

RSPO PRINCIPLE AND CRITERIA PUBLIC SUMMARY REPORT

☐ Initial Assessment

☒ Annual Surveillance Assessment (1_3)

☐ Recertification Assessment (Choose an item.)

☐ Extension of Scope

Client Company Name / Parent Company: PT Inti Indosawit Subur
Client Company / Parent Company Address: Jl Palembang Kav 35 – 37, Jakarta 10230, Indonesia
Certification Unit: PT Indo Sepadan Jaya – Tanjung Selamat Palm Oil Mill Location of Certification Unit: Kampung Padang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatera Province, Indonesia
Date of Final Report: 14/10/2024

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Section 1: Scope of the Assessment

1. Company Details			
Parent Company	PT. Inti Indosawit Subur		
RSPO Membership Number	1-0022-06-000-00	Membership Approval Date	06/02/2006
Address	Jl Palembang Kav 35 – 37, Jakarta 10230, Indonesia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	PT Indo Sepadan Jaya – Tanjung Selamat Palm Oil Mill		
Location / Address	Kampung Padang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatera Province, Indonesia		
Website	www.asianagri.com		
Management Representative	Mr. Ivan Novrizaldie	E-mail	Ivan_novrizaldie@asianagri.com
Telephone	(+62) 21 2301119	Facsimile	(+62) 21 2301120

2. Certification Information			
Certificate Number	RSPO 620704	Certificate Start Date	24/08/2021
Date of First Certification	26/05/2015	Certificate Expiry Date	23/08/2026
Scope of Certification	Production of Sustainable Crude Palm Oil (CPO) and Palm Kernel (PK)		
Visit Objectives	<ul style="list-style-type: none"> Determination of the conformity of the client's management system, or parts of it, with audit criteria. Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements. 		
Assessment Cycle	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 1_3) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input checked="" type="checkbox"/> Indonesia National Interpretation 2020 of the RSPO P&C 2018		
Supply Chain Module	<input type="checkbox"/> Identity Preserved; <input checked="" type="checkbox"/> Mass Balance	Mill Capacity	60 MT/hour
ISH certification Phase	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input type="checkbox"/> Not Applicable		
Is this a remote audit or on-site audit	<input checked="" type="checkbox"/> On-site audit (Option AI)	<input type="checkbox"/> On-site audit (Option AII)	<input type="checkbox"/> Remote audit (Option B)

3. Other Certifications

Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
ID05/65250	ISO 14001:2015	SGS Indonesia	10/06/2026
EU-ISCC-Cert- DE100-02727123	ISCC	SGS Indonesia	07/07/2024
BSI-ISPO-619189	ISPO	BSI Indonesia	21/03/2024

4. Location(s) of Mill & Supply Bases

Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Tanjung Selamat Mill	Kampung Padang Village, Bilah Hilir District, Labuhanbatu Regency, North Sumatera, Indonesia	02° 07' 39.72" N	100° 00' 08.82" E
Tanjung Selamat Estate	Kampung Padang Village, Bilah Hilir District, Labuhanbatu Regency, North Sumatera, Indonesia	02° 07' 49.49" N	100° 06' 14.71" E
Pangkatan Estate	Sennah Village, Bilah Hilir District, Labuhanbatu Regency, North Sumatera, Indonesia	02° 11' 57.57" N	100° 00' 53.63" E

5. Description of Supply Base

New Planting Development	<input checked="" type="checkbox"/> No		<input type="checkbox"/> Yes		
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Tanjung Selamat Estate	3,858	6.57	36.75	3,901.32	98.89
Pangkatan Estate	3,667	110.91	558.09	4,336.00	84.57
Total	7,525	117.48	594.84	8,237.32	91.35
Note:					

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6. Plantings & Cycle

Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Tanjung Selamat Estate	-	3,858	-	-	3,858	-
Pangkatan Estate	-	3,667	-	-	3,667	-
Total (ha)	-	7,525	-	-	7,525	-

Note: Only Mature area is considered as production area

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

Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Aug 2023 – July 2024)	Actual (May 2023 – Apr 2024)		Forecast (Aug 2024 – Jul 2025)
		Previous license period (May 2023 – Sep 2023)	Current license period (Oct 2023 - Apr 2024)	
Tanjung Selamat Estate	115,277.00	49,801.65	56,144.56	106,995.00
Pangkatan Estate	65,258.00	40,665.39	54,923.40	95,263.00
Total	180,535.00	201,535.00		202,258.00

Note:

i) Extended volume: FFB 21,000MT, CSPO 5,100 MT, CSPK 950MT

ii) Justification is due to the oil palm is in mature age, in productive period, and the actual for last year has reached that number.

8. Summary of Certified Tonnage of FFB (from other certified unit(s))

Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (Aug 2023 – July 2024)	Actual (May 2023 – Apr 2024)		Forecast (Aug 2024 – Jul 2025)
		Previous license period (May 2023 – Sep 2023)	Current license period (Oct 2023 - Apr 2024)	
NIL		NIL	NIL	
Total		NIL		

Note:

9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage (MT) / year			
	(Aug 2023 – July 2024)	Actual (May 2023 – Apr 2024)		Forecast (Aug 2024 – Jul 2025)
		Previous license period (May 2023 – Sep 2023)	Current license period (Oct 2023 - Apr 2024)	
3 rd Party (CV TTPS, Roma, IWH, MHS, CV Palta Jaya, WJD, WJD-KS)	120,000	10,976.60	16,141.32	110,000
CSV – Koperasi Tani Mandiri	-	33,594.62	48,473.84	-
Total	120,000	109,186.38		110,000
Note:				

9A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	Month - Year	Volume of FFB from certified supply base (mt)	Volume of FFB from uncertified supply base (mt)	Total FFB/Month (mt)
1	May 2023	15,662.28	6,120.15	21,782.43
2	June 2023	14,210.38	9,317.81	23,528.19
3	July 2023	19,401.33	11,403.93	30,805.26
4	August 2023	20,222.60	9,615.00	29,837.60
5	September 2023	20,970.45	8,114.32	29,084.77
6	October 2023	20,062.29	8,083.40	28,145.69
7	November 2023	17,233.87	10,549.20	27,783.07
8	December 2023	15,342.54	10,375.21	25,717.75
9	January 2024	15,364.54	9,415.42	24,779.96
10	February 2024	13,385.97	9,418.78	22,804.75
11	March 2024	15,055.95	8,090.19	23,146.14
12	April 2024	14,622.80	8,682.97	23,305.77
TOTAL		201,535.00	109,186.38	310,721.38
Note:				

10. Summary of Certified Tonnage (MT) (not applicable for ISS)				
Estimated last year (Aug 2023 – July 2024)	Actual (May 2023 – Apr 2024)		Forecast (Aug 2024 – Jul 2025)	
	Previous license period (May 2023 – Sep 2023)	Current license period (Oct 2023 - Apr 2024)		
FFB	FFB		FFB	
201,535.00 mt* (180,535.00 mt+21,000.00 mt)	90,467.04 mt	111,067.96 mt	202,258.00 mt	
	TOTAL	201,535.00 mt		
CPO (OER: 21.58 %)	CPO (OER: 21.58 %)		CPO (OER: 21.71%)	
43,499.80 mt* (38,399.80 mt + 5100.00 mt)	19,476.26 mt	24,023.14 mt	43,912.00 mt	
	TOTAL	43,499.40 mt		
PK (KER: 4.37 %)	PK (KER: 4.04 %)		PK (KER: 4.15 %)	
8803.27 mt* (7,853.27 mt+950.00 mt)	3,552.88 mt	4,601.44 mt	8,393.00 mt	
	TOTAL	8,154.32 mt		
Note:				
i) * Extended volume: FFB 21,000MT, CSPO 5,100 MT, CSPK 950MT				
ii) Justification is due to the oil palm is in mature age, in productive period, and the actual for last year has reached that number.				

10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	May 2023	3,478.40	579.66
2	June 2023	2,993.36	587.40
3	July 2023	4,034.78	766.98
4	August 2023	4,372.02	801.46
5	September 2023	4,597.70	817.38
6	October 2023	4,395.52	809.42
7	November 2023	3,693.64	706.93
8	December 2023	3,227.19	665.05
9	January 2024	3,272.82	639.23
10	February 2024	2,938.75	563.89
11	March 2024	3,336.14	606.46
12	April 2024	3,159.08	610.46
TOTAL		43,499.40	8,154.32
Note:			

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11. Summary of Actual Volume sold					
Current License period (Oct 2023 - Apr 2024)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	22,920.96	1,549.27	0	0	24,470.23
PK (MT)	4,469.65	0	0	0	4,469.65
Credits	-	-	-	-	-
Previous License period (May 2023 – Sep 2023)					
CPO (MT)	18,536.51	0	0	0	18,536.51
PK (MT)	3,659.83	0	0	0	3,659.83
Credits	-	-	-	-	-
Note: Conventional is RSPO certified material but sold as non-RSPO.					

11A. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any)				
No.	Buyers Name	PalmTrace Trading License Number	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	PT. Sari Dumai Sejati		41,457.47	-
2	PT. SMA – KCP PAN		-	8,129.48
TOTAL			41,457.47	8,129.48
Note:				

11B. Records of certified CPO & PK Sold under other schemes since the last audit (if any)				
No.	Buyers Name	Scheme Name	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	PT. Sari Dumai Sejati	ISCC	1,549.27	-
TOTAL			1,549.27	-
Note:				

11C. Records of CPO & PK Sold as conventional since the last audit (if any)			
No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)
	NIL	NIL	NIL
TOTAL		NIL	NIL
Note:			

11D. Records of Certified CPO Sold under RSPO Credits since the last audit (if any)			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold
	NIL	NIL	NIL
TOTAL			NIL
Note:			

12. Independent Smallholders Certified Tonnage (MT) / Volume									
	Estimated last year (Aug 2023 – July 2024)			Actual (May 2023 – Apr 2024)			Forecast (Aug 2024 – Jul 2025)		
Phase	Eligibility	MS A	MS B	Eligibility	MS A	MS B	Eligibility	MS A	MS B
	40%	70%	100%	40%	70%	100%	40%	70%	100%
FFB			N/A			N/A			N/A
IS-CSPO	-	-		-	-		-	-	
IS-CSPKO	-	-		-	-		-	-	
IS-CSPKE	-	-		-	-		-	-	
CSPK	-	-		-	-		-	-	

12A. Monthly Records of Certified CPO, PK & PKE (equivalent) produced since the last audit						
No.	Month - Year	FFB (MT)	Certified CPO (MT)	Certified PK (MT)	Certified PKO (MT)	Certified PKE (MT)
	NIL					
TOTAL						
Note: 1 mt = 1 credit						

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13. Independent Smallholders Actual Sold Tonnage / Volume							
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	CSPK	IS-CSPKO	IS-CSPKE
Current License period (Oct 2023 - Apr 2024)							
Credits				-	-	-	-
Physical	-	-	-				
Previous License period (May 2023 – Sep 2023)							
Credits				-	-	-	-
Physical	-	-	-				

13A. Records of Certified FFB, CPO, PK & PKE (including credits) sold since the last audit							
No.	Buyers Name	PalmTrace Trading License Number	FFB Sold (MT)	Certified CPO Sold (MT/credit)	Certified PK Sold (MT/credit)	Certified PKO Sold (MT/credit)	Certified PKE Sold (MT/credit)
	NIL	-	-	-	-	-	-
TOTAL							
Note:							

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn. Bhd. (ASI Accreditation Number: ASI-ACC-067)
Suite 29.01 Level 29, The Gardens North Tower,
Mid Valley City, Lingkaran Syed Putra,
59200 Kuala Lumpur, Malaysia.
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Website: www.bsigroup.com

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2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on **7-10 May 2024**. The audit programme is included as Section 2.3. Where applicable, prior to the initial certification and recertification audit, 30 days Public Notification was made through the RSPO and BSI website.

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

The Critical NC close out on-site assessment was conducted on **17 July 2024**. The audit programs 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. Indonesia National Interpretation 2020 of the RSPO P&C 2018 was used as the normative reference to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

The minimum sample size is four estates. Sample size for certification unit with more than four (4) estates were determined based on formula $N = (\sqrt{y}) \times (z)$ where y is the number of estates and where z is the multiplier defined by risk assessment. While, the sampling of smallholders were based on the formula $(\sqrt{y}) \times (z)$; where y is total number of group member and where z is the multiplier defined by the risk assessment. The sampled smallholder listed in Appendix E.

Meetings were held with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and these have been incorporated into the assessment findings.

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Section 3.4.

The non-conformities for this audit are detailed in Section 3.3 and unless it is stated in this section, all previous nonconformities including minor nonconformities are remains closed.

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This report is structured to provide a summary of assessment finding as provided in Appendix A. The assessment was conducted based on risk based approach sampling and therefore nonconformities may exist.

For Initial, Re-certification and Extension of Scope assessment, the report was externally reviewed by approved external peer reviewer prior to certification decision by BSI.

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

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Re- Certification)	Year 2 (ASA1-1)	Year 3 (ASA1-2)	Year 4 (ASA1-3)	Year 5 (ASA1-4)
Tanjung Selamat Mill	X	X	X	X	X
Tanjung Selamat Estate	X	X	X	X	X
Pangkatan Estate	X	X	X	X	X

Tentative Date of Next Visit: May 5, 2025 - May 7, 2025

Total Number of Mandays: 12 mandays

2.2 BSI Assessment Team

Name	Role	Competency
Nanang Rusmana	Team Leader	<p>Education: Holds a Bachelor Degree of Forestry, Bogor Agricultural University (IPB)</p> <p>Work Experience: 5 years working experience in palm oil industry as SHE Assistant at PT. Astra Agro Lestari Tbk. 3 years working experience in mining industry as Environment Coordinator and SHE Coordinator with PT. Kapuas Prima Coal Group. 6 years working experience as RSPO/ISPO Lead auditor.</p> <p>Training attended: Completed ISO 9001:2015 Lead Auditor Course, ISPO Auditor Course, ISO 14001:2015 Lead Auditor Course, ISO 45001:2018 Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, Endorsed RSPO Supply Chain Certification Lead Auditor Course, SMK3 Auditor Course, HCV Assessor Course, General OHS Expert Course, SMETA Requirements training.</p> <p>Language proficiency: Fluent in Bahasa Indonesia and English</p> <p>Aspect covered in this audit:</p> <p><input checked="" type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety <input type="checkbox"/> Supply chain requirements</p> <p><input type="checkbox"/> Social <input checked="" type="checkbox"/> Environmental <input type="checkbox"/> Market Communication and claim requirements</p> <p><input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system).</p>

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Imam Fakhrurozi	Team Member	<p>Education: Holds a Bachelor Degree majoring in Agriculture Technology, Gadjah Mada University.</p> <p>Work Experience: 2 years working experience oil palm industry, as a sustainability and HSE officer. 7 years working experience as RSPO Auditor / Lead Auditor</p> <p>Training attended: Completed ISO 9001:2008 Lead Auditor Course, 14001:2004 Lead Auditor Course, SMK3 Lead Auditor Course, Endorsed RSPO P&C Lead auditor course, ISO 45001:2018 Lead Auditor Course, SMETA requirements training, Introductory Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation, RSPO ISH Standard Training and Endorsed RSPO Refresher Courses.</p> <p>Language proficiency: Fluent in Bahasa Indonesia and English</p> <p>Aspect covered in this audit:</p> <p><input type="checkbox"/> Good Agriculture Practice <input checked="" type="checkbox"/> Health and Safety <input checked="" type="checkbox"/> Supply chain requirements</p> <p><input type="checkbox"/> Social <input type="checkbox"/> Environmental <input checked="" type="checkbox"/> Market Communication and claim requirements</p> <p><input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)</p>
Haikal Ramadhan Kharismansyah	Team Member	<p>Education: Holds a Bachelor Degree in Plant Pest and Disease from Padjadjaran University.</p> <p>Work Experience: 3 Years working experience in oil palm industry as Agronomy Assistant. More than five years working experience as RSPO Auditor and RSPO Lead Auditor.</p> <p>Training attended: Completed Endorsed RSPO P&C Lead Auditor Training Course, ISPO Auditor/Lead Auditor Course, RSPO P&C Social and Labour Standards and the Mechanics of Social Auditing Training, ISO 9001:2008, ISO 14001:2015 Auditor/Lead Auditor Course, RSPO ISH Standard Training Course, Endorsed RSPO Supply Chain Lead Auditor Training Course and Endorsed RSPO P&C Lead Auditor Refresher Training Course.</p> <p>Language proficiency: Fluent in Bahasa Indonesia and English</p> <p>Aspect covered in this audit:</p> <p><input type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety <input type="checkbox"/> Supply chain requirements</p> <p><input checked="" type="checkbox"/> Social <input type="checkbox"/> Environmental <input type="checkbox"/> Market Communication and claim requirements</p> <p><input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)</p>

Accompanying Persons:

Name	Role
Nil	-

2.3 Assessment Plan

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

Date	Time	Subjects	NR	HRK	IF
Monday, 06/05/2024	07.30 – 09.15	Flight Jakarta – Kualanamu 07.00 – 09.30 (GA-182)	√	√	√
	09.30 – 17.00	Travelling Kualanamu – PT Indo Sepadan Jya – Tanjung Selamat POM	√	√	√
Tuesday, 07/05/2024	08.00 – 09.00	Opening Meeting - Presentation by PT Indo Sepadan Jaya – Tanjung Selamat POM & Supply Bases - Presentation by Lead Auditor	√	√	√
	09.00 – 12.00	Field Visit to Tanjung Selamat Estate: - Herbicide application programmes, harvesting, fertilizing operations, water management, road maintenance, terracing, etc. - Agrochemical stores, Fertilizer store, workshops, housing, landfill, clinic, HCV, riparian zones, Hazardous Waste, waste management, etc. - Boundaries inspection, worker interviews, social amenities, etc. - Interview with: Labor Union and Gender Committee.	√	√	√
	09.00 – 15.00	Stakeholder consultation: Local Government of Labuhan Batu Regency (DLH, Disbun, Disnakertrans & BPN), Village Head, surrounding community, previous land owner/user, NGO, contractor.		√	
	12.00 – 14.00	Break	√	√	√
	14.00 – 16.30	Field Visit to Tanjung Selamat POM: - Inspection of processing, warehouse, workshop, mill wastes management, effluent ponds, OHS, environment issues, POME application, workers interview, Supply Chain for CPO mill, review on SEIA documents and records, document review, etc. - Audit Supply Chain for CPO Mills including Market Communication and Claim requirements (RSPO SCCS) - Interview workers.	√	√	√
	16.30 – 17.00	Reporting	√	√	√

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Wednesday, 08/05/2024	08.00 – 12.00	Field Visit to Pangkatan Estate: <ul style="list-style-type: none"> - Herbicide application programmes, harvesting, fertilizing operations, water management, road maintenance, terracing, etc. - Agrochemical stores, Fertilizer store, workshops, housing, landfill, clinic, HCV, riparian zones, Hazardous Waste, waste management, etc. - Boundaries inspection, worker interviews, social amenities, etc. - Interview with: Labor Union and Gender Committee. 	√	√	√
	12.00 – 14.00	Break	√	√	√
	14.00 – 16.30	Document Review Pangkatan Estate: <ul style="list-style-type: none"> - Occupational Health and Safety, HCV, Environment Aspect, time bound plan. - Social Aspect and workers welfare, worker consultation, Stakeholder consultation, impact assessments, policies. - Best Management Practice for Estate. - Operation Procedure, organization commitments, Legal compliance, continuous improvement, long term business plan. 	√	√	√
	16.30 – 17.00	Reporting	√	√	√
Thursday, 09/05/2024	08.00 – 12.00	Document Review Tanjung Selamat POM & Tanjung Selamat Estate: <ul style="list-style-type: none"> - Occupational Health and Safety, HCV, Environment Aspect, time bound plan. - Social Aspect and workers welfare, worker consultation, Stakeholder consultation, impact assessments, policies. - Best Management Practice for Mill and supply chain for mill including Market Communication and Claim requirements. - Operation Procedure, organization commitments, Legal compliance, continuous improvement, long term business plan. 	√	√	√
	12.00 – 14.00	Break	√	√	√
	14.00 – 16.30	Audit Continue for document review Tanjung Selamat POM and Estates.	√	√	√
	16.30 – 17.00	Reporting	√	√	√
	08.00 – 12.00	Audit Continue for document review Tanjung Selamat POM and Estates.	√	√	√
Friday, 10/05/2024	12.00 – 14.00	Break	√	√	√
	14.00 – 14.30	Preparation	√	√	√
	14.30 – 15.30	Closing Meeting	√	√	√
	15.30 – 22.00	Travelling Kualanamu – Tanjung Selamat POM - PT Indo Sepadan Jaya	√	√	√
	22.00	Stay at Kualanamu	√	√	√

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Date	Time	Subjects	NR	HRK	IF
Saturday, 11/05/2024	05.25 – 07.50	Flight Kualanamu - Jakarta 05.25 – 07.50 (GA-183)	√	√	√

NCR Close out Visit Assessment Plan

Date	Time	Subjects	NR
Wednesday, 17/07/2024	08.00 – 09.00	Opening meeting	√
	09.00 – 12.00	Field verification	√
	12.00 – 14.00	Break	√
	14.00 – 16.00	Document verification, interview with workers	√
	16.00 – 17.00	Closing Meeting	√

Section 3: Assessment Findings

3.1 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?	PT Inti Indosawit Subur 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.	Complied
Have all the estates and mills certified within five (5) years after obtaining RSPO membership? If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021	There are remaining mill and estates that have not certified yet, Bahilang Estate (Supply bases for Tanah Datar Mill) planned in year 2024 due to still in process of RACP. Teluk Panjie Estate (801ha) as supply bases for Teluk Panjie Mill planned in 2026 due to HGU still in process. Sentral Estate (Supply bases for Gunung Melayu II POM planned in 2024 due to still in process of RACP. Revision of TBP has been approved by RSPO on 19/04/2023	Complied
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available. If no, has RSPO Secretariat approval obtained? Was the submission according to	No, there is no new acquisition conducted by PT Inti Indosawit Subur and its subsidiary.	Complied

the template as announced by the RSPO Secretariat on 21/12/2021.		
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	<p>Yes, there is time bound plan revision dated 19 April 2023, signed by Management Representative. Justification available, it caused:</p> <ul style="list-style-type: none"> • Topaz Estate (Supply Bases for Topaz POM) with area 230 Ha the HGU is still on proses to Local Government and BPN Pusat, so the plan year for certification is 2026. • Bahilang Estate (Supply Bases for Tanah Datar Mill) with area 1,019 Ha the concept note still on progress and submit to RACP team at Q2 2023. Target to conduct audit at Q1 2024. • Teluk Panji Estate (Supply Bases for Teluk Panjie POM) with area 801 Ha the HGU still on progress since the estate under 2 different provinces, the final approval must come from National Authority (BPN Pusat). Target to conduct audit in 2026. • Sentral Estate (Supply Bases for Gunung Melayu II POM) with area 2,996 Ha. Concept Note still on Progress and submit to RaCP team at Q2 2023. Target to conduct audit at Q1 2024. <p>Revision of TBP has been approved by RSPO on 19/04/2023.</p>	Complied
<p>Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required.</p> <p>Is this consistent with the ACOP reporting?</p>	<p>Yes, there is time bound plan revision dated 19 April 2023, signed by Management Representative. Justification available, it caused:</p> <ul style="list-style-type: none"> • Topaz Estate (Supply Bases for Topaz POM) with area 230 Ha. the HGU is still on proses to Local Government and BPN Pusat, so the plan year for certification is 2026. • Bahilang Estate (Supply Bases for Tanah Datar Mill) with area 1,019 Ha the concept note still on progress and submit to RACP team at Q2 2023. Target to conduct audit at Q1 2024. • Teluk Panji Estate (Supply Bases for Teluk Panjie POM) with area 801 Ha the HGU still on progress since the estate under 2 different provinces, the final approval must come from National Authority (BPN Pusat). Target to conduct audit in 2026. • Sentral Estate (Supply Bases for Gunung Melayu II POM) with area 2,996 Ha. Concept Note still on Progress and submit to RaCP team at Q2 2023. Target to conduct audit at Q1 2024. <p>Revision of TBP has been approved by RSPO on 19/04/2023.</p>	Complied

Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	<p>There is not any isolated lapses in implementation of the plan. There are the changing on the plan due to RaCP process in Bahilang Estate and Sentral Estate and HGU issuance process for Teluk Panji Estate. Status of uncertified units :</p> <ul style="list-style-type: none"> Topaz Estate (Supply Bases for Topaz POM) with area 230 Ha. the HGU is still on proses to Local Government and BPN Pusat, so the plan year for certification is 2026. Bahilang Estate (Supply Bases for Tanah Datar Mill) with area 1,019 Ha the concept note still on progress and submit to RACP team at Q2 2023. Target to conduct audit at Q1 2024. Teluk Panji Estate (Supply Bases for Teluk Panjie POM) with area 801 Ha the HGU still on progress since the estate under 2 different provinces, the final approval must come from National Authority (BPN Pusat). Target to conduct audit in 2026. Sentral Estate (Supply Bases for Gunung Melayu II POM) with area 2,996 Ha. Concept Note still on Progress and submit to RaCP team at Q2 2023. Target to conduct audit at Q1 2024. <p>Revision of TBP has been approved by RSPO on 19/04/2023.</p>	Complied
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised	<p>There is no fundamental failure to proceed with implementation of the plan. Company has taken action to proceed all uncertified unit to complete the RaCP and to obtain the HGU for Teluk Panji Estate.</p> <p>Topaz Estate (Supply Bases for Topaz POM) with area 230 Ha the HGU is still on proses to Local Government and BPN Pusat, so the plan year for certification is 2026.</p>	Complied
Un-Certified Units or Holdings		
No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12.	<p>According to Land Use change analysis, there are several area conversion cacao plantation in Bahilang Estate and Sentral Estate, no primary forest.</p> <p>Bahilang Estate (PT Nusa Pusaka Kencana/NPK). RaCP still under Process. Concept Note still on Progress and submit to RaCP team at Q2 2023. Target to conduct audit at Q1 2024.</p> <p>Sentral Estate (PT Gunung Melayu). RaCP still under Process. Certification audit will be planned on 2024. LUCA submission has been sent on 28 Dec 2020, latest update from RSPO email dated 18 March 2021 to company, LUCA still under review and report needs clarification and still follow up by company.</p> <p>Update for Sentral Estate : Concept Note still on Progress and submitted to RaCP team at Q2 2023.</p>	Complied

	<p>Teluk Panji Estate. HGU for this unit has not been obtained and still under process. Certification audit will be planned on 2026. Latest updated April 2023, HGU still on Progress, since the estate under 2 different province, the final approval must come from National Authority (BPN Pusat).</p> <p>Topaz Estate (Supply Bases for Topaz POM) with area 230 Ha. the HGU is still on proses to Local Government and BPN Pusat, so the plan year for certification is 2026.</p> <p>Revision of TBP has been approved by RSPO on 19/04/2023.</p>	
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	<p>According to Land Use change analysis, there are several area conversion cacao plantation in Bahilang Estate and Sentral Estate, no primary forest.</p> <ul style="list-style-type: none"> Bahilang Estate (PT Nusa Pusaka Kencana/NPK). RaCP still under Process. Concept Note still on Progress and submit to RaCP team at Q2 2023. Target to conduct audit at Q1 2024. Sentral Estate (PT Gunung Melayu). RaCP still under Process. Certification audit will be planned on 2024. LUCA submission has been sent on 28 Dec 2020, latest update from RSPO email dated 18 March 2021 to company, LUCA still under review and report needs clarification and still follow up by company. Teluk Panji Estate. HGU for this unit has not been obtained and still under process. Certification audit will be planned on 2026. Latest updated April 2023, HGU still on Progress, since the estate under 2 different province, the final approval must come from National Authority (BPN Pusat) Topaz Estate (Supply Bases for Topaz POM) with area 230 Ha. the HGU is still on proses to Local Government and BPN Pusat, so the plan year for certification is 2026. 	Complied
Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.	<p>According to internal audit result on December 2020, there is no land conflict occur in PT Mitra Unggul Pusaka – Segati Mill. In addition, the company has been certified for ISPO (Indonesian Sustainable Palm Oil) since December 2016.</p> <p>According to the RSPO RaCP tracker (https://www.rspo.org/certification/remediation-and-compensation/racp-tracker) update 24 June 2024, PT Inti Indosawit Subur has:</p> <ul style="list-style-type: none"> MU's with potential liabilities: 4 units LUCA Submitted (MUs): 4 units LUCA review completed (MUs): 4 units 	Complied

	<ul style="list-style-type: none"> • Concept Note required (MUs): 3 units • Concept Note submitted (MUs): 3 units • Concept Note approved (MUs): 3 units • Compensation Plan submitted (Mus): 0 • Compensation Plan endorsed (MUs): 0 • Remediation Plan required (MUs): 4 units • Remediation Plan submitted (MUs): 1 • Remediation Plan approved (MUs): 0 	
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	<p>Internal audit has conducted for Bahilang Estate on 08-09 February 2022, Teluk Panji Estate on 18-23 February 2022 and Sentral Estate on 22-27 August 2022, there is no Labor disputes occur in this management unit. In addition, the company has been certified for ISPO (Indonesian Sustainable Palm Oil) since December 2016.</p> <p>Update on internal audit:</p> <ul style="list-style-type: none"> • Topaz was on 31 October - 04 November 2023 • Teluk Panji was on 06-11 November 2023 • Sentral Estate was on 08-16 August 2023 • Bahilang Estate was on 14-19 August 2023 <p>Besides that, interview with management representative who assign as PIC for certification was conducted to know the process of internal audit that has been held.</p> <p>There are no ongoing case/s of grievances or complaint based on RSPO Complaint tracker (https://askrspo.force.com/Complaint/s/casetracker)</p>	Complied
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	<p>Internal audit was conduct frequently in annual basis.</p> <p>Internal audit has conducted for Bahilang Estate on 08-09 February 2022, Teluk Panji Estate on 18-23 February 2022 and Sentral Estate on 22-27 August 2022, there is no legal non-compliance occur in this management unit. In addition, the company has been certified for ISPO (Indonesian Sustainable Palm Oil) since December 2016.</p> <p>Update on internal audit:</p> <ul style="list-style-type: none"> • Topaz was on 31 October - 04 November 2023 • Teluk Panji was on 06-11 November 2023 • Sentral Estate was on 08-16 August 2023 • Bahilang Estate was on 14-19 August 2023 	Complied
Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement	Internal audit was conduct frequently in annual basis.	Complied

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<p>and covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.</p>	<p>Internal audit has been conducted for Bahilang Estate on 08-09 February 2022, Teluk Panji Estate on 18-23 February 2022 and Sentral Estate on 22-27 August 2022.</p> <p>Update on internal audit:</p> <ul style="list-style-type: none"> • Topaz was on 31 October - 04 November 2023 • Teluk Panji was on 06-11 November 2023 • Sentral Estate was on 08-16 August 2023 • Bahilang Estate was on 14-19 August 2023 <p>Report of internal audit are available. Result of internal audit:</p> <ul style="list-style-type: none"> - Bahilang Estate, Teluk Panji Estate and Sentral Estate has complied to relevant regulation, no issue regarding the legal compliance. - No complaint or grievances and disputes from stakeholders and affected parties. - No labor disputes occur since the latest audit. - No land conflict: Documents related to the history of land tenure and the actual legal or customary use of the land are available. <p>No new plantings are established on local people's land and no HCV area replacement.</p>	
<p>Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?</p>	<p>According to internal audit result, there is no Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates.</p> <p>According to the RSPO RaCP tracker (https://www.rspo.org/certification/remediation-and-compensation/racp-tracker) update 24 June 2024, PT Inti Indosawit Subur has:</p> <ul style="list-style-type: none"> • MU's with potential liabilities: 4 units • LUCA Submitted (MUs): 4 units • LUCA review completed (MUs): 4 units • Concept Note required (MUs): 3 units • Concept Note submitted (MUs): 3 units • Concept Note approved (MUs): 3 units • Compensation Plan submitted (Mus): 0 • Compensation Plan endorsed (MUs): 0 • Remediation Plan required (MUs): 4 units • Remediation Plan submitted (MUs): 1 • Remediation Plan approved (MUs): 0 	<p>Complied</p>

	Due to the ongoing process of RaCP, the company has revised its TBP and approved by RSPO on 19/04/2023.	
Have there been any stakeholder (including NGO) consultation conducted?	<p>During internal audit stakeholders consultation already conducted. There is no issue.</p> <p>Update on internal audit:</p> <ul style="list-style-type: none"> • Topaz was on 31 October - 04 November 2023 • Teluk Panji was on 06-11 November 2023 • Sentral Estate was on 08-16 August 2023 • Bahilang Estate was on 14-19 August 2023 	Complied

3.2 Progress of scheme smallholders and/or outgrowers

Progress of scheme smallholders or outgrowers towards compliance with relevant standards		
Requirement	Remarks	Compliance
<p>Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification?</p> <p>OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years.</p>	Yes, PT Inti Indosawit Subur Group has including 100% the scheme smallholder in their certification.	Complied

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Approved Time Bound Plan

Approved by RSPO on 19/04/2023.

Name of Mill	Mill Address	Name of Supply Bases	Location / Address	Time Bound for Certification	Status
Buatan I Mill – PT Inti Indosawit Subur	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau	Buatan Estate	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau	2010	Certified on 16 September 2010 Re-Certified on 16 September 2015 Re-certified in 2020-2021
		Buatan (Plasma)	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau		
Buatan II Mill - PT Inti Indosawit Subur	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau	Simpang Perak Estate*	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau	2010	Certified on 16 September 2010 Re-Certified on 16 September 2015 *Split From Buatan Estate Since 1 January 2019 Re-certified in 2020-2021
		Buatan (Plasma)	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau		
Ukui I Mill - PT Inti Indosawit Subur	Ukui Village, Ukui District, Pelalawan Regency, Riau	Ukui Estate	Ukui Village, Ukui District, Pelalawan Regency, Riau	2011	Certified on 1 March 2011 Re-Certified on 1 March 2016 Re-certified in 2021
		Sei Lala Estate*	Ukui Village, Ukui District, Pelalawan Regency, Riau	2011	*Split From Ukui & Soga Estate Since 1 January 2019, become supply bases of Ukui II Mill Re-certified in 2021

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Name of Mill	Mill Address	Name of Supply Bases	Location / Address	Time Bound for Certification	Status
		Ukui (Plasma)	Ukui & Lubuk Batu Jaya District, Pelalawan & Inhu Regency, Riau	2011	Certified on 1 March 2011 Re-Certified on 1 March 2016 Re-certified in 2021
Ukui II Mill - PT Inti Indosawit Subur	Ukui Village, Ukui District, Pelalawan Regency, Riau	Soga Estate	Ukui Village, Ukui District, Pelalawan Regency, Riau	2011	Certified on 1 March 2011 Re-Certified on 1 March 2016 Re-certified in 2021
		Ukui (Plasma)	Ukui & Lubuk Batu Jaya District, Pelalawan & Inhu Regency, Riau	2011	Certified on 1 March 2011 Re-Certified on 1 March 2016 Re-certified in 2021
Tungkal Ulu Mill - PT Inti Indosawit Subur	Pulau Pauh / Penyabungan / Merlung Village, Tungkal Ulu District, Tanjung Jabung Regency, Jambi	Tungkal Ulu Estate	Pulau Pauh / Penyabungan / Merlung Village, Tungkal Ulu District, Tanjung Jabung Regency, Jambi	2012	Certified on 15 August 2012 Re-Certification in August 2017 Re-certified in 2022
		Tungkal Ulu (Plasma)	Renah Mendalo, Merlung, Muara Papalik District, Tanjung Jabung Barat Regency,	2012	Certified on 15 August 2012 Re-Certification in August 2017 Re-certified in 2022
Muara Bulian Mill - PT Inti Indosawit Subur	Singoan / Bukit Sari / Bulian Jaya Village, Muara Bulian / Pemayung District, Batang Hari Regency, Jambi	Muara Bulian Estate	Singoan / Bukit Sari / Bulian Jaya Village, Muara Bulian / Pemayung District, Batang Hari Regency,	2013	Certified on 12 July 2013 Re-Certification in August 2017 Re-certified in 2022

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Name of Mill	Mill Address	Name of Supply Bases	Location / Address	Time Bound for Certification	Status
		Muara Bulian (Plasma)	Maro Sebo Ilir District, Batanghari Regency, Jambi	2013	Certified on 12 July 2013 Re-Certification in August 2017 Re-certified in 2022
Topaz Mill – PT Tunggal Yunus Estate	Petapahan Village, Tapung District, Kampar Regency, Riau	Topaz Estate	Petapahan Village, Tapung District, Kampar Regency, Riau	2015	Certified on 30 March 2015 Re-certified in 2020
		Topaz Estate (230ha)		2026	HGU is still in Process
Taman Raja Mill – PT Dasa Anugrah Sejati	Lubuk Bernai / Kampung Baru / Pelabuhan Dagang / Pematang Pauh Vilage, Tungkal Ulu District, Tanjung Jabung Regency, Jambi	Taman Raja, Badang & Bernai Estate*	Lubuk Bernai / Kampung Baru / Pelabuhan Dagang / Pematang Pauh Vilage, Tungkal Ulu District, Tanjung Jabung Regency, Jambi	2015	Certified on 20 February 2015 *Bernai Estate Split From Taman Raja & Badang Estate Since 1 January 2019 Re-certified in 2020
Segati Mill – PT Mitra Unggul Pusaka	Langkan / Penarikan / Tambak / Sotol Village, Langgam District, Pelalawan Regency, Riau	Segati Estate	Langkan / Penarikan / Tambak / Sotol Village, Langgam District, Pelalawan Regency, Riau	2022	Certified on 1 November 2022
		Gondai Estate	Pangkalan Sarik / Baru Village, Langgam / Siak Hulu District, Pelalawan / Kampar Regency, Riau	2022	Certified on 1 November 2022
Penarikan Mill – PT Mitra Unggul Pusaka	Penarikan Village, Langgam District, Pelalawan Regency, Riau	Penarikan Estate	Penarikan / Tambak Village, Langgam District, Pelalawan Regency, Riau	2022	Certified on 1 November 2022

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Name of Mill	Mill Address	Name of Supply Bases	Location / Address	Time Bound for Certification	Status
Tanah Datar Mill – PT Supra Matra Abadi	Tanah Datar Petatal Village, Talawi District, Asahan Regency, North Sumatera	Tanah Datar Estate	Tanah Datar Petatal Village, Talawi District, Asahan Regency, North Sumatera	2015	Certified on 18 May 2015 Re-certified in 2020
		Bahilang Estate	Bahilang Village, Tebing Tinggi District, Serdang Bedagai Regency, North Sumatera	2024	*Bahilang Estate on Process RaCP
Aek Nabara Mill – PT Supra Matra Abadi	S1-S3 / Sukadame Village, Bilah Hulu / Kota Pinang District, Labuhan Batu Regency, North Sumatera	Aek Nabara Estate	S1-S3 / Sukadame Village, Bilah Hulu / Kota Pinang District, Labuhan Batu Regency, North Sumatera	2015	Certified on 6 March 2015 Re-certified in 2020
Teluk Panjie Mill – PT Supra Matra Abadi	Teluk Panjie Village, Kampung Rakyat District, Labuhan Batu Regency, North Sumatera	Teluk Panjie Estate (3,885 Ha)	Teluk Panjie Village, Kampung Rakyat District, Labuhan Batu Regency, North Sumatera	2015	Certified on 21 April 2015 Re-certified in 2020
		Teluk Panjie Estate (801 Ha)		2026	HGU is still in Process
Peranap Mill – PT Rigunas Agri Utama	Simelinyang / Pauh Ranap / Sengkilo Village, Peranap District, Indragiri Hulu Regency, Riau	Peranap Estate	Simelinyang / Pauh Ranap / Sengkilo Village, Peranap District, Indragiri Hulu Regency, Riau	2015	Certified on 7 January 2015 Re-certified in 2020
		Peranap (Plasma)		2016	Certified on 18 August 2016 Re-certified in 2021
Bungo Tebo Mill – PT Rigunas Agri Utama	Tuo Sumai / Sungai Rambai Village, PWK Sumai / Tebo Ulu District, Bungo Tebo Regency, Jambi	Bungo Tebo Estate	Tuo Sumai / Sungai Rambai Village, PWK Sumai / Tebo Ulu District, Bungo Tebo Regency, Jambi	2015	Certified on 3 December 2015 Re-certified in 2020
		Bungo Tebo (Plasma)		2017	Certified on 7 February 2017

Name of Mill	Mill Address	Name of Supply Bases	Location / Address	Time Bound for Certification	Status
					Re-certified in 2022
Tanjung Selamat Mill – PT Indo Sepadan Jaya	Kampung Padang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	Tanjung Selamat	Kampung Padang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	2015	Certified on 26 May 2015 Re-certified in 2020
		Pangkatan	Sennah Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	2015	Certified on 26 May 2015 Re-certified in 2020
Gunung Melayu I – PT Saudara Sejati Luhur	Rahuning Village, Bandar Pulau District, Asahan Regency, North Sumatra	Pulau Maria Estate	Rahuning Village, Bandar Pulau District, Asahan Regency, North Sumatra	2015	Certified on 7 September 2015 Re-certified in 2020
Gunung Melayu II – PT Gunung Melayu	Gonting Malaha Village, Bandar Pulau District, Asahan Regency, North Sumatra	Aek Tarum & Batu Anam Estate	Gonting Malaha Village, Bandar Pulau District, Asahan Regency, North Sumatra	2015	Certified on 8 July 2015 Re-certified in 2020
		Sentral Estate		2024	*Sentral Estate on Process RaCP
Negri Lama II Mill – PT Hari Sawit Jaya	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	Negri Lama	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	2016	<ul style="list-style-type: none"> • Certified on 23 December 2016 as Independent Mill • Audit in 2016 as Mill and Supply Base • Re-certified in 2021
		Aek Kuo (2,088 Ha)	Aek Korsik Village, Aek Natas District, Labuhan Batu Regency, North Sumatra	2018	Certified in 2018
		Aek Kuo		2018	

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Name of Mill	Mill Address	Name of Supply Bases	Location / Address	Time Bound for Certification	Status
		(501 Ha)			
Negri Lama, I Mill – PT Hari Sawit Jaya	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	*3rd party which is excluded from scope of certification	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	2015	<ul style="list-style-type: none"> • Certified on 8 April 2015 • Audit in 2016 as Independent Mill • Re-certified in 2020

3.3 Details of Nonconformities

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

During this Assessment there were two (2) Critical; three (3) of Minor nonconformities and Zero (0) of OFI Opportunity For Improvement raised. The PT Indo Sepadan Jaya – Tanjung Selamat 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 (not applicable for RSPO ISH standard/audit). The implementation of the Corrective Actions for the Critical Nonconformity(ies) has been verified for its effectiveness and closed accordingly. The below is the summary of the non-conformity raised during this assessment.

Non-conformity						
NCR Ref #	2493686-202405-M1		Issued Date		10/05/2024	
Due Date	09/08/2024		Closure Date		17/07/2024	
Indicator & Category (Critical / Minor)	2.1.1 - Critical					
Statement of Nonconformity:	Based on the document review, it was found that there were discrepancies with employment regulations PP No. 35 tahun 2021 pasal 10 ayat 4					
Requirement Reference:	(C) The unit of certification complies to relevant regulations.					
Objective Evidence:	Based on document review, it was found that there are casual daily workers who work for 21 days or more for 3 consecutive months and up to now the work relationship is still casual daily, for example :					
	No	Employee ID	Working Day			
			January	February	March	April
	1	01672	21	21	22	19
	2	02254	26	22	24	20
	3	04000	22	24	21	17
	4	04372	22	21	24	24
	5	00595	26	22	24	19
*Based on payslip						
PP 35 of 2021 article 10 point 4:						
In the event that the Worker/Labourer works 21 (twenty one) days or more for 3 (three) consecutive months or more, the daily Work Agreement as referred to in paragraph (21) becomes invalid and the Employment Relationship between the Employer and the Worker/Labourer is legally enforceable. changes based on PKWTT.						
Corrections:	Appoint 5 workers as permanent workers who have worked for 21 consecutive days for 3 months.					

Root Cause Analysis:	<ol style="list-style-type: none"> 1. There is no PIC who is responsible for the employee appointment program at Pangkatan Estate because appointments are monitored systemically by the RO Office. 2. There has not been a quarterly review mechanism.
Corrective Actions:	<ol style="list-style-type: none"> 1. Appoint KTU (Head of Administration) as the PIC responsible for monitoring the employee recruitment program. 2. Make a memorandum to the PIC of the Appointment Program to provide justification if realization is not achieved according to the program. 3. Make monitoring every 3 months regarding the implementation of the appointment program for Estate & Mill. 4. Recruitment of new employees (core work) uses the PKWTT template and is evaluated every 6 months.
Assessment Conclusion:	<p>During NCR close out visit, there is evidence related to the appointment as permanent workers for 5 workers as stated, verified documents as follows:</p> <ol style="list-style-type: none"> 1. Memorandum No. 665/HR-RO1/MEMO/6/2024 dated 24 June 2024 regarding appointment of employees as SKU-H (permanent worker) for ID 00595 as Security in Pangkatan Estate. 2. Memorandum No. 669/HR-RO1/MEMO/6/2024 dated 24 June 2024 regarding appointment of employees as SKU-H (permanent worker) for ID 04372 as harvester in Pangkatan Estate. 3. Memorandum No. 667/HR-RO1/MEMO/6/2024 dated 24 June 2024 regarding appointment of employees as SKU-H (permanent worker) for ID 01672 as harvester in Pangkatan Estate. 4. Memorandum No. 659/HR-RO1/MEMO/6/2024 dated 24 June 2024 regarding appointment of employees as SKU-H (permanent worker) for ID 02254 as harvester in Pangkatan Estate. 5. Memorandum No. 668/HR-RO1/MEMO/6/2024 dated 24 June 2024 regarding appointment of employees as SKU-H (permanent worker) for ID 04000 as harvester in Pangkatan Estate. <p>There is evidence of appointment letter of KTU (Head of Administration) from Manager PT Rantau Sinar Karsa as PIC to monitor the employee recruitment program, verified documents namely Memorandum No. 020/EST-KPT/MEMO/II/24 dated 6 May 2024.</p> <p>Organization also has shown the document of recruitment of new employees (core work) uses the PKWTT template (permanent agreement template) for recruit the new workers, and it is evaluated every 6 months.</p> <p>During NCR close out visit, it was carried out interview to the KTU (head of administration) revealed that the KTU has known related to the memorandum No. 020 regarding the function to monitor the employee recruitment program and the new recruitment template. Interview were also has been carried out to the workers who ha been appointed by the organization, they said that they had received appointment letters, and they were aware of their new status as permanent workers (SKUH).</p> <p>Based on the CAP verification result during NCR close out visit that conducted onsite can be concluded that CAP for non conformance No. 2493686-202405-M1</p>

	has been implemented and that nonconformance has been closed satisfactorily on 17/07/2024.
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Non-conformity			
NCR Ref #	2493686-202405-M2	Issued Date	10 May 2024
Due Date	09 Aug 2024	Closure Date	17 July 2024
Indicator & Category (Critical / Minor)	6.2.4 - Critical		
Statement of Nonconformity:	<ol style="list-style-type: none"> 1. The company has not been able to show sufficient evidence that it has provided an adequate housing environment and sanitation facilities in accordance with national standards or higher. 2. The company has not been able to show sufficient evidence that it has protected water sources for employees from potential pollution. 		
Requirement Reference:	(C) The unit of certification provides adequate housing. Sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.		
Objective Evidence:	<p>Based on the results of field visits to employee housing, several things were found as follows:</p> <ul style="list-style-type: none"> • Solid domestic waste whose management is not yet optimal, such as disposal at the back of the house, ditches, or other areas even though the company has provided temporary shelter (KTS, KPT, PTS) • Landfill distance < 1 Km and there is solid domestic waste disposed of in the water well employee home area (PTS) • Drainage conditions that have not been managed properly so there are air reservoirs (KTS, KPT, PTS) • There is a broken waste disposal pipe so that household waste water flood in the area behind the house (KPT & PTS) <p>Permenkes No. 2 of 2023 concerning Government Implementing Regulations PP No 66 of 2014 concerning Environmental Health, which explains:</p> <ul style="list-style-type: none"> • Health requirements for water as intended in paragraph (1) consist of: <ul style="list-style-type: none"> - The water is protected from sources of pollution, disease-carrying animals and vector development areas. - safe from possible contamination. • Efforts to protect Public Health are carried out to create a healthy environment that is free from elements that cause health problems in the form of waste that is not managed in accordance with requirements. <p>Furthermore, PP 81 of 2012 states that the distance of the landfill from emplacement is at least 1 km.</p>		

Corrections:	<ol style="list-style-type: none"> 1. Carry out mutual cooperation "gotong royong" to clean up domestic waste behind the house, ditch and yard. 2. Transport domestic waste from the landfill which is <1 km from housing and domestic waste in the well area and then close the landfill so that it is not reused. 3. Repair damaged domestic wastewater pipes.
Root Cause Analysis:	There is no implementation of the mutual cooperation program "gotong royong" in employee housing which is usually carried out once a week on a regular basis.
Corrective Actions:	<ol style="list-style-type: none"> 1. Make a memorandum to employees regarding the prohibition of dumping domestic waste behind houses, ditches, in yards and must dispose of it in the temporary waste collection boxes that have been provided. 2. Conduct direct socialization to employees regarding domestic waste management and add signboards related to domestic waste management as a means of indirect socialization. 3. Appoint KTU as PIC responsible for the cleanliness of the employee housing environment.
Assessment Conclusion:	<p>During NCR close out visit, auditor has carried out verification of document as follows:</p> <ul style="list-style-type: none"> • Note of activity "Berita Acara Kegiatan Jum'at Bersih" housing cleaning activities at Pangkatan Estate on 24 June 2024, notulent has explained related to the housing cleaning activities at hosuing of Pangkatan Estate. • Note of activity "Berita Acara Kegiatan Jum'at Bersih" housing cleaning activities at Pangkatan Estate on 24 June 2024, notulent has explained related to the housing cleaning activities at hosuing of Tanjung Selamat Estate. • Note of activity "Berita Acara Kegiatan Jum'at Bersih" housing cleaning activities at Pangkatan Estate on 24 June 2024, notulent has explained related to the housing cleaning activities at hosuing of Tanjung Selamat POM. <p>The activity is also to repair the damaged domestic waste water drainage pipe at housing</p> <p>The organization has established memorandum related to appointment of PIC to monitor of domestical waste handling in employee housing. The memo that has been verified as follows:</p> <p>Memorandum from Estate Manager – Pangkatan Estate No. 029/EST-KPT/MEMO/V/24 dated 20 May 2024 related to the policy for cleanliness and healthy environment "Kebijakan untuk kebersihan dan lingkungan yang sehat". The memo also has explained related to the punishment for workers that who do not follow the prosedur of domestical waste handling.</p> <p>Memorandum from Estate Manager – Tanjung Selamat Estate No. 131/EST-KTS/MEMO/V/24 dated 20 May 2024 related to the policy for cleanliness and healthy environment "Kebijakan untuk kebersihan dan lingkungan yang sehat". The memo also has explained related to the punishment for workers that who do not follow the prosedur of domestical waste handling.</p> <p>Memorandum from Estate Manager – Tanjung Selamat POM No. 087/EST-KTS/MEMO/V/24 dated 20 May 2024 related to the policy for cleanliness and healthy environment "Kebijakan untuk kebersihan dan lingkungan yang sehat". The memo also has explained related to the punishment for workers that who do not follow the prosedur of domestical waste handling.</p>

	<p>Organization has carried out socialization related to the handling of domestical waste and adding simbol related to domestic waste management as a means of indirect socilaization, verified document as follows: Pangkatan Estate on 15/05/2024, Tanjung Selamat Estate on 15/05/2024 and Tanjung Selamat POM on 17/05/2024.</p> <p>During NCR close out visit, auditor has carried out field verifications to the employee housing at Pangkatan Estate and Tanjung Selamat Estate/POM, based on the field verification revealed that the employee housing especially for domestical waste, water pipes and housing cleanliness are maintained. Also seen the signboard related to the handling of domestical waste.</p> <p>Based on the CAP verification result during NCR close out visit that conducted onsite can be concluded that CAP for non conformance No. 2493686-202405-M2 has been implemented and that nonconformance has been closed satisfactorily on 17/07/2024.</p>
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Non-conformity			
NCR Ref #	2493686-202405-N1	Issued Date	10 May 2024
Due Date	ASA.1.4	Closure Date	ASA.1.4
Indicator & Category (Critical / Minor)	3.3.2 Minor		
Statement of Nonconformity:	Company has established a mechanism to check consistent implementations of procedures, however still found inconsistencies.		
Requirement Reference:	A mechanism to check consistent implementation of procedures is in place.		
Objective Evidence:	The Company already has SOP AA-KL-04-EFP rev 1 dated 1 December 2009 Penggunaan Agrochemical poin 6.3 and 6.4 and SOP AA-APM-OP-1100.09-R8 Pemupukan dated 1 June 2020 which states that after work, PPE will be rinsed and stored in a locker, however, based on field interviews with spray workers at Blocks C14m Afd III Tanjung Selamat Estate and B18j Afd II Pangkatan Estate, they were informed that after rinsing, PPE was stored at home.		
Corrections:	The fertilizer supervisor carries out a checklist for returning PPE to the locker after fertilization is complete by ensuring that the PPE is rinsed in the PPE washing room.		
Root Cause Analysis:	Socialization to fertilizer workers regarding the prohibition on bringing PPE to home has not been carried out routinely, so there are employees who forget, and there is a lack of monitoring from the supervisor.		
Corrective Actions:	Conduct routine socialization to employees once a week regarding the prohibition on bringing PPE to home.		
Assessment Conclusion:	The effectiveness of the CAP will be verified during the next surveillance audit.		

Non-conformity			
NCR Ref #	2493686-202405-N2	Issued Date	10 May 2024
Due Date	Next Surveillance	Closure Date	Open

Indicator & Category (Critical / Minor)	7.3.2 Minor
Statement of Nonconformity:	Based on field visit, the auditor found that the certificate holder has not consistence on disposal of waste material according to procedures.
Requirement Reference:	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.
Objective Evidence:	PT Indo Sepadan Jaya dan PT Rantau Sinar Karsa prepared a procedure to handle hazardous waste titled "Prosedur Penanganan Limbah B3" No. AA-KL-06-EFP explains methods to collecting the waste, recording in balance and disposal through licensed third-party transporter. However, based on field visit, the auditor found that the certificate holder has not consistence on disposal of hazardous waste material according to procedures. Evidence: In emplacement areas both at POM & Estate found the use of used chemical packaging for water storage: including blue chem, Pertamina drums, ex-pesticide packaging
Corrections:	1. Move chemical packaging to hazardous waste storage (TPS LB3). 2. Write a warning letter to employees who use chemical packaging for water storage.
Root Cause Analysis:	There are still some employees who do not understand the handling of used chemical containers as B3 waste which cannot be used again and must be handed over to hazardous waste storage (TPS LB3).
Corrective Actions:	1. Conduct socialization to employees regarding the prohibition on the use of chemical packaging for water storage. 2. Carry out routine inspections every 2 months at the employee housing. 3. Conduct socialization warehouse employees regarding the prohibition on giving away used chemical containers. 4. Conduct inspections every 2 months of chemical containers stored in the warehouse compared to chemical containers submitted at hazardous waste storage (TPS LB3). 5. Prepare a letter appointing a PIC to check hazardous waste storage (TPS LB3).
Assessment Conclusion:	The effectiveness of the CAP will be verified during the next surveillance audit.

Non-conformity			
NCR Ref #	2493686-202405-N3	Issued Date	10 May 2024
Due Date	Next Surveillance	Closure Date	Open
Indicator & Category (Critical / Minor)	7.3.3 Minor		
Statement of Nonconformity:	Based on field visit, there was found the use open fire for waste disposal.		
Requirement Reference:	The unit of certification does not use open fire for waste disposal.		
Objective Evidence:	Based on field visit, there was found the use open fire for waste disposal.		

	Evidence: In emplacement in Pangkatan Estate, there was found the use open fire for waste disposal (the fire is still burning).
Corrections:	Make a warning letter to employees who burn/use fire to dispose of rubbish.
Root Cause Analysis:	<ol style="list-style-type: none"> 1. Lack of employee knowledge of the negative impact on the environment if burning domestic waste. 2. Lack of installation of billboards prohibiting burning of waste in housing.
Corrective Actions:	<ol style="list-style-type: none"> 1. Conduct sosialisasi to employees regarding the negative impacts of destroying waste by burning & prohibiting burning of domestical waste. 2. Carry out an inventory of billboard installation needs and install them. 3. Make a schedule for transporting domestical waste from employee housing.
Assessment Conclusion:	The effectiveness of the CAP will be verified during the next surveillance audit.

Opportunity for Improvements	
OFI #	Description
OFI 1	-

Positive Findings	
PF #	Description
PF 1	-

3.3.1 Status of Nonconformities Previously Identified and Opportunity for Improvement

Previous Audit Critical (Major) Non-conformity			
NCR Ref #	2358185-202305-M1	Issued Date	25/05/2023
Due Date	25/08/2023	Closure Date	11/08/2023
Indicator & Category (Critical / Minor)	3.6.1 Critical		
Statement of Nonconformity:	There is no risk analysis has been carried out by company against the maintenance and construction of Mill support facilities conducted by the contractor.		
Requirement Reference:	(C) All operational activities risks assessed to identify the H&S issues. Mitigation plans and procedures are documented and implemented.		
Objective Evidence:	During field audit to Tanjung Selamat POM it was notice that there is a maintenance and construction activity conducted by contractor, however there is no risk analysis conducted by company for those activities.		
Corrections:	<ul style="list-style-type: none"> - Conducted the review and identify the risk analysis for activity of incinerator construction by contractor and updated the HIRADC document. - Socialize the HIRADC for contractor activity of (incinerator construction). 		

Root Cause Analysis:	OHS expert were miss to review and adjustment the latest risk analysis related to contractor work at Tanjung Selamat POM.
Corrective Actions:	Conduct regular review and monitoring the new activity in Mill and Estate particularly for contractor activity.
Assessment Conclusion:	<ul style="list-style-type: none"> - PT Indo Sepadan Jaya – Tanjung Selamat POM has identified the activity of contractor covering construction of incinerator. Risk analysis and risk control or mitigation has been determined. HIRADC has been review and updated on 7 July 2023 through safety committee meeting. Evidence of HIRADC document and review are available during audit. - PT Indo Sepadan Jaya – Tanjung Selamat POM has conducted the socialization to the contractor and it workers related to HIRADC for incinerator construction. Socialization conducted through master morning by Field Assistant and Mill manager. During interview with contractor supervisor PT Ayam Mas (Ardiansyah) and its workers on 11 August 2023, confirmed that they have aware related to the risk of their activity and how to mitigate the risk, such as PPE usage during working and implementing safe working practices to prevent the incident/accident. - Monitoring and review for HIRADC and its implementation will be conducted through safety committee meeting. Latest meeting conducted on 7 July 2023. Safety committee meeting will be conducted monthly and reported each quarter on P2K3 report to Manpower Office of North Sumatera Province. <p>Based on above verification, the CAP has effectively implemented and the NC has been Closed satisfactory.</p>
Effectiveness Closure (for previous audit closed Critical NC):	During ASA1.3 audit, there is no issue related to this indicator. The company has carried out updated for HIRADC on 12 January 2024, based on document review revealed that all activity in estates and mill has updated. The corrective action has been implemented consistently.

Previous Audit Critical (Major) Non-conformity			
NCR Ref #	2358185-202305-M2	Issued Date	25/05/2023
Due Date	25/08/2023	Closure Date	11/08/2023
Indicator & Category (Critical / Minor)	6.2.2 Critical		
Statement of Nonconformity:	During audit, it was found the workers were doing work without a work contract with the company.		
Requirement Reference:	(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed.		
Objective Evidence:	Based on interviews result with employees at Tanjung Selamat Estate in harvesting activity at Block A17k Afd I with a sample of employees (Initial IN, JN, RI) and B15i-Afd II with a sample of employees (Initial FM), it was found that there were		

	workers who assisted in harvesting activities (taking loose fruit) who were not registered as workers and did not have work contracts with the company.
Corrections:	<ul style="list-style-type: none"> - Conduct socialization to harvesters regarding the prohibition on bringing workers without work contracts involving representatives of the Estate Dept, HR Department, Safety Team and Company Doctors so that harvesters understand the risk/impacts and consequences if a work accident occurs to the non-workers brought. - Conduct socialization to housewives (Wives) regarding the prohibition on being in the work area for non-workers not to be in the work area during working hours, usually the wives are often willing to help so that they know the strict sanctions that will be given if they violate it.
Root Cause Analysis:	<p>Lack of awareness and understanding from harvesters and non-workers (relatives/wives) regarding the risk of work safety for non-contract workers or non-workers,</p> <p>As well as minimal knowledge and understanding and firm action towards supervision regarding the company policy which prohibits the use of voluntary harvest helpers from non-workers, due to the absence of special inspections from supervision so that non-workers still secretly carry out these actions to increase harvest income.</p>
Corrective Actions:	<ul style="list-style-type: none"> - Supervision carries out monitoring and supervision to ensure that there are no harvest work assistants in the field who help the harvesters' work without a work contract. - Issued a policy (Memo) of strict sanctions for harvest workers caught bringing non-workers from management regarding the prohibition on bringing workers without a work contract.
Assessment Conclusion:	<ul style="list-style-type: none"> - PT Indo Sepadan Jaya has conducted socialization to harvesters regarding the prohibition on bringing workers without work contracts, socialization conducted on 8 June 2023 in Kebun Pangkatan – Rantau Sinar Karsa and Tanjung Selamat Estate. Socialization also conducted to housewives (Wives) regarding the prohibition on being in the work area for non-workers not to be in the work area during working hours. During interview with sampled workers and their wives confirmed that they have understanding that non workers are prohibited to conduct working/helping the harvester in the field to picked up loose fruit/frond stacking. Company only allowed the assign workers to help the harvester during peak season for picked up loose fruit. - PT Indo Sepadan Jaya has issued the memorandum of strict sanctions for harvest workers caught bringing non-workers from management regarding the prohibition on bringing workers without a work contract. The memorandum has socialize to the harvester and non workers on 8 June 2023. - PT Indo Sepadan Jaya has conduct the monitoring to ensure that there is no harvest work assistants in the field who help the harvesters' work without a work contract. Monitoring conducted by field supervisor before working and during working. Monitoring evidence was sighted in "Monitoring Pekerjaan Panen". Monitoring reported to Field Assistant and Estate manager. According to monitoring result August 2023, there is no helper or non workers who conduct working/helping harvester in the field. <p>Based on above verification, the CAP has effectively implemented and the NC has been Closed satisfactory.</p>

Effectiveness Closure (for previous audit closed Critical NC):	During ASA1.3 audit, there is no issue related to this indicator. Auditor has carried out interview to the workers during field visit at harvesting activity to the workers and supervisor, it was known that they were aware of the prohibition to carrying the worker without a contract. The corrective action has been implemented consistently.
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Previous Audit Critical (Major) Non-conformity			
NCR Ref #	2358185-202305-M3	Issued Date	25/05/2023
Due Date	25/08/2023	Closure Date	11/08/2023
Indicator & Category (Critical / Minor)	7.8.2 Critical		
Statement of Nonconformity:	Company has not implementing the water courses protection according to procedure and management plan.		
Requirement Reference:	(C) Water courses and wetlands are protected, including the maintenance and restoration of riparian zones and other buffer zones during or before replanting, in accordance with the "RSPO Manual on BMPs for the management and rehabilitation of riparian reserves" (April 2017) or Simplified Guide Management and Rehabilitation of Riparian Reserves (2018).		
Objective Evidence:	During a field visit to the Tanjung Selamat POM, it was found that there was leachate from the boiler ashes which flowed into the natural ditch and did not flow into the waste pond.		
Corrections:	Develop a permanent leachate flow barrier around the boiler ash pile leading to the waste ditch and waste pond.		
Root Cause Analysis:	There is no barrier to the flow of leachate around the boiler ash pile.		
Corrective Actions:	Monitoring the condition of liquid waste disposal ditches at each shift change.		
Assessment Conclusion:	<p>Tanjung Selamat POM has made the leachate flow barrier around the boiler ash pile. During field visit to Tanjung Selamat Mill it was found that there is no more leachate from the boiler ashes which flowed into the natural ditch. The leachate from boiler ash was flow in to the waste ditch and waste pond. Natural ditch condition currently no leachate from boiler ashes.</p> <p>Tanjung Selamat POM also has conducted daily monitoring by field assistant to ensure that there is no leachate of boiler ash in to the natural ditch and ensuring that the permanent leachate flow barrier are well maintained.</p> <p>Based on above verification, the CAP has effectively implemented and the NC has been Closed satisfactory.</p>		
Effectiveness Closure (for previous audit closed Critical NC):	During ASA1.3 audit, there is no issue related to this indicator. During field visit to the Mill it was known that there is no leachate from the boiler ashes which flowed into the natural ditch. Housekeeping at the mill looks better. The corrective action has been implemented consistently.		

Previous Audit Opportunity for Improvement

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OFI#	Description
OFI 1	OFI Statement: - Verification / Follow-up actions: - <i>Note: There is no OFI from previous assessment.</i>

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
2049985-202101-M1	Critical	3.6.2	27/02/2021	Closed on 5 May 2021
2049985-202101-N1	Minor	7.3.1	27/02/2021	Escalated to Major NC
2049985-202101-N2	Minor	6.2.7	27/02/2021	Closed on 20 April 2022
2049985-202101-N3	Minor	2.1.3	27/02/2021	Escalated to Major NC
2190654-202204-M1	Critical	2.1.3	21/04/2022	Closed on 18 June 2022
2190654-202204-M2	Critical	7.3.1	21/04/2022	Closed on 18 June 2022
2190654-202204-N1	Minor	2.3.2	21/04/2022	Closed on 25/05/2023
2190654-202204-N2	Minor	6.7.2	21/04/2022	Closed on 25/05/2023
2358185-202305-M1	Critical	3.6.1	25/05/2023	Closed on 11/08/2023
2358185-202305-M1	Critical	6.2.2	25/05/2023	Closed on 11/08/2023
2358185-202305-M1	Critical	7.8.2	25/05/2023	Closed on 11/08/2023
2493686-202405-M1	Critical	2.1.1	10/05/2024	Closed on 17/07/2024
2493686-202405-M2	Critical	6.2.4	10/05/2024	Closed on 17/07/2024
2493686-202405-N1	Minor	3.3.2	10/05/2024	Open
2493686-202405-N2	Minor	7.3.2	10/05/2024	Open
2493686-202405-N3	Minor	7.3.3	10/05/2024	Open

3.4 Stakeholders and previous land owner / user consultation

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss **PT Indo Sepadan Jaya – Tanjung Selamat Mill** 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. 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.

Stakeholders contacted		
Type of Stakeholder (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	Stakeholder name / organization	Means of communication (e.g. face to face interview, email, phone interview, comment from public notice)
Governmental Department	<ul style="list-style-type: none"> Dinas Tenaga Kerja Kabupaten Labuhan Batu/Man Power Office of Labuhan Batu Regency. Dinas Perkebunan Kabupaten Labuhan Batu – Agriculture Office of Labuhan Batu Regency DLH kabupaten Labuhan Batu – Environment Office of Labuhan Batu Land Office of Labuhan Batu Regency 	Phone interview
Communities	<ul style="list-style-type: none"> Head of Tanjung Selamat Village Head of Senah Selamat Village 	face to face interview
Internal, Union	<ul style="list-style-type: none"> Gender Committee Pangkatan Estate Workers Union Pangkatan Estate 	face to face interview

Stakeholders comment	
1#	<p>Feedbacks:</p> <p>Dinas Tenaga Kerja Kabupaten Labuhan Batu/Man Power Office of Labuhan Batu Regency Mrs Ernawati Siregar</p> <p>So far, the company has routinely submitted mandatory reporting such as <i>WLTK</i> and the use of <i>PKWT/BHL</i> workers. As far as the source person knows, until now there are still workers in the main job (harvesting and processing) whose status is <i>PKWT</i>. The source person said that although it is not allowed by the rules, looking at the field conditions and special situations, the use of <i>PKWT</i> can still be tolerated, the period that should be 3 months for probation is allowed up to 1 year.</p> <p>During the past year, there have been cases of industrial relations settlement, namely layoffs (already cleared) and the problem of appointing employees to permanent employees (still in process).</p> <p>Audit Team verification and response:</p> <p>Document verification known that company commit to promote daily worker into permanent worker as described in 3.5.2, 4.2.2, and 6.2.7. https://www.koranperdjoeangan.com/peselisihan-pekerja-dan-pt-rsk-temui-kesepakatan-ini-hasilnya/.</p>

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2#	<p>Feedbacks: Dinas Perkebunan Kabupaten Labuhan Batu – Agriculture Office of Labuhan Batu Regency Mr Yayan</p> <p>In general, the relationship and coordination with the office has been very good. The main issue that requires attention and positive progress is the partnership for PT ISJ and PT RSK.</p> <ul style="list-style-type: none"> • PT ISJ: Progress of partnership ratification through the Regent's Decree • PT RSK: Progress of partnership and establishment of the Institution <p>The company already has sufficient facilities and infrastructure for controlling land fires. In terms of peat management, the agriculture office has conducted field visits to check peatland that has not been cultivated, including peatland management.</p> <p>Audit Team verification and response: The company is committed to implementing input from Agricultural Agency and will continue to coordinate with the community and Agricultural Agency.</p> <p>Related to progress of partnership program of PT ISJ and PT RSK, organization has carried out a meeting to discuss the CSV partnership MOU on 6-8 June 2023 which was attended by Sennah village and farmers, coordination data on farmers' land has been collected according to the sample. The condition of FFB suppliers at the Tanjung Selamat Mill is currently fulfilled so that new FFB suppliers from Sennah village cannot be added.</p> <p>Currently, management is considering other alternative steps to solve the problem by continuing discussions with Sennah Village</p>
3#	<p>Feedbacks: DLH Kabupaten Labuhan Batu – Environment Office of Labuhan Batu</p> <p>The company carries out mandatory reporting in accordance with the timetable such as RKL - RPL, waste management, and reports on land fire infrastructure. During the past year there has been an issue regarding environmental pollution, namely the discharge of liquid palm oil waste into water bodies even though in the same river there are a total of 4 companies that discharge into the river</p> <p>Audit Team verification and response: Auditor has carried out field verification and document review, it was known that based on field verification the condition water bodies looks normal, based on document review of result of surface water analysis, the environment quality standards has meet with regulation.</p>
4#	<p>Feedbacks: Land Agency of Labuhan Batu Regency</p> <p>Auditor team has sent the letter of stakeholders consultations, however could not be contacted during audit.</p> <p>Audit Team verification and response: -</p>
5#	<p>Feedbacks: Head of Tanjung Selamat Village</p> <p>Currently, the resource person has been serving as Acting Village Head for 6 months, so the information provided is within the last 6 months. So far, the relationship with the village is said to be quite good. CSR</p>

	has been realized to the community and requests for assistance proposals have been responded to promptly.
	Audit Team verification and response: No negative issue need further verification
6#	Feedbacks: Head of Senah Selamat Village Mr. Horas Lumbangaol Until now, the relationship and coordination with the community is considered quite good but still needs to be improved, especially the partnership with PT RSK for good plantation management. The community has sent a letter for a request for guidance on farmer's plantations and has not received further information. Audit Team verification and response: The company is committed to implementing input from Senah Village and will continue to coordinate with the community and Head of Senah Village. Related to the letter for requesting a guidance on farmer's plantations, organizationa has responded to this by conducting FGDs related to good management practises in the surrounding community. The progress are: Organization has carried out a meeting to discuss the CSV partnership MOU on 6-8 June 2023 which was attended by Sennah village and farmers, coordination data on farmers' land has been collected according to the sample. The condition of FFB suppliers at the Tanjung Selamat Mill is currently fulfilled so that new FFB suppliers from Sennah village cannot be added. Currently, management is considering other alternative steps to solve the problem by continuing discussions with Sennah Village.
7#	Feedbacks: Gender Committee Pangkatan Estate Chairman The company supports the activities of the gender committee and provides guidance to the management. The priority of the gender committee's activities at this time is the development of women's capacity to be more independent and aware of the protection of their rights. In the past year there have been no incidents of harassment or violence against either male or female employees. The company has also conducted an assessment of the needs of young mothers with the results of providing integrated health post facilities and pregnancy/postpartum consultations with midwives or nurses. Audit Team verification and response: No negative issue need further verification
8#	Feedbacks: Workers Union Pangkatan Estate Chairman So far, the relationship and coordination have been going well. In the past year, the main issue has been the promotion of daily employees to permanent employees Audit Team verification and response:

	No negative issue need further verification. Promotion of contract worker has been described in 3.5.2 and 6.2.7
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List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
Nil	-	-	-	-	-
Notes: PT Indo Sepadan Jaya, Tanjung Selamat Mill, Tanjung Selamat Estate and PT Rantau Sinar karsa – Pangkatan Estate has established since 1985 and has planting palm oil since 1984. Currently the palm oil has been replanted since 2012 – 2020.					

Previous land owner / user comment	
	Feedbacks: Nil
	Audit Team verification and response: Nil

3.5 Impartiality and conflict of interest

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

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Formal Signing-off of Assessment Conclusion and Recommendation

The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that **PT Indo Sepadan Jaya- Tanjung Selamat Mill** has complied with the Indonesia National Interpretation 2020 of the RSPO P&C 2018 and audit criteria identified within the audit report. It is deemed that the management system has achieved its intended outcomes. Therefore, it is recommended that **PT Indo Sepadan Jaya- Tanjung Selamat Mill** is remain certified.

Report prepared by	Acceptance of Assessment Conclusion
Name: Nanang Rusmana	Name: Putu Ghryate Yonata Aksa
Company Name: On behalf of BSI Services Malaysia Sdn.Bhd.	Company Name: PT Indo Sepadan Jaya – Tanjung Selamat Palm Oil Mill
Title: Lead Auditor	Title: Sustainability Manager
Signature: 	Signature: <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i> 
Date: 05/08/2024	Date: 05/08/2024

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Appendix A: Summary of Findings

Criterion / Indicator		Assessment Findings	Compliance
Principle 1: Behave ethically and transparently Drive ethical business behaviour, build trust and transparency with stakeholders to ensure strong and healthy relationships.			
Criteria 1.1: The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	(C) Management documents that are specified in the RSPO P&C are made publicly available. - Critical (Major) compliance -	The company has "Daftar Informasi Untuk Diakses Publik" which established in January 2024. List of information can be accessed by public i.e : Legalities: <ul style="list-style-type: none"> Land titles/user rights (<i>Izin Lokasi, Izin Prinsip, IPKH, Sertifikat HGU, HGB and IMB</i>) Employment, safety and health: <ul style="list-style-type: none"> Occupational health and safety plans and reports (<i>Laporan Pelaksanaan P2K3</i>) Compulsory employment report every year. Environmental: <ul style="list-style-type: none"> Plans and impact assessments relating to environmental and social impacts (AMDAL, Environmental licensing and Environmental Management Program) HCV & HCS documentation (Conservation Management Plan, HCV Pollution prevention and reduction plans (Environmental Management Social and Human Right: <ul style="list-style-type: none"> Report, Social Impact Assessment and HCV Identification Report) 	Complied

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		<ul style="list-style-type: none"> • Program, Hazardous waste Report, Land Application Report and also Report of physical and chemical analysis of river water) • Details of complaints and grievances (Procedure of Information handling, Procedure of "keluhan konflik lahan" and records of and recording of deliberation process and compensation). • Negotiation procedures (Recording of deliberation process and compensation) • Continuous improvement plans (Continuous Improvement Program) • CSR programs and realization • Human Rights Policy (including in the Company Policy update on 1 December 2019 and has been dissemination to all operation at workplace on 8 July 2023, 7 October 2023 and 23 October 2023) • FFB price information for FFB suppliers • Forest service report (<i>Karhutla: Kebakaran Hutan dan Lahan</i>) <p>Interview result with representative of Sennah Village and Tanjung Selamat Village known that they aware how to access the information if needed.</p>	
1.1.2	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>Interviews result with relevant stakeholders such as agency representatives, village representatives and employee representatives, it is known that information is available in Bahasa and can be accessed by making an information request. Documents are in accordance with the list of documents that can be accessed by the public. Some are available at the main office in the form of original documents or copies. If the documents are not yet available at the plantation office, the flow of providing documents follows the information request procedure.</p> <p>Some information that is routinely provided to stakeholders includes:</p> <ul style="list-style-type: none"> • Mandatory Employment Report every year. • Plantation Business Development Report every 6 months. 	Complied

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		<ul style="list-style-type: none"> OHS Committee report every 3 months. Annual Land Use Title utilization report And others 	
1.1.3	<p>(C) Records of requests for information and responses are maintained.</p> <p>- Critical (Major) compliance -</p>	<p>The company has a logbook of incoming and outgoing letters as a way to monitor whether or not there are incoming information requests, the response time period, and the status of the information request. In the last one-year period, there were no requests for information, more requests for assistance such as road repairs, heavy equipment assistance, and public facility assistance. This is explained in more detail in indicator 4.3.1.</p> <p>The results of interviews with representatives of Sannah Village and Tanjung Salamat Village showed that so far responses have always been given immediately, for example via WhatsApp for initial responses. While the official response will be followed by an official response letter from the company. Interviewee also stated that this procedure has been communicated periodically to relevant stakeholder</p>	Complied
1.1.4	<p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official.</p> <p>- Critical (Major) compliance -</p>	<p>Company has SOP No AAGL-5008.1-R1: Handling Information Requests which described mechanism of consultation and communication. In this procedure, the time frame for responding to information requests has been regulated, including the PIC who will handle the information request. Company shows appointment letter No 103/HR/R01/EXT/04/2023 related public relation for PT ISJ and PT RSK. Company has carried out socialization to all relevant stakeholders on 7, 8, 23 October 2023.</p>	Complied
1.1.5	<p>An up-to-date list of contacts and detailed stakeholder information is available along with designated representatives.</p> <p>- Minor compliance -</p>	<p>Company shows list stakeholder for year 2024 which inform address, name of contact person, phone number, position, and title. Stakeholder divided into several type i.e.:</p> <ul style="list-style-type: none"> Non-Government Organization for example Sawit Watch dan Greenpeace. 	Complied

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		<ul style="list-style-type: none"> - Village for example: Sennah & Tanjung Selamat - Government: Environmental Agency, Labour Agency, Plantation Agency, National Land Agency - Internal: Gender committee & Worker Union <p>Interview result with stakeholder representative known that company has updating list stakeholder once a year.</p>	
Criteria 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	<p>A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.</p> <p>- Minor compliance -</p>	<p>There is no change related policy for ethical conduct. Company policy is established on December 01, 2019, related Human Rights and Ethical Behaviour. This policy has described company commitment related anti has included regulations on anti-bribery, prohibition on corruption and fair behaviour. Interview result with worker union and stakeholder representative known that its policy has been socialized and implemented. In the employee selection process business ethic behaviour is applied. Otherwise in collective labour agreement period 2022 – 2024 in article 16 also described this policy specifically related business ethical behaviour. For recruitment and contracts, during ASA1.3 auditor has verified contract document for new workers, for example Contract Agreement No 003/PKHL/KTS/03/2024 dated 19 March 2024 between PT ISJ and Cha*d*a W*b**o as upkeep worker at Tanjung Selamat Estate, Contract Agreement No 004/PKHL/KTS/03/2024 dated 19 March 2024 between PT ISJ and Ah**d Ri**i as upkeep worker at Tanjung Selamat Estate, and Contract Agreement No 005/PKHL/KTS/03/2024 dated 19 March 2024 between PT ISJ and H***r* Kel*** De***t* as upkeep worker at Tanjung Selamat Estate.</p>	Complied
1.2.2	<p>A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.</p> <p>- Minor compliance -</p>	<p>The company carries out periodic socialization to every employee or contractor regarding the ethical conduct policy. Monitoring of the</p>	Complied

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		<p>implementation of the policy is carried out through several things, including.</p> <ul style="list-style-type: none"> • Included in the collective work agreement. • Listed in the employee work agreement. • Listed in the work agreement letter. • Monitoring through internal sustainability audits conducted annually 	
Principle 2: Operate legally and respect rights Implement legal requirements as the basic principles of operation in any jurisdiction.			
Criteria 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	(C) The unit of certification complies to relevant regulations. - Critical (Major) compliance -	<p>Company can demonstrate compliance with relevant regulations for example:</p> <p>Legality Aspect Has HGU with an area of 8,338.645 Ha as explained in more detail in indicator 4.4.1</p> <p>Best Management Practice Has used registered pesticides with valid distribution permits.</p> <p>Environmental Aspect Has had an environmental permit which detail described in 3.4.1</p> <p>Employment Aspect Based on document review, it was found that there are casual daily workers who work for 21 days or more for 3 consecutive months and up to now the work relationship is still casual daily, for example :</p>	Non-compliance

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		<table><tr><th rowspan="2">No</th><th rowspan="2">Employee ID</th><th colspan="4">Working Day</th></tr><tr><th>January</th><th>February</th><th>March</th><th>April</th></tr><tr><td>1</td><td>01672</td><td>21</td><td>21</td><td>22</td><td>19</td></tr><tr><td>2</td><td>02254</td><td>26</td><td>22</td><td>24</td><td>20</td></tr><tr><td>3</td><td>04000</td><td>22</td><td>24</td><td>21</td><td>17</td></tr><tr><td>4</td><td>04372</td><td>22</td><td>21</td><td>24</td><td>24</td></tr><tr><td>5</td><td>00595</td><td>26</td><td>22</td><td>24</td><td>19</td></tr></table> <p>*Based on payslip</p> <p>PP 35 of 2021 article 10 point 4:</p> <p>In the event that the Worker/Labourer works 21 (twenty one) days or more for 3 (three) consecutive months or more, the daily Work Agreement as referred to in paragraph (21) becomes invalid and the Employment Relationship between the Employer and the Worker/Labourer is legally enforceable. changes based on <i>PKWTT</i>.</p> <p>Nonconformity:</p> <p>The company has not been able to show sufficient evidence that its employment procedures have been implemented consistently in accordance with PP 35 of 2021</p>	No	Employee ID	Working Day				January	February	March	April	1	01672	21	21	22	19	2	02254	26	22	24	20	3	04000	22	24	21	17	4	04372	22	21	24	24	5	00595	26	22	24	19	
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3	04000	22	24	21	17																																						
4	04372	22	21	24	24																																						
5	00595	26	22	24	19																																						
2.1.2	A documented system for ensuring legal compliance is in place. This system has means to track changes to the law and also includes listing and evidence on evaluation of legal compliance of all contracted third parties, such as: recruitment agencies, service provider and labour contractor.	To ensure the laws and legal compliance, the Unit of Certification has a mechanism to assess the compliance toward the laws and regulations. Implementation started with inventorying and making a list of the rules applicable in regional, national, and international by D&L Public Relation annually. Some regulatory updates eg: <ul style="list-style-type: none">Government decree number 37-year 2021 related job loss security	Complied																																								

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	- Minor compliance -	<ul style="list-style-type: none"> Regulation of the Minister of Manpower (Permenaker) 4/2022 Regarding Procedures and Requirements for Payment of Old Age Security Benefits The district head regulation regarding the district minimum wage in 2023 Minister of Health Regulation No. 2 of 2023 regarding Environmental Health Standard <p>Evaluation of regulatory compliance has been carried out by the company for each relevant legal regulation. The company also conveys the obligation to fulfill the relevant regulations to the contractors</p>	
2.1.3	<p>Legal or authorized boundaries are clearly demarcated and visibly maintained and there is no planting beyond these legal or authorized boundaries.</p> <p>- Minor compliance -</p>	The company has a mechanism to monitor and maintain land title/ <i>HGU</i> pole which is carried out every year. The results of field visits to land title/ <i>HGU</i> pole show that the condition is good according to the results of the last monitoring and supervision. During ASA1.3 has carried out field verification for land title poles as follows Pole No. LXV at Block A193, Pole No. LXIV at Block A19a, based on field verification revealed that the poles are available, well maintained and have identification numbers.	Complied
Criteria 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.			
2.2.1	<p>A list of contracted parties is available.</p> <p>- Minor compliance -</p>	Based on document review during ASA1.3, organization has a list of contracts, and it is well maintained in the format of "Monitoring of List of Contractor period 2023/2024", there are 4 contractors in estates and 2 contractors for Mill including FFB suppliers. Monitoring is carried out to monitor the type of work, job period, job progress as well as BAP status/payment of contract.	Complied
2.2.2	All contract, including those for FFB supply, contain specific clause on meeting relevant legal requirements and this can be demonstrated by the third party.	Based on document review during ASA1.3, organization has a list of contracts, and it is well maintained in the format of "Monitoring of List of Contractor period 2023/2024", there are 4 contractors in estates and	Complied

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	- Minor compliance -	<p>2 contractors for Mill including FFB suppliers. Monitoring is carried out to monitor the type of work, job period, job progress as well as BAP status/payment of contract.</p> <p>Contract document verified for example:</p> <ul style="list-style-type: none"> • Agreement Letter No. 001/TBS/ISJ/2023 dated 1 May 2023 – FFB Supplier, between PT Indo Sepadan Jaya and Aisyah (FFB Supplier). • Agreement Letter No. 001/TBS/ISJ/2022 dated 1 May 2022 – FFB Supplier, between PT Indo Sepadan Jaya and IWH - Iwan Haryono (FFB Supplier). • Agreement Letter No. 001/TBS/ISJ/2023 dated 1 May 2023 – FFB Supplier, between PT Indo Sepadan Jaya and MBS – Marlon Brando Sibarani (FFB Supplier). • Agreement Letter No. 001/TBS/ISJ/2020 dated 1 May 2023 – FFB Supplier, between PT Indo Sepadan Jaya and WJS – Wan Juma Sari Dewi (FFB Supplier). • Agreement Letter No. 01/CSV-KTS/VIII/2017 dated 24 Augustus 2017 – FFB Supplier, between PT Indo Sepadan Jaya and Koperasi Mandiri Tani Sejahtera (FFB Supplier). <p>Based on the agreement document (Contract cooperation agreement) that have been verified above, there are explanations on legal requirements, employment (including wages) and compliance with legislation and obligations to respect human rights and business ethics in article 1 No. 6- 9; and No. 13 related to business ethics.</p>	
2.2.3	<p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour.</p> <p>- Minor compliance -</p>	<p>Based on document review during ASA1.3 it was known that third party contract including for FFB supplier has completed with some important clause such as:</p> <ul style="list-style-type: none"> • The company policy related to children/underage worker, anti-drugs, forced, trafficked labour, etc. 	Complied

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		<ul style="list-style-type: none"> Worker's payment referred to local minimum payment's regulation. All workers will be register in health insurance and workers insurance according to national regulation. <p>All of contract data kept by Head Clerk in Estates and Mill.</p>	
Criteria 2.3: All FFB supplies from outside the unit of certification are from legal sources.			
2.3.1	<p>(C) For all directly sourced FFB, Palm Oil Mill (POM) requires:</p> <ul style="list-style-type: none"> Information regarding the geolocation of FFB origins; Proof of ownership status, right/claim of the land by grower/smallholder; If relevant, valid planting/operational/trading license, or is part of a cooperative which allows the buying and selling of FFB. <p>- Critical (Major) compliance -</p>	<p>Based on document verification and interview to the management during ASA1_3, it was known that the unit of certification already has a list of directly sourced of FFB supplier, there are four (4) directly sourced of FFB supplier that has identified by the company namely:</p> <ol style="list-style-type: none"> CV Bumdes Tebing Tinggi Pangkatan Sejahtera (TTPS) Roma Iwan Haryono (IWH) Marlon Brando Sibarani (MHS) <p>The sample document for the requirement of indicator 2.3.1 has shown during audit namely Marlon Brando Sibarandi (MBS), as per purchase contract between PT ISJ and Marlon Brando Sibarandi (MBS). The contract has covered the land status, legal requirement and other policy related to RSPO requirements. In addition, mill also validated the geo location of plots.</p> <p>Verified sample:</p> <ul style="list-style-type: none"> Ramsi, with area 20Ha; geolocation E 99° 56' 18.492" ; N 2° 6' 56.160"; land status SKGR (<i>Surat Keterangan Ganti Rugi</i>). Roy, with area 10Ha; geolocation E 99° 57' 31.104" ; N 2° 3' 56.988"; land status SHM (<i>Sertifikat Hak Milik</i>). <p>Operational/Trading License:</p>	Complied

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		Nomor Induk Berusaha (NIB) No. 03xxxxx from Lembaga OSS Badan Koordinasi Penanaman Modal dated 02 November 2021 on behalf Marlon Brando Sibarandi (MBS).	
2.3.2	For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in indicator 2.3.1. - Minor compliance -	Based on document review and interview to the management during ASA1.3 it was known that there are 3 indirectly sourced FFB supply to Tanjung Selamat Palm Oil Mill. The indirect of FFB suppliers are CV Palta Jaya, Wan Juma Sari Dewi (WJD) and Wan Juma Sari Dewi-KS and Koperasi Mandiri Tani Sejahtera (MTS). Verified sample for Koperasi Mandiri Tani Sejahtera (MTS).: <ul style="list-style-type: none"> - Rudi Alba, with area 10 Ha; geolocation E 100° 5' 19.89" N 2° 10' 22.63"; land status SKT (<i>Surat Keterangan Tanah</i>). - Iwan G, with area 10 Ha; geolocation E 100° 4' 8.05" N 2° 9' 35.96"; land status SKGR (<i>Surat Keterangan Ganti Rugi</i>). Operational/Trading License Koperasi Mandiri Tani Sejahtera (MTS) is NIB (<i>Nomor Induk Berusaha</i>) has shown during audit.	Complied
Principle 3: Optimise productivity, efficiency, positive impact and resilience Implement plans, procedures and systems for continuous improvement.			
Criteria 3.1: There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.			
3.1.1	(C) A business or management plan (minimum of three years) is documented and where applicable, includes a jointly developed business case for Scheme Smallholders. - Critical (Major) compliance -	A business management plan for long term economic feasibility has been documented by the Unit of Certification. The business management plan has included projection of production, quality planting material, mill extraction rates (OER and KER), upkeep cost, harvesting cost, transport cost, forecast price and capital expenditure. Management plan was set up including independent FFB suppliers. Its management plan includes: 1. FFB Production projection 2024 – 2026	Complied

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		<ol style="list-style-type: none"> 2. CPO, PK, production projection 2024 – 2026 3. OER, KER projection 2024 – 2026 4. Estate Cost Estimation: Upkeep cost, manuring cost, pest and disease management cost, pruning cost, census cost, terrace maintenance cost, road and bridge maintenance cost, harvesting cost. 5. Mill Cost, KCP Cost, Selling cost, Bulking cost and Tax portion actual 2022 and projection 2024 – 2026. 6. Replanting Program. 7. Net Profit/Loss. <p>Projection of Production 2024 - 2026:</p> <table> <tr> <th rowspan="2">Description</th><th colspan="3">Year</th></tr> <tr> <th>2024</th><th>2025</th><th>2026</th></tr> <tr> <td>FFB:</td><td></td><td></td><td></td></tr> <tr> <td>Tanjung Selamat Estate</td><td>121,825</td><td>126,698</td><td>133,033</td></tr> <tr> <td>Pangkalan Estate</td><td>98,116</td><td>102,041</td><td>107,143</td></tr> <tr> <td>Total Own</td><td>219,941</td><td>228,739</td><td>240,176</td></tr> <tr> <td>3rd party</td><td></td><td></td><td></td></tr> <tr> <td>Grand Total</td><td>120,000</td><td>120,000</td><td>120,000</td></tr> <tr> <td>CPO:</td><td></td><td></td><td></td></tr> <tr> <td>Own</td><td>46,858</td><td>48,732</td><td>51,169</td></tr> <tr> <td>3rd Party</td><td>21,900</td><td>21,900</td><td>21,900</td></tr> <tr> <td>Grand Total</td><td>68,758</td><td>70,632</td><td>73,069</td></tr> </table>	Description	Year			2024	2025	2026	FFB:				Tanjung Selamat Estate	121,825	126,698	133,033	Pangkalan Estate	98,116	102,041	107,143	Total Own	219,941	228,739	240,176	3 rd party				Grand Total	120,000	120,000	120,000	CPO:				Own	46,858	48,732	51,169	3 rd Party	21,900	21,900	21,900	Grand Total	68,758	70,632	73,069	
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		<table> <tr> <td>PK:</td><td></td><td></td><td></td></tr> <tr> <td>Own</td><td>9,567</td><td>9,950</td><td>10,448</td></tr> <tr> <td>3rd Party</td><td>5,220</td><td>5,220</td><td>5,220</td></tr> <tr> <td>Grand Total</td><td>14,787</td><td>15,170</td><td>15,668</td></tr> </table>	PK:				Own	9,567	9,950	10,448	3rd Party	5,220	5,220	5,220	Grand Total	14,787	15,170	15,668	
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3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available. - Minor compliance -	There is no replanting plan during audit because currently all are immature and mature plant, based on document review during ASA1_3 it was known that the last replanting is conducted in Y2020.	Complied																
3.1.3	The unit of certification holds management review at planned term according to the scale and nature of the activities undertaken. - Minor compliance -	<p>Based on document review during ASA1_3, it was known that management review for Tanjung Selamat POM & Estate conducted on 28 March 2024 and Pangkatan Estate on 4 March 2024, attended by Technical Manager Labuhan Batu, Mill Manager, Mill Assistant, KTU, Biogas Assistant and Sustainability Assistant. The management review has discussed:</p> <p>a. Result of internal audit that conducted on 19-24 February 2024: For the internal audit of RSPO, there are 2 nonconformance for Pangkatan Estate related to the need of new mother and socialization of company policy, non conformance has been closed in March 2024. For the Tanjung Selamat POM & Estate there is no nonconformance report found during internal audit.</p> <p>b. Customer feedback; Feedback from customers can be conveyed through the mechanism of stakeholder information. The company also provides a feedback receipt logbook to monitor the response when there is input from consumers.</p> <p>c. Process performance;</p>	Complied																

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		<p>Tanjung Selamat Palm Oil Mill has scheduled VE visits, as a supervision for regular mill performance (once a year). If there is input from the VE visit, it is in the form of quick input, which is immediately corrected and reported back in the form of observations that can be checked at the next visit. The issues are related to VE result has been followed up by the organization.</p> <p>d. Preventive Action; For the non-conformity of the unit regarding the result of internal audit, POM has determined the Preventive Action for the issues.</p> <p>e. Follow Up Action; For the non-conformity of the unit regarding the result of internal audit, POM has determined the Follow Up Action for the issues.</p> <p>f. Change that effects the Management System; Revising some mechanism relatred to the need of new mother and socilaization of company policy.</p> <p>g. Point Recommendation (a-f) Increased Effectiveness: Documentation is further improved Resources needed: Increasing knowledge through training.</p>	
Criteria 3.2: The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.			
3.2.1	(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impact and opportunities of the unit of certification. - Critical (Major) compliance -	Continues Improvement (CI) were developed by organization is by following up the non-conformities of the internal audit. Also, that have CI Report annually to create improvements in their activities mill and estates. The CI report already demonstrated during audit. For example, mill has established CI program related to reduce the use of POM electricity for lighting and controlling. The other report for example at	Complied

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		<p>the Mill there was a record of continuous improvement to reduce broken kernel from 20.50% to 18.50% by decreasing ripple mill rotation and ripple mill efficiency. By the Estate to increased harvest productivity to 2.24 tons/HK with the integration of progressive pruning system.</p> <p>Internal audit agronomy and internal audit mill report also has verified during audit, for example Visit Engineering (VE) report, e.g., VE report of Tanjung Selamat POM, date of visit 22 - 27 January 2024, report "Laporan Kunjungan HM" by Darren Hew Joseph. Main issues: sterilization efficiency and low kernel extraction.</p> <p>Monitoring of estate operation recorded in Visit Agronomy (VA) report, e.g., VA report of Tanjung Selamat Estate, dated 30 March – 6 April 2023 by Mr Simon Sihotang. Main issues: the circle is not visible for the tree grows not upright, lumpy fertilizer was found, spraying quality, pruning quality.</p>	
3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat by Certification Body during Annual Surveillance Assessment by using the RSPO metrics template.</p> <p>- Minor compliance -</p>	<p>RSPO Annual Communication of Progress 2021 of PT Inti Indosawit Subur has been available in RSPO website under membership number 1-0022-06-000-00. At the time of the audit, the RSPO Metrics template has been shown during audit.</p> <p>The auditor has verified the RSPO Metric template that has been sent by client before the audit, the RSPO Metrics Templates has been verified and the data is appropriate.</p>	Complied
Criteria 3.3: Operating procedures are appropriately documented, consistently implemented and monitored.			
3.3.1	<p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p>Tanjung Selamat Estate and Pangkatan Estate have demonstrated procedures for estate operation, starts from land preparation including replanting up to harvesting, there is no change related to SOP until this ASA1_3, the SOPs such as:</p> <ol style="list-style-type: none"> 1. SOP AA-APM-OP-1100.01-R4 dated 5/09/2016 <i>Pembibitan</i>, explains Nursery. 2. SOP AA-APM-OP-1100.02-R3 10/06/2015 <i>Penanaman Areal Baru</i>, 	Complied

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		<p>explains New Area Palnting.</p> <p>3. SOP AA-APM-OP-1100.03-R2 24/07/2015 <i>Pembuatan dan Perawatan Jalan dan Jembatan</i>; explains road and bridge construction and maintenance.</p> <p>4. SOP AA-APM-OP-1100.04-R3 07/12/2015 <i>Pembuatan dan Pemeliharaan Parit</i>; explains culvert/drainage construction and maintenance.</p> <p>5. SOP AA-APM-OP-1100.05-R3 23/11/2016 <i>Konservasi Tanah dan Air</i>; explains Soil & Water Conservation.</p> <p>6. SOP AA-APM-OP-1100.06-R6 16/02/2017 <i>Menanam Kacangan</i>; related to Planting cover crops.</p> <p>7. SOP AA-APM-OP-1100.07-R6 16/02/2017 <i>Menanam Kelapa Sawit</i>; related to Planting Oil Palm.</p> <p>8. SOP AA-APM-OP-1100.08-R6 11/05/2016 <i>Pengendalian Gulma</i> or Weed control.</p> <p>9. SOP AA-APM-OP-1100.09. R5 5/09/2016 <i>Pemupukan</i>; related to Fertilizer application.</p> <p>10. SOP AA-APM-OP-1100.10. R6 23/11/2016 <i>Pengendalian Hama dan Penyakit</i>; explains Pests & Disease Control.</p> <p>11. SOP AA-APM-OP-1100.11. R1 01/02/2009 <i>Pestisida dan Pengendaliannya</i>; explains for pesticide handling.</p> <p>12. SOP AA-APM-OP-1100.12. R3 23/11/2016 <i>Kastrasi</i>; explains castration (cutting all generative product (male flower, female flower, all fruit, to support vegetative growth) – done 5-6 months before being harvested.</p> <p>13. SOP AA-APM-OP-1100.13. R3 04/03/2016 <i>Tunas Pokok</i> for pruning.</p> <p>14. SOP AA-APM-OP-1100.14. R3 16/02/2017 <i>Sensus dan Identifikasi Pokok</i>; explains census and palm identification;</p>	
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		<p>15. SOP AA-APM-OP-1100.15. R2 01/10/2010 <i>Sensus Produksi</i> related to production census.</p> <p>16. SOP AA-APM-OP-1100.16. R1 01/02/2009 <i>Konsolidasi Pohon Tumbang</i>; explains provision of support to fallen palm.</p> <p>17. SOP AA-APM-OP-1100.17. R1 23/10/2014 <i>Pengelolaan Air</i>; related to water management.</p> <p>18. SOP AA-APM-OP-1100.18. R3 20/04/2015 <i>Potong Buah</i> related to harvesting.</p> <p>19. SOP AA-APM-OP-1100.19. R1 01/02/2009 <i>Pengelolaan Transport</i> explains FFB Transport.</p> <p>20. SOP AA-APM-OP-1100.20-R6 16/02/2017 Replanting.</p> <p>Tanjung Selamat POM has established a procedure to process the FFB to become CPO and PK starts from reception of FFB to dispatch of CPO and PK, there is no change related to SOP until this ASA1_3, the SOPs such as:</p> <ol style="list-style-type: none"> 1. SOP AA-MPM-OP-1400.02. R2 <i>Stasiun Penerimaan</i> for FFB receiving station. 2. SOP AA-MPM-OP-1400.03.R1 <i>Stasiun Rebusan</i> for sterilizer 3. SOP AA-MPM-OP-1400.04.R1 <i>Stasiun Pemisahan Berondolan</i> for loose fruit separation. 	
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place.</p> <p>- Minor compliance -</p>	<p>The unit of certification has a mechanism to check consistent implementation of procedures is in place, namely internal audit that conducted by Agronomy Dept and Engineering Dept, and Sustainability Dept. Monitoring on palm oil mill operation recorded on Visit Engineering (VE) report, e.g., VE report of Tanjung Selamat POM, date of visit 22 - 27 January 2024, report "Laporan Kunjungan HM" by Darren Hew Joseph. Main issues: sterilization efficiency and low kernel extraction.</p>	Non-compliance

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		<p>Monitoring of estate operation recorded in Visit Agronomy (VA) report, e.g., VA report of Tanjung Selamat Estate, dated 30 March – 6 April 2023 by Mr Simon Sihotang. Main issues: the circle is not visible for the tree grows not upright, lumpy fertilizer was found, spraying quality, pruning quality.</p> <p>During field visit and interviews with spray workers at Blocks C14m Afd III Tanjung Selamat Estate and B18j Afd II Pangkatan Estate, they were informed that after rinsing, PPE was stored at home. This is raise as Non-Conformity.</p>	
3.3.3	<p>Records of monitoring and any actions taken are maintained and available.</p> <p>- Minor compliance -</p>	<p>The unit of certification has done monitoring on palm oil mill and estates operation. Monitoring on palm oil mill operation recorded on Visit Engineering (VE) report, e.g., VE report of Tanjung Selamat POM, date of visit 22 - 27 January 2024, report "Laporan Kunjungan HM" by Darren Hew Joseph. Main issues: sterilization efficiency and low kernel extraction.</p> <p>Monitoring of estate operation recorded in Visit Agronomy (VA) report, e.g., VA report of Tanjung Selamat Estate, dated 30 March – 6 April 2023 by Mr Simon Sihotang. Main issues: the circle is not visible for the tree grows not upright, lumpy fertilizer was found, spraying quality, pruning quality.</p>	Complied
<p>Criteria 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.</p>			
3.4.1	<p>(C) SEIA in new planting or operation including mills, is conducted independently and participatively by involving the affected stakeholders, inclusive of impact assessment from the smallholder/outgrower scheme (if any). The assessment is to be documented.</p> <p>- Critical (Major) compliance -</p>	<p>During ASA-1.3-year 2024, the auditor team has review that there is no new planting at PT Indo Sepadan Jaya Tanjung Selamat POM and its Supply bases (Tanjung Selamat Estate & Pangkatan Estate). Tanjung Selamat Estate has been planted since 1992, 1993, 1995, 1997 and 1998. Tanjung Selamat Estate has conducted replanting since 2012 – 2017 while Pangkatan Estate has conducted replanting since 2015 – 2020.</p>	Complied

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		<p><u>Tanjung Selamat Estate (PT Indo Sepadan Jaya)</u></p> <p>During ASA-1.3-year 2024, there is no changing and extension to scope related to the mill and estate operation.</p> <p>The preparation of the SEIA report is based on the Terms of Reference for SEL (KA-SEL) "<i>Kerangka acuan Studi Evaluasi Lingkungan</i>" which was approved by the Central AMDAL Commission of the Ministry of Agriculture No. 998/AMDAL/V/1993, May 4, 1993, and the results of field surveys at the study site.</p> <p>Social Impact Assessment was conducted as documented in "<i>Studi Evaluasi Lingkungan</i>" which covering social impact assessment. Ministry Agriculture has approved this SEL (<i>Studi Evaluasi Lingkungan</i>) based on decree No. RC.220/385/B/II/94.</p> <p>Tanjung Selamat Estate has conducted replanting since 2012 – 2017. Replanting activity has been included in the SEIA documents.</p> <p>In 2019, PT Indo Sepadan Jaya was develop the Biogas Plant and make the addendum of SEIA to include the activity in the SEIA document. Company has obtained the permit for Biogas Plant according to "Keputusan Kepala Dinas Penanaman Modal dan Pelayanan terpadu Satu Pintu Kabupaten Labuhan Batu Nomor 503.660/117/DPMPTSP-BP2MNP/2019 Tanggal 20 Februari 2019 Tentang Perubahan Izin Lingkungan Kegiatan Perkebunan Kelapa Sawit Pabrik Minyak Kelapa Sawit dan Biogas Plant yang terletak di Desa Kampung padang Kecamatan pangkatan Kabupaten Labuhan Batu.</p> <p><u>Pangkalan Estate (PT Rantau Sinar Karsa)</u></p> <p>During ASA-1.3-year 2024, there is no changing on social environmental impact assessment of Pangkatan Estate - PT Rantau Sinar Karsa.</p> <p>The preparation of the SEL report is based on the Terms of Reference for SEL (KA-ANDAL) which was approved by the Central AMDAL</p>	
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		<p>Commission of the Ministry of Agriculture No. 49/AMDAL/V/1993, May 4, 1993, and the results of field surveys at the study site.</p> <p>Social Impact Assessment was conducted as documented in "Study Evaluasi Lingkungan" (SEL) which covering social impact assessment. Ministry Agriculture has approved this SEL based on decree No. RC.220/383/B/II/94 dated 26 February 1994.</p> <p>During SEL, the company conducted stakeholders meeting with surrounding local communities which affected the project, e.g., public consultation on 12th March 2014 involved representative from 3 villages (Kampung Padang Village, Sennah Village and Perlabian Village) and attended 66 participants.</p>	
3.4.2	<p>For the unit of certification, a SEIA is available and social and environmental management plan and its monitoring have been developed with participation of affected stakeholders.</p> <p>- Minor compliance -</p>	<p>During ASA-1.3-year 2024, SEIA document was available and kept in office. Social and environmental management plan and its monitoring have been developed as per RKL – RPL document. RKL – RPL document is part of SEL document which has been communicated and involving the affected parties and stakeholder, e.g., public consultation on 12th March 2014 involved representative from 3 villages (Kampung Padang Village, Sennah Village and Perlabian Village) and attended 66 participants.</p> <p>Social Environment management plan to prevent negative impact such as:</p> <ul style="list-style-type: none"> • To prevent air quality decrease, company performed action: Reduce exhaust emissions from the engines by maintenance routine engine, the use of anti-dust mask continuously for workers who are near the source of pollutants that exceed the threshold. • To prevent water quality decrease, maintaining green areas along the riverbanks, do not logging in the riverbanks area, planting land cover crop on the cliffs and prone to erosion areas, the use of wastewater for Land Application, solid waste utilization plant (shell, fiber) for fuel. 	Complied

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		<ul style="list-style-type: none"> • To prevent erosion: land clearing mechanically, land cover crop planting, terracing in slope. • To prevent wildlife habitat disturbance, place signboard to prohibit illegal hunting in conservation area and around estate, awareness to employee and surrounding community to save the protected species. • To increase job opportunities, provide employment opportunities to the local community, the provision of supporting infrastructure for public economic activities, providing employment opportunities information to the public. <p>To increase in public revenues, maximize the use of local labor, involving the local community as business partners.</p>	
3.4.3	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in participatory way.</p> <p>- Critical (Major) compliance -</p>	<p>During ASA-1.3-year 2024, PT Indo Sepadan Jaya has demonstrated the document on implementation of social and environmental management and monitoring as per "Laporan Hasil Pelaksanaan RKL – RPL". Report of RKL – RPL were reviewed, evaluated and reported each semester to government institution (DLH Kab. Labuhan Batu, DLH Provinsi Sumatera Utara, PPE Region Sumatera and Kementerian Lingkungan Hidup dan Kehutanan.</p> <p>Evidence of RKL – RPL report and its reporting evidence to government can be demonstrated during audit. Sample seen: Report of RKL – RPL PT Indo Sepadan Jaya semester II year 2023, reported on 24 January 2024. The document has been submitted to Dinas Lingkungan Hidup dan Kehutana Kabupaten Labuhanbatu.</p> <p>There were no significant changes required in current practices of identification and evaluation of environmental aspect and impact.</p> <p>Environmental management and monitoring have been implemented such as:</p>	Complied

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		<ul style="list-style-type: none"> Water management by developing Watergate and drainage in peat soil area, water level monitoring to manage the water level in 40 – 60 cm under ground level. Waste management according to the best management practice procedure: wastewater management, biogas plant installation, hazardous waste management based on regulation. Boiler and incinerator maintenance to prevent air pollution, emission monitoring for boiler, incinerator and generator set Report RKL – RPL are publicly available for stakeholder to be access and reviewed. <p>PT Indo Sepadan Jaya – Tanjung Selamat POM has demonstrated the document on monitoring of RKL-RPL, such as:</p> <ul style="list-style-type: none"> Monitoring of Genset emissions and noise in Genset Room I (GS01). Emission Quality Testing Standards: Regulation of the Minister of Environment and Forestry No. 11 of 2021 (Attachment I no. 1) - Noise Testing Standards: Regulation of the Minister of Manpower and Transmigration of the Republic of Indonesia No. 05 of 2018. The result of testing for second semester 2023, such as: <table border="1"> <thead> <tr> <th>Parameter</th><th>Satuan</th><th>Standard</th><th>Result</th></tr> </thead> <tbody> <tr> <td>Partikulat</td><td>mg/Nm³</td><td>-</td><td>22.89</td></tr> <tr> <td>SO₂</td><td>mg/Nm³</td><td>-</td><td><2.53</td></tr> <tr> <td>No₂</td><td>mg/Nm³</td><td>3400</td><td>390.53</td></tr> <tr> <td>CO</td><td>mg/Nm³</td><td>170</td><td>167.16</td></tr> <tr> <td>Opasitas</td><td>%</td><td>-</td><td><20</td></tr> <tr> <td>O₂</td><td>%</td><td>-</td><td>18.56</td></tr> <tr> <td>Kecepatan gas</td><td>m/s</td><td>-</td><td>9.66</td></tr> </tbody> </table>	Parameter	Satuan	Standard	Result	Partikulat	mg/Nm ³	-	22.89	SO ₂	mg/Nm ³	-	<2.53	No ₂	mg/Nm ³	3400	390.53	CO	mg/Nm ³	170	167.16	Opasitas	%	-	<20	O ₂	%	-	18.56	Kecepatan gas	m/s	-	9.66	
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		<table><tr><td>Laju Alir</td><td>@m³/s</td><td>-</td><td>0.043</td></tr><tr><td>CO2</td><td>%</td><td>-</td><td>1.70</td></tr><tr><td>Kebisingan</td><td>dB(A)</td><td>85</td><td>82.2</td></tr></table> <ul style="list-style-type: none">Monitoring of Domestic Wastewater Quality - Parameter: PerMenLH No. 68 of 2016. The result for second semester 2023: <table><tr><th>Parameter</th><th>Satuan</th><th>Result</th><th>Method</th></tr><tr><td colspan="4">FISIKA</td></tr><tr><td>Total Padatan Tersuspensi (TSS)</td><td>Mg/l</td><td>18.3</td><td>SNI 06-6989.3:2004</td></tr><tr><td colspan="4">KIMIA</td></tr><tr><td>Ph</td><td>Mg/l</td><td>6.93</td><td>SNI 06-6989.11:2004</td></tr><tr><td>Amoniak</td><td>Mg/l</td><td>1.257</td><td>SNI 06-6989-30-2005</td></tr><tr><td>BOD</td><td>Mg/l</td><td>17.2</td><td>SNI 6989-72:2009</td></tr><tr><td>COD</td><td>Mg/l</td><td>56.76</td><td>SNI 6989.2:2009</td></tr><tr><td colspan="4">b. Kimia Organik</td></tr><tr><td>Minyak dan Lemak</td><td>Mg/l</td><td>2.8</td><td>SNI 6989.10:2011</td></tr><tr><td colspan="4">c. Mikrobiologi</td></tr><tr><td>Total Coliform</td><td>MPN/10 0 ml</td><td>350</td><td>APHA 23rd 9222-J, 2017</td></tr></table>	Laju Alir	@m³/s	-	0.043	CO2	%	-	1.70	Kebisingan	dB(A)	85	82.2	Parameter	Satuan	Result	Method	FISIKA				Total Padatan Tersuspensi (TSS)	Mg/l	18.3	SNI 06-6989.3:2004	KIMIA				Ph	Mg/l	6.93	SNI 06-6989.11:2004	Amoniak	Mg/l	1.257	SNI 06-6989-30-2005	BOD	Mg/l	17.2	SNI 6989-72:2009	COD	Mg/l	56.76	SNI 6989.2:2009	b. Kimia Organik				Minyak dan Lemak	Mg/l	2.8	SNI 6989.10:2011	c. Mikrobiologi				Total Coliform	MPN/10 0 ml	350	APHA 23 rd 9222-J, 2017	
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Criteria 3.5: A system for managing human resources is in place.																																																															
3.5.1	Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives in accordance with the applicable regulation.	Company unit has procedures related to employment which are regulated in several documents as follows:	Complied																																																												

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	- Minor compliance -	<ul style="list-style-type: none"> SOP recruitment and employee selection No. SOP: AA-HR-305.2-r0 dated 1 February 2009 regarding recruitment and selection of employee. SOP Nomor : AA-FA-219.1-R5 revision 5 regarding Wages dated 01 May 2016 Memorandum No. 034/ISJ-RSK/MEMO/IX/20 on 1 September 2020 issued by Group Manager regarding employee recruitment. Collective Labour Agreement of PT ISJ and RSK period 2022 – 2024 This collective labour agreement has described regarding employment regulations starting from entry hours, wages, promotions, sanctions, to holidays. 	
3.5.2	Employment procedures are implemented and records are maintained. - Minor compliance -	<p>The implementation of employment procedures includes the following:</p> <p>Employee promotion</p> <ul style="list-style-type: none"> Promotion of employees during the period 2022 - 2024 for 63 harvesting daily worker who have been approved by the manager of PT RSK and have been acknowledged by the Head of the Labuhan Batu Regency Manpower Office. Promotion of employees during the period 2022 - 2024 for 83 harvesting daily worker who have been approved by the manager of PT ISJ and have been acknowledged by the Head of the Labuhan Batu Regency Manpower Office. Appointment of daily worker of the Tanjung Selamat mill for the period 2022 - 2024 for 5 employees who have been approved by the Factory manager and have been acknowledged by the Head of the Labuhan Batu Regency Manpower Office. <p>Employee Performance Assessment</p> <p>The company conducts annual performance appraisals as one of the bases for determining promotions. The aspects assessed include work</p>	Complied

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		<p>performance, teamwork, and good relationships with superiors or co-workers.</p> <p>The results of interviews with worker representatives and trade union representatives show that the company has implemented its employment procedures fairly and transparently.</p>	
Criteria 3.6: An Occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	<p>(C) All operational activities risks assessed to identify the H&S issues. Mitigation plans and procedures are documented and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>PT Indo Sepadan Jaya – Tanjung Selamat POM has established the health and safety policy under “Kebijakan Perusahaan”, signed by Managing Director of Asian Agri Group, on 1st December 2019 Point 3. Committed to implement and maintain occupational health and safety management system in compliance with national and international applicable regulation.</p> <p>Up to ASA-1.3-year 2024, the policy has not changed. The policy was communicated to all employees and displayed at strategic locations of Mill and Estates and communicated to employees including contractor workers. Last refreshment on socialization the policies has carried out on 15th February 2024, 26 February 2024. The document verified such as: attendance list, training material and photograph.</p> <p>PT Indo Sepadan Jaya – Tanjung Selamat POM has defined the OHS risk assessment procedure SOP “<i>Identifikasi bahaya, Penilaian Resiko dan Penentuan Pengendalian</i>” AA-SMK3-02-R0 dated 3 August 2017 was established and implemented for Mill and Estates activities both routine and non-routine activities. Hierarchy of control was considered for planning of risk control. According to the procedure, the OHS risk assessment and analysis must be reviewed once a year. Risk assessment in plantation were available.</p> <p>Tanjung Selamat Estate, Tanjung Selamat Mill and Pangkatan Estate have conducted Hazard Identification & Risk Assessment and Control</p>	Complied

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		<p>(HIRAC)/Risk Analysis revision and reviewed on 12 January 2024. It consists of a risk assessment, controlling and its control targets.</p> <p>The hazard identification has covered all activities in the Estate and Mill, among other land clearing, manuring, harvesting, road maintenance, FFB transport, IPM activities, weighbridge, grading station, sterilizer station, pressing station, engine room, boiler, dispatch of CPO. All working risks have been identified and mitigated, such as by giving regular training, increasing supervision, PPE provision, and regular medical check-up.</p> <p>Based on field observation and interview with workers and Labor Union, the HIRAC has been implemented in the field such as by giving regular dissemination of OHS awareness and provision of appropriate PPE.</p> <p>PT Indo Sepadan Jaya – Tanjung Selamat POM has demonstrated the document of OHS Program year 2024, where this program is a control to reduce or mitigate the risk of accidents, which included:</p> <ul style="list-style-type: none"> • OHS Meeting • Safety trainings, • Safety inspection, • Safety parameters monitoring, • Medical Check-up • Handling of incidents, • Emergency simulation, • Fire-fighting tools monitoring, • Safety report, • Safety committee meeting, 	
3.6.2	(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.	During ASA-1.3-year 2024, PT Indo Sepadan Jaya – Tanjung Selamat POM has demonstrated the document of the effectiveness of the OHS	Complied

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	- Critical (Major) compliance -	<p>Program to address health and safety risks for period year 2024, such as:</p> <ul style="list-style-type: none"> • Monthly OHS Committee meeting, to discuss and address current OHS issues. Last meeting on 8th April 2024 • Report of OHS performance (three months basis) as per document of "Laporan Triwulan P2K3" period I – year 2024, - has been submitted to Dinas Ketenagakerjaan Kabuaptan Labuhanbatu. • Record on emergency response drill, dated 14th November 2023. In 2024 will be planned in November 2024. • OHS inspection reported under document – sample seen dated 25 April 2024. The result: there was found the AP boots was broken (2 harvester). The follow up: change the AP boots. • PPE usage monitoring period March and April 2024: PPE monitoring performed in daily basis by each department. PPE monitoring present in "Checklist Pengiran APD". • OHS inspection conducted each month by OHS expert and team each month. OHS inspection covering: PPE usage inspection, unsafe action and unsafe condition in area of: Workshop, harvesting, spraying working, manuring, housing. OHS inspection schedule 2024 were sighted. • Inspection and working environment observation, industry hygiene training, conducted on 17 March 2024 that was attended by 32 workers. • Refreshment training on accidents investigation training, conducted on 17 March 2024 that was attended by 32 workers. • Refreshment on training for first aiders, conducted on 16th February 2024 that was attended by 23 workers. 	
Criteria 3.7: All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.			
3.7.1	(C) A documented programme that provides training is in place, which is accessible to all staff, workers, scheme smallholders, and outgrowers taking into account gender- specific needs, and which covers applicable	PT Indo Sepadan Jaya – Tanjung Selamat POM has a department which is responsible for the training program, which is the Asian Agri Learning Institute. The department has a 2024 training program recorded in the	Complied

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	<p>aspects of P&C Principles, in a form they understand and includes assessment of the training.</p> <p>- Critical (Major) compliance -</p>	<p>year 2024 training calendar including Estate and Mill.</p> <p>The training program is divided into several aspects: technical, Administration, Environments & Sustainability and special certifications and there are also training involving vendors or operational suppliers. Training Program year 2024 consisted of:</p> <ul style="list-style-type: none"> • Refresh of SOP Handling of pests and diseases, planned in February to February 2024, • Spraying Training; will be held in March 2024 • Heavy equipment (Operational and Maintenance), planned in June 2024, • Training on the principle in the operation of steam machine, planned in October 2024. • Road maintenance training, planned in October 2024. • Sustainability awareness (include traceability, mass balance and HCV), planned in June 2024, • Basic fire training, planned in November 2024. • Fire equipment and service, planned in June 2024. • Training Core Team, planned in August 2024 <p>Job safety analysis training, planned in May and September 2024.</p>	
3.7.2	<p>Records of training are maintained, where appropriate on an individual basis.</p> <p>- Minor compliance -</p>	<p>During ASA-1.3-year 2024, the audit team has reviewed the employee data (master of Employees) and training data personal records, the Asian Agri Learning Institute Department will recommend the Estate and Mill to participate in a training program annually and will also evaluate the effectiveness of the training that has been followed.</p> <p>All trainings that have been attended by employees in the recording of "Personal Data Training". Training record consisted of the Training Calendar year 2024, the list of participants attending the trainees, and some photographs of the activities at the time of training.</p> <p>The training realizes based on the Training calendar period 2024:</p>	Complied

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		<ul style="list-style-type: none"> • Refreshment on socialization the policies has carried out on 15th February 2024, 26 February 2024. The document verified such as: attendance list, training material and photograph. • Inspection and working environment observation, industry hygiene training, conducted on 17 March 2024 that was attended by 32 workers. • Refreshment training on accidents investigation training, conducted on 17 March 2024 that was attended by 32 workers. • Refreshment on training for first aiders, conducted on 16th February 2024 that was attended by 23 workers. • Refreshment training of IPM procedure, carried out on 15th February 2024, 26 February 2024 that was attended by 43 workers. • Fire drill training – dated 34 April 2024 that was attended by 32 workers (fire responses team) • Training on awareness of the RSPO requirement dated 16th February 2024 that was attended by 23 workers. • Refreshment training on traceability training and bookkeeping for supply chains, conducted on 24 April 2024 that was attended by 6 participants from Tanjung Selamat Mill. 	
3.7.3	<p>Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.</p> <p>- Minor compliance -</p>	<p>PT Indo Sepadan Jaya – Tanjung Selamat POM has prepared the training for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS).</p> <p>The last refreshment training on traceability training and bookkeeping for supply chains, conducted on 24 April 2024 that was attended by 6 participants from Tanjung Selamat Mill.</p> <p>Training attend by participants: Mill Manager, production clerk, weighbridge clerk, KTU/administration, Dispatch and Sustainability team. Evidence of training can be demonstrated (note of training, photo, and attendance list).</p> <p>During ASA-1.3-year 2024, the auditor team has with Mill Manager, production clerk, weighbridge clerk, KTU/administration, Dispatch team,</p>	Complied

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		they have demonstrated the understanding regarding the RSPO SCCS implementation and process in Tanjung Selamat Palm Oil Mill.	
Criteria 3.8: Supply chain requirements for mills. Procedure note: all requirements are classified as Critical Indicators . However it will not contribute to suspension if there is more than 5 non-compliance within a principle)			
3.8.1	Identity Preserved Module A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme. Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.	The indicator is not applicable. Up to ASA-1.3-year 2024, Tanjung Selamat Palm Oil Mill physically receives and process FFB from certified and non-certified sources, therefore the applicable RSPO Supply Chain Module is CPO Mills: Mass Balance.	Not Applicable
3.8.2	Mass Balance Module A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.	Up to ASA-1.3-year 2024, there was no change in the supply chain module since last assessment. Tanjung Selamat Palm Oil Mill physically receives and process FFB from certified and non-certified sources, therefore the Tanjung Selamat Palm Oil Mill physically receives and process FFB from certified and non-certified sources, therefore the applicable RSPO Supply Chain Module is CPO Mills: Mass Balance.	Complied
3.8.3	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage	During ASA-1.3-year 2024, Tanjung Selamat POM has demonstrated the estimate volume of CPO and PK in a year period, and it was recorded by the CB in Public Summary report and Certificate, consists estimate of FFB receiving from Tanjung Selamat Estate, Pangkatan estate and Third-Party supplier, extraction rates, processing capacity, working hour, utilization. The actual tonnage produced are recorded in each annual surveillance report.	Complied

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	produced shall then be recorded in each subsequent annual surveillance report.	<table><tr><th>Estate – own supply bases</th><th>Forecast (Aug 2023 – July 2024) – of FFB</th></tr><tr><td>Tanjung Selamat Estate</td><td>115,277</td></tr><tr><td>Pangkalan Estate</td><td>65,258</td></tr><tr><td>Total</td><td>180,535</td></tr></table> <p>CPO (OER: 21.27 %) ~ 38,399.80 MT.</p> <p>PK (KER: 4.35 %) ~ 7,853.27 MT.</p>	Estate – own supply bases	Forecast (Aug 2023 – July 2024) – of FFB	Tanjung Selamat Estate	115,277	Pangkalan Estate	65,258	Total	180,535	
Estate – own supply bases	Forecast (Aug 2023 – July 2024) – of FFB										
Tanjung Selamat Estate	115,277										
Pangkalan Estate	65,258										
Total	180,535										
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	During ASA-1.3-year 2024, PT Indo Sepadan Jaya – Tanjung Selamat POM is a palm oil mill which takes legal ownership and physically handled RSPO certified sustainable oil palm product, therefore the site has been registered in RSPO IT Platform with ID number RSPO_PO1000002607.	Complied								
3.8.5	<p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <p>a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</p> <p>b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</p> <p>c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill’s procedures for the implementation of this standard.</p>	<p>Up to ASA-1.3-year 2024, there was no change in documented procedure since last assessment.</p> <p>PT Indo Sepadan Jaya – Tanjung Selamat POM has demonstrated the documented procedure, such as:</p> <ul style="list-style-type: none">Standard Operating Procedures – Traceability (AA-MPM-OP-1400.17.R7) dated 1 October 2019. The procedures cover traceability of CPO and PK, since FFB receiving from Tanjung Selamat and Pangkatan Estate, processing up to shipping of CPO and PK as well as daily production report. The procedure also regulates the internal audit by Sustainability Internal Audit Manager. Traceability records are to be kept for 10 years.Standard Operating Procedure – Bookkeeping (AA-MPM-OP-1400.18- R4) dated 25 February 2015. The procedure explains method to check only certified product received. The bookkeeping	Complied								

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	<p>d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill.</p>	<p>mass balance issued every 3 months: January-March, April-June, July-September, and October-December each year. Head of Environment and Sustainability will inform to Certification Body in the case of projected overproduction.</p> <ul style="list-style-type: none"> • SOP of Palm Oil Mill operation: <ul style="list-style-type: none"> ➤ SOP AA-MPM-OP-1400.02. R2, dated 1 September 2011, Stasiun Penerimaan (FFB Receiving Station) ➤ SOP AA-MPM-OP-1400.03. R1, dated 1 February 2009, Stasiun Rebusan (Sterilizer). ➤ SOP AA-MPM-OP-1400.04. R1, dated 1 February 2009, Stasiun Pemisahan Berondolan (Loose Fruit Separation) ➤ SOP AA-MPM-OP-1400.05-R1, dated 1 February 2009, Stasiun Pengadukan dan Pengempaan (Pressing Station) ➤ SOP AA-MPM-OP-1400.06-R1, dated 1 February 2009, Stasiun Pemurnian (Clarification) ➤ SOP AA-MPM-OP-1400.07-R1, dated 1 February 2009, Stasiun Pemisahan Nut dan Fiber (Nut and Fiber separation) ➤ SOP AA-MPM-OP-1400.08-R1, dated 1 February 2009, Stasiun Kernel (Kernel Station) ➤ SOP AA-MPM-OP-1400.09-R1, dated 1 February 2009, Stasiun Boiler ➤ SOP AA-MPM-OP-1400.10-R1, dated 1 February 2009, Stasiun Engine Room. ➤ SOP AA-MPM-OP-1400.11-R1, dated 1 February 2009, Stasiun Water Treatment. ➤ SOP AA-MPM-OP-1400.12-R1, dated 1 February 2009, Laboratorium. ➤ SOP AA-MPM-OP-1400.13-R1, dated 1 February 2009, Stasiun Pengelolaan Limbah (Palm Oil Mill Effluent Treatment). ➤ SOP AA-MPM-OP-1400.14-R2, dated 1 September 2011, Stasiun Penimbunan dan Pengiriman CPO dan Kernel (CPO and PK Storage and Dispatch). 	
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		<p>➤ SOP AA-MPM-OP-1400.15-R1, dated 1 February 2009, Perawatan (Preventive Maintenance and Repair).</p> <p>PT Indo Sepadan Jaya – Tanjung Selamat POM has also demonstrated, updated, and completed the records and report demonstrating compliance with the supply chain’s general requirement and modular requirement, including training records.</p> <p>As per Procedure of Traceability (AA-MPM-OP-1400.17-R7), the responsible person in charge (PIC) to the supply chain system is Mill Manager. During ASA1_2 audit, based on interview it was known that the mill manager was able to demonstrate sufficient knowledge and understanding on RSPO supply chain implementation for palm oil mill.</p> <p>The procedure SOP AA-MPM-OP-1400.02. R2, dated 1 September 2011, Stasiun Penerimaan (FFB Receiving Station) has include receiving of certified and non-certified FFB. The mill uses supply chain Model Mass Balance, contamination is allowed.</p>	
3.8.6	<p>Internal Audit</p> <p>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill;</p> <p>a) Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>b) Effectively implements and maintains the standard requirements within its organisation.</p> <p>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p>	<p>PT Indo Sepadan Jaya – Tanjung Selamat POM has defined the procedure of traceability (AA-MPM-OP-1400.17-R7). In section chapter 6.7, Sustainability Internal Audit Manager conducted internal audit 1 times in a year, to ensure all operational and documentation activities are comply to the requirement in RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. The site has effectively implemented and maintains the standard requirement by performing internal audit.</p> <p>Data verified during ASA-1.3-year 2024, such as:</p> <ul style="list-style-type: none"> • Latest Internal audit carried out on 19 – 24 February 2024. The standard of the audit: RSPO P&C Indonesia NI 2020 that include Supply Chain requirement. • Internal audit report is available, described that there are no non- 	Complied

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		conformities found.	
3.8.7	<p>Purchasing and Goods In</p> <p>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>	<p>PT Indo Sepadan Jaya – Tanjung Selamat POM has defined the procedure of Traceability (AA-MPM-OP-1400.7. R6), in section 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 Indo Sepadan Jaya – Tanjung Selamat POM has also defined Standard Operating Procedure – Bookkeeping (AA-MPM-OP-1400.18-R4) explains that Head of Environment and Sustainability will inform to Certification Body in the case of projected overproduction.</p> <p>In the case on non-conforming raw material entering the process, PT Indo Sepadan Jaya – Tanjung Selamat POM has the mechanism to handle non-conforming material and/or document.</p> <p>During ASA-1.3-year 2024, PT Indo Sepadan Jaya – Tanjung Selamat POM has demonstrated the simulation on recall of non-conforming material.</p> <p>PT Indo Sepadan Jaya – Tanjung Selamat POM has purchased FFB from certified and non-certified source.</p> <ul style="list-style-type: none"> • Certified source consists of own estate, Tanjung Selamat Estate, and sister company estate (Pangkalan Estate - PT Rantau Sinar Karsa). • Non-certified FFB sourced from third party supplier, e.g.: Roma, Palta Jaya UD Ula Tersia, UD Sahabat, William Tanizar and CSV (Create Share Value). Tonnage of certified and non-certified FFB are recorded in Laporan Harian Pabrik (Mill Daily Report). <p>Data verified of Purchasing and Goods In</p>	Complied

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		<ul style="list-style-type: none"> • FFB Certified: <ul style="list-style-type: none"> ➤ From Tanjung Selamat Estate. Weighbridge Ticket No. PTSA12314*** dated 10 April 2024; Div. 4; to PT Indo Sepadan Jaya – Tanjung Selamat Mill; Delivery date is 10 April 2024; Commodity is Certified FFB; Net weight 6,850 kg; (448 bunches); certificate no. RSPO620704; Transport Internal; Delivery Note KTSPM01202305231****; Vehicle register No. BK 8067 ET. ➤ From Pangkatan Estate. Weighbridge Ticket No. PTSA4231342*** dated 9 April 2024; to PT Indo Sepadan Jaya – Tanjung Selamat Mill; Delivery date is 9 April 2024; Commodity is Certified FFB; Net weight 7,100 kg; (760 bunches); certificate no. RSPO620704; Transport Internal; Delivery Note KPTDT35202423428****; KPTDT352024234****; Vehicle register No. BK 9698 YK. • FFB non-certified: <ul style="list-style-type: none"> ➤ Supplier Wan Jumasari Dewi (WJD-KS). Weighbridge Ticket No. PTSA5213**** dated 10 May 2024; from Supplier Wan Jumasari Dewi (WJD-KS) to PT Indo Sepadan Jaya – Tanjung Selamat Mill; Delivery date is 23/05/2023; Commodity is Outside FFB; Net weight 8,974 kg; total 561 bunches; Transport General; Delivery Note 024; Vehicle register No. BM 9314 PO; Driver Alang. ➤ From Supplier Wan Jumasari Dewi (WJD-KS). Weighbridge Ticket No. PTSA5213**** dated 10 April 2024; to PT Indo Sepadan Jaya – Tanjung Selamat Mill; Delivery date is 10 April 2024; Commodity is Outside FFB; Net weight 7,910 kg; total 486 bunches; Transport General; Delivery Note 065; Vehicle register BK 8001YN. ➤ From Supplier Palta Jaya. Weighbridge Ticket No. PTSA523204955 dated 7 April 2024; to PT Indo Sepadan Jaya – Tanjung Selamat Mill; Delivery date is 7 April 2024; Commodity is Outside FFB; Net weight 1,120 kg; total 320 	
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		bunches; Transport General; Delivery Note 059; Vehicle register No. BK 8270FN.	
3.8.8	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ol style="list-style-type: none"> The name and address of the buyer; The name and address of the seller; The loading or shipment / delivery date; The date on which the documents were issued; RSPO certificate number; A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); The quantity of the products delivered; Any related transport documentation; A unique identification number. 	<p>PT Indo Sepadan Jaya – Tanjung Selamat POM has defined the procedure of Traceability (AA-MPM-OP-1400.17.R7), in Section 5.2 has mentioned the Marketing Manager issued Delivery Order (DO) with information: name and address of production unit, name and address of buyer, contract number, type of product transportation (land/sea), distance, type of product (CPO or PK, certified or non-certified), quantity of product, delivery date, product qualification specification (CPO or PK: FFA, water content, dirt, etc.), Supply chain model (Mass Balance).</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.</p> <p>Data verified during ASA-1-3-year 2024, such as:</p> <ul style="list-style-type: none"> Product: CSPO - Weighbridge ticket No. PTSC232005411; dated 10 February 2024; Seller PT Indo Sepadan Jaya – Tanjung Selamat POM; Buyer PT Sari Dumai Sejati; Commodity RSPO certified CPO; Supply Chain Model Mass Balance; Quantity 27,100 kg; FFA 3.25%; Moisture 0.20%; Dirt 0.022%; DO No. 05**/DC**/11/23; Supply chain certificate RSPO 620704. <p>Product: CSPO: Weighbridge ticket No. PTSC23200321; dated 13 October 2023; Seller PT Indo Sepadan Jaya – Tanjung Selamat POM; Buyer PT Sari Dumai Sejati; Commodity RSPO certified CPO; Supply Chain Model Mass Balance; Quantity 28,200 kg; FFA 3.12%; Moisture 0.21%; Dirt 0.023%; DO No. 050**/DC**/08/23; Supply chain certificate RSPO 620704</p>	Complied

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		<p>Based on sales document verified, information required are included, as follow:</p> <ul style="list-style-type: none"> • The name and address of the buyer • The name and address of the seller • The loading or shipment / delivery date • The date on which the documents were issued. • RSPO certificate number • A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations) • The quantity of the products delivered. • Any related transport documentation • A unique identification number 	
3.8.9	<p>Outsourcing Activities</p> <p>i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification.</p> <p>ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure</p>	<p>Up to ASA-1.3-year 2024, there was not outsource at processing activities at POM.</p> <p>PT Indo Sepadan Jaya – Tanjung Selamat POM have agreement with third party for the transport of CPO and PK. The transport for RSPO certified sustainable CPO and PK delivery was carried out by CV Jaya Pertama and CV Sejahtera Abadi Medan for certified CPO; and CV Sekawan Jaya for certified Palm Kernel.</p> <p>Contract documents were available. Example: Perjanjian Pengangkutan” No. 04/VI/SA-ISJ/2020 dated 4 June 2020 between PT Indo Sepadan Jaya and CV Sejahtera Abadi regarding transport of CPO and PK.</p>	Complied

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	<p>that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</p>	<p>The contract is not stated validity of contract. Section 2 “Perjanjian Pengangkutan” conveyed that the term of the agreement is in accordance with the agreement of both parties.</p> <p>Based on the contract that stated in the article 7 (Responsibility and Obligation), point 1.m. stated that the contractor willing to meet the requirements of the Supply Chain Certification System when transporting raw materials and be willing to be audited by a second party internal auditor and an external party auditor from the certification body appointed by the second party if necessary.</p> <p>The contract has been signed by both parties means that the outsourcing party understood the RSPO Supply Chain requirements.</p>	
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	<p>PT Indo Sepadan Jaya – Tanjung Selamat POM have agreement with third party for the transport of CPO and PK. The transport for RSPO certified sustainable CPO and PK delivery was carried out by CV Jaya Pertama and CV Sejahtera Abadi Medan for certified CPO; and CV Sekawan Jaya for certified Palm Kernel.</p> <p>Contract documents were available. Example: Perjanjian Pengangkutan” No. 04/VI/SA-ISJ/2020 dated 4 June 2020 between PT Indo Sepadan Jaya and CV Sejahtera Abadi regarding transport of CPO and PK.</p> <p>In Section 2 “Perjanjian Pengangkutan” conveyed that the term of the agreement is in accordance with the agreement of both parties.</p>	Complied
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	<p>The site committed to inform CB relate name and contact details of any new contractors as mentioned in SOP “SOP Traceability AA-MPM-OP-1400.17-R7 dated 1 October 2019”.</p> <p>PT ISJ – Tanjung Selamat POM informed the CB prior the audit through pre information audit checklist. During this audit AS2.3 there is no new contractors.</p>	Complied

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3.8.12	<p>Record keeping</p> <p>i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.</p> <p>ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.</p> <p>iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p>iv) For Mass Balance Module, the mill:</p> <p>a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</p> <p>b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock).</p>	<p>PT Indo Sepadan Jaya – Tanjung Selamat POM has demonstrated complete, up-to-date, and accessible records and reports covering all aspects of RSPO Supply Chain Certification Standard requirements.</p> <p>PT Indo Sepadan Jaya – Tanjung Selamat POM has also defined the procedure of Traceability (AA-MPM-OP-1400.7. R6), requires that all records and reports related to traceability and book keeping are retained for a period of 10 years.</p> <p>Tanjung Selamat POM uses Mass Balance Module for supply chain. Tanjung Selamat POM has record and balances all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on monthly basis, as shown in Bookkeeping Mass Balance Report. Monthly report was generated from weighbridge card, summarized daily in mill daily report, summarized monthly in Mill Operation Summary, then summarized in Bookkeeping Mass Balance Report.</p> <p>Conversion rate is only applied to provide reliable estimation of CPO and PK produced for annual budget. All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system (Bookkeeping Mass Balance Report).</p> <p>Tanjung Selamat POM only deliver certified CPO and PK sales from a positive stock. Audit team verified there was no short-selling and/or negative stock at the end of period.</p> <p>Data verified for the confirm the record keeping, such as:</p> <ul style="list-style-type: none"> • Laporan Harian Pabrik (Mill Daily Report); dated 10 April 2024 and 9 April 2024 • Monthly Report – Mill, period February and April 2024. • Bookkeeping – monthly mass balance record of FFB processed, CPO and PK production, CPO, and PK deliveries for period April 2023 to March 2024, e.g: Kartu Timbangan (Weighbridge Card) FFB, Kartu 	Complied
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		Timbangan (Weighbridge Card) CPO and Kartu Timbangan (Weighbridge Card) PK.																					
3.8.13	Extraction Rate The oil extraction rate (OER) and the kernel extraction rate(KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.	PT Indo Sepadan Jaya – Tanjung Selamat POM has demonstrated the report of oil extraction rate (OER) and Kernel extraction Rate (KER) to provide reliable estimation of CPO and PK produced for annual budget. OER and KER are set based upon experience, documented, and applied it consistently. Based on “Distribusi Produksi Bulanan Anggaran 2024” budget for 2024 are as follows: CPO (OER: 22 %) and PK (KER: 4.50 %)	Complied																				
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	OER and KER are updated periodically to ensure accuracy against actual performance. Based on daily report Laporan Harian Pabrik (Mill Daily Report); dated 10 April 2024 and 9 April 2024 and Monthly Report – Mill, period February and April 2024 -> CPO (OER: 21.7 %) and PK (KER: 4.30 %)	Complied																				
3.8.15	Processing For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.	The indicator is not applicable. Tanjung Selamat POM implement Mass Balance Module	Not Applicable																				
3.8.16	Registration of Transactions i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date. ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.	PT Indo Sepadan Jaya – Tanjung Selamat POM has made Shipping Announcement for certified CSPO and CSPK sold. Shipping Announcement: <table><tr><th>Transaction ID</th><th>Buyer</th><th>Product</th><th>Volume</th><th>Status</th></tr><tr><td>TR-04bfdb4d-d049</td><td>PT SMS</td><td>CSPK</td><td>1399,15</td><td>Confirmed</td></tr><tr><td>TR-2dc85128-e19e</td><td>PT. SDS</td><td>CSPO</td><td>4684,21</td><td>Confirmed</td></tr><tr><td>TR-653d9da0-963c</td><td>PT. SDS</td><td>CSPO</td><td>1610,8</td><td>Confirmed</td></tr></table>	Transaction ID	Buyer	Product	Volume	Status	TR-04bfdb4d-d049	PT SMS	CSPK	1399,15	Confirmed	TR-2dc85128-e19e	PT. SDS	CSPO	4684,21	Confirmed	TR-653d9da0-963c	PT. SDS	CSPO	1610,8	Confirmed	Complied
Transaction ID	Buyer	Product	Volume	Status																			
TR-04bfdb4d-d049	PT SMS	CSPK	1399,15	Confirmed																			
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TR-653d9da0-963c	PT. SDS	CSPO	1610,8	Confirmed																			

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		TR-21951b12-a158	PT. SDS	CSPO	1052,43	Confirmed	
		TR-9a8ec191-e5c2	PT. SDS	CSPO	578,87	Confirmed	
		TR-340dd474-be2e	PT. SDS	CSPO	1325,16	Confirmed	
		TR-46cbe547-422e	PT SMA	CSPK	2091,26	Confirmed	
		TR-191a52dd-a297	PT HSJ - NL KCP	CSPK	159,11	Confirmed	
		TR-4df9536e-eb41	PT. SDS	CSPO	526,13	Confirmed	
		TR-836ec65f-e877	PT. SDS	CSPO	26,97	Confirmed	
		TR-a55ed701-7c67	PT. SDS	CSPO	82,33	Confirmed	
		TR-54a929ce-5500	PT. SDS	CSPO	1000	Confirmed	
		TR-e592a35c-a7cf	PTSMA	CSPK	1609,9	Confirmed	
		TR-96ba5b17-15d8	PT. SDS	CSPO	565,64	Confirmed	
		TR-efc0c65f-d9d5	PT. SDS	CSPO	3500	Confirmed	
		TR-aff92162-58f8	PT. SDS	CSPO	1047,47	Confirmed	
		TR-f220a52e-0435	PT. SDS	CSPO	105,26	Confirmed	
		TR-140bf30a-7f93	PT. SDS	CSPO	1605,26	Confirmed	
		TR-4519cb56-0e72	PT. SDS	CSPO	500	Confirmed	
		TR-e755760a-9d87	PT. SDS	CSPO	444,12	Confirmed	
		TR-d7ba1d7b-0cee	PT. SDS	CSPO	1816,69	Confirmed	
		TR-337a98a9-42f7	PT. SDS	CSPO	2958,1	Confirmed	
		TR-a5f9f9d5-eb5c	PT. SDS	CSPO	1258,95	Confirmed	
		TR-5de305d8-8371	PT. SDS	CSPO	39,45	Confirmed	
		TR-7e65c500-5fe0	PT. SDS	CSPO	268,9	Confirmed	

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		<table><tr><td>TR-06124622-71e9</td><td>PT. SDS</td><td>CSPO</td><td>52,63</td><td>Confirmed</td></tr><tr><td>TR-dcad458b-2bb1</td><td>PT. SDS</td><td>CSPO</td><td>1052,64</td><td>Confirmed</td></tr><tr><td>TR-a1d81859-982b</td><td>PT. SDS</td><td>CSPO</td><td>281,09</td><td>Confirmed</td></tr><tr><td>TR-4f18d0ef-f8ce</td><td>PT. SDS</td><td>CSPO</td><td>1046,02</td><td>Confirmed</td></tr></table> <p>There is “Remove” transaction in the RSPO IT Platform for certified product, due to there is certified product has sold in the other RPSO scheme namely ISCC as detail below:</p> <ul style="list-style-type: none">- Volume to remove: 1,549.27MT- transaction ID: ST-TR-9091e210-a85a- Stock Transaction Status: Removed From Certified Stock- Removal Date: 06-05-2024	TR-06124622-71e9	PT. SDS	CSPO	52,63	Confirmed	TR-dcad458b-2bb1	PT. SDS	CSPO	1052,64	Confirmed	TR-a1d81859-982b	PT. SDS	CSPO	281,09	Confirmed	TR-4f18d0ef-f8ce	PT. SDS	CSPO	1046,02	Confirmed	
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3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	<p>PT Indo Sepadan Jaya – Tanjung Selamat POM has demonstrated the procedure for claims as stated at Traceability Procedure (AA-MPM-OP-1400.17-R7) dated 1 October 2019.</p> <p>The mill only makes claims on RSPO Certified product in compliance with RSPO Rules on Market Communications and Claims. Statement of RSPO certified and Mass Balance model are only stated in sales documents of RSPO certified product.</p> <p>PT Indo Sepadan Jaya – Tanjung Selamat POM has not made claims regarding the support of RSPO certified oil palm products. However the organization aware about the RSPO Rules on Market Communications and Claims.</p>	Complied																				
General corporate communications																							
4.1	<p>A corporate communication is one made by any RSPO member that highlights its RSPO membership and/or its commitment to the objectives</p>	<p>PT Indo Sepadan Jaya is a subsidiary of RSPO registered member PT Inti Indosawit Subur. The corporate communication of PT Inti Indosawit</p>	Complied																				

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	and principles of RSPO. Corporate communication is a "non-product related" claim.	Subur can be seen in the company website, under brand Asian Agri at the address www.asianagri.com .	
4.2	In corporate communications, a member is allowed to: A. display its RSPO membership status B. display the RSPO web address (www.rspo.org) C. state that the member supports the work of RSPO D. state the member's history with regard to RSPO E. use the RSPO Trademark (as shown below) with a valid trademark licence number to promote its RSPO membership	There is no change information since last audit. Corporate communication in Asian Agri website: <ul style="list-style-type: none"> Display its RSPO membership status: On the website of Asian Agri, it was stated the company is RSPO Member since February 2006. Display the RSPO web address: Not in direct manner. In Asian Agri website, company made a link to RSPO website. State the member supports the work of the RSPO: Not in direct manner. On the website, Asian Agri wrote "In 2006, Asian Agri became a member of the Roundtable of Sustainable Palm Oil (RSPO), a global multi-stakeholder certification system to develop and implement global standards for sustainable palm oil production. We received our 1st RSPO certification for our estate in 2010, and in 2012, the certification for our smallholder scheme." State the member's history with regards to the RSPO: Yes. On the website of Asian Agri, it was stated the company is RSPO Member since February 2006. Use of RSPO Trademark to promote its membership of the RSPO: on the website, the company does not display RSPO Trademarks and corporate logo. .	Complied
4.3	Members are not allowed to use the RSPO corporate logo as shown below. This is for the sole use of the RSPO Secretariat.	No, the Asian Agri website did not display the RSPO Corporate Logo.	Complied
4.4	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 palm oil products.	Yes. In the Asian Agri website, stated that the company is RSPO Member since February 2006. However, the statement did not lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Complied

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4.5	<p>Additionally, RSPO certified members are allowed to make statements that highlight their RSPO certification status and product-related claims in their corporate communication tools. Some permitted examples include:</p> <ul style="list-style-type: none"> • “We have been sourcing RSPO certified palm oil since (YEAR).” • “We have used (X) tonnes of RSPO certified palm oil for our products manufactured in the last year.” • “We have been RSPO certified since (YEAR).” • “We have (X NUMBER OF PRODUCTS) produced using RSPO certified MB/SG palm oil.” • “In (YEAR), our company sourced (X%) of palm oil derivative volumes that was used across our products manufactured as MB certified.” • “Our company covered (X%) of palm oil derivative volumes used across all our products manufactured in (YEAR) with smallholder credits.” • “We are RSPO certified. Ask us for our RSPO certified products.” 	<p>In the Asian Agri website, stated that the company is RSPO Member since February 2006. However, it is clear that the statement did not lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.</p>	Complied
4.6	<p>RSPO non-certified members are allowed to make product-related claims in their corporate communication tools by doing the following:</p> <p>A. Use the RSPO Trademark with a valid trademark licence number to promote its membership of RSPO. It is sufficient for non-certified members to indicate this only once in their communication.</p> <p>B. Claim statements are limited to the following examples:</p> <ol style="list-style-type: none"> “The rate of RSPO-certified palm oil procurement was (X%). We aim to achieve (X%) sustainable procurement by fiscal year (YEAR).” X% of palm oil sourced by our organisation are certified through the Roundtable on Sustainable Palm Oil (RSPO) supply chains as (a) Identity Preserved, (b) Segregated, (c) Mass Balance, or (d) Book and Claim. <p>C. In cases wherein an organisation/member would like to indicate their commitment to sourcing RSPO certified volumes, the statement shall be accompanied with a disclaimer: “This reported figure is not audited through RSPO Certification”.</p>	<p>PT Indo Sepadan Jaya – Tanjung Selamat POM is a certified member as a subsidiary of RSPO registered member PT Inti Indosawit Subur. The corporate communication of PT Inti Indosawit Subur can be seen in the company website, under brand Asian Agri at the address www.asianagri.com. Asian Agri website display RSPO Trademarks with valid trademark licence number 1-0022-06-100-00. Therefore, this is not applicable.</p>	Not Applicable

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Product-specific communications			
5.1 General			
5.1.1	Product-specific communications refer to any public statement about an individual product that contains RSPO certified sustainable palm oil. These product-specific communications can be made on pack and/or off pack such as shipping documents, advertisements, flyers, brochures, posters, displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews.	PT Indo Sepadan Jaya – Tanjung Selamat POM Product-specific communications made under sales contract, DO and weighbridge ticket/delivery note. Stated in sales documents that the product they sold is RSPO Certified model MB.	Complied
5.1.2	Product-specific communications are voluntary.	PT Indo Sepadan Jaya – Tanjung Selamat POM stated the supply chain model and certificate number, e.g. in sales contract, DO and weighbridge ticket/delivery note.	Complied
5.1.3	Wherever the RSPO Label is displayed for product-specific communications, the applicable trademark licence number must be shown immediately under or next to the RSPO Label or the statement itself.	PT Indo Sepadan Jaya – Tanjung Selamat POM did not display the RSPO label for product-specific communications.	Complied
5.1.4	Use of any other trademark or label to highlight the presence of RSPO certified sustainable palm oil products is an unauthorised product-specific communication.	PT Indo Sepadan Jaya – Tanjung Selamat POM did not use RSPO trademark or any other trademark or label to highlight the presence of RSPO certified sustainable palm oil products	Complied
5.1.5	<p>If any organisation, which does not further modify end products or does not need to undergo Supply Chain Certification such as retailers, traders or distributors, enters into any agreement whereby the RSPO certified supplier labels products with the retailers/traders/distributors RSPO Trademark licence number, the following conditions shall be met as shown below</p> <ul style="list-style-type: none"> • RSPO members should be registered on the RSPO IT Platform and complete the information under 'description of products' field. • Both parties shall inform their certification body in writing about the agreement. 	PT Indo Sepadan Jaya – Tanjung Selamat POM is a palm oil mill; thus, this indicator is not applicable.	Not Applicable

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	<ul style="list-style-type: none"> The RSPO certified supplier is responsible for ensuring that the buyer's RSPO Trademark licence number is used only on products that are supplied to that buyer. 		
5.1.6	Organisations that do not further modify end products or that do not need to undergo Supply Chain Certification such as retailers, traders, or distributors who intend to use the RSPO Label with their own RSPO Trademark licence number in any of their product-specific communications, can do so by undergoing a remote audit. A remote audit shall be conducted by an RSPO-accredited certification body (CB) prior to the use of the RSPO Label whereby the organisation will need to demonstrate that the use is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain	PT Indo Sepadan Jaya – Tanjung Selamat POM is a palm oil mill; thus, this indicator is not applicable.	Not Applicable
5.2 Off pack claims			
5.2.1	Off pack claims are product-specific communications regarding the certified sustainable palm oil contained within the product(s) made on any communication materials such as shipping documents, advertisements, flyers, brochures, posters, displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews. The RSPO Label should be used together with the valid trademark licence number wherever an off pack claim is made.	PT Indo Sepadan Jaya – Tanjung Selamat POM did not use RSPO trademark or logo in the product specific communication. PT Indo Sepadan Jaya – Tanjung Selamat POM Product-specific communications made under sales contract, DO and weighbridge ticket/delivery note. Stated in sales documents that the product they sold is RSPO Certified model Mass Balance.	Complied
5.2.2	When confirming the sale of certified palm oil products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	It was verified that when selling certified oil palm product, PT Indo Sepadan Jaya – Tanjung Selamat POM stated the supply chain model and certificate number, e.g. in sales contract, DO and weighbridge ticket/delivery note.	Complied
5.2.3	Where a distributor or wholesaler takes title to products containing certified sustainable palm oil products, the requirements of the RSPO SCCS can follow either one of these two options:	PT Indo Sepadan Jaya – Tanjung Selamat POM is a palm oil mill; thus, this indicator is not applicable.	Not Applicable

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	<ul style="list-style-type: none"> • If the distributor or wholesaler holds only a distributor licence, it may only communicate RSPO certified palm oil 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 products have been made on behalf of the distributor or wholesaler, with specific evidence either through on pack claims or documentation. • If the distributor or wholesaler is supply chain certified, they should follow the requirements outlined in section 5.2.2. 		
5.3 On pack claims			
5.3.1	Only RSPO members who have supply chain certification and members who have undergone remote audit as per 5.1.6 are allowed to make on pack claims about the certified sustainable palm oil contained within the product(s) as per Module A, B, C and E. RSPO members who have purchased RSPO Credits are entitled to claim their support for the production of certified sustainable palm oil as per Module D.	PT Indo Sepadan Jaya – Tanjung Selamat POM is subsidiary of PT. Inti Indosawit Subur, a member of RSPO, with RSPO membership No.1-0022-06-000-00 since 6 February 2006. PT Indo Sepadan Jaya – Tanjung Selamat POM sold its oil palm product in bulk, there was no on-pack claim used.	Complied
5.3.2	<p>In case of limited space, RSPO allows flexibility to use a one-line arrangement claim together with a valid trademark licence number for on pack communications as below without having to use any RSPO Label. The licence number has to measure at least 4pt (1.4mm) in size and the font must be Calibri. The following options shall be considered:</p> <p>A) For Identity Preserved (IP)/ Segregated (SG) Certified Products:</p> <ul style="list-style-type: none"> • RSPO IP/SG CERTIFIED* • Contains RSPO IP/SG palm oil* • Contains RSPO certified palm oil (IP/SG)* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	PT Indo Sepadan Jaya – Tanjung Selamat POM sold its oil palm product in bulk, there was no on-pack claim used.	Complied
	<p>B) or Mass Balance (MB) Certified Products:</p> <ul style="list-style-type: none"> • RSPO MIXED* • Contributes to the production of RSPO certified palm oil* 	PT Indo Sepadan Jaya – Tanjung Selamat POM sold its oil palm product in bulk, there was no on-pack claim used.	Complied

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	<ul style="list-style-type: none"> Contains RSPO certified palm oil (MB)* <p>*Add RSPO TM Licence Number below or next to the claim.</p>		
	<p>C) For Partially Certified Products:</p> <ul style="list-style-type: none"> RSPO 50% MIXED* Contains at least 50% RSPO certified palm oil* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	PT Indo Sepadan Jaya – Tanjung Selamat POM sold its oil palm product in bulk, there was no on-pack claim used.	Complied
	<p>D) For Products covered with Book and Claim (B&C):</p> <ul style="list-style-type: none"> RSPO CREDITS* Supports the production of RSPO certified palm oil* Contains palm oil covered by the purchase of RSPO Credits* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	PT Indo Sepadan Jaya – Tanjung Selamat POM sold its oil palm product in bulk, there was no on-pack claim used.	Complied
5.3.3	On pack claims shall not include information about the claimant's RSPO membership status.	PT Indo Sepadan Jaya – Tanjung Selamat POM sold its oil palm product in bulk, there was no on-pack claim used.	Complied
5.3.4	Members shall not communicate to consumers information about their suppliers' RSPO membership status.	The communication of PT Indo Sepadan Jaya – Tanjung Selamat POM has not mentioned to consumers information about their suppliers' RSPO membership status.	Complied
5.3.5	Use of the RSPO Label is restricted to claims about RSPO certified sustainable palm oil contained in products and is not authorised for use in relation to any other ingredient.	PT Indo Sepadan Jaya – Tanjung Selamat POM sold its oil palm product in bulk, up to this moment, PT Inti Indosawit Subur has not use RSPO label or trademark on their product.	Complied
5.3.6	All members making on pack claims are encouraged to submit the information and images of their end products that carry the RSPO Label via the MyRSPO portal.	PT Indo Sepadan Jaya – Tanjung Selamat POM sold its oil palm product in bulk, up to this moment, PT Inti Indosawit Subur has not use RSPO label or trademark on their product.	Complied
MODULE B – MASS BALANCE SPECIFIC RULES			
Mass Balance palm oil content			

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	95% of the palm oil content must be RSPO MB-certified.	PT Indo Sepadan Jaya – Tanjung Selamat Mill is producing and selling CSPO and CSPK; All CSPO/CSPK sold are 100 % content oil palm RSPO MB-certified.	Complied
	If 100% of RSPO MB certified palm oil content cannot be sourced, a maximum of 5% volume from other non-certified sources is allowed and the reason for this must be fully justified. The volume of the non-certified palm oil content shall be covered by the purchase of RSPO Credits of equivalent volume.	There is percentage of non-certified oil palm within the product CSPO/CSPK. PT Indo Sepadan Jaya – Tanjung Selamat Mill does not produce end consumer goods. The production are CPO and PK.	Complied
Messaging			
	Messaging ALLOWED in storytelling in product-specific communications includes: <ul style="list-style-type: none"> [Palm oil products]/[palm oil]/[palm kernel oil] from RSPO certified mills and plantations were mixed with non-certified palm oil products in the supply chain. The volume of [palm oil products]/[palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations.	PT Indo Sepadan Jaya – Tanjung Selamat Mill was not messaging in storytelling in product-related communications. It was verified during audit through sales contract, DO and dispatch slip (weighbridge card).	Complied
Product-Specific Communications Labelling			
	Members are allowed to use the RSPO Label in one of the following ways: <ul style="list-style-type: none"> The RSPO Label MUST contain the tag "MIXED". The tag "MIXED" designates palm oil products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag "MIXED" on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim. The RSPO Label can also include the statement: "[The palm oil contained in this product] contributes to the production of certified sustainable palm oil". 	PT Indo Sepadan Jaya – Tanjung Selamat Mill was not using the RSPO label or logo.	Complied

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Principle 4: Respect community and human rights and deliver benefit			
Respect community rights, provide equal opportunities, maximise benefits from engagement and ensure remediation where needed.			
Criteria 4.1: The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.			
4.1.1	<p>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, supply chain and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>There is no change of company policy until this assessment. Company Policy dated 01 December 2019 point 13 stated "Respect human rights by treating all employee fairly, both in term of acceptance, valuation, conditions and working environment, as well as representation regardless of tribe, <i>kasta</i>, national origin, religion/belief, disability, gender, sexual orientation, membership of trade union political affiliation and/or age". Other than that there is an Internal Memorandum No. 049/HO/MEMO/INT/03/20 from Head Operational on 20 March 2020: "Protection against the reporters/defenders of human rights defender from acts of revenge, intimidation and harassment".</p> <p>Interview result with worker representative and contractor representative, also community representative known that this policy has been socialized periodically. Socialization also conduct in sign or poster installation in several area for example main office, warehouse, and housing area. Interviewee stated that in the last one year period no issue related violation of human right.</p>	Complied
4.1.2	<p>The unit of certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations.</p> <p>- Minor compliance -</p>	<p>Interview result with stakeholder representative known that there is no violence and harassment issue in community or company area. No use of paramilitary or mercenaries in their operations.</p>	Complied
Criteria 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.			
4.2.1	<p>(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and</p>	<p>Company has SOP AA-GL-5005-R0 01 related handling complaint which described management of complaint handling for internal and external stakeholder. There is also SOP-AA-HR-308 0.5-R0 for handling employee</p>	Complied

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	<p>whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p> <p>- Critical (Major) compliance -</p>	<p>complaint. for whistle blower protection and confidentiality, the company established Case Reporting and Disclosure Guarantee Mechanism date June 12, 2015. This procedure is reference for handling complaint with sufficient manner for resolving.</p> <p>Interview result with stakeholder representative known that company has socialized procedure to affected parties.</p>	
4.2.2	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p> <p>- Minor compliance -</p>	<p>Procedure relates grievance and complaints described in SOP AA-GL-5005-R0 01 and SOP-AA-HR-308 0.5-R0. Interview result with stakeholder representative known that company has socialized procedure to affected parties. For illiterate parties these procedure socialized by community representatives, for example village heads or community leaders.</p>	Complied
4.2.3	<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>- Minor compliance -</p>	<p>Based on interviews with representatives of worker unions and representatives of the Labuhan Batu Regency Manpower Office, over the past year there have been complaints from employees regarding the process of appointment from contract workers to permanent employees. With this, several internal mediations have been held with the labor union and on June 16, 2022, a gradual employee appointment program was agreed upon.</p> <p>At the time this assessment was carried out, there was progress in the appointment of contract/Daily worker employees to permanent employees with the following summary:</p> <ul style="list-style-type: none"> Promotion of employees during the period 2022 - 2024 for 63 harvesting daily worker who have been approved by the manager of PT RSK and have been acknowledged by the Head of the Labuhan Batu Regency Manpower Office 	Complied

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		<ul style="list-style-type: none"> Promotion of employees during the period 2022 - 2024 for 83 harvesting daily worker who have been approved by the manager of PT ISJ and have been acknowledged by the Head of the Labuhan Batu Regency Manpower Office Appointment of daily worker of the Tanjung Selamat mill for the period 2022 - 2024 for 5 employees who have been approved by the Factory manager and have been acknowledged by the Head of the Labuhan Batu Regency Manpower Office <p>In 2024 the program will be completed, and each main job will be carried out directly by permanent employees. The labour department and the worker union said that to date the company is still adhering to the commitments it has made.</p> <p>Based on the description above, it can be concluded that the company has facilitated the resolution of existing complaints and grievances in accordance with the procedures, timeframes determined, and conveyed to the parties.</p>	
4.2.4	<p>The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.</p> <p>- Minor compliance -</p>	<p>Results of interviews with management representatives and stakeholder representatives as well as representatives of the Government Service found that for every complaint and grievance that occurs, an attempt is made to resolve it amicably. If it cannot be resolved or one party feels dissatisfied, it can be continued to the next stage and can appoint another person to represent him/her and the resolution can be reached by a third-party mediator.</p>	Complied
Criteria 4.3: The unit of certification contributes to local sustainable development as agreed by local communities.			
4.3.1	<p>Contributions to community development that are based on the results of consultation with local community are demonstrated.</p>	<p>Based on document review and interviews with representatives of Tanjung Selamat Village and Sennah Village, it is known that the company has realized its social responsibility to the surrounding</p>	Complied

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	- Minor compliance -	<p>community through Corporate Social Responsibility. The planned CSR programs include:</p> <ul style="list-style-type: none"> • Social Activity Program. • Economic Activity Program. • Health Activity Program. • Infrastructure Activity Program. <p>Realization of CSR plan in the current year for example:</p> <ul style="list-style-type: none"> • Road maintenance for Tanjung Selamat village • Partnership plantation with Sennah Village • Assistance for developing farmer plantation • Assistance for educational facilities for Sennah and Tanjung Selamat Villages • Assistance for religious holidays and national holidays • Social fund assistance for orphans, the poor, and the elderly who are unable to afford it <p>Stakeholder representative also stated that have been involved in the preparation of the CSR, for example through questionnaires during the EIA review and discussions during the <i>Musrembang</i> (Village development planning deliberation).</p>	
Criteria 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.			
4.4.1	<p>(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed (FPIC) process. Documents related to the history of land tenure and the actual legal or customary use of the land are available.</p> <p>- Critical (Major) compliance -</p>	<p>There is no change related land legality of PT ISJ and PT RSK due no extension scope or new development conduct by the the company. Document shown by company i.e:</p> <ol style="list-style-type: none"> 1. Decree of Menteri Agraria dan Tata Ruang/Kepala badan Pertanahan Nasional No. 5/HGU/BPN/90 dated 13 March 1990 and 	Complied

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		<p>Land Title Certificate No. 3 year 1993 covering area 4,336 Ha for PT Rantau Sinar Karsa and valid until 31 December 2089 (for 75 years). Renewal Hak Guna Usaha (HGU) from Kepala BPN no. 125/HGU/BPN/2004, concerning: Extension of Duration and Renewal of HGU on Land Located in Labuhan Batu Regency, North Sumatra Province (4,336 ha) with Land Certificate no. 3, year 1993 (Valid until 31 December 2080)</p> <p>2. Decree of BPN Head No. 3/HGU/BPN.12/XII/2017 on 21 December 2017, related "Pemberian HGU atas nama PT Indo Sepadan Jaya atas tanah terletak di Kabupaten Labuhan Batu, Provinsi Sumatera Utara" - issuance of land use tittle (HGU) of PT Indo Sepadan Jaya, with area 123.915 Ha for Tanjung Selamat Estate, valid for 35 years, based on map no. 07/2016 dated 16 May 2016.</p> <p>3. Decree of Menteri Agraria dan Tata Ruang/Kepala badan Pertanahan Nasional No. 20/HGU/KEM-ATR/BPN/III/2021 dated 25 March 2021 and Land Title Certificate No. 1394 year 2021 covering area 531.72 Ha for PT Indo Sepadan Jaya and valid until 25 March 2056.</p> <p>4. Decree of Menteri Agraria dan Tata Ruang/Kepala badan Pertanahan Nasional No. 48/HGU/KEM-ATR/BPN/VIII/2021 dated 8 August 2021 and Land Title Certificate No. 1337 year 2021 covering area 3,347.01 Ha for PT Indo Sepadan Jaya and valid until 4 August 2056.</p> <p>Total <i>HGU</i> owned by PT ISJ and PT RSK is 8,338.645 Ha. However, the scope of certification area is 8,237.32 Ha</p>	
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4.4.2	<p>Copies documents evidencing agreement- making processes and negotiated agreements detailing the FPIC process are available and include:</p> <ul style="list-style-type: none"> - Minor compliance - <p>4.4.2a Evidence that a plan has been developed through consultation and discussion held in good faith with all affected groups within the community, with specific assurances that vulnerable, minority and gender groups are asked for their opinions, and that information has been provided to all affected groups, including in it information about the steps taken to involve them in decision making.</p> <p>4.4.2b Evidence that the unit of certification has respected communities to give or withhold their consent to the operations at the time that these decisions were taken;</p> <p>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>Based on interviews with representatives of Sennah Village and Tanjung Selamat Village, it is known that the company already has a legal basis in the form of land title/<i>HGU</i> which has been extended so that documentation regarding the agreement process has occurred in the past. The source person said that until now there has never been a problem regarding the land so that because the acquisition process is based on an agreement between the parties.</p>	Complied
4.4.3	<p>(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).</p> <ul style="list-style-type: none"> - Critical (Major) compliance - 	<p>PT Indo Sepadan Jaya and PT Rantau Sinar Karsa has a cadastral map that carried out by Badan Pertanahan Nasional of North Sumatera Region and recorded on the Peta Bidang Tanah/Land Area Map i.e</p> <ul style="list-style-type: none"> • Land Area Map No. 12/12/2014, scale 1:20.000; on August 2014, covering area 3,347.01 Ha, location at Labuhan Batu Regency on the location permit No. 503.593/79/Ptnh/2014, dated 20 March 2014. • Land Area Map No. 12A/12/2014, scale 1:10.000; on August 2014, covering area 531.72 Ha, location at Labuhan Batu Regency on the location permit No. 503.593/79/Ptnh/2014, dated 20 March 2014. 	Complied

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		<ul style="list-style-type: none"> Land Area Map No. 07/2016 dated 16 May 2016, scale 1:10.000; on August 2014, covering area 123.915 Ha, location at Labuhan Batu Regency on the location permit No. 503.593/79/Ptnh/2014, dated 20 March 2014 Land Area Map No. 154/1993 dated 5 January 1993, scale 1:50.000; on August 2014, covering area 4,336 Ha, location permit no. 593.41/2834/K year 1989 for PT Rantau Sinar Karsa. <p>There is also operational map of Tanjung Selamat Estate - PT ISJ and Pangkatan Estate - PT RSK with scale 1 : 35,000 which describe area statement for the company for example planting area, planting year, boundaries, housing area, and infrastructure. The maps are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).</p>	
4.4.4	<p>All relevant information is available in appropriate forms and languages, including assessment of impact, proposed benefit sharing, and legal arrangements.</p> <p>- Minor compliance -</p>	As explained in indicator 4.4.1 the negotiation and agreement process has occurred in the past period. To update information and take the aspirations of the parties, the company periodically reviews the SIA and is explained in more detail in 3.4.1	Complied
4.4.5	<p>(C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.</p> <p>- Critical (Major) compliance -</p>	As explained in indicator 4.4.1 the negotiation and agreement process has occurred in the past period. To update information and take the aspirations of the parties, the company periodically reviews the SIA and is explained in more detail in 3.4.1	Complied
4.4.6	<p>There is evidence that implementation of agreement negotiated through FPIC is annually reviewed in consultation with affected parties.</p> <p>- Minor compliance -</p>	As explained in indicator 4.4.1 the negotiation and agreement process has occurred in the past period. To update information and take the aspirations of the parties, the company periodically reviews the SIA and is explained in more detail in 3.4.1	Complied
Criteria 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.			

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4.5.1	<p>(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.</p> <p>- Critical (Major) compliance -</p>	As explained in indicator 4.4.1 the negotiation and agreement process has occurred in the past period. There is no new planting conduct by the company	Complied
4.5.2	<p>(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions. All the relevant information and documents are made available, and community have option of resourced access to independent third-party advice through a documented, long-term and two- way process of consultation and negotiation.</p> <p>- Critical (Major) compliance -</p>	As explained in indicator 4.4.1 the negotiation and agreement process has occurred in the past period. There is no new planting conduct by the company. Based on interviews with representatives of Sennah Village and Tanjung Selamat Village, it is known that the company already has a legal basis in the form of <i>HGU</i> which has been extended so that documentation regarding the agreement process has occurred in the past. The source person said that until now there has never been a problem regarding the land so that because the acquisition process is based on an agreement between the parties.	Complied
4.5.3	<p>Evidence is available that affected local peoples understand they have the right to say 'agree' or 'not agree' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p> <p>- Minor compliance -</p>	As explained in indicator 4.4.1 the negotiation and agreement process has occurred in the past period. There is no new planting conduct by the company. Based on interviews with representatives of Sennah Village and Tanjung Selamat Village, it is known that the company already has a legal basis in the form of <i>HGU</i> which has been extended so that documentation regarding the agreement process has occurred in the past. The source person said that until now there has never been a problem regarding the land so that because the acquisition process is based on an agreement between the parties.	Complied
4.5.4	<p>To ensure local food and water security and as part of the FPIC process, SEIA participation and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of land allocations process.</p> <p>- Minor compliance -</p>	As explained in indicator 4.4.1 the negotiation and agreement process has occurred in the past period. There is no new planting conduct by the company. To update information and take the aspirations of the parties, the company periodically reviews the SIA and is explained in more detail in 3.4.1.	Complied
4.5.5	<p>Evidence is available that the affected communities and rights holders have had the option to access information and advice, that is independent</p>	As explained in indicator 4.4.1 the negotiation and agreement process has occurred in the past period. There is no new planting conduct by the company. Based on interviews with representatives of Sennah	Complied

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	of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands. - Minor compliance -	Village and Tanjung Selamat Village, it is known that the company already has a legal basis in the form of <i>HGU</i> which has been extended so that documentation regarding the agreement process has occurred in the past. The source person said that until now there has never been a problem regarding the land so that because the acquisition process is based on an agreement between the parties.	
4.5.6	Evidence is available that the communities or their representatives gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator. - Minor compliance -	As explained in indicator 4.4.1 the negotiation and agreement process has occurred in the past period. There is no new planting conduct by the company.	Complied
4.5.7	After 15 November 2018, new lands will not be acquired for plantations and mills as a result of recent (after November 2005) expropriations in the national interest (eminent domain) without FPIC process, except in cases of smallholders benefitting from agrarian reform or anti-drug programmes. - Minor compliance -	There is no new planting after 15 November 2018.	Complied
4.5.8	(C) New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	Interview result with Tanjung Selamat Village and Sennah Village representative also government representative known that there is no communities in voluntary isolation in areas inhabited. Based on document verification, management unit has no land expansion or new planting after November 2018.	Complied
Criteria 4.6: Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			
4.6.1	(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place. - Critical (Major) compliance -	Based on the ASA 1.3 audit results, there are no changes related to the Procedure for identifying legal, customary or user right, the documents are still the same as the previous audit results. The Certificate Holder has had a procedure to resolve land conflict, Standard Operating Procedure (SOP) No.AA-GL-5003.1-R2 revision 2	Complied

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		dated 8 May 2015 regarding Land Conflict Handling. The SOP described flow process and mechanism to handle land conflict. The SOP has taking into consideration the FPIC guide for RSPO Member 2015, whereby in the SOP has regulate information land conveyance, negotiation, participatory land measurement and other activities including engagement with relevant parties and other parties neighboring the plantation and/or conflict land. Including, identifying whether customary, legal or other rights and its compensation calculation.	
4.6.2	<p>(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	Mutually agreed procedure for procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established in (SOP) No. AA-GL-5003.1-R2 revision 2 dated 8 May 2015 regarding Land Conflict Handling. The SOP described flow process and mechanism to handle land conflict. The SOP has taking into consideration the FPIC guide for RSPO Member 2015, whereby in the SOP has regulate information land conveyance, negotiation, participatory land measurement and other activities including engagement with relevant parties and other parties neighboring the plantation and/or conflict land. Including, identifying whether customary, legal or other rights and its compensation calculation.	Complied
4.6.3	<p>Evidence is available that equal opportunities are provided to both men and women to hold land titles for smallholdings (if possible based on local law, customs and/or agreement).</p> <p>- Minor compliance -</p>	Interview result with management representative, Plantation Agency of Labuhan Batu, Sennah Village Representative, and Tanjung Selamat Representative known that equal opportunities are provides to both men and women to hold land title for smallholding. For example can be seen in member list of Gapoktan Sumber Rezeki, Mandiri Tani Sejahtera Cooperative, BUMDES Sejahtera, WJD Association, and KS Association.	Complied
4.6.4	<p>The process and outcomes of any negotiated agreements, compensation and payments are documented with evidence of the participation of affected parties and made available to them.</p> <p>- Minor compliance -</p>	As explained in indicator 4.4.1 the negotiation and agreement process has occurred in the past period. Interviews with representatives of Sannah Village and Tanjung Salamat Village, it is known that the company already has a legal basis in the form of <i>HGU</i> which has been extended so that documentation regarding the agreement process has	Complied

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		occurred in the past. The source person said that until now there has never been a problem regarding the land so that because the acquisition process is based on an agreement between the parties.	
Criteria 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.			
4.7.1	(C) A mutually agreed procedure for identifying people entitled to compensation is in place. - Critical (Major) compliance -	Company has a procedure to resolve land conflict, Standard Operating Procedure (SOP) No. AA-GL-5003.1-R2 revision 2 dated 8 May 2015 regarding Land Conflict Handling. The SOP described flow process and mechanism to handle land conflict. The SOP has taking into consideration the FPIC guide for RSPO Member 2015, whereby in the SOP has regulate information land conveyance, negotiation, participatory land measurement and other activities including engagement with relevant parties and other parties neighboring the plantation and/or conflict land. Including, identifying whether customary, legal or other rights and its compensation calculation.	Complied
4.7.2	(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties. - Critical (Major) compliance -	Mutually agreed procedure for procedure for calculating and distributing fair compensation is established in (SOP) No. AA-GL-5003.1-R2 revision 2 dated 8 May 2015 regarding Land Conflict Handling. The SOP described flow process and mechanism to handle land conflict. The SOP has taking into consideration the FPIC guide for RSPO Member 2015, whereby in the SOP has regulate information land conveyance, negotiation, participatory land measurement and other activities including engagement with relevant parties and other parties neighboring the plantation and/or conflict land. Including, identifying whether customary, legal or other rights and its compensation calculation.	Complied
4.7.3	Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development. - Minor compliance -	There is no plantation expansion conduct by PT Indo Sepadan Jaya and PT Rantau Sinar Karsa	Complied

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Criteria 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrated that they have legal customary, or user rights.			
4.8.1	Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC. - Minor compliance -	Based on the results of stakeholder consultations and documentation history, it is known that there are land claims in the PT Rantau Sinar Karsa area with 4 Farmer Group namely Bomban Seberang Farmer groups, Makmur Parduaan Farmer Group, Farmer Groups of Dusun V, VI, and VII and Plantation and Fishery Farmer Groups for an area of 2,062.16 Ha which is the river boundary. Until now, it is known that the land is on the river boundary for the Merbau Estate II division area, so it is outside the scope of certification.	Complied
4.8.2	(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms. - Critical (Major) compliance -		Complied
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4). - Minor compliance -		Complied
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). - Minor compliance -		Complied
Principle 5: Support smallholder inclusion			
Include smallholders in RSPO supply chains and improve their livelihoods through fair and transparent partnerships.			
Criteria 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			

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5.1.1	<p>Current and previous period prices for FFB are publicly available and accessible by smallholders.</p> <p>- Minor compliance -</p>	<p>During ASA1_3, it was known that the company has displayed the FFB price in Mill's notice board in front of the weighbridge station, all FFB suppliers can see it and able to access the FFB price by phone.</p> <p>The company cooperates with the surrounding community in terms of purchasing FFB and recorded in "<i>Pernyataan dan Jaminan</i>" - Statement and Guarantee as a supplier of FFB. The document stated that:</p> <ol style="list-style-type: none"> 1. FFB that supplied to Tanjung Selamat POM came from land that has been owned/controlled/cultivated in accordance with the legislation, especially in the field of land and plantation. 2. FFB supplied does not originate from unauthorized areas, such as: <ol style="list-style-type: none"> a. Protected Forest Area b. Industrial Forest Area c. Production Forest Area d. Conservation area <p>The implementation of FFB pricing for the period of April 2024 was verified with the records and based on these records that the pricing of FFB was in accordance with procedures and applicable regulations as well, it was transparently informed to all independent smallholders.</p>	Complied
5.1.2	<p>(C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>Based on interview with management representative i.e., public affair staff, sustainability and plasma manager obtained information that the actual prices informed directly to the CSV supplier. The company has displayed the FFB price in Mill's notice board in front of the weighbridge station, all FFB suppliers can see it and able to access the FFB price by phone. The FFB prices information also informed and explain by phone and direct message to all FFB supplier by Mill Manager. There is no dispute related to FFB payments so far.</p>	Complied
5.1.3	<p>(C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.</p>	<p>Based on interview with management representative during ASA1_3 i.e. public affair staff, sustainability and plasma manager obtained</p>	Complied

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	- Critical (Major) compliance -	information that the actual prices informed directly to the CSV supplier. The actual prices also informed in front of mill gate. There is no dispute related to FFB payments so far. Until this ASA1.3, there is no RSPO certified smallholder engage with Tanjung Selamat POM so far.	
5.1.4	(C) Evidences is available that all parties, including women and independent representative organization assisting smallholders where requested, are involved in the decision making processes and understand the contracts. These include involving finance, loans/credits, and re-payments through FFB price reductions for replanting and/or, other support mechanisms where applicable. - Critical (Major) compliance -	Until this ASA1.3, there is no RSPO certified smallholder engage with Tanjung Selamat POM so far.	Complied
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe. - Minor compliance -	There is an agreement in buying and selling FFB between FFB supplier and PT Indo Sepadan Jaya, contract number: <ul style="list-style-type: none"> • Agreement Letter No. 001/TBS/ISJ/2023 dated 1 May 2023 – FFB Supplier, between PT Indo Sepadan Jaya and Aisyah (FFB Supplier). • Agreement Letter No. 001/TBS/ISJ/2022 dated 1 May 2022 – FFB Supplier, between PT Indo Sepadan Jaya and IWH - Iwan Haryono (FFB Supplier). • Agreement Letter No. 001/TBS/ISJ/2023 dated 1 May 2023 – FFB Supplier, between PT Indo Sepadan Jaya and MBS – Marlon Brando Sibarani (FFB Supplier). • Agreement Letter No. 001/TBS/ISJ/2020 dated 1 May 2023 – FFB Supplier, between PT Indo Sepadan Jaya and WJS – Wan Juma Sari Dewi (FFB Supplier). • Agreement Letter No. 01/CSV-KTS/VIII/2017 dated 24 Augustus 2017 – FFB Supplier, between PT Indo Sepadan Jaya and Koperasi Mandiri Tani Sejahtera (FFB Supplier). 	Complied

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		<p>The contracts have explained in Article 12, Regarding Term: <i>"Perjanjian ini akan berlangsung sejak ditandatangani dan tetap mengikat para pihak sepanjang tidak diakhiri oleh para pihak"</i>.</p> <p>The agreement/contract documents between the company and the contractor is sighted such as for replanting. The contract was acknowledged by both parties and well understood. The contract contained all relevant information such as payment method, work requirements, force majeure, contract period, cancellation of contract, etc. These contract documents are jointly signed and made in duplicate and held by each party (company and supplier).</p> <p>Regarding FFB pricing, the contract is stated in Article 7; Price of FFB, states: <i>"Harga pembelian TBS dari kebun pihak kedua mengacu pada harga yang berlaku pada saat penjualan TBS kepada pihak pertama. Penetapan harga TBS oleh pihak pertama berdasarkan harga pasar dan harga TBS luar"</i>. Price changes will be informed one day before the changes, and it applicable for large size FFB (more than 8 kg). Mechanism for FFB price has been known, understood and explained to FFB suppliers</p> <p>Transparently, this agreement was made and witnessed by several stakeholders, including: Tebing Tinggi Pangkat Village Head and Labuhan Batu Office Head and 4 other witnesses consisting of (internal company and local communities). In the contract, it was affirmed related to the legality in Article 6: Rights and obligations of the Second Party, stated: <i>"Pemegang perjanjian ini harus memiliki segala bentuk perizinan yang diperlukan, baik dalam pengelolaan perkebunan kelapa sawit maupun dalam hal pelaksanaan perjanjian ini"</i>.</p>	
5.1.6	<p>(C) Agreed payments are made in a timely manner and receipts specifying price, weigh, deductions and amount paid are given.</p> <p>- Critical (Major) compliance -</p>	<p>Agreed payments are made in a timely manner and receipts specifying. The agreement/contract documents between the company and the contractor is sighted such as for replanting. The contract was acknowledged by both parties and well understood. The contract</p>	Complied

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		<p>contained all relevant information such as payment method, work requirements, force majeure, contract period, cancellation of contract, etc.</p> <p>Regarding FFB pricing, the contract is stated in Article 7; Price of FFB, states: "<i>Harga pembelian TBS dari kebun pihak kedua mengacu pada harga yang berlaku pada saat penjualan TBS kepada pihak pertama. Penetapan harga TBS oleh pihak pertama berdasarkan harga pasar dan harga TBS luar</i>". Price changes will be informed one day before the changes, and it applicable for large size FFB (more than 8 kg). Mechanism for FFB price has been known, understood and explained to FFB suppliers.</p> <p>Regarding payments for FFB purchased, this is explained in the Cooperation Agreement document in Article 9; regarding FFB payments, stated:</p> <ol style="list-style-type: none"> Payment of the price of second party FFB, will be made after accounting for the obligations of the second party installment to the first party based on this agreement. Payment as referred to in paragraph 1 (above) will be made by the first party to the second party within a period of no later than 30 (thirty) working days, after receipt of evidence and supporting documents submitted by the supplier or second party are fully received by the first party. <p>The FFB payment document can be shown at the time of the audit of ASA1.3, namely: weigh ticket, FFB payment slip (including weight vehicle number, FFB net weight, FFB price for the period, tax payment etc.).</p>	
5.1.7	<p>Weighing equipment is verified by an independent third party on a regular basis.</p> <p>- Minor compliance -</p>	<p>Calibration of the FFB weigh bridge has been carried out by <i>Balai Standardisasi Metrologi Legal Regional I Dirjen Perlindungan Konsumen dan Tertib Niaga Direktorat Metrologi Labuhan Batu</i> on 20 December 2023 and recorded of Test Result Statement No.</p>	Complied

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		004/PKTN.4.9/KHP/09/2023 for UTTP types: Bridge Scales, Trademark: Avery Weigh-Tronix; ZMS10; 190250016 with a capacity of 50,000 kg / 10 kg (valid until 1 year). This calibration is carried out at least once a year and regularly PT Indo Sepadan Jaya always calibrate the weigh bridge.	
5.1.8	The unit of certification supports Independent smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholder on who runs the Internal Controlling System (ICS), who holds the certificate, and who owns and sells certified materials. - Minor compliance -	There is no independent smallholder or any RSPO certified smallholder engage with Tanjung Selamat POM so far.	Complied
5.1.9	(C) The unit of certification has a grievance mechanism for smallholders, and all grievances raised are dealt with in a timely manner. - Critical (Major) compliance -	Company has established a mechanism to handle complaint from external party, as written in "Mekanisme Penanganan Keluhan" – complaint handling mechanism (Doc. No.SOP AA-GL- 5005-RO 01) while complaint from internal regulated under "Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan" – Employee' complaint and resolution mechanism (Doc. No.SOP-AA-HR-3008-RO 05). These mechanisms have been communicated to external parties and disseminated to PT Indo Sempadan Jaya employees. There is no change about the SOP until ASA1_3. The procedure is how to handle complaint and grievances, the company keeps confidential complainer and whistleblower. Complaint and grievance are recorded in log Book and in "Formulir Pencatatan Keluh Kesah dan Ketidakpuasan". Based on "Buku Agenda Komplain", that there is no complaint from stakeholders during period Y2023/2024.	Complied
Criteria 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			

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5.2.1	<p>The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification.</p> <p>- Minor compliance -</p>	<p>Until this ASA1_3 audit, PT ISJ has 7 smallholders who work together and are members of the CSV (Create Share Value) Program as follows:</p> <table><tr><th>Estate</th><th>Farmer Group</th><th>Area (Ha)</th></tr><tr><td rowspan="5">Tanjung Selamat</td><td>Anugrah Jaya Mandiri Sejahtera</td><td>464</td></tr><tr><td>Koperasi Mandiri Tani Sejahtera</td><td>357</td></tr><tr><td>BUMDES Sejahtera</td><td>941</td></tr><tr><td>Asosiasi WJD</td><td>1,714</td></tr><tr><td>Asosiasi KS</td><td>1,219</td></tr><tr><td>Total</td><td></td><td>4,695</td></tr></table> <p><i>Note: update January 2024</i></p> <p>The company has established a CSV coaching program for the 2023/2024 period. The realization CSV Program for period Y2023, as follow:</p> <ul style="list-style-type: none">- Fertilizer Training, carried out in February 2024.- Pest and Diseases Training, carried out in February 2024.- Harvesting and PPE, carried out in February 2024.- Riparian Buffer Zone, carried out in February 2024. <p>Based on an interview with the CSV person in charge (Mr. Hendra Jaminsa) consultation with farmers was carried out in February 2024 which was attended by 55 farmers and farmer group leaders, that there are several expectations from farmers, including:</p> <ul style="list-style-type: none">- Relatively stable FFB price- BMP coaching assistance in increasing production.- Assistance in maintaining production road access to the factory for smooth delivery of FFB to the mill.	Estate	Farmer Group	Area (Ha)	Tanjung Selamat	Anugrah Jaya Mandiri Sejahtera	464	Koperasi Mandiri Tani Sejahtera	357	BUMDES Sejahtera	941	Asosiasi WJD	1,714	Asosiasi KS	1,219	Total		4,695	Complied
Estate	Farmer Group	Area (Ha)																		
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	Asosiasi KS	1,219																		
Total		4,695																		

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		<p>Some of the farmers' hopes have been realized by PT ISJ for Y2024, including:</p> <ul style="list-style-type: none"> - Maintenance of the transport road. - Assistance of the owl cage 5 units @ IDR 1,300,000. - Install of the sign board related to the importance of PPE, fire, Best Management Practices. - Training related to the fertilizer, harvesting, and certification process. <p>In supporting the legality of smallholder land, PT ISJ has provided assistance in efforts to process the legality of farmers' land to obtain a Certificate of Ownership (SHM), until December 2023 the certificates of SHM that have been owned by farmers are as follows:</p> <ul style="list-style-type: none"> - Owned SHM: 464 Ha - Have Village Letter: 3,413 Ha - No data yet: 107 Ha. 	
5.2.2	<p>The unit of certification develops and implements livelihood improvement programmes, including at least capacity building to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder).</p> <p>- Minor compliance -</p>	<p>Based on document review and interview with CSV Department during ASA1.3, it was known that PT Indo Sepadan Jaya has collaborated with smallholders around plantations and is incorporated in the CSV (Create Share Value) Program, namely: village with a total of 13 farmer groups. In 2021 there is a program to increase the area of CSV area of 140 Ha located in SP4 and SP6.</p> <p>The Company has settled the CSV development program for the period 2023/2024, the realization of the program until December 2023 is as follows:</p> <ul style="list-style-type: none"> - Monitoring of harvest rotation. - Create pilot areas with good production categories, there are 10 plots as pilot areas with total areas 215 Ha. - Assistance of fertilizer procurement for CSV area. 	Complied

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		<ul style="list-style-type: none">- Monitoring of owl cages, actual until December 2023 is 23 units owl cages.- Farmer Training in Certification Preparation was carried out on February 2024, training material including Best Management Practices.- Mapping of smallholder area, until December 2023 have been realized 464 Ha. <p>In supporting the legality of smallholder land, PT IIS has provided assistance in the effort to process the legality of farmers' land to obtain a Freehold Certificate (SHM), until December 2023 the SHM certificates that have been owned by farmers are as follows:</p> <ul style="list-style-type: none">- Already have Certificate of SHM (Sertifikat Hak Milik): 125 Ha.- Has a Village Letter (SKT/SKGR): 782 Ha																		
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	<p>Based on document review and interview with CSV Department during ASA1.3, it was known that PT ISJ has 7 smallholders who work together and are members of the CSV (Create Share Value) Program as follows:</p> <table><tr><th>Estate</th><th>Farmer Group</th><th>Area (Ha)</th></tr><tr><td rowspan="5">Tanjung Selamat</td><td>Gapoktan Sumber Rezeki</td><td>364</td></tr><tr><td>Koperasi andiri Tani Sejahtera</td><td>357</td></tr><tr><td>BUMDES Sejahtera</td><td>941</td></tr><tr><td>Asosiasi WJD</td><td>1.714</td></tr><tr><td>Asosiasi KS</td><td>600</td></tr><tr><td>Total</td><td></td><td>3,976</td></tr></table>	Estate	Farmer Group	Area (Ha)	Tanjung Selamat	Gapoktan Sumber Rezeki	364	Koperasi andiri Tani Sejahtera	357	BUMDES Sejahtera	941	Asosiasi WJD	1.714	Asosiasi KS	600	Total		3,976	Complied
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		<p>The Company has settled the CSV development program for the period 2023/2024, the realization of the program until December 2023 is as follows:</p> <ul style="list-style-type: none"> - Monitoring of harvest rotation. - Create pilot areas with good production categories, there are 10 plots as pilot areas with total areas 215 Ha. - Assistance of fertilizer procurement for CSV area. - Monitoring of owl cages, actual until December 2023 is 23 units owl cages. - Farmer Training in Certification Preparation was carried out on February 2024, training material including Best Management Practices. - Mapping of smallholder area, until December 2023 have been realized 464 Ha. <p>In supporting the legality of smallholder land, PT IIS has provided assistance in the effort to process the legality of farmers' land to obtain a Freehold Certificate (SHM), until December 2023 the SHM certificates that have been owned by farmers are as follows:</p> <ul style="list-style-type: none"> - Already have Certificate of SHM (Sertifikat Hak Milik): 125 Ha. <p>Has a Village Letter (SKT/SKGR): 782 Ha</p>	
5.2.4	<p>(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.</p> <ul style="list-style-type: none"> - Critical (Major) compliance - 	<p>The PT ISJ CSV team has provided guidance to smallholder farmers by conducting several training activities, including pesticides handling that was carried out in February 2024. Training including fertilizer, pest and disease, weed control and OHS.</p>	Complied
5.2.5	<p>The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.</p> <ul style="list-style-type: none"> - Minor compliance - 	<p>The CSV Program Achievement Report up to December 2023 has been reported in the Tanjung Selamat plantation annual report and the report has been reviewed in January 2024 which will then be used as a CSV program in 2024. This report can be access by public.</p>	Complied

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		<p>Based on the results of the 2023/2024 CSV report review, the results are as follows:</p> <ul style="list-style-type: none"> - Based on the progress report on the achievement of the CSV program for the 2023 period, the area of the CSV program has reached 3,976 hectares, there is no changes of areas. - Road maintenance will be improved for period Y2023. <p>Procurement of fertilizer will be continued.</p>	
Principle 6: respect workers' rights and conditions Protect workers' rights and ensure safe and decent working conditions.			
Criteria 6.1: Any form of discrimination is prohibited.			
6.1.1	<p>(C) A publicity available non-discrimination and equal opportunity policy is implemented in such way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.</p> <p>- Critical (Major) compliance -</p>	<p>Equal Opportunity policy is stated in "Kebijakan Perusahaan", updated 01st December 2019. Stated in Point 13 "<i>Menghormati hak asasi manusia dengan memperlakukan seluruh karyawan secara adil, baik dalam hal penerimaan, penilaian, kondisi dan lingkungan kerja, serta keterwakilan tanpa memandang suku, kasta, asal negara, agama/kepercayaan, cacat, gender, orientasi seksual, keanggotaan serikat pekerja, afiliasi politik dan/atau umur</i>" - Respect human rights by treating all employees fairly, both in terms of acceptance, assessment, working conditions and environment, and representation regardless of ethnicity, caste, national origin, religion/belief, disability, gender, sexual orientation, union membership, affiliation politics and/or age.</p> <p>This policy has been informed to all employees (latest socialization on 09 February 2024) and being placed into noticed board in public area and easily accessed.</p> <p>Company also has SOP about the new employment recruitment. According on SOP: AA-HR-305.2-R0 dated 1 February 2009 about "Penerimaan Karyawan Baru" (Recruitment and Selection of Employee), the company will accept new employee based on their capabilities and qualifications. This policy has been communicated to worker. The policy</p>	Complied

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		<p>describe the organization recognize and respect to the rights of local, migrant or urban worker.</p> <p>Worker register for mill and estates mentioned that all workers came from different backgrounds (race, religion, gender, etc). Ethnical diversity of worker and during interview with workers, no discrimination was identified based on religion, ethnic, gender. No evidence of discrimination found during the audit. Company provided working tools to the workers, relevant to the nature of the work performed.</p> <p>According to data of employees distribution, employee composition is consists of several religions, ethnicities and races. During interview with workers and labor union at ASA1.3 was confirmed that there is no discrimination issue occur.</p> <p>This employee list proves that the company does not practice any form of discrimination, employees are given the opportunity to work regardless of ethnicity, religion, origin, and gender.</p>	
6.1.2	<p>(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against. Evidence includes migrant workers non-payment of recruitment fees.</p> <p>- Critical (Major) compliance -</p>	<p>Worker register for mill and estates mentioned that all workers came from different backgrounds (race, religion, gender, etc). Ethnical diversity of worker and during interview with workers, no discrimination was identified based on religion, ethnic, gender. No evidence of discrimination found during the audit.</p> <p>Company provided working tools to the workers, relevant to the nature of the work performed.</p> <p>During interview with workers and Labor union at ASA1.3 confirmed that there is no discrimination occurs in PT Indo Sepadan Jaya and PT Rantau Sinar Karsa.</p>	Complied
6.1.3	<p>The unit of certification demonstrates that the recruitment selection, hiring access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p> <p>- Minor compliance -</p>	<p>Company has a SOP related to new employment recruitment. According on SOP Rekrutment dan Seleksi Karyawan No. SOP: AA-HR-305.2-R0 dated 1 February 2009 regarding "<i>Penerimaan Karyawan Baru</i>" (Recruitment and Selection of Employee), the company will accept new</p>	Complied

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		<p>employee based on their capabilities and qualifications. This procedure were communicated to all employees in the workplace and stakeholders as well on 09 February 2024.</p> <p>There are two types of employees that are applied in PT ISJ and PT RSK, which are permanent employees (known as SKU-B and SKU-H) and daily workers (known as BHL/PHL). Worker register for mill and estates mentioned that all workers came from different backgrounds (race, religion, gender, etc). Ethnical diversity of worker and during interview with workers, no discrimination was identified based on religion, ethnic, gender. No evidence of discrimination found during the audit.</p> <p>Permanent Employee (SKU-H and SKU-B) is confirmed under the joint work Agreement (PKB), while the Daily worker with the daily work agreement with a minimum validity period of 1 year.</p> <p>Based on interview with the HR Dept., that recruitment of employees is based on an analysis of workforce needs and within it has considered, the required competencies, experience and expertise required. For this reason, employee acceptance tests and interviews will be conducted. Employee assessments are always carried out every 6 months as a basis for being able to promote positions or levels/groups which will affect to the monthly salary.</p> <p>Sample taken for recruitment process/promotion process at Tanjung Selamat Mill on period 2023 and promotion of permanent employee of Tanjung Selamat Estate:</p> <ol style="list-style-type: none"> 1. Employee promotion, based on Internal Memorandum of HR Ops. Plantation 1 No. 576/HR-RO1/MEMO/12/2023 dated 1 December 2023, on behalf of Putra Anugrah (Tanjung Selamat POM), promote to starts from 1 December 2023. 2. Employee promotion, based on Internal Memorandum of HR Ops. Plantation 1 No. 575/HR-RO1/MEMO/12/2023 dated 1 December 2023, on behalf of Frans Herman Simamora (Tanjung Selamat POM), 	
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		<p>promote to starts from 1 December 2023.</p> <p>3. Employee promotion, based on Internal Memorandum of HR Ops. Plantation 1 No. 531/HR-RO1/MEMO/12/2023 dated 1 December 2023, on behalf of Gunawan (Pangkatan Estate), promote to starts from 1 December 2023.</p> <p>4. Employee promotion, based on Internal Memorandum of HR Ops. Plantation 1 No. 532/HR-RO1/MEMO/12/2023 dated 1 December 2023, on behalf of Maruli Marbun (Pangkatan Estate), promote to starts from 1 December 2023.</p> <p>5. Employee promotion, based on Internal Memorandum of HR Ops. Plantation 1 No. 533/HR-RO1/MEMO/12/2023 dated 1 December 2023, on behalf of Epenetus Silitonga (Pangkatan Estate), promote to starts from 1 December 2023.</p> <p>6. Employee promotion, based on Internal Memorandum of HR Ops. Plantation 1 No. 534/HR-RO1/MEMO/12/2023 dated 1 December 2023, on behalf of Rati Ningsih (Pangkatan Estate), promote to starts from 1 December 2023.</p> <p>7. Employee promotion, based on Internal Memorandum of HR Ops. Plantation 1 No. 535/HR-RO1/MEMO/12/2023 dated 1 December 2023, on behalf of Gutrianto Lase (Pangkatan Estate), promote to starts from 1 December 2023.</p> <p>8. Employee promotion, based on Internal Memorandum of HR Ops. Plantation 1 No. 558/HR-RO1/MEMO/12/2023 dated 1 December 2023, on behalf of Rifki Wardana (Tanjung Selamat Estate), promote to starts from 1 December 2023.</p> <p>9. Employee promotion, based on Internal Memorandum of HR Ops. Plantation 1 No. 559/HR-RO1/MEMO/12/2023 dated 1 December 2023, on behalf of Irman (Tanjung Selamat Estate), promote to starts from 1 December 2023.</p> <p>10. Employee promotion, based on Internal Memorandum of HR Ops.</p>	
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		Plantation 1 No. 560/HR-RO1/MEMO/12/2023 dated 1 December 2023, on behalf of Rian Agustiawan (Tanjung Selamat Estate), promote to starts from 1 December 2023.	
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>- Minor compliance -</p>	<p>As it is found in company policy that's signed by Managing Director (Mr. Kelvin Tio) on 1st December 2019 at point 15 of the policies stated that: "prevent sexual harassment and various forms of violence against women and protect their reproductive rights".</p> <p>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>Based on interview with Gender Committee during ASA1.3, company has implemented the protection of women reproductive rights, in form of maternal leave, period leave, and regular pregnancy check for female sprayers and strictly prohibit pregnant and/or breastfeeding female worker applying pesticides. The latest pregnancy checks in April 2024; The result of pregnancy test is "negative".</p> <p>When in pregnancy checking there are confluence workers who stated "positive", then based on the company's policy above, the woman workers to be transferred to other work which not related to chemistry (spray or fertilizing).</p>	Complied
6.1.5	<p>(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>- Critical (Major) compliance -</p>	<p>The company has formed a Gender Committee at Tanjung Selamat Estate and Mill. During this audit there is no changing of Gender Committee structure which is chaired by Romasi Banjarnahor and Ms. Ratna Dewi Ginting as a secretary, based on the Gender Committee Organizational Structure as of 26 August 2014. Coordinators are assigned at each Afdiling; Afdeling 1: Ms. Katarina Hutasoit, Afdeling 2: Ms. Misnawati, Afdeling 3: Ms. Find Dahlia Manurung and Afdeling 4: sdri. Ratih Pratiwi and membership are all female workers in PT ISJ and SSR.</p> <p>In 2024 Gender Committee Work Program has been established</p>	Complied

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		<p>including to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women and issues that will be discussed at the meeting, including:</p> <ul style="list-style-type: none"> - Receive female employee complaint. - Accepting all Defending and guaranteeing the rights of women workers. - Carry out routine immunization of children to mothers who have toddlers. - Conduct family health education with environmental cleanliness. <p>The regular monthly gender committee meeting was held on 08 November 2023 which discussed refreshment the committee gender work programme; meeting dated 07 October 2023 discussing awareness to women workers, occupational health and safety, family healthcare. Based on the records of the routine meeting and interviews with management, that during the period 2023/2024 there is no cases related to gender issues.</p>	
6.1.6	<p>There is evidence of equal pay for the same work scope.</p> <p>- Minor compliance -</p>	<p>Based on the results of document review and interviews with worker representatives, it is known that the company has implemented the same wages for each scope of work. Even if there are differences, this is more due to the wage scale structure which considers length of service and employee class.</p> <p>Record of payment (April 2024)</p> <ul style="list-style-type: none"> • NIK 1536 (Harvester): Basic salary Idr 3,192,000 • NIK 1561 (Harvester): Basic salary Idr 3,192,000 <p>The wage reference used is the Governor's Decree Number 188.44/998/KPTS/2023 dated November 30, 2023, which states that the</p>	Complied

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		UMK for Labuhan Batu Regency is IDR 3,228,339. The wage components provided by the company are in the form of a basic salary and fixed allowances in the form of money in kind so that they meet the minimum wage requirements.							
Criteria 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).									
6.2.1	(C) Documentation of pay and working conditions in accordance with applicable labour laws are available to the workers in national languages and explained to them in language they understand. - Critical (Major) compliance -	<p>The wage reference used is the Governor's Decree Number 188.44/998/KPTS/2023 dated 30 November 2023, which states that the minimum wage for Labuhan Batu Regency is IDR 3,228,339. The wage components provided by the company are in the form of a basic salary and fixed allowances in the form of natura so that they meet the minimum wage requirements.</p> <p>Record of payslip</p> <table><tr><td>Period: April ID: 1561 Basic salary: IDR 3,192,000 Harvesting premium: IDR 323,374 Manual premium: IDR 28,475 Rice allowance: IDR 597,525 BPJS: IDR 353,206</td><td>Deduction: BPJS:IDR 487,637 Rice allowance: IDR597,525 Debt: IDR 105,000 Cooperative: IDR 12,000 Union: IDR 31,000</td></tr><tr><td colspan="2">Gross: IDR 3,304,418</td></tr><tr><td colspan="2">Nett income: IDR 3,157,289</td></tr></table> <p>.</p>	Period: April ID: 1561 Basic salary: IDR 3,192,000 Harvesting premium: IDR 323,374 Manual premium: IDR 28,475 Rice allowance: IDR 597,525 BPJS: IDR 353,206	Deduction: BPJS:IDR 487,637 Rice allowance: IDR597,525 Debt: IDR 105,000 Cooperative: IDR 12,000 Union: IDR 31,000	Gross: IDR 3,304,418		Nett income: IDR 3,157,289		Complied
Period: April ID: 1561 Basic salary: IDR 3,192,000 Harvesting premium: IDR 323,374 Manual premium: IDR 28,475 Rice allowance: IDR 597,525 BPJS: IDR 353,206	Deduction: BPJS:IDR 487,637 Rice allowance: IDR597,525 Debt: IDR 105,000 Cooperative: IDR 12,000 Union: IDR 31,000								
Gross: IDR 3,304,418									
Nett income: IDR 3,157,289									
6.2.2	(C) Employment contracts and related documents detailing payments and	Every worker has an employment relationship with the company, for example shown by	Complied						

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	<p>conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed.</p> <p>- Critical (Major) compliance -</p>	<ul style="list-style-type: none"> Daily Casual Work Agreement Number 214/PKH/KPT/04/2024 dated March 19, 2024 for Ediyanus Zebua as a harvester Daily Casual Work Agreement Number 213/PKH/KPT/04/2024 dated March 19, 2024 for Hengki Situmorang as a harvester <p>Apart from that, there are also collective labour agreement period 2022 – 2024 which explain explains the provisions of employment including recruitment and transfer of workers, working hours, wages, overtime, social security and social assistance, PPE, pension, type of work, termination of employment, separation, company and worker obligations, ways of resolving labour disputes, transitional provisions, and other terms of employment.</p> <p>In this assessment The collective work agreement is still in the process of being ratified. The results of interviews with representatives of the labor office and the results of document reviews show that currently the PKB/CLA refers to the previous period or to the BKS-PPS</p>	
6.2.3	<p>(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, and other legal labour requirements.</p> <p>- Critical (Major) compliance -</p>	<p>Company has been shown evidence that comply with labour requirement i.e :</p> <p>Regular working hour</p> <p>As stated in CLA and interview with worker representative working hour is 7 hours in a day for 6 days. No issue regarding regular working hour both from worker or labour union. During working hours, you are also given a break of 1 hour</p> <p>Overtime</p> <p>State in company regulation period of 2022 – 2024 which, among other things, regulates overtime working hours in the company.</p>	Complied

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		<p>The company can show implementation of overtime which is in accordance with the regulations for example ID : 2007 with total of overtime payment Idr 1,580,411. Overtime orders, details of overtime pay, and details of day-by-day overtime hours can be shown.</p> <p>Implementation of entitlement holiday Described in CLA for the period 2022 - 2024 explain related leave, permission to leave the company, and holidays.</p> <p>Maternity and Menstrual Leave Described in CLA for the period 2022 – 2024. Maternity leave (H-2) is given 90 days which divide 45 days before and 45 days after birth. While menstrual leave given if on the first day of the menstrual period the worker feel not well.</p> <p>As a result of interviews with employee representatives and labour union representatives, it was found that the company had implemented policies regarding employment properly referring to applicable regulations.</p>	
6.2.4	<p>(C) The unit of certification provides adequate housing. Sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	<p>Based on the results of field visits to employee housing, several things were found as follows:</p> <ul style="list-style-type: none"> • Solid domestic waste whose management is not yet optimal, such as disposal at the back of the house, ditches, or other areas even though the company has provided temporary shelter (KTS, KPT, PTS) • Landfill distance < 1 Km and there is solid domestic waste disposed of in the water well employee home area (PTS) 	Non-compliance

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		<ul style="list-style-type: none"> • Drainage conditions that have not been managed properly so there are air reservoirs (KTS, KPT, PTS) • There is a broken waste disposal pipe so that household waste water flood in the area behind the house (KPT & PTS) <p>Minister of Health Regulation No. 2 of 2023 concerning Government Implementing Regulations Number 66 of 2014 concerning Environmental Health, which explains:</p> <ul style="list-style-type: none"> • Health requirements for water as intended in paragraph (1) consist of: <ul style="list-style-type: none"> - The water is protected from sources of pollution, disease-carrying animals and vector development areas - safe from possible contamination • Efforts to protect Public Health are carried out to create a healthy environment that is free from elements that cause health problems in the form of waste that is not managed in accordance with requirements <p>Furthermore, PP 81 of 2012 states that the distance of the landfill from emplacement is at least 1 km</p> <p>Nonconformity:</p> <ol style="list-style-type: none"> 1. The company has not been able to show sufficient evidence that it has provided an adequate housing environment and sanitation facilities in accordance with national standards or higher 2. The company has not been able to show sufficient evidence that it has protected water sources for employees from potential pollution 	
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6.2.5	The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food. - Minor compliance -	Based on the results of field visits and interviews with employee representatives at the housing complexes, it is known that employees can easily access basic needs because apart from sellers entering the housing area, there are also stalls in the employee housing area.	Complied
6.2.6	A DLW is paid to all workers in accordance with applicable regulations, including workers who work on a piece rate/quota basis, the calculation of which is based on a quota that can be achieved during regular working hours. - Minor compliance -	<p>Until now, the DLW benchmark for Indonesia has not been determined, so companies calculate the prevailing wage by referring to the guidelines issued by the RSPO as follows :</p> <ul style="list-style-type: none"> - Housing : IDR 255,430 - Electricity and water: IDR 248,717 - Education: IDR 68,129 - Daycare: IDR 13,027 - Healthcare: IDR 407 - Food: IDR 54,801 - Sport: IDR 3,432 - Lowest Basic salary: IDR 3.192,000 <p>Total prevailing wage : IDR 3,835,313</p>	Complied

PROCEDURAL NOTE:

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

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

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

Once the DLW benchmark is available, this procedural note is no longer applicable.

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6.2.7	<p>Permanent fulltime employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.</p> <p>- Minor compliance -</p>	<p>Until this assessment, there are still contract workers for harvesting and processing activities at the mill. The results of interviews with representatives of the Labuhan Batu Regency Manpower Office revealed that the Company has created a gradual employee recruitment program for 2022 - 2024 so that by the end of 2024 all main work has been carried out by permanent employees.</p> <p>Document verification found information on employee recruitment progress as follows</p> <ul style="list-style-type: none"> • Promotion of employees during the period 2022 - 2024 for 63 harvesting daily worker who have been approved by the manager of PT RSK and have been acknowledged by the Head of the Labuhan Batu Regency Manpower Office • Promotion of employees during the period 2022 - 2024 for 83 harvesting daily worker who have been approved by the manager of PT ISJ and have been acknowledged by the Head of the Labuhan Batu Regency Manpower Office • Appointment of daily worker of the Tanjung Selamat mill for the period 2022 - 2024 for 5 employees who have been approved by the Factory manager and have been acknowledged by the Head of the Labuhan Batu Regency Manpower Office 	Complied
<p>Criteria 6.3: The unit of certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			
6.3.1	<p>(C) A published statement recognizing freedom of association and right to collective bargaining in national languages is available and is explained to all workers in languages that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	<p>Freedom of association and right to collective bargaining policy stated in "Kebijakan Perusahaan", updated 01st December 2019. Stated in Point 16 "<i>Menghormati hak setiap karyawan untuk membentuk atau menjadi anggot serikat pekerja sesuai dengan keinginannya dan untuk melakukan tawar-menawar secara kolektif</i>" - Respect the right of every</p>	Complied

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		<p>employee to form or join trade unions of his choice and to bargain collectively. The policy is written in Bahasa Indonesia, this policy has been informed and communicated to all employees and being placed into public area easily accessed.</p> <p>Workers of PT Indo Sepadan Jaya (Tanjung Selamat and Pangkatan Estate) has established a Labor Union in accordance with the Decision Letter of PD FSPPP - SPSI of North Sumatra No. Kep-24/ORG/PC FSPPP-LBR/IX/2019, dated 3 September 2019 regarding "Pengukuhan Pengurus Unit Kerja Serikat Pekerja Pertanian dan Perkebunan – Serikat Pekerja Seluruh Indonesia (PUK SP.PP-SPSI) PT Indo Sepadan Jaya Kebun Tanjung Selamat Kec. Kampung Rakyat, Kabupaten Labuhanbatu Selatan Masa Bakti 2019-2024", and has been registered with the Manpower Office of Labuhanbatu Regency. 26/DTK-VIII/ 2001 dated August 30, 2001 Chaired by Josmart Tamba and Saymsul Saragih as secretarist. There is no changes related to the worker union of Tanjung Selamat Estate & Mill until this ASA1.3.</p> <p>Worker union in PT Rantau Sinar Karsa has formed according to "Surat Keputusan PC FSP.PP-SPSI Wilayah Kabupaten Labura No. Kep 22/ORG/PC FSPPP-LBR/VII/2019, dated 8 July 2019 regarding "Pengukuhan Pengurus Unit Kerja PUK SP.PP-SPSI PT Rantau Sinar Karsa Kec. Pangkatan, Kab. Labuhan Batu periode 2019-2024". Worker union has been registered in Dinas Tenaga Kerja Kabupaten Labuhan Batu No. 26/DTK-VIII/2001 since dated 30 August 2001. There is no changes related to the worker union of Pangkatan Estate until this ASA1.3.</p> <p>Worker Union always conducts communication and consulting with management to discuss the employment issue.</p>	
6.3.2	Minutes of meetings between the unit of certification with trade unions or worker representatives who are freely elected, are documented in the national languages and available upon request.	Worker Union always conducts communication and consulting with management, some meetings with management. Sample taken of record of meeting between company and labour union is conducted	Complied

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	- Minor compliance -	regularly, e.g.: 1. On 8 July 2023, Meeting between Management PT Indo Sepadan Jaya and PUK FSPP-SPSI PT Indo Sepadan Jaya to discuss about refresh of to discipline of fingerprint, prohibition of alcohol drink. 2. On 07 October 2023, the meeting was discussed related the maintenance and repairing the workers housing facility. Since lates audit until audit ASA 1.3 conducted there is no issue related to workers and industrial relationship.	
6.3.3	Management does not interfere with the formation or operation of registered labour organizations/unions, or other freely elected representatives for all workers, including migrant and contract workers. - Minor compliance -	The union has 385 members, consisting of: Pangkatan Estate (PT RSK): 166 workers, PT ISJ: Tanjung Selamat Mill: 74 members, Tanjung Selamat Estate: 241 members. There is no changes of member of union workers until this ASA1.3. Based on interviews with the head workers' unions of the Tanjung Selamat Estate and Pangkatan Estate, the management of PT ISJ and PT RSK did not intervene and influence the organizational structure in terms of establishing the organizational structure. Trade unions can freely recruit their members and as a sign of membership, the union also provides its membership card.	Complied
Criteria 6.4: Children are not employed or exploited.			
6.4.1	A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements. - Minor compliance -	Until this assessment there have been no changes related to the company's policy on child labour; A formal policy for the protection of children, including prohibition of child labour and remediation are available in "Kebijakan Perusahaan" signed by Managing Director on 1st December 2019. In the policy stated that Company are prohibited to employ the child in the company operation. Child employee is under age 18th years old according to UU No. 13 Tahun 2003.	Complied

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		This policy also apply in every agreement letter with supplier or third party as described in 2.2.3	
6.4.2	<p>(C) Documented evidence on the fulfilment of worker's minimum age requirements in accordance with applicable regulation and verification procedures for age requirements, are available.</p> <p>- Critical (Major) compliance -</p>	<p>Evidence of Child Labour has been implemented shown with following detail:</p> <ul style="list-style-type: none"> - The job requirements state that the minimum age applicants is 18 years. - Results of employee document verification for the April 2024 update revealed that there were no employees who started working for the first time with the company under the age of 18 - Based on a sampling of work agreement letters, it is known that there were no workers under the age of 18 when they first started working at the company - Interview with worker representative they have known about child labour policy - Interview with Labour Agency of Labuhan batu District there is no issue related Child Labour in the company 	Complied
6.4.3	<p>(C) Young person maybe employed only for non-hazardous work with protective restrictions in place for that work.</p> <p>- Critical (Major) compliance -</p>	<p>Since the Company Policy was established in December 2019 until this ASA1.3 audit, there have been no changes., i.e. company's policy on child labour; A formal policy for the protection of children, including prohibition of child labour and remediation are available in "<i>Kebijakan Perusahaan</i>" signed by Managing Director on 1st December 2019. In the policy stated that Company are prohibited to employ the child in the company operation. Child employee are under age 18th years old according to UU No. 13 Tahun 2003. Related to the the protection of children, including prohibition of child labour and remediation, its stated in Company Regulation: [14]; Prohibiting children from working in any company activities.</p> <p>Verification has also been carried out on the work contract documents with third parties and also the supplier contract documents including</p>	Complied

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		<p>TBS suppliers. It is stated in writing in the article of the agreement document related to the prohibition of employing children (under the age of 18), see 2.2.2 above.</p> <p>Based on verification of the Employee Master document for the period of June 2024, the ages of the youngest workers were identified when recruited, there is no young person which work with the company. Minimum age for worker are 18 years old.</p>	
6.4.4	<p>The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.</p> <p>- Minor compliance -</p>	<p>No child labour policy has been socialized to internal and external stakeholder for example:</p> <ul style="list-style-type: none"> - 06 February 2024 to all resident in Tanjung Selamat Estate and Mill - 23 February 2024 to all worker in Pangkatan Estate (Include for the contractor) <p>Interview result with related stakeholder for example village representative and agencies representative known all of company policy has been socialized at least once a year. Field observation result to the company activities for example upkeep, manuring, pesticide application, mill processing, and others there is no child labour found. Workers and supervisor also have good knowledge related prohibition of child labour as described in this policy.</p>	Complied
Criteria 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	<p>(C) A policy to prevent sexual and all other form of harassment and violence is documented, implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>A policy to prevent sexual and all other form of harassment and violence are available in "Kebijakan Perusahaan" signed by Managing Director on 1 st December 2019. In the policy point 15 stated that "<i>Mencegah pelecehan seksual dan berbagai bentuk kekerasan terhadap perempuan serta melindungi hak-hak reproduksinya</i>". The policy is written in Bahasa Indonesia, this policy has been informed and communicated to all employees and being placed into public area easily accessed. The policy has been communicated to all level workforce, sample seen socialization</p>	Complied

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		to workers of Tanjung Selamat Estate on 06 February 2024 and Pangkatan Estate on 23 February 2024. Socialization to workers also conducted through muster morning and banner/poster available in Afdeling/Mill Office.	
6.5.2	<p>(C) A policy to protect the reproductive rights of all, especially of women, is documented, implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>A policy to prevent sexual and all other form of harassment and violence are available in "Kebijakan Perusahaan" signed by Managing Director on 1 st December 2019. In the policy point 15 stated that "<i>Mencegah pelecehan seksual dan berbagai bentuk kekerasan terhadap perempuan serta melindungi hak-hak reproduksinya</i>". The policy is written in Bahasa Indonesia, this policy has been informed and communicated to all employees and being placed into public area easily accessed. The policy has been communicated to all level workforce, sample seen socialization to workers of Tanjung Selamat Estate on 06 February 2024 and Pangkatan Estate on 23 February 2024. Socialization to workers also conducted through muster morning and banner/poster available in Afdeling/Mill Office.</p> <p>Implementation of policy for example:</p> <ul style="list-style-type: none"> - Menstrual and maternity leave - Pregnancy test for ensure no pregnant or breastfeeding mom work with agrochemical. - Annual and semester medical checkup 	Complied
6.5.3	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified in accordance with applicable regulations in Indonesia.</p> <p>- Minor compliance -</p>	<p>Interview result with gender committee known that the Unit of Certification has assessed needs of new mother with method direct interview. The facilities provided by the company to mothers who have just given birth include daycare, health checks through <i>posyandu</i> and consultations at clinics as well as time to provide breast milk for babies. Apart from that, an assessment was also carried out regarding access to obtain baby needs such as fertilizer, formula milk and personal care.</p>	Complied

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6.5.4	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, as long as the complaint is supported with adequate information, is documented, implemented and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p>	<p>Company has establish Standard Operating Procedure, No. SOP: XX-HR-308.5-RO; Revision: 0, December 11th 2009: Employees complaints: submission and settlement. Mechanism for complaints management where it needs to protect its confidentiality for complaint submitter was found in company policy's as in one of points of this policies stated that: "To provide appropriate information for those who inquiry it and to protect its confidentiality for whistle blower cases in accordance to law regarding environmental and social issue, food safety, health and safety work, so that it enables them to more participate to the decision making processes for improving company's performance". Record of complaint/specific grievance has demonstrated under "Buku Keluhan Karyawan". The company has resolved all complains according to the procedure.</p> <p>Based on interviews with representatives of worker unions and representatives of the Labuhan Batu Regency Manpower Office, over the past year there have been complaints from employees regarding the process of appointment from contract workers to permanent employees. With this, several internal mediations have been held with the labor union and on June 16, 2022, a gradual employee appointment program was agreed upon.</p> <p>At the time this assessment was carried out, there was progress in the appointment of contract/Daily worker employees to permanent employees with the following summary:</p> <ul style="list-style-type: none"> Promotion of employees during the period 2022 - 2024 for 63 harvesting daily worker who have been approved by the manager of PT RSK and have been acknowledged by the Head of the Labuhan Batu Regency Manpower Office 	Complied
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		<ul style="list-style-type: none"> Promotion of employees during the period 2022 - 2024 for 83 harvesting daily worker who have been approved by the manager of PT ISJ and have been acknowledged by the Head of the Labuhan Batu Regency Manpower Office Appointment of daily worker of the Tanjung Selamat mill for the period 2022 - 2024 for 5 employees who have been approved by the Factory manager and have been acknowledged by the Head of the Labuhan Batu Regency Manpower Office <p>In 2024 the program will be completed, and each main job will be carried out directly by permanent employees. The labour department and the worker union said that to date the company is still adhering to the commitments it has made. Based on the description above, it can be concluded that the company has facilitated the resolution of existing complaints and grievances in accordance with the procedures, timeframes determined, and conveyed to the parties.</p>	
Criteria 6.6: No forms of forced or trafficked labour are used.			
6.6.1	(C) All work is voluntary and the following are prohibited: <ul style="list-style-type: none"> Retention of identity documents or passports; Payment of recruitment fees; Contract substitution without worker's consent Involuntary overtime; Lack of freedom of workers to resign Penalty for termination of employment, unless the unit of certification and the workers agree to the penalty and it is stated in the employment agreement Debt bondage Withholding of wages 	<p>All workers who work in the PT ISJ and PT RSK based on an agreement between both parties. The company also has a commitment to fostering basic working relationships as can be seen in several documentation as follows:</p> <ul style="list-style-type: none"> There are established procedures and policies relating to employment There is worker agreement which has been agreed by both parties. There is a Company Regulation period 2022 – 2024 which has been approved by Labour Agencies of Labuhan Batu district. <p>Interview result of worker representative there is no issue related to Retention of identity documents or passports; Payment of recruitment</p>	Complied

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	- Critical (Major) compliance -	fees; Contract substitution without worker's consent; Involuntary overtime; Lack of freedom of workers to resign; Penalty for termination of employment, unless the unit of certification and the workers agree to the penalty and it is stated in the employment agreement; Debt bondage; Withholding of wages. For the forms of forced or trafficked labour above as explained in the "Perjanjian Kerja Bersama" / PKB/ CLA. Based on the CLA, employee rights and obligations are regulated where the points referred to do not occur. Supported by the results of worker interviews where all workers have signed contracts that clearly state the type of work, wages, length of service and work sanctions. Company has implemented HR management in accordance with regulations.	
6.6.2	<p>(C) Where temporary (Specified Time Work Agreement/PKWT) or migrant workers are employed, a specific labour policy and procedures are established and evidence of implementation is available.</p> <p>- Critical (Major) compliance -</p>	<p>During audit it was confirmed that, there is no migrant workers in PT Indo Sepadan Jaya – Tanjung Selamat POM and supply bases.</p> <p>For permanent workers, term and condition Company has agreement in CLA / "Perjanjian Kerja Bersama" which contain term and condition for workers. For casual workers contract available in "<i>Perjanjian Kerja Harian Lepas</i>".</p> <p>Auditor also has verified the employee master updated May 2024 and interview to the workers and HR Department revealed that there is no migrant worker at Tanjung Selamat Estate & POM and Pangkatan Estate.</p> <p>Regulations on employment for contract employees are stated in every employment agreement made. The employment agreement regulates wages, job descriptions, responsibilities, sanctions, and the end of the period.</p>	Complied
Criteria 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.			
6.7.1	(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers.	PT Indo Sepadan Jaya - Tanjung Selamat POM and Estate has appointed the responsible person) for H&S is identified as per P2K3 (Safety	Complied

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	<p>Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p>Committee Meeting). P2K3 has an approval from Manpower and Transmigration Office.</p> <p>Data verified:</p> <ul style="list-style-type: none"> OHS committee has an endorsement/approval from Manpower Office Sumatera Utara Province according to "Surat Keputusan Kepala UPT Pengawasan Ketenagakerjaan Wilayah IV Dinas Tenaga Kerja Provinsi Sumatera Utara Nomor: KEP.162-7/P2K3/WIL-IV/DTK/SU/2023 tentang Pengesahan Panitia Pembina Keselamatan dan Kesehatan Kerja (P2K3) di Perusahaan" dated 22 May 2023. Head of P2K3 was Mill Manager Maruli Tua Sihombing. Safety Officer or "Ahli K3 Umum" OSH expert was assigned as P2K3 secretary. Safety Officer on behalf Fahreza Hafiz has a license from Ministry of Manpower with decree letter Nomor 5/17418/AS.02.04/XII/2021 dated 29 December 2021 Tentang Penunjukan Ahli K3 umum, valid until 29 December 2024. Safety Officer on behalf Karten Malau has a license from Ministry of Manpower with licence number No. Reg. 47023/PK3/AJ/12/2021/P1 dated 30 September 2021 valid until 30 September 2024. Monthly OHS Committee meeting, to discuss and address current OHS issues. Last meeting on 8th April 2024 <p>Report of OHS performance (three months basis) as per document of "Laporan Triwulan P2K3" period I – year 2024, - has been submitted to Dinas Ketenagakerjaan Kabuapten Labuhanbatu.</p>	
6.7.2	<p>Accident and emergency procedures in Indonesian language are in place and clearly understood by all workers. Assigned operatives trained in first aid are present in both field and other operations. First aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>PT Indo Sepadan Jaya – Tanjung Selamat POM has defined the procedure related to accident and emergency procedure in local language Bahasa Indonesia, such as:</p> <ul style="list-style-type: none"> Accident and emergency procedures – operation control: AA-EMS-446-PR Emergency preparedness procedure: AA-EMS-447-PR Emergency plan procedure: AA-EMS-001-FM 	Complied

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		<ul style="list-style-type: none">• Emergency incident procedure: AA-EMS-003-FM• Emergency incident reporting procedure: AA-EMS-004-FM <p>According to the emergency procedure, the emergency conditions have been identified including Fire and explosion at buildings; land fire; earthquake; flooding; chemical spill and poisonings also waste water ponds spillage.</p> <p>The procedures described the roles and responsibilities of each emergency response team include the mechanism how to conduct medical evacuation to near hospital/local health Centre, the emergency contact number of each internal emergency team and external related parties such as public fire station at local area Kabupaten Labuhan Batu and Public health Centre were also available.</p> <p>PT Indo Sepadan Jaya – Tanjung Selamat POM has formed the emergency response team as per “Struktur Organisasi Tanggap Darurat” updated year 2024.</p> <p>Emergency response team has conducted the regular training to response the emergency, sample seen:</p> <ul style="list-style-type: none">• Record on emergency response drill, dated 14th November 2023. In 2024 will be planned in November 2024.• OHS inspection reported under document – sample seen dated 25 April 2024. The result: there was found the AP boots was broken (2 harvester). The follow up: change the AP boots.• Refreshment training on accidents investigation training, conducted on 17 March 2024 that was attended by 32 workers. <p>Refreshment on training for first aiders, conducted on 16th February 2024 that was attended by 23 workers.</p>	
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6.7.3	<p>(C) Workers use appropriate personal protective equipment (PPE) which is provided free of charge to all workers in the workplace, to cover all potentially hazardous operations, such as pesticides application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p>	<p>PT Indo Sepadan Jaya – Tanjung Selamat POM has demonstrated the record of realization the OHS program 2023 - 2024 including use appropriate personal protective equipment (PPE) which is provided free of charge to all workers in the workplace, to cover all potentially hazardous operations, such as pesticides application, machine operations, land preparation, and harvesting.</p> <p>Sample record on implementation OHS program year 2024:</p> <ul style="list-style-type: none"> • Monthly OHS Committee meeting, to discuss and address current OHS issues. Last meeting on 8th April 2024 • Report of OHS performance (three months basis) as per document of "Laporan Triwulan P2K3" period I – year 2024, - has been submitted to Dinas Ketenagakerjaan Kabuapten Labuhanbatu. • Record on emergency response drill, dated 14th November 2023. In 2024 will be planned in November 2024. • OHS inspection reported under document – sample seen dated 25 April 2024. The result: there was found the AP boots was broken (2 harvester). The follow up: change the AP boots. • PPE usage monitoring period March and April 2024: PPE monitoring performed in daily basis by each department. PPE monitoring present in "Checklist Pengiran APD". • OHS inspection conducted each month by OHS expert and team each month. OHS inspection covering: PPE usage inspection, unsafe action, and unsafe condition in area of: Workshop, harvesting, spraying working, manuring, housing. OHS inspection schedule 2024 were sighted. • Inspection and working environment observation, industry hygiene training, conducted on 17 March 2024 that was attended by 32 workers. • Refreshment training on accidents investigation training, conducted on 17 March 2024 that was attended by 32 workers. • Refreshment on training for first aiders, conducted on 16th February 	Complied
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		<p>2024 that was attended by 23 workers.</p> <ul style="list-style-type: none"> Evidence of PPE provision and handover to workers can be shown during audit in "Tanda Terima APD". <p>The auditor team has interviewed with sample of workers, and they have explained that PPE is provided free of charge, when the PPE is broken because of the working usage workers can request to change for the new PPE.</p>	
6.7.4	<p>All workers are provided medical care and covered by accident insurance. Costs incurred from work related incidents, leading to injury or illness, are covered in accordance with applicable regulations or by the unit of certification if applicable regulations do not provide protection.</p> <p>- Minor compliance -</p>	<p>All workers have been provided with medical care and accident insurance (BPJS Ketenagakerjaan & BPJS Kesehatan).</p> <p>This insurance has been paid monthly based on document review according to the applicable rule.</p> <p>The auditor has verified the payment of <i>BPJS Ketenagakerjaan & BPJS Kesehatan</i> from period of January – March 2024. It can be concluded that the payments have been conducted routinely (monthly) in accordance with total worker including family member for national health insurance.</p> <p>The recent payments are as follows (note: the payment written in this report only for recent payment, because the latest payment of <i>BPJS Ketenagakerjaan & BPJS Kesehatan</i> will not be accepted if the previous period payment not been paid yet).</p> <p>Data verified:</p> <ul style="list-style-type: none"> Medical Assurance (BPJS Kesehatan) – Billing Statement period March 2024, amount IDR **,2525,755, Status: PAID dated 16th April 2024 via Bank Rakyat Indonesia. Workers Assurance payment period March 2024 based on Formulir 2 PU – BPJS Ketenagakerjaan, No BU Code: BB 020568 amount IDR: 	Complied

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		<p>***,038,619. Status: PAID.</p> <p>Based on interview with the workers and Labor Union, there is no issue related medical care. If the first aid post cannot handle the medical care, the patient will be brought to the hospital in the city using company's Ambulance.</p> <p>For contractor's workers, based on document review and interview with contractor representative, it is known that the accident insurance for workers is covered by the contractors.</p>	
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics. - Minor compliance -	<p>PT Indo Sepadan Jaya – Tanjung Selamat has demonstrated the report of safety index. The safety index is monitoring tool, indicating number of worker (at each operating units), number of major and minor accident as well as the lost time injury.</p> <p>The monitoring carried out on monthly basis and results were discussed during safety committee meeting. The incident statistics include man-hours, lost time accident and Frequency rate (FR) and Severity rate (SR) were reported quarterly as P2K3 report by safety officer to Manpower office.</p> <p>Data verified of record of accident report and incident statistics include man-hours, lost time accident and Frequency rate (FR) and Severity rate (SR) were made by safety officer (Ahli K3) – in 2024 there were 3 accidents occur with category first aid and 1 accident category medical aid with lost time injury 7 man days.</p>	Complied
Principle 7: Protect the environment, conserve biodiversity and ensure sustainable management of natural resources.			
Criteria 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.			
7.1.1	(C) IPM plans are implemented and monitored to ensure effective pest control. - Critical (Major) compliance -	Based on document review during ASA1.3, it was known that Integrated Pest Management (IPM) was implemented and documented in related records, e.g. "Monitoring Pengendalian Hama UPDKS March 2023", "Rekap Serangan Hama dan Penyakit", Pest Census Summary form B2 (Ulat Api & Ulat Kantong), "Data Titik Sensus Ulat Api", "Ringkasan	Complied

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		<p><i>Sensus Hama Tikus</i>", "<i>Sensus Kandang Burung Hantu</i>", "<i>Formulir A4 Sensus Burung Hantu</i>".</p> <p>Summary of IPM in Tanjung Selamat Estate period March 2024; attack of <i>Setora nitens</i> above APK is 12 Ha, average 8 caterpillar/frond; below APK is 221 Ha, average 2 caterpillar/frond. Control being done using fogger. No new infested <i>Oryctes</i> found; controlled using <i>Lamda sihalotrin</i> 1% in monthly intervals. No new infested <i>Molusca</i> found; controlled using <i>Sibutox</i> 10 gr/palm in monthly intervals. Termite infestation found based on "<i>Deteksi dan Pengendalian Hama Rayap</i>" period January 2024, there was 1,023 palms controlled. Control has been done on infested palms and isolation using <i>Fipronil</i> at dosage 1,5 cc/liter water.</p> <p>Detection and census of <i>Ganoderma</i>, conducted by 4 rounds in a year. Control done by felling manually, chopping and making hole 1,5 m x 1,5 m x 1 m. Based on <i>Ganoderma</i> census period February 2024, there was no attack from <i>Ganoderma</i>.</p> <p>Program and Progress of Host Plant upkeep; interpolation done to replace dead palms. Watering program for newly planted host plants until they are 1 month old. Weeding / spraying is carried out with a target of once every 2 months. Compound fertilization 15:15:6:4 at a dose of 5 gr/palms at the age of 3 and 6 months after planting.</p> <p>Tanjung Selamat and Pangkatan Estate has implemented biological control to minimize or eliminate pest and disease, e.g. by use of barn owl and planting beneficial plants such as <i>Casia sp.</i>, <i>Antigonon leptopus</i> and <i>Turnera subulatta</i>.</p>	
7.1.2	<p>Invasive species are not to be used according to applicable regulation in managed areas, unless plans to prevent and monitor their spread are implemented.</p> <p>- Minor compliance -</p>	<p>Based on document review during ASA1.3, it was known that Inventory and identification of invasive species in the Tanjung Selamat and Pangkatan Estate has been done according to the List listed in the regulation "Minister of Environment and Forestry Regulation No. P.94/MENLHK/SEKJEN/KUM.1/12/2016".</p>	Complied

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		<p>The unit of certification has a list of existing invasive species and evaluate the status of control in certified area in January 2024 in Tanjung Selamat Estate and Pangkatan Estate. Some species are naturally existing in the area and the spreading are controlled manually, e.g. <i>Clidemia hirta</i>, <i>Imperata cylindrica</i> and <i>Mikania micranta</i>. The are no species in the list that used to manage areas in unit of certification.</p> <p>Activity of inventory and identification of Invasive Species has been included into the Conservation Management Plan to be periodically carried out.</p>	
7.1.3	<p>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.</p> <p>- Minor compliance -</p>	<p>Based on field visit, document review, interview to the stakeholders during ASA1.3, it was known that there is no use of fire for pest control in whole area of Tanjung Selamat and Pangkatan Estate.</p>	Complied
Criteria 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.			
7.2.1	<p>(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p> <p>- Critical (Major) compliance -</p>	<p>Based on document review during ASA1.3, it was known that Justification of pesticide used is explained under company procedure of weed control - "SOP Pengendalian Gulma No. AA-APM-OP-11100.08-R1" dated 1 November 2008.</p> <p>Chapter IV explains the weed control program for woody, grass, fern, caladium, wild banana (<i>Musa Sp</i>), <i>Asystasia</i>, etc. It does explain active ingredients use to control such weed, dosage per application, type of nozzle used and volume of spraying per application.</p> <p>Chapter V explains selection of pesticide and its active ingredients content, nature of the pesticide and target species.</p> <p>Chapter VII describes calculation of actual area implemented per hectare plantation (spray factor), spraying rotation and spraying output.</p> <p>Spraying works were conducted by selected spraying on specific target, for example weeds spraying on circle, path and TPH (FFB Collecting Point), other areas beside specific area were not applied, Riparian area</p>	Complied

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		<p>along the river are prohibits to be performed spraying to minimize and reduce the negative environmental impact to the river and ecosystem. Field visit for pesticides application has carried out in Block A16b Afd 1 Tanjung Selamat Estate and Block G11 Afd I Pangkatan Estate.</p> <p>Pesticide and herbicide used by company was registered in the book of pesticides - "Komisi Pestisida" and has permit from government.</p>	
7.2.2	<p>(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per Ha and number of applications) are provided.</p> <p>- Critical (Major) compliance -</p>	<p>The company has recorded list of herbicides used, completed with active ingredient, LD50, WHO class, trademark, target, registration number and expiry date.</p> <p>Type, volume used and volume per Ha of pesticide in Tanjung Selamat Estate and Pangkatan Estate periode January – December 2023 can be shown during audit.</p> <p>Pesticide and herbicide use by Tanjung Selamat and Pangkatan Estate: Meta Prima 20 WDG, Gulmaron 80 WP, Bionasa 75 WG, Kenlon 480 EC, Polydor 25EC, Regent 50SC, Decis 2.5EC and Manthene 75 SP.</p>	Complied
7.2.3	<p>(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p> <p>- Critical (Major) compliance -</p>	<p>Based on result of interview to the management, the use of pesticide are minimized as part of the plan, and in accordance with IPM Plans, there are no pesticide application outside of the targeted species and planned intervals. Pesticide is only used to reduce / eliminate existing pest, which has exceeded the economic threshold. It also evident that in controlling pest, the unit of certification committed to always reduce pesticide usage and give priority to the prevention of mechanical, biological and integrated pest management.</p>	Complied
7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in Indonesia best practice guidelines.</p> <p>- Minor compliance -</p>	<p>The company use fipronil as prophylactic control of termite, the prophylactic use fipronil are described in SOP of Pest and Disease Control (AA-APM-OP- 1100.10-R3) Section 8.5 Control of Termite. Fipronil is a WHO class II insecticide. It described that for prophylactic, 6 palms around infested palm is applied 3 liter insecticide on ground with 30 cm radius.</p>	Complied

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7.2.5	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat, are not to be used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks. The due diligence refers to:</p> <ul style="list-style-type: none"> - Minor compliance - <p>7.2.5a Judgment of the threat and verify why this is a major threat.</p>	<p>There are no pesticides that categorized as World Health Organization Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat used by the unit of certification.</p>	Complied
	<p>7.2.5b Why there is no other alternative which can be used.</p>	<p>During this audit ASA1.3, according to IPM procedures, certificate holder always using biological approach in order to be monitoring pest attack. For example, estate still using <i>Tyto alba</i> to monitor rat infestation than using rodenticide.</p> <p>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 procedure has set the specific pesticide in with minimum risk in accordance with the target. During this ASA1.3 audit there is no revision of the SOP.</p> <p>Company no longer using <i>paraquat diklorida</i> since November 2019.</p>	
	<p>7.2.5c Which process was applied to verify why there is no other less hazardous alternative.</p>	<p>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). During this ASA1.3 audit there is no revision of the SOP.</p> <p>There is no use of pesticide that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, or paraquat in whole operation of unit of certification.</p>	

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	7.2.5d Process to limit the negative impacts of the application.	<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"> • Pesticide/herbicide selection to ensuring the application is effective. • Set up the appropriate nozzle in chemical weeding activity based on weed type, topography and availability of water. • Regularly spraying calibration to ensuring the application is effective and efficient. • Calculate pesticide/herbicide usage based on target (hectarage and weed type). • Spraying technic. <p>There is no use of pesticide that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, or paraquat in whole operation of unit of certification.</p>	
	7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.	<p>Until this ASA1.3, Certificate holder did not use 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>There is no use of pesticide that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, or paraquat in whole operation of unit of certification.</p>	

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7.2.6	<p>(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they conduct.</p> <p>- Critical (Major) compliance -</p>	<p>Certificate holder has assigned 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). They regularly attended training on pesticide handling that conducted by the pesticide supplier in collaboration with local pesticide committee. Training for pesticides applicator uses was delivered on 19 April 2019 by PT Syngenta Indonesia. refreshment training for SOP and WI regarding spraying work was conducted on 1 March 2023. Training covered handling of agrochemical concentrate and spraying method including pesticide hazard and use of PPE.</p> <p>Application of pesticides was following SOP of Pesticides Management – “Pestisida dan Pengelolaannya” (AA-APM-OP-1100.11-R1) Chapter III point 3.2 which stated that pesticide operator must be fit, not in pregnancy or breast feeding, must have meal before work, and uses appropriate PPE.</p> <p>Spraying team using sign board indicating spraying/herbicide application is in progress for a block. Spraying supervisor was pre- mixing the herbicide in the chemical warehouse, transport the mixed chemical via truck, using cone and spill tray on the field to minimize spillage. The type and dosage of herbicide are carefully measured and prepared for targeted weed control; circle and path spray or selective weeding (wooden, bracken, or VOP). Nozzle calibration conducted regularly and recorded – evident.</p> <p>During field visit at spraying activity at Block A16b Afd 1 Tanjung Selamat Estate and Block G11 Afd I Pangkatan Estate, it was known that sprayers and spraying supervisor have trained with best management practice for weed control, spraying techniques, using PPE and received regular medical check-up. Clean water and soap on the field are provided for sprayer. Supervisor was equipped with first aid kit. Appropriate PPE has been provided by company and used by spraying</p>	Complied
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		workers such as: Apron, leather and rubber hand gloves, respiratory masker, safety goggles, head cover and rubber boot.	
7.2.7	(C) Storage of all pesticides in accordance with recognized best practices. - Critical (Major) compliance -	<p>PT Indo Sepadan Jaya – Tanjung Selamat POM has defined the procedure on handling of pesticide storage as per “Pengangkutan dan Penyimpanan Bahan Kimia AA-KL-02-EFP” dated 1 February 2008. The procedures have mentioned that:</p> <ul style="list-style-type: none"> • Pesticides are stored in the determined area separated from fertilizer and other chemicals. • Pesticide storage is provided in Divisions as well as in central storage. Agrochemical 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 provided including boots, apron, safety glass, respiratory mask, and hand gloves. • The possible spillage is managed. Secondary containment is provided around the pesticide storage area. Spill kit is also provided in the area. <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.</p> <p>The auditor team has filed visit to 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>	Complied

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7.2.8	<p>All pesticide containers that are disposed of and/or used for other purposes are managed according to applicable regulations and/or instructions on the packaging.</p> <p>- Minor compliance -</p>	<p>PT Indo Sepadan Jaya – Tanjung Selamat POM has defined the procedure for proper disposal of pesticide waste material that was described in “Penanganan Limbah Industri B-3 AA-KL-06-EFP” dated 1 November 2008. Pesticide waste was reusing as mixing water for the next spraying activity. All empty pesticides containers were triple rinsed and stored in the temporary storage of hazardous wastes.</p> <p>The management of waste material from empty pesticide container disposed through licensed hazardous waste storage according to the procedure. The company has licensed temporary hazardous waste storage where all empty pesticide containers from agrochemical storage collected.</p> <p>PT Indo Sepadan Jaya – Tanjung Selamat POM have temporary hazardous waste storage where all hazardous waste from all estates and mills collected.</p> <p>Data verified:</p> <ul style="list-style-type: none"> • Licensed for temporary hazardous waste storage based on “Keputusan Kepala Dinas Penanaman Modal dan Pelayanan Terpadu Satu Pintu Kabupaten labuhan Batu Nomor: 503.660.3/556/DPMPTSP-BP2MNP/2019 Tentang Pemberian Izin Pengelolaan Limbah B3 Untuk Kegiatan Penyimpanan Limbah B3 kepada PT ISJ” valid for 5 years. • Record of hazardous waste coming in and coming out are available in “Neraca Limbah B3”. Example for period January to Macrh 2024, there was oil used total 0.20 M, chemical empty container total 0.032 MT. <p>The auditor team has interview with sample worker as personnel in charge to handling hazardous waste, they have clearly explained the</p>	Complied
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		mechanism of pesticide waste handling including MSDS and personal protective equipment as well as first aid.	
7.2.9	<p>(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.</p> <p>- Critical (Major) compliance -</p>	During ASA-1.2-year 2024, the auditor team has interviewed with Estate Management, surrounding community and field observation, there was no pesticide applied aerially in PT Indo Sepadan Jaya – Tanjung Selamat Estate and PT Rantau Sinar Karsa – Pangkatan Estate.	Complied
7.2.10	<p>(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p> <p>- Critical (Major) compliance -</p>	<p>Annual medical check-up was conducted for all workers handling with chemical, such as pesticide, herbicide, and fertilizer.</p> <p>The latest medical check-up performed on 18 June 2023 – location in at company medical healthcare that was attended by workers of fertilizer applicators, spraying applicator and PIC in pesticides storage.</p> <p>The result of MCU has communicated to related workers according to “Berita Acara Sosialisasi MCU”.</p>	Complied
7.2.11	<p>(C) No pesticide-related work is carried out by pregnant or breastfeeding women, or people with medical limitations and they are offered other equivalent work alternatives.</p> <p>- Critical (Major) compliance -</p>	<p>PT Indo Sepadan Jaya – Tanjung Selamat POM is prohibiting pregnant or breast-feeding women, and or people with medical limitations to perform chemical spraying. To mitigate, estate performed monthly pregnancy test.</p> <p>PT Indo Sepadan Jaya has also kept the record that spraying is not conducted by pregnant or breast-feeding women.</p> <p>The PP Test (pregnant test) has conducted every month. The latest of pregnancy test conducted in February, March and April 2024. All the female sprayer in well condition and not being pregnant nor breast feeding.</p>	Complied

Note For 7.2.11

Referring to Act No. 13 of 2003 concerning Manpower, Act No. 35 of 2014 concerning Child Protection, and taking into account the risks of hazards on palm oil plantations and mills on the development and physical, mental and social health of children, the national interpretation mandates that the unit of certifications does not employ people under the age of 18 for pesticide spraying. For this reason, the provisions of young workers under 18 years in indicator 7.2.11 are irrelevant.

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Criteria 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.		
7.3.1	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented in accordance with applicable laws and regulations.</p> <p>- Minor compliance -</p>	<p>PT Indo Sepadan Jaya – Tanjung Selamat POM has shown the document of waste management plan under “Evaluasi Aspek Dampak Lingkungan” nomor: EMS-431-003-LT latest review on 12 January 2024.</p> <p>The identification of waste and pollution sources including used lubricant and filter, old battery, used laboratory chemical, clinical/medical waste, mill effluent, EFB, smoke, dust, fiber and shell, empty agrochemical container, boiler ash, scrap iron, used tires, waste water and domestic household refuse.</p> <p>Hazardous and medical waste is disposed to the register collectors while domestic waste disposed to the landfill, organic and an organic waste is separate in line site, organic waste to the landfill and some of inorganic waste is collected for re-cycle.</p> <p>PT Indo Sepadan Jaya has also established the procedure to manage the waste generated from all activity, such as:</p> <ul style="list-style-type: none"> • Procedure AA-KL-05-EFP, procedure of non-hazardous waste handling covering: mill water (used rail, used part, ex chemical non-hazardous/toxic, EFB, fiber, shell), estate waste (used polybag, ex fertilizer sack), office waste (used paper, used work equipment), Workshop waste (used hose, used drum, scraped/used parts, used tire), power generator waste (used hose, used parts, scarped), Logistic waste (ex-fertilizer sack, used drum). • Procedure AA-KL-11-EFP, procedure of laboratory waste handling. • Procedure to utilize the fiber and shell (solid waste) as a boiler fuel SOP No. AA-MPM-OP-1400.04-R1 “Pemanfaatan fiber untuk bahan bakar”. <p>EFB (Empty Fruit Bunch) utilization as a mulching or organic fertilizer according to SOP Pemupukan AA-APM-OP-1100.09-R1.</p>

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7.3.2	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p> <p>- Minor compliance -</p>	<p>PT Indo Sepadan Jaya – Tanjung Selamat POM has a waste management plan, identifying type and source of waste and the disposal plan.</p> <p>PT Indo Sepadan Jaya – Tanjung Selamat POM has also prepared a procedure to handle hazardous waste titled “Prosedur Penanganan Limbah B3” No. AA-KL-06-EFP explains methods to collecting the waste, recording in balance and disposal through licensed third-party transporter.</p> <p>PT Indo Sepadan Jaya – Tanjung Selamat POM have temporary hazardous waste storage where all hazardous waste from all estates and mills collected.</p> <p>Data verified:</p> <ul style="list-style-type: none"> • Licensed for temporary hazardous waste storage based on “Keputusan Kepala Dinas Penanaman Modal dan Pelayanan Terpadu Satu Pintu Kabupaten labuhan Batu Nomor: 503.660.3/556/DPMPTSP-BP2MNP/2019 Tentang Pemberian Izin Pengelolaan Limbah B3 Untuk Kegiatan Penyimpanan Limbah B3 kepada PT ISJ” valid for 5 years. • Record of hazardous waste coming in and coming out are available in “Neraca Limbah B3”. Example for period January to Macrh 2024, there was oil used total 0.20 M, chemical empty container total 0.032 MT. <p>The auditor team has interview with sample worker as personnel in charge to handling hazardous waste, they have clearly explained of disposed empty containers pesticides, such as: Empty chemical containers re-used only for mixing purposes, unusable are triple rinsed, punctured and disposed to the approval collector.</p>	Non-compliance
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		<p>Non conformance:</p> <p>PT Indo Sepadan Jaya dan PT Rantau Sinar Karsa prepared a procedure to handle hazardous waste titled "Prosedur Penanganan Limbah B3" No. AA-KL-06-EFP explains methods to collecting the waste, recording in balance and disposal through licensed third-party transporter.</p> <p>However, based on field visit (dated 7 – 8 May 2024), the auditor found that the certificate holder has not consistence on disposal of waste material according to procedures.</p> <p>Evidence: In emplacement areas both at POM & Estate found the use of used chemical packaging for water storage: including blue chem, Pertamina drums, ex-pesticide packaging</p>	
7.3.3	The unit of certification does not use open fire for waste disposal. - Minor compliance -	<p>All waste products have been identified and documented under the "Evaluasi Aspek- Dampak Lingkungan" (Environmental Aspect impacts). Domestic waste is the main concern to be manage. Both Mill and Estate, has periodically schedule to manage the domestic waste. Regulation of domestic waste management refer to "UU No. 18 Tahun 2008 tentang Pengelolaan Sampah".</p> <p>PT Indo Sepadan Jaya and PT Rantau Sinar karsa has provide landfill for domestic waste. During field visit to landfill area at Tanjung Selamat Estate and Pangkatan Estate shown that landfill area has well managed and domestic waste handling in accordance with procedure and regulation.</p> <p>There is no open fire for waste disposal. PT Indo Sepadan Jaya also has a policy of Zero burning.</p>	Non-compliance

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		<p>Non conformance:</p> <p>Based on field visit (dated 8 May 2024), there was found the use open fire for waste disposal.</p> <p>Evidence: In emplacement in Pangkatan Estate, there was found the use open fire for waste disposal (still burning).</p>	
Criteria 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	<p>Good agricultural practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts is documented.</p> <p>- Minor compliance -</p>	<p>The unit of certification has established procedure soil fertility in "SOP AA-APM-OP-1100.09. R1" - SOP Pemupukan, consist of type and recommendation of fertilizer for immature and mature areas, cycle, dosage and when fertilizer is applied. The company has applied management strategy to maintain soil fertility according to the procedure. Manuring was performed manually with spreading the fertilizer by person uniformly in each palm oil trees in accordance with dosage which has defined by Research and Development recommendation.</p> <p>There is no change related to the SOP until ASA1.3 audit.</p> <p>Fertilizers were applied to maintain and increase soil fertility, fertilizer applied in accordance to the fertilizer recommendation which created based on soil and leaf analysis. Records of fertilizer application in Tanjung Selamat and Pangkatan Estate 2023/2024 as well as recommendation are available in "Fertilizer Application and Recommendation 2023/2024".</p>	Complied
7.4.2	<p>Analysis of tissue samples (e.g. leaves) and soil on a regular basis to monitor and manage changes in soil fertility and plant health is documented.</p> <p>- Minor compliance -</p>	<p>Based on document review during ASA1.3, it was known that analysis of tissue samples was implemented. Records of periodical leaf sampling and visual analysis were available. Foliar Analysis Report shows that leaf sampling and analysis has been done recently in July 2023. The result has been used to develop fertilizer recommendation of Y2024.</p>	Complied

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		<p>For Tanjung Selamat Estate, it was shown "Foliar Analysis Report" PT Indo Sepadan Jaya – Tanjung Selamat Estate as per Laboratory Report No. 47/LSU-AGR/04/2023 dated 15 April 2023 by R&D PT Nusa Pusaka Kencana Analytical & QC Laboratory, total sample 30 and Laboratory Report No. 47/LSU-AGR/04/2023 dated 15 April 2023, total samples 21.</p> <p>Evidence of soil analysis was shown on as per Laboratory Report No. 02/RD-NT/S/AGT/19 dated 13 August 2019 by R&D PT Nusa Pusaka Kencana Analytical & QC Laboratory, Tanjung Selamat Estate, total samples 18.</p> <p>Evidence of soil analysis was shown on as per Laboratory Report No. 041/RD-NT/S/AGT/19 dated 13 August 2019 by R&D PT Nusa Pusaka Kencana Analytical & QC Laboratory, Pangkatan Estate, total samples 17.</p>										
7.4.3	<p>A nutrient recycling strategy is in place, which include the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.</p> <p>- Minor compliance -</p>	<p>Nutrient recycling strategy performed by application of bunch ash. In 2023 it was applied 450,146 kg of bunch ash from budget 550,000 kg in Tanjung Selamat Estate. There is no application EFB and POME in Tanjung Selamat and Pangkatan Estate since the plantation area is peat.</p>	Complied									
7.4.4	<p>Records of fertilizer inputs are maintained.</p> <p>- Minor compliance -</p>	<p>During ASA1.3 it was known that all fertilizer input recorded in "Laporan Unit Kebun (LUK)", a monthly report covers all of upkeep activities. Below are record of recommendation and realization of fertilizer in Tanjung Selamat Estate and Pangkatan Estate.</p> <p>Y2023</p> <table><tr><td>Fertilizer</td><td>Tanjung Selamat Estate (MT)</td><td>Pangkatan Estate (MT)</td></tr><tr><td>Ground Magnesium Limestone</td><td>1,122.95</td><td>1,366.71</td></tr><tr><td>Ammonium Sulphate</td><td>501.91</td><td>469.16</td></tr></table>	Fertilizer	Tanjung Selamat Estate (MT)	Pangkatan Estate (MT)	Ground Magnesium Limestone	1,122.95	1,366.71	Ammonium Sulphate	501.91	469.16	Complied
Fertilizer	Tanjung Selamat Estate (MT)	Pangkatan Estate (MT)										
Ground Magnesium Limestone	1,122.95	1,366.71										
Ammonium Sulphate	501.91	469.16										

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		<table><tr><td>Urea</td><td>543.33</td><td>503.12</td></tr><tr><td>Potassium Sulphate</td><td>2,298.56</td><td>2,415.50</td></tr><tr><td>Ground Rock Phosphate</td><td>521.40</td><td>654.50</td></tr><tr><td>Borite</td><td>92.73</td><td>84.51</td></tr><tr><td>NPK</td><td>-</td><td>105</td></tr></table>	Urea	543.33	503.12	Potassium Sulphate	2,298.56	2,415.50	Ground Rock Phosphate	521.40	654.50	Borite	92.73	84.51	NPK	-	105		
Urea	543.33	503.12																	
Potassium Sulphate	2,298.56	2,415.50																	
Ground Rock Phosphate	521.40	654.50																	
Borite	92.73	84.51																	
NPK	-	105																	
Criteria 7.5: Practices minimise and control erosion and degradation of soils.																			
7.5.1	(C) Maps that identify marginal and fragile soils, including steep sloped land are available. - Critical (Major) compliance -	Tanjung Selamat Estate: Map of peat soil is available in place with scale 1 : 20.000, including: 1. Peta Kerja Kebun Tanjung Selamat, contained block number, Afdeling, hectares, road, river and housing complex. 2. Peta Citra Landsat year 2002. 3. Elevation Map; contain 0 – 8% (3.855 ha) 4. Topography Map; contain 2.5 – 12.5 m above sea level 5. Soil and Suitability Map; a. Peat < 1 meter: 1.602 ha b. Peat 1 – 3 meter: 2.101 ha c. Peat > 3 meter: 152 ha Total: 3,855 ha 6. Soil Serial Map There is no change related to the peat soil map until ASA1.3 Pangkalan Estate:		Complied															

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		<p>Peta Citra Landsat 7 ETM, path 128, raw: 058, PT Rantau Sinar Karsa Kebun Pangkatan, year 2002, scale 1:20.000</p> <p>Soil Serial Map, covers 3,855 ha, scale 1:20.000:</p> <ul style="list-style-type: none"> - Typic Endoaquults Pangkatan Series. - Sapric Haplohemists Pangkatan Series. - Typic Haplohemist Pangkatan Series. <p>Soil Suitability Map, scale 1:20.000;</p> <ul style="list-style-type: none"> - Typic Endoaquults – Slope: 0-3% (856 ha) - Typic Haplohemist, Peat < 1 m; Slope 0-3% (746 ha) - Sapric Haplohemist, Peat 1 - 3 m; Slope: 0-3% (2,101 ha) - Sapric Haplohemist, Peat > 3m; Slope 0-3% (152 ha) <p>Marginal Suitable Area (S3): ± 746 ha (19,4%)</p> <p>Unsuitable Area with Condition (N1): ± 3,109 ha (80,6%).</p> <p>There is no change related to the peat soil map until ASA1.3</p>	
7.5.2	<p>The replanting of palm oil is not conducted extensively on steep terrain in accordance with applicable regulations.</p> <p>- Minor compliance -</p>	<p>Based on elevation map, there is no steep terrain in Tanjung Selamat and Pangkatan Estate, therefore there is no replanting in steep terrain. It was also confirmed during field visit to Tanjung Selamat Estate and Pangkatan Estate during ASA1.3.</p>	Complied
7.5.3	<p>New palm oil planting is not conducted on steep terrain in accordance with applicable regulations.</p> <p>- Minor compliance -</p>	<p>Based on elevation map, there is no steep terrain in Tanjung Selamat and Pangkatan Estate, therefore there is no replanting in steep terrain. It was also confirmed during field visit to Tanjung Selamat Estate and Pangkatan Estate during ASA1.3.</p>	Complied
<p>Criteria 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.</p>			

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7.6.1	<p>(C) Evidence of long-term land suitability for oil palm cultivation, soil maps or soil surveys that identify marginal and fragile soils, including steep terrain are available, in planning and operations.</p> <p>- Critical (Major) compliance -</p>	<p>Until this ASA1.3 audit, there is no changing on the document of Long-term land suitability for oil palm cultivation, soil maps or soil surveys that identify marginal and fragile soils, including steep terrain.</p> <p>In procedure no. AA-SOP-OP-1100-05.R3 "Konservasi Tanah dan Air" has determined strategy control erosion particular in slope area, such as: 0 – 5°, 6 – 12°, 13 -20° and more than 20°. Steep slope categorized as >20° or 40%, Hilly slope between 13° – 20°. Terracing made in the slope 10° – 15°). The company has applied silt pit, L shape stacking frond and terracing in slope area to reduce soil erosion.</p> <p>Tanjung Selamat Estate:</p> <p>Map of peat soil is available in place with scale 1 : 20.000, including:</p> <ul style="list-style-type: none"> – Peta Kerja Kebun Tanjung Selamat, contained block number, Afdeling, hectares, road, river and housing complex. – Peta Citra Landsat year 2002. – Elevation Map; contain 0 – 8% (3,855 ha) – Topography Map; contain 2.5 – 12.5 m above sea level – Soil and Suitability Map; <ul style="list-style-type: none"> a. Peat < 1 meter: 1,602 ha b. Peat 1 – 3 meter: 2,101 ha c. Peat > 3 meter: 152 ha – Soil Serial Map <p>Pangkatan Estate:</p> <ul style="list-style-type: none"> – Peta Citra Landsat 7 ETM, path 128, raw: 058, PT Rantau Sinar Karsa Kebun Pangkatan, year 2002, scale 1:20.000 – Soil Serial Map, covers 3,855 ha, scale 1:20.000 <ul style="list-style-type: none"> ○ Typic Endoaquults Pangkatan Series. 	Complied
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		<ul style="list-style-type: none"> ○ Sapric Haplohemists Pangkatan Series. ○ Typic Haplohemist Pangkatan Series. – Soil Suitability Map, scale 1:20.000; <ul style="list-style-type: none"> ○ Typic Endoaquults – Slope: 0-3% (856 ha) ○ Typic Haplohemist, Peat < 1 m; Slope 0-3% (746 ha) ○ Sapric Haplohemist, Peat 1 - 3 m; Slope: 0-3% (2,101 ha) ○ Sapric Haplohemist, Peat > 3m; Slope 0-3% (152 ha) ○ Marginal Suitable Area (S3): ± 746 ha (19.4%) ○ Unsuitable Area with Condition (N1): ± 3,109 ha (80.6%) – Elevation Map, scale 1:20.000; Flat (0 - 8%): 3,855 ha. <p>necessary drainage for oil palm growing has been conducted and documented in "<i>Studi Drainase Di Areal Gambut Kebun Pangkatan PT Rantau Sinar Karsa (RSK)</i>, April 2016.</p> <p>The conclusions from this study are as follows:</p> <ul style="list-style-type: none"> – Pangkatan Estate elevation ranges from 6 to 13 m asl, and it is above the merbau river with the lowest contour height is 1.3 m. – The actual drainage class in general is S-3 which means that water excess can be released when the Merbau River water level is at the lowest level (LWL). – Pangkatan Estate has a vary peat depth from 1 to > 3 m with good maturity level (saprik). <p>Minimum economic life span of peatlands in Pangkatan Estate is about 74.6 years and may change according to land management and drainage system.</p> <p>Drainability Assessment in Tanjung Selamat Estate has been conducted and documented in "<i>Laporan Studi Drainase Di Areal Gambut Kebun Tanjung Selamat PT. Indo Sepadan Jaya, Maret 2017</i>".</p>	
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		<p>The conclusions from this study are as follows:</p> <ul style="list-style-type: none"> – Elevation range at Pangkatan Estate are 7 – 11 m asl, and it is above Kalundang river with the lowest contour 7.6 m. – The actual drainage class at Tanjung Selamat Estate in general is S-2 which means that water excess can be released when the Kalundang River water level is at the middle level (MWL) to lowest level (LWL). – Tanjung Selamat Estate has a vary peat depth from 1 to > 3 m with middle - good maturity level (hemik - saprik). <p>Minimum economic life span of peatlands at Tanjung Selamat Estate is about 103.3 years (4 planting period) and may change according to land management and drainage system.</p> <p>There is no change related to Drainability Assessment until ASA1.3.</p>	
7.6.2	Extensive planting on marginal and fragile soils is avoided or, if necessary, carried out according to the best-practice soil management plan. - Minor compliance -	There is no extensive planting conducted by unit of certification. Currently the whole area is replanting. The youngest planting in Tanjung Selamat Estate is 2017 and in Pangkatan Estate is 2020.	Complied
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	Map of soil based on soil survey as described in indicator 7.6.1 has been used to guide drainage and irrigation system, roads and other infrastructure.	Complied
Criteria 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	(C) No new planting on peatlands, regardless of depth, after 15 November 2018, in existing plantation areas, as well as in new development areas. - Critical (Major) compliance -	There is no new planting process performed by the unit of certification until this ASA1.3.	Complied
7.7.2	Peat areas within the managed area are inventoried, documented and reported to the RSPO Secretariat (effective from November 15, 2018). - Minor compliance -	The unit of certification has inventoried and documented peat areas within the managed area, the RSPO Peat Inventory document has been reported to RSPO Secretariat as evident in email to GHG unit of RSPO Secretariat on 14 November 2019. RSPO has acknowledge the report.	Complied

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		Second submission of RSPO Peat Inventory has been submitted to RSPO on 1 November 2023 and RSPO has acknowledge the report by email confirmation from RSPO on 8 November 2023.																																																																	
PROCEDURAL NOTE: Maps and other documentation for peatlands are provided, prepared and shared according to the RSPO Working Group (Peatland Working Group / PLWG) audit guide (See Procedural Notes for Indicator 7.7.5 below).																																																																			
7.7.3	(C) Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -	<p>Subsidence of peat is monitored in the Peat Subsidence Measurement document. The following is an example of data for the period June - September and September - December 2023 in Tanjung Selamat Estate:</p> <table border="1"> <thead> <tr> <th>Block</th><th>Previous (cm)</th><th>Recent (cm)</th><th>Subsidence (cm)</th></tr> </thead> <tbody> <tr> <td colspan="4">Period: Jun – Sep 2023</td></tr> <tr> <td>A16f</td><td>22.0</td><td>22.0</td><td>0</td></tr> <tr> <td>B13j</td><td>21.5</td><td>21.5</td><td>0</td></tr> <tr> <td>C14i</td><td>21.2</td><td>21.2</td><td>0</td></tr> <tr> <td>D13g</td><td>19.0</td><td>19.0</td><td>0</td></tr> <tr> <td colspan="4">Period: Sep – Dec 2023</td></tr> <tr> <td>A16f</td><td>23</td><td>23.0</td><td>0</td></tr> <tr> <td>B13j</td><td>22</td><td>22.0</td><td>0</td></tr> <tr> <td>C14i</td><td>22.5</td><td>22.5</td><td>0</td></tr> <tr> <td>D13g</td><td>22.5</td><td>22.5</td><td>0</td></tr> </tbody> </table> <p>The company monitors peat subsidence, based on Peat Substance Measurement for the period July - December 2023 in Pangkatan Estate:</p> <table border="1"> <thead> <tr> <th>Block</th><th>Previous (cm)</th><th>Recent (cm)</th><th>Subsidence (cm)</th></tr> </thead> <tbody> <tr> <td>D17j</td><td>1</td><td>1</td><td>1</td></tr> <tr> <td>D20c</td><td>0</td><td>0</td><td>0</td></tr> <tr> <td>C20b</td><td>0</td><td>0</td><td>0</td></tr> <tr> <td>A17a</td><td>1</td><td>1</td><td>0</td></tr> </tbody> </table>	Block	Previous (cm)	Recent (cm)	Subsidence (cm)	Period: Jun – Sep 2023				A16f	22.0	22.0	0	B13j	21.5	21.5	0	C14i	21.2	21.2	0	D13g	19.0	19.0	0	Period: Sep – Dec 2023				A16f	23	23.0	0	B13j	22	22.0	0	C14i	22.5	22.5	0	D13g	22.5	22.5	0	Block	Previous (cm)	Recent (cm)	Subsidence (cm)	D17j	1	1	1	D20c	0	0	0	C20b	0	0	0	A17a	1	1	0	Complied
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		<table border="1"> <tr><td>A16d</td><td>0</td><td>0</td><td>0</td></tr> <tr><td>A18b</td><td>1</td><td>1</td><td>1</td></tr> <tr><td>A18j</td><td>0</td><td>0</td><td>0</td></tr> <tr><td>B19i</td><td>0</td><td>0</td><td>0</td></tr> <tr><td>B14e</td><td>0</td><td>0</td><td>0</td></tr> <tr><td>B19l</td><td>0</td><td>0</td><td>0</td></tr> <tr><td>B18g</td><td>1</td><td>1</td><td>0</td></tr> </table> <p>Minimizing peat subsidence performed by water management plan, constructing water gate, water level measurement and subsidence measurement. The company has established a documented water management program to ensure that subsidence of peat soils is minimized and monitored. There is sufficient evidence that the defined program was implemented. During audit ASA1.3, the company has installed water gate, main drain gate, peat subsidence monitoring, and washing drainage regularly, also monitoring of water level, main gate water lever, peat subsidence level.</p>	A16d	0	0	0	A18b	1	1	1	A18j	0	0	0	B19i	0	0	0	B14e	0	0	0	B19l	0	0	0	B18g	1	1	0	
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B19l	0	0	0																												
B18g	1	1	0																												
7.7.4	<p>(C) Availability of implementation evidence of the water and land cover management program.</p> <p>- Critical (Major) compliance -</p>	<p>The unit of certification has documented water and ground cover management program and maintained records of monitoring subsidence of peat soils, i.e.:</p> <ul style="list-style-type: none"> - Water Level Monitoring, using water level pole. - Monitoring of Peat Subsidence, using peat subsidence pole. - Water Table Monitoring, using piezometer. <p>Monitoring of water level and water table performed twice in a month. During visit to water table at Block D13q Tanjung Selamat Estate, found that water table is 52 cm from surface. During visit to water table at Block A16f Pangkatan Estate, found that water table is 45 cm from surface.</p>	Complied																												

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		<p>The total monitoring points for groundwater level are 19 points. Groundwater level regulation activities are documented in the document "Pemantauan Muka Air Tanah". The following is an example of Groundwater Level Monitoring for the period of December 2023:</p> <table><tr><th>Block</th><th>Date</th><th>Ground Water Level (cm)</th><th>Rainfall (mm)</th></tr><tr><td>A16f</td><td rowspan="4">31/12/2023</td><td>40</td><td rowspan="4">110</td></tr><tr><td>B13j</td><td>42</td></tr><tr><td>C14i</td><td>45</td></tr><tr><td>D13q</td><td>51</td></tr></table> <p>The following is a record of the ground water level in Pangakatan Estate, based on groundwater level report period December 2023</p> <table><tr><th colspan="2">Monitoring Point</th><th rowspan="2">Ground Water Level (cm)</th></tr><tr><th>Latitude</th><th>Longitude</th></tr><tr><td>2° 9' 12.58" N</td><td>99° 59' 01.21" E</td><td>37</td></tr><tr><td>2° 11' 35.28" N</td><td>99° 58' 35.76" E</td><td>46</td></tr><tr><td>2° 11' 36.76" N</td><td>99° 59' 42.80" E</td><td>42</td></tr><tr><td>2° 12' 42.84" N</td><td>99° 59' 51.18" E</td><td>54</td></tr></table>	Block	Date	Ground Water Level (cm)	Rainfall (mm)	A16f	31/12/2023	40	110	B13j	42	C14i	45	D13q	51	Monitoring Point		Ground Water Level (cm)	Latitude	Longitude	2° 9' 12.58" N	99° 59' 01.21" E	37	2° 11' 35.28" N	99° 58' 35.76" E	46	2° 11' 36.76" N	99° 59' 42.80" E	42	2° 12' 42.84" N	99° 59' 51.18" E	54	
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7.7.5	(C) Drainability assessments are conducted for plantations planted on peat following the RSPO Drainability Assessment Procedure, or other method recognized by RSPO, (at least five years or in accordance with the provisions of the RSPO Drainability Assessment Procedure) before replanting. The results of the assessment are used to determine the period	Based on document review during ASA1.3, the organization has conducted Drainability Assessment. Drainability Assessment to determine the long-term viability of the necessary drainage for oil palm growing has been conducted and documented in "Studi Drainase Di Areal Gambut Kebun Pangkatan PT Rantau Sinar Karsa (RSK), April	Complied																															

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	<p>of replanting to be carried out, as well as to gradually replace oil palm cultivation for at least 40 years or two cycles, (whichever is longer), before reaching the natural gravitational drainage limit for peat. If oil palm is gradually replaced, it is replaced by other commodity crops that are better suited for higher groundwater levels (paludiculture) or rehabilitated with natural vegetation.</p> <p>- Critical (Major) compliance -</p>	<p>2016. Drainability assessment conducted by Research and Development department of company.</p> <p>The conclusions from this study are as follows:</p> <ol style="list-style-type: none"> 1. Pangkatan Estate elevation ranges from 6 to 13 m asl, and it is above the merbau river with the lowest contour height is 1.3 m. 2. The actual drainage class in general is S-3 which means that water excess can be released when the Merbau River water level is at the lowest level (LWL). 3. Pangkatan Estate has a vary peat depth from 1 to > 3 m with good maturity level (saprik). 4. Minimum economic life span of peatlands in Pangkatan Estate is about 74.6 years and may change according to land management and drainage system. <p>PT Rantau Sinar Karsa – Pangkatan Estate has performed re-assessment of drainability in January 2020 following the RSPO Drainability assessment procedure 2019 and Peat Restoration Policy (based on Decree of Direktorat Jenderal Pengendalian Pencemaran dan Kerusakan lingkungan”, summary of the study as follow:</p> <ol style="list-style-type: none"> 1. The natural drainage limit of the Pangkatan Estate is 79 cm obtained from the average water level of the Merbau River in 2018-2019. 2. The largest depth of peat in the Pangkatan Estate is 5.9 m. 3. Pangkatan Estate elevation ranges from 1.3 to 6.5 m above the Merbau River. 4. The rate of peat subsidence can be divided into 3 groups, namely shallow peat 0.7 cm/year, medium peat 1.7 cm/year and deep peat 3 cm/year. 5. Pangkatan Estate reaches the natural drainage limit soonest after 53 years on block B18c, so that the deadline for replanting can be done in block B18c is 13 years. 	
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		<p>Drainability Assessment in Tanjung Selamat Estate also has been conducted and documented in "<i>Laporan Studi Drainase Di Areal Gambut Kebun Tanjung Selamat PT Indo Sepadan Jaya, March 2017</i>".</p> <p>The conclusions from this study are as follows:</p> <ol style="list-style-type: none"> 1. Elevation range at Pangkatan Estate are 7 – 11 m asl, and it is above Kalundang river with the lowest contour 7.6 m. 2. The actual drainage class at Tanjung Selamat Estate in general is S-2 which means that water excess can be released when the Kalundang River water level is at the middle level (MWL) to lowest level (LWL). 3. Tanjung Selamat Estate has a vary peat depth from 1 to > 3 m with middle - good maturity level (hemik - saprik). <p>Minimum economic life span of peatlands at Tanjung Selamat Estate is about 103.3 years (4 planting period) and may change according to land management and drainage system.</p> <p>Replanting program and activity in Pangkatan Estate has been done in 2020 and Tanjung Selamat Estate has been done in 2017 and there is no more replanting program and activity after 2020.</p>	
<p>PROCEDURAL NOTE: For 7.7.5: Detailed information on the RSPO Drainability Assessment Guide along with related concepts and detailed actions is contained in the Guidelines currently being adjusted / tested by the RSPO Working Group on Peatlands (Peatland Working Group / PLWG). The final version must obtain PLWG approval in January 2019 and will include additional Guide on the steps to be followed after deciding not to replant and the consequences for other stakeholders, farmers, local communities, and the unit of certification concerned. It is recommended that the trial methodology period is proposed to be extended for 12 months for all relevant management units (ie management units that have plantations on peat) to utilize the methodology and provide input to PLWG so that existing procedures can be further refined as needed before January 2020. The unit of certification has the option to delay replanting until the issuance of the revised Guidelines for the guidelines. Additional guidance for alternative commodity crops and rehabilitation of natural vegetation will be regulated by the PLWG.</p>			
7.7.6	<p>(C) All existing plantations on peat are managed according to applicable laws and/or "RSPO Guidelines for Best Management Practices (BMP) for Oil Palm Cultivation that are already on Peatlands", version 3 (June 2019) along with related audit guidelines (May 2019).</p>	<p>The unit of certification has established a procedure of Water Management AA-SOP-OP-1100.17-R1. Documented water management program to ensure that subsidence of peat soils is minimized and monitored has been established. There is sufficient evidence that the</p>	Complied

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	<p>- Critical (Major) compliance -</p>	<p>defined program was implemented. Water management procedure for peat land is implemented, the company has installed water gate, main drain gate, peat subsidence monitoring, and clean drainage regularly, also monitoring of water level and water table, main gate water level and peat subsidence level.</p> <p>There is no change related to the SOP until ASA1.3</p> <p>The organization has documented water and ground cover management program and maintained records of monitoring subsidence of peat soils, i.e.:</p> <p>Water Level Monitoring, using water level pole.</p> <ul style="list-style-type: none"> – Monitoring of Peat Subsidence, using peat subsidence pole. There are 4 pole subsidence installed in Tanjung Selamat Estate Block A16f, B13i, C14i and D13j. In Pangkatan Estate there are 12 subsidence poles installed in Block A18i, A18b, A16e, A17a, H92e, G92d, G92i, B18g, B18b, C91n, D17i and C91h. – Water Table Monitoring, using piezometer. There are 4 piezometers installed in Tanjung Selamat Estate Block A16f, B13i, C14i and D13j. While in Pangkatan Estate there are 12 piezometers installed in Block A18i, A18b, A16e, A17a, H92e, G92d, G92i, B18g, B18b, C91n, D17i and C91h. <p>There is no change related to the amount of water level until ASA1.3</p> <p>Monitoring of water level and water table performed twice in a month. During visit to water table at Block D13q Tanjung Selamat Estate, found that water table is 50 cm from surface. During visit to water table at Block A16f Pangkatan Estate, found that water table is 41 cm from surface.</p> <p>Based on the meeting in November 2018 at the Directorate General of Environmental Pollution and Damage Elimination of the Ministry of Environment and Forestry - <i>"Direktorat Jenderal Pengendalian Pencemaran dan Kerusakan Lingkungan Kementerian Lingkungan Hidup</i></p>	
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		<p><i>dan Kehutanan</i>”, PT Indo Sepadan Jaya is included in the Peat Restoration policy. So based on a letter from the Directorate General of Environmental Pollution and Damage Elimination of the Ministry of Environment and Forestry No. S.320/PPKL/PKG/PKL.6/11/2018 dated 22 November 2018, regarding the follow-up to the implementation of the restoration of peat ecosystems and the submission of a map of indications of damage to the peat ecosystem, that the company is mandatory to restore the function of the peat ecosystem as stipulated in PermenLH No. P.16/MENLHK/SETJEN/ KUM.1/2017 concerning technical guidelines for restoring peat ecosystem.</p> <p>Tanjung Selamat Estate, PT Indo Sepadan Jaya has implemented a peat ecosystem restoration plan and recorded on “<i>Rencana Pemulihan Ekosistem Gambut</i>” and the document was sent to the Minister of Environment and Forestry on 11 March 2019, the document contains:</p> <ol style="list-style-type: none"> 1) PT Indo Sepadan Jaya Peat Ecosystem Recovery Plan Document. 2) Map of peatland use area. As well as monitoring points for peat land. <p>Receipt of Plantation Unit Peat Damage Indication Map and/or Plantation Activities for submission in the form of Peat Ecosystem Damage Indication Map and/or Plantation Activities with no. S.320/PPKL/PKG/PKL.0/11/2018 dated 26 November 2018.</p> <p>Available decree of “Direktur Jenderal Pengendalian Pencemaran dan Kerusakan Lingkungan” dated 26 July 2019, regarding “Penaatan Tinggi Muka Air Tanah dan Titik Stasiun Pemantauan Curah Hujan PT Indo Sepadan Jaya”. Described map of monitoring point, person in charge, monitoring schedule once in two weeks, reporting obligation in three month intervals to “Direktur Jenderal Pengendalian Pencemaran dan Kerusakan Lingkungan Kementerian Lingkungan Hidup dan Kehutanan”; Governor of North Sumatera and Regent of Labuhanbatu Selatan Regency.</p>	
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		Pangkalan Estate, PT Rantau Sinar Karsa has established and sent Document of Peatland Ecosystem Restoration Plan to the "Direktorat Jenderal Pengendalian Pencemaran dan Kerusakan Lingkungan Kementerian Lingkungan Hidup dan Kehutanan" on 5 November 2019. Available letter from the Director General No. S.94/PPKL/PKG/PKLO/4/2019 dated 1 April 2019 regarding Instructions for implementing peat ecosystem restoration and submitting indications maps of peat ecosystem damage. Available map of damage to the peat ecosystem as attachment of Note No. S.94/PPKL/PKG/PKLO/4/2019 dated 1 April 2019 in scale 1:24,000. The Ministry of Environment and Forestry has acknowledged the restoration plan.	
7.7.7	<p>(C) All peat areas not planted and reserved in managed areas (regardless of depth) are protected as 'peatland conservation areas'; unit of certification are prohibited from constructing drainage channels, building roads and new electricity lines on peatlands; unless if it is for a non-corporate land clearance. Peatlands are managed in accordance with 'RSPO Best Management Practices for the Management and Rehabilitation of Natural Vegetation related to Oil Palm Cultivation that already exists in Peatlands' (the latest version) along with relevant audit guidelines.</p> <p>- Critical (Major) compliance -</p>	Based on field visit, interview and document review during ASA1.3, there is no addition (extension) planting on peat in Tanjung Selamat and Pangkatan Estate. All peat area planted are inside the existing plantation.	Complied
Criteria 7.8: Practices maintain the quality and availability of surface and groundwater.			
7.8.1	<p>A water management plan is available and is implemented to support efficient use of water sources and continuous availability and avoid negative impacts on other users in the catchment. The plan referred to contains the following matters:</p> <p>- Minor compliance -</p> <p>7.8.1a The unit of certification does not limit access to clean water or does not pollute the water used by the community.</p>	PT Indo Sepadan Jaya – Tanjung Selamat POM and supply bases have established water management plan, consist of management water supply for domestic, water consumption and measurement of water quality. Identification water need as regulated in "Peraturan Menteri PU No.14/PRT/M/2010 (domestic consumption is 60 liters/person/day and water needed for mill processing, Ground and surface water resources and its permit, management and monitoring wastewater, included domestic wastewater.	Complied

		<p>The Company has a water management document, both in the estate and mill. Monitoring the implementation of water management has been implemented on a regular basis, such as surface water quality monitoring each semester at Kalundang river (upstream and downstream) and merbau river (Upstream and downstream) are available in the report of RKL/RPL. Company has analysed water quality each semester to ensure the compliance against PP No. 82 tahun 2001 regarding water quality standard, the result of water quality monitoring on 8 January 2024 by Laboratory PT ATMOS Laboratorium Indonesia (sample No. 0035B.01.AP.1) shown that water quality is complies with national regulation.</p> <p>Procedure SOP AA-APM-OP-1100.05. R1 "Konservasi Tanah dan Air" has been established to maintain the quality and availability of water. Procedures was also established for protection and management of riparian buffer zones at or before replanting. Procedure mentioned that in 50m on the left and right side of riparian buffer zones, estates are prohibited to apply agrochemical, used manual manuring and river bank was planted by erosion barrier crop (planting of "vetiver" grass, <i>Pheronema canescens</i> and <i>Bamboosa sp</i>). The organisation also has policy that prohibits estates for planting in 50m on the left and right side of riparian buffer zones at or before replanting. Warning board placed regarding prohibition to apply agrochemicals and fertiliser in the buffer zone. Riparian buffers of small natural water courses were 50 metres wide on both sides of the rivers as defined in the procedure AA-KL-12-EFP "Restorasi Riparian dan Areal Sekitar Danau/Waduk atau Mata Air lainnya". Several evidence of maintaining quality and availability of water were evident, such as plan and realisation of riparian management, installation of warning boards, planting erosion prevention plan (e.g. <i>Pheronema canescens</i>, <i>Terminalia cattapa</i>, <i>Bamboosa sp</i> and vetiver grass) and monitoring of water quality.</p>	
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		PT Indo Sepadan Jaya and PT Rantau Sinar Karsa does not limit access to clean water or does not pollute the water used by the community. Company has monitor clean water quality each semester to ensure the water use by community and employee are met with standard Permenkes No. 32 Tahun 2017 regarding clean water quality standard. Latest monitoring on 8 January 2024 by Laboratory PT ATMOS Laboratorium Indonesia (sample No. 0035B.01.AP.1)	
	7.8.1b Workers have adequate access to clean water.	Company was providing the clean water for workers at housing area with ground water (drill well) at Tanjung Selamat Estate and clean water from Mill for Mill workers Housing. Regular water analysis was performed to monitor the water quality. Water analysis performed on 8 January 2024 by Laboratory PT ATMOS Laboratorium Indonesia; standard refer to PermenKes No. 32 year 2017 Appendix I, Chapter IIA, analysis result shown that all parameter analyzed are met with the standard regulation, certificate analysis number D.10.1928/LHU/2022. Interview with workers during onsite audit confirmed that they have adequate access to clean water provide by company.	
7.8.2	<p>(C) Water courses and wetlands are protected, including the maintenance and restoration of riparian zones and other buffer zones during or before replanting, in accordance with the "RSPO Manual on BMPs for the management and rehabilitation of riparian reserves" (April 2017) or Simplified Guide Management and Rehabilitation of Riparian Reserves (2018).</p> <p>- Critical (Major) compliance -</p>	<p>PT Indo Sepadan Jaya and PT Rantau Sinar Karsa has establish management plan to protect water courses and wetlands, including securing and maintaining appropriate riparian.</p> <ul style="list-style-type: none"> - Riparian restoration with forest vegetation plant/tree. - Establish zone for zero chemical. No spraying and fertilizing along riparian zone. Based on visit in riparian zone (Sempadan Sungai Kalundang in Tanjung Selamat Estate and Sungai Merbau in Pangkatan Estate) - Conserve natural vegetation in riparian zone - Restricted to conduct replanting palm oil in riparian area <p>During field visit to Kalundang River at Tanjung Selamat Estate and Merbau River at Pangkatan Estate can be shown that riparian area are</p>	Complied

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		well maintained, no chemical application near to riparian, no disturbance on riparian, natural vegetation are protected and the signboard information and awareness are available.											
7.8.3	<p>Mill effluent is managed according to applicable regulations. The quality of mill effluent discharged, especially BOD (Biochemical Oxygen Demand) is monitored in accordance with applicable regulations.</p> <p>- Minor compliance -</p>	<p>PT Indo Sepadan Jaya – Tanjung Selamat Pom has defined the procedure of WWTP operation available in Mill Policy Manual (MPM) dated February 1, 2013, chapter AA-MPM-OP-1400.13-R1.</p> <p>PT Indo Sepadan Jaya - Tanjung Selamat POM has an effluent treatment system (WWTP), which consists of Colling Pond, Primary Anaerobic Pond, Secondary Anaerobic Pond, Acidification Pond, and Buffering Pond.</p> <p>Tanjung Selamat POM has installed Biogas power plant (Methane capture) since 2019 to generate electrical power by using wastewater treatment. The biogas system has Anaerobic MBR system through digester Thermophilic fermentation, and anaerobic membrane tank. According to effluent monitoring data, all produced mill effluent used for Biogas plant and after following the flow process of WWTP the wastewater which has fulfil the standard/threshold discharged to the river.</p> <p>As required by permit, Mill conducts monthly check on discharged effluent in cooperation with accredited Laboratory (Laboratorium Balai Teknik Kesehatan Lingkungan dan Pengendalian Penyakit (BTKLPP) Kelas I Medan).</p> <p>Sample seen effluent monitoring year 2024:</p> <table><tr><th>Parameter</th><th>Mg/liter</th><th>Jan</th><th>Feb</th><th>March</th></tr><tr><td>TSS</td><td>250</td><td>130</td><td>151</td><td>106</td></tr></table>	Parameter	Mg/liter	Jan	Feb	March	TSS	250	130	151	106	Complied
Parameter	Mg/liter	Jan	Feb	March									
TSS	250	130	151	106									

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		<table><tr><td>pH</td><td>6.0 – 9.0</td><td>7.15</td><td>7.60</td><td>7.40</td></tr><tr><td>BOD</td><td>100</td><td>40.11</td><td>32.81</td><td>33.82</td></tr><tr><td>COD</td><td>350</td><td>170.37</td><td>190.63</td><td>149.71</td></tr><tr><td>Minyak dan Lemak</td><td>25</td><td>13.90</td><td>11.90</td><td>10.20</td></tr><tr><td>Nitrogen total</td><td>50</td><td>26.43</td><td>22.08</td><td>18.76</td></tr></table> <p>According to recent testing result, all parameter of applied effluent has met the applicable threshold of PerMenLH No. 05 tahun 2014 Lampiran III regarding standard of effluent discharge to the river.</p>	pH	6.0 – 9.0	7.15	7.60	7.40	BOD	100	40.11	32.81	33.82	COD	350	170.37	190.63	149.71	Minyak dan Lemak	25	13.90	11.90	10.20	Nitrogen total	50	26.43	22.08	18.76	
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7.8.4	Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -	Tanjung Selamat POM has recorded the mill water use per ton FFB, includes monitoring of water usage for mill processing and domestic usage. The results of water usage monitoring are recorded in the “Mill Operation Summary” year 2023, updated in December 2023. The actual of water consumption (m³/ton FFB) until December 2023 is 1.02 m³/ton FFB and it is lower than budget 1.20 m³/ton FFB.	Complied																									
Criteria 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised																												
7.9.1	Plans to increase the efficiency of fossil fuel use and to optimize renewable energy are available, monitored and documented. - Minor compliance -	PT Indo Sepadan Jaya and PT Rantau Sinar Karsa has prepared the program for improving efficiency of the use of fossil fuels and to optimize renewable energy under “Program Manajemen Lingkungan” year 2023 - 2024. To improving efficiency of the use of fossil fuels such monitoring on use of fossil fuels. Fossil fuel records was maintenance and the trends shown. Energy use records include accurate measurements of renewable energy use per ton of FFB processed. Fossil fuel usage is recorded for operational purpose, including the efficiency analysis.	Complied																									

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		<p>PT Indo Sepadan Jaya has also shown the report that all energy used in both mills is monitored and recorded under document of "<i>Laporan Unit Pabrik 2024</i>" and "<i>Pemakaian Energi Pabrik Tanjung Selamat 2024</i>".</p> <p>The report explained that the fossil fuel records are maintained, and trends shown. Energy use records include accurate measurements of renewable energy use per tonne of FFB processed. All the fibre and most of shell consumed internally as boiler fuel.</p> <p>Tanjung Selamat POM is using 100% fibre and most of shell production for power generation during FFB processing. The fibre and nutshell are by-product from CPO production. Tanjung Selamat POM has calculated the total energy required for process, based on FFB tonnage x steam required to process a ton FFB x energy required to generate one kg steam. Tanjung Selamat POM has also calculated the potential energy generated from using fibre and nutshell. From calculation it was known that there is energy surplus, whereby used as power generation when mill is in operation but not processing FFB.</p> <p>Data verified:</p> <ul style="list-style-type: none"> • Since January – December 2023, shell usage for boiler fuel was 1,982 ton and Fiber usage as boiler fuel was 35,910 ton. • From the total energy use for palm oil mill process can be shown that renewable energy use was 91.5% and energy from fossil fuel was 6.8%. • Fossil fuel usage is recorded for operational purpose, including the efficiency analysis. <p>PT Indo Sepadan Jaya – Tanjung Selamat POM has shown that efficiency for diesel fuel usage has been minimize by monitoring kelp stell, air cleaner maintenance, tire pressure monitoring, and steel nozzle monitoring.</p>	
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Criteria 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.

7.10.1	<p>(C) GHG emissions for the unit of certification are identified and assessed. Plans to reduce or minimize GHG emissions are implemented, monitored through the PalmGHG calculator, and reported publicly.</p> <p>- Critical (Major) compliance -</p>	<p>PT Indo Sepadan Jaya – Tanjung Selamat POM has operate Methane Capture (biogas plant) to generate electric power – since June 2019.</p> <p>PT Indo Sepadan Jaya has also defined established "SOP Mitigasi gas Rumah Kaca AA-MPM-OP-1400.19. R1, dated 1 March 2015".</p> <p>Identification of pollutant and GHG has been implemented by Tanjung Selamat POM, Tanjung Selamat Estate and Pangkatan Estate, such as: usage of inorganic fertilizer, pesticide, fossil fuel usage, peat land, and POME.</p> <p>Based on Significant pollution and GHG emission was identified, for estates comes from using of pesticides, action plan to reducing pesticide was made such as program of integrated pest control where minimize to use chemical/pesticides.</p> <p>PT Indo Sepadan Jaya – Tanjung Selamat POM has prepared the Strategic and Mitigation Plan to reduce GHG emission, in example as follow:</p> <ul style="list-style-type: none"> • Sector: Plantation operation - Identification of Emission Sources: Land Clearing and Planting (Land Use Change) Activities: Land Clearing <ul style="list-style-type: none"> ➤ Potential Mitigation Options: ➤ Adopted Zero Burning Land Clearing methods. ➤ No Land Clearing in areas that identified as HCV area. ➤ Keep the HCV area as Carbon Stock/sequestration. ➤ Periodically inspection and patrol to avoid HCV disturbance and land fire. Activities: Fertilizing/Manuring <ul style="list-style-type: none"> ➤ Potential Mitigation Options: 	Complied
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		<ul style="list-style-type: none"> ➤ Effective fertilizing based on dosages and recommendation from Agronomy Department ➤ No Fertilizing on Rainy ➤ No Fertilizing on Riparian Zone ➤ Socialization to Worker the policy of Fertilizing in Company <p>The results of document verification and field visits, it is known that the company has made other efforts in reducing GHG emissions, such as:</p> <ul style="list-style-type: none"> • Has installed a dust collector to catch dust or particles flying in the air and has monitored the air quality carried out by conducting air quality testing and reported every semester contained in the UKL-UPL report. • The use of fiber and shells as a boiler fuel to minimize the fossil fuel usage. • Utilization of wastewater for Land applications to minimize the methane emission. • Utilization of EFB for composting to minimize the inorganic/chemical fertilizer usage. <p>Monitoring the physical condition of WWTP and perform the recorded volume of waste water that is applied.</p>	
7.10.2	<p>(C) Since 2014, an estimate of carbon stocks in the proposed development area has been carried out along with potential sources of emissions that can occur directly as a result of the development and plans to minimize these emissions are prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <p>- Critical (Major) compliance -</p>	<p>Up to ASA-1.3-year 2024, there is no new planting. The company has started planting in 1984, no new planting area/developing area since November 2005. Replanting has been performed since 2012 and planed until 2020. This indicator is Not Applicable</p>	Complied
7.10.3	<p>(C) Other significant pollutant identification results are available and plans to reduce or minimize them are implemented and monitored.</p> <p>- Critical (Major) compliance -</p>	<p>PT Indo Sepadan Jaya – Tanjung Selamat POM has demonstrated the document of identification of other significant pollutant identification results as per "Evaluasi Aspek – Dampak Lingkungan" EMS-431-003-LT</p>	Complied

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		<p>updated on 12 January 2024. Significant pollutants and GHG such as: Emission, particulate, noise from boiler and generator, effluent from mill wastewater, fertilizer application, chemical applicator, and transport of FFB.</p> <p>PT Indo Sepadan Jaya – Tanjung Selamat POM has also implemented and monitored a plan to reduce pollutant and emission. Emission, particulate, and noise from boiler and generator are tested and monitored every six months. Records of all monitoring are kept and documented. According to record of emission and particulate monitoring shown that all parameter analyzed were met with the threshold/standard.</p> <p>Monitoring of air emissions and ambient air quality conducted every semester. Emissions test conducted testing by Accreditation Laboratory. The results of the analysis have been demonstrated and reported to Environmental Agency every six months.</p>	
Criteria 7.11: Fire is not used for preparing land and is prevented in the managed area.			
7.11.1	<p>(C) Land for new planting or replanting is not prepared by burning.</p> <p>- Critical (Major) compliance -</p>	<p>PT Indo Sepadan Jaya – Tanjung Selamat POM has established the zero burning policy documented in “Kebijakan Perusahaan, 1 December 2019” stated in point 6: “Melakukan Praktek Tanpa Bakar dalam kegiatan pembangunan perkebunan dan secara aktif mendukung inisiatif mencegah dan mengawasi kebakaran hutan dan asap”.</p> <p>The policy was communicated to all employees and displayed at strategic locations of Mill and Estates and communicated to employees including contractor workers. Last refreshment on socialization the policies has carried out on 15th February 2024, 26 February 2024. The document verified such as: attendance list, training material and photograph.</p> <p>PT Indo Sepadan Jaya – Tanjung Selamat POM has started planting in 1984. Curenly there is no replanting activity in Tanjung Selamat Estate</p>	Complied

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		and Pangkatan Estate. Replanting has been performed since 2012 and planed until 2020.	
7.11.2	<p>The unit of certification establishes fire prevention and control measures for lands that are directly managed by the unit of certification.</p> <p>- Minor compliance -</p>	<p>There is no new planting within certified area of PT Indo Sepadan Jaya and PT Rantau Sinar Karsa after November 2005. The company has started planting in 1984. Curenly there is no replanting activity in Tanjung Selamat Estate and Pangkatan Estate. Replanting has been performed since 2012 and planed until 2020.</p> <p>Replanting has been done mechanically, consist of falling tree, chipping by excavator, terracing by excavator, digging, road construction, ditch/waterways construction, planting LCC and planting oil palm.</p> <p>During ASA-1.3-year 2024, the auditor team has field visit to tanjung Selamat Estate and Pangkatan Estate confirmed that the land preparation is using mechanical method. No open burning was noted for land preparation. It can also demonstrate in the agreement contract between company and subcontractor that all activity of replanting is performed manual and mechanically.</p> <p>PT Indo Sepadan Jaya and PT Rantau Sinar karsa also has establish the emergency response team for fire mitigation. Emergency response equipment for fire mitigation also provided by company.</p>	Complied
7.11.3	<p>The unit of certification engages stakeholders in adjacent locations for fire prevention and control measures.</p> <p>- Minor compliance -</p>	<p>PT Indo Sepadan Jaya – Tanjung Selamat POM has established the zero burning policy documented in "Kebijakan Perusahaan, 1 December 2019".</p> <p>The policy was communicated to all employees and displayed at strategic locations of Mill and Estates and communicated to employees including contractor workers.</p> <p>The policy of zero burning has communicated to all smallholder and local community to engages stakeholders in adjacent locations for fire prevention and control measures. Last refreshment on socialization the policies has carried out on 15th February 2024, 26 February 2024. The</p>	Complied

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		<p>document verified such as: attendance list, training material and photograph.</p> <p>Replanting has been done mechanically, consist of falling tree, chipping by excavator, terracing by excavator, digging, road construction, ditch/waterways construction, planting LCC and planting oil palm. Company has established "Ketentuan Replanting areal Mineral". In the mechanism explained that replanting must be conducted mechanically without burning.</p>	
<p>Criteria 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.</p>			
<p>PROCEDURAL NOTE for 7.12:</p> <p>The RSPO Principles and Criteria 2018 include new requirements to ensure the effective contribution of the RSPO in stopping deforestation. This will be achieved by incorporating the High Carbon Stock Approach (HCSA) Approach Guide into the revised standard.</p> <p>The RSPO ToC also encourages RSPO to commit to balancing between sustainable livelihoods and reducing poverty with the need to conserve, protect and improve the quality of ecosystems.</p> <p>High Forest Cover Countries (HFCC) are in dire need of economic opportunities that can help people choose their own path in carrying out development, while at the same time providing social and economic benefits and safeguards.</p> <p>Procedures will be developed that are adapted to support the development of sustainable palm oil by indigenous peoples and local communities who have legal or customary rights. The procedure will apply in certain HFCC countries and in the High Forest Cover Landscape (HFCL) within it.</p> <p>The development of this procedure will be guided by the No Deforestation Joint Steering Group (NDJSG) between the RSPO and HCSA members. In HFCC countries, RSPO will work with governments, communities and other stakeholders to develop this procedure through participatory processes at national and regional levels. The duration of this activity is specified in the Terms of Reference for NDJSG and is publicly available.</p>			
7.12.1	<p>(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCV or HCS forests.</p> <p>Historical analysis of Land Use Change Analysis (LUCA) is carried out before any new land clearing, in accordance with the RSPO LUCA Guidance document (see indicator 7.12.2).</p>	<p>There is no new planting. The company has started planting in 1984, no any new planting area/developing area since November 2005. Replanting has been performed since 2012 and planed until 2020. This indicator is Not Applicable.</p>	Not Applicable

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	- Critical (Major) compliance -		
7.12.2	<p>(C) HCV and HCS forests, and other conservation areas are identified as follows:</p> <p>- Critical (Major) compliance -</p> <p>7.12.2a) For existing plantations, with an HCV assessments conducted by RSPO- approved assessors and have no new land clearing after 15 November 2018, the existing HCV assessments remains valid.</p>	<p>The Certificate Holder both of Tanjung Selamat and Pangkatan estates has conducted HCV assessment included both of planted area and the relevant wider landscape. The HCV assessment was conducted by the competent HCV assessor. There is no any revisions on HCV assessment and HCV areas since the last audit. Short explanation of HCV assessment documents as below:</p> <p><u>Tanjung Selamat Estate (under PT Indo Sepadan Jaya)</u></p> <p>The company has conducted HCV identification with collaborated IPB (Bogor Agriculture University) in 2013 as documented in "Laporan Akhir Kajian Penuh (Full Assessment) Identifikasi dan Analisis Keberadaan Nilai Konservasi Tinggi (NKT) di Areal PT Indo Sepadan Jaya – Kebun Tanjung Selamat Tahun 2014".</p> <p>Assessor team consist of Dr. Ir. H. Nyoto Santoso, MS (Team Leader/RSPO HCV Assessor), Ahmad Faisal, S.Hut, MSI (Member /RSPO HCV Assessor), Eko Adhiyanto, S.Hut (Member); Sutopo S.Hut (Member /RSPO HCV Assessor); Rae Birumbo (Member), Arif Prasetyo, S.Hut (Member).</p> <p>Peer Review by Dr. Jarwadi Budi Hernowo (Independent Consultant/RSPO HCV Assessor) in January 2014.</p> <p>Based on the assessment report, it was identified HCV area, such as: HCV 1.3: 1.24 ha and HCV: 5,33 ha (total HCV area 6.57 ha). It means HCV area was 0.16% from total area of Tanjung Selamat Estate (3.977 ha).</p> <p><u>Pangkatan Estate (under PT Rantau Sinar Karsa)</u></p> <p>The company has conducted HCV identification with collaborated IPB (Bogor Agriculture University) in 2013 as documented in "Laporan Akhir Kajian Penuh (Full Assessment) Identifikasi dan Analisis Keberadaan</p>	Not Applicable

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

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	<p>enhanced. An Integrated management plans to protect and/or enhance HCV and HCS forests, peatland and other conservation areas are developed, implemented and adapted if necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan was developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>- Critical (Major) compliance -</p>	<p>November 2005. Replanting has been performed since 2012 and planed until 2020. This indicator is Not Applicable.</p>	
7.12.5	<p>Where rights of local communities have been identified in HCV areas and HCS forest after 15 November 2018, peatland and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p> <p>- Minor compliance -</p>	<p>There is no new planting after November 2018. The company has started planting in 1984, no any new planting area/developing area since November 2005. Replanting has been performed since 2012 and planed until 2020. This indicator is Not Applicable.</p>	Not Applicable
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 if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p>- Minor compliance -</p>	<p>The company has established "Conservation Management Plan" to manage and to monitor of RTE's, latest conservation management plan updated in January 2024. It was note that according to HCV assessment there was found RTEs such as: Kucing kuwuk (<i>Prionailurus Bengalensis</i>), Burung Madu kelapa (<i>Anthreptes Malacensis</i>), Elang Brontok (<i>Nisaetus Cirrhatus</i>), Kuntul kecil (<i>Egretta garzeta</i>) and etc.</p> <p>Company has monitor the RTE species and HCV area regularly.</p> <p>Based on document "LAPORAN MONITORING TUMBUHAN DAN SATWA LIAR (HCV)" for period January – June 2023 and July – December 2023, there is found and reported any RTE species (flora and fauna) within areas such as: Monyet ekor panjang (<i>Macaca fascicularis</i>), Elang tikus (<i>Ictinaetus malayensis</i>), cekakak belukar (<i>Halcyon smyrnensis</i>), burung pelatuk (<i>Dryocopus javensis</i>) etc.</p>	Complied

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		<p>Company has prepared a procedure for protection of flora and fauna, explained in Environmental Management System: Biodiversity (AA-432-002e-LT), IUCN red list (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 2024 consist of :</p> <ul style="list-style-type: none"> - HCV area demarcation - Socialization of HCV area and protection to employee and surrounding community - Riparian restoration - Prohibiting chemical application in riparian zone and its monitoring - Wildlife monitoring <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.</p> <p>PT Indo Sepadan Jaya 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</p>	
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		<p>inspection procedure, vegetation enhancement procedure and data analysis procedure.</p> <p>Interview and document verification of "LAPORAN MONITORING TUMBUHAN DAN SATWA LIAR (HCV)" for period January – June 2023 and July – December 2023 can be demonstrate that the measures contained in the management plan been actively implemented. Report of management and monitoring also submitted to Balai Konservasi Sumberdaya Alam (BKSDA) North Sumatera Province on 10 January 2024.</p>	
7.12.7	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p> <p>- Minor compliance -</p>	<p>There is no new planting after November 2018. The company has started planting in 1984, no any new planting area/developing area since November 2005. Replanting has been performed since 2012 and planed until 2020. This indicator is Not Applicable.</p> <p>HCV and wildlife/animal monitoring continuously conducted in a regular basis. Secondary monitoring conducted each month and primary monitoring conducted twice a year.</p> <p>Monitoring of animal/wildlife performed by HCV/Sustainability officer and field workers, result of monitoring presented in "LAPORAN MONITORING TUMBUHAN DAN SATWA LIAR (HCV)".</p> <p>Report of Management and Monitoring for HCV and RTEs is reported every 6 months and review is conducted regularly to ensure that monitoring is effective. Reports period semester I & II year 2023 can be demonstrated. Results of monitoring was evaluated using trend evaluation. Monitoring RTE species in January – December 2023 observed type of mammal and two species was protected by law or IUCN Redlist such as Monyet ekor panjang (<i>Macaca fascicularis</i>), Elang tikus (<i>Ictinaetus malayensis</i>), cekakak belukar (<i>Halcyon smyrnensis</i>), burung pelatuk (<i>Dryocopus javensis</i>) etc.</p> <p>Result of monitoring gives the feedback into the management plan improvement. The results from monitoring of wildlife, environmental,</p>	Complied

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		and socio-cultural services give feedback advice and recommendations to the management plan.	
7.12.8	<p>(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV- HCSA assessment since 15 November 2018, the Remediation and Compensation Procedures (RaCP) applies.</p> <p>- Critical (Major) compliance -</p>	<p>There is no new planting. The company has started planting in 1984, no any new planting area/developing area since November 2005. Replanting has been performed since 2012 and planed until 2020. This indicator is Not Applicable.</p>	<p>Not Applicable</p>

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Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **[2023]** for **[PT Indo Sepadan Jaya - Tanjung Selamat Mill]** and supply base was calculated using the PalmGHG Calculator version 4.0.1. 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 **[2023]** for **[PT Indo Sepadan Jaya - Tanjung Selamat Mill]** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	9.57
PKO	9.57

Extraction	%
OER	20.20
KER	4.07

Production	t/yr
FFB Process	103,118
CPO Produced	61,283
PKO Produced	12,351

Land Use	Ha
OP Planted Area	7,525
OP Planted on peat	7,525
Conservation (forested)	0.00
Conservation (non-forested)	117.48
Total	

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	39269.48	0.38	36217.60	0.40	0.00	0.00	75487.07	0.38
CO ₂ Emission from fertilizer	2925.90	0.74	3038.85	0.03	0.00	0.00	5964.75	0.74
NO ₂ Emission	29763.38	0.29	27450.28	0.30	0.00	0.00	57213.66	0.59
Fuel Consumption	792.45	0.01	733.34	0.02	0.00	0.00	1525.79	0.03
Peat Oxidation	217089.60	2.11	200218.20	2.21	0.00	0.00	417307.80	4.32
Sink								
Crop Sequestration	-37222.24	-0.36	-34329.48	-9.36	0.00	0.00	-71551.72	-9.72
Conservation Sequestration	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	254821.32	2.47	235374.27	2.60	0.00	0.00	753297.99	-3.66

*Note: Includes both estates and smallholders

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Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	11881.14	0.04
Fuel Consumption	258.78	0.00
Grid Electricity Utilization	144.25	0.00
Credit		
Export of Grid Electricity	0.00	0.00
Sales of PKS	-37118.40	-0.12
Sales of EFB	-23653.77	-0.08
Total	-48488.00	-0.16

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO ₂ e
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	0.00
Total Crusher emissions	0.00

*This mill has no kernel crusher operation.

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

POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	100
Divert to methane captured (flaring) (%)	13.78
Divert to methane captured (energy generation) (%)	86.22

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Appendix C: Location Map of Certification Unit and Supply bases

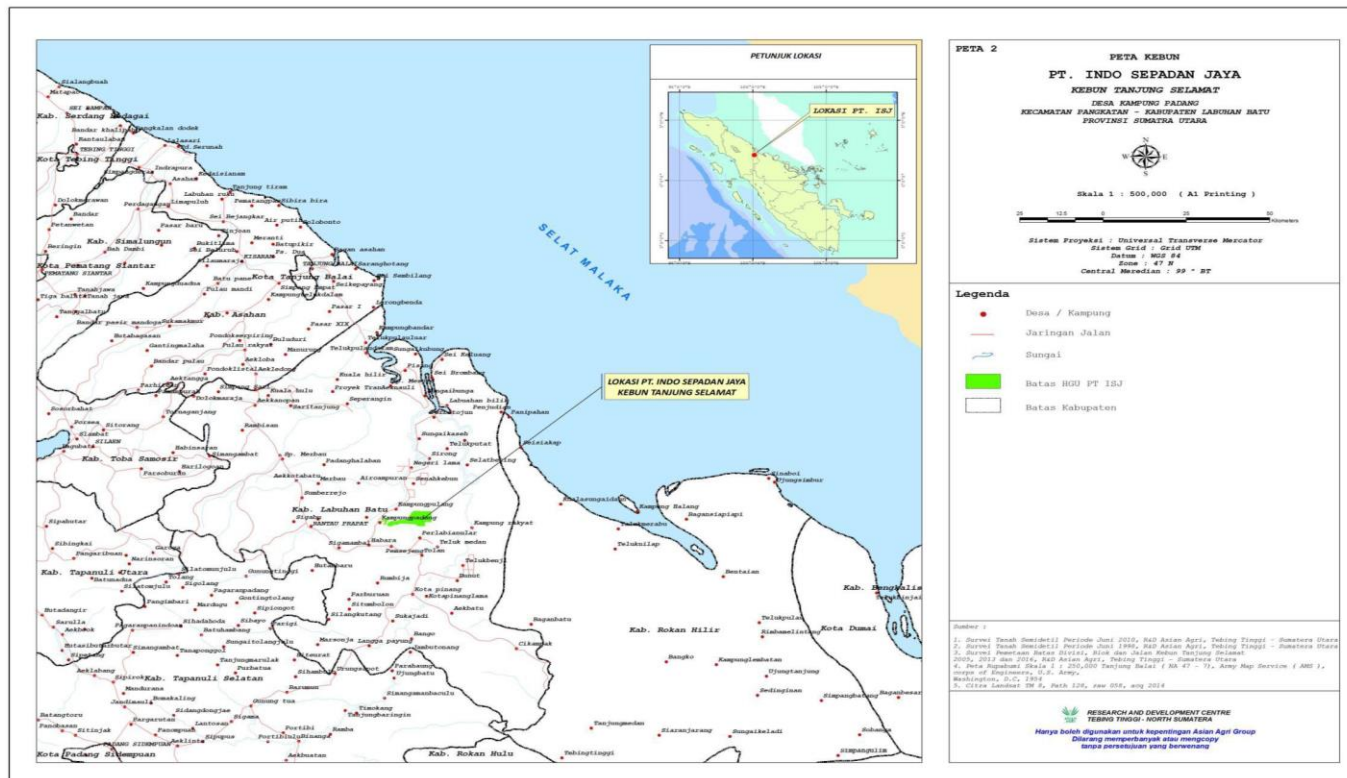
Figure 1 . Location of PT. Indo Sepadan Jaya & PT Rantau Sinar Karsa in Indonesia.



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

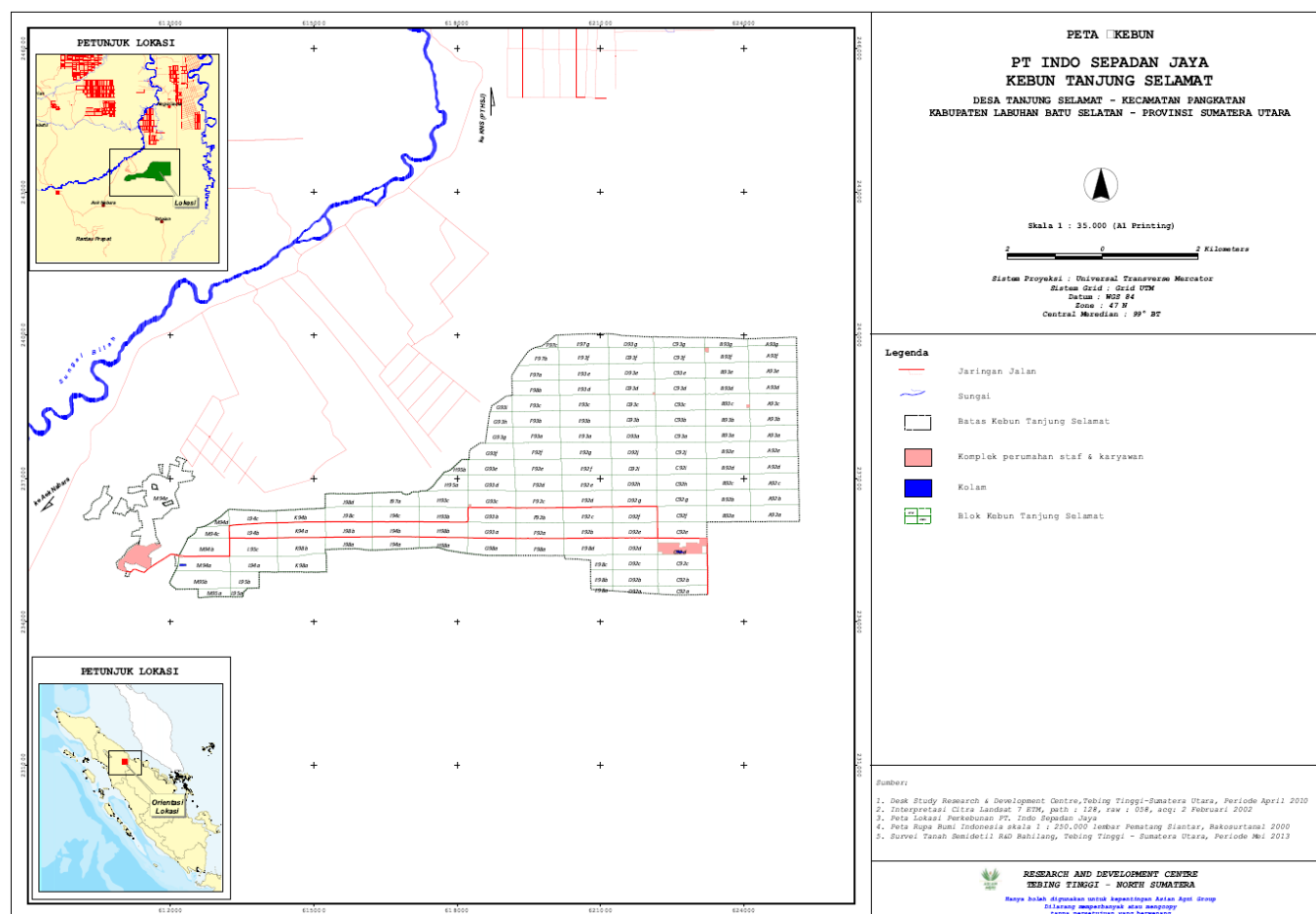


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Appendix D: Estate Field Map

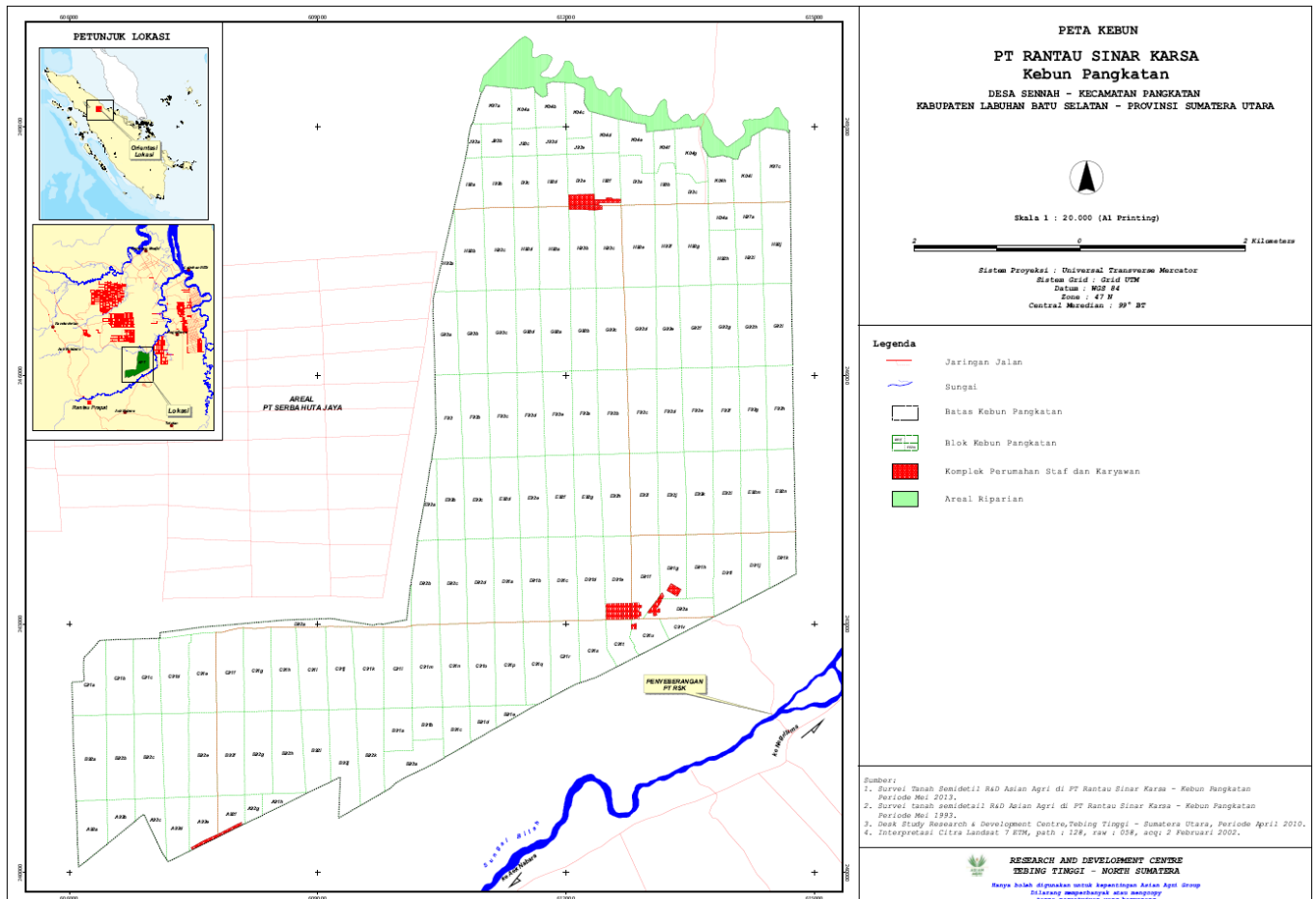
Figure 3a. Location of PT Indo Sepadan Jaya and neighbouring entities



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



Appendix E: List of Smallholder Registered and/or sampled

Not Applicable

Appendix F: 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
ISS	Independent Smallholder Standard
LD50	Lethal Dose for 50 sample
MB	Mass Balance
MSDS	Material Safety Data Sheet
MT	Metric Tonnes
OER	Oil Extraction Rate
OSH	Occupational Safety and Health
PK	Palm Kernel
PKO	Palm Kernel Oil
POM	Palm Oil Mill
POME	Palm Oil Mill Effluent
PPE	Personal Protective Equipment
RSPO	Roundtable on Sustainable Palm Oil
P&C	Principles & Criteria
RTE	Rare, Threatened or Endangered species
SCCS	Supply Chain Certification Standard
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure