

**RSPO PRINCIPLE AND CRITERIA –  
ANNUAL SURVEILLANCE ASSESSMENT (ASA1\_4)  
Public Summary Report**

<b>PT INTI INDOSAWIT SUBUR</b>
Client Company Address: <b>Jl. MH. Thamrin No.31 Jakarta 10330 Indonesia</b>
Certification Unit: PT Inti Indosawit Subur – Ukui 1 POM
Location of Certification Unit: Village of Ukui, Sub-District of Ukui, Pelalawan Regency, Riau Province, Indonesia

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## Section 1: Scope of the Certification Assessment

1. Company Details			
<b>RSPO Membership Number</b>	1-0022-06-000-00	<b>Membership Approval Date</b>	6 February 2006
<b>Parent Company Name</b>	PT Inti Indosawit Subur		
<b>Address</b>	Head Office: Jl. MH. Thamrin No.31 Jakarta 10230, Indonesia		
<b>Subsidiary (Certification Unit Name)</b>	PT Inti Indosawit Subur – Ukui 1 Palm Oil Mill		
<b>Address</b>	Village of Ukui, Sub-District of Ukui, Pelalawan District, Riau Province, Indonesia		
<b>Contact Name</b>	Mr. Ivan Novrizaldie		
<b>Website</b>	<a href="http://www.asianagri.co.id">www.asianagri.co.id</a>	<b>E-mail</b>	<a href="mailto:ivan_novrizaldie@asianagri.com">ivan_novrizaldie@asianagri.com</a>
<b>Telephone</b>	+62 21 230 1119	<b>Facsimile</b>	+62 21 230 1120

2. Certification Information			
<b>Certificate Number</b>	<b>RSPO 633774</b>	<b>Date of First Certification</b>	1 March 2011
		<b>Certificate Start Date</b>	1 March 2016
		<b>Certificate Expiry Date</b>	28 February 2021
<b>Scope of Certification</b>	Palm Oil and Palm Kernel Production of UKUI-1 Palm Oil Mill with Mass Balance Supply Chain Model (Module-E). One (1) Own Estate: Ukui Estate Nine (9) Smallholders: KUD Sumber Makmur; KUD Bina Usaha Baru; KUD Bakti; KUD Karya Bersama; KUD Sawit Subur; KUD Bina Sejahtera; KUD Sumber Bahagia; KUD Bukit Potalo; KUD Usaha Baru.		
<b>Applicable Standards</b>	<ul style="list-style-type: none"> <li>- RSPO Principles and Criteria For the Production of Sustainable Palm Oil 2018</li> <li>- RSPO Supply Chain Certification Standard 2017 requirement for CPO Mills</li> <li>- RSPO P&amp;C Certification System June 2017</li> <li>- RSPO Supply Chain Certification System 2017</li> </ul>		

3. Other Certifications			
<b>Certificate Number</b>	<b>Standard(s)</b>	<b>Certificate Issued by</b>	<b>Expiry Date</b>
ID05/65250	ISO 14001:2015	SGS	10 June 2020
EU-ISCC-Cert-DE100-20432019	ISCC (Ukui I POM)	SGS	2nd February 2020

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location [Map Reference #]	GPS Coordinates	
		Latitude	Longitude
Ukui-1 POM	Ukui village, Ukui Sub-District, Pelalawan Regency, Riau Province	00° 13' 32.09" S	102° 5' 39.84" E
Ukui Estate	Ukui village, Ukui Sub-District, Pelalawan Regency, Riau Province	00° 10' 5" - 00° 17' 18" S	102° 02' 43" - 102° 11' 37" E
KUD Sumber Makmur (781 smallholders)	Bukit Gajah village, Ukui Sub-District, Pelalawan Regency, Riau Province	00° 09' 04.5" S	102° 09' 26.1" E
KUD Bina Usaha Baru (308 smallholders)	Bukit Jaya village, Ukui Sub-District, Pelalawan Regency, Riau Province	00° 09' 35.6" S	102° 06' 22.5" E
KUD Bakti (224 smallholders)	Trimulya Jaya village, Ukui Sub-District, Pelalawan Regency, Riau Province	00° 08' 24.5" S	102° 05' 48.2" E
KUD Karya Bersama (432 smallholders)	Air Emas village, Ukui Sub-District, Pelalawan Regency, Riau Province	00° 07' 00.0" S	102° 05' 54.6" E
KUD Sawit Subur (454 smallholders)	Kampung Baru village, Ukui Sub-District, Pelalawan Regency, Riau Province	00° 09' 41.1" S	102° 03' 28.6" E
KUD Bina Sejahtera (618 smallholders)	Lubuk Kembang Sari village, Ukui Sub-District, Pelalawan Regency, Riau Province	00° 12' 06.7" S	102° 06' 17.5" E
KUD Sumber Bahagia (603 smallholders)	Silikuan Hulu village, Ukui Sub-District, Pelalawan Regency, Riau Province	00° 13' 55.8" S	102° 06' 30.6" E
KUD Bukit Potalo (247 smallholders)	Redang Seko village, Ukui Sub-District, Pelalawan Regency, Riau Province	00° 10' 56.9" S	102° 13' 12.5" E
KUD Usaha Baru (247 smallholders)	Ukui 2 village, Ukui Sub-District, Pelalawan Regency, Riau Province	00° 08' 40.6" S	102° 10' 09.0" E

5. Description of Supply Base					
Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Ukui Estate	3,375	118	72	3,565	94.67
<b>Sub-Total A</b>	<b>3,375</b>	<b>118</b>	<b>72</b>	<b>3,565</b>	
KUD Sumber Makmur (781 smallholders)	1,562	0	0	1,562	100
KUD Bina Usaha Baru (308 smallholders)	616	0	0	616	100

KUD Bakti (224 smallholders)	448	0	0	448	100
KUD Karya Bersama (432 smallholders)	864	0	0	864	100
KUD Sawit Subur (454 smallholders)	908	0	0	908	100
KUD Bina Sejahtera (618 smallholders)	1,236	0	0	1,236	100
KUD Sumber Bahagia (603 smallholders)	1,206	0	0	1,206	100
KUD Bukit Potalo (247 smallholders)	494	0	0	494	100
KUD Usaha Baru (247 smallholders)	494	0	0	494	100
	<b>7,828</b>	<b>0</b>	<b>0</b>	<b>7,828</b>	
<b>Total</b>	<b>11,203</b>	<b>118</b>	<b>72</b>	<b>11,393</b>	<b>98.33</b>

<b>6. Plantings &amp; Cycle</b>							
<b>Estate</b>	<b>Age (Years)</b>					<b>Mature**</b>	<b>Immature</b>
	<b>0 - 3</b>	<b>4 - 10</b>	<b>11 - 20</b>	<b>21 - 25</b>	<b>26 - 30</b>		
Ukui Estate	997	678	122	61	1,517	2,378	997
<b>Sub-Total A</b>	<b>997</b>	<b>678</b>	<b>122</b>	<b>61</b>	<b>1,517</b>	<b>2,378</b>	<b>997</b>
KUD Sumber Makmur (781 smallholders)	-	-	-	-	1,562	1,562	-
KUD Bina Usaha Baru (308 smallholders)	472	-	-	-	144	144	472
KUD Bakti (224 smallholders)	-	-	-	-	448	448	-
KUD Karya Bersama (432 smallholders)	-	-	-	-	864	864	-
KUD Sawit Subur (454 smallholders)	-	-	-	-	908	908	-
KUD Bina Sejahtera (618 smallholders)	-	-	-	-	1,236	1,236	-
KUD Sumber Bahagia (603 smallholders)	-	-	-	26	1,180	1,206	-

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KUD Bukit Potalo (247 smallholders)	-	-	-	494	-	494	-
KUD Usaha Baru (247 smallholders)	-	-	-	494	-	494	-
<b>Sub-Total B</b>	<b>472</b>	<b>0</b>	<b>0</b>	<b>1,014</b>	<b>6,342</b>	<b>7,356</b>	<b>472</b>
<b>Total (ha)</b>	<b>1,469</b>	<b>678</b>	<b>122</b>	<b>1,075</b>	<b>7,859</b>	<b>9,734</b>	<b>1,469</b>

<b>7. Certified Tonnage of FFB (Own Certified Scope)</b>				
Estate	Tonnage / year			
	Estimated (Mar 2019 – Feb 2020)	Actual (Dec 2018 – Nov 2019)		Forecast (Mar 2020 - Feb 2021)
		Previous license period (Dec2018 – Feb2019)	Current license period (Mar2019 – Nov2019)	
Ukui Estate	56,680	13,490	45,158	65,227
KUD Sumber Makmur (781 smallholders)	40,282.74	9,417	22,365	34,092
KUD Bina Usaha Baru (308 smallholders)	0	0	0	0
KUD Bakti (224 smallholders)	8,642.40	2,421	7,287	10,413
KUD Karya Bersama (432 smallholders)	18,391.10	5,641	16,442	23,688
KUD Sawit Subur (454 smallholders)	3,144.00	7,666	22,148	31,981
KUD Bina Sejahtera (618 smallholders)	24,021.19	2,934	7,793	11,507
KUD Sumber Bahagia (603 smallholders)	31,526.58	2,903	6,854	10,466
KUD Bukit Potalo (247 smallholders)	10,271.25	1,170	242	1,515
KUD Usaha Baru (247 smallholders)	10,359.71	7,335	20,027	29,350
<b>Total</b>	<b>203,318.97</b>		<b>201,293</b>	<b>218,239</b>

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8. Certified Tonnage of FFB (from other certified unit(s)) if applicable *				
Estate	Tonnage / year			
	Estimated (Mar 2019 – Feb 2020)	Actual (Dec 2018 – Nov 2019)		Forecast (Mar 2020 - Feb 2021)
	N/A	Previous license period (Dec2018 – Feb2019)	Current license period (Mar2019 – Nov2019)	N/A
<b>Total</b>				

9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable				
Independent FFB Supplier	Tonnage / year			
	Estimated (Mar 2019 – Feb 2020)	Actual (Dec 2018 – Nov 2019)		Forecast (Mar 2020 - Feb 2021)
		Previous license period (Dec2018 – Feb2019)	Current license period (Mar2019 – Nov2019)	
3 <sup>rd</sup> Party	159,890	28,529	74,503	130,000
<b>Total</b>	<b>159,890</b>	<b>103,032</b>		<b>130,000</b>

10. Certified Tonnage				
Mill Capacity: 70 MT/hr	Estimated (Mar 2019 – Feb 2020)	Actual (Dec 2018 – Nov 2019)		Forecast (Mar 2020 - Feb 2021)
	SCC Model: MB	<b>FFB</b>	<b>FFB</b>	
203,318.97		Previous license period (Dec2018 – Feb2019)	Current license period (Mar2019 – Nov2019)	<b>FFB</b> 218,238
		52,977	148,316	
	<b>CPO (OER:21.18%)</b>	<b>CPO (OER: 20.46%)</b>		<b>CPO (OER: 20.19%)</b>
	42,661.2	41,194.57		44,062.25
	<b>PK (KER: 5.30%)</b>	<b>PK (KER: 5.41%)</b>		<b>PK (KER: 5.24%)</b>
	10,675.37	10,892.94		11,435.67
<b>Note:</b> PK production March 2019 to November 2019 (audit on 16 December 2019) is <b>8,033.87 MT</b> , below the estimated.				



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11. Actual Sold Volume (CPO)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
<b>CPO (MT)</b>	65.44	40,885.67	0	0	40,951.11

12. Actual Sold Volume (PK)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
<b>PK (MT)</b>	9,950.87	0	0	0	9,950.87
Note: March 2019 to November 2019 (audit on 16 December 2019) is <b>7,105.59mt</b> , no exceed.					

13. Actual Group certification Claims		
	Credit	Physical Volume (MT)
<b>IS-CSPO</b>	0	0
<b>IS-CSPKO</b>	0	0
<b>IS-CSPKE</b>	0	0

## Section 2: Assessment Process

### Certification Body:

BSI Services Malaysia Sdn Bhd,  
(ASI Accreditation Number: ASI-ACC-067)  
Suite 29.01 Level 29, The Gardens North Tower,  
Mid Valley City, Lingkaran Syed Putra,  
59200 Kuala Lumpur, Malaysia.  
Tel +60 (3) 9212 9638 Fax +60 (3) 9212 9639  
Representative: Nicholas Cheong ([Nicholas.Cheong@bsigroup.com](mailto:Nicholas.Cheong@bsigroup.com))  
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BSI is a leading global provider of management systems assessment and certification, with more than 80,000 certified locations and clients in over 180 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (ASI-ACC-067) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia and an office at Jakarta and Australia which involve in RSPO Certification Program.

### 2.1 Assessment Methodology, Programme, Site Visits

The 4<sup>th</sup> Surveillance assessment was conducted from **16 – 20 December 2019**. The audit programme is included as Appendix D. The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. Mill was audited together with the sample estates. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas and local communities.

The Major NC close out on-site assessment was conducted on **19 February 2020**. The audit programmes are included in Section 2.3.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. RSPO Principles & Criteria 2013 (**RSPO Principle and Criteria 2018**) and RSPO Supply Chain Certification Standard 2017 were used to guide the collection of information to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

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

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

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

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meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and these have been incorporated into the assessment findings.

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

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

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

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

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

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

<b>Assessment Program</b>					
<b>Name (Mill / Supply Base)</b>	<b>Year 1 (Certification)</b>	<b>Year 2 (ASA 1)</b>	<b>Year 3 (ASA 2)</b>	<b>Year 4 (ASA 3)</b>	<b>Year 5 (ASA 4)</b>
Ukui – 1 POM	X	X	X	X	X
Ukui Estate	X	X	X	X	X
KUD Sumber Makmur (781 smallholders)	X		X		
KUD Bina Usaha Baru (308 smallholders)	X			X	
KUD Bakti (224 smallholders)		X	X		
KUD Karya Bersama (432 smallholders)				X	X
KUD Sawit Subur (454 smallholders)		X			
KUD Bina Sejahtera (618 smallholders)		X		X	
KUD Sumber Bahagia (603 smallholders)					X

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KUD Bukit Potalo (247 smallholders)	X		X		
KUD Usaha Baru (247 smallholders)					X

**Tentative Date of Next Visit: December 14, 2020 – December 19, 2020**

**Total No. of Mandays: 28.5 Mandays on site**

**2.2 BSI Assessment Team:**

<b>Team Member Name</b>	<b>Role</b> <i>(Team Leader or Team member)</i>	<b>Qualifications</b> <i>(Short description of the team members)</i>
Yudwi Wisnu Rahmanto (YR)	Team Leader	Bachelor of Forestry with Silviculture background. He worked at professional independent Certification Body as an Auditor for last 8 years and has involved in auditing activities with various certification schemes. Selected training which have been followed, such as RSPO Endorsed Lead Auditor Training Course, RSPO NEXT, ISPO Auditor/Lead Auditor Course, Quality Management System (QMS) ISO 9001:2008 Auditor/Lead Auditor Course, GIS-Basic Mapping and Spatial Analysis, Timber Legality Assurance System (SVLK), Verification Organization Training C.A.F.E Practices (Starbucks), UTZ Programme and others internal training programs. He has involved in auditing activities, such as Sustainable Forest Management by FSC FM/COC Scheme, Sustainable Palm Oil by RSPO and ISPO Scheme, Coffee And Farmer Equity (C.A.F.E Practices) Starbucks, Organic Standard (EU, NOP, JAS) for Coffee Farmers and Organic Exchange for Textile. During this assessment, he assessed on the aspects of legal and social aspect.
Mujinus Jalaraya (MJ)	Team Member	He hold Bachelor degree from Faculty of Forestry, Bogor Agricultural University (IPB) in 2008, Majoring in Forest Resources Conservation and Ecotourism. He have a working experience in palm oil plantations as SHE Assistant at PT. Astra Agro Lestari Tbk in 2008 - 2012 and as Supervisor Sustainability at Teladan Prima Group in 2012 – 2014. He involved in RSPO certification since 2014 as a team member subsequently as a Lead Auditor. He has completed the training, such as: Lead Auditor ISO 9001: 2008 course, Lead Auditor ISPO course, Lead Auditor RSPO endorsed course, RSPO SCCS Lead Auditor endorsed course, HCV Identification and management, Internal Auditor ISO 14001: 2004 Training, Training for Trainers, OHS Expert Training, etc. He is fluently speaking in English and Bahasa Indonesia. During this assessment, he assessed on social, conservation and environmental aspects.
Eko Purwanto (EP)	Team Member	He graduated as Bachelor of Forestry from Forest Conservation Department, Faculty of Forestry, Bogor Agricultural University (IPB) in 2001. He owned working experience at Oil Palm Plantation in East Kalimantan since 2003 to 2012, the last position was Estate Manager. He has implemented good

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		agricultural practice including integrated pest management and limited pesticides uses. He has been trained for lead auditor of 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 (Oil and Automotive) Indonesia (2011) and Introduction to HCV Toolkit HCV (2011). Since October 2012 he has been involved in quality (ISO 9001) management system audits for very broad industrial and involved in Indonesia Sustainable Palm Oil (ISPO) and RSPO P&C audit for several plantations and mills, also RSPO Supply Chain audit for several KCP, Bulking and Refinery. During this assessment, he assessed on supply chain and social aspects.
Imam Fakhrurozi (IF)	Team Member	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 occupational, safety and health aspects.
Edy Widodo (EW)	Team Member	Edy Widodo graduated as bachelor of the Faculty of Agriculture, Department of Agricultural Technology, University of Padjadjaran, Bandung. Earlier he worked as an Assistant Estates Manager in PT SMART Tbk. (1999 to 2005). He is the Lead Auditor for ISO 9001: 2008. He has working experience in the industrial sector and audit Plantation, and also the processing industry and agricultural mechanization. He is also the ISPO auditor who has obtained a certificate from the ISPO Commission, Ministry of Agriculture of Indonesia, on February 2013. He had got a certificate of training on Understanding ISO 14001: 2004 & Auditing ISO 14001: 2004 in 2013. He also had joined RSPO P&C training (2013) and also Course RSPO Lead Auditor 2016 - RSPO Endorsed RSPO Supply Chain Certification Training Course on April 2016. During this assessment, he assessed on social, worker welfare and gathering information from stakeholder (internal and external).
Andi Pratama Pasaribu (AP)	Team Member	Indonesian citizen. Bachelor degree, majoring social economy. He has several of work experiences (more than 5 years) as the operational staff since 2008. He has been followed the Training of Lead Auditor Indonesian Sustainable Palm Oil (ISPO) which was held by ISPO Commission in 2013 and Training of Lead Auditor Roundtable on Sustainable Palm Oil (RSPO) by Proforest and Daemeter in 2016. He has been attended several kinds of training, such as High Conservation Value (HCV) Training, Lead Auditor ISO 9001:2008, Lead Auditor ISO 14001:2005, auditor OHSAS, lead auditor RSPO supply chain by BMTRADA etc. He has some experiences of Sustainability Palm Oil scheme audit in Indonesian and Malaysia in best management practices, land legality, environmental, social and worker welfare aspect and supply chain. During this assessment, he assessed best management practices aspect.

**Accompanying Persons: Nil**

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**2.3 Assessment Plan**

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

Date	Time	Subjects	YR	MJ	EP	EW	AP	IF	
			PRSPOLA/SA	PRSPOLA/PRSPODHS/EMS	PRSPOLSCC/OHS/EMS	PRSPOL-T OHS/EMS/SA		PRSPOLA/PRSPOL-OHS/EMS	
Sun, 15/12/2019	14.00 – 15.50	Flight Jakarta – Pekanbaru for <b>Imam Fahrurozi</b>	Stay onsite						√
	15.50 – 21.00	Travelling to Ukui-1 POM						√	
Mon, 16/12/2019	08.00 – 08.30	Opening meeting <ul style="list-style-type: none"> <li>Auditee Speech (Introduction of PIC, Profile of Certified Management Unit)</li> <li>Auditor Team Speech (Introduction, Audit Objective, Audit Scope, Audit Plan Discussion, Determine of Audit Sample, Transparency and Confidentiality Clarification)</li> </ul>	√	√	√	√	√	√	
	08.30 – 12.00	Field visit to <b>Ukui Estate</b> : <ul style="list-style-type: none"> <li>Implementation of Agronomy Aspect</li> <li>Implementation of Environmental, Conservation and Waste Management Aspect</li> <li>Implementation of Occupational Health &amp; Safety Aspect</li> <li>Implementation of Legal Aspect and Land Rights</li> <li>Consultation with external stakeholders (relevant government agencies), NGO and affected villages</li> </ul>	√	√	√	√	√	√	
	12.00 – 14.00	Lunch Break	√	√	√	√	√	√	

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Date	Time	Subjects	YR	MJ	EP	EW	AP	IF
			PRSPOLA/SA	PRSPOLA/PRSPODHS/EMS	PRSPOSCC/OHS/EMS	PRSPOT-OHS/EMS/SA		PRSPOLA/PRSPO-OHS/EMS
	14.00 – 17.00	Document Review Ukui Estate: <ul style="list-style-type: none"> <li>- Legal &amp; Land Rights</li> <li>- Social and Transparency</li> <li>- Environmental, Waste Management &amp; HCV</li> <li>- Occupational Health &amp; Safety</li> <li>- Best Management Practices</li> <li>- Worker Welfare</li> <li>- Verification of Basic Information (Mill and supply bases)</li> <li>- Review of previous assessment findings.</li> </ul>	√	√	√	√	√	√
Tue, 17/12/2019	08.00 – 12.00	Field observation to: <b>KUD Sumber Bahagia (scheme Smallholders)</b> <b>Aspect to be observe:</b> <ul style="list-style-type: none"> <li>• Implementation of Agronomy Aspect</li> <li>• Implementation of Environmental, Conservation and Waste Management Aspect</li> <li>• Implementation of Occupational Health &amp; Safety Aspect</li> <li>• Implementation of Legal Aspect and Land Rights</li> <li>• Consultation with internal stakeholders (village head, cooperative management), local contractor (if any)</li> </ul> <b>Sample taken : 28 smallholders plot</b>	√	√	√	√	√	√
	12.00 – 14.00	Lunch Break	√	√	√	√	√	√

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Date	Time	Subjects	YR	MJ	EP	EW	AP	IF
			PRSPOLA/SA	PRSPOLA/PRSPODHS/EMS	PRSPOLSCC/OHS/EMS	PRSPOL-T OHS/EMS/SA		PRSPOLA/PRSPOL-OHS/EMS
	14.00 – 17.00	<p>Field observation to: <b>KUD Karya Bersama (scheme Smallholders)</b></p> <p><b>Aspect to be observe:</b></p> <ul style="list-style-type: none"> <li>• Implementation of Agronomy Aspect</li> <li>• Implementation of Environmental, Conservation and Waste Management Aspect</li> <li>• Implementation of Occupational Health &amp; Safety Aspect</li> <li>• Implementation of Legal Aspect and Land Rights</li> <li>• Consultation with internal stakeholders (village head, cooperative management), local contractor (if any)</li> </ul> <p><b>Sample taken : 13 smallholders plot</b></p>	√	√	√	√	√	√
Wed, 18/12/2019	08.00 – 12.00	<p>Field observation to: <b>KUD Usaha Baru (scheme Smallholders)</b></p> <p><b>Aspect to be observe:</b></p> <ul style="list-style-type: none"> <li>• Implementation of Agronomy Aspect</li> <li>• Implementation of Environmental, Conservation and Waste Management Aspect</li> <li>• Implementation of Occupational Health &amp; Safety Aspect</li> <li>• Implementation of Legal Aspect and Land Rights</li> <li>• Consultation with internal stakeholders (village head, cooperative management), local contractor (if any)</li> </ul> <p><b>Sample taken : 18 smallholders plot</b></p>	√	√	√	√	√	√
	12.00 – 14.00	Lunch Break	√	√	√	√	√	√



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Date	Time	Subjects	YR	MJ	EP	EW	AP	IF
			PRSPO-LA/SA	PRSPO-LA/PRSPO-OHS/EMS	PRSPO-SCC/OH S/EMS	PRSPO-T OHS/EMS/SA		PRSPO-LA/PRSPO-OHS/EMS
	14.00 – 17.00	Document Review Smallholders Estate: <ul style="list-style-type: none"> <li>- Legal &amp; Land Rights</li> <li>- Social and Transparency</li> <li>- Environmental, Waste Management &amp; HCV</li> <li>- Occupational Health &amp; Safety</li> <li>- Best Management Practices</li> <li>- Worker Welfare</li> <li>- Verification of Basic Information</li> <li>- Review of previous assessment findings.</li> </ul>	√	√	√	√	√	√
Thu, 19/12/2019	08.00 – 12.00	Field visit to <b>Ukui-1 POM</b> : <ul style="list-style-type: none"> <li>• BMP for Mill Processing – site visit</li> <li>• Occupational Health &amp; Safety Aspect (Inspection to Chemical Storage, Hazardous Waste Storage, Fire Control Simulation, Processing Activities)</li> <li>• Implementation of Environmental and Waste Management Aspect (POME Pond, Empty Bunch Area, Reservoir/Intake Point, Biogas Plant – <i>if any</i>)</li> <li>• Consultation with internal stakeholders (gender committee, labor union), local contractor (if any)</li> <li>• Consultation with external stakeholder – Tesso Nilo National Park (visit) at Pangkalan Kerinci.</li> </ul> <p>Supply Chain for CPO Mill (site visit) - FFB Receiving, Weighbridge, Dispatch CPO.</p>	√	√	√	√	√	√
	12.00 – 14.00	Lunch Break	√	√	√	√	√	√

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Date	Time	Subjects	YR	MJ	EP	EW	AP	IF
			PRSPOLA/SA	PRSPOLA/PRSPODHS/EMS	PRSPOLSCC/OHS/EMS	PRSPOL-T OHS/EMS/SA		PRSPOLA/PRSPOL-OHS/EMS
	14.00 – 17.00	Supply Chain for CPO Mill (continued) Document Review UKUI-1 POM: <ul style="list-style-type: none"> <li>- Legal &amp; Land Rights</li> <li>- Social and Transparency</li> <li>- Environmental, Waste Management &amp; HCV</li> <li>- Occupational Health &amp; Safety</li> <li>- Best Management Practices</li> <li>- Worker Welfare</li> </ul> Review of previous assessment findings.	√	√	√	√	√	√
Fri, 20/12/2019	08.00 – 10.00	<b>Audit Report Preparation</b>	√	√	√	√	√	√
	10.00 – 11.00	Closing Meeting <ul style="list-style-type: none"> <li>• Presentation of audit findings (Noteworthy Positive Component, Non Conformities, OFI, Timelie of CAR's, Conclusion)</li> <li>• Comments, Responses and Questions</li> </ul>	√	√	√	√	√	√
	11.00 – 16.00	Traveling Ukui - Pekanbaru	√	√	√	√	√	√
	18.55 – 20.45	Return Flight (Pekanbaru – Jakarta)	√	√	√	√	√	√

### Section 3: Assessment Findings

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

- PT Inti Indosawit Subur Time Bound Plan
- RSPO P&C 2018 Generic
- RSPO Group Certification Standard 2016
- RSPO Supply Chain Certification Standard 2017

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

Time Bound Plan		
Requirement	Remarks	Compliance
Does the plan include all current subsidiaries, estates and mills?	PT. Inti Indosawit Subur – Asian Agri Group has explained the certification plan for all of its subsidiaries; indicating all palm oil mills, company-owned estates and scheme smallholder as the supply base.	Comply
Have all the estates and mills certified within five years after obtaining RSPO membership?	Based on Time Bound Plan revising in December 2018, Segati Mill (PT Mitra Unggul Pusaka) located in Pelalawan, Riau postponed to Re-Audit in year 2020. Status of RaCP and relevant issues are still in progress and waiting for RSPO feedback.	Comply
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three-year from the date of acquisition. Certification plan for the new acquisition shall be available.	No new acquisition.	Comply
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?	There is no changes from previous audit	Comply
Have there been any isolated lapses in implementation of the plan? If yes a <b>Minor</b> non-compliance shall be raised	No	Comply
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a <b>Major</b> non-compliance shall be raised	No	Comply
Have there been any stakeholder comments?	Yes, stakeholder comment is presented within this report.	Comply
Un-Certified Units or Holdings		
No replacement after dates defined in NIs Criterion 7.3:	Based on Time Bound Plan revising in December 2018, Segati Mill (PT Mitra Unggul Pusaka)	Comply

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<ul style="list-style-type: none"> <li>• Primary forest.</li> <li>• Any area required to maintain or enhance HCVs in accordance with RSPO P&amp;C criterion 7.3.</li> </ul>	located in Pelalawan, Riau postponed to Re-Audit in year 2020. Status of RaCP and relevant issues are still in progress and waiting for RSPO feedback.	
Any new plantings since January 1 <sup>st</sup> 2010 shall comply with the RSPO New Plantings Procedure.	Based on Time Bound Plan revising in December 2018, Segati Mill (PT Mitra Unggul Pusaka) located in Pelalawan, Riau postponed to Re-Audit in year 2020. Status of RaCP and relevant issues are still in progress and waiting for RSPO feedback.	Comply
Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 2.2, 6.4, 7.5 and 7.6. The RSPO RaCP tracker shall be checked to confirm for any land conflicts/Liabilities <a href="https://www.rspo.org/certification/remediation-and-compensation/racp-tracker">https://www.rspo.org/certification/remediation-and-compensation/racp-tracker</a> . The progress on the Liabilities shall be verified and reported.	Based on Time Bound Plan revising in December 2018, Segati Mill (PT Mitra Unggul Pusaka) located in Pelalawan, Riau postponed to Re-Audit in year 2020. Status of RaCP and relevant issues are still in progress and waiting for RSPO feedback.	Comply
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3.	Based on Time Bound Plan revising in December 2018, Segati Mill (PT Mitra Unggul Pusaka) located in Pelalawan, Riau postponed to Re-Audit in year 2020. Status of RaCP and relevant issues are still in progress and waiting for RSPO feedback.	Comply
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	Based on Time Bound Plan revising in December 2018, Segati Mill (PT Mitra Unggul Pusaka) located in Pelalawan, Riau postponed to Re-Audit in year 2020. Status of RaCP and relevant issues are still in progress and waiting for RSPO feedback.	Comply
Did the company conduct internal audit against the uncertified management units requirement? If yes, a positive assurance statement shall be available.	Based on Time Bound Plan revising in December 2018, Segati Mill (PT Mitra Unggul Pusaka) located in Pelalawan, Riau postponed to Re-Audit in year 2020. Status of RaCP and relevant issues are still in progress and waiting for RSPO feedback.	Comply

**3.3 Progress of scheme smallholders and/or outgrowers**

<b>Progress of scheme smallholders or outgrowers towards compliance with relevant standards</b>		
<b>Requirement</b>	<b>Remarks</b>	<b>Compliance</b>
Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification?	There is only two smallholders: Penarikan KKPA and Gunung Sahilan KKPA that not been certified within three years. It is due to	Comply

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<p>OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years.</p>	<p>Segati Mill not yet certified and still on progress for Land Use Change.</p>	
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**3.4 Details of findings**

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

During the 4<sup>th</sup> Surveillance Assessment there were **four (4) Major & one (1) Minor** nonconformities raised. The **Ukui – 1 POM** Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

Non-conformity			
<b>NCR Ref #</b>	1861408-201911-M1	<b>Clause &amp; Category (Major / Minor)</b>	5.6.1 Supply Chain Mill Requirements Module-E
<b>Date Issued</b>	20 Dec 2019	<b>Due Date</b>	18 Mar 2020
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	19 Feb 2020
<b>Statement of Nonconformity:</b>	There are discrepancy between Shipping Announcement of CSPO and CSPK in Palm Trace compare to CSPO and CSPK delivery according to monthly Book Keeping of Ukui I POM during period December 2018 to November 2019. It was indicated over sold volume of CSPO and CSPK.		
<b>Requirement Reference:</b>	<p>5.6.1 Sales and Goods Out (Supply Chain Mill Requirements Module-E)</p> <p>The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form: The name and address of the buyer;</p> <ul style="list-style-type: none"> <li>• The name and address of the seller;</li> <li>• The loading or shipment / delivery date;</li> <li>• The date on which the documents were issued;</li> <li>• A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations);</li> <li>• The quantity of the products delivered;</li> <li>• Any related transport documentation;</li> <li>• Supply chain certificate number of the seller;</li> <li>• A unique identification number.</li> </ul> <p>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> <ul style="list-style-type: none"> <li>• For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements / Announcements and Confirmations on the</li> </ul>		

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	RSPO IT platform per shipment or group of shipments.																																				
<b>Objective Evidence:</b>	<ol style="list-style-type: none"> <li>1. According to CSPO delivery based on monthly Book Keeping record of Ukui I POM, for period December 2018 to November 2019, there was no delivery of RSPO certified CPO. Whilst according to RSPO PalmTrace Transaction, there was CSPO sold 65.44 MT on 18/09/2019 under transaction ID: TR-88a61ed6-7acb. Internal Audit on 23 Oct 2019 has found this discrepancy and correction has been made by issuing DO No.11015/DC10/02/19 dated 15 Nov 2019 and crried out delivery based on Weighbridge Card No. PUSC119202426, PUSC119202427 and PUSC119202428 dated 04/12/2019; however, root cause analysis and corrective action were not available.</li> <li>2. According to CSPK delivery based on monthly Book Keeping record of Ukui I POM, for period December 2018 to November 2019, CSPK delivery to Ukui I KCP was 10,625.00 MT. Whilst according to RSPO PalmTrace Transaction, since December 2018 to November 2019, Shipping Announcement made for CSPK was 12,444.05 MT. There is discrepancy of CSPK sold volume in RSPO PalmTrace with amount 1,819.05 MT.</li> </ol>																																				
<b>Corrections:</b>	<ul style="list-style-type: none"> <li>- PT IIS Ukui I – POM has shown the correction on issuing DO No.11015/DC10/02/19 dated 15 Nov 2019 and delivery based on Weighbridge Card No. PUSC119202426, PUSC119202427 and PUSC119202428 dated 04/12/2019. Rootcause analysis, correction and corrective action has been shown as per report of Internal Audit dated 23 October 2019. Rootcause analysis stated that an error announcement was made by the logistics department due to miscommunication and lack of coordination between Marketing/Logistic team Head office and Ukui I POM. Palmtrace announcement was done by Marketing/Logistic team Head office, whilst delivery and book keeping record was done by Ukui I POM; Correction and corrective action to address the issue has been taken.</li> <li>- PT IIS Ukui I – POM has shown the correction on the book keeping record at Palm Oil Mill coordination with Marketing/Logistic team Head office to provide the information of palmtrace announcement. The book keeping record has included the information of RSPO palmtrace announcement for CSPO and CSPKO. The information is necessary to monitor the CSPO and CSPKO transaction on palmtrace to prevent the exceed volume transaction according to delivery of CSPO and CSPK. During verification audit, POM unit can be demonstrated that actually there is no discrepancy of CSPK delivery and Palmtrace transaction. The amount of 1,819.05 MT CSPK palmtrace transaction was taken from delivery CSPK September – November which was 2,442.23 MT; While the shipping announcement was done on December 2018. Below are the description of CSPK delivery and CSPK transaction on Palmtrace:</li> </ul> <table border="1" data-bbox="416 1655 1473 2029"> <thead> <tr> <th>Month</th> <th>RSPO CSPK Delivery</th> <th>Shipping Announcement RSPO</th> <th>Transaction date</th> </tr> </thead> <tbody> <tr> <td>September 2018</td> <td>332.08</td> <td>290.08</td> <td>-</td> </tr> <tr> <td>October 2018</td> <td>1,063.16</td> <td>1,187.73</td> <td>-</td> </tr> <tr> <td>November 2018</td> <td>1,046.99</td> <td>1,015.37</td> <td>-</td> </tr> <tr> <td>December 2018</td> <td>937.29</td> <td>932.24</td> <td>2,493.18</td> </tr> <tr> <td>January 2019</td> <td>893.31</td> <td>847.55</td> <td>932.24</td> </tr> <tr> <td>February 2019</td> <td>891.26</td> <td>1,065.49</td> <td>847.55</td> </tr> <tr> <td>March 2019</td> <td>878.01</td> <td>832.09</td> <td>1,065.49</td> </tr> <tr> <td>April 2019</td> <td>801.13</td> <td>781.34</td> <td>-</td> </tr> </tbody> </table>	Month	RSPO CSPK Delivery	Shipping Announcement RSPO	Transaction date	September 2018	332.08	290.08	-	October 2018	1,063.16	1,187.73	-	November 2018	1,046.99	1,015.37	-	December 2018	937.29	932.24	2,493.18	January 2019	893.31	847.55	932.24	February 2019	891.26	1,065.49	847.55	March 2019	878.01	832.09	1,065.49	April 2019	801.13	781.34	-
Month	RSPO CSPK Delivery	Shipping Announcement RSPO	Transaction date																																		
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	<table border="1"> <tr> <td>May 2019</td> <td>902.63</td> <td>910.90</td> <td>1,504.06</td> </tr> <tr> <td>June 2019</td> <td>945.17</td> <td>868.05</td> <td>109.37</td> </tr> <tr> <td>July 2019</td> <td>1,020.30</td> <td>1,086.19</td> <td>910.90</td> </tr> <tr> <td>August 2019</td> <td>750.16</td> <td>740.55</td> <td>-</td> </tr> <tr> <td>September 2019</td> <td>937.90</td> <td>865.90</td> <td>1,954.24</td> </tr> <tr> <td>October 2019</td> <td>1,022.77</td> <td>1,020.57</td> <td>-</td> </tr> <tr> <td>November 2019</td> <td>707.79</td> <td></td> <td>2,627.02</td> </tr> <tr> <td>Total</td> <td>13,129.95</td> <td>12,444.05</td> <td>12,444.08</td> </tr> </table> <p>So that according to the RSPO CSPK Delivery September 2018 to November 2019 compare to RSPO shipping announcement, the number of delivery CSPK is 13,129.95 MT while the Palmytrace announcement during that period was 12,444.05 MT, the rest of CSPK is becoming stock.</p>	May 2019	902.63	910.90	1,504.06	June 2019	945.17	868.05	109.37	July 2019	1,020.30	1,086.19	910.90	August 2019	750.16	740.55	-	September 2019	937.90	865.90	1,954.24	October 2019	1,022.77	1,020.57	-	November 2019	707.79		2,627.02	Total	13,129.95	12,444.05	12,444.08
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Total	13,129.95	12,444.05	12,444.08																														
<b>Root Cause Analysis:</b>	<ul style="list-style-type: none"> <li>- An error announcement was made by the logistics department due to miscommunication and lack of coordination between Marketing/Logistic team Head office and Ukui I POM.</li> <li>- Palmtrace announcement was done by Marketing/Logistic team Head office, whilst delivery and book keeping record was done by Ukui I POM; Lack of coordination between marketing team and POM unit so that there is a discrepancy of CSPO/CSPK delivery &amp; announcement.</li> <li>- Lack of monitoring from sustainability team regarding Book Keeping and Palmtrace announcement/transaction.</li> </ul>																																
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>- Requests for CSPO announcements are made based on Ukui I POM delivery of CSPO/CSPK, to ensure that the actual CSPO sent actually comes from Ukui I POM, the information of which will be conveyed by the sustainability officer to the logistics party as the basis for the announcement (Maximum 3 months). Sustainability team Jakarta has brief the information to Marketing/Logistic team Head office and Ukui I POM through Sustainability Ukui Group.</li> <li>- Add Announcement Column and Transaction Date Column (to ensure the volume checked by the auditor will be the same, based on the download period on palmtrace) and Refresh Socialization related to mass balance format with additional announcement columns specifically for RSPO SCCS. Book keeping record at Ukui I POM has been change as per document record keeping period January – December 2019. Record keeping has include the information of CPO/PK production certified and non certified, delivery CPO/PK certified and non certified, first stock and final stock CPO &amp; PK certified and non certified, CPO/PK sold as certified and non certified, CSPO/CSPK Palmtrace announcement and date of transaction. During audit verification, record keeping period January – December 2018 and 2019 can be demonstrated and found completed and balance between production, delivery, sales and stock.</li> <li>- Sustainability team Jakarta and Ukui Group has monitor each month the record keeping. Latest monitoring conducted on January 2020. According to latest monitoring, there is no discrepancy of CPO/PK delivery and sales.</li> </ul>																																
<b>Assessment Conclusion:</b>	<p>NC Closure Visit 19 Feb 2020:</p> <p>Based on document verification and interview with PIC Supply Chain at Ukui-1 Mill, it is clear that book keeping record of certified product, including sales announcement and transaction record already synchronize with database from Sales Department at Head Office.</p> <p>According to corrective action made and based on field verification during NCR Major visited on 19 February 2020, this NC is closed satisfactorily.</p>																																



Non-conformity			
<b>NCR Ref #</b>	1861408-201911-M2	<b>Clause &amp; Category (Major / Minor)</b>	4.1.1 (C)
<b>Date Issued</b>	20 Dec 2019	<b>Due Date</b>	18 Mar 2020
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	19 Feb 2020
<b>Statement of Nonconformity:</b>	Unit of Certification cannot demonstrated policy of human right that include prohibiting retaliation against Human Rights Defenders (HRD), prohibitions of intimidation and harassment by the unit of certification and contracted services.		
<b>Requirement Reference:</b>	4.1.1 (C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, supply chain and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.		
<b>Objective Evidence:</b>	PT. Inti Indosawit Subur already has a Policy to respect human rights as outlined in the Corporate Policy issued by the Managing Director of Asian Agri on 1 December 2014, especially at Point 13. However, the policy does not mentioned about prohibiting retaliation against Human Rights Defenders (HRD), prohibits intimidation and harassment by the unit of certification and contracted services.		
<b>Corrections:</b>	<ul style="list-style-type: none"> <li>- PT IIS Ukui I POM has made coordination with Jakarta Regional Office (JRO) to follow up an update corporate policy. PT Inti Indosawit Subur under Asian Agri Group has issued the corporate policy under "Kebijakan Perusahaan" updated on 31 December 2019 signed by Managing Director. In particular of human right policy, company has issued "Human Rights Policy" dated 1 December 2019 and signed by Managing Director. Asian Agri respect and support the Universal Declaration of Human Rights (UDHR) as well as the international labour organization declaration on fundamental principles and rights at work. Asian Agri have pledged itself to achieve the promotion of universal respect for and observance of human rights and fundamental freedoms. The document is based on the United Nations (UN) Guiding principles on Business and Human Rights framework to guide the development and implementation of Human rights. Human right policy cover 6 aspect of workplace right and community right including grievance of whistle blowing. Details on requirements to protect the rights of Human Right Defenders, including complainants, whistleblowers and community spokespersons, are set out in "Memorandum No: 005/GM-KUK/MEMO/02/20 dated 10 February 2020 "Kebijakan Melarang Adanya Tindakan Balas Dendam, Intimidasi, dan Pelecehan untuk Pelapor/Pembela Hak Asasi Manusia (Human Right Defender). To protect the complainants, whistleblowers and community spokespersons company also has a procedure of "Penyampaian dan Penyelesaian keluhan karyawan" SOP No: AA-HR-308.5-R1 dated 5 December 2019.</li> <li>- Policy, mechanism and procedure above has been disseminated to all employee and stakeholder on 10 – 15 February 2020. Evidence of socialization can be demonstrated during audit verification such as: attendant list, photo documentation. Company also provide the policy in the banner which installed in the strategic place (in front of estate/division office and main road). During interview with workers at Ukui I Estate and</li> </ul>		

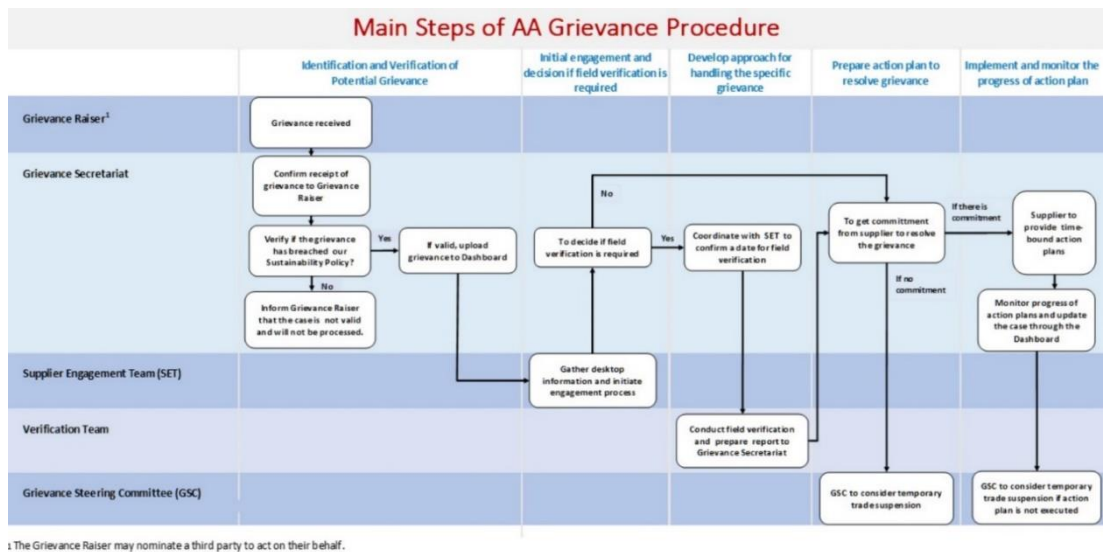


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	smallholder confirmed that they have understand on the company policy regarding Human Right Defenders, including complainants, whistleblowers and community spokespersons.
<b>Root Cause Analysis:</b>	Human right policy was not updated and adjust to new RSPO standard, the new policy has not been approved by top management.
<b>Corrective Actions:</b>	<p>Kept the updated company policy and filed in soft and hard copies and disseminated to all employees. Updating the company pollicy according to current RSPO standard and relevant regulation and disseminated to all employees.</p> <p>NC Closure Visit 19 Feb 2020:</p> <p>PT IIS – Ukui I POM has kept the current corporate policy “Kebijakan Perusahaan” “Kebijakan Perusahaan” updated on 31 December 2019 signed by Managing Director. In particular of human right policy, company has issued “Human Rights Policy” dated 1 December 2019 and signed by Managing Director. Details on requirements to protect the rights of Human Right Defenders, including complainants, whistleblowers and community spokespersons, are set out in “Memorandum No: 005/GM-KUK/MEMO/02/20 dated 10 February 2020 “Kebijakan Melarang Adanya Tindakan Balas Dendam, Intimidasi, dan Pelecehan untuk Pelapor/Pembela Hak Asasi Manusia (Human Right Defender).</p> <p>To protect the complainants, whistleblowers and community spokespersons company also has a procedure of “Penyampaian dan Penyelesaian keluhan karyawan” SOP No: AA-HR-308.5-R1 dated 5 December 2019.</p>
<b>Assessment Conclusion:</b>	<p>NC Closure Visit 19 Feb 2020:</p> <p>Based on interview with 3 workers at Ukui-1 Mill, Ukui Estate and sample of smallholders it is informed that the workers and smallholders already aware with the Policy of Human Right Defender. According to corrective action made and based on field verification during NCR Major visited on 19 February 2020, this NC is closed satisfactorily.</p>

Non-conformity			
<b>NCR Ref #</b>	1861408-201911-M3	<b>Clause &amp; Category (Major / Minor)</b>	4.2.1 (C)
<b>Date Issued</b>	20 Dec 2019	<b>Due Date</b>	18 Mar 2020
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	19 Feb 2020
<b>Statement of Nonconformity:</b>	Resolve disputes system which developed by unit of certification is not follows the RSPO policy on respect for Human Right Defender (HRD).		
<b>Requirement Reference:</b>	4.2.1 (C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.		
<b>Objective Evidence:</b>	<ul style="list-style-type: none"> <li>Company Policy related to respect for Human Right Defender (HRD) without risk of reprisal or intimidation is not approved.</li> <li>SOP Penanganan Keluhan Masyarakat No: AA-GL-510.1-R0, dated 1 January 2013 was not refer to policy on respect for HRD.</li> </ul>		

<p><b>Corrections:</b></p>	<p>PT IIS – Ukui Group has updated the procedure of grievances and complaint handling as per “SOP Penyampaian dan Penyelesaian keluhan karyawan” SOP No: AA-HR-308.5-R1 dated 5 December 2019. This procedure is to handling the internal grievances and complaint handling from employee. This procedure has include the mechanism of protection to Human Right Defenders, including complainants, whistleblowers and spokespersons.</p> <p>In particular of human right policy, company has issued “Human Rights Policy” dated 1 December 2019 and signed by Managing Director. Details on requirements to protect the rights of Human Right Defenders, including complainants, whistleblowers and community spokespersons, are set out in “Memorandum No: 005/GM-KUK/MEMO/02/20 dated 10 February 2020 “Kebijakan Melarang Adanya Tindakan Balas Dendam, Intimidasi, dan Pelecehan untuk Pelapor/Pembela Hak Asasi Manusia (Human Right Defender).</p> <p>The external grievances and complaint handling was stipulated as per “Mekanisme Keluhan” which provided in the Website of Asian Agri and can be accessed by all stakeholder of Asian Agri at <a href="https://www.asianagri.com/id/panel-keberlanjutan/keluhan-pengaduan">https://www.asianagri.com/id/panel-keberlanjutan/keluhan-pengaduan</a> .</p> <ul style="list-style-type: none"> <li>- Asian Agri stakeholders include but are not limited to the Government, farmers, suppliers, vendors, academics, NGOs, media, etc., provided different complaint channels to report their complaints / findings. Reporters can submit complaints and information related to business violations, corruption, harassment, criminal acts, the environment, and others. All reports are confidential and if deemed appropriate, updates will be publicly available according to Grievance Mechanism:</li> </ul>
<p><b>Root Cause Analysis:</b></p>	<p>The updated SOP for handling public complaints containing Human Rights Defenders (HRD) is still in the process of revision and Approved by management.</p>
<p><b>Corrective Actions:</b></p>	<p>Updated complaints handling SOPs are stored and filed in soft and hard copies and disseminated to employees.</p> <p>NC Closure Visit 19 Feb 2020:</p> <p>Dissemination of procedure and policy has been conducted on 10 – 15 February 2020.</p> <p><b>Evidence of socialization can be demonstrated during audit verification such as:</b></p>



1. The Grievance Raiser may nominate a third party to act on their behalf.

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	<p>attendant list, photo documentation. Company also provide the policy in the banner which installed in the strategic place (in front of estate/division office and main road).</p> <p>During interview with worklers at Ukui I Estate and smallholder confirmed that they have understand on the company policy regarding Human Right Defenders, including complainants, whistleblowers and community spokespersons.</p>
<b>Assessment Conclusion:</b>	<p>NC Closure Visit 19 Feb 2020:</p> <p>Based on interview with 3 workers at Ukui-1 Mill, Ukui Estate and sample of smallholders it is informed that the workers and smallholders already aware with the Policy of Human Right Defender. According to corrective action made and based on field verification during NCR Major visited on 19 February 2020, this NC is closed satisfactorily.</p>

Non-conformity			
<b>NCR Ref #</b>	1861408-201911-M4	<b>Clause &amp; Category (Major / Minor)</b>	6.7.3 (C)
<b>Date Issued</b>	20 Dec 2019	<b>Due Date</b>	18 Mar 2020
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	19 Feb 2020
<b>Statement of Nonconformity:</b>	Workers not use appropriate PPE at workplace.		
<b>Requirement Reference:</b>	6.7.3 (C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.		
<b>Objective Evidence:</b>	During field visit at Block C89j Afdeling 3 Ukui Estate, auditor sighted two (2) FFB loader not use PPE during work.		
<b>Corrections:</b>	<ul style="list-style-type: none"> <li>- Conducting socialization to supervision, driver and loading regarding occupational health and safety at work place in particular the obligation of PPE usage. PT IIS – Ukui I POM and Estate has disseminate the occupational health and safety at work place including the disciplined of PPE usage at workplace on 10 – 15 February 2020. Evidence of socialization can be demonstrated during audit verification such as: attendant list, photo documentation.</li> <li>- Conducting socialization related to sanctions to employees and supervision regarding the use of PPE on 10 – 15 February 2020. Sanction to employee regarding the violation of OHS policy and regulation are described in the Memorandum of General manager (GM) No. 034/ES-KUK/Memo/02/2020 dated 11 February 2020. The sanction to employee that will be given include verbal reprimands, written warnings and warning letters which influence to workers performance appraisal.</li> </ul>		
<b>Root Cause Analysis:</b>	<ul style="list-style-type: none"> <li>- Lack of disciplined supervision on the use of PPE and there is no sanction mechanism given to supervision and employees who deliberately do not use PPE in the work area</li> </ul>		
<b>Corrective Actions:</b>	PT IIS – Ukui I POM and Estate has programmed the PPE usage checklist and inspection each day by supervision to ensure the disciplined on the use of appropriate PPE provided by		

	<p>company according to their job/workplace. Each supervision must completed the checklist and ensure all their workers using the appropriate PPE as per "Checklist Pemakaian Alat Pelindung Diri (APD)".</p> <p><b>NC Closure Visit 19 Feb 2020:</b></p> <p>Sample seen on monitoring of FFB loading workers PPE usage period January 2020. There were 5 workers of FFB loading in Ukui Estate. According to monitoring checklist can be demonstrated that all workers were using PPE accordingly. During field visit observe that the FFB loading workers using appropriate PPE: Helmet, Rubber safety shoes and handgloves. During interview with FFB loading workers confirmed that company has disseminated the OHS policy and the sanction if they don't use the appropriate PPE provided by company.</p>
<b>Assessment Conclusion:</b>	According to corrective action made and based on field verification during NCR Major visited on 19 February 2020, this NC is closed satisfactorily.

Non-conformity			
<b>NCR Ref #</b>	1861408-201911-N1	<b>Clause &amp; Category (Major / Minor)</b>	6.2.7
<b>Date Issued</b>	20 Dec 2019	<b>Due Date</b>	Next Surveillance
<b>Closed (Yes / No)</b>	No	<b>Date of nonconformity Closure</b>	Next Surveillance
<b>Statement of Nonconformity:</b>	Unit of Certification employed harvester as core work with non-permanent and full-time employment.		
<b>Requirement Reference:</b>	6.2.7 Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.		
<b>Objective Evidence:</b>	<p>Based on list of employee's data at Ukui Estate period November 2019, there is total 119 temporary workers (harvester and FFB loader) as core worker performed. Whereby, promotion program for temporary/casual workers cannot demonstrate by unit of certification.</p> <p>Based on interview with harvesting supervisor in Block D15e, Afdeling 2 Ukui Estate, it was informed that 10 temporary harvester are still employed and not promoted. However, promotion program for temporary/casual workers cannot demonstrate by unit of certification.</p>		
<b>Corrections:</b>	- Create a promotion program for harvest employees and cargo workers in 2020 - 2035		
<b>Root Cause Analysis:</b>	- The mechanism of promotion of harvest employees and loaders has not yet been finalized		
<b>Corrective Actions:</b>	- Ensuring that all core workers related to palm oil plantation are permanent workers. Monitoring the casual workers each month by KTU to ensure that they don't performed the core work and ensure that casual workers work more than 3 month are promote to be permanent workers according to labor regulation.		
<b>Assessment Conclusion:</b>	This NC will be verified in the next surveillance		

Opportunity for Improvements	
OFI #	Description
OFI 1	<b>1861408-201911-O1 Observation</b> Unit of Certification should consider accuracy of legal boundaries location are justified in the regularly monitoring.
OFI 2	<b>1861408-201911-O2 Observation</b> Content in management review consider to follow the guidance.
OFI 3	<b>1861408-201911-I1 Opportunity for Improvement</b> Considering re-delineated measurement of HCV area along the riparian at replanting area, to prevent double counting in planted area.

Positive Findings	
PF #	Description
PF 1	

### 3.4.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
<b>NCR Ref #</b>	1722079-201812-N1	<b>Clause &amp; Category (Major / Minor)</b>	Minor 2.1.3
<b>Date Issued</b>	17 December 2018	<b>Due Date</b>	Next Surveillance
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	16 December 2019
<b>Statement of Nonconformity:</b>	Lack of evidence that mechanism for ensuring compliance against law and regulations is well implemented.		
<b>Requirement Reference:</b>	2.1.3 A mechanism for ensuring compliance shall be implemented		
<b>Objective Evidence:</b>	<p>"Dokumen Evaluasi Kepatuhan Hukum" period January 2018 stated Comply with "UU no 13 Tahun 2003 Pasal 78 dan Kepmen no. 102 Tahun 2004 Pasal 3". However, during verification on sample of employees pay slip document and Letter of Assignment and Overtime within November 2018 found:</p> <ul style="list-style-type: none"> <li>• Ukui-1 Mill, employee name Paimin (FFB reception station), overtime duration is exceeds of maximum requirement per day (max. 3 hours). Document verified within 3-6 November 2018, where overtime calculated is 6 hours per day; on 9-10 November 2018 overtime calculated is 9 hours per day; on 24 November 2018 overtime calculated is 11 hour.</li> </ul>		

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	<ul style="list-style-type: none"> <li>Ukui-1 Mill, employee name Novli Arianto Sinaga (Effluent Pond operator), overtime calculated on 3 November 2018 is 6 hours; on 10 November 2018 is 6 hours; on 27 November 2018 is 8 hours.</li> </ul>
<b>Corrections:</b>	- Conduct a bipartite meeting to make a joint agreement regarding the ability of workers to overtime for more than 3 hours.
<b>Root Cause Analysis:</b>	- workers overtime at Mill over than 3 hours
<b>Corrective Actions:</b>	- Controlling worker overtime in accordance with the needs and abilities of workers.
<b>Assessment Conclusion:</b>	<p><b>16 December 2019</b></p> <p>Based on interview with sample of operator at Loading Ramp (FFB Receiving station) and processing operator, it is clearly informed that overtime calculation and record is already accurate.</p> <p>Verifying on payment slip document of Mr. S**** P***** (FFB receiving station) and Mr. O**** L***** (Tippler operator) period Sep-Nov 2019, calculation of overtime has been comply with manpower regulation.</p> <p>According to these evidence, this minor NC is Closed satisfactorily.</p>

Non-conformity			
<b>NCR Ref #</b>	1722079-201812-N2	<b>Clause &amp; Category (Major / Minor)</b>	Minor 2.2.2
<b>Date Issued</b>	17 December 2018	<b>Due Date</b>	Next Surveillance
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	16 December 2019
<b>Statement of Nonconformity:</b>	Location of BPN pegs is not accurate and appropriate with the maps and GPS coordinates is unverified.		
<b>Requirement Reference:</b>	2.2.2 Legal boundaries shall be clearly demarcated and visibly maintained.		
<b>Objective Evidence:</b>	<ol style="list-style-type: none"> <li>Map of "Peta Gambar Penyebaran Batu Batas PT Inti Indosawit Subur", Scale 1:60,000.</li> <li>Field check on sample of HGU boundaries peg BPN 11, Block B16H Afdeling 2 Ukui Estate, position of pegs is inappropriate with the map "Peta Gambar Penyebaran Batu Batas PT Inti Indosawit Subur, Skala 1:60,000".</li> </ol>		
<b>Corrections:</b>	- Remarketing the HGU BPN boundary pegs coordinates.		
<b>Root Cause Analysis:</b>	Convert the HGU coordinate points on the UTM3 BPN map into a Degree Minutes Second or Latitude Longitude.		

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<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>- Remarking the HGU BPN boundary pegs coordinates.</li> <li>- Perform monitoring of legal boundary pegs per semester.</li> </ul>
<b>Assessment Conclusion:</b>	<p><b>16 December 2019</b></p> <p>Based on ground check sample of boundary pegs, the GPS coordinates is available and accurate with the map. However, the justification on monitoring of legal boundaries are incomplete. Therefore, this aspect are consider as Observation on monitoring record in this assessment.</p> <p>This minor NC is Closed</p>

Non-conformity			
<b>NCR Ref #</b>	1722079-201812-N3	<b>Clause &amp; Category (Major / Minor)</b>	Minor 4.7.5
<b>Date Issued</b>	17 December 2018	<b>Due Date</b>	Next Surveillance
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	16 December 2019
<b>Statement of Nonconformity:</b>	Emergency equipment are not well maintain.		
<b>Requirement Reference:</b>	4.7.5 Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed.		
<b>Objective Evidence:</b>	Field observation at Ukui-1 POM: During drill and simulation on Hydrant at Power House Station, it is clearly that Nozzle and Hose is not appropriate, then it must be provided from other location (in example: Laboratory station) and also squirt of Hydrant is less pressure.		
<b>Corrections:</b>	<ul style="list-style-type: none"> <li>- Complete and adjust between the nozzle and the hydrant hose.</li> </ul>		
<b>Root Cause Analysis:</b>	Incompatibility of the hydrant hose connecting part (Nozzle and hose). The hydrant monitoring checklist has not run according to the schedule		
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>- Repair the diesel pump to increase the pressure of the hydrant pump</li> <li>- Monitor the checklist of hydrant emergency response equipment once a month</li> <li>- If it is found that the Hydrant is damaged and is not suitable for replacement.</li> </ul>		
<b>Assessment Conclusion:</b>	<p><b>16 December 2019</b></p> <p>Based on physically check to Hydrant at Power House Station and Storage at Ukui-1 POM, the condition of hose and nozzle of Hydrant is new and well condition.</p> <p>According to these evidence, this minor NC is closed satisfactorily.</p>		



Opportunity for Improvement	
OFI#	Description
<b>OFI 1</b>	<p><b>1722079-201812-I1</b></p> <p>Process on renewal of Land Use Title (HGU) certificate No. 01 Year 1989, expired on 31<sup>st</sup> December 2019 shall be monitored.</p> <p><b>16 December 2019:</b></p> <p>Renewal of HGU certificate is still in progress. Please refer to Indicator 2.1.1 in the summary report.</p>

### 3.4.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Major / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1412027M1	MAJOR	4.6.5	30-10-2016	Closed. 31-01-2017
1412027M2	MAJOR	4.6.6	30-10-2016	Closed. 31-01-2017
1412027N1	MINOR	4.7.6	30-10-2016	Closed. 15-12-2017
1569379-201712-M1	MAJOR	4.4.2	16-12-2017	Closed. 12-02-2018
1569379-201712-M2	MAJOR	4.7.2	16-12-2017	Closed. 12-02-2018
1569379-201712-M3	MAJOR	E.5.1	16-12-2017	Closed. 15-01-2018
1569379-201712-N1	MINOR	4.1.2	16-12-2017	Closed. 14-12-2018
1569379-201712-N2	MINOR	5.1.3	16-12-2017	Closed. 14-12-2018
1569379-201712-N3	MINOR	5.2.4	16-12-2017	Closed. 14-12-2018
1569379-201712-N4	MINOR	5.6.3	16-12-2017	Closed. 14-12-2018
1722079-201812-M1	MAJOR	4.1.4	17-12-2018	Closed. 12-02-2019
1722079-201812-M2	MAJOR	6.5.1	17-12-2018	Closed. 12-02-2019
1722079-201812-M3	MAJOR	3.2.ii) General CoC requirements for the supply chain.	17-12-2018	Closed. 12-02-2019
1722079-201812-M4	MAJOR	5.8.2 General CoC requirements for the supply chain.	17-12-2018	Closed. 12-02-2019
1722079-201812-M5	MAJOR	5.13.2 General CoC requirements for the supply chain.	17-12-2018	Closed. 12-02-2019
1722079-201812-M6	MAJOR	5.13.3 General CoC requirements for the supply chain.	17-12-2018	Closed. 12-02-2019



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1722079-201812-N1	MINOR	2.1.3	17-12-2018	Closed. 16-12-2019
1722079-201812-N2	MINOR	2.2.2	17-12-2018	Closed. 16-12-2019
1722079-201812-N3	MINOR	4.7.5	17-12-2018	Closed. 16-12-2019
1861408-201911-M1	MAJOR	5.6.1	20-12-2019	Closed. 19-02-2020
1861408-201911-M2	MAJOR	4.1.1	20-12-2019	Closed. 19-02-2020
1861408-201911-M3	MAJOR	4.2.1	20-12-2019	Closed. 19-02-2020
1861408-201911-M4	MAJOR	6.7.3	20-12-2019	Closed. 19-02-2020
1861408-201911-N1	MINOR	6.2.7	20-12-2019	Open. Verified in the next surveillance.

**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 **Ukui I POM – PT. Inti Indosawit Subur** 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.

<b>List of Stakeholders contacted</b>	
<p><b>Internal Stakeholders</b></p> <ul style="list-style-type: none"> <li>- Worker Union</li> </ul>	<p><b>Union/Contractors</b></p> <ul style="list-style-type: none"> <li>- Representative of Air Putih Villagers and Ukui II Villagers</li> <li>Previous Land Owner</li> </ul>
<p><b>Government Departments</b></p> <ul style="list-style-type: none"> <li>- Plantation and Forestry Agency, Pelalawan Regency.</li> <li>- National Land Agency of Pelalawan Regency</li> <li>- Manpower agency of Pelalawan Regency</li> <li>Environmental Agency of Pelalawan Regency</li> </ul>	<p><b>NGO</b></p> <ul style="list-style-type: none"> <li>- WWF Indonesia (by email, no respond)</li> <li>- Forest Watch Indonesia (by email, no respond)</li> <li>Sawit Watch Indonesia (by email, no respond)</li> </ul>

	<b>Stakeholders comment</b>
#1	<p><b>Feedbacks:</b>  <b>Dinas Perkebunan dan Kehutanan Kabupaten Pelalawan (Plantation and Forestry Agency of Pelalwan Regency)</b></p> <p>Cannot be visited in place because the Head of Office attended the meeting with Pelalawan Regent.</p>
	<p><b>Management Responses:</b> None</p>
	<p><b>Audit Team Findings:</b> None</p>
#2	<p><b>Badan Pertanahan Nasional Kabupaten Pelalawan (National Land Office of Pelalawan Regency)</b>            Interview is done by phone</p> <p>HGU certificate belongs to Ukui I, HGU No.01 issued by "Kantor Pertanahan Kabupaten Kampar" on 12/18/1989 based on "SK Kepala BPN No.04/HGU/1989" dated 04/27/1989 for 6,727.4 Ha as per "Surat ukur"/measurement minutes No.53/1988. HGU is valid until 12/31/2019.</p> <p>Process on renewal of Land Use Title (HGU) certificate No. 01 Year 1989, expired on 31<sup>st</sup> December 2019 shall be monitored.</p>
	<p><b>Management Responses:</b></p> <p>The HGU certificate has been extended based on decree of National Land Agency Head No. 156/SK/BPN/2004 November 11, 2004 an area of 6,726.255 Ha.</p> <p>Against SK HGU has been made registration to the BPN Regency extension of the pelalawan in accordance affidavits Land Registry No. 35/2019 on September 16, 2019 acres of 6.726,255 HA, so there was a reduction total area of an area of 1,385 HA.</p> <p>The reduction of extents HGU on the SKPT (Surat Keterangan Pendaftaran Tanah) caused by the release of some rights for the construction of high-voltage electricity network tower of 1,385 HA.</p> <p>The process further on the decree extension of hgu who have been registered is konstataasi or measurement over the land control of the re-that is currently being berporoses in the office region of Riau province.</p>
	<p><b>Audit Team Findings:</b></p> <p>Audit team will continue to monitor PT Inti Indosawit Subur - Ukui Group related to Process on renewal of Land Use Title (HGU) certificate.</p>
#3	<p><b>Feedbacks:</b>  <b>Dinas Tenaga Kerja Kabupaten Pelalawan (Manpower Agency of Pelalawan Regency).</b></p> <p>Cannot be found in place because the Head of Office attended the Provincial Disnaker meeting related to mediation of industrial relations dispute in Pekanbaru</p>
	<p><b>Management Responses:</b> None</p>
	<p><b>Audit Team Findings:</b> None</p>

#4

**Feedbacks:**

**Badan Lingkungan Hidup Kabupaten Pelalawan (Environment Agency of Pelalawan Regency)**  
Bpk. Demsi Surizal (Head of Environmental Protection Section)

- PT IIS (Ukui Group) consistently sends the Report of environmental management and monitoring every six (6) months, hazardous waste (LB3) management reports every 3 months and land application monitoring report every 3 months.
- During 2019, there were no report from public related to environmental pollution caused by operational of PT IIS (Ukui Group).

Plasma Ukui I and II:

- Training needs to be held related to training for environmental control and management particularly about hazardous waste handling in Plasma Ukui I and II.
- More effective communication can be established with the relevant agencies to better understand environmental management and hazardous waste
- Preparation of replanting should be prioritized, especially associated with sppl for the whole plasma farmers.
- On the dry season in order to do control and fires of land plantations and land communities surrounding plantations.

**Management Responses:**

- For the positive things that have been done will be maintained and improved by the management to be better in the future.
- Regarding the application of LB3 TPS in Ukui I and II plasma, the plasma will prepare human resources to be able to attend training related to hazardous waste handling.
- The preparation of the replanting are well prepared and up to now being is being progress.

Replanting program of Kebun Plasma Ukui has been established. Replanting program starts in year 2017 and will be done in 2028. Replanting program for all smallholders of Kebun Plasma Ukui are as follow:

Detail of replanting program per KUD:

No	SP	KUD	Ha	Year					
				2017	2018	2019	2020	2021	2022
1	1A	Sumber Makmur	1,562	-	-	-	438	230	322
2	2A	Bina Usaha Baru	616	472	-	100	44	-	-
3	3A	Bakti	448	-	-	224	224	-	-
4	3BC	Karya Bersama	864	-	-	250	348	266	-
5	4A	Sawit Subur	908	-	538	250	120	-	-
6	5A	Bina Sejahtera	1,236	-	-	-	-	262	356
7	6A	Sumber Bahagia	1,206	-	-	300	280	290	336
8	Ukui-II	Bukit Potalo	494	-	-	-	-	-	-
9	R.Seko	Usaha Baru	494	-	-	-	-	-	-
10	1B	Tani Subur	780	-	-	-	-	246	264
11	2B	Karya Tani	734	-	-	-	-	-	-
12	3B	Mekar Abadi	574	-	-	-	-	-	-
13	4B	Trani Maju	962	-	-	-	-	-	-
14	5B	Tani Bahagia	1,366	-	-	-	-	-	-
15	6B	Usaha Tani	1,292	-	-	-	-	-	-
Total			13,536	472	538	1,124	1,454	1,294	1,278

No	SP	KUD	Ha	Year					
				2023	2024	2025	2026	2027	2028
1	1A	Sumber Makmur	1,562	322	250	-	-	-	-
2	2A	Bina Usaha Baru	616	-	-	-	-	-	-
3	3A	Bakti	448	-	-	-	-	-	-

4	3BC	Karya Bersama	864	-	-	-	-	-	-
5	4A	Sawit Subur	908	-	-	-	-	-	-
6	5A	Bina Sejahtera	1,236	374	244	-	-	-	-
7	6A	Sumber Bahagia	1,206	-	-	-	-	-	-
8	Ukui-II	Bukit Potalo	494	-	-	-	-	-	494
9	R.Seko	Usaha Baru	494	-	-	-	-	-	494
10	1B	Tani Subur	780	270	-	-	-	-	-
11	2B	Karya Tani	734	-	254	126	178	176	-
12	3B	Mekar Abadi	574	-	-	-	220	354	-
13	4B	Trani Maju	962	-	390	268	304	-	-
14	5B	Tani Bahagia	1,366	-	-	334	228	426	378
15	6B	Usaha Tani	1,292	-	-	380	244	366	302
Total			13,536	966	1,138	1,108	1,174	1,322	1,668

- PT IIS has reported fire incident inside HGU area or around to Dinas Perkebunan Kabupaten Pelalawan. During period 2017 there was no fire incident inside or around HGU area of PT IIS.
- Noted that there is no land conflict reported between the company and the surrounding communities.

**Audit Team Findings:**

Audit team will continue to monitor PT Inti Indosawit Subur - Ukui Group related to environment management and monitoring performance. Especially associated with replanting program will be done verification every audit visit.

#5

**Feedbacks:**

**Perangkat Desa Desa Air Putih dan Ukui II (Local communities and villagers)**

Bpk. Seti Winarno (Head of Air Putih Village)

Bpk. Tarmizi (Head of Ukui II Village)

- Generally, the communication between the village government or local community and company has going well.
- The company has always responded to each problem or issue submitted by government officials from village and surrounding communities.
- The Company has realized a CSR program to the local community and involve them in the CSR program planning process in each village. However, need more intensive communication to make it harmonize with ADD program.
- Surrounding communities feels positive due to benefits from the presence of the company, for the maintenance of road infrastructure, public health, education and community economic development (trainings on productive enterprises).
- There was no report from the community working in the company related to forced labor practices by the company.
- Employees working at PT IIS (Ukui Group) have received the wages as determined by the government.
- Communities has understood the rules of the company prohibiting the acceptance of underage workers / child laborers.
- Maintenance transport access roads for transportation of FFB and CPO.

**Management Responses:**

The company has made a road maintenance program through CSR programs that are conducted twice a year. Maintenance of this road consists of the formation of roads, hardening using rock and road compacting.

	<p>Access road maintenance FFB and CPO carried out scheduled, every 4 months once done using heavy equipment (motor grader) good maintenance or hoarding the road and compacter. In the dry season done watering the road every day (in the morning and evening).</p> <p><b>Audit Team Findings:</b>          Audit team will continue to monitor PT Inti Indosawit Subur - Ukui Group related to manpower and communications and transparency information.</p>
<p><b>#6</b></p>	<p><b>Previous Land Owner</b>          Bpk. Atan K and H. Syarif in Desa Ukui II</p> <ul style="list-style-type: none"> <li>- There is no land disputes occurred within the plantation area for the last 3 years. The plantation was developed along with the scheme smallholder surrounding the plantation. There was no land compensation since area designation was clean and clear.</li> <li>- The process of land compensation is carried out by the company has been in accordance with the procedures and social approach methods. The process of indemnity through discussion with the rest of landlord, land owner representative (appointed by the community), the leaders of the community and the local government (head of the village) as well as witnesses</li> <li>- The last process of land compensation carried out was in 2017 related to the acquisition of land for the road for FFB and CPO transportation along 2 km which are in the area plasma Soga Estate.</li> </ul> <p><b>Management Responses:</b>          For the positive things that have been done will be be maintained and improved by the management to be better in the future.</p> <p><b>Audit Team Findings:</b>          Audit team will continue to monitor PT Inti Indosawit Subur - Ukui Group related to land land compensation and or land dispute.</p>
<p><b>#7</b></p>	<p><b>Feedbacks:</b>  <b>Workers Union</b>          Bpk. Zaenal Arifin Bangun (Chairman of the Workers Unions)</p> <ul style="list-style-type: none"> <li>- The Company has realized Normative Rights of employees such as remuneration in accordance with applicable regulations, Allowance/THR, BPJS Program.</li> <li>- Legally SPSI members is a labor consist of SKU labor and also staff however operationally SPSI also consider the problems that occur at the level of non permanent workers/PHL.</li> <li>- Non permanent workers has had a Labour Agreement (SPK) with the company.</li> <li>- Performance appraisals are conducted once a year as management considerations for evaluation, promotion and rotation.</li> <li>- There is no indication that the company conducted discrimination against its workers.</li> <li>- The company has provided Personal Protective Equipment (PPE) for all workers.</li> <li>- The company has providing facilities for employees adequately for example housing, water, electricity, toilets, Sanitation, School Bus, clinics, places of worship.</li> </ul>


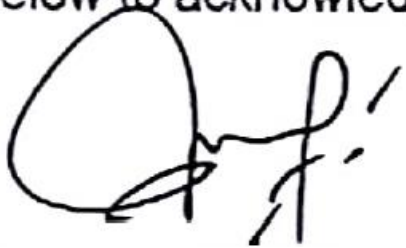
	<ul style="list-style-type: none"> <li>- The Company has registered all the workers in BPJS program (Employment and Health BPJS) including PHL (non-permanent employees).</li> <li>- There has never happened employees demonstration to the company management.</li> <li>- The Company has provided wages in accordance with existing regulations.</li> <li>- There is no indication of the company in violation of Human Rights.</li> <li>- There is no indication of forced or coercive labor practice of work.</li> <li>- "Lembaga kerjasama Bipartit (LKS Bipartit)"/Cooperation Institution has been established as a medium of communication between the company and employees.</li> </ul>
	<p><b>Management Responses:</b></p> <p>For the positive things that have been done will be maintained and improved by the management to be better in the future.</p>
	<p><b>Audit Team Findings:</b></p> <p>The company has maintained good management of occupational and social policy, all feedback from workers union are positive as well as previous assessment, audit team acknowledge the positive feedback.</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
Atan	> 20 years	2 Ha	Yes	Yes	Yes
H. Syarif	> 20 years	3.5 Ha	Yes	Yes	Yes

Previous land owner / user comment	
	<p><b>Feedbacks:</b></p> <ul style="list-style-type: none"> <li>- There is no land disputes occurred within the plantation area for the last 3 years. The plantation was developed along with the scheme smallholder surrounding the plantation. There was no land compensation since area designation was clean and clear.</li> <li>- The process of land compensation is carried out by the company has been in accordance with the procedures and social approach methods. The process of indemnity through discussion with the rest of landlord, land owner representative (appointed by the community), the leaders of the community and the local government (head of the village) as well as witnesses</li> <li>- The last process of land compensation carried out was in 2017 related to the acquisition of land for the road for FFB and CPO transportation along 2 km which are in the area plasma Soga Estate.</li> </ul>
	<p><b>Management Responses: -</b></p>
	<p><b>Audit Team Findings: Comply</b></p>

### 3.6 Impartiality and conflict of interest

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

<b>Formal Signing-off of Assessment Conclusion and Recommendation</b>	
<p>The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that <b>Ukui I POM – PT. Inti Indosawit Subur</b> has complied with the RSPO P&amp;C 2018 and RSPO Supply Chain Certification Standard 2017 Module E – CPO Mills: Mass Balance 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 <b>Ukui I POM – PT. Inti Indosawit Subur</b> is continued.</p>	
<b>Report prepared by</b>	<b>Acceptance of Assessment Conclusion</b>
<b>Name:</b> <b>Yudwi Wisnu Rahmanto</b>	<b>Name: Armstrong V.S</b>
<b>Company Name:</b> <b>On behalf of BSI Services Malaysia Sdn. Bhd.</b>	<b>Company Name: PT. Inti Indosawit Subur – Ukui I</b>
<b>Title:</b> <b>Lead Auditor</b>	<b>Title: Group Manager</b>
<b>Signature:</b> 	<b>Signature:</b> below to acknowledge 
<b>Date: 17 March 2020</b>	<b>Date: 17 March 2020</b>

**Appendix A: Summary of Findings**

Criterion / Indicator	Assessment Findings	Compliance	
<p><b>Principle 1: Behave ethically and transparently</b> Drive ethical business behaviour, build trust and transparency with stakeholders to ensure strong and healthy relationships.</p>			
<p><b>Criteria 1.1</b> The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.</p>			
<p>1.1.1</p>	<p><b>(C)</b> Management documents that are specified in the RSPO P&amp;C are made publicly available.</p>	<p>Company has a set of publicly available document in form of “Daftar Dokumen dan Informasi Untuk Diakses Publik PT Inti Indosawit Subur” dated 21 August 2017. The provision of publicly available document segregates based on stakeholder category: Government, community and NGO: AMDAL document, RKL/RPL report, Social Impact Assessment, HCV identification and monitoring report, land permit (Izin Lokasi – location permit, Izin Prinsip – principle permit, HGU/land title certificate), environmental permit, palm oil mill machinery permits and licenses, safety committee report, plantation business progress report, conservation management plan document, environmental management program, corporate social responsibility/CSR documents, FFB price, forest and land fire fighting report, ground water use report, tax and retribution payment documents, radio station permit, company policies, continuous improvement program, social procedures, hazardous waste handling report, POME land application permit and report, manpower report, employee’s medical check up result, physical and chemical analysis of river water, land compensation report, public summary report.</p> <p>A number of documents are determined to be available for public, with approval from management:</p> <ul style="list-style-type: none"> <li>• Report on the Implementation of the RKL-RPL every 6 months (environmental management and monitoring report);</li> </ul>	<p>Comply</p>



		<ul style="list-style-type: none"> <li>• Report on B3 waste balance every 3 months (hazardous waste balance report);</li> <li>• Reports of liquid and solid waste every 3 months (solid and liquid waste report);</li> <li>• Report on the use of surface and underground water every once a year (Underground and surface water usage report);</li> <li>• P2K3 report every 3 months period (health and safety report);</li> <li>• Mandatory Report</li> <li>• every year once a year (manpower report);</li> <li>• Plantation business progress report every 1 year period (plantation business progress report);</li> <li>• Reports on the results of high conservation value monitoring (high conservation value monitoring report);</li> <li>• Report on monitoring and preventing land fires every 6 months (land fire monitoring and prevention activity report);</li> <li>• Employee's medical checkup result;</li> <li>• Report on air emissions (air emission test report);</li> <li>• Report on river physical and chemical analysis (river water's physical and chemical test results);</li> </ul> <p><b>Ukui Smallholder:</b> The Smallholder Manager has determined type of documents which can be accessed by public, that covers:</p> <ul style="list-style-type: none"> <li>• Copies of Sertifikat Hak Milik (SHM) – and ownership certificate.</li> <li>• Group working Program</li> <li>• HCV</li> <li>• Standar Operational Procedure of Good Agriculture Practices.</li> <li>• Social Impact Assessment (SIA).</li> <li>• Social Activity Documents.</li> </ul>	
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		<ul style="list-style-type: none"> <li>Local Development Documents.</li> <li>Prices of Fresh Fruit Bunches</li> </ul>	
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders.	<p>Company has a set of publicly available document in form of "Daftar Dokumen dan Informasi Untuk Diakses Publik PT Inti Indosawit Subur" dated 21 August 2017. The provision of publicly available document segregates based on stakeholder category. PT IIS-UKUI 1 was provided an Information in appropriate language (Bahasa Indonesia) it can be understood and accessible by relevant stakeholders.</p> <p><b>Ukui Smallholder:</b></p> <p>Ukui smallholder set of publicly available document in form of "Daftar Dokumen yang Dapat Di Akses" updated on 2 January 2019. The list of information is provides on Indonesian language, so can be understood by all stakeholder.</p> <p>Based on interview with surroundings stakeholder (e.g head of village, community group and contractor of transport FFB can be understood of that list.</p>	Comply
1.1.3	<b>(C)</b> Records of requests for information and responses are maintained.	<p>The company has established procedure to handle stakeholder information request in "SOP Penanganan Permintaan Informasi Stakeholder" (SOP No. AA-GL-5008.1-RI, Rev. 1) dated 22 August 2011. The procedure described that information request can be receive by oral or written, or by representative of communities; the company will responded according to respective authorities, starts from Humas (public relation), Estate/Mill manager, Group Manager and Regional Office. The company has set time to respon information request, it is 14 working days.</p> <p>Record of information request and response/information logbook is maintained by company. Records of information are kept for minimum three (3) years. Below are seen and verified Sample:</p> <ul style="list-style-type: none"> <li>P2K3 Activities Report (Safety Committee report) Ukui I and II Palm Oil Mill Period July - September 2019 KSL and KSA, sent to Manpower Agency of Riau Province on 10 October 2019.</li> </ul>	Comply

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		<ul style="list-style-type: none"> <li>• Report on Environment Management and monitoring (UKL-UPL) Measuring Palm Oil Mill I, KSA and KSL period January - June 2019, sent to the Environment Agency of Pelalawan Regency. on 6 September 2019.</li> <li>• Report on the Implementation of Land Applications and Utilization of Solid Waste (Land Application report) Measure I and II Palm Oil Mill, KSA and KSL period January – March 2019, sent to the Environment Agency of Pelalawan Regency on 24 April 2019.</li> <li>• Report on the Implementation of Land Applications and Utilization of Solid Waste (Land Application report) Assess the Palm Oil Mill, KSA and KSL period from April - June 2019, sent to the Environment Agency of Riau Province on 12 July 2019.</li> <li>• Hazardous waste management report (Laporan LB3) period July - August 2018, sent to the Environment Agency of Pelalawan Regency on 14 August 2018.</li> <li>• Plantation Business Development Report period July – December 2018, sent to Plantation Agency of Pelalawan Regency on 25 January 2019.</li> <li>• PT IIS High Conservation Value Plant and Animal Monitoring Report Ukui I period January - June 2019 has been sent to BKDSA Provincy of Riau, dated 10 July 2019.</li> <li>• Request for information from Head of Bagan Limau Village on 24 January 2019 by letter no. 005/UM/BL/I/2019/147 related invitation for anniversary celebration of Pasar Sempurna and has responded on 25 January 2019.</li> <li>• Request for information from DLH (Pekanbaru Environmental Agency) on 17 October 2018 by letter no. UN.69/K.6/BIDTEK/B.3/KSA.1.2/02/2019 related invitation invitation to a joint commitment meeting to save the Sumatran Elephant in the Giam Siak Kecil Wildlife Sanctuary, Balai Raja Wildlife Reserve and the Surrounding Area of Tesso Nilo National Park, have been responded on 6 February 2019 by visit to the DLH Kab. Pelalawan office on 8 February 2019.</li> <li>• Request for information from Camat on 7 February 2019 regarding Musyawarah</li> </ul>	
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		<p>Rencana Pengembangan (MUSREMBANG) tingkat Kecamatan Ukui Tahun 2020 bey letter no. 005/UM/2019/33, has been responded on 7 February 2019.</p> <ul style="list-style-type: none"> <li>Request for information from Sekolah Dasar Permata Ukui Andalan at Desa Ukui on 22 April 2019 by lettere no. 186/SD-PUA/VI/2019 related the bus loan for inter-school children, was responded on 22 April 2019.</li> <li>Request for information from Bupati Pelalawan on 29 Oktober 2019 by letter no. 005/BPBD/2019 regarding Invitation from Pelalawan Regent in order to prevent and countermeasure Karhutla, has responded on 29 October 2019.</li> </ul> <p><b>Ukui Smallholder:</b></p> <p>All information request were documented in Logbook of "Catatan Permintaan Informasi dan Tanggapan". Up to November 2019, there were 25 information request, e.g.:</p> <ul style="list-style-type: none"> <li>Request for information from chairman of KUD Sumber Makmur on 30 July 2019 through letter no. 019/KUD-SM/VII/2019 related to requests for assistance copy map coordinates plasma SP1 farmers group, has responded on 30 July 2019</li> <li>Request for information from Chairman KUD Tani Subur on 4 April 2019 through letter no. 12/KUD.TS/IV/2019 related requests for assistance bus transport, has responded on 4 April 2019 by sending the bus to the KUD Tani Subur office.</li> </ul>	
1.1.4	<p><b>(C)</b> Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official.</p>	<p>Company has developed a communication procedure under "Mekanisme Penanganan Permintaan Informasi Stakeholder "(No. SOP; AA-GL-5008.1-R1) dated 22 August 2011. The procedure described that information request can be receive by oral or written, or by representative of communities; the company will responded according to respective authorities, starts from Humas (public relation), Estate/Mill manager, Group Manager and Regional Office. The company responses against all information request sent by stakeholders including response time of 14 working days after</p>	Comply

		<p>information request accepted. In addition, record related to information request and company response kept and maintained for three (3) years.</p> <p>Based on public stakeholder consultation with KUD/cooperative chairman, local contractor, NGO and public official, it was revealed that company has communicating in good manner. Company also provide response to information request in accordance to authority and the communication SOP.</p> <p><b>Ukui Smallholder:</b></p> <p>The Smallholder Manager has established mechanism for communication and consultation "Mekanisme Komunikasi dan Konsultasi" dated 16 January 2017, shaped flow Chart that describes the process of incoming information requests up to the responses provided. Responsible for the response of information from the stakeholders is done by the Field Assistant then will be arranged to the Estate Manager.</p> <p>Based on interview with sampled individual members, they have understood the rules for consultation and communication.</p> <p>Each smallholder member has "Buku Panduan dan Catatan Petani Plasma", whereas explains the flow process of consultation and communication. Both of communication by written or verbal communication to group management are acceptable.</p>	
1.1.5	There is a current list of contact and details of stakeholders and their nominated representatives.	<p>List of stakeholders updated in July 2019, there were 3 types of stakeholders i.e: government (agency office in Pelalawan Regency, Kapolsesk Ukui, Camat Ukui, head of village), Kebun Masyarakat (20 smallholders) and NGO (WWF, Scale Up). The stakeholder list completed with name of chairman, address and contact number. List of information that can be access by relevant stakeholders available in indicator 1.2.1</p> <p>The list of stakeholder list updated annually by Public Relation. Last update performed in 10 January 2019, consist of 35 stakeholders which related to company operation, as follows:</p>	Comply

		<ul style="list-style-type: none"> <li>- <u>Government institution</u>, consist of Surrounding villages, District Head, and related agency of Pelalawan Regency (Dinas Lingkungan Hidup, Dinas, Perkebunan, Dinas Tenaga Kerja, BPN).</li> <li>- <u>Chairman</u> of Koperasi Unit Desa (KUD) which under company scheme smallholder.</li> <li>- <u>Informal institution</u> around the company, e.g. FK-KPPS, GWKAK, Worker Union and WKAK.</li> <li>- <u>NGO around</u> the company i.e: WWF, Scale Up, etc. ‘</li> </ul> <p><b>Ukui Smallholder:</b></p> <p>The Smallholder Manager has consistently updated the list of stakeholders, the last update performed on 2 January 2019, where there are 56 stakeholder, e.g:</p> <ol style="list-style-type: none"> <li>1. Stakeholders from PT IIS (9 stakeholders)</li> <li>2. Stakeholders from local government (18 stakeholders)</li> <li>3. Stakeholders related agency in Pelalawan Regency (5 stakeholders)</li> <li>4. Stakeholder from banks (6 stakeholders)</li> <li>5. Stakeholder from KUD (18 stakeholders).</li> </ol>	
<p><b>Criteria 1.2</b>  The unit of certification commits to ethical conduct in all business operations and transactions.</p>			
1.2.1	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.	PT Inti Indosawit Subur has revised the company policy by including commitment to a code of ethical business conduct, it was signed by Managing Director on 1 December 2014. The policy has been disseminated to all employees by installing signboard of company policy and by direct dissemination, e.g.: <ol style="list-style-type: none"> <li>a. In 2019, dissemination has performed on 10 September 2019 attended by 32</li> </ol>	Comply

		<p>personnel from KSA Estate, on 10 April 2019 attended by 72 personnel at KSL. List of attendance was available at the time of audit.</p> <p>b. In 2018, dissemination has been performed on 13 October 2018 and attended by 68 personel from Ukui Estate (Afdeling 1 to 5).</p> <p>c. At PMKS Ukui I the company policy including of ethical business conduct has performed on 15 October 2018 and attended by 50 personel.</p> <p>d. In 2017, dissemination has been done on 19 October 2017, attended by 76 personnels from Ukui I Mill.</p> <p>e. In 2016, dissemination has been done on 25 May 2016, attended by 16 personnels from Ukui I Mill, Ukui II Mill, Ukui Estate and Soga Estate; on 5 September 2016, attended by 13 personnels from Division 3 Ukui Estate; on 16 April 2016, attended by 20 personnels of Ukui Estate spraying worker; on 23 May 2016, attended by 14 personnels from Division 3 Ukui Estate.</p> <p>f. In 2015, dissemination has been done on 21 February 2015, which held in Ukui I Mill, attended by 45 personnel; on 28 June 2015, held in Ukui I Estate, attended by 99 personnels.</p> <p>In the recruitment process policies have been applied related to business ethics, which are stipulated in the Work Agreement Letters both PHL, PKWT and in the Collective Labor Agreement (PKB).</p> <p>In the Daily worker Agreement and PKWT Work Agreement, it is also explained in relation to company policy stated in appendix 1, that is:</p> <p>Disgraceful Acts / Actions of Workers That Result in the Termination of the Work Agreement; "Committing and / or directly or indirectly involved in a fraud and / or theft and / or embezzlement of goods and / or money belonging to the company, embezzling company money, accepting gifts from other parties due to work results. <i>"Perbuatan/Tindakan Tercela Tenaga Kerja yang Mengakibatkan Berakhirnya Perjanjian Kerja; "Melakukan dan/atau terlibat langsung maupun tidak langsung dalam suatu penipuan dan/atau pencurian dan/atau penggelapan barang dan/atau</i></p>	
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		<p><i>uang milik perusahaan, Menggelapkan uang milik perusahaan, meneripa uang pemberian dari pihak lain karena hasil kerja".</i></p> <p>At the recruitment process has been applied policy related to business ethics and also set forth in the letter of the work agreement both PHL, PKWT and in PKB.</p> <p>In the daily freelance work agreement and the PKWT work agreement, it is also explained in relation to the company policy stated in Appendix 1; Occupational action/actions that resulted in the expiration of the employment agreement; "Doing and/or engaging directly or indirectly in a fraud and/or theft and/or embezzlement of the company's goods and/or money, darkening the company's money, terrorize the awarding of the other party due to work</p> <p>PKB period 2018-2020 has explained related to business ethics in article XXII about "Obligations of The Company and Employees"; including: employers and workers are obliged to maintain good character and do not contradict the legal norms and moral values, employers and workers are obliged to comply with and enforce all regulations and legislation on Applicable employment.</p> <p><b>Ukui Smallholder:</b></p> <p>The Smallholder Manager already has a Code of Ethical Business Policy that included on "Kebijakn Manajer Group ICS" signed on 16 January 2017, and has been disseminated to each member through the "Kegiatan Refresh Pelatihan ICS" was performed om 3 August 2019 attnded by 80 farmers where in point 2 stated "Committed to ethical conduct in business in overall transactions and business operations, prohibition all forms of corruption, bribery and fraud in the use of funds and resources".</p> <p>Document verification shows that all farmer members have stated approval of all policy issued by Smallholder Manager, including policy related to code of ethic which described in the Agreement Letter. Document seen: Member of KUD Sumber Bahagia and KUD Karya Bersama as many as 530 kavling (plot) have signed Cooperation</p>	
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		<p>Agreement for example; Jumar (KUD Sumber Bahagia, namely Sakri/Basri, KT: 125, No. Kav.: 2440), Maini/Wawan (KUD Mekar Jaya, KT: 125, No. Kav.: 2535), Undang R. (KUD Karya Bersama, KT: 01, No. Kav.: 845), Ahmad Taufik (KUD Karya Bersama, KT: 01, No. Kav: 844), the agreement signed on 16 January 2017 and valid until 2 December 2021.</p> <p>Based on interview with smallholders shows that they have a good understanding of the Code of Business Conduct policy issued by the Smallholder Manager.</p>	
<p>1.2.2</p>	<p>A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.</p>	<p>The Company - UKUI Group (including scheme smallholder) has implemented business conduct policy to seluruh employees, it is repeated an in employment contract with PKB employees period 2018-2020. Describes on article XXII about "Kewajiban Perusahaan dan Pekerja"; these included: <i>Pengusaha dan pekerja berkewajiban memelihara budi pekerti yang baik dan tidak bertentangan dengan norma hukum dan nilai susila, Pengusaha dan pekerja berkewajiban mematuhi dan menjalankan segala peraturan dan perundangan tentang ketenagakerjaan yang berlaku.</i></p> <p>At the recruitment process has been applied policy related to business ethics and also set in the letter of the work agreement both PHL, PKWT and in PKB.</p> <p>In the daily worker agreement and the PKWT work agreement, it is also explained in relation to the company policy stated in Appendix 1; Occupational action/actions that resulted in the expiration of the employment agreement; "Doing and/or engaging directly or indirectly in a fraud and/or theft and/or embezzlement of the company's goods and/or money, darkening the company's money, terrorize the awarding of the other party due to work</p> <p>Based on the interview with some employees and stakeholders, that they have understood linked to the the company's policy.</p>	<p>Comply</p>
<p><b>Principle 2: Operate legally and respect rights</b>          Implement legal requirements as the basic principles of operation in any jurisdiction.</p>			

<b>Criteria 2.1</b>																																	
There is compliance with all applicable local, national and ratified international laws and regulations.																																	
2.1.1	<b>(C)</b> The unit of certification complies with applicable legal requirements.	<p>Certification Unit of this scope are UKUI-I Mill supplied by UKUI Estate and 6 Smallholders Cooperatives. Legal requirements of land use rights in Indonesia is recognize as "Hak Guna Usaha" or Land Title. Where the Land Title issued by National Land Department. The legal land use-rights for this scope as follow:</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>Area (Ha)*</th> <th>Land Title</th> </tr> </thead> <tbody> <tr> <td>Ukui</td> <td>3,565</td> <td>SK Ka. BPN No: 156/HGU/BPN/2004, dated 11 November 2004.</td> </tr> <tr> <td>KUD Sumber Makmur</td> <td>1,562</td> <td>SHM</td> </tr> <tr> <td>KUD Bina Usaha Baru</td> <td>616</td> <td>SHM</td> </tr> <tr> <td>KUD Bakti</td> <td>448</td> <td>SHM</td> </tr> <tr> <td>KUD Karya Bersama</td> <td>864</td> <td>SHM</td> </tr> <tr> <td>KUD Sawit Subur</td> <td>908</td> <td>SHM</td> </tr> <tr> <td>KUD Bina Sejahtera</td> <td>1,236</td> <td>SHM</td> </tr> <tr> <td>KUD Sumber Bahagia</td> <td>1,206</td> <td>SHM</td> </tr> <tr> <td>KUD Bukit Potalo</td> <td>494</td> <td>SHM</td> </tr> </tbody> </table>	Estate	Area (Ha)*	Land Title	Ukui	3,565	SK Ka. BPN No: 156/HGU/BPN/2004, dated 11 November 2004.	KUD Sumber Makmur	1,562	SHM	KUD Bina Usaha Baru	616	SHM	KUD Bakti	448	SHM	KUD Karya Bersama	864	SHM	KUD Sawit Subur	908	SHM	KUD Bina Sejahtera	1,236	SHM	KUD Sumber Bahagia	1,206	SHM	KUD Bukit Potalo	494	SHM	Comply
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<b>TOTAL</b>	<b>11,393</b>							
<p>* based on Area Statement November 2019.</p> <p>Progress of extending HGU Certificate No. 00001/1989:</p> <p><b>March 27, 2019</b>            Research / Constellation Application, in the Context of Registration for Extension of HGU Period, Number: 203 / MB-RH2 / EXT.II / 2019, dated March 27, 2019.            The letter was delivered from PT. IIS to the Head of Regional Office of the Ministry of ATR / BPN Prov. Riau, related to the extension of HGU No. 00001 of 1989 (6,727.64 Ha).</p> <p><b>April 23, 2019</b>            Letter from PT. IIS to the Head of the Pelalawan Regency Land Office, concerning Application for Land Registration Certificate, Number: 022 / GL-RO2 / EXT / IV / 2019.</p> <p><b>September 16, 2019</b>            Certificate of Number: 35/2019, explains that:            A piece of land area of 6,726,255 Ha with NIB: 05.16.00.00.00007. Based on the Land Registration Document at the District Land Office. Pelalawan, the plot has been issued with a certificate with,            On behalf of: PT. Inti Indosawit Subur            Type and Right Number: Right to Cultivate: 00001            Area: 6,726,255 Ha.            Note: Based on the Decree of the Head of BPN No. 156 / HGU / BPN / 2004 dated 11-11-2004.</p>								

		<p>a. The right to cultivate has been extended for a period of 25 years from 31-12-2019 (HGU No.1 / Ukui), and registration for the extension of the HGU period can only be carried out within a period of 2 years before the termination of rights.</p> <p>b. This right to operate has been renewed for a period of 35 years since the end of the extension of the term for the right to use the land, that is, the registration for renewal can only be carried out within a period of 2 years before the extension of the term of the rights expires</p> <p>Reason reducing area is High Voltage Electricity Tower (SUTET).</p> <p><b>Please also refer to Indicator 4.4.1</b></p>	
2.1.2	A documented system for ensuring legal compliance is in place. This system has a means to track changes to the law and also includes listing and evidence of legal due diligence of all contracted third parties, recruitment agencies, service providers and labour contractors.	<p>"Evaluasi Kepatuhan Hukum, dated 28 May 2019".</p> <p>Documented system for ensuring legal compliance and to track changes of the law through procedure "SOP Pemenuhan Peraturan Perundang-undangan dan Perubahannya" AA-GL5001.1-R0 dated 5 December 2009.</p>	Comply
2.1.3	Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.	"Monitoring Pemeriksaan Patok Batas for SK HGU No: 78-HGU-BPN RI-2008" dated 20 June 2019. All legal boundary pegs are demarcated and visibly. During field observation, there is no planting beyond the legal boundaries.	Comply
<p><b>Criteria 2.2</b></p> <p>All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.</p>			
2.2.1	A list of contracted parties is maintained.	The Certification Unit already has a list of contracts and is well maintained in the format of "Monitoring the Making of Work Agreement, and Payment of BAP for the period February - November 2019, there are 9 FFB transport contractors; EFB transport, and others. The monitoring is carried out to monitor the type of work, the period of work, the progress of work and the status of BAP / contract payments. For examples:	Comply

		<ul style="list-style-type: none"> <li>• Palm Oil Empty Fruit Bunch (EFB) Transportation Working Agreement, no. 037/E2KUK/III/19 dated 1 April 2019 on behalf of Jani from Lubuk Kembang Sari Village, Implementation of the work calculated from the date 1/4/2019 up to 30/6/2019.</li> <li>• FFB acceptance agreement on behalf of Hamonangan Lumban Gaol dated 32 March 2018, as FFB supplier from Lubuk Batu Jaya Village.</li> <li>• FFB acceptance agreement on behalf of Samsuwar dated 20 May 2018, as FFB supplier from Lubuk Batu Tinggal Village.</li> <li>• FFB acceptance agreement on behalf of Gunawan Supriyanto dated 29 December 2018, as FFB supplier Sei Beras-beras Village.</li> <li>• Palm Oil Empty Fruit Bunch (EFB) Transportation Working Agreement, no. 009/E2KUK/I/19, dated 1 January 2019 namely Suminah di Desa Bagan Limau.</li> <li>• Tenancy agreement heavy equipment No. 021/E2KUK/01/19, dated 2 January 2019 namely PT Teknik Jaya Abadi di Pekanbaru.</li> </ul> <p><b>Smallholder – Ukui 1:</b></p> <p>Plasma Ukui 2 has already have and monitor against a contract with other parties, including:</p> <p>Fleet Agreement between "Koperasi Unit Desa Usaha Baru", Redang Seko Village and "Pengusah Angkutan TBS Kelapa Sawit" No. 03 / Spk / KUD-UB / TBS / XII / 2019, dated January 4, 2019 on behalf of Mardi (Redang Seko Village) 1 unit of truck with the vehicle number BM 9410 BU, explained related to the legal requirements in article 6; Others: fleet owners are obliged: not to use child labor (&lt;18 years), do not discriminate, provide opportunities and treatment at work and do not commit acts of violence and harassment of fellow co-workers ". within the agreement, related Article is describing meeting of legal requirements, as below:</p>	
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		<p>Article 7; Obligations: the fleet owner is obliged to obey the rules and complete the vehicle documents, must wear personal protective equipment when working in the field or when sending FFB to the Mill.</p> <p>Article 8; Prohibition: fleet owners are prohibited from committing fraud, theft and embezzlement of FFB, are prohibited from sexually harassing colleagues and prohibited from attacking, abusing funds or intimidating coworkers.</p>	
<p>2.2.2</p>	<p>All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.</p>	<p>PT IIS-UKUI Group has a list of contracts and is well preserved in the format " Monitoring Pembuatan SPK dan Pembayaran BAP periode February – October 2019", there are 9 TBS transport contractors and a vacant EFB. Monitoring is monitored for job type, job period, job progress as well as the status of BAP/payment of contracts.</p> <p>Related to the legal requirements in effect, described in the article 9; responsibility points (I): "guarantee that the second-party (PT IIS) about the existence of permission over all the equipment (facilities and infrastructure) in accordance with the rules and legislation that apply.</p> <p>In the work agreement described, that the company's policy (on the company's policy attachments that must be followed) related: Compliance with persyaratan rules and legislation, discrimination, Not employ under the age of 18 years and business code of conduct.</p> <p>For the carriage of TBS pt IIS-ukui 1 is not menggunakan contractors from the outside, but uses a unit on its own.</p> <p>Some contractors in ukui 1 group, among others:</p> <ul style="list-style-type: none"> <li>• Palm Oil Empty Fruit Bunch (EFB) Transportation Working Agreement, no. 037/E2KUK/III/19 dated 1 April 2019 on behalf of Jani from Lubuk Kembang Sari Village, Implementation of the work calculated from the date 1/4/2019 up to 30/6/2019.</li> </ul>	<p>Comply</p>

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2.2.3	<p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.</p>	<p>PT IIS-UKUI Group has a list of contracts and is well preserved in the format "Monitoring Pembuatan SPK dan Pembayaran BAP periode February – October 2019", there are 9 TBS transport contractors and a vacant EFB. Monitoring is monitore for job type, job period, job progress as well as the status of BAP/payment of contracts.</p> <p>Related to the legal requirements in effect, described in the article 9; responsibility points (I): "assure the second-party (PT. IIS) about the existence of permission over all the equipment (facilities and infrastructure) in accordance with the rules and legislation that apply.</p> <p>In the work agreement described, that the company's policy (on the company's policy attachments that must be followed) related: Compliance with requirements, rules and</p>	Comply



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**Criteria 2.3**  
All FFB supplies from outside the unit of certification are from legal sources.

2.3.1	<p><b>(C)</b> For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> <li>Information on geo-location of FFB origins</li> <li>Proof of the ownership status or the right/claim to the land by the grower/smallholder</li> <li>Where applicable, valid planting/operating/trading license, or is part of a cooperative which allows the buying and selling of FFB</li> </ul>	<p>Geo-location of FFB supplier:</p> <p>Scheme Smallholder:</p> <table border="1"> <thead> <tr> <th>SP</th> <th>DESA</th> <th>KECAMATAN</th> <th>KABUPATEN</th> <th>KUD</th> <th colspan="2">TITIK KOORDINAT</th> </tr> <tr> <th></th> <th></th> <th></th> <th></th> <th></th> <th>SOUTH</th> <th>EAST</th> </tr> </thead> <tbody> <tr> <td>Kantor Plasma</td> <td>Bagan Limau</td> <td>Ukui</td> <td>Pelalawan</td> <td></td> <td>00° 14' 22.0"</td> <td>102° 05' 38.7"</td> </tr> <tr> <td>1A</td> <td>Bukit Gajah</td> <td>Ukui</td> <td>Pelalawan</td> <td>Sumber Makmur</td> <td>00° 09' 04.5"</td> <td>102° 09' 26.1"</td> </tr> <tr> <td>2A</td> <td>Bukit Jaya</td> <td>Ukui</td> <td>Pelalawan</td> <td>Bina Usaha Baru</td> <td>00° 09' 35.5"</td> <td>102° 06' 22.5"</td> </tr> <tr> <td>3A</td> <td>Trimulya Jaya</td> <td>Ukui</td> <td>Pelalawan</td> <td>Bakti</td> <td>00° 08' 24.5"</td> <td>102° 05' 48.2"</td> </tr> <tr> <td>3BC</td> <td>Air Emas</td> <td>Ukui</td> <td>Pelalawan</td> <td>Karya Bersama</td> <td>00° 07' 00.0"</td> <td>102° 05' 54.6"</td> </tr> <tr> <td>4A</td> <td>Kampung Baru</td> <td>Ukui</td> <td>Pelalawan</td> <td>Sawit Subur</td> <td>00° 09' 41.1"</td> <td>102° 03' 28.6"</td> </tr> <tr> <td>5A</td> <td>Lubuk Kembang Sari</td> <td>Ukui</td> <td>Pelalawan</td> <td>Bina Sejahtera</td> <td>00° 12' 06.7"</td> <td>102° 06' 17.5"</td> </tr> <tr> <td>6A</td> <td>Silikuan Hulu</td> <td>Ukui</td> <td>Pelalawan</td> <td>Sumber Bahagia</td> <td>00° 13' 55.8"</td> <td>102° 06' 30.6"</td> </tr> <tr> <td>UKUI II</td> <td>Ukui II</td> <td>Ukui</td> <td>Pelalawan</td> <td>Bukit Potalo</td> <td>00° 08' 40.6"</td> <td>102° 10' 09.0"</td> </tr> <tr> <td>R. SEKO</td> <td>R. seko</td> <td>Lirik</td> <td>Inhu</td> <td>Usaha Baru</td> <td>00° 10' 56.9"</td> <td>102° 13' 12.5"</td> </tr> </tbody> </table> <p>Independent FFB Supplier:</p> <table border="1"> <thead> <tr> <th>Supplier</th> <th>Farmer</th> <th>Latitude</th> <th>Longitude</th> </tr> </thead> <tbody> <tr> <td><b>Non CSV:</b></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td>A. Kodir</td> <td>00°09'22.32" S</td> <td>102°03'11.11" E</td> </tr> </tbody> </table>	SP	DESA	KECAMATAN	KABUPATEN	KUD	TITIK KOORDINAT							SOUTH	EAST	Kantor Plasma	Bagan Limau	Ukui	Pelalawan		00° 14' 22.0"	102° 05' 38.7"	1A	Bukit Gajah	Ukui	Pelalawan	Sumber Makmur	00° 09' 04.5"	102° 09' 26.1"	2A	Bukit Jaya	Ukui	Pelalawan	Bina Usaha Baru	00° 09' 35.5"	102° 06' 22.5"	3A	Trimulya Jaya	Ukui	Pelalawan	Bakti	00° 08' 24.5"	102° 05' 48.2"	3BC	Air Emas	Ukui	Pelalawan	Karya Bersama	00° 07' 00.0"	102° 05' 54.6"	4A	Kampung Baru	Ukui	Pelalawan	Sawit Subur	00° 09' 41.1"	102° 03' 28.6"	5A	Lubuk Kembang Sari	Ukui	Pelalawan	Bina Sejahtera	00° 12' 06.7"	102° 06' 17.5"	6A	Silikuan Hulu	Ukui	Pelalawan	Sumber Bahagia	00° 13' 55.8"	102° 06' 30.6"	UKUI II	Ukui II	Ukui	Pelalawan	Bukit Potalo	00° 08' 40.6"	102° 10' 09.0"	R. SEKO	R. seko	Lirik	Inhu	Usaha Baru	00° 10' 56.9"	102° 13' 12.5"	Supplier	Farmer	Latitude	Longitude	<b>Non CSV:</b>					A. Kodir	00°09'22.32" S	102°03'11.11" E	Comply
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**RSP0 Public Summary Report**  
**Revision 9 (Nov 2019)**

			KT Pekarangan Kampung Baru	AAA	00°08'44.49" S	102°03'27.97" E
				AAT	00°10'00.80" S	102°03'47.73" E
				Abas	00°09'43.93" S	102°03'36.77" E
				Abas M.	00°10'07.50" S	102°03'19.61" E
				Abdul A.	00°09'33.86" S	102°03'37.93" E
				Abdul Kholik	00°10'00.79" S	102°03'30.90" E
				Abdul Senen	00°10'00.77" S	102°03'22.83" E
				Adi	00°09'38.02" S	102°03'17.84" E
				Adi	00°09'51.94" S	102°03'11.28" E
			Gunawan Supriyatno	Gunawan S.	00°23'14.80" S	102°04'58.70" E
			KT Bina Mandiri Bersama	Faisal	00°11'30.17" S	102°06'12.88" E
				Rusmono	00°11'30.12" S	102°06'12.60" E
				Suharjo	00°11'30.00" S	102°06'09.46" E
				Jalal	00°11'30.19" S	102°06'08.63" E
				Sanasri	00°11'30.19" S	102°06'07.91" E
				Muhidin	00°11'30.16" S	102°06'06.85" E
				Selamat	00°11'30.25" S	102°06'06.26" E
			Besty Siahhan Ella	Widodo	00°13'27.02" S	102°06'11.93" E
				M. Yusuf	00°13'27.36" S	102°06'11.59" E
				Rahmad	00°13'31.07" S	102°06'13.36" E
				Jamaan	00°13'29.05" S	102°06'11.71" E
				Darkim	00°13'28.96" S	102°06'12.00" E
				Kusmadi	00°13'30.38" S	102°06'11.76" E

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

				Tukijo	00°13'31.94" S	102°06'14.06" E		
				Ibin	00°13'33.73" S	102°06'13.80" E		
				Matkuri	00°13'34.03" S	102°06'13.56" E		
				Hartoloso	00°13'35.37" S	102°06'13.88" E		
				<b>CSV:</b>				
				Samsuwar	Samsuwar	00°23'15.11" S	102°05'2.35" E	
				Haluga	Haluga	00°16'30.0" S	102°06'00.0" E	
				Sutarno Kudin	Toro	00°19'57.30" S	102°06'10.41" E	
					Toro	00°17'49.76" S	102°06'00.18" E	
					Carles	00°17'53.97" S	102°05'57.96" E	
					Lasirin	00°17'49.74" S	102°05'54.50" E	
					Samino	00°18'01.54" S	102°05'49.79" E	
					Lasirin	00°18'04.69" S	102°05'49.95" E	
					Inen	00°17'52.71" S	102°05'36.98" E	
					Inen	00°17'52.46" S	102°05'36.98" E	
					Sarono	00°17'52.77" S	102°05'31.62" E	
					Toro	00°17'53.02" S	102°05'31.66" E	
					Kasam	00°17'52.92" S	102°05'22.64" E	
					Junaidi/Lasirin	00°17'52.83" S	102°05'17.59" E	
					Lasirin	00°17'52.20" S	102°05'13.70" E	
					Busroh	00°17'54.66" S	102°05'13.89" E	
					Pajar	00°17'55.91" S	102°05'13.91" E	
				Karni	00°18'04.11" S	102°05'25.27" E		

**RSP0 Public Summary Report**  
**Revision 9 (Nov 2019)**

				Lubis	00°18'05.11" S	102°05'25.14" E		
				Lubis	00°18'07.17" S	102°05'24.95" E		
				Julianto	00°18'09.01" S	102°05'24.53" E		
				Saragih	00°18'10.06" S	102°05'24.91" E		
				Sujud	00°18'11.63" S	102°05'24.21" E		
				Tofik	00°18'13.47" S	102°05'23.52" E		
				Sukur	00°18'16.63" S	102°05'23.18" E		
				Harjo	00°18'16.63" S	102°05'22.47" E		
				Lasirin	00°17'30.39" S	102°06'10.29" E		
				Amir	00°17'21.27" S	102°06'10.26" E		
				Lasirin	00°17'21.27" S	102°06'10.07" E		
				Amir	00°17'16.22" S	102°06'10.20" E		
				Basar	00°17'12.45" S	102°06'09.76" E		
				Daut	00°17'11.52" S	102°06'10.06" E		
				Basar	00°17'03.50" S	102°06'10.28" E		
				Daut	00°17'03.46" S	102°06'10.16" E		
				Basar	00°17'01.59" S	102°06'09.98" E		
				Daut	00°17'01.64" S	102°06'10.15" E		
				Daut	00°17'00.69" S	102°06'10.10" E		
				Ginting	00°17'58.98" S	102°06'10.17" E		
				Daut	00°16'57.72" S	102°06'10.09" E		
				Darma	00°17'28.92" S	102°06'00.70" E		
				Leo	00°17'29.08" S	102°06'00.02" E		
				Leo	00°17'29.23" S	102°05'58.13" E		

**RSP0 Public Summary Report**  
**Revision 9 (Nov 2019)**

			Darma	00°17'28.91" S	102°05'58.13" E		
			Bangun	00°17'28.31" S	102°05'41.93" E		
			Darma	00°17'29.43" S	102°05'40.80" E		
			Pardi	00°17'29.23" S	102°05'39.74" E		
			Darma	00°17'29.42" S	102°05'35.81" E		
			Uwar	00°17'29.42" S	102°05'33.89" E		
			Uwar	00°17'29.29" S	102°05'33.76" E		
			Herman	00°17'38.28" S	102°05'34.48" E		
			Joko	00°17'38.26" S	102°05'34.68" E		
			Ateng	00°17'40.52" S	102°05'35.05" E		
			Ateng	00°17'40.48" S	102°05'38.57" E		
			Kardio	00°17'40.65" S	102°05'42.87" E		
			Heru	00°17'40.59" S	102°05'44.96" E		
			Heru	00°17'40.68" S	102°05'44.83" E		
			Sisur	00°17'40.53" S	102°05'49.40" E		
			H. Wawan	00°17'40.72" S	102°05'34.66" E		
			Lasirin	00°17'44.66" S	102°05'35.30" E		
			H. Wawan	00°17'48.62" S	102°05'35.52" E		
			Lasirin	00°17'49.62" S	102°05'35.81" E		
			H. Wawan	00°17'51.64" S	102°05'35.77" E		
			Mardhika	00°16'39.70" S	102°05'38.40" E		
			Gilang	00°16'53.40" S	102°05'30.30" E		

		<p>Proof of ownership:          All smallholders member have land ownership rights. See details in 4.4.1</p> <p>Trading license:</p> <ul style="list-style-type: none"> <li>- "Surat Izin Usaha Perdagangan Kecil" of KUD Sumber Bahagia, No.137/BPMP2T/SIUP-K/2016/246 dated 24 Oct 2016, issued by "Badan Penanaman Modal dan Pelayanan Perizinan Terpadu" of Pelalawan Regency; valid until 24 Oct 2021.</li> <li>- "Tanda Daftar Perusahaan" KUD Sumber Bahagia No.041626465015 dated 24 Oct 2016; valid until 24 Oct 2021.</li> <li>- "Surat Izin Usaha Perdagangan Kecil" of KUD Usaha Baru, No.270/DPMP2T/SIUP-MK/VIII/2018 dated 8 Aug 2018, issued by "Badan Penanaman Modal Daerah dan Pelayanan Perizinan Terpadu" of Indragiri Hulu Regency; valid until 8 Oct 2023.</li> <li>- "Tanda Daftar Perusahaan Koperasi" KUD Usaha Baru No.040624600022 dated 8 Aug 2018; valid until 8 Oct 2023.</li> <li>- "Surat Izin Usaha Perdagangan Menengah" of KUD Karya Bersama, No.137/DPMP2T/SIUP-M/2017/27 dated 17 Mar 2017, issued by "Dinas Pelayanan Terpadu Satu Pintu" of Pelalawan Regency; valid until 17 Mar 2022.</li> <li>- "Tanda Daftar Perusahaan Koperasi" KUD Karya Bersama No.041624747012 dated 17 Mar 2017; valid until 17 Mar 2022.</li> </ul>	
2.3.2	<p>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>	<p>PT Inti Indosawit Subur – Ukui I POM receive and process FFB from outside supplier, some are collectors. List of agent are as follow:</p> <p>CSV (Create Share Value) are independent smallholder which coached by the company:</p> <ul style="list-style-type: none"> <li>- Asosiasi Petani Sawit Swadaya Amanah</li> <li>- Asosiasi Petani Sawit Swadaya Anugrah</li> <li>- Sutarno Kudin (SK)</li> <li>- Haluga (HL)</li> <li>- Samsuwar (SM)</li> <li>- Budi (BD)</li> <li>- Suhono (SN)</li> </ul>	Comply



		<p>Non CSV:</p> <ul style="list-style-type: none"> <li>- KT Pekarangan Kampung Baru</li> <li>- KT Bina Mandiri Bersama</li> <li>- Budianto (BDNT)</li> <li>- Gunaji (GJ)</li> <li>- Gunawan Suprayitno (GS)</li> <li>- Toni Bisono (TB)</li> <li>- Satumar (STM)</li> <li>- Moh Misnan (MM)</li> <li>- Parji</li> <li>- Salijan</li> </ul> <p>Geo Location: Koordinat petani penyuply</p> <p>Please see detail in 2.3.1</p> <p>Each agent have documented statement letter "Pernyataan dan Jaminan", the statement letter described:</p> <ol style="list-style-type: none"> <li>1. Agent are ready to follow requirements related FFB supplies which determined written or verbal by PT Inti Indosawit Subur.</li> <li>2. FFB supplied to PT Inti Indosawit Subur are coming from area which have been owned/control/cultivated according to the law and regulation related to land ownership, plantation and others.</li> <li>3. FFB supplied to PT Inti Indosawit Subur are not coming from land owned/control/cultivated in but not limited to:             <ol style="list-style-type: none"> <li>a. Protected forest;</li> <li>b. Industrial forest;</li> <li>c. Production forest, including Hutan Produksi Tetap (HP), Hutan Produksi Terbatas (HPT), Hutan Produksi Konversi (HPK), HPK can be excluded if forest release permit or STD-B (Surat Tanda Daftar Budidaya) demonstrated.</li> <li>d. Conservation area.</li> </ol> </li> </ol>	
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		<ol style="list-style-type: none"> <li>4. FFB supplied are not coming from PT Inti Indosawit Subur's Scheme Smallholders.</li> <li>5. FFB supplied are not coming from PT Inti Indosawit Subur's or other company's sortation.</li> <li>6. FFB supplied are not stolen.</li> <li>7. FFB supplied are not obtained by illegal activity.</li> <li>8. FFB supplied are not coming from new planting from forest area after Sep 2014.</li> <li>9. FFB supplied are not coming from new planting peat area after Sep 2014.</li> <li>10. FFB supplied are not coming from land conflict area.</li> <li>11. Zero burning for land clearing and replanting.</li> <li>12. Not employing children under 18 years old, as regulated in Act No.13/2003 regarding manpower.</li> <li>13. Pay employee according to minimum wage determined by government (UMK or UMP). Each agent representatives sign the statement letter, e.g. Karyono on 26 Aug 2015; Gunawan Supriyatno on 29 Dec 2014; Moh Misnan on 29 Dec 2014; KT Bina Mandiri Bersama on 26 Nov 2019; Sutarno Kudin on 31 Jul 2015; Samsuwar on 20 May 2015; Haluga (Halomoan Lumban Gaol) on 31 Mar 2015.</li> </ol> <p>The company has communicated Code of Procurement Ethics (CPOE), e.g. to KT Bina Mandiri Bersama on 26 Nov 2019. COPE are consist of: Business integrity; fair competition; open communication; conflict of interest; gift and entertainment; compliance to the international trade conventions and policies; mutual principle; declaration of the relationship with RGE Group; compliance to the sustainability framework. COPE provided with channel to report if there is violation to the principles and objectives, through email <a href="mailto:whistleblow@rgei.com">whistleblow@rgei.com</a> or phone (62) 81 2755 2528.</p>	
<p><b>PROCEDURAL NOTE:</b>          For Implementation Procedure for 2.3.2 refer to Annex 4.</p>			
<p><b>Principle 3: Optimise productivity, efficiency, positive impact and resilience</b>          Implement plans, procedures and systems for continuous improvement.</p>			
<p><b>Criteria 3.1</b>          There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.</p>			

3.1.1	<p><b>(C)</b> A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</p>	<p>A business management plan for long term economic feasibility has been documented by the Certificate Holder. The business management plan has include projection of production, quality planting material, mill extraction rates (OER and KER), upkeep cost, harvesting cost, transport cost, forecast price and capital expenditure.</p> <p>Projection of Production of Ukui I POM are as follow:</p> <table border="1" data-bbox="898 531 1742 887"> <thead> <tr> <th rowspan="2">Description</th> <th colspan="6">Target Year</th> </tr> <tr> <th>2019</th> <th>2020</th> <th>2021</th> <th>2022</th> <th>2023</th> <th>2024</th> </tr> </thead> <tbody> <tr> <td rowspan="4">FFB</td> <td>Ukui Estate</td> <td>57,255.36</td> <td>65,713.09</td> <td>63,741.70</td> <td>62,466.86</td> <td>59,968.19</td> <td>58,169.14</td> </tr> <tr> <td>Ukui Plasma</td> <td>146,648.97</td> <td>144,515.45</td> <td>141,625.14</td> <td>134,543.88</td> <td>121,089.49</td> <td>108,980.55</td> </tr> <tr> <td>Outside FFB</td> <td>140,419.98</td> <td>138,496.00</td> <td>135,726.08</td> <td>128,939.78</td> <td>116,045.80</td> <td>104,441.22</td> </tr> <tr> <td>Total FFB</td> <td>344,324.31</td> <td>348,724.54</td> <td>341,092.92</td> <td>325,950.52</td> <td>297,103.48</td> <td>271,590.91</td> </tr> <tr> <td></td> <td>CPO</td> <td>68,567.59</td> <td>68,627.66</td> <td>68,048.04</td> <td>65,124.91</td> <td>59,450.41</td> <td>54,426.82</td> </tr> <tr> <td></td> <td>PK</td> <td>18,765.67</td> <td>18,489.00</td> <td>18,009.71</td> <td>17,275.38</td> <td>15,597.93</td> <td>14,312.84</td> </tr> <tr> <td></td> <td>OER</td> <td>19.91</td> <td>19.68</td> <td>19.95</td> <td>19.98</td> <td>20.01</td> <td>20.04</td> </tr> <tr> <td></td> <td>KER</td> <td>5.45</td> <td>5.30</td> <td>5.28</td> <td>5.30</td> <td>5.25</td> <td>5.27</td> </tr> <tr> <td></td> <td>Rp/Ton CPO</td> <td>221.00</td> <td>217.00</td> <td>267.00</td> <td>266.00</td> <td>264.00</td> <td>263.00</td> </tr> <tr> <td></td> <td>Rp/Ton TBS</td> <td>43.82</td> <td>54.22</td> <td>53.30</td> <td>53.05</td> <td>52.88</td> <td>52.75</td> </tr> </tbody> </table>	Description	Target Year						2019	2020	2021	2022	2023	2024	FFB	Ukui Estate	57,255.36	65,713.09	63,741.70	62,466.86	59,968.19	58,169.14	Ukui Plasma	146,648.97	144,515.45	141,625.14	134,543.88	121,089.49	108,980.55	Outside FFB	140,419.98	138,496.00	135,726.08	128,939.78	116,045.80	104,441.22	Total FFB	344,324.31	348,724.54	341,092.92	325,950.52	297,103.48	271,590.91		CPO	68,567.59	68,627.66	68,048.04	65,124.91	59,450.41	54,426.82		PK	18,765.67	18,489.00	18,009.71	17,275.38	15,597.93	14,312.84		OER	19.91	19.68	19.95	19.98	20.01	20.04		KER	5.45	5.30	5.28	5.30	5.25	5.27		Rp/Ton CPO	221.00	217.00	267.00	266.00	264.00	263.00		Rp/Ton TBS	43.82	54.22	53.30	53.05	52.88	52.75	Comply
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3.1.2	<p>An annual replanting programme projected for a minimum of five years with yearly review, is available.</p>	<p>Ukui Estate was able to demonstrated annual replanting program. Replanting Program Ukui Estate:</p> <table border="1" data-bbox="898 1007 1312 1378"> <thead> <tr> <th>Year</th> <th>Program</th> <th>Actual</th> </tr> </thead> <tbody> <tr> <td>2015</td> <td>307</td> <td>307</td> </tr> <tr> <td>2016</td> <td>371</td> <td>371</td> </tr> <tr> <td>2017</td> <td>542</td> <td>542</td> </tr> <tr> <td>2018</td> <td>455</td> <td>455</td> </tr> <tr> <td>2019</td> <td>-</td> <td>-</td> </tr> <tr> <td>2020</td> <td>-</td> <td>-</td> </tr> <tr> <td>2021</td> <td>405</td> <td>-</td> </tr> </tbody> </table>	Year	Program	Actual	2015	307	307	2016	371	371	2017	542	542	2018	455	455	2019	-	-	2020	-	-	2021	405	-	Comply																																																																		
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2022	646	-							
2023	649	-							
		<p>Replanting program has been performed since 2015 and continues until 2018. Annual review of replanting conducted during management meeting. Last review in 2018 resulting replanting postponed in 2019 and 2020. During 2019 there is postpone of replanting do to the average yield is still over 20 ton/Ha/year. The postpone continue until 2020. The next replanting activity will be conducted in 2021.</p>							
3.1.3	The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.	<p>Management review of Ukui Estate and Ukui I POM conducted on 11 Jun 2019, attended by Estate Manager, Field Assistant, KTU and Sustainability Assistant. The management review has discussed:</p> <ul style="list-style-type: none"> <li>- Result of internal audit that conducted on 15-17 May 2019; e.g. Governor regulation that has not been evaluated.</li> <li>- Customer feedback: management of Ukui Estate in coordination with SSL and HSE Department in respond to information requested by stakeholder.</li> <li>- Preventive &amp; Corrective Action: conducted evaluation to all regulation; to file all letter from pubic relation; give awareness to Safety Officer to document all risk analysis file.</li> </ul>	Comply						
<p><b>Criteria 3.2</b> The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.</p>									
3.2.1	<b>(C)</b> The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.	<p>Action Plan Ukui Estate:</p> <p>The use of Palm Pro as harvesting tools of Ukui Estate. Based on monitoring form Nov 2018 to Nov 2019, productivity kg/mandays of using Palm Pro pole are increase 20% at average compare to Aluminium Pole. The company has established mechanism for using Palm Pro as on Operational Readiness Package (ORP) Palm Pro (AA-ORP-ESTATE-01)dated 25 Feb 2019. The document consist of Introduction; Manual of Palm Pro; Guideline for maintenance and repair; Monitoring of Palm Pro.</p>	Comply						

		<p>To address social and environment impact assessment Ukui Estate has conducted dissemination on Fire Fighting on 11/09/2019</p> <p>Action Plan Ukui I POM:</p> <ol style="list-style-type: none"> <li>1. Environment:             <ul style="list-style-type: none"> <li>- Initiative Reduce Dirt: consistent using grading table, install automatic drain sand trap tank.</li> <li>- Initiative Water Management: re-use condensate water and kernel silo heater water; recycle turbine cooler water; recycle lab extraction cooler water.</li> <li>- Initiative power consumption: install transparent roof; using electricity from PLN; install poka yoke for welder trafo.</li> <li>- Initiative Reduce Shell burnt: keep steam boiler pressure in 8-10 kg/cm<sup>2</sup> during night stop press; install airlock feeding ripple mill; transform dry shell 2 to be production shell; standardize boiler equipment (cut off fuel gate, Automatic IDFan &amp; FDFan).</li> </ul> </li> <li>2. Operations, based on VE visit on 8 – 12 Jul 2019 by Sahat M. Sibuea as reported on VE-PUS-JUL-FULL-02-19:             <ul style="list-style-type: none"> <li>- Issue: door lock ring at sterilizer No.1-4 is began to wear. Action Plan: recondition of sterilizer lock ring.</li> <li>- Issue: threshing of gear bunch crusher is not consistent. Action Plan: performed greasing.</li> <li>- Issue: Gas yield is still low. Action Plan: added more sludge from Primary Anaerobe pond as 300 Ton/day and supplied with POME 7.2 ton/day started 25 Oct 2019.</li> </ul> </li> </ol> <p>Action Plan Scheme Smallholder:</p> <ol style="list-style-type: none"> <li>1. Problem: Anticipating illegal FFB loaded. Action: increase supervision of Assistant and Mandor in field by performing special job description, e.g. using % fruit</li> </ol>	
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		<p>density census, using estate format daily work plan, using fruit quality format (10 market place) and crosscheck hand counter at mill. Status: on going.</p> <ol style="list-style-type: none"> <li>2. Percentage of FFB in November 2019 is &lt; 16.64%. Action: conducted field inspection before harvesting, during harvesting and after harvesting.</li> <li>3. Maintenance of RSPO and training document. Action: updating RSPO documents, conduct training appropriate to work.</li> <li>4. Spraying team of Plasma shall be according to sustainability standard. Action: completed spraying tools according to sustainability standard, fixing administration and working system of spraying team (TUS), established standard warehouse for agrochemical at KUD Bukit Potalo, propose license to Environment Agency for KUD Bukit Potalo.</li> </ol>	
3.2.2	As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template.	RSPO Annual Communication of Progress 2019 of PT Inti Indosawit Subur has been available in RSPO website under membership number 1-0022-06-000-00.	Comply
<p><b>Criteria 3.3</b> Operating procedures are appropriately documented, consistently implemented and monitored.</p>			
3.3.1	<b>(C)</b> Standard Operating Procedures (SOPs) for the unit of certification are in place.	<p><b>Own Estates</b></p> <p>Estate has had Standard Operational Procedures (SOP) that covering entire operational activity as follows:</p> <ol style="list-style-type: none"> <li>1. SOP AA-APM-OP-1100.01-R4 dated 5 September 2016: <i>Pembibitan</i> (Nursery).</li> <li>2. SOP AA-APM-OP-1100.02-R3 dated 10 June 2015: <i>Penanaman Areal Baru</i> (New Planting).</li> <li>3. SOP AA-APM-OP-1100.03-R2 dated 24 July 2015: <i>Pembuatan dan Perawatan Jalan dan Jembatan</i> (Road and Bridge construction and maintenance);</li> <li>4. SOP AA-APM-OP-1100.04-R3 dated 7 Decmeber 2015: <i>Pembuatan dan Pemeliharaan Parit</i> (Drainage Construction and Maintenance).</li> <li>5. SOP AA-APM-OP-1100.05-R3 dated 23 November 2016: <i>Konservasi Tanah dan Air</i> (Soil &amp; Water Conservation).</li> </ol>	Comply

		<ol style="list-style-type: none"> <li>6. SOP AA-APM-OP-1100.06-R6 dated 16 February 2017: <i>Menanam kacang</i> (Planting cover crops).</li> <li>7. SOP AA-APM-OP-1100.07-R6 dated 16 February 2017: <i>Menanam Kelapa Sawit</i> (Planting Oil Palms).</li> <li>8. SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i> (Weed control).</li> <li>9. SOP AA-APM-OP-1100.09. R5 dated 26 December 2018: <i>Pemupukan</i> (Fertilizer application).</li> <li>10. SOP AA-APM-OP-1100.10. R6 dated 23 November 2016: <i>Pengendalian Hama dan Penyakit</i> (Pests &amp; Disease Control).</li> <li>11. SOP AA-APM-OP-1100.11. R1 dated 1 February 2009: <i>Pestisida dan Pengendaliannya</i> (Pesticide Handling).</li> <li>12. SOP AA-APM-OP-1100.12. R3 dated 23 November 2016: <i>Kastrasi</i> (Palm castration) explain cutting all generative product (mal flower, female flower, all fruit, to support vegetative growth) – done 5-6 months before being harvested.</li> <li>13. SOP AA-APM-OP-1100.13. R3 dated 4 March 2016: <i>Tunas Pokok</i> (Pruning).</li> <li>14. SOP AA-APM-OP-1100.14. R3 dated 16 February 2017: <i>Sensus dan Identifikasi Pokok</i> (Census and Palm Identification).</li> <li>15. SOP AA-APM-OP-1100.15. R2 dated 1 October 2010: <i>Sensus Produksi</i> (Production Census).</li> <li>16. SOP AA-APM-OP-1100.16. R1 dated 1 February 2009: <i>Konsolidasi Pohon Tumbang</i> (Provision of Support to Fallen Palm).</li> <li>17. SOP AA-APM-OP-1100.17. R1 dated 23 October 2014: <i>Pengelolaan Air</i> (Water Management).</li> <li>18. SOP AA-APM-OP-1100.18.R3 dated 20 April 2015: <i>Potong Buah</i> (Harvesting).</li> <li>19. SOP AA-APM-OP-1100.19.R1 dated 1 February 2009: <i>Pengelolaan Transport</i> (FFB Transport).</li> <li>20. SOP AA-APM-OP-1100.20-R6 dated 1 May 2019: <i>Peremajaan</i> (Replanting).</li> </ol> <p>Ukui II POM has documented and implemented procedure related to process of FFB to become CPO and PK, starts from FFB receiving to dispatch of CPO and PK:</p>	
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		<ol style="list-style-type: none"> <li>1. SOP AA-MPM-OP-1400.02.R2 dated 1 September 2011: <i>Stasiun Penerimaan</i> for FFB Receiving Station;</li> <li>2. SOP AA-MPM-OP-1400.03.R1 dated 1 February 2009: <i>Stasiun Rebusan</i> for Sterilizer;</li> <li>3. SOP AA-MPM-OP-1400.04.R1 dated 1 February 2009: <i>Stasiun Pemisahan Berondolan</i> for Loose Fruit Separation;</li> <li>4. SOP AA-MPM-OP-1400.05-R1 dated 1 February 2009: <i>Stasiun Pengadukan</i> dan Pengempaan for Pressing Station;</li> <li>5. SOP AA-MPM-OP-1400.06-R1 dated 1 February 2009: <i>Stasiun Pemurnian</i> for Clarification;</li> <li>6. SOP AA-MPM-OP-1400.07-R1 dated 1 February 2009: <i>Stasiun Pemisahan Nut dan Fiber</i> for Nut and Fiber Separation;</li> <li>7. SOP AA-MPM-OP-1400.08-R1 dated 1 February 2009: <i>Stasiun Kernel</i> for Kernel Station;</li> <li>8. SOP AA-MPM-OP-1400.09-R1 dated 1 February 2009: <i>Stasiun Boiler</i>;</li> <li>9. SOP AA-MPM-OP-1400.10-R1 dated 1 February 2009: <i>Stasiun Engine Room</i>;</li> <li>10. SOP AA-MPM-OP-1400.11-R1 dated 1 February 2009: <i>Stasiun Water Treatment</i>;</li> <li>11. SOP AA-MPM-OP-1400.12-R1 dated 1 February 2009: <i>Laboratorium</i>;</li> <li>12. SOP AA-MPM-OP-1400.13-R1 dated 1 February 2009: <i>Stasiun Pengelolaan Limbah</i> for Palm Oil Mill Effluent Treatment;</li> <li>13. SOP AA-MPM-OP-1400.14-R2 dated 1 September 2011: <i>Stasiun Penimbunan dan Pengiriman CPO dan Kernel</i> for CPO and PK Bulking and Despatch Operation;</li> <li>14. SOP AA-MPM-OP-1400.15-R1 dated 1 February 2009: <i>Perawatan</i> for Preventive Maintenance;</li> <li>15. SOP AA-MPM-OP-1400.19.R2 dated 1 September 2011: <i>Manajemen dan Metode Menghitung Emisi Gas Rumah Kaca (GHG)</i></li> <li>16. SOP AA-MPM-OP-1400.18-R4 Book Keeping</li> <li>17. AA-MPM-OP-1400.17-R6 Traceability</li> </ol> <p>Those document above are available in each units.</p> <p>During the audit, auditor has interviewed 3 harvesters from Afdeling II Ukui Estate</p>	
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		<p>regarding to frond stacking and pruning management. They can demonstrated the procedures of frond stacking in flat or undulating area and also pruning procedure. The harvester also demonstrated the right way to pruning in accordance to the SOP AA-APM-OP-1100.13. R3 dated 4 March 2016: <i>Tunas Pokok</i> (Pruning).</p> <p><b>Scheme Smallholder:</b> Scheme smallholder has had best management practices procedure as follows:</p> <ul style="list-style-type: none"> <li>• AA-PLASMA-PP-KS-01 <i>Pembibitan</i> (Nursery)</li> <li>• AA-APM-OP-1100.09-R3 <i>Pemupukan</i> (Manuring) dated 20 April 2015</li> <li>• AA-PLASMA-PP-KS-04 <i>Potong Buah</i> (Harvesting)</li> <li>• AA-PLASMA-PP-KS-05 <i>Pengangkutan TBS</i> (FFB Transport)</li> <li>• AA-APM-OP-1100.10-R5 <i>Pengendalian Hama dan Penyakit</i> (Pest and Disease Control) dated 11 January 2016</li> <li>• AA-APM-OP-1100.20-R5 <i>Peremajaan</i> (Replanting) dated 4 March 2016</li> <li>• AA-MM-508-1-RO <i>Penerimaan TBS Plasma</i> (FFB Plasma Receiving) 1 September 2015</li> <li>• AA-MM-508-2-RO <i>Penentuan Taksasi TBS Plasma</i> (FFB Plasma Estimation)</li> <li>• AA-APM-OP-1100.8-R5 <i>Pengendalian Gulma</i> (Weed Control)</li> <li>• AA-FA-220-2-RO <i>Stempel</i> (Stamp)</li> <li>• AA-MPM-OP-1400-17-R6 <i>Ketertelusuran</i> (Traceability) dated 1 September 2017</li> <li>• AA-APM-OP-1100.02-R3 <i>Penanaman Area Baru</i> (New Planting)</li> <li>• AA-SOP-ES-6001-R4 <i>Audit Internal Sustainability</i> (Internal Audit Sustainability)</li> <li>• AA-KL-12-EFP <i>Restorasi Riparian dan Areal di Sekitar Danau/Waduk dan Mata Air Lainnya</i> (Restoration of Riparian Area or Near Area of Lake/Damp or Water Sources) dated 1 August 2010</li> <li>• AA-HR-305.2-RO <i>Rekrutmen dan Seleksi Karyawan</i> (Recruitment and Selection of Employee).</li> </ul>	
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		<p>Based on field visit and interview with smallholder representatives in <i>KUD Sumber Bahagia, Karya Bersama and Usaha Baru</i> (17 - 18 December 2019) obtain information that they can describe the procedures of upkeep (manuring, chemical weeding and pruning) and harvesting in accordance with the procedures above.</p> <p>During the field visit in smallholder plot No. 125 <i>KUD Sumber Bahagia</i>, plot No. 14 <i>KUD Karya Bersama</i> and smallholder plot No. 303 <i>KUD Usaha Baru</i> sighted that the ground condition (circle, harvesting path, collection point and frond stacking) are well-maintained and well-monitored according to the procedures above. Pruning are in progress to achieved target in <i>KUD Usaha Baru</i>.</p>	
3.3.2	A mechanism to check consistent implementation of procedures is in place.	<p>To ensuring field implementation consistent with procedures, management has a mechanism such as:</p> <ul style="list-style-type: none"> <li>• Annual Visit Agronomy (VA) and Visit Engineering (VE). Last Visit Agronomy in Ukui Estate on 23 – 26 October 2019 and Visit Engineering of Ukui I POM are in 8 – 12 July 2019. The report and correctives action of the procedures are in places.</li> <li>• Annual Quality Control visit conducted by Quality Control Assistant.</li> </ul> <p>During the audit, auditor has interview QC staff for estate and mill. Through the interview obtain information as follows:</p> <ul style="list-style-type: none"> <li>• QC in estate conducted regularly at least once a month. The items that shall verify is quality of harvesting (circle, harvesting path and FFB/loose fruit left), manuring, upkeep in immature area and replanting. Result of QC visit scale with: 0 – 159 (poor), 160 – 180 (good) and 181 – 200 (excellence). Last report on 9 – 14 December 2019 showed that Ukui Estate are in 'excellence' status.</li> <li>• QC in mill conducted regularly at least once a month (minimum 4 man days). Items to check such as quality of sortation in loading ramp, sterilizer, USB check,</li> </ul>	Comply

		<p>LTDS, wet shell, fibre cyclone, temperature in clarification, kernel silo and press station, mass balance of solid and liquid and calibration of CPO/PK production in laboratory. Result of QC visit scale with: 0 – 250 (poor), 251 – 320 (good) and 321 – 400 (excellence). Last report on 23 – 25 November 2019 showed that Ukui I POM is in 'excellence' status.</p> <p><b>Scheme Smallholder:</b> Based on interview with Plasma Manager as ICS Manager in coordination with board of KUD has set the monthly management meeting to discuss issues related to best management practices, social, occupational safety and health, environment and any other issues. The meeting also discussed the improvements that will be made in the future.</p>	
3.3.3	Records of monitoring and any actions taken are maintained and available.	<p><b>Own Estates</b> During the audit, auditor has observe the records of following action after VA and VE report. There is some action plan to follow up the findings. Some issues that captured during the visit was the pruning progress.</p> <p><b>Scheme Smallholder:</b> Certificate holder has shown the monthly management meeting report that showed the recap of continuous improvement will be made in the future.</p>	Comply
<p><b>Criteria 3.4</b> A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.</p>			
3.4.1	<b>(C)</b> In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the	<p><b>Ukui I POM &amp; Estate:</b> The social environmental impact analysis documented in ANDAL, RKL RPL included consultation with relevant stakeholders to identify impacts and to develop any</p>	Comply

	<p>affected stakeholders and including the impacts of any smallholder/outgrower scheme, is documented.</p>	<p>mitigation measures. PT Inti Indosawit Subur – Ukui group is able to demonstrate environmental impact assessment in AMDAL document (Studi Analisis Dampak Lingkungan/ANDAL Perkebunan Kelapa Sawit Pola PIR – Transmigrasi dan Pabrik Minyak Kelapa Sawit/PMKS di Kabupaten Kampar, Indragiri Hulu dan Bengkalis Propinsi Riau). AMDAL document has approval as per “SK Menteri Pertanian No.013/ANDAL/HA/V/95” dated 05/05/1995. In addition, environmental management and monitoring plan - RKL/RPL as per “Surat Keputusan Menteri Pertanian No.03/RKL-RPL/BA/IV/1996” dated 04/04/1996. Initial SEIA was performed by Independent consultant PT Swastika Aryindo Buana, consist of the professional and competent assessor. SEIA document was included the impacts of any smallholder/outgrower scheme.</p> <p>PT Inti Indosawit Subur – Ukui Group has increase the mill capacity in 2009, Social Environmental Impact Assessment for mill capacity increase has been conducted and presented in “Dokumen Pengelolaan dan Pemantauan Lingkungan Hidup (DPPL) Peningkatan kapasitas PMKS dan Sarana Pendukung PT Inti Indosawit Subur Kebun Ukui”. DPPL document has been approved by Riau Governor as per “Surat Keputusan Gubernur Riau No.976/X/2009 tentang Dokumen Pengelolaan dan Pemantauan Lingkungan (DPPL) untuk Peningkatan Kapasitas PMKS dan sarana pendukung PT. IIS – Kebun Ukui untuk Kebun Inti dan Kebun Plasma dengan Kapasitas Ukui I POM (90 ton TBS/jam) dan Ukui II (75 ton TBS/jam)”, dated 28/10/2009. SEIA for mill capacity increase was performed by independent consultant PT Holistika Primagrahita, consist of the professional and competent assessor.</p> <p>Environmental Impact Assessment for Kernel Crushing Plant operation presented in “Dokumen Upaya Pengelolaan Lingkungan (UKL) dan Upaya Pemantauan Lingkungan (UPL) Kegiatan Pabrik Pengolahan Kernel Pada Pabrik PMKS Ukui - 1”. UKL-UPL document has been approved by Badan Lingkungan Hidup Kabupaten pelalawan (Environmental Agency Pelalawan regency) as per “Pengesahan Badan Lingkungan Hidup Kabupaten Pelalawan No.660/BLH-AM/2012/180 tanggal 22 Februari 2012 tentang Rekomendasi atas UKL-UPL Kegiatan Pembangunan KCP di Pabrik Ukui I”.</p>	
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		<p>Environmental impact assessment covered in ANDAL, RKL RPL document and environmental aspect and impact, e.g.:</p> <p><b><u>Pre construction:</u></b></p> <ul style="list-style-type: none"> <li>- Employee recruitment</li> </ul> <p><b><u>Construction:</u></b></p> <ul style="list-style-type: none"> <li>- Nursery</li> <li>- Land clearing and planting preparation</li> <li>- Infrastructure and supporting facility construction and development</li> <li>- Land preparation</li> <li>- Imature Palm oil plant upkeeping</li> <li>- Mill location planning</li> <li>- Palm Oil Mill construction</li> </ul> <p><b><u>Operation :</u></b></p> <ul style="list-style-type: none"> <li>- Mature plantation upkeeping</li> <li>- Soil and water conservation</li> <li>- Land application (waste water application to palm oil plantation) and EFB application</li> <li>- Harvesting and collecting FFB</li> <li>- FFB transportation to Palm Oil Mill</li> <li>- FFB Processing in Palm Oil Mill</li> <li>- Transportation facility providing and maintenance</li> <li>- CPO and PK transportation</li> <li>- Waste water processing</li> <li>- Replanting</li> <li>- Partnership cooperation</li> </ul> <p>Another Social Impact Assessment has been conducted by independent consultant from "Fakultas Kehutanan Institut Pertanian Bogor" on July 2010. The SIA method was taken by participatory ways and involving the affected stakeholder at study</p>	
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		<p>location in 19 villages consist of 11 villages at Pelalawan Regency and 8 Villages at Indragiri Hulu Regency.</p> <p>Social Environmental impact assessment was conducted through regular environmental monitoring, e.g. river water quality, mill effluent quality, air emission, economical condition, social and culture of community and wildlife conservation.</p> <p>Social Environmental monitoring and management report reported in regular basis each semester in "Laporan Pelaksanaan Izin Lingkungan". Report semester I (Period January – June 2019) has been sent to the government on 6 September 2019 (Dinas Lingkungan Hidup Kab. Pelalawan and Dinas Lingkungan Hidup dan Kehutanan Provinsi Riau, PPE Region Sumatera and to KLH/Ministry of Environment and Forestry). Evidence of report submission can be demonstrated in "Daftar Distribusi Eksternal" and "Tanda terima Elektronik Sistem Informasi Pelaporan Elektronik Lingkungan Hidup (SIMPEL) KLHK.</p> <p><b>Ukui Smallholder:</b></p> <p>Social Environmental Impact Assessment of Ukui Plasma has included in AMDAL document (Studi Analisis Dampak Lingkungan/ANDAL Perkebunan Kelapa Sawit Pola PIR – Transmigrasi dan Pabrik Minyak Kelapa Sawit/PMKS di Kabupaten Kampar, Indragiri Hulu dan Bengkalis Propinsi Riau).</p> <p>SEIA identified the significant potential environmental impacts deriving from operational activities such as land clearing, land development and road construction at palm oil plantations.</p> <p>Smallholder management also provide update SEIA for smallholder operation as per "Penilaian Dampak Sosial dan Lingkungan (SEIA) Kebun Plasma Ukui Tahun 2019".</p>	
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		<p>Smallholder manager has identified the social aspect and impact has identified such as:</p> <ul style="list-style-type: none"> <li>- Consistency of company for villages development</li> <li>- Company responsibility for road maintenance</li> <li>- Replanting activity</li> <li>- Harvesting and FFB transportation : air pollution and road condition, FFB stealing, FFB quality</li> <li>- FFB pricing mechanism</li> <li>- Labor recruitment and</li> <li>- Land legality</li> </ul> <p>Another Environmental aspect and impact evaluation was also conducted as per "Evaluasi Aspek – Dampak Lingkungan" EMS-431-002-LT updated on 3 January 2019.</p> <p>Involving of smallholder and stakeholder on SEIA were evident as per "Notulen Sosialisasi Rencana Kelola Sosial Terkait Aspek Permasalahan Sosial" dated 9 May 2019, participant from Local community villages representative, Cooperatives, Farmer group and Plasma Management wit number of participant 62 person.</p>	
3.4.2	<p>For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.</p>	<p><b>Ukui I POM &amp; Estate:</b></p> <p>Social Environment management and monitoring plan document were available in Environmental management plan (RPL-Rencana Pengelolaan Lingkungan) document. Document has been approved by Governor Riau as per "Surat Keputusan Gubernur Riau No.976/X/2009 tanggal 28 Oktober 2009 tentang Dokumen Pengelolaan dan Pemantauan Lingkungan. Environmental management based on document, e.g:</p> <ul style="list-style-type: none"> <li>- Air quality and noisy management from FFB processing performed by installing the emission monitoring facility in the boiler and genset stack; installing safety in boiler stack, install the cyclone and dust trap in boiler stack, control the emission, controlling fuel efficiency, emission measurement of vehicle, boiler and generator, standard knalpot usage, reduce the vehicle speed in emplacement, road maintenance and signboard installation, OHS implementation in Palm Oil Mill.</li> </ul>	

		<ul style="list-style-type: none"> <li>- Surface water quality and water biota management performed in order to prevent and control the physic and chemist quality of surface water comply to PP Nomor 82 tahun 2001. Perfomed by create terracing, land cover crop planting in open area and sloping area, organic fertilizer usage, natural predator usage for pest control, operating IPAL, land application, flat bed maintenance in land application area, housekeeping implementation and proper waste handling.</li> <li>- Soil quality management performed by land application management according to KepMen LH No. 28 Tahun 2003, groundwater quality check, flat bed maintenance, vegetation planting around waste water pond and maintenance of waste water pond, domestic and hazardous waste management.</li> <li>- Erossion and sedimentation management performed by creating and maintenance the individual terrace (tapak kuda) in area with slope 3 – 15% and maintain the land cover crop (Leguminosae), frond stacking and EFB application.</li> <li>- Flora fauna management perfomed by signboard installation regarding prohibition of plant destruction in conservation area, vegetation enrichment in conservation area, wildlife protection and maintain the conservation area.</li> <li>- Community perception management performed in order to prevent and control the negative perception and potential conflict from community against employee recruitment process. Company has conducted workers recruitment transparently, each vacancy were publish to surrounding village, FFB purchasing from local plantation surrounding company, coaching and conseling to plasma member, CSR progpramme implementation.</li> </ul> <p>During field observation and document verification, it can be demonstrated that all the environmental management plan has been implemented as per document RKL-RPL. The evaluation of social environmental management plan effectivity has been carried out and presented in RKL-RPL report semester I (January – June) 2019.</p> <p><b>Ukui Smallholder:</b></p>	
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		<p>Ukui Smallholder has develop the social environment management and monitoring plan as per "Rencana Kelola Sosial Terkait Aspek Permasalahan Sosial Kebun Plasma Ukui", covering:</p> <ul style="list-style-type: none"> <li>- Villages development, PT IIS – Ukui Group as a facilitator of Ukui Smallholder has responsibility to villages development by implementing CSR program.</li> <li>- Road condition, company has responsibility for road maintenance due to FFB transportation activity; Company provide the assistance of heavy equipment (grader, compactor, bacholoader) for road maintenance.</li> <li>- Replanting activity, company propose the replanting plan program for smallholder plantation and socialize to smallholder member.</li> <li>- FFB harvesting, company give the training to improve FFB quality from smallholder plantation, strict sanction to FFB stealing.</li> <li>- Air pollution by FFB transportation, company has a program for road maintenance minimum once a year.</li> <li>- FFB pricing mechanism, company informed the FFB price regularly according to pricing determination by Disbun Provinsi Riau.</li> </ul> <p>Ukui Smallholder Manager has developed mitigation plan to reduce environmental risks, presented in "Progress Perbaikan Lingkungan Kebun Plasma Ukui". Mitigation plan develop by Group Manager such as:</p> <ul style="list-style-type: none"> <li>- Optimize FFB transportation, by one way and not returning to the kavling/block to reduce the fossil fuel usage</li> <li>- TPH arrangement along the side collection road to become one way to ease the FFB transportation</li> <li>- Performing the proper fertilizing and appropriately to reduce the water pollution, prohibit to fertilizing in riparian areal (3 m from left and right side)</li> <li>- Use the appropriate PPE to reduce the impact of spraying activity and cooperate with TUS team PT Inti Indosawit to handling the chemical weeding in Plasma Ukui.</li> <li>- Proper application of fertilizer dan pesticide according to recommendation and handle by trained person.</li> <li>- Minimize the electrical usage to reduce the fosil fuel and air pollution.</li> </ul>	
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		<p>During site visit and interview with smallholder member in KUD Sumber Bahagia, KUD Karya Bersama and KUD Usaha baru, they have implementing the environmental impacts and contribute to reduce the environmental impact. For example, the ex fertilizer sack must be handled by triple rinse and use as loosefruit sack, the innerbag was delivered to collector; they aware about prohibition chemical activity near to the river and prohibition of animal hunting in the plantation area.</p>	
<p>3.4.3</p>	<p><b>(C)</b> The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p>	<p><b>Ukui I POM &amp; Estate:</b></p> <p>Social Environment management and monitoring plan as per RKL – RPL document has been implemented by PT Rigunas Agri Utama. The evidence of RKL – RPL implementation are evident in “Laporan Pelaksanaan Izin Lingkungan”. Based on verification on Environmental management and monitoring report, confirmed that the management and monitoring plan has been well implemented accordingly. Data verified during audit :</p> <ul style="list-style-type: none"> <li>- Air quality and noisy monitoring from FFB processing performed by emission measurement against Boiler and generator each semester, ambient air quality measurement each semester, noisy measurement (indoor and outdoor) each semester, odor measurement each semester. Air emission quality in Ukui I POM analyze by Sucofindo Testing Laboratory. Boiler emission, Biogas Engine emission and Genset emission test conducted on 18 July 2019. Report of sampling and analysis Certificate No. 26618, 26624, 26625, 26626, 26627, 26628, 26629, 26630/DBBPAM dated 7 August 2019; Analysis air emission of: Boiler 01, 02, 03, Genset 01 dan 02. According to report analysis of air emission can be demonstrated that all parameter analyzed was met with the standard and comply with Environmental Minister Decree No. PerMenLH No. 21/2008 Attachment IVA, Environmental Minister Decree No. Kep-07/MENLH/2007 Attachment I. Air ambient quality also tested by Sucofindo, Certificate of Analysis No. 01649/ALAIAM shown that the result of analysis was comply with Government Regulation No. 41/1999.</li> <li>- Surface water quality and water biota monitoring to prevent and control the physic and chemist quality of surface water comply to PP Nomor 82 tahun 2001.</li> </ul>	<p>Comply</p>

		<p>Performed by waste water quality monitoring each month, hazardous waste monitoring, land application monitoring, surface water quality monitoring each semester. Waste water quality monitoring analyze by UPT Laboratorium Bahan Konstruksi Dinas PU &amp; Penataan Ruang Prov. Riau. Waste water analysis result since January – September 2019 shown comply with regulation Peraturan Gubernur Riau No. 35 Tahun 2007 &amp; KepMENLH No. 28 tahun 2003. Surface water quality test (Sungai Pematang River and Air hitam river upstream and downstream) by Sucofindo on 17 May 2019 shown the result "Report of Analysis No. 01670/ALAIAM" is comply with Government Regulation of Republic Indonesia No. 82/2001.</p> <ul style="list-style-type: none"> <li>- Soil quality monitoring performed by soil sampling analysis in "rorak, antar rorak and lahan control", EFB application monitoring, groundwater analysis each year. Latest soil analysis conducted on 16 May 2019 by "Laboratorium Pengujian Kualitas Lingkungan Pro – Enviro Medan", Report of analysis No. 118-10/T/ENVIRO/VI/2019. Groundwater analysis conducted on 6<sup>th</sup> May 2019 in Well control of land application (LA) and non LA by UPT Laboratorium Bahan Konstruksi Dinas PU &amp; Penataan Ruang Prov. Riau. Report of Analysis No. MT.1/01.03.06.79.172 and MT.1/01.03.06.79.173 shown comply with regulation PerMenKes No. 416/MENKES/Per/IX/1990.</li> <li>- Erosion and sedimentation monitoring performed by erosion measurement according to USLE method. Measurement result since January – June 2019 shown erosion level between 2.88 – 14.70 ton/ha/year for Ukui Estate categorized as very good criteria.</li> <li>- Flora fauna monitoring performed by wildlife monitoring and monitoring the conservation area each month. Monitoring Since January - June 2019 shown that there were 7 species of mammal presence (Macaca fascicularis, Macaca nemestrina, Calosciurus notatus, Sus crofa, Rattus sp, Felis bengalensis, Musang), 13 species of birds (such as: Halcyon smyrnensis, Rhipidura javanica, Centropus bengalensis, Pycnonotus aurigaster), 4 species of reptile (Varanus salvator, fejevarya sp, Mabouya sp, Denrelaphis caudolineatus) in Ukui Estate Conservation area.</li> </ul>	
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		<ul style="list-style-type: none"> <li>- Community perception monitoring performed by community interview, employee data monitoring, interview with village head or public figure regarding their perception to company. Company has monitored the public perception through questioner each year. Questioner to public perception regarding the impact of company presence has been disseminated to surrounding community. Latest monitoring of public perception has been performed in 2018, questioner of public perception can be demonstrated and well documented in RKL-RPL report semester II 2018. Generally public perception was positive regarding the company presence and contribution to the surrounding community.</li> </ul> <p>All management and monitoring plan has been implemented well by company according to RKL-RPL document. The implementation report has been reviewed and reported to government agency per semester (six monthly).</p> <p>During field observation and document verification, it can be demonstrated that all the environmental monitoring plan has been implemented as per document RKL-RPL. The evaluation of environmental monitoring plan effectivity has been carried out and presented in RKL-RPL report semester I 2019. Evaluation consist of:</p> <ul style="list-style-type: none"> <li>- Trend evaluation of air ambient quality, air emission, odor, ground water quality, wate water quality, surface water quality, soil erosion shown that the result of monitoring are all parameter is met with the standard of regulation. Trend evaluation of water usage still under the budget/standard; biodiversity trend evaluation shown that there were still found the presence of animal including protected animal; Social economic trend evaluation shown increasing each year. Overall the trend evaluation shown the consistency and increasing in environmental performance.</li> <li>- Critical evaluation, the critical point in environmental monitoring is waste water quality and surface water usage. Based on the result of monitoring shown that waste water quality since January – June 2019 was met with regulation (BOD &lt; 5,000 mg/l and pH 6 – 9). Surface water usage trend is increasing due to increasing of FFB processed.</li> <li>- Compliance evaluation to regulation. According to evaluation of impact against soil erosion, water quality, soil quality, air quality, biodiversity, surrounding social and</li> </ul>	
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		<p>economic, health and safety, indicated that PT Inti Indosawit Subur – Ukui II POM has comply with all relevant regulation. Public perception monitoring for 2018 has been carried out and there is no negative perception occurred.</p> <p><b>Ukui Smallholder:</b></p> <p>Smallholder management has develop the social and environment management and monitoring plan. The plan realization was reviewed each quarter through participatory ways and involving the stakeholder.</p> <ul style="list-style-type: none"> <li>- Implementing the CSR programme such as: road infrastructure assistance, religious facility assistance and clean water provision</li> <li>- Socialization and assistance of replanting porogramme</li> <li>- BMP Coaching and training to smallholder to improve FFB quality</li> <li>- Harvesting training and PPE provision</li> </ul> <p>The realization of management and monitoring plan above can be demonstrated during audit. Review to management and monitoring plan was performed at the end of year (once a year).</p> <p>Smallholder management monitor the usage of ex fertilizer sack in Plasma Ukui each month. The monitoring record were evident in "Monitoring Penggunaan Bekas Karung Pupuk untuk Tempat Brondolan" period January – October 2019. Sample seen for KUD Sumber Bahagia, KUD Karya Bersama and KUD Usaha Baru.</p> <p>Smallholder management also monitor the implementation of mitigation plan to reduce the environmental impact such as: ensure the TUS team not performing spraying work near to the river (3 m from left and right side), ensure there is no illegal hunting in plantation area of Plasma Ukui.</p>	
<p><b>Criteria 3.5</b> A system for managing human resources is in place.</p>			

<p>3.5.1</p>	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives.</p>	<p>The company has procedure no. SOP AA-HR-305.2-RO (Rekrutmen dan Seleksi Karyawan) which regulated that hiring and promotion of workers are based on skill, work experiences, and job evaluation.</p> <p>Promotion and upgrade are based on employee appraisal conducted annually as outlined in the Employee Assessment Form signed by the employee concerned, approved by the line manager and checked by the General Manager. For example:</p> <ul style="list-style-type: none"> <li>• Promotion form temporary to permanent workers, based on Memorandum No. 009/HR-RO2/MEMO/SK/02/2019, dated 15 Januari 2019, on behalf of Mr. Solikhin as Petugas Pengiriman.</li> <li>• Promotion form temporary to permanent workers, based on Memorandum No. 012/HR-RO2/MEMO/SK/02/2019, dated 15 Januari 2019, on behalf of Mr. Rudi Wahono as Pembantu Operator Biogas.</li> <li>• Promotion form temporary to permanent workers, based on Memorandum No. 011/HR-RO2/MEMO/SK/02/2019, dated 15 Januari 2019, on behalf of Mr. Kornelius Simamora as Pembantu Operator Biogas.</li> </ul> <p>The decree associated with the rapture/promotions and recruitment made into a duplicate 2, namely 1 copies for HRD and 1 copies for employees. Based on the interview with employees at the time of audit, that promotion document or the receipt of diberikan employees to employees and well maintained.</p> <p><b>Ukui Smallholder:</b></p> <p>Ukui smallholder has had procedure of recruitment in form "Mekanisme Penerimaan Karyawan" dated 20 January 2017. The procedure describes the process and requirement for recruitment is based on skill, work experiences, and job evaluation.</p>	<p>Comply</p>
<p>3.5.2</p>	<p>Employment procedures are implemented and records are maintained.</p>	<p>The Procedure no. SOP AA-HR-305.2-RO (Rekrutmen dan Seleksi Karyawan) and procedure Mekanisme Penerimaan Karyawan at Plasma are based on skill, work</p>	

		experiences, and job evaluation. The form indicates that there is no indication of employment discrimination in terms of ethnicity, caste, religion, disability, gender, sexual orientation, union membership, political affiliation and/or age.	
<b>Criteria 3.6</b> An Occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	<b>C)</b> All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.	<p>PT Inti Indosawit Subur – Ukui I POM has prepared risk assessment for each unit, covering all location and activities.</p> <p>Hazard Identification Risk Assessment and Control (HIRAC) / Analisa Resiko last review on 12<sup>th</sup> April 2019.</p> <p>A regular noise test conducted to the engine room and sterilizer, where found above standard PPE, such as ear plug provided for the operator.</p> <p>Ukui I POM has shown the document of risk assessment cover processes and activities attached to the realisation of CPO production, such as: weighing bridge, boiler, engine room, loading ramp, sterilizer, threshing, pressing, kernel operation, clarification, office, laboratory, CPO dispatch, water treatment, chemical warehouse and firefighting simulation.</p> <p>Risk assessment in Ukui Estate has covered on processes and activities attached to the realisation of FFB production, such as: spraying, fertilizing, weeding, replanting, road maintenance, harvesting, transportation, warehouse, workshop, infrastructure, policlinic and office.</p> <p>Scheme Smallholders Ukui Group (sample: KUD Sumber Bahagia, KUD Karya Bersama and KUD Usaha Baru):</p>	Comply

		<p>ICS (Plasma) has demonstrated the document of risk assessment under "Dokumen Hazard Identification Risk Assessment and Control (HIRAC)/Analisis Risiko" including each KUD (smallholders), last review was conducted on 7<sup>th</sup> Januray 2019. The document has covered for all activities in smallholders (Plasma), e.g: harvesting, transport of FFB, manuring, application of pesticides (spraying), lose fruit evacuation, weighing of FFB.</p>	
3.6.2	<p><b>(C)</b> The effectiveness of the H&amp;S plan to address health and safety risks to people is monitored.</p>	<p>Occupational Health and Safety Policy, lined out in the Company Policy signed on 01/12/2014. Chapter 4 mentioned "...to determine measurable objective and target to prevent accident and occupational disease for all worker and other interested parties, through continuous improvement".</p> <p>The policy is written in Bahasa Indonesia as standard language and has been socialized to all workers, e.g:</p> <ul style="list-style-type: none"> <li>- List of attendance on socialization of company policy, dated 20<sup>th</sup> April 2019</li> <li>- The Policy displayed in publication board in office</li> </ul> <p>PT Inti Indosawit Subur – Ukui I POM has prepared the procedure related to OHS, e.g:</p> <ol style="list-style-type: none"> <li>1. "Standard Operating Procedure Alat Pelindung Diri" on personal protective equipment No.AA-SOP-OP-101.3-R0 dated 14/08/2013</li> <li>2. "Prosedur Pengendalian Kebakaran di Pabrik, Kantor dan Perumahan" for fire mitigation No.AA-KL-15-EP dated 01/12/2010</li> <li>3. Standard Operational Procedure – Identifikasi Bahaya, Penilaian Risiko dan Penentuan Pengendalian" No AA-SMK3-02-RO, dated 3<sup>rd</sup> August 2017.</li> <li>4. "Standard Operational Procedure - Investigasi Kecelakaan Kerja" No AA-SMK3-01-RO, date issued 1<sup>st</sup> August 2017</li> </ol>	Comply



		<p>PT Inti Indosawit Subur – Ukui I POM has also prepared the OHS Pogram as per “Objective and Program PT Inti Indosawit Subur –Ukui Group 2019”, the program consisted of:</p> <ol style="list-style-type: none"> <li>1. Meeting of P2K3 (OHS committee) every month</li> <li>2. Refresh training related to OHS, e.g: basic fire training, OHS training and OHS workshop</li> <li>3. Emergency infrastructure checklist</li> <li>4. Medical check-up program both of general and special MCU</li> <li>5. Providing the PPE for workers in high risk area, inspection of PPE using,</li> <li>6. Inspection on using of PPE for all employee</li> <li>7. Mitigation the risk identified in Estate and Mill</li> <li>8. Comply with relevant/applicable regulation related to OHS</li> <li>9. Prepared/prevent for emergency situation, e.g: basic fire training plan, training for first aider,</li> <li>10. Safety Briefing</li> <li>11. Fire Basic Training for Mill</li> <li>12. Electrical Basic Training for Mill</li> </ol> <p>Scheme Smallholders Ukui Group (sample: KUD Sumber Bahagia, KUD Karya Bersama and KUD Usaha Baru):</p> <p>All cooperatives (KUD’s) has established the policy related to OHS under “Kebijakan Koperasi”, dated 3<sup>rd</sup> January 2019, was signed by Manager of Group ICS, in point 3 mentioned “Menerapkan dan memelihara system manajemen lingkungan, social, keselamatan pangan, kesehatan dan keselamatan kerja terpadu”</p> <p>The policy has communicated to smallholder member and displayed in publication board in each KUDs office.</p>	
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		OHS Program available under "Rencana Kesehatan Keselamatan Kerja dan Prosedur Kesehatan dan Keselamatan Kerja tahun 2019", available for each KUD's e.g: KUD Sumber Bahagia, KUD Karya Bersama and KUD Usaha Baru. The OHS plan has prepared bases on result of risk assessment and control specific for providing PPE (providing, monitoring of usage and training related to PPE usage).																									
<b>Criteria 3.7</b>																											
All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.																											
3.7.1	<b>(C)</b> A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and outgrowers, taking into account gender-specific needs, and which covers applicable aspects of the RSPO P&C, in a form they understand, and which includes assessments of training.	<p>The company was able to demonstrate "Kalender Pelatihan Tahun 2019". It is a program for training of environment and sustainability in Asian Agri Learning Institute.</p> <table border="1"> <thead> <tr> <th>Training Subject</th> <th>Operation Unit</th> <th>Attendance</th> <th>Schedule</th> </tr> </thead> <tbody> <tr> <td>Sustainability Awareness</td> <td>Ukui Estate, Plasma Ukui, Ukui I &amp; II POM, Soga Estate</td> <td>Staff and Non Staff</td> <td>12 Mar 2019</td> </tr> <tr> <td>Traceability and Mass Balance</td> <td>Ukui I &amp; II POM</td> <td>Staff and Non Staff</td> <td>8-9 Nov 2019</td> </tr> <tr> <td>HCV Awareness</td> <td>Ukui Estate, Plasma Ukui, Ukui I &amp; II POM, Soga Estate</td> <td>Staff and Non Staff</td> <td>14 Mar 2019</td> </tr> <tr> <td>Basic Fire</td> <td>Ukui Estate, Plasma Ukui, Ukui I &amp; II POM, Soga Estate</td> <td>Staff and Non Staff</td> <td>14 Mar 2019</td> </tr> <tr> <td>First Aider</td> <td>Ukui Estate, Plasma Ukui, Ukui I &amp; II POM, Soga Estate</td> <td>Staff and Non Staff</td> <td>13 Aug 2019</td> </tr> </tbody> </table>	Training Subject	Operation Unit	Attendance	Schedule	Sustainability Awareness	Ukui Estate, Plasma Ukui, Ukui I & II POM, Soga Estate	Staff and Non Staff	12 Mar 2019	Traceability and Mass Balance	Ukui I & II POM	Staff and Non Staff	8-9 Nov 2019	HCV Awareness	Ukui Estate, Plasma Ukui, Ukui I & II POM, Soga Estate	Staff and Non Staff	14 Mar 2019	Basic Fire	Ukui Estate, Plasma Ukui, Ukui I & II POM, Soga Estate	Staff and Non Staff	14 Mar 2019	First Aider	Ukui Estate, Plasma Ukui, Ukui I & II POM, Soga Estate	Staff and Non Staff	13 Aug 2019	Comply
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		<p>Scheme Smallholder: Plasma Ukui has established Training Program for KUD, KT and farmer member for year 2019. Training consist of:</p> <table border="1"> <thead> <tr> <th>Subject</th> <th>Plan</th> <th>Realisation</th> <th>Planned attendance</th> <th>Actual attendance</th> </tr> </thead> <tbody> <tr> <td>RSPO P&amp;C for Group Certification</td> <td>03/08/2019</td> <td>03/08/2019</td> <td>80</td> <td>55</td> </tr> <tr> <td>PPE (Basic Safety)</td> <td>20/04/2019</td> <td>20/04/2019</td> <td>40</td> <td>62</td> </tr> <tr> <td>HCV, EIA and Soil and water conservation</td> <td>19/10/2019</td> <td>19/10/2019</td> <td>50</td> <td>50</td> </tr> <tr> <td>OHS (Basic Safety)</td> <td>20/04/2019</td> <td>20/04/2019</td> <td>40</td> <td>62</td> </tr> <tr> <td>First Aid</td> <td>20/04/2019</td> <td>20/04/2019</td> <td>40</td> <td>62</td> </tr> <tr> <td>Basic Fire</td> <td>24/10/2019</td> <td>24/10/2019</td> <td>114</td> <td>114</td> </tr> <tr> <td>Limited pesticide application</td> <td>24/05/2019</td> <td>24/05/2019</td> <td>124</td> <td>124</td> </tr> <tr> <td>Weed control</td> <td>03/08/2019</td> <td>03/08/2019</td> <td>70</td> <td>70</td> </tr> <tr> <td>Fertilizer application</td> <td>03/08/2019</td> <td>03/08/2019</td> <td>70</td> <td>70</td> </tr> <tr> <td>Integrated pest management</td> <td>20/07/2019</td> <td>03/08/2019</td> <td>70</td> <td>70</td> </tr> <tr> <td>Harvesting</td> <td>09/02/2019</td> <td>06/03/2019</td> <td>60</td> <td>69</td> </tr> </tbody> </table>	Subject	Plan	Realisation	Planned attendance	Actual attendance	RSPO P&C for Group Certification	03/08/2019	03/08/2019	80	55	PPE (Basic Safety)	20/04/2019	20/04/2019	40	62	HCV, EIA and Soil and water conservation	19/10/2019	19/10/2019	50	50	OHS (Basic Safety)	20/04/2019	20/04/2019	40	62	First Aid	20/04/2019	20/04/2019	40	62	Basic Fire	24/10/2019	24/10/2019	114	114	Limited pesticide application	24/05/2019	24/05/2019	124	124	Weed control	03/08/2019	03/08/2019	70	70	Fertilizer application	03/08/2019	03/08/2019	70	70	Integrated pest management	20/07/2019	03/08/2019	70	70	Harvesting	09/02/2019	06/03/2019	60	69	
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<p>3.7.2</p>	<p>Records of training are maintained, where appropriate on an individual basis.</p>	<p>Record of training are available, such as training attendant list, as sample described below:</p> <ul style="list-style-type: none"> <li>- Training attendance list dated 31/03/2017, regarding use of spraying tools, attended by 38 spraying workers of Soga Estate, Sei Lala Estate and Ukui Estate.</li> <li>- Training attendance list dated 16/09/2019, regarding basic fire, attended by 26 workers of Ukui I POM, Ukui II POM, Soga Estate, Sei Lala Estate and Ukui Estate.</li> <li>- Training attendance list dated 22/10/2019, regarding refreshment of integrated pest management, attended by 16 workers of Soga Estate, Sei Lala Estate and Ukui Estate.</li> <li>- Training attendance list dated 24/05/2019, regarding limited pesticide application, attended by 31 workers of Ukui Plasma; 25 workers of Ukui Estate; 21 workers of Sei Lala Estate; 15 workers of Soga Estate.</li> <li>- Training attendance list dated 28-29/11/2019, regarding limited OHS inspection and job safety analysis, attended by 38 workers of Ukui I POM, Ukui II POM, Ukui Plasma, Ukui Estate; Sei Lala Estate, Soga Estate.</li> <li>- Training attendance list dated 16/10/2019, regarding dissemination of hazardous and domestic waste handling, attended by 13 Office workers of Ukui Estate.</li> </ul> <p>Personal Data Training of staff, workers and Scheme Smallholders are available, e.g.:</p> <ul style="list-style-type: none"> <li>- Hans MF Pinem, Sustainability Staff of Ukui Estate, has attend training of First Aider on 28/11/2019; OHS on 29/11/2019; Basic Fire on 11/04/2019; environment impact and aspect on 18/11/2019; limited pesticide use on 24/04/2019.</li> <li>- Gani Mulya, Fire Fighter of Ukui Estate, has attend training of OHS on 11/04/2019; First Aider on 14/07/2017.</li> <li>- Daniel Simanjuntak, KTU of Ukui Estate, has attend training of First Aider on 28/11/2019; OHS on 29/11/2019; Administration SOP on 15/11/2019; limited pesticide on 24/05/2019.</li> </ul>	<p>Comply</p>
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		<ul style="list-style-type: none"> <li>- Edisah Lubis, Production Clerk of Ukui I POM, has attend training of GHG calculation on 19/05/2019; SOP Mass Balance and Traceability on 07/09/2019.</li> <li>- Rifa Andila, Workshop Foreman of Ukui I POM, has attend training of Total production maintenance on 18/06/2019; uses of fire extinguisher and hydrant on 12/04/2019; mill policy manual on 18/02/2019; working instruction on 08/01/2019; company policy on OHS and environment on 07/01/2019.</li> <li>- Raja Maskar, Loading Ramp operator of Ukui I POM, has attend training of Total production maintenance on 18/06/2019; uses of fire extinguisher and hydrant on 12/04/2019; mill policy manual on 18/02/2019; working instruction on 08/01/2019; company policy on OHS and environment on 07/01/2019.</li> <li>- Lamijo, Mandor Plasma Ukui SP 1A, has attend training of RSPO P&amp;C for Group Certification on 03/08/2019; PPE (Basic Safety) on 20/04/2019; HCV, EIA and Soil and Water Conservation on 19/10/2019; OHS on 20/04/2019; First Aid on 20/04/2019; Basic Fire on 26/10/2019; limited pesticides on 24/05/2019; weed control on 03/08/2019; fertilizer application on 03/08/2019; integrated pest management on 03/08/2019; harvesting on 06/03/2019.</li> <li>- Muhamad Yusuf Nasution, Mandor Plasma Ukui II, has attend training of RSPO P&amp;C for Group Certification on 03/08/2019; PPE (Basic Safety) on 20/04/2019; HCV, EIA and Soil and Water Conservation on 19/10/2019; OHS on 20/04/2019; First Aid on 20/04/2019; Basic Fire on 26/10/2019; limited pesticides on 24/05/2019; weed control on 03/08/2019; fertilizer application on 03/08/2019; integrated pest management on 03/08/2019; harvesting on 06/03/2019.</li> </ul>	
3.7.3	Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.	Refreshment Training of RSPO SCCS in Ukui I POM has been performed on 07/09/2019, attended by Sona Evan (KTU), Edisyah Lubis (Production Clerk), Herta Muniarti and Nila Sari (Weighbridge Clerk), Solikin (Despatch Clerk), Medi (Security), Januar (Assistant Biogas and KCP), Irwan Sinaga (Mandor Proses) and Josep S. (Assistant Process).	Comply
<p><b>Supply chain requirements for mills.</b></p> <p><b>Procedural note:</b></p>			

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

<b>Definition</b>			
Identity Preserved Mill D.1	<p>A mill is deemed to be Identity Preserved (IP) if the FFB used by the mill are sourced from plantation/ estates that are certified against the RSPO Principles and Criteria (RSPO P&amp;C), or against the Group Certification scheme.</p> <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Module E is applicable.</p>	<p>PT Inti Indosawit Subur – Ukui I POM implements RSPO Supply Chain model Identity Preserved (Module E – CPO Mill: Mass Balance).</p> <p>Not applicable.</p>	N/A
Mass Balance Mill E.1	<p>Certification for CPO mills is necessary to verify the volumes of certified and uncertified FFB entering the mill and sales volume of RSPO certified products. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	<p>PT Inti Indosawit Subur – Ukui 1 POM holds current RSPO P&amp;C Certificate No RSPO 633774. In the current certificate, PT Inti Indosawit Subur – Ukui I POM uses Mass Balance supply chain model. The mill only claimed the FFB proportion from certified supply bases, which comprise of company-own estate (Ukui Estate) and Scheme Smallholder (Ukui Plasma). The other supply base, were come from third party suppliers as non-certified FFB source.</p>	Comply
<b>Explanation (Volume and product integrity)</b>			

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<p>D.2 E.2</p>	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&amp;C certification report. For an independent mill, the estimated tonnage of CPO and PK products shall be recorded in the RSPO IT platform, supply chain certificate and public summary audit report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p> <p>The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organisation (RSPO IT platform).</p>	<p>The estimated tonnage of CPO and PK products that could potentially produced by PT Inti Indosawit Subur – Ukui I POM has been recorded in BSI’s public summary report.</p> <p>The estimated tonnage of certified CPO and PK are available in the Ukui I POM annual production budget for 2020 and in Management Plan 2018 – 2024.</p> <p>All FFB are received from certified supply bases, which are from:</p> <ul style="list-style-type: none"> <li>– Company-owned estates, e.g: Ukui Estate</li> <li>– Scheme Smallholders, Ukui Plasma; consist of 9 (nine) Smallholder cooperatives, e.g.: KUD Sumber Makmur, KUD Bina Usaha Mandiri, KUD Bakti, KUD Karya Bersama, KUD Sawit Subur, KUD Bina Sejahtera, KUD Sumber Bahagia, KUD Bukit Potalo and KUD Usaha Baru.</li> </ul> <p>PT Inti Indosawit Subur – Ukui I POM has met registration and reporting requirement as it has been registered in RSPO IT Platform (PalmTrace) with ID number RSPO_PO 1000000148.</p>	<p>Comply</p>
<p><b>5.3 Documented procedures</b></p>			
<p>5.3.1 D.3 E.3</p>	<p>The site shall have written procedures and/or work instructions to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> <li>• Complete and up to date procedures covering</li> </ul>	<p>PT Inti Indosawit Subur - Ukui I POM demonstrates Standard Operating Procedures which complete and up to date covering the implementation of all the elements in RSPO Supply Chain requirements, e.g.:</p> <p>PT Inti Indosawit Subur – UKUI I POM can demonstrate procedures, such as:</p> <ol style="list-style-type: none"> <li>1. Traceability AA-MPM-OP-1400.17.R7 with latest revision dated 1 Oct 2019. The procedures cover traceability of palm products (CPO and PK) since receiving of</li> </ol>	<p>Comply</p>

	<p>the implementation of all the elements of the supply chain model requirements.</p> <ul style="list-style-type: none"> <li>• Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</li> <li>• Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the organisation’s procedures for the implementation of this standard.</li> <li>• The site shall have documented procedures for receiving and processing certified and non-certified FFBs.</li> </ul>	<p>fresh fruit bunches from Ukui Estate and 10 (ten) scheme smallholder cooperatives, processing of up to shipping of CPO and PK as well as Daily production report Ukui I POM.</p> <p>The procedure also regulates the internal audit by Sustainability Internal Audit Manager 2 (two) times in a year (Section 5.7). Traceability records are to be kept for 10 (ten) years (Section 6.9). The SOP Traceability covers responsibility for implementation of RSPO Supply Chain Module D: CPO Mills Identity Preserved, such as:</p> <ul style="list-style-type: none"> <li>- Weighbridge operator responsible to input data on FFB receiving and delivery of CPO and PK.</li> <li>- Production supervisor prepared data for daily monitoring for: certified FFB received; FFB processed; production of certified CPO and PK; oil extraction rate for certified CPO and PK; delivery of certified CPO and PK; initial stock and ending stock of certified CPO and PK;</li> <li>- Administration officer creates certified CPO and PK daily delivery recapitulation, per delivery order proposed by Marketing Manager.</li> <li>- Mill manager signed the daily production report after verification.</li> <li>- Production supervisor and administration officer prepares the daily production report.</li> <li>- Marketing Manager creates delivery order with clear identity.</li> </ul> <p>2. Standard Operating Procedure – Book Keeping (AA-MPM-OP-1400.18-R4) revision dated 25 February 2015. The procedure explains job and responsibility of Production clerk, KTU and Mill Manager in making “Book Keeping” documentation. Head of Environmental and Sustainability will inform to certification body if there is case of projected overproduction (Section 6.5).</p> <p>3. Standard Operating Procedure – RSPO PalmTrace System (AA-SM-405.2-R3) dated 1 Jan 2018. The procedure described job and responsibility of Trader, Logistic, Shipment and PPIC on carried out process of transaction input in RSPO PalmTrace system.</p>	
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		<p>PT Inti Indosawit Subur – UKUI I POM is able to demonstrate complete and up-to-date records and report demonstrating compliance with the supply chain’s general requirement and modular requirement, including training records (see indicator 3.7.3).</p> <p>As per Procedure of Traceability (AA-MPM-OP-1400.17-R7) Chapter 5.7 mentioned that the Mill Manager ensure all operation and administration activities are comply to the sustainability and RSPO Supply Chain requirements.</p> <p>During audit, PIC is able to demonstrate sufficient knowledge and understanding on RSPO supply chain implementation for palm oil mill.</p>	
<b>5.3.2 Internal Audit</b>			
5.3.2	<p>The site shall have a written procedure to conduct annual internal audit to determine whether the organisation;</p> <ul style="list-style-type: none"> <li>• Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</li> <li>• Effectively implements and maintains the standard requirements within its organisation.</li> </ul> <p>Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non- conformities shall be subject to management review at least annually. The organisation shall be able to maintain the internal audit records and reports.</p>	<p>As per Procedure of Traceability (AA-MPM-OP-1400.17-R6) chapter 5.7, Sustainability Internal Audit Manager conducted internal audit to ensure implementation and administration are comply to the requirement in RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. Internal audit shall be conducted 2 (two) times in a year at minimum, to ensure all operational and documentation activities are comply with the requirement in RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. For year 2019, internal audit performed on 7 January and 23 October 2019.</p> <p>Non-conformities found during internal audit have been reviewed in the management review dated 26 Oct 2019.</p>	Comply

5.4 Purchasing Goods In			
<p>D.4.1/ D.4.2 E.4.1/ E.4.2</p>	<p>The site shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBS received.</p> <p>The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.</p>	<p>PT Inti Indosawit Subur – Ukui I POM has demonstrated SOP of Traceability (AA-MPM-OP-1400.7.R7), chapter 5.1 indicates the Weighbridge Clerk has responsibility to input data and print weighbridge card based on “Surat Pengantar TBS”, covering information e.g. estate name and block number, mill name, date of delivery, product description and quantity, RSPO certificate number, transporter identity and unique identification number.</p> <p>PT Inti Indosawit Subur – Ukui I POM receive FFB from certified and non-certified source.</p> <ul style="list-style-type: none"> <li>– Certified source consist of own estate (Ukui Estate) and Scheme Smallholder (Kebun Plasma Ukui), e.g: KUD Sumber Makmur, KUD Bina Usaha Baru, KUD Bakti, KUD Karya Bersama, KUD Sawit Subur, KUD Bina Sejahtera, KUD Sumber Bahagia, KUD Bukit Potalo and KUD Usaha Baru.</li> <li>– Non-certified FFB sourced from third party supplier, consist of CSV (Create Share Value), which is independent smallholder that coached by the company: Sutarno Kudin (SK); Haluga (HL); Samsuwar (SM); Budi (BD); Suhono (SN); and Non CSV: Karyono (KR); Budianto (BDNT); Gunaji (GJ); Gunawan Suprayitno (GS); Toni Bisono (TB); Satumar (STM); Moh Misnan (MM); Parji; Salijan; KT Bina Mandiri Bersama.</li> </ul> <p>Document “Surat Pengantar TBS” (FFB Delivery Note) and Kartu Timbangan (Weighbridge Card) described identity and location of FFB source and other item required.</p> <p>Data verified:</p> <p><u>Certified:</u></p>	<p>Comply</p>

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		<ul style="list-style-type: none"> <li>- Daily Production Report of Ukui I POM: "Laporan Harian Pabrik" dated 30 Nov 2019; described FFB received from Ukui Estate on the day is 168.25 MT; todate is 4,766.34 MT; to the Month November is 54,306.90 MT. FFB received from Scheme Smallholder (Plasm Ukui) on the day is 255.62 MT; todate is 10,242.62 MT; to the Month November is 128,024.48 MT. Total FFB Sustainable received on the day is 442.98 MT; todate is 15,319.31 MT; to the Month November is 183,023.29 MT. FFB received from outside supplier on the day is 330.87 MT; todate is 8,500.39 MT; to the Month November is 90,980.81 MT. FFB received total on the day is 773.84 MT; todate is 23,839.88 MT; to the Month November is 274,111.470 MT.</li> <li>- Weighbridge Card #PUSA119109598 dated 27/11/2019, commodity is certified FFB; source: Ukui Estate Division 3; deliver to Ukui I Palm Oil Mill; net weight: 5,750 kg; amount: 257 bunch; Block: C89j; RSPO Cert: RSPO 633774; Transporter: Internal; Vehicle: BM 9021 TC; Driver: Andi; Batch number: 13-100-16462019-10101188.</li> <li>- Weighbridge Card #PUSA119108491 dated 22/10/2019, commodity: certified FFB; source: Ukui Estate Division 4; deliver to Ukui I Palm Oil Mill; net weight: 6,790 kg; amount: 223 bunch; Block: C89k; RSPO Cert: RSPO 633774; Transporter: Internal; Vehicle: BM 8463 TC; Driver: Supadi; Batch number: 13-100-16462019-10090225.</li> <li>- "Bon Pengantar TBS" No.P.04 dated 27/11/2019 from Ukui Plasma, KUD Karya Bersama, Farmer Group No.07 (SP 3BC). Weighbridge Card #PUSA219116393 dated 27/11/2019; commodity: certified FFB; source: Ukui Plasma; deliver to Ukui I Palm Oil Mill; net weight: 9,252 kg; location: KT 07 - Karya Makmur; amount: 361 bunch; Block: K1007; RSPO Cert: RSPO633774; Transporter: Internal PLasma; Vehicle: BM 9588 CC; Driver: Yono; Batch number: 13-100-24262019-10101082.</li> <li>- Bon Surat Pengantar TBS No.P.004 dated 11/11/2019 from Ukui Plasma, KUD Sumber Bahagia, Farmer Group Elang Sakti (No.118). Weighbridge Card #PUSA219115701 dated 12/11/2019; commodity: certified FFB; source: Ukui Plasma; deliver to Ukui I Palm Oil Mill; net weight: 5,457 kg; location: KT-118</li> </ul>	
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		<p>(Elang Sakti); amount: 222 bunch; Block: K3118; RSPO Cert: RSPO633774; Transporter: Internal Plasma; Vehicle: BM 9485 FK; Driver: Jumari; Batch number: 13-100-24262019-10096356.</p> <p><u>Non-certified:</u></p> <ul style="list-style-type: none"> <li>- Surat Pengantar TBS No.L012 dated 17/12/2019 from KT Bina Mandiri Bersama to PT Inti Indosawit Subur – Ukui I Palm Oil Mill; amount: 667 bunch. Weighbridge Card #PUSA519110723 dated 17/12/2019; commodity: Outside FFB; source: KT Bina Mandiri Bersama – ID A009; deliver to PT Inti Indosawit Subur – Ukui I Palm Oil Mill; net weight: 12,010 kg; Transporter: general; Vehicle: BM 8037 CI; Driver: Teguh.</li> <li>- Surat Pengantar TBS No.0018707 dated 22/10/2019 from Asosiasi Petani Sawit Swadaya Amanah to PT Inti Indosawit Subur – Ukui I Palm Oil Mill; amount: 468 bunch. Weighbridge Card #PUSA519109096 dated 22/10/2019; commodity: Outside FFB; source: Amanah (APSSA) – ID ST00072 to PT Inti Indosawit Subur – Ukui I Palm Oil Mill; net weight: 10,744 kg; Transporter: general; Vehicle: BM 9367 CI; Driver: Ucil.</li> </ul>	
<b>5.5 Outsourcing Activities</b>			
5.5.1	<p>In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the operation seeking or holding certification shall ensure that the independent third party complies with the requirements of the RSPO Supply Chain Certification Standard. A CPO mill and independent mill cannot outsource processing activities like refining or crushing.</p>	<p>The transport for RSPO certified sustainable CPO and PK delivery were carried out by numbers of transporter, e.g.:</p> <p>CPO:</p> <ul style="list-style-type: none"> <li>• CV Teman Setia, Contract based on “Perjanjian Pengangkutan” No.12/X/SK-IIS/2019 dated 1 Oct 2019. Address: Jl. Kisaran KM 5.5 Medan. Represented by Mr. Agus Salim. This contractor was appointed, contracted and instructed by PT Inti Indosawit Subur. Address: Jl. MH. Thamrin No.31 Jakarta Pusat. Contract for transport of CPO and PK.</li> </ul> <p>Based on the contract article 7 point 1.k. stated that the contractor able to comply to the Supply Chain requirements and able to be audited by internal and external auditor from certification body, if needed.</p>	Comply

	This requirement is not applicable to outsourced storage facilities where the management of the oil palm product(s) and instructions for tank movements are controlled by the certified organisation (not the tank farm manager).	Ukui I KCP was located in the same area with Ukui I POM, delivery of PK are conducted through conveyor belt. No contractor used for PK deliveries.	
5.5.2	Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following:	The legal ownership of all CPO and PK owned by PT Inti Indosawit Subur.	Comply
	a) The site has legal ownership of all input material to be included in outsourced processes;		
	b) The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary.	PT Inti Indosawit Subur already have contract with CV Teman Setia as the CPO and PK transporter, as evidence in "Perjanjian Pengangkutan" No.12/X/SK-IIS/2019 dated 1 Oct 2019.	Comply
	c) The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.	PT Inti Indosawit Subur – Ukui I POM has a Procedure of Traceability (AA-MPM-OP-1400.17-R7) dated 1 Oct 2019. The procedure covers the mechanism of CPO and PK delivery (Chapter B). The CPO and PK transporting also regulated in Work Instruction PUS/IK-SKP/11 as internal control for transporter to ensure compliance with company standard/requirement.  Requirement of RSPO Supply Chain Certification related outsourcing process has been mentioned in the contract that signed by the relevant contractors. Dissemination to contractor's driver has been done on 9/10/2019, attended by 13 driver.	Comply

5.5.3	The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products. 5.5.4 The site shall at its next audit inform its CB of the names and contact details of any new contractor used for the processing or physical handling of RSPO certified oil palm products.	PT Inti Indosawit Subur – Ukui I POM has record the names and contact details of the transporter, which contain in “Perjanjian Pengangkutan”.	Comply
5.5.4	The site shall at its next audit inform its CB of the names and contact details of any new contractor used for the processing or physical handling of RSPO certified oil palm products.	PT Inti Indosawit Subur aware to inform its CB regarding the name and contact detail of any new contractor prior to next assessment.	Comply
<b>5.9 Record keeping</b>			
5.9.1	The organisation shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements.	<p>Based on review of PT Inti Indosawit Subur – Ukui I POM document and record, the Mill is able to demonstrate complete, up-to-date and accessible records and reports covering all aspects of RSPO Supply Chain Certification Standard requirements.</p> <p>Records and report verified are as follows:</p> <ul style="list-style-type: none"> <li>• Laporan Harian Pabrik (Mill Daily Report); dated 30 Nov 2019;</li> <li>• Kartu Timbangan (Weighbridge Card) FFB;</li> <li>• Kartu Timbangan (Weighbridge Card) CPO;</li> <li>• Kartu Timbangan (Weighbridge Card) PK.</li> </ul> <p>Please see details in 5.4 and 5.6.</p>	Comply

5.9.2	Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.	The procedure of Traceability (AA-MPM-OP-1400.7.R7) dated 1 Oct 2019, section 6.9 requires that all records and reports related to traceability and book keeping are retained for a period of 10 years.	Comply
5.9.3	The organisation shall be able to provide the estimate volume of palm oil / palm kernel oil content (separate categories) in the RSPO certified oil palm product and keep an up to date record of the volume purchased (input) and claimed (output) over a period of twelve (12) months.	PT Inti Indosawit Subur – Ukui I POM is able to provide estimate volume of CPO and PK in a year period as in “Distribusi Produksi Bulanan Anggaran Tahun 2020” consists estimate of FFB receiving from certified source (Ukui Estate, Ukui Plasma and outside suppliers), Extraction rates, Processing capacity, working hour and utilisation.  The Mill also keep an up to date record of the FFB volume received, CPO and PK produced over a period of twelve (12) month	Comply
D.5.1	The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.	Ukui I POM uses RSPO Supply Chain model Mass Balance.  Not applicable	N/A
E.5.1	a) The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.	Based on review of PT Inti Indosawit Subur – Ukui I POM document and record, the Mill is able to demonstrate complete, up-to-date and accessible records and reports covering all aspects of RSPO Supply Chain Certification Standard requirements.  Records and report verified are as follows: <ul style="list-style-type: none"> <li>• Laporan Harian Pabrik (Mill Daily Report); dated 30 Nov 2019.</li> <li>• Mill Summary Report; November 2019.</li> <li>• Kartu Timbangan (Weighbridge Card) FFB;</li> <li>• Kartu Timbangan (Weighbridge Card) CPO;</li> <li>• Kartu Timbangan (Weighbridge Card) PK;</li> </ul> Based on Laporan Harian Pabrik dated 30 Nov 2019 , FFB received are: <ul style="list-style-type: none"> <li>• Certified: 442,98 MT</li> <li>• Non-Certified: 330.87 MT</li> </ul>	Comply

		<p>FFB received from 1 Jan 2019 to 30 Nov 2019, are:</p> <ul style="list-style-type: none"> <li>• Certified: 183,023.29 MT</li> <li>• Non-Certified: 91,088.18 MT</li> </ul> <p>CPO produced on 30 Nov 2019 are:</p> <ul style="list-style-type: none"> <li>• Certified: 100.18 MT</li> <li>• Non-Certified: 66.64 MT</li> </ul> <p>CPO produced from 1 Jan 2019 to 30 Nov 2019, are:</p> <ul style="list-style-type: none"> <li>• Certified: 37,473.91 MT</li> <li>• Non-Certified: 16,931.76 MT</li> </ul> <p>PK produced on 30 Nov 2019, are:</p> <ul style="list-style-type: none"> <li>• Certified: 23.56 MT</li> <li>• Non-Certified: 17.23 MT</li> </ul> <p>PK produced from 1 Jan 2019 to 30 Nov 2019, are:</p> <ul style="list-style-type: none"> <li>• Certified: 9,958.00 MT</li> <li>• Non-Certified: 4,978.69 MT</li> </ul> <p>CPO delivered from 1 Jan 2019 to 30 Nov 2019, are:</p> <ul style="list-style-type: none"> <li>• Certified: 38,596.00 MT</li> <li>• Non-Certified: 17,742.44 MT</li> </ul> <p>PK delivered from 1 Jan 2019 to 30 Nov 2019, are:</p> <ul style="list-style-type: none"> <li>• Certified: 9,750.43 MT</li> <li>• Non-Certified: 4,917.62 MT</li> </ul> <p>Based on Laporan Harian Pabrik dated 31 Dec 2018, end stock are:</p>	
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		<ul style="list-style-type: none"> <li>• Certified CPO: 1,262.31 MT</li> <li>• Non-Certified CPO: 1.082.07 MT</li> <li>• Certified PK: 78.29 MT</li> <li>• Non-Certified PK: 99.38 MT</li> </ul>	
	b) All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.	Conversion rate is only applied to provide reliable estimation of CPO and PK produced for annual budget. The management of PT Inti Indosawit Subur – Ukui I POM has mechanism and knowledge that all volumes of CPO and PK delivered are deducted from the material accounting system.	Comply
	c) The site can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a site is allowed to sell short. (i.e. product can be sold before it is in stock.)	PT Inti Indosawit Subur – Ukui I POM only deliver certified CPO and PK sales from a positive stock. The volume of certified CPO and PK are balanced on three-monthly basis.	Comply
<b>5.10 Conversion Factors</b>			
5.10.1	Where applicable, a conversion rate shall be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organisations may determine and set their own conversion rates which shall be based upon past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website ( <a href="http://www.rspo.org">www.rspo.org</a> ).	<p>Conversion rate is applied to provide reliable estimation of CPO and PK produced.</p> <p>Data seen:</p> <ul style="list-style-type: none"> <li>• Laporan Harian Pabrik (Mill Daily Report); dated 30 Nov 2019.</li> <li>• Laporan Bulanan Pabrik (Monthly Report); November 2018</li> </ul>	Comply
5.10.2	Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.	The actual conversion ratio is monitored on daily basis through sounding result and documented in daily report, "Laporan Harian Pabrik". PT Inti Indosawit Subur – Ukui I POM is able to demonstrate the work instruction for analysis of oil content.	Comply

		<p>Based on Laporan Harian Produksi dated 30 Nov 2019, the sounding result and production report shows that actual conversion ratios from FFB into CPO are:</p> <ul style="list-style-type: none"> <li>For FFB from Ukui Estate: 22.76%</li> <li>For FFB from Ukui Plasma: 21.39%</li> <li>For FFB from outside: 19.71%</li> </ul> <p>And actual conversion ratios from FFB into PK are:</p> <ul style="list-style-type: none"> <li>For FFB from Ukui Estate: 5.10%</li> <li>For FFB from Ukui Plasma: 5.10%</li> <li>For FFB from outside: 5.10%.</li> </ul>	
Proses sing D.6	The site shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non- certified oil palm product including during transport and storage to strive for 100% separation.	<p>Ukui I POM uses RSPO Supply Chain model Mass Balance.</p> <p>Not applicable</p>	N/A
<b>5.6 Sales and goods out</b>			
5.6.1	<p>The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form: The name and address of the buyer;</p> <ul style="list-style-type: none"> <li>The name and address of the seller;</li> <li>The loading or shipment / delivery date;</li> <li>The date on which the documents were issued;</li> <li>A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations);</li> <li>The quantity of the products delivered;</li> </ul>	<p>PT Inti Indosawit Subur – Ukui I POM has demonstrated SOP of Traceability (AA-MPM-OP-1400.7.R7), chapter 5.2 indicates the Marketing Manager issued Delivery Order (DO) with information: name and address of production unit, name and address of buyer, contract number, type of product transportation (land/sea), distance, type of product (CPO or PK, certified or non-certified), quantity of product, delivery date, product qualification specification (CPO or PK: FFA, water content, dirt), Supply chain model (Mass Balance).</p> <p>At the Mill, weighbridge operator printed out CPO or PK weighbridge card, based on DO from marketing which indicates: type of commodity, CPO or PK certified or not-certified; source and destination address; Supply Chain model: Mass Balance; Certificate number of the Mill; date of delivery, Product quality specification (moisture, FFA, dirt); Contract number/DO number; Quantity, Transport detail (driver name, vehicle number); Buyer address. During this surveillance period, Ukui I POM</p>	Nonconformity

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	<ul style="list-style-type: none"> <li>• Any related transport documentation;</li> <li>• Supply chain certificate number of the seller;</li> <li>• A unique identification number.</li> <li>• Information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation).</li> <li>• For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements / Announcements and Confirmations on the RSPO IT platform per shipment or group of shipments.</li> </ul>	<p>mostly sold certified product in form of Palm Kernel (PK) to Ukui I Kernel Crushing Plant located in the same area of Ukui I POM. There were also a few sales of RSPO certified CPO identified during this annual surveillance period.</p> <p>Sampled Delivery Order/DO:</p> <ol style="list-style-type: none"> <li>1. DO No.11015/DC10/02/19 dated 15 Nov 2019 (65.44 MT);             <ul style="list-style-type: none"> <li>○ Weighbridge Card No.PUSC119202426 dated 04/12/2019; product is CPO certified RSPO; Nett weight is 30,960 kg; SC model is Mass Balance; certificate is RSPO 633774; transporter CV Teman Setia (SP 033785); BK 8588 VO; driver Lemi Manurung; deliver to PT Sari Dumai Sejati (Lubuk Gaung, Dumai).</li> <li>○ Weighbridge Card No.PUSC119202427 dated 04/12/2019; product is CPO certified RSPO; Nett weight is 30,750 kg; SC model is Mass Balance; certificate is RSPO 633774; transporter CV Teman Setia (SP 033786); BK 8812 VO; driver Kasni Hardi; deliver to PT Sari Dumai Sejati (Lubuk Gaung, Dumai).</li> <li>○ Weighbridge Card No.PUSC119202428 dated 04/12/2019; product is CPO certified RSPO; Nett weight is 30,790 kg (based on DO 11015/DC10/02/19: 3,750 kg and DO 12011/DC10/02/19: 27,060 kg). SC model is Mass Balance; certificate is RSPO 633774; transporter CV Teman Setia (SP 033789); BK 8373 VO; driver Junaidi; deliver to PT Sari Dumai Sejati (Lubuk Gaung, Dumai).</li> </ul> </li> </ol> <p>Non-Certified:</p> <ul style="list-style-type: none"> <li>○ Weighbridge Card No.PUSC119202197 dated 02/11/2019; product is CPO Non-Certified; Nett weight is 23,260 kg (based on DO 11002/DN10/02/19. Transporter PT Sumber Kencana Inhu (SK03); BM 8824 BU; driver Saharuddin; deliver to PT Sari Dumai Sejati (Teluk Bagus, Rengat).</li> <li>○ Weighbridge Card No.PUSC119202454 dated 09/12/2019; product is CPO Non-Certified; Nett weight is 23,060 kg (based on DO 12017/DN10/02/19.</li> </ul>	
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		<p>Transporter PT Sumber Kencana Inhu (SK78A); BM 8945 BU; driver Said Dirman; deliver to PT Sari Dumai Sejati (Teluk Bagus, Rengat).</p> <p>Delivery of certified Palm Kernel from Ukui I POM to Ukui I KCP are recorded in the "Laporan Harian Pabrik" (daily report) and Delivery Form. Data verified:</p> <ul style="list-style-type: none"> <li>o "Laporan Harian Pabrik" dated 30 Nov 2019, stated that certified PK delivered on the day was 43.15 MT; non-certified was 0 (nil). Certified PK delivered in November was 707.90 MT; non-certified was 577.28 MT. Certified PK delivered until November 2019 was 9,750.43 MT; non-certified was 4,917.62 MT.</li> <li>o Delivery Form #KCP PUS 1001 SS dated 30 Nov 2019, from Ukui I POM to Ukui I KCP; commodity: RSPO certified Palm Kernel (CSPK); Supply Chain model: Mass Balance; certificate number: RSPO 635438; total amount 707.79 MT; delivery period: 1 to 30 Nov 2019.</li> </ul> <p>Information are complete and presented in across range of document, e.g. Delivery Order, Weighbridge Card, "Laporan Harian Pabrik" (Mill Daily Report), Delilvery Form, Mill Operation Summary and Book Keeping Mass Balance Report.</p> <p>PT Inti Indosawit Subur – Ukui I POM has made Shipping Announcement in RSPO IT Platform to announce sales of RSPO certified CPO or PK per group of shipments (DO). During this surveillance period Ukui 1 POM sold certified product in form of CSPO and CSPK.</p> <p>Samples seen:</p> <ul style="list-style-type: none"> <li>- Shipping Announcement, with transaction ID No. TR-29a5e44d-c770 dated 08/05/2019 for 832.09 MT of CSPK Mass Balance; from PT Inti Indosawit Subur – Ukui I Mill (RSPO_PO1000000148) as Seller to Buyer PT Inti Indosawit Subur – Ukui I KCP (RSPO_PO1000002724).</li> <li>- Shipping Announcement, with transaction ID No. TR-64a031a9-5b96 dated 19/11/2019 for 1,020.57 MT of CSPK Mass Balance; from PT Inti Indosawit Subur – Ukui I Mill (RSPO_PO1000000148) as Seller to Buyer PT Inti Indosawit Subur</li> </ul>	
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		<p>– Ukui I KCP (RSPO_PO1000002724).</p> <p>Major Non Conformity: There are discrepancy between Shipping Announcement of CSPO and CSPK in PlamTrace compare to CSPO and CSPK delivery according to monthly Book Keeping of Ukui I POM during period December 2018 to November 2019. It was indicated over sold volume of CSPO and CSPK.</p>	
<b>5.7 Registration of Transactions</b>			
5.7.1	<p>Supply chain actors who:</p> <ul style="list-style-type: none"> <li>• Are mills, traders, crushers and refineries; and</li> <li>• Take legal ownership and/or physically handle RSPO Certified Sustainable oil palm products that are available in the yield scheme of the RSPO IT Platform (Figure 2 and 3, refer Annex 1) shall register their transaction in the RSPO IT platform and confirm upon receipt where applicable.</li> </ul>	<p>PT Inti Indosawit Subur – Ukui I POM is a palm oil mill which takes legal ownership and physically handled RSPO certified sustainable oil palm product (FFB), therefore the site has been registered in RSPO IT Platform with ID number RSPO_PO1000000148.</p>	Comply
5.7.2	<p>The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform: Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement / Announcement in the RSPO IT Platform. The declaration time to do Shipping Announcement / Announcement is based on members' own standard operating procedures.</p>	<p>PT Inti Indosawit Subur – Ukui I POM has made Shipping Announcement in RSPO IT Platform to announce sales of RSPO certified CPO or PK per group of shipments (DO). During this surveillance period, Ukui I POM sold certified product in form of CSPO and CSPK.</p> <p>Samples seen:</p> <ol style="list-style-type: none"> <li>1. Shipping Announcement, with transaction ID No. TR-29a5e44d-c770 dated 08/05/2019 for 832.09 MT of CSPK Mass Balance; from PT Inti Indosawit Subur – Ukui I Mill (RSPO_PO1000000148) as Seller to Buyer PT Inti Indosawit Subur – Ukui I KCP (RSPO_PO1000002724).</li> <li>2. Shipping Announcement, with transaction ID No. TR-64a031a9-5b96 dated 19/11/2019 for 1,020.57 MT of CSPK Mass Balance; from PT Inti Indosawit Subur</li> </ol>	Comply

	<p>Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace document with a unique traceability number. Tracing can be done in a consolidated way at least annually.</p> <p>Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed.</p> <p>Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements.</p>	<p>– Ukui I Mill (RSPO_PO1000000148) as Seller to Buyer PT Inti Indosawit Subur          – Ukui I KCP (RSPO_PO1000002724).</p> <p>3. Shipping Announcement, with transaction ID No. TR-88a61ed6-7acb dated 18/09/2019 for 65.44 MT of CSPO Mass Balance; from PT Inti Indosawit Subur – Ukui I Mill (RSPO_PO1000000345) as Seller to Buyer PT Sari Dumai Sejati (RSPO-PO1000006430). Based on DO No.11015/DC10/02/19 dated 15 Nov 2019 (65.44 MT); Weighbridge Card No.PUSC119202426, PUSC119202427 and PUSC119202428 dated 04/12/2019.</p> <p>The company has done "Remove" for certified product sold as another scheme (ISCC), according to transaction ID:</p> <ol style="list-style-type: none"> <li>1. TR-0a72e23c-75b5 dated 04/12/2019; product is CSPO; program Mass Balance; available volume is 42,595.76 MT; volume remove is 3,289.68 MT; reason for removal is sold as ISCC.</li> <li>2. TR-9d7fbcfb-b507 dated 04/12/2019; product is CSPO; program Mass Balance; available volume is 39,306.08 MT; volume remove is 38,595.99 MT; reason for removal is sold as ISCC.</li> </ol>	
<b>5.11 Claims</b>			
5.11.1	<p>The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	<p>PT Inti Indosawit Subur – Ukui I POM has made claims regarding the support of RSPO certified oil palm products only through Delivery document, such as Delivery Order, Weighbridge Card and Delivery Form. By stating the RSPO certified number and the supply chain model. The organization aware about the RSPO Rules on Market Communications and Claims.</p>	Comply
<b>General corporate communications</b>			
4.1	<p>A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.</p>	<p>PT. Inti Indosawit Subur (with the brand Asian Agri), the parent company of Ukui I POM is highlighting its commitment to the principles of RSPO, and directly referring to RSPO website. The corporate communication can be found at <a href="http://www.asianagri.com">http://www.asianagri.com</a>.</p>	Comply

<p>4.2</p>	<p>In corporate communications a member is allowed to:</p> <ul style="list-style-type: none"> <li>a. Display its RSPO membership status</li> <li>b. Display the RSPO web address (www.rspo.org)</li> <li>c. State that the member supports the work of the RSPO</li> <li>d. State the member’s history with regard to the RSPO.</li> <li>e. Use the RSPO trademark to promote its membership of the RSPO.</li> </ul> <p>Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text ‘Check our progress at www.rspo.org’ where the link must lead to the member’s profile page.</p>	<p>PT. Inti Indosawit Subur (with the brand Asian Agri), in its website:</p> <ul style="list-style-type: none"> <li>a. Display its RSPO membership status: No, PT. Inti Indosawit Subur (with the brand Asian Agri), did not display its RSPO membership status. The CH only stated “In 2006, became a member of the Roundtable of Sustainable Palm Oil. We received out first RSPO certification for our estate in 2010.”</li> <li>b. Display the RSPO web address: Not in direct manner. PT. Inti Indosawit Subur (with the brand Asian Agri), made a link to RSPO website.</li> <li>c. State the member supports the work of the RSPO: Not in direct manner. In the website, PT. Inti Indosawit Subur (with the brand Asian Agri), “In 2006, became a member of the Roundtable of Sustainable Palm Oil. We received out first RSPO certification for our estate in 2010.”</li> <li>d. State the member’s history with regards to the RSPO: Not in direct manner. In the website, In the website, PT. Inti Indosawit Subur (with the brand Asian Agri), “In 2006, became a member of the Roundtable of Sustainable Palm Oil. We received out first RSPO certification for our estate in 2010, and in 2012, the certificatoin for our smallholder scheme.”</li> <li>e. Use of RSPO Trademark to promote its membership of the RSPO: No, PT. Inti Indosawit Subur (with the brand Asian Agri), did not use RSPO trademark in its corporate communication such in website.</li> </ul>	<p>Comply</p>
<p>4.3</p>	<p>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.</p>	<p>No, PT. Inti Indosawit Subur (with the brand Asian Agri), did not display its RSPO membership status.  It is clear that the statement did not lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.</p>	<p>Comply</p>
<p>4.4</p>	<p>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.</p>	<p>No, PT. Inti Indosawit Subur (with the brand Asian Agri), did not display its RSPO membership status.  It is clear that the statement are clear and did not mislead consumers or other stakeholders as to the certified content of oil palm products in the PT. Inti Indosawit Subur – Ukui I POM own products.</p>	<p>Comply</p>



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4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	No, PT. Inti Indosawit Subur (with the brand Asian Agri) did not display its RSPO Corporate Logo in any document.	Comply
<b>Business to business communications</b>			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	There was no use of RSPO trademark and/or RSPO corporate logo in business to business communication related to RSPO certified product; between PT. Inti Indosawit Subur – Ukui I POM and their buyers.	Comply
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	When confirming the sales of certified oil palm products, PT. Inti Indosawit Subur – Ukui I POM followed the requirements of the RSPO SCCS. PT. Inti Indosawit Subur – Ukui I POM stating the supply chain model and certificate number under which the claim is being made.	Comply
5.3	Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options:  f. 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	PT. Inti Indosawit Subur – Ukui I POM is not a distributor and/or wholesaler. Not applicable.	N/A



	evidence either through on-pack claims or documentation. g. 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. Inti Indosawit Subur – Ukui I POM is not producing or selling end-product to consumer. No labelling on product whatsoever. Not applicable.	N/A
<b>Business to consumer communication</b>			
6.1	Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as 'product-specific' claims. Product-specific claims are voluntary.	PT. Inti Indosawit Subur – Ukui I POM is producing and selling CSPO and CSPK; and not making a business to consumer communication. Not applicable.	N/A
6.2	Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception	PT. Inti Indosawit Subur – Ukui I POM is not using RSPO trademark and/or RSPO label. PT. Inti Indosawit Subur – Ukui I POM is producing and selling CSPO and CSPK; and not making a business to consumer communication. Not applicable.	N/A

	of RSPO Credits and of retailers in accordance with 6.8 below.		
6.3	When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.	PT. Inti Indosawit Subur – Ukui I POM is not using RSPO-certified on-pack claim. PT. Inti Indosawit Subur – Ukui I POM is producing and selling CSPO and CSPK; and not making a business to consumer communication. Not applicable.	N/A
6.4	Business to consumer communication shall not include information about the claimant’s RSPO membership status.	PT. Inti Indosawit Subur – Ukui I POM is not making any claim related to their RSPO membership status. PT. Inti Indosawit Subur – Ukui I POM is producing and selling CSPO and CSPK; and not making a business to consumer communication. Not applicable.	N/A
6.5	Members shall not communicate to consumers information about their suppliers’ RSPO membership status.	PT. Inti Indosawit Subur – Ukui I POM is not making any information about their supplier’s RSPO membership status. PT. Inti Indosawit Subur – Ukui I POM is producing and selling CSPO and CSPK; and not making a business to consumer communication. Not applicable.	N/A
6.6	Use of the RSPO trademark is restricted to claims about RSPO-certified sustainable palm oil products and it is not authorised for use in relation to any other ingredient.	PT. Inti Indosawit Subur – Ukui I POM is not using RSPO trademark and/or RSPO label. Not applicable.	N/A
6.7	Use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorised product-specific claim.	PT. Inti Indosawit Subur – Ukui I POM is not using RSPO trademark and/or RSPO label. Not applicable.	N/A
6.8	RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be undertaken	PT. Inti Indosawit Subur – Ukui I POM is retailers or food service company. Not applicable.	N/A

	<p>via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules applying to RSPO supply chain certified members. The guidance document for audits is available on <a href="http://www.rspo.org">www.rspo.org</a>.</p>		
<p><b>Principle 4: Respect community and human rights and deliver benefit</b>          Respect community rights, provide equal opportunities, maximise benefits from engagement and ensure remediation where needed.</p>			
<p><b>Criteria 4.1</b>          The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.</p>			
4.1.1	<p><b>(C)</b> A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, supply chain and local communities and prohibits intimidation and harassment by the</p>	<p>The Company already has a Policy to respect human rights as outlined in the Corporate Policy issued by the Managing Director of Asian Agri on 1 December 2014. Point 13 of the policy states that "<i>The Company respects human rights by treating all employees fairly, in recruitment, performance assessment, conditions and work environment and representation irrespective of tribe, caste, nationality, religion, disability, gender, sexual orientation, union membership, political affiliation and/or age</i>".</p>	<p>Non conformity</p>

	unit of certification and contracted services, including contracted security forces.	Major Non-Conformity: The Company already has a Policy to respect human rights as outlined in the Corporate Policy issued by the Managing Director of Asian Agri on 1 December 2014, especially at Point 13. However the policy does not mentioned about prohibiting retaliation against Human Rights Defenders (HRD), prohibits intimidation and harassment by the unit of certification and contracted services.	
4.1.2	The unit of certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations.	Based on interview to all level of workers, contractors, scheme smallholders and stakeholders, confirm that the unit of certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations.	Comply
<b>Criteria 4.2</b>			
There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.			
4.2.1	<b>(C)</b> The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.	Unit of Certification has mutually agreed system resolves disputes is in effective, timely and appropriate manner are within "SOP Penanganan Keluhan dari Eksternal No.AA-GL-5005-R0 01" explains mechanism to resolve external complaint. The procedure covers land dispute handling mechanism, negotiation process, and verification upon legal ownership evidence up to land compensation. Should negotiation process fails, any land dispute will be processed through legal/litigation mechanism. However, disputes system which developed by unit of certification is not follows the RSPO policy on respect for Human Right Defender (HRD). In example: <ul style="list-style-type: none"> <li>- Company Policy related to respect for Human Right Defender (HRD) without risk of reprisal or intimidation is not approved.</li> <li>- SOP Penanganan Keluhan Masyarakat No: AA-GL-510.1-R0, dated 1 January 2013 was not refer to policy on respect for HRD.</li> </ul>	Non conformity

<p>4.2.2</p>	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p>	<p>Unit of Certification established mechanism to handle complaint and grievances, within the procedures:</p> <ul style="list-style-type: none"> <li>- "SOP Penanganan Keluhan dari Eksternal No.AA-GL-5005-R0 01" explains mechanism to resolve external complaint;</li> <li>- "SOP Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan No.AA-HR-308 0.5R0" related to internal grievance mechanism for employee.</li> <li>- <b>SOP Penanganan Keluhan Masyarakat No: AA-GL-510.1-R0, dated 1 January 2013.</b></li> </ul> <p>4.1 Reporting Public Complaints</p> <p>4.1.1 General Scope: "Procedures ... for handling complaints from Concerned Parties including organizations, people, groups or institutions ...". In order for the Company to respond appropriately to the Parties' complaints in order to be identified, anonymous questions or complaints (without identity / cannot be traced by their identity) cannot be accepted. "</p> <p>4.2 Procedure for Handling / Resolving Community Complaints</p> <p>4.2.5 "This form identifies the person or organization that submitted the complaint, along with the basis of the complaint and the background of the acknowledgment (detailed description of the incident, name of the Party involved, the specific time when the event was the reason for the complaint and the basis of the complaint) .</p> <p>4.2.12 "... The company will endeavor to resolve complaints within 15 working days".</p>	<p>Comply</p>
<p>4.2.3</p>	<p>The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.</p>	<p>Based on interview with relevant stakeholders during surveillance audit, there is no grievance or conflict raised against unit of certification both company and smallholders.</p>	<p>Comply</p>

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.	Based on interview with relevant stakeholders during surveillance audit, there is no grievance or conflict raised against unit of certification both company and smallholders.	Comply
<b>Criteria 4.3</b> The unit of certification contributes to local sustainable development as agreed by local communities.			
4.3.1	Contributions to community development that are based on the results of consultation with local communities are demonstrated.	<p>In 2019 period, the company has established CSR program is recorded on CSR Project Tracking 2019, consisting 6 types of activities, such as Social, Economy, Education, Health, Infrastructure and Environment.</p> <p>The creation of the CSR program is done by coordinating with the local village head through the SIA report and monitoring. (see 3.4)</p> <p>CSR program have been implemented in 2019 for example:</p> <ol style="list-style-type: none"> <li>1. Social aspects:           <ul style="list-style-type: none"> <li>• Assistance to poors/orphans in Bukit Jaya Village, Kampung Baru, Silikuan Hulu, Sei Beras, Rice Mekar, Air Putih, etc.</li> <li>• Religious activity; do Ramadan safaris in Bukit Jaya Village, Kampung Baru, Silikuan Hulu, Sei Beras-Rice, Pontian Mekar, Air Putih, etc.</li> </ul> </li> <li>2. Economi aspects:           <ul style="list-style-type: none"> <li>• Providing palm oil seedlings for the community of Independent Palm Village for area of 2.7 hectares.</li> <li>• Assistance for cattle rolling in SP-5 Ukui-2 Village</li> </ul> </li> <li>3. Education aspects:           <ul style="list-style-type: none"> <li>• Providing equipment support for elementary schools in Ukui Village 2</li> </ul> </li> </ol>	Comply

		<p>4. Health care aspects:</p> <ul style="list-style-type: none"> <li>• Providing free medical check-up and medical assistance in Silikuan Hulu Village</li> <li>• Conducting health and nutrition checks for toddlers in Silikuan Hulu Village</li> </ul> <p>5. Infrastructure aspects:</p> <ul style="list-style-type: none"> <li>• Repairing roads in the 8 km Bagan Limau Village by using heavy equipment</li> <li>• Repairing road in the village of Air Hitam along 5 KM by using heavy equipment</li> <li>• Repairing the road in the village of Lubuk Kembang Bungo along the 5 Km by using heavy equipment</li> <li>• Providing heavy equipment and material assistance to repair concrete bridges in Lubuk Kembang Sari Village</li> <li>• Providing assistance for the construction of a Customary Hall in Ukui-2 Village</li> <li>• Providing material assistance in building halls in the village of Ukui-2</li> </ul> <p>Realization of CSR Year 2019 Program:</p> <ul style="list-style-type: none"> <li>• May 16, 2019; giving aid of 20 sacks of rice (@ 5 kg), 2 units of emergency lights, 1 unit of prayer mat to Pangkajang Village and 1 unit of fan to each of Lubuk Kembang Sari and Air Village.</li> <li>• On July 1, 2019, provided a financial aid package for schoolchildren amounting to IDR 15,000,000 to schoolchildren in Ukui Village 2.</li> <li>• On 31 August 2019, assistance for free health screening activities to 120 people in the village of Silikuan Hulu.</li> <li>• On 12 June 2019, provided additional food assistance in the Silikuan Hulu Village.</li> </ul>	
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		On 15 March 2019, provided assistance to build a small mosque in Lubuk Kembang Sari Village, including materials in the form of: 20-sheet boards, 1.5 cubic broti wood and 1 kodi zinc.																									
<b>Criteria 4.4</b>																											
Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.																											
4.4.1	(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents related to the history of land tenure and the actual legal or customary use of the land are available.	<p><b>Ukui Estate:</b>  Documents showing legal ownership of Ukui I POM and its supply bases are shown in place. Legal ownership of land use rights in Indonesia is recognize as "Hak Guna Usaha" or Land Title. Where the Land Title issued by National Land Department. The legal land use-rights for this scope as follow:</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>Area (Ha)*</th> <th>Land Title</th> </tr> </thead> <tbody> <tr> <td>Ukui</td> <td>3,565</td> <td>SK Ka. BPN No: 156/HGU/BPN/2004, dated 11 November 2004.</td> </tr> <tr> <td>KUD Sumber Makmur</td> <td>1,562</td> <td>SHM</td> </tr> <tr> <td>KUD Bina Usaha Baru</td> <td>616</td> <td>SHM</td> </tr> <tr> <td>KUD Bakti</td> <td>448</td> <td>SHM</td> </tr> <tr> <td>KUD Karya Bersama</td> <td>864</td> <td>SHM</td> </tr> <tr> <td>KUD Sawit Subur</td> <td>908</td> <td>SHM</td> </tr> <tr> <td>KUD Bina Sejahtera</td> <td>1,236</td> <td>SHM</td> </tr> </tbody> </table>	Estate	Area (Ha)*	Land Title	Ukui	3,565	SK Ka. BPN No: 156/HGU/BPN/2004, dated 11 November 2004.	KUD Sumber Makmur	1,562	SHM	KUD Bina Usaha Baru	616	SHM	KUD Bakti	448	SHM	KUD Karya Bersama	864	SHM	KUD Sawit Subur	908	SHM	KUD Bina Sejahtera	1,236	SHM	Comply
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		<p>* based on Area Statement November 2019.</p> <p>Progress of extending HGU Certificate No. 00001/1989:</p> <p><b>March 27, 2019</b> Research / Constellation Application, in the Context of Registration for Extension of HGU Period, Number: 203 / MB-RH2 / EXT.II / 2019, dated March 27, 2019. The letter was delivered from PT. IIS to the Head of Regional Office of the Ministry of ATR / BPN Prov. Riau, related to the extension of HGU No. 00001 of 1989 (6,727.64 Ha).</p> <p><b>April 23, 2019</b> Letter from PT. IIS to the Head of the Pelalawan Regency Land Office, concerning Application for Land Registration Certificate, Number: 022 / GL-RO2 / EXT / IV / 2019.</p> <p><b>September 16, 2019</b> Certificate of Number: 35/2019, explains that: A piece of land area of 6,726,255 Ha with NIB: 05.16.00.00.00007. Based on the Land Registration Document at the District Land Office. Pelalawan, the plot has been issued with a certificate with, On behalf of: PT. Inti Indosawit Subur Type and Right Number: Right to Cultivate: 00001 Area: 6,726,255 Ha.</p>														

		<p>Note: Based on the Decree of the Head of BPN No. 156 / HGU / BPN / 2004 dated 11-11-2004.</p> <p>a. The right to cultivate has been extended for a period of 25 years from 31-12-2019 (HGU No.1 / Ukui), and registration for the extension of the HGU period can only be carried out within a period of 2 years before the termination of rights.</p> <p>b. This right to operate has been renewed for a period of 35 years since the end of the extension of the term for the right to use the land, that is, the registration for renewal can only be carried out within a period of 2 years before the extension of the term of the rights expires</p> <p>Reason reducing area is High Voltage Electricity (SUTET).</p> <p><b>Plasma UKUI (Smallholder Scheme):</b> The Smallholder Manager has established mechanism for communication and consultation "Mekanisme Komunikasi dan Konsultasi" dated 16 January 2017, shaped flow Chart that describes the process of incoming information requests up to the responses provided. Each smallholder member has "Buku Panduan dan Catatan Petani Plasma", whereas explains the flow process of communication. Both of communication by written or verbal communication to group management are acceptable. For internal communication, The Smallholder Manager has prepared the procedure on "Komunikasi Internal Group Sertifikasi". SOP No. 007/DOK/SOP/PT IIS KLU-AA/2016 dated 26 November 2016. The SOP describes the relevant internal communication mechanisms of Group members, Extension Officers, Smallholder Manager and Group Managers. The Group Manager is responsible for responding to the Group's internal communications.</p> <p>Based on interview with sample of smallholders in KUD Usaha Tani, KUD Trani Maju and Mekar Abadi, there is no dispute raise to the company.</p>	
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<p>4.4.2</p>	<p>Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:</p> <p>4.4.2a Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making</p>	<p>In 2017, Unit of Certification makes new road for CPO transportation through the village area. Prior compensation land made, the unit of certification implementing FPIC mechanism and giving their consent before operate the project.</p> <p>Sample of Compensation Document for CPO Road:</p> <p>Agreement on the Transfer of Land Tenure and Relinquishment of Land Rights with Compensation for the Making of PT. IIS (No. 03 / SPJ / LEG-IIS / XII / 2016, dated 27 December 2016.</p> <p>First Party: PT. IIS</p> <p>Second Party: total 23 landowners, area 96.42 Ha</p> <ol style="list-style-type: none"> <li>1. Ramli, Ukui Dua Village, Kec. Ukui. (land owner). Size: 9m (width) x 39m (length).</li> <li>2. Mrs. Rosmida, Ukui Dua Village, Kec. Ukui. (wife of land owner). Size: 6m (width) x 5m (length).</li> <li>3. Mr. Idas, Farmers / Planters. Size: 9m (width) x 69m (length).</li> <li>4. Mr. Atan K., Farmer / Planter, Ukui Dua Village. Size: 5m (width) x 177m (length).</li> <li>5. Mr. M. Taher D, Farmer / Planter, Ukui Dua Village. Size: 8m (width) x 111m (length).</li> </ol> <p>These agreement stamped by 23 landowners and known by witnesses, among others: HUMAS RO, Plasma Manager, Manager of Ukui Farm, HUMAS Kebun Ukui, Head of Ukui Dua Village and Ukui Sub-District Head.</p>	<p>Comply</p>
	<p>4.4.2b Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken</p>	<p>PT. Inti Indosawit Subur is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. The land status is clear and no land disputes raised. Copies of documents evidencing agreement-making processes and negotiated agreement detailing the FPIC process are obsolete.</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>PT. Inti Indosawit Subur is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. The land status is clear and no land disputes raised. Copies of documents evidencing agreement-making processes and negotiated agreement detailing the FPIC process are obsolete.</p>	
<p>4.4.3</p>	<p><b>(C)</b> Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).</p>	<p><b>Ukui Estate:</b>  Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are available within HGU map namely "Peta Gambar Situasi Khusus". This map is attached within HGU certificate.</p> <p><b>Ukui Smallholders:</b>  Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are available within Certificate of Land Ownership or "Sertipikat Hak Milik" in each smallholders.</p>	<p>Comply</p>
<p>4.4.4</p>	<p>All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.</p>	<p><b>Ukui Estate:</b>  PT Inti Indosawit Subur – Ukui Group is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main Estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Soga Estate and Sei Lala Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p><b>Plasma UKUI (Smallholder Scheme):</b>  During field observation and interview with sample of smallholders at KUD Sumber Bahagia, KUD Karya Bersama and KUD Usaha Baru, there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based</p>	<p>Comply</p>

		on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights	
4.4.5	<b>(C)</b> Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.	PT. Inti Indosawit Subur is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. The land status is clear and no land disputes raised. Copies of documents evidencing agreement-making processes and negotiated agreement detailing the FPIC process are obsolete.	Comply
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.	PT. Inti Indosawit Subur is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. The land status is clear and no land disputes raised. Copies of documents evidencing agreement-making processes and negotiated agreement detailing the FPIC process are obsolete.	Comply
<b>Criteria 4.5</b> No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.			
4.5.1	<b>(C)</b> Documents showing identification and assessment of demonstrable legal, customary and user rights are available.	<b>Ukui Estate:</b> Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation was made. Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main Estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Ukui Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.  <b>Plasma UKUI (Smallholder Scheme):</b> During field observation and interview with sample of smallholders at KUD Sumber Bahagia, KUD Karya Bersama and KUD Usaha Baru, there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based	Comply

		<p>on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights.</p> <p>There is no new planting occurred within this scope.</p>	
4.5.2	<p><b>(C)</b> FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.</p>	<p><b>Ukui Estate:</b></p> <p>Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation with through FPIC mechanism was made.</p> <p>Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main Estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Ukui Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p><b>Plasma UKUI (Smallholder Scheme):</b></p> <p>During field observation and interview with sample of smallholders at KUD Sumber Bahagia, KUD Karya Bersama and KUD Usaha Baru, there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights</p>	Comply
4.5.3	<p>Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples.</p>	<p><b>Ukui Estate:</b></p> <p>Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation with through FPIC mechanism was made.</p> <p>Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main Estate roads. This was confirmed</p>	Comply

	<p>Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p>	<p>during interview with company representative and stakeholder consultation with local community. Based on Ukui Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p><b>Plasma UKUI (Smallholder Scheme):</b> During field observation and interview with sample of smallholders at KUD Sumber Bahagia, KUD Karya Bersama and KUD Usaha Baru, there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights</p>	
<p>4.5.4</p>	<p>To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.</p>	<p><b>Ukui Estate:</b> Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation with through FPIC mechanism was made.</p> <p>Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main Estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Ukui Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p><b>Plasma UKUI (Smallholder Scheme):</b> During field observation and interview with sample of smallholders at KUD Sumber Bahagia, KUD Karya Bersama and KUD Usaha Baru, there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights</p>	<p>Comply</p>

<p>4.5.5</p>	<p>Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.</p>	<p><b>Ukui Estate:</b>  Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation with through FPIC mechanism was made.   Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main Estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Ukui Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p><b>Plasma UKUI (Smallholder Scheme):</b>  During field observation and interview with sample of smallholders at KUD Sumber Bahagia, KUD Karya Bersama and KUD Usaha Baru, there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights</p>	<p>Comply</p>
<p>4.5.6</p>	<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><b>Ukui Estate:</b>  Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation with through FPIC mechanism was made.   Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main Estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Ukui Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p>	<p>Comply</p>



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4.5.7	<p>New lands will not be acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations in the national interest without consent (eminent domain), except in cases of smallholders benefitting from agrarian reform or anti-drug programmes.</p>	<p><b>Ukui Estate:</b></p> <p>Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation with through FPIC mechanism was made.</p> <p>Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main Estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Ukui Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p><b>Plasma UKUI (Smallholder Scheme):</b></p> <p>During field observation and interview with sample of smallholders at KUD Sumber Bahagia, KUD Karya Bersama and KUD Usaha Baru, there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights</p>	Comply
4.5.8	<p><b>(C)</b> New lands are not acquired in areas inhabited by communities in voluntary isolation.</p>	<p><b>Ukui Estate:</b></p> <p>Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation with through FPIC mechanism was made.</p>	Comply

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<p><b>Criteria 4.6</b>          Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.</p>			
4.6.1	<p><b>(C)</b> A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.</p>	<p><b>Ukui Estate:</b>          Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation with through FPIC mechanism was made.</p> <p>Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main Estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Ukui Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p><b>Plasma UKUI (Smallholder Scheme):</b></p>	Comply

		During field observation and interview with sample of smallholders at KUD Sumber Bahagia, KUD Karya Bersama and KUD Usaha Baru, there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights	
4.6.2	<b>(C)</b> A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.	<p><b>Ukui Estate:</b></p> <p>Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation with through FPIC mechanism was made.</p> <p>Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main Estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Ukui Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p><b>Plasma UKUI (Smallholder Scheme):</b></p> <p>During field observation and interview with sample of smallholders at KUD Sumber Bahagia, KUD Karya Bersama and KUD Usaha Baru, there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights</p>	Comply
4.6.3	Evidence is available that equal opportunities are provided to both men and women to hold land titles for small holdings.	<p><b>Ukui Estate:</b></p> <p>Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation with through FPIC mechanism was made.</p>	Comply

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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 publicly available to them.</p>	<p><b>Ukui Estate:</b>          Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation with through FPIC mechanism was made.</p> <p>Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main Estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Ukui Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p><b>Plasma UKUI (Smallholder Scheme):</b>          During field observation and interview with sample of smallholders at KUD Sumber Bahagia, KUD Karya Bersama and KUD Usaha Baru, there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights</p>	Comply

<b>Criteria 4.7</b>			
Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.			
4.7.1	<p><b>(C)</b> A mutually agreed procedure for identifying people entitled to compensation is in place.</p>	<p><b>Ukui Estate:</b></p> <p>Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation with through FPIC mechanism was made.</p> <p>Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main Estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Ukui Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p><b>Plasma UKUI (Smallholder Scheme):</b></p> <p>During field observation and interview with sample of smallholders at KUD Sumber Bahagia, KUD Karya Bersama and KUD Usaha Baru, there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights</p>	Comply
4.7.2	<p><b>(C)</b> A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.</p>	<p><b>Ukui Estate:</b></p> <p>Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation with through FPIC mechanism was made.</p> <p>Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main Estate roads. This was confirmed during interview with company representative and stakeholder consultation with local</p>	Comply

		<p>community. Based on Ukui Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p><b>Plasma UKUI (Smallholder Scheme):</b>          During field observation and interview with sample of smallholders at KUD Sumber Bahagia, KUD Karya Bersama and KUD Usaha Baru, there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights</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><b>Ukui Estate:</b>          Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation with through FPIC mechanism was made.</p> <p>Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main Estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Ukui Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p><b>Plasma UKUI (Smallholder Scheme):</b>          During field observation and interview with sample of smallholders at KUD Sumber Bahagia, KUD Karya Bersama and KUD Usaha Baru, there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights</p>	Comply
<p><b>Criteria 4.8</b>          The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrated that they have legal customary, or user rights.</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><b>Ukui Estate:</b></p> <p>Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation with through FPIC mechanism was made.</p> <p>Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main Estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Ukui Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p><b>Plasma UKUI (Smallholder Scheme):</b></p> <p>During field observation and interview with sample of smallholders at KUD Sumber Bahagia, KUD Karya Bersama and KUD Usaha Baru, there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights.</p>	<p>Comply</p>
<p>4.8.2</p>	<p><b>(C)</b> Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.</p>	<p><b>Ukui Estate:</b></p> <p>Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation with through FPIC mechanism was made.</p> <p>Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main Estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Ukui Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p>	<p>Comply</p>

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4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use right, there claims will be settled using the relevant requirements (Indicator 4.4.2, 4.4.3 and 4.4.4)	<p><b>Ukui Estate:</b></p> <p>Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation with through FPIC mechanism was made.</p> <p>Also, there is not acquired any new land for oil palm plantation. The company does not restrict local peoples access through the main Estate roads. This was confirmed during interview with company representative and stakeholder consultation with local community. Based on Ukui Estate area statement documents, interview with communities and stakeholder consultation, there is no land conflict noted and/or reported between company and surrounding communities.</p> <p><b>Plasma UKUI (Smallholder Scheme):</b></p> <p>During field observation and interview with sample of smallholders at KUD Sumber Bahagia, KUD Karya Bersama and KUD Usaha Baru, there is no land dispute within smallholders area since the plantation developed. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights.</p>	Comply
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in participatory way with involvement of affected parties (including neighbouring communities where applicable)	<p><b>Ukui Estate:</b></p> <p>Unit of Certification is long-established plantation with planting year since 1990, land use-rights already obtained since 1989. This company is one of pilot project by national government, therefore the existing area is origin from State Land and no land compensation with through FPIC mechanism was made.</p>	Comply



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<p><b>Principle 5: Support smallholder inclusion</b>          Include smallholders in RSPO supply chains and improve their livelihoods through fair and transparent partnerships.</p>													
<p><b>Criteria 5.1</b>          The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.</p>													
5.1.1	<p>Current and previous period prices paid for FFB are publicly available and accessible by smallholders.</p>	<p>FFB price for Scheme Smallholders are based on "Hasil Penetapan Harga TBS Kelapa Sawit Provinsi Riau" issued by FFB pricing team of Riau Province. It was available FFB price letter No.47/TPH TBS-XII/2019 dated 3 Dec 2019 for period 4 – 10 Dec 2019.</p> <p>The price are:</p> <table border="1" data-bbox="898 1118 1263 1377"> <thead> <tr> <th>Oil palm age (year)</th> <th>FFB price (Rp/kg)</th> </tr> </thead> <tbody> <tr> <td>3</td> <td>1,337.63</td> </tr> <tr> <td>4</td> <td>1,448.84</td> </tr> <tr> <td>5</td> <td>1,583.39</td> </tr> <tr> <td>6</td> <td>1,621.40</td> </tr> </tbody> </table>	Oil palm age (year)	FFB price (Rp/kg)	3	1,337.63	4	1,448.84	5	1,583.39	6	1,621.40	Comply
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5.1.2	<b>(C)</b> Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.	KUD get the information of FFB price from "Tim Penetapan Harga TBS" (FFB pricing team of Riau Province). The company can demonstrated minutes of agreed FFB price, "Berita Acara Kesepakatan Harga TBS Petani Plasma" between the company and KUDs.	Comply																		
5.1.3	<b>(C)</b> Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.	The company can demonstrated minutes of agreed FFB price, "Berita Acara Kesepakatan Harga TBS Petani Plasma" between the company and KUDs. FFB price for period 4 – 10 Dec 2019 are in accordance with FFB price from "Tim Penetapan Harga TBS" No.47/TPH TBS-XII/2019 dated 3 Dec 2019.	Comply																		
5.1.4	<b>(C)</b> Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These	The agreement/contract documents between the company and the smallholder was acknowledged by both parties. The contract contained all relevant information such as payment method, work requirements, force majeure, contract period, cancellation of contract. All parties, including women and independent representative are involved	Comply																		

	include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.	<p>in decision-making processes and understand the contracts. Representation of women are evident, as follows:</p> <table border="1"> <thead> <tr> <th>Plot</th> <th>Name</th> <th>Area (Ha)</th> <th>GPS coordinat</th> </tr> </thead> <tbody> <tr> <td>312-027</td> <td>Wiji Ningsih</td> <td>1.84</td> <td>0° 8' 1.387" S 102° 4' 14.123 E</td> </tr> <tr> <td>312-031</td> <td>Saunah</td> <td>2.98</td> <td>0° 8' 8.299" S 102° 4' 14.634 E</td> </tr> <tr> <td>312-040</td> <td>Miftahusalima</td> <td>1.8</td> <td>0° 8' 15.794 102° 5 6.912</td> </tr> <tr> <td>313-109</td> <td>Siti Salamah</td> <td>2.26</td> <td>0° 9' 5.168" 102° 4' 51.685"</td> </tr> </tbody> </table>	Plot	Name	Area (Ha)	GPS coordinat	312-027	Wiji Ningsih	1.84	0° 8' 1.387" S 102° 4' 14.123 E	312-031	Saunah	2.98	0° 8' 8.299" S 102° 4' 14.634 E	312-040	Miftahusalima	1.8	0° 8' 15.794 102° 5 6.912	313-109	Siti Salamah	2.26	0° 9' 5.168" 102° 4' 51.685"	
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5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe.	Contracts are fair, legal and transparent and have an agreed timeframe, as seen in indicator 2.2.2.	Comply																				
5.1.6	<b>(C)</b> Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.	<p>Payments are made in timely manner and receipts specifying price, weight, deductions and amount paid are available.</p> <p>Sample seen:            Calculation and Payment of FFB            Farmer Group No.14; Dana Bakti; KUD Karya Bersama            Period: Oct 2019</p>	Comply																				

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

	FFB received (21 - 24 Sep 2019)	=	-	kg	X	1,251.39	=	-
	FFB received (25 Sep - 1 Oct 2019)	=	19,257	kg	X	1,281.26	=	24,673,224
	FFB received (2 - 8 Oct 2019)	=	16,526	kg	X	1,254.47	=	20,731,371
	FFB received (9 - 15 Oct 2019)	=	17,046	kg	X	1,259.81	=	21,474,721
	FFB received (16 - 20 Oct 2019)	=	-	kg	X	1,283.24	=	-
	<b>Total</b>	=	<b>52,829</b>	<b>kg</b>				<b>66,879,316</b>
	<b>Deduction</b>							
	KUD deduction+ Idapertabun (20 kk)	=						17,133,074
	Aspekpir Fund	=						26,415
	Duty stamp							6,000
	JIn Poros Plasma SKP.II (Rp.6/kg)	=						316,974
	<b>Total Deduction</b>	=						<b>17,482,463</b>
	<b>Amount Received</b>	=						<b>49,396,853</b>
	Calculation and Payment of FFB Farmer Group No.209; Sumber Karya; KUD Trani Maju Period: Oct 2019							

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

		<p>FFB received (21 - 24 Sep 2019) = - kg X 1,251.39 = -</p> <p>FFB received (25 Sep - 1 Oct 2019) = 31,814 kg X 1,281.26 = 40,762,006</p> <p>FFB received (2 - 8 Oct 2019) = - kg X 1,254.47 = -</p> <p>FFB received (9 - 15 Oct 2019) = 27,843 kg X 1,259.81 = 35,076,890</p> <p>FFB received (16 - 20 Oct 2019) = 26,375 kg X 1,283.24 = 33,845,455</p> <p style="text-align: right;">Total = 86,032 kg <b>109,684,350</b></p> <p>Deduction</p> <p>KUD deduction+ Idapertabun (23 kk) = 15,681,086</p> <p>Aspekpir Fund = 43,016</p> <p>Duty stamp = 6,000</p> <p>Jln Poros Plasma SKP.II (Rp.6/kg) = 516,192</p> <p style="text-align: right;">Total Deduction = <b>16,246,294</b></p> <p style="text-align: right;">Amount Received = <b>93,438,056</b></p>	
5.1.7	Weighing equipment is verified by an independent third party on a regular basis (this can be government).	<p>Weighbridge in Ukui I POM is verified by government agency in annual basis. Latest verification was performed on 14 October 2019, based on "Surat Keterangan Hasil Pemeriksaan" (calibration certificate):</p> <ul style="list-style-type: none"> <li>- No.510.3/UPTMET/SKHP-MASSA/2019/114 for Avery Weigh Tronix; model ZM510; S/N 184350013; capacity 50,000 kg.</li> <li>- No.510.3/UPTMET/SKHP-MASSA/2019/115 for Avery Weigh Tronix; model E1205; S/N 074750282; capacity 50,000 kg.</li> </ul> <p>Certificates issued by "UPT Metrologi Legal – Dinas Koperasi Usaha Kecil dan Menengah, Perindustrian dan Perdagangan Kabupaten Pelalawan", valid until 6 October 2020.</p>	Comply
5.1.8	The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the	Based on review of agreement, the company carried out the development and provide supervision in KUD (Scheme Smallholder). The company support KUD in form of supervision in upkeep, fertilizer application, harvesting, FFB transport and implementation of RSPO P&C requirements.	Comply

	certificates, and who holds and sells the certified material.	For independent Smallholder, support are given in form of CSV (Create Share Value). Member of CSV which have cooperation with the company are Sutarno Kudin, Haluga, Samsuwar, Budi and Suhono. Form of support is the company give coaching to the independent smallholder related good agriculture practices, organisation and administration. Those independent smallholders expected to be certified in next few years.	
5.1.9	<b>(C)</b> The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.	The company has established mechanism for handling grievance from external party as in "Mekanisme Penanganan Keluhan Stakeholder" dated 22 Apr 2019. Smallholders are include as external in the mechanism.  The company has also provide channel to report to report if there is violation to the principles and objectives, through email <a href="mailto:whistleblow@rgei.com">whistleblow@rgei.com</a> or phone (62) 81 2755 2528.	Comply
<b>Criteria 5.2</b>			
The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification.	PT Inti Indosawit Subur – Ukui I POM and scheme smallholders has shown the effort to assess the interested smallholders needs for support to improve their livelihoods and their interest in RSPO certification, e.g:  Record on socialization, training and preparing the implementation RSPO PnC on interested smallholders, was conducted on 3 <sup>rd</sup> August 2019, location in Club House Kebun Ukui and attended by 70 participants of smallholder members.  The agenda such as:  <ul style="list-style-type: none"> <li>- Preparation of smallholders on implementation the RSPO PnC 2018</li> <li>- Awareness the steps of RSPO certification for PnC 2018</li> <li>- Refreshment training of Internal Control System (ICS), establish the organization structure of Group Manager and their job description</li> <li>- Preparing the strategic, planning and due date to address the RSPO PnC requirements</li> </ul>	Comply

5.2.2	The unit of certification develops and implements livelihood improvement programmes, including at least capacity building to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder).	PT Inti Indosawit Subur – Ukui I POM has develop and implement livelihood improvement programmes of Smallholders in surrounding communities..	Comply
<p><b>PROCEDURAL NOTE:</b>          The RSPO is currently developing a separate standard for Independent Smallholders.</p>			
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	<p>Ukui I Mill supplied by own estates (Ukui Estate), smallholder from 9 <i>KUD's</i> with total 3,914 smallholders and third parties supplier. Based on interview with smallholder representatives from <i>KUD Usaha Tani, Trani Maju and Mekar Abadi</i> obtain information that entire land has been granted by government (private land title/SHM).</p> <p>According to the signboard in mill's gate, Ukui I POM does not accept FFB from illegal sources (forest area or crop stolen). All FFB from third parties shall comply with regulation. Mill's staff told that FFB Purchasing Department has set the procedures for their supplier as follows:</p> <ul style="list-style-type: none"> <li>• New supplier shall proposed their FFB purchased offer including submitted the name and land legality of each potential farmer.</li> <li>• FFB Purchasing Department verify the geolocation of potential farmer that submitted by the third parties.</li> <li>• New supplier shall signed the agreement which stated to not send illegal FFB sources. This agreement will automatically cancelled if any violation on this clause.</li> <li>• The FFB transporter shall signed the zero illegal FFB statement letter in security gate in each delivery note.</li> </ul>	Comply

		<p>Based on interview with smallholder representatives from <i>KUD Sumber Makmur, Bina Usaha Baru, Bakti, Karya Bersama, Sawit Subur, Bina Sejahtera, Sumber Bahagia, Bukit Potalo and Usaha Baru</i> obtain information that entire land has been granted by government (private land title). Asian Agri's through his subsidiary PT. Inti Indosawit Subur fully supported their smallholder to be certified by ensuring all FFB come from legal sources and comply with national regulation. They also conducted good engagement to demonstrated best management practices in agronomy, environmental handling and safety procedures. For example, each plot received 4 unit barn owl box to help them control rat population.</p> <p>During the audit, auditor also obtain information that PT. Inti Indosawit Subur are now assisting the smallholders on replanting project in collaborated with local government. This aims to ensure that farmers produce palm oil sustainably.</p>	
5.2.4	<p><b>(C)</b> Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.</p>	<p>Certificate holder has assign chemical weeding team (<i>Tim Unit Semprot/TUS</i>) in each estate/unit to handling chemical weeding activity. The team member originated from own workers (for own estate) and local communities (for smallholder). They regularly attended training on pesticide handling that conducted by the pesticide supplier in collaboration with local pesticide committee.</p> <p>Based on document review and interview with random pesticide applicator known that they were attending the last training on pesticide handling on 24 May 2019. Some topic that discuss such as safety pesticide handling, national regulation related to pesticide, symbol and label awareness and emergency procedure if any contamination or poisonous.</p> <p>During the audit, auditor also interviewed some smallholder representatives and obtain information that the company has provide training session for them on how</p>	Comply



		to handling pesticide safely. For example, pesticide applicator shall use appropriate PPE during application, no smoke, avoid the direction of wind blows and cleaned their body after application to reduce contamination.	
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	<p>Annual review of progress of the smallholder support by Asian Agri's can be see and downloaded in Asian Agri's website <a href="https://www.asianagri.com/id/panel-keberlanjutan/laporankeberlanjutan">https://www.asianagri.com/id/panel-keberlanjutan/laporankeberlanjutan</a>. Those document are publicly available.</p> <p>Plasma manager (KLU) also described that PT Inti Indosawit Subur also helped the smallholder based on monthly management review of smallholder performance as follows:</p> <ul style="list-style-type: none"> <li>• Assisted the <i>KUD's</i> to achieve the production and upkeep target. Until this audit, plasma area has been achieved 5% above the target.</li> <li>• Assisting the <i>KUD's</i> in replanting program. Until this audit, there is a record of approval by smallholder member in some <i>KUD's</i>. PT Inti Indosawit Subur as agreed to be bank guarantor for the financial scheme of replanting.</li> </ul> <p>Based on field visit and interview with smallholder representatives, each <i>KUD's</i> has been supported in IPM program. They equipped with beneficial plant and barn owl box (4 unit each plot). Certificate holder also conducted training in order to ensure the smallholder's competency. For example:</p> <ol style="list-style-type: none"> <li>a. Pesticide handling training on 24 May 2019 in Club House Ukui. Attended by 124 participants from chemical weeding team (<i>Tim Unit Semprot/TUS</i>) from own estates and <i>KUD's</i>.</li> <li>b. Harvesting training on 6 March 2019 in Club House Ukui. Attended by 69 participants from <i>KUD's</i>.</li> <li>c. First aid kit training on 20 April 2019 in Club House Ukui. Attended by 62 participants from <i>KUD's</i>.</li> </ol>	Comply

		<p>d. Basic fire training on 26 October 2019 in Club House Ukui. Attended by 114 participants from KUD's.</p> <p>e. Environmental Impact and High Conservation Value awareness training on 19 October 2019 in Club House Ukui. Attended by 50 participants from KUD's.</p>	
<p><b>Principle 6: respect workers' rights and conditions</b>          Protect workers' rights and ensure safe and decent working conditions.</p>			
<p><b>Criteria 6.1</b>          Any form of discrimination is prohibited.</p>			
6.1.1	<p><b>(C)</b> A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.</p>	<p>The company (Ukui 1 Estate and Smallholder) has procedure which regulated that hiring and promotion of workers are based on skill, work experiences, and job evaluation.</p> <p>Promotion and upgrade are based on employee appraisal conducted annually as outlined in the Employee Assessment Form signed by the employee concerned, approved by the line manager and checked by the General Manager. The form indicates that there is no indication of employment discrimination in terms of ethnicity, caste, religion, disability, gender, sexual orientation, union membership, political affiliation and/or age, for example:</p> <p>a. Promotion Document of Mr. Fatimano Gulo (Loader) from status of PKWT (temporary worker) to SKU-H (permanent worker) according to HR Manager Letter No. 088/ES-KUK/HR-RO2/MEMO/06/19 dated 27 June 2019.</p> <p>b. Promotion Document of Mr. Hadirat Zega (Loader) from status of PKWT (temporary worker) to SKU-H (permanent worker) according to HR Manager Letter No. 088/ES-KUK/HR-RO2/MEMO/06/19 dated 27 June 2019.</p> <p>Based on employee data period November 2019 and interview with some employees at the time of the harvest activities, spray and fertilizing, it is evident that there is no discrimination against employees in PT IIS Ukui 1 group including Smallholder.</p>	Comply

6.1.2	<p><b>(C)</b> Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against. Evidence includes migrant workers' non-payment of recruitment fees.</p>	<p>The company has procedure which regulated that hiring and promotion of workers are based on skill, work experiences, and job evaluation.</p> <p>Promotion and upgrade are based on employee appraisal conducted annually as outlined in the Employee Assessment Form signed by the employee concerned, approved by the line manager and checked by the General Manager. The form indicates that there is no indication of employment discrimination in terms of ethnicity, caste, religion, disability, gender, sexual orientation, union membership, political affiliation and/or age, for example:</p> <ul style="list-style-type: none"> <li>c. Promotion Document of Mr. Fatimano Gulo (Loader) from status of PKWT (temporary worker) to SKU-H (permanent worker) according to HR Manager Letter No. 088/ES-KUK/HR-RO2/MEMO/06/19 dated 27 June 2019.</li> <li>d. Promotion Document of Mr. Hadirat Zega (Loader) from status of PKWT (temporary worker) to SKU-H (permanent worker) according to HR Manager Letter No. 088/ES-KUK/HR-RO2/MEMO/06/19 dated 27 June 2019.</li> <li>e. Promotion Document of Mr. Sukidi (Harvester) from status of PKWT (temporary worker) to SKU-H (permanent worker) according to HR Manager Letter No. 088/ES-KUK/HR-RO2/MEMO/06/19 dated 27 June 2019.</li> </ul> <p>Promotion Document of Mr. Giyatno (Processing) from status of PKWT (temporary worker) to SKU-H (permanent worker) according to HR Manager Letter No. 088/ES-KUK/HR-RO2/MEMO/06/19 dated 27 June 2019.</p>	Comply
6.1.3	<p>The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p>	<p>Recruitment at Ukui 1 Estate and Smalholder, carried out on November 25, 2019 to procure employees as much as 7 persons, and was given a letter deal worked as a freelance daily worker (layoffs), for example:</p> <ul style="list-style-type: none"> <li>• Perjanjian Kerja Harian Lepas (temporary Workers) no. 045/PKHL/KET/XI/2019 dated 25 November 2019 on behalf of Mr. Erwin Ganesa (31 years old) for position: harvester.</li> </ul>	Comply

		<ul style="list-style-type: none"> <li>Perjanjian Kerja Harian Lepas (Temporary Workers) no. 046/PKHL/KET/XI/2019 dated 25 November 2019 on behalf of Mr. Samahato Lata (30 years old) for position processing palm oil.</li> </ul> <p>Based on it, the implementation of the medical examination of prospective workers carried out above by the doctor clinic carried out on November 25, 2019</p>	
6.1.4	<p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p>	<p>The company is regularly perform monitoring of pregnancy in monthly bases, for period July – November 2019, there were reported no workers in pregnant condition (negative detection) as many 24 female workers, e.g: Mrs. Siti Rahma, Mrs. Siti Rairan, Mrs. Nuranisah, Mrs. Ramlah, Mrs. Damasi, Mrs. Damasi, Mrs. Rahmi etc.</p> <p>From the results of this pregnancy check will make the basis for the type of work that is done, and if there is a female worker who is pregnant then is not allowed to work in relation to chemicals. .</p> <p><b>Smallholder-Ukui:</b></p> <p>Kebun Plasma Ukui has been performed monitoring and pregnancy testing every month and recorded on "Monitoring Pemeriksaan Kehamilan Untuk Pekerja atau Karyawan Semprot (TUS)". The latest performed on December 2019, there were reported no workers in pregnant condition (negative detection) as many 9 female workers: Ms. Kunik, Mrs. Selly, Mrs. Jumiah, Mrs. Sri Wahyuni, Mrs. Mayrianti, Mrs. Sari, Ms. Susi, Ms. Sitimas Kurroh and Ms. Lia.</p>	Comply
6.1.5	<p><b>(C)</b> A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p>	<p>There is a gender committee, which have program to regularly meets in monthly basis, discussing general agenda and other issue related to handling sexual harassment and dissemination of sexual harassment prevention. The Gender Committee conduct monthly meeting to discuss issues which raised by members (if any), the last meeting of Gender Committee was conducted on 9 October 2019, there is no issues raised related gender, discrimination and/or harassment. The gender committee has understood the grievance mechanism as well as the protection of the identity of the complainant/whistle-blower.</p>	Comply

		<p>Implemented policy on prevention of sexual harassment and violence against women, the policy is prominently displayed on notice boards at the Mills and the Estates muster areas. Interviews of female staff, workers and union representatives confirmed that the company implemented the sexual harassment policy.</p> <p>Work program Gender Committee of PT IIS Ukui Group year 2019, these included:</p> <ol style="list-style-type: none"> <li>1. Special activities: <ul style="list-style-type: none"> <li>• women-do clean Friday – pembersihan pada hari Jumat</li> <li>• Posyandu activities (integrated services post for toddlers)</li> <li>• Healthy activities for employees mothers</li> <li>• Socialization related to sexual harassment and violence against the women</li> </ul> </li> <li>2. Communication with the management related company employees complaints (especially female employees): <ul style="list-style-type: none"> <li>• Routine meetings at least 1 times a year</li> <li>• Socialization associated with sexual abuse and rights employees perempuan</li> </ul> </li> </ol> <p><b>Smallholders Ukui:</b></p> <p>Plasma Ukui 1 has demonstrated the policy to prevent sexual harassment and violence against women in "Kebijakan ICS Group Manager" issued dated 16<sup>th</sup> January 2018, in chapter 11 was stated "Mencegah pelecehan seksual dan berbagai bentuk kekerasan terhadap perempuan serta melindungi hak hak reproduksinya (prevent sexual harassment and violence as well as protect reproductive rights for women)".</p> <p>The policy has communicated to all scheme smallholders member and displayed in publication board in each KUDs office. On period 2019 base on interview with workers, there is no issues raised related gender, discrimination and/or harassment.</p>	
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6.1.6	There is evidence of equal pay for the same work scope.	The company proves that it guarantees that related to the wage is in accordance with the laws and regulations applicable to the scope of work that has been made. Based on interviews and verification documents, the company has adopted wages in accordance with regulations and legislation. (See: 6.2)	Comply
<b>Criteria 6.2</b> Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).			
6.2.1	<b>(C)</b> Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages and explained to them in language they understand.	<p>The Company already has Collective Work Agreement (PKB) period 2018-2020 which has been approved by the Director General of Industrial Relations and Social Security of Workers through Decision Letter no. B.319/PHIJSK/X/2018 dated 26 October 2018 concerning Registration of "PKB Badan Kerjasama Perusahaan Perkebunan Sumatera (BKS-PPS)" with Central Board of Federasi Serikat Pekerja Pertanian dan Perkebunan - SPSI. PKB is binding for all SKU-H and SKU-B levels. The PKB is valid for 2 years and build in Indonesian language.</p> <p>The PKB document regulates provisions regarding working time, wage system, assistance for sick days, absenteeism, tour of external services, overtime work, and payment of allowances while in the hold of state equipment. PKB is also provisions regarding premiums, payment of holiday allowances and bonuses, guarantees Social and Social Assistance, Work Equipment and Occupational Safety, Acceptance, Transfer of Promotions and Layoffs, Provisions for motorized vehicles for workers and educators, Company and Worker Obligations, Manpower Settlement Methods and the Termination of Company Regulations.</p> <p>Article V (Wages) regulates:</p> <ul style="list-style-type: none"> <li>• Wages</li> <li>• Rice / Natura Supply Allowances</li> <li>• Provisions concerning who is entitled to receive a rice supply, and</li> <li>• Dependents of workers.</li> </ul>	Comply

		<p>The company determines minimum wages based on the Government regulation annually, the minimum wages in 2019 as regulated in "Surat Keputusan Gubernur Riau No. Kpts. 661/III/2019", dated 25/03/2019 for Agriculture sector (Karet, Kelapa, Kelapa Sawit) and Mill in Province of Riau is IDR 2,820,000/month. Based on review of payments slip, there is no worker paid below minimum wages.</p>	
<p>6.2.2</p>	<p><b>(C)</b> Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed, including work done by family members.</p>	<p>The PKB document regulates provisions regarding working time, wage system, assistance for sick days, absenteeism, tour of external services, overtime work, and payment of allowances while in the hold of state equipment. PKB is also provisions regarding premiums, payment of holiday allowances and bonuses, guarantees Social and Social Assistance, Work Equipment and Occupational Safety, Acceptance, Transfer of Promotions and Layoffs, Provisions for motorized vehicles for workers and educators, Company and Worker Obligations, Manpower Settlement Methods and the Termination of Company Regulations.</p> <p>Based on verification of documents and interviews with workers stated that each worker has a Work Agreement with companies made in Indonesian as a language understood by all ethnic groups in PT IIS -UKUI Group. The Work Agreement Letter regulates Position, validity period and expiration of employment agreement, Obligations of workers, Placement / Transfer / Transfer, Payroll, Treatment, Annual leave, Worker Guarantee, Termination of employment, termination of employment and others. The employment contract has explained the related period of agreement, wages and payment (IDR. 112,800 per day in accordance with the Governor's Decree on Wages in 2019), allowances (holidays and others), attachments related to disgraceful acts / actions; which explains related to discrimination, child labor, workers' code of ethics, sexual harassment and coercion, for example:</p> <ul style="list-style-type: none"> <li>- Employment Contract - Perjanjian Kerja Perjanjian Kerja Untuk Jangka Waktu Tertentu (PKWT) no. 159/KUK/SPK/VII/2019, dated 1 July 2019 on behalf of Fatimano Gulo for position harvester, valid until 30 June 2020.</li> </ul>	<p>Comply</p>

		<p>- Employment Contract - Perjanjian Kerja Harian Lepas no. 002/PKHL/KSL/X/2019, dated 22 October 2019 on behalf of Vishen Laksana for position upkeep, valid until 22 October 2020.</p> <p><b>Ukui Smallholder:</b></p> <p>Farmer members of Kebun Plasma Ukui were not directly conducted the spraying work and handle the pesticide/herbicide. Spraying works and pesticide handling was performed by PT Inti Indosawit Subur, hence the chemical was stored by PT Inti Indosawit Subur in Agrochemical storage. Noted that, no outbreak of pest at all the sample farmers' area. Spraying works performed by TUS team which provided by PT Inti Indosawit Subur according to:</p> <ul style="list-style-type: none"> <li>- Letter of Cooperation Agreement for Procurement of TUS Plasma Ukui - Surat Perjanjian Kerjasama Pengadaan TUS Plasma Ukui No. 02/SPK/SPK-TUS/KLU/I/2019 dated 4 January 2019 between KUD Mekar Abadi and PT Inti Indosawit Subur</li> <li>- Letter of Cooperation Agreement for Procurement of TUS Plasma Ukui - Surat Perjanjian Kerjasama Pengadaan TUS Plasma Ukui No. 02/SPK/SPK-TUS/KLU/I/2019 dated 4 January 2019 between KUD Trani Maju and PT Inti Indosawit Subur</li> <li>- Fertilizer Work Agreement - Surat Kesepakatan Pekerja Pupuk no. 01 / DOK.Mekar Abadi / SK / XII / 2018 dated 27 December 2018 on behalf of all KUD Mekar Abadi plasma fertilizer workers (List of fertilizers attached to the contract as many as 50 people). The work agreement contract contains fertilizer wages of IDR 10,000 per sack, allowances and bonuses for using PPE. There is even a statement about child labor (Article 8): "the use of child labor is only allowed on family plantations" (not in accordance with Ukui Plasma policy 1).</li> </ul>	
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6.2.3	<p><b>(C)</b> There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.</p>	<p>The PKB document regulates provisions regarding working time, wage system, assistance for sick days, absenteeism, tour of external services, overtime work, and payment of allowances while in the hold of state equipment. PKB is also provisions regarding premiums, payment of holiday allowances and bonuses, guarantees Social and Social Assistance, Work Equipment and Occupational Safety, Acceptance, Transfer of Promotions and Layoffs, Provisions for motorized vehicles for workers and educators, Company and Worker Obligations, Manpower Settlement Methods and the Termination of Company Regulations.</p> <p>Based on verification of documents and interviews with workers stated that each worker has a Work Agreement with companies made in Indonesian as a language understood by all ethnic groups in PT IIS -UKUI Group. The Work Agreement Letter regulates Position, validity period and expiration of employment agreement, Obligations of workers, Placement / Transfer / Transfer, Payroll, Treatment, Annual leave, Worker Guarantee, Termination of employment, termination of employment and others. The employment contract has explained the related period of agreement, wages and payment (IDR. 112,800 per day in accordance with the Governor's Decree on Wages in 2019), allowances (holidays and others), attachments related to disgraceful acts / actions; which explains related to discrimination, child labor, workers' code of ethics, sexual harassment and coercion.</p> <p>Based on the results of interviews with the management of Serikat Pekerja Pertanian dan Perkebunan-Serikat Pekerja Seluruh Indonesia (PUK-SPPP-SPSI) and workers stated that the company has realized the normative employment obligations stipulated in the Joint Work Agreement.</p>	Comply

<p>6.2.4</p>	<p><b>(C)</b> The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers’ Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.</p>	<p>The company has prepared facilities for the workers, including the basic need such as electricity and water. Detail of company facilities for employees are as follows:</p> <ul style="list-style-type: none"> <li>- Ukui I Mill Housing, consist of Type B (2 units), type C (5 units), type D (14 units), Type E (86 units),</li> <li>- Ukui Estate Housing, consist of Type B (3 units), Type C 22 units), typ D (26 units), type E (454 units)</li> <li>- Polyclinic (1 unit),</li> <li>- Mosque (1 units),</li> <li>- Church (1 unit),</li> <li>- Community hall (1 unit),</li> <li>- Kindergarden (1 units)</li> <li>- Elementary School (2 units)</li> <li>- Sport Centre (1 unit)</li> <li>- School bus (2 units),</li> <li>- The water supply is clean. Water quality is being checked and monitored on regular basis.</li> </ul>	<p>Comply</p>
<p>6.2.5</p>	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p>	<p>Company is able to demonstrate effort in providing access to adequate, sufficient and affordable food: provision of rice allowance – aside from monthly salary to all eligible workers, cooperative organization for employee providing basic food necessities (Waserda Koperasi Karya Bersama). Company is also accommodating weekly market for each estate; Sunday for Ukui Estate.</p> <p><b>Ukui Smallholder:</b></p> <p>The farmer member villages are a developed Transmigration Village. Provision of food can be obtained from existing markets in the village. Based on the results of field visits to the sample villages indicate that in the village was available weekly markets and stalls that provide basic necessities.</p>	<p>Comply</p>

<p>6.2.6</p>	<p>A DLW is paid to all workers, including those on piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p>	<p>The company determines minimum wages based on the Government regulation annually, the minimum wages in 2019 as regulated in "Surat Keputusan Gubernur Riau No. Kpts. Kpts.661/III/2019", dated 25/03/2019 for Agriculture sector in Pelalawan Regency is IDR 2,820,000/month. Based on review of payments slip, there is no worker paid below minimum wages.</p> <p>Based on Memorandum no. 012/HR-AAS/MEMO/05/19 dated 2 May 2019, the company has determined daily wages for PHL workers to be IDR 112,800/manday or IDR 2,820,000/month and SKU-H workers to be IDR 2,679,000/Month plus rice allowances as IDR 8,000 per Kg. This value does not include Rice Allowance as stipulated in PKB that it is part of basic wage.</p> <p>In general, the UKUI Group including smallholders have calculated the Decent Living Needs using the calculation method as set out in the "RSPO Guidance for Implementing a Decent Living Wage", June 1, 2019. The company has conducted an account of the DLW for the 2018 period with data drawn from each -each estate 8 and POM.</p> <p>Based on the verification of documents the results of the 2018 DLW calculation shows that:</p> <p><u>Employees of Inti:</u></p> <ul style="list-style-type: none"> <li>• Total Living Basket : IDR 2,335,521,-</li> <li>• Net Living Wage : IDR 2,335,521</li> <li>• Total Mandatory deduction : IDR. 106,033,-</li> <li>• Gross Living Wage : IDR. 2,441,553,-</li> <li>• Prevailing Wage : IDR. 2,820,000,-</li> <li>• Living Wage Gap : + IDR 318,447,- (Positif)</li> </ul> <p><u>Employees of Smallholder:</u></p> <ul style="list-style-type: none"> <li>• Total Living Basket : IDR 2,335,521,-</li> <li>• Net Living Wage : IDR 2,335,521</li> <li>• Total Mandatory deduction : IDR. 106,033,-</li> </ul>	<p>Comply</p>
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		<ul style="list-style-type: none"> <li>• Gross Living Wage : IDR. 2,441,553,-</li> <li>• Prevailing Wage : IDR. 2,820,000,-</li> <li>• Living Wage Gap : + IDR 318,447,- (Positif)</li> </ul> <p><u>Employees of KUD:</u></p> <ul style="list-style-type: none"> <li>• Total Living Basket : IDR 4,305,,102,-</li> <li>• Net Living Wage : IDR 3,874,592,-</li> <li>• Total Mandatory deduction : IDR 195,452,-</li> <li>• Gross Living Wage : IDR. 4,070,044,-</li> <li>• Prevailing Wage : IDR. 2,820,000,-</li> <li>• Living Wage Gap : - IDR 1,250,044,- (Negatif)</li> </ul> <p>Piece rate / qoutas calculation has been calculated based on the achievement of 7 working hours in accordance with applicable regulations (UU No. 13/2003), for example:</p> <p>Calculation of labor harvest in Plasma:</p> <ul style="list-style-type: none"> <li>- Ability to harvest power for 7 hours per day: 3,000 kg</li> <li>- Harvest area: 4 hectares</li> <li>- Job performance in 1 hour 429 kg / hour</li> <li>- Basic wages Based on the provisions of Prov. Riau: IDR. 112,800 per day</li> <li>- Price of harvest: IDR. 38 / kg</li> <li>- Price per hectare: IDR. 28,200 per Ha</li> <li>- Actual Harvest Costs (currently in effect): IDR 150 / Kg</li> <li>- There is a gap of: 299% positive.</li> </ul> <p>Calculation of fertilizer labor piece rate:</p> <ul style="list-style-type: none"> <li>- The ability to sow fertilizer for 7: 600 kg</li> </ul>	
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		<ul style="list-style-type: none"> <li>- Tonnage per hour: 86 Kg / hour</li> <li>- Basic wages Based on the provisions of Prov. Riau: IDR. 112,800 per day</li> <li>- Fertilizer wages: IDR. 188 / Kg</li> <li>- Actual fertilization wages (valid now): IDR. 200 / kg</li> </ul> <p>There is a gap of: 6% positive.</p>	
<p><b>PROCEDURAL NOTE:</b>          The RSPO Labour Task Force will prepare guidance on the DLW implementation, including details on how to calculate a DLW, expected for 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist.</p>			
6.2.7	<p>Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.</p>	<p>Based on the verification of labor documents period shows that PT IIS - Ukui Group still has casual daily laborers and PKWT, however, the main types of work such as fertilizer harvesting and production, while some types of jobs that are seasonal and limited work are carried out by Freelance and Daily Workers PKWT (certain time workers). PT IIS-Ukui Group in the present period has Replanting work which is mostly done by temporary workers (BHL and PKWT).</p> <p><b>Non conformity (minor):</b>          Berdasarkan data karyawan Kebun UKUI 1 periode November 2019, terdapat karyawan panen dan muat TBS yang merupakan kegiatan utama di perkebunan kelapa sawit sebanyak 119 orang dan belum diangkat menjadi karyawan tetap.</p> <p>-----</p> <p>Based on the employee data of UKUI I Estate period November 2019, there are harvest and load FFB employees which is the main activity in oil palm plantations as many as 119 people and has not been appointed as permanent employees.</p> <p>Objective evidence:</p>	Nonconformity

		<p>Berdasarkan data karyawan Kebun Ukui 1 periode November 2019, bahwa terdapat 119 karyawan panen dan muat TBS yang belum dilakukan pengangkatan menjadi karyawan tetap, walaupun terdapat pengajuan sebagai karyawan PHL menjadi PKWT sebanyak 28 orang (23,5%) berdasarkan Meomorandum no. 88/ES-KUK/MEMO/06/19 tanggal 27 Juni 2019 dari Est. Manager Ukui ke Regional Head Plantattion II.</p> <p>-----</p> <p>Based on the employee data of Ukui 1 Estate period November 2019, there are 119 harvest and load FFB employees who have not carried out the appointment as permanent employees, although there are submissions from PHL to PKWT as much as 28 workers (23.5%) through on Memorandum No. 88/ES-KUK/MEMO/06/19 dated June 27, 2019 from Est. Manager Ukui to Regional Head Plantattion II.</p>	
<p><b>Criteria 6.3</b>          The unit of certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			
<p>6.3.1</p>	<p><b>(C)</b> A published statement recognising freedom of association and right to collective bargaining in national languages is available and is explained to all workers in languages that they understand, and is demonstrably implemented.</p>	<p>PT Inti Indosawit Subur – Ukui Group has company policy signed by Managing Director on 01/12/2014. The policy stated company guarantee freedom of association or be part of worker union as well as collective bargaining.</p> <p>There is a worker union for Ukui Estate and Ukui I POM named “Pengurus Unit Kerja (PUK) Serikat Pekerja Pertanian dan Perkebunan-Serikat Pekerja Seluruh Indonesia (PUK-SPPP-SPSI) PT Inti Indosawit Subur Kebun Ukui dan Pabrik Ukui Satu” as per “Surat Keputusan Pengurus Cabang Federasi SPPP-SPSI Kabupaten Pelalawan No.Kep. 17-A/PC-FSP.PP/K-SPSI/PLLW/10/2017” dated 15 October 2017 and valid for 5 years.</p>	<p>Comply</p>

		<p>Organization Structure of Pengurus Unit Kerja (PUK) Serikat Pekerja Pertanian dan Perkebunan (SPPP)- Serikat Pekerja Seluruh Indonesia (SPSI) PT Inti Indosawit Subur Kebun Ukui is as follows:</p> <ul style="list-style-type: none"> <li>- Chairman : Natangsa Sembiring</li> <li>- Vice Chairman : Suwito : Rusli</li> <li>- Secretary : Hans Meliando</li> <li>- Vice Secretary : Sutrisno</li> </ul> <p>PT IIS-Ukui Group workers union has been registered in Dinas Tenaga Kerja (Manpower Agency) of Pelalawan Regency on 7 December 2006 as mentioned in "Tanda Bukti Pencatatan Serikat Pekerja" No. 004/Disnaker/ PEN/SPPP-SPSI/2006 named PUK-SPPP-SPSI PT Inti Indosawit Subur Kebun Ukui.</p> <p><b>Ukui Smallholder:</b></p> <p>Based on the results of interviews with farmer members, indicates that they have understood the policy published by the Smallholder Manager dated 16 January 2017 wherein it also concerns the policy of freedom of association.</p> <p>Based on document verification as well as interviews with harvest laborers, they have not been willing to establish worker unions until now.</p>	
6.3.2	<p>Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages and made available upon request.</p>	<p>SPSI meeting with management, including:</p> <ol style="list-style-type: none"> <li>1. The meeting between SPSI and the Management of PT IIS on August 27, 2019, there were several discussions, related: delivery of production targets and the preparation of labor needed and socialization to employees regarding awareness of the use of PPE</li> <li>2. Minutes of the meeting for the meeting on October 9, 2019, a meeting to discuss related:</li> </ol>	Comply

		<ul style="list-style-type: none"> <li>- Adding keluhanwater storage in central housing</li> <li>- Payment of pruning wages</li> <li>- Providing work / harvest tools (fiber, egrek etc.)</li> <li>- Wages and transport premiums are empty</li> </ul> <p>3. Minutes of the meeting for the meeting on October 23, 2019, a meeting to discuss related: delivery of productivities of harvester and mandatory for PPE wearing to all workers.</p> <p>4. Meeting with the management Ukui 1 Estate on October 23, 2019, discussed associated with the submission of the target production and lack of labor, liabilities use of personal protection for the entire employees. Harvesters.</p>	
6.3.3	Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.	<p>PT Inti Indosawit Subur – Ukui Group has company policy signed by Managing Director on 01/12/2014. The policy stated company guarantee freedom of association or be part of worker union as well as collective bargaining.</p> <p>Based on the interview with the manager of the parent trade union as well as Estate Coordinator (Mr. Zainal Arifin Bangun and Mr. Rahmad), the management does not intervene in the formation/the establishment of a union manager, but the facility/office is indeed provided. Management also provides allowance to the workers ' Union officers to hold events related to the unions organization e.g. permission to hold board meetings, electing admins etc. PT IIS-UKUI Group has been established bipartite Cooperation Institute (LKS) and meeting with management once a month.</p>	Comply
<p><b>Criteria 6.4:</b> Children are not employed or exploited.</p>			
6.4.1	A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.	PT Inti Indosawit Subur – Ukui I POM has established a formal policy for the protection of children, including prohibition of child labour and remediation as per "Kebijakan Perusahaan", was signed by management on 01/12/2014, in point 14 was stated: It is not allowed all children to work in each activities in operational.	Comply



		<p>Verification of Ukui Estate employee data period November 2019 shows that no indication of worker with age below 18 years old during recruitment or at the present time.</p> <p>Sample verified:</p> <ol style="list-style-type: none"> <li>1. Arfanta Surbakti (PHL – division II), birthdate 6<sup>th</sup> June 1998, joined on 1<sup>st</sup> February 2018.</li> <li>2. Irvan Abdurahman (PHL), birthdate 9 October 1999, joined on 1 October 2018 (19 years and 8 month).</li> <li>3. Andri Siregar (PHL) birthdate 3 January 1999, joined on 1 July 2018 (19 years and 6 month).</li> </ol> <p>Scheme Smallholders Ukui Group (sample: KUD Sumber Bahagia, KUD Karya Bersama and KUD Usaha Baru):</p> <p>Group Manager has established the formal policy for the protection of children, including prohibition of child labour and remediation as per Cooperative Policy – “Kebijakan Koperasi”, in point 10 was stated “Melarang anak-anak bekerja dalam setiap kegiatan operational kebun” – prohibit the children to works in operational smallholders.</p> <p>Based on the results of interviews with smallholder members during filed visit (date 17<sup>th</sup> and 18<sup>th</sup> December 2019) indicates that they have understood the policy published by the Smallholder Manager dated 3<sup>rd</sup> January 2019 which in it also concerns the prohibition to employ children under age in palm oil plant operations.</p> <p>Based on document verification has shown that no indication of using child labour or worker under 18 years old. The youngest workers namely Mr Jambri date of birth 4<sup>th</sup> April 1993 (dated of joined 1<sup>st</sup> May 2014), 20 years old and 6 months.</p>	
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6.4.2	<p><b>(C)</b> There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.</p>	<p>As per explained at indicator 6.4.1, the requirement for minimum age are met.</p> <p>Data verified:</p> <ul style="list-style-type: none"> <li>- Based on the results of interviews with smallholder members during filed visit (date 17<sup>th</sup> and 18<sup>th</sup> December 2019) indicates that they have understood the policy published by the Smallholder Manager dated 3<sup>rd</sup> January 2019 which in it also concerns the prohibition to employ children under age in palm oil plant operations.</li> <li>- Based on document verification has shown that no indication of using child labour or worker under 18 years old. The youngest workers namely Mr Jambri date of birth 4<sup>th</sup> April 1993 (dated of joined 1<sup>st</sup> May 2014), 20 years old and 6 months.</li> <li>- Based on list of employee in Ukui I POM as per "Data Karyawan PMKS Ukui", there was shown the youngest employee namely Mrs Radot Dolok Saribu (helper in warehouse), dated of birth 17<sup>th</sup> October 1998 (date of joined 7<sup>th</sup> January 2019), age: 21 years old.</li> </ul>	Comply
6.4.3	<p><b>(C)</b> Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.</p>	<p>As outlined in indicator 6.4.1, the company has a policy on the Prohibition of Child Labor as outlined in the company's "</p> <p>Based on verification of worker documents for period October 2019 in each Estate and Mill, there are no workers who are less than 18 years of age when hired as workers.</p>	Comply
6.4.4	<p>The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.</p>	<p>Based on interviews with contractors, workers union officials, Group Manager committees and workers in field, showed that they have understood company policies to prohibit the use of child labor in all types of company operational activities.</p>	Comply

		<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"> <li>1. Post the policy on the bulletin board in each estate/mill office</li> <li>2. Conducting verbal dissemination to workers, especially types of work which are vulnerable to use "informal workers" such as in the harvesting.</li> </ol> <p>Include a clause of prohibiting the use of child labor in each contract document with the contractor.</p>	
<p><b>Criteria 6.5:</b>          There is no harassment or abuse in the workplace, and reproductive rights are protected.</p>			
6.5.1	<p><b>(C)</b> A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.</p>	<p>PT Inti Indosawit Subur – Ukui Group has established a policy to protect the reproductive rights as it is found in Company Policy that's signed by Managing Director, dated 01st December 2014 and on one part of the policies stated that: <i>"Mencegah pelecehan seksual dan berbagai bentuk kekerasan terhadap perempuan serta melindungi hak-hak reproduksinya (To prevent any sexual or physical abuses happen to women as well as to protect their reproductive rights)"</i>. There is a gender committee actively meets and discussing general agenda and other issue related to handling sexual harassment, dissemination of sexual harassment prevention.</p> <p>Implemented policy on prevention of sexual harassment and violence against women, the policy is prominently displayed on notice boards at the Mills and the Estates muster areas. Interviews of female staff, workers and union representatives confirmed that the company implemented the sexual harassment policy.</p> <p><b>Smallholders Ukui Group:</b></p> <p>Plasma Ukui Group has demonstrated the policy to prevent sexual harassment and violence against women in "Kebijakan ICS Group Manager" issued dated 16<sup>th</sup> January 2018, in chapter 11 was stated "Mencegah pelecehan seksual dan berbagai bentuk</p>	Comply

		<p>kekerasan terhadap perempuan serta melindungi hak hak reproduksinya (prevent sexual harassment and violence as well as protect reproductive rights for women)".</p> <p>The policy has communicated to all scheme smallholders member and displayed in publication board in each KUDs office.</p> <p>Sosialisasi kebijakan dated 6<sup>th</sup> October 2018 was attended by spaying team, e.g: Mrs Siti Atikah, Mrs Siti Aisyah, Mrs Siti Suryani, Mrs Haerani, etc.</p>	
6.5.2	<p><b>(C)</b> A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.</p>	<p>PT Inti Indosawit Subur – Ukui Group has established a policy to protect the reproductive rights as it is found in Company Policy that's signed by Managing Director, dated 01st December 2014 and on one part of the policies stated that: "Mencegah pelecehan seksual dan berbagai bentuk kekerasan terhadap perempuan serta melindungi hak-hak reproduksinya (To prevent any sexual or physical abuses happen to women as well as to protect their reproductive rights)". There is a gender committee actively meets and discussing general agenda and other issue related to handling sexual harassment, dissemination of sexual harassment prevention.</p> <p>Implemented policy on prevention of sexual harassment and violence against women, the policy is prominently displayed on notice boards at the Mills and the Estates muster areas. Interviews of female staff, workers and union representatives confirmed that the company implemented the sexual harassment policy.</p> <p>The company is regularly perform monitoring of pregnancy in monthly bases, for period July – November 2019, there were reported no workers in pregnant condition (negative detection) as many 41 female workers, e.g: Mrs. Siti Rahma, Mrs. Siti Rairan, Mrs. Nuranisah, Mrs. Ramlah, Mrs. Damasi, Mrs. Damasi, Mrs. Rahmi etc.</p> <p><b>Ukui Smallholders:</b></p>	Comply

		<p>Plasma Ukui 2 has demonstrated the policy to prevent sexual harassment and violence against women in "Kebijakan ICS Group Manager" issued dated 16<sup>th</sup> January 2018, in chapter 11 was stated "Mencegah pelecehan sexual dan berbagai bentuk kekerasan terhadap perempuan serta melindungi hak hak reproduksinya (prevent sexual harassment and violence as well as protect reproductive rights for women)".</p> <p>The policy has communicated to all scheme smallholders member and displayed in publication board in each KUDs office.</p> <p>Socialisation of policy has performed on 6<sup>th</sup> October 2018 and attended by spaying team, e.g: Ms. Kunik, Mrs. Selly, Mrs. Jumiah, Mrs. Sri Wahyuni, Mrs. Mayrianti, Mrs. Sari, Ms. Susi, Ms. Sitimas Kurroh and Ms. Lia.</p>	
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.	For breastfeeding mothers and had children under 5 years, the company has provided child care (TPA) which is located in each division/Afdeling. In landfill space as well as the company provides a special space and time for 1 hour for breastfeeding mothers in need time to nursing his baby.	Comply
6.5.4	A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.	<p>PT Inti Indosawit Subur – Ukui Group has prepared procedure on a specific grievance mechanism which respects anonymity of complainants under Standard Operating Procedure, No. SOP:-HR-308.5-RO; Revision:0, 11/12/2009: Employees complaints: Submission and settlement.</p> <p>Mechanism for complaints management where it needs to protect its confidentiality for complaint submitter was found in company policy's draft as in one of points of this policies stated that: "to provide appropriate information for those who inquiry it and to proted its confidentiality for whistleblower cases in accordance to law regarding environmental and social issue, food safety, health and safety work, so that it enables them to more participate to the decision making processes for improving company's performance.</p> <p>Record of complaint/specific grievance has demonstrated under "Buku Keluhan Karyawan". Up to November 2019 at Ukui 1 Estate there were 13 complaints /</p>	Comply

		<p>grievances recorded and each recommendation responses has followed up as well. The mostly of grievance or complaint from employees is related to the damage of housing and public facilities, for example:</p> <ul style="list-style-type: none"> <li>- Complaint on 23 May 2019 from employee namely Budi Sukamto, related Stairs and the bathroom door suffered damage, this complaint has followed up on 28 May 2019.</li> <li>- Complaint on 25 August 2019 from employee namely Boi Nduru, related leaked of septic tank, this complaint has followed up on 25 May 2019.</li> <li>- Complaint on 30 August 2019 from employee namely Ekianus Zega, related leaked of zinc roof house, this complaint has followed up on 30 August 2019.</li> </ul> <p><b>Ukui Smallholders:</b></p> <p>The scheme smallholders have mechanism of consultation and communication in "Mekanisme komunikasi, konsultasi dan keluhan Kebun Plasma Ukui Group", dated 16<sup>th</sup> January 2018.</p> <p>Based on log book of record in the form of "Penerimaan Keluhan dan Tanggapan". On 2019 period, there was no grievance reported, all of complaints has been followed and recorded.</p>	
<p><b>Criteria 6.6:</b>          No forms of forced or trafficked labour are used.</p>			
6.6.1	<p><b>C)</b> All work is voluntary and following are prohibited:</p> <ul style="list-style-type: none"> <li>• Retention of identity documents or passports</li> <li>• Payment of recruitment fees</li> </ul>	<p>Based on the interview with workers as well as the officers of the unions stated that there was no indication companies both of Inti and smallholder at Ukui 1 Group to do practices:</p> <ul style="list-style-type: none"> <li>• Retention of identity documents or passports</li> <li>• Payment of recruitment fees</li> </ul>	Comply

	<ul style="list-style-type: none"> <li>• Contract substitution</li> <li>• Involuntary overtime</li> <li>• Lack of freedom of workers to resign</li> <li>• Penalty for termination of employment</li> <li>• Debt bondage</li> <li>• Withholding of wages</li> </ul>	<ul style="list-style-type: none"> <li>• Contract substitution</li> <li>• Involuntary overtime</li> <li>• Lack of freedom of workers to resign</li> <li>• Penalty for termination of employment</li> <li>• Debt bondage</li> <li>• Withholding of wages</li> </ul>	
6.6.2	<p><b>(C)</b> Where temporary or migrant workers are employed, a specific labour policy and procedures are established and implemented.</p>	<p>Based on employment document verification period indicates that there is no daily labor status off in pt agromuko and pt mmas. The rest of the core workers already have a certain time worker status (PKWT/Temporary workers) and permanent labor (SKUs-H and SKUs-B). Gradually has done the appointment of the status of PKWT be permanent labor (SKUs-h).</p> <p>For these kinds of wholesale work pt agromuko in collaboration with the provider of local labor services to do seasonal work like replanting.</p>	Comply
<p><b>Criteria 6.7:</b> The unit of certification ensures that the working environment under its control is safe and without undue risk to health.</p>			
6.7.1	<p><b>(C)</b> The responsible person(s) for H&amp;S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p>	<p>PT Inti Indosawit Subur – Ukui I POM has demonstrated the responsible person(s) for HSE as per P2K3 (Safety Committee). The P2K3 has registered to Manpower Agency in Riau Province as per document of “Keputusan Kepala Dinas Tenaga Kerja dan Transmigrasi Propinsi Riau No: KEP.146/Disnakertrans-PK/SK-P2K3/VII/2018 tentang Pengesahan Panitia Pembina Keselamatan dan Kesehatan Kerja (P2K3) Tingkat Propinsi Riau pada PT Inti Indosawit Subur – Kebun Ukui”, dated 23<sup>rd</sup> July 2018.</p>	Comply

		<p>PT Inti Indosawit Subur – Ukui I POM has also appointed a safety officer (OHS expert – AK3), namely Mr Januar Sasmitra; license number: Reg. 34813/PK2/AJ/2016/PO, dated 21<sup>th</sup> November 2016</p> <p>Sample record of periodical meeting and performance report of OHS committee, e.g:</p> <ul style="list-style-type: none"> <li>• Dated 10<sup>th</sup> October 2019, location in Club House Ukui Group, agenda: review of action progress of last meeting, review of OHS inspection, review of accidents report.</li> <li>• Report of OHS performance (per 3 month bases), was submitted to Manpower Agency (DISNAKERTRANS) in Riau Province, last report for period July to September 2019, was received by Mr Ridul R (Staff of DISNAKERTRANS in Riau Province, dated 5<sup>th</sup> November 2019).</li> </ul> <p>Scheme Smallholders Ukui Group:</p> <ul style="list-style-type: none"> <li>– KUD Karya Bersama -&gt; responsible person(s) for OHS in Smallholder was appointed based in "Surat Keputusan Pengurus Sumber Makmur nomor 003/KUD-KB/SKPPK3/AE/I/2018 tentang Penunjukan/Pengangkatan Petugas Yang Bertanggungjawab untuk Pengawasan Kegiatan K3" for namely Mrs Erlin Mega Saputri (KUD team in Karya Bersama), dated 18<sup>th</sup> January 2018.</li> <li>– KUD Sumber Bahagia -&gt; responsible person(s) for OHS in Smallholder was appointed based in "Surat Keputusan Pengurus Bakti nomor 003/KUD-SB/SKPPK3/SH/I/2018 tentang Penunjukan/Pengangkatan Petugas Yang Bertanggungjawab untuk Pengawasan Kegiatan K3" for namely Mrs Sari (KUD Team in Sumber Bahagia), dated 12<sup>th</sup> January 2018</li> <li>– KUD Usaha Baru -&gt; responsible person(s) for OHS in Smallholder was appointed based in "Surat Keputusan Pengurus Bukit Potalo nomor 003/KUD-UB/SKPPK3/UKII/I/2018 tentang Penunjukan/Pengangkatan Petugas Yang Bertanggungjawab untuk Pengawasan Kegiatan K3" for namely Mr Mardi (KUD Team in Usaha Baru), dated 12<sup>th</sup> January 2018</li> </ul>	
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		<p>– Last OHS meeting conducted on 12<sup>th</sup> July 2019, the record as per “Notulen Pertemuan Pembahasan K3 (basic safety and PPE), detail record, attended by 36 participants, location in Plasma Office.</p>	
<p>6.7.2</p>	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in the appropriate language of the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p>	<p>PT Inti Indosawit Subur – Ukui I POM has prepared the document of emergency procedures, first aid and emergency situation as per “Penanganan Keadaan Darurat – Pertolongan Pertama pada Kecelakaan No: AA-447-001-FM-R1”, last version in December 2014.</p> <p>Emergency response team has defined as part of safety committee (P2K3 – see indicator 6.7.1). The organization are able to demonstrate adequate first aid officer, equipped with first aid kit, e.g: first aid officer for Ukui I POM and Ukui Estate, named Mrs Samiasih (license number: Ser.4733/PK3-P3K/X/2015 dated 22<sup>nd</sup> October 2015 as “Pembinaan Keselamatan dan Kesehatan Kerja (K3) Bidang Pertolongan Pertama Pada Kecelakaan di Tempat Kerja”)</p> <p>Data seen:</p> <ul style="list-style-type: none"> <li>• Training for first aider dated 28<sup>th</sup> November 2019 was attended by 18 workers. Evidences: attendance list, documentation and training material.</li> <li>• Certificate for first aider No” Ser.950/PK3-P3K/III/2014, namely Mrs Marlina Pruba as first aider at workplace.</li> </ul> <p>Scheme Smallholders Ukui Group (sample: KUD Sumber Bahagia, KUD Karya Bersama and KUD Usaha Baru):</p> <p>Procedure on accident and emergency procedures are available and disseminated to all group members. The emergency plan covers the cases of first aid for accident, agrochemical intoxication/exposure, earthquake, flooding, landslide, fire break/forest fire and spillage. First aid kit available with field supervisor (Mandor).</p>	<p>Comply</p>

		<p>Regular training concerning OHS and emergency procedures has been provided by Ukui Smallholder Management, e.g: last training on 20<sup>th</sup> April 2019, location in Club House Ukui Group, was attended by 62 participants. The record of attendance list, training material dan documentation available as evidences.</p>	
<p>6.7.3</p>	<p><b>(C)</b> Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p>	<p>Safe working practices have been established on document "SOP Alat Pelindung Diri" No: AA-SOP-OP- 101.3-R0.</p> <p>Training for all workers at estates and mills; including sprayers, fertilizer applicators, harvesters, FFB loading crew, upkeep workers, and mill process operators.</p> <p>PT Inti Indosawit Subur – Ukui Group provided adequate and appropriate protective equipment for all workers at place of works, in line with the risk assessment. Harvester completed with helmet, goggles, rubber boot and sickle cover. Sprayer gangs using goggles, respirators, apron, overall suit, gloves, and rubber boot. The protective equipment provided for free.</p> <p>Engine room operator wears helmet, ear plugs, mask, and safety shoes. Boiler operator using overall suit, goggles, respirator, hand glove and safety boot.</p> <p>Date verified of implementation of OHS program has demonstrated such as:</p> <ul style="list-style-type: none"> <li>- OHS license for electrical, no: Reg.3711/TK3-LIST/III/2018-P01, namely Mr Agus Prihatin – valid until 16<sup>th</sup> March 2021</li> <li>- OHS license for boiler operator, no: Reg.P.09.385.OPK3-PUBT-B.I/XI/2017, namely Mr Kusmiyanto, valid until 13<sup>th</sup> November 2022</li> <li>- OHS license for operator of overhead crane (class: III), no: Reg.P.09.982-OPK3-OC/XI/PAA/2017, namely Mr Marwan, valid until 24<sup>th</sup> November 2019.</li> <li>- OHS permit for Bakhoe Loader (2), number: DSTK/08/PAA/VI/2014. "Laporan Hasil Pemeriksaan dan Pengujian Pesawat Angkat Angkut (Bakhoe Loader) – no:</li> </ul>	<p>Nonconformity</p>

		<p>LHPP/JM/VII/1315/2019, dated 19<sup>th</sup> July 2019 – conducted by PT Jesindo Mandiri.</p> <ul style="list-style-type: none"> <li>– OHS license for “Instalasi Penyalur Petir”, registered no: 07/IP-P/PLLWN/2014, last inspection conducted on 19<sup>th</sup> July 2019 by PT Jesindo Mandiri, resistance is 4.39 Ohm.</li> <li>– OHS license for sterilizer no: M-11/3123, registration: 566/Sterilizer/Disnakertrans/0064/2012, last inspection dated 3<sup>rd</sup> August 2018 by PT Jesindo Mandiri (next inspection on 3<sup>rd</sup> August 2020). Result shown OK</li> <li>– Record of providing the PPE for all workers as per “Bukti Tanda Terima APD kepada Karyawan tahun 2019”, e.g: in workshop and operator in sterilizer and pressing station for month November 2019, e.g: safety gloves, ear plug, mask and safety shoes.</li> <li>– Special Medical Check-Up for operator in each station Ukui I POM, conducted by Focus Laboratory dated 22<sup>nd</sup> April 2019 – has attended by 104 workers. the result of MCU has communicated to related workers.</li> </ul> <p>However, during field visit at Block C89j Afdeling 3 Ukui Estate, auditor sighted two (2) FFB loader not use PPE during work. This is non-conformity raised for this indicator.</p> <p>Scheme Smallholders Ukui Group (sample: KUD Sumber Bahagia, KUD Karya Bersama and KUD Usaha Baru):</p> <p>Data verified:</p> <ul style="list-style-type: none"> <li>- Monitoring on using of PPE for harvester in KUD Usaha Tani (reported monthly), e.g: September, October and November 2019 reported OK in plot 150, 168 and 169.</li> <li>- “Berita Acara Penyediaan APD” – providing the PPE for harvester dated 5<sup>th</sup> April 2019, item: Helmet (110 pcs), egrek covers</li> </ul>	
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6.7.4	<p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work-related incidents leading to injury or sickness are covered in accordance with national law or by the unit of certification where national law does not offer protection.</p>	<p>PT Inti Indosawit Subur – Ukui Group have provided clinic for all workers. Referral are made to nearest hospital if there is case of severe/critical.</p> <p>The organization has also provided social and helath insurance in form of BPJS Ketenagakerjaan and BPJS Kesehatan – for all workers.</p> <p>Based on interview with sample workers in Ukui I POM and Ukui Estate there was confirmed that accident insurance (BPJS Ketenagakerjaan) and medical care insurance (BPJS Kesehatan) already covered. The sample workers able to demonstrated their insurance card onsite.</p> <p>Sampled worker holds Jamsostek/BPJS card. Payment made based on proportion from employee’ salary deduction and company’s levy, as per regulation.</p> <p>Data verified:</p> <ul style="list-style-type: none"> <li>– Ukui I POM: Billing statement of medical care (BPJS Kesehatan), amount to be paid IDR XX,850,500 number of employees covered 117 workers (number of dependent 304 persons), payment dated 10<sup>th</sup> October 2019</li> </ul>	Comply

		<ul style="list-style-type: none"> <li>- Electronic Payment System (e-payment) of BPJS Ketengakerjaan dated 14<sup>th</sup> November 2019, payment code 331510001935 amount IDR XX,128,775. Status: Paid.</li> <li>- Ukui Estate: e-payment of BPJS Ketenagakerjaan, payment code: 191200361758, amount paid IDR XX,742,492 has covered for 389 workers for period November 2019.</li> <li>- Ukui Estate: Billing Statemnt of medical care insurance dated 30<sup>th</sup> November 2019, amount to paid IDR XX,228,100 – number of employee covered 389 workers and total of dependent is 834 persons.</li> </ul> <p>Scheme Smallholders Ukui Group (sample: KUD Sumber Bahagia, KUD Karya Bersama and KUD Usaha Baru):</p> <p>Each cooperatives (KUD’s) provides contribution for the medical care should any worker/member had an accident. Kelompok Tani/farmer group has a cash saving and readily available to contribute for the medical care if accident case happens. Individual members basically will responsible if any work related accident occurs in their oil palm plot.</p> <p>Based on OHS injuries report, there were no incidents reported since January – November 2019</p>	
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	<p>PT Inti Indosawit Subur – Ukui I POM has shon the record of occupational injuries available year 20189under “Rekapitulasi Laporan Kecelakaan Kerja”</p> <p>Data seen:  Berita Acara Kecelakaan Kerja, dated 21<sup>st</sup> October 2019 – namely Mrs Hakim (harvester) – accidents during harvesting in Block C89h due to terkilir in feet.</p>	Comply

		<p>Scheme Smallholders Ukui Group (sample: KUD Sumber Bahagia, KUD Karya Bersama and KUD Usaha Baru):</p> <p>Record of Occupational injuries available for each KUD as per "Rekaman Kejadian Kecelakaan", was reported by pharamedist in Central Klinik (puskesmas), there were no incidents reported since January – November 2019</p>	
<p><b>Principle 7:</b>          Protect the environment, conserve biodiversity and ensure sustainable management of natural resources.</p>			
<p><b>Criteria 7.1:</b>          Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.</p>			
7.1.1	<p><b>(C)</b> IPM plans are implemented and monitored to ensure effective pest control.</p>	<p><b>Own Estates</b></p> <p>According to the Agricultural Policy Manual SOP AA-APM-OP-1100.10. R6 <i>Pengendalian Hama dan Penyakit</i> (Pests &amp; Disease Control), certificate holder has plan to implemented integrated pest management.</p> <p>According to the interview with pest control officer in Ukui Estate obtain information that management has had a schedule to regularly monitored pest attack (census) as follows:</p> <ul style="list-style-type: none"> <li>• Census of caterpillar/bag worm by monthly basis.</li> <li>• Census of <i>Ganoderma</i> annually.</li> <li>• Census rat infestation by recap the record of sortation in loading ramp.</li> <li>• Census of Barn Owl Box occupation in three monthly basis.</li> </ul> <p>The last census in Ukui Estate has been conducted in second week of November 2019. Result of census shows that pest attack still under control (below the economic threshold) which is limit 5%.</p>	Comply

		<p>Based on interview with census officer and field visit in early mature area in Ukui Estate (Block B16f Afdeling III) sighted no outbreak found. Condition in the ground are under control and well monitored. Certificate holder has used beneficial plant such as <i>Turnera subulata</i> and <i>Antigonon leptosus</i> (planted along side of main/collection road) in order the gathered natural predator of caterpillar/bagworm. Beneficial plant also propagated in nursery area.</p> <p>During the field visit, auditor also observe barn owl box in the ground. Estate manager informed that barn owl box has been installed with hectare covered 1:30 Ha (each owl box covered 30 Ha). Until this surveillance audit, there is 111 unit of barn owl box in Ukui Estate. According to the latest monitoring report on October 2019, all</p> <p><b>Scheme Smallholder:</b></p> <p>Based on field visit and interview with smallholder representatives from <i>KUD Sumber Bahagia, Karya Bersama and Usaha Baru</i> obtain information that they has been planted beneficial plant such as <i>Turnera subulata</i> and <i>Antigonon leptosus</i> as an early warning system in case of worm attack. They also installed barn own box (4 unit in each plot) to control rat population. All of this early warning system supported by the company.</p> <p>According to document verification, pest monitoring and control sighted pest management plan to conduct caterpillar/bag worm census in by monthly and barn owl box monitored in three monthly bases. Census was conducted by field supervisor that help by person that assign by board of KUD.</p> <p>During the field visit to the smallholder plot sighted no outbreak. All plot are in good condition and well maintained.</p>	
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7.1.2	Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.	The company only uses natural predators namely <i>Tyto alba</i> and <i>Sycanus dichotomus</i> in pest control efforts. Both predators are not recorded in invasive species according to the information listed on the website <a href="http://www.cabi.org">www.cabi.org</a> on in global invasive species database <a href="http://www.iucngisd.org/gisd/search.php">http://www.iucngisd.org/gisd/search.php</a> .	Comply
7.1.3	There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities. [For NI to define process]	Based on document verification, interview and field observation obtained information that there is no record use of fire for pest control.	Comply
<p><b>Criteria 7.2:</b>  Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.</p>			
7.2.1	<p><b>(C)</b> Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p>	<p>Based on the document verification and interview with management, obtain information that there is only pesticide usage for chemical weeding and pest control (if needed). Recommendation of pesticide used are refer to SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i> (Weed control) where explain the weeds type, weeding control methods and eradication, pesticide characteristic, and procedures of application (spraying volume, calibration, chemical weeding interval, target and sprayer maintenance).</p> <p>During the audit, found some pesticide list that usually used with active ingredients such as isopropyl amine glyphosate, fluoroksifir, methyl metsulfuron, triklofir, diuron, paraquat diklorida, diuron, lamda sihalotrin and dimetil amina. Certificate holder no longer using paraquat since 15 November 2019, according to the circular letter of Deputy Managing Director No. 008/DMD/MEMO/OCT/19 dated 22 October 2019.</p>	Comply



		<p>To reduce the human and environmental risk, there is some continuous action that has been implemented as follows:</p> <ul style="list-style-type: none"> <li>• Set up the pesticide rotation. For example, chemical weeding rotation is 4 times a year where the rotation in immature and early mature more often than mature and old palm.</li> <li>• Using the ultralow volume nozzle to minimize water consumption and reduce the risk for environment. During the field visit to the pesticide store sighted the micron herbi system knapsack as example.</li> <li>• Conducted regularly training for pesticide applicator and equipped them with appropriate PPE's.</li> <li>• Delaying the pesticide if weed or pest is under control. According to the interview with estate manager obtain information that the pesticide rotation can be delayed or reduced especially in mature or old palm where weeds/pest population are under control.</li> <li>• Minimalize contamination for pesticide applicator and their families by ensuring them to clean themselves before back home.</li> </ul>	
7.2.2	<b>(C)</b> Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.	Certificate holder has showed the record of LD50 calculation in each unit based on amount of pesticide used. For example, Ukui Estate has calculate the LD50 of each pesticide in a monthly bases.	Comply
7.2.3	<b>(C)</b> Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.	<p>Until this surveillance audit obtain information that there is no pesticide use for control pest attack. All of pesticide only using for weeding (herbicide).</p> <p>Based on interview with IPM supervisor and smallholder representatives known that no outbreak that causes pesticide usage.</p>	Comply

7.2.4	There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best	Based on document verification, interview and field observation obtained information that there is no prophylactic use of pesticides.	Comply
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 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	Based on goods in and goods out data in pesticide store, obtained information that the certificate holder used some kind of pesticide (different active ingredients). There is only <i>paraquat diklorida</i> that listed as WHO Class II (Moderately Hazardous). As described in this indicator, the company no longer using <i>paraquat diklorida</i> since November 2019.  There is no use of other pesticide class 1A and 1B until the audit.	Comply
	7.2.5b Why there is no other alternative which can be used	According to IPM procedures, certificate holder always using biological approach in order to monitoring pest attack. For example, estate using <i>Tyto alba</i> to monitoring rat infestation than using rodenticide.  To maintain ground condition especially weeding control, certificate holder has had a procedures SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i> (Weed Control). This procedures has set the specific pesticide in with minimum risk in accordance with the target.	
	7.2.5c Which process was applied to verify why there is no other less hazardous alternative	Certificate holder through Asian Agri's Research and Development Department has examined some pesticide in specific target. The result of examination and pesticide recommendation written in the SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i> (Weed Control).	

	<p>7.2.5d What is the process to limit the negative impacts of the application</p>	<p>SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i> (Weed Control) has set some procedures to reduce negative impact of the application as follows:</p> <ul style="list-style-type: none"> <li>• Pesticide/herbicide selection to ensuring the application is effective.</li> <li>• Set up the appropriate nozzle in chemical weeding activity based on weed type, topography and availability of water.</li> <li>• Regularly spraying calibration to ensuring the application is effective and efficient.</li> <li>• Calculate pesticide/herbicide usage based on target (hectarage and weed type).</li> <li>• Spraying technic.</li> </ul>	
	<p>7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</p>	<p>Certificate holder did not using pesticide to eradicated pest without the outbreak. If any census result shows the pest attack almost reach the economical threshold, they usually conducted campaign test using pesticide if needed.</p> <p>Chemical weeding activity has regularly set by management. For example, normally circle, path and collecting point weeding conducted 4 times a year in immature and mature area. It rotation can be reduced in line with the palm ages.</p>	
<p>7.2.6</p>	<p><b>(C)</b> Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p>	<p>Certificate holder has assign chemical weeding team (<i>Tim Unit Semprot/TUS</i>) in each estate/unit to handling chemical weeding activity. The team member originated from own workers (for own estate) and local communities (for smallholder). They regularly attended training on pesticide handling that conducted by the pesticide supplier in collaboration with local pesticide committee.</p> <p>Based on document review and interview with random pesticide applicator known that they were attending the last training on pesticide handling on 24 May 2019. Some topic that discuss such as safety pesticide handling, national regulation related to pesticide, symbol and label awareness and emergency procedure if any</p>	<p>Comply</p>

		<p>contamination or poisonous. The worker can described purpose of PPE usage, attending regularly medical check and safety working procedures.</p> <p>During the audit, auditor also interviewed some smallholder representatives and obtain information that the company has provide training session for them on how to handling pesticide safely. For example, pesticide applicator shall use appropriate PPE during application, no smoke, avoid the direction of wind blows and cleaned their body after application to reduce contamination.</p>	
7.2.7	<b>(C)</b> Storage of all pesticides is in accordance with recognised best practices.	<p><b>Ukui Estate:</b></p> <p>SOP for pesticide storage has been provided in SOP "Pengangkutan dan Penyimpanan Bahan Kimia AA-KL-03-EFP" dated 1 February 2008. Pesticides are stored in the determined area separated from fertiliser and other chemicals. Pesticides storage is provided in Estate as well as in central storage. Agrochemicals storage is locked areas with limited access. The storage is ventilated. MSDS and hazard symbol label are provided nearby of pesticides. Emergency shower and eyewash are also provided to anticipate in case of an emergency of agrochemical handling. PPE for handling of pesticides are provided including boots, apron, safety glass, respiratory mask and hand gloves. The possible spill is managed. Secondary containment is provided around the pesticides storage area. Spill kit is also provided in the area.</p> <p>During field visit and observation to Agrochemical/Pesticide Storage at Traksi, storage of pesticides found to be in accordance with hazard identification and risk assessment and national guideline for limited pesticide use. Empty chemical containers had been used for mixing chemicals for spraying pesticides in the field.</p> <p>The management of waste material from empty pesticide container disposed through hazardous waste store as per procedure "Penanganan Limbah Industri B-3 AA-KL-06-EFP" dated 1 November 2008. The company has temporary hazardous waste storage where all hazardous waste from all estates and mills collected. The storage has obtain the license as per "Keputusan Kepala Badan Penanaman Modal dan</p>	Comply

		<p>Pelayanan Perizinan Terpadu Kabupaten pelalawan Nomor: KPTS.503/BPMP2T-PLY/18/2015 Tentang Izin pengelolaan Limbah Bahan Berbahaya dan Beracun (B3) Untuk Kegiatan Penyimpanan Sementara Limbah B3 kepada PT Inti Indosawit Subur Ukui” dated 29 December 2015 valid until 29 December 2020. Storage keeper maintains the balance of incoming and outgoing hazardous waste. Hazardous wastes were sent to licensed contractor PT Shalli Riau Lestari for appropriate disposal.</p> <p><b>Ukui Smallholder:</b></p> <p>Ukui Smallholder management has ensure that all agrochemical usage and chemical weeding including pest and disease management was performed by PT Inti Indosawit Subur. PT Inti Indosawit Subur has prepared the procedure for handling all pesticide containers, as per “Penanganan Limbah Bahan Berbahaya Beraacun”, No AA-KL-06-EFP revision 06, dated 1 August 2015. Safe Work Procedure on chemical storage, mixing and disposal that covered PPE, safe working procedure, handling of chemical, storage, chemical mixing and the disposal.</p> <p>Storage of pesticides found to be in accordance with hazard identification and risk assessment and national guideline for limited pesticide use. Empty chemical containers had been used for mixing chemicals for spraying pesticides in the field.</p>	
7.2.8	All pesticide containers are properly disposed of and/or handled responsibly if used for other purposes.	<p><b>Ukui Estate:</b></p> <p>All pesticide container are disposed to Temporary hazardous waste storage according to “SOP Pengangkutan dan Penyimpanan Bahan Kimia AA-KL-02-EFP” dated 1 February 2008.</p> <p>Ex pesticide container from estate sent to TPS LB3 with note as per “Catatan Serah Terima Limbah B3”. Sample seen:</p> <ul style="list-style-type: none"> <li>- “Catatan Serah Terima Limbah B3” No. TPS/KUK/560 dated 16 July 2019, item: Ex Pesticide container as much as 15 kg, Deliver by Rudi H and receipt by Junaidi (Operator TPS LB3).</li> </ul>	Comply

		<p>- "Catatan Serah Terima Limbah B3" No. TPS/KUK/559 dated 14 July 2019, item: Ex Pesticide container as much as 18 kg, Deliver by Rudi H and receipt by Junaidi (Operator TPS LB3).</p> <p>During field visit to TPS LB3 (temporary hazardous waste storage) shown that all pesticide container are in place in the specific area completed with symbol and label. All pesticide container and other hazardous waste are store for maximum 6 month according to licence TPS LB3 and sent to licensed contractor PT Shalli Riau Lestari for appropriate disposal.</p> <p>Hazardous waste delivery were completed with Manifest as per "Dokumen Limbah B3 (Hazardous Waste Manifest)". Latest delivery of Hazardous waste including ex pesticide container was done on 9 October 2019. Record of hazardous waste manifest available in "Manifest Nomor AAO0014638" dated 09 October 2019, item: Used rgas, Ex pesticide container, volume: 736 kg, Vehicle No. BM 8431 JU, Transporter: PT Shali Riau Lestari, PIC: Sondang Hakim S.</p>	
7.2.9	<p><b>(C)</b> Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.</p>	<p>Based on interview, field visit and observation confirmed that there is no aerial spraying pesticide performed by PT IIS – Ukui Estate.</p>	Comply
7.2.10	<p><b>(C)</b> Specific annual medical surveillane for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p>	<p>PT Inti Indosawit Subur - Ukui 1 POM provides 6-monthly medical check up for workers performing agrochemical spraying. The medical check up covers blood test, urine test, cholinesterase test, and spirometric test.</p> <p>Scheme Smallholders Ukui Group (sample: KUD Sumber Bahagia, KUD Karya Bersama and KUD Usaha Baru):</p> <p>Spraying works are conducted by TUS from company workers. Company provides 6-monthly medical check-up for workers performing agrochemical spraying. The</p>	Comply

		<p>medical check-up covers blood test, urine test, cholinesterase test, and spirometry test.</p> <p>Data verified:</p> <p>Record of Medical (every six months) available under "Laporan Rekapitulasi Hasil Medical Check-Up Inti Indosawit Subur – Plasma, dated 22th April 2019 was conducted by Focus Clinical Laboratory in Pekanbaru. These MCU was attended by all workers of sprayers (TUS – tim unit semprot), e.g: Mrs Sri Wahyuni, Mrs Jumiah, Mrs Mayrianti, Mrs Sitimas Kurroh, Mrs Sari, Mrs Kunik, Mrs Lia, Mrs Susi, Mrs Selly, Mr Gilang, Mr Zen Ahmadian (supervisor)</p>	
7.2.11	<p><b>(C)</b> No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.</p>	<p>PT Inti Indosawit Ukui - Group has prepared the mechanism to ensure that spraying is not conducted by pregnant or breast-feeding women by PP test and monitoring checklist (monthly), data seen: "Monitoring Cek Kehamilan Pekerja Semprot di PT Inti Indosawit Subur – Ukui I POM" since July to November 2019 there were no workers in pregnant condition (negative result),</p> <p>Scheme Smallholders Ukui Group (sample: KUD Sumber Bahagia, KUD Karya Bersama and KUD Usaha Baru):</p> <p>Checklist on monitoring of pregnancy (monthly), for period January to December 2019, there were reported no workers in pregnant condition (negative detection), e.g: Mrs Sri Wahyuni, Mrs Jumiah, Mrs Mayrianti, Mrs Sitimas Kurroh, Mrs Sari, Mrs Kunik, Mrs Lia, Mrs Susi, Mrs Selly</p>	Comply
<p><b>Criteria 7.3:</b>  Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.</p>			
7.3.1	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based</p>	<p><b>Ukui POM &amp; Estate:</b></p>	Comply

	<p>on toxicity and hazardous characteristics, is documented and implemented.</p>	<p>The company has developed hazardous waste management plan, including infectious waste from clinic. The hazardous waste collected in temporary storage and disposed off through licensed contractor/transporter. The Company has a MoU with PT Shalli Riau Lestari for transporting and collecting hazardous waste and medical waste as per "Perjanjian Kerjasama Pengelolaan Limbah B3 No. 049/SRL-PKU/MOU/III/2019" dated 12/03/2019. Transporter also has cooperation with licenced contractor to processing hazardous waste, namely PT Wastec International (for medical waste), Non Ferindo Utama (for Used battery) and PT Prasadha Pamunah Limbah Industri (all hazardous waste except medical waste).</p> <p>Waste and pollution sources have been identified and documented, including used lubricant and filter, old battery, used laboratory chemical, clinical/medical waste, mill effluent, EFB, smoke, dust, fiber and shell, empty agrochemical container, boiler ash, scrap iron, used tires, waste water and domestic household refuse. Record of identification was presented in "Evaluasi Aspek Dampak Lingkungan EMS-431-003-LT" latest updated on February 2019. Waste management in particular of hazardous waste was documented in "Neraca Limbah B3" which reported to Environmental Agency Office each quarter.</p> <p>The company started at the beginning this year to re-cycle anorganic waste where the company built the waste storage.</p> <p><b>Ukui Smallholder:</b></p> <p>Smallholder Manager has developed mechanism of domestic waste management. The mechanism has disseminated to all KUD, KT and member. Domestic waste management perform by segregating organic and inorganic waste. Organic waste used as composting and inorganic waste was selected by type of waste such as: paper and plastic waste collected and deliver to collector, glass and steel was collected and delivere to PT IIS waste storage and other inorganic waste deliver to final sanitary landfill.</p>	
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		<p>Ukui Smallholder has defined the procedure "Pengelolaan Kemasan Ex (Bekas) Pupuk di Kebun" No. 035/DOK/SOP/PT.IIS KLU-AA/2016 dated 2 December 2016. Socialization of procedure to smallholder has regularly delivered, latest socialization conducted on 19 October 2019 to all representative of KUD, WKWK, and KT.</p> <p>All ex fertilizer sack was prohibited to dispose in plantation and housing area. All the ex fertilizer sack usage must be identified and report to Ukui Smallholder Manager. Ex fertilizer sack were triple rinsed and reused as loosefruit sack and the innerbag plastic is deliver to collector.</p> <p>Smallholder manager has monitored the usage of ex fertilizer sack in Plasma Ukui each month. The monitoring record were evident in "Monitoring Penggunaan Bekas Karung Pupuk untuk Tempat Brondolan" period January – November 2019 (KUD Sumber Bahagia, KUD Karya Bersama and KUD Usaha Baru). All ex fertilizer sack at Plasama ukui are controlled and monitor to prevent the negative impact to environment.</p>	
7.3.2	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p>	<p><b>Ukui I POM &amp; Estate:</b></p> <p>Waste material dispose according to company procedure. Below are the procedure to disposal of waste material:</p> <ul style="list-style-type: none"> <li>- "SOP Penanganan Sampah Industri Non B3 AA-KL-05-EFP" dated 1 February 2008. The procedure stipulated the disposal of waste material non hazardous waste, covering: Ex chemical non hazardous waste, ex fertilizer sack, ex equipment, ex praepart, scrap, used polybag, used hose, empty bunch, fibre, shell, solid, ash.</li> <li>- "SOP Penanganan Limbah Bahan Berbahaya dan Beracun (Limbah B3) AA-KL-06-EFP, dated 22 April 2016. The procedure stipulated the hazardous waste handling according to national regulation and best practises.</li> <li>- "SOP Penanganan Limbah Medis AA-KL-07-EFP" dated 5 April 2017. Procedure stipulated the medical waste handling, treat as hazardous waste.</li> </ul>	Comply

		<ul style="list-style-type: none"> <li>- "SOP Penanganan Limbah Laboratorium AA-KL-11-EFP" dated 15 November 2008. Procedure stipulated the handling of waste generated from mill laboratory, mostly treat as hazardous waste.</li> </ul> <p>Waste material dispose according to company procedure. Solid waste from Ukui I POM such as: Fiber and Shell are used as Boiler fuel, while liquid waste water are use as Land Application to the plantatiuon (as organic fertilizer). Hazardous waste at Ukui I POM handling by deliver to Ukui Estate Temporary hazardous waste. Hazardous waste delivery evident in "Catatan Serah Terima Limbah B3"</p> <ul style="list-style-type: none"> <li>- Catatan Serah Terima Limbah B3 No. TPS/KUK/620 dated 4 December 2019, waste handover from Ukui I POM to TPS LB3 Ukui Estate including: Bram bubutan 440 kg, Ex Jerycan 30 kg, Ex paint container 28 kg, ex chemical container 32 kg. Document completed with "Surat Keterangan Jalan" dated 4 December 2019, signed by Mill manager.</li> <li>- Catatan Serah Terima Limbah B3 No. TPS/KUK/587 dated 4 December 2019, waste handover from Ukui I POM to TPS LB3 Ukui Estate including: used oil 700 kg, ex paint container 56 kg, used lamp 10 kg, used electronic 68 kg, used oil drum 6 pcs. Document completed with "Surat Keterangan Jalan" dated 3 October 2019, signed by Mill manager.</li> </ul> <p>Hazardous waste handling by deliver to Ukui Estate Temporary hazardous waste. Hazardous waste handover evident in "Catatan Serah Terima Limbah B3". Sample seen:</p> <ul style="list-style-type: none"> <li>- Catatan Serah Terima Limbah B3 No. TPS/KUK/577 dated 24 August 2019, waste handover from Traksi to TPS LB3 including: Used Oil 27 kg, used oil filter 1 kg.</li> <li>- Catatan Serah Terima Limbah B3 No. No. TPS/KUK/576 dated 22 August 2019, waste handover from Agrochemical storage including: Ex Herbicide Jerycan 12 kg, Ex pesticide container 13 kg.</li> </ul> <p>Domestic waste (anorganic waste) generated from emplacement (workers housing) were deliver to "Dinas Pasar dan Kebersihan Pasar". The waste was collect and transported by Dinas Kebersihan Pasar each month as per "Berita Acara</p>	
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		<p>Pengangkutan Sampah Rumah Tangga Karyawan Group Ukui ke Dinas Pasar dan Kebersihan Pasar Kecamatan Ukui". Sample seen for delivery period on October – December 2019 were evident.</p> <p><b>Ukui Smallholder:</b></p> <p>KUD Bakti has own TUS team and covered KUD Sumber Makmur and KUD Karya Bersama. All waste or ex Pesticide container are deliver to TPS LB3 Ukui Estate as per "Catatan Serah TErima Limbah B3". Sample seen:</p> <ul style="list-style-type: none"> <li>- Catatan serah terima Limbah B3 No. TPS/KUK/592 dated 5 October 2019, consist of: ex Glifosat Jerycan 5 kg (3 pcs), ex pesticide container (kenrane, metsulindo) 3 kg.</li> <li>- Berita Acara Serah Terima Limbah B3 Kebun Plasma Ukui – KUD Bakti dated 5 October 2019, consist of ex jerycan Glifosat 2 pcs, ex container kenrane 15 pcs and ex metsulindo container 20 pcs.</li> </ul> <p>Smallholder manager has monitored the usage of ex fertilizer sack in Plasma Ukui each month. The monitoring record were evident in "Monitoring Penggunaan Bekas Karung Pupuk untuk Tempat Brondolan" period January – November 2019 (KUD Sumber Bahagia, KUD Karya Bersama and KUD Usaha Baru). All ex fertilizer sack at Plasma ukui are controlled and monitor to prevent the negative impact to environment.</p>	
7.3.3	The unit of certification does not use open fire for waste disposal.	PT Inti Indosawit Subur – Ukui Group are not use open fire for waste disposal. As described above, all waste generated from all activity at plantation and mill categorized as : organic waste (solid & liquid), anorganic waste, medical waste, laboratory waste, hazardlus waste. All waste are disposed according to the procedure as described in indicator 7.3.2 without any open fire.	Comply
<p><b>Criteria 7.4:</b>  Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.</p>			

7.4.1	Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.	<p><b>Own Estates</b></p> <p>Both own estate and smallholder has had the procedure related to manage soil fertility (see detail in indicator 3.3.1). The implementation of manuring is based on fertilizer recommendation that set by Asian Agri's Research and Development Department. Fertilizer dosage has set according to the soil needed refer to SSU/LSU.</p> <p>Based on interview with manuring team in Block D98e Ukui Estate obtain information that they has been trained to not applied fertilizer in riparian or water source to minimize environmental impact. Other sample is land application in Block C89h Ukui Estate where the land application officer shall ensure and control the effluent only applied in flatbed. The application out of flatbed area strictly prohibited.</p> <p><b>Scheme Smallholder:</b></p> <p>Based on interview with smallholder representatives obtain information that they only using fertilizer according to the recommendation from Asian Agri's Research and Development Department. No fertilizer applied in riparian area to minimize environmental impact.</p>	Comply
7.4.2	Periodic tissue and soil sampling is carried out to monitor and manage changes in soil fertility and plant health.	<p>According to the Asian Agri's agricultural policy, soil sampling conducted every 5 years while leaf sampling conducted annually. Based on document verification sighted the report of soil and leaf sampling in own estate and smallholders as follows:</p> <ul style="list-style-type: none"> <li>• The last soil sampling conducted on June 2016. Parameter that tested is N, C, K, Ca, Mg and pH.</li> <li>• The last leaf sampling conducted on July 2019. Parameter that tested is major element (Ash, N, P, K Mg, Ca) dan Minor element (B, Cu, Zn, Mn, Fe).</li> </ul>	Comply

		Those report is converted to be fertilizer recommendation by Asian Agri's Research and Development Department.	
7.4.3	A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.	<p><b>Own Estates</b></p> <p>According to the Agricultural Policy Manual, certificate holder has had a guidance in organic fertilizers such as Empty Fruit Bunch (EFB) and Palm Oil Mill Effluent (POME). Certificate holder has implemented EFB application in estate with dosage 30 – 50 ton/Ha in normal soil and POME with dosage 750 m3/Ha only Ukui Estate which is near the Ukui I mill.</p> <p>During the audit, auditor has observe the implementation of EFB application EFB Application, Block C89i and POME in Block C89h Ukui Estate. Based on document verification, until November 2019, Block C89h has been applied 37 tonnes/Ha. Due to low volume of the POME from mill caused the total of POME applied not met the dosage until now.</p> <p><b>Scheme Smallholder:</b></p> <p>According to the interview with smallholder representatives, there is no longer EFB application at this time since their area include in replanting plan on 2020 and 2021.</p>	Comply
7.4.4	Records of fertiliser inputs are maintained.	<p>Record of fertilizer application in each estates are in places. For example,</p> <ul style="list-style-type: none"> <li>• There is a record of Rock Phosphate application in D98e with dosage 0.75 kg/palm in fertilizer supervisor daily report.</li> <li>• There is a record of ZA application in KUD Usaha Tani Plot No 160 with dosage 4.30 kg/palm in progress report of smallholder owners book.</li> </ul>	Comply
<b>Criteria 7.5:</b>			

Practices minimise and control erosion and degradation of soils.			
7.5.1	<p><b>(C)</b> Maps identifying marginal and fragile soils, including steep terrain, are available.</p>	<p><b>Own Estates</b></p> <p>Asian Agri's Research and Development Department has conducted soil survey semi detail in PT Inti Indosawit Subur (Ukui Estate) on 2010. Based on the report found the soil taxonomy refer to USDA 2006 as follows:</p> <ul style="list-style-type: none"> <li>• Typic Dystrudepts (72.1% from the total area)</li> <li>• Typic Endoaquepts (24.5% from the total area)</li> <li>• Typic Placaquods (2.5% from the total area)</li> <li>• Typic Haplosaprist (0.9% from the total area)</li> </ul> <p>Topography:</p> <ul style="list-style-type: none"> <li>• Flat – undulating (0 – 8%) → 15.15% from the total area</li> <li>• Rolling (8 – 15%) → 36.29% from the total area</li> <li>• Rolling - Hilly (15 – 30%) → 45.68% from the total area</li> <li>• Steep (&gt;30%) → 2.88% from the total area</li> </ul> <p>Based on field visit in Ukui Estate sighted ground management in steep area as follows:</p> <ul style="list-style-type: none"> <li>• Terracing in contour area.</li> <li>• Frond stacking alongside the contour.</li> <li>• No chemical in <i>Neprolephis bisserata</i>.</li> <li>• EFB application.</li> </ul> <p><b>Scheme Smallholder:</b></p>	Comply

		<p>Asian Agri's Research and Development Department has conducted soil survey semi detail in Smallholder Area of PT Inti Indosawit Subur on 2010. Based on the report found the soil taxonomy refer to USDA 2006 as follows:</p> <ul style="list-style-type: none"> <li>• Typic Dystrudepts (49.26% from the total area)</li> <li>• Typic Endoaquepts (46.71 % from the total area)</li> <li>• Typic Haplosaprist (4.03% from the total area)</li> </ul> <p>Soil topography:</p> <ul style="list-style-type: none"> <li>• Flat – undulating (0 – 8%) → 58.83% from the total area</li> <li>• Rolling (8 – 15%) → 7.06% from the total area</li> <li>• Rolling - Hilly (15 – 30%) → 34.11% from the total area</li> </ul> <p>These map are available in each unit.</p>	
7.5.2	There is no extensive replanting of oil palm on steep terrain.	Based and document verification and field observation, there is no extensive replanting activity in steep terrain both own estate or smallholder area.	Comply
7.5.3	There is no new planting of oil palm on steep terrain.	According to the interview with estate manager as company representative, there is no new planting plan in own estate or smallholder area.	Comply
<p><b>Criteria 7.6:</b>          Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.</p>			
7.6.1	<b>(C)</b> To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils,	Certificate holder through Agri Agri's Research and Development Department has conducted soil mapping 2010. They also had SOP AA-APM-OP-1100.05-R3 dated 23	Comply

	including steep terrain, are taken into account in plans and operations.	November 2016: <i>Konservasi Tanah dan Air</i> (Soil & Water Conservation) as guidance for soil conservation in each topography  During this audit, auditor has been confirmed that there is no new planting (land extension) of PT Inti Indosawit Subur or plasma area. It is only replanting activity that conducted in 2015.	
7.6.2	Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.	During this audit, auditor has been confirmed that there is no new planting (land extension) of PT Inti Indosawit Subur or plasma area. It is only replanting activity that conducted in 2015. Replanting activity in steep area using a terrace contour for soil conservation.	Comply
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	During this audit, auditor has been confirmed that there is no new planting (land extension) of PT Inti Indosawit Subur or plasma area. It is only replanting activity that conducted in 2015. Replanting activity in steep area using a terrace contour for soil conservation.	Comply
<b>Criteria 7.7</b> No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	<b>(C)</b> There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.	Based on Semi Detail Soil Map scale 1:25,000, there is no peat soil in Ukui Estate and Ukui Plasma area. There are 4 types of soil in Ukui Estate and Plasma Ukui area, namely: 1. Typic Dystrudepts 2. Typic Endoaquepts 3. Typic Haplosaprists 4. Typic Placaquods	Comply



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		<p>Soil survey semi detail has been carried out by Research and Development Department Asian Agri. According to result of soil survey analysis report dated 27/05/2019, sample seen:</p> <ul style="list-style-type: none"> <li>- Division I, Block A88f/1988, landform: hilly, Material: sandstone and batu liat, Topography 8 - 15%, humidity regim: Udik, temperature regim: Isohipetermik, Drainage clas: good, effective solum: 120 cm, ground water &gt;150 cm.</li> <li>- Division II, Block B89f/1989, landform: hilly, Material: sandstone and batu liat, Topography 15-30%, humidity regim: Udik, temperature regim: Isohipetermik, Drainage clas: good, effective solum: 100 cm, ground water &gt;150 cm.</li> <li>- Division III, Block C89b/1989, lanform: dataran/flat, Material: sandstone and batu liat, topography 0 – 8 %, humidity regim: Isohipertermik, drainage: good, solum 120 cm, ground water &gt;150 cm.</li> </ul> <p>Division IV, Block D89d/1989, landform: hilly, Material: sandstone and batu liat, Topography &gt;30%, humidity regim: Udik, temperature regim: Isohipetermik, Drainage clas: good, effective solum: 120 cm, ground water &gt;150 cm.</p>	
7.7.2	Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat.	According to soil map semi detail scale 1:25,000 and also verified during field visit, confirmed that there is no peat soil at area Ukui Estate and Ukui Plasma.	Comply
<p><b>PROCEDURAL NOTE:</b> Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).</p>			
7.7.3	<b>(C)</b> Subsidence of peat is monitored, documented and minimised.	According to soil map semi detail scale 1:25,000 and also verified during field visit, confirmed that there is no peat soil at area Ukui Estate and Ukui Plasma.	Comply
7.7.4	<b>(C)</b> A documented water and ground cover management programme is in place.	According to soil map semi detail scale 1:25,000 and also verified during field visit, confirmed that there is no peat soil at area Ukui Estate and Ukui Plasma.	Comply

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7.7.5	<p><b>(C)</b> For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p>	<p>According to soil map semi detail scale 1:25,000 and also verified during field visit, confirmed that there is no peat soil at area Ukui Estate and Ukui Plasma.</p>	Comply
<p><b>PROCEDURAL NOTE:</b> Full details of the RSPO Drainability Assessment Guidelines and related concepts and detailed actions are in the manual currently being fine-tuned/tested by PLWG. A final version should be approved by PLWG in January 2019 and will include additional guidance on the steps to be followed after the decision not to replant as well as implications for other stakeholders, smallholders, local communities and the unit of certification. It is recommended that a further twelve-month methodology trial period is proposed for all related management units (i.e. those with plantations on peat) to utilise the methodology and provide feedback to the PLWG to enable further refinement of procedure as appropriate before January 2020. Units of certification have the option to defer replanting till after the availability of the revised guidelines. Additional guidance on alternative crops and rehabilitation of natural vegetation will be provided by PLWG.</p> <p><b>PROCEDURAL NOTE:</b>          PLWG and the Smallholder Interim Group (SHIG) will collaboratively develop guidance for Independent Smallholders [cross links to SHIG and GHG issues].</p>			
7.7.6	<p><b>(C)</b> All existing plantings on peat are managed according to the RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat, version 2 (2018) and associated audit guidance.</p>	<p>According to soil map semi detail scale 1:25,000 and also verified during field visit, confirmed that there is no peat soil at area Ukui Estate and Ukui Plasma.</p>	Comply

7.7.7	<p><b>(C)</b> All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as “peatland conservation areas”; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the ‘RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat’, version 2 (2018) and associated audit guidance.</p>	<p>According to soil map semi detail scale 1:25,000 and also verified during field visit, confirmed that there is no peat soil at area Ukui Estate and Ukui Plasma.</p>	Comply
<p><b>Criteria 7.8</b>  Practices maintain the quality and availability of surface and groundwater.</p>			
7.8.1	<p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:  7.8.1a The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p>	<p><b>Ukui I POM &amp; Ukui Estate:</b>  Water management at Estate has been performed by protection the source of water, use the water according to necessity and monitoring the water quality (surface and ground water). Company has “SOP Pengelolaan Sempadan AA-AMP-OP-1100.21-R1” dated 01/12/2014, as guidance to preserve riparian during replanting. The procedure covers identification of such conservation area (river buffer zone, water catchment area, lake buffer zone, spring buffer zone). Point 6.2.4 and 6.2.5 explains during replanting, non-productive plant within buffer zone will be left as it is, but no chemical regime should applied. Enrichment with native tree species.  Water source management: Identification of water source and wetland, as indicated in HCV report 2010. The water source identified mill’s water reservoir and river (Napuh tributary, Air Hitam Kanan river and Air Hitam Kiri river). Policy to prohibit chemical application in riparian zone. Policy to prohibit fish poisoning and prohibit wood felling in area of company plantation.  Monitoring of water quality performed each semester by PT Inti Indosawit Subur – Ukui Estate including waste water generated from housing area and workshop. Water and waste water analyzed by accredited laboratory “UPT Laboratorium Bahan</p>	Comply

		<p>Konstruksi Dinas Pekerjaan Umum dan Tata Ruang Provinsi Riau". Sample seen on Clean Water analysis (Ground Water) at housing Ukui Estate dated 13/06/2019, Report of analysis no. MT.1/01.06.60.76, standard refer to PermenKes No. 492/MENKES/PER/IX/2010, analysis result shown that all parameter analyzed are met with the standard regulation.</p> <p>Surface water analysis has been done on 5/03/2019 by accredited laboratory "UPT Laboratorium Bahan Konstruksi Dinas Pekerjaan Umum dan Tata Ruang Provinsi Riau". Report of analysis no. MT.1/03.06.79.176, standard refer to PP No. 82 Tahun 2001, analysis result shown that all parameter analyzed are met with the standard regulation.</p> <p>PT Inti Indosawit Subur are not restrict access to clean water or contribute to pollution of water used by communities.</p> <p><b>Scheme Smallholder:</b></p> <p>Plasma Ukui Group ha policy to prohibit chemical application near to water course 3 m from left and right side of waterways as per Circular letter "</p> <p>The policy has been disseminated to smallholder member and TUS team on 19 October 2019 as per "Notulen pelatihan Konservasi Tanah dan Air".</p>	
	<p>7.8.1b Workers have adequate access to clean water.</p>	<p><b>Ukui I POM &amp; Estate:</b></p> <p>Company provide the clean water for workers at housing area with ground water (drill well) at Ukui Estate and clean water from Mill for Mill workers Housing. Regular water analysis was performed to monitor the water quality. Water analysis performed by accredited laboratory "UPT Laboratorium Bahan Konstruksi Dinas Pekerjaan Umum dan Tata Ruang Provinsi Riau". Sample seen on Clean Water analysis (Ground Water) at housing Ukui Estate dated 13/06/2019, Report of analysis no. MT.1/01.06.60.76, standard refer to PermenKes No. 492/MENKES/PER/IX/2010, analysis result shown that all parameter analyzed are met with the standard regulation.</p>	

		<p>During interview with sampled workers (harvester, spraying workers, mill workers and office workers) confirmed that they got clean water freely which provide by Estate and Mill.</p> <p><b>Scheme Smallholder:</b></p> <p>Most of the smallholder member including the workers are stay in their own housing at the village (SP). Most of the smallholder member using the river water for daily activity (washing &amp; toilet) and ground water for clean water. In addition in the village there are many agent provide the clean water in the water gallon.</p>	
7.8.2	<p><b>(C)</b> Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017).</p>	<p><b>Ukui I POM &amp; Estate:</b></p> <p>PT Inti Indosawit Subur – Ukui I POM and Estate has establish the procedure "Pengelolaan Riparian AA-APM-OP-1100.21-R2 dated 7 December 2015. The procedure defined the criteria of riparian area, lake, spring water and protected area. Each river determined the riparian zone 50 m on the left and right side the river with wide &lt; 12 m and 100 m for the river which wide &gt;12 m. All riparian zone was sign by boundary poles and signboard. Riparian restoration performed in the critical/degraded area to enhance and rehabilitate the ecosystem. When the replanting activity performed, it was prohibit to conducted land preparation/clearing in riparian area. During field visit at "Anak Sungai Napuh River" Block B16K Afdeling II it can be demonstrated that in the riparian area there is no replanting activity. Protection of riparian areas also performed with no chemical crops care activities both fertilizer and herbicide spraying.</p> <p>Ukui Estate has a program to restoring riparian by planting natural vegetation, such as: Pheronema canescens, Hibiscus sp, Terminalia cattap[a, Dimocarpus longan, Buah saga, etc. Total vegetation planting in 2019 was 300 plant as per "Monitoring Penanaman Anakan Alam".</p>	Comply

		<p><b>Ukui Smallholder:</b></p> <p>Riparian Protection was established and described about buffer zone, riparian buffer and natural river. Plasma Ukui I has a procedure to maintain and conserve the riparian under procedure "Restorasi Riparian dan Areal Disekitar Danau/Waduk atau Mata Air Lainnya AA-KL-12-EFP".</p> <p>Management of Ukui Plasma has conducted dissemination to farmer members related HCV, soil and water conservation, and good agriculture practice. Dissemination material was evident; HCV, soil and water conservation was focused on fertilizer and agrochemical application near the waterways; good agriculture practice focused on spraying activity must performed by TUS team from company worker and cannot be done by farmer themselves, prohibition of blanket spraying, FFB ripeness criteria, loose-fruit picking and importance of PPE. Dissemination held to members of KUD on 31 January 2018, attended by 25 participants.</p> <p>Management of Ukui Plasma has installed signboard "Batas Semprot" (spraying boundary) at minimum 3 meters from waterways. There are 2 type of signboard, which is (1) Prohibition of fertilizer and agrochemical application at &lt; 3 meters from waterways; and (2) signboard to mark the boundary area. Plasma Ukui also has marking the boundary of riparian area by painting the tree.</p> <p>Management of Ukui Plasma has installed erosion anchor, made pile and planted "waru" (<i>Hibiscus similis</i>) and "ketapang" (<i>Terminalia catappa</i>) tree at the side of waterways.</p> <p>Management of Ukui Plasma conducted monitoring of kavling (smallholder area) condition regarding weed condition, spraying results, waterways boundary, signboard condition, and condition of vegetation as erosion anchor. Records of monitoring presented in document "Monitoring Pemeriksaan Kavling Petani". During visit, result of monitoring can be demonstrated.</p>	
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7.8.3	<p>Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.</p>	<p><b>Ukui I POM:</b></p> <p>Ukui I Palm Oil Mill has an effluent treatment through treated ponds system. There were 10 ponds system consist of 1 Coolling Pond capacity 12,000 m<sup>3</sup>, 2 Primary Anaerobic pond capacity 30,000 m<sup>3</sup>, 2 Secondary Anaerobic pond cappacity 26,000 m<sup>3</sup>, 1 Acidification pond capacity 5,000 m<sup>3</sup>, and 4 buffering pond with total capacity 35,400 m<sup>3</sup>.</p> <p>Company has permit to apply waste water to land application at plantation as per "Keputusan Kepala Dinas Penanaman Modal dan Pelayanan Terpadu Satu Pintu Kab. Pelalawan Nomor: 503/DPMPPTSP-LA/2019/06 Tentang Izin Pemanfaatan Air Limbah Kepada PT Inti Indosawit Subur PMKS Ukui I" dated 26 August 2019 valid until 5 years after issuance.</p> <p>Quality of waste water effluent is monitored monthly in line with the requirements of regulation Kep Men LH No.29/2003. The result of POME monitoring was reviewed including measurement of BOD for period January – October 2019. The Ministry of Environment Decree #29/2003 and permit of land application required that BOD of POME flowed to land application is less than 5,000 mg/litre and pH 6 - 9. The result of POME quality during this period was BOD less than 5,000 mg/litre and pH between 6 and 9. Below are the BOD and pH measured for period January – October 2019:</p> <table border="1" data-bbox="896 1021 1601 1372"> <thead> <tr> <th rowspan="2">Period (Month)</th> <th colspan="2">BOD (mg/l)</th> <th colspan="2">pH</th> </tr> <tr> <th>Analysis result</th> <th>Standard</th> <th>Analysis result</th> <th>Standard</th> </tr> </thead> <tbody> <tr> <td>January</td> <td>644.3</td> <td>5,000</td> <td>7.81</td> <td>6 - 9</td> </tr> <tr> <td>February</td> <td>217.4</td> <td>5,000</td> <td>7.97</td> <td>6 - 9</td> </tr> <tr> <td>March</td> <td>271.8</td> <td>5,000</td> <td>7.48</td> <td>6 - 9</td> </tr> <tr> <td>April</td> <td>422.8</td> <td>5,000</td> <td>8.47</td> <td>6 - 9</td> </tr> <tr> <td>May</td> <td>2,900</td> <td>5,000</td> <td>2.70</td> <td>6 - 9</td> </tr> </tbody> </table>	Period (Month)	BOD (mg/l)		pH		Analysis result	Standard	Analysis result	Standard	January	644.3	5,000	7.81	6 - 9	February	217.4	5,000	7.97	6 - 9	March	271.8	5,000	7.48	6 - 9	April	422.8	5,000	8.47	6 - 9	May	2,900	5,000	2.70	6 - 9	Comply
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October	3,400	5,000	8.45	6 - 9																																							
7.8.4	Mill water use per tonne of FFB is monitored and recorded.	<p><b>Ukui I POM:</b> PT IIS – Ukui I POM has monitor the mill water usage for FFB process daily and monthly according to flowmeter chart. Ukui II POM has determined the water usage budget for FFB process as much as 1.00 m<sup>3</sup>/ton FFB. Since January – November 2019, total water usage/consumption for FFB process was 368,186 m<sup>3</sup> or 1.31 m<sup>3</sup>/ton FFB.</p> <p>Below are the detail of mill water usage fro FFB process:</p> <table border="1"> <thead> <tr> <th>Period</th> <th>Water usage for FFB process</th> <th>FFB Process</th> <th>Ratio water usage/MT FFB</th> </tr> </thead> <tbody> <tr> <td>January</td> <td>35,215</td> <td>27,948</td> <td>1.26</td> </tr> <tr> <td>February</td> <td>31,888</td> <td>24,719</td> <td>1.29</td> </tr> <tr> <td>March</td> <td>27,878</td> <td>19,360</td> <td>1.44</td> </tr> <tr> <td>April</td> <td>28,444</td> <td>22,755</td> <td>1.25</td> </tr> <tr> <td>May</td> <td>34,356</td> <td>23,858</td> <td>1.44</td> </tr> <tr> <td>June</td> <td>34,040</td> <td>25,403</td> <td>1.34</td> </tr> <tr> <td>July</td> <td>35,562</td> <td>27,147</td> <td>1.31</td> </tr> <tr> <td>August</td> <td>33,855</td> <td>26,042</td> <td>1.30</td> </tr> <tr> <td>September</td> <td>35,307</td> <td>29,921</td> <td>1.18</td> </tr> </tbody> </table>	Period	Water usage for FFB process	FFB Process	Ratio water usage/MT FFB	January	35,215	27,948	1.26	February	31,888	24,719	1.29	March	27,878	19,360	1.44	April	28,444	22,755	1.25	May	34,356	23,858	1.44	June	34,040	25,403	1.34	July	35,562	27,147	1.31	August	33,855	26,042	1.30	September	35,307	29,921	1.18	Comply
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October	37,632	29,867	1.26														
November	34,009	24,644	1.38														
<b>Total</b>	<b>368,186</b>	<b>281,665</b>	<b>1.31</b>														
<p><b>Criteria 7.9:</b> Efficiency of fossil fuel use and the use of renewable energy is optimised</p>																	
7.9.1	<p>A plan for improving efficiency of the use of fossil fuels and to optimize renewable energy is in place, monitored and reported</p>	<p><b>Ukui I POM &amp; Estate:</b></p> <p>Fossil fuel usage for Ukui I Palm Oil Mill was monitored monthly. Fossil fuel use mainly for generator set (genset). Actual diesel fuel usage since January – November 2019 was 11,186. Ukui I POM has monitoring the diesel fuel usage each month. Diesel fuel efficiency has implementing by using renewable energy from fiber/shell and reduce the generator set operation and utilization of Biogas (Gas engine).</p> <p>Company used all the fibre and kernel shell as renewable energy for boiler fuel. The remaining fibre and kernel shell used as replacement of diesel fuel when the palm oil mill is not operating. Company has prepared for fibre and shell -fueled boiler utilization every month. Since January – November 2019 total fibre use for boiler fuel Ukui I POM was 30,584 ton and shell usage for boiler fuel was 5,347 ton.</p> <p>Ukui I POM has a programme to reduce the diesel fuel usage by monitoring the electricity usage by mill management, reducing the diesel fuel usage for generator set by substitute the electric usage from generator set to become PLN electric. In addition to minimize fossil fuel (diesel fuel) usage, Ukui I POM has a project to using B20 50% + FAME 50%. FAME was made from CPO material without fossil fuel mixing.</p>			Comply												

		<p>Program has covered plan to use renewable energy from fiber/shell and from fossil fuel/HSD fuel. Based on energy use data, palm oil mill has utilized more fiber/shell, up to 95% - as energy compared to use of HSD oil use. Ukui I POM shows "Laporan Unit Pabrik" up to November 2019, Based on data of energy production, shows increase, has been monitored monthly basis.</p> <p>Ukui Estate and Mill monitors the use of diesel fuel every month. Diesel fuel efficiency in Estate the efficiency of diesel is done by limiting the genset working hours for housing but not reducing the basic need of electricity for housing. Each home unit is also limited for 2 amperes of power. Beside that, plan for improving efficiency of the use of fossil fuels and to optimise renewable energy are:</p> <ul style="list-style-type: none"> <li>▪ Repair broken road and maintenance the road to get best time for FFB transportation</li> <li>▪ Repair and maintenance the vehicle and heavy equipment to get best condition for fossil fuel saving.</li> <li>▪ Program savings by calculating the ratio of fuel usage</li> </ul> <p><b>Scheme Smallholder:</b> Monitoring of fossil fuel has been performed by Plasma Ukui Group. Program to improving efficiency of the use of fossil fuels has been developed as per "Pedoman Pemanfaatan Efisiensi Sumber Energi" dated 5 January 2019, including:</p> <ul style="list-style-type: none"> <li>- Optimize FFB transportation, not to return to Kavling</li> <li>- Arranging the FFB collection place (TPH) along the collection road to become one way to ease the FFB transportation</li> <li>- Reducing the use of grass cutting machine for weeds control and cooperate with TUS team to handle the weeds control in farmer kavling.</li> </ul> <p>Convert the generator usage to become PLN electric usage.</p>	
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<b>Criteria 7.10:</b> Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.			
7.10.1	<b>(C)</b> GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimize them are implemented, monitored through the Palm GHG calculator and publicly reported.	<b>Ukui I POM &amp; Estate:</b> PT Inti Indosawit Subur – Ukui II POM has identify the significant pollutants and greenhouse gas (GHG) emissions under “Evaluasi Aspek Dampak Lingkungan EMS-431-003-LT” latest updated on Februari 2019: <ul style="list-style-type: none"> <li>- Boiler stack emission including particulate and soot</li> <li>- Diesel electric generator emission</li> <li>- POME methane emission</li> <li>- Use of fertiliser</li> <li>- Use of pesticide/herbicide</li> <li>- Use of chemical material</li> <li>- Vehicle and heavy equipment emission</li> </ul> To control and minimize the greenhouse gas emission and pollution, company has set the program under “Program Manajemen Lingkungan”. The program consists of source of pollution/emission, type of pollution/emission produced, improvement program, person in charge and timeline. The program covers: <ul style="list-style-type: none"> <li>- Control the emission from operational vehicle, where all vehicle shall follows emission test and meet the quality standards;</li> <li>- When vehicle fails to meet quality standard, a repair/maintenance will performed;</li> <li>- Reducing the fossil fuel usage by converting the genset power electricity to become PLN electricity.</li> <li>- Reducing the chemical fertilizer by application the organic fertilizer such as: EFB and waste water for land application</li> <li>- Appropriate fertilizer application (dosage, time, way and place) as per recommendation from R&amp;D</li> <li>- Reducing the herbicide/pesticide usage by Specific target weeds and pest control, implementing the integrated pest management, planting the hostplan as a</li> </ul>	Comply

		<p>nest/hostplan for pest predator, introduction and conserving the natural enemies of pest and disease.</p> <ul style="list-style-type: none"> <li>- Reducing GHG with optimal use of effluent as source of energy for power plant, through use of biogas plant.</li> </ul> <p>Company has SOP Manajemen &amp; Metode Menghitung Emisi Gas Rumah Kaca (GHG) AA-MPM-OP-1400.19.R2.</p> <p>PT IIS – Ukui II POM has calculate the GHG emission using appropriate tools RSPO Palm GHG Version 3.0.1. Calculation of GHG emission period 2018 (January – December). Based on summary of emissions, Total tCO<sub>2</sub>e/t product Ukui I POM and supply bases are: -0.02 tCO<sub>2</sub>e/t CPO and -0.02 tCO<sub>2</sub>e/t PK. Based on data input verification can be demonstrated that all data input for GHG emission calculation was valid and relevant with actual condition and well calculated.</p> <p><b>Ukui Smallholder:</b></p> <p>Significant pollutants and greenhouse gas (GHG) emissions has identified for Ukui I Smallholder under document of Aspect Impact Evaluation of the environment as per "Evaluasi Aspek Dampak Lingkungan EMS-431-002-LT updated on January 2019. Contain information of work activities, pollutant and environmental impact, action plan to mitigate the pollution and environmental impact, target and PIC.</p> <p>The Smallholder manager has develop management plan to reduce pollutants and emissions, presented in "Pedoman Untuk Meningkatkan Efisiensi Penggunaan Energi" January 2019. Below are the management plan to reduce the pollutant and emissions:</p> <ul style="list-style-type: none"> <li>- Optimize FFB transportation, not to return to Kavling</li> <li>- Aranging the FFB collection place (TPH) along the collection road to become one way to ease the FFB transportation</li> </ul>	
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		<ul style="list-style-type: none"> <li>- Reducing the use of grass cutting machine for weeds control and cooperate with TUS team to handle the weeds control in farmer kavling.</li> </ul> <p>Convert the generator usage to become PLN electric usage to reduce the emission of generator usage.</p>	
7.10.2	<p><b>(C)</b> Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimize them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p>	<p>PT Inti Indosawit Subur – Ukui Group Certification unit and supply bases (including smallholder) has develop the palm oil plantation since 1987, 1988, 1989, and the company has starts replanting in 2015.</p> <p>There is no new planting, therefore, the requirement of this indicator is not applicable.</p>	Comply
7.10.3	<p><b>(C)</b> Other significant pollutants are identified and plans to reduce or minimize them implemented and monitored.</p>	<p><b>Ukui I POM &amp; Estate:</b></p> <p>Identification of pollution and emission sources at Mill and Estates activities were evident. The source of pollution, type of pollution and its control was documented in List of environmental aspect and impact evaluation "Evaluasi Aspek – Dampak Lingkungan EMS-431-003-LT" latest updated on Februari 2019, significant pollutant identified:</p> <ul style="list-style-type: none"> <li>- Boiler stack emission including particulate and soot</li> <li>- Diesel electric generator emission</li> <li>- POME methane emission</li> <li>- Use of fertiliser</li> <li>- Use of pesticide/herbicide</li> <li>- Use of chemical material</li> <li>- Vehicle and heavy equipment emission</li> </ul> <p>All the activities of mill and estate as well as the waste generated from has been well documented, for examples the operational activities from generator is generates air emissions, the company conducts periodic generator maintenance and perform</p>	Comply

		<p>quality measurement of exhaust emissions each semester to ensure air quality is comply with standard regulation</p> <p>Monitoring of air emissions and ambient air quality conducted every semester. Emissions test conducted by Accredited Testing Laboratory. The results of the analysis can be demonstrated, and it was indicate in accordance with the quality standards established.</p> <p>Ukui II POM is able to demonstrated "Program Manajemen Lingkungan 2019", detailing plan to reduce significant green house gases that has been identified equipped with a monitoring plan, with explanation of appropriate tools to monitor the effectiveness of the mitigation measures.</p> <p><b>Scheme Smallholder:</b></p> <p>Plasma Ukui management has prepared list of significant pollutants and identify sources of emissions, presented in "Hasil Identifikasi Sumber Polusi di Perkebunan Petani Kebun Plasma Ukui PT Inti Indosawit Subur 2019". List of significant pollutant such as: emission from FFB transportation, water pollutant from fertilizing and spraying activity, emission from generator usage.</p> <p>Green house gas emission calculation using RSPO Palm GHG Version 3.0.1 has been performed included in PT Inti Indosawit Subur – Ukui II POM and supply bases. Calculation of GHG emission period 2018 (January – December) were available as described above.</p> <p>Action plans to reduce and minimize the pollutant has been developed:</p> <ul style="list-style-type: none"> <li>- Optimize FFB transportation by TPH arrangement at the side of collection road to ease the FFB transportation</li> <li>- Limiting the harvesting plot maximum 2 kavling each day, harvester maksimum work 2 kapling each day.</li> <li>- Fertilizing activity as per recommendation</li> <li>- Pesticide spraying by TUS team and appropriate dosage and selective target.</li> </ul>	
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		Minimize the generator set utilization.	
<b>Criteria 7.11:</b>			
Fire is not used for preparing land and is prevented in the managed area.			
7.11.1	<b>(C)</b> Land for new planting or replanting is not prepared by burning.	<p><b>Ukui Estate:</b></p> <p>It was noted that Ukui Estate has conducted replanting activities since 2015 - 2018. Latest replanting performed on 2018 in area of 455 ha by Contractor: Bahtera Mulia Lestari – SPK No. 012/P2KUK/01/18, Andalan Makmur Sejahtera – SPK No. 013/P2KBN/01/18, Selamat mandiri Pratama – SPK No. 014/P2KBN/01/18. Replanting performed without burning. All the replanting activities requires to be documented and monitored, such as: Schedule of replanting (chipping, digging and planting), progress planting LCC (Legume Cover Crop) and Minutes Works replanting (Progress in the Works Contractor) as per “Memorandum No. EST-KUK/MEMO/02/18”.</p> <p>Procedure of Replanting was documented in SOP AA-APM-OP-1100.20-R6 dated 16 February 2017. The procedure described the company commitment to “Zero Burning” by using chipping and stacking using excavator by bucket modification. Procedure of replanting mentioned that Field Assistant, Head Assistant and Estate Manager must perform checks to ensure that the contractor does not perform burning for land preparation for replanting. In the procedure of replanting mentioned that, the methods used are: Toppling trees using heavy equipment (excavators); Chipping: cutting palm trunk, so as not infected with ganoderma; Planting LCC, so that the decay of the old oil palm trunks can be faster; Planting of oil palm. This method has been used in replanting the whole plantation belonging to Asian Agri group including PT Inti Indosawit Subur – Ukui Estate.</p> <p>The company has also established Company Policy signed by Managing Director, Kevin Tio, on 1 December 2014. Point 6 of the policy stated the company uses Zero Burning practice in developing plantation and actively support initiative to prevent and monitor forest fire and hatze.</p>	Comply

		<p>Based on field observation, it was evident that no fire has been used for replanting in Ukui Estate.</p> <p><b>Scheme Smallholder:</b></p> <p>The Smallholder Manager has prepared the policy that there were no land preparation by burning, as per "Kebijakan Manager Plasma Ukui" dated 2 December 2016, Revised in 16 January 2017 in poin 6: "Melakukan praktek tanpa bakar dalam kegiatan pembangunan perkebunan dan petani maupun desa secara aktif mendukung inisiatif mencegah mengawasi kebakaran hutan dan asap" (Implementing non-burning practices in plantation development activities, farmers and villages actively support initiatives to prevent and control forest fires and smoke).</p> <p>The policy has communicated to individual member and available in guidance book (Buku Panduan dan Catatan) which distributing to all farmers as well as the information display on the notice board in filed also emphasize on the no use of fire policy. During interview with smallholder member in KUD Sumber Bahagia, KUD Karya Bersama and KUD Usaha Baru indicated that they have understanding on zero burning policy.</p>	
7.11.2	The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification.	<p><b>Ukui I POM, Estate &amp; Smallholder:</b></p> <p>PT Inti Indosawit Subur has performed and establishes fire prevention and control measures for whole area of company. Fire monitoring was done daily by Fire team and security to monitor the hotspot and fire by patrol to critical area of plantation. Maps of fire critical area has been develop and determined by company and monitor accordingly as per "Peta Area Rawan Kebakaran PT Inti Indosawit Subur – Kebun Ukui". According to hotspot monitoring period Januari – June 2019 shown that there is no hotspot identified at Ukui Estate.</p> <p>In addition, company implementing fire danger rating as early warning system. According to monitoring result since January – June 2019, generally fire danger rating categorized as low risk.</p>	Comply



		<p>Basic fire training also has been performed to increase the competency of workers particularly for emergency response team. Latest basic fire training conducted on 11 April 2019 (attend by 26 person).</p> <p>Tools and equipment of fire prevention has been prepared by company as per “Daftar Peralatan Pemadam Kebakaran”.</p> <p>The activity of fire prevention and control present in “Laporan Pencegahan Pencemaran dan atau Kerusakan Lingkungan Hidup yang Berkaitan dengan Kebakaran Lahan” Period January – June 2019. Report of fire prevention and control are submitted to related authority (Dinas Lingkungan Hidup &amp; Dinas Perkebunan) each semester.</p>	
7.11.3	<p>The unit of certification engages with adjacent stakeholders on fire prevention and control measures.</p>	<p><b>Ukui I POM and Estate:</b></p> <p>PT IIS Ukui POM has a programme namely “Fire Free Village Programme (FFVP). PT IIS recognize this engagement program, comprises the following segments:</p> <ul style="list-style-type: none"> <li>- Increase community awareness. Company conduct intensive communication with the local community to increase awareness on the impact of fire and haze on health</li> <li>- Empowerment village head. During the dry season, villages play a significant role to synergize the prevention and mitigation of land fire.</li> <li>- Provide support for land clearing</li> <li>- Appreciation for zero burning</li> <li>- Assistance to enhance local economy.</li> </ul> <p>Village which involve in this program was Bagan Limau Village with area 12,470 ha and population 2,722. A group consisting estate manager, crew leader, member of fire care community (MPA-Masyarakat Peduli Api) and sub village head are appointed to coordinate and exchange information regarding any fire occurrence within or near the village or operation area. By using social media information is expected to be promptly managed or checked.</p>	Comply

		<p>Regular and continuous basic fire training has been delivered by Fire Team of Asian Agri to Masyarakat Peduli Api. Latest training conducted on 1 November 2019 at bagan Limau Village and 26 October 2019 attended by 114 participants.</p> <p><b>Scheme Smallholder:</b></p> <p>The Smallholder Manager has prepared the policy that there were no land preparation by burning, as per "Kebijakan Manager Plasma Ukui" dated 2 December 2016, Revised in 16 January 2017 in point 6: "Melakukan praktek tanpa bakar dalam kegiatan pembangunan perkebunan dan petani maupun desa secara aktif mendukung inisiatif mencegah mengawasi kebakaran hutan dan asap" (Implementing non-burning practices in plantation development activities, farmers and villages actively support initiatives to prevent and control forest fires and smoke).</p> <p>The policy has communicated to individual members and is available in a guidance book (Buku Panduan dan Catatan) which is distributed to all farmers as well as the information displayed on the notice board in the field also emphasizes on the no use of fire policy.</p> <p>Fire monitoring and patrol has been performed weekly and depends on the condition during dry season. Evidence of monitoring is present in "Monitoring Patroli Api" samples seen for KUD Karya Bersama, KUD Usaha Baru, KUD Sumber Bahagia.</p>	
<p><b>Criteria 7.12:</b></p> <p>Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.</p>			
<p><b>PROCEDURAL NOTE for 7.12:</b></p> <p>The 2018 RSPO P&amp;C include new requirements to ensure the effective contribution of RSPO to halting deforestation. This will be achieved by incorporating the High Carbon Stock Approach (HCSA) Toolkit in the revised standard.</p> <p>The RSPO ToC also commits RSPO to balancing sustainable livelihoods and poverty reduction with the need to conserve, protect and enhance ecosystems.</p> <p>High Forest Cover Countries (HFCCs) urgently require economic opportunities that enable communities to choose their own development path, while providing socio-economic benefits and safeguards.</p>			

<p>Adapted procedures will be developed to support the sustainable development of palm oil by indigenous peoples and local communities with legal or customary rights. These will apply in specific HFCCs, and within those, in High Forest Cover Landscapes (HFCLs).</p> <p>The development of these procedures will be guided by a No Deforestation Joint Steering Group (NDJSG) of RSPO and HCSA members. In HFCCs, RSPO will work through national and local participatory processes with governments, communities and other stakeholders to develop these procedures. A timeframe for these activities is stipulated in the Terms of Reference for the NDJSG and publicly available.</p>			
7.12.1	<p><b>(C)</b> Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests.</p> <p>A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</p>	<p>PT Inti Indosawit Subur – Ukui Group Certification unit and supply bases (including smallholder) did not carry out any new plantings after November 2005. The planting year started in 1987, 1988, 1989, and the company has starts replanting in 2015 – 2018.</p> <p>Therefore, the requirement of this indicator is not applicable.</p>	Comply
7.12.2	<p><b>(C)</b> HCVs, HCS forests and other conservation areas are identified as follows:</p> <p>7.12.2a For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p>	<p>PT Inti Indosawit Subur – Ukui Group is in cooperation with Faculty of Forestry, Bogor Agriculture University in preparing HCV Identification “Dokumen Identifikasi dan Analisis Keberadaan Nilai Konservasi Tinggi (NKT) di Areal Perkebunan Kelapa Sawit di Kebun Ukui dan Soga pada tahun 2010”. Guidance use is HCV Toolkit 2008. The document has put into consideration the landscape condition, including Teso Nilo National Park near the plantation. HCV assessment was including plasma/scheme smallholder area.</p> <p>The assessment team comprise of Ir.Nyoto Santoso, MS as lead assessor HCV RN registered lead assessor, Ir.Heru B Pulunggono, MSc (hydrology and soil conservation), Handian Purwawangsa, S.Hut, MSI, (social), Iing Nasihin S.Hut, MSi (flora and GIS), Tutut Sunarminto, MSi, (social and cultural), Yanti Apriyanti,S.Pi (social and cultural), Rizki Ratna Ayu Paramita Sari, S.Hut (social and cultural). The HCV assessment identified the presence of HCV 1.1, HCV 1.2, HCV 1.3, HCV 2.3, HCV</p>	Comply

		<p>4.1 and HCV 6 with total (under PT Inti Indosawit Subur – Ukui Group/Ukui Estate and Soga Estate) of 234.458 Ha.</p> <p>HCV identified in Ukui Estate:</p> <table border="1"> <thead> <tr> <th>HCV</th> <th>Status</th> <th>Ha</th> </tr> </thead> <tbody> <tr> <td>River/Sungai Air Hitam Kiri</td> <td>1.1, 1.2, 1.3, 4.1</td> <td>47.071</td> </tr> <tr> <td>River/Sungai Air Hitam Kanan</td> <td>1.1, 1.2, 1.3, 4.1</td> <td>22.984</td> </tr> <tr> <td>Tributary/Anak Sungai Air Hitam Atas</td> <td>1.1, 1.2, 4.1</td> <td>15.926</td> </tr> <tr> <td>Tributary/Anak Sungai Air Hitam Kiri</td> <td>1.1, 1.2, 4.1</td> <td>14.031</td> </tr> <tr> <td>Tributary/Anak-Anak Sungai Napuh</td> <td>1.1, 1.2, 4.1</td> <td>6.891</td> </tr> <tr> <td>Lake/Danau (Rawa) Bengkuang</td> <td>1.1, 1.2, 1.3, 4.1</td> <td>1.925</td> </tr> <tr> <td>Water reservoir/ Kolam (Danau) Ukui 1 POM</td> <td>1.1, 4.1</td> <td>3.367</td> </tr> <tr> <td>Protected forest/Hutan Makam Keramat</td> <td>1.2, 1.3, 2.3, 6</td> <td>3.965</td> </tr> <tr> <td><b>Total</b></td> <td></td> <td><b>116.160</b></td> </tr> </tbody> </table> <p>Most of the HCV identified, located within the existing plantation. Company maintain the riparian area. A number of fauna identified in the plantation area: Mammals such as "Kucing kuwuk (<i>Felis bengalensis</i>), Kancil (<i>Tragulus javanicus</i>), Kijang (<i>Muntiacus muntjak</i>), Trenggiling (<i>Manis javanica</i>), Monyet ekor panjang (<i>Macaca fascicularis</i>), Beruk (<i>Macaca nemestrina</i>), Musang (<i>Paradoxurus hermaphroditus</i>). Birds/Aves such as "Raja udang meninting (<i>Alcedo meninting</i>), Burung madu (<i>Aethopyga siparaja</i> and <i>Nectarinia jugularis</i>), Elang tikus (<i>Elanus caeruleus</i>), Elang ular bido (<i>Spilomis cheela</i>), Cekakak belukar (<i>Halicyon smymensis</i>), Kipasan belang (<i>Rhipidura javanica</i>). Reptile such as "Ular Piton (<i>Phyton molurus</i>), Biawak (<i>Varanus salvator</i>). Identified also protected plants such as "Meranti batu (<i>Shorea leprosula</i>), Meranti bunga (<i>Shorea teysmanniana</i>).</p> <p>HCV assessment performed in consultation with relevant stakeholders/public consultation.</p> <p>The HCV identification report was peer reviewed by WWF on 10/25/2010 - 10/27/2010.</p>	HCV	Status	Ha	River/Sungai Air Hitam Kiri	1.1, 1.2, 1.3, 4.1	47.071	River/Sungai Air Hitam Kanan	1.1, 1.2, 1.3, 4.1	22.984	Tributary/Anak Sungai Air Hitam Atas	1.1, 1.2, 4.1	15.926	Tributary/Anak Sungai Air Hitam Kiri	1.1, 1.2, 4.1	14.031	Tributary/Anak-Anak Sungai Napuh	1.1, 1.2, 4.1	6.891	Lake/Danau (Rawa) Bengkuang	1.1, 1.2, 1.3, 4.1	1.925	Water reservoir/ Kolam (Danau) Ukui 1 POM	1.1, 4.1	3.367	Protected forest/Hutan Makam Keramat	1.2, 1.3, 2.3, 6	3.965	<b>Total</b>		<b>116.160</b>	
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		During field visit, HCV area identified are manage and monitor accordingly according to Conservation Management and Monitoring Plan. At block replanting, HCV area are protected accordingly as per HCV boundary marker.	
	7.12.2 b: Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.	PT Inti Indosawit Subur – Ukui Group Certification unit and supply bases (including smallholder) did not carry out any new plantings after November 2005. The planting year started in 1987, 1988, 1989, and the company has starts replanting in 2015 – 2018.  Therefore, the requirement of this indicator is not applicable.	
<p><b>PROCEDURAL NOTE for 7.12.2:</b>          For details of transitional measures, refer to Annex 5: RSPO transition from HCV assessments to HCV-HCSA assessments.</p>			
7.12.3	<b>(C)</b> In High Forest Cover Landscapes (HFCLs) within HFCCs, a specific procedure will apply for legacy cases and development by indigenous peoples and local communities with legal or customary rights, taking into consideration regional and national multi-stakeholder processes. Until this procedure is developed and endorsed, 7.12.2 applies.	According to HCV assessment 2010, there is no High Forest Cover Landscapes (HFCLs) identified. Most of the HCV identified, located within the existing plantation. Company maintain the riparian area.	Comply
<p><b>PROCEDURAL NOTE for 7.12.3:</b>          There should be demonstrable benefits to the local community; clear recognition of legal and customary lands based on participatory land use planning; development should be proportional to the needs of the local community; with a balance between conservation and development. This procedure will also cover planting on previous or abandoned agricultural land / plantations. All other P&amp;C requirements apply, including FPIC and HCV requirements.</p>			

7.12.4	<p><b>(C)</b> Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p>	<p>PT Inti Indosawit Subur – Ukui Group Certification unit and supply bases (including smallholder) did not carry out any new plantings after November 2005. The planting year started in 1987, 1988, 1989, and the company has starts replanting in 2015 – 2018.</p> <p>Therefore, the requirement of this indicator is not applicable.</p>	Comply
7.12.5	<p>Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peatland and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p>	<p>PT Inti Indosawit Subur – Ukui Group Certification unit and supply bases (including smallholder) did not carry out any new plantings after November 2005. The planting year started in 1987, 1988, 1989, and the company has starts replanting in 2015 – 2018.</p> <p>Therefore, the requirement of this indicator is not applicable.</p>	Comply
7.12.6	<p>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</p>	<p><b>Ukui Estate:</b></p> <p>A number of fauna identified in the plantation area: Mammals such as “Kucing kuwuk” (<i>Felis bengalensis</i>), “Kancil” (<i>Tragulus javanicus</i>), “Kijang” (<i>Muntiacus muntjak</i>), “Trenggiling” (<i>Manis javanica</i>), Monkey (<i>Macaca fascicularis</i>), “Beruk” (<i>Macaca nemestrina</i>), “Musang” (<i>Paradoxurus hermaphroditus</i>). Birds such as “Raja udang meninting” (<i>Alcedo meninting</i>), “Burung madu” (<i>Aethopyga siparaja</i> and <i>Nectarinia jugularis</i>), “Elang tikus” (<i>Elanus caeruleus</i>), “Elang ular bido” (<i>Spilomis</i></p>	Comply

	<p>if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p>	<p><i>cheela</i>), "Cekakak belukar" (<i>Halicyon smymensis</i>), "Kipasan belang" (<i>Rhipidura javanica</i>). Reptile such as "Ular Piton" (<i>Phyton molurus</i>), Biawak (<i>Varanus salvator</i>). Identified also protected plants such as "Meranti batu" (<i>Shorea leprosula</i>), "Meranti bunga" (<i>Shorea teysmanniana</i>).</p> <p>Company has prepared a procedure for protection of flora and fauna, explained in Environmental Management System: Biodiversity (AA-432-002e-LT), IUCN redlist (AA-432-006-LT), CITES list (AA-432-07-LT).</p> <p>Estate has established the management plan to maintain and/or enhance High conservation value area. HCV management and monitoring plan described measures taken for each HCV and its monitoring. Relevant laws were taken into account for determining appropriate measure including UU #5/1990 about Natural resources conservation, PP#7/1999 about List of protected plan and wildlife, Kepres #32/1990, and PP #26/2008. Conservation management plan consist of :</p> <ul style="list-style-type: none"> <li>- Area demarcation</li> <li>- Sosialization of HCV area and protection to employee and surrounding community</li> <li>- Riparian restoration</li> <li>- Prohibiting chemical application in riparian zone</li> </ul> <p>Signboards are placed on the area identified with conservation values. Monitoring for the HCVs are carried out as per Conservation Management Plan. The conservation management plan covers area enhancement, socialization to workers and local communities, prohibition of chemical regime near the area and river buffer zone' restoration. Plan for monitoring and patrol has been incorporated into the management and monitoring plan. Another effort planned was to have HCV sign board and "no-hunting" sign boards placed near identified HCV areas – on progress. PT Inti Indosawit Subur – Ukui Group is also having procedure to monitor the protected/conservation area as per "SOP Pemantauan Areal Lindung" No.AA-PL-08-EFP – describing procedure for vegetation monitoring, wildlife monitoring (path and rapid method), conservation area inspection procedure, vegetation enhancement procedure and data analysis procedure.</p>	
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		<p>Field observation to HCV area and document verification "Laporan Monitoring Pengelolaan Tumbuhan dan Satwa Nilai Konservasi Tinggi" of PT Inti Indosawit Subur – Kebun Ukui period semester I 2019 can be demonstrate that the measures contained in the management plan been actively implemented.</p> <p>Company continuously disseminating HCV and wildlife protection to employee and surrounding community. Sample seen on socialization on 16 February 2019 and 7 September 2019 to spraying workers and IPM workers.</p> <p><b>Ukui Smallholder:</b></p> <p>The management of Ukui Smallholder has develop the Conservation Management Plan 2019, updated on February 2019 consist of:</p> <ul style="list-style-type: none"> <li>- Area demarcation and maintenance the boundary markers</li> <li>- Sosialization of HCV area and protection to employee and surrounding community</li> <li>- Riparian restoration</li> <li>- Prohibiting chemical application in riparian zone/river border.</li> </ul> <p>Regarding issue raised by WWF (Flaying Swap) and Teso Nilo National Park during previous assessment related potential elephant attack in planned smallholder replanting area, during this assessment Ukui Smallholder Manager has defined the SOP for individual members to report on threats to HCVs and presence of RTE species in the procedure "Konflik Dengan Satwa Yang Dilindungi No. 015/DOK/SOP/PT.KLU-AA/2016" dated 2 December 2016.</p> <p>Each individual member shall be identified and observe the RTE species in their kavling. Each member notes the presence of RTE species in their "Buku Panduan dan Catatan Petani", the report was delivered to Ukui Smallholder Manager and forward to official of "BKSDA Riau". If the RTE species was Sumateran Elephant, Smallholder Manager shall coordinated with BKSDA Riau and WWF Flying Squad to handle and prevent the conflict between human and animal.</p>	
7.12.7	The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems,	<b>Ukui Estate:</b>	Opportunity for



	<p>peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p>	<p>Company has consistently monitors the status of HCV area, as well as protected flora and fauna species. This is recorded in "Laporan Monitoring Tumbuhan dan Satwa Liar PT Inti Indosawit Subur Kebun Soga dan Sei Lala periode Semester I 2019" (monitoring period January – June 2019). The report explains the monitoring on status of plant and wildlife, disturbance and damage to the protected area. Wildlife observations are conducted monthly by Mandor HCV in each Afdeling. Latest observation in November 2019 documented in the "Daftar Temuan satwa liar di areal kebun" observed several protected species at Ukui Estate such as: cekakak belukar (<i>Halcyon smyrnensis</i>), Kipasan belang (<i>Rhipidura javanica</i>), Crimson Sunbird (<i>Aethopyga siparaja</i>), Biawak (<i>Varanus salvator</i>), Ular Kobra (<i>Naja sumatrana</i>), Kucing akar (<i>Felis bengalensis</i>).</p> <p><b>Scheme Smallholder:</b>  Management of Ukui Smallholder has defined the mechanism for individual members to report on threats to HCVs in the procedure "Konflik Dengan Satwa Yang Dilindungi No. 015/DOK/SOP/PT.KLU-AA/2016" dated 2 December 2016. All member has responsible to report the presence of RTE species, animal conflict, and threats to HCVs in their kavling. They report to KUD or KT and forward to Smallholder Manager. Plasma Ukui has performed monitoring of wildlife each month by WKAK (Wadah Kerja Antar Kelompok) or head of KT (Pengurus Perlindungan Satwa Liar). Each KUD has assigned the PIC to monitor the protected animal and species based on decree letter issued by KUD. Sample seen in KUD Sumber Bahagia, KUD Karya Bersama and KUD Usaha Baru. Wildlife monitoring recorded in "Formulir Daftar Temuan Satwa Liar". For example monitoring result at KUD Sumber Bahagia, KUD Karya Bersama and KUD Usaha Baru on November 2019 there were found the presence of Cekakak belukar (<i>Halcyon smyrnensis</i>), Biawak (<i>Varanus salvator</i>), Elang hitam (<i>Ictinaetus malayanus</i>), Ular Kobra (<i>Naja sumatrana</i>), Kucing hutan (<i>Felis bengalensis</i>).</p> <p>Company reported the management and monitoring of HCV including the animal presence each semester to BKSDA Provinsi Riau and Dinas Lingkungan Hidup Kab. Pelalawan.</p>	<p>Improveme nt</p>
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7.12.8	<p><b>(C)</b> Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.</p>	<p>PT Inti Indosawit Subur – Ukui Group Certification unit and supply bases (including smallholder) did not carry out any new plantings after November 2005. The planting year started in 1987, 1988, 1989, and the company has starts replanting in 2015 – 2018.</p> <p>Therefore, the requirement of this indicator is not applicable.</p>	Comply
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**Appendix B: Approved Time Bound Plan**

Name of Mill	Mill Address	Name of Supply Base Plantation	Estate Address	Time Bound for Certification	Status
Buatan I	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency	Buatan Estate	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency	2010	Certified on 16 September 2010. Re-Certified on 16 September 2015
		Buatan (Plasma)	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency	2010	Certified on 16 September 2010. Re-Certified on 16 September 2015
Buatan II	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency	Buatan Estate	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency	2010	Certified on 16 September 2010. Re-Certified on 16 September 2015
		Buatan (Plasma)	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency	2010	Certified on 16 September 2010. Re-Certified on 16 September 2015
Ukui I	Ukui Village, Ukui District, Pelalawan Regency, Riau	Ukui Estate	Ukui Village, Ukui District, Pelalawan Regency, Riau	2010	Certified on 1 March 2011. Re-Certified on 1 March 2016
		Ukui (Plasma)	Ukui & Lubuk Batu Jaya District, Pelalawan & Indragiri Hulu Regency, Riau	2010	Certified on 1 March 2011. Re-Certified on 1 March 2016
Ukui II	Ukui Village, Ukui District, Pelalawan Regency, Riau	Soga Estate	Ukui Village, Ukui District, Pelalawan Regency, Riau	2010	Certified on 1 March 2011. Re-Certified on 1 March 2016
		Ukui (Plasma)	Ukui & Lubuk Batu Jaya District, Pelalawan & Indragiri Hulu Regency, Riau	2010	Certified on 1 March 2011. Re-Certified on 1 March 2016
Tungkal Ulu Mill	Pulau Pauh/Penyabungan/Merlung Village, Tungkal Ulu District, West Tanjung Jabung Regency, Jambi	Tungkal Ulu Estate	Pulau Pauh/Penyabungan/Merlung Village, Tungkal Ulu District, West Tanjung Jabung Regency, Jambi	2011	Certified on 15 August 2012. Re-Certified on August 2017
		Tungkal Ulu (Plasma)	Renah Mendalo, Merlung, Muara Papalik District, West Tanjung Jabung Regency, Jambi	2011	Certified on 11 July 2013. Re-Certified on August 2017
Muara Bulian Mill	Singoan/Bukit Sari/Bulian Jaya Village, Muara	Muara Bulian Estate	Singoan/Bukit Sari/Bulian Jaya Village, Muara	2011	Certified on 28 August 2012. Re-Certified on August 2017

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Name of Mill	Mill Address	Name of Supply Base Plantation	Estate Address	Time Bound for Certification	Status
	Bulian/Pemayang District, Batang Hari Regency, Jambi		Bulian/Pemayang District, Batang Hari Regency, Jambi		
		Muara Bulian (Plasma)	Maro Sebo Ilir District, Batang Hari Regency, Jambi	2011	Certified on 12 July 2013. Re-Certified on August 2017
Topaz Mill	Petapahan Village, Tapung District, Kampar Regency, Riau	Topaz & Seed Garden Estate	Petapahan Village, Tapung District, Kampar Regency, Riau	2013	Certified on 30 March 2015.
Taman Raja Mill	Lubuk Bernai/Kampung Baru / Pelabuhan Dagang/Pematang Pauh Village, Tungkal Ulu District, West Tanjung Jabung Regency, Jambi	Taman Raja & Badang Estate	Lubuk Bernai/Kampung Baru / Pelabuhan Dagang/Pematang Pauh Village, Tungkal Ulu District, West Tanjung Jabung Regency, Jambi	2013	Certified on 20 February 2015.
Segati Mill	Langkan/Penarikan/Tambak/Sotol Village, Langgam District, Pelalawan Regency, Riau	Segati Estate	Langkan/Penarikan/Tambak/Sotol Village, Langgam District, Pelalawan Regency, Riau	Main Audit in 2014	NPP & RaCP is still in Progress. Re-Audit Planned in 2020
		Penarikan & Gondai Estate	Pangkalan Sarik/Baru Village, Langgam / Siak Hulu District, Pelalawan / Kampar Regency, Riau	Main Audit in 2014	NPP & RaCP is still in Progress. Re-Audit Planned in 2020
		Penarikan (KKPA)	Pangkalan Sarik/Baru Village, Langgam / Siak Hulu District, Pelalawan / Kampar Regency, Riau	2020	-
		Gunung Sahilan (KKPA)	Gunung Sahilan Village, Lipat Kain District, Pelalawan Regency, Riau	2020	-
Tanah Datar Mill	Tanah Datar Petatal Village, Talawi District, Asahan Regency, North Sumatra	Tanah Datar Estate	Tanah Datar Petatal Village, Talawi District, Asahan Regency, North Sumatra	2013	Certified on 18 May 2015
		Bahilang Estate	Bahilang Village, Tebing Tinggi District, Serdang Bedagai Regency, North Sumatra	2013	Certified on 18 May 2015

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Name of Mill	Mill Address	Name of Supply Base Plantation	Estate Address	Time Bound for Certification	Status
Aek Nabara Mill	S1-S3/Sukadame Village, Bilah Hulu/Kota Pinang District, Labuhan Batu Regency, North Sumatra	Aek Nabara Estate	S1-S3/Sukadame Village, Bilah Hulu/Kota Pinang District, Labuhan Batu Regency, North Sumatra	2013	Certified on 6 March 2015
Teluk Panjie Mill	Teluk Panjie Village, Kampung Rakyat District, Labuhan Batu Regency, north Sumatra	Teluk Panjie Estate (3,885 Ha)	Teluk Panjie Village, Kampung Rakyat District, Labuhan Batu Regency, north Sumatra	2013	Certified on 21 April 2015
		Teluk Panjie Estate (801 Ha)		2020	HGU Still in progress
Peranap Mill	Simelinyang/Pauh Ranap/ Sengkilo Village, Peranap District, Indragiri Hulu Regency, Riau	Peranap Estate	Simelinyang/Pauh Ranap/ Sengkilo Village, Peranap District, Indragiri Hulu Regency, Riau	2013	Certified on 7 January 2015
		Peranap (Plasma)		2013	Certified on 18 August 2016
Bungo Tebo Mill	Tuo Sumai/Sungai Rambai Village, Sumai District/Tebo Dsitric, Bungo Tebo Regency, Jambi	Bungo Tebo Estate	Tuo Sumai/Sungai Rambai Village, Sumai District/Tebo Dsitric, Bungo Tebo Regency, Jambi	2016	Certified on 3 December 2015
		Bungo Tebo (Plasma)		2016	Certified on 7 February 2017
Tanjung Selamat Mill	Kampung Padang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatera	Tanjung Selamat Estate	Kampung Padang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatera	2017	Certified on 26 May 2015
		Pangkalan Estate		Sennah Village, Pangkatan District, Labuhan Batu Regency, North Sumatera	2017
Gunung Melayu I Mill	Batu Anam Village, Rahuning District, Asahan Regency, North Sumatra Province	Pulau Maria Estate	Batu Anam Village, Rahuning District, Asahan Regency, North Sumatra Province	2017	Certified on 7 September 2015
Gunung Melayu II	Gonting Mahala Village, Bandar Pulau District, Asahan Regency, North Sumatera	Sentra & Batu Anam Estate	Gonting Mahala Village, Bandar Pulau District, Asahan Regency, North Sumatera	2017	Certified on 8 July 2015
Negri Lama II Mill	Negri Lama Sebrang Village, Bilah Hilir District, Labuhan Batu Regeny, North Sumatera	Negri Lama Estate	Negri Lama Sebrang Village, Bilah Hilir District, Labuhan Batu Regeny, North Sumatera	2018	- Certified on 23 December 2016 (Independent Mill) - Initial Audit in 2016 as Mill and Supply Base

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Name of Mill	Mill Address	Name of Supply Base Plantation	Estate Address	Time Bound for Certification	Status
		Aek Kuo Estate (2,088 Ha)	Aek Korsik Village, Aek Natas District, Labuhan Batu North	2018	
		Aek Kuo Estate (501 Ha)	Labuhan Batu North Regency, Sumatera	2018	HGU complete and audited at ASA-3 (2018)
Negri Lama I Mill	Negri Lama Sebrang Village, Bilah Hilir District, Labuhan Batu Regeny, North Sumatera	3 <sup>rd</sup> party which is excluded from scope of certification	Negri Lama Sebrang Village, Bilah Hilir District, Labuhan Batu Regeny, North Sumatera	2013	Certified on 8 April 2015 as Independent Mill)

**Appendix C: GHG Reporting Executive Summary**

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

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

The summary of the Net GHG emitted in **2018** for **Ukui I POM** and supply base are as following:

Emission per product	tCO <sub>2</sub> e/tProduct
CPO	-0.02
PKO	-0.02

Extraction	%
OER	19.8
KER	5.06

Production	t/yr
FFB Process	339,335
CPO Produced	67,178
PK Produced	17,183

Land Use	Ha
OP Planted Area	10,117.56
OP Planted on peat	0
Conservation (forested)	0
Conservation (non-forested)	60.74
<b>Total</b>	<b>10,178.3</b>

**Summary of Field Emission and Sink**

	Own Crop*		Group		3 <sup>rd</sup> Party		Total	
	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB
<b>Emission</b>								
Land Conversion	0	0	0	0	0	0	0	0
CO <sub>2</sub> Emission from fertilizer	1,002.43	0.02	2,935.59	0.02	0	0	3,938.02	0.04
NO <sub>2</sub> Emission	2,957.92	0.06	3,067.78	0.02	0	0	6,025.70	0.08
Fuel Consumption	557.62	0.01	473.96	0	0	0	1,031.58	0.01
Peat Oxidation	0	0	0	0	0	0	0	0
<b>Sink</b>								
Crop Sequestration	0	0	0	0	0	0	0	0

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Conservation Sequestration	0	0	0	0	0	0	0	0
<b>Total</b>	<b>4,517.97</b>	<b>0.08</b>	<b>76,477.33</b>	<b>0.05</b>	<b>6,196.5</b>	<b>0</b>	<b>10,995.30</b>	<b>0.13</b>

\*Note: Includes both estates and smallholders

**Summary of Mill Emission and Credit**

	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB
<b>Emission</b>		
POME	9,723.5	0.003
Fuel Consumption	161.85	0
Grid Electricity Utilization	0	0
<b>Credit</b>		
Export of Grid Electricity	-2,946.22	-0.01
Sales of PKS	-25,579.4	-0.08
Sales of EFB	0	0
<b>Total</b>	<b>-18,640.27</b>	<b>-0.05</b>

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

Emissions	tCO <sub>2</sub> e
PK from own mill	-295.03
PK from other source	0
Fuel Consumptions	0
<b>Total Crusher emissions</b>	<b>-295.03</b>

\*This mill has no kernel crusher operation.

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

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



**Appendix D: Supply Chain Declaration**

<b>A. Monthly Records of Certified and Uncertified FFB Received since the last audit</b>				
<b>No.</b>	<b>Month - Year</b>	<b>Volume of FFB from certified supply bases (mt)</b>	<b>Volume of FFB from uncertified supply bases (mt)</b>	<b>Total FFB/Month (mt)</b>
1	December 2018	18,182	11,879	30,061
2	January 2019	17,639	9,651	27,290
3	February 2019	17,158	6,999	24,157
4	March 2019	14,110	4,844	18,954
5	April 2019	16,914	5,413	22,327
6	May 2019	16,827	6,598	23,425
7	June 2019	17,973	6,761	24,734
8	July 2019	16,873	9,418	26,291
9	August 2019	15,541	9,802	25,343
10	September 2019	16,846	12,011	28,857
11	October 2019	17,241	11,137	28,378
12	November 2019	15,989	8,519	24,508
		201,293	103,032	304,325
<b>Note:</b>				

<b>B. Monthly Records of Certified CPO &amp; PK since the last audit</b>			
<b>No.</b>	<b>Month - Year</b>	<b>Certified CPO (mt)</b>	<b>Certified PK (mt)</b>
1	December 2018	3,716.96	933.98
2	January 2019	3,724.21	965.61
3	February 2019	3,471.50	959.48
4	March 2019	2,944.62	786.04
5	April 2019	3,404.50	882.38
6	May 2019	3,350.74	883.48
7	June 2019	3,589.70	942.54
8	July 2019	3,406.97	921.05
9	August 2019	3,259.35	869.94
10	September 2019	3,495.14	937.24
11	October 2019	3,576.90	976.63
12	November 2019	3,253.98	834.57
		41,194.57	10,892.94

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**Note:**

<b>C. Records of Certified CPO &amp; PK Sold under PalmTrace to Buyers since the last audit (if any)</b>					
<b>No.</b>	<b>Month- Year</b>	<b>Buyers Name</b>	<b>Palmtrace Trading License Number</b>	<b>Certified CPO Sold (mt)</b>	<b>Certified PK Sold (mt)</b>
1	December-18	Classified	TR-2a1a65a0-d1da		932.24
2	January-19	Classified	TR-fe5f4d81-b9ee		847.55
3	February-19	Classified	TR-3ddcc0eb-639a		1065.49
4	March-19	Classified	TR-29a5e44d-c770		832.09
5	April-19	Classified	TR-3c25830b-cb5b		109.37
6	April-19	Classified	TR-43642d14-7487		671.97
7	May-19	Classified	TR-19c8253e-e028		910.9
8	June-19	Classified	TR-97717aa4-1c16		868.05
9	July-19	Classified	TR-b517d4d1-036a		1086.19
10	August-19	Classified	TR-172d6d78-251f		740.55
11	August-19	Classified	TR-88a61ed6-7acb	65.44	0
12	September-19	Classified	TR-da165b1b-879c		865.9
13	October-19	Classified	TR-64a031a9-5b96		1020.57
				65.44	9,950.87

**Note:**

<b>D. Records of CPO &amp; PK Sold under other schemes to Buyers since the last audit (if any)</b>					
<b>No.</b>	<b>Month- Year</b>	<b>Buyers Name</b>	<b>Scheme Name</b>	<b>CPO Sold (mt)</b>	<b>PK Sold (mt)</b>
1	December 2018	Classified	ISCC	3,289.68	
2	January 2019	Classified	ISCC	3,934.15	
3	February 2019	Classified	ISCC	3,461.81	
4	March 2019	Classified	ISCC	3,612.24	
5	April 2019	Classified	ISCC	3,835.79	
6	May 2019	Classified	ISCC	2,510.75	
7	June 2019	Classified	ISCC	4,068.59	
8	July 2019	Classified	ISCC	3,861.76	

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9	August 2019	Classified	ISCC	2,964.09	
10	September 2019	Classified	ISCC	3,282.15	
11	October 2019	Classified	ISCC	3,792.51	
12	November 2019	Classified	ISCC	2,272.15	
				40,885.67	

**Note:**

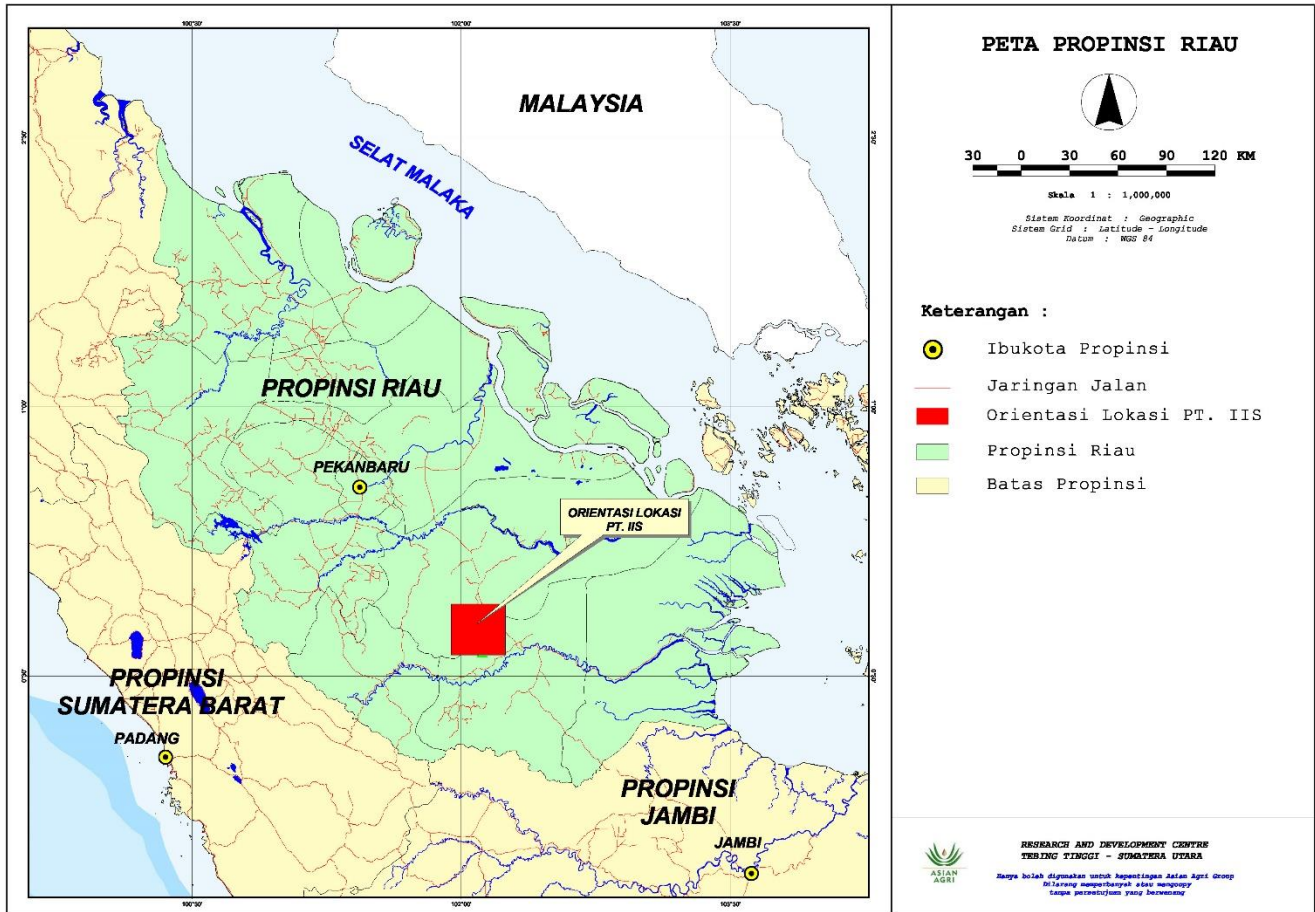
<b>E. Records of CPO &amp; PK Sold as conventional to Buyers since the last audit (if any)</b>			
<b>No.</b>	<b>Buyers Name</b>	<b>CPO Sold (mt)</b>	<b>PK Sold (mt)</b>
	N/A		

**Note:**

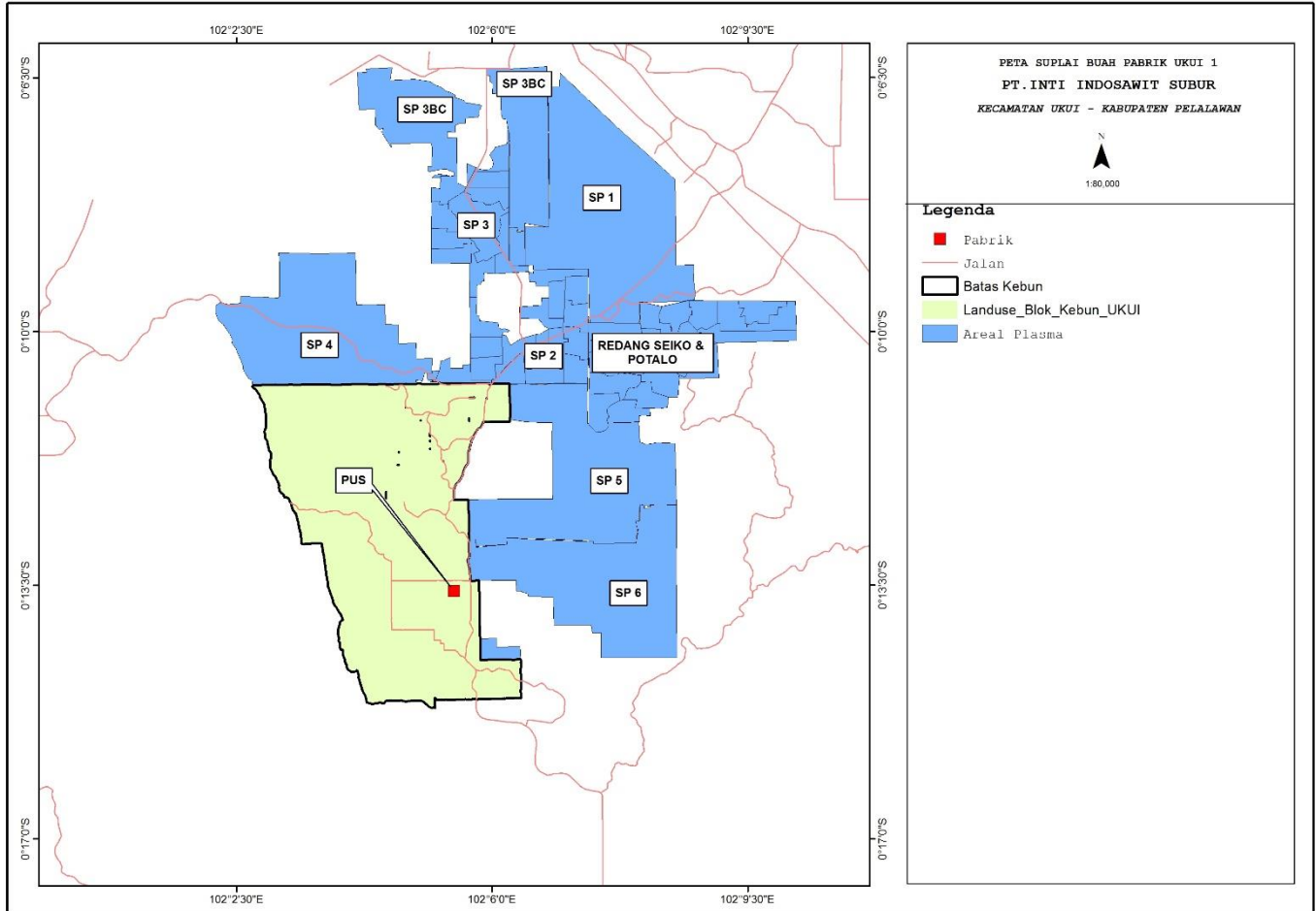
<b>F. Records of Certified CPO &amp; PK Sold under RSPO Credits to Buyers since the last audit (if any)</b>				
<b>No.</b>	<b>Month- Year</b>	<b>Buyers Name</b>	<b>PalmTrace Trading License Number</b>	<b>RSPO Credits of Certified CPO or PK Sold (mt)</b>
		N/A		

**Note:**

**Appendix E: Location Map of Ukui I POM and its supply bases in Provincial Imagery**



**Appendix F: Estate Field Map**



**Appendix G: List of Smallholder Sampled**

SP	HAMP	NO KAPLIN	PEMILIK AWAL	NAMA PEMILIK / PENGELOLA SEKARANG	KUD	sample year	No. SHM	Tanggal terbit
3BC	1	834	MATNUR	MATNUR	KARYA BERSAMA	2019	0830	09-09-91
3BC	1	835	SALMAN	SALMAN	KARYA BERSAMA	2019	0753	09-09-91
3BC	1	845	UNDANG R	SUMAD	KARYA BERSAMA	2019	0254	09-09-91
3BC	1	844	AHMAD TAUFIK	AHMAD TAUFIK	KARYA BERSAMA	2019	0799	09-09-91
3BC	11	1003	SURYANI	SURYANI	KARYA BERSAMA	2019	0329	09-09-91
3BC	13	239	RAKIYO	RAKIYO	KARYA BERSAMA	2019	0775	09-09-91
3BC	13	271	EDI SUPRIYATNO	EDI SUPRIYATNO	KARYA BERSAMA	2019	0838	09-09-91
3BC	14	277	KLIWON	KLIWON	KARYA BERSAMA	2019	0279	09-09-91
3BC	14	278	SUPARDI SUPRAPTO	SUPARDI SUPRAPTO	KARYA BERSAMA	2019	5171	09-09-91
3BC	14	279	SISWO DIHARJO/JAYUS	SISWO DIHARJO/JAYUS	KARYA BERSAMA	2019	0773	09-09-91
3BC	14	289	SOMIRAN	SOMIRAN	KARYA BERSAMA	2019	0055	25/1/1994
3BC	14	296	SAKUP	H GITO	KARYA BERSAMA	2019	0294	09-09-91
3BC	14	297	SUTRISNO HERIYANTO	IRIYANTI	KARYA BERSAMA	2019	0375	09-09-91
6A	124	2348	W A G E	W A G E	SUMBER BAHAGIA	2019	2022	12 OKTOBER 1993
6A	124	2447	SALIM	SALIM	SUMBER BAHAGIA	2019	2024	12 OKTOBER 1993
6A	124	2346	SURAMIN	NASIRIN	SUMBER BAHAGIA	2019	2028	12 OKTOBER 1993
6A	124	2448	LEGIMAN	PD SIAHAAN	SUMBER BAHAGIA	2019	2035	12 OKTOBER 1993
6A	124	2347	DARJI	DARJI	SUMBER BAHAGIA	2019	2036	12 OKTOBER 1993
6A	124	2452	A N A S	M ASRORI	SUMBER BAHAGIA	2019	2040	12 OKTOBER 1993
6A	124	2449	SULIONO	SULIONO	SUMBER BAHAGIA	2019	2186	25 JANUARI 1994
6A	124	2345	RUSDI	RUSDI	SUMBER BAHAGIA	2019	2037	12 OKTOBER 1993
6A	125	2350	EMAN SULAIMAN	SUGIMAN	SUMBER BAHAGIA	2019	1931	12 OKTOBER 1993
6A	125	2341	HENDI FAHROZI	SUBARI	SUMBER BAHAGIA	2019	1940	12 OKTOBER 1993
6A	125	2482	TEGUH SANTOSO	TEGUH SANTOSO	SUMBER BAHAGIA	2019	1933	12 OKTOBER 1993
6A	125	2439	ABDUL CHOIRI	TEGUH SANTOSO	SUMBER BAHAGIA	2019	1934	12 OKTOBER 1993
6A	125	2339	A J I	A J I	SUMBER BAHAGIA	2019	1938	12 OKTOBER 1993
6A	125	2441	PURNOMO	MARTO S	SUMBER BAHAGIA	2019	1939	12 OKTOBER 1993
6A	125	2440	BASORI	BUDIONO	SUMBER BAHAGIA	2019	1941	12 OKTOBER 1993
6A	125	2342	SUWITO	SUWITO	SUMBER BAHAGIA	2019	1942	12 OKTOBER 1993
6A	125	2340	SUHADI	SUHADI	SUMBER BAHAGIA	2019	1943	12 OKTOBER 1993
6A	125	2464	S A R K I	S A R K I	SUMBER BAHAGIA	2019	2174	12 OKTOBER 1993
6A	125	2465	YULIADI	NINIT	SUMBER BAHAGIA	2019	2175	12 OKTOBER 1993
6A	125	2438	KATEMIN	KATEMIN	SUMBER BAHAGIA	2019	2176	12 OKTOBER 1993
6A	278	2463	BOIMIN	BOIMIN	SUMBER BAHAGIA	2019	41	23 OKTOBER 1995
6A	280	4761	B O N A R	JUALIADI	SUMBER BAHAGIA	2019	30	23 OKTOBER 1995
6A	280	4765	BINSAR	BINSAR	SUMBER BAHAGIA	2019	35	23 OKTOBER 1995
6A	280	4787	EFENDI	BAJURI	SUMBER BAHAGIA	2019	22	23 OKTOBER 1995
6A	280	4764	SUTRISNO B	SUNARTO	SUMBER BAHAGIA	2019	23	23 OKTOBER 1995
6A	280	4766	KASAM	PURWADI	SUMBER BAHAGIA	2019	24	23 OKTOBER 1995
6A	280	4785	NURWITO	NURKHOLIS	SUMBER BAHAGIA	2019	25	23 OKTOBER 1995
6A	280	4786	AGUS SUTIONO	AGUS SUTIONO	SUMBER BAHAGIA	2019	27	23 OKTOBER 1995
R.SEKO	293	6185	UDUT/TUTI	UDUT/TUTI	USAHA BARU	2019	1323	13/9/2001
R.SEKO	293	6246	ATAN MONYONG	ATAN MONYONG	USAHA BARU	2019	1325	13/9/2001
R.SEKO	293	6142	BASRI	BASRI	USAHA BARU	2019	1327	13/9/2001
R.SEKO	293	6247	TINIT	TINIT	USAHA BARU	2019	1329	13/9/2001
R.SEKO	293	6141	LESA	ANTO	USAHA BARU	2019	1339	13/9/2001
R.SEKO	294	6192	ALIDAR	JUFRIANTO	USAHA BARU	2019	1121	13/09/2001
R.SEKO	294	6188	TOHER	SUTRISNO	USAHA BARU	2019	1124	13/9/2001
R.SEKO	294	6139	SITI RIA	SITI RIA	USAHA BARU	2019	1128	13/9/2001
R.SEKO	294	6191	TIANA	MALI	USAHA BARU	2019	1125	13/9/2001
R.SEKO	294	6189	KARI	KARI	USAHA BARU	2019	1141	13/9/2001
R.SEKO	303	6318	ABU TALIP	SYAMSURI	USAHA BARU	2019	1247	13/9/2001
R.SEKO	303	6316	ANTO	ANTO	USAHA BARU	2019	1268	13/9/2001
R.SEKO	304	6445	TALIOME	SUWANTO MARTINUS. S	USAHA BARU	2019	1296	13/9/2001
R.SEKO	304	6449	MUSLIADI	H SAKIMUN	USAHA BARU	2019	1308	13/9/2001
R.SEKO	304	6323	MAHSAR	MAHSAR	USAHA BARU	2019	1308	13/9/2001
R.SEKO	304	6446	ISAR	ISAR	USAHA BARU	2019	1315	13/9/2001
R.SEKO	306	6355	MANGKESA	SIMAN	USAHA BARU	2019	1206	13/9/2001
R.SEKO	306	6353	NOTER	SAIMIN	USAHA BARU	2019	1213	13/9/2001

## 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
KLU	<i>Kebun Luar Ukui</i> / Ukui Outside Estate
KUD	<i>Koperasi Unit Desa</i> / Smallholder Cooperation
LD50	Lethal Dose for 50 sample
LSU	Leaf Sampling Unit
LTDS	Light Tenera Dry Separating
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
QC	Quality Control
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
SSU	Soil Sampling Unit
TUS	<i>Tim Unit Semprot</i> / Chemical Weeding Team

USB	Unstrip Bunch
USDA	United States Department of Agriculture
VA	Visit Agronomy
VE	Visit Engineering
WHO	World Health Organization
ZA	<i>Zwavelzure Ammoniak</i> / Amonium Sulfate