

**RSPO PRINCIPLE AND CRITERIA –  
RECERTIFICATION ASSESSMENT 2 (RC2)  
Public Summary Report**

**Client Company name (Parent Company):  
SIPEF GROUP**

Client company Address:  
Forum Nine Building, 10<sup>th</sup> Floor, Suite 1-11  
Jl.Imam Bonjol No.9 Medan – 20112  
Sumatera Utara Province  
Indonesia

Certification Unit:  
**PT Tolan Tiga Indonesia – Perlabian Palm Oil Mill**

Location of Certification Unit:  
Perkebunan Perlabian Village, Kampung Rakyat District,  
Labuhanbatu Selatan Regency,  
Sumatera Utara Province - 21463  
Indonesia

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## Section 1: Scope of the Certification Assessment

1. Company Details			
<b>RSPO Membership Number</b>	1-0021-05-000-00	<b>Membership Approval Date</b>	7 <sup>th</sup> December 2005
<b>Parent Company Name</b>	SIPEF Group		
<b>Address</b>	Head Office: Forum Nine Building, 10th Floor, Suite 1-11 Jl.Imam Bonjol No.9 Medan – 20112 Sumatera Utara Province Indonesia		
<b>Subsidiary (Certification Unit Name)</b>	PT. Tolan Tiga Indonesia – Perlabian POM		
<b>Address</b>	Site address: Perkebunan Perlabian Village, Kampung Rakyat District, Labuhanbatu Selatan Regency, Sumatera Utara Province – 21463 Indonesia		
<b>Contact Name</b>	Mr. Sander Van Den Ende		
<b>Website</b>	www.tolantiga.co.id	<b>E-mail</b>	svdende@sipef.com
<b>Telephone</b>	061 - 41060020	<b>Facsimile</b>	+62 61 452 0908

2. Certification Information			
<b>Certificate Number</b>	<b>RSPO 555208</b>	<b>Date of First Certification</b>	17 May 2010
		<b>Certificate Start Date</b>	17 May 2020
		<b>Certificate Expiry Date</b>	16 May 2025
<b>Scope of Certification</b>	Production of CPO and PK at Perlabian POM with 2 estates as supply base, namely Perlabian Estate and Tolan Estate; with Marketing Activities through SIPEF N.V. Mill capacity of Bukit Maradja POM is 60 MT FFB/hour.		
<b>Applicable Standards</b>	RSPO P&C November 2018; Supply Chain Model: Identity Preserved		

3. Other Certifications			
<b>Certificate Number</b>	<b>Standard(s)</b>	<b>Certificate Issued by</b>	<b>Expiry Date</b>
EU-ISCC-Cert-US201-70600642	ISCC EU	CSC Global Services	03 December 2020
BSI-ISPO611404	ISPO	BSI Services Sdn Bhd	18 July 2021
10219730	ISO 9001 : 2015	PT. LIoyd's Register Indonesia	02 July 2021

4. Location(s) of Mill & Supply Bases			
<b>Name (Mill / Supply Base)</b>	<b>Location [Map Reference #]</b>	<b>GPS Coordinates</b>	
		<b>Latitude</b>	<b>Longitude</b>
Perlabian POM	Perkebunan Perlabian Village, Kampung Rakyat District, Labuhan Batu Selatan Regency, Sumatera Utara Province, Indonesia	2° 3' 40.98" N	100° 4' 57.19" E

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Perlavian Estate	Perkebunan Perlavian Village, Kampung Rakyat District, Labuhan Batu Selatan Regency, Sumatera Utara Province	2° 3' 37.60" N	100° 4' 52.40" E
Tolan Estate	Perkebunan Perlavian Village, Kampung Rakyat District, Labuhanbatu Regency, Sumatera Utara Province, Indonesia	2° 0' 11.78" N	100° 2' 30.66" E

### 5. Description of Supply Base

Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Perlavian Estate	4,476.33	59.38	271.31	4,807.02	94.12
Tolan Estate	3,614.15	55.99	1.90	3672.04	98.42
<b>Total</b>	<b>8,090.48</b>	<b>115.37</b>	<b>273.21</b>	<b>8,479.06</b>	<b>95.41</b>

### 6. Plantings & Cycle

Estate	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Perlavian Estate	519.22	2,057.55	1,027.83	871.73	0	3,957.11	519.22
Tolan Estate	0	388.99	2,543.35	681.81	0	3,614.15	0
<b>Total (ha)</b>	<b>519.22</b>	<b>2,446.54</b>	<b>3,571.18</b>	<b>1,553.54</b>	<b>0</b>	<b>7,571.26</b>	<b>519.22</b>

**Note:**

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

Estate	Tonnage / year			Forecast (May 2020 – April 2021)
	Estimated (May 2019 – April 2020)	Actual (March 2019 – February 2020)		
		Previous license period (March – April 2019)	Current license period (May 2019 – Feb 2020)	
Perlavian Estate	109,781	16,693.20	86,528.35	106,841.55
Tolan Estate	110,606	17,849.98	92,524.52	99,223.19
<b>Total</b>	<b>220,387</b>	<b>213,596.05</b>		<b>206,064.74</b>

**Note:**  
Last Audit: March 2019

### 8. Certified Tonnage of FFB (from other certified unit(s)) if applicable \*

Estate	Tonnage / year			Forecast (May 2020 – April 2021)
	Estimated (May 2019 – April 2020)	Actual (March 2019 – February 2020)		
		Previous license period (March – April 2019)	Current license period (May 2019 – Feb 2020)	
Nil	NA			NA
<b>Total</b>				

**Note:**  
Last Audit: March 2019

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9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable				
Independent FFB Supplier	Tonnage / year			
	Estimated (May 2019 – April 2020)	Actual (March 2019 – February 2020)		Forecast (May 2020 – April 2021)
	NA	Previous license period (March – April 2019)	Current license period (May 2019 – Feb 2020)	NA
<b>Nil</b>				
<b>Total</b>				

**Note:**  
Last Audit: March 2019

10. Certified Tonnage				
Mill Capacity: 60 MT/hr	Estimated (May 2019 – April 2020)	Actual (March 2019 – February 2020)		Forecast (May 2020 – April 2021)
	FFB	FFB	FFB	FFB
	220,387	Previous license period (Mar – April 2019)	Current license period (May 2019 – Feb 2020)	206,064.74
		34,543.18	179,052.87	
<b>SCC Model: IP/MB</b>	<b>CPO (OER: 23.50 %)</b>	<b>CPO (OER: 21.83%)</b>		<b>CPO (OER: 21.8%)</b>
	51,790.95		46,622.80	44,922.11
	<b>PK (KER: 5.70%)</b>	<b>PK (KER: 5.62%)</b>		<b>PK (KER: 5.5%)</b>
	12,562.06		12,003.25	11,333.56

**Note:**  
Last Audit: March 2019

11. Actual Sold Volume (CPO)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
<b>CPO (MT)</b>	-	37,957.12	-	1,505.08	39,462.20

12. Actual Sold Volume (PK)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
<b>PK (MT)</b>	10,165.85	-	-	1,263.36	11,429.21

13. Actual Group certification Claims		
	Credit	Physical Volume (MT)
<b>IS-CSPO</b>	Nil	Nil
<b>IS-CSPKO</b>	Nil	Nil
<b>IS-CSPKE</b>	Nil	Nil

## Section 2: Assessment Process

### Certification Body:

BSI Services Malaysia Sdn Bhd,  
(ASI Accreditation Number: ASI-ACC-067)  
Suite 29.01 Level 29, The Gardens North Tower,  
Mid Valley City, Lingkaran Syed Putra,  
59200 Kuala Lumpur, Malaysia.  
Tel +60 (3) 9212 9638 Fax +60 (3) 9212 9639  
Representative: Nicholas Cheong ([Nicholas.Cheong@bsigroup.com](mailto:Nicholas.Cheong@bsigroup.com))  
Website: [www.bsigroup.com](http://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 recertification assessment was conducted from 16-18 March 2020. The audit programme is included as Section 2.3. 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 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 & Criteria Generic November 2018 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.

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

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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 recertification 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 Re-certification assessment, the report was externally reviewed by RSPO approved Certification Reviewer prior to certification decision by BSI.

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

<b>Assessment Program</b>					
<b>Name (Mill / Supply Base)</b>	<b>Year 1 (Re-Certification)</b>	<b>Year 2 (ASA 2.1)</b>	<b>Year 3 (ASA 2.2)</b>	<b>Year 4 (ASA 2.3)</b>	<b>Year 5 (ASA 2.4)</b>
Perlabian POM	V	V	V	V	V
Perlabian Estate	V	V	V	V	V
Tolan Estate	V	V	V	V	V

**Tentative Date of Next Visit: March 1, 2021 - March 3, 2021**

**Total No. of Mandays: 12**

**2.2 BSI Assessment Team:**

<b>Team Member Name</b>	<b>Role</b> <i>(Team Leader or Team member)</i>	<b>Qualifications</b> <i>(Short description of the team members)</i>
Imam Fakhrurozi	Team Leader	Imam holds degree in Agriculture Technology and graduated from Gadjah Mada University, Yogyakarta on 2011. He had 2 (two) years working experience related to oil palm industry, as a sustainability and HSE officer in oil palm Plantation Company in Indonesia. Imam has completed a number of relevant trainings, the training includes ISO 9001:2008 and EMS 14001:2004 Lead Auditor, Lead Auditor of SMK3, RSPO P&C Lead auditor endorsed course. Currently he works for BSI Group based in



		Jakarta office. He is one of the BSI qualified RSPO auditor. He had been involved in RSPO auditing since 2015. During this assessment, he assessed on the aspects of Environmental aspect-impacts, Occupational Health and Safety.
Eko Purwanto	Team Member	Holds a Bachelor of Forestry from Forest Conservation Department, Faculty of Forestry, Bogor Institute of Agriculture (IPB) in 2001. He has working experience at Oil Palm Plantation in East Kalimantan since 2003 to 2012, the last position was Estate Manager. He has implementing good agricultural practice including integrated pest management and limited pesticides uses. He has completed lead auditor training courses for RSPO P&C (2013), RSPO SCC (2012), ISPO (2012), LAC ISO 9001 (2012), ISO 14001 (2013) and ISO 45001 (2019). Refreshment training have been completed for RSPO P&C in May 2018, RSPO SCC in March 2018. He has been involved in quality (ISO 9001) management system audits for very broad industrial and involved in RSPO and ISPO audit for several plantations and mills since October 2012. During this assessment, he assessed on the aspects of best management practice in palm oil mill and estate, supply chain for palm oil mill.
Yudwi Wisnu Rahmanto	Team Member	Bachelor of Forestry with Silviculture background. He worked at professional independent Certification Body as an Auditor for last 8 years and has involved in auditing activities with various certification schemes. Selected training which have been followed, such as RSPO Endorsed Lead Auditor Training Course, RSPO NEXT, ISPO Auditor/Lead Auditor Course, Quality Management System (QMS) ISO 9001:2008 Auditor/Lead Auditor Course, GIS-Basic Mapping and Spatial Analysis, Timber Legality Assurance System (SVLK), Verification Organization Training C.A.F.E Practices (Starbucks), UTZ Programme and others internal training programs. He has involved in auditing activities, such as Sustainable Forest Management by FSC FM/COC Scheme, Sustainable Palm Oil by RSPO and ISPO Scheme, Coffee And Farmer Equity (C.A.F.E Practices) Starbucks, Organic Standard (EU, NOP, JAS) for Coffee Farmers and Organic Exchange for Textile. During this assessment, he assessed on the aspects of Legal, Social Aspect and HCV.
Andi Pratama Pasaribu	Team Member	Bachelor degree, majoring social economy. He has several of work experiences (more than 5 years) as the operational staff since 2008. He has been followed the Training of Lead Auditor Indonesian Sustainable Palm Oil (ISPO) which was held by ISPO Commission in 2013 and Training of Lead Auditor Roundtable on Sustainable Palm Oil (RSPO) by Proforest and Daemeter in 2016. He has been attended several kinds of training, such as High Conservation Value (HCV) Training, Lead Auditor ISO 9001:2008, Lead Auditor ISO 14001:2005, auditor OHSAS, lead auditor RSPO supply chain by BMTRADA etc. He has some experiences of Sustainability Palm Oil scheme audit in Indonesian and Malaysia in best management practices, land legality, environmental, social and worker welfare aspect and supply chain. During this audit, he conducted stakeholder consultation and verify legal/social aspect.

**Accompanying Persons: Nil**

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**2.3 Assessment Plan**

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

Date	Time	Subjects	IF	EP	YR	AP
			PRSP-EMS, OHS, SA, SCC	PRSP-LA, EMS, OHS, SA, SCC	PRSP-EMS, OHS, SA	PRSP-SA
Monday, 16/03/2020	08.00 – 09.00	<b>Opening Meeting</b> - Presentation by client (Overview of PT Tolan Tiga Indonesia – Perlabian POM and its supply base); - Presentation by BSI team (Objective, scope, audit plan, etc.)	√	√	√	√
	09.00-12.00	<b>Perlabian POM: RSPO Document Review</b> General information, Time bound plan, partial certification verification, RSPO P&C 2018 (for BMP and SCC)	-	√	-	-
		<b>Perlabian POM: RSPO Document Review:</b> RSPO P&C 2018 (for Legal, Social, Environment and OHS)	√	-	√	-
		<b>Perlabian POM:</b> Visit and interview with government offices in Labuhnbatu Selatan Regency	-	-	-	√
	12.00-14.00	<b>Break/Lunch</b>	√	√	√	√
	14.00-17.00	<b>Field Visit (Perlabian POM):</b> RSPO P&C 2018 (for BMP and SCC)	-	√	-	-
		<b>Field Visit (Perlabian POM):</b> Visit and observing Occupational Safety and Health management, Environmental management (including but not limited to: use of PPE, safe working environment, walk ways, signs, palm oil mill effluent, diesel tanks, fire extinguishers, emission, first aiders and boxes, etc),	√	-	√	-
<b>Stakeholder Consultation:</b> Visit to local communities (head of village, cooperatives, community leader, contractors, worker union, gender committee, etc.)		-	-	-	√	
Tuesday, 17/03/2020	08.00-12.00	<b>Field Visit (Tolan Estate):</b> Field observation and Worker interview – FFB harvesting, FFB loading, fertilizer application, IPM, road maintenance, water management, etc.	-	√	-	-
		<b>Field Visit (Tolan Estate):</b> Field observation and Worker interview - HCV's, boundaries, landfill (waste management), etc.	-	-	√	-
		<b>Field Visit (Tolan Estate):</b> Field observation and worker interview - herbicide application, chemical and fertilizer warehouse, hazardous waste storage, workshop, housing, social amenities, clinic, etc.	√	-	-	-

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Date	Time	Subjects	IF	EP	YR	AP
			PRSCO-EMS, OHS, SA, SCC	PRSCO-LA, EMS, OHS, SA, SCC	PRSCO-EMS, OHS, SA	PRSCO-SA
		<b>Field Visit (Tolan Estate) and Stakeholder Consultation:</b> Visit to local communities (head of village, cooperatives, community leader, contractors, worker union, gender committee, etc.).	-	-	-	√
	12.00-14.00	<b>Break/Lunch</b>	√	√	√	√
	14.00-17.00	<b>Tolan Estate: RSPO Document Review</b> RSPO P&C 2018 (for Best Agriculture Practices, Long Term Management Plan, Continual improvement, Legal, Social, Environment and OHS).	√	√	√	√
Wednesday, 18/03/2020	08.00-12.00	<b>Field Visit (Perlabian Estate):</b> Field observation and Worker interview – FFB harvesting, FFB loading, fertilizer application, IPM, road maintenance, water management, etc.	-	√	-	-
		<b>Field Visit (Perlabian Estate):</b> Field observation and Worker interview - HCV's, landfill (waste management), etc.	-	-	√	-
		<b>Field Visit (Perlabian Estate):</b> Field observation and worker interview - herbicide application, chemical and fertilizer warehouse, hazardous waste storage, workshop, etc.	√	-	-	-
		<b>Field Visit (Perlabian Estate):</b> Field observation and worker interview – boundaries, housing, social amenities, clinic, etc.	-	-	-	√
	12.00-14.00	<b>Break/Lunch</b>	√	√	√	√
	14.00-15.30	<b>Perlabian Estate: RSPO Document Review</b> RSPO P&C 2018 (for Best Agriculture Practices, Long Term Management Plan, Continual improvement, Legal, Social, Environment and OHS).	√	√	√	√
	15.30-16.00	<b>Report Preparation and Auditor Discussion</b>	√	√	√	√
16.00-17.00	<b>Closing Meeting</b>	√	√	√	√	

### Section 3: Assessment Findings

#### 3.1 Normative requirement applied for this assessment:

- SIPEF Group Multiple Management Units / Time Bound Plan
- RSPO P&C 2018 Generic

#### 3.2 Time Bound Plan progress for multiple management units

Time Bound Plan		
Requirement	Remarks	Compliance
Does the plan include all current subsidiaries, estates and mills that is under the control of the holding company?	PT Tolan Tiga Indonesia - Perlabian Palm Oil Mill is a subsidiary of SIPEF Group. SIPEF Group has disclose all of its companies, mills and estates. The timebound plan including un-certified units/companies.	Yes
Have all the estates and mills certified within five years after obtaining RSPO membership?	Not all the estates and mills certified within five years after obtaining RSPO membership. However, new estates and mills are under progress to be RSPO certified after RSPO NPP carried out in 2014.  Based on ACOP 2019 Sipef Group, for 100% RSPO certification for all its estates and miless in 2024.	Yes
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.	The latest acquisition noted for PT. Asri Rimba Wirabhakti in Bengkulu, announced end of 2018. Certification plan have been prepared, awaiting for RSPO LUC, RSPO RACP and RSPO NPP.	Yes
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 changes from the last audit to include PT. Asri Rimba into timebound plan. Waiting for HCV ALS review, LUC review for preparation into RSPO NPP. There was consistent with ACOP reporting	Yes
Have there been any isolated lapses in implementation of the plan? If yes a <b>Minor</b> non-compliance shall be raised	No isolated lapse. SIPEF is able to demonstrate adequate evidence related to changes in implementation of the plan.	Yes
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a <b>Major</b> non-compliance shall be raised	The delay of not abe to certify all the estate within the 5 years period from the day of RSPO membership is accepted by the assessment team.	Yes
Un-Certified Units or Holdings		
No replacement after dates defined in NIs Criterion	Assessment team checked to confirm any land conflict/liabilities on RaCP tracker and	Yes

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<p>7.3:</p> <ul style="list-style-type: none"> <li>• Primary forest.</li> <li>• Any area required to maintain or enhance HCVs in accordance with RSPO P&amp;C criterion 7.3.</li> </ul>	<p>found note "The compensation plans for PT. Umbul Mas Wisesa and PT. Toton Usaha Mandiri (SIPEF) have been approved by the Compensation Task Force during the staged implementation of the RaCP between May 2014 and November 2015".</p>	
<p>Any new plantings since January 1<sup>st</sup> 2010 shall comply with the RSPO New Plantings Procedure.</p>	<p>All new planting after January 1<sup>st</sup>, 2010 have undergone and complies with RSPO New Planting Procedure.</p>	<p>Yes</p>
<p>Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&amp;C criteria 2.2, 6.4, 7.5 and 7.6.</p> <p>The RSPO RaCP tracker shall be checked to confirm for any land conflicts/Liabilities <a href="https://www.rspo.org/certification/remediation-and-compensation/racp-tracker">https://www.rspo.org/certification/remediation-and-compensation/racp-tracker</a>. The progress on the Liabilities shall be verified and reported.</p>	<p>The assessment team has conducted a search in internet to confirm that there is a lodged land conflict that was recorded as complaint under RSPO Case Tracker; raised by individual on those units that have not been certified.</p> <p>RSPO Case Tracker recorded complaint to PT. Agro Muara Rupit, dated 17 May 2017. The complainant brought forward the issue of fraudulent land title to RSPO. The complainant claimed that his land was fraudulently sold by his cousin to PT. Agro Muara Rupit, a subsidiary of SIPEF Group.</p> <p>The summary presented in the RSPO Case Tracker:</p> <ul style="list-style-type: none"> <li>• On 25 July 2017 - Secretariat to write to the company and inform them on the complaint.</li> <li>• On 24 August 2017 (CP Meeting) - Secretariat to wait for reply from the company.</li> <li>• On 28 August 2017 - Secretariat received response from the company.</li> <li>• On 5 September 2017 - Complainant failed to provide the document.</li> <li>• On 11 September 2017 - Secretariat has sent an email to SIPEF.</li> <li>• On 26 September 2017 (CP Meeting) - Secretariat to draft the decision letter.</li> <li>• On 18 June 2018 – Complaint Panel to deliver a decision.</li> <li>• On 25 July 2018 – Complaint Panel to deliver a decision.</li> <li>• On 23 August 2018 – Draft decision letter to be reformatted.</li> <li>• On 19 September 2018 – Decision Letter – Complaints Panel.</li> <li>• On 26 September 2018 – The decision letter finalised and to be delivered to Parties.</li> </ul>	<p>Yes</p>

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	<ul style="list-style-type: none"> <li>On 24 October 2018 – Complaint Panel Decision letter has been sent to parties. Deadline for submission of appeals is on 20 December 2018.</li> <li>On 20 December 2018 – The complaint is officially closed.</li> </ul> <p>The case tracker available on link <a href="https://askrspo.force.com/Complaint/s/case/5090000028Es1JAAS/detail">https://askrspo.force.com/Complaint/s/case/5090000028Es1JAAS/detail</a></p> <p>“The compensation plans for PT. Umbul Mas Wisesa and PT. Toton Usaha Mandiri (SIPEF) have been approved by the Compensation Task Force during the staged implementation of the RaCP between May 2014 and November 2015”.</p>	
<p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&amp;C criterion 6.3.</p>	<p>No labor dispute noted. The assessment team has conducted a search in internet to confirm that there is no new comments or dispute raised by the communities on those units that have not been certified.</p>	<p>Yes</p>
<p>Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&amp;C criteria 2.1</p>	<p>No legal non-compliance noted. The assessment team has conducted a search in internet to confirm that there is not new comments or dispute raised by the communities on those units that have not been certified.</p>	<p>Yes</p>
<p>Did the company conduct internal audit against the uncertified management units requirement? If yes, a positive assurance statement shall be available.</p>	<p>The internal audit against the uncertified management units requirement has been conducted for all uncertified units:</p> <ul style="list-style-type: none"> <li>PT. Agro Rawas Ulu was conducted on 20-21 March 2019 – including assessment against criterion 2.1; 2.2; 2.3; 6.3; 6.4; 7.3; 7.5; 7.6;</li> <li>PT. Agro Kati Lama was conducted on 4-6 March 2019 assessing criterion 2.1; 2.2; 2.3; 6.3; 6.4; 7.3; 7.5; 7.6;</li> <li>PT. Agro Muara Rupit was conducted on 18-20 March 2019 – including assessment against criterion 2.1; 2.2; 2.3; 6.3; 6.4; 7.3; 7.5; 7.6;</li> </ul> <p>Each Management Unit has provide correction and corrective action to ensure all RSPO P&amp;C and partial certification requirements are implemented.</p>	<p>Yes</p>
<p>Have there been any stakeholder (including NGO) consultation conducted?</p>	<p>Yes. Stakeholder comments are noted.</p> <p>The assessment team has conducted a</p>	<p>Yes</p>

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	<p>search in internet to confirm that there is a comment that was recorded as complaint under RSPO Case Tracker; raised by the individual on those units that have not been certified.</p> <p>RSPO Case Tracker recorded complaint to PT. Agro Muara Rupit, dated 17 May 2017. The complainant brought forward the issue of fraudulent land title to RSPO. The complainant claimed that his land was fraudulently sold by his cousin to PT. Agro Muara Rupit, a subsidiary of SIPEF Group.</p> <p>The case tracker available on link <a href="https://askrspo.force.com/Complaint/s/case/5090000028Es1JAAS/detail">https://askrspo.force.com/Complaint/s/case/5090000028Es1JAAS/detail</a></p>	
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**3.3 Progress of scheme smallholders and/or outgrowers**

Progress of scheme smallholders or outgrowers towards compliance with relevant standards		
Requirement	Remarks	Compliance
<p>Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification?</p> <p>OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years.</p>	<p>There is no smallholder supplying FFB to PT Tolan Tiga Indonesia.</p> <p>PT Tolan Tiga Indonesia does not received FFB from smallholders, therefore does not obliged to comply with the standard within three years of the mill's initial certification.</p>	<p>N/A</p>

**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 Re-certification Assessment there were no Major & no Minor nonconformities raised.

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 its effectiveness and closed accordingly. The below is the summary of the non-conformity raised during this assessment.

Non-conformity			
NCR Ref #	Nil	Clause & Category	

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		(Major / Minor)	
<b>Date Issued</b>		<b>Due Date</b>	
<b>Closed (Yes / No)</b>		<b>Date of nonconformity Closure</b>	
<b>Statement of Nonconformity:</b>			
<b>Requirement Reference:</b>			
<b>Objective Evidence:</b>			
<b>Corrections:</b>			
<b>Root Cause Analysis:</b>			
<b>Corrective Actions:</b>			
<b>Assessment Conclusion:</b>			

<b>Opportunity for Improvements</b>	
<b>OFI #</b>	<b>Description</b>
<b>OFI 1</b>	Point of consideration: consistency of monitoring of all license are well implemented by respective department.

<b>Positive Findings</b>	
<b>PF #</b>	<b>Description</b>
<b>PF 1</b>	Consistent records in implementation of RSPO P&C 2018
<b>PF 2</b>	PT. Tolan Tiga Indonesia demonstrate perseverance and consistency – in terms of provide positive response upon comments, claim, protest from community members.

**3.4.1 Status of Nonconformities Previously Identified and Observations**

<b>Non-conformity</b>			
<b>NCR Ref #</b>	<b>1754045-201903-M1</b>	<b>Clause &amp; Category (Major / Minor)</b>	RSPO Supply Chain Certification Standard (June 2017) General Chain of Custody Requirement-Clause 5.7.2 - Major
<b>Closed (Yes / No)</b>	<b>Yes</b>	<b>Date of nonconformity Closure</b>	<b>3 May 2019</b>
<b>Statement of Nonconformity:</b>	PT Tolan Tiga Indonesia – Perlakuan POM have not consistently demonstrated removal of RSPO certified volumes sold under other scheme or as conventional,		



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	<p>or in case of underproduction, loss or damage.</p>
<p><b>Requirement Reference:</b></p>	<p>RSPO SCCS, General Chain of Custody Requirements - Clause 5.7.2  The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform:</p> <ul style="list-style-type: none"> <li>- 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.</li> <li>- 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.</li> <li>- Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed.</li> <li>- Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements.</li> </ul>
<p><b>Objective Evidence:</b></p>	<p>PT Tolan Tiga Indonesia – Perlabian POM demonstrated some of the CSPO and CSPK transaction for other scheme and/or conventional sales have been removed from PalmTrace. However, the other transaction have not been removed:</p> <ul style="list-style-type: none"> <li>- PT. Tolan Tiga Indonesia – Perlabian POM removed 4999.98 MT CSPO from PalmTrace through transaction ST-TR-297ef27e-eb48 dated 11 June 2018 (ISCC).</li> <li>- PT. Tolan Tiga Indonesia – Perlabian POM removed 1999.91 MT CSPO from PalmTrace through transaction ST-TR-b13ce282-9291 dated 11 June 2018 (ISCC).</li> <li>- PT. Tolan Tiga Indonesia – Perlabian POM removed 2999.98 MT CSPO from PalmTrace through transaction ST-TR-61c53804-824a dated 21 December 2018 (ISCC).</li> <li>- Another 14,547.55 MT CSPO from confirmed ISCC and/or conventional sales have not been removed from PalmTrace.</li> <li>- PT. Tolan Tiga Indonesia – Perlabian POM removed 3,500 MT CSPK from PalmTrace through transaction ST-TR-be688555-06a7 dated 28 March 2018.</li> <li>- Another 2,324.71 MT CSPK from confirmed ISCC and/or conventional sales have not been removed from PalmTrace.</li> </ul>
<p><b>Corrective Actions:</b></p>	<ul style="list-style-type: none"> <li>- Team Marketing in Head Office Medan participated in training related to RSPO SCCS v.2014 rev.2017 organized by ENC team. Training dated 16 April 2019;</li> <li>- Team Marketing in Head Office Medan communicated through email for sending all information related to: volume of certified RSPO CPO and/or PK sold under other schemes or as conventional, or in case of production shortages, loss or damage to Antwerp for removing CPO and/or PK quota at PT Tolan Tiga Indonesia</li> <li>- Antwerp inform every detail removing quota to the Team Marketing in Head Office Medan.</li> <li>- Manager ENC notified to Antwerp that the above procedure is mandatory.</li> </ul>

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<b>Assessment Conclusion:</b>	<p>Based on review to supply chain documentation and implementation in Perlavian Oil Mill, Audit Team conclude that the Major NC is remain closed.</p> <p>Data verification during RAV – March 2020:          As a Palm Oil Mill which takes legal ownership and physically handled RSPO certified sustainable oil palm product, PT Tolan Tiga Indonesia – Perlavian POM has made Shipping Announcement for certified PK sold. For period 2019 until February 2020, certified CPO were sold for other certified scheme (ISCC).</p> <p>For example:</p> <ul style="list-style-type: none"> <li>Shipping Announcement transaction ID TR-588be23e-f5ff dated 30 Aug 2019; for 600 MT CSPK IP; from PT Tolan Tiga Indonesia – Perlavian POM as Seller to Buyer PT Ivo Mas Tunggal.</li> <li>Shipping Announcement transaction ID TR-e158f7a8-624f dated 13 Dec 2019; for 377.54 MT CSPK IP; from PT Tolan Tiga Indonesia – Perlavian POM as Seller to Buyer PT Ivo Mas Tunggal.</li> </ul> <p>PT Tolan Tiga Indonesia – Perlavian POM is producing sustainable CPO and PK. The RSPO P&amp;C certification scope does not go beyond refinery.          "Trace" is not applicable.</p> <p>PT Tolan Tiga Indonesia - Perlavian POM has done "Remove" in the RSPO IT Platform for CSPO sold as other scheme (ISCC or conventional), e.g.:</p> <ul style="list-style-type: none"> <li>Transaction ID: ST-TR-49b78594-373b; dated 13 Dec 2019; Stock Transaction Type: Remove from certified stock; Transaction volume: 2,825.79 MT.</li> <li>Transaction ID: ST-TR-b665e036-5901; dated 13 Dec 2019; Stock Transaction Type: Remove from certified stock; Transaction volume: 498.84 MT.</li> <li>Transaction ID: ST-TR-9039136d-75cd; dated 13 Dec 2019; Stock Transaction Type: Remove from certified stock; Transaction volume: 486.45 MT.</li> </ul>
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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)
032936M0	Major	RSPO P&C 2.1.1	15 <sup>th</sup> March 2014	Closed on 14 <sup>th</sup> May 2014
1032936M16	Major	RSPO P&C 5.3.2	15 <sup>th</sup> March 2014	Closed on 14 <sup>th</sup> May 2014
1032936M27	Major	RSPO P&C 5.6.2	15 <sup>th</sup> March 2014	Closed on 14 <sup>th</sup> May 2014
1032936N1	Minor	RSPO P&C 2.1.4	15 <sup>th</sup> March 2014	Closed on 1 <sup>st</sup> April 2015
1032936N11	Minor	RSPO P&C 4.7.3	15 <sup>th</sup> March 2014	Closed on 1 <sup>st</sup> April 2015
1032936N25	Minor	RSPO P&C 4.7.4	15 <sup>th</sup> March 2014	Closed on 1 <sup>st</sup> April 2015
1032936N26	Minor	RSPO P&C 4.7.5	15 <sup>th</sup> March 2014	Closed on 1 <sup>st</sup> April 2015

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1032936N28	Minor	RSPO P&C 5.3.3	15 <sup>th</sup> March 2014	Closed on 1 <sup>st</sup> April 2015
1149548M1	Major	RSPO P&C 1.1.2	1 <sup>st</sup> April 2015	Closed on 5 <sup>th</sup> May 2015
1174416N1	Minor	RSPO P&C 2.1.3	1 <sup>st</sup> April 2015	Closed on 16 <sup>th</sup> March 2016
1149548N1	Minor	RSPO P&C 6.1.4	1 <sup>st</sup> April 2015	Closed on 16 <sup>th</sup> March 2016
1304318N1	Minor	RSPO P&C 4.7.6	16 <sup>th</sup> March 2016	Closed on 23 <sup>rd</sup> February 2017
1754048-201903-M1	Major	RSPO Supply Chain Certification Standard (June 2017) General Chain of Custody Requirement-Clause 5.7.2	30 <sup>th</sup> March 2019	Closed on 3 <sup>rd</sup> May 2019

**3.5 Stakeholders and previous land owner / user consultation**

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss PT Tolan Tiga Indonesia – Perlabian POM and supply bases environmental and social performance, legal and any known dispute issues.

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

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

<b>List of Stakeholders contacted</b>	
<p><b>Internal Stakeholders</b></p> <p>Pengurus Komite Gender PLE, TLE dan PLM</p>	<p><b>Union/Contractors</b></p> <ul style="list-style-type: none"> <li>• Ketua, Sekretaris dan Bendahara Serikat Pekerja PLE, TLE dan PLM</li> <li>• Local contractor CV Tua Gabe and UD Jair (FFB and EFB Transporter)</li> </ul>
<p><b>Government Departments of Labuhan Batu Selatan</b></p> <ul style="list-style-type: none"> <li>• Kabid PPUP Dinas Perkebunan dan Peternakan</li> <li>• Kabid Hubungan Industrial Dinas Tenaga Kerja</li> <li>• Kabid PPLH Dinas Lingkungan Hidup</li> <li>• Kepala desa, kepala dusun dan tokoh masyarakat</li> </ul>	<p><b>NGO</b></p> <ul style="list-style-type: none"> <li>• Local journalist from Mitra Polda News</li> <li>• LBHI MASMADA Labusel</li> </ul>

dari Desa Pekan Tolan, Meranti, Air Merah dan Desa Tanjung Medan	
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IS#	Stakeholders comment
1	<p><b>Feedbacks:</b></p> <p><b>Stakeholder consultation (Focus Group Discussion) Pengurus Serikat Pekerja, Pengurus Komite Gender</b></p> <ul style="list-style-type: none"> <li>• Labour Unit (Serikat Pekerja Mandiri) was established since 2010.</li> <li>• PT Tolan Tiga Indonesia provides opportunities for employees to gather and organize. The union administrator is given a special dispensation in carrying out organizational activities.</li> <li>• There is a Bipartite forum between management representatives (employers) and employees (worker unions) that are running very well and effectively. In general, all complaints and inputs were submitted to the forum and responded well.</li> <li>• Collective Labour Agreement (PKB) is available, the contents of which are based on mutual agreement. So far, both parties have obeyed and carried out well the agreements contained in the PKB.</li> <li>• There are no disputes related to industrial relations that are currently taking place.</li> <li>• All employees have been included in the Health Insurance (BPJS Kesehatan) and Social Insurance (BPJS Ketenagakerjaan) programs.</li> <li>• The company has disseminated company policies to employees through worker unions. For example, policies related to the prohibition of employing children, the minimum age limit, the prohibition of hiring female workers who are pregnant or breastfeeding at high risk jobs using chemicals, equal rights to work and careers, respect for human rights.</li> <li>• The gender committee has disseminated its functions and roles to women workers. Including communication channels if there are complaints or harassment at work.</li> <li>• There are no cases of sexual harassment currently being handled by the gender committee.</li> </ul> <p><b>Management Responses:</b></p> <ul style="list-style-type: none"> <li>• PT Tolan Tiga Indonesia is committed in freedom of association as evidenced by the Freedom of Association Policy (QMM-40-01-P12) and has been disseminated to all levels of workers during morning briefing. The company also provides special dispensation to the union administrators to carry out organization activities in the Collective Labour Agreement (PKB)</li> <li>• PT Tolan Tiga Indonesia and the Bukit Maradja Independent Workers Union have formed a Bipartite Cooperation Institution that has been ratified by the Manpower Office of S Labuhanbatu Selatan Regency and has held meetings regularly every month. In general, meeting discuss complaints and input from employees or representatives.</li> <li>• Collective Labour Agreements (PKB) that have been approved and signed by company known by the Labuhanbatu Selatan Regency Manpower Office are always obeyed and executed in accordance with the agreements set forth in the Collective Labour Agreement. At this time, the PKB used and approved was for period 2018 - 2020.</li> <li>• There are no disputes related to industrial relations.</li> <li>• All employees of PT Tolan Tiga Indonesia has been registered in BPJS Kesehatan (health insurance) and BPJS Ketenagakerjaan (social insurance). Evidence of monthly payments were available.</li> <li>• PT. Eastern Sumatra Indonesia has provided information to all employees regarding company policies such as child labour policies, policies that prohibit pregnant and breastfeeding women from working in chemicals, human rights policies, equal employment policies and others. The policy is delivered</li> </ul>

	<p>routinely every morning during morning briefing.</p> <ul style="list-style-type: none"> <li>Gender committee of PT Tolan Tiga Indonesia has provided information on functions and roles to all workers and holds regular meetings every month.</li> <li>There was no issue of sexual harassment at PT Tolan Tiga Indonesia</li> </ul>
	<p><b>Audit Team Findings:</b> Positive comments noted, no further comment needed.</p>
<p><b>2</b></p>	<p><b>Feedbacks:</b> <b>Pangulu (Village Head) Desa Pekan Tolan, Meranti, Air Merah dan Desa Tanjung Medan.</b></p> <ul style="list-style-type: none"> <li>PT Tolan Tiga Indonesia, represented by managers and staff, has a good and effective relationship with surrounding village heads and community leaders.</li> <li>The company's concession area has existed since the colonial era. Thus, there is no land acquisition process that involves community members.</li> <li>There are no cases of land disputes between communities and companies.</li> <li>Some positive impacts of the existence of the company are employment opportunities (although not much) for local residents, the existence of routine assistance programs for village infrastructure. maintenance (heavy equipment lending), partnerships with oil palm farmers (currently under scheme and program, socialization implemented in January 2020), providing POM waste (solid) as a mixture of animal feed etc.</li> <li>The Pangulu hoped that the information on job vacancies was conveyed more openly to them so that the workforce in the surrounding villages could prepare themselves. Existing vacancies should prioritize local residents according to their competencies.</li> <li>Simplifying the bureaucracy of heavy equipment loans. Previously only the manager's approval, but now it must be approved by the Medan HO office.</li> <li>PT. Tolan Tiga Indonesia attended claim over land, coming from community members from Kecamatan Bilah Hulu district, Labuhanbatu Selatan regency. The claim was for land of 716.40 Ha in Tolan Estate, however the claimant cannot point the exact location of disputed area. Claims by Kelompok Tani Bersatu (KTB)</li> </ul>
	<p><b>Management Responses:</b></p> <ul style="list-style-type: none"> <li>PT. Tolan Tiga Indonesia is committed to maintaining good relations with surrounding communities. This can be seen based on the results of the social impact assessment conducted every year that the percentage of people stating a good relationship with the company tends to be higher. In 2019 a percentage of 72% and another 28% answered normal.</li> <li>There was no land acquisition process because the company had existed since the colonial era.</li> <li>There are no issues regarding disputes over PT. Tolan Tiga Indonesia</li> <li>In addition to providing work opportunities, the company is also committed to contribute to the surrounding community by providing assistance in the form of improving facilities and access by borrowing heavy equipment, providing solid as livestock feed, etc.</li> <li>PT. Tolan Tiga Indonesia has submitted information related to job vacancies to the surrounding community by providing distribution of vacancies to the surrounding village communities through village officials and distribution on the information board.</li> <li>Borrowing of heavy equipment must get prior approval from the head office or not only approval from the plantation manager. This is in accordance with the provisions and procedures written in the Corporate Social Responsibility procedure (LCA-01-06/01-12-2019/Rev. 0).</li> <li>PT. Tolan Tiga Indonesia attended claim over land, coming from community members from Kecamatan Bilah Hulu district, Labuhanbatu Selatan regency. The claim was for land of 716.40 Ha in Tolan Estate, however the claimant cannot point the exact location of disputed area.</li> <li>Document sighted:             <ul style="list-style-type: none"> <li>"Surat Kepolisian Negara Republik Indonesia Daerah Sumatera Utara Resor Labuhanbatu No.B/7135/X/Bag Ops, dated 24 October 2018 related invitation for mediation. The mediation</li> </ul> </li> </ul>

	<p>date 29 October 2018, for claim "Klaim Kelompok Tani Bersatu Dusun Menanti, Desa Meranti, Kecamatan Bilah Hulu, Kabupaten Labuhanbatu di areal HGU PT. Tolan Tiga Indonesia di Dusun Sri Pinang, Desa Perkebunan Perlavian, Kecamatan Kampung Rakyat, Kabupaten Labuhanbatu Selatan" of 716.40 Ha.</p> <ul style="list-style-type: none"> <li>o Minutes of mediation meeting "Notulen Rapat Mediasi terkait Klaim Lahan Kelompok Tani Bersatu Dusun Menanti, Desa Meranti, Kecamatan Bilah Hulu, Kabupaten Labuhanbatu di areal HGU PT. Tolan Tiga Indonesia di Dusun Sri Pinang, Desa Perkebunan Perlavian, Kecamatan Kampung Rakyat, Kabupaten Labuhanbatu Selatan", dated 29 October 2018. Conclusion: "Polres Labuhanbatu akan mengadakan koordinasi dengan Pemerintah Kabupaten Labuhanbatu Selatan/Bupati dalam upaya penyelesaian sengketa lahan. Akan dilakukan pertemuan/mediasi lanjutan menunggu hasil koordinasi dengan pihak Pemerintah Kabupaten Labuhanbatu Selatan dan akan mengundang pihak yang bersengketa. Kepada pihak yang bersengketa agar bersama-sama menciptakan kamtibmas yang kondusif" – police will made subsequent coordination meeting with government from Labuhanbatu Selatan regency, for all parties to maintain security and conducive situation.</li> <li>o Copy of State Court Decision for the same case in 2014, which resulted in have been sighted "Salinan Putusan Pengadilan Negeri Rantauprapat – Perkara Perdata Gugatan Reg.No.56/PDt.G/2013/PN-RAP antara Kelompok Tani Bersaru (KTB) Penggugat lawan PT. Tolan Tiga Indonesia (SIPEF) Dkk Tergugat. Dalam Pokok Perkara: Menyatakan Gugatan Penggugat tidak dapat diterima (Niet Onvankikje ver klaard). Dalam Rekonsensi: Menolak Gugatan Rekonsensi Penggugat untuk seluruhnya" dated 16 September 2014 – repudiate plaintiff claim.</li> </ul>
	<p><b>Audit Team Findings:</b></p> <ul style="list-style-type: none"> <li>• Auditor acknowledge that the company has provided public information on job vacancies through communication with village officials and information board.</li> <li>• Auditor acknowledge the company's procedure on heavy equipment uses as in Corporate Social Responsibility procedure (LCA-01-06/01-12-2019/Rev. 0).</li> <li>• Auditor team noted the progress of claim over land, coming from community members from Kecamatan Bilah Hulu district, Labuhanbatu Selatan regency.</li> </ul>
<p><b>3</b></p>	<p><b>Feedbacks:</b></p> <p><b>Local Contractor / Supplier (CV Tua Gabe dan UD Jair)</b></p> <ul style="list-style-type: none"> <li>• PT Tolan Tiga Indonesia have a FFB transport contract. In the agreement, the contractor is required to provide trucks, drivers and helpers. Each unit consists of 3 workers. With 5 units available, the contractor currently has 15 workers in the field. In addition, the contractor is also required to provide PPE for his employees for free.</li> <li>• In a work contract signed and agreed by both parties, there are several clauses for example:             <ol style="list-style-type: none"> <li>1. Not employing under age workers</li> <li>2. Contractor workers must use PPE.</li> <li>3. Registering all employees in the BPJS Kesehatan and BPJS Ketenagakerjaa program.</li> </ol> </li> <li>• There are high turnover of contractor's employee that caused the contractor cannot consistently register and pay BPJS Kesehatan and Ketenagakerjaan membership.</li> </ul> <p><b>Management Responses:</b></p> <ul style="list-style-type: none"> <li>• The contractor CV Tua Gabe dan UD Jair has signed and agreed the clause on not employing under age worker, workers must use PPE, and register all employees in the BPJS Kesehatan and Ketenagakerjaan program. This is written in the work agreement that was signed together with the company.</li> <li>• The contractor CV Tua Gabe dan UD Jair has made a statement dated 19 March 2020, that the company PT. MPN will register their employees in BPJS Kesehatan and BPJS Ketenagakerjaa in accordance with the Manpower Act.</li> </ul>

	<p><b>Audit Team Findings:</b></p> <ul style="list-style-type: none"> <li>Positive comments noted, no further comment needed.</li> </ul>
5	<p><b>Feedbacks:</b></p> <p><b>Local Journalist - Mitra Polda News</b></p> <p>The company has a good relationship with the community. Until now there have been no complaints or disputes between the company and surrounding communities related to land, environmental pollution and other social unrest..</p>
	<p><b>Management Responses:</b></p> <p>The company has established a good relationship with the community. This can also be seen from the results of the results of the social impact assessment carried out by the company to the community about once a year. Based on the results of the 2019 assessment the percentage of people who said that good relations with the company was 72% and another 28% said it was normal.</p>
	<p><b>Audit Team Findings:</b></p> <p>Positive comments noted, no further comment needed.</p>
6	<p><b>Feedbacks:</b></p> <p><b>Manpower Office of Labuhanbatu Regency</b></p> <ul style="list-style-type: none"> <li>The company has good relationship with Manpower Office of Labuhanbatu Selatan Regency, demonstrated by compliance with compulsory labour reporting, PKWT (contract) agreement recording and PKB registration and other employment related consultations.</li> <li>The company has a good bipartite cooperation forum and has produced a Collective Labour Agreement (PKB). So far, the contents of the PKB are the best in Labuhanbatu Selatan Regency. The implementation went well and there were no complaints or violations of the contents of the PKB.</li> <li>There are no cases of labour disputes (industrial relations) currently taking place.</li> </ul>
	<p><b>Management Responses:</b></p> <ul style="list-style-type: none"> <li>PT Tolan Tiga Indonesia maintains good relations with the Government such as the Manpower Office of Labuhanbatu Selatan Regency. Also routinely send reports on employment of both permanent employees and PKWT (contract) as well as PKB registration and other consultations..</li> <li>Companies and worker unions have formed a bipartite cooperation forum that has been ratified by the Labuhanbatu Selatan Regency Manpower Office. The entire agreement written in the PKB has been fulfilled and there are no complaints or violations regarding the contents of the PKB.</li> <li>There are no issues/disputes about employment in PT Tolan Tiga Indonesia.</li> </ul>
	<p><b>Audit Team Findings:</b></p> <p>Positive comments noted, no further comment needed.</p>
7	<p><b>Feedbacks:</b></p> <p><b>Agriculture and Plantation Office of Labuhanbatu Selatan Regency</b></p> <ul style="list-style-type: none"> <li>The company has a good relationship with the government office. Demonstrated by compliance with compulsory plantation reports such as the Plantation Business Development Report (LPUP), land fire monitoring etc.</li> <li>The company has fulfilled permits related to its business such as HGU, IUP, environmental permit etc. In addition, the company has also participated in a re-assessment of PUP in 2019.</li> <li>There are no cases of land disputes currently taking place on company concession lands.</li> <li>There is information that the company will enter into a partnership with oil palm farmers in the vicinity, please submit progress to the agency.</li> </ul>
	<p><b>Management Responses:</b></p> <ul style="list-style-type: none"> <li>The company routinely submits report of Plantation Business Development Activities (LPUP) every semester and annual land fire monitoring reports.</li> </ul>

	<ul style="list-style-type: none"> <li>• Business licenses of companies such as HGU, IUP, Environmental Permit, etc. have been fulfilled and overall permits are still valid.</li> <li>• There are no cases of land disputes in the operational area of PT Tolan Tiga Indonesia</li> <li>• It is true that there will be a partnership with nearby oil palm farmers and this will be informed to the Agriculture and Plantation Office in Labuhanbatu Selatan Regency after the company has obtained accurate information on the identity of the farmers, area cover, location, area boundary and land ownership status.</li> </ul> <p><b>Audit Team Findings:</b>          Auditor will verify the progress of partnership between the company and the oil palm farmers during next surveillance assessment.</p>
<p><b>8</b></p>	<p><b>Feedbacks:</b>  <b>Environmental Office of Labuhanbatu Selatan Regency</b></p> <ul style="list-style-type: none"> <li>• The company has a good relationship with the government office, demonstrated by compliance with mandatory environmental reports such as RKL/RPL reports, liquid waste, LB3 etc.</li> <li>• The company already has an environmental permit for its operations. But the agency has not known about permits for composting activities and domestic waste management agencies, does it already have a permit.</li> <li>• During the last year until now, there have been no records of complaints/disputes related to environmental violations or pollution caused by operational activities.</li> </ul> <p><b>Management Responses:</b></p> <ul style="list-style-type: none"> <li>• PT Tolan Tiga Indonesia has a good relationship with the Environmental Agency. The company has routinely submits RKL/RPL reports every semester. Delivery of reports is done manually to the District and Provincial Offices while to KLHK (Ministry of Environment) the delivery of reports is done online.</li> <li>• There is no record of complaints/disputes related to environmental pollution due to the company's operational activities during 2019.</li> </ul> <p><b>Audit Team Findings:</b>          Auditor acknowledge that there is no record of complaints/disputes related to environmental pollution due to the company's operational activities during 2019.</p>
<p><b>9</b></p>	<p><b>Feedbacks:</b>  <b>LBHI MASMADA Labusel</b> (was sent by email dated 17<sup>th</sup> March 2020)          Message from us:          We hope that you can inspect the said Collective Labor Agreement and provide recommendations regarding the retirement age so that it complies with Government Regulation Number 45 of 2015.</p> <p><b>Management Responses:</b>          Respon provided as per Letter from Manager HR PT Tolan Tiga Indonesia, dated 19 March 2020, the document was explained:</p> <ul style="list-style-type: none"> <li>• PT Tolan Tiga Indonesia and Labor Unio of Tolan Tiga Mandiri have arranged about retirement in the Collective Labor Agreement (PKB), refer to Article 154 of Law No 13 of 2003 concerning Manpower, was mentioned "Workers/labors reach retirement age in accordance with provision in work agreements company regulation, Collective Labor Agreements (PKB) or statutory regulations</li> <li>• The retirement age was agreed in Collective Labor Agreement (PKB), such as:             <ul style="list-style-type: none"> <li>○ The working period is at least 30 (thirty) years, or</li> <li>○ Age 55 (fifty five) years, or</li> </ul> </li> </ul>



**RSPO Public Summary Report**  
**Revision 9 (Nov 2019)**

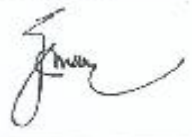
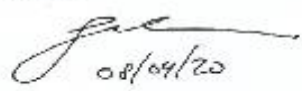
	<ul style="list-style-type: none"> <li>○ The working period is at least 20 (twenty) years can apply for early retirement</li> <li>• All employee of PT Tolan Tiga Indonesia understand the retirement as stipulated in the Collective Labor Agreement (PKB). The management also need the state that the industrial relation at PT Tolan Tiga Indonesia remain good and that the Collective Labor Agreement (PKB) will be evaluated every 2 (two) years between Management and Labor Union for welfare of workers and the company.</li> </ul>
	<p><b>Audit Team Findings:</b>          Auditor acknowledge the management respon</p>

List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
N/A					
<p><i>Note:</i>            All the unit of certification area have been existed since colonial era. The company's concession area originated from colonial ownership, there is no community land that has been compensated. Therefore, there is no previous land owner existed in Perlabian Estate and Tolan Estate</p>					

Previous land owner / user comment	
<b>N/A</b>	<b>Feedbacks:</b>
	<b>Management Responses:</b>
	<b>Audit Team Findings:</b>

**3.6 Impartiality and conflict of interest**

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

<b>Formal Signing-off of Assessment Conclusion and Recommendation</b>	
<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 Tolan Tiga Indonesia – Perlabian POM has complied with the RSPO Principles and Criteria Generic November 2018 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 Tolan Tiga Indonesia – Perlabian POM is continued.</p>	
<b>Report prepared by</b>	<b>Acceptance of Assessment Conclusion</b>
<b>Name:</b> Imam Fakhrurozi	<b>Name:</b> Sander Van den Ende
<b>Company Name:</b> On behalf of BSI Malaysia Services Sdn Bhd	<b>Company Name:</b> PT Tolan Tiga Indonesia – Perlabian POM
<b>Title:</b> Lead Assessor	<b>Title:</b> Regional Director Sustainability
<b>Signature:</b> 	<b>Signature:</b> 
<b>Date:</b> 7Apr 2020	<b>Date:</b> Apr 2020

**Appendix A: Summary of Findings**

Criterion / Indicator	Assessment Findings	Compliance
<b>Principle 1: Behave ethically and transparently</b>		
Drive ethical business behaviour, build trust and transparency with stakeholders to ensure strong and healthy relationships.		
<b>Criteria 1.1</b>		
The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.		
1.1.1	<p><b>(C)</b> Management documents that are specified in the RSPO P&amp;C are made publicly available.</p> <p>PT Tolan Tiga Indonesia has identified and determined document that available for public, as in "Dokumen-Dokumen yang Tersedia untuk Umum" dated 14 September 2019, consist of:</p> <ul style="list-style-type: none"> <li>• Land title</li> <li>• <i>Akta Perubahan Perusahaan</i></li> <li>• Plantation permit</li> <li>• HCV Assessment report</li> <li>• SEIA Report.</li> <li>• Land acquisition procedure.</li> <li>• Company policies.</li> <li>• Land application permit</li> <li>• Environmental evaluation document</li> <li>• Permit of EFB and effluent utilization for composting plant.</li> <li>• Temporary hazardous waste storage.</li> <li>• Environmental management and monitoring report (each semester)</li> <li>• CD/CSR report (each semester)</li> <li>• Annual OHS program</li> <li>• HCV Assessment Report.</li> <li>• Continuous improvement</li> <li>• Pollution reduce and preventive plan</li> <li>• Public summary report from certification assessment.</li> <li>• Log book incoming letter from stakeholder.</li> </ul>	Comply

		The document can be accessed through Senior Manager Operation or Office Assisstant.	
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders.	Based on document verification, all information is provided in Bahasa. The document can be accessed through Senior Manager Operation or Office Assisstant.	Comply
1.1.3	<b>(C)</b> Records of requests for information and responses are maintained.	<p>PT Tolan Tiga Indonesia – Perlabian Mill, Perlabian Estate and Tolan Tiga Estate has had incoming letter logbook from stakeholder namely "<i>Permintaan Informasi dan Jawaban</i>" that listed entire incoming letter from stakeholder. For example, Perlabian Mill has documented request of effluent letter from village headof Air Merah on 14 January 2020. On the same day, mill manager has responded the letter and accept the request.</p> <p>According to the procedure, head clerk as personal in charge to maintain the documentation of all incoming letter and answer. Through the random checking of incoming letter filing concluded that all the letter are in place.</p>	Comply
1.1.4	<b>(C)</b> Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official.	<p>Certificate holder has had Responding to Request for Information Procedure (ENC-01-11/04-03/2019/Rev.1) that approved by Principal Director since 18 March 2019. Some important or guidance of the procedure was:</p> <ul style="list-style-type: none"> <li>• Unit management should provide a record book of information and answers with the shelf life "CONTINOUS/ONGOING".</li> <li>• Requested for information / data referred to this procedure are requests for written information by mail, fax, e-mail or verbally (directly delivered via telephone, including sort message service from stakeholder at the farm/mill/factory.</li> <li>• Evaluation of information request by stakeholders (publicly accessed document and non-publicly accessed document.</li> <li>• Time limit to response the information request.               <ol style="list-style-type: none"> <li>a. If needed assistance from senior manager office: within 3 working days</li> <li>b. If needed assistance from department head: within 7 working days.</li> <li>c. If needed assistance from board if director: within 25 working days.</li> </ol> </li> </ul> <p>Certificate holder also had Grievance Procedure (IAD-01-08/22-01-2020/Rev.0) approved since 30 January 2020. Some important notice written in this procedure was:</p>	Comply

		<ul style="list-style-type: none"> <li>• Complainants sends grievance by email, WhatsApp and messages to grievance block.</li> <li>• All complainant are to be given response within 3 days.</li> <li>• Department concerned collect information and documents to answer question of complainant.</li> <li>• A formal response referencing the original grievance will be sent within 30 days and will be informed if more than 30 days.</li> <li>• Informing that the complainant have to answer within two weeks, complainant should confirm that they are satisfied within two weeks, if no answer the case will be closed.</li> </ul> <p>The operating unit is responsible for managing and carrying out the procedure above. Head of OU appointed PIC to socialize those procedure. Sighted the evidence of socialization conducted by mill assistant to the mill workers on 9 March 2020.</p> <p>Based on public consultation with respective village head surrounding area such as village head and community leader from Pekan Tolan, Menanti, Air Merah and Tanjung Medan Village obtained information that the requested information procedures and or donation proposals have been well informed. However, the village head usually requested information by phone or short message services directly to the estate/mill manager. Request of information submitted usually for donation proposals or heavy equipment loans which also signed by sub district head.</p> <p>During the audit, auditor also conducted focus group discussion with internal stakeholder such as labour union and gender committee. Through the interview obtained information that if any information request usually through the bipartite meeting. Until now, all requests for information were answered well in a bipartite meeting.</p>	
1.1.5	There is a current list of contact and details of stakeholders and their nominated representatives.	<p>Certificate holder has had current list of contact and details of stakeholders. Sighted stakeholder list of Perlabian POM as follows:</p> <ul style="list-style-type: none"> <li>• District head: 6 stakeholders</li> <li>• Sub-District head: 3 stakeholders</li> <li>• Village head: 8 stakeholders</li> <li>• NGO's and local journalist: 2 stakeholders</li> </ul>	Comply

		<ul style="list-style-type: none"> <li>• Labor union: 5 stakeholders</li> <li>• Local contractors: 6 stakeholders</li> <li>• Supplier: 2 stakeholders</li> </ul> <p>All list of stakeholders and their contacts are in place.</p> <p>The frequency of updating is annually as per procedure of communication and consultation Doc No. ENC-01-09/04-03-2019/Rev.1.</p>	
<p><b>Criteria 1.2</b>          The unit of certification commits to ethical conduct in all business operations and transactions.</p>			
1.2.1	<p>A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.</p>	<p>Certificate holder has had ethics policy inside Responsible Plantation Policy that signed by Board of Director on 22 November 2019. The policy can be seen and downloaded at their website <a href="https://www.sipef.com/hq/sustainability/policies/ethics-policy/">https://www.sipef.com/hq/sustainability/policies/ethics-policy/</a>. SIPEF Ethics Policy stated that:</p> <ul style="list-style-type: none"> <li>• <i>Compliance: all relevant international and national laws will be upheld.</i></li> <li>• <i>Transparency: shareholders and stakeholders will be provided with all non-confidential information.</i></li> <li>• <i>Zero-tolerance towards bribery and corruption. Facilitation payments are actively avoided and gifts may only be given with prior approval from senior management.</i></li> <li>• <i>There is zero-tolerance of slavery or forced labour.</i></li> <li>• <i>Management and employees are prohibited from using the Group's facilities or working hours to conduct personal business.</i></li> </ul> <p><i>The individual countries have more elaborated codes of conduct that are aligned with the worldwide Sipef Group's Ethics Policy.</i></p> <p>Socialization of this policy has conducted regularly. For example, sighted the record of company's policies socialization (human rights, ethics, environmental, OHS, sexual harassment etc) on 14 and 18 February 2020, attended by 25 mill workers (foreman, weighbridge operator, office worker, laboratory, godown master, biogas officer etc).</p> <p>To prove the implementation of the code of ethics, the team of auditors has interviewed</p>	Comply

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		board of labour union and village heads around the company's operational areas. Based on the results of interviews obtained information that the employee recruitment process has been openly informed. The results of the recruitment procedure can be accessed by prospective employees and there is no charge for the whole process. This also applies to the recruitment of SIPEF estate security services conducted by PT Safeguarding Solution Indonesia (SSI).	
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.	Certificate holder has had annual internal audit program to monitor and to ensure operational activity align with the company's procedures. Furthermore, the internal audit also ensuring all business activity are comply with SIPEF ethics policy.	Comply
<b>Principle 2: Operate legally and respect rights</b>			
Implement legal requirements as the basic principles of operation in any jurisdiction.			
<b>Criteria 2.1</b>			
There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	<b>(C)</b> The unit of certification complies with applicable legal requirements.	<p>Unit of Certification prepared and maintained a list of legal requirement as per describe in "Daftar Peraturan Perundangan Indonesia yang Berkaitan dengan Sistem Sustainability", update 2 March 2020. Updating of Law and Regulations conducted in monthly basis.</p> <p>As per Indonesia laws and regulations, mandatory of applicable legal requirement for Plantation Company are Deed of Establishment, Registration on Ministry of Law and Human Rights, Location Permit, Plantation Permit, Land Title and Environmental Impact Assessment or Permit.</p> <p>Perlabian Palm Oil Mill as certificate holder received FFB's certified from one legal entity with two supply bases of FFB. There are Perlabian Estate and Tolan Estate.</p> <p>All the FFB suppliers, including the Mill is complied with legal requirements. The compliances of legal requirement for certificate holder and its supply base as follow:</p> <p>PT. Tolan Tiga Indonesia</p> <ul style="list-style-type: none"> <li>• Changes Deed of Establishment: No. 2 by Notary Lince Hutahayan, SH, dated 6 January 2017.</li> <li>• Plantation Permit: "Surat Pendaftaran Usaha Perkebunan No.213/Menhutbun-VII/2000" dated 10 March 2000. Covering area: 8,479.06 Ha and Mill capacity 75 MT FFB/hour.</li> </ul>	Comply

		<ul style="list-style-type: none"> <li>Land title: HGU Certificate #2 dated 17 September 1997, land title area permitted is 6,042.44 Ha and 2,436.62 Ha.</li> </ul> <p>PT Tolan Tiga Indonesia has shown the copies of legal requirement.          The comprehensive list of international, national, sub-national and provincial laws, which details the requirements of specific to the mill and estate operations, including contractor activities has demonstrated during audit</p>	
2.1.2	<p>A documented system for ensuring legal compliance is in place. This system has a means to track changes to the law and also includes listing and evidence of legal due diligence of all contracted third parties, recruitment agencies, service providers and labour contractors.</p>	<p>Unit of Certification has established documented system for ensuring legal compliance is in procedure of changing on laws and regulation as per mention in "Prosedur Informasi Perubahan Undang-Undang dan Peraturan Pemerintah" dated 1 November 2011.          To tracking for any changes of law and regulation, unit of certification has implement monitoring, evaluation and updating laws and regulations requirement. In example: document of "Pemantauan Penambahan atau Perubahan Undang-undang/Peraturan Tahun 2019" has monitored and updated in monthly basis.          Evidence of legal due diligence on these requirements are implemented in Contracted Third Parties Agreement, as sample below:          Perlabian Estate:          Contract/Working Agreement CV. Tua Gabe (FFB transporter), No. 13/RMO-PLE/TG/VII/2019 dated 1 July 2019. Within the contract in Article 5, the FFB transporter shall comply with Indonesia legal compliance such as providing Social Insurance (BPJS Ketenagakerjaan), Health Insurance (BPJS Kesehatan), Taxes, Minimum Wage, Not Employed Under 18 y.o. and PPE usage.          Perlabian POM:          Working Agreement No. 18/RMO-PLE/JR/X/2019, dated 1 October 2019. Agreement between PT. Tolan Tiga Indonesia – Perlabian Mill and UD. Juir for job Fiber Transportation from Perlabian POM. Within the agreement, specific meeting applicable legal requirements are described in Article 3 (Taxes) and Article 7 (Insurance and OHS).          Within these working contract, legal requirement on manpower regulation has been mentioned in several Article such as Article 4, Article 5, Article 6, Article 7 and Article 8.</p> <p>All employees of contractors are provided with wage slips to indicate their actual earnings</p>	Comply



		and deductions.	
2.1.3	Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.	There were 86 HGU boundary poles in Tolan Estate. Tolan Estate monitored the condition of each boundary poles on monthly basis. It is clearly seen that boundary pegs are visibly maintained and no planting beyond these legal boundaries within this certification scope.	Comply
<b>Criteria 2.2</b>			
All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.			
2.2.1	A list of contracted parties is maintained.	Unit of Certification has list of contracted parties in each unit. All the list is well maintained. Sample taken as below: Perlabian Estate: based on list of stakeholder Perlabian Estate updated on 9 January 2020, there are five (5) contractors. Perlabian POM: based on list of stakeholder Perlabian POM updated on 7 February 2020, there are six (6) contractor and two (2) supplier as third parties.	Comply
2.2.2	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.	Evidence of legal due diligence on these requirements are implemented in Contracted Third Parties Agreement, as sample below: Perlabian Estate: Contract/Working Agreement CV. Tua Gabe (FFB transporter), No. 13/RMO-PLE/TG/VII/2019 dated 1 July 2019. Within the contract in Article 6, the FFB transporter shall comply with Indonesia legal compliance such as providing Social Insurance (BPJS Ketenagakerjaan), Health Insurance (BPJS Kesehatan), Taxes, Minimum Wage, Not Employed Under 18 y.o. and PPE usage. Also, socialization of Suppliers Integrity has been conducted on 24 February 2020. Perlabian POM: Working Agreement No. 20/PLM-HO/EDM/2019, dated 15 April 2019. Agreement between PT. Tolan Tiga Indonesia and CV. Torgamba Karya for job Waste Water Treatment Construction at Perlabian POM. Within the agreement, specific meeting applicable legal requirements are described in Article 3 (Taxes) and Article 7 (Insurance, Occupational Health & Safety, and Disallowing Child Labour).	Comply
2.2.3	All contracts, including those for FFB supply, contain clauses disallowing child, forced and	Evidence of legal due diligence on these requirements are implemented in Contracted Third Parties Agreement, as sample below:	Comply

	<p>trafficked labour. Where young workers are employed, the contracts include a clause for their protection.</p>	<p>Perlabian Estate: Contract/Working Agreement CV. Tua Gabe (FFB transporter), No. 13/RMO- PLE/TG/VII/2019 dated 1 July 2019. Within the contract in Article 6, the FFB transporter shall comply with Indonesia legal compliance such as providing Social Insurance (BPJS Ketenagakerjaan), Health Insurance (BPJS Kesehatan), Taxes, Minimum Wage, Not Employed Under 18 y.o. and PPE usage. Also, socialization of Suppliers Integrity has been conducted on 24 February 2020. Statement letter No: 04/BCD-EX/I/2020, dated 3 January 2020 made by CV. Biring Ndu Cahaya Panglong described a commitment to "No force labour and human trafficking; No corruption, fraud and thievery; Following all requirements under RSPO Supply Chain; Shall be audited by Certification Body. Perlabian POM: Working Agreement No. 20/PLM-HO/EDM/2019, dated 15 April 2019. Agreement between PT. Tolan Tiga Indonesia and CV. Torgamba Karya for job Waste Water Treatment Construction at Perlabian POM. Within the agreement, specific meeting applicable legal requirements are described in Article 5 (Taxes, Insurance, Occupational Health &amp; Safety, Minimum Wage Payment, Disallowing Child Labour Policy and Prevention of Sexual Harassment Policy).</p>																			
<p><b>Criteria 2.3</b> All FFB supplies from outside the unit of certification are from legal sources.</p>																					
<p>2.3.1</p>	<p><b>(C)</b> For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> <li>• Information on geo-location of FFB origins</li> <li>• Proof of the ownership status or the right/claim to the land by the grower/smallholder</li> <li>• Where applicable, valid planting/operating/trading license, or is part of a cooperative which allows the buying and selling of FFB</li> </ul>	<p>Perlabian POM receives directly FFB's from their own estates. Supply base of Bukit Maradja POM as below:</p> <table border="1" data-bbox="913 1075 1975 1353"> <thead> <tr> <th>No</th> <th>Estate</th> <th>Company</th> <th>Geo-Location GPS Coordinates</th> <th>Land Title #</th> <th>Area (Ha)</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Perlabian Estate</td> <td>PT. Tolan Tiga Indonesia</td> <td>2° 3' 37.60" N 100° 4' 52.40" E</td> <td>HGU Certificate #2 Year 1997, dated 17 Sep 1997</td> <td>6,042.44</td> </tr> <tr> <td>2</td> <td>Tolan Estate</td> <td>PT. Tolan Tiga Indonesia</td> <td>2° 0' 11.78" N 100° 2' 30.66" E</td> <td>HGU Certificate #2 Year 1997, dated 17 Sep 1997</td> <td>2,436.62</td> </tr> </tbody> </table>	No	Estate	Company	Geo-Location GPS Coordinates	Land Title #	Area (Ha)	1	Perlabian Estate	PT. Tolan Tiga Indonesia	2° 3' 37.60" N 100° 4' 52.40" E	HGU Certificate #2 Year 1997, dated 17 Sep 1997	6,042.44	2	Tolan Estate	PT. Tolan Tiga Indonesia	2° 0' 11.78" N 100° 2' 30.66" E	HGU Certificate #2 Year 1997, dated 17 Sep 1997	2,436.62	<p>Comply</p>
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<p>2.3.2</p>	<p>For all indirectly sourced FFB, the unit of</p>	<p>Perlabian POM implementing Identity Preserved (IP) in their Supply Chain, meaning that</p>	<p>N/A</p>																		

	certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1.	all FFB's received is directly managed by Own Estates. There are no indirectly or third parties FFB's suppliers entering the Mill.																												
<b>PROCEDURAL NOTE:</b> For Implementation Procedure for 2.3.2 refer to Annex 4.																														
<b>Principle 3: Optimise productivity, efficiency, positive impact and resilience</b>																														
Implement plans, procedures and systems for continuous improvement.																														
<b>Criteria 3.1</b> There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.																														
3.1.1	<p><b>(C)</b> A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</p>	<p>The unit of certification has prepared a business plan for period 2020 – 2030. The business plan indicating the projected production of FFB, CPO and PK; cost of production, revenue and profit estimation. This projection include FFB receiving from the supply base Perlabian Estate and Tolan Estate.</p> <p>The unit of certification demonstrated independent financial audit report for from "Deloitte" as evidence in Summary of Principal Findings PT Tolan Tiga Indonesia – Perlabian POM For the Year Ended December 31<sup>st</sup>, 2019. The public accountant recommended that the company should install barcode or asset tag number so it will be easier to identify any fixed asset even by a new staff.</p> <p>Perlabian POM: company has business plan for period 2020-2030 including FFB receiving and processing.</p> <p>Sampled "Business Plan of FFB, CPO/PK, and Processing Cost 2020 – 2030": FFB</p> <table border="1" data-bbox="909 1145 1832 1378"> <thead> <tr> <th rowspan="2">Year</th> <th colspan="3">FFB (Ton)</th> </tr> <tr> <th>Perlabian Estate</th> <th>Tolan Estate</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>2020</td> <td>102,612</td> <td>98,533</td> <td>201,145</td> </tr> <tr> <td>2021</td> <td>100,359</td> <td>92,298</td> <td>192,657</td> </tr> <tr> <td>2022</td> <td>98,678</td> <td>87,621</td> <td>186,299</td> </tr> <tr> <td>2023</td> <td>99,422</td> <td>83,046</td> <td>182,468</td> </tr> <tr> <td>2024</td> <td>102,825</td> <td>79,600</td> <td>182,425</td> </tr> </tbody> </table>	Year	FFB (Ton)			Perlabian Estate	Tolan Estate	Total	2020	102,612	98,533	201,145	2021	100,359	92,298	192,657	2022	98,678	87,621	186,299	2023	99,422	83,046	182,468	2024	102,825	79,600	182,425	Comply
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3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available.	<p>The unit of certification has provided replanting program up to year 2030.</p> <p>Perlabian Estate:</p> <table border="1"> <thead> <tr> <th>Year</th> <th>Replanting (Ha)</th> <th>Remarks</th> </tr> </thead> <tbody> <tr><td>2020</td><td>Nil</td><td></td></tr> <tr><td>2021</td><td>328.08</td><td>OP 1993, 1996, 2003</td></tr> <tr><td>2022</td><td>350.27</td><td>OP 1992, 1994, 1996, 2003</td></tr> </tbody> </table>	Year	Replanting (Ha)	Remarks	2020	Nil		2021	328.08	OP 1993, 1996, 2003	2022	350.27	OP 1992, 1994, 1996, 2003	Comply																																																																												
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2023	220.71	OP 1995, 1993
2024	190.52	OP 1995
2025	Nil	
2026	Nil	
2027	Nil	
2028	Nil	
2029	Nil	
2030	202.04	OP 2005

Tolan Estate:

Year	Replanting (Ha)	Remarks
2020	Nil	
2021	Nil	
2022	Nil	
2023	173.33	OP 1994
2024	167.61	OP 1994
2025	161.96	OP 1996
2026	178.91	OP 1997
2027	426.04	OP 1998
2028	369.95	OP 1999
2029	302.40	OP 2000
2030	296.04	OP 2001

Review of replanting progress conducted annually during management review. Prior to land preparation on the replanting area, a planting plan review must take place by ENC department. The planting plan review comprise of extensive document and field check: summary of plans – stating the area is suitable for intended land use; general map of management unit; map of area intended for replanting; soil maps; peat depth map (if applicable); peat drainability assessment (if applicable); topography map; slope class

		<p>map; map of planned roads, bridges, culverts, etc; map of HCV/conservation area; planting material documentation; working schedule. The output is approval to continue the re-planting plan.</p> <p>Audit team noted dynamics in planned-for-replanting area. In 2019, the immature area was 519.13 Ha, whereby after replanting done in 2019, the additional re-planted area was 122.9 Ha (after RSPO annual surveillance 2018). The Infrastructure and others area was 271.31 Ha. In 2020 replanting was previously planned for 165.77 Ha of OP 1993 and 1996, however it was postponed to 2021 due to financial condition in oil palm industry.</p>	
3.1.3	<p>The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.</p>	<p>Each unit conducted Management Review. Latest Management Review in Perlavian POM conducted on 3 Mar 2020. Management review has discussed:</p> <ul style="list-style-type: none"> <li>• Results of internal audits; internal audit in Perlavian POM conducted on 13-14 Jan 2020, by ENC RMO NS Team, summary of finding and corrective action have been documented in Visit Report ENC Team. Such as: <ul style="list-style-type: none"> <li>○ No evidence of dissemination related code of conduct to employees and contractors recently. Action: conducted dissemination to employees and contractors related code of conduct. Status: has been done on 3 March 2020.</li> <li>○ Identification of training need was not found during audit. Action: establish document of training need identification and training program 2020. Status: training need identification and training program 2020 has been available in March 2020.</li> </ul> </li> <li>• Customer feedback; Based on review of customer feedback conducted by Marketing Department, there is no complaint related CPO and PK quality sold to buyer.</li> <li>• Process performance and product conformity. FFB processed in Perlavian POM are coming from owned estates under the same management (PT Tolan Tiga Indonesia); Processing in Perlavian POM were using Palm oil Mill procedure Part I, II and III.</li> <li>• Status of preventive and corrective actions. All finding discussed in this Management Review have been closed and attached in the minutes of management review. Evidence of verification and closure were kept by Perlavian POM.</li> <li>• Follow-up actions from management reviews. Result of previous management review were discussed, mostly regarding performance, target achievement and FFB quality</li> </ul>	Comply

		<ul style="list-style-type: none"> <li>• Changes that could affect the management system. There is SOP revision related FFB Grading LAB-01-10/15-02-2019/Rev.2 addition in Sortation Specificatio Process, LAB-01-10-SPEC-01.</li> <li>• Recommendations for improvement. Follow up action from internal audit are keep implemented consistently, therefore not to be found during next internal or external audit.</li> </ul> <p>Latest Management Review in Perlavian Estate conducted on 7 Mar 2020. Management review has discussed:</p> <ul style="list-style-type: none"> <li>• Results of internal audits; internal audit in Perlavian Estate conducted on 10-13 Feb 2020, by ENC RMO NS Team, summary of finding and corrective action have been documented in Visit Report ENC Team. Such as:             <ul style="list-style-type: none"> <li>○ Document "Penilaian Usaha Perkebunan" No.188.45/85/HUTBUN/2016 has been expired on 4 Sep 2019. Action Plan: Communicate with RMO-NS related processing of the document on 2 Mar 2020; RMO-NS has communicate with "Dinas Pertanian" Labuhanbatu Selatan Regency to get information of schedule to conduct field verification to PT Tolan Tiga Indonesia. Status: Field verification by "Dinas Pertanian" Labuhanbatu Sleatan Regency will be conducted in April 2020.</li> <li>○ There are two welder in PLE which have expired certificate, however they are currently have letter from Manpower Office dated 28 Sep 2018 stating that the certificate is on process of extension. Action Plan: PLE has communicate with RMO-NS on 15 Nov 2019 and 22 Feb 2020 regarding extension of welder certificate.</li> </ul> </li> <li>• Customer feedback; there are customer feedback received from Perlavian POM related FFB quality.</li> <li>• Process performance and product conformity. Process of upkeep and harvesting following Oil Palm Agriculture Part 1 and Part 2; FFB quality following the SOP of Engineering Department, Manual Laboratory Independent, FFB grading procedure (Lab-01-10/15-02-2019/Rev.2).</li> <li>• Status of preventive and corrective actions. All action plan related to internal audit result have been followed up and reviewed during this Management Review, some findings still need further verification.</li> </ul>	
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		<ul style="list-style-type: none"> <li>• Follow-up actions from management reviews. Follow up of previous management review can be seen in status of preventive and corrective action from internal audit findings.</li> <li>• Changes that could affect the management system. There is change in FFB Grading Procedure (LAB-01/15-02-2019/Rev.2), addition in Specification Process (LAB-01-10-SPEC-01).</li> <li>• Recommendations for improvement. Next management review meeting recommended to include all operation unit in implementation of SCCS and ISO 9001, especially related to Best Agriculture Practice.</li> </ul> <p>Latest Management Review in Tolan Estate conducted on 2 Mar 2020. Management review has discussed:</p> <ul style="list-style-type: none"> <li>• Results of internal audits; internal audit in Tolan Estate conducted on 3-6 Feb 2020, by ENC RMO NS Team. Summary of finding and corrective action have been documented in Visit Report ENC Team. Such as:             <ul style="list-style-type: none"> <li>○ Report of Public Accountant related financial report was not available. Action Plan: Communicate with FAD Department on 2 Mar 2020 to deliver financial audit report. Status: need further verification.</li> <li>○ Document "Penilaian Usaha Perkebunan" No.188.45/85/HUTBUN/2016 has been expired on 4 Sep 2019. Action Plan: Communicate with RMO-NS related processing of the document on 2 Mar 2020; RMO-NS has communicate with "Dinas Pertanian" Labuhanbatu Selatan Regency to get information of schedule to conduct field verification to PT Tolan Tiga Indonesia. Status: Field verification by "Dinas Pertanian" Labuhanbatu Sleatan Regency will be conducted in April 2020.</li> </ul> </li> <li>• Customer feedback; there are customer feedback received from Perlabian POM related FFB quality.</li> <li>• Process performance and product conformity. Process of upkeep and harvesting following Oil Palm Agriculture Part 1 and Part 2; FFB quality following the SOP of Engineering Department, Manual Laboratory Independent, FFB grading procedure (Lab-01-10/15-02-2019/Rev.2).</li> <li>• Status of preventive and corrective actions. All action plan related to internal audit result have been followed up and reviewed during this Management Review, some</li> </ul>	
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		<p>findings still need further verification.</p> <ul style="list-style-type: none"> <li>• Follow-up actions from management reviews. Follow up of previous management review can be seen in status of preventive and corrective action from internal audit findings.</li> <li>• Changes that could affect the management system. There is change in FFB Grading Procedure (LAB-01/15-02-2019/Rev.2), addition in Specification Process (LAB-01-10-SPEC-01).</li> <li>• Recommendations for improvement. Next management review meeting recommended to include all operation unit in implementation of ISO 9001, especially related to Best Agriculture Practice.</li> </ul>	
<p><b>Criteria 3.2</b> The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.</p>			
<p>3.2.1</p>	<p><b>(C)</b> The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.</p>	<p>Internal audit in Perlabian POM has been conducted on 13-14 Jan 2020 by ENC Team RMO North Sumatera. Findings have been recorded, such as:</p> <ol style="list-style-type: none"> <li>1. No evidence of dissemination related code of conduct to employees and contractors recently. Action: conducted dissemination to employees and contractors related code of conduct. Status: has been done on 3 March 2020.</li> <li>2. Identification of training need was not found during audit. Action: establish document of training need identification and training program 2020. Status: training need identification and training program 2020 has been available in March 2020.</li> </ol> <p>Continuous improvement by Perlabian POM based on VPE (Vice President Engineering) visit on 10-11 Jul 2019:</p> <ol style="list-style-type: none"> <li>1. The feed pipe to all of the vibrating screens is not in the centre of the screen and also the weight are not set correctly to give the proper pattern. Status: already corrected on 28 Jul 2019.</li> <li>2. The new boiler ash conveyor for the 26t boiler should be stainless steel lined in the bottom. Status: ash scrapper for the boiler 26t has been installed stainless steel lined in the bottom on 28 Oct 2019.</li> <li>3. The 175 amp circuit breaker in the main switch board is no longer used and can be used to supply power to the new WTP upgrade, which is initially the lamella clarifier.</li> </ol>	<p>Comply</p>

		<p>Status: the 175 amp circuit breaker in the main switch board has been used to supply power to Lamella on 18 Nov 2019.</p> <p>Internal audit in Perlabian Estate has been conducted on 10-13 Feb 2020. Findings have been recorded, such as:</p> <ol style="list-style-type: none"> <li>1. Report of Public Accountant related financial report was not available. Action Plan: Communicate with FAD Department on 2 Mar 2020 to deliver financial audit report. Status: need further verification.</li> <li>2. Document "Penilaian Usaha Perkebunan" No.188.45/85/HUTBUN/2016 has been expired on 4 Sep 2019. Action Plan: Communicate with RMO-NS related processing of the document on 2 Mar 2020; RMO-NS has communicate with "Dinas Pertanian" Labuhanbatu Selatan Regency to get information of schedule to conduct field verification to PT Tolan Tiga Indonesia. Status: Field verification by "Dinas Pertanian" Labuhanbatu Sleatan Regency will be conducted in April 2020.</li> </ol> <p>Continuous improvement made by Perlabian Estate based on based on Regional Director ED Visit on 13-16 Oct 2019:</p> <ol style="list-style-type: none"> <li>1. SFM in conjunction with EM to produce short written assessment on the merits of chemical mixing system and forward to RD-NS &amp; RD-ED for discussion.</li> <li>2. EM to work with estate teams to review the "Kapasitas Rata-rata Harvester per Hari" records, identify harvesters with low productivity, confirm the reason and take necessary action to increase average productivity.</li> <li>3. Ensure that OER and FFA figures are regularly passed on to field staff / mandors to increase awareness of importance of their role in maintaining product quality and extraction target.</li> <li>4. Arrange for KTU to confirm reason for over expenditure in allocation from CWS.</li> </ol> <p>Internal audit in Tolan Estate has been conducted on 3-6 Feb 2020, by ENC RMO NS Team. Summary of finding and corrective action have been documented in Visit Report ENC Team. Such as:</p> <ul style="list-style-type: none"> <li>• Report of Public Accountant related financial report was not available. Action Plan: Communicate with FAD Department on 2 Mar 2020 to deliver financial audit report.</li> </ul>	
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		<p>Status: need further verification.</p> <ul style="list-style-type: none"> <li>Document "Penilaian Usaha Perkebunan" No.188.45/85/HUTBUN/2016 has been expired on 4 Sep 2019. Action Plan: Communicate with RMO-NS related processing of the document on 2 Mar 2020. Status: need further verification.</li> </ul> <p>Continuous improvement by Tolan Estate based on Regional Director ED Visit on 13-16 Oct 2019:</p> <ol style="list-style-type: none"> <li>Work with FAs and continue to target 3 rounds of harvesting per months and use daily crop forecast and loose fruit percentages to allocate employees to LFC to maintain productivity at or above 450 kg/man day.</li> <li>Work with FAs to ensure low producing harvester are identified, counselled and monitored for improvement.</li> <li>Liaise with CWS and arrange for 2013 &amp; 2014 FFB trucks with low availability figures to be checked more frequently in an attempt to increase availability.</li> </ol> <p>Continue trial work on Spray Pre Assessment for spot spraying and present results when ready.</p>	
3.2.2	As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template.	The company has reported Annual Communication of Progress (ACOP) 2019 to RSPO website under organization name SIPEF Group, membership number 1-0021-05-000-00. Based on the report, number of management units certified under RSPO P&C Certification are 9 units; total certified area 97,018 Ha. Scheme Smallholder FFB volume supplied that is certified are 243,571 tonnes. Total CSPO sold as RSPO-certified are 261,374 tonnes; CSPO sold under other certification schemes are 63,399 tonnes; CSPO sold as conventional are 12,880 tonnes; total CSPO are 337,653 tonnes. CSPK sold under RSPO certified are 53,902 tonnes; total CSPK are 53,902 tonnes.	Comply
<b>Criteria 3.3</b>			
Operating procedures are appropriately documented, consistently implemented and monitored.			
3.3.1	<b>(C)</b> Standard Operating Procedures (SOPs) for the unit of certification are in place.	<p>Estate:</p> <p>The procedures documented in "Oil Palm Agricultural Manual" (revised April 2019), where it contains all sub section of the process, such as: Nursery, land clearing, planting in peat soil and mineral soil with zero burning, planting legume cover crops, terracing, upkeep (fertilizer and pesticides, included safe working practices), water level management, riparian and watercourse management, harvesting, replanting and FFB transport.</p>	Comply

		<p>Documented SOP are as follows:</p> <ol style="list-style-type: none"> <li>1. OPM-01-00; dated 02/10/2017; Biology of Oil Palm.</li> <li>2. OPM-02-00; dated 02/10/2017; General Information: Oil Palm Nursery.</li> <li>3. OPM-02-01; dated 02/10/2017; Land Preparation of Oil Palm Nursery – Persiapan Lahan Pembibitan Kelapa Sawit</li> <li>4. OPM-02-02; dated 02/10/2017; Oil Palm Pre Nursery – Pre Nursery Kelapa Sawit.</li> <li>5. OPM-02-03; dated 02/10/2017; Oil Palm Main Nursery – Main Nursery Kelapa Sawit.</li> <li>6. OPM-03-01; dated 02/10/2017; Survey and Mapping – Survey dan Pemetaan.</li> <li>7. OPM-03-02; dated 02/10/2017; Land Clearing – Pembersihan Lahan.</li> <li>8. OPM-03-03; dated 06/02/2019; Land Preparation – Persiapan Lahan.</li> <li>9. OPM-03-04; dated 02/10/2017; Legume Cover Crop <i>Mucuna brachteata</i> – <i>Mucuna brachteata</i> Kacangan Penutup Tanah.</li> <li>10. OPM-03-05; dated 02/10/2017; Field Planting – Penanaman ke Lapangan.</li> <li>11. OPM-04-01; dated 02/10/2017; Palm Supplying – Penyisipan Tanaman.</li> <li>12. OPM-04-02; dated 02/10/2017; Thinning Out and Removing Plant – Penjarangan dan pembongkaran Tanaman.</li> <li>13. OPM-05-01; dated 06/02/2019; Ablation and Sanitation – Ablasi dan Sanitasi.</li> <li>14. OPM-05-02; dated 06/02/2019; Harvesting – Panen.</li> <li>15. OPM-05-03; dated 06/02/2019; FFB and LF Delivery – Pengiriman TBS dan Berondolan.</li> <li>16. OPM-05-04; dated 02/10/2017; Frond Pruning – Pemangkasan Pelepah.</li> <li>17. OPM-05-05; dated 16/02/2019; Black Bunch Count – Sensus Buah.</li> <li>18. OPM-05-06; dated 02/10/2017; <i>Elaeobius camerunicus</i> Management – Pengelolaan <i>Elaeobius camerunicus</i>.</li> <li>19. OPM-06-01; dated 02/10/2017; Inorganic Fertiliser – Pupuk Inorganik.</li> <li>20. OPM-06-02; dated 02/10/2017; Organic Fertiliser – Pupuk Organik</li> <li>21. OPM-06-03; dated 02/10/2017; LSU: Palm Marking – LSU: Penandaan Tanaman.</li> <li>22. OPM-06-04; dated 02/10/2017; Leaf Sampling Unit (LSU) and Rachis Sampling Unit (RSU) – Pengambilan Sampel.</li> <li>23. OPM-07-01; dated 06/02/2019; Detection and Census – Deteksi dan Sensus.</li> <li>24. OPM-07-02; dated 02/10/2017; Pest Control – Pengendalian Hama.</li> <li>25. OPM-07-03; dated 02/10/2017; Disease Control – Pengendalian Penyakit.</li> </ol>	
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		<p>26. OPM-07-04; dated 02/10/2017; Integrated Pest Management – Pengendalian Hama Terpadu.</p> <p>27. OPM-08-01; dated 06/02/2019; Weed Control – Pengendalian Gulma.</p> <p>28. OPM-09-01; dated 19/03/2019; Water management in Coastal Soil – Pengelolaan Air di Tanah Pesisir.</p> <p>29. OPM-09-02; dated 02/10/2017; Management of Riparian Area – Pengelolaan Riparian Area.</p> <p>30. OPM-09-03; dated 01/04/2019; The Use, Store and Discrad Pesticide – Penggunaan, Penyimpanan dan pemusnahan pestisida.</p> <p>31. OPM-10-01; dated 06/02/2019; Field Quality Control.</p> <p>Interviews with the employees indicate satisfactory level of understanding and implementation in relation to their respective job function.</p> <p>Palm Oil Mill:          Perlabian Palm Oil Mill has a set of procedure for processing of oil palm Fresh Frut Bunch into CPO and PK, under “Palm Oil Mill Manual” dated 25 March 2019. The procedures explains all activity from receiving FFB into dispatch of products; Such as:</p> <ol style="list-style-type: none"> <li>1. POM-01-02; Reception in Perlabian Palm Oil Mill.</li> <li>2. POM-02-02; Sterilizer in Perlabian Palm Oil Mill.</li> <li>3. POM-03-02; Threshing in Perlabian Palm Oil Mill.</li> <li>4. POM-04-02; Pressing in Perlabian Palm Oil Mill.</li> <li>5. POM-05-02; Clarification in Perlabian Palm Oil Mill.</li> <li>6. POM-06-02; Kernel Plant in Perlabian Palm Oil Mill.</li> <li>7. POM-07-02; Steam Plant in Perlabian Palm Oil Mill.</li> <li>8. POM-08-02; Power Plant in Perlabian Palm Oil Mill.</li> <li>9. POM-09-02; Water Treatment in Perlabian Palm Oil Mill.</li> <li>10. POM-10-02; Effluent Plant in Perlabian Palm Oil Mill.</li> <li>11. POM-11-02; Storage and Dispatch in Perlabian Palm Oil Mill.</li> <li>12. POM-12-02; Workshop in Perlabian Palm Oil Mill.</li> <li>13. POM-13-02; EFB Plant in Perlabian Palm Oil Mill.</li> <li>14. POM-14-02; Biogas Plant in Perlabian Palm Oil Mill.</li> </ol>	
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		<p>The procedures are supported by specific Work Instructions, e.g. as follows:</p> <ol style="list-style-type: none"> <li>1. POM-01-02-W01; Penimbangan Truk FFB dan Berondolan – Weighing FFB truck and loose fruit.</li> <li>2. POM-02-02-W01; Loading ramp, Pengisian FFB ke dalam Rebusan – Loading ramp, FFB loading into sterilizer;</li> <li>3. POM-02-02-W02; Pengoperasian Sterilizer – Operating Sterilizer;</li> <li>4. POM-03-02-W01; Pengoperasian Threshing Machine – Operating Threshing Machine.</li> <li>5. POM-04-02-W01; Pengoperasian Digester – Operating Digester.</li> <li>6. POM-04-02-W02; Pengoperasian Screw Press – Operating screw press.</li> <li>7. POM-04-02-W03; Sand Trap and Vibrating Screen.</li> <li>8. POM-04-02-W04; Pengoperasian Crude Oil Tank – Operating Crude Oil Tank.</li> <li>9. POM-05-02-W01; Pengoperasian Continuous Settling Tank – Operating Continuous Settling Tank.</li> <li>10. POM-05-02-W02; Pengoperasian Clean Oil Tank – Operating Clean Oil Tank.</li> <li>11. POM-05-02-W03; Pengoperasian Sludge Tank – Operating Sludge Tank.</li> <li>12. POM-05-02-W04; Pengoperasian Oil Purifier – Operating Oil Purifier.</li> <li>13. POM-05-02-W05; Pengoperasian Vacuum Drier – Operating Vacuum Drier.</li> <li>14. POM-05-02-W06; Pengoperasian Sludge Centrifuge – Operating Sludge Centrifuge.</li> <li>15. POM-06-02-W01; Operating Depericarper.</li> <li>16. POM-06-02-W02; Pengoperasian Ripple Mill – Operating Ripple Mill.</li> <li>17. POM-06-02-W03; Operating Claybath Separator.</li> <li>18. POM-06-02-W04; Pengoperasian Sawipack Stage 1 &amp; Stage 2 – Operating Sawipack to separate kernel and shell from cracked mixture from ripple mill, through dry separation.</li> <li>19. POM-06-02-W05; Pengoperasian Kernel Silo Drier – Operating Kernel Silo Drier to reduce moisture &lt; 7%.</li> <li>20. POM-06-02-W06; Pengoperasian Hydrocyclone – Operating Hydrocyclone to separate kernel and shell from sawipack through wet method;</li> <li>21. POM-07-02-W01; Operating Cation Exchanger.</li> <li>22. POM-07-02-W02; Operating Degasifier.</li> <li>23. POM-07-02-W03; Operating Anion Exchanger.</li> </ol>	
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		<p>24. POM-07-02-W06; Operating Thermal Deaerator.          25. POM-07-02-W07; Boiler (Mech 35 MT/hr).          26. POM-07-02-W08; Penanganan Gangguan Sumber Tidak Bergerak Steam Boiler – Handling disturbance from static Steam Boiler.          27. POM-08-02-W01; Operating Genset.          28. POM-09-02-W01; Operating Water Intake.          29. POM-11-02-W01; Pengoperasian CPO Storage Tank – Operating CPO Storage Tank.          30. POM-11-02-W02; Pengoperasian Kernel Bin Storage – Operating Kernel Bin Storage.          31. Analisa FFA CPO No.POM-WI/LAB/001 – Analysing CPO’s FFA;          32. Analisa FFA Kadar air untuk CPO dispatch No.POM-WI/LAB/002A – Analysing CPO’s moisture for CPO dispatch;          33. Analisa kadar kotoran dan kadar air untuk kernel dipatch No.POM-WI/LAB/005A – Analyzing dirt and moisture in kernel for dispatch;          34. Pengiriman CPO No.POM-WI/LAB/043 – Delivery of CPO;          35. Pengiriman Kernel No.POM-WI/LAB/044 – Delivery of Kernel;</p> <p>A set of work instruction for mill’s workshop, dated 28<sup>th</sup> June 2014; including use of welding equipments, cutting metal, operating lathe machine, operating drilling machine, operating portable grinding machine, operating and maintenance of smoke density meter.</p> <p>A set of work instruction for biogas plant, dated 30<sup>th</sup> August 2014; comprise of: filling in POME into screen chamber and oil grease skimmer, operating of equalization tank, operating of plate heat exchanger and cooling tower, operating of primary clarifier and sludge pit, operating buffer tank, operating anaerobic reactor, operating degassifier, operating Lamella clarifier, operating sludge sump, operating sludge decanter and operating retention pond.</p> <p>PT Tolan Tiga Indoensia has prepared OHS Procedure under document “Prosedur Keselamatan dan Kesehatan Kerja (K3)” No. SOP/TDI/06, rev.01 dated 1 February 2019. The procedure including work permit and use of PPE</p>	
3.3.2	A mechanism to check consistent implementation	The company has established mechanism to check consistent implementation of	

	<p>of procedures is in place.</p>	<p>procedures under SOP OPM-10-01; dated 06/02/2019; Field Quality Control. The objectives of the procedure are to check if the result of work are in accordance with existing procedures; to evaluate the work and keep in accordance with the standards; to use as a reference for making improvements. Inspections are carried out on items related to harvesting, weeding, manuring, pest and disease, replanting and nursery.</p>	
<p>3.3.3</p>	<p>Records of monitoring and any actions taken are maintained and available.</p>	<p>Record of monitoring in Perlabian POM are available under documents Action Plan Perlabian POM as result Vice President Engineering visit (VPE). Description of monitoring result and action plan based on visit 10-11 Jul 2019 are as follows:</p> <ol style="list-style-type: none"> <li>1. The feed pipe to all of the vibrating screens is not in the centre of the screen and also the weight are not set correctly to give the proper pattern. Status: already corrected on 28 Jul 2019.</li> <li>2. The new boiler ash conveyor for the 26t boiler should be stainless steel lined in the bottom. Status: ash scrapper for the boiler 26t has been installed stainless steel lined in the bottom on 28 Oct 2019.</li> <li>3. The 175 amp circuit breaker in the main switch board is no longer used and can be used to supply power to the new WTP upgrade, which is initially the lamella clarifier. Status: the 175 amp circuit breaker in the main switch board has been used to supply power to Lamella on 18 Nov 2019.</li> </ol> <p>Record of operation monitoring and action taken in Perlabian Estate based on Regional Director ED Visit on 13-16 Oct 2019:</p> <ol style="list-style-type: none"> <li>1. SFM in conjunction with EM to produce short written assessment on the merits of chemical mixing system and forward to RD-NS &amp; RD-ED for discussion.</li> <li>2. EM to work with estate teams to review the "Kapasitas Rata-rata Harvester per Hari" records, identify harvesters with low productivity, confirm the reason and take necessary action to increase average productivity.</li> <li>3. Ensure that OER and FFA figures are regularly passed on to field staff / mandors to increase awareness of importance of their role in maintaining product quality and extraction target.</li> <li>4. Arrange for KTU to confirm reason for over expenditure in allocation from CWS.</li> </ol> <p>Record of operation monitoring and action taken in Tolan Estate:</p>	<p>Comply</p>



		<ol style="list-style-type: none"> <li>1. Harvesting: ripeness criteria of FFB that stated 8-10 loose fruit in circle has been comply to the harvesting criteria, resulted 3% under ripe FFB and increase normal ripe to &gt;90%; Increase productivity of loose fruit by 2 %. Action Plan: Conduct briefing to supervisor and harvester related harvesting criteria; consistency of loose fruit picker to date December is 9.56%.</li> <li>2. Pest &amp; Disease: keep focus on P&amp;D work to ensure that respond from census interval day by treatment &lt;3 days from census. Action Plan: keep respond &lt;3 days from census.</li> <li>3. Spraying: found that two spraying operator have swing the stick of SA15 in the young palm. Action Plan: ensure that all spraying operator have been re-trained and conducted competency assessment.</li> <li>4. Gang harvesting collection Div 1.</li> <li>5. Daily Crop Harvester: e.g. dated 13 Mar 2020, described activity: <ul style="list-style-type: none"> <li>• Harvesting Block: 06C02A; 06C04 and 11B03A;</li> <li>• Harvesting area: 32.70 Ha; 5 Ha; 37.24 Ha;</li> <li>• Number of worker: 15 harvester;</li> <li>• Results: 792 bunches; 73 bunches; 1564 bunches.</li> </ul> </li> </ol>	
<p><b>Criteria 3.4</b>  A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.</p>			
<p>3.4.1</p>	<p><b>(C)</b> In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/outgrower scheme, is documented.</p>	<p>PT. Tolan Tiga Indonesia has shown the environmental document (environmental permit), under:</p> <ul style="list-style-type: none"> <li>• AMDAL document is available and approved by Agriculture Ministry No.PEL.No.RC.220/472/B/III/1994, dated 17 March 1994. The impact assessment for Perlavian mill and its supply base was "Revisi Dokumen Rencana Pengelolaan Lingkungan (RKL) dan Rencana Pemantauan Lingkungan (RPL)" approved by "Surat Kepala Badan Pengendalian Dampak Lingkungan Daerah (Bapedalda) Kabupaten Labuhan Batu No.660/326/BPDL-LB/Set/2006" dated 21 July 2006. All environmental impact assessments have been carried when and where appropriate. Records of all impact assessments carried out are readily available. All operational areas have undertaken reviews of the environmental impacts on at least an annual basis.</li> <li>• Addendum to the initial environmental document: "Addendum ANDAL, RKL-RPL,</li> </ul>	<p>Comply</p>

		<p>Perkebunan Kelapa Sawit, Pabrik Kelapa Sawit, Pabrik Kernel Crushing Plant (KCP) 20 ton/jam dan Pengolahan Limbah Cair PKS menjadi Biogas untuk Pembangkit Listrik (+/- 3 MW) PT. Tolan Tiga Indonesia di Desa Perkebunan Perlavian, Kecamatan Kampung Rakyat, Kabupten Labuhanbatu Selatan, Propinsi Sumatera Utara”, approved through letter “Keputusan Badan Lingkungan Hidup Kabupaten Labuhanbatu Selatan No.660/55/BLH/2/2016”, dated 16 November 2016.</p> <ul style="list-style-type: none"> <li>• “Izin Lingkungan Perkebunan Kelapa Sawit, Parbrik Kelapa Sawit, Pabrik Kernel Crushing Plant (KCP) 20 Ton/Jam dan Pengolahan Limbah Cair PKS menjadi Biogas untuk Pembangkit Listrik (+/- 3 MW) PT. Tolan Tiga Indonesia No. 503/981/BPPTPMLS.1/2016”.</li> </ul> <p>The environmental impact, both positive and negative impact were measured to mitigate the negative impact and increasing the positive impact, e.g.</p> <ul style="list-style-type: none"> <li>• Air quality management: installation of dust collector, machinery service and maintenance, planting trees, road maintenance, all worker using earplug.</li> <li>• Water quality: waste water management, Clean Development Mechanism (biogas plant) project, Land Application.</li> <li>• Biodiversity: maintenance of sign board of HCV area, maintenance of HCV boundary, planting trees, patrol in HCV area.</li> <li>• Economic wellbeing in the region: Community Development.</li> </ul> <p>Job opportunity: for local communities, etc.</p>	
3.4.2	<p>For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.</p>	<p>PT. Tolan Tiga Indoneisa has prepared report on Environmental Management and Monitoring implementation (Laporan RKL-RPL) and submit to the government regularly (per semester), e.g RKL-RPL report semester I &amp; II 2019 as per document “Laporan Pelaksanaan Rencana pengelolaan Lingkungan Hidup (RKL) dan Rencana Pemantauan Lingkungan Hidup (RPL) semester I &amp; II tahun 2019”.</p> <p>PT. Tolan Tiga Indonesia has also appointed the Estate Manager – POM Manager who responsible on implementation of the environmental management and monitoring plan, as mentioned in Job description, point 12. Responsible on implementation of sustainability system and the other applicable requirement in the organization.</p> <p>The evidence of report submission to related environmental agency as follow:</p> <ol style="list-style-type: none"> <li>1. Environmental Report of “Laporan Pelaksanaan UKL UPL PT. Tolan Tiga Indonesia</li> </ol>	Comply

		<p>Semester I tahun 2019” has been submitted to Environmental Department of Regency level “DLH Kab. Labuhanbatu Selatan” (dated 31 July 2019), Provincial level “DLH Provinsi Sumatera Utara” (dated 31 July 2019), and Ministry of Environmental and Forestry “Kementerian Lingkungan Hidup (ID SIMPEL: 1581322904-2171) dated 13 September 2019.</p> <p>2. Environmental Report of “Laporan Pelaksanaan UKL UPL PT. Tolan Tiga Indonesia Semester II tahun 2019” has been submitted to Environmental Department of Regency level “DLH Kab. Labuhanbatu Selatan” (dated 13 March 2020), Provincial level “DLH Provinsi Sumatera Utara” (dated 13 March 2020), and Ministry of Environmental and Forestry “Kementerian Lingkungan Hidup (ID SIMPEL: 1581322904-2171) dated 10 February 2020.</p>																																																																																																			
<p>3.4.3</p>	<p><b>(C)</b> The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p>	<p>The social and environmental management and monitoring plan of PT. Tolan Tiga Indonesia is implemented according to Environmental Document Directive, such as monitoring on air quality from mill activity, as below:</p> <table border="1" data-bbox="913 815 1845 1386"> <thead> <tr> <th>Parameter</th> <th>Unit</th> <th>Emission Chimney Genset No.01</th> <th>Emission Chimney Genset No.02</th> <th>Emission Chimney Genset No.03</th> <th>Emission Chimney Genset No.04</th> <th>Threshold</th> </tr> </thead> <tbody> <tr> <td colspan="7">Semester I - 2019</td> </tr> <tr> <td>NO<sub>2</sub></td> <td>mg/Nm<sup>3</sup></td> <td>118.03</td> <td>110.56</td> <td>-</td> <td>119.55</td> <td>1,000</td> </tr> <tr> <td>SO<sub>2</sub></td> <td>mg/Nm<sup>3</sup></td> <td>6.10</td> <td>4.49</td> <td>-</td> <td>5.67</td> <td>800</td> </tr> <tr> <td>CO</td> <td>mg/Nm<sup>3</sup></td> <td>54.01</td> <td>53.11</td> <td>-</td> <td>60.06</td> <td>600</td> </tr> <tr> <td>Total Particulate</td> <td>mg/Nm<sup>3</sup></td> <td>86.71</td> <td>81.55</td> <td>-</td> <td>86.12</td> <td>150</td> </tr> <tr> <td>Opacity</td> <td>%</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>CO<sub>2</sub></td> <td>%</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td colspan="7">Semester II - 2019</td> </tr> <tr> <td>NO<sub>2</sub></td> <td>mg/Nm<sup>3</sup></td> <td>144.72</td> <td>98.53</td> <td>114.32</td> <td></td> <td>1,000</td> </tr> <tr> <td>SO<sub>2</sub></td> <td>mg/Nm<sup>3</sup></td> <td>&lt; 2.62</td> <td>&lt; 2.62</td> <td>&lt; 2.62</td> <td></td> <td>800</td> </tr> <tr> <td>CO</td> <td>mg/Nm<sup>3</sup></td> <td>184.2</td> <td>206.73</td> <td>298.53</td> <td></td> <td>600</td> </tr> <tr> <td>Total Particulate</td> <td>mg/Nm<sup>3</sup></td> <td>32.09</td> <td>31.53</td> <td>35.67</td> <td></td> <td>150</td> </tr> <tr> <td>Opacity</td> <td>%</td> <td>&lt;20</td> <td>&lt;20</td> <td>&lt;20</td> <td></td> <td></td> </tr> </tbody> </table>	Parameter	Unit	Emission Chimney Genset No.01	Emission Chimney Genset No.02	Emission Chimney Genset No.03	Emission Chimney Genset No.04	Threshold	Semester I - 2019							NO <sub>2</sub>	mg/Nm <sup>3</sup>	118.03	110.56	-	119.55	1,000	SO <sub>2</sub>	mg/Nm <sup>3</sup>	6.10	4.49	-	5.67	800	CO	mg/Nm <sup>3</sup>	54.01	53.11	-	60.06	600	Total Particulate	mg/Nm <sup>3</sup>	86.71	81.55	-	86.12	150	Opacity	%						CO <sub>2</sub>	%						Semester II - 2019							NO <sub>2</sub>	mg/Nm <sup>3</sup>	144.72	98.53	114.32		1,000	SO <sub>2</sub>	mg/Nm <sup>3</sup>	< 2.62	< 2.62	< 2.62		800	CO	mg/Nm <sup>3</sup>	184.2	206.73	298.53		600	Total Particulate	mg/Nm <sup>3</sup>	32.09	31.53	35.67		150	Opacity	%	<20	<20	<20			<p>Comply</p>
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		CO <sub>2</sub>	%	6.83	6.28	5.80			
		Reviewed and updated regularly per semester (6 month basis) and reported to Environmental Agency.							
<b>Criteria 3.5</b>									
A system for managing human resources is in place.									
3.5.1	Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives.	<p>PT Tolan Tiga Indonesia has had guidance on human resources management in document "Human Resources Department Manual" that approved by top management (Principal Director) since 5 April 2019. The manual covering procedure such as:</p> <ol style="list-style-type: none"> <li>1. General (HRD-00-01)</li> <li>2. Organization Chart (HRD-00-02)</li> <li>3. Objective and KPI (HRD-00-03)</li> <li>4. Risk and Opportunities (HRD-00-04)</li> <li>5. Recruitment in General (HRD-01-00)</li> <li>6. Internal Recruitment (HRD-01-01) <ul style="list-style-type: none"> <li>o Operating unit set Staff Employment Request and asked approval from GM/RD.</li> <li>o Estate managers choose the best candidates from SKU to be recruited as staff. Selected candidates will participate in the selection by the training manager. Furthermore, candidates will follow the OJT for 6 months. Then GM / RD will provide an assessment of whether the candidate is eligible / not.</li> </ul> </li> <li>7. External Recruitment (HRD-01-02) <ul style="list-style-type: none"> <li>o The RMO / Head Department prepares SERs that are needed for HO, estate or mill.</li> <li>o Publish job advertisements.</li> <li>o Selection process (written test, psychological test, interview and health test).</li> <li>o Negotiations and contracts</li> <li>o Signing contracts</li> <li>o Probation period 3 months.</li> <li>o Graduation assessment by estate / mill manager.</li> </ul> </li> <li>8. Recruitment for PKWT (HRD-01-03)</li> <li>9. Training General Information (HRD-02-00)</li> </ol>							Comply

		<ul style="list-style-type: none"> <li>○ Identify training needs</li> <li>○ Plan and choose a training method</li> <li>○ Delivery of training</li> <li>○ Documentation and evaluation</li> <li>10. Training for Trainee Assistant (HRD-02-01)</li> <li>11. Training Evaluation (HRD-02-02)</li> <li>12. Annual Training Budgeting (HRD-02-03)             <ul style="list-style-type: none"> <li>○ Training managers collect data on specific training needs from each department.</li> <li>○ Training manager sends training program proposals to HRD managers.</li> <li>○ The Principal Director approves / rejects the annual activity planning and training budget.</li> </ul> </li> <li>13. Training/Seminar/Workshop/Request (HRD-02-04)</li> <li>14. Training Carried by OU (HRD-02-05)             <ul style="list-style-type: none"> <li>○ Training manager distributed curriculum to OU's which will be basis of their annual training schedule.</li> <li>○ Estate manager create annual training schedule for the trainings that are required by their estate employees.</li> <li>○ Training manager compile annual training scheduled from each OU and create brief summary of the training needs of each OU for that year.</li> <li>○ Appointed assistant for each OU's will proceed with training activities on the annual training schedule and reported the training report to the training manager.</li> </ul> </li> <li>15. Training Carried by STC (HRD-02-06)</li> <li>16. Training curriculum (HRD-02-07)</li> <li>17. Staff Benefit Education, Leave and House Allowance (HRD-03-01)</li> <li>18. Payroll (HRD-03-02)</li> <li>19. Staff Appraisal (HRD-03-03)</li> <li>20. Pension Reserves (HRD-03-04)</li> <li>21. Internal Grievance (HRD-04-01)</li> <li>22. External Grievance (HRD-04-02)</li> <li>23. Disciplinary Action (HRD-04-03)</li> <li>24. Staff Resignation (HRD-04-04)</li> <li>25. Staff Retirement (HRD-04-05)</li> </ul>	
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3.5.2	Employment procedures are implemented and records are maintained.	Based on document verification in each units obtained information that each employee had a personal file that collect all information since the employee's join SIPEF Group. The document consist of employee's profile, annual appraisal record, promotion record (if any), warning letter (if any) and other document related to his/her employment data. All document are in places and kept by head clerks in each units.	Comply

<b>Criteria 3.6</b> An Occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	<b>(C)</b> All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.	<p>PT Tolan Tiga Indonesia has prepared the procedure of risk assessment as per Procedure of Hazard Identification Risk Analysis and Determining Control of OHS, No.OHS-01-01/04-02-2019/Rev.0, dated 12 March 2019.</p> <p>Perlabian POM - The document of risk assessment under "Penilaian Resiko", last review on 18<sup>th</sup> February 2020, the document was covered all activities in mill, such as: security, weight bridge, loading ramp, transfer carriage, station capstan before sterilizer, sterilizer, capstan after sterilizer, hoisting crane, pressing station, clarification station, kernel plant, dispatch CPO/ PK, water treatment, boiler, engine room, workshop, go-down, office, effluent, bunker filling, control room, telescopic handler, wheel loader, emplacement.</p> <p>Tolan Estate -The document of risk assessment under "Penilaian Resiko", last review on 2<sup>nd</sup> March 2020, the document was covered all activities in estate, such as: spraying, manuring, office activity, workshop, harvesting, pruning, - transport TBS.</p> <p>All of the mitigation plan of risk assessment has implemented, e.g: in warehouse of fertilizer has sets the maximum height at 2.5 meters for fertilizer bag stacking, fire extinguisher has instaled in fuel station and temporarty hazardous waste, and all of the workers has provided PPE.</p>	Comply
3.6.2	<b>(C)</b> The effectiveness of the H&S plan to address health and safety risks to people is monitored.	<p>PT Tolan Tiga Indonesia have established an Occupational Health and Safety Policy that was signed by President Director dated 27<sup>th</sup> March 2019, no Dok: QMM-40-01-P04/27-03/2019/Rev. In point 1 was mentioned The company support the implementation of all relevant laws and regulation of Republic of Indonesia ad of applicable international agreement and standards relevant to occupational health and safety and at point 2.b mentioned that the company committed to provision of adequate resources for effective implementation of the occupational health and safety (OHS) program and procedure, including strict compliance reviews.</p> <p>OHS Procedure under document "Prosedur Keselamatan dan Kesehatan Kerja (K3)" No. SOP/TDI/06, rev.01 dated 1 February 2019. The document of procedure consisted of:</p> <ul style="list-style-type: none"> <li>• Procedure of Hazard Identification Risk Analysis Determining Control for OHS – No:</li> </ul>	Comply

		<p>OHS-01-01</p> <ul style="list-style-type: none"> <li>• Procedure of Hot Work – No: OHS-01-02</li> <li>• Procedure of Potential Hazard Report – No: OHS-01-03</li> <li>• Procedure of P3K (First Aid) – No: OHS-01-04</li> <li>• Procedure of Confined Space - No: OHS-01-06</li> <li>• Procedure of Working at Heights – No: OHS-01-06</li> <li>• Procedure of Gas Pressure Management - No: OHS-01-07</li> <li>• Procedure of Incident Reporting - No: OHS-01-08</li> <li>• Procedure of Standard for Installation of Safety Sign - No: OHS-01-09</li> <li>• Procedure of Personal Protective Equipment - No: OHS-01-10</li> </ul> <p>OHS Program was demonstrated under “Program P2K3 year 2020”, updated on 10<sup>th</sup> January 2020, such as:</p> <ul style="list-style-type: none"> <li>• Meeting of OHS committee (monthly)</li> <li>• Report of OHS performance (3 monthly base)</li> <li>• Fire Drill (Bakartiba)</li> <li>• Fire extinguisher inspection (monthly)</li> <li>• Training for first aider</li> <li>• Training on handling pesticides</li> <li>• Socialization of company policies</li> <li>• Training of PPE for all workers</li> <li>• Medical Check-up test</li> <li>• Monitoring of environmental requirement (water quality, air emission)</li> </ul> <p>Record of implementation the OHS plan year 2019 and 2020, such:</p> <ul style="list-style-type: none"> <li>• Monitoring of OHS equipment, e.g: 6<sup>th</sup> January 2020, 5<sup>th</sup> February 2020 for fire extinguisher in Perlabian Office (registration number: 012); reported OK</li> <li>• Fire drill dated 27<sup>th</sup> January 2020, location in Perlabian POM. Date verified: attendance list, photograph, scenario, evaluation of fire drill.</li> <li>• Training for first aider, dated 27<sup>th</sup> January 2020, trainer: paramedical, was attended by 98 workers.</li> <li>• Monitoring of first aider in Mill laboratory on 2<sup>nd</sup> March 2020, result OK</li> </ul>	
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		<ul style="list-style-type: none"> <li>• Monitoring of fire hydrant (monthly), dated 2<sup>nd</sup> March 2020, result OK</li> <li>• Refresh training/socialization on using of PPE dated 4<sup>th</sup> March 2020 for processing workers in Perlabian POM.</li> <li>• Special Medical Check-up for worker in high risk area in Perlabian POM (annually), last MCU on 2<sup>nd</sup> October 2019 – was attended by 42 workers, conducted by Klinik Anugerah Ibu. Data verified: Report of MCU and attendance list on socialization the MCU result for all workers (dated 4<sup>th</sup> March 2020).</li> <li>• Minute of OHS meeting (monthly), last meeting conducted on 20<sup>th</sup> February 2020. Agenda: review on progress action from previous OHS meeting, review of OHS inspection report and accidents.</li> <li>• Report of OHS performance for period October - December 2019 was sent to Manpower Agency in Labuhanbatu Selatan Regency, dated 12<sup>th</sup> March 2020.</li> <li>• Based on field visit the OHS program has implemented in all of operation units.</li> <li>• Noise level monitoring is done at the Perlabian POM. The latest noise level monitoring conducted on 29<sup>th</sup> and 30<sup>th</sup> October 2019, based on analysis result No.326.e/LHU/2019 dated 14 Nov 2019 issued by KAN accredited laboratory PT Itec Solution Indonesia.</li> </ul>	
<p><b>Criteria 3.7</b>  All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.</p>			
<p>3.7.1</p>	<p><b>(C)</b> A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and outgrowers, taking into account gender-specific needs, and which covers applicable aspects of the RSPO P&amp;C, in a form they understand, and which includes assessments of training.</p>	<p>PT Tolan Tiga Indonesia has prepared the program of training year 2020, such as:</p> <ul style="list-style-type: none"> <li>• Training for operator in loading ramp</li> <li>• Training for operator in sterilizer station</li> <li>• Training for MSDS</li> <li>• Training on operation in water management plan</li> <li>• Training of emergency response procedure</li> <li>• Training for biogas plant</li> <li>• Training for harvesting, planned January 2020</li> <li>• Training on calibration of nozzle (spraying equipment), planned in Jnauary 2020</li> <li>• Training on fertilizer application, planned in January 2020</li> <li>• Training on management of hazardous waste, planned in February 2020</li> <li>• Training of traceability of RSPO, planned in February 2020</li> </ul>	<p>Comply</p>

		<ul style="list-style-type: none"> <li>• Training for spraying applicator (including for OHS training and environment) and Calibration for Spraying equipment</li> <li>• Training for LSU (leaf sampling unit)</li> </ul> <p>Training records, e.:</p> <ul style="list-style-type: none"> <li>• Fire drill dated 27<sup>th</sup> January 2020, location in Perlabian POM. Date verified: attendance list, photograph, scenario, evaluation of fire drill.</li> <li>• Training for first aider, dated 27<sup>th</sup> January 2020, trainer: paramedical, was attended by 98 workers.</li> <li>• Refresh training/socialization on using of PPE dated 4<sup>th</sup> March 2020 for processing workers in Perlabian POM.</li> <li>• Training for MSDS dated 7<sup>th</sup> February 2020 – was attended by 3 workers in WTP station.</li> <li>• Training for operator in loading ramp dated 8<sup>th</sup> July 2019, was attended by 6 workers</li> <li>• Training for operator in sterilizer station dated 13<sup>th</sup> July 2019, was attended by 4 workers.</li> <li>• Training of work instruction in water treatment plan dated 10<sup>th</sup> October 2019.</li> <li>• Training for operator in biogas plant dated 9<sup>th</sup> November 2019, was attended by 5 workers.</li> <li>• Training on handling of hazardous waste dated 27<sup>th</sup> February 2020 wast attended by 18 workers</li> <li>• Training of HCV dated 8<sup>th</sup> January 2020 was attended by 33 workers</li> <li>• Training for manuring application and LSU dated 23<sup>rd</sup> November 2019</li> <li>• Training for safety driving was conducted on 16<sup>th</sup> December 2019</li> <li>• Training of IPM (integrated pest management), dated 19 December 2019 was attended by all related staff and workers of pest management.</li> </ul>	
3.7.2	Records of training are maintained, where appropriate on an individual basis.	<p>Record of training has shown for an individual basis as per document of "Employee Training and Education Record", e.g:</p> <p>Namely Mr AS (biogas plant) training record:</p> <ul style="list-style-type: none"> <li>• Dated 11<sup>st</sup> October 2017; training of Work Instruction for biogas plant</li> <li>• Dated 19<sup>th</sup> February 2018; training on biogas operation</li> <li>• Dated 27<sup>th</sup> November 2018; refresh training of WI and SOP biogas plant</li> </ul>	Comply

		<ul style="list-style-type: none"> <li>Dated 9<sup>th</sup> November 2019; training of OHSE aspect – impact in biogas plant</li> </ul> <p>Namely Mr SF (operator in sterilizer)</p> <ul style="list-style-type: none"> <li>Dated 22<sup>nd</sup> August 2018; training of WI and SOP for operation on sterilizer</li> <li>Dated 22<sup>nd</sup> August 2018; training of OHSE aspect-impact</li> <li>Dated 15<sup>th</sup> July 2019; training of risk assessment</li> </ul> <p>Namely Mr AA (operator in engine room)</p> <ul style="list-style-type: none"> <li>Dated 9<sup>th</sup> August 2014; training of operation in engine room</li> <li>Dated 8<sup>th</sup> December 2015; refresh training of operation in engine room</li> <li>Dated 17<sup>th</sup> December 2016; training of OHSE aspect-impact</li> <li>Dated 16<sup>th</sup> September 2019; training of risk assessment</li> </ul> <p>Namely Mr F (supervisor of spraying), training record:</p> <ul style="list-style-type: none"> <li>Dated 28<sup>th</sup> March 2015; socialization the company policy</li> <li>Dated 3<sup>rd</sup> May 201; training of MSDS of chemical material</li> <li>Dated 6<sup>th</sup> September 2016; training on using the knapsack (spraying equipment)</li> <li>Dated 17<sup>th</sup> November 2017; refresh training of MSDS</li> <li>Dated 6<sup>th</sup> April 2018; training of calibration the knapsack (spraying equipment)</li> <li>Dated 14<sup>th</sup> December 2018; training related to OHS</li> <li>Dated 9<sup>th</sup> March 2019; refresh training of standardization of pesticides application</li> </ul>	
3.7.3	Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.	Training Program 2019 for RSPO Supply Chain planned in December 2019. Actual training for RSPO Supply Chain conducted on 19 Dec 2019, attended by 15 personnel including weighbridge clerk, production clerk, KTU and the Mill Manager. The training subjected to RSPO P&C 2018 Criterion 3.8 (RSPO Supply Chain). Training in Perlabian Estate conducted on 17 Dec 2019, attended by 26 personnel, including Harvesting mandors, Field Assistants, Head Assistant and Estate Manager.	Comply

**Supply chain requirements for mills.**  
**Procedural note:**  
 The below numbering is as per the current RSPO SCCS standard and will be renumbered to become 3.8 and onwards following the revision of the RSPO SCCS in 2019. 'D' therefore refers to RSPO SCCS 'Module D – Crude Palm Oil (CPO) mills: Identity Preserved' and 'E' to RSPO SCCS 'Module E – CPO mills: Mass Balance'. Depending on the supply chain model chosen, the corresponding requirements apply as well as all general requirements (those with numbers only).  
 The RSPO SCCS document uses the terms 'site' and 'organisation' to refer to the unit of certification.

<b>Definition</b>			
Identity Preserved Mill D.1	A mill is deemed to be Identity Preserved (IP) if the FFB used by the mill are sourced from plantation/ estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme. Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Module E is applicable.	Management decided PT Tolan Tiga Indonesia – Perlabian POM, to implement RSPO Supply Chain Model Identity Preserved. With the implementation of Supply Chain Model Identity Preserved, the POM only received and process FFB from certified company-owned estate. FFB suppliers of Perlabian POM are Perlabian Estate and Tolan Estate. Perlabian POM implemented the procedure of supply chain and traceability based on SOP Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019/Rev.0 dated 18 March 2019. Procedure completed with the flow diagram of FFB receiving, processing in POM, CPO shipping to tank terminal; Receiving and shipping of CPO from tank terminal. Person responsible for implementation of RSPO Supply Chain standard at the POM is the Mill Manager.	Comply
Mass Balance Mill E.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.	Management decided PT Tolan Tiga Indonesia – Perlabian POM, to implement RSPO Supply Chain Model Identity Preserved. With the implementation of RSPO Supply Chain Model Identity Preserved, the POM only received and process FFB from certified company-owned estate. FFB suppliers of Perlabian POM are Perlabian Estate and Tolan Estate. Not applicable.	N/A Not Applicable
<b>Explanation (Volume and product integrity)</b>			
D.2 E.2	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. For an independent mill, the estimated tonnage of CPO and PK products shall be recorded in the RSPO IT platform, supply chain certificate	The estimate annual tonnage for certified FFB, CPO and PK are available in the Estate and Mill annual production budget for 12 months since last surveillance assessment. The FFB tonnage received from all certified supply bases. Perlabian POM received certified raw material (Fresh Fruit Bunch) from its own estate: Perlabian Estate and Tolan Estate. The certification of Estates are fall under PT Tolan Tiga Indonesia – Perlabian POM with certificate number RSPO 555208, first certification start on 17 May 2010, second certification start on 17 May 2015 and expired on 16 May 2020. Currently the unit of	Comply

	<p>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.</p> <p>The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organisation (RSPO IT platform).</p>	<p>certification are being audit for Recertification. PT Tolan Tiga Indonesia – Perlabian Palm Oil Mill has been registered in RSPO IT Platform with registered ID number RSPO_PO1000000099.</p>	
<p><b>5.3 Documented procedures</b></p>			
<p>5.3.1 D.3 E.3</p>	<p>The site shall have written procedures and/or work instructions 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"> <li>• Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</li> <li>• Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</li> <li>• 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 organisation’s procedures for the implementation of this standard.</li> </ul>	<p>PT Tolan Tiga Indonesia – Perlabian POM has a written procedures and/work instruction for ensuring the implementation of RSPO Supply Chain Standard. The procedure is SOP Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019/Rev.0 dated 18 March 2019. The procedure are complete and up to date covering the implementation of all elements in the supply chain requirements, such as:</p> <ol style="list-style-type: none"> <li>a. Sales process, covering from contract approval to delivery of oil palm product (CPO and PK) including information of supply chain mechanism;</li> <li>b. Process at the estates, covers harvesting, FFB and loose fruit delivery include harvesting record and delivery to the Palm Oil Mill;</li> <li>c. Process at Palm Oil Mill, covers FFB and Loose fruit receiving, identification, production process, delivery of product and recording.</li> </ol>	<p>Comply</p>

	<ul style="list-style-type: none"> <li>The site shall have documented procedures for receiving and processing certified and non-certified FFBS.</li> </ul>		
<b>5.3.2 Internal Audit</b>			
5.3.2	<p>The site shall have a written procedure to conduct annual internal audit to determine whether the organisation;</p> <ul style="list-style-type: none"> <li>Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</li> <li>Effectively implements and maintains the standard requirements within its organisation.</li> </ul> <p>Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non- conformities shall be subject to management review at least annually. The organisation shall be able to maintain the internal audit records and reports.</p>	<p>Procedure for Internal Audit refer to SOP Routine Visit and Internal Audit No.ENC-01-02/04-03-2019/Rev.2 date 18 March 2019.</p> <p>Section 6. Frequency and Timing stipulates the internal audits are conducted at least once a year according to the standards referred to.</p> <p>Section 5.4 Implementation of Routine/Internal Audit Visits stipulates: <i>In general, non-conformities in each of the principle and criteria, rules and requirement of the sustainable system are categorized under major, minor and observation. Such findings must be immediately followed up. The unit manager may undertake to implement corrections and may also plan improvements according to result of internal audit. Recommended improvement must be completed with timeframe. A review of the non-compliance found in a previous internal audit should be made on the next visit.</i></p> <p>Internal Audit carried out on 13-14 January 2020, against RSPO P&amp;C 2018 Generic version. The internal auditor assessed Criteria 3.8 related to RSPO SCCS. Internal Audit report was available.</p> <p>From Internal Audit, there were findings related to:</p> <ul style="list-style-type: none"> <li>Evidence of monitoring by Perlavian POM to CPO &amp; PK transport contractors were not available for period 2020.</li> <li>Update data of CPO &amp; PK transport contractor, which handle RSPO certified product, were not available.</li> <li>Evidence of dissemination related Supply Chain requirements to contractor (driver) were not available.</li> </ul> <p>Latest Management Review in Perlavian POM conducted on 3 Mar 2020, attended by 7 personnel including Perlavian Mill Manager. Management review has discussed as recorded in minutes of meeting:</p> <ul style="list-style-type: none"> <li>Results of internal audits; internal audit in Perlavian POM conducted on 13-14 Jan 2020, by ENC RMO NS Team, summary of finding and corrective action have been documented in Visit Report ENC Team. Such as:</li> </ul>	Comply

		<ul style="list-style-type: none"> <li>○ No evidence of dissemination related code of conduct to employees and contractors recently. Action: conducted dissemination to employees and contractors related code of conduct. Status: has been done on 3 March 2020.</li> <li>○ Identification of training need was not found during audit. Action: establish document of training need identification and training program 2020. Status: training need identification and training program 2020 has been available in March 2020.</li> <li>• Customer feedback; Based on review of customer feedback conducted by Marketing Department, there is no complaint related CPO and PK quality sold to buyer.</li> <li>• Process performance and product conformity. FFB processed in Perlabian POM are coming from owned estates under the same management (PT Tolan Tiga Indonesia); Processing in Perlabian POM were using Palm oil Mill procedure Part I, II and III.</li> <li>• Status of preventive and corrective actions. All finding discussed in this Management Review have been closed and attached in the minutes of management review. Evidence of verification and closure were kept by Perlabian POM.</li> <li>• Follow-up actions from management reviews. Result of previous management review were discussed, mostly regarding performance, target achievement and FFB quality</li> <li>• Changes that could affect the management system. There is SOP revision related FFB Grading LAB-01-10/15-02-2019/Rev.2 addition in Sortation Specificatio Process, LAB-01-10-SPEC-01.</li> <li>• Recommendations for improvement. Follow up action from internal audit are keep implemented consistently, therefore not to be found during next internal or external audit.</li> </ul> <p>The management review output, as recorded in minutes of management review meeting dated 3 March 2020:</p> <ul style="list-style-type: none"> <li>• Improvement of the effectiveness of the management system and its processes: Coordinating with Marketing Department for buyer satisfaction survey evaluation.</li> <li>• Resources needs: PT Tolan Tiga Indonesia – Perlabian POM is committed to continue provision of adequate and relevant resources for the implementation, maintenance and improvement of RSPO SCC requirement.</li> </ul>	
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**5.4 Purchasing Goods In**

<p>D.4.1/ D.4.2 E.4.1/E.4.2</p>	<p>The site shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.          The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.          The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.</p>	<p>PT Tolan Tiga Indonesia – Perlavian POM has ensured that certified FFB received are RSPO certified based on the source of FFB. These FFB source are certified under PT Tolan Tiga Indonesia – Perlavian POM certificate (RSPO 555208). Based on interview with weighbridge clerk and FFB receiving station, Perlavian POM only received certified FFB from sustainable source: Perlavian Estate and Tolan Estate. There is no FFB received from other source.</p> <p>Perlavian POM does not need to check the certificate validity of the FFB source on the RSPO website, because the certification of the FFB suppliers is fall under PT Tolan Tiga Indonesia – Perlavian POM.</p> <p>PT Tolan Tiga Indonesia – Perlavian POM has demonstrated SOP Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019/Rev.0 dated 18 March 2019. Chapter 5.2 of the procedure indicates the Weighbridge Clerk has responsibility to input data and print “Receiving Slip” based on FFB Delivery Note, 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>The procedure SOP Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019/Rev.0 dated 18 March 2019 explains Operation Unit can coordinate to an evaluation with CB about the quota between the OU and the CB. During this annual surveillance assessment, Perlavian POM does not over sold CPO and PK production.</p> <p>The procedure SOP Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019/Rev.0 dated 18 March 2019 explains control of product non-conformity refer to Marketing Department Manual - SOP Customer Complaint Handling No.MKT-03-02/26-04/2018/rev.1 dated 30 April 2018. The procedure covers returned of all non-conforming product and/or documents. The responsible is Operating Unit Manager and Senior Manager Marketing. Based on audit, Perlavian POM only receive and processed sustainable FFB. There have been no complaint from buyer.</p> <p>Delivery of FFB from Field “SPB” No.PLE/027863 dated 14 Mar 2020 from Perlavian</p>	<p>Comply</p>
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		<p>Estate, Division F2; Block 11J14A; planting year 2011; total 485 bunches. Stamp Sustainable Product-IP.          Receiving slip/weighbridge ticket No.FFB20005342W, Perlabian Estate (PLE) dated 14 Mar 2020; D/O No. 027863; Block ID 11J14A; planting year 2011; total bunches 485; nett weight 6,560 kg. Stamp Sustainable Product-IP.</p> <p>Delivery of FFB from Field "SPB" No. TLE/077654 dated 9 Mar 2020 from Tolan Estate, Division 5, Block 00C33; planting year 2000; total 418 bunches. Stamp Sustainable Product-IP.          Receiving slip/weighbridge ticket No.FFB20004950W, Tolan Estate dated 9 Mar 2020; D/O No. PLE/077654; Block ID 00C33; planting year 2000; total bunches 418; nett weight 8,570 kg. Stamp Sustainable Product-IP.</p> <p>Daily Production Figure, dated 14 Mar 2020, stated that FFB received that day was 553.81 MT (Perlabian Estate 244.91 MT; Tolan Estate 308.90 MT); month todate was 6,213.96 MT and year todate was 32,912.59 MT.</p> <p>Daily Production Figure, dated 30 Dec 2019, stated that FFB received that day was 258.93 MT (Perlabian Estate: 114.64 MT and Tolan Estate: 144.29 MT); month todate was 13,458.99 MT and year todate was 200,949.75 MT.</p>	
<b>5.5 Outsourcing Activities</b>			
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>The transport for RSPO certified sustainable CPO and PK delivery were carried out by several contractors. Some contractors were appointed, contracted and instructed by PT Tolan Tiga Indonesia, and some other appointed, contracted and instructed by the buyer. During transport using the certificate holder's contractors, legal ownership of CSPO and CSPK are still under PT Tolan Tiga Indonesia. This evident by sales contract that between PT Tolan Tiga Indonesia and the buyer. Currently the certificate holder did not operate bulking storage at Dumai, all certified product are delivered to buyer.</p>	Comply

	<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 organisation (not the tank farm manager).</p>		
<p>5.5.2</p>	<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> <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> <p>c) The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p>	<p>During transport using the certificate holder’s contractors, legal ownership of CSPO and CSPK are still under PT Tolan Tiga Indonesia. This evident by sales contract that between PT Tolan Tiga Indonesia and the buyer.</p> <p>Agreement between PT Tolan Tiga Indonesia with transporters:</p> <p>a. “Perjanjian Pengangkutan PT. Tolan Tiga Indonesia dengan Pengangkutan Sahabat No.2015/Angkutan/CPO/PL-Dumai/01” signed on 1 February 2016. CV. Angkutan Sahabat issued a statement letter signed by Mr. Gunawan Ruslan, dated 11 January 2018. The statement “<i>CV Angkutan Sahabat bersedia mengikuti segala ketentuan terkait dengan prinsip dan kriteria supply chain RSPO dan CV Angkutan Sahabat bersedia dilakukan audit jika badan sertifikasi memerlukannya</i>” – CV Angkutan Sahabat is following requirement from RSPO Supply chain, and CV Angkutan Sahabat available for audit if needed by certification body.</p> <p>b. “Perjanjian Pengangkutan PT. Tolan Tiga Indonesia dengan CV. Jasa Sahabat Abadi No.2015/Angkutan/CPO/PL-Dumai/06” signed on 1 December 2016. CV. Jasa Sahabat Abadi issued a statement letter signed by Mr. Darmin Tanjudjaja, dated 23 March 2018. The statement “<i>CV Jasa Sahabat Abadi bersedia mengikuti segala ketentuan terkait dengan prinsip dan kriteria supply chain RSPO dan CV Jasa Sahabat Abadi bersedia dilakukan audit jika badan sertifikasi memerlukannya</i>” – CV Jasa Sahabat Abadi is following requirement from RSPO Supply chain, and CV Jasa Sahabat Abadi available for audit if needed by certification body.</p> <p>c. “Perjanjian Pengangkutan PT. Tolan Tiga Indonesia dengan CV. Sejahtera Abadi No.2015/Angkutan/CPO/PL-DUMAI/02” dated 1 February 2016. CV. Sejahtera Abadi issued a statement letter signed by Mr.Harsono Sukijung, dated 26 February 2019. The statement “<i>CV. Sejahtera Abadi bersedia mengikuti segala ketentuan terkait dengan prinsip dan kriteria supply chain RSPO dan CV. Sejahtera Abadi bersedia dilakukan audit jika badan sertifikasi memerlukannya</i>” – CV. Sejahtera Abadi is following requirement from RSPO Supply chain, and CV. Sejahtera Abadi available for</p>	<p>Comply</p>

		<p>audit if needed by certification body.</p> <p>d. "Perjanjian Pengangkutan PT. Tolan Tiga Indonesia dengan Pengangkutan Felindo No.2015/Angkutan/CPO/PL-Dumai/04" signed on 1 February 2016. Pengangkutan Felindo issued a statement letter signed by Drs. Sutrisno Sukijung, dated 1 March 2019. The statement "<i>Pengangkutan Felindo bersedia mengikuti segala ketentuan terkait dengan prinsip dan kriteria supply chain RSPO dan Pengangkutan Felindo bersedia dilakukan audit jika badan sertifikasi memerlukannya</i>" – Pengangkutan Felindo is following requirement from RSPO Supply chain, and Pengangkutan Felindo available for audit if needed by certification body.</p> <p>PT Tolan Tiga Indonesia – Perlabian POM has demonstrated SOP Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019/Rev.0 dated 18 March 2019. Section 5.4 Evaluation by Certification Body stipulates the Contractor Control: POM ensures that related contractors in the product supply chain have followed applicable procedures and audited contractors by internal/external if necessary.</p> <p>Means of control by Perlabian POM: "Buku Pemeriksaan Kendaraan CPO dan PK", sampled: CPO truck No. BK 9758 CL from CV Jasa Sahabat Abadi; inspected to deliver CPO from Perlabian POM to PT Ivo Mas Tunggal, dated 29 Feb 2020.          "Buku Pemeriksaan Kendaraan CPO dan PK" for PK truck No. BK 8365 DB from PT Sumber Trans Agung, inspected to deliver PK from Perlabian POM to buyer PT Ivo Mas Tunggal, dated 9 Sep 2019. PK truck No. BK 9772 EM from PT Sumber Trans Agung, inspected to deliver PK from Perlabian POM to buyer PT Ivo Mas Tunggal, dated 26 Nov 2019. Transport instruction made by buyer.</p>										
5.5.3	<p>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. 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.</p>	<p>Registered CPO Transporter of PT Tolan Tiga Indonesia:</p> <table border="1" data-bbox="913 1169 1966 1337"> <thead> <tr> <th>Contractor</th> <th>Contact Person</th> <th>Address</th> </tr> </thead> <tbody> <tr> <td>CV Angkutan Sahabat</td> <td>Mr. Gunawan Ruslan</td> <td>Jl. Petumbuhan Dusun III, Jaharun B – Ggalang, Deli Serdang – Sumatera Utara.</td> </tr> <tr> <td>CV Jasa Sahabat Abadi</td> <td>Mr. Darmin Tanjudjaja</td> <td>Jl. Besar Kisaran – Medan km 5 Sidomulyo, Pulo Bandring</td> </tr> </tbody> </table>	Contractor	Contact Person	Address	CV Angkutan Sahabat	Mr. Gunawan Ruslan	Jl. Petumbuhan Dusun III, Jaharun B – Ggalang, Deli Serdang – Sumatera Utara.	CV Jasa Sahabat Abadi	Mr. Darmin Tanjudjaja	Jl. Besar Kisaran – Medan km 5 Sidomulyo, Pulo Bandring	Comply
Contractor	Contact Person	Address										
CV Angkutan Sahabat	Mr. Gunawan Ruslan	Jl. Petumbuhan Dusun III, Jaharun B – Ggalang, Deli Serdang – Sumatera Utara.										
CV Jasa Sahabat Abadi	Mr. Darmin Tanjudjaja	Jl. Besar Kisaran – Medan km 5 Sidomulyo, Pulo Bandring										

		CV. Sejahtera Abadi	Mr. Harsono Sukijung	Jl. Jati No.65 Pulo Brayan Bengkel Kec. Medan Timur, Medan 20239	
		Pengangkutan Felindo	Mr. Sutrisno Sukijung	Jl. Gunung Krakatau Ujung No. 62, Medan	
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.	Perlabian POM updates the names and contact details of all transporters. Currently there is no bulking storage service use by Perlabian POM, sales of certified CPO and PK are always performed from Perlabian POM to buyer.			Comply
<b>5.9 Record keeping</b>					
5.9.1	The organisation shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements.	PT Tolan Tiga Indonesia – Perlabian POM maintains accurate, complete, up-to-date and accessible records and reports covering all aspects of RSPO Supply Chain Certification Standard requirements. The organization has implemented RSPO Supply Chain Certification Standard based on procedure SOP Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019/Rev.0 dated 18 March 2019. The procedure explains all aspects of supply chain and traceability scope in PT Tolan Tiga Indonesia: FFB harvesting, harvest recording and delivery to Palm Oil Mill; FFB receiving and processing in Palm Oil Mill, CPO and PK production and reporting; CPO and PK dispatch from Palm Oil Mill and receiving in storage tank for export; Shipping instruction and preparation; CPO and PK stock balancing post-shipping.			Comply
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.	<p>Procedure Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019/rev.0 dated 18 March 2019 – Section 5.2 Production Process in Mill stipulated storage and control of records related to production process in the mill are kept for shelf life of at least five (5) years or determined by operating unit.</p> <p>PT Tolan Tiga Indonesia – Perlabian POM have determined the retention time for all records and reports related to implementation of RSPO SCCS in “Daftar Induk Masa Simpan Dokumen” dated 18 September 2017:</p> <ul style="list-style-type: none"> <li>• Dokumen terkait Traceability 10 years;</li> <li>• FFB receiving report 10 years;</li> <li>• Weighbridge ticket for CPO and PK 10 years;</li> </ul>			Comply

		<ul style="list-style-type: none"> <li>• Delivery Order from Marketing Department for CPO and PK 10 years;</li> <li>• Monthly Progress Report 10 years;</li> <li>• Production Report, Despatch CPO &amp; PK 10 years;</li> <li>• Mill Processing Data 10 years;</li> <li>• Processing Daily Report 10 years;</li> <li>• Surat Pengantar FFB 10 years;</li> <li>• Weighbridge ticket for FFB receiving 10 years.</li> </ul>	
5.9.3	The organisation 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 Tolan Tiga Indonesia – Perlabian POM is able to provide estimate volume of CPO and PK in 12 months period as in “Budget Produksi Bulanan” consists estimate of FFB receiving from Perlabian Estate and Tolan Estate.</p> <p>Estimate of FFB volume received and processed in Perlabian POM for period March 2020 to February 2021 is 203,996 MT. Estimated volume for CPO is 44,471 MT and estimated volume for PK is 11,220 MT.</p>	
D.5.1	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.	<p>The organization has implemented SOP Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019/Rev.0 dated 18 March 2019. The procedure explains in all aspects of supply chain and traceability scope in Perlabian POM and Supply Bases, starting from FFB harvesting, harvest recording and delivery to Palm Oil Mill; FFB receiving and processing in Palm Oil Mill, CPO and PK production and reporting; CPO and PK dispatch from Palm Oil Mill, Shipping instruction and preparation, CPO and PK stock balancing post-shipping.</p> <p>Sample 1: CPO dispatch from Perlabian POM:</p> <ul style="list-style-type: none"> <li>• Despatch Slip No.CPO20000228W, dated 29 Feb 2020; from Perlabian POM; product CPO; quantity 28.20 MT; D/O No.2020/TTI-CPO/LTC/DO/24 (party of 250 MT); Certified Product ISCC; deliver to PT Ivo Mas Tunggal; Vehicle No. BK 9758 VO; Transporter CV Jasa Sahabat Abadi.</li> <li>• Delivery Order: 2020/TTI-CPO/LTC/DO/24 dated 28 Feb 2020, party of 250 MT</li> <li>• Contract: 2020/LTC-CPO/TTI/06, dated 29 Jan 2020, Location of Handover: Perlabian Palm Oil Mill, PO No. 9100060527.</li> </ul> <p>Sample 2: PK dispatch from Perlabian POM:</p> <ul style="list-style-type: none"> <li>• Despatch Slip No.PK19000303W, dated 9 Sep 2019; from Perlabian POM; product Palm</li> </ul>	Comply

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		<p>Kernel; quantity 25.12 MT; D/O No. 2019/LTC-PK/PL/DO/10 (party of 600 MT); Certificate RSPO 555208; Sustainable Product IP; deliver to PT Ivo Mas Tunggal; Vehicle No. BK 8365 DB; Transporter PT Sumber Trans Agung.</p> <ul style="list-style-type: none"> <li>• Delivery Order: 2019/LTC-PK/PL/DO/10, dated 2 Sep 2019, party of 600 MT.</li> <li>• Contract: 2019/LTC-PK/PL/10, dated 23 Aug 2019, Location of Handover: Perlabian Palm Oil Mill, PO No. 9100055156.</li> <li>• Include in Shipping Announcement TR-588be23e-f5ff.</li> </ul> <p>Sample 3: PK dispatch from Perlabian POM:</p> <ul style="list-style-type: none"> <li>• Despatch Slip No.PK19000448W, dated 26 Nov 2019; from Perlabian POM; product Palm Kernel; quantity 21.72 MT; D/O No. 2019/LTC-PK/PL/DO/13 (party of 900 MT); Certificate RSPO 555208; Sustainable Product IP; deliver to PT Ivo Mas Tunggal; Vehicle No. BK 9772 EM; Transporter PT Sumber Trans Agung.</li> <li>• Delivery Order: 2019/LTC-PK/PL/DO/13, dated 15 Oct 2019, party of 900 MT.</li> <li>• Contract: 2019/LTC-PK/PL/13, dated 25 Sep 2019, Location of Handover: Perlabian Palm Oil Mill, PO No. 9100056432.</li> <li>• Include in Shipping Announcement TR-e158f7a8-624f.</li> </ul> <p>All receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK are recorded and balanced on a real-time basis as documented in "Sustainable Production". The document recorded FFB received, CPO and PK beginning stock, production, despatched, adjustment, buyer name, ending stock, OER and KER.</p>	
E.5.1	<p>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.</p> <p>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 by RSPO.</p> <p>c) The site can only deliver Mass Balance sales from a positive stock. Positive stock can include</p>	<p>PT Tolan Tiga Indonesia implemented Model Identity Preserved.          Not applicable.</p>	<p>N/A          Not Applicable</p>

	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.)		
<b>5.10 Conversion Factors</b>			
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. Organisations 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 ( <a href="http://www.rspo.org">www.rspo.org</a> ).	Conversion rate is applied to provide reliable estimation of CPO and PK produced. For year 2019, the budget for conversion from FFB into CPO is 22.22%, whilst from FFB to PK is 5.5%. Actual conversion for year 2019 from FFB to CPO is 22.55%, whilst from FFB to PK 5.86% PT Tolan Tiga Indonesia – Perlabian POM reported the conversion factors based on averaged actual monthly OER and KER.	Comply
5.10.2	Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.	The actual conversion rates in form of Oil Extraction Rates (OER) and Kernel Extraction Rates (KER) are monitored on daily basis through sounding result and documented in Daily Production Figure.  Daily Production Report 14 Mar 2020: FFB Stock is 265.21 MT; FFB received is 553.81 MT; FFB processed is 584.05 MT; CPO Production 131.70 MT; OER 22.55%; PK Production 37.21 MT; KER 6.37%.  Daily Production Report 30 Dec 2019: FFB Stock is 219.49 MT; FFB received is 258.93 MT; FFB processed is 478.43 MT; CPO Production 123.14 MT; OER 25.74%; PK Production 30.02 MT; KER 6.28%.	Comply
Processing D.6	The site shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non- certified oil palm product including during transport and storage to strive for 100% separation.	Based on audit, PT Tolan Tiga Indonesia – Perlabian POM did not receive any non-certified FFB. Therefore, no non-certified FFB being entered the process, no non-certified CPO and PK being produced, no non-certified product being dispatched. Storage tank for CPO dedicated only for certified oil. Silo for PK used to store only certified product.	Comply
<b>5.6 Sales and goods out</b>			

<p>5.6.1</p>	<p>The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form: The name and address of the buyer;</p> <ul style="list-style-type: none"> <li>• The name and address of the seller;</li> <li>• The loading or shipment / delivery date;</li> <li>• The date on which the documents were issued;</li> <li>• A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations);</li> <li>• The quantity of the products delivered;</li> <li>• Any related transport documentation;</li> <li>• Supply chain certificate number of the seller;</li> <li>• A unique identification number.</li> <li>• 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).</li> <li>• 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.</li> </ul>	<p>The SOP Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019/Rev.0 dated 18 March 2019 regulated that several information required by the standard have to be available in the sales and goods out document. Sales and goods out documents seen are as follows:</p> <p>Sample 1: CPO dispatch from Perlabian POM:</p> <ul style="list-style-type: none"> <li>• Dispatch Slip No.CPO20000228W, dated 29 Feb 2020; from Perlabian POM; product CPO; quantity 28.20 MT; D/O No.2020/TTI-CPO/LTC/DO/24 (party of 250 MT); Certified Product ISCC; deliver to PT Ivo Mas Tunggal; Vehicle No. BK 9758 VO; Transporter CV Jasa Sahabat Abadi.</li> <li>• Delivery Order: 2020/TTI-CPO/LTC/DO/24 dated 28 Feb 2020, party of 250 MT</li> <li>• Contract: 2020/LTC-CPO/TTI/06, dated 29 Jan 2020, Location of Handover: Perlabian Palm Oil Mill, PO No. 9100060527.</li> </ul> <p>Sample 2: PK dispatch from Perlabian POM:</p> <ul style="list-style-type: none"> <li>• Dispatch Slip No.PK19000303W, dated 9 Sep 2019; from Perlabian POM; product Palm Kernel; quantity 25.12 MT; D/O No. 2019/LTC-PK/PL/DO/10 (party of 600 MT); Certificate RSPO 555208; Sustainable Product IP; deliver to PT Ivo Mas Tunggal; Vehicle No. BK 8365 DB; Transporter PT Sumber Trans Agung.</li> <li>• Delivery Order: 2019/LTC-PK/PL/DO/10, dated 2 Sep 2019, party of 600 MT.</li> <li>• Contract: 2019/LTC-PK/PL/10, dated 23 Aug 2019, Location of Handover: Perlabian Palm Oil Mill, PO No. 9100055156.</li> <li>• Include in Shipping Announcement TR-588be23e-f5ff.</li> </ul> <p>Sample 3: PK dispatch from Perlabian POM:</p> <ul style="list-style-type: none"> <li>• Dispatch Slip No.PK19000448W, dated 26 Nov 2019; from Perlabian POM; product Palm Kernel; quantity 21.72 MT; D/O No. 2019/LTC-PK/PL/DO/13 (party of 900 MT); Certificate RSPO 555208; Sustainable Product IP; deliver to PT Ivo Mas Tunggal; Vehicle No. BK 9772 EM; Transporter PT Sumber Trans Agung.</li> <li>• Delivery Order: 2019/LTC-PK/PL/DO/13, dated 15 Oct 2019, party of 900 MT.</li> <li>• Contract: 2019/LTC-PK/PL/13, dated 25 Sep 2019, Location of Handover: Perlabian Palm Oil Mill, PO No. 9100056432.</li> <li>• Include in Shipping Announcement TR-e158f7a8-624f.</li> </ul>	<p>Comply</p>
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		<p>Information are complete and presented in several document, e.g. Despatch Slip, Delivery Order and Sales Contract.</p> <p>The information completely available in the documents:</p> <ul style="list-style-type: none"> <li>• The name and address of the buyer: PT Ivo Mas Tunggal; Sinar Mas Land Plaza Menara 2 Lantai 30, Jl. MH Thamrin No.51 Gndangdia Menteng, Jakarta Pusat.</li> <li>• The name and address of the seller: PT Tolan Tiga Indonesia, Gedung Forum Nine Lt.10, Suite 1-11, Jl. Imam Bonjol No.9, Medan 20112.</li> <li>• The loading or shipment/delivery date: 9 Sep 2019 on Dispatch Slip No.PK19000303W and on 26 Nov 2019 on Dispatch Slip No.PK19000448W.</li> <li>• The date on which the documents were issued: on 2 Sep 2019 on Delivery Order: 2019/LTC-PK/PL/DO/10 and on 15 Oct 2019 on Delivery Order: 2019/LTC-PK/PL/DO/13.</li> <li>• A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations): Palm Kernel – Sustainable Product IP on Dispatch Slip.</li> <li>• The quantity of the products delivered; 25.12 MT on Dispatch Slip No.PK19000303W and 21.72 MT Dispatch Slip No.PK19000448W.</li> <li>• Any related transport documentation: Dispatch Slip No.PK19000303W and 21.72 MT Dispatch Slip No.PK19000448W.</li> <li>• Supply chain certificate number of the seller; RSPO Certificate No. RSPO 55208 on Dispatch Slip.</li> </ul> <p>A unique identification number: PK19000303W and PK19000448W on Dispatch Slip.</p>	
<b>5.7 Registration of Transactions</b>			
5.7.1	<p>Supply chain actors who:</p> <ul style="list-style-type: none"> <li>• Are mills, traders, crushers and refineries; and</li> <li>• 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 RSPO IT platform and confirm upon receipt</li> </ul>	<p>PT Tolan Tiga Indonesia – Perlabian POM is a palm oil mill which takes legal ownership and physically handled RSPO certified sustainable oil palm product (FFB, CSPO and CSPK), therefore the site has been registered in RSPO IT Platform with ID number RSPO_PO1000000099.</p>	Comply

	where applicable.		
5.7.2	<p>The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform: 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.</p> <p>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.</p> <p>Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed.</p> <p>Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements.</p>	<p>As a Palm Oil Mill which takes legal ownership and physically handled RSPO certified sustainable oil palm product, PT Tolan Tiga Indonesia – Perlabian POM has made Shipping Announcement for certified PK sold. For period 2019 until February 2020, certified CPO were sold for other certified scheme (ISCC).</p> <p>For example:</p> <ul style="list-style-type: none"> <li>Shipping Announcement transaction ID TR-588be23e-f5ff dated 30 Aug 2019; for 600 MT CSPK IP; from PT Tolan Tiga Indonesia – Perlabian POM as Seller to Buyer PT Ivo Mas Tunggal.</li> <li>Shipping Announcement transaction ID TR-e158f7a8-624f dated 13 Dec 2019; for 377.54 MT CSPK IP; from PT Tolan Tiga Indonesia – Perlabian POM as Seller to Buyer PT Ivo Mas Tunggal.</li> </ul> <p>PT Tolan Tiga Indonesia – Perlabian POM is producing sustainable CPO and PK. The RSPO P&amp;C certification scope does not go beyond refinery. "Trace" is not applicable.</p> <p>PT Tolan Tiga Indonesia - Perlabian POM has done "Remove" in the RSPO IT Platform for CSPO sold as other scheme (ISCC or conventional), e.g.:</p> <ul style="list-style-type: none"> <li>Transaction ID: ST-TR-49b78594-373b; dated 13 Dec 2019; Stock Transaction Type: Remove from certified stock; Transaction volume: 2,825.79 MT.</li> <li>Transaction ID: ST-TR-b665e036-5901; dated 13 Dec 2019; Stock Transaction Type: Remove from certified stock; Transaction volume: 498.84 MT.</li> <li>Transaction ID: ST-TR-9039136d-75cd; dated 13 Dec 2019; Stock Transaction Type: Remove from certified stock; Transaction volume: 486.45 MT.</li> </ul> <p>PT Tolan Tiga Indonesia – Perlabian POM is a palm oil mill, which does not need to confirm any purchase of FFB. "Confirm" is not applicable.</p>	Comply
<b>5.11 Claims</b>			
5.11.1	The site shall only make claims regarding the use	The procedure for claims is stated in SOP Supply Chain and Traceability of Palm Products	Comply

	of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules on Market Communications and Claims.	No.MKT-03-06/04-03-2019/Rev.0 dated 18 March 2019. PT Tolan Tiga Indonesia – Perlabian POM made claim regarding the sales of RSPO certified oil palm products, as evidence in Dispatch Slip and Delivery Order by stating the product is certified RSPO IP. The organization has good understanding on the RSPO Rules on Market Communications and Claims.	
<b>General corporate communications</b>			
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 Tolan Tiga Indonesia is a subsidiary of RSPO registered member, SIPEF Group. SIPEF Group, the parent company of PT Tolan Tiga Indonesia is highlighting its commitment to the principles of RSPO – therefore making an off product communication. The corporate communication of SIPEF Group can be seen in the corporate website: <a href="http://www.sipec.com">www.sipec.com</a> .	Comply
4.2	In corporate communications a member is allowed to: a. Display its RSPO membership status b. Display the RSPO web address ( <a href="http://www.rspo.org">www.rspo.org</a> ) c. State that the member supports the work of the RSPO d. State the member's history with regard to the RSPO. e. Use the RSPO trademark to promote its membership of the RSPO. Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at <a href="http://www.rspo.org">www.rspo.org</a> ' where the link must lead to the member's profile page.	Corporate communication in SIPEF Group website: a. Display its RSPO membership status: No, SIPEF did not display its RSPO membership status. b. Display the RSPO web address: Not in direct manner. SIPEF made a link to RSPO website. c. State the member supports the work of the RSPO: Not in direct manner. In the website, SIPEF wrote "We believe in a landscape approach to new oil palm developments, guided by the methodology endorsed by the RSPO". d. State the member's history with regards to the RSPO: No. SIPEF did not state their history with regards to the RSPO. e. Use of RSPO Trademark to promote its membership of the RSPO: No, SIPEF did not use RSPO trademark in its corporate communication such in website.	Comply
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, SIPEF 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.	Comply
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or	No, SIPEF did not display its RSPO membership status. It is clear that the statement are clear and did not mislead consumers or other	Comply

	other stakeholders as to the certified content of oil palm products in the member's own products.	stakeholders as to the certified content of oil palm products in the SIPEF's own products.	
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	No, SIPEF Group did not display the RSPO Corporate Logo in the website as well as in the correspondence letter.	Comply
<b>Business to business communications</b>			
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.	PT Tolan Tiga Indonesia stating RSPO IP in the sales document. The RSPO IP notation adhere to the requirements of RSPO SCCS. PT Tolan Tiga Indonesia – Perlabian POM is certified against RSPO P&C 2018 that include RSPO Supply Chain requirements for CPO Mills. All of the palm oil mills process and handling are managed to demonstrate integrity of supply chain model identity preserved. During sales of CSPO and CSPK, PT Tolan Tiga Indonesia made clear that the product is Identity Preserved.	Comply
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.	PT Tolan Tiga Indonesia stating RSPO IP in the sales document. The RSPO IP notation adhere to the requirements of RSPO SCCS. PT Tolan Tiga Indonesia – Perlabian POM is certified against RSPO P&C 2018 that include RSPO Supply Chain requirements for CPO Mills. All of the palm oil mills process and handling are managed to demonstrate integrity of supply chain model identity preserved. During sales of CSPO and CSPK, PT Tolan Tiga Indonesia made clear that the product is Identity Preserved.	Comply
5.3	Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options: a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer's SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the	PT Tolan Tiga Indonesia – Perlabian POM is not a distributor or wholesaler, the site is a Palm Oil Mill that process FFB into CPO and PK. Not Applicable.	N/A

	<p>distributor or wholesaler, with specific evidence either through on-pack claims or documentation.</p> <p>b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p>		
5.4	<p>A certified member can provide information to its customers detailing the presence of certified palm oil contained within a product even if it is not eligible for a product-specific under RSPO rules. The end product must not be labelled as certified or sold in such a way that implies RSPO certification.</p> <p>For example, a retailer or food service company may require a breakdown of all palm based ingredients within an end product and the certified status of each. This information may be provided by a certified RSPO member without constituting a product-specific claim.</p>	<p>PT Tolan Tiga Indonesia – Perlabian POM is a Palm Oil Mill that process FFB into CPO and PK. The site sold its product in bulk, no product label attached.</p> <p>Not applicable.</p>	N/A
<b>Business to consumer communication</b>			
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 product(s), which are known as 'product-specific' claims. Product-specific claims are voluntary.</p>	<p>PT Tolan Tiga Indonesia – Perlabian POM is an RSPO certificate holder with certificate number RSPO 555208 valid until 16 May 2020. Currently in process of recertification. The certificate holder sold its oil palm product in bulk, no product label attached. No 'product-specific' claims are used.</p> <p>Not applicable.</p>	N/A
6.2	<p>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.</p>	<p>PT Tolan Tiga Indonesia – Perlabian POM is an RSPO certificate holder with certificate number RSPO 555208 valid until 16 May 2020. Currently in process of recertification. The certificate holder sold its oil palm product in bulk, no product label attached. No RSPO trademark and/or RSPO label claims are used.</p> <p>Not applicable.</p>	N/A
6.3	<p>When on-pack claims on RSPO-certified</p>	<p>PT Tolan Tiga Indonesia – Perlabian POM sold its oil palm product in bulk, no product</p>	N/A

	sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.	pack are used. Not applicable.	
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	PT Tolan Tiga Indonesia – Perlabian POM communication has not stated information about the claimant's RSPO membership status.	Comply
6.5	Members shall not communicate to consumers information about their suppliers' RSPO membership status.	PT Tolan Tiga Indonesia – Perlabian POM is certified RSPO P&C, selling CSPO and CSPK. PT Tolan Tiga Indonesia – Perlabian POM and the parent compant - SIPEF Group did not make any communication about their supplier's RSPO membership status.	Comply
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.	The site sold its oil palm product in bulk, up to this moment, PT Tolan Tiga Indonesia – Perlabian POM has not use RSPO trademark.	Comply
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.	Up to this moment, PT Tolan Tiga Indonesia – Perlabian POM has not use any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products.	Comply
6.8	RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims	PT Tolan Tiga Indonesia – Perlabian POM is not a retailer or food service company. Not applicable.	N/A

	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 <a href="http://www.rspo.org">www.rspo.org</a> .		
<b>MODULE A – IDENTITY PRESERVED &amp; SEGREGATED SPECIFIC RULES</b>			
<b>Certified oil palm content (IP)</b>			
	For IP, 95% or above of the oil palm content must be RSPO IP-certified.	PT Tolan Tiga Indonesia – Perlabian POM did not received FFB from non-certified source, therefore implement RSPO Supply Chain Model Identity Preserved (IP).	Comply
	For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.	PT Tolan Tiga Indonesia – Perlabian POM did not received FFB from non-certified source, therefore implement RSPO Supply Chain Model Identity Preserved (IP).	Comply
	Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the volume of non-certified oil palm products must be covered by the purchase of RSPO Credits of equivalent volume.	PT Tolan Tiga Indonesia – Perlabian POM managed to demonstrated that the traceability is intact throughout the supply chain. There is no percentage of non-certified oil palm contaminating/ commingling with the certified product.	Comply
<b>Labelling and trademark (IP)</b>			
	Members are allowed to use the RSPO label in one of the following ways: a. RSPO trademark which includes the tag 'CERTIFIED' or b. RSPO trademark which includes the tag 'This product contains certified sustainable palm oil'. Wherever a RSPO trademark is displayed, the	PT Tolan Tiga Indonesia – Perlabian POM is a Palm Oil Mill that process FFB into CPO and PK. The site sold its product in bulk, no product label attached. Not applicable.	N/A

	<p>applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack.</p>		
<b>Messaging (IP)</b>			
	<p>Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements:</p> <ul style="list-style-type: none"> <li>• The oil palm products contained in this product have been certified to come from RSPO sources. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• Certified sustainable oil palm products can be traced back to RSPO-certified mills and plantations. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• The entire supply chain is monitored by independent, RSPO-accredited auditors. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• RSPO-certified sustainable palm oil has been produced to stringent environmental and social criteria. <a href="http://www.rspo.org">www.rspo.org</a></li> <li>• References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records.</li> </ul>	<p>Up to this moment, PT Tolan Tiga Indonesia – Perlabian POM has not use any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products. The site sold its product in bulk, no product label attached.            Not applicable.</p>	<p>N/A</p>



<b>Principle 4: Respect community and human rights and deliver benefit</b> Respect community rights, provide equal opportunities, maximise benefits from engagement and ensure remediation where needed.			
<b>Criteria 4.1</b> The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.			
4.1.1	<p><b>(C)</b> A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, supply chain and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p>	<p>Certificate holder has had a policy to respect human rights that signed by Board of Management on 10 June 2015. SIPEF committed to:</p> <ul style="list-style-type: none"> <li>• <i>Recognizes that Human Rights are universal and apply to all, without any form of distinction.</i></li> <li>• <i>Supports the implementation of the International Bill of Human Rights, and of the ILO.</i></li> <li>• <i>Declaration on Fundamental Principles and Rights at Work, as they are transcribed into the laws and regulations of the countries where we operate.</i></li> <li>• <i>Charges of violation of Human Rights, where substantiated, will result in disciplinary action up to and including dismissal, and may also lead to legal action.</i></li> <li>• <i>This Policy applies to all Companies under the Management of SIPEF.</i></li> </ul> <p>This policy can be downloaded at <a href="https://www.sipef.com/hq/sustainability/policies/human-rights-policy/">https://www.sipef.com/hq/sustainability/policies/human-rights-policy/</a>. It policy also installed in notice board.</p> <p>Based on interview with board of labor union and gender committee from Perlabian Estate/Mill and Tolan Tiga Estate obtained information that SIPEF respect in human rights. There is no discrimination based on races, religion, ethnics, gender etc. Each worker assessed objectively based on their annual performances.</p>	Comply
4.1.2	<p>The unit of certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations.</p>	<p>During the audit, through the public consultation with village head surrounding the company areas, local government, NGO's and local journalist obtained information that there is a record of land claims between the company and Kelompok Tani Bersatu (KTB). However, certificate holder did not using violence approach to handle all case related to their operational activity. There is no evidences of mercenaries and paramilitaries usage in their operations.</p>	Comply

<b>Criteria 4.2</b> There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.			
4.2.1	<p><b>(C)</b> The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p>	<p>PT. Tolan Tiga Indonesia have a mechanism to resolve dispute, which consist of: Land dispute referring to land conflict resolution "Prosedur Ganti Rugi Lahan No.SOP/CA/02" dated 1 July 2012. The procedure demonstrates that company has provides effective land conflict resolution:</p> <ul style="list-style-type: none"> <li>• Company communicating the permit/HGU to community.</li> <li>• Should there be claim from community, company will receive the claim if complemented with evidence of land ownership.</li> <li>• Status verification of the said land, with involvement of company personnel, claimant/community and government representative.</li> <li>• Field visit and measurement to the claimed land. Minutes of land measurement then produced, with information on hectarage and coordinate points of claimed land, signed by all parties.</li> <li>• Final verification based on measurement result and map, to ensure the land is clean and clear, no overlapping with other ownership/other right and no claim from other party.</li> <li>• Should the final verification demonstrated that the land has no overlapping with other ownership/other right and no claim from other party – company will negotiate the price and carried out the compensation.</li> <li>• Once price agreed, based on negotiation, company will pay the claimant/land owners.</li> </ul> <p>Internal dispute/complaint resolution referring to "Mekanisme Keluh Kesah dengan Pihak Internal rev.II Doc.No.SOP/025/Dept" dated 27 March 2015.</p> <p>External dispute/complaint resolution referring to "Mekanisme Keluh Kesah dengan Pihak Eksternal rev.II Doc.No.SOP/026/HRA" dated 27 March 2015.</p> <p>Within these documents, company has indicated policy to protect anonymity of whistleblower, if requested.</p> <p>According to the stakeholder consultation with labor union and gender committee obtained information that they has been informed about this procedure. All employees are</p>	Comply

		<p>free to submit their complaints to the management. However, employees usually submitted their complaints to the labor union which was deliver it to the monthly meeting of bipartite.</p> <p>According to public consultation result with surrounding communities during the audit such as village head and community leader from Pekan Tolan, Menanti, Air Merah and Tanjung Medan Village, obtained information that there was no land acquisition process from community land by the company because all company concessions had existed since the Dutch era. There is no previous land owner existed.</p> <p>PT. Tolan Tiga Indonesia attended claim over land, coming from community members from Kecamatan Bilah Hulu district, Labuhanbatu Selatan regency. The claim was for land of 716.40 Ha in Tolan Estate, however the claimant cannot point the exact location of disputed area.</p> <p>Document sighted:</p> <ul style="list-style-type: none"> <li>o "Surat Kepolisian Negara Republik Indonesia Daerah Sumatera Utara Resor Labuhanbatu No.B/7135/X/Bag Ops, dated 24 October 2018 related invitation for mediation. The mediation date 29 October 2018, for claim "Klaim Kelompok Tani Bersatu Dusun Menanti, Desa Meranti, Kecamatan Bilah Hulu, Kabupaten Labuhanbatu di areal HGU PT. Tolan Tiga Indonesia di Dusun Sri Pinang, Desa Perkebunan Perlabian, Kecamatan Kampung Rakyat, Kabupaten Labuhanbatu Selatan" of 716.40 Ha.</li> <li>o Minutes of mediation meeting "Notulen Rapat Mediasi terkait Klaim Lahan Kelompok Tani Bersatu Dusun Menanti, Desa Meranti, Kecamatan Bilah Hulu, Kabupaten Labuhanbatu di areal HGU PT. Tolan Tiga Indonesia di Dusun Sri Pinang, Desa Perkebunan Perlabian, Kecamatan Kampung Rakyat, Kabupaten Labuhanbatu Selatan", dated 29 October 2018. Conclusion: "Polres Labuhanbatu akan mengadakan koordinasi dengan Pemerintah Kabupaten Labuhanbatu Selatan/Bupati dalam upaya penyelesaian sengketa lahan. Akan dilakukan pertemuan/mediasi lanjutan menunggu hasil koordinasi dengan pihak Pemerintah Kabupaten Labuhanbatu Selatan dan akan mengundang pihak yang bersengketa. Kepada pihak yang bersengketa agar bersama-sama menciptakan kamtibmas yang kondusif" –</li> </ul>	
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		<p>police will made subsequent coordination meeting with government from Labuhanbatu Selatan regency, for all parties to maintain security and conducive situation.</p> <ul style="list-style-type: none"> <li>○ Copy of State Court Decision for the same case in 2014, which resulted in have been sighted "Salinan Putusan Pengadilan Negeri Rantauprapat – Perkara Perdata Gugatan Reg.No.56/PDt.G/2013/PN-RAP antara Kelompok Tani Bersaru (KTB) Penggugat lawan PT. Tolan Tiga Indonesia (SIPEF) Dkk Tergugat. Dalam Pokok Perkara: Menyatakan Gugatan Penggugat tidak dapat diterima (Niet Onvankikje ver klaard). Dalam Rekonpensi: Menolak Gugatan Rekonpensi Penggugat untuk seluruhnya" dated 16 September 2014 – repudiate plaintiff claim.</li> </ul>	
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.	<p>During the audit, sighted all of company policies has also installed in the public area such as in the notice board in each units.</p> <p>According to the stakeholder consultation with labor union and gender committee obtained information that they has been socialized about the policies. All employees are treated humanely without discrimination. Female employees also have reproductive rights such as menstruation and maternity leave and they remain paid during that leave. There is no illiterate employee so far.</p>	Comply
4.2.3	The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.	<p>Certificate holder has had Responding to Request for Information Procedure (ENC-01-11/04-03/2019/Rev.1) that approved by Principal Director since 18 March 2019. Some important or guidance of the procedure was:</p> <ul style="list-style-type: none"> <li>• Unit management should provide a record book of information and answers with the shelf life "CONTINUOUS/ONGOING".</li> <li>• Requested for information / data referred to this procedure are requests for written information by mail, fax, e-mail or verbally (directly delivered via telephone, including sort message service from stakeholder at the farm/mill/factory.</li> <li>• Evaluation of information request by stakeholders (publicly accessed document and non-publicly accessed document.</li> <li>• Time limit to response the information request. <ul style="list-style-type: none"> <li>○ If needed assistance from senior manager office: within 3 working days</li> <li>○ If needed assistance from department head: within 7 working days.</li> </ul> </li> </ul>	Comply

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		<ul style="list-style-type: none"> <li>○ If needed assistance from board if director: within 25 working days.</li> </ul> <p>Certificate holder also had Grievance Procedure (IAD-01-08/22-01-2020/Rev.0) approved since 30 January 2020. Some important notice written in this procedure was:</p> <ul style="list-style-type: none"> <li>• Complainants sends grievance by email, WhatsApp and messages to grievance block.</li> <li>• All complainant are to be given response within 3 days.</li> <li>• Department concerned collect information and documents to answer question of complainant.</li> <li>• A formal response referencing the original grievance will be sent within 30 days and will be informed if more than 30 days.</li> <li>• Informing that the complainant have to answer within two weeks, complainant should confirm that they are satisfied within two weeks, if no answer the case will be closed.</li> </ul> <p>The operating unit is responsible for managing and carrying out the procedure above. Head of OU appointed PIC to socialize those procedure. Sighted the evidence of socialization conducted by mill assistant to the mill workers on 9 March 2020.</p> <p>Based on public consultation with respective village head surrounding area such as village head and community leader from Pekan Tolan, Menanti, Air Merah and Tanjung Medan Village obtained information that the requested information procedures and or donation proposals have been well informed. However, the village head usually requested information by phone or short message services directly to the estate/mill manager. Request of information submitted usually for donation proposals or heavy equipment loans which also signed by sub district head.</p> <p>During the audit, auditor also conducted focus group discussion with internal stakeholder such as labour union and gender committee. Through the interview obtained information that if any information request usually through the bipartite meeting. Until now, all requests for information were answered well in a bipartite meeting.</p>	
4.2.4	The conflict resolution mechanism includes the option of access to independent legal and technical	The company has a mechanism for land compensation No.SOP/CA/02 dated 1 July 2012. The mechanism has defined the compensation process through FPIC process,	Comply

	<p>advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.</p>	<p>document/evidence of land ownership verification and participatory mapping and measurement, as well compensation negotiation. The compensation process would include: measurement application, minutes of land survey/measurement, land ownership letter, statement of no conflict, statement of ownership rights, statement from heir, statement of land owner/scheme smallholder owner (if any), statement on rights to cultivate release, compensation letter. All procedures/information available in Bahasa Indonesia.</p> <p>According to public consultation result with surrounding communities during the audit such as village head and community leader from Pekan Tolan, Menanti, Air Merah and Tanjung Medan Village, obtained information that there was no land acquisition process from community land by the company because all company concessions had existed since the Dutch era. There is no previous land owner existed.</p> <p>PT. Tolan Tiga Indonesia attended claim over land, coming from community members from Kecamatan Bilah Hulu district, Labuhanbatu Selatan regency. The claim was for land of 716.40 Ha in Tolan Estate, however the claimant cannot point the exact location of disputed area.</p> <p>Document sighted:</p> <ul style="list-style-type: none"> <li>○ "Surat Kepolisian Negara Republik Indonesia Daerah Sumatera Utara Resor Labuhanbatu No.B/7135/X/Bag Ops, dated 24 October 2018 related invitation for mediation. The mediation date 29 October 2018, for claim "Klaim Kelompok Tani Bersatu Dusun Menanti, Desa Meranti, Kecamatan Bilah Hulu, Kabupaten Labuhanbatu di areal HGU PT. Tolan Tiga Indonesia di Dusun Sri Pinang, Desa Perkebunan Perlabian, Kecamatan Kampung Rakyat, Kabupaten Labuhanbatu Selatan" of 716.40 Ha.</li> <li>○ Minutes of mediation meeting "Notulen Rapat Mediasi terkait Klaim Lahan Kelompok Tani Bersatu Dusun Menanti, Desa Meranti, Kecamatan Bilah Hulu, Kabupaten Labuhanbatu di areal HGU PT. Tolan Tiga Indonesia di Dusun Sri Pinang, Desa Perkebunan Perlabian, Kecamatan Kampung Rakyat, Kabupaten Labuhanbatu Selatan", dated 29 October 2018. Conclusion: "Polres Labuhanbatu akan mengadakan koordinasi dengan Pemerintah Kabupaten Labuhanbatu Selatan/Bupati</li> </ul>	
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		<p>dalam upaya penyelesaian sengketa lahan. Akan dilakukan pertemuan/mediasi lanjutan menunggu hasil koordinasi dengan pihak Pemerintah Kabupaten Labuhanbatu Selatan dan akan mengundang pihak yang bersengketa. Kepada pihak yang bersengketa agar bersama-sama menciptakan kamtibmas yang kondusif” – police will made subsequent coordination meeting with government from Labuhanbatu Selatan regency, for all parties to maintain security and conducive situation.</p> <ul style="list-style-type: none"> <li>o Copy of State Court Decision for the same case in 2014, which resulted in have been sighted “Salinan Putusan Pengadilan Negeri Rantauprapat – Perkara Perdata Gugatan Reg.No.56/PDt.G/2013/PN-RAP antara Kelompok Tani Bersaru (KTB) Penggugat lawan PT. Tolan Tiga Indonesia (SIPEF) Dkk Tergugat. Dalam Pokok Perkara: Menyatakan Gugatan Penggugat tidak dapat diterima (Niet Onvankikje ver klaard). Dalam Rekonpensi: Menolak Gugatan Rekonpensi Penggugat untuk seluruhnya” dated 16 September 2014 – repudiate plaintiff claim.</li> </ul>	
<p><b>Criteria 4.3</b>  The unit of certification contributes to local sustainable development as agreed by local communities.</p>			
<p>4.3.1</p>	<p>Contributions to community development that are based on the results of consultation with local communities are demonstrated.</p>	<p>Based on public consultation with related stakeholder during the audit such as village head and community leader from Pekan Tolan, Menanti, Air Merah and Tanjung Medan Village, obtained information that the company has help the local communities especially in road maintenance activities. The road maintenances usually propose by village head.</p> <p>The company also provides regular donation for religious celebrations, repairs / construction of worship places, education and sports events organized by village youth groups. The record of donation and corporate social responsibility are in places.</p>	<p>Comply</p>
<p><b>Criteria 4.4</b>  Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.</p>			
<p>4.4.1</p>	<p><b>(C)</b> Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents related to the history of land tenure</p>	<p>PT. Tolan Tiga Indonesia has demonstated the document relevants legal requirement, such as:  Land Title Right documents:</p> <ul style="list-style-type: none"> <li>• Hand over Agreement between Indonesian Government and Societe Internationale de Plantations Et de Finnance S.A-SIPEF (Belgium), dated 19 April 1968 for 3,000 Ha</li> </ul>	<p>Comply</p>

	<p>and the actual legal or customary use of the land are available.</p>	<p>and 7,031.27 Ha.</p> <ul style="list-style-type: none"> <li>• "Risalah Pemeriksaan Tanah dari Panitia "B" No. 40/PPT/B/69", dated 17 December 1968 and "Risalah Pemeriksaan Tanah dari Panitia "B" No.48/PPT/B/71", dated 7 December 1971.</li> <li>• "Fatwa Tata Guna Tanah berdasarkan Surat Kepala Inspeksi Badan Pertanahan Nasional Sumatera Utara", dated 18 April 1970.</li> <li>• The last renewal "Ijin Usaha Tetap-IUT No.394/T/Kehutanan-Perkebunan/1998", dated 21 Agustus 1998, for 8,479.06 Ha.</li> <li>• "Surat Pendaftaran Usaha Perkebunan (Operational Busines permit) No.213/Menhutbun-VII/2000", dated 10 March 2000 for 8,479.06 Ha with Mill capacity 75 tonnes FFB/hour and Mill capacity permit 60 tonnes FFB/hour.</li> <li>• Land Title rights (HGU) from Badan Pertanahan Nasional/BPN (National Land Authority) No.SK.80/HGU/DA/97, dated 16 July 1997 (6,042.44 Ha), this was divided into 4,807.02 Ha as Perlabian Estate and 1,235.42 Ha for Tolan Estate.</li> <li>• Land title rights (HGU) from BPN (National land Authority) No.86/HGU/BPN/97, dated 23rd July 1997 for 2,436.62 Ha in the entirety under Tolan Estate.</li> <li>• The total certified land; from the Hak Guna Usaha/HGU for Perlabian Estate was 4,807.02 Ha and for Tolan Estate was 3,672.04 Ha</li> </ul> <p>Certificate holder concession and its supply bases which is Perlabian and Tolan Tiga Estate had established since the Dutch era approximately since 1919 under Anglo Dutch Estates Agency. After the Indonesian independence day, all Dutch concession especially Anglo Dutch Agency nationalized by Indonesian government according to the national act No. 86 year 1958 dated 27 December 1958 regarding to <i>Nasionalisasi Perusahaan-Perusahaan Milik Belanda (Nationalization of Dutch Companies)</i> and Government Regulation No. 19 year 1959 regarding <i>Penentuan Perusahaan Pertanian/Perkebunan Milik Belanda Yang Dikenakan Nasionalisasi (Determination of Dutch-Owned Agricultural / Plantation Companies that Were Nationalized)</i>. After that nationalization process, all concession of SIPEF run by Indonesian Government.</p> <p>On 29 April 1968, Société Internationale de Plantations et de Finance (SIPEF Group) under PT Tolan Tiga Indonesia has got concession from Indonesian Government.</p>	
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		<p>PT Tolan Tiga Indonesia itself was established within the framework of the Foreign Capital Investment Loan No. 1 year 1967, based upon notarial deed No. 40 dated September 7, 1961 of Professor Meester Raden Soedja, public notary in Jakarta. The deed of establishment was approved by the Minister of Justice in his decision letter No. J.A 5/98/22 dated September 21, 1961 and was published in State Gazette of the Republic of Indonesia No. 97 dated December 5, 1961, Supplement No. 650</p> <p>Based on document verification (land title and plantation permit) known that there was no new expansion since the concession has taking over from Dutch Company - Anglo Dutch Estates Agency by Indonesian Government on 1958 until now.</p> <p>According to public consultation result with surrounding communities during the audit such as village head and community leader from Pekan Tolan, Menanti, Air Merah and Tanjung Medan Village, obtained information that there was no land acquisition process from community land by the company because all company concessions had existed since the Dutch era. There is no previous land owner existed.</p> <p>PT. Tolan Tiga Indonesia attended claim over land, coming from community members from Kecamatan Bilah Hulu district, Labuhanbatu Selatan regency. The claim was for land of 716.40 Ha in Tolan Estate, however the claimant cannot point the exact location of disputed area.</p> <p>Document sighted:</p> <ul style="list-style-type: none"> <li>○ "Surat Kepolisian Negara Republik Indonesia Daerah Sumatera Utara Resor Labuhanbatu No.B/7135/X/Bag Ops, dated 24 October 2018 related invitation for mediation. The mediation date 29 October 2018, for claim "Klaim Kelompok Tani Bersatu Dusun Menanti, Desa Meranti, Kecamatan Bilah Hulu, Kabupaten Labuhanbatu di areal HGU PT. Tolan Tiga Indonesia di Dusun Sri Pinang, Desa Perkebunan Perlabian, Kecamatan Kampung Rakyat, Kabupaten Labuhanbatu Selatan" of 716.40 Ha.</li> <li>○ Minutes of mediation meeting "Notulen Rapat Mediasi terkait Klaim Lahan Kelompok Tani Bersatu Dusun Menanti, Desa Meranti, Kecamatan Bilah Hulu, Kabupaten</li> </ul>	
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		<p>Labuhanbatu di areal HGU PT. Tolan Tiga Indonesia di Dusun Sri Pinang, Desa Perkebunan Perlavian, Kecamatan Kampung Rakyat, Kabupaten Labuhanbatu Selatan”, dated 29 October 2018. Conclusion: “Polres Labuhanbatu akan mengadakan koordinasi dengan Pemerintah Kabupaten Labuhanbatu Selatan/Bupati dalam upaya penyelesaian sengketa lahan. Akan dilakukan pertemuan/mediasi lanjutan menunggu hasil koordinasi dengan pihak Pemerintah Kabupaten Labuhanbatu Selatan dan akan mengundang pihak yang bersengketa. Kepada pihak yang bersengketa agar bersama-sama menciptakan kamtibmas yang kondusif” – police will made subsequent coordination meeting with government from Labuhanbatu Selatan regency, for all parties to maintain security and conducive situation.</p> <ul style="list-style-type: none"> <li>○ Copy of State Court Decision for the same case in 2014, which resulted in have been sighted “Salinan Putusan Pengadilan Negeri Rantauprapat – Perkara Perdata Gugatan Reg.No.56/PDt.G/2013/PN-RAP antara Kelompok Tani Bersaru (KTB) Penggugat lawan PT. Tolan Tiga Indonesia (SIPEF) Dkk Tergugat. Dalam Pokok Perkara: Menyatakan Gugatan Penggugat tidak dapat diterima (Niet Onvankikje ver klaard). Dalam Rekonpensi: Menolak Gugatan Rekonpensi Penggugat untuk seluruhnya” dated 16 September 2014 – repudiate plaintiff claim.</li> </ul>	
4.4.2	<p>Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:</p> <p>4.4.2a Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities’ and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making</p>	<p>According to explanation the previous indicator known that there is no land acquisition process. All company concessions had existed since the Dutch era.</p>	Comply

	<p>4.4.2b Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken</p>	<p>According to explanation the previous indicator known that there is no land acquisition process. All company concessions had existed since the Dutch era.</p>	
	<p>4.4.2c Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land.</p>	<p>According to explanation the previous indicator known that there is no land acquisition process. All company concessions had existed since the Dutch era.</p>	
<p>4.4.3</p>	<p><b>(C)</b> Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).</p>	<p>According to explanation the previous indicator known that there is no land acquisition process. All company concessions had existed since the Dutch era.</p>	<p>Comply</p>
<p>4.4.4</p>	<p>All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.</p>	<p>According to explanation the previous indicator known that there is no land acquisition process. All company concessions had existed since the Dutch era.</p>	<p>Comply</p>
<p>4.4.5</p>	<p><b>(C)</b> Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.</p>	<p>According to explanation the previous indicator known that there is no land acquisition process. All company concessions had existed since the Dutch era.</p>	<p>Comply</p>
<p>4.4.6</p>	<p>There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.</p>	<p>According to explanation the previous indicator known that there is no land acquisition process. All company concessions had existed since the colonial era.</p>	<p>Comply</p>

**Criteria 4.5**

No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.

<p>4.5.1</p>	<p><b>(C)</b> Documents showing identification and assessment of demonstrable legal, customary and user rights are available.</p>	<p>Currently, during Re-certification assessment, unit of certification has no land extension or land compensation process from the certified area. Unit of Certification has obtaining Land Title as mentioned in Indicator 4.4.1 above.</p> <p>However, unit of certification has had FPIC mechanism related land compensation, which described in Land and Planting Compensation Inside Location Permit Of The Company No. LCA 01-01/01-02-2019/Rev 0, dated 18 February 2019.</p> <p>Based on the results of public consultation with the surrounding villages stated that during the few last years have been no reports from the public related to land disputes between the community and the company.</p> <p>Based on document verification (land title and plantation permit) known that there was no new expansion since the concession has taking over from Dutch Company - Anglo Dutch Estates Agency by Indonesian Government on 1958 until now.</p> <p>According to public consultation result with surrounding communities during the audit such as village head and community leader from Pekan Tolan, Menanti, Air Merah and Tanjung Medan Village, obtained information that there was no land acquisition process from community land by the company because all company concessions had existed since the Dutch era. There is no previous land owner existed.</p> <p>PT. Tolan Tiga Indonesia attended claim over land, coming from community members from Kecamatan Bilah Hulu district, Labuhanbatu Selatan regency. The claim was for land of 716.40 Ha in Tolan Estate, however the claimant cannot point the exact location of disputed area.</p> <p>Document sighted:</p> <ul style="list-style-type: none"> <li>o "Surat Kepolisian Negara Republik Indonesia Daerah Sumatera Utara Resor Labuhanbatu No.B/7135/X/Bag Ops, dated 24 October 2018 related invitation for mediation. The mediation date 29 October 2018, for claim "Klaim Kelompok Tani Bersatu Dusun Menanti, Desa Meranti, Kecamatan Bilah Hulu, Kabupaten Labuhanbatu di areal HGU PT. Tolan Tiga Indonesia di Dusun Sri Pinang, Desa Perkebunan Perlabian, Kecamatan Kampung Rakyat, Kabupaten Labuhanbatu Selatan" of 716.40 Ha.</li> </ul>	<p>Comply</p>
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		<ul style="list-style-type: none"> <li>○ Minutes of mediation meeting “Notulen Rapat Mediasi terkait Klaim Lahan Kelompok Tani Bersatu Dusun Menanti, Desa Meranti, Kecamatan Bilah Hulu, Kabupaten Labuhanbatu di areal HGU PT. Tolan Tiga Indonesia di Dusun Sri Pinang, Desa Perkebunan Perlabian, Kecamatan Kampung Rakyat, Kabupaten Labuhanbatu Selatan”, dated 29 October 2018. Conclusion: “Polres Labuhanbatu akan mengadakan koordinasi dengan Pemerintah Kabupaten Labuhanbatu Selatan/Bupati dalam upaya penyelesaian sengketa lahan. Akan dilakukan pertemuan/mediasi lanjutan menunggu hasil koordinasi dengan pihak Pemerintah Kabupaten Labuhanbatu Selatan dan akan mengundang pihak yang bersengketa. Kepada pihak yang bersengketa agar bersama-sama menciptakan kamtibmas yang kondusif” – police will made subsequent coordination meeting with government from Labuhanbatu Selatan regency, for all parties to maintain security and conducive situation.</li> <li>○ Copy of State Court Decision for the same case in 2014, which resulted in have been sighted “Salinan Putusan Pengadilan Negeri Rantauprapat – Perkara Perdata Gugatan Reg.No.56/PDt.G/2013/PN-RAP antara Kelompok Tani Bersaru (KTB) Penggugat lawan PT. Tolan Tiga Indonesia (SIPEF) Dkk Tergugat. Dalam Pokok Perkara: Menyatakan Gugatan Penggugat tidak dapat diterima (Niet Onvankikje ver klaard). Dalam Rekonpensi: Menolak Gugatan Rekonpensi Penggugat untuk seluruhnya” dated 16 September 2014 – repudiate plaintiff claim.</li> </ul>	
4.5.2	<p><b>(C)</b> FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities’ own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.</p>	<p>Based on document verification (land title and plantation permit) known that there was no new expansion since the concession has taking over from Dutch Company - Anglo Dutch Estates Agency by Indonesian Government on 1958 until now.</p> <p>According to public consultation result with surrounding communities during the audit such as village head and community leader from Pekan Tolan, Menanti, Air Merah and Tanjung Medan Village, obtained information that there was no land acquisition process from community land by the company because all company concessions had existed since the Dutch era. There is no previous land owner existed.</p> <p>PT. Tolan Tiga Indonesia attended claim over land, coming from community members from Kecamatan Bilah Hulu district, Labuhanbatu Selatan regency. The claim was for land</p>	Comply

		<p>of 716.40 Ha in Tolan Estate, however the claimant cannot point the exact location of disputed area.  Document sighted:</p> <ul style="list-style-type: none"> <li>○ "Surat Kepolisian Negara Republik Indonesia Daerah Sumatera Utara Resor Labuhanbatu No.B/7135/X/Bag Ops, dated 24 October 2018 related invitation for mediation. The mediation date 29 October 2018, for claim "Klaim Kelompok Tani Bersatu Dusun Menanti, Desa Meranti, Kecamatan Bilah Hulu, Kabupaten Labuhanbatu di areal HGU PT. Tolan Tiga Indonesia di Dusun Sri Pinang, Desa Perkebunan Perlabian, Kecamatan Kampung Rakyat, Kabupaten Labuhanbatu Selatan" of 716.40 Ha.</li> <li>○ Minutes of mediation meeting "Notulen Rapat Mediasi terkait Klaim Lahan Kelompok Tani Bersatu Dusun Menanti, Desa Meranti, Kecamatan Bilah Hulu, Kabupaten Labuhanbatu di areal HGU PT. Tolan Tiga Indonesia di Dusun Sri Pinang, Desa Perkebunan Perlabian, Kecamatan Kampung Rakyat, Kabupaten Labuhanbatu Selatan", dated 29 October 2018. Conclusion: "Polres Labuhanbatu akan mengadakan koordinasi dengan Pemerintah Kabupaten Labuhanbatu Selatan/Bupati dalam upaya penyelesaian sengketa lahan. Akan dilakukan pertemuan/mediasi lanjutan menunggu hasil koordinasi dengan pihak Pemerintah Kabupaten Labuhanbatu Selatan dan akan mengundang pihak yang bersengketa. Kepada pihak yang bersengketa agar bersama-sama menciptakan kamtibmas yang kondusif" – police will made subsequent coordination meeting with government from Labuhanbatu Selatan regency, for all parties to maintain security and conducive situation.</li> <li>○ Copy of State Court Decision for the same case in 2014, which resulted in have been sighted "Salinan Putusan Pengadilan Negeri Rantauprapat – Perkara Perdata Gugatan Reg.No.56/PDt.G/2013/PN-RAP antara Kelompok Tani Bersaru (KTB) Penggugat lawan PT. Tolan Tiga Indonesia (SIPEF) Dkk Tergugat. Dalam Pokok Perkara: Menyatakan Gugatan Penggugat tidak dapat diterima (Niet Onvankikje ver klaard). Dalam Rekonpensi: Menolak Gugatan Rekonpensi Penggugat untuk seluruhnya" dated 16 September 2014 – repudiate plaintiff claim.</li> </ul>	
4.5.3	Evidence is available that affected local peoples understand they have the right to say 'no'	Based on document verification (land title and plantation permit) known that there was no new expansion since the concession has taking over from Dutch Company - Anglo Dutch	Comply

	<p>to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p>	<p>Estates Agency by Indonesian Government on 1958 until now.</p> <p>According to public consultation result with surrounding communities during the audit such as village head and community leader from Pekan Tolan, Menanti, Air Merah and Tanjung Medan Village, obtained information that there was no land acquisition process from community land by the company because all company concessions had existed since the Dutch era. There is no previous land owner existed.</p> <p>PT. Tolan Tiga Indonesia attended claim over land, coming from community members from Kecamatan Bilah Hulu district, Labuhanbatu Selatan regency. The claim was for land of 716.40 Ha in Tolan Estate, however the claimant cannot point the exact location of disputed area.</p> <p>Document sighted:</p> <ul style="list-style-type: none"> <li>o "Surat Kepolisian Negara Republik Indonesia Daerah Sumatera Utara Resor Labuhanbatu No.B/7135/X/Bag Ops, dated 24 October 2018 related invitation for mediation. The mediation date 29 October 2018, for claim "Klaim Kelompok Tani Bersatu Dusun Menanti, Desa Meranti, Kecamatan Bilah Hulu, Kabupaten Labuhanbatu di areal HGU PT. Tolan Tiga Indonesia di Dusun Sri Pinang, Desa Perkebunan Perlabian, Kecamatan Kampung Rakyat, Kabupaten Labuhanbatu Selatan" of 716.40 Ha.</li> <li>o Minutes of mediation meeting "Notulen Rapat Mediasi terkait Klaim Lahan Kelompok Tani Bersatu Dusun Menanti, Desa Meranti, Kecamatan Bilah Hulu, Kabupaten Labuhanbatu di areal HGU PT. Tolan Tiga Indonesia di Dusun Sri Pinang, Desa Perkebunan Perlabian, Kecamatan Kampung Rakyat, Kabupaten Labuhanbatu Selatan", dated 29 October 2018. Conclusion: "Polres Labuhanbatu akan mengadakan koordinasi dengan Pemerintah Kabupaten Labuhanbatu Selatan/Bupati dalam upaya penyelesaian sengketa lahan. Akan dilakukan pertemuan/mediasi lanjutan menunggu hasil koordinasi dengan pihak Pemerintah Kabupaten Labuhanbatu Selatan dan akan mengundang pihak yang bersengketa. Kepada pihak yang bersengketa agar bersama-sama menciptakan kamtibmas yang kondusif" – police will made subsequent coordination meeting with government from Labuhanbatu Selatan regency, for all parties to maintain security and conducive</li> </ul>	
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		<p>situation.</p> <ul style="list-style-type: none"> <li>○ Copy of State Court Decision for the same case in 2014, which resulted in have been sighted "Salinan Putusan Pengadilan Negeri Rantauprapat – Perkara Perdata Gugatan Reg.No.56/PDt.G/2013/PN-RAP antara Kelompok Tani Bersaru (KTB) Penggugat lawan PT. Tolan Tiga Indonesia (SIPEF) Dkk Tergugat. Dalam Pokok Perkara: Menyatakan Gugatan Penggugat tidak dapat diterima (Niet Onvankikje ver klaard). Dalam Rekonpensi: Menolak Gugatan Rekonpensi Penggugat untuk seluruhnya" dated 16 September 2014 – repudiate plaintiff claim.</li> </ul>	
<p>4.5.4</p>	<p>To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.</p>	<p>Based on document verification (land title and plantation permit) known that there was no new expansion since the concession has taking over from Dutch Company - Anglo Dutch Estates Agency by Indonesian Government on 1958 until now.</p> <p>According to public consultation result with surrounding communities during the audit such as village head and community leader from Pekan Tolan, Menanti, Air Merah and Tanjung Medan Village, obtained information that there was no land acquisition process from community land by the company because all company concessions had existed since the Dutch era. There is no previous land owner existed.</p> <p>PT. Tolan Tiga Indonesia attended claim over land, coming from community members from Kecamatan Bilah Hulu district, Labuhanbatu Selatan regency. The claim was for land of 716.40 Ha in Tolan Estate, however the claimant cannot point the exact location of disputed area.</p> <p>Document sighted:</p> <ul style="list-style-type: none"> <li>○ "Surat Kepolisian Negara Republik Indonesia Daerah Sumatera Utara Resor Labuhanbatu No.B/7135/X/Bag Ops, dated 24 October 2018 related invitation for mediation. The mediation date 29 October 2018, for claim "Klaim Kelompok Tani Bersatu Dusun Menanti, Desa Meranti, Kecamatan Bilah Hulu, Kabupaten Labuhanbatu di areal HGU PT. Tolan Tiga Indonesia di Dusun Sri Pinang, Desa Perkebunan Perlabian, Kecamatan Kampung Rakyat, Kabupaten Labuhanbatu Selatan" of 716.40 Ha.</li> <li>○ Minutes of mediation meeting "Notulen Rapat Mediasi terkait Klaim Lahan Kelompok Tani Bersatu Dusun Menanti, Desa Meranti, Kecamatan Bilah Hulu, Kabupaten</li> </ul>	<p>Comply</p>



		<p>Labuhanbatu di areal HGU PT. Tolan Tiga Indonesia di Dusun Sri Pinang, Desa Perkebunan Perlavian, Kecamatan Kampung Rakyat, Kabupaten Labuhanbatu Selatan”, dated 29 October 2018. Conclusion: “Polres Labuhanbatu akan mengadakan koordinasi dengan Pemerintah Kabupaten Labuhanbatu Selatan/Bupati dalam upaya penyelesaian sengketa lahan. Akan dilakukan pertemuan/mediasi lanjutan menunggu hasil koordinasi dengan pihak Pemerintah Kabupaten Labuhanbatu Selatan dan akan mengundang pihak yang bersengketa. Kepada pihak yang bersengketa agar bersama-sama menciptakan kamtibmas yang kondusif” – police will made subsequent coordination meeting with government from Labuhanbatu Selatan regency, for all parties to maintain security and conducive situation.</p> <ul style="list-style-type: none"> <li>○ Copy of State Court Decision for the same case in 2014, which resulted in have been sighted “Salinan Putusan Pengadilan Negeri Rantauprapat – Perkara Perdata Gugatan Reg.No.56/PDt.G/2013/PN-RAP antara Kelompok Tani Bersaru (KTB) Penggugat lawan PT. Tolan Tiga Indonesia (SIPEF) Dkk Tergugat. Dalam Pokok Perkara: Menyatakan Gugatan Penggugat tidak dapat diterima (Niet Onvankikje ver klaard). Dalam Rekonpensi: Menolak Gugatan Rekonpensi Penggugat untuk seluruhnya” dated 16 September 2014 – repudiate plaintiff claim.</li> </ul>	
4.5.5	<p>Evidence is available that the affected communities and rights holders have had the option to 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.</p>	<p>Based on document verification (land title and plantation permit) known that there was no new expansion since the concession has taking over from Dutch Company - Anglo Dutch Estates Agency by Indonesian Government on 1958 until now.</p> <p>According to public consultation result with surrounding communities during the audit such as village head and community leader from Pekan Tolan, Menanti, Air Merah and Tanjung Medan Village, obtained information that there was no land acquisition process from community land by the company because all company concessions had existed since the Dutch era. There is no previous land owner existed.</p> <p>PT. Tolan Tiga Indonesia attended claim over land, coming from community members from Kecamatan Bilah Hulu district, Labuhanbatu Selatan regency. The claim was for land of 716.40 Ha in Tolan Estate, however the claimant cannot point the exact location of disputed area.</p> <p>Document sighted:</p>	Comply

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		<ul style="list-style-type: none"> <li>○ "Surat Kepolisian Negara Republik Indonesia Daerah Sumatera Utara Resor Labuhanbatu No.B/7135/X/Bag Ops, dated 24 October 2018 related invitation for mediation. The mediation date 29 October 2018, for claim "Klaim Kelompok Tani Bersatu Dusun Menanti, Desa Meranti, Kecamatan Bilah Hulu, Kabupaten Labuhanbatu di areal HGU PT. Tolan Tiga Indonesia di Dusun Sri Pinang, Desa Perkebunan Perlabian, Kecamatan Kampung Rakyat, Kabupaten Labuhanbatu Selatan" of 716.40 Ha.</li> <li>○ Minutes of mediation meeting "Notulen Rapat Mediasi terkait Klaim Lahan Kelompok Tani Bersatu Dusun Menanti, Desa Meranti, Kecamatan Bilah Hulu, Kabupaten Labuhanbatu di areal HGU PT. Tolan Tiga Indonesia di Dusun Sri Pinang, Desa Perkebunan Perlabian, Kecamatan Kampung Rakyat, Kabupaten Labuhanbatu Selatan", dated 29 October 2018. Conclusion: "Polres Labuhanbatu akan mengadakan koordinasi dengan Pemerintah Kabupaten Labuhanbatu Selatan/Bupati dalam upaya penyelesaian sengketa lahan. Akan dilakukan pertemuan/mediasi lanjutan menunggu hasil koordinasi dengan pihak Pemerintah Kabupaten Labuhanbatu Selatan dan akan mengundang pihak yang bersengketa. Kepada pihak yang bersengketa agar bersama-sama menciptakan kamtibmas yang kondusif" – police will made subsequent coordination meeting with government from Labuhanbatu Selatan regency, for all parties to maintain security and conducive situation.</li> <li>○ Copy of State Court Decision for the same case in 2014, which resulted in have been sighted "Salinan Putusan Pengadilan Negeri Rantauprapat – Perkara Perdata Gugatan Reg.No.56/PDt.G/2013/PN-RAP antara Kelompok Tani Bersaru (KTB) Penggugat lawan PT. Tolan Tiga Indonesia (SIPEF) Dkk Tergugat. Dalam Pokok Perkara: Menyatakan Gugatan Penggugat tidak dapat diterima (Niet Onvankikje ver klaard). Dalam Rekonpensi: Menolak Gugatan Rekonpensi Penggugat untuk seluruhnya" dated 16 September 2014 – repudiate plaintiff claim.</li> </ul>	
4.5.6	Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.	Based on document verification (land title and plantation permit) known that there was no new expansion since the concession has taking over from Dutch Company - Anglo Dutch Estates Agency by Indonesian Government on 1958 until now.  According to public consultation result with surrounding communities during the audit	Comply

		<p>such as village head and community leader from Pekan Tolan, Menanti, Air Merah and Tanjung Medan Village, obtained information that there was no land acquisition process from community land by the company because all company concessions had existed since the Dutch era. There is no previous land owner existed.</p> <p>PT. Tolan Tiga Indonesia attended claim over land, coming from community members from Kecamatan Bilah Hulu district, Labuhanbatu Selatan regency. The claim was for land of 716.40 Ha in Tolan Estate, however the claimant cannot point the exact location of disputed area.</p> <p>Document sighted:</p> <ul style="list-style-type: none"> <li>○ "Surat Kepolisian Negara Republik Indonesia Daerah Sumatera Utara Resor Labuhanbatu No.B/7135/X/Bag Ops, dated 24 October 2018 related invitation for mediation. The mediation date 29 October 2018, for claim "Klaim Kelompok Tani Bersatu Dusun Menanti, Desa Meranti, Kecamatan Bilah Hulu, Kabupaten Labuhanbatu di areal HGU PT. Tolan Tiga Indonesia di Dusun Sri Pinang, Desa Perkebunan Perlabian, Kecamatan Kampung Rakyat, Kabupaten Labuhanbatu Selatan" of 716.40 Ha.</li> <li>○ Minutes of mediation meeting "Notulen Rapat Mediasi terkait Klaim Lahan Kelompok Tani Bersatu Dusun Menanti, Desa Meranti, Kecamatan Bilah Hulu, Kabupaten Labuhanbatu di areal HGU PT. Tolan Tiga Indonesia di Dusun Sri Pinang, Desa Perkebunan Perlabian, Kecamatan Kampung Rakyat, Kabupaten Labuhanbatu Selatan", dated 29 October 2018. Conclusion: "Polres Labuhanbatu akan mengadakan koordinasi dengan Pemerintah Kabupaten Labuhanbatu Selatan/Bupati dalam upaya penyelesaian sengketa lahan. Akan dilakukan pertemuan/mediasi lanjutan menunggu hasil koordinasi dengan pihak Pemerintah Kabupaten Labuhanbatu Selatan dan akan mengundang pihak yang bersengketa. Kepada pihak yang bersengketa agar bersama-sama menciptakan kamtibmas yang kondusif" – police will made subsequent coordination meeting with government from Labuhanbatu Selatan regency, for all parties to maintain security and conducive situation.</li> <li>○ Copy of State Court Decision for the same case in 2014, which resulted in have been sighted "Salinan Putusan Pengadilan Negeri Rantauprapat – Perkara Perdata Gugatan</li> </ul>	
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<p>4.5.7</p>	<p>New lands will not be acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations in the national interest without consent (eminent domain), except in cases of smallholders benefitting from agrarian reform or anti-drug programmes.</p>	<p>Based on document verification (land title and plantation permit) known that there was no new expansion since the concession has taking over from Dutch Company - Anglo Dutch Estates Agency by Indonesian Government on 1958 until now.</p> <p>According to public consultation result with surrounding communities during the audit such as village head and community leader from Pekan Tolan, Menanti, Air Merah and Tanjung Medan Village, obtained information that there was no land acquisition process from community land by the company because all company concessions had existed since the Dutch era. There is no previous land owner existed.</p> <p>PT. Tolan Tiga Indonesia attended claim over land, coming from community members from Kecamatan Bilah Hulu district, Labuhanbatu Selatan regency. The claim was for land of 716.40 Ha in Tolan Estate, however the claimant cannot point the exact location of disputed area.</p> <p>Document sighted:</p> <ul style="list-style-type: none"> <li>○ "Surat Kepolisian Negara Republik Indonesia Daerah Sumatera Utara Resor Labuhanbatu No.B/7135/X/Bag Ops, dated 24 October 2018 related invitation for mediation. The mediation date 29 October 2018, for claim "Klaim Kelompok Tani Bersatu Dusun Menanti, Desa Meranti, Kecamatan Bilah Hulu, Kabupaten Labuhanbatu di areal HGU PT. Tolan Tiga Indonesia di Dusun Sri Pinang, Desa Perkebunan Perlabian, Kecamatan Kampung Rakyat, Kabupaten Labuhanbatu Selatan" of 716.40 Ha.</li> <li>○ Minutes of mediation meeting "Notulen Rapat Mediasi terkait Klaim Lahan Kelompok Tani Bersatu Dusun Menanti, Desa Meranti, Kecamatan Bilah Hulu, Kabupaten Labuhanbatu di areal HGU PT. Tolan Tiga Indonesia di Dusun Sri Pinang, Desa Perkebunan Perlabian, Kecamatan Kampung Rakyat, Kabupaten Labuhanbatu Selatan", dated 29 October 2018. Conclusion: "Polres Labuhanbatu akan</li> </ul>	<p>Comply</p>

		<p>mengadakan koordinasi dengan Pemerintah Kabupaten Labuhanbatu Selatan/Bupati dalam upaya penyelesaian sengketa lahan. Akan dilakukan pertemuan/mediasi lanjutan menunggu hasil koordinasi dengan pihak Pemerintah Kabupaten Labuhanbatu Selatan dan akan mengundang pihak yang bersengketa. Kepada pihak yang bersengketa agar bersama-sama menciptakan kamtibmas yang kondusif” – police will made subsequent coordination meeting with government from Labuhanbatu Selatan regency, for all parties to maintain security and conducive situation.</p> <ul style="list-style-type: none"> <li>o Copy of State Court Decision for the same case in 2014, which resulted in have been sighted “Salinan Putusan Pengadilan Negeri Rantauprapat – Perkara Perdata Gugatan Reg.No.56/PDt.G/2013/PN-RAP antara Kelompok Tani Bersaru (KTB) Penggugat lawan PT. Tolan Tiga Indonesia (SIPEF) Dkk Tergugat. Dalam Pokok Perkara: Menyatakan Gugatan Penggugat tidak dapat diterima (Niet Onvankikje ver klaard). Dalam Rekonpensi: Menolak Gugatan Rekonpensi Penggugat untuk seluruhnya” dated 16 September 2014 – repudiate plaintiff claim.</li> </ul>	
4.5.8	<p><b>(C)</b> New lands are not acquired in areas inhabited by communities in voluntary isolation.</p>	<p>Based on document verification (land title and plantation permit) known that there was no new expansion since the concession has taking over from Dutch Company - Anglo Dutch Estates Agency by Indonesian Government on 1958 until now.</p> <p>According to public consultation result with surrounding communities during the audit such as village head and community leader from Pekan Tolan, Menanti, Air Merah and Tanjung Medan Village, obtained information that there was no land acquisition process from community land by the company because all company concessions had existed since the Dutch era. There is no previous land owner existed.</p> <p>PT. Tolan Tiga Indonesia attended claim over land, coming from community members from Kecamatan Bilah Hulu district, Labuhanbatu Selatan regency. The claim was for land of 716.40 Ha in Tolan Estate, however the claimant cannot point the exact location of disputed area.</p> <p>Document sighted:</p> <ul style="list-style-type: none"> <li>o “Surat Kepolisian Negara Republik Indonesia Daerah Sumatera Utara Resor Labuhanbatu No.B/7135/X/Bag Ops, dated 24 October 2018 related invitation for</li> </ul>	Comply

		<p>mediation. The mediation date 29 October 2018, for claim "Klaim Kelompok Tani Bersatu Dusun Menanti, Desa Meranti, Kecamatan Bilah Hulu, Kabupaten Labuhanbatu di areal HGU PT. Tolan Tiga Indonesia di Dusun Sri Pinang, Desa Perkebunan Perlabian, Kecamatan Kampung Rakyat, Kabupaten Labuhanbatu Selatan" of 716.40 Ha.</p> <ul style="list-style-type: none"> <li>○ Minutes of mediation meeting "Notulen Rapat Mediasi terkait Klaim Lahan Kelompok Tani Bersatu Dusun Menanti, Desa Meranti, Kecamatan Bilah Hulu, Kabupaten Labuhanbatu di areal HGU PT. Tolan Tiga Indonesia di Dusun Sri Pinang, Desa Perkebunan Perlabian, Kecamatan Kampung Rakyat, Kabupaten Labuhanbatu Selatan", dated 29 October 2018. Conclusion: "Polres Labuhanbatu akan mengadakan koordinasi dengan Pemerintah Kabupaten Labuhanbatu Selatan/Bupati dalam upaya penyelesaian sengketa lahan. Akan dilakukan pertemuan/mediasi lanjutan menunggu hasil koordinasi dengan pihak Pemerintah Kabupaten Labuhanbatu Selatan dan akan mengundang pihak yang bersengketa. Kepada pihak yang bersengketa agar bersama-sama menciptakan kamtibmas yang kondusif" – police will made subsequent coordination meeting with government from Labuhanbatu Selatan regency, for all parties to maintain security and conducive situation.</li> <li>○ Copy of State Court Decision for the same case in 2014, which resulted in have been sighted "Salinan Putusan Pengadilan Negeri Rantauprapat – Perkara Perdata Gugatan Reg.No.56/PDt.G/2013/PN-RAP antara Kelompok Tani Bersaru (KTB) Penggugat lawan PT. Tolan Tiga Indonesia (SIPEF) Dkk Tergugat. Dalam Pokok Perkara: Menyatakan Gugatan Penggugat tidak dapat diterima (Niet Onvankijke ver klaard). Dalam Rekonpensi: Menolak Gugatan Rekonpensi Penggugat untuk seluruhnya" dated 16 September 2014 – repudiate plaintiff claim.</li> </ul>	
<p><b>Criteria 4.6</b>  Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.</p>			
<p>4.6.1</p>	<p><b>(C)</b> A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.</p>	<p>According to the HCV assessment report that conducted on 2009 in PT Tolan Tiga Indonesia concluded that there is no customary rights near the concession areas. The same information also obtained in SIA reports on 2010.</p>	<p>Comply</p>

		Based on that fact, there is no need documented negotiations concerning compensation for loss of legal, customary or user rights with local communities/customary people or other stakeholders.	
4.6.2	<b>(C)</b> A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.	Refer to previous indicator, there is no customary rights near the concession areas, there is no need documented negotiations concerning compensation for loss of legal, customary or user rights with local communities/customary people or other stakeholders.	Comply
4.6.3	Evidence is available that equal opportunities are provided to both men and women to hold land titles for small holdings.	Refer to previous indicator, there is no customary rights near the concession areas, there is no need documented negotiations concerning compensation for loss of legal, customary or user rights with local communities/customary people or other stakeholders.	Comply
4.6.4	The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.	Refer to previous indicator, there is no customary rights near the concession areas, there is no need documented negotiations concerning compensation for loss of legal, customary or user rights with local communities/customary people or other stakeholders.	Comply
<b>Criteria 4.7</b>			
Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.			
4.7.1	<b>(C)</b> A mutually agreed procedure for identifying people entitled to compensation is in place.	Certificate holder concession and its supply bases which is Perlabian and Tolan Tiga Estate had established since the Dutch era approximately since 1919 under Anglo Dutch Estates Agency. After the Indonesian independence day, all Dutch concession especially Anglo Dutch Agency nationalized by Indonesian government according to the national act No. 86 year 1958 dated 27 December 1958 regarding to <i>Nasionalisasi Perusahaan-Perusahaan Milik Belanda (Nationalization of Dutch Companies)</i> and Government Regulation No. 19 year 1959 regarding <i>Penentuan Perusahaan Pertanian/Perkebunan Milik Belanda Yang Dikenakan Nasionalisasi (Determination of Dutch-Owned Agricultural / Plantation Companies that Were Nationalized)</i> . After that nationalization process, all concession of SIPEF run by Indonesian Government.	Comply

		<p>On 29 April 1968, Société Internationale de Plantations et de Finance (SIPEF Group) under PT Tolan Tiga Indonesia has got concession from Indonesian Government.</p> <p>PT Tolan Tiga Indonesia itself was established within the framework of the Foreign Capital Investment Loan No. 1 year 1967, based upon notarial deed No. 40 dated September 7, 1961 of Professor Meester Raden Soedja, public notary in Jakarta. The deed of establishment was approved by the Minister of Justice in his decision letter No. J.A 5/98/22 dated September 21, 1961 and was published in State Gazette of the Republic of Indonesia No. 97 dated December 5, 1961, Supplement No. 650</p> <p>Based on document verification (land title and plantation permit) known that there was no new expansion since the concession has taking over from Dutch Company - Anglo Dutch Estates Agency by Indonesian Government on 1958 until now.</p> <p>According to public consultation result with surrounding communities during the audit such as village head and community leader from Pekan Tolan, Menanti, Air Merah and Tanjung Medan Village, obtained information that there was no land acquisition process from community land by the company because all company concessions had existed since the Dutch era. There is no previous land owner existed.</p> <p>PT. Tolan Tiga Indonesia attended claim over land, coming from community members from Kecamatan Bilah Hulu district, Labuhanbatu Selatan regency. The claim was for land of 716.40 Ha in Tolan Estate, however the claimant cannot point the exact location of disputed area.</p> <p>Document sighted:</p> <ul style="list-style-type: none"> <li>o "Surat Kepolisian Negara Republik Indonesia Daerah Sumatera Utara Resor Labuhanbatu No.B/7135/X/Bag Ops, dated 24 October 2018 related invitation for mediation. The mediation date 29 October 2018, for claim "Klaim Kelompok Tani Bersatu Dusun Menanti, Desa Meranti, Kecamatan Bilah Hulu, Kabupaten Labuhanbatu di areal HGU PT. Tolan Tiga Indonesia di Dusun Sri Pinang, Desa Perkebunan Perlabian, Kecamatan Kampung Rakyat, Kabupaten Labuhanbatu Selatan" of 716.40 Ha.</li> </ul>	
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		<ul style="list-style-type: none"> <li>o Minutes of mediation meeting “Notulen Rapat Mediasi terkait Klaim Lahan Kelompok Tani Bersatu Dusun Menanti, Desa Meranti, Kecamatan Bilah Hulu, Kabupaten Labuhanbatu di areal HGU PT. Tolan Tiga Indonesia di Dusun Sri Pinang, Desa Perkebunan Perlabian, Kecamatan Kampung Rakyat, Kabupaten Labuhanbatu Selatan”, dated 29 October 2018. Conclusion: “Polres Labuhanbatu akan mengadakan koordinasi dengan Pemerintah Kabupaten Labuhanbatu Selatan/Bupati dalam upaya penyelesaian sengketa lahan. Akan dilakukan pertemuan/mediasi lanjutan menunggu hasil koordinasi dengan pihak Pemerintah Kabupaten Labuhanbatu Selatan dan akan mengundang pihak yang bersengketa. Kepada pihak yang bersengketa agar bersama-sama menciptakan kamtibmas yang kondusif” – police will made subsequent coordination meeting with government from Labuhanbatu Selatan regency, for all parties to maintain security and conducive situation.</li> <li>o Copy of State Court Decision for the same case in 2014, which resulted in have been sighted “Salinan Putusan Pengadilan Negeri Rantauprapat – Perkara Perdata Gugatan Reg.No.56/PDt.G/2013/PN-RAP antara Kelompok Tani Bersaru (KTB) Penggugat lawan PT. Tolan Tiga Indonesia (SIPEF) Dkk Tergugat. Dalam Pokok Perkara: Menyatakan Gugatan Penggugat tidak dapat diterima (Niet Onvankikje ver klaard). Dalam Rekonpensi: Menolak Gugatan Rekonpensi Penggugat untuk seluruhnya” dated 16 September 2014 – repudiate plaintiff claim.</li> </ul>	
4.7.2	<b>(C)</b> A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.	Refer to explanation on previous indicator, certificate holder no need to demonstrate or to show the evidence of FPIC and negotiated agreements.	Comply
4.7.3	Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.	Refer to explanation on previous indicator, certificate holder no need to demonstrate or to show the evidence of FPIC and negotiated agreements.	Comply
<b>Criteria 4.8</b>			
The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrated that they have legal customary, or user rights.			
4.8.1	Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually	Refer to HCV assessment report that conducted on 2009 in PT Eastern Sumatera Indonesia and PT Kerasaan Indonesia and on 2017 in PT Timbang Deli Indonesia	Comply

	<p>agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.</p>	<p>concluded that there is no customary rights near the concession areas. The same information also obtained in SIA/SEIA reports.</p> <p>Until this audit, certificate holder has had land title, plantation permit and other legal compliance against plantation business that covered whole concession and operational activity. There is no land acquisition process due to whole concession areas came from the Dutch concession. However, certificate holder has had grievance procedure as follows:</p> <ul style="list-style-type: none"> <li>• Procedure for internal complaint and grievance "Prosedur Keluh Kesah dengan Pihak Internal" Dok.No.SOP/TDI/07 dated 1 July 2017. The procedure explains steps to convey complaint and receive complaint from internal party, as well providing appropriate response. The document complemented with flow chart.</li> <li>• Procedure for external complaint and grievance "Prosedur Keluh Kesah dengan Pihak Eksternal" Dok.No.SOP/TDI/06, dated 1 July 2017. The procedure explains steps to convey complaint and receive complaint from internal party, as well providing appropriate response. The document complemented with flow chart.</li> </ul>	
<p>4.8.2</p>	<p><b>(C)</b> Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.</p>	<p>As explained in previous indicator (4.8.1), there is no land dispute cases until this audit. According to public consultation result with surrounding communities during the audit obtained information that there was no land acquisition process from community land by the company because all company concessions had existed since the Dutch era. There is no previous land owner existed.</p>	<p>Comply</p>
<p>4.8.3</p>	<p>Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use right, there claims will be settled using the relevant requirements (Indicator 4.4.2, 4.4.3 and 4.4.4)</p>	<p>As explained in previous indicator (4.8.1), there is no land dispute cases until this audit. According to public consultation result with surrounding communities during the audit obtained information that there was no land acquisition process from community land by the company because all company concessions had existed since the Dutch era. There is no previous land owner existed.</p>	<p>Comply</p>

4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in participatory way with involvement of affected parties (including neighbouring communities where applicable)	As explained in previous indicator (4.8.1), there is no land dispute cases until this audit. According to public consultation result with surrounding communities during the audit obtained information that there was no land acquisition process from community land by the company because all company concessions had existed since the Dutch era. There is no previous land owner existed.	Comply
<b>Principle 5: Support smallholder inclusion</b>			
Include smallholders in RSPO supply chains and improve their livelihoods through fair and transparent partnerships.			
<b>Criteria 5.1</b>			
The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			
5.1.1	Current and previous period prices paid for FFB are publicly available and accessible by smallholders.	PT Tolan Tiga Indonesia - Perlabian POM does not receive and process FFB from third-party sources. Perlabian POM was receiving FFB only from company owned source, Perlabian Estate and Tolan Estate. This indicator was not applicable for Perlabian POM.	N/A
5.1.2	<b>(C)</b> Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.	PT Tolan Tiga Indonesia - Perlabian POM does not receive and process FFB from third-party sources. Perlabian POM was receiving FFB only from company owned source, Perlabian Estate and Tolan Estate. This indicator was not applicable for Perlabian POM.	N/A
5.1.3	<b>(C)</b> Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.	PT Tolan Tiga Indonesia - Perlabian POM does not receive and process FFB from third-party sources. Perlabian POM was receiving FFB only from company owned source, Perlabian Estate and Tolan Estate. This indicator was not applicable for Perlabian POM.	N/A
5.1.4	<b>(C)</b> Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.	PT Tolan Tiga Indonesia - Perlabian POM does not receive and process FFB from third-party sources. Perlabian POM was receiving FFB only from company owned source, Perlabian Estate and Tolan Estate. This indicator was not applicable for Perlabian POM.	N/A
5.1.5	Contracts are fair, legal and transparent	PT Tolan Tiga Indonesia made work agreement with contractor for replanting: "Surat	Comply

	and have an agreed timeframe.	Perjanjian Kerja No.10/GMO-PLE/TG/V/2018 antara PT Tolan Tiga Indonesia dengan CV Tua Gabe tentang Replanting OP 2019”, dated 18 May 2018. Work agreement covers obligation of both parties, governing policies in PT. Tolan Tiga Indonesia (no child worker, HSE, legal compliance, etc.), work schedule, payment terms, sanction, dispute. Work specification in “Lampiran Spesifikasi Pekerjaan Replanting 2019 di PLE atas kontrak No.03/GMO-PLE/ASA/X/2019” whereby stipulates closing sanitation hole, ripping 2 rounds, felling, holing, hole closing, chipping, spreading palm stump. Replanting work schedule in “Program Replanting Oil Palm 2019”.	
5.1.6	<b>(C)</b> Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.	PT Tolan Tiga Indonesia made scheduled payment for replanting contractor based on work progress. Record sighted: invoice “Permohonan Pembayaran CV Tua Gabe No.97/TG/PLE/2018 atas SPK No.10/GMO-PLE/TG/V/2018” dated 20 December 2018. Payment for CV Tua Gabe dated 23 January 2019.	Comply
5.1.7	Weighing equipment is verified by an independent third party on a regular basis (this can be government).	Perlamban POM weighbridge certificate was evidence based on “Keterangan Hasil Pengujian” No. 414/PKTN.4.9/KHP/12/2019 dated 31 Dec 2019. Issued by Balai Standardisasi Metrologi Legal Regional I. Details: Electronic weighbridge capacity 40,000 kg; user PT Tolan Tiga Indonesia; Brand Avery Weigh Tronix; Type E.1205; S/N 111350583. “Keterangan Hasil Pengujian” No. 415/PKTN.4.9/KHP/12/2019 dated 31 Dec 2019. Issued by Balai Standardisasi Metrologi Legal Regional I. Details: Electronic weighbridge capacity 40,000 kg; user PT Tolan Tiga Indonesia; Brand Avery Weigh Tronix; Type E.1205; S/N 152650637. Both certificate valid until November 2020.	Comply
5.1.8	The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material.	The certificate holder has plan to develop partnership with independent smallholder to provide fertilizer, agrochemical and knowledge of good agriculture practice, include formed an organization for Internal Control System (ICS) such as farmer group or Cooperative. The unit certification will act as middleman in FFB sales from independent smallholder.	Comply
5.1.9	<b>(C)</b> The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.	The unit of certification has prepared the procedure External Grievance (HRA-04-02/01-02-2018/Rev.0) as guidance for external grievance management process including smallholders. Complainants can submit their complaints via email at <a href="http://www.tolantiga.co.id">http://www.tolantiga.co.id</a> or directly to the respective person. Person whom directly supervises the complainants should discuss with the complainants to solve the issue.	Comply

		Timeframe for resolving grievance is 30 days. It was evident grievance documentation under "Rekaman Keluh Kesah Internal & Eksternal". For example: from Head of Timbang Deli Village dated 6 <sup>th</sup> March 2020; has been responded by management on 10 <sup>th</sup> March 2020	
<b>Criteria 5.2</b>			
The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification.	The unit of certification has prepared procedure External Grievance (HRA-04-02/01-02-2018/Rev.0) as guidance for external grievance management process including smallholders. Complainants can submit their complaints via email at <a href="http://www.tolantiga.co.id">http://www.tolantiga.co.id</a> or directly to the respective person. Person whom directly supervises the complainants should discuss with the complainants to solve the issue.  Women and other partners as supply base of the certification unit are involved during assessment of the needs for support to develop the smallholder cooperative.	Comply
5.2.2	The unit of certification develops and implements livelihood improvement programmes, including at least capacity building to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder).	The unit of certification has implemented livelihood improvement programmes. The unit of certification provides technical guidance, financial credit, fertilizer support and receiving the FFB production from smallholder around the company	Comply
<b>PROCEDURAL NOTE:</b>			
The RSPO is currently developing a separate standard for Independent Smallholders.			
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	The unit of certification provides technical guidance, financial credit, fertilizer support and receiving the FFB production from smallholder around the company	Comply
5.2.4	<b>(C)</b> Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	Training of pesticide handling to the smallholders. Training of IPM (integrated pest management) was attended by all related staff and workers of pest management.	Comply
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the	PT Tolan Tiga Indonesia was regularly review and reported the progress of plantation. The report also described Production, Sales, Fertilizer applied, Agrochemical used and	Comply

	smallholder support programme.	Labour used.	
<b>Principle 6: respect workers' rights and conditions</b> Protect workers' rights and ensure safe and decent working conditions.			
<b>Criteria 6.1</b> Any form of discrimination is prohibited.			
6.1.1	<p><b>(C)</b> A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.</p>	<p>Certificate holder has had policy related to non-discrimination and equality. This policy signed by Board of Director on 10 June 2015. The policy stated:</p> <p><i>SIPEF is committed to a non-discriminatory workplace and will abide by the relevant Anti-discrimination and Equal Employment laws and regulations of the countries where it operates.</i></p> <ol style="list-style-type: none"> <li>1. <i>SIPEF is not discriminating against anyone during recruitment or in the performance of its business operations.</i></li> <li>2. <i>The company recruitment selection process is based on merit, so all applicants with the desired qualification and experience will be considered for the open position. The successful applicant will be the person who best meets the specific requirements of the position offered.</i></li> <li>3. <i>Promotions, but also sanctions, are handled on the same basis of non-discrimination.</i></li> <li>4. <i>Non-compliance with this policy will result in disciplinary action and might also result in legal action.</i></li> <li>5. <i>This Policy applies to all Companies under the Management of SIPEF.</i></li> </ol> <p>This policy can be seen and downloaded in SIPEF Website <a href="https://www.sipef.com/hq/sustainability/policies/equal-employment-opportunity-policy/">https://www.sipef.com/hq/sustainability/policies/equal-employment-opportunity-policy/</a></p> <p>Based on interview with labor union, gender committee and random worker in estates and mill obtained information that they has been informed towards the company policies. There is no discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. Annual employee appraisal has been conducted objectively. There was no</p>	Comply

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		complaints/grievance on this matter.	
6.1.2	<b>(C)</b> Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against. Evidence includes migrant workers' non-payment of recruitment fees.	According to public consultation result with surrounding communities during the audit such as village head and community leader from Pekan Tolan, Menanti, Air Merah and Tanjung Medan Village, obtained information that there is no discrimination for worker especially women worker from surrounding communities. There is no migrant worker in Perlabian Mill, Perlabian Estate or Tolan Tiga Estate.	Comply
6.1.3	The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.	<p>PT Tolan Tiga Indonesia has had guidance on human resources management in document "Human Resources Department Manual" that approved by top management (Principal Director) since 5 April 2019. The manual covering procedure such as:</p> <ul style="list-style-type: none"> <li>• General (HRD-00-01)</li> <li>• Organization Chart (HRD-00-02)</li> <li>• Objective and KPI (HRD-00-03)</li> <li>• Risk and Opportunities (HRD-00-04)</li> <li>• Recruitment in General (HRD-01-00)</li> <li>• Internal Recruitment (HRD-01-01) <ul style="list-style-type: none"> <li>○ Operating unit set Staff Employment Request and asked approval from GM/RD.</li> <li>○ Estate managers choose the best candidates from SKU to be recruited as staff. Selected candidates will participate in the selection by the training manager. Furthermore, candidates will follow the OJT for 6 months. Then GM / RD will provide an assessment of whether the candidate is eligible / not.</li> </ul> </li> <li>• External Recruitment (HRD-01-02) <ul style="list-style-type: none"> <li>○ The RMO / Head Department prepares SERs that are needed for HO, estate or mill.</li> <li>○ Publish job advertisements.</li> <li>○ Selection process (written test, psychological test, interview and health test).</li> <li>○ Negotiations and contracts</li> <li>○ Signing contracts</li> <li>○ Probation period 3 months.</li> <li>○ Graduation assessment by estate / mill manager.</li> </ul> </li> <li>• Recruitment for PKWT (HRD-01-03)</li> <li>• Training General Information (HRD-02-00)</li> </ul>	Comply

		<ul style="list-style-type: none"> <li>○ Identify training needs</li> <li>○ Plan and choose a training method</li> <li>○ Delivery of training</li> <li>○ Documentation and evaluation</li> <li>● Training for Trainee Assistant (HRD-02-01)</li> <li>● Training Evaluation (HRD-02-02)</li> <li>● Annual Training Budgeting (HRD-02-03)             <ul style="list-style-type: none"> <li>○ Training managers collect data on specific training needs from each department.</li> <li>○ Training manager sends training program proposals to HRD managers.</li> <li>○ The Principal Director approves / rejects the annual activity planning and training budget.</li> </ul> </li> <li>● Training/Seminar/Workshop/Request (HRD-02-04)</li> <li>● Training Carried by OU (HRD-02-05)             <ul style="list-style-type: none"> <li>○ Training manager distributed curriculum to OU's which will be basis of their annual training schedule.</li> <li>○ Estate manager create annual training schedule for the trainings that are required by their estate employees.</li> <li>○ Training manager compile annual training scheduled from each OU and create brief summary of the training needs of each OU for that year.</li> <li>○ Appointed assistant for each OU's will proceed with training activities on the annual training schedule and reported the training report to the training manager.</li> </ul> </li> <li>● Training Carried by STC (HRD-02-06)</li> <li>● Training curriculum (HRD-02-07)</li> <li>● Staff Benefit Education, Leave and House Allowance (HRD-03-01)</li> <li>● Payroll (HRD-03-02)</li> <li>● Staff Appraisal (HRD-03-03)</li> <li>● Pension Reserves (HRD-03-04)</li> <li>● Internal Grievance (HRD-04-01)</li> <li>● External Grievance (HRD-04-02)</li> <li>● Disciplinary Action (HRD-04-03)</li> <li>● Staff Resignation (HRD-04-04)</li> <li>● Staff Retirement (HRD-04-05)</li> </ul>	
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6.1.4	Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.	Based on public consultation with board of gender committee representatives and women worker in estates obtained information that the women worker has had a reproduction rights such as menstruation and maternity leaves. Pregnant and breastfeeding women worker cannot work with agro chemical such as pesticide and fertilizer. They will transferred into non-chemical station if identified as pregnant or breastfeeding.	Comply

6.1.5	<b>(C)</b> A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.	Based on public consultation with board of gender committee representatives and women worker in estates obtained information gender committee has socialized women worker rights. Boards of gender committee also conducted several program to socialize against sexual harassment, reproduction health, Integrated Healthcare Centre for babies etc.	Comply
6.1.6	There is evidence of equal pay for the same work scope.	Based on public consultation with board of labour union representatives obtained information that the company has implemented of payments according to the collective labour agreement which is always higher than minimum wage that stipulated by local government. There is no dispute against the payments. It also no record of payment that non complies with regulation in labour agencies of Labuhanbatu Selatan District. All worker has been paid according to the work position, including their overtime or incentives.	Comply
<b>Criteria 6.2</b> Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).			
6.2.1	<b>(C)</b> Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages and explained to them in language they understand.	Unit of certification are implementing collective working agreement or “Perjanjian Kerja Bersama” as industrial relationship. Document of its agreement is available in Bahasa Indonesia and documentation pay and conditions are available within. Tolan Estate: PT. Tolan Tiga Indonesia has shown the document of Collective Working Agreement (PKB) year 2018 – 2020 between PT. Tolan Tiga Indonesia and labour union (Pengurus Serikat Pekerja Tolan Tiga Mandiri) as reference in working regulation. Collective Worker Agreement was approved by Head of Manpower Agency of Labuhanbatu Regency, dated 2 November 2018. Individual contract agreement between company and each worker are available. Documentation of pay and conditions are available to the workers in Bahasa Indonesia. Sample of individual seasonal contract “Perjanjian Kerja Waktu Tertentu (PKWT)” Mr. A****D A****I (sprayer/herbicide operator), dated 2 Sep 2019. Sample of individual contract of casual worker (PHL), based on Working Agreement “Ketua Koperasi Jasa PT. Tolan Tiga” : No. 11/KJ-TLE/01/2020, dated 9 January 2020 (Mrs. S*****I), as representative of fruit collector Division 5.	Comply

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		Detail pay and condition is described in Article 5 or "Pasal 5".	
6.2.2	<b>(C)</b> Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed, including work done by family members.	Employment contracts and related documents detailing payments and conditions of employment has been clear described in Working Collaborative Agreement or "Perjanjian Kerja Bersama" between PT. Tolan Tiga Indonesia and Worker Union "Serikat Pekerja Tolan Tiga Mandiri". Based on interview with sample of workers, they informed that payment already met the Indonesia regulation and no harassment of worker rights.	Comply
6.2.3	<b>(C)</b> There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.	As per Indonesia legal labour requirements refer to Manpower Act No. 13 Year 2013, regular working hours divided into two types, i.e: 7 hours/day or 40 hours/week (6 working days) and 8 hours/day or 40 hours/week (5 working days). Unit of certification applied 6 working days, which is 7 hours/day. For overtime, unit of certification applying calculation as per Ministry of Manpower Decree "SK Menakertrans No: KEP-102/MEN/VI/2004", as below: (Nett income per month + price of primary food/rice per month) : 173 Daily working days: 1 <sup>st</sup> hour of overtime will paid 1.5 x wage per hour. Next hour of overtime will be paid 2 time per hour. Working on holiday (6 working days): First of 7 hours will be paid twice. Hour 8 will be paid 3 times; Hour 9 to 10 will be paid 4 times. Evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements, already stated clearly within Collaborative Working Agreements or "Perjanjian Kerja Bersama" period 2018-2020.	Comply
6.2.4	<b>(C)</b> The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public	Unit of Certification have provided adequate facilities for their workers. According to database from sample of unit which verified, as follow: List of General facility in Perlarian POM updated in February 2020, such as: <ul style="list-style-type: none"> <li>• Labour Housing (56 units),</li> </ul>	Comply

	<p>facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.</p>	<ul style="list-style-type: none"> <li>• Water tank (1 unit),</li> <li>• Sports facilities (badminton court and volley ball court),</li> <li>• Electricity and</li> <li>• Clean water.</li> </ul> <p>Perlabian Estate,  List of general facility dated 10 February 2020, such as:</p> <ul style="list-style-type: none"> <li>• Housing G-2 (378 units),</li> <li>• Polyclinic (1 unit),</li> <li>• Ambulance (1 unit),</li> <li>• Mosque (4 unit),</li> <li>• Church (1 unit),</li> <li>• Employee hall (3 unit),</li> <li>• Sports facilities (volley ball, field tennis, football, badminton)</li> <li>• Kindergarten (5 unit),</li> <li>• School bus (2 unit),</li> <li>• Electricity by PLN</li> </ul> <p>Based on field visit at housing complex at Perlabian Estate and Tolan Estate, those facilities is well maintained and adequate.</p> <p>PT Tolan Tiga Indonesia monitors quality of clean water wells in employee housing. Water quality analysis are done by KAN accredited laboratory, PT Mutu Agung Lestari according to The Water Quality Standards stipulated on Minister of Health Regulation No.32/2017. Sample verified: certificate number 4037/MDN/X/19, for water quality analysis dated 7<sup>th</sup> November 2019.</p>	
6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p>	<p>Unit of Certification located along provincial road, where distance from labour housing complex to Rantau Prapat township only 1 hour. Therefore, to obtain affordable food and adequate drink water is close. Unit of certification also provide adequate water in Estate and Mill to washing and bathing.</p>	Comply
6.2.6	<p>A DLW is paid to all workers, including</p>	<p>Unit of Certification has prepared the prevailing wage calculation. The company referred</p>	Comply

	<p>those on piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p>	<p>to RSPO Guidance for Implementing Decent Living Wage. Company have taken into calculation the component:</p> <ul style="list-style-type: none"> <li>• Reference family size (incl. Total Fertility Rate/TFR and Child Mortality Rate/CMR – Indonesia year 2019);</li> <li>• Full time equivalent per Family (incl. Labor Force Participation Rate/LFPR, Unemployment rate, People Working Part Time – Indonesia year 2019);</li> <li>• Food cost (with 2,100 calories, footnote 19 RSPO Guidance on Implementing DLW) and noted company provided in kind benefit, rice;</li> <li>• Housing cost (provided by company);</li> <li>• Non Food Non Housing cost (electricity, clean water, medical treatment, education, school children transportation cost – provided by company);</li> <li>• Mandatory deduction (from tax and BPJS levy);</li> </ul> <p>Sample of DLW calculation at Tolan Estate, as follow: Minimum Wage of Labuhanbatu Selatan Regency in 2019 is IDR 3,300,000. Gross Living Wage at IDR.4,031,952; Prevailing wage at IDR. 4,719,427; Living Wage Gap at IDR.687,475 (positive);</p> <p>Perlabian POM: Minimum Wage of Labuhanbatu Regency in 2019 is IDR 2,964,778. Gross Living Wage at IDR.3,938,754; Prevailing wage at IDR. 4,347,740; Living Wage Gap at IDR.408,986 (positive);</p> <p>Perlabian Estate: Minimum Wage of Labuhanbatu Regency in 2019 is IDR 2,984,667. Gross Living Wage at IDR.4,068,000; Prevailing wage at IDR. 4,465,667; Living Wage Gap at IDR.397,667 (positive);</p>	
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<b>PROCEDURAL NOTE:</b>			
The RSPO Labour Task Force will prepare guidance on the DLW implementation, including details on how to calculate a DLW, expected for 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist.			
6.2.7	Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.	Workers status in Unit of Certification consist of permanent workers (SKU-B or SKU-H), seasonal contracted workers (PKWT) and casual workers (BHL). Total workers: 467 workers, consist of Permanent (392 workers) and Seasonal or "PKWT" (75 workers). Memorandum from Human Resource Department No: 230/JWB-RMONS/IX/2019, dated 30 September 2019. Memorandum related approval of workers promotion and grade level promotion at Perlavian Estate. Details of Memo is one (1) PKWT worker promoted became permanent workers (SKU-H). Based on interview with representative of Worker Union, it was informed clearly that certificate holder employed permanent workers for all core work performed, such as Harvester, FFB Loader, Manuring and several Pesticide applicator. There is only two type of worker status at the company, Permanent workers (daily or monthly basis) and contracted workers (PKWT).	Comply
<b>Criteria 6.3</b>			
The unit of certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.			
6.3.1	<b>(C)</b> A published statement recognising freedom of association and right to collective bargaining in national languages is available and is explained to all workers in languages that they understand, and is demonstrably implemented.	The unit of certification has a policy related to freedom of association set in Policy No. QMM-40-01-P13 (Freedom of Association Policy) dated 1 March 2014. The policy stated that "the company recognizes the role of lawful and independent workers and employees representative organizations in creating a constructive working environment". Unit of Certification implement one type of union, Independent Labour/Worker Union (Serikat Pekerja Mandiri). Based on information gathered during stakeholder consultation with Manpower Agency of Labuhanbatu Selatan Regency, it was informed that both union (Labour union and Bipartite organisation) has been officially registered.	Comply
6.3.2	Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are	Last meeting of LKS Bipartit conducted on 20 February 2020 and attended by 12 persons. Topic to be discussed during the meeting are : • Sport facilities	Comply

	documented in national languages and made available upon request.	<ul style="list-style-type: none"> <li>• Motorcycle parking court</li> <li>• Domestic waste disposal</li> <li>• Minimizing of water usage</li> </ul>	
6.3.3	Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.	Based on interview with representative of Worker Union (Serikat Pekerja Tolan Tiga Mandiri) at Perlabian Estate, membership of worker union is optional and freely chosen. However, all permanent workers at Perlabian Estate already registered to Union. If contracted workers or "PKWT" have an issue related employment, union can also receive and facilitate the issues with the company.	Comply
<b>Criteria 6.4:</b>			
Children are not employed or exploited.			
6.4.1	A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.	Unit of certification has a policy on the Prohibition of Child Labor as outlined in the company's "Child Labor Policy" dated 27 March 2019. The policy stated "PT. Tolan Tiga Indonesia is committed not to employ children under 18 years of age, and anything related to work, supports the laws of the Republic of Indonesia and other agreements including the 1999 ILO Child Labor Convention".	Comply
6.4.2	<b>(C)</b> There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.	Based on verification of job vacancy announcement documents as well as job application requirements data, it shows that each applicant file must attach a copy of National Identity Card (KTP) to verify data of age and citizenship status. Sample of List Workers Database at Perlabian POM, period February 2020 as follow: <ul style="list-style-type: none"> <li>• Mr. I*** S***** (Cleaning Gang). Born: 13 Dec 1997, Join to work: 1 Aug 2018 (age 21 y.o). Current age: 23 y.o.</li> <li>• Mr. F**** A***** (Capstand Loading Ramp). Born: 19 Mar 1996, Join to work: 1 Aug 2018 (age 22 y.o). Current age: 24 y.o.</li> </ul>	Comply
6.4.3	<b>(C)</b> Young persons may be employed only for non-hazardous work, with protective restrictions in place for that work.	As outlined in indicator 6.4.1, The unit of certification has a policy on the Prohibition of Child Labor as outlined in the company's "Child Labor Policy" dated 27 March 2019. The policy stated that "PT. Tolan Tiga Indonesia is committed not to employ children under 18 years of age, and anything related to work, supports the laws of the Republic of Indonesia and other agreements including the 1999 ILO Child Labor Convention".  Sample of List Workers Database at	Comply

		<p>Perlabian POM, period February 2020 as follow:</p> <ul style="list-style-type: none"> <li>Mr. I*** S***** (Cleaning Gang). Born: 13 Dec 1997, Join to work: 1 Aug 2018 (age 21 y.o). Current age: 23 y.o.</li> <li>Mr. F**** A***** (Capstand Loading Ramp). Born: 19 Mar 1996, Join to work: 1 Aug 2018 (age 22 y.o). Current age: 24 y.o.</li> </ul> <p>Based on verification of worker documents for period December 2019 in each unit (Estate and Mill), there are no workers who are less than 18 year old when hired as workers or worked at hazardous area.</p>	
6.4.4	<p>The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.</p>	<p>Based on interviews with Perlabian village Head, workers union officials, local NGO's and workers in field, showed that they have understood company policies to prohibit the use of child labour in all types of company operational activities.</p> <p>Based on document verification, shows that the unit of certification has disseminated the policy prohibiting the use of child labor through:</p> <ul style="list-style-type: none"> <li>Post the policy on the bulletin board in each estate/mill office</li> <li>Conducting verbal dissemination to workers, especially types of work which are vulnerable to use "informal workers" such as in the harvesting.</li> <li>Include a clause of prohibiting the use of child labor in each contract document with the contractor.</li> </ul>	Comply
<p><b>Criteria 6.5:</b> There is no harassment or abuse in the workplace, and reproductive rights are protected.</p>			
6.5.1	<p><b>(C)</b> A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.</p>	<p>Unit of certification has a policy on prevention of sexual harassment/ violence as outlined in policy No. QMM-40-01-P10, Rev 1 (Sexual Harassment Policy) dated 27 March 2019. Based on interview with sample of female workers and Gender Committee representative, it is clearly that they have understood the company's policies on prevention of sexual harassment.</p>	Comply
6.5.2	<p><b>(C)</b> A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.</p>	<p>The unit of certification has a policy on protection of reproductive rights as outlined in policy No. QMM-40-01-P11, Rev 1 (Protection of Reproductive Rights Policy) dated 27 March 2019. Based on interview with sample of female workers and Gender Committee representative, it is clearly that company are respectful on protection of reproductive rights. In example, female workers who has children are given to breastfeeding time for 30-45 minutes every</p>	Comply



		day.	
6.5.3	Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.	Based on interview with sample of female workers and Gender Committee representative, it is clearly that company are respectful on protection of reproductive rights. In example, female workers who has children are given to breastfeeding time for 30-45 minutes every day.	Comply
6.5.4	A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.	Based on direct interview with sample of female workers and Gender Committee, they already understood how the company procedures to resolving disputes, grievance and complaints. Anonymity and complainants are protected as requested by them.	Comply
<b>Criteria 6.6:</b> No forms of forced or trafficked labour are used.			
6.6.1	<p><b>C)</b> All work is voluntary and following are prohibited:</p> <ul style="list-style-type: none"> <li>• Retention of identity documents or passports</li> <li>• Payment of recruitment fees</li> <li>• Contract substitution</li> <li>• Involuntary overtime</li> <li>• Lack of freedom of workers to resign</li> <li>• Penalty for termination of employment</li> <li>• Debt bondage</li> <li>• Withholding of wages</li> </ul>	<p>Based on interview with workers and workers union, stated that the unit of certification does not practiced such thing as follows:</p> <ul style="list-style-type: none"> <li>• Retention of identity documents or passports</li> <li>• Payment of recruitment fees</li> <li>• Contract substitution</li> <li>• Involuntary overtime</li> <li>• Lack of freedom of workers to resign</li> <li>• Penalty for termination of employment</li> <li>• Debt bondage</li> <li>• Withholding of wages</li> </ul>	Comply
6.6.2	<b>(C)</b> Where temporary or migrant workers are employed, a specific labour policy and procedures are established and implemented.	Based on direct interview with workers and representative of labour union, it is informed that unit of certification are employed local workers, resident of surrounding villages (Pekan Tolan villagers, Meranti villagers and Tanjung Medan villagers) and Indonesian citizen from other regencies or provincial. There is no migrant workers and only two type of working status, permanent (SKU-H/B) and contracted workers (PKWT)	Comply
<b>Criteria 6.7:</b> The unit of certification ensures that the working environment under its control is safe and without undue risk to health.			
6.7.1	<b>(C)</b> The responsible person(s) for H&S is identified. There are records of regular meetings	OHS Committee was registered as per Surat Keputusan Kepala Dinas Ketenagakerjaan Kabupaten Labuhanbatu Selatan Nomor: KEP.15/P2K3/Naker/2019 tentang Pengesahan	Comply

	<p>between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p>	<p>Panitia Pembinaan Keselamatan dan Kesehatan Kerja (P2K3) di Perusahaan, dated 2<sup>nd</sup> October 2019.          Head of OHS committee: Mr Sariman Sihombing          Secretary: Sugianto, ST</p> <p>Data verified:</p> <ul style="list-style-type: none"> <li>• OHS Expert namely Mr Sugianto, ST, license number Reg.5017/PK3/AJ/12/2017/P1 - valid until 20<sup>th</sup> September 2020.</li> <li>• Minute of OHS meeting (monthly), last meeting conducted on 20<sup>th</sup> February 2020. Agenda: review on progress action from previous OHS meeting, review of OHS inspection report and accidents.</li> <li>• Report of OHS performance for period October - December 2019 was sent to Manpower Agency in Labuhanbatu Selatan Regency, dated 12<sup>th</sup> March 2020.</li> </ul>	
<p>6.7.2</p>	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in the appropriate language of the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p>	<p>PT Tolan Tiga Indonesia has established the procedure of accident response under "Prosedur Keselamatan dan Kesehatan Kerja (K3), No.SOP/TDI/05" dated 1 July 2017. The procedure of emergency situation, e.g:</p> <ul style="list-style-type: none"> <li>• Emergency procedure for hazardous waste, "SOP Tanggap Darurat Limbah B3 No.SOP/TDI/01", dated 1 July 2017.</li> <li>• Emergency procedure for pesticide spillage "WI Penganganan Tumpahan Pestisida dan Herbisida No.GMO-NS/ENC/WI/K3/04", dated 1 April 2014</li> <li>• Emergency procedure for fertilizer spillage "WI Penanganan Tumpukan Pupuk No.GMO-NS/ENC/K3/03", dated 1 April 2014</li> <li>• Emergency procedure for fuel, oil and lubricant spillage "WI Penanganan Tumpahan Bahan Bakar Minyak, Oil dan Pelumas No.GMO-NS/ENC/WI/K3/05", dated 1 April 2014.</li> </ul> <p>Data verified:</p> <ul style="list-style-type: none"> <li>• Fire drill dated 27<sup>th</sup> January 2020, location in Perlabian POM. Date verified: attendance list, photograph, scenario, evaluation of fire drill.</li> <li>• Training for first aider, dated 27<sup>th</sup> January 2020, trainer: paramedical, was attended by 98 workers.</li> </ul>	<p>Comply</p>

		<ul style="list-style-type: none"> <li>Monitoring of First Aid Kit (including portable kit) as per "Daftar Pemegang Kotak P3K Portable" updated in January 2020 – there was 14 first aid kit. During the RAV – March 2020 the auditor was inspected in mixing area, the first aid kit condition in OK to comply with regulation.</li> <li>Monitoring of First Aid Kit (including portable kit) as per "Daftar Pemegang Kotak P3K Portable" updated in January 2020. The auditor was inspected in mixing area, the first aid kit condition in OK to comply with regulation.</li> </ul>	
6.7.3	<p><b>(C)</b> Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p>	<p>PT Tolan Tiga Indonesia has shown the document of workers in appropriate PPE.            Data verified:</p> <ul style="list-style-type: none"> <li>Monitoring of OHS equipment, e.g: 6<sup>th</sup> January 2020, 5<sup>th</sup> February 2020 for fire extinguisher in Perlabian Office (registration number: 012); reported OK</li> <li>Fire drill dated 27<sup>th</sup> January 2020, location in Perlabian POM. Date verified: attendance list, photograph, scenario, evaluation of fire drill.</li> <li>Training for first aider, dated 27<sup>th</sup> January 2020, trainer: paramedical, was attended by 98 workers.</li> <li>Monitoring of first aider in Mill laboratory on 2<sup>nd</sup> March 2020, result OK</li> <li>Monitoring of fire hydrant (monthly), dated 2<sup>nd</sup> March 2020, result OK</li> <li>Refresh training/socialization on using of PPE dated 4<sup>th</sup> March 2020 for processing workers in Perlabian POM.</li> <li>Special Medical Check-up for worker in high risk area in Perlabian POM (annually), last MCU on 2<sup>nd</sup> October 2019 – was attended by 42 workers, conducted by Klinik Anugerah Ibu. Data verified: Report of MCU and attendance list on socialization the MCU result for all workers (dated 4<sup>th</sup> March 2020).</li> <li>Record of OHS inspection for third party (construction contractor – CV Mutu Pratama) as per "Pemeriksaan Kinerja Kontraktor Sehubungan dengan K3 dan Lingkungan", dated 13<sup>th</sup> March 2020 – reported OK for using of PPE.</li> <li>Record on Safety Briefing for contractor or visitor in Pelabian POM, e.g; 19<sup>th</sup> March 2019, contractor name CV Mutu Pratama.</li> <li>Minute of OHS meeting (monthly), last meeting conducted on 20<sup>th</sup> February 2020. Agenda: review on progress action from previous OHS meeting, review of OHS inspection report and accidents.</li> </ul>	Comply

- Report of OHS performance for period October - December 2019 was sent to Manpower Agency in Labuhanbatu Selatan Regency, dated 12<sup>th</sup> March 2020.
- Report of machinery inspection by Manpower Agency in North Sumatera, e.g:
  - Certificate of machinery inspection for steam vessel "bejana uap", register No.678/48.03/2006, last inspection on 20 February 2017 – valid until 2021.
  - Certificate of machinery inspection forliftand carry machine "pesawat angkat dan angkut", register No.377/PAA/W2/1992, last inspection on 7 July 2019 (annually)
  - Certificate of machinery inspection for "instalasi penyalur petir", register No. 01/W2/PPT/NR/1993, last inspection on 7 July 2019. Result 1.2 ohm;
  - License of OHS overhead crane operator under name Mr. Santano Adha, register No. 1560634-OPK3-LT/PAA/VIII/2019, valid until 16<sup>th</sup> August 2024
  - License of OHS boiler operator 2nd grade under name Mr. Sukerno, register No. P.14.6157.OPK3-PUBT.II/II/2020, valid 3<sup>rd</sup> February 2020.
  - License of OHS boiler operator 1st grade under name Mr M Syahrudin Nur, register No.10095.OPK3-PUBT-B.I/IX/2016, dated 23 September 2016 – valid until 23<sup>rd</sup> September 2021.

List of emergency responses and preparedness equipment, updated in February 2020.

No	Equipment	Quantity
1	Helmet	30 pcs
2	Lamp	30 pcs
3	Safety goggles	30 pcs
4	Mask	30 pcs
5	Safety gloves	30 pcs
6	Safety belt/safety harness	30 pcs
7	AP booth for fire response	30 pcs
8	Apron	30 pcs
9	First aid kit	4 pcs
10	Tower for fire monitoring	2 units
11	Water pump capacity 25HP (Shibaura)	2 pcs
12	Water pump capacity 5HP (Robin)	4 pcs

		<table border="1"> <tr><td>13</td><td>Hose power (8 meters)</td><td>2 pcs</td></tr> <tr><td>14</td><td>Hose power (20 meters)</td><td>28 pcs</td></tr> <tr><td>15</td><td>Nozzle</td><td>4 pcs</td></tr> <tr><td>16</td><td>Water tank</td><td>3 pcs</td></tr> <tr><td>17</td><td>Y connector</td><td>2 pcs</td></tr> <tr><td>18</td><td>GPS</td><td>4 pcs</td></tr> <tr><td>19</td><td>Hand talky</td><td>4 pcs</td></tr> <tr><td>20</td><td>Megaphone</td><td>8 pcs</td></tr> <tr><td>21</td><td>Binoculars</td><td>1 pcs</td></tr> <tr><td>22</td><td>Unit for transportation</td><td>1 unit truck</td></tr> <tr><td>23</td><td>Unit for patrol</td><td>1 unit</td></tr> </table>	13	Hose power (8 meters)	2 pcs	14	Hose power (20 meters)	28 pcs	15	Nozzle	4 pcs	16	Water tank	3 pcs	17	Y connector	2 pcs	18	GPS	4 pcs	19	Hand talky	4 pcs	20	Megaphone	8 pcs	21	Binoculars	1 pcs	22	Unit for transportation	1 unit truck	23	Unit for patrol	1 unit	
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6.7.4	All workers are provided with medical care and covered by accident insurance. Costs incurred from work-related incidents leading to injury or sickness are covered in accordance with national law or by the unit of certification where national law does not offer protection.	<p>PT Tolan Tiga Indonesia have registered all workers into BPJS Ketenagakerjaan and BPJS Kesehatan. All workers have been provided with medical check up. Accident insurance for permanent workers and Contract worker covered by BPJS.</p> <p>All workers have been registered with insurance and medical care.</p> <p>Evidence:</p> <ul style="list-style-type: none"> <li>• Perlabian POM - Bill payment of BPJS Ketenagakerjaan month February 2020 reference: 332001004389, total payment IDR X8,371,582 dated 10 February 2020, covering for 98 workers.</li> <li>• Pelabian POM - Bill payment of BPJS Kesehatan month February 2020, total payment IDR X4,218,326, status paid on 5<sup>th</sup> March 2020</li> </ul>	Comply																																	
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	<p>Record of injuries was shown under "Daftar Kecelakaan Kerja year 2019". Since year 2019 there was 2 accidents reported, with LTA is 3 mandays.</p> <p>Data verified:</p> <ul style="list-style-type: none"> <li>• "Formulir Pelaporan Kecelakaan Kerja PT Tolan Tiga Indonesia, namely Ahmad Sabran</li> </ul>	Comply																																	

		<p>(operator in boiler station - dated 17<sup>th</sup> February 2019).</p> <ul style="list-style-type: none"> <li>Investigation Report dated 17<sup>th</sup> February 2019, namely Mr Ahmad Sabran (operator in boiler station), OHS expert: Dita Zakaria. All of recommendation has been followed up. Evidences seen: Attendance list on training of boiler operation, photograph and correction record.</li> </ul>	
<p><b>Principle 7:</b> Protect the environment, conserve biodiversity and ensure sustainable management of natural resources.</p>			
<p><b>Criteria 7.1:</b> Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.</p>			
7.1.1	<p><b>(C)</b> IPM plans are implemented and monitored to ensure effective pest control.</p>	<p>Integrated Pest Management plan in Perlabian Estate is evident, as titled "Program Pengendalian Hama Terpadu 2020", established 2 January 2020. Program consist of monitoring of barn-owl box; Planting Turnera; Upkeep Turnera; census of leaf-eater caterpillar; identification of beneficial weeds and ganoderma census.</p> <p>Realization of IPM verified in document upkeep of beneficial plant verified as in document "Oil Palm, <i>Mucuna bracteata</i> and Beneficial Plant Nursery Report" dated 2 Mar 2020; it was observed that there is 4,300 bag of <i>Turnera subulatta</i>, 640 bags of <i>Antigonon leptopus</i> and 1,262 bags of <i>Casia cobanensis</i>. Based on "Pest &amp; Disease Control of Bagworm and Nettle Caterpillar" period February 2020, bagworm and nettle caterpillar attack level was light.</p> <p>Integrated Pest Management plan in Tolan Estate is evident, as titled "Program Pengendalian Hama Terpadu 2020", established 2 January 2020. Program consist of monitoring of barn-owl box; Planting Turnera; Upkeep Turnera; census of leaf-eater caterpillar; identification of beneficial weeds and ganoderma census.</p> <p>Realization of IPM verified in document e.g. "Pest &amp; Disease Control of Bagworm – Nettle Caterpillar"; monitoring on barn owl box on monthly basis; planting of beneficial plant (<i>Turnera subulata</i> and <i>Cassia</i> sp); pest detection and pest and disease census on monthly basis.</p>	Comply

		<p>Chemical control are done using Starthene by Trunk Injection method. Trunk Injection only done if the attack level is Medium or Heavy. Medical check-up performed to all Trunk Injection operator in 3-month intervals. Appropriate PPE are used during Trunk Injection.</p> <p>Biological control performed by planting and upkeep beneficial plant. During field visit, it was observed <i>Turnera subulatta</i> planted in most of the collection road or transport road. The unit of certification also carried out breeding of nettle caterpillar natural enemy, <i>Sycanus creovitattus</i>. The person in charge can explained very well regarding the breeding process and growth from eggs to instar 5. Rat are naturally control by barn owl. Monitoring of barn owl are available during audit.</p>																									
7.1.2	Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.	The unit of certification has a list of Global Invasive Species, and evaluate the status of existence in certified area. Some species are naturally exist in the area and the spreading are controlled manually, e.g. <i>Achatina fulica</i> , <i>Ageratum conizoides</i> , <i>Clidemia hirta</i> , <i>Imperata cylindica</i> , <i>Lantana camara</i> , <i>Mikania micranta</i> and <i>Mimosa pudica</i> . The are no species in the list that used to managed areas in unit of certification.	Comply																								
7.1.3	There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities. [For NI to define process]	Based on field visit and document review, there is no use of fire for pest control in whole area of Perlavian Estate and Tolan Estate.	Comply																								
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Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.																											
7.2.1	(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.	<p>The company has recorded list of herbicide used, completed with active ingredient, WHO class, trademark, target, registration number and expiry date.</p> <table border="1"> <thead> <tr> <th>Trademark</th> <th>Active Ingredient</th> <th>WHO Class</th> <th>Target</th> <th>Registration Number</th> <th>Expiry date</th> </tr> </thead> <tbody> <tr> <td>Smart 486 AS</td> <td>Isopropil amina glifosat 486 g/l</td> <td>U</td> <td>Grasses weed</td> <td>RI.01030119971313</td> <td>12/11/2023</td> </tr> <tr> <td>Basta 150 SL</td> <td>Amonium glufosinat 150 g/l</td> <td>III</td> <td>Grass weed, broad leaf</td> <td>RI.01030119921113</td> <td>12/11/2023</td> </tr> <tr> <td>Becano 500 SL</td> <td>indaziflam</td> <td>III</td> <td>Brush weed/wood</td> <td>RI.01030120124279</td> <td>02/05/2022</td> </tr> </tbody> </table>	Trademark	Active Ingredient	WHO Class	Target	Registration Number	Expiry date	Smart 486 AS	Isopropil amina glifosat 486 g/l	U	Grasses weed	RI.01030119971313	12/11/2023	Basta 150 SL	Amonium glufosinat 150 g/l	III	Grass weed, broad leaf	RI.01030119921113	12/11/2023	Becano 500 SL	indaziflam	III	Brush weed/wood	RI.01030120124279	02/05/2022	Comply
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7.2.2	(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.	Document "Rekapitulasi Penggunaan Pestisida Tahun 2019" recorded pesticides use including active ingredients, LD50, area treated, amount of active ingredients applied per Ha and per ton FFB.	Comply																																																																		



		Pesticide use in Perlavian Estate in 2019:				
		Trademark	Volume (L or kg)	Area applied (Ha)	a.i. (kg-L/Ha)	
		Basta 150 SL	1,071.56	1,861.29	0.035454	
		Becano 500 EC	7.50	29.72	0.000827	
		Garlon 670 EC	221.13	1,105.98	0.032680	
		Satarane 290 EC	166.55	3,050.82	0.010653	
		Agristick	213.24	13,934.09	-	
		Decis 25 EC	16.90	4.46	0.000093	
		Marathon 500 WSC	21.91	622.37	0.002416	
		Starthene 75 WG	86.55	1,318.01	0.014318	
		Regent 50 EC	1.45	4.46	0.000015	
		Marshall 5 GR	6,160.93	8,227.55	0.067948	
		Metsulindo WP	166.24	15,138.12	0.007333	
		Smart 486 AS	5,768.45	15,296.56	0.618382	
		Thuricide HP	294.27	1,272.35	0.084382	
		Tikumin	881.45	544.33	0.000007	
7.2.3	(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.	Use of pesticide are minimized as part of the plan, and in accordance with IPM Plans, there are no pesticide application outside of the targeted species and planned intervals. Pesticide are only use to reduce / eliminate existing pest, which has exceeded the economic threshold.				Comply
7.2.4	There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best	There is no use of prophylactic use of pesticides throughout Perlavian Estate and Tolan Estate. Pesticide are only use to reduce / eliminate existing pest, which has exceeded the economic threshold.				Comply

7.2.5	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to: 7.2.5a Judgment of the threat and verify why this is a major threat</p>	<p>There is no use of WHO Class 1A or 1B pesticide in whole plantation operation. The use of paraquat has been stopped since 2017. The company's General Manager of North Sumatera has issued Memorandum No.117/GMO-All Estate/XI/2016, dated 1 December 2015. The memorandum stated that the use of paraquat as contact pesticide is not allowed as of 1 January 2017. Target: Zero use of paraquat effective since 1 January 2017.</p> <p>Based on visit in field operation and agrochemical storage in Perlabian Estate and Tolan Estate., there was no paraquat found. Based on report of "Daftar Pestisida yang digunakan di Tahun 2019" as well as 2020 – there was no paraquat noted in the report.</p> <p>There are no use of pesticide that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, or paraquat in whole operation of unit of certification.</p>	Comply
7.2.5b	Why there is no other alternative which can be used	There are no use of pesticide that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, or paraquat in whole operation of unit of certification.	
7.2.5c	Which process was applied to verify why there is no other less hazardous alternative	There are no use of pesticide that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, or paraquat in whole operation of unit of certification.	
7.2.5d	What is the process to limit the negative impacts of the application	There are no use of pesticide that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, or paraquat in whole operation of unit of certification.	
7.2.5e	Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.	There are no use of pesticide that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, or paraquat in whole operation of unit of certification.	
7.2.6	<b>(C)</b> Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6).	<p>Tolan Estate and Perlabian Estate have provided basic training related to pesticide, understanding material safety data sheet/MSDS, limited pesticide training, emergency condition training and first aid training.</p> <p>Standard PPE for sprayer: goggle, masker, apron, rubber glove, rubber boot. Standard PPE for chemical mixer/chemical storekeeper: faceshield, masker, apron, rubber glove,</p>	Comply

	<p>Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p>	<p>safety boot.</p> <p>Record of training for person who handling pesticides, such as:</p> <ul style="list-style-type: none"> <li>• Attendance list of "Pelatihan Kaliberasi Sprayer dan Perawatan Alat kerja" dated 23<sup>th</sup> January 2020.</li> <li>• Attendance list of "Training Pencampuran Pestisida", dated 6<sup>th</sup> March 2020, location in Go-Down, was attended by 7 workers.</li> <li>• Training of Pesticide use and handling on 13 Feb 2020</li> </ul>	
<p>7.2.7</p>	<p><b>(C)</b> Storage of all pesticides is in accordance with recognised best practices.</p>	<p>The storage is equipped with sufficient air ventilation to provide air circulation. Hazard signs, emergency shower, secondary containment, spill kit, appropriate PPE (face shield, permeable gloves, apron and mask) is available and ready for use.</p> <p>Working instruction for pre-mixing, stacking and storing pesticide is current, MSDS is also readily available. Material Data Safety Sheets (MSDS) are obtained for all chemicals used and are available at the areas of mixing. These were all seen be controlled by date and were readily available. No concentrates are taken into the field as all spray solutions are pre- mixed in a designated area.</p> <p>Empty pesticide container was triple rinsed before sent for temporary hazardous waste storage.</p> <p>PT Tolan Tiga Indonesia supplies two sets of overalls to all pesticide operators so that one can always be considered clean. Overalls are washed at the pesticide mixing areas in specially constructed wash areas so that sprayers and mixers do not need to take them home and therefore the risk of cross contamination with family members is reduced and eliminated.</p>	<p>Comply</p>
<p>7.2.8</p>	<p>All pesticide containers are properly disposed of and/or handled responsibly if used for other purposes.</p>	<p>All chemical and hazardous waste are stored in temporary hazardous waste storage.</p> <p>PT. Tolan Tiga Indonesia has shown the the record of disposal of hazardous waste to third party licensed waste collector (PT. Amindy Barokah) on 3 months base. The Manifest documents and receipts were available and properly recorded, Procedure on Management of Hazardous Waste Materials nomor: 01-10/02-10-2017 revision 0 dated 2 November</p>	<p>Comply</p>

		<p>2017. The procedure was regulated to ensure a proper system for handling and storage of hazardous waste and toxic waste (LB3) to mitigate the risks of the danger and pollution that can be generated.</p> <p>Auditor visited the storage (TPS Limbah B3) in Perlavian Estate there was verified and found the appropriate storage has been provided with consideration of safety and environmental aspects such as second containment, spill-kit, warning signs, PPE, fire extinguisher, alarm and first-aid kit.</p>	
7.2.9	<p><b>(C)</b> Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.</p>	<p>There is no aerial application of pesticide in whole operation area of Perlavian Estate and Tolan Estate.</p>	Comply
7.2.10	<p><b>(C)</b> Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p>	<p>PT Tolan Tiga Indonesia was regularly conducted the special medical check-up for pesticides operators. Data verified:</p> <ul style="list-style-type: none"> <li>Annually - Report of special medical check-up in September 2019, conducted by accreditation laboratory (Klinik Spesialis Anugerah Ibu Medan), was attended by worker of spraying applicator, chemical storage keepers, supervisor for chemical applicator, manuring applicator.</li> <li>Per 3 months – Special medical check-up was conducted by paramedical for workers in high risk area, last MCU in December 2019</li> </ul>	Comply
7.2.11	<p><b>(C)</b> No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.</p>	<p>PT Tolan Tiga Indonesia was prepared the procedure on Using and Storing Agrochemicals No: OPM-09-03/22-03/2019/Revision.4, dated 27<sup>th</sup> March 2019, in point 5.6 mentioned “make sure workers who use pesticides area healthy and not pregnant or breastfeeding.”</p> <p>Data verified:</p> <ul style="list-style-type: none"> <li>Monitoring of spraying team no pregnant and breastfeeding (monthly), last monitoring month January and February 2020. Data seen: Daftar Absensi Tenaga</li> </ul>	Comply

		<p>Kerja Wanita Tidak Hamil dan Menyusui di Tolan Estate”</p> <ul style="list-style-type: none"> <li>Based on list of workers in high risk area month February 2020, there was no workers under the age of 18, the youngest workers is a Mr Syawal Pranoto (age: 25 years old)</li> </ul>	
<p><b>Criteria 7.3:</b>  Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.</p>			
7.3.1	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p>	<p>PT Tolan Tiga Indonesia was prepared the document of waste management plan, updated on 14<sup>th</sup> February 2020.</p> <p>PT. Tolan Tiga Indonesia has laso maintained a document of idenfitation source of all waste and pollution as in “Rencana Pengelolaan Limbah PT Tolan Tiga Indonesia”, last review on January 2020, such as:</p> <ul style="list-style-type: none"> <li>“Limbah padat dan limbah tajam poliklinik” – solid waste and sharp waste from clinic;</li> <li>“Limbah cair rumah tangga” - black water and grey water from domestic disposal;</li> <li>“Limbah padat rumah tangga” - organic and anorganic waste from domestic disposal;</li> <li>“Limbah bahan berbahaya beracun” – hazardous waste from power generator and vehicle such as waste lubricants, old battery and waste oil filter;</li> <li>“Kemasan bekas bahan kimia ukuran kecil dan kemasan jerigen bekas bahan kimia” – empty chemical container/jerry can;</li> <li>“Karung bekas pupuk” – empty fertilizer inner bag;</li> <li>“Wadah toner photocopy, cartridge printer” – photocopy machine toner and printer cartridges.</li> </ul>	Comply
7.3.2	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p>	<p>All chemical and hazardous waste from Perlabian POM and Perlabian Estate are stored in temporary hazardous waste storage in Perlabian Estate and the chemical and hazardous water from Tolan Estate is stored in temporary hazardous waste storage. The storage permit, such as:</p> <ul style="list-style-type: none"> <li>“Keputusan Kepala Badan Pelayanan Perizinan Terpadu dan Penanaman Modal Kabupaten Labuhanbatu Selatan No.503/318/BPPTPMLS/ P.I/2015 tentang Perpanjangan Izin Penyimpanan Sementara Limbah Bahan Berbahaya dan Beracun PT. Tolan Tiga Indonesia Kebun Tolan” dated 22 June 2015, location in Tolan Estate.</li> <li>“Keputusan Kepala Badan Pelayanan Perizinan Terpadu dan Penanaman Modal Kabupaten Labuhanbatu Selatan No.503/319/BPPTPMLS/P.I/2015 tentang Perpanjangan Izin Penyimpanan Sementara Limbah Bahan Berbahaya dan Beracun</li> </ul>	Comply

		<p>PT. Tolan Tiga Indonesia Kebun/PKS Perlabian” dated 22 June 2015 Location in Pelabian Estate.</p> <ul style="list-style-type: none"> <li>• “Surat Perjanjian Kerjasama No 232/TTI-ABS/SPKLB3/ III/2018” on agrrement of handing on hazardous waste,</li> </ul>	
7.3.3	The unit of certification does not use open fire for waste disposal.	PT Tolan Tiga Indonesia has prepared the procedure of waste disposal as per procedure of use, store and discharge pesticide no OPM-09-03/02-10-2017/Rev.2, in point 5.7 was mentioned Ex-pesticides container is not allowed to be thrown away, burned or buried in the soil.	Comply
<p><b>Criteria 7.4:</b>  Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.</p>			
7.4.1	Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.	<p>The unit of certification has numbers of procedure for good agriculture practices to maintain soil fertility and minimize environmental impact, as available under SOP:</p> <ul style="list-style-type: none"> <li>• OPM-06-01; Inorganic Fertiliser – Pupuk Inorganik.</li> <li>• OPM-06-02; Organic Fertiliser – Pupuk Organik</li> <li>• OPM-06-03; LSU: Palm Marking – LSU: Penandaan Tanaman.</li> <li>• OPM-06-04; Leaf Sampling Unit (LSU) and Rachis Sampling Unit (RSU) – Pengambilan Sampel.</li> </ul> <p>Fertilizer are applied to maintain and increase soil fertility, fertilizer applied following the fertilizer recommendation which established based on soil and leaf analysis as seen on “Oil Palm Fertilizer Recommendation for PT Tolan Tiga Indonesia – Perlabian Estate 2020” and “Oil Palm Fertilizer Recommendation for PT Tolan Tiga Indonesia – Tolan Estate 2020”. Fertilizer application records are documented in “Monthly Manuring Program Sheet”. Based on interview, fertilizer application are performed according to the SOP that refer Best Agriculture Practice and minimize the environmental impacts. By using methods</p>	Comply

		correct type, correct target and correct dosage. Application near the drainage are avoided.	
7.4.2	Periodic tissue and soil sampling is carried out to monitor and manage changes in soil fertility and plant health.	<p>Last periodical leaf sample analysis in Perlavian Estate conducted in January 2019 for preparing fertilizer recommendation 2020. Fertilizer recommendation 2020 were evident. Leaf Analysis Report was issued by Verdant Bioscience Plant and Soil Nutrition Laboratory with Ref number 17/STC-spl/XI/18, received date 5 Nov 2018, number of samples 134 bags, analysis date 4 Jan 2019, document number PSNL/TTI/XII/18/292. Sample seen Lab No.A3855; Sample type-Leaf; Estate-PLE; Div-PLIEEFD 06; Block 09A18A-A19A; Sampling date 04/09/2018; Material PM-02; Plant Year 2009; 39.86 Ha. Analysis result: 2.64% N; 0.168% P; 0.93% K; 0.23% Mg; 0.88% Ca; 13 ppm B. Sample seen Lab No.A3943; Sample type-Rachis; Estate-PLE; Div-PLIEEFD 04; Block 03D18A-D19A; Sampling date 03/10/2018; Material PM 12; Plant Year 2003; 44.32 Ha. Analysis result: 0.117% P; 2.80% K; 0.09% Mg; and 0.46% Ca.</p> <p>The last periodical leaf sample analysis in Tolan Estate conducted in May 2019 for preparing fertilizer recommendation 2020. Fertilizer recommendation 2020 were evident. Leaf Analysis Report was issued by Verdant Plant and Soil Nutrition Laboratory with Ref number 03/STC-spl/III/19, received date 11 Mar 2019, number of samples 6 bags, analysis date 9 May 2019, document number PSNL/TTI/IV/19/170. Sample seen Lab No.B683; Sample type-Leaf; Estate-TLE; Div-III; Block 99C21A; Sampling date 20/02/2019; Material BLRS; Plant Year 1999; 40.53 Ha. Analysis result: 2.44% N; 0.154% P; 0.85% K; 0.27% Mg; 0.63% Ca; 11 ppm B. Sample seen Lab No.B688; Sample type-Rachis; Estate-TLE; Div-I; Block 05D5-6; Sampling date 22/02/2019; Material BLRS; Plant Year 2005; 49.49 Ha. Analysis result: 0.148% P; 2.53% K; 0.11% Mg; and 0.46% Ca.</p> <p>JH Agriculture Service conducted the Semi-Detailed Soil Survey in October 2009 for PT Tolan Tiga Indonesia, within the semi-detailed soil survey report, topographic condition, soil fertility status and other information has been accounted into.</p>	Comply
7.4.3	A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues	<p>Nutrient recycling strategy is present. The company using all palm by-products for soil nutrient, such as: EFB and POME (is applied to palm nearby mill) and frond stacking. Permit of POME for land application as per "Keputusan Kepala Badan Pelayanan Perizinan</p>	Comply

and optimal use of inorganic fertilisers.

Terpadu dan Pernamanan Modal Kabupaten Labuhanbatu Selatan No.503/641/BPPTPM-LS/2016 tentang Izin Pemanfaatan Air Limbah Industri Minyak Kelapa Sawit pada Tanah di Perkebunan Kelapa Sawit PT Tolan Tiga Indonesia” dated 27 July 2016.

Record of POME application are documented in “Data Volume Land Application”, as example for Perlavian Estate in 2019:

Month	Application Volume (m <sup>3</sup> ) Block				Total
	05C12A	05C11A	05C10A	05C09A	
Jan	-	-	10,337	-	10,337
Feb	10,050	-	-	-	10,050
Mar	-	3,185	4,792	-	7,977
Apr	-	9,078	-	-	9,078
May	-	6,710	2,447	-	9,157
Jun	-	-	6,248	-	6,248
Jul	-	-	11,119	-	11,119
Aug	8,766	-	-	-	8,766
Sep	7,356	5,267	-	-	12,623
Oct	-	12,792	-	-	12,792
Nov	-	2,886	11,814	-	14,700
Dec	-	-	8,582	-	8,582

Block	Area (Ha)	Ditch (m)
05C09A	17.49	9,993.16
05C10A	29.39	14,758.11
05C11A	27.67	13,950.95
05C12A	21.06	11,111.10
Total	95.61	49,813.32

Record of EFB application Perlavian Estate in 2019:



		<table border="1"> <tr> <th>Div</th> <th>Area (Ha)</th> <th>EFB (Ton)</th> <th>Block</th> </tr> <tr> <td>I</td> <td>116.92</td> <td>4,080.07</td> <td>18M09, 18M10, 18N09, 18N12, 18N10, 18N11</td> </tr> <tr> <td>II</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>III</td> <td>292.29</td> <td>13,743.82</td> <td>06H09A, 06H11A, 06H06A, 06H07A, 06I07A, 06I08A, 06H10A</td> </tr> <tr> <td>IV</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>V</td> <td>48.12</td> <td>2,406.00</td> <td>95E02, 95E03</td> </tr> <tr> <td>VI</td> <td>643.99</td> <td>24,182.22</td> <td>07B17A, 08B19A, 08B21A, 08B17A, 08B18A, 08B22A, 08B23A, 08A20A, 08A23A, 07C13A, 07C16A, 07C18A, 10B14A, 10B15A, 08B19A, 08B22A, 10B15A, 10B16A.</td> </tr> <tr> <td>Total</td> <td>1,101.31</td> <td>44,412.11</td> <td></td> </tr> </table>	Div	Area (Ha)	EFB (Ton)	Block	I	116.92	4,080.07	18M09, 18M10, 18N09, 18N12, 18N10, 18N11	II	-	-	-	III	292.29	13,743.82	06H09A, 06H11A, 06H06A, 06H07A, 06I07A, 06I08A, 06H10A	IV	-	-	-	V	48.12	2,406.00	95E02, 95E03	VI	643.99	24,182.22	07B17A, 08B19A, 08B21A, 08B17A, 08B18A, 08B22A, 08B23A, 08A20A, 08A23A, 07C13A, 07C16A, 07C18A, 10B14A, 10B15A, 08B19A, 08B22A, 10B15A, 10B16A.	Total	1,101.31	44,412.11			
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Total	1,101.31	44,412.11																																		
		There is no EFB and POME application in Tolan Estate due to distance from mill.																																		
7.4.4	Records of fertiliser inputs are maintained.	<p>Fertilizer recommendation 2019 described the fertilizer need for each Estate. Records of fertilizer inputs are available in "Monthly Manuring Program" for each division and "Rekapitulasi Penggunaan Fertilizer Tahun 2019" for estate recapitulation. Fertilizer recommendation 2020 for each Estate were also available.</p> <p>Record of fertilizer input in Perlabian Estate (in kg) are as follow:</p> <table border="1"> <thead> <tr> <th>Fertilizer Type</th> <th>2019</th> <th>2020</th> </tr> </thead> <tbody> <tr> <td>Borate</td> <td>40,569.15</td> <td>-</td> </tr> <tr> <td>CuSO<sub>4</sub></td> <td>308.50</td> <td>-</td> </tr> <tr> <td>Dolomite</td> <td>247,851.00</td> <td>-</td> </tr> <tr> <td>Kieserite</td> <td>285,583.16</td> <td>16,351.00</td> </tr> <tr> <td>MOP</td> <td>955,557.75</td> <td>174,450.00</td> </tr> <tr> <td>NPK 12:12:17:2</td> <td>5,031.65</td> <td>-</td> </tr> </tbody> </table>			Fertilizer Type	2019	2020	Borate	40,569.15	-	CuSO <sub>4</sub>	308.50	-	Dolomite	247,851.00	-	Kieserite	285,583.16	16,351.00	MOP	955,557.75	174,450.00	NPK 12:12:17:2	5,031.65	-	Comply										
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<b>Criteria 7.5:</b>																											
Practices minimise and control erosion and degradation of soils.																											
7.5.1	(C) Maps identifying marginal and fragile soils, including steep terrain, are available.	JH Agriculture Service conducted the Semi-Detailed Soil Survey in October 2009 for PT. Tolan Tiga Indonesia, within the semi-detailed soil survey report, topographic condition, soil fertility status and other information has been accounted into. There is no marginal and fragile soil reported in the soil survey carried out 2009 by JH Agriculture. Recent maps are available of all soils in all estates. Limitation in form of sandy soil and surface run-off of top soil, as well as steeper terrain on Tolan Estate.	Comply																								
7.5.2	There is no extensive replanting of oil palm on steep terrain.	Based on field visit to Perlavian Estate and Tolan Estate there is no replanting or new planting of oil palm on steep terrain.	Comply																								
7.5.3	There is no new planting of oil palm on steep terrain.	Based on field visit to Perlavian Estate and Tolan Estate there is no replanting or new planting of oil palm on steep terrain.	Comply																								
<b>Criteria 7.6:</b>																											
Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.																											

7.6.1	<b>(C)</b> To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations.	There is no extensive planting or new planting carried out by the unit of certification. Not Applicable.	Comply
7.6.2	Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.	There is no extensive planting or new planting carried out by the unit of certification. Not Applicable.	Comply
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	There is no extensive planting or new planting carried out by the unit of certification. Not Applicable.	Comply
<b>Criteria 7.7</b>			
No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	<b>(C)</b> There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.	Based on JH Agriculture Semi-detailed Soil Survey Report, 2009 - there was no indication of area with peat soil in the Perlabian and Tolan estate. Drainability assessment is not applicable.	Comply
7.7.2	Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat.	Based on JH Agriculture Semi-detailed Soil Survey Report, 2009 - there was no indication of area with peat soil in the Perlabian and Tolan estate. Drainability assessment is not applicable.	Comply
<b>PROCEDURAL NOTE:</b> Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).			
7.7.3	<b>(C)</b> Subsidence of peat is monitored, documented and minimised.	Based on JH Agriculture Semi-detailed Soil Survey Report, 2009 - there was no indication of area with peat soil in the Perlabian and Tolan estate.  Peat subsidence monitoring is not applicable.	Comply
7.7.4	<b>(C)</b> A documented water and ground cover management programme is in place.	Based on JH Agriculture Semi-detailed Soil Survey Report, 2009 - there was no indication of area with peat soil in the Perlabian and Tolan estate. Not applicable.	Comply
7.7.5	<b>(C)</b> For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to	Based on JH Agriculture Semi-detailed Soil Survey Report, 2009 - there was no indication of area with peat soil in the Perlabian and Tolan estate. Not applicable.	Comply

	<p>replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p>		
<p><b>PROCEDURAL NOTE:</b> Full details of the RSPO Drainability Assessment Guidelines and related concepts and detailed actions are in the manual currently being fine-tuned/tested by PLWG. A final version should be approved by PLWG in January 2019 and will include additional guidance on the steps to be followed after the decision not to replant as well as implications for other stakeholders, smallholders, local communities and the unit of certification. It is recommended that a further twelve-month methodology trial period is proposed for all related management units (i.e. those with plantations on peat) to utilise the methodology and provide feedback to the PLWG to enable further refinement of procedure as appropriate before January 2020. Units of certification have the option to defer replanting till after the availability of the revised guidelines. Additional guidance on alternative crops and rehabilitation of natural vegetation will be provided by PLWG.</p>			
<p><b>PROCEDURAL NOTE:</b>          PLWG and the Smallholder Interim Group (SHIG) will collaboratively develop guidance for Independent Smallholders [cross links to SHIG and GHG issues].</p>			
7.7.6	<p><b>(C)</b> All existing plantings on peat are managed according to the RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2018) and associated audit guidance.</p>	<p>Based on JH Agriculture Semi-detailed Soil Survey Report, 2009 - there was no indication of area with peat soil in the Perlabian and Tolan estate. Not applicable.</p>	Comply
7.7.7	<p><b>(C)</b> All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2018) and</p>	<p>Based on JH Agriculture Semi-detailed Soil Survey Report, 2009 - there was no indication of area with peat soil in the Perlabian and Tolan estate. Not applicable.</p>	Comply

	associated audit guidance.		
<b>Criteria 7.8</b>			
Practices maintain the quality and availability of surface and groundwater.			
7.8.1	<p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p> <p>7.8.1a The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p>	<p>PT Tolan Tiga Indonesia has prepared water management plan under “Program Pengelolaan Air” issued on 4 Jan 2019. The program consisted of reporting of deep water usage; quality analysis of deep water; establish silt pit at terrace contour; making individual terrace on plant that have high risk of erosion; pesticide mixing only done in mixing area.</p> <p>The Estate management monitor the progress monthly. The Estate has provided access to clean water for the communities. The Estate has eliminated potential pollution to the water course by conduct mixing of pesticide in the mixing area only.</p> <p>Data verified:</p> <ul style="list-style-type: none"> <li>• “Keputusan Gubernur Sumatera Utara nomor 546.2/421/BPPTSU/2/XI.3b/IX/2016 tentang Izin Pengambilan Air Bawah di PT. Tolan Tiga Indonesia” dated 19 September 2019, location in sumur bor in employee housing division TTS Sripinang.</li> <li>• Surat Ketetapan Pajak Daerah (SKPD ABT) for month January 2020 was paid to Badan Pengelola Pajak Daerah in Labuhanbatu Selatan Regency</li> <li>• The company has shown the document of Water Management Plan year 2019, describing the water for mill process and domestic use are from Perlabian river. Water Management Plan, indicating the water need, permit and licensing, monitoring of water quality, infrastructure maintenance and conservation.</li> </ul>	Comply
	7.8.1b Workers have adequate access to clean water.	<p>Water Management Plan, indicating the water need, permit and licensing, monitoring of water quality, infrastructure maintenance and conservation of river buffer zone. Perlabian Estate has identified the river flows during HCV assessment and reported in HCV identification, for example: Perlabian river, Tolan river, Alangan river. Estate management has shown effort to minimize erosion impacts.</p> <p>PT Tolan Tiga Indonesia has demonstrated effort to minimize erosion, trough planting trees in river buffer zone and not applying agrochemical in designated river buffer zone.</p>	

7.8.2	<b>(C)</b> Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017).	<p>Water Management Plan, indicating the water need, permit and licensing, monitoring of water quality, infrastructure maintenance and conservation of river buffer zone. Perlabian Estate has identified the river flows during HCV assessment and reported in HCV identification, for example: Perlabian river, Tolan river, Alangan river. Estate management has shown effort to minimize erosion impacts.</p> <p>PT Tolan Tiga Indonesia has demonstrated effort to minimize erosion, through planting trees in river buffer zone and not applying agrochemical in designated river buffer zone.</p>	Comply																																																																														
7.8.3	Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.	<p>Perlabian POM has CDM Project and discharge effluent to block land applications, effluent sampling is taken regularly every month by independent third party (Binalab), e.g. water sample in "Effluent Final Discharge Pond" by BINALAB.</p> <p>Result of BOD sampling analysis has shown that no more than 5,000 mg/Liter as regulated in "Peraturan Menteri Lingkungan Hidup No. 28, year 2003". Records for monitoring/test result of effluent especially BOD for year 2019 available as below:</p> <table border="1" data-bbox="909 880 1980 1244"> <thead> <tr> <th rowspan="2">Parameter</th> <th rowspan="2">Satuan</th> <th colspan="6">Month 2019</th> </tr> <tr> <th>Jul</th> <th>Aug</th> <th>Sep</th> <th>Oct</th> <th>Nov</th> <th>Dec</th> </tr> </thead> <tbody> <tr> <td>pH</td> <td>-</td> <td>7,43</td> <td>6,27</td> <td>6,88</td> <td>6,27</td> <td>7,8</td> <td>7,67</td> </tr> <tr> <td>BOD5</td> <td>mg/l</td> <td>972</td> <td>826</td> <td>810</td> <td>863</td> <td>957</td> <td>852</td> </tr> <tr> <td>COD</td> <td>mg/l</td> <td>1980</td> <td>1720</td> <td>1628</td> <td>1787</td> <td>1822</td> <td>1659</td> </tr> <tr> <td>Minyak dan lemak</td> <td>mg/l</td> <td>&lt;5.0</td> <td>&lt;5.0</td> <td>&lt;5.0</td> <td>&lt;5.0</td> <td>&lt;5.0</td> <td>&lt;5.0</td> </tr> <tr> <td>Tembaga (Cu)</td> <td>mg/l</td> <td>&lt;0.015</td> <td>&lt;0.015</td> <td>&lt;0.015</td> <td>&lt;0.015</td> <td>&lt;0.015</td> <td>&lt;0.015</td> </tr> <tr> <td>Timbal (Pb)</td> <td>mg/l</td> <td>&lt;0.0017</td> <td>&lt;0.0017</td> <td>&lt;0.0017</td> <td>&lt;0.0017</td> <td>&lt;0.0017</td> <td>&lt;0.0017</td> </tr> <tr> <td>Cadmium (Cd)</td> <td>mg/l</td> <td>&lt;0.0022</td> <td>&lt;0.0022</td> <td>&lt;0.0022</td> <td>&lt;0.0022</td> <td>&lt;0.0022</td> <td>&lt;0.0022</td> </tr> <tr> <td>Seng (Zn)</td> <td>mg/l</td> <td>0,062</td> <td>0,94</td> <td>0,8</td> <td>0,96</td> <td>0,12</td> <td>0,087</td> </tr> </tbody> </table>	Parameter	Satuan	Month 2019						Jul	Aug	Sep	Oct	Nov	Dec	pH	-	7,43	6,27	6,88	6,27	7,8	7,67	BOD5	mg/l	972	826	810	863	957	852	COD	mg/l	1980	1720	1628	1787	1822	1659	Minyak dan lemak	mg/l	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	Tembaga (Cu)	mg/l	<0.015	<0.015	<0.015	<0.015	<0.015	<0.015	Timbal (Pb)	mg/l	<0.0017	<0.0017	<0.0017	<0.0017	<0.0017	<0.0017	Cadmium (Cd)	mg/l	<0.0022	<0.0022	<0.0022	<0.0022	<0.0022	<0.0022	Seng (Zn)	mg/l	0,062	0,94	0,8	0,96	0,12	0,087	Comply
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7.8.4	Mill water use per tonne of FFB is monitored and recorded.	Perlabian POM recording the mill water use per tonne FFB. The record of water use available in "Pemakaian air dan HSD Oil per metrik FFB". The budget of water use for FFB	Comply																																																																														

process sets at 1 m3/ton FFB processed.

Month 2019	FFB Process (ton)	Water consumption (m3)	Water consumption M3/ton FFB
Jan	17.286	14.415	0,83
Feb	14.750	13.975	0,95
Mar	12.555	12.320	0,98
Apr	14.046	12.207	0,87
May	14.524	12.087	0,83
Jun	14.751	12.320	0,84
Jul	17.713	15.654	0,88
Aug	22.894	18.088	0,79
Sep	23.733	18.105	0,76
Oct	20.678	15.867	0,77
Nov	17.417	15.806	0,91
Dec	13.645	12.815	0,94
<b>Total</b>	<b>203.995</b>	<b>173.659</b>	<b>0,85</b>

**Criteria 7.9:**

Efficiency of fossil fuel use and the use of renewable energy is optimised

7.9.1	A plan for improving efficiency of the use of fossil fuels and to optimize renewable energy is in place, monitored and reported	<p>Optimizing renewable energy in Pelabian POM from fibre and shell for fuel, recorded in "Rekaman Monitoring Penggunaan Energi Terbarukan". The use of fiber and shell from FFB in boiler generates heat; which drives electricity-generating turbines. The use of renewable energy is consistent in the percentage against non – renewable energy.</p> <p>In 2019, the records of both monitoring of kilowatt hours per tonnage of palm product (FFB and CPO) maintained.</p> <p>Calculation for total renewable energy per ton CPO:</p> <table border="1"> <thead> <tr> <th>Month</th> <th>FFB Processed (tons)</th> <th>Fruit Fibers @13% of FFB process (MT)</th> <th>Total renewable Energy /Ton CPO (kcal)</th> </tr> </thead> <tbody> <tr> <td>Jan</td> <td>17.286</td> <td>2.247</td> <td>2,074</td> </tr> </tbody> </table>	Month	FFB Processed (tons)	Fruit Fibers @13% of FFB process (MT)	Total renewable Energy /Ton CPO (kcal)	Jan	17.286	2.247	2,074	Comply
Month	FFB Processed (tons)	Fruit Fibers @13% of FFB process (MT)	Total renewable Energy /Ton CPO (kcal)								
Jan	17.286	2.247	2,074								

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Feb	14.750	1.918	2,080
Mar	12.555	1.632	1,716
Apr	14.046	1.826	1,755
May	14.524	1.888	1,734
Jun	14.751	1.918	1,698
Jul	17.713	2.303	1,679
Aug	22.894	2.976	1,695
Sep	23.733	3.085	1,671
Oct	20.678	2.688	1,754
Nov	17.417	2.264	1,764
Dec	13.645	1.774	1,789
Total	203.995	26.519	1,779

Perlabian POM POM has also demonstrated the record on improving efficiency of the use of fossil fuels and to optimize renewable energy, e.g:

Month (2019)	HSD fuel use (liter)
Jan	1,36
Feb	1,67
Mar	1,56
Apr	1,63
May	1,65
Jun	1,41
Jul	1,41
Aug	1,31
Sep	1,39
Oct	1,51
Nov	1,58
Dec	1,87
Total	<b>1,51</b>

**Criteria 7.10:**

Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.



<p>7.10.1</p>	<p><b>(C)</b> GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimize them are implemented, monitored through the Palm GHG calculator and publicly reported.</p>	<p>PT Tolan Tiga Indonesia – Perlabian POM has prepared procedure Calculation and Mitigation of Green House Gas Emission No.ENC 01-12/04-03-2019/Rev.1 dated 18 March 2019, whereby provide guidance to register source of emissions as a result of company operation, mointor and reduce the use of materials emitting GHG emission, calculate GHG emission from company operational activities. Source of emission inventory from estate operation: use of inorganic fertilizer Urea (N), Dolomite (CaO), MOP (K<sub>2</sub>O), Rock Phospate (P<sub>2</sub>O<sub>5</sub>), use of pesticide, use HSD fuel, planted area, mature oil palm, FFB production, distance estate to POM, distance POM to bulking tank, OER %, KER %, presence of methane capture facility, etc.</p> <p>Identification of pollution source has been documented under “Environmental Aspect &amp; Impact List”. Assessments have been carried out on all recognized polluting activities and include gas and smoke emissions, particulate and soot emissions, effluent control, treatment and discharge. Any significant pollutants and emissions have been identified. There is a plan in place to reduce pollution – this is included in the aspects/impacts register.</p> <p>Assessment of polluting activities including gaseous emission, particulate emission and effluent has also been done identified in the document “Pengelolaan lingkungan hidup (RKL) dan Pemantauan lingkungan hidup (RPL)”.</p> <p>The company has GHG calculation based on PalmGHG calculator V4 database period January – December 2019 and provided in attachment BM POM GHG_Palm Calculator Appendix C.</p> <p>GHG reduction plan identified under “Rencana Pengurangan Emisi Gas Rumah Kaca (GHG Emission)”:</p> <table border="1" data-bbox="913 1235 1971 1382"> <thead> <tr> <th>Stages/Activity type</th> <th>Mitigation Plan</th> <th>Implementation</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Fertilizer application</td> <td>Effective fertilizer application as per recommendation</td> <td rowspan="2"> <ul style="list-style-type: none"> <li>Leaf sampling analysis for accurate fertilizer recommendation</li> <li>Implement SOP fertilizer application</li> </ul> </td> </tr> <tr> <td>No fertilizer application in rainy</td> </tr> </tbody> </table>	Stages/Activity type	Mitigation Plan	Implementation	Fertilizer application	Effective fertilizer application as per recommendation	<ul style="list-style-type: none"> <li>Leaf sampling analysis for accurate fertilizer recommendation</li> <li>Implement SOP fertilizer application</li> </ul>	No fertilizer application in rainy	<p>Comply</p>
Stages/Activity type	Mitigation Plan	Implementation								
Fertilizer application	Effective fertilizer application as per recommendation	<ul style="list-style-type: none"> <li>Leaf sampling analysis for accurate fertilizer recommendation</li> <li>Implement SOP fertilizer application</li> </ul>								
	No fertilizer application in rainy									

			<ul style="list-style-type: none"> <li>season</li> <li>No fertilizer application on river buffer zone/riparian area</li> <li>Socialization to all level of worker on GHG mitigation plan related to impact of fertilizer application</li> </ul>	
		Use of fossil fuel for transportation (FFB, fertilizer, manpower)	<ul style="list-style-type: none"> <li>Maintenance the vehicle on regular basis</li> <li>Planting trees</li> <li>Transportation arrangement (effective and efficient)</li> <li>Socialization to all level of worker on GHG mitigation plan related to machinery use and use of fossil fuel</li> </ul>	<ul style="list-style-type: none"> <li>• Vehicle maintenance record</li> <li>• Planting record</li> <li>• Evaluation on vehicle use (incl. fuel efficiency)</li> </ul>
		Fertilizer and pesticide application	<ul style="list-style-type: none"> <li>Planting beneficial plant</li> <li>Spraying knapsack calibration</li> <li>Spraying based on weed percentage &gt;60%</li> <li>Effective fertilizer application as per recommendation</li> </ul>	<ul style="list-style-type: none"> <li>• Leaf sampling analysis for accurate fertilizer recommendation</li> <li>• Implement SOP fertilizer application</li> <li>• Utilize recommended pesticide</li> </ul>
		Use of fossil fuel for electric generation	<ul style="list-style-type: none"> <li>Maintenance the machinery (genset) on regular basis</li> <li>Socialization to all level of worker on GHG mitigation plan related to machinery use and use of fossil fuel; and electricity efficiency</li> <li>Emission monitoring on regular basis</li> </ul>	<ul style="list-style-type: none"> <li>• Vehicle maintenance record</li> <li>• Planting record</li> <li>• Evaluation on Genset's fuel efficiency</li> </ul>
		Use of fossil fuel for transportation (FFB, CPO, PK, EFB)	<ul style="list-style-type: none"> <li>Maintenance the vehicle on regular basis</li> <li>Socialization to all level of worker on GHG mitigation plan related to electricity efficiency</li> </ul>	<ul style="list-style-type: none"> <li>• Vehicle maintenance record</li> <li>• Evaluation on electricity efficiency</li> </ul>

		Operation of POM's machinery including boiler	Maintenance the POM's machinery on regular basis Socialization to all level of worker on GHG mitigation plan related to emission Emission monitoring on regular basis	<ul style="list-style-type: none"> <li>• Machinery maintenance record</li> <li>• Evaluation on boiler's efficiency</li> <li>• Emission monitoring report</li> </ul>	
7.10.2	<p><b>(C)</b> Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimize them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p>	<p>There is no new development of after 2014 in Bukit Maradja Estate and Kerasaan Estate</p> <p>Identification of significant pollution and GHG emission in each unit/station as documented in "Environmental Aspect &amp; Impact List", consist of: input, environmental aspect, caused, environmental impact potential, and control.</p> <p>Based on the verification of legal documents, identification of HCV and statement area showed that the entire HCV area fully controlled by companies.</p> <p>Based on the results of public consultation with relevant agencies and surrounding villages claimed that the entire area of HCV PT Tolan Tiga Indonesia was controlled by companies.</p>			Comply
7.10.3	<p><b>(C)</b> Other significant pollutants are identified and plans to reduce or minimize them implemented and monitored.</p>	<p>Based on Significant pollution and GHG emission was identified, for Mill comes from waste pond, reducing program has been implemented by using methane trap and for estates comes from using of pesticides, action plan to reducing pesticide was made such as program of integrated pest control where minimize to use chemical/pesticides. Graph of emission and pollutant were provided to monitor trend of them in monthly basis.</p> <ul style="list-style-type: none"> <li>• Using EFB as organic fertilizer.</li> <li>• Planting beneficial plant</li> <li>• Efficiency of fossil fuel.</li> <li>• Increasing renewable energy usage.</li> </ul> <p>Identification of significant pollution and GHG emission in each unit/station as documented in "Environmental Aspect &amp; Impact List", consist of: input, environmental</p>			Comply

		<p>aspect, caused, environmental impact potential, and control.</p> <p>Management have prepared identification and management plan for estate/plantation:</p> <ul style="list-style-type: none"> <li>• Reduce use of herbicide and pesticide <ul style="list-style-type: none"> <li>○ No application of herbicide in riparian area</li> <li>○ Planting LCC such as <i>Mucuna bracteata</i> and planting beneficial plant such as <i>Turnera subulata</i>, <i>Cassia cobanensis</i> and <i>Antigonon leptosus</i></li> <li>○ Spraying tool calibration</li> <li>○ Conduct spraying on area with weed growth over 45%.</li> <li>○ No use of <i>paraquat</i></li> </ul> </li> <li>• Reduce fossil fuel use <ul style="list-style-type: none"> <li>○ Conduct vehicle and generator set inspection</li> <li>○ Transportation arrangement</li> <li>○ Road maintenance</li> </ul> </li> <li>• Efficiency in use of fertilizer <ul style="list-style-type: none"> <li>○ Conduct fertilizer application as per recommendation</li> <li>○ Prohibit fertilizer application on river buffer zone/water body</li> </ul> </li> <li>• Planting trees <ul style="list-style-type: none"> <li>○ Planting trees around housing</li> <li>○ Planting trees around HCV area and river buffer zone</li> </ul> </li> <li>• Recycle and reuse empty chemical container <ul style="list-style-type: none"> <li>○ Hazardous waste collected and disposed off responsibly</li> <li>○ Handing over hazardous waste to licensed contractor</li> </ul> </li> </ul>	
<p><b>Criteria 7.11:</b>  Fire is not used for preparing land and is prevented in the managed area.</p>			
7.11.1	<b>(C)</b> Land for new planting or replanting is not prepared by burning.	Based on field visit and document review there is no new planting or replanting preparation carried out by burning.	Comply
7.11.2	The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification.	Based on field visit and document review there is no new planting or replanting preparation carried out by burning.	Comply
7.11.3	The unit of certification engages with adjacent	PT Tolan Tiga Indonesia has established fire prevention committee as documented in	Comply

	<p>stakeholders on fire prevention and control measures.</p>	<p>"Tim Satuan Tugas Pengendalian Kebakaran Lahan Perkebunan" dated 19 Nov 2019. The committee consist of: Chairman; Secretary; PIC for prevention; PIC for control; PIC for Logistic; Main Team consist of 2 team; Support Team consist of 2 team; Helper Team consist of 2; team each team consist of 5 personnel.</p>	
<p><b>Criteria 7.12:</b>          Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.</p>			
<p><b>PROCEDURAL NOTE for 7.12:</b>          The 2018 RSPO P&amp;C include new requirements to ensure the effective contribution of RSPO to halting deforestation. This will be achieved by incorporating the High Carbon Stock Approach (HCSA) Toolkit in the revised standard.          The RSPO ToC also commits RSPO to balancing sustainable livelihoods and poverty reduction with the need to conserve, protect and enhance ecosystems. High Forest Cover Countries (HFCCs) urgently require economic opportunities that enable communities to choose their own development path, while providing socio-economic benefits and safeguards.           Adapted procedures will be developed to support the sustainable development of palm oil by indigenous peoples and local communities with legal or customary rights. These will apply in specific HFCCs, and within those, in High Forest Cover Landscapes (HFCLs).          The development of these procedures will be guided by a No Deforestation Joint Steering Group (NDJSG) of RSPO and HCSA members. In HFCCs, RSPO will work through national and local participatory processes with governments, communities and other stakeholders to develop these procedures. A timeframe for these activities is stipulated in the Terms of Reference for the NDJSG and publicly available.</p>			
<p>7.12.1</p>	<p><b>(C)</b> Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests.           A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</p>	<p>PT. Tolan Tiga Indonesia have conducted the HCV assessment for Perlabian Estate in cooperation with "Yayasan Kelapa Sawit Berkelanjutan" in 2009 based on Indonesian Toolkit – 2008. The assessment team comprise of: Ir Purwo Susanto, (Team Leader, RSPO approved HCV Assessor); Dr. Kunkun Jaka Gurmaya, (biodiversity, RSPO approved HCV Assessor); Neny Indriyana, S.Hut, M.T, (Biodiversity); Ir. Riswan SHut, (GIS); Dr. Edy Syahputra, (environmental service); Dr. Asril Darussamin, (HCV Trainer). At the time of the preparation of HCV documents there has been no scheme related ALS, however, team leader has qualified as an "assessor RSPO HCV Approved". The HCV assessment exercise carried out on 23-29 July 2009 with involvement from surrounding community through focuse group discussion and interviews. The public consultation process done in 3 August 2009, with 36 representatives from surrounding village, individuals, traditional leaders, district head, NGO presence.          Based on HCV assessment, there was no primary forest and/or peat ecosystem in the</p>	<p>Comply</p>

		<p>estate; mainly cultivated with oil palm and the rest was road infrastructure, housing, and other worker facilities.</p> <p>Based on document and field verification, HCV area identified:</p> <ul style="list-style-type: none"> <li>• Area HCV 1 of 30.67 Ha in form of Reservoir Pond, whereby overlapping with;</li> <li>• Area HCV 4 of 30.67 Ha in form of Reservoir Pond.</li> <li>• Area Potency HCV 1 and HCV 4 of 188.16 Ha in form of riparian zone of Alangan III River, Tolan River and Perlabian River.          Note: Potency HCV means HCV that might present inside planted area; as recommended by YASBI, potency HCV becomes HCV after the planted area being replanted. Potency HCV in planted area treated same as HCV area, whereby no chemical regime, upkeep, etc.</li> <li>• Area HCV 6 of 3.45 Ha in form of graveyard In Division I (Block L08), Division II (Block I09), Division III (Block E05) and Division V (Block B12 dan E17).</li> </ul> <p>Total HCV Area identified in Perlabian Estate was 59.38 Ha, comprise of area of HCV 1 (overlapping with) and HCV 4 of 30.67 Ha; and HCV 6 of 3.45 Ha. An additional HCV 1 and 4 of 25.26 Ha comes from potency HCV.</p> <p>PT. Tolan Tiga Indonesia have conducted the HCV assessment for Tolan Estate in cooperation with "Yayasan Kelapa Sawit Berkelanjutan" in 2009 based on Indonesian Toolkit – 2008. The assessment team comprise of: Ir Purwo Susanto, (Team Leader, RSPO approved HCV Assessor); Dr. Kunkun Jaka Gurmaya, (biodiversity, RSPO approved HCV Assessor); Neny Indriyana, S.Hut, M.T, (Biodiversity); Ir. Riswan SHut, (GIS); Dr. Edy Syahputra, (environmental service); Dr. Asril Darussamin, (HCV Trainer). At the time of the preparation of HCV documents there has been no scheme related ALS, however, team leader has qualified as an "assessor RSPO HCV Approved". The HCV assessment exercise carried out on 29-31 July 2009 with involvement from surrounding community through focuse group discussion and interviews. The public consultation process done in 3 August 2009, with 36 representatives from surrounding village, individuals, traditional leaders, district head, NGO presence.</p> <p>Based on HCV assessment, there was no primary forest and/or peat ecosystem in the</p>	
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		<p>estate; mainly cultivated with oil palm and the rest was road infrastructure, housing, and other worker facilities.</p> <p>Based on document and field verification, HCV area identified:</p> <ul style="list-style-type: none"> <li>• Area HCV 1 of 32.99 Ha in form of forested land, riparian to Kwan Heng Lake and end of exairstrip;</li> <li>• Area HCV 4 of 50.78 Ha in form of riparian to water spring, riparian to Kwan Heng Lake, and hilly area in block F36.</li> <li>• Area Potency HCV 1 of 248.18 Ha in form of riparian zone to Perlabian River, riparian zone to Tolan River, riparian zone Sisumut River, riparian zone of Merbau/Sosopan River. Note: Potency HCV means HCV that might present inside planted area; as recommended by YASBI, potency HCV becomes HCV after the planted area being replanted. Potency HCV in planted area treated same as HCV area, whereby no chemical regime, upkeep, etc.</li> <li>• Area HCV 6 of 0.19 Ha in form of graveyard in Division II (Block E10), Division V (Block C33).</li> </ul> <p>Total HCV Area in Tolan Estate was 55.99 Ha comprise of HCV 1 on 32.99 Ha and (some overlapping with) HCV 4 of 50.78 Ha; and area HCV 6 of 0.19 Ha. HCV 1, 4 and 6 of 51.06 Ha, and additional HCV 1 of 4.93 Ha from potency HCV 1.</p> <p>Total HCV area in PT. Tolan Tiga Indonesia are 115.37 Ha; this figure was comprise of HCV area in Perlabian Estate of 59.38 Ha and HCV area in Tolan Estate of 55.99 Ha (total 115.37 Ha). Audit team verified during field visit, even after replanting in Perlabian Estate, the HCV area maintained with boundary.</p>	
7.12.2	<p><b>(C)</b> HCVs, HCS forests and other conservation areas are identified as follows:          7.12.2a For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p>	<p>Perlabian POM and its supply bases is long-established plantation. HCV assessment conducted in 2009 and still using RSPO HCV Approved assessor.          There is no land clearing after 15 November 2018 by unit of certification.</p>	Comply

	<p>7.12.2 b: Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p>	<p>Perlabian POM and its supply bases is long-established plantation. HCV assessment conducted in 2009 and still using RSPO HCV Approved assessor. There is no land clearing after 15 November 2018 by unit of certification.</p>	
<p><b>PROCEDURAL NOTE for 7.12.2:</b>          For details of transitional measures, refer to Annex 5: RSPO transition from HCV assessments to HCV-HCSA assessments.</p>			
<p>7.12.3</p>	<p><b>(C)</b> In High Forest Cover Landscapes (HFCLs) within HFCCs, a specific procedure will apply for legacy cases and development by indigenous peoples and local communities with legal or customary rights, taking into consideration regional and national multi-stakeholder processes. Until this procedure is developed and endorsed, 7.12.2 applies.</p>	<p>PT. Tolan Tiga Indonesia have conducted the HCV assessment for Perlabian Estate in cooperation with "Yayasan Kelapa Sawit Berkelanjutan" in 2009 based on Indonesian Toolkit – 2008. The assessment team comprise of: Ir Purwo Susanto, (Team Leader, RSPO approved HCV Assessor); Dr. Kunkun Jaka Gurmaya, (biodiversity, RSPO approved HCV Assessor); Neny Indriyana, S.Hut, M.T, (Biodiversity); Ir. Riswan SHut, (GIS); Dr. Edy Syahputra, (environmental service); Dr. Asril Darussamin, (HCV Trainer). At the time of the preparation of HCV documents there has been no scheme related ALS, however, team leader has qualified as an "assessor RSPO HCV Approved". The HCV assessment exercise carried out on 23-29 July 2009 with involvement from surrounding community through focuse group discussion and interviews. The public consultation process done in 3 August 2009, with 36 representatives from surrounding village, individuals, traditional leaders, district head, NGO presence.</p> <p>Based on HCV assessment, there was no primary forest and/or peat ecosystem in the estate; mainly cultivated with oil palm and the rest was road infrastructure, housing, and other worker facilities.</p> <p>Based on document and field verification, HCV area identified:</p> <ul style="list-style-type: none"> <li>• Area HCV 1 of 30.67 Ha in form of Reservoir Pond, whereby overlapping with;</li> <li>• Area HCV 4 of 30.67 Ha in form of Reservoir Pond.</li> <li>• Area Potency HCV 1 and HCV 4 of 188.16 Ha in form of riparian zone of Alangan III River, Tolan River and Perlabian River.</li> </ul> <p>Note: Potency HCV means HCV that might present inside planted area; as recommended by YASBI, potency HCV becomes HCV after the planted area being</p>	<p>N/A</p>



		<p>replanted. Potency HCV in planted area treated same as HCv area, whereby no chemical regime, upkeep, etc.</p> <ul style="list-style-type: none"> <li>• Area HCV 6 of 3.45 Ha in form of graveyard In Division I (Block L08), Division II (Block I09), Division III (Block E05) and Division V (Block B12 dan E17).</li> </ul> <p>Total HCV Area identified in Perlavian Estate was 59.38 Ha, comprise of area of HCV 1 (overlapping with) and HCV 4 of 30.67 Ha; and HCV 6 of 3.45 Ha. An additional HCV 1 and 4 of 25.26 Ha comes from potency HCV.</p> <p>PT. Tolan Tiga Indonesia have conducted the HCV assessment for Tolan Estate in cooperation with "Yayasan Kelapa Sawit Berkelanjutan" in 2009 based on Indonesian Toolkit – 2008. The assessment team comprise of: Ir Purwo Susanto, (Team Leader, RSPO approved HCV Assessor); Dr. Kunkun Jaka Gurmaya, (biodiversity, RSPO approved HCV Assessor); Neny Indriyana, S.Hut, M.T, (Biodiversity); Ir. Riswan SHut, (GIS); Dr. Edy Syahputra, (environmental service); Dr. Asril Darussamin, (HCV Trainer). At the time of the preparation of HCV documents there has been no scheme related ALS, however, team leader has qualified as an "assessor RSPO HCV Approved". The HCV assessment exercise carried out on 29-31 July 2009 with involvement from surrounding community through focuse group discussion and interviews. The public consultation process done in 3 August 2009, with 36 representatives from surrounding village, individuals, traditional leaders, district head, NGO presence.</p> <p>Based on HCV assessment, there was no primary forest and/or peat ecosystem in the estate; mainly cultivated with oil palm and the rest was road infrastructure, housing, and other worker facilities.</p> <p>Based on document and field verification, HCV area identified:</p> <ul style="list-style-type: none"> <li>• Area HCV 1 of 32.99 Ha in form of forested land, riparian to Kwan Heng Lake and end of exairstrip;</li> <li>• Area HCV 4 of 50.78 Ha in form of riparian to water spring, riparian to Kwan Heng Lake, and hilly area in block F36.</li> <li>• Area Potency HCV 1 of 248.18 Ha in form of riparian zone to Perlavian River, riparian zone to Tolan River, riparian zone Sisumut River, riparian zone of Merbau/Sosopan River. Note: Potency HCV means HCV that might present inside planted area; as recommended by YASBI, potency HCV becomes HCV after the planted area being</li> </ul>	
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		<p>replanted. Potency HCV in planted area treated same as HCv area, whereby no chemical regime, upkeep, etc.</p> <ul style="list-style-type: none"> <li>• Area HCV 6 of 0.19 Ha in form of graveyard in Division II (Block E10), Division V (Block C33).</li> </ul> <p>Total HCV Area in Tolan Estate was 55.99 Ha comprise of HCV 1 on 32.99 Ha and (some overlapping with) HCV 4 of 50.78 Ha; and area HCV 6 of 0.19 Ha. HCV 1, 4 and 6 of 51.06 Ha, and additional HCV 1 of 4.93 Ha from potency HCV 1.</p> <p>Total HCV area in PT. Tolan Tiga Indonesia are 115.37 Ha; this figure was comprise of HCV area in Perlabian Estate of 59.38 Ha and HCV area in Tolan Estate of 55.99 Ha (total 115.37 Ha). Audit team verified during field visit, even after replanting in Perlabian Estate, the HCV area maintained with boundary.</p>	
<p><b>PROCEDURAL NOTE for 7.12.3:</b>          There should be demonstrable benefits to the local community; clear recognition of legal and customary lands based on participatory land use planning; development should be proportional to the needs of the local community; with a balance between conservation and development. This procedure will also cover planting on previous or abandoned agricultural land / plantations. All other P&amp;C requirements apply, including FPIC and HCV requirements.</p>			
<p>7.12.4</p>	<p><b>(C)</b> Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p>	<p>PT. Tolan Tiga Indonesia have conducted the HCV assessment for Perlabian Estate in cooperation with "Yayasan Kelapa Sawit Berkelanjutan" in 2009 based on Indonesian Toolkit – 2008. The assessment team comprise of: Ir Purwo Susanto, (Team Leader, RSPO approved HCV Assessor); Dr. Kunkun Jaka Gurmaya, (biodiversity, RSPO approved HCV Assessor); Neny Indriyana, S.Hut, M.T, (Biodiversity); Ir. Riswan SHut, (GIS); Dr. Edy Syahputra, (environmental service); Dr. Asril Darussamin, (HCV Trainer). At the time of the preparation of HCV documents there has been no scheme related ALS, however, team leader has qualified as an "assessor RSPO HCV Approved". The HCV assessment exercise carried out on 23-29 July 2009 with involvement from surrounding community through focuse group discussion and interviews. The public consultation process done in 3 August 2009, with 36 representatives from surrounding village, individuals, traditional leaders, district head, NGO presence.</p> <p>Based on HCV assessment, there was no primary forest and/or peat ecosystem in the estate; mainly cultivated with oil palm and the rest was road infrastructure, housing, and other worker facilities.</p>	<p>Comply</p>

		<p>Based on document and field verification, HCV area identified:</p> <ul style="list-style-type: none"> <li>• Area HCV 1 of 30.67 Ha in form of Reservoir Pond, whereby overlapping with;</li> <li>• Area HCV 4 of 30.67 Ha in form of Reservoir Pond.</li> <li>• Area Potency HCV 1 and HCV 4 of 188.16 Ha in form of riparian zone of Alangan III River, Tolan River and Perlavian River.</li> </ul> <p>Note: Potency HCV means HCV that might present inside planted area; as recommended by YASBI, potency HCV becomes HCV after the planted area being replanted. Potency HCV in planted area treated same as HCV area, whereby no chemical regime, upkeep, etc.</p> <ul style="list-style-type: none"> <li>• Area HCV 6 of 3.45 Ha in form of graveyard In Division I (Block L08), Division II (Block I09), Division III (Block E05) and Division V (Block B12 dan E17).</li> </ul> <p>Total HCV Area identified in Perlavian Estate was 59.38 Ha, comprise of area of HCV 1 (overlapping with) and HCV 4 of 30.67 Ha; and HCV 6 of 3.45 Ha. An additional HCV 1 and 4 of 25.26 Ha comes from potency HCV.</p> <p>PT. Tolan Tiga Indonesia have conducted the HCV assessment for Tolan Estate in cooperation with "Yayasan Kelapa Sawit Berkelanjutan" in 2009 based on Indonesian Toolkit – 2008. The assessment team comprise of: Ir Purwo Susanto, (Team Leader, RSPO approved HCV Assessor); Dr. Kunkun Jaka Gurmaya, (biodiversity, RSPO approved HCV Assessor); Neny Indriyana, S.Hut, M.T, (Biodiversity); Ir. Riswan SHut, (GIS); Dr. Edy Syahputra, (environmental service); Dr. Asril Darussamin, (HCV Trainer). At the time of the preparation of HCV documents there has been no scheme related ALS, however, team leader has qualified as an "assessor RSPO HCV Approved". The HCV assessment exercise carried out on 29-31 July 2009 with involvement from surrounding community through focuse group discussion and interviews. The public consultation process done in 3 August 2009, with 36 representatives from surrounding village, individuals, traditional leaders, district head, NGO presence.</p> <p>Based on HCV assessment, there was no primary forest and/or peat ecosystem in the estate; mainly cultivated with oil palm and the rest was road infrastructure, housing, and other worker facilities.</p> <p>Based on document and field verification, HCV area identified:</p> <ul style="list-style-type: none"> <li>• Area HCV 1 of 32.99 Ha in form of forested land, riparian to Kwan Heng Lake and end of exairstrip;</li> </ul>	
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		<ul style="list-style-type: none"> <li>• Area HCV 4 of 50.78 Ha in form of riparian to water spring, riparian to Kwan Heng Lake, and hilly area in block F36.</li> <li>• Area Potency HCV 1 of 248.18 Ha in form of riparian zone to Perlarian River, riparian zone to Tolan River, riparian zone Sisumut River, riparian zone of Merbau/Sosopan River. Note: Potency HCV means HCV that might present inside planted area; as recommended by YASBI, potency HCV becomes HCV after the planted area being replanted. Potency HCV in planted area treated same as HCV area, whereby no chemical regime, upkeep, etc.</li> <li>• Area HCV 6 of 0.19 Ha in form of graveyard in Division II (Block E10), Division V (Block C33).</li> </ul> <p>Total HCV Area in Tolan Estate was 55.99 Ha comprise of HCV 1 on 32.99 Ha and (some overlapping with) HCV 4 of 50.78 Ha; and area HCV 6 of 0.19 Ha. HCV 1, 4 and 6 of 51.06 Ha, and additional HCV 1 of 4.93 Ha from potency HCV 1.</p> <p>Total HCV area in PT. Tolan Tiga Indonesia are 115.37 Ha; this figure was comprise of HCV area in Perlarian Estate of 59.38 Ha and HCV area in Tolan Estate of 55.99 Ha (total 115.37 Ha). Audit team verified during field visit, even after replanting in Perlarian Estate, the HCV area maintained with boundary.</p> <p>There is no land clearing after 15 November 2018. HCV assessment conducted in 2009.</p>	
7.12.5	Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peatland and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.	There is no land clearing after 15 November 2018. HCV assessment conducted in 2009.	Comply
7.12.6	All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary	HCV Area Monitoring Checklist dated 31 January 2020. All identified HCV in well condition and managed. HCV 6: Cemetery (Block C33 Div. 5 Tolan Est.) – No RTE species founded, common birds and long tail macaque are identified; HCV 4: Buffer zone (Block 36 Div. 5 Tolan Est.) – No RTE species found, bushes bird founded. HCV 1: Protected Forest (Block D19 and E20 Div. III Tolan Est.) – Lizard, Long tail macaque.	Comply

	measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.		
7.12.7	The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.	There is no land clearing after 15 November 2018. HCV assessment conducted in 2009. Monitoring of HCV area conducted in monthly basis by conservation officer.	Comply
7.12.8	<b>(C)</b> Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.	There is no land clearing after 15 November 2018. HCV assessment conducted in 2009.	Comply

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**Appendix B: Approved Time Bound Plan**

Name of company	Name of Mill	Location	Supply Base	Time Bound Plan	Target Year for RSPO
PT. Agro Muko	Muko Muko Mill	Mukomuko Regency, Bengkulu Province, Indonesia	Muko Muko Estate, Sei Betung Estate, Tanah Rekah Estate, Talang Petai Estate, Sei Kiang Estate and KMD	2011	Certified
	Bunga Tanjung Mill	Mukomuko Regency, Bengkulu Province, Indonesia	Bunga Tanjung Estate, Air Bikuk Estate, Air Buluh Estate and KMD	2011	Certified
			PT. Mukomuko Agro Sejahtera: • Air Manjunta Estate • Malin Deman Estate	2014	Certified
			Ex. PT. Asri Rimba Wirabhakti (acquisition in 2018)	2020	A new NPP will be submitted waiting for HCV, LUC review
PT. Tolan Tiga	Bukit Maradja Mill	Simalungun Regency, North Sumatera, Indonesia	• Bukit Maradja Estate (PT. Eastern Sumatra Indonesia) • Kerasaan Estate (PT. Kerasaan Indonesia) • Timbang Deli Estate (PT. Timbang Deli Indonesia)	2010  2018	Certified May 2010  Certified in 2018 as supply base of Bukit Maradja POM, PT Eastern Sumatra Indonesia
			Perlabian Mill	Labuhan Batu Selatan Regency, North Sumatera, Indonesia	Perlabian Estate and Tolan Estate.
	Umbul Mas Wisesa Mill	Labuhan Batu Selatan Regency, North Sumatera, Indonesia	UMW South Estate, UMW North Estate and Toton Usaha Mandiri Estate	2014	Certified in March 2015
PT. Agro Kati Lama		Musirawas Regency, South Sumatera, Indonesia		2021	developed (It has been RSPO NPP), RSPO public Notification on 31 <sup>st</sup> March 2014.
PT. Agro Rawas Ulu		Musirawas Regency, South Sumatera, Indonesia		2024	developed (It has been RSPO NPP), RSPO public Notification on 31 <sup>st</sup> March 2014.
PT. Agro Muara Rupit		Musirawas Regency, South Sumatera, Indonesia		2024	developed (It has been RSPO NPP), RSPO public Notification on 31 <sup>st</sup> March 2014.
Hargy Oil Palm Limited (HOPL)	Hargy Mill	East of Bialla, West New Britain Province, PNG	Hargy Estate	2009	Certified in April 2009
	Navo Mill	50 Kms East of Bialla, West New Britain Province, PNG	Navo Estate, Bakada Estate and Mengen Estate	2009	Certified in April 2009
	Barema Mill	30 km East of Bialla, West New Britain Province, PNG	Barema Estate	2014	RSPO Certified in April 2014
PT. Dendy Maker Indah Lestari	Dendy Maker Mill	Musirawas Regency, Sumatera Indonesia	Utara South Province, Sei Mandang Estate, Sei Liam Estate	2015	Acquired on 1 August 2017. RSPO certified in 2015.

PT Citra Sawit Mandiri	N/A	Labuhan Batu Regency, North Sumatera, Indonesia	Citra Sawit Mandiri Estate	2023	<ul style="list-style-type: none"> <li>○ AMDAL/SEIA completed</li> <li>○ RaCP process in progress including LUCA, HCV and FPIC verification</li> </ul>
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**Appendix C: GHG Reporting Executive Summary**

The GHG emissions that were produced in **January 2019 – December 2019** for **Perlabian POM** and supply base was calculated using the PalmGHG Calculator version 3.0.1. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in **January 2019 – December 2019** for **Perlabian POM** and supply base are as following:

Emission per product	tCO <sub>2</sub> e/tProduct
CPO	0.31
PK	0.31

Extraction	%
OER	21.84
KER	5.68

Production	t/yr
FFB Process	213,596.05
CPO Produced	46,622.80
PKO Produced	12,003.25

Land Use	Ha
Oil palm planted on mineral soil	8,147.7
Oil palm planted area on peat	0
Conservation area (forested)	0
Conservation area (non-forested)	135
Total Planted area	8,147.7
Conservation area	135
FFB Production per hectare	24.66

**Summary of Field Emission and Sink**

	Own Crop*		Group		3 <sup>rd</sup> Party		Total	
	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB
<b>Emission Source</b>								
Land Conservation	30,320.16	9.79	0	0	0	0	30,320.16	9.79
CO <sub>2</sub> Emission from fertilizer	1,631.74	0.53	0	0	0	0	1,631.74	0.53
NO <sub>2</sub> Emission from peat	0	0	0	0	0	0	0	0
NO <sub>2</sub> Emission from fertilizer	1,551.79	0.5	0	0	0	0	1,551.79	0.5
Fuel Consumption	126.51	0.04	0	0	0	0	126.51	0.04
Peat Oxidation	0	0	0	0	0	0	0	0
<b>Sink</b>								
Crop Sequestration	-28,441.41	-0.18	0	0	0	0	-28,441.41	-0.18
Conservation Sequestration	0	0	0	0	0	0	0	0
<b>Total</b>	<b>5,288.79</b>	<b>3,088.57</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>5,288.79</b>	<b>3,088.57</b>



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**Summary of Mill Emission and Credit**

	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB
<b>Emission</b>		
POME	46,834.02	0.23
Fuel Consumption	959.33	0
Grid Electricity Utilization	3,243.11	0.02
<b>Credit</b>		
Export of Grid Electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
<b>Total</b>	<b>51,036.47</b>	<b>0.25</b>

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

<b>Emissions</b>	<b>tCO<sub>2</sub>e</b>
PK from own mill	0
PK from other source	0
Fuel Consumptions	0
<b>Total Crusher emissions</b>	<b>0</b>

\*This mill has no kernel crusher operation.

<b>Palm Oil Mill Effluent (POME) Treatment:</b>	
Divert to Compost (%)	0
Divert to anaerobic diversion (%)	100

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

**Appendix D: Supply Chain Declaration**

<b>A. Monthly Records of Certified and Uncertified FFB Received since the last audit</b>				
<b>No.</b>	<b>Month - Year</b>	<b>Volume of FFB from certified supply bases (mt)</b>	<b>Volume of FFB from uncertified supply bases (mt)</b>	<b>Total FFB/Month (mt)</b>
1	March 2019	19,392.80	-	19,392.80
2	April 2019	15,150.38	-	15,150.38
3	May 2019	16,730.57	-	16,730.57
4	June 2019	16,510.70	-	16,510.70
5	July 2019	17,739.33	-	17,739.33
6	August 2019	12,873.07	-	12,873.07
7	September 2019	21,953.30	-	21,953.30
8	October 2019	19,428.91	-	19,428.91
9	November 2019	19,374.10	-	19,374.10
10	December 2019	22,359.36	-	22,359.36
11	January 2020	16,008.77	-	16,008.77
12	February 2020	16,074.76	-	16,074.76
<b>Total</b>		<b>213,596.05</b>	<b>-</b>	<b>213,596.05</b>
<b>Note:</b>				
<i>Last Audit: March 2019</i>				

<b>B. Monthly Records of Certified CPO &amp; PK since the last audit</b>			
<b>No.</b>	<b>Month - Year</b>	<b>Certified CPO (mt)</b>	<b>Certified PK (mt)</b>
1	March 2019	4,279.00	1,095.32
2	April 2019	3,415.89	869.54
3	May 2019	3,746.23	942.96
4	June 2019	3,684.91	936.04
5	July 2019	3,886.30	1,000.89
6	August 2019	2,699.17	713.09

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7	September 2019	4,878.54	1,135.19
8	October 2019	4,103.10	1,081.21
9	November 2019	4,011.85	1,114.25
10	December 2019	4,864.99	1,259.61
11	January 2020	3,464.99	942.97
12	February 2020	3,587.84	912.18
<b>Total</b>		<b>46,622.80</b>	<b>12,003.25</b>

**Note:**

*Last Audit: March 2019*

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<b>C. Records of Certified CPO &amp; PK Sold under PalmTrace to Buyers since the last audit (if any)</b>				
<b>No.</b>	<b>Buyers Name</b>	<b>Palmtrace Trading License Number</b>	<b>Certified CPO Sold (mt)</b>	<b>Certified PK Sold (mt)</b>
1	MNA	TR-f1ea0e90-c94d	-	395.83
2	MNA	TR-2936f905-2f5c	-	104.17
3	IMT	TR-99259dc6-0e33	-	200.00
4	IMT	TR-c3eaa40e-573b	-	805.94
5	IMT	TR-c97f7d5b-cc9f	-	44.06
6	SM	TR-2388c157-8797	-	473.73
7	SM	TR-83e4512f-658e	-	151.27
8	SM	TR-b51002eb-91f3	-	453.00
9	SM	TR-e1d2ae2c-beee	-	124.93
10	SM	TR-ed2d9d21-ae17	-	345.88
11	IMT	TR-c4cc5e77-d562	-	450.15
12	SM	TR-4941313a-b3ab	-	25.57
13	IMT	TR-7b22939f-ce21	-	49.85
14	IMT	TR-a954492d-df6e	-	898.54
15	SM	TR-588be23e-f5ff	-	3.62
16	SM	TR-095508e6-f683	-	100.00
17	IMT	TR-971c014a-fbce	-	301.46
18	IMT	TR-971fdcf8-d085	-	529.29
19	IMT	TR-b55a5452-b534	-	170.71
20	IMT	TR-e158f7a8-624f	-	600.00
21	IMT	TR-095508e6-f683	-	600.00
22	IMT	TR-971c014a-fbce	-	328.01
23	IMT	TR-1f46276c-dd6b	-	571.99
24	IMT	TR-b55a5452-b534	-	522.46
25	IMT	TR-e158f7a8-624f	-	377.54
26	IMT	TR-848c5698-8d74	-	388.09
27	SM	TR-f1ea0e90-c94d	-	446.51
28	IMT	TR-2936f905-2f5c	-	111.91
29	SM	TR-99259dc6-0e33	-	53.49
30	IMT	TR-c3eaa40e-573b	-	192.86
31	SM	TR-c97f7d5b-cc9f	-	344.99
	<b>Total</b>			<b>10,165.85</b>

**Note:**  
*Last Audit: March 2019*

<b>D. Records of CPO &amp; PK Sold under other schemes to Buyers since the last audit (if any)</b>				
<b>No.</b>	<b>Buyers Name</b>	<b>Scheme Name</b>	<b>CPO Sold (mt)</b>	<b>PK Sold (mt)</b>
1	IMT	ISCC	3,245.58	-
2	IMT	ISCC	3,494.47	-

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3	IMT	ISCC	498.74	-
4	IMT	ISCC	410.91	-
5	IMT	ISCC	1,746.08	-
6	IMT	ISCC	88.12	-
7	IMT	ISCC	480.63	-
8	IMT	ISCC	499.08	-
9	IMT	ISCC	495.14	-
10	IMT	ISCC	1,021.62	-
11	IMT	ISCC	214.18	-
12	IMT	ISCC	499.39	-
13	IMT	ISCC	499.05	-
14	IMT	ISCC	1,927.39	-
15	IMT	ISCC	1,147.46	-
16	IMT	ISCC	314.7	-
17	IMT	ISCC	47.61	-
18	IMT	ISCC	995.72	-
19	IMT	ISCC	174.43	-
20	IMT	ISCC	1,355.15	-
21	IMT	ISCC	324.43	-
22	IMT	ISCC	500	-
23	IMT	ISCC	9.01	-
24	IMT	ISCC	987.96	-
25	IMT	ISCC	998.95	-
26	IMT	ISCC	629.36	-
27	IMT	ISCC	868.17	-
28	IMT	ISCC	9.71	-
29	IMT	ISCC	499.07	-
30	IMT	ISCC	499.2	-
31	IMT	ISCC	2,731.43	-
32	IMT	ISCC	13.43	-
33	IMT	ISCC	486.45	-
34	IMT	ISCC	498.84	-
35	IMT	ISCC	2,825.79	-
36	IMT	ISCC	12.66	-
37	IMT	ISCC	1,265.37	-
38	IMT	ISCC	998.39	-
39	IMT	ISCC	694.24	-
40	IMT	ISCC	498.67	-
41	IMT	ISCC	623.54	-
<b>Total</b>			<b>37,957.12</b>	-

**Note:**

*Last Audit: March 2019*

<b>E. Records of CPO &amp; PK Sold as conventional to Buyers since the last audit (if any)</b>			
<b>No.</b>	<b>Buyers Name</b>	<b>CPO Sold (mt)</b>	<b>PK Sold (mt)</b>
1	MNA		173.97
2	MNA		489.39
3	MM		532.66

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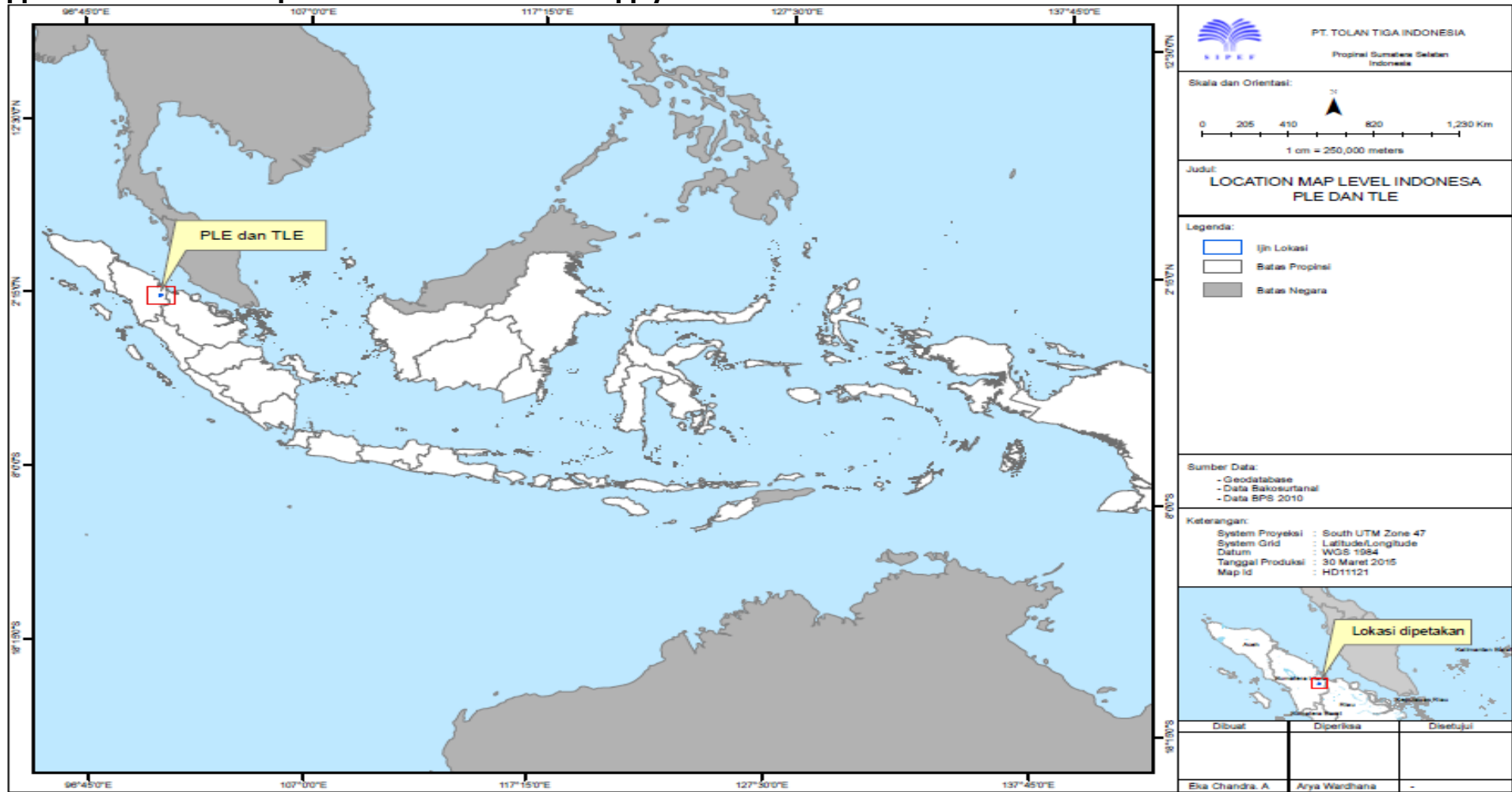
4	MM		67.34
5	MM	500	
6	TF	0.09	
7	TJ	0.03	
8	TJ	0.04	
9	TS	0.02	
10	TSA	0.1	
11	MNA	1,000	
12	TJ	0.05	
13	TS	0.08	
14	TF	0.293	
15	TSA	0.02	
16	TS	0.14	
17	TJ	0.013	
18	TS	0.06	
19	TS	0.02	
20	TSA	0.01	
21	TS	0.06	
22	TS	0.16	
23	TF	0.46	
24	TF	0.176	
25	TSA	0.05	
26	TSA	0.12	
27	TSA	0.066	
28	TSA	0.03	
29	TS	0.07	
30	TS	0.02	
31	TS	0.03	
32	TSA	0.261	
33	TJ	0.03	
34	TS	0.11	
35	TS	0.03	
36	TF	0.2	
37	TF	0.08	
38	TS	0.13	
39	TSA	0.02	
40	TJ	0.23	
41	TJ	0.012	
42	TS	0.16	
43	TS	0.02	
44	TF	0.13	
45	TF	0.18	
46	TSA	0.1	
47	TJ	0.05	
48	TF	0.12	
49	TF	0.13	
50	TF	0.04	
51	TF	0.21	
52	TS	0.18	
53	TS	0.16	

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54	TF	0.14	
55	TF	0.15	
<b>Total</b>		<b>1,505.08</b>	<b>1,263.36</b>
<b>Note:</b> <i>Last Audit: March 2019</i>			

<b>F. Records of Certified CPO Sold under RSPO Credits to Buyers since the last audit (if any)</b>			
<b>No.</b>	<b>Buyers Name</b>	<b>PalmTrace Trading License Number</b>	<b>RSPO Credits of Certified CPO Sold (mt)</b>
	Nil		
<b>Note:</b> <i>Last Audit: March 2019</i>			

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



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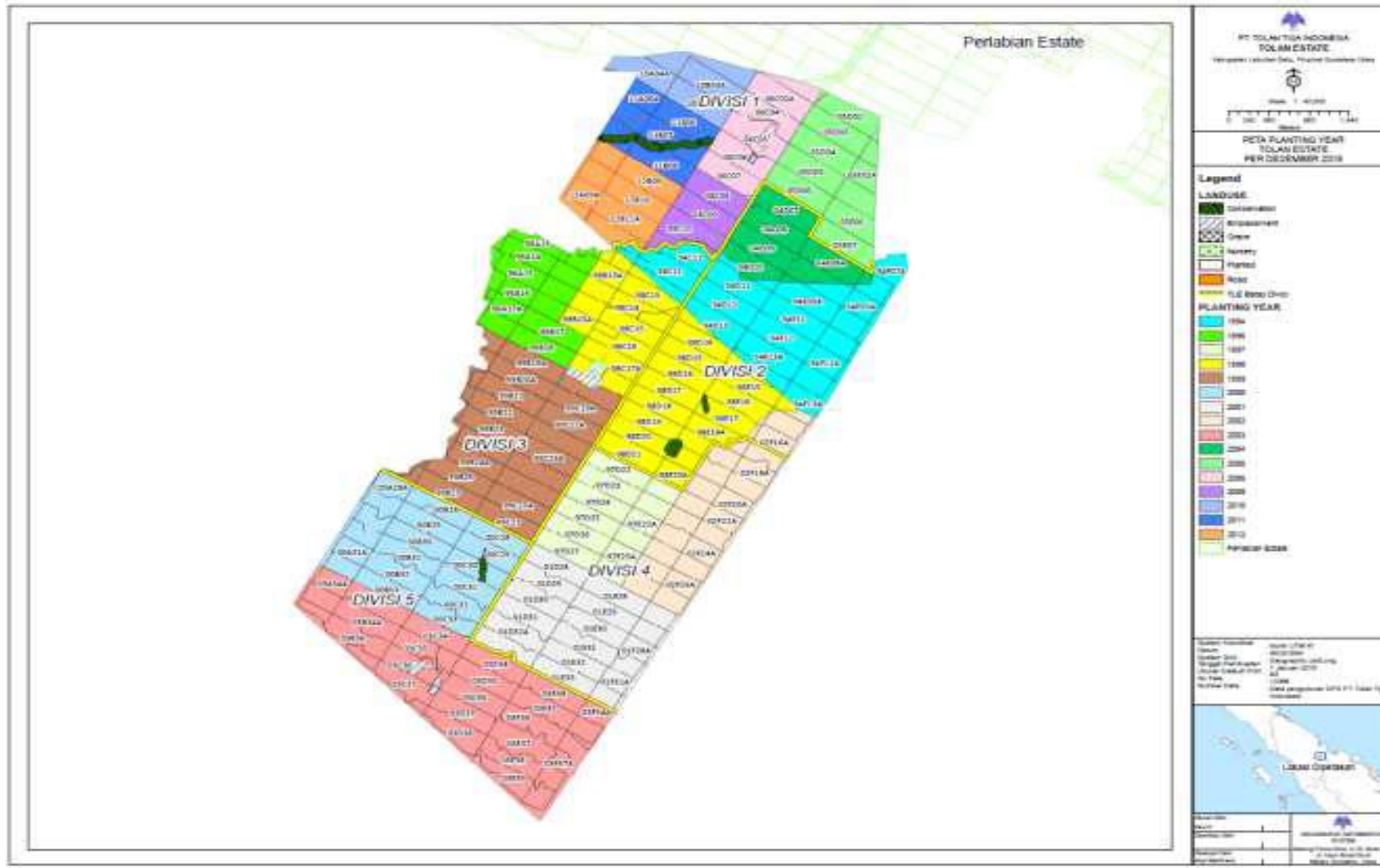
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**Appendix G: List of Smallholder Sampled**

Not Applicable (N/A)

## Appendix H: 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