

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

- Initial Assessment
 Annual Surveillance Assessment (1_1)
 Recertification Assessment (Choose an item.)
 Extension of Scope

<p>Client Company name (Parent Company): SIPEF Group</p>
<p>Client company Address: Forum Nine Building, 10th Floor, Suite 1-11 Jl.Imam Bonjol No.9 Medan – 20112 Sumatera Utara Province Indonesia</p>
<p>Certification Unit: PT Umbul Mas Wisesa – Umbul Mas Wisesa Palm Oil Mill</p> <p>Location of Certification Unit: Tanjung Mulila Village, Kampung Rakyat District, Labuhanbatu Selatan Regency North Sumatra Province, Indonesia</p>
<p>Date of Final Report: 31st March 2021</p>

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Section 1: Scope of the Certification Assessment

1. Company Details			
Parent Company	SIPEF Group		
RSPO Membership Number	1-0021-05-000-00	Membership Approval Date	7/12/2005
Address	Head Office: Forum Nine Building, 10th Floor, Suite 1-11 Jl.Imam Bonjol No.9 Medan – 20112 Sumatera Utara Province Indonesia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	PT Umbul Mas Wisesa Umbul Mas Wisesa Palm Oil Mill		
Location / Address	Plantation Office: Tanjung Mulia Village, Kampung Rakyat District, Labuhanbatu Selatan Regency, North Sumatra Province Indonesia		
Website	www.tolantiga.co.id		
Management Representative	Mr. Sander Van den Ende	E-mail	svdende@sipef.com
Telephone	+62 61 415 2043	Facsimile	+62 61 452 0908

2. Certification Information			
Certificate Number	RSPO 611834	Date of First Certification	27/03/2015
		Certificate Start Date	27/03/2020
		Certificate Expiry Date	26/03/2025
Scope of Certification	Production of sustainable Crude Palm Oil (CPO) and Palm Kernel (PK) at Umbul Mas Wisesa Palm Oil Mill with marketing activities through SIPEF N.V. The supply base consist of: three (3) company-owned estates, namely: Umbul Mas Wisesa South Estate, Umbul Mas Wisesa North Estate and Toton Usaha Mandiri Estate Mill capacity is 40 tonnes FFB/hour		
Visit Objectives	<ul style="list-style-type: none"> • Determination of the conformity of the client's management system, or parts of it, with audit criteria. • Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements. 		
Assessment Cycle	<input type="checkbox"/> Initial Assessment <input type="checkbox"/> Recertification Assessment (Choose an item.) <input checked="" type="checkbox"/> Annual Surveillance Assessment (RA 1 ; ASA 1) <input type="checkbox"/> Scope Extension		
Applicable Standards	<input type="checkbox"/> RSPO P&C 2018 for the Production of Sustainable Palm Oil <input checked="" type="checkbox"/> Indonesia National Interpretation 2020 for RSPO P&C 2018 for the Production of Sustainable Palm Oil <input type="checkbox"/> Group Certification 2016 <input type="checkbox"/> RSPO Independent Smallholders Standard 2019		
Supply Chain Module	<input checked="" type="checkbox"/> Identity Preserved <input type="checkbox"/> Mass Balance		

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3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
ISPO 611833	Indonesian Sustainable Palm Oil (ISPO)	PT BSI Group Indonesia	3 rd April 2022

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location	GPS Coordinates	
		Latitude	Longitude
Umbul Mas Wisesa POM	Tanjung Mulia Village, Kampung Rakyat District, Labuhanbatu Selatan Regency, North Sumatra Province, Indonesia	2° 12' 41.00" N	100°16' 20.00" E
Umbul Mas Wisesa South Estate	Tanjung Mulia Village, Kampung Rakyat District, Labuhanbatu Selatan Regency, North Sumatra Province, Indonesia	2° 13' 5.10" N	100°17' 12.40" E
Umbul Mas Wisesa North Estate	Sei Siarti Village, Panai Tengah District, Labuhanbatu Regency, North Sumatra Province, Indonesia	2° 15' 7.16" N	100°16' 43.01" E
Toton Usaha Mandiri Estate	Sei Siarti Village, Panai Tengah District, Labuhanbatu Regency, North Sumatra Province, Indonesia	2° 15' 7.16" N	100°16' 43.01" E

5. Description of Supply Base					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Umbul Mas South	4,446.18	-	337.43	4,783.61	92.94
Umbul Mas North	2,602.46	196.09	181.19	2,979.74	87.33
Toton Usaha Mandiri	1,134.95	57.54	6.27	1,198.76	94.68
Total	8,183.59	253.63	524.89	8,962.11	91.65

6. Plantings & Cycle							
Estate	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Umbul Mas Wisesa South	-	815.69	3,630.49	-	-	4,446.18	-
Umbul Mas Wisesa North	-	1,446.46	1,156.00	-	-	2,602.46	-
Toton Usaha Mandiri		486.14	648.81	-	-	1,134.95	-
Total (ha)		2,748.29	5,434.06	-	-	8,183.59	-

7. Certified Tonnage of FFB (Own Certified Scope)				
Estate	Tonnage / year			
	Estimated (Mar 2020– Feb 2021)	Actual		Forecast (Mar 2021 – Feb 2022)
		Previous license period (Jan 2020 - Feb 2020)	Current license period (Mar 2020 – Dec 2020)	
Umbul Mas Wisesa South	92,994.36	11,748.90	73,033.81	104,447.10
Umbul Mas Wisesa North	61,376.28	7,720.77	48,084.94	68,935.08
Toton Usaha Mandiri	26,968.26	3,681.17	21,961.39	30,289.66

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Total	181,339.00	166,230.98	203,671.84
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8. Certified Tonnage of FFB (from other certified unit(s))				
Estate	Tonnage / year			
	Estimated <i>(Mar 2020 – Feb 2021)</i>	Actual		Forecast <i>(Mar 2021 – Feb 2022)</i>
		<i>Previous license period (Jan 2020 - Feb 2020)</i>	<i>Current license period (Mar 2020 – Dec 2020)</i>	
Koperasi Serba Usaha Suka Makmur		105.95	477.10	
Total		583.05		

9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Independent FFB Supplier	Tonnage / year			
	Estimated <i>(Mar 2020 – Feb 2021)</i>	Actual		Forecast <i>(Mar 2021 – Feb 2022)</i>
		<i>Previous license period (Jan 2020 - Feb 2020)</i>	<i>Current license period (Mar 2020 – Dec 2020)</i>	
	N/A			N/A
-	-	-	-	-
Total	-	-		-

10. Certified Tonnage				
	Estimated <i>(Mar 2020 – Feb 2021)</i>	Actual		Forecast <i>(Mar 2021 – Feb 2022)</i>
	FFB	FFB		FFB
		<i>Previous license period (Jan 2020 - Feb 2020)</i>	<i>Current license period (Mar 2020 – Dec 2020)</i>	
Mill Capacity: 40 MT/hr	196,459.00* mt	23,150.84 mt	143,663.19 mt	203,671.84 mt
SCC Model: IP		CPO: 5,426.56 mt (OER: 23.44%)	CPO: 33,186.19 mt (OER: 23.10%)	CPO (OER 24.00%)
	46,258.68* mt			48,881.24 mt
		PK: 932.97 mt (KER: 4.03%)	PK: 5,847.09 mt (KER: 4.07%)	PK (KER: 4%)
	7,753.56* mt			8,146.87 mt
TOTAL	N/A			N/A

*including volume extension

11. Actual Sold Volume (CPO)					
Current License period					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	34,752.45	-	-	-	34,752.45
Previous License period					
CPO (MT)	2,595.13	-	-	-	2,595.13
Total	37,347.58	-	-	-	37,347.58

12. Actual Sold Volume (PK)					
Current License period					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
PK (MT)	6,308.44	-	-	-	6,308.44
Previous License period					
PK (MT)	333.11	-	-	-	333.11
Total	6,641.55				6,641.55

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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Representative: Nicholas Cheong (Nicholas.Cheong@bsigroup.com)
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BSI is a leading global provider of management systems assessment and certification, with more than 84,000 certified locations and clients in over 180 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (ASI-ACC-067) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia.

2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on 22 – 27 January 2021. The audit programme is included as Section 2.3. The approach to the audit was to treat the mill and supply base as an RSPO Certification Unit. A range of occupational health and safety, environmental, best practice management, and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas, local communities engagement and workers welfare and safety.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. Indonesia National Interpretation 2020 for RSPO P&C 2018 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.

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.

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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 (Recertification)	Year 2 (ASA1_1)	Year 3 (ASA1_2)	Year 4 (ASA1_3)	Year 5 (ASA1_4)
Umbul Mas Wisesa POM	V	V	V	V	V
Umbul Mas Wisesa South Estate	V	V	V	V	V
Umbul Mas Wisesa North Estate	V	V	V	V	V
Toton Usaha Mandiri Estate	V	V	V	V	V

Tentative Date of Next Visit: January 3, 2022 - January 8, 2022
Total No. of Mandays: 16

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2.2 BSI Assessment Team:

Team Member Name	Role <i>(Team Leader or Team member)</i>	Qualifications <i>(Short description of the team members)</i>
Imam Fakhruzi	Team Leader	Imam holds degree in Agriculture Technology and graduated from Gadjah Mada University, Yogyakarta on 2011. He had 2 (two) years working experience related to oil palm industry, as a sustainability and HSE officer in oil palm Plantation Company in Indonesia. Imam has completed a number of relevant trainings, the training includes ISO 9001:2008 and EMS 14001:2004 Lead Auditor, Lead Auditor of SMK3, RSPO P&C Lead auditor endorsed course. Currently he works for BSI Group based in Jakarta office. He is one of the BSI qualified RSPO auditor. He had been involved in RSPO auditing since 2015. During this assessment, he assessed on the aspects of Social Aspect, Environmental aspect-impacts, Occupational Health and Safety.
Eko Purwanto	Team Member	Holds a Bachelor of Forestry from Forest Conservation Department, Faculty of Forestry, Bogor Institute of Agriculture (IPB) in 2001. He has working experience at Oil Palm Plantation in East Kalimantan since 2003 to 2012, the last position was Estate Manager. He has implementing good agricultural practice including integrated pest management and limited pesticides uses. He has completed lead auditor training courses for RSPO P&C (2013), ISO 9001:2008 (2012), ISO 14001:2004 (2013), ISPO (2012), and RSPO SCC (2012). He has also completed training course of ISO 14001 (2012), Minaut Indonesia (2011) and Introduction to HCV Toolkit HCV (2011). For the last 2 years, he has been involved in quality (ISO 9001) management system audits for very broad industrial and involved in Indonesia Sustainable Palm Oil (ISPO) audit for several plantations and mills since October 2012. During this assessment, he assessed on the aspects of mill and estate best management practices and supply chain for CPO mills. He is fluent in both verbal/written in English.
Yudwi Wisnu Rahmanto	Team Member	Holds a Bachelor of Forestry with Silviculture background. He worked at professional independent Certification Body as an Auditor for last 8 years and has involved in auditing activities with various certification schemes. Selected training which have been followed, such as RSPO Endorsed Lead Auditor Training Course, RSPO NEXT Lead Auditor Course, ISPO Auditor/Lead Auditor Course, Quality Management System (QMS) ISO 9001 Auditor/Lead Auditor Course, ISO 14001, OHSAS 18001 Lead Auditor Course, GIS-Basic Mapping and Spatial Analysis, Timber Legality Assurance System (SVLK), Verification Organization Training C.A.F.E Practices (Starbucks), UTZ Programme and others internal training programs. During the assessment he assigned to verify Best Practices Management, GHG and Continual Improvement aspect. He is fluent in both verbal/written in English.

Accompanying Persons:

Name	Role
Nill	

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2.3 Assessment Plan

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

Date	Time	Description	IF	EP	YWR
Friday, 22/01/2021	08.00 – 08.45	Opening Meeting <ul style="list-style-type: none"> Presentation by client (Overview of PT Umbul Mas Wisesa - UMW Palm Oil Mill and its supply base); Presentation by BSI team (Objective, scope, audit plan, etc.) 	√	√	√
	09.00 – 12.00	UMW POM: RSPO Document Review General information, Time bound plan, partial certification verification, RSPO P&C (for Principle 1-7) RSPO SCCS	√	√	√
	12.00 – 14.00	Break	√	√	√
	14.00 – 17.00	UMW POM – continued: RSPO Document Review General information, Time bound plan, partial certification verification, RSPO P&C (for Principle 1-7) RSPO SCCS	√	√	√
Saturday, 23/01/2021	08.00 – 12.00	UMW POM: Field Visit Visit and observing Mill Best Management Practices and Environmental management implementation and interview with workers. Visit and observing Occupational Safety and Health management, (including but not limited to: use of PPE, safe working environment, walk ways, signs, palm oil mill effluent, diesel tanks, fire extinguishers, emission, first aiders and boxes, etc) and interview with workers. Field Visit RSPO SCCS Implementation	√	√	√
Monday, 25/01/2021	08.00 – 12.00	UMW South Estate: Field observation and Worker interview FFB harvesting, FFB loading, road maintenance, IPM HCV's, riparian zones, boundaries inspection, landfill (waste management), Workshop, water management, housing, social amenities, school, clinic Herbicide application programs, fertilizer application, chemical and fertilizer warehouse, hazardous waste storage, etc.	√	√	

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Date	Time	Description	IF	EP	YWR
		Stakeholder Consultation: Visit and interview with government offices in Kabupaten Labuhanbatu Selatan and local NGO (if any). <ul style="list-style-type: none"> • Labour Agency (Disnakertrans) of Labuhanbatu Selatan Regency. • National Land Agency (Kantor Pertanahan) of Labuhanbatu Selatan Regency. • Plantation Agency (Disbun) of Labuhanbatu Selatan Regency. • Head of village, cooperatives, community leader, contractors). 			√
	12.00 – 14.00	Break	√	√	√
	14.00 – 17.00	UMW South Estate: RSPO Document Review: RSPO P&C (for Principle 1-7)	√	√	√
Thursday, 26/01/2021	08.00 – 12.00	UMW North Estate: Field observation and Worker interview FFB harvesting, FFB loading, road maintenance, IPM HCV's, riparian zones, boundaries inspection, landfill (waste management), Workshop, water management, housing, social amenities, school, clinic Herbicide application programs, fertilizer application, chemical and fertilizer warehouse, hazardous waste storage, etc.	√	√	√
	12.00 – 14.00	Break	√	√	√
	14.00 – 17.00	UMW North Estate: RSPO Document Review: RSPO P&C (for Principle 1-7)	√	√	√
Wednesday 27/01/2021	08.00 – 12.00	TUM Estate: Field observation and Worker interview FFB harvesting, FFB loading, road maintenance, IPM HCV's, riparian zones, boundaries inspection, landfill (waste management), Workshop, water management, housing, social amenities, school, clinic Herbicide application programs, fertilizer application, chemical and fertilizer warehouse, hazardous waste storage, etc.	√	√	√
	12.00 – 14.00	Break	√	√	√
	14.00 – 17.00	TUME Estate: RSPO Document Review: RSPO P&C (for Principle 1-7)	√	√	√
Thursday, 28/01/2021	08.00 – 12.00	RSPO Document Review – continued RSPO P&C (for Principle 1-7)	√	√	√
	12.00 – 14.00	Break	√	√	√
	14.00 – 15.30	RSPO Document Review – continued RSPO P&C (for Principle 1-7)	√	√	√
	15.30 – 16.00	Report Preparation and Auditor Discussion	√	√	√

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Date	Time	Description	IF	EP	YWR
	16.00 – 17.00	Closing Meeting	√	√	√
Friday, 29/01/2021		Travel back to Jakarta	√	√	√

Section 3: Assessment Findings

3.1 Normative requirement applied for this assessment:

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

3.2 Multiple Management Units and Time Bound Plan

Time Bound Plan		
Requirement	Remarks	Compliance
Does the plan include all current subsidiaries, estates and mills that is under the control of the holding company?	PT Umbul Mas Wisesa – Umbul Mas Wisesa Palm Oil Mill is a subsidiary of SIPEF Group. SIPEF Group has disclose all of its companies, mills and estates. The timebound plan including un-certified units/companies.	Yes
Have all the estates and mills certified within five years after obtaining RSPO membership?	No. Not all the estates and mills certified within five years after obtaining RSPO membership. New estates and mills are under progress to be RSPO certified after RSPO NPP carried out in 2014.	Yes
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three-year from the date of acquisition. Certification plan for the new acquisition shall be available.	The latest acquisition noted for PT. Asri Rimba Wirabhakti in Bengkulu, announced end of 2018. Certification plan have been prepared, awaiting for RSPO LUC, RSPO RACP and RSPO NPP.	Yes
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?	Yes, there is changes from the last audit to include PT. Asri Rimba into timebound plan. Waiting for HCV ALS review, LUC review for preparation into RSPO NPP.	Yes
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	No isolated lapse. SIPEF is able to demonstrate adequate evidence related to changes in implementation of the plan.	Yes
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised	The delay of not able to certify all the estate within the 5 years period from the day of RSPO membership is accepted by the assessment team.	Yes
Un-Certified Units or Holdings		
No replacement after dates defined in NIs Criterion 7.3: <ul style="list-style-type: none"> • Primary forest. • Any area required to maintain or enhance HCVs in accordance with RSPO P&C criterion 7.3. 	Assessment team checked to confirm any land conflict/liabilities on RaCP tracker and found note "The compensation plans for PT. Umbul Mas Wisesa and PT. Toton Usaha Mandiri (SIPEF) have been approved by the Compensation Task Force during the staged implementation of the RaCP between May 2014 and November 2015".	Yes

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<p>Any new plantings since January 1st 2010 shall comply with the RSPO New Plantings Procedure.</p>	<p>All new planting after January 1st, 2010 have undergone and complies with RSPO New Planting Procedure.</p>	<p>Yes</p>
<p>Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 2.2, 6.4, 7.5 and 7.6. The RSPO RaCP tracker shall be checked to confirm for any land conflicts/Liabilities https://www.rspo.org/certification/remediation-and-compensation/racp-tracker. The progress on the Liabilities shall be verified and reported.</p>	<p>The assessment team has conducted a search in internet to confirm that there is a lodged land conflict that was recorded as complaint under RSPO Case Tracker; raised by individual on those units that have not been certified.</p> <p>RSPO Case Tracker recorded complaint to PT. Agro Muara Rupit, dated 17 May 2017. The complainant brought forward the issue of fraudulent land title to RSPO. The complainant claimed that his land was fraudulently sold by his cousin to PT. Agro Muara Rupit, a subsidiary of SIPEF Group. The summary presented in the RSPO Case Tracker:</p> <p>On 25 July 2017 - Secretariat to write to the company and inform them on the complaint. On 24 August 2017 (CP Meeting) - Secretariat to wait for reply from the company. On 28 August 2017 - Secretariat received response from the company. On 5 September 2017 - Complainant failed to provide the document. On 11 September 2017 - Secretariat has sent an email to SIPEF. On 26 September 2017 (CP Meeting) - Secretariat to draft the decision letter. On 18 June 2018 – Complaint Panel to deliver a decision. On 25 July 2018 – Complaint Panel to deliver a decision. On 23 August 2018 – Draft decision letter to be reformatted. On 19 September 2018 – Decision Letter – Complaints Panel. On 26 September 2018 – The decision letter finalised and to be delivered to Parties. On 24 October 2018 – Complaint Panel Decision letter has been sent to parties. Deadline for submission of appeals is on 20 December 2018. On 20 December 2018 – The complaint is officially closed.</p> <p>The case tracker available on link https://askrspo.force.com/Complaint/s/case/5090000028Es1JAAS/detail</p>	<p>Yes</p>
<p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO</p>	<p>No labor dispute noted. The assessment team has conducted a search in internet to</p>	<p>Yes</p>

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P&C criterion 6.3.	confirm that there is no new comments or dispute raised by the communities on those units that have not been certified.	
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	No legal non-compliance noted. The assessment team has conducted a search in internet to confirm that there is not new comments or dispute raised by the communities on those units that have not been certified.	Yes
Did the company conduct internal audit against the uncertified management units requirement? If yes, a positive assurance statement shall be available.	<p>The internal audit against the uncertified management units requirement has been conducted for all uncertified units:</p> <ul style="list-style-type: none"> • PT. Agro Rawas Ulu was conducted on 20-21 March 2019 – including assessment against criterion 2.1; 2.2; 2.3; 6.3; 6.4; 7.3; 7.5; 7.6; • PT. Agro Kati Lama was conducted on 4-6 March 2019 assessing criterion 2.1; 2.2; 2.3; 6.3; 6.4; 7.3; 7.5; 7.6; • PT. Agro Muara Rupit was conducted on 18-20 March 2019 – including assessment against criterion 2.1; 2.2; 2.3; 6.3; 6.4; 7.3; 7.5; 7.6; <p>Each company provide correction and corrective action on the base to ensure all RSPO P&C requirements are implemented.</p>	Yes
Have there been any stakeholder (including NGO) consultation conducted?	<p>Yes. Stakeholder comments are noted. The assessment team has conducted a search in internet to confirm that there is a comment that was recorded as complaint under RSPO Case Tracker; raised by the individual on those units that have not been certified. RSPO Case Tracker recorded complaint to PT. Agro Muara Rupit, dated 17 May 2017. The complainant brought forward the issue of fraudulent land title to RSPO. The complainant claimed that his land was fraudulently sold by his cousin to PT. Agro Muara Rupit, a subsidiary of SIPEF Group. The summary presented in the RSPO Case Tracker:</p> <p>On 25 July 2017 - Secretariat to write to the company and inform them on the complaint. On 24 August 2017 (CP Meeting) - Secretariat to wait for reply from the company. On 28 August 2017 - Secretariat received response from the company. On 5 September 2017 - Complainant failed to provide the document. On 11 September 2017 - Secretariat has sent an email to SIPEF.</p>	Yes

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	<p>On 26 September 2017 (CP Meeting) - Secretariat to draft the decision letter.</p> <p>On 18 June 2018 – Complaint Panel to deliver a decision.</p> <p>On 25 July 2018 – Complaint Panel to deliver a decision.</p> <p>On 23 August 2018 – Draft decision letter to be reformatted.</p> <p>On 19 September 2018 – Decision Letter – Complaints Panel.</p> <p>On 26 September 2018 – The decision letter finalised and to be delivered to Parties.</p> <p>On 24 October 2018 – Complaint Panel Decision letter has been sent to parties. Deadline for submission of appeals is on 20 December 2018.</p> <p>On 20 December 2018 – The complaint is officially closed.</p> <p>The case tracker available on link https://askrspo.force.com/Complaint/s/case/5090000028Es1JAAS/detail</p>	
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3.3 Progress of scheme smallholders and/or outgrowers (if applicable to this assessment)

Progress of scheme smallholders or outgrowers towards compliance with relevant standards		
Requirement	Remarks	Compliance
<p>Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification? OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years.</p>	<p>Yes. PT Umbul Mas Wisesa - UMW POM put all of the smallholder into certification.</p>	<p>Comply</p>

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 (ASA 1_1) there were no Critical; no Minor nonconformities and no Opportunity For Improvement raised.

The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment. The implementation of the Corrective Actions for the Critical Nonconformity(ies) has been verified for its effectiveness and closed accordingly. The below is the summary of the non-conformity raised during this assessment.

Non-conformity			
NCR Ref #	Null	Clause & Category (Major / Minor)	
Date Issued		Due Date	
Closed (Yes / No)		Date of nonconformity Closure	
Statement of Nonconformity:			
Requirement Reference:			

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Objective Evidence:	
Corrections:	
Root Cause Analysis:	
Corrective Actions:	
Assessment Conclusion:	

Opportunity for Improvements	
OFI #	Description
OFI 1	-

Positive Findings	
PF #	Description
PF 1	-

3.4.1 Status of Nonconformities Previously Identified and Observations

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

Opportunity for Improvement	
OFI#	Description
OFI 1	

3.4.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Major / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1025752M0	Major	2.1.2	12 th May 2014	Closed on 4 th September 2014
1025752M29	Major	RSPO NPP	12 th May 2014	Closed on 10 th November 2014
1048188M10	Major	5.6.2	12 th May 2014	Closed on 4 th September 2014
1048188M1	Major	4.7.1	12 th May 2014	Closed on 4 th September 2014
1048188M2	Major	5.1.2	12 th May 2014	Closed on 4 th September 2014
1048188M9	Major	5.3.2	12 th May 2014	Closed on 4 th September 2014
1048188N12	Minor	4.4.2	12 th May 2014	Closed on 29 th January 2016
1048188N13	Minor	4.4.3	12 th May 2014	Closed on 29 th January 2016
1048188N14	Minor	4.4.4	12 th May 2014	Closed on 29 th January 2016
1048188N4	Minor	4.7.4	12 th May 2014	Closed on 29 th January 2016
1048188N15	Minor	4.7.6	12 th May 2014	Closed on 29 th January 2016

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1048188N16	Minor	5.4.1	12 th May 2014	Closed on 29 th January 2016
1048188N18	Minor	5.4.2	12 th May 2014	Closed on 29 th January 2016
1048188N1	Minor	6.3.2	12 th May 2014	Closed on 29 th January 2016
1048188N2	Minor	7.4.2	12 th May 2014	Closed on 29 th January 2016
1578496-201801-N1	Minor	5.3.3	16 th January 2018	Closed on 15 th January 2019
1725398-201901-M1	Major	4.6.3	24 th January 2019	Closed on 5 th March 2019
1725398-201901-M2	Major	6.5.2	24 th January 2019	Closed on 5 th March 2019
1725398-201901-M3	Major	SCCS 5.3.2	24 th January 2019	Closed on 5 th March 2019
1725398-201901-M4	Major	SCCS 5.13.2	24 th January 2019	Closed on 5 th March 2019
1725398-201901-N1	Minor	6.8.3	24 th January 2019	Closed on 24 th January 2020

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 Umbul Mas Wisesa – UMW POM Certification Unit’s environmental and social performance, legal and any known dispute issues.

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

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

List of Stakeholders contacted	
Internal Stakeholders <ul style="list-style-type: none"> Gender Committee 	Union/Contractors/Local Communities <ul style="list-style-type: none"> Serikat Pekerja Umbul Mandiri (SPUM) Induk PT. Umbul Mas Wisesa Village Head of Tanjung Mulia Village.
Government Departments <ul style="list-style-type: none"> Environmental Agency (Dinas Lingkungan Hidup) of Labuhanbatu Selatan Regency. Manpower Agency (Dinas Tenaga Kerja) of Labuhanbatu Selatan Regency. Plantation Agency (Dinas Perkebunan) of Labuhanbatu Selatan Regency. 	NGO (by phone) Jaringan Pendamping Kebijakan Pembangunan Desa (JPKP) Kabupaten Labuhanbatu Selatan.

Stakeholders comment	
1	Feedbacks: Environmental Agency (Dinas Lingkungan Hidup) of Labuhanbatu Selatan Regency: <ul style="list-style-type: none"> PT Umbul Mas Wisesa already has environmental document in the form of AMDAL approved by Badan Lingkungan Hidup Kabupaten Labuhan Batu No. 660/324/BLH-LB/AM/2009, dated 03 July 2009. Report of the implementation of RKL-RPL has been sent periodically to Dinas Lingkungan in Labuhanbatu Selatan Regency. Latest for second semester year 2020 (July – December). PT Umbul Mas Wisesa has managed hazardous waste according to regulation,

	<ul style="list-style-type: none"> • Good environmental management has performed by companies, eg: pollution and emissions management in plantation environment (still below the quality standard), for example: waste water and air emissions. • There are no reports from stakeholders related to environmental pollution. • There is no land fire in the area of plantation both of Umbul Mas Estate (North and South) and Toton Usaha Mandiri Estate. • Fire monitoring and firefighting reported routinely to environmental office. • The management of peat soil has meet government regulation. <p>Management Responses: Positive Comments. PT Umbul Mas Wisesa will continue to implement the environmental requirement as per AMDAL document and reported the performance every six months.</p> <p>Audit Team Findings: Auditor accepted the comment and company response. There is no issue occurs.</p>
<p>2</p>	<p>Feedbacks: Manpower Agency (Dinas Tenaga Kerja) of Labuhanbatu Selatan Regency</p> <ul style="list-style-type: none"> • PT Umbul Mas Wisesa has complied with the minimum wage payment in accordance with the applicable regulations based on Upah Minimum Kabupaten Labuhanbatu Selatan. • All employees have been registered to the BPJS Ketenagakerjaan programme (social insurance). • There is no report related to the use of female laborers at night or the use of child labor/forced labor by company (The plantation sector is the worst sector against the use of female laborers at night and the use of child labor). • Collective Labour Agreement (PKB) between company and labor union is referred in working regulation. • PT Umbul Mas Wisesa has compiled the organizational structure of P2K3 and has been authorized by Dinas Tenaga Kerja Kabupaten Labuhanbatu Selatan • PT Umbul Mas Wisesa has realized the provision of PPE for its employees but the consistency of the use of PPE by the workers needs to be improved. • PT Umbul Mas Wisesa has conducted periodic health checks for all workers, especially workers who working at hazardous stations including sprayers and fertilizers. • Heavy equipment operators, conveyances, levers, steamers and others have licenses as operators (SIOs). • PT Umbul Mas Wisesa has provided infrastructure that aims to improve the welfare of employees for example, housing, electricity, clean water, health facilities and educational facilities. • Until the audit is conducted, there are no reports related to disputes. <p>Management Responses: PT Umbul Mas Wisesa has been implementing OHS management both in mill and estate according to regulation. HIRADC has been determined and the control of hazard and risk has been implemented and improve each year, The use of PPE has been consistently applied and monitored.</p> <p>Audit Team Findings: Auditor accepted the comment and company response. There is no issue occurs.</p>
<p>3</p>	<p>Feedbacks: Plantation Agency (Dinas Perkebunan) of Labuhanbatu Selatan Regency:</p> <ul style="list-style-type: none"> • PT Umbul Mas Wisesa has performed periodic reporting obligations related to plantation business operations in the form of statistical data of oil palm plantations to Plantation Agency of Labuhanbatu Selatan Regency. • PT Umbul Mas Wisesa has reported the Development of Plantation Business Activity every six month under the report named "Laporan Perkembangan Usaha Perkebunan", includes fire monitoring reports. • Monitoring report on land fires for Semester I and II year 2020 have been reported. <p>Management Responses: Positive Comments.</p> <p>Audit Team Findings: Auditor accepted the comment and company response. There is no issue occurs.</p>
<p>4</p>	<p>Feedbacks: Representative of Tanjung Mulia Village.</p>

	<ul style="list-style-type: none"> • Representative of Tanjung Mulia Village thank to PT Umbul Mas Wisesa against assistance on development of local community • Relationship with the company are doing well, including if any proposing on road maintenance by villagers, there is no rejection from the company. <p>Management Responses:</p> <ul style="list-style-type: none"> • Confirm that there were no land disputes between the company and the villagers of Tanjung Mulia during 2020. • Thank you for declaring that there are no issues regarding environmental pollution caused by the company's operations. <p>Audit Team Findings: Audit team noted the statement from villages and response from PT Umbul Mas Wisesa</p>
<p>5</p>	<p>Feedbacks: Local NGO – Jaringan Pendamping Kebijakan Pembangunan Desa (JPKP) Kabupaten Labuhanbatu Selatan:</p> <ul style="list-style-type: none"> • This NGO is under the guidance of the National Police, in this case it moves to provide assistance in asking for company's aid to the community (CSR) • PT Umbul Mas Wisesa has provided assistance (CSR) especially in terms of road repairs in the village in the form of providing stones and heavy equipment. • PT Umbul Mas Wisesa has provided an opportunity to work in a company for the village community according to their qualifications, • Communication with the community are going well, • During 2020 there were no reports / complaints from the public related to company activities. <p>Management Responses: Positive Comments.</p> <p>Audit Team Findings: Auditor accepted the comment and company response. There is no issue occurs.</p>
<p>6</p>	<p>Feedbacks: Gender Committee and Worker Union</p> <ul style="list-style-type: none"> • PT Umbul Mas Wisesa provided training for Occupational Health and Safety, Personnel Protective Equipment were provided by the company • Clean water was supplied from mill and several workers using wells water. • Calculation of wage was determined by management in accordance with national and local regulation. • No discrimination noted between employees • Other than salary, employees get a ration of rice. • Overall medical expense is covered by the company. • There was no sexual harassment occurs. • Pregnant test for female sprayer was conducted each month for ensuring that there was no pregnant worker doing work with chemicals. • There were no sprayers that in breast-feeding. • PT Umbul Mas Wisesa has given Personal Protective Equipment for employees to do the job, such as: helmets, gloves, masks and safety shoes. <p>Management Responses: Positive Comments.</p> <p>Audit Team Findings: Auditor accepted the comment and company response. There is no issue occurs.</p>

List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
Mr BS (UMW South Estate)	2001	5	Yes	Yes	Has been verified. Comply with terms and conditions of the negotiated and compensation agreement.
Mr IS (UMW North Utara)	2004	10	Yes	Yes	Has been verified. Comply with terms and conditions of the negotiated and compensation agreement.

Previous land owner / user comment	
1	<p>Feedbacks: Mr Berlinsius Damanik (Previous Land Owner UMW South Estate) Prev. crops: Wild bushes and Oil Palm crops Compensation: 2007 Process FPIC: Socialization by the company, Survey/mapping (land measurement based on Land Ownership Statement Letter) and witnessed by borders land owner ("saksi sebatas"), officials of Tanjung Mulia village, representative of District, negotiation with land owner and the payment after successfully agreed by both parties. No forced to release the land from the company, the process is fairly and transparent. Compensated land size: ± 5 Ha. Current location: Block C14, Div. 1, UMW South Estate.</p> <p>Management Responses:</p> <ul style="list-style-type: none"> • Thank you for the confirmation from Mr. Berlinsius Damanik (Previous Land Owner UMW South Estate) who stated that the company conducted a mediation and disseminate program to develop an oil palm plantation. • Thank you for the confirmation from Berlinsius Damanik (Previous Land Owner UMW South Estate) who stated that the community agreed their land for compensation. • Thank you for the confirmation from Mr Berlinsius Damanik (Previous Land Owner UMW South Estate) stating that the land compensation process was not forced, but was given the free option. <p>Audit Team Findings: Audit team noted that land compensation has been made through the process of mediation, dissemination and mapping of cultivated land controlled by the community. Planting compensation are according to the Joint Agreement and the market price applicable. The process of mediation and dissemination and land mapping is carried out at the Village Hall by gathering all villagers who owned land above the company's HGU for an inventory. The process of compensation for land is not forced, but given the option of acquisition.</p>
2	<p>Feedback: Mr. Iwan Sagita AS (Previous Land Owner UMW North Estate) Prev. crops: Wild bushes Compensation: 2008 Process FPIC: Socialization by the company, Survey/mapping (land measurement based on Land Ownership Statement Letter) and witnessed by borders land owner ("saksi sebatas"), officials of Sei Siarti village, representative of District, negotiation with land owner and the payment after successfully agreed by both parties. No forced to release the land from the company, the process is fairly and transparent. Compensated land size: ± 10 Ha. Current location: Block J14-15, Div. 1, UMW North Estate.</p> <p>Management Responses:</p>

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- Thank you for the confirmation from Mr Iwan Sagita AS (Previous Land Owner UMW North Estate) who stated that the company with integrated team conducting mediation and dissemination regarding program to develop an oil palm plantation.
- Thank you for the confirmation from Mr Iwan Sagita AS (Previous Land Owner UMW North Estate) who stated that the compensation process was not forced, but had the right to choose for release.
- Thank you for the confirmation from Mr Iwan Sagita AS (Previous Land Owner UMW North Estate) who stated that there were no complaints or disputes between the community and the company to date, because the company has added contributions to the village.

Audit Team Findings:



Audit team noted that land compensation has been made through the process of mediation, dissemination and mapping of cultivated land controlled by the community. Planting compensation are according to the Joint Agreement and the market price applicable. The process of mediation and dissemination and land mapping is carried out at the Village Hall by gathering all villagers who owned land above the company's HGU for an inventory. The process of compensation for land is not forced, but given the option of acquisition.

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.

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Formal Signing-off of Assessment Conclusion and Recommendation

<p>The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that PT Umbul Mas Wisesa – UMW POM has complied with Indonesia National Interpretation 2020 for RSPO P&C 2018 for the Production of 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 Umbul Mas Wisesa – UMW POM is continued.</p>	
Report prepared by	Acceptance of Assessment Conclusion
Name: Imam Fakhrurozi	Name: Sander Van Den Ende
Company Name: PT BSI Group Indonesia	Company Name: PT Umbul Mas Wisesa - UMW POM
Title: Lead Auditor	Title: Regional Director Sustainability
<p>Signature:</p> 	<p>Signature: <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i></p> 
Date: 5th March 2021	Date: 5th March 2021

Appendix A: Summary of Findings

Criterion / Indicator	Assessment Findings	Compliance	
<p>Principle 1: Behave ethically and transparently Drive ethical business behaviour, build trust and transparency with stakeholders to ensure strong and healthy relationships.</p>			
<p>Criteria 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.</p>			
<p>1.1.1</p>	<p>(C) Management documents that are specified in the RSPO P&C are made publicly available.</p>	<p>Unit of Certification has established and maintained publicly available documents that contains of List of Documents, Number of Documents and Document Date. According to List of Publicly Available Documents PT. Umbul Mas Wisesa year 2020, there are twenty (20) documents are made publicly available, in example as follow:</p> <ol style="list-style-type: none"> 1. Regent Decree related Plantation Permit of PT. Umbul Mas Wisesa No. 503/11/HUKUM/2005. 2. Environmental Impact Assessment (ANDAL) of PT. Umbul Mas Wisesa No. 503.660/268/SET-KOMISI/XII/2008. 3. Domestic Waste Discharge Permit No. 503/0001/DPMPPTSP-LS/IPALD/VII/2019. 4. As per required in document, any Information Request related of these shall ask to Mill/Estate Manager and Mill/Estate Office Assistant. 	<p>Complied</p>
<p>1.1.2</p>	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p>	<p>All the information provided in Bahasa. As mentioned in indicator 1.1.1, the information provided in appropriate languages and accessible to relevant stakeholders. According to list of publicly available document "Dokumen dokumen yang tersedia untuk umum year 2020", such as:</p> <ol style="list-style-type: none"> 1. Regent Decree related Plantation Permit of PT. Umbul Mas Wisesa No. 503/11/HUKUM/2005. 2. Environmental Impact Assessment (ANDAL) of PT. Umbul Mas Wisesa No. 503.660/268/SET-KOMISI/XII/2008. 3. Domestic Waste Discharge Permit No. 503/0001/DPMPPTSP-LS/IPALD/VII/2019. 	<p>Complied</p>

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		4. As per required in document, any Information Request related of these shall ask to Mill/Estate Manager and Mill/Estate Office Assistant.	
1.1.3	(C) Records of requests for information and responses are maintained.	<p>Book of Information Request and its Responses is the system that established by Unit of Certification to record all the information request, including its responses. Sample of information request and its response as follow:</p> <ul style="list-style-type: none"> • 5 May 2020 - Invitation from North Sumatera Governor related Integrated Village Development Program. Respond: 5 May 2020 and attended by representative of company. • 18 June 2020 - Letter No. 560/576/Naker/VI/2020 from Manpower Agency of Labuhanbatu Selatan Regency. Request: Information Data Request of Worker/Labour Union. Respond: 19 June 2020. 	Complied
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.	<p>Unit of Certification has established and maintained procedure of communication and consultation as per mention within Responding to Request for Information (Doc No. ENC-01-11/04-03-2019/Rev.1) dated 18 Mar 2019. This procedure applies to all specific information/data request that are not confidential to the Company requested by relevant stakeholders.</p> <p>The procedure described that:</p> <ul style="list-style-type: none"> • The company provide types of document that can be accessed by public. • The company have a list of stakeholder directly impacted by estate or mill activity. • PIC to give respond on information request are unit manager in coordination with Senior Manager Administration (SMA). • Respond time for information request are 3 days for management unit to communicate to RMO (Regional Management Office), if RMO does not have authority to give respond, then RMO forwarded to Head Office maximum 7 days from receiving request from operation unit. Maximum respond time are 25 days. 	Complied

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		<p>Nominated management official who responsible for communication and consultation is Office Assistant. This assignment is described within Job Description of Office Assistant as essential duties and responsibilities. Nominated person for communication and consultation for each unit, in example: Umbul Mas Wisesa POM: Mr. Heri Setiawan Sirait. Umbul Mas Wisesa South Estate: Mr. Angga Zauhari</p>	
1.1.5	An up-to-date list of contacts and detailed stakeholder information is available along with designated representatives.	<p>Unit of Certification has maintained current list of stakeholders completed with details and nominated representatives of each affected stakeholders. Umbul Mas Wisesa POM: Regency of Labuhanbatu Selatan Government Agencies/Department (8 stakeholders); MUSPIKA/District level (3 stakeholders); Local Communities (5 stakeholders); Labour/Workers Union (9 stakeholders); Contractors (9 stakeholders); Supplier (1 stakeholder). The list is updated in November 2020.</p> <p>Umbul Mas Wisesa North Estate: Regency of Labuhanbatu Government Agencies/Department (8 stakeholders); MUSPIKA/District level (5 stakeholders); Local Communities (1 stakeholders); Labour/Workers Union (9 stakeholders); Supplier (1 stakeholder). The list is updated in December 2020</p>	Complied
Criteria 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.	In general, companies under SIPEF Group have had policy related to Ethical Conduct which have been signed by President Director.	Complied
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.	<p>Unit of Certification has established Mechanism of Ethical Business violation handling is using SOP Whistleblowing System (SOP No. IAD-01-07/29-03-2019/Rev. 0) dated 27 March 2019.</p> <p>According to document verification of complaints and management information, it stated that during 2020 there is no case of Ethical Business violation.</p>	Complied

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		Based on information collected during stakeholder consultation with local government of Labuhan Batu Selatan Regency, local NGO's and community representative (Tanjung Mulia Village) around the certification scope, negative issues or report related ethical business violation is absence.	
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.	<p>Unit of Certification prepared and maintained a list of legal requirement as per describe in "Daftar Peraturan Perundangan Indonesia yang Berkaitan dengan Sistem Sustainability", update 21 Jan 2020.</p> <p>As per Indonesia laws and regulations, mandatory of applicable legal requirement for Plantation Company are Deed of Establishment, Registration on Ministry of Law and Human Rights, Location Permit, Plantation Permit, Land Title and Environmental Impact Assessment or Permit.</p> <p>Umbul Mas Wisesa Palm Oil Mill as certificate holder received FFB's certified from two legal entities. There are Umbul Mas Wisesa North Estate and Umbul Mas Wisesa South Estate (managed by PT. Umbul Mas Wisesa) and Toton Usaha Mandiri Estate (managed by PT. Toton Usaha Mandiri).</p> <p>All the FFB suppliers, including the Mill is complied with legal requirements. The compliances of legal requirement for certificate holder and its supply base as follow:</p> <p><u>PT. Umbul Mas Wisesa</u></p> <ul style="list-style-type: none"> • Changes Deed of Establishment: No. 13 by Notary Lince Hutahayan, SH, dated 19 January 2017. • Registration on Ministry of Law and Human Rights: No.AHU-AH.01.03-0034742, dated 25 January 2017. 	Complied

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		<ul style="list-style-type: none"> • Location Permit: Decree of Labuhan Batu Regent "Surat Keputusan Bupati Labuhan Batu No. 08 tahun 2004", dated 26 May 2004, covering area 8,000 Ha. • Plantation Permit No. 503/11/HUKUM/2005, dated 5 August 2005, ($\pm 8,451$ Ha). • Mill Processing Operation Permit No. 522.2/104/BPPTSU/2/1.3/IX/2014, dated 29 September 2014. Area cover 5.50 Ha and Mill capacity 60 MT per hour. • Land title: HGU Certificate #51 dated 10 June 2013 (2,071.11 Ha); #52 dated 10 June 2013 (4,396.58 Ha); #59 dated 29 September 2014 (679.09 Ha); #60 dated 29 September 2014 (461.90 Ha); #71 dated 5 January 2015 (154.67 Ha). Total certified area based on land title of PT. Umbul Mas Wisesa is 7,763.35 Ha. <p><u>PT. Toton Usaha Mandiri</u></p> <ul style="list-style-type: none"> • Changes Deed of Establishment: No. 23 by Notary Lince Hutahayan, SH, dated 24 July 2019. • Registration on Ministry of Law and Human Rights: No.AHU-AH.01.03-0316804, dated 20 August 2019. • Location Permit: Decree of Labuhan Batu Regent "Surat Keputusan Bupati Labuhan Batu No.7 tahun 2005, dated 8 June 2005, covering area $\pm 1,200$ Ha. • Plantation Permit No.180/172/Huk/2010, dated 5 May 2010 ($\pm 1,200$ Ha). • Land title: HGU Certificate #36 dated 12 May 2011 (1,198.76 Ha). 	
2.1.2	<p>A documented system for ensuring legal compliance is in place. This system has means to track changes to the law and also includes listing and evidence on evaluation of legal compliance of all contracted third parties, such as: recruitment agencies, service provider and labour contractor.</p>	<p>Unit of Certification has established documented system for ensuring legal compliance is in procedure of changing on laws and regulation as per mention in "Prosedur Informasi Perubahan Undang-Undang dan Peraturan Pemerintah" dated 1 November 2011.</p> <p>To tracking for any changes of law and regulation, unit of certification has implement monitoring, evaluation and updating laws and</p>	Complied

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		<p>regulations requirement. In example: document of "Pemantauan Penambahan atau Perubahan Undang-undang/Peraturan Tahun 2019" has monitored and updated in monthly basis.</p> <p>Evidence of legal due diligence on these requirements are implemented in Worker Agreement "Perjanjian Kerja Waktu Tertentu", as follow: Umbul Mas Wisesa POM:</p> <ol style="list-style-type: none"> 1. Mr. F***** M***** (workshop/maintenance), dated 1 July 2019. 2. Mr. F***** A**** (storage), dated 1 September 2019. 3. Mr. W***** (workshop/maintenance), dated 1 November 2019. <p>Within these working contract, legal requirement on manpower regulation has been mentioned in several Article such as Article 4, Article 5, Article 6, Article 7 and Article 8.</p>	
2.1.3	<p>Legal or authorized boundaries are clearly demarcated and visibly maintained and there is no planting beyond these legal or authorized boundaries.</p>	<p>Monitoring of HGU poles in PT. Umbul Mas Wisesa South Estate: Base don field visit to UMW South Estate: Boundary pole HGU No.BPN-RI 145 located near block 07a03, boundary with local community garden, at location 2^o11'46,32"N & 100^o15'23,37"E; Boundary pole HGU No.BPN-RI 146 located near block 07a03, boundary with local community garden, at location 2^o11'46,52"N & 100^o15'29,30"E; Boundary pole HGU No.BPN-RI 147 located near block 07a03, boundary with local community garden, at location 2^o11'46,50"N & 100^o15'37,63"E;</p> <p>Based on map for HGU boundary poles: In UMW South Estate comprise of more than 120 boundary poles: sampled "Pemeriksaan Nomor Patok HGU Periode 16 November 2019" for HGU boundary poles No.109, 110, 111, 112, 113, 114, 116, 234, 235, 236, 237, 211, 199, 200, 201, 203, 204, 205, 205, 206, 207, 208, 209, 210, 167 – all in good condition.</p>	Complied

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		<p>Repair/maintenance minutes "Berita Acara Perawatan patok HGU" dated 18 January 2020 for boundary poles No.BPN-RI 004 and BPN-RI 007; in block A14.</p> <p>UMW North Estate: "Pemeriksaan Nomor Patok HGU Periode Januari 2020" for 94 HGU boundary poles in all division. There is no broken boundary poles. "Pemeriksaan Nomor Patok HGU Januari 2020 – Division 2" for HGU boundary poles No.85, 86, 87, 88, 89, 90, 91, 92, 93, 93, 95, 96, 97, 98, 99, 100, 101, 102, 103, 104, 105, 106, 107, 222, 223, 224, 225, 226, 227, 228, 229 – all in good condition. "Pemeriksaan Nomor Patok HGU Januari 2020 – Division 3" for HGU boundary poles No.53, 54, 55, 56, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 171, 172, 173, 174, 175, 176, 177, 178, 179 – all in good condition.</p> <p>TUM Estate: "Pemeriksaan Nomor Patok HGU TUM Periode Desember 2019" for 33 HGU boundary poles in all division. There is no broken boundary poles. "Form Pemeriksaan Patok HGU Desember 2019 – Division 3" and the previous period for HGU boundary poles No.1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33 field verification on 10 & 16 December 2019 – all in good condition.</p>	
Criteria 2.2: All contractors providing operational services and supplying labour, and		Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.	
2.2.1	A list of contracted parties is available.	PT. Umbul Mas Wisesa maintains list of all contracted parties. UMW North Estate, there are 6 contractors: CV Tua Gabe (road stoning, road upkeep, drainage upkeep, security drain development, site levelling for housing), CV Prima (bridge construction), CV Andini Surya Elektrik (electricity connection 1300 watt), CV Bina Teknik (purchase 2 unit	Complied

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		<p>truck's box), PT. Rimba Arya Tara (construction of 7 unit house) and UD. Juir (FFB transport).</p> <p>In UMW South Estate, there are 3 contractors: CV Tua Gabe (FFB transport), CV Prima (civil work) and Koperasi Jasa Karyawan (manpower).</p> <p>Unit of Certification has a contractor registers in each unit (mill and estates).</p> <p>Sample of UMWS Estate and POM: List of third-party contractors "Daftar Stakeholders Tahun 2021", dated 4 January 2021. There are 5 third party contractors are engaged by UMWS Estate.</p>	
2.2.2	<p>All contract, including those for FFB supply, contain specific clause on meeting relevant legal requirements and this can be demonstrated by the third party.</p>	<p>UMW POM: "Surat Perjanjian Kerja No.01/RMO-UMWN/JR/I/2020 antara PT. Umbul Mas Wisesa dengan UD. Juir tentang Angkutan FFB" dated 2 January 2020. Chapter 5 stipulated: "<i>Pihak kedua wajib mendukung pelaksanaan ketat hokum dan peraturan Pemerintah Republik Indonesia ...</i>" – Contractor shall support and uphold rules and regulation of Republic of Indonesia. The contractor demonstrates obedience in the payment of income tax (PPh 23): "Bukti Pemotongan PPh Pasal 23 UD.Juir" period April 2019 of Rp.1,047,785; "Bukti Pemotongan PPh Pasal 23 UD.Juir" period May 2019 of Rp.1,677,316; "Bukti Pemotongan PPh Pasal 23 UD.Juir" period June 2019 of Rp.2,136,394; "Bukti Pemotongan PPh Pasal 23 UD.Juir" period October 2019 of Rp.2,674,063; "Bukti Pemotongan PPh Pasal 23 UD.Juir" period November 2019 of Rp.2,219,386;</p>	Complied

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		<p>"Perjanjian Kemitraan Usaha tentang Jual Beli Tandan Buah Segar Kelapa Sawit" between PT. Umbul Mas Wisesa and Koperasi Serba Usaha Suka Makmur, dated 1 November 2017. Chapter 12 verse 1 stipulated: "<i>Pengurus Koperasi dan masing-masing anggota koperasi bersedia sepenuhnya tanpa kecuali untuk melaksanakan dan mematuhi syarat dan ketentuan yang ditetapkan oleh perundang-undangan dan peraturan terkait lainnya dalam rangka perolehan sertifikasi RSPO, ISPO, dan/atau ISCC (penanaman kelapa sawit berkelanjutan) atas petunjuk dan pengarahannya UMW.</i>"</p> <p>UMW South Estate: "Surat Perjanjian Kerja No.01/RMO-UMWS/TG/I/2020 antara PT. Umbul Mas Wisesa dengan CV Tua Gabe tentang Angkut FFB" dated 2 January 2020. Chapter 5 verse 7 stipulated: "<i>Pihak kedua wajib mendukung pelaksanaan ketat hukum dan peraturan pemerintah Republik Indonesia.</i>" – contractor shall support and uphold rules and regulation of Republic of Indonesia.</p> <p>TUM Estate: "Surat Perjanjian No.01/TUM-HO/EDM/2019 antara PT. Toton Usaha Mandiri dengan PT. Rimba Arya Tara tentang 1 lot Pembangunan 9 (Sembilan) unit Rumah Pekerja Permanen tipe 100 Lengkap Septictank dan Filter Garden di Toton Usaha Mandiri Estate" dated 22 February 2019. Chapter 7 verse 3 stipulated: "<i>Pihak kedua wajib mematuhi dan bertanggungjawab ... sesuai dengan yang ditentukan dan diatur dalam Undang-undang yang berlaku di Indonesia.</i>" – contractor shall comply and responsible against rules and regulation of Republic of Indonesia. Contractor participated in toolbox meeting dated 14 October 2019 – 36 contractor workers attended (stone mason, welding, plumbing, civil construction) – no worker under 18 years old.</p>	
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		<p>Unit of Certification has a contract registers in each unit (mill and estates). Sample taken for Umbul Mas Wisesa North & South Estate and Toton Usaha Mandiri Estate, as below:</p> <ul style="list-style-type: none"> • "Surat Perjanjian Kerja" No.01/RMO-UMWS/TG/I/2021 dated 2 January 2021 between PT. Umbul Mas Wisesa and CV. Tua Gabe, a FFB transport enterprise located at Labuhanbatu Selatan Regency. (UMWS Estate). • "Surat Perjanjian Kerja" No.03/RMO-UMWN/TG/VII/2020 dated 1 July 2020 between PT. Umbul Mas Wisesa and CV. Tua Gabe, one of heavy vehicle enterprise related beam bridges and road maintenance, located Medan. (UMWN Estate) • "Surat Perjanjian" No.01/TUM-HO/ENG/2020 dated 30 January 2020 between PT. Umbul Mas Wisesa and CV. Sibirurang 71, one of wastewater treatment contractor, located Sub-Village of Sidomulyo, Village of Tanjung Mulia. (TUM Estate) <p>According to the sample of evidence provides, third-party agreement already containing specific clause on meeting applicable legal requirement.</p>	
2.2.3	All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour.	<p>UMW POM: "Perjanjian Kemitraan Usaha tentang Jual Beli Tandan Buah Segar Kelapa Sawit" between PT. Umbul Mas Wisesa and Koperasi Serba Usaha Suka Makmur, dated 1 November 2017. Chapter 12 verse 1 stipulated: "<i>Pengurus Koperasi dan masing-masing anggota koperasi bersedia sepenuhnya tanpa kecuali untuk melaksanakan dan mematuhi syarat dan ketentuan yang ditetapkan oleh perundang-undangan dan atau peraturan terkait lainnya dalam rangka perolehan sertifikasi RSPO, ISPO, dan/atau ISCC (penanaman kelapa sawit berkelanjutan) atas petunjuk dan pengarahan UMW.</i>" – Cooperative committee and each member committed to implement and comply with requirement from applicable laws and regulation for</p>	Complied

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		<p>sustainable oil palm: RSPO, ISPO and/or ISCC certification, as guided by Umbul Mas Wisesa.</p> <p>UMW South Estate: "Surat Perjanjian Kerja No.01/RMO-UMWS/TG/I/2020 antara PT. Umbul Mas Wisesa dengan CV Tua Gabe tentang Angkut FFB" dated 2 January 2020. Chapter 5 verse 3 stipulated: <i>"Mematuhi kebijakan perusahaan, khususnya dalam hal kebijakan pekerja pada anak, Pihak Kedua tidak mempekerjakan anak di bawah 18 tahun dan pekerja yang berasal dari perdagangan manusia."</i> – to obey company regulation, specifically policy related to no child worker. The contractor will not employ worker under 18 years old and/or worker from human trafficking victim.</p> <p>Chapter 5 verse 8 stipulated: <i>"Pihak kedua dilarang keras melakukan praktek pekerja paksa dan mempekerjakan pekerja dari perdagangan manusia."</i> – Contractor is prohibited from force labor and employs human trafficking victim.</p> <p>UMW North Estate: "Surat Perjanjian Kerja No.01/RMO-UMWN/JR/I/2020 antara PT. Umbul Mas Wisesa dengan UD. Juir tentang Angkutan FFB" dated 2 January 2020. Chapter 5 verse 3 stipulated: <i>"Mematuhi kebijakan perusahaan, khususnya dalam hal kebijakan pekerja pada anak, Pihak Kedua tidak mempekerjakan anak di bawah 18 tahun dan pekerja paksa."</i> – to obey company regulation, specifically policy related to no child worker. The contractor will not employ worker under 18 years old and/or worker from human trafficking victim.</p> <p>TUM Estate: "Surat Perjanjian No.01/TUM-HO/EDM/2019 antara PT. Toton Usaha Mandiri dengan PT. Rimba Arya Tara tentang 1 lot Pembangunan 9</p>	
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		<p>(Sembilan) unit Rumah Pekerja Permanen tipe 100 Lengkap Septictank dan Filter Garden di Toton Usaha Mandiri Estate” dated 22 February 2019. Chapter 7 verse 4 stipulated: “<i>Pihak kedua menjamin tidak akan mempekerjakan anak usia di bawah 18 tahun dan setiap pekerja mendapatkan upah kerja sekurang-kurangnya sesuai dengan upah minimum...</i>” – contractor guarantee not to employ children under 18 years old and all worker shall get minimum wage.</p> <p>Contractor participated in toolbox meeting dated 14 October 2019 – 36 contractor workers attended (stone mason, welding, plumbing, civil construction) – no worker under 18 years old.</p> <p>Unit of Certification has a contract registers in each unit (mill and estates). Sample taken for Umbul Mas Wisesa North & South Estate and Toton Usaha Mandiri Estate, as below:</p> <ul style="list-style-type: none"> • “Surat Perjanjian Kerja” No.01/RMO-UMWS/TG/I/2021 dated 2 January 2021 between PT. Umbul Mas Wisesa and CV. Tua Gabe, a FFB transport enterprise located at Labuhanbatu Selatan Regency. (UMWS Estate). • “Surat Perjanjian Kerja” No.03/RMO-UMWN/TG/VII/2020 dated 1 July 2020 between PT. Umbul Mas Wisesa and CV. Tua Gabe, one of heavy vehicle enterprise related beam bridges and road maintenance, located Medan. (UMWN Estate) • “Surat Perjanjian” No.01/TUM-HO/ENG/2020 dated 30 January 2020 between PT. Umbul Mas Wisesa and CV. Sibinurang 71, one of wastewater treatment contractor, located Sub-Village of Sidomulyo, Village of Tanjung Mulia. (TUM Estate) <p>According to the sample of evidence provides, third-party agreement already containing clauses disallowing child, forced and trafficked labor.</p>	
<p>Criteria 2.3: All FFB supplies from outside the unit of certification are from legal sources.</p>			
2.3.1	<p>(C) For all directly sourced FFB, Palm Oil Mill (POM) requires:</p> <ul style="list-style-type: none"> • Information regarding the geolocation of FFB origins; 	<p>PT. Umbul Mas Wisesa directly source FFB from independent smallholder (RSPO certificate No.RSPO 687965).</p>	Complied

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<ul style="list-style-type: none"> • 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. 		<p><u>Geo location:</u> Sukoharjo Hamlet, Tanjung Mulia Village, Kampung Rakyat District, Labuhanbatu Selatan Regency, Sumatera Utara Province, Indonesia. GPS coordinate: 02°11' 29.00" N and 100° 19' 57.89" E.</p> <p><u>Proof of Ownership:</u> Sample seen:</p> <ul style="list-style-type: none"> – SHM No.2545, dated 17th November 2016 under name Mr Taslim, area 16,999 m² issued by "Kantor Pertanahan Kabupaten Kota Labuhanbatu", and completed with map indicating the land parcel. – SHM No.2511 dated 17th November 2016 under name Mr Mustomo, area 16,991 m² issued by "Kantor Pertanahan Kabupaten Kota Labuhanbatu", and completed with map. – SHM No 2516 dated 17th November 2016 under name Mr Muhammad Hidayat, area 16,984 m² issued by "Kantor Pertanahan Kabupaten Kota Labuhanbatu", and completed with map indicating the land parcel. – SKT No.593/1942/TML/2009, dated 29th August 2009, under name Mrs.Tri Yuli Wardani, area 20,000 m². Issued by "Kepala Desa Tanjung Mulia" and completed with map indicating the land parcel; – SKGR dated 16th August 2010 under name Mr.Victor H Girsang, area 19,923 m². Issued by "Kepala Desa Tanjung Mulia" and completed with map indicating the land parcel; – Surat Ukur No.605/TanjungMulia/2016 dated 7th November 2016 under name Mr Marsani Nasution, area 16,667 m² issued by "Kantor Pertanahan Kabupaten Kota Labuhanbatu", and completed with map indicating the land parcel. <p><u>Valid trading license:</u> Registration as legal entity as per "Surat Menteri Negara Koperasi dan Usaha Kecil dan Menengah Republik Indonesia Kepala Dinas Perindustrian, Perdagangan, Koperasi dan UKM Kabupaten Labuhanbatu</p>	
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		<p>Selatan No.518/65/BH/Indagkop/IV/2016 tentang Pengesahan Akta Pendirian Koperasi Serba Usaha Suka Makmur” signed by regent of Labuhanbatu Selatan, dated 15 February 2016.</p> <p>Umbul Mas Wisesa POM receives all FFB’s from its own Estates and Certified Independent Smallholder. There is no changes of supply base to this Mill. All relevant supply bases are attached in RSPO certificate of Umbul Mas Wisesa POM.</p> <p>Geolocation of FFB supply bases that supplied to UMW POM are:</p> <ol style="list-style-type: none"> 1. UMWS Estate 2° 13’ 10.17” N; 100° 17’ 10.00” E 2. UMWN Estate 2° 16’ 41.57” N; 100° 17’ 36.83” E 3. TUM Estate 2° 16’ 41.57” N; 100° 17’ 36.83” E 4. KSU Suka Makmur 2° 11’ 29.91” N; 100° 19’ 59.26” E 	
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.	<p>PT. Umbul Mas Wisesa – UMW POM does not have indirect FFB source. All supply of FFB comes from certified supply base.</p> <p>PT. Umbul Mas Wisesa POM and its supply base does not use FFB collection centers, agents or other intermediaries. This UoC implementing Identity Preserved as supply chain system. Not applicable</p>	Complied
<p>Principle 3: Optimise productivity, efficiency, positive impact and resilience Implement plans, procedures and systems for continuous improvement.</p>			
<p>Criteria 3.1: There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.</p>			
3.1.1	(C) A business or management plan (minimum of three years) is documented and where applicable, includes a jointly developed business case for Scheme Smallholders.	<p>PT Umbul Mas Wisesa has prepared a business plan for period 2019 – 2026. The business plan indicates the projected production of FFB, CPO and PK; cost of production, revenue and profit estimation. This projection include FFB receiving from the supply base of PT Toton Usaha Mandiri Estate and Smallholders (KSU).</p> <p>PT Umbul Mas Wisesa demonstrated independent financial audit report for from Registered Public Accountants Imelda & Partner (License No.308/KM.1/2020) as evidence in Independent Auditor’s Report</p>	Complied

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		<p>No.00398/2.1265/AU.1/01/1208-1/1/VI/2020 dated 22 June 2020 by Theodorus Bambang Dwi K. A. (Public Accountant License No. AP.1208). Based on the report, the accompanying financial statements presents fairly, in all material respects, the financial position of PT Umbul Mas Wisesa as of December 31st, 2019 and its financial performance and cash flows for the year then ended in accordance with Indonesian Financial Accounting Standards. Financial audit for financial year 2020 has been done in January 2020, the report is still in progress by the public accountant.</p> <p>PT Toton Usaha Mandiri demonstrated independent financial audit report for from Registered Public Accountants Imelda & Partner (License No.308/KM.1/2020) as evidence in Independent Auditor’s Report No.00364/2.1265/AU.1/01/1208-1/1/VI/2020 dated 8 June 2020 by Theodorus Bambang Dwi K. A. (Public Accountant License No. AP.1208). Based on the report, the accompanying financial statements presents fairly, in all material respects, the financial position of PT Toton Usaha Mandiri as of December 31st, 2019 and its financial performance and cash flows for the year then ended in accordance with Indonesian Financial Accounting Standards.</p> <p>Available evidence of tax receipt dated 9 Nov 2020; billing code 124607576593068; NPWP 017908153116001 of PT Umbul Mas Wisesa; tax object number 120511011611000261; PPB perkebunan (land tax) period January – December 2020 for land 52,291,900 m² and building 15,690 m²; amount IDR *,***,**,645. Available evidence of tax receipt dated 9 Nov 2020; billing code 124607576173093; NPWP 017908153116001 of PT Umbul Mas Wisesa; tax object number 122503011611000521; PPB perkebunan (land tax) period January – December 2020 for land 25,459,200 m² and building 52,810 m²; amount IDR *,***,**,968.</p> <p>UMW POM: company has business plan for period 2019-2026 including FFB receiving and processing.</p>	
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		<p>Sampled "Business Plan of FFB, CPO/PK, and Processing Cost 2019 – 2026":</p> <p>FFB</p> <table border="1"> <thead> <tr> <th>Year</th> <th>UMW South (Ton)</th> <th>UMW North (Ton)</th> <th>TUM Estate (Ton)</th> <th>Out-grower (Ton)</th> </tr> </thead> <tbody> <tr><td>2019</td><td>122,617</td><td>72,215</td><td>30,644</td><td>1,500</td></tr> <tr><td>2020</td><td>126,165</td><td>73,629</td><td>30,644</td><td>1,575</td></tr> <tr><td>2021</td><td>123,388</td><td>74,966</td><td>30,644</td><td>1,654</td></tr> <tr><td>2022</td><td>117,945</td><td>74,415</td><td>30,466</td><td>1,736</td></tr> <tr><td>2023</td><td>111,549</td><td>71,656</td><td>30,248</td><td>1,823</td></tr> <tr><td>2024</td><td>106,914</td><td>67,263</td><td>30,159</td><td>1,914</td></tr> <tr><td>2025</td><td>103,572</td><td>65,565</td><td>29,015</td><td>2,010</td></tr> <tr><td>2026</td><td>102,090</td><td>65,035</td><td>28,043</td><td>2,111</td></tr> </tbody> </table> <p>CPO:</p> <table border="1"> <thead> <tr> <th>Year</th> <th>UMW (Ton)</th> <th>TUM Estate (Ton)</th> <th>Out-grower (Ton)</th> </tr> </thead> <tbody> <tr><td>2019</td><td>48,674</td><td>7,048</td><td>345</td></tr> <tr><td>2020</td><td>49,844</td><td>7,048</td><td>362</td></tr> <tr><td>2021</td><td>49,481</td><td>7,048</td><td>380</td></tr> <tr><td>2022</td><td>47,894</td><td>7,007</td><td>399</td></tr> <tr><td>2023</td><td>45,656</td><td>6,957</td><td>419</td></tr> <tr><td>2024</td><td>43,405</td><td>6,937</td><td>440</td></tr> <tr><td>2025</td><td>42,114</td><td>6,673</td><td>462</td></tr> <tr><td>2026</td><td>41,550</td><td>6,450</td><td>485</td></tr> </tbody> </table> <p>PK:</p> <table border="1"> <thead> <tr> <th>Year</th> <th>UMW (Ton)</th> <th>TUM Estate (Ton)</th> <th>Out-grower (Ton)</th> </tr> </thead> <tbody> <tr><td>2019</td><td>10,607</td><td>1,011</td><td>53</td></tr> <tr><td>2020</td><td>10,851</td><td>1,011</td><td>55</td></tr> </tbody> </table>	Year	UMW South (Ton)	UMW North (Ton)	TUM Estate (Ton)	Out-grower (Ton)	2019	122,617	72,215	30,644	1,500	2020	126,165	73,629	30,644	1,575	2021	123,388	74,966	30,644	1,654	2022	117,945	74,415	30,466	1,736	2023	111,549	71,656	30,248	1,823	2024	106,914	67,263	30,159	1,914	2025	103,572	65,565	29,015	2,010	2026	102,090	65,035	28,043	2,111	Year	UMW (Ton)	TUM Estate (Ton)	Out-grower (Ton)	2019	48,674	7,048	345	2020	49,844	7,048	362	2021	49,481	7,048	380	2022	47,894	7,007	399	2023	45,656	6,957	419	2024	43,405	6,937	440	2025	42,114	6,673	462	2026	41,550	6,450	485	Year	UMW (Ton)	TUM Estate (Ton)	Out-grower (Ton)	2019	10,607	1,011	53	2020	10,851	1,011	55	
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		<table border="1"> <tr><td>2021</td><td>10,775</td><td>1,011</td><td>58</td></tr> <tr><td>2022</td><td>10,441</td><td>1,005</td><td>61</td></tr> <tr><td>2023</td><td>9,971</td><td>998</td><td>64</td></tr> <tr><td>2024</td><td>9,500</td><td>995</td><td>67</td></tr> <tr><td>2025</td><td>9,214</td><td>957</td><td>70</td></tr> <tr><td>2026</td><td>9,082</td><td>925</td><td>74</td></tr> </table> <p>Total:</p> <table border="1"> <thead> <tr> <th>Year</th> <th>FFB (Ton)</th> <th>CPO (Ton)</th> <th>PK (Ton)</th> <th>OER (%)</th> <th>KER (%)</th> </tr> </thead> <tbody> <tr><td>2019</td><td>226,976</td><td>56,067</td><td>11,671</td><td>24.00</td><td>5.00</td></tr> <tr><td>2020</td><td>232,013</td><td>57,254</td><td>11,917</td><td>24.00</td><td>5.00</td></tr> <tr><td>2021</td><td>230,652</td><td>56,909</td><td>11,844</td><td>24.00</td><td>5.00</td></tr> <tr><td>2022</td><td>215,407</td><td>55,300</td><td>11,507</td><td>24.00</td><td>5.00</td></tr> <tr><td>2023</td><td>215,276</td><td>53,032</td><td>11,033</td><td>24.00</td><td>5.00</td></tr> <tr><td>2024</td><td>206,250</td><td>50,782</td><td>10,562</td><td>24.00</td><td>5.00</td></tr> <tr><td>2025</td><td>200,162</td><td>43,243</td><td>10,241</td><td>24.00</td><td>5.00</td></tr> <tr><td>2026</td><td>197,279</td><td>48,485</td><td>10,081</td><td>24.00</td><td>5.00</td></tr> </tbody> </table>	2021	10,775	1,011	58	2022	10,441	1,005	61	2023	9,971	998	64	2024	9,500	995	67	2025	9,214	957	70	2026	9,082	925	74	Year	FFB (Ton)	CPO (Ton)	PK (Ton)	OER (%)	KER (%)	2019	226,976	56,067	11,671	24.00	5.00	2020	232,013	57,254	11,917	24.00	5.00	2021	230,652	56,909	11,844	24.00	5.00	2022	215,407	55,300	11,507	24.00	5.00	2023	215,276	53,032	11,033	24.00	5.00	2024	206,250	50,782	10,562	24.00	5.00	2025	200,162	43,243	10,241	24.00	5.00	2026	197,279	48,485	10,081	24.00	5.00	
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3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available.	<p>The unit of certification has provided replanting program up to year 2030. There is no replanting program for next 5 years in UMW South Estate. The oldest plant in UMW South Estate was 2005 plantation, therefore replanting will be start in 2027.</p> <p>Replanting Program of UMW South Estate:</p> <table border="1"> <thead> <tr> <th>Year</th> <th>Replanting (Ha)</th> </tr> </thead> <tbody> <tr><td>2027</td><td>237.12</td></tr> <tr><td>2028</td><td>302.00</td></tr> <tr><td>2029</td><td>567.64</td></tr> <tr><td>2030</td><td>607.96</td></tr> </tbody> </table> <p>Replanting Program of UMW North Estate will be starts in 2031:</p>	Year	Replanting (Ha)	2027	237.12	2028	302.00	2029	567.64	2030	607.96	Complied																																																																				
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3.1.3	The unit of certification holds management review at planned term according to the scale and nature of the activities undertaken.	<p>Replanting Program of TUM Estate:</p> <table border="1"> <thead> <tr> <th>Year</th> <th>Replanting (Ha)</th> </tr> </thead> <tbody> <tr><td>2028</td><td>153.45</td></tr> <tr><td>2029</td><td>152.87</td></tr> <tr><td>2030</td><td>151.48</td></tr> </tbody> </table> <p>Review of replanting progress will be conducted annually during management review.</p>	Year	Replanting (Ha)	2028	153.45	2029	152.87	2030	151.48	Each unit conducted Management Review. Latest Management Review in UMW POM conducted on 14 Jan 2021. Management review has discussed: <ul style="list-style-type: none"> Results of internal audits; internal audit in UMW POM conducted on 23 Nov to 5 Dec 2020 and 20-23 Dec 2020, by ENC RMO NS Team, summary of finding and corrective action have been documented in Visit Report ENC Team. 	Complied																		
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		<ul style="list-style-type: none"> • Customer feedback; Based on review of customer feedback conducted by Marketing Department, there is no complaint related CPO and PK quality sold by UMW POM. • Process performance and product conformity. FFB processed in UMW POM are coming from owned estates and neighbouring company under the same management (PT TUM), also from smallholder which is RSPO certified under certificate number RSPO 687965 (KSU Suka Makmur). • Status of preventive and corrective actions. All finding discussed in this Management Review have been closed and attached in the minutes of management review. • Follow-up actions from management reviews. Result of previous management review were always discussed, mostly regarding performance, target achievement and FFB quality. • Changes that could affect the management system. There is SOP revision related Supply Chain, Supply Chain and Traceability of Palm Product, previously ENC's SOP become Marketing's SOP (MKT-03-06); revision of SOP Customer Handling (MKT-03-02/04-12-2020/Rev.2). • Recommendations for improvement. Carried out all recommendation from internal audit. <p>Latest Management Review in UMW South Estate conducted on 28 Dec 2020. Management review has discussed:</p> <ul style="list-style-type: none"> • Results of internal audits; internal audit in UMWS Estate conducted on 23 to 28 Nov 2020, by ENC RMO NS Team, summary of finding and corrective action have been documented in Visit Report ENC Team. • Customer feedback; there are customer feedback received from UMW POM related FFB quality. • Process performance and product conformity. Process of upkeep and harvesting following Oil Palm Agriculture Part 1 and Part 2; FFB 	
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		<p>quality following the SOP of Engineering Department, Manual Laboratory Independent, FFB grading procedure (Lab-01-10/11-08-2020/Rev.4).</p> <ul style="list-style-type: none"> • Status of preventive and corrective actions have been discussed. Preventive and corrective action against the internal audit findings. • Follow-up actions from management reviews; recommendation from previous management review have been implemented. • Changes that could affect the management system. There is no change that could effect the management system. • Recommendations for improvement; regularly carried out updating records related to fulfilment of sustainability requirements. <p>Latest Management Review in UMW North Estate and TUM Estate conducted on 23-24 Dec 2020. Management review has discussed:</p> <ul style="list-style-type: none"> • Results of internal audits; internal audit in UMWN Estate and TUM Estate conducted on 16-21 Nov 2020, by ENC RMO NS Team. Summary of finding and corrective action have been documented in Visit Report ENC Team. • Customer feedback; there are customer feedback received from UMW POM related FFB quality. • Process performance and product conformity. Process of upkeep and harvesting following Oil Palm Agriculture Part 1 and Part 2; FFB quality following the SOP of Engineering Department, Manual Laboratory Independent, FFB grading procedure (Lab-01-10/15-02-2019/Rev.2). • Status of preventive and corrective actions. Preventive and corrective action against the internal audit findings. • Follow-up actions from management reviews; recommendation from previous management review have been implemented. • Changes that could affect the management system. There is no change that could effect the management system. 	
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		<ul style="list-style-type: none"> Recommendations for improvement; regularly carried out updating records related to fulfilment of sustainability requirements. 	
Criteria 3.2: The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.			
3.2.1	<p>(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impact and opportunities of the unit of certification.</p>	<p>Available internal audit report UMW POM that conducted on 20 – 23 Dec 2020. Findings have been recorded, and action plan have been determined.</p> <p>UMW POM has continual improvement program in environment aspect, such as the development of implementation of EFB to Biocoal process for PT Umbul Mas Wisesa at Umbul Mas Wisesa Oil Mill in Desa Tanjung Mulia, North Sumatera. The program evident in Contract Agreement No.19/UMWM-HO/EDM/2019 dated 22 Nov 2019, between PT Umbul Mas Wisesa and S.E.E. Performance Engineering BVBA. In social aspect UMW POM has done joint exercise (<i>senam pagi</i>) to improve employees health.</p> <p>Continuous improvement by UMW POM based on VPE (Vice President Engineering) visit on 9 Jul 2019:</p> <ol style="list-style-type: none"> The FFB from the front FFB conveyor at the loading ramp is dropping the FFB down into the next conveyor, which is damaging the fruit and also the conveyor. The Mill should install a chute to the bottom of the conveyor, so the fruit slides into the conveyor rather than dropping. The drive chain for the incline SFB conveyor has no tensioner sprocket, so the chain jumps teeth on the sprocket, when the conveyor is under load. The Mill should immediately install a tensioner otherwise the drive sprockets will be damaged. <p>Due to Covid-19 pandemic, there is no VPE visit in 2020.</p> <p>Internal audit in UMW South Estate has been conducted on 23 – 28 Nov 2020. Findings have been recorded, action plan have been determined</p>	Complied

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		<p>and implemented. Continuous improvement by UMWS Estate based on SEM (Senior Estate Manager) visit on 14 Jan 2021.</p> <p>Internal audit in UMW North Estate and TUM Estate has been conducted on 16-21 Nov 2020. Findings have been recorded, action plan have been determined and implemented. Continuous improvement by UMWN Estate and TUM Estate based on SEM (Senior Estate Manager) visit on 15 Jan 2021.</p> <p>Continual Improvement recorded by UMWN and TUM Estate are related to control of nettle caterpillar, e.g. imago trap and application of Cordyceps. Based on continual improvement record, UMWN Estate has installed 47 unit of imago trap, with result 28130 imago collected; TUM Estate has installed 67 unit of imago trap, with result 47,274 imago collected. Application of Cordyceps in UMWN Estate recorded 12,150 cc in November; in TUM Estate recorded 12,450 cc. Area of application is Block K16A, J13, J14, J15, J15A, K15A and L05.</p>	
3.2.2	As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat by Certification Body during Annual Surveillance Assessment by using the RSPO metrics template.	The company has reported Annual Communication of Progress (ACOP) 2019 to RSPO website under organization name SIPEF Group, membership number 1-0021-05-000-00. Based on the report, number of management units certified under RSPO P&C Certification are 9 units; total certified area 97,018 Ha. Scheme Smallholder FFB volume supplied that is certified are 243,571 tonnes. Total CSPO sold as RSPO-certified are 261,374 tonnes; CSPO sold under other certification schemes are 63,399 tonnes; CSPO sold as conventional are 12,880 tonnes; total CSPO are 337,653 tonnes. CSPK sold under RSPO certified are 53,902 tonnes; total CSPK are 53,902 tonnes.	Complied
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.	<p>There is no changes in their procedures for Agronomy, Mill and Sustainability.</p> <p>Estate:</p> <p>The procedures documented in "Oil Palm Agricultural Manual" (revised April 2019), where it contains all sub section of the process, such as: Nursery, land clearing, planting in peat soil and mineral soil with zero</p>	Complied

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		<p>burning, planting legume cover crops, terracing, upkeep (fertilizer and pesticides, included safe working practices), water level management, riparian and watercourse management, harvesting, replanting and FFB transport. Documented SOP are as follows:</p> <ol style="list-style-type: none"> 1. OPM-01-00; dated 02/10/2017; Biology of Oil Palm. 2. OPM-02-00; dated 02/10/2017; General Information: Oil Palm Nursery. 3. OPM-02-01; dated 02/10/2017; Land Preparation of Oil Palm Nursery – Persiapan Lahan Pembibitan Kelapa Sawit 4. OPM-02-02; dated 02/10/2017; Oil Palm Pre Nursery – Pre Nursery Kelapa Sawit. 5. OPM-02-03; dated 02/10/2017; Oil Palm Main Nursery – Main Nursery Kelapa Sawit. 6. OPM-03-01; dated 02/10/2017; Survey and Mapping – Survey dan Pemetaan. 7. OPM-03-02; dated 02/10/2017; Land Clearing – Pembersihan Lahan. 8. OPM-03-03; dated 06/02/2019; Land Preparation – Persiapan Lahan. 9. OPM-03-04; dated 02/10/2017; Legume Cover Crop <i>Mucuna brachteata</i> – <i>Mucuna brachteata</i> Kacangan Penutup Tanah. 10. OPM-03-05; dated 02/10/2017; Field Planting – Penanaman ke Lapangan. 11. OPM-04-01; dated 02/10/2017; Palm Supplying – Penyisipan Tanaman. 12. OPM-04-02; dated 02/10/2017; Thinning Out and Removing Plant – Penjarangan dan pembongkaran Tanaman. 13. OPM-05-01; dated 06/02/2019; Ablation and Sanitation – Ablasi dan Sanitasi. 14. OPM-05-02; dated 06/02/2019; Harvesting – Panen. 15. OPM-05-03; dated 06/02/2019; FFB and LF Delivery – Pengiriman TBS dan Berondolan. 	
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		<ol style="list-style-type: none"> 16. OPM-05-04; dated 02/10/2017; Frond Pruning – Pemangkasan Pelepah. 17. OPM-05-05; dated 16/02/2019; Black Bunch Count – Sensus Buah. 18. OPM-05-06; dated 02/10/2017; <i>Elaeobius camerunicus</i> Management – Pengelolaan <i>Elaeobius camerunicus</i>. 19. OPM-06-01; dated 02/10/2017; Inorganic Fertiliser – Pupuk Inorganik. 20. OPM-06-02; dated 02/10/2017; Organic Fertiliser – Pupuk Organik 21. OPM-06-03; dated 02/10/2017; LSU: Palm Marking – LSU: Penandaan Tanaman. 22. OPM-06-04; dated 02/10/2017; Leaf Sampling Unit (LSU) and Rachis Sampling Unit (RSU) – Pengambilan Sampel. 23. OPM-07-01; dated 06/02/2019; Detection and Censu – Deteksi dan Sensus. 24. OPM-07-02; dated 02/10/2017; Pest Control – Pengendalian Hama. 25. OPM-07-03; dated 02/10/2017; Disease Control – Pengendalian Penyakit. 26. OPM-07-04; dated 02/10/2017; Integrated Pest Management – Pengendalian Hama Terpadu. 27. OPM-08-01; dated 06/02/2019; Weed Control – Pengendalian Gulma. 28. OPM-09-01; dated 19/03/2019; Water management in Coastal Soil – Pengelolaan Air di Tanah Pesisir. 29. OPM-09-02; dated 02/10/2017; Management of Riparian Area – Pengelolaan Riparian Area. 30. OPM-09-03; dated 01/04/2019; The Use, Store and Discrad Pesticide – Penggunaan, Penyimpanan dan pemusnahan pestisida. 31. OPM-10-01; dated 06/02/2019; Field Quality Control. <p>Interviews with the employees indicate satisfactory level of understanding and implementation in relation to their respective job function.</p>	
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		<p>Palm Oil Mill: Umbul Mas Wisesa Palm Oil Mill has a set of procedure for processing of oil palm Fresh Frut Bunch into CPO and PK, under "Palm Oil Mill Manual" dated 25 March 2019. The procedures explains all activity from receiving FFB into dispatch of products; Such as:</p> <ol style="list-style-type: none"> 1. POM-01-04; Reception in Umbul Mas Wisesa Palm Oil Mill. 2. POM-02-04; Sterilizer in Umbul Mas Wisesa Palm Oil Mill. 3. POM-03-04; Threshing in Umbul Mas Wisesa Palm Oil Mill. 4. POM-04-04; Pressing in Umbul Mas Wisesa Palm Oil Mill. 5. POM-05-04; Clarification in Umbul Mas Wisesa Palm Oil Mill. 6. POM-06-04; Kernel Plant in Umbul Mas Wisesa Palm Oil Mill. 7. POM-07-04; Steam Plant in Umbul Mas Wisesa Palm Oil Mill. 8. POM-08-04; Power Plant in Umbul Mas Wisesa Palm Oil Mill. 9. POM-09-04; Water Treatment in Umbul Mas Wisesa Palm Oil Mill. 10. POM-10-04; Effluent Plant in Umbul Mas Wisesa Palm Oil Mill. 11. POM-11-04; Storage and Dispatch in Umbul Mas Wisesa Palm Oil Mill. 12. POM-12-04; Workshop in Umbul Mas Wisesa Palm Oil Mill. 13. POM-13-04; EFB Plant in Umbul Mas Wisesa Palm Oil Mill. 14. POM-14-04; Biogas Plant in Umbul Mas Wisesa Palm Oil Mill. <p>The procedures are supported by specific Work Insctructions, e.g. as follows:</p> <ol style="list-style-type: none"> 1. POM-01-04-W01; Penimbangan Truk FFB dan Berondolan – Weighing FFB truck and loose fruit. 2. POM-02-04-W01; Loading ramp, Pengisian FFB ke dalam Rebusan Vertical – Loading ramp, FFB loading into vertical sterilizer; 3. POM-02-04-W02; Pengoperasian Vertical Sterilizer – Operating Vertical Sterilizer; a number of key parameter: sterilizer operating for 100 minutes, ensure manometer showing "0" prior to opening the sterilizer. 	
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		<ol style="list-style-type: none"> 4. POM-03-04-W01; Pengoperasian Thresing Machine – Operating Thresing Machine. 5. POM-04-04-W01; Pengoperasian Digester – Operating Digester. 6. POM-04-04-W02; Pengoperasian Screw Press – Operating screw press. 7. POM-04-04-W03; Sand Trap and Vibrating Screen. 8. POM-04-04-W04; Pengoperasian Crude Oil Tank – Operating Crude Oil Tank. 9. POM-05-04-W01; Pengoperasian Continuous Settling Tank – Operating Continuous Settling Tank. 10. POM-05-04-W02; Pengoperasian Clean Oil Tank – Operating Clean Oil Tank. 11. POM-05-04-W03; Pengoperasian Sludge Tank – Operating Sludge Tank. 12. POM-05-04-W04; Pengoperasian Oil Purifier – Operating Oil Purifier. 13. POM-05-04-W05; Pengoperasian Vacuum Drier – Operating Vacuum Drier. 14. POM-05-04-W06; Pengoperasian Sludge Centrifuge – Operating Sludge Centrifuge. 15. POM-06-04-W01; Operating Depericarper. 16. POM-06-04-W02; Pengoperasian Ripple Mill – Operating Ripple Mill. 17. POM-06-04-W03; Operating Claybath Separator. 18. POM-06-04-W04; Pengoperasian Sawipack Stage 1 & Stage 2 – Operating Sawipack to separate kernel and shell fromcracked mixture from ripple mill, throguh dry separation. 19. POM-06-04-W05; Pengoperasian Kernel Silo Drier – Operating Kernel Silo Drier to reduce moisture < 7%. 20. POM-06-04-W06; Pengoperasian Hydrocyclone – Operating Hydrocyclone to separate kernel and shell from sawipack through wet method; 21. POM-07-04-W01; Operating Cation Exchanger. 22. POM-07-04-W02; Operating Degasifier. 	
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		<p>23. POM-07-04-W03; Operating Anion Exchanger. 24. POM-07-04-W06; Operating Thermal Deaerator. 25. POM-07-04-W07; Boiler (Mech 35 MT/hr). 26. POM-07-04-W08; Penanganan Gangguan Sumber Tidak Bergerak Steam Boiler – Handling disturbance from static Steam Boiler. 27. POM-08-04-W01; Operating Genset. 28. POM-09-04-W01; Operating Water Intake. 29. POM-11-04-W01; Pengoperasian CPO Storage Tank – Operating CPO Storage Tank. 30. POM-11-04-W02; Pengoperasian Kernel Bin Storage – Operating Kernel Bin Storage. 31. Analisa FFA CPO No.UMWPOM-WI/LAB/001 – Analysing CPO’s FFA; 32. Analisa FFA Kadar air untuk CPO dispatch No.UMWPOM-WI/LAB/002A – Analysing CPO’s moisture for CPO dispatch; 33. Analisa kadar kotoran dan kadar air untuk kernel dipatch No.UMWPOM-WI/LAB/005A – Analyzing dirt and moisture in kernel for dispatch; 34. Pengiriman CPO No.UMWPOM-WI/LAB/043 – Delivery of CPO; 35. Pengiriman Kernel No.UMWPOM-WI/LAB/044 – Delivery of Kernel;</p> <p>A set of work instruction for mill’s workshop, dated 28th June 2014; including use of welding equipments, cutting metal, operating lathe machine, operating drilling machine, operating portable grinding machine, operating and maintenance of smoke density meter.</p> <p>A set of work instruction for biogas plant, dated 30th August 2014; comprise of: filling in POME into screen chamber and oil grease skimmer, operating of equalization tank, operating of plate heat exchanger and cooling tower, operating of primary clarifier and sludge pit, operating buffer tank, operating anaerobic reactor, operating degassifier, operating Lamella clarifier, operating sludge sump, operating sludge decanter and operating retention pond.</p>	
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3.3.2	A mechanism to check consistent implementation of procedures is in place.	The company has established mechanism to check consistent implementation of procedures under SOP OPM-10-01; dated 06/02/2019; Field Quality Control. The objectives of the procedure are to check if the result of work are in accordance with existing procedures; to evaluate the work and keep in accordance with the standards; to use as a reference for making improvements. Inspections are carried out on items related to harvesting, weeding, manuring, pest and disease, replanting and nursery.	Complied
3.3.3	Records of monitoring and any actions taken are maintained and available.	<p>Record of monitoring in Umbul Mas Wisesa POM are available under documents Action Plan Umbul Mas Wisesa POM as result Vice President Engineering visit (VPE). Description of monitoring result and action plan based on visit 9 Jul 2019 are as follows:</p> <ol style="list-style-type: none"> 1. Mill Area: There is a large amount of EFB fibre building up at the mill again as the transport to Perlabian Estate is less than the production. Action Plan: The MM should sent request to RMO to increase the transport and copy the request to VPE and STM. Status: On going. 2. Kernel Recovery: the clay bath was found to be very dirty and the operator should be cleaning this during processing. Status: Being done continuously. 3. Boiler: A number of the superheater support of boiler number 1 are broken and the VPE has requested that the contractor replace this. Status: Completed on 5 Oct 2019. 4. The FFB from the front FFB conveyor at the loading ramp is dropping the FFB down into the next conveyor, which is damaging the fruit and also the conveyor. The Mill should install a chute to the bottom of the conveyor, so the fruit slides into the conveyor rather than dropping. 5. The drive chain for the incline SFB conveyor has no tensioner sprocket, so the chain jumps teeth on the sprocket, when the conveyor is under load. The Mill should immediately install a tensioner otherwise the drive sprockets will be damaged. 	Complied

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		<p>Due to Covid-19 pandemic, there is no VPE visit in 2020.</p> <p>Available record of operation monitoring in UMWS Estate based on SEM (Senior Estate Manager) visit on 14 Jan 2021.</p> <p>Available record of operation monitoring in UMWN Estate and TUM Estate based on SEM (Senior Estate Manager) visit on 15 Jan 2021.</p> <p>Record of operation monitoring in UMWN Estate and TUM Estate based on VPP (Vice President Plantation) visit on 13 Nov 2019:</p> <ol style="list-style-type: none"> 1. Road Maintenance: With the arrival of the new grader and roller in March this year, the estate has been transformed. The heavy equipment has had a huge beneficial impact on road conditions combined with the importing of additional gravel. 2. Water Management: The management of water continues to be undertaken by Alamsyah across the UMW/CSM complex with excellent records kept. The new formats now display the action taken based on the results of the forthrightly checks. 3. Pest & Disease: There has been ongoing treatment of nettle caterpillars this year based on census work. Chemical stocks are adequate with 1,345 kg of Starthene and the estate has 11/14 drills in working order ready to respond to any increase in pest activity. 	
<p>Criteria 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.</p>			
3.4.1	<p>(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.</p>	<p>SIEA document verified:</p> <ul style="list-style-type: none"> • PT Umbul Mas Wisesa - Umbul Mas Wisesa POM has demonstrated the document of Social-Environment Impact Assessment (SEIA), consisted of: <ul style="list-style-type: none"> - ANDAL Document, Environmental Management Plan and Environmental Monitoring Plan in accordance with "Keputusan Bupati Labuhan Batu No. 503.660/268/SET-KOMISI/XII/2008 tanggal 31 Desember 2008 tentang Kelayakan Lingkungan Hidup Rencana Usaha dan/atau Kegiatan serta Dermaga untuk 	Complied

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		<p>Kepentingan Sendiri (DUKS) PT. Umbul Mas Wisesa di Desa Sei Siarti Kecamatan Panai Tengah dan Desa Tanjung Mulia Kecamatan Kampung Rakyat, Kabupaten Labuhan Batu, Provinsi Sumatera Utara". The scope of study covers 8,719 Ha and palm oil mill with capacity 45 Ton FFB/Hour expandable to 60 Ton FFB/Hour.</p> <ul style="list-style-type: none"> - Addendum of ANDAL as per "Kelayakan Lingkungan Hidup Adendum Analisis Dampak Lingkungan Hidup dan Rencana Pemantauan Lingkungan Hidup Kegiatan perubahan Pengelolaan Limbah Cair Berbasis Clean Development Mechanism dan Perubahan Pengolahan Limbah Padat PKS PT. Umbul Mas Wisesa No.188.44/430/KPTS/2013 – addendum on environmental impact assessment - Environmental Permit as per "Izin Lingkungan Kegiatan Perubahan Pengolahan Limbah Cair berbasis CDM dan Perubahan Pengolahan Limbah Padat Pabrik Kelapa Sawit No.660/221/BPPTSU/2/IV.I/V/2016 - Addendum ANDAL, RKL-RPL TIPE B as per "Keputusan Gubernur Sumatera Utara No: 188.44/381/KPTS/2020 tentang Kelayakan Lingkungan Hidup Addendum Analisis Dampak Lingkungan Hidup, Rencana Pengelolaan Lingkungan Hidup dan Rencana Pemantauan Lingkungan Hidup Tipe B Rencana Kegiatan Pemanfaatan Limbah Padat Tandan Kosong (empty fruit bunch) menjadi torrefied biomass pellets Kapasitas 2,3 ton per jam di Desa Sei Siarti Kecamatan Panai Tengah Kabupaten Labuhanbatu dan Desa Tanjung Mulia Kecamatan Kampung Rakyat Kabupaten Labuhanbatu Selatan Propinsi Sumatera Utara oleh PT Umbul Mas Wisesa", Final nomor: 08/Addendum/2020 dated 13th August 2020 <ul style="list-style-type: none"> • PT Toton Usaha Mandiri has also demonstrated an environmental document named "Dokumen Upaya Pengelolaan Lingkungan Hidup 	
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		<p>(UKL) dan Upaya Pemantauan Lingkungan Hidup (UPL) Perkebunan Kelapa Sawit seluas 1.200 Ha, PT Toton Usaha Mandiri Desa Sei Siarti, Kecamatan Panai Tengah, Kabupaten Labuhanbatu, Provinsi Sumatra Utara” was approved “Keputusan Kepala Badan Pengendalian Dampak Lingkungan Daerah Kabupaten Labuhanbatu No.660/BLH-LB/AM/2009”, datum 2009 with scope of study palm oil plantation area 1,200 Ha.</p> <p>Environmental impact assessments prepared by “Lembaga Penelitian Universitas Sumatera Utara Medan, 2009”. Records of all impact assessments carried out are readily available. All operational areas have undertaken reviews of the environmental impacts on at least an annual basis.</p> <p>PT Umbul Mas Wisesa and PT Toton Usaha Mandiri have a Social Impact Assessment (SIA) document. SIA conducted by the team from the Faculty of Forestry IPB in 2014 with the composition of the team: Handian Purwawangsa, S. Hut, M.Si (Team Leader), Udi Kusnidar, Sulfan Ardiansyah, Jimmy Syah Rasyid outlining Impact positive and Negative development of plantation PT Umbul Mas Wisesa and PT Toton Usaha Mandiri incorporating Matrix PT Umbul Mas Wisesa and PT Toton Usaha Mandiri Social Management Plan consists of; Tenure, Establish communications and networking with stakeholders and associated with PT Umbul Mas Wisesa Improving the quality of public education, public Health Quality Improvement, community economic empowerment and employment).</p> <p>The SIA document described the Social Management Plan that outlines the type Programs, Activities, challenges, opportunities, strategies, output/ outputs and time frame.</p> <p>Community involvement at the time of preparation of the document through Focus Group Discussion (FGD) with the community, such as:</p>	
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		<ul style="list-style-type: none"> • Focus Group Discussion/FGD in Sei Siarti Village on 15 February 2014 which was attended by 26 participants. • FGD in Tanjung Mulia Village on 16 February 2014 which was attended by 19 participants. • FGD with employees of PT UMW-South Estate dated 14 February 2014 which was attended by 25 participants. • FGD with employees of PT UMW-North and PT TUM conducted on 15 February 2014 which was attended by 32 participants. <p>Documentation, list of issues was discus and attendance list are available During this surveillance assessment ASA 1_1 (January 2021), there was no significant changes in social impact practices. The certificate holder still involved affected parties to collect information and develop the social program/plan to mitigate negative impact.</p>	
3.4.2	For the unit of certification, a SEIA is available and social and environmental management plan and its monitoring have been developed with participation of affected stakeholders.	<p>PT Umbul Mas Wisesa has Environmental Management and Monitoring Plan (RKL – RPL), it is submitted regularly to the national and local government every 6 months. The management and monitoring plan report is based on SEIA (AMDAL), it was checked that management and monitoring plan is implemented and reported to local government six monthly based. Last report submitted to Environment agency of Labuhan Batu District and Labuhan Batu Selatan District. The company has appointed EnC team (environmental and conservation team – GMO NS) for responsible to implementation the document.</p> <p>Within the AMDAL documents, the negative and positive impact of oil palm development has been explained. The environmental management and monitoring plan document lined out effort that company should carried out to minimize negative impact and promote positive impact from oil palm development. Under the document, the social aspect identified covers source of livelihood, community’s revenue, community</p>	Complied

		<p>ability, community perception on company activity, social conflict, social-cultural changes, community health status.</p> <p>The Social-Environment Impact Assessment documents have explained the recommendation that should be done by company to minimize negative impact and promote positive impact from social impact management.</p> <p>As commitment to reduce negative impacts in social aspect, the certificate holder created management and monitoring program of social impact annually.</p> <p>This program was documented and timetable with specific target and strategy of each activity.</p> <p>The company have carried out social impact evaluation on annual basis through social survey. Interview result have been summarized and recorded onto "Laporan Pelaksanaan Rencana Pengelolaan Lingkungan (RKL) dan Rencana Pemantauan Lingkungan (RPL) PT Umbul Mas Wisesa Semester I year 2020".</p> <p>Aspect for the survey such as:</p> <ul style="list-style-type: none"> • Livelihood • Local community perception of employment opportunities • Income per month • Mobility • Local community perception related to operational activities <p>Data verified during ASA 1_1:</p> <ul style="list-style-type: none"> - Report of Testing No Seri: 2091/AL/MDN/XII/20, sample type: wastewater tested for physical, chemical and microbiology aspect, dated 17 December 2020. Sample location in Pond No 14 -UMW POM. The result shown comply with Regulation of Environmental Ministry Republic of Indonesia No 5, year 2014 – appendix III. The testing conducted by Accredited Laboratory of PT Mutu International. 	
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		<ul style="list-style-type: none"> - Report of Testing No: AAL.385a/LHU/2020 dated 16th September 2020; sample type testing: ambient air quality, location in front of UMW POM Office. The result shown comply with Government Regulation Republic of Indonesia No 41, year 1999 on Pengendalian Pencemaran Udara. The testing conducted by Accredited Laboratory of PT Itec Solution. - Report of Testing No: AAL.385a/LHU/2020 dated 16th September 2020; sample type testing: noise level, location in UMW POM. The result shown comply with Regulation of Environmental Ministry Republic of Indonesia No 48, year 1996 – appendix I. The testing conducted by Accredited Laboratory of PT Itec Solution. 	
3.4.3	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in participatory way.</p>	<p>Management and monitoring plan based on AMDAL have been covered in regular report of RKL/RPL. Management Plan in accordance with impacts that have been identified in the EIA / UKL-UPL, such as:</p> <ul style="list-style-type: none"> • The impact of a decrease in air quality; • Impact of surface water quality degradation; • Waste; • Hazardous waste (B3); • Soil and water conservation; • Household waste; • Community development; • Job opportunities; • Public health; <p>Monitoring the plan in accordance with the impact that it has identified in the EIA/UKL-UPL, such as:</p> <ul style="list-style-type: none"> • Monitoring of the odor; • Emission; • Noise; • Water quality; • Quality of waste; 	Complied

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		<ul style="list-style-type: none"> • HCV areas; • Fire; • The employment and business opportunities; • Attitudes and perceptions on health, the environment, <p>Data verified – during ASA 1_1:</p> <ul style="list-style-type: none"> • PT Umbul Mas Wisesa - Report of RKL-RPL for first semester year 2020 (January – June 2020) – record of acceptance by Environment Agency (Dinas Lingkungan Hidup) in Labuhanbatu Selatan Regency, no document: 41/UMWS-EKS /VIII/2020, dated 24th August 2020. • SIMPEL – Sistem Informasi Pelaporan Elektronik Lingkungan Hidup, ID TTE: 1611282250-3381 to Ministry of Forest and Environmental of RI, dated 22nd January 2021 for report of RKL-RPL period second semester year 2020. 	
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.	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination were documented in “Human Resources Department Manual” Second Edition – 2019 signed by President Director. Document available at the Operation Unit office, and accessible. The HRD Manual consist of 30 Standard Operating Procedure, among others:</p> <ul style="list-style-type: none"> • General (Doc. No. HRD-00-01/01-02-2019/Rev.1) dated 8 April 2019. • Organization Chart (Doc. No. HRD-00-02/01-02-2019/Rev.1) dated 5 April 2019. • Objective and KPI (Doc. No. HRD-00-03/01-04-2019/Rev.1) dated 8 April 2019 • Risk and Opportunities (Doc. No. HRD-00-04/01-04-2019/Rev.1) dated 8 April 2019. • Recruitment in General (Doc. No. HRD-01-00/01-04-2019/Rev.1) dated 5 April 2019. 	Complied

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		<ul style="list-style-type: none"> Internal Recruitment (Doc. No. HRD-01-01/01-04-2019/Rev.1) dated 8 April 2019. 	
3.5.2	Employment procedures are implemented and records are maintained.	<p>Employment records are well maintained by the HR Department, for example:</p> <ul style="list-style-type: none"> Since 2020 – in UMW POM no new recruitment noted. Employee Promotion Application Letter from temporary worker (PKWT) to permanent workers (daily base/SKU-H), e.g: dated 6th January 2020 as stated by HR Manager letter No.052/JWB-UMOM/III/2020 for Mr Titus Telaubania (OP Despact PK), Mr Herwin Nasution (Helper in boiler station), Agus Suhandi (OP in ETP), Mr Nurul Padli (Weighbridge clecrk). The letter completed with the name of the employee proposed for appointment, Performance Assessment Results of each employee, Statement letter of each employee, Job and Responsibilities of each employee at the time of appointment. These records is related implementation on workers promotion. In 2020 – there was no employee retirement reported. 	Complied
Criteria 3.6: An Occupational health and safety (H&S) plan is documented, effectively 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.	<p>PT Umbul Mas Wisesa - Umbul Mas Wisesa POM has established an Occupational Health and Safety Policy that was signed by President Director dated 27th March 2019, no Dok: QMM-40-01-P04/27-03/2019/Rev. In point 1 was mentioned PT Tolan Tiga Indonesia Support the implementation of all relevant laws and regulation of Republic of Indonesia ad of applicable international agreement and standards relevant to occupational health and safety and at point 2.b mentioned that the company committed to provision of adequate resources for effective implementation of the occupational health and safety (OHS) program and procedure, including strict compliance reviews.</p> <p>PT Umbul Mas Wisesa dan PT Toton Usaha Mandiri has also determined the procedure for OHS under document of Occupational Health and</p>	Complied

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		<p>Safety Manual for second edition – 2019, published date 13th March 2019.</p> <p>The document of procedure consisted of:</p> <ol style="list-style-type: none"> 1. Procedure of Hazard Identification Risk Analysis Determining Control for OHS – No: OHS-01-01 2. Procedure of Hot Work – No: OHS-01-02 3. Procedure of Potential Hazard Report – No: OHS-01-03 4. Procedure of P3K (First Aid) – No: OHS-01-04 5. Procedure of Confined Space - No: OHS-01-06 6. Procedure of Working at Heights – No: OHS-01-06 7. Procedure of Gas Pressure Management - No: OHS-01-07 8. Procedure of Incident Reporting - No: OHS-01-08 9. Procedure of Standard for Installation of Safety Sign - No: OHS-01-09 10. Procedure of Personal Protective Equipment - No: OHS-01-10 <p>UMW POM - the organization has prepared the document of risk assessment as per "DaftarPenilaian dan Pengendalian Risiko K3", last review on 10th September 2020. The document has covered for all activities in Estate and Mill, e.g: general activities, central clinic, fertilizer storage, temporary storage of hazardous waste, security, chemical shed, office, workshop, field (spraying, manuring, harvesting, transport FFB, IPM), emplacement, laboratory, weighbridge, grading station, loading ramp, sterilizer station, chain capstand, pressing station, boiler station, kernel station, static crane, workshop.</p>	
3.6.2	(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.	PT Umbul Mas Wisesa - UMW POM has prepared the program of OHS year 2020 - 2021 and has shown the monitoring of effectiveness as per document "Program P2K3LHS (safety committee) Tahun 2020", such as:	Complied

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		<ol style="list-style-type: none"> 2. Report of OHS performance to Manpower Agency (threes month base) 3. Routine inspection of OHS facilities (fire extinguisher and first aid box) 4. Integrated fire drill (annually) 5. Training for first aider (annually) 6. Training on hazardous waste both of handing and documentation 7. Review of risk assessment 8. General Medical Check Up (annually) and Special Medical Check Up (per threes month base) 9. Socialization of healthy life (every month) <p>The record of effectiveness of implementation the OHS program, e.g:</p> <ol style="list-style-type: none"> 1. During pandemic covid-19, the OHS meeting conducted by virtual. The last record of OHS meeting dated 18 January 2020, location in UMW POM, agenda: review of the meeting result of the last, review of OHS inspection and review of incident report 2. Report of OHS performance for period October - December 2020 was sent to Manpower Agency in Labuhanbatu Selatan Regency, dated 18th January 2020 3. Checklist of availability the first aid kit, dated 15 October 2020; result shown OK. Location in UMW POM 4. MCU in 2020 was postpone due to pandemic covid-19 based on "Surat Edaran Menteri Ketenagakerjaan Republik Indonesia nomor M/7/AS.02.02/V/2020 tentang Rencana Keberlanjutan Usaha Dalam Menghadap Pandemi Corona Virus Disease 2019 (Covid-19) dan Protokol Pencegahan Penularan Covid-19 di Perusahaan disebutkan pada angka 10. Melakukan penundaan sementara pemeriksaan Kesehatan tenaga kerja hingga aspek keselamatan dan Kesehatan kerja terpenuhi atau hingga pandemic covid-19 berakhir. The last Medical Check Up for workers in high risk area conducted in 2019, such as: 	
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		<ul style="list-style-type: none"> • UMW POM: Report of Medical Check Up (annually), last MCU was conducted on 30th September 2019 by Company Doctor and Laboratorium Klinik Kesehatan Spesialis Anugerah Ibu – Medan, e.g: namely Mr Andriansyah – as keep store in Temporary Hazardous Waste. • Monitoring on readiness the fire extinguisher facilities month 15th October 2020, location in Security office, mill office, CPO despatch, thresher station, boiler, ETP and loading ramp station were reported OK <p>5. License/certificates for mill machinery, in UMW POM e.g:</p> <ul style="list-style-type: none"> - Boiler Operator license – SIO namely Mr. Selamat (License No.6129.OPK3-PUBT-B.1/IV/2014 – valid until 3 April 2019), namely Mr. Dedi Kurniawan (License No.10093.OPK3-PUBT-B.1/IX/6 – valid until 23 September 2021, namely Mr. Khairul Saputra (License No.10094.OPK3-PUBT-B.1/IX/6 – valid until 23 September 2021); - Sterilizer operator license (SIO) – Mr. Nur Azlan Ali (license No.6162.OPK3-PUBT-B.II/IV/2014); - Welder certificate – namely Mr. Jhony Marbun (No.00289.0721.0002873.2014) – Surat Pengurusan Perpanjangan No.075/UMWM-GMONS/XII/2017); - Certificate for first aider, namely Mr. Ladira Saputra (license No.670/DTK/P3K/2014), Mr. Jhony Marbun – No.669/DTK/P3K/2014). - License for operator of OHS Motor Gradder, register number: 152266-OPK3-LT/PAA/VII/2019, namely Mr Jamil – dated 30th August 2019 - License for operator of OHS Vibrator Roller Operator, register number: 152270-OPK3-LT/PAA/VIII/2019, namely Mr Risfan, dated 30th August 2019. 	
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		<ul style="list-style-type: none"> - License for operator of OHS Backhoe Loader, register number: 152265-OPK3-LT/PAA/VIII/2019, namely Mr Natal Jon Steven Pardede, dated 30th August 2019. 	
<p>Criteria 3.7: All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.</p>			
<p>3.7.1</p>	<p>(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 and includes assessment of the training.</p>	<p>PT Umbul Mas Wisesa – UMW POM has shown the document of Training Program year 2020 and 2021. Training program provided as per “Program Training Tahun 2020-2021”, such as:</p> <ul style="list-style-type: none"> • Refreshment training environmental aspect, planned in May 2020 and actual realization on 4th May 2020 was attended by 64 workers • Training of MSDS and handling hazardous waste, planned in May 2020 and realization on 10th June 2020 was attended by 12 workers related to chemical handling. • OHS training, planned November 2020 and realization on 28th November 2020 was attended by 75 workers I UMW POM • SCC training planned in October 2020 and realization on 11th November 2020 was attended by 11 workers. • Training on job description planned in February 2020, realization on 28 March 2020 – was attended by 52 workers. • Fire drill and handling of hazardous waste planned in January 2020, realization on 10th February 2020 was attended 76 workers <p>UMW South Estate: Training Program year 2020 - 2021, such as:</p> <ul style="list-style-type: none"> • Training for manuring application (including OHS and environmental aspect), was conducted on 24 February 2020 was attended by 29 workers • Training of leaf sampling unit was conducted on 11th December 2020 was attended by 13 workers. • Training for harvester (including OHS aspect in harvesting), dated 7th November 2020 Data seen: training attendance and training material • Training for safety driving was conducted on 8th December 2020. 	<p>Complied</p>

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		<ul style="list-style-type: none"> • Training for spraying applicator (including for OHS training and environment) and Calibration for Spraying equipment, was conducted on 5th May 2020. • Training of water management was conducted on 20th December 2020 was attended by 5 workers in water management sector • Training of HCV for all workers was conducted on 7th August 2020 	
3.7.2	Records of training are maintained, where appropriate on an individual basis.	<p>Record of training has shown for an individual basis as per document of "Employee Training and Education Record", e.g:</p> <ul style="list-style-type: none"> • Namely Mrs Nindy Praweswari (Weighbridge OP), training record: <ul style="list-style-type: none"> • Dated 16th January 2019; socialization of grievance policy • Dated 20th February 2019; fire drill, first aid training, handling of hazardous waste • Dated 4th September 2019; socialization on using of mobile phone • Dated 20th March 2020; training of implementation the operational procedure in POM • Dated 31st October 2020; training of SCC requirement and implementation • Dated 2nd November 2020; socialization of company policies • Namely Mr Jefri Nasution (Processing foreman shift-B), training record: <ul style="list-style-type: none"> • Dated 3rd January 2019; refreshment training of works instruction • Dated 4th September 2019; socialization on using of mobile phone • Dated 18th November 2019; socialization of medical insurance (BPJS JKN & TKO) • Dated 3rd March 2020; refreshment training of works instruction • Dated 18th April 2020; refreshment training of HIRADC • Dated 2nd September 2020; socialization of company policies. 	Complied

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		<ul style="list-style-type: none"> • Namely Mr Andriansyah (material clerck), training record: <ul style="list-style-type: none"> • Dated 9th September 2019; refreshment training of works instruction in warehouse • Dated 18th November 2019; socialization of medical insurance (BPJS JKN & TKO) • Dated 19th December 2019; refreshment training of first aid • Dated 20th March 2020; training of job description and HIRADC • Dated 10th June 2020; training of MSDS • Dated 26th November 2020; refreshment training of OHS • Namely Mr Hendra Saputra (foremen for harvester in UMW South Estate); training record: <ul style="list-style-type: none"> - Dated 22nd December 2014; Training for first aider - Dated 5th January 2015 - Training on quality of FFB - Dated 23rd November 2016 – Refreshment training for first aider - Dated 26th April 2017 - Refreshment training on quality of FFB and harvesting - Dated 21st December 2017 - Training for first aider - Dated 17th January 2018; Refreshment training on implementation of harvesting procedure and sortation of FFB - Dated 2nd May 2018 - Training of fire drill - Dated 14th August 2018 – Refreshment training of fire drill - Dated 26th May 2019 - Refreshment training on implementation of harvesting procedure and sortation of FFB - Dated 17th December 2020 – Refreshment training for first aider • Namely Mrs Marwan (pesticides applicator in UMW South Estate), training record: <ul style="list-style-type: none"> - Dated 11th November 2017; training on handling of limited pesticides and MSDS 	
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		<ul style="list-style-type: none"> - Dated 17th November 2017; training of calibration the knapsack (spraying equipment) - Dated 21st December 2017; training related to OHS and first aid - Dated 18th April 2018; socialization of standard of pesticides applications - Dated 17th July 2018; refreshment training of calibration the knapsack (spraying equipment) - Dated 10th August 2018; training on using the knapsack (spraying equipment) - Dated 14th January 2018; training of MSDS of chemical material - Dated 16th December 2019; training of calibration the knapsack (spraying equipment) - Dated 25th November 2020; refreshment training on using the knapsack (spraying equipment) - Dated 17th December 2020; socialization the company policy - Dated 29th December 2020; training related to OHS 	
3.7.3	<p>Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.</p>	<p>UMW POM: "Training Supply Chain" dated 11 December 2020 attended by 11 workers: Mill Manager, Mill Assistant, Office assistant, security, grading officer, weighbridge operator, dispatch officer. Review training record Nurul Padli (weighbridge officer) on 11 December 2020 – Training Supply Chain; Training record Dedy Setiadi (dispatch/laboratory) on 11 December 2020 – Training Supply Chain; Maya H Tamba (office assistant) on 11 December 2020 – Training Supply Chain.</p> <p>UMW South UMW North and TUM Estate: Training RSPO P&C 2018 including supply chain element as part of Criterion 3.8; in UMW South Estate dated 7 November 2019. The training attended by all Estate Manager, all Head Assistant, all Assistant and related staff of PT Umbul Mas Wisesa and PT Toton Usaha Mandiri. Due</p>	Complied

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		to Covid-19 pandemic, there is no RSPO Supply Chain training in 2020. For 2021 training program, supply chain training scheduled in February.	
Criteria 3.8: Supply chain requirements for mills. Procedure note: all requirements are classified as Critical Indicators . However it will not contribute to suspension if there is more than 5 non-compliance within a principle)			
3.8.1	<p>Identity Preserved Module A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme. Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.</p>	<p>Management decided PT. Umbul Mas Wisesa – Umbul Mas Wisesa POM, to implement RSPO Supply Chain Module Identity Preserved. With the implementation of Module Identity Preserved, the POM only received and process FFB from certified company-owned estate and certified independent smallholder. Umbul Mas Wisesa POM implemented the procedure of supply chain and traceability based on The procedure is SOP Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019/Rev.0 dated 18 March 2019. Procedure completed with the flow diagram of FFB receiving, processing in POM, CPO shipping to tank terminal; Receiving and shipping of CPO from tank terminal. Person responsible for implementation of RSPO Supply Chain standard at the POM is the Mill Manager, whilst in the tank terminal is the storage tank manager.</p>	Complied
3.8.2	<p>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 mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	<p>Management decided PT. Umbul Mas Wisesa – Umbul Mas Wisesa POM, to implement RSPO Supply Chain Module Identity Preserved. With the implementation of Module Identity Preserved, the POM only received and process FFB from certified company-owned estate and certified independent smallholder. This indicator is not applicable.</p>	Complied
3.8.3	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p>	<p>The estimate annual tonnage for certified FFB, CPO and PK are available in the Estate and Mill annual production budget for 12 months since last surveillance assessment. The FFB tonnage received from all certified supply bases. Umbul Mas Wisesa POM received certified raw material (Fresh Fruit Bunch) from its own estate: UMW South Estate, UMW North Estate, Toton Usaha Mandiri Estate; and from the Independent Smallholders: Koperasi Serba Usaha Suka Makmur.</p>	Complied

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		The certification of all Estates is fall under PT. Umbul Mas Wisesa – Umbul Mas Wisesa POM with certificate number RSPO 611834, first certification starts on 27 March 2015, and expired on 26 March 2025. KSU Suka Makmur has been certified as independent smallholder with certificate number RSPO 687965, first certification starts on 5 April 2018, and expired on 4 April 2023.	
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	PT. Umbul Mas Wisesa – Umbul Mas Wisesa Palm Oil Mill has been registered in RSPO IT Platform with registered ID number RSPO_PO1000001670.	Complied
3.8.5	<p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> 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 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. 	<p>PT. Umbul Mas Wisessa has a written procedures and/work instruction for ensuring the implementation of RSPO Supply Chain Standard. The procedure is SOP Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019/Rev.0 dated 18 March 2019. Procedure completed with the flow diagram of FFB receiving, processing in POM, CPO shipping to tank terminal; Receiving and shipping of CPO from tank terminal. Person responsible for implementation of RSPO Supply Chain standard at the POM is the Mill Manager. The procedure are complete and up to date covering the implementation of all elements in the supply chain requirements, such as:</p> <ul style="list-style-type: none"> a. Sales process, covering from contract approval to delivery of oil palm product (CPO and PK) including information of supFly chain mechanism; b. Process at the estates, covers harvesting, FFB and loose fruit delivery include harvesting record and delivery to the Palm Oil Mill; c. Process at Palm Oil Mill covers FFB and Loose fruit receiving, identification, production process, delivery of product and recording; d. Evaluation by CB; e. Transportation records; f. Internal control; g. Contractor control. 	Complied

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		<p>The mill only receives and process certified FFB, therefore the procedure for receiving and processing non-certified FFB is not applicable.</p> <p>The mill has complete and up to date records and reports that demonstrated compliance with the Identity Preserved requirements including training records. Record seen data of FFB received, CPO and PK stock, production, dispatch, OER, KER, refreshment training of RSPO Supply Chain on 11 December 2020, attended by 11 personnel.</p>	
3.8.6	<p>Internal Audit</p> <p>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill;</p> <p>a) Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>b) Effectively implements and maintains the standard requirements within its organisation.</p> <p>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p>	<p>Procedure for Internal Audit refer to SOP Routine Visit and Internal Audit No.ENC-01-02/04-03-2019/Rev.2 date 18 March 2019.</p> <p>Section 6. Frequency and Timing stipulates the internal audits are conducted at least once a year according to the standards referred to. Section 5.4 Implementation of Routine/Internal Audit Visits stipulates: <i>In general, non-conformities in each of the principle and criteria, rules and requirement of the sustainable system are categorized under major, minor and observation. Such findings must be immediately followed up. The unit manager may undertake to implement corrections and may also plan improvements according to result of internal audit. Recommended improvement must be completed with timeframe. A review of the non-compliance found in a previous internal audit should be made on the next visit.</i></p> <p>The latest internal audit carried out on 20-23 December 2020, against RSPO P&C 2018 Indonesia National Interpretation 2020. The internal auditor assessed Criteria 3.8 related to RSPO SCCS. Corrective action related to internal audit findings have been determined.</p> <p>Latest Management Review in UMW POM conducted on 14 Jan 2021. Management review has discussed:</p> <ul style="list-style-type: none"> Results of internal audits; internal audit in UMW POM conducted on 23 Nov to 5 Dec 2020 and 20-23 Dec 2020, by ENC RMO NS Team, 	Complied

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		<p>summary of finding and corrective action have been documented in Visit Report ENC Team.</p> <ul style="list-style-type: none"> • Customer feedback; Based on review of customer feedback conducted by Marketing Department, there is no complaint related CPO and PK quality sold by UMW POM. • Process performance and product conformity. FFB processed in UMW POM are coming from owned estates and neighbouring company under the same management (PT TUM), also from smallholder which is RSPO certified under certificate number RSPO 687965 (KSU Suka Makmur). • Status of preventive and corrective actions. All finding discussed in this Management Review have been closed and attached in the minutes of management review. • Follow-up actions from management reviews. Result of previous management review were always discussed, mostly regarding performance, target achievement and FFB quality./ • Changes that could affect the management system. There is SOP revision related Supply Chain, Supply Chain and Traceability of Palm Product, previously ENC's SOP become Marketing's SOP (MKT-03-06); revision of SOP Customer Handling (MKT-03-02/04-12-2020/Rev.2). • Recommendations for improvement. Carried out all recommendation from internal audit. <p>The management review output, as recorded in minutes of management review meeting dated 14 January 2021:</p> <ul style="list-style-type: none"> • Improvement of the effectiveness of the management system and its processes: Coordinating with Marketing Department for buyer satisfaction evaluation. <p>Resources needs: the PT. Umbil Mas Wisesa is committed to continue provision of adequate and relevant resources for the implementation, maintenance and improvement of RSPO SCCS requirement.</p>	
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<p>3.8.7</p>	<p>Purchasing and Goods In</p> <ul style="list-style-type: none"> i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received. ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage. iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents. 	<p>PT. Umbul Mas Wisesa ensured that certified FFB received are RSPO certified based on the source of FFB. These FFB source are certified under PT. Umbul Mas Wisesa – UMW POM certificate (RSPO 611834). Based on interview with weighbridge clerk and FFB receiving station, UMW POM only received certified FFB from sustainable source: UMW South Estate; UMW North Estate; Toton Usaha Mandiri Estate; and from the Independent Smallholders: Koperasi Serba Usaha/KSU – Suka Makmur.</p> <p>FFB received from non-certified source being sold as non-certified FFB to non-certified palm oil mill.</p> <p>PT. Umbul Mas Wisesa – UMW POM has verified the status of the supply base certificate during Internal Audit on 20-23 December 2020, with certificate number RSPO 611834, valid until 26 March 2025.</p> <p>PT. Umbul Mas Wisesa – UMW POM has demonstrated SOP Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019/Rev.0 dated 18 March 2019. Chapter 5.2 of the procedure indicates the Weighbridge Clerk has responsibility to input data and print “Receiving Slip” based on FFB Delivery Note, covering information e.g. estate name and block number, mill name, date of delivery, product description and quantity, RSPO certificate number, transporter identity and unique identification number.</p> <p>The procedure explains Operating Unit can coordinate to an evaluation with CB about the quota between the OU and the CB (projected overproduction). During this annual surveillance assessment, Umbul Mas Wisesa POM was not over sold the CPO and PK production.</p> <p>The procedure explains control of product non-conformity refer to Marketing Department Manual - SOP Customer Complaint Handling No.MKT-03-02/26-04/2018/rev.1 dated 30 April 2018. The procedure covers returned of all non-conforming product and/or documents. The responsible is Operating Unit Manager and Senior Manager Marketing. Based on audit, UMW POM only receive and processed sustainable FFB. There has been no complaint from buyer.</p>	<p>Complied</p>
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		<p>Records of purchasing goods in available:</p> <p>Delivery of FFB from Field "SPB" No.UMWN/0035513 dated 21 January 2021 from UMW North Estate, Division III, block 06N01A; planting year 2006, total 228 bunches. Stamp Sustainable Product-IP. Receiving slip/weighbridge ticket No.FFB21001476W; Truck BK 8035 YN; UMW North Estate dated 21 January 2021; D/O No.0035513; block ID 06N01A; planting year 2006; total bunches 225; nett weight 2,640 kg. Stamp Sustainable Product-IP.</p> <p>Delivery of FFB from Field "SPB" No.UMWE/043526 dated 21 January 2021 from UMW South Estate, Division III, Block B24 (228 bunches) dan B25 (600 bunches); planting year 2005, total 828 bunches. Stamp Sustainable Product-IP. Receiving slip/weighbridge ticket No.FFB21001439W; Truck BK 9022 YM; UMW South Estate dated 21 January 2020; D/O No.043526; Block ID 05B24 and 05B25; planting year 2005; total bunches 828; nett weight 5,550 kg. Stamp Sustainable Product-IP.</p> <p>Delivery of FFB from Field "SPB" No.TUME/023629 dated 21 January 2021 from TUM Estate, Division I, Block 09L20; planting year 2009, total 486 bunches. Stamp Sustainable Product-IP. Receiving slip/weighbridge ticket No.FFB21001467W; Truck BK 9138 TO; TUM Estate dated 21 January 2021; D/O No.023629; Block ID 09L20; planting year 2009; total bunches 486; nett weight 5,270 kg. Stamp Sustainable Product-IP.</p> <p>Delivery of FFB from Field "SPB" No.KSU.SM/004 dated 12 January 2021 from Koperasi Serba Usaha Suka Makmur/KSU-SM, Block 09C26 (150 bunches), 09D32 (113 bunches), 09F55 (133 bunches) and 09F56 (142 bunches); planting year 2009; total 538 bunches; vehicle No. BK 8043 YF. Stamp Sustainable Product-IP RSPO 687965. Receiving slip/weighbridge ticket No.FFB21000717W, Koperasi Serba Usaha Suka</p>	
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		Makmur dated 12 January 2021; D/O No.004; total bunches 538; nett weight 6,593 kg. Stamp Sustainable Product-IP.	
3.8.8	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ol style="list-style-type: none"> 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. 	<p>The SOP Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019/Rev.0 dated 18 March 2019 regulated that several information required by the standard have to be available in the sales and goods out document. Sales and goods out documents seen are as follows:</p> <p>CSPO</p> <ul style="list-style-type: none"> - Contract No.2020/LTC-CPO/UMW/44 between Seller: PT Umbul Mas Wisesa (address Gedung Forum Nine Lt.10, Suite 1-11, Jl. Imam Bonjol No.9 Petisah Tengah, Medan Petisah, Kota Medan Sumatera Utara - 20112) and Buyer: PT Ivo Mas Tunggal (address Sinar Mas Land Plaza Menara 2 Lt.30, Jl. MH Thamrin No.51, Gondangdia, Menteng, Jakarta Pusat); dated 25 September 2020; for sales of 1,500 MT Crude Sustainable Palm Oil – RSPO IP; Certificate No. RSPO 611834. - Dispatch Slip No.CPO20001249W, dated 10/11/2020; from PT. Umbul Mas Wisesa-UMW POM; product CPO; quantity 28.23 MT; DO No.2020/UMW-CPO/LTC/DO/134; Certificate RSPO 611834; Module Sustainable Product IP; Vehicle ID No.BK 9022 VV; CV Transporter Jasa Sahabat Abadi; - Shipping Announcement, with transaction ID No. TR-d80b8460-1cad for 1,482.19 MT CSPO IP; from PT Umbul Mas Wisesa (RSPO_PO1000001670) as Seller to PT IVO MAS TUNGGAL-LUBUK GAUNG (RSPO_PO1000003168) as Buyer. Shipping date 30-11-2020; Contract 2020/LTC-CPO/UMW/44; Confirmation date 22-12-2020. <p>Detail Information available:</p> <ul style="list-style-type: none"> • The name and address of the buyer: PT Ivo Mas Tunggal (address Sinar Mas Land Plaza Menara 2 Lt.30, Jl. MH Thamrin No.51, 	Complied

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		<p>Gondangdia, Menteng, Jakarta Pusat;</p> <ul style="list-style-type: none"> • The name and address of the seller: PT Umbul Mas Wisesa, Gedung Forum Nine Lt.10, Suite 1-11, Jl. Imam Bonjol No.9 Petisah Tengah, Medan Petisah, Kota Medan 20112; • The loading or shipment / delivery date: 10 – 30 November 2020; • The date on which the documents were issued: Contract on 25 September 2020; Dispatch Slip on 10 November 2020; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations): CSPO RSPO IP notation on all records; • The quantity of the products delivered: from sampled dispatch slip: 28.23 MT of CSPO; • Any related transport documentation: vehicle ID No. BK 9022 VV by CV Jasa Sahabat Abadi; • Supply chain certificate number of the seller: RSPO 611834; • A unique identification number: Contract No.2020/LTC-CPO/UMW/44 (verified on all record). <p>PK. Contract:</p> <ul style="list-style-type: none"> - Contract No.2020/LTC-PK/UMW/08 between Seller: PT Umbul Mas Wisesa (address Gedung Forum Nine Lt.10, Suite 1-11, Jl. Imam Bonjol No.9 Petisah Tengah, Medan Petisah, Kota Medan Sumatera Utara - 20112) and Buyer: PT Ivo Mas Tunggal (address Sinar Mas Land Plaza Menara 2 Lt.30, Jl. MH Thamrin No.51, Gondangdia, Menteng, Jakarta Pusat); dated 2 September 2020; for sales of 800 MT Crude Sustainable Palm Kernel – RSPO IP; Certificate No. RSPO 611834. - Delivery Order No.2020/LTC-PK/UMW/DO/09 dated 2 September 2020, ordering shipment of 800 MT PK – RSPO IP, from PT Umbul Mas Wisesa – Loko PKS Perlabian (sister company) to buyer PT IVO MAS TUNGGAL-LUBUK GAUNG. - Dispatch Slip No.PK20000248W, dated 01/12/2020; from PT Umbul 	
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		<p>Mas Wisesa-UMW POM; product Palm Kernel; quantity 26.44 MT; DO No.2020/LTC-PK/UMW/DO/09; Certificate RSPO 611834; Module Sustainable Product IP; Vehicle ID No. BK 9456 CT; CV Jaya Pertama;</p> <p>- Shipping Announcement, with transaction ID No. TR-04fa0eca-5c58 for 250.68 MT CSPK IP; from PT Umbul Mas Wisesa (RSPO_PO1000001670) as Seller to PT IVO MAS TUNGGAL-Lubuk Gaung (RSPO_PO1000006558) as Buyer. Shipping date 30-11-2020; Contract 2020/LTC-PK/UMW/09; Confirmation date 16-12-2020.</p> <p>Detail Information available:</p> <ul style="list-style-type: none"> • The name and address of the buyer: PT Ivo Mas Tunggal (address Sinar Mas Land Plaza Menara 2 Lt.30, Jl. MH Thamrin No.51, Gondangdia, Menteng, Jakarta Pusat; • The name and address of the seller: PT Umbul Mas Wisesa, Gedung Forum Nine Lt.10, Suite 1-11, Jl. Imam Bonjol No.9 Petisah Tengah, Medan Petisah, Kota Medan 20112; • The loading or shipment / delivery date: 1 December 2020 based on Dispatch Slip; • The date on which the documents were issued: Contract on 2 September 2020; Dispatch Slip on 1 December 2020; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations): CSPK RSPO IP notation on all mill records; • The quantity of the products delivered: from sampled dispatch slip: 26.44 MT of PK; • Any related transport documentation: vehicle ID No. 9456 CT by CV Jaya Pertama; • Supply chain certificate number of the seller: RSPO 611834 <p>A unique identification number: Contract No. 2020/LTC-PK/UMW/08 (verified on all record).</p>	
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<p>3.8.9</p>	<p>Outsourcing Activities</p> <p>i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification.</p> <p>ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</p>	<p>The transport for RSPO certified sustainable FFB, CPO and PK delivery were carried out by several contractors. These contractors were appointed, contracted and instructed by PT. Umbul Mas Wisesa. During transport, legal ownership of CSPO and CSPK are still under PT. Umbul Mas Wisesa. This evident by sales contract that between PT. Umbul Mas Wisesa and the buyer.</p> <p>Contract:</p> <ul style="list-style-type: none"> - Agreement base on "Perjanjian Pengangkutan No.02/Angkutan/CPO/UMW/13" dated 1 October 2013; between PT. Umbul Mas Wisesa and CV Sahabat for transport of CPO from UMW POM to Perlabian Tank Terminal. The contract covers transport cost for POM; sanction (tolerable susut). There is a contract addendum "Addendum No.2017/02 Perjanjian Pengangkutan No.02/Angkutan/CPO/UMW/13" dated 1 January 2017 whereby stipulated contract validity (will be automatically extended since 1 January 2017) – signed on 1 January 2017. - Agreement base on "Addendum No.2014/01 Perjanjian Pengangkutan No.01/Angkutan/CPO/UMW/13" dated 2 September 2014; between PT Umbul Mas Wisesa and CV Tua Gabe for transport of CPO from UMW POM to Perlabian Tank Terminal. The contract covers transport cost for POM; sanction (tolerable shrinkage). - Agreement base on "Perjanjian Pengangkutan No.2014/Angkutan/PK/UMW/02" dated 22 September 2014; between PT. Umbul Mas Wisesa and CV Tua Gabe for transport of PK from UMW POM to designated buyer. The contract covers transport cost for POM; sanction (tolerable shrinkage). - Agreement base on "Surat Perjanjian Kerja No.01/RMO-UMWN/JR/I/2020" dated 2 January 2020; between PT. Umbul Mas Wisesa and UD Juir for transport of FFB from UMW North Estate to UMW POM. The contract covers transport FFB quota per month, working condition, etc. 	<p>Complied</p>
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		<p>PT. Umbul Mas Wisesa – Umbul Mas Wisesa POM has demonstrated SOP Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019/Rev.0 dated 18 March 2019. Section 5.4 Evaluation by Certification Body stipulates the Contractor Control: POM ensures that related contractors in the product supply chain have followed applicable procedures and audited contractors by internal/external if necessary.</p> <p>“Surat Pernyataan CV Tua Gabe” dated 22 January 2021 whereby stipulated CV Tua Gabe is willing to comply with RSPO Supply Chain requirement; CV Tua Gabe is willing to be audited by certification body if needed.</p> <p>“Surat Pernyataan CV Angkutan Sahabat” dated 22 January 2020 whereby stipulated CV Angkutan Sahabat is willing to comply with RSPO Supply Chain requirement; Angkutan Sahabat is willing to be audited by certification body if needed.</p> <p>“Surat Pernyataan UD Juir” dated 2 January 2020 whereby stipulated contractor is willing to comply with RSPO Supply Chain requirement; Angkutan Sahabat is willing to be audited by certification body if needed.</p> <p>Means of control by Umbul Mas Wisesa POM: “Buku Pemeriksaan Kendaraan CPO dan PK”, sampled: CPO truck No. BK 8113 CK from CV Tua Gabe; inspected to carry CPO from UMW POM to Perlabian tank terminal, dated 22 January 2021.</p> <p>PK truck No. BK 9296 YG from CV Tua Gabe inspected to carry PK from Umbul Mas Wisesa POM to Perlabian POM, dated 22 January 2021.</p>													
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	<p>FFB, CPO and PK Transporter of PT. Umbul Mas Wisesa:</p> <table border="1" data-bbox="1131 1204 1975 1399"> <thead> <tr> <th>Contractor</th> <th>Contact Person</th> <th>Telephone</th> <th>Address</th> </tr> </thead> <tbody> <tr> <td>CV Tua Gabe</td> <td>Amin</td> <td>+62852609 28090</td> <td>Jalan Darussalam No.25, Sei Sikambang D – Medan Petisah 20119</td> </tr> <tr> <td>CV Sahabat</td> <td>Hedi Saputra</td> <td>+62852617 14008</td> <td>Jalan Asia Mega Mas Blok CC No.14, Medan</td> </tr> </tbody> </table>	Contractor	Contact Person	Telephone	Address	CV Tua Gabe	Amin	+62852609 28090	Jalan Darussalam No.25, Sei Sikambang D – Medan Petisah 20119	CV Sahabat	Hedi Saputra	+62852617 14008	Jalan Asia Mega Mas Blok CC No.14, Medan	Complied
Contractor	Contact Person	Telephone	Address												
CV Tua Gabe	Amin	+62852609 28090	Jalan Darussalam No.25, Sei Sikambang D – Medan Petisah 20119												
CV Sahabat	Hedi Saputra	+62852617 14008	Jalan Asia Mega Mas Blok CC No.14, Medan												

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		UD Juir	Rio Rambe/ Ghazali Surya Siregar	+62813971 89744	Jl. Panglima Sudirman No.65, Labuhan Bilik	
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	PT. Umbul Mas Wisesa inform the audit team in case there is changes in the list of FFB, CPO and PK transporter through the RSPO P&C Pre Audit Information checklist.				Complied
3.8.12	<p>Record keeping</p> <p>i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.</p> <p>ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.</p> <p>iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p>iv) For Mass Balance Module, the mill:</p> <p>a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</p> <p>b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock).</p>	<p>The Mill has implemented RSPO Supply Chain Certification Standard based on procedure SOP Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019/Rev.0 dated 18 March 2019. The procedure explains all aspects of supply chain and traceability scope in PT. Umbul Mas Wisesa: FFB harvesting, harvest recording and delivery to Palm Oil Mill; FFB receiving and processing in Palm Oil Mill, CPO and PK production and reporting; CPO and PK dispatch from Palm Oil Mill and receiving in storage tank for export; Shipping instruction and preparation; CPO and PK stock balancing post-shipping.</p> <p>Umbul Mas Wisesa Mill maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements. Daily Production Figure for 31 Dec 2020: FFB received month todate 11,971.952 MT; year todate 181,340.924 MT. Monthly production report is available containing records of FFB received by UMW POM from UMW South Estate, UMW North Estate, TUM Estate and KSU Suka Makmur, all FFB received by UMW POM are certified. The record contains CPO and PK production, dispatch and stocks. Extraction rate of CPO and PK are recorded as well.</p> <p>The SOP Supply Chain and Traceability of Palm Products No.MKT-03-06/04-03-2019/Rev.0 dated 18 March 2019; Section 5.2 Production Process stipulates storage and control of recording related to product sales, transportation until product delivery is stored with minimum period of 5 years.</p>				Complied

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		<p>PT. Umbul Mas Wisesa – UMW POM is able to provide estimate volume of CPO and PK in a year period as in “Budget Produksi Bulanan” consists estimate of FFB receiving from UMW South Estate, UMW North Estate, Toton Usaha Mandiri Estate and Independent Smallholders (KSU Suka Makmur).</p> <p>Estimate of FFB volume received and processed in Umbul Mas Wisesa POM for period January to December 2021 is 91,500.13 MT (UMW South Estate); 57,226.84 MT (UMW North Estate); 26,562.00 MT (TUM Estate); 843.00 MT (KSU Suka Makmur), therefor the total is 176,131.97 MT. Estimated volume of CPO produced is 41,391.01 MT and estimated volume of PK produced is 7,045.28 MT.</p> <p>CPO:</p> <ul style="list-style-type: none"> - Contract No.2020/LTC-CPO/UMW/44 between Seller: PT Umbul Mas Wisesa (address Gedung Forum Nine Lt.10, Suite 1-11, Jl. Imam Bonjol No.9 Petisah Tengah, Medan Petisah, Kota Medan Sumatera Utara - 20112) and Buyer: PT Ivo Mas Tunggal (address Sinar Mas Land Plaza Menara 2 Lt.30, Jl. MH Thamrin No.51, Gondangdia, Menteng, Jakarta Pusat); dated 25 September 2020; for sales of 1,500 MT Crude Sustainable Palm Oil – RSPO IP; Certificate No. RSPO 611834. - Dispatch Slip No.CPO20001249W, dated 10/11/2020; from PT. Umbul Mas Wisesa-UMW POM; product CPO; quantity 28.23 MT; DO No.2020/UMW-CPO/LTC/DO/134; Certificate RSPO 611834; Module Sustainable Product IP; Vehicle ID No.BK 9022 VV; CV Transporter Jasa Sahabat Abadi; - Shipping Announcement, with transaction ID No. TR-d80b8460-1cad for 1,482.19 MT CSPO IP; from PT Umbul Mas Wisesa (RSPO_PO1000001670) as Seller to PT IVO MAS TUNGGAL-LUBUK GAUNG (RSPO_PO1000003168) as Buyer. Shipping date 30-11-2020; Contract 2020/LTC-CPO/UMW/44; Confirmation date 22-12-2020. <p>PK:</p>	
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		<ul style="list-style-type: none"> - Contract No.2020/LTC-PK/UMW/08 between Seller: PT Umbul Mas Wisesa (address Gedung Forum Nine Lt.10, Suite 1-11, Jl. Imam Bonjol No.9 Petisah Tengah, Medan Petisah, Kota Medan Sumatera Utara - 20112) and Buyer: PT Ivo Mas Tunggal (address Sinar Mas Land Plaza Menara 2 Lt.30, Jl. MH Thamrin No.51, Gondangdia, Menteng, Jakarta Pusat); dated 2 September 2020; for sales of 800 MT Crude Sustainable Palm Kernel – RSPO IP; Certificate No. RSPO 611834. - Delivery Order No.2020/LTC-PK/UMW/DO/09 dated 2 September 2020, ordering shipment of 800 MT PK – RSPO IP, from PT Umbul Mas Wisesa – Loko PKS Perlabian (sister company) to buyer PT IVO MAS TUNGGAL-LUBUK GAUNG. - Dispatch Slip No.PK20000248W, dated 01/12/2020; from PT Umbul Mas Wisesa-UMW POM; product Palm Kernel; quantity 26.44 MT; DO No.2020/LTC-PK/UMW/DO/09; Certificate RSPO 611834; Module Sustainable Product IP; Vehicle ID No. BK 9456 CT; CV Jaya Pertama; - Shipping Announcement, with transaction ID No. TR-04fa0eca-5c58 for 250.68 MT CSPK IP; from PT Umbul Mas Wisesa (RSPO_PO1000001670) as Seller to PT IVO MAS TUNGGAL-Lubuk Gaung (RSPO_PO1000006558) as Buyer. Shipping date 30-11-2020; Contract 2020/LTC-PK/UMW/09; Confirmation date 16-12-2020. 	
3.8.13	<p>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.</p>	<p>Extraction rate is applied to provide reliable estimation of CPO and PK produced. For year 2021, the estimated extraction rate from FFB into CPO is 23.50%, whilst from FFB to PK is 4.00%. Based on Daily Production Figure 2020, actual extraction rate ratios from FFB into CPO is 23.14% (average 12 months), whilst from FFB to PK is 4.06% (average 12 months).</p>	Complied
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	<p>The actual Oil Extraction Rates (OER) and Kernel Extraction Rates (KER) are monitored on daily basis through sounding result and documented in Daily Production Figure.</p>	Complied

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		<p>Daily Production Figure dated 31 December 2020: FFB received month todate is 11,971.95 MT; year todate is 166,814.03 MT; FFB processed month todate is 12,072.25 MT; year todate is 166,814.03 MT; CPO Stock is 1,724.16 MT; PK Stock is 266.88 MT; OER is 23.14%; KER is 4.06%. Daily Production Figure dated 21 January 2021: FFB Stock is 139.06 MT; FFB received today is 538.39 MT; month todate is 9,446.25 MT; year todate is 9,446.25 MT; FFB processed today is 575.83 MT; month todate is 9,344.64 MT; year todate is 9,344.64 MT; CPO Stock is 944.76 MT; CPO Dispatched is 293.93 MT; CPO Produced is 138.37 MT; CPO end stock is 788.19 MT; PK Stock is 220.73 MT; PK received is 0; PK dispatched is 0; PK Produced is 23.07 MT; PK end stock is 243.80 MT; OER is 24.14%; KER is 3.99%.</p> <p>"Laporan Cek Sounding CPO Storage Tank" – CPO tank sounding, dated 21 January 2021; Reading in Storage Tank PLST02 is 127.90 MT and UMST02 is 660.29 MT. "Laporan Cek Sounding Kernel Bin Storage" – palm kernel silo sounding, dated 21 January 2021; Reading in silo PLPK03 is 89.60 MT; in PLPK04 is 117.18 MT; UMPK01 is 37.02 MT.</p>	
3.8.15	<p>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.</p>	<p>PT Umbul Mas Wisesa - UMW POM did not receive any non-certified FFB. Therefore, no non-certified FFB being entered the process, no non-certified CPO and PK being produced, no non-certified product being dispatched. Storage tank for CPO dedicated only for certified oil. Silo for PK used to store certified product. PT Tolan Tiga Indonesia - Perlabian POM, act as Tank Terminal has one dedicated tank to received CPO from UMW POM. Currently Tank uses for RSPO certified CPO are PLST02 (capacity 500 MT). All CPO received in Perlabian POM has a designated piping system to pump the CPO from UMW POM to the tanks. UMW POM bought FFB from the certified partnering outgrower, which is Koperasi Serba Usaha Suka Makmur. Based on Daily Production Figure dated 31 December 2020, FFB received from KSU Suka Makmur for the</p>	Complied

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		<p>whole year 2020 is 583.05 MT. In 2020, UMW POM no longer bought FFB from un-certified supplier then sold it to another palm oil mill. There is no contamination in UMW POM during receiving, processing, storage or transport of certified oil palm product. The mill has demonstrated the process integrity for Identity Preserved (IP) module.</p>	
<p>3.8.16</p>	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p>	<p>PT Umbul Mas Wisesa – UMW POM is a palm oil mill which takes legal ownership and physically handled RSPO certified sustainable oil palm product (FFB, CSPO and CSPK), therefore the site has been registered in RSPO IT Platform with ID number RSPO_PO1000001670.</p> <p>As a Palm Oil Mill which takes legal ownership and physically handled RSPO certified sustainable oil palm product, PT. Umbul Mas Wisesa – UMW POM has made Shipping Announcement for certified CPO and PK sold.</p> <p>For example:</p> <ul style="list-style-type: none"> Shipping Announcement transaction ID TR-92b86c7d-01c9 dated 14/07/2020; for 1.995,63 MT CSPO IP; from SIPEF - PT Umbul Mas Wisesa (RSPO_PO1000001670) as seller to buyer PT IVO MAS TUNGGAL - LUBUK GAUNG (RSPO_PO1000003168). Contract number 2020/LTC-CPO/UMW/24. Contract number 2020/LTC-CPO/UMW/24. Shipping Announcement transaction ID TR-d80b8460-1cad dated 21/12/2020; for 1.482,19 MT CSPO IP; from SIPEF - PT Umbul Mas Wisesa (RSPO_PO1000001670) as seller to buyer PT IVO MAS TUNGGAL - LUBUK GAUNG (RSPO_PO1000003168). Contract number 2020/LTC-CPO/UMW/44. Contract number Shipping Announcement transaction ID TR-527052d4-c1e2 dated 03/09/2020; for 888.48 MT CSPK IP; from SIPEF - PT Umbul Mas Wisesa (RSPO_PO1000001670) as seller to buyer PT IVO MAS TUNGGAL – Lubuk Gaung (RSPO_PO1000006558). Contract number 2020/LTC-PK/UMW/07. 	<p>Complied</p>

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		<ul style="list-style-type: none"> • Shipping Announcement transaction ID TR-4e48e82c-baf2 dated 10/11/2020; for 540,35 MT CSPK IP; from SIPEF - PT Umbul Mas Wisesa as seller to buyer PT IVO MAS TUNGGAL – Lubuk Gaung (RSPO_PO1000006558). Contract number 2020/LTC-PK/UMW/09. <p>PT Umbul Mas Wisesa - UMW POM has done "Remove" in the RSPO IT Platform for CSPO withdrawn as result from transport deduction:</p> <ul style="list-style-type: none"> • Transaction ID: ST-TR-7c57b8f6-37a7; dated 20/01/2021; Product CSPO; Stock Transaction Type: Remove from certified stock; Transaction volume: 1.03 MT. • Transaction ID: ST-TR-cdc0bda2-83a3; dated 21/12/2020; Product CSPO; Stock Transaction Type: Remove from certified stock; Transaction volume: 1.22 MT. • Transaction ID: ST-TR-edeldd17-7528; dated 10/11/2020; Product CSPO; Stock Transaction Type: Remove from certified stock; Transaction volume: 1.06 MT. • Transaction ID: ST-TR-cea1ee89-a85f; dated 08/10/2020; Product CSPO; Stock Transaction Type: Remove from certified stock; Transaction volume: 0.78 MT. • Transaction ID: ST-TR-68aafef8-c997; dated 26/08/2020; Product CSPO; Stock Transaction Type: Remove from certified stock; Transaction volume: 1.29 MT. • Transaction ID: ST-TR-fb2a07a8-f6c1; dated 08/06/2020; Product CSPO; Stock Transaction Type: Remove from certified stock; Transaction volume: 0.69 MT. • Transaction ID: ST-TR-b3a246c1-a8ac; dated 14/05/2020; Product CSPO; Stock Transaction Type: Remove from certified stock; Transaction volume: 0.19 MT. • Transaction ID: ST-TR-45119b46-1a35; dated 09/04/2020; Product CSPO; Stock Transaction Type: Remove from certified stock; Transaction volume: 1.7 MT. 	
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		Total CPO volume removed: 7.96 MT. There is no PK remove from the stock. PT Umbul Mas Wisesa – UMW POM is a palm oil mill, which does not need to confirm any purchase of FFB.	
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 Supply Chain and Traceability of Palm Products (MKT-03-06/04-03-2019/Rev.0) dated 18 March 2019. The mill only makes claims on RSPO Certified product in compliance with RSPO Rules on Market Communications and Claims. Statement of RSPO certified and Identity Preserved are only stated in sales documents of RSPO certified product.	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 principles of the RSPO. Corporate communication is an 'off-product' claim.	PT. Umbul Mas Wisesa is a subsidiary of RSPO registered member, SIPEF Group. SIPEF Group, is highlighting its commitment to the principles of RSPO – therefore making an off product communication. The corporate communication of SIPEF Group can be seen in the corporate website: www.sipef.com .	Complied
4.2	In corporate communications a member is allowed to: <ul style="list-style-type: none"> • 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 SIPEF Group website: <ol style="list-style-type: none"> a. Display its RSPO membership status: No, SIPEF did not display its RSPO membership status. b. Display the RSPO web address: Not in direct manner. SIPEF made a link to RSPO website. c. State the member supports the work of the RSPO: Not in direct manner. In the website, SIPEF wrote "We believe in a landscape approach to new oil palm developments, guided by the methodology endorsed by the RSPO". d. State the member’s history with regards to the RSPO: No. SIPEF did not state their history with regards to the RSPO. Use of RSPO Trademark to promote its membership of the RSPO: No, SIPEF did not use RSPO trademark in its corporate communication such in website.	Complied

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

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	b) If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.		
5.4	A certified member can provide information to its customers detailing the presence of certified palm oil contained within a product even if it is not eligible for a product-specific under RSPO rules. The end product must not be labelled as certified or sold in such a way that implies RSPO certification. For example, a retailer or food service company may require 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.	PT Umbul Mas Wisesa – UMW POM is a Palm Oil Mill that process FFB into CPO and PK. The site sold its product in bulk, no product label attached. Not applicable.	Complied
Business 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.	There is no business to consumer communication as this is an upstream activity certification.	Complied
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.	There is no business to consumer communication as this is an upstream activity certification.	Complied
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.	There is no business to consumer communication as this is an upstream activity certification.	Complied
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	There is no business to consumer communication as this is an upstream activity certification.	Complied
6.5	Members shall not communicate to consumers' information about their suppliers' RSPO membership status.	There is no business to consumer communication as this is an upstream activity certification.	Complied
6.6	Use of the RSPO trademark is restricted to claims about RSPO-certified sustainable palm oil products and it is not authorised for use in relation to any other ingredient.	There is no business to consumer communication as this is an upstream activity certification.	Complied

6.7	Use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorised product-specific claim.	There is no business to consumer communication as this is an upstream activity certification.	Complied
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 .	There is no business to consumer communication as this is an upstream activity certification.	Complied
MODULE A – IDENTITY PRESERVED & SEGREGATED SPECIFIC RULES			
Certified oil palm content (IP)			
	For IP, 95% or above of the oil palm content must be RSPO IP-certified.	The Certified IP volume that can be sold is only the volume requested in the PalmTrace. Hence the CPO volume sold under IP model is considered 100% content.	Complied
	For SG, 95% or above of the oil palm content must be SG, or a combination of SG and IP.	The Certified IP volume that can be sold is only the volume requested in the PalmTrace. Hence the CPO volume sold under IP model is considered 100% content.	Complied
	Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the volume of non-certified	The Certified IP volume that can be sold is only the volume requested in the PalmTrace. Hence the CPO volume sold under IP model is considered 100% content.	Complied

	oil palm products must be covered by the purchase of RSPO Credits of equivalent volume.		
Labelling and trademark (IP)			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> • RSPO trademark which includes the tag 'CERTIFIED' or • RSPO trademark which includes the tag 'This product contains certified sustainable palm oil'. Wherever a RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack. 	There is no product partial claims	Complied
Messaging (IP)			
	<p>Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements:</p> <ul style="list-style-type: none"> • The oil palm products contained in this product have been certified to come from RSPO sources. www.rspo.org • By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: www.rspo.org • RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. www.rspo.org • Certified sustainable oil palm products can be traced back to RSPO-certified mills and plantations. www.rspo.org • The entire supply chain is monitored by independent, RSPO-accredited auditors. www.rspo.org • RSPO-certified sustainable palm oil has been produced to stringent environmental and social criteria. www.rspo.org • References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records. 	There is no product partial claims	Complied
MODULE B – MASS BALANCE SPECIFIC RULES			

Minimum Mass Balance content			
	95% or above of the oil palm content must be RSPO MB-certified.	The Certified IP volume that can be sold is only the volume requested in the PalmTrace. Hence the CPO volume sold under IP model is considered 100% content.	Complied
	Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.	The Certified IP volume that can be sold is only the volume requested in the PalmTrace. Hence the CPO volume sold under IP model is considered 100% content.	Complied
Labelling and trademark (MB)			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> • Surrounded by the text: 'Certified sustainable palm oil'. • 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. 	There is no product partial claims	Complied
Messaging (MB)			

	<p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <ul style="list-style-type: none"> • [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. • 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. <p>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.</p> <p>Messaging NOT ALLOWED in storytelling in product-related communications:</p> <ul style="list-style-type: none"> • Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product. 	<p>There is no product partial claims</p>	<p>Complied</p>
<p>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.</p>			
<p>Criteria 4.1: The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.</p>			
<p>4.1.1</p>	<p>(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.</p>	<p>Unit of Certification has policies related to Human Rights as outlined in Policy No. QMM-40-01-P02 (Human Right Policy) dated 27 March 2019 which stated the company recognizes that Human Rights are universal and apply to all, without any form of distinction. The company supports the implementation of the international of Human Rights, and of the ILO Declaration on Fundamental Principles and Rights at work, as they are transcribed into the laws and regulations of the Republic of Indonesia.</p>	<p>Complied</p>
<p>4.1.2</p>	<p>The unit of certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations.</p>	<p>Unit of Certification employed local residence as workers in their operations. Based on interview with sample of workers and information gathered during stakeholders consultation with local communities of Sei Siarti village, local NGO's, Gender Committee and Workers Union, there is no issues occurred related violence or use any form of harassment since the company operated in 2006.</p>	<p>Complied</p>

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Criteria 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.		
4.2.1	<p>(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.</p>	<p>Unit of Certification has a mechanism of disputes resolve management to all affected parties, which described within:</p> <ul style="list-style-type: none"> a) Land disputes refer to Land and Planting Compensation inside Location Permit of the Company No. LCA 01-01/01-02-2019/Rev 0, dated 18 February 2019. b) Resolution of Internal Complaint refers to the Internal Grievance mechanism (HRD-04-01/01-04-2019/Rev.1) dated 5 April 2019. c) Resolving external complaints refers to the External Grievance mechanism (HRD-04-02/19-02-2019/Rev.0) dated 19 February 2019. d) Whistleblowing policy refers to company policy No. QMM-40-01-P16 (Whistleblowing Policy) dated 14 January 2019. <p>As part of implementation of this system are demonstrate within an internal and external complaint that has been recorded in "Rekaman Keluh Kesah Internal & Eksternal". Sample of record seen as follow: <u>UMW North Estate:</u></p> <ul style="list-style-type: none"> - 11 Feb 2019: Complaint from Foreman related worst of road condition at Block G/H 16 and request for road maintenance. Responded on 13 Feb 2019 by Field Head Assistant. - 13 May 2019: Harvester complaint related condition on Block J15 too weeds and bushes, particular in palm circle and harvesting path. Responded on 15 May 2019 by Field Assistant. <p>Within 2019, there are 8 internal complaints was recorded and have been follow up.</p>
4.2.2	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p>	<p>All SOPs and Company Policies are available in two languages, English and Indonesian, which can be understood by the parties. Based on direct interview during stakeholder consultation with local government of Labuhan Batu Selatan Regency, local NGO's, community representative (Sei Siarti Village), previous land owner and sample of</p>

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		workers, they already understood how the company procedures to resolving disputes, grievance and complaints.	
4.2.3	The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.	<p>Unit of Certification has communicate the grievance procedure, including agreed timeframe and the outcome to the affected parties.</p> <p>Based on direct interview during stakeholder consultation with local government of Labuhan Batu Selatan Regency, local NGO's, community representative (Sei Siarti Village), previous land owner and sample of workers, they already understood how the company procedures to resolving disputes, grievance and complaints.</p> <p><u>Sample of record seen at UMW North Estate:</u></p> <p>Minutes of Socialization on 15 July 2019 at V Mayor Sub-Village. This socialization are consist of handover mechanism and several procedure from Unit of Certification. The mechanism and procedures are:</p> <ul style="list-style-type: none"> - Flow Chart of Grievance Procedure from External Party - List of Publicly Available Documents - Information of Job Vacancy - Whistleblowing Policy 	Complied
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.	<p>Conflict resolution mechanism has established by the unit of certification as per mentioned on Indicator 4.2.1 above.</p> <p>Based on information collected during stakeholder consultation with local government of Labuhan Batu Selatan Regency, local NGO's, community representative (Sei Siarti Village), previous land owner and sample of workers, there was no conflict raised within the certification scope for the last three years.</p>	Complied
Criteria 4.3: The unit of certification contributes to local sustainable development as agreed by local communities.			
4.3.1	Contributions to community development that are based on the results of consultation with local community are demonstrated.	<p>Unit of Certification has a commitment to developed surrounding communities. This can be demonstrated within the annual company program as per "Community Development and Corporate Social Responsibility Program PT. Umbul Mas Wisesa".</p> <p>Based on interview with local community (Sei Siarti Village) and local NGO's, they are stated that company has committed program to improve</p>	Complied

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		<p>the quality of life. Real contribution by the company is road maintenance, both in the main access road outside the plantation and surrounding the villages. Also, the company assist for worship place construction at surrounding communities.</p> <p>According to sample document "Program & Realisasi CD/CSR 2019 Umbul Mas Wisesa South Estate", during 2019 there are 6 types of contribution to local communities that has been distribute. As following:</p> <ol style="list-style-type: none"> 1. Infrastructure (road maintenance, block drain upkeep, premises maintenance). 2. Religion aspect. 3. Sports supporting. 4. Communities Development. 5. Education (charity) 6. Economic & Social (Provision of Clean Water and Charity Orphant). 	
<p>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.</p>			
<p>4.4.1</p>	<p>(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.</p>	<p>Umbul Mas Wisesa POM (PT. Umbul Mas Wisesa) as Certificate Holder has obtained land title for its plantation, under "Hak Guna Usaha (HGU)", in detail:</p> <ol style="list-style-type: none"> 1. "Surat Kepala Kepala BPN No.42/HGU/BPN RI/2013 tentang Pemberian Hak Guna Usaha atas nama PT. Umbul Mas Wisesa atas tanah di Kabupaten Labuhan Batu Selatan dan Labuhan Batu, Provinsi Sumatera Utara dengan luas 6,467.69 Ha" dated 28 May 2013. The HGU valid until 28 May 2048. Then subsequently issued with certificate: <ul style="list-style-type: none"> • "Sertifikat HGU No.51 dengan luas 2,071.11 Ha sesuai dengan Surat Ukur No.287/Tanjung Mulia/2013 tertanggal 10 Juni 2013", dated 10 June 2013. • "Sertifikat HGU No.52 dengan luas 4,396.58 Ha sesuai dengan Surat Ukur No.287/Tanjung Mulia/2013 tertanggal 10 Juni 2013", dated 10 June 2013. 2. "Surat Keputusan BPN No.93/HGU/BPN RI/2014 tentang Pemberian HGU atas nama PT. Umbul Mas Wisesa Atas Tanah di Kabupaten 	<p>Complied</p>

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		<p>Labuhan Batu, Provinsi Sumatera Utara seluas 1,140.99 Ha”, dated 25 June 2014. The permit valid until 25 June 2049. The permit then subsequently issued with certificate:</p> <ul style="list-style-type: none"> • “Sertifikat HGU No.59 seluas 679.09 Ha sesuai dengan Surat Ukur No.494/Labuhan Batu/2014 tertanggal 14 Agustus 2014” dated 29 September 2014; • “Sertifikat HGU No.60 seluas 461.90 Ha sesuai dengan Surat Ukur No.494/Labuhan Batu/2014 tertanggal 14 Agustus 2014”, dated 29 September 2014. <p>3. “Surat Keputusan BPN No.1/HGU/BPN.12/III/2014 tentang Pemberian HGU atas nama PT. Umbul Mas Wisesa Atas Tanah terletak di Kabupaten Labuhan Batu, Provinsi Sumatera Utara seluas 154.67 Ha”, dated 28 March 2014. The permit valid until 28 March 2049. The permit then issued with certificate “Sertifikat HGU No.71 sesuai dengan Surat Ukur No. 493/Labuhan Batu/2014 tertanggal 13 Agustus 2014” dated 5 January 2015.</p> <p>Toton Usaha Mandiri Estate or TUME under PT. Toton Usaha Mandiri (PT. TUM) as supply base of UMW POM, also has land title as follow: “Surat keputusan Kepala BPN No. 23/HGU/BPN RI/2011, tentang Pemberian Hak Guna Usaha atas nama PT. Toton Usaha Mandiri atas Tanah di Kabupaten Labuhan Batu, Provinsi Sumatera Utara seluas 1,198.76 Ha”, dated 26 April 2011. The permit valid until 26 April 2046. The permit then issued with certificate “Sertifikat HGU No.36/2011, sesuai dengan Surat Ukur No.10/Sei Siarti/2011 tertanggal 12 Mei 2011” dated 12 May 2011.</p> <p>During ASA-1.1 2021, Unit of Certification does not have any compensation process to the surrounding community. All of the land tittle are cultivated and managed by PT Umbul Mas Wisesa (Umbul Mas Wisesa POM & its supply bases). PT Umbul Mas Wisesa and PT Toton Usaha Mandiri are taken over companies from previous ownership.</p>	
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		<p>However, unit of certification has had FPIC mechanism related land compensation, which described in Land and Planting Compensation Inside Location Permit Of The Company No. LCA 01-01/01-02-2019/Rev 0, dated 18 February 2019.</p> <p>Based on statement letter from Kepala Badan Planologi No.768/VII-KP/2001, dated 19 March 2001 and Kepala Balai Pemanfaatan Kawasan Hutan Wilayah I Medan, No. S.351/VII/BPKHI-2/2006, dated 18 April 2006, stated that all areas under PT. Umbul Mas Wisesa and PT. Toton Usaha Mandiri management are non-forest designated area (Areal Penggunaan Lain - APL).</p> <p>FPIC process starting from socialization from the company, ground check measurement (survey/mapping) with relevant parties and refer to land statement/title. Land compensation process completed after all the land is clear and clean legally. During the FPIC process, there is no forced by the company, and land compensation agreement is legal, fair and transparent.</p> <p>In other side, during interview with Chief of Tanjung Mulia Village, it is informed that no customary rights/land within PT. Umbul Mas Wisesa. Documents related to the history of land tenure and the actual legal use of the land are kept in Legal Department. At the moment, during ASA 1-1 assessment, unit of certification has no more land compensation process from the certified area. The compensation process already finished since 2012 (prior obtaining Land Title in 2013).</p>	
4.4.2	<p>Copies documents evidencing agreement- making processes and negotiated agreements detailing the FPIC process are available and include:</p> <p>4.4.2a Evidence that a plan has been developed through consultation and discussion held in good faith with all affected groups within the</p>	<p>During ASA-1.1 2021, Unit of Certification does not have any compensation process to the surrounding community. All of the land tittle are cultivated and managed by PT Umbul Mas Wisesa (Umbul Mas Wisesa POM & its supply bases). PT Umbul Mas Wisesa and PT Toton Usaha Mandiri are taken over companies from previous ownership.</p>	Complied

	<p>community, with specific assurances that vulnerable, minority and gender groups are asked for their opinions, and that information has been provided to all affected groups, including in it information about the steps taken to involve them in decision making.</p>	<p>However, unit of certification has had FPIC mechanism related land compensation, which described in Land and Planting Compensation Inside Location Permit Of The Company No. LCA 01-01/01-02-2019/Rev 0, dated 18 February 2019.</p> <p>The unit of Certification have demonstrated across a copy of the agreement that has been agreed upon in the land compensation process. Sample of land compensation negotiated agreement or "Surat Ganti Rugi", as below:</p> <ul style="list-style-type: none"> • Letter of Land Statement No: 593/262/97, dated 16 January 1997. Land owner: Mr. M. F****L, total area 9.6 Ha. Known by District Head and Village Head. • "Surat Ganti Rugi" of Mr. M. F****L, total area 9.6 Ha, dated 10 November 1999, located Sitangkoh Sub-village, Tanjung Mulia village. Acknowledge by Land Owner, Company and Borders Land Owner. Known by District Head and Village Head. <p>FPIC process starting from socialization from the company, ground check measurement with relevant parties and refer to land statement/title. Land compensation process completed after all the land is clear and clean legally. During the FPIC process, there is no forced by the company, and land compensation agreement is legal, fair and transparent.</p>	
	<p>4.4.2b Evidence that the unit of certification has respected communities to give or withhold their consent to the operations at the time that these decisions were taken;</p>	<p>During ASA-1.1 2021, Unit of Certification does not have any compensation process to the surrounding community. All of the land tittle are cultivated and managed by PT Umbul Mas Wisesa (Umbul Mas Wisesa POM & its supply bases). PT Umbul Mas Wisesa and PT Toton Usaha Mandiri are taken over companies from previous ownership.</p> <p>However, unit of certification has had FPIC mechanism related land compensation, which described in Land and Planting Compensation</p>	

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		<p>Inside Location Permit Of The Company No. LCA 01-01/01-02-2019/Rev 0, dated 18 February 2019.</p> <p>FPIC process starting from socialization from the company, ground check measurement (survey/mapping) with relevant parties and refer to land statement/title. Land compensation process completed after all the land is clear and clean legally. During the FPIC process, there is no forced by the company, and land compensation agreement is legal, fair and transparent.</p>	
	<p>4.4.2c Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities. Including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land.</p>	<p>During ASA-1.1 2021, Unit of Certification does not have any compensation process to the surrounding community. All of the land tittle are cultivated and managed by PT Umbul Mas Wisesa (Umbul Mas Wisesa POM & its supply bases). PT Umbul Mas Wisesa and PT Toton Usaha Mandiri are taken over companies from previous ownership.</p> <p>However, unit of certification has had FPIC mechanism related land compensation, which described in Land and Planting Compensation Inside Location Permit Of The Company No. LCA 01-01/01-02-2019/Rev 0, dated 18 February 2019.</p> <p>FPIC process starting from socialization from the company, ground check measurement (survey/mapping) with relevant parties and refer to land statement/title. Land compensation process completed after all the land is clear and clean legally. During the FPIC process, there is no forced by the company, and land compensation agreement is legal, fair and transparent.</p>	
<p>4.4.3</p>	<p>(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).</p>	<p>During ASA-1.1 2021, Unit of Certification does not have any compensation process to the surrounding community. All of the land tittle are cultivated and managed by PT Umbul Mas Wisesa (Umbul Mas Wisesa POM & its supply bases). PT Umbul Mas Wisesa and PT Toton Usaha Mandiri are taken over companies from previous ownership.</p>	<p>Complied</p>

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		<p>However, unit of certification has had FPIC mechanism related land compensation, which described in Land and Planting Compensation Inside Location Permit Of The Company No. LCA 01-01/01-02-2019/Rev 0, dated 18 February 2019.</p> <p>FPIC process starting from socialization from the company, ground check measurement (survey/mapping) with relevant parties and refer to land statement/title. Land compensation process completed after all the land is clear and clean legally. During the FPIC process, there is no forced by the company, and land compensation agreement is legal, fair and transparent.</p>	
4.4.4	<p>All relevant information is available in appropriate forms and languages, including assessment of impact, proposed benefit sharing, and legal arrangements.</p>	<p>During ASA-1.1 2021, Unit of Certification does not have any compensation process to the surrounding community. All of the land tittle are cultivated and managed by PT Umbul Mas Wisesa (Umbul Mas Wisesa POM & its supply bases). PT Umbul Mas Wisesa and PT Toton Usaha Mandiri are taken over companies from previous ownership.</p> <p>However, unit of certification has had FPIC mechanism related land compensation, which described in Land and Planting Compensation Inside Location Permit Of The Company No. LCA 01-01/01-02-2019/Rev 0, dated 18 February 2019.</p> <p>FPIC process starting from socialization from the company, ground check measurement (survey/mapping) with relevant parties and refer to land statement/title. Land compensation process completed after all the land is clear and clean legally. During the FPIC process, there is no forced by the company, and land compensation agreement is legal, fair and transparent.</p>	Complied

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4.4.5	<p>(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.</p>	<p>During ASA-1.1 2021, Unit of Certification does not have any compensation process to the surrounding community. All of the land tittle are cultivated and managed by PT Umbul Mas Wisesa (Umbul Mas Wisesa POM & its supply bases). PT Umbul Mas Wisesa and PT Toton Usaha Mandiri are taken over companies from previous ownership.</p> <p>However, unit of certification has had FPIC mechanism related land compensation, which described in Land and Planting Compensation Inside Location Permit Of The Company No. LCA 01-01/01-02-2019/Rev 0, dated 18 February 2019.</p> <p>FPIC process starting from socialization from the company, ground check measurement (survey/mapping) with relevant parties and refer to land statement/title. Land compensation process completed after all the land is clear and clean legally. During the FPIC process, there is no forced by the company, and land compensation agreement is legal, fair and transparent.</p>	Complied
4.4.6	<p>There is evidence that implementation of agreement negotiated through FPIC is annually reviewed in consultation with affected parties.</p>	<p>During ASA-1.1 2021, Unit of Certification does not have any compensation process to the surrounding community. All of the land tittle are cultivated and managed by PT Umbul Mas Wisesa (Umbul Mas Wisesa POM & its supply bases). PT Umbul Mas Wisesa and PT Toton Usaha Mandiri are taken over companies from previous ownership.</p> <p>However, unit of certification has had FPIC mechanism related land compensation, which described in Land and Planting Compensation Inside Location Permit Of The Company No. LCA 01-01/01-02-2019/Rev 0, dated 18 February 2019.</p> <p>FPIC process starting from socialization from the company, ground check measurement (survey/mapping) with relevant parties and refer to land statement/title. Land compensation process completed after all the</p>	Complied

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		land is clear and clean legally. During the FPIC process, there is no forced by the company, and land compensation agreement is legal, fair and transparent.	
<p>Criteria 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.</p>			
4.5.1	<p>(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.</p>	<p>During ASA-1.1 2021, unit of certification has no land expansion, new planting or land compensation process from the certified area. The compensation process already finished since 2012 (prior obtaining Land Title in 2013).</p> <p>FPIC process starting from socialization from the company, ground check measurement (survey/mapping) with relevant parties and refer to land statement/title. Land compensation process completed after all the land is clear and clean legally. During the FPIC process, there is no forced by the company, and land compensation agreement is legal, fair and transparent.</p> <p>However, unit of certification has had FPIC mechanism related land compensation, which described in Land and Planting Compensation Inside Location Permit Of The Company No. LCA 01-01/01-02-2019/Rev 0, dated 18 February 2019.</p>	Complied
4.5.2	<p>(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.</p>	<p>During ASA-1.1 2021, unit of certification has no land expansion, new planting or land compensation process from the certified area. The compensation process already finished since 2012 (prior obtaining Land Title in 2013).</p> <p>Currently, during ASA 1-1, unit of certification has no land extension or land compensation process from the certified area. The compensation process already finished since 2012 (prior obtaining Land Title in 2013). Unit of Certification has obtaining Land Title as mentioned in Indicator 4.4.1 above.</p>	Complied

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		<p>FPIC process starting from socialization from the company, ground check measurement (survey/mapping) with relevant parties and refer to land statement/title. Land compensation process completed after all the land is clear and clean legally. During the FPIC process, there is no forced by the company, and land compensation agreement is legal, fair and transparent.</p> <p>However, unit of certification has had FPIC mechanism related land compensation, which described in Land and Planting Compensation Inside Location Permit Of The Company No. LCA 01-01/01-02-2019/Rev 0, dated 18 February 2019.</p>	
4.5.3	<p>Evidence is available that affected local peoples understand they have the right to say 'agree' or 'not agree' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p>	<p>During ASA-1.1 2021, unit of certification has no land expansion, new planting or land compensation process from the certified area. The compensation process already finished since 2012 (prior obtaining Land Title in 2013).</p> <p>Currently, during ASA 1-1, unit of certification has no land extension or land compensation process from the certified area. The compensation process already finished since 2012 (prior obtaining Land Title in 2013). Unit of Certification has obtaining Land Title as mentioned in Indicator 4.4.1 above.</p> <p>FPIC process starting from socialization from the company, ground check measurement (survey/mapping) with relevant parties and refer to land statement/title. Land compensation process completed after all the land is clear and clean legally. During the FPIC process, there is no forced by the company, and land compensation agreement is legal, fair and transparent.</p> <p>However, unit of certification has had FPIC mechanism related land compensation, which described in Land and Planting Compensation</p>	Complied

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		<p>Inside Location Permit Of The Company No. LCA 01-01/01-02-2019/Rev 0, dated 18 February 2019.</p>	
<p>4.5.4</p>	<p>To ensure local food and water security and as part of the FPIC process, SEIA participation and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of land allocations process.</p>	<p>During ASA-1.1 2021, unit of certification has no land expansion, new planting or land compensation process from the certified area. The compensation process already finished since 2012 (prior obtaining Land Title in 2013).</p> <p>Currently, during ASA 1-1, unit of certification has no land extension or land compensation process from the certified area. The compensation process already finished since 2012 (prior obtaining Land Title in 2013). Unit of Certification has obtaining Land Title as mentioned in Indicator 4.4.1 above.</p> <p>FPIC process starting from socialization from the company, ground check measurement (survey/mapping) with relevant parties and refer to land statement/title. Land compensation process completed after all the land is clear and clean legally. During the FPIC process, there is no forced by the company, and land compensation agreement is legal, fair and transparent.</p> <p>However, unit of certification has had FPIC mechanism related land compensation, which described in Land and Planting Compensation Inside Location Permit Of The Company No. LCA 01-01/01-02-2019/Rev 0, dated 18 February 2019.</p>	<p>Complied</p>
<p>4.5.5</p>	<p>Evidence is available that the affected communities and rights holders have had the option to access information and advice, that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.</p>	<p>During ASA-1.1 2021, unit of certification has no land expansion, new planting or land compensation process from the certified area. The compensation process already finished since 2012 (prior obtaining Land Title in 2013).</p> <p>Currently, during ASA 1-1, unit of certification has no land extension or land compensation process from the certified area. The compensation process already finished since 2012 (prior obtaining Land Title in 2013).</p>	<p>Complied</p>

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		<p>Unit of Certification has obtaining Land Title as mentioned in Indicator 4.4.1 above.</p> <p>FPIC process starting from socialization from the company, ground check measurement (survey/mapping) with relevant parties and refer to land statement/title. Land compensation process completed after all the land is clear and clean legally. During the FPIC process, there is no forced by the company, and land compensation agreement is legal, fair and transparent.</p> <p>However, unit of certification has had FPIC mechanism related land compensation, which described in Land and Planting Compensation Inside Location Permit Of The Company No. LCA 01-01/01-02-2019/Rev 0, dated 18 February 2019.</p>	
4.5.6	<p>Evidence is available that the communities or their representatives gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.</p>	<p>During ASA-1.1 2021, unit of certification has no land expansion, new planting or land compensation process from the certified area. The compensation process already finished since 2012 (prior obtaining Land Title in 2013).</p> <p>Currently, during ASA 1-1, unit of certification has no land extension or land compensation process from the certified area. The compensation process already finished since 2012 (prior obtaining Land Title in 2013). Unit of Certification has obtaining Land Title as mentioned in Indicator 4.4.1 above.</p> <p>FPIC process starting from socialization from the company, ground check measurement (survey/mapping) with relevant parties and refer to land statement/title. Land compensation process completed after all the land is clear and clean legally. During the FPIC process, there is no forced by the company, and land compensation agreement is legal, fair and transparent.</p>	Complied

		However, unit of certification has had FPIC mechanism related land compensation, which described in Land and Planting Compensation Inside Location Permit Of The Company No. LCA 01-01/01-02-2019/Rev 0, dated 18 February 2019.	
4.5.7	After 15 November 2018, new lands will not be acquired for plantations and mills as a result of recent (after November 2005) expropriations in the national interest (eminent domain) without FPIC process, except in cases of smallholders benefitting from agrarian reform or anti-drug programmes.	<p>During ASA-1.1 2021, unit of certification has no land expansion, new planting or land compensation process from the certified area. The compensation process already finished since 2012 (prior obtaining Land Title in 2013).</p> <p>UMW South Estate: There is no new acquired land for plantation after 15 November 2018.</p> <p>UMW North Estate: There is no new acquired land for plantation after 15 November 2018.</p> <p>TUM Estate: There is no new acquired land for plantation after 15 November 2018.</p> <p>UMW POM There is no new acquired land for mill after 15 November 2018.</p>	Complied
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation.	<p>During ASA-1.1 2021, unit of certification has no land expansion, new planting or land compensation process from the certified area. The compensation process already finished since 2012 (prior obtaining Land Title in 2013).</p> <p>UMW South Estate: There is no new land acquired land in areas inhabited by community in voluntary isolation.</p> <p>UMW North Estate: There is no new land acquired land in areas inhabited by community in voluntary isolation.</p>	Complied

		<p>TUM Estate: There is no new land acquired land in areas inhabited by community in voluntary isolation.</p>	
<p>Criteria 4.6: Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.</p>			
<p>4.6.1</p>	<p>(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.</p>	<p>A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is covers within Land and Planting Compensation Inside Location Permit Of The Company No. LCA 01-01/01-02-2019/Rev 0, dated 18 February 2019.</p> <p>During ASA-1.1 2021, unit of certification has no land expansion, new planting or land compensation process from the certified area. The compensation process already finished since 2012 (prior obtaining Land Title in 2013).</p> <p>FPIC process starting from socialization from the company, ground check measurement (survey/mapping) with relevant parties and refer to land statement/title. Land compensation process completed after all the land is clear and clean legally. During the FPIC process, there is no forced by the company, and land compensation agreement is legal, fair and transparent.</p> <p>However, unit of certification has had FPIC mechanism related land compensation, which described in Land and Planting Compensation Inside Location Permit Of The Company No. LCA 01-01/01-02-2019/Rev 0, dated 18 February 2019.</p> <p>In other side, during interview with Chief of Sei Siarti Village, it is informed that no customary rights/land within PT. Umbul Mas Wisesa.</p>	<p>Complied</p>

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<p>4.6.2</p>	<p>(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.</p>	<p>A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is covers within Land and Planting Compensation Inside Location Permit Of The Company No. LCA 01-01/01-02-2019/Rev 0, dated 18 February 2019.</p> <p>During ASA-1.1 2021, unit of certification has no land expansion, new planting or land compensation process from the certified area. The compensation process already finished since 2012 (prior obtaining Land Title in 2013).</p> <p>FPIC process starting from socialization from the company, ground check measurement (survey/mapping) with relevant parties and refer to land statement/title. Land compensation process completed after all the land is clear and clean legally. During the FPIC process, there is no forced by the company, and land compensation agreement is legal, fair and transparent.</p> <p>However, unit of certification has had FPIC mechanism related land compensation, which described in Land and Planting Compensation Inside Location Permit Of The Company No. LCA 01-01/01-02-2019/Rev 0, dated 18 February 2019.</p> <p>In other side, during interview with Chief of Sei Siarti Village, it is informed that no customary rights/land within PT. Umbul Mas Wisesa.</p>	<p>Complied</p>
<p>4.6.3</p>	<p>Evidence is available that equal opportunities are provided to both men and women to hold land titles for smallholdings (if possible based on local law, customs and/or agreement).</p>	<p>A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is covers within Land and Planting Compensation Inside Location Permit Of The Company No. LCA 01-01/01-02-2019/Rev 0, dated 18 February 2019.</p> <p>During ASA-1.1 2021, unit of certification has no land expansion, new planting or land compensation process from the certified area. The</p>	<p>Complied</p>

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		<p>compensation process already finished since 2012 (prior obtaining Land Title in 2013).</p> <p>Based on direct interview with sample of previous landowner (Mr. IS and Mr. BD), which represent Umbul Mas North Estate and South Estate, it was informed that land compensation through FPIC mechanism in period 2007 – 2008. FPIC process starting from socialization from the company, ground check measurement (survey/mapping) with relevant parties and refer to land statement/title. Land compensation process completed after all the land is clear and clean legally. During the FPIC process, there is no forced by the company, and land compensation agreement is legal, fair and transparent.</p> <p>However, unit of certification has had FPIC mechanism related land compensation, which described in Land and Planting Compensation Inside Location Permit Of The Company No. LCA 01-01/01-02-2019/Rev 0, dated 18 February 2019.</p>	
4.6.4	<p>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.</p>	<p>A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is covers within Land and Planting Compensation Inside Location Permit Of The Company No. LCA 01-01/01-02-2019/Rev 0, dated 18 February 2019.</p> <p>During ASA-1.1 2021, unit of certification has no land expansion, new planting or land compensation process from the certified area. The compensation process already finished since 2012 (prior obtaining Land Title in 2013).</p> <p>Based on interview with sample of previous landowner (Mr. IS and Mr. BD), which represent Umbul Mas North Estate and South Estate, it was informed that land compensation through FPIC mechanism in period 2007 – 2008. FPIC process starting from socialization from the company,</p>	Complied

		<p>ground check measurement (survey/mapping) with relevant parties and refer to land statement/title. Land compensation process completed after all the land is clear and clean legally. During the FPIC process, there is no forced by the company, and land compensation agreement is legal, fair and transparent.</p> <p>However, unit of certification has had FPIC mechanism related land compensation, which described in Land and Planting Compensation Inside Location Permit Of The Company No. LCA 01-01/01-02-2019/Rev 0, dated 18 February 2019.</p> <p>In other side, during interview with Chief of Sei Siarti Village, it is informed that no customary rights/land within PT. Umbul Mas Wisesa.</p>	
<p>Criteria 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.</p>			
4.7.1	<p>(C) A mutually agreed procedure for identifying people entitled to compensation is in place.</p>	<p>A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is covers within Land and Planting Compensation Inside Location Permit Of The Company No. LCA 01-01/01-02-2019/Rev 0, dated 18 February 2019.</p> <p>During ASA-1.1 2021, unit of certification has no land expansion, new planting or land compensation process from the certified area. The compensation process already finished since 2012 (prior obtaining Land Title in 2013).</p> <p>Based on interview with sample of previous landowner (Mr. IS and Mr. BD), which represent Umbul Mas North Estate and South Estate, it was informed that land compensation through FPIC mechanism in period 2007 – 2008. FPIC process starting from socialization from the company, ground check measurement (survey/mapping) with relevant parties and refer to land statement/title. Land compensation process completed</p>	Complied

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		<p>after all the land is clear and clean legally. During the FPIC process, there is no forced by the company, and land compensation agreement is legal, fair and transparent.</p> <p>However, unit of certification has had FPIC mechanism related land compensation, which described in Land and Planting Compensation Inside Location Permit Of The Company No. LCA 01-01/01-02-2019/Rev 0, dated 18 February 2019.</p> <p>In other side, during interview with Chief of Sei Siarti Village, it is informed that no customary rights/land within PT. Umbul Mas Wisesa.</p>	
4.7.2	<p>(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.</p>	<p>A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is covers within Land and Planting Compensation Inside Location Permit Of The Company No. LCA 01-01/01-02-2019/Rev 0, dated 18 February 2019.</p> <p>During ASA-1.1 2021, unit of certification has no land expansion, new planting or land compensation process from the certified area. The compensation process already finished since 2012 (prior obtaining Land Title in 2013).</p> <p>Based on interview with sample of previous landowner (Mr. IS and Mr. BD), which represent Umbul Mas North Estate and South Estate, it was informed that land compensation through FPIC mechanism in period 2007 – 2008. FPIC process starting from socialization from the company, ground check measurement (survey/mapping) with relevant parties and refer to land statement/title. Land compensation process completed after all the land is clear and clean legally. During the FPIC process, there is no forced by the company, and land compensation agreement is legal, fair and transparent.</p>	Complied

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		<p>However, unit of certification has had FPIC mechanism related land compensation, which described in Land and Planting Compensation Inside Location Permit Of The Company No. LCA 01-01/01-02-2019/Rev 0, dated 18 February 2019.</p> <p>In other side, during interview with Chief of Sei Siarti Village, it is informed that no customary rights/land within PT. Umbul Mas Wisesa.</p>	
4.7.3	<p>Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.</p>	<p>A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is covers within Land and Planting Compensation Inside Location Permit Of The Company No. LCA 01-01/01-02-2019/Rev 0, dated 18 February 2019.</p> <p>During ASA-1.1 2021, unit of certification has no land expansion, new planting or land compensation process from the certified area. The compensation process already finished since 2012 (prior obtaining Land Title in 2013).</p> <p>Based on interview with sample of previous landowner (Mr. IS and Mr. BD), which represent Umbul Mas North Estate and South Estate, it was informed that land compensation through FPIC mechanism in period 2007 – 2008. FPIC process starting from socialization from the company, ground check measurement (survey/mapping) with relevant parties and refer to land statement/title. Land compensation process completed after all the land is clear and clean legally. During the FPIC process, there is no forced by the company, and land compensation agreement is legal, fair and transparent.</p> <p>However, unit of certification has had FPIC mechanism related land compensation, which described in Land and Planting Compensation Inside Location Permit Of The Company No. LCA 01-01/01-02-2019/Rev 0, dated 18 February 2019.</p>	Complied

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		<p>In other side, during interview with Chief of Sei Siarti Village, it is informed that no customary rights/land within PT. Umbul Mas Wisesa.</p>	
<p>Criteria 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrated that they have legal customary, or user rights.</p>			
<p>4.8.1</p>	<p>Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC.</p>	<p>During ASA-1.1 2021, unit of certification has no land extension or land compensation process from the certified area. The compensation process already finished since 2012 (prior obtaining Land Title in 2013).</p> <p>Unit of Certification has had legal landuse right to managed and operate the lands.</p> <p>According to information gathered during stakeholder consultation with local NGO's namely "Jaringan Pendamping Kebijakan Pembangunan Desa (JPKP) Kabupaten Labuhanbatu Selatan", informed that since PT Umbul Mas Wisesa managed by SIPEF Group, land disputes is absence for last 5 years.</p> <p>FPIC process starting from socialization from the company, ground check measurement (survey/mapping) with relevant parties and refer to land statement/title. Land compensation process completed after all the land is clear and clean legally. During the FPIC process, there is no forced by the company, and land compensation agreement is legal, fair and transparent.</p> <p>However, unit of certification has had FPIC mechanism related land compensation, which described in Land and Planting Compensation Inside Location Permit Of The Company No. LCA 01-01/01-02-2019/Rev 0, dated 18 February 2019.</p> <p>Information gathered during interview with Head of Sei Siarti Village and relevant statutory bodies, land conflict or land disputes within unit of certification is absence.</p>	<p>Complied</p>

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<p>4.8.2</p>	<p>(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.</p>	<p>During ASA-1.1 2021, unit of certification has no land extension or land compensation process from the certified area. The compensation process already finished since 2012 (prior obtaining Land Title in 2013).</p> <p>Unit of Certification has had legal landuse right to managed and operate the lands.</p> <p>According to information gathered during stakeholder consultation with local NGO's namely "Jaringan Pendamping Kebijakan Pembangunan Desa (JPKP) Kabupaten Labuhanbatu Selatan", informed that since PT Umbul Mas Wisesa managed by SIPEF Group, land disputes is absence for last 5 years.</p> <p>FPIC process starting from socialization from the company, ground check measurement (survey/mapping) with relevant parties and refer to land statement/title. Land compensation process completed after all the land is clear and clean legally. During the FPIC process, there is no forced by the company, and land compensation agreement is legal, fair and transparent.</p> <p>However, unit of certification has had FPIC mechanism related land compensation, which described in Land and Planting Compensation Inside Location Permit Of The Company No. LCA 01-01/01-02-2019/Rev 0, dated 18 February 2019.</p> <p>Information gathered during interview with Head of Sei Siarti Village and relevant statutory bodies, land conflict or land disputes within unit of certification is absence.</p>	<p>Complied</p>
<p>4.8.3</p>	<p>Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use</p>	<p>During ASA-1.1 2021, unit of certification has no land extension or land compensation process from the certified area. The compensation process already finished since 2012 (prior obtaining Land Title in 2013).</p>	<p>Complied</p>

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	<p>rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4).</p>	<p>Unit of Certification has had legal landuse right to managed and operate the lands.</p> <p>According to information gathered during stakeholder consultation with local NGO's namely "Jaringan Pendamping Kebijakan Pembangunan Desa (JPKP) Kabupaten Labuhanbatu Selatan", informed that since PT Umbul Mas Wisesa managed by SIPEF Group, land disputes is absence for last 5 years.</p> <p>FPIC process starting from socialization from the company, ground check measurement (survey/mapping) with relevant parties and refer to land statement/title. Land compensation process completed after all the land is clear and clean legally. During the FPIC process, there is no forced by the company, and land compensation agreement is legal, fair and transparent.</p> <p>However, unit of certification has had FPIC mechanism related land compensation, which described in Land and Planting Compensation Inside Location Permit Of The Company No. LCA 01-01/01-02-2019/Rev 0, dated 18 February 2019.</p> <p>Information gathered during interview with Head of Sei Siarti Village and relevant statutory bodies, land conflict or land disputes within unit of certification is absence.</p>	
4.8.4	<p>For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable).</p>	<p>During ASA-1.1 2021, unit of certification has no land extension or land compensation process from the certified area. The compensation process already finished since 2012 (prior obtaining Land Title in 2013).</p> <p>Unit of Certification has had legal landuse right to managed and operate the lands.</p>	Complied

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		<p>According to information gathered during stakeholder consultation with local NGO's namely "Jaringan Pendamping Kebijakan Pembangunan Desa (JPKP) Kabupaten Labuhanbatu Selatan", informed that since PT Umbul Mas Wisesa managed by SIPEF Group, land disputes is absence for last 5 years.</p> <p>FPIC process starting from socialization from the company, ground check measurement (survey/mapping) with relevant parties and refer to land statement/title. Land compensation process completed after all the land is clear and clean legally. During the FPIC process, there is no forced by the company, and land compensation agreement is legal, fair and transparent.</p> <p>However, unit of certification has had FPIC mechanism related land compensation, which described in Land and Planting Compensation Inside Location Permit Of The Company No. LCA 01-01/01-02-2019/Rev 0, dated 18 February 2019.</p> <p>Information gathered during interview with Head of Sei Siarti Village and relevant statutory bodies, land conflict or land disputes within unit of certification is absence.</p>	
<p>Principle 5: Support smallholder inclusion</p>			
<p>Include smallholders in RSPO supply chains and improve their livelihoods through fair and transparent partnerships.</p>			
<p>Criteria 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.</p>			
<p>5.1.1</p>	<p>Current and previous period prices for FFB are publicly available and accessible by smallholders.</p>	<p>FFB prices in North Sumatra province is publicly available through Plantation Agency website http://disbun.sumutprov.go.id/harga_komoditi/. Also, UMW POM is transparent to set and inform the FFB prices for KSU Suka Makmur, a certified independent smallholders that cooperate with the Unit of Certification.</p>	<p>Complied</p>

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		<p>Based on website, FFB price for period 23 December 2020 - 05 January 2021 is IDR 2,173.10/kg. UMWM POM giving FFB prices is IDR 2,243.10/kg</p> <p>FFB price then disseminate to smallholders by Smallholder Support Team by display it in the announcement board in front of KSU Suka Makmur Office. Based on circular from KSU Suka Makmur No.001/SE/KSUSM/I/2017, if there is question regarding FFB price, members can contact chairman of KSU Suka Makmur through phone number 085261601648.</p>	
5.1.2	(C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.	<p>Information on FFB prices from UMWM POM to KSU Suka Makmur through an official email via Smallholder support staff. The price will installed in KSU Suka Makmur information board,, if there is any changes of prices will informed by phone immediately.</p> <p>Email from HO to RMO cc to Smallholder support (Zulhamri), then smallholder support disseminate to smallholder through announcement board. The Smallholder which supply FFB to UMW POM, KSU Suka Makmur, has a documented guidance for FFB price information. The guidance is "Pedoman Kerja Informasi Harga Tandan Buah Segar" (KSU-SM/PK/019 dated 12 Dec 2019. The document stated that Field Assistant Smallholder communicate FFB price information for one week period to chairman of KSU Suka Makmur directly or via phone. Chairman of KSU Suka Makmur then inform the FFB price to the members by writing it on the announcement board in front of the KSU office.</p>	Complied
5.1.3	(C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.	<p>Fair pricing, including premium pricing when applicable are agreed with members of KSU Suka Makmur as smallholder as evident in Contract agreement between PT Umbul Mas Wisesa and Koperasi Serba Usaha Suka Makmur, "Perjanjian Kemitraan Usaha Tentang Jual Beli Tandan Buah Segar Kelapa Sawit" dated 1 Nov 2017.</p>	Complied

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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 repayments through FFB price reductions for replanting and/or, other support mechanisms where applicable.	There are only 6 female of 31 smallholders members of KSU Suka Makmur cooperative. Decision making of any changes in smallholders contracts are responsible of each smallholders. Contract agreement are signed by all Cooperative KSU Suka Makmur member, including women, as examples: Tanti Wahyuni, Juniawati, Juriah and Mariati. The contract has include Terms and conditions of Cooperative members; Legality of Land; FFB quality; Training and Fertilizer Supports; FFB Transport and Weighing and FFB Prices and Payments.	Complied
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe.	Contract agreement between PT Umbul Mas Wisesa and Koperasi Serba Usaha Suka Makmur are fair, legal and transparent, as evident in "Perjanjian Kemitraan Usaha Tentang Jual Beli Tandan Buah Segar Kelapa Sawit" dated 1 Nov 2017. Article 1: Scope of Agreement; Article 2: Terms and conditions of Cooperative members; Article 3: Legality of Land; Article 4: FFB quality; Article 5: Training and Fertilizer Supports; Article 6: FFB Transport and Weighing; Article 7: FFB Prices and Payments; Article 8: Function of Cooperative; Article 9: Contract period; Article 10: Grievance resolution; Article 11: Force Majeure; Article 12: Others.	Complied
5.1.6	(C) Agreed payments are made in a timely manner and receipts specifying price, weigh, deductions and amount paid are given.	Payment documents: Bank Payment Voucher (IDR); No. BV19110017, dated 22 December 2020; A/C 11280021 Bank Mandiri; B/A 107-00-1035442-3. Beneficiary Name: Koperasi Serba Usaha Suka Makmur Beneficiary Bank: Mandiri Amount: IDR 8,453,359.	Complied

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		Transfer to Lusiano Handoko: 2,167 kg x 2,173.10= Rp 4,709,108 Less Fertilizer Deduction from Lusiano Handoko: (Rp 323,546); Less Deduction from Lusiano Handoko: (Rp 4,385,562); Transfer to Girsang: 1,921 kg x 2,173.10= Rp 2,574,140; Less Fertilizer Deduction from Girsang: (Rp 323,546); Less Deduction from Girsang: (Rp 3,420,705);	
5.1.7	Weighing equipment is verified by an independent third party on a regular basis.	Weighbridge are verified by government agency in annual basis. Latest certificate of verification was observed for weighbridge in UMW POM, issued by "UPTD Metrologi Legal Dinas Perindustrian dan Perdagangan Kabupaten Labuhanbatu", as follows: Certificate of Calibration No.510.3/141/DagInd-Met/KHP/10/2020 dated 20 Oct 2020; for Avery Weight Tronix; type E1205; S/N 122350678; maximum capacity 40,000 kg; valid until 20 Oct 2021.	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.	The unit of certification has support Koperasi Serba Usaha Suka Makmur to be RSPO certified based on certificate number RSPO 687965 by BSI, dated 5 Apr 2018. The unit of certification has formed a Smallholder Support team to help the smallholder get the certificate and maintained the RSPO implementation.	Complied
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.	It was available procedure External Grievance (HRA-04-02/01-02-2018/Rev.0) as guidance for external grievance management process including smallholders. Complainants can submit their complaints via email at http://www.tolantiga.co.id or directly to the respective person. Person whom directly supervises the complainants should discuss with the complainants to solve the issue. Timeframe for resolving grievance is 30 days. It was evident grievance documentation under "Rekaman Keluh Kesah Internal & Eksternal". For example: from DPD LSM Pijar Kab. Labuhanbatu Raya on 30 Jul 2019 through letter No.044/DPD-LSM PIJAR/LR/VII/2019; has been resolved by management on 29 Aug 2019 by conducted meeting and dissemination regarding the grievance.	Complied
Criteria 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess	There are only 6 female of 31 smallholders members of KSU Suka Makmur cooperative and some of them lives far from their plots (±	Complied

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	their needs for support to improve their livelihoods and their interest in RSPO certification.	3hours). UMWM POM as unit of certification is always involve the smallholders to assess their needs for support to improve their livelihoods and their interest through the training or awareness program by smallholders staff. Women and other partners as supply base of the certification unit are involved during assessment of the needs for support to develop the smallholder cooperative. As evidence these names are include in agreement document, Tanti Wahyuni, Juniawati, Juriah and Mariati. The contract has include Terms and conditions of Cooperative members; Legality of Land; FFB quality; Training and Fertilizer Supports; FFB Transport and Weighing and FFB Prices and Payments.	
5.2.2	The unit of certification develops and implements livelihood improvement programmes, including at least capacity building to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder).	The unit of certification has implemented livelihood improvement programmes of Smallholders in surrounding communities. PT Agro Muko are supporting the Koperasi Serba Usaha Suka Makmur in achieving RSPO certificate. The unit of certification provides technical guidance, financial credit, fertilizer support and receiving the FFB production from smallholder around the company. Currently PT Umbul Mas Wisesa has assisted KSU Suka Makmur in achieving RSPO certificate.	Complied
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	The unit of certification has support Koperasi Serba Usaha Suka Makmur to be RSPO certified based on certificate number RSPO 687965 by BSI, dated 5 Apr 2018. The unit of certification has formed a Smallholder Support team to help the smallholder get the certificate and maintained the RSPO implementation.	Complied
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	In 2020 there is no training or awareness conducted for smallholders, particularly in pesticide handling. This is caused by Covid19 pandemic and government announcement that required of limitation of activities for collecting people. Training of pesticide handling to the smallholders has been done on 16 Dec 2019. Pesticide applicator in smallholder area are: Suriadi Nasution, Doni P. Siregar, Sahril, Ahmad Jainuddin and Muliadi.	Complied

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5.2.5	<p>The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.</p>	<p>UMWM POM as unit of certification are made regularly reviews and submit the report within Plantation Activities Report of "Laporan Kegiatan Usaha Perkebunan (LKUP)" that submit to plantation agency of regency level. Within the report also describes performance of smallholders, mostly in actual production, fertilizer use and agrochemical use.</p> <p>The unit of certification regularly review and reported the progress of plantation including Smallholders to the relevant stakeholder. The Unit of certification can demonstrated "Laporan Kegiatan Perkebunan Besar Swasta" for period July to December 2019. The report has been distributed to "Dinas Perkebunan Provinsi Sumatera Utara" on 18 Jan 2020 based letter No.11/UMWS-Inst/I/2020 and to "Dinas Perkebunan Kabupaten Labuhanbatu Selatan" on 18 Jan 2020 based letter No.10/UMWS-Inst/I/2020. The report contain information of Smallholders area consist of Koperasi Serba Usaha (KSU) Suka Makmur, 60.15 Ha and Koperasi Tani Mulia Jaya. The report also described Production, Sales, Fertilizer applied, Agrochemical used and Labour used.</p> <p>Sample of Smallholder progress (KSU Suka Makmur):</p> <table border="1" data-bbox="1131 1037 1971 1388"> <thead> <tr> <th>Delivery Date</th> <th>Nett Weight (kg)</th> <th>Price (Rp/kg)</th> <th>Bruto</th> <th>Fertilizer Deduction (Rp)</th> <th>Net Pay (Rp)</th> </tr> </thead> <tbody> <tr> <td>05/12/2019</td> <td>5,831</td> <td>1,540</td> <td>8,979,740</td> <td>340,950</td> <td>8.638,790</td> </tr> <tr> <td>09/12/2019</td> <td>4,782</td> <td>1,540</td> <td>7,364,280</td> <td>842,109</td> <td>6,522,171</td> </tr> <tr> <td>15/12/2019</td> <td>6,425</td> <td>1,600</td> <td>10,280,000</td> <td>592,715</td> <td>9,687,285</td> </tr> <tr> <td>17/12/2019</td> <td>5,881</td> <td>1,630</td> <td>9,586,030</td> <td>852,373</td> <td>8,733,657</td> </tr> <tr> <td>19/12/2019</td> <td>2,792</td> <td>1,630</td> <td>4,550,960</td> <td>1,068,201</td> <td>3,482,759</td> </tr> <tr> <td>24/12/2019</td> <td>4,970</td> <td>1,670</td> <td>8,299,900</td> <td>744,845</td> <td>7,555,055</td> </tr> <tr> <td>26/12/2019</td> <td>3,465</td> <td>1,670</td> <td>5,786,550</td> <td>714,142</td> <td>5,072,408</td> </tr> <tr> <td>Total</td> <td>34,146</td> <td></td> <td>54,847,460</td> <td>5,155,335</td> <td>49,692,125</td> </tr> </tbody> </table>	Delivery Date	Nett Weight (kg)	Price (Rp/kg)	Bruto	Fertilizer Deduction (Rp)	Net Pay (Rp)	05/12/2019	5,831	1,540	8,979,740	340,950	8.638,790	09/12/2019	4,782	1,540	7,364,280	842,109	6,522,171	15/12/2019	6,425	1,600	10,280,000	592,715	9,687,285	17/12/2019	5,881	1,630	9,586,030	852,373	8,733,657	19/12/2019	2,792	1,630	4,550,960	1,068,201	3,482,759	24/12/2019	4,970	1,670	8,299,900	744,845	7,555,055	26/12/2019	3,465	1,670	5,786,550	714,142	5,072,408	Total	34,146		54,847,460	5,155,335	49,692,125	Complied
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<p>Principle 6: respect workers' rights and conditions Protect workers' rights and ensure safe and decent working conditions.</p>			
<p>Criteria 6.1: Any form of discrimination is prohibited.</p>			
6.1.1	<p>(C) A publicly available non-discrimination and equal opportunity policy is implemented in such way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.</p>	<p>Unit of Certification has a policy to provide equal opportunities and training to obtain employment opportunities that are approved in the "Equal Employment Opportunity Policy" (QMM-40-01-P04) dated 27 March 2019. The Equal Employment Opportunity Policy is also regulated in the Human Resources Department Manual signed by Management on 8 April 2019. The document has regulates equal opportunity without discrimination (Non-Discrimination) based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age starting from the recruitment process, recruitment, transfer, promotion, training, renewal, employment and remuneration.</p>	Complied
6.1.2	<p>(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.</p>	<p>Evidence of non-discrimination and equal opportunities policy which implemented by unit of certification as per employees database per 31 December 2020 as follow:</p> <p>UMWN Estate: Local employees (25 persons); Migrant/Outsider (287 persons); Male (253 persons); Female (65 persons); Permanent-Daily/SKU-H (249 persons); Permanent-Monthly/SKU-B (40 persons); Specified Labour/PKWT (23 persons).</p> <p>TUM Estate: Local employees (15 persons); Migrant/Outsider (127 persons); Male (114 persons); Female (28 persons); Permanent-Daily/SKU-H (112 persons); Permanent-Monthly/SKU-B (20 persons); Specified Labour/PKWT (10 persons).</p>	Complied
6.1.3	<p>The unit of certification demonstrates that the recruitment selection, hiring access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p>	<p>Unit of certification has a policy to provide equal opportunity and treatment for employment as stated in the "Equal Employment Opportunity Policy" (QMM-40-01-P04) dated 27 March 2019. The Equal</p>	Complied

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		<p>Employment Opportunity Policy is also regulated in the "Human Resources Department Manual" signed by Management on 8 April 2019. The document has set equal opportunity without discrimination (Non-discrimination) based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age starting from the recruitment process, permanent employment, transfer, promotion, training, workforce assessment, and remuneration.</p> <p>Sample of workers promotion in Umbul Mas Wisesa North Estate which are based on skills, as per Memorandum No: 95/UMWN/RMO-NS/X/2020, dated 19 October 2020 is totally 3 workers. Completed with supporting document such as Worker performance evaluation or "Penilaian Karyawan" from Contracted workers (PKWT) promoted to Permanent Worker (SKU-H), name Mr. D**I W.Z, position: Kindergarten Teacher. Length of work: 3 years.</p>	
6.1.4	Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.	Based on interview with three (3) female workers during spraying activities at Block K13a, Division 2,. It is clearly informed that pregnancy testing are conducted in monthly basis for all female workers, without any discrimination treatment.	Complied
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.	<p>Each unit of certification already has Gender Committee structure to ensure that no violation or harassment for male and female workers. Structure of gender committee consist of company representative (Operation Unit Manager), Representative of Workers Union, Representative of Employees (Male and Female).</p> <p>In 2020 there is no training or awareness conducted from Gender Committee. This is caused by Covid19 pandemic and government announcement that required of limitation of activities for collecting people.</p>	Complied

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		<p>Based on interview with representative of Gender Committee at UMW North Estate, company concern to giving opportunities and improvements for women. It is proved that company employed Female Field Assistant in two division.</p> <p>According to workers database record at UMWN Estate: Local employees (25 persons); Migrant/Outsider (287 persons); Male (253 persons); Female (65 persons); Permanent-Daily/SKU-H (249 persons); Permanent-Monthly/SKU-B (40 persons); Specified Labour/PKWT (23 persons).</p> <p>TUM Estate: Local employees (15 persons); Migrant/Outsider (127 persons); Male (114 persons); Female (28 persons); Permanent-Daily/SKU-H (112 persons); Permanent-Monthly/SKU-B (20 persons); Specified Labour/PKWT (10 persons).</p>	
6.1.6	There is evidence of equal pay for the same work scope.	<p>For payment, unit of certification applied an applicable regulation related minimum payment in Regency level. Sample of document verified in TUM Estate for period October, November , December 2019 as follow:</p> <p><u>Spraying workers:</u></p> <ul style="list-style-type: none"> - Mrs. Rosdiana Sihombing - Mrs. Nasiati Lahagu - Mr. Rianto Dedi Tampubolon <p><u>Pest & Disease workers:</u></p> <ul style="list-style-type: none"> - Mrs. Safrida - Mr. Idul Fitrianto 	Complied
<p>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).</p>			
6.2.1	(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.	<p>PT. Umbul Mas Wisesa has shown the document of Collective Worker Agreement (PKB) year 2018 – 2020 between PT. Umbul Mas Wisesa and labour union (Pengurus Serikat Pekerja Umbul Mandiri – SPUM) as reference in working regulation. Collective Worker Agreement was</p>	Complied

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		<p>approved by Head of Manpower Agency of Labuhanbatu Selatan (namely Mr. Sutrisno, SH) dated 2 November 2018. Individual contract agreement between company and each worker are available.</p> <p>According to information collected from representative of worker union "Serikat Pekerja Induk PT Umbul Mas Wisesa" during stakeholder consultation, it is informed that:</p> <ul style="list-style-type: none"> • Total union members of PT. Umbul Mas Wisesa are 808 permanent workers (SKU-H and SKU-B). The nature of membership is optional and not coerced. For contract workers (PKWT) and casual daily (FL), they do not become members but are still facilitated if there are labor problems. • Industrial relations between companies and workers are bipartite on the basis of a Collective Labor Agreement (PKB) that has been agreed by both parties. All employment matters refer to the applicable CLA. However, due to the Covid-19 pandemic, both parties agreed to postpone the negotiation on the PKB validity period for up to 1 year. 	
6.2.2	<p>(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.</p>	<p>Sample of employment contracts for contracted workers or "PKWT" that hired in 2020 are:</p> <ol style="list-style-type: none"> 1. Mr. S*****I (Upkeep), dated 31 October 2020; 2. Mr. M*** S*****I (Upkeep), dated 31 October 2019; <p>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.) already described within the contracts. Other conditions are refer to applicable Collective Working Agreement or "Perjanjian Kerja Bersama (PKB)", which has been approved by Manpower Agency.</p>	Complied
6.2.3	<p>(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave,</p>	<p>As per Indonesia legal labour requirements refer to Manpower Act No. 13 Year 2013, regular working hours divided into two types, i.e: 7 hours/day or 40 hours/week (6 working days) and 8 hours/day or 40</p>	Complied

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	<p>reasons for dismissal, period of notice, and other legal labour requirements.</p>	<p>hours/week (5 working days). Unit of certification applied 6 working days, which is 7 hours/day. For overtime, unit of certification applying calculation as per Ministry of Manpower Decree "SK Menakertrans No: KEP-102/MEN/VI/2004", as below: (Nett income per month + price of primary food/rice per month) : 173 Daily working days: 1st hour of overtime will paid 1.5 x wage per hour. Next hour of overtime will be paid 2 time per hour. Working on holiday (6 working days): First of 7 hours will be paid twice. Hour 8 will be paid 3 times; Hour 9 to 10 will be paid 4 times. Evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements, already stated clearly within Collaborative Working Agreements or "Perjanjian Kerja Bersama" period 2018-2020.</p>	
<p>6.2.4</p>	<p>(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.</p>	<p>In early 2021, there is no changes of adequate facilities for the workers that provided by Unit of Certification. Unit of Certification have provided adequate facilities for their workers. According to database from sample of unit which verified, as follow: List of General facility in UMW POM updated in January 2021, such as: – Housing (58 units), – Water filtration (1 unit), – Polyclinic (1 unit), – Mosque (1 unit), – Sports facilities (volley ball, futsal, football), elementary school and ambulance (1 unit), – Electricity and – Clean water. UMW - South Estate, List of general facility year 2021, such as: – Housing G-2 (161 units),</p>	<p>Complied</p>

		<ul style="list-style-type: none"> - Water filtration (3 units), - Polyclinic (1 unit), - Mosque (1 unit), - Church (1 units), - Employee hall (1 unit), - Sports facilities (volley ball, table tennis, futsal, football), elementary school (1 unit), - Junior and Senior high school (1 unit), - Ambulance (1 unit), - Electricity by PLN - Clean water, - Incinerator (1 unit). <p>TUM Estate and UMW – North Estate, The list of general facilities year 2021, i.e:</p> <ul style="list-style-type: none"> - Housing (72 units), - Mosque (1 units), - Church (1 unit), - Dindergarten (1 unit), - Bus for school (1 unit), - Sport facilities (football, volley ball), - Incinerator (1 unit). <p>Based on field visit at housing complex at Umbul Mas North Estate and Toton Usaha Mandiri Estate, those facilities is well maintained and adequate, particularly on water filtration as water supplies.</p>	
6.2.5	The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.	<p>In early 2021, there is no changes of adequate and affordable food for the workers that provided by Unit of Certification.</p> <p>Unit of Certification provide installation of water treatment with Reverse Osmosis System for water filtration that used or consume by workers in compound. The water treatment installation developed due to plantation</p>	Complied

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		<p>is located in peat soil area. Total water treatment Reverse Osmosis System installed in UMW North Estate is 2 units covers 311 workers. For Affordable food, workers from UMW North Estate goes to traditional market of Sei Toras every Thursday, with 10 km distance from workers compound. Also, unit of certification provide mini market with cooperative management located in UMW South Estate (7 km).</p>	
<p>6.2.6</p>	<p>A DLW is paid to all workers in accordance with applicable regulations, including workers who work on a piece rate/quota basis, the calculation of which is based on a quota that can be achieved during regular working hours.</p>	<p>Unit of Certification has prepared the prevailing wage calculation. The company referred to RSPO Guidance for Implementing Decent Living Wage. Company have taken into calculation the component:</p> <ul style="list-style-type: none"> • Reference family size (incl. Total Fertility Rate/TFR and Child Mortality Rate/CMR – Indonesia year 2020); • Full time equivalent per Family (incl. Labor Force Participation Rate/LFPR, Unemployment rate, People Working Part Time – Indonesia year 2019); • Food cost (with 2,100 calories, footnote 19 RSPO Guidance on Implementing DLW) and noted company provided in kind benefit, rice; • Housing cost (provided by company); • Non Food Non Housing cost (electricity, clean water, medical treatment, education, school children transportation cost – provided by company); • Mandatory deduction (from tax and BPJS levy); <p>Sample of DLW calculation at UMW South Estate and TUM Estate as follow: Minimum Wage of Labuhanbatu Selatan Regency in 2020 is IDR 2,930,970.12. Gross Living Wage at IDR.3,590,730; Prevailing wage at IDR. 4,021,880; Gap at IDR.431,150 (positive);</p>	<p>Complied</p>

<p>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:</p> <ol style="list-style-type: none"> 1. Payment of minimum wages in accordance with applicable regulations 2. Assessment of wages paid (prevailing wages) and in-kind benefits. <p>Once the DLW benchmark is available, this procedural note is no longer applicable.</p>			
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	There is no casual worker works at the unit of certification. All workers have status of permanent workers (SKU-B or SKU-H) of contracted worker (PKWT). PKWT is only applicable for probation period. Gradually the status of PKWT has been upgraded to be Permanent Workers (SKU-H), as evidence: Memorandum from Human Resource Department No: 227/JWB-RMONS/X/2019, dated 4 October 2019. Memorandum related approval of workers promotion and grade level promotion at Umbul Mas Wisesa South Estate. Details of Memo is two PKWT workers promoted became permanent workers (SKU-H) and 26 workers for grade level promotion. Based on interview with representative of Worker Union, it was informed clearly that certificate holder employed permanent workers for all core work performed, such as Harvester, FFB Loader, Manuring and several Pesticide applicator. There is only two type of worker status at the company, Permanent workers (daily or monthly basis) and contracted workers (PKWT).	Complied
<p>Criteria 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.</p>			
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 demonstrably implemented.	The unit of certification has a policy related to freedom of association set in Policy No. QMM-40-01-P13 (Freedom of Association Policy) dated 1 March 2014. The policy stated that "the company recognizes the role of lawful and independent workers and employees representative organizations in creating a constructive working environment".	Complied

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		<p>Unit of Certification implement two type of union, Independent Labour/Worker Union (Serikat Pekerja Mandiri) and Bipartite Organisation. Umbul Mas Wisesa POM and South Estate using Bipartite Organisation, however in UMW North Estate and TUM Estate using Independent Labour Union.</p> <p>Based on information gathered during stakeholder consultation with Manpower Agency of Labuhanbatu Selatan, it was informed that both union (Labour union and Bipartite organisation) has been officially registered.</p> <p>According to information collected from representative of worker union "Serikat Pekerja Induk PT Umbul Mas Wisesa" during stakeholder consultation, it is informed that:</p> <ul style="list-style-type: none"> • Total union members of PT. Umbul Mas Wisesa are 808 permanent workers (SKU-H and SKU-B). The nature of membership is optional and not coerced. For contract workers (PKWT) and casual daily (FL), they do not become members but are still facilitated if there are labor problems. • Industrial relations between companies and workers are bipartite on the basis of a Collective Labor Agreement (PKB) that has been agreed by both parties. All employment matters refer to the applicable CLA. However, due to the Covid-19 pandemic, both parties agreed to postpone the negotiation on the PKB validity period for up to 1 year. 	
6.3.2	<p>Minutes of meetings between the unit of certification with trade unions or worker representatives who are freely elected, are documented in the national languages and available upon request.</p>	<p>In 2020 there is no meeting conducted by worker union or "Serikat Pekerja Mandiri". This is caused by Covid19 pandemic and government announcement that required of limitation of activities for collecting people.</p> <p>The latest meeting was conducted in January 2021 to discuss additional cost/premium for harvesters/workers that worked in holiday/Sunday when necessary.</p>	Complied

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		<p>UMW North Estate: Last meeting of LKS Bipartit conducted on 23 December 2019. Topic to be discussed during the meeting are :</p> <ul style="list-style-type: none"> - Arrangement to proceed Driving License to all workers. - Cooperative Payment - Medical Insurance (BPJS Kesehatan) for workers that have new family member. - Food provision for transport workers. - Meeting with Workers Union conducted in monthly basis. 	
6.3.3	<p>Management does not interfere with the formation or operation of registered labour organizations/unions, or other freely elected representatives for all workers, including migrant and contract workers.</p>	<p>According to information collected from representative of worker union "Serikat Pekerja Induk PT Umbul Mas Wisesa" during stakeholder consultation, it is informed that total union members of PT. Umbul Mas Wisesa are 808 permanent workers (SKU-H and SKU-B). The nature of membership is optional and not coerced. For contract workers (PKWT) and casual daily (FL), they do not become members but are still facilitated if there are labor problems.</p> <p>Based on interview with representative of Worker Union (Serikat Pekerja Umbul Mandiri) at UMW North Estate, membership of worker union is optional and freely chosen. However, all permanent workers at UMW North Estate already registered to Union. If contracted workers or "PKWT" have an issue related employment, union can also receive and facilitate the issues with the company.</p>	Complied
Criteria 6.4: Children are not employed or exploited.			
6.4.1	<p>A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.</p>	<p>Unit of certification has a policy on the Prohibition of Child Labor as outlined in the company's "Child Labor Policy" dated 27 March 2019. The policy stated that "PT. Umbul Mas Wisesa is committed not to employ children under 18 years of age, and anything related to work, supports the laws of the Republic of Indonesia and other agreements including the 1999 ILO Child Labor Convention".</p>	Complied

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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.	<p>Based on verification of job vacancy announcement documents as well as job application requirements data, it shows that each applicant file must attach a copy of National Identity Card (KTP) to verify data of age and citizenship status.</p> <p>Sample of List Workers Database at UMW POM and UMW North Estate, period January 2020 as follow:</p> <ul style="list-style-type: none"> • Mr. A**** T*** (Kernel Plant Helper). Born: 20 Sep 1994, Join to work: 1 Apr 2014 (age 20 y.o). Current age: 26 y.o. • Mr. S***** (Harvester). Born: 3 Jun 1990, Join to work: 1 Apr 2014 (age 24 y.o). Current age: 30 y.o. 	Complied
6.4.3	(C) Young person maybe employed only for non-hazardous work with protective restrictions in place for that work.	<p>As outlined in indicator 6.4.1, The unit of certification has a policy on the Prohibition of Child Labor as outlined in the company's "Child Labor Policy" dated 27 March 2019. The policy stated that "PT. Umbul Mas Wisesa is committed not to employ children under 18 years of age, and anything related to work, supports the laws of the Republic of Indonesia and other agreements including the 1999 ILO Child Labor Convention".</p> <p>Based on verification of worker documents for period December 2020 in each unit (Estate and Mill), there are no workers who are less than 18 year old when hired as workers or worked at hazardous area.</p>	Complied
6.4.4	The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.	<p>According to information collected from representative of worker union "Serikat Pekerja Induk PT Umbul Mas Wisesa", local NGO's and workers in field during stakeholder consultation, showed that they have understood company policies to prohibit the use of child labour in all types of company operational activities.</p> <p>Based on document verification, shows that the unit of certification has disseminated the policy prohibiting the use of child labor through:</p> <ol style="list-style-type: none"> 1. Post the policy on the bulletin board in each estate/mill office 	Complied

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		<p>2. Conducting verbal dissemination to workers, especially types of work which are vulnerable to use "informal workers" such as in the harvesting.</p> <p>3. Include a clause of prohibiting the use of child labor in each contract document with the contractor.</p>	
Criteria 6.5: There is no harassment or abuse in the workplace, and reproductive 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.	Unit of certification has a policy on prevention of sexual harassment/ violence as outlined in policy No. QMM-40-01-P10, Rev 1 (Sexual Harassment Policy) dated 27 March 2019. Based on interview with sample of female workers and Gender Committee representative, it is clearly that they have understood the company's policies on prevention of sexual harassment.	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.	The unit of certification has a policy on protection of reproductive rights as outlined in policy No. QMM-40-01-P11, Rev 1 (Protection of Reproductive Rights Policy) dated 27 March 2019. Based on interview with sample of female workers and Gender Committee representative, it is clearly that company are respectful on protection of reproductive rights. In example, female workers who has children are given to breastfeeding time for 30-45 minutes every day.	Complied
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.	Based on interview with sample of female workers and Gender Committee representative, it is clearly that company are respectful on protection of reproductive rights. In example, female workers who has children are given to breastfeeding time for 30-45 minutes every day.	Complied
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.	Based on direct interview with sample of female workers and Gender Committee, they already understood how the company procedures to resolving disputes, grievance and complaints. Anonymity and complainants are protected as requested by them.	Complied
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: <ul style="list-style-type: none"> Retention of identity documents or passports; 	Based on interview with workers and workers union, stated that the unit of certification does not practiced such thing as follows:	Complied

	<ul style="list-style-type: none"> • Payment of recruitment fees; • Contract substitution without worker’s consent • Involuntary overtime; • Lack of freedom of workers to resign • 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 • Debt bondage • Withholding of wages 	<ul style="list-style-type: none"> • Retention of identity documents or passports • Payment of recruitment fees • Contract substitution • Involuntary overtime • Lack of freedom of workers to resign • Penalty for termination of employment • Debt bondage • Withholding of wages 	
6.6.2	<p>(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.</p>	<p>Based on direct interview with workers and representative of labour union, it is informed that unit of certification are employed local workers, resident of surrounding villages (Tanjung Mulia villagers and Sei Siarti villagers) and Indonesian citizen from other regencies or provincial. There is no migrant workers and only two type of working status, permanent (SKU-H/B) and contracted workers (PKWT)</p>	Complied
<p>Criteria 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.</p>			
6.7.1	<p>(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 at these meetings, and any issues raised are recorded.</p>	<p>PT Umbul Mas Wisesa – UMW POM has appointed the responsible person(s) for OHS is identified, aslo for records of regular meetings between the responsible person(s) and workers has demonstrated.</p> <p>Data verified:</p> <ul style="list-style-type: none"> • UMW POM - OHS committee (P2K3) has registered to Manpower Agency as per “Surat Keputusan Kepala UPT Pengawasan Ketenagakerjaan Wilayah IV Dinas Tenaga Kerja Provinsi Sumatera Utara Nomor: 313-7/P2K3/WIL-IV/DTK/SU/2018 tentang Surat Keputusan Kelapa Dinas Tentang Pembentukan Panitia Keselamatan dan Kesehatan Kerja (P2K3) di Perusahaan, dated 8th November 2018. • Namely Mr Ayudha Rezky, certificate number: KEP.31194/NAKER-BINWASK3/X/2018 tentang Penunjukan Ahli Keselamatan dan Kesehatan Kerja Umum Menteri Tenaga Ketenagakerjaan, issued 	Complied

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		<p>by Ministry of Manpower of Republic of Indonesia, dated 12th October 2018 – valid until 3 years</p>	
<p>6.7.2</p>	<p>Accident and emergency procedures in Indonesian language are in place and clearly understood by all workers. Assigned operatives trained in first aid are present in both field and other operations. First aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p>	<p>PT Umbul Mas Wisesa – UMW POM has prepared the procedure of accident and emergency as per document of Incident Report, No: OHS-01-08, issued date 4th February 2019 version 0.</p> <p>Steps to Report Incidents:</p> <ol style="list-style-type: none"> 1. Applies to all accidents, diseases and incidents that occur in the PT TTI environment 2. The initial data that must be given if an incident occurs are: <ul style="list-style-type: none"> • Date and time occur • Location of the incidents • Name and or number of victims • Activity at the time of incidents • The is injury or death <p>Procedure of emergency response No: OHS-03-01-2020/Rev.0, possible emergencies include:</p> <ul style="list-style-type: none"> • Natural disasters (floods, earthquakes, storms, volcanoes, etc) • Fire at the mill • Toxic gas leak • Chemicals spills, waste, CPO • Explosion in fuel tank • Civil security disturbances (bomb threats, robberies, demonstrates, riots) • Workplace violence that results in physical injury and trauma <p>UMW POM has assigned operatives trained in First Aid are present in both field and other operations, e.g: namely Mr Mislán Sembiring (license number: 007/Naker/P3K/2020) dated 7th August 2020 – valid</p>	<p>Complied</p>

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		<p>until 3 years and Mikra Sanda Pranata (license number: 008/Naker/P3K/2020 - dated 7th August 2020 – valid until 3 years</p> <p>Record verifications:</p> <ul style="list-style-type: none"> • In 2020, there was reported an accident i.e: report number 001-UMWM/01-2020-08-AC-WP, dated 1st August 2020, korban Mr Suwandani (technician in workshop mill). Chronology: karena miscommunication during the maintenance fuel sehingga terjadi kecelakaan dengan luka pada bagian bokong ybs. • Fire Drill simulation dated 10 February 2020 – was attended by all workers in UMW POM (86 workers). Evidences: scenario, documentation of implementation and evaluation – recommendation 	
6.7.3	<p>(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.</p>	<p>PT. Umbul Mas Wisesa – UMW POM have provided training related to OHS and PPE in accordance with the result of risk assessment.</p> <p>UMW POM – data verified:</p> <ul style="list-style-type: none"> - Record of handover of PPE (safety shoes) for mill workers for Mr Jefry Nasution (foremane in processing – dated 26th September 2020), Mr Zainul Irfan (engine room OP – dated 26th September 2020) - Record of handover of PPE (earmuff), e.g: dated 3rd July 2020 for Mr Zainal (operator in engine room), dated 27th May 2020 for Mr Yusuf Aziz (mill assistant) - Record of handover of PPE (respirator of black color), dated 2nd February 2020 for Mr Resi Imansyah (WTP OP), dated 11th March 2020 for Yosep Napitupulu (WTTTTTP OP) - Checklist on monitoring of PPE use for workers in UMW POM - monthly, e.g: October to December 2020, the result reported OK 	Complied
6.7.4	<p>All workers are provided medical care and covered by accident insurance. Costs incurred from work related incidents, leading to injury or illness, are</p>	<p>PT Umbul Mas Wisesa - UMW POM provide all workers will medical care, and covered by accidents insurance, the statement as mentioned in</p>	Complied

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	covered in accordance with applicable regulations or by the unit of certification if applicable regulations do not provide protection.	<p>Memorandum No: 436/MED-CIR/XII/2015, dated 2nd December 2015 was signed by Company Doctor.</p> <p>Based on interview with sample workers during field visit and consultation with labor union, they were stated all workers in PT Umbul Mas Wisesa and PT Toton Usaha Mandiri are provided with medical care and accident under BPJS Kesehatan and PBJs Ketenagakerjaan.</p> <p>Sample of data verified:</p> <ul style="list-style-type: none"> • UMW POM - payment record of accidents insurance (BPJS Ketenagakerjaan), month December 2020 (payment code: 201202001268), amount paid IDR XX,641,189, covering for 74 workers (all worker in UMW – POM, dated 16th December 2020. Status: PAID • UMW POM - payment record of health insurance (BPJS Kesehatan) for month December 2020, total IDR XX,151,339 was covered for 74 workers (all workers), dated 6th January 2021 – status: PAID. • TUM Estate – payment record of medical insurance (BPJS Kesehatan) for month December 2020, total IDR XX,653,954 was covered for 535 workers, dated 6th January 2021 – status: PAID. 	
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	<p>PT Umbul Mas Wisesa – UMW POM has shown the record of injuries using lost time accident (LTA) metrics as in “Rekapitulasi Kejadian Kecelakaan Kerja PT Umbul Mas Wisesa dan PT Toton Usaha Mandiri – LTA” year 2020.</p> <ul style="list-style-type: none"> • UMW POM, there was no accidents reported since 2020, • UMW South Estate, year 2019 there was no accident reported • UMW North Estate, there was no accidents reported since 2020, • TUM Estate, year 2020 there was no accident reported since 2020. 	Complied
Principle 7: Protect the environment, conserve biodiversity and ensure sustainable management of natural resources.			
Criteria 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.			
7.1.1	(C) IPM plans are implemented and monitored to ensure effective pest control.	Integrated Pest Management plan in UMW South Estate is evident, as titled “Program Pengendalian Hama Terpadu 2021”, established 5 January 2021. Barn owl box in first semester; monitoring on barn owl box on monthly basis; planting of beneficial plant (<i>Turnera subulata</i> and	Complied

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		<p><i>Cassia</i> sp), Nursery and upkeep beneficial plant (<i>Turnera subulatta</i>, <i>Cassia tora</i> and <i>Antigonon leptopus</i>) on monthly basis; identification of beneficial plant available on the field every quarter; pest detection and pest and disease census on monthly basis (4,461.91 Ha); white ant census on monthly basis; <i>Ganoderma</i> monitoring on 6 monthly basis.</p> <p>Realization of 2020 Integrated Pest Management was documented., e.g. release of <i>Sycanus creovitattus</i> in February (2,470 species); March (349 species); April (2,000 species); May (4,162 species); September (156 species) and October (942 species). Monitoring of termite stated that there is no significant termite attack in 2020. Monitoring of <i>Ganoderma</i> in 2nd Semester 2020 stated that there was 3,857 palm (0.608%) infected by <i>Ganoderma</i> during 2020. Map of nettle caterpillar attack period December 2020 stated that there was 2,037.58 Ha (45.67%) of light attack. Nettle caterpillar attack controlled by biological control.</p> <p>Rat are naturally control by barn owl. Monitoring of barn owl period December found that there was 9 cages in Division I, 1 of it was occupied; 11 cages in Division II; 11 cages in Division III, 5 of it are occupied; 10 cages in Division IV; 9 cages in Division V and 9 cages in Division VI. Beneficial plant identification described census result of Nettle Caterpillar natural enemy: <i>Euchanticona</i>, <i>Sycanus</i>, <i>Dolichogenidae</i>, <i>Systropus</i>, <i>Cordyceps</i>; Beneficial Plants: <i>Turnera subulatta</i>, <i>Casia coabnensis</i>, <i>Casia tora</i>, <i>Antigonon leptopus</i>; Beneficial weeds: <i>Nephrolepis</i>, <i>Axonopus</i>, <i>Kretekkan</i>, <i>Pakis Sayur</i>.</p> <p>Integrated Pest Management plan in UMW North Estate is evident, as titled "Program Pengendalian Hama Terpadu 2021", established 5 January 2021. The plan consists of monthly basis activity, e.g. planting of beneficial plant, census of leaf eater caterpillar, termite census, upkeep beneficial plant, <i>Sycanus</i> reproduction, and <i>Sycanus</i> release;</p>	
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		<p>quarterly basis activity, e.g. development and maintenance of barn owl box.</p> <p>Realization of IPM monitoring recorded in "UMW North - Program Pengendalian Hama Terpadu Tahun 2020", e.g. realization of planting beneficial plant 13,514 m in December; leaf eater caterpillar census and termite census are 2,601.22 Ha (12 rounds); upkeep beneficial plant is 16,514 m in December; reproduction of Sycanus is 415 colonies in December and release of Sycanus is 300 species in December; imago trap 25,502 species in December. There is no barn owl box existed. There is indication that barn owl prefers to go to HCV area.</p> <p>Based on summary of caterpillar census UMWN Estate in December 2020, there are light attack of bagworm 44.85 Ha (1.72%); light attack of nettle caterpillar 1,122.12 Ha (43.64%) and light attack of dasychira 1,528.63 Ha (58.77%).</p> <p>Integrated Pest Management plan in TUM Estate is evident, as titled "Program Pengendalian Hama Terpadu 2021", established 5 January 2021. The plan consists of monthly basis activity, e.g. planting of beneficial plant, census of leaf eater caterpillar, termite census, beneficial plant upkeep, Sycanus reproduction, and Sycanus release.</p> <p>Realization of IPM monitoring recorded in "TUM Estate - Program Pengendalian Hama Terpadu Tahun 2020", e.g. realization of planting beneficial plant 6,860 m in December; leaf eater caterpillar and termite census are 1134.95 Ha (12 rounds); upkeep beneficial plant are 2,034 Ha in December; application of Cordyceps is 12,450 Ha in November; reproduction of Sycanus is 408 colonies in December and release of Sycanus is 350 species in December; imago trap 47,274 species in December.</p> <p>Based on summary of caterpillar census TUM Estate in December 2020, there are light attack of bagworm 202.63 Ha (17.85%); light attack of nettle caterpillar 910.29 Ha (80.21%) and light attack of dasychira 471.64 Ha (44.54%).</p>	
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		<p>Appropriate biological controls have been exercised, such as the application of imago traps, reproduction and release of <i>Sycanus</i> and application of Cordyceps.</p> <p>Chemical control are done using Starthene by Trunk Injection method. Trunk Injection only done if the attack level is Medium or Heavy. Medical check-up performed to all Trunk Injection operator in 3-month intervals. Appropriate PPE are used during Trunk Injection.</p> <p>Biological control performed by planting and upkeep beneficial plant. During field visit, it was observed <i>Turnera subulatta</i> planted in most of the collection road or transport road. The unit of certification also carried out breeding of nettle caterpillar natural enemy, <i>Sycanus creovitattus</i>. Auditor visited the breeding location which is at the back of UMWN Estate office. The person in charge can explained very well regarding the breeding process and growth from eggs to instar 5. Records show that <i>Sycanus creovitattus</i> have been released to the field.</p>	
7.1.2	Invasive species are not to be used according to applicable regulation in managed areas, unless plans to prevent and monitor their spread are implemented.	The unit of certification has a list of Global Invasive Species, and evaluate the status of existence in certified area. Some species are naturally exist in the area and the spreading are controlled manually, e.g. <i>Achatina fulica</i> , <i>Ageratum conizoides</i> , <i>Clidemia hirta</i> , <i>Imperata cylindrica</i> , <i>Lantana camara</i> , <i>Mikania micranta</i> and <i>Mimosa pudica</i> . There are no species in the list that used to managed areas in unit of certification.	Complied
7.1.3	There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities.	Based on field visit and document review, there is no use of fire for pest control in whole area of UMW South Estate, UMW North Estate, and TUM Estate.	Complied
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.	The company has recorded list of herbicide used, completed with active ingredient, WHO class, trademark, target, registration number and expiry date.	Complied

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		Trademark	Active Ingredient	WH O Clas s	Target	Registration Number	Expiry date	
		Smart 486 AS	Isopropil amina glifosat 486 g/l	U	Grasses weed	RI.01030119 971313	12/11/2023	
		Basta 150 SL	Amonium glufosinat 150 g/l	III	Grass weed, broad leaf	RI.01030119 921113	12/11/2023	
		Kenlon 480 EC	Triklpir 480 g/l	III	Brush weed/ wood	RI.01030120 062433	12/12/2021	
		Metsulindo 20 WP	Metil metsulfuro n 20%	U	Ferns, Broad Leaf, Sedges	RI.01030119 991484	11/05/2021	
		Garlon Mix 333/17	Aminopirali d potassium 17 g/l	III	<i>Tetracera indica, Melastoma malabatricu m, Clidemia hirta, Lantana camara</i>	RI.01030120 155148	31/01/2025	
		Starthene 75 WDG	Acephate 75%	III	Bagworm, nettle caterpillar	RI.01010120 072983	08/08/2022	
		Regent 50 SC	Fipronil 50 g/L	II	Termite	RI.01010119 951192	26/02/2023	
7.2.2	(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per Ha and number of applications) are provided.	Document "Rekapitulasi Penggunaan Pestisida Tahun 2020" recorded pesticides use including active ingredients, LD50, area treated, amount of active ingredients applied per Ha and per ton FFB. Pesticide use in UMWS Estate in 2019 and 2020:						Complied

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Trademark	LD50 Skin (mg/kg bw)	Volume (L or kg)	
		2019	2020
Metsulindo 20 WP	2000	273.26	322.98
Smart 486 AS	5000	1,947.65	1,303.24
Elang 480 SL	5000	164.00	-
Starthane 75 WG	2000	1,065.17	119.00
Regent 50 SC	2000	15.07	26.19
Trabas 150 SL	593	1,099.10	-
Basta 150 SL	1380	3,596.82	8,579.92
Kenlon	2000	46.50	15.00
Garlon Mix	5000	43.70	-
Copton 0.5 RB	2000	50.61	93.39

Pesticide use in UMWN Estate in 2019 and 2020:

Trademark	LD50 Skin (mg/kg bw)	Volume (L or kg)	
		2019	2020
Smart 486 AS	5000	1,717.37	1,266.82
Elang 480 SL	5000	200.00	-
Ally 20 WDG	2000	217.38	-
Metsulindo 20 WP	2000	175.87	-
Regent 50 EC	2000	194.41	179.16
Garlon 670 EC	5000	94.24	-
Starthane 75 WG	2000	4,323.79	898.10
Basta 150 SL	1380	2,325.62	5,656.07
Becano	2000	1.20	-

Pesticide use in TUM Estate in 2019 and 2020:

Trademark	LD50 Skin (mg/kg bw)	Volume (L or kg)	
		2019	2020
Smart 486 AS	5000	756.68	-

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		<table border="1"> <tr><td>Elang 480 SL</td><td>5000</td><td>130.00</td><td>-</td></tr> <tr><td>Ally 20 WDG</td><td>2000</td><td>20.00</td><td>-</td></tr> <tr><td>Metsulindo 20 WP</td><td>2000</td><td>90.40</td><td>-</td></tr> <tr><td>Regent 50 EC</td><td>2000</td><td>97.35</td><td>99.33</td></tr> <tr><td>Garlon 670 EC</td><td>5000</td><td>202.45</td><td>-</td></tr> <tr><td>Starthene 75 WG</td><td>2000</td><td>3,045.14</td><td>3,737.56</td></tr> <tr><td>Basta 150 SL</td><td>1380</td><td>955.32</td><td>2,209.27</td></tr> <tr><td>Trabas</td><td>593</td><td>402.87</td><td>-</td></tr> <tr><td>Becano</td><td>2000</td><td>1.40</td><td>-</td></tr> </table>	Elang 480 SL	5000	130.00	-	Ally 20 WDG	2000	20.00	-	Metsulindo 20 WP	2000	90.40	-	Regent 50 EC	2000	97.35	99.33	Garlon 670 EC	5000	202.45	-	Starthene 75 WG	2000	3,045.14	3,737.56	Basta 150 SL	1380	955.32	2,209.27	Trabas	593	402.87	-	Becano	2000	1.40	-	
Elang 480 SL	5000	130.00	-																																				
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Trabas	593	402.87	-																																				
Becano	2000	1.40	-																																				
7.2.3	(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.	<p>Use of pesticide are minimized as part of the plan, and in accordance with IPM Plans, there are no pesticide application outside of the targeted species and planned intervals. Pesticide are only use to reduce / eliminate existing pest, which has exceeded the economic threshold.</p> <p>Except the use of Basta 150 SL in 2020 is still high due to there is increase of wide leaf weed, furthermore it also used as herbicide for circle spraying, whilst previously used only for selective spraying.</p>	Complied																																				
7.2.4	There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in Indonesia best practice guidelines.	There is no use of prophylactic use of pesticides throughout PT. Umbul Mas Wisesa. Pesticide/Herbicides are only use to reduce / eliminate existing pest, which has exceeded the economic threshold.	Complied																																				
7.2.5	Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat, are not to be used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks. The due diligence refers to: 7.2.5a Judgment of the threat and verify why this is a major threat.	There is no use of WHO Class 1A or 1B pesticide in whole plantation operation. The use of paraquat has been stopped since 2017. The company's General Manager of North Sumatera has issued Memorandum No.117/GMO-All Estate/XI/2016, dated 1 December 2015. The memorandum stated that the use of paraquat as contact pesticide is not allowed as of 1 January 2017. Target: Zero use of paraquat effective since 1 January 2017.	Complied																																				

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		Based on visit in field operation and agrochemical storage in UMWS, UMWN and TUM Estate, there was no paraquat found. Based on report of "Daftar Pestisida yang digunakan di Tahun 2020" – there were no paraquat was noted in the report.	
	7.2.5b Why there is no other alternative which can be used.	There are no use of pesticide that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, or paraquat in whole operation of unit of certification.	
	7.2.5c Which process was applied to verify why there is no other less hazardous alternative.	There are no use of pesticide that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, or paraquat in whole operation of unit of certification.	
	7.2.5d Process to limit the negative impacts of the application.	There are no use of pesticide that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, or paraquat in whole operation of unit of certification.	
	7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.	There are no use of pesticide that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, or paraquat in whole operation of unit of certification.	
7.2.6	(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.	The unit of certification has provided training for all workers that conducted chemical spraying including for Smallholders (KSU Suka Makmur), as evidence in "Hasil Pelatihan Spraying dan Kalibrasi Alat Semprot" dated 25 Nov 2020 in UMWS Estate. The training was attended by: Estate Manager, Field Head Assistant, all Field Assistant, all Spraying workers and supervisors including that apply spraying in Smallholders. Training module, evaluation result and attendance list were available. Training records available for spraying worker of Division 5 UMWS; Muliadi (Supervisor), Ahmad Jainuddin, Sahrel, Suriadi Nasution, Yirwansyah, Mita Laia, Darwis, Lukman Hakim, M. Idris Nasution and Jaka Supriatna. Except Yuli Saputri was rotated from general upkeep worker starts on 1 January 2021, she has been trained regarding	Complied

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		<p>spraying work on 6 January 2021 by Field Assistant and Supervisor. Training of spraying and chemical handling in UMWN and TUM Estate was conducted on 17 Nov 2020. Training attended by 34 personnel consist of spraying workers, Supervisor, Field Assistant and Field Head Assistant. Training module, evaluation result and attendance list were available.</p> <p>Handover of PPE to spraying worker of UMWN Estate dated 16 Dec 2020, consist of 16 pcs google; 16 pcs rubber hand gloves and 16 pcs Mask N95. Handover of PPE to spraying worker of TUM Estate was available dated 9 Nov 2020, consist of 8 pcs overall and 8 pcs googles; on 12 Dec 2020, consist of 8 rubber hand gloves and 8 pcs N95 Mask. PPE observed during auditor field visit are gumboots, overall; Apron (shift type orange colour); N95 masks; rubber hand gloves blue colour and plastic googles.</p>	
7.2.7	(C) Storage of all pesticides in accordance with recognized best practices.	<p>The storage for all pesticide is in good condition.</p> <p>During ASA 1_1 in January 2021, based on filed visit in storage of pesticides and interview with storage keepers both in UMW POM, UMW South and TUM Estate; there was found the storage for all pesticide is in good condition.</p> <p>A standard storage system appears to be implemented across by the organization. The storage is equipped with sufficient air ventilation to provide air circulation.</p> <p>Hazard signs, emergency shower, secondary containment, spill kit, appropriate PPE (overall, face shield, impermeable rubber gloves, apron and mask) is available and ready for use.</p> <p>Working instruction for pre-mixing, stacking, and storing pesticide is current, MSDS is also readily available. Material Data Safety Sheets (MSDS) are obtained for all chemicals used and are available at the areas</p>	Complied

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		<p>of mixing. These were all seen be controlled by date and were readily available. No concentrates are taken into the field are pre-mixed in designated mixing area.</p>	
<p>7.2.8</p>	<p>All pesticide containers that are disposed of and/or used for other purposes are managed according to applicable regulations and/or instructions on the packaging.</p>	<p>All chemical and their containers from Mill and Estates were collected and kept in temporary waste storage for 180 up to 365 days prior disposal.</p> <p>Review of records showed all hazardous waste has been identified and properly monitored, such as used oil, used oil filter, used batteries, empty chemical container from Estate and Mill activities, contaminated materials, etc. Monitoring was recorded in document "Neraca Limbah B3".</p> <p>Data verified:</p> <ul style="list-style-type: none"> • UMW POM – Permit of limited hazardous waste storage under "Keputusan Kepala Dinas Penanaman Modal dan Pelayanan Perizinan Terpadu Satu Pintu Kabupaten Labuhanbatu Selatan No.503/515/DMPPTSP-LS/2017 tentang Izin Penyimpanan Sementara Limbah Bahan Berbahaya dan Beracun PT. Umbul Mas Wisesa Mill", dated 25 April 2017. The permit valid for 5 years, up to 10 April 2022. • UMW South Estate - Permit of limited hazardous waste storage under "Keputusan Kepala Dinas Penanaman Modal dan Pelayanan Perizinan Terpadu Satu Pintu Kabupaten Labuhanbatu Selatan No.503/514/DMPPTSP-LS/2017 tentang Izin Penyimpanan Sementara Limbah Bahan Berbahaya dan Beracun PT. Umbul Mas Wisesa Estate", dated 25 April 2017. The permit valid for 5 years, up to 10 April 2022. <p>Record of disposal all of pesticides container as per "Berita Acara Serah Terima Barang Limbah Bahahn Berbahaya dan Beracun (B3) – No:</p>	<p>Complied</p>

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		<p>001/UMWM-BAPLB3/I/2021" dated 15th January 2021, delivered to PT Amindy Barakah Sumut, consisted of:</p> <ul style="list-style-type: none"> • Oil used (800 liters) • Fuel filter used (35 kg) • Empty chemical container (282 Kg) • Hazardous waste manifest nomor: AVT 0019269, material name Oil used (800 liters), vehicle BK 9776 MP, transporter name PT Amindy Barakah, dated 15th January 2021 <p>Environmental Performance Report (3 month basis) on handling of hazardous was to Environmental Agency in Labuhanbatu Selatan Regency as per "Laporan Kegiatan Pengelolaan dan Penyimpanan Limbah B3" for period October to December 2020, was submitted on dated 18th January 2021, document number: 04/UMWM-EKS/I/2021</p>	
7.2.9	<p>(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.</p>	<p>There is no aerial application of pesticide in whole operation area of PT Umbul Mas Wisesa and PT Toton Usaha Mandiri.</p>	Complied
7.2.10	<p>(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p>	<p>UMW South Estate – the special annual medical surveillance for pesticides operators was conducted on 11th December 2020. MCU was attended by 128 workers in high risk area, consisted of pesticides applicators, chemical storage keeping, generator (electrical) operator</p> <p>Data verified: "Laporan Hasil Pemeriksaan Kesehatan – Pekerja dengan Resiko Tinggi" (result of medical test has communicated to related workers</p>	Complied
7.2.11	<p>(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.</p>	<p>Based on interview with workers on handling of pesticides, there was no works with pesticides is undertaken by person under the of 18, pregnant or breastfeeding women or other people that have medical restrictions.</p> <p>Data seen:</p>	Complied

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		<ul style="list-style-type: none"> • UMW South Estate - Report of monitoring no pregnant and breastfeeding workers (monthly). In December 2020, there were no indications. E.g: Mrs Mitalaya (chemical applicator), Mrs Armi Damanik (Fertilizer applicator), • UMW South Estate - based on the list of worker on handling of pesticides updated January 2021 – there were persons under the age of 18, the youngest worker is Mrs Ahmad Zainuddin (register number 0351), date of birth 27th February 1994, joined on 1st March 2018 (30 years old). 	
<p>Note For 7.2.11 Referring to Act No. 13 of 2003 concerning Manpower, Act No. 35 of 2014 concerning Child Protection, and taking into account the risks of hazards on palm oil plantations and mills on the development and physical, mental and social health of children, the national interpretation mandates that the unit of certifications does not employ people under the age of 18 for pesticide spraying. For this reason, the provisions of young workers under 18 years in indicator 7.2.11 are irrelevant.</p>			
<p>Criteria 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.</p>			
7.3.1	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented in accordance with applicable laws and regulations.</p>	<p>PT Umbul Mas Wisesa – UMW POM has shown the document of waste management plan is documented in procedure “Pengelolaan Sampah” and “Rencana Pengelolaan Limbah”, last updated on 18th January 2021.</p> <p>Waste management which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, such as:</p> <ul style="list-style-type: none"> • Medical waste, and other type hazardous waste (waste oil, empty chemical container, contaminated material, battery) regulated as per procedure “Penyimpanan Limbah Bahan Berbahaya dan Beracun (Limbah B3) dan Tanggap Darurat”. • Domestic waste, to reduce pollution to the environment. • Organic and inorganic waste sent to landfill and then covered with soil. • The hazardous waste stored in a dedicated storage completed with alarm, spill kit, secondary containmen and PPE for operation. <p>Location of landfill for disposed in-organic waste in UMW South Estate in block C04 in division I</p>	Complied

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<p>7.3.2</p>	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p>	<p>PT Umbul Mas Wisesa – UMW POM has prepared a procedure on disposal of waste material under procedure of “Management of Hazardous and Toxic Water Material” no: ENC 01-10/04-03-2019/Revision 1, dated 18th March 2019.</p> <p>Step of the procedures are:</p> <ul style="list-style-type: none"> • Identification of hazardous waste • Identification of hazardous waste review • Data collection and B3 waste collection • Installation of B3 waste risk and hazard symbols • Review of hazardous waste management B3 • Making contract with carrier (SPK) • Transportation in accordance with SPK • Making a B3 waste management report to the related department <p>Based on interview with PIC in handling of hazardous waste are fully understood in proper disposal of waste material according the procedures.</p> <p>Data verified: Record of disposal all of pesticides container as per “Berita Acara Serah Terima Barang Limbah Bahahn Berbahaya dan Beracun (B3) – No: 01/I/UMWS/2021” dated 14th January 2021, delivered to PT Amindy Barakah Sumut, consisted of:</p> <ul style="list-style-type: none"> • Medical waste (18 kg) • Oil used (800 liters) • Fuel filter used (60 kg) • Empty pesticides containers (446,3 kg) • Toner used (2,3 kg) • Hazardous waste manifest nomor: AVT 0019267, material name: empty pesticides container (quantity: 800 kg), vehicle BK 9767 MB, transporter name PT Amindy Barakah, dated 14th January 2021 	<p>Complied</p>
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		<ul style="list-style-type: none"> Environmental Performance Report (per 3 months base) on handling of hazardous was to Environmental Agency in Labuhanbatu Selatan Regency as per "Laporan Kegiatan Pengelolaan dan Penyimpanan Limbah B3" for period October to December 2020, was submitted on 18th January 2021, document number: 33/UMWS/Isnt/I/2021 	
7.3.3	The unit of certification does not use open fire for waste disposal.	<p>PT Umbul Mas Wisesa - Umbul Mas Wisesa POM prepared the procedure of waste management" as per Standard Operation Procedure on "Pengelolaan Sampah", no: SOP/General/ESD, revision 0) issued date 1st March 2010.</p> <p>In point 6.1.1. mentioned the waste disposal not allowed to used open fire.</p> <p>PT Umbul Mas Wisesa – UMW POM has also shown the document of waste management plan is documented in procedure "Pengelolaan Sampah" and "Rencana Pengelolaan Limbah", last updated on 18rd January 2021. In point 3 was mentioned that the domestic waste disposed to land fill (location in Block C04 division I in UMW South Estate) and disposed incinerator processing (location in block 08K11A, location in UMW North Estate)</p> <p>Data seen: "Program and realization of disposed the domestic waste from emplacement to landfill location, month December 2020 total 89 trip".</p>	Complied
Criteria 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	Good agricultural practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts is documented.	<p>The unit of certification has numbers of procedure for good agriculture practices to maintain soil fertility and minimize environmental impact, as available under SOP:</p> <ol style="list-style-type: none"> OPM-06-01; Inorganic Fertiliser – Pupuk Inorganik. OPM-06-02; Organic Fertiliser – Pupuk Organik OPM-06-03; LSU: Palm Marking – LSU: Penandaan Tanaman. 	Complied

		<p>4. OPM-06-04; Leaf Sampling Unit (LSU) and Rachis Sampling Unit (RSU) – Pengambilan Sampel.</p> <p>Fertilizer are applied to maintain and increase soil fertility, fertilizer applied following the fertilizer recommendation which established based on soil and leaf analysis. Due to Covid-19 pandemic, leaf analysis 2020 postponed to 2021, therefore fertilizer recommendation for 2021 is according to fertilizer recommendation 2020. Available seen on "Oil Palm Fertilizer Recommendation for PT Umbul Mas Wisesa – South Estate 2020", "Oil Palm Fertilizer Recommendation for PT Umbul Mas Wisesa – North Estate 2020" and "Oil Palm Fertilizer Recommendation for PT Toton Usaha Mandiri 2020. Fertilizer application records are documented in "Monthly Manuring Program Sheet". Based on interview, fertilizer application are performed according to the SOP that refer Best Agriculture Practice and minimize the environmental impacts. By using methods correct type, correct target and correct dosage. Application near the drainage are avoided.</p> <p>Sample seen: Progress of upkeep in UMWS Estate January-December 2020:</p> <table border="1"> <thead> <tr> <th>Type of work</th> <th>Division</th> <th>Realization (Ha)</th> </tr> </thead> <tbody> <tr> <td rowspan="7">Circle and Path Spray</td> <td>I</td> <td>2,387.70</td> </tr> <tr> <td>II</td> <td>2,523.24</td> </tr> <tr> <td>III</td> <td>2,156.50</td> </tr> <tr> <td>IV</td> <td>2,160.26</td> </tr> <tr> <td>V</td> <td>2,300.29</td> </tr> <tr> <td>VI</td> <td>2,114.10</td> </tr> <tr> <td>Total</td> <td>13,642.09</td> </tr> <tr> <td rowspan="2">Selective Spraying</td> <td>I</td> <td>522.55</td> </tr> <tr> <td>II</td> <td>463.58</td> </tr> </tbody> </table>	Type of work	Division	Realization (Ha)	Circle and Path Spray	I	2,387.70	II	2,523.24	III	2,156.50	IV	2,160.26	V	2,300.29	VI	2,114.10	Total	13,642.09	Selective Spraying	I	522.55	II	463.58	
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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.	UMW North Estate: Due to Covid-19 pandemic, leaf analysis 2020 postponed to 2021, therefore fertilizer recommendation for 2021 is according to fertilizer recommendation 2020. Last periodical leaf sample analysis conducted in	Complied																																																	

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		<p>February 2019 for preparing fertilizer recommendation 2020. Leaf and Rachis Analysis Report 2019 and fertilizer recommendation 2020 were evident. Leaf Analysis Report was issued by Verdant Bioscience Plant and Soil Nutrition Laboratory with Ref number 18/STC-spl/XI/18, received date 26 Nov 2018, number of samples 96 bags, analysis date 9 Feb 2019, document number PSNL/TTI/I/19/013. Sample seen Lab No.A4558; Sample type-Leaf; Estate: UMWN; Division: UMWNEFD01; Block Code 07G11-12; 60.29 Ha; Material Socfindo; Planting Year 2007; Date Sampled 12 Sep 2018. Analysis Result: 2.38% N; 0.166% P; 0.87% K; 0.33% Mg; 0.77% Ca; 12 ppm B; 5 ppm Cu; and 12 ppm Zn. Sample seen Lab No.A4653; Sample type-Rachis; Estate-UMWN; Division: UMWNEFD05; Block 09H33A; 42.98 Ha; Material SJ1; Plant Year 2009; Date Sampled 3 Nov 2018. Analysis Result: 0.329% P; 2.92% K; 0.24% Mg; and 0.34% Ca.</p> <p>Semi detail soil survey report of PT UMW North and South Estate carried out in June 2010. Total area surveyed is 6,236 ha, the entire area is low lying flat, dominant soil series is <i>Lenggana</i> series and Organic clay/muck (peat soil); <i>Mekar Jaya</i> and <i>Galing</i> series (acid sulphate soil), peat depth is 3 m to > 5 m, potentially acid sulphate layer is within 100 cm.</p> <p>UMW South Estate: Due to Covid-19 pandemic, leaf analysis 2020 postponed to 2021, therefore fertilizer recommendation for 2021 is according to fertilizer recommendation 2020. The last periodical leaf sample analysis conducted in July 2019 for preparing fertilizer recommendation 2020. Leaf and Rachis Analysis Report 2020 and fertilizer recommendation 2020 were evident. Leaf Analysis Report was issued by Verdant Plant and Soil Nutrition Laboratory with Ref number 10/STC-spl/VII/19, received date 11 Jul 2019, number of samples 6 bags, analysis date 25 Jul 2019, document number PSNL/TTI/VII/19/273. Sample seen Lab No.B1442; Sample type-Leaf; Estate-UMWS; Div-I; Block C24-25;</p>	
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		<p>Sampling date 25/06/2019; Material PM 02; Plant Year 2007; 29.86 Ha. Analysis result: 2.27% N; 0.157% P; 1.00% K; 0.26% Mg; 0.65% Ca; 16 ppm B; 3 ppm Cu and 5 ppm Zn. Sample seen Lab No.B1445; Sample type-Rachis; Estate-UMWS; Div-V; Block C24-25; Sampling date 25/06/2019; Material PM 02; Plant Year 2007; 29.86 Ha. Analysis result: 0.36% N; 0.549% P; 2.95% Mg; and 0.21% Ca. UMWS has also done Petiole Cross Section to analyze the wide, depth and rachis length of the palm.</p> <p>TUM Estate: Due to Covid-19 pandemic, leaf analysis 2020 postponed to 2021, therefore fertilizer recommendation for 2021 is according to fertilizer recommendation 2020. Last periodical leaf sample analysis conducted in 26 Nov 2019 for preparing fertilizer recommendation 2020. Leaf and Rachis Analysis Report 2019 and fertilizer recommendation 2020 were evident. Leaf Analysis Report was issued by Verdant Bioscience Plant and Soil Nutrition Laboratory with Ref number 18/STC-spl/XI/18, received date 26 Nov 2018, number of samples 46 bags, analysis date 21 Feb 2019, document number PSQL/TTI/I/19/014. Sample seen Lab No.A4654; Sample type-Leaf; Estate-TUME; Division TUMEEFD02; Block 08K11A; 42.82 Ha; Material Socfindo; Plant Year 2008; Date sampled 29 Sep 2018. Analysis results: 2.76% N; 0.179% P; 0.80% K; 0.38% Mg; 0.55% Ca; 14 ppm B; 5 ppm Cu and 11 ppm Zn. Sample seen Lab No.A4699; Sample type-Rachis; Estate-TUME; Division TUMEEFD01; Block 09M24, 09N09A; 46.60 Ha; Material SJ2; Plant Year 2009; Date sampled 19 Sep 2019; Analysis result: 0.385% P; 2.92% K; 0.26% Mg and 0.31% Ca.</p> <p>Semi detail soil survey report of PT Toton Usaha Mandiri carried out in June 2010. Total area surveyed 1,484 ha, the entire area is low lying flat, dominant soil series is <i>Lenggana</i> series, <i>Typic haplohemist</i>, peat soil), peat depth is 3 meters to > 5 meters.</p>	
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7.4.3	A nutrient recycling strategy is in place, which include the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.	There is no EFB and POME application in PT Umbul Mas Wisesa and Toton Usaha Mandiri, because the location is whole peat.	Complied																																																																
7.4.4	Records of fertilizer inputs are maintained.	<p>Fertilizer recommendation 2020 described the fertilizer need for each Estate. Records of fertilizer inputs are available in "Monthly Manuring Program" for each division and "Rekapitulasi Penggunaan Fertilizer Tahun 2020" for estate recapitulation.</p> <p>Record of fertilizer recommendation and realization in UMWS Estate 2020 are as follow:</p> <table border="1" data-bbox="1131 718 1859 989"> <thead> <tr> <th rowspan="2">Fertilizer Type</th> <th colspan="2">Recommendation (kg)</th> <th rowspan="2">Realization (kg)</th> </tr> <tr> <th>1st Semester</th> <th>2nd Semester</th> </tr> </thead> <tbody> <tr> <td>Borate</td> <td>32,307</td> <td>-</td> <td>32,306</td> </tr> <tr> <td>MOP</td> <td>935,885</td> <td>240,978</td> <td>2,407,365</td> </tr> <tr> <td>Urea</td> <td>983,125</td> <td>-</td> <td>985,376</td> </tr> <tr> <td>ZnSO₄</td> <td>77,329</td> <td>77,329</td> <td>142,091</td> </tr> <tr> <td>Rock Phosphate</td> <td>832,659</td> <td>-</td> <td>832,658</td> </tr> <tr> <td>NPK 15.7.25</td> <td>-</td> <td>2,313,943</td> <td>588,508</td> </tr> </tbody> </table> <p>Record of fertilizer recommendation and realization in UMWN Estate 2020 are as follow:</p> <table border="1" data-bbox="1131 1085 1926 1380"> <thead> <tr> <th rowspan="2">Fertilizer Type</th> <th colspan="2">Recommendation (kg)</th> <th colspan="2">Realization (kg)</th> </tr> <tr> <th>1st Semester</th> <th>2nd Semester</th> <th>1st Semester</th> <th>2nd Semester</th> </tr> </thead> <tbody> <tr> <td>Urea</td> <td>452,200</td> <td>-</td> <td>452,200</td> <td>-</td> </tr> <tr> <td>RP</td> <td>212,437</td> <td>-</td> <td>212,450</td> <td>-</td> </tr> <tr> <td>MOP</td> <td>532,200</td> <td>1,200,900</td> <td>532,200</td> <td>1,200,900</td> </tr> <tr> <td>Borate</td> <td>5,593</td> <td>-</td> <td>5,593</td> <td>-</td> </tr> <tr> <td>Zincop</td> <td>38,025</td> <td>41,904</td> <td>37,973</td> <td>41,904</td> </tr> </tbody> </table>	Fertilizer Type	Recommendation (kg)		Realization (kg)	1 st Semester	2 nd Semester	Borate	32,307	-	32,306	MOP	935,885	240,978	2,407,365	Urea	983,125	-	985,376	ZnSO ₄	77,329	77,329	142,091	Rock Phosphate	832,659	-	832,658	NPK 15.7.25	-	2,313,943	588,508	Fertilizer Type	Recommendation (kg)		Realization (kg)		1 st Semester	2 nd Semester	1 st Semester	2 nd Semester	Urea	452,200	-	452,200	-	RP	212,437	-	212,450	-	MOP	532,200	1,200,900	532,200	1,200,900	Borate	5,593	-	5,593	-	Zincop	38,025	41,904	37,973	41,904	Complied
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<p>Criteria 7.5: Practices minimise and control erosion and degradation of soils.</p>																																															
<p>7.5.1</p>	<p>(C) Maps that identify marginal and fragile soils, including steep sloped land are available.</p>	<p>Based on semi detail soil survey, it was found that mostly the plantation areas is peat soil, Map of peat soil is available in place with scale 1:40,000 print in A2 size. Soil series sources: Shuttle Radar for Topographic Mission (SRTM) 2006; path 57 Row 12, Digital Rupabumi Map scale 1:250,000 BAKORSURTANAL 2004, Field Observation 2010. Projection Tranverse Mercator, grid Universal Tranverse Mercator and Geographic, datum WGS 84, zone 47N. Soil characteristic consist of:</p> <ul style="list-style-type: none"> Lenggana Series (LGN 3,4), <i>Typic haplohemist</i>, mature peat land, 16 – 75 % fibre peat, peat depth 3 – 5 meters, poor drainage, low lying flat (5,681 Ha – 91%). Mekar Jaya (MKJ), <i>Sulfic endoaquept</i>, silty clay, 35-60% clay, poor drainage, depth 50-100cm and Galling (GLG), <i>Typic sulfaquept</i>, depth 50cm, 35-60% clay, low lying flat (464 Ha – 7%). 	<p>Complied</p>																																												

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7.5.2	The replanting of palm oil is not conducted extensively on steep terrain in accordance with applicable regulations.	Based on semi detail soil survey, total area of PT Umbul Mas Wisesa and PT Toton Usaha Mandiri are low lying flat. There is no steep terrain in	Complied

		whole area of certification unit. No extensive replanting of oil palm on steep terrain.	
7.5.3	New palm oil planting is not conducted on steep terrain in accordance with applicable regulations.	Based on semi detail soil survey, total area of PT Umbul Mas Wisesa and PT Toton Usaha Mandiri are low lying flat. There is no steep terrain in whole area of certification unit. There is no new planting performed by unit of certification.	Complied
Criteria 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.			
7.6.1	(C) Evidence of long-term land suitability for oil palm cultivation, soil maps or soil surveys that identify marginal and fragile soils, including steep terrain are available, in planning and operations.	<p>The unit of certification has done identification and analysis of topography and hydrology, as documented in "Laporan Hidrotopografi" issued by Faculty of Agriculture Technology – IPB University on 17 Jan 2012. The document described analysis results of topography and hydrology survey.</p> <p>Based on semi detail soil survey, it was found that mostly the plantation areas is peat soil, Map of peat soil is available in place with scale 1:40,000 print in A2 size. Soil series sources: Shuttle Radar for Topographic Mission (SRTM) 2006; path 57 Row 12, Digital Rupabumi Map scale 1:250,000 BAKORSURTANAL 2004, Field Observation 2010. Projection Transverse Mercator, grid Universal Transverse Mercator and Geographic, datum WGS 84, zone 47N. Soil characteristic consist of:</p> <ul style="list-style-type: none"> • Lenggana Series (LGN 3,4), <i>Typic haplohemist</i>, mature peat land, 16 – 75 % fibre peat, peat depth 3 – 5 meters, poor drainage, low lying flat (5,681 Ha – 91%). • Mekar Jaya (MKJ), <i>Sulfic endoaquept</i>, silty clay, 35-60% clay, poor drainage, depth 50-100cm and Galling (GLG), <i>Typic sulfaquept</i>, depth 50cm, 35-60% clay, low lying flat (464 Ha – 7%). • Organic clay/muck, <i>Typic humaquepts</i> organic clay, high water table during raining days, acid sulphate at within 50 cm, low lying flat (91 Ha – 2%). <p>Soil profile map in PT. Umbul Mas Wisesa and PT Toton Usaha Mandiri was available made on 16 July 2013, sources:</p>	Complied

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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 carried out by the unit of certification.	Complied
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	<p>The unit of certification is able to present map, consist of information related to the soil type and topographic condition of the Estate. Based on identified soil type, the plantation located on peat soil. The unit of certification has done identification and analysis of topography and hydrology, as documented in "Laporan Hidrotopografi" issued by Faculty of Agriculture Technology – IPB University on 17 Jan 2012. The document described analysis results of topography and hydrology survey. Based on semi detail soil survey, it was found that mostly the plantation areas is peat soil, Map of peat soil is available in place with scale 1:40,000 print in A2 size.</p> <p>Soil surveys and topographic information from Agronomy Department has guide the company in planning of drainage, irrigation systems, roads and other infrastructure.</p>	Complied
Criteria 7.7: No new planting on peat, regardless of depth after 15 November 2018 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.	Based on field visit and document review, there is no new planting after 15 November 2018 in UMWS Estate, UMWN Estate and TUM Estate.	Complied
7.7.2	Peat areas within the managed area are inventoried, documented and reported to the RSPO Secretariat (effective from November 15, 2018).	Peat area in UMWS Estate, UMWN Estate and TUM Estate have been inventoried and documented by the unit of certification. Peat Inventory was made based on Guidance on Peat Inventory for RSPO Reporting. Peat Inventory report and boundary map in scale 1:50,000 for reporting	Complied

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		<p>year 2018 were available during audit for PT Umbul Mas Wisesa and PT Toton Usaha Mandiri. Report to RSPO Secretariat has been made on 30 Oct 2019 by email, include attachment RSPO Peat Inventory file, Peat Boundary Map and Peat Bounday SHP file. Acknowledgement of receiving all documents for peat inventory has been made by RSPO GHG Unit on 31 Oct 2019.</p>	
<p>PROCEDURAL NOTE: Maps and other documentation for peatlands are provided, prepared and shared according to the RSPO Working Group (Peatland Working Group / PLWG) audit guide (See Procedural Notes for Indicator 7.7.5 below).</p>			
<p>7.7.3</p>	<p>(C) Subsidence of peat is monitored, documented and minimised.</p>	<p>The unit of certification has a set of procedure for water management for peat soil, in line with Indonesia’s guideline for peat management. Water management procedure for peat land was available and implemented, the company has installed and maintained water gates, main drain gate, main drainage, secondary drainage and collection drainage. Regular maintenance of drainages were evident.</p> <p>Companies have prepared “Work Instruction Water Management PT Umbul Mas Wisesa & PT Toton Usaha Mandiri”. The work instruction has also been prepared to monitor water mangement performance. Monitoring and recording water level and water table in two weeks interval – as well as take immediate action, to open/close water gate accordingly, in order to maintain water level in optimum level. This has been supported by trained supervisor, e.g. Sulistyو at UMW South Estate and Erwin Syahputra at UMW North and TUM Estate.</p> <p>Monitoring of water management by means of regular inspection and recording of water level, piezo meter, peat subsidence level and water gate lever. Record of monitoring were evident. Based on Peat Subsidence Monitoring UMWN Estate 2nd period of 2020, stated that total subsidence since 2014 in Block G13 is 12.9 cm; Block J16A is 12.2 cm; Block N01 is 12.5 cm; Block H22A is 15.67 cm; Block H31 is 14.31 cm; Block H17 is 5.1 and HCV is 12.9 cm. Based on Peat Subsidence Monitoring TUM Estate 2nd period of 2020, stated that total subsidence</p>	<p>Complied</p>

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		<p>since 2014 in Blok L20 is 13.35 cm; Blok L14 is 12.9 cm; Block L11A is 22 cm. All station visited are in good condition and scale are readable. Furthermore, the unit of certification has made improvement in establishing Watergate using calcic board. It was found that water level are maintained in ≤ 40 cm. This procedure following latest regulation, <i>Peraturan Pemerintah No.57 tahun 2016 Perubahan atas Peraturan Pemerintah No.71 tahun 2014 tentang Perlindungan dan Pengelolaan Ekosistem Gambut</i>. Subsidence of peat is monitored, documented and minimized.</p>	
7.7.4	<p>(C) Availability of implementation evidence of the water and land cover management program.</p>	<p>The unit of certification has developed a water management plan, for cultivation of oil palm in peat soil. This document has been cascaded into "Program Kerja Water Management Tahun 2021" dated 5 January 2021, available for each estate. In order to monitor water level at optimum level, company has:</p> <ol style="list-style-type: none"> 1. Installed water gate to control drainage; 112 unit at UMWN; 484 unit at UMWS; 95 unit at TUME. 2. Installed water level pole (near water gate) to monitor water level at two weeks interval; 147 unit at UMWN; 684 unit at UMWS; 56 unit at TUME. 3. Installed piezometer (inside plantation blocks) to monitor the water table at two weeks interval; 29 unit at UMWN; 52 unit at UMWS; 18 unit at TUME. 4. Installed peat subsidence poles, in order to monitor peat subsidence on annual basis; 7 unit at UMWN; 8 unit at UMWS; 3 unit at TUME. <p>The unit of certification has prepared all infrastructure for the palm cultivation in peat area. Started from construction of road network, planting hole-in-hole and drainage network. The unit of certification has prepared drainage system to maintain water level in peat area, comprise of main/primary drain, secondary drain and collection/field drain. The size and configuration (width and depth) of each drain has follow the regulation. The drain network has also been complemented with water</p>	Complied

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		gate infrastructure – taking into consideration the water inlet and water outlet, water level history, as well as topography in landscape level. A yearly report produced to review and evaluate the water management performance for future planning.	
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 oil palm cultivation for at least 40 years or two cycles, (whichever is longer), before reaching the natural gravitational drainage limit for peat. If oil palm is gradually replaced, it is replaced by other commodity crops that are better suited for higher groundwater levels (paludiculture) or rehabilitated with natural vegetation.	The unit of certification was a newly opened plantation with oldest year of planting was 2005, so the replanting plan will be carried out around the year 2030. However, water management has done well, i.e. by making the water gate; water level and water table monitoring (every 2 weeks); monitoring of peat subsidence (annually); monitoring of flood areas by mapping and setting the floodgates/water gate in the area; and in 2017 the company built peat dam to maintain water availability during dry seasons. Based on field observation of peat dam at UMW North Estate, it was in good condition. The unit of certification has established document "Laporan Hidrotopografi" issued by Faculty of Agriculture Technology – IPB University on 17 Jan 2012. The document described analysis results of topography and hydrology survey.	Complied
PROCEDURAL NOTE: For 7.7.5: Detailed information on the RSPO Drainability Assessment Guide along with related concepts and detailed actions is contained in the Guidelines currently being adjusted / tested by the RSPO Working Group on Peatlands (Peatland Working Group / PLWG). The final version must obtain PLWG approval in January 2019 and will include additional Guide on the steps to be followed after deciding not to replant and the consequences for other stakeholders, farmers, local communities, and the unit of certification concerned. It is recommended that the trial methodology period is proposed to be extended for 12 months for all relevant management units (ie management units that have plantations on peat) to utilize the methodology and provide input to PLWG so that existing procedures can be further refined as needed before January 2020. The unit of certification has the option to delay replanting until the issuance of the revised Guidelines for the guidelines. Additional guidance for alternative commodity crops and rehabilitation of natural vegetation will be regulated by the PLWG.			
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).	All existing plantings on peat in UMWS Estate, UMWN Estate and TUM Estate are managed according to the RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2018) which described in SOP Water Management in Peat (OPM-09-01/15-02-2019/Rev.3). Map of piezometer, water level and water gate are available in scale 1:67,500, for example "Point TMAT Pasca Survey". Based on water table monitoring PT Umbul Mas Wisesa 2 nd period of December 2020, stated	Complied

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		<p>that water table monitoring in Block B14 is -40 cm; Block B28 is -20 cm; Block C18 is -37 cm; Block D36 is -6 cm; Block E07 is -40 cm; Block G20 is -39 cm; Block H12 is -40 cm; Block I15 is -40 cm and Block J28 is -40 cm.</p> <p>Based on water level monitoring UMWN Estate 2nd period of December 2020, found that in Block G12 P1 is -24 cm, P2 is -38 cm, P3 is 36 cm, main drain is -29 cm, total is -127 cm, average is -32 cm, action is open the water gate.</p> <p>Available record of water table and water pole maintenance contains date, block number, upkeep of water pole, making water pole, upkeep water table, making water table, upkeep peat subsidence pole, pipe cleaning, repaint, weeding and cleaning signboard.</p> <p>All station visited are in good condition and scale are readable. Furthermore, the unit of certification has made improvement in establishing Watergate using calcic board.</p>	
7.7.7	<p>(C) All peat areas not planted and reserved in managed areas (regardless of depth) are protected as 'peatland conservation areas'; unit of certification are prohibited from constructing drainage channels, building roads and new electricity lines on peatlands; unless if it is for a non-corporate land clearance. Peatlands are managed in accordance with 'RSPO Best Management Practices for the Management and Rehabilitation of Natural Vegetation related to Oil Palm Cultivation that already exists in Peatlands' (the latest version) along with relevant audit guidelines.</p>	<p>Based on field visit, interview and document review, there is no extensive planting on peat in UMWS Estate, UMWN Estate and TUM Estate.</p>	Complied
Criteria 7.8: Practices maintain the quality and availability of surface and groundwater.			
7.8.1	<p>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:</p> <p>7.8.1a The unit of certification does not limit access to clean water or does not pollute the water used by the community.</p>	<p>The unit of certification has a document called "Rencana Pengelolaan Air" – Water management plan, effective date 5 January 2021. The water management plan identified the water source for mill processing need and domestic water need is from Sungai Barumun; explanation on the water treatment process.</p> <p>The water management plan explains on the water intake/consumption, permit, water need for palm oil mill – based on water consumption/ton FFB processed, water need for domestic use, plan to record the water</p>	Complied

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		<p>consumption – on monthly basis. Below are records of water consumption 2020:</p> <table border="1"> <thead> <tr> <th>Month</th> <th>FFB (ton)</th> <th>Water use for Process (m³)</th> <th>Water use for Domestic (m³)</th> <th>Rate (ton/m³)</th> </tr> </thead> <tbody> <tr><td>Jan</td><td>13,497.42</td><td>17,493</td><td>13,989</td><td>1.50</td></tr> <tr><td>Feb</td><td>11,893.50</td><td>18,624</td><td>13,066</td><td>1.61</td></tr> <tr><td>Mar</td><td>12,706.38</td><td>17,532</td><td>14,165</td><td>1.61</td></tr> <tr><td>Apr</td><td>13,526.53</td><td>21,406</td><td>11,034</td><td>1.54</td></tr> <tr><td>May</td><td>11,831.52</td><td>17,890</td><td>13,788</td><td>1.50</td></tr> <tr><td>Jun</td><td>14,632.34</td><td>25,417</td><td>11,232</td><td>1.56</td></tr> <tr><td>Jul</td><td>18,178.62</td><td>30,129</td><td>10,356</td><td>1.61</td></tr> <tr><td>Aug</td><td>17,214.62</td><td>25,561</td><td>9,360</td><td>1.39</td></tr> <tr><td>Sep</td><td>16,910.87</td><td>26,923</td><td>10,422</td><td>1.60</td></tr> <tr><td>Oct</td><td>16,746.38</td><td>24,689</td><td>9,795</td><td>1.96</td></tr> <tr><td>Nov</td><td>15,326.51</td><td>22,937</td><td>7,752</td><td>1.93</td></tr> <tr><td>Dec</td><td>13,667.28</td><td>22,420</td><td>8,838</td><td>1.87</td></tr> <tr><td>Total</td><td>176,131.97</td><td>271,021</td><td>133,797</td><td>1.62</td></tr> </tbody> </table> <p>The water management plan explain the effort for water saving: installing automatic control system at water intake, to reduce leakage throughout water piping network, continuously have awareness to all worker on the importance of saving water. The water management plan explain the effort to maintain water quality and schedule for water quality test according to Regulation of Ministry of Health No.492/MENKES/PER/IV/2010 regarding requirement of drinking water quality. The water management plan includes facility maintenance by tank cleaning and maintenance of water tank and all supporting facility of water distribution. The water management plan has been implemented.</p>	Month	FFB (ton)	Water use for Process (m ³)	Water use for Domestic (m ³)	Rate (ton/m ³)	Jan	13,497.42	17,493	13,989	1.50	Feb	11,893.50	18,624	13,066	1.61	Mar	12,706.38	17,532	14,165	1.61	Apr	13,526.53	21,406	11,034	1.54	May	11,831.52	17,890	13,788	1.50	Jun	14,632.34	25,417	11,232	1.56	Jul	18,178.62	30,129	10,356	1.61	Aug	17,214.62	25,561	9,360	1.39	Sep	16,910.87	26,923	10,422	1.60	Oct	16,746.38	24,689	9,795	1.96	Nov	15,326.51	22,937	7,752	1.93	Dec	13,667.28	22,420	8,838	1.87	Total	176,131.97	271,021	133,797	1.62	
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		<p>Permit of water intake was evident based on “Keputusan Gubernur Sumatera Utara No.610/39/DIS PM PPTSP/6/XI.1/I/2018 tentang Izin Pengusahaan Sumber Daya Air kepada PT Umbul Mas Wisesa”, dated 9 January 2018 – valid for 3 years. The permit allows a maximum intake of 16.67 liter/second for processing and domestic use. The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p>																	
	<p>7.8.1b Workers have adequate access to clean water.</p>	<p>The Estate has provided access to clean water for the workers by providing water filtration installation in each housing complex. Domestic water usage are reported to the RMO monthly. Deep water analysis was conducted annually.</p>																	
<p>7.8.2</p>	<p>(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).</p>	<p>The are no river crossing the area of PT Umbul Mas Wisesa and PT Toton Usaha Mandiri. The nearest river is Barumon River, which is the water source for processing and domestic use. Buffer zone of riparian are well maintained as observed during field visit. The company has reserved area alongside drain zone, based on field visit, it was seen that alongside drain are maintained well and no chemical applied. The unit of certification has planted vetiver grass to prevent erosion.</p>	<p>Complied</p>																
<p>7.8.3</p>	<p>Mill effluent is managed according to applicable regulations. The quality of mill effluent discharged, especially BOD (Biochemical Oxygen Demand) is monitored in accordance with applicable regulations.</p>	<p>UMW POM has monitored the mill effluent to be in compliance with national regulation as per document “Laporan Hasil Analisa Limbah Cair PT Umbul Mas Wisesa - UMW year 20.</p> <p>Measurement of mill effluent quality conducted by accreditation environmental testing and laboratory. Sample seen, month November 2020:</p> <table border="1" data-bbox="1133 1174 1809 1334"> <thead> <tr> <th>Parameter</th> <th>Satuan</th> <th>Baku Mutu</th> <th>October</th> </tr> </thead> <tbody> <tr> <td>BOD</td> <td>mg/l</td> <td>100</td> <td>24.6</td> </tr> <tr> <td>COD</td> <td>mg/l</td> <td>350</td> <td>79.2</td> </tr> <tr> <td>TSS</td> <td>mg/l</td> <td>250</td> <td>2.0</td> </tr> </tbody> </table>	Parameter	Satuan	Baku Mutu	October	BOD	mg/l	100	24.6	COD	mg/l	350	79.2	TSS	mg/l	250	2.0	<p>Complied</p>
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7.8.4	Mill water use per tonne of FFB is monitored and recorded.	<p>PT Umbul Mas Wisesa - UMW POM has shown the document of mill water use per tonne of Fresh Fruit Bunches (FFB) in 2020 as per document "Laporan Pemakaian Air Pabrik per MT FFB tahun 2020",</p> <table border="1"> <thead> <tr> <th>Month</th> <th>FFB (ton)</th> <th>Water us for Process (m³)</th> <th>Rate (ton/m³)</th> </tr> </thead> <tbody> <tr><td>Jan</td><td>11,566</td><td>31,482</td><td>1.51</td></tr> <tr><td>Feb</td><td>12,702</td><td>15,061</td><td>1.19</td></tr> <tr><td>Mar</td><td>12,192</td><td>18,147</td><td>1.49</td></tr> <tr><td>Apr</td><td>11,772</td><td>16,411</td><td>1.39</td></tr> <tr><td>May</td><td>13,655</td><td>18,519</td><td>1.36</td></tr> <tr><td>Jun</td><td>12,654</td><td>16,205</td><td>1.28</td></tr> <tr><td>Jul</td><td>17,199</td><td>21,800</td><td>1.27</td></tr> <tr><td>Aug</td><td>15,120</td><td>20,218</td><td>1.34</td></tr> <tr><td>Sep</td><td>14,824</td><td>18,969</td><td>1.28</td></tr> <tr><td>Oct</td><td>14,851</td><td>18,612</td><td>1.25</td></tr> <tr><td>Nov</td><td>11,407</td><td>16,001</td><td>1.40</td></tr> <tr><td>Dec</td><td>9,932</td><td>16,157</td><td>1.63</td></tr> <tr><td>Total</td><td>160,739</td><td>217,889</td><td>1.36</td></tr> </tbody> </table>	Month	FFB (ton)	Water us for Process (m ³)	Rate (ton/m ³)	Jan	11,566	31,482	1.51	Feb	12,702	15,061	1.19	Mar	12,192	18,147	1.49	Apr	11,772	16,411	1.39	May	13,655	18,519	1.36	Jun	12,654	16,205	1.28	Jul	17,199	21,800	1.27	Aug	15,120	20,218	1.34	Sep	14,824	18,969	1.28	Oct	14,851	18,612	1.25	Nov	11,407	16,001	1.40	Dec	9,932	16,157	1.63	Total	160,739	217,889	1.36	Complied
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Criteria 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised																																																											
7.9.1	Plans to increase the efficiency of fossil fuel use and to optimize renewable energy are available, monitored and documented	<p>Improving use of fossil fuel (through maintain engine and machinery efficiency). The repair process including replacement main steam valve, replace safety valve, replace manometer, replace cable tray, replace foot blowdown valve, replace chemical dosing pump.</p> <p>HSD Oil usage per metric ton FFB year 2020 and 2019,</p>	Complied																																																								

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Month	UMW South Estate (HSD Oil ton FFB) - 2020	UMW South Estate (HSD Oil ton FFB) - 2019
January	1.52	1.68
February	1.67	2.00
March	1.53	1.72
April	0.97	1.61
May	1.12	1.85
June	1.04	1.72
July	0.88	1.23
August	0.89	1.55
September	0.83	1.55
October	1.33	1.24
November	1.14	1.72
December	1.34	2.16
Average	1.14	1.64

The data has also presented at graphic and chart.

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

7.10.1	(C) GHG emissions for the unit of certification are identified and assessed. Plans to reduce or minimize GHG emissions are implemented, monitored through the PalmGHG calculator, and reported publicly.	Company has procedure Calculation and Mitigation of Green House Gas Emission No.ENC 01-12/04-03-2019/Rev.1 dated 18 March 2019, whereby provide guidance to register source of emissions as a result of company operation, mointor and reduce the use of materials emitting GHG emission, calculate GHG emission from company operational activities. Source of emission inventory from estate operation: use of inorganic fertilizer Urea (N), Dolomite (CaO), MOP (K ₂ O), Rock Phospate (P ₂ O ₅), use of pesticide, use HSD fuel, planted area, mature oil palm, FFB production, distance estate to POM, distance POM to bulking tank, OER %, KER %, presence of methane capture facility, etc.	Complied
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		<p>Handling emission from steam boiler in Mukomuko POM No.UMWPOM-WI/PROD/009E, consist of guideline for minimizing soot pollution/particulate: ensure fibre and shell feed; minimize shell to prevent black smoke; setting air damper for ignition, avoid excess air; dumping grate on regular basis, to minimize unburn fuel; shoot blowing every 4 hours to clean heat exchanger pipes; ensure dust collector operating in good manner; monitor boiler exhaust emission through smoke density meter; monitor boiler emission every 6 months by independent laboratory; record any problem.</p> <p>Handling emission from engine generator No.UMWPOM-WI/PROD/010D, consist of guideline for minimizing emission: ensure the generator operating at permitted load (80% from design); replace air filter element (every 1,250 hours), replace fuel filter (every 500 hours), replace oil filter (250 hours) – on regular basis; replace engine lubricant every 250 hours; should black smoke sighted – check engine load; should the black smoke sighted – check injection pump; monitor engine emission every 6 months by independent laboratory;</p> <p>GHG reduction plan identified under "Rencana Pengurangan Emisi Gas Rumah Kaca (GHG Emission) - 2020":</p> <table border="1"> <thead> <tr> <th>Stages/Activity type</th> <th>Mitigation Plan</th> <th>Implementation</th> </tr> </thead> <tbody> <tr> <td colspan="3">Preparation</td> </tr> <tr> <td rowspan="3">Land clearing/tree felling</td> <td>Zero burning</td> <td rowspan="3">• Memorandum from Director of Estate Department on zero burning</td> </tr> <tr> <td>Planting trees to absorb emission</td> </tr> <tr> <td>Identification of HCV and restore HCV area</td> </tr> </tbody> </table>	Stages/Activity type	Mitigation Plan	Implementation	Preparation			Land clearing/tree felling	Zero burning	• Memorandum from Director of Estate Department on zero burning	Planting trees to absorb emission	Identification of HCV and restore HCV area	
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			<p>Implement oil palm best management practice</p> <p>River riparian/buffer zone management</p> <p>Planting trees in river riparian/buffer zone and critical area</p> <p>Socialization to all level of worker on GHG mitigation plan during land clearing</p>	<ul style="list-style-type: none"> • Restoration (tree planting) record • HCV map • Topographic map • HCV assessment • Land clearing SOP 	
		Planting on peat	<p>Not recommended</p> <p>If needed, implement best management practices</p> <p>Install water level</p> <p>Monitor water level</p> <p>Manages the water gate</p> <p>Install check well with manual and digital measurement</p> <p>Monitor the check well</p>	<ul style="list-style-type: none"> • To manages the peat area as per regulation such as controlling the water level; • Maintain water level <40 cm; • Install 66 water level in main drain and collection drain; • Monitor water level twice per month; • Install check well as per guidance from Ministry of Environment • Monitoring check well twice per month 	

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		<p>Fertilizer application</p>	<p>Effective fertilizer application as per recommendation</p> <p>No fertilizer application in rainy season</p> <p>No fertilizer application on river buffer zone/riparian area</p> <p>Socialization to all level of worker on GHG mitigation plan related to impact of fertilizer application</p>	<ul style="list-style-type: none"> • Leaf sampling analysis for accurate fertilizer recommendation • Implement SOP fertilizer application 	
Upkeep and harvesting					
		<p>Use of fossil fuel for transportation (FFB, fertilizer, manpower)</p>	<p>Maintenance the vehicle on regular basis</p> <p>Planting trees</p> <p>Transportation arrangement (effective and efficient)</p> <p>Socialization to all level of worker on GHG mitigation plan related to machinery use and use of fossil fuel</p>	<ul style="list-style-type: none"> • Vehicle maintenance record • Planting record • Evaluation on vehicle use (incl. fuel efficiency) • Fuel 2018: 148,405 liters • Fuel 2019: 132,910 liters • Fuel 2020: 96,705 liters 	
		<p>Fertilizer and pesticide application</p>	<p>Planting beneficial plant</p> <p>Spraying knapsack calibration</p>	<ul style="list-style-type: none"> • Leaf sampling analysis for accurate fertilizer recommendation 	

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		<p>Spraying based on weed percentage >60%</p> <p>Effective fertilizer application as per recommendation</p>	<ul style="list-style-type: none"> • Implement SOP fertilizer application • Utilize recommended pesticide
Housing			
	<p>Use of fossil fuel for electric generation</p>	<p>Maintenance the machinery (genset) on regular basis</p> <p>Socialization to all level of worker on GHG mitigation plan related to machinery use and use of fossil fuel; and electricity efficiency</p> <p>Emission monitoring on regular basis</p>	<ul style="list-style-type: none"> • Vehicle maintenance record • Planting record • Evaluation on Genset's fuel efficiency
	<p>Waste decomposition in landfill</p>	<p>Waste collection to landfill</p>	<p>Landfill in UMW South estate</p>
FFB processing in palm oil mill			
	<p>Waste management</p>	<p>Using methane capture and utilize the biogas</p> <p>Utilize EFB as boiler fuel</p>	<ul style="list-style-type: none"> • Methane capture and biogas plant in POM • Install EFB shredder in POM
	<p>Use of fossil fuel for transportation (FFB, CPO, PK, EFB)</p>	<p>Maintenance the vehicle on regular basis</p> <p>Socialization to all level of worker on GHG</p>	<ul style="list-style-type: none"> • Vehicle maintenance record • Evaluation on electricity efficiency

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		<table border="1"> <tr> <td data-bbox="1126 362 1368 427"></td> <td data-bbox="1368 362 1664 427">mitigation plan related to electricity efficiency</td> <td data-bbox="1664 362 1982 427"></td> </tr> <tr> <td data-bbox="1126 427 1368 528">Operation of POM's machinery including boiler</td> <td data-bbox="1368 427 1664 528">Maintenance the POM's machinery on regular basis</td> <td data-bbox="1664 427 1982 528"> <ul style="list-style-type: none"> • Machinery maintenance record • Evaluation on boiler's efficiency • Emission monitoring report </td> </tr> <tr> <td data-bbox="1126 528 1368 659"></td> <td data-bbox="1368 528 1664 659">Socialization to all level of worker on GHG mitigation plan related to emission</td> <td data-bbox="1664 528 1982 659"></td> </tr> <tr> <td data-bbox="1126 659 1368 724"></td> <td data-bbox="1368 659 1664 724">Emission monitoring on regular basis</td> <td data-bbox="1664 659 1982 724"></td> </tr> </table> <p>Company have prepared the PalmGHG calculator v4, based on database period January – December 2020. The result of calculation has been attached as appendix. The company have report the GHG calculator to RSPO.</p>		mitigation plan related to electricity efficiency		Operation of POM's machinery including boiler	Maintenance the POM's machinery on regular basis	<ul style="list-style-type: none"> • Machinery maintenance record • Evaluation on boiler's efficiency • Emission monitoring report 		Socialization to all level of worker on GHG mitigation plan related to emission			Emission monitoring on regular basis								
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	Emission monitoring on regular basis																				
7.10.2	<p>(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).</p>	<p>In PT. Umbul Mas Wisesa, From the "Hectare Statement", recording the land preparation and planting realization. HCV area and the vegetation are maintained.</p> <p>UMW South Estate demonstrates their planting year period:</p> <table border="1"> <thead> <tr> <th>OP planting year</th> <th>Hectarage</th> </tr> </thead> <tbody> <tr> <td>2005</td> <td>1,003.76 Ha</td> </tr> <tr> <td>2006</td> <td>234.27 Ha</td> </tr> <tr> <td>2007</td> <td>1,622.59 Ha</td> </tr> <tr> <td>2008</td> <td>769.87 Ha</td> </tr> <tr> <td>2009</td> <td>351.97 Ha</td> </tr> <tr> <td>2010</td> <td>256.08 Ha</td> </tr> <tr> <td>2011</td> <td>207.64 Ha</td> </tr> <tr> <td>Total</td> <td>4,446.18 Ha</td> </tr> </tbody> </table> <p>UMW North Estate demonstrates their planting year period:</p>	OP planting year	Hectarage	2005	1,003.76 Ha	2006	234.27 Ha	2007	1,622.59 Ha	2008	769.87 Ha	2009	351.97 Ha	2010	256.08 Ha	2011	207.64 Ha	Total	4,446.18 Ha	Complied
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		OP planting year	Hectarage		
		2006	43.22 Ha		
		2007	440.52 Ha		
		2008	671.02 Ha		
		2009	819.55 Ha		
		2010	399.59 Ha		
		2011	227.32 Ha		
		Total	2,601.22 Ha		
		There is no planting year after 2014.			
7.10.3	(C) Other significant pollutant identification results are available and plans to reduce or minimize them are implemented and monitored.	The company has prepared a strategy in effort to reduce and mitigate pollution and emission. Monitoring of pollution and emission quality for plantation has been planned and implemented, e.g. air quality ambient for boiler and power generator, water quality test for surface and ground water, effluent water quality, noise level, etc. The monitoring result is incorporated in RKL/RPL (environmental management and monitoring plan) and reported regularly to the government. In UMW POM, all emission are monitored.		Complied	
Criteria 7.11: Fire is not used for preparing land and is prevented in the managed area.					
7.11.1	(C) Land for new planting or replanting is not prepared by burning.	Based on field visit and document review there is no new planting or replanting preparation carried out by burning.		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.	Based on field visit and document review there is no new planting or replanting preparation carried out by burning.		Complied	
7.11.3	The unit of certification engages stakeholders in adjacent locations for fire prevention and control measures.	The company has established fire prevention committee as documented in "Tim Satuan Tugas Pengendalian Kebakaran Lahan Perkebunan" dated 19 Nov 2019. The committee is aligned with Emergency Response Team. The committee consist of: Chairman; Secretary; PIC for prevention; PIC for control; PIC for Logistic; Main Team consist of 2 team; Support Team consist of 2 team; Helper Team consist of 2; team each team consist of 5 personnel. Emergency Response Committee were available in UMWS Estate, UMWN Estate and TUM Estate.		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.

7.12.1	<p>(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCV or HCS forests. Historical analysis of Land Use Change Analysis (LUCA) is carried out before any new land clearing, in accordance with the RSPO LUCA Guidance document (see indicator 7.12.2).</p>	<p>UMW South Estate demonstrates their planting year period:</p> <table border="1"> <thead> <tr> <th>OP planting year</th> <th>Hectarage</th> </tr> </thead> <tbody> <tr><td>2005</td><td>1,003.76 Ha</td></tr> <tr><td>2006</td><td>234.27 Ha</td></tr> <tr><td>2007</td><td>1,622.59 Ha</td></tr> <tr><td>2008</td><td>769.87 Ha</td></tr> <tr><td>2009</td><td>351.97 Ha</td></tr> <tr><td>2010</td><td>256.08 Ha</td></tr> <tr><td>2011</td><td>207.64 Ha</td></tr> <tr><td>Total</td><td>4,446.18 Ha</td></tr> </tbody> </table> <p>UMW North Estate demonstrates their planting year period:</p> <table border="1"> <thead> <tr> <th>OP planting year</th> <th>Hectarage</th> </tr> </thead> <tbody> <tr><td>2006</td><td>43.22 Ha</td></tr> <tr><td>2007</td><td>440.52 Ha</td></tr> <tr><td>2008</td><td>671.02 Ha</td></tr> <tr><td>2009</td><td>819.55 Ha</td></tr> </tbody> </table>	OP planting year	Hectarage	2005	1,003.76 Ha	2006	234.27 Ha	2007	1,622.59 Ha	2008	769.87 Ha	2009	351.97 Ha	2010	256.08 Ha	2011	207.64 Ha	Total	4,446.18 Ha	OP planting year	Hectarage	2006	43.22 Ha	2007	440.52 Ha	2008	671.02 Ha	2009	819.55 Ha	Complied
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		<p>Based on document HCV identification by “Yayasan Kelapa Sawit Berkelanjutan Indonesia” (YASBI-Indonesian Sustainable Palm Oil Foundation) in 2009:</p>															
		<ul style="list-style-type: none"> • Section II.1.5 stated “Berdasarkan interpretasi citra satelit pada tahun 2007, diperoleh informasi hamper seluruh area kebun PT. Umbul Mas Wisesa telah menjadi lahan terbuka dan semak belukar rawa yang merupakan bekas pembukaan hutan rawa, dan sebagian lain sudah berupa tanaman kelapa sawit.” – Based on interpretation of landsat imagery 2007, almost all of plantation of PT. Umbul Mas Wisesa has been developed into open area and swamp bushes as a result from swamp forest clearing; the other area already in form of oil palm plantation. • Section II.1.5 stated “Peta penutupan lahan tahun 2008/2009 tutupan lahan di area PT. Umbul Mas Wisesa berupa perkebunan dan lahan gambut terbuka” – The land cover map year 2008/2009 the land cover in PT. Umbul Mas Wisesa in form of plantation and open peat area. • Section II.1.6 stated “Peta Kawasan Hutan di dalam dan sekitar PT. Umbul Mas Wisesa berupa Area Penggunaan Lain/APL” – Based on 															

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		<p>overlay of forest area map against operation map PT. Umbul Mas Wisesa, it is located on "Area Penggunaan Lain/APL", or area for other purpose (including plantation).</p> <p>Based on document HCV identification "Penilaian NKT/HCV PT. Toton Usaha Mandiri di Kabupaten Labuhan Batu, Provinsi Sumatera Utara" by "Yayasan Kelapa Sawit Berkelanjutan Indonesia" (YASBI-Indonesian Sustainable Palm Oil Foundation) in November 2009:</p> <ul style="list-style-type: none"> • Section II.1.5 stated "Berdasarkan interpretasi citra satelit pada tahun 2007, diperoleh informasi bahwa sebagian areal kebun PT. Toton Usaha Mandiri masih terdapat sisa areal berhutan berupa hutan rawa sekunder seluas 473.20 dan sebagian lain telah menjadi lahan terbuka dan semak belukar rawa." – Based on interpretation of landsat imagery 2007, some area of plantation of PT. Toton Usaha Mandiri remains to be secondary swamp forest of 473.20 Ha and the rest has been developed into open area and swamp bushes. • Section II.1.5 stated "Kemudian pada tahun 2008 sampai sekarang seluruh areal PT. Toton Usaha Mandiri telah ditanami kelapa swait sementara pada lahan disekitarnya telah menjadi semak belukar rawa dan juga lahan terbuka dan ada juga yang ditanami kelapa sawit." – The land cover map year 2008 the land cover in PT. Toton Usaha Mandiri has been planted with oil palm plantation and the surrounding area is open peat area and community oil palm plantation. • Section II.1.6 stated "Peta Kawasan Hutan di dalam dan sekitar PT. Toton Usaha Mandiri berupa Area Penggunaan Lain/APL... Namun demikian pada sisi bagian timur areal PT. Toton Usaha Mandiri yang berbarasan dengan Propinsi Riau ditetapkan oleh pemerintah dalam TGHK sebagai Hutan Lindung" – Based on overlay of forest area map against operation map Toton Usaha Mandiri, it is located on "Area Penggunaan Lain/APL", or area for other purpose (including 	
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		<p>plantation)... however on the east side of PT. Toton Usaha Mandiri neighboring with Protected Forest located in Riau Province.</p> <p>Therefore, there are area being planted (period 2005-2009) prior to HCV assessment in 2009.</p> <p>PT. Umbul Mas Wisesa – UMW POM followed Remediation and Compensation Procedure (RaCP). PT. Umbul Mas Wisesa – UMW POM have received approved compensation plan in 2015, prior to certification decision. Detailed explanation related to Compensation Plan to comply with Remediation and Compensation Plan given in indicator 7.12.8.</p>	
7.12.2	<p>(C) HCV and HCS forests, and other conservation areas are identified as follows:</p> <p>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.</p>	<p>PT. Umbul Mas Wisesa (UMW) has conducted HCV identification by “Yayasan Kelapa Sawit Berkelanjutan Indonesia” (YASBI-Indonesian Sustainable Palm Oil Foundation) in 2009, referring “Indonesian HCV Toolkit, 2008”. Total HCV areas was identified is 196.09 Ha and consist of 167 Ha is <i>Hutan Konversi</i> and riparian covering 20.79 Ha – in form of wildlife corridor.</p> <p>The HCV assessment team comprise of Ir. Purwo Susanto (RSPO HCV approved assessor, Team Leader); Dr. Kunkun Jaka Gurmaya (Biodiversity flora and fauna); Neny Indriyana, S.Hut, MT (Ecology); Ir. Riswan (GIS); Handy Rusydi S.Hut (GIS); Ir. Hery Prasetyo (Social – cultural).</p> <p>PT. Toton Usaha Mandiri (TUM) has identified High Conservation Value (HCV) in 2009 conducted by “Yayasan Kelapa Sawit Berkelanjutan Indonesia” (YASBI-Indonesian Sustainable Palm Oil Foundation) as outlined in the Assessment Report HCV/HCV PT Toton Usaha Mandiri in 2009. In the report described the HCV areas found in working area of PT. TUM i.e. HCV 1, HCV 3 and HCV 4 with a total area of 57.54 Ha in the form of conservation forest area of 39.30 Ha, border drain and corridors covering an area of 2.38 Ha.</p> <p>The HCV assessment team comprise of Ir. Purwo Susanto (RSPO HCV approved assessor, Team Leader); Dr. Kunkun Jaka Gurmaya</p>	Complied

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		<p>(Biodiversity flora and fauna); Neny Indriyana, S.Hut, MT (Ecology); Ir. Riswan (GIS); Handy Rusydi S.Hut (GIS); Ir. Hery Prasetyo (Social – cultural).</p> <p>Public Consultation to the surrounding community have been conducted on 18 November 2009 at the Office of PT. Umbul Mas Wisesa, which was attended by representatives of leaders 'local community', the sub-district and the villages (Desa Tanjung Mulia, Sei Toras, Sei Siarti) in accordance with the document "Notulensi Publik Penilaian Nilai Konservasi Tinggi –NKT (HCV)".</p>	
	<p>7.12.2 b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the 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.</p>	<p>UMW South Estate, UMW North Estate, TUM Estate: There is no new land clearing after 15 November 2018.</p>	
<p>7.12.3</p>	<p>(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.</p>	<p>PT. Umbul Mas Wisesa - UMW POM and its supply base located in Sumatera Utara Province, Sumatera Island, Indonesia. Based on document "RSPO No Deforestation Consultancy: High Forest Cover Countries – Consultancy report on definitions and recommendations to the RSPO, June 2018" by Proforest; Indonesia fall into "High Remaining Forest, High Rate of Deforestation/HFHD". Refer to "Section 4.6 Statistics on potential high forest cover countries" – Indonesia categorized to have 53% forest cover; 15% Intact Forest Landscape; 54.2% forest (national source); 5.4% Oil Palm Land Area; 0.7%/year deforestation rate (FAO); Increasing Deforestation Trend; 0.9%/year deforestation rate (national source); constant deforestation rate/trend.</p> <p>PT. Umbul Mas Wisesa's estate and PT. Toton Usaha Mandiri Estate located under "Area Penggunaan Lain/APL" – Area for Other Purpose (non forest area). But along the eastern boundary, the companies</p>	<p>Complied</p>

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		<p>located next to Riau Province whereby the land designated as "Hutan Lindung/Protected Forest".</p> <p>PT. Umbul Mas Wisesa's NDPE policy: General Information: New Development Area and Replanting No.OPM-03-00/02-10-2017, dated 20 November 2017. Stipulates "land clearing and replanting on peat land will be influenced by the type and depth of peat". General Information: Survey and Mapping No.OPM-03-01/02-10-2017, dated 20 November 2017. Stipulates company views on peat: "Especially for extensive peat soil, the distribution, level of maturity and depth of peat must be explained"; company view on conservation area: "the presence or absence of national park, production forest and limited production forest. Whether or not there is riparian reserves and conservation area".</p> <p>SOP Planting Plant – Approval No.ESD-01-02/11-03-2019 dated 27 March 2019. The planting approval process will review information on planting material (incl. seed certificate), soil information (soil type, peat depth map, drainability assessment, water management plan, drainage and Watergate map), topographic and slope information, presence of conservation area, OHS requirement and fire risk.</p> <p>Based on HCV assessment document by YASBI, 2009 – there is no HCV area located on local community's land, and/or local communities with legal or customary rights. Company demonstrated recognition of legal and customary lands based on participatory land use planning by preparing scheme smallholder plantation on clean-and-clear land. The local community proposed their plantation to become oil palm plantation (replanting).</p>	
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PROCEDURAL NOTE for 7.12.3:
 Indicator 7.12.3. is not relevant to Indonesia, until further decisions by the RSPO.

<p>7.12.4</p>	<p>(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 are developed, implemented and adapted if necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan was developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p>	<p>Peat land is present. Maintenance, protection and enhancement as explained on Criterion 7.7.</p> <p>In 2019: "Program Pengelolaan NKT PT. Umbul Mas Wisesa North and PT. Toton Usaha Mandiri 2019" is evident. The HCV management plan including Forest guard patrol in two weeks interval, upkeep HCV corridor in monthly basis, planting of corridor planned in July, monitoring of wildlife in monthly basis, upkeep HCV notice board planned in May, upkeep of HCV and corridor poles planned in January and June.</p> <p>Implementation: "Form Monitoring Satwa Liar UMW North dan TUM Estate" period July 2019: White-breasted woodswallow/<i>Artamus leucorhynchus</i> (IUCN LC, not protected in Indonesia) sighted 11 July 2019 in HCV TUM Estate; Southern pig-tailed macaque/<i>Macaca nemestrina</i> (IUCN Vu, not protected in Indonesia) sighted 20 July 2019 in HCV UMW North; Lesser adjutant/<i>Leptoptilos javanicus</i> (IUCN Vu, not protected in Indonesia) sighted 2 July 2019 in HCV TUM Estate; Black eagle/<i>Ictinaetus malayensis</i> (IUCN LC, protected in Indonesia) sighted 20 July 2019 in HCV UMW North.</p> <p>"Form Monitoring Satwa Liar UMW North dan TUM Estate" period August 2019: Rhinoceros hornbill/<i>Buceros rhinoceros</i> (IUCN Vu, protected in Indonesia) sighted 24 August 2019 in HCV TUM Estate; Great hornbill/<i>Buceros bicornis</i> (IUCN Vu, protected in Indonesia) sighted 28 August 2019 in HCV UMW North Estate; Southern pig-tailed macaque/<i>Macaca nemestrina</i> (IUCN Vu, not protected in Indonesia) sighted 23 August 2019 in HCV TUM Estate; Agile gibbon/<i>Hylobates agilis</i> (IUCN EN, protected in Indonesia) sighted 28 August 2019 in HCV UMW North Estate; Long-tailed parakeet/<i>Psittacula longicauda</i> (IUCN Vu, protected in Indonesia) sighted 24 August 2019 in HCV UMW North.</p> <p>"Form Monitoring Satwa Liar UMW North dan TUM Estate" period September 2019: Long-tailed parakeet/<i>Psittacula longicauda</i> (IUCN Vu,</p>	<p>Complied</p>
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		<p>protected in Indonesia) sighted 20 September 2019 in HCV TUM Estate; Southern pig-tailed macaque/<i>Macaca nemestrina</i> (IUCN Vu, not protected in Indonesia) sighted 20 September 2019 in HCV UMW North; Black eagle/<i>Ictinaetus malayensis</i> (IUCN LC, protected in Indonesia) sighted 21 September 2019 in HCV UMW North; Lesser adjutant/<i>Leptoptilos javanicus</i> (IUCN Vu, not protected in Indonesia) sighted 21 September 2019 in HCV TUM Estate; Thomas’s langur/<i>Presbytis thomasi</i> (IUCN Vu, protected in Indonesia) sighted 21 September 2019 in HCV UMW North Estate.</p> <p>Checklist conservation area 2-27 August 2019, in HCV area UMW North Estate, block H22, H21a, J21a, K21a – cutting <i>Mucuna</i> infestation; 3, 11, 20, 29 October 2019, in HCV area UMW North Estate, block H22, H21a, J21a, K21a – no fire, no illegal logging, found pig trap; 4-28 November 2019, in HCV area UMW North Estate, block H19, J21a, H22, K21 – found pig traps, snake traps; 23 December 2019, in HCV area UMW North Estate, block J21a – found pig trap;</p> <p>Checklist conservation area 3-22 August 2019, in HCV area TUM Estate, block L11a, L21a, K21a – remove pig trap, remove fish trap; 3-25 October 2019, in HCV area TUM Estate, block L11a, L21a, K21a – remove pig trap, remove fish trap;</p> <p>In 2020: There is changes in patrol/controlling conservation area and installation of camera trap to mitigate impact related to some findings during patrol year 2019: pig trap, snake trap, fish trap in HCV area. Therefore “Program Pengelolaan NKT PT. Umbul Mas Wisesa North dan PT. Toton Usaha Mandiri Estate 2020”.</p> <ul style="list-style-type: none"> • Patrol/controlling conservation area – every month; • Upkeep HCV corridor – every other month; 	
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		<ul style="list-style-type: none"> • Planting on corridor – every other month; • Camera trap install – every other month; • Inventory and prepare/replace the signboard of conservation/HCV area – every other month, by ranger, report into monitoring form; • Inventory the conservation/HCV area boundary poles - every other month, by ranger, report into monitoring form; <p>Upkeep the HCV corridor – every other month, by ranger, report into monitoring form;</p>	
7.12.5	Where rights of local communities have been identified in HCV areas and HCS forest after 15 November 2018, peatland and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.	All HCV located inside HGU/legal ownership of the land. There is no HCV area located in local community's land.	Complied
7.12.6	All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.	<p>During 2020, training for any aspects that collecting people in certain location was cancelled due to Covid-19 pandemic. This HCV training program for enhancing knowledge of workforce are based on periodical monitoring of HCV area and wildlife animal monitoring.</p> <p>Company communicating the presence of HCV area, including the protection of wildlife within – through Memorandum dated 13 June 2019: "Dilarang Masuk Wilayah NKT (Nilai Konservasi Tinggi)" – no entrance on HCV area and damage the conservation value. Para 3 stipulates "Bagi siapa saja pihak-pihak terkait yang melanggar himbauan ini, akan diberikan sanksi tegas dan sesuai perundang-undangan yang berlaku" – Whoever violates the memorandum, will be given sanction as per applicable national law.</p> <p>UMW North Estate: Training HCV for worker on 26 December 2019, whereby attended by 19 workers. The training material consist of type of HCV, function of conservation, presence of HCV in UMW North Estate, Monitoring</p>	Complied

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		<p>methodology, Type of threat to HCV area, Signage of HCV area, Invasive species, no burning, no hunting, no poisoning, no vandalism. Communicating the presence of HCV area and wildlife in the plantation to surrounding village – Desa Sei Siarti on 6 December 2019, whereby community: Mr. Ilham Nur, Ahmad and Damsit attended. The communication material consist of type of HCV in UMW plantation, function of conservation, Signage of HCV area, Policy on: no burning, no hunting, no poisoning, no vandalism.</p> <p>TUM Estate: Training HCV for worker on 26 December 2019, whereby attended by 13 workers.</p>	
7.12.7	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p>	<p>In 2019: “Program Pengelolaan NKT PT Umbul Mas Wisesa North and PT. Toton Usaha Mandiri 2019” is evident. The HCV management plan including Forest guard patrol in two weeks interval, upkeep HCV corridor in monthly basis, planting of corridor planned in July, monitoring of wildlife in monthly basis, upkeep HCV notice board planned in May, upkeep of HCV and corridor poles planned in January and June. Implementation: “Form Monitoring Satwa Liar UMW North dan TUM Estate” period July 2019: White-breasted woodswallow/<i>Artamus leucorhynchus</i> (IUCN LC, not protected in Indonesia) sighted 11 July 2019 in HCV TUM Estate; Southern pig-tailed macaque/<i>Macaca nemestrina</i> (IUCN Vu, not protected in Indonesia) sighted 20 July 2019 in HCV UMW North; Lesser adjutant/<i>Leptoptilos javanicus</i> (IUCN Vu, not protected in Indonesia) sighted 2 July 2019 in HCV TUM Estate; Black eagle/<i>Ictinaetus malayensis</i> (IUCN LC, protected in Indonesia) sighted 20 July 2019 in HCV UMW North. “Form Monitoring Satwa Liar UMW North dan TUM Estate” period August 2019: Rhinoceros hornbill/<i>Buceros rhinoceros</i> (IUCN Vu, protected in Indonesia) sighted 24 August 2019 in HCV TUM Estate; Great</p>	Complied

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		<p>hornbill/<i>Buceros bicornis</i> (IUCN Vu, protected in Indonesia) sighted 28 August 2019 in HCV UMW North Estate; Southern pig-tailed macaque/<i>Macaca nemestrina</i> (IUCN Vu, not protected in Indonesia) sighted 23 August 2019 in HCV TUM Estate; Agile gibbon/<i>Hylobates agilis</i> (IUCN EN, protected in Indonesia) sighted 28 August 2019 in HCV UMW North Estate; Long-tailed parakeet/<i>Psittacula longicauda</i> (IUCN Vu, protected in Indonesia) sighted 24 August 2019 in HCV UMW North. "Form Monitoring Satwa Liar UMW North dan TUM Estate" period September 2019: Long-tailed parakeet/<i>Psittacula longicauda</i> (IUCN Vu, protected in Indonesia) sighted 20 September 2019 in HCV TUM Estate; Southern pig-tailed macaque/<i>Macaca nemestrina</i> (IUCN Vu, not protected in Indonesia) sighted 20 September 2019 in HCV UMW North; Black eagle/<i>Ictinaetus malayensis</i> (IUCN LC, protected in Indonesia) sighted 21 September 2019 in HCV UMW North; Lesser adjutant/<i>Leptoptilos javanicus</i> (IUCN Vu, not protected in Indonesia) sighted 21 September 2019 in HCV TUM Estate; Thomas's langur/<i>Presbytis thomasi</i> (IUCN Vu, protected in Indonesia) sighted 21 September 2019 in HCV UMW North Estate.</p> <p>In 2020: There is changes in patrol/controlling conservation area and installation of camera trap to mitigate impact related to some findings during patrol year 2019: pig trap, snake trap, fish trap in HCV area. Therefore "Program Pengelolaan NKT PT. Umbul Mas Wisesa North dan PT. Toton Usaha Mandiri Estate 2020".</p> <ul style="list-style-type: none"> • Patrol/controlling conservation area – every month; • Upkeep HCV corridor – every other month; • Planting on corridor – every other month; • Camera trap install – every other month; • Inventory and prepare/replace the signboard of conservation/HCV area – every other month, by ranger, report into monitoring form; 	
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		<ul style="list-style-type: none"> Inventory the conservation/HCV area boundary poles - every other month, by ranger, report into monitoring form; Upkeep the HCV corridor – every other month, by ranger, report into monitoring form; 																																													
7.12.8	<p>(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.</p>	<p>UMW South Estate demonstrates their planting year period:</p> <table border="1"> <thead> <tr> <th>OP planting year</th> <th>Hectarage</th> </tr> </thead> <tbody> <tr><td>2005</td><td>1,003.76 Ha</td></tr> <tr><td>2006</td><td>234.27 Ha</td></tr> <tr><td>2007</td><td>1,622.59 Ha</td></tr> <tr><td>2008</td><td>769.87 Ha</td></tr> <tr><td>2009</td><td>351.97 Ha</td></tr> <tr><td>2010</td><td>256.08 Ha</td></tr> <tr><td>2011</td><td>207.64 Ha</td></tr> <tr><td>Total</td><td>4,446.18 Ha</td></tr> </tbody> </table> <p>UMW North Estate demonstrates their planting year period:</p> <table border="1"> <thead> <tr> <th>OP planting year</th> <th>Hectarage</th> </tr> </thead> <tbody> <tr><td>2006</td><td>43.22 Ha</td></tr> <tr><td>2007</td><td>440.52 Ha</td></tr> <tr><td>2008</td><td>671.02 Ha</td></tr> <tr><td>2009</td><td>819.55 Ha</td></tr> <tr><td>2010</td><td>399.59 Ha</td></tr> <tr><td>2011</td><td>227.32 Ha</td></tr> <tr><td>Total</td><td>2,601.22 Ha</td></tr> </tbody> </table> <p>TUM Estate demonstrates their planting year period:</p> <table border="1"> <thead> <tr> <th>OP planting year</th> <th>Hectarage</th> </tr> </thead> <tbody> <tr><td>2006</td><td>89.22 Ha</td></tr> <tr><td>2007</td><td>64.23 Ha</td></tr> <tr><td>2008</td><td>495.36 Ha</td></tr> <tr><td>2009</td><td>486.14 Ha</td></tr> </tbody> </table>	OP planting year	Hectarage	2005	1,003.76 Ha	2006	234.27 Ha	2007	1,622.59 Ha	2008	769.87 Ha	2009	351.97 Ha	2010	256.08 Ha	2011	207.64 Ha	Total	4,446.18 Ha	OP planting year	Hectarage	2006	43.22 Ha	2007	440.52 Ha	2008	671.02 Ha	2009	819.55 Ha	2010	399.59 Ha	2011	227.32 Ha	Total	2,601.22 Ha	OP planting year	Hectarage	2006	89.22 Ha	2007	64.23 Ha	2008	495.36 Ha	2009	486.14 Ha	Complied
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Total	1,134.95 Ha				
		<p>The HCV assessment for PT. Umbul Mas Wisesa carried out on 2009 by "Yayasan Sawit Berkelanjutan Indonesia/YASBI".</p> <p>The company has planted some of areas before HCV identification was conducted by YASBI in 2009. For those areas, the company has gone through the "Compensation and Remediation Plan" and it has been approved by RSPO in February 2015 – before being certified. PT. Umbul Mas Wisesa has also has gone through NPP process and it has been announced in RSPO website in December 2014. The compensation plan is implemented well and monitored by the company.</p> <p>In order to comply with "RSPO Remediation and Compensation Procedure, November 2015", PT. Umbul Mas Wisesa demonstrating the annual report and annual working plan for company's off-site compensation project to CAB. The compensation project in form of PT. SIPEF Biodiversity Indonesia, was obtained in September 2013, a license to manage a 12,672 Ha forest area under very high risk of deforestation. The area is located in Mukomuko Regency, Bengkulu Province, Indonesia – with the "Hutan Produksi Terbatas Air Manjungto (reg.62)". The forest concession is a critical buffer zone to the "Kerinci Seblat National Park". PT. SIPEF Biodiversity Indonesia obtained the license type "Izin Usaha Pemanfaatan Hasil Hutan Kayu-Restorasi Ekosistem/IUPHHK- RE", issued by Ministry of Forestry through permit "Surat Keputusan Menteri Kehutanan No.SK.622/MENHUT-II/2013 untuk Izin Usaha Pemanfaatan Hasil Hutan Kayu Restorasi Ekosistem seluas 12,672 Ha" dated 17 September 2013. The permit valid from 17 September 2013 up to 16 September 2072, located in Mukomuko Regency, Bengkulu Province.</p>			

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		<p>The report for 2019 available under "Rencana Kerja Tahunan Usaha Pemanfaatan Hasil Hutan Kayu Restorasi Ekosistem Dalam Hutan Alam Pada Hutan Produksi Periode Tahun 2020 PT. SIPEF Biodiversity Indonesia – Bab III Realisasi Pelaksanaan RKT 2019". The report comprise of:</p> <ul style="list-style-type: none"> • "Realisasi batas areal kerja" - boundary arrangement for operation area (8 km/80 poles) – 140%; • "Penataan areal kerja" - boundary arrangement for working area of 1,493.93 Ha/18 working partitions – 110%; • "Pembukaan wilayah hutan terbatas" - SK Kepala Dinas Lingkungan dan Kehutanan Provinsi Bengkulu No.49/IV-2/TAHUN 2017 tentang Izin Penggunaan Koridor" dated 19 June 2017), working shed, water dam, wooden bridge, opening patrol traces, nursery block, maintenance of working shed and micro hydro power plant – 100%; • "Inventarisasi Hutan Berkala Restorasi Ekosistem/IHBRE" – Inventory for flora and fauna; • "Penanaman" – Planting of total 17,243 trees in 50.80 Ha; • "Pemeliharaan" – Tree maintenance/upkeep: planting to date 38,315 trees (162.76 Ha), living trees 29,903 tress, dead tree 10,816 trees, replanting 5,589 trees (70.69 Ha). Maintenance in 2018 206.82 Ha and in 2019 of 265.57 Ha – total 472.41 Ha. Seedling production in 2019: 258,831 seedlings. Seedling distributed to local community: 852 seedlings, seedling distributed to government 1,574 seedlings; • "Restorasi habitat flora dan fauna pilihan" - Monitoring of wildlife using camera trap – list of wildlife caught on tape evident; • "Perlindungan kawasan" – Forest area protection: monthly patrol resulted in findigns: 5 case of illegal logging and 1 case of poaching. This including fire extinguishing activity on 11 fire hotspot; and cutting down 72 illegal oil palm trees planted on forest area. • "Pengelolaan dan pemantauan dampak lingkungan" – Monitoring of environment parameter: Monthly monitoring water debit in 10 rivers; Monitoring of river water quality in 4 rivers; 	
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		<ul style="list-style-type: none"> • <i>"Penelitian dan pengembangan"</i> – Research and Development: Measurement of permanent measurement plot on year-3; Aviary monitoring; Observation on presence of Tiger prey availability; Identification of flora on <i>"Inventarisasi Hutan Berkala Restorasi Ekosistem/IHBRE"</i>. • <i>"Peningkatan Kapasitas Sumber Daya Manusia"</i> – Human resources capacity building: 8 Trainings attended by the staff, including training on <i>"Penyusunan Informasi Profil Izin Usaha Restorasi Ekosistem dan Pendfinisian Kompnen Pemenuhan Kewajiban terhadap Negara"</i>, 1 March 2019; <i>"Penyusunan pedoman Pelaksanaan Penyampaian Laporan Kinerja Pemegang IUPHHK-RE secara Periodik"</i>, 28 February 2019; etc. • <i>"Peralatan kerja 2019"</i> – Working tool 2019: GPS, camera, camera trap, fire extinguisher, laptop, PC, printer, compass, clinometer, projector, hand counter, tent, sleeping bag, electric generator, water pump, mini chainsaw, sprayer machine, UPS, rollmeter, etc. <p>The working plan for 2020 available under <i>"Rencana Kerja Tahunan Usaha Pemanfaatan Hasil Hutan Kayu Restorasi Ekosistem Dalam Hutan Alam Pada Hutan Produksi Periode Tahun 2020 PT. SIPEF Biodiversity Indonesia"</i>.</p> <ul style="list-style-type: none"> • Planting plan for <i>"Restorasi Ekosistem tahun 2020"</i> comprise of natural wood of 31,800 trees, fruit trees of 5,680 trees, native species 14,300 trees, under canopy species 200 trees – total 51,980 trees. • Nursery in 5 blocks. • Working compartment arrangement for 814.51 Ha, comprise of 21 compartment and 32 poles; including its time frame. • Delineation of working compartment 20.28 km equal to 202 boundary poles. • Conflict resolution (illegal logging), encroachment for oil palm planting. 	
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Appendix B: Approved Time Bound Plan

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

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Appendix C: GHG Reporting Executive Summary

The GHG emissions that were produced in January – December 2020 for PT Umbul Mas Wisesa – UMW POM and supply base was calculated using the PalmGHG Calculator version 4.0.2. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in January – December 2020 for PT Umbul Mas Wisesa – UMW POM and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	6.86
PKO	0

Extraction	%
OER	23.11
KER	4.06

Production	t/yr
FFB Process	166,812
CPO Produced	28,550
PKO Produced	6,772

Land Use	Ha
OP Planted Area	0
OP Planted on peat	8,258.24
Conservation (forested)	0
Conservation (non-forested)	92
Total	8,258.24

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	0	0	-0.44	-0.02	-0.02	0	0	0
CO ₂ Emission from fertilizer	0.83	0.04	0.63	0.3	8.9	0.03	7.49	0
NO ₂ Emission	0.74	0.39	7.49	0.02	9.62	0.02	0.16	0.77
Fuel Consumption	0.07	0	0.43	0.01	3.53	0.01	0	0.02
Peat Oxidation	54.6	2.87	54.6	243	3,284.19	243	0	0
Sink								
Crop Sequestration	-9.36	-0.49	-9.36	-0.42	-563.11	-0.42	0	0
Conservation Sequestration	0	0	0	0	0	0	0	0
Total	4,461.45	84,955.05	1.123.94	24,492.07	6,386.81	25,492.97	60.15	582.74

*Note: Includes both estates and smallholders

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	38,873.31	0.23
Fuel Consumption	130.93	0
Grid Electricity Utilization	679.4	0
Credit		
Export of Grid Electricity	0	0

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Sales of PKS	0	0
Sales of EFB	0	0
Total	39,706.65	0.24

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO₂e
PK from own mill	N/A
PK from other source	N/A
Fuel Consumptions	N/A
Total Crusher emissions	N/A

*This mill has no kernel crusher operation.

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

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

Appendix D: Supply Chain Declaration

A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	Month - Year	Volume of FFB from certified supply bases (mt)	Volume of FFB from uncertified supply bases (mt)	Total FFB/Month (mt)
1	Jan 2020	14,892.17	-	14,892.17
2	Feb 2020	13,115.33	-	13,115.33
3	Mar 2020	12,590.93	-	12,590.93
4	Apr 2020	12,158.37	-	12,158.37
5	May 2020	14,095.13	-	14,095.13
6	Jun 2020	13,065.54	-	13,065.54
7	Jul 2020	18,040.45	-	18,040.45
8	Aug 2020	15,600.63	-	15,600.63
9	Sep 2020	15,296.99	-	15,296.99
10	Oct 2020	15,324.65	-	15,324.65
11	Nov 2020	11,783.74	-	11,783.74
12	Dec 2020	10,850.09	-	10,850.09
	Total	166,814.03	-	166,814.03

Note:
Last audit was in January 2021. The calculation period January – December 2020

B. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1	Jan 2020	3,490.72	606.11
2	Feb 2020	3,074.23	533.79
3	Mar 2020	2,951.31	512.45
4	Apr 2020	2,849.92	494.85
5	May 2020	3,303.90	573.67
6	Jun 2020	3,062.56	531.77
7	Jul 2020	4,228.68	734.25
8	Aug 2020	3,656.79	634.95
9	Sep 2020	3,585.61	622.59
10	Oct 2020	3,592.10	623.71
11	Nov 2020	2,762.11	479.60
12	Dec 2020	2,054.80	432.33
	Total	38,612.75	6,780.06

Note:
Last audit was in January 2021. The calculation period January – December 2020

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	Ivo Mas Tunggal	TR-376ac4e7-fb86		121.980
2	Ivo Mas Tunggal	TR-206d524b-d204		211.130
3	Ivo Mas Tunggal	TR-b30884d1-96b3		129.960
4	Ivo Mas Tunggal	TR-9a9803b5-3b2d		88.870
5	Ivo Mas Tunggal	TR-2472e0f8-c3fe		377.030

6	Ivo Mas Tunggal	TR-d933b58f-e8c7		22.970
7	Ivo Mas Tunggal	TR-92bffe9c-fef9		471.410
8	Ivo Mas Tunggal	TR-6121246b-e804		28.590
9	Ivo Mas Tunggal	TR-b980dd5c-4799		380.730
10	Ivo Mas Tunggal	TR-12cd63a0-2ad1		119.270
11	Ivo Mas Tunggal	TR-7b7d7bab-fceb		192.710
12	Ivo Mas Tunggal	TR-5f44bf3a-9d25		257.290
13	Ivo Mas Tunggal	TR-4453cf1b-ff1f		432.240
14	Ivo Mas Tunggal	TR-eb6ae38a-5f67		167.760
15	Ivo Mas Tunggal	TR-8ce88c41-21e0		600.000
16	Ivo Mas Tunggal	TR-527052d4-c1e2		888.480
17	Ivo Mas Tunggal	TR-9747e7a0-7200		11.520
18	Ivo Mas Tunggal	TR-463d12ab-d2db		800.000
19	Ivo Mas Tunggal	TR-4e48e82c-baf2		540.350
20	Ivo Mas Tunggal	TR-04fa0eca-5c58		250.680
21	Ivo Mas Tunggal	TR-9a0b2a28-73db		185.600
22	Ivo Mas Tunggal	TR-b48198bc-d655		58.970
23	Ivo Mas Tunggal	TR-3478b0b6-1b4f		175.320
24	Sinar Mas	TR-79adee16-5906		128.690
1	Ivo Mas Tunggal	TR-173ec1de-ca0b	299.420	
2	Ivo Mas Tunggal	TR-f4df1374-8014	333.240	
3	Ivo Mas Tunggal	TR-befcf480-0dd0	967.740	
4	Ivo Mas Tunggal	TR-0a08e9c6-bbf5	499.110	
5	Ivo Mas Tunggal	TR-8a486c50-92fc	486.500	
6	Ivo Mas Tunggal	TR-86560b24-0f26	9.120	
7	Ivo Mas Tunggal	TR-48e03365-57dc	10.380	
8	Ivo Mas Tunggal	TR-eb3cd123-a14b	12.660	
9	Ivo Mas Tunggal	TR-52745ac1-d383	78.040	
10	Ivo Mas Tunggal	TR-0f1e13bb-bfea	498.460	
11	Ivo Mas Tunggal	TR-6fa39417-1984	356.320	
12	Ivo Mas Tunggal	TR-9c7c652a-1d2e	299.500	
13	Ivo Mas Tunggal	TR-15ab1ecd-903e	490.750	
14	Ivo Mas Tunggal	TR-fec55f91-da4a	998.640	
15	Ivo Mas Tunggal	TR-52745ac1-d383	112.610	
16	Ivo Mas Tunggal	TR-1a9a16e8-5927	129.700	
17	Ivo Mas Tunggal	TR-733a2238-2e26	500.390	
18	Ivo Mas Tunggal	TR-4e65a207-daae	472.520	
19	Ivo Mas Tunggal	TR-e7ea4ffa-61a2	473.450	
20	Ivo Mas Tunggal	TR-20411568-0bb1	473.900	
21	Ivo Mas Tunggal	TR-513eafcb-6011	1.960	
22	Ivo Mas Tunggal	TR-65cb50af-ca2a	30.430	
23	Ivo Mas Tunggal	TR-eed6c8fa-2d6e	860	
24	Ivo Mas Tunggal	TR-6be6cf6a-881e	8.930	
25	Ivo Mas Tunggal	TR-e1f11bea-d947	27.080	
26	Ivo Mas Tunggal	TR-c8d00100-ecb7	25.710	
27	Ivo Mas Tunggal	TR-5b0c480f-9981	25.540	
28	Ivo Mas Tunggal	TR-234c2a63-d8bb	486.900	
29	Ivo Mas Tunggal	TR-944b5a6f-7c45	490.600	
30	Ivo Mas Tunggal	TR-b4bf8a33-5fbc	483.120	

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31	Ivo Mas Tunggal	TR-c4c2b1d2-4038	999.530	
32	Ivo Mas Tunggal	TR-a81ddbbd-c0a0	8.790	
33	Ivo Mas Tunggal	TR-715e06d3-eb3d	245.100	
34	Ivo Mas Tunggal	TR-06ae5557-0710	249.610	
35	Ivo Mas Tunggal	TR-5e4dad6-515a	1.738.540	
36	Ivo Mas Tunggal	TR-f4e7ce35-5476	11.910	
37	Ivo Mas Tunggal	TR-888fbd50-9075	15.680	
38	Ivo Mas Tunggal	TR-445942f6-27a6	254.290	
39	Ivo Mas Tunggal	TR-6e65d343-9175	499.920	
40	Ivo Mas Tunggal	TR-99c10ab6-289b	249.570	
41	Ivo Mas Tunggal	TR-79cf33ce-e985	258.880	
42	Ivo Mas Tunggal	TR-a6ba6cd2-bd42	498.860	
43	Ivo Mas Tunggal	TR-5b037904-7a44	477.930	
44	Ivo Mas Tunggal	TR-92b86c7d-01c9	1.995.630	
45	Ivo Mas Tunggal	TR-b85028f2-d21e	1.010	
46	Ivo Mas Tunggal	TR-d08927ba-e69c	12.570	
47	Ivo Mas Tunggal	TR-a1afbacc-22e3	499.090	
48	Ivo Mas Tunggal	TR-bdb0cd31-ab33	21.270	
49	Ivo Mas Tunggal	TR-6159fae7-fc23	420	
50	Ivo Mas Tunggal	TR-54f54d1a-79c1	499.330	
51	Ivo Mas Tunggal	TR-d9e56555-975f	987.490	
52	Ivo Mas Tunggal	TR-25df4d2a-6d24	170.300	
53	Ivo Mas Tunggal	TR-45f6372e-400a	819.260	
54	Ivo Mas Tunggal	TR-11105da8-a731	998.420	
55	Ivo Mas Tunggal	TR-ba1ad0e0-0273	10.140	
56	Ivo Mas Tunggal	TR-db035527-ceb1	328.250	
57	Ivo Mas Tunggal	TR-824ef2c0-1a81	179.150	
58	Ivo Mas Tunggal	TR-7e542cba-9fb2	124.730	
59	Ivo Mas Tunggal	TR-ee3ed136-d9e9	982.040	
60	Ivo Mas Tunggal	TR-f9480f75-edd7	499.650	
61	Ivo Mas Tunggal	TR-35926d8e-eed5	1.492.680	
62	Ivo Mas Tunggal	TR-c9611472-47d0	16.730	
63	Ivo Mas Tunggal	TR-05dc65e3-3c59	374.560	
64	Ivo Mas Tunggal	TR-fc3f72c8-cd1a	499.240	
65	Ivo Mas Tunggal	TR-173011e9-b609	459.520	
66	Ivo Mas Tunggal	TR-53057395-acfb	17.230	
67	Ivo Mas Tunggal	TR-d4a03379-682a	998.450	
68	Ivo Mas Tunggal	TR-1dbeb8c6-6d61	998.290	
69	Ivo Mas Tunggal	TR-9ac28df1-36c5	1.457.640	
70	Ivo Mas Tunggal	TR-d5bd0a48-f682	4.970	
71	Ivo Mas Tunggal	TR-089c5744-d611	39.710	
72	Ivo Mas Tunggal	TR-c319fb65-74d8	481.720	
73	Ivo Mas Tunggal	TR-81e392da-6601	39.790	
74	Ivo Mas Tunggal	TR-564ba612-708e	987.930	
75	Ivo Mas Tunggal	TR-57203590-e7b4	998.160	
76	Ivo Mas Tunggal	TR-a7b9f4e6-cdaa	499.040	
77	Ivo Mas Tunggal	TR-bfcd0b5d-c576	498.660	
78	Ivo Mas Tunggal	TR-9c7208da-876b	10.010	
79	Ivo Mas Tunggal	TR-f5d05b92-70da	997.980	
80	Ivo Mas Tunggal	TR-d80b8460-1cad	1.482.190	

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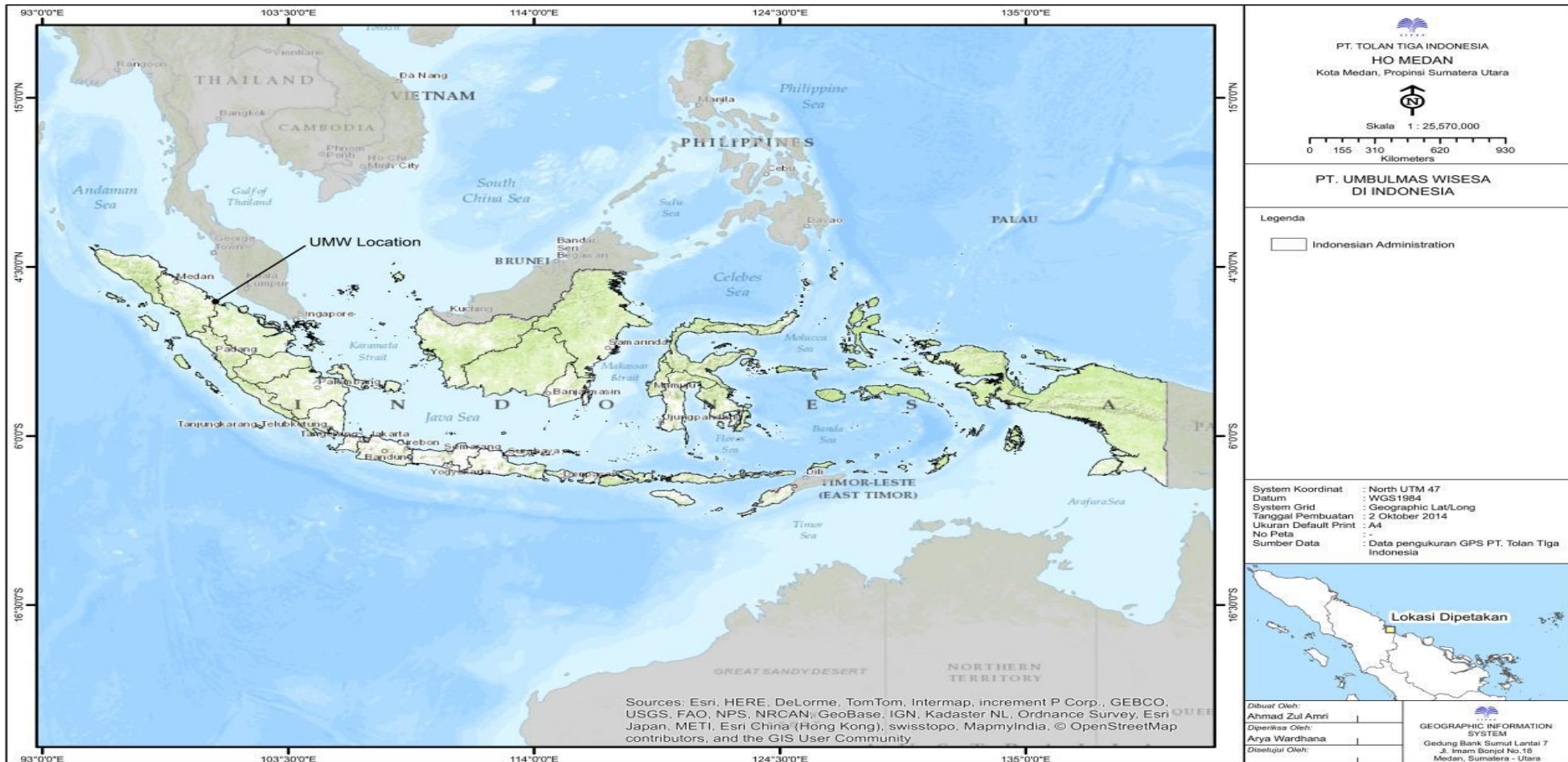
81	Ivo Mas Tunggal	TR-1b6003d6-12f6	424.000	
82	Ivo Mas Tunggal	TR-0af25993-b268	14.210	
83	Ivo Mas Tunggal	TR-0af25993-b268	499.230	
84	Ivo Mas Tunggal	TR-ced66e9b-ddf2	499.340	
85	Ivo Mas Tunggal	TR-97b40df8-e6c1	574.450	
86	Ivo Mas Tunggal	TR-377bec04-0fc7	260.910	
Total			37,347.580	6,641.550

D. Records of CPO & PK Sold under other schemes since the last audit (if any)				
No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
-	-	-	-	-
-	-	-	-	-

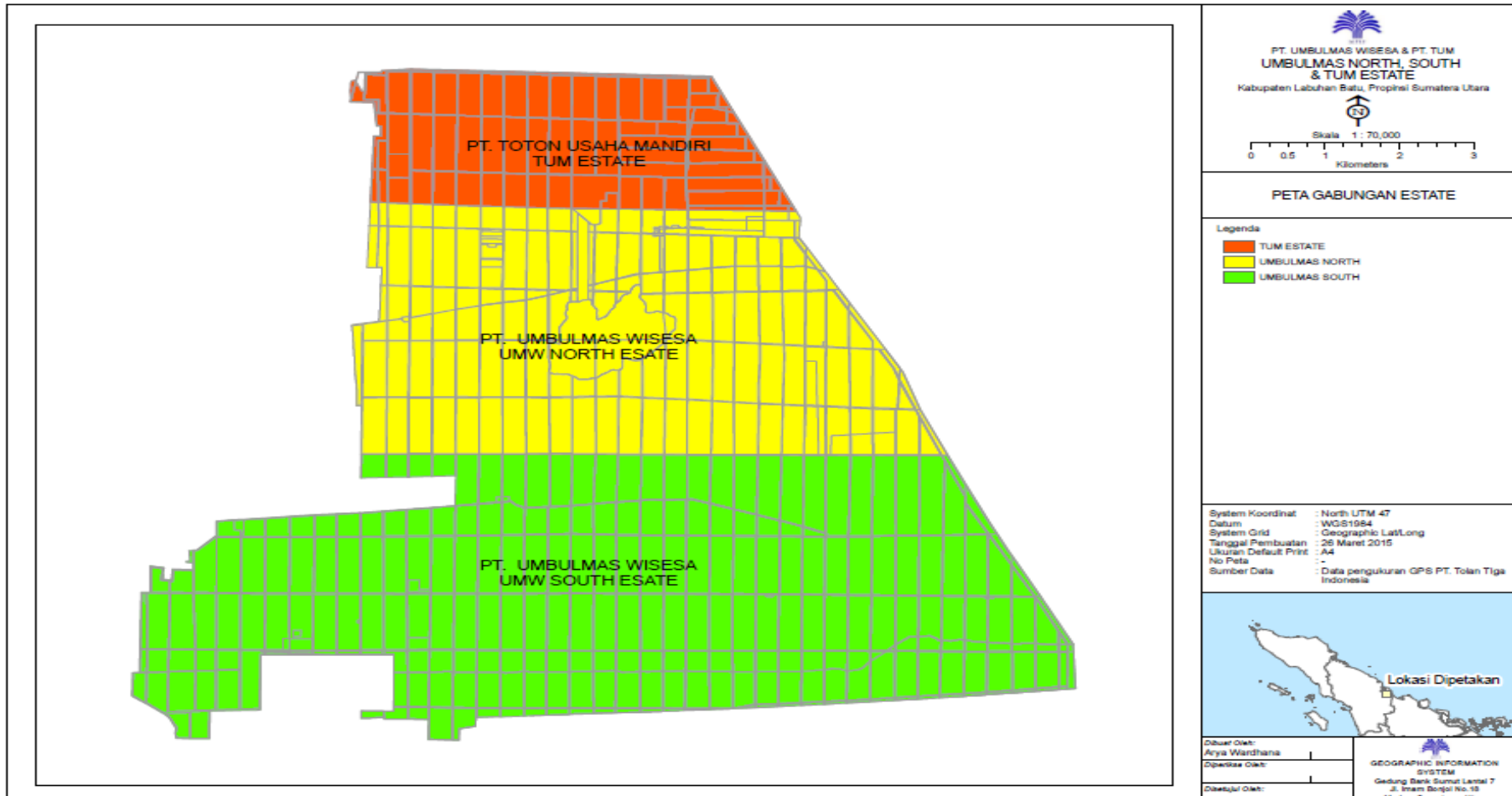
E. Records of CPO & PK Sold as conventional since the last audit (if any)			
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)
-	-	-	-
-	-	-	-

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

Appendix E: Location Map of Certification Unit and Supply bases



Appendix F: Estate Field Map



Appendix G: List of Smallholder Sampled

N/A

Appendix H: List of Abbreviations

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