

**RSPO PRINCIPLE AND CRITERIA**  
**PUBLIC SUMMARY REPORT** **Annual Surveillance Assessment (2\_1)**

<b>Client Company name (Parent Company):</b> <b>SIPEF Group</b>
Client company Address: <b><u>Kasteel Calesberg – Calesbergdreef 5</u></b> <b><u>B-2900 Schoten – Belgium</u></b>
Certification Unit: <b>PT. Eastern Sumatra Indonesia – Bukit Maradja Palm Oil Mill</b>
Location of Certification Unit: Nagori Marihat Bukit Village, Gunung Malela District, Simalungun Regency, Sumatera Utara Province, Indonesia
Date of Final Report: 08 June 2021

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

1. Company Details			
<b>Parent Company</b>	SIPEF Group		
<b>RSPO Membership Number</b>	1-0021-05-000-00	<b>Membership Approval Date</b>	7/12/2005
<b>Address</b>	Kasteel Calesberg – Calesbergdreef 5, B-2900 Schoten – Belgium		
<b>Palm Oil Mill / Group Manager / Estate (Certification Unit)</b>	PT. Eastern Sumatra Indonesia – Bukit Maradja POM		
<b>Location / Address</b>	Nagori Marihat Bukit Village, Gunung Malela District, Simalungun Regency, Sumatera Utara Province, Indonesia		
<b>Website</b>	<a href="http://www.tolantiga.co.id">www.tolantiga.co.id</a>		
<b>Management Representative</b>	Mr. Sander Van Den Ende	<b>E-mail</b>	<a href="mailto:svdenende@sipef.com">svdenende@sipef.com</a>
<b>Telephone</b>	+6261 - 41060020	<b>Facsimile</b>	+6261 - 4520908

2. Certification Information			
<b>Certificate Number</b>	<b>RSPO 632266</b>	<b>Date of First Certification</b>	17/05/2010
		<b>Certificate Start Date</b>	17/05/2020
		<b>Certificate Expiry Date</b>	16/05/2025
<b>Scope of Certification</b>	<p>Palm Oil and Palm Kernel Production.</p> <p>Production of CPO and PK at Bukit Maradja POM with 3 estates as supply bases, namely Bukit Maradja Estate (PT. Eastern Sumatra Indonesia), Kerasaan Estate (PT. Kerasaan Indonesia) and Timbang Deli Estate (PT. Timbang Deli Indonesia); with Marketing Activities through SIPEF N.V.</p> <p>Mill capacity of Bukit Maradja POM is 30 MT FFB/hour.</p>		
<b>Visit Objectives</b>	<p>The objective of the assessment was to conduct a surveillance assessment and look for positive evidence to ensure that elements of the scope of certification and the requirements of the requirements of Principles and Criteria For Sustainable Palm Oil Production 2018, The Indonesia National Interpretation, Endorsed by the RSPO Board of Governors on 20<sup>th</sup> April 2020.</p>		
<b>Assessment Cycle</b>	<input type="checkbox"/> Initial Assessment <input type="checkbox"/> Recertification Assessment (Choose an item.) <input checked="" type="checkbox"/> Annual Surveillance Assessment (RA 2 ; ASA 1) <input type="checkbox"/> Scope Extension		
<b>Applicable Standards</b>	<input type="checkbox"/> RSPO P&C 2018 for the Production of Sustainable Palm Oil <input checked="" type="checkbox"/> Indonesia National Interpretation 2020 for RSPO P&C 2018 for the Production of Sustainable Palm Oil <input type="checkbox"/> Group Certification 2016		

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	<input type="checkbox"/> RSPO Independent Smallholders Standard 2019
<b>Supply Chain Module</b>	<input checked="" type="checkbox"/> Identity Preserved <input type="checkbox"/> Mass Balance

### 3. Other Certifications

Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
BSI-ISPO 614348	ISPO	BSI	18/07/2021
ISO 9001 – 00053944-002	ISO 9001:2015	Lloyd's Register Indonesia	03/07/2021

### 4. Location(s) of Mill & Supply Bases

Name (Mill / Supply Base)	Location	GPS Coordinates	
		Latitude	Longitude
Bukit Maradja POM	Nagori Marihat Bukit Village, Gunung Malela District, Simalungun Regency, North Sumatera Province – Indonesia	3° 0' 44.26" N	99° 14' 8.06" E
Bukit Maradja Estate	Nagori Marihat Bukit Village, Gunung Malela District, Simalungun Regency, North Sumatera Province – Indonesia	3° 0' 04.03" N	99° 13' 24.9" E
Kerasaan Estate	Nagori Marihat Bukit Village, Gunung Malela District, Simalungun Regency, North Sumatera Province – Indonesia	3° 3' 51.00" N	99° 15' 53.53" E
Timbang Deli Estate	Timbang Deli Village, Galang District, Deli Serdang Regency, Sumatera Utara Province – Indonesia	3° 27' 20.97" N	98° 53' 58.47" E

### 5. Description of Supply Base

Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Bukit Maradja Estate	3,034.58	97.71	45.65	3,177.94	95.49
Kerasaan Estate	2,316.65	26.42	18.96	2,362.03	98.08
Timbang Deli Estate	236.23	13.53	722.43	972.19	24.30
<b>Total</b>	<b>5,587.46</b>	<b>137.66</b>	<b>787.04</b>	<b>6,512.16</b>	<b>85.80</b>

**Note:**

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6. Plantings & Cycle							
Estate	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Bukit Maradja Estate	387.56	902.29	942.87	741.86	60	2,647.02	387.56
Kerasaan Estate	-	1,024.59	655.2	636.86		2,316.65	
Timbang Deli Estate	166.32	69.91				69.91	166.32
<b>Total (ha)</b>	<b>553.88</b>	<b>1,996.79</b>	<b>1,598.07</b>	<b>1,378.72</b>	<b>60</b>	<b>5,033.58</b>	<b>553.88</b>

7. Certified Tonnage of FFB (Own Certified Scope)				
Estate	Tonnage / year			
	Estimated (May 2020 – April 2021)	Actual (Mar 2020 – February 2021)		Forecast (May 2021 – April 2022)
		Previous license period (Mar 2020 – Apr 2020)	Current license period (May 2020 – Feb 2021)	
Bukit Maradja Estate	63,628	11,465.85	51,901.89	70,825
Kerasaan Estate	55,048	9,536.51	43,168.48	61,524
Timbang Deli Estate	3,149	511.53	2,315.51	2,982
<b>Total</b>	<b>121,825</b>	<b>118,899.77</b>		<b>135,331</b>

8. Certified Tonnage of FFB (from other certified unit(s))				
Estate	Tonnage / year			
	Estimated (May 2020 – April 2021)	Actual (Mar 2020 – February 2021)		Forecast (May 2021 – April 2022)
		Previous license period (Mar 2020 – Apr 2020)	Current license period (May 2020 – Feb 2021)	
	N/A			N/A
<b>Nil</b>		-	-	
<b>Total</b>		-		

9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Independent FFB Supplier	Tonnage / year			
	Estimated (May 2020 – April 2021)	Actual (Mar 2020 – February 2021)		Forecast (May 2021 – April 2022)
		Previous license period (Mar 2020 – Apr 2020)	Current license period (May 2020 – Feb 2021)	
<b>Nil</b>	-	-	-	-

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<b>Total</b>	-	-	-
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<b>10. Certified Tonnage</b>				
<b>Mill Capacity: 30 MT/hr</b>	<b>Estimated (May 2020 – April 2021)</b>	<b>Actual (Mar 2020 – February 2021)</b>		<b>Forecast (May 2021 – April 2022)</b>
	<b>FFB</b>	<b>FFB</b>		<b>FFB</b>
	121,825	<i>Previous license period (Mar 2020 – Apr 2020)</i>	<i>Current license period (May 2020 – Feb 2021)</i>	135,331
		31,370.01	87,529.76	
		118,899.77		
	<b>CPO (OER: 23.70 %)</b>	<b>CPO (OER: 23.27%)</b>		<b>CPO (OER: 24%)</b>
	28,872	7,329.63	20,341.79	32,479.44
		27,671.42		
	<b>PK (KER: 5.00 %)</b>	<b>PK (KER: 4.87%)</b>		<b>PK (KER: 5.5%)</b>
6,091	1,496.16	4,299.50	7,443.21	
<b>TOTAL</b>	<b>N/A</b>	5,795.66		<b>N/A</b>

<b>11. Actual Sold Volume (CPO)</b>					
<b>Current License period (May 2020 – Feb 2021)</b>					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
<b>CPO (MT)</b>	-	20,997.96	-	-	20,997.96
<b>Previous License period (Mar 2020 – Apr 2020)</b>					
<b>CPO (MT)</b>	-	3,655.38	-	-	3,655.38
<b>Total</b>	-	24,653.34			24,653.34
Note: CPO sold 656.17 MT was carry over from previous license. This volume was produced on March 2021 from 2,853 MT FFB.					

<b>12. Actual Sold Volume (PK)</b>					
<b>Current License period (May 2020 – Feb 2021)</b>					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
<b>PK (MT)</b>	4,293.38	-	-	-	4,293.48
<b>Previous License period (Mar 2020 – Apr 2020)</b>					

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<b>PK (MT)</b>	433.36	-	-	-	433.36
<b>Total</b>	4,726.74	-	-	-	4,726.74
<b>13. Independent Smallholders Certification Claims</b>					
		<b>Credit</b>		<b>Physical Volume (MT)</b>	
<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.  
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Representative: Nicholas Cheong ([Nicholas.Cheong@bsigroup.com](mailto:Nicholas.Cheong@bsigroup.com))  
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BSI is a leading global provider of management systems assessment and certification, with more than 84,000 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.

### 2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on 12-17 March 2021. The audit programme is included as Section 2.3.

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

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. RSPO Principles & Criteria 2018 for the Production of Sustainable Palm Oil (The Indonesia National Interpretation, Endorsed by the RSPO Board of Governors on 20<sup>th</sup> April 2020) was used to guide the assessment 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 (and 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 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

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of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Section 3.5.

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

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

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

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

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

<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>
Bukit Maradja POM	V	V	V	V	V
Bukit Maradja Estate	V	V	V	V	V
Kerasaan Estate	V	V	V	V	V
Timbang Deli Estate					

**Tentative Date of Next Visit: March 14, 2022 – March 17, 2022**

**Total No. of Mandays: 15**

**2.2 BSI Assessment Team:**

<b>Team Member Name</b>	<b>Role</b> <i>(Team Leader or Team member)</i>	<b>Qualifications</b>
Yudwi Wisnu Rahmanto (YW)	Team Leader	Holds a Bachelor of Forestry with Silviculture. He has 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,

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		he assessed on the aspects of OHS, GHG, HCV identification and management.
Eko Purwanto (EP)	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.
Pratama Agung Sedayu (PS)	Team Member	Holds a degree majoring in Social Economic of Agriculture from University of Jenderal Soedirman. He involved in RSPO certification since 2009 as a team member subsequently as a Lead Auditor, covering assessment against RSPO P&C in Indonesia, Malaysia, Thailand, Papua New Guinea, and Liberia. He completed the ISO 9001, ISO 14001, OHSAS 18001 Lead Auditor Course, HCV Identification and Management; ISPO Lead Auditor endorsed Course and RSPO P&C and RSPO SCCS Lead Auditor endorsed Courses. During this assessment, he assessed on the aspects of legal, supply chain for CPO Mills, environment management system, HCV, smallholder audits and stakeholder consultation. He is using Bahasa Indonesia. During this assessment, he assessed on the aspects of social, worker welfare, contractor/supplier compliance.
Nanang Mualib (NM)	Team Member	Holds a Bachelor degree in Forestry Technology from Bogor Agriculture University. He has 4 years working experience in Forest plantation company in Indonesia, and has experiences involve in the several RSPO certification audits as team member. He has passed 5 days ISO 9001 auditor training on 2009. He has been approved as an HCV Assessor under RSPO Scheme. He has been involved in many assessment related to the Forestry and Sustainable oil palm certification in Indonesia. He has experienced involves in RSPO certification assessments more than 15 different oil palm organizations (including mills and estates) in Indonesia. He has passed the RSPO Lead Auditor Training in 2017. During this assessment, he assessed on the aspect of legal and land ownership.

**Accompanying Persons:**

Name	Role

**2.3 Assessment Plan**

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

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Date	Time	Subjects	YWR	EP	PS	NM
Friday, 12/03/2021	06.30	- Travelling from Perlabian to Bukit Maradja	√	√	√	√
	14.00 – 15.00	Opening Meeting - Presentation by client (Overview of PT. Eastern Sumatra Indonesia – Bukit Maradja POM and its supply bases); - Presentation by BSI team (Objective, scope, audit plan, etc.)	√	√	√	√
	14.00 – 17.00	Field visit <b>Bukit Maradja POM</b> to verify: <ul style="list-style-type: none"> <li>• BMP for Mill Processing – site visit</li> <li>• Occupational Health &amp; Safety Aspect (Inspection to Chemical Storage, Hazardous Waste Storage, Fire Control Simulation, Processing Activities)</li> <li>• Implementation of Environmental and Waste Management Aspect (POME Pond, Empty Bunch Area, Reservoir/Intake Point, Biogas Plant – if any)</li> <li>• Supply Chain for CPO Mill (site visit) - FFB Receiving, Weighbridge, Dispatch CPO.</li> </ul> Stakeholder consultation (local community/villagers), gender committee, worker union. Stakeholder consultation to relevant agencies of Simalungun Regency (by phone)	√	√	√	√
Saturday, 13/03/2021	08.00 – 12.00	Field Visit <b>Bukit Maradja Estate</b> to verify: <ul style="list-style-type: none"> <li>• Implementation of Agronomy Aspect</li> <li>• Implementation of Environmental, Conservation and Waste Management Aspect</li> <li>• Implementation of Occupational Health &amp; Safety Aspect</li> <li>• Implementation of Legal Aspect and Land Rights</li> </ul>	√	√	√	√
	12.01 – 14.00	Lunch break	√	√	√	√
	14.01 – 17.00	Document Review <b>Bukit Maradja Estate</b>	√	√	√	√
Sunday 14/03/2021		Audit off	√	√	√	√
Monday 15/03/2021	08.00 – 12.00	Field visit <b>Kerasaan Estate</b> to verify: <ul style="list-style-type: none"> <li>• Implementation of Agronomy Aspect</li> <li>• Implementation of Environmental, Conservation and Waste Management Aspect</li> <li>• Implementation of Occupational Health &amp; Safety Aspect</li> <li>• Implementation of Legal Aspect and Land Rights</li> </ul>				
	12.01 – 14.00	Lunch break				

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	14.01 – 17.00	Document Review <b>Kerasaan Estate</b> (continued)				
Tuesday 16/03/2021	08.00 – 12.00	Document Review <b>Bukit Maradja POM</b> Supply chain verification (continued)	√	√	√	√
	12.01 – 14.00	Lunch break	√	√	√	√
	14.01 –	Travelling to <b>Timbang Deli Estate</b>	√	√	√	√
Wednesday 17/03/2021	08.00 – 12.00	Field visit <b>Timbang Deli Estate</b> to verify: <ul style="list-style-type: none"> <li>• Implementation of Agronomy Aspect</li> <li>• Implementation of Environmental, Conservation and Waste Management Aspect</li> <li>• Implementation of Occupational Health &amp; Safety Aspect</li> <li>• Implementation of Legal Aspect and Land Rights</li> </ul> Stakeholder consultation (local community/villagers), gender committee, worker union.	√	√	√	√
	12.01 – 14.00	Lunch break				
	14.01 – 16.00	Document Review Timbang Deli Estate	√	√	√	√
	16.01 – 16.30	Closing meeting preparation	√	√	√	√
	16.31 – 17.00	Closing Meeting	√	√	√	√
Thursday 18/03/2021	11.15 -	Flight Kualanamu - Jakarta	√	√	√	√

### Section 3: Assessment Findings

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

- SIPEF Group Multiple Management Units / Time Bound Plan
- RSPO Principle and Criteria (P&C) 2018 for the Production of Sustainable Palm Oil
- RSPO Group Certification Standard 2016
- Indonesia National Interpretation 2020 for RSPO P&C 2018
- Independent Smallholder Standard 2019

#### 3.2 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the plan include all current subsidiaries, estates and mills that is under the control of the holding company?	PT. Eastern Sumatera Indonesia – Bukit Maradja POM 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?	<p>No. Not all the estates and mills certified within five years after obtaining RSPO membership. New estates and mills are under progress to be RSPO certified after RSPO NPP carried out in 2014.</p> <p>As per approved Time-Bound Plan in Appendix B, some of uncertified management units will be start for certification process after obtaining land title/HGU.</p> <p>These non-certified POM and Estates are under:</p> <ul style="list-style-type: none"> <li>- PT. Agro Kati Lama with Kati Lama POM – NPP in 2014, but not yet obtaining HGU. A new NPP submitted in 2019 to cover new areas permitted at end of 2018. Certification to take place after obtaining HGU, planned for 2023.</li> <li>- PT. Agro Muara Rupit with Muara Rupit POM – NPP in 2014, but not yet obtaining HGU. Certification to take place after obtaining HGU, planned for 2023.</li> <li>- PT. Agro Rawas Ulu part of PT. Agro Muara Rupit, estate only – NPP in 2014. Certification to take place after obtaining HGU, planned for 2023.</li> <li>- PT Citra Sawit Mandiri (acquisition in 2008, Estate only, certification to take place after obtaining land title/HGU, planned for 2022)</li> </ul> <p>This is consistent with ACOP reporting 2019. Stated SIPEF group plan to achieve 100% RSPO certification for all estate and smallholder by 2029. The timebound plan (stating 2023) is consistent with ACOP reporting.</p>	Yes
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three-year from the date	The latest acquisition noted for PT. Asri Rimba Wirabhakti in Bengkulu Province, announced end of 2018. Certification plan have been prepared, awaiting for RSPO LUC, RSPO RACP and RSPO NPP.	Yes

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of acquisition. Certification plan for the new acquisition shall be available.		
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. This is consistent with ACOP reporting 2019. Stated SIPEF group plan to achieve 100% RSPO certification for all estate and smallholder by 2029. The timebound plan is 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 able to certify all the estate within the 5 years period from the day of RSPO membership due to pending HGU issuance for uncertified management unit. This is accepted by the assessment team.	Yes
<b>Un-Certified Units or Holdings</b>		
No replacement after dates defined in NIs Criterion 7.3: <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>	Assessment team checked to confirm any land conflict/liabilities on RaCP tracker and 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".	Yes
Any new plantings since January 1 <sup>st</sup> 2010 shall comply with the RSPO New Plantings Procedure.	All new planting after 1 January 2010 have undergone and complies with RSPO New Planting Procedure.	Yes
Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 2.2, 6.4, 7.5 and 7.6. <i>Note:</i>	The assessment team has conducted a search to RSPO Complaint Panel and RSPO Dispute Settlement Facility 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. 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. On 20 December 2018 – The complaint is officially closed. 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>	Yes
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3.	The assessment team has conducted a search to RSPO Complaint Panel and RSPO Dispute Settlement Facility to confirm that there is a lodged complaint related to casual worker payment and welfare, that was recorded as	Yes

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	<p>complaint under RSPO Case Tracker; raised by complainant requesting confidentiality, on those SIPEF Management Unit that have not been certified.</p> <p>RSPO Case Tracker recorded complaint to PT. Agro Kati Lama. The case tracker available on link <a href="https://askrspo.force.com/Complaints/case/5000o000039fi8kAAA/detail">https://askrspo.force.com/Complaints/case/5000o000039fi8kAAA/detail</a></p> <p>Date complaints submitted 22 January 2021. Date complaints accepted 5 March 2021. The complainant brought forward the issue of:</p> <ul style="list-style-type: none"> <li>-The daily casual workers are paid below the minimum wage set out by the Musi Rawas District Government;</li> <li>-The daily casual workers are not protected and no remedy available for work accidents;</li> <li>-The daily casual workers are not equipped with personal protection equipment [PPE] and are not equipped with working tools;</li> <li>-The daily casual workers did not receive festive allowance in accordance with the regulation;</li> <li>-The daily casual workers, who are hired through the third party, do not get a pay slip. The amount written in the payment receipt is without formal stamp and without the name of the party who rendered the payment.</li> </ul> <p>SIPEF correspond with RSPO Grievance Manager – Indonesia to follow up the complaint on 16 March 2021, 19 March 2021 with highlight that the complainant has decided to resolve the complaint through mediation by RSPO Dispute Settlement Forum/DSF.</p> <p>On 1 April 2021, SIPEF sent formal response to the complaint, addressed to RSPO Grievance Manager. There is no update in RSPO Case Tracker website as of 14 April 2021.</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>Yes</p>



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	<p>Each company provide correction and corrective action on the base to ensure all RSPO P&amp;C requirements are implemented.</p> <p>According to an internal audit report of uncertified management units, the positive assurance stated:</p> <ol style="list-style-type: none"> <li>1. Implementing RSPO P&amp;C and relevant requirements onsite even though this unit not yet certified.</li> <li>2. Will committed to entering certification process after the land title issued. This statement also stated into the TBP target for certification.</li> </ol>	
Have there been any stakeholder (including NGO) consultation conducted?	Yes. Stakeholder comments are noted. The assessment team has conducted a search in internet to confirm that there is a comment that was recorded as complaint under RSPO Dispute Settlement Facility – however, it was stated as confidential. Therefore audit team cannot contact the stakeholder with negative comment for un-certified management unit.	Yes

**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>	No. PT. Eastern Sumatera Indonesia – Bukit Maradja POM does not have smallholder or outgrowers as supply base.	Not applicable

**3.4 Details of Nonconformities**

The nonconformities are listed below. The findings summary of the assessment by criteria are listed in Appendix A.

During this Assessment there were no Critical; no Minor nonconformities and no Opportunity For Improvement raised. The PT Eastern Sumatra Indonesia - Bukit Maradja POM Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment. The implementation of the Corrective Actions for the Critical Nonconformity(ies) has been verified for it 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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		(Critical / Minor)	
Date Issued		Due Date	
Closed (Yes / No)		Date of nonconformity Closure	
Statement of Nonconformity:			
Requirement Reference:			
Objective Evidence:			
Corrections:			
Root Cause Analysis:			
Corrective Actions:			
Assessment Conclusion:			

Opportunity for Improvements	
OFI #	Description
OFI 1	Nil

Positive Findings	
PF #	Description
PF 1	Nil

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

Non-conformity			
NCR Ref #	Nil	Clause & Category (Critical / Minor)	
Closed (Yes / No)		Date of nonconformity Closure	
Statement of Nonconformity:			
Requirement Reference:			
Objective Evidence:			
Corrective Actions:			
Assessment Conclusion:			

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

**3.4.2 Summary of the Nonconformities and Status**

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1033270M1	Major	RSPO P&C 2.1.1	03/03/2014	Closed on 13/05/2014
1033270M2	Major	RSPO P&C 5.3.2	03/03/2014	Closed on 13/05/2014
1033270M3	Major	RSPO P&C 5.6.2	03/03/2014	Closed on 13/05/2014
1033270N1	Minor	RSPO P&C 2.1.4	03/03/2014	Closed on 28/03/2015
1033270N2	Minor	RSPO P&C 4.7.4	03/03/2014	Closed on 28/03/2015
1033270N3	Minor	RSPO P&C 4.7.5	03/03/2014	Closed on 28/03/2015
1033270N4	Minor	RSPO P&C 4.7.5	03/03/2014	Closed on 28/03/2015
1170504M1	Major	RSPO P&C 6.3.1	28/03/2015	Closed on 22/04/2015
1170504M2	Major	RSPO Supply Chain Certification Standard (November 2014) – clause D.3.1	28/03/2015	Closed on 22/04/2015
1170504N1	Minor	RSPO P&C 2.2.5	28/03/2015	Closed on 18/03/2016
1170504N2	Minor	RSPO P&C 5.3.3	28/03/2015	Closed on 18/03/2016
1170504N3	Minor	RSPO P&C 6.1.4	28/03/2015	Closed on 18/03/2016
1170504N4	Minor	RSPO P&C 6.9.3	28/03/2015	Closed on 18/03/2016
1607838-201803-M1	Major	RSPO Supply Chain Certification Standard (June 2017) – clause D.4.2	24/03/2018	Closed on 16/04/2018
1754045-201903-M1	Major	RSPO Supply Chain Certification Standard (June 2017) General Chain of Custody Requirement- Clause 5.7.2	23/03/2019	Closed on 03/05/2019

**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. Eastern Sumatera Indonesia – Bukit Maradja POM Certification Unit’s environmental and social performance, legal and any known dispute issues.

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

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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> <ul style="list-style-type: none"> <li>- Gender Committee Timbang Deli Estate</li> <li>- Plantation and Mill workers: Boundary Poles Monitoring Officer, Harvesters, Sprayers, Children Day care Attendant, Contract Workers</li> </ul>	<p><b>Union/Contractors</b></p> <ul style="list-style-type: none"> <li>- Serikat Pekerja Bukit Maradja Mandiri (SP-BUMM)</li> <li>- Serikat Pekerja Kerasaan Indonesia Mandiri /SPKIM</li> <li>- Local Contractor PT Multi Prima Nusa and UD Sumber Teknik</li> <li>- Local Contractor UD Rizki Sejahtera</li> </ul>
<p><b>Government Departments</b></p> <ul style="list-style-type: none"> <li>- Dinas Pertanian Kabupaten Simalungun (Agriculture Service Simalungun Regency) – by phone</li> <li>- Dinas Lingkungan Hidup Kabupaten Simalungun (Environmental Service Simalungun Regency) – by phone</li> <li>- Dinas Ketenagakerjaan Kabupaten Simalungun (Manpower Service Simalungun Regency) – by phone</li> <li>- Kantor Pertanahan Kabupaten Simalungun (Land Service Simalungun Regency) – by phone</li> <li>- Village Head of Timbang Deli and Kramat Gajah.</li> <li>- Village Head of Nagori Pematang Sakhuda Dan Pematang Asilom</li> <li>- Village Head of Kerasaan I and Nagori Pardomoan Nauli</li> </ul>	<p><b>NGO</b></p> <ul style="list-style-type: none"> <li>- LSM Suara Inti (Village of Kerasaan I) – contacted by phone but no response.</li> </ul>

<b>Stakeholders comment</b>	
<b>1</b>	<p><b>Feedbacks:</b></p> <p>Dinas Pertanian Kabupaten Simalungun (Agriculture Service Simalungun Regency)</p> <ol style="list-style-type: none"> <li>a. PT Eastern Sumatera Indonesia (PT ESI) and PT Kerasaan Indonesia (PT KI) has been managing oil palm plantations since the Dutch colonial period in the area which is now its HGU.</li> <li>b. PT ESI and PT KI HGU without going through a Location Permit process because it is a transfer of western rights.</li> <li>c. PT ESI and PT KI HGU is not in a forest area function.</li> <li>d. HGU is in accordance with the layout of the province as a plantation cultivation area.</li> <li>e. Social activities to the community are going well.</li> <li>f. There is no information related to the planned community plantation facilitation program by PT ESI and PT KI.</li> <li>g. No land conflicts go to the Plantation Service</li> <li>h. PT ESI and PT KI has sent regular reports such as LPUP, Mill Production Reports, Land Fire Reports and RKL-RPL Reports in an orderly manner.</li> </ol>

	<p><b>Management Responses:</b></p> <ul style="list-style-type: none"> <li>- PT Eastern Sumatera Indonesia and PT Kerasaan Indonesia management appreciates comments from Agriculture Services, as positive inputs.</li> <li>- Company regularly reports the production data, plantation business report, fire and fire prevention report, environmental management and monitoring report to Plantation Service.</li> </ul> <p><b>Audit Team Findings:</b></p> <ul style="list-style-type: none"> <li>- Audit team accepts the comments from Agriculture Services as positive comments.</li> <li>- Audit team accepts response and explanation from PT. Eastern Sumatera Indonesia PT Kerasaan Indonesia.</li> </ul>
<p><b>2</b></p>	<p><b>Feedbacks:</b>  Dinas Lingkungan Hidup Kabupaten Simalungun (Environmental Service Simalungun Regency)</p> <ol style="list-style-type: none"> <li>a. PT ESI and PT KI has been managing oil palm plantations since the Dutch colonial period in the area which is now its HGU.</li> <li>b. PT ESI and PT KI has completed permits related to environmental management such as environmental permits, permits for temporary storage of hazardous waste (TPS LB3) etc.</li> <li>c. The 2020 period is the best year in terms of environmental management, establishes good communication, responds well if there is direction from the Environmental Service.</li> <li>d. The administrative sanctions have been lifted by the Ministry of Environment and Forestry.</li> <li>e. PT ESI and PT KI has submitted regular and timely reports related to environmental management.</li> <li>f. There are no lab test results on environmental quality that do not comply with the permitted quality standards.</li> <li>g. PT ESI and PT KI HGU is not within the function of the Forest Zone.</li> <li>h. There is no issue related to PT ESI and PT KI HGU with a provincial layout.</li> <li>i. Social activities to the community are going well.</li> <li>j. There were no incidents of land fires in the PT ESI concession area.</li> <li>k. PT ESI and PT KI already has land fire emergency response procedures and land fire fighting infrastructure.</li> <li>l. No land conflicts go to the Environmental Service.</li> <li>m. There is no environmental pollution issue caused by PT ESI and PT KI 's operations that are included in the Environmental Service.</li> <li>n. There are no peat areas within the PT ESI and PT KI concession.</li> </ol> <p><b>Management Responses:</b></p> <ul style="list-style-type: none"> <li>- PT ESI and PT KI management appreciates comments from Environmental Services, majority as positive inputs.</li> <li>- There is no peat soil in area of PT ESI and PT KI.</li> <li>- PT ESI and PT KI committed to meet all environmental parameter.</li> <li>- Company regularly reports the environmental management performance to Environmental Service.</li> </ul> <p><b>Audit Team Findings:</b></p> <ul style="list-style-type: none"> <li>- Audit team accepts the comments from Environmental Services as positive comments.</li> <li>- Audit team accepts response and explanation from PT ESI and PT KI.</li> <li>- Audit team report chronology related to environmental performance under indicator 3.4.1, 7.3.1, 7.4.3.</li> </ul>
<p><b>3</b></p>	<p><b>Feedbacks:</b>  Dinas Ketenagakerjaan Kabupaten Simalungun (Manpower Service Simalungun Regency)</p> <ol style="list-style-type: none"> <li>a. The company does not obstruct the existence of a labor union and supports the existence of a trade</li> </ol>

	<p>union.</p> <p>b. PT ESI already has a PKB which at this time has ended but it has been agreed to extend it for the next 1 year (Negotiations on the preparation of a new PKB are hampered by the conditions of the COVID-19 Pandemic).</p> <p>c. The Workers Union has been involved in the preparation of the CLA, while in the process of extension, approval is requested.</p> <p>d. Bipartite and P2K3 LKS have been formed at PT ESI.</p> <p>e. There is no impact of the COVID-19 Pandemic on Termination of Employment (PHK).</p> <p>f. The relationship between PT ESI and the Workers Union is going well and smoothly.</p> <p>g. There are no issues related to the basic wage for PKWT / SKU employees who have followed the Simalungun UMK regulations in 2021.</p> <p>h. During the 2020 period there were no industrial relations disputes at PT ESI.</p> <p>i. LKS Bipartite has been formed, has been registered with the Manpower Office. Routine reports are sent to the Office.</p> <p>j. There is no issue of discrimination by the company</p> <p>k. There are no workers 'complaints that have entered in the past year related to workers' rights.</p> <p>l. There is no issue of underage workers</p> <p>m. PT ESI has provided PPE, first aid kit, APAR etc. for employees according to their needs.</p> <p>n. All workers have been included in the BPJS-Kes and BPJS-TK programs.</p> <p>o. P2K3 has been established but its reporting is currently under the authority of the Provincial Manpower Supervisor.</p> <p>p. The Regency Manpower Office receives a copy of the work accident report.</p>
	<p><b>Management Responses:</b></p> <ul style="list-style-type: none"> <li>- PT Eastern Sumatra Indonesia and PT Kerasaan Indonesia has policy for freedom of association and company acknowledge roles from worker union to represent employees in creating conducive work place.</li> <li>- PT Eastern Sumatra Indonesia and PT Kerasaan Indonesia has Collective Bargaining Agreement (CBA).</li> <li>- Salary payment year 2021 meets the regulation.</li> <li>- Company responded the applicable pay rate for daily worker meets the minimum wage year 2021.</li> <li>- Company responded the daily worker covered with BPJS Kesehatan and BPJS Ketenagakerjaan; company ensure female worker covered under spouse's registration.</li> <li>- Company regularly reports the manpower data, industrial data, health and safety management performance to Manpower Service.</li> </ul>
	<p><b>Audit Team Findings:</b></p> <ul style="list-style-type: none"> <li>- Audit team accepts response and explanation from PT Eastern Sumatra Indonesia and PT Kerasaan Indonesia.</li> <li>- Audit team report worker welfare under indicator 2.2.2, 6.2.6, 6.2.7, 6.3.1, 6.4.1, 6.6.2.</li> </ul>
<p><b>4</b></p>	<p><b>Feedbacks:</b></p> <p>Kantor Pertanahan Kabupaten Simalungun (Land Service Simalungun Regency)</p> <p>a. PT ESI has Land Rights in the form of Business Use Rights (HGU) which currently is in the HGU extension period which will end on December 31, 2023.</p> <p>b. PT ESI's HGU is not within the function of the Forest Zone.</p> <p>c. There is no issue related to PT ESI's HGU with a provincial layout.</p> <p>d. There is no information related to the request for HGU renewal by PT ESI, but this is still possible because in accordance with existing regulations, applications for HGU extension / renewal are made no later than 2 years before the HGU validity period ends.</p> <p>e. The company is very cooperative with the Land Office when asked to indicate the position of the HGU</p>

	<p>area boundaries.</p> <p>f. During the 2018 - 2020 period, there were no reports of land disputes in the PT ESI concession area by other parties, including the surrounding community.</p> <p>g. There was an identification of abandoned land at PT ESI about 3 years ago which stated that "there is no indication of abandoned land in PT ESI's HGU".</p> <p>h. PT KI has Land Rights in the form of Business Use Rights (HGU), which is currently in the HGU extension period which will end on December 31, 2023.</p> <p>i. PT KI's HGU is not within the function of a forest area.</p> <p>j. There is no issue related to PT KI's HGU with a provincial layout.</p> <p>k. There is no information regarding the request for HGU renewal by PT KI, but this is still possible because in accordance with existing regulations, applications for HGU extension / renewal are made no later than 2 years before the HGU validity period ends.</p> <p>l. The company is very cooperative with the Land Office when asked to indicate the position of the HGU area boundaries.</p> <p>m. During the 2018 - 2020 period, there were no reports of land disputes in the PT KI concession area by other parties, including the surrounding community.</p> <p>n. There was an identification of abandoned land at PT KI about 3 years ago which stated that "there is no indication of abandoned land in PT KI's HGU".</p> <p><b>Management Responses:</b></p> <ul style="list-style-type: none"> <li>- PT Eastern Sumatra Indonesia and PT Kerasaan Indonesia always strive to comply with regulations, especially the HGU renewal process.</li> <li>- PT ESI and PT KI management appreciates comments from Land Services, majority as positive inputs.</li> </ul> <p><b>Audit Team Findings:</b></p> <ul style="list-style-type: none"> <li>- Audit team accepts the comments from land service as positive comments.</li> <li>- Audit team accepts response and explanation from PT Eastern Sumatra Indonesia and PT Kerasaan Indonesia.</li> </ul>
<p><b>5</b></p>	<p><b>Feedbacks:</b></p> <p>Serikat Pekerja Bukit Maradja Mandiri (SP-BUMM)</p> <p>a. The company does not obstruct the existence of a labor union and supports the existence of a trade union.</p> <p>b. PT ESI already has a PKB which at this time has been extended for the next 1 year.</p> <p>c. The Workers Union has been involved in the preparation of the CLA, while in the process of extension, approval is requested.</p> <p>d. Bipartite and P2K3 LKS have been formed at PT ESI.</p> <p>e. There is no impact of the COVID-19 Pandemic on Termination of Employment (PHK).</p> <p>f. Relations and communication between the Plantation Agricultural Workers Union and PT ESI are going well and smoothly.</p> <p>g. Management changes every 5 years and the current management is the committee for the period 2017 - 2022.</p> <p>h. The number of SP-BUMM members as of January 2021 is around 500 employees</p> <p>i. Routine meetings are usually held every 3 months but since the COVID-19 pandemic, meetings have only been held if conditions are very urgent.</p> <p>j. The basic wage has followed the Simalungun UMK regulations in 2021 plus Rp. 7,500, - / month for each grade.</p> <p>k. Employee appraisals are carried out every 6 months as one of the considerations for a grade increase.</p> <p>l. There is no issue of discrimination by the company</p> <p>m. There are no workers 'complaints that have entered in the past year related to workers' rights</p> <p>n. There is no issue of underage workers</p> <p>o. There is no issue of paying below the minimum wage.</p>

	<p>p. PT ESI has provided PPE, first aid kit, APAR etc. for employees according to their needs.  q. All workers have been included in the BPJS-Kes and BPJS-TK programs.  r. Meeting the basic needs of employees can be accessed through the Employee Cooperative.</p> <p><b>Management Responses:</b></p> <ul style="list-style-type: none"> <li>- Salary payment year 2021 meets the regulation as per “Keputusan Gubernur Sumatera Utara No. 188.44/578/KPTS/2020 Tentang Penetapan Upah Minimum Kabupaten Simalungun Tahun 2021”.</li> <li>- PT. Eastern Sumatera Indonesia management confirms the statement from worker union, as positive input.</li> </ul> <p><b>Audit Team Findings:</b></p> <ul style="list-style-type: none"> <li>- Audit team accepts the comments from worker union as positive comments.</li> <li>- Audit team accepts response and explanation from PT. Eastern Sumatera Indonesia.</li> <li>- Worker union input and management response reported under indicator 2.2.2, 6.2.6, 6.2.7, 6.3.1, 6.4.1, 6.6.2.</li> </ul>
<p><b>6</b></p>	<p><b>Feedbacks:</b>  Village Head of Kerasaan I and Nagori Pardomoan Nauli.</p> <ol style="list-style-type: none"> <li>a. PT Kerasaan Indonesia is a company that has been operating since the Dutch era.</li> <li>b. Communication with the company went well.</li> <li>c. The community has understood the boundaries of PT Kerasaan Indonesia's HGU in the form of a blue peg.</li> <li>d. There are no cases of land disputes between the community and PT Kerasaan Indonesia.</li> <li>e. There has been communication related to Community Garden Facilitation, data collection for partnership gardens in Kerasaan I and Nagori Pardomoan Nauli Villages.</li> <li>f. If there is a job vacancy at PT Kerasaan Indonesia it has been submitted to the Nagori government but it is requested that the time for providing information is not too tight.</li> <li>g. The company's social assistance activities to the community include: assistance for borrowing heavy equipment to repair public facilities in Nagori, assistance to prevent the spread of COVID-19, “solid” assistance, JJK, boiler ashes for the community, Ramadhan Packages for mosques / prayer rooms, Eid / Christmas packages / New year etc. However, what helps the nagori government the most is that PT Kerasaan Indonesia provides access to use the grass in the HGU area which is very much needed by the cattle and goat breeders around it.</li> <li>h. Many national holiday celebrations were eliminated during the COVID-19 pandemic (March 2020 - present).</li> <li>i. The relationship between the Nagori community and PT Kerasaan Indonesia is going well, if there is a request for help from the community, the company responds quickly.</li> </ol> <p><b>Management Responses:</b></p> <ul style="list-style-type: none"> <li>- Management will keep good relationship with communities.</li> <li>- Management will continue check the boundary poles, ensure all in good condition.</li> <li>- Management has not received report about land conflict or environmental pollution.</li> <li>- Company is in partnership agreement with cooperative with smallholder member. Cooperative will sell the FFB from partnering smallholder to company. Smallholder member under “Petani Sawit Rakyat/PSR” program is waiting fund from BPDPKS to be utilized for replanting. Company does not provide oil palm seedling. To meet quality standard, company will provides guidance.</li> <li>- Company committed to follow government advice to mitigate COVID-19 spread including prevent crowd-gathering.</li> <li>- Company has provided explanation the road is fall under company land title/HGU and cannot be excised out. Company always allow community to use the road.</li> </ul>



	<p><b>Audit Team Findings:</b></p> <ul style="list-style-type: none"> <li>- Audit team accepts the comments from communities as positive comments.</li> <li>- Audit team accepts response and explanation from PT. Kerasaan Indonesia related to community development. Stakeholder comment and company response reported under indicator 4.3.1.</li> </ul>
<p><b>7</b></p>	<p><b>Feedbacks:</b>  SERIKAT PEKERJA KERASAAN INDONESIA MANDIRI /SPKIM (KETUA)</p> <ol style="list-style-type: none"> <li>a. The company does not obstruct the existence of a labor union and supports the existence of a trade union.</li> <li>b. PT KI already has a PKB which at this time has been extended for the next 1 year.</li> <li>c. The Workers Union has been involved in the preparation of the CLA, while in the process of extension, approval is requested.</li> <li>d. Bipartite and P2K3 LKS have been formed at PT KI.</li> <li>e. There is no impact of the COVID-19 Pandemic on Termination of Employment (PHK).</li> <li>f. Relations and communication between the Plantation Farm Workers Union and PT KI are running well and smoothly.</li> <li>g. Management changes every 5 years but in 2021 an Extraordinary Meeting is held to elect a new board.</li> <li>h. The number of SPKIM members as of January 2021 is around 500 employees</li> <li>i. The basic wage has followed the Simalungun UMK regulations in 2021 plus Rp. 7500, - / month for each grade.</li> <li>j. Employee appraisals are carried out every 6 months as one of the considerations for a grade increase.</li> <li>k. There is no issue of discrimination by the company</li> <li>l. There are no workers 'complaints that have entered in the past year related to workers' rights</li> <li>m. There is no issue of underage workers</li> <li>n. There is no issue of paying below the minimum wage. <ol style="list-style-type: none"> <li>i. PT Kerasa Indonesia has provided PPE, first aid kit, APAR, etc. for employees according to their needs.</li> </ol> </li> <li>o. All workers have been included in the BPJS-Kes and BPJS-TK programs.</li> <li>p. Meeting the basic needs of employees can be accessed through the Employee Cooperative</li> </ol> <p><b>Management Responses:</b>  PT. Kerasaan Indonesia management confirms the statement from worker union, as positive input.</p> <p><b>Audit Team Findings:</b></p> <ul style="list-style-type: none"> <li>- Audit team accepts the comments from worker union as positive comments.</li> <li>- Audit team accepts response and explanation from PT. Eastern Sumatera Indonesia. Worker union input and management response reported under indicator 2.2.2, 6.2.6, 6.2.7, 6.3.1, 6.4.1, 6.6.2.</li> </ul>
<p><b>8</b></p>	<p><b>Feedbacks:</b>  Local Contractor PT Multi Prima Nusa and UD Sumber Teknik</p> <ol style="list-style-type: none"> <li>a. Requirements to become partners: Legality (Deed of establishment, NPWP, SIUP, TDP etc.)</li> <li>b. There is a work contract for each type of work which is renewed every year for the type of routine work (transporting FFB) or specific work SPK for incidental types of work, mutually agreed upon and signed on a stamp duty and one file is kept by each party.</li> <li>c. PPE for contractor workers is borne by local contractors including BPJS-TK, BPJS-Kes and Pajak.</li> <li>d. Payment has proceeded smoothly in accordance with the clauses in the work agreement.</li> <li>e. Already understand the mechanism for submitting complaints and other company policies related to sustainability.</li> <li>f. No complaints to the company.</li> <li>g. The company is performing well in terms of both payment and plantation management.</li> </ol> <p><b>Management Responses:</b></p>

	<ul style="list-style-type: none"> <li>- Company provide opportunity for local contractor to carry out some works in the company.</li> <li>- All contractors performing work for company shall: have legal entity, shall abide to rules and regulation in conformance to scope of work, contractor selection through tender process, does not employ child worker/underage worker, does not employ trafficked worker, pays minimum wage to workers, implement health and safety management system, register all workers to BPJS Ketenagakerjaan and BPJS Kesehatan.</li> <li>- Before performing work, company provides policy socialization to contractor and its worker.</li> </ul> <p><b>Audit Team Findings:</b></p> <ul style="list-style-type: none"> <li>- Audit team accepts the comments from contractors as positive comments.</li> <li>- Audit team accepts response and explanation from PT. Kerasaan Indonesia related to contractor/supplier monitoring. Stakeholder comments reported under indicator 2.2.2.</li> </ul>
<p><b>9</b></p>	<p><b>Feedbacks:</b>  Village Head of Timbang Deli and Kramat Gajah.</p> <ol style="list-style-type: none"> <li>a. PT Timbang Deli Indonesia is a company that has been operating since the Dutch era.</li> <li>b. Communication with the company went well.</li> <li>c. Already understand the boundaries of HGU in the form of red pegs.</li> <li>d. There are no cases of land claims / disputes between the community and the company.</li> <li>e. There was a complaint from the community (Desa Timbang Deli) regarding a new regulation from the company that prohibits grazing of cattle within the company area. Most of the people living around the company are cattle breeders (approximately 100 heads). There has been mediation with the company but there is still a strong demand from the community for pastoral care. The company has a policy to provide access to take grass.</li> <li>f. There has been socialization related to the plan to collaborate in the development of community oil palm plantations.</li> <li>g. If there is a job vacancy at PT Timbang Deli Indonesia it has been submitted to the Village government.</li> <li>h. The company's social assistance activities to the community are in the form of: heavy equipment borrowing assistance to repair public facilities in the village, Eid al-Fitr packages, scholarships for high-achieving but underprivileged students.</li> <li>i. The relationship between the Nagori community and PT Timbang Deli Indonesia is going well, if there is a request for help from the community, the company responds quickly.</li> </ol> <p><b>Management Responses:</b></p> <ul style="list-style-type: none"> <li>- Management will keep good relationship with communities.</li> <li>- Management will continue check the boundary poles, ensure all in good condition.</li> <li>- Management has not received report about land conflict or environmental pollution.</li> <li>- Company committed to follow government advice to mitigate COVID-19 spread including prevent crowd-gathering.</li> </ul> <p><b>Audit Team Findings:</b></p> <ul style="list-style-type: none"> <li>- Audit team accepts the comments from communities as positive comments.</li> <li>- Audit team accepts response and explanation from PT. Timbang Deli Indonesia related to community development. Stakeholder comment and company response reported under indicator 4.3.1.</li> </ul>
<p><b>10</b></p>	<p><b>Feedbacks:</b>  Village Head of NAGORI PEMATANG SAHKUDA DAN PEMATANG ASILOM</p> <ol style="list-style-type: none"> <li>a. PT Eastern Sumatra Indonesia is a company that has been operating since the Dutch era.</li> <li>b. Communication with the company went well.</li> <li>c. Already understand the HGU boundaries in the form of blue pegs.</li> </ol>

	<p>d. There has been a land claim problem, the Marihat hill area (in 2018). Those who carried out the Pagaraja Group (Association of the Cultivators of Bukit Maraja), Once again Pagaraja in 2020, has been delegated to legal channels. The basis for the claim is that it was once a cultivator.</p> <p>e. There has been communication related to Community Garden Facilitation, data collection for partnership gardens but Nagori Syahkuda did not take the program because most of the community was not engaged in oil palm plantations but suggested that they be able to build UMKM stalls in the area adjacent to the Nagori Syahkuda office.</p> <p>f. Any vacancies at PT Eastern Sumatra Indonesia have been submitted to the Nagori government.</p> <p>g. The company's social assistance activities to the community include: assistance for borrowing heavy equipment to repair public facilities in Nagori, assistance to prevent the spread of COVID-19, "solid" assistance, JJK, boiler ashes for the community, Ramadhan Packages for mosques / prayer rooms, Eid / Christmas packages / New year etc. However, what helped the nagori government the most was nutritional assistance for children as a result of the pandemic, around 27 children were stunted, the number currently decreased from 8 children to 2 children left (in Nagori Pematang Sakhuda)</p> <p>h. Many national holiday celebrations were eliminated during the COVID-19 pandemic (March 2020 - present).</p> <p>i. The relationship between the Nagori community and PT Eastern Sumatra Indonesia is going well, if there is a request for help from the community, the company responds quickly.</p> <p><b>Management Responses:</b></p> <ul style="list-style-type: none"> <li>- Management will keep good relationship with communities.</li> <li>- Management will continue check the boundary poles, ensure all in good condition.</li> <li>- Management has not received report about land conflict or environmental pollution.</li> <li>- Company committed to follow government advice to mitigate COVID-19 spread including prevent crowd-gathering.</li> </ul> <p><b>Audit Team Findings:</b></p> <ul style="list-style-type: none"> <li>- Audit team accepts the comments from communities as positive comments.</li> <li>- Audit team accepts response and explanation from PT. Eastern Sumatra Indonesia related to community development. Stakeholder comment and company response reported under indicator 4.3.1.</li> </ul>
<p><b>11</b></p>	<p><b>Feedbacks:</b> Harvesters, Sprayers, Contract workers</p> <p>a. Company has implemented minimum wage in 2020, as in "Upah Minimum Sektoral Kabupaten" for salary payment standard. Company has asked worker union for meeting on minimum wage 2021;</p> <p>b. Company has registering all worker under "BPJS Ketenagakerjaan" and "BPJS Kesehatan" for insurance;</p> <p>c. Company has provided facility for the worker, housing with clean water and electricity, medical clinic, school bus, religious house, sport facility.</p> <p>d. Company provides the facility for the worker including clean water. Clean water tested by laboratory.</p> <p>e. There has been no case of industrial relation dispute between employees and company;</p> <p>f. Company has communicated the OHS plan; provided medical check up on annual basis; provided PPE for harvester and sprayers; provided working tool as appropriate; provided onsite first aid kit with mandors;</p> <p>g. Company has communicated the complaint and grievance settlement mechanism.</p> <p>h. Company has communicated the policy on protection of flora and fauna, as well as high conservation value area.</p> <p><b>Management Responses:</b></p>

	<ul style="list-style-type: none"> <li>- Management will keep good relationship with all internal stakeholders.</li> <li>- Management committed to fulfil all worker rights as regulation.</li> </ul> <p><b>Audit Team Findings:</b>          Audit team accepts comments from workers and response &amp; explanation from PT Eastern Sumatra Indonesia.</p>
<p><b>12</b></p>	<p><b>Feedbacks:</b>          Local Contractor UD Rizki Sejahtera</p> <ol style="list-style-type: none"> <li>a. Requirements to become partners: Legality (Deed of establishment, NPWP, SIUP, TDP etc.)</li> <li>b. There is a work contract for each type of work which is renewed every year for the type of routine work (transporting FFB) or specific work SPK for incidental types of work, mutually agreed upon and signed on a stamp duty and one file is kept by each party.</li> <li>c. PPE for contractor workers is borne by local contractors including BPJS-TK, BPJS-Kes and Pajak.</li> <li>d. Payment has proceeded smoothly in accordance with the clauses in the work agreement.</li> <li>e. Already understand the mechanism for submitting complaints and other company policies related to sustainability.</li> <li>f. No complaints to the company.</li> <li>g. The company is performing well in terms of both payment and plantation management.</li> </ol> <p><b>Management Responses:</b></p> <ul style="list-style-type: none"> <li>- Company provide opportunity for local contractor to carry out some works in the company.</li> <li>- All contractors performing work for company shall: have legal entity, shall abide to rules and regulation in conformance to scope of work, contractor selection through tender process, does not employ child worker/underage worker, does not employ trafficked worker, pays minimum wage to workers, implement health and safety management system, register all workers to BPJS Ketenagakerjaan and BPJS Kesehatan.</li> <li>- Before performing work, company provides policy socialization to contractor and its worker.</li> </ul> <p><b>Audit Team Findings:</b></p> <ul style="list-style-type: none"> <li>- Audit team accepts the comments from contractors as positive comments.</li> <li>- Audit team accepts response and explanation from PT. Kerasaan Indonesia related to contractor/supplier monitoring. Stakeholder comments reported under indicator 2.2.2.</li> </ul>
<p><b>13</b></p>	<p><b>Feedbacks:</b>          Gender Committee Timbang Deli Estate</p> <ol style="list-style-type: none"> <li>a. Already have a gender committee work program to improve women's performance, socialization / understanding of gender committees and protection of the rights of women workers.</li> <li>b. The company has policies to protect female workers, such as granting maternity leave rights, menstrual leave rights, providing places for breastfeeding / child nursing hours. Given time to breastfeed 2 times during working hours from 09.00-09.30, depending on the needs of the worker.</li> <li>c. An identification of the needs of female workers who have just given birth has been carried out through interviews / questionnaires.</li> <li>d. General health checks are carried out every 3 months period while General Check Ups are carried out once a year. On the doctor's recommendation in the 2020 period, a General Check-Up Health examination was not carried out due to the situation that was still in the epidemic of COVID-19.</li> <li>e. There are no cases of workers who are breastfeeding being employed at high risk stations (Sprayers / fertilizers).</li> </ol> <p><b>Management Responses:</b></p> <ul style="list-style-type: none"> <li>- Management will keep good relationship with all internal stakeholders.</li> </ul>


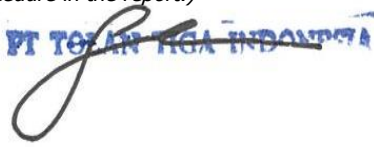
	- Management will continue good practices to protect reproductive rights.
	<b>Audit Team Findings:</b> - Audit team accepts the comments from gender committee as positive comments. - Audit team accepts response and explanation from PT. Timbang Deli Indonesia.
	<b>Feedbacks:</b> Local NGO - LSM Suara Inti (Village of Kerasaan I) – contacted by phone but no response.
	<b>Management Responses:</b> -
	<b>Audit Team Findings:</b> Auditor team already trying to contact the local NGO, unfortunately no response were received.

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
Nil					
Note: PT. Eastern Sumatera Indonesia – Bukit Maradja POM has been operated since the Dutch Colonial Era and there was no new land expansion after 2005. There is no previous land owner/user existed.					

### 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.

**Formal Signing-off of Assessment Conclusion and Recommendation**

<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. Eastern Sumatera Indonesia – Bukit Maradja POM has complied with the RSPO Principles and Criteria 2018 for Sustainable Palm Oil (The Indonesia National Interpretation, Endorsed by the RSPO Board of Governors on 20<sup>th</sup> April 2020) 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. Eastern Sumatera Indonesia – Bukit Maradja POM is continued.</p>	
Report prepared by	Acceptance of Assessment Conclusion
<p><b>Name:</b>  <b>Yudwi Wisnu Rahmanto</b></p>	<p><b>Name:</b>  <b>Sander Van Den Ende</b></p>
<p><b>Company Name:</b>  <b>On behalf BSI Services Malaysia Sdn Bhd</b></p>	<p><b>Company Name:</b>  <b>PT. Eastern Sumatera Indonesia – Bukit Maradja POM</b></p>
<p><b>Title:</b>  <b>Lead Auditor</b></p>	<p><b>Title:</b>  <b>Regional Director – Environment &amp; Conservation Department</b></p>
<p><b>Signature:</b></p> 	<p><b>Signature:</b>  <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i></p> 
<p><b>Date:</b>  <b>30 April 2021</b></p>	<p><b>Date:</b>  <b>30 April 2021</b></p>

**Appendix A: Summary of Findings**

Criterion / Indicator	Assessment Findings	Compliance	
<p><b>Principle 1: Behave ethically and transparently</b></p>			
<p>Drive ethical business behaviour, build trust and transparency with stakeholders to ensure strong and healthy relationships.</p>			
<p><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.</p>			
<p>1.1.1</p>	<p><b>(C)</b> Management documents that are specified in the RSPO P&amp;C are made publicly available.</p>	<p>Each estate and POM has consistently updated the types of documents that can be accessed by the public once a year, for example;</p> <ul style="list-style-type: none"> <li>a. Bukit Maradja POM has updated the types of documents that can be accessed by the public on February 18, 2021, which states that there are 19 types of documents that can be accessed by the public.</li> <li>b. Bukit Maradja Estate: has updated the types of documents that can be accessed by the public in March 2021 where the document states that there are 20 types of documents that can be accessed by the public.</li> <li>c. Kerasaaan Estate: has updated the types of documents that can be accessed by the public on February 8, 2021, which states that there are 19 types of documents that can be accessed by the public.</li> </ul> <p>Based on document verification, it shows that in the estate and POM offices there are documents available to the public including:</p> <ul style="list-style-type: none"> <li>a) A copy of the HGU Permit in the form of               <ul style="list-style-type: none"> <li>- Bukit Maradja Estate: license to extend Business Use Rights (HGU) for 25 years as stated in the Decree of the Head of the National Land Agency No. 108 / HGU / BPN / 97, dated 26 August 1997 concerning the Granting of Extension of Business Use Rights over Land located in Simalungun Regency, North Sumatra Province on</li> </ul> </li> </ul>	<p>Complied</p>

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		<p>behalf of PT Eastern Sumatra Indonesia. As a follow-up to the issuance of the HGU Extension Decree, the Simalungun Regency Land Office in 1997 issued a HGU Certificate No. 2 of 1997 which is located in Pematang Sakhuda Village dated 16 October 1997 with an area of 3,177.94 Ha in accordance with the Measure Letter No. 02.09.03.34.2.00348 / 1997 dated 16 October 1997. The expiration period for the extension of the HGU certificate is on 31 December 2023.</p> <ul style="list-style-type: none"> <li>- Kerasaaan Estate: Decree of the State Minister for Agrarian Affairs / Head of the Land Agency No.SK 90 / HGU / BPN / 97, dated August 5, 1997, with an area of 2,362.03 Ha, which is located in Kerasaan II Village, Bandar Rakyat District, Simalungun Regency, North Sumatra Province. Based on the decree, the HGU Certificate was issued by the Land Office of Simalungun Regency No. 01 dated 01 October 1997 with an area of 2,362.03 ha in accordance with the Measurement Letter No. 131/09 / IV / 97.</li> <li>- Timbang Deli Estate: Decree of the State Minister for Agrarian Affairs / Head of the Land Agency No. SK 69 / HGU / BPN / 97, dated July 10, 1997, with an area of 972.19 hectares, which is located in Timbang Deli Village, Galang District, Deli Serdang Regency, North Sumatra Province. Based on the decree, the HGU Certificate was issued by the Land Office of Deli Serdang Regency No. 04 dated September 10, 1997 with an area of 972.19 ha in accordance with the Situation Figure No. 8860/1997 dated 9 September 1997.</li> </ul> <p>b) Occupational Health and Safety, Environment and Social Management Committee Program (P2K3LHS) for each estate and POM.</p> <p>c) Environmental Documents (AMDAL), Report documents on the implementation of RKL-RPL,</p>	
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		<p>d) HCV Identification Document, HCV Management and Monitoring Plan, HCV Report.</p> <p>e) Documents of complaints received from stakeholders and company responses to these complaints.</p> <p>f) Procedure for providing and responding to requests for information.</p> <p>There are 24 types of set of procedures, for example; Procedures for Legal and Corporate Affairs Department Manual, Environment and Conservation Department Manual, Estate Department Manual, Palm Oil Mill Operational Manual, Internal Audit Department Manual, Occupational Health and Safety Operational Manual, Laboratory independent Operational Manual, Purchasing Department Manual, Engineering Department Manual etc.</p>	
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders.	<p>Based on document verification, the document listed above in 1.1.1 is available in Bahasa Indonesia and some document made bi-lingual, Bahasa Indonesia and English:</p> <ul style="list-style-type: none"> <li>- Company policies available in English and Bahasa Indonesia;</li> <li>- Company operational procedures is available in English and Bahasa Indonesia;</li> <li>- The document of Land Title/Izin HGU, Environmental Permit/AMDAL, HCV Identification/Identifikasi HCV, Social Impact Assessment available in Bahasa Indonesia;</li> <li>- The document of OHS Committee Management Plan available in Bahasa Indonesia;</li> <li>- The document of GHG identification and GHG Mitigation Plan available in Bahasa Indonesia;</li> <li>- Public summary of the certification assessment report oleh CB available in English;</li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>- Internal Audit RSPO P&amp;C Report available in Bahasa Indonesia;</li> <li>- The document of Stakeholder Complaint, Grievance and respond upon complaint and grievance from stakeholder available in Bahasa Indonesia;</li> <li>- The document of Continuous Improvement available in Bahasa Indonesia;</li> </ul>	
1.1.3	<b>(C)</b> Records of requests for information and responses are maintained.	<p>Records of requests for information and responses to requests for information from stakeholders are documented in the book "Records of Requests for Information &amp; Responses" for each Estate and Mill, for example:</p> <ul style="list-style-type: none"> <li>a. In 2020 at Bukit Maradja POM there are 5 types of requests for information from stakeholders, most of which are in the form of invitations and work visit notification letters from related agencies, for example Letter No. 170/23 / DPRD / 2020 dated January 14, 2020 which was conveyed by the DPRD Simalungun Regency regarding plans for field visits to Bukit Maradja POM.</li> <li>b. In 2020 at Bukit Maradja Estate there were no requests for information from stakeholders regarding the ongoing COVID-19 pandemic, while in 2019 there were 8 types of requests for information, most of which were requests for assistance, for example a letter sent by the Faculty of Agriculture, Universitas Brawijaya in March 2019 No. 2289 / UN10F04.01 / PP / 2019 regarding Application for Apprenticeship Permits. Meanwhile, from 2021 to February, no requests for information have been received from stakeholders.</li> <li>c. Kerasaaan Estate: In 2020 at Kerasaaan Estate there will only be 1 type of communication / request for information from stakeholders in the form of a Job Training application sent by the Jakarta Agricultural University as letter No. 006 / UPDKNS-1 / SP / II / 20 received on March 9, 2020 and the company responded by sending</li> </ul>	Complied

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		<p>a reply letter No. 54 / KRE / RMO-NS / III / 20 dated 21 March 2021.</p> <p>Whereas in 2021 to February there are 3 types of requests for information received from external parties, namely requests for heavy equipment borrowing assistance sent by Kelurahan Kerasaan I via letter dated March 1, 2021 and the company has responded by providing heavy equipment borrowing on March 4. 2021 as stated in the document of the Handover of Assistance Minutes.</p>	
<p>1.1.4</p>	<p><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>	<p>Records of communication and consultation are also documented in the book "Records of Requests for Information &amp; Responses" for each Estate and Mill, as described in indicator 1.1.4, for example:</p> <p>Bukit Maradja POM: In 2020 at Bukit Maradja POM 5 types of requests for information from stakeholders, most of which are in the form of letters of invitation and notification of work visits from related agencies, such as;</p> <ul style="list-style-type: none"> <li>- Letter sent by DPRD No. Simalungun Regency. 170/23 / DPRD / 2020 dated January 14, 2020 regarding the planned field visit to Bukit Maradja POM has been responded to by Mill management by giving approval for the visit on January 16, 2021.</li> <li>- A letter sent by the Environmental Agency of Simalungun Regency through Letter No. 660/117 / 7.5 / 20 dated 31 January 2020 regarding requests for data relating to environmental management and has been responded to by management by sending the required data on 05 February 2020.</li> <li>- Letter sent by SP-BUM on March 18, 2020 No. 014 / Org / SPBUM / Parent / 2020 regarding Change of SP-BUM Fees and the company has responded by making changes to the fee in accordance with SP-BUM's request on March 18, 2020.</li> </ul> <p>Bukit Maradja Estate: In 2020 at Bukit Maradja Estate there were no requests for information from stakeholders regarding the ongoing</p>	<p>Complied</p>

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		<p>COVID-19 pandemic, while in 2019 there were 8 types of requests for information, most of which were requests for assistance, for example;</p> <ul style="list-style-type: none"> <li>- Letter sent by the Faculty of Agriculture, Universitas Brawijaya in March 2019 No. 2289 / UN10F04.01 / PP / 2019 regarding Application for Apprenticeship Permits and has been responded to by Management on April 16, 2019 through Letter No. 017/2019. Meanwhile, from 2021 to February, no requests for information have been received from stakeholders.</li> <li>- A letter sent by the Secretariat of the Regional Government of Simalungun Regency on February 27, 2019 regarding the LKPJ of the Simalungun Regent for the Year 2018 and was responded to by Management on March 5, 2019 by sending data on the realization of activities / provision of CSR &amp; CD 2018 through Letter No. 01 / BME-Bupati / III / 2019.</li> </ul> <p>Meanwhile, from 2021 to February, no requests for information have been received from stakeholders</p> <p>Kerajaan Estate: In 2020 at Kerajaan Estate there is only 1 type of communication / request for information from stakeholders in the form of a Job Training application sent by the Jakarta Agricultural University as letter No. 006 / UDKNS-1 / SP / II / 20 received on March 9, 2020 and the company responded by sending a reply letter No. 54 / KRE / RMO-NS / III / 20 dated 21 March 2021.</p> <p>Meanwhile, in 2021 to February there are 3 types of requests for information received from external parties, namely requests for heavy equipment borrowing assistance sent by Kelurahan Kerajaan I by letter dated March 1, 2021 and the company has responded to them by providing heavy equipment lending on 04 March 2021 as stated in the document of the Handover of Assistance Minutes.</p>	
1.1.5	An up-to-date list of contacts and detailed stakeholder information is available along with designated representatives.	An updated Stakeholder List Document is available, for example:	Complied

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		<p>a. Bukit Maradja POM which was updated on February 13, 2021 consists of 44 types of stakeholders including Stakeholders from Local Government (there are 6 stakeholders), MUSPIKA (3 Stakeholders), Community Leaders (8 stakeholders), Pengulu Nagori (8 Stakeholders), Karang Taruna ( 3 stakeholders), Local NGOs (1 Stakeholder), Trade Unions (3 stakeholders), Contractors / Suppliers (10 stakeholders) and Public Services (2 stakeholders).</p> <p>b. Bukit Maradja Estate, which was updated in January 2021, consists of 25 types of stakeholders including Stakeholders from the Government (there are 6 stakeholders), MUSPIKA (3 Stakeholders), Village Heads (8 Stakeholders), Trade Unions (3 stakeholders) and Contractors / Suppliers (5 stakeholder).</p> <p>c. Kerasaan Estate which was updated on 17 February 2021 consists of 27 types of stakeholders including Stakeholders from the Government (there are 5 stakeholders), MUSPIKA (3 Stakeholders), Village Heads (5 Stakeholders), Community Leaders (2 Stakeholders), NGOs (2 Stakeholders) ), Trade Unions (3 stakeholders), and Contractors / Suppliers (8 stakeholders).</p> <p>The list of stakeholders describes the name of the agency, representative organization, address and contact number.</p>	
<p><b>Criteria 1.2:</b> The unit of certification commits to ethical conduct in all business operations and transactions.</p>			
<p>1.2.1</p>	<p>A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.</p>	<p>PT. Eastern Sumatra Indonesia refers to PT. Tolan Tiga Indonesia has Code of Conduct No.QMM-40-01-P19/21-08-2018/Rev.0 dated 28 September 2018. The code of conduct standards are the company internal guidelines for work ethics, commitment and the enforcement of company internal guideline for work ethics, commitment and the commitment and the enforcement of company regulations for individuals when conducting business and other activities, as well as interacting with stakeholders. Basic attitudes of individuals, company employees will demonstrate: Compliance with company regulations, An ethical</p>	<p>Complied</p>

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		<p>approach to their work, honesty and discipline at work, openness and willingness to improve themselves, mutual respect and courtesy towards others, egalitarian attitudes and behaviour, willingness to be placed anywhere according to company requirements and prevailing conditions.</p> <ul style="list-style-type: none"> <li>- Regulates conduct as superior, employees in superior position must always be a good role model in words and actions, being fair and open with subordinates, establish open and constructive communication with subordinates, follow a policy of always trying to coordinate cooperative relationships, fostering harmonious teamwork, avoid using position or post for personal, group or any other party's interests, etc.</li> <li>- Regulates behaviour as a Subordinate, employees in subordinate positions are expected to always be respectful and polite to supervisor and loyal to the company when executing any given task, communicate with superior honestly, openly and ethically, perform actions that are only within their authority, etc.</li> <li>- Company records, documents and information must be accountable, accurate and timely, therefore, the individuals responsible for the management of records, documents and information must be honest, objective and responsible.</li> <li>- Each individual will secure, protect, maintain and use company property the best possible way, according to the provisions, use company property only in the interests of the company.</li> <li>- The company will not tolerate insider trading practices and will take legal action against insider trading in accordance to applicable regulations.</li> <li>- Each individual has an obligation to put the interests of the company first and avoid conflicts of interest in various forms by the company. It is not permissible to have business ties, personally or involving families, that can cause business conflicts with the company.</li> </ul>	
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		<ul style="list-style-type: none"> <li>- Company employees may not become an administrator of a political party or a political candidate, unless there is written permission from the company.</li> <li>- Giving or receiving a sign of gratitude for interests in a business relationship, in the form of gifts of any kind or souvenirs, must not be done in a situation considered as an act that does not meet principle of decency and fairness. Donation can only be made for charitable purpose and other social objectives, tailored to financial capacity of the company as well as laws and regulations. The company and each individual do not give, offer or receive, directly or indirectly, anything of value or in the form of promises, that can be categorized as bribe to or from customer or government officials to influence decision.</li> <li>- Every individual is obliged to report any breach of the Code of conduct made by other individuals with sufficient evidence, through the communication channels provided by the Company.</li> <li>- The provision of sanction for breaches of the Code of conduct by individuals in the company is determined in accordance with the provisions of the company and/or prevailing laws and regulations.</li> </ul> <p><b>Bukit Maradja POM:</b> Socialization of this policy in Bukit Maradja POM carried out on 27 January 2020; attended by 8 workers from mill's office; 26 workers from Processing Shift A; 25 workers from workshop; 9 workers from gardeners, water treatment plant, dayworkers. Socialization of this policy in Bukit Maradja POM carried out on 17 January 2020; attended by 26 workers from Processing Shift B.</p> <p><b>Bukit Maradja Estate:</b> This policy communicated to contractors. For example, sighted the record of code of ethical conduct socialization on 23 February 2021. The socialization attended by 10 drivers and helper from PT. Multi Prima Nusa (FFB transporter).</p>	
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		<p><b>Kerajaan Estate:</b></p> <p>This policy communicated to contractors. For example, sighted the record of code of ethical conduct socialization on 8 February 2021. The socialization attended by 3 excavator operators from PT. Aneka Sumatrindo (replanting contractor).</p> <p>Socialization of this code of ethical conduct policy in Kerajaan Estate carried out:</p> <ul style="list-style-type: none"> <li>- 71 workers from Division I Kerajaan Estate dated 20-27 January 2021;</li> <li>- 69 workers and 15 PKWT/contract workers from Division III Kerajaan Estate, dated 4 January 2021.</li> </ul> <p>PT. Timbang Deli Indonesia has Code of Conduct No.SOP/TDI/14 dated 1 July 2017. The code of conduct standards are the company internal guidelines for work ethics, commitment and the enforcement of company internal guideline for work ethics, commitment and the commitment and the enforcement of company regulations for individuals when conducting business and other activities, as well as interacting with stakeholders. Basic attitudes of individuals, company employees will demonstrate: Compliance with company regulations, An ethical approach to their work, honesty and discipline at work, openness and willingness to improve themselves, mutual respect and courtesy towards others, egalitarian attitudes and behaviour, willingness to be placed anywhere according to company requirements and prevailing conditions.</p> <p>Socialization of this code of ethical conduct policy in Timbang Deli Estate carried out:</p> <ul style="list-style-type: none"> <li>- 31 workers from Timbang Deli Estate dated 29 January 2021 joined by field assistant, spraying mandores, harvesting mandores, harvesters, pest and disease workers, sprayers;</li> <li>- 11 workers from Timbang Deli Estate, dated 28 January 2021 joined by kindergarten teacher, paramedic, production clerk, office assistant.</li> </ul>	
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<p>1.2.2</p>	<p>A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.</p>	<p>Certificate holder conducted 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.</p> <ul style="list-style-type: none"> <li>- Internal Audit in Bukit Maradja Estate against RSPO, ISPO, ISCC standard dated 3-8 August 2020. The internal audit issued 2 Major findings, 4 Minor findings and 4 Observations; but no findings related to code of ethical conduct. Internal Audit in Bukit Maradja Estate against RSPO, ISPO, ISCC standard dated 14-16 February 2021. 2020. The internal audit issued 1 Minor finding and 1 Observation; but no findings related to code of ethical conduct.</li> <li>- Internal Audit in Kerasaan Estate against RSPO, ISPO standard dated 3-8 August 2020. The internal audit issued 1 Major finding, 5 Minor findings and 3 Observations; but no findings related to code of ethical conduct.</li> </ul> <p>“PT. Atmindo” contract “Surat Perjanjian No.03/BMM-HO/ENG/2020, signed on 25 February 2020. Section 8 stipulating: willing to comply no forced labour or employing trafficked labour; to comply all applicable regulation; to provides PPE for workers.</p> <p><b>Kerasaan Estate:</b></p> <p>Contract: “Surat Perjanjian Kerja No.02/RMO-KRE/AS/VII/2020 antara PT. Kerasaan Indonesia dengan PT. Aneka Sumatrinindo tentang Replanting OP 2021” signed on 1 July 2020. The contract, section 1 stipulates contractor’s responsibilities, i.e. contractors pays it worker in compliance with minimum wage, shall comply to rules and regulation in Indonesia. Evidence provided that contractor pays their operator for replanting (period August 2020, paid in 31 August 2020): Payslip Irmayudi (operator) Rp.3,200,000; Payslip Surya Suprianto Rp.3,200,000; Payslip Rusmanto Rp. 3,200,000; Payslip Safriadi Rp. 3,200,000.</p>	<p>Complied</p>
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		<p><b>Timbang Deli Estate:</b> Contract: "Surat Perjanjian Kerja No.TDI/BNCP/I/2012/02 antara PT. Timbang Deli Indonesia dengan CV. Biring Ndu Cahaya Panglong tentang Pengangkutan Tandan Buah Segar" signed on 1 January 2021. The contract, section 1 stipulates contractor's responsibilities, i.e. contractors pays it worker in compliance with minimum wage, shall comply to rules and regulation in Indonesia. Evidence provided that contractor pays their truck driver (period January-February 2021, paid): Payslip Safarudin (truck driver) Rp.3,800,000 in January 2021; Payslip Safarudin Rp.3,200,000 in February 2021.</p> <p><b>Contractor issued statement letter:</b> "Koperasi Jasa Bukit Maradja" issued statement letter dated 8 February 2021, stipulating: willing to comply no forced labour or employing trafficked labour; to comply all applicable regulation; to provides PPE for workers; to comply all requirements under certification system principle &amp; criteria; do not employ underage children, willing to be audited by certification body, if needed.</p> <p>"PT. Multi Prima Nusa" FFB transport contractor issued statement letter dated 8 February 2021, stipulating: willing to comply no forced labour or employing trafficked labour; to comply all applicable regulation; to provides PPE for workers; to comply all requirements under certification system principle &amp; criteria; do not employ underage children, willing to be audited by certification body, if needed.</p> <p>"Tan Tjoeng Hoa" civil material contractor issued statement letter dated 17 February 2021, stipulating: willing to comply no forced labour or employing trafficked labour; to comply all applicable regulation; to provides PPE for workers; to comply all requirements under certification system principle &amp; criteria; do not employ underage children, willing to be audited by certification body, if needed.</p>	
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		<p>"PT. Aneka Sumatrindo" issued statement letter dated 17 February 2021, stipulating: willing to comply no forced labour or employing trafficked labour; to comply all applicable regulation; to provides PPE for workers; to comply all requirements under certification system principle &amp; criteria; do not employ underage children, willing to be audited by certification body, if needed.</p>	
<p><b>Principle 2: Operate legally and respect rights</b>          Implement legal requirements as the basic principles of operation in any jurisdiction.</p>			
<p><b>Criteria 2.1:</b> There is compliance with all applicable local, national and ratified international laws and regulations.</p>			
2.1.1	<p><b>(C)</b> The unit of certification complies to relevant regulations.</p>	<p>Based on document verification, it shows that the company has evaluated compliance with laws and regulations, as follows:  <b>PT Eastern Sumatra Indonesia and PT Kerasaan Indonesia:</b>          The company monitors changes in laws and regulations that occur and is stated in the document "Monitoring the Addition or Amendment of Laws / Regulations in 2020". Based on the document verification, there are 13 types of changes or additions to laws and regulations that are relevant to the operations of the Plantation and POM, for example:</p> <ul style="list-style-type: none"> <li>- Governor of North Sumatra Decree No. 188.44 / 597 / Kpts / 2020 concerning Simalungun Regency Sectoral Minimum Wage in 2021 (new regulation).</li> <li>- Regulation of the Minister of Environment and Forestry of the Republic of Indonesia No. P.4 / MenLHK / Setjen / KKUM.1 / 1/2020 concerning the transportation of hazardous and toxic waste which replaces the Decree of the Head of Bapedal No. 2 of 1995 regarding the document of hazardous and toxic waste materials.</li> <li>- Minister of Manpower Circular No. M / 3 / HK.04 / III / 2020 concerning the protection of workers / laborers and business</li> </ul>	Complied

		<p>continuity in the context of preventing and handling COVID-19 (new regulations).</p> <ul style="list-style-type: none"> <li>- Minister of Manpower Regulation No. 8 of 2020 concerning the safety and health of lift aircraft and transport aircraft as a substitute for the Minister of Manpower Regulation No. 05 of 1985 regarding lift and transport aircraft.</li> </ul> <p>The document describes the description of the type of regulation (new / replacement), whether it affects the system, the source of the regulatory document, things that need to be reviewed, approved, and notes.</p> <p>The company also evaluates each new statutory regulation for each type of regulation, for example:</p> <ul style="list-style-type: none"> <li>- In 2020, an evaluation of 3 types of laws and regulations related to the aspect of manpower will be evaluated, such as the Minister of Manpower Regulation No. 8 of 2020 concerning occupational safety and health of lift and transport aircraft, Regulation of the Minister of Manpower No. 14 of 2020 concerning Guidelines for Providing Government assistance in the form of salary / wage subsidies for workers / laborers in handling the impact of COVID-19.</li> <li>- In 2020, an evaluation of 4 types of laws and regulations related to environmental and forestry aspects will be conducted, such as the Regulation of the Minister of Environment and Forestry of the Republic of Indonesia No. P.4 / MenLHK / Setjen / KKUM.1 / 1/2020 concerning the transportation of hazardous and toxic waste, Regulation of the Minister of Environment and Forestry of the Republic of Indonesia No. P.12 / MenLHK / Setjen / PLB.3 / 05/2020 concerning the storage of hazardous and toxic waste.</li> </ul> <p>In 2020, 2 types of laws and regulations issued by the Ministry of Agriculture will be evaluated, such as the Minister of Agriculture</p>	
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		<p>Regulation No. 38 of 2020 concerning the implementation of certification of Indonesian sustainable palm oil plantations.</p> <p>Based on interviews with related agencies (Plantation Office, Environmental Service, Manpower Office and Land Office of Simalungun Regency) as well as interviews with local village heads and trade union officials, it shows that there is no indication that the company does not comply with existing laws and regulations starting from related regulations. with the legality of land, legality of business legal entities, payment of obligations to the state (taxes / levies), regulations related to manpower, regulations related to environmental management, etc.</p> <p>Based on field visits and document verification, PT Eastern Sumatra Indonesia and PT Kerasaan Indonesia have been able to show evidence of compliance with statutory regulations such as Plantation Business Permits, HGU Permits, Maintenance of HGU stakes carried out properly, proof of payment of wages in accordance with applicable regulations, Calculation overtime pay is in accordance with applicable regulations, granting leave permits for workers, participation of all levels of employees in the BPJS Employment and BPJS Health programs, environmental permits are still relevant, permits for utilization of liquid waste are still valid, permits for hazardous waste storage are still valid, submission of reports which is the company's obligation to the relevant agencies is also carried out in a timely manner (Mandatory Workforce Transport, RKL-RPL Implementation Semester Reports, P2K3 quarterly reports, B3 waste management quarterly reports, quarterly reports on the use of liquid waste to the ground / Land Applications etc.).</p> <p><b>PT Timbang Deli Indonesia:</b></p> <p>The company monitors the changes in laws and regulations that occur and is outlined in the documents "Monitoring the Addition or Amendment of Laws / Regulations in 2020" and "Monitoring the Additions or Changes to Laws / Regulations in 2021". Based on the document verification, there are 20 types of amendments or additions</p>	
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		<p>to laws and regulations that are relevant to Plantation operations, for example:</p> <ul style="list-style-type: none"> <li>- Governor of North Sumatra Decree No. 188.44 / 574 / Kpts / 2020 concerning the Minimum Wage for Deli Serdang Regency in 2021 (new regulations).</li> <li>- Regulation of the Minister of Health of the Republic of Indonesia No. HK.01.07 / Menkes / 328/2020 regarding Guidelines for the prevention and control of COVID-19 in office and industrial workplaces in supporting business continuity in pandemic situations (new regulations).</li> <li>- Regulation of the Minister of Agriculture of the Republic of Indonesia No. 38 of 2020 concerning the Implementation of Certification of Indonesian Sustainable Oil Palm Plantations (new regulations).</li> <li>- Minister of Manpower Regulation No. 8 of 2020 concerning the safety and health of lift aircraft and transport aircraft as a substitute for the Minister of Manpower Regulation No. 05 of 1985 regarding lift and transport aircraft.</li> </ul> <p>The document describes the description of the type of regulation (new / replacement), whether it affects the system, the source of the regulatory document, things that need to be reviewed, approved, and notes.</p> <p>The company also evaluates the changes in the laws and regulations that have occurred and is outlined in the document "Evaluation of the Compliance of the Laws of 2020". Based on the document verification, there are 20 types of changes or additions to laws and regulations that are relevant to plantation operations, for example:</p> <ul style="list-style-type: none"> <li>- In 2020, 19 types of new regulations will be evaluated as well as changes to previous regulations.</li> </ul>	
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		<p>- In 2021, 1 new type of regulation will be evaluated.</p> <p>The document describes information on the types of regulations (new / replacement), proof of compliance, compliance evaluation and evaluation date.</p> <p>Based on interviews with related agencies (Plantation Office, Environmental Service, Manpower Office and Land Office of Deli Serdang Regency) as well as interviews with local village heads and trade union officials, it shows that there is no indication that the company does not comply with existing laws and regulations starting from regulations. related to land legality, legality of business legal entities, payment of obligations to the state (taxes / levies), regulations related to manpower, regulations related to environmental management, etc.</p> <p>Based on field visits and document verification, PT Timbang Deli Indonesia has been able to show evidence of compliance with statutory regulations such as Plantation Business Permits, HGU Permits, Maintenance of HGU stakes are carried out properly, proof of payment of wages in accordance with applicable regulations, Calculation of overtime pay according to regulations. that applies, the granting of leave permits for workers, the participation of all levels of employees in the BPJS Employment and BPJS Health programs, the environmental permit is still relevant, the hazardous waste storage permit is still valid, the submission of reports that are the company's obligations to the relevant agencies is also done in a timely manner (Mandatory Labor Report, RKL-RPL Implementation Semester Reports, P2K3 Quarterly Reports, B3 Waste Management Quarterly Reports, etc.)</p>	
2.1.2	A documented system for ensuring legal compliance is in place. This system has means to track changes to the law and also includes listing and evidence on evaluation of legal compliance of all contracted third parties, such as: recruitment agencies, service provider and labour contractor.	<p><b>PT Eastern Sumatra Indonesia and PT Kerasaan Indonesia:</b></p> <p>The mechanism for complying with statutory regulations is regulated in the "Legal and Corporate Affairs Department Manual", namely SOP No. LCA-01-08 / 24-01-2020 / Rev.0 concerning Update Information on News and Regulations which was approved by management on March</p>	Complied

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		<p>17, 2020. In this procedure it is explained that the updating of regulations is carried out if there are new regulations issued or changes to regulations legal opinion from the VPL if necessary.</p> <p>The company has documented 259 types of regulations relevant to oil palm plantation operations and POM in 2020, including international conventions, national laws and local regulations.</p> <p>The company monitors changes in laws and regulations that occur and is stated in the document "Monitoring the Addition or Amendment of Laws / Regulations in 2020". Based on the document verification, there are 13 types of changes or additions to laws and regulations that are relevant to POM operations, for example:</p> <ul style="list-style-type: none"> <li>- Governor of North Sumatra Decree No. 188.44 / 597 / Kpts / 2020 concerning the Sectoral Minimum Wage in Simalungun Regency in 2021 (new regulation).</li> <li>- Regulation of the Minister of Environment and Forestry of the Republic of Indonesia No. P.4 / MenLHK / Setjen / KKUM.1 / 1/2020 concerning the transportation of hazardous and toxic waste which replaces the Decree of the Head of Bapedal No. 2 of 1995 regarding the document of hazardous and toxic waste materials.</li> <li>- Minister of Manpower Circular No. M / 3 / HK.04 / III / 2020 concerning the protection of workers / laborers and business continuity in the context of preventing and handling COVID-19 (new regulations).</li> <li>- Minister of Manpower Regulation No. 8 of 2020 concerning the safety and health of lift aircraft and transport aircraft as a substitute for the Minister of Manpower Regulation No. 05 of 1985 regarding lift and transport aircraft.</li> </ul> <p>The document describes the description of the type of regulation (new / replacement), whether it affects the system, the source of the</p>	
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		<p>regulatory document, things that need to be reviewed, approved, and notes.</p> <p>The company also evaluates each new statutory regulation for each type of regulation, for example:</p> <ol style="list-style-type: none"> <li>a. In 2020, an evaluation of 3 types of laws and regulations related to the aspect of manpower will be evaluated, such as the Minister of Manpower Regulation No. 8 of 2020 concerning occupational safety and health of lift and transport aircraft, Regulation of the Minister of Manpower No. 14 of 2020 concerning Guidelines for Providing Government assistance in the form of salary / wage subsidies for workers / laborers in handling the impact of COVID-19.</li> <li>b. In 2020, an evaluation of 4 types of laws and regulations related to environmental and forestry aspects will be conducted, such as the Regulation of the Minister of Environment and Forestry of the Republic of Indonesia No. P.4 / MenLHK / Setjen / KKUM.1 / 1/2020 concerning the transportation of hazardous and toxic waste, Regulation of the Minister of Environment and Forestry of the Republic of Indonesia No. P.12 / MenLHK / Setjen / PLB.3 / 05/2020 concerning the storage of hazardous and toxic waste.</li> <li>c. In 2020, 2 types of laws and regulations issued by the Ministry of Agriculture will be evaluated, such as the Minister of Agriculture Regulation No. 38 of 2020 concerning the implementation of certification of Indonesian sustainable palm oil plantations.</li> </ol> <p><b>PT Timbang Deli Indonesia:</b></p> <p>The company has shown the documents of the evaluation results of the changes in the laws and regulations that have occurred and is stated in the document "Evaluation of Compliance with the Laws of 2020". Based on the document verification, there are 20 types of changes or additions to laws and regulations that are relevant to plantation operations, for example:</p>	
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		<ul style="list-style-type: none"> <li>- In 2020, 19 types of new regulations will be evaluated as well as changes to previous regulations.</li> <li>- In 2021, 1 new type of regulation will be evaluated.</li> </ul> <p>The document describes information on the types of regulations (new / replacement), proof of compliance, compliance evaluation and evaluation date.</p>	
2.1.3	<p>Legal or authorized boundaries are clearly demarcated and visibly maintained and there is no planting beyond these legal or authorized boundaries.</p>	<p><b>PT ESI and PT KI:</b> The company has compiled a HGU stakes maintenance procedure as regulated in document No. LCA-01-04 / 01-02-2020 / Rev 0 (Maintain HGU Pillars) signed by Management on 18 February 2020.</p> <p><b>PT Timbang Deli Indonesia:</b> The company already has the HGU Mark Inspection &amp; Maintenance Work Instruction document which is regulated in document No. WI / TDI / 08, Rev 0 dated March 03, 2020.</p> <p>Based on document verification and interviews with employees, it shows that PT Eastern Sumatra Indonesia, PT Kerasaan Indonesia and PT Timbang Deli Indonesia have identified HGU benchmarks as stated in the HGU Measurement Book and consistently perform maintenance on these HGU markers. There is a special officer who is responsible for monitoring every month the HGU markers and it is reported in the "Check for HGU Patent Check" for the Bukit Maradja Estate and Kerasaan Estate, while at PT Timbang Deli Indonesia the monitoring results of HGU Stakes are recorded in the document "Book of Stake Condition Report. HGU / Boundary ". The form document / report book describes the condition of each HGU stake and the actions that need to be taken if it requires repair of damaged stakes or replacement if there are missing stakes, for example:</p> <p>a. In February 2021 at Bukit Maradja Estate, Division 1 (F1), HGU markers were monitored on February 28 against 9 existing HGU</p>	Complied

		<p>stakes (Patok No. 14a - 21). The monitoring results showed that all the stakes were in good condition and well maintained.</p> <p>b. On January 21, 2021, monitoring and maintenance was carried out at 16 HGU stakes located in Divisions III and IV (Bukit Maradja Estate). The monitoring results showed that all the stakes were in good condition and well maintained.</p> <p>c. On January 22, 2021, monitoring and maintenance was carried out at 13 HGU stakes located in Division IV (Bukit Maradja Estate). The monitoring results showed that all the stakes were in good condition and well maintained.</p> <p>d. On January 23, 2021, monitoring and maintenance was carried out at 19 HGU stakes located in Divisions I, II and III (Bukit Maradja Estate). The monitoring results showed that all the stakes were in good condition and well maintained.</p> <p>e. In February 2021, PT Timbang Deli conducted monitoring of HGU pegs on February 1 against the 13 existing HGU stakes (Patok No.1 - 13). The monitoring results showed that all the stakes were in good condition and well maintained.</p> <p>f. In August 2020 at PT Timbang Deli Indonesia, HGU pegs were monitored on August 1 against the 13 existing HGU stakes (Patok No.1 - 13). The monitoring results showed that all the stakes were in good condition and well maintained.</p> <p><b>PT Timbang Deli Indonesia</b></p> <p>Based on the field visit, it shows that the company has made improvements to the coordinates of the HGU mark in the field (Patok HGU No. 01) adjusted to the coordinate points in the document "HGU Peg PT Timbang Deli Indonesia" written 3 ° 28'9,067 "N and 98 ° 53 ' 58,529 "E, where previously the stake was the identity of the stake at</p>	
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		<p>the coordinate point 3 ° 28 '7,358" N and 98 ° 54' 0,729 "E.</p> <p>a. Based on the field visit, it also shows that the company has made improvements to 1 HGU marker whose identity cannot be read, namely HGU Patent No 13</p>	
<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 available.	<p><b>Bukit Maradja Estate:</b> List of contractor provides service in Bukit Maradja Estate recorded under "Bukit Maradja Estate Daftar Stakeholder", updated January 2021". There are 5 contractors: Koperasi Jasa Bukit Maradja (manpower supplier), UD Sumber Teknik (civil material, building material, civil work contractor), UD Sejahtera (office utensil supplier), PT. Multi Prima Nusa (FFB transporter), PT. Aneka Sumatrindo (replanting contractor).</p> <p><b>Kerasaan Estate:</b> List of contractor provides service in Kerasaan Estate recorded under "Daftar Pemangku Berkepentingan", updated 17 January 2021. There are 7 contractors: Koperasi Konsumen Kerasaan (manpower supplier), UD Sumber Teknik (civil material, building material, civil work contractor), UD Sejahtera (office utensil supplier), PT. Multi Prima Nusa (FFB transporter), PT. Aneka Sumatrindo (Ganoderma sanitation), PT. Spectra Utima Perkasa (monitoring tower), CV Sinar Perkasa (fire extinguisher refill).</p> <p><b>Timbang Deli Estate:</b> List of contractor provides service in Timbang Deli Estate recorded under "Daftar Stakeholder PT. Timbang Deli Indonesia", updated 5 January 2021. There are 3 contractors listed: Koperasi Jasa Karyawan Timbang Deli (manpower supplier), PT. SSI (security supplier), CV Biring Ndu Cahaya Panglong (FFB transport).</p>	Complied

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		<p>Koperasi Jasa Bukit Maradja, Koperasi Konsumen Kerasaan and Koperasi Jasa Karyawan Timbang Deli are the manpower supplier organization to provide Free Labour/Casual Worker. The job under this contract is for General Worker such as gardener, manual upkeep like wooden uproot, slashing, grass mover.</p>	
<p>2.2.2</p>	<p>All contract, including those for FFB supply, contain specific clause on meeting relevant legal requirements and this can be demonstrated by the third party.</p>	<p><b>Bukit Maradja Estate:</b> Contract for FFB transport: "Surat Perjanjian Kerja No.01/RMO-BME/MPN/I/2021 antara PT. Eastern Sumatra Indonesia dengan PT. Multi Prima Nusa tentang Angkut FFB" signed on 4 January 2021. The contract, section 5 stipulates Contractor shall responsible to any accident in the working area PT. Eastern Sumatra Indonesia, referring to "Undang-undang Kecelakaan Kerja No.33 tahun 1974"; Contractor pays income tax as tax regulation in Indonesia; Contractor shall abide to Company Policy: prohibit child worker, does not employ worker under 18 years old, prohibit forced labor, do not use trafficked workers; Contractor shall pay the worker using applicable minimum wage; Contractor shall support the implementation of sexual harassment prohibition; Contractor shall abide to all relevant regulation and comply to principle and criteria from certification standard. Timeframe agreed on Section 4: start 3 January 2021 – 31 December 2021.</p> <p><b>Bukit Maradja POM</b> Contract for boiler maintenance: "Surat Perjanjian Kerja No.03/BMM-HO/ENG/2020 antara PT. Eastern Sumatra Indonesia dengan PT. Atmindo tentang Rekondisi Packing Groove Sterilizer No.1" signed on 25 February 2020. The contract, section 8 stipulates Contractor shall responsible to any accident in the working area PT. Eastern Sumatra Indonesia, Contractor pays income tax as tax regulation in Indonesia; Contractor shall abide to Company Policy: prohibit child worker, does not employ worker under 18 years old, prohibit forced labor, do not use trafficked workers; Contractor shall pay the worker using applicable</p>	<p>Complied</p>

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		<p>minimum wage; Timeframe agreed on Section 3: start work period 60 days starting 7 days from agreement signed.</p> <p><b>Kerasaan Estate:</b> Contract for replanting: "Surat Perjanjian Kerja No.02/RMO-KRE/AS/VII/2020 antara PT. Kerasaan Indonesia dengan PT. Aneka Sumatrindo tentang Replanting OP 2021" signed on 1 July 2020. The contract, section 1 stipulates shall comply to rules and regulation in Indonesia.</p> <p><b>Timbang Deli Estate:</b> Contract for FFB transport: "Surat Perjanjian Kerja No.TDI/BNCP/I/2021/02 antara PT. Timbang Deli Indonesia dengan CV. Biring Ndu Cahaya Panglong tentang Pengangkutan Tandan Buah Segar" signed on 1 January 2021. The contract, section 6 stipulates contractor shall comply to rules and regulation in Indonesia.</p>	
2.2.3	All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour.	<p><b>Bukit Maradja Estate:</b> Contract: "Surat Perjanjian Kerja No.02/GMO-BME/AS/I/2021 antara PT. Eastern Sumatra Indonesia dengan PT. Aneka Sumatrindo tentang Sanitasi Ganoderma Persiapan Replanting 2023" signed on 4 January 2021. The contract, section 1 stipulates contractor's responsibilities, i.e. does not employ worker under 18 years old. "PT. Aneka Sumatrindo" issued statement letter dated 17 February 2021, stipulating: willing to comply no forced labour or employing trafficked labour; to comply all applicable regulation; to provides PPE for workers; to comply all requirements under certification system principle &amp; criteria; do not employ underage children, willing to be audited by certification body, if needed.</p> <p>Contract: "Surat Perjanjian Kerja No.01/RMO-BME/MPN/I/2021 antara PT. Eastern Sumatra Indonesia dengan PT. Multi Prima Nusa tentang Angkut FFB" signed on 4 January 2021. The contract, section 5 stipulates Contractor shall abide to Company Policy: prohibit child worker, does</p>	Complied

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		<p>not employ worker under 18 years old, prohibit forced labor, do not use trafficked workers.</p> <p><b>Kerasaan Estate:</b>          Contract: "Surat Perjanjian Kerja No.02/RMO-KRE/AS/VII/2020 antara PT. Kerasaan Indonesia dengan PT. Aneka Sumatrindo tentang Replanting OP 2021" signed on 1 July 2020. The contract, section 1 stipulates contractor's responsibilities, i.e. does not employ worker under 18 years old, provides PPE, contractors pays it worker in compliance with minimum wage, worker/operator holds operator license, prevent sexual harassment, shall comply to rules and regulation in Indonesia.</p> <p><b>Timbang Deli Estate</b>          Contract for FFB transport: "Surat Perjanjian Kerja No.TDI/BNCP/I/2021/02 antara PT. Timbang Deli Indonesia dengan CV. Biring Ndu Cahaya Panglong tentang Pengangkutan Tandan Buah Segar" signed on 1 January 2021. The contract, section 6 stipulates contractor's responsibilities, i.e. does not employ worker under 18 years old, pays the insurance, provides PPE, contractors pays it worker in compliance with minimum wage, prevent sexual harassment, shall comply to rules and regulation in Indonesia, forced labor/trafficked labor.</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, Palm Oil Mill (POM) requires:</p> <ul style="list-style-type: none"> <li>• Information regarding the geolocation of FFB origins;</li> <li>• Proof of ownership status, right/claim of the land by grower/smallholder;</li> <li>• If relevant, valid planting/operational/trading license, or is part of a cooperative which allows the buying and selling of FFB.</li> </ul>	<p>Based on document verification, interviews with related parties as well as field visits to plantations and mills show that up to the implementation of the Audit, Bukit Maradja POM only processed FFB originating from nucleus estates consisting of Bukit Maradja Estate, Kerasaan Estate and Timbang Deli Estate.</p>	<p>Complied</p>

2.3.2	For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in indicator 2.3.1.	Based on document verification, interviews with related parties as well as field visits to plantations and mills show that up to the implementation of the Audit, Bukit Maradja POM only processed FFB originating from nucleus estates consisting of Bukit Maradja Estate, Kerasaan Estate and Timbang Deli Estate.	Complied																																																												
<p><b>Principle 3: Optimise productivity, efficiency, positive impact and resilience</b>          Implement plans, procedures and systems for continuous improvement.</p>																																																															
<p><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.</p>																																																															
3.1.1	<p><b>(C)</b> A business or management plan (minimum of three years) is documented and where applicable, includes a jointly developed business case for Scheme Smallholders.</p>	<p><b>Bukit Maradja Estate:</b>          PT. Eastern Sumatra Indonesia prepared Business Plan 2021- 2031, explaining the estimated crop, and cost to bear</p> <table border="1" data-bbox="1131 799 1980 1382"> <thead> <tr> <th>Year</th> <th>FFB production (MT)</th> <th>Field work cost (Rp/kg)</th> <th>Harvesting cost (Rp/kg)</th> <th>General charges (Rp/kg)</th> </tr> </thead> <tbody> <tr><td>2021</td><td>66,360</td><td>305</td><td>141</td><td>246</td></tr> <tr><td>2022</td><td>62,439</td><td>305</td><td>141</td><td>246</td></tr> <tr><td>2023</td><td>59,525</td><td>305</td><td>141</td><td>246</td></tr> <tr><td>2024</td><td>57,424</td><td>305</td><td>141</td><td>246</td></tr> <tr><td>2025</td><td>57,136</td><td>305</td><td>141</td><td>246</td></tr> <tr><td>2026</td><td>56,998</td><td>305</td><td>141</td><td>246</td></tr> <tr><td>2027</td><td>61,280</td><td>305</td><td>141</td><td>246</td></tr> <tr><td>2028</td><td>61,829</td><td>305</td><td>141</td><td>246</td></tr> <tr><td>2029</td><td>64,032</td><td>305</td><td>141</td><td>246</td></tr> <tr><td>2030</td><td>64,896</td><td>305</td><td>141</td><td>246</td></tr> <tr><td>2031</td><td>65,096</td><td>305</td><td>141</td><td>246</td></tr> </tbody> </table>	Year	FFB production (MT)	Field work cost (Rp/kg)	Harvesting cost (Rp/kg)	General charges (Rp/kg)	2021	66,360	305	141	246	2022	62,439	305	141	246	2023	59,525	305	141	246	2024	57,424	305	141	246	2025	57,136	305	141	246	2026	56,998	305	141	246	2027	61,280	305	141	246	2028	61,829	305	141	246	2029	64,032	305	141	246	2030	64,896	305	141	246	2031	65,096	305	141	246	Complied
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		2022	5,804	472			
		2023	6,760	472			
		2024	7,926	472			
		2025	9,162	472			
		2026	10,399	472			
		2027	11,784	472			
		2028	12,896	472			
		2029	13,883	472			
		2030	14,522	472			
		<p><b>Bukit Maradja POM:</b>            PT. Eastern Sumatra Indonesia prepared Production Plan 2021-2031</p>					
		Year	FFB own estate (MT)	FFB smallholder* (MT)	CPO (MT)	PK (MT)	
		2021	67,257	7,628	29,608	2,981	
		2022	62,728	7,628	27,584	2,755	
		2023	61,266	7,628	26,555	2,682	
		2024	60,576	7,628	25,901	2,647	
		2025	62,630	7,628	26,315	2,750	
		2026	64,368	7,628	26,694	2,837	
		2027	70,965	7,628	29,250	3,167	
		2028	79,836	7,628	31,465	3,610	

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		<table border="1"> <tr> <td>2029</td> <td>86,370</td> <td>7,628</td> <td>33,518</td> <td>3,937</td> </tr> <tr> <td>2030</td> <td>90,296</td> <td>7,628</td> <td>36,644</td> <td>4,133</td> </tr> <tr> <td>2031</td> <td>93,921</td> <td>7,628</td> <td>35,543</td> <td>4,315</td> </tr> </table> <p>*) FFB from smallholder received and sold to external mill – until become certified supply base.</p>	2029	86,370	7,628	33,518	3,937	2030	90,296	7,628	36,644	4,133	2031	93,921	7,628	35,543	4,315																												
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<p>3.1.2</p>	<p>An annual replanting programme projected for a minimum of five years with yearly review, is available.</p>	<p><b>Bukit Maradja Estate:</b>  Replanting Program 2021 – 2031</p> <table border="1"> <thead> <tr> <th>Replanting year</th> <th>Planting Year</th> <th>Total Hectarage (Ha)</th> </tr> </thead> <tbody> <tr> <td>2021</td> <td>1996, 1997, 1999</td> <td>167.61</td> </tr> <tr> <td>2022</td> <td>2001</td> <td>185.09</td> </tr> <tr> <td>2023</td> <td>1993, 1994, 1996</td> <td>142.78</td> </tr> <tr> <td>2024</td> <td>1996, 1997, 1999</td> <td>193.68</td> </tr> <tr> <td>2025</td> <td>1996, 1997</td> <td>203.59</td> </tr> <tr> <td>2026</td> <td>1996, 2002</td> <td>148.95</td> </tr> <tr> <td>2027</td> <td>2002</td> <td>173.68</td> </tr> <tr> <td>2028</td> <td>-</td> <td>-</td> </tr> <tr> <td>2029</td> <td>2003</td> <td>158.40</td> </tr> <tr> <td>2030</td> <td>2003</td> <td>103.52</td> </tr> <tr> <td>2031</td> <td>2005</td> <td>153.14</td> </tr> </tbody> </table> <p><b>Kerasaan Estate:</b>  Replanting Program 2021 – 2031</p> <table border="1"> <thead> <tr> <th>Replanting year</th> <th>Planting Year</th> <th>Total Hectarage (Ha)</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Replanting year	Planting Year	Total Hectarage (Ha)	2021	1996, 1997, 1999	167.61	2022	2001	185.09	2023	1993, 1994, 1996	142.78	2024	1996, 1997, 1999	193.68	2025	1996, 1997	203.59	2026	1996, 2002	148.95	2027	2002	173.68	2028	-	-	2029	2003	158.40	2030	2003	103.52	2031	2005	153.14	Replanting year	Planting Year	Total Hectarage (Ha)				<p>Complied</p>
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3.1.3	The unit of certification holds management review at planned term according to the scale and nature of the activities undertaken.	<p>PT. Eastern Sumatra Indonesia demonstrated</p> <p>a. "Bukit Maradja Estate Management Review Report Implementasi Sistem Sustainability RSPO, ISCC, ISPO" dated 5 October 2020. The management review consists of:</p> <ul style="list-style-type: none"> <li>- Internal Audit result dated 3-8 August 2020;</li> <li>- Customer feedback: no significant complaint related to FFB sent for Bukit Maradja POM;</li> <li>- Process performance and product conformity: upkeep and harvesting followed Oil Palm Agriculture Manual; FFB quality follows FFB Grading Procedure Lab-01-10/11-08-2020/Rev.4;</li> </ul>	Complied																																	

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		<ul style="list-style-type: none"> <li>- Correction and Prevention: All internal audit findings have been closed.</li> <li>- Follow up from previous Management Review: Has been followed up, as part of internal audit.</li> <li>- Changes affecting Management System: No company policy changes; No changes in procedure and work instruction.</li> <li>- Recommendation for Improvement: corrective action need to be closed faster.</li> </ul> <p>Internal audit was carried out on 3-8 August 2020. 2 Major findings and 4 Minor findings issued. Status closed as of October 2020.</p> <p>b. "Kerajaan Estate Management Review Report Implementasi Persyaratan P&amp;C RSPO, ISPO" dated 15 October 2020. The management review consists of:</p> <ul style="list-style-type: none"> <li>- Internal Audit result dated 3-8 August 2020;</li> <li>- Customer feedback: no significant complaint related to FFB sent for Bukit Maradja POM;</li> <li>- Process performance and product conformity: upkeep and harvesting followed Oil Palm Agriculture Manual; FFB quality follows FFB Grading Procedure Lab-01-10/11-08-2020/Rev.4;</li> <li>- Correction and Prevention: All internal audit findings have been closed.</li> <li>- Follow up from previous Management Review: Has been followed up, as part of internal audit.</li> <li>- Changes affecting Management System: No company policy changes; No changes in procedure and work instruction.</li> <li>- Recommendation for Improvement: corrective action needs to be closed faster.</li> </ul>	
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		<p>Internal audit was carried out on 3-8 August 2020. 1 Major finding and 5 Minor findings and 3 Observation issued. Status closed as of October 2020.</p> <p>c. "Bukit Maradja POM Management Review Report Implementasi Persyaratan P&amp;C RSPO, ISPO" dated 15 October 2020. The management review consists of:</p> <ul style="list-style-type: none"> <li>- Internal Audit result dated 14-21 August 2020;</li> <li>- Customer feedback: no significant complaint related to FFB sent for Bukit Maradja POM;</li> <li>- Process performance and product conformity: upkeep and harvesting followed Oil Palm Agriculture Manual; FFB quality follows FFB Grading Procedure Lab-01-10/11-08-2020/Rev.4;</li> <li>- Correction and Prevention: All internal audit findings have been closed.</li> <li>- Follow up from previous Management Review: Has been followed up, as part of internal audit.</li> <li>- Changes affecting Management System: No company policy changes; No changes in procedure and work instruction.</li> <li>- Recommendation for Improvement: corrective action needs to be closed faster.</li> </ul> <p>Internal audit was carried out on 14-21 August 2020. 1 Major finding and 5 Minor findings. Status closed as of September 2020.</p>	
<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>			
3.2.1	<p><b>(C)</b> The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impact and opportunities of the unit of certification.</p>	<p><b>Bukit Maradja Estate:</b> Estate implements action plan from Senior Estate Manager North Sumatra:</p>	Complied

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		<ul style="list-style-type: none"> <li>- Canal construction with civil work – under contracting process;</li> <li>- Weed sanitation for polybag in nursery to ensure no weed in polybag – conducted consistently during spraying and weeding into polybag;</li> <li>- Briefing to manuring team to ensure fertilizer packing not breaking out – briefing done week 1 February 2021;</li> <li>- Construction of Giltrap path for compost application in OP2013 using bulldozer for application of compost using spreader/Giltrap – done February – March 2021;</li> <li>- Application of <i>Cordysep</i> to control cocoon of nettle caterpillar – February on blocks identified.</li> </ul> <p><b>Kerasaan Estate:</b> Estate implements action plan from Senior Estate Manager North Sumatra, dated 27 January 2021:</p> <ul style="list-style-type: none"> <li>- Crop production under budget (-13.16%), budget per harvester 2.3MT/mandays, FFB abnormal OP 2014, OP201 need attention – OP2014/2015 having pollination issues; FFB abnormal to be reported;</li> <li>- Pest &amp; disease: Nettle caterpillar and bagworm reduced compared to 2016-2019, target for trunk injection team 3Ha/team – cordysep application 628.24 Ha, Beneficial Plant introduction;</li> <li>- Loose Fruit Collector capacity – to increase the loose fruit collector productivity on January 2021;</li> </ul> <p><b>Bukit Maradja POM:</b> Vice President Engineering Report Action Plan, dated 6 February 2020:</p> <ul style="list-style-type: none"> <li>- There are large number of file should be transferred to BP file store – Some files with more than 10 years retention time disposed off;</li> <li>- Make plan to empty and clean effluent tanks during Lebaran holiday – Effluent tank cleaning carried out during Lebaran holiday.</li> </ul>	
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		<ul style="list-style-type: none"> <li>- Repair roof at water intake' pump house – Intake pump house has been repaired by Bukit Maradja Estate;</li> <li>- Drain around the water basin need to be cleaned – rain around water basin has been cleaned on February 2020 and routine cleaning performed.</li> <li>- Door to main switch room is broken and air conditioner in main switch board was not working properly – door has been repaired, New air conditioner unit installed in May 2020.</li> <li>- Fabricating guard for screw press to CBC – Bukit Maradja POM fabricated the guard so the fibre and nut from screw press fall directly into cake bake conveyor and not on press platform.</li> <li>- Rail track floor was cracking – Bukit Maradja POM put concrete layer on rail track floor, completed 26 May 2020.</li> <li>- Steam pipe leaking – Bukit Maradja POM identified and prepare inventory of leaking steam pipes: replace 1 unit steam trap; replace 1 unit valve, completed 28 June 2020.</li> </ul> <p>“Program Continuous Improvement PT. Timbang Deli Indonesia” Tahun 2021, No spraying on riparian area period January – December 2021; Planting beneficial plant period January – December 2021; Maintains barn owl box <i>Tyto Alba</i> period January – December 2021; Maintains <i>Sycanus</i> period January – December 2021.</p>	
3.2.2	As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat by Certification Body during Annual Surveillance Assessment by using the RSPO metrics template.	PT. Eastern Sumatra Indonesia - Bukit Maradja POM and its supply base has joined training on RSPO metrics template. The Certificate holder will use the RSPO metrics template as per grace period, starting 1 June 2021.	Not Applicable
<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.	Estate:	Complied



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		<p>The procedures documented in "Oil Palm Agricultural Manual" (latest revision in March 2020), 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. 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 02/10/2018; Land Preparation – Persiapan Lahan.</li> <li>9. OPM-03-04; dated 02/10/2017; Legume Cover Crop <i>Mucuna bracteata</i> – <i>Mucuna bracteata</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> </ol>	
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		<p>12. OPM-04-02; dated 02/10/2017; Thinning Out and Removing Plant – Penjarangan dan pembongkaran Tanaman.</p> <p>13. OPM-05-01; dated 02/10/2018; Ablation and Sanitation – Ablasi dan Sanitasi.</p> <p>14. OPM-05-02; dated 17/07/2019; Harvesting – Panen.</p> <p>15. OPM-05-03; dated 17/07/2019; FFB and LF Delivery – Pengiriman TBS dan Berondolan.</p> <p>16. OPM-05-04; dated 18/07/2019; Frond Pruning – Pemangkasan Pelepah</p> <p>17. OPM-05-05; dated 19/03/2020; Black Bunch Count – Sensus Buah</p> <p>18. OPM-05-06; dated 02/10/2017; <i>Elaeobius camerunicus</i> Management – Pengelolaan <i>Elaeobius camerunicus</i>.</p> <p>19. OPM-06-01; dated 19/03/2020; Inorganic Fertiliser – Pupuk Inorganik</p> <p>20. OPM-06-02; dated 19/03/2020; Organic Fertiliser – Pupuk Organik</p> <p>21. OPM-06-03; dated 02/10/2017; LSU: Palm Marking – LSU: Penandaan Tanaman.</p> <p>22. OPM-06-04; dated 02/10/2017; Leaf Sampling Unit (LSU) and Rachis Sampling Unit (RSU) – Pengambilan Sampel.</p> <p>23. OPM-07-01; dated 20/03/2020; Detection and Census – Deteksi dan Sensus.</p> <p>24. OPM-07-02; dated 02/10/2017; Pest Control – Pengendalian Hama.</p> <p>25. OPM-07-03; dated 02/10/2017; Disease Control – Pengendalian Penyakit.</p> <p>26. OPM-07-04; dated 17/07/2019; Integrated Pest Management – Pengendalian Hama Terpadu.</p> <p>27. OPM-08-01; dated 20/03/2020; Weed Control – Pengendalian Gulma.</p>	
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		<p>28. OPM-09-01; dated 19/02/2019; 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 15/07/2019; The Use, Store and Discrad Pesticide – Penggunaan, Penyimpanan dan pemusnahan pestisida.</p> <p>31. OPM-10-01; dated 01/02/2018; Field Quality Control</p> <p>Interviews with the employees (harvester, spraying applicator, fertilizer applicator and EFB applicator) indicates satisfactory level of understanding and implementation in relation to their respective job function.</p> <p>Palm Oil Mill:</p> <p>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> </ol>	
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		<ol style="list-style-type: none"> <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> <li>24. POM-07-02-W06; Operating Thermal Deaerator.</li> <li>25. POM-07-02-W07; Boiler (Mech 35 MT/hr).</li> <li>26. POM-07-02-W08; Penanganan Gangguan Sumber Tidak Bergerak Steam Boiler – Handling disturbance from static Steam Boiler.</li> <li>27. POM-08-02-W01; Operating Genset.</li> <li>28. POM-09-02-W01; Operating Water Intake.</li> <li>29. POM-11-02-W01; Pengoperasian CPO Storage Tank – Operating CPO Storage Tank.</li> </ol>	
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		<p>30. POM-11-02-W02; Pengoperasian Kernel Bin Storage – Operating Kernel Bin Storage.</p> <p>31. Analisa FFA CPO No.POM-WI/LAB/001 – Analysing CPO’s FFA;</p> <p>32. Analisa FFA Kadar air untuk CPO dispatch No.POM-WI/LAB/002A – Analysing CPO’s moisture for CPO dispatch;</p> <p>33. Analisa kadar kotoran dan kadar air untuk kernel dipatch No.POM-WI/LAB/005A – Analyzing dirt and moisture in kernel for dispatch;</p> <p>34. Pengiriman CPO No.POM-WI/LAB/043 – Delivery of CPO;</p> <p>35. Pengiriman Kernel No.POM-WI/LAB/044 – Delivery of Kernel.</p> <p>A set of work instruction for mill’s workshop, 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, 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>	
3.3.2	A mechanism to check consistent implementation of procedures is in place.	The company has established mechanism to check consistent implementation of 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.	Complied

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<p>3.3.3</p>	<p>Records of monitoring and any actions taken are maintained and available.</p>	<p>Record of monitoring in Bukit Maradja POM are available under documents Action Plan Bukit Maradja POM as result Vice President Engineering (VPE) visit, e.g. based on visit 6 February 2020:</p> <ol style="list-style-type: none"> <li>1. There are a large number of old files that should be transferred to BP file store or if not required disposed of. Status: completed on 20 February 2020.</li> <li>2. The Mill Manager should make a plan to empty and clean both effluent tanks during the Iedul Fitri holiday. Status: completed on 22 May 2020.</li> <li>3. The old rusted steel gutter at the demain plant should be removed. Status: completed on 12 February 2020.</li> </ol> <p>Record of operation monitoring in Bukit Maradja Estate based on SEM (Senior Estate Manager) visit on 29 January 2021:</p> <ol style="list-style-type: none"> <li>1. Weeding for nursery will be routinely performed by spraying and weeding into polybag.</li> <li>2. Briefing will be conducted to manuring team, related staff conducted extra monitoring during manuring.</li> <li>3. Block check will be carry out for preparation of Giltrap line for compost application.</li> </ol> <p>Record of operation monitoring in Kerasaan Estate based on SFM (Senior Field Manager) on 27 January 2021:</p> <ol style="list-style-type: none"> <li>1. Team and staff structure continue to strengthen plantation operational activities.</li> <li>2. Actual production vs budget is less by 13.16% and compared to BBC by 10.04%. Immediately conduct a census of pinched fruit in the area to represent what percentage of normal fruit is. The pinched fruit should not be delivered to the mill, but must be loosed at the TPH first.</li> </ol>	<p>Complied</p>
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		<p>3. Immediately plan the circle and path spraying standard according to the mature upkeep program according to the budget in February 2021. Report to SFM the effectiveness level after the weedy fern spraying trial for up to 3 weeks.</p> <p>Record of operation monitoring in Timbang Deli Estate:</p> <ol style="list-style-type: none"> <li>1. Based on of PD and Directors TDI-VBS visit on 24 February 2021: dissemination to communities regarding prohibition of cattle entering TDE because it harms for oil palm; give permission for grassing at rubber area not in oil palm area; established cattle gride.</li> <li>2. Based on Agronomist visit on 14 February 2021: at Block 15B04, 16B03 &amp; 17B03. Recommendation: weed control at those blocks can be use herbicide, which previously using manual; increase planting of beneficial plant; release of natural predator (<i>Sycanus</i> sp.).</li> </ol> <p>Other record related operation monitoring and action taken in unit of certification is Internal Audit results and Management Review.</p> <p>Perlabian POM: The latest internal audit carried out on 14-16 January 2021, against RSPO P&amp;C 2018 Indonesia National Interpretation 2020. The internal auditor assessed Criteria 3.8 related to RSPO SCCS. Corrective action related to internal audit findings have been determined. Several recommendations observed as follows:</p> <ol style="list-style-type: none"> <li>1. Recommended to make a list of permits that is always updated if there are changes.</li> <li>2. Updated FFB supplier list and signed by Mill Manager.</li> </ol> <p>Latest Management Review in Bukit Maradja POM conducted on 16 February 2021. Management review has discussed:</p>	
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		<ol style="list-style-type: none"> <li>1. Results of internal audits; internal audit in Bukit Maradja POM conducted on 14 – 16 January 2021, by ENC RMO NS Team, summary of finding and corrective action have been documented in Visit Report ENC Team.</li> <li>2. Customer feedback: Based on review of customer feedback conducted by Marketing Department, there is no complaint related CPO and PK quality sold by Bukit Maradja POM.</li> <li>3. Process performance and product conformity. FFB processed in Bukit Maradja POM are coming from owned estates and sister companies which fall under certificate number RSPO 632266.</li> <li>4. Status of preventive and corrective actions. All finding discussed in this Management Review have been closed and attached in the minutes of management review.</li> <li>5. Follow-up actions from management reviews. Result of previous management review were always discussed, mostly regarding performance, target achievement and FFB quality.</li> <li>6. Changes that could affect the management system. There is no company policy that effect Bukit Maradja POM management system; based on Memorandum of Engineering Department No.234/HO-ENG/2020 dated 2 December 2020 stated that starting 1 January 2021 operation of weighbridge will be controlled by independent laboratory and all data entry related production to lintramax system will be handled by independent laboratory</li> <li>7. Recommendations for improvement: follow up process of welder license that postponed due to Pandemic Covid-19.</li> </ol> <p><b>Bukit Maradja Estate:</b>          Internal Audit performed 14-16 February 2021. Several recommendations observed as follows:</p>	
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		<ol style="list-style-type: none"> <li>1. Communicate with ENC-HO Medan to complete deep water analysis.</li> <li>2. Communicate with RMO-NS to follow up letter from Manpower office No.441-7/DTK/SU/WIL.III/2020 dated 16 September 2020 regarding Notification of SIO Issuance.</li> </ol> <p>Management review meeting in Bukit Maradja Estate held on 5 October 2020. Agenda: review internal audit results, customer feedback, process performance and product suitability, status of corrective and preventive actions, follow-up from previous management review meetings, changes that may affect the system and recommendations for improvement.</p> <p><b>Kerasaan Estate:</b> Internal Audit performed 3 – 8 August 2020. Several recommendations observed as follows:</p> <ol style="list-style-type: none"> <li>a. Give reasonable justification regarding increase of pesticide uses.</li> <li>b. Complete evidence related realization of integrated pest management.</li> <li>c. Conducted training of MSDS for spraying workers by considering Covid-19 protocol.</li> </ol> <p>Management review meeting in Kerasaan Estate held on 15 October 2020. Agenda: review internal audit results, customer feedback, process performance and product suitability, status of corrective and preventive actions, follow-up from previous management review meetings, changes that may affect the system and recommendations for improvement.</p>	
<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>			
3.4.1	<p><b>(C)</b> SEIA in new planting or operation including mills, is conducted independently and participatively by involving the affected stakeholders, inclusive of impact assessment from the smallholder/outgrower scheme (if any). The assessment is to be documented.</p>	<p>Environmental Document of PT. Timbang Deli Indonesia (Timbang Deli Estate) in form of "Upaya Pengelolaan Lingkungan and Upaya Pemantauan Lingkungan (UKL-UPL)", approved by Environmental Agency of Deli Serdang Regency as per No: APDL.P/325/VIII/2014</p>	Complied

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		<p>dated 6 August 2014. Area covering 972.19 Ha consist of Rubber crops and Oil Palm crops.</p> <p>In 2014, PT. Timbang Deli Indonesia in cooperation with "Fakultas Kehutanan Institut Pertanian Bogor" have prepared "Dokumen Laporan Social Impact Assessment (SIA)". The assessment team comprise of: Handian Purwawangsa, S.Hut, M.Si (Team Leader; Social and cultural expert); Udi Kusnidar, S.Hut (Social-economic-cultural expert); Ir. Heri Wiyono (Social and cultural expert).</p> <p>The result: PT. Timbang Deli Indonesia is administratively located in the District of Deli Serdang, Sub-District of Galang. The villages located around the licenced area are Timbang Deli, Keramat Gajah dan Jaharun A. All villages are reasonably distant from the district capital which was 4 km from Timbang Deli village, 7 km for Kramat Gajah village and only 1 km for Jaharun A village.</p> <p>From in-depth interviews and discussions, generally response from community for PT. Timbang Deli Indonesia is good, especially PT. Timbang Deli Indonesia already been there for quite a long time and most of villagers is employee or ever been employed or has relatives working at PT. Timbang Deli Indonesia or used to work at PT. Timbang Deli Indonesia. Community do not reject the existence of company in the area.</p> <p>Some social issues related with management PT. Timbang Deli Indonesia are latex and unplump theft, fires in the dry season, cattle grazing, limited land use for villagers, potential flooding from government's land that beside (outside) PT. Timbang Deli Indonesia which planted/used by villagers.</p> <p>The local communities expect some positive outcomes from the development of oil palm in PT. Timbang Deli Indonesia. Increase of employment opportunities, grazing for their cattles, participation in social villages activities, and fire woods. Besides that, with the</p>	
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		<p>development of PT. Timbang Deli Indonesia, villagers could have new opportunities to make their own business as employees of PT. Timbang Deli Indonesia need goods and services that the villagers can supply. PT. Timbang Deli Indonesia also allocated some of its land for the building of Kantor Desa Timbang Deli (office for the village’s administration purpose where the head of village and his/her staff work), and schools (SDN Timbang Deli and SMKN Galang). From the interviews with community, it is gathered that PT. Timbang Deli Indonesia give almost no negative impact.</p> <p>In 2017, PT. Timbang Deli Indonesia in cooperation with “Koompasia Enviro Institut” carried out social impact assessment as reported in” Laporan Analisa Dampak Sosial PT. Timbang Deli Indonesia tahun 2017”. The assessment team comprise of: Henry Marpaung (Team Leader; Social-cultural expert; ALS licensed assessor Provisional ALS160007HM); Harry Kurniawan, (Team member; GIS and landscape); Ridho Anggara (Team member, GIS assisstant).</p> <p><b>PT Eastern Sumatra Indonesia (Bukit Maradja POM &amp; Bukit Maradja Estate):</b></p> <p>Environmental Document for Composting Premise “Dokumen Evaluasi Lingkungan Hidup (DELH) Kebun Kelapa Sawit, PKS dan Pemanfaatan Janjang Kosong Kelapa Sawit Dengan Limbah Cair Untuk Diproses Menjadi Kompos di Kebun Bukit Maradja PT. Eastern Sumatra Indonesia”, June 2015.</p> <p>In PT. Eastern Sumatra Indonesia, environmental document titled “UKL – UPL” was approved “Keputusan Kepala Badan Pengendalian Dampak Lingkungan Daerah Kabupaten Simalungun No.188.4/70/Bpdl” related to finalized environmental and social feasibility at Palm oil mill of PT. Eastern Sumatera Indonesia (PT SIPEF), Bukit Maradja Estate, Simalungun District, North Sumatra Province dated on 26 February 2004 and last revision as in “Rencana Pengelolaan Lingkungan (RKL) dan Revisi Rencana Pemantauan Lingkungan (RPL)” with scope of study</p>	
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		<p>palm oil estate area 3,178 Ha and palm oil mill 30 Ton FFB/hour as stated in the "Keputusan Bapedalda Kabupaten Simalungun No.271/Bpdl/2008".</p> <p>The Organization also has prepared the environmental document as in "Dokumen Evaluasi Lingkungan Hidup (DELH) Kebun Kelapa Sawit PKS dan Pemanfaatan Janjang Kosong Kelapa Sawit dengan Limbah Cair untuk di Proses menjadi kompos di Kebun Bukit Maradja PT. Eastern Sumatra Indonesia". The document has approved per "Keputusan Kepala Badan Lingkungan Hidup Kabupaten Simalungun No.188.45/833/Sekrt-2015", dated 8 June 2015, with scope of study palm oil estate area 3,178 Ha location in N 03° 00' 45.0', E 099°14'08.0'.</p> <p>In 2010, company has prepared a social impact assessment, as reported under "Dokumen Sosial Impact Assessment – March 2010", in cooperation with Yayasan Sawit Berkelanjutan Indonesia (YASBI). In the preparation process, the social impact study involving multi stakeholder through guided interview, questionnaire, focus group discussion (FGD).</p> <p>- Kerasaan Estate (PT Kerasaan Indonesia) have the environmental document under "Dokumen Upaya Pengelolaan dan Pemantauan Lingkungan (UKL- UPL)" is comply with letter of "Kepala Bapedalda Kabupaten Simalungun No.442/Bpdl-2005 dated on 23 Desember 2005 related agreement of "Dokumen UKL/UPL PT. Kerasaan Indonesia" and revision of "Upaya Pengelolaan Lingkungan dan Upaya Pemantauan Lingkungan (UKL/UPL)" comply with letter agreement "Kepala Badan Lingkungan Hidup Kabupaten Simalungun No.700/109/BLH/2009" dated 8 April 2009 with scope of study 2,362 Ha oil palm estates. Within this UKL-UPL document also covered social aspect as the identification of social impact assessment.</p>	
3.4.2	For the unit of certification, a SEIA is available and social and environmental management plan and its monitoring have been developed with participation of affected stakeholders.	The company has prepared report on Environmental Management and Monitoring implementation (Laporan RKL-RPL) and submit to the government regularly (per semester).	Complied

		<p>The Management Plan incorporated in the "Rencana Pengelolaan Lingkungan", consist of:</p> <ul style="list-style-type: none"> <li>- Physical-chemical compenent/aspect: soil fertility (monitoring once per annum); water quality (monitoring twice per annum); air quality (monitoring twice per annum); aesthetic (cleanliness).</li> <li>- Social-economy-cultural component/aspects: community welfare; community perception.</li> <li>- Health component: community health, hazardous waste management;</li> </ul>																																																																
<p>3.4.3</p>	<p><b>(C)</b> The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in participatory way.</p>	<p>The social and environmental management and monitoring plan of PT. Eastern Sumatra Indonesia is implemented according to Environmental Document Directive, such as monitoring on surface water (Bah Bolon River and Serapuh River) within 2019 as below:</p> <table border="1" data-bbox="1133 831 1989 1273"> <thead> <tr> <th>parameter</th> <th>unit</th> <th>Bah Bolon Upstream</th> <th>Bah Bolon Downstream</th> <th>Serapuh Upstream</th> <th>Serapuh Downstream</th> <th>Threshold</th> </tr> </thead> <tbody> <tr> <td>TDS</td> <td>Mg/L</td> <td>300</td> <td>307</td> <td>192</td> <td>379</td> <td>1,000</td> </tr> <tr> <td>TSS</td> <td>Mg/L</td> <td>8.5</td> <td>19.5</td> <td>11.5</td> <td>21.5</td> <td>50</td> </tr> <tr> <td>pH</td> <td>Mg/L</td> <td>8.01</td> <td>8.14</td> <td>8.15</td> <td>8.12</td> <td>6-9</td> </tr> <tr> <td>BOD5</td> <td>Mg/L</td> <td>2.1</td> <td>2.64</td> <td>2.32</td> <td>2.86</td> <td>3</td> </tr> <tr> <td>COD</td> <td>Mg/L</td> <td>8.26</td> <td>9.98</td> <td>10.6</td> <td>13.7</td> <td>25</td> </tr> <tr> <td>DO</td> <td>Mg/L</td> <td>6.9</td> <td>5.8</td> <td>6.2</td> <td>5.42</td> <td>Min. 4</td> </tr> <tr> <td>Coliform</td> <td>Jml/100 mL</td> <td>4</td> <td>8</td> <td>7</td> <td>13</td> <td>5,000</td> </tr> <tr> <td>Oil &amp; Fat</td> <td>μ/L</td> <td>800</td> <td>833</td> <td>833</td> <td>700</td> <td>1,000</td> </tr> </tbody> </table> <p>Reviewed and updated regularly per semester (6 month basis) and reported to Environmental Agency.</p>	parameter	unit	Bah Bolon Upstream	Bah Bolon Downstream	Serapuh Upstream	Serapuh Downstream	Threshold	TDS	Mg/L	300	307	192	379	1,000	TSS	Mg/L	8.5	19.5	11.5	21.5	50	pH	Mg/L	8.01	8.14	8.15	8.12	6-9	BOD5	Mg/L	2.1	2.64	2.32	2.86	3	COD	Mg/L	8.26	9.98	10.6	13.7	25	DO	Mg/L	6.9	5.8	6.2	5.42	Min. 4	Coliform	Jml/100 mL	4	8	7	13	5,000	Oil & Fat	μ/L	800	833	833	700	1,000	<p>Complied</p>
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		<p>Besides, Environmental Management Plan also required some parameter such as:</p> <ul style="list-style-type: none"> <li>- physical-chemical component/aspect: soil fertility (monitoring once per annum); water quality (monitoring twice per annum); air quality (monitoring twice per annum); aesthetic (cleanliness).</li> <li>- Social-economy-cultural component/aspects: community welfare; community perception.</li> <li>- Health component: community health, hazardous waste management</li> </ul> <p>All these parameter implemented by unit of certification.</p>	
<p><b>Criteria 3.5:</b> A system for managing human resources is in place.</p>			
<p>3.5.1</p>	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives in accordance with the applicable regulation.</p>	<p>Recruitment/Selection/Hiring</p> <p>Company established SOP Internal Recruitment (SKU to Acting Field Assistant (FA), Mill Assistant (MA), Office Assistant (OA)) No.HRD-01-01/01-04-2019/Rev.1 effective date 5 April 2019. The objective to give equal career opportunity for every employee and ensure fulfilment of the required manpower needed. Operating Unit (OU) prepares Staff Employment Request (SER). General Manager (GM)/Regional Director (RD) approve or reject SER created by Operating Unit. President Director approve or reject recruitment based on the urgency and needs of the company. OU Manager select the best candidates from SKU based on SKU Evaluation. Training Manager conduct assessment program to select candidates. Human Resources Department Manager approve or reject candidate based on the assessment report. Candidate must go through evaluation phase for 6 months as Acting FA/MA/OA. After the evaluation phase, Manager gives evaluation report to GM/RD. GM/RD then decided whether to promote or decline candidate as staff.</p> <p>Company established SOP External Recruitment (Staff only) No.HRD-01-02/01-04-2019/Rev.1 effective date 16 April 2020. The objective to</p>	<p>Complied</p>

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		<p>ensure the process of recruiting new staff for all position is done and managed systematically, effectively, and efficiently based on the principle of job equality and implemented procedure. Regional Management Office (RMO) or Head of Department prepares Staff Employment Request (SER). President Director approve or reject SER based on the urgency and needs of the company. Office Assistant (OA) Recruitment carried out recruitment database except for special reason use advertising. After publishing recruitment advertisement, candidates resume are collected and select best candidates for selection process: written tes, physiological test, interview, medical checkup; choose candidate based on qualification/competence; crete interview with user schedule. Office Assistant responsible for offering contract and negotiations. President Director decide to the hiring of staff based on company needs. Newly hired staff is required to go through monitoring process for 3 months and manager is responsible for the monitoring period.</p> <p>Company established SOP Recruitment for PKWT/Free Labor(Non-Staff) No.HRD-01-03/09-03-2020/Rev.2 effective date 17 March 2020. The objective to ensure the recruitment process for labor force are according to valid procedure and approve manpower plan. Field Assistant (FA), Mill Assistant (MA), Office Assistant (OA) prepare a proposal for recruitment based on available budget, work experience, achievements. Estate Manager or Mill Manager check and approve the proposal. General Manager (GM)/Regional Director (RD) approve or reject SER created by Operating Unit. Upon approval, Office Head Assistant create work agreement signed by the employee and Estate Manager or Mill Manager.</p> <p>Promotion</p> <p>Company established SOP Promotion to SKU No.HRD-01-04/13-03-2020/Rev.0 effective date 12 May 2020. The objective to give confirmation and clarify in the process of promotion workers in companies. Estate Manager or Mill Manager prepare proposal for</p>	
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		<p>promotion and send to Regional Management Office (RMO). The process of submission attach: SKU evaluation form, list of duties and responsibilities, list of training attended, copy of ID card, copy of driver license. Senior Estate Manager (SEM) or Senior Technical Manager (STM) review and approve proposal. General Manager (GM)/Regional Director (RD) approve or reject proposal created by Operating Unit and forward to Head Of Department (HOD). Estate HOD or Technical HOD review and approve the proposal. Upon approval, HOD Human Resources then sign memorandum regarding promotion.</p> <p>Company established SOP Staff Appraisal No.HRD-03-03/17-06-2020/Rev.2 effective date 24 July 2020. The objective is part of performance management system to produce staff that enable company to achieve its strategic goals. Every year HOD Human Resources will notify all managers to do staff appraisal. OU Manager set each staff target for one year. Later on, the target which already set up will be KPI as base of staff appraisal evaluation. Manager will evaluate all the staff with 3 set of staff appraisal form (target achievement 60%, competence 40%, summary target + competence). HOD Human Resources doing a review of overall staff appraisal report made by Office Head Assistant Compensation before approve it. Board of Director approve or reject staff appraisal based on moderation meeting result.</p> <p>Retirement and termination refers to Collective Bargaining Agreement between company and the respective worker union. Company and worker union has collective bargaining agreement, in form of "Perjanjian Kerja Bersama". Each company has different agreement:</p> <p>PT. Eastern Sumatra Indonesia, PT. Kerasaan Indonesia and PT. Timbang Deli Indonesia have documented the pay and working condition in accordance to labour law (Undang-undang No.13 tahun 2003 tentang Ketenagakerjaan), as established under "Perjanjian Kerja Bersama (PKB) PT. Eastern Sumatra Indonesia dengan Pengurus Serikat</p>	
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		<p>Pekerja Bukit Maradja Mandiri (SPBMM) periode 2018-2020". This document available in Bahasa Indonesia.</p> <ul style="list-style-type: none"> <li>- Salary regulated under Chapter V;</li> <li>- Reasons for dismissal regulated under Chapter XXI;</li> <li>- Period of notice regulated under Chapter XXI;</li> <li>- Pension regulated under Chapter XVI;</li> <li>- Resolution upon industrial dispute on Chapter XXIII;</li> </ul>	
3.5.2	Employment procedures are implemented and records are maintained.	<p><u>Recruitment:</u></p> <ul style="list-style-type: none"> <li>- Bukit Maradja Estate carried out recruitment through Memorandum Estate Manager "Rekrutmen Karyawan No.10/BM-RMO/I/2020" dated 29 January 2020. The recruitment for 105 harvesters and 10 dump truck helper position. Application and recruitment document sighted: application letter, education certificate, copy of ID card, health certificate, other documentation – sighted for candidate Dedi Ramdani (harvester) and Ramlan (dump truck helper).</li> <li>- Bukit Maradja POM carried out recruitment for day worker PKWT through Memorandum Mill Manager "Rekrutmen Karyawan No.10/BM-RMO/I/2020" dated 9 May 2020. Job vacancy distributed to MARIHAT Bukit village. Application and recruitment document sighted: application letter, education certificate, copy of ID card, health certificate, other documentation – sighted for candidate Dedi Ramdani (harvester) and Ramlan (dump truck helper).</li> </ul> <p><u>Appointment of workers:</u></p> <ul style="list-style-type: none"> <li>- Bukit Maradja Estate obtains Letter for appointment based on Memorandum HR Department No.226/JWB-RMONS/IX/2020 dated 30 September 2020. Approved appointment for 3 employees: Rizki Alwanda (carpenter) from PKWT to SKU, Rapi Danu (carpenter) from PKWT to SKU, Ilah Kurnia Jannah (STC cooker) from PKWT to SKU.</li> </ul>	Complied

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		<p>The appointment status indicates all tribe, all sex eligible for promotion.</p> <ul style="list-style-type: none"> <li>- Bukit Maradja POM obtains Letter for appointment based on Memorandum HR Department No.043/JWB-BMM/II/2020 dated 28 February 2020 along with Labour Appraisal Form. Approved appointment for 10 employees from PKWT to SKU (permanent worker), effective 1 March 2020. The appointment status indicates all tribe, all sex eligible for promotion.</li> </ul> <p><u>Promotion:</u></p> <ul style="list-style-type: none"> <li>- Bukit Maradja Estate obtains Letter for promotion based on Memorandum HR Department No.170/JWB-RMONS/VII/2020 dated 29 July 2020. Approved promotion for 28 employees; sample: Anda Adi Utama (Payroll clerk) from P3 to P5, Armanto (54 years, harvest supervision) from Q1 to Q2P, Octavianus Karo-karo (Tractor Driver) from P2 to P3. The promotion status indicates all tribe, all sex, all ages are eligible for promotion.</li> <li>- Kerasaan Estate obtains Letter for promotion based on Memorandum Kerasaan Estate Manager dated 13 October 2020. Approved promotion for Wahyudi (Payroll clerk) from P2 to P3, Armanto (54 years, harvest supervision) from Q1 to Q2P, Octavian. The promotion status indicates all tribe, all sex, all ages are eligible for promotion.</li> </ul> <p><u>Treatment for contract worker:</u></p> <ul style="list-style-type: none"> <li>- "Perjanjian Kerja Waktu Tertentu Mukisa dan PT. Eastern Sumatra Indonesia Bukit Maradja Estate", signed on 2 January 2021. The PWKT stipulates: Clause 1: PKWT for Mukisa as general worker; PKWT period 1 January 2021 – 30 June 2021 (6 months). Clause 4: Salary paid per month, equal to UMP/UMSP/UMK/UMSK applicable to the company Rp. 2,607,089. Clause 5: Company provides medical treatment for employee as per regulation. Clause 7: Company will register employee to Jamsostek.</li> </ul>	
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		<ul style="list-style-type: none"> <li>- "Perjanjian Kerja Waktu Tertentu Ziko Angga Nandika dan PT. Eastern Sumatra Indonesia Bukit Maradja POM", signed on 1 August 2020. The PWKT stipulates: Clause 1: PKWT for Ziko ANgga Nandika as Cleaning Service; PKWT period 1 August 2020 – 31 July 2021 (12 months). Clause 4: Salary paid per month, equal to UMP/UMSP/UMK/UMSK applicable to the company Rp. 2,607,089. Clause 5: Company provides medical treatment for employee as per regulation. Clause 7: Company will register employee to Jamsostek.</li> <li>- "Perjanjian Kerja Waktu Tertentu Susanti dan PT. Kerasaan Indonesia Kerasaan Estate", signed on 1 June 2020. The PWKT stipulates: Clause 1: PKWT for Susanti as Loose Fruit Collection Supervisor; PKWT period 1 June 2020 – 30 May 2021 (12 months), working hour 7 hours per day. Clause 4: Salary paid per month, equal to UMP/UMSP/UMK/UMSK applicable to the company Rp. 2,607,089. Clause 5: Company provides medical treatment for employee as per regulation. Clause 8: Company will register employee to Jamsostek.</li> <li>- "Perjanjian Kerja Waktu Tertentu Era Mayer Dwi Putri dan PT. Timbang Deli Indonesia", signed on 1 February 2021. The PWKT stipulates: Clause 1: PKWT for Era Mayer Dwi Putri as kindergarten teacher; PKWT period 1 February 2021 – 31 January 2022 (12 months). Clause 4: Salary paid per month, equal to UMP/UMSP/UMK/UMSK applicable to the Deli Serdang of Rp. 3,188,592. Clause 6: Company provides medical treatment for employee as per regulation. Clause 8: Company will register employee to Jamsostek.</li> </ul> <p><u>Pension:</u></p> <ul style="list-style-type: none"> <li>- Bukit Maradja Estate paid pension for employee under name Wiwik Anjani and Santuso, dated 22 December 2020.</li> <li>- Kerasaan Estate paid pension for employee under name Fadlan, as per "Surat Persetujuan Bersama No.07/SPB/Pensiun/KRE/2020"</li> </ul>	
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		<p>dated 26 September 2020. The agreement stipulates the worker pension effective 1 October 2020, the pension fund will be paid to worker account, company housing will be empty on 1 January 2021. Pension fund paid on 26 September 2020.</p> <ul style="list-style-type: none"> <li>- Bukit Maradja POM paid pension for employee under name Selamat Purba, as per "Surat Persetujuan Bersama No.14/SPB/Pensiun/BMM/2020" dated 6 July 2020. The agreement stipulates the worker pension effective 1 August 2020, the pension fund will be paid to worker account, company housing will be empty on 1 November 2020.</li> </ul>	
<p><b>Criteria 3.6:</b> An Occupational health and safety (H&amp;S) plan is documented, effectively communicated and implemented.</p>			
<p>3.6.1</p>	<p><b>(C)</b> All operational activities risks assessed to identify the H&amp;S issues. Mitigation plans and procedures are documented and implemented.</p>	<p>PT Timbang Deli Indonesia has shown the procedure of hazards identification and risk assessment, no document SOP/TDI/03 version 01 issued dated 1 March 2019.</p> <p>PT Eastern Sumatera 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>Timbang Deli Estate -The document of risk assessment under "Penilaian Resiko", last review on 2 March 2020, the document was covered all activities in estate, such as: spraying, manuring, office activity, workshop, harvesting, pruning, - transport TBS.</p> <p>Bukit Maradja POM - The document of risk assessment under "Penilaian Resiko", last review on 15 January 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, godown, office, Temporary hazardous storage, effluent,</p>	<p>Complied</p>

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		<p>bunker filling, control room, telescopic handler, wheel loader, emplacement.</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>	
3.6.2	<p><b>(C)</b> The effectiveness of the H&amp;S plan to address health and safety risks to people is monitored.</p>	<p>PT Eastern Sumatra Indonesia have established an Occupational Health and Safety Policy No.QMM-40-01-P04/27-03/2019/Rev.1 signed by President Director dated 27 March 2019. In point 1 mentioned the company support the implementation of all relevant laws and regulation of Republic of Indonesia and 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: OHS-01-01</li> <li>- Procedure of Hot Work – No. OHS-01-02</li> <li>- Procedure of Potential Hazard Report – No. OHS-01-03</li> <li>- Procedure of 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> </ul>	Complied

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		<ul style="list-style-type: none"> <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 2021”, updated on 2 February 2021, 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 (Bakortiba)</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>Implementation of OHS monitoring at Bukit Maradja POM through the periodic inspection, such as:</p> <ul style="list-style-type: none"> <li>- Monitoring fire extinguisher (APAR) on February 2021. Station: Compost Plant. Monitoring conducted on 27 Feb 2021. Aspect to be monitored are hose, nozzle, tube pressure, fitting and seal.</li> <li>- Monitoring Hydrant on 30 January 2021. Totally 5 Hydrant are installed at the Mill: Sterilizer Station, Chainman Station, Kernel Station, Under Fibre Station, Engine Room Station.</li> <li>- Monitoring of Emergency Equipment on 27 Feb 2021. Location: Workshop, High Speed Diesel Oil, Clarification.</li> </ul> <p>Since 10 March 2020, periodic monitoring in form of training and awareness was postponed due to COVID-19 pandemic.</p>	
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<b>Criteria 3.7:</b> All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.			
3.7.1	<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 P&amp;C Principles, in a form they understand and includes assessment of the training.</p>	<p>PT Eastern Sumatra Indonesia – Bukit Maradja POM Program Training 2021.</p> <ul style="list-style-type: none"> <li>- RSPO/ISPO/Supply Chain (new employee). Plan: Oct 2021; Actual: 6 and 22 February 2021.</li> <li>- First Aid Training (all employee). Plan: February 2021; Actual: 1 February 2021.</li> <li>- MSDS Training (Warehouse, WTP Operator). Plan: February 2021; Actual: 11 February 2021.</li> <li>- Emergency Response Training (all employee). Plan: February 2021; Actual: 1 February 2021.</li> </ul> <p>PT Timbang Deli (Timbang Deli Estate) has training program in 2021, however some training not implemented due to Covid-19 pandemic are still occurs. An actual training or awareness that provided by Estate, such as:</p> <ul style="list-style-type: none"> <li>- Pesticides management and MSDS awareness on 29 January 2021.</li> <li>- First Aid awareness on 11 February 2021</li> <li>- Spraying tools calibration awareness on 29 February 2021</li> <li>- HCV Area Management awareness on 2 March 2021</li> </ul>	Complied
3.7.2	<p>Records of training are maintained, where appropriate on an individual basis.</p>	<p>Based on interview with sample of worker at Bukit Maradja Mill, Bukit Maradja Estate and Kerasaan Estate, it is clear that the workers obtain the general and specific training and awareness according their job description.</p> <p>Record of training has shown for an individual basis as per document of "Employee Training and Education Record", e.g:</p> <p><b>Bukit Maradja Mill:</b>  Name: Mr. Mesman Kurniawan (Effluent Operator).</p>	Complied



		<ul style="list-style-type: none"> <li>- 3 Jan 2020: OHS Policy Awareness.</li> <li>- 17 Feb 2020: PPE awareness.</li> <li>- 29 Feb 2020: Awareness on Emergency Response.</li> <li>- 05 Mar 2020: HIRADC Awareness.</li> </ul> <p>Name: Mr. R. Muhajir (Warehouse Officer).</p> <ul style="list-style-type: none"> <li>- 3 Jan 2020: OHS Policy Awareness.</li> <li>- 17 Feb 2020: PPE awareness.</li> <li>- 29 Feb 2020: Awareness on Emergency Response.</li> <li>- 05 Mar 2020: HIRADC Awareness.</li> <li>- 18 May 2020: Refreshment training on Work Instruction and HIRADC.</li> </ul> <p><b>Bukit Maradja Estate:</b></p> <p>Name: Mr. Budi Ariawan (Pest &amp; Disease employee and responsible PIC for Domestic Waste at Division 2)</p> <ul style="list-style-type: none"> <li>- 14 Mar 2018: Awareness of Aspect Impact.</li> <li>- 04 Feb 2019: Awareness of Code of Conduct Policy.</li> <li>- 12 Feb 2019: Awareness of Whistleblowing Policy.</li> <li>- 17 Jan 2019: Training on OHS for Manuring Spreader.</li> <li>- 02 Nov 2019: Awareness of HIRADC.</li> <li>- 19 May 2020: Refreshment training on Pest &amp; Disease.</li> </ul> <p><b>Kerasaan Estate:</b></p> <p>Name: Mrs. Riani (Manuring)</p> <ul style="list-style-type: none"> <li>- 04 Jul 2019: Training Manuring Manual.</li> <li>- 07 Feb 2020: Awareness of Corona Virus.</li> <li>- 05 Sep 2020: Awareness of Harvesting on Electricity Line.</li> <li>- 01 Feb 2021: Training on Manuring Manual.</li> </ul>	
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		<p>Name: Mrs. Enika Porida (Spraying)</p> <ul style="list-style-type: none"> <li>- 23 Mar 2019: Awareness of Risk Analysis.</li> <li>- 10 Jul 2019: Training on circle and path spraying.</li> <li>- 14 Jan 2020: Awareness of Safety Alert.</li> <li>- 03 Okt 2020: Awareness on Domestic Waste Management.</li> </ul> <p><b>Timbang Deli Estate:</b></p> <p>Name: Mr. Joko Susilo (Spraying Foreman)</p> <ul style="list-style-type: none"> <li>- Pesticides management and MSDS awareness on 29 January 2021.</li> <li>- First Aid awareness on 11 February 2021</li> <li>- Spraying tools calibration awareness on 29 February 2021</li> <li>- HCV Area Management awareness on 2 March 2021</li> </ul> <p>Name: Mr. Sugito (Workshop Foreman)</p> <ul style="list-style-type: none"> <li>- 22 Feb 2020: MSDS Awareness</li> <li>- 16 Feb 2021: Fire Drill</li> <li>- 11 Feb 2021: First Aid Awareness</li> <li>- 18 Feb 2021: Safety Vehicle Awareness</li> </ul>	
<p>3.7.3</p>	<p>Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.</p>	<p>Training Program 2021 is available including RSPO Supply Chain. The latest refresh training of supply chain conducted on 9 March 2021. The training subjected to SOP of Supply Chain and Traceability of Palm products (MKT-03-06/04-03-2019/Rev.0) and RSPO Principles &amp; Criteria 2018 that contain supply chain requirement. Training attended by relevant personnel including Mill Manager, Office Assistant, Field Assistant, weighbridge clerk, production clerk and security. Dissemination of supply chain requirement also performed to contracted transporter, e.g Sejahtera Abadi on 9 March 2021.</p>	<p>Complied</p>
<p><b>Criteria 3.8:</b> Supply chain requirements for mills.</p>			

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Procedure note: all requirements are classified as <b>Critical Indicators</b> . However it will not contribute to suspension if there is more than 5 non-compliance within a principle)			
3.8.1	<p><b>Identity Preserved Module</b></p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&amp;C), or against the Group Certification scheme.</p> <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.</p>	<p>Management decided Bukit Maradja POM, PT Eastern Sumatera Indonesia to implement RSPO Supply Chain Model Identity Preserved. With the implementation of Supply Chain Model Identity Preserved, the Palm Oil Mill only received and process FFB from certified company-owned estate. FFB suppliers of Bukit Maradja POM are Bukit Maradja Estate, Kerasaan Estate and Timbang Deli Estate.</p> <p>Bukit Maradja 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, Receiving and shipping of CPO. Person responsible for implementation of RSPO Supply Chain standard at the POM is the Mill Manager.</p>	Complied
3.8.2	<p><b>Mass Balance Module</b></p> <p>A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	<p>Management decided Bukit Maradja POM, PT Eastern Sumatera Indonesia to implement RSPO Supply Chain Model Identity Preserved. With the implementation of Supply Chain Model Identity Preserved, the Palm Oil Mill only received and process FFB from certified company-owned estate. FFB suppliers of Bukit Maradja POM are Bukit Maradja Estate, Kerasaan Estate and Timbang Deli Estate.</p> <p>Not applicable.</p>	Not Applicable
3.8.3	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&amp;C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p>	<p>The 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. Bukit Maradja POM received certified raw material (Fresh Fruit Bunch) from its own estate, Bukit Maradja Estate and from sister company Kerasaan Estate (PT Kerasaan Indonesia) and Timbang Deli Estate (PT Timbang Deli Indonesia).</p>	Complied

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3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	Bukit Maradja Palm Oil Mill has been registered in RSPO IT Platform with registered ID number RSPO_PO1000000095. The mill also has registered all transaction in RSPO IT Platform.	Complied
3.8.5	<p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> <li>a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</li> <li>b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</li> <li>c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill's procedures for the implementation of this standard.</li> <li>d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill.</li> </ul>	<p>PT Eastern Sumatra Indonesia 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. Procedure completed with the flow diagram of FFB receiving, processing in POM, Receiving and shipping of CPO. Person responsible for implementation of RSPO Supply Chain standard at the POM is the Mill Manager. The procedure is complete and up to date covering the implementation of all elements in the supply chain requirements, such as:</p> <ul 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> <li>d. Evaluation by CB.</li> <li>e. Transportation records.</li> <li>f. Internal control.</li> <li>g. Contractor control.</li> </ul> <p>The mill only receives and process certified FFB, therefore the procedure for receiving and processing non-certified FFB is not applicable.</p> <p>The mill has complete and up to date records and reports that demonstrated compliance with the Identity Preserved requirements including training records. Record seen data of FFB received, CPO and</p>	Complied

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		<p>PK stock, production, dispatch, OER, KER, refreshment training of RSPO Supply Chain on 9 March 2021, attended by relevant personnel including Mill Manager, Office Assistant, Field Assistant, weighbridge clerk, production clerk and security.</p> <p>Available records and report that demonstrated compliance with the RSPO supply chain requirement, e.g. Daily Production Figure for 31 December 2020: FFB received month todate is 7,399.41 MT; year todate is 121,660.31 MT. CPO produced month todate is 1,717.65 MT; year todate is 28,427.27 MT. PK produced month todate is 345,81 MT; year todate is 5,977.86 MT. OER month todate is 22.65%; year todate is 23.40%. KER month todate is 4.56%; year todate is 4.91%. CPO dispatched month todate is 1,454.07 MT; year todate is 28,333.45 MT. PK dispatched month todate is 300.04 MT; year todate is 5,976.13 MT.</p> <p>Daily Production Figure for 15 March 2021: FFB received month todate is 4,969.71 MT; year todate is 20,257.08 MT. CPO produced month todate is 1,156.73 MT; year todate is 4,690.81 MT. PK produced month todate is 241.57 MT; year todate is 993.18 MT. OER month todate is 23.48%; year todate is 23.17%. KER month todate is 4.90%; year todate is 4.9%. CPO dispatched month todate is 1,170.76 MT; year todate is 5,010.30 MT. PK dispatched month todate is 78.05 MT; year todate is 865.14 MT.</p> <p>Monthly production report is available containing records of FFB received by Bukit Maradja POM from Bukit Maradja Estate, Kerasaan Estate and Timbang Deli Estate. All FFB received by Bukit Maradja POM are certified. The record contains CPO and PK production, dispatch and stocks. Extraction rate of CPO and PK are recorded as well.</p>	
3.8.6	<p>Internal Audit</p> <p>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill;</p>	<p>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. Section 6. Frequency and Timing stipulates the internal audits are conducted at least once a year according to the standards referred to. Section 5.4</p>	Complied

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	<p>a) Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>b) Effectively implements and maintains the standard requirements within its organisation.</p> <p>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p>	<p>Implementation of Routine/Internal Audit Visits stipulates: 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.</p> <p>The latest internal audit carried out on 14-16 January 2021, against RSPO P&amp;C 2018 Indonesia National Interpretation 2020. The internal auditor assessed Criteria 3.8 related to RSPO SCCS. Corrective action related to internal audit findings have been determined.</p> <p>Latest Management Review in Bukit Maradja POM conducted on 16 February 2021. Management review has discussed:</p> <ul style="list-style-type: none"> <li>• Results of internal audits; internal audit in Bukit Maradja POM conducted on 14 – 16 January 2021, by ENC RMO NS Team, summary of finding and corrective action have been documented in Visit Report ENC Team.</li> <li>• Customer feedback: Based on review of customer feedback conducted by Marketing Department, there is no complaint related CPO and PK quality sold by Bukit Maradja POM.</li> <li>• Process performance and product conformity. FFB processed in Bukit Maradja POM are coming from owned estates and sister companies which fall under certificate number RSPO 632266.</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.</li> </ul>	
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		<ul style="list-style-type: none"> <li>• Follow-up actions from management reviews. Result of previous management review were always discussed, mostly regarding performance, target achievement and FFB quality.</li> <li>• Changes that could affect the management system. There is no company policy that effect Bukit Maradja POM management system; based on Memorandum of Engineering Department No.234/HO-ENG/2020 dated 2 December 2020 stated that starting 1 January 2021 operation of weighbridge will be controlled by independent laboratory and all data entry related production to lintramax system will be handled by independent laboratory</li> </ul> <p>Recommendations for improvement: follow up process of welder license that postponed due to Pandemic Covid-19.</p>	
<p>3.8.7</p>	<p>Purchasing and Goods In</p> <p>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>	<p>PT Eastern Sumatra Indonesia – Bukit Maradja POM has ensured that certified FFB received are RSPO certified based on the source of FFB. These FFB source are certified under PT Eastern Sumatra Indonesia – Bukit Maradja POM certificate (RSPO 632266). Based on interview with weighbridge clerk and FFB receiving station, Bukit Maradja POM only received certified FFB from sustainable source, that is Bukit Mardja Estate; Kerasaan Estate and Timbang Deli Estate. There is no FFB received from other source.</p> <p>The unit of certification 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 explains Operating Unit can coordinate to an evaluation with CB about the quota between the OU and the CB (projected</p>	<p>Complied</p>

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		<p>overproduction). During this annual surveillance assessment, Bukit Maradja POM was not over sold the CPO and PK production.</p> <p>The procedure 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 person is Operating Unit Manager and Senior Manager Marketing. Based on audit, Bukit Maradja POM only receive and processed sustainable FFB. There has been no complaint from buyer.</p> <p>Records of purchasing goods in available:</p> <ul style="list-style-type: none"> <li>- Delivery of FFB from Field "SPB" No.02/SM/F4/2021 dated 1 March 2021 from Bukit Maradja Estate, Division F3, block 17C02A; planting year 2017, total 1153 bunches. Stamp Sustainable Product-IP. Receiving slip/weighbridge ticket No.FFB21002708W; Truck BK 9568 TO; Bukit Maradja Estate dated 1 March 2021; D/O No.02/SM/F4/2021; block ID 17C02A; planting year 2017; total bunches 1153; nett weight 6,180 kg. Stamp Sustainable Product-IP.</li> <li>- Delivery of FFB from Field "SPB" No.KRE/205 dated 1 March 2021 from Kerasaan Estate, Division F1, Block G04; 283 bunches; planting year 1997; Stamp Sustainable Product-IP. Receiving slip/weighbridge ticket No.FFB2100272W; Truck BK 9859 EP; Kerasaan Estate dated 1 March 2021; D/O No.KRE/205; Block ID 97G04; Division F2 planting year 1997; total bunches 283; nett weight 6,810 kg. Stamp Sustainable Product-IP.</li> <li>- Delivery of FFB from Field "SPB" No.43/III/TDE/21 dated 15 March 2021 from Timbang Deli Estate, Division Oil Palm, Block 17B03 (1009 bunches), 17C01 (268 bunches) and 17B02 (199 bunches); total 1,976 bunches; planting year 2017; Stamp Sustainable Product-IP. Receiving slip/weighbridge ticket No.FFB21003452W; Truck BK 8929 ES; Timbang Deli Estate dated 15 March 2021; D/O</li> </ul>	
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		<p>No.43/III/TDE/21; 17B03 (1009 bunches), 17C01 (268 bunches) and 17B02 (199 bunches); Division Oil Palm, planting year 2017; total bunches 1,976 bunches; nett weight 7,010 kg. Stamp Sustainable Product-IP.</p> <ul style="list-style-type: none"> <li>- Delivery of FFB from Field "SPB" No.84/XII/TDE/20 dated 30 December 2020 from Timbang Deli Estate, Division Oil Palm, Block 16D01; 936 bunches; planting year 2016; Stamp Sustainable Product-IP. Receiving slip/weighbridge ticket No.FFB20018900W; Truck BK 9388 EI; Timbang Deli Estate dated 30 December 2020; D/O No.84/XII/TDE/20; Block ID 16D01; Division 01, planting year 2016; total bunches 938; nett weight 7,270 kg. Stamp Sustainable Product-IP.</li> <li>- Daily Production Figure for 31 December 2020: FFB received month todate is 7,399.41 MT; year todate is 121,660.31 MT, consist of Bukit Maradja Estate: month todate is 3,769.68 MT; year todate is 64,448.68 MT; from Kerasaan Estate: month todate is 3,329.76 MT; year todate is 54,803.75 MT; from Timbang Deli Estate: month todate is 229.97 MT; year todate is 2,407.88 MT.</li> </ul>	
<p>3.8.8</p>	<p><b>Sales and Goods Out</b></p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ol style="list-style-type: none"> <li>a) The name and address of the buyer;</li> <li>b) The name and address of the seller;</li> <li>c) The loading or shipment / delivery date;</li> <li>d) The date on which the documents were issued;</li> </ol>	<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><b>CSPO</b></p> <ul style="list-style-type: none"> <li>- Contract No.2020/LTC-CPO/ESI/44 dated 23 October 2020; between Seller: PT Eastern Sumatra Indonesia (address Gedung Forum Nine Lt.10, Suite 1-11, Jl. Imam Bonjol No.9 Petisah Tengah, Medan Petisah, Kota Medan Sumatera Utara - 20112) and Buyer: PT SMART Tbk (address Sinar Mas Land Plaza Menara 2 Lt.28-30, Jl. MH Thamrin No.51, Gondangdia, Menteng, Jakarta Pusat); for sales of 500 MT</li> </ul>	<p>Complied</p>

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	<p>e) RSPO certificate number;</p> <p>f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations);</p> <p>g) The quantity of the products delivered;</p> <p>h) Any related transport documentation;</p> <p>i) A unique identification number.</p>	<p>Crude Sustainable Palm Kernel – RSPO IP; Certificate No. RSPO 632266.</p> <ul style="list-style-type: none"> <li>- Delivery Order No.2020/ESI-CPO/LTC/DO/112 dated 15 December 2020, ordering shipment of 250 MT CPO – RSPO IP, from PT Eastern Sumatra Indonesia – Loko PKS Bukit Maradja to buyer PT SMART Tbk at Jl. Belmera Baru III, Belawan II, Belawan.</li> <li>- Delivery Order No.2020/ESI-CPO/LTC/DO/113 dated 21 December 2020, ordering shipment of 250 MT CPO – RSPO IP, from PT Eastern Sumatra Indonesia – Loko PKS Bukit Maradja to buyer PT SMART Tbk at Jl. Belmera Baru III, Belawan II, Belawan.</li> <li>- There are 23 Dispatch Slip which refer to DO No.2020/ESI-CPO/LTC/DO/112, consist of: CPO20001031W, CPO20001032W, CPO20001033W, CPO20001034W, CPO20001035W, CPO20001036W, CPO20001037W, CPO20001038W, CPO20001039W, CPO20001040W, CPO20001048W.</li> <li>- Dispatch Slip No.CPO20001036W, dated 16/12/2020; from PT Eastern Sumatra Indonesia – Bukit Maradja POM; to PT SMART Tbk; product Crude Palm Oil; quantity 25.99 MT; DO No.2020/ESI-CPO/LTC/DO/112; Contract No. 2020/LTC-CPO/ESI/44; Certificate RSPO 632266; Module Sustainable Product IP; Vehicle ID No. BK 8210 CK; Transporter CV Sejahtera Abadi.</li> <li>- Shipping Announcement, with transaction ID No. TR-2ff7a535-6ba4 for 15.08 MT CSPO IP; from Bukit Maradja POM PT Eastern Sumatra Indonesia (RSPO_PO100000095) as Seller to PT SMART Tbk – Belawan Refinery (RSPO_PO1000000970) as Buyer. Shipping date 08-12-2020; Contract 2020/LTC-CPO/ESI/44; Confirmation date 09-03-2021.</li> <li>- Shipping Announcement, with transaction ID No. TR-29b323d0-7b71 for 484.07 MT CSPO IP; from Bukit Maradja POM PT Eastern Sumatra Indonesia (RSPO_PO100000095) as Seller to PT SMART Tbk –</li> </ul>	
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		<p>Belawan Refinery (RSPO_PO1000000970) as Buyer. Shipping date 31-12-2020; Contract 2020/LTC-CPO/ESI/44; Confirmation date 27-01-2021.</p> <p>Detail Information available:</p> <ul style="list-style-type: none"> <li>• The name and address of the buyer: PT SMART Tbk, address Sinar Mas Land Plaza Menara 2 Lt.30, Jl. MH Thamrin No.51, Gondangdia, Menteng, Jakarta Pusat.</li> <li>• The name and address of the seller: PT Eastern Sumatra Indonesia, address Gedung Forum Nine Lt.10, Suite 1-11, Jl. Imam Bonjol No.9 Petisah Tengah, Medan Petisah, Kota Medan 20112.</li> <li>• The loading or shipment / delivery date: 16 December 2020 based on Dispatch Slip.</li> <li>• The date on which the documents were issued: Contract on 23 October 2020; DO on 15 December 2020 and 21 December 2020; Dispatch Slip on 16 December 2020;</li> <li>• A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations): CSPO RSPO IP notation on all mill records;</li> <li>• The quantity of the products delivered: 250 MT based on each DO; from sampled dispatch slip: 25.99 MT of CSPO;</li> <li>• Any related transport documentation: vehicle ID No. BK 8210 CK by CV Sejahtera Abadi.</li> <li>• Supply chain certificate number of the seller: RSPO 632266.</li> <li>• A unique identification number: Contract No.2020/LTC-CPO/ESI/44 (verified on all record).</li> </ul> <p><b>PK.</b></p> <ul style="list-style-type: none"> <li>- Contract No.2020/LTC-PK/BM/10 dated 26 August 2020; between Seller: PT Eastern Sumatra Indonesia (address Gedung Forum Nine Lt.10, Suite 1-11, Jl. Imam Bonjol No.9 Petisah Tengah, Medan Petisah, Kota Medan Sumatera Utara - 20112) and Buyer: PT SMART</li> </ul>	
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		<p>Tbk (address Sinar Mas Land Plaza Menara 2 Lt.30, Jl. MH Thamrin No.51, Gondangdia, Menteng, Jakarta Pusat); for sales of 550 MT Crude Sustainable Palm Kernel – RSPO IP; Certificate No. RSPO 632266.</p> <ul style="list-style-type: none"> <li>- Delivery Order No.2020/LTC-PK/BM/DO/11 dated 1 September 2020, ordering shipment of 600 MT PK – RSPO IP, from PT Eastern Sumatra Indonesia – Loko PKS Bukit Maradja to buyer PT SMART Tbk.</li> <li>- “Instruksi Pengambilan Barang” No.149/SMART-IPB/L/11/20 dated 5 Nov 2020 issued by PT SMART Tbk to CV Sawita Sejahtera Logistic, regarding shipping instruction of Palm Kernel based on DO No.2020/LTC-PK/BM/DO/11.</li> <li>- There are 25 Dispatch Slip which refer to DO No.2020/LTC-PK/BM/DO/11, consist of PK20000212W, PK20000213W, PK20000214W, PK20000215W, PK20000216W, PK20000217W, PK20000218W, PK20000219W, PK20000220W, PK20000221W, PK20000222W, PK20000223W, PK20000224W, PK20000225W, PK20000226W, PK20000227W, PK20000228W, PK20000229W, PK20000230W, PK20000231W, PK20000232W, PK20000233W, PK20000234W, PK20000235W, PK20000236W.</li> <li>- Dispatch Slip No.PK20000212W, dated 07/11/2020; from PT Eastern Sumatra Indonesia – Bukit Maradja POM to PT SMART Tbk; product Palm Kernel; quantity 26.11 MT; No.2020/LTC-PK/BM/DO/11; Contract No. No.2020/LTC-PK/BM/10; Certificate RSPO 632266; Module Sustainable Product IP; Vehicle ID No. BK 8751 DQ; CV Sawita Sejahtera Logistic.</li> <li>- Shipping Announcement, with transaction ID No. TR-8e31ec18-f63a for 426.84 MT CSPK IP; from PT Eastern Sumatra Indonesia – Bukit Maradja POM (RSPO_PO1000000099) as Seller to PT SMART Tbk (RSPO_PO1000006555) as Buyer. Shipping date 30-11-2020; Contract 2020/LTC-PK/BM/10; Confirmation date 07-12-2020.</li> </ul>	
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		<ul style="list-style-type: none"> <li>- Shipping Announcement, with transaction ID No. TR-4f46cffd-8de7 for 173.16 MT CSPK IP; from PT Eastern Sumatra Indonesia – Bukit Maradja POM (RSPO_PO1000000099) as Seller to PT SMART Tbk (RSPO_PO1000006555) as Buyer. Shipping date 31-12-2020; Contract 2020/LTC-PK/BM/10; Confirmation date 11-01-2021.</li> <li>- Contract No.2020/LTC-PK/BM/08 dated 26 August 2020; between Seller: PT Eastern Sumatra Indonesia (address Gedung Forum Nine Lt.10, Suite 1-11, Jl. Imam Bonjol No.9 Petisah Tengah, Medan Petisah, Kota Medan Sumatera Utara - 20112) and Buyer: PT SMART Tbk (address Sinar Mas Land Plaza Menara 2 Lt.30, Jl. MH Thamrin No.51, Gondangdia, Menteng, Jakarta Pusat); for sales of 550 MT Crude Sustainable Palm Kernel – RSPO IP; Certificate No. RSPO 632266.</li> <li>- Delivery Order No.2020/LTC-PK/BM/DO/09 dated 1 September 2020, ordering shipment of 550 MT PK – RSPO IP, from PT Eastern Sumatra Indonesia – Loko PKS Bukit Maradja to buyer PT SMART Tbk.</li> <li>- “Instruksi Pengambilan Barang” No.126/SMART-IPB/L/09/20 dated 2 Sep 2020 issued by PT SMART Tbk to UD Serbaguna, regarding shipping instruction of Palm Kernel based on DO No.2020/LTC-PK/BM/DO/09.</li> <li>- There are 23 Dispatch Slip which refer to DO No.2020/LTC-PK/BM/DO/09, consist of PK20000169W, PK20000170W, PK20000171W, PK20000172W, PK20000173W, PK20000174W, PK20000175W, PK20000176W, PK20000177W, PK20000178W, PK20000179W, PK20000180W, PK20000181W, PK20000182W, PK20000183W, PK20000184W, PK20000185W, PK20000186W, PK20000187W, PK20000188W, PK20000189W, PK20000190W, PK20000192W.</li> <li>- Dispatch Slip No.PK20000172W, dated 10/09/2020; from PT Eastern Sumatra Indonesia – Bukit Maradja POM; product Palm Kernel;</li> </ul>	
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		<p>quantity 26.89 MT; DO No.2020/LTC-PK/BM/DO/09; Contract No.2020/LTC-PK/BM/08; Certificate RSPO 632266; Module Sustainable Product IP; Vehicle ID No. BK 9732 BJ; Transporter CV Sawita Sejahtera Logistic.</p> <ul style="list-style-type: none"> <li>- Shipping Announcement, with transaction ID No. TR-08d4d484-b0c1 for 10.57 MT CSPK IP; from PT Eastern Sumatra Indonesia – Bukit Maradja POM (RSPO_PO1000000099) as Seller to PT SMART Tbk – Belawan KCP (RSPO_PO1000006555) as Buyer. Shipping date 08-11-2020; Contract 2020/LTC-PK/BM/08; Confirmation date 10-12-2020.</li> <li>- Shipping Announcement, with transaction ID No. TR-ce3458ad-ac61 for 539.43 MT CSPK IP; from PT Eastern Sumatra Indonesia – Bukit Maradja POM (RSPO_PO1000000099) as Seller to PT SMART Tbk – Belawan KCP (RSPO_PO1000006555) as Buyer. Shipping date 30-09-2020; Contract 2020/LTC-PK/BM/08; Confirmation date 08-10-2020.</li> </ul> <p>Detail Information available:</p> <ul style="list-style-type: none"> <li>• The name and address of the buyer: PT SMART Tbk, address Sinar Mas Land Plaza Menara 2 Lt.30, Jl. MH Thamrin No.51, Gondangdia, Menteng, Jakarta Pusat.</li> <li>• The name and address of the seller: PT Eastern Sumatra Indonesia, address Gedung Forum Nine Lt.10, Suite 1-11, Jl. Imam Bonjol No.9 Petisah Tengah, Medan Petisah, Kota Medan 20112</li> <li>• The loading or shipment / delivery date: 10 September 2020 and 7 November 2020 based on Dispatch Slip.</li> <li>• The date on which the documents were issued: Contract on 26 August 2020; DO on 1 September 2020; Dispatch Slip on 10 September 2020 and 7 November 2020.</li> <li>• A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations): CSPK RSPO IP notation on all mill records.</li> </ul>	
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		<ul style="list-style-type: none"> <li>• The quantity of the products delivered: from sampled dispatch slip: 26.11 MT and 26.89 MT of Palm Kernel.</li> <li>• Any related transport documentation: vehicle ID No. BK 8751 DQ by CV Sawita Sejahtera Logistic.</li> <li>• Supply chain certificate number of the seller: RSPO 632266.</li> <li>• A unique identification number: Contract No.2020/LTC-PK/BM/10 (verified on all record).</li> </ul>	
3.8.9	<p>Outsourcing Activities</p> <p>i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification.</p> <p>ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</p>	<p>Bukit Maradja POM is not outsourcing its milling activities to any independent third parties. The mill only outsourcing transport activity of CPO and PK to several contractor. The unit of certification ensures through contractual agreements that the contractors are complies to RSPO Supply Chain requirement.</p> <p>Based on sales contract, deliveries of CPO are using transport contractors that appointed, contracted and instructed by the unit of certification, whilst deliveries of PK, transport contractors are managed by buyer. During transport of CPO, legal ownership is under PT Eastern Sumatra Indonesia, whilst during transport of PK, legal ownership is belonging to buyer.</p> <p>Bukit Maradja POM has an agreement covering the transport process with each contractor; therefore, the CB has access to the transport contractor or operation if an audit is deemed necessary.</p> <p>Contract available:</p> <p>a. "Perjanjian Pengangkutan PT Eastern Sumatra Indonesia dengan Pengangkutan Sahabat No.2015/Angkutan/CPO/BM-Dumai/01" signed on 15 January 2015. CV Angkutan Sahabat issued a statement letter signed by Mr. Gunawan Ruslan, dated 14 October 2020. The statement is "CV Angkutan Sahabat is willing to follow requirement of RSPO Supply chain, and willing to be audited by certification body if its deemed necessary".</p>	Complied

		<p>b. "Perjanjian Pengangkutan PT Eastern Sumatra Indonesia dengan Pengangkutan Felindo No.2015/Angkutan/CPO/BM-Dumai/04" signed on 15 January 2015. Pengangkutan Felindo issued a statement letter signed by Drs. Sutrisno Sukijung, dated 8 August 2020. The statement is "CV Felindo Sukses Gemilang is willing to follow requirement of RSPO Supply chain, and willing to be audited by certification body if its deemed necessary".</p> <p>c. "Perjanjian Pengangkutan PT Eastern Sumatra Indonesia dengan PO Sumber Agung No.2015/Angkutan/CPO/BM-Dumai/02" signed on 15 January 2015. "Addendum Perjanjian Pengangkutan No.2015/Angkutan/CPO/BM-Dumai/02 dated 1 November 2015" shifting the transporter name from PO Sumber Agung to CV Sejahtera Abadi. CV Sejahtera Abadi issued a statement letter signed by Mr. Harsono Sukijung, dated 1 August 2020. The statement is "CV Sejahtera Abadi is willing to follow requirement of RSPO Supply chain, and willing to be audited by certification body if its deemed necessary".</p> <p>d. "Perjanjian Pengangkutan PT Eastern Sumatra Indonesia dengan CV Jasa Sahabat Abadi No.2015/Angkutan/CPO/BM-Dumai/06" signed on 21 October 2015. "Addendum Perjanjian Pengangkutan No.2015/Angkutan/CPO/BM-Dumai/06" dated 1 December 2016 shifting the expiry of agreement from 31 November 2016 to be perpetual as long as both parties need. CV Jasa Sahabat Abadi issued a statement letter signed by Mr. Christianto Sanjaya Ong, dated 8 August 2020. The statement is "CV Jasa Sahabat Abadi is willing to follow requirement of RSPO Supply chain, and willing to be audited by certification body if its deemed necessary".</p> <p>All contracts are perpetual, as long as the parties need.</p> <p>Bukit Maradja 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</p>	
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		<p>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 Bukit Maradja POM: "Buku Pemeriksaan Kendaraan CPO dan PK", sampled: CPO truck No. BK 8210 CK from CV Sejahtera Abadi; inspected to carry certified CPO from Bukit Maradja POM to PT SMART Tbk – Belawan, dated 16 December 2020.</p>																
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	<p>Bukit Maradja POM has recorded the names and contact details of all contractors used for transport of certified CPO, as follows:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr style="background-color: #e1f5fe;"> <th style="text-align: center;">Contractor</th> <th style="text-align: center;">Contact Person</th> <th style="text-align: center;">Address</th> </tr> </thead> <tbody> <tr> <td>CV Angkutan Sahabat</td> <td>Mr. Gunawan Ruslan</td> <td>Jl. Petumbukan Dusun III, Jaharun B – Ggalang, Deli Serdang – Sumatera Utara.</td> </tr> <tr> <td>CV Jasa Sahabat Abadi</td> <td>Mr. Christianto Sanjaya Ong</td> <td>Jl. Besar Kisaran – Medan km 5 Sidomulyo, Pulo Bandring</td> </tr> <tr> <td>CV. Sejahtera Abadi</td> <td>Mr. Harsono Sukijung</td> <td>Jl. Jati No.65 Pulo Brayan Bengkel Kec. Medan Timur, Medan 20239</td> </tr> <tr> <td>CV Felindo Sukses Gemilang</td> <td>Mr. Sutrisno Sukijung</td> <td>Jl. Gunung Krakatau Ujung No. 62, Medan</td> </tr> </tbody> </table>	Contractor	Contact Person	Address	CV Angkutan Sahabat	Mr. Gunawan Ruslan	Jl. Petumbukan Dusun III, Jaharun B – Ggalang, Deli Serdang – Sumatera Utara.	CV Jasa Sahabat Abadi	Mr. Christianto Sanjaya Ong	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	CV Felindo Sukses Gemilang	Mr. Sutrisno Sukijung	Jl. Gunung Krakatau Ujung No. 62, Medan	Complied
Contractor	Contact Person	Address																
CV Angkutan Sahabat	Mr. Gunawan Ruslan	Jl. Petumbukan Dusun III, Jaharun B – Ggalang, Deli Serdang – Sumatera Utara.																
CV Jasa Sahabat Abadi	Mr. Christianto Sanjaya Ong	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																
CV Felindo Sukses Gemilang	Mr. Sutrisno Sukijung	Jl. Gunung Krakatau Ujung No. 62, Medan																
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	The unit of certification inform the audit team in case there is changes in the list of FFB, CPO and PK transporter through the RSPO P&C Pre Audit Information checklist.	Complied															
3.8.12	<p>Record keeping</p> <p>i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.</p> <p>ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory</p>	Bukit Maradja Palm Oil Mill 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 Eastern Sumatra 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	Complied															

	<p>requirements and be able to confirm the certified status of raw materials or products held in stock.</p> <p>iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p>iv) For Mass Balance Module, the mill:</p> <p>a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</p> <p>b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock).</p>	<p>and PK dispatch from Palm Oil Mill and receiving in storage tank for delivery; Shipping instruction and preparation; CPO and PK stock balancing post-shipping.</p> <p>Bukit Maradja POM maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements. Daily Production Figure for 31 December 2020: FFB received month todate is 7,399.41 MT; year todate is 121,660.31 MT. CPO produced month todate is 1,717.65 MT; year todate is 28,427.27 MT. PK produced month todate is 345,81 MT; year todate is 5,977.86 MT. OER month todate is 22.65%; year todate is 23.40%. KER month todate is 4.56%; year todate is 4.91%. CPO dispatched month todate is 1,454.07 MT; year todate is 28,333.45 MT. PK dispatched month todate is 300.04 MT; year todate is 5,976.13 MT.</p> <p>The SOP 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 stipulates storage and control of recording related to product sales, transportation until product delivery is stored with minimum period of 5 years.</p> <p>Bukit Maradja POM is able to record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis. For period January to December 2020, FFB processed is 121,660.31 MT; CPO produced is 28,427.27 MT; PK produced is 5,977.86 MT; OER is 23.40%; KER is 4.91%; CPO dispatched is 28,333.45 MT; PK dispatched is 5,976.13 MT; processing hour is 4,465.69 hours; mill throughput is 27.24 ton/hour.</p> <p>Sample of goods out records:</p> <p><b>CSPO</b></p> <ul style="list-style-type: none"> <li>- Contract No.2020/LTC-CPO/ESI/44 dated 23 October 2020; between Seller: PT Eastern Sumatra Indonesia (address Gedung Forum Nine Lt.10, Suite 1-11, Jl. Imam Bonjol No.9 Petisah Tengah, Medan</li> </ul>	
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		<p>Petisah, Kota Medan Sumatera Utara - 20112) and Buyer: PT SMART Tbk (address Sinar Mas Land Plaza Menara 2 Lt.28-30, Jl. MH Thamrin No.51, Gondangdia, Menteng, Jakarta Pusat); for sales of 500 MT Crude Sustainable Palm Kernel – RSPO IP; Certificate No. RSPO 632266.</p> <ul style="list-style-type: none"> <li>- Delivery Order No.2020/ESI-CPO/LTC/DO/112 dated 15 December 2020, ordering shipment of 250 MT CPO – RSPO IP, from PT Eastern Sumatra Indonesia – Loko PKS Bukit Maradja to buyer PT SMART Tbk at Jl. Belmera Baru III, Belawan II, Belawan.</li> <li>- Delivery Order No.2020/ESI-CPO/LTC/DO/113 dated 21 December 2020, ordering shipment of 250 MT CPO – RSPO IP, from PT Eastern Sumatra Indonesia – Loko PKS Bukit Maradja to buyer PT SMART Tbk at Jl. Belmera Baru III, Belawan II, Belawan.</li> <li>- There are 23 Dispatch Slip which refer to DO No.2020/ESI-CPO/LTC/DO/112, consist of: CPO20001031W, CPO20001032W, CPO20001033W, CPO20001034W, CPO20001035W, CPO20001036W, CPO20001037W, CPO20001038W, CPO20001039W, CPO20001040W, CPO20001048W.</li> <li>- Dispatch Slip No.CPO20001036W, dated 16/12/2020; from PT Eastern Sumatra Indonesia – Bukit Maradja POM; to PT SMART Tbk; product Crude Palm Oil; quantity 25.99 MT; DO No.2020/ESI-CPO/LTC/DO/112; Contract No. 2020/LTC-CPO/ESI/44; Certificate RSPO 632266; Module Sustainable Product IP; Vehicle ID No. BK 8210 CK; Transporter CV Sejahtera Abadi.</li> <li>- Shipping Announcement, with transaction ID No. TR-2ff7a535-6ba4 for 15.08 MT CSPO IP; from Bukit Maradja POM PT Eastern Sumatra Indonesia (RSPO_PO100000095) as Seller to PT SMART Tbk – Belawan Refinery (RSPO_PO1000000970) as Buyer. Shipping date 08-12-2020; Contract 2020/LTC-CPO/ESI/44; Confirmation date 09-03-2021.</li> </ul>	
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		<ul style="list-style-type: none"> <li>- Shipping Announcement, with transaction ID No. TR-29b323d0-7b71 for 484.07 MT CSPO IP; from Bukit Maradja POM PT Eastern Sumatra Indonesia (RSPO_PO1000000095) as Seller to PT SMART Tbk – Belawan Refinery (RSPO_PO1000000970) as Buyer. Shipping date 31-12-2020; Contract 2020/LTC-CPO/ESI/44; Confirmation date 27-01-2021.</li> </ul> <p><b>PK.</b></p> <ul style="list-style-type: none"> <li>- Contract No.2020/LTC-PK/BM/10 dated 26 August 2020; between Seller: PT Eastern Sumatra Indonesia (address Gedung Forum Nine Lt.10, Suite 1-11, Jl. Imam Bonjol No.9 Petisah Tengah, Medan Petisah, Kota Medan Sumatera Utara - 20112) and Buyer: PT SMART Tbk (address Sinar Mas Land Plaza Menara 2 Lt.30, Jl. MH Thamrin No.51, Gondangdia, Menteng, Jakarta Pusat); for sales of 550 MT Crude Sustainable Palm Kernel – RSPO IP; Certificate No. RSPO 632266.</li> <li>- Delivery Order No.2020/LTC-PK/BM/DO/11 dated 1 September 2020, ordering shipment of 600 MT PK – RSPO IP, from PT Eastern Sumatra Indonesia – Loko PKS Bukit Maradja to buyer PT SMART Tbk.</li> <li>- “Instruksi Pengambilan Barang” No.149/SMART-IPB/L/11/20 dated 5 Nov 2020 issued by PT SMART Tbk to CV Sawita Sejahtera Logistic, regarding shipping instruction of Palm Kernel based on DO No.2020/LTC-PK/BM/DO/11.</li> <li>- There are 25 Dispatch Slip which refer to DO No.2020/LTC-PK/BM/DO/11, consist of PK20000212W, PK20000213W, PK20000214W, PK20000215W, PK20000216W, PK20000217W, PK20000218W, PK20000219W, PK20000220W, PK20000221W, PK20000222W, PK20000223W, PK20000224W, PK20000225W, PK20000226W, PK20000227W, PK20000228W, PK20000229W, PK20000230W, PK20000231W, PK20000232W, PK20000233W, PK20000234W, PK20000235W, PK20000236W.</li> </ul>	
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		<ul style="list-style-type: none"> <li>- Dispatch Slip No.PK20000212W, dated 07/11/2020; from PT Eastern Sumatra Indonesia – Bukit Maradja POM to PT SMART Tbk; product Palm Kernel; quantity 26.11 MT; No.2020/LTC-PK/BM/DO/11; Contract No. No.2020/LTC-PK/BM/10; Certificate RSPO 632266; Module Sustainable Product IP; Vehicle ID No. BK 8751 DQ; CV Sawita Sejahtera Logistic.</li> <li>- Shipping Announcement, with transaction ID No. TR-8e31ec18-f63a for 426.84 MT CSPK IP; from PT Eastern Sumatra Indonesia – Bukit Maradja POM (RSPO_PO1000000099) as Seller to PT SMART Tbk (RSPO_PO1000006555) as Buyer. Shipping date 30-11-2020; Contract 2020/LTC-PK/BM/10; Confirmation date 07-12-2020.</li> <li>- Shipping Announcement, with transaction ID No. TR-4f46cffd-8de7 for 173.16 MT CSPK IP; from PT Eastern Sumatra Indonesia – Bukit Maradja POM (RSPO_PO1000000099) as Seller to PT SMART Tbk (RSPO_PO1000006555) as Buyer. Shipping date 31-12-2020; Contract 2020/LTC-PK/BM/10; Confirmation date 11-01-2021.</li> </ul>	
3.8.13	<p><b>Extraction Rate</b></p> <p>The oil extraction rate (OER) and the kernel extraction rate(KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	<p>Extraction rate is applied to provide reliable estimation of CPO and PK produced. For year 2021, the estimated extraction rate from FFB into CPO is 23.50%, whilst from FFB to PK is 5.00%. Based on Daily Production Figure dated 31 December 2020, actual extraction rate ratios from FFB into CPO is 23.40% (average 12 months), whilst from FFB to PK is 4.91% (average 12 months).</p>	Complied
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	<p>The actual Oil Extraction Rates (OER) and Kernel Extraction Rates (KER) are monitored on daily basis through sounding result and documented in Daily Production Figure. Based on Daily Production Figure dated 31 December 2020 for period January to December 2020, actual OER is 23.70% and KER is 4.91%. Based on Daily Production Figure dated 15 March 2021 for period January to 15 March 2021, actual OER is 23.17% and KER is 4.90%.</p>	Complied

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<p>3.8.15</p>	<p>Processing</p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	<p>Bukit Maradja POM does 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 certified product.</p> <p>Bukit Maradja POM have 2 storage tanks, consist of BMST01 (capacity 500 MT) and BMST02 (capacity 1,000 MT). Storage tanks are dedicated only for CPO from Bukit Maradja POM. There are no contamination with non-certified product.</p>	<p>Complied</p>
<p>3.8.16</p>	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p>	<p>PT Eastern Sumatra Indonesia – Bukit Maradja 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_PO1000000095.</p> <p>As a Palm Oil Mill which takes legal ownership and physically handled RSPO certified sustainable oil palm product, Bukit Maradja POM has made Shipping Announcement for certified CPO and PK sold.</p> <p>For example:</p> <p>a. Shipping Announcement, with transaction ID No. TR-2ff7a535-6ba4 for 15.08 MT CSPO IP; from Bukit Maradja POM PT Eastern Sumatra Indonesia (RSPO_PO1000000095) as Seller to PT SMART Tbk – Belawan Refinery (RSPO_PO1000000970) as Buyer. Shipping date 08-12-2020; Contract 2020/LTC-CPO/ESI/44; Confirmation date 09-03-2021.</p> <p>b. Shipping Announcement, with transaction ID No. TR-29b323d0-7b71 for 484.07 MT CSPO IP; from Bukit Maradja POM PT Eastern Sumatra Indonesia (RSPO_PO1000000095) as Seller to PT SMART Tbk – Belawan Refinery (RSPO_PO1000000970) as Buyer. Shipping</p>	<p>Complied</p>

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		<p>date 31-12-2020; Contract 2020/LTC-CPO/ESI/44; Confirmation date 27-01-2021.</p> <p>c. Shipping Announcement, with transaction ID No. TR-8e31ec18-f63a for 426.84 MT CSPK IP; from PT Eastern Sumatra Indonesia – Bukit Maradja POM (RSPO_PO1000000099) as Seller to PT SMART Tbk – Belawan KCP (RSPO_PO1000006555) as Buyer. Shipping date 30-11-2020; Contract 2020/LTC-PK/BM/10; Confirmation date 07-12-2020.</p> <p>d. Shipping Announcement, with transaction ID No. TR-4f46cffd-8de7 for 173.16 MT CSPK IP; from PT Eastern Sumatra Indonesia – Bukit Maradja POM (RSPO_PO1000000099) as Seller to PT SMART Tbk – Belawan KCP (RSPO_PO1000006555) as Buyer. Shipping date 31-12-2020; Contract 2020/LTC-PK/BM/10; Confirmation date 11-01-2021.</p> <p>During this assessment period, Bukit Maradja POM sold several volumes of certified CPO as another certification scheme. Therefore, Bukit Maradja POM performed "Remove" in the RSPO IT Platform as well as for CSPO withdrawn from transport deduction, for examples:</p> <p>e. Transaction ID: ST-TR-8b3da17e-8f0c; dated 09-03-2021; Product CSPO; Stock Transaction Type: Remove from certified stock; Transaction volume: 1,022.61 MT.</p> <p>f. Transaction ID: ST-TR-27f667cb-9cc4; dated 09-03-2021; Product CSPO; Stock Transaction Type: Remove from certified stock; Transaction volume: 733.47 MT.</p> <p>g. Transaction ID: ST-TR-9bdf3f59-0b95; dated 16-02-2021; Product CSPO; Stock Transaction Type: Remove from certified stock; Transaction volume: 0.12 MT.</p>	
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		Transaction ID: ST-TR-cefeaf29-2b96; dated 16-02-2021; Product CSPO; Stock Transaction Type: Remove from certified stock; Transaction volume: 765.26 MT.	
3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	<p>The procedure for claims is stated in SOP Supply Chain and Traceability of Palm Products (MKT-03-06/04-03-2019/Rev.0) dated 18 March 2019. The mill only makes claims on RSPO Certified product in compliance with RSPO Rules on Market Communications and Claims. Statement of RSPO certified and Identity Preserved are only stated in sales documents of RSPO certified product.</p>	Complied
<b>General corporate communications</b>			
4.1	<p>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.</p>	<p>PT Eastern Sumatra Indonesia is a subsidiary of RSPO registered member, SIPEF Group. SIPEF Group, 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></p>	Complied
4.2	<p>In corporate communications a member is allowed to:</p> <ul style="list-style-type: none"> <li>• Display its RSPO membership status</li> <li>• Display the RSPO web address (www.rspo.org)</li> <li>• State that the member supports the work of the RSPO</li> <li>• State the member’s history with regard to the RSPO.</li> <li>• Use the RSPO trademark to promote its membership of the RSPO.</li> </ul> <p>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.</p>	<p>Corporate communication in SIPEF Group website:</p> <ul style="list-style-type: none"> <li>• Display its RSPO membership status: No, SIPEF did not display its RSPO membership status.</li> <li>• Display the RSPO web address: Not in direct manner. SIPEF made a link to RSPO website.</li> <li>• 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".</li> <li>• State the member’s history with regards to the RSPO: No. SIPEF did not state their history with regards to the RSPO.</li> <li>• 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.</li> </ul>	Complied



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4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	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.	Complied
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member’s own products.	No, SIPEF did not display its RSPO membership status. It is clear that the statement are clear and did not mislead consumers or other stakeholders as to the certified content of oil palm products in the SIPEF’s own products.	Complied
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	No, SIPEF Group did not display the RSPO Corporate Logo in the website as well as in the correspondence letter.	Complied
<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 Eastern Sumatra Indonesia – Perlabian POM stated in sales documents, e.g. Sales Contract, Delivery Order and Despatch Slip that the product they sold is RSPO Certified CPO or PK model IP.	Complied
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	PT Eastern Sumatra Indonesia – Perlabian POM stated in sales documents, e.g. Sales Contract, Delivery Order and Despatch Slip that the product they sold is RSPO Certified CPO or PK model IP.	Complied
5.3	Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options: a) If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer’s SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are	PT Eastern Sumatra 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.	Not Applicable

	<p>aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.</p> <p>b) If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p>		
5.4	<p>A certified member can provide information to its customers detailing the presence of certified palm oil contained within a product even if it is not eligible for a product-specific under RSPO rules. The end product must not be labelled as certified or sold in such a way that implies RSPO certification.</p> <p>For example, a retailer or food service company may require a breakdown of all palm based ingredients within an end product and the certified status of each. This information may be provided by a certified RSPO member without constituting a product-specific claim.</p>	<p>PT Eastern Sumatra 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>	Not Applicable
<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>There is no business to consumer communication as this is an upstream activity certification.</p>	Not Applicable
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>There is no business to consumer communication as this is an upstream activity certification.</p>	Not Applicable
6.3	<p>When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.</p>	<p>There is no business to consumer communication as this is an upstream activity certification.</p>	Not Applicable
6.4	<p>Business to consumer communication shall not include information about the claimant's RSPO membership status.</p>	<p>There is no business to consumer communication as this is an upstream activity certification.</p>	Not Applicable

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6.5	Members shall not communicate to consumers' information about their suppliers' RSPO membership status.	There is no business to consumer communication as this is an upstream activity certification.	Not Applicable
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.	There is no business to consumer communication as this is an upstream activity certification.	Not Applicable
6.7	Use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorised product-specific claim.	There is no business to consumer communication as this is an upstream activity certification.	Not Applicable
6.8	RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules applying to RSPO supply chain certified members. The guidance document for audits is available on <a href="http://www.rspo.org">www.rspo.org</a> .	There is no business to consumer communication as this is an upstream activity certification.	Not Applicable

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

**Certified oil palm content (IP)**

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	For IP, 95% or above of the oil palm content must be RSPO IP-certified.	The Certified IP volume that can be sold is only the volume requested in the PalmTrace. Hence the CPO volume sold under IP model is considered 100% content.	Complied
	For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.	Bukit Maradja POM use IP for RSPO supply chain certification model.	Not Applicable
	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.	The Certified IP volume that can be sold is only the volume requested in the PalmTrace. Hence the CPO volume sold under IP model is considered 100% content.	Complied
<b>Labelling and trademark (IP)</b>			
	Members are allowed to use the RSPO label in one of the following ways: <ul style="list-style-type: none"> <li>• RSPO trademark which includes the tag 'CERTIFIED' or</li> <li>• RSPO trademark which includes the tag 'This product contains certified sustainable palm oil'. Wherever a RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. 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.</li> </ul>	There is no product partial claims	Not Applicable
<b>Messaging (IP)</b>			
	Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements: <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> </ul>	There is no product partial claims	Not Applicable

	<ul style="list-style-type: none"> <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><b>Principle 4: Respect community and human rights and deliver benefit</b></p>			
<p>Respect community rights, provide equal opportunities, maximise benefits from engagement and ensure remediation where needed.</p>			
<p><b>Criteria 4.1:</b> The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.</p>			
<p>4.1.1</p>	<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>PT. Eastern Sumatra Indonesia established Company Policy on Human Rights No.QMM-40-01-P02/27-03-2019 signed by President Director on 27 March 2019. The policy stated company recognises that human rights are universal and apply to all, without any form of distinction. Company supports the implementation of the International Bill of Human Rights, and of the ILO Declaration on Fundamental Principles and Rights at Work, as they are transcribed into the laws and regulation of Republic of Indonesia. 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.</p> <p><b>Bukit Maradja POM:</b></p>	<p>Complied</p>

		<p>Socialization of policy to respect human right, in Bukit Maradja POM carried out on 27 January 2020; attended by 8 workers from mill’s office; 26 workers from Processing Shift A; 25 workers from workshop; 9 workers from gardeners, water treatment plant, dayworkers. Socialization of this policy in Bukit Maradja POM carried out on 17 January 2020; attended by 26 workers from Processing Shift B.</p> <p><b>Bukit Maradja Estate:</b></p> <p>This policy communicated to contractors. For example, sighted the record of policy to respect human right socialization on 23 February 2021. The socialization attended by 10 drivers and helper from PT. Multi Prima Nusa (FFB transporter).</p> <p><b>Kerasaan Estate</b></p> <p>Socialization of respect to human rights policy in Kerasaan Estate carried out:</p> <ul style="list-style-type: none"> <li>- 71 workers from Division I Kerasaan Estate dated 6 February 2021;</li> <li>- 69 workers and 15 PKWT/contract workers from Division III Kerasaan Estate, dated 4 January 2021.</li> </ul> <p><b>Timbang Deli Estate:</b></p> <p>PT. Timbang Deli Indonesia established Company Policy of Human Rights No.TDI-QM/11 signed by President Director on 1 September 2017. The policy stated company recognises that human rights are universal and apply to all, without any form of distinction. Company supports the implementation of the International Bill of Human Rights, and of the ILO Declaration on Fundamental Principles and Rights at Work, as they are transcribed into the laws and regulation of Republic of Indonesia. 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.</p>	
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		The human rights policy disseminated on 1 February 2021: to 10 sprayers, 1 sprayer mandor, 17 harvesters, 2 harvester mandors, 3 pest and disease operators.	
4.1.2	The unit of certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations.	<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 was a record of land claims between the company and Kelompok Tani Pageraja.</p> <p>However, certificate holder did not use violence approach to handle all case related to their operational activity. There is no evidences of mercenaries and paramilitaries usage in their operations.</p>	Complied
<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	<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>Based on public consultations with local communities during the audit, such as Pengulu Nagori and community leaders from Nagori Pematang Syahkuda, Nagori Pematang Asilom, Kelurahan Kerasaan I, Nagori Pardomoan Nauli and related agencies such as the Plantation Office and Land Office of Simalungun Regency, information was obtained that the company has carried out operational development of gardens. oil palm since the Dutch colonial rule. There is no process of land acquisition from community land by the company because the entire company concession area has existed since the Dutch era.</p> <p>Based on document verification, statements from related agencies and field visits indicate that PT Eastern Sumatra Indonesia and PT Kerasaan Indonesia have not cleared new land, however, they have several procedures for resolving disputes, namely:</p> <p>a. The mechanism used to implement land compensation prior to opening new land is set forth in document No. LCA-01-01 / 23-09-2020 / Rev 2 (Land and Planting Compensation inside Location Permit of The Company) signed by Management on September 28, 2020.</p>	Complied

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		<p>b. The mechanism used to resolve conflicts due to illegal cultivation within the HGU area is set out in Document No. LCA-01-03 / 01-02-2020 / Rev 0 (Illegal Planting and Building Owned by Third Party Inside HGU of The Company) signed by Management on 18 February 2020.</p> <p>c. The company has developed a complaint mechanism as stipulated in SOP No. IAD-01-08 / 22-01-2020 / Rev.0 (Grievance Procedure) signed by the President Director on January 30, 2020.</p> <p>d. The company already has a company policy related to Wistleblower (Document No. QMM-40-01-P16 / 14-01-2019 / Rev. 1) signed by Management on January 14, 2019, states that;</p> <ul style="list-style-type: none"> <li>- PT Tolan Tiga Indonesia guarantees the confidentiality of the report and the information it contains as well as the anonymity of the whistleblower or sender, even if the report is subsequently proven to be incorrect or unfounded.</li> <li>- Any kind of threat, retaliation, penalty or discrimination against the whistleblower or the reported party-or anyone who has participated in the investigation into the validity of the report-will not be tolerated. PT Tolan Tiga Indonesia reserves the right to take the appropriate actions against anyone who retaliates or threatens to retaliate against whistleblowers who have submitted a report according to this policy.</li> <li>- It is understood that the company may take appropriate disciplinary and / or legal measures to protect its right, assets and reputation against anyone who. In bad faith, has made false, unfounded or opportunistic report and / or has made reports for the sole purpose of defaming, slandering or causing damage to the reported party or to other parties mentioned in the report.</li> </ul> <p>PT Timbang Deli Indonesia:</p>	
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		<p>Based on public consultations with local communities during the audit such as Desa Timbang Deli and Keramat Gajah as well as information from related agencies such as the Plantation Service and Land Office of Simalungun Regency, information was obtained that the company had been carrying out operations to develop oil palm plantations since the Dutch colonial era. There is no process of land acquisition from community land by the company because the entire company concession area has existed since the Dutch era.</p> <p>Based on document verification, statements from related agencies and field visits indicate that PT Timbang Deli Indonesia has not cleared new land, however, they already have several procedures for resolving disputes, namely:</p> <ul style="list-style-type: none"> <li>a. The mechanism used for the implementation of land compensation before new land clearing is outlined in the SOP document No SOP / TDI / 02, Rev 1, (Land compensation Procedure) signed by Management on February 1, 2019.</li> <li>b. The company has developed a complaint mechanism from external parties as stipulated in SOP No. SOP / TD07, Rev.1 (Grievance Procedure with External Parties) signed by Management on February 1, 2019.</li> <li>c. The company has a company policy related to Wistleblower (Document No. SOP / TDI / 17, Rev. 0) which was signed by Management on January 1, 2019.</li> </ul> <p>According to interview with sample of workers onsite and labor union representative, complaints/grievances from the workers for last 12 months behind is none.</p>	
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.	As described in indicator 4.2.1, which states that the company has carried out operations in developing oil palm plantations since the Dutch colonial era. There is no process of land acquisition from community	Complied

		<p>land by the company because the entire company concession area has existed since the Dutch era.</p> <p>However, the company has policies and mechanisms to resolve disputes / claims from external parties. The land compensation mechanism document and the mechanism for submitting complaints from external parties are written in Indonesian, which is the language understood by most of the community around the company. Especially for company policy documents, it is printed in two languages, namely Indonesian and English.</p> <p>To anticipate if there are people who do not understand Indonesian or those who cannot read and write, the company has carried out direct outreach to the surrounding community regarding the complaint mechanism as well as the land compensation mechanism, for example:</p> <ol style="list-style-type: none"> <li>a. Socialization on February 8, 2021 in Timbang Deli Village which was attended by 25 participants consisting of village officials and the Timbang Deli community.</li> <li>b. Socialization on January 21, 2021 in Timbang Deli Village which was attended by 13 participants consisting of the Timbang Deli Village community.</li> <li>c. Based on interviews with Pengulu Nagori Pematang Syahkuda, Nagori Pematang Asilom, Kelurahan Keruansa I, Nagori Pardomoan Nauli, Timbang Deli Village and Kramat Gajah Village stated that their community members had received socialization related to the complaint mechanism and the land compensation process if the company was to carry out development.</li> </ol> <p>According to interview with sample of workers onsite and labor union representative, complaints/grievances from the workers for last 12 months was none.</p>	
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<p>4.2.3</p>	<p>The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.</p>	<p><b>PT Eastern Sumatra Indonesia:</b></p> <p>Based on the document verification, "the complaint mechanism contained in SOP No. IAD-01-08 / 22-01-2020 / Rev.0" shows that the time frame for providing responses to complaints, for example:</p> <ul style="list-style-type: none"> <li>- Complaints can be submitted via email, WhatsApp and Message to the Complaint Box.</li> <li>- Complaints submitted by stakeholders will be responded to by management a maximum of 3 days after the complaint is received by Unit management. For complaints that cannot be handled locally, this is notified by the Internal Audit Department using the contact details or available email of the Applicant (Acknowledge Receipt).</li> <li>- Responses to complaints will be sent within 30 days and will be notified if more than 30 days.</li> </ul> <p>Based on the results of public consultations with the Head of Nagori Pematang Syahkuda and Nagori Pematang Asilom, it was stated that there had been land disputes between people who named their group "Pegaraja" during 2018 - 2020 and PT Eastern Sumatra Indonesia. The auditor has carried out in-depth verification in this regard to documents and related parties, so that it can be described as follows:</p> <p>a. Indeed, there was a land dispute case in 1995 between the community (Hendrik Sihombing Group) and the company and it was resolved through the Simalungun District Court as a last resort. In 1996 an appeal was filed and in 1998 an appeal was made and it was decided in 2000 through the Supreme Court Letter No. 413 / H / 2000 / 830.K / PDT / 1998 dated 31 July 2000 as a copy of the Decision of the Supreme Court of the Republic of Indonesia at cassation level on 24 February 2000 Reg.No.830.K / PDT1998 in the case of Hendrik Sihombing et al with PT. SIPEF Indonesia (Eastern Sumatra Indonesia).</p>	<p>Complied</p>
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		<p>b. Several residents through Pagaraja made claims against the same object in the 2015 period but were rejected by the Simalungun District Court on the grounds that the object of the lawsuit was the same object as the case of Hendrik Sihombing's group.</p> <p>c. In 2018, several residents who are members of Pagaraja reported to the Police their chairperson for a case of fraud / embezzlement of funds and they were declared as suspects by the Police and detained for 21 (03-24 February 2019), after being submitted for a suspension of detention and getting guarantees from the family, the chairman of Pagaraja was released from Police custody on 24 February 2019.</p> <p>d. After going through the mediation process and court proceedings starting from the district court level, appeal and cassation during the period 2019 - 2020, on February 19, the decision of the Supreme Court (MA) Number: 341 K / Pid / 2020 was executed on April 20 2020, stated that the defendant Mr. Elperiansyah Nasution (Chairman of Pagaraja) was legally and convincingly proven guilty of a criminal act of fraud. This is as regulated and punishable under Article 378 of the Criminal Code (KUHP). Therefore, Bro. Elperiansyah was sentenced to prison for 1.6 years.</p> <p>Thus it can be concluded that there have been land claims by some residents (Hendrik Sihombing Cs Group) to PT Eastern Sumatra Indonesia but the case was declared finished in 2000 through Supreme Court Letter No.413 / H / 2000 / 830.K / PDT / 1998 dated July 31, 2000. The cases that existed in 2019 - 2020 were not a land dispute between the community and PT Eastern Sumatra Indonesia but a case of reporting several Pagaraja members against their chairmen for cases of fraud / embezzlement of funds.</p> <p><b>PT Kerasaan Indonesia:</b></p> <p>Based on the results of consultations with related agencies (Environmental Service, Land Office of Simalungun Regency) as well as</p>	
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		<p>with local village community leaders and security personnel, it was stated that there were no problems / complaints arising between the surrounding community and the company.</p> <p>Based on the verification of complaint recording documents during the 2020 period, no complaints were received to management, including from the surrounding community.</p> <p>Based on the results of consultations with the Management of the Trade Union and the Gender Committee, it was stated that during the 2020 period there were no complaints from members that were submitted to the Management.</p> <p>Based on a public consultation with the Manpower Office of Simalungun Regency, it was stated that there was 1 industrial relations dispute involving an employee who was dismissed in connection with an immoral case, mediation has been carried out but there is no agreement between the two parties and is currently going to the Industrial Relations Court process. The auditors have conducted in-depth verification of the case, both document verification and interviews with management and trade unions. Management can show evidence of the industrial relations dispute settlement process properly and is currently still waiting for the industrial relations court process</p> <p><b>PT Timbang Deli Indonesia:</b></p> <p>Based on the results of consultations with related agencies (Environmental Service, Land Office of Deli Serdang Regency) as well as with local village community leaders and security personnel stated that during 2020 there were no problems / complaints arising between the surrounding community and the company but in 2021 there were related complaints with the prohibition of grazing livestock in the HGU area of PT Timbang Deli Indonesia which has been an additional source of livelihood for the surrounding community.</p>	
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		<p>Based on the verification of the complaint record document during the 2020 period, there were no complaints submitted to management including from the surrounding community, but in 2021 there was 1 complaint submitted by a group of breeders around the company related to the prohibition of grazing livestock in the PT Timbang Deli Indonesia concession area even though The company still allows the community to take grass in the PT Kerasaan HGU area which is very much needed by the goat and cattle breeders in the village area around the company. Regarding the complaint, a coordination meeting was held between PT Timbang Deli Indonesia and representatives of breeders around the company on March 4, 2021 which was attended by 13 participants.</p> <p>Based on the results of consultations with the Management of the Trade Union and the Gender Committee, it was stated that during the 2020 period, no complaints from members were submitted to the Management.</p> <p>According to interview with sample of workers onsite and labor union representative, complaints/grievances from the workers for last 12 months behind is none.</p>	
4.2.4	<p>The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.</p>	<p>As described in indicator 4.2.3 which states that there is 1 dispute case in PT Kerasaan Indonesia concerning "Industrial Relations Dispute". The company has shown evidence of the involvement of other parties as a mediator, in this case the Mediator from the Manpower Office of Simalungun Regency but did not get an agreement between the two parties. The auditors have carried out in-depth verification of the case, both document verification and interviews with management and the Workers' Union as well as with the Manpower Office Mediator. Based on the information from the Mediator, it is stated that there is currently 1 industrial relations dispute between one of the former employees and PT Kerasaan Indonesia where mediation has been carried out by the</p>	Complied

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		<p>Manpower Office but has not received an agreement so that both parties agree to proceed the case to the relations court. industrial. Management can show evidence of the industrial relations dispute settlement process properly and is currently still waiting for the industrial relations court process.</p> <p>Whereas at PT Timbang Deli Indonesia there was 1 complaint submitted by the surrounding community regarding the prohibition of grazing livestock in the PT Timbang Deli Indonesia concession area even though the Company still allowed the community to take grass in the PT Kerasaan HGU area which was very much needed by goat and cow breeders in the village area. around the company. Regarding the complaint, a coordination meeting was held between PT Timbang Deli Indonesia and representatives of breeders around the company on March 4, 2021 which was attended by 13 participants.</p> <p>According to interview with sample of workers onsite and labor union representative, complaints/grievances from the workers for last 12 months behind is none.</p>	
<b>Criteria 4.3:</b> The unit of certification contributes to local sustainable development as agreed by local communities.			
4.3.1	Contributions to community development that are based on the results of consultation with local community are demonstrated.	<p><b>PT Eastern Sumatra Indonesia:</b></p> <p>The Certification Unit has conducted a social impact assessment, as outlined in the "Social Impact Analysis Document - March 2010". The social study was carried out in collaboration with the Indonesian Sustainable Palm Oil Foundation (YASBI). In the process of compiling the social impact study, multi-stakeholders involved through guided interviews, questionnaires and focus group discussions (FGD).</p> <p>Every 1 year period, the Certification Unit has evaluated the implementation of the Social Impact Assessment on the surrounding community as outlined in the document "Social Impact Assessment</p>	Complied

		<p>Implementation Report", where the results of the evaluation are used in the preparation of social programs for the following year.</p> <p>PT Eastern Sumatra Indonesia annually has prepared a Corporate Social Responsibility (CSR) Activity Plan, for example:</p> <ul style="list-style-type: none"> <li>a. The 2020 CSR plan consists of 9 types of activities, namely: Education, Health, Infrastructure, Furniture Equipment, Agriculture &amp; Micro Business, Sports, Arts, Religion and Socio-Economics. The total CSR plan for 2020 is Rp. 61,960,000, -</li> <li>b. The 2021 CSR plan also consists of 9 types of activities, namely: Education, Health, Infrastructure, Furniture Equipment, Agriculture &amp; Micro Business, Sports, Arts, Religion and Socio-Economics. The total CSR plan for 2021 is Rp. 65,147,770, -</li> </ul> <p>Based on document verification, it shows that the realization of PT Eastern Sumatra Indonesia's CSR activities in 2020 is valued at Rp. 82,329,704, -, for example as follows:</p> <ul style="list-style-type: none"> <li>a. Grader heavy equipment borrowing assistance for road repairs from the end of the old market to the rice fields of N. Malela Island (Koperasi Sejahtera Mandiri) Nagori Syahkuda Bayu which was realized in June 2020.</li> <li>b. Assistance for borrowing heavy equipment for grader to repair the cross-direction road to the Mitra Farmers garden (Koperasi Sari Mutiara Indah) Nagori Maligas Bayu which was realized in June 2020.</li> <li>c. Assistance for borrowing heavy equipment for road repair from Huta Pasar Lama to Nagori Maligas Bayu, Nagori Maligas Bayu which was realized in September 2020.</li> <li>d. Building material assistance in the form of cement and zinc nails for the repair of the Al-Arham Mosque, Nagori Silulu in December 2020.</li> </ul>	
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		<p>e. JCB heavy equipment borrowing assistance for road maintenance (compaction) in Gang Saudara Huta III, Pematang AsyloM which was realized in January 2021.</p> <p>Based on interviews with the head of the surrounding nagori and the Environmental Service, it was stated that for 2020, where the COVID-19 pandemic is ongoing, several routine events held by the Nagori government and local governments will be eliminated. Much of the CSR budget of PT Eastern Sumatra Indonesia has also been diverted to prevent the spread of COVID-19 by providing assistance for spraying disinfectant liquid and handling the impact of the COVID-19 pandemic to the surrounding community in the form of providing food packages for families with malnourished children (stunting) in 8 surrounding villages companies every month, for example;</p> <ul style="list-style-type: none"> <li>a. Delivery of food aid for families with malnourished (stunting) children in Nagori Bukit Maradja on November 20, 2020, valued at Rp. 671,075,</li> <li>b. Delivery of food aid for families with malnourished (stunting) children in Nagori Lingga on 20 November 2020, valued at Rp. 761,475.</li> <li>c. Delivery of food aid for families with malnourished (stunting) children in Nagori Pematang Syahkuda on 20 November 2020, valued at Rp. 1,147,375.</li> <li>d. Submission of 1,000 masks to the COVID-19 task force post in April 2020 valued at Rp. 5,500,000.</li> <li>e. Spraying of disinfectant liquid in 8 nagori around April 2020 worth Rp. 4,806,147.</li> </ul> <p>Based on interviews with the Head of Nagori Pematang AsyloM and Pematang Syahkuda stated that;</p> <ul style="list-style-type: none"> <li>a. The company's social assistance that was felt the most by residents during the COVID-19 pandemic was food aid in the form of packages;</li> </ul>	
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		<p>rice, milk, sugar, edible oil and sardines for families identified as having stunted children.</p> <ul style="list-style-type: none"> <li>b. Heavy equipment lending assistance to repair public facilities is also very helpful for the nagori government.</li> <li>c. The company always responds to requests for assistance from borrowing heavy equipment to repair public infrastructure in the surrounding nagori.</li> </ul> <p>Based on interviews with local nagori heads and document verification, it shows that at this time PT Eastern Sumatra Indonesia has started to facilitate the development of community gardens. The steps that have been taken include:</p> <ul style="list-style-type: none"> <li>a. The formation of a special department, namely "Smallholders Support" which is tasked with preparing everything related to the facilitation of community gardens, starting from socialization to the community, identifying land and prospective farmers who want to partner, forming oil palm farmer cooperatives, drafting an MoU, coordinating with the government local nagori etc.</li> <li>b. There have been 4 oil palm farmer cooperatives covering 9 nagori around the PT Eastern Sumatra Indonesia area.</li> <li>c. Identify and measure the land owned by potential partnership garden participants</li> </ul> <p>Based on interviews with the head of the surrounding nagori and the head of the Mancuk Mandiri Jaya cooperative, it was stated that the initiation of the formation of a palm oil farmer cooperative was encouraged by the company, data collection on member plantations, group development, assistance in making cooperative legality (deed of cooperative establishment), assistance to repair roads to the location of the partnership Estate. etc. Until now, it is still in the process of drafting a cooperation agreement between the Cooperative and PT Eastern Sumatra Indonesia.</p>	
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		<p><b>PT Kerasaan Indonesia:</b></p> <p>The Certification Unit has conducted a social impact assessment, as outlined in the "Social Impact Analysis Document - March 2010". The social study was carried out in collaboration with the Indonesian Sustainable Palm Oil Foundation (YASBI). In the process of compiling the social impact study, multi-stakeholders involved through guided interviews, questionnaires and focus group discussions (FGD).</p> <p>Every 1 year period, the Certification Unit has evaluated the implementation of the Social Impact Assessment on the surrounding community as outlined in the document "Social Impact Assessment Implementation Report", where the results of the evaluation are used in the preparation of social programs for the following year.</p> <p>As a form of social concern for the surrounding community, PT KI has compiled a CSR program every year, for example:</p> <ul style="list-style-type: none"> <li>a. Kerasaan Estate in 2020 and 2021 has compiled 9 types of Community Development programs in the form of activities in the fields of Education, Health, Infrastructure, Agriculture, Micro and Small Business, Sports, Arts, Religion and Socio-Economics.</li> <li>b. Records of realization of the implementation of the SCR program in 2020 are well documented by the company and outlined in the RKL-RPL Implementation Report every semester.</li> </ul> <p>Based on document verification, it shows that the realization of PT Kerasaan Indonesia's CSR activities in 2020 is valued at Rp. 30,740,795 for example:</p> <ul style="list-style-type: none"> <li>a. JCB heavy equipment loan assistance for excavation and stockpiling of the road to the waqf road in Nagori Bahbayu which was realized on 4 March 2020.</li> </ul>	
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		<ul style="list-style-type: none"> <li>b. Assistance with Uswatun Hasanah Raudhatul Athfal Huta II Wonorejo Kindergarten playground which was realized on 30 December 2020.</li> <li>c. JCB heavy equipment borrowing assistance for digging a 500 m ditch in Nagori Purwosari which was realized on 28 February 2020.</li> <li>d. JCB heavy equipment borrowing assistance for washing irrigation ditches (lifting sediment in trenches) Nagori Bandar Manis along 700 M which was realized on 23 May 2020.</li> <li>e. Assistance for the procurement of 1 set of uniforms and 2 volleyball pieces to the Wonorejo Nagori Government which was realized on 15 December 2020.</li> </ul> <p>Based on interviews with the head of the surrounding nagori and the Environmental Service, it was stated that for 2020, where the COVID-19 pandemic is ongoing, several routine events held by the Nagori government and local governments will be eliminated. Much of the CSR budget of PT Kerasaan Indonesia has also been diverted to prevent the spread of COVID-19 through providing assistance for spraying disinfectant liquid and handling the impact of the COVID-19 Pandemic to the surrounding community in the form of providing food packages for underprivileged families in several villages around the company, for example;</p> <ul style="list-style-type: none"> <li>a. Submission of food aid for underprivileged families in Nagori Purbaganda on 23 April 2020, valued at Rp. 1,710,000.</li> <li>b. Delivery of food aid for underprivileged families in Nagori PWonorejo on 23 April 2020, valued at Rp. 1,830,000.</li> <li>c. Delivery of food aid for underprivileged families in Nagori Sukosari on 23 April 2020, valued at Rp. 880,000.</li> <li>d. Delivery of food aid for underprivileged families in Nagori Pardomoan Nauli on 23 April 2020, valued at Rp. 2,250,000.</li> </ul>	
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		<p>e. Submission of food aid for underprivileged families in Kerasaan I Village on 23 April 2020, valued at Rp. 3,330,000.</p> <p>Based on interviews with the Head of Kerasaan I and Penghulu Nagori Pardomoan Nauli and Suara Inti NGO, stated that;</p> <ul style="list-style-type: none"> <li>a. The company's social assistance that was felt the most by residents during the COVID-19 pandemic was food aid in the form of packages; cooking oil, eggs and bath soap for underprivileged families.</li> <li>b. The company allows the community to collect grass in the PT Kerasaan HGU area which is very much needed by the goat and cattle breeders in the nagori-nagori areas around the company.</li> <li>c. Heavy equipment lending assistance to repair public facilities is also very helpful to the government Nagori.</li> <li>d. The company always responds to requests for assistance from borrowing heavy equipment to repair public infrastructure in the surrounding nagori.</li> </ul> <p>Based on interviews with local nagori heads and document verification, it shows that at this time PT Kerasaan Indonesia has started to facilitate the development of community Estates. The steps that have been taken include:</p> <ul style="list-style-type: none"> <li>a. The company has compiled an organizational structure that is specifically responsible for preparing smalholder programs starting from the level of "Smallholder Department, Senior Manager" for the HO then for the RMO level there is a Smallholder Manager Region, while for the regional level there is a Smallholder Field Head Assistant and for each unit there are Smalholder Field Asisstan (Smalholder Support). For PT Kerasaan Estate, there is 1 Field assistant with 3 staff.</li> <li>b. PT Kerasaan Indonesia has collected data on prospective Smallholder participants in the surrounding villages where at the end of 2020 the</li> </ul>	
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		<p>land for potential partnership Estates of 476.81 hectares had been recorded.</p> <ul style="list-style-type: none"> <li>c. Verification of the land belonging to Mr. Agus, a resident of Nagori Talun Rejo, Pematang Bandar District who owns a 13.12 Ha plot of land located in Huta V, Nagori Talun Rejo as stated in the Land Certificate issued by Pengulu Talun Rejo No. 594/95/2012 / SKT-TR / XII / PEM2020 dated 23 December 2020.</li> <li>d. Verification of land belonging to Mr Ngatino, a resident of Talun Madear Village, Pematang Bandar District who owns a 5,110 m2 plot of land in Talum Madear as in the Certificate of Ownership (SHM) issued by the Simalungun Regency Land Office no. 24 dated 9 November 1999 (NIB 02.09.09.12.00006, Letter of Measurement No. 6 / Talun Madear / 1999 dated 4 November 1999)</li> <li>e. The company has compiled the 2020-2021 SMD KRE Work Program which consists of 8 types of activities, namely:</li> <li>f. Partnership Land Preparation: Partner Farmer Networking, Collecting land ownership documents (Copy of KTP &amp; Copy of Land Certificate), Measurement of partner participant land by the GIS team.</li> <li>g. Establishment of Partner Cooperatives: Meeting the establishment of partner cooperatives, Preparation of documents required for the establishment of cooperatives, Management of cooperative establishment deeds at notaries, Management of cooperative permits.</li> <li>h. Signing of the MoU of Partnership between companies and partner cooperatives: Socialization &amp; signing of MoUs of partnerships with partner cooperatives, Signing of MoUs of partnerships to Village Heads, Camat and Regent / Head of Pekebunan, Submission of documents of partner cooperative members to the company</li> <li>i. Preparation for Collaborative Sales of FFB to third parties (Destination Factories): Survey of FFB board prices around the</li> </ul>	
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		<p>company, Survey of costs / operational costs of buying and selling FFB to third parties, Making estimates of partner cooperative crop delivery, Survey of locations and quality of FFB by third parties to locations company partner land, Determination and manufacture of factory cooperation contracts for the purpose of selling FFB.</p> <ul style="list-style-type: none"> <li>j. Preparation for receiving FFB yields from partner cooperative members: Opening partner cooperative bank accounts, opening accounts of partner cooperative members, socializing procedures for receiving and paying FFB yields to partner cooperatives, receiving FFB from partner cooperatives.</li> <li>k. Development of partner cooperatives and partner members: Coordination meetings with cooperative haian administrators (once a month), training on cooperative management and administration, technical training on oil palm cultivation (4 times a year), visits to partner farmers' lands (at least once every 2 months).</li> <li>l. Providing assistance to partner cooperatives: Tools and materials (PPE, Knapsack, etc.), road maintenance / repair assistance.</li> <li>m. Preparation for Partner Cooperative Certification</li> </ul> <p>Based on document verification, it shows that in 2020-2021 several meetings were held with potential cooperative partners, for example:</p> <ul style="list-style-type: none"> <li>a. Meeting with village officials and residents of Lingga village, Pematang Bandar District on February 18, 2020 to socialize the Smallholder Program and form partner cooperatives.</li> <li>b. Meeting with village officials and residents of Mariah Bandar, Pematang Bandar District on February 17, 2020 to socialize the Smallholder Program and form partner cooperatives</li> <li>c. A meeting with the Maju Sawit Sejahtera Marketing Cooperative, Kerasaan I Village, Pematang Bandar District on February 17, 2021</li> </ul>	
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		<p>which discussed the improvement of the cooperative member statement letter and the FFB sale and purchase payment system.</p> <p>d. Meeting with the Sumberejo Mandiri Jaya Multi-Purpose Cooperative, Talun Rejo Village, Pematang Bandar District on February 17, 2021 to discuss improvements to the cooperative member statement letter and the FFB sale and purchase payment system.</p> <p>Based on the results of interviews with the Village Head of Pardomoan Nauli and Kerasaan I and the Suara Inti NGO, it was stated that PT Kerasaan Indonesia has started to collaborate on the facilitation of partnership Estates with local communities who are members of the cooperative.</p> <p>Based on an interview with the Plantation Office of Simalungun Regency, it was stated that Kerasaan Indonesia had communicated intensively with the Plantation Office for the Community Estate Facilitation program.</p> <p><b>PT Timbang Deli Indonesia:</b></p> <p>PT Timbang Deli Indonesia has conducted 2 social impact studies, namely:</p> <p>a. In 2014 PT TDI has prepared a Social Impact Assessment (SIA) Report Document in collaboration with the Faculty of Forestry IPB in 2014 with the following summary;</p> <p>- The Social Impact Assessment (SIA) Document Drafting Team in 2014 were as follows;</p> <ol style="list-style-type: none"> <li>1. Handian Purwawangsa, S.Hut, M.Si; Team Leader, Expert on Issues and Culture.</li> <li>2. Udi Kusnidar, S.Hut; Expert in Socio-Economy and Culture.</li> <li>3. Ir. Heri Wiyono; Expert in Socio-Culture</li> </ol>	
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		<ul style="list-style-type: none"> <li>a. Building material assistance in the form of 55 sacks of cement for the repair of the An-Nadwah Mosque in Dusun II, Kramat Gajah Village on 14 April 2020.</li> <li>b. Building material assistance in the form of 19 sacks of cement to the Al Barokah Mukhlisin Foundation, Jaharun B Village, Galang District on 16 October 2020.</li> <li>c. Assistance for the construction of a trench which is the boundary between the PT Timbang Deli Indonesia HGU area and the rice fields of the Harapan Maju Farmer Group, Timbang Deli Village along 518.13 meters on 28 October 2020.</li> <li>d. Scholarships to three students of SDN 101961 and SDN 105389, Timbang Deli Village on 15 December 2020.</li> <li>e. Building material assistance in the form of 17 sacks of cement to Kramat Gajah Village, Galang District on 11 December 2020.</li> </ul> <p>Based on interviews with the Head of the Timbang Deli Village and the Village Head of Kramat Gajah stated that;</p> <ul style="list-style-type: none"> <li>a. Heavy equipment lending assistance to repair public facilities is also very helpful to the village government.</li> <li>b. The company always responds to requests for assistance from borrowing heavy equipment to repair public infrastructure in the surrounding village.</li> <li>c. There are complaints from the community regarding the prohibition of grazing livestock in the PT Timbang Deli Indonesia concession area even though the company still allows the community to take grass in the PT Kerasaan concession area which is very much needed by goat and cow breeders in the village area around the company. Regarding the complaint, a coordination meeting was held between PT Timbang Deli Indonesia and representatives of breeders around</li> </ul>	
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		the company on 4 March 2021 which was attended by 13 participants.	
<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.			
4.4.1	<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 (FPIC) process. Documents related to the history of land tenure and the actual legal or customary use of the land are available.	<p>The company has shown evidence of land control in the form of:</p> <p><b>PT Eastern Sumatra Indonesia:</b></p> <p>Based on the Verification of Legal Documents, it shows that initially the PT Eastern Sumatra Indonesia HGU land was obtained from the government which was a former West Rights (Hak erfpahct), in the form of an agreement document for transferring rights from the Indonesian government. Based on the company's development, PT Eastern Sumatra Indonesia (PT ESI) was originally named SA SIPEF NV which was founded in 1921, after a change in regulations in Indonesia related to western rights (Erfpahct rights), then in 1962 PT Eastern Sumatra Indonesia was founded but under the name originally PT Eastern Sumatra Rubber Estate (Indonesia) as the holder of land tenure which was previously under the name SA SIPEF NV. Only in 1986, PT Eastern Sumatra Rubber Estate (Indonesia) changed its name to PT Eastern Sumatra Indonesia.</p> <p>The company obtained Land Rights in the form of Business Use Rights (HGU) for the first time in 1975 according to the Decree of the Minister of Agrarian Affairs / Head of BPN No.SK.46 / HGU / DA / 75, dated 21 October 1975 where at that time it was still under the name of PT. Eastern Sumatra Rubber Estate (Indonesia) whose rights expired on December 31, 1998.</p> <p>In 1997, PT Eastern Sumatra Indonesia obtained a license to extend Business Use Rights (HGU) for 25 years as stipulated in Decree No. 108 / HGU / BPN / 97, dated 26 August 1997 concerning the Granting of Extension of Business Use Rights over Land located in Simalungun Regency, North Sumatra Province on behalf of PT Eastern Sumatra Indonesia. PT Eastern Sumatra Indonesia is a name change from PT</p>	Complied

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		<p>Eastern Sumatra Rubber Estate (Indonesia) which has been approved by the Minister of Justice No. C2-2217-HT.01.04.TH 97 dated 17 March 1997 in accordance with the Notary Act of Kartini Muljadi, SH No.58 of 1986. The area of the HGU covers a land area of 3,177.94 hectares located in Siantar District, Simalungun Regency, North Sumatra Province.</p> <p>As a follow-up to the extension of the HGU, the Land Office of Simalungun Regency in 1997 issued a HGU Certificate No.2 of 1997 located in Pematang Sahkuda Village on October 16, 1997 with an area of 3,177.94 Ha in accordance with Letter of Measurement No. 02.09.03.34.2.00348 / 1997 dated 16 October 1997. The expiration period for the extension of the HGU certificate is on 31 December 2023.</p> <p><b>PT Kerasaan Indonesia:</b></p> <p>Based on the Verification of Legal Documents, it shows that initially the PT Kerasaan Indonesia HGU land was an ex-concession land which in the context of the conversion of the UUPA (Law No. 5/1960) was still retained by the former owner (Sandiland Buttery &amp; Co) by being granted the right to cultivate for 6 (six) years from September 24, 1960 in accordance with the Letter of the Minister of Agriculture and Agrarian Affairs dated December 15, 1962 No. Ka 13/9. Based on Presidential Regulation No. 6 of 1964, this plantation was under government supervision and then based on an agreement between the Indonesian Government and The Laras (Sumatra) Rubber Estates Limited dated 11 May 1968, ownership and control of the plantation was returned to the company and granted a Business Use Rights (HGU) for 30 years commencing on 13 May 1968 on behalf of PT PP Laras Indonesia which ended its HGU license period on December 31, 1998 as stated in the Decree of the Minister of Home Affairs No. 45 / HGU / DA / 75 dated 21 October 1975 and later a Business Use Rights Certificate (HGU) was issued by the Head of the Sub Directorate of Agrarian Affairs Pematang Siantar No. 1 dated January 16, 1978 with an area of 2,468 Ha.</p>	
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		<p>In 1997 the company name changed from PT P.P. Laras Indonesia became PT Kerasaan Indonesia as per the Deed of Minutes of General Meeting of Shareholders drawn up before Notary Kartini Mulyadi SH on July 27, 1997 Number 102. The name change was registered at the Land Office of Simalungun Regency on October 1, 1997.</p> <p>In 1997, PT Kerasaan Indonesia received an extension of the HGU for a period of 25 years as stated in the Decree of the State Minister for Agrarian Affairs / Head of the National Land Agency No 90 / HGU / BPN / 97 dated 5 August 1997 which took effect from 1 January 1999 to 31 December 2023 with an area of 2,362.03 Ha.</p> <p><b>PT Timbang Deli Indonesia:</b></p> <p>PT Timbang Deli Indonesia as a business legal entity was established in 1962 based on the Decree of the Minister of Justice of the Republic of Indonesia No. J.A.5 / 14/10 dated 01 February 1962 ..</p> <p>Based on the Verification of Legal Documents, it shows that initially the PT Timbang Deli Indonesia HGU land was an ex-concession land in the context of the conversion of the UUPA (Law No. 5 of 1960) until then based on an agreement between the Indonesian Government and The Timbang Deli (Sumatra) Rubber Company Limited dated June 24, 1968, ownership and control of the plantation was returned to the company and granted a Business Use Right (HGU) for 30 years from 1968 on behalf of PT Timbang Deli Indonesia which the HGU license period ended on December 31, 1998.</p> <p>In 1997, PT Timbang Deli Indonesia received an extension of the HGU for a period of 25 years as stated in the Decree of the State Minister for Agrarian Affairs / Head of the National Land Agency No 69 / HGU / BPN / 97 dated 10 July 1997 which took effect from 1 January 1999 to 31 December 2023 with an area of 972.19 Ha.</p> <p>Based on social studies and environmental documents it shows that there is no indication of the existence of customary law communities or</p>	
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		<p>land controlled by indigenous peoples in the concession areas of PT Eastern Sumatra Indonesia, PT Kerasaan Indonesia and PT Timbang Deli Indonesia.</p> <p>Therefore, all the certified units operations (Mill and supply bases) does not diminish the legal, customary or user rights of other users.</p>	
<p>4.4.2</p>	<p>Copies 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 held in good faith with all affected groups within the community, with specific assurances that vulnerable, minority and gender groups are asked for their opinions, and that information has been provided to all affected groups, including in it information about the steps taken to involve them in decision making.</p>	<p>Based on document verification and information from related agencies, it also shows that PT Eastern Sumatra Indonesia, PT Kerasaan Indonesia and PT Timbang Deli Indonesia have not done any new land clearing, however, they already have several procedures to settle land compensation if they plan to open new plantations, namely :</p> <ul style="list-style-type: none"> <li>a. PT Eastern Sumatra Indonesia and PT Kerasaan Indonesia: The mechanism used to implement land compensation prior to the opening of new land as outlined in document No. LCA-01-01 / 23-09-2020 / Rev 2 (Land and Planting Compensation inside Location Permit of The Company) signed by Management on September 28, 2020.</li> <li>b. PT Timbang Deli Indonesia: The mechanism used for the implementation of land compensation before new land clearing as outlined in the SOP document No .: SOP / TDI / 02, Rev 1, (Land compensation procedure) signed by Management on February 1, 2019.</li> </ul> <p>Based on the verification of the two documents, it shows that therein describes the procedures for land acquisition starting from the land acquisition plan, data collection and land measurement by involving the village government and witnessed by adjacent parties, preparing land compensation documents (GRTT approval letter, owner data land, land tenure certificate, non-conflict certificate etc.), final review from RMO, approval from HO office, GRTT implementation.</p>	<p>Complied</p>

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	<p>4.4.2b Evidence that the unit of certification has respected communities to give or withhold their consent to the operations at the time that these decisions were taken;</p>	<p>As described in indicator 4.4.1, it shows that:</p> <ul style="list-style-type: none"> <li>- The company has a procedure that is used as a reference for carrying out land acquisition and resolving land complaints / claims.</li> <li>- Based on document verification, public consultations and field visits indicate that there was no new land clearing after November 2005 at PT Eastern Sumatra Indonesia, PT Kerasaan Indonesia and PT Timbang Deli Indonesia.</li> </ul> <p>Based on document verification, public consultations and field visits, it was shown that at the time of the audit there were no indications of land disputes between the company and other parties, including the surrounding community. However, in the period of 1995, there was a land dispute case between the community (Hendrik Sihombing Group) and the company and it was resolved through the Simalungun District Court as a last resort. In 1996 an appeal was filed and in 1998 an appeal was made and it was decided in 2000 through the Supreme Court Letter No. 413 / H / 2000 / 830.K / PDT / 1998 dated 31 July 2000 as a copy of the Decision of the Supreme Court of the Republic of Indonesia at cassation level on 24 February 2000 Reg.No.830.K / PDT1998 in the case of Hendrik Sihombing et al with PT. SIPEF Indonesia (Eastern Sumatra Indonesia). In 2015, several residents through the Pagaraja Group made a Return claim against the same object but were rejected by the Simalungun District Court on the grounds that the object of the lawsuit was the same object as the case of Hendrik Sihombing's group.</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>As described in indicator 4.4.1, it shows that:</p> <ul style="list-style-type: none"> <li>- The company has a procedure that is used as a reference for carrying out land acquisition and resolving land complaints / claims.</li> <li>- Based on document verification, public consultations and field visits indicate that there was no new land clearing after November 2005</li> </ul>	

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		<p>at PT Eastern Sumatra Indonesia, PT Kerasaan Indonesia and PT Timbang Deli Indonesia.</p> <p>Based on document verification, public consultations and field visits, it was shown that at the time of the audit there were no indications of land disputes between the company and other parties, including the surrounding community. However, in the period of 1995, there was a land dispute case between the community (Hendrik Sihombing Group) and the company and it was resolved through the Simalungun District Court as a last resort. In 1996 an appeal was filed and in 1998 an appeal was made and it was decided in 2000 through the Supreme Court Letter No. 413 / H / 2000 / 830.K / PDT / 1998 dated 31 July 2000 as a copy of the Decision of the Supreme Court of the Republic of Indonesia at cassation level on 24 February 2000 Reg.No.830.K / PDT1998 in the case of Hendrik Sihombing et al with PT. SIPEF Indonesia (Eastern Sumatra Indonesia). In 2015, several residents through the Pagaraja Group made a Return claim against the same object but were rejected by the Simalungun District Court on the grounds that the object of the lawsuit was the same object as the case of Hendrik Sihombing's group.</p>	
4.4.3	<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>Based on document verification and statements from related agencies, it is also shown that PT Eastern Sumatra Indonesia, PT Kerasaan Indonesia and PT Timbang Deli Indonesia have not done any new land clearing after November 2005, however they already have several procedures to settle land compensation if they plan to open a plantation. new, namely:</p> <ol style="list-style-type: none"> <li>a. PT Eastern Sumatra Indonesia and PT Kerasaan Indonesia: The mechanism used to implement land compensation prior to the opening of new land as outlined in document No. LCA-01-01 / 23-09-2020 / Rev 2 (Land and Planting Compensation inside Location Permit of The Company) signed by Management on September 28, 2020.</li> <li>b. PT Timbang Deli Indonesia: The mechanism used for the implementation of land compensation before new land clearing as</li> </ol>	Complied



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		<p>outlined in the SOP document No .: SOP / TDI / 02, Rev 1, (Land compensation procedure) signed by Management on February 1, 2019.</p> <p>Based on the verification of the two documents, it shows that therein describes the procedures for land acquisition starting from the land acquisition plan, data collection and land measurement by involving the village government and witnessed by adjacent parties, preparing land compensation documents (GRTT approval letter, owner data land, land tenure certificate, non-conflict certificate etc.), final review from RMO, approval from HO office, GRTT implementation.</p>	
4.4.4	<p>All relevant information is available in appropriate forms and languages, including assessment of impact, proposed benefit sharing, and legal arrangements.</p>	<p>Based on document verification and information from related agencies, it also shows that PT Eastern Sumatra Indonesia, PT Kerasaan Indonesia and PT Timbang Deli Indonesia have not done any new land clearing, however, they already have several procedures to settle land compensation if they plan to open new plantations, namely :</p> <ul style="list-style-type: none"> <li>a. PT Eastern Sumatra Indonesia and PT Kerasaan Indonesia: The mechanism used to implement land compensation prior to the opening of new land as outlined in document No. LCA-01-01 / 23-09-2020 / Rev 2 (Land and Planting Compensation inside Location Permit of The Company) signed by Management on September 28, 2020.</li> <li>b. PT Timbang Deli Indonesia: The mechanism used for the implementation of land compensation before new land clearing as outlined in the SOP document No .: SOP / TDI / 02, Rev 1, (Land compensation procedure) signed by Management on February 1, 2019.</li> </ul> <p>Based on the verification of the two documents, it shows that therein describes the procedures for land acquisition starting from the land acquisition plan, data collection and land measurement by involving the village government and witnessed by adjacent parties, preparing land</p>	Complied

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		<p>compensation documents (GRTT approval letter, owner data land, land tenure certificate, non-conflict certificate etc.), final review from RMO, approval from HO office, GRTT implementation.</p> <p>All environmental impact assessment documents and SIA including monitoring reports are documents that can be accessed by the public and available in Indonesian.</p>	
4.4.5	<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>As described in indicator 4.4.1, it shows that:</p> <ul style="list-style-type: none"> <li>- The company has a procedure that is used as a reference for carrying out land acquisition and resolving land complaints / claims.</li> <li>- Based on document verification, public consultations and field visits indicate that there was no new land clearing after November 2005 at PT Eastern Sumatra Indonesia, PT Kerasaan Indonesia and PT Timbang Deli Indonesia.</li> </ul> <p>Based on document verification, public consultations and field visits, it was shown that at the time of the audit there were no indications of land disputes between the company and other parties, including the surrounding community. However, in the period of 1995, there was a land dispute case between the community (Hendrik Sihombing Group) and the company and it was resolved through the Simalungun District Court as a last resort. In 1996 an appeal was filed and in 1998 an appeal was made and it was decided in 2000 through the Supreme Court Letter No. 413 / H / 2000 / 830.K / PDT / 1998 dated 31 July 2000 as a copy of the Decision of the Supreme Court of the Republic of Indonesia at cassation level on 24 February 2000 Reg.No.830.K / PDT1998 in the case of Hendrik Sihombing et al with PT. SIPEF Indonesia (Eastern Sumatra Indonesia). In 2015, several residents through the Pagaraja Group made a Return claim against the same object but were rejected by the Simalungun District Court on the grounds that the object of the lawsuit was the same object as the case of Hendrik Sihombing's group.</p>	Complied

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4.4.6	There is evidence that implementation of agreement negotiated through FPIC is annually reviewed in consultation with affected parties.	<p>As described in indicator 4.4.1, it shows that:</p> <ul style="list-style-type: none"> <li>- The company has a procedure that is used as a reference for carrying out land acquisition and resolving land complaints / claims.</li> <li>- Based on document verification, public consultations and field visits indicate that there was no new land clearing after November 2005 at PT Eastern Sumatra Indonesia, PT Kerasaan Indonesia and PT Timbang Deli Indonesia.</li> </ul> <p>Based on document verification, public consultations and field visits, it was shown that at the time of the audit there were no indications of land disputes between the company and other parties, including the surrounding community. However, in the period of 1995, there was a land dispute case between the community (Hendrik Sihombing Group) and the company and it was resolved through the Simalungun District Court as a last resort. In 1996 an appeal was filed and in 1998 an appeal was made and it was decided in 2000 through the Supreme Court Letter No. 413 / H / 2000 / 830.K / PDT / 1998 dated 31 July 2000 as a copy of the Decision of the Supreme Court of the Republic of Indonesia at cassation level on 24 February 2000 Reg.No.830.K / PDT1998 in the case of Hendrik Sihombing et al with PT. SIPEF Indonesia (Eastern Sumatra Indonesia). In 2015, several residents through the Pagaraja Group made a Return claim against the same object but were rejected by the Simalungun District Court on the grounds that the object of the lawsuit was the same object as the case of Hendrik Sihombing's group.</p>	Complied
<p><b>Criteria 4.5:</b> 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	<b>(C)</b> Documents showing identification and assessment of demonstrable legal, customary and user rights are available.	Based on legal document verification, audit team gather information all concession under HGU of PT Eastern Sumatra Indonesia was obtained from government which was "Hak Barat (Hak erfpahct)" conversion to SIPEF Group – as documented under "Agreement between Government of Indonesia and <i>Societe Internationale de Plantations Et de Finance S.A-</i>	Complied

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		<p><i>SIPEF</i> (Belgium)" dated 29 April 1968.</p> <p>Based on document verification and statement from government officials, audit team gather information PT Eastern Sumatra Indonesia did not conduct any new land clearing since November 2005. However, company established procedure for settling land compensation if new land clearing is necessary for plantation expansion. The procedure established in "Land and Planting Compensation inside Izin Lokasi of The Company No.LCA-01-01/23-09-2020/Rev.2" signed by management on 28 September 2020.</p> <p>As explained under indicator 4.4.1 shows:</p> <ul style="list-style-type: none"> <li>• Company has established procedure to be use as guideline to land compensation and complaint/land claim.</li> <li>• Based on document verification, public consultation and field visit shows within PT Eastern Sumatra Indonesia, there was no new land clearing since November 2005.</li> </ul>	
<p>4.5.2</p>	<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. All the relevant information and documents are made available, and community have option of resourced access to independent third-party advice through a documented, long-term and two- way process of consultation and negotiation.</p>	<p>Based on legal document verification, audit team gather information all concession under HGU of PT Eastern Sumatra Indonesia was obtained from government which was "Hak Barat (Hak erfpahct)" conversion to SIPEF Group – as documented under "Agreement between Government of Indonesia and <i>Societe Internationale de Plantations Et de Finance S.A-SIPEF</i> (Belgium)" dated 29 April 1968.</p> <p>Based on document verification and statement from government officials, audit team gather information PT Eastern Sumatra Indonesia did not conduct any new land clearing since November 2005. However, company established procedure for settling land compensation if new land clearing is necessary for plantation expansion. The procedure established in "Land and Planting Compensation inside Izin Lokasi of The Company No.LCA-01-01/23-09-2020/Rev.2" signed by management on 28 September 2020.</p>	<p>Complied</p>

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		<p>As explained under indicator 4.4.1 shows:</p> <ul style="list-style-type: none"> <li>• Company has established procedure to be use as guideline to land compensation and complaint/land claim.</li> <li>• Based on document verification, public consultation and field visit shows within PT Eastern Sumatra Indonesia, there was no new land clearing since November 2005.</li> </ul>	
4.5.3	<p>Evidence is available that affected local peoples understand they have the right to say 'agree' or 'not agree' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p>	<p>Based on legal document verification, audit team gather information all concession under HGU of PT Eastern Sumatra Indonesia was obtained from government which was "Hak Barat (Hak erfpahct)" conversion to SIPEF Group – as documented under "Agreement between Government of Indonesia and <i>Societe Internationale de Plantations Et de Finance S.A-SIPEF (Belgium)</i>" dated 29 April 1968.</p> <p>Based on document verification and statement from government officials, audit team gather information PT Eastern Sumatra Indonesia did not conduct any new land clearing since November 2005. However, company established procedure for settling land compensation if new land clearing is necessary for plantation expansion. The procedure established in "Land and Planting Compensation inside Izin Lokasi of The Company No.LCA-01-01/23-09-2020/Rev.2" signed by management on 28 September 2020.</p> <p>As explained under indicator 4.4.1 shows:</p> <ul style="list-style-type: none"> <li>• Company has established procedure to be use as guideline to land compensation and complaint/land claim.</li> <li>• Based on document verification, public consultation and field visit shows within PT Eastern Sumatra Indonesia, there was no new land clearing since November 2005.</li> </ul>	Complied
4.5.4	<p>To ensure local food and water security and as part of the FPIC process, SEIA participation and participatory land-use planning with local peoples,</p>	<p>Based on legal document verification, audit team gather information all concession under HGU of PT Eastern Sumatra Indonesia was obtained from government which was "Hak Barat (Hak erfpahct)" conversion to</p>	Complied

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	<p>the full range of food and water provisioning options are considered. There is transparency of land allocations process.</p>	<p>SIPEF Group – as documented under “Agreement between Government of Indonesia and <i>Societe Internationale de Plantations Et de Finance S.A-SIPEF</i> (Belgium)” dated 29 April 1968.</p> <p>Based on document verification and statement from government officials, audit team gather information PT Eastern Sumatra Indonesia did not conduct any new land clearing since November 2005. However, company established procedure for settling land compensation if new land clearing is necessary for plantation expansion. The procedure established in “Land and Planting Compensation inside Izin Lokasi of The Company No.LCA-01-01/23-09-2020/Rev.2” signed by management on 28 September 2020.</p> <p>As explained under indicator 4.4.1 shows:</p> <ul style="list-style-type: none"> <li>• Company has established procedure to be use as guideline to land compensation and complaint/land claim.</li> <li>• Based on document verification, public consultation and field visit shows within PT Eastern Sumatra Indonesia, there was no new land clearing since November 2005.</li> </ul>	
<p>4.5.5</p>	<p>Evidence is available that the affected communities and rights holders have had the option to access information and advice, that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.</p>	<p>Based on legal document verification, audit team gather information all concession under HGU of PT Eastern Sumatra Indonesia was obtained from government which was “Hak Barat (Hak erfpahct)” conversion to SIPEF Group – as documented under “Agreement between Government of Indonesia and <i>Societe Internationale de Plantations Et de Finance S.A-SIPEF</i> (Belgium)” dated 29 April 1968.</p> <p>Based on document verification and statement from government officials, audit team gather information PT Eastern Sumatra Indonesia did not conduct any new land clearing since November 2005. However, company established procedure for settling land compensation if new land clearing is necessary for plantation expansion. The procedure established in “Land and Planting Compensation inside Izin Lokasi of The Company No.LCA-01-01/23-09-2020/Rev.2” signed by management on 28 September</p>	<p>Complied</p>

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		<p>2020.</p> <p>As explained under indicator 4.4.1 shows:</p> <ul style="list-style-type: none"> <li>• Company has established procedure to be use as guideline to land compensation and complaint/land claim.</li> <li>• Based on document verification, public consultation and field visit shows within PT Eastern Sumatra Indonesia, there was no new land clearing since November 2005.</li> </ul> <p>Based on document verification upon Environmental Impact Evaluation year 2006 "Kajian Dampak Lingkungan (Revisi Dokumen RKL-RPL tahun 2006)" shows no identified land use by indigenous people or other land use inside HGU area of PT Eastern Sumatra Indonesia.</p> <p>In year 2009, PT Eastern Sumatra Indonesia carried out HCV Identification Assessment and in year 2010, company carried out Social Impact Assessment; based on verification of both documents shows no identified land use by indigenous people or other land use inside HGU area of PT Eastern Sumatra Indonesia. The HCV assessment process and social impact assessment has involved multi-stakeholder through guided interview process, questionnaire filling and focus group discussion (FGD).</p> <p>Based on stakeholder consultation with Plantation Services and Environmental Services – Dinas Perkebunan and Dinas Lingkungan Hidup Simalungun Regency; interview with surrounding communities, audit team gather information that no identified land use by indigenous people or other land use inside HGU area of PT Eastern Sumatra Indonesia.</p>	
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 legal document verification, audit team gather information all concession under HGU of PT Eastern Sumatra Indonesia was obtained from government which was "Hak Barat (Hak erfpahct)" conversion to SIPEF Group – as documented under "Agreement between Government of Indonesia and <i>Societe Internationale de Plantations Et de Finance S.A-</i>	Complied

		<p><i>SIPEF</i> (Belgium)" dated 29 April 1968.</p> <p>Based on document verification and statement from government officials, audit team gather information PT Eastern Sumatra Indonesia did not conduct any new land clearing since November 2005. However, company established procedure for settling land compensation if new land clearing is necessary for plantation expansion. The procedure established in "Land and Planting Compensation inside Izin Lokasi of The Company No.LCA-01-01/23-09-2020/Rev.2" signed by management on 28 September 2020.</p> <p>As explained under indicator 4.4.1 shows:</p> <ul style="list-style-type: none"> <li>• Company has established procedure to be use as guideline to land compensation and complaint/land claim.</li> <li>• Based on document verification, public consultation and field visit shows within PT Eastern Sumatra Indonesia, there was no new land clearing since November 2005.</li> </ul> <p>Based on document verification upon Environmental Impact Evaluation year 2006 "Kajian Dampak Lingkungan (Revisi Dokumen RKL-RPL tahun 2006)" shows no identified land use by indigenous people or other land use inside HGU area of PT Eastern Sumatra Indonesia.</p> <p>In year 2009, PT Eastern Sumatra Indonesia carried out HCV Identification Assessment and in year 2010, company carried out Social Impact Assessment; based on verification of both documents shows no identified land use by indigenous people or other land use inside HGU area of PT Eastern Sumatra Indonesia. The HCV assessment process and social impact assessment has involved multi-stakeholder through guided interview process, questionnaire filling and focus group discussion (FGD).</p> <p>Based on stakeholder consultation with Plantation Services and Environmental Services – Dinas Perkebunan and Dinas Lingkungan Hidup Simalungun Regency; interview with surrounding communities,</p>	
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		<p>audit team gather information that no identified land use by indigenous people or other land use inside HGU area of PT Eastern Sumatra Indonesia.</p>	
<p>4.5.7</p>	<p>After 15 November 2018, new lands will not be acquired for plantations and mills as a result of recent (after November 2005) expropriations in the national interest (eminent domain) without FPIC process, except in cases of smallholders benefitting from agrarian reform or anti-drug programmes.</p>	<p>Based on legal document verification, audit team gather information all concession under HGU of PT Eastern Sumatra Indonesia was obtained from government which was "Hak Barat (Hak erfpahct)" conversion to SIPEF Group – as documented under "Agreement between Government of Indonesia and <i>Societe Internationale de Plantations Et de Finance S.A-SIPEF</i> (Belgium)" dated 29 April 1968.</p> <p>Based on document verification and statement from government officials, audit team gather information PT Eastern Sumatra Indonesia did not conduct any new land clearing since November 2005. However, company established procedure for settling land compensation if new land clearing is necessary for plantation expansion. The procedure established in "Land and Planting Compensation inside Izin Lokasi of The Company No.LCA-01-01/23-09-2020/Rev.2" signed by management on 28 September 2020.</p> <p>As explained under indicator 4.4.1 shows:</p> <ul style="list-style-type: none"> <li>• Company has established procedure to be use as guideline to land compensation and complaint/land claim.</li> <li>• Based on document verification, public consultation and field visit shows within PT Eastern Sumatra Indonesia, there was no new land clearing since November 2005.</li> </ul> <p>Based on document verification upon Environmental Impact Evaluation year 2006 "Kajian Dampak Lingkungan (Revisi Dokumen RKL-RPL tahun 2006)" shows no identified land use by indigenous people or other land use inside HGU area of PT Eastern Sumatra Indonesia.</p> <p>In year 2009, PT Eastern Sumatra Indonesia carried out HCV Identification Assessment and in year 2010, company carried out Social Impact Assessment; based on verification of both documents shows no</p>	<p>Complied</p>

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		<p>identified land use by indigenous people or other land use inside HGU area of PT Eastern Sumatra Indonesia. The HCV assessment process and social impact assessment has involved multi-stakeholder through guided interview process, questionnaire filling and focus group discussion (FGD).</p> <p>Based on stakeholder consultation with Plantation Services and Environmental Services – Dinas Perkebunan and Dinas Lingkungan Hidup Simalungun Regency; interview with surrounding communities, audit team gather information that no identified land use by indigenous people or other land use inside HGU area of PT Eastern Sumatra Indonesia.</p>	
4.5.8	<p><b>(C)</b> New lands are not acquired in areas inhabited by communities in voluntary isolation.</p>	<p>Based on legal document verification, audit team gather information all concession under HGU of PT Eastern Sumatra Indonesia was obtained from government which was "Hak Barat (Hak erfpahct)" conversion to SIPEF Group – as documented under "Agreement between Government of Indonesia and <i>Societe Internationale de Plantations Et de Finance S.A-SIPEF</i> (Belgium)" dated 29 April 1968.</p> <p>Based on document verification and statement from government officials, audit team gather information PT Eastern Sumatra Indonesia did not conduct any new land clearing since November 2005. However, company established procedure for settling land compensation if new land clearing is necessary for plantation expansion. The procedure established in "Land and Planting Compensation inside Izin Lokasi of The Company No.LCA-01-01/23-09-2020/Rev.2" signed by management on 28 September 2020.</p> <p>As explained under indicator 4.4.1 shows:</p> <ul style="list-style-type: none"> <li>• Company has established procedure to be use as guideline to land compensation and complaint/land claim.</li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>Based on document verification, public consultation and field visit shows within PT Eastern Sumatra Indonesia, there was no new land clearing since November 2005.</li> </ul> <p>Based on document verification upon Environmental Impact Evaluation year 2006 "Kajian Dampak Lingkungan (Revisi Dokumen RKL-RPL tahun 2006)" shows no identified land use by indigenous people or other land use inside HGU area of PT Eastern Sumatra Indonesia.</p> <p>In year 2009, PT Eastern Sumatra Indonesia carried out HCV Identification Assessment and in year 2010, company carried out Social Impact Assessment; based on verification of both documents shows no identified land use by indigenous people or other land use inside HGU area of PT Eastern Sumatra Indonesia. The HCV assessment process and social impact assessment has involved multi-stakeholder through guided interview process, questionnaire filling and focus group discussion (FGD).</p> <p>Based on stakeholder consultation with Plantation Services and Environmental Services – Dinas Perkebunan and Dinas Lingkungan Hidup Simalungun Regency; interview with surrounding communities, audit team gather information that no identified land use by indigenous people or other land use inside HGU area of PT Eastern Sumatra Indonesia.</p>	
<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>			
4.6.1	<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>Based on legal document verification, audit team gather information all concession under HGU of PT Eastern Sumatra Indonesia was obtained from government which was "Hak Barat (Hak erfpahct)" conversion to SIPEF Group – as documented under "Agreement between Government of Indonesia and <i>Societe Internationale de Plantations Et de Finance S.A-SIPEF</i> (Belgium)" dated 29 April 1968.</p> <p>Based on document verification and statement from government officials,</p>	Complied

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		<p>audit team gather information PT Eastern Sumatra Indonesia did not conduct any new land clearing since November 2005. However, company established procedure for settling land compensation if new land clearing is necessary for plantation expansion. The procedure established in "Land and Planting Compensation inside Izin Lokasi of The Company No.LCA-01-01/23-09-2020/Rev.2" signed by management on 28 September 2020.</p> <p>As explained under indicator 4.4.1 shows:</p> <ul style="list-style-type: none"> <li>• Company has established procedure to be use as guideline to land compensation and complaint/land claim.</li> <li>• Based on document verification, public consultation and field visit shows within PT Eastern Sumatra Indonesia, there was no new land clearing since November 2005.</li> </ul> <p>Based on document evaluation, the procedure explains flow process to land clearing started from planning, inventory land, land measurement involving village government and witnessed by neighbouring entity, prepare the compensation administration (agreement for land compensation, landowner data, legal ownership of the land, statement letter the land free of conflict, etc.), review from Regional Management Office, approval from Head Office Medan, record of implementation land compensation.</p>	
4.6.2	<p><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.</p>	<p>Based on legal document verification, audit team gather information all concession under HGU of PT Eastern Sumatra Indonesia was obtained from government which was "Hak Barat (Hak erfpahct)" conversion to SIPEF Group – as documented under "Agreement between Government of Indonesia and <i>Societe Internationale de Plantations Et de Finance S.A-SIPEF</i> (Belgium)" dated 29 April 1968.</p> <p>Based on document verification and statement from government officials, audit team gather information PT Eastern Sumatra Indonesia did not conduct any new land clearing since November 2005. However, company</p>	Complied

		<p>established procedure for settling land compensation if new land clearing is necessary for plantation expansion. The procedure established in "Land and Planting Compensation inside Izin Lokasi of The Company No.LCA-01-01/23-09-2020/Rev.2" signed by management on 28 September 2020.</p> <p>As explained under indicator 4.4.1 shows:</p> <ul style="list-style-type: none"> <li>• Company has established procedure to be use as guideline to land compensation and complaint/land claim.</li> <li>• Based on document verification, public consultation and field visit shows within PT Eastern Sumatra Indonesia, there was no new land clearing since November 2005.</li> </ul> <p>Based on document evaluation, the procedure explains flow process to land clearing started from planning, inventory land, land measurement involving village government and witnessed by neighbouring entity, prepare the compensation administration (agreement for land compensation, landowner data, legal ownership of the land, statement letter the land free of conflict, etc.), review from Regional Management Office, approval from Head Office Medan, record of implementation land compensation.</p>	
4.6.3	Evidence is available that equal opportunities are provided to both men and women to hold land titles for smallholdings (if possible based on local law, customs and/or agreement).	<p>Based on the verification of legality documents as well as the results of consultations with local residents, it was stated that the plantation areas of PT Eastern Sumatra Indonesia, PT Kerasaan Indonesia and PT Timbang Deli Indonesia had been built since the Dutch East Indies government and there was no new land clearing for oil palm plantations after November 2005.</p> <p>Each company has conducted an Environmental Impact Assessment as described in criterion 3.4, a Social Impact Assessment as described in criterion 4.3 and an HCV Assessment as described in criterion 7.12. Based on the verification of the three documents, it shows that there are no identifiable uses of land by customary law communities and other use</p>	Complied

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		<p>rights in the HGU areas of PT Eastern Sumatra Indonesia, PT Kerasaan Indonesia and PT Timbang Deli Indonesia.</p> <p>However, the Certification Unit already has a procedure that is used as a reference for land acquisition. PT Eastern Sumatra Indonesia, PT Kerasaan Indonesia and PT Timbang Deli Indonesia have stopped clearing new land after November 2005, however they have several procedures to settle compensation. land if you are going to open a new plantation, namely:</p> <ul style="list-style-type: none"> <li>a. PT Eastern Sumatra Indonesia and PT Kerasaan Indonesia: The mechanism used to implement land compensation prior to the opening of new land as outlined in document No. LCA-01-01 / 23-09-2020 / Rev 2 (Land and Planting Compensation inside Location Permit of The Company) signed by Management on September 28, 2020.</li> <li>b. PT Timbang Deli Indonesia: The mechanism used for the implementation of land compensation before new land clearing as outlined in the SOP document No. : SOP / TDI / 02, Rev 1, (Land compensation procedure) signed by Management on February 1, 2019.</li> </ul> <p>Based on the verification of the two documents, it shows that therein describes the procedures for land acquisition starting from the land acquisition plan, data collection and land measurement by involving the village government and witnessed by adjacent parties, preparing land compensation documents (GRTT approval letter, owner data land, land tenure certificate, non-conflict certificate etc.), final review from RMO, approval from HO office, GRTT implementation.</p>	
4.6.4	The process and outcomes of any negotiated agreements, compensation and payments are documented with evidence of the participation of affected parties and made available to them.	Based on the verification of legality documents as well as the results of consultations with local residents, it was stated that the plantation areas of PT Eastern Sumatra Indonesia, PT Kerasaan Indonesia and PT Timbang Deli Indonesia had been built since the Dutch East Indies government and there was no new land clearing for oil palm plantations	Complied

		<p>after November 2005.</p> <p>Each company has conducted an Environmental Impact Assessment as described in criterion 3.4, a Social Impact Assessment as described in criterion 4.3 and an HCV Assessment as described in criterion 7.12. Based on the verification of the three documents, it shows that there are no identifiable uses of land by customary law communities and other use rights in the HGU areas of PT Eastern Sumatra Indonesia, PT Kerasaan Indonesia and PT Timbang Deli Indonesia.</p> <p>However, the Certification Unit already has a procedure that is used as a reference for land acquisition. PT Eastern Sumatra Indonesia, PT Kerasaan Indonesia and PT Timbang Deli Indonesia have stopped clearing new land after November 2005, however they have several procedures to settle compensation. land if you are going to open a new plantation, namely:</p> <ol style="list-style-type: none"> <li>a. PT Eastern Sumatra Indonesia and PT Kerasaan Indonesia: The mechanism used to implement land compensation prior to the opening of new land as outlined in document No. LCA-01-01 / 23-09-2020 / Rev 2 (Land and Planting Compensation inside Location Permit of The Company) signed by Management on September 28, 2020.</li> <li>b. PT Timbang Deli Indonesia: The mechanism used for the implementation of land compensation before new land clearing as outlined in the SOP document No. : SOP / TDI / 02, Rev 1, (Land compensation procedure) signed by Management on February 1, 2019.</li> </ol> <p>Based on the verification of the two documents, it shows that therein describes the procedures for land acquisition starting from the land acquisition plan, data collection and land measurement by involving the village government and witnessed by adjacent parties, preparing land compensation documents (GRTT approval letter, owner data land, land</p>	
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		tenure certificate, non-conflict certificate etc.), final review from RMO, approval from HO office, GRTT implementation.	
<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.	<p>Based on legal document verification, audit team gather information all concession under HGU of PT Eastern Sumatra Indonesia was obtained from government which was "Hak Barat (Hak erfpahct)" conversion to SIPEF Group – as documented under "Agreement between Government of Indonesia and <i>Societe Internationale de Plantations Et de Finance S.A-SIPEF</i> (Belgium)" dated 29 April 1968.</p> <p>Based on document verification and statement from government officials, audit team gather information PT Eastern Sumatra Indonesia did not conduct any new land clearing since November 2005. However, company established procedure for settling land compensation if new land clearing is necessary for plantation expansion. The procedure established in "Land and Planting Compensation inside Izin Lokasi of The Company No.LCA-01-01/23-09-2020/Rev.2" signed by management on 28 September 2020.</p> <p>As explained under indicator 4.4.1 shows:</p> <ul style="list-style-type: none"> <li>• Company has established procedure to be use as guideline to land compensation and complaint/land claim.</li> <li>• Based on document verification, public consultation and field visit shows within PT Eastern Sumatra Indonesia, there was no new land clearing since November 2005.</li> </ul> <p>Based on document evaluation, the procedure explains flow process to land clearing started from planning, inventory land, land measurement involving village government and witnessed by neighbouring entity, prepare the compensation administration (agreement for land compensation, landowner data, legal ownership of the land, statement</p>	Complied



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		letter the land free of conflict, etc.), review from Regional Management Office, approval from Head Office Medan, record of implementation land compensation.	
4.7.2	<p><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.</p>	<p>Based on legal document verification, audit team gather information all concession under HGU of PT Eastern Sumatra Indonesia was obtained from government which was "Hak Barat (Hak erfpahct)" conversion to SIPEF Group – as documented under "Agreement between Government of Indonesia and <i>Societe Internationale de Plantations Et de Finance S.A-SIPEF</i> (Belgium)" dated 29 April 1968.</p> <p>Based on document verification and statement from government officials, audit team gather information PT Eastern Sumatra Indonesia did not conduct any new land clearing since November 2005. However, company established procedure for settling land compensation if new land clearing is necessary for plantation expansion. The procedure established in "Land and Planting Compensation inside Izin Lokasi of The Company No.LCA-01-01/23-09-2020/Rev.2" signed by management on 28 September 2020.</p> <p>As explained under indicator 4.4.1 shows:</p> <ul style="list-style-type: none"> <li>• Company has established procedure to be use as guideline to land compensation and complaint/land claim.</li> <li>• Based on document verification, public consultation and field visit shows within PT Eastern Sumatra Indonesia, there was no new land clearing since November 2005.</li> </ul> <p>Based on document evaluation, the procedure explains flow process to land clearing started from planning, inventory land, land measurement involving village government and witnessed by neighbouring entity, prepare the compensation administration (agreement for land compensation, landowner data, legal ownership of the land, statement letter the land free of conflict, etc.), review from Regional Management</p>	Complied

		Office, approval from Head Office Medan, record of implementation land compensation.	
4.7.3	Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.	<p>Based on legal document verification, audit team gather information all concession under HGU of PT Eastern Sumatra Indonesia was obtained from government which was "Hak Barat (Hak erfpahct)" conversion to SIPEF Group – as documented under "Agreement between Government of Indonesia and <i>Societe Internationale de Plantations Et de Finance S.A-SIPEF</i> (Belgium)" dated 29 April 1968.</p> <p>Based on document verification and statement from government officials, audit team gather information PT Eastern Sumatra Indonesia did not conduct any new land clearing since November 2005. However, company established procedure for settling land compensation if new land clearing is necessary for plantation expansion. The procedure established in "Land and Planting Compensation inside Izin Lokasi of The Company No.LCA-01-01/23-09-2020/Rev.2" signed by management on 28 September 2020.</p> <p>As explained under indicator 4.4.1 shows:</p> <ul style="list-style-type: none"> <li>• Company has established procedure to be use as guideline to land compensation and complaint/land claim.</li> <li>• Based on document verification, public consultation and field visit shows within PT Eastern Sumatra Indonesia, there was no new land clearing since November 2005.</li> </ul> <p>Based on document evaluation, the procedure explains flow process to land clearing started from planning, inventory land, land measurement involving village government and witnessed by neighbouring entity, prepare the compensation administration (agreement for land compensation, landowner data, legal ownership of the land, statement letter the land free of conflict, etc.), review from Regional Management Office, approval from Head Office Medan, record of implementation land compensation.</p>	Complied

<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	<p>Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.</p>	<p>Based on the verification of legality documents as well as the results of consultations with local residents, it was stated that the plantation areas of PT Eastern Sumatra Indonesia, PT Kerasaan Indonesia and PT Timbang Deli Indonesia had been built since the Dutch East Indies government and there was no new land clearing for oil palm plantations after November 2005.</p> <p>Each company has conducted an Environmental Impact Assessment as described in criterion 3.4, a Social Impact Assessment as described in criterion 4.3 and an HCV Assessment as described in criterion 7.12. Based on the verification of the three documents, it shows that there are no identifiable uses of land by customary law communities and other use rights in the HGU areas of PT Eastern Sumatra Indonesia, PT Kerasaan Indonesia and PT Timbang Deli Indonesia.</p> <p>Based on document verification, public consultations and field visits, there were no indications of land disputes between the company and other parties, including the surrounding community, although in PT Eastern Sumatra Indonesia there had been land claims by the community who named Hendrik Sihombing et al. year 1995 and has been resolved through the court process up to the cassation process which was decided in 2000 through the Supreme Court Letter No.413 / H / 2000 / 830.K / PDT / 1998 dated 31 July 2000 as a copy of the Decision of the Supreme Court of the Republic of Indonesia at the cassation level February 24, 2000 Reg.No.830.K / PDT1998 in the case of Hendrik Sihombing et al with PT. SIPEF Indonesia (Eastern Sumatra Indonesia). In 2015, several residents through Pagaraja reclaimed the same object but were rejected by the Simalungun District Court on the grounds that the object of the lawsuit was the same object as the case of the Hendrik Sihombing et al group in 1995. In 2018, several residents were members of the Pagaraja reports to the Police on the case of fraud / embezzlement of funds and</p>	Complied

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		<p>the person concerned is named a suspect by the Police and detained for 21 (03 - 24 February 2019), after being submitted for a suspension of detention and obtaining guarantees from the family, the Pagaraja chairman is released from Police custody on February 24, 2019. After going through the mediation process and court proceedings starting from the district court level, appeal and cassation during the period 2019 - 2020, on February 19, the decision of the Supreme Court (MA) Number: 341 K / Pid / 2020 was executed. April 20, 2020, stated the defendant Br. Elperiansyah Nasution (Chairman of Pagaraja) was legally and convincingly proven guilty of a criminal act of fraud. This is as regulated and punishable under Article 378 of the Criminal Code (KUHP). Therefore, Bro. Elperiansyah was sentenced to prison for 1.6 years.</p> <p>The conclusion is that the disputes that occurred in 2020 are not directly related to land disputes with PT Eastern Sumatra Indonesia.</p>	
4.8.2	<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>Based on the verification of legality documents as well as the results of consultations with local residents, it was stated that the plantation areas of PT Eastern Sumatra Indonesia, PT Kerasaan Indonesia and PT Timbang Deli Indonesia had been built since the Dutch East Indies government and there was no new land clearing for oil palm plantations after November 2005.</p> <p>Each company has conducted an Environmental Impact Assessment as described in criterion 3.4, a Social Impact Assessment as described in criterion 4.3 and an HCV Assessment as described in criterion 7.12. Based on the verification of the three documents, it shows that there are no identifiable uses of land by customary law communities and other use rights in the HGU areas of PT Eastern Sumatra Indonesia, PT Kerasaan Indonesia and PT Timbang Deli Indonesia.</p> <p>Based on document verification, public consultations and field visits, there are no indications of land disputes between the company and other parties, including the surrounding community.</p>	Complied

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		<p>PT Eastern Sumatra Indonesia and PT Kerasaan Indonesia already have procedures that are used to resolve disputes / complaints from parties, such as:</p> <ul style="list-style-type: none"> <li>a. The mechanism used to resolve conflicts due to illegal cultivation within the HGU area is set out in Document No. LCA-01-03 / 01-02-2020 / Rev 0 (Illegal Planting and Building Owned by Third Party Inside HGU of The Company) signed by Management on 18 February 2020.</li> <li>b. The company has developed a complaint mechanism as stipulated in SOP No. IAD-01-08 / 22-01-2020 / Rev.0 (Grievance Procedure) signed by the President Director on January 30, 2020.</li> </ul> <p>Based on document verification, statements from related agencies and field visits indicate that PT Timbang Deli Indonesia has not cleared new land, however, they already have several procedures for resolving disputes, namely:</p> <ul style="list-style-type: none"> <li>a. The mechanism used for the implementation of land compensation before new land clearing is outlined in the SOP document No SOP / TDI / 02, Rev 1, (Land compensation Procedure) signed by Management on February 1, 2019.</li> <li>b. The company has developed a complaint mechanism from external parties as stipulated in SOP No. SOP / TD07, Rev.1 (Grievance Procedure with External Parties) signed by Management on February 1, 2019.</li> </ul> <p>As described in indicator 4.2.3 which states that there is 1 dispute case in PT Kerasaan Indonesia concerning "Industrial Relations Dispute". The company has shown evidence of the involvement of other parties as a mediator, in this case the Mediator from the Manpower Office of Simalungun Regency but did not get an agreement between the two parties. The auditors have carried out in-depth verification of the case, both document verification and interviews with management and the</p>	
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		<p>Workers' Union as well as with the Manpower Office Mediator. Based on the information from the Mediator, it is stated that there is currently 1 case of serious industrial relations between one of the former employees with PT Kerasaan Indonesia where mediation has been carried out by the Manpower Office but has not received an agreement so that both parties agree to proceed the case to the industrial relations court. . Management can show evidence of the industrial relations dispute settlement process properly and is currently still waiting for the industrial relations court process.</p> <p>Whereas at PT Timbang Deli Indonesia there was 1 complaint submitted by the surrounding community regarding the prohibition of grazing livestock in the PT Timbang Deli Indonesia concession area even though the Company still allowed the community to take grass in the PT Kerasaan HGU area which was very much needed by goat and cow breeders in the village area. around the company. Regarding the complaint, a coordination meeting was held between PT Timbang Deli Indonesia and representatives of breeders around the company on March 4, 2021 which was attended by 13 participants.</p>	
4.8.3	<p>Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4).</p>	<p>Based on the verification of legality documents as well as the results of consultations with local residents, it was stated that the plantation areas of PT Eastern Sumatra Indonesia, PT Kerasaan Indonesia and PT Timbang Deli Indonesia had been built since the Dutch East Indies government and there was no new land clearing for oil palm plantations after November 2005.</p> <p>Each company has conducted an Environmental Impact Assessment as described in criterion 3.4, a Social Impact Assessment as described in criterion 4.3 and an HCV Assessment as described in criterion 7.12. Based on the verification of the three documents, it shows that there are no identifiable uses of land by customary law communities and other use rights in the HGU areas of PT Eastern Sumatra Indonesia, PT Kerasaan</p>	Complied

		<p>Indonesia and PT Timbang Deli Indonesia.</p> <p>Based on document verification, public consultations and field visits, there are no indications of land disputes between the company and other parties, including the surrounding community.</p> <p>PT Eastern Sumatra Indonesia and PT Kerasaan Indonesia already have procedures that are used to resolve disputes / complaints from parties, such as:</p> <ol style="list-style-type: none"> <li>a. The mechanism used to resolve conflicts due to illegal cultivation within the HGU area is set out in Document No. LCA-01-03 / 01-02-2020 / Rev 0 (Illegal Planting and Building Owned by Third Party Inside HGU of The Company) signed by Management on 18 February 2020.</li> <li>b. The company has developed a complaint mechanism as stipulated in SOP No. IAD-01-08 / 22-01-2020 / Rev.0 (Grievance Procedure) signed by the President Director on January 30, 2020.</li> </ol> <p>Based on document verification, statements from related agencies and field visits indicate that PT Timbang Deli Indonesia has not cleared new land, however, they already have several procedures for resolving disputes, namely:</p> <ol style="list-style-type: none"> <li>a. The mechanism used for the implementation of land compensation before new land clearing is outlined in the SOP document No SOP / TDI / 02, Rev 1, (Land compensation Procedure) signed by Management on February 1, 2019.</li> <li>b. The company has developed a complaint mechanism from external parties as stipulated in SOP No. SOP / TD07, Rev.1 (Grievance Procedure with External Parties) signed by Management on February 1, 2019.</li> </ol> <p>As described in indicator 4.2.3 which states that there is 1 dispute case in PT Kerasaan Indonesia concerning "Industrial Relations Dispute". The company has shown evidence of the involvement of other parties as a</p>	
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		<p>mediator, in this case the Mediator from the Manpower Office of Simalungun Regency but did not get an agreement between the two parties. The auditors have carried out in-depth verification of the case, both document verification and interviews with management and the Workers' Union as well as with the Manpower Office Mediator. Based on the information from the Mediator, it is stated that there is currently 1 case of serious industrial relations between one of the former employees with PT Kerasaan Indonesia where mediation has been carried out by the Manpower Office but has not received an agreement so that both parties agree to proceed the case to the industrial relations court. . Management can show evidence of the industrial relations dispute settlement process properly and is currently still waiting for the industrial relations court process.</p> <p>Whereas at PT Timbang Deli Indonesia there was 1 complaint submitted by the surrounding community regarding the prohibition of grazing livestock in the PT Timbang Deli Indonesia concession area even though the Company still allowed the community to take grass in the PT Kerasaan HGU area which was very much needed by goat and cow breeders in the village area. around the company. Regarding the complaint, a coordination meeting was held between PT Timbang Deli Indonesia and representatives of breeders around the company on March 4, 2021 which was attended by 13 participants.</p>	
4.8.4	<p>For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable).</p>	<p>Based on the verification of legality documents as well as the results of consultations with local residents, it was stated that the plantation areas of PT Eastern Sumatra Indonesia, PT Kerasaan Indonesia and PT Timbang Deli Indonesia had been built since the Dutch East Indies government and there was no new land clearing for oil palm plantations after November 2005.</p> <p>Each company has conducted an Environmental Impact Assessment as described in criterion 3.4, a Social Impact Assessment as described in criterion 4.3 and an HCV Assessment as described in criterion 7.12. Based</p>	Complied



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		<p>on the verification of the three documents, it shows that there are no identifiable uses of land by customary law communities and other use rights in the HGU areas of PT Eastern Sumatra Indonesia, PT Kerasaan Indonesia and PT Timbang Deli Indonesia.</p> <p>Based on document verification, public consultations and field visits, there are no indications of land disputes between the company and other parties, including the surrounding community.</p> <p>PT Eastern Sumatra Indonesia and PT Kerasaan Indonesia already have procedures that are used to resolve disputes / complaints from parties, such as:</p> <ol style="list-style-type: none"> <li>a. The mechanism used to resolve conflicts due to illegal cultivation within the HGU area is set out in Document No. LCA-01-03 / 01-02-2020 / Rev 0 (Illegal Planting and Building Owned by Third Party Inside HGU of The Company) signed by Management on 18 February 2020.</li> <li>b. The company has developed a complaint mechanism as stipulated in SOP No. IAD-01-08 / 22-01-2020 / Rev.0 (Grievance Procedure) signed by the President Director on January 30, 2020.</li> </ol> <p>Based on document verification, statements from related agencies and field visits indicate that PT Timbang Deli Indonesia has not cleared new land, however, they already have several procedures for resolving disputes, namely:</p> <ol style="list-style-type: none"> <li>a. The mechanism used for the implementation of land compensation before new land clearing is outlined in the SOP document No SOP / TDI / 02, Rev 1, (Land compensation Procedure) signed by Management on February 1, 2019.</li> <li>b. The company has developed a complaint mechanism from external parties as stipulated in SOP No. SOP / TD07, Rev.1 (Grievance Procedure with External Parties) signed by Management on February 1, 2019.</li> </ol>	
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		<p>As described in indicator 4.2.3 which states that there is 1 dispute case in PT Kerasaan Indonesia concerning "Industrial Relations Dispute". The company has shown evidence of the involvement of other parties as a mediator, in this case the Mediator from the Manpower Office of Simalungun Regency but did not get an agreement between the two parties. The auditors have carried out in-depth verification of the case, both document verification and interviews with management and the Workers' Union as well as with the Manpower Office Mediator. Based on the information from the Mediator, it is stated that there is currently 1 case of serious industrial relations between one of the former employees with PT Kerasaan Indonesia where mediation has been carried out by the Manpower Office but has not received an agreement so that both parties agree to proceed the case to the industrial relations court. . Management can show evidence of the industrial relations dispute settlement process properly and is currently still waiting for the industrial relations court process.</p> <p>Whereas at PT Timbang Deli Indonesia there was 1 complaint submitted by the surrounding community regarding the prohibition of grazing livestock in the PT Timbang Deli Indonesia concession area even though the Company still allowed the community to take grass in the PT Kerasaan HGU area which was very much needed by goat and cow breeders in the village area. around the company. Regarding the complaint, a coordination meeting was held between PT Timbang Deli Indonesia and representatives of breeders around the company on March 4, 2021 which was attended by 13 participants.</p>	
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<p><b>Principle 5: Support smallholder inclusion</b></p>
<p>Include smallholders in RSPO supply chains and improve their livelihoods through fair and transparent partnerships.</p>
<p><b>Criteria 5.1:</b> The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.</p>

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5.1.1	Current and previous period prices for FFB are publicly available and accessible by smallholders.	Based on document verification, interviews with related parties as well as field visits to plantations and mills show that up to the implementation of the Audit, Bukit Maradja POM only processed FFB originating from the nucleus estate which consists of Bukit Maradja Estate, Kerasaan Estate and Timbang Deli Estate.	Not Applicable
5.1.2	<b>(C)</b> Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.	Based on document verification, interviews with related parties as well as field visits to plantations and mills show that up to the implementation of the Audit, Bukit Maradja POM only processed FFB originating from the nucleus estate which consists of Bukit Maradja Estate, Kerasaan Estate and Timbang Deli Estate.	Not Applicable
5.1.3	<b>(C)</b> Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.	Based on document verification, interviews with related parties as well as field visits to plantations and mills show that up to the implementation of the Audit, Bukit Maradja POM only processed FFB originating from the nucleus estate which consists of Bukit Maradja Estate, Kerasaan Estate and Timbang Deli Estate.	Not Applicable
5.1.4	<b>(C)</b> Evidences is available that all parties, including women and independent representative organization assisting smallholders where requested, are involved in the decision making processes and understand the contracts. These include involving finance, loans/credits, and repayments through FFB price reductions for replanting and/or, other support mechanisms where applicable.	Based on document verification, interviews with related parties as well as field visits to plantations and mills show that up to the implementation of the Audit, Bukit Maradja POM only processed FFB originating from the nucleus estate which consists of Bukit Maradja Estate, Kerasaan Estate and Timbang Deli Estate.	Not Applicable
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe.	<p><b>Bukit Maradja Estate:</b></p> <p>Contract for FFB transport: "Surat Perjanjian Kerja No.01/RMO-BME/MPN/I/2021 antara PT. Eastern Sumatra Indonesia dengan PT. Multi Prima Nusa tentang Angkut FFB" signed on 4 January 2021. The contract stipulates payment schedule on Section 2: invoice shall be submitted max.7 days from minutes of handover. Timeframe agreed on Section 4: start 3 January 2021 – 31 December 2021.</p> <p><b>Bukit Maradja POM</b></p>	Complied

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		<p>Contract boiler repair: "Surat Perjanjian Kerja No.03/BMM-HO/ENG/2020 antara PT. Eastern Sumatra Indonesia dengan PT. Atmindo tentang Rekondisi Packing Groove Sterilizer No.1" signed on 25 February 2020. Timeframe agreed on Section 3: start work period 60 days starting 7 days from agreement signed.</p> <p><b>Kerasaan Estate:</b></p> <p>Contract for replanting work: "Surat Perjanjian Kerja No.02/RMO-KRE/AS/VII/2020 antara PT. Kerasaan Indonesia dengan PT. Aneka Sumatrindo tentang Replanting OP 2021" signed on 1 July 2020. Timeframe agreed on Section 4: start work period 150 days.</p> <p><b>Timbang Deli Estate:</b></p> <p>Contract for FFB transport: "Surat Perjanjian Kerja No.TDI/BNCP/I/2021/02 antara PT. Timbang Deli Indonesia dengan CV. Biring Ndu Cahaya Panglong tentang Pengangkutan Tandan Buah Segar" signed on 1 January 2021. The contract, section 5 stipulates timeframe 1 January 2021 – 31 December 2021.</p>	
5.1.6	<p><b>(C)</b> Agreed payments are made in a timely manner and receipts specifying price, weigh, deductions and amount paid are given.</p>	<p><b>Bukit Maradja Estate:</b></p> <p>Contract: "Surat Perjanjian Kerja No.01/RMO-BME/MPN/I/2021 antara PT. Eastern Sumatra Indonesia dengan PT. Multi Prima Nusa tentang Angkut FFB" signed on 4 January 2021. The contract stipulates payment schedule on Section 2: invoice shall be submitted max.7 days from minutes of handover; payment will be done from Head Office Medan. Minutes of work handover for FFB transport of 1,778,890 kg with rate Rp. 31.5/kg, dated 3 February 2021. Invoice PT. Multi Prima Nusa No.01/SPI-BME/MPN/I/2021, dated 3 February 2021 for Rp.61,638,539. Stock receipt and agreed payment made on 21 February 2021.</p> <p>Contract: "Surat Perjanjian Kerja No.02/GMO-BME/AS/I/2021 antara PT. Eastern Sumatra Indonesia dengan PT. Aneka Sumatrindo tentang Sanitasi Ganoderma Persiapan Replanting 2023" signed on 4 January 2021. The contract stipulates payment schedule on Section 3: payment</p>	<p>Not Applicable</p>

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		<p>will be done from Head Office Medan after 100% completion and minutes of work handover. Minutes of work handover No.SPK/02/RMO-BME/AS/II/2021, dated 15 February 2021. Invoice PT. Aneka Sumatrindo No. 2021-0078, dated 15 February 2021 for Rp. 230,132,760. Stock receipt and agreed payment made on 28 February 2021.</p> <p><b>Bukit Maradja POM:</b> Contract: "Surat Perjanjian Kerja No.03/BMM-HO/ENG/2020 antara PT. Eastern Sumatra Indonesia dengan PT. Atmindo tentang Rekondisi Packing Groove Sterilizer No.1" signed on 25 February 2020. Section 6 regulates the payment terms. Company paid the contractor on 28 April 2020.</p> <p><b>Kerasaan Estate:</b> Contract: "Surat Perjanjian Kerja No.02/RMO-KRE/AS/VII/2020 antara PT. Kerasaan Indonesia dengan PT. Aneka Sumatrindo tentang Replanting OP 2021" signed on 1 July 2020. The contract stipulates payment schedule on Section 3: payment will be done from Head Office Medan after 100% completion and minutes of work handover. Minutes of work handover dated 28 October 2020. Invoice PT. Aneka Sumatrindo No. 2020-1465, dated 28 October 2020 for Rp. 1,391,867,437. Stock receipt and agreed payment made on 11 November 2020.</p> <p><b>Timbang Deli Estate:</b> Contract for FFB transport: "Surat Perjanjian Kerja No.TDI/BNCP/I/2021/02 antara PT. Timbang Deli Indonesia dengan CV. Biring Ndu Cahaya Panglong tentang Pengangkutan Tandan Buah Segar" signed on 1 January 2021. Invoice No.021/BNCP/II/2021 for transport of 277,770 kg FFB to Bukit Maradja POM, total Rp. 70,831,350. Evidence In House Transfer to Iwan Simarmata of Rp. 69,414,723. With deduction of tax PPh 23 of Rp.1,416,627.</p>	
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5.1.7	Weighing equipment is verified by an independent third party on a regular basis.	<p><b>Bukit Maradja POM:</b></p> <p>PT. Eastern Sumatra Indonesia demonstrates "Surat Keterangan Hasil Pengujian UPTD Metrologi Legal Pematangsiantar Dinas Koperasi, Usaha Kecil Menengah dan Perdagangan Pemerintah Kota Pematang Siantar No.510.3/989/XI/ML.1-PS" for weighbridge brand: Avery Weigh Tronix; Serial Number 102750224; Capacity 40,000 kg; verified on 26 November 2020. Due for next verification on November 2021.</p>	Complied
5.1.8	The unit of certification supports Independent smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholder on who runs the Internal Controlling System (ICS), who holds the certificate, and who owns and sells certified materials.	<p>PT. Eastern Sumatra Indonesia prepared smallholder partnership program, as documented in "Program Kerja Kemitraan Region North Sumatra Rencana Program Kerja Smallholder Bukit Maradja 2021", December 2020.</p> <ul style="list-style-type: none"> <li>- Smallholder partnership preparation: Selection of partner smallholder January – March 2021; collection document showing legal ownership of land January – March 2021; measurement the area January – March 2021.</li> <li>- Development of cooperative and smallholder member: cooperative committee meeting once per month May – December 2021; training related management and administration May 2021; Training on HCV and RSPO P&amp;C July 2021; Field visit to smallholder plot May, August, October, December 2021.</li> <li>- Preparation for RSPO certification in smallholder cooperative: socialization of certification planning to committee and cooperative member May 2021; ICS structure in cooperative May 2021; document preparation in cooperative May 2021; policy – SOP – smallholder member commitment establishment June 2021; preparation smallholder member oil palm block (condition and ID) July 2021; HCV assessment August 2021; Construction of hazardous waste storage October 2021; Construction of tools and material storage November 2021; Pre audit Internal RSPO December 2021.</li> </ul>	Complied

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		<p>PT. Kerasaan Indonesia prepared smallholder partnership program, as documented in "Program Kerja Smallholder Kerasaan Estate 2020 - 2021".</p> <ul style="list-style-type: none"> <li>- Smallholder partnership preparation: Selection of partner smallholder; collection document showing legal ownership of land; measurement the oil palm block belongs to smallholder – December 2020.</li> <li>- Establishment of cooperative: meeting for cooperative establishment – documentation/administrative requirement for cooperative establishment – notary deed for cooperative establishment – cooperative permit setting – January – February 2021.</li> <li>- Development of cooperative and smallholder member: cooperative committee meeting once per month May – December 2021; training related management and administration May 2021; Training on HCV and RSPO P&amp;C June 2021; Field visit to smallholder plot June, August, October, December 2021.</li> <li>- Preparation for RSPO certification in smallholder cooperative: socialization of certification planning to committee and cooperative member May 2021; ICS structure in cooperative May 2021; document preparation in cooperative May 2021; policy – SOP – smallholder member commitment establishment June 2021; preparation smallholder member oil palm block (condition and ID) July 2021; HCV assessment August 2021; Construction of hazardous waste storage October 2021; Construction of tools and material storage November 2021; Pre audit Internal RSPO December 2021.</li> </ul> <p>PT. Timbang Deli Indonesia prepared smallholder partnership program, as documented in "Smallholder Program PT. Timbang Deli Indonesia" – target 195 Ha.</p> <ul style="list-style-type: none"> <li>- Smallholder partnership preparation: Selection of partner smallholder; collection document showing legal ownership of land; measurement the oil palm block belong to smallholder – March 2021.</li> </ul>	
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		<ul style="list-style-type: none"> <li>- Establishment of cooperative: meeting for cooperative establishment – documentation/administrative requirement for cooperative establishment – notary deed for cooperative establishment – cooperative permit setting – February-March 2021.</li> <li>- Development of cooperative and smallholder member: cooperative committee meeting once per month May – December 2021; training related management and administration May 2021; Training on HCV and RSPO P&amp;C June 2021; Field visit to smallholder plot June, August, October, December 2021.</li> </ul>	
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.	<p>PT. Eastern Sumatra Indonesia established SOP Grievance Procedure No.IAD-01-08/22-01-2020/Rev.0 dated 30 January 2020. The grievance mechanism applicable for internal and external parties.</p> <p><b>Bukit Maradja Estate:</b></p> <p>The Estate manages “Buku Keluh Kesah Internal Eksternal”. In year 2020 consisted of 7 request/reports from workers and external parties. Sample: On 21 December 2020, Pangulu Pematang Sakhuda village, request for collecting grass for cattle feeding from dawn. Responded by Estate Manager on the same date stating company has permitted grass cutting from 06.00 – 18.00, to minimize risk of accident/injury from dangerous animal.</p>	Complied
<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.	<p>Company carried out communication and consultation on “Sosialisasi Tindak Lanjut Petani Kelapa Sawit Calon Mitra Perusahaan di Balai Desa Lingga”, dated 18 February 2020. The company explains the program for smallholder partnership and form a cooperative for oil palm smallholder cooperative. The socialization meeting attended by 25 smallholders.</p> <p>Company carried out communication and consultation on “Sosialisasi Tindak Lanjut Petani Mitra Perusahaan di Kantor Pangulu Mariah</p>	Complied



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		<p>Bandar”, dated 17 February 2020. The company explains the program for smallholder partnership, yield, legality of the land, technical assistance, data collection and form a cooperative for oil palm smallholder cooperative. The socialization meeting attended by 16 potential smallholders.</p> <p>PT. Kerasaan Indonesia made consultation with smallholder Koperasi Pemasaran Maju Sawit Sejahtera, dated 17 February 2021 discuss agenda related to statement letter inconsistent with name stated on lands document; cooperative member agreed to have FFB sales transaction, payment will be transferred to Koperasi Maju Sawit Sejahtera bank account; Cooperative committee will complete all smallholder member documentation related to FFB transaction. The meeting was attended by 7 smallholder cooperative committee and Muhammad Abdin – Smallholder Service.</p> <p>PT. Timbang Deli Indonesia – Timbang Deli Estate made consultation with potential smallholder in Juhar Baru village, dated 4 December 2020. The meeting discussed agenda related to cooperative establishment, cooperative member agreed to have FFB sales transactionThe meeting was attended by 20 smallholder cooperative committee and Muhammad Abdin – Smallholder Service.</p>	
5.2.2	<p>The unit of certification develops and implements livelihood improvement programmes, including at least capacity building to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder).</p>	<p>PT. Eastern Sumatra Indonesia prepared smallholder partnership program, as documented in “Program Kerja Kemitraan Region North Sumatra Rencana Program Kerja Smallholder Bukit Maradja 2021”, December 2020.</p> <ul style="list-style-type: none"> <li>- Smallholder partnership preparation: Selection of partner smallholder January – March 2021; collection document showing legal ownership of land January – March 2021; measurement the area January – March 2021.</li> <li>- Establishment of cooperative: meeting for cooperative establishment – documentation/administrative requirement for cooperative</li> </ul>	Complied

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		<p>establishment – notary deed for cooperative establishment – cooperative permit setting December 2020.</p> <ul style="list-style-type: none"> <li>- Partnership Memorandum of Understanding/MoU signing between cooperative and company: socialization of smallholder partnership MoU June 2021; MoU signing between cooperative and company witnessed by village head, regent, and plantation service June 2021; handover document to company June 2021.</li> <li>- Preparation of partnership FFB sales to third party POM: Survey FFB price from POM around company March 2021; Cost survey for purchase and sales operation to third company March 2021; Estimate crop of partner cooperative March 2021; cooperative location survey and FFB quality May 2021; Determination and contract to third party POM May 2021;</li> <li>- Preparation for FFB receiving from member of smallholder partnership: cooperative partnership account setting May 2021; partner cooperative opens bank account for its smallholder member May 2021; socialization FFB receiving and payment for smallholder member May 2021; receiving FFB from partner cooperative May 2021.</li> <li>- Development of cooperative and smallholder member: cooperative committee meeting once per month May – December 2021; training related management and administration May 2021; cooperative member meeting; Training related to harvest May 2021; Training related to fertilizer application May 2021; Training related to pest and disease and use of pesticide May 2021; Training on health and safety July 2021; Training on HCV and RSPO P&amp;C July 2021; Field visit to smallholder plot May, August, October, December 2021.</li> <li>- Tools provision to smallholder member: PPE provision, spraying tools June 2021; Smallholder plot road maintenance October 2021.</li> <li>- Preparation for RSPO certification in smallholder cooperative: socialization of certification planning to committee and cooperative</li> </ul>	
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		<p>member May 2021; ICS structure in cooperative May 2021; document preparation in cooperative May 2021; policy – SOP – smallholder member commitment establishment June 2021; preparation smallholder member oil palm block (condition and ID) July 2021; HCV assessment August 2021; Construction of hazardous waste storage October 2021; Construction of tools and material storage November 2021; Pre audit Internal RSPO December 2021.</p> <p>PT. Kerasaan Indonesia prepared smallholder partnership program, as documented in "Program Kerja Smallholder Kerasaan Estate 2020 - 2021".</p> <ul style="list-style-type: none"> <li>- Smallholder partnership preparation: Selection of partner smallholder; collection document showing legal ownership of land; measurement the oil palm block belongs to smallholder – December 2020.</li> <li>- Establishment of cooperative: meeting for cooperative establishment – documentation/administrative requirement for cooperative establishment – notary deed for cooperative establishment – cooperative permit setting – January – February 2021.</li> <li>- Partnership Memorandum of Understanding/MoU signing between cooperative and company: socialization of smallholder partnership MoU; MoU signing between cooperative and company witnessed by village head, regent, and plantation service; handover document to company - April 2021.</li> <li>- Preparation of partnership FFB sales to third party POM: Survey FFB price from POM around company; Cost survey for purchase and sales operation to third party company; Estimate crop of partner cooperative; cooperative location survey and FFB quality; Determination and contract to third party POM – April 2021;</li> <li>- Preparation for FFB receiving from member of smallholder partnership: cooperative partnership account setting; partner cooperative opens bank account for its smallholder member; socialization FFB receiving</li> </ul>	
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		<p>and payment for smallholder member; receiving FFB from partner cooperative – March 2021.</p> <ul style="list-style-type: none"> <li>- Development of cooperative and smallholder member: cooperative committee meeting once per month May – December 2021; training related management and administration May 2021; cooperative member meeting; Training related to harvest June 2021; Training related to fertilizer application June 2021; Training related to pest and disease and use of pesticide June 2021; Training on health and safety June 2021; Training on HCV and RSPO P&amp;C June 2021; Field visit to smallholder plot June, August, October, December 2021.</li> <li>- Tools provision to smallholder member: PPE provision, spraying tools June 2021; Smallholder plot road maintenance June - October 2021.</li> <li>- Preparation for RSPO certification in smallholder cooperative: socialization of certification planning to committee and cooperative member May 2021; ICS structure in cooperative May 2021; document preparation in cooperative May 2021; policy – SOP – smallholder member commitment establishment June 2021; preparation smallholder member oil palm block (condition and ID) July 2021; HCV assessment August 2021; Construction of hazardous waste storage October 2021; Construction of tools and material storage November 2021; Pre audit Internal RSPO December 2021.</li> </ul> <p>PT. Timbang Deli Indonesia prepared smallholder partnership program, as documented in “Smallholder Program PT. Timbang Deli Indonesia” – target 195 Ha.</p> <ul style="list-style-type: none"> <li>- Smallholder partnership preparation: Selection of partner smallholder; collection document showing legal ownership of land; measurement the oil palm block belong to smallholder – March 2021.</li> <li>- Establishment of cooperative: meeting for cooperative establishment – documentation/administrative requirement for cooperative</li> </ul>	
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		<p>establishment – notary deed for cooperative establishment – cooperative permit setting – February-March 2021.</p> <ul style="list-style-type: none"> <li>- Partnership Memorandum of Understanding/MoU signing between cooperative and company: socialization of smallholder partnership MoU; MoU signing between cooperative and company witnessed by village head, regent, and plantation service; handover document to company - April 2021.</li> <li>- Preparation of partnership FFB sales to third party POM: Survey FFB price from POM around company – April 2021;</li> <li>- Preparation for FFB receiving from member of smallholder partnership: cooperative partnership account setting; partner cooperative opens bank account for its smallholder member – April 2021.</li> <li>- Preparation for RSPO certification in smallholder cooperative: overlay map against forest area, river buffer area, etc. – March 2021</li> </ul>	
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	<p>PT. Eastern Sumatra Indonesia prepared support program to smallholders to promote legality of FFB production in form "Rekapitulasi Data Pengukuran Smallholder PT. Eastern Sumatra Indonesia Tahun 2020-2021", the company assist</p> <ul style="list-style-type: none"> <li>- Koperasi Mitra Sejahtera Mandiri, Maligas Bayu village, as of December 2020 registered land letter for 52.45 Ha, not yet equipped with lands document 18.95 Ha, Area not yet measured 1.5 Ha. Total 72.92 Ha.</li> <li>- Koperasi Mancuk Mandiri Jaya, Mancuk and Marihat Butar village, as of December 2020 registered lands document 86.57 Ha, not yet equipped with lands document 63.16 Ha, Area not yet measured 19.63 Ha. Total 169.30 Ha.</li> <li>- Koperasi Sari Mutiara Indah, Silau Malela, Pematang Gajing, Gajing Jaya village, as of December 2020 registered lands document for 194.59 Ha, not yet equipped with lands document 46.53 Ha, Area not yet measured 39.65 Ha. Total 280.78 Ha.</li> </ul>	Complied

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		<ul style="list-style-type: none"> <li>- Koperasi Parmonangan Sejahtera Mandiri, Dolok Parmonangan, Naga Sofa, Tanjung Hataran village, as of December 2020 registered lands document for 46.75 Ha, not yet equipped with lands document 49.53 Ha, Area not yet measured 7.82 Ha, potential 50 Ha. Total 154.09 Ha.</li> <li>PT. Kerasaan Indonesia prepared support program to smallholders to promote legality of FFB production in form "Rekapitulasi Data Pengukuran Smallholder PT. Kerasaan Indonesia Tahun 2020-2021", the company checked the smallholder block's legal ownership of the land:</li> <li>- Mr. Agus, the oil palm block completed with "Surat Keterangan Tanah No.594/95/2012/SKT-TR/XII/PEM 2020 Pangulu Talun Rejo" for 13.12 Ha dated 23 December 2020.</li> <li>- Mr. Ngatino, the oil palm block equipped with "Sertifikat Hak Milik No.24 No.02.09.09.12.1.00024 dated 9 November 1999.</li> <li>PT. Timbang Deli Indonesia prepared support program to smallholders to promote legality of FFB production in form "Daftar Pemilik Lahan untuk Rencana Plasma TDE", the company assist</li> <li>- Koperasi Pemasaran Tani Jaya Bersatu, as of 2 March 2021 registered land letter and measured for 102.92 Ha, equipped with map.</li> <li>- Sampled verification: 16 March 2021 measure and collect photocopy of lands, ID card, from cooperative member of 2.2 Ha.</li> </ul>	
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	<p>The supply base for PT. Eastern Sumatra Indonesia – Bukit Maradja POM does not include scheme smallholders. However, the company and its supply base prepare program to assist smallholder.</p> <p>PT. Eastern Sumatra Indonesia prepared smallholder partnership program, as documented in "Program Kerja Kemitraan Region North Sumatra Rencana Program Kerja Smallholder Bukit Maradja 2021", December 2020.</p> <ul style="list-style-type: none"> <li>- Development of cooperative and smallholder member: Training related to pest and disease and use of pesticide May 2021;</li> </ul>	Complied

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		<p>PT. Kerasaan Indonesia prepared smallholder partnership program, as documented in "Program Kerja Smallholder Kerasaan Estate 2020 - 2021".</p> <ul style="list-style-type: none"> <li>- Development of cooperative and smallholder member: Training related to pest and disease and use of pesticide June 2021</li> </ul> <p>PT. Timbang Deli Indonesia prepared smallholder partnership program, as documented in "Program Kerja Smallholder PT. Timbang Deli Indonesia 2021".</p> <ul style="list-style-type: none"> <li>- Development of cooperative and smallholder member: Training related to pest and disease and use of pesticide May, July, September, November 2021.</li> </ul>	
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	<p>Management Review Report (corporate level), dated 4 March 2021.</p> <ul style="list-style-type: none"> <li>- Feedback from Interested parties: The major impact on relationships, communications, and engagement within the business and with all of our external stakeholders for 2020 was the evolving COVID-19 pandemic across the world; Statutory reporting all met in 2020; HGU renewal: impending for North Sumatera Estates; Plasma requirements: new and renewal HGU applications must be supported by a 20% plasma component.</li> <li>- Performance of External Supplier: Smallholder Department, External Suppliers.</li> </ul>	Complied
<p><b>Principle 6: respect workers' rights and conditions</b>          Protect workers' rights and ensure safe and decent working conditions.</p>			
<p><b>Criteria 6.1: Any form of discrimination is prohibited.</b></p>			
6.1.1	<b>(C)</b> A publicly available non-discrimination and equal opportunity policy is implemented in such way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.	<p>PT. Eastern Sumatra Indonesia established Equal Employment Opportunity Policy No.QMM-40-01-P03/27-03-2019 signed by President Director on 27 March 2019. The policy stated company is committed to a non-discriminatory workplace and will abide by the relevant anti-</p>	Complied

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		<p>discrimination and equal employment legislation of the Republic of Indonesia. Company is not discriminating against anyone in the recruitment process of the company business operations. The company recruitment selection process is based on merit so all applicants with the desired qualifications and experience will be considered for the open position. The successful applicant will be the person who best meets the specific requirements of the job. Promotions within the company are handled on the same basis.</p> <p><b>Bukit Maradja POM:</b>          Socialization of this non-discrimination policy and equal opportunity policy in Bukit Maradja POM carried out on 27 January 2020; attended by 8 workers from mill's office; 26 workers from Processing Shift A; 25 workers from workshop; 9 workers from gardeners, water treatment plant, dayworkers. Socialization of this policy in Bukit Maradja POM carried out on 17 January 2020; attended by 26 workers from Processing Shift B.</p> <p><b>Bukit Maradja Estate:</b>          This policy communicated to contractors. For example, sighted the record of non-discrimination policy and equal opportunity policy socialization on 23 February 2021. The socialization attended by 10 drivers and helper from PT. Multi Prima Nusa (FFB transporter).</p> <p><b>Kerasaan Estate</b>          Non-discrimination policy and equal opportunity policy socialization in Kerasaan Estate carried out:          - 71 workers from Division I Kerasaan Estate dated 3 February 2021;          - 69 workers and 15 PKWT/contract workers from Division III Kerasaan Estate, dated 4 January 2021.</p>	
6.1.2	<b>(C)</b> Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated	Bukit Maradja POM shows list of employees in the organization, whereby shows company hires people from different religion (Islam 76	Complied



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	<p>against. Evidence includes migrant workers non-payment of recruitment fees.</p>	<p>employees, Christian 24 employees); origin (local 63 employees, outside area 37 employees); gender (3 female workers, 97 male workers); ages (between 19 years to 50 years).</p> <p>Bukit Maradja POM carried out recruitment. Application and recruitment document sighted: application letter, education certificate, copy of ID card, health certificate, etc. Based on interview with one of new recruited employees, the recruitment process was not involving recruitment fees.</p> <p>Timbang Deli Estate shows list of employees in the organization, whereby shows company hires people from different religion (Islam 40 employees, Christian 1 employees); origin (local 41 employees); gender (7 female workers, 34 male workers); ages (between 28 years to 49 years).</p> <p>Timbang Deli Estate carried out recruitment dated 1 February 2021. The recruitment for kindergarten teacher position. Application and recruitment document sighted: application letter, education certificate, copy of ID card, health certificate, etc. Based on interview with one of new recruited employees, the recruitment process was not involving recruitment fees.</p>	
<p>6.1.3</p>	<p>The unit of certification demonstrates that the recruitment selection, hiring access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p>	<p><b>Bukit Maradja Estate:</b></p> <p>Letter for appointment based on Memorandum HR Department No.226/JWB-RMONS/IX/2020 dated 30 September 2020. Approved appointment for 3 employees: Rizki Alwanda (carpenter) from PKWT to SKU, Rapi Danu (carpenter) from PKWT to SKU, Ilah Kurnia Jannah (STC cooker) from PKWT to SKU. The appointment status indicates all tribe, all sex eligible for promotion.</p> <p>Letter for promotion based on Memorandum HR Department No.170/JWB-RMONS/VII/2020 dated 29 July 2020. Approved promotion for 28 employees; sample: Anda Adi Utama (Payroll clerk) from P3 to P5, Armanto (54 years, harvest supervision) from Q1 to Q2P, Octavianus</p>	<p>Complied</p>

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		<p>Karo-karo (Tractor Driver) from P2 to P3. The promotion status indicates all tribe, all sex, all ages are eligible for promotion.</p> <p>PT. Eastern Sumatra Indonesia paid pension for employee under name Wiwik Anjani and Santuso, dated 22 December 2020.</p>	
6.1.4	<p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p>	<p>Based on interview with recruited female worker in Kerasaan Estate and Timbang Deli Estate, the selection and recruitment does not involve pregnancy testing.</p>	Complied
6.1.5	<p><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.</p>	<p>PT. Eastern Sumatra Indonesia established SOP Gender Committee No.HRD-04-12/24-10-2019, signed on 19 March 2020. The SOP stated Gender Committee task is to give recommendation to BOD on decision making related to gender issue in the company; reviewing and evaluating management of gender issues in company; conduct meeting at least once per year; provides training on understanding of rights of female workers.</p> <p><b>Bukit Maradja POM:</b></p> <p>Bukit Maradja POM has established Gender Committee Contact Group, dated 5 March 2020. Chairman Ricardo Sihombing (Mill Manager); Secretary Dicky Pratama (Office Assisstant); Member: Sutranto, Elsa Sarisa Manik, Ade Rani Agustina. Sampled meeting and review on 13 February 2020 – agenda discussion gender matter during January 2020, no issue.</p> <p><b>Bukit Maradja Estate:</b></p> <p>Bukit Maradja Estate has established gender committee Contact Group, dated 5 February 2021. Chairman Risal (Estate Manager); Secretary:Iqbal Syahputra (Office Head Assisstant); Member: Agus Kurniawan, Sumiati, Cecilia Natalenta Depari.</p> <p><b>Kerasaan Estate:</b></p> <p>Kerasaan Estate has established gender committee Contact Group, dated 13 March 2021. Chairman Burlen J Sihombing (Estate Manager);</p>	Complied

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		<p>Secretary Sony Prianggara (Office Head Assisstant); Member: Birmansyah Harahap, Siska, Sylvia Bianca Sihombing.</p> <p><b>Timbang Deli Estate:</b></p> <p>Timbang Deli Estate has established gender committee Contact Group. The gender committee prepared a program, dated 12 March 2021 consist of socialization planned for February 2021; gender committee meeting planned for January, April, July, October 2021; Capacity building for female workers planned for March 2021; Environment cleaning planned for May 2021.</p>	
6.1.6	There is evidence of equal pay for the same work scope.	<p><b>Bukit Maradja Estate:</b></p> <p>Sumiati (spraying/SKU H/female) for period 1 November 2020 – 30 November 2020 received salary of Rp. 2,963,000.</p> <p>Wagimin (EFB scatter/SKU H/male worker) for period 1 November 2020 – 30 November 2020 received salary of Rp. 2,963,000.</p> <p><b>Kerasaan Estate:</b></p> <p>Supriati (spraying/SKU H/female) for period 1 February 2021 – 28 February 2021 received salary of Rp. 2,963,000.</p> <p>Supriadi (fertilizer applicator/SKU H/male worker) for period 1 February 2021 – 28 February 2021 received salary of Rp. 2,963,000.</p>	Complied
<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> Documentation of pay and working conditions in accordance with applicable labour laws are available to the workers in national languages and explained to them in language they understand.	<p>PT. Eastern Sumatra Indonesia have documented the pay and working condition in accordance to labour law (Undang-undang No.13 tahun 2003 tentang Ketenagakerjaan), as established under "Perjanjian Kerja Bersama (PKB) PT. Eastern Sumatra Indonesia dengan Pengurus Serikat Pekerja Bukit Maradja Mandiri (SPBMM) periode 2018-2020". The document has been legalized through "Keputusan Kepala Dinas Tenaga Kerja Kabupaten Simalungun No.188.44/1564/23.4/2018 tentang</p>	Complied

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		<p>Pendaftaran Perjanjian Kerja Bersama (PKB) antara PT. Eastern Sumatra Indonesia dengan Pengurus Serikat Pekerja Bukit Maradja Mandiri" dated 5 December 2018. This document available in Bahasa Indonesia.</p> <ul style="list-style-type: none"> <li>- Regular working hours of 7 hours per day regulated under Chapter IV;</li> <li>- Salary regulated under Chapter V;</li> <li>- Deductions regulated under Chapter IV and VIII;</li> <li>- Overtime regulated under Chapter X, referring to "Keputusan Menteri Tenaga Kerja dan Transmigrasi RI No.102/MEN/VI/2004 tentang Waktu Kerja dan Upah Kerja Lembur";</li> <li>- Sick leave regulated under Chapter VII;</li> <li>- Annual leave entitlement regulated under Chapter VII;</li> <li>- Maternity leave regulated under Chapter VII;</li> <li>- Reasons for dismissal regulated under Chapter XXI;</li> <li>- Period of notice regulated under Chapter XXI;</li> <li>- Pension regulated under Chapter XVI;</li> <li>- Resolution upon industrial dispute on Chapter XXIII;</li> </ul> <p>Collective Bargaining Agreement/Perjanjian Kerja Bersama (PKB) period 2018-2020 was expired on November 2020. Worker union and management agreed to extending the use of said agreement until 2 November 2021. This consensus to extending the use of 2018-2020 agreement was explained under "Notulen Rapat Perpanjangan Perjanjian Kerja Bersama (PKB) PT. Eastern Sumatra Indonesia" dated 13 August 2020. The minutes then reported by PT. Eastern Sumatra Indonesia to Manpower Service Simalungun Regency; dated 19 August 2020; acknowledged by authority.</p> <p>PT. Kerasaan Indonesia have documented the pay and working condition in accordance to labour law (Undang-undang No.13 tahun 2003 tentang Ketenagakerjaan), as established under "Perjanjian Kerja</p>	
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		<p>Bersama (PKB) PT. Kerasaan Indonesia dengan Pengurus Serikat Pekerja Kerasaan Indonesia Mandiri (SPKIM) periode 2018-2020". The document has been legalized through "Keputusan Kepala Dinas Tenaga Kerja Kabupaten Simalungun No.188.44/1563/23.4/2018 tentang Pendaftaran Perjanjian Kerja Bersama (PKB) antara PT. Kerasaan Indonesia dengan Pengurus Serikat Pekerja Kerasaan Indonesia Mandiri" dated 5 December 2018. This document available in Bahasa Indonesia.</p> <ul style="list-style-type: none"> <li>- Regular working hours of 7 hours per day regulated under Chapter IV;</li> <li>- Salary regulated under Chapter V;</li> <li>- Deductions regulated under Chapter IV and VIII;</li> <li>- Overtime regulated under Chapter X, referring to "Keputusan Menteri Tenaga Kerja dan Transmigrasi RI No.102/MEN/VI/2004 tentang Waktu Kerja dan Upah Kerja Lembur";</li> <li>- Sick leave regulated under Chapter VII;</li> <li>- Annual leave entitlement regulated under Chapter VII;</li> <li>- Maternity leave regulated under Chapter VII;</li> <li>- Reasons for dismissal regulated under Chapter XXI;</li> <li>- Period of notice regulated under Chapter XXI;</li> <li>- Pension regulated under Chapter XVI;</li> <li>- Resolution upon industrial dispute on Chapter XXIII;</li> </ul> <p>Collective Bargaining Agreement/Perjanjian Kerja Bersama (PKB) period 2018-2020 was expired on November 2020. Worker union and management agreed to extending the use of said agreement until end of November 2021. This consensus to extending the use of 2018-2020 agreement was explained under "Memorandum No.146/KRE/RMO-NS/VIII/2020 Berita Acara Rapat Bipartit Perpanjangan Perjanjian Kerja Bersama (PKB)" dated 14 August 2020. The meeting was attended by</p>	
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		<p>Estate Manager, Office Assistant, Public Relation, Chairman, Public Relation of Worker Union, Treasury Worker Union.</p> <p>PT. Timbang Deli Indonesia have documented the pay and working condition in accordance to labour law (Undang-undang No.13 tahun 2003 tentang Ketenagakerjaan), as established under "Perjanjian Kerja Bersama (PKB) PT. Kerasaan Indonesia dengan Pengurus Serikat Pekerja Timbang Deli Indonesia Mandiri (SPTDM) periode 2018-2020". The document has been legalized through "Keputusan Kepala Dinas Tenaga Kerja Kabupaten Deli Serdang No.560/08/DK-5FM/DS/2020 tentang Pendaftaran Perjanjian Kerja Bersama (PKB)" dated 3 November 2020. This document available in Bahasa Indonesia.</p> <ul style="list-style-type: none"> <li>- Regular working hours of 7 hours per day regulated under Chapter IV;</li> <li>- Salary regulated under Chapter V;</li> <li>- Deductions regulated under Chapter IV and VIII;</li> <li>- Overtime regulated under Chapter X, referring to "Keputusan Menteri Tenaga Kerja dan Transmigrasi RI No.102/MEN/VI/2004 tentang Waktu Kerja dan Upah Kerja Lembur";</li> <li>- Sick leave regulated under Chapter VII;</li> <li>- Annual leave entitlement regulated under Chapter VII;</li> <li>- Maternity leave regulated under Chapter VII;</li> <li>- Reasons for dismissal regulated under Chapter XXI;</li> <li>- Period of notice regulated under Chapter XXI;</li> <li>- Pension regulated under Chapter XVI;</li> <li>- Resolution upon industrial dispute on Chapter XXIII;</li> </ul> <p>Collective Bargaining Agreement/Perjanjian Kerja Bersama (PKB) period 2018-2020 was expired on November 2020. Worker union and management agreed to extending the use of said agreement until end of November 2021. This consensus to extending the use of 2018-2020</p>	
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		<p>agreement was explained under "Berita Acara Kesepakatan Perpanjangan Perjanjian Kerja Bersama antara PT. Timbang Deli Indonesia dengan Serikat Pekerja Timbang Deli Mandiri" dated 23 October 2020. The meeting was attended by Estate Manager, Office Assistant, Public Relation, Chairman, Public Relation of Worker Union, Treasury Worker Union.</p>	
<p>6.2.2</p>	<p><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.</p>	<p>PT. Eastern Sumatra Indonesia have documented the pay and working condition in accordance to labour law (Undang-undang No.13 tahun 2003 tentang Ketenagakerjaan), as established under "Perjanjian Kerja Bersama (PKB) PT. Eastern Sumatra Indonesia dengan Pengurus Serikat Pekerja Bukit Maradja Mandiri (SPBMM) periode 2018-2020". The document has been legalized through "Keputusan Kepala Dinas Tenaga Kerja Kabupaten Simalungun No.188.44/1564/23.4/2018 tentang Pendaftaran Perjanjian Kerja Bersama (PKB) antara PT. Eastern Sumatra Indonesia dengan Pengurus Serikat Pekerja Bukit Maradja Mandiri" dated 5 December 2018. This document available in Bahasa Indonesia.</p> <ul style="list-style-type: none"> <li>- Regular working hours of 7 hours per day regulated under Chapter IV;</li> <li>- Salary regulated under Chapter V;</li> <li>- Deductions regulated under Chapter IV and VIII;</li> <li>- Overtime regulated under Chapter X, referring to "Keputusan Menteri Tenaga Kerja dan Transmigrasi RI No.102/MEN/VI/2004 tentang Waktu Kerja dan Upah Kerja Lembur";</li> <li>- Sick leave regulated under Chapter VII;</li> <li>- Annual leave entitlement regulated under Chapter VII;</li> <li>- Maternity leave regulated under Chapter VII;</li> <li>- Reasons for dismissal regulated under Chapter XXI;</li> <li>- Period of notice regulated under Chapter XXI;</li> <li>- Pension regulated under Chapter XVI;</li> </ul>	<p>Complied</p>

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		<ul style="list-style-type: none"> <li>- Resolution upon industrial dispute on Chapter XXIII;</li> <li>Sample of compliance to Collective Agreement (PKB) in Bukit Maradja Estate are:</li> <li>Workers ID: 04991. Basic salary: IDR 2,720,000; Overtime: IDR 1,xxx,xxx; Rice Allowance: IDR xxx,xxx; Total wage in January 2021: IDR 4,xxx,xxx.</li> <li>Workers ID: 03129. Basic salary: IDR 2,720,000; Overtime: IDR 1xx,xxx; Rice Allowance: IDR xxx,xxx; Total wage in January 2021: IDR 3,xxx,xxx.</li> <li>PT. Kerasaan Indonesia have documented the pay and working condition in accordance to labour law (Undang-undang No.13 tahun 2003 tentang Ketenagakerjaan), as established under "Perjanjian Kerja Bersama (PKB) PT. Kerasaan Indonesia dengan Pengurus Serikat Pekerja Kerasaan Indonesia Mandiri (SPKIM) periode 2018-2020". The document has been legalized through "Keputusan Kepala Dinas Tenaga Kerja Kabupaten Simalungun No.188.44/1563/23.4/2018 tentang Pendaftaran Perjanjian Kerja Bersama (PKB) antara PT. Kerasaan Indonesia dengan Pengurus Serikat Pekerja Kerasaan Indonesia Mandiri" dated 5 December 2018. This document available in Bahasa Indonesia.</li> <li>- Regular working hours of 7 hours per day regulated under Chapter IV;</li> <li>- Salary regulated under Chapter V;</li> <li>- Deductions regulated under Chapter IV and VIII;</li> <li>- Overtime regulated under Chapter X, referring to "Keputusan Menteri Tenaga Kerja dan Transmigrasi RI No.102/MEN/VI/2004 tentang Waktu Kerja dan Upah Kerja Lembur";</li> <li>- Sick leave regulated under Chapter VII;</li> <li>- Annual leave entitlement regulated under Chapter VII;</li> <li>- Maternity leave regulated under Chapter VII;</li> </ul>	
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		<ul style="list-style-type: none"> <li>- Reasons for dismissal regulated under Chapter XXI;</li> <li>- Period of notice regulated under Chapter XXI;</li> <li>- Pension regulated under Chapter XVI;</li> <li>- Resolution upon industrial dispute on Chapter XXIII;</li> </ul> <p>PT. Timbang Deli Indonesia have documented the pay and working condition in accordance to labour law (Undang-undang No.13 tahun 2003 tentang Ketenagakerjaan), as established under "Perjanjian Kerja Bersama (PKB) PT. Kerasaan Indonesia dengan Pengurus Serikat Pekerja Timbang Deli Indonesia Mandiri (SPTDM) periode 2018-2020". The document has been legalized through "Keputusan Kepala Dinas Tenaga Kerja Kabupaten Deli Serdang No.560/08/DK-5FM/DS/2020 tentang Pendaftaran Perjanjian Kerja Bersama (PKB)" dated 3 November 2020. This document available in Bahasa Indonesia.</p> <ul style="list-style-type: none"> <li>- Regular working hours of 7 hours per day regulated under Chapter IV;</li> <li>- Salary regulated under Chapter V;</li> <li>- Deductions regulated under Chapter IV and VIII;</li> <li>- Overtime regulated under Chapter X, referring to "Keputusan Menteri Tenaga Kerja dan Transmigrasi RI No.102/MEN/VI/2004 tentang Waktu Kerja dan Upah Kerja Lembur";</li> <li>- Sick leave regulated under Chapter VII;</li> <li>- Annual leave entitlement regulated under Chapter VII;</li> <li>- Maternity leave regulated under Chapter VII;</li> <li>- Reasons for dismissal regulated under Chapter XXI;</li> <li>- Period of notice regulated under Chapter XXI;</li> <li>- Pension regulated under Chapter XVI;</li> <li>- Resolution upon industrial dispute on Chapter XXIII;</li> </ul> <p>Collective Bargaining Agreement/Perjanjian Kerja Bersama (PKB) period 2018-2020 was expired on November 2020. Worker union and</p>	
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		<p>management agreed to extending the use of said agreement until end of November 2021. This consensus to extending the use of 2018-2020 agreement was explained under "Berita Acara Kesepakatan Perpanjangan Perjanjian Kerja Bersama antara PT. Timbang Deli Indonesia dengan Serikat Pekerja Timbang Deli Mandiri" dated 23 October 2020. The meeting was attended by Estate Manager, Office Assistant, Public Relation, Chairman, Public Relation of Worker Union, Treasury Worker Union.</p>	
<p>6.2.3</p>	<p><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.</p>	<p>PT. Eastern Sumatra Indonesia have documented the pay and working condition in accordance to labour law (Undang-undang No.13 tahun 2003 tentang Ketenagakerjaan), as established under "Perjanjian Kerja Bersama (PKB) PT. Eastern Sumatra Indonesia dengan Pengurus Serikat Pekerja Bukit Maradja Mandiri (SPBMM) periode 2018-2020". The document has been legalized through "Keputusan Kepala Dinas Tenaga Kerja Kabupaten Simalungun No.188.44/1564/23.4/2018 tentang Pendaftaran Perjanjian Kerja Bersama (PKB) antara PT. Eastern Sumatra Indonesia dengan Pengurus Serikat Pekerja Bukit Maradja Mandiri" dated 5 December 2018. This document available in Bahasa Indonesia.</p> <ul style="list-style-type: none"> <li>- Regular working hours of 7 hours per day regulated under Chapter IV;</li> <li>- Salary regulated under Chapter V;</li> <li>- Deductions regulated under Chapter IV and VIII;</li> <li>- Overtime regulated under Chapter X, referring to "Keputusan Menteri Tenaga Kerja dan Transmigrasi RI No.102/MEN/VI/2004 tentang Waktu Kerja dan Upah Kerja Lembur";</li> <li>- Sick leave regulated under Chapter VII;</li> <li>- Annual leave entitlement regulated under Chapter VII;</li> <li>- Maternity leave regulated under Chapter VII;</li> <li>- Reasons for dismissal regulated under Chapter XXI;</li> <li>- Period of notice regulated under Chapter XXI;</li> </ul>	<p>Complied</p>

		<ul style="list-style-type: none"> <li>- Pension regulated under Chapter XVI;</li> <li>- Resolution upon industrial dispute on Chapter XXIII;</li> </ul> <p>Sample of compliance to Collective Agreement (PKB) in Bukit Maradja Estate are:</p> <p>Workers ID: 04991. Basic salary: IDR 2,720,000; Overtime: IDR 1,xxx,xxx; Rice Allowance: IDR xxx,xxx; Total wage in January 2021: IDR 4,xxx,xxx.</p> <p>Workers ID: 03129. Basic salary: IDR 2,720,000; Overtime: IDR 1xx,xxx; Rice Allowance: IDR xxx,xxx; Total wage in January 2021: IDR 3,xxx,xxx.</p> <p>PT. Kerasaan Indonesia have documented the pay and working condition in accordance to labour law (Undang-undang No.13 tahun 2003 tentang Ketenagakerjaan), as established under "Perjanjian Kerja Bersama (PKB) PT. Kerasaan Indonesia dengan Pengurus Serikat Pekerja Kerasaan Indonesia Mandiri (SPKIM) periode 2018-2020". The document has been legalized through "Keputusan Kepala Dinas Tenaga Kerja Kabupaten Simalungun No.188.44/1563/23.4/2018 tentang Pendaftaran Perjanjian Kerja Bersama (PKB) antara PT. Kerasaan Indonesia dengan Pengurus Serikat Pekerja Kerasaan Indonesia Mandiri" dated 5 December 2018. This document available in Bahasa Indonesia.</p> <ul style="list-style-type: none"> <li>- Regular working hours of 7 hours per day regulated under Chapter IV;</li> <li>- Salary regulated under Chapter V;</li> <li>- Deductions regulated under Chapter IV and VIII;</li> <li>- Overtime regulated under Chapter X, referring to "Keputusan Menteri Tenaga Kerja dan Transmigrasi RI No.102/MEN/VI/2004 tentang Waktu Kerja dan Upah Kerja Lembur";</li> <li>- Sick leave regulated under Chapter VII;</li> <li>- Annual leave entitlement regulated under Chapter VII;</li> </ul>	
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<p>6.2.4</p>	<p><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 facilities are available or accessible. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.</p>	<p><b>Bukit Maradja Estate:</b></p> <table border="1"> <thead> <tr> <th>Facility</th> <th>Unit</th> <th>Facility</th> <th>Unit</th> </tr> </thead> <tbody> <tr> <td>Masjid</td> <td>4</td> <td>Volley ball court</td> <td>4</td> </tr> <tr> <td>Kindergarten</td> <td>2</td> <td>Football field</td> <td>1</td> </tr> <tr> <td>Islamic school</td> <td>3</td> <td>Badminton court</td> <td>2</td> </tr> <tr> <td>Employee Hall</td> <td>3</td> <td>School bus</td> <td>1</td> </tr> <tr> <td>Clinic</td> <td>1</td> <td>Fertilizer store</td> <td>1</td> </tr> <tr> <td>Employee house</td> <td>83</td> <td>Chemical store</td> <td>1</td> </tr> <tr> <td>Staff house</td> <td>8</td> <td></td> <td></td> </tr> </tbody> </table> <p><b>Kerasaan Estate:</b></p> <table border="1"> <thead> <tr> <th>Facility</th> <th>Unit</th> <th>Facility</th> <th>Unit</th> </tr> </thead> <tbody> <tr> <td>Masjid</td> <td>1</td> <td>Volley ball court</td> <td>1</td> </tr> <tr> <td>Kindergarten</td> <td>1</td> <td>Football field</td> <td>1</td> </tr> <tr> <td>Islamic school</td> <td>1</td> <td>Badminton court</td> <td>-</td> </tr> <tr> <td>Employee Hall</td> <td>1</td> <td>School bus</td> <td>1</td> </tr> <tr> <td>Clinic</td> <td>1</td> <td>Fertilizer store</td> <td>1</td> </tr> <tr> <td>Employee house</td> <td>66</td> <td>Chemical store</td> <td>1</td> </tr> </tbody> </table> <p><b>Timbang Deli Estate:</b></p> <table border="1"> <thead> <tr> <th>Facility</th> <th>Unit</th> <th>Facility</th> <th>Unit</th> </tr> </thead> <tbody> <tr> <td>Masjid</td> <td>1</td> <td>Volley ball court</td> <td>1</td> </tr> </tbody> </table>	Facility	Unit	Facility	Unit	Masjid	4	Volley ball court	4	Kindergarten	2	Football field	1	Islamic school	3	Badminton court	2	Employee Hall	3	School bus	1	Clinic	1	Fertilizer store	1	Employee house	83	Chemical store	1	Staff house	8			Facility	Unit	Facility	Unit	Masjid	1	Volley ball court	1	Kindergarten	1	Football field	1	Islamic school	1	Badminton court	-	Employee Hall	1	School bus	1	Clinic	1	Fertilizer store	1	Employee house	66	Chemical store	1	Facility	Unit	Facility	Unit	Masjid	1	Volley ball court	1	<p>Complied</p>
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		Total Dissolved Solid	134 mg/L	1000 mg/L	
		Taste	No taste	No taste	
		Odor	No odor	No odor	
		Total Coliform	<2/100 mL	50 /100 mL	
		<i>E. Coli</i>	<1.8/100 mL	0/100 mL	
		pH	7.04	6.5 – 8.5	
		Ferrit	0.020 mg/L	1 mg/L	
		Fluoride	<0.049 mg/L	1.5 mg/L	
		Hardness (CaCO <sub>3</sub> )	32.0 mg/L	500 mg/L	
		Manganese	<0.0064 mg/L	0.5 mg/L	
		Nitrate, as N	0.25 mg/L	10 mg/L	
		Cyanide	<0.010 mg/L	1 mg/L	
		Detergent	0.006 mg/L	0.05 mg/L	
		Arsenic	<0.00041 mg/L	0.05 mg/L	
		Cadmium	<0.0014 mg/L	0.005 mg/L	
		Chromium	0.0010 mg/L	0.05 mg/L	
		Selenium	<0.005 mg/L	0.01 mg/L	
		Zinc	<0.0024 mg/L	15 mg/L	
		Sulphate	2.73 mg/L	400 mg/L	
		Lead	<0.0016 mg/L	0.05 mg/L	
		Organic Substance (KMnO <sub>4</sub> )	1.87 mg/L	10 mg/L	

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6.2.5	The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.	<p>Field visit to housing area of Bukit Maradja Estate, Kerasaan Estate, Timbang Deli Estate and interview with the housewives in the premise. Audit team found</p> <ul style="list-style-type: none"> <li>- Company works together with employee cooperative in provision of rice, as part of in-kind benefit for worker. Koperasi Serba Usaha Bukit Maradja is distributing rice for all workers.</li> <li>- Company allows food seller to enter the housing compound.</li> <li>- Nearest market selling staple food, vegetables, meat, fish located 10km from the company location.</li> </ul>	Complied
6.2.6	A DLW is paid to all workers in accordance with applicable regulations, including workers who work on a piece rate/quota basis, the calculation of which is based on a quota that can be achieved during regular working hours.	<p>PT. Eastern Sumatra Indonesia has prepared the prevailing wage calculation. The company referred 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 2020). <i>Total Fertility Rate for Indonesia, year 2020 at 2.28 (BPS); Child Mortality Rates for Indonesia, year 2020 at 17.7/1000 births.</i> Reference Family Size at 4.23.</li> <li>- Full time equivalent per Family (incl. Labor Force Participation Rate/LFPR, Unemployment rate, People Working Part Time – Indonesia year 2020). <i>Labour Participation Force Rate for Indonesia, year 2020 at 69.32% (BPS); Unemployment Rate for Indonesia, year 2020 at 4.99% (BPS); People Working Part Time for Indonesia, year 2020 at 23.74% (BPS).</i> Full Time equivalent per family at 1.721.</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 at 0 (provided by company);</li> <li>- Non Food Non Housing cost (electricity, clean water, medical treatment, education, school children transportation cost – provided by company) based on sampling to 10 workers in Bukit Maradja POM,</li> </ul>	Complied

		<p>Bukit Maradja Estate, Kerasaan Estate.</p> <ul style="list-style-type: none"> <li>- Mandatory deduction (from tax and BPJS levy);</li> </ul> <p>Sample of DLW calculation at</p> <p><b>Bukit Maradja Estate, as follow:</b></p> <ul style="list-style-type: none"> <li>- Interviewed 10 workers with different pay grade and dependents (SKU B/K3, SKU B/K2, SKU B/K1. SKU B/K0, SKU H/K3, SKU H/K2, SKU H/K1, SKU H/K0, SKU H/TK, PKWT/TK). Calculated on annual basis 30 December 2020.</li> <li>- Minimum Wage of Simalungun Regency in 2020 is Rp. 2,607,089.49.</li> <li>- Gross Living Wage at Rp 3,236,174;</li> <li>- Prevailing wage at Rp. 4,007,467;</li> <li>- Living Wage Gap at Rp. 771,292 (positive);</li> </ul> <p><b>Kerasaan Estate, as follow:</b></p> <ul style="list-style-type: none"> <li>- Interviewed 10 workers with different pay grade and dependents (SKU B/K3, SKU B/K1, SKU H/K3, SKU H/K2, SKU H/K1, SKU H/TK, PKWT/TK). Calculated on annual basis 30 December 2020.</li> <li>- Minimum Wage of Simalungun Regency in 2020 is Rp. 2,607,089.49.</li> <li>- Gross Living Wage at Rp 3,663,004;</li> <li>- Prevailing wage at Rp. 4,069.957;</li> <li>- Living Wage Gap at Rp. 406,953 (positive);</li> </ul> <p><b>Bukit Maradja POM:</b></p> <ul style="list-style-type: none"> <li>- Interviewed 10 workers with different pay grade and dependents (SKU H/K3, SKU H/K2, SKU H/K1. SKU H/K0, SKU H/TK, SKU B/K2, SKU B/K1, SKU B/K0, PKWT/TK, PKWT/K0). Calculated on annual basis 30 December 2020.</li> <li>- Minimum Wage of Simalungun Regency in 2020 is Rp. 2,607,089.49.</li> <li>- Gross Living Wage at Rp 2,336,547;</li> </ul>	
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		<ul style="list-style-type: none"> <li>- Prevailing wage at Rp. 3,857,235;</li> <li>- Living Wage Gap at Rp. 1,520,688 (positive);</li> </ul> <p><b>Timbang Deli Estate:</b></p> <ul style="list-style-type: none"> <li>- Minimum Wage of Deli Serdang Regency in 2020 is Rp. 3.136.709.</li> <li>- Gross Living Wage at Rp 3,068,069;</li> <li>- Prevailing wage at Rp. 3,797,753;</li> <li>- Living Wage Gap at Rp. 729,684 (positive);</li> </ul>	
6.2.7	<p>Permanent fulltime employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal</p>	<p><b>Bukit Maradja POM:</b></p> <p>Core work in Bukit Maradja POM such as process operators, boiler operators, tractor driver all permanent fulltime (SKU – Syarat Kecakapan Umum). Bukit Maradja POM recruited 4 contract workers as mill gardener, cleaning gang and mechanic. Contract worker for mechanic at the mill in question is for helper that handle the motorbike or cars only, not for production equipment, machineries or production vehicle such as heavy vehicle and FFB truck.</p> <p><b>Bukit Maradja Estate:</b></p> <p>Core work in Bukit Maradja Estate such as harvesters, spraying gang, manuring gang, FFB truck driver, pest &amp; disease census was all permanent fulltime (SKU – Syarat Kerja Umum). Bukit Maradja Estate recruited 64 PKWT workers as loose fruit picker, nursery mandor, dump truck helper, pest &amp; disease census, godown helper.</p> <p>Loose fruit pickers is part of harvesting activities (core work) and contracted as PKWT at the first time recruited. As refer to KEPMENAKER No. 100 Tahun 2004 that PKWT categorized as the process to become a permanent workers, then the company is allow used PKWT in their core work operation.</p>	Complied

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		<p>Because of PKWT is one of the requirements to be permanent employee, therefore this process is shall be in accordance with the contract (maximum of 3 years) since the contract was signed, or according to the results of performance appraisal from the management/supervisor. Contract of PKWT signed between the company (Estate nor Mill) and the worker itself.</p> <p>In example: PKWT contract Bukit Maradja Estate dated 2<sup>nd</sup> January 2021 on behalf Mrs. I** P*****I, her contract with Bukit Maradja Estate with period 6 months (2<sup>nd</sup> Jan 2021 – 31 Jun 2021) as Loose Fruit picker.</p>	
<p><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.</p>			
<p>6.3.1</p>	<p><b>(C)</b> A published statement recognizing freedom of association and right to collective bargaining in national languages is available and is explained to all workers in languages that they understand, and is demonstrably implemented.</p>	<p>PT. Eastern Sumatra Indonesia established Freedom of Association Policy No.QMM-40-01-P13/27-03-2019 signed by President Director on 27 March 2019. The policy stated company recognises the role of lawful and independent workers and employees’ representative organizations in creating a constructive working environment. Company supports the implementation of the laws and regulations of the Republic of Indonesia relevant to freedom of association for workers and employees. The policy available in Bahasa Indonesia.</p> <p><b>Bukit Maradja POM:</b></p> <p>Socialization of freedom of association policy and equal opportunity policy in Bukit Maradja POM carried out on 27 January 2020; attended by 8 workers from mill’s office; 26 workers from Processing Shift A; 25 workers from workshop; 9 workers from gardeners, water treatment plant, dayworkers. Socialization of this policy in Bukit Maradja POM carried out on 17 January 2020; attended by 26 workers from Processing Shift B.</p> <p><b>Kerasaan Estate</b></p>	<p>Complied</p>

		<p>Non-discrimination policy and equal opportunity policy socialization in Kerasaan Estate carried out:</p> <ul style="list-style-type: none"> <li>- 71 workers from Division I Kerasaan Estate dated 15 February 2021;</li> <li>- 69 workers and 15 PKWT/contract workers from Division III Kerasaan Estate, dated 4 January 2021.</li> </ul> <p><b>Bukit Maradja Estate:</b></p> <p>This policy communicated to contractors. For example, sighted the record of freedom of association policy socialization on 23 February 2021. The socialization attended by 10 drivers and helper from PT. Multi Prima Nusa (FFB transporter).</p> <p><b>Timbang Deli Estate:</b></p> <p>PT. Timbang Deli Indonesia established Freedom Association Policy No.TDI-QM/02 signed by President Director on 1 September 2017. The policy stated PT. Timbang Deli Indonesia recognises the role of lawful and independent workers and employees’ representative organizations in creating a constructive working environment. Company supports the implementation of the laws and regulations of the Republic of Indonesia relevant to freedom of association for workers and employees. The policy available in Bahasa Indonesia.</p> <p>The policy disseminated on 1 February 2021: to 10 sprayers, 1 sprayer mandor, 17 harvesters, 2 harvester mandors, 3 pest and disease operators.</p>	
6.3.2	Minutes of meetings between the unit of certification with trade unions or worker representatives who are freely elected, are documented in the national languages and available upon request.	<p><b>Bukit Maradja Estate and Bukit Maradja POM:</b></p> <p>Meeting between Bukit Maradja Estate and Bukit Maradja POM management and worker union carried out on regular basis. Sampled meeting on 13 August 2020. The meeting was attended by Mill Manager, Estate Manager, Public Relation, Independent Laboratory Manager, Training Center Manager, Chairman SPBMM, Public Relation SPBMM, Treasury SPBMM, SPBMM Mill Unit, SPBMM Estate Unit. The meeting</p>	Complied

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		<p>agenda related agreement to extend the Corrective Bargaining Agreement/Perjanjian Kerja Bersama, period 2018-2020 for 1 year.</p> <p><b>Kerajaan Estate:</b> Meeting between Kerajaan Estate management and worker union carried out on regular basis. Sampled meeting on 3 February 2021. The meeting was attended by Estate Manager, Office Assistant, Chairman SPKIM, Secretary SPKIM, Public Relation SPKIM. The meeting agenda related to monthly salary for daily worker and SKU H.</p> <p><b>Timbang Deli Estate:</b> Meeting between Timbang Deli Estate management and worker union carried out on regular basis. Sampled meeting on 20 November 2020. The meeting was attended by Estate Manager, Office Assistant, Chairman SPTDM, Secretary SPTDM, Public Relation SPTDM. The meeting agenda related to warning letter for worker due to in disciplinary action.</p>	
6.3.3	<p>Management does not interfere with the formation or operation of registered labour organizations/unions, or other freely elected representatives for all workers, including migrant and contract workers.</p>	<p><b>Bukit Maradja Estate:</b> Based on interview with representative of worker union in Bukit Maradja Estate the management allows worker union formation to be independent. The worker union member in Bukit Maradja Estate participated in free election of worker union chairman in 2020.</p> <p><b>Kerajaan Estate:</b> Based on interview with representative of worker union in Kerajaan Estate the management allows worker union formation to be independent. The worker union member in Kerajaan Estate participated in free election of worker union chairman in 2020.</p> <p><b>Bukit Maradja POM:</b> Based on interview with representative of worker union in Bukit Maradja POM the management allows worker union formation to be independent.</p>	Complied

		The worker union member in Bukit Maradja POM participated in free election of worker union chairman.	
<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.	<p>PT. Eastern Sumatra Indonesia established Child Labour Policy No.QMM-40-01-P08/27-03-2019 signed by President Director 27 March 2019. Company believes children should have the right to education and a healthy life, and is committed to ensuring that children under the age of 18 years are not employed by the company for any work related purpose. Company fully supports the relevant Republic of Indonesia laws and other international agreements, such as ILO Child Labour Convention, 1999. Company will not knowingly participate in any activities which could be classed as using child labour. In pursuing the objective, the company will ensure that at time of hiring, the age of all worker (permanent or not) is positively checked (if the person) has an ID card or another official document. When no documents are available to check the age, the company worker/manager in charge will use her/his best judgement and can refuse employment in case of doubt. People refused employment on this basis will be informed that they can file a grievance with the company, for a review of their situation. Contractors and other parties performing work for the company are to be informed of this policy, which will be considered as integral part of their contractual obligations toward the company. In the event of an occurrence of child labour being discovered, the relevant manager must be immediately informed and immediate action must be taken to correct the situation. It is the obligation of workers and managers to report child labour activities that they witness or that are reported to them. Disciplinary action is taken against company workers who willfully are in breach of this policy.</p> <p><b>Bukit Maradja POM:</b></p>	Complied



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		<p>Socialization of prohibition of child labour policy and equal opportunity policy in Bukit Maradja POM carried out on 27 January 2020; attended by 8 workers from mill's office; 26 workers from Processing Shift A; 25 workers from workshop; 9 workers from gardeners, water treatment plant, dayworkers. Socialization of this policy in Bukit Maradja POM carried out on 17 January 2020; attended by 26 workers from Processing Shift B.</p> <p><b>Bukit Maradja Estate:</b></p> <p>This policy communicated to contractors. For example, sighted the record of no child labour policy socialization on 23 February 2021. The socialization attended by 10 drivers and helper from PT. Multi Prima Nusa (FFB transporter).</p> <p><b>Kerasaan Estate</b></p> <p>No child labour policy socialization in Kerasaan Estate carried out:</p> <ul style="list-style-type: none"> <li>- 71 workers from Division I Kerasaan Estate dated 8 February 2021;</li> <li>- 69 workers and 15 PKWT/contract workers from Division III Kerasaan Estate, dated 4 January 2021.</li> </ul> <p><b>Timbang Deli Estate:</b></p> <p>Contract for FFB transport: "Surat Perjanjian Kerja No.TDI/BNCP/I/2021/02 antara PT. Timbang Deli Indonesia dengan CV. Biring Ndu Cahaya Panglong tentang Pengangkutan Tandan Buah Segar" signed on 1 January 2021. The contract, section 6 stipulates contractor's responsibilities, i.e. does not employ worker under 18 years old. The policy disseminated on 1 February 2021: to 10 sprayers, 1 sprayer mandor, 17 harvesters, 2 harvester mandors, 3 pest and disease operators.</p>	
6.4.2	<p><b>(C)</b> Documented evidence on the fulfilment of worker's minimum age requirements in accordance with applicable regulation and verification procedures for age requirements, are available.</p>	<p>PT. Eastern Sumatra Indonesia demonstrated document Manpower establishment.</p>	<p>Complied</p>

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		<p>- Bukit Maradja Estate, as of 1 February 2021; total manpower 359 personnel. Youngest worker I***** W*****, No.50196, birth date 20 March 2020, first date of work 1 October 2020 – at 20 years and 7 months. KTP/ID card checked and verified.</p> <p><b>Bukit Maradja POM</b></p> <p>- Bukit Maradja POM, as of February 2021; total manpower 100 personnel. Youngest worker P**** S*****, birth date 16 June 2001, first date of work 1 August 2021 – at 19 years and 2 months. KTP/ID card checked and verified.</p> <p>- Contract: "Surat Perjanjian Kerja No.03/BMM-HO/ENG/2020 antara PT. Eastern Sumatra Indonesia dengan PT. Atmindo tentang Rekondisi Packing Groove Sterilizer No.1" signed on 25 February 2020. The contract, section 8 stipulates Contractor shall abide to Company Policy: prohibit child worker, does not employ worker under 18 years old. Verification through medical certificate and ID card verification, the youngest worker born 1996 (24 years).</p> <p><b>PT. Timbang Deli Indonesia:</b></p> <p>- Timbang Deli Estate, as of February 2021; total manpower for oil palm was 41 workers. Youngest worker A***** E** S*****, birth date 30 November 1993 (now 28 years), first date of work 1 February 2012 – at 19 years and 9 months. KTP/ID card checked and verified.</p>	
6.4.3	<b>(C)</b> Young person maybe employed only for non-hazardous work with protective restrictions in place for that work.	No worker under 18 years old employed by PT. Eastern Sumatra Indonesia, PT. Kerasaan Indonesia, PT. Timbang Deli Indonesia.	Complied
6.4.4	The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.	<p><b>Bukit Maradja POM:</b></p> <p>Socialization of prohibition of child labour policy and equal opportunity policy in Bukit Maradja POM carried out on 27 January 2020; attended by 8 workers from mill's office; 26 workers from Processing Shift A; 25 workers from workshop; 9 workers from gardeners, water treatment plant, dayworkers. Socialization of this policy in Bukit Maradja POM</p>	Complied

		<p>carried out on 17 January 2020; attended by 26 workers from Processing Shift B.</p> <p><b>Bukit Maradja Estate:</b></p> <p>This policy communicated to contractors. For example, sighted the record of no child labour policy socialization on 23 February 2021. The socialization attended by 10 drivers and helper from PT. Multi Prima Nusa (FFB transporter).</p> <p><b>Kerasaan Estate</b></p> <p>No child labour policy socialization in Kerasaan Estate carried out:</p> <ul style="list-style-type: none"> <li>- 71 workers from Division I Kerasaan Estate dated 8 February 2021;</li> <li>- 69 workers and 15 PKWT/contract workers from Division III Kerasaan Estate, dated 4 January 2021.</li> </ul> <p><b>Timbang Deli Estate:</b></p> <p>The policy disseminated on 1 February 2021: to 10 sprayers, 1 sprayer mandor, 17 harvesters, 2 harvester mandors, 3 pest and disease operators.</p>	
<b>Criteria 6.5:</b> There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	<p><b>(C)</b> A policy to prevent sexual and all other form of harassment and violence is documented, implemented and communicated to all levels of the workforce.</p>	<p>PT. Eastern Sumatra Indonesia established Sexual Harassment Policy No.QMM-40-01-P10/27-03-2019 signed by President Director on 27 March 2019. The policy stated PT. Eastern Sumatra Indonesia is committed to ensuring harmonious and productive work environment for its workers. This commitment recognizes that the workplace should be free of sexual harassment. Sexual harassment is unwanted, unwelcome, and offensive behavior and will not be tolerated under any circumstances. PT. Eastern Sumatra Indonesia supports a strict implementation of the laws and regulations of Republic of Indonesia punishing sexual harassment. All report of sexual harassment will be dealt with a sympathetic and confidential manner to help achieve fair</p>	Complied

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		<p>hearings of the reports. No person/whistleblower is to be victimized for reporting sexual harassment.</p> <p><b>Bukit Maradja POM:</b> Socialization of prohibition of sexual harassment policy in Bukit Maradja POM carried out on 27 January 2020; attended by 8 workers from mill's office; 26 workers from Processing Shift A; 25 workers from workshop; 9 workers from gardeners, water treatment plant, dayworkers. Socialization of this policy in Bukit Maradja POM carried out on 17 January 2020; attended by 26 workers from Processing Shift B.</p> <p><b>Bukit Maradja Estate:</b> This policy communicated to contractors. For example, sighted the record of prevention of sexual harassment policy socialization on 23 February 2021. The socialization attended by 10 drivers and helper from PT. Multi Prima Nusa (FFB transporter).</p> <p><b>Kerasaan Estate</b> Policy to prevent sexual and all other form of harassment and violence socialization in Kerasaan Estate carried out: - 71 workers from Division I Kerasaan Estate dated 10 February 2021; - 69 workers and 15 PKWT/contract workers from Division III Kerasaan Estate, dated 4 January 2021.</p> <p>PT. Timbang Deli Indonesia established Sexual Harassment Policy No.TDI-QM/08 signed by President Director on 1 September 2017. The policy stated PT. Timbang Deli Indonesia is committed to ensuring harmonious and productive work environment for its workers. This commitment recognizes that the workplace should be free of sexual harassment. Sexual harassment is unwanted, unwelcome, and offensive behavior and will not be tolerated under any circumstances. PT. Timbang Deli Indonesia supports a strict implementation of the laws and regulations of Republic of Indonesia punishing sexual harassment.</p>	
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		<p>Sexual harassment can take many different forms and may include physical contact, verbal comment jokes, propositions, the display of offensive material or other behavior. All reports of sexual harassment will be dealt with in a sympathetic and confidential manner to help achieve fair hearing of the reports. No employee is to be victimized for reporting sexual harassment. Sexual harassment applies equally to male and female employees. Co-workers should be treated in a respectful and courteous manner, respectfully of their sensibilities.</p> <p>The policy disseminated on 1 February 2021: to 10 sprayers, 1 sprayer mandor, 17 harvesters, 2 harvester mandors, 3 pest and disease operators.</p>	
6.5.2	<p><b>(C)</b> A policy to protect the reproductive rights of all, especially of women, is documented, implemented and communicated to all levels of the workforce.</p>	<p><b>Bukit Maradja Estate:</b> Implementation breastfeeding opportunity in form of "Memorandum Bukit Maradja Estate Manager tentang Pemeliharaan Bayi Pekerja Wanita No.11/BME-PG/II/2020", dated 13 February 2020; the memo stipulates company referring to Collaborative Working Agreement Chapter XIV point 5.b. giving breastfeeding female worker is given opportunity/time to breastfeed their children for 30 minutes from 10.00 – 10.30AM.</p> <p><b>Kerasaan Estate:</b> Implementation breastfeeding opportunity in form of "Memorandum Kerasaan Estate Manager tentang Pemeliharaan Bayi Pekerja Wanita", dated 10 February 2021; the memo stipulates company referring to Collaborative Working Agreement Chapter XIV point 5.b. giving breastfeeding female worker is given opportunity/time to breastfeed their children for 30 minutes from 10.00 – 10.30AM.</p> <p>Policy to protect reproductive rights in Kerasaan Estate carried out:</p> <ul style="list-style-type: none"> <li>- 71 workers from Division I Kerasaan Estate dated 13 February 2021;</li> <li>- 69 workers and 15 PKWT/contract workers from Division III Kerasaan</li> </ul>	Complied

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		<p>Estate, dated 4 January 2021.</p> <p><b>Bukit Maradja POM:</b>            Socialization of protection of reproductive right policy in Bukit Maradja POM carried out on 27 January 2020; attended by 8 workers from mill’s office; 26 workers from Processing Shift A; 25 workers from workshop; 9 workers from gardeners, water treatment plant, dayworkers. Socialization of this policy in Bukit Maradja POM carried out on 17 January 2020; attended by 26 workers from Processing Shift B.</p> <p>This policy communicated to contractors. For example, sighted the record of protecting reproductive rights policy socialization on 23 February 2021. The socialization attended by 10 drivers and helper from PT. Multi Prima Nusa (FFB transporter).</p> <p><b>Timbang Deli Estate:</b>            PT. Timbang Deli Indonesia established Protection of Reproductive Rights Policy No.TDI-QM/09 signed by President Director dated 1 September 2017. PT. Timbang Deli Indonesia is committed to protecting the reproductive rights of its employees and to provide medical services associated with reproductive health. PT. Timbang Deli Indonesia ensure that couples and individuals seeking medical services related to reproductive and sexual health are accommodated. Ensure that couples or individuals can freely decide when and how many children they want and guarantee the right to information on conception. The policy disseminated on 1 February 2021: to 10 sprayers, 1 sprayer mandor, 17 harvesters, 2 harvester mandors, 3 pest and disease operators.</p>	
6.5.3	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified in accordance with applicable regulations in Indonesia.</p>	<p>PT. Eastern Sumatra Indonesia and worker union has agreed on breastfeeding time, as stipulated in “Perjanjian Kerja Bersama (PKB) PT. Tolan Tiga Indonesia dengan Pengurus Serikat Pekerja Tolan Tiga Mandiri (SPTTM) periode 2018-2020”, Chapter XIV – Section 5.b. “Pengusaha memberikan kesempatan yang cukup kepada pekerja</p>	Complied

		<p>wanita untuk menyusukan anaknya” – company provides sufficient opportunity for female worker to breastfeed their children.</p> <p><b>Bukit Maradja Estate</b></p> <p>Consultation conducted via questionnaire “Formulir Interview dengan Ibu Baru Bersalin/Menyusui”, filled in by respondent field assistant on 30 March 2020. The questionnaire: status of work? presence of children needing breastfeeding? exclusive breastfeeding? breastfeeding frequency? breastfeeding timeframe? permission from company for breastfeeding time? breastfeeding frequency during working hour? breastfeeding time adequate? provision of specific place for breastfeeding? pay deduction for time used during breastfeeding time? Provision of access to information related to breastfeeding consultation, baby health and vaccination?</p> <p>Implementation breastfeeding opportunity in form of “Memorandum Bukit Maradja Estate Manager tentang Pemeliharaan Bayi Pekerja Wanita No.11/BME-PG/II/2020”, dated 13 February 2020; the memo stipulates company referring to Collaborative Working Agreement Chapter XIV point 5.b. giving breastfeeding female worker is given opportunity/time to breastfeed their children for 30 minutes from 10.00 – 10.30AM.</p> <p><b>Timbang Deli Estate:</b></p> <p>Implementation breastfeeding opportunity in form of “Memorandum Kreasaan Estate Manager tentang Pemeliharaan Bayi Pekerja Wanita No.09/TDE/II/2020”, dated 10 February 2020; the memo stipulates company referring to Collaborative Working Agreement Chapter XIV point 5.b. giving breastfeeding female worker is given opportunity/time to breastfeed their children for 30 minutes from 10.00 – 10.30AM.</p> <p>Consultation conducted via questionnaire “Formulir Interview dengan Ibu Baru Bersalin/Menyusui”, filled in by respondent field assistant on 18 February 2020 for Mrs. Wulandari, Mrs. Febrian, Mrs. Intan Trifani.</p>	
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<p>6.5.4</p>	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, as long as the complaint is supported with adequate information, is documented, implemented and communicated to all levels of the workforce.</p>	<p>PT. Eastern Sumatra Indonesia refers to Grievance Policy (Kebijakan Keluh Kesah) No.QMM-40-01-P12/27-03-2019/Rev, signed by President Director on 27 March 2019</p> <p>Grievance resolution refers to SOP "Grievance Procedure - Prosedur Keluh Kesah No.IAD-01-08/22-01-2020/Rev.0" dated 30 January 2020. This procedure provides guidance on how to accommodate grievance from external and internal. The procedure completed with flowchart. Internal Audit Department Manager receive complaint through email, whatsapp and message to grievance box. All complainants are to be given a response within 3 days. For grievance that cannot be handled locally this iss issued by Internal Audit Department using the complainant contact details provided or directly send to email. For relevant grievances, Internal Audit Department will send information from complainant to the Department concerned, copying Director of Sustainability and President Director. Subject heading must read "Grievance, Operating Unit, Date". Department concerned collect information and documents to answer question of complainant. A formal response referencing the original grievance will be sent within 30 days, and will be informed if more than 30 days.</p> <p>Informing the complainant have to answer within two weeks. Complainants should confirm that they are satisfied within two weeks, if no answer the case will be closed.</p> <p><b>Bukit Maradja POM:</b></p> <p>Socialization of mechanism to grievance resolution in Bukit Maradja POM carried out on 27 January 2020; attended by 8 workers from mill's office; 26 workers from Processing Shift A; 25 workers from workshop; 9 workers from gardeners, water treatment plant, dayworkers. Socialization of this policy in Bukit Maradja POM carried out on 17 January 2020; attended by 26 workers from Processing Shift B.</p> <p><b>Bukit Maradja Estate:</b></p>	<p>Complied</p>
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		<p>Report of complaint and grievance recorded in "Log Book Keluh Kesah Internal/Eksternal". Based on review, in period 2020, recorded 8 complaint/grievances, sample:</p> <ul style="list-style-type: none"> <li>- Date 15 July 2020, complaint from Berton H. Simbolon, Internal; water closet clogged in house No.151 under name Bejo. Response from Bukit Maradja Estate on 18 July 2020; Disposition fom Estate Manager with decision approved for renovation. Renovation carried out on same day. PIC: Dadang Sunaryo.</li> <li>- Date 3 October 2020, complaint from Cecilia N Depari, Internal; Septic tank broken in worker house No.37B under name Sumiata. Bukit Maradja Estate responded on 7 October 2020; Disposition fom Estate Manager with decision approved for renovation. Renovation carried out on same day. PIC: Dadang Sunaryo.</li> </ul> <p>Date 21 December 2020, complaint from village Pangulu Pematang Sakhuda, External; The content: request to gather grass during subuh time/04.00-05.00AM. Bukit Maradja Estate Manager responded on 21 December 2020; Estate Manager directly stated company does not allows grass cutting for cattle feeding on subuh time. Company has already provided time for grass cutting for cattle feeding on 06.00AM – 18.00PM. Company worries for safety reason. PIC/responder <i>Estate Manager</i>/Mr. Risal.</p>	
<p><b>Criteria 6.6:</b> No forms of forced or trafficked labour are used.</p>			
<p>6.6.1</p>	<p><b>(C)</b> All work is voluntary and the 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 without worker’s consent</li> <li>• Involuntary overtime;</li> <li>• Lack of freedom of workers to resign</li> </ul>	<p>Based on interview with workers, worker union representative, and manpower service Simalungun Regency, stated that the unit of certification does not practiced forced labour:</p> <ul style="list-style-type: none"> <li>- Retention of identity documents or passports: Interview with PKWT worker in Bukit Maradja POM, Kerasaan Estate, Timbang Deli Estate, their ID card was not hold by company.</li> </ul>	<p>Complied</p>

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	<ul style="list-style-type: none"> <li>• Penalty for termination of employment, unless the unit of certification and the workers agree to the penalty and it is stated in the employment agreement</li> <li>• Debt bondage</li> <li>• Withholding of wages</li> </ul>	<ul style="list-style-type: none"> <li>- Payment of recruitment fees: Interview with PKWT worker in Bukit Maradja POM, Kerasaan Estate, Timbang Deli Estate, during their application and recruitment in September 2020, not paying any recruitment fees.</li> <li>- Contract substitution: Interview with PKWT worker in Bukit Maradja POM, Kerasaan Estate, Timbang Deli Estate, their contract with company under PKWT signed and consistently implemented.</li> <li>- Involuntary overtime: Interview with harvesters in Kerasaan Estate and Bukit Maradja Estate, company offers overtime/additional harvesting work during peak crop (usually on Sunday), but it was up to individual worker to decide whether they joined overtime.</li> <li>- Lack of freedom of workers to resign: Based on interview with herbicide sprayers in Timbang Deli Estate, Kerasaan Estate, they can resign anytime – following regulation in PKB (one-month notice).</li> <li>- Penalty for termination of employment: Based on interview with herbicide sprayers in Timbang Deli Estate, Kerasaan Estate, they can resign any time and no penalty imposed – following regulation in PKB (one-month notice).</li> <li>- Debt bondage: Interview with harvesters in Timbang Deli Estate, Kerasaan Estate, they understand forced labor. There is no debt bondage.</li> <li>- - Withholding of wages: Interview with fertilizer applicators in Timbang Deli Estate, Kerasaan Estate, wage paid every month. There is no salary withholding.</li> </ul>	
6.6.2	<b>(C)</b> Where temporary (Specified Time Work Agreement/PKWT) or migrant workers are employed, a specific labour policy and procedures are established and evidence of implementation is available.	PT. Eastern Sumatra Indonesia established a set of procedure for recruitment of temporary worker (Specified Time Work Agreement/PKWT).	Complied

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		<p>There is no migrant worker in PT. Eastern Sumatra Indonesia – confirmed with Manpower Service of Simalungun Regency and Worker Union.</p> <p>Within the Ethics Policy described Compliance all relevant international and national laws will be upheld.</p> <p>The Ethical Policy mentioned:</p> <p>It is necessary to prepare the Company’s internal guidelines related to the implementation of the principles of Good Corporate Governance (GCG), along with the development of the prevailing laws and regulations related to the Company, including:</p> <ul style="list-style-type: none"> <li>- Republic of Indonesia Law No. 40 of 2007 concerning Limited Liability Companies.</li> <li>- <b>Republic of Indonesia Law No. 13 of 2003 concerning Manpower.</b></li> <li>- Supreme Court Regulation No. 13 of 2016 concerning Procedures for Handling Corporate Criminal Cases.</li> </ul> <p>Regulation related PKWT was under Manpower Ministry Decree “KEPMENAKERTRANS NO. 100 TAHUN 2004” which is this Manpower Ministry Decree is derivative of Republic of Indonesia Law No. 13 of 2003.</p> <p>PKWT or Specific Time Work Agreement as per Keputusan Menteri Tenaga Kerja No. 100 Tahun 2004 is working agreement between workers and employers to organize the working relationship within a certain time or for a particular worker.</p> <p>As refer to KEPMENAKER No. 100 Tahun 2004 that PKWT categorized as the process to become a permanent workers, then the company is allow used PKWT in their core work operation.</p> <p>Because of PKWT is one of the requirements to be permanent employee, therefore this process is shall be in accordance with the contract</p>	
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		<p>(maximum of 3 years) since the contract was signed, or according to the results of performance appraisal from the management/supervisor. Contract of PKWT signed between the company (Estate nor Mill) and the worker itself.</p> <p>SOP Recruitment for PKWT No.HRD-01-03/09-03/2020/Rev.2 dated 17 March 2020. This SOP regulates the recruitment process for temporary worker are done according to valid procedures and approved manpower plan. The SOP stated Office Assistant/ Field Assistant/ Mill Assistant prepare a proposal for PKWT based on budget available, work experience, achievements. Proposal verified by Field Head Assistant/ Mill Head Assistant/ Technical Head Assistant and sent to Regional Manager Office. General Manager/ Regional Director verified and approved the employee request. Office Assistant create work agreement which is signed by Estate Manager/ Mill Manager and PKWT.</p> <p>Section 10 of the SOP stipulates that Free Labour and PKWT are not allowed to do the main work such as harvesting and processing. PKWT can only be implemented for a maximum 2 (two) years with following conditions: first PKWT no longer than 1 year. The second PKWT no longer than 1 year. Furthermore, if approved by BOD, renewal of extension of PKWT can only held after exceeding 30 (thirty) days grace period since the end of second PKWT and may only be done 1 (one) time and a maximum of 2 (two).</p> <p>PKWT shall be registered with BPJS Ketenagakerjaan and BPJS Kesehatan program.</p> <p>The basis of payment for PKWT wages per day is UMP/UMSP/UMK/UMSK divided by 25 if working time is 6 days a week or divided by 21 if working time is 5 days a week.</p> <p>Evidence: "Perjanjian Kerja Waktu Tertentu Mukisa dan PT. Eastern Sumatra Indonesia Bukit Maradja Estate", signed on 2 January 2021. The PWKT</p>	
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		<p>stipulates: Clause 1: PKWT for Mukisa as general worker; PKWT period 1 January 2021 – 30 June 2021 (6 months). Clause 4: Salary paid per month, equal to UMP/UMSP/UMK/UMSK applicable to the company Rp. 2,607,089. Clause 5: Company provides medical treatment for employee as per regulation. Clause 7: Company will register employee to Jamsostek.</p> <p>“Perjanjian Kerja Waktu Tertentu Era Mayer Dwi Putri dan PT. Timbang Deli Indonesia”, signed on 1 February 2021. The PWKT stipulates: Clause 1: PKWT for Era Mayer Dwi Putri as kindergarten teacher; PKWT period 1 February 2021 – 31 January 2022 (12 months). Clause 4: Salary paid per month, equal to UMP/UMSP/UMK/UMSK applicable to the Deli Serdang of Rp. 3,188,592. Clause 6: Company provides medical treatment for employee as per regulation. Clause 8: Company will register employee to Jamsostek.</p>	
<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	<p><b>(C)</b> The responsible person(s) for H&amp;S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p>	<p>PT. Eastern Sumatra Indonesia has established Occupational Health and Safety Policy No.QMM-40-01-P04/27-03-2019 dated 27 March 2019. PT. Tolan Tiga Indonesia recognizes that a safe and healthy workplace is of the utmost importance. We therefore committed to provide a safe working environment for our workers and all other stakeholders. Company believe in continually improving our health and safety and this will be achieved through: hazards and risks identification and reduction, provision of adequate resources for effective implementation of the OHS programmes and procedures, including strict compliance reviews; Ensuring the OHS policy and procedures integrate with all other company policies.</p> <p><b>Bukit Maradja Estate:</b></p> <p>Safety Officer, Mr. Dadang Sunaryo has competence as per “Sertifikat Pembinaan dan Pengawasan Norma Keselamatan dan Kesehatan Kerja (K3)” dated 4 December 2019. The safety officer appointment as per</p>	Complied

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		<p>"Keputusan Menteri Ketenagakerjaan Republik Indonesia No.5/8816/AS.02.04/XII/2019 tentang Penunjukan Ahli Keselamatan dan Kesehatan Kerja Umum atas nama Dadang Sunaryo" dated 4 December 2019 and valid 3 years.</p> <p>The record of company's health and safety policy socialization on 23 February 2021. The socialization attended by 10 drivers and helper from PT. Multi Prima Nusa (FFB transporter).</p> <p><b>Bukit Maradja POM:</b></p> <p>The safety officer appointment as per "Keputusan Menteri Ketenagakerjaan Republik Indonesia No.5/9320/AS.02.04/X/2020 tentang Penunjukan Ahli Keselamatan dan Kesehatan Kerja Umum atas nama Fotuho Gulo" dated 19 October 2020 and valid 3 years.</p> <p>Socialization of health and safety policy in Bukit Maradja POM carried out on 27 January 2020; attended by 8 workers from mill's office; 26 workers from Processing Shift A; 25 workers from workshop; 9 workers from gardeners, water treatment plant, dayworkers. Socialization of this policy in Bukit Maradja POM carried out on 17 January 2020; attended by 26 workers from Processing Shift B.</p> <p>Company had safety meeting with PT. Atmindo regarding "Rekondisi Packing Groove Sterilizer No.1". Meeting carried out on 6 August 2020 including 7 contractor's workers, COVID-19 mitigation, job safety analysis.</p> <p><b>Kerasaan Estate</b></p> <p>Policy related to Occupational Health and Safety in Kerasaan Estate carried out:</p> <ul style="list-style-type: none"> <li>- 71 workers from Division I Kerasaan Estate dated 6 February 2021;</li> <li>- 69 workers and 15 PKWT/contract workers from Division III Kerasaan Estate, dated 4 January 2021.</li> </ul>	
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		<p>Safety officer in Kerasaan Estate under name Ade Rani Agustina has competence as per "Sertifikat Pembinaan Pengawasan Norma Keselamatan dan Kesehatan Kerja (K3) No.5/7883/AS.02.04/XII/2019 " dated 4 December 2019. The appointment of safety officer as per "Keputusan Menteri Ketenagakerjaan Republik Indonesia No.5/8814/AS.02.04/XII/2019 tentang Penunjukan Ahli Keselamatan dan Kesehatan Kerja Umum atas nama Ade Rani Agustina" dated 4 December 2019 and valid for 3 years.</p> <p>Safety committee meeting period December 2020 discussed: employee housing inspection, clinic inspection, material warehouse inspection, workshop inspection, office inspection result, hazardous waste storage and COVID-19 situation.</p> <p>Safety officer in Timbang Deli Estate appointed as per "Keputusan Menteri Ketenagakerjaan RI No.KEP.17544/NAKER-BINWASK3/V/2018 tentang Penunjukan Ahli Keselamatan dan Kesehatan Kerja Umum atas nama Aprizal, dated 2 May 2018 – valid for 3 years. Kartu Tanda Kewenangan Ahli K3 No.Reg.53563/PK3/AJ/12/2018/P0, dated 2 May 2018 – 2 May 2021.</p> <p>Safety committee acknowledged by the manpower service Deli Serdang Regency, as per Keputusan Kepala UPT Pengawasan Ketenagakerjaan Wilayah II Dinas Tenaga Kerja Provinsi Sumatera Utara No.101-7/DTK/WIL II/SU/2021 tentang Pengesahan Panitia Pembina Keselamatan dan Kesehatan Kerja di Perusahaan PT. Timbang Deli Indonesia", dated 10 February 2021.</p> <p>Minutes of safety committee meeting "Notulen Rapat P2K3LHS PT. Timbang Deli Indonesia Verdant Bioscience", dated 11 February 2021. The meeting discusses work accident, PPE provision, training and management of first aid, medical treatment for employee.</p> <ul style="list-style-type: none"> <li>- The OHS policy disseminated on 1 February 2021: to 10 sprayers, 1 sprayer mandor, 17 harvesters, 2 harvester mandors, 3 pest and</li> </ul>	
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		disease operators.	
6.7.2	Accident and emergency procedures in Indonesian language are in place and clearly understood by all workers. Assigned operatives trained in first aid are present in both field and other operations. First aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.	<p>Accident and emergency procedures available in SOP First Aid No.OHS-01-04; SOP Land Fire and Prevention Control No. OHS-01-12; SOP Emergency Response No.OHS-03-01. All SOP and work instruction available in Bahasa Indonesia and communicated in Bahasa Indonesia to worker.</p> <p><b>Kerasaan Estate</b> Policy related to Occupational Health and Safety, as well as emergency work instruction in Kerasaan Estate carried out: - 71 workers from Division I Kerasaan Estate dated 6 February 2021; - 69 workers and 15 PKWT/contract workers from Division III Kerasaan Estate, dated 4 January 2021.</p> <p><b>Timbang Deli Estate:</b> Training on first aider dated 11 February 2021 for all mandors.</p>	Complied
6.7.3	<b>(C)</b> Workers use appropriate personal protective equipment (PPE) which is provided free of charge to all workers in the workplace, to cover all potentially hazardous operations, such as pesticides application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.	<p><b>Bukit Maradja Estate:</b> PPE provision and handover to worker recorded. Sighted: "Dokumen Bukti Pemberian APD Spraying" stipulates 17 sprayers and spraying mandor received PPE: respirator mask, goggle on 20 October 2020, for sampled worker Riatik, Agus Buhari, Herman, Yusnetti. On the same date, 5 sprayers provided with apron and hand glove. PPE provision and handover to worker recorded. Sighted: "Dokumen Bukti Pemberian APD Spraying" shoes 3 trunk injectors received PPE: respirator mask, earplug, goggle, hand gloves on 4 February 2021, for sampled worker Fadli Ismail, M. Yudi, Dedi Ramadhani.</p> <p><b>Kerasaan Estate:</b> PPE provision and handover to worker recorded. Sighted: "Serah Terima Konvensasi APD Divisi III" recording handover of PPE such as gumboot for 6 harvesters, on 2 November 2020.</p>	Complied



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		<p>"Serah Terima Konvensasi APD Divisi II" stipulates 29 fertilizer applicators received PPE: gumboot, on 3 November 2020; hand glove and masker, on 13 January 2021; hand glove, on 1 March 2021;</p> <p><b>Timbang Deli Estate:</b> PPE provision and handover to worker recorded. Sighted: "Summary Pemberian APD bagi Pekerja" indicated 10 sprayers (interviewed Mujilah, Lilis PS, Misnah) received goggle, respiratory mask, rubber glove on 3 November 2020. "Summary Pemberian APD bagi Pekerja" indicated 10 sprayers (interviewed Mujilah, Lilis PS, Misnah) received wearpack on 30 July 2020. "Summary Pemberian APD bagi Pekerja" indicated 11 sprayers (interviewed Mujilah, Lilis PS, Misnah) received gumboot on 18 December 2020. "Summary Pemberian APD bagi Pekerja" indicated 5 sprayers (interviewed Misnah) received replacemen for apron on 5 March 2021.</p> <p>"Summary Pemberian Alat Kerja/APD Divisi II" stipulates 17 harvesters received PPE: gumboot, on 31 December 2020.</p> <p><b>Bukit Maradja POM:</b> PPE provision and handover to worker recorded. Sighted: "Daftar Serah Terima Alat Pelindung Diri" stipulates 4 mechanics in workshop received PPE: safety glove on 5 February 2021, for sampled worker Sutranto, Yudi. 9 workers (chain capstan operators, sterilizer operator, loading ramp operator, boiler operator) in processing shift A received safety glove on 19 January 2021. 4 engine room workers received ear plugs on 3 September 2020, received safety shoes and wear pack on 12 May 2020, safety goggles on 4 December 2020.</p> <p>PPE provision and handover to worker recorded. Sighted: "Dokumen Bukti Pemberian APD Spraying" shoes 3 trunk injectors received PPE: respirator mask, earplug, goggle, hand gloves on 4 February 2021, for sampled worker Fadli Ismail, M. Yudi, Dedi Ramadhani.</p>	
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6.7.4	<p>All workers are provided medical care and covered by accident insurance. Costs incurred from work related incidents, leading to injury or illness, are covered in accordance with applicable regulations or by the unit of certification if applicable regulations do not provide protection.</p>	<p>Based on direct interview with sample of workers visited, the workers stated that medical and accident insurance are covered under "BPJS Ketenagakerjaan" and "BPJS Kesehatan" and it's provided by the company. An accident insurance is covered under "BPJS Ketenagakerjaan" with Accident and Life Program (JKK and JK).</p> <p>According to Employee Database February 2021:</p> <p>Bukit Maradja POM: total employees covered by accident insurance (BPJS Ketenagakerjaan) is 87 permanent employees and 13 specified time work agreement (PKWT).</p> <p>Bukit Maradja Estate: total employees covered by accident insurance (BPJS Ketenagakerjaan) is 295 permanent employees and 63 specified time work agreement (PKWT).</p> <p>Kerasaan Estate: total employees covered by accident insurance (BPJS Ketenagakerjaan) is 215 permanent employees and 45 specified time work agreement (PKWT).</p> <p>Timbang Deli Estate: total employees covered by accident insurance (BPJS Ketenagakerjaan) is 207 permanent employees and 5 specified time work agreement (PKWT), 23 free labour. Bill payment dated 16 Feb 2021, transaction reference No: 202102161404432578 (permanent workers) and 202102161405433196 (stwa/pkwt).</p>	Complied
6.7.5	<p>Occupational injuries are recorded using Lost Time Accident (LTA) metrics.</p>	<p>Summary of Work Incident 2020 Bukit Maradja Estate:          There are 4 cases incident occurs consist of 3 harvester and 1 teacher. Total Lost Time Incident is 15 LTI.</p> <p>Summary of Work Incident 2020 Kerasaan Estate:          There are 2 cases incident occurs from 2 harvesters with total Lost Time Incident is 6 LTI. Those cases already reported and claim to accident insurance services (BPJS Ketenagakerjaan).</p> <p>Summary of Work Incident 2020 Bukit Maradja POM:</p>	Complied

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		<p>There is only one case incident occurs from helper sterilizer with total Lost Time Incident is 2 LTI. Those cases already reported and claim to accident insurance services (BPJS Ketenagakerjaan).</p> <p>Summary of Work Incident 2020 Timbang Deli Estate:</p> <p>There are 6 cases incident occurs from 3 harvesters, 1 upkeep worker, 1 pollinator worker and 1 tapper (rubber) with total Lost Time Incident is 11 LTI. Those cases already reported and claim to accident insurance services (BPJS Ketenagakerjaan).</p>	
<p><b>Principle 7: Protect the environment, conserve biodiversity and ensure sustainable management of natural resources.</b></p>			
<p><b>Criteria 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.</b></p>			
<p>7.1.1</p>	<p><b>(C)</b> IPM plans are implemented and monitored to ensure effective pest control.</p>	<p>Integrated Pest Management plan in Bukit Maradja Estate is evident, as titled "Program Pengendalian Hama Terpadu 2021", established 2 January 2021. 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. "Owl Monitoring" Division 1 BME, observed barn owl box in Block 05E03A and 97E26A in good condition. Field visit of barn-owl box was conducted in Block 97E26A, it was in good condition. In Division 4, barn-owl box available at Block 01E05A. Upkeep of beneficial plant verified as in document "Oil Palm, <i>Mucuna bracteata</i> and Beneficial Plant Nursery Report" dated 2 January 2021, observed that there is 31,000 polybag of <i>Mucuna bracteata</i>, 291,750 polybag of <i>Turnera subulatta</i>, 640 polybag of <i>Antigonon leptopus</i> and 1,262 polybag of <i>Casia cobanensis</i>. At Division 1 Bukit Maradja Estate has been planted 50 cuttings at Block 19D11A, 26 cuttings at Block 19D12A, 27 cuttings at Block 19D13A, 25 cuttings at Block D14A and 23 cuttings at Block D15A. At Division 4 has been planted Turnera 50 cuttings at Block 15E13, 50 cuttings at Block 15E14, 100 cuttings at Block 03F03A and 100 cuttings at Block 03F04A: planted</p>	<p>Complied</p>

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		<p>Antigonon 20 bags at Block 97E10A, 20 bags at Block 97E11, 50 bags at Block 03F03A and 50 bags at Block 03F04A.</p> <p>Infestation of leaf eater caterpillar can be seen on "Laporan Pest &amp; Disease", for period January 2021 in Bukit Maradja Estate Division 1, infestation of bagworm is light (441.69 Ha) and medium 34.50 Ha); nettle caterpillar infestation is light (398.88 Ha) and heavy (64.26 Ha). In Division 2, bagworm infestation is light (291.69 Ha); nettle caterpillar infestation is light (502.02 Ha), medium (25.97 Ha) and heavy (246.17 Ha). Control has been done by hand picking, trunk injection and biological method – imago trap.</p> <p>Since February 2021, there are 4 unit of imago trap installed in Division 2 and 4 unit installed in Division 4. Since then, there total 98 imago's trapped in Division 2 and 820 imago's trapped in Division 4 until the present. Based on "Program Pemasangan Imago Trap Tahun 2021", there are another 12 unit of imago trap installed in Bukit Maradja Estate.</p> <p>Integrated Pest Management plan in Kerasaan Estate is evident, as titled "Program Pengendalian Hama Terpadu 2021", established 6 January 2021. 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" Division 1 Kerasaan Estate. In February 2021 found that attack level have been reduced to "light", since it heavy in December 2020.</p> <p>Planting beneficial plant observed on "Program Penanaman Beneficial Plant Tahun 2021" in Division 2 has been planted Turnera subulatta in 44 polybags in January and 48 polybags in February.</p> <p>Release of Sycanus (predator of nettle caterpillar) in Kerasaan Estate reported 564 sycanus has been release on 2 March 2021 at Block 14C06 and 14C07, Division 1.</p>	
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		<p>Owl monitoring in Division 2 Kerasaan Estate, there are 21 barn-owl boxes, found 9 boxes are occupied, at Block I01, G02, G05, I05, J05, G06A, J09A, I08A and H09A.</p> <p>Integrated Pest Management plan in Timbang Deli Estate is evident, as titled "Program Pengendalian Hama Terpadu 2021", established 18 January 2021. Program consist of Nursery Beneficial Plant; Planting <i>Turnera</i>; Upkeep <i>Turnera</i>; Planting <i>Casia tora</i>, Upkeep <i>Casia tora</i>; Planting <i>Antigonon</i>; Upkeep <i>Antigonon</i>; Pest &amp; Disease Census; upkeep Barn owl box and monitoring.</p> <p>Based on document Nursery Beneficial Plant period February 2021, there are 1,807 polybags of <i>Turnera</i> sp., 1900 polybags of <i>Casia</i> sp., 1,981 polybags of <i>Antigonon</i> sp. Based on document Beneficial Plant Planting on Field, stipulated in Block 18C03 and 00C03 has been planted 193 <i>Turnera</i> sp., 100 <i>Casia</i> sp. and 19 <i>Antigonon</i> sp.</p> <p>Barn-owl monitoring documented in Checklist Pemeriksaan Gupon, stipulated that in Oil Palm Division Timbang Deli Estate there are barn-owl boxes in Block 15B04, 17C02 and 16D01, all in good condition.</p>	
7.1.2	Invasive species are not to be used according to applicable regulation in managed areas, unless plans to prevent and monitor their spread are implemented.	The unit of certification has a list of Global Invasive Species, and evaluate the status of existence in Bukit Maradja Estate on 1 February 2021, in Kerasaan Estate on 17 February 2021, in Timbang Deli Estate on 17 February 2021. 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 cylindrica</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.	Complied
7.1.3	There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities.	Based on field visit and document review, there is no use of fire for pest control in whole area of Bukit Maradja Estate, Kerasaan Estate and Timbang Deli Estate.	Complied

**Criteria 7.2:** Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.

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7.2.1	<p><b>(C)</b> Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p>	<p>The unit of certification has recorded list of herbicides used, completed with active ingredient, WHO class, trademark, target, registration number and expiry date.</p> <table border="1" data-bbox="1131 475 1966 1378"> <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 AS 486</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>Becano SL 500</td> <td>indaziflam</td> <td>III</td> <td>wood</td> <td>RI.01030120124279</td> <td>02/05/2022</td> </tr> <tr> <td>Basta SL 150</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>Elang SL 480</td> <td>Isopropilamina glifosat 480 g/l</td> <td>U</td> <td>Grasses weed</td> <td>RI.01030119941170</td> <td>30/12/2021</td> </tr> <tr> <td>Kenlon EC 480</td> <td>Triklopir 480 g/l</td> <td>III</td> <td>Brush weed/ wood</td> <td>RI.01030120062433</td> <td>12/12/2021</td> </tr> <tr> <td>Metsulindo WP 20</td> <td>Metil metsulfuron 20%</td> <td>U</td> <td>Ferns, Broad Leaf, Sedges</td> <td>RI.01030119991484</td> <td>11/05/2021</td> </tr> <tr> <td>Garlon Mix 333/17</td> <td>Aminopiraliid potassium 17 g/l</td> <td>III</td> <td><i>Tetracera indica, Melastoma malabatricum, Clidemia hirta, Lantana camara</i></td> <td>RI.01030120155148</td> <td>31/01/2025</td> </tr> <tr> <td>Starane EC 290</td> <td>Fluroksipir 290 g/l</td> <td>U</td> <td>Broad leaf</td> <td>RI.0103011988854</td> <td>12/11/2023</td> </tr> </tbody> </table>	Trademark	Active Ingredient	WHO Class	Target	Registration Number	Expiry date	Smart AS 486	Isopropil amina glifosat 486 g/l	U	Grasses weed	RI.01030119971313	12/11/2023	Becano SL 500	indaziflam	III	wood	RI.01030120124279	02/05/2022	Basta SL 150	Amonium glufosinat 150 g/l	III	Grass weed, broad leaf	RI.01030119921113	12/11/2023	Elang SL 480	Isopropilamina glifosat 480 g/l	U	Grasses weed	RI.01030119941170	30/12/2021	Kenlon EC 480	Triklopir 480 g/l	III	Brush weed/ wood	RI.01030120062433	12/12/2021	Metsulindo WP 20	Metil metsulfuron 20%	U	Ferns, Broad Leaf, Sedges	RI.01030119991484	11/05/2021	Garlon Mix 333/17	Aminopiraliid potassium 17 g/l	III	<i>Tetracera indica, Melastoma malabatricum, Clidemia hirta, Lantana camara</i>	RI.01030120155148	31/01/2025	Starane EC 290	Fluroksipir 290 g/l	U	Broad leaf	RI.0103011988854	12/11/2023	Complied
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		Starthene 75 WDG	Acephate 75%	III	Bagworm, nettle caterpillar	RI.01010120072983	08/08/2022	
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		Thuricide WP	Bacillus thuringiensis 16,000 iu/mg	U	Bagworm, nettle caterpillar	RI.0101011977298	05/05/2022	
		Copton 0.5 RB	Hexaflumuron 0.5%	II	Termite ( <i>Coptotermes</i> )	RI.01010120144932	23/01/2024	
		Marshal 5 gr	Karbosulfan 5%	II	<i>Oryctes rhinoceros</i>	RI.01010119661279	06/10/2022	
		Regent 50 SC	Fipronil 50 g/L	II	Termite	RI.01010119951192	26/02/2023	

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7.2.2	<p><b>(C)</b> 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.</p>	<p>Document "Rekapitulasi Penggunaan Pestisida Tahun 2020" recorded pesticides use including active ingredients, LD50, area treated, amount of active ingredients applied per Ha and per ton FFB.</p> <p>Pesticide use in Bukit Maradja Estate in 2020:</p> <table border="1" data-bbox="1131 518 1697 1372"> <thead> <tr> <th>Trademark</th> <th>Volume</th> <th>UoM</th> </tr> </thead> <tbody> <tr><td>Basta 150 SL</td><td>50.00</td><td>liter</td></tr> <tr><td>Becano 500SC</td><td>41.60</td><td>liter</td></tr> <tr><td>Benstar 50 WP</td><td>2.00</td><td>kg</td></tr> <tr><td>Dipel SC</td><td>1.80</td><td>liter</td></tr> <tr><td>Dipel WG</td><td>26.20</td><td>liter</td></tr> <tr><td>Decis 2.5 EC</td><td>0.41</td><td>liter</td></tr> <tr><td>Elang 480 SL</td><td>2.10</td><td>liter</td></tr> <tr><td>Garlon Mix 333/17</td><td>416.40</td><td>liter</td></tr> <tr><td>Marathon 500 SL</td><td>105.80</td><td>liter</td></tr> <tr><td>Marshall 5 GR</td><td>1,307.30</td><td>kg</td></tr> <tr><td>Metsulindo 24 WP</td><td>169.43</td><td>kg</td></tr> <tr><td>Phosthene 97 WG</td><td>5,567.20</td><td>liter</td></tr> <tr><td>Regent 50 EC</td><td>0.70</td><td>liter</td></tr> <tr><td>Smart 486 AS</td><td>5,385.80</td><td>liter</td></tr> <tr><td>Starane 290 EC</td><td>157.90</td><td>liter</td></tr> <tr><td>Thuricide HP</td><td>570.30</td><td>liter</td></tr> <tr><td>Tikumin 0.0375 BB</td><td>212.70</td><td>kg</td></tr> </tbody> </table>	Trademark	Volume	UoM	Basta 150 SL	50.00	liter	Becano 500SC	41.60	liter	Benstar 50 WP	2.00	kg	Dipel SC	1.80	liter	Dipel WG	26.20	liter	Decis 2.5 EC	0.41	liter	Elang 480 SL	2.10	liter	Garlon Mix 333/17	416.40	liter	Marathon 500 SL	105.80	liter	Marshall 5 GR	1,307.30	kg	Metsulindo 24 WP	169.43	kg	Phosthene 97 WG	5,567.20	liter	Regent 50 EC	0.70	liter	Smart 486 AS	5,385.80	liter	Starane 290 EC	157.90	liter	Thuricide HP	570.30	liter	Tikumin 0.0375 BB	212.70	kg	Complied
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7.2.3	<b>(C)</b> Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.	Use of pesticide are minimized as part of the plan, and in accordance with IPM Plans, there are no pesticide application outside of the targeted species and planned intervals. Pesticide are only used to reduce/eliminate existing pest, which has exceeded the economic threshold.  Several increase of pesticide uses are occurred in Bukit Maradja Estate, e.g. Smart 486SL due to increase of uses in replanting area around 167.61 Ha and due to there is circle path program in young oil palm (2017) 245.55 Ha and OP 2018 for 80.55 Ha. Action plan to minimize uses of Smart 486SL has been determined, e.g.: a. Optimized weeding Mucuna at replanting area, circle racking at OP 2017 and OP 2018 prior to spraying. b. Conducted spraying according to dosage and concentration suggested by agronomist.  Optimizing pre-assessment that only 60% - 80% of weed controlled.	Complied
7.2.4	There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in Indonesia best practice guidelines.	There is no use of prophylactic use of pesticides throughout Bukit Maradja Estate, Kerasaan Estate and Timbang Deli Estate. Pesticide/Herbicides are only used to reduce/eliminate existing pest, which has exceeded the economic threshold.	Not Applicable
7.2.5	Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat, are not to be used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.  The due diligence refers to: 7.2.5a Judgment of the threat and verify why this is a major threat.	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 <i>paraquat</i> as contact pesticide is not allowed as of 1 January 2017. Target: Zero use of paraquat effective since 1 January 2017.  Based on visit in field operation and agrochemical storage in Bukit Maradja Estate, Kerasaan Estate and Timbang Deli Estate, there was no	Complied

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		paraquat found. Based on report of "Daftar Pestisida yang digunakan di Tahun 2020" – there were no paraquat noted in the report.	
	7.2.5b Why there is no other alternative which can be used.	There is 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 is 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 Process to limit the negative impacts of the application.	There is 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 is 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). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they conduct.	All Estate (Bukit Maradja Estate, Kerasaan Estate and Timbang Deli Estate) have provided basic training related to pesticide, understanding material safety data sheet/MSDS, limited pesticide training, emergency condition training and first aid training. Chemical warehouse and its infrastructure is ready (see criterion 4.6.6). Standard PPE for sprayer: goggle, masker, apron, rubber glove, rubber boot. Standard PPE for chemical mixer/chemical storekeeper: faceshield, masker, apron, rubber glove, safety boot. Record of training for person who handling pesticides, such as:	Complied

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		<ul style="list-style-type: none"> <li>- Attendance list of "Pelatihan Kaliberasi Sprayer dan Perawatan Alat kerja" dated 11<sup>th</sup> January 2021, location in Mixing Area Bukit Maradja Estate, was attended by 18 workers.</li> <li>- Attendance list of "Training Pencampuran Pestisida", dated 2<sup>nd</sup> March 2020, location in Go-Down Kerasaan Estate, was attended by 7 workers.</li> </ul> <p>After March 2020 up to December 2020, no training provided due to COVID-19 pandemic.</p>	
7.2.7	<b>(C)</b> Storage of all pesticides in accordance with recognized best practices.	<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>Auditor team has visited the location where the temporary storage of hazardous and toxic waste. The conditions for the hazardous waste warehouse are in accordance with the permits and the requirements stated in the Decree of the Head of Bapedal No.Kep-01/Bapedal/09/1995.</p> <p>The company 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</p>	Complied

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		<p>risk of cross contamination with family members is reduced and eliminated.</p>	
<p>7.2.8</p>	<p>All pesticide containers that are disposed of and/or used for other purposes are managed according to applicable regulations and/or instructions on the packaging.</p>	<p>All pesticide and agrochemical containers that produced from Estate and Mill are disposed and store at registered hazardous and toxic substances waste temporary storage (TPS LB3) which located at Bukit Maradja POM. Permit of hazardous and toxic substances waste temporary storage (TPS LB3) Bukit Maradja POM as referred number Nomor: 503/01/17.4/2021, dated 21 January 2021. Source of waste covering Bukit Maradja Pom and Bukit Maradja Estate.</p> <p>Permit of hazardous and toxic substances waste temporary storage (TPS LB3) Kerasaan Estate as referred number Nomor: 503/29/17.4/2020, dated 30 July 2020. Source of waste covering Kerasaan Estate.</p> <p>PT Eastern Sumatra Indonesia has an agreement with hazardous and toxic substances waste company PT Amindy Barokah Sumatera</p> <p><b>Bukit Maradja Estate:</b> waste handover to Bukit Maradja Mill.</p> <ul style="list-style-type: none"> <li>- Letter No. 25/SP/CWS-BME/I/2021, dated 5 Jan 2021. 50L lubricant; 8 Oil filter used.</li> <li>- Letter No. 02/SP/CWS-BME/I/2021, dated 18 Jan 2021. 80L lubricant used; 5 pcs oil filter used.</li> <li>- Letter No. 02/SP/CWS-BME/II/2021, dated 1 Feb 2021. 60L lubricant used; 3 pcs oil filter used.</li> <li>- Letter No. 03/SP/CWS-BME/II/2021, dated 15 Feb 2021. 50L lubricant used; 6 pcs oil filter used.</li> <li>- Letter No. 03/SP/CWS-BME/II/2021, dated 27 Feb 2021. 70L lubricant used; 2 pcs oil filter used.</li> </ul> <p><b>Kerasaan Estate:</b></p> <p>Hazardous Waste and Toxic Material Wastes already transported on 4 February 2021 as per Transport Manifest as below:</p>	<p>Complied</p>

		<ol style="list-style-type: none"> <li>1. No. Manifest: AVT 0019217. Waste type: Used Oil Filter (B109d). Volume = 43 kg.</li> <li>2. No. Manifest: AVT 0019457. Waste type: Used Battery (A102d). Volume = 44 kg.</li> <li>3. No. Manifest: AVT 0019209. Waste Type: Medical waste (A337-1). Volume = 10 kg.</li> <li>4. No. Manifest: AVT 0019458. Waste Type: Contaminated Container (B104d). Volume = 99,5 kg.</li> </ol> <p><b>Timbang Deli Estate:</b>  Hazardous Waste and Toxic Material Wastes already transported on 8 Maret 2021 as per Transport Manifest as below:</p> <ol style="list-style-type: none"> <li>1. No. Manifest: AVT 0019903. Waste type: Used Lubricant (B105d). Volume = 97.24 L.</li> <li>2. No. Manifest: AVT 0019904. Waste type: Oil Filter (B109d). Volume = 0.9 kg.</li> <li>3. No. Manifest: AVT 0019905. Waste Type: Contaminated cotton (B110d). Volume = 30 kg.</li> <li>4. No. Manifest: AVT 0019907. Waste Type: Contaminated Container (B104d). Volume = 10 kg.</li> <li>5. No. Manifest: AVT 0019908. Waste Type: Laboratory Waste (A106d). Volume = 1,342.4 L.</li> <li>6. No. Manifest: AVT 0019909. Waste Type: Laboratory Waste (A106d). Volume = 150 kg.</li> <li>7. No. Manifest: AVT 0019910. Waste Type: Medical waste (A337-1). Volume = 3 kg.</li> </ol>	
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</p>	<p>Unit of Certification applying pesticides through manual by persons/sprayer. Therefore, no aerial spraying is available.  Not applicable</p>	<p>Not Applicable</p>

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	provided to affected local communities at least 48 hours prior to application of aerial spraying.		
7.2.10	<b>(C)</b> Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.	<p>Bukit Maradja Estate:            Specific annual medical surveillance conducted on 17 Dec 2020 with total 73 workers (manuring, spraying, pest &amp; disease, warehouse, workshop, etc. Total spraying operator that already tested/examined is 16 sprayers.</p> <p>Bukit Maradja POM:            Specific annual medical surveillance conducted on 23 Sep 2020 with total 8 workers (kernel plant, warehouse, WTP, hazardous waste storekeeper).</p>	Complied
7.2.11	<b>(C)</b> No pesticide-related work is carried out by pregnant or breastfeeding women, or people with medical limitations and they are offered other equivalent work alternatives.	<p>PT Eastern Sumatra 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>Based on interview with 8 spraying operators at Block 17C05 Division 3 Bukit Maradja Estate, known that 4 female sprayers not in pregnant or breastfeeding condition. Those female sprayers already understand the risk of pesticide application.</p>	Complied
<b>Criteria 7.3:</b> Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.			
7.3.1	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented in accordance with applicable laws and regulations.	<p>All pesticide and agrochemical containers that produced from Estate and Mill are disposed and store at registered hazardous and toxic substances waste temporary storage (TPS LB3) which located at Bukit Maradja POM.</p> <p>Permit of hazardous and toxic substances waste temporary storage (TPS LB3) Bukit Maradja POM as referred number Nomor: 503/01/17.4/2021, dated 21 January 2021. Source of waste covering Bukit Maradja Pom and Bukit Maradja Estate.</p>	Complied

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		<p>Permit of hazardous and toxic substances waste temporary storage (TPS LB3) Kerasaan Estate as referred number Nomor: 503/29/17.4/2020, dated 30 July 2020. Source of waste covering Kerasaan Estate.</p> <p>PT Eastern Sumatra Indonesia has an agreement with hazardous and toxic substances waste company PT Amindy Barokah Sumatera</p> <p><b>Bukit Maradja Estate:</b> waste handover to Bukit Maradja Mill.</p> <ul style="list-style-type: none"> <li>- Letter No. 25/SP/CWS-BME/I/2021, dated 5 Jan 2021. 50L lubricant; 8 Oil filter used.</li> <li>- Letter No. 02/SP/CWS-BME/I/2021, dated 18 Jan 2021. 80L lubricant used; 5 pcs oil filter used.</li> <li>- Letter No. 02/SP/CWS-BME/II/2021, dated 1 Feb 2021. 60L lubricant used; 3 pcs oil filter used.</li> <li>- Letter No. 03/SP/CWS-BME/II/2021, dated 15 Feb 2021. 50L lubricant used; 6 pcs oil filter used.</li> <li>- Letter No. 03/SP/CWS-BME/II/2021, dated 27 Feb 2021. 70L lubricant used; 2 pcs oil filter used.</li> </ul> <p><b>Kerasaan Estate:</b></p> <p>Hazardous Waste and Toxic Material Wastes already transported on 4 February 2021 as per Transport Manifest as below:</p> <ol style="list-style-type: none"> <li>1. No. Manifest: AVT 0019217. Waste type: Used Oil Filter (B109d). Volume = 43 kg.</li> <li>2. No. Manifest: AVT 0019457. Waste type: Used Battery (A102d). Volume = 44 kg.</li> <li>3. No. Manifest: AVT 0019209. Waste Type: Medical waste (A337-1). Volume = 10 kg.</li> <li>4. No. Manifest: AVT 0019458. Waste Type: Contaminated Container (B104d). Volume = 99,5 kg.</li> </ol>	
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7.3.2	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.	<p>Domestic waste from workers compound at Estate level are disposed in landfill and located in specific Block. Type of waste is only for inorganic waste, mostly plastic waste. Besides, the organic wastes are buried at the backyard of worker's compound.</p> <p>Unit of certification also complied with regulation regarding on Domestic Wastewater Management Installation.</p> <p>Based on field visit at worker's compound Division 2 Bukit Maradja Estate and Central Compound Kerasaan Estate, the domestic wastewater management already installed in accordance with its permit.</p>	Complied
7.3.3	The unit of certification does not use open fire for waste disposal.	<p>Domestic waste from workers compound at Estate level are disposed in landfill and located in specific Block. Type of waste is only for inorganic waste, mostly plastic waste. Besides, the organic wastes are buried at the backyard of worker's compound.</p> <p>Unit of certification also complied with regulation regarding on Domestic Wastewater Management Installation.</p> <p>Based on field visit at worker's compound Division 2 Bukit Maradja Estate and Central Compound Kerasaan Estate, the domestic wastewater management already installed in accordance with its permit.</p>	Complied
<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.			
7.4.1	Good agricultural practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts is documented.	<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> <ol style="list-style-type: none"> <li>1. OPM-06-01; Inorganic Fertiliser.</li> <li>2. OPM-06-02; Organic Fertiliser.</li> <li>3. OPM-06-03; Leaf Sampling Unit (LSU): Palm Marking.</li> <li>4. OPM-06-04; Leaf Sampling Unit (LSU) and Rachis Sampling Unit (RSU) sample taking.</li> </ol>	Complied

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		<p>Fertilizer are applied to maintain and increase soil fertility, fertilizer applied following the fertilizer recommendation which established based on soil and leaf analysis. Due to Covid-19 pandemic, leaf analysis 2020 postponed to 2021, therefore fertilizer recommendation for 2021 is according to fertilizer recommendation 2020. Available "Oil Palm Fertilizer Recommendation for PT Eastern Sumatra Indonesia – Bukit Maradja Estate 2020", "Oil Palm Fertilizer Recommendation for PT Kerasaan Indonesia – Kerasaan Estate 2020" and "Oil Palm Fertilizer Recommendation for PT Timbang Deli Indonesia – Timbang Deli Estate 2020". Fertilizer application records are documented in "Monthly Manuring Program Sheet".</p> <p>Field visit conducted to fertilizer application activity at Block 14C21 Division 2 Bukit Maradja Estate. Type of fertilizer is Urea dosage 0.75 kg/palms. Fertilizer weighing 0.75 kg in a plastic bag is distributed into each oil palms, then the applicator applied it on the circle. Based on interview, fertilizer applications are performed according to the SOP that refer Best Agriculture Practice and minimize the environmental impacts. By using methods correct type, correct target, and correct dosage. Application near the drainage are avoided.</p> <p>Field visit conducted to fertilizer application activity at Block 14H09A Division 2 Kerasaan Estate. Type of fertilizer is MOP dosage 0.75 kg/palms. Workers contains 8 applicator and 4 distributors. Fertilizer weighing 0.75 kg in a plastic bag is distributed into each oil palms, then the applicator applied it on the circle. Based on interview, fertilizer applications are performed according to the SOP that refer Best Agriculture Practice and minimize the environmental impacts. By using methods correct type, correct target, and correct dosage. Application near the drainage are avoided.</p>	
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<p>7.4.2</p>	<p>Analysis of tissue samples (e.g. leaves) and soil on a regular basis to monitor and manage changes in soil fertility and plant health is documented.</p>	<p>Last periodical leaf sample analysis in Bukit Maradja Estate conducted in December 2019 for preparing fertilizer recommendation 2020. Leaf and Rachis Analysis Report 2019 and fertilizer recommendation 2020 were evident. Leaf Analysis Report was issued by Verdant Bioscience Plant and Soil Nutrition Laboratory dated 21 Feb 2020. Sample seen Lab No. B5292; Sample type-Leaf; Estate: BME; Division: II; Block 05C16-17A; Sampling date: 20/12/2019; Material PM01; Plant Year 2005; 46.81 Ha; Analysis Result: 2.68% N; 0.158% P; 0.89% K; 0.23% Mg; 0.56% Ca; 15 ppm B; 3 ppm Cu; and 17 ppm Zn. Sample seen Lab No. B5295; Sample type-Rachis; Estate-BME; Division: II; Block 10A05-10A06A; Sampling date 19/12/2019; Material PM02; Planting Year 2010; 50.13 Ha; Analysis Result: 0.37% N; 0.204% P; 2.35% K; 0.12% Mg and 0.61% Ca.</p> <p>Soil analysis evident in Report of Testing, e.g. No. 0090-0091/MDN-AGRI/VIII/19, date of test 10/06/2019-27/06/2019. Sample Code 0-20 cm; Organic material: 3.67% C; 0.39% N; &lt;0.001% oil &amp; fat; pH H<sub>2</sub>O 6.7; C/N 9.41; 18.48 ppm P Bray; 0.51 Ca; 0.49 Mg; 0.34 K; 0.41 Na; 17.42 (in cmol(+)/kg); 10.05% BS; &lt;0.001 ppm Pb; &lt;0.001 ppm Cd; 0.39 ppm Cu; 0.24 ppm Zn; 25.6% sand; 35.8% silt and 38.6% clay.</p> <p>The last periodical leaf sample analysis in Kerasaan Estate conducted in July 2019 for preparing fertilizer recommendation 2020. Leaf and Rachis Analysis Report 2020 and fertilizer recommendation 2020 were evident. Leaf Analysis Report was issued by Verdant Plant and Soil Nutrition Laboratory with Ref number 10/STC-spl/VII/19, received date 11 Jul 2019, number of samples 4 bags, analysis date 25 Jul 2019, document number PSNL/TTI/VII/19/270. Sample seen Lab No.B1425; Sample type-Leaf; Estate-KRE; Div-II; Block 07J08A; Sampling date 11/06/2019; Material SJ; Plant Year 2007; 19.3 Ha. Analysis result: 2.55% N; 0.158% P; 0.95% K; 0.25% Mg; 0.56% Ca; 9 ppm B; 4 ppm Cu and 18 ppm Zn. Sample seen Lab No.B1428; Sample type-Rachis; Estate-KRE; Div-II; Block 12H01, H02; Sampling date 11/06/2019;</p>	<p>Complied</p>
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		<p>Material BLRS; Plant Year 2012; 39.8 Ha. Analysis result: 0.34% N; 0.158% P; 2.39% Mg; and 0.20% Ca.</p> <p>The last periodical leaf sample analysis in Timbang Deli Estate conducted in December 2020. Leaf and Rachis Analysis Report 2020 and fertilizer recommendation 2021 were evident. Leaf Analysis Report was issued by Verdant Plant and Soil Nutrition Laboratory with Ref number 45103A5120, samples received on 4 April 2020, number of samples 20 samples consist of 10 leaf and 10 rachis samples. Sample seen Lab No.C6228; Analysis date 10-11 December 2020; Sample type-Leaf; Estate-TDE; Block 15B04; Analysis result: 2.36% N; 0.139% P; 0.73% K; 0.24% Mg; 0.53% Ca; 16 ppm B; 3 ppm Cu and 12 ppm Zn. Sample seen Lab No.C6245; Sample type-Rachis; Estate-TDE; Block 17D01; Analysis date 10-11 December 2020; Analysis result: 0.102% P; 1.71% K; 0.14% Mg and 0.32% Ca.</p> <p>Due to Covid-19 pandemic, there are no leaf or soil analysis being performed in Bukit Maradja Estate and Kerasaan Estate in 2020. Fertilizer recommendation 2021 is following fertilizer recommendation 2020.</p>																	
7.4.3	<p>A nutrient recycling strategy is in place, which include the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.</p>	<p>Permit of POME for land application as per "Persetujuan Pemenuhan Komitmen Izin Pembuangan Air Limbah Secara Aplikasi ke Tanah Kepada PT Eastern Sumatra Indonesia" No.503/08/17.4/2021 dated 29 January 2021, issued by "Dinas Penanaman Modal dan Pelayanan Perizinan Terpadu Satu Pintu", valid for 5 years. The unit of certification processed EFB and POME into compost.</p> <p>Compost are applied in Bukit Maradja Estate, recorded in "Aplikasi Compost ke Lapangan". Detail application record of composting period January – December 2020 are as follows:</p> <table border="1" data-bbox="1133 1286 1951 1375"> <thead> <tr> <th rowspan="2">Month</th> <th rowspan="2">Trip</th> <th colspan="2">Mature Area</th> <th colspan="2">Immature</th> </tr> <tr> <th>Tons</th> <th>Ha</th> <th>Tons</th> <th>Ha</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Month	Trip	Mature Area		Immature		Tons	Ha	Tons	Ha							Complied
Month	Trip	Mature Area			Immature														
		Tons	Ha	Tons	Ha														

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		January	170	1,279.89	84.82	193.66	44.07	
		February	208	1,869.32	121.45	-	-	
		March	210	1,450.53	105.00	221.73	43.66	
		April	227	1,785.60	118.25	36.87	8.00	
		May	228	1,874.04	121.70	-	-	
		June	345	2,725.62	183.34	-	-	
		July	334	2,545.21	175.00	-	-	
		August	251	1,755.96	121.09	-	-	
		September	259	1,866.79	121.19	-	-	
		October	241	1,674.81	108.05	-	-	
		November	206	1,355.52	86.02	-	-	
		December	248	1,443.36	92.94	-	-	
		Total	2,927	21,626.65	1,438.41	452.26	95.73	

In January 2021 composting applied 1,364.74 tons for 89.80 Ha using 227 trips of tractor. Dosage of compost for mature is 15 ton/Ha and for immature is 5 ton/Ha.

Bukit Maradja Estate applied POME residue from composting process into the field, based on record in January 2021 applied 1,633 m3 of POME and in February applied 745 m3. POME land application are controlled by Bukit Maradja POM.

There is no application of EFB, POME or Composting in Timbang Deli Estate or Kerasaan Estate due to long distance from Bukit Maradja POM.

7.4.4	Records of fertilizer inputs are maintained.	<p>Fertilizer recommendation 2020 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 2020" for estate recapitulation. Fertilizer recommendation 2020 for each Estate were also available.</p> <p>Record of fertilizer input in Bukit Maradja Estate in 2020 are as follow:</p> <table border="1" data-bbox="1131 579 1637 1300"> <thead> <tr> <th>Fertilizer Type</th> <th>Volume of Application (kg)</th> </tr> </thead> <tbody> <tr> <td>Borate</td> <td>21.330</td> </tr> <tr> <td>Dolomite</td> <td>98.050</td> </tr> <tr> <td>Kieserite</td> <td>206.850</td> </tr> <tr> <td>MOP</td> <td>443.500</td> </tr> <tr> <td>NPK 12:12:17:2</td> <td>-</td> </tr> <tr> <td>NPK 15:15:6:4</td> <td>261</td> </tr> <tr> <td>Rhizoplex</td> <td>100</td> </tr> <tr> <td>RP</td> <td>434.163</td> </tr> <tr> <td>SA/ZA</td> <td>219</td> </tr> <tr> <td>TSP</td> <td>79.500</td> </tr> <tr> <td>Urea</td> <td>539.325</td> </tr> <tr> <td>Excalibur Gold</td> <td>56</td> </tr> </tbody> </table> <p>Record of fertilizer input in Kerasaan Estate in 2020 are as follow:</p>	Fertilizer Type	Volume of Application (kg)	Borate	21.330	Dolomite	98.050	Kieserite	206.850	MOP	443.500	NPK 12:12:17:2	-	NPK 15:15:6:4	261	Rhizoplex	100	RP	434.163	SA/ZA	219	TSP	79.500	Urea	539.325	Excalibur Gold	56	Complied
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Fertilizer Type	Volume of Application (kg)
Borate	41,700
Dolomite	132,400
Kieserite	206,350
MOP	482,350
RP	577,425
Urea	532,811

Record of fertilizer input in Timbang Deli Estate in 2020 are as follow:

Fertilizer Type	Volume of Application (kg)	
	Mature	Immature
Borate	4,928	2,056
CuSO <sub>4</sub>	3,087	241
Dolomite	9,179	-
Kieserite	38,803	21,616
MOP	81,663	31,826
TSP	-	24,015
RP	83,243	11,798
Urea	89,381	32,667

		ZnSO <sub>4</sub>	1,719	223	
<b>Criteria 7.5:</b> Practices minimise and control erosion and degradation of soils.					
7.5.1	<b>(C)</b> Maps that identify marginal and fragile soils, including steep sloped land are available.	<p>PT Eastern Sumatra Indonesia (Bukit Maradja Estate and Bukit Maradja POM) - 1961; PT Kerasaan Indonesia (Kerasaan Estate) - 1962 and PT Timbang Deli Indonesia (Timbang Deli Estate) is an existing oil palm plantation company since Dutch Era 1921 and acquisition in 1961/1962 by Indonesia government. As unit of certification, the company have no plan for new development.</p> <p>Based on soil survey that carried out in 2009 by JH Agriculture, no marginal and fragile soil, include peat and steep area that was identified within Bukit Maradja Estate, Kerasaan Estate and Timbang Deli Estate. Peta Blok dengan Topografi, 21 Jan 2010. Slope maximum 1%.</p>			Complied
7.5.2	The replanting of palm oil is not conducted extensively on steep terrain in accordance with applicable regulations.	<p>PT Eastern Sumatra Indonesia (Bukit Maradja Estate and Bukit Maradja POM) - 1961; PT Kerasaan Indonesia (Kerasaan Estate) - 1962 and PT Timbang Deli Indonesia (Timbang Deli Estate) is an existing oil palm plantation company since Dutch Era 1921 and acquisition in 1961/1962 by Indonesia government. As unit of certification, the company have no plan for new development.</p> <p>Based on soil survey that carried out in 2009 by JH Agriculture, no marginal and fragile soil, include peat and steep area that was identified within Bukit Maradja Estate, Kerasaan Estate and Timbang Deli Estate.</p>			Complied
7.5.3	New palm oil planting is not conducted on steep terrain in accordance with applicable regulations.	<p>PT Eastern Sumatra Indonesia (Bukit Maradja Estate and Bukit Maradja POM) - 1961; PT Kerasaan Indonesia (Kerasaan Estate) - 1962 and PT Timbang Deli Indonesia (Timbang Deli Estate) is an existing oil palm plantation company since Dutch Era 1921 and acquisition in 1961/1962 by Indonesia government. As unit of certification, the company have no plan for new development.</p>			Complied



		Based on soil survey that carried out in 2009 by JH Agriculture, no marginal and fragile soil, include peat and steep area that was identified within Bukit Maradja Estate, Kerasaan Estate and Timbang Deli Estate.	
<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> Evidence of long-term land suitability for oil palm cultivation, soil maps or soil surveys that identify marginal and fragile soils, including steep terrain are available, in planning and operations.	PT Eastern Sumatra Indonesia (Bukit Maradja Estate and Bukit Maradja POM) - 1961; PT Kerasaan Indonesia (Kerasaan Estate) - 1962 and PT Timbang Deli Indonesia (Timbang Deli Estate) is an existing oil palm plantation company since Dutch Era 1921 and acquisition in 1961/1962 by Indonesia government. As unit of certification, the company have no plan for new development. Based on soil survey that carried out in 2009 by JH Agriculture, no marginal and fragile soil, include peat and steep area that was identified within Bukit Maradja Estate, Kerasaan Estate and Timbang Deli Estate.	Complied
7.6.2	Extensive planting on marginal and fragile soils is avoided or, if necessary, carried out according to the best-practice soil management plan.	PT Eastern Sumatra Indonesia (Bukit Maradja Estate and Bukit Maradja POM) - 1961; PT Kerasaan Indonesia (Kerasaan Estate) - 1962 and PT Timbang Deli Indonesia (Timbang Deli Estate) is an existing oil palm plantation company since Dutch Era 1921 and acquisition in 1961/1962 by Indonesia government. As unit of certification, the company have no plan for new development. Based on soil survey that carried out in 2009 by JH Agriculture, no marginal and fragile soil, include peat and steep area that was identified within Bukit Maradja Estate, Kerasaan Estate and Timbang Deli Estate.	Complied
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	PT Eastern Sumatra Indonesia (Bukit Maradja Estate and Bukit Maradja POM) - 1961; PT Kerasaan Indonesia (Kerasaan Estate) - 1962 and PT Timbang Deli Indonesia (Timbang Deli Estate) is an existing oil palm plantation company since Dutch Era 1921 and acquisition in 1961/1962 by Indonesia government. As unit of certification, the company have no plan for new development. Based on soil survey that carried out in 2009 by JH Agriculture, no marginal and fragile soil, include peat and steep	Complied

		<p>area that was identified within Bukit Maradja Estate, Kerasaan Estate and Timbang Deli Estate.</p> <p>Periodical soil surveys aims to calculate the soil fertility and soil nutrition necessity, which will use for manuring recommendation. Planning of drainage, irrigation systems, roads and other infrastructure are covered within Environmental Assessment or AMDAL/UKL-UPL in part of Pre-Development activities.</p>	
<p><b>Criteria 7.7:</b> No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.</p>			
7.7.1	<p><b>(C)</b> No new planting on peatlands, regardless of depth, after 15 November 2018, in existing plantation areas, as well as in new development areas.</p>	<p>PT Eastern Sumatra Indonesia (Bukit Maradja Estate and Bukit Maradja POM) - 1961; PT Kerasaan Indonesia (Kerasaan Estate) - 1962 and PT Timbang Deli Indonesia (Timbang Deli Estate) is an existing oil palm plantation company since Dutch Era 1921 and acquisition in 1961/1962 by Indonesia government. As unit of certification, the company have no plan for new development. Based on soil survey that carried out in 2009 by JH Agriculture, no marginal and fragile soil, include peat and steep area that was identified within Bukit Maradja Estate, Kerasaan Estate and Timbang Deli Estate.</p>	Complied
7.7.2	<p>Peat areas within the managed area are inventoried, documented and reported to the RSPO Secretariat (effective from November 15, 2018).</p>	<p>PT Eastern Sumatra Indonesia (Bukit Maradja Estate and Bukit Maradja POM) - 1961; PT Kerasaan Indonesia (Kerasaan Estate) - 1962 and PT Timbang Deli Indonesia (Timbang Deli Estate) is an existing oil palm plantation company since Dutch Era 1921 and acquisition in 1961/1962 by Indonesia government. As unit of certification, the company have no plan for new development. Based on soil survey that carried out in 2009 by JH Agriculture, no marginal and fragile soil, include peat and steep area that was identified within Bukit Maradja Estate, Kerasaan Estate and Timbang Deli Estate.</p>	Not Applicable
7.7.3	<p><b>(C)</b> Subsidence of peat is monitored, documented and minimised.</p>	<p>PT Eastern Sumatra Indonesia (Bukit Maradja Estate and Bukit Maradja POM) - 1961; PT Kerasaan Indonesia (Kerasaan Estate) - 1962 and PT Timbang Deli Indonesia (Timbang Deli Estate) is an existing oil palm</p>	Not Applicable

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		plantation company since Dutch Era 1921 and acquisition in 1961/1962 by Indonesia government. As unit of certification, the company have no plan for new development. Based on soil survey that carried out in 2009 by JH Agriculture, no marginal and fragile soil, include peat and steep area that was identified within Bukit Maradja Estate, Kerasaan Estate and Timbang Deli Estate.	
7.7.4	<b>(C)</b> Availability of implementation evidence of the water and land cover management program.	PT Eastern Sumatra Indonesia (Bukit Maradja Estate and Bukit Maradja POM) - 1961; PT Kerasaan Indonesia (Kerasaan Estate) - 1962 and PT Timbang Deli Indonesia (Timbang Deli Estate) is an existing oil palm plantation company since Dutch Era 1921 and acquisition in 1961/1962 by Indonesia government. As unit of certification, the company have no plan for new development. Based on soil survey that carried out in 2009 by JH Agriculture, no marginal and fragile soil, include peat and steep area that was identified within Bukit Maradja Estate, Kerasaan Estate and Timbang Deli Estate.	Not Applicable
7.7.5	<b>(C)</b> Drainability assessments are conducted for plantations planted on peat following the RSPO Drainability Assessment Procedure, or other method recognized by RSPO, (at least five years or in accordance with the provisions of the RSPO Drainability Assessment Procedure) before replanting. The results of the assessment are used to determine the period of replanting to be carried out, as well as to gradually replace oil palm cultivation for at least 40 years or two cycles, (whichever is longer), before reaching the natural gravitational drainage limit for peat. If oil palm is gradually replaced, it is replaced by other commodity crops that are better suited for higher groundwater levels (paludiculture) or rehabilitated with natural vegetation.	PT Eastern Sumatra Indonesia (Bukit Maradja Estate and Bukit Maradja POM) - 1961; PT Kerasaan Indonesia (Kerasaan Estate) - 1962 and PT Timbang Deli Indonesia (Timbang Deli Estate) is an existing oil palm plantation company since Dutch Era 1921 and acquisition in 1961/1962 by Indonesia government. As unit of certification, the company have no plan for new development. Based on soil survey that carried out in 2009 by JH Agriculture, no marginal and fragile soil, include peat and steep area that was identified within Bukit Maradja Estate, Kerasaan Estate and Timbang Deli Estate.	Not Applicable
7.7.6	<b>(C)</b> All existing plantations on peat are managed according to applicable laws and/or "RSPO Guidelines for Best Management Practices (BMP) for Oil Palm Cultivation that are already on Peatlands", version 3 (June 2019) along with related audit guidelines (May 2019).	PT Eastern Sumatra Indonesia (Bukit Maradja Estate and Bukit Maradja POM) - 1961; PT Kerasaan Indonesia (Kerasaan Estate) - 1962 and PT Timbang Deli Indonesia (Timbang Deli Estate) is an existing oil palm plantation company since Dutch Era 1921 and acquisition in 1961/1962	Not Applicable

		by Indonesia government. As unit of certification, the company have no plan for new development. Based on soil survey that carried out in 2009 by JH Agriculture, no marginal and fragile soil, include peat and steep area that was identified within Bukit Maradja Estate, Kerasaan Estate and Timbang Deli Estate.	
7.7.7	<b>(C)</b> All peat areas not planted and reserved in managed areas (regardless of depth) are protected as 'peatland conservation areas'; unit of certification are prohibited from constructing drainage channels, building roads and new electricity lines on peatlands; unless if it is for a non-corporate land clearance. Peatlands are managed in accordance with 'RSPO Best Management Practices for the Management and Rehabilitation of Natural Vegetation related to Oil Palm Cultivation that already exists in Peatlands' (the latest version) along with relevant audit guidelines.	PT Eastern Sumatra Indonesia (Bukit Maradja Estate and Bukit Maradja POM) - 1961; PT Kerasaan Indonesia (Kerasaan Estate) - 1962 and PT Timbang Deli Indonesia (Timbang Deli Estate) is an existing oil palm plantation company since Dutch Era 1921 and acquisition in 1961/1962 by Indonesia government. As unit of certification, the company have no plan for new development. Based on soil survey that carried out in 2009 by JH Agriculture, no marginal and fragile soil, include peat and steep area that was identified within Bukit Maradja Estate, Kerasaan Estate and Timbang Deli Estate.	Not Applicable
<b>Criteria 7.8:</b> Practices maintain the quality and availability of surface and groundwater.			
7.8.1	A water management plan is available and is implemented to support efficient use of water sources and continuous availability and avoid negative impacts on other users in the catchment. The plan referred to contains the following matters: 7.8.1a The unit of certification does not limit access to clean water or does not pollute the water used by the community.	Bukit Maradja Estate, Kerasaan Estate and Timbang Deli Estate has prepared water management plan under "Program Pengelolaan Air" issued on 4 January 2021. The program consists 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. 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 watercourse by conduct mixing of pesticide in the mixing area only.  Water management plan available in document "Water Management Plan & Praktek Meminimalisir Pengendalian Erosi dan Degradasi Tanah 2021", such as: - Efficient of water usage in mill and estate, included water usage for	Complied

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		<p>FFB process.</p> <ul style="list-style-type: none"> <li>- Install the platform on hill.</li> <li>- Individual terrace.</li> <li>- Prevent contamination in river water: planting vetiver grass, install dam, upkeep "Bronjong".</li> <li>- Maintain water level and piezometer in peat areas.</li> <li>- Planting legume cover crops such as <i>Mucuna bracteata</i>.</li> </ul>																									
7.8.2	<p>7.8.1b Workers have adequate access to clean water.</p> <p><b>(C)</b> Water courses and wetlands are protected, including the maintenance and restoration of riparian zones and other buffer zones during or before replanting, in accordance with the "RSPO Manual on BMPs for the management and rehabilitation of riparian reserves" (April 2017) or Simplified Guide Management and Rehabilitation of Riparian Reserves (2018).</p>	<p>The unit of certification is located near the public settlements and is close to the main road. Then, employees consume drinking water by buying ready-to-use bottled water because they consider it more practical. Even, the company also provide an accessible clean water.</p> <p>Unit of Certification has developed a Water Management Plan, last updated in January 2021. In example, Bukit Maradja Estate 2021 has five programs, namely the washing water tank which was held on 5 January 2021; Groundwater analysis (ABT); Surface Water analysis (APU); socialization on the use of clean water and reservoir cleaning.</p> <p>The Groundwater Permit has been in accordance with the Decree of the Governor of North Sumatra Number: No.546.2/947/DIS.PM.PPTSP/6/X.3.f/V/2018, dated 24 May 2018 (valid until 23 May 2021). Max allowable discharge: 5 Litre / second.</p>	Complied																								
7.8.3	<p>Mill effluent is managed according to applicable regulations. The quality of mill effluent discharged, especially BOD (Biochemical Oxygen Demand) is monitored in accordance with applicable regulations.</p>	<p>Effluent Wastewater Analysis Result Bukit Maradja POM 2020:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th rowspan="2">Month</th> <th colspan="2">BOD (mg/L)</th> <th rowspan="2">COD (mg/L)</th> <th rowspan="2">Oil &amp; Grease (mg/L)</th> <th rowspan="2">pH</th> </tr> <tr> <th>Result</th> <th>Threshold</th> </tr> </thead> <tbody> <tr> <td>Jan</td> <td>968</td> <td rowspan="3">5,000</td> <td>1,581</td> <td>&lt; 5.0</td> <td>8.10</td> </tr> <tr> <td>Feb</td> <td>992</td> <td>1,621</td> <td>1.83</td> <td>7.79</td> </tr> <tr> <td>Mar</td> <td>2,011</td> <td>3,640</td> <td>1.36</td> <td>8.70</td> </tr> </tbody> </table>	Month	BOD (mg/L)		COD (mg/L)	Oil & Grease (mg/L)	pH	Result	Threshold	Jan	968	5,000	1,581	< 5.0	8.10	Feb	992	1,621	1.83	7.79	Mar	2,011	3,640	1.36	8.70	Complied
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7.8.4	Mill water use per tonne of FFB is monitored and recorded.	According to monitoring of water use database Bukit Maradja Mill period 2019 and 2020 as below:	Complied																																																						

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<p><b>Criteria 7.9:</b> Efficiency of fossil fuel use and the use of renewable energy is optimised</p>																																																							
<p>7.9.1</p>	<p>Plans to increase the efficiency of fossil fuel use and to optimize renewable energy are available, monitored and documented</p>	<p>Unit of certification has prepared a strategy in effort to reduce and mitigate pollution and emission. Monitoring of pollution and emission quality for plantation has been planned and implemented, e.g. air quality ambient for boiler and power generator, water quality test for surface and ground water, effluent water quality, noise level, etc. The monitoring result is incorporated in RKL/RPL (environmental management and monitoring plan) and reported regularly to the government. In Mukomuko POM, all emission are monitored.</p>	<p>Complied</p>																																																				
<p><b>Criteria 7.10:</b> 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>																																																							

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7.10.1	<p><b>(C)</b> GHG emissions for the unit of certification are identified and assessed. Plans to reduce or minimize GHG emissions are implemented, monitored through the PalmGHG calculator, and reported publicly.</p>	<p>PT Eastern Sumatera Indonesia – Bukit Maradja 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 2020 and provided in attachment Bukit Maradja 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" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 33%;">Stages/Activity type</th> <th style="width: 33%;">Mitigation Plan</th> <th style="width: 33%;">Implementation</th> </tr> </thead> <tbody> <tr> <td style="height: 20px;"> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Stages/Activity type	Mitigation Plan	Implementation				Complied
Stages/Activity type	Mitigation Plan	Implementation							



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		<p>Fertilizer application</p>	<p>Effective fertilizer application as per recommendation</p> <p>No fertilizer application in rainy season</p> <p>No fertilizer application on river buffer zone/riparian area</p> <p>Socialization to all level of worker on GHG mitigation plan related to impact of fertilizer application</p>	<ul style="list-style-type: none"> <li>• Leaf sampling analysis for accurate fertilizer recommendation</li> <li>• Implement SOP fertilizer application</li> </ul>	
		<p>Use of fossil fuel for transportation (FFB, fertilizer, manpower)</p>	<p>Maintenance the vehicle on regular basis</p> <p>Planting trees</p> <p>Transportation arrangement (effective and efficient)</p> <p>Socialization to all level of worker on GHG mitigation plan related to machinery use and use of fossil fuel</p>	<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>	
		<p>Fertilizer and pesticide application</p>	<p>Planting beneficial plant</p> <p>Spraying knapsack calibration</p> <p>Spraying based on weed percentage &gt;60%</p> <p>Effective fertilizer application as per recommendation</p>	<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>	

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		<table border="1"> <tr> <td rowspan="3">Use of fossil fuel for electric generation</td> <td>Maintenance the machinery (genset) on regular basis</td> <td rowspan="3"> <ul style="list-style-type: none"> <li>• Vehicle maintenance record</li> <li>• Planting record</li> <li>• Evaluation on Genset's fuel efficiency</li> </ul> </td> </tr> <tr> <td>Socialization to all level of worker on GHG mitigation plan related to machinery use and use of fossil fuel; and electricity efficiency</td> </tr> <tr> <td>Emission monitoring on regular basis</td> </tr> <tr> <td rowspan="2">Use of fossil fuel for transportation (FFB, CPO, PK, EFB)</td> <td>Maintenance the vehicle on regular basis</td> <td rowspan="2"> <ul style="list-style-type: none"> <li>• Vehicle maintenance record</li> <li>• Evaluation on electricity efficiency</li> </ul> </td> </tr> <tr> <td>Socialization to all level of worker on GHG mitigation plan related to electricity efficiency</td> </tr> <tr> <td rowspan="3">Operation of POM's machinery including boiler</td> <td>Maintenance the POM's machinery on regular basis</td> <td rowspan="3"> <ul style="list-style-type: none"> <li>• Machinery maintenance record</li> <li>• Evaluation on boiler's efficiency</li> <li>• Emission monitoring report</li> </ul> </td> </tr> <tr> <td>Socialization to all level of worker on GHG mitigation plan related to emission</td> </tr> <tr> <td>Emission monitoring on regular basis</td> </tr> </table>	Use of fossil fuel for electric generation	Maintenance the machinery (genset) on regular basis	<ul style="list-style-type: none"> <li>• Vehicle maintenance record</li> <li>• Planting record</li> <li>• Evaluation on Genset's fuel efficiency</li> </ul>	Socialization to all level of worker on GHG mitigation plan related to machinery use and use of fossil fuel; and electricity efficiency	Emission monitoring on regular basis	Use of fossil fuel for transportation (FFB, CPO, PK, EFB)	Maintenance the vehicle on regular basis	<ul style="list-style-type: none"> <li>• Vehicle maintenance record</li> <li>• Evaluation on electricity efficiency</li> </ul>	Socialization to all level of worker on GHG mitigation plan related to electricity efficiency	Operation of POM's machinery including boiler	Maintenance the POM's machinery 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>	Socialization to all level of worker on GHG mitigation plan related to emission	Emission monitoring on regular basis	
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7.10.2	<b>(C)</b> Since 2014, an estimate of carbon stocks in the proposed development area has been carried out along with potential sources of emissions that can occur directly as a result of the development and plans to minimize these emissions are prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).	PT Eastern Sumatra Indonesia (Bukit Maradja Estate and Bukit Maradja POM) - 1961; PT Kerasaan Indonesia (Kerasaan Estate) - 1962 and PT Timbang Deli Indonesia (Timbang Deli Estate) is an existing oil palm plantation company since Dutch Era 1921 and acquisition in 1961/1962 by Indonesia government. As unit of certification, the company have no plan for new development.	Complied														
7.10.3	<b>(C)</b> Other significant pollutant identification results are available and plans to reduce or minimize them are implemented and monitored.	Unit of Certification has prepared a strategy in effort to reduce and mitigate pollution and emission. Monitoring of pollution and emission	Complied														

		quality for plantation has been planned and implemented, e.g. air quality ambient for boiler and power generator, water quality test for surface and ground water, effluent water quality, noise level, etc. The monitoring result is incorporated in RKL/RPL (environmental management and monitoring plan) and reported regularly to the government. In Perlabian POM, all emission are monitored.	
<b>Criteria 7.11:</b> Fire is not used for preparing land and is prevented in the managed area.			
7.11.1	<b>(C)</b> Land for new planting or replanting is not prepared by burning.	PT Eastern Sumatra Indonesia (Bukit Maradja Estate and Bukit Maradja POM) - 1961; PT Kerasaan Indonesia (Kerasaan Estate) - 1962 and PT Timbang Deli Indonesia (Timbang Deli Estate) is an existing oil palm plantation company since Dutch Era 1921 and acquisition in 1961/1962 by Indonesia government. As unit of certification, the company have no plan for new development.  During field visit 21D15A Div. 1 (replanting area already planted) and 21D16 Div.1 (replanting area for legume cover crops), no fire used for replanting land preparation.  Unit of certification has no program for new development nor extend the existing area.	Complied
7.11.2	The unit of certification establishes fire prevention and control measures for lands that are directly managed by the unit of certification.	PT Eastern Sumatra Indonesia (Bukit Maradja Estate and Bukit Maradja POM) - 1961; PT Kerasaan Indonesia (Kerasaan Estate) - 1962 and PT Timbang Deli Indonesia (Timbang Deli Estate) is an existing oil palm plantation company since Dutch Era 1921 and acquisition in 1961/1962 by Indonesia government. As unit of certification, the company have no plan for new development.  Unit of Certification has list of "Sarana dan Prasarana Pengendalian Kebakaran Lahan Perkebunan" where the list fire equipment as referred to Minister of Agriculture Regulation No. 05/PERMENTAN/KB.410/1/2018.	Complied

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7.11.3	The unit of certification engages stakeholders in adjacent locations for fire prevention and control measures.	PT Eastern Sumatra Indonesia (Bukit Maradja Estate and Bukit Maradja POM) - 1961; PT Kerasaan Indonesia (Kerasaan Estate) - 1962 and PT Timbang Deli Indonesia (Timbang Deli Estate) is an existing oil palm plantation company since Dutch Era 1921 and acquisition in 1961/1962 by Indonesia government. As unit of certification, the company have no plan for new development.	Complied
<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.			
7.12.1	<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 HCV or HCS forests. Historical analysis of Land Use Change Analysis (LUCA) is carried out before any new land clearing, in accordance with the RSPO LUCA Guidance document (see indicator 7.12.2).	PT Eastern Sumatra Indonesia (Bukit Maradja Estate and Bukit Maradja POM) - 1961; PT Kerasaan Indonesia (Kerasaan Estate) - 1962 and PT Timbang Deli Indonesia (Timbang Deli Estate) is an existing oil palm plantation company since Dutch Era 1921 and acquisition in 1961/1962 by Indonesia government. As unit of certification, the company have no plan for new development.	Complied
7.12.2	<b>(C)</b> HCV and HCS forests, and other conservation areas are identified as follows: 7.12.2a) For existing plantations, with an HCV assessments conducted by RSPO- approved assessors and have no new land clearing after 15 November 2018, the existing HCV assessments remains valid. 7.12.2 b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the latest HCSA Toolkit and HCV-HCSA Assessment Manual that is applicable at the time of the assessment. This includes stakeholder consultation and take into account wider landscape- level consideration.	Bukit Maradja POM and its supply bases is long-established plantation. HCV assessment conducted in 2009 and still using RSPO HCV Approved assessor. Whereby, in Timbang Deli Estate HCV Assessment conducted in 2017 with HCV provisional ALS ((Provisional ALS160007HM). There is no land clearing after 15 November 2018 by unit of certification. Bukit Maradja POM and its supply bases is long-established plantation. HCV assessment conducted in 2009 and still using RSPO HCV Approved assessor. Whereby, in Timbang Deli Estate HCV Assessment conducted in 2017 with HCV provisional ALS ((Provisional ALS160007HM). There is no land clearing after 15 November 2018 by unit of certification.	Complied
7.12.3	<b>(C)</b> In High Forest Cover Landscapes (HFCLs) within HFCCs, a specific procedure will apply for legacy cases and development by indigenous peoples and local communities with legal or customary rights, taking into	Not applicable for Indonesia.	Not Applicable

	consideration regional and national multi-stakeholder processes. Until this procedure is developed and endorsed, 7.12.2 applies.		
<p><b>PROCEDURAL NOTE for 7.12.3:</b></p>			
<p>Indicator 7.12.3. is not relevant to Indonesia, until further decisions by the RSPO.</p>			
7.12.4	<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 plans to protect and/or enhance HCV and HCS forests, peatland and other conservation areas are developed, implemented and adapted if necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan was developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p>	<p>PT. Timbang Deli Indonesia have conducted HCV assessment in cooperation with “Fakultas Kehutanan Institut Pertanian Bogor” in 2014. The assessment team comprise of: Dr. Ir Nyoto Santoso, MS (Team Leader, wildlife expert; RSPO approved HCV Assessor), Eko Adhiyanto, S.Hut, (vegetation expert; RSPO approved HCV Assessor), Handian Purwawangsa, S.Hut, M.Si, (social aspect expert; RSPO approved HCV Assessor), Udi Kusnidar, S.Hut, (social expert; RSPO approved HCV Assessor), Ir. Heri Wiyono, (social expert), Irham Fauzi, S.Hut, (GIS expert).</p> <p>The HCV assessment refers to “Panduan Identifikasi Kawasan Bernilai Konservasi Tinggi di Indonesia”, issued by “Konsorsium Revisi HCV Toolkit Indonesia”, July 2008. The field exercise for primary data collection dated 7 - 11 March 2014. The process involving surrounding community through Focus Group Discussion/ FGD and interview. Public consultation meeting dated 11 March 2014 – whereby attended by 19 individuals and representatives of stakeholders such as “Badan Pertanahan Kabupaten Deli Serdang” and “Badan Lingkungan Hidup Kabupaten Deli Serdang”. As part of reporting process, the assessment have been peer-reviewed by Dr. Rahmad Hermawan in May 2014.</p> <p>Based on the HCV identification and analysis, no indication/presence of primary forest or peat soil in the scope area. The majority of HGU PT. Timband Deli Indonesia was rubber plantation, while the rest consist of infrastructure such as road, worker housing, offices, laboratory and <i>arboretum</i>.</p>	Complied

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		<p>Based on the HCV assessment report, it was known that some flora and fauna identified in the concession area. Flora: found 170 types of flora from 63 families, consist of:</p> <ul style="list-style-type: none"> <li>• <i>Pteridophyta</i>: found 10 families with 12 spesies. No protected species; No species under category of CR, EN, VU based on IUCN Redlist.</li> <li>• <i>Spermatophyta</i>:             <ul style="list-style-type: none"> <li>- <i>Gymnospermae</i>: found 2 families with 2 spesies and no protected species as in "Peraturan Pemerintah No.7 tahun 1999"; and 1 species under category VU under IUCN Redlist which was Pine (<i>Pinus merkusii</i>).</li> </ul> </li> <li>• <i>Angiospermae</i>:             <ul style="list-style-type: none"> <li>- <i>Monocotyledonae</i>: found 17 families with 53 spesies where no protected species noted, as listed under "Peraturan Pemerintah No.7 tahun 1999"; No species under category of CR, EN, VU based on IUCN Redlist.</li> <li>- <i>Dicotyledonae</i>: found 34 families with 103 spesies where no protected species noted, as listed under "Peraturan Pemerintah No.7 tahun 1999"; found 1 species under VU category which was "Mahoni" (<i>Swietenia macrophylla</i>).</li> </ul> </li> </ul> <p>Fauna: found 50 species from 34 families, consist of:</p> <ul style="list-style-type: none"> <li>• <i>Mammals</i>: found 2 species under 2 families. and no protected species as in "Peraturan Pemerintah No.7 tahun 1999"; No species under category of CR, EN, VU based on IUCN Redlist.</li> <li>• <i>Aves</i>: found 41 species of birds from 26 <i>families</i> whereby 6 species protected under "Peraturan Pemerintah No.7 tahun 1999" (<i>Elanus caeruleus</i>, <i>Haliastur indus</i>, <i>Halcyon chloris</i>, <i>Halcyon smyrnensis</i>, <i>Rhipidura javanica</i>, <i>Necatirina malacensis</i>). No species under category of CR, EN, VU based on IUCN Redlist.</li> </ul>	
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		<ul style="list-style-type: none"> <li>• <i>Reptilia</i> and <i>Amphibia</i>: found 4 species under 4 families. and no protected species as in "Peraturan Pemerintah No.7 tahun 1999"; No species under category of CR, EN, VU based on IUCN Redlist.</li> </ul> <p>For the purpose of new planting - a plan to develop oil palm plantation, conversion from rubber plantation; PT. Timbang Deli Indonesia conducted HCV assessment in cooperation with "Koompasia Enviro Institute" in 2017. The assessment team comprise of: Henry Marpaung (Team Leader; Social-cultural expert; ALS licensed assessor Provisional ALS160007HM); Wibowo A. Djatmiko (Team member; Ecology/biodiversity); Riswan, (Team member; Environmental Service expert); Harry Kurniawan, (Team member; GIS and landscape); Ridho Anggara (Team member, GIS assisstant).</p> <p>The HCV assessment refers to "Panduan Identiikasi Kawasan Bernilai Konservasi Tinggi di Indonesia", issued by "Konsorsium Revisi HCV Toolkit Indonesia", July 2008 – and "Common Guidance for the Identification of HCV", 2013.</p> <p>The field exercise for primary data collection dated 6-8 September 2017. The process involving surrounding community through Focus Group Discussion/ FGD and interview. Public consultation meeting dated 8 September 2017 – whereby attended by 20 individuals and representatives of stakeholders. As part of reporting process, the assessment have been peer-reviewed by Dr. Kunkun J. Gurmaya in 20 October 2017 as reported in "Peer Review Report Penilaian HCV di Kebun PT. Timbang Deli Indonesia, Kabupaten Deli Serdang, Provinsi Sumatera Utara".</p> <p>From the 2017 HCV assessment found the area is not a primary forest. Most of the area surrounding the license area is covered by rubber and oil palm owned by villagers and others plantation companies. HCV identification showed that HCV 1 is covers 1.972 Ha, HCV 4 is found on 11.083 Ha; HCV 6 is found 0.872 Ha. Total HCV area indentified in PT. Timbang Deli Indonesia was 11.955 Ha or 1,23% of the total permanent</p>	
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		<p>land use title (972,19 Ha). In addition, as per high carbon stock assessment, there was an additional 2.82 Ha from riparian zone and lowland area to be set aside as HCV (part of it; 1.57 Ha was overlapping with HCV4). The total HCV area was 13.53 Ha.</p> <p>According to HCV management and monitoring plan, there are only two concern program that continuous implement, such as monitoring of threats activities along riparian area and wildlife animal monitoring. Certificate holders implement this plan in monthly basis and the record of monitoring is available in place.</p>	
7.12.5	Where rights of local communities have been identified in HCV areas and HCS forest after 15 November 2018, peatland and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.	HCV assessment conducted in 2009. There is no land clearing after 15 November 2018.	Complied
7.12.6	All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.	<p>PT. Timbang Deli Indonesia have conducted HCV assessment in cooperation with "Fakultas Kehutanan Institut Pertanian Bogor" in 2014. The assessment team comprise of: Dr. Ir Nyoto Santoso, MS (Team Leader, wildlife expert; RSPO approved HCV Assessor), Eko Adhiyanto, S.Hut, (vegetation expert; RSPO approved HCV Assessor), Handian Purwawangsa, S.Hut, M.Si, (social aspect expert; RSPO approved HCV Assessor), Udi Kusnidar, S.Hut, (social expert; RSPO approved HCV Assessor), Ir. Heri Wiyono, (social expert), Irham Fauzi, S.Hut, (GIS expert).</p> <p>The HCV assessment refers to "Panduan Identifikasi Kawasan Bernilai Konservasi Tinggi di Indonesia", issued by "Konsorsium Revisi HCV Toolkit Indonesia", July 2008. The field exercise for primary data collection dated 7 - 11 March 2014. The process involving surrounding community through Focus Group Discussion/ FGD and interview. Public consultation meeting dated 11 March 2014 – whereby attended by 19</p>	Complied



		<p>individuals and representatives of stakeholders such as “Badan Pertanahan Kabupaten Deli Serdang” and “Badan Lingkungan Hidup Kabupaten Deli Serdang”. As part of reporting process, the assessment have been peer-reviewed by Dr. Rahmad Hermawan in May 2014.</p> <p>Based on the HCV identification and analysis, no indication/presence of primary forest or peat soil in the scope area. The majority of HGU PT. Timband Deli Indonesia was rubber plantation, while the rest consist of infrastructure such as road, worker housing, offices, laboratory and <i>arboretum</i>.</p> <p>Based on the HCV assessment report, it was known that some flora and fauna identified in the concession area. Flora: found 170 types of flora from 63 families, consist of:</p> <ul style="list-style-type: none"> <li>• <i>Pteridophyta</i>: found 10 families with 12 spesies. No protected species; No species under category of CR, EN, VU based on IUCN Redlist.</li> <li>• <i>Spermatophyta</i>:             <ul style="list-style-type: none"> <li>- <i>Gymnospermae</i>: found 2 families with 2 spesies and no protected species as in “Peraturan Pemerintah No.7 tahun 1999”; and 1 species under category VU under IUCN Redlist which was Pine (<i>Pinus merkusii</i>).</li> </ul> </li> <li>• <i>Angiospermae</i>:             <ul style="list-style-type: none"> <li>- <i>Monocotyledonae</i>: found 17 families with 53 spesies where no protected species noted, as listed under “Peraturan Pemerintah No.7 tahun 1999”; No species under category of CR, EN, VU based on IUCN Redlist.</li> <li>- <i>Dicotyledonae</i>: found 34 families with 103 spesies where no protected species noted, as listed under “Peraturan Pemerintah No.7 tahun 1999”; found 1 species under VU category which was “Mahoni” (<i>Swietenia macrophylla</i>).</li> </ul> </li> </ul>	
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		<p>Fauna: found 50 species from 34 families, consist of:</p> <ul style="list-style-type: none"> <li>• <i>Mammals</i>: found 2 species under 2 families. and no protected species as in "Peraturan Pemerintah No.7 tahun 1999"; No species under category of CR, EN, VU based on IUCN Redlist.</li> <li>• <i>Aves</i>: found 41 species of birds from 26 <i>families</i> whereby 6 species protected under "Peraturan Pemerintah No.7 tahun 1999" (<i>Elanus caeruleus</i>, <i>Haliastur indus</i>, <i>Halcyon chloris</i>, <i>Halcyon smyrnensis</i>, <i>Rhipidura javanica</i>, <i>Necatirina malacensis</i>). No species under category of CR, EN, VU based on IUCN Redlist.</li> <li>• <i>Reptilia</i> and <i>Amphibia</i>: found 4 species under 4 families. and no protected species as in "Peraturan Pemerintah No.7 tahun 1999"; No species under category of CR, EN, VU based on IUCN Redlist.</li> </ul> <p>HCV programme that implemented by unit of certification is more concern to monitor any threat activities near watercourse/riparian and wildlife animal monitoring.</p>	
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.	<p>HCV assessment conducted in 2009. There is no land clearing after 15 November 2018.</p> <p>HCV Area Monitoring Checklist dated 26 February 2021. All identified HCV in well condition and managed. HCV 6: Cemetery (Block C33 Division 2 Bukit Maradja Estate) – No RTE species founded, common birds and long tail macaque are identified; HCV 4: Buffer zone (Division 1 Kerasaan Estate) – No RTE species found, bushes bird founded.</p>	Complied
7.12.8	<b>(C)</b> Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV- HCSA assessment since 15 November 2018, the Remediation and Compensation Procedures (RaCP) applies.	<p>Bukit Maradja POM and its supply bases is long-established plantation. HCV assessment conducted in 2009 and still using RSPO HCV Approved assessor. Whereby, in Timbang Deli Estate HCV Assessment conducted in 2017 with HCV provisional ALS (Provisional ALS160007HM).</p> <p>There is no land clearing after 15 November 2018 by unit of certification. Conversion from rubber to Oil Palm crops in Timbang Deli Estate only in 2018. NPP notification has been submitted on 12 February 2018 and is</p>	Complied

		available on RSPO website ( <a href="https://rspo.org/certification/new-planting-procedure/public-consultations/pt-timbang-deli-indonesia-sipef-group">https://rspo.org/certification/new-planting-procedure/public-consultations/pt-timbang-deli-indonesia-sipef-group</a> ).	
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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 POM	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 POM	Mukomuko Regency, Bengkulu Province, Indonesia	Bunga Tanjung Estate, Air Bikuk Estate, Air Buluh Estate and KMD	2011	Certified
			PT Mukomuko Agro Sejahtera: - Air Manjuntio Estate - Malin Deman Estate	2014	Certified
			Ex. PT Asri Rimba Wirabhakti (acquisition in 2018)	2021	A new NPP submitted in 2020 to cover Ex PT ARWB as PT MMAS; Changes due to Covid-19 pandemic
PT Tolan Tiga	Bukit Maradja POM	Simalungun Regency, North Sumatera, Indonesia	- Bukit Maradja Estate (PT Eastern Sumatra Indonesia) - Kerasaan Estate (PT Kerasaan Indonesia) - PT Timbang Deli Indonesia	2010  2018	Certified May 2010  Certified in 2018 as supply base of Bukit Maradja POM, PT Eastern Sumatra Indonesia
	Perlavian POM	Labuhan Batu Selatan Regency, North Sumatera, Indonesia	Perlavian Estate and Tolan Estate.	2010	Certified May 2010
PT Umbul Mas Wisesa	Umbul Mas Wisesa POM	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	Kati Lama POM	Musirawas Regency, South Sumatera, Indonesia		2023	Certification to take place after obtaining HGU; A new NPP submitted in 2019 to cover new areas licenced at the end of 2018.
PT Agro Rawas Ulu	No mill	Musirawas Regency, South Sumatera, Indonesia		2023	Part of Muara Rupit POM supply base; Certification to take place after obtaining HGU.
PT Agro Muara Rupit	Muara Rupit POM	Musirawas Regency, South Sumatera, Indonesia		2023	Certification to take place after obtaining HGU; A new NPP submitted in 2019 to cover new areas licenced at the end of 2018.

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Hargy Oil Palm Limited (HOPL)	Hargy POM	East of Biiala, West New Britain Province, PNG	Hargy Estate	2009	Certified in April 2009
	Navo POM	50 Kms East of Biiala, West New Britain Province, PNG	Navo Estate, Bakada Estate and Mengan Estate	2009	Certified in April 2009
	Barema POM	30 km East of Biiala, West New Britain Province, PNG	Barema Estate	2014	RSPO Certified in April 2014
PT Dendymarker Indah Lestari	Dendymarker POM	Musirawas Utara Regency, Sumatera Province, Indonesia	Sei Mandang Estate, Sei Liam Estate	2015	Acquired on 1 August 2017. RSPO certified in 2015.
PT Citra Sawit Mandiri	No mill	Labuhanbatu Regency, North Sumatera Province		2022	Certification to take place after HGU, following review by RSPO.

**Appendix C: GHG Reporting Executive Summary**

The GHG emissions that were produced in 2020 for Bukit Maradja POM and supply base was calculated using the PalmGHG Calculator version 4. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in 2020 for Bukit Maradja POM and supply base are as following:

Emission per product	tCO <sub>2</sub> e/tProduct
CPO	1.07
PK	1.07

Extraction	%
OER	23.37
KER	4.91

Production	t/yr
FFB Process	121660.31
CPO Produced	28427.27
PKO Produced	5977.86

Land Use	Ha
OP Planted Area	5145.98
OP Planted on peat	0
Conservation (forested)	0
Conservation (non-forested)	137.66
<b>Total</b>	<b>5283.64</b>

**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</b>								
Land Conversion	26229.26	0.41	24003.07	0.42	0.00	0.00	50232.34	0.83
CO <sub>2</sub> Emission from fertilizer	1569.00	0.02	885.62	0.02	0.00	0.00	2454.62	0.04
N <sub>2</sub> O Emission from fertilizer	1538.17	0.02	356.68	0.01	0.00	0.00	1894.85	0.03
Fuel Consumption	281.72	0.00	79.53	0.00	0.00	0.00	361.24	0.00
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Sink</b>								
Crop Sequestration	-22380.73	-0.35	-19714.88	-0.34	0.00	0.00	-42095.61	-0.69
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

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<b>Total</b>	<b>7237.42</b>	<b>0.11</b>	<b>5610.01</b>	<b>0.10</b>	<b>0.00</b>	<b>0.00</b>	<b>12847.44</b>	<b>0.21</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	23847.48	0.20
Fuel Consumption	88.23	0.00
Grid Electricity Utilization	3.27	0.00
<b>Credit</b>		
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
<b>Total</b>	<b>23938.98</b>	<b>0.20</b>

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

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

\*This mill has no kernel crusher operation.

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

<b>POME Diverted to Anaerobic Digestion:</b>	
Divert to anaerobic pond (%)	100
Divert to methane captured (flaring) (%)	0
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>				
No.	Month - Year	Volume of FFB from certified supply bases (mt)	Volume of FFB from uncertified supply bases (mt)	Total FFB/Month (mt)
1	Mar 2020	9,697.68	0	9,697.68
2	Apr 2020	11,816.21	0	11,816.21
3	May 2020	9,856.12	0	9,856.12
4	Jun 2020	13,533.14	0	13,533.14
5	Jul 2020	12,005.42	0	12,005.42
6	Aug 2020	11,192.91	0	11,192.91
7	Sept 2020	10,844.90	0	10,844.90
8	Oct 2020	9,220.22	0	9,220.22
9	Nov 2020	7,832.61	0	7,832.61
10	Dec 2020	7,399.41	0	7,399.41
11	Jan 2021	7,930.04	0	7,930.04
12	Feb 2021	7,571.11	0	7,571.11
	Total	118,899.77	-	118,899.77

<b>B. Monthly Records of Certified CPO &amp; PK since the last audit</b>			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1	Mar 2020	2,307.49	485.415
2	Apr 2020	2,794.53	576.938
3	May 2020	2,227.61	433.809
4	Jun 2020	3,163.44	656.011
5	Jul 2020	2,813.03	590.342
6	Aug 2020	2,631.83	560.46
7	Sept 2020	2,546.14	551.097
8	Oct 2020	2,188.18	472.316
9	Nov 2020	1,747.44	371.843
10	Dec 2020	1,717.65	345.814
11	Jan 2021	1,775.75	386.385
12	Feb 2021	1,758.33	365.23
	Total	27,671.42	5,795.66

<b>C. Records of Certified CPO &amp; PK Sold under PalmTrace since the last audit (if any)</b>				
No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
1	PT SMART	TR-551f6c77-22a4	0	433.36
2	PT SMART	TR-1ff6f61e-1398	0	500
3	PT SMART	TR-5a555887-ae36	0	66.64
4	PT SMART	TR-16ea600f-fc13	0	431.52
5	PT SMART	TR-919471ec-a5a8	0	500
6	PT SMART	TR-d34c0af8-a76b	0	68.48
7	PT SMART	TR-eb5fa018-0e3c	0	631.54



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8	PT SMART	TR-6be7b511-0dc6	0	544.29
9	PT SMART	TR-84983324-7684	0	18.46
10	PT SMART	TR-ce3458ad-ac61	0	539.43
11	PT SMART	TR-4de5cd58-3a77	0	55.71
12	PT SMART	TR-0fe4e3b6-0a64	0	500
13	PT SMART	TR-08d4d484-b0c1	0	10.57
14	PT SMART	TR-8e31ec18-f63a	0	426.84
	<b>Total</b>		-	<b>4,726.84</b>

<b>D. Records of CPO &amp; PK Sold under other schemes since the last audit (if any)</b>					
<b>No.</b>	<b>Month- Year</b>	<b>Buyers Name</b>	<b>Scheme Name</b>	<b>CPO Sold (mt)</b>	<b>PK Sold (mt)</b>
1	Mar-2020	PT. SMART TBK	ISCC	163.62	-
2	Mar-2020	PT. SMART TBK	ISCC	107.97	-
3	Mar-2020	PT. SMART TBK	ISCC	981.9	-
5	Mar-2020	PT. SMART TBK	ISCC	498.95	-
6	Mar-2020	PT. SMART TBK	ISCC	99.81	-
4	Apr-2020	PT. SMART TBK	ISCC	16.53	-
7	Apr-2020	PT. SMART TBK	ISCC	999.09	-
8	Apr-2020	PT. SMART TBK	ISCC	499.31	-
9	Apr-2020	PT. SMART TBK	ISCC	288.2	-
10	14/05/2020	PT. SMART TBK	ISCC	210.93	-
11	14/05/2020	PT. SMART TBK	ISCC	499.45	-
12	14/05/2020	PT. SMART TBK	ISCC	499.32	-
13	14/05/2020	PT. SMART TBK	ISCC	499.13	-
14	14/05/2020	PT. SMART TBK	ISCC	698.9	-
15	14/05/2020	PT. SMART TBK	ISCC	498.49	-
16	08/06/2020	PT. SMART TBK	ISCC	1.18	-
17	08/06/2020	PT. SMART TBK	ISCC	244.92	-
18	08/06/2020	PT. SMART TBK	ISCC	499.64	-
19	08/06/2020	PT. SMART TBK	ISCC	1746.93	-
20	14/07/2020	PT. SMART TBK	ISCC	254.6	-
21	14/07/2020	PT. SMART TBK	ISCC	327.48	-
22	14/07/2020	PT. SMART TBK	ISCC	498.76	-
23	14/07/2020	PT. SMART TBK	ISCC	488.86	-
24	14/07/2020	PT. SMART TBK	ISCC	1254.31	-
25	11/08/2020	PT. SMART TBK	ISCC	171.64	-
26	11/08/2020	PT. SMART TBK	ISCC	10.15	-

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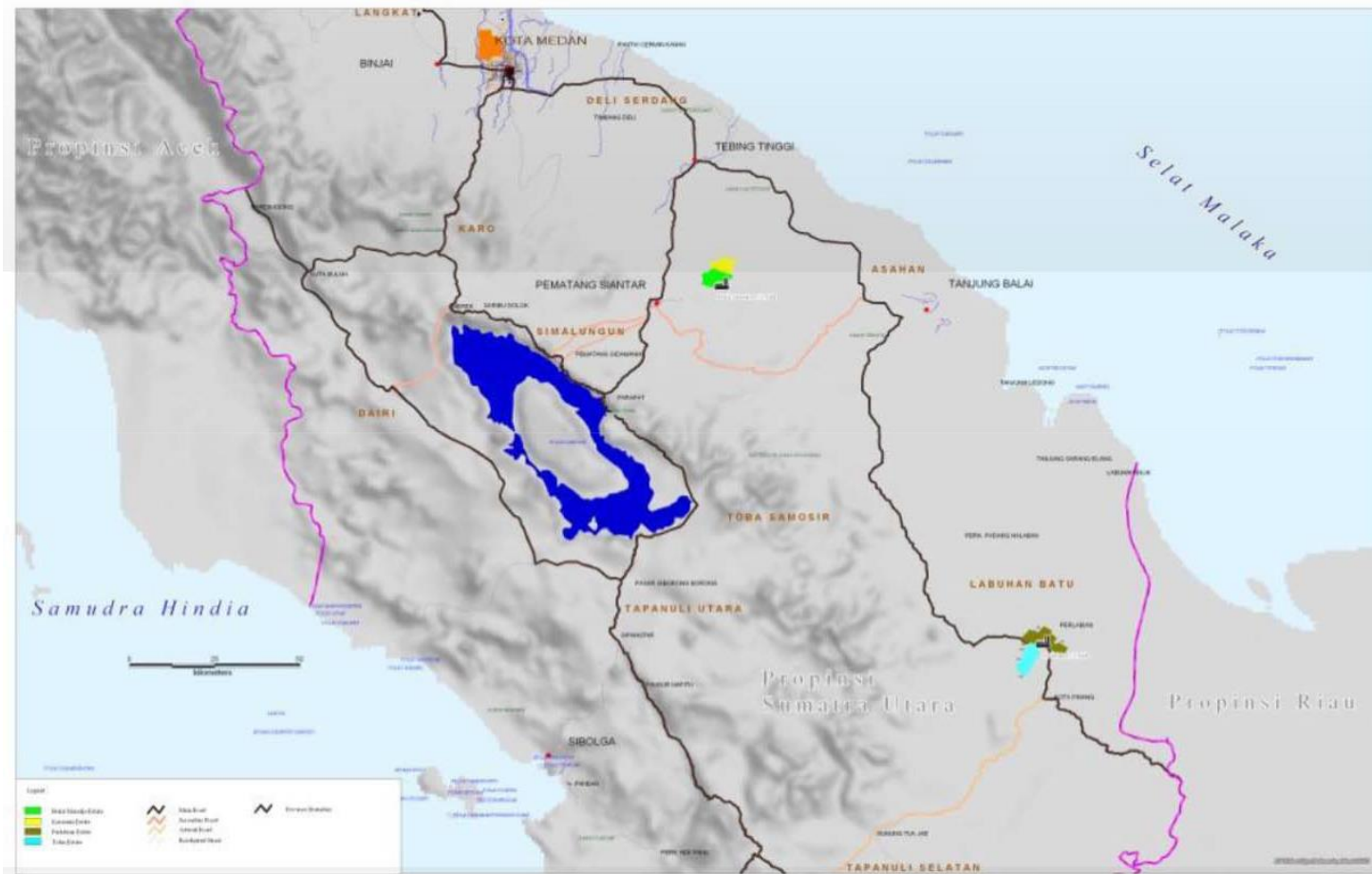
27	11/08/2020	PT. SMART TBK	ISCC	43.71	-
28	11/08/2020	PT. SMART TBK	ISCC	499.23	-
29	11/08/2020	PT. SMART TBK	ISCC	363.41	-
30	11/08/2020	PT. SMART TBK	ISCC	71.03	-
31	11/08/2020	PT. SMART TBK	ISCC	998.52	-
32	11/08/2020	PT. SMART TBK	ISCC	1298.46	-
33	16/09/2020	PT. SMART TBK	ISCC	135.65	-
34	16/09/2020	PT. SMART TBK	ISCC	428.29	-
35	16/09/2020	PT. SMART TBK	ISCC	499.25	-
36	16/09/2020	PT. SMART TBK	ISCC	499.49	-
37	16/09/2020	PT. SMART TBK	ISCC	107.62	-
38	16/09/2020	PT. SMART TBK	ISCC	453.34	-
39	08/10/2020	PT. SMART TBK	ISCC	391.44	-
40	08/10/2020	PT. SMART TBK	ISCC	499.02	-
41	08/10/2020	PT. SMART TBK	ISCC	46.07	-
42	08/10/2020	PT. SMART TBK	ISCC	499.11	-
43	08/10/2020	PT. SMART TBK	ISCC	499.42	-
44	08/10/2020	PT. SMART TBK	ISCC	395.55	-
45	08/10/2020	PT. SMART TBK	ISCC	151.06	-
46	08/10/2020	PT. SMART TBK	ISCC	399.89	-
47	10/11/2020	PT. SMART TBK	ISCC	103.6	-
48	10/11/2020	PT. SMART TBK	ISCC	348.19	-
49	10/11/2020	PT. SMART TBK	ISCC	375.89	-
51	10/11/2020	PT. SMART TBK	ISCC	985.54	-
52	10/11/2020	PT. SMART TBK	ISCC	499.38	-
53	21/12/2020	PT. SMART TBK	ISCC	123.67	-
54	21/12/2020	PT. SMART TBK	ISCC	499.57	-
55	21/12/2020	PT. SMART TBK	ISCC	499.98	-
56	21/12/2020	PT. SMART TBK	ISCC	499.58	-
57	21/12/2020	PT. SMART TBK	ISCC	378.31	-
TOTAL				24,653.34	

<b>E. Records of CPO &amp; PK Sold as conventional since the last audit (if any)</b>			
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)
	Nil		

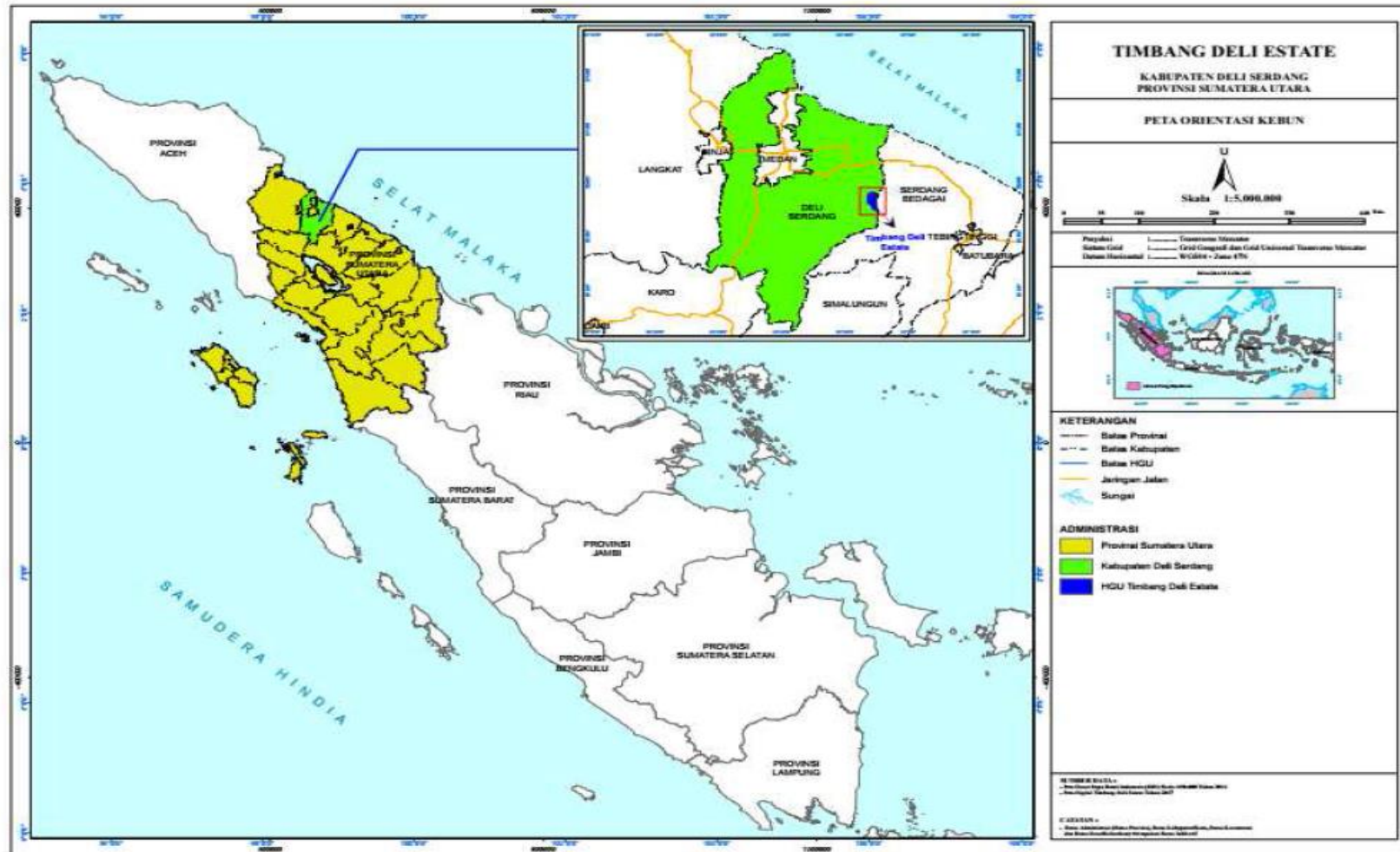
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<b>F. Records of Certified CPO Sold under RSPO Credits since the last audit (if any)</b>			
<b>No.</b>	<b>Buyers Name</b>	<b>PalmTrace Trading License Number</b>	<b>RSPO Credits of Certified CPO Sold (mt)</b>
	<b>Nil</b>		

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

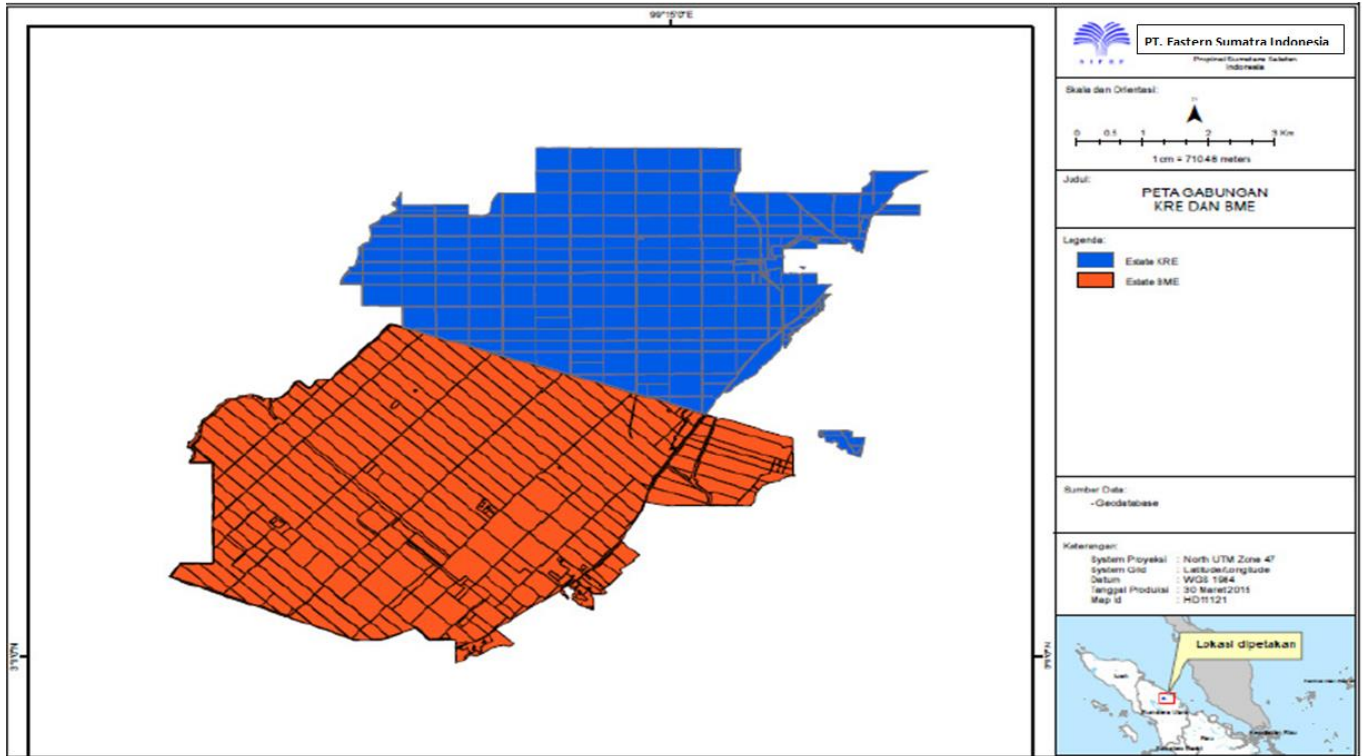


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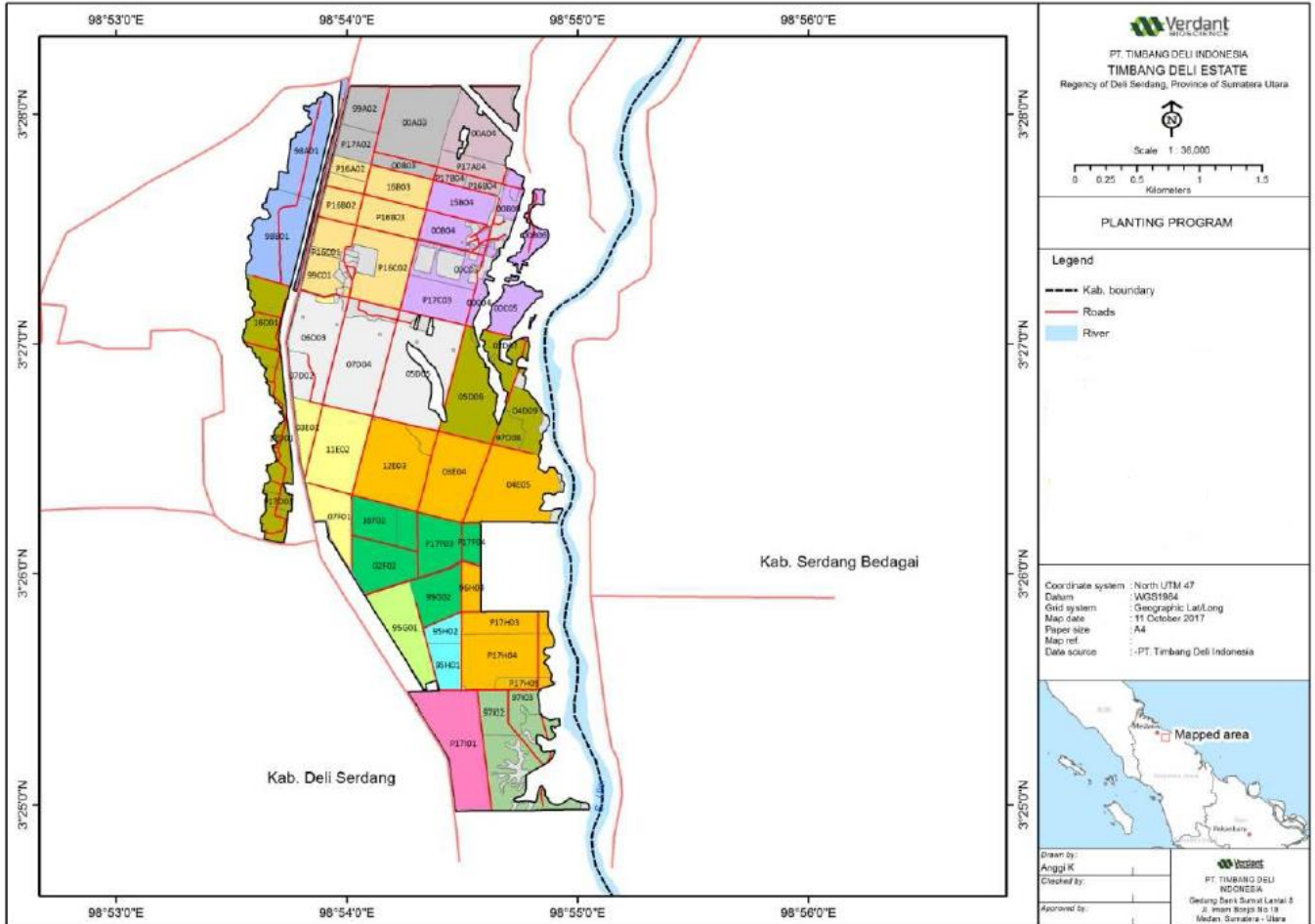
**Appendix F: Estate Field Map**

*Bukit Maradja Estate and Kerasaan Estate*



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*Timbang Deli Estate*



**Appendix G: List of Smallholder Sampled  
Not Applicable**



**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
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