

RSPO PRINCIPLE AND CRITERIA PUBLIC SUMMARY REPORT

Client Company name (Parent Company): PT Inti Indosawit Subur

Client company Address:

Jl. MH. Thamrin No 31 Jakarta 10230, Indonesia

Certification Unit:

PT Indo Sepadan Jaya - Tanjung Selamat Mill

Location of Certification Unit:

Kampung Padang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatera Province, Indonesia

Date of Final Report:

24 August 2021



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Section 1: Scope of the Certification Assessment

1. Company Details						
Parent Company	PT. Inti Indosawit Subur					
RSPO Membership Number	1-0022-06-000-00					
Address	Jl. MH. Thamrin No 31 Jakarta 10230, Indonesia					
Palm Oil Mill / Group Manager / Estate (Certification Unit)	- ' ' ' '					
Location / Address	Location / Address Kampung Padang Village, Bilah Hilir District, Labuhan Batu Regency, Nort Province, Indonesia.					
Website	www.asianagri.com					
Management Representative	Mr. Putu Ghrayte Yonata Aksa E-mail <u>Putu Aksa@asianagri.com</u>					
Telephone	021 2301119					

2. Certification Information						
Certificate Number	RSPO 620704	Date of First Certification	26/05/2015			
		Certificate Start Date	24/08/2021			
		Certificate Expiry Date	23/08/2026			
Scope of Certification	Production of Palm Oil and Palr	m Kernel				
Visit Objectives	according to Scenario 4 RSI	a continuation of previous remo PO with 50% increase in samplin	ng.			
	 Determination of the confo supply bases with RSPO Pri 	ormity and consistency of Tanj nciple and Criteria.	ung Selamat POM and its			
	-	the management system to ens regulatory and contractual requ	_			
Assessment Cycle	☐ Initial Assessment					
	☑ Recertification Assessment ((RA 1)				
	☐ Annual Surveillance Assessn	nent (RA Choose an item. ; AS.	A Choose an item.)			
	☐ Scope Extension					
Applicable Standards	☐ RSPO P&C 2018 for the Prod	uction of Sustainable Palm Oil				
	☑ Indonesia National Interpretation 2020 for RSPO P&C 2018 for the Production of Sustainable Palm Oil					
	☐ Group Certification 2016					
	□ RSPO Independent Smallholders Standard 2019					
Supply Chain Module	☐ Identity Preserved ☒ Mass E	Balance				



3. Other Certifications							
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date				
ID05/65250	ISO 14001:2015	SGS Indonesia	10/06/2023				
EU-ISCC-Cert- DE100-02727121	ISCC	SGS Indonesia	07/07/2022				
BSI-ISPO-619189	ISPO	BSI Indonesia	21/03/2024				

4. Location(s) of Mill & Supply Bases							
Name (Mill / Supply Base)	Location	GPS Coordinates Latitude Longitude					
(Pini / Supply base)							
Tanjung Selamat Mill	Kampung Padang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatera, Indonesia	02° 07′ 39.72″ N	100° 00′ 08.82″ E				
Tanjung Selamat Estate	Kampung Padang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatera, Indonesia	02° 07′ 49.49″ N	100° 06′ 14.71″ E				
Pangkatan Estate	Sennah Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatera, Indonesia	02° 11′ 57.57″ N	100° 00′ 53.63″ E				
Note:							

5. Description of Supply Base							
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted		
Tanjung Selamat Estate	3,858	6.57	36.75	3,901.32	98.89 %		
Pangkatan Estate	3,640	110.91	585.09	4,336.00	83.95 %		
Total	7,498	117.48	621.52	8,237.32	91.42%		

6. Plantings & Cycle							
Fatata		Ag	ge (Years)			Mature Immat	Toronostrono
Estate	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		Immature
Tanjung Selamat Estate		3,858	-	-	-	3,858	
Pangkatan Estate	2,005	1,635				1,635	2,005
Total (ha)	2,005	5,493				5,493	2,005
Note:			•				



7. Certified Tonnage of FFB (Own Certified Scope)							
	Tonnage / year						
Estate	Estimated (<i>May 2019 - Aug 2021</i>)	Actı (May 2019 – Ja		Forecast (<i>Sept 2021 – Aug 2022</i>)			
		Previous license period (May 19 – Apr 20)	Current license period (May 20 – Jan 21)				
Tanjung Selamat Estate	81,284	85,087.90	68,118.07	102,490			
Pangkatan Estate	26,529	23,538.67	19,529.70	44,317			
Total 231,339.78* 196,274.34				146,807			

Note:

Volume include certified volume (107,813mt) + total extended volume (123,517.78mt). Please note the volume in respected estate does not add up to 231,339.78mt due to at the time of volume extension request, it was not distinguished by estate.

8. Certified Tonnage of FFB (from other certified unit(s))							
	Tonnage / year						
Estate	Estate		ual anuary 2021)	Forecast (<i>Sept 2021 – Aug 2022</i>)			
	N/A	Previous license period (May 19 – Apr 20)	Current license period (May 20 – Jan 21)	N/A			
N/A							
Total							
Note:							

9. Non-Certified Tonnage of FFB (outside supplier — excluded from certificate)						
Indonesiant FFR	Tonnage / year					
Independent FFB Supplier	Estimated (May 2019 -Aug 2021)	Acti (May 2019 – Ja		Forecast (<i>Sept 2021 – Aug 2022</i>)		
		Previous license period (May 19 – Apr 20)	Current license period (May 20 – Jan 21)			
Third Party Supplier	127,550	103,057	55,529	96,000		
Total	127,550	158,	586	96,000		
Note:						



	Estimated (<i>May 2019 – Aug 2021</i>)		Actual (May 2019 – January 2021)		
		Previous license period (May 19 – Apr 20)	Current license period (May 20 – Jan 21)		
	FFB	FFB	FFB		
	231,339.78*	108,626	87,648	146,807	
Mill Canacity:		196,2			
Capacity: 45 MT/hr	CPO (OER: 18.80%)	CPO (OER: 20.41 %	CPO (OER: 21.09%)		
	43,747.97**	22,271.53	17,803.84	30,968	
		40,075.37			
	PK (KER: 4.95%)	PK (KER: 4.34%)		PK (KER: 4.55%)	
	10,965.28***	4,925.56	3,595.42	6,680	
		8,520).98		

Note:

- * Volume include certified volume (107,813mt) + total extended volume (123,517.78mt)
- ** Volume include certified volume (20,269mt) + total extended volume (23,478.97mt)
- *** Volume include certified volume (5,337mt) + total extended volume (5,628.28mt)

11. Actual Sold Volume (CPO) Current License period (May 2020 - Jan 2021) **Other Schemes Certified RSPO Certified** Conventional **Total ISCC Others** CPO (MT) 4,870.51 0 0 12,528.62 17,399.13 Previous License period (May 2019 - Apr 2020) CPO (MT) 0 22,091.49 0 0 22,091.49 Note: 550 RSPO Credits sold



12. Actual Sold Volume (PK)									
Current Lice	Current License period (May 2020 – Jan 2021)								
	DCDO Contified	Other Schen	nes Certified	Conventional	Total				
	RSPO Certified	ISCC	Others	Conventional	Total				
PK (MT)	3,577.21	0	0	0	3,577.21				
Previous Lic	Previous License period (May 2019 – April 2020)								
PK (MT)	4,789.84				4,789.84				

13. Independent Smallholders Certification Claims							
	Credit	Physical Volume (MT)					
IS-CSPO							
IS-CSPKO							
IS-CSPKE							



Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn. Bhd. (ASI Accreditation Number: ASI-ACC-067) Suite 29.01 Level 29, The Gardens North Tower, Mid Valley City, Lingkaran Syed Putra, 59200 Kuala Lumpur, Malaysia.
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BSI is a leading global provider of management systems assessment and certification, with more than 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 **22 – 27 February 2021**. The audit programme is included as Section 2.3. Due to the COVID-19 pandemic, this assessment involved a partial remote audit as allowed by RSPO Secretariat – RSPO P&C On-site & Remote Audits dated 24th March 2020. The remote audit was conducted on **10 – 11 June 2020**.

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, Indonesia National Interpretation 2020 for the Production of Sustainable Palm Oil 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. Stakeholder notification has been made on 9th February 2021 and uploaded in the RSPO website https://www.rspo.org/certification/public-announcement

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 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

Assessment Program									
Name (Mill / Supply Base)	Year 1 (Certification)	Year 2 (ASA 1)	Year 3 (ASA 2)	Year 4 (ASA 3)	Year 5 (ASA 4)				
Tanjung Selamat Mill	X	Х	X	X	X				
Tanjung Selamat Estate	X	X	X	X	X				
Pangkatan Estate	X	X	X	X	X				

Tentative Date of Next Visit: May 2, 2022 - May 6, 2022

Total No. of Mandays: 26



2.2 BSI Assessment Team:

Team Member Name	Role	Qualifications
Mujinius Jalaraya	Team Leader	Holds Bachelor Degree in Forest Resources Conservation and Ecotourism from Faculty of Forestry, Bogor Agricultural University (IPB). He has working experience in palm oil plantations as SHE Assistant at PT. Astra Agro Lestari Tbk in 2008 - 2012 and as Sustainability Supervisor at Teladan Prima Group in 2012 – 2014. He had involved in RSPO certification since 2014 as a team member subsequently as a Lead Auditor. He has completed ISO 9001 Lead Auditor course, ISPO Lead Auditor course, RSPO endorsed P&C Lead Auditor course, RSPO endorsed SCCS Lead Auditor course, HCV Identification and management, ISO 14001 Internal Auditor course, ISO 45000 Lead Auditor course, Training for Trainers and OHS Expert Training. He is fluent in English and Bahasa Indonesia. During this audit, he audited the aspects of HCV management and monitoring, supply chain for mill, partial certification and timebound plan.
Edy Widodo	Team member	Holds a Bachelor Degree in Agriculture Technology from the Faculty of Agriculture, Department of Agricultural Technology, University of Padjadjaran, Bandung. His working experience includes as an Assistant Estates Manager with PT SMART Tbk. From 1999 to 2005. He has working experience in the industrial sector and audit Plantation and also the processing industry and agricultural mechanization. He is Lead Auditor for ISO 9001: 2008 and an approved ISPO auditor by the ISPO Commission, Ministry of Agriculture of Indonesia on February 2013. He has completed Understanding ISO 14001: 2004 & Auditing ISO 14001: 2004 training, RSPO endorsed P&C Lead Auditor course, RSPO endorsed RSPO Supply Chain Certification lead auditor Course, High Conservation Value (HCV) Training and SMETA requirement training. He is fluent in English and Bahasa Indonesia. During this audit, he audited the aspects of transparency, company policy, social and labor.
Andi Pratama Pasaribu	Team member	Holds a Bachelor Degree in Social Economy. He has more than 5 years work experiences as the operational staff since 2008 and auditing Sustainability Palm Oil scheme covering best management practices, land legality, environmental, social and worker welfare aspect and supply chain elements. He has completed Indonesian Sustainable Palm Oil (ISPO) Lead Auditor course held by the ISPO Commission, RSPO endorsed P&C Lead Auditor course by Proforest and Daemeter in 2016, High Conservation Value (HCV) Training, ISO 9001 Lead Auditor course, ISO 14001 Lead Auditor course, RSPO endorsed SCCS Lead Auditor course and OHSAS Auditor course. He is fluent in English and Bahasa Indonesia. During this audit, he audited legal aspect and best management practices aspect for mill and estate.
Eko Purwanto	Team member	Holds a Bachelor of Forestry from Forest Conservation Department, Faculty of Forestry, Bogor Agricultural University (IPB). He has work experience as Estate Manager of a Oil Palm Plantation in East Kalimantan from 2003 to 2012. He has experience for implementing good agricultural practice including integrated pest management and limiting pesticides uses. He has auditing experience in ISO 9001, ISPO, RSPO P&C and RSPO SCC. He has completed ISO 9001 Lead Auditor course, ISO 14001 Lead Auditor course, ISPO Lead Auditor course, RSPO endorsed P&C Lead Auditor course, RSPO

...making excellence a habit."



		endorsed SCCS Lead Auditor course, Introduction to HCV Toolkit HCV (2011), High Conservation Value (HCV) Training and SMETA requirement training. He is fluent in English and Bahasa Indonesia. During this audit, he audited the aspects of Agronomy and Mill Best Management Practise, Supply chain, organisation management plan and continual improvement.
Suhaili Sahari	Peer Reviewer	He holds a Bachelor Degree in Science majoring Industrial Chemistry from Liverpool University. He holds a Master Degree in Business Administration from Multimedia University, Malaysia. He holds a PhD in Economics & Muamalat from University Science Islam Malaysia. He has more than 25 years' experience in training, teaching, consulting, quality and production for both manufacturing and plantation operation as well as education industry. He has experience conducting ISO, HACCP, Euro GAP, GLOBALG.A.P., RSPO, MSPO, Environment and Food Safety audits. He has completed RSPO Endorsed RSPO P&C Lead Auditor Course and RSPO/ASI Peer reviewer training.

Accompanying Persons: Nil

2.3 Assessment Plan

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

Remote Assessment Plan:

Date	Time	Subjects	MJ	EP	EW	ICT Planned
Wednesday, 10/06/2020	08.00 - 08.30	Opening Meeting Opening Presentation by Audit team leader. Confirmation of assessment scope and finalize Audit plan	√	√	√	Video conference with Zoom Meeting
	08.30 - 12.00	Document Review and verification, Interview with Auditee Criterion 1.1: The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making. Criterion 1.1.1 (C); Criterion 1.1.3 (C); Criterion 1.1.4 (C); Criterion 1.1.5 Criterion 1.2: The unit of certification commits to ethical conduct in all business operations and transactions. Criterion 1.2.1; Criterion 1.2.2 Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations. Criterion 2.1.1 Criterion 2.2 All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements Criterion 2.2.2; Criterion 2.2.3 Criterion 3.5 A system for managing human resources is in place. Criterion 3.5.1			√	Video conference with Zoom Meeting, Document review through Email/ Whatsapp/ Google Drive/Zoom meeting share doc.



	Criterion 3.7 All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.			
	Criterion 3.7.1 (C); Criterion 3.7.2			
	Criterion 4.1: The unit of certification respects human rights,			
	which includes respecting the rights of Human Rights			
	Defenders Othering 4.1.1 (C)			
	Criterion 4.1.1 (C)			
	Criterion 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.			
	Criterion 4.2.1 (C); Criterion 4.2.2; Criterion 4.2.3; Criterion 4.2.4			
	Criterion 2.3 All FFB supplies from outside the unit of certification are from legal sources.		√	
	Criterion 2.3.1			
	Criterion 3.1 There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability			
	Criterion 3.1.1; Criterion 3.1.2; Criterion 3.1.3			
	Criterion 3.2 The unit of certification regularly monitors and reviews their economic, social and environmental performance			
	and develops and implements action plans that allow demonstrable continuous improvement in key operations.			
	Criterion 3.2.1; Criterion 3.2.2			
	Criterion 3.3 Operating procedures are appropriately documented, consistently implemented and monitored.			
	Criterion 3.3.1; Criterion 3.3.3			
	Criterion 3.8 Supply Chain Requirements for Mills			
	Criterion 3.8.1; Criterion 3.8.2; Criterion 3.8.3; Criterion 3.8.4; Criterion 3.8.5; Criterion 3.8.6; Criterion 3.8.7; Criterion 3.8.8; Criterion 3.8.9; Criterion 3.8.10; Criterion 3.8.11; Criterion 3.8.12; Criterion 3.8.13; Criterion 3.8.14; Criterion 3.8.15; Criterion 3.8.16; Criterion 3.8.17			
	Criterion 7.1: IPM plans are implemented and monitored to ensure effective pest control.			
	Criterion 7.1.1 (C); Criterion 7.1.2			
	Criterion 3.4 A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.	√		
	Criterion 3.4.1 (C); Criterion 3.4.2; Criterion 3.4.3 (C)			
	Criterion 3.6 An Occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
	Criterion 3.6.1 (C)			
	Criterion 6.4: Children are not employed or exploited.			
	Criterion 6.4.1; Criterion 6.4.2 (C)			
	Criterion 6.5: Policies and procedures in place to protect workers rights.			
	Criterion 6.5.1 (C); Criterion 6.5.2 (C)			



	12.00 - 14.00 - 14.00 - 17.00	Criterion 6.6: Work is voluntary and specific labor policy and procedures are implemented. Criterion 6.6.1 (C); Criterion 6.6.2 (C) Criterion 6.7: Appropriate health and safety measures are in place. Criterion 6.7.1 (C); Criterion 6.7.2; Criterion 6.7.5 Break Continue Document Review and Verification, Interview	√ √	√ √	√ √	
Thursday, 11/06/2020	08.00 - 12.00	Document Review and Verification, Interview Criterion 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent. Criterion 4.4.1 (C); Criterion 4.4.3 (C) Criterion 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses Criterion 5.1.1; Criterion 5.1.5; Criterion 5.1.6 (C); Criterion 5.1.7; Criterion 5.1.9 (C) Criterion 6.1: Any form of discrimination is prohibited. Criterion 6.1.1 (C); Criterion 6.1.3; Criterion 6.1.5 (C); Criterion 6.1.6 Criterion 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW) Criterion 6.2.1 (C); Criterion 6.2.2 (C); Criterion 6.2.3 (C); Criterion 6.2.6 Criterion 6.3: The unit of certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel Criterion 6.3.1 (C)			√	Video conference with Zoom Meeting, Document review through Email/ Whatsapp/ Google Drive/Zoom meeting share doc.
		Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment. Criterion 7.2.1 (C); Criterion 7.2.5; Criterion 7.2.6 (C); Criterion 7.2.9 (C) Criterion 7.4: Practice maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield. Criterion 7.4.1; Criterion 7.4.2; Criterion 7.4.3 Criterion 7.5: Practices minimise and control erosion and degradation of soils Criterion 7.5.1 (C) Criterion 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.		√		



	Criterion 7.6.1 (C) Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly. Criterion 7.7.1 (C); Criterion 7.7.2; Criterion 7.7.3; Criterion 7.7.4; Criterion 7.7.5				
	Criterion 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner Criterion 7.3.1 Criterion 7.8: Practices maintain the quality and availability of surface and groundwater. Criterion 7.8.1 (C); Criterion 7.8.3; Criterion 7.8.4 Criterion 7.9: Efficiency of fossil fuel use and the use of renewal energy is optimized. Criterion 7.9.1 Criterion 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions Criterion 7.10.1 (C); Criterion 7.10.2 (C); Criterion 7.10.3 (C) Criterion 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS)forest. HCVs and HCS forests in the managed area are identified and protected or enhanced. Criterion 7.12.1 (C); Criterion 7.12.2 (C); Criterion 7.12.2 b);	√			
12.00 -	Criterion 7.12.4 (C); Criterion 7.12.6; Criterion 7.12.8 (C) Preparation for Closing Meeting	√	√	√	
13.00	rieparation for Closing Meeting	V	v	V	
14.00 - 15.00	Closing Meeting	√	√	√	

Note: MJ: Mujinius Jalaraya, EW: Edy Widodo, EP: Eko Purwanto

Onsite Assessment Plan:

Date	Time	Subjects	MJ	EW	EP	AP
Monday	07.45 – 09.20	Flight Jakarta – Pekanbaru	√	√	√	√
22/02/2021	09.30 - 13.30	Travel from Pekanbaru to PT Indo Sepadan Jaya	√	√	√	√
	13.30 – 14.00	Break	√	√	√	√
	14.00 – 14.30	Opening Meeting	√	√	√	√
		Presentation by PT. ISJ — Tanjung Selamat POM & Supply bases Presentation by BSI Indonesia				
	14.30 – 17.00	Document Review	√	√	√	√
		Tanjung Selamat POM:				
		- Occupational Health and Safety, HCV, Environment Aspect, time bound plan.				



		- Social Aspect and workers welfare, worker consultation, Stakeholder Consultation, impact assessments, policies.				
		- Best Management Practice for Mill and supply chain for mill.				
		- Operation Procedure, organization commitments, Legal compliance, continuous improvement, long term business plan.				
Tuesday	08.00 - 12.00	Field Visit to Tanjung Selamat Estate:	√	√	√	√
23/02/2021		 Herbicide application programmes, harvesting, fertilizing operations, water management, road maintenance, terracing, HCV's, riparian zones, etc. 				
		- Agrochemical stores, Fertilizer store, workshops, housing, landfill, clinic, riparian zones, Hazardous Waste, waste management, etc.				
		- Boundaries inspection, worker interviews, social amenities, etc.				
		- Interview with: Labour Union and Gender Committee.				
	08.00 - 12.00	Stakeholder consultation:		\checkmark		
		Local government of Pelalawan Regency (DLH, Disbun, Dinsakertrans & BPN), Village head, surrounding community, NGO.				
	12.00 – 14.00	Break	√	√	\checkmark	√
	14.00 – 17.00	Audit continue for Field visit and Document Review for Tanjung Selamat Estate	√	√	√	√
Wednesday	08.00 - 12.00	Field Visit to Tanjung Selamat POM:	√	√	√	√
24/02/2021		 Inspection of processing, warehouse, workshop, mill wastes management, Effluent Ponds, OHS, Environment issues, POME application, workers interview, Supply chain for CPO mill, Review on SEIA documents and records, Document review, etc. 				
		- Audit Supply Chain for CPO Mills (RSPO SCCS)				
		- Interview workers.				
	12.00 – 14.00	Break	√	\checkmark	√	√
	14.00 – 17.00	Audit continue for Document Review Tanjung Selamat POM & Estate	√	√	√	√
Thursday	08.00 - 12.00	Field Visit to Pangkatan Estate:	√	\checkmark	√	√
25/02/2021		 Herbicide application programmes, harvesting, fertilizing operations, water management, road maintenance, terracing, HCV's, riparian zones, etc. 				
		- Agrochemical stores, Fertilizer store, workshops, housing, landfill, clinic, riparian zones, Hazardous Waste, waste management, etc.				
		Boundaries inspection, worker interviews, social amenities, etc.Interview with workers				
	12.00 – 14.00	Break	√	√	√	√
	14.00 – 17.00	Audit continue for Field visit and Document review for Pangkatan Estate	√	√	√	√



Friday, 26/02/2021	08.00 – 12.00	Audit continue for Document Review Tanjung Selamat POM, Tanjung Selamat Estate and Pangkatan Estate.		√	√	√
	12.00 – 14.00	Break	√	√	\checkmark	√
	14.00 – 17.00	Audit Continue	√	√	√	√
Saturday,	08.00 - 09.00	Report Preparation	√	√	√	√
27/02/2021	09.00 - 10.00	Closing Meeting	√	√	√	√
	10.00 – 14.00	Travel from PT Indo Sepadan Jaya - Pekanbaru	√	√	√	√

Note: MJ: Mujinius Jalaraya, EW: Edy Widodo, EP: Eko Purwanto, AP: Andi Pratama Pasaribu



Section 3: Assessment Findings

3.1 Normative requirement applied for this assessment:

🖂 PT Inti Indosawit Subur Multiple Manageme	ent Units / Time Bound Plan
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- ☐ 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

Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company? Have all the estates and mills certified within five (5) years after obtaining RSPO membership? There is remaining mill and estate that has not certified yet as below: 1. PT Mitra Unggul Pusaka - Segati Palm Oil and its supply bases: Segati Estate & Gondai Estate; Penarikan Palm Oil Mill and its supply bases: Penarikan Estate located in Pelalawan, Riau.PT Mitra Unggul Pusaka - Segati Mill and Penarikan Mill and its supply bases. The unit has gone through the RSPO Stage 2 certification audit in 2014, however it was not succeed because there are plantings carried out after November 2005 and 2010 which must go through the NPP and RaCP processes completed prior to certification. The company's sustainability team has conducted latest RSPO internal audit on December 2020.PT Mitra Unggul Pusakawill planned Re-Audit after RaCP process completed and concept note approved by RSPO, estimated in year 2022. Status of disclosure and NPP T MUP has been submitted to RSPO by email since 29 November 2017. The latest email correspondences from RSPO dated 3 December 2020 confirmed that the concept note draft has been submitted by PT MUP, concept note were still under review by RSPO and there was a comments from RSPO to be followed up by company to improved for	Requirement	Assessment	Compliance
as below: 1. PT Mitra Unggul Pusaka - Segati Palm Oil and its supply bases: Segati Estate & Gondai Estate; Penarikan Palm Oil Mill and its supply bases: Penarikan Estate located in Pelalawan, Riau.PT Mitra Unggul Pusaka – Segati Mill and Penarikan Mill and its supply bases. The unit has gone through the RSPO Stage 2 certification audit in 2014, however it was not succeed because there are plantings carried out after November 2005 and 2010 which must go through the NPP and RaCP processes completed prior to certification. The company's sustainability team has conducted latest RSPO internal audit on December 2020.PT Mitra Unggul Pusakawill planned Re-Audit after RaCP process completed and concept note approved by RSPO, estimated in year 2022. Status of disclosure and NPP PT MUP has been submitted to RSPO by email since 29 November 2017. The latest email correspondences from RSPO dated 3 December 2020 confirmed that the concept note draft has been submitted by PT MUP, concept note were still under review by RSPO and there was a comments from	current subsidiaries, estates and mills that is under the control and/or minor	for all of its subsidiaries; indicating all palm oil mills, company-owned estates and scheme smallholder as the	Complied.
resubmission on clarity and precision of the content. PT MUP has reply the email by 6 May 2021 to RSPO for submission the revise of Concept Note and response for RSPO Comment; also attach the supporting document as part of Concept Note. 2. Bahilang Estate (PT Nusa Pusaka Kencana/NPK). RaCP still under Process. Certification audit will be planed on	within five (5) years after obtaining	 as below: PT Mitra Unggul Pusaka - Segati Palm Oil and its supply bases: Segati Estate & Gondai Estate; Penarikan Palm Oil Mill and its supply bases: Penarikan Estate located in Pelalawan, Riau.PT Mitra Unggul Pusaka – Segati Mill and Penarikan Mill and its supply bases. The unit has gone through the RSPO Stage 2 certification audit in 2014, however it was not succeed because there are plantings carried out after November 2005 and 2010 which must go through the NPP and RaCP processes completed prior to certification. The company's sustainability team has conducted latest RSPO internal audit on December 2020.PT Mitra Unggul Pusakawill planned Re-Audit after RaCP process completed and concept note approved by RSPO, estimated in year 2022. Status of disclosure and NPP PT MUP has been submitted to RSPO by email since 29 November 2017. The latest email correspondences from RSPO dated 3 December 2020 confirmed that the concept note draft has been submitted by PT MUP, concept note were still under review by RSPO and there was a comments from RSPO to be followed up by company to improved for resubmission on clarity and precision of the content. PT MUP has reply the email by 6 May 2021 to RSPO for submission the revise of Concept Note and response for RSPO Comment; also attach the supporting document as part of Concept Note. Bahilang Estate (PT Nusa Pusaka Kencana/NPK). RaCP 	Complied



 2022. According to email correspondence with RSPO and PT NPK Bahilang Estate dated 26 July 2021, LUCA has been sent by company and acknowledge document receipt by RSPO, LUCA has been placed in the queue. Sentral Estate (PT Gunung Melayu). RaCP still under Process. Certification audit will be planed on 2022. LUCA submission has been sent on 28 Dec 2020, latest update from RSPO email dated 18 March 2021 to company, LUCA still under review and report needs clarification and still follow up by company. Teluk Panji Estate. HGU for this unit has not been obtained and still under process. Certification audit will be planed on 2022. Latest updated July 2021, HGU still under process in Padan Portanghan Nacional. 	
Group liabilities for the certification unit been checked against from RSPO website.	
No, there is no new acquisition conducted by PT Inti Indosawit Subur and its subsidiary.	Complied
No deviations	Complied
 Yes, there is time bound plan revision dated 1 July 2021, signed by Management Representative. Justification available: 1. PT Mitra Unggul Pusaka - Segati Palm Oil and its supply bases: Segati Estate & Gondai Estate; Penarikan Palm Oil Mill and its supply bases: Penarikan Estate located in Pelalawan, Riau. RaCP still under process of concept note review by RSPO. Certification audit will be planed on 2022 2. Bahilang Estate (PT). RaCP still under Process. Certification audit will be planed on 2022. 3. Sentral Estate (PT Gunung Melayu). RaCP still under Process. Certification audit will be planed on 2022. 4. Teluk Panji Estate. HGU has not been obtained and still under process on government side. Certification audit will be planed on 2022. Timeboundplan revision has been consistent with ACOP reporting. 	Complied
There is no any isolated lapses in implementation of the plan. There are the changing on the plan due to the process of RaCP for PT Mitra Unggul Pusaka, Bahilang Estate and Sentral Estate and HGU issuance process for Teluk Panji Estate.	Complied
	and PT NPK Baħilang Estate dated 26 July 2021, LUCA has been sent by company and acknowledge document receipt by RSPO, LUCA has been placed in the queue. 3. Sentral Estate (PT Gunung Melayu). RaCP still under Process. Certification audit will be planed on 2022. LUCA submission has been sent on 28 Dec 2020, latest update from RSPO email dated 18 March 2021 to company, LUCA still under review and report needs clarification and still follow up by company. 4. Teluk Panji Estate. HGU for this unit has not been obtained and still under process. Certification audit will be planed on 2022. Latest updated July 2021, HGU still under process in Badan Pertanahan Nasional. Group liabilities for the certification unit been checked against from RSPO website. No, there is no new acquisition conducted by PT Inti Indosawit Subur and its subsidiary. Yes, there is time bound plan revision dated 1 July 2021, signed by Management Representative. Justification available: 1. PT Mitra Unggul Pusaka - Segati Palm Oil and its supply bases: Segati Estate & Gondai Estate; Penarikan Palm Oil Mill and its supply bases: Penarikan Estate located in Pelalawan, Riau. RaCP still under process of concept note review by RSPO. Certification audit will be planed on 2022. 2. Bahilang Estate (PT). RaCP still under Process. Certification audit will be planed on 2022. 3. Sentral Estate (PT Gunung Melayu). RaCP still under Process. Certification audit will be planed on 2022. 4. Teluk Panji Estate. HGU has not been obtained and still under process on government side. Certification audit will be planed on 2022. Timeboundplan revision has been consistent with ACOP reporting. There is no any isolated lapses in implementation of the plan. There are the changing on the plan due to the process of RaCP for PT Mitra Unggul Pusaka, Bahilang Estate and Sentral Estate and HGU issuance process for Teluk Panji



Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised	There is no fundamental failure to proceed with implementation of the plan. Company has taken action to proceed all uncertified unit to complete the RaCP and to obtained the HGU for Teluk Panji Estate.	Complied
Un-Certified Units or Holdings		
No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12.	According to Land Use change analysis, there are several area conversion from rubber plantation to become palm oil plantation in PT Mitra Unggul Pusaka, cacao plantation in Bahilang Estate and Sentral Estate, no primary forest. Latest progress of RaCP PT Mitra Unggul Pusaka based on email correspondence between company and RSPO dated 3 December 2020, confirmed that RSPO has review the concept note and there is a comment to be improved and company has give the feedback and revision of Concept Note on 6 May 2021 and waiting for the review from RSPO secretariat. Bahilang Estate (PT Nusa Pusaka Kencana/NPK). RaCP still	Complied
	under Process. Certification audit will be planed on 2022. According to email correspondence with RSPO and PT NPK Bahilang Estate dated 26 July 2021, LUCA has been sent by company and acknowledge document receipt by RSPO, LUCA has been placed in the queue.	
	Sentral Estate (PT Gunung Melayu). RaCP still under Process. Certification audit will be planed on 2022. LUCA submission has been sent on 28 Dec 2020, latest update from RSPO email dated 18 March 2021 to company, LUCA still under review and report needs clarification and still follow up by company.	
	Teluk Panji Estate. HGU for this unit has not been obtained and still under process. Certification audit will be planed on 2022. Latest updated July 2021, HGU still under process in Badan Pertanahan Nasional.	
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	PT Mitra Unggul Pusaka – Segati Mill, PT NPK Bahilang Estate and Sentral Estate RaCP and relevant issues are still in progress and waiting for RSPO feedback. According to Land Use change analysis, there are several area conversion from rubber plantation to become palm oil plantationin PT Mitra Unggul Pusaka, cacao plantation in Bahilang Estate and Sentral Estate no primary forest.	Complied
	Latest progress of RaCP PT Mitra Unggul Pusaka based on email correspondence between company and RSPO dated 3 December 2020, confirmed that RSPO has review the concept note and there is a comment to be improved and company has give the feedback and revision of Concept Note on 6 May 2021 and waiting for the review from RSPO secretariat.	



Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.	According to internal audit result on December 2020, there is no land conflict occur in PT Mitra Unggul Pusaka – Segati Mill. In addition the company has been certified for ISPO (Indonesian Sustainable Palm Oil) since December 2016.	Complied
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	According to internal audit result on December 2020, there is no Labor disputes occur in PT Mitra Unggul Pusaka – Segati Mill. In addition the company has been certified for ISPO (Indonesian Sustainable Palm Oil) since December 2016.	Complied
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	According to internal audit result on December 2020, there is no legal non compliance occur in PT Mitra Unggul Pusaka – Segati Mill. In addition the company has been certified for ISPO (Indonesian Sustainable Palm Oil) since December 2016.	Complied
Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.	PT Mitra Unggul Pusaka – Segati Mill conduct the internal audit each year. Latest internal audit on December 2020. Report of internal audit are available. Internal audit covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12. Positive assurance statement by internal audit team are available: There is no land conflict occur, no labor disputes occur, no legal non compliance, HCV monitoring and management well implemented.	Complied
Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?	PT Mitra Unggul Pusaka – Segati Mill RaCP and relevant issues are still in progress and waiting for RSPO feedback. According to Land Use change analysis, there are several area conversion from rubber plantation to become palm oil plantation, no primary forest. Latest progress of RaCP based on email correspondence between company and RSPO dated 3 December 2020, confirmed that RSPO has review the concept note and there is a comment to be improved and company has give the feedback and revision of Concept Note on 6 May 2021 and waiting for the review from RSPO secretariat.	Complied
Have there been any stakeholder (including NGO) consultation conducted?	According to internal audit result on December 2020, there is no land conflict occur in PT Mitra Unggul Pusaka – Segati Mill. In addition the company has been certified for ISPO (Indonesian Sustainable Palm Oil) since December 2016.	Complied

3.3 Progress of scheme smallholders and/or outgrowers

Progress of scheme smallholders or outgrowers towards compliance with relevant standards				
Requirement	Remarks	Compliance		
Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification?		Complied		



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.	

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 4 Critical and 4 Minor nonconformities raised.

Non-conformity				
NCR Ref #	1921605-202006-M1	Clause & Category (Critical (Major) / Minor)	RSPO INA-NI 2020 Indicator 2.3.1 Critical	
Date Issued	11 June 2020	Due Date	10 August 2020	
Closed (Yes / No)	Yes	Date of nonconformity Closure	6 August 2020	
Statement of Nonconformity:	 Certificate holder cannot demonstrate the evidence of: Ownership status, right/claim of the land by grower/smallholder; If relevant, valid planting/operational/trading license, or is part of a cooperative which allows the buying and selling of FFB. 			
Requirement Reference:	 (C) For all directly sourced FFB, Palm Oil Mill (POM) requires: Information regarding the geolocation of FFB origins; Proof of ownership status, right/claim of the land by grower/smallholder; If relevant, valid planting/operational/trading license, or is part of a cooperative which allows the buying and selling of FFB. 			
Objective Evidence:	PT Indo Sepadan Jaya are received FFB from another source/grower & smallholder such as UD Sahabat (FFB Colector) and Bumdes Tebing Tinggi Pangkatan Sejahtera (CSV). However, company canot be demonstrated the evidence of: • Ownership status, right/claim of the land by grower/smallholder; • If relevant, valid planting/operational/trading license, or is part of a cooperative which allows the buying and selling of FFB.			
Corrections:	PT Indo Sepadan Jaya – Tanjun farmers/smallholder, agents and POM FFB. PT Indo Sepadan Jaya – Ownership status, right/clai – Valid operational/trading lic buying and selling of FFB. Below are the information collect – Trading licence "Tanda Da 2017, valid until 2 February – Sampled of land ownership 1. Land ownership Certific	collected for UD Sahabat (FFB Collector/Agent): nda Daftar Perusahaan No. 02292055101645 date 2 February		



	2. Land ownership Certificate (SHM) no. 3239 dated 15 October 2018 on behalf Bainah Siregar, issued by BPN Labuhan Batu Regency, land size 19,940 m².
	3. Land ownership Certificate (SHM) no. 3310 dated 17 October 2018 on behalf Mahmud Dasopang, issued by BPN Labuhan Batu Regency, land size 19,990 m ² .
	Below are the information collected for Bumdes Tebing Tinggi Pangkatan Sejahtera (CSV):
	- Trading licence "Surat Keterangan Usaha Nomor: 525/512/TTP/2019" dated 19 September 2019, Location: Village Tebing Tinggi Pangkatan, main business: FFB sales and purchase.
	- Sampled of land ownership status as a supply base of CSV Bumdes Tebing Tinggi:
	1. Land ownership statement Letter from Badan Pertanahan Nasional (BPN) Labuhan Batu Regency No. 54/2020 dated 28 February 2020, consist 0f 44 persil of land ownership. Sample seen: Persil No. 02.12.13.02.00607 on behalf Sukanti, size of land 19,980 m²; Persil No. 02.12.13.02.00621 on behalf Aziddin SE, size of land 8,345 m².
	 Land ownership statement Letter from Badan Pertanahan Nasional (BPN) Labuhan Batu Regency No. 36/2020 dated 26 February 2020, consist 0f 48 persil of land ownership. Sample seen: Persil No. 02.12.13.02.00586 on behalf Ida Eliawati, size of land 9,641 m²; Persil No. 02.12.13.02.00502 on behalf Lasmi, size of land 18,280 m².
Root Cause Analysis:	Most of the smallholders/FFB suppliers are not willing to provide complete information and have concerns about providing copies of documents related to land ownership or business permits.
Corrective Actions:	Creating a standard format and timeline progress for carrying out data collection related to the legality of land and business entities as suppliers of external FFB, as well as monitoring data updates and information on the legality of FFB Suppliers.
	PT Indo Sepadan Jaya has made the timeline to collected all the legality of the land ownership from each FFB suppliers (smallholder or agent or trader). The target was determine as November 2021 to collect all the information and data related to land legality and business entity of FFB supplier form Agent/Trader (indirect sources). This commitment has been signed by management of PT Indo Sepadan Jaya – Tanjung Selamat POM. For all direct sources FFB supplier from CSV (Bumdes Tebing Tinggi), PT Indo Sepadan Jaya has completed to collect the information of the business permit and land ownership status.
Assessment Conclusion:	PT Indo Sepadan Jaya has performing the correction and corrective action as above. Auditor has verifiy all the evidence document to fullfill the land ownership status of the land and business permit of FFB supplier. The company also has made the timeline to complete the information of land legality for the FFB Supplier from Agent/indirect sources with target November 2021. All information about direct sources of FFB supplier has been collected and completed. The NC has closed satisfactory on 6 August 2020.
	The He has closed satisfactory on a August 2020.

Non-conformity				
NCR Ref #	1921605-202006-M2	Clause & Category (Critical (Major) / Minor)	RSPO INA-NI 2020 Indicator 4.1.1 Critical	
Date Issued	11 June 2020	Due Date	10 August 2020	



Closed (Yes / No)	Yes	Date of nonconformity Closure	6 August 2020	
Statement of Nonconformity:	Company has established the Human Right Defender Policy and communicate to all workers, however the policy has not been communicated to supply chain actors and local communities.			
Requirement Reference:	(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, supply chain and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.			
Objective Evidence:	Company has established the policy of Human Right Defender as per "Memorandum No. 049/HO/MEMO/INT/03/20 tanggal 2 Maret 2020 Perihal Perlindungan terhadap Pelapor/Pembela Hak Asasi Manusia dari tindakan balas dendam, intimidasi dan pelecehan". The policy has been communicated to all level of workers, however it has not been communicated to supply chain actors and local communities according to RSPO standard.			
Corrections:	Conducting socialization and documenting attendance of the Human Right Defender Policy socialization to Contractors, Suppliers, Stakeholders / Stakeholders and the surrounding community. PT Indo Sepadan Jaya has conducted the socialization of Human Right Defender policy to Contractors, Suppliers, local community and Stakeholders on 8 July 2020 and 20 July 2020 (Tanjung Selamat POM, Tanjung Selamat Estate and Pangkatan Estate). Evidence of socialization can be demonstrated during NCR Close Out verification audit, such as: attendance list and photo documentation. Confirmation with sample contractor and suppliers confirmed that they have aware with company policy regarding Human Right Defender.			
Root Cause Analysis:	Due to the Covid-19 Pandemic, t the new policy to internal partie interested parties affected since	es and has not had the opportu	unity to socialize it to all	
Corrective Actions:	Plan to refresh the socialization of company policies periodically to stakeholders/interested parties and to all new contractors or suppliers. PT Indo Sepadan Jaya has made the plan for refreshment of socialization for company policies to all stakeholders each year, prioritized to inform if there is a change in policy and prioritized socialization to new stakeholders.			
Assessment Conclusion:	According to above correction and has made the effort to socialize Socialization has been perform demonstrated. Company also had The NC has closed satisfactory or some content of the NC has closed	the policy of Human Right Defe ned on July 2020. Evidence s made the plan to refresh the s	ender to all stakeholders. of socialization can be	

Non-conformity			
NCR Ref #	1921605-202006-M3	Clause & Category (Critical (Major) / Minor)	RSPO INA-NI 2020 Indicator 6.6.2 Critical
Date Issued	11 June 2020	Due Date	10 August 2020



Closed (Yes / No)	Yes	Date of nonconformity Closure	6 August 2020
Statement of Nonconformity:	Certificate holder canot be demonstrated that specific labour procedure are established regarding temporary workers/PHL (Specified Time Work Agreement/PKWT).		
Requirement Reference:	(C) Where temporary (Specified Time Work Agreement/PKWT) or migrant workers are employed, a specific labour policy and procedures are established and evidence of implementation is available.		
Objective Evidence:	PT Indo Sepadan Jaya and PT Rantau Sinar karsa are employed PHL or PKWT for their operation, according to list of employee aproximately 100 workers of PHL/PKWT. However there is no specific procedure established regarding PHL/PKWT. Company has a procedure regarding labour as per "SOP AA-HR-305.2 – RO Rekrutmen"		
	dan Seleksi Karyawan, tanggal 1 regulate the PHL/PKWT.	February 2009". However the p	rocedure is not include or
Corrections:	PT Indo Sepadan Jaya – Tanjung Selamat POM and Estate and PT Rantau Sinar Karsa – Pangkatan Estate has issued the specific labour policy and procedures for temporary workers (PHL/PKWT); The policy and procedure are issued for each unit as below: - Tanjung Selamat POM: Memorandum No. 009/Mill-PTS/INT/07/2020 dated 24 July 2020.		
		morandum No. 171/ES-KTS/MEM	10/07/2020 dated 23 July
	- Pangkatan Estate: Memorandum No. 266/ MEMO/INT/07/2020 dated 01 July 2020.		
	The policy and procedure has been communicated to temporary workers at Tanjung Selamat POM on 25 July 2020, in Tanjung Selamat Estate on 3 August 2020 and in Pangkatan Estate on 4 July 2020. The procedure was explain the detail of mechanism for temporary workers recruitment, promotion of temporary workers to be permanent workers, term and condition and requirement of temporary workers in accordance with National regulation (UU No. 13 tahun 2003).		
Root Cause Analysis:	There has been no coordination between the sustainability department and the HR department in adjusting for updates/changes to the implementation of the RSPO INA NI 2020 principles and criteria, including updating procedures for PHL/PKWT.		
Corrective Actions:	PT Indo Sepadan Jaya will review the policy and procedure including the implementation of procedure periodically in coordination with Human resources Department. Sustainability team has made the coordination with HR department and Estate/Mill department to keep updated the policy and procedure according to relevant regulation. PT Indo Sepadan Jaya has made the timeline to socialize the Memorandum regarding the specific policy and procedure to all employee as per "Program Sosialisasi Memorandum PHL". The Memorandum will be updated as necessary inline with the relevant regulation.		
Assessment Conclusion:	According to above correction and corrective action, auditor conclude that company has implementing the correction and corrective action satisfactory to addressed the issue. PT Indo Sepadan Jaya has issued the specific policy and procedure as per "Memorandum" issued in each unit of Mill and Estate; Socialization its memorandum to temporary workers has been made and there is a programme to socialize the memorandum to all employee in coordination with HR Department, Mill/Estate Department and Sustainability Dept. The NC has closed satisfactory on 6 August 2020.		



Non-conformity			
NCR Ref #	1921605-202006-N1	Clause & Category (Critical (Major) / Minor)	RSPO INA-NI 2020 Indicator 7.1.2 Minor
Date Issued	11 June 2020	Due Date	Next Surveillance Assessment
Closed (Yes / No)	Yes	Date of nonconformity Closure	26 February 2021
Statement of Nonconformity:	Tanjung Selamat Estate and Pa which listed in the "Peraturan Me		
Requirement Reference:	Invasive species are not to be usualless plans to prevent and mon		
Objective Evidence:	Indonesia regulation has listed the invasive species and its management according to "Peraturan Menteri KLHK No. P. 94/MENLHK/SEKJEN/KUM.1/12/2016". However Tanjung Selamat Estate and Pangkatan Estate has not evaluated the invasive species which may exist in the plantation.		
Corrections:	Inventory and identify invasive species in the plantation unit according to the List listed in the regulation "Minister of Environment and Forestry Regulation No. P. 94 / MENLHK / SEKJEN / KUM.1 / 12/2016".		
Root Cause Analysis:	Evaluation of regulatory compliance has been carried out but the company has not made adjustments to comply with the 2020 INA NI standard.		
Corrective Actions:	Monitoring the invasive species in the plantation unit by making periodic monitoring reports in accordance with the regulation "Minister of Environment and Forestry Regulation No. P. 94 / MENLHK / SEKJEN / KUM.1 / 12/2016".		
Assessment Conclusion:	Inventory and identification of invasive species in the Tanjung Selamat and Pangkatan Estate has been done according to the List listed in the regulation "Minister of Environment and Forestry Regulation No. P.94/MENLHK/SEKJEN/KUM.1/12/2016".		
	The unit of certification has a list of existing invasive species and evaluate the status of control in certified area on 27 November 2020 in Tanjung Selamat Estate, on 4 November 2020 in Pangkatan Estate. Some species are naturally exist in the area and the spreading are controlled manually, e.g. Clidemia hirta, Imperata cylindica and Mikania micranta. The are no species in the list that used to manage areas in unit of certification.		
	Activity of inventory and identification of Invasive Species has been included into the Conservation Management Plan to be periodically carried out.		
	The NC has closed satisfactory on 26 February 2021.		

Non-conformity			
NCR Ref #	2049985-202101-M1	Clause & Category (Critical (Major) / Minor)	RSPO INA-NI 2020 Indicator 3.6.2 Critical
Date Issued	27 February 2021	Due Date	27 May 2020



Closed (Yes / No)	Yes	Date of nonconformity Closure	5 May 2021
Statement of Nonconformity:	It was found the inconsistency of implementation on the effectiveness of the H&S plan to address health and safety risks in the field.		
Requirement Reference:	(C) The effectiveness of the H8 monitored.	&S plan to address health and	safety risks to people is
Objective Evidence:	 During field visit at Pangkatan Estate it was found the unsafe condition: Broken excavator without track rail operated to move rock material; During field visit at Tanjung Selamat Estate Block B16M Afdeling 2: The door plate of the TUS transport truck was torn and could potentially injure the hand; During field visit to warehouse and Fire Fighter storage in Pangkatan Estate found several fire extinguisher APAR (5 APAR) was unusable but the inspection checklist showed good condition. At workshop Tanjung Selamat Estate It was found that the electric socket installation was damaged but there was still electricity and was not repaired. During field visit to Tanjung Selamat POM it was found that 3 Hydrant installation check were not well function and 2 of them were broken. However there is no follow up action on this. It was found in area of emergency shower of hazardous waste storage Tanjung Selamat POM, the faucet were broken and not well function. 		
	7. Log Out Tag out during maintenance machine/equipment in Tanjung Selamat POM were not implemented.		
Corrections:	 Perform repairs on damaged Excavator tracks so that they can function normally and can be used properly. Replace TUS car Truck with Car Truck in good condition. The old truck is written of and no longer use. Inspect all APAR Tubes in Pangkatan Estate and refill empty APARs accompanied by re-checking APAR tubes. Repairing immediately broken electrical terminals at workshop Tanjung Selamat Estate. Immediately make repairs to the damaged Hydrant. Immediately repair the emergency shower of hazardous waste storage Tanjung Selamat POM. LOTO procedure socialization to all factory workers/mechanics that it is mandatory to use LOTO when checking and repairing equipment. Managers and Assistants ensure that all workers install LOTO before making repairs in their area of responsibility. 		
Root Cause Analysis:	 The operator does not understand that the condition of the machine that is not in proper/ proper condition should not be operated. Lack of insight into understanding related to OHS and lack of control and monitoring from Field assistant. TUS (Spraying Unit Team) transport truck will already be written off so that no repairs will be made, while there is no replacement vehicle awaiting asset transfer from another unit. It is suspected that there is a tube leak because the APAR has only been filled for 6 months (usually it is refilled once a year). At the time of filling the fire extinguisher, the condition of the tube was not checked first so that no leaks were detected. 		



	4. Improper way of working by Traction personnel so that the plug is damaged. In addition there is no monitoring and concern for workshop personnel.
	5. Hydrants are rarely used because there are no emergency events, lack of hydrant maintenance and lack of monitoring hydrant functions because there is no special PIC appointed.
	6. Emergency showers are rarely used, so they are poorly monitored for the eyewash condition.
	7. Workers/mechanics are still not used to and don't really understand how to apply lotto in the work area.
Corrective Actions:	1. Issued the Memorandum regarding the prohibition of operating the damaged heavy equipment. Carry out routine monitoring of all heavy equipment working in the field to ensure the condition of the heavy equipment before it is operated. Ensure that all workers operate the heavy equipment correctly and the heavy equipment used is in proper condition.
	2. Coordination with the Estate Department related to the write off of TUS vehicles. Field assistant ensure that the TUS Truck is in good condition when operated.
	3. Check the condition of the APAR regularly every month and ensure that the condition of the APAR can be used properly.
	4. Monitoring the work area condition before working, put up posters calling for the correct use of electrical equipment and installing work instructions for the use of electric tools in the workshop area.
	5. Conduct regular monitoring every month and appoint a special PIC to carry out routine inspections and perform simulations on the function of the hydrant.
	6. Monitor eyewash regularly and schedule eyewash checks.
	 Monitoring the implementation of LOTO by field assistants and giving warnings to mechanics/employees if they do not apply LOTO when repairing and maintaining factory equipment.
Assessment Conclusion:	1. Pangkatan Estate has immediately repair the damaged Excavator tracks. According to "Berita Acara" dated 4 March 2021, confirmed that Excavator has been repaired and has well function. Management and field assistant has conduct the socialization on 8 March 2021 to all operator heavy equipment regarding the OHS aspect for operating heavy equipment. Estate management also has issued the Memorandum No. 124/MGR/INT/KPT/03/21 dated 8 March 2021 concering the Operating of equipment and work facility. In the memorandum stated that to enhance the consistency of OHS aspect implementation, all field assistant should check the working facility and equipment before operated; It was prohibit to use the damaged facility/equipment for work. The memorandum has been socialized to all field assistant. During interview with field assistant and heavy equipment operator confirmed that they have aware to regular check the condition of equipment/facility and ensuring that operator only operate the normal and proper equipment/facility.
	2. Tanjung Selamat Estate Management has immediately coordination with Estate Department to the write off the damaged TUS vehicles. Management has replace damaged TUS car Truck No. BK9439LG with another car Truck with good condition No. BK9884. The old truck is written of and no longer use. Head of workshop and traction (Asisten Traksi) has made the monitoring and routine maintenance programme for truck including TUS truck to ensure the proper condition of truck.
	3. Pangkatan Estate management has immediately Inspect all APAR Tubes in Pangkatan Estate and refill empty APARs accompanied by re-checking APAR tubes. Baed on "Berita"



Acara" dated 25r March 2021 confirmed that there are 11 APAR tubes are refill and recheck the tubes to check if there is a leak from the tubes. Refill and checking are condut by CV Cahaya Kencana. Company also has made the monthly monitoring checklist for APAR. Evidence of monthly APAR monitoring can be demonstrated during follow up audit. Sample seen on monitoring March 2021 and April 2021, confirmed that all APAR in good condition.

- 4. Tanjung Selamat Estate has immediately repairing broken electrical terminals at workshop and checking all the electrical equipment in workshop to ensure that there is no unsafe condition. Workshop Assistant also has install the signboard and working instruction to operate the electrical equipment to prevent the damaged and unsafe condition. Socialization and awareness also has been conducted by Workshop assistant. During follow up audit confirmed that the electrical terminals at workshop has been repaired and no other unsafe condition in workshop area; interview with workshop operator confirmed that they have aware regarding the standard of electrical equipment operation including unsafe condition prevention.
- 5. Tanjung Selamat POM has immediately make repairs to the damaged Hydrant. According to "Berita Acara" dated 26 February 2021 confirmed that Hydrant has been repaired. Hydrant test and simulation also has been performed on 27 February 2021 accroding to "Berita Acara" dated 27 February 2021. Based on hydrant test shown that Hydrant repaired has well function. Hydrant monitoring also has been done monthly by PIC appointed. Evidence of Hydrant monitoring can be demonstrated as per "Program pengecekan bulanan". Hydrant test are including nozel and hose, faucet, key, inspection card.
- 6. Tanjung Selamat POM has immediately repair the emergency shower of hazardous waste storage Tanjung Selamat POM. According to "Berita Acara dated 26 February 2021 confirmed that emergency shower has been repaired. Emergency shower test and simulation also has been performed on 27 February 2021 according to "Berita Acara" dated 27 February 2021. Based on test shown that emergency shower has well function. Hydrant monitoring also has been done monthly by PIC appointed. Evidence of emergency shower monitoring can be demonstrated as per "Program pengecekan bulanan".
- 7. Tanjung Selamat POM has conducted LOTO procedure socialization to all factory workers/mechanics. Socialization conducted on 7 April 2021, evidence of socialization are available. During follow up audit and interview with mechanic confirmed that they have aware and understand regarding the LOTO procedure. Managers and Assistants ensure that all workers install LOTO before making repairs in their area of responsibility. Monitoring form of LOTO usage and Job safety analysis for equipment maintenance and repairing can be demonstrated during audit.

The NC has closed satisfactory on 5 May 2021.

Non-conformity			
NCR Ref #	2049985-202101-N1	Clause & Category (Critical (Major) / Minor)	RSPO INA-NI 2020 Indicator 7.3.1 Minor
Date Issued	27 February 2021	Due Date	Next Assessment
Closed (Yes / No)	No	Date of nonconformity Closure	-



Statement of Nonconformity:	Company has determined a waste management plan includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics; However during audit still found the inconsistency of its implementation.
Requirement Reference:	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.
Objective Evidence:	1. During field visit to Pangkatan Estate Block D17N Afdeling IV it was found ex Polydor container dispose in to the land.
	2. During field visit to the emplacement (Main Camp) in Afdeling 3 Pangkatan Estate, it was found that used oil packages were disposed in the yard around the housing or not in their place according to established procedures.
	3. During field visit to Pangkatan Estate Landfill Afdeling 2 block B19e it was found many innerbag of fertilizer disposed in to the landfill; according to procedure it should be manage for reuse.
	4. It was found expired pesticide (Dithane more than 5 packs, expired on 15/08/2018) in the storage of Agrochemical Tanjung Selamat Estate and Pangkatan Estate. SOP Penanganan Limbah B3 No. AA-KL-06-EFP, dated 22 April 2016 stated that expired pesticide categorized as hazardous waste and manage as hazardous waste in temporary storage and deliver to licence vendor of hazardous waste.
	5. During filed visit to Tanjung Selamat POM found several ex chemical container used to accommodate the remaining oil on the fadpit and around WTP area, however according to procedure the ex chemical container should be manage as hazardous waste and store at the licenced hazardous waste storage.
	6. Flow meter for waste water discharge in POME outlet was not function well.
Corrections:	1. Immediately transfer the used Pollydor chemical packaging to the Temporary hazardous waste storage and update the balance and logbook.
	Disseminate the SOP for the hazardous waste handling particularly for used chemicals/ex chemical container to employees and personnel who are responsible for managing pesticides.
	2. Immediately transfer the used oil packages to the Temporary hazardous waste storage and update the balance and logbook.
	Disseminate the SOP for the hazardous waste handling particularly for used oil packages and chemicals/ex chemical container to employees.
	3. Immediately take the innerbag that is in the landfill and transfer it to the innerbag collection warehouse;
	Socialization to warehouse PIC and assistant/field foreman related to Innerbag waste management.
	4. Putting used chemical containers (bluechem) in the factory work area into the Temporary hazardous waste storage;
	Provide container containers that are not used chemical packaging;
	5. Send samples of expired chemicals to RnD for testing and analysis. Coordinate with the Rnd team the test results, whether to be reused or immediately written off or destroyed as waste.
	6. Immediately repair the clogged flow meter pipe.



Root Cause Analysis:	1. There are Pollydor chemical mixing activities in the field and the lack of supervision from field assistants regarding procedures for mixing pesticides and managing used packaging.
	2. Employees reuse used oil containers as containers/trash cans in housing. Lack of employee understanding regarding Procedure hazardous waste management.
	3. Employees do not understand the SOP for the management and handling of Innerbag waste and there is no supervision from field assistants in the management of Innerbag waste.
	4. There is no chemical expiration monitoring in the warehouse and dithane is a chemical that is rarely used. Lack of understanding of warehouse personnel and KTU regarding hazardous waste criteria and handling procedures.
	5. Lack of storage containers resulting in the use of used chemical jerry cans (bluechem) in the work area. Employees do not understand that bluechem jerry cans/used chemicals should not be used for the purpose of storing CPO residues/sludge.
	6. There is a drain hole where the connector pipe to the flowmeter is clogged so that the tool cannot detect the measurement of wastewater discharge. It is also poorly monitored by field assistants.
Corrective Actions:	Conducting socialization to all TUS employees to mix chemicals in the prepared mixing warehouse.
	Undertake strict supervision by field assistants.
	2. Refreshment of waste management SOPs for employees;
	Monitoring the implementation of waste management by field assistant.
	3. Refreshment of waste management SOPs for employees;
	Monitoring the implementation of waste management by field assistant.
	4. Monitoring the expiration date of all chemicals in the Agrochemical warehouse, and reporting it to KTU if any of them have expired for further handling.
	5. Completing the shortage of containers for palm oil droplets in the mill area and ensuring the availability of containers for collecting palm oil droplets.
	6. Monitoring and making checklists for inspection and maintenance of flow meter connector pipes.
Assessment Conclusion:	Corrective action plan has been made by company and accepted by audit team. The effectiveness of implementation will be verified in the next assessment.

Non-conformity			
NCR Ref #	2049985-202101-N2	Clause & Category (Critical (Major) / Minor)	RSPO INA-NI 2020 Indicator 6.2.7 Minor
Date Issued	27 February 2021	Due Date	Next Assessment
Closed (Yes / No)	No	Date of nonconformity Closure	-
Statement of Nonconformity:	PT RSK and PT ISJ still use temporary workers to performed core work (harvesting) and Mill processing at the Tanjung Selamat mill for more than one year, in addition there is no programme to promote the workers as permanent employee.		



Requirement Reference:	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
Objective Evidence:	Based on the employess master for the period December 2020, PT ISJ and PT RSK still have 70 temporary workers (Daily: PHL) who do the main work, namely:
	• There are 41 harvesters in the Pangkatan Estate with status casual workers (PHL), has work more than 1 year
	• Tanjung Selamat Estate has 24 harvesters with status casual workers (PHL), has work more than 1 year
	• Tanjung Selamat Mill has 2 processing workers, 2 Laboratory workers and 1 Biogas worker with status casual workers (PHL), has work more than 1 year.
Corrections:	Coordinate with the HR Department regarding the program for the appointment/promotion of temporary (PHL) employees to become SKUs/permanent employees. Consult with the Department of Manpower regarding the use of PHL workers and their appointment program.
Root Cause Analysis:	The Covid-19 Pandemic conditions that have caused constraints to the company's program for the appointment/promotion of temporary (PHL) employees to become SKUs/permanent employees.
Corrective Actions:	Make a timeline for the appointment/promotion of temporary (PHL) employees to become SKUs/permanent employees.
Assessment Conclusion:	Corrective action plan has been made by company and accepted by audit team. The effectiveness of implementation will be verified in the next assessment.

Non-conformity			
NCR Ref #	2049985-202101-N3	Clause & Category (Critical (Major) / Minor)	RSPO INA-NI 2020 Indicator 2.1.3 Minor
Date Issued	27 February 2021	Due Date	Next Assessment
Closed (Yes / No)	No	Date of nonconformity Closure	-
Statement of Nonconformity:	During field visit It was found the deviation of numbering between the sample of HGU Pole number with the HGU Maps. The number of HGU pole in the field was not accordance with HGU maps.		
Requirement Reference:	Legal or authorized boundaries are clearly demarcated and visibly maintained and there is no planting beyond these legal or authorized boundaries.		
Objective Evidence:	 no planting beyond these legal or authorized boundaries. During field visit to Pangkatan Estate, it was found: HGU Pole number LXV in the HGU Maps, however in the field HGU number was RSK 023 HGU Pole number LXVIII in block A18a in the HGU Maps, however in the field HGU number was RSK 015 HGU pole number LXI in the HGU maps, however in the field HGU number was RSK 014 		



Corrections:	Adjust the HGU pole number in the field with the new HGU marker map as a reference for numbering in the field, in accordance with the change in the HGU pole numbering.	
Root Cause Analysis:	The extension of the validity period of the HGU which is currently under process has caused a change in the numbering of the HGU pole according to "Risalah Panitia B" together with the National Land Agency (BPN), so that the number of existing poles in the field is different from the number of poles that have been updated on the map.	
Corrective Actions:	Changing the HGU pole number in the field gradually, and made a new timeline for the progress of the pole numbering. Monitoring and maintenance of HGU poles.	
Assessment Conclusion:	Corrective action plan has been made by company and accepted by audit team. The effectiveness of implementation will be verified in the next assessment.	

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	Non-conformity				
NCR Ref #	1756144-201903-M1	Clause & Category (Critical (Major) / Minor)	RSPO P&C INA NI 2016, Indicator 5.3.2 Major		
Closed (Yes / No)	Yes	Date of nonconformity Closure	18 th June 2019		
Statement of Nonconformity:	Fertilizer inner bag waste and Hazardous waste are not disposed of responsibly by Certificate Holder.				
Requirement Reference:	There shall be evidence that all chemicals and their empty containers are disposed of responsibly.				
Objective Evidence:	During field observation at fertilizer storage complex near worker housing complex Afdeling 1&2 Pangkatan Estate, auditor team found that fertilizer inner bag waste and hazardous waste are not placed and disposed responsibly. As follow: 1) Fertilizer inner bag stacked in open area.				
	2) Oil filter disposed scattered in front yard of storage.				
Corrections:	 Collect the fertilizer inner bag waste and place in central warehouse immedaiately. Collect the oil filter and placed in Hazardous Waste storage and recorded in the logbook immediately. 				



Root Cause Analysis:	Less monitoring and supervising on Hazardous waste handling		
Corrective Actions:	 Optimization on supervising of all fertilizer inner bag and hazardous waste management to the workers following the company procedure. PT Indo Sepadan Jaya has made the supervision to ensure that all fertilizer inner bag and hazardous waste management to the workers following the company procedure. Supervision was made by each Estate management and Mil management. During remote audit of recertification confirmed that the fertilizer inner bag and hazardous waste was managed as per procedure AA-KL-05-EFP. Hazardous and medical waste is disposed to the register collectors while domestic waste disposed to the landfill, organic and an organic waste is separate in line site, organic waste to the landfill and some of inorganic waste is collected for re-cycle. PT Indo Sepadan Jaya has a licence for hazardous waste storage based on "Keputusan Kepala Dinas Penanaman Modal dan Pelayanan Terpadu Satu Pintu Kabupaten labuhan Batu Nomor: 503.660.3/556/DPMPTSP-BP2MNP/2019 Tentang Pemberian Izin Pengelolaan Limbah B3 Untuk Kegiatan Penyimpanan Limbah B3 kepada PT ISJ". Monitoring and periodical inspection to all area relating hazardous waste management. Monitoring and inspection of hazardous waste management has been performed by Estate and mill management in coordination with sustainability department. 		
Assessment Conclusion:	 During field visit at used polybag and rags storage at central warehouse, all the fertilizer inner bag are placed at this area. Oil filter already placed in Hazardous Waste storage and recorded in Logbook. All hazardous waste already taken by permitted transporter (PT. Indo Star Cargo) and sent to collector (PT. Sumatera Deli Lestari Indah) on 24 May 2019, with Manifest Doc. No. 0027943. According to the evidence provided and field verification, the corrective action made is effectively implemented. Therefore, auditor concludes this Non-Conformity is Closed. During this audit, Auditor conclude that the Major NC regarding hazardous waste management are remain closed and effectively maintained. 		

NCR Ref #	1756144-201903-M2	Clause & Category (Major / Minor)	RSPO P&C INA NI 2016, Indicator 5.6.2 Major
Date Issued	29 th March 2019	Due Date	28 th June 2019
Closed (Yes / No)	Yes	Date of nonconformity Closure	18 th June 2019
Statement of Nonconformity:	Certificate Holder has not implementing action to minimize impact of significant pollutant from all activities.		
Requirement Reference:	Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plan to reduce or minimize them implemented.		
Objective Evidence:	During field observation at fertilizer storage complex near worker housing complex Afdeling 1&2 Pangkatan Estate, auditor team found that Diesel fuel was spillage and contaminate to soil by the replanting contractor.		
Corrections:	 Taking the contaminated soil and collected in Hazardous Waste Storage. Place the oil proof layer and pallet pad below the fuel (diesel) drum. 		



	3. Create the oil containment from iron/solid plate when taking a fuel to small container.		
	4. Place the fire extinguisher near the fuel collection area and the signboard.		
Root Cause Analysis:	No adequate pallet pad to place fuel (diesel) drum, then during taking of fuel there was spill and contaminating soil.		
Corrective Actions:	1. Briefing routinely to person or contractor related handling of fuel spillage. Company has consistently to brief the existing contractor and new contractor regarding the fuel handling and prevent the fuel spilage. During audit can be demonstrated that regular briefing and monitoring has been done to the contractor.		
	2. Put the company procedure relating fuel management by contractor.		
	PT Indo Sepadan Jaya has socialized regularly to contractors related fuel-handling procedures. During audit can be demonstrated the evidence of socialization of procedure to contractor.		
	3. Optimization on supervising to contractor.		
	Company Field assistant conducted the regular briefing and monitoring to contractor, to ensure the compliance of contractor against company procedure. During audit can be demonstrated that supervising from field assistant has been done accordingly.		
Assessment Conclusion:	During field visit at front yard of fertilizer storage in Afdeling 1&2 Pangkatan Estate, Diesel fuel are place appropriately.		
	According to the evidence provided and field verification, the corrective action made is effectively implemented. Therefore, auditor concludes this Non-Conformity is Closed.		
	During this audit, auditor conclude that the Major NC regarding fuel handling and fuel spillage prevention are remain closed and effectively maintained.		

Opportunity for Improvement			
OFI#	Description		
OFI 1			

3.4.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1128962M1	Major	3.1.1	08/12/2014	Closed on 23 March 2015
1128962M2	Major	4.7.2	08/12/2014	Closed on 23 March 2015
1128962M3	Major	6.3.1	08/12/2014	Closed on 23 March 2015
1307239N1	Minor	4.8.2	31/03/2016	Closed on 16 May 2017
1307239N2	Minor	4.7.6	31/03/2016	Closed on 16 May 2017
1307239N3	Minor	2.2.2	31/03/2016	Closed on 16 May 2017
1479188-201705-N1	Minor	6.1.4	18/05/2017	Escalated to Major NC
1600992-201802-M1	Major	1.1.2	28/02/2018	Closed on 6 April 2018
1600992-201802-M2	Major	4.6.11	28/02/2018	Closed on 6 April 2018



1600992-201802-M3	Major	4.7.2	28/02/2018	Closed on 6 April 2018
1600992-201802-M4	Major	4.7.4	28/02/2018	Closed on 6 April 2018
1600992-201802-M5	Major	4.7.5	28/02/2018	Closed on 6 April 2018
1600992-201802-M6	Major	6.1.4	28/02/2018	Closed on 6 April 2018
1600992-201802-M7	Major	SCC 5.7.2	28/02/2018	Closed on 6 April 2018
1600992-201802-N1	Minor	2.1.3	28/02/2018	Closed on 29 March 2019
1600992-201802-N2	Minor	4.7.7	28/02/2018	Closed on 29 March 2019
1600992-201802-N3	Minor	5.1.3	28/02/2018	Closed on 29 March 2019
1756144-201903-M1	Major	5.3.2	29/03/2019	Closed on 18 June 2019
1756144-201903-M2	Major	5.6.2	29/03/2019	Closed on 18 June 2019
1921605-202006-M1	Critical	2.3.1	11/06/ 2020	Closed on 6 August 2020
1921605-202006-M2	Critical	4.1.1	11/06/ 2020	Closed on 6 August 2020
1921605-202006-M3	Critical	6.6.2	11/06/ 2020	Closed on 6 August 2020
1921605-202006-N1	Minor	7.1.2	11/06/2020	Closed on 26 February 2021
2049985-202101-M1	Critical	3.6.2	27/02/2021	Closed on 5 May 2021
2049985-202101-N1	Minor	7.3.1	27/02/2021	OPEN
2049985-202101-N2	Minor	6.2.7	27/02/2021	OPEN
2049985-202101-N3	Minor	2.1.3	27/02/2021	OPEN

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 Indo Sepadan Jaya – Tanjung Selamat POM Certification Unit's environmental and social performance, legal and any known dispute issues. Stakeholder notification has been made on 20th January 2021 and published in the RSPO https://www.rspo.org/certification/public-announcement and BSI website.

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

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

List of Stakeholders contacted		
Internal Stakeholders	Union/Contractors	



Gender Committee:

Ibu Romasi banjarnahor (Chief of Gender Committee in PT ISJ)

Workers of PT Indo Sepadan Jaya — Tanjung Selamat POM and Supply Bases.

Koperasi Karyawan Bina Mandiri PT RSK & PR ISJ:

Bpk. Yulianus Waruwu

Government Departments

Environmental Office of Pelalawan Regency: Ibu Sortauli T. Manurung (Kepala Bidang Tata Lingkungan)

Department of Plantation in Labuhanbatu

Regency: Kabid: Aidil Mansyur

Department of Manpower of Labuhanbatu

Regency: Bpk. Tumpak Manik SH.

Consultation by telephone

Union Labor -PUK SPSI:

PT RSK: Sdr. Henri G. Sinaga

PT ISJ: Josmar Tamba

Head of Sennah Village: Bpk. Horas Lumban Gaol

(Kepala Desa Sennah)

Head of Tanjung Selamat Village: Ibu. Rieky Zeneia

S.E (Kepala Desa Tanjung Selamat)

NGO

Jurnalist from Metro News Labuhanbatu Regency:

Bpk. Pardosi

Consultation by telephone

Stakeholders comment

1. Feedbacks:

Dinas Pertanian dan Perkebunan Kabupaten Labuhanbatu:- Plantation Agency Labuhanbatu Regency

Bpk. Aidil Mansyur

- In general, communication between the company and the "Plantation Office of Labuhanbatu Regency" has been going well.
- PT. Indo Sepadan Jaya has obtained the "Plantation Business Permit (IUP)".
- PT. Indo Sepadan Jaya has sent "Laporan Perkembangan Usaha Perkebunan (LPUP) for the first, second and fourth quarters of 2017 to the relevant authorities:" Labuhanbatu Regent, "Labuhanbatu District Agriculture Office", "Dinas Pengendalian Lahan dan Tata Ruang (PLTR) District Labuhanbatu" and "Kantor Pertanahan Kabupaten Labuhanbatu" in accordance with "Proof of submission of LPUP documents".
- PT. Indo Sepadan Jaya has obtained the "Plantations Class III Rating" (Medium) Penilaian Kelas Kebun III" (Sedang). Meanwhile, PT Rantau Sinar Karsa received a "Class II" (Good) Plantations class rating.
- The company has reported monitoring of fire incidents on a three-month basis.
- The price of FFB is determined from the "North Sumatra Provincial Agriculture Office" every month.
- Companies (PT ISJ and PT RSK) already have community empowerment programs through the CSV (Create Share Value) program.
- No complaints were reported and/or recorded by the "Plantation Office of North Sumatra Province" related to mill and plantation operations.

Management Responses:

- Management acknowledges positive feedback/comments and is deemed compliant.
- PT Rantau Sinar Karsa: Based on the Decree of the Regent of Labuhanbatu No.520/123.1/DIPERTA/2017 dated July 21, 2017 regarding the Establishment of the Plantation



Business Class of PT Rantau Sinar Karsa located in Sennah Village, Bilah Hilir District as Class II (Good).

- PT Indo Sepadan Jaya received a plantation class assessment with a Class III (Medium) category based on the results of the 2018 Plantation Business Assessment Number 525/435/XI/2018 dated December 31, 2018.
- IUP PT Indo Sepadan Jaya (Plantation Business Permit from the Minister of Agriculture No. HK.350/E4.242/03.89, dated 28 March 1989, has been amended to IUP no. HK.350/M4.338/04.90, dated 10 April 1990 concerning: "Amendment and Extension of Plantation Business Principle Approval") has been issued since 2001 so that there is no obligation to develop community gardens.
- However, PT Indo Sepadan Jaya and PT Rantau Sinar Karsa have a CSV (Create Share Value) program which is an oil palm partnership with the surrounding community, CSV programs for the 2020-2021 period, including:
 - 1) Independent Smallholder Training in Preparation for Certification, will be held in April-May 2021.
 - 2) Independent Smallholder Coordination Meeting, will be held in June-September 2021
 - 3) Providing tools and materials for pottery crafts under the business name MN Trampil Pottery Industry in Pulau Intan A Hamlet, Tanjung Harapan Village, which was carried out on February 26, 2020.
 - 4) Making an Appeal Sign, carried out in May 2021
 - 5) Project to making owl cages assistance, implemented in May 2021
 - 6) Road Repair Assistance, will be implemented in April-May 2021.
 - 7) Rehab assistance and Cooperative Office Equipment, will be implemented in April-May 2021.
- The company has provided a FFB price formula and communicated it to FFB suppliers, so far there have been no complaints regarding FFB prices.
- "Outer FFB Pricing Strategy", the parameters for calculating the price are:
 - 1) CPO price
 - 2) Transportation costs
 - 3) OER CPO FFB outside
- The company cooperates with the local community in the purchase of FFB and is recorded in the "Statements and Guarantees". Statements and Guarantees as FFB suppliers, there are 10 FFB suppliers, namely: Roma, Wan juma Sari, UD. Ula Tersia, UD. Friends, Soo Boon Pin, Al-Muh TS, Tan Ing Sing, Mitra Langgeng, Gapoktan Sumber Rejeki and KOPKUN Anug Jaya Mandiri.

Audit Team Findings:

- The company's obligations related to reporting have been carried out properly, so that reporting is carried out per semester in accordance with the predetermined period.
- Determination of FFB prices that are transparent to farmers and information can be found easily every day. The implementation of the FFB assessment at Tanjung Selamat Mill so that it can be socialized and explained, especially to independent and plasma farmers with a fully managed system.
- Facing the dry season and the danger of land fires, the company has prepared through an emergency response organization.

2. Feedbacks:

Environmental Office of Pelalawan Regency - Dinas Lingkungan Hidup Kabupaten Labuhanbatu

Ibu Sortauli T. Manurung (Kepala Bidang Tata Lingkungan)



- In general, communication between the company and the "Labuhanbatu District Environmental Service" has been going well.
- PT. Indo Sepadan Jaya has obtained "Environmental Permits" for all areas of oil palm plantations and palm oil mills.
- PT. Indo Sepadan Jaya has a permit for the temporary storage of hazardous waste.
- PT. Indo Sepadan Jaya has not yet allowed applications for POME land, as the plantation is peat soil, so it does not qualify for POME applications.
- The company has prepared "RKL-RPL Implementation Report", "B3-hazardous waste report" and reported regularly (six months) to "Labuhanbatu Regency Environmental Service". PT Indo Sepadan Jaya (ISJ) and PT Rantau Sinar Karsa (RSK) have consistently submitted the RKL-RPL Implementation Report every 6 months (the last report from the Semester II 2020 period) was reported on February 15, 2021.
- There is a letter from the Ministry of Environment and Forestry, the Director General of Pollution and Environmental Damage Control no. S.94/PPKL/PKG/PKL.0/4/2019, dated April 1, 2019, regarding the order for the implementation of the restoration of the peat ecosystem and the submission of maps indicating damage to the peat ecosystem.
- There is news on internet social media related to pollution originating from the PT ISJ PKS, as follows:
 - On 15 November 2019, there are complaints from villagers of 3 Dusun (Dusun Aek Nauli, Kampung Selamat and Dusun Pardomuan Nauli) and the complaint: the existence of Tanjung Selamat Mill caused pollution and deems of disease carriers. This is due to the waste of Tanjung Selamat Mill channeled to the Tarihoran/Galundan River and the boiler smoke carrying black particles.
 - This complaint has been responded and verified by the Department of Environment of Labuhanbatu Regency on 28 November 2019. Verification result in the form of "Berita Acara Verifikasi Pengaduan Dugaan Pencemaran dan Kerusakan Lingkungan" was presented to villagers of Kampung Padang and Dusun Aek Nauli, Dusun Pardomuan Nauli and NGO PENJARA (Pemantau Kinerja Aparatur Negara).

Management Responses:

- AMDAL (SEIA) Environmental Evaluation Study (SEL), approved by the Central Commission for AMDAL, Ministry of Agriculture no. RC.220/385/B/II/94 dated 28 February 1994 for Tanjung Selamat Estate and no. RC.220/383/B/II/94, dated February 26, 1994 for Pangkatan Estate.
- The company also has licenses related to hazardous waste, namely: B3 waste storage allows PT. Indo Sepadan Jaya (Tanjung Estate and Mill) from the Regent of Labuhan Batu no. 503/660/324/BLH-LB/WAS/2014, dated December 30, 2014, valid until December 30, 2019.
- The application of liquid waste (Land Application / LA) is not good to be applied in peat areas located in PT Indo Sepadan Jaya, the plantation is peat soil, so it does not meet the requirements for POME applications.
- PT ISJ and PT RSK have followed up the letter from the Ministry of Environment and Forestry, the Director General of Pollution and Environmental Damage Control no. S.94/PPKL/PKG/PKL.0/4/2019, April 1, 2019. Developments up to January 2020 regarding the restoration of peat ecosystems:

PT Indo Sepadan Jaya and PT Rantau Sinar Karsa:

- 1) The Decree on Determination of Groundwater Level Monitoring Points has been issued, as many as 19 points and all loggers have been installed. Based on the Decree of the Director General of Pollution Control and Environmental Damage no. SK. 78/PPKL/PKG/PKL.0/7/2019 dated 26 July 2019.
- 2) Carry out monitoring every 2 weeks and every 3 months, Reports on the Peat Ecosystem Recovery Plan of PT ISJ and PT RSK, the latest is December 2020.
- Verification results in the form of facts that have been agreed by the all parties (attached), including:



- 1) The DLH (Dinas Lingkungan Hidup Labuhanbatu Regency) said that the Tanjung Selamat Mill (PT ISJ) is allowed to dispose of liquid waste to the river on the condition of accordance with the regulations contained in the license owned by PT ISJ.
- 2) That PT ISJ has provided assistance package Lebaran for the community around the plantation on 17 May 2019 and will give the Christmas Package/New Year in December 2019.
- 3) PT ISJ has been conducting free medical check-up for the people of the Dusun Aek Nauli on 17 May 2019 and medical check-up in Kampung Selamat and Dusun Pardomuan Nauli will be done next.
- 4) PT ISJ has been conducting the construction of meeting hall of Dusun Aek Nauli phase II and III on 17 May 2019
- 5) PT ISJ is not allowed to have Land Application license and the company has done the dismantling of pipes on 14 May 2018
- 6) Head of Dusun Pardomuan Nauli (Bpk. Martobet Manalu) states that the PT ISJ is less concerned about the environment, both in the handling of clean water and liquid waste streaming to the Kalundang River must comply with the standard quality in accordance with regulations and legislation
- 7) The meeting of this verification is witnessed by:
 - Section Head of Environmental Complaint and Dispute Resolution, Environment Office Labuhanbatu Regency.
 - Section Head of Environmental law Enforcement, Environment Office Labuhanbatu Regency.
 - NGO PENJARA (Pemantau Kinerja Aparatur Negara)
 - Head of Kampong Padang Village
 - Villagers of Dusun Aek Nauli and Dusun Pardomuan Nauli.

(evidence of the follow-up to the complaint regarding the alleged pollution has been verified by auditor)

Audit Team Findings:

Acknowledge by the auditor as a positive response, and will be monitored at each subsequent audit.

- Based on visits to riverbanks and forest tree nurseries for the purposes of planting the right and left sides of the riverbanks, it shows that the company has commitment and efforts to improve the riverbanks in their HGU.
- Implementation of peat ecosystem restoration program, will be verified every audit visit.
- During this audit, verification was carried out at the location where Tanjung Selamat POM was suspected of having polluted, the condition of the ditch was still well maintained. Verification was also carried out with the NGO, but the PIC in question could not be contacted by telephone. Related to this will be re-verified in future audits.

3. Feedbacks:

Department of Manpower of Labuhanbatu Regency:

Bpk. Tumpak Manik SH.

- PT. Indo Sepadan Jaya (PT ISJ) and PT Rantau Sinar Karsa (PT RSK) have established good communication with the "Office of Manpower and Transmigration of East Kutai Regency".
- PT. Indo Sepadan Jaya (PT ISJ) and PT Rantau Sinar Karsa (PT RSK) have prepared and reported on their industrial relations obligations such as the "Mandatory Labor Report" and "P2K3 Report" for health and safety performance.
- There is no indication/report on the use of underage workers in PT. Indo Sepadan Jaya and PT Rantau Sinar Karsa. PT. Indo Sepadan Jaya (PT ISJ) and PT Rantau Sinar Karsa (PT RSK) have applied minimum wages such as the "Labuhanbatu District Minimum Wage" to workers (above 18 years).



- Routine inspections on pressure vessels and steamers have been carried out, but the analysis of the results of the inspections is still in process by the "Labuhanbatu District Manpower and Transmigration Office".
- All steam engines, boiler engines and welding operators have been trained and granted an operator license from the "Ministry of Manpower".
- The company has provided training on the use of limited pesticides for sprayers.
- The company has reported overtime workers to the "Labuhanbatu District Manpower and Transmigration Office".
- The company has been equipped with clinics, with doctors and paramedics who have been trained with Hyperkes training.
- All employees have been registered with the social insurance "BPJS Manpower and Health Care".
- The company has a CLA for the period 2018-2020.
- The company has prepared personal protective equipment, based on risk assessment and accident records.
- Call for a meeting/agreement with worker representatives to discuss the wage setting for the 2021 period, (a wage increase of 8%-10% of wages for the 2020 period can be made).

Management Responses:

- PT. Indo Sepadan Jaya and PT Rantau Sinar Karsa acknowledge the positive feedback and consider the comments constructive.
- Collective Labor Agreement (PKB) between the Cooperation Agency of Sumatran Plantation Companies (BKS-PPS) and the Central Management of the Federation of Agricultural Workers Unions and Plantation Unions of All Indonesia (PP.FSP.PP-SPSI) which have been registered with the Ministry of Manpower in accordance with the Decree Director General of Industrial Relations and Labor Social Security No. KEEP. 88/PHIJSK-PKKAD/PKB/VI/2015, dated 4 July 2018, effective from 8 April 2018 to 20 April 2020, outlining the Rights and Obligations of Workers with SKU status (General Work Terms).
- The company has registered all employees with BPJS Employment and Health (Accident and health insurance).

Tanjung Selamat Estate:

The last BPJS tenagakerja (Jamsostek) contribution payment was for the period January 2021 on January 26, 2021 as many as 537 people, no. registration BB021715 (328 participants), No. BB020692 (69 Participants) and No. BB020245 (161 participants).

BPJS Kesehatan for the January 2021 period has paid dues on January 12, 2021, with 352 employees. The proposal for registration in January 2020 is 54 people. In addition, there are also 85 employees who are dependents of their husbands. So there are still 46 employees who have not been registered because they have problems with their ID cards and family cards.

PMKS Tanjung Selamat:

The last payment of BPJS Tenagakerja (Jamsostek) contributions was for the period January 2021 on January 26, 2021 as many as 88 people, no. registration BB020568000 (Tanjung Selamat Mill). BPJS Kesehatan has paid dues for the January 2021 period on January 12, 2021, with 88 employees.

Pangkatan Estate (PT RSK):

The last payment of BPJS tenagakaerja (Jamsostek) contributions was for the period January 2021 on January 26, 2021 as many as 446 people no. registration BB020242 (SKU employees) and BB 021630 (for PHL employees). BPJS kesehatan for the January 2021 period has paid dues on January 12, 2021, with 446 employees

- Operator Permit/licenses: Heavy equipment operators and welders PT Rantau Sinar Karsa and PT Indo Sepadan Jaya have K3 licenses (SIO Operator).



- For the 2020 period the determination of the minimum wage is based on the Governor's Decree no. 188.44//17/KPTS/2020, dated January 13, 2020; concerning: "Sectoral Minimum Wage for Labuhanbatu Regency in 2020 is IDR 3,284,500 per month. Meanwhile, for the 2021 period, a letter from the Head of the Manpower Office (Kadisnaker) of Labuhanbatu Regency has been issued with the number: 560/0190/DTK-4/2021, dated February 8, 2021 Regarding: Call for Discussion on 2021 Workers' Wages, which is addressed to a number of companies in Labuhanbatu Regency.
- The Governor of North Sumatra in Governor's Decree Number 188.44/528/KPTS/2020 stipulates the North Sumatra Provincial Minimum Wage (UMP) in 2021 at Rp 2,499,423. This figure is the same as the 2020 UMP. This decision was motivated by following the Ministerial Circular No. M/11/HK.04/X/2020 concerning Minimum Wage Determination in 2021 during the Corona Virus Disease 2019 (Covid-19) Pandemic. Likewise, the determination of the 2021 UMK has referred to Government Regulation (PP) No. 78/2015 concerning Wages. So that in the determination of the minimum wages in PT ISJ and PT RSK there is no change from the minimum wage for the 2020 period.

Audit Team Findings:

- Acknowledge by the auditor as a positive response, and will be monitored at each subsequent audit.
- Regarding wages, use of PPE and SIO, the company has implemented it in accordance with related regulations and legislation.

4. Feedbacks:

NGO/Jurnalist from Metro News Labuhanbatu Regency:

Bpk. Pardosi

There is news on internet social media related to pollution originating from the PT ISJ PKS, as follows:

On 15 November 2019, there are complaints from villagers of 3 Dusun (Dusun Aek Nauli, Kampung Selamat and Dusun Pardomuan Nauli) and the complaint: the existence of Tanjung Selamat Mill caused pollution and deems of disease carriers. This is due to the waste of Tanjung Selamat Mill channeled to the Tarihoran/Galundan River and the boiler smoke carrying black particles.

Management Responses:

- This complaint has been responded and verification by the Department of Environment of Labuhanbatu Regency on 28 November 2019. Verification result in the form of "Berita Acara Verifikasi Pengaduan Dugaan Pencemaran dan Kerusakan Lingkungan" was presented to villagers of Kampung Padang and Dusun Aek Nauli, Dusun Pardomuan Nauli and NGO PENJARA (Pemantau Kinerja Aparatur Negara).
- Verification results in the form of facts that have been agreed by the all parties (attached), including:
 - 1) The DLH (Dinas Lingkungan Hidup Labuhanbatu Regency) said that the Tanjung Selamat Mill (PT ISJ) is allowed to dispose of liquid waste to the river on the condition of accordance with the regulations contained in the license owned by PT ISJ.
 - 2) That PT ISJ has provided assistance package Lebaran for the community around the plantation on 17 May 2019 and will give the Christmas Package/New Year in December 2019.
 - 3) PT ISJ has been conducting free medical check-up for the people of the Dusun Aek Nauli on 17 May 2019 and than medical check-up in Kampung Selamat and Dusun Pardomuan Nauli will be done next.
 - 4) PT ISJ has been conducting the construction of meeting hall of Dusun Aek Nauli phase II and III on 17 May 2019
 - 5) PT ISJ is not allowed to have Land Apllication license and the company has done the dismantling of pipes on 14 May 2018
 - 6) Head of Dusun Pardomuan Nauli (Bpk. Martobet Manalu) states that the PT ISJ is less concerned about the environment, both in the handling of clean water and liquid waste streaming to the Kalundang River must comply with the standard quality in accordance with regulations and legislation



- 7) The meeting of this verification is witnessed by:
 - Section Head of Environmental Complaint and Dispute Resolution, Environment Office Labuhanbatu Regency.
 - Section Head of Environmental law Enforcement, Environment Office Labuhanbatu Regency.
 - NGO PENJARA (Pemantau Kinerja Aparatur Negara)
 - · Head of Kampong Padang Village
 - Villagers of Dusun Aek Nauli and Dusun Pardomuan Nauli.

(evidence of the follow-up to the complaint regarding the alleged pollution is attached)

Audit Team Findings:

When this audit was carried out, verification was carried out at the location where Tanjung Selamat POM was suspected of having polluted, the condition of the ditch was still well maintained. Verification was also carried out with the NGO PENJARA, but the PIC in question could not be contacted by telephone.

Complaint regarding the pollution has been responded and verification by the Department of Environment of Labuhanbatu Regency on 28 November 2019. Verification result in the form of "Berita Acara Verifikasi Pengaduan Dugaan Pencemaran dan Kerusakan Lingkungan" was presented to villagers of Kampung Padang and Dusun Aek Nauli, Dusun Pardomuan Nauli and NGO PENJARA (Pemantau Kinerja Aparatur Negara). Verification results in the form of facts that have been agreed by the all parties and witnessed by:

- Section Head of Environmental Complaint and Dispute Resolution, Environment Office Labuhanbatu Regency.
- Section Head of Environmental law Enforcement, Environment Office Labuhanbatu Regency.
- NGO PENJARA (Pemantau Kinerja Aparatur Negara)
- Head of Kampong Padang Village
- Villagers of Dusun Aek Nauli and Dusun Pardomuan Nauli.

Evidence of complaint resolution document were vierified during audit.

5. Feedbacks:

Head of Sennah Village and Tanjung Selamat Village:

Bpk. Horas Lumban Gaol (Kepala Desa Sennah)

Ibu. Rieky Zeneia S.E (Kepala Desa Tanjung Selamat)

- Good communication between village officials and the company.
- Every year the company always has a CSR program for the surrounding community.
- Absorption of local workers to work at PT Indo Sepadan Jaya and PT Rantau Sinar Karsa is minimal, including at the casual service level, although job vacancies are always announced at PT Indo Sepadan Jaya and PT Rantau Sinar Karsa which are handed over to village officials around Kampung Padang Village, Desa Senna, Tanjung Selamat Village, etc. However, the company should always provide information related to the opening of the workforce.
- Until now, communication between the village and the company has been running smoothly and stated that there has been a CSR program.
- During 2020-2021 there were no reports of land disputes between communities and companies at PT ISJ, except in PT RSK there were issues related to land conflicts, as follow.

There is a land conflict issue in Pangkatan Estate

Based on the results of the public consultation with the Land Office-BPN of Labuhan Batu Regency on 26 March 2019 stated that there is a community claim on the area of HGU PT RSK:

That HGU No. 3/Sennah whose rights will expire on December 31, 2020 based on the Decree of the Head of the National Land Agency No. 125 HGU/BPN/2004 dated October 28, 2004 regarding the



granting of an extension of the term and renewal of HGU on land located in Kab. Labuhanbatu and has been registered for the extension of the HGU period ending on December 31, 2045 on a land area of 4,336 Ha as described in the measuring letter dated January 5, 1993 No. 151/1993. From this, there is a problem with the demands of 4 (four) farmer groups: Farmers and Fishermen Group, KT Bomban Seberang Seberang, KT Makmur Parduaan, and KT Dusun V, VI, VII for the land with an area of approximately 2,062.16 Ha which is located on the river border. Merbau Afdeling II (map attached).

Management Responses:

- Communication is always well established with the surrounding community. There was no land conflict made know with surrounding community until this audit.
- Routinely companies provide assistance through CSR programs in the form of borrowing heavy equipment (excavators, graders and compactors), scholarships, assistance to the poor, religious facilities, etc.
- Improving future CSR programs based on the potential of the village concerned and empowering the community by conducting soft skills training. For example with agricultural and livestock farming programs with at the same time provide direct guidance and direction.
- Associated with the establishment of plantations through plasma scheme, which is completed 100% of the plan.

Related to the land conflict issue in Pangkatan Estate, can be described as follow:

The problem was handled by the Mediation team of the Land Regional Office North Sumatra Province on October 2, 2020 which was attended by all representatives of the parties including the Head of the North Sumatra Province Plantation Service, the Regent of Labuhanbantu, Representatives of PT Rantau Sinar Karsa and the head of Senaah Village as well as the 4 farmer groups concerned, with the following results:

- a. The community has conveyed that PT RSK can pay attention to the demands of farmer groups.
- b. PT RSK is willing to pay attention to the community in accordance with the legal corridor
- c. The farmer groups will submit the details of their wishes and completeness of the documents in writing to the Regional Office of the National Land Agency Prov. North Sumatra in the not too distant future
- d. Further discussions will be held after the Regional Office of the National Land Agency Prov. North Sumatra received details of the wishes and completeness of the documents in writing from each farmer group.

Furthermore, on December 10, 2020, a final degree meeting was held with recommendations/conclusions:

- a. In accordance with the conclusion of the mediation meeting on October 13, 2020, the farmer groups will submit details of their wishes in the near future, but until now (the meeting was held) there are no details desired by the farmer groups. However, on December 8, 2020, the Regional Office of BPN Prov. North Sumatra only received a letter from the Tani Makmur Perduaan group regarding a request for the return of 600 hectares of land.
- b. PT RSK has paid attention to the surrounding community by carrying out social responsibility tasks in accordance with applicable regulations.
- c. Related to the demands of the community represented by KT Makmur Perduaan, KT Fishermen, KT Tani Bomban Seberang Seberang and KT Dusun V, VI, VII Pangkatan Village and KT Teluk Lesung for HGU area no. 3/Sennah registered in the name of PT Rantau Sinar Karsa to take legal action because no agreement was reached through mediation.
- d. Furthermore, the Regional Office of the BPN, North Sumatra Province, stated that: the process of issuing HGU no. 3/Sennah on behalf of PT Rantau Sinar Karsa covering an area of 4,366 hectares located in Pangkatan and Sennah Villages, Bilah Hilir sub-district, Labuhanbatu Regency, Prov. North Sumatra has complied with the applicable laws and regulations and the land is used in accordance with the decree granting its rights, so that if there are parties who object to take legal action.



At this time the condition of the land is still cultivated by the community as community land.

Audit Team Findings:

- CSR programs to be developed in accordance with community empowerment programs and guidance and coaching.
- The use of labor to be prioritized to the surrounding community by referring to recruitment procedures.
- Based on document verification of land conflict issue and resolution in Pangkatan Estate, confirmed that company has follow the resolution for land conflict through mediation with relevant government and in accordance with regulation. The company has held a meeting which was attended by the Head of the Fisherman Farmers Group, Bomban Bidang Seberang Farmers Group, Dusun V, VI, VII Farmers Group, and Teluk Lesung Farmers' group with mediation by the BPN-National Land Agency Regional Office of the National Land Agency of North Sumatra Province on December 30, 2020 and the conclusion, that the process of issuing Hak Guna Usaha (HGU) no. 3/Sennah on behalf of PT RSK covering an area of 4,336 Ha located in Pangkatan and Sennah Villages, Kec. Bilah Hilir, Kab. Labuhanbatu Prov. North Sumatra has complied with the applicable laws and regulations so that if there are parties who support them, they should take legal action. Until this audit conducted there has been no follow up from community to take legal action, and the company has also not taken any action that are evictions or forced land cultivation. The area is not planting area.

This land conflict in Pangkatan Estate will always verify when conducting an audit, whether there are any adverse impacts on the company and the surrounding community.

6. Feedbacks:

Union Labor -PUK SPSI:

PT RSK: Sdr. Henri G. Sinaga PT ISJ: Josmar Tamba

There were 3 issues that were discussed by employees of PT Indo Sepadan Jaya and PT Rantau Sinar Karsa, including:

- Most of the employee housing at Tanjung Selamat Mill has damages, so it needs renovation and maintenance.
- There is a delay in the distribution / distribution of PPE to employees, this is due to the quality of the PPE provided which has been damaged before the next supply period.
- There is news on internet social media related to the union which is a worker loading FFB at PMKS Tanjung Selamat, as follows:

On 2 June 2020, there are several villagers of Dusun Aek Nauli on Pangkatan Village, visit the Tanjung Selamat Mill to To raise complaints. The complaint delivered is related to the disagreement between the 2 of labor union i.e PUK SP.PP-SPSI as labor union in PT ISJ and PUK F. SPTI as that works as the unloading FFB of the transportation in the Tanjung Selamat Mill.

Management Responses:

- PT RSK and PT ISJ, have made a budget for the maintenance of employee housing for the period 2020 and 2021. This maintenance of employee housing is carried out after going through a survey/assessment by the emplacement foreman to determine the type of damage and maintenance that will be carried out in accordance with the 2020-2021 Budget. In addition to the routine maintenance specified in the annual budget, maintenance/repairs are also carried out on the basis of direct reports from the employee housing users.
- Maintenance in the form of painting walls and roofs of employee housing was last carried out in November 2020 at Tanjung Selamat Mill employee housing and is still around 60% realized, while the remaining 40% will be continued after the required materials are available. PO for procurement of materials has been carried out in January 2021 and work can be carried out in March 2021 (after materials and materials are available in the warehouse).



- The last P2K3 meeting on January 30, 2021 discussed the use of PPE for Toyo shoes as a substitute for special safety shoes for swamp areas, review of risk analysis. The last distribution of PPE to workers was carried out in the second semester of 2020 in December 2020.
- The company has followed up the complaint by conducting consultation with the PUK. SPTI (Loading and unloading FFB at Tanjung Selamat Mill) on 5 June 2020 and several related parties, including: Kapolsek Bilah Hilir, Danramil Bilah Hilir, Camat Pangkatan, Village Head of Kampung Padang and Chairman of the PUK F. SPTI (Note Meeting attached). Conclusions of the consultations are as follows:
 - 1) At this time the unloading processing of outside FFB in PMKS Tanjung Selamat was continued by the management of SPTI led by Husor Silaban until the condition went conducive.
 - 2) If the condition is not conducive, then to process the work of unloading outside FFB submitted to the company to take the decision of the party who can do the work of unloading FFB at PMKS Tanjung Selamat.
 - 3) The disputes between the management of the PUK chairman F. SPTI (Bpk. Husor Silaban with Yusuf Gurning) were completed internally or through a legal process.

Audit Team Findings:

- Based on data verification and consultation with the management of PT Indo Sepadan Jaya, the delay in repairing employee housing was caused by delays in procuring the necessary materials, even though the company has made a budget for employee housing repairs for the 2020-2021 period. Due to the COVID-19 pandemic in the 2020 period (social restrictions), there was a delay in the delivery of materials to the estate location. There is still around 40% of work remaining for painting housing walls and the plan will be carried out in March 2021, this will be a future concern for verification related to the issue of damage to employee housing.
- Based on the P2K3 meeting on January 30, 2020 it was agreed and the distribution of safety shoes was carried out in December 2020. This will be very important so that the auditor team has given their consent and will re-verify the provision and use of PPE in the next audit.
- The company has followed up related to the problem of loading and unloading FFB at PMKS Tanjung Selamat by holding a meeting on June 5, 2020 with interested parties (Kapolsek Bilah Hilir, Danramil Bilah Hilir, Camat Pangkatan, Village Head of Kampung Padang and Chairman of PUK F. SPTI). Through the meeting, it was agreed by the relevant parties that the FFB loading and unloading process was still carried out by members of PUK F.SPTI and further disputes between the management of the chairman of PUK F. SPTI (Mr. Husor Silaban and Yusuf Gurning) were resolved internally or through legal proceedings.

Feedbacks:

7.

Gender Committee:

Ibu Romasi banjarnahor (Chief of Gender Committee in PT ISJ)

- Company has implemented the policy related to protection reproductive right; such as not hiring female for work activity with high risk; monthly pregnancy test for sprayer and fertilizer applicator; 6-monthly check up for sprayer and fertilizer applicator.
- All female worker in sprayer team and fertilizer team shall join pregnancy test in company clinic, once a month.
- There has been no report logged in to committee related to sexual harassment and/or violence.
- There is no indication that company practicing sexual harassment, no indication of gender discrimination, no indication of human right violation, and forced labour.
- The new gender committee chair was appointed in January 2021 and currently is still in the process of adjustment for the preparation of work programs; Understanding training related to the organization and sexual harassment procedures for the gender committee will continue to be carried out..



Management Responses

Management will strive to continue and improve the positive practices in implementing company commitment towards health and safety, and upholding the human rights.

The appointment of the head of the new gender committee was conducted in 31 January 2021 based on Memorandum regarding Appointment of the leader of the gender Committee from Manager of PT Indo Sepadan Jaya No. 021/ES-KTS/MEMO/01/2021 dated 31 January 2021, so it is necessary to undertake learning and training and briefing related to the knowledge of gender committees.

Audit Team Findings

Audit team will continue to monitor PT Indo Sepadan Jaya and PT Rantau Sinar Karsa related to Plantation management and monitoring performance.

8. Feedbacks:

Koperasi Karyawan Bina Mandiri PT RSK

Bpk. Yulianus Waruwu

- PT RSK and PT ISJ have policies regarding the formation of employee cooperatives. Facilities in the form of buildings/rooms have been prepared to be able to carry out cooperative activities in each work unit.
- To be assisted to facilitate a more representative place at Marbo Camp.
- Workers cooperative is establish to fullfill the basic needs for employees with affordable price, so the workers no need to find basic needs outside the estates.

Management Responses

- Employees of PT. RSK is based on the central cooperative "Employee Cooperative Bina Mandiri" based on the Deed of Establishment no. 15 dated March 4, 2016. Based on the 2019 Annual Membership Meeting (RAT:Rapat Anggota tahunan), up to February 2019 86 employees have been registered as members of the Cooperative.
- Cooperatives at PT Indo Sepadan Jaya Employees at Kebun and PKS Tanjung Selamat were established on September 11, 2014 based on the Indosawit Employees Cooperative Establishment Meeting in accordance with the Minutes of Ratification of the Indosawit Employee Cooperative Establishment Deed, no. 25 by the Land Deed Maker Officer Kab. Labuhanbatu. The employee cooperative consists of staff and employees of PT Indo Sepadan Jaya).
- Indosawit Employee Cooperative has been approved as a legal entity through the Decree of the State Minister for Cooperatives and Small and Medium Enterprises of the Republic of Indonesia, no. 359/BH/DAG.KOP/IV/2014, 19 September 2014.
- The company has provided cooperative building facilities in the form of 1 semi-permanent type D2 housing unit, this house is intended for employee housing, but can be temporarily occupied by Kopkar Bina Mandiri. The plan for the construction of a special building for cooperatives has been budgeted for in 2021. With the Covid-19 pandemic, the realization of its construction has been delayed until the following year.

Audit Team Findings

The company has facilitated the establishment of employee cooperatives at PT ISJ and PT RSK, including the cooperative premises/buildings where cooperative activities are located (buildings, chairs and office stationery).

This is a positive activity and and will always be verified on the activities of the employee cooperative, including the annual RAT.

List of land owner / user contacted



Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Compliance on the agreement terms and conditions
Nil				

PT Indo Sepadan Jaya, Tanjung Selamat POM, Tanjung Selamat Estate and PT Rantau Sinar karsa – Pangkatan Estate has established since 1985 and has planting palm oil since 1984. Currently the palm oil has been replanting since 2012 – 2020.

Previous land owner / user comment					
	Feedbacks: Nil				
	Management Responses: Nil				
	Audit Team Findings: Nil				

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

The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that PT Indo Sepadan Jaya – Tanjung Selamat Mill has complied with the RSPO Principles and Criteria 2018, Indonesia National Interpretation 2020 for Sustainable Palm Oil 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 Indo Sepadan Jaya – Tanjung Selamat Mill is continued.

recommended that the contineation of 1 1 may separate st	- Tanjang Colamac i iii ib continucai
Report prepared by	Acceptance of Assessment Conclusion
Name: Mujinius Jalaraya	Name: Putu Ghryate Yonata Aksa
Company Name: BSI Services Malaysia Sdn. Bhd	Company Name: PT Indo Sepadan Jaya
Title: Lead Auditor	Title: Sustainability Coordinator
Signature:	Signature:
How	They of the
	(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.)
Date: 05/07/2021	Date: 09/07/2021



Appendix A: Summary of Findings

Criterio	Criterion / Indicator Assessment Findings		Compliance				
_	Principle 1: Behave ethically and transparently Drive ethical business behaviour, build trust and transparency with stakeholders to ensure strong and healthy relationships.						
	1.1: The unit of certification provides adequate information to relevant standard forms to allow for effective participation in decision making.	akeholders on environmental, social and legal issues relevant to RSPO Criter	ria, in appropriate				
1.1.1	(C) Management documents that are specified in the RSPO P&C are made publicly available.	PT Indo Sepadan Jaya and PT Rantau Sinar Karsa has list of information and listed in "Daftar Dokumen dan Informasi untuk Diakses Publik PT Ind Sepadan Jaya dan PT Rantau Sinar Karsa" has established on January 2020 there are 32 type of document of information, including: - Land titles/user rights (Izin Lokasi, Izin Prinsip, IPKH, Sertifikat HGU HGB and IMB) - Occupational health and safety plans (Laporan Pelaksanaan P2K3) - Plans and impact assessments relating to environmental and social impacts (AMDAL, Environmental licensing and Environmental Management Program) - HCV & HCS documentation (Conservation Management Plan, HCV Report, Social Impact Assessment and HCV Identification Report) - Pollution prevention and reduction plans (Environmental Management Program, Hazardous waste Report, Land Application Report and also Report of physical and chemical analysis of river water) - Details of complaints and grievances (Procedure of Information handling, Procedure of "keluhan konflik lahan" and records of anarecording of deliberation process and compensation). - Negotiation procedures (Recording of deliberation process and compensation)	do do, d, dit d				

		 Continuous improvement plans (Continuous Improvement Program) Human Rights Policy (including in the Company Policy update on 1 December 2019 and has been dissemination to all operation at workplace on 17 January 2021) Its list provides in Bahasa Indonesia and the form can be understand with all stakeholders. The list of information has been dissemination at the time of with the company Policy on 21 January 2020 to all operation at workplace. 	
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders.	Based on public consultation with government agency in Labuhan Batu and village representative from Kampung Padang and Sennah Village obtained information that the company shared the information to the relevant stakeholder in Bahasa. For example, regular report to the government agencies, FPIC procedure, complain and grievance mechanism, socialization of HCV area to the respective villagers and so on. During the onsite audit sighted the sign board of company's information (name and location, land title information and validity), boundary poles and HCV that written in Bahasa.	Complied
1.1.3	(C) Records of requests for information and responses are maintained.	Requests for information are responded by the department concerned in accordance with their authority. The company has developed a matrix describing the status of each information request and responsible to respond into. The company has appointed personal responsibility in accepting and responding to the request for information from the stakeholders, the personal responsible is the HUMAS (Public Relations). Appointment based on Internal Memorandum No. 070/HR-RO1/MEMO/03/18 dated March 7, 2018 to Mr. Hariadi as a Public Relation on PT Indo Sepadan Jaya and PT Rantau Sinar Karsa. Records of response of request information documented in the same book, consist of person handle the request, information given and acknowledgement from the person in-charge and signature. Record of incoming communication available in each estate and mill unit.	Complied

		The request for information was recorded on Logbook "Surat Masuk dan Keluar", taken example:	
		Tanjung Selamat Estate:	
		- Dated 26 January 2020, request information from stakeholder, related to penjelasan tentang penerapan prinsip ISPO has been responded on 6 January 2020.	
		- Dated 1/4/2020, Request for information from the Commission B of South Labuhan Batu, about the work visit of the District DPRD Committee. South Labuhan Batu, accepted by Angga Diotama. and was responded to 1/4/2020 by provide an accommodation fee.	
		Pangkatan Estate/PT RSK:	
		Sighted the record of incoming letter from vocational high school of Pangkatan on 28 January 2021 related to internship program in estate. Those proposal has been accepted and replied by estate manager on 1 February 2021.	
1.1.4	(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official.	Procedure of consultation and communication is records on SOP No. AA-GL-5008.1-R1: <i>Penanganan Permintaan Informasi Stakeholder</i> . The consultation and communication procedure were socialized to stakeholder on January 17, 2020 and participated by 9 stakeholders.	Complied
		The company has nominated person to responsible in consultation and communication with local communities and other stakeholders, the person who's responsible for consultation and communications is by Public Relations (PR). Designation of duty based on Memorandum from Regional Head P-1 No. 070/HR-ROI/MEMO/03/18 dated March 7, 2018 which assigned to Mr. Hariadi Public Relation for PT ISJ and RSK.	
		On Memorandum Chapter 1.4.5 state that: "There are also departments that support operational activities, including: D&L Department and Humas-PR namely: Mr. Hariadi for land acquisition and licensing issues, Department of HR Ops. Namely Mr. Ricki related to labor issues and EHS Department	



		Mr. Moh Sahrial on environmental issues as well as on health and safety of the work and the CSR Department (PIC Social: ie Mr. Aris Muharahman and manager unit for social and civic responsibilities) SPO Officer is responsible for the implementation and planning of information necessary and should be communicated (TSE, Mill and PKTE: namly Mr. Oskar Pardosi) to related parties as well as carrying out related documents.	
1.1.5	An up-to-date list of contacts and detailed stakeholder information is available along with designated representatives.	Stakeholder Tanjung Selamat (PT Indo Sepadan Jaya, including Estate and Mill) and Pangkatan Estate Update on 11 January 2021. The List of stakeholders consists of several types of stakeholders based on regional levels: village, provincial and national districts, including NGO, for example: Sawit Watch and Greenpeace Southeast Asia.	Complied
		The list of stakeholders presented in detail about the address, name of person and phone number and also position and title, the list is including of Environment Agency, Labour Agency, Plantation Agency and national land agency of Labuhan Batu Regency, police institution, local and national nongovernment agency, Subdistrict head of Pangkatan and Kampung Rakyat, Village Head of Kampung Padang, Tanjung Selamat and Sennah.	
Criteria	1.2: The unit of certification commits to ethical conduct in all business of	perations and transactions.	
1.2.1	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.	The company has corporate policy set on 1 December 2019 in Medan which has been ratified by the Managing Director (Kevin Tio). The company's policy confirms the code of Conduct behavior in business at point 2); Policy on the conduct of fair and ethical business on all transactions and business operating, including the prohibition of all forms of corruption, bribery and fraud in the use of funds and resources.	Complied
		In the employee selection process, the company has sets policies related the conduct of business ethics in the daily worker agreement (<i>Perjanjian Kerja Harian Lepas</i>), which is stated in the appendix to corporate policies and behaviors that must be complied with. PKB is a joint working agreement for permanent workers, also confirmed about the conduct of business ethics	

		in article 16 related of the behaviour of the business ethics in the company. A Policy for human rights, ethical conduct, high conservation value and any other social policy (company policy) has been socialized/delivered to all levels of PT ISJ and PT RSK employees on $16-17$ January 2021 (list of participants can be shown) and on stakeholders (including local contractors) on 1 February 2021 which was attended by 29 stakeholders.	
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.	Mechanism used to monitor the implementation of the company's policy, carried out by several methods, including: On workers conducted every morning before doing the work at 06.00 delivered by the field supervisor (Mandor) concerned, this activity is referred to as "morning circle or Muster morning". At the time of revision of the contract with the contractor (because the validity period has expired), the company always resubmit to all contractors about the conduct of business ethics which is subsequently carried out contracts by the contractor.	Complied
		In the event of changes or additions to the company's policy, the company will promptly deliver it, including updates to employment contracts and PKB and local employment contract documents.	
		This remote audit only verifies data/documents (offsite), so the implementation of this policy will be verified when an onsite audit is performed.	
		A Policy for human rights, ethical conduct, high conservation value and any other social policy (company policy) has been socialized/delivered to all levels of PT ISJ and PT RSK employees on 16 – 17 January 2021 (list of participants can be shown) and on stakeholders (including local contractors) on 1 February 2021 which was attended by 29 stakeholders.	
		Based on field visit and interview with representative's worker during the onsite audit obtained information that all worker shall committed and comply with the company's social policy. Violation of these social policies can result in soft sanction (warning letter) to severe sanctions (termination of employment).	

Complied



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Principle 2: Operate legally and respect rights

Implement legal requirements as the basic principles of operation in any jurisdiction.

Criteria 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.

2.1.1 **(C)** The unit of certification complies to relevant regulations.

The Company has implemented mechanism for ensuring compliance with applicable legal requirement. It was stated on "*Prosedur Pemenuhan Peraturan Perundang - undangan dan Perubahannya*" (SOP AA-GL-5001.1-R0), dated 5 December 2009. Evidence of implementation of legal requirements compliance evaluation is documented in "Status Evaluasi Per January 2020". The evaluation was performed on annual basis conducted by public relation officer. Latest evaluation was conducted on January 2020. Document of "Evaluasi Kepatuhan Hukum" is the system used for tracking any changes in laws and regulations. Evaluation of compliance with the regulation has updated on January 2021. Updating, for example:

Environment regulation:

- 1. PerMenLh no. 5 Tahun 2018, related Standard "sertifikasi kompetensi penangungjawab operasional pengolahan air limbah dan penanggungjawab pengendalian pencemaran air".
- 2. PerMenLh no. 6 Tahun 2018, related Standard "sertifikasi kompetensi penangungjawab operasional pencemaran udara dan penanggungjawab pengendalian pencemaran udara".
- 3. PerMenLh No. 8 Tahun 2018, related "prosedur tetap pengecekan lapangan informasi titik panas/atau informasi kebakaran hutan dan lahan".

Manpower regulation:

- 1. Ministry of Labor Decree No. 15 year 2018 related to minimum wage.
- 2. Governor of Sumatra Utara Decree No. 188.44/528/KPTS /2020 related to minimum wage of 2021.

Health and safety Regulation:

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		 Permenaker No. 5 Tahun 2018, related Kesehatan & Keselamatan Kerja Lingkungan Kerja. Agricultural regulation: Permentan No. 1 Tahun 2018, related Pedoman pentapan harga pembelian Tandan Buah Segar (TBS) kelap sawit produksi kebun. Peraturan Menteri Pertanian No 05 Tahun 2018, related Pembukuan dan/atau pengolahan lahan perkebunan tanpa membakar. KepMenATR No. 14 Tahun 2018, related to Izin Lokasi. 	
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.	Public affair department has conducted annual evaluation of legal compliance. The last evaluation is on February 2021. Based on the evaluation document obtained information that there are 7 (seven) new regulation related to plantation business. For example, Government Act No. 36 year 2021 related to payments. According to the evaluation, the company has complied with the regulation. Another regulation that has been evaluated was Presidential Regulation No. 44/2020 and Agricultural Minister Decree No. 38/2020 related to Indonesian Sustainable Palm Oil (ISPO).	Complied
2.1.3	Legal or authorized boundaries are clearly demarcated and visibly maintained and there is no planting beyond these legal or authorized boundaries.	According to the national regulation, each land title holder shall maintain his legal or authorized boundaries clearly demarcated and visible. Based on field observation in each estate concluded that boundary poles are in good condition as follows: • Tanjung Selamat Estate: boundary poles BPN ISJ 13 (block B16c), BPN PT ISJ No. 14 (block B16j) and BPN PT ISJ 15 (block B16i). • Pangkatan Estate: During field visit to Pangkatan Estate, it was found: • HGU Pole number LXV in the HGU Maps, however in the field HGU number was RSK 023	Non Compliance



		 HGU Pole number LXVIII in block A18a in the HGU Maps, however in the field HGU number was RSK 015 HGU pole number LXI in the HGU maps, however in the field HGU number was RSK 014 During field visit it was found the deviation of numbering between the sample of HGU Pole number with the HGU Maps. The number of HGU pole in the field was not accordance with HGU maps. This is raised as Noncompliance. 	
Criteria	2.2: All contractors providing operational services and su	upplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.	
2.2.1	A list of contracted parties is available.	PT Indo Sepadan Jaya and PT Rantau Sinar Karsa has a list of contracts and is well maintained in the format of "Monitoring of SPK Manufacturing and BAP payment in November 2019 up to February 2020, there are 9 contractors of FFB transporter, 4 contractors EFB transporter and also contractors for others jobs. Monitoring is monitored for job type, job period, job progress as well as BAP status/payment of contract. There are contracts for purchase of buying and selling FFB between Bumdes Tebing Tinggi Pangkatan Sejahtera with PT Indo Sepadan Jaya, contract No.: 01/CSV-KTS/X/2019 dated October 24, 2019 and this agreement is released until one of the parties terminates the agreement. Cooperation between PMKS Tanjung Selamat with PT Ayamas Putra Pratama for renovations of Loading Ramp with SPK No. 083/P1PTS/01/20 dated 30 January 2020 and Work Order Letter to PT Ayamas Putra Pratama was available as well. CPO and Kernel transportation SPK No. 02/X/SKJ-ISJ/2019 with PT Pengakutan Sekawan Jaya on 1 October 2019. During this audit, management units has several contracts related to third party. For example, there was a existing contractor that linked with Tanjung Selamat Estate and Pangkatan Estate:	Complied



		Contractors Names	Job Types	Contract Number	Period	Remarks	
		Nawi Kora Nginda	Boundary trenches cleaning	039/EIKTS/02/21	Jan – May 2021	Completed	
		Nurkanim Saragi	Road maintenance (mechanic)	037/EIKTS/02/21	Jan – Jun 21	Completed	
		Eliston Sibarani	School bus rent	201/EIKTS/10/21	Oct 20 – Mar 21	Completed	
		Dameri Sitepu	School bus rent	062/EIKTS/03/20	Mar 20 – Feb 21	Completed	
		Iwan Haryono	FFB Transporter	003/EIKTS/02/21	Jan – Feb 21	Completed	
		have been ve employment obligations to	rified above, the (including wage	ment (Contract co ere are explanations) and complianations rights and businessess ethics.	ons on legal r	requirements, gislation and	
2.2.2	All contract, including those for FFB supply, contain specific clause on meeting relevant legal requirements and this can be demonstrated by the third party.	and is well ma and BAP payr contractors of contractors for	aintained in the ment in Novemb FFFB transporter Tothers jobs. Mo	F Rantau Sinar Ka format of "Monito er 2019 up to Fe er, 4 contractors nitoring is monitor ayment Minutes) s	ring of SPK Nebruary 2020, EFB transpored for job type	Manufacturing, there are 9 rter and also be, job period,	
		Tebing Tinggi No.: 01/CSV-k released until between PMK renovations of	Pangkatan Seja (TS/X/2019 date one of the parti (S Tanjung Sela f Loading Ramp	se of buying and se htera with PT Ind ed October 24, 20 ses terminates the amat with PT Ay with SPK No. 00 er Letter to PT Ay	do Sepadan J 019 and this e agreement. vamas Putra 83/P1PTS/01/	laya, contract agreement is Cooperation Pratama for /20 dated 30	

		available as well. CPO and Kernel transportation SPK No. 02/X/SKJ-ISJ/2019 with PT Pengangkutan Sekawan Jaya on 1 October 2019. Based on the agreement document (Contract cooperation agreement) that have been verified above, there are explanations on legal requirements, employment (including wages) and compliance with legislation and obligations to respect human rights and business ethics in article 1 No. 6-9; and No. 13 related to business ethics.	
2.2.3	All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour.	 Third party contract with some FFB has completed with some important clause such as: The company policy related to children/underage worker, anti-drugs etc. Workers payment referred to local minimum payment's regulation. All worker will be register in health insurance and workers insurance according to national regulation. The same regulation also implemented in smallholder scheme. All of contract data kept by Head Clerk in estate and mill. 	Complied
Criteria 2	2.3: All FFB supplies from outside the unit of certification are from legal	sources.	
2.3.1	 (C) For all directly sourced FFB, Palm Oil Mill (POM) requires: Information regarding the geolocation of FFB origins; Proof of ownership status, right/claim of the land by grower/smallholder; If relevant, valid planting/operational/trading license, or is part of a cooperative which allows the buying and selling of FFB. 	The unit of certification has registered all third party FFB supplier, which are: 1. Roma 2. UD Ula Tersia 3. UD Sahabat 4. William Tanizar 5. CV Hasil Karya Sejati 6. CV Palta Jaya 7. Wan Juma Sari Dewi 8. Kopkun Anug Jaya Mandiri	Non Compliance



- 9. Koperasi Mandiri Tani Sejahtera
- 10. Bumdes Tebing Tinggi Pangkatan Sejahtera

Information of Geolocation of each FFB supplier can be demonstrated by the unit of certification.

Major Non-Conformity:

PT Indo Sepadan Jaya are received FFB from another source/grower & smallholder such as UD Sahabat (FFB Collector) and Bumdes Tebing Tinggi Pangkatan Sejahtera (CSV). However, company cannot be demonstrated the evidence of:

- Ownership status, right/claim of the land by grower/smallholder;
- If relevant, valid planting/operational/trading license, or is part of a cooperative which allows the buying and selling of FFB.

PT Indo Sepadan Jaya has made correction and corrective action to address the issue. Detail of correction and corrective action available at section 3.1 Details of Nonconformities. The NC has been Closed on 6 August 2020.

Sighted FFB purchase contract No. 003/TBS/ISJ/2020 dated 1 May 2020 between PT ISJ and UD Sahabat and contract No. 008/TBS/ISJ/2020 dated 1 May 2020 between PT ISJ and Bumdes Tebing Tinggi Pangkatan Sejahtera. That contract has covered the land status, legal requirement and other policy related to RSPO requirements. In addition, mill also validated the geo location of each smallholder (FFB sources). Record of geolocation are in places.

Based on document verification, unit management has implemented the corrective action until this audit.

Based on the agreement document (Cooperation Agreement contract), that in Article 7. About responsibilities and obligations, described in relation to legal requirements and documentation, employees (including not to employ minors or child labor), human rights and business-ethics.

Based on the agreement (Contract cooperation agreement) that have been



verified as above, there are explanations on legal requirements, employment (including wage) and compliance with legislation and the obligation to respect human rights, disallowing child, force labor and business ethics in article 1 No. 6-9; and no. 13 related to business ethics.

During this onsite, there are two additional supplier which is Koperasi Mandiri Tani Sejahtera (long term agreement) and Kopkun Anug Jaya Mandiri. Based on document verification and interview with Create Share Value (CSV) staff obtained information that both suppliers have been verified and visited by FFB purchasing staff. By visit to the suppliers land and tagged the coordinate, mill expected the FFB source comes from traceable and responsible area. The list of legal documents verified as follows:

- List of supplier member
- Coordinate and its overlay RTRW map.
- Personal tax identification of Koperasi Mandiri Tani Sejahtera.
- Business permit ID.
- Trading permit ID.
- Environmental permit.
- Location permit
- Registration of health insurance (BPJS Kesehatan)
- Copy of bank account

Based on document verification report above, the CSV staff submitted the report of verification to FFB Purchase Department to issue the Agreement Letter (Surat Perjanjian Kerjasama). Sighted the agreement Letter on FFB Supply dated 10 February 2020.

By signed this agreement letter, Koperasi Mandiri Tani Sejahtera has officially record as FFB Supplier of Tanjung Selamat POM.



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.	There are 5 indirectly sourced FFB supply to Tanjung Selamat palm Oil Mill. Company has agreement document (Cooperation Agreement contract), that in Article 7. About responsibilities and obligations, described in relation to legal requirements and documentation, employees (including not to employ minors or child labor), human rights and business-ethics.	Complied
		Based on the agreement (Contract cooperation agreement) that have been verified as above, there are explanations on legal requirements, employment (including wage) and compliance with legislation and the obligation to respect human rights, disallowing child, force labor and business ethics in article 1 No. 6-9; and no. 13 related to business ethics.	
		Based on document verification and interview with Create Share Value (CSV) staff obtained information that both suppliers have been verified and visited by FFB purchasing staff. By visit to the suppliers land and tagged the coordinate, mill expected the FFB source comes from traceable and responsible area. The list of legal documents verified as follows:	
		List of supplier member	
		Coordinate and its overlay RTRW map.	
		Land title for each supplier member.	
		Personal tax identification	
		Business permit ID.	
		Trading permit ID.	
		Copy of bank account	
		Below are the sample information collected for UD Sahabat (FFB Collector/Agent):	
		- Trading licence "Tanda Daftar Perusahaan No. 02292055101645 date 2 February 2017, valid until 2 February 2022.	
		- Sampled of land ownership status as a supply base of UD Sahabat:	



- 4. Land ownership Certificate (SHM) no. 288 dated 27 November 1996 on behalf Ali Akbar, issued by BPN Labuhan Batu Regency, land size 17,117 m².
- 5. Land ownership Certificate (SHM) no. 3239 dated 15 October 2018 on behalf Bainah Siregar, issued by BPN Labuhan Batu Regency, land size 19,940 m².
- 6. Land ownership Certificate (SHM) no. 3310 dated 17 October 2018 on behalf Mahmud Dasopang, issued by BPN Labuhan Batu Regency, land size 19,990 m².

PT Indo Sepadan Jaya has made the timeline to collected all the legality of the land ownership from each FFB suppliers (smallholder or agent or trader). The target was determine as November 2021 to collect all the information and data related to land legality and business entity of FFB supplier form Agent/Trader (indirect sources). This commitment has been signed by management of PT Indo Sepadan Jaya – Tanjung Selamat POM.

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

Implement plans, procedures and systems for continuous improvement.

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



3.1.1 **(C)** A business or management plan (minimum of three years) is documented and where applicable, includes a jointly developed business case for Scheme Smallholders. 7. Net Profit/Loss

A business management plan for long term economic feasibility has been documented by the Unit of Certification. The business management plan has included projection of production, quality planting material, mill extraction rates (OER and KER), upkeep cost, harvesting cost, transport cost, forecast price and capital expenditure.

Management plan was set up including independent FFB suppliers. Its management plan includes:

- 1. FFB Production projection 2020 2025
- 2. CPO, PK, production projection 2020 2025
- 3. OER, KER projection 2020 2025
- 4. Estate Cost Estimation: Upkeep cost, manuring cost, pest and disease management cost, pruning cost, census cost, terrace maintenance cost, road and bridge maintenance cost, harvesting cost.
- 5. Mill Cost, KCP Cost, Selling cost, Bulking cost and Tax portion actual 2019 and projection 2020 – 2025.
- 6. Replanting Program

Projection of Production:

Description	Projection							
	2020	2021	2022	2023	2024	2025		
FFB:								
Tanjung Selamat	102,292	115,584	121,789	123,407	122,053	121,732		
Pangkatan	36,332	53,016	76,255	95,117	105,370	111,319		
Total Own	138,624	168,600	198,044	218,524	227,423	233,051		
3 rd Party	134,000	135,000	135,000	135,000	135,000	135,000		
Grand Total	272,624	303,600	333,044	353,524	362,423	368,051		

Complied

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		СРО:							
		Own	27,518	35,736	43,113	48,902	52,291	54,675	
		3 rd Party	23,718	23,895	23,895	23,895	23,895	23,895	
		Grand Total	51,236	59,631	67,008	72,797	76,186	78,570	
		PK:							
		Own	6,862	8,346	9,803	10,817	11,257	11,536	
		3 rd Party	6,633	6,683	6,683	6,683	6,683	6,683	
		Grand Total	13,495	15,028	16,486	17,499	17,940	18,219	
3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available.		y has set a repetstate and for Y						Complied
	with yearly review, is available.		ument " <i>Peta F</i>						
		PT Rantau	Sinar Karsa	– Kebun	Pangkat	an, Peta	Rencana	Tumbang	
		Chipping OP 2020 and Time Schedule dan Kebutuhan Alat Berat Replanting 2020".							
			alization of repuntil 2021 pre				replantir	ng plan for	
		Year	Tanjung Sela	amat Esta	te (Ha)	Pangka	itan Esta	te (Ha)	
			Plan		ctual	Plan		Actual	
		2012	464		464	-		-	
						-		-	
		2013	886		886	-		-	

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_	-						
		2014	826	826	-	-	
		2015	475	475	293	293	
		2016	595	595	659	659	
		2017	612	612	710	710	
		2018	-	-	717	717	
		2019	-	-	713	769	
		2020	-	-	454	-	
			1	I	I	1	
3.1.3	The unit of certification holds management review at planned term according to the scale and nature of the activities undertaken.	2020, atten Assistant, managemer a. Result of For som on the fi been ca visit. b. Custom Feedbac stakehol logbook c. Process Tanjung for regul visit, it i	nt review for Tanjided by Technical KTU, Biogas As nt review has discust internal audit the discrepancies, efficield visit by Internal riced out and the rest feedback; as from customers of the monitor the resperformance; a Selamat palm oil all ar mill performance in the form of quid back in the form	Manager Laborsistant and Sussed: at conducted or vidence of important Auditor, the results obtained as can be convey the company also sponse when the mill has schedice (once a year lick input, whice	uhan Batu, Mill Sustainability n 28-29 Januar rovement has be boiler cycle rood I are better that wed through the so provides a fe here is input frouled VE visits, a c). If there is input h is immediately	I Manager, Mill Assistant. The ry 2020; een met. Based om cleaning has n before the VE e mechanism of eedback receipt om consumers. The result of the second of the secon	Complied

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next visit. Tanjung Selamat POM has support from several departments related to product conformity. RND will periodically monitor products from Tanjung Selamat POM and provide input or recommendations. The Tanjung Selamat POM also routinely conducts sample tests to ensure the quality of its products before delivery to buyers.

d. Preventive Action;

For the non-conformity of the unit regarding the RSPO SCCS, Clean the boiler cycle room routinely every 1 month including rotation in running the boiler between number 1 and number 2.

e. Follow Up Action;

For the non-conformity of the unit regarding the RSPO SCCS, Clean the boiler cycle room routinely every 1 month including rotation in running the boiler between number 1 and number 2.

- f. Change that effect the Management System;
 - Revising some procedures and mechanism related RSPO SCCS.
- g. Point Recommendation (a-f)
 - Increased Effectiveness:

Evaluations will be conducted periodically along with subsequent management reviews. Develop Table of Achievements - Minimizing nonconformities in RSPO SCCS.

Resources needed:

Appoint the PIC who is responsible for the scope relating to the RSPO SCCS process.

Management review for Pangkatan Estate conducted on 3 February 2020, attended by Estate Manager, Field Assistant, KTU and Sustainability Assistant. The management review has discussed:

a. Result of internal audit that conducted on 1-2 February 2020; e.g.



		An evaluation of legal compliance is available in the 2019 update, but there are regulations in the list of regulations in the RSPO P&C 2018 that are not evaluated.	
		Order and Realization of overtime in Pangkatan Estate were available, contains Date, Name of employee who works overtime, Employee register number, Locations, Planned overtime hours, Actual overtime hours, Conversions. Work orders are made by an assistant, examined by KTU, approved by Head Assistant. Evidence that employees who work overtime approve the overtime order is not available (according to article 6 of the Minister of Manpower and Transmigration No. 102-MEN-VI-2004).	
ı		New maternal valuation documents for female employees at the Pangkatan Estate are not available;	
		There is air emission analysis report for 2 generators and 2 water pumps conducted by Sucofindo in the 1st Semester on 26 May 2019. Based on the analysis results, noise parameters exceeding the quality standards and no corrective action plan are available.	
	3.2: The unit of certification regularly monitors and reviews their economonstrable continuous improvement in key operations.	omic, social and environmental performance and develops and implements ac	tion plans that
3.2.1	(C) The action plan for continuous improvement is implemented,	Action Plan Tanjung Selamat Estate:	Complied
	based on consideration of the main social and environmental impact	1. Problem:	
	and opportunities of the unit of certification.	Domestic waste.	
		Reduced Resources due to electricity usage.	
		Air pollution.	
		Decrease the use of pesticides.	
		2. Objective:	
		Reducing paper usage from 2 reams to 1.5 reams per month.	
1			
		Equalize electricity usage in all employee houses.	

3.2.2	As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat by Certification Body	RSPO Annual Communication of Progress 2019 of PT Inti Indosawit Subur has been available in RSPO website under membership number 1-0022-06-
		Continuous improvement in mill to reduce losses kernel form 0.11% to 0.08%. The improvement starts with recovering CBC blade in kernel station, reset the dumper position and monitored the leakage in ducting. This improvement starts from April 2020. Based on the daily production, the losses now are around 0.081% - 0.082% below the budget 0.096%.
		Increase Output of Dump Truck from 21.8 Ton/Unit to be 25.0 Ton/Unit and the acceleration of the transportation of FFB from 07.00 to 19:00.
		Action Plan Operation:
		➤ Division Assistant.
		> Transport Assistant
		> All Assistant.
		→ Division Assistant and KTU.
		butterfly trap (fruit trap) with a ratio 1:5 (0.2 units/ha). 4. PIC:
		Using rotor slasher to control weeds in path; Increase breeding of natural predator (ants); multiplying natural predator (Sycanus sp); using a net at the base of the palm during planting; making
		Regular engine service and vehicle emissions testing once a year.
		> Installation of 900W KWh meter in each house.
		Use of paper back and forth; use used paper for internal documents.
		3. Program:
		Minimize greenhouse gas effect.
		Regular engine service and vehicle emissions testing once a year.

	during Annual Surveillance Assessment by using the RSPO metrics template.	000-00. At the time of the audit, the RSPO Metrics template has not been finalized. Hence no verification was conducted.				
Criteria 3.3: Operating procedures are appropriately documented, consistently implemented and monitored.						
3.3.1	(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.	, ·	Complied			
		 to Planting cover crops. SOP AA-APM-OP-1100.07-R6 16/02/2017 Menanam Kelapa Sawit; related to Planting Oil Palm. SOP AA-APM-OP-1100.08-R6 11/05/2016 Pengendalian Gulma or Weed control. SOP AA-APM-OP-1100.09. R5 5/09/2016 Pemupukan; related to Fertilizer application. 				
		10. SOP AA-APM-OP-1100.10. R6 23/11/2016 Pengendalian Hama dan Penyakit; explains Pests & Disease Control.				



- 11. SOP AA-APM-OP-1100.11. R1 01/02/2009 Pestisida dan Pengendaliannya; explains for pesticide handling.
- 12. SOP AA-APM-OP-1100.12. R3 23/11/2016 Kastrasi; explains castration (cutting all generative product (male flower, female flower, all fruit, to support vegetative growth) done 5-6 months before being harvested.
- 13. SOP AA-APM-OP-1100.13. R3 04/03/2016 Tunas Pokok for pruning.
- 14. SOP AA-APM-OP-1100.14. R3 16/02/2017 Sensus dan Identifikasi Pokok; explains census and palm identification;
- 15. SOP AA-APM-OP-1100.15. R2 01/10/2010 Sensus Produksi related to production census.
- 16. SOP AA-APM-OP-1100.16. R1 01/02/2009 Konsolidasi Pohon Tumbang; explains provision of support to fallen palm.
- 17. SOP AA-APM-OP-1100.17. R1 23/10/2014 Pengelolaan Air; related to water management.
- 18. SOP AA-APM-OP-1100.18. R3 20/04/2015 Potong Buah related to harvesting.
- 19. SOP AA-APM-OP-1100.19. R1 01/02/2009 Pengelolaan Transport explains FFB Transport.
- 20. SOP AA-APM-OP-1100.20-R6 16/02/2017 Replanting;

Tanjung Selamat POM has established a procedure to process the FFB to become CPO and PK starts from reception of FFB to dispatch of CPO and PK:

- 1. SOP AA-MPM-OP-1400.02.R2 Stasiun Penerimaan for FFB receiving station;
- 2. SOP AA-MPM-OP-1400.03.R1 Stasiun Rebusan for sterilizer;
- 3. SOP AA-MPM-OP-1400.04.R1 Stasiun Pemisahan Berondolan for loose fruit separation;

		4. SOP AA-MPM-OP-1400.05-R1 Stasiun pengadukan dan pengempaan for pressing station;	
		5. SOP AA-MPM-OP-1400.06-R1 Stasiun pemurnian for clarification;	
		6. SOP AA-MPM-OP-1400.07-R1 Stasiun pemisahan nut dan fiber for nut and fiber separation;	
		7. SOP AA-MPM-OP-1400.08-R1 Stasiun kernel for kernel station;	
		8. SOP AA-MPM-OP-1400.09-R1 Stasiun boiler;	
		9. SOP AA-MPM-OP-1400.10-R1 Stasiun engine room;	
		10. SOP AA-MPM-OP-1400.11-R1 Stasiun water treatment;	
		11. SOP AA-MPM-OP-1400.12-R1 Laboratorium;	
		12. SOP AA-MPM-OP-1400.13-R1 Stasiun pengelolaan limbah for palm oil mill effluent treatment;	
		13. SOP AA-MPM-OP-1400.14-R2 Stasiun penimbunan dan pengiriman CPO dan kernel for CPO and PK bulking and despatch operation;	
		14. SOP AA-MPM-OP-1400.15-R1 Perawatan for preventive maintenance;	
		15. SOP AA-MPM-OP-1400.19.R2 Manajemen dan Metode Menghitung Emisi Gas rumah kaca (GHG)	
		16. SOP AA-MPM-OP-1400.18-R4 Book Keeping	
		17. AA-MPM-OP-1400.17-R6 Traceability	
		The mill operational procedures explains the flow process, specification of material and process, machinery and tools required, step-by-step process, control, monitoring and measurement and health and safety requirements.	
3.3.2	A mechanism to check consistent implementation of procedures is in place.	The unit of certification has done monitoring on palm oil mill and estates operation. Monitoring on palm oil mill operation recorded on Visit Engineering (VE) report, e.g. VE report of Tanjung Selamat POM, date of visit 25-28 Sept 2019, report No. VE-PTS-SEP-FULL-03-2019-Full Visit by TCJ Thomas.	Complied

		Monitoring of estate operation recorded in Visit Agronomy (VA) report, e.g. VA report of Tanjung Selamat Estate, date of visit 19-21 Feb 2020, report No. VA-KTS-FEB-FULL-I-2020 by Simon Sihotang.	
		• Sighted VA Report No. VA-KTS-Jan-Full-01-2021 dated 18 – 22 January 2021 by Simon Sihotang. Main issues: circle path cleanliness, interrow (stenochlaena and Panicum sarmentosum founded in Afdeling 1), pest and disease (caterpillar infestation founded).	
		 Sighted Research and Disease visit report No. R&D-P&D-KTS-October-03-2020 dated 1 - 3 October 2020 by David Sinambela. Caterpillar infestation in area ±275 Ha. Generall 1 - 2%, but in block B16b, B16c and B16d more than 10 - 30%. 	
3.3.3	Records of monitoring and any actions taken are maintained and available.	The unit of certification has done monitoring on palm oil mill and estates operation. Monitoring on palm oil mill operation recorded on Visit Engineering (VE) report, e.g. VE report of Tanjung Selamat POM, date of visit 25-28 Sept 2019, report No. VE-PTS-SEP-FULL-03-2019-Full Visit by TCJ Thomas. Issues and Action Plan recorded as follows:	Complied
		1. The lock ring on sterilizer 1 & 3 is not centred correctly, resulting insufficient over lapping of the door lock lugs and the lock ring lugs; the lock ring can work loose, and the door can open when the steriliser is under pressure and result in catastrophic consequences. Action Plan: Position of the lock ring and the door lugs is critical for safety; therefore, routine sterilizer inspection must check the sterilizer lock ring is correctly centred.	
		2. Boiler furnace ash recovered contains high content of hard clinkers because of higher furnace temperatures as result of use of the supplementary biogas burner. Action Plan: Mill must inspect the boiler furnace for indications of effect of higher temperatures due to biogas flames; This is a 'greenfield' installation for the mill, all side effects must be monitored.	



Discharge of sand from the sand trap tank is not properly managed resulting in large quantity of oil remaining uncollected in the oil pit. Action Plan: Mill Assistant must monitor the draining operation of the sand trap tank.

Monitoring of estate operation recorded in Visit Agronomy (VA) report, e.g. VA report of Tanjung Selamat Estate, date of visit 19-21 Feb 2020, report No. VA-KTS-FEB-FULL-I-2020 by Simon Sihotang. Issues and Action Plan recorded as follows:

- 1. Found some palm with narrow circle due to covered by weeds. Action Plan: identification of dominant weed species prior to spraying; Division Assistant shall perform spraying result verification on D+10; if spraying result is not good then rework shall be done 10 days after.
- 2. MOP fertilizer is not applied evenly. Action Plan: Division Assistant shall carry out simulation of fertilizer application correctly; Assistant and/or Mandor 1 must carried out supervision during fertilizer application; Assistant shall carry out verification of fertilizing result on D+1; give sanction to Mandor if found incorrect application.
- 3. Found palm with spear root. Action Plan: performed palm take out.
- 4. Found loose fruit in circle, frond and market place. Action Plan: tightened harvesting supervision by checking quality gradually; routinely performed safari checking by Manager, Assistant, Mandor 1 and Mandor; apply fine to harvester who's not picking loose fruit clearly.

Monitoring of estate operation also done by R&D Department regarding pest and disease, for Tanjung Selamat Estate as reported in R&D-P&D-KTS-MARET-01-2020 by David Sinambela, date of visit 11-12 March 2020. Issues and Action Plan recorded as follows:

Leaf eater caterpillar attack predicted at ± 370 Ha, consist of *P. pendula*, instar 1-2, population > APK (10-15 caterpillar/frond), ± 270 Ha; and *Clania* spp., instar 5-6, population < APK (1-5 caterpillar/frond), ± 100 Ha.



		2. Leaf defoliation at Block B15h, B15i, B16e, and B16f are found high (5-50%). Action Plan: carry out trunk injection for 90 Ha with medium defoliation (5-15%); carry out insecticide spraying using Asefat, concentrate 0.2%; carry out fogging using fungi (biological) <i>Paecilomyces</i> sp and <i>Beauveria bassiana</i> , dosage 100 ml/Ha.	
		Monitoring of estate operation by R&D Department regarding pest and disease, for Pangkatan Estate reported in R&D-P&D-KPT-MARET-01-2020 by David Sinambela, date of visit 11-12 March 2020. Issues and Action Plan recorded as follows:	
		1. New attack of Oryctes rhinoceros was still found in 2 palms at Block B18f. Action Plan: change the spraying method from sleigh shelf to fixed shelf, and apply sanction to those who's not carry out spraying properly.	
		2. New palm attacked by rat found in Block C16i (3.5%) and in Block B19i (1-2%). Action Plan: apply rodenticide racumin selectively in Block B19i and using method test baiting in Block C16i.	
	3.4: A comprehensive Social and Environmental Impact Assessment (Second and monitoring plan is implemented and regularly updated in ongoin	SEIA) is undertaken prior to new plantings or operations, and a social and ag operations.	environmental
3.4.1	(C) SEIA in new planting or operation including mills, is conducted independently and participatively by involving the affected stakeholders, inclusive of impact assessment from the smallholder/outgrower scheme (if any). The assessment is to be documented.	There is no new planting at PT Indo Sepadan Jaya Tanjung Selamat POM and its Supply bases (Tanjung Selamat Estate & Pangkatan Estate). PT Indo Sepadan Jaya The preparation of the SEIA report is based on the Terms of Reference for SEL (KA-SEL) which was approved by the Central AMDAL Commission of the Ministry of Agriculture No. 998/AMDAL/V/1993, May 4, 1993, and the	Complied
		results of field surveys at the study site. Social Impact Assessment was conducted as documented in "Study Evaluasi Lingkungan" which covering social impact assessment. Ministry Agriculture has approved this SEL based on decree No. RC.220/385/B/II/94.	

	T		
		During this audit there is no change and extention related to the mill and estate operation.	
		PT Rantau Sinar Karsa	
		The preparation of the SEL report is based on the Terms of Reference for SEL (KA-ANDAL) which was approved by the Central AMDAL Commission of the Ministry of Agriculture No. 49/AMDAL/V/1993, May 4, 1993, and the results of field surveys at the study site.	
		Social Impact Assessment was conducted as documented in "Study Evaluasi Lingkungan" (SEL) which covering social impact assessment. Ministry Agriculture has approved this SEL based on decree No. RC.220/383/B/II/94 dated 26 February 1994.	
		During SEL, the company conducted stakeholders meeting with surrounding local communities which affected the project, e.g. Public consultation on 12th March 2014 involved representative from 3 villages (Kampung Padang Village, Sennah Village and Perlabian Village) and attended 66 participants.	
3.4.2	For the unit of certification, a SEIA is available and social and environmental management plan and its monitoring have been developed with participation of affected stakeholders.	During audit SEIA document were available. Social and environmental management plan and its monitoring have been developed as per RKL – RPL document. RKL – RPL document is part of SEL document wich has been communicated and involving the affected parties and stakeholder, e.g. Public consultation on 12th March 2014 involved representative from 3 villages (Kampung Padang Village, Sennah Village and Perlabian Village) and attended 66 participants.	Complied
		Social Environment management plan to prevent negative impact such as:	
		- To prevent air quality decrease, company performed action: Reduce exhaust emissions from the engines by maintenance routine engine, the use of anti-dust mask continuously for workers who are near the source of pollutants that exceed the threshold.	
		- To prevent water quality decrease, maintaining green areas along the river banks, do not logging in the river banks area, planting land cover	

		 crop on the cliffs and prone to erosion areas, the use of wastewater for Land Application, solid waste utilization plant (shell, fibre) for fuel. To prevent erosion: land clearing mechanically, land ciover crop planting, terracing in slope. To prevent wildlife habitat disturbance, place signboard to prohibit illegal hunting in conservation area and around estate, awareness to employee and surrounding community to save the protected species. To increase job opportunities, provide employment opportunities to the local community, the provision of supporting infrastructure for public 	
		 economic activities, providing employment opportunities information to the public. To increase in public revenues, maximize the use of local labor, involving the local community as business partners. 	
3.4.3	(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in participatory way.	Implementation of social and environmental management and monitoring plan can be demonstrated as per "Laporan Hasil Pelaksanaan RKL – RPL". Report of RKL – RPL were evaluated and reported each semester to government institution (DLH Kab. Asahan, DLH Provinsi Sumatera Utara, PPE Region Sumatera and Kementrian Lingkungan Hidup dan Kehutanan. Sample seen:	Complied
		- Laporan RKL — RPL semester II tahun 2019, reported to DLH Kab. Labuhan Batu on 30 April 2020.	
		- Laporan RKL - RPL semester II tahun 2019, reported to DLH Sumatera Utara Province on 5 May 2020.	
		- Laporan RKL – RPL semester II tahun 2019, reported to PPE Region Sumatera on 5 May 2020	
		- Laporan RKL – RPL semester II tahun 2019, reported to Ministry of Environment and Forestry on 11 April 2020.	
		Evidence of RKL – RPL report and its reporting evidence to government can be demonstrated during audit.	

		There were no significant changes required in current practices of identification and evaluation of environmental aspect and impact.	
		Environmental management and monitoring has been implemented such as:	
		 Water management by developing Watergate and drainage in peat soil area, water level monitoring to manage the water level in 40 – 60 cm under ground level. 	
		 Waste management according to the best management practice procedure: waste water management, biogas plant installation, hazardous waste management based on regulation 	
		- Boiler and incinerator maintenance to prevent air pollution, emission monitoring for boiler, incinerator and generator set	
		Report RKL – RPL are publicly available for stakeholder to be access and reviewed.	
Criteria	3.5: A system for managing human resources is in place.		
3.5.1	Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives in accordance with the applicable regulation.	Company has a SOP related to new employment recruitment. According on SOP Rekrutment dan Seleksi Karyawan No. SOP: AA-HR-305.2-R0 dated 1 February 2009 regarding " <i>Penerimaan Karyawan Baru</i> " (Recruitment and Employee Selection), the company will accept new employee based on their capabilities and qualifications. This procedure was communicated to all employees in the workplace and stakeholders in November 2019.	Complied
		During the process recruitment the company directly call prospective employees to conducte interviews and explain the employee status, rights and obligations. It is also explained related procedures or processes and stages of employee recruitment. If the employee is accepted as an employee of PT ISJ or PT RSK, the company will be created a working agreement document (PHL or PKWT working agreement) Signed by both parties and the document made by 2 copies, where each party (company and worker) gets 1 copy of the Working Agreement document. The	

	based on interview with the HR Dept., that recruitment of employees are based on analysis of workforce needed and within it has considered the required competencies, experience and expertise required. For this reason, employee acceptance tests and interviews will be conducted. Employee assessments are always carried out every 6 months as a basis for being able to promote positions or levels/groups which will affect to the monthly salary. Taken example of recruitment at Tanjung Selamat Mill on period 2019 and promotion of permanent employee on Pangkatan Estate: 1. Recruitment on 16 April 2019 state by notification letter from Mill Manager dated 15 April 2019 No. 011.MILL-PTS/EXT/IV/2019 to Kadus Dusun Aek Nauli. From the selection process, based on letter of selection on 26 April 2019, there are 4 prospective employees from the Aek Nauli Hamlet on behalf of: Doni Syahputrah, Dedek Riansyah, Rioko Marpaung and Rikson Hutasoit. The four prospective employees have conducted a medical check-up on 27 April 2019 at the Pramita Medan Clinical laboratory. 2. Employee promotion, based on Internal Memorandum of HR Ops. Plantation 1 No. 107/HR-RO1/MEMO/06/2019 dated 25 June 2019, on behalf of Fazar Nduru (Pangkatan Estate employee) starts from 1 July 2019.	
	employee acceptance tests and interviews will be conducted. Employee assessments are always carried out every 6 months as a basis for being able to promote positions or levels/groups which will affect to the monthly salary. Taken example of recruitment at Tanjung Selamat Mill on period 2019 and	
	There are two types of employees that are applied in PT ISJ and PT RSK, which are permanent employees (knowns as SKU-B and SKU-H) and daily workers (known as BHL/PHL). Fixed Employee (SKU-H and SKU-B) is confirmed under the joint work Agreement (PKB), while the Daily worker with the daily work agreement with a minimum validity period of 1 year. Based on interview with the HR Dept., that recruitment of employees are based on analysis of workforce needed and within it has considered the	



1. SOP recruitment and employee selection No. SOP: AA-HR-305.2-r0 dated 1 February 2009 regarding "penerimaan karyawan baru" (recruitment and selection of employee), explained that: When candidates have passed in the process of selection, next recruitment sends the candidate in full data system averis into HR-it) to be made an agreement work (made 2 duplicate and should be sign by candidates in question.

For example:

- Perjanjian Kerja Harian Lepas Daily worker agreement No. 013/PKHL/KTS/12/2020 dated 15 Desember 2020 on behalf of Dervi Sitohang as Child Care worker at pondok batu. This Daily worker agreement has made duplicate.
- Perjanjian Kerja Harian Lepas Daily worker agreement No. 012/PKHL/KTS/08/2020 dated 1 August 2020 on behalf of Dervi Sitohang as Child Care worker at pondok batu. This Daily worker agreement has made duplicate.
- 2. PT Indo Sepadan Jaya Tanjung Selamat POM and Estate and PT Rantau Sinar Karsa Pangkatan Estate has issued the specific labour policy and procedures for temporary workers (PHL/PKWT); The policy and procedure are issued for each unit as below:
 - Tanjung Selamat POM: Memorandum No. 009/Mill-PTS/INT/07/2020 dated 24 July 2020.
 - Tanjung Selamat Estate: Memorandum No. 171/ES-KTS/ MEMO/07/2020 dated 23 July 2020.
 - Pangkatan Estate: Memorandum No. 266/ MEMO/INT/07/ 2020 dated 01 July 2020.
- 3. Company has established a mechanism to handle complaint from external party, as written in "Mekanisme Penanganan Keluhan" complaint handling mechanism (Doc. No.SOP AA-GL- 5005-RO 01) while complaint from internal regulated under "Mekanisme Penyampaian"

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Cuito	26. An Occupational health and cofety (110 C) plan is decreased office	Keluhan dan Penyelesaian Keluhan Karyawan" – Employee' complaint and resolution mechanism (Doc. No.SOP-AA-HR-3008-RO 05). SOP related to the payments No. AA-FA-219.1-R1: "Pengupahan" (Wages) dated 1 January 2008.	
Criteria	3.6: An Occupational health and safety (H&S) plan is documented, effec	tively communicated and implemented.	
3.6.1	(C) All operational activities risks assessed to identify the H&S issues. Mitigation plans and procedures are documented and implemented.	Certificate Holder has established the health and safety policy under "Kebijakan Perusahaan", signed by Managing Director of Asian Agri Group, on 1st December 2019 Point 3. Committed to implement and maintain occupational health and safety management system in compliance with national and international applicable regulation. The policy has not changes during this recertification and surveillance audit. The policy was communicated to all employees and displayed at strategic locations of Mill and Estates and communicated to employees including contractor workers on 21-23 January 2020. OHS risk assessment procedure SOP " <i>Identifikasi bahaya, Penilaian Resiko dan Penentuan Pengendalian</i> " AA-SMK3-02-R0 dated 3 August 2017 was established and implemented for Mill and Estates activities both routine and non-routine activities. Hierarchy of control was considered for planning of	Complied
		risk control. According to the procedure, the OHS risk assessment and analysis must be reviewed once a year. Risk assessment in plantation were available. OHS training has been programmed and provided and balanced with OHS hazard and risk at Mill and Estates. Basic OHS training performed internally	
		by safety officer in charge at mill and estate, the training record and programme related to OHS were sighted and verified during this audit, e.g. licenses for boiler operator, licence for operator of generator set, licence of heavy equipment operator, pesticide training for sprayers, etc.	
		Tanjung Selamat Estate, Tanjung Selamat Mill and Pangkatan Estate have conducted Hazard Identification & Risk Assessment and Control (HIRAC)/Risk Analysis revision and reviewed as well in January 2020. It	

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		consists of a risk assessment, controlling and its control targets. From the results of the review in January 2021, the OHS work program for the period of 2021 was made, where this program is a control to reduce or mitigate the risk of accidents, which included: 1. OHS Inspection: PPE providing, Worker housing inspection. 2. Checking emergency response facilities and infrastructure 3. Safety Training Program: Emergency and Fire Training, Safety Briefing (Routine). 4. Expertise Training Program for several operators (i.e: tractor operators, heavy equipment, welders, turbine engine operators and others. 5. Healthcare: Medical Check Up, POSYANDU (monthly basis), Disease Handling and Awareness.	
3.6.2	(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.	 H&S Plan addressing health and safety risk of people are monitored as below: PPE usage monitoring: PPE monitoring performed in daily basis by each department. PPE monitoring present in "Checklist Penggunaan APD". PPE monitoring period 2020 and 2021 can be demonstrated during audit. OHS inspection conducted each month by OHS expert and team each month. OHS inspection covering: PPE usage inspection, unsafe action and unsafe condition in area of: Workshop, harvesting, spraying working, manuring, housing. OHS inspection schedule 2021 were sighted. SIO Operator: Welder on behalf Indra Fauzi Lubis, certificate No.: S.1842/JL/BINWASK3-PNK3/X/2018 dated 20 Sept 2018. Uji riksa bejana tekan Pangkatan Estate: Kompresor Shark LVP 1075, Pengesahan pemakaian No. 560/02/BT/DSTKT-4/2014. Latest monitoring from Disnakertrans on 31 October 2020, the result is in good condition 	Non Compliance



		Non conformity found during audit:	
		During field visit at Pangkatan Estate it was found the unsafe condition: Broken excavator without track rail operated to move rock material;	
		2. During field visit at Tanjung Selamat Estate Block B16M Afdeling 2: The door plate of the TUS transport truck was torn and could potentially injure the hand;	
		3. During field visit to warehouse and Fire Fighter storage in Pangkatan Estate found several fire extinguisher APAR (5 APAR) was unusable but the inspection checklist showed good condition.	
		4. At workshop Tanjung Selamat Estate It was found that the electric socket installation was damaged but there was still electricity and was not repaired.	
		5. During field visit to Tanjung Selamat POM it was found that 3 Hydrant installation check were not well function and 2 of them were broken. However there is no follow up action on this.	
		6. It was found in area of emergency shower of hazardous waste storage Tanjung Selamat POM, the faucet were broken and not well function.	
		7. Log Out Tag out during maintenance machine/equipment in Tanjung Selamat POM were not implemented.	
		Correction and corrective action has been taken by company to address the issue, see section 3 for details of findings.	
Criteria	3.7: All staff, workers, Scheme Smallholders, outgrowers, and contract w	vorkers are appropriately trained.	
3.7.1	(C) A documented programme that provides training is in place, which is accessible to all staff, workers, scheme smallholders, and outgrowers taking into account gender- specific needs, and which covers applicable aspects of P&C Principles, in a form they understand	The company has a department which is responsible for the training program, which is the Asian Agri Learning Institute. The department has a 2020/2021 training program recorded in the year 2020/2021 training calendar including Estate and Mill.	Complied
	and includes assessment of the training.	Through its employee data (master of Employees) and training data	



personal records, the Asian Agri Learning Institute Department will recommend the Estate and Mill to participate in a training program annually and will also evaluate the effectiveness of the training that has been followed.

The training program is divided into several aspects: technical, Administration, Environments & Sustainability and special certifications and there are also training involving vendors or operational suppliers.

The following is a 2020 period training program for PT ISJ and PT RSK, including:

Technical (Estate):

- 1. Refresh of SOP Handling of pests and diseases-Pengendalian hama dan Penyakit on February to March 2020, target of participants as much as 130 participants.
- 2. Spraying Training; will be held on Mach to May 2020, target of participants as much as 19 participants.

Vendor (Estate and Mill):

- 1. Unlimited Herbicide Application Training, March, June and August 2020 with target of participants as much as 10 participants. In cooperation with PT Syngenta Indonesia vendor.
- 2. Heavy equipment (Operational and Maintenance), will be held on March, July and August 2020, target of participants as much as 6 participants. In cooperation with PT Altrak & Surya Abadi.

Technical (Mill and Workshop)

- 1. Training on the principle in the operation of steam machine, will be held on July 2020 with target participants as much as 48 participants.
- 2. Road maintenance training, will be held on February, March and July 2020 with target of participants as much as 35 participants.

Environmental & Sustainable:



		1. Sustainability awareness (include: traceability, mass balance and HCV), will be held on February, March, May, July and September 2020, target of participantas as much as 38 participants.	
		2. Basic fire training and fire equipment and service, will be held on February and May 2020, target of participants as much as 137 participants.	
		3. Job safety analysis training, will be held on February 2020, target of participants as much as 20 participants.	
		4. Accidents Inspection and observation training, will be held on January – March 2020, target of participants as much as 120 participants.	
		<u>Certification</u> :	
		1. Certification of AK3U, will be held on March 2020 to 13 participants	
		2. Certification for Pesawat aAngkat Angkut Operator, will be held on March 2020 to 5 operators.	
		3. Certification for welder operator, will be held on March 2020 to 20 operators.	
		4. Firs aider certification training, will be held on April 2020 to `15 participants.	
		5. Hyperkes certification on April 2020 to 17 participants.	
		6. Electricians' certification on April 2020 to 10 operators.	
		The company has also conducted training on all health protocol related workers for pandemic Covid-19 on 26-27 March 2020.	
3.7.2	Records of training are maintained, where appropriate on an individual basis.	The training realizes based on the Training calendar period 2019-2020, including:	Complied
		Training of refresh SOP for pest and disease control, implemented on April 3, 2020 and attended by 63 participants.	
		Technical road maintenance training, conducted on 3 May 2020 and attended by 35 participants.	



- 3. Basic Fire training, conducted on 6 November 2019 and attended by 32 participants.
- 4. Traceability training and book keeping for supply chains, conducted on 10 October 2019 and attended by 6 participants from Tanjung Selamat Mill.
- 5. Socialization of Pandemic Covid-19 for all communities/employees of PTS from the housing held on March 26, 2020.
- 6. Basic fire training, conducted on 12 January 2020 and attended by 16 participants
- 7. Firs aiders training, conducted on 10 January 2020 and attended by 27 participants from Pangkatan Estate and Tanjung Selamat Estate.

The company has also made recording for all trainings that have been attended by employees in the recording of "Personal Data Training", sample taken:

- Employees on behalf of Sunarto (mechanical Pangkatan Estate); Has participated in Basic Fire training on 12 January 2020, 3 May 2020 Technical training Road maintenance and date 26 March 2020 socialization of pandemic Covid-19.
- 2. Employees on behalf of Torang Nainggolan (Spraying foreman at Tanjung Selamat Estate); Has participated in Basic Fire training on 12 January 2020, on March 2019 attended of unlimited herbicide application, 10 January 2020 first aider training and date 26 March 2020 socialization of pandemic Covid-19.
- 3. Employees on behalf of Siddik Noval (Upkeep foreman at Tanjung Selamat Estate); Has participated in Basic Fire training on 12 January 2020, 10 January 2020 first aider training and date 26 March 2020 socialization of pandemic Covid-19.

Some documents can be shown at the time of the audit as proof is: the Calendar Training document period 2019-2020, the list of participants

		attending the trainees, and some photographs of the activities at the time of training.	
3.7.3	Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.	Training for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS) has been carried out by company on 8 July 2020. Training attend by participants: Mill Manager, Production clerk, weighbridge clerk, KTU/administration, Dispatch and Sustainability team. Evidence of training can be demonstrated. During interview with mill personel confirmed that they have understand regarding the RSPO SCCS implementation and process in Tanjung Selamat Palm Oil Mill.	Complied
Criteria	3.8: Supply chain requirements for mills.		
Procedur	e note: all requirements are classified as Critical Indicators. However it w	vill not contribute to suspension if there is more than 5 non-compliance within	a principle)
3.8.1	Identity Preserved Module A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.	Tanjung Selamat Palm Oil Mill physically receives and process FFB from certified and non-certified sources, therefore the applicable RSPO Supply Chain Module is CPO Mills: Mass Balance. Not Applicable.	N/A
	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.		
3.8.2	Mass Balance Module A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the	Tanjung Selamat Palm Oil Mill physically receives and process FFB from certified and non-certified sources, therefore the applicable RSPO Supply Chain Module is CPO Mills: Mass Balance. No change in the supply chain module since last assessment.	Complied

	mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.		
3.8.3	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.	PT ISJ – Tanjung Selamat POM is able to provide estimate volume of CPO and PK in a year period and it was recorded by the CB in Public Summary report and Certificate, consists estimate of FFB receiving from Tanjung Selamat Estate, Pangkatan estate and Third Party supplier, Extraction rates, Processing capacity, working hour, utilisation, etc. The actual tonnage produced are recorded in each annual surveillance report.	Complied
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	PT ISJ – Tanjung Selamat POM is a palm oil mill which takes legal ownership and physically handled RSPO certified sustainable oil palm product, therefore the site has been registered in RSPO IT Platform with ID number RSPO_PO1000002607.	Complied
3.8.5	Documented procedures The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following: a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). 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	 PT Indo Sepadan Jaya – Tanjung Selamat POM can demonstrates: Standard Operating Procedures – Traceability (AA-MPM-OP-1400.17.R7) dated 1 October 2019. The procedures cover traceability of CPO and PK, since FFB receiving from Tanjung Selamat and Pangkatan Estate, processing up to shipping of CPO and PK as well as daily production report. The procedure also regulates the internal audit by Sustainability Internal Audit Manager. Traceability records are to be kept for 10 years. Standard Operating Procedure – Book Keeping (AA-MPM-OP-1400.18-R4) dated 25 February 2015. The procedure explains method to check only certified product received. The bookkeeping mass balance issued every 3 months: January-March, April-June, July-September, and October-December each year. Head of Environment and Sustainability will inform to Certification Body in the case of projected overproduction. SOP of Palm Oil Mill operation: 	Complied



be able to demonstrate awareness of the mill's procedures for the
implementation of this standard.

- d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill.
- a. SOP AA-MPM-OP-1400.02.R2, dated 1 September 2011, Stasiun Penerimaan (FFB Receiving Station)
- b. SOP AA-MPM-OP-1400.03.R1, dated 1 February 2009, Stasiun Rebusan (Sterilizer)
- c. SOP AA-MPM-OP-1400.04.R1, dated 1 February 2009, Stasiun Pemisahan Berondolan (Loose Fruit Separation)
- d. SOP AA-MPM-OP-1400.05-R1, dated 1 February 2009, Stasiun Pengadukan dan Pengempaan (Pressing Station)
- e. SOP AA-MPM-OP-1400.06-R1, dated 1 February 2009, Stasiun Pemurnian (Clarification)
- f. SOP AA-MPM-OP-1400.07-R1, dated 1 February 2009, Stasiun Pemisahan Nut dan Fiber (Nut and Fiber separation)
- g. SOP AA-MPM-OP-1400.08-R1, dated 1 February 2009, Stasiun Kernel (Kernel Station)
- h. SOP AA-MPM-OP-1400.09-R1, dated 1 February 2009, Stasiun Boiler
- i. SOP AA-MPM-OP-1400.10-R1, dated 1 February 2009, Stasiun Engine Room
- j. SOP AA-MPM-OP-1400.11-R1, dated 1 February 2009, Stasiun Water Treatment
- k. SOP AA-MPM-OP-1400.12-R1, dated 1 February 2009, Laboratorium
- I. SOP AA-MPM-OP-1400.13-R1, dated 1 February 2009, Stasiun Pengelolaan Limbah (Palm Oil Mill Effluent Treatment)
- m. SOP AA-MPM-OP-1400.14-R2, dated 1 September 2011, Stasiun Penimbunan dan Pengiriman CPO dan Kernel (CPO and PK Storage and Despatch)

		n. SOP AA-MPM-OP-1400.15-R1, dated 1 February 2009, Perawatan (Preventive Maintenance and Repair). PT ISJ – Tanjung Selamat POM is able to demonstrate complete and up-to-date records and report demonstrating compliance with the supply chain's general requirement and modular requirement, including training records. As per Procedure of Traceability (AA-MPM-OP-1400.17-R7), the responsible person in charge to the supply chain system is Mill Manager. During audit, the mill manager was able to demonstrate sufficient knowledge and understanding on RSPO supply chain implementation for palm oil mill. The procedure SOP AA-MPM-OP-1400.02.R2, dated 1 September 2011, Stasiun Penerimaan (FFB Receiving Station) has include receiving of certified and non-certified FFB. The mill uses supply chain Model Mass Balance, contamination is allowed.	
3.8.6	 i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill; ii) Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. iii) Effectively implements and maintains the standard requirements within its organisation. iv) 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. 	As per Procedure of Traceability (AA-MPM-OP-1400.17-R7) chapter 6.7, Sustainability Internal Audit Manager conducted internal audit 2 times in a year, to ensure all operational and documentation activities are comply to the requirement in RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. The site has effectively implemented and maintains the standard requirement by performing internal audit. Latest Internal audit carried out on 7-12 December 2020, against RSPO P&C Indonesia NI 2020 that include Supply Chain requirement. Internal audit report is available, described that there are no nonconformities found.	Complied
3.8.7	Purchasing and Goods In	PT ISJ-Tanjung Selamat POM has demonstrated SOP of Traceability (AA-MPM-OP-1400.7.R6), chapter 5.1 indicates the Weighbridge Clerk has responsibility to input data and print weighbridge card based on "Surat	Complied



- i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.
- ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.
- iii) The mill shall have a mechanism in place for handling nonconforming FFB and/or documents.

Pengantar TBS", covering information e.g. estate name and block number, mill name, date of delivery, product description and quantity, RSPO certificate number, transporter identity and unique identification number.

PT ISJ – Tanjung Selamat POM receive FFB from certified and non-certified source. Certified source consists of own estate, Tanjung Selamat Estate and sister company estate, Pangkatan Estate (PT Rantau Sinar Karsa). Noncertified FFB sourced from third party supplier, e.g.: Roma, UD Ula Tersia, UD Sahabat, William Tanizar and CSV (Create Share Value). Tonnage of certified and non-certified FFB are recorded in Laporan Harian Pabrik (Mill Daily Report).

Standard Operating Procedure – Book Keeping (AA-MPM-OP-1400.18-R4) explains that Head of Environment and Sustainability will inform to Certification Body in the case of projected overproduction.

In the case on non-conforming raw material entering the process, PT ISJ-Tanjung Selamat POM has the mechanism to handle non-conforming material and/or document. PT ISJ-Tanjung Selamat POM demonstrated the simulation on recall of non-conforming material.

Record seen:

- Weighbridge Ticket No. PTSA121102075 dated 24/02/2021; from Tanjung Selamat Estate Div. 4; to PT Indo Sepadan Jaya Tanjung Selamat Mill; Delivery date is 24/02/2021; Commodity is Certified FFB; Net weight 4,350 kg; Block D12a (224 bunches) and D12d (189 bunches) total 413 bunches; certificate no. SPO 620704; Transport Internal; Delivery Note KTSDT9320210224194005; Vehicle register No. BK 9814 EP; Driver Sudung Pardomuan; Batch No. 13-DE100-16462019-24011072.
- Weighbridge Ticket No. PTSA421100770 dated 24/02/2021; from Pangkatan Estate Div. 2; to PT Indo Sepadan Jaya – Tanjung Selamat Mill; Delivery date is 24/02/2021; Commodity is Certified FFB; Net weight 6,075 kg; Block B18i (1,891 bunches); certificate no. SPO



		 620704; Transport Internal; Delivery Note KPTDT3820210224164903; Vehicle register No. BK 9835 YL; Driver Saparuddin Simmatupang; Batch No. 13-DE100-16462019-23011063. Non-Certified: Weighbridge Ticket No. PTSA521101384 dated 24/02/2021; from Bumdes Pangkatan Sejahtera (ST00054); to PT Indo Sepadan Jaya – Tanjung Selamat Mill; Delivery date is 24/02/2021; Commodity is Outside FFB; Net weight 4,128 kg; total 258 bunches; Transport General; Delivery Note 020; Vehicle register No. BK 9138 YM; Driver Alan. 	
3.8.8	Sales and Goods Out The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation): a) The name and address of the buyer; b) The name and address of the seller; c) The loading or shipment / delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation; i) A unique identification number.	PT ISJ-Tanjung Selamat POM has demonstrated SOP of Traceability (AA-MPM-OP-1400.17.R7), chapter 5.2 indicates the Marketing Manager issued Delivery Order (DO) with information: name and address of production unit, name and address of buyer, contract number, type of product transportation (land/sea), distance, type of product (CPO or PK, certified or non-certified), quantity of product, delivery date, product qualification specification (CPO or PK: FFA, water content, dirt, etc.), Supply chain model (Mass Balance). At the Mill, weighbridge operator printed out CPO or PK weighbridge card, based on DO from marketing which indicates: type of commodity, CPO or PK certified or not-certified; source and destination address; Supply Chain model: (Mass Balance); Certificate number of the Mill; date of delivery, Product quality specification (moisture, FFA, dirt); Contract number/DO number; Quantity, Transport detail (driver name, vehicle number); Buyer address. Sample of Sales Documents: - Sales Contract No. 09005/CC24/02/20; dated 25/09/2020; Seller is PT Indo Sepadan Jaya — Tanjung Selamat POM; Buyer is PT Sari Dumai Sejati — Lubuk Gaung; Commodity is RSPO certified CPO; Supply Chain Model is Mass Balance; Quantity is 300,000 kg; Supply Chain Certificate is RSPO 620704.	Complied



- Delivery Order No. 09005/DC24/02/20 dated 25/09/2020; from PT Indo Sepadan Jaya – Tanjung Selamat POM; to PT Sari Dumai Sejati; Commodity is RSPO certified CPO; Supply Chain Model is Mass Balance; Quantity is 300,000 kg; FFA Max 5%; Supply Chain Certificate is RSPO 620704.
- Weighbridge Ticket No. PTSC120100990 dated 26/09/2020; from PT Indo Sepadan Jaya Tanjung Selamat POM; to PT Sari Dumai Sejati; Delivery date is 26/09/2020; Commodity is RSPO Certified CPO; Supply Chain Model is Mass Balance; Quantity is 29,030 kg; FFA 3.82%; Moisture 0.19%; Dirt 0.022%; based on DO No. 09005/DC24/02/20; Transporter is CV Jaya Pertama, BK 9689 CV; Supply Chain Certificate number RSPO 620704; Seal number 4996373-4996379.
- Sales Contract No. 10002/CC24/13/20 dated 12/10/2020; Seller is PT Indo Sepadan Jaya Tanjung Selamat POM; Buyer is PT Hari Sawit Jaya Negeri Lama Dua KCP; Commodity is RSPO certified Palm Kernel; Supply Chain Model is Mass Balance; Quantity is 100,000 kg; Supply Chain Certificate is RSPO 620704.
- Delivery Order No. 10002/DC24/13/20 dated 12/10/2020; from PT Indo Sepadan Jaya – Tanjung Selamat POM; to PT Hari Sawit Jaya – Negeri Lama Dua KCP; Commodity is RSPO certified PK; Supply Chain Model is Mass Balance; Quantity is 100,000 kg; Moisture 8%; Dirt 8%; Supply Chain Certificate is RSPO 620704.
- Weighbridge Ticket No. PTSC220100252 dated 13/10/2020; from PT Indo Sepadan Jaya Tanjung Selamat POM; to PT Hari Sawit Jaya Negeri Lama Dua KCP; Delivery date is 13/10/2020; Commodity is RSPO Certified PK; Supply Chain Model is Mass Balance; Quantity is 25,960 kg; Broken 15.55%; Moisture 7.5%; Dirt 6.90%; based on DO No. 10002/DC24/13/20; Transporter is CV Sekawan Jaya, BK 8197 VN; Supply Chain Certificate number RSPO 620704; Seal number 4997426-4997443.

	1	Donal on color decomposition information manifold and an included as	
		Based on sales document verified, information required are included, as follow:	
		a) The name and address of the buyer: PT Sari Dumai Sejati at Lubuk Gaung; PT Hari Sawit Jaya at Negeri Lama.	
		b) The name and address of the seller: PT Indo Sepadan Jaya at Tanjung Selamat.	
		c) The loading or shipment / delivery date: 26/09/2020 and 13/10/2020 as in Weighbridge Ticket.	
		d) The date on which the documents were issued: 25/09/2020 and 12/10/2020 as in Sales Contract and Delivery Order; 26/09/2020 and 13/10/2020 as in Weighbridge Ticket.	
		e) RSPO certificate number: RSPO 620704 stated in all documents.	
		f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations): Commodity is RSPO Certified CPO or PK and Supply Chain Model is Mass Balance stated in all documents.	
		g) The quantity of the products delivered: 29,030 kg and 25,960 kg as stated in Weighbridge Ticket.	
		h) Any related transport documentation: Weighbridge Ticket No. PTSC120100990 and PTSC220100252.	
		A unique identification number: Sales Contract No. 09005/CC24/02/20; Sales Contract No. 10002/CC24/13/20; Delivery Order No. 09005/DC24/02/20 and 10002/DC24/13/20; Weighbridge Ticket No. PTSC120100990 and PTSC220100252.	
3.8.9	Outsourcing Activities	The mill does not outsource its milling activities.	Complied
	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	The transport for RSPO certified sustainable CPO and PK delivery was carried out by CV Jaya Pertama and CV Sejahtera Abadi Medan for certified	



	 independent third party complies with relevant requirements of this RSPO Supply Chain Certification. ii) The mill shall ensure the following: a) The mill has legal ownership of all input material to be included in outsourced processes 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. c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. 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. 	- "Perjanjian Pengangkutan" No. 02/X/skj-ISJ/2019 dated 1 October 2019 between PT Indo Sepadan Jaya and Pengangkutan Sekawan Jaya regarding transport of CPO and PK.	
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.	The mill has recorded the name and contact detail of all contractors, as follow: - CV Sejahtera Abadi; contact Mr. Darmin Tanudjaja (Owner); address at Jl. Besar Kisaran Desa Sidomulyo Kecamatan Pulo Bandring, Medan.	Complied
		Pengangkutan Sekawan Jaya; contact Mr. Irawan Arifin; address at Rantau Prapat, Sumatera Utara.	



		"Perjanjian Pengangkutan" No. 02/VI/JP-ISJ/2020 dated 4 Juni 2020 between PT Indo Sepadan Jaya and CV Jaya Pertama regarding transport of CPO and PK.	
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.	Standard Operating Procedure – Book Keeping (AA-MPM-OP-1400.18-R4) revision dated 25 February 2015, Chapter 6.5, page 6, mentioned mechanism that Head of Environmental and Sustainability will inform to certification body if there is case of projected overproduction.	Complied
3.8.12	 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. ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock. 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. iv) For Mass Balance Module, the mill: a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis. b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock). 	 Based on review of PT ISJ – Tanjung Selamat POM document and record, the Mill is able to demonstrate complete, up-to-date and accessible records and reports covering all aspects of RSPO Supply Chain Certification Standard requirements. Records and report verified are as follows: Laporan Harian Pabrik (Mill Daily Report); dated 31/12/2020 and 31/01/2021. Book Keeping – monthly mass balance record of FFB processed, CPO and PK production, CPO and PK deliveries for period March 2020 to January 2021. Kartu Timbangan (Weighbridge Card) FFB; Kartu Timbangan (Weighbridge Card) CPO; Kartu Timbangan (Weighbridge Card) PK; The procedure of Traceability (AA-MPM-OP-1400.7.R6), requires that all records and reports related to traceability and book keeping are retained for a period of 10 years. Tanjung Selamat POM uses Mass Balance Module for supply chain. Tanjung Selamat POM has record and balances all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on monthly basis, as shown in Book Keeping Mass Balance Report. Monthly report was generated from weighbridge card, summarized daily in mill daily report, summarized 	Complied

		monthly in Mill Operation Summary, then summarized in Book Keeping Mass Balance Report. Conversion rate is only applied to provide reliable estimation of CPO and PK produced for annual budget. All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system (Book Keeping Mass Balance Report). Tanjung Selamat POM only deliver certified CPO and PK sales from a positive stock. Audit team verified there was no short-selling and/or negative stock at the end of period.	
3.8.13	Extraction Rate The oil extraction rate (OER) and the kernel extraction rate(KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.	The oil extraction rate (OER) and Kernel extraction Rate (KER) are applied to provide reliable estimation of CPO and PK produced for annual budget. OER and KER are set based upon past experience, documented and applied it consistently. Based on "Distribusi Produksi Bulanan Anggaran 2021" budget for 2021 are as follows: OER = 19.75% KER = 4.65%	Complied
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	OER and KER are updated periodically to ensure accuracy against actual performance. Based on daily report dated 31 December 2020, actual OER and KER 2020 are as follows: OER = 19.36% KER = 4.28%	Complied
3.8.15	Processing For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.	Tanjung Selamat POM implement Mass Balance Module. This indicator is not applicable.	N/A

3.8.16	Registration of Transactions 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. 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.	` = ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' '	Complied
3.8.17	Claims The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.	The procedure for claims is stated in SOP for Traceability (AA-MPM-OP-1400.17-R7) dated 1 October 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 Mass Balance model are only stated in sales documents of RSPO certified product.	Complied
General	corporate communications		
4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the	PT Indo Sepadan Jaya is a subsidiary of RSPO registered member PT Inti Indosawit Subur. The corporate communication of PT Inti Indosawit Subur	Complied

	principles of the RSPO. Corporate communication is an 'off-product' claim.	can be seen in the company website, under brand Asian Agri at the address www.asianagri.com .	
4.2	In corporate communications a member is allowed to: Display its RSPO membership status Display the RSPO web address (www.rspo.org) State that the member supports the work of the RSPO State the member's history with regard to the RSPO. Use the RSPO trademark to promote its membership of the RSPO. Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at www.rspo.org' where the link must lead to the member's profile page.	 Corporate communication in Asian Agri website: Display its RSPO membership status: In the website of Asian Agri, it was stated the company is RSPO Member since February 2006. Display the RSPO web address: Not in direct manner. In Asian Agri website, company made a link to RSPO website. State the member supports the work of the RSPO: Not in direct manner. In the website, Asian Agri wrote "In 2006, Asian Agri became a member of the Roundtable of Sustainable Palm Oil (RSPO), a global multistakeholder certification system to develop and implement global standards for sustainable palm oil production. We received our 1st RSPO certification for our estate in 2010, and in 2012, the certification for our smallholder scheme." State the member's history with regards to the RSPO: Yes. In the website of Asian Agri, it was stated the company is RSPO Member since February 2006. Use of RSPO Trademark to promote its membership of the RSPO: in the website, the company does not display RSPO Trademarks and corporate logo. 	Complied
4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Yes. In the Asian Agri website, stated that the company is RSPO Member since February 2006. However, 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.	Yes. In the Asian Agri website, stated that the company is RSPO Member since February 2006. However, 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 their 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, the Asian Agri website did not display the RSPO Corporate Logo.	Complied
Busine	ess to business communications		
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	PT Indo Sepadan Jaya – Tanjung Selamat POM stated in sales documents, e.g. Weighbridge Ticket that the product they sold is RSPO Certified CPO or PK model MB.	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.	It was verified that when selling certified oil palm product, PT Indo Sepadan Jaya — Tanjung Selamat POM stated the supply chain model and certificate number, e.g. in Delivery Order and Weighbridge Card.	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 aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation. b) If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2. 		N/A
5.4	A certified member can provide information to its customers detailing the presence of certified palm oil contained within a product even if it is not eligible for a product-specific under RSPO rules. The end product	PT Indo Sepadan Jaya – Tanjung Selamat POM is not a distributor or wholesaler, the site is a Palm Oil Mill that process FFFB into CPO and PK. Not applicable.	N/A



	must not be labelled as certified or sold in such a way that implies RSPO certification.		
	For example, a retailer or food service company may require 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.		
Busine	ss to consumer communication		
6.1	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.	PT Indo Sepadan Jaya – Tanjung Selamat POM is an RSPO certificate holder with certificate number RSPO 620704 valid until 25 May 2020. The certificate holder sold its oil palm product in bulk, no product label attached. No 'product-specific' claims are used. Not applicable.	N/A
6.2	Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below.	PT Indo Sepadan Jaya – Tanjung Selamat POM is an RSPO certificate holder with certificate number RSPO 620704 valid until 25 May 2020. The certificate holder sold its oil palm product in bulk, no product label attached. No 'product-specific' claims are used. Not applicable.	N/A
6.3	When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.	PT Indo Sepadan Jaya – Tanjung Selamat POM sold its oil palm product in bulk, no product pack are used. Not applicable.	N/A
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	PT Indo Sepadan Jaya – Tanjung Selamat POM communication has not stated information about the claimant's RSPO membership status.	N/A
6.5	Members shall not communicate to consumers' information about their suppliers' RSPO membership status.	The communication of PT Indo Sepadan Jaya – Tanjung Selamat POM has not mentioned to consumers information about their suppliers' RSPO membership status.	N/A

Minimu	95% or above of the oil palm content must be RSPO MB-certified.	PT Inti Indosawit Subur – Buatan I POM produce and sold the RSPO MB Certified 100%.	Complied
	LE B — MASS BALANCE SPECIFIC RULES um Mass Balance content		
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 www.rspo.org.	PT Indo Sepadan Jaya – Tanjung Selamat POM is not a retailer or food service company. Not applicable.	N/A
6.7	Use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorised product-specific claim.	Up to this moment, PT Indo Sepadan Jaya – Tanjung Selamat POM has not use other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products.	N/A
5.6	Use of the RSPO trademark is restricted to claims about RSPO-certified sustainable palm oil products and it is not authorised for use in relation to any other ingredient.	The site sold its oil palm product in bulk, up to this moment, PT Indo Sepadan Jaya – Tanjung Selamat POM has not use RSPO trademark.	N/A



Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.	There is no percentage of non-certified oil palm within the product RSPO MB.	Complied
abelling and trademark (MB)		
Members are allowed to use the RSPO label in one of the following ways: • Surrounded by the text: 'Certified sustainable palm oil'.	PT Indo Sepadan Jaya – Tanjung Selamat POM was not use labelling and trademark in their product. There are no product partial claims.	N/A
 The RSPO label MUST contain the tag 'MIXED'. The tag MIXED designates oil palm products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag 'MIXED' on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim. 		
 The RSPO label can also include the statement: `[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'. 		
 Wherever the RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4 pt (1.4 mm or 0.06 inch). 		
In on-pack communications, the RSPO trademark can be printed anywhere on the pack. Further guidance on use of the trademark is provided in the RSPO Trademark License Terms and Conditions and in Annex 1 of the Rules on Market Communications & Claims document.		

N/A



Messaging ALLOWED in storytelling in product-related communications

RSPO P&C Public Summary Report Revision 11 (Sept 2020)

PT Indo Sepadan Jaya – Tanjung Selamat POM was not messaging in

storytelling in product-related communications. It was verified during audit

	• [Oil palm products]/[palm oil]/[palm kernel oil] from RSPO-certified mills and plantations were mixed with non-certified oil palm products in the supply chain.	through sales contract, DO and dispatch slip (weighbridge card). There are no product partial claims.			
	• The volume of [oil palm products][palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations.				
	In off-product communications, reference to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown in company records is allowed.				
	Messaging NOT ALLOWED in storytelling in product-related communications:				
	• Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product.				
_	Principle 4: Respect community and human rights and deliver benefit Respect community rights, provide equal opportunities, maximise benefits from engagement and ensure remediation where needed.				
•	4.1: The unit of certification respects human rights, which includes respect				
4.1.1	(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, supply chain and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.	which has been ratified by the Managing Director (Kevin Tio). The policy relating to human rights, is explained in point 13, stating that: "The company respects human rights by treating all employees fairly, both in terms of acceptance, valuation, conditions and working environment, as well as representation regardless of tribe, caste, national origin, religion/belief, disability, gender, sexual orientation, membership of trade union political affiliation and/or age".	Non Compliance		
		The company's policy is also published to use posters at any strategic places in the plantations (Tanjung Selamat Estate, Pangkatan Estate and Tanjung			
		making excellence a habit.™			



Selamat Mill. Corporate policy has been socialized/ disseminate to all levels of PT ISJ and PT RSK employees on 21-22 January 2020 (list of participants can be shown) and on stakeholders (including local contractors) on 23-43 January 2020 which was attended by 25 stakeholders.

Separately, the company has also a policy related a Human Rights Defender (HRD), which is stated in the Internal Memorandum No. 049/HO/MEMO/INT/03/20 from Head Operational on 20 March 2020: "Protection against the reporters/defenders of human rights defender from acts of revenge, intimidation and harassment". The socialization of this policy has been done to all employees in each Estate (Pangkatan and Tanjung Selamat Estate) and Tanjung Selamat Mill on 23 March 2020 (list of attendance was available). However, the company has not yet socialized this policy to stakeholders (external related parties) includes supply chain and local communities.

PT Indo Sepadan Jaya has conducted the socialization of Human Right Defender policy to Contractors, Suppliers, local community and Stakeholders on 8 July 2020 and 20 July 2020 and also to Supplier (Supplier TBS), Villages officer staff (kepala Dusun and Sekretaris Desa), contractors (employees transport bus contractors and FFB transporter) and labor union as well attended by 15 participants.

While for the internal parties (all level employees at PT ISJ and PT RSK) has been communicated on on 20 August 2020 in PT RSK attended by 62 participants and at PT ISJ on 7 August 2020:

- To all employees in Tanjung Selamat Estate attended by 47 participants
- To All employees in Tanjung Selamat Mill (krani and mandor) and employee's representative attended by 13 participants.

Non conformity found during audit:

Company has established the policy of Human Right Defender as per "Memorandum No. 049/HO/MEMO/INT/03/20 tanggal 2 Maret 2020 Perihal

		Perlindungan terhadap Pelapor/Pembela Hak Asasi Manusia dari tindakan balas dendam, intimidasi dan pelecehan". The policy has been communicated to all level of workers, however it has not been communicated to supply chain actors and local communities according to RSPO standard. Company has taken action by made correction and corrective action to address the issue. Please see section 3 for details of findings.	
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.	Based on the interview and documents review with the head of the village of Sennah and Tanjung Selamat that PT ISJ and PT RSK there is no any use of employees from mercenaries and paramilitaries use in the operations. Up tothis RAV audit, there is no issue or case related to the acts of violence against the employees of the company.	Complied
Criteria	4.2: There is a mutually agreed and documented system for dealing with	n complaints and grievances, which is implemented and accepted by all affects	ed parties.
4.2.1	(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.	Company has established a mechanism to handle complaint from external party, as written in "Mekanisme Penanganan Keluhan" – complaint handling mechanism (Doc. No.SOP AA-GL- 5005-RO 01) while complaint from internal regulated under "Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan" – Employee' complaint and resolution mechanism (Doc. No.SOP-AA-HR-3008-RO 05). These mechanisms has been communicated to external parties at the time conducting of communication and consultation with stakeholder, contractor and local communities on January 2020. While for the internal parties (all level employees at PT ISJ and PT RSK) has been communicated on 21-22 January 2020 (list of participants can be shown). Through this communication, the company explained about the mechanism of submission of complaints in detail and lasts in two directions (ask-answer/discussion), so if there are illiterate parties can understood.	Complied
		The procedure is how to handling complaint and grievances, the company keeps confidential complainer and whistleblower. Complaint and grievances	

		is recorded in log Book and in "Formulir Pencatatan Keluh Kesah dan Ketidakpuasan".	
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.	Company has established a mechanism to handle complaint from external party, "Mekanisme Penanganan Keluhan" – complaint handling mechanism (Doc. No.SOP AA-GL- 5005-RO 01) while complaint from internal regulated under "Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan" – Employee' complaint and resolution mechanism (Doc. No.SOP-AA-HR-3008-RO 05). These mechanisms have been communicated to external parties at the time conducting of communication and consultation with stakeholder, contractor and local communities on January 2020. While for the internal parties (all level employees at PT ISJ and PT RSK) has been communicated on 21-22 January 2020 (list of participants can be shown). Through this communication, the company explained about the mechanism of submission of complaints in detail and lasts in two directions (ask-answer/discussion), so if there are illiterate parties can understood. The company keeps confidential complainer and whistleblower. Complaint and grievances is recorded in log Book and in "Formulir Pencatatan Keluh Kesah dan Ketidakpuasan".	Complied
4.2.3	The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.	Company is recording each complaint and response provided in the Logbook of "Buku Keluhan Karyawan", where from complaint from external is documented in "Buku Agenda Komplain". Mostly the employee's complaints are complaints about improvements in infrastructure and public facilities. According log book of Buku keluhan karyawan periode 2019, there are several complain form employees and has been responded and the progress of resolution was finished. Taken Sample: • Dated 15 July 2019, complaint from employee namely Kristina Hutapea related to home roof leaks and cracked floors. This	Complied
		Hutapea related to home roof leaks and cracked floors. This complaint was responded and followed up by civil engineering Dept. on 19 July 2019.	



- Dated 14 September 2019, complaint from employee namely Epriaman (harvester) related to cracked bathroom floors and water drain pipes was broken. This complaint was responded and followed up on 18 September 2019.
- Dated 20 March 2020, complaint from employee namely Teguh Cahyono related to home roof leaks. This complaint was responded and followed up on 21 March 2020.
- Dated 6 may 2020, complaint from employee namely Dicky related to living room door broken. This complaint was responded and followed up on 6 may 2020.

Tanjung Selamat Estate:

- Dated 18/12/2020, complaint from Agus Arianto (Afd. I), complaint related to room zinc roof leaking, has been responded on 23/12/2020; replace a leaky tin roof and patches of cracked tiles.
- On 27/12/2020 a complaint from Dicky Dwi Sapto (Afdl. IV), complaint: the bathroom floor and bathtub leaked, was responded to on 29/12/2020 repairing by replacing the floor of Madni's room and patching the bathroom tub with cement.
- On 26/12/2020 a complaint from Heri Susandra (harvester-Afdeling II), complaint: The walls of the house were cracked, this was responded to on 30/12/2020 repairing the walls by patching them with cement.

Tanjung Selamat POM & Pangkatan Estate:

- Date 05/11/2020 complaints from Maruasas, complaints; room zinc roof leaking, has been responded on 09/11/2020 by replacing porous zinc with new ones.
- On 25/11/2020 complaints from Wiwik Pratiwi, complaints; cracked house floors, responded on 29/11/2019 by patching the floor with cement.



Based on *Buku Agenda Komplain*, that there are 2 complaints from stakeholders, including:

1. On 2 June 2020, there are several villagers of Dusun Aek Nauli on Pangkatan Village, visit the Tanjung Selamat Mill to To raise complaints. The complaint delivered is related to the disagreement between the 2 of labor union i.e PUK SP.PP-SPSI as labor union in PT ISJ and PUK F. SPTI as that works as the unloading FFB of the transportation in the Tanjung Selamat Mill.

The company has followed up the complaint by conducting consultation with the PUK. SPTI (Loading and unloading FFB at Tanjung Selamat Mill) on 5 June 2020 and several related parties, including: Kapolsek Bilah Hilir, Danramil Bilah Hilir, Camat Pangkatan, Village Head of Kampung Padang and Chairman of the PUK F. SPTI (Note Meeting attached). Conclusions of the consultations are as follows:

- At this time the unloading processing of outside FFB in PMKS Tanjung Selamat was continued by the management of SPTI led by Husor Silaban until the condition went conducive.
- If the condition is not conducive, then to process the work of unloading outside FFB submitted to the company to take the decision of the party who can do the work of unloading FFB at PMKS Tanjung Selamat.
- The disputes between the management of the PUK chairman F. SPTI (Bpk. Husor Silaban with Yusuf Gurning) were completed internally or through a legal process.
- 2. On 15 November 2019, there are complaints from vilagers of 3 Dusun (Dusun Aek Nauli, Kampung Selamat and Dusun Pardomuan Nauli) and the complaint: the existence of Tanjung Selamat Mill caused pollution and deems of disease carriers. This is due to the waste of Tanjung Selamat Mill channeled to the Tarihoran/Galundan River and the boiler smoke carrying black particles.



This complaint has been responded and verification by the Department of Environment of Labuhanbatu Regency on 28 November 2019. Verification result in the form of "Berita Acara Verifikasi Pengaduan Dugaan Pencemaran dan Kerusakan Lingkungan" was presented to villagers of Kampung Padang and Dusun Aek Nauli, Dusun Pardomuan Nauli and NGO PENJARA (Pemantau Kinerja Aparatur Negara).

Verification results in the form of facts that have been agreed by the all parties (attached), including:

- The DLH (Dinas Lingkungan Hidup Labuhanbatu Regency) said that the Tanjung Selamat Mill (PT ISJ) is allowed to dispose of liquid waste to the river on the condition of accordance with the regulations contained in the license owned by PT ISJ.
- That PT ISJ has provided assistance package Lebaran for the community around the plantation on 17 May 2019 and will give the Christmas Package/New Year in December 2019.
- PT ISJ has been conducting free medical check-up for the people of the Dusun Aek Nauli on 17 May 2019 and than medical check-up in Kampung Selamat and Dusun Pardomuan Nauli will be done next.
- PT ISJ has been conducting the construction of meeting hall of Dusun Aek Nauli phase II and III on 17 May 2019
- PT ISJ is not allowed to have Land Application license and the company has done the dismantling of pipes on 14 May 2018
- Head of Dusun Pardomuan Nauli (Bpk. Martobet Manalu) states that the PT ISJ is less concerned about the environment, both in the handling of clean water and liquid waste streaming to the Kalundang River must comply with the standard quality in accordance with regulations and legislation

The meeting of this verification is witnessed by:

1. Section Head of Environmental Complaint and Dispute Resolution,

		Environment Office Labuhanbatu Regency.	
		3. Section Head of Environmental law Enforcement, Environment Office Labuhanbatu Regency.	
		4. NGO PENJARA (Pemantau Kinerja Aparatur Negara)	
		5. Head of Kampong Padang Village	
		6. Villagers of Dusun Aek Nauli and Dusun Pardomuan Nauli.	
4.2.4	The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.	Company has established a mechanism to handle complaint from external party, as written in "Mekanisme Penanganan Keluhan" – complaint handling mechanism (Doc. No.SOP AA-GL- 5005-RO 01) while complaint from internal regulated under "Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan" – Employee' complaint and resolution mechanism (Doc. No.SOP-AA-HR-3008-RO 05). These mechanisms has been communicated to external parties at the time conducting of communication and consultation with stakeholder, contractor and local communities on January 2020. While for the internal parties (all level employees at PT ISJ and PT RSK) has been communicated on 21-22 January 2020 (list of participants can be shown). Through this communication, the company explained about the mechanism of submission of complaints in detail and lasts in two directions (ask-answer/discussion), so if there are illiterate parties can understood.	Complied
		The procedure is how to handling complaint and grievances, the company keeps confidential complainer and whistleblower. Complaint and grievances is recorded in log Book and in "Formulir Pencatatan Keluh Kesah dan Ketidakpuasan".	
		Based on language samples from some complaints. Of the parties in school, the company has responded in accordance with the word procedure that have been set including meetings in the completion of the complaint, taken examples of complaints or grievance from stakeholder:	
		On 15 November 2019, there are complaints from vilagers of 3 Dusun	



(Dusun Aek Nauli, Kampung Selamat and Dusun Pardomuan Nauli) and the complaint: the existence of Tanjung Selamat Mill caused pollution and deems of disease carriers. This is due to the waste of Tanjung Selamat Mill channelled to the Tarihoran/Galundan River and the boiler smoke carrying black particles.

This complaint has been responded and verification by the Department of Environment of Labuhanbatu Regency on 28 November 2019. Verification result in the form of "Berita Acara Verifikasi Pengaduan Dugaan Pencemaran dan Kerusakan Lingkungan" was presented to villagers of Kampung Padang and Dusun Aek Nauli, Dusun Pardomuan Nauli and NGO PENJARA (Pemantau Kinerja Aparatur Negara).

Verification results in the form of facts that have been agreed by the all parties (attached), including:

- a) The DLH (Dinas Lingkungan Hidup Labuhanbatu Regency) said that the Tanjung Selamat Mill (PT ISJ) is allowed to dispose of liquid waste to the river on the condition of accordance with the regulations contained in the license owned by PT ISJ.
- b) That PT ISJ has provided assistance package Lebaran for the community around the plantation on 17 May 2019 and will give the Christmas Package/New Year in December 2019.
- c) PT ISJ has been conducting free medical check-up for the people of the Dusun Aek Nauli on 17 May 2019 and than medical check-up in Kampung Selamat and Dusun Pardomuan Nauli will be done next.
- d) PT ISJ has been conducting the construction of meeting hall of Dusun Aek Nauli phase II and III on 17 May 2019
- e) PT ISJ is not allowed to have Land Apllication license and the company has done the dismantling of pipes on 14 May 2018
- f) Head of Dusun Pardomuan Nauli (Bpk. Martobet Manalu) states that the PT ISJ is less concerned about the environment, both in the handling of clean water and liquid waste streaming to the Kalundang

Criteria (4.3: The unit of certification contributes to local sustainable development	River must comply with the standard quality in accordance with regulations and legislation The meeting of this verification is witnessed by: 1. Section Head of Environmental Complaint and Dispute Resolution, Environment Office Labuhanbatu Regency. 2. Section Head of Environmental law Enforcement, Environment Office Labuhanbatu Regency. 3. NGO PENJARA (Pemantau Kinerja Aparatur Negara) 4. Head of Kampong Padang Village 5. Villagers of Dusun Aek Nauli and Dusun Pardomuan Nauli. The evidence of meeting can be demonstrated during audit.	
4.3.1	Contributions to community development that are based on the results of consultation with local community are demonstrated.	The program to improve the welfare of the surrounding community is included in the CSR program. In 2021 the company has compiled 15 types of programs, including programs to improve the welfare of the surrounding community, for example: I. Social field, including: • Dhuafa package assistance to Kampung Padang • Providing basic food packages to Dhuafa people in Tanjugn Selamatm Perlabian Village and Padang Village. • Ramadhan Safari activities which include Tanjung Selamat Village, Perlabian Village and Padang Village • Assistance with tambourine equipment in Lestari, Dusun Lestari and Perlabian • Sports equipment assistance (badminton and volley ball) in Kampung Padang II. Health Sector; including:	Complied



- Assistance in providing free medical check-ups to the community in Kampung Padang.
- Procurement of banners and billboards for the prevention of Covid-19 in Tanjung Selamat Village, Perlabian and Padang Village
- Assistance in providing masks for the prevention of Covid-19 in Tanjung Selamat Village, Perlabian and Kampung Padang Village in the context of preventing the transmission of Covid-19
- Provide assistance in spraying disinfectant activities in Tanjung Selamat Village, Labian and Kampung Padang Village.

III. Infrastructure sector, including:

- Assistance for the construction of boreholes and tanks in Aek Nauli Village and Siborong-borong Village
- Assistance for the procurement of air conditioning to the Nurul Iman Mosque as much as 3 units
- Financial assistance to the Al Hidayah Mosque in Tanjung Selamat Village
- Donate buckets and soap for hand washing to Tanjung Selamat Village, Perlabian and Padang Village
- Providing assistanceCreat Share Value (CSV)

The Program Plan is recorded in the CSR Tracking 2020 - 2021 document, including:

Create Share Value (CSV)

- Independent Smallholder Training in Preparation for Certification, will be held in April-May 2021.
- Independent Smallholder Coordination Meeting, will be held in June-September 2021

		 Providing tools and materials for pottery crafts under the business name MN Trampil Pottery Industry in Pulau Intan A Hamlet, Tanjung Harapan Village, which was held on February 26, 2020. Making an Appeal Sign, carried out in May 2021 Pilot KBH assistance, implemented in May 2021 Road Repair Assistance, will be implemented in April-May 2021. Assistance for the repair of Cooperative Office buildings and equipment, will be carried out in April-May 2021. Documentation of the realization of the CSR program can be proven and shown at the time of the Audit in the form of the Asian Agri CSR Project Approval Sheet and Budget Details. 	
Criteria	4.4: Use of the land for oil palm does not diminish the legal, customary	or user rights of other users without their free, prior and informed consent.	
4.4.1	(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed (FPIC) process. Documents related to the history of land tenure and the actual legal or customary use of the land are available.	Chronology of completion of PT Indo Sepadan Jaya and PT Rantau Sinar Karsa HGU: Tanjung Selamat Estate: 1. December 17, 2014; Field examination, research and field monitoring as well as the meeting of "Panitia Pemeriksaan Tanah B" on the application of HGU PT Indo Sepadan Jaya covering 3,347.01 Ha (Kampung Padang Village, Pangkat District, Labuhan Batu Regency) and 531.72 Ha (Tanjung Selamat Village, Kampong Rakyat Regency and Labuhan Batu District., Based on letter dated December 17, 2014, No. 16/BAPHTBH/HGU/XII/ 2014, the result of examination: • Land Area Map (Peta Bidang Tanah) No. 12/12/2014 scala 1:20.000 on August 2014 for covering 3.347,01 Ha location at Labuhan Batu Regency, regarding Location P ermits No. 503.593/79/Ptnh/2014 dated 20 March 2014. • Land Area Map (Peta Bidang Tanah) No. 12A/12/2014 scala 1:10.000 on August 2014 for covering area 531,72 Ha location at Labuhan Batu	Complied



Selatan Regency, regarding Location Permit No. 503.556/BPPTPM/2012 dated 16 August 2012. 2. Letter of application for follow-up of HGU, dated July 21, 2016, no. 084/GL- AAS/EXT/07/16 to Head of Regional Office of BPN Prov. North Sumatra. 3. Letter from PT Indo Sepadan Jaya no. 057/GL-AAS/EXT/08/17 dated 31 October 2017, related request of information to BPN of North Sumatera Province. Responded by BPN of North Sumatera Province through letter no. 1671/8- 12.300/IX/2017 dated 7 September 2017, that mention papers of PT Indo Sepadan Jaya HGU proposals is on process, as follows: • Area of 3,347.02 Ha, located in Kampung Padang Village, Pangkatan District, Labuhan Batu Regency, North Sumatera Province. • Area of 531.72 Ha, located in Tanjung Selamat Village, Kampung Rakyat District, Labuhan Batu Regency, North Sumatera Province. • Area of 117.573 Ha, located in Kampung Padang Village, Pangkatan District, Labuhan Batu Regency, North Sumatera Province. 4. Letter from BPN Regional North Sumatera No. 286/12.300/II/2018 dated 8 February 2018, related invitation to conduct checking, examination and field observation, and meeting "Rapat Panitia Pemeriksaan Tanah B", on 11 to 13 February 2018. 5. Decree of BPN Head No. 3/HGU/BPN.12/XII/2017 on 21 December 2017, related "Pemberian HGU atas nama PT Indo Sepadan Java atas tanah terletak di Kabupaten Labuhan Batu, Provinsi Sumatera Utara" issuance of land use tittle (HGU) of PT Indo Sepadan Jaya, with area 123.915 and 117.573 Ha for Tanjung Selamat Estate, valid for 35 years, based on map no. 07/2016 dated 16 May 2016, covers 123.915 and 117.573 Ha The company has created a timeline in the completion of HGU PT Indo

		Sepadan Jaya from the beginning until the target of on 2021-2022. The progress of the timeline above should be verified at the next audit.	
4.4.2	Copies documents evidencing agreement- making processes and negotiated agreements detailing the FPIC process are available and include: 4.4.2a Evidence that a plan has been developed through consultation and discussion held in good faith with all affected groups within the community, with specific assurances that vulnerable, minority and gender groups are 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.		Complied
	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;	Based on documents review and interview with local government and local communities surrounding the company, it was noted that no customary land or other legal rights within the company areas and in smallholder plantation. In addition, there is no land dispute between the company and communities surrounding their operational areas.	
	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.	Based on documents review and interview with local government and local communities surrounding the company, it was noted that no customary land or other legal rights within the company areas and in smallholder plantation. In addition, there is no land dispute between the company and communities surrounding their operational areas.	
4.4.3	(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).	In 2014, PT Indo Sepadan Jaya has a cadastral measurements that carried out by Badan Pertanahan Nasional of North Sumatera Region and recorded on the Peta Bidang Tanah/Land Area Map; a. Land Area Map No. 12/12/2014, scale 1:20.000; on August 2014, covering área 3,347.01 Ha, location at Labuhan Batu Regency on the location permit No. 503.593/79/Ptnh/2014, dated 20 March 2014.	Complied

		b. Land Area Map No. 12A/12/2014, scale 1:10.000; on August 2014, covering área 531.72 Ha, location at Labuhan Batu Regency on the location permit No. 503.593/79/Ptnh/2014, dated 20 March 2014.	
		Based on Land Title/HGU map, it was noted that no customary rights or user rights within Pangkatan and Tanjung Selamat Estate.	
4.4.4	All relevant information is available in appropriate forms and languages, including assessment of impact, proposed benefit sharing, and legal arrangements.	Based on public consultation with related stakeholder (government agencies of Labuhan Batu Regency and village representatives from Kampung Padang and Sennah) obtain infoemation that there is no customary or indigenous people within the Tanjung Selamat Estate and Pangkatan Estate concession.	N/A
4.4.5	(C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.	Based on public consultation with related stakeholder (government agencies of Labuhan Batu Regency and village representatives from Kampung Padang and Sennah) obtain infoemation that there is no customary or indigenous people within the Tanjung Selamat Estate and Pangkatan Estate concession.	N/A
4.4.6	There is evidence that implementation of agreement negotiated through FPIC is annually reviewed in consultation with affected parties.	Based on documents review and interview with local government and local communities surrounding the company, it was noted that no customary land or other legal rights within the company areas and in smallholder plantation. In addition, there is no land dispute between the company and communities surrounding their operational areas.	N/A
	4.5: No new plantings are established on local peoples' land where it can through a documented system that enables these and other stakeholde	in be demonstrated that there are legal, customary or user rights, without the ers to express their views through their own representative institutions.	eir FPIC. This is
4.5.1	(C) Documents showing identification and assessment of		Complied
	demonstrable legal, customary and user rights are available.	Has obtained the legal ownership of land, history of land tenure ownership/control, and the actual legal use of the land:	
		1. Izin Lokasi (Location Permit) form North Sumatera Governor no. 7550/Sekr/Tahun 1988 (± 3,885 Ha) and no. 593.41/2834/K, year 1989, dated 8 November 1989 ((± 4,500 ha) for Tanjung Selamat	



- estate and no,593.41/2834/K, year 1989, dated 8 November 1989 ((\pm 4,500 Ha) for Pangkatan Estate.
- 2. Izin Lokasi (Location permit): is based on Decree of Bupati Labuhanbatu Regency No. 503.593/35/Ptnh/2014, dated 14 February 2014, concerning Land Location Permit for the purpose of oil palm plantation business to PT Indo Sepadan Jaya located in Kampung Padang Village Pangkatan District, Labuhan Batu Regency with an area of ± 118.4 HKeputusan Menteri Kehutanan on 1 October 1993, no. 578/Kpts-II/1993, related "Pelepasan Sebagian Kelompok Hutan S. Bilah S. Kelundang" yang terletak di Kabupaten Labuhan Batu Propinsi Sumatera Utara seluas 3.475,6 Ha.
- 3. Izin Usaha Perkebunan (Operational Business Permit) from Agriculture Ministry No. HK.350/E4.242/03.89, dated 28th March 1989, renewal no. HK.350/M4.338/04.90, dated 10th April 1990 "Perubahan dan Perpanjangan Persetujuan Prinsip Usaha Perkebunan" become oil palm plantation as ± 3,500 Ha in location Bilah Hilir Regency, District Labuhan Batu, Province Sumatera Utara" for Tanjung Selamat Estate and No. HK.350/ E4.236/03.89, dated 23 March 1989 and renewal IUP from rubber to oil palm plantation no. HK.350/E4.329/04/90 dated 10 April 1990 related renewal "Perubahan dan Perpanjangan Persetujuan Prinsip Usaha Perkebunan" becomes oil palm plantation as ± 3,150 Ha di Bilah Hilir Regency, District Labuhan Batu, Sumut" for Pangkatan estate.
- 4. Renewal IUP in 2013 for Tanjung Selamat estate from Governor of North Sumatera no. 522.2/87/BPPTSU/ 2/1.3/IX/2013, dated 9th September 2013 for + 3,885 Ha dan Mill capacity 45 tonnes FFB/hour.
- 5. IUP no. 522.2/186/BPPTSU/2/1.2/X/2015, dated 30th October 2015 regarding Izin Perluasan Usaha Perkebunan PT. Indo Sepadan Jaya for area 118.4 ha.
- 5. Risalah Pemeriksaan Tanah "B" No. 67/PPT/a/1989, dated on 24th



- November 1989, issued by "Kanwil BPN" North Sumatera Province (+ 3,885 Ha) for Tanjung Selamat Estate; and re-cadastral in 2014 with "Peta Bidang Tanah" no. 12/12/2014, August 2014 (3,347.01 ha) and no. 12A/12/2014, August 2014 (531.72 ha).
- 7. Decree of the Head of the Regional Office of the National Land Agency of the Province of North Sumatra, no. 3/HGU/BPN.12/XII /2017 dated December 21, 2017, concerning: "Granting of Right to Use Business on behalf of PT Indo Sepadan Jaya on Land Located in Labuhan Batu Regency, North Sumatra. HGU for 35 years since this Decree on State Land covering 123,915 Ha located in Kampung Padang Village, Pangkatan District, Labuhanbatu Regency, North Sumatra Province, the location of the plantation is near the Tanjung Selamat Estate POM.
- 8. Decree of BPN Head No. 3/HGU/BPN.12/XII/2017 on 21 December 2017 related "Pemberian HGU atas nama PT Indo Sepadan Jaya atas tanah terletak di Kabupaten Labuhan Batu, Provinsi Sumatera Utara" issuance of land use tittle (HGU) of PT Indo Sepadan Jaya, with area 123.915 and 117.573 Ha for Tanjung Selamat Estate, valid for 35 years, based on map no. 07/2016 dated 16 May 2016, covers 123.915 and 117.573 Ha.

PT Rantau Sinar Karsa:

- 1. Hak Guna Usaha (HGU)/Land title based on SK BPN no. 5/HGU/BPN/90, dated 13 March 1990 (4,336 Ha) with land certificate no. 3, year 1993 for Pangkatan Estate.
- 2. Renewal Hak Guna Usaha (HGU) from Kepala BPN no. 125/HGU/BPN/2004, concerning: Extension of Duration and Renewal of HGU on Land Located in Labuhan Batu Regency, North Sumatra Province (4,336 ha) with Land Certificate (Sertifikat) no. 3, year 1993 (Valid until 31 December 2080)

Based on document verification, management unit has no land expansion since November 2005.

4.5.2	(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions. All the relevant information and documents are made available, and community have option of resourced access to independent third-party advice through a documented, long-term and two- way process of consultation and negotiation.	Based on document verification, management unit has no land expansion since November 2005. Based on documents review and interview with local government and local communities surrounding the company, it was noted that no customary land or other legal rights within the company areas and in smallholder plantation. In addition, there is no land dispute between the company and communities surrounding their operational areas.	N/A
4.5.3	Evidence is available that affected local peoples understand they have the right to say 'agree' or 'not agree' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.	Based on document verification, management unit has no land expansion since November 2005. Based on documents review and interview with local government and local communities surrounding the company, it was noted that no customary land or other legal rights within the company areas and in smallholder plantation. In addition, there is no land dispute between the company and communities surrounding their operational areas.	N/A
4.5.4	To ensure local food and water security and as part of the FPIC process, SEIA participation and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of land allocations process.	Based on document verification, management unit has no land expansion since November 2005. Based on documents review and interview with local government and local communities surrounding the company, it was noted that no customary land or other legal rights within the company areas and in smallholder plantation. In addition, there is no land dispute between the company and communities surrounding their operational areas.	N/A
4.5.5	Evidence is available that the affected communities and rights holders have had the option to access information and advice, that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.	Based on document verification, management unit has no land expansion since November 2005. Based on documents review and interview with local government and local communities surrounding the company, it was noted that no customary land or other legal rights within the company areas and in smallholder	N/A

		plantation. In addition, there is no land dispute between the company and communities surrounding their operational areas.	
4.5.6	Evidence is available that the communities or their representatives gave consent to the initial planning phases of the operations prior to	Based on document verification, management unit has no land expansion since November 2005.	N/A
	the issuance of a new concession or land title to the operator.	Based on documents review and interview with local government and local communities surrounding the company, it was noted that no customary land or other legal rights within the company areas and in smallholder plantation. In addition, there is no land dispute between the company and communities surrounding their operational areas.	
4.5.7	After 15 November 2018, new lands will not be acquired for plantations and mills as a result of recent (after November 2005) expropriations	Based on document verification, management unit has no land expansion since November 2005.	N/A
	in the national interest (eminent domain) without FPIC process, except in cases of smallholders benefitting from agrarian reform or anti-drug programmes.	Based on documents review and interview with local government and local communities surrounding the company, it was noted that no customary land or other legal rights within the company areas and in smallholder plantation. In addition, there is no land dispute between the company and communities surrounding their operational areas.	
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation.	Based on document verification, management unit has no land expansion since November 2005.	N/A
		Based on documents review and interview with local government and local communities surrounding the company, it was noted that no customary land or other legal rights within the company areas and in smallholder plantation. In addition, there is no land dispute between the company and communities surrounding their operational areas.	
	4.6: Any negotiations concerning compensation for loss of legal, custo local communities and other stakeholders to express their views through	mary or user rights are dealt with through a documented system that enable their own representative institutions.	oles indigenous
4.6.1	(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.	Based on documents review and interview with local government and local communities surrounding the company, it was noted the company has existed since 1980. There was no customary land or other legal rights within	Complied

		the company areas and in smallholder plantation. In addition, there is no land dispute between the company and communities surrounding their operational areas. Mechanism to identify and calculate fair compensation or loss of legal or customary rights to land set out in the standard operating procedure (SOP) No. AA-GL-5003-1-R1, dated 5th December 2009 and has undergone first revisions on 22nd August 2011. The mechanism described is similar to conflict resolution procedures involving community representatives and other stakeholders. Furthermore, management unit also had company established procedure to handle complaint from external party, as written in "Mekanisme Penanganan Keluhan" – complaint handling mechanism (Doc. No.SOP AA-GL- 5005-RO 01) while complaint from internal regulated under "Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan" – Employee' complaint and resolution mechanism (Doc. No.SOP-AA-HR-3008-RO 05). These mechanisms have been communicated to external parties and disseminated to PT Indo Sempadan Jaya employees. Based on interview with Tanjung selamat village head, Gender committee leader and worker union leader; they understood the procedure and mechanism to communicating complaint and/or grievance to company. The procedure is how to handle complaint and grievances, the company keeps confidential complainer and whistleblower. Complaint and grievances are recorded in logbook and in "Formulir Pencatatan Keluh Kesah dan Ketidakpuasan".	
4.6.2	(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.	Management unit has a mechanism to identify and calculate fair compensation or loss of legal or customary rights to land set out in the standard operating procedure (SOP) No. AA-GL-5003-1-R1, dated 5th December 2009 and has undergone first revisions on 22nd August 2011. The mechanism described is similar to conflict resolution procedures involving community representatives and other stakeholders.	Complied

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4.6.3	Evidence is available that equal opportunities are provided to both men and women to hold land titles for smallholdings (if possible based on local law, customs and/or agreement).	Based on documents review and interview with local government and local communities surrounding the company, it was noted the company has existed since 1980. There was no customary land or other legal rights within the company areas and in smallholder plantation. In addition, there is no land dispute between the company and communities surrounding their operational areas.	Complied
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 documents review and interview with local government and local communities surrounding the company, it was noted the company has existed since 1980. There was no customary land or other legal rights within the company areas and in smallholder plantation. In addition, there is no land dispute between the company and communities surrounding their operational areas.	Complied
	4.7: Where it can be demonstrated that local peoples have legal, customs, subject to their FPIC and negotiated agreements.	ary or user rights, they are compensated for any agreed land acquisitions and I	relinquishment
4.7.1	(C) A mutually agreed procedure for identifying people entitled to compensation is in place.	Based on documents review and interview with local government and local communities surrounding the company, it was noted the company has existed since 1980. There was no customary land or other legal rights within the company areas and in smallholder plantation. In addition, there is no land dispute between the company and communities surrounding their operational areas.	N/A
4.7.2	(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.	Based on documents review and interview with local government and local communities surrounding the company, it was noted the company has existed since 1980. There was no customary land or other legal rights within the company areas and in smallholder plantation. In addition, there is no land dispute between the company and communities surrounding their operational areas.	N/A
4.7.3		Based on documents review and interview with local government and local	N/A

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		the company areas and in smallholder plantation. In addition, there is no land dispute between the company and communities surrounding their operational areas.	
Criteria	4.8: The right to use the land is demonstrated and is not legitimately con	tested by local people who can demonstrated that they have legal customary	, or user rights.
4.8.1	Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually 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.	Tanjung Selamat Estate Based on information management, verification of documents "Risalah Panitia B" No. 67/PPT/a/1989 dated 24 November 1989 by BPN Regional Office of North Sumatra province and also Hectare Statement mentions an indication that there is no land dispute between the company and the community. On period 2020-2021 there is no dispute occurs at Tanjung Selamat Estate.	Complied
		Pangkatan Estate	
		Based on the results of the public consultation with the Land Office-BPN of Labuhan Batu Regency on 26 March 2019 stated that there is a community claim on the area of HGU PT RSK:	
		That HGU No. 3/Sennah whose rights will expire on December 31, 2020 based on the Decree of the Head of the National Land Agency No. 125 HGU/BPN/2004 dated October 28, 2004 regarding the granting of an extension of the term and renewal of HGU on land located in Kab. Labuhanbatu and has been registered for the extension of the HGU period ending on December 31, 2045 on a land area of 4,336 Ha as described in the measuring letter dated January 5, 1993 No. 151/1993. From this, there is a problem with the demands of 4 (four) farmer groups: Farmers and Fishermen Group, KT Bomban Seberang Seberang, KT Makmur Parduaan, and KT Dusun V, VI, VII for the land with an area of approximately 2,062.16 Ha which is located on the river border. Merbau Afdeling II (map attached).	
		Then the problem was handled by the Mediation team of the Prov. Land Bandan Regional Office. North Sumatra on October 2, 2020 which was attended by all representatives of the parties including the Head of the	

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North Sumatra Province Plantation Service, the Regent of Labuhanbantu, Representatives of PT Rantau Sinar Karsa and the head of Senaah Village as well as the 4 farmer groups concerned, with the following results:

- a) The community has conveyed that PT RSK can pay attention to the demands of farmer groups kelompok
- b) PT RSK is willing to pay attention to the community in accordance with the legal corridor
- c) The farmer groups will submit the details of their wishes and completeness of the documents in writing to the Regional Office of the National Land Agency Prov. North Sumatra in the not too distant future
- d) Further discussions will be held after the Regional Office of the National Land Agency Prov. North Sumatra received details of the wishes and completeness of the documents in writing from each farmer group.

Furthermore, on December 10, 2020, a final degree meeting was held with recommendations/conclusions:

- a) In accordance with the conclusion of the mediation meeting on October 13, 2020, the farmer groups will submit details of their wishes in the near future, but until now (the meeting was held) there are no details desired by the farmer groups. However, on December 8, 2020, the Regional Office of BPN Prov. North Sumatra only received a letter from the Tani Makmur Perduaan group regarding a request for the return of 600 hectares of land.
- b) PT RSK has paid attention to the surrounding community by carrying out social responsibility tasks in accordance with applicable regulations.
- c) Related to the demands of the community represented by KT Makmur Perduaan, KT Fishermen, KT Tani Bomban Seberang Seberang and KT Dusun V, VI, VII Pangkatan Village and KT Teluk Lesung for HGU area no. 3/Sennah registered in the name of PT Rantau Sinar Karsa to take

		legal action because no agreement was reached through mediation. d) Furthermore, the Regional Office of the BPN, North Sumatra Province, stated that: the process of issuing HGU no. 3/Sennah on behalf of PT Rantau Sinar Karsa covering an area of 4,366 hectares located in Pangkatan and Sennah Villages, Bilah Hilir sub-district, Labuhanbatu Regency, Prov. North Sumatra has complied with the applicable laws and regulations and the land is used in accordance with the decree granting its rights, so that if there are parties who object to take legal action. At this time the condition of the land is still cultivated by the community as community land (location map attached).	
4.8.2	(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.	The company has mechanism to resolve land conflict, namely: <i>Penanganan Konflik Lahan</i> SOP No. AA-GL-5003-1-R1, dated 5th December 2009 and has undergone first revisions on 22nd August 2011. Dijelaskan bahwa: "Follow up the completion of the land conflict with line or litigation in land conflicts inform cannot be solved with negotiations". There is no negotiation/compensation payment currently. The company has settled all land compensation since at the beginning of land preparation process. The procedure was described preparation for a meeting with representatives of the public community attention to the various elements of community leaders, informal leaders, women, youth, farmers, etc.	Complied
		The company also gives opportunity for each group to choose a representative in the meeting. Participatory mapping and agreement involving various stakeholders in compensation to the local communities. As an output of dispute settlement process, all of those are documented	
		into agreement between both of parties by involving other related parties or even a copy of court decision for its dispute settlement in case if solved in a court or by law.	
		Based on interviews with local communities that in the period of 2019-2020 until this audit there is no compensation or land compensation activities.	



However, there is a conflict related to the land claim from local communities at PT Rantau Sinar Karsa.

Tanjung Selamat Estate

Based on information management, verification of documents "Risalah Panitia B" No. 67/PPT/a/1989 dated 24 November 1989 by BPN Regional Office of North Sumatra province and also Hectare Statement mentions an indication that there is no land dispute between the company and the community. On period 2018 there is no dispute occurs at Tanjung Selamat Estate.

Pangkatan Estate

Based on the results of the public consultation with the Head of Sennah Village in PT RSK on 19 February 2021 stated that there is a community claim on the area of HGU PT RSK:

That HGU No. 3/Sennah whose rights will expire on December 31, 2020 based on the Decree of the Head of the National Land Agency No. 125 HGU/BPN/2004 dated October 28, 2004 regarding the granting of an extension of the term and renewal of HGU on land located in Kab. Labuhanbatu and has been registered for the extension of the HGU period ending on December 31, 2045 on a land area of 4,336 Ha as described in the measuring letter dated January 5, 1993 No. 151/1993. From this, there is a problem with the demands of 4 (four) farmer groups: Farmers and Fishermen Group, KT Bomban Seberang Seberang, KT Makmur Parduaan, and KT Dusun V, VI, VII for the land with an area of approximately 2,062.16 Ha which is located on the river border. Merbau Afdeling II (map attached).

Then the problem was handled by the Mediation team of the Prov. Land Bandan Regional Office. North Sumatra on October 2, 2020 which was attended by all representatives of the parties including the Head of the North Sumatra Province Plantation Service, the Regent of Labuhanbantu, Representatives of PT Rantau Sinar Karsa and the head of Senaah Village as well as the 4 farmer groups concerned, with the following results:



- a. The community has conveyed that PT RSK can pay attention to the demands of farmer groups kelompok
- b. PT RSK is willing to pay attention to the community in accordance with the legal corridor
- c. The farmer groups will submit the details of their wishes and completeness of the documents in writing to the Regional Office of the National Land Agency Prov. North Sumatra in the not too distant future
- d. Further discussions will be held after the Regional Office of the National Land Agency Prov. North Sumatra received details of the wishes and completeness of the documents in writing from each farmer group.

Furthermore, on December 10, 2020, a final degree meeting was held with recommendations/conclusions:

- a. In accordance with the conclusion of the mediation meeting on October 13, 2020, the farmer groups will submit details of their wishes in the near future, but until now (the meeting was held) there are no details desired by the farmer groups. However, on December 8, 2020, the Regional Office of BPN Prov. North Sumatra only received a letter from the Tani Makmur Perduaan group regarding a request for the return of 600 hectares of land.
- b. PT RSK has paid attention to the surrounding community by carrying out social responsibility tasks in accordance with applicable regulations.
- c. Related to the demands of the community represented by KT Makmur Perduaan, KT Fishermen, KT Tani Bomban Seberang Seberang and KT Dusun V, VI, VII Pangkatan Village and KT Teluk Lesung for HGU area no. 3/Sennah registered in the name of PT Rantau Sinar Karsa to take legal action because no agreement was reached through mediation.
- d. Furthermore, the Regional Office of the BPN, North Sumatra Province, stated that: the process of issuing HGU no. 3/Sennah on behalf of PT Rantau Sinar Karsa covering an area of 4,366 hectares located in Pangkatan and Sennah Villages, Bilah Hilir sub-district, Labuhanbatu

		Regency, Prov. North Sumatra has complied with the applicable laws and regulations and the land is used in accordance with the decree granting its rights, so that if there are parties who object to take legal action. At this time the condition of the land is still cultivated by the community as community land (location map attached).	
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4).	Based on the results of the public consultation with the Head of Sennah Village in PT RSK on 19 February 2021 stated that there is a community claim on the area of HGU PT RSK: That HGU No. 3/Sennah whose rights will expire on December 31, 2020 based on the Decree of the Head of the National Land Agency No. 125 HGU/BPN/2004 dated October 28, 2004 regarding the granting of an extension of the term and renewal of HGU on land located in Kab. Labuhanbatu and has been registered for the extension of the HGU period ending on December 31, 2045 on a land area of 4,336 Ha as described in the measuring letter dated January 5, 1993 No. 151/1993. From this, there is a problem with the demands of 4 (four) farmer groups: Farmers and Fishermen Group, KT Bomban Seberang Seberang, KT Makmur Parduaan, and KT Dusun V, VI, VII for the land with an area of approximately 2,062.16 Ha which is located on the river border. Merbau Afdeling II (map attached). Then the problem was handled by the Mediation team of the Prov. Land Bandan Regional Office. North Sumatra on October 2, 2020 which was attended by all representatives of the parties including the Head of the North Sumatra Province Plantation Service, the Regent of Labuhanbantu, Representatives of PT Rantau Sinar Karsa and the head of Senaah Village as well as the 4 farmer groups concerned, with the following results: a. The community has conveyed that PT RSK can pay attention to the demands of farmer groups kelompok b. PT RSK is willing to pay attention to the community in accordance with the legal corridor	Complied



- c. The farmer groups will submit the details of their wishes and completeness of the documents in writing to the Regional Office of the National Land Agency Prov. North Sumatra in the not too distant future
- d. Further discussions will be held after the Regional Office of the National Land Agency Prov. North Sumatra received details of the wishes and completeness of the documents in writing from each farmer group.

Furthermore, on December 10, 2020, a final degree meeting was held with recommendations/conclusions:

- a. In accordance with the conclusion of the mediation meeting on October 13, 2020, the farmer groups will submit details of their wishes in the near future, but until now (the meeting was held) there are no details desired by the farmer groups. However, on December 8, 2020, the Regional Office of BPN Prov. North Sumatra only received a letter from the Tani Makmur Perduaan group regarding a request for the return of 600 hectares of land.
- b. PT RSK has paid attention to the surrounding community by carrying out social responsibility tasks in accordance with applicable regulations.
- c. Related to the demands of the community represented by KT Makmur Perduaan, KT Fishermen, KT Tani Bomban Seberang Seberang and KT Dusun V, VI, VII Pangkatan Village and KT Teluk Lesung for HGU area no. 3/Sennah registered in the name of PT Rantau Sinar Karsa to take legal action because no agreement was reached through mediation.
- d. Furthermore, the Regional Office of the BPN, North Sumatra Province, stated that: the process of issuing HGU no. 3/Sennah on behalf of PT Rantau Sinar Karsa covering an area of 4,366 hectares located in Pangkatan and Sennah Villages, Bilah Hilir sub-district, Labuhanbatu Regency, Prov. North Sumatra has complied with the applicable laws and regulations and the land is used in accordance with the decree granting its rights, so that if there are parties who object to take legal action.

			condition of the land is (location map attache		y the community as		
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable).	Based on the re Village in PT RSI claim on the area Refer to 4.8.3 abo	Complied				
Principle	5: Support smallholder inclusion						
Include sr	mallholders in RSPO supply chains and improve their livelihoods through	fair and transpare	nt partnerships.				
Criteria !	5.1: The unit of certification deals fairly and transparently with all smallh	olders (Independe	ent and Scheme) and o	other local busine	esses.		
5.1.1	Current and previous period prices for FFB are publicly available and accessible by smallholders.		s displayed the FFB p station, all FFB suppli ne.			Complied	
		The company cooperates with the surrounding community in terms of purchasing FFB and recorded in " <i>Pernyataan dan Jaminan</i> " - Statement and Guarantee as a supplier of FFB. The document stated that:					
		1. FFB that supplied to Tanjung Selamat POM came from land that has been owned/controlled/cultivated in accordance with the legislation, especially in the field of land and plantation.					
		2. FFB supplied	does not originate fro	m unauthorized	areas, such as:		
			d Forest Area				
		b. Industrial Forest Area					
		c. Production Forest Area					
		d. Conservation area External EER Price Information Tanjung Solamat Mill					
		External FFB Price Information Tanjung Selamat Mill For period 3 May 2020 to 1 June 2020					
		Date	Initial Price	Addition /	Final Price		



	(IDR / Kg)	Reduction	(IDR / Kg)
03-May	1.320	-30	1.290
05-May	1.290	-30	1.260
06-May	1.260	-50	1.210
07-May	1.210	-20	1.190
13-May	1.190	-30	1.160
20-May	1.160	-20	1.140
29-May	1.140	+20	1.160
30-May	1.160	+20	1.180
01-Jun	1.160	+20	1.180

The implementation of FFB pricing for the period of 1 June 2020 was verified with the records above and based on these records that the pricing of FFB was in accordance with procedures and applicable regulations as well, it was transparently informed to all independent smallholders.

Record verified:

- 1. "Statement and Guarantee" on behalf of BUMDES Tebing Tinggi Pangkatan Sejahtera (Khairul Anam) as FFB supplier from Dusun Ujung Batu, Tebing Tinggi Pangkatn Village for \pm 941.53 Ha (239 farmers) planting area year 1990.
- 2. Recapitulation of FFB payments for period 2/04/2020:
 - Dated: 2/04/2020, vehicle no. BM 9314 PO, Ticket No.: PTSA520102794, Netto: 9,101 Kg, Price of FFB: 1,406 IDR per Kgs, Total of FFB Price: Rp 12,832,410.
 - Dated: 2/04/2020, vehicle no. BM 9394 PO, Ticket No.: PTSA520102799, Netto: 7,958 Kg, Price of FFB: 1,406 IDR per Kgs,

		Total of FFB Price: Rp 11,220,780. Dated: 2/04/2020, vehicle no. BK 9138 YM, Ticket No.: PTSA520102827, Netto: 6,230 Ton, Price of FFB: 1,406 IDR per Kgs, Total of FFB Price: Rp 8,784,300.	
5.1.2	(C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.	Based on interview with management representative ie. Public affair staff, sustainability and plasma manager obtained information that the actual prices informed directly to the CSV supplier. The company has displayed the FFB price in Mill's notice board in front of the weighbridge station, all FFB suppliers can see it and able to access the FFB price by phone. The FFB prices information also informed and explain by phone and direct message to all FFB supplier by Mill Manager. There is no dispute related to FFB payments so far.	Complied
5.1.3	(C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.	Based on interview with management representative ie. Public affair staff, sustainability and plasma manager obtained information that the actual prices informed directly to the CSV supplier. The actual prices also informed in front of mill gate. There is no dispute related to FFB payments so far. There is no RSPO certified smallholder engage with Tanjung Selamat POM so far.	Complied
5.1.4	(C) Evidences is available that all parties, including women and independent representative organization assisting smallholders where requested, are involved in the decision making processes and understand the contracts. These include involving finance, loans/credits, and re-payments through FFB price reductions for replanting and/or, other support mechanisms where applicable.	so far.	Complied
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe.	There is an agreement in buying and selling FFB between Bumdes Tebing Tinggi Pangkatan Sejahtera and PT Indo Sepadan Jaya, contract number: 01/CSV-KTS/X/2019 dated 24 October 2019 and this agreement is ended until one of the parties terminates the agreement, explained in Article 12, Regarding Term: "Perjanjian ini akan berlangsung sejak ditandatangi dan	Complied



tetap mengikat para pihak sepanjang tidak diakhiri oleh para pihak".

The agreement/contract documents between the company and the contractor is sighted such as for replanting. The contract was acknowledged by both parties and well understood. The contract contained all relevant information such as payment method, work requirements, force majeure, contract period, cancellation of contract, etc. These contract documents are jointly signed and made in duplicate and held by each party (company and supplier).

Regarding FFB pricing, the contract is stated in Article 7; Price of FFB, states: "Harga pembelian TBS dari kebun pihak kedua mengacu pad harga yang berlaku pada saat penjualan TBS kepada pihak pertama. Penetapan harga TBS oleh pihak pertama berdasarkan harga pasar dan harga TBS luar". Price changes will be informed one day before the changes, and it applicable for large size FFB (more than 8 kg). Mechanism for FFB price has been known, understood and explained to FFB suppliers

Determination of the basic price based on the formula, as follows:

```
CPO
           TRANSPO
                         OER CPO from ext.
PRICE
         - RTS
                      x FFB
                                          = X
           TRANSPO
                         OER PK from ext.
PK PRICE - RTS
                      x FFB
                        TOTAL
                                          = XY
                         PROCESSING COST
                         FFB PRICE Bruto
                                                        = XYYY
                         OTHERS COST
                                                        = YX
                                                          XYYY
                         FFB PRICE Bruto
```



		for exa 2020:	for example FFB Price for period 1 - 6 June 2020:							
		7012 4289		750 550			18,5 5,65	= 1.158 = 211	+	
							PROCESSING COST	1.370 = 150		
							FFB PRICE Bruto OTHERS COST		1.22 0 40 -	
							FFB PRICE Bruto		1.18 0	
		Transparently, this agreement was made and witnessed by several stakeholders, including: Tebing Tinggi Pangkat Village Head and Labuhan Batu Office Head and 4 other witnesses consisting of (internal company and local communities). In the contract, it was affirmed related to the legality in Article 6: Rights and obligations of the Second Party, stated: "Pemegang perjanjian ini harus memiliki segala bentuk perizinan yang diperlukan, baik dalam pengelolaan perkebunan kelapa sawit maupun dalam hal pelaksanaan perjanjian ini".								
5.1.6	(C) Agreed payments are made in a timely manner and receipts specifying price, weigh, deductions and amount paid are given.	The ag contract by both informat	reem or is s parti	ent/c sighte ies a such a	contracted such and we as pay	ct c h as II ur mer	in a timely manned documents betwee for replanting. The nderstood. The co nt method, work n of contract, etc.	een the com ne contract was ontract contain	pany and the s acknowledged ned all relevant	Complied



Regarding FFB pricing, the contract is stated in Article 7; Price of FFB, states: "Harga pembelian TBS dari kebun pihak kedua mengacu pad harga yang berlaku pada saat penjualan TBS kepada pihak pertama. Penetapan harga TBS oleh pihak pertama berdasarkan harga pasar dan harga TBS luar". Price changes will be informed one day before the changes, and it applicable for large size FFB (more than 8 kg). Mechanism for FFB price has been known, understood and explained to FFB suppliers

Regarding payments for FFB purchased, this is explained in the Cooperation Agreement document in Article 9; regarding FFB payments, stated:

- 1. Payment of the price of second party FFB, will be made after accounting for the obligations of the second party installment to the first party based on this agreement
- 2. Payment as referred to in paragraph 1 (above) will be made by the first party to the second party within a period of no later than 30 (thirty) working days, after receipt of evidence and supporting documents submitted by the supplier or second party are fully received by the first party.

Record verified:

Recapitulation of FFB payments for period 2/04/2020:

- Dated: 2/04/2020, vehicle no. BM 9314 PO, Ticket No.: PTSA520102794, Netto: 9,101 Kg, Price of FFB: 1,406 IDR per Kgs, Total of FFB Price: Rp 12,832,410.
- Dated: 2/04/2020, vehicle no. BM 9394 PO, Ticket No.: PTSA520102799, Netto: 7,958 Kg, Price of FFB: 1,406 IDR per Kgs, Total of FFB Price: Rp 11,220,780.
- Dated: 2/04/2020, vehicle no. BK 9138 YM, Ticket No.: PTSA520102827, Netto: 6,230 Ton, Price of FFB: 1,406 IDR per Kgs, Total of FFB Price: Rp 8,784,300.

		The FFB payment document can be shown at the time of the audit, in the form of: weigh ticket, FFB payment slip (including: weight Vehicle number, FFB net weight, FFB price for the period, tax payment etc.).	
5.1.7	Weighing equipment is verified by an independent third party on a regular basis.	Calibration of the FFB weigh bridge has been carried out by <i>Balai Standardisasi Metrologi Legal Regional I Dirjen Perlindungan Konsumen dan Tertib Niaga Direktorat Metrologi</i> on 25 September 2019 and recorded of Test Result Statement No. 304/PKTN.4.9/KHP/10/2019 for UTTP types: Bridge Scales, Trademark: Avery Weigh-Tronix; E1205; 114850142 with a capacity of 50,000 kg / 10 kg. This calibration is carried out at least once a year and regularly PT Indo Sepadan Jaya always calibrate the weigh bridge.	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.	There is no independent smallholder or any RSPO certified smallholder engage with Tanjung Selamat POM so far.	N/A
5.1.9	(C) The unit of certification has a grievance mechanism for smallholders, and all grievances raised are dealt with in a timely manner.	Company has established a mechanism to handle complaint from external party, as written in "Mekanisme Penanganan Keluhan" – complaint handling mechanism (Doc. No.SOP AA-GL- 5005-RO 01) while complaint from internal regulated under "Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan" – Employee' complaint and resolution mechanism (Doc. No.SOP-AA-HR-3008-RO 05). These mechanisms has been communicated to external parties and disseminated to PT Indo Sempadan Jaya employees.	Complied
		The procedure is how to handling complaint and grievances, the company keeps confidential complainer and whistleblower. Complaint and grievances is recorded in log Book and in "Formulir Pencatatan Keluh Kesah dan Ketidakpuasan".	
		Based on Buku Agenda Komplain, that there are 2 complaints from	



		Pangkatan The complate parties Pketer transportate 2. On 15 Now (Dusun Aelthe complate and deems Selamat Mismoke carrows This complete for Environ Verification Dugaan Peter Villagers of Nauli and Name Peter Selamat Mismoke Carrows Complete for Environ Verification Dugaan Peter Villagers of Nauli and Name Peter Selamat Mismoke Carrows Complete for Environ Verification Dugaan Peter Selamat Mismoke Carrows Carrow	2020, there are several villager Village, visit the Tanjung Selamat laint delivered is related to the discripa (PUK F. SPTI) that works as tion in the Tanjung Selamat Mill. ember 2019, there are complaints a Nauli, Kampung Selamat and Dustint: the existence of Tanjung Selamat and Dustint: the existence of Tanjung Selamat is due Il channeled to the Tarihoran/Galuying black particles. This is due Il channeled to the Tarihoran/Galuying black particles. The properties and the properties of Labuhanbatu Regency is result in the form of "Berita Acencemaran dan Kerusakan Lingku Kampung Padang and Dusun Aeku KGO PENJARA (Pemantau Kinerja Augon Penjara)	Mill to To raise complete agreement between the unloading FFB of the unloading FFB of the unloading FFB of the unloading FFB of the unload Naulijamat Mill caused pollito the waste of Tarundan River and the britation by the Departion 28 November 20 the ungan" was presented Nauli, Dusun Pardor Aparatur Negara).	aints. the 2 f the usun) and ution njung poiler ment 2019. duan ed to muan				
		During audit the above.	During audit there are 2 grievances recorded, in details shown on 4.2.4 above.						
Criteria !	5.2: The unit of certification supports improved livelihoods of smallholder	rs and their inclu	sion 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.	y (Create Share Value) Program, namely:							
	their interest in Norto certification.	Estate	Farmer Group	Areas (Ha)					
		T. Selamat	Gapoktan Sumber Rezeki	870					



	Tebing Tinggi Pangkatan	150
	Sehati	68
	Koperasi Mandiri Tani Sejahtera	965
	941	
	Asosiasi WJD	700
	Asosiasi KS	500
TOTAL		4.194

The target for the establishment of PT ISJ's CSV is 4,026 Ha and up to December 2020, 4,194 Ha has been realized or 104% has been achieved.

The company has established a CSV coaching program for the 2020 period, the realization of the program until October 2020 is as follows:

- Independent Smallholder Training in Preparation for Certification, will be held in April-May 2021.
- Independent Smallholder Coordination Meeting, will be held in June-September 2021
- Providing tools and materials for pottery crafts under the business name MN Trampil Pottery Industry in Pulau Intan A Hamlet, Tanjung Harapan Village, which was carried out on February 26, 2020.
- Making an Appeal Sign, carried out in May 2021
- Project to making owl cages assistance, implemented in May 2021
- Road Repair Assistance, will be implemented in April-May 2021.
- Rehab assistance and Cooperative Office Equipment, will be implemented in April-May 2021.

The realization CSV Program up to Oktober 2020, as follow:



- Farmer Training in Certification Preparation was carried out on February 7, 2020
- Independent Smallholder Coordination Meetings are held 2 times a year, the last one was in February 2020
- Making an Appeal Sign, in October 2019
- Making of owl cages assistance: Pilot owl cage in November 2019
- Road Repair Assistance in November 2020

Based on an interview with the CSV person in charge (Mr. Hendra Jaminsa) consultation with farmers was carried out on February 7, 2020 which was attended by 32 farmers and farmer group leaders, that there are several expectations from farmers, including:

- Relatively stable FFB price
- BMP coaching assistance in increasing production
- Assistance in maintaining production road access to the factory for smooth delivery of FFB to the mill

- Assistance for production facilities in the form of procurement of 346 tons of fertilizer with payments made on credit for 6 months.
- Repair of production roads and axle roads along 147 Km
- Planting a Host Plan of 100 points for pest and disease control
- Installation of 19 owl cages for rat pest control.

The PT ISJ CSV team has provided guidance to smallholder farmers by conducting several training activities, including:

- Training related to the use of fertilizers on November 26, 2020 was attended by 33 farmers

		 Farmer Training in Preparation for Certification was carried out on February 7, 2020 which was attended by 32 farmers and farmer group leaders. In supporting the legality of smallholder land, PT ISJ has provided assistance in efforts to process the legality of farmers' land to obtain a Certificate of Ownership (SHM), until December 2020 the certificates of SHM that have been owned by farmers are as follows: Owned SHM: 456 Ha Have Village Letter: 3,413 Ha No data yet: 107 Ha. 	
5.2.2	The unit of certification develops and implements livelihood improvement programmes, including at least capacity building to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder).	PT Indo Sepadan Jaya has collaborated with smallholders around plantations and is incorporated in the CSV (Create Share Value) Program, namely: village with a total of 13 farmer groups. In 2021 there is a program to increase the area of CSV area of 140 Ha located in SP4 and SP6. The Company has settled the CSV development program for the period 2020, the realization of the program until December 2020 is as follows:	Complied
		 Farmer Training in Certification Preparation including Group Dynamics training was conducted on April 14 2018. Independent Smallholder Coordination Meetings are held 2 times a year, the last being on February 13, 2020 Harvest counseling to farmers on February 13, 2020 Education related to the prevention of Covid-19 on April 17, 2020 Provided assistance to farmers for road maintenance in the form of providing 383 tons of gravel. 	
		 Counseling on Making Appeal Signborads, in October 2019 Assistance for the procurement of owl (<i>Tyto alba</i>) barn (KBH: kandang Burung Hantu) on August 15, 2019 	

		- Road Repair Assistance in November 2020	
		 Farmer Training in Certification Preparation including Group Dynamics training was conducted on April 14, 2018 and the last was conducted on 10 February 2020. 	
		PT IIS has realized some smallholder expectation, including:	
		- Production facility assistance in the form of fertilizer procurement as much as 346 tons with payment made by credit for 6 months.	
		- Repair of production roads and axle roads along 6 km, Providing assistance to farmers for road maintenance in the form of providing 383 tons of gravel material.	
		- Planting the Host Plan as many points for pest and disease control	
		- Installation of 5 units of owl cages for rat pest control.	
		The PT IIS CSV team has provided guidance to smallholder farmers by conducting several training activities, including:	
		- Training related to fertilizer use on February 26, 2020 was attended by 232 farmers	
		- Farmer Training in Certification Preparation including Group Dynamics training was conducted on April 14 2018 and the last was conducted on 10 February 2020.	
		In supporting the legality of smallholder land, PT IIS has provided assistance in the effort to process the legality of farmers' land to obtain a Freehold Certificate (SHM), until December 2020 the SHM certificates that have been owned by farmers are as follows:	
		- Already have Certificate of SHM (Sertifikat Hak Milik): 106 Ha (12,7%)	
		- Has a Village Letter (SKT/SKGR): 726 Ha (87,3%)	
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	PT ISJ has 7 smallholders who work together and are members of the CSV (Create Share Value) Program, namely:	Complied



Estate	Farmner Group	Areas (Ha)
T. Selamat	Gapoktan Sumber Rezeki	870
	Tebing Tinggi Pangkatan	150
	Sehati	68
	Koperasi Mandiri Tani Sejahtera	965
	BUMDES Sejahtera	941
	Asosiasi WJD	700
	Asosiasi KS	500
TOTAL	<u> </u>	4.194

The target for the establishment of PT ISJ's CSV is 4,026 Ha and up to December 2020, 4,194 Ha has been realized or 104% has been achieved.

The company has established a CSV coaching program for the 2020 period, the realization of the program until October 2020 is as follows:

- Farmer Training in Certification Preparation was carried out on February 7, 2020
- Independent Smallholder Coordination Meetings are held 2 times a year, the last one was in February 2020
- Making an Appeal Sign, in October 2019
- KBH assistance: Pilot owl cage in November 2019
- Road Repair Assistance in November 2020

Based on an interview with the CSV person in charge (Mr. Hendra Jaminsa) consultation with farmers was carried out on February 7, 2020 which was attended by 32 farmers and farmer group leaders, that there are several expectations from farmers, including:

		 Relatively stable FFB price BMP coaching assistance in increasing production Assistance in maintaining production road access to the factory for smooth delivery of FFB to the mill Some of the farmers' hopes have been realized by PT ISJ, including: Assistance for production facilities in the form of procurement of 346 tons of fertilizer with payments made on credit for 6 months. Repair of production roads and axle roads along 147 Km Planting a Host Plan of 100 points for pest and disease control Installation of 19 owl cages for rat pest control. The PT ISJ CSV team has provided guidance to smallholder farmers by conducting several training activities, including: Training related to the use of fertilizers on November 26, 2020 was attended by 33 farmers Farmer Training in Preparation for Certification was carried out on February 7, 2020 which was attended by 32 farmers and farmer group leaders. In supporting the legality of smallholder land, PT ISJ has provided assistance in efforts to process the legality of farmers' land to obtain a Certificate of Ownership (SHM), until December 2020 the certificates of SHM that have been owned by farmers are as follows: 	
		assistance in efforts to process the legality of farmers' land to obtain a Certificate of Ownership (SHM), until December 2020 the certificates of SHM that have been owned by farmers are as follows:	
		- Owned SHM: 456 Ha - Have Village Letter: 3,413 Ha	
		- No data yet: 107 Ha.	
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	The PT ISJ CSV team has provided guidance to smallholder farmers by conducting several training activities, including:	Complied



		 Training related to the use of fertilizers on November 26, 2020 was attended by 33 farmers Farmer Training in Preparation for Certification was carried out on February 7, 2020 which was attended by 32 farmers and farmer group leaders. 	
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	 The CSV Program Achievement Report up to December 2020 has been reported in the Tanjung Selamat plantation annual report and the report has been reviewed in January 2021 which will then be used as a CSV program in 2021. This report can be acces by public. Based on the results of the 2021 CSV report review, the results are as follows: Based on the progress report on the achievement of the CSV program for the 2020 period, the area of the CSV program has reached 4,194 hectares. There are 2 farmer groups that are no longer active, namely the Tebing Tinggi Pangkatan Farmers Group covering an area of 150 hectares and the Sehati Farmers Group covering an area of 68 hectares. Both farmer groups will be eliminated. The 2021 plan will increase the area of 1,014 ha in the WJD Association 	Complied
		 (Wanjuma Sari Dewi) to an area of 1,714 ha The plan in 2021 will increase the area of 100 ha in the KS: "Kebun Sendir!" Association (own estate) to an area of 600 Ha 	
-	e 6: respect workers' rights and conditions		
Protect v	vorkers' rights and ensure safe and decent working conditions.		
Criteria	6.1: Any form of discrimination is prohibited.		
6.1.1	(C) A publicity available non-discrimination and equal opportunity policy is implemented in such way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual	Equal Opportunity policy is stated in "Kebijakan Perusahaan", dated 01st December 2014 "Company Treats employees fairly, whether in terms of acceptance, judgment, conditions and work environment, and	Complied

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orientation, gender identity, union membership, political affiliation or age.

representation irrespective of race, tribe, caste, national origin, religion/faith, disability, gender, sexual orientation, union membership, political affiliation and/or age.

This policy has been informed to all employees and being placed into noticed board in public area and easily accessed.

Company also has SOP about the new employment recruitment. According on SOP: AA-HR-305.2-R0 dated 1 February 2009 about "Penerimaan Karyawan Baru" (Reqruitment and Selection of Employee), the company will accept new employee based on their capabilities and qualifications. This policy has been communicated to worker. The policy describe the organization recognize and respect to the rights of local, migrant or urban worker.

Worker register for mill and estates mentioned that all workers came from different backgrounds (race, religion, gender, etc). Ethnical iversity of worker and during interview with workers, no discrimination was identified based on religion, ethnic, gender. No evidence of discrimination found during the audit. Company provided working tools to the workers, relevant to the nature of the work performed.

These a table of distribution of employees for December 2020 period:

Tanjung Selamat Estate:

Religion	Number of Workers	Percent
Buddhism		0%
Catholics	36	7%
Christianity	206	36%
Hinduism		0%
Muslim	309	58%
Others		0%
Total	551	100%



Race	Number of Workers	Percent	
Aceh	2	0%	
Melayu	5	1%	
Jawa	244	44%	
Karo	5	1%	
Nias	59	11%	
Simalungun	4	1%	
Tapanuli	232	42%	
Total	551	100%	

Status	Number of Workers	Percent	
Male	415	75%	
Female	136	25%	
Total	551	100%	

Pangkatan Estate:

Religion	Number of Workers	Percent
Buddhism		0%
Catholics	213	7%
Christianity	56	36%
Hinduism		0%
Muslim	177	58%
Others		0%
Total	446	81%

Race	Number of Workers	Percent	
Aceh	2	0%	
Bali	1	0%	
Jawa	125	28%	

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Karo	5	1%
Nias	101	23%
Simalungun	2	0%
Tapanuli	210	47%
Total	446	81%

Status	Number of Workers	Percent	
Male	290	53%	
Female	156	28%	
Total	446	81%	

Tanjung Selamat POM:

Religion	Number of Workers	Percent	
Buddhism		0%	
Catholics	3	1%	
Christianity	27	5%	
Hinduism		0%	
Muslim	58	11%	
Others		0%	
Total	88	16%	

Race	Number of Workers	Percent	
Jawa	39	9%	
Karo	1	0%	
Melayu	1	0%	
Minang	1	0%	
Tapanuli	46	10%	
Total	88	20%	

		Status	Number of Workers	Percent	
		Male	83	94%	
		Female	5	6%	
		Total	88	100%	
		discrimination, employer ethnicity, religion, original Based on interview with	th employees at the time of oth of PT ISJ and PT RSK p	y to work regardless on site visit on 23-	of 24
6.1.2	(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against. Evidence includes migrant workers non-payment of recruitment fees.	different backgrounds worker and during inte based on religion, eth during the audit.	I and estates mentioned that (race, religion, gender, etc rview with workers, no discri inic, gender. No evidence c	c). Ethnical iversity mination was identifi of discrimination fou	of ed nd
		the work performed. During interview with v	vorkeras and Labor union cor n PT Indo Sepadan Jaya and	nfirmed that there is	no
6.1.3	The unit of certification demonstrates that the recruitment selection, hiring access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.	SOP Rekrutment dan S February 2009 regardi Selection of Employee) their capabilities and q	lated to new employment receleksi Karyawan No. SOP: Along "Penerimaan Karyawan Elo, the company will accept no ualifications. This procedure orkplace and stakeholders as well accept as well accept and stakeholders.	A-HR-305.2-R0 dated Baru" (Reqruitment a ew employee based ware communicated	1 nd on to



There are two types of employees that are applied in PT ISJ and PT RSK, which are permanent employees (known as SKU-B and SKU-H) and daily workers (known as BHL/PHL). Worker register for mill and estates mentioned that all workers came from different backgrounds (race, religion, gender, etc). Ethnical diversity of worker and during interview with workers, no discrimination was identified based on religion, ethnic, gender. No evidence of discrimination found during the audit.

Fixed Employee (SKU-H and SKU-B) is confirmed under the joint work Agreement (PKB), while the Daily worker with the daily work agreement with a minimum validity period of 1 year.

Based on interview with the HR Dept., that recruitment of employees is based on an analysis of workforce needs and within it has considered, the required competencies, experience and expertise required. For this reason, employee acceptance tests and interviews will be conducted. Employee assessments are always carried out every 6 months as a basis for being able to promote positions or levels/groups wich will affect to the monthly salary.

Taken example of recruitment at Tanjung Selamat Mill on period 2020 and promotion of permanent employee on Pangkatan Estate:

- Recruitment on 16 April 2020 state by notification letter from Mill Manager dated 15 April 2020 No. 011.MILL-PTS/EXT/IV/2020 to Kadus Dusun Aek Nauli. From the selection process, based on letter of selection on 26 April 2020, there are 4 prospective employees from the Aek Nauli Hamlet on behalf of: Doni Syahputrah, Dedek Riansyah, Rioko Marpaung and Rikson Hutasoit. The four prospective employees have conducted a medical check-up on 27 April 2020 at the Pramita Medan Clinical laboratory.
- 2. Employee promotion, based on Internal Memorandum of HR Ops. Plantation 1 No. 107/HR-RO1/MEMO/06/2020 dated 25 June 2020, on behalf of Fazar Nduru (Pangkatan Estate employee) starts from 1 July

		2020.	
6.1.4	Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.	As it is found in company policy that's signed by Managing Director (Mr. Kelvin Tio) on November 26th 2012 and on one part of the policies stated that: "To prevent any sexual or physical abuses happen to women as well as to protect their reproductive rights".	Complied
		There is a gender committee actively meets and discussing general agenda and other issue related to handling sexual harassment, dissemination of sexual harassment prevention.	
		Based on interview with Gender Committee, company has implemented the protection of women reproductive rights, in form of maternal leave, period leave, and regular pregnancy check for female sprayers and strictly prohibit pregnant and/or breastfeeding female worker applying pesticides. The last pregnancy checks on 9 February 2021; in Afdeling I: 36 workers, Afdeling III as many 19 workers, Afdeling IV as many 34 workers and spraying team (TUS) as many 25 workers as well with the result is "negative".	
		When in pregnancy checking there are confluence workers who stated "positive", then based on the company's policy above, the woman workers to be transferred to other work whice not related to chemistry (spray or fertilizing).	
6.1.5	(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.	The company has formed a Gender Committee at Tanjung Selamat Estate and Mill which is chaired by Romasi Banjarnahor and Ms. Ratna Dewi Ginting as a secretary, based on the Gender Committee Organizational Structure as of 26 August 2014. Coordinators are assigned at each Afdiling; Afdeling 1: Ms. Katarina Hutasoit, Afdeling 2: Ms. Misnawati, Afdeling 3: Ms. Find Dahlia Manurung and Afdeling 4: sdri. Ratih Pratiwi and membership are all female workers in PT ISJ and SSR. On 2020 Gender Committee Work Program has been established including	Complied
		the issues that will be discussed at the meeting, including: - Defending and quaranteeing the rights of women workers	

		 Carry out routine immunization of children to mothers who have toddlers Conduct family health education with environmental cleanliness The regular monthly gender committee meeting was held on 23 March 2020 	
		which discussed the protection of the rights of women workers from the company, the meeting was attended by 14 representatives of women workers from each affair (a list of attendance can be shown at the time of the audit). Based on the records of the routine meeting and interviews with management, that during the period 2019-2020 there were no cases related to women workers.	
6.1.6	There is evidence of equal pay for the same work scope.	Company has state about the wages for workers base on Decree of Gubernur North of Sumatera SK no. 188.44/719/KPTS/2019, dated 20 November 2019; regarding: "Penetapan Upah Minimmum Sektoral Kabupaten Labuhan Batu Tahun 2020" amount of Rp 3,284,500. The company composes the structure and scale of the 2020 wage period based on Permenaker No. 1 of 2017. This wage scale structure is a determination of the amount of wages for permanent workers (SKU-B) based on class, rank/position.	Complied
		The Company has already set wage standard based on wages set by the government recorded on Memorandum no. ###/HR-R01/MEMO/04/2020, dated 12 January 2020; regarding: "Kenaikan Upah Pekerja Golongan SKUB" and also the determination of the daily wage for BHL (Daily workers) and PKWT employees (certain time workers). On this memorandum is also determine regarding structure of wage for each level worker (SKU-H and AKU-B). The company is also gives a scripts/slip salary to employees before salary is given, salary slip also contains basic salary, allowances, premium, labor health coverage (BPJS Ketenagakerjaan and Kesehatan) and deduction as well.	



Taken sample of salary slip for period March 2020. Based on sample salary slip, confirmed that the company has paid wages employees salary according to the working days and it is applied in a fair to all employees.

The period of 2020 is the determination of the minimum wage based on the Governor's Decree no. 188.44//17/KPTS/2020, dated January 13, 2020; concerning: "Sectoral Minimum Wage for Labuhanbatu Regency in 2020 is IDR 3,284,500 per month. Meanwhile, for the 2021 period, a letter from the Head of the Manpower Office (Kadisnaker) of Labuhanbatu Regency has been issued with the number: 560/0190/DTK-4/2021, dated February 8, 2021 Regarding: suggestion for Discussion on 2021 Workers' Wages, which is addressed to a number of companies in Labuhanbatu Regency.

So that in surveillance audit 2 currently still using a sample of wage payments for the period November - December 2020, and using the Governor's Decree no. 188.44//17/KPTS/2020, dated January 13, 2020; concerning: "Sectoral Minimum Wage for Labuhanbatu Regency in 2020 is IDR 3,284,500 per month.

The payroll process has been determined by the company based on the Decree of the Governor of North Sumatra which requires a minimum wage for workers. The period of 2020 is the determination of the minimum wage based on the Governor's Decree no. 188.44//17/KPTS/2020, dated January 13, 2020; concerning: "Sectoral Minimum Wage for Labuhanbatu Regency in 2020 is IDR 3,284,500 per month.

So that in surveillance audit 2 currently still using a sample of wage payments for the period November - December 2020, and using the Governor's Decree no. 188.44//17/KPTS/2020, dated January 13, 2020; concerning: "Sectoral Minimum Wage for Labuhanbatu Regency in 2020 is IDR 3,284,500 per month.

The determination of the 2018 budget harvest premium is based on the Average Janjang Weight (BJR) and based on the topography of the land (flat-wavy, bumpy-hilly, hilly-mountainous), for example for BJR for

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Tanjung Selamat Estate of 14 Kg, official ready for wholesale: Rp 8000, (flat-wavy land class) 92 janjang and premium over stale Rp. 637 / janjang.

The salary structure consists of: Basic salary, rice allowance, other non-fixed allowances/overtime, Jamsostek premiums and deductions.

Take for example the Wage Payment List and salary slip for the February 2021 period

1. Empl. Name : Wahyu Nababan (PHL) PMKS Tanjung Selamat.

Position : Process in PMKS Tanjung Selamat Periode

February 2021

Work day : 19 days,

Basic Sallary : IDR 2.496.220 (@ Rp 131.380 per day);

Premium Process : IDR 2.477.614,-BPJS TK : IDR 65689,-BPJS Kesehatan : IDR 30.100,-

Deductions : IDR 1.892.154 (Jamsostek and pension);

Net Sallary : IDR 4.845.200.

2. Empl. Name : Sukisno (PHL-daily worker) Tanjung Selamat

Position : Harvester, Tanjung Selamat Estate, Afdeling 3

Periode February 2021

Work day : 21 days,

Basic Salary : IDR 2.758.980 (@ Rp 131.380 per hari);

Premium Process : IDR 3.676.792
BPJS TK : IDR 65.689
BPJS Kesehatan : IDR 30.250

Potongan : IDR 95.939 (Jamsostek dan pensiun);

Gaji bersih : IDR 6.296.988

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Criteria 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).

(C) Documentation of pay and working conditions in accordance with applicable labour laws are available to the workers in national languages and explained to them in language they understand.

The company have established work agreement for permanent employees through joint work agreement (PKB-Perjanjian Kerja Bersama) in term for 2 years. During the audit the PKB is for period of 2018 – 2020 and has done registered by Dirjen PHI/JSK the Ministry of Employment on 4 July 2018.

The renewal of PKB or working agreement for 2021 - 2023 are still under process of approval and registration to Ministry of Manpower. According the provisions in the PKB it is stated that if the new PKB is not yet available, the old PKB is still valid to be used as a reference.

The company has set employment provisions in accordance with the rules and legal ruquirement. It is stated on employment contract off daily labour on article 1 about the types of work, working hours (maximum 40 hours per week and working from Monday to Saturday) and the wages has provides is based on waging regulation (Decree of Governor of North Sumatera) in effect at January 2020. Statements about wages, stated in PKB in Article V concerning Wages-Upah; stated: "Pekerja harian Tetap dan Pekerja Bulanan diberi upah berupa uang yang ditetapkan berdasarkan kesepakatan bersama dengan BKS-PPS dengan PD.FSP.PP-SPSi Propinsi yang bersangkutan sesuai dengan peraturan perundangan Otonomi Daerah yang berlaku, yaitu upah uang ditambah beras pekerja senilai/sejumlah 15 Kg (Upah BKS-PPS), dengan mengingat situasi ekonomi dan kemampuan perusahaan".

The Joint working Agreement (PKB 2018-2020 period) and the daily labour contract of the wage was presented in Bahasa Indonesia, so all employees can understand it and this PHL work agreement is handed over to the workers concerned after being described by the management (through KTU), so that employees who can not read the writing can understood.

Based on the *Berita Acara Serah Terima Perjanjian PHL* dated 6 January 2020, there are as many as 20 BHL workers who have accepted this PHL

Complied

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		work agreement for example: Working Agreements of DUI No.	
		work agreement, for example: Working Agreements of PHL No. 001/PKHL/KTS/01/2020 on behalf of Sunardi and Working Agreement of PHL No. 002/PKHL on behalf of Doni Syahputrah.	
		Determination of wage for period 2020 is based on Decree of Gubernur North of Sumatera SK no. 188.44/719/KPTS/2019, dated 20 November 2019; regarding: "Penetapan Upah Minimmum Sektoral Kabupaten Labuhan Batu Tahun 2020" amount of Rp 3,284,500.	
		The Company has already set wage standard based on wages set by the government recorded on Memorandum no. ###/HR-R01/MEMO/04/2020, dated 12 January 2020; regarding: "Kenaikan Upah Pekerja Golongan SKUB" and also the determination of the daily wage for BHL (Daily workers) and PKWT employees (certain time workers). On this memorandum is also determine regarding structure of wage for each level worker (SKU-H and AKU-B).	
6.2.2	(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed.	The Joint working Agreement (PKB 2018-2020 period) and the daily labour contract of the wage was presented in Bahasa Indonesia, so all employees can understand it and this PHL work agreement is handed over to the workers concerned after being described by the management (through KTU), so that employees who can not read the writing can understood. Based on the <i>Berita Acara Serah Terima Perjanjian PHL</i> dated 6 January 2020, there are 20 BHL workers who have accepted this PHL work agreement, for example: Working Agreements of PHL No. 001/PKHL/KTS/01/2020 on behalf of Sunardi and Working Agreement of PHL No. 002/PKHL on behalf of Doni Syahputrah. Determination of wages (including benefits and other bebefit), working hours (including hours and overtime pay) and working days have been regulated in the PKB Period 2018-2020 in Article V; <i>Upah</i> - Wages, which	Complied
		explains: a) Permanent workers are given wages, the value of which is determined by the employer on the condition that it is not lower than government	

		regulations. b) Certain permanent workers are given wages (Basic Salary and Rice) in accordance with the status of the group/level whose value is determined by the employer with provisions not lower than government regulations c) Permanent workers receive additional wages (UMP / UMSK) and / or attendance incentives as stipulated further in separate provisions.	
		Rice allowance is: 9 kg and each anal (maximum 3 children) is given 7.5 kg per month, which consists of the basic salary and rice allowance. Rice supply is given once a month. Rice supply is intended to be of good quality and is considered appropriate for the health of the Worker and the gift is linked to attendance.	
		Provisions on holidays and leave (both maternity leave and menstruation leave) have been regulated in Article VIII regarding Non-working Days; including: absenteeism, rest days of the week, official holidays, annual leave, maternity leave and others.	
		The company is also gives a scripts/payslip to employees before salary is given, salary slip also contains basic salary, allowances, premium, labor health coverage (BPJS Ketenagakerjaan and Kesehatan) and deduction as well. During audit taken sample of salary slip for period March 2020. Based on sample salary slip shown that the company has paid wages employees salary according to the working days and it is applied in a fair to all employees.	
6.2.3	(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, and other legal labour requirements.	The Joint working Agreement (PKB 2018-2020 period) and the daily labour contract of the wage was presented in Bahasa Indonesia, so all employees can understand it and this PHL work agreement is handed over to the workers concerned after being described by the management (through KTU), so that employees who can not read the writing can understood. Based on the <i>Berita Acara Serah Terima Perjanjian PHL</i> dated 6 January 2020, there are as many as 20 BHL workers who have accepted this PHL	Complied



work agreement, for example: On behalf of the Treaty of PHL No. 001/PKHL/KTS/01/2020, on behalf of Sunardi of the Treaty of PHL No. 002/PKHL. However, this must be done directly with direct verification to the PHL employees (will be conducted at the time of the visit audit).

The company has set employment provisions in accordance with the rules and legal ruquirement. It is stated on employment contract off daily labour on article 1 about the types of work, working hours (maximum 40 hours per week and working from Monday to Saturday) and the wages has provides is based on waging regulation (Decree of Governor of North Sumatera) in effect at January 2020.

Determination of wages (including benefits and other bebefit), working hours (including hours and overtime pay) and working days have been regulated in the PKB Period 2018-2020 in Article V; *Upah* - Wages, which explains:

- a) Permanent workers are given wages, the value of which is determined by the employer on the condition that it is not lower than government regulations.
- b) Certain permanent workers are given wages (Basic Salary and Rice) in accordance with the status of the group/level whose value is determined by the employer with provisions not lower than government regulations
- c) Permanent workers receive additional wages (UMP / UMSK) and / or attendance incentives as stipulated further in separate provisions.

Rice allowance is: 9 kg and each anal (maximum 3 children) is given 7.5 kg per month, which consists of the basic salary and rice allowance. Rice supply is given once a month. Rice supply is intended to be of good quality and is considered appropriate for the health of the Worker and the gift is linked to attendance.

Provisions on holidays and leave (both maternity leave and menstruation leave) have been regulated in Article VIII regarding Non-working Days;

		including: absenteeism, rest days of the week, official holidays, annual leave, maternity leave and others. Provisions related to manpower have fulfilled the laws and regulations namely UU No. 13 of 2003 concerning Manpower - Ketenagakerjaan.	
6.2.4	(C) The unit of certification provides adequate housing. Sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.	The company has provided public facilities for its employees in the form of: Housing, Child Care Center-BPA, electricity supply (gensets) for housing and clean water supply, clinics, sports facilities, employee halls, provision of school buses for houses of worship (mosques and churches) etc. The list of public facilities include: PMKS Tanjung Selamat: - Emplacement – Employee Housing (type: E1: 190 units, E2: 78 units, D1: 12 units) - Employee hall (1 unit) - Clinic (1 unit) - Chirch (1 unit) - Child care (2 units) Tanjung Selamat Estate: - Emplacement – Employee Housing (type: E4: 200 unit, E2: 100 unit, D1: 12 unit) - Elementary school (1 unit) - Clinic (1 unit) - School bus (2 unit) - Ambulance (1 unit) - Mosque (5 unit) - Church (3 unit)	Complied



Pangkatan Estate:

- Employee housing (type: C121: 4 unit, CM: 1 unit, C1: 4 unit, D1-semi permanent: 16 doors, D2- semi permanent: 4 doors, D2 kayu: 20 doors, E1-semi permanent: 54 doors, E2 kayu: 100 doors, E40: 198 doors, etc.)
- Elementary school (1 unit SD Bina Dharma)
- Clinic (1 unit)
- Scool bus (2 unit)
- Ambulance (1 unit)
- Mosque (3 unit)
- Church (1 unit)
- Sports field (2 units of football, 1 unit of badminton, 1 unit of volleyball)
- 3 units of Child care (location in: main camp, merbau, pulau intan)
- Electricity by 3 units Genset
- Clean water using 3 drilled wells (main camp, merbau, diamond island)
- Landfill at Block C91s

The Company has provided a clinic at the plantations and has permit from Dinas Penanaman Modal dan Pelayanan Terpadu Satu Pintu namely "*Surat Izin Operasional Klinik Pratama Klinik Asian Agri Sehat Aek Nabara"* No. 503.445.1/177/DPMPSTP-BP4/2017 dated 7 November 2017 and valid for 5 years. The company also provides a doctor who is responsible in clinik on behalf of dr. Nahdhia and has permit "Surat Izin Praktik (SIP) Dokter from Dinas Penanaman Modan dan Pelayanan Terpadu Satu Pintu No. 503.446.1/283/DMPMTSP-BP4/2017 dated 5 December 2017 and valid until 11 September 2023.

6.2.5	The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.	This w	Worker receives rice by organization that was distributed twice a month. This was mentioned in the "Collective Work Agreement" (PKB) between employees and the organization.		
		Local ı	In addition, organization has provided special area in place for local market. Local market provides food for worker. The market is nearby the company site and company also provide minimarket, namely "Waserda Bina Mandiri"		
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.	Guber Noven	Company has state about the wages for workers base on Decree of Gubernur North of Sumatera SK no. 188.44/719/KPTS/2019, dated 20 November 2019; regarding: "Penetapan Upah Minimmum Sektoral Kabupaten Labuhan Batu Tahun 2020" amount of Rp 3,284,500.		
		The Company has already set wage standard based on wages set by the government recorded on Memorandum no. ###/HR-R01/MEMO/04/2020, dated 12 January 2020; regarding: "Kenaikan Upah Pekerja Golongan SKUB" and also the determination of the daily wage for BHL (Daily workers) and PKWT employees (certain time workers). The company is also gives a scripts/slip salary to employees before salary is given, salary slip also contains basic salary, allowances, premium, labor health coverage (BPJS Tenaga kerja and Kesehatan) and deduction.			
		given	The company also made calculations related to DLW, based on the wages given to employees as costs given by the company: Following is DLW Calculation:		
		No. In Kind Benefits Total			
		1.	Housing (Cost of Building: 30 years) + (Annual Maintenance: Number of Houses) ÷ 12 Months	255,430	
		2.	Electricity & Water (Annual cost of water & eleticity ÷ Number of houses) ÷ 12 Months	248,717	



Total Value of Prevailing Wage 3,3				
	2,693,286			
	Total Cost of In Kind Benefits	643,943		
7.	Sport & Recreartion Facilities	3,432		
6.	Food	54,801		
٥.	materials, ambulance transport cost + cost of helathcare workers) ÷ Number of workers	407		
5.	(Maintenance of clinic, medicine & medical			
	supplies + caretaker cost) ÷ Number of workers Helatcare (Kesehatan)			
4.	(Building maintenance + Food for children +	13,027		
	Creche Facilities (TPA)			
3.	Education [(Total cost not including teacher and non teacher labour cost + school transport + school building maintenance + food for children) ÷ number of workers] ÷ 12 months	68,129		

This DLW was compared with the 2020 standard minimum wage of Rp 3,284,500, the company has provided living expenses to employees amounting to Rp 3,337,229 per month or greater than Rp 52,729 per month from the monthly wage.

PROCEDURAL NOTE:

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

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

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



Once the DLW	benchmark i	s available,	this procedure	al note is no	longer applicable.

6.2.7 Permanent fulltime employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal

Based on verification of employee data documents for the December 2020 period, that: PT ISJ and PT RSK have permanent and non-permanent employees (day workers), until December 2020 the employee data are as follows:

Non Compliance

Tanjung Selamat Estate:

Status	Number of Workers	Percent
SKUH	179	32%
SKUB	26	6%
BHL	346	63%
Total	551	100%

Note: SKUH (Syarat Kerja Umum Harian) – Permanent workers 1, SKUB (Syarat Kerja Umum Bulanan) – Permanent Workers 2, BHL (Buruh harian Lepas) – Non permanent workers

Pangkatan Estate:

Status	Number of Workers	Percent
SKUH	156	28%
SKUB	24	5%
BHL	266	48%
Total	446	81%

Tanjung Selamat POM:

Status	Number of Workers	Percent
SKUH	46	52%
SKUB	35	40%
BHL	7	8%
Total	88	100%



		The company has identified the main work related to oil palm plantations based on the provisions of GAPKI No. 073/CAPK/r/2013, dated February 8, 2013, that in the decree it is stated that only 2 (two) jobs are the main activities in the oil palm plantation industry, namely harvesting and processing products, the rest are supporting activities in accordance with Permenakertans No. 19/2012 whose implementation can be left to other parties. Non conformity found during audit: Based on the employess master for the period December 2020, PT ISJ and PT RSK still have 113 temporary workers (Daily: PHL) who do the main work, namely: - There are 41 harvesters in the Pangkatan Estate with the level of daily workers (PHL)	
		 Tanjung Selamat Estate has 66 harvesters with the level of daily workers (PHL) Tanjung Selamat Mill has 2 processing workers, 2 Laboratory workers and 1 Biogas worker with the daily worker (PHL) level. 	
		Company has taken action to address the issue. Please see section 3 details of findings.	
	ation and collective bargaining are restricted under law, the employer	and join trade unions of their choice and to bargain collectively. Where the rifacilitates parallel means of independent and free association and bargaining	
6.3.1	(C) A published statement recognizing freedom of association and right to collective bargaining in national languages is available and is explained to all workers in languages that they understand, and is	Freedom of association policy, dated 26th November 2012, written in Bahasa Indonesia, this policy has been informed to all employees and being placed into public area easily accessed.	Complied
	demonstrably implemented.	PT Indo Sepadan Jaya (Tanjung Selamat and Pangkatan Estate) has established a Labor Union in accordance with the Decision Letter of PD FSPPP - SPSI of North Sumatra No. Kep-24/ORG/PC FSPPP-LBR/IX/2019, dated 3 Septemebr 2019 regarding "Pengukuhan Pengurus Unit Kerja	



Serikat Pekerja Pertanian dan Perkebunan – Serikat Pekerja Seluruh Indonesia (PUK SP.PP-SPSI) PT Indo Sepadan Jaya Kebun Tanjung Selamat Kec. Kampung Rakyat, Kabupaten Labuahabatu Selatan Masa Bakti 2019-2024", and has been registered with the Manpower Office of Labuahanbatu Regency. 26/DTK-VIII/ 2001 dated August 30, 2001 Chaired by Josmar Tamba and Saymsul Saragih as secretarist.

Labor Unions at Tanjung Selamat Mill, is based on "Perwakilan Cabang"-PC FSP.PP-SPSI Decree no. 59/ORG/PC FSP.PP-LBR/X/ 2015; regarding "Pengesahan Penetapan Penataan Kedua Komposisi Pengurus Unit Kerja Serikat Pekerja Pertanian dan Perkebunan PT Indo Sepadan Jaya PMKS Tanjung Selamat periode 2015-2017" is chaired by Mr. Faisal Ahmad Nasution.

Worker union in PT Rantau Sinar Karsa has formed according to "Surat Keputusan PC FSP.PP-SPSI Wilayah Kabupaten Labura No. Kep 88/ORG/PC FSPPP-LBR/IX/2017, dated 27 September 2017 regarding "Penetapan Penataan Komposisi dan Pengganti Antar Waktu Fungsionaris PUK SP.PP-SPSI PT Rantau Sinar Karsa Kec. Pangkatan, Kab. Labuhan Batu periode 2014-2019". Workr union has been registered in Dinas Tenaga Kerja Kabupaten Labuhan Batu No. 26/DTK-VIII/2001 since dated 30 August 2001. Worker Union always conducts communication and consulting with management, some meetings with management. Sample taken of record of meeting between company and labour union is conducted regularly, e.g.:

- 1. Meeting with the management on 11 January 2020, the meeting was discussed related to socialisation of company policy to all workers.
- 2. On 20 May 2020, the meeting was discussed related Uang Keramaian/tontonan (Manisan), this meeting was attended by 19 workers participants and 2 participants represent of company.
- 3. On 5 June 2020, meeting with the management to discussed related the FFB loading and unloading at Tanjung Selamat Mill.

During audit attendance list of meeting and minutes of meeting were

		available.	
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.	Labor Unions at Tanjung Selamat Mill, is based on "Perwakilan Cabang"-PC FSP.PP-SPSI Decree no. 59/ORG/PC FSP.PP-LBR/X/ 2015; regarding "Pengesahan Penetapan Penataan Kedua Komposisi Pengurus Unit Kerja Serikat Pekerja Pertanian dan Perkebunan PT Indo Sepadan Jaya PMKS Tanjung Selamat periode 2015-2017" is chaired by Mr. Faisal Ahmad Nasution.	Complied
		Worker union in PT Rantau Sinar Karsa has formed according to "Surat Keputusan PC FSP.PP-SPSI Wilayah Kabupaten Labura No. Kep 88/ORG/PC FSPPP-LBR/IX/2017, dated 27 September 2017 regarding "Penetapan Penataan Komposisi dan Pengganti Antar Waktu Fungsionaris PUK SP.PP-SPSI PT Rantau Sinar Karsa Kec. Pangkatan, Kab. Labuhan Batu periode 2014-2019". Workr union has been registered in Dinas Tenaga Kerja Kabupaten Labuhan Batu No. 26/DTK-VIII/2001 since dated 30 August 2001. Worker Union always conducts communication and consulting with management, some meetings with management. Sample taken of record of meeting between company and labour union is conducted regularly, e.g.:	
		 On January 31, 2019, a meeting to disscuse about premium increase and motorcycle assistance in accordance with PKB Article XV/2/b. Meeting with the management on 11 January 2020, the meeting was discussed related to socialisation of company policy to all workers. 	
		3. On December 7, 2018, the meeting discussed salary increases for the 2019 period and 2018 Christmas Day benefits.	
		4. On 20 May 2020, the meeting was discussed related Uang Keramaian/tontonan (Manisan), this meeting was attended by 19 workers participants and 2 participants represent of company.	
		5. On 5 June 2020, meeting with the management to discussed related the FFB loading and unloading at Tanjung Selamat Mill.	

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		During audit attendance list of meeting and minutes of meeting were available.	
6.3.3	Management does not interfere with the formation or operation of registered labour organizations/unions, or other freely elected representatives for all workers, including migrant and contract workers.	The union has 437 members, consisting of: Rank Plantation: 166 people, Tanjung Selamat plantation and factory: 271 people). Based on interviews with the head of the Tanjung Selamat Estate and Pangkatan Estate workers' unions, the management of PT ISJ and PT RSK did not intervene and influence the organizational structure in terms of establishing the organizational structure. Trade unions can freely recruit their members and as a sign of membership, the union also provides its membership card.	Complied
Criteria	6.4: 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.	A formal policy for the protection of children, including prohibition of child labour and remediation are available in "Kebijakan Perusahaan" signed by Managing Director on 1st December 2019. In the policy stated that Company are prohibited to employ the child in the company operation. Child employee are under age 18th years old according to UU No. 13 Tahun 2003. The policy are included in the service contract and supplier agreement, sample seen:	Complied
		Agreement contract with CPO/PK transporter Pengangkutan Sekawan Jaya "Perjanjian Pengangkutan Nomor: 02/X/SKJ-ISJ/2019" dated 1st October 2019; at Article 7 point e. "Tidak mempekerjakan anak dibawah umur yang dilarang oleh peraturan perundangan ketenagakerjaan yang berlaku"	
		Agreement contract with PT Buana Putra Jaya Lestari No. 01/SPJ/LEG-ISJ/III/19 dated 16 March 2019 – 30 March 2019, Scope of work: housing building. Annex 1 No. 7 " <i>Menjamin bahwa tenaga kerja pihak ke dua bukan pekerja anak yang dilarang oleh Undang-undang ketenagakerjaan</i> ".	
		Agreement Contract of FFB supplying on behalf of BUMDES Tebing Tinggi Sejahtera No. 008/TBS/ISJ/2020 dated 1 May 2020. The contract was described several company policies, including:	
		- The seller is willing to show the legality document of ownership	

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		- Prohibition of child labor, forced labor and human trafficking	
		- Call to uphold human values and prohibit retaliation against Human Rights Defenders (HRD) and prohibit harassment and intimidation	
		Heavy equipment rental agreement (Wheel Loader) on behalf of Nurkanim Saragih No. 168/E1PTS/09/20 dated 2 September 2020. It is explained in the contract regarding the prohibition of working children on:	
		- Point a; The Second Party is obligated to make payment of salaries/wages in accordance with the provisions of the minimum wage determined by the applicable Government.	
		- Point b; The second party guarantees that the second party does not employ minors that are prohibited by applicable labor laws and regulations	
		- Point c; obliged to maintain the functional preservation of the environment as well as to prevent and deal with environmental pollution and destruction in accordance with the provisions of Law no. 32 years 2009	
6.4.2	(C) Documented evidence on the fulfilment of worker's minimum age requirements in accordance with applicable regulation and verification procedures for age requirements, are available.	Based on document verification of list employe Tanjung Selamat POM, Tanjung Selamat Estate and Pangkatan Estate confirmed that there is no workers under age of 18 years old; the youngest workers birthday were 1996 and 1997 or 24/25 years old.	Complied
		Company also has procedure for employee recruitment as per SOP AA-HR-305.2 – RO Rekrutmen dan Seleksi Karyawan, dated 1 February 2009. stated in Section 7.0 Tahapan Seleksi – <i>usia minimum kandidat yang diterima adalah 18 tahun</i> , minimum age employee hiring accepted was 18 th years old.	
6.4.3	(C) Young person maybe employed only for non-hazardous work with protective restrictions in place for that work.	There is no young person under 18 years old employ in PT Indo Sepadan Jaya Tanjung Selamat POM, Tanjung Selamat Estate and Pangkatan Estate.	Complied
		Based on document verification of list employe Tanjung Selamat POM, Tanjung Selamat Estate and Pangkatan Estate confirmed that there is no	

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		workers under age of 18 years old; the youngest workers birthday were 1996 and 1997 or 24/25 years old.	
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.	A formal policy for the protection of children, including prohibition of child labour and remediation are available in "Kebijakan Perusahaan" signed by Managing Director on 1st December 2019. In the policy stated that Company are prohibited to employ the child in the company operation. Child employee are under age 18th years old according to UU No. 13 Tahun 2003. The policy are included in the service contract and supplier agreement, sample seen: Agreement contract with CPO/PK transporter Pengangkutan Sekawan Jaya "Perjanjian Pengangkutan Nomor: 02/X/SKJ-ISJ/2019" dated 1st October 2019; at Article 7 point e. "Tidak mempekerjakan anak dibawah umur yang dilarang oleh peraturan perundangan ketenagakerjaan yang berlaku"	Complied
		Agreement contract with PT Buana Putra Jaya Lestari No. 01/SPJ/LEG-ISJ/III/19 dated 16 March 2019 – 30 March 2019, Scope of work: housing building. Annex 1 No. 7 "Menjamin bahwa tenaga kerja pihak ke dua bukan pekerja anak yang dilarang oleh Undang-undang ketenagakerjaan".	
Criteria	6.5: There is no harassment or abuse in the workplace, and reproductive	e rights are protected.	
6.5.1	(C) A policy to prevent sexual and all other form of harassment and violence is documented, implemented and communicated to all levels of the workforce.	A policy to prevent sexual and all other form of harassment and violence are available in "Kebijakan Perusahaan" signed by Managing Director on 1 st December 2019. In the policy point 15 stated that "Mencegah pelecehan seksual dan berbagai bentuk kekerasan terhadap perempuan serta melindungi hak-hak reproduksinya". The policy has been communicated to all level workforce, sample seen: socialization to	Complied
6.5.2	(C) A policy to protect the reproductive rights of all, especially of women, is documented, implemented and communicated to all levels of the workforce.	A policy to protect the reproductive rights of all, especially of women are available in "Kebijakan Perusahaan" signed by Managing Director on 1 st December 2019. In the policy point 15 stated that "Mencegah pelecehan seksual dan berbagai bentuk kekerasan terhadap perempuan serta melindungi hak-hak reproduksinya". The policy has been communicated to	Complied

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		all level workforce, sample seen socialization on 21 January at pangkatan Estate attend by 34 workers. Socialization to workers also conducted through muster morning and banner/poster available in Afdeling Office.	
6.5.3	Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified in accordance with applicable regulations in Indonesia.	Management has conducted surveys and consultations with 30 female workers using the direct interview method in January 2020 to identify the needs of female workers who have children/babies under 5 years old and are still breastfeeding. From the results of the survey and consultation, management issued several policies, including:	Complied
		- Policy for employees who are breastfeeding, based on the Memorandum of the Plantation Manager No. 171/ES-KPT/MEMO/01/20 dated January 4, 2020, stated: the company guarantees female employees to breastfeed their children during working hours, by giving time and place to all female employees who have babies to breastfeed their children once for 45 minutes. : in the morning at 10.00-10.45 WIB at the clinic or afdeling office or 11.30 - 12.15 WIB.	
		- Periodic check-ups at the clinic to monitor the baby's health by providing POSYANDU services once a month at the Central TPA (Child Care Center) including the provision of immunizations and vitamins.	
		The company has provided menstrual leave for female employee in accordance with the recommendation from paramedic in clinic, and this is in line with "Perjanjian Kerja Bersama" and applicable regulations.	
		The company has granted the right for maternity leave the women who gave birth in accordance with the applicable rules and "Perjanjian Kerja Bersama".	
		The company has consistently performed pregnancy tests to women workers who worked as a fertilizer and spraying every 1 month.	

		The company has a policy of not hiring female labor during pregnancy or breast-feeding for the kind of work that endanger such as fertilizer or spraying by temporarily moving the work force to other types of work.	
6.5.4	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.	Terkait dengan pengaduan/complain, perusahaan telah membuat prosedur, yaitu Standard Operating Procedure, No. SOP: XX-HR-308.5-RO; Revision: 0, December 11th 2009: Employees complaints: submission and settlement. Mechanism for complaints management where it needs to protect its confidentiality for complaint submitter was found in company policy's draft as in one of points of this policies stated that:	Complied
		"To provide appropriate information for those who inqury it and to protect its confidentiality for whistle blower cases in accordance to law regarding environmental and social issue, food safety, health and safety work, so that it enables them to more participate to the decision making processes for improving company's performance".	
		Policies that have been made by companies related to the protection of women's rights such as;	
		a. The company has provided menstrual leave for female employee in accordance with the recommendation from paramedic in clinic, and this is in line with "Perjanjian Kerja Bersama" and applicable regulations.	
		b. The company has granted the right for maternity leave the women who gave birth in accordance with the applicable rules and "Perjanjian Kerja Bersama".	
		c. The company has consistently performed pregnancy tests to women workers who worked as a fertilizer and spraying every 1 month.	
		d. The company has a policy of not hiring female labor during pregnancy or breast-feeding for the kind of work that endanger such as fertilizer or spraying by temporarily moving the work force to other types of work.	



		e. The company has consistently performed regular health checks for sprayers every six months. The company has conducted training and socialization prevention of sexual harassment in the workplace to the Committee members for example gender socialization on 23 marh 2020, on "Sosialiasi Pelecehan Seksual dan Kebijakan Hak Reproduksi", was attended by 14 participants of Tanjung Selamat Estate, while at the Pangkatan Estate has socialization on 20 January 2021 and attended by 25 participants. On 2020 Period, Gender Committee Work Program has been established including the issues that will be discussed at the meeting, including: - Defending and guaranteeing the rights of women workers - Carry out routine immunization of children to mothers who have toddlers - Conduct family health education with environmental cleanliness Realization of Gender committee programe on 2021, such as: On February 23 March 2020; socialization to female workers related to the protection of women, children workers and sexual harassment at Tanjung Selamat Estate was attended by as many as 14 women workers. Socialization to female workers related to the sexual harassment policy on 21 January 2021 was attended by 25 participants. Based on the records of the routine meeting and interviews with management, that during the period 2019-2020 there were no cases related	
		to women workers.	
Criteria	6.6: No forms of forced or trafficked labour are used.		
6.6.1	 (C) All work is voluntary and the following are prohibited: Retention of identity documents or passports; Payment of recruitment fees; Contract substitution without worker's consent 	During audit and according to work contract, confirmed that all work is voluntary and there is no: Retention of identity documents or passports; Payment of recruitment fees;	Complied
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	Involuntary overtime;	Contract substitution without worker's consent	
	Lack of freedom of workers to resign	Involuntary overtime;	
	Penalty for termination of employment, unless the unit of	Lack of freedom of workers to resign	
	certification and the workers agree to the penalty and it is stated in the employment agreement Debt bondage	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	
	Withholding of wages	Debt bondage	
		Withholding of wages	
		No form of forced labor occur in PT Indo Sepadan Jaya. Company has a policy to comply with manpoer regulation UU No. 13 Tahun 2003. Company also has a policy to prevent and prohibit the forced labor as per "Kebijakan Perusahaan" signed by Managing Director on 1st December 2019. Stated in Company Policy point 17 "Tidak memberikan pekerjaan dibawah ancaman, sanksi atau hukuman dimana pekerja tidak memiliki kebebasan untuk menyepakati pelaksanaan pekerjaan".	
6.6.2	(C) Where temporary (Specified Time Work Agreement/PKWT) or migrant workers are employed, a specific labour policy and procedures are established and evidence of implementation is available.	There is no migrant workers in PT Indo Sepadan Jaya — Tanjung Selamat POM, Tanjung Selamat Estate and Pangkatan Estate. There is no PKWT workers in PT Indo Sepadan Jaya	Complied
		For permanent workers, term and condition Company has agreement in PKB which contain term and condition for workers.	
		For casual workers contract available in "Perjanjian Kerja Harian Lepas".	
		Labour policy are provided in "Kebijakan Perusahaan" and procedure to manage the workers are available in SOP AA-HR-305.2 – RO Rekrutmen dan Seleksi Karyawan, dated 1 February 2009.	
		PT Indo Sepadan Jaya – Tanjung Selamat POM and Estate and PT Rantau Sinar Karsa – Pangkatan Estate has issued the specific labour policy and procedures for temporary workers (PHL/PKWT); The policy and procedure are issued for each unit as below:	



		- Tanjung Selamat POM: Memorandum No. 009/Mill-PTS/INT/07/2020 dated 24 July 2020.	
		- Tanjung Selamat Estate: Memorandum No. 171/ES- KTS/MEMO/07/2020 dated 23 July 2020.	
		- Pangkatan Estate: Memorandum No. 266/ MEMO/INT/07/2020 dated 01 July 2020.	
		The policy and procedure has been communicated to temporary workers at Tanjung Selamat POM on 25 July 2020, in Tanjung Selamat Estate on 3 August 2020 and in Pangkatan Estate on 4 July 2020.	
		The procedure was explain the detail of mechanism for temporary workers recruitment, promotion of temporary workers to be permanent workers, term and condition and requirement of temporary workers in accordance with National regulation (UU No. 13 tahun 2003).	
Criteria (5.7: The unit of certification ensures that the working environment unde	r its control is safe and without undue risk to health.	
6.7.1	(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed	PT Indo Sepadan Jaya Tanjung Selamat POM and Estate has appointed the responsible person) for H&S is identified as per P2K3 (Safety Committee Meeting). P2K3 has an approval from Manpower and Transmigration Office.	omplied
	at these meetings, and any issues raised are recorded.	Tanjung Selamat POM	
		P2K3 Tanjung Selamat POM has been formed and has an endorsement/approval from Manpower Office Sumatera Utara Province according to "Surat Keputusan Kepala UPT Pengawasan Ketenagakerjaan Wilayah IV Dinas Tenaga Kerja Provinsi Sumatera Utara Nomor: KEP.88-7/P2K3/WIL-IV/DTK/SU/2021 tentang Pengesahan Panitia Pembina Keselamatan dan Kesehatan Kerja (P2K3) di Perusahaan" dated 8 February 2021. Safety Officer or "Ahli K3 Umum" OSH expert was assigned as P2K3 secretary. Safety Officer on behalf Muhamad Ulil Amri has a license from Ministry of Manpower with licence Number No. Reg.88641/PK3/AJ/12/2020/P0 dated 21 October 2020, valid until 21 October 2023.	

		Tanjung Selamat Estate	
		P2K3 Tanjung Selamat Estate has been formed and has an endorsement/approval from Manpower Office Sumatera Utara Province according to "Surat keputusan Kepala Dinas Tenaga Kerja Kabupaten Labuhan Batu Nomor: KEP.190-7/P2K3/WIL-IV/DTK/SU/2020 tentang Pengesahan Panitia Pembina Keselamatan dan Kesehatan Kerjadi Perusahaan" dated 2 June 2020. Safety Officer or "Ahli K3 Umum" OSH expert was assigned as P2K3 secretary. Safety Officer on behalf Christofel Tobing has a license from Ministry of Manpower with licence number No. Reg. 30194/PK3/AJ/12/2019/P1 dated 23 September 2019 valid until 23 September 2022.	
		Pangkatan Estate	
		P2K3 Pangkatan Estate has been formed and has an endorsement/approval from Manpower Office Sumatera Utara Province according to Surat keputusan Kepala UPT Pengawasan Ketenagakerjaan Wilayah IV Dinas Tenaga KErja Provinsi Sumatera Utara Nomor: KEP.11-7/P2K3/WIL-IV/DTK/SU/2020 tentang Pengesahan Panitia Pembina Keselamatan dan Kesehatan Kerja" dated 14 Januari 2020. Safety Officer or "Ahli K3 Umum" OSH expert was assigned as P2K3 secretary. Safety Officer on behalf Suriyanto Vinargo has a license from Ministry of Manpower with licence Number No. Reg.79242/PK3/AJ/12/2019/P0 dated 4 December 2019 and valid until 4 December 2022.	
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.	There were established several documented procedures related to accident and emergency procedure in local language Bahasa Indonesia. Accident and emergency procedures no. AA-EMS-446-PR (operation control), AA-EMS-447-PR (Emergency preparedness), AA-EMS-001-FM (Emergency plan), AA-EMS-003-FM (Emergency incident), and AA-EMS-004-FM (Emergency incident Reporting).	Complied
		According to the emergency procedure, the emergency conditions have been identified including Fire and explosion at buildings; land fire;	



earthquake; flooding; chemical spill and poisonings also waste water ponds spillage. The procedures described the roles and responsibilities of each emergency response team include the mechanism how to conduct medical evacuation to near hospital/local health centre, the emergency contact number of each internal emergency team and external related parties such as public fire station at local area Kabupaten Labuhan Batu and Public health centre were also available.

Company has formed the emergency response team as per "Struktur Organisasi Tanggap Darurat". During audit can be demonstrated emergency response team for Tanjung Selamat POM, Tanjung Selamat Estate and Pangkatan Estate. Emergency response team has conducted the regular training to response the emergency situation, sample seen: Basic Fire training on 5 February 2021.

Emergency drill has been conducted each year, latest emergency drill for land fire conducted on on 5 February 2021 in Tanjung Selamat Estate, 27 March 2020 in Tanjung Selamat POM and on 4 July 2020 in Pangkatan Estate. Evidence of emergency drill can be demonstrated during audit including Scenario and minutes of emergency drill as per "Pengujian Kesiagaan Tanggap Darurat".

PT Indo Sepadan Jaya and PT Rantau Sinar Karsa has appointed the licenced First Aider which is Foreman in each department/Afdeling. First aid training has been carried out by company, sample seen: First aid training for field foreman in Pangkatan Estate on 10 January 2020 attended by 26 field foreman;

First aid training for Field Foreman in Tanjung Selamat POM, Tanjung Selamat Estate, and Pangkatan Estate has been delivered by company doctor and paramedic. Latest training on 6 January 2020 at Tanjung Selamat Estate with 16 participants, Tanjung Selamat POM on and Pangkatan Estate on



First aid equipment are available in the worksite both in Tanjung Selamat POM, Tanjung Selamat Estate and Pangkatan Estate. Sample seen:

- At Tanjung Selamat POM, there are 12 first aid equipment available at Secuity Pos, Office, Laboratory, Warehouse, Workshop, Mill operation office, Clarification station, Engine Room station, Boiler station, Water Treatment plant, Press Station, Sterilizer station, Hazardous waste storage.
- At Tanjung Selamat Estate, first id equipment are available in the office, childcare, workshop, warehouse and each field foreman Afdeling I – IV with total first aid equipment 30 unit.
- At Pangkatan Estate, there are 40 first aid equipment are available in office, childcare, workshop, warehouse and each field foreman.

Record of accident are available in "Laporan kecelakaan Kerja" Tanjung Selamat POM, Tanjung Selamat Estate and Pangkatan Estate. Report of accident period January – December 2020 are available. Each accident case were followed up by investigation as record in "Rekaman Kecelakaan Kerja" woch explain the detail of accident case, rootcause analysis and follow up action.

Accident report are review in regular basis each month through P2K3 meeting. Record of P2K3 meeting can be demonstrated during audit, sample seen:

- P2K3 meeting Tanjung Selamat POM on 30 May 2020,
- P2K3 meeting Tanjung Selamat Estate on 15 November 2020, 22
 December 2020 and 27 January 2021 discussing ministrike usage for fire prevention, PPE usage review by workers, first aid awareness, review PPE and safety equipment for each foreman, review accident report.
- P2K3 meeting Pangkatan Estate on 17 November, 18 December 2020 and 20 January 2021 discussing PPE usage review by workers, first aid

		awareness and monitoring, Covid-19 protocol during Christmas, review accident report.	
6.7.3	(C) Workers use appropriate personal protective equipment (PPE) which is provided free of charge to all workers in the workplace, to cover all potentially hazardous operations, such as pesticides application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.	PT Inti Indosawit Subur – Buatan I POM has demonstrated the record of realization the OHS program 2020 including 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. Tanjung Selamat Estate and Pangkatan Estate has provide sanitation facilities for spraying operator, so that workers can change out of PPE, wash and put on their personal clothing. Sanitation facilities provide in area of	Complied
		Agrochemical warehouse with separate place. Based on field visit to Tanjung Selamat Estate and Pangkatan Estate can be demonstrated that sanitation facilities are well function and sufficient for spraying workers.	
6.7.4	All workers are provided medical care and covered by accident insurance. Costs incurred from work related incidents, leading to injury or illness, are covered in accordance with applicable regulations or by the unit of certification if applicable regulations do not provide protection.	All workers have been provided with medical care and accident insurance (BPJS Ketenagakerjaan & BPJS Kesehatan). The insurances were still valid as seen by the recent slip payment in January – December 2020 for estate and mill. Several insurance payments are reviewed and are in accordance with the number of workers. For example, auditor has verified the BPJS Ketenagakerjaan (Accident and pension insurance) and Kesehatan receipt of payments period of January 2021 for total of 87 workers from Tanjung Selamat POM, 544 workers from Tanjung Selamat Estate and 471 workers from Pangkatan Estate. Based on interview with sampled worker during the field visit in estate and mill, the affected workers received appropriate medical treatment from the insurance policy.	Complied

6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	PT Indo Sepadan Jaya EHS team prepares safety index. The safety index is monitoring tool, indicating number of worker (at each operating units), number of major and minor accident as well as the lost time injury.	Complied
		The monitoring carried out on monthly basis and results were discussed during safety committee meeting. The incident statistics include man-hours, lost time accident and Frequency rate (FR) and Severity rate (SR) were reported quarterly as P2K3 report by safety officer to Manpower office, sample seen: P2K3 report period October – December 2020 Tanjung Selamat Estate reported on 11 February 2021.	
		In Tanjung Selamat PO< Tanjung Selamat Estate and Pangkatan Estate there is a record of accident report and incident statistics include manhours, lost time accident and Frequency rate (FR) and Severity rate (SR) were made by safety officer:	
		- Tanjung Selamat Estate: During 2020 there were 3 accident occur with category medical aid with lost time injury 62 mandays or 434 manhours, frequency rate 2,25 and saverity rate 46.58 (days) or 326.07 (hour).	
		- Pangkatan Estate During 2020 there were 4 accident occur with category medical aid with lost time injury 14 mandays or 98 manhours, frequency rate 3,5 and saverity rate 12 (days) or 86.04 (hour).	
		- Tanjung Selamat POM: During 2020 there were 12 accident occur with category first aid, there is no lost time injury.	
Princip	le 7: Protect the environment, conserve biodiversity and en	nsure sustainable management of natural resources.	
Criteria	a 7.1: Pests, diseases, weeds and invasive introduced species are ef	ffectively managed using appropriate Integrated Pest Management (IPM	l) techniques.
7.1.1	(C) IPM plans are implemented and monitored to ensure effective pest control.	Integrated Pest Management (IPM) was implemented and documented in related records, e.g. "Monitoring Pengendalian Hama UPDKS Mei 2020", "Rekap Serangan Hama dan Penyakit", Pest Census Summary form B2 (Ulat Api & Ulat Kantong), "Data Titik Sensus Ulat Api", "Ringkasan Sensus Hama	Complied



Tikus", "Sensus Kandang Burung Hantu", "Formulir A4 Sensus Burung Hantu".

Summary of IPM in Tanjung Selamat Estate period November 2020; attack of *Setora nitens* above APK is 38 Ha, average 15 caterpillar/frond; below APK is 81 Ha, average 3 caterpillar/frond. Control being done using fogger. Attack of bagworm *Pteroma pendula* above APK is 91 Ha, average 25 caterpillar/frond; attack below APK is 473 Ha, average 9 caterpillar/frond; control being done by cutting infested leaf with 30 days interval. No new infested Oryctes found; controlled using *Lamda sihalotrin* 1% in monthly intervals. No new infested Molusca found; controlled using *Sibutox* 10 gr/palm in monthly intervals. Termite infestation found based on "Deteksi dan Pengendalian Hama Rayap" period December 2020, there was 2,289 palms controlled, consist of 49 palms in Div. 1; 623 palms in Div. 2; 504 palms in Div. 3 and 1,113 palms in Div. 4. Control has been done on infested palms and isolation using *Fipronil* at dosage 1,5 cc/liter water.

Detection and census of Ganoderma, conducted by 4 rounds in a year. Control done by felling manually, chopping and making hole $1,5 \text{ m} \times 1,5 \text{ m} \times 1$ m. Based on Ganoderma census period December 2020, there was 498 palms felled, consist of 1 palm in Div. 1; 83 palms in Div. 2; 233 palms in Div. 3 and 181 palms in Div. 4.

Program and Progress of Host Plant upkeep; interpolation done to replace dead palms. Watering program for newly planted host plants until they are 1 month old. Weeding / spraying is carried out with a target of once every 2 months. Compound fertilization 15:15:6:4 at a dose of 5 gr/palms at the age of 3 and 6 months after planting.

Available R&D Visit Report (R&D-P&D-KTS-October-03-2020) based on visit 1-3 October 2020. Described attack of leaf eater caterpillar ±257 Ha, its biological control using *Paecilomyces* sp. and *Beauveria* sp. fungi; attack of rat, barn-owl box, *Tirathaba* sp., *Ganoderma* spp and Hatch & Carry mobile for spreading of *Elaeidibius camerunicus*.

		Available R&D Visit Report (R&D-P&D-KPT-September-03-2020) based on visit 24-26 September 2020. Described that <i>Oryctes rhinoceros</i> is still found infestation at Mature area that bordering with Immature area at intensity 1-2 palms/line. Tanjung Selamat and Pangkatan Estate has implemented biological control	
		to minimize or eliminate pest and disease, e.g. by use of barn owl and planting beneficial plants such as <i>Casia sp.</i> , <i>Antigonon leptopus</i> and <i>Turnera subulatta</i> .	
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.	Inventory and identification of invasive species in the Tanjung Selamat and Pangkatan Estate has been done according to the List listed in the regulation "Minister of Environment and Forestry Regulation No. P.94/MENLHK/SEKJEN/KUM.1/12/2016".	Non Compliance
		The unit of certification has a list of existing invasive species and evaluate the status of control in certified area on 27 November 2020 in Tanjung Selamat Estate, on 4 November 2020 in Pangkatan Estate. Some species are naturally exist in the area and the spreading are controlled manually, e.g. <i>Clidemia hirta, Imperata cylindica and Mikania micranta</i> . The are no species in the list that used to manage areas in unit of certification.	
		Activity of inventory and identification of Invasive Species has been included into the Conservation Management Plan to be periodically carried out. Non conformity during audit:	
		Indonesia regulation has listed the invasive species and its management according to "Peraturan Menteri KLHK No. P. 94/MENLHK/SEKJEN/KUM.1/12/2016".	
		However Tanjung Selamat Estate and Pangkatan Estate has not evaluated the invasive species which may exist in the plantation.	
		Company has taken action by made correction and corrective action to address the isse. Please see section 3 details of findings.	

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 Tanjung Selamat and Pangkatan Estate.
Criteria	7.2: Pesticides are used in ways that do not endanger health of workers	families, communities or the environment.
7.2.1	(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.	Justification of pesticide used is explained under company procedure of weed control - "SOP Pengendalian Gulma No.AA-APM-OP-11100.08- R1" dated 1 November 2008. Chapter IV explains the weed control program for woody, grass, fern, caladium, wild banana (<i>Musa</i> spp), <i>Asystasia</i> , etc. It does explain active ingredients use to control such weed, dosage per application, type of nozzle used and volume of spraying per application. Chapter V explains selection of pesticide and its active ingredients content, nature of the pesticide and target species. Chapter VII describes calculation of actual area implemented per hectare plantation (spray factor), spraying rotation and spraying output.
		Spraying works were conducted by selected spraying on specific target, for example weeds spraying on circle, path and TPH (market place). Other areas beside specific area were not applied. Riparian area along the river are prohibits to be performed spraying to minimize and reduce the negative environmental impact to the river and ecosystem. Pesticide and herbicide used by company was registered in the book of pesticides - "Komisi Pestisida" and has permit from government.
7.2.2	(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per Ha and number of applications) are provided.	The company has recorded list of herbicides used, completed with active ingredient, LD50, WHO class, trademark, target, registration number and expiry date. Type, volume used and volume per Ha of pesticide in Tanjung Selamat Estate in 2020:
		Trade Mark Active Ingredients Register No. E.D. Volume A.I./Ha
		Lindomin 865AS 2,4 Dimetil Amina 865 g/l RI.01030119898 for 20 10/12/20 for 20 58 l 1,6 for 20

		Kenlon 480 EC	Triklopir Butoksi E Ester	til RI.01030120062 433	31/12/20 21	224.90 l	3,5	
		Elang 480 SL	Isoprofilamina Glifos 480 g/L		21/12/20	421 l	6,5	
		Kenrane	Floroksipir 1-MHE : 28	38 RI.01010120103	10/12/20	118,7 l	3,8	
		288EC Regent 50SC	g/l Fipronil 50 g/l	759 RI.01010119951 192	20 31/12/20 20	103,2 l	0,2	
		Type, volur 2020:	me used and volu	-		angkatar	n Estate in	
		Trade Mark	Active Ingredients	Register No.	E.D.	Volume	A.I./Ha	
		Elang 480 SL	Isoprofilamina Glifosat 480 g/L	RI.01030119941170	21/12/2021	1.900,4	0,25	
		Meta Prima 20 WP	Methyl Metsulfuron	RI.01030120031897	03/12/2023	549 kg	3,003	
		Solusi 865 SL	2.4 D Dimetil Amina 865 g/l	RI.01030120031931	06/10/2022	22.7	0,005	
		Supremo 480 SL	Isopropil Amina Glifosat 480 g/l	RI. 01030120021712	02/05/2022	4.722	0,62	
		Polydor 25 EC	Lamda cyhalotrine 25 g/l	RI.01010120041994	12/11/2023	4.243 I	29,02	
		Regent 50 SC	Fipronil 50 g/l	RI. 01010119951192	31/12/2020	410,74	0,0056	
7.2.3	(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.	IPM Plans, and planne pest, which controlling pesticide us	icide are minimize there are no pesti d intervals. Pestice has exceeded the pest, the unit of sage and give price ted pest manage	cide application of the color of the color of the color of the color of certification of the prevention to the prevention of the color	outside of to reduce eshold. It a committed	he targeto / elimina also evide to alway	ed species te existing ent that in ys reduce	Complied
7.2.4	There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in Indonesia best practice guidelines.	use fipronil	ny use fipronil as pare described in 8.5 Cc	SOP of Pest and	Disease Co	ontrol (AA	A-APM-OP-	Complied



		insecticide. It described that for prophylactic, 6 palm around infested palm is applied 3 litre insecticide on ground with 30 cm radius.	
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 are no pesticides that categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat used by the unit of certification.	Complied
	7.2.5b Why there is no other alternative which can be used.	Please see above	
	7.2.5c Which process was applied to verify why there is no other less hazardous alternative.	Please see above	
	7.2.5d Process to limit the negative impacts of the application.	Please see above	
	7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.	Please see above	
7.2.6	(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they conduct.	Pesticides are only applied and handled by trained spraying workers who have received appropriate training. Training for pesticides applicator uses was delivered on 19 April 2019 by PT Syngenta Indonesia. Training certificate were evident. Due to Covid-19 pandemic, there are no specific training for pesticides in 2020, however refreshment training for SOP and WI regarding spraying work was conducted regularly in morning briefing. Training covered handling of agrochemical concentrate and spraying method including pesticide hazard and use of PPE.	Complied
7.2.7	(C) Storage of all pesticides in accordance with recognized best practices.	Pesticides were stored in the determined area separated from fertilizer and other chemicals. Pesticides storage provided in central workshop and it was locked areas with limited access, both Tanjung Selamat Estate and	Complied

		Pangkatan Estate. The storage ventilated through cross flow ventilation. MSDS and hazard symbol label were provided nearby of pesticides. Emergency shower and eyewash were also provided to anticipate in case of an emergency of chemical handling. PPE for handling of chemicals were provided including boots, apron, safety glass, respiratory mask and hand gloves.	
7.2.8	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.	Ex pesticides container are properly disposed designated area. Handover of ex pesticides container is available in "Lembar Neraca Limbah Bahan Berbahaya Dan Beracun".	Complied
7.2.9	(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.	There is no aerial spraying of pesticide implemented in Tanjung Selamat Estate and Pangkatan Estate.	N/A
7.2.10	(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.	Specific medical surveillance conducted twice a year by company. - Latest MCU in Pangkatan Estate conducted on 11 December 2020 by company doctor and paramedic for 148 workers (spraying workers, manuring workers, warehouse, pest and disease workers. - Latest MCU in Tanjung Selamat Estate conducted on 15 December 2020 by company doctor and paramedic for 110 workers (spraying workers, manuring workers, warehouse, pest and disease workers. MCU covering: urine test, respiratory rate, heart rate, blood test (haemoglobin, leuokosi). According to test result confirmed that all the workers are normal, some of workers indicated high haemoglobin and leukosit. The recommendation for follow up has been raised and implemented.	Complied



7.2.11	(C) No pesticide-related work is carried out by pregnant or breastfeeding women, or people with medical limitations and they are offered other equivalent work alternatives.	Company has implemented the protection of women reproductive rights, in form of maternal leave, period leave, and regular pregnancy check for female sprayers and strictly prohibit pregnant and/or breastfeeding female worker applying pesticides.	Complied
		Interview with female spraying workers in Block C19A Afdeling III Pangkatan Estate and Tanjung Selamat Estate Afdeling I, confirmed that there is no pregnant workers are handling pesticide/herbicide.	
		Pregnancy test for female spraying workers conducted each month, latest test conducted on 9 February 2021 by testpack urine. According to the test result there was 163 workers female (manuring workers, pest and disease workers and spraying workers).	
		Company has a policy to prohibit pegnant or breastfeeding women to conduct the working related to agrochemical (pesticide and fertilizer).	
Note For	7.2.11		
mills on t		ning Child Protection, and taking into account the risks of hazards on palm oil pational interpretation mandates that the unit of certifications does not employers under 18 years in indicator 7.2.11 are irrelevant.	
Criteria	7.3: Waste is reduced, recycled, reused and disposed of in an environment	entally 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.	PT Indo Sepadan Jaya has shown the document of waste management plan under "Evaluasi Aspek Dampak Lingkungan" nomor: EMS-431-003-LT last review on January 2020. The identification of waste and pollution sources including used lubricant and filter, old battery, used laboratory chemical, clinical/medical waste, mill effluent, EFB, smoke, dust, fiber and shell,	Non Compliance

water and domestic household refuse.

empty agrochemical container, boiler ash, scrap iron, used tires, waste

Hazardous and medical waste is disposed to the register collectors while domestic waste disposed to the landfill, organic and an organic waste is

		separate in line site, organic waste to the landfill and some of inorganic waste is collected for re-cycle. PT Indo Sepadan Jaya has also established the procedure to manage the waste generated from all activity, such as: - Procedure AA-KL-05-EFP, procedure of non-hazardous waste handling covering: mill water (used rail, used part, ex chemical non-	
		hazardous/toxic, EFB, fiber, shell), estate waste (used polybag, ex fertilizer sack), office waste (used paper, used work equipment), Workshop waste (used hose, used drum, scraped/used parts, used tire), power generator waste (used hose, used parts, scarped), Logistic waste (ex-fertilizer sack, used drum).	
		 Procedure AA-KL-11-EFP, procedure of laboratory waste handling. Procedure to utilize the fiber and shell (solid waste) as a boiler fuel SOP No. AA-MPM-OP-1400.04-R1 "Pemanfaatan fiber untuk bahan bakar". 	
		EFB (Empty Fruit Bunch) utilization as a mulching or organic fertilizer according to SOP Pemupukan AA-APM-OP-1100.09-R1.	
		PT Indo Sepadan Jaya has a licence for hazardous waste storage based on "Keputusan Kepala Dinas Penanaman Modal dan Pelayanan Terpadu Satu Pintu Kabupaten labuhan Batu Nomor: 503.660.3/556/DPMPTSP-BP2MNP/2019 Tentang Pemberian Izin Pengelolaan Limbah B3 Untuk Kegiatan Penyimpanan Limbah B3 kepada PT ISJ" valid for 5 years.	
7.3.2	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.	PT Inti Indosawit Subur has a waste management plan, identifying type and source of waste and the disposal plan. PT Inti Indosawit Subur prepared a procedure to handle hazardous waste titled "Prosedur Penanganan Limbah B3" No.AA-KL-06-EFP explains methods to collecting the waste, recording in balance and disposal through licensed third party transporter.	Complied

		I	1
		The company store hazardous waste in temporary storage with permit, The hazardous waste is sent to the registered collector/transporter which approved by Environmental Ministry, namely PT Indostar Cargo.	
		Based on interview with workers who are handling of pesticides that they understood of disposed empty containers pesticides, such as: Empty chemical containers re-used only for mixing purposes, unusable are triple rinsed, punctured and disposed to the approval collector.	
7.3.3	The unit of certification does not use open fire for waste disposal.	All waste products has been identified and documented under the "Evaluasi Aspek- Dampak Lingkungan" (Environmental Aspect impacts). Domestic waste is the main concern to be manage. Both Mill and Estate, has periodically schedule to manage the domestic waste. Regulation of domestic waste management refer to "UU No. 18 Tahun 2008 tentang Pengelolaan Sampah". PT Indo Sepadan Jaya and PT Rantau Sinar karsa has provide landfill for domestic waste. During field visit to landfill area at Tanjung Selamat Estate and Pangkatan Estate shown that landfill area has well managed and domestic waste handling in accordance with procedure and regulation.	Complied
Criteria 7	7.4: Practices maintain soil fertility at, or where possible improve soil fer	tility 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.	The unit of certification has established procedure soil fertility in "SOP AA-APM-OP-1100.09. R1" - SOP Pemupukan, consist of type and recommendation of fertilizer for immature and mature areas, cycle, dosage and when fertilizer is applied. The company has applied management strategy to maintain soil fertility according to the procedure. Manuring was performed manually with spreading the fertilizer by person uniformly in each palm oil trees in accordance with dosage which has defined by Research and Development recommendation.	Complied
		Fertilizers were applied to maintain and increase soil fertility, fertilizer applied in accordance to the fertilizer recommendation which created based on soil and leaf analyis. Records of fertilizer application in Tanjung Selamat	

		and Pangkatan Estate 2020 as well as recommendation are available in "Fertilizer Application and Recommendation 2020".	
7.4.2	Analysis of tissue samples (e.g. leaves) and soil on a regular basis to monitor and manage changes in soil fertility and plant health is documented.	Analysis of tissue samples were implemented. Records of periodical leaf sampling and visual analysis were available. Foliar Analysis Report shows that leaf sampling and analysis has been done recently in April 2020. The result has been used to develop fertilizer recommendation of 2021.	Complied
		For Tanjung Selamat Estate, it was shown "Foliar Analysis Report" PT Indo Sepadan Jaya – Tanjung Selamat Estate – Division 3; No. Order 35/LSU-AGR/04/20; Data received on 02/04/2020; sample size 30 sample; issued date 25/04/2020; No. Ref. 054/INT/R&D/APR/L/20. Analysis result for No. Lab. 20L03521; Block C12a is 5.01% ash; 2.79% N; 0.169% P; 1.05% K; 0.32% Mg; 0.49% Ca; 29 ppm B; 4 ppm Cu; 16 ppm Zn; 223 ppm Mn; 106 ppm Fe dan 0,56% Cl.	
		For Pangkatan Estate, it was shown "Foliar Analysis Report" PT Rantau Sinar Karsa – Pangkatan Estate– Division II; No. Order 61/LSU-AGR/04/20; Data received on 17/04/2020; sample amount 12 sample; issued date 15/05/2020; No. Ref. 080/INT/R&D/MEI/L/20. Analysis result No. Lab. 20L05152; Block B18a is 7.67% Ash; 2.78% N; 0.158% P; 1.03% K; 0.43% Mg; 0.58% Ca; 40 ppm B; 6 ppm Cu; 10 ppm Zn; 407 ppm Mn; and 83 ppm Fe.	
		Evidence of soil analysis was shown on record "Data Analisis Tanah Profil 6" of Block J93c Afdeling IV Pangkatan Estate dated 25/04/2013, by Gunawan Kristiyanto, with result; main material: Alluvium Riverine, humidity regime: Udik, Temperature regime: Isohipertermik, drainage class: Good, Epipedon: Okrik, Horizon: Argilik, Classification: Typic Endoaquults. Analysis result: Lab no. 13S1174, depth: 0 – 20, Coarse: 0,	
		Fine sand: 1, Silt: 42, Clay: 57, Texture: SiCl, pH H ₂ O: 3.9, pH KCl: 3.6, pH level: sm, N: 0.16%, C Org: 2.06%, Org C level: S, P total: 183.57 ppm, Av Brayll: 1.39 ppm, P total level: T, P Av level: SR, CEC pH7: 4.77 meg/100g	



	soil, CEC level: SR, K: 0.22 meq/100g soil, K level: R, Ca: 1.21 meq/100g soil, Ca level: SR, Mg: 1.18 meq/100g soil, Mg level: S.	
7.4.3	Nutrient recycling strategy performed by application of bunch ash. In 2020 it was applied 615,703 kg of bunch ash from budget 845,922 kg in Tanjung Selamat Estate. There is no application EFB and POME in Tanjung Selamat and Pangkatan Estate since the plantation area is peat.	Complied



7.4.4	Records of fertilizer inputs are maintained.	covers all of upkeep	All fertilizer input recorded in "Laporan Unit Kebun (LUK)", a monthly report covers all of upkeep activities. Below are record of recommendation and realization of fertilizer in Tanjung Selamat Estate for period January – December 2020:			
		Type of Fortilizer	Tanjung Selama	Tanjung Selamat Estate		
		Type of Fertilizer	Recommendation (kg)	Actual (kg)		
		Hi-Kay	197,998	189,046		
		AC	1,461,960	1,448,897		
		RP	482,857	455,413		
		MOP	2,231,806	2,356,693		
		Dolomite	660,929	660,177		
		HGFB	100,547	99,837		
		CuSO ₄	10,352	15,294		
		ZnSO ₄	10,352	10,228		
		Mix CuZn	44,269	43,626		
		Bunch Ash	845,922	615,703		
			of recommendation and re period January – December	2020:		
		Type of Fertilizer	Pangkatan Estate Recommendation (kg)			
		Hi-Kay	514,783	469,551		
		MOP	113,186	81,253		
		Dolomite	56,898	55,807		
		HGFB	18,229	18,179		
		CuSO ₄	22,637	14,922		
		ZnSO ₄	17,764	9,350		
		TSP	-	410,533		
Criteria	7.5: Practices minimise and control erosion and degradation of soils.					
7.5.1	(C) Maps that identify marginal and fragile soils, including steep sloped land are available.	Tanjung Selamat Est	ate:		Complied	



Map of peat soil is available in place with scale 1: 20.000, including:

- 1. Peta Kerja Kebun Tanjung Selamat, contained block number, Afdeling, hectares, road, river and housing complex.
- 2. Peta Citra Landsat year 2002.
- 3. Elevation Map; contain 0 8% (3.855 ha)
- 4. Topography Map; contain 2.5 12.5 m above sea level
- 5. Soil and Suitability Map;
 - a. Peat < 1 meter: 1.602 ha
 - b. Peat 1 3 meter: 2.101 ha
 - c. Peat > 3 meter: 152 ha

Total: 3,855 ha

6. Soil Serial Map

Pangkatan Estate:

- Peta Citra Landsat 7 ETM, path 128, raw: 058, PT Rantau Sinar Karsa Kebun Pangkatan, year 2002, scale 1:20.000
- Soil Serial Map, covers 3,855 ha, scale 1:20.000
 - a. Typic Endoaquults Pangkatan Series.
 - b. Sapric Haplohemists Pangkatan Series.
 - c. Typic Haplohemist Pangkatan Series.
- Soil Suitability Map, scale 1:20.000;
 - o Typic Endoaquults Slope: 0-3% (856 ha)
 - o Typic Haplohemist, Peat < 1 m; Slope 0-3% (746 ha)
 - o Sapric Haplohemist, Peat 1 3 m; Slope: 0-3% (2,101 ha)
 - Sapric Haplohemist, Peat > 3m; Slope 0-3% (152 ha)
 - Marginal Suitable Area (S3): ± 746 ha (19,4%)

		 Unsuitable Area with Condition (N1): ± 3,109 ha (80,6%) 	
		Elevation Map, scale 1:20.000; Flat (0 - 8%): 3,855 ha.	
7.5.2	The replanting of palm oil is not conducted extensively on steep terrain in accordance with applicable regulations.	Based on elevation map, there is no steep terrain in Tanjung Selamat and Pangkatan Estate, therefore there is no replanting in steep terrain. It was also confirmed during field visit to Tanjung Selamat Estate and pangkatan Estate.	Complied
7.5.3	New palm oil planting is not conducted on steep terrain in accordance with applicable regulations.	Based on elevation map, there is no steep terrain in Tanjung Selamat and Pangkatan Estate, therefore there is no replanting in steep terrain. It was also confirmed during field visit to Tanjung Selamat Estate and pangkatan Estate.	Complied
Criteria operation		ng in the establishment of new plantings, and the results are incorporated	into plans and
7.6.1		Tanjung Selamat Estate:	Complied
		Map of peat soil is available in place with scale 1: 20.000, including:	
		- Peta Kerja Kebun Tanjung Selamat, contained block number, Afdeling, hectares, road, river and housing complex.	
		- Peta Citra Landsat year 2002.	
		- Elevation Map; contain 0 – 8% (3.855 ha)	
		- Topography Map; contain 2.5 – 12.5 m above sea level	
		- Soil and Suitability Map;	
		a. Peat < 1 meter: 1.602 ha	
		b. Peat 1 – 3 meter: 2.101 ha	
		c. Peat > 3 meter: 152 ha	
		Total: 3,855 ha	
		- Soil Serial Map	
		Pangkatan Estate:	



- Peta Citra Landsat 7 ETM, path 128, raw: 058, PT Rantau Sinar Karsa Kebun Pangkatan, year 2002, scale 1:20.000
- Soil Serial Map, covers 3,855 ha, scale 1:20.000
 - o Typic Endoaquults Pangkatan Series.
 - o Sapric Haplohemists Pangkatan Series.
 - o Typic Haplohemist Pangkatan Series.
- Soil Suitability Map, scale 1:20.000;
 - o Typic Endoaquults Slope: 0-3% (856 ha)
 - o Typic Haplohemist, Peat < 1 m; Slope 0-3% (746 ha)
 - o Sapric Haplohemist, Peat 1 3 m; Slope: 0-3% (2,101 ha)
 - Sapric Haplohemist, Peat > 3m; Slope 0-3% (152 ha)
 - Marginal Suitable Area (S3): ± 746 ha (19,4%)
 - Unsuitable Area with Condition (N1): ± 3,109 ha (80,6%)
- Elevation Map, scale 1:20.000; Flat (0 8%): 3,855 ha.

Drainability Assessment to determine the long-term viability of the necessary drainage for oil palm growing has been conducted and documented in "Studi Drainase Di Areal Gambut Kebun Pangkatan PT Rantau Sinar Karsa (RSK), April 2016.

The conclusions from this study are as follows:

- Pangkatan Estate elevation ranges from 6 to 13 m asl, and it is above the merbau river with the lowest contour height is 1.3 m.
- The actual drainage class in general is S-3 which means that water excess can be released when the Merbau River water level is at the lowest level (LWL).
- Pangkatan Estate has a vary peat depth from 1 to > 3 m with good maturity level (saprik).

		- Minimum economic life span of peatlands in Pangkatan Estate is about 74.6 years and may change according to land management and drainage system.	
		Drainability Assessment in Tanjung Selamat Estate has been conducted and documented in "Laporan Studi Drainase Di Areal Gambut Kebun Tanjung Selamat PT Indo Sepadan Jaya, Maret 2017"	
		The conclusions from this study are as follows:	
		- Elevation range at Pangkatan Estate are 7 – 11 m asl, and it is above Kalundang river with the lowest contour 7.6 m.	
		- The actual drainage class at Tanjung Selamat Estate in general is S-2 which means that water excess can be released when the Kalundang River water level is at the middle level (MWL) to lowest level (LWL).	
		- Tanjung Selamat Estate has a vary peat depth from 1 to > 3 m with middle - good maturity level (hemik - saprik).	
		Minimum economic life span of peatlands at Tanjung Selamat Estate is about 103.3 years (4 planting period) and may change according to land management and drainage system.	
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.	There is no extensive planting conducted by unit of certification. Currently the whole area is replanting. The youngest planting in Tanjung Selamat Estate is 2017 and in Pangkatan Estate is 2020.	Complied
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	Map of soil based on soil survey as described in indicator 7.6.1 has been used to guide drainage and irrigation system, roads and other infrastructure.	Complied
Criteria	7.7: No new planting on peat, regardless of depth after 15 November 20	18 and all peatlands are managed responsibly.	
7.7.1	(C) No new planting on peatlands, regardless of depth, after 15 November 2018, in existing plantation areas, as well as in new development areas.	There is no new planting process performed by the unit of certification.	N/A



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7.7.2	Peat areas within the managed area are inventoried, documented and reported to the RSPO Secretariat (effective from November 15, 2018).	·					
	URAL NOTE: Maps and other documentation for peatlands are provide udit guide (See Procedural Notes for Indicator 7.7.5 below).	ed, prepare	ed and shared ac	ccording to the R	SPO Working Group	(Peatland Wo	rking Grou
7.7.3 (C) 9	(C) Subsidence of peat is monitored, documented and minimised.	documer	nt. The following per and September Previous (cm)	is an example	Peat Subsidence M of data for the pe 20 in Tanjung Selam Subsidence (cm)	riod June -	Complied
		A16f	22.0	22.0	0		
		B13j	21.0	21.5	0.5		
		C14i	20.3	21.0	0.7		
		D13g	18.5	19.0	0.5		
		A16f	22.0 Perio	d Sep – Dec 2020 23.0	1.0		
		B13j	21.5	22.0	0.5		
		C14i	21.0	22.0	1.0	1	
		D13g	19.0	20.0	1.0		
		Block D17j D20c C20b	ment for the perion Previous (cm) 5 0 24	Recent (cm) 5 0 24	ce, based on Peat per 2020 in Pangkata Subsidence (cm) 0 0		
		A17a	22.5	22.5	0		
		A16d	12	12	0	•	

		Minimizing peat subsidence performed by water management plan, constructing water gate, water level measurement and subsidence measurement. The company has established a documented water management program to ensure that subsidence of peat soils are minimized and monitored. There is sufficient evidence that the defined program was implemented. The company has installed water gate, main drain gate, peat subsidence monitoring, and washing drainage regularly, also monitoring of water level, main gate water lever, peat subsidence level.	
7.7.4	(C) Availability of implementation evidence of the water and land cover management program.	The unit of certification has documented water and ground cover management program and maintained records of monitoring subsidence of peat soils, i.e.:	Complied
		- Water Level Monitoring, using water level pole.	
		- Monitoring of Peat Subsidence, using peat subsidence pole.	
		- Water Table Monitoring, using piezometer.	
		Monitoring of water level and water table performed twice in a month. During visit to water table at Block C14i Tanjung Selamat Estate, found that water table is 70 cm from surface. During visit to water table at Block A16d Pangkatan Estate, found that water table is 72 cm from surface. This condition is due to there hasn't been any rain since late January 2021. Peat subsidence during field visit is 0 cm since September 2020, or 12 cm since 2015.	
		The total monitoring points for groundwater level are 19 points.	
		Groundwater level regulation activities are documented in the document "Pemantauan Muka Air Tanah". The following is an example of Groundwater Level Monitoring for the period of December 2020:	
		Block Date Ground water level (cm) Rainfall (mm)	
		A16f 07/12/2020 42 93	
		B13j 44 48	



		D13g		52		
		A16f B13j C14i D13g	21/12/2020	46 49 49 54	152,5	
				vel Report dated 29 Ja	level in Pangkatan Estate, anuary 2021: Ground water level	
		2° 9′ 12,5	ıde	Longitude 99° 59′ 1,2084″ E	(cm)	
		2º 11′ 35 2º 11′ 36	5,28" N 5,76" N	99° 58′ 35,76″ E 99° 59′ 42,80″ E	48 40	
		2º 12′ 42	2,84″ N	99º 59′ 51,18″ E	56	
7.7.5	(C) Drainability assessments are conducted for plantations planted on peat following the RSPO Drainability Assessment Procedure, or other method recognized by RSPO, (at least five years or in accordance with the provisions of the RSPO Drainability Assessment Procedure) before replanting. The results of the assessment are used to determine the period of replanting to be carried out, as well as to gradually replace	necessary drainage for oil palm growing has been conducted and documented in "Studi Drainase Di Areal Gambut Kebun Pangkatan PT Rantau Sinar Karsa (RSK), April 2016. Drainability assessment conducted by Research and Development department of company.				
	oil palm cultivation for at least 40 years or two cycles, (whichever is longer), before reaching the natural gravitational drainage limit for	1. Pangkat	an Estate ele	•	to 13 m asl, and it is above eight is 1.3 m.	
	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.					



- 3. Pangkatan Estate has a vary peat depth from 1 to > 3 m with good maturity level (saprik).
- 4. Minimum economic life span of peatlands in Pangkatan Estate is about 74.6 years and may change according to land management and drainage system.

PT Rantau Sinar Karsa – Pangkatan Estate has performed re-assessment of drainability in January 2020 following the RSPO Drainability assessment procedure 2019 and Peat Restoration Policy (based on Decree of Direktorat Jenderal Pengendalian Pencemaran dan Kerusakan lingkungan", summary of the study are as follow:

- 1. The natural drainage limit of the Pangkatan Estate is 79 cm obtained from the average water level of the Merbau River in 2018-2019.
- 2. The largest depth of peat in the Pangkatan Estate is 5.9 m.
- 3. Pangkatan Estate elevation ranges from 1.3 to 6.5 m above the Merbau River.
- 4. The rate of peat subsidence can be divided into 3 groups, namely shallow peat 0.7 cm/year, medium peat 1.7 cm/year and deep peat 3 cm/year.
- 5. Pangkatan Estate reaches the natural drainage limit soonest after 53 years on block B18c, so that the deadline for replanting can be done in block B18c is 13 years.

Drainability Assessment in Tanjung Selamat Estate also has been conducted and documented in "Laporan Studi Drainase Di Areal Gambut Kebun Tanjung Selamat PT Indo Sepadan Jaya, March 2017".

The conclusions from this study are as follows:

1. Elevation range at Pangkatan Estate are 7 - 11 m asl, and it is above Kalundang river with the lowest contour 7.6 m.



		2. The actual drainage class at Tanjung Selamat Estate in general is S-2 which means that water excess can be released when the Kalundang River water level is at the middle level (MWL) to lowest level (LWL).	
		3. Tanjung Selamat Estate has a vary peat depth from 1 to > 3 m with middle - good maturity level (hemik - saprik).	
		Minimum economic life span of peatlands at Tanjung Selamat Estate is about 103.3 years (4 planting period) and may change according to land management and drainage system.	
		Replanting program and activity in Pangkatan Estate has been done in 2020 and Tanjung Selamat Estate has been done in 2017 and there is no more replanting program and activity after 2020.	
currently the and will in unit of certurnits that The unit of the control of the current of the current of the current of the unit of the current of the cur	being adjusted / tested by the RSPO Working Group on Peatlands (Peatlande additional Guide on the steps to be followed after deciding not to tification concerned. It is recommended that the trial methodology period have plantations on peat) to utilize the methodology and provide input	sessment Guide along with related concepts and detailed actions is contained in land Working Group / PLWG). The final version must obtain PLWG approval in preplant and the consequences for other stakeholders, farmers, local commulis proposed to be extended for 12 months for all relevant management units (in the PLWG so that existing procedures can be further refined as needed before the revised Guidelines for the guidelines. Additional guidance for alternative contains.	January 2019 nities, and the management January 2020.
7.7.6	(C) All existing plantations on peat are managed according to applicable laws and/or "RSPO Guidelines for Best Management Practices (BMP) for Oil Palm Cultivation that are already on Peatlands", version 3 (June 2019) along with related audit guidelines (May 2019).	The unit of certification has established a procedure of Water Management AA-SOP-OP-1100.17-R1. Documented water management program to ensure that subsidence of peat soils is minimized and monitored has been established. There is sufficient evidence that the defined program was implemented. Water management procedure for peat land is implemented, the company has installed water gate, main drain gate, peat subsidence monitoring, and clean drainage regularly, also monitoring of water level and water table, main gate water level and peat subsidence level.	Complied
		The organization has documented water and ground cover management program and maintained records of monitoring subsidence of peat soils, i.e.:	



- Water Level Monitoring, using water level pole.
- Monitoring of Peat Subsidence, using peat subsidence pole. There are 4 pole subsidence installed in Tanjung Selamat Estate Block A16f, B13i, C14i and D13j. In Pangkatan Estate there are 12 subsidence poles installed in Block A18i, A18b, A16e, A17a, H92e, G92d, G92i, B18g, B18b, C91n, D17i and C91h.
- Water Table Monitoring, using piezometer. There are 4 piezometers installed in Tanjung Selamat Estate Block A16f, B13i, C14i and D13j. While in Pangkatan Estate there are 12 piezometers installed in Block A18i, A18b, A16e, A17a, H92e, G92d, G92i, B18g, B18b, C91n, D17i and C91h.

Monitoring of water level and water table performed twice in a month. During visit to water table at Block C14i Tanjung Selamat Estate, found that water table is 70 cm from surface. During visit to water table at Block A16d Pangkatan Estate, found that water table is 72 cm from surface. This condition is due to there hasn't been any rain since late January 2021. Peat subsidence during field visit is 0 cm since September 2020, or 12 cm since 2015.

Based on the meeting in November 2018 at the Directorate General of Environmental Pollution and Damage Elimination of the Ministry of Environment and Forestry - "Direktorat Jenderal Pengendalian Pencemaran dan Kerusakan Lingkungan Kementerian Lingkungan Hidup dan Kehutanan", PT Indo Sepadan Jaya is included in the Peat Restoration policy. So based on a letter from the Directorate General of Environmental Pollution and Damage Elimination of the Ministry of Environment and Forestry no. S.320/PPKL/PKG/PKL.6/11/2018 dated 22 November 2018, regarding the follow-up to the implementation of the restoration of peat ecosystems and the submission of a map of indications of damage to the peat ecosystem, that the company is mandatory to restore the function of



the peat ecosystem as stipulated in PermenLH no P.16/MENLHK/SETJEN/ KUM.1/2017 concerning technical guidelines for restoring peat ecosystem.

Tanjung Selamat Estate, PT Indo Sepadan Jaya has implemented a peat ecosystem restoration plan and recorded on "Rencana Pemulihan Ekosistem Gambut" and the document was sent to the Minister of Environment and Forestry on 11 March 2019, the document contains:

- 1) PT Indo Sepadan Jaya Peat Ecosystem Recovery Plan Document.
- 2) Map of peatland use area. As well as monitoring points for peat land.

Receipt of Plantation Unit Peat Damage Indication Map and/or Plantation Activities for submission in the form of Peat Ecosystem Damage Indication Map and/or Plantation Activities with no. S.320/PPKL/PKG/PKL.0/11/2018 dated 26 November 2018.

Available decree of "Direktur Jenderal Pengendalian Pencemaran dan Kerusakan Lingkungan" dated 26 July 2019, regarding "Penaatan Tinggi Muka Air Tanah dan Titik Stasiun Pemantauan Curah Hujan PT Indo Sepadan Jaya". Described map of monitoring point, person in charge, monitoring schedule once in two weeks, reporting obligation in three month intervals to "Direktur Jenderal Pengendalian Pencemaran dan Kerusakan Lingkungan Kementerian Lingkungan Hidup dan Kehutanan"; Governor of North Sumatera and Regent of Labuhanbatu Selatan Regency.

Pangkatan Estate, PT Rantau Sinar Karsa has established and sent Document of Peatland Ecosystem Restoration Plan to the "Direktorat Jenderal Pengendalian Pencemaran dan Kerusakan Lingkungan Kementerian Lingkungan Hidup dan Kehutanan" on 5 November 2019. Available letter from the Director General No. S.94/PPKL/PKG/PKLO/4/2019 dated 1 April 2019 regarding Instructions for implementing peat ecosystem restoration and submitting indications maps of peat ecosystem damage. Available map of damage to the peat ecosystem as attachment of Notes No. S.94/PPKL/PKG/PKLO/4/2019 dated 1 April 2019 in scale 1:24,000. The



		Ministry of Environment and Forestry has acknowledged the restoration plan.	
7.7.7	155 :		Complied

Criteria 7.8: Practices maintain the quality and availability of surface and groundwater.

No	Category of River Cros		Outside th	e Settlement	Inside a	a alata	
NO		Cross Section	Criteria	Minimum Riparian Zone	Criteria	Minimum Riparian Zone	Articles
1	Levee	٠٠.	-	5 m	×	3 m	Article 6
			Big River River Basin > 500 km2	100 m	Depth : > 20 m	30 m	Articles 7 & 8
2	Rivers with no dike (from river bank)	•			Depth : 3 m to 20 m	15 m	Articles7 & 8
			Small River River Basin < 500 km2	50 m	Depth: 0 m to 3 m	10 m	Articles7 & 8
3	Lake / Reservoir		=	50 m	5	50 m	Article 10
4	Water Springs		2	200 m	-	200 m	Article 10
5	Rivers affected by tides (from river bank)			100 m	-	100 m	Article 10

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:

PT Indo Sepadan Jaya – Tanjung Selamat POM and supply bases have established water management plan, consist of management water supply for domestic, water consumption and measurement of water quality. Identification water need as regulated in "Peraturan Menteri PU

Complied

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7.8.1a The unit of certification does not limit access to clean water or does not pollute the water used by the community.

No.14/PRT/M/2010 (domestic consumption is 60 liters/person/day and water needed for mill processing, Ground and surface water resources and its permit, management and monitoring waste water, included domestic waste water.

The Company has a water management document, both in the estate and mill. Monitoring the implementation of water management has been implemented on a regular basis, such as surface water quality monitoring each semester at Kalundang river (upstream and downstream) are available in the report of RKL/RPL. Company has analysed water quality each semester to ensure the compliance against PP No. 82 tahun 2001 regarding water quality standard, the result of water quality monitoring on 27 January 2020 by Laboratory BTKLPP Kelas I Medan (sample No. 2020-648,649,650-B and 2020-507, 508-K) shown that water quality is complies with national regulation.

Procedure SOP AA-APM-OP-1100.05. R1 "Konservasi Tanah dan Air" has been established to maintain the quality and availability of water. Procedures was also established for protection and management of riparian buffer zones at or before replanting. Procedure mentioned that in 50m on the left and right side of riparian buffer zones, estates are prohibited to apply agrochemical, used manual manuring and river bank was planted by erosion barrier crop (planting of "vetiver" grass, Pheronema canescens and Bamboosa sp). The organisation also has policy that prohibits estates for planting in 50m on the left and right side of riparian buffer zones at or before replanting. Warning board placed regarding prohibition to apply agrochemicals and fertiliser in the buffer zone. Riparian buffers of small natural water courses were 50 metres wide on both sides of the rivers as defined in the procedure AA-KL-12-EFP "Restorasi Riparian dan Areal Sekitar Danau/Waduk atau Mata Air lainnya". Several evidence of maintaining quality and availability of water were evident, such as plan and realisation of riparian management, installation of warning boards,

		planting erosion prevention plan (e.g.Pheronema canescens, Terminalia cattapa, Bamboosa sp and vetiver grass) and monitoring of water quality. DPT Indo Sepadan Jaya and PT Rantau Sinar Karsa does not limit access to clean water or does not pollute the water used by the community. Company has monitor clean water quality each semester to ensure the water use by community and employee are met with standard Permenkes No. 32 Tahun 2017 regarding clean water quality standard. Latest monitoring on 22 July 2020 by Laboratory BTKLPP Kelas I Medan shown that water quality is met with the standard (sample No. 2021-3127 & 3128-K).	
	7.8.1b Workers have adequate access to clean water.	Company provide the clean water for workers at housing area with ground water (drill well) at Ukui Estate and clean water from Mill for Mill workers Housing. Regular water analysis was performed to monitor the water quality. Water analysis performed by accredited laboratory "PT UNILAB PERDANA" each semester for Clean water. Sample seen on Clean Water analysis at Tanjung Selamat POM , Tanjung Selamat Estate and Pangkatan Estate 22 July 2020 by Laboratory BTKLPP Kelas I Medan (sample No. 2021-3127 & 3128-K); standard refer to PermenKes No. 32 year 2017 Appendix I, Chapter IIA, analysis result shown that all parameter analyzed are met with the standard regulation. Interview with workers during onsite audit confirmed that they have adequate access to clean water provide by company.	
7.8.2	(C) Water courses and wetlands are protected, including the maintenance and restoration of riparian zones and other buffer zones during or before replanting, in accordance with the "RSPO Manual on BMPs for the management and rehabilitation of riparian reserves" (April 2017) or Simplified Guide Management and Rehabilitation of Riparian Reserves (2018).	PT Indo Sepadan Jaya and PT Rantau Sinar Karsa has establish management plan to protect water courses and wetlands, including securing and maintaining appropriate riparian. - Riparian restoration with forest vegetation plant/tree. - Establish zone for zero chemical. No spraying and fertilizing along riparian zone. Based on visit in riparian zone (Sempadan Sungai Kalundang in Tanjung Selamat Estate and Sungai Merbau in Pangkatan Estate)	Complied

		 Conserve natural vegetation in riparian zone Restricted to conduct replanting palm oil in riparian area During field visit to Kalundang River at Tanjung Selamat Estate and Merbau River at Pangkatan Estate can be shown that riparian area are well maintained, no chemical application near to riparian, no disturbance on riparian, natural vegetation are protected and the signboard information and awareness are available. 	
7.8.3	Mill effluent is managed according to applicable regulations. The quality of mill effluent discharged, especially BOD (Biochemical Oxygen Demand) is monitored in accordance with applicable regulations.	Tanjung Selamat POM ahs an effluent treatment system (WWTP), which consists of Colling Pond, Primary Anaerobic pond, Secondary Anaerobic pond, Acidification pond, and Buffering pond. Procedure of WWTP operation available in Mill Policy Manual (MPM) dated February 1, 2013, chapter AA-MPM-OP-1400.13-R1. Tanjung Selamat POM has install Biogas power plant (Methane capture)since 2019 to generate electrical power by using waste water treatment. The biogas system has Anaerobic MBR system thorugh digester Thermophilic fermentation, and anaerobic membrane tank. According to effluent monitoring data, all produced mill effluent used for	Complied
		Biogas plant and after following the flow process of WWTP the waste water which has fullfill the standard/threshold discharged to the river. Mill holds permit to discharge waste water into the river from local authority through Decree number 503.660.31/397/DPMPTSP-BP2MNP/2018, issued on 21st September 2018 valid for 5 years. As required by permit, Mill conducts monthly check on discharged effluent in cooperation with accredited Laboratory (Laboratorium Balai Teknik Kesehatan Lingkungan dan Pengendalian Penyakit (BTKLPP) Kelas I Medan). According to recent testing result, all parameter of applied effluent has met the applicable threshold of PerMenLH No. 05 tahun 2014 Lampiran III regarding standard of effluent discharge to the river. Sample seen effluent monitoring year 2020:	



	Standard	Hasil Analisa					
Parameter	(mg/l)	Jan	Feb	Mar	Apr	Mei	Jun
TSS	250	63	82	127	85	85	63
pН	6.0 - 9.0	7.22	7.01	6.82	6.94	6.97	7.02
BOD	100	49.38	43.96	82.64	52.79	53.26	39.85
COD	350	172.8	153.9	289.2	184.6	186.4	139.5
Minyak dan Lemak	25	6.5	7.5	13.5	8.3	6.7	8.2
Nitrogen total	50	1.84	1.46	2.46	2.26	1.82	1.64
		Hasil Analisa					
	eter Standard (mg/l)						
Parameter	Standard (mg/l)	Jul	Agus	Sept	Okt	Nov	Des
Parameter TSS		Jul 42	Agus t	1	Okt 38	Nov 52	Des 82
	(mg/l)		t	Sept			
TSS	(mg/l) 250	42	t 87	Sept 49	38	52	82
TSS pH	(mg/l) 250 6.0 – 9.0	7.18	87 7.22 51.93 181.8	Sept 49 7.16	38 7.01 26.97 94.40	52 6.97	82 6.75
TSS pH BOD	(mg/l) 250 6.0 – 9.0 100	7.18 22.97	87 7.22 51.93	Sept 49 7.16 25.82	38 7.01 26.97	52 6.97 43.99	82 6.75 36.48
TSS pH BOD COD Minyak dan	(mg/l) 250 6.0 – 9.0 100 350	7.18 22.97 80.40	87 7.22 51.93 181.8	Sept 49 7.16 25.82 90.37	38 7.01 26.97 94.40	52 6.97 43.99 154.0	82 6.75 36.48 127.7
TSS pH BOD COD Minyak dan Lemak Nitrogen	(mg/l) 250 6.0 – 9.0 100 350 25 50 analysis res	42 7.18 22.97 80.40 3.8 1.56	87 7.22 51.93 181.8 9.7 2.28	Sept 49 7.16 25.82 90.37 6.9 2.46 2021 sti	38 7.01 26.97 94.40 6.2 2.48	52 6.97 43.99 154.0 9.2 2.16	82 6.75 36.48 127.7 11.8



		Budget in 2 has shown:	020 is 1.00 M3/Ton FFB,	record in January – December 2020			
				2020			
		Month	Water Volume (m ³)	Water consumption (m³/ton TBS)			
		Jan	15,565	0,99			
		Feb	16,023	0,99			
		Mar	15,973	0,97			
		Apr	16,310	0,95			
		May	10,550	0,96			
		Jun	15,110	0,95			
		Jul	15,735	0,95			
		Aug	19,135	0,95			
		Sep	18,795	0,95			
		Oct	16,010	0,94			
		Nov	13,623	0,95			
		Dec	15,889	0,95			
		Total Budget	188,718 271,559	0,96 1.00			
			2/1,559	1,00			
Criteria	7.9: Efficiency of fossil fuel use and the use of renewable energy is opting	nised					
7.9.1	Plans to increase the efficiency of fossil fuel use and to optimize renewable energy are available, monitored and documented PT Indo Sepadan Jaya and PT Rantau Sinar Karsa has prepared the program for improving efficiency of the use of fossil fuels and to optimize renewable energy under "Program Manajemen Lingkungan" year 2020/2021. To improving efficiency of the use of fossil fuels such monitoring on use of fossil fuels. Fossil fuel records was maintenance and the trends shown. Energy use records include accurate measurements of renewable energy use per ton of FFB processed. All the shell and fiber are consumed internally as boiler fuel. Fossil fuel usage is recorded for operational purpose, including the efficiency analysis. Since January – December 2020, shell usage for boiler fuel was 773 ton and Fiber usage as boiler fuel was 19,906 ton.						



Criteria 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed

7.10.1	(C) GHG emissions for the unit of certification are identified and	By June 2019 PT ISJ has operate Methane Capture.	Complied
	assessed. Plans to reduce or minimize GHG emissions are implemented, monitored through the PalmGHG calculator, and reported publicly.	PT Indo Sepadan Jaya has established "SOP Mitigasi gas Rumah Kaca AA-MPM-OP-1400.19.R1, dated 1 March 2015". Identification of pollutan and GHG has been implemented by Tanjung Selamat POM, Tanjung Selamat Estate and Pangkatan Estate, such as: usage of anorganic fertilizer, pesticide, fossil fuel usage, peat land, and POME.	
		Based on Significant pollution and GHG emission was identified, for estates comes from using of pesticides, action plan to reducing pesticide was made such as program of integrated pest control where minimize to use chemical/pesticides.	
		The Certificate Holder has Strategic and Mitigation Plan to reduce GHG emission, in example as follow:	
		Sector: Plantation operation	
		1.1. Identification of Emission Sources: Land Clearing and Planting (Land Use Change)	
		1.1.1. Activities: Land Clearing	
		1.1.1.1. Potential Mitigation Options:	
		Adopted Zero Burning Land Clearing methods	
		No Land Clearing in areas that identified as HCV area	
		 Keep the HCV area as Carbon Stock/sequestration 	
		Periodically inspection and patrol to avoid HCV disturbance and land fire	
		1.1.2. Activities: Fertilizing/Manuring	

		1.1.2.1. Potential Mitigation Options: • Effective fertilizing based on dosages and recommendation from Agronomy Department • No Fertilizing on Rainy • No Fertilizing on Riparian Zone • Socialization to Worker the policy of Fertilizing in Company The results of document verification and field visits, it is known that the company has made another efforts in reducing GHG emissions, such as: - Has installed a dust collector to catch dust or particles flying in the air and also has monitored the air quality carried out by conducting air quality testing and reported every semester contained in the UKL-UPL report. - The use of fiber and shells as a boiler fuel to minimize the fossil fuel usage. - Utilization of waste water for Land applications to minimize the methane emission. - Utilization of EFB for composting to minimize the anorganic/chemical fertilizer usage. Monitoring the physical condition of WWTP and perform the recorded volume of waste water that is applied.	
7.10.2	(C) Since 2014, an estimate of carbon stocks in the proposed development area has been carried out along with potential sources of emissions that can occur directly as a result of the development and plans to minimize these emissions are prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).	There Is no new planting. The company has started planting in 1984, no any new planting area/developing area since November 2005. Replanting has been performed since 2012 and planed until 2020. This indicator is Not Applicable	N/A

7.10.3	(C) Other significant pollutant identification results are available and plans to reduce or minimize them are implemented and monitored.	PT Indo Sepadan Jaya has identifiy other significant pollutant identification results as per "Evaluasi Aspek – Dampak Lingkungan" EMS-431-003-LT updated on January 2021.	Complied
		The Certificate Holder has implemented and monitored a plan to reduce pollutant and emission. Emission, particulate, and noise from boiler and generator are tested and monitored every six month. Records of all monitoring are kept and documented. According to record of emission and particulate monitoring shown that all parameter analysed were met with the threshold/standard.	
Criteria 7	7.11: Fire is not used for preparing land and is prevented in the manage	ed area.	
7.11.1	(C) Land for new planting or replanting is not prepared by burning.	The company has zero burning policy documented in "Kebijakan Perusahaan, 1 December 2019" stated in point 6: "Melakukan Praktek Tanpa Bakar dalam kegiatan pembangunan perkebunan dan secara aktif mendukung inisiatif mencegah dan mengawasi kebakaran hutan dan asap". The company has started planting in 1984. Curently there is no replanting activity in Tanjung Selamat Estate and Pangkatan Estate. Replanting has been performed since 2012 and planed until 2020.	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 Rantau Sinar Karsa after November 2005. The company has started planting in 1984. Curently there is no replanting activity in Tanjung Selamat Estate and Pangkatan Estate. Replanting has been performed since 2012 and planed until 2020.	N/A
		Replanting has been done mechanically, consist of: falling tree, chipping by excavator, terracing by excavator, digging, road construction, ditch/waterways construction, planting LCC and planting oil palm. Based on field visit to tanjung Selamat Estate and Pangkatan Estate confirmed that the land preparation is using mechanical method. No any open burning was noted for land preparation. It can also demonstrated in	



		the agreement contract between compay and subcontractor that all activity of replanting is performed manual and mechanically	
7.11.3	The unit of certification engages stakeholders in adjacent locations for fire prevention and control measures.	The policy has communicated to all smallholder and local community to engages stakeholders in adjacent locations for fire prevention and control measures. Replanting has been done mechanically, consist of: falling tree, chipping by excavator, terracing by excavator, digging, road construction, ditch/waterways construction, planting LCC and planting oil palm. Company has established "Ketentuan Replanting areal Mineral". In the mechanism explained that replanting must be conducted mechanicaly without burning.	Complied

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

PROCEDURAL NOTE for 7.12:

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

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

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

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

The development of this procedure will be guided by the No Deforestation Joint Steering Group (NDJSG) between the RSPO and HCSA members. In HFCC

countries, RSPO will work with governments, communities and other stakeholders to develop this procedure through participatory processes at national and regional levels. The duration of this activity is specified in the Terms of Reference for NDJSG and is publicly available.

L	 The database of data and the second of the s		
-	forest or any area required to protect or enhance HCVs. Land clearing	There Is no new planting. The company has started planting in 1984, no any new planting area/developing area since November 2005. Replanting	
	since 15 November 2018 has not damaged HCV or HCS forests.	has been performed since 2012 and planed until 2020. This indicator is Not Applicable.	

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	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).		
7.12.2	(C) HCV and HCS forests, and other conservation areas are identified as follows: 7.12.2a) For existing plantations, with an HCV assessments conducted by RSPO- approved assessors and have no new land clearing after 15 November 2018, the existing HCV assessments remains valid.	The Certificate Holder both of Tanjung Selamat and Pangkatan estates has conducted HCV assessment included both of planted area and the relevant wider landscape. The HCV assessment was conducted by the competent HCV assesors. There is no any revisions on HCV assessment and HCV areas since the last audit. Short explanation of HCV assessment documents as below: Tanjung Selamat Estate (under PT Indo Sepadan Jaya)	Complied
		The company has conducted HCV identification with collaborated IPB (Bogor Agriculture University) in 2013 as documented in "Laporan Akhir Kajian Penuh (Full Assessment) Identifikasi dan Analisis Keberadaan Nilai Konservasi Tinggi (NKT) di Areal PT Indo Sepadan Jaya – Kebun Tanjung Selamat Tahun 2014".	
		Assessor team consist of Dr. Ir. H. Nyoto Santoso, MS (Team Leader/RSPO HCV Assessor), Ahmad Faisal, S.Hut, MSI (Member /RSPO HCV Assessor), Eko Adhiyanto, S.Hut (Member); Sutopo S.Hut (Member /RSPO HCV Assessor); Rae Birumbo (Member), Arif Prasetyo, S.Hut	
		(Member). Peer Review by Mr Dr. Jarwadi Budi Hernowo (Independent Consultant/RSPO HCV Assessor) in January 2014.	
		Based on the assessment report, it was identified HCV area, such as: HCV 1.3: 1.24 ha and HCV: 5,33 ha (total HCV area 6.57 ha). It means HCV area was 0.16% from total area of Tanjung Selamat Estate (3.977 ha).	
		Pangkatan Estate (under PT Rantau Sinar Karsa) The company has conducted HCV identification with collaborated IPB (Bogor Agriculture University) in 2013 as documented in "Laporan Akhir Kajian Penuh (Full Assessment) Identifikasi dan Analisis Keberadaan Nilai	

		Konservasi Tinggi (NKT) di Areal PT Rantau Sinar Karsa – Kebun Pangkatan tahun 2014. Assessor team consist of Dr. Ir. H. Nyoto Santoso, MS (Team Leader/RSPO HCV Assessor), Ahmad Faisal, Shut, MSI (Member /RSPO HCV Assessor), Eko Adhiyanto, S.Hut (Member); Sutopo S.Hut (Member /RSPO HCV Assessor); Rae Birumbo (Member), Arif Prasetyo, S.Hut (Member). Peer Review by Mr Rachmad Hermawan (Independent Consultant/RSPO HCV Assessor) in January 2014 Based on the assessment report, it was identified HCV area, such as: HCV 1.3 and HCV 4.1 (110,87 Ha) as well as HCV 6 (0,04 Ha). So, total HCV area at Pangkatan estate was 110.91 ha. Therefore, total HCV area within Tanjung Selamat and Pangkatan estates was 117.48 ha	
	7.12.2 b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the latest HCSA Toolkit and HCV-HCSA Assessment Manual that is applicable at the time of the assessment. This includes stakeholder consultation and take into account wider landscape- level consideration.	There is no new planting. The company has started planting in 1984, no any new planting area/developing area since November 2005. Replanting has been performed since 2012 and planed until 2020. This indicator is Not Applicable.	
7.12.3	(C) In High Forest Cover Landscapes (HFCLs) within HFCCs, a specific procedure will apply for legacy cases and development by indigenous peoples and local communities with legal or customary rights, taking into consideration regional and national multi-stakeholder processes. Until this procedure is developed and endorsed, 7.12.2 applies.	There is no new planting. The company has started planting in 1984, no any new planting area/developing area since November 2005. Replanting has been performed since 2012 and planed until 2020. This indicator is Not Applicable	N/A
	OURAL NOTE for 7.12.3:		
Indicator	7.12.3. is not relevant to Indonesia, until further decisions by the RSPO.		
7.12.4	(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An Integrated management plans to protect and/or enhance HCV and HCS forests, peatland and other conservation areas	There is no new planting. The company has started planting in 1984, no any new planting area/developing area since November 2005. Replanting has been performed since 2012 and planed until 2020.	N/A

	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).	The company has established "Conservation Management Plan" to manage and to monitor of HCV area and RTE's species. HCV and wildlife/animal monitoring continuously conducted in a regular basis. Secondary monitoring conducted each month and primary monitoring conducted twice a year. Monitoring of animal/wildlife performed by HCV/Sustainability officer and field workers, result of monitoring presented in "laporan pemantauan Jenis satwa/tumbuhan". Report of Management and Monitoring for HCV and RTEs is reported every 6 months and review is conducted regularly to ensure that monitoring is effective. Reports period semester I and II 2020 are available on document "Laporan Monitoring Areal Konservasi". Based on document "Laporan Monitoring Areal Konservasi" for period January — Juny 2020 and July — December 2020, there is found and reported any RTE species (flora and fauna) within areas such as: Monyet ekor panjang (<i>Macaca fascicularis</i>), Elang tikus (<i>Ictinaetus malayensis</i>), Kuntul kecil (<i>Egretta garzeta</i>), cekakak belukar (<i>Halcyon smyrnensis</i>), burung pelatuk (<i>Dryocopus javensis</i>) etc.	
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.	There is no new planting. The company has started planting in 1984, no any new planting area/developing area since November 2005. Replanting has been performed since 2012 and planed until 2020. This indicator is Not Applicable	N/A
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.	The company has established "Conservation Management Plan" to manage and to monitor of RTE's. There was found RTEs such as: Kucing kuwuk (Prionailurus Bengalensis), Burung Madu kelapa (Anthreptes Malacensis), Elang Brontok (Nisaetus Cirrhatus), Kuntul kecil (Egretta garzeta) and etc. Company has monitor the RTE species and HCV area regularly.	Complied

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		Based on document "Laporan Monitoring Areal Konservasi" for period January – Juny 2020 and July – December 2020, there is found and reported any RTE species (flora and fauna) within areas such as: Monyet ekor panjang (Macaca fascicularis), Elang tikus (Ictinaetus malayensis), Kuntul kecil (Egretta garzeta), cekakak belukar (Halcyon smyrnensis), burung pelatuk (Dryocopus javensis) etc.	
7.12.7	The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.	There is no new planting. The company has started planting in 1984, no any new planting area/developing area since November 2005. Replanting has been performed since 2012 and planed until 2020. This indicator is Not Applicable	N/A
7.12.8	(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV- HCSA assessment since 15 November 2018, the Remediation and Compensation Procedures (RaCP) applies.	There is no new planting. The company has started planting in 1984, no any new planting area/developing area since November 2005. Replanting has been performed since 2012 and planed until 2020. This indicator is Not Applicable	N/A



Appendix B: Approved Time Bound Plan

PT INTI INDOSAWIT SUBUR

RSPO Membership Number: 1-0022-08-000-00

Latest Update: 1 July 2021

Name of Mill	of Mill Mill Address Name of Supply Estate Base Plantation Address			Time bound for certification	Status
Buatan I Mill	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau	Buatan Estate	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau		Certified on 16 September 2010 Re-Certified on 16 September 2015
		Buatan (Plasma)	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau		
Buatan II Mill	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau	Simpang Perak Estate*	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau		Certified on 16 September 2010 Re-Certified on 16 September 2015
		Buatan (Plasma)	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau		*Split From Buatan Estate Since 1 January 2019
Ukui I Mill	Ukui Village, Ukui District, Pelalawan Regency, Riau	Ukui Estate	Ukui Village, Ukui District, Pelalawan Regency, Riau		Certified on 1 March 2011 Re-Certified on 1 March 2016
		Sei Lala Estate*	Ukui Village, Ukui District, Pelalawan Regency, Riau		*Split From Ukui & Soga Estate Since 1 January 2019
		Ukui (Plasma)	Ukui & Lubuk Batu Jaya District, Pelalawan & Inhu Regency, Riau		Certified on 1 March 2011 Re-Certified on 1 March 2016
Ukui II Mill	Ukui Village, Ukui District, Pelalawan Regency, Riau	Soga Estate	Ukui Village, Ukui District, Pelalawan Regency, Riau		Certified on 1 March 2011 Re-Certified on 1 March 2016
	FACENCIA CONTRACTOR	Ukui (Plasma)	Ukui & Lubuk Batu Jaya District, Pelalawan & Inhu Regency, Riau		Certified on 1 March 2011 Re-Certified on 1 March 2016
Tungkal Ulu Mill	Pulau Pauh / Penyabungan / Merlung Village, Tungkal Ulu District, Tanjung Jabung Regency,	Tungkal Ulu Estate	Pulau Pauh / Penyabungan / Merlung Village, Tungkal Ulu District, Tanjung Jabung Regency, Jambi		Certified on 15 August 2012 Re-Certification on August 2017
	Jambi	Tungkal Ulu (Plasma)	Renah Mendalo, Merlung, Muara Papalik District, Tanjung Jabung Barat Regency, Jambi	8	Certified on 11 July 2013 Re-Certification on August 2017
Muara Bulian Mill	Singoan / Bukit Sari / Bulian Jaya Village, Muara Bulian / Pemayung District, Batang Hari Regency,	Muara Bulian Estate	Singoan / Bukit Sari / Bulian Jaya Village, Muara Bulian / Pemayung District, Batang Hari Regency, Jambi	ű.	Certified on 28 August 2012 Re-Certification on August 2017

Representative : Ivan Novrizaldie



PT INTI INDOSAWIT SUBUR

RSPO Membership Number: 1-0022-06-000-00

Latest Update: 1 July 2021

Name of Mill	Mill Address	Name of Supply Base Plantation	Estate Address	Time bound for certification	Status
	Jambi	Muara Bulian (Plasma)	Maro Sebo Ilir District, Batanghari Regency, Jambi		Certified on 12 July 2013 Re-Certification on August 2017
Topaz Mill	Petapahan Village, Tapung District, Kampar Regency, Riau	Topaz Estate	Petapahan Village, Tapung District, Kampar Regency, Riau		Certified on 30 March 2015
Taman Raja Mili	Lubuk Bernai / Kampung Baru / Pelabuhan Dagang / Pematang Pauh Vilage, Tungkal Ulu District, Tanjung Jabung Regency, Jambi	Taman Raja, Badang & Bernai Estate*	Lubuk Bemai / Kampung Baru / Pelabuhan Dagang / Pematang Pauh Vilage, Tungkal Ulu District, Tanjung Jabung Regency, Jambi		Certified on 20 February 2015 *Bernai Estate Split From Taman Raja & Badang Estate Since 1 January 2019
Segati Mill	Langkan / Penarikan / Tambak / Sotol Village, Langgam District, Pelalawan Regency, Riau	Segati Estate	Langkan / Penarikan / Tambak / Sotol Village, Langgam District, Pelalawan Regency, Riau	Main Audit in 2014	NPP & RaCP is still in Progress Re-Audit 2022 (Waiting for Concept Note)
		Gondai Estate	Pangkalan Sarik / Baru Village, Langgam / Siak Hulu District, Pelalawan / Kampar Regency, Riau	Main Audit in 2014	NPP & RaCP is still in Progress Re-Audit 2022 (Waiting for Concept Note)
Penarikan Mill	Penarikan Village, Langgam District, Pelalawan Regency, Riau	Penarikan Estate*	Penarikan / Tambak Village, Langgam District, Pelalawan Regency, Riau	*Main Audit in 2014	NPP & RaCP is still in Progress Re-Audit 2022 (Waiting for Concept Note)
Tanah Datar Mill	Tanah Datar Petatal Village, Talawi District, Asahan Regency, North Sumatera	Tanah Datar Estate	Tanah Datar Petatal Village, Talawi District, Asahan Regency, North Sumatera	2	Certified on 18 May 2015
		Bahilang Estate	Bahilang Village, Tebing Tinggi District, Serdang Bedagai Regency, North Sumatra	2022	"Bahilang Estate On Process RaCP (Recertification 2020)
Aek Nabara Mill	S1-S3 / Sukadame Village, Bilah Hulu / Kota Pinang District, Labuhan Batu Regency, North Sumatra	Aek Nabara Estate	S1-S3 / Sukadame Village, Bilah Hulu / Kota Pinang District, Labuhan Batu Regency, North Sumatra		Certified on 6 March 2015
Teluk Panjie	Teluk Panjie	Teluk Panjie	Teluk Panjie Village,		Certified on 21
Mill	Village, Kampung Rakyat District, Labuhan Batu Regency, North Sumatra	Estate (3,885 Ha) Teluk Panjie Estate (801 Ha)	Kampung Rakyat District, Labuhan Batu Regency, North Sumatra	2022	April 2015 HGU is still in Process
Peranap Mill	Simelinyang / Pauh Ranap / Sengkilo	Peranap Estate	Simelinyang / Pauh Ranap / Sengkilo		Certified on 7 January 2015

Representative : Ivan Novrizaldie



PT INTI INDOSAWIT SUBUR

RSPO Membership Number: 1-0022-06-000-00

Latest Update: 1 July 2021

Name of Mill	Mill Address	Name of Supply Base Plantation	Estate Address	Time bound for certification	Status
	Village, Peranap District, Indragiri Hulu Regency, Riau		Village, Peranap District, Indragiri Hulu Regency, Riau		
	*	Peranap (Plasma)	Simelinyang / Pauh Ranap / Sengkilo Village, Peranap District, Indragiri Hulu Regency, Riau		Certified on 18 August 2016
Bungo Tebo Mill	Tuo Sumai / Sungai Rambai Village, PWK Sumai / Tebo Ulu District, Bungo Tebo Regency,	Bungo Tebo Estate	Tuo Sumai / Sungai Rambai Village, PWK Sumai / Tebo Ulu District, Bungo Tebo Regency, Jambi		Certified on 3 December 2015
	Jambi	Bungo Tebo (Plasma)	Tuo Sumai / Sungai Rambai Village, PWK Sumai / Tebo Ulu District, Bungo Tebo Regency, Jambi		Certified on 7 February 2017
Tanjung Selamat Mill	Kampung Padang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	Tanjung Selamat	Kampung Padang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra		Certified on 26 May 2015
		Pangkatan	Sennah Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra		Certified on 26 May 2015
Gunung Melayu I	Rahuning Village, Bandar Pulau District, Asahan Regency, North Sumatra	Pulau Maria Estate	Rahuning Village, Bandar Pulau District, Asahan Regency, North Sumatra		Certified on 7 September 2015
Gunung Melayu II	Gonting Mahala Village, Bandar Pulau District, Asahan Regency, North Sumatra	Aek Tarum & Batu Anam Estate	Gonting Mahala Village, Bandar Pulau District, Asahan Regency, North Sumatra		Certified on 8 July 2015
		Sentral Estate	Gonting Mahala Village, Bandar Pulau District, Asahan Regency, North Sumatra	2022	"Sentral Estate On Process RaCP (Recertification 2020)
Negri Lama II	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North	Negri Lama	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	9	- Certified on 23 December 2016 as Independent Mill
	Sumatra	Aek Kuo (2,088 Ha)	Aek Korsik Village, Aek Natas District, Labuhan Batu		 Audit in 2016 as Mill and Supply Base
38		Aek Kuo (501 Ha)	Regency, North Sumatra	ş :	HGU Complete Audit at ASA 3 (2018)
Negri Lama I	Negri Lama Seberang Village, Bilah Hilir District,	*3 rd party which is excluded from scope of	Negri Lama Seberang Village, Bilah Hilir District, Labuhan		- Certified on 8 April 2015 - Audit in 2016

Representative : Ivan Novrizaldie



PT INTI INDOSAWIT SUBUR

RSPO Membership Number: 1-0022-08-000-00

Latest Update: 1 July 2021

Name of Mill	Mill Address	Name of Supply Base Plantation	Estate Address	Time bound for certification	Status
	Labuhan Batu Regency, North Sumatra	certification	Batu Regency, North Sumatra		as Independent Mill



Appendix C: GHG Reporting Executive Summary

The GHG emissions that were produced in **2020** for **PT Indo Sepadan Jaya – Tanjung Selamat POM** and supply base was calculated using the PalmGHG Calculator version 4.0. 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 **Tanjung Selamat POM** and supply base are as following:

Emission per product	tCO2e/tProduct
СРО	15.50
РКО	15.50

Extraction	%
OER	19.36
KER	4.28

Production	t/yr
FFB Process	190,184
CPO Produced	36,829
PKO Produced	8,147

Land Use	На
OP Planted Area	0
OP Planted on peat	7,643
Conservation (forested)	0
Conservation (non-forested)	117.48
Total	

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party	,	Total	
	tCO₂e	tCO ₂ e / FFB	tCO₂e	tCO ₂ e / FFB	tCO₂e	tCO ₂ e / FFB	tCO₂e	tCO ₂ e / FFB
Emission	Emission							
Land Conversion	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
CO ₂ Emission from fertilizer	2,884.04	0.03	1,349.57	0.05	0.00	0.00	4,233.62	0.02
NO ₂ Emission from peat	29,763.38	0.35	27,450.28	1.10	0.00	0.00	57,213.66	0.30
Fuel Consumption	466.55	0.01	725.32	0.03	0.00	0.00	1,191.87	0.01
Peat Oxidation	217,089.60	2.53	200,218.20	8.02	0.00	0.00	417,307.80	2.19
Sink	Sink							
Crop Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00



Sequestration Total	252538.8	2.95	230614.7	9.23	0.00	0.00	717882.1	3.77
Conservation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

^{*}Note: Includes both estates and smallholders

Summary of Mill Emission and Credit

	tCO₂e	tCO₂e/tFFB				
Emission						
POME	2,767.60	0.01				
Fuel Consumption	178.69	0.00				
Grid Electricity Utilization	63.70	0.00				
Credit	·					
Export of Grid Electricity	0.00	0.00				
Sales of PKS	-24,092.20	-0.13				
Sales of EFB	0.00	0.00				
Total	-21,082.22	-0.11				

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO₂e
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	0.00
Total Crusher emissions	0.00

^{*}This mill has no kernel crusher operation.

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

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



Appendix D: Supply Chain Declaration

A. M	A. Monthly Records of Certified and Uncertified FFB Received since the last audit					
No.	Month - Year	Volume of FFB from certified supply bases (mt)	Volume of FFB from uncertified supply bases (mt)	Total FFB/Month (mt)		
1	May 2019	9,791.89	9,460.76	19,252.66		
2	Jun 2019	8,011.09	6,051.13	14,062.22		
3	Jul 2019	9,712.42	11,996.95	21,709.37		
4	Aug 2019	11,386.54	10,662.03	22,048.57		
5	Sept 2019	11,093.72	10,221.71	21,315.43		
6	Oct 2019	10,362.07	9,374.52	19,736.59		
7	Nov 2019	8,199.59	7,839.58	16,039.18		
8	Dec 2019	7,613.31	6,847.12	14,460.43		
9	Jan 2020	7,293.50	7,835.07	15,128.57		
10	Feb 2020	7,954.13	7,693.29	15,647.42		
11	Mar 2020	8,238.25	7,545.98	15,784.23		
12	Apr 2020	8,970.05	7,529.03	16,499.08		
13	May 2020	7,064.38	3,562.25	10,626.62		
14	Jun 2020	7,566.98	7,553.48	15,120.46		
15	Jul 2020	10,517.06	5,422.29	15,939.32		
16	Aug 2020	12,664.94	6,851.07	19,516.02		
17	Sept 2020	12,308.85	6,926.69	19,235.54		
18	Oct 2020	9,723.77	6,873.86	16,597.63		
19	Nov 2020	8,589.01	5,304.08	13,893.09		
20	Dec 2020	9,724.11	6,471.59	16,195.69		
21	Jan 2021	9,488.67	6,563.80	16,052.47		
Note	Note:					

B. M	B. Monthly Records of Certified CPO & PK since the last audit				
No. Month - Year Certified CPO (mt) Certified PK (mt)		Certified PK (mt)			
1	May 2019	1,938.80	422.37		
2	Jun 2019	1,621.28	332.73		
3	Jul 2019	1,960.02	439.84		
4	Aug 2019	2,369.86	535.81		



5	Sept 2019	2,414.98	529.85
6	Oct 2019	2,143.30	475.44
7	Nov 2019	1,660.33	335.86
8	Dec 2019	1,510.76	351.25
9	Jan 2020	1,476.19	342.15
10	Feb 2020	1,615.90	383.79
11	Mar 2020	1,723.09	369.26
12	Apr 2020	1,837.02	407.21
13	May 2020	1,445.59	294.29
14	Jun 2020	1,530.38	309.98
15	Jul 2020	2,050.92	427.87
16	Aug 2020	2,617.81	518.93
17	Sept 2020	2,568.72	511.17
18	Oct 2020	1,995.16	402.39
19	Nov 2020	1,724.60	349.53
20	Dec 2020	1,951.07	394.31
21	Jan 2021	1,919.59	386.95
Note	:		

C. R	C. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any)				
No.	Buyers Name	PalmTrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)	
1	AAAOF Pte Ltd		2,189.15	-	
2	PT SDS		2,681.36	-	
3	PT HSJ – Negeri Lama II KCP		-	8,128.43	
4	PT SSL – Gunung Melayu I KCP		-	74.33	
5	PT SDS		-	164.29	
Total	Total 4,870.51 8,367.05				
Note	Note:				

D. R	D. Records of CPO & PK Sold under other schemes since the last audit (if any)			
No.	No. Buyers Name Scheme Name CPO Sold PK Sold (mt) (mt)			
1	PT SDS	ISCC	34,620.11	



Note:		

E. R	E. Records of CPO & PK Sold as conventional since the last audit (if any)					
No.	No. Buyers Name CPO Sold (mt) PK Sold (mt)					
	Nil					
Note	Note:					

F. R	F. Records of Certified CPO Sold under RSPO Credits since the last audit (if any)				
No.	No. Buyers Name PalmTrace Trading RSPO Credits of License Number Certified CPO Sold (m				
1	1 RSPO Credit Palm Trace 550				
Note	Note:				

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RSPO P&C Public Summary Report Revision 11 (Sept 2020)

Appendix E: Location Map of Certification Unit and Supply bases

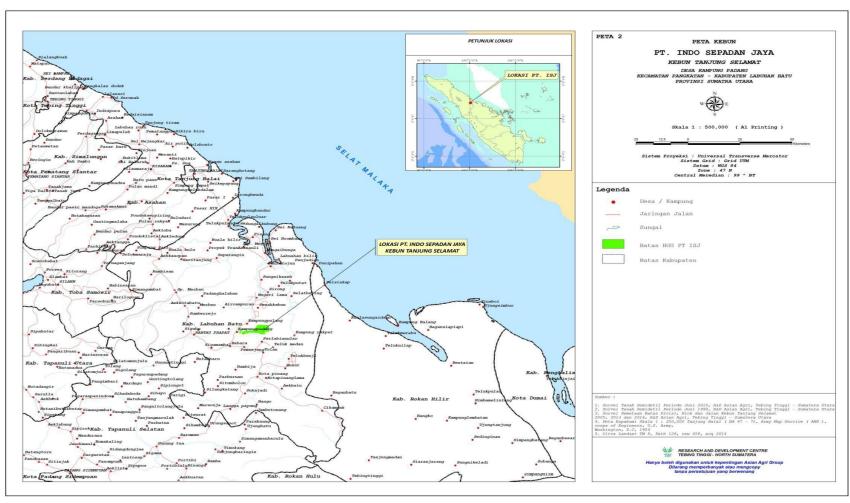
Figure 1 . Location of PT. Indo Sepadan Jaya & PT Rantau Sinar Karsa in Indonesia.



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Figure 2. Location of PT. Indo Sepadan Jaya & PT Rantau Sinar Karsa in North Sumatera Province, Indonesia.



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Appendix F: Estate Field Map

Figure 3a. Location of PT Indo Sepadan Jaya and neighbouring entities

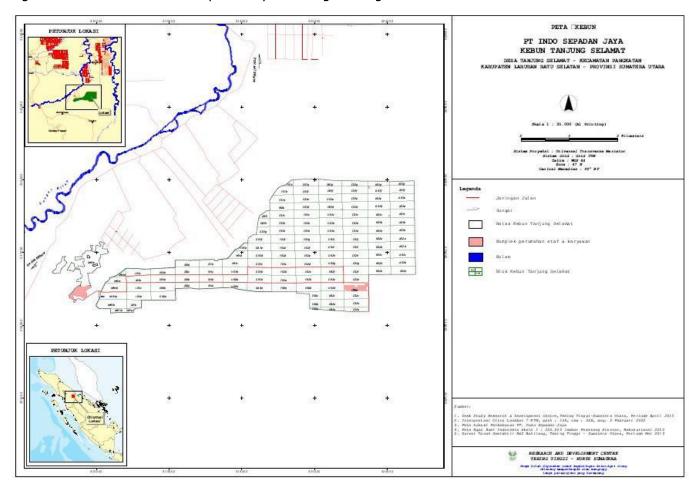
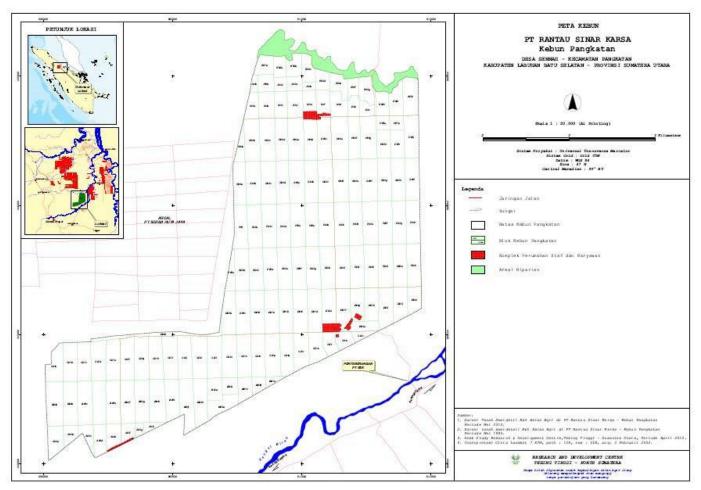




Figure 3b. Location of PT Rantau Sinar Karsa (Pangkatan Estate) and neighbouring entities





Appendix G: List of Smallholder Sampled

(Not applicable – No scheme Smallholder)



Appendix H: List of Abbreviations

a.i Active Ingredient

BOD Biochemical Oxygen Demand

CB Certification Bodies

CHRA Chemical Health Risk Assessment

COD Chemical Oxygen Demand

CPO Crude Palm Oil

CSPO Certified Sustainable Palm Oil
CSPKO Certified Sustainable Palm Kernel Oil

EFB Empty Fruit Bunch

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

FFB Fresh Fruit Bunch

FPIC Free, Prior, Informed and Consent

GAP Good Agricultural Practice

GHG Greenhouse Gas

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

IP Identity Preserved

IS - CSPO Independent Smallholder Certified Sustainable Palm Oil

IS – CSPKO Independent Smallholder Certified Sustainable Palm Kernel Oil
IS – CSPKE Independent Smallholder Certified Sustainable Palm Kernel Expeller

ISCC International Sustainable Carbon Certification

LD50 Lethal Dose for 50 sample

MB Mass Balance

MSDS Material Safety Data Sheet

MT Metric Tonnes
OER Oil Extraction Rate

OSH Occupational Safety and Health

PK Palm Kernel
PKO Palm Kernel Oil
POM Palm Oil Mill

POME Palm Oil Mill Effluent

PPE Personal Protective Equipment
RSPO Roundtable on Sustainable Palm Oil

P&C Principles & Criteria

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

SEIA Social & Environmental Impact Assessment

SIA Social Impact Assessment SOP Standard Operating Procedure