based on ID verification).</p> | Comply |

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| | | Document seen: data sources from harvester and manuring workers on KUD Bina Usaha, in Hampan 17, 29, 33, 35, 24, 25, 18, 20. | |
| Criterion 6.8 | | | |
| Any form of discrimination based on race, caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation, or age, is prohibited. | | | |
| 6.8.1 | <p>A company's policy on equal opportunity and treatment for work shall be available and documented.</p> <p>- Major compliance –</p> | <p>Mill and Estate: PT Inti Indosawit Subur – Tungkal Ulu has established Company Policy under "Kebijakan Perusahaan", was signed by Managing Director on 1 December 2014. In point 13 mentioned: "Company treats employees fairly, whether in terms of acceptance, judgment, conditions and work environment, and representation irrespective of race, tribe, caste, national origin, religion/faith, disability, gender, sexual orientation, union membership, political affiliation and/or age". This policy has been informed to all employees and being placed into noticed board in in office.</p> <p>PT Inti Indosawit Subur also has shown the on SOP CR. 01.01 about "Penerimaan Karyawan Baru" (Reqrutment and Selection of Employee), the company will accept new employee based on their capabilities and qualifications.</p> <p>Smallholder: (KUD Harapan Jaya, KUD Manunggal Jaya, KUD Bina Usaha and KUD Argo Makmur). The cooperative has established the policy related to equal opportunity and Head of Cooperative signed treatment for work under "Kebijakan Koperasi", e.g in KUD Manunggal Jaya which mentions KUD "Respect for human rights by treating all employees fairly, regardless of race, caste, national origin, religion/belief, disability, gender, sexual orientation, political affiliation or age.</p> <p>Sampled individual members explained the implementation through hiring casual workers from different province in Indonesia.</p> | Comply |
| 6.8.2 | <p>Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated.</p> <p>- Major compliance –</p> | <p>Mill and Estate: PT Inti Indosawit Subur – Tungkal Ulu has a policy in relation to this indicator requirement, stated in "Kebijakan Perusahaan", dated 1st December 2014. Based on interview with employee in POM and Estate, there is no issue has found with regards to discrimination against local communities, women, and migrant workers. Data seen:</p> | Comply |

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| | | <ul style="list-style-type: none"> - List of Employee year 2018 "Daftar Karyawan Period April 2019" there were not found any evidence of discrimination and migrant workers - Employee graphic of presentation has shown, total employee is 1002 workers consist of 631 male workers (63%) and 371 female workers (37%) <p>Smallholder: Scheme Smallholder (KUD Sawit Kita, KUD Karya Kita, KUD Panca Mukti and KUD Sari Bumi) Cooperative has clearly stated the policy to provide equal opportunity policy to all worker as written in "Kebijakan Koperasi". During field audit, it was not found discrimination against gender, tribe, religion and race. All worker has the right and obligation in accordance to the type of work.</p> | |
| 6.8.3 | <p>Records of evidence that equal opportunity and treatment for work shall be available.</p> <p>- Minor compliance -</p> | <p>Mill and Estate: PT Inti Indosawit Subur – Tungkal Ulu have procedure for hiring workers regulated that hiring and promotion of workers based on skill, work experiences, and job evaluation. This fair treatment also mentioned in Company Regulation and company policy.</p> <p>Based on interview with workers, both of male and female were confirmed that there was no discrimination on working opportunities, all workers were treated equally and has same opportunity. Records of employee's recruitment and its contract agreement were available.</p> <p>Data verified:</p> <ul style="list-style-type: none"> - Employee graphic of presentation of ethnic dissemination year 2018, consisting of: Javanese (41%), Malayan (39%), Minangkabau (2%), Batak (10%), Tapanuli (3%), Lombok (1%), Sundanese (2%), Flores (1%) and Nias (1%). - Employee's evaluation was conducted each year to decided promotion of employees. PT Inti Indosawit Subur – Tungkal Ulu has performed evaluation of workers annually as documented in "Rekapitulasi Appraisal PB 2018, with scoring for work quality, work quantity, behavior/attitude, team work, discipline, responsibility. <p>The company has a program to appoint casual/daily workers (PHL) to become permanent workers (SKUH), the delivery of which has been realized is:</p> <ul style="list-style-type: none"> - Memorandum no. 080/HR-RO3/MEMO/SK/04/2019, dated 22 April 2019 concerning Promotion of casual workers to permanent workers on Tungkal Ulu Estate namely Sdri. Mela Arya Neva Belahi RS effectively from date 1 May 2019 | Comply |

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| | | <ul style="list-style-type: none"> - Memorandum no. 082/HR-RO3/MEMO/SK/04/2019, dated 22 April 2019 concerning Promotion of casual workers to permanent workers on Tungkal Ulu Estate namely Sdr. Kholid Al Fuadi Hasibuan effectively from date 1 May 2019 - Memorandum no. 108-112/HR-RO3/MEMO/SK/05/2019, dated 01 May 2019 concerning Promotion of 5 casual workers to permanent workers on Tungkal Ulu MILL effectively from date 1 May 2019; namely: M. Nuh Siregar, M. Jefri Al Idrus, Satrio Akojuono, Toni Iswara and Doni Sardi. <p>Smallholder: (KUD Harapan Jaya, KUD Manunggal Jaya, KUD Bina Usaha and KUD Argo Makmur) Recruitment process was based on procedure, whereby mentioned recruitment and promotion of workers based on worker competency.</p> | |
| <p>Criterion 6.9 There is no harassment or abuse in the work place, and reproductive rights are protected.</p> | | | |
| 6.9.1 | <p>A policy to prevent sexual and all other forms of harassment and violence, shall be documented, implemented and communicated to all levels of the workforce.</p> <p>- Major compliance –</p> | <p>Mill and Estate: A policy to protect the reproductive rights as it is found in company policy that's signed by Managing Director, dated 01st December 2014 and on one part of the policies stated that: "<i>Mencegah pelecehan seksual dan berbagai bentuk kekerasan terhadap perempuan serta melindungi hak-hak reproduksinya</i> (To prevent any sexual or physical abuses happen to women as well as to protect their reproductive rights)". There is a gender committee actively meets and discussing general agenda and other issue related to handling sexual harassment, dissemination of sexual harassment prevention. Gender committee has dissemination on 11 Marh 2019 attended by 25 participants.</p> <p>Implemented policy on prevention of sexual harassment and violence against women, the policy is prominently displayed on notice boards at the Mills and the Estates muster areas. Interviews of female staff, workers and union representatives confirmed that the company implemented the sexual harassment policy.</p> <p>Smallholder: Most of the farmers are managed their land independently. Therefore, the policy does not directly applicable to them. Organization has a policy to prevent sexual harassment and violence against women in "Kebijakan ICS Group Manager" dated 1 March 2015" which stated "Mencegah pelecehan</p> | Comply |

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| | | <p>sexual dan berbagai bentuk kekerasan terhadap perempuan serta melindungi hak hak reproduksinya" (prevent sexual harassment and violence as well as protect reproductive rights for women).</p> | |
| <p>6.9.2</p> | <p>A policy to protect the reproductive rights, shall be documented, implemented and communicated to all levels of the workforce.</p> <p>- Major compliance –</p> | <p>Mill and Estate: A policy to protect the reproductive rights as it is found in company policy that's signed by Managing Director, dated 01st December 2014 and on one part of the policies stated that: "Mencegah pelecehan seksual dan berbagai bentuk kekerasan terhadap perempuan serta melindungi hak-hak reproduksinya (To prevent any sexual or physical abuses happen to women as well as to protect their reproductive rights)". There is a gender committee actively meets and discussing general agenda and other issue related to handling sexual harassment, dissemination of sexual harassment prevention. Gender committee has dissemination on 11 March 2019 attended by 27 participants.</p> <p>There is a gender committee actively meets and discussing general agenda and other issue related to handling sexual harassment, dissemination of sexual harassment prevention. Gender committee has dissemination on 15 February 2018 attended by 21 participants.</p> <p>Based on interview with Gender Committee and some female employees, company has implemented the protection of women reproductive rights, in form of maternal leave, period leave, menstruation leave, regular pregnancy check for female sprayers and strictly prohibit pregnant and/or breastfeeding female worker applying pesticides/chemical.</p> <p>The company as regularly conducted pregnancy examination every 3 months, the latest examination was on 4 March 2019 to sprayer and manuring workers as many 63 workers, e.g: Suyatni (-), Hasanah (-), Wastiah (-), Nurlela Wati (-), etc.</p> <p>Smallholder: Most of the farmers are managed their land independently. Therefore, the policy does not directly applicable to them. Organization has policy to prevent sexual harassment and violence against women in "Kebijakan ICS Group Manager" dated 01 March 2015" which stated "Mencegah pelecehan seksual dan berbagai bentuk kekerasan terhadap perempuan serta melindungi hak hak reproduksinya" (prevent sexual harassment and violence as well as protect reproductive rights for women).</p> | <p>Comply</p> |

| 6.9.3 | <p>A specific grievance mechanism which respects anonymity of complainants where requested, and as long as they are supported with adequate information, shall be documented, implemented, and communicated to all workforce.</p> <p>- Minor compliance –</p> | <p>Mill and Estate: The company has the Standard Operating Procedure, No. SOP: XX-HR-308.5-R0; Revision: 0, dated 11/12/2009: Employees complaints: submission and settlement Mechanism for complaints management where it needs to protect its confidentiality.</p> <p>For complaint submitter, it was found in company policy’s draft as in one of points of this policies stated that: “To provide appropriate information for those who inquiry it and to proted its confidentiality for whistleblower cases in accordance to law regarding environmental and social issue, food safety, health and safety work, so that it enables them to more participate to the decision making processes for improving company’s performance”.</p> <p>Based on interview with gender committee shown that they have good understanding on complaint submission mechanism and have annual program including dissemination on female worker’s rights.</p> | Comply | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|---|--|--------------------|--------------------|-------------|--------------------|--|--|--|--|---------------------|-------------|-------------------|-------------|-----------------|-------------|--------------------|-------------|-----------------|-------------|--------------------|-------------|-----------------|-------------|--------------------|-------------|-----------------------|-------------|-------------------|-------------|-----------------|-------------|--------------------|-------------|-------------------|-------------|---------------------|-------------|-------------------|-------------|---------------------|-------------|--------|
| <p>Criterion 6.10 Growers and millers deal fairly and transparently with Smallholder and other local businesses.</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 6.10.1 | <p>Current and past prices paid for Fresh Fruit Bunches (FFB), shall be publicly available.</p> <p>- Minor compliance -</p> | <p>The company has displayed the FFB price in Mill’s notice board and FFB supplier or Smallholder able to access the FFB price by phone and local media as well.</p> <table border="1" data-bbox="757 954 1839 1382"> <thead> <tr> <th>Date/Period</th> <th>FFB price/kg (IDR)</th> <th>Date/Period</th> <th>FFB price/kg (IDR)</th> </tr> </thead> <tbody> <tr> <td colspan="4">Hasil Rapat Penetapan Harga TBS Kelapa Sawit Dinas Perkebunan Provinsi Jambi 2018-2019</td> </tr> <tr> <td>29 June-5 July 2018</td> <td>Rp.1,434.93</td> <td>4-10 January 2019</td> <td>Rp.1,193.16</td> </tr> <tr> <td>6 -12 July 2018</td> <td>Rp.1,464.83</td> <td>11-17 January 2019</td> <td>Rp.1,236.41</td> </tr> <tr> <td>13-19 July 2018</td> <td>Rp.1,457.66</td> <td>18-24 January 2019</td> <td>Rp.1,302.78</td> </tr> <tr> <td>20-26 July 2018</td> <td>Rp.1,393.69</td> <td>25-31 January 2019</td> <td>Rp.1,347.04</td> </tr> <tr> <td>27 July-2 August 2018</td> <td>Rp.1,356.46</td> <td>1-7 February 2019</td> <td>Rp.1,471.35</td> </tr> <tr> <td>3-9 August 2018</td> <td>Rp.1,343.94</td> <td>8-14 February 2019</td> <td>Rp.1,357.69</td> </tr> <tr> <td>10-16 August 2018</td> <td>Rp.1,338.34</td> <td>15-21 February 2019</td> <td>Rp.1,385.94</td> </tr> <tr> <td>17-23 August 2018</td> <td>Rp.1,359.97</td> <td>22-28 February 2019</td> <td>Rp.1,376.81</td> </tr> </tbody> </table> | Date/Period | FFB price/kg (IDR) | Date/Period | FFB price/kg (IDR) | Hasil Rapat Penetapan Harga TBS Kelapa Sawit Dinas Perkebunan Provinsi Jambi 2018-2019 | | | | 29 June-5 July 2018 | Rp.1,434.93 | 4-10 January 2019 | Rp.1,193.16 | 6 -12 July 2018 | Rp.1,464.83 | 11-17 January 2019 | Rp.1,236.41 | 13-19 July 2018 | Rp.1,457.66 | 18-24 January 2019 | Rp.1,302.78 | 20-26 July 2018 | Rp.1,393.69 | 25-31 January 2019 | Rp.1,347.04 | 27 July-2 August 2018 | Rp.1,356.46 | 1-7 February 2019 | Rp.1,471.35 | 3-9 August 2018 | Rp.1,343.94 | 8-14 February 2019 | Rp.1,357.69 | 10-16 August 2018 | Rp.1,338.34 | 15-21 February 2019 | Rp.1,385.94 | 17-23 August 2018 | Rp.1,359.97 | 22-28 February 2019 | Rp.1,376.81 | Comply |
| Date/Period | FFB price/kg (IDR) | Date/Period | FFB price/kg (IDR) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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|---|---------------------------------|---------------------------|-----------------------|---------------------------|--|
| | 24-30 August 2018 | Rp.1,363.96 | 1-7 March 2019 | Rp.1,347.88 | |
| | 31 August-6 September 2018 | Rp.1,364.83 | 8-14 March 2019 | Rp.1,292.83 | |
| | 7-13 September 2018 | Rp.1,385.92 | 15-21 March 2019 | Rp.1,327.83 | |
| | 14-20 September 2018 | Rp.1,393.13 | 22-28 March 2019 | Rp.1,328.05 | |
| | 21-27 September 2018 | Rp.1,376.64 | 29 March-4 April 2019 | Rp.1,316.80 | |
| | 28 September-4 October 2018 | Rp.1,338.47 | 5-11 April 2019 | Rp.1,306.96 | |
| | 5-11 October 2018 | Rp.1,323.83 | 12-18 April 2019 | Rp.1,315.31 | |
| | 12-18 October 2018 | Rp.1,312.41 | 19-25 April 2019 | Rp.1,319.29 | |
| | 19-25 October 2018 | Rp.1,323.60 | 26 April-2 May 2019 | Rp.1,284.92 | |
| | 26 October-1 November 2018 | Rp.1,322.32 | 3-9 May 2019 | Rp.1,257.71 | |
| | 2-8 November 2018 | Rp.1,281.51 | 10-16 May 2019 | Rp.1,231.00 | |
| | 9-15 November 2018 | Rp.1,250.33 | 17-23 May 2019 | Rp.1,209.90 | |
| | 16-22 November 2018 | Rp.1,132.76 | | | |
| | 23-29 November 2018 | Rp.1,032.16 | | | |
| | 30 November-6 December 2018 | Rp.980.94 | | | |
| | 7-13 December 2018 | Rp.1,049.08 | | | |
| | 14-20 December 2018 | Rp.1,101.04 | | | |
| | 21-27 December 2018 | Rp.1,163.50 | | | |
| | 28 December 2018-3 January 2019 | Rp.1,204.99 | | | |
| Record of FFB price for third party FFB supplier: | | | | | |
| | Date/Period | FFB price/kg (IDR) | Date/Period | FFB price/kg (IDR) | |
| | 1-4 July 2018 | Rp.1,180 | 1-3 January 2019 | Rp.1,230 | |

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Revision 8 (Mar /2019)**

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| | 5 July-1 August 2018 | Rp.1,210 | 4-7 January 2019 | Rp.1,260 | | |
| | 2-13 August 2018 | Rp.1,240 | 8-9 January 2019 | Rp.1,290 | | |
| | 14-28 August 2018 | Rp.1,270 | 10-11 January 2019 | Rp.1,320 | | |
| | 29 August-3 September 2018 | Rp.1,240 | 12-16 January 2019 | Rp.1,350 | | |
| | 4-14 September 2018 | Rp.1,210 | 17-25 January 2019 | Rp.1,380 | | |
| | 15-19 September 2018 | Rp.1,180 | 26-28 January 2019 | Rp.1,410 | | |
| | 20 September 2018 | Rp.1,150 | 29-31 January 2019 | Rp.1,440 | | |
| | 21-30 September 2018 | Rp.1,120 | 1-22 February 2019 | Rp.1,460 | | |
| | 1-8 October 2018 | Rp.1,100 | 23-26 February 2019 | Rp.1,430 | | |
| | 9 October 2018 | Rp.1,130 | 27 February-15 Mar 2019 | Rp.1,400 | | |
| | 10 October 2018 | Rp.1,160 | 16-25 March 2019 | Rp.1,370 | | |
| | 11-16 October 2018 | Rp.1,190 | 26 March-23 April 2019 | Rp.1,400 | | |
| | 17-18 October 2018 | Rp.1,170 | 24-26 April 2019 | Rp.1,370 | | |
| | 19 October-8 November 2018 | Rp.1,140 | 27-29 April 2019 | Rp.1,340 | | |
| | 9 November 2018 | Rp.1,110 | 30 April-2 May 2019 | Rp.1,310 | | |
| | 10-14 November 2018 | Rp.1,080 | 3-13 May 2019 | Rp.1,280 | | |
| | 15-30 November 2018 | Rp.1,020 | 14-19 May 2019 | Rp.1,250 | | |
| | 1-5 December 2018 | Rp.1,040 | | | | |
| | 6-7 December 2018 | Rp.1,070 | | | | |
| | 8-11 December 2018 | Rp.1,090 | | | | |
| | 12-13 December 2018 | Rp.1,120 | | | | |
| | 14-16 December 2018 | Rp.1,140 | | | | |
| | 17-19 December 2018 | Rp.1,200 | | | | |
| | 20-31 December 2018 | Rp.1,230 | | | | |

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| 6.10.2 | <p>Pricing mechanisms for Fresh Fruit Bunches (FFB) and inputs/services shall be explained and documented (where these are under the control of the mill or plantation).</p> <p>- Major compliance -</p> | <p>Pricing mechanism for scheme smallholder’s FFB purchase by PT. Inti Indosawit Subur refers to “Peraturan Menteri Pertanian No.14/Permentan/OT.140/2/2013 tentang Pedoman Penetapan Harga Pembelian Tandan Buah Segar Kelapa Sawit Produksi Pekebun”. In accordance with Agreement Letter between PT. IIS and scheme smallholder, determination of FFB price from scheme smallholder refers to price determination by local authority of Jambi Province through pricing committee (working group) “Rapat Kelompok Kerja Penetapan Harga TBS Provinsi Jambi”. The price is updated and announced regularly every week by using the following formula:</p> <p style="text-align: center;"><i>K index {(CPOprice x R-CPO) + (Kernel price x R-kernel)}</i></p> <p>In each cooperative/Koperasi Unit Desa, company have communicated these caculation titled “Mekanisme Penetapan Harga TBS Plasma”. This information have been acknowledge by smallholder member and committee of KUD Harapan Jaya, KUD Argo Makmur, KUD Karya Kita, KUD Manunggal Jaya – on March 2019.</p> <p>Pricing mechanism for third party supplier explained out in “Standard Operating Procedures Pembelian TBS Luar No.AA-MM-506.1-R3” dated 1 October 2018. The procedure lined out the roles and responsibilities of all personnel, the accounting treatment, third-party FFB price determination, supplier determination (survey and verification), third-party FFB sampling and grading and SOP on payment.</p> <p>Third-party FFB determination: FFB purchase manager will prepare FFB purchase price list from surrounding mill – then calculate FFB purchase price based on CPO and PK price minus transport cost and divided with 10% tax. This figure will then calculated against OER and KER. Further minus with processing cost. The price will be approved by Head FFB Purchase. The FFB size will determine the price.</p> <p>The mechanism for third-party FFB price determination have been communicated to 14 suppliers in 19 January 2019: Sumardi (HD), Edward (NZ), Ahmad Mantik (Makmur Mandiri), Jibus</p> | Comply |

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| | | (Pekarangan), H. Zulkifli S. (MT), Nista (PT), Pandi (YESS), Victory, Frans (KSP), H. Lukman (GUB), Sandi (GMJ), Sukarman (DK), Karmi (AJB), Mulyono (Makmur Mandiri). | |
| 6.10.3 | <p>Evidence shall be available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent.</p> <p>- Minor compliance -</p> | <p>Mill, Estate and Smallholders:</p> <p>PT Inti Indosawit Subur – Tungkal Ulu has had contract agreement with each KUD. The agreement stated “<i>Dengan ini menyatakan sesungguhnya bahwa kedua belah pihak telah mufakat untuk mengikat di bidang jual beli Tandan Buah Segar (TBS), pembinaan teknis, pemeliharaan tanaman antara Petani peserta dengan perusahaan inti PT Inti Indosawit Subur PIR Trans Jambi</i>”, mean “It is hereby declared that both parties have agreed to the terms of purchase and sale of Fresh Fruit Bunch (FFB), technical guidance, and crop upkeep between the participating farmers and the company PT Inti Indosawit Subur - PIR Trans Jambi. The agreement are available as follows:</p> <ul style="list-style-type: none"> - Letter of Cooperation Agreement of PT Inti Indosawit Subur-Tungkal Ulu with KUD Bina Usaha PIR Trans Jambi, recorded on <i>Perjanjian Produksi, Jual Beli Tandan Buah Segar (TBS), Pemeliharaan antara Petani Peserta dan PT IIS</i>, no. 03/SP/TU/8-1996 dated 20 August 1996. - Letter of Cooperation Agreement of PT Inti Indosawit Subur-Tungkal Ulu with KUD Karya Kita PIR Trans Jambi, recorded on <i>Perjanjian Produksi, Jual Beli Tandan Buah Segar (TBS), Pemeliharaan antara Petani Peserta dan PT IIS</i>, no. 01/SP/TU/8-1996 dated 20 August 1996. - Letter of Cooperation Agreement of PT Inti Indosawit Subur-Tungkal Ulu with KUD Karya Jaya PIR Trans Jambi, recorded on <i>Perjanjian Produksi, Jual Beli Tandan Buah Segar (TBS), Pemeliharaan antara Petani Peserta dan PT IIS</i>, no. 36/SP/TU/IX-1995 dated 20 August 1995. - Letter of Cooperation Agreement of PT Inti Indosawit Subur-Tungkal Ulu with KUD Panca Mukti PIR Trans Jambi recorded on <i>Perjanjian Produksi, Jual Beli Tandan Buah Segar (TBS), Pemeliharaan antara Petani Peserta dan PT IIS</i>, no. 04/SP/TU/8-1996 dated 26 August 1996. - Letter of Cooperation Agreement of PT Inti Indosawit Subur-Tungkal Ulu with KUD Sari Bumi PIR Trans Jambi, recorded on <i>Perjanjian Produksi, Jual Beli Tandan Buah Segar (TBS), Pemeliharaan antara Petani Peserta dan PT IIS</i>, no. 46/SP/TU/IX-1995 dated 20 August 1996. (Bekerja sama dengan Koperasi Manunggal Jaya) - Letter of Cooperation Agreement of PT Inti Indosawit Subur-Tungkal Ulu with KUD Sawit Mulia PIR Trans Jambi, recorded on <i>Perjanjian Produksi, Jual Beli Tandan Buah Segar (TBS), Pemeliharaan antara Petani Peserta dan PT IIS</i>, no. 02/SP/TU/8-1996 dated 20 August 1996. - Letter of Cooperation Agreement of PT Inti Indosawit Subur-Tungkal Ulu with KUD Argo Makmur PIR Trans Jambi, recorded on <i>Perjanjian Produksi, Jual Beli Tandan Buah Segar (TBS), Pemeliharaan antara Petani Peserta dan PT IIS</i>, no. 05/SP/TU/8-1996 dated 26 August 1996. | Comply |

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| | | <ul style="list-style-type: none"> - Letter of Cooperation Agreement of PT Inti Indosawit Subur-Tungkal Ulu with KUD Harapan Jaya PIR Trans Jambi, recorded on <i>Perjanjian Produksi, Jual Beli Tandan Buah Segar (TBS), Pemeliharaan antara Petani Peserta dan PT IIS</i>, no. 06/SP/TU/8-1996 dated 26 August 1996. - Letter of Cooperation Agreement of PT Inti Indosawit Subur-Tungkal Ulu with KUD Sawit Kita PIR Trans Jambi, recorded on <i>Perjanjian Produksi, Jual Beli Tandan Buah Segar (TBS), Pemeliharaan antara Petani Peserta dan PT IIS</i>, no. 01/SP/IX/TU/1994 dated 20 August 1996. <p>For third-party FFB supplier, there is no contract. Because only supply FFB to Tungkal Ulu POM, when FFB purchase price agreed.</p> <p>In KUD Bina Usaha, the agreement letter "Surat Perjanjian Kerja Angkutan No.011/KUD-BN/I/2019" dated 15 January 2019 – between KUD Bina Usaha and Mrs. Rosdiana, for the work of transporting FFB from smallholder’s plantation to Tungkal Ulu POM. The agreement valid 15 January 2019 – 14 January 2020. The agreement covers type of FFB transporter (truck) and working area coverage; field supervision; timeframe and operation; rental fee (Rp.82/kg); payment method; operators; responsibility and accountability (OHS and environment); disclaimer; force majeure condition; agreement cancellation.</p> <p>In KUD Argo Makmur, the agreement "Surat Perjanjian Kerja Angkutan No.004/KUD-AM/I/2019" dated 12 February 2019 – between KUD Argo Makmur and Mrs. Kamsinah, for the work of transporting FFB from smallholder’s plantation to Tungkal Ulu POM. The agreement valid 12 February 2019 – 11 February 2020. The agreement covers type of FFB transporter (truck) and working area coverage; field supervision; timeframe and operation; rental fee (Rp.115/kg); payment method; operators; responsibility and accountability (OHS and environment); disclaimer; force majeure condition; agreement cancellation.</p> | |
| 6.10.4 | <p>Agreed payments shall be made in a timely manner.</p> <p>- Minor compliance -</p> | <p>Mill and Estate:</p> <p>A review to several payment records January – April 2019 demonstrated that the payment has been made via bank transfer. It was appropriate with the related MOU/Agreement. The payment was also been made periodically according to the contract agreement. Sample seen: Payment for Mrs. Lisbeth Simorangkir Rp.6,719,450 on 21 May 2019 through Bank Panin – Jambi; and Payment for Mr. Tharmizi Rp.2,655,187 on 21 May 2019 through Bank Panin – Jambi.</p> | Comply |

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| | | <p>For Third-party FFB: Sampled of FFB payment for third party FFB supplier Novie Zulhi dated 9-11 May 2019: 6 deliveries with weighbridge ticket No.PTUA519204070 (nett weight 7,524 kg); No.PTUA519204095 (nett weight 5,443 kg); No.PTUA519204097 (nett weight 6,795 kg); No.PTUA519204126 (nett weight 8,704 kg); No.PTUA519204130 (nett weight 4,555 kg); No.PTUA519204146 (nett weight 8,078 kg); - total 41,099 kg. Price for period sets at Rp.1,280/kg. Total payment after tax Rp.52,475,202 – paid by Bank Panin Medan, to Novie Zulhi on 13 May 2019.</p> <p>Sampled of FFB payment for third party FFB supplier Makmur Mandiri dated 10-11 May 2019: 5 deliveries with weighbridge ticket No.PTUA519204090 (nett weight 7,133 kg); No.PTUA519204098 (nett weight 8,949 kg); No.PTUA519204099 (nett weight 7,078 kg); No.PTUA519204101 (nett weight 9,966 kg); No.PTUA519204117 (nett weight 7,257 kg) - total 40,383 kg. Price for period sets at Rp.1,280/kg. Total payment after tax Rp.51,561,014 – paid by Bank Panin Medan, to Makmur Mandiri on 13 May 2019.</p> <p>Smallholder: KUD Bina Usaha paid their FFB transporter: "Kwitansi Pembayaran Armada Angkut TBS KUD Bina Usaha", for Mrs. Rosdiana, vehicle No.BH8729AI, for work on smallholder group 4. FFB transported 40,111 kg for period ends February 2019; fee Rp.82/kg – paid Rp.3,289,020 in March 2019. FFB transported 52,391 kg for period ends March 2019; fee Rp.82/kg – paid Rp.4,295,080 in April 2019.</p> <p>KUD Argo Makmur paid their FFB transporter: "Kwitansi Pembayaran Armada Angkut TBS KUD Argo Makmur", for Mrs. Rosdiana, vehicle No.BH8068EJ and BH8506HV, for work on smallholder group 16. FFB transported 58,807 kg for period ends January 2019; fee Rp.115/kg – paid Rp.6,762,805 in February 2019. FFB transported 64,223 kg for period ends February 2019; fee Rp.115/kg – paid Rp.7,385,645 in March 2019.</p> | |
| <p>Criterion 6.11</p> | | | |
| <p>Growers and millers contribute to local sustainable development where appropriate.</p> | | | |
| <p>6.11.1</p> | <p>Records of contributions to local development based on the results of</p> | <p>Mill and Estate: Local contribution by company is detailed in CSR program base on "Lembar Persetujuan Proyek CSR Asian Agri"; consist of Business Partnership, Economy Development, Education, Health & Donation. The company has established a Community Development program – CSR period 2018 comprised of</p> | <p>Comply</p> |

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| <p>consultation with local communities shall be available.</p> <p>- Minor compliance -</p> | <p>Relationship Building/ Communication program, Capacity Building for community program, Livelihood programme, Health programme, and Public Facility/Infrastructure programme, Contribution to Religious event & Culture, Contribution to National Day, Donation and Awareness programme.</p> <p>Program plans recorded in CSR program 2019 documents, such as:</p> <ul style="list-style-type: none"> - The assistance of Lebaran package for Duafa 2019 to several villages around the plantation. - Donate major religious and national day activities - Providing assistance for Polsek Merlung office equipment - Conducting activities of the potential studies of local villages for example: Bulain Jaya, Bukit Sari, Canal, Kuranji village, etc. - Giving help of goat cattle package to the DUAFA. - Construction of sports facilities in DSN 173/V DesaTanjung Dhanakya. - Free health screening to the village surrounding the plantation, for example: Bulain Jaya, Bukit Sari, Canal, Kuranji village, etc. - Providing assistance for material construction of the mosque in Pinang Gading village. - Heavy equipment assistance for the improvement of JALN and general Fascation of Tanjung Makmur Village <p>The realization of the CSR program for the period of 2018-2019 that has been implemented, the realization of CSR program in 2018 until December 2018 reached 100%. While the CSR program in 2019 until April 2019 remain in progress to complete is about 9.5%, i.e:</p> <ul style="list-style-type: none"> - Safari Ramadhan on local villages and "Plasma Binaan" surround villages, realization on May 2019 requires funds of Rp 30,830,000. - Road/bridge repair assistance; Grading, roads and hardening using split stones realized on February 2019 requires funds of Rp 66,000,000,-. - Assitance for Polsek Tungkal Ulu office on 10 April 2019, requires funds of Rp 10,000,000. - Social assistance in the form of the construction of the Baiturrahman Grand Mosque in Pinang Gading Village on April 10, 2019, requiring funds of Rp 5,000,000. <p>Smallholder:</p> | |
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| | | Not applicable. The Plasma Tungkal Ulu group consists of all members from the local community; this criterion may not be applicable. | |
| 6.11.2 | Where there are scheme Smallholder, there shall be evidence that efforts and/or resources have been allocated to improve scheme smallholder productivity. - Minor compliance - | <p>PT Inti Indosawit Subur Tungkal Ulu has effort and resources allocated to improve scheme smallholder, Kebun Plasma Tungkal Ulu. Smallholder management are conducted by Special Department headed by Plasma Manager namely Sahala Mahulae and or Askep Mr. Ayat Khumaini and Field assistant (there are 4 Field Assistant (Mr. Syamsul Ajis, Mr. Daud Artha Rambe, MR. Edward J Sitohang, Mr. Riyan Agus Pambuko and Mr. Manukar Purba) and 1 KTU.</p> <p>Manager Plasma (The Smallholder Manager) has assist the Scheme Smallholder to improve their productivity and welfare, such as:</p> <ul style="list-style-type: none"> - On 15 April 2017: Study visit to Topaz (Bukit Sari and Tidar Kuranji Farmer Group). - On June 2017: Technical counseling of oil palm cultivation. - On May 2017: Organizational and administrative training in Kemitraan Swadaya Partnership. <p>PT Inti Indosawit Subur Tungkal Ulu also has give the regular training and coaching to smallholder (KUD, KT and smallholder member) in order to achieve the best management practises and compliance against certification requirement and regulation compliance.</p> | Comply |
| <p>Criterion 6.12 No forms of forced or trafficked labor are used.</p> | | | |
| 6.12.1 | There shall be evidence that no forms of forced or trafficked labor are used. - Major compliance - | <p>Mill and Estate: Based on interview with worker union committee and gender committee, there was no indication of forced labour and/or human trafficking. All employees have the work agreement, regulating the rights and obligation of company and employee. The work agreement including working hour and salary payment.</p> <p>Recruitment process was documented in Procedure: AA-HR-305.2-R0 dated 1st February 2009 – Recruitment and Selection stated that Staff recruitment conduct by Head Office in Jakarta. For workers in site, recruitment processes conduct by Site Management with approval from company management.</p> | Comply |

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| | | <p>Based on document verification and salary payment, shows employee have been paid in accordance to minimum wage regulation.</p> <p>Smallholder: Based on interview with sampled individual members at KUD Bina Usaha, KUD Harapan Jaya, KUD Argo Makmur and Koperasi Manunggal Jaya, they understand no forced labor or trafficked labor allowed.</p> <p>Most of the farmers are managed their land independently. All of the workers are considered as casual workers. The workers are hired based on verbal agreement related to rate per piece of work, payment system, working tool provision, etc. No work performed based on debt bond.</p> | |
| 6.12.2 | <p>It shall be demonstrated that no contract substitution has occurred.</p> <p>- Minor compliance -</p> | <p>Mill, Estate and Smallholder: Based on the result of interview with Labor Union management and document verification of "Surat Perjanjian Kerja" shown there was no indication of contract substitution occurred. All employees have work agreement, explaining the rights and obligation including scope of work.</p> <p>Sample verified:</p> <ul style="list-style-type: none"> - Surat Perjanjian Kerja Waktu tertentu, no. 007/IIS/KMB/SPK-WT/01/2019, dated 2 January 2019 namely Ade Saputra valid until 31 December 2019. - Surat Perjanjian Kerja Waktu tertentu, no. 022/IIS/KMB/SPK-WT/01/2019, dated 2 January 2019 namely Yopi Afrianto valid until 31 December 2019. - Perjanjian Kerja Untuk Jangka Waktu Tertentu, no. 017/HRD-RO3/SPK/I/2019, dated 2 January 2019 namely Deni Gusti Yanda "Petugas Sortasi", valid until 31 December 2019. - Surat Perjanjian Kerja Harian Lepas, no. 001/SPKHL/KLT/IIS/01/2019 dated 1 January 2019 namely Muhammad Arif as Harvest Sortation, valid until 31 December 2019. - Surat Perjanjian Kerja Karyawan KUD Bina Usaha, no. 03/SPK/BN/III/2017 dated 12 Maret 2012 namely Susi Purwati as permanent worker at position Administration Officer. - Surat Perjanjian Kerja Karyawan KUD Argi Makmur, no. 0II/SPK/AM/VIII/2017 dated 15 Agustus 2017 namely Sisi Gustia Elin as permanent worker at position Transportation Officer. - Surat Perjanjian Kerja Karyawan Koperasi Manunggal Jaya, no. 0II/SPK/KM/VIII/ 2018 dated 1 Agustus 2018 namely Aan Priyanto as permanent worker at position Transportation Officer. | Comply |

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| | | <ul style="list-style-type: none"> - Surat Perjanjian Kerja Karyawan KUD Harapan Jaya, no. 0II/SPK/HJ/VIII/2018 dated 15 August 2018 namely Sahrul Hadi as permanent worker at position Security. | |
| <p>6.12.3</p> | <p>Where migrant/foreign/honorary workers are employed, a special worker policy and procedures and the evidence of implementation shall be available.</p> <p>- Major compliance -</p> | <p>Mill and Estate: The agreement for temporary workers is available and signed by workers. There was no noted migrant worker.</p> <p>Sample verified:</p> <ul style="list-style-type: none"> - Surat Perjanjian Kerja Waktu tertentu, no. 007/IIS/KMB/SPK-WT/01/2019, dated 2 January 2019 namely Ade Saputra valid until 31 December 2019. - Surat Perjanjian Kerja Waktu tertentu, no. 022/IIS/KMB/SPK-WT/01/2019, dated 2 January 2019 namely Yopi Afrianto valid until 31 December 2019. - Perjanjian Kerja Untuk Jangka Waktu Tertentu, no. 017/HRD-RO3/SPK/I/2019, dated 2 January 2019 namely Deni Gusti Yanda "Petugas Sortasi", valid until 31 December 2019. - Surat Perjanjian Kerja Harian Lepas, no. 001/SPKHL/KLT/IIS/01/2019 dated 1 January 2019 namely Muhammad Arif as Harvest Sortation, valid until 31 December 2019. - Surat Perjanjian Kerja Karyawan KUD Bina Usaha, no. 03/SPK/BN/III/2017 dated 12 Maret 2012 namely Susi Purwati as permanent worker at position Administration Officer. - Surat Perjanjian Kerja Karyawan KUD Argi Makmur, no. 0II/SPK/AM/VIII/2017 dated 15 Agustus 2017 namely Sisi Gustia Elin as permanent worker at position Transportation Officer. - Surat Perjanjian Kerja Karyawan Koperasi Manunggal Jaya, no. 0II/SPK/KM/VIII/ 2018 dated 1 Agustus 2018 namely Aan Priyanto as permanent worker at position Transportation Officer. - Surat Perjanjian Kerja Karyawan KUD Harapan Jaya, no. 0II/SPK/HJ/VIII/2018 dated 15 August 2018 namely Sahrul Hadi as permanent worker at position Security. <p>Smallholder: Most of the farmers are managed their land independently. All of the workers are considered as casual workers. Based on interview with sampled individual members, they understand the policy for temporary worker. The workers are hired based on verbal agreement related to rate per piece of work, payment system and working tool provision. No work performed based on debt bond.</p> | <p>Comply</p> |
| <p>Criterion 6.13</p> | | | |

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| Growers and millers respect human rights. | | |
| 6.13.1 | <p>A policy to respect human rights shall be documented and communicated to all levels of the workforce and operations.</p> <p>- Major compliance -</p> | <p>Mill and Estate: PT Inti Indosawit Subur – Tungkal Ulu has established the Policy under “<i>Kebijakan Perusahaan</i>” was signed by Managing Director on 1st December 2014, in point 13 mentioned: “The company committed on respect for human rights by treating all employees fairly, in terms of acceptance, assessment of conditions and work environment, and representation regardless of race, caste, national origin, religion / faith, disability, gender, sexual orientation, union membership, political affiliation and or age.</p> <p>The policy has been communicated to all workers by made available for everybody through poster and pamphlet, put on information board at the office. There is no indication of violence on human right arise from interview with stakeholder local government and workers.</p> <p>Smallholder: (KUD Sawit Kita, KUD Karya Kita, KUD Panca Mukti and KUD Sari Bumi) The cooperative has established the policy related to equal opportunity and treatment for work under “<i>Kebijakan Koperasi</i>” dated 2nd December 2016, was signed by Head of Cooperative. In point 9 mentioned “respect for human rights by treating all employees of KUD and farmers equally in terms of acceptance, assessment, conditions and work environment and representation regardless of race, caste, country of origin, religion / belief, record, gender, sexual orientation, union membership workers, political affiliations and/or age”. The policy has been communicated to smallholder member and was displayed in publication board in KUD Offices.</p> |
| <p>Principle 7: Responsible development of new plantings</p> <p>Criterion 7.1 A comprehensive and participatory independent social and environmental impact assessment is undertaken prior to establishing new plantings or operations, or expanding existing ones, and the results incorporated into planning, management and operations.</p> | | |
| 7.1.1 | <p>An independent social and environmental impact assessment (SEIA), undertaken through a participatory methodology including the</p> | <p>There is no new planting within certified area of PT Inti Indosawit Subur – Tungkal Ulu Estate and Tungkal Ulu Plasma after November 2005. Currently, replanting activities still in progress. Original year of Planting for Tungkal Ulu Estate are 1990, 1991, 1993 and 2003. Wilst year of Planting for Tungkal Ulu Plasma are 1990, 1991, 1992, 1993 and 1994. This indicator is not applicable.</p> |

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| | relevant affected stakeholders, shall be documented. - Major compliance – | | |
| 7.1.2 | Appropriate management planning and operational procedures shall be developed and implemented to avoid or mitigate identified potential negative impacts. - Minor compliance - | There is no new planting within certified area of PT Inti Indosawit Subur – Tungkal Ulu Estate and Tungkal Ulu Plasma after November 2005. Currently, replanting activities still in progress. Original year of Planting for Tungkal Ulu Estate are 1990, 1991, 1993 and 2003. Wilst year of Planting for Tungkal Ulu Plasma are 1990, 1991, 1992, 1993 and 1994. This indicator is not applicable. | N/A |
| 7.1.3 | Where the development includes an outgrower scheme (<i>skema kemitraan</i>), the impacts of the scheme and the implications of the way it is managed shall be given particular attention. - Minor compliance - | There is no new planting within certified area of PT Inti Indosawit Subur – Tungkal Ulu Estate and Tungkal Ulu Plasma after November 2005. Currently, replanting activities still in progress. Original year of Planting for Tungkal Ulu Estate are 1990, 1991, 1993 and 2003. Wilst year of Planting for Tungkal Ulu Plasma are 1990, 1991, 1992, 1993 and 1994. This indicator is not applicable. | N/A |
| Criterion 7.2 | | | |
| Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations. | | | |
| 7.2.1 | Soil suitability maps or soil surveys adequate to establish the long-term suitability of land for oil palm cultivation shall be available and taken into account in plans and operations. - Major compliance – | There is no new planting within certified area of PT Inti Indosawit Subur – Tungkal Ulu Estate and Tungkal Ulu Plasma after November 2005. Currently, replanting activities still in progress. Original year of Planting for Tungkal Ulu Estate are 1990, 1991, 1993 and 2003. Wilst year of Planting for Tungkal Ulu Plasma are 1990, 1991, 1992, 1993 and 1994. This indicator is not applicable. | N/A |
| 7.2.2 | Topographic information adequate to guide the planning of drainage and irrigation systems, roads and other infrastructure shall be available. | There is no new planting within certified area of PT Inti Indosawit Subur – Tungkal Ulu Estate and Tungkal Ulu Plasma after November 2005. Currently, replanting activities still in progress. Original year of Planting for Tungkal Ulu Estate are 1990, 1991, 1993 and 2003. Wilst year of Planting for Tungkal Ulu Plasma are 1990, 1991, 1992, 1993 and 1994. This indicator is not applicable. | N/A |

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| | - Minor compliance - | | |
| Criterion 7.3 | | | |
| New plantings since November 2005 have not replaced primary forest or any area required to maintain or enhance one or more High Conservation Values. | | | |
| 7.3.1 | <p>There shall be evidence that no new plantings have replaced primary forest, or any area required to maintain or enhance one or more High Conservation Values (HCVs), since November 2005. New plantings shall be planned and managed to best ensure the HCVs identified are maintained and/or enhanced (see Criterion 5.2).</p> <p>- Major compliance –</p> | <p>There is no new planting within certified area of PT Inti Indosawit Subur – Tungkal Ulu Estate and Tungkal Ulu Plasma after November 2005. Currently, replanting activities still in progress. Original year of Planting for Tungkal Ulu Estate are 1990, 1991, 1993 and 2003. Wilst year of Planting for Tungkal Ulu Plasma are 1990, 1991, 1992, 1993 and 1994. This indicator is not applicable.</p> | N/A |
| 7.3.2 | <p>Reports of comprehensive HCV assessment, which involves stakeholder consultation and includes record of land-use change since November 2005, shall be available. This HCV assessment shall be conducted prior to any conversion or new planting.</p> <p>- Major compliance –</p> | <p>There is no new planting within certified area of PT Inti Indosawit Subur – Tungkal Ulu Estate and Tungkal Ulu Plasma after November 2005. Currently, replanting activities still in progress. Original year of Planting for Tungkal Ulu Estate are 1990, 1991, 1993 and 2003. Wilst year of Planting for Tungkal Ulu Plasma are 1990, 1991, 1992, 1993 and 1994. This indicator is not applicable.</p> | N/A |
| 7.3.3 | <p>Records of land preparation and clearing dates shall be available.</p> <p>- Minor compliance –</p> | <p>There is no new planting within certified area of PT Inti Indosawit Subur – Tungkal Ulu Estate and Tungkal Ulu Plasma after November 2005. Currently, replanting activities still in progress. Original year of Planting for Tungkal Ulu Estate are 1990, 1991, 1993 and 2003. Wilst year of Planting for Tungkal Ulu Plasma are 1990, 1991, 1992, 1993 and 1994. This indicator is not applicable.</p> | N/A |
| 7.3.4 | <p>An action plan shall be developed that describes operational actions consequent to the findings of the HCV</p> | <p>There is no new planting within certified area of PT Inti Indosawit Subur – Tungkal Ulu Estate and Tungkal Ulu Plasma after November 2005. Currently, replanting activities still in progress. Original</p> | N/A |

| | | | |
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| | assessment, and that references the grower’s relevant operational procedures. (see Criterion 5.2) - Major compliance – | year of Planting for Tungkal Ulu Estate are 1990, 1991, 1993 and 2003. Wilst year of Planting for Tungkal Ulu Plasma are 1990, 1991, 1992, 1993 and 1994. This indicator is not applicable. | |
| 7.3.5 | Evidence of consultation with the affected community shall be available in order to identify the area required by such community to fulfill its basic needs, by considering the positive and negative changes to the livelihood as a result of plantation operations. Such matters shall be included in the HCV analysis and management plan (see Criteria 5.2). - Minor compliance – | There is no new planting within certified area of PT Inti Indosawit Subur – Tungkal Ulu Estate and Tungkal Ulu Plasma after November 2005. Currently, replanting activities still in progress. Original year of Planting for Tungkal Ulu Estate are 1990, 1991, 1993 and 2003. Wilst year of Planting for Tungkal Ulu Plasma are 1990, 1991, 1992, 1993 and 1994. This indicator is not applicable. | N/A |
| Criterion 7.4 | | | |
| Extensive planting on steep terrain, and/or marginal and fragile soils, including peat, is avoided. | | | |
| 7.4.1 | Indicative maps showing marginal and fragile soils, including excessive gradients and peat soils, shall be available and used to identify areas to be avoided. - Major compliance – | There is no new planting within certified area of PT Inti Indosawit Subur – Tungkal Ulu Estate and Tungkal Ulu Plasma after November 2005. Currently, replanting activities still in progress. Original year of Planting for Tungkal Ulu Estate are 1990, 1991, 1993 and 2003. Wilst year of Planting for Tungkal Ulu Plasma are 1990, 1991, 1992, 1993 and 1994. This indicator is not applicable. | N/A |
| 7.4.2 | Where limited planting on fragile and marginal soils, including peat, is proposed, a documented plan shall be developed and implemented to protect | There is no new planting within certified area of PT Inti Indosawit Subur – Tungkal Ulu Estate and Tungkal Ulu Plasma after November 2005. Currently, replanting activities still in progress. Original year of Planting for Tungkal Ulu Estate are 1990, 1991, 1993 and 2003. Wilst year of Planting for Tungkal Ulu Plasma are 1990, 1991, 1992, 1993 and 1994. This indicator is not applicable. | N/A |

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| | them without incurring adverse impacts. - Major compliance – | | |
| Criterion 7.5 | | | |
| No new plantings are established on local people’s land where it can be demonstrated that there are legal, customary or user rights, without their free, prior and informed consent. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions. | | | |
| 7.5.1 | Evidence shall be available that affected local peoples understand they have the right to say ‘yes’ or ‘no’ to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the grower/miller is signed and ratified by these local peoples (see Criteria 2.2, 2.3, 6.2, 6.4 and 7.6) - Major compliance – | There is no new planting within certified area of PT Inti Indosawit Subur – Tungkal Ulu Estate and Tungkal Ulu Plasma after November 2005. Currently, replanting activities still in progress. Original year of Planting for Tungkal Ulu Estate are 1990, 1991, 1993 and 2003. Wilst year of Planting for Tungkal Ulu Plasma are 1990, 1991, 1992, 1993 and 1994. This indicator is not applicable. | N/A |
| Criterion 7.6 | | | |
| Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their free, prior and informed consent and negotiated agreements. | | | |
| 7.6.1 | Records of identification and assessment of legal, customary and user rights shall be available. - Major compliance – | There is no new planting within certified area of PT Inti Indosawit Subur – Tungkal Ulu Estate and Tungkal Ulu Plasma after November 2005. Currently, replanting activities still in progress. Original year of Planting for Tungkal Ulu Estate are 1990, 1991, 1993 and 2003. Wilst year of Planting for Tungkal Ulu Plasma are 1990, 1991, 1992, 1993 and 1994. This indicator is not applicable. | N/A |
| 7.6.2 | A procedure for identifying people entitled to compensation shall be available. | There is no new planting within certified area of PT Inti Indosawit Subur – Tungkal Ulu Estate and Tungkal Ulu Plasma after November 2005. Currently, replanting activities still in progress. Original | N/A |

| | | | |
|-------|---|---|-----|
| | - Major compliance – | year of Planting for Tungkal Ulu Estate are 1990, 1991, 1993 and 2003. Wilst year of Planting for Tungkal Ulu Plasma are 1990, 1991, 1992, 1993 and 1994. This indicator is not applicable. | |
| 7.6.3 | Records of calculation system and distribution of fair compensation shall be available. - Major compliance – | There is no new planting within certified area of PT Inti Indosawit Subur – Tungkal Ulu Estate and Tungkal Ulu Plasma after November 2005. Currently, replanting activities still in progress. Original year of Planting for Tungkal Ulu Estate are 1990, 1991, 1993 and 2003. Wilst year of Planting for Tungkal Ulu Plasma are 1990, 1991, 1992, 1993 and 1994. This indicator is not applicable. | N/A |
| 7.6.4 | Communities that have lost access and rights to land for plantation expansion shall be given opportunities to benefit from plantation development. - Minor compliance – | There is no new planting within certified area of PT Inti Indosawit Subur – Tungkal Ulu Estate and Tungkal Ulu Plasma after November 2005. Currently, replanting activities still in progress. Original year of Planting for Tungkal Ulu Estate are 1990, 1991, 1993 and 2003. Wilst year of Planting for Tungkal Ulu Plasma are 1990, 1991, 1992, 1993 and 1994. This indicator is not applicable. | N/A |
| 7.6.5 | The process and outcome of any compensation claims shall be documented and made available to the affected communities and their representatives. - Minor compliance – | There is no new planting within certified area of PT Inti Indosawit Subur – Tungkal Ulu Estate and Tungkal Ulu Plasma after November 2005. Currently, replanting activities still in progress. Original year of Planting for Tungkal Ulu Estate are 1990, 1991, 1993 and 2003. Wilst year of Planting for Tungkal Ulu Plasma are 1990, 1991, 1992, 1993 and 1994. This indicator is not applicable. | N/A |
| 7.6.6 | Evidence shall be available that the affected communities and rights holders have access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands. - Minor compliance – | There is no new planting within certified area of PT Inti Indosawit Subur – Tungkal Ulu Estate and Tungkal Ulu Plasma after November 2005. Currently, replanting activities still in progress. Original year of Planting for Tungkal Ulu Estate are 1990, 1991, 1993 and 2003. Wilst year of Planting for Tungkal Ulu Plasma are 1990, 1991, 1992, 1993 and 1994. This indicator is not applicable. | N/A |

Criterion 7.7

| | | | |
|--|---|---|-----|
| No use of fire in the preparation of new plantings other than in specific situations, as identified in the ASEAN Guidelines or other regional best practice. | | | |
| 7.7.1 | Records of zero burning implementation on land clearing, referring to the ASEAN Policy on zero burning (2003) and recognised techniques based on the existing regulations shall be available. - Major compliance – | There is no new planting within certified area of PT Inti Indosawit Subur – Tungkal Ulu Estate and Tungkal Ulu Plasma after November 2005. Currently, replanting activities still in progress. Original year of Planting for Tungkal Ulu Estate are 1990, 1991, 1993 and 2003. Wilst year of Planting for Tungkal Ulu Plasma are 1990, 1991, 1992, 1993 and 1994. This indicator is not applicable. | N/A |
| 7.7.2 | In exceptional cases where fire has to be used for preparing land for planting, there shall be evidence of prior approval of the controlled burning as specified in 'Guidelines for the Implementation of the ASEAN on Zero Burning' 2003, or comparable guidelines in other regions. - Minor compliance – | There is no new planting within certified area of PT Inti Indosawit Subur – Tungkal Ulu Estate and Tungkal Ulu Plasma after November 2005. Currently, replanting activities still in progress. Original year of Planting for Tungkal Ulu Estate are 1990, 1991, 1993 and 2003. Wilst year of Planting for Tungkal Ulu Plasma are 1990, 1991, 1992, 1993 and 1994. This indicator is not applicable. | N/A |
| Criterion 7.8 | | | |
| New plantation developments are designed to minimize net greenhouse gas emissions. | | | |
| 7.8.1 | The carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development shall be identified and estimated. - Major compliance – | There is no new planting within certified area of PT Inti Indosawit Subur – Tungkal Ulu Estate and Tungkal Ulu Plasma after November 2005. Currently, replanting activities still in progress. Original year of Planting for Tungkal Ulu Estate are 1990, 1991, 1993 and 2003. Wilst year of Planting for Tungkal Ulu Plasma are 1990, 1991, 1992, 1993 and 1994. This indicator is not applicable. | N/A |
| 7.8.2 | Records of a plan to minimize net GHG emissions shall be available. - Minor compliance – | There is no new planting within certified area of PT Inti Indosawit Subur – Tungkal Ulu Estate and Tungkal Ulu Plasma after November 2005. Currently, replanting activities still in progress. Original year of Planting for Tungkal Ulu Estate are 1990, 1991, 1993 and 2003. Wilst year of Planting for Tungkal Ulu Plasma are 1990, 1991, 1992, 1993 and 1994. This indicator is not applicable. | N/A |

| Principle 8: Commitment to continuous improvement in key areas of activity | | | | | | | | | | | | | | | | | |
|---|---|---|---------------------|---------------------------------|--------------|---|---|-----------|--|--|----------|--|---|-------------|-----------------------------------|------------------|---------------|
| Criterion 8.1 | | | | | | | | | | | | | | | | | |
| Growers and millers regularly monitor and review their activities, and develop and implement action plans that allow demonstrable continual improvement in key operations. | | | | | | | | | | | | | | | | | |
| <p>8.1.1</p> <p>The action plan for monitoring shall be available, based on a consideration of the social and environmental impacts and routine evaluation of the plantation and mill operations. As a minimum, these shall include, but are not necessarily be limited to:</p> <ul style="list-style-type: none"> • Reduction in use of certain chemicals (Criterion 4.6); • Environmental impacts (Criteria 4.3, 5.1 and 5.2); • Waste reduction (Criterion 5.3); • Pollution and greenhouse gas (GHG) emissions (Criteria 5.6 and 7.8); • Social impacts (Criterion 6.1); • Optimising the yield of FFB production (Criterion 4.2) <p>- Major compliance –</p> | <p>Estate: Reduction in use of certain chemicals: mixing gramoxone with salt;</p> <p>Environmental impact: mechanization for soil mesh for soil-filling in nursery. Proposed benefit: reduce manpower use, reduce supervision cost, improve output on soil-filling activity, started in June 2018. Result presented in January 2019, with benefit: required 3 mandays; output 1,326 kg soil per manday; better quality; dirt reduced into 13%; soil size 5-10 cm – saving potency for 651 Ha replanting planned in 2019 (132,153 seedling requirement) is Rp.2**,***,***.</p> <p>Mill: Continuous Improvement 2019</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 20%;">Station</th> <th style="width: 40%;">Bakcground/abstract</th> <th style="width: 40%;">Continuous Improvement proposed</th> </tr> </thead> <tbody> <tr> <td>Loading ramp</td> <td>- The waste collection from FFB dump truck not optimized – because waste only collected from conveyor loading ramp A; - Loading ramp B does not have mesh to collect waste</td> <td>Create mesh on conveyor’s floor to collect waste from loading ramp B.</td> </tr> <tr> <td>Sortation</td> <td>The harvesting mark recorded manually; Sortation requires more manpower; Sortation requires more time;</td> <td>Create grading table to reduce manpower and reduce time required</td> </tr> <tr> <td>Thresing</td> <td>Effort needed to avoid loose fruit going back to thresher drum and goes out with EFB</td> <td>To install mesh on chute from bunch conveyor onto threshing drum – to collect loose fruit</td> </tr> <tr> <td>Power plant</td> <td>The fossil fuel used remains high</td> <td>Use biogas plant</td> </tr> </tbody> </table> | Station | Bakcground/abstract | Continuous Improvement proposed | Loading ramp | - The waste collection from FFB dump truck not optimized – because waste only collected from conveyor loading ramp A; - Loading ramp B does not have mesh to collect waste | Create mesh on conveyor’s floor to collect waste from loading ramp B. | Sortation | The harvesting mark recorded manually; Sortation requires more manpower; Sortation requires more time; | Create grading table to reduce manpower and reduce time required | Thresing | Effort needed to avoid loose fruit going back to thresher drum and goes out with EFB | To install mesh on chute from bunch conveyor onto threshing drum – to collect loose fruit | Power plant | The fossil fuel used remains high | Use biogas plant | <p>Comply</p> |
| Station | Bakcground/abstract | Continuous Improvement proposed | | | | | | | | | | | | | | | |
| Loading ramp | - The waste collection from FFB dump truck not optimized – because waste only collected from conveyor loading ramp A; - Loading ramp B does not have mesh to collect waste | Create mesh on conveyor’s floor to collect waste from loading ramp B. | | | | | | | | | | | | | | | |
| Sortation | The harvesting mark recorded manually; Sortation requires more manpower; Sortation requires more time; | Create grading table to reduce manpower and reduce time required | | | | | | | | | | | | | | | |
| Thresing | Effort needed to avoid loose fruit going back to thresher drum and goes out with EFB | To install mesh on chute from bunch conveyor onto threshing drum – to collect loose fruit | | | | | | | | | | | | | | | |
| Power plant | The fossil fuel used remains high | Use biogas plant | | | | | | | | | | | | | | | |

| | | | | <p>Resulted increase energy from renewable source per ton CPO production</p> <table border="1"> <thead> <tr> <th></th> <th>2016</th> <th>2017</th> <th>2018</th> </tr> </thead> <tbody> <tr> <td>Fossil</td> <td>0.027 GJ/ton CPO</td> <td>0.012 GJ/ton CPO</td> <td>0.004 GJ/ton CPO</td> </tr> <tr> <td>Renewable</td> <td>0.393 GJ/ton CPO</td> <td>0.399 GJ/ton CPO</td> <td>0.604 GJ/ton CPO</td> </tr> <tr> <td>Total Energy</td> <td>0.419 GJ/ton CPO</td> <td>0.410 GJ/ton CPO</td> <td>1.030 GJ/ton CPO</td> </tr> </tbody> </table> | | 2016 | 2017 | 2018 | Fossil | 0.027 GJ/ton CPO | 0.012 GJ/ton CPO | 0.004 GJ/ton CPO | Renewable | 0.393 GJ/ton CPO | 0.399 GJ/ton CPO | 0.604 GJ/ton CPO | Total Energy | 0.419 GJ/ton CPO | 0.410 GJ/ton CPO | 1.030 GJ/ton CPO | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--------------------------|-----------------------------|--|---|---|--|------|------|------|-----------|------------------------|------------------------|------------------------|-----------|------------------------|------------------------|------------------------|--------------|------------------------|------------------------|------------------------|-------------|------------------------|------------------------|------------------------|---------------------|------------------------|------------------------|------------------------|--------------|-------------------------|-------------------------|--------------------------|-------------|-------------|-------------|-------------|---------------------|-----------------------------|-----------------------------|-----------------------------|----------------------|-----------------------------|-----------------------------|-----------------------------|--------------------------|-----------------------------|-----------------------------|-----------------------------|
| | 2016 | 2017 | 2018 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Fossil | 0.027 GJ/ton CPO | 0.012 GJ/ton CPO | 0.004 GJ/ton CPO | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Renewable | 0.393 GJ/ton CPO | 0.399 GJ/ton CPO | 0.604 GJ/ton CPO | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Total Energy | 0.419 GJ/ton CPO | 0.410 GJ/ton CPO | 1.030 GJ/ton CPO | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Water treatment | To reduce the use of water for process | Reduce water for process by using water from vacuum drier process as dilluting water. | <table border="1"> <thead> <tr> <th></th> <th>2016</th> <th>2017</th> <th>2018</th> </tr> </thead> <tbody> <tr> <td>Raw water</td> <td>437,575 m³</td> <td>558,228 m³</td> <td>498,133 m³</td> </tr> <tr> <td>Process</td> <td>259,391 m³</td> <td>371,986 m³</td> <td>318,313 m³</td> </tr> <tr> <td>Domestic</td> <td>178,184 m³</td> <td>186,242 m³</td> <td>179,820 m³</td> </tr> <tr> <td>Demin Plant</td> <td>188,207 m³</td> <td>242,868 m³</td> <td>228,670 m³</td> </tr> <tr> <td>Boiler/ Internal</td> <td>188,081 m³</td> <td>240,521 m³</td> <td>228,064 m³</td> </tr> <tr> <td>Total</td> <td>1,251,417m³</td> <td>1,599,845m³</td> <td>1,453,000 m³</td> </tr> <tr> <td>FFB process</td> <td>253,120 ton</td> <td>317,667 ton</td> <td>304,463 ton</td> </tr> <tr> <td>Consumption process</td> <td>1.02m³/ton FFB</td> <td>1.17m³/ton FFB</td> <td>1.05m³/ton FFB</td> </tr> <tr> <td>Consumption Domestic</td> <td>0.70m³/ton FFB</td> <td>0.59m³/ton FFB</td> <td>0.59m³/ton FFB</td> </tr> <tr> <td>Total consumption</td> <td>1.73m³/ton FFB</td> <td>1.76m³/ton FFB</td> <td>1.64m³/ton FFB</td> </tr> </tbody> </table> | | 2016 | 2017 | 2018 | Raw water | 437,575 m ³ | 558,228 m ³ | 498,133 m ³ | Process | 259,391 m ³ | 371,986 m ³ | 318,313 m ³ | Domestic | 178,184 m ³ | 186,242 m ³ | 179,820 m ³ | Demin Plant | 188,207 m ³ | 242,868 m ³ | 228,670 m ³ | Boiler/ Internal | 188,081 m ³ | 240,521 m ³ | 228,064 m ³ | Total | 1,251,417m ³ | 1,599,845m ³ | 1,453,000 m ³ | FFB process | 253,120 ton | 317,667 ton | 304,463 ton | Consumption process | 1.02m ³ /ton FFB | 1.17m ³ /ton FFB | 1.05m ³ /ton FFB | Consumption Domestic | 0.70m ³ /ton FFB | 0.59m ³ /ton FFB | 0.59m ³ /ton FFB | Total consumption | 1.73m ³ /ton FFB | 1.76m ³ /ton FFB | 1.64m ³ /ton FFB |
| | 2016 | 2017 | 2018 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Raw water | 437,575 m ³ | 558,228 m ³ | 498,133 m ³ | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Process | 259,391 m ³ | 371,986 m ³ | 318,313 m ³ | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Domestic | 178,184 m ³ | 186,242 m ³ | 179,820 m ³ | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Demin Plant | 188,207 m ³ | 242,868 m ³ | 228,670 m ³ | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Boiler/ Internal | 188,081 m ³ | 240,521 m ³ | 228,064 m ³ | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Total | 1,251,417m ³ | 1,599,845m ³ | 1,453,000 m ³ | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| FFB process | 253,120 ton | 317,667 ton | 304,463 ton | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Consumption process | 1.02m ³ /ton FFB | 1.17m ³ /ton FFB | 1.05m ³ /ton FFB | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Consumption Domestic | 0.70m ³ /ton FFB | 0.59m ³ /ton FFB | 0.59m ³ /ton FFB | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Total consumption | 1.73m ³ /ton FFB | 1.76m ³ /ton FFB | 1.64m ³ /ton FFB | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| | | <p>Smallholder: Internal audit for scheme smallholder carried out 12-14 December 2018 by Hendryk Simanjutak, Ridho Ilahi, Ian Septian. 3 findings related to seedling certificate – seedling certificate documents made available in scheme smallholder/plasma office (closed 28 January 2019); no program for fossil fuel efficiency – prepare fossil fuel efficiency program and made reminder (closed 28 January 2019); no record on PPE handover to smallholder/KUD – filling documentation on PPE handover and scheduled (closed 28 January 2019).</p> | |
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RSPO Public Summary Report
Revision 8 (Mar /2019)

Appendix B: Approved Time Bound Plan

| Name of Mill | Mill Address | Name of Supply Base Plantation | Estate Address | Time Bound for Certification | Status |
|-------------------|--|--------------------------------|--|------------------------------|--|
| Buatan I Mill | Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau | Buatan Estate | Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau | | Certified on 16 September 2010 Re-Certified on 16 September 2015 |
| | | Buatan (Plasma) | Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau | | |
| Buatan II Mill | Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau | Simpang Perak Estate*) | Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau | | Certified on 16 September 2010 Re-Certified on 16 September 2015 <i>Note: *) Split from Buatan Estate since 1 January 2019</i> |
| | | Buatan (Plasma) | Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau | | |
| Ukui I Mill | Ukui Village, Ukui District, Pelalawan Regency, Riau | Ukui Estate | Ukui Village, Ukui District, Pelalawan Regency, Riau | | Certified on 1 March 2011 Re-Certified on 1 March 2016 <i>Note: *) Split from Ukui Estate since 1 January 2019</i> |
| | | Sei Lala Estate*) | Ukui Village, Ukui District, Pelalawan Regency, Riau | | |
| | | Ukui (Plasma) | Ukui & Lubuk Batu Jaya District, Pelalawan & Inhu Regency, Riau | | |
| Ukui II Mill | Ukui Village, Ukui District, Pelalawan Regency, Riau | Soga Estate | Ukui Village, Ukui District, Pelalawan Regency, Riau | | Certified on 1 March 2011 Re-Certified on 1 March 2016 |
| | | Ukui (Plasma) | Ukui & Lubuk Batu Jaya District, Pelalawan & Inhu Regency, Riau | | |
| Tungkal Ulu Mill | Pulau Pauh / Penyabungan / Merlung Village, Tungkal Ulu District, Tanjung Jabung Regency, Jambi | Tungkal Ulu Estate | Pulau Pauh / Penyabungan / Merlung Village, Tungkal Ulu District, Tanjung Jabung Regency, Jambi | | Certified on 15 August 2012 Re-Certification on 15 August 2017 Certified on 11 July 2013 Re-Certification on 15 August 2017 |
| | | Tungkal Ulu (Plasma) | Renah Mendalo, Merlung, Muara Papalik District, Tanjung Jabung Barat Regency, Jambi | | |
| Muara Bulian Mill | Singoan / Bukit Sari / Bulian Jaya Village, Muara Bulian / Pelayung District, Batang Hari Regency, Jambi | Muara Bulian Estate | Singoan / Bukit Sari / Bulian Jaya Village, Muara Bulian / Pelayung District, Batang Hari Regency, Jambi | | Certified on 28 August 2012 Re-Certification on 28 August 2017 |

| Name of Mill | Mill Address | Name of Supply Base Plantation | Estate Address | Time Bound for Certification | Status |
|-------------------|---|--|---|------------------------------|--|
| | | Muara Bulian (Plasma) | Maro Sebo Ilir District, Batang Hari Regency, Jambi | | Certified on 12 July 2013 Re-Certification on 28 August 2017 |
| Topaz Mill | Petapahan village, Tapung District, Kampar Regency, Riau | Topaz & Seed Garden Estate | Petapahan village, Tapung District, Kampar Regency, Riau | | Certified on 30 March 2015 |
| Taman Raja Mill | Lubuk Bernai / Kampung Baru / Pelabuhan Dagang / Pematang Pauh Village, Tungkal Ulu District, Tanjung Jabung Regency, Jambi | Taman Raja Estate, Badang Estate & Bernai Estate | Lubuk Bernai / Kampung Baru / Pelabuhan Dagang / Pematang Pauh Village, Tungkal Ulu District, Tanjung Jabung Regency, Jambi | | Certified on 20 February 2015 <i>Note: *) Bernai Estate split from Badang Estate since 1 January 2019</i> |
| Segati Mill | Langkan / Penarikan / Tambak / Sotol Village, Langgam District, Pelalawan Regency, Riau | Segati Estate | Langkan / Penarikan / Tambak / Sotol Village, Langgam District, Pelalawan Regency, Riau | Main Audit 2014 | NPP and RaCP is still in progress. Re-Audit 2018 |
| | | Penarikan & Gondai Estate | Pangkalan Sarik / Baru Village, Langgam / Siak Hulu District, Pelalawan / Kampar Regency, Riau | Main Audit 2014 | NPP and RaCP is still in progress. Re-Audit 2018 |
| Tanah Datar Mill | Tanah Datar Petatal Village, Talawi District, Asahan Regency, North Sumatera | Tanah Datar Estate | Tanah Datar Petatal Village, Talawi District, Asahan Regency, North Sumatera | | Certified on 18 May 2015 |
| | | Bahilang Estate | Bahilang Village, Tebing Tinggi District, Serdang Bedagai Regency, North Sumatera | | |
| Aek Nabara Mill | S1-S3 / Sukadame Village, Bilah Hulu / Kota Pinang District, Labuhan Batu Regency, North Sumatera | Aek Nabara Estate | S1-S3 / Sukadame Village, Bilah Hulu / Kota Pinang District, Labuhan Batu Regency, North Sumatera | | Certified on 6 March 2015 |
| Teluk Panjie Mill | Teluk Panjie Village, Kampung Rakyat District, Labuhan Batu Regency, North Sumatera | Teluk Panjie Estate (3,885 Ha) | Teluk Panjie Village, Kampung Rakyat District, Labuhan Batu Regency, North Sumatera | | Certified on 21 April 2015 |
| | | Teluk Panjie Estate (801 Ha) | | 2020 | HGU is still in process |
| Peranap Mill | Simelinyang / Pauh Ranap / Sengkilo Village, Peranap District, Indragiri Hulu Regency, Riau | Peranap Estate | Simelinyang / Pauh Ranap / Sengkilo Village, Peranap District, Indragiri Hulu Regency, Riau | | Certified on 7 January 2015 |
| | | Peranap (Plasma) | Simelinyang / Pauh Ranap / Sengkilo Village, Peranap District, Indragiri Hulu Regency, Riau | | Certified on 18 August 2016 |
| Bungo Tebo Mill | Tuo Sumai / Sungai Rambai Village, PWK Sumai / Tebo Ulu | Bungo Tebo Estate | Tuo Sumai / Sungai Rambai Village, PWK Sumai / Tebo Ulu | | Certified on 3 December 2015 |

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| Name of Mill | Mill Address | Name of Supply Base Plantation | Estate Address | Time Bound for Certification | Status |
|----------------------|--|--|---|---|--|
| | District, Bungo Tebo Regency, Jambi | | District, Bungo Tebo Regency, Jambi | | |
| | | Bungo Tebo (Plasma) | Tuo Sumai / Sungai Rambai Village, PWK Sumai / Tebo Ulu District, Bungo Tebo Regency, Jambi | | Certified on 7 February 2017 |
| Tanjung Selamat Mill | Kampung Padang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra | Tanjung Selamat | Kampung Padang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra | | Certified on 26 May 2015 |
| | | Pangkatan | Sennah Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra | | Certified on 26 May 2015 |
| Gunung Melayu I | Rahuning Village, Bandar Pulau District, Asahan Regency, North Sumatra | Pulau Maria Estate | Rahuning Village, Bandar Pulau District, Asahan Regency, North Sumatra | | Certified on 7 September 2015 |
| Gunung Melayu II | Gonting Mahala Village, Bandar Pulau District, Asahan Regency, North Sumatra | Sentral, Aek Tarum & Batu Anam Estate | Gonting Mahala Village, Bandar Pulau District, Asahan Regency, North Sumatra | | Certified on 8 July 2015 |
| Negri Lama II | Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra | Negeri Lama | Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra | | <ul style="list-style-type: none"> - Certified on 23 December 2016 as independent Mill - Audit in 2016 as Mill and Supply base |
| | | Aek Kuo (2,088 Ha) | Aek Korsik Village, Aek Natas District, Labuhan Batu Regency, North Sumatra | | |
| | | Aek Kuo (501 Ha) | | HGU Completed. Audited at ASA 3 (2018). | |
| Negri Lama I | Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra | *3 rd party which is excluded from scope of certification | Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra | | <ul style="list-style-type: none"> - Certified on 8 April 2015 - Audit in 2016 as independent Mill |

Note: updated by the company on 1 January 2019.

Appendix C: GHG Reporting Executive Summary

The GHG emissions that were produced in 2018 for PT Inti Indosawit Subur – Tungkal Ulu POM and supply base was calculated using the PalmGHG Calculator version 3.0.1. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in 2018 for PT Inti Indosawit Subur – Tungkal Ulu POM and supply base are as following:

| Emission per product | tCO ₂ e/tProduct |
|----------------------|-----------------------------|
| CPO | 0.02 |
| PKO | 0.02 |

| Extraction | % |
|------------|-------|
| OER | 21.07 |
| KER | 5.26 |

| Production | t/yr |
|--------------|-----------|
| FFB Process | 304,737 |
| CPO Produced | 64,196 |
| PKO Produced | 10,995.89 |

| Land Use | Ha |
|-----------------------------|------------------|
| OP Planted Area | 13,658.00 |
| OP Planted on peat | 0 |
| Conservation (forested) | 0 |
| Conservation (non-forested) | 131.32 |
| Total | 13,789.32 |

Summary of Field Emission and Sink

| | Own Crop* | | Group | | 3 rd Party | | Total | |
|--|--------------------|--------------------------|--------------------|--------------------------|-----------------------|--------------------------|--------------------|--------------------------|
| | tCO ₂ e | tCO ₂ e / FFB | tCO ₂ e | tCO ₂ e / FFB | tCO ₂ e | tCO ₂ e / FFB | tCO ₂ e | tCO ₂ e / FFB |
| Emission | | | | | | | | |
| Land Conversion | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| CO ₂ Emission from fertilizer | 2,111.69 | 0.03 | 7,879 | 0.08 | 0 | 0 | 9,990.69 | 0.11 |
| NO ₂ Emmision | 3,443.64 | 0.05 | 6,733 | 0.07 | 0 | 0 | 10,176.64 | 0.12 |
| Fuel Consumption | 1,799.46 | 0.03 | 1,484 | 0.01 | 0 | 0 | 3,283.46 | 0.04 |
| Peat Oxidation | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |

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| Sink | | | | | | | | |
|----------------------------|-----------------|------------|---------------|-------------|---------------|----------|------------------|-------------|
| Crop Sequestration | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Conservation Sequestration | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total | 7,354.79 | 0.1 | 16,096 | 0.16 | 10,678 | 0 | 23,450.79 | 0.27 |

*Note: Includes both estates and Smallholder

Summary of Mill Emission and Credit

| | tCO₂e | tCO₂e/tFFB |
|------------------------------|-------------------------|------------------------------|
| Emission | | |
| POME | 4,125.19 | 0.01 |
| Fuel Consumption | 206.41 | 0 |
| Grid Electricity Utilisation | 0 | 0 |
| Credit | | |
| Export of Grid Electricity | 0 | 0 |
| Sales of PKS | -36,493.6 | -0.12 |
| Sales of EFB | 0 | 0 |
| Total | -32,162 | -0.11 |

Summary of Kernel Crusher Emission and Credit (if applicable)

| Emissions | tCO₂e |
|--------------------------------|-------------------------|
| PK from own mill | 393.2 |
| PK from other source | 0 |
| Fuel Consumptions | 0 |
| Total Crusher emissions | 393.2 |

*This mill has no kernel crusher operation.

| Palm Oil Mill Effluent (POME) Treatment: | |
|---|-----|
| Divert to Compost (%) | 0 |
| Divert to anaerobic diversion (%) | 100 |

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

Appendix D: General Chain of Custody Requirements for the Supply Chain

| 5.1 Applicability of the general chain of custody requirements for the supply chain | | | |
|--|---|---|--|
| | Requirement | Evidence For any N/A raised, justification is required. | Compliance (Yes / No or N/A) |
| 5.1.1 | The General Chain of Custody requirements of the RSPO Supply Chain Standard shall apply to any organization throughout the supply chain that takes legal ownership and physically handles RSPO Certified Sustainable oil palm products at a location under the control of the organization including outsourced contractors. After the end product manufacturer, there is no further requirement for certification. | PT. Inti Indosawit Subur – Tungkal Ulu POM is part of the RSPO supply chain, as the organization takes legal ownership and physically handles RSPO Certified Sustainable oil palm products – therefore this requirements is applicable. | Yes |
| 5.1.2 | Traders and distributors require a licence obtained from RSPO Secretariat to sell RSPO certified product but do not themselves require certification. When selling RSPO certified products, a licensed trader and/or distributor shall pass on the certification number of the product manufacturer and the applicable supply chain model. | PT. Inti Indosawit Subur – Tungkal Ulu POM is not a trader or distributor. Not applicable. | N/A |
| 5.1.3 | Either the operator at site level or its parent company seeking certification shall be a member of the RSPO and shall register on the RSPO IT platform. | PT. Inti Indosawit Subur – Tungkal Ulu POM is subsidiary of PT. Inti Indosawit Subur, a member of RSPO, with RSPO membership No.1-0022-06-000-00 since 6 February 2006. RSPO IT Platform/PalmTrace account RSPO_PO1000000345. | Yes |
| 5.1.4 | Processing aids do not need to be included within an organization’s scope of certification. | PT. Inti Indosawit Subur – Tungkal Ulu POM does not include any processing aid for their CPO Mill into scope of certification. Not applicable. | N/A |
| 5.2 Supply chain model | | | |

| | | | |
|-----------------------------------|---|---|-----|
| 5.2.1 | <p>The site can only use the same supply chain model as its supplier or go to a less strict system. Declassification/downgrading can only be done in the following order: Identity Preserved -> Segregated -> Mass Balance.</p> | <p>PT. Inti Indosawit Subur – Tungkal Ulu POM is certified against RSPO P&C Indonesia National Interpretation, September 2016 and RSPO Supply Chain Certification Standard, June 2017 Module E - CPO Mills: Mass Balance. Tungkal Ulu POM received certified raw material (Fresh Fruit Bunch) from its own estate - Tungkal Ulu Estate; and 10 scheme Smallholder in form of cooperative/Koperasi Unit Desa (KUD). The proportion of non-certified FFB comes from third-party supplier.</p> <p>The certification of estates and scheme Smallholder are fall under PT. Inti Indosawit Subur – Tungkal Ulu POM with certificate number RSPO 594422, first certification start on 15 August 2012 and expired on 14 August 2022.</p> <p>Management of PT. Inti Indosawit Subur aware that they can claim their product (CPO and PK) as Mass Balance because there is a proportion of non-certified FFB being processe in the Tungkal Ulu POM.</p> | Yes |
| 5.2.2 | <p>The site can use one (1) or a combination of supply chain models as audited and certified by the CB.</p> | <p>PT. Inti Indosawit Subur – Tungkal Ulu POM uses Module E of RSPO Supply Chain Certification Standard, June 2017. Therefore, Tungkal Ulu POM uses Mass Balance (MB) as the supply chain model.</p> <p>Based on review of Contract documents, for shipping by trucking, PT. Inti Indosawit Subur – Tungkal Ulu POM uses Mass Balance (MB) as the supply chain model.</p> | Yes |
| 5.3. Documented Procedures | | | |
| 5.3.1 | <p>The site shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> • Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. | <p>PT. Inti Indosawit Subur – Tungkal Ulu POM can demonstrate procedures as follow:</p> <ul style="list-style-type: none"> • Standard Operating Procedures – Traceability (AA-MPM-OP-1400.17.R6) dated 1 September 2017. The procedures cover traceability of CPO and PK, since FFB receiving from Tungkal Ulu Estate and Smallholder, processing up to shipping of CPO and PK as well as daily production report. The procedure also regulates the | Yes |

| | | | |
|--|--|--|--|
| | | <p>internal audit by Sustainability Internal Audit Manager. Traceability records are to be kept for 10 years.</p> <ul style="list-style-type: none"> • Standard Operating Procedure – Book Keeping (AA-MPM-OP-1400.18-R4). The procedure explains method to check only certified product received. The book keeping mass balance stated every 3 months: January-March, April-June, July-September, and October-December each year. Head of Environment and Sustainability will inform to Certification Body in the case of projected overproduction. • SOP for mill operation Mill Policy Manual: <ul style="list-style-type: none"> ○ SOP AA-MPM-OP-1400.02.R2 Stasiun Penerimaan for FFB receiving station; ○ SOP AA-SOP-OP-101.5-R0 Grading; ○ SOP AA-MPM-OP-1400.03.R1 Stasiun Rebusan for sterilizer; ○ SOP AA-MPM-OP-1400.04.R1 Stasiun Pemisahan Berondolan for loose fruit separation; ○ SOP AA-MPM-OP-1400.05-R1 Stasiun Pengadukan dan Pengempaan for pressing station; ○ SOP AA-MPM-OP-1400.06-R1 Stasiun Pemurnian for clarification; ○ SOP AA-MPM-OP-1400.07-R1 Stasiun Pemisahan Nut dan Fiber for nut and fiber separation; ○ SOP AA-MPM-OP-1400.08-R1 Stasiun Kernel for kernel station; ○ SOP AA-MPM-OP-1400.09-R1 Stasiun Boiler; ○ SOP AA-MPM-OP-1400.10-R1 Stasiun Engine Room; ○ SOP AA-MPM-OP-1400.11-R1 Stasiun Water Treatment; ○ SOP AA-MPM-OP-1400.12-R1 Laboratorium; ○ SOP AA-MPM-OP-1400.13-R1 Stasiun Pengelolaan Limbah for palm oil mill effluent treatment; ○ SOP AA-MPM-OP-1400.14-R2 Stasiun Penimbunan dan Pengiriman CPO dan Kernel for CPO and PK bulking and despatch operation; ○ SOP AA-MPM-OP-1400.15-R1 Perawatan for preventive maintenance; | |
|--|--|--|--|

| | | | |
|-------|--|--|----------------------------------|
| | | <ul style="list-style-type: none"> ○ SOP AA-MPM-OP-1400.18-R4 Book Keeping ○ AA-MPM-OP-1400.17-R6 Traceability | |
| | <ul style="list-style-type: none"> • Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). | PT Inti Indosawit Subur – Tungkal Ulu POM is able to demonstrate complete and up-to-date records and report demonstrating compliance with the supply chain’s general requirement and modular requirement, including training records (see Clause 5.8 – Training). | Yes |
| | <ul style="list-style-type: none"> • 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 organization’s procedures for the implementation of this standard. | As per Procedure of Traceability (AA-MPM-OP-1400.17-R6), the responsible person in charge to the supply chain system is Mill Manager. During audit, the mill manager is able to demonstrate sufficient knowledge and understanding on RSPO supply chain implementation for palm oil mill. | Yes |
| 5.3.2 | The site shall have a written procedure to conduct annual internal audit to determine whether the organization; i) conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. | As per Procedure of Traceability (AA-MPM-OP-1400.17-R6) chapter 6.7, Sustainability Internal Audit Manager conducted internal audit annually, to ensure all operational and documentation activities are comply with the requirement in RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. The latest internal audit conducted on 23 August 2018 by Mr. Welly Joel Chandra and Mr. Endrasworo Wirawan. | Yes |
| | ii) effectively implements and maintains the standard requirements within its organization | The site has effectively implements and maintains the standard requirement by performing internal audit. Latest RSPO SCC Internal audit in Tungkal Ulu POM carried out on 23 August 2018 by Mr. Welly Joel Chandra and Mr. Endrasworo Wirawan, against RSPO SCCS 2017 – RSPO General Chain of Custody requirements and Module E: Mass Balance. Audit result findings can be demonstrated and the corrective action has been implemented to address issue found during audit. | No (1761451-201905-M3) Yes |

| | | | |
|--|---|---|------------|
| | | <p>Major Non-Conformities: Internal audit RSPO SCCS in PT. Inti Indosawit Subur – Tungkal Ulu POM is not effective.</p> <ol style="list-style-type: none"> 1. Internal audit RSPO SCCS for year 2018 only carried out once, while SOP clearly request for twice per year. 2. The internal audit process – as reported in the checklist implies that the requirements related to RSPO SCCS General Requirement for Chain of Custody 5.5 Outsourcing – deemed not applicable. 3. The internal audit process – as reported for RSPO SCCS clause 5.6.1, 5.7.1, 5.9.3 refers to CPKO production??? | |
| <p>5.4. Purchasing and goods in</p> | | | |
| <p>5.4.1</p> | <p>The receiving site shall ensure that purchases of RSPO certified oil palm products are in compliance and the following minimum information for RSPO certified products is made available by the supplier in document form:</p> <ul style="list-style-type: none"> • The name and address of the buyer; • The name and address of the seller; • The loading or shipment/delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • Supply Chain certificate number of the seller; • A unique identification number | <p>PT Inti Indosawit Subur – Tungkal Ulu POM has demonstrated SOP of Traceability (AA-MPM-OP-1400.7.R6), chapter 5.1 indicates the Weighbridge Clerk has responsibility to input data and print weighbridge card based on “Surat Pengantar TBS”, covering information e.g. estate name and block number, mill name, date of delivery, product description and quantity, RSPO certificate number, transporter identity and unique identification number.</p> <p>PT. Inti Indosawit Subur – Tungkal Ulu POM receive FFB from certified and non-certified source. Certified source consist of own estate (Tungkal Ulu Estate) and Scheme Smallholder (Tungkal Ulu Plasma). Non-certified FFB sourced from third party supplier, e.g.: YES, KSP, HD, KUD Bina Usaha SP1, Victory, Teguh Prayoga, Jaya Mandiri, Merlung Topaz, MH, Gapoktan Maju Jaya, Penyabungan Topaz, Gapoktan Usaha Berkat, Asosiasi Tani Bersama and Novie Zulhi.</p> <p>Document “Surat Pengantar TBS” (FFB Delivery Note) and Kartu Timbangan (Weighbridge Card) described identity and location of FFB source and other item required e.g.</p> <p>Certified FFB: - FFB delivery “Surat Pengantar TBS Tungkal Ulu Estate No.009154” from</p> | <p>Yes</p> |

| | | | |
|--|--|--|--|
| | | <p>Division III, block C91A dated 10 May 2019 – total 200 bunches. Weighbridge ticket “Tiket Timbangan No.PTUA119203619” dated 10 May 2019, for 200 FFB bunches; nett weight 5,700 kg; from Tungkal Ulu Estate, Division III, block C91a; vehicle BH6580MF; RSPO certificate No.RSPO594422.</p> <ul style="list-style-type: none"> - FFB delivery “Surat Pengantar TBS Tungkal Ulu Estate No.007021” from Division I, with FFB: 512 bunches from block A16g and 576 bunches from A16a; dated 10 May 2019 – total 1088 bunches. Weighbridge ticket “Tiket Timbangan No.PTUA119203632” dated 10 May 2019, for 1,088 FFB bunches; nett weight 2,625 kg; from Tungkal Ulu Estate, Division I, block A16a and A16g; vehicle BH6149MF; RSPO certificate No.RSPO594422. - FFB delivery note: “Surat Pengantar TBS KUD Bina Usaha, Hamparan 12 Sawitri Makmur No.0400”, dated 16 February 2019. Vehicle code BE9021TA, driver Eko, carrying 250 bunches. Weighbridge ticket “Tiket Timbangan No.PTUA219101070” dated 16 February 2019, or 250 FFB bunches, nett weight 7,319 kg, FFB source from KUD Bina Usaha, farmer group Sawitri Makmur, vehicle BE9021TA, RSPO certificate No.RSPO594422. - FFB delivery note: “Surat Pengantar TBS KUD Sawit Kita, Hamparan 11 Rajawali No.0357”, dated 16 April 2019. Vehicle code BH8589MK, driver Andi, carrying 300 bunches. Weighbridge ticket “Tiket Timbangan No.PTUA219202221” dated 16 April 2019, or 300 FFB bunches, nett weight 6,455 kg, FFB source from KUD Sawit Kita, farmer group Rajawali, vehicle BH6583MK, RSPO certificate No.RSPO594422. <p>Non-certified FFB:</p> <ul style="list-style-type: none"> - FFB delivery note: “Surat Pengantar TBS HD”, dated 10 May 2019. Vehicle code BH8078MF; driver hairul; carrying 500 bunches. Weighbridge ticket “Tiket Timbangan No.PTUA519204083” dated 10 May 2019, for 500 FFB bunches; nett weight 9,667 kg; FFB source from | |
|--|--|--|--|

| | | | |
|--|--|--|-----|
| | | <p>non-certified third party FFB supplier HD; vehicle BH8018MF.</p> <ul style="list-style-type: none"> - FFB delivery note: "Surat Pengantar TBS Makmur Mandiri", dated 10 May 2019. Vehicle code BH8169EI; driver Gono; carrying 300 bunches. Weighbridge ticket "Tiket Timbangan No.PTUA519204099" dated 10 May 2019, for 300 bunches; nett weight 7,078 kg; FFB source from non-certified third party FFB supplier Makmur Mandiri; vehicle BH8169EI. | |
| | <ul style="list-style-type: none"> • Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation). | Information is complete and presented in couple document, e.g. "Surat Pengantar TBS" (FFB Delivery Note) and Weighbridge Card. Report of FFB receiving are documented in "Laporan Harian Pabrik" (Mill Daily Report), "Laporan Unit Pabrik (Monthly Mill Report) and Mill Summary Report. | Yes |
| | <ul style="list-style-type: none"> • The site receiving RSPO certified oil palm products shall ensure that the products are verified as being RSPO certified. For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements/Announcements and Confirmations on the RSPO IT platform per shipment or group shipments. Refer to section 5.7.1 of this document for further guidance. | PT. Inti Indosawit Subur – Tungkal Ulu POM has ensured that certified FFB received are RSPO certified based on the source of FFB. The Mill only received certified FFB from own estate (Tungkal Ulu Estate) and Scheme Smallholder (Tungkal Ulu Plasma) which have been certified as supply bases of Tungkal Ulu POM. Other than that are non-certified FFB. This is verified through interview with Mill employees and document review. | Yes |
| | <ul style="list-style-type: none"> • A check of the validity of the Supply Chain Certification of suppliers is required for all sites that are SC certified. This shall be checked via the list of RSPO Supply Chain Certified sites on the RSPO website (www.rspo.org) at least annually or through the RSPO IT Platform by confirmation of (shipping) announcements. | PT. Inti Indosawit Subur – Tungkal Ulu POM with RSPO P&C Certificate No.RSPO 594422 are certified until 14 August 2022. | Yes |
| | <ul style="list-style-type: none"> • The validity of licence for traders and distributors shall also be checked via the RSPO website at least annually or through the RSPO IT platform by confirmation of shipping announcements / announcements. | The site has never purchased any certified FFB from traders or distributors. | N/A |

| | | | |
|------------------------------------|---|--|--|
| 5.4.2 | The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents. | PT. Inti Indosawit Subur – Tungkal Ulu POM has demonstrated the simulation on recall of non-conforming material. During the last 12 months period there has been no case of non-conforming material entering the process. | Yes |
| 5.5. Outsourcing activities | | | |
| 5.5.1 | <p>In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the operation seeking or holding certification shall ensure that the independent third party complies with the requirements of the RSPO Supply Chain Certification Standard. A CPO mill and independent mill cannot outsource processing activities like refining or crushing.</p> <p>This requirement is not applicable to outsourced storage facilities where the management of the oil palm product(s) and instructions for tank movements are controlled by the certified organization (not the tank farm manager).</p> | PT. Inti Indosawit Subur – Tungkal Ulu POM is using transportation to move RSPO certified product. The appointed outsourced company is PT. Sumber Kencana Inhu. The clause is applicable. | Yes |
| 5.5.2 | <p>Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following:</p> <p>a. The site has legal ownership of all input material to be included in outsourced processes;</p> | PT. Inti Indosawit Subur – Tungkal Ulu POM having legal ownership of material being transported by PT. Sumber Kencana Inhu. | Yes |
| | <p>b. The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the site to ensure that certification bodies (CBs) have</p> | <p>Major Non-Conformities: PT. Inti Indosawit Subur cannot demonstrate agreement or contract covering the outsourced process with transport contractor.</p> | <p>No (1761451-201905-M4) Yes</p> |

| | | | |
|---------------------------------|---|---|---|
| | access to the outsourcing contractor or operation if an audit is deemed necessary. | | |
| | c. The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. | Major Non-Conformities: PT. Inti Indosawit Subur cannot demonstrate control system and communicated the outsourced process for transport. | No (1761451-201905-M4) Yes |
| | d. The site seeking or holding certification 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 any and all information, when this is announced in advance. | Statement letter from PT. Sumber Kencana Inhu: "Surat Pernyataan Pengangkutan Bahan Baku PT. Sumber Kencana Inhu" signed by President Director – dated May 2019. The statement letter stipulates "we commit to comply to RSPO SCCS requirements during transporting RSPO certified raw material and we allow certification body and/or RSPO auditor to our company/operation if it is deemed necessary". | Yes |
| 5.5.3 | The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products. | PT. Sumber Kencana Inhu Name: Mr. Djohor Djudin Telephone: (+62 769) 21333 Facsimile: (+62 769) 22518 | Yes |
| 5.5.4 | The site shall at its next audit inform its CB of the names and contact details of any new contractor used for the processing or physical handling of RSPO certified oil palm products. | PT. Sumber Kencana Inhu Name: Mr. Djohor Djudin Telephone: (+62 769) 21333 Facsimile: (+62 769) 22518 | Yes |
| 5.6. Sales and goods out | | | |
| 5.6.1 | The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form. <ul style="list-style-type: none"> • The name and address of the buyer; • The name and address of the seller; • The loading or shipment/ delivery date; • The date on which the documents were issued; | Contract: - "Kontrak Penjualan No.03003/CB-10/02/19 antara PT. Inti Indosawit Subur dan PT. Sari Dumai Sejati" dated 1 March 2019 for sales of 487,860 kg commodity Minyak Kelapa Sawit RSPO; Supply Chain Model Mass Balance; Certificate RSPO564422. Remarks: Pihak penjual bertanggungjawab atas penyerahan sampai kawasan berikat PT. Sari Dumai Sejati Lubuk Gaung dengan Ongkos Angkut ditanggung Pihak Pembeli. | No (1761451-201905-M5) Yes |

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| | <ul style="list-style-type: none"> • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • Supply chain certificate number of the seller; • A unique identification number | <ul style="list-style-type: none"> - Delivery Order PT. Inti Indosawit Subur No.03003/DB10/02/19 dated 1 March 2019, instruction to PT. Inti Indosawit Subur – Manager Tangki Timbun Rengat to deliver 487,860 kg commodity Minyak Kelapa Sawit RSPO; Supply Chain Model Mass Balance; No.Ref. RSPO 564422. <p>The Delivery Order was comprise of two smaller Delivery Orders/DO No.01329/DB10/02/19 (21 deliveries) and DO No.11329/DB10/02/18 (8 deliveries). Sample despatch slip from Tungkal Ulu POM to customer based on DO No.11329/DB10/02/18 for period 1 December 2018;</p> <ul style="list-style-type: none"> - Despatch slip Tungkal Ulu POM No.PTUC118202500 dated 1 December 2018. Destination PT. Inti Indosawit Subur-Teluk Bagus, Rengat. Commodity CPO Certified RSPO. Supply Chain Model Mass Balance. RSPO Certificate No.RSPO594422. DO No.11329/DB10/02/18. Transporter PT. Sumber Kencana Inhu, No. SK.01/SKI/12/10; Vehicle No.BM8884BU. Volume dispatched 22.920 MT. Bact No.RSPO564422. - Despatch slip Tungkal Ulu POM No.PTUC118202507 dated 1 December 2018. Destination PT. Inti Indosawit Subur-Teluk Bagus, Rengat. Commodity CPO Certified RSPO. Supply Chain Model Mass Balance. RSPO Certificate No.RSPO594422. DO No.11329/DB10/02/18. Transporter PT. Sumber Kencana Inhu, No. SK.00/SKI/11/10; Vehicle No.BM8088BU. Volume dispatched 22.970 MT. Bact No.RSPO564422. <p>Sample despatch slip from Tungkal Ulu POM to customer based on DO No.11329/DB10/02/18 for period 2 January – 20 May 2019;</p> <ul style="list-style-type: none"> - Despatch slip Tungkal Ulu POM No.PTUC119200224 dated 30 January 2019. Destination PT. Inti Indosawit Subur-Teluk Bagus, Rengat. Commodity CPO Certified RSPO. Supply Chain Model Mass Balance. RSPO Certificate No.RSPO594422. DO No.11329/DB10/02/18 (10,820 kg) and DO No.01329/DB10/02/19 (12,540 kg). Transporter PT. Sumber Kencana Inhu, No. SK.02/SKI/01/19; Vehicle No.BM9445BU. Volume dispatched 23.360 MT. Bact No.RSPO564422. - Despatch slip Tungkal Ulu POM No.PTUC119200235 dated 1 February 2019. Destination PT. Inti Indosawit Subur-Teluk Bagus, Rengat. | |
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| | | <p>Commodity CPO Certified RSPO. Supply Chain Model Mass Balance. RSPO Certificate No.RSPO594422. DO No.01329/DB10/02/19. Transporter PT. Sumber Kencana Inhu, No. SK.04/SKI/02/19; Vehicle No.BM9815BU. Volume dispatched 24.620 MT. Bact No.RSPO564422.</p> <p>This transaction was recorded in PalmTrace as TR-a1abe2bf-23f5, dated 9 April 2019 for CSPO Mass Balance, volume 161.31 MT. Seller PT. Inti Indosawit Subur – Tungkal Ulu. Buyer PT. Sari Dumai Sejati.</p> <ul style="list-style-type: none"> - Name and address of buyer: PT. Sari Dumai Sejati, Jl. M.H Thamrin No.31, Kebon melati, Tanah Abang, Jakarta Pusat, DKI Jakarta 10230. - Name and address of seller: PT. Inti Indosawit Subur, Jl. M.H Thamrin No.31, Kebon melati, Tanah Abang, Jakarta Pusat, DKI Jakarta 10230. - The loading date: 30 November 2018 – 1 February 2019. - The date on which the documents were issued: 1 March 2019. - A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations): Product Minyak Kelapa Sawit RSPO (CSPO). Supply Chain Model Mass Balance (MB). - The quantity of the products delivered: 24.620 MT. - Any related transport documentation: Transporter PT. Sumber Kencana Inhu No.BM9815BU. - Supply chain certificate number of the seller: RSPO Certificate No.RSPO594422. - A unique identification number: DO No.01329/DB10/02/19 and DO No.11329/DB10/02/18. <p>Major Non-Conformities: PT. Inti Indosawit Subur – Tungkal Ulu POM cannot demonstrate maintain accurate RSPO certificate details in the despatch slip for delivery of CSPO to customer, using RSPO 564422 code instead of the correct RSPO 594422.</p> | |
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| | <ul style="list-style-type: none"> Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation). | <p>Information available from contract, delivery order, transfer stock note and weighbridge ticket/delivery slipnote.</p> | <p>Yes</p> |
| | <ul style="list-style-type: none"> For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements / Announcements and Confirmations on the RSPO IT platform per shipment or group of shipments. Refer to section 5.7.1 of this document for further guidance. | <p>PT. Inti Indosawit Subur – Tungkal Ulu POM has made Shipping Announcement in RSPO IT Platform to announce sales of RSPO certified CPO or PK per group of shipments (DO). During ASA1_2 period, Tungkal Ulu POM sold certified product in form of CSPO and CSPK. Samples seen:</p> <ul style="list-style-type: none"> - Shipping Announcement, with transaction ID No.TR-081ac52c-e002 dated 13 December 2018 for 1,041.6 MT of CSPK Mass Balance; from PT. Inti Indosawit Subur – Tungkal Ulu Mill (RSPO_PO1000000345) as Seller to PT. Inti Indosawit Subur – Tungkal Ulu KCP (RSPO_PO1000006596) as Buyer; delivery date 21 November 2018. Confirmation has been made by Buyer on 13 December 2018. - Shipping Announcement, with transaction ID No.TR-a1abe2bf-23f5 dated 9 April 2019 for 161.31 MT of CSPO Mass Balance; from PT. Inti Indosawit Subur – Tungkal Ulu Mill (RSPO_PO1000000345) as Seller to PT. Sari Dumai Sejati (RSPO_PO1000006430). B/L number LUB/TMN-01 dated 16 March 2019, vessel name MT Maersk Trenton V.19501. Confirmation has been made by Buyer on 9 April 2019. | <p>Yes</p> |
| <p>5.7. Registration of transactions</p> | | | |
| <p>5.7.1</p> | <p>Supply chain actors who:</p> <ul style="list-style-type: none"> are mills, traders, crushers and refineries and; take legal ownership and/or physically handle RSPO Certified Sustainable oil palm products that are available in the yield scheme of the RSPO IT Platform (Figure 2 and 3, Refer Annex 1) shall register their transaction in the | <p>PT. Inti Indosawit Subur – Tungkal Ulu POM is a palm oil mill which takes legal ownership and physically handled RSPO certified sustainable oil palm product (FFB, CSPO and CSPK). RSPO IT Platform account RSPO_PO1000000345.</p> | <p>Yes</p> |

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| | RSPO IT platform and confirm upon receipt where applicable. | | |
| 5.7.2 | The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform: <ul style="list-style-type: none"> Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement / Announcement in the RSPO IT Platform. The declaration time to do Shipping announcement / Announcement is based on members' own standard operating procedures. | PT. Inti Indosawit Subur – Tungkal Ulu POM made shipping announcement inside PalmTrace transaction: <ul style="list-style-type: none"> TR-081ac52c-e002 dated 5 May 2019; buyer PT. Sari Dumai Sejati, Product: CSPO; Quantity 161.31 MT; TR-a1abe2bf-23f5 dated 5 May 2019; buyer PT. Inti Indosawit Subur – Tungkal Ulu POM, Product: CSPK; Quantity 1,041.6 MT; | Yes |
| | <ul style="list-style-type: none"> Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace document with a unique traceability number. Tracing can be done in a consolidated way at least annually. | Not applicable for CPO Mills. Not applicable (N/A) | N/A |
| | <ul style="list-style-type: none"> Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed. | PT. Inti Indosawit Subur – Tungkal Ulu POM made remove RSPO certified CSPO from their PalmTrace account: <ul style="list-style-type: none"> Transaction ID: ST-TR-cacb2f19-b758 for removed 8,507.11 MT CSPO from certified stock, dated 21 May 2019; Transaction ID: ST-TR-f8614c2c-5164 for removed 18,218.07 MT CSPO from certified stock, dated 21 May 2019; | Yes |
| | <ul style="list-style-type: none"> Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements. | PT. Inti Indosawit Subur – Tungkal Ulu POM is a palm oil mill which does not need to confirm any purchase of FFB. | N/A |
| 5.8. Training | | | |

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| 5.8.1 | The organization shall have a training plan on RSPO Supply Chain Standards requirements, which is subject to on-going review and is supported by records of the training provided to staff. | PT. Inti Indosawit Subur – Tungkal Ulu POM have prepared a training matrix for implementation of RSPO SCCS, as in “Program Pelatihan Environmental & Sustainability Tahun 2019”. The training matrix for RSPO SCCS: “Pelatihan Supply Chain” planned for December 2019, training participant planned for staff and non-staff; “Pelatihan RSPO Refresh” planned for July 2019, training participant would be staff and non-staff (weighbridge operator, production clerk, process operator, mill assistant, dispatch officer). | Yes |
| 5.8.2 | Appropriate training shall be provided by the organization for personnel carrying out the tasks critical to the effective implementation of the supply chain certification standard requirements. Training shall be specific and relevant to the task(s) performed. | <p>“Pelatihan RSPO Supply Chain” dated 3 August 2018 for 11 personnel – training provided by Welly Joel Chandra (Jakarta HO).</p> <p>Training record:</p> <ul style="list-style-type: none"> - Siti Maryam (weighbridge operator): First aid training on 20 June 2013; “Pelatihan Traceability & Mass Balance (Supply Chain)” – dated 2 November 2013; “Pelatihan Traceability & Mass Balance” – dated 7 June 2017; “Pelatihan Traceability & Mass Balance (Supply Chain)” – dated 3 August 2018; - Sistem Eduard Tarigan (production clerk): First aid training on 16 April 2011; “Pelatihan Traceability & Mass Balance (Supply Chain)” – dated 2 November 2013; “Pelatihan Traceability & Mass Balance” – dated 7 June 2017; “Pelatihan Traceability & Mass Balance (Supply Chain)” – dated 3 August 2018; | Yes |
| 5.9. Record Keeping | | | |
| 5.9.1 | The organization shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements. | <p>PT. Inti Indosawit Subur – Tungkal Ulu POM maintains accurate, complete, up-to-date and accessible records and reports covering all aspects of RSPO Supply Chain Certification Standard requirements.</p> <p>Records and report verified are as follows:</p> <ul style="list-style-type: none"> • Laporan Harian Pabrik (Mill Daily Report); dated 17 May 2019. <ul style="list-style-type: none"> ○ Daily Production Report - “Laporan Harian Pabrik”, dated 17 May 2019: Total initial FFB stock 285,190 kg; FFB from estate 157,080 kg; FFB from scheme smallholder 54,613 kg; FFB from TKD 36,190 | <p>No (1761451-201905-M6) Yes</p> |

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| | | <p>kg; FFB from Third party supplier 255,833 kg; Total received FFB certified 211,693 kg; Total received FFB non-certified 292,023 kg;</p> <ul style="list-style-type: none"> ○ Total FFB processed 615,016 kg; FFB certified processed 173,052 kg; FFB non-certified processed 301,310 kg; Processing hour 10.69 hours; throughput 59.07 ton/hours; ○ Total CPO production 126,210 kg; CPO certified production 61,329 kg; OER FFB certified 22.84%; CPO non-certified production 64,881 kg; OER FFB non-certified 18.59%; ○ Total PK production 31,690 kg; PK certified production 14,161 kg; OER PK certified 5.15%; PK non-certified production 17,529 kg; OER PK non-certified 5.15% <ul style="list-style-type: none"> ● Book Keeping – Mass Balance – CPO and PK period of July – September 2018, October – December 2018, January – March 2019, April – June 2019; ● Kartu Timbangan (Weighbridge Card) FFB; ● Kartu Timbangan (Weighbridge Card) CPO; ● Kartu Timbangan (Weighbridge Card) PK; <p>Major Non-Conformities: PT. Inti Indosawit Subur – Tungkal Ulu POM cannot demonstrate accurate RSPO certificate number in their record and documentation.</p> <ul style="list-style-type: none"> - “Kontrak Penjualan No.03003/CB-10/02/19 antara PT. Inti Indosawit Subur dan PT. Sari Dumai Sejati” dated 1 March 2019 for sales of 487,860 kg commodity Minyak Kelapa Sawit RSPO; Supply Chain Model Mass Balance; Certificate RSPO564422. Remarks: Pihak penjual bertanggungjawab atas penyerahan sampai kawasan berikat PT. Sari Dumai Sejati Lubuk Gaung dengan Ongkos Angkut ditanggung Pihak Pembeli. - Delivery Order PT. Inti Indosawit Subur No.03003/DB10/02/19 dated 1 March 2019, instruction to PT. Inti Indosawit Subur – Manager Tangki Timbun Rengat to deliver 487,860 kg commodity Minyak Kelapa Sawit RSPO; Supply Chain Model Mass Balance; No.Ref. RSPO 564422. | |
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| | | <p>The Delivery Order was comprise of two smaller Delivery Orders/DO No.01329/DB10/02/19 (21 deliveries) and DO No.11329/DB10/02/18 (8 deliveries). Sample despatch slip from Tungkal Ulu POM to customer based on DO No.11329/DB10/02/18 for period 1 December 2018;</p> <ul style="list-style-type: none"> - Despatch slip Tungkal Ulu POM No.PTUC118202500 dated 1 December 2018. Destination PT. Inti Indosawit Subur-Teluk Bagus, Rengat. Commodity CPO Certified RSPO. Supply Chain Model Mass Balance. RSPO Certificate No.RSPO594422. DO No.11329/DB10/02/18. Transporter PT. Sumber Kencana Inhu, No. SK.01/SKI/12/10; Vehicle No.BM8884BU. Volume dispatched 22.920 MT. Batch No.RSPO564422. - Despatch slip Tungkal Ulu POM No.PTUC118202507 dated 1 December 2018. Destination PT. Inti Indosawit Subur-Teluk Bagus, Rengat. Commodity CPO Certified RSPO. Supply Chain Model Mass Balance. RSPO Certificate No.RSPO594422. DO No.11329/DB10/02/18. Transporter PT. Sumber Kencana Inhu, No. SK.00/SKI/11/10; Vehicle No.BM8088BU. Volume dispatched 22.970 MT. Batch No.RSPO564422. <p>Sample despatch slip from Tungkal Ulu POM to customer based on DO No.11329/DB10/02/18 for period 2 January – 20 May 2019;</p> <ul style="list-style-type: none"> - Despatch slip Tungkal Ulu POM No.PTUC119200224 dated 30 January 2019. Destination PT. Inti Indosawit Subur-Teluk Bagus, Rengat. Commodity CPO Certified RSPO. Supply Chain Model Mass Balance. RSPO Certificate No.RSPO594422. DO No.11329/DB10/02/18 (10,820 kg) and DO No.01329/DB10/02/19 (12,540 kg). Transporter PT. Sumber Kencana Inhu, No. SK.02/SKI/01/19; Vehicle No.BM9445BU. Volume dispatched 23.360 MT. Batch No.RSPO564422. - Despatch slip Tungkal Ulu POM No.PTUC119200235 dated 1 February 2019. Destination PT. Inti Indosawit Subur-Teluk Bagus, Rengat. Commodity CPO Certified RSPO. Supply Chain Model Mass Balance. RSPO Certificate No.RSPO594422. DO No.01329/DB10/02/19. | |
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| | | <p>Transporter PT. Sumber Kencana Inhu, No. SK.04/SKI/02/19; Vehicle No.BM9815BU. Volume dispatched 24.620 MT. Batch No.RSPO564422</p> <p>Major Non-Conformities: PT. Inti Indosawit Subur – Tungkal Ulu POM cannot demonstrate maintain accurate RSPO certificate details in the despatch slip for delivery of CSPO to customer.</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|----------|--|---|-----------|----------|-----------|----------|--|----|--|-----------|----------|-----------|----------|-----------|----------|----------|-----------|-----------|----------|----------|----------|--------|----------|-----------|-----------|----------|----------|--------|--------|----------|-----------|-----------|----------|----------|--------|--------|----------|-----------|-----------|----------|----------|----------|--------|----------|-----------|-----------|----------|----------|----------|--------|-----|
| 5.9.2 | Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock. | The procedure of Traceability (AA-MPM-OP-1400.7.R6), requires that all records and reports related to traceability and book keeping are retained for a period of 10 years. | Yes | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 5.9.3 | The organization shall be able to provide the estimate volume of palm oil/palm kernel oil content (separate categories) in the RSPO certified oil palm product and keep an up to date record of the volume purchased (input) and claimed (output) over a period of twelve (12) months. | <p>PT. Inti Indosawit Subur – Tungkal Ulu POM is able to provide estimate volume of CPO and PK in a year period as in "Distribusi Produksi Bulanan Anggaran Tahun 2018" consists estimate of FFB receiving from certified source (Tungkal Ulu Estate and Tungkal Ulu Smallholder) and non-certified source (Third Party supplier), Extraction rates, Processing capacity, working hour and utilisation.</p> <p>The Mill also keep an up to date record of the FFB volume received, CPO and PK produced over a period of twelve (12) month, as in "Book Keeping Mass Balance Report". Below are actual of FFB, CPO and PK for period July 2018 to April 2019:</p> <table border="1"> <thead> <tr> <th rowspan="2">Month</th> <th colspan="2">FFB</th> <th colspan="2">CPO</th> <th colspan="2">PK</th> </tr> <tr> <th>Certified</th> <th>Non-cert</th> <th>Certified</th> <th>Non-cert</th> <th>Certified</th> <th>Non-cert</th> </tr> </thead> <tbody> <tr> <td>Jul 2018</td> <td>19,837.19</td> <td>11,740.95</td> <td>4,235.36</td> <td>2,514.91</td> <td>1,054.83</td> <td>604.66</td> </tr> <tr> <td>Aug 2018</td> <td>17,836.20</td> <td>13,290.28</td> <td>3,832.36</td> <td>2,846.78</td> <td>889.85</td> <td>684.45</td> </tr> <tr> <td>Sep 2018</td> <td>19,700.23</td> <td>12,024.89</td> <td>4,119.24</td> <td>2,575.73</td> <td>963.69</td> <td>619.28</td> </tr> <tr> <td>Oct 2018</td> <td>18,791.21</td> <td>11,942.05</td> <td>3,994.31</td> <td>2,557.99</td> <td>1,010.46</td> <td>615.02</td> </tr> <tr> <td>Nov 2018</td> <td>17,904.27</td> <td>10,215.51</td> <td>3,666.56</td> <td>2,188.16</td> <td>1,005.60</td> <td>526.10</td> </tr> </tbody> </table> | Month | FFB | | CPO | | PK | | Certified | Non-cert | Certified | Non-cert | Certified | Non-cert | Jul 2018 | 19,837.19 | 11,740.95 | 4,235.36 | 2,514.91 | 1,054.83 | 604.66 | Aug 2018 | 17,836.20 | 13,290.28 | 3,832.36 | 2,846.78 | 889.85 | 684.45 | Sep 2018 | 19,700.23 | 12,024.89 | 4,119.24 | 2,575.73 | 963.69 | 619.28 | Oct 2018 | 18,791.21 | 11,942.05 | 3,994.31 | 2,557.99 | 1,010.46 | 615.02 | Nov 2018 | 17,904.27 | 10,215.51 | 3,666.56 | 2,188.16 | 1,005.60 | 526.10 | Yes |
| Month | FFB | | | CPO | | PK | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Certified | Non-cert | Certified | Non-cert | Certified | Non-cert | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Jul 2018 | 19,837.19 | 11,740.95 | 4,235.36 | 2,514.91 | 1,054.83 | 604.66 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Aug 2018 | 17,836.20 | 13,290.28 | 3,832.36 | 2,846.78 | 889.85 | 684.45 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Sep 2018 | 19,700.23 | 12,024.89 | 4,119.24 | 2,575.73 | 963.69 | 619.28 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Oct 2018 | 18,791.21 | 11,942.05 | 3,994.31 | 2,557.99 | 1,010.46 | 615.02 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Nov 2018 | 17,904.27 | 10,215.51 | 3,666.56 | 2,188.16 | 1,005.60 | 526.10 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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|---------------------------------|--|---|-----------|-----------|-----------|----------|----------|--------|--------|----------|-----------|----------|----------|----------|--------|--------|----------|-----------|----------|----------|----------|--------|--------|----------|-----------|----------|----------|----------|--------|--------|----------|-----------|----------|----------|----------|--------|--------|-------|------------|------------|-----------|-----------|-----------|----------|--|
| | | <table border="1"> <tr> <td>Dec 2018</td> <td>14,388.75</td> <td>11,496.40</td> <td>3,131.41</td> <td>2,462.53</td> <td>824.60</td> <td>592.06</td> </tr> <tr> <td>Jan 2019</td> <td>11,741.06</td> <td>9,939.35</td> <td>2,508.04</td> <td>2,129.01</td> <td>648.40</td> <td>511.88</td> </tr> <tr> <td>Feb 2019</td> <td>9,827.299</td> <td>7,105.38</td> <td>2,082.01</td> <td>1,521.97</td> <td>538.72</td> <td>365.93</td> </tr> <tr> <td>Mar 2019</td> <td>9,868.878</td> <td>7,178.39</td> <td>2,069.54</td> <td>1,537.61</td> <td>535.84</td> <td>369.69</td> </tr> <tr> <td>Apr 2019</td> <td>9,674.355</td> <td>7,268.74</td> <td>2,007.57</td> <td>1,556.96</td> <td>505.53</td> <td>374.34</td> </tr> <tr> <td>TOTAL</td> <td>149,569.40</td> <td>102,201.99</td> <td>31,646.44</td> <td>21,891.66</td> <td>7,977.572</td> <td>5,263.40</td> </tr> </table> | Dec 2018 | 14,388.75 | 11,496.40 | 3,131.41 | 2,462.53 | 824.60 | 592.06 | Jan 2019 | 11,741.06 | 9,939.35 | 2,508.04 | 2,129.01 | 648.40 | 511.88 | Feb 2019 | 9,827.299 | 7,105.38 | 2,082.01 | 1,521.97 | 538.72 | 365.93 | Mar 2019 | 9,868.878 | 7,178.39 | 2,069.54 | 1,537.61 | 535.84 | 369.69 | Apr 2019 | 9,674.355 | 7,268.74 | 2,007.57 | 1,556.96 | 505.53 | 374.34 | TOTAL | 149,569.40 | 102,201.99 | 31,646.44 | 21,891.66 | 7,977.572 | 5,263.40 | |
| Dec 2018 | 14,388.75 | 11,496.40 | 3,131.41 | 2,462.53 | 824.60 | 592.06 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Jan 2019 | 11,741.06 | 9,939.35 | 2,508.04 | 2,129.01 | 648.40 | 511.88 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Feb 2019 | 9,827.299 | 7,105.38 | 2,082.01 | 1,521.97 | 538.72 | 365.93 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Mar 2019 | 9,868.878 | 7,178.39 | 2,069.54 | 1,537.61 | 535.84 | 369.69 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Apr 2019 | 9,674.355 | 7,268.74 | 2,007.57 | 1,556.96 | 505.53 | 374.34 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| TOTAL | 149,569.40 | 102,201.99 | 31,646.44 | 21,891.66 | 7,977.572 | 5,263.40 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 5.10. Conversion factors | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 5.10.1 | Where applicable a conversion rate shall be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organizations may determine and set their own conversion rates which shall be based upon past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website (www.rspo.org); RSPO Rules for Physical Transition of Oleochemicals and its Derivaties. This is relevant for derivatives of Palm Oil and Palm Kernel Oil, as used in the oleochemical and personal care industries. | Conversion rate is applied to provide reliable estimation of CPO and PK produced. For year 2019, the budget for conversion from FFB into CPO are 21.07%: For year 2019, the budget for conversion from FFB into PK are 5.26%: | Yes | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 5.10.2 | Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate. | The actual conversion ratio is monitored on daily basis through sounding result and documented in daily report. PT. Inti Indosawit Subur – Tungkal Ulu POM is able to demonstrate the work instruction for analysis of oil content. Based on Laporan Harian Produksi dated 17 May 2019, the sounding result and production report shows that actual conversion ratios from FFB into CPO are: a. For FFB from Tungkal Ulu Estate: 22.84% b. For FFB from Tungkal Ulu Plasma: 21.42% | Yes | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| | | <p>c. For FFB from third-party: 18.59%</p> <p>And actual conversion ratios from FFB into PK are:</p> <p>a. For FFB from Tungkal Ulu Estate: 5.15%</p> <p>b. For FFB from Tungkal Ulu Plasma: 5.15%</p> <p>c. For FFB from third-party: 5.15%</p> | |
| 5.11. Claims | | | |
| 5.11.1 | The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules on Market Communications and Claims. | PT. Inti Indosawit Subur – Tungkal Ulu POM made claims regarding the support of RSPO certified oil palm products in the sales document. The claims made in compliance with RSPO Rules on Market Communications and Claims. | Yes |
| General corporate communications | | | |
| 4.1 | A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim. | PT. Inti Indosawit Subur (with the brand Asian Agri), the parent company of Tungkal Ulu POM is highlighting its commitment to the principles of RSPO, and directly referring to RSPO website. The corporate communication can be found at http://www.asianagri.com . | Yes |
| 4.2 | <p>In corporate communications a member is allowed to:</p> <p>a. Display its RSPO membership status</p> <p>b. Display the RSPO web address (www.rspo.org)</p> <p>c. State that the member supports the work of the RSPO</p> <p>d. State the member's history with regard to the RSPO.</p> <p>e. Use the RSPO trademark to promote its membership of the RSPO.</p> <p>Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at www.rspo.org' where the link must lead to the member's profile page.</p> | <p>PT. Inti Indosawit Subur (with the brand Asian Agri), in its website:</p> <p>a. Display its RSPO membership status: No, PT. Inti Indosawit Subur (with the brand Asian Agri), did not display its RSPO membership status. The CH only stated "In 2006, became a member of the Roundtable of Sustainable Palm Oil. We received our first RSPO certification for our estate in 2010."</p> <p>b. Display the RSPO web address: Not in direct manner. PT. Inti Indosawit Subur (with the brand Asian Agri), made a link to RSPO website.</p> <p>c. State the member supports the work of the RSPO: Not in direct manner. In the website, PT. Inti Indosawit Subur (with the brand Asian Agri), "In 2006, became a member of the Roundtable of Sustainable Palm Oil. We received our first RSPO certification for our estate in 2010."</p> <p>d. State the member's history with regards to the RSPO: Not in direct manner. In the website, In the website, PT. Inti Indosawit Subur (with the brand Asian Agri), "In 2006, became a member of the Roundtable of</p> | Yes |

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| | | Sustainable Palm Oil. We received our first RSPO certification for our estate in 2010, and in 2012, the certification for our smallholder scheme.” Use of RSPO Trademark to promote its membership of the RSPO: No, PT. Inti Indosawit Subur (with the brand Asian Agri), did not use RSPO trademark in its corporate communication such in website. | |
| 4.3 | In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products. | No, PT. Inti Indosawit Subur (with the brand Asian Agri), did not display its RSPO membership status. It is clear that the statement did not lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products. | Yes |
| 4.4 | Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member’s own products. | No, PT. Inti Indosawit Subur (with the brand Asian Agri), did not display its RSPO membership status. It is clear that the statement are clear and did not mislead consumers or other stakeholders as to the certified content of oil palm products in the PT. Inti Indosawit Subur – Tungkal Ulu POM own products. | Yes |
| 4.5 | Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat. | No, PT. Inti Indosawit Subur (with the brand Asian Agri) did not display its RSPO Corporate Logo in any document. | Yes |
| Business to business communications | | | |
| 5.1 | Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products. | There was no use of RSPO trademark and/or RSPO corporate logo in business to business communication related to RSPO certified product; between PT. Inti Indosawit Subur – Tungkal Ulu POM and their buyers. | Yes |
| 5.2 | When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made. | When confirming the sale of certified oil palm products, PT. Inti Indosawit Subur – Tungkal Ulu POM followed the requirements of the RSPO SCCS. PT. Inti Indosawit Subur – Tungkal Ulu POM stating the supply chain model and certificate number under which the claim is being made. | Yes |
| 5.3 | Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the | PT. Inti Indosawit Subur – Tungkal Ulu POM is not a distributor and/or wholesaler. | N/A |

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| | <p>requirements of the RSPO SCCS can follow either of two options:</p> <p>e. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer’s SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.</p> <p>f. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p> | Not applicable. | |
| 5.4 | <p>A certified member can provide information to its customers detailing the presence of certified palm oil contained within a product even if it is not eligible for a product-specific under RSPO rules. The end product must not be labelled as certified or sold in such a way that implies RSPO certification.</p> <p>For example, a retailer or food service company may require a breakdown of all palm based ingredients within an end product and the certified status of each. This information may be provided by a certified RSPO member without constituting a product-specific claim.</p> | <p>PT. Inti Indosawit Subur – Tungkal Ulu POM is not producing or selling end-product to consumer. No labelling on product whatsoever.</p> <p>Not applicable.</p> | N/A |
| Business to consumer communication | | | |
| 6.1 | <p>Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within</p> | <p>PT. Inti Indosawit Subur – Tungkal Ulu POM is not using product-specific claims in its CSPKO product. PT. Inti Indosawit Subur – Tungkal Ulu POM is producing and selling CSPO and CSPK; and not making a business to consumer communication.</p> <p>Not applicable.</p> | N/A |

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

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| | <p>consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules applying to RSPO supply chain certified members. The guidance document for audits is available on www.rspo.org.</p> | Not applicable. | |
| 5.12. Complaints | | | |
| 5.12.1 | <p>The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.</p> | <p>In the case of any complaint, the mill provided procedure AA-GL-5.08-R1 related to information request from any stakeholders to resolving stakeholder complaints. Based on document review, there was no complaint from stakeholder related to RSPO Supply Chain in PT. Inti Indosawit Subur – Tungkul Ulu POM. During this 12 months period (up to ASA1_2), there has been no complaint related RSPO Supply Chain Certification requirements.</p> | Yes |
| 5.13. Management Review | | | |
| 5.13.1 | <p>The organization is required to hold management reviews annually at planned intervals, appropriate to the scale and nature of the activities undertaken.</p> | <p>PT. Inti Indosawit Subur – Tungkul Ulu POM has Standard Operating Procedures for Internal Audit and Management Review (AA-SOP-ES-6001-R1). The management review planned once a year at minimum, or</p> | No |

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| | | <p>incidentally considering the critical area. The latest management review conducted 20 December 2017 attended by all key personnel.</p> <p>The Standard Operating Procedures of Traceability (AA-MPM-OP-1400.17.R6) dated 1 September 2017 has also regulates the internal audit by Sustainability Internal Audit Manager, that planned 2 times in a year at minimum.</p> | |
| 5.13.2 | <p>The input to management review shall include information on:</p> <ul style="list-style-type: none"> • Results of internal audits covering RSPO Supply Chain Certification Standard. • Customer feedback. • Status of preventive and corrective actions. • Follow-up actions from management reviews. • Changes that could affect the management system. • Recommendations for improvement. | <p>The latest management review of PT. Inti Indosawit Subur – Tungkal Ulu POM carried out on 4 March 2019 attended by 13 personnel. The organization shows issues discussed during management review dated 4 March 2019. Minute of management review meeting and attendance list were available. The management review inputs include information as follow:</p> <ul style="list-style-type: none"> - Result of audits: internal audit RSPO SCCS; - Customer feedback: Company have prepared logbook, but no feedback from customer; - Status of corrective and preventive action: no NC from latest internal audit RSPO SCCS; - Follow up action from previous management review: to have management review 2 times per year. - Process performance and product conformity: Follow up from Visit Engineering on 10 items; - Changes that could affect the management system and Recommendation for improvement: suggestion to revise some of the RSPO SCCS procedure. | Yes |
| 5.13.3 | <p>The output from the management review shall include any decisions and actions related to:</p> <ul style="list-style-type: none"> • Improvement of the effectiveness of the management system and its processes. • Resource needs. | <p>PT. Inti Indosawit Subur – Tungkal Ulu POM has conducted management review dated 4 March 2019. The management review output indicates decision and actions related to:</p> <ul style="list-style-type: none"> - Improvement of the effectiveness of management system and its process: regular evaluation aligned with management review, to minimize findings related to RSPO SCCS. | Yes |

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| | - Resource needed: to appoint PIC responsible for RSPO SCCS. | |
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Appendix E: CPO Mill Supply Chain Assessment Report (Module E - CPO Mills: Mass Balance)

| E.1 Definition | | | |
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| | Requirement | Evidence For any N/A raised, justification is required. | Compliance (Yes / No or N/A) |
| E.1.1 | Certification for CPO mills is necessary to verify the volumes of certified and uncertified FFB entering the mill and sales volume of RSPO certified products. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB. | PT. Inti Indosawit Subur – Tungkal Ulu POM holds current RSPO P&C Certificate No. RSPO 594422. In the current certificate, PT. Inti Indosawit Subur – Tungkal Ulu POM uses Mass Balance supply chain model. The mill only claimed the FFB proportion from certified supply bases which comprise of company-own estate (Tungkal Ulu Estate) and Scheme Smallholder (Tungkal Ulu Plasma). The other supply base, were come from third party suppliers as non-certified FFB source. | Yes |
| E.2 Explanation | | | |
| E.2.1 | The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill must be recorded by the CB in the public summary of the P&C certification report. For an independent mill, the estimated tonnage of CPO and PK products must be recorded in the RSPO IT platform, supply chain certificate and public summary audit report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report. | The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill have been recorded by the BSI in the public summary of the P&C certification report. For period July 2018 – June 2019: FFB: 166,536 MT CPO: 37,877 MT OER: 22.74% PK: 8,910 MT KER: 5.35% | Yes |

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| E.2.2 | The mill must also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform). | PT. Inti Indosawit Subur – Tungkal Ulu POM has met registration and reporting requirement as it has been registered in RSPO IT Platform (PalmTrace) with ID number RSPO_PO1000000345. | Yes |
| E.3 Documented procedures | | | |
| E.3.1 | <p>The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following:</p> <p>a. Complete and up to date procedures covering the implementation of all the elements in these requirements;</p> | <p>PT. Inti Indosawit Subur – Tungkal Ulu POM can demonstrate procedures as follow:</p> <ul style="list-style-type: none"> • Standard Operating Procedures – Traceability (AA-MPM-OP-1400.17.R6) dated 1 September 2017. The procedures cover traceability of CPO and PK, since FFB receiving from Tungkal Ulu Estate and Smallholder, processing up to shipping of CPO and PK as well as daily production report. The procedure also regulates the internal audit by Sustainability Internal Audit Manager. Traceability records are to be kept for 10 years. • Standard Operating Procedure – Book Keeping (AA-MPM-OP-1400.18-R4). The procedure explains method to check only certified product received. The book keeping mass balance stated every 3 months: January-March, April-June, July-September, and October-December each year. Head of Environment and Sustainability will inform to Certification Body in the case of projected overproduction. • SOP for mill operation Mill Policy Manual: <ul style="list-style-type: none"> - SOP AA-MPM-OP-1400.02.R2 Stasiun Penerimaan for FFB receiving station; - SOP AA-SOP-OP-101.5-R0 Grading; - SOP AA-MPM-OP-1400.03.R1 Stasiun Rebusan for sterilizer; - SOP AA-MPM-OP-1400.04.R1 Stasiun Pemisahan Berondolan for loose fruit separation; - SOP AA-MPM-OP-1400.05-R1 Stasiun Pengadukan dan Pengempaan for pressing station; - SOP AA-MPM-OP-1400.06-R1 Stasiun Pemurnian for clarification; - SOP AA-MPM-OP-1400.07-R1 Stasiun Pemisahan Nut dan Fiber for nut and fiber separation; | Yes |

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| | | <ul style="list-style-type: none"> - SOP AA-MPM-OP-1400.08-R1 Stasiun Kernel for kernel station; - SOP AA-MPM-OP-1400.09-R1 Stasiun Boiler; - SOP AA-MPM-OP-1400.10-R1 Stasiun Engine Room; - SOP AA-MPM-OP-1400.11-R1 Stasiun Water Treatment; - SOP AA-MPM-OP-1400.12-R1 Laboratorium; - SOP AA-MPM-OP-1400.13-R1 Stasiun Pengelolaan Limbah for palm oil mill effluent treatment; - SOP AA-MPM-OP-1400.14-R2 Stasiun Penimbunan dan Pengiriman CPO dan Kernel for CPO and PK bulking and despatch operation; - SOP AA-MPM-OP-1400.15-R1 Perawatan for preventive maintenance; - SOP AA-MPM-OP-1400.18-R4 Book Keeping; - AA-MPM-OP-1400.17-R6 Traceability. | |
| | b. The name 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 site procedures for the implementation of this standard. | As per Procedure of Traceability (AA-MPM-OP-1400.17-R6), the responsible person in charge to the supply chain system is Mill Manager. Mr. Tatar Simanjuntak is the Tungkal Ulu POM manager. During audit, the mill manager is able to demonstrate sufficient knowledge and understanding on RSPO supply chain implementation for palm oil mill. | Yes |
| E.3.2 | The site shall have documented procedures for receiving and processing certifies an non-certified FFBs. | The Mill has had documented procedures for receiving and processing of Certified and Non-certified FFBs in form of SOP AA-MPM-OP-1400.17-R6 "Traceability" and SOP for FFB Receiving Station (AA-MPM-OP-1400.02-R2). The Mill uses RSPO Supply Chain model Mass Balance, therefore does not required to separated receiving and processing of certified and non-certified FFB. | Yes |
| E.4 Purchasing and goods in | | | |
| E.4.1 | The site shall verify and document the volumes of certified and non-certified FFBs received. | PT Inti Indosawit Subur – Tungkal Ulu POM has demonstrated SOP of Traceability (AA-MPM-OP-1400.7.R6), chapter 5.1 indicates the Weighbridge Clerk has responsibility to input data and print weighbridge card based on "Surat Pengantar TBS", covering information e.g. estate name and block number, mill name, date of delivery, product description | Yes |

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|--|--|--|--|
| | | <p>and quantity, RSPO certificate number, transporter identity and unique identification number.</p> <p>PT. Inti Indosawit Subur – Tungkal Ulu POM receive FFB from certified and non-certified source. Certified source consist of own estate (Tungkal Ulu Estate) and Scheme Smallholder (Tungkal Ulu Plasma). Non-certified FFB sourced from third party supplier, e.g.: YES, KSP, HD, KUD Bina Usaha SP1, Victory, Teguh Prayoga, Jaya Mandiri, Merlung Topaz, MH, Gapoktan Maju Jaya, Penyabungan Topaz, Gapoktan Usaha Berkat, Asosiasi Tani Bersama and Novie Zulhi.</p> <p>Document "Surat Pengantar TBS" (FFB Delivery Note) and Kartu Timbangan (Weighbridge Card) described identity and location of FFB source and other item required e.g.</p> <p>Certified FFB:</p> <ul style="list-style-type: none"> - FFB delivery "Surat Pengantar TBS Tungkal Ulu Estate No.009154" from Division III, block C91A dated 10 May 2019 – total 200 bunches. Weighbridge ticket "Tiket Timbangan No.PTUA119203619" dated 10 May 2019, for 200 FFB bunches; nett weight 5,700 kg; from Tungkal Ulu Estate, Division III, block C91a; vehicle BH6580MF; RSPO certificate No.RSPO594422. - FFB delivery "Surat Pengantar TBS Tungkal Ulu Estate No.007021" from Division I, with FFB: 512 bunches from block A16g and 576 bunches from A16a; dated 10 May 2019 – total 1088 bunches. Weighbridge ticket "Tiket Timbangan No.PTUA119203632" dated 10 May 2019, for 1,088 FFB bunches; nett weight 2,625 kg; from Tungkal Ulu Estate, Division I, block A16a and A16g; vehicle BH6149MF; RSPO certificate No.RSPO594422. - FFB delivery note: "Surat Pengantar TBS KUD Bina Usaha, Hampanan 12 Sawitri Makmur No.0400", dated 16 February 2019. Vehicle code BE9021TA, driver Eko, carrying 250 bunches. Weighbridge ticket "Tiket Timbangan No.PTUA219101070" dated 16 February 2019, or 250 FFB | |
|--|--|--|--|

| | | | |
|---------------------------|--|---|-----|
| | | <p>bunches, nett weight 7,319 kg, FFB source from KUD Bina Usaha, farmer group Sawitri Makmur, vehicle BE9021TA, RSPO certificate No.RSPO594422.</p> <ul style="list-style-type: none"> - FFB delivery note: "Surat Pengantar TBS KUD Sawit Kita, Hampanan 11 Rajawali No.0357", dated 16 April 2019. Vehicle code BH8589MK, driver Andi, carrying 300 bunches. Weighbridge ticket "Tiket Timbangan No.PTUA219202221" dated 16 April 2019, or 300 FFB bunches, nett weight 6,455 kg, FFB source from KUD Sawit Kita, farmer group Rajawali, vehicle BH6583MK, RSPO certificate No.RSPO594422. <p>Non-certified FFB:</p> <ul style="list-style-type: none"> - FFB delivery note: "Surat Pengantar TBS HD", dated 10 May 2019. Vehicle code BH8078MF; driver hairul; carrying 500 bunches. Weighbridge ticket "Tiket Timbangan No.PTUA519204083" dated 10 May 2019, for 500 FFB bunches; nett weight 9,667 kg; FFB source from non-certified third party FFB supplier HD; vehicle BH8018MF. - FFB delivery note: "Surat Pengantar TBS Makmur Mandiri", dated 10 May 2019. Vehicle code BH8169EI; driver Gono; carrying 300 bunches. Weighbridge ticket "Tiket Timbangan No.PTUA519204099" dated 10 May 2019, for 300 bunches; nett weight 7,078 kg; FFB source from non-certified third party FFB supplier Makmur Mandiri; vehicle BH8169EI. | |
| E.4.2 | The site shall inform the CB immediately if there is a projected overproduction of certified tonnage. | Head of Environment and sustainability will inform to Certification Body in the case of projected overproduction. During this period of annual surveillance audit, there is no overproduction happened. | Yes |
| E.5 Record keeping | | | |
| E.5.1 | a. The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis by RSPO. | PT. Inti Indosawit Subur – Tungkal Ulu POM maintain book keeping on 3-monthly basis. Standard Operating Procedure – Book Keeping (AA-MPM-OP-1400.18-R4). The procedure explains method to check only certified product received. The book keeping mass balance stated every 3 months: January-March, April-June, July-September, and October-December each year. | Yes |

| | | | |
|--|--|--|-----|
| | | | |
| | b. All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated | Conversion rate is only applied to provide reliable estimation of CPO and PK produced for annual budget. The management of PT. Inti Indosawit Subur – Tungkal Ulu POM has mechanism and knowledge that all volumes of CPO and PK delivered are deducted from the material accounting system. | Yes |
| | c. The site can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a site is allowed to sell short. (i.e. product can be sold before it is in stock.) For further details refer to Module C. | PT. Inti Indosawit Subur – Tungkal Ulu POM only deliver certified CPO and PK sales from a positive stock. The volume of certified CPO and PK are deducted on three-monthly basis. Audit team verified there was no shortselling and/or negative stock more than three-monthly period. | Yes |

Supply Chain Declaration

| A. Monthly Records of Certified and Uncertified FFB Received since the last audit | | | | |
|--|---------------------|---|---|-----------------------------|
| No. | Month - Year | Volume of FFB from certified supply bases (mt) | Volume of FFB from uncertified supply bases (mt) | Total FFB/Month (mt) |
| 1. | July 2018 | 19,837.19 | 11,740.96 | 31,578.14 |
| 2. | August 2018 | 17,836.20 | 13,290.28 | 31,126.49 |
| 3. | September 2018 | 19,700.23 | 12,024.89 | 31,725.12 |
| 4. | October 2018 | 18,791.21 | 11,942.06 | 30,733.26 |
| 5. | November 2018 | 17,904.27 | 10,215.52 | 28,119.79 |
| 6. | December 2018 | 14,388.75 | 11,496.41 | 25,885.16 |
| 7. | January 2019 | 11,741.06 | 9,939.35 | 21,680.41 |
| 8. | February 2019 | 9,827.30 | 7,105.39 | 16,932.68 |
| 9. | March 2019 | 9,868.88 | 7,178.40 | 17,047.28 |
| 10. | April 2019 | 9,674.36 | 7,268.74 | 16,943.10 |
| Total | | 149,569.45 | 102,202.00 | 251,771.43 |
| Note: | | | | |

| B. Monthly Records of Certified CPO & PK since the last audit | | | |
|--|---------------------|---------------------------|--------------------------|
| No. | Month - Year | Certified CPO (mt) | Certified PK (mt) |
| 1. | July 2018 | 4,235.36 | 1,054.84 |
| 2. | August 2018 | 3,832.37 | 889.86 |
| 3. | September 2018 | 4,119.25 | 963.70 |
| 4. | October 2018 | 3,994.31 | 1,010.47 |
| 5. | November 2018 | 3,666.56 | 1,005.61 |
| 6. | December 2018 | 3,131.42 | 824.60 |
| 7. | January 2019 | 2,508.05 | 648.40 |
| 8. | February 2019 | 2,082.01 | 538.72 |
| 9. | March 2019 | 2,069.55 | 535.84 |
| 10. | April 2019 | 2,007.57 | 505.54 |
| Total | | 31,646.45 | 7,977.58 |
| Note: | | | |

| C. Records of Certified CPO & PK Sold under PalmTrace to Buyers since the last audit (if any) | | | | |
|--|--|---|--------------------------------|-------------------------------|
| No. | Buyers Name | Palmtrace Trading License Number | Certified CPO Sold (mt) | Certified PK Sold (mt) |
| 1. | PT. Sari Dumai Sejati | TR-605ed186-eb94 | 5.26 | - |
| 2. | Kuala Lumpur Kepong Berhad/CLK Oleo | TR-569811a9-1483 | 334.47 | - |
| 3. | PT. Sari Dumai Sejati | TR-72685e91-9a59 | 826.6 | - |
| 4. | PT. Inti Indosawit Subur – Tungkal Ulu KCP | TR-ff06cdca-1728 | - | 581.83 |
| 5. | PT. Inti Indosawit Subur – Tungkal Ulu KCP | TR-4f1f1cdb-e75f | - | 487.16 |
| 6. | PT. Inti Indosawit Subur – Tungkal Ulu KCP | TR-779d93de-a8d1 | - | 1,063.6 |
| 7. | PT. Inti Indosawit Subur – Tungkal Ulu KCP | TR-3a70adb9-c750 | - | 50.77 |

| | | | | |
|--------------|--|------------------|-----------------|-----------------|
| 8. | Kuala Lumpur Kepong Berhad/KLK Oleo | TR-e3d4807f-d4b8 | 469.88 | - |
| 9. | PT. Sari Dumai Sejati | TR-9f61b752-bbab | 745.07 | - |
| 10. | Kuala Lumpur Kepong Berhad/KLK Oleo | TR-83ee490d-dea5 | 600.17 | - |
| 11. | PT. Sari Dumai Sejati | TR-ef17861f-3417 | 351.96 | - |
| 12. | PT. Inti Indosawit Subur – Tungkal Ulu KCP | TR-fe11204a-02a2 | - | 679.40 |
| 13. | PT. Inti Indosawit Subur – Tungkal Ulu KCP | TR-29ea8a89-0158 | - | 538.18 |
| 14. | PT. Inti Indosawit Subur – Tungkal Ulu KCP | TR-081ac52c-e002 | - | 1,041.60 |
| 15. | PT. Inti Indosawit Subur – Tungkal Ulu KCP | TR-5a696d57-b896 | - | 492.18 |
| 16. | PT. Dasa Anugrah Sejati – Taman Raja KCP | TR-2c0aacdc-c220 | - | 148.79 |
| 17. | PT. Dasa Anugrah Sejati – Taman Raja KCP | TR-48bad4dd-d197 | - | 14.39 |
| 18. | PT. Sari Dumai Sejati | TR-ecee54dc-a7d8 | 10.53 | - |
| 19. | PT. Sari Dumai Sejati | TR-23c68323-4c9a | 65.79 | - |
| 20. | PT. Sari Dumai Sejati | TR-b913f964-473b | 54.37 | - |
| 21. | Frigorifico Allana Private Limited | TR-b280121e-babc | 295.37 | - |
| 22. | PT. Inti Indosawit Subur – Tungkal Ulu KCP | TR-32b902ea-aa2b | - | 768.08 |
| 23. | PT. Inti Indosawit Subur – Tungkal Ulu KCP | TR-0b57ce50-f748 | - | 996.97 |
| 24. | PT. Inti Indosawit Subur – Tungkal Ulu KCP | TR-7f2006c4-15ad | - | 440.21 |
| 25. | PT. Sari Dumai Sejati | TRd9eb5b1d-8dc9 | 315.73 | - |
| 26. | PT. Sari Dumai Sejati | TR-a1abe2bf-23f5 | 161.31 | - |
| Total | | | 4,236.51 | 7,303.16 |
| Note: | | | | |

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

| No. | Buyers Name | Scheme Name | CPO Sold (mt) | PK Sold (mt) |
|--------------|-------------|-------------|---------------|--------------|
| 1 | Classified | ISCC | 26,725.18 | 0 |
| Note: | | | | |

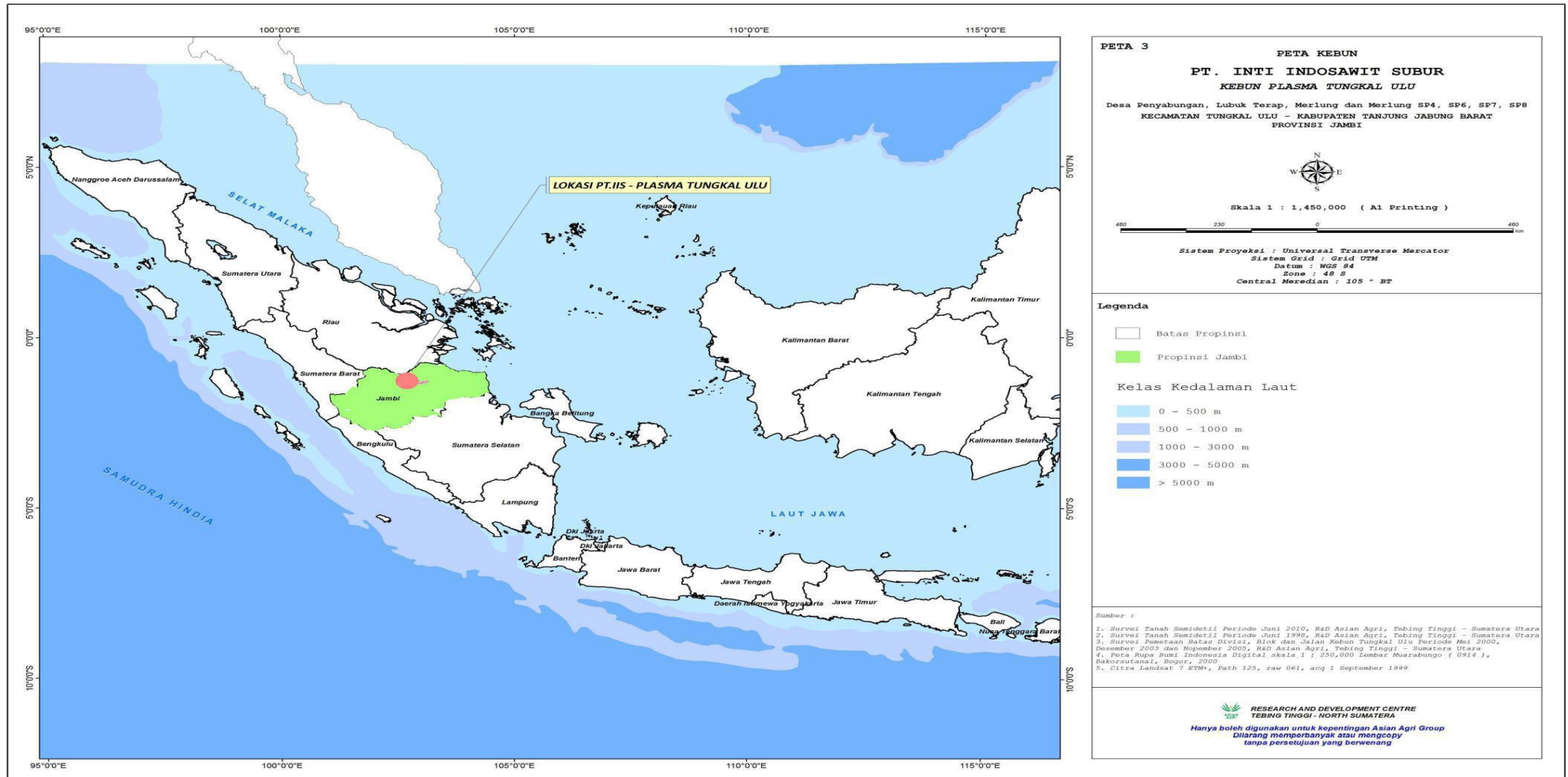
E. Records of CPO & PK Sold as conventional to Buyers since the last audit (if any)

| No. | Buyers Name | CPO Sold (mt) | PK Sold (mt) |
|--------------|-------------|---------------|--------------|
| | - | 0 | 0 |
| Note: | | | |

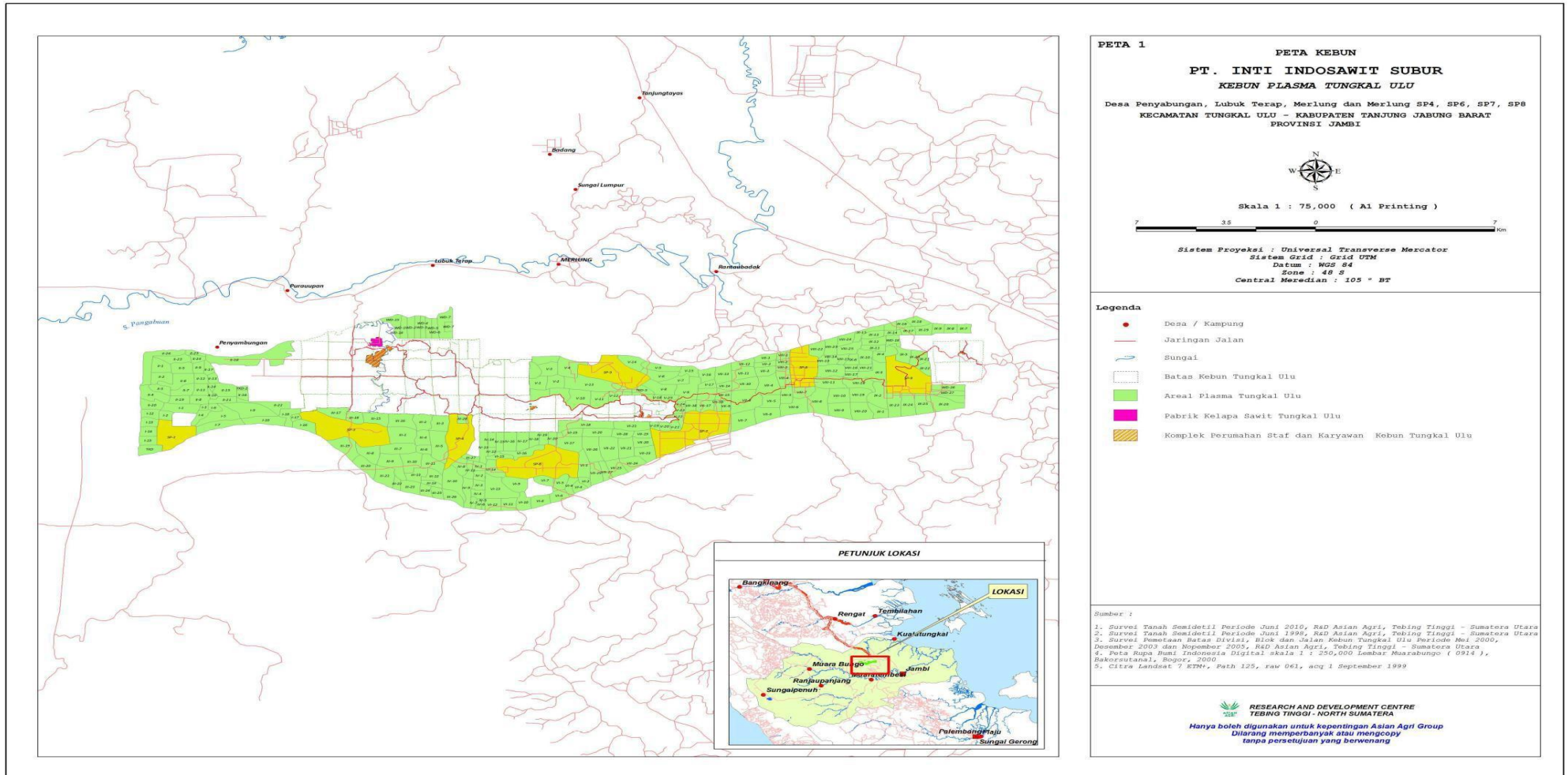
F. Records of Certified CPO Sold under RSPO Credits to Buyers since the last audit (if any)

| No. | Buyers Name | PalmTrace Trading License Number | RSPO Credits of Certified CPO Sold (mt) |
|--------------|-------------|----------------------------------|---|
| | - | 0 | 0 |
| Note: | | | |

Appendix F: Location Map of Certification Unit and Supply bases



Appendix G: Estate Field Map



Appendix H: List of Smallholder Sampled

SP 1 - KUD BINA USAHA

| No. | Name of Registered Smallholder (as per Land Title) | | Smallholder Plot Number |
|-----|--|----------------------|-------------------------|
| | Old | New | |
| 1 | SUGIYANTO | PARJIEM | 2376 |
| 2 | S. ALS REYBAN/SUHARTOYO | SUHARTOYO | 2360 |
| 3 | M.TAMRIN | ROSDIANA | 2358 |
| 4 | BURHANUDIN SARUMPAET | BURHANUDIN SARUMPAET | 2363 |
| 5 | MAT RAI | ISWANTO | 2430 |
| 6 | KATIM | MUJIO | 2431 |
| 7 | SUKARNEN | ISENEN | 2435 |
| 8 | ASWARDI | SAMSUDIN | 2447 |
| 9 | SULARSO WARDOYO | HARIYADI | 2484 |
| 10 | MARWAN LOWER | SAYRU / ROSDIANA | 2487 |
| 11 | KARSITA | FAUZI | 2460 |
| 12 | CARMIN | ISRONI | 2442 |
| 13 | SARCA | ADNAN | 2540 |
| 14 | SUNARDI | SUNARDI | 2542 |
| 15 | MAT KARDI | SUMARNO | 2553 |
| 16 | MUH. EDI.S | BUSRI | 2554 |
| 17 | DARMI | SARSIH | 2626 |
| 18 | SULAIMAN | SULAIMAN | 2625 |
| 19 | KHAIRONI | BAMBANG PRIYONO | 2611 |
| 20 | IMAM. S | TUMIRAH | 2343 |

SP 6 – KOPERASI MANUGGAL JAYA

| No. | Name of Registered Smallholder (as per Land Title) | | Smallholder Plot Number |
|-----|--|----------------------|-------------------------|
| | Old | New | |
| 1 | PAIMIN | SUBANDI. 1 | 1898 |
| 2 | CHENDI DESTRIAN | SULARNO | 1840 |
| 3 | MARSONO | MARSONO | 1932 |
| 4 | SUNARYO | SUNARYO | 1904 |
| 5 | KALAM | KALAM | 1858 |
| 6 | JOHANES R. SUPRIYADI | JOHANES R. SUPRIYADI | 2143 |
| 7 | MUHTAR | MUHTAR | 2216 |
| 8 | TUMIN | TUMIN | 2218 |
| 9 | BERAT ALYANTO | BERAT ALYANTO | 2210 |
| 10 | PARMAN | PARMAN | 2199 |
| 11 | KASMIN | KASMIN | 2165 |
| 12 | SUID | SUID | 2169 |
| 13 | RUBIYO | RUBIYO | 2129 |
| 14 | SUMADI | SUBALI | 2145 |

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| | | | |
|----|------------|---------------|------|
| 15 | JUREMI | HADI PRIYATNO | 2156 |
| 16 | WAHYUDI | SUTARNO | 2212 |
| 17 | SAPON | SUMALI | 2184 |
| 18 | SUHARDIMAN | SLAMET | 2213 |

SP 8 - KUD ARGO MAKMUR

| No. | Name of Registered Smallholder (as per Land Title) | | Smallholder Plot Number |
|-----|--|----------------|-------------------------|
| | Old | New | |
| 1 | HASIM | SARMO | 4223 |
| 2 | HADI | HADI | 4274 |
| 3 | MARIDUN | SANTURI | 4275 |
| 4 | LASHARDI | JIMI MARTONO | 4222 |
| 5 | AMIRJAN | MAKMUR | 3957 |
| 6 | AHMAD KARIM | TUKIMIN | 3953 |
| 7 | A. SETIAWAN | MATNI | 4040 |
| 8 | BUSTAMAR | KAMSINAH | 4039 |
| 9 | TUGIN | TONGIN | 4197 |
| 10 | SYAFRIAL.S | KASIMAN | 4238 |
| 11 | SUPRAYOGI | SUPRAYOGI | 4199 |
| 12 | SUMADI | SUMADI | 4239 |
| 13 | ZUKIPLI | BASORI | 4908 |
| 14 | WAHYUDI | SULINO | 4971 |
| 15 | WAHYU SUDRAJAT | WAHYU SUDRAJAT | 4943 |
| 16 | SYAFRI HUSIN | A. DULHAMID | 4938 |
| 17 | SUKIMAN | SURIPTO | 4901 |
| 18 | SARIMAN | SARIMAN | 4919 |
| 19 | SAMSI | SAMSI | 4885 |
| 20 | SAMIJAN | SUWARSONO | 4884 |

SP 9 - KUD HARAPAN JAYA

| No. | Name of Registered Smallholder (as per Land Title) | | Smallholder Plot Number |
|-----|--|----------------------|-------------------------|
| | Old | New | |
| 1 | ISKANDAR | SOHIR | 4134 |
| 2 | SUMARYONO | SUMARYONO | 4184 |
| 3 | TARMUJI | H. TARYO | 4190 |
| 4 | SUKRIYONO | SUKRIYONO | 4193 |
| 5 | PRIYONO | KARMANTO | 4699 |
| 6 | KAMSIDI | KASMIDI | 4708 |
| 7 | SUWADI | SITI MASNIAH | 4798 |
| 8 | JUWARI | ASUP SUTAJI | 4701 |
| 9 | REPASONER | ZAINUL ARIFIN SITEPU | 4490 |
| 10 | SUKARMO | H. MARWOTO | 4485 |
| 11 | TURMU .I. | PAJAR IKA NURHIDAYAT | 4831 |

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|----|------------|----------------------|------|
| 12 | ZAKARIA. M | WAHMAN | 4830 |
| 13 | NGUMPII | SUMARJIANTO | 4687 |
| 14 | NYAMAN | PAJAR IKA NURHIDAYAT | 4686 |
| 15 | SAGILAN | SAGILAN | 4705 |
| 16 | TUGIMAN | MUALIMIN | 4859 |
| 17 | SUMEDI | PONIMAN | 4403 |
| 18 | MUJIONO | MUJIONO | 4470 |
| 19 | A.LATIF | SUBAKHIR | 4412 |
| 20 | MUGIYAR | MUGIYAR | 4408 |

Appendix I: List of Abbreviations

| | |
|------------|--|
| a.i | Active Ingredient |
| BOD | Biochemical Oxygen Demand |
| CB | Certification Bodies |
| CHRA | Chemical Health Risk Assessment |
| COD | Chemical Oxygen Demand |
| CPO | Crude Palm Oil |
| CSPO | Certified Sustainable Palm Oil |
| CSPKO | Certified Sustainable Palm Kernel Oil |
| EFB | Empty Fruit Bunch |
| EHS | Environmental, Health and Safety |
| EIA | Environmental Impact Assessment |
| EMS | Environmental Management System |
| FFB | Fresh Fruit Bunch |
| FPIC | Free, Prior, Informed and Consent |
| GAP | Good Agricultural Practice |
| GHG | Greenhouse Gas |
| GMP | Good Manufacturing Practice |
| GPS | Global Positioning System |
| HCV | High Conservation Value |
| IPM | Integrated Pest Management |
| IP | Identity Preserved |
| IS - CSPO | Independent Smallholder Certified Sustainable Palm Oil |
| IS – CSPKO | Independent Smallholder Certified Sustainable Palm Kernel Oil |
| IS – CSPKE | Independent Smallholder Certified Sustainable Palm Kernel Expeller |
| ISCC | International Sustainable Carbon Certification |
| LD50 | Lethal Dose for 50 sample |
| MB | Mass Balance |
| MSDS | Material Safety Data Sheet |
| MT | Metric Tonnes |
| OER | Oil Extraction Rate |
| OSH | Occupational Safety and Health |
| PK | Palm Kernel |
| PKO | Palm Kernel Oil |
| POM | Palm Oil Mill |
| POME | Palm Oil Mill Effluent |
| PPE | Personal Protective Equipment |
| RSPO | Roundtable on Sustainable Palm Oil |
| P&C | Principles & Criteria |
| RTE | Rare, Threatened or Endangered species |
| SCCS | Supply Chain Certification Standard |
| SEIA | Social & Environmental Impact Assessment |
| SIA | Social Impact Assessment |
| SOP | Standard Operating Procedure |