PF441 RSPO P&C Public Summary Report Revision 15 (Nov 2023)

RSPO PRINCIPLE AND CRITERIA PUBLIC SUMMARY REPORT

□ Initial Assessment

☑ Annual Surveillance Assessment (2_3)

Recertification Assessment (Choose an item.)

□ Extension of Scope

Client Company Name / Parent Company: PT Inti Indosawit Subur

Client Company / Parent Company Address: JI Palembang Kav 35 – 37, Jakarta 10230, Indonesia

Certification Unit:

PT. Inti Indosawit Subur – Buatan II Palm Oil Mill

Location of Certification Unit:

Delik & Pangkalan Village, Bunut Langgam District, Pelalawan Regency, Riau Province, Indonesia

> Date of Final Report: 11/10/2024

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Section 1: Scope of the Assessment

| 1. Company Details | | | | | | |
|--|---|--|---------|--|--|--|
| Parent Company | PT. Inti Indosawit Subur | PT. Inti Indosawit Subur | | | | |
| RSPO Membership Number | 1-0022-06-000-00 | 1-0022-06-000-00 Membership Approval Date 06/02/2006 | | | | |
| Address | Jl Palembang Kav 35 – 37, Jaka | arta 10230, Inc | lonesia | | | |
| Palm Oil Mill / Group Manager / Estate (Certification Unit) | PT. Inti Indosawit Subur – Buatan II Palm Oil Mill | | | | | |
| Location / Address | Delik & Pangkalan Village, Pelalawan District, Pelalawan Regency, Riau 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 Informat | ion | | | | | |
|---|---|---|--------------------|------------|--|--|
| Certificate Number | RSPO 638947 | Certifica | te Start Date | 12/08/2021 | | |
| Date of First Certification | 16/09/2010 | Certifica | te Expiry Date | 11/08/2026 | | |
| Scope of Certification | Production of Sustainable Cru | ıde Palm Oi | I (CPO) and Palm K | ernel (PK) | | |
| Visit Objectives | Determination of the con with audit criteria. | • 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 | □ Pre Assessment (Choose an item.) □ Initial Assessment | | | | | |
| | ☑ Annual Surveillance Assess | ment (ASA | 2 3 | | | |
| | □ Recertification Assessment | • | — | | | |
| | □ Scope Extension | | · | | | |
| Applicable Standards / Normative Reference | RSPO Certification System for P&C and RSPO ISH 2020 ⊠ Indonesia National Interpretation 2020 of the RSPO P&C 2018 | | | | | |
| Supply Chain Module | □ Identity Preserved; ⊠ Mas | □ Identity Preserved; ⊠ Mass Balance Mill Capacity 60 MT/hour | | | | |
| ISH certification Phase | Eligibility Milestone A Milestone B Not Applicable | | | | | |
| Is this a remote audit or on-site audit | ☑ On-site audit (Option AI) | 1 | | | | |

| 3. Other Certifications | | | | | |
|-----------------------------|----------------|-----------------------|-------------|--|--|
| Certificate Number | Standard(s) | Certificate Issued by | Expiry Date | | |
| EU-ISCC-Cert-DE100-02042124 | ISCC EU | SGS | 01/02/2025 | | |
| SGS-ID-ISPO-0033 | ISPO | SGS | 21/03/2029 | | |
| ID05/65250 | ISO 14001:2015 | SGS | 10/06/2026 | | |

| 4. Location(s) of Mill & Supply Bases | | | | | |
|--|--|------------------------|------------------|--|--|
| Name | Location | GPS Coordinates | | | |
| (Mill / Supply Base / Group Manager / Smallholders) | | Latitude | Longitude | | |
| Buatan II Palm Oil Mill | Delik & Pangkalan Village, Pelalawan District, Pelalawan Regency, Riau | 00° 27' 36.0" N | 101° 52' 02.5"E | | |
| Simpang Perak Estate | Delik & Pangkalan Village, Pelalawan District, Pelalawan Regency, Riau | 00° 27' 36.0" N | 101° 52' 02.5"E | | |
| KUD Mulus Rahayu | Delima Jaya Village, Kerinci Kanan District, Siak Regency, Riau Province | 00° 30′ 37.6″ N | 101° 49′ 27.4″ E | | |
| KUD Bhirawa Bhakti | Buana Bhakti Village, Kerinci Kanan District, Siak Regency, Riau Province | 00° 31′ 20.1″ N | 101° 47′ 24.7″ E | | |
| KUD Tani Rukun | Simpang Perak Jaya Village, Kerinci Kanan District, Siak Regency, Riau Province | 00° 27′ 03.2″ N | 101° 54′ 03.2 E | | |
| KUD Kebun Sawit Harapan | Gabung Makmur Village, Kerinci Kanan District, Siak Regency, Riau Province | 00° 29′ 10.9″ N | 101° 54′ 36.7″ E | | |
| KUD Buatan Jaya | Jatimulya Village, Kerinci Kanan District, Siak Regency, Riau Province | 00° 31′ 06.8″ N | 101° 53′ 53.0″ E | | |
| KUD Mitra Usaha | Buatan Baru Village, Kerinci Kanan District, Siak Regency, Riau Province | 00° 32′ 02.1″ N | 101° 52′ 56.1″ E | | |
| KUD Makarti Sawit | Buana Makmur Village, Kerinci Kanan District, Siak Regency, Riau Province | 00° 37′ 13.7″ N | 101° 51′ 56.6″ E | | |
| KUD Bina Mulia | Suka Mulia Village, Kerinci Kanan District, Siak Regency, Riau Province | 00° 35′ 08.0″ N | 101° 55′ 25.6″ E | | |
| Note: | | | | | |

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| 5. Description of Supply Base | | | | | | |
|--|--|-------------|-----------------------------------|--------------------|-----------------|--|
| Estate | Total Planted (Mature + Immature) (ha) | HCV (ha) | Infrastructure & Other (ha) | Total Area (ha) | % of Planted | |
| Simpang Perak Estate | 3,082.00 | 35.00 | 42.00 | 3,159.00 | 97.56 | |
| KUD Mulus Rahayu (164 members) | 552.00 | 0.00 | 0.00 | 552.00 | 100.00 | |
| KUD Bhirawa Bhakti (250 members) | 914.00 | 0.00 | 0.00 | 914.00 | 100.00 | |
| KUD Tani Rukun (280 members) | 926.00 | 0.00 | 0.00 | 926.00 | 100.00 | |
| KUD Kebun Sawit Harapan (207 members) | 778.00 | 0.00 | 0.00 | 778.00 | 100.00 | |
| KUD Buatan Jaya (100 members) | 610.00 | 0.00 | 0.00 | 610.00 | 100.00 | |
| KUD Mitra Usaha (314 members) | 1,106.00 | 0.00 | 0.00 | 1,106.00 | 100.00 | |
| KUD Makarti Sawit (229 members) | 798.00 | 0.00 | 0.00 | 798.00 | 100.00 | |
| KUD Bina Mulia (197 members) | 832.00 | 0.00 | 0.00 | 832.00 | 100.00 | |
| Total | 9,598.00 | 35.00 | 42.00 | 9,675.00 | 99.20 | |

Note:

There is a reduction in scheme smallholders with area 662Ha due to has left plasma membership, detailed are: KUD Mulus Rahayu 146Ha from 73 members, KUD Bhirawa Bhakti 82Ha from 41 members, KUD Tani Rukun 26Ha from 13 members, KUD Kebun Sawit Harapan 22Ha from 11 members, KUD Buatan Jaya 250Ha from 125 members, KUD Mitra Usaha 94Ha from 47 members, KUD Makarti Sawit 2Ha from 1 member, KUD Bina Mulia 40Ha from 20 members.

| 6. Plantings & Cycle | | | | | | |
|-------------------------|------------------|--------|---------|-----|--------|----------|
| Estate / Smallholders | Age (Years) - ha | | | | Mature | Immature |
| | 0 - 3 | 4 - 14 | 15 - 25 | >25 | | |
| Simpang Perak Estate | 341 | 2,013 | - | 728 | 2,741 | 341 |
| KUD Mulus Rahayu | - | 376 | - | 176 | 552 | - |
| KUD Bhirawa Bhakti | 8 | 240 | - | 666 | 906 | 8 |
| KUD Tani Rukun | - | - | - | 926 | 926 | - |
| KUD Kebun Sawit Harapan | - | - | - | 778 | 778 | - |
| KUD Buatan Jaya | - | - | - | 610 | 610 | - |

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| Note: - | | | | | | |
|-------------------|-----|-------|---|-------|-------|-----|
| Total (ha) | 349 | 2,821 | 0 | 6,428 | 9,249 | 349 |
| KUD Bina Mulia | - | - | - | 832 | 832 | - |
| KUD Makarti Sawit | - | - | - | 798 | 798 | - |
| KUD Mitra Usaha | - | 192 | - | 914 | 1,106 | - |

| 7. Summary of Certified Tonnage of FFB (Own Certified Scope) | | | | | | |
|--|---|--|---|------------|--|--|
| Estate / | Tonnage / year | | | | | |
| Smallholders | Estimated last year (Aug 2023 – July | Act - July 2023) | Forecast (Aug 2024 – Jul | | | |
| | 2024) | Previous license period (July 2023) | Current license period (Aug 2023 -June 2024) | 2025) | | |
| Simpang Perak Estate | 75,028.00 | 7,109.70 | 57,393.96 | 70,821.00 | | |
| KUD Mulus Rahayu | 9,548.00 | 865.91 | 7,631.35 | 10,100.00 | | |
| KUD Bhirawa Bhakti | 11,625.00 | 737 | 5,796.89 | 15,889.00 | | |
| KUD Tani Rukun | 17,218.00 | 1,591 | 13,563.84 | 19,679.00 | | |
| KUD Kebun Sawit Harapan | 16,992.00 | 1,390 | 11,476.79 | 17,061.00 | | |
| KUD Buatan Jaya | 17,157.00 | 1,355 | 11,713.08 | 18,139.00 | | |
| KUD Mitra Usaha | 17,999.00 | 1,525 | 12,530.12 | 23,605.00 | | |
| KUD Makarti Sawit | 13,040.00 | 1,050 | 9,661.80 | 13,333.00 | | |
| KUD Bina Mulia | 11,998.00 | 1,192 | 11,494.20 | 15,219.00 | | |
| Total | 190,605.00 | 158,0 | 77.64 | 203,846.00 | | |
| Note: There is extension | volume in palmtrace: 47 | ,000MT of FFB, 10,000 | MT of CSPO and 2,303 | MT of CSPK | | |

| | | Tonnag | e / year | |
|--|---|--|---|-----------------------------|
| Estate / Smallholders | Estimated last year (Aug 2023 – July | Actual (July 2023 – June 2024) | | Forecast (Aug 2024 – Jul |
| | 2024) | Previous license period (July 2023) | Current license period (Aug 2023 -June 2024) | 2025) |
| Buatan Estate (Supply Bases Buatan I POM) | 50,913.00 | 4,526 | 48,312.26 | 59,396.00 |
| Total | 50,913.00 | 48,31 | L2.26 | 59,396.00 |

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| 9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) | | | | | |
|---|---|--|---|-----------------------------|--|
| Out growers / smallholders | | Tonnag | je / year | | |
| | Estimated last year (Aug 2023 – July | Actual (July 2023 – June 2024) | | Forecast (Aug 2024 – Jul | |
| | 2024) | 4) Previous license period (July 2023) | Current license period (Aug 2023 -June 2024) | 2025) | |
| Kebun Tanah Kas Desa- 3 | | 605.59 | 14,948.36 | | |
| Total 15,553.95 | | | | | |
| 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 | July 2023 | 21,334.68 | 605.59 | 21,940.27 | | |
| 2 | August 2023 | 21,282.71 | 1,862.82 | 23,145.53 | | |
| 3 | September 2023 | 17,762.11 | 1,991.04 | 19,753.15 | | |
| 4 | October 2023 | 18,128.00 | 1,897.89 | 20,025.89 | | |
| 5 | November 2023 | 18,353.10 | 1,852.87 | 20,205.97 | | |
| 6 | December 2023 | 17,432.95 | 1,593.28 | 19,026.23 | | |
| 7 | January 2024 | 16,270.57 | 1,553.40 | 17,823.97 | | |
| 8 | February 2024 | 14,516.18 | 1,353.80 | 15,869.98 | | |
| 9 | March 2024 | 14,712.84 | 1,404.64 | 16,117.48 | | |
| 10 | April 2024 | 17,711.98 | 1,367.85 | 19,079.83 | | |
| 11 | May 2024 | 14,920.04 | 41.95 | 14,961.99 | | |
| 12 | June 2024 | 13,964.74 | 28.82 | 13,993.56 | | |
| | TOTAL | 206,389.90 | 15,553.95 | 221,943.85 | | |

Note:

- There is extension volume in palmtrace: 47,000MT of FFB, 10,000MT of CSPO and 2,303MT of CSPK

 Actual of FFB from Buatan Estate – Supply Bases Buatan I POM in July 2023 – June 2024 is 48,312.26 MT, so the total is 206,389.90MT

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| 10.Summary of Certified Tonnage (not applicable for ISS) | | | | | | |
|--|--|---|------------------|--|--|--|
| Estimated last year (Aug 2023 - July 2024) | | Actual (July 2023 – June 2024) | | | | |
| | Previous license period (July 2023) | Current license period (Aug 2023 -June 2024) | | | | |
| FFB | FI | FFB | | | | |
| 237,605.00 mt | 21,334.68 mt | 185,055.22 mt | 263,242.00* mt | | | |
| 237,003.00 mt | TOTAL | 206,389.90 mt | 203,242.00 Int | | | |
| CPO (OER: 18.09 %) | CPO (OER: | CPO (OER: 20.83 %) | | | | |
| 42 002 72 mt | 4,305.81 mt | 38,687.89 | E4 227 0E* mb | | | |
| 42,993.73 mt | TOTAL | 42,993.70 mt | 54,227.85* mt | | | |
| PK (KER: 4.74 %) | PK (KER: | 4.58 %) | PK (KER: 4.70 %) | | | |
| 11 OC1 44 mb | 877.55 mt | 8,584.78 mt | | | | |
| 11,261.44 mt | TOTAL | 9,462.33 mt | 12,372.37* mt | | | |

Note:

- There is extension volume in palmtrace: 47,000MT of FFB, 10,000MT of CSPO and 2,303MT of CSPK.

Actual of FFB from Buatan Estate – Supply Bases Buatan I POM (Certificate Number RSPO 638918) in July 2023 – June 2024 is 48,312.26 MT, so the total is 206,389.90MT; Actual of CSPO from Buatan Estate in period July 2023 – June 2024 is 10,042.03MT total 42,993.70 MT and CSPK from Buatan Estate July 2023 – June 2024 is 2,216.24MT total 9,462.33MT.

 *) For the forecast (Aug'24-Jul'25) has been added from Buatan Estate – Supply Bases Buatan I POM (forecast Table 7 + forecast Table 8)

| 10A. | 10A. Monthly Records of Certified CPO & PK since the last audit | | | | | | | |
|------|---|--------------------|-------------------|--|--|--|--|--|
| No. | Month - Year | Certified CPO (mt) | Certified PK (mt) | | | | | |
| 1 | July 2023 | 4,305.81 | 877.55 | | | | | |
| 2 | August 2023 | 4,080.38 | 975.75 | | | | | |
| 3 | September 2023 | 3,683.36 | 807.10 | | | | | |
| 4 | October 2023 | 3,881.29 | 858.51 | | | | | |
| 5 | November 2023 | 3,877.73 | 877.19 | | | | | |
| 6 | December 2023 | 3,690.35 | 800.79 | | | | | |
| 7 | January 2024 | 3,391.96 | 751.94 | | | | | |
| 8 | February 2024 | 3,004.94 | 666.66 | | | | | |
| 9 | March 2024 | 3,152.90 | 690.48 | | | | | |
| 10 | April 2024 | 3,909.67 | 850.42 | | | | | |

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| 11 | May 2024 | 3,170.09 | 702.74 |
|----|-----------|-----------|----------|
| 12 | June 2024 | 2,845.22 | 603.20 |
| | TOTAL | 42,993.70 | 9,462.33 |

Note:

- There is extension volume in palmtrace: 47,000MT of FFB, 10,000MT of CSPO and 2,303MT of CSPK.

Actual of FFB from Buatan Estate – Supply Bases Buatan I POM (Certificate Number RSPO 638918) in July 2023 – June 2024 is 48,312.26 MT, so the total is 206,389.90MT; Actual of CSPO from Buatan Estate in period July 2023 – June 2024 is 10,042.03MT total 42,993.70 MT and CSPK from Buatan Estate July 2023 – June 2024 is 2,216.24MT total 9,462.33MT.

| Current Licens | | | | | | | | | | |
|------------------|---|-------------------------|--------|----------------|-----------|--|--|--|--|--|
| Surrent Electric | Current License period (Aug 2023 -June 2024) | | | | | | | | | |
| | DCDO Castified | Other Schemes Certified | | | | | | | | |
| | RSPO Certified | ISCC | Others | - Conventional | Total | | | | | |
| CPO (MT) | 20,202.80 | 2,394.41 | 0 | 0 | 22,597.21 | | | | | |
| PK (MT) | 6,975.20 | 0 | 0 | 0 | 6,975.20 | | | | | |
| Credits | 0 | 0 | 0 | 0 | 0 | | | | | |
| Previous Licer | nse period (July 20 | 23) | | · · · · · | | | | | | |
| CPO (MT) | 2,231.74 | 0 | 0 | 0 | 2,231.74 | | | | | |
| PK (MT) | 0 | 0 | 0 | 0 | 0 | | | | | |
| Credits | 0 | 0 | 0 | 0 | 0 | | | | | |

| 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 IIS – Buatan I KCP | RSPO_PO1000002758 | - | 6,975.20 | | | |
| 2 | PT Sari Dumai Sejati | RSPO_PO1000014154 | 22,434.54 | - | | | |
| | | TOTAL | 22,434.54 | 6,975.20 | | | |
| Note: | | | | | | | |

| 11B. | 11B. Records of CPO & PK Sold under other schemes since the last audit (if any) | | | | | | |
|------|---|------|-------------------------------|---|--|--|--|
| No. | No. Buyers Name Scheme Name | | CPO Sold PK Sold (mt) (mt) | | | | |
| 1 | PT Sari Dumai Sejati | ISCC | 2,394.41 | - | | | |

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| | TOTAL | 2,394.41 | - |
|-------|-------|----------|---|
| Note: | | | |

| 11C. Re | 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 (key in period) | | Actual (key in period) | | | Forecast (key in period) | | | |
| Dhace | Eligibility | MS A | MS B | Eligibility | MS A | MS B | Eligibility | MS A | MS B |
| Phase | 40% | 70% | 100% | 40% | 70% | 100% | 40% | 70% | 100% |
| FFB | | | N/A | | | N/A | | | N/A |
| IS-CSPO | - | - | | - | - | | - | - | |
| IS-CSPKO | - | - | | - | - | | - | - | |
| IS-CSPKE | - | - | | - | - | | - | - | |
| CSPK | - | - | | - | - | | - | - | |

| 12A. | 12A. Monthly Records of Certified CPO, PK & PKE (equivalent) produced since the last audit | | | | | | | | |
|--|--|---|---|---|---|-----------------------|--|--|--|
| No.Month - YearFFB (MT)Certified CPO (MT)Certified PK (MT)Certified PKO (MT)Certified PKO (MT) </th <th>Certified PKE (MT)</th> | | | | | | Certified PKE (MT) | | | |
| | NIL | - | - | - | - | - | | | |
| | | | | | | | | | |
| TOTAL | | | | | - | | | | |
| Note | 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 Li | cense period (k | ey in period) | | | | | | | |
| Credits | | | | - | - | - | - | | |
| Physical | - | - | - | | | | | | |
| Previous L | Previous License period (key in period) | | | | | | | | |
| Credits | | | | - | - | - | - | | |
| Physical | - | - | - | | | | | | |

| 13A. | 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) | CPO Sold | Certified PK Sold (MT/credit) | PKO Sold | Certified PKE Sold (MT/credit) | | |
| | NIL | - | - | - | - | - | - | | |
| | | | | | | | | | |
| | TOTAL | | | | | | | | |
| Note | 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. Tel +60 (3) 9212 9638; Fax +60 (3) 9212 9639 Representative: Dr. Chaiyaporn Seekao (<u>Chaiyaporn.Seekao@bsigroup.com</u>) Website: <u>www.bsigroup.com</u>

BSI is a leading global provider of management systems assessment and certification, with more than 92,000 certified locations and clients in over 193 countries. BSI is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (ASI-ACC-067) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia.

2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on *27, 29-31 July and 01-02 Aug 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 **14/09/2024**. 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.

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 (ASA 2_1) | Year 3 (ASA 2_2) | Year 4 (ASA 2_3) | Year 5 (ASA 2_4) | | |
| Buatan II Palm Oil Mill | x | x | x | x | x | | |
| Simpang Perak Estate | x | x | x | x | x | | |
| KKPA Delima Sakti* | X | X | | | | | |
| KUD Mulus Rahayu | X | X | x | | x | | |
| KUD Bhirawa Bhakti | X | | x | x | | | |
| KUD Tani Rukun | | X | | x | | | |
| KUD Kebun Sawit Harapan | X | | x | | x | | |
| KUD Buatan Jaya | X | | x | | x | | |
| KUD Mitra Usaha | | X | | x | | | |
| KUD Makarti Sawit | | X | | x | | | |
| KUD Bina Mulia | | | | | X | | |

*KKPA Delima Sakti out of scope started from CAV 2.2 (audit in 2023) due to their participation in RSPO ISH Certification

Tentative Date of Next Visit: July 6, 2025 - July 12, 2025

Total Number of Mandays: 26.5 mandays

2.2 BSI Assessment Team

| Name | Role | Competency |
|------------------------|-------------|--|
| Nanang Rusmana (NR) | Team Leader | Education: Holds a Bachelor Degree of Forestry, Bogor Agricultural University (IPB) |
| | | 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 auditor |
| | | 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, SMR3 Auditor Course, HCV Assessor Course, General OHS Expert Course, SMR3 Auditor Course, HCV Language proficiency: Fluent in Bahasa Indonesia and English Aspect covered in this audit: © Goid ⊂ Environmental Market Communication and claim requirements ISH context (ICS, internal audit, policy, business planning and trading system) Eko Prastio Ramadhan (EPR) Team Member Eko Prastio Bid Course, HCV Years of working experience in biodiversity officer Work Experience: Over 4 years of working experience in biodiversity officer Work Experience: Over 4 years of working experience in biodiversity officer Work Experience: Over 4 years of working experience in biodiversity officer Work Experience: Over 4 years of working experience in biodiversity officer Work Experience: Over 4 years of working experience in biodiversity officer Work Experience: Over 4 years of working experience in biodiversity officer Work Experience: Over 4 years of working experience in biodiversity officer Work Experience: Over 4 years of working experience in biodiversity officer Work Experience: Over 4 years of working experience in biodiversity officer Work Experience: Over 4 years of working experience in biodiversity experience Ordin Cov | | | | | |
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| Mujinlus Jalaraya Team Member Education: Holds a Bachelor Degree majoring in Forest Resources Conservation and Ecotourism from Forestry Faculty, Bogor Agricultural University (IPB). Work Experience: Over 4 years of working experience in bioliversity officer with Birdlife Indonesia and consultant with PT Inao Konsultindo. Over 2½ years of working experience in bioliversity officer with Birdlife Indonesia and consultant with PT Inao Konsultindo. Over 2½ years of working experience in specification Program Manager and auditor covering standard such as RSPO P&C Certification Program Manager and auditor covering standard such as RSPO P&C Certification Program Manager and auditor covering standard such as RSPO P&C Certification Program Manager and auditor covering standard such as RSPO P&C Certification Program Manager and auditor covereing standard such as RSPO P&C Certification Program Manager and auditor covereing standard such as RSPO P&C Certification Program Manager and auditor covereing standard such as RSPO P&C Certification Program Manager and auditor covereing standard such as RSPO P&C Certification Program Manager and auditor covereing standard such as RSPO P&C Certification Program Manager and auditor covereing standard such as RSPO P&C Calditor Lead Auditor Course, ISPO Auditor Batch 19 Training, Endorsed RSPO SCC Auditor Lead Auditor Course, ISPO Auditor Batch 19 Training. Mujinlus Jalaraya Team Member Education: Holds a Bachelor Degree majoring in Forest Resources Conservation and Ecotourism, Bogor Agricultural University (IPB). Work Experience: 6 years working experience in palm oil plantations as SHE Assistant at PT. Astra Agro Leatari Tbk and Sustainability Supervisor at Teladan Prima Group. 8 years working experience as RSPO Auditor course, Endorsed RSPO SOC Lead Auditor cour | | Language proficiency: Fluent in Bahasa Indonesia and English | | | |
| Bioline Bioxial Environmental Market Communication and claim requirements Bist context (ICS, internal audit, policy, business planning and trading system) System Team Member Eko Prastio Team Member Education: Holds a Bachelor Degree in Forest Resources Conservation and Ecotourism from Forestry Faculty, Bogor Agricultural University (IPB). Work Experience: Over 4 years of working experience in biodiversity officer With Birdlife Indonesia and consultant with PT Inoa Konsultindo. Over 2½ years of working experience as RSPO P&C certification Program Manager and auditor covering standard such as RSPO P&C certification Program Manager and auditor covering standard such as RSPO P&C. CRSPO SICCS, ISPO, ISO 9001, ISO 45001 and ISO 14001. Training, Entorsed RSPO SSC Cauditor Lead Auditor Course, Endorsed RSPO P&SC CRSPO SCC3 Impact Assessment Training, Entorsed RSPO SSC Cauditor Lead Auditor Course, ISPO Auditor Batch 19 Training, ISO 9001 Lead Auditor Course, SISO Auditor Batch 19 Training, ISO 9001 Lead Auditor Course, SISO Auditor Batch 19 Training, ISO 9001 Lead Auditor Course, ISPO Auditor Batch 19 Training, ISO 9001 Lead Auditor Course, ISPO Auditor Batch 19 Training, ISO 9001 Lead Auditor Course, ISPO Auditor Batch 19 Training, ISO 9001 Lead Auditor Course, ISPO Auditor Batch 19 Training, ISO 9001 Lead Auditor Course, ISPO Auditor Course, ISPO Auditor Course, ISPO Auditor ISO 4001 and Equirements Mujinius Jalaraya Team Member Education: Holds a Bachelor Degree majoring in Forest Resources Conservation and Ecotourism, Bogor Agricultural University (IPB). Work Experience: 6 years working ex | | Aspect covered in this audit: | | | |
| Eko Prastio Ramadhan (EPR) Team Member Education: Holds a Bachelor Degree in Forest Resources Conservation and Ecotourism from Forestry Faculty, Bogor Agricultural University (IPB). Work Experience: Over 4 years of working experience in biodiversity officer with Birdlife Indonesia and consultant with PT Inaa Konsultando. Over 2½ years of working experience in palm oil estate with PT Salim Ivomas Pratama Tbk and Capitol Plantation Group implementing sustainability. Over 4½ years of working experience in palm oil estate with PT Salim Ivomas Pratama Tbk and Capitol Plantation Group implementing sustainability. Over 4½ years of working experience as RSPO P&C Certification Program Manager and auditor covering standard such as RSPO P&C, RSPO SCCS, ISPO, ISO 9001, ISO 45001 and ISO 14001. Training attended: Completed ISO 14001:2015 Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, Social Impact Assessment Training, Endorsed RSPO P&C Cauditor Lead Auditor Course, ISPO Auditor Batch 19 Training, ISO 9001 Lead Auditor Course, and Identification of HCV Areas Training. Language proficiency: Fluent in Bahasa Indonesia and English Aspect covered in this audit: Good Agriculture Practice = Health and Safety = Supply chain requirements ISH context (ICS, internal audit, policy, business planning and trading system) Mujinius Jalaraya Team Member Education: Holds a Bachelor Degree majoring in Forest Resources Conservation and Ecotourism, Bogor Agricultural University (IPB). Work Experience: 6 years working experience in palm oil plantations as SHE Assistant at PT. Astra Agro Lead Auditor course, ISPO Auditor Ju | | ☑ Good Agriculture Practice □ Health and Safety □ Supply chain requirements | | | |
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| Image: Construct of Construction and Ecotourism, Bogor Agricultural University (IPB).Mujinius Jalaraya (MJ)Team MemberEducation: Holds a Bachelor Degree majoring in Forest Resources Conservation and Ecotourism, Bogor Agricultural University (IPB).Work Experience: 6 years working experience in palm oil plantations as SHE Assistant at PT. Astra Agro Lestari Tbk and Sustainability Supervisor at Teladan Prima Group. 8 years working experience as RSPO Auditor / Lead Auditor.Training attended: Completed ISO 9001 Lead Auditor course, ISPO Lead Auditor course, Endorsed RSPO P&C Lead Auditor course, Endorsed RSPO SCCS Lead Auditor course, Introductory Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation, ISO 14001 Internal Auditor Training, ISO 45001 Lead Auditor course, OHS Expert Training, SMETA Requirements Training Language proficiency: Fluent in Bahasa Indonesia and English Aspect covered in this audit: □ Good Agriculture Practice □ Health and Safety ⊠ Supply chain requirements | | □ Good Agriculture Practice □ Health and Safety □ Supply chain requirements | | | |
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| SHE Assistant at PT. Astra Agro Lestari Tbk and Sustainability Supervisor at Teladan Prima Group. 8 years working experience as RSPO Auditor / Lead Auditor. Training attended: Completed ISO 9001 Lead Auditor course, ISPO Lead Auditor course, Endorsed RSPO P&C Lead Auditor course, Endorsed RSPO SCCS Lead Auditor course, Introductory Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation, ISO 14001 Internal Auditor Training, ISO 45001 Lead Auditor course, OHS Expert Training, SMETA Requirements Training Language proficiency: Fluent in Bahasa Indonesia and English Aspect covered in this audit: □ Good Agriculture Practice □ Health and Safety ⊠ Supply chain requirements | Team Member | | | | |
| Auditor course, Endorsed RSPO P&C Lead Auditor course, Endorsed RSPO SCCS Lead Auditor course, Introductory Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation, ISO 14001 Internal Auditor Training, ISO 45001 Lead Auditor course, OHS Expert Training, SMETA Requirements Training Language proficiency: Fluent in Bahasa Indonesia and English Aspect covered in this audit: □ Good Agriculture Practice □ Health and Safety ⊠ Supply chain requirements | | SHE Assistant at PT. Astra Agro Lestari Tbk and Sustainability Supervisor at | | | |
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| \Box Good Agriculture Practice \Box Health and Safety \boxtimes Supply chain requirements | | Auditor. Training attended: Completed ISO 9001 Lead Auditor course, ISPO Lead Auditor course, Endorsed RSPO P&C Lead Auditor course, Endorsed RSPO SCCS Lead Auditor course, Introductory Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation, ISO 14001 Internal Auditor Training, ISO 45001 Lead Auditor course, OHS Expert Training, | | | |
| | | Auditor. Training attended: Completed ISO 9001 Lead Auditor course, ISPO Lead Auditor course, Endorsed RSPO P&C Lead Auditor course, Endorsed RSPO SCCS Lead Auditor course, Introductory Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation, ISO 14001 Internal Auditor Training, ISO 45001 Lead Auditor course, OHS Expert Training, SMETA Requirements Training | | | |
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RSPO P&C Public Summary Report Revision 15 (Nov 2023)

| | | $\hfill\square$ ISH context (ICS, internal audit, policy, business planning and trading system) |
|-----------------|-------------|--|
| Edy Widodo (EW) | Team Member | Education: Holds a Bachelor Degree majoring Agricultural Technology from University of Padjadjaran, Bandung. |
| | | Work Experience: 8 years working experience in palm oil industry as Agronomist and Assistant Manager in various companies. 9 year working experience as RSPO/ISPO auditor. |
| | | Training attended: Completed ISO 9001 Lead Auditor Course, ISPO endorsed auditor course, Understanding ISO 14001 training, Auditing ISO 14001: 2004 training, Endorsed RSPO Supply Chain Certification Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, SMETA Requirements Training, Introductory Course for High Conservation Value and High Carbon Stock (HCS) in Oil Palm Plantation. |
| | | Language proficiency: Fluent in Bahasa Indonesia and English |
| | | Aspect covered in this audit: |
| | | \Box Good Agriculture Practice \Box Health and Safety \Box Supply chain requirements |
| | | \boxtimes Social \square Environmental \square Market Communication and claim requirements |
| | | \square ISH context (ICS, internal audit, policy, business planning and trading system) |
| Sansan Suhendar | Team Member | Education: |
| | | Hold a Bachelor Degree in Forest Product Technology from Forest faculty – Bogor Agricultural University (IPB) |
| | | Work Experience: |
| | | OHS staff at PT. Astra Agro Lestari (PT. Sumber Kharisma Persada and PT. Sari Aditya Loka 1), RSPO and ISPO Auditor at PT. SAI Global Indonesia, RSPO and ISPO Auditor at PT. Mutuagung Lestari, RSPO and ISPO Lead Auditor at PT. SGS Indonesia, RSPO & ISPO Lead Auditor at PT. TUV Rheinland Indonesia and RSPO & ISPO Lead Auditor at PT. BSI - current. |
| | | Training attended: |
| | | RSPO Lead Auditor Training, ISPO Lead Auditor Training (ISPO Commission), ISO 9001 Lead Auditor Training, ISO 45001 Lead Auditor Training, ISO 14001 Lead Auditor Training, HCV training, GHG training, HACCP training, General OHS Expert training and RSPO Lead Auditor Standard 2018 Refreshment Training (2023). |
| | | Language proficiency: |
| | | Fluent in Bahasa Indonesia and English |
| | | Aspect covered in this audit: |
| | | \Box Good Agriculture Practice \boxtimes Health and Safety \Box Supply chain requirements |
| | | |
| | | \Box Social \boxtimes Environmental \Box Market Communication and claim requirements |



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 | MJ | EP | EW D | SS |
|---------------------------|---------------|---|--------------|--------------|--------------|--------------|--------------|
| Saturday, 27 July 2024 | 08.00 – 09.00 | Opening Meeting Presentation by PT. IIS – Buatan II POM, Estate and Smallholder Presentation by BSI Indonesia | \checkmark | V | \checkmark | \checkmark | \checkmark |
| | 09.00 – 12.00 | Field Visit to Simpang Perak Estate Herbicide application programmes, harvesting, fertilizing operations, water management, road maintenance, terracing, HCV's, riparian zones, etc. Agrochemical stores, Fertilizer store, workshops, housing, landfill, clinic, riparian zones, Hazardous Waste, waste management, etc. Boundaries inspection, worker interviews, social amenities, etc. | V | V | V | √ | √ |
| | 12.00 - 14.00 | Break | \checkmark | \checkmark | \checkmark | \checkmark | \checkmark |

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| Date | Time | Subjects | NR | МЈ | EP | EW D | SS |
|-----------------------|---------------|---|--------------|--------------|--------------|--------------|--------------|
| | 14.00 – 16.30 | Field Visit to Buatan II POM Occupational Health and Safety, Environment Aspect. Social Aspect and workers welfare, workers interview Best Management Practice for Mill and supply chain for mill. Field implementation for Operation Procedure. 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, | V | √ | √ | ~ | |
| | 14.00 – 16.30 | Document review, etc. Public Consultation (Internal) Union Labour Koperasi Karyawan Gender committee | | | | √ | |
| Sunday, 28/07/2024 | 16.30 - 17.00 | Wash-up meeting Stay Onsite | | \checkmark | √ √ | √ √ | |
| Monday, 29/07/2024 | 08.00 - 12.00 | Field Visit to Scheme Smallholder KUD Tani Rukun Field visit to Kavling/Block member of Smallholder to verify conformity with RSPO INA NI 2020 Standard, BMP, OHS-EMS Implementation, HCV, Social and Labor, Continual improvement, etc. | V | V | V | - | V |
| | 08.00 - 12.00 | Public consultation (external) Governance body NGO Local government | | | | V | |
| | 12.00 - 14.00 | Break | \checkmark | \checkmark | \checkmark | \checkmark | \checkmark |

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| Date | Time | Subjects | NR | МЈ | EP | EW D | SS |
|--------------------------|---------------|--|--------------|--------------|--------------|--------------|--------------|
| | 14.00 - 16.30 | Document Review for PT. IIS – Buatan II POM, Estate and Smallholder | V | V | \checkmark | \checkmark | \checkmark |
| | 16.30 – 17.00 | Wash-up Meeting | \checkmark | \checkmark | \checkmark | \checkmark | \checkmark |
| Tuesday, 30/07/2024 | 08.00 - 12.00 | Field Visit to Scheme Smallholder KUD Makarti Sawit | V | V | \checkmark | | \checkmark |
| | | Field visit to Kavling/Block member of Smallholder to verify conformity with RSPO INA NI 2020 Standard, BMP, OHS-EMS Implementation, HCV, Social and Labor, Continual improvement, etc. | | | | | |
| | 08.00 - 12.00 | Document Review for PT. IIS – Buatan II POM, Estate and Smallholder and Interview Worker | | | | V | |
| | 12.00 - 14.00 | Break | \checkmark | \checkmark | \checkmark | \checkmark | \checkmark |
| | 14.00 – 16.30 | Document Review for PT. IIS – Buatan II POM, Estate and Smallholder | \checkmark | \checkmark | \checkmark | \checkmark | \checkmark |
| | 16.30 – 17.00 | Wash-up Meeting | \checkmark | \checkmark | \checkmark | \checkmark | \checkmark |
| Wednesday, 31/07/2024 | 08.00 – 12.00 | Field Visit to Scheme Smallholder KUD Bhirawa Bhakti Field visit to Kavling/Block member of Smallholder to verify conformity with RSPO INA NI 2020 Standard, BMP, OHS-EMS Implementation, HCV, Social and Labor, Continual improvement, etc. | V | ~ | ~ | | \checkmark |
| | 08.00 - 12.00 | Document Review for PT. IIS – Buatan II POM, Estate and Smallholder and Interview Worker | | | | \checkmark | |
| | 12.00 - 14.00 | Break | \checkmark | \checkmark | \checkmark | \checkmark | \checkmark |
| | 14.00 – 16.30 | Document Review for PT. IIS – Buatan II POM, Estate and Smallholder | \checkmark | \checkmark | \checkmark | \checkmark | \checkmark |
| | 16.30 – 17.00 | Wash-up Meeting | \checkmark | \checkmark | \checkmark | \checkmark | \checkmark |

RSPO P&C Public Summary Report Revision 15 (Nov 2023)

| Date | Time | Subjects | NR | MJ | EP | EW D | SS |
|-------------------------|---------------|---|--------------|--------------|--------------|--------------|--------------|
| Thursday, 01/08/2024 | 08.00 - 12.00 | Field Visit to Scheme Smallholder KUD Mitra Usaha | \checkmark | \checkmark | \checkmark | | \checkmark |
| | | Field visit to Kavling/Block member of Smallholder to verify conformity with RSPO INA NI 2020 Standard, BMP, OHS-EMS Implementation, HCV, Social and Labor, Continual improvement, etc. | | | | | |
| | 08.00 - 12.00 | Document Review for PT. IIS – Buatan II POM, Estate and Smallholder and Interview Worker | | | | \checkmark | |
| | 12.00 - 14.00 | Break | \checkmark | \checkmark | \checkmark | \checkmark | \checkmark |
| | 14.00 – 14.30 | Document Review for PT. IIS – Buatan II POM, Estate and Smallholder | \checkmark | \checkmark | \checkmark | \checkmark | \checkmark |
| | 14.30 – 16.00 | Wash-up Meeting | \checkmark | \checkmark | \checkmark | \checkmark | \checkmark |
| Friday, 02/08/2024 | 08.00 - 11.00 | Document Review for PT. IIS – Buatan II POM, Estate and Smallholder | \checkmark | \checkmark | \checkmark | \checkmark | \checkmark |
| | 11.00 - 12.00 | Auditors discussion /preparation for closing meeting | \checkmark | \checkmark | \checkmark | \checkmark | \checkmark |
| | 12.00 - 14.00 | Break | \checkmark | \checkmark | \checkmark | \checkmark | \checkmark |
| | 14.00 - 15.30 | Closing Meeting | \checkmark | \checkmark | \checkmark | \checkmark | \checkmark |

NCR Close out Visit Assessment Plan

| Date | Time | Subjects | МЈ | | | | |
|----------------|---|---|--------------|--|--|--|--|
| Saturday, | 08.00 - 09.00 | Opening meeting | \checkmark | | | | |
| 14/09/2024 | 09.00 - 12.00 | Field verification | \checkmark | | | | |
| | 12.00 - 14.00 | Break | \checkmark | | | | |
| | 14.00 - 16.00 | Document verification, interview with workers | \checkmark | | | | |
| | 16.00 – 17.00 | Closing Meeting | \checkmark | | | | |
| Note: NCR Clos | Note: NCR Close Out Visit has carried out by Mujinius Jalaraya (MJ) | | | | | | |

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 the template as announced by the RSPO | No, there is no new acquisition conducted by PT Inti Indosawit Subur and its subsidiary. | Complied |
| Secretariat on 21/12/2021. | | |
| Any deviations from the maximum periods requires approval by the RSPO Secretariat. | Yes, there is time bound plan revision dated 19 April 2023, signed by Management Representative. Justification available, it caused: | Complied |
| | • 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. | |

| | |] |
|--|--|----------|
| | Revision of TBP has been approved by RSPO on 19/04/2023. | |
| Have there been any changes to the time- bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting? | Yes, there is time bound plan revision dated 19 April 2023, signed by Management Representative. Justification available, it caused: 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. | Complied |
| Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised | 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 : 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. | Complied |



| Have there been any fundamental failure (e.g. | There is no fundamental failure to proceed with | Complied |
|---|--|----------|
| unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance | 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. | |
| shall be raised | 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. | |
| Un-Certified Units or Holdings | | |
| No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12. | According to Land Use change analysis, there are several area conversion cacao plantation in Bahilang Estate and Sentral Estate, no primary forest. 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. | Complied |
| | 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. | |
| | Update for Sentral Estate : Concept Note still on Progress and submitted to RaCP team at Q2 2023. | |
| | 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. Revision of TBP has been approved by RSPO on | |
| Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure. | 19/04/2023. According to Land Use change analysis, there are several area conversion cacao plantation in Bahilang Estate and Sentral Estate, no primary forest. 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 | Complied |

| | 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. | |
|--|--|----------|
| Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8. | According to internal audit result on December 2020, there is no land conflict occur in PT Mitra Unggul Pusaka – Segati Mill. In addition, the company has been certified for ISPO (Indonesian Sustainable Palm Oil) since December 2016. 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: 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 Remediation Plan required (MUs): 4 units Remediation Plan submitted (MUs): 1 Remediation Plan approved (MUs): 0 | Complied |
| Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2 | 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. Update on internal audit: 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 |

| | 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. | |
|---|---|----------|
| | There are no ongoing case/s of grievances or complaint based on RSPO Complaint tracker (<u>https://askrspo.force.com/Complaint/s/casetracker</u>) | |
| Any Legal non- compliance is being addressed through measures consistent with the | Internal audit was conduct frequently in annual basis. | Complied |
| requirements of RSPO P&C criteria 2.1 | 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. | |
| | Update on internal audit: | |
| | • 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 | |
| Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified. | Internal audit was conduct frequently in annual basis. 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. Update on internal audit: • Topaz was on 31 October - 04 November 2023 • Teluk Panji was on 06-11 November 2023 • Sentral Estate was on 08-16 August 2023 • Sentral Estate was on 08-16 August 2023 • Bahilang Estate was on 14-19 August 2023 Report of internal audit are available. Result of internal audit: • 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. No new plantings are established on local people's land and no HCV area replacement. | Complied |

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| | | 1 |
|--|---|----------|
| 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? | 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. 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: 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 Remediation Plan required (MUs): 4 units Remediation Plan submitted (MUs): 1 Remediation Plan submitted (MUs): 1 Remediation Plan approved (MUs): 0 | Complied |
| Have there been any stakeholder (including NGO) consultation conducted? | During internal audit stakeholders consultation already conducted. There is no issue. Update on internal audit: • Topaz was on 31 October - 04 November 2023 | Complied |
| | Teluk Panji was on 06-11 November 2023 | |
| | Sentral Estate was on 08-16 August 2023 | |
| | Bahilang Estate was on 14-19 August 2023 | |

3.2 Progress of scheme smallholders and/or outgrowers

| Progress of scheme smallholders or outgrowers towards compliance with relevant standards | | | | | | | |
|--|--|------------|--|--|--|--|--|
| Requirement | Remarks | Compliance | | | | | |
| Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification? 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. | Yes, PT Inti Indosawit Subur Group has including 100% the scheme smallholder in their certification. | Complied | | | | | |



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 | | Buatan Estate | Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau | 2010 | Certified on 16 September 2010 Re-Certified on 16 September |
| | | Buatan (Plasma) | Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau | | 2015 Re-certified in 2020-2021 |
| Buatan II Mill - PT Inti Indosawit Subur | Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, | Simpang Perak Estate* | Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau | 2010 | Certified on 16 September 2010 Re-Certified on 16 September |
| | Riau | Buatan (Plasma) | Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau | | 2015 *Split From Buatan Estate Since 1 January 2019 Re-certified in 2020-2021 |
| 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 |



| 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 |
| | Ridu | 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 | Segati Estate | Langkan / Penarikan / Tambak / Sotol Village, Langgam District, Pelalawan Regency, Riau | 2022 | Certified on 1 November 2022 |
| | Regency, Riau | 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 |



| 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 Sumatra | 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 Sumatra | Aek Nabara Estate | S1-S3 / Sukadame Village, Bilah Hulu / Kota Pinang District, Labuhan Batu Regency, North Sumatra | 2015 | Certified on 6 March 2015 Re-certified in 2020 |
| Teluk Panjie Mill — PT Supra Matra Abadi | Teluk Panjie Village, Kampung Rakyat District, | Teluk Panjie Estate (3,885 Ha) | Teluk Panjie Village, Kampung Rakyat District, Labuhan Batu Regency, North Sumatra | 2015 | Certified on 21 April 2015 Re-certified in 2020 |
| | Labuhan Batu Regency, North Sumatra | Teluk Panjie Estate (801 Ha) | | 2026 | HGU is still in Process |
| Peranap Mill — PT Rigunas Agri Utama | Sengkilo Village, Peranap | Peranap Estate | Simelinyang / Pauh Ranap / Sengkilo Village, Peranap District, | 2015 | Certified on 7 January 2015 Re-certified in 2020 |
| District, Indragiri Hulu Regency, Riau | Peranap (Plasma) | Indragiri Hulu Regency, Riau | 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 | 2015 | Certified on 3 December 2015 |
| | | | District, Bungo Tebo Regency, Jambi | | Re-certified in 2020 |
| | - | Bungo Tebo (Plasma) | | 2017 | Certified on 7 February 2017 |

...making excellence a habit."



| 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 | 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 |
| | Regency, North Sumatra | 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 | Certified on 23 December 2016 as Independent Mill Audit in 2016 as Mill and Supply Base Re-certified in 2021 |
| | (2,088 Ha) District, Labuhan Batu Regence | Aek Korsik Village, Aek Natas District, Labuhan Batu Regency, North Sumatra | 2018 | Certified in 2018 | |
| | | Aek Kuo | | 2018 | |



| 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 | excluded from scope of | Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra | 2015 | 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 one (1) Critical; two (2) of Minor nonconformities and zero (0) of OFI Opportunity For Improvement raised. The PT Inti Indosawit Subur – Buatan II 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 # | 2529297-202407-M1 | Issued Date | 02/08/2024 |
| Due Date | 01/11/2024 | Closure Date | 14/09/2024 |
| Indicator & Category (Critical / Minor) | Critical 6.2.3 | | |
| Statement of Nonconformity: | There are determinations related to employment that are not in accordance with applicable regulations and legislation | | |
| Requirement Reference: | (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. | | |
| Objective Evidence: | | | |

| | | And then, according to the regulations of PP 36/2021 Article 39 "Overtime wages must be paid by companies that employ workers over working time on weekly breaks or on official holidays, but in the memorandum it is stated: - No. 39. Load TBS; Sundays/Holidays 131,505 per HK and 109,587 per HK. |
|------------------------|----|---|
| | | No. 55. Edda 165, 501003/5101003/5 151,505 per filk and 105,507 per filk. |
| | 3. | Based on the payroll/wage list of Simpang Perak Estate workers for the period January – June 2024, it was known that there are Daily Worker/PHL workers who have not been registered as Pension Guarantee participants, namely out of 20 samples of Daily Wokers workers, it was verified that 15 workers have not registered for Pension Guarantee. This is not in accordance with PP No. 45/2015 concerning the Implementation of Pension Security. |
| Corrections: | - | Issued a memorandum that confirms break times and socializes it to employees. |
| | - | Conduct an evaluation of the premium determination in the memorandum in accordance with applicable regulations and conduct detailed justification regarding the premium determination in the memorandum. |
| | - | Providing socialization regarding pension insurance to employees and gradually registering pension insurance participants for employees. |
| Root Cause Analysis: | - | There has never been any socialization of outsourcing employees regarding the regulations on working hours and rest/break hours in accordance with Law No. 13/2003. |
| | - | The absence of detailed justification regarding the determination of premiums in the premium determination memorandum. |
| | - | Lack of employee understanding regarding the BPJS Pension Guarantee program due to the assumption that employees only add deductions to their salaries |
| Corrective Actions: | - | Schedule the socialization of the break time memorandum at least once a year. |
| | - | Carry out monitoring of the premium determination justification periodically at least once a year. |
| | - | Monitoring the gradual registration program for plantation employees |
| Assessment Conclusion: | | PT IIS Buatan II POM and Estate has issued a memorandum that confirms break times; Memorandum No. 34/MM-PBD/MEMO/08/2024 dated 30 August 2024. In the memorandum stated that company provide the break time 1 hour with working hour 7 hour per day. break time is arranged by the field assistant for outsourced employees on a rotating basis. Socialization of Memorandum that confrim break times has been socialized to all outsorce employee on 30 August 2024. Evidence of socialization was sighted during audit. Interview with sample outsource employee confirmed that they have aware regarding the memorandum and break times rule, 1 hour break times with 7 hour working hour per day. PT IIS - Buatan II POM and Estate provide the monitoring of break times for |
| | | outsource employee and programed to socialized the break times and working hour rules according to regulation in each quarter. Monitoring programe was sighted during audit. |

| - PT IIS - Buatan II POM and Estate has conduct an evaluation of the premium determination in the memorandum in accordance with applicable regulations and conduct detailed justification regarding the premium determination in the memorandum. Company issue Memorandum No. /EKS-KSP/MEMO/08/2024 dated 30 August 2024. Memorandum explain the evaluation result of previous premium determination and justification of premium determination. Company has removes the workday premium for PHL (daily) workers when it exceeds 20 workdays and replaces it with a workday wage accordingly. Company also has evaluated the premiums for land application workers IDR 10,000/10m3 or estimated 1 hour. Premiums after working hour also has changed refer to overtime regulation. |
|--|
| - PT IIS - Buatan II POM and Estate has socialized the memorandum of premiums and its justification to all workers on 2 Sept 2024. Interview with sample workers of Land Application and daily workers confirmed that they have aware related to memorandum of premiums and the justification of premium determination. |
| - PT IIS - Buatan II POM and Estate has register all employee to the "Jaminan Pensiun" pension guarantee/insurance according to BPJS regulation. Socialization related to BPJS pensiun has been conducted to PHL workers (daily workers) on 2 Sept 2024. There are 4 PHL workers who didnt follow the pension guarantee/insurance because employees do not want any wage deductions for BPJS pension as regulated in the BPJS pension provisions. Statement letter from workers was sighted and confirmed during interview with workers. |
| Based on above evidence of CAP, conclude that NC has been closed satisfactory on 14/09/2024. |

| Non-conformity | | | |
|--|--|--------------|------------|
| NCR Ref # | 2529297-202407-N1 | Issued Date | 02/08/2024 |
| Due Date | Next ASA | Closure Date | Next ASA |
| Indicator & Category (Critical / Minor) | Minor 2.1.2 | | |
| Statement of Nonconformity: | A documented system for ensuring legal compliance for outsourcing services contractor has not been implemented. | | |
| Requirement Reference: | 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. | | |
| Objective Evidence: | There is a use of 6 outsourced workers as sorting workers at Buatan II POM from the the labor service provider on behalf of PT Permata Indo Sejahtera, However, compliance evaluation documents for compliance with regulations which implemented by PT Permata Indo Sejahtera could not be shown during audit. Furthermore, it was confirmed that outsourced workers used PPE (Safety Shoes) provided by the outsourced workers themselves and were not facilitated by the labor service provider (PT Permata Indo Sejahtera), this is not in accordance with Law No.1/1970. | | |

| Corrections: | Conducted an evaluation of legal compliance with the contractor PT Permata Indo Sejahtera. Evaluated the information regarding the purchase of safety shoes from outsourcing employees and requested PT Permata Indo Sejahtera to comply with the company's policy regulations which must facilitate each employee with complete PPE in accordance with the company's PPE SOP | |
|------------------------|--|--|
| Root Cause Analysis: | Lack of monitoring of legal compliance evaluation from PIC (Public Relations). | |
| Corrective Actions: | - Monitoring for every new contractor in the Buatan II unit, legal compliance evaluation is carried out immediately. | |
| | Conducting periodic monitoring and evaluation of compliance with contractors at least once a year to ensure that contractors comply with applicable company regulations | |
| Assessment Conclusion: | Will be verify in the next surveillance assessment. | |

| Non-conformity | | | |
|--|--|--------------|------------|
| NCR Ref # | 2529297-202407-N2 | Issued Date | 02/08/2024 |
| Due Date | Next ASA | Closure Date | Next ASA |
| Indicator & Category (Critical / Minor) | Minor 2.2.3 | | |
| Statement of Nonconformity: | Cooperation Agreement Contract the labor service provider – Sortasi No. 116/PKS/IISPBS-PIS/VII/2024 dated 3 July 2024 with PT Permata Indo Sejahtera, does not contain a clause disallowing child, forced and trafficked labour. | | |
| Requirement Reference: | All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. | | |
| Objective Evidence: | Based on document review of Cooperation Agreement Contract the labor service provider – Sortasi No. 116/PKS/IISPBS-PIS/VII/2024 dated 3 July 2024 with PT Permata Indo Sejahtera, does not contain a clause disallowing child, forced and trafficked labour. | | |
| Corrections: | Updating the contract and clauses in the Buatan II unit cooperation agreement with PT Permata Indo Sejahtera by including clauses prohibiting child labor, forced labor and human trafficking. | | |
| Root Cause Analysis: | Lack of management communication regarding the addition of clauses that are mandatory in the contractor's SPK | | |
| Corrective Actions: | Coordination with the HRD team so that each agreement document uses a new format with clauses prohibiting child labor, forced labor and human trafficking. | | |
| Assessment Conclusion: | Will be verify in the next surveillance assessment. | | |

| 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

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| Previous Audit Critical (Major) Non-conformity | | | |
|--|---|--------------|-------------------|
| NCR Ref # | 2367923-202307-M1 | Issued Date | 15 July 2023 |
| Due Date | 14 October 2023 | Closure Date | 26 September 2023 |
| Indicator & Category (Critical / Minor) | Critical 3.6.1 | | |
| Statement of Nonconformity: | Risk analysis has been carried out by the company, however there is some activity has not cover by risk analysis. | | |
| 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 visit to Buatan II POM, there were activity of Biogas Plant construction, however there is no risk analysis caried out by Buatan II POM. During field visit to Simpang Perak Estate, there were activity of pest and disease census, however there is no risk analysis caried out by Simpang perak Estate. Based on document verification and field visit it was noted that there were housing repair and maintenance activity, however there is no risk analysis caried out for the activity. PT IIS Buatan II POM and Simpang Perak Estate has shown risk analysis and risk control document updated January 2023, however risk analysis has not cover the activity as above. | | |
| Corrections: | Coordination with the HSE team in updating HIRADC by analyzing the risk of the activities of biogas plant construction by contractors, pest and disease census and housing repair and maintenance activity. | | |
| Root Cause Analysis: | Updates to the risk analysis documents only been carried out at the beginning of every year, so that new activity conducted by contractor the risk analysis documents for each job are not updated. Lack of monitoring by OHS personnel for HIRADC and its implementation. | | |
| Corrective Actions: | Update and evaluated HIRADC at least once a year, considering work accident occurs, new activity by contractors or new activity in the operation whether permanent or seasonal work. | | |
| Assessment Conclusion: | • Buatan II POM coordinate with HSE team and Biogas contractor to evaluate and conduct the risk analysis for Biogas construction activity. | | |

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| | Risk analysis result has been included and updated in HIRADC document, dated 2 August 2023. Risk analysis result also has been communicated to all contractors workers on 22 August 2023. Evidence of HIRADC document updated and socialization of HIRADC to contractor workers can be shown during audit. Interview with contractor workers also confirmed that they have aware regarding the risk and its mitigation related to their work activity. Buatan II POM and estate has coordinated with HSE team to evaluate and conduct the risk analysis for Pest and disease census. HIRADC document for pest and disease census has been establish and updated 29 July 2023. Risk and its mitigation plan also has been establish and communicated to related workers. Buatan II POM and Estate has coordinate with HSE team to evaluate and conduct the risk analysis for housing rep[air and maintenance. HIRADC document for phousing repair and maintenance has been establish and updated 29 July 2023. Risk and updated 29 July 2023. Risk and its mitigation plan also has been establish and communicated to related workers. |
|---|--|
| | This nonconformances can be closed |
| Effectiveness Closure (for previous audit closed Critical NC): During ASA2.3 audit, there is no issue related to this indicator. Organization Based on document review the HIRADC document, the last update is on 09/0 Based on document review the HIRADC document updated 09/01/20 covered all activities at organization. The corrective action has been implemented consistently. | |

| Previous Audit Critical (N | Previous Audit Critical (Major) Non-conformity | | | | |
|--|---|--------------|-------------------|--|--|
| NCR Ref # | 2367923-202307-M2 | Issued Date | 15 July 2023 | | |
| Due Date | 14 October 2023 | Closure Date | 26 September 2023 | | |
| Indicator & Category (Critical / Minor) | Critical 6.2.2 | | | | |
| Statement of Nonconformity: | At the time of the audit, it was found that 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 field observations and interviews with harvest workers in Afdeling 3 Block C91e, the following was found: Harvesters are accompanied by their wives when they are harvesting where the wife quotes loose fruit and is not registered as a worker and does not have a work contract with the company Confession from 3 harvesters stating that they sometimes help with harvesting activities (fruit-loose picker) but these people are not registered as workers and do not have a work contract with the company. | | | | |

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| Corrections: | Create a policy (Memo) from management regarding the prohibition on carrying harvester helper without work contract with company. | | |
|--|--|--|--|
| | Conduct socialization to harvesters regarding the prohibition on carrying own helper. | | |
| | Install billboards prohibiting carrying own helper at every Afdeling office | | |
| Root Cause Analysis: | • Harvesters on their own initiative bring in workers (picking loose fruit) who do not have work agreements with the aim of increasing the output they will get, while company management has determined that every job must carry out a work agreement. | | |
| | Lack of supervision in the field by foremen and field assistants | | |
| Corrective Actions: | • Provide warnings and sanctions to harvesters if they still bring helper/workers who do not have work contracts with company into the field. | | |
| | • Supervision carries out monitoring in the morning and while working in the field to ensure there is no harvester helper without contract working in the field. | | |
| Assessment Conclusion: | Company has issued the Memorandum No. EST/KBN/MEMO/07/2023 dated 27 July 2023 regarding prohibition on bringing children, wives and workers who do not have a work contract with the company. Memorandum or policy has been communicated to all harvester on 4 August 2023 and 15 September 2023 in all Afdeling of Simpang Perak Estate. During interview with sampled harvester confirmed that they have aware that it is prohibit to carrying the own helper in the field without work contract with company. They also have aware about the risk of carrying own helper without work contract and its sanction if violate the company policy on this. Company also has install the signboard/billboard prohibiting carrying own helper at every Afdeling office. Evidence of signboard can be shown during field visit to Afdeling Office of Simpang Perak Estate. Record of signboard installment are available in "Berita Acara Pemasangan Baliho Larangan Gerdang" dated 7 August 2023 in Afdeling 1, 2, 3, 4 and Perumahan/Hosuing Eko 2 and 3. Monitoring has been conducted by field supervisor and field assistant to ensure there is no helper for harvesting in the field who has no contract with company. Evidence of monitoring can be shown as record in Checklist Pemeriksaan Gerdang". Record of monitoring period August 2023 can be shown during audit. | | |
| | This nonconformances can be closed | | |
| Effectiveness Closure (for previous audit closed Critical NC): | During ASA2.3 audit, there is no issue related to this indicator. Auditor has carried out field verification at harvesting activity and interview to the harvester and supervisor, it was known that there is no worker without contract. The signboard/billboard prohibiting carrying own helper at every Afdeling office are already available. | | |
| | The corrective action has been implemented consistently. | | |

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| Previo | Previous Audit Opportunity for Improvement | | |
|--------|--|--|--|
| OFI# | Description | | |
| OFI 1 | OFI Statement: | | |
| | Verification / Follow-up actions: - | | |

3.3.2 Summary of the Nonconformities and Status

| CAR Ref. | Category (Critical / Minor) | P&C Indicator | Issued Date | Status & Date (Closure) |
|-------------------|--------------------------------|------------------|--------------|------------------------------|
| 1937028-202007-M1 | Critical | 3.8.6 | 23 July 2020 | Closed on 17 October 2020 |
| 1937028-202007-M2 | Critical | 3.8.16 | 23 July 2020 | Closed on 17 October 2020 |
| 1937028-202007-M3 | Critical | 6.6.2 | 23 July 2020 | Closed on 17 October 2020 |
| 1937028-202007-M4 | Critical | 7.10.1 | 23 July 2020 | Closed on 17 October 2020 |
| 2032041-202103-N1 | Minor | 6.2.7 | 5 March 2021 | Closed on 15 June 2022 |
| 2032041-202103-N2 | Minor | 7.3.2 | 5 March 2021 | Closed on 15 June 2022 |
| 2213475-202206-N1 | Minor | 3.7.3 | 17 June 2022 | Closed on 15 July 2023 |
| 2213475-202206-N2 | Minor | 6.7.2 | 17 June 2022 | Closed on 15 July 2023 |
| 2367923-202307-M1 | Critical | 3.6.1 | 15 July 2023 | Closed on 26 Sept 2023 |
| 2367923-202307-M2 | Critical | 6.2.2 | 15 July 2023 | Closed on 26 Sept 2023 |
| 2529297-202407-M1 | Critical | 6.2.3 | 2 Aug 2024 | Closed on 14 Sep 2024 |
| 2529297-202407-N1 | Minor | 2.1.2 | 2 Aug 2024 | Next ASA |
| 2529297-202407-N2 | Minor | 2.2.3 | 2 Aug 2024 | Next ASA |

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 Inti Indosawit Subur – Buatan II POM** Certification Unit's environmental and social performance, legal and any known dispute issues.

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

Structured worker interviews with male and female workers and staff were held in private at the workplace. 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 | Environment Office of Pelalawan Regency - Dinas Lingkungan Hidup Kabupaten Pelalawan: Mr Dely Abee (Kasi. Pengawas Lingkungan) | Phone interview | |
| | Environment Office of Riau Province - <i>Dinas Lingkungan</i> <i>Hidup Provinsi Riau</i>: Mr Heri (Kasi. Pengawas Lingkungan) | | |
| | Plantation Office of Pelalawan Regency - Dinas Perkebunan di Kabupaten Pelalawan: Mrs Elizabeth | | |
| | Plantation Office of Riau Province - <i>Dinas</i> <i>Perkebunan Provinsi Riau</i>: Mr Sondang Leni | | |
| | Manpower Office of Pelalalawan Regency and Riau Province - Dinas Ketenagakerjaan Kabupaten Pelalawan/Provinsi Riau: Mr Sondang Leni | | |

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| Communities | Head of Lalang Kabung Village - <i>Penghulu/Kepala Desa Lalang</i> <i>Kabung (Kabupaten Siak)</i> : | face to face interview |
|-----------------|---|------------------------|
| | Mr Nana | |
| Internal, Union | Gender Committe: Ibu Selvia JH (Head of Gender Committe PT IIS - Buatan Group) | face to face interview |
| | Worker Union –PUK SPPP SPSI: Siswanto – Head of PUK SPPP SPSI PBD | |

| Stakeh | olders comment | | | |
|--------|--|--|--|--|
| 1# | Feedbacks: | | | |
| | Plantation Office of Pelalawan Regency - <i>Dinas Perkebunan Kabupaten Pelalawan</i> Plantation Office of Riau Province - <i>Dinas Perkebunan Provinsi Riau</i> | | | |
| | • The company has a Plantation Business Registration Letter (SPUP). A Land Class assessment has been carried out for the 2024 period with garden class II results. | | | |
| | • There are issues related to the replanting process of Plasma plantations where the plantation locations are in 2 districts, namely Pelalawan Regency and Siak Regency. | | | |
| | There are no issues related to plasma management and plant pest attacks | | | |
| | • There are no issues related to land fires in the 2023-2024 period. | | | |
| | Audit Team verification and response: | | | |
| | • Buatan Group: Plantation Business Registration Letter (SPUP) from the Ministry of Forestry and Plantation, No.185/Mentanhut/VII/2000, dated 3 November 2000. | | | |
| | • Regarding the issue for replanting with BPDPKS funds, the application will be made according to the location of the farmer's plot. If the location of the plot is in Siak Regency, BPDPKS replanting will be submitted to Disbun Siak Regency and if the plot location is in Pelalawan Regency, BPDPKS replanting will be submitted to Disbun Pelalwan Regency. The organization will always coordinate with Plantation Office of Riau Province and Pelawan Regency. | | | |
| | • The Group's Plasma Replanting Plan will start in Y2025 – Y2030. | | | |
| 2# | Feedbacks: | | | |
| | Environment Office of Pelalawan Regency - <i>Dinas Lingkungan Hidup Kabupaten Pelalawan</i> Environment Office of Riau Province - <i>Dinas Lingkungan Hidup Provinsi Riau</i> Replanting activities was included in environmental management and monitoring plans (RKL RPL). | | | |
| | The company consistently reports on environmental management: RKL-RPL Report, Hazardous Waste Management Report, Liquid Waste Utilization Report. | | | |
| | • PT Inti Indosawit Subur – Buatan II POM has carried out good environmental management. | | | |
| | Monitoring reports for hazardous waste/LB3 at the Hazardous Waste Storage (TPS LB3) for hazardous waste/LB3 have been carried out. | | | |
| | There are 2 issues: | | | |



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| | There is a case from the community, namely there is an unpleasant smell, thought to come from waste from PT IIS - Buatan Group in April 2023, the community through their representatives, visited the location and found that there was found a smell which was thought to come from Mill. | | | | |
|----|--|--|--|--|--|
| | There are issues related to the Biogas development at Buatan II POM where there have been no changes to the AMDAL documents held. | | | | |
| | Audit Team verification and response: | | | | |
| | • The positive things that have been done will be maintained and improved for the better by the company. | | | | |
| | • In dealing with replanting activities, of course there are many social issues that arise from environmental impacts. In this case, the company has carried out an assessment of social impact aspects and then created a social impact management plan. The social impact management and monitoring plan to avoid or reduce negative impacts and promote positive impacts is presented in the "Social Impact Management Plan and Social Impact Monitoring Plan". | | | | |
| | Related to 2 issues: | | | | |
| | Regarding the issue of pollution from the Buatan Group: | | | | |
| : | . The Company has identified the source of the odor coming from the sewer pipe to the Land Application area which is underground in the Buatan Estate area which experienced a leak (caused by a pipe that crossed the road passed by a tractor carrying FFB and broke and leaked). After reports from the public, the response team from Buatan POM has carried out repairs and immediately replaced the pipes and diverted the pipes so that vehicles or heavy equipment cannot pass through them. | | | | |
| | Regarding the construction of Biogas at Buatan II POM; | | | | |
| | Biogas development at Buatan II POM has started since 2023. PT IIS – Buatan Group's Environmental Permit Document - AMDAL has been in possession since 2019. PT IIS has sent a letter to the Environmental Office of Riau Province for directions on changes to the environmental document (AMDAL) dan is currently in process. Based on this information has explained in the indicator 3.4.1. | | | | |
| 3# | Feedbacks: | | | | |
| | Manpower Office of Pelalawan Regency and Riau Province <i>- Dinas Ketenagakerjaan</i> Kabupaten Pelalawan /Provinsi Riau: | | | | |
| | In general, PT Inti Indosawit – Buatan POM Group has established good communication with the Manpower and Transmigration Office – Pelalawan Regency. | | | | |
| | • PT Inti Indosawit Subur – Buatan POM Group has complied with laws and regulations relating to employment. | | | | |
| | PT IIS has provided all normative rights for employees, such as salaries listed in the provincial minimum wage, leave rights, employees registered with workers' social insurance (BPJS), allowances for religious festivals, provision of facilities (housing, electricity, clean water, medical clinics, school/school buses, places of worship, personal protective equipment, work tools, etc.). | | | | |
| | No industrial relations disputes have occurred since last year. | | | | |
| | • No problems were identified related to the use of child labor, violence and forced labor. | | | | |
| | • The company has prepared infrastructure and facilities for worker welfare such as: housing, clean water, electricity, medical facilities, education, etc. | | | | |
| | Audit Team verification and response: | | | | |
| · | The company is committed to implementing law and regulations relating to employment. | | | | |
| | Feedbacks: Penghulu/Head of Village Lalang Kabung | | | | |
| | | | | | |



| | Communication has been well established. | | | | |
|----|---|--|--|--|--|
| | There are no land conflicts between the community and the company (PT IIS). | | | | |
| | There are no issues related to environmental pollution | | | | |
| | There are no issues regarding land burning in Buatan II Plantation. | | | | |
| | There are no issues related to operational practices that violate human rights. | | | | |
| | CSR programs are always carried out every year. The company always sends its representatives to | | | | |
| | Musrembang negotiations/discussions. | | | | |
| | Audit Team verification and response: | | | | |
| | It is a positive response, requiring no further response. | | | | |
| | • It is recommended that PT Inti Indosawit Subur maintain communication with the community and village officials. | | | | |
| | • The CSR program will be developed in accordance with the community empowerment program and guidance and coaching. | | | | |
| | The last Musrembang was held on 29 February 2024 in Pelalawan District. | | | | |
| 5# | Feedbacks: | | | | |
| | Worker Union –PUK SPPP SPSI: | | | | |
| | • Communication has been well established through meetings with PT IIS. Meetings between the | | | | |
| | company and employees are held whenever problems arise and require discussion. | | | | |
| | The company has provided training to workers to improve knowledge and skills. | | | | |
| | • The Company has a policy of prohibiting the recruitment of employees under 18 years of age, including family workers, in all operations. | | | | |
| | The company does not use migrant workers and prohibits forced labor. | | | | |
| | • Workers' salaries follow the minimum wage set by the Riau Provincial Government for 2023/2024. | | | | |
| | • There is a collective work agreement between the company and employees through a Collective Work Agreement (PKB) for the 2022-2024 period. | | | | |
| | • There was a case of violation of company policy by Sorting Workers at Buatan II POM which resulted in Termination of Employment (PHK). | | | | |
| | Audit Team verification and response: | | | | |
| | • Recognized by the auditor as a positive response, and will be monitored in each subsequent audit. | | | | |
| | • Management will strive to continue and improve positive practices in implementing the company's commitment to health and safety, as well as upholding human rights. | | | | |
| | • The 7 sorting workers have been processed and declared to have been terminated (PHK) and have been given their worker rights, in accordance with the PKB for the 2022-2024 period, this has also been explained in the indicator 6.2.3. | | | | |
| 6# | Feedbacks: | | | | |
| | Gender Committee | | | | |
| | • The company has implemented policies related to the protection of reproductive rights; such as not employing women for high-risk work activities; monthly pregnancy tests for fertilizer sprayers and applicators; 6 monthly inspections for fertilizer sprayers and applicators. | | | | |
| | • All female workers in the spraying team and fertilizer team must take a pregnancy test at the company clinic, once a month. | | | | |
| | • There is no indication that the company commits sexual harassment, there is no indication of gender discrimination, there is no indication of human rights violations, and there is no indication of forced labor. | | | | |



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Audit Team verification and response:

No negative issue need further verification

| 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 Inti Indosawit Subur - Buatan II POM has established since 1985 and has planting palm oil since 1988, 1989, 1990 and 1991. Currently the palm oil has been replanting since 2014 - 2021.

| Previou | 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.

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 Inti Indosawit Subur- Buatan II Palm Oil 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 Inti Indosawit Subur- Buatan II Palm Oil Mill** is remain certified.

| Report prepared by | Acceptance of Assessment Conclusion |
|---|--|
| Name: | Name: |
| Nanang Rusmana | Putu Ghryate Yonata Aksa |
| Company Name: | Company Name: |
| On behalf of BSI Services Malaysia Sdn.Bhd. | PT Inti Indosawit Subur- Buatan II Palm Oil Mill |
| Title: | Title: |
| Lead Auditor | Sustainability Manager |
| Signature: | Signature: |
| | (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.) |
| all from Apr | The Ard |
| Date: 08/08/2024 | Date: 02/09/2024 |



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 en | sure strong and healthy relationships. | |
| Criteria 1.1: The unit of certification provides adequate information to relevant stakel languages and forms to allow for effective participation in decision making. | holders on environmental, social and legal issues relevant to RSPO Criter | ia, in appropriate |
| 1.1.1 (C) Management documents that are specified in the RSPO P&C are made publicly available. - Critical (Major) compliance - | The certificate holder has used list of procedure that can be accessed by relevant stakeholder on "<i>Daftar Dokumen dan Informasi untul Diakses Publik PT Inti Indosawit Subur - Buatan Group</i>". In the document, the list of accessible information covers relevant legal, social and environmental aspects related to sustainability. These documents include land certificates (HGU, IMB), OHS plans, environmental and social impact plans, and assessments (RKL-RPL), HCV documentation pollution prevention and reduction plans, complaints, negotiation procedures, complaint progress, public summary reports on certification assessment, and human rights policy. Where there are 32 types of documents grouped in several aspects which refers to RSPO principles and criteria, among others: Location permit and principal permit (Izin Lokasi, Izin Prinsip) Land titles/user rights (IPKH, Sertifikat HGU, HGB and IMB) Occupational health and safety plans (Laporan Pelaksanaan P2K3) Plans and impact assessments relating to environmental and social impacts (AMDAL, Environmental licensing and Environmenta Management Program) HCV & HCS documentation (Conservation Management Plan, HCV Report, Social Impact Assessment and HCV Identification Report) | k e , s d d , n n n s s |

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| | | Management Program, Hazardous waste Report-Laporan LB3, 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 konfik lahan" and records of and recording of deliberation process and compensation). | |
| | | 8. Negotiation procedures (Recording of deliberation process and compensation) | |
| | | 9. Continuous improvement plans (Continuous Improvement Program) | |
| | | 10. Human Rights Policy including in the Company Policy update on 1 December 2019 including the policy on protection of human rights defenders (HRDs)/Whistle-blowers. | |
| | | The list of documents and information provides in Bahasa Indonesia and the form can be understand with all stakeholders. | |
| | | The document mentioned above can be accessed by stakeholders by making an official application to the management so that it can be published. Requests for information/document can be in the form of verbal or official letters, requests for information / documents will be received by the Public Relations / KTU and recorded in the logbook. | |
| | | Based on interviews with government agency and Village Head of Bukit Agung, they area already know the types of documents accessible to the public. | |
| 1.1.2 | Information is provided in appropriate languages and accessible to relevant stakeholders. - Minor compliance - | Based on the results of document review and interviews with agencies, such as the Pelalawan Regency Plantation Service, the Environment Service, Land Office, and Manpower Office, it is known that the information presented by the certification unit has been presented in an appropriate language and can be accessed by the agency and other stakeholder. | Complied |

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| | | The list of documents that can be access by public has been socialized/disseminated to all levels of PT IIS – Buatan Group employees on 12 February 2024 (list of participants can be shown) and on stakeholders (including local contractors) on 19 February 2024 which was attended by 23 stakeholders. Evidence of socialization can be shown during audit. On 2023 the socialized was conducted on 7 – 9 February 2023 to all workers and on 23-24 February 2023 to 20 stakeholders. | |
|---|--|--|----------|
| - | (C) Records of requests for information and responses are maintained. • Critical (Major) compliance - | The certificate holder maintains records of requests for and responses to information on record "<i>Laporan Permintaan Informasi Lainnya PT Inti Indo Sawit</i>". From the results of the record review for the 2023/2024 period, there were no requests for information or other documents from the certificate holders by stakeholders. This is in line with the results of public consultations with related parties such as the Agency of Pelalawan Regency and All Village, where the parties have never submitted a request for information to the certificate holder. Akan tetapi perusahaan telah mendokumentasikan kewajiban memberikan informasi kepada pemerintahan diantaranya: P2K3 report for the third quarter of 2023 was reported on 9 October 2023 to the Pelalawan District Manpower Office. P2K3 report for the first quarter of 2024 reported on 25 April 2024 to the Pelalawan District Manpower Office. P2K3 report for the second quarter of 2024 reported on 9 July 2024 to the Pelalawan District Manpower Office. P2K3 report for the second quarter of 2024 reported on 9 July 2024 to the Pelalawan District Manpower Office. P2K3 report for the second quarter of 2024 reported on 9 July 2024 to the Pelalawan District Manpower Office. P2K3 report for the second quarter of 2024 reported on 9 July 2024 to the Pelalawan District Manpower Office. P2K3 report for the second quarter of 2024 reported on 9 July 2024 to the Pelalawan District Manpower Office. P2K3 report for the second quarter of 2024 reported on 9 July 2024 to the Pelalawan District Manpower Office. P2K3 report on the use and utilization of HGU in 2023 to the Office of Agrarian and Spatial Planning / National Land Agency (BPN) on 6 February 2024. Plantation business progress report (LPUP) SM 1 2024 to Disbunak | Complied |

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| | | Pelalawan Regency, Siak Regency, Disbun Riau Province on 18 July 2024. | |
|-------|---|---|----------|
| | | Report on prevention and control of land fires SM-I 2024 to DLH Pelalawan Regency, Disbunak Pelalawan Regency, BPBD Pelalawan Regency, Fire and Rescue Service Pelalawan Regency on 10 July 2024. | |
| | | - Mandatory Employment Report via online on 24 August 2023. | |
| | | Scheme Smallholder | |
| | | Request Information and response from Stakeholder is documented into a log book " <i>Kebun Plasma Buatan</i> ", up to June 2024, there was 11 information requests in Plasma/smallholder Division. The request are about founding. | |
| | | Based on the verification of the information logbook document, all requests for information from stakeholders and other related parties have been responded to in accordance with established procedures. | |
| | | During interview with stakeholder confirmed that if there is an information request from stakeholder, company immediately respond to them. No issue regarding the timeline of information request response from PT Inti Indosawit Subur – Buatan Group. | |
| 1.1.4 | (C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official. - Critical (Major) compliance - | Based on the ASA 2.3 audit results, there are no changes related to the consultation and communication procedures, the documents are still the same as the previous audit results. Certificate holder has had a procedure of consultation and communication as per SOP No. AA-GL-5008.1-R1: <i>Penanganan Permintaan Informasi Stakeholder</i> . This procedure is available in Bahasa Indonesia and can be access bya stakeholder. The consultation and communication procedure was socialized to stakeholder on on 12 February 2024 (list of participants can | Complied |

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| be shown) and on stakeholders (including local contractors) on 19 february 2024 which was attended by 23 stakeholders. | |
|--|--|
| The company has appointed personal responsibility in accepting and responding to the request for information from the stakeholders, the personal responsible is the HUMAS (Public Relations). Appointment based on Transfer Letter No. 226/HRD/AA/TL/XI/2014 dated 7 November 2014 and also organisasion rased the Internal Memorandum No. 388/ES-KBN/MEMO/06/2015 dated 1 June 2015 related to Duties and Responsibilities of Buatan Group Public Relations to Mr. Lindu Simatupang (as a Public Relation on PT IIS – Buatan Group). The Internal Memoranadum is also explained about the duties and responsibilities of public relations, including: is responsible for receiving and responding to information from stakeholders. | |
| Records of response of request information documented in the logbook, consist of person handle the request, information given and acknowledgement from the person in-charge and signature. Record of incoming communication available in each estate and mill unit. | |
| The request for information was recorded on Log Book "Surat Masuk dan Keluar". | |
| Scheme Smallholder | |
| The scheme smallholders have a mechanism of consultation and communication in " <i>Mekanisme Komunikasi, Konsultasi dan Keluhan</i> ", dated 3rd January 2011. The procedure has been communicated to all members on April 2023 and also recorded into the " <i>Buku Pintar</i> " for each of farmer while for 2024 period this mechanism was communicated again to all members on April 2023. Meanwhile, each KUD has determined the personality who is in charge/responsible related to communication and communication. | |
| Request Information and response from Stakeholder is documented into a log book " <i>Kebun Plasma Buatan</i> ", up to June 2024, there was 11 | |

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| | | information requests in Plasma/smallholder Division. Based on procedure stated that responds for information request within 14 days. | |
|----------|--|--|----------|
| 1.1.5 | An up-to-date list of contacts and detailed stakeholder information is available along with designated representatives. - Minor compliance - | Buatan II POM, Estate and Scheme Smallholder: PT IIS - Buatan Group Stakeholder has maintained list of stakeholder update on June 2024. The List of stakeholders consists of several types of stakeholders based on regional levels: village, provincial and national districts (81 stakeholders), including NGO, for example: FSP NIBA KSPSI, LPAI (Lembaga Perlindungan Anak dan Ibu) and LCKI (Lembaga Cegah Kejahatan Indonesia). | Complied |
| | | The list of stakeholders presented in detail about the address, name of person and phone number and also position and title, the list is including of regent of Pelalawan, Environment Agency, Social Office & Workers of Pelalawan and Siak Regency, Camat Kerinci Kanan, Head of Village Mekar Jaya and Head of Village Makmur etc. | |
| Criteria | 1.2: The unit of certification commits to ethical conduct in all business operation | ations and transactions. | |
| 1.2.1 | A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts. - Minor compliance - | There are no changes related to the Company's Policy on the Company's Code of Ethics signed by President Director Mr. Kevin Tio on December 1, 2019. Human rights policies, ethical behavior have been socialized/conveyed to all levels of employees of PT IIS Buatan Group on on 12 January 2024 (list of participants can be shown during audit) and on stakeholders (including local contractors) on 19 February 2024 which was attended by 23 stakeholders. | Complied |
| | | Consistently this policy has been applied by PT IIS Buatan Group in all its operations, such as in transaction activities, recruitment of workers and cooperation contracts with external parties/contracts (other 2nd party). | |
| | | In the employee selection process, the company has established policies related to business ethics behavior in the Daily Work Agreement | |

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| | 1 | | |
|-------|--|--|----------|
| | | (<i>Perjanjian Kerja Harian</i> -Daily Work Agreement) which is outlined in the annex to the company's policies and behaviors that must be complied with. PKB is a collective labor agreement for permanent workers that has been revised, namely for the period 2022-2024, also affirmed about business ethics behavior in article 16 related to business ethics behavior in the company. | |
| | | For scheme smallholder there is also a policy of acting ethically contained in policy of code of ethical conduct and integrity in all operation and transaction, dated 14 February 2020, which stated: " <i>Berkomitmen dalam perilaku etis dalam berbisnis dalam seluruh transaksi dan operasi bisnis, pela2rangan seluruh bentuk korupsi, penyuapan dan penipuan dalam penggunaan dana dan sumber daya</i> ". | |
| | | Based on the results of interviews with PK shipping contractor representatives, it is known that the contractor has understood and is ready to implement the ethical behavior policy in the company such as no corruption and legal commitment. | |
| | | Based on that explanation, the unit of certification has a policy for ethical behavior. | |
| 1.2.2 | A system is in place to monitor compliance and the implementation of the | Buatan II POM, Estate and Scheme Smallholder: | Complied |
| | policy and overall ethical business practice. - Minor compliance - | The certificate holder has a system or mechanism to monitor the implementation of company policies including the company code of ethics. GM and Public Relations provide responses to an information/case based on the AA GL-5008.1 R1 Procedure, which for the next mechanism is based on the Settlement Procedure with the local community (Procedure No. AA-GL-5009.R1 regarding settlement with the local community, this mechanism also explain related to the reporter's guarantee and disclosure of cases or information. | |
| | | In every transaction resulting from the work that has been completed, Buatan I Group has a mechanism to monitor business ethics policies, for example: in each work completion, a "Berita Acara Penyelesaian | |

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| | | Pekerjaan" which has been verified by the Field Assistant and known by the Estate Manager must be made both inti and plasma plantations (smallholders). PT IIS - Buatan II Group also conducted an internal audit to ensure that the company's policies were implemented properly, the last internal audit was carried out on 18 – 23 March 2024. |
|----------|--|---|
| - | 2: Operate legally and respect rights Int legal requirements as the basic principles of operation in any jurisdiction. | |
| Criteria | 2.1: There is compliance with all applicable local, national and ratified intern | ational laws and regulations. |
| 2.1.1 | (C) The unit of certification complies to relevant regulations. - Critical (Major) compliance - | The company has implemented compliance with government regulations, here is some evidence: BPJS Kesehatan dan BPJS Ketenagakerjaan registration and payment for all employee according to Minimum wages payment for employee accroding to "Keputusan Gubernur Riau Nomor: Kpts.7618/XI/2023 Tentang Upah Minimum Kabupaten/Kota di Provinsi Riau tahun 2024". SK. HGU (Land Title), approved by "Menteri Negara Agraria/Kepala BPN No.10/HGU/1993, dated 13th May 1993 <i>tentang Pemberian HGU atas nama PT. Inti Indosawit Subur, atas tanah di Kabupaten Kampar seluas 5,781.47 Ha</i>". The Company has shown compliance related OHS aspect such as Minister of Manpower Regulation No. 4 of 1987 concerning the Committee for Occupational Safety Experts and Regulation of the Minister of Manpower and Transmigration of the Republic of Indonesia No. 8 of 2010 concerning Personal Protective Equipment. Management and monitoring of hazardous waste and domestic waste in accordance with applicable regulation (refer to criteria |

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| - La m | itigation, according | nout burning and has the infrastructure in fire to <i>Permentan</i> Number. 26 of 2007 section 15. In of cooperative (scheme smallholder): | |
|-----------|-----------------------|--|--|
| - 0 | KUD Name | | |
| | | Deed of establishment | |
| | KUD Tani Rukun | Akta Notaris "Perubahan Anggaran Dasar KUD Tani Rukun" No. 02 dated 10 Nov 2022 | |
| | KUD Makarti Sawit | Akta Pendirian Koperasi Nomor 24/BH/KWK.4/5.1/III/1996, dated 4 March 1996 | |
| | KUD Mitra Usaha | Akta Perubahan KUD Mitra Usaha No: 06/PAD/BH/DISKOP/518/VIII/2003, dated 04/08/2003 | |
| | KUD Bhirawa Bhak | ti Akta Perubahan KUD Bhirawa Bhakti, Keputusan KemenkumHAM No. 75/BH/PAD/KWK.4/5.1/II/1996, dated 8 Nov 1996 | |
| - | Cooperative regist | ration number | |
| | KUD name | Registration number | |
| | KUD Tani Rukun | 1405021130008, dated 16/10/2022 | |
| | KUD Makarti Sawit | 1405023120009, dated 24 Nov 2022 | |
| | KUD Mitra Usaha | 1405021040001, dated 12/07/2024 | |
| | KUD Bhirawa Bhakti | 1405021010016, dated 17/05/2023 | |
| - | Business Permit re | egistration number | |

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| | | | [| | |
|-------|---|---|---|---|--------------------|
| | | | KUD Name | Registration number | |
| | | | KUD Tani Rukun | NIB: 1611220071334, dated 16 Nov 2022 | |
| | | | KUD Makarti Sawit | NIB: 1807240087705, dated 18 Jul 2024 | |
| | | | KUD Mitra Usaha | NIB: 8120211130578, dated 7 Nov 2018 | |
| | | | KUD Bhirawa Bhakti | NIB: 1505230048703, dated 15 May 2023 | |
| 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. - Minor compliance - | by Hum. Inti Indo has bee available all levels The doo ratified a Accordir Group B such as: - Riau Rege - Kepn Pena - Kepn Nom | as Group Buatan osawit Subur - Gro en implemented of all levels of r s of management cument also cont and implemented ng to "Evaluasi K uatan" it was not Governor's Decre ency/City Minimum nenaker No 88 ta nganan Kekerasa nenaker No 2 tah | legal compliance was carried out on July 2024 on Document "Evaluasi Kepatuhan Hukum PT oup Buatan" with the result that all regulations by the company. The list of regulations is management and can be given at any time to in the form of hardcopy or softcopy. rains the latest regulations that have been by the company. epatuhan Hukum PT Inti Indosawit Subur - ed that update regulation has been evaluated e Number: Kpts.7618/XI/2023 concerning the n Wage in Riau Province in 2024. hun 2023 tentang Pedoman Pencegahan dan n Seksual di Tempat Kerja nun 2023 tentang Peraturan Pelaksanaan PP tentang Kesehatan Lingkungan. | Non- compliance |

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| | | A documented system for ensuring legal compliance for outsourcing services contractor has not been implemented. | |
|-------|--|--|----------|
| | | Objective Evidence: | |
| | | There is a use of 6 outsourced workers as sorting workers at Buatan II POM from the the labor service provider on behalf of PT Permata Indo Sejahtera, However, compliance evaluation documents for compliance with regulations which implemented by PT Permata Indo Sejahtera could not be shown during audit. | |
| | | Furthermore, it was confirmed that outsourced workers used PPE (Safety Shoes) provided by the outsourced workers themselves and were not facilitated by the labor service provider (PT Permata Indo Sejahtera), this is not in accordance with Law No.1/1970. | |
| 2.1.3 | Legal or authorized boundaries are clearly demarcated and visibly maintained and there is no planting beyond these legal or authorized boundaries. - Minor compliance - | According to the national regulation, land title (HGU) holder shall maintain the condition of boundary poles and report the use of land title every semester. Based on field visit in Buatan Estate concluded that the boundary poles area well maintained. | Complied |
| | | The boundary poles recorded in document " <i>Laporan Pemeriksaan dan Perawatan Patok Batas"</i> . The poles monitored twice a year. The last monitoring held on 22 – 23 May 2024. All poles (19 poles) in Buatan Estate reported in good condition. During field visit to HGU poles it was observed that HGU poles in good condition and the position in accordance with HGU maps. Sample seen in Buatan Estate: | |
| | | BPN 01 (0° 30' 01.61" N and 101° 49' 17.85" E) BPN 02 (0° 30' 01.56" N and 101° 50' 01.13" E) BPN 03 (0° 29' 54.16" N and 101° 50' 04.01" E) | |
| | | BPN 03 (0° 29' 54.16' N and 101' 50' 04.01' E) BPN 04 (0° 29' 53.73" N and 101° 50' 14.18" E) BPN 05 (0° 30' 01.87" N and 101° 50' 14.03" E) | |

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| | lakarti Sawit, KUD Mitra Usah tion of dispute among the plo | ry poles monitoring KUD Tani Rukun, ha, KUD Bhirawa Bhakti. There is no ts as well with external parties. | |
|-----------------------------|---|--|---|
| Until t contra The fo | this surveillance 2.3 audit or actors in collaboration with PT ollowing is a list of Contractor | the 2023-2024 period, there are 4 IIS-Buatan II Group. | Complied |
| N O. | Contractor Name | Type of Works | Complied |
| 1 | Supatmi | EFB and FFB Transporter | |
| 2 | CV Andalan Makmur Sejahtera | Replanting | |
| 3 | PT Surya Semilan Mandiri | Replanting | Complied |
| 4 | PT Permata Indo Sejahtera | Outsourcing Services – Sortation | |
| 5 | CV Jasa Sahabat Abadi | CPO, PKO Transporter | |
| 6 | CV Buana Jaya Bersama | CPO, PKO Transporter | Complied |
| 7 | CV Jasa Bersama | PKE and Cell Transporter | |
| | abour, and Fresh I Until t contra The fo 2023- N 0. 1 2 3 4 5 6 | abour, and Fresh Fruit Bunch (FFB) suppliers, co Until this surveillance 2.3 audit or contractors in collaboration with PT The following is a list of Contractor 2023-2024 period: N O. Contractor Name 1 Supatmi 2 Sejahtera 3 PT Surya Semilan Mandiri 4 PT Permata Indo Sejahtera 5 CV Jasa Sahabat Abadi 6 CV Buana Jaya Bersama | abour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements. Until this surveillance 2.3 audit or the 2023-2024 period, there are 4 contractors in collaboration with PT IIS-Buatan II Group. The following is a list of Contractors at PT IIS- Buatan II Group in the 2023-2024 period: No. Contractor Name Type of Works 1 Supatmi 2 Sejahtera 3 PT Surya Semilan Mandiri 4 PT Permata Indo Sejahtera Outsourcing Services – Sortation 5 CV Jasa Sahabat Abadi CPO, PKO Transporter 6 CV Buana Jaya Bersama CPO, PKO Transporter |

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| | | There are only 2 FFB suppliers at Buatan II POM, i.e. Simpang Perak Estate and Plasma Buatan II (a total of 8 cooperatives/KUD) and there are no external FFB suppliers, as follows: KUD Mulus Rahayu (Scheme Smallholder) KUD Bhirawa Bakti (Scheme Smallholder) KUD Tani Rukun (Scheme Smallholder) – sampled in this surveillance audit KUD Kebun Sawit Harapan (Scheme Smallholder) KUD Buatan Jaya (Scheme Smallholder) KUD Mitra Usaha (Scheme Smallholder) – sampled in this surveillance audit KUD Makarti Sawit (Scheme Smallholder) – sampled in this surveillance audit KUD Mitra Usaha (Scheme Smallholder) – sampled in this surveillance audit KUD Makarti Sawit (Scheme Smallholder) – sampled in this surveillance audit KUD Bina Mulia (Scheme Smallholder) – sampled in this surveillance audit | |
|-------|---|---|----------|
| 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. - Minor compliance - | Based on document verification and interviews with Buatan II starr, the list of contractors as of June 2024 is up to date. Several of the above contractors and FFB suppliers have collaborated based on the FFB Cooperation Agreement/Sale and Purchase Contract and also this cooperation agreement is signed by both parties and on a stamp/<i>materai</i>, as follows: FFB Sale and Purchase Contract - <i>Kontrak Jual Beli TBS</i> No. 08/TBS/IIS/2020 dated 20 June 2022 colaboration related to FFB Supplier between PT IIS Buatan II and Asosiasi Petani Sawit Swadaya Berkah Makmur Bersama. FFB Sale and Purchase Contract - <i>Kontrak Jual Beli TBS</i> No. 109/TBS/IIS/2022 dated 30 June 2022 colaboration related to FFB Supplier between PT IIS Buatan II and CV Pardamaran. FFB Sale and Purchase Contract - <i>Kontrak Jual Beli TBS</i> No. 117/TBS/IIS/2021 dated 19 ctober 2021 colaboration related to | Complied |

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| FFB Supplier between PT IIS Buatan II and CV Putra Naiko Raja Sonang. |
|--|
| Transportation Agreement - Perjanjian Pengangkutan No. 06/VI/BJB-IIS/2020 dated 4 June 2020 between PT Buana Jaya Bersama and PT Inti Indosawit Subur related to Transportation of Crude Palm Oil (CPO), Palm Kernel (PK) dan Crude Palm Kernel Oil (CPKO) will be termination based on agement two parties. |
| Transportation Agreement - Perjanjian Pengangkutan No. 05/VI/BJB-IIS/2020 dated 4 June 2020 between CV Jasa Bersama and PT Inti Indosawit Subur related to Transportation of Crude Palm Oil (CPO), Palm Kernel (PK) dan Crude Palm Kernel Oil (CPKO) will be termination based on agement two parties. |
| Transportation Agreement - Perjanjian Pengangkutan No. 03/VI/BJB-IIS/2020 dated 4 June 2020 between CV Jasa Sahabat Abadi and PT Inti Indosawit Subur related to Transportation of Crude Palm Oil (CPO), Palm Kernel (PK) dan Crude Palm Kernel Oil (CPKO) will be termination based on agement two parties. |
| PT Permata Indo Sejahtera (Outsourcing Services Provider – Sorting based on Cooperation Agreement No. 116/PKS/IISPBS- PIS/VII/2024 dated July 3, 2024. |
| In the cooperation agreement document, there are articles related to legality requirements, namely: FFB supplied to buyers comes from land owned/controlled/cultivated in accordance with laws and regulations, especially in the field of land and is not limited to protected forest areas, forest areas and conservation areas. |
| In addition, the cooperation document also contains articles related to: |
| - Have land legality documents |
| Prohibitions related to the use of child labor (under 18 years old), forced labor and human trafficking |

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| | | Prohibition of retaliation against Human Rights Defenders (HRD) and prohibition of harassment and intimidation. Suppliers are willing and supportive in the implementation of company policies that are in line with regulations and sustainable certification standards. Based on the verification of the document, that the completeness of the contract regarding the legality requirements can be shown at the time of the audit. | |
|-------|--|---|--------------------|
| 2.2.3 | All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. - Minor compliance - | Several of the above contractors and FFB suppliers have collaborated based on the FFB Cooperation Agreement/Sale and Purchase Contract and also this cooperation agreement is signed by both parties and on a stamp/<i>materai</i>, as follows: FFB Sale and Purchase Contract - <i>Kontrak Jual Beli TBS</i> No. 08/TBS/IIS/2020 dated 20 June 2022 colaboration related to FFB Supplier between PT IIS Buatan II and Asosiasi Petani Sawit Swadaya Berkah Makmur Bersama. FFB Sale and Purchase Contract - <i>Kontrak Jual Beli TBS</i> No. 109/TBS/IIS/2022 dated 30 June 2022 colaboration related to FFB Supplier between PT IIS Buatan II and CV Pardamaran. FFB Sale and Purchase Contract - <i>Kontrak Jual Beli TBS</i> No. 117/TBS/IIS/2021 dated 19 ctober 2021 colaboration related to FFB Supplier between PT IIS Buatan II and CV Putra Naiko Raja Sonang. Transportation Agreement - Perjanjian Pengangkutan No. 06/VI/BJB-IIS/2020 dated 4 June 2020 between PT Buana Jaya Bersama and PT Inti Indosawit Subur related to Transportation of Crude Palm Oil (CPO), Palm Kernel (PK) dan Crude Palm Kernel Oil (CPKO) will be termination based on agement two parties. | Non- compliance |

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| Transportation Agreement - Perjanjian Pengangkutan No. 05/VI/BJB-IIS/2020 dated 4 June 2020 between CV Jasa Bersama and PT Inti Indosawit Subur related to Transportation of Crude Palm Oil (CPO), Palm Kernel (PK) dan Crude Palm Kernel Oil (CPKO) will be termination based on agement two parties. |
|---|
| Transportation Agreement - Perjanjian Pengangkutan No. 03/VI/BJB-IIS/2020 dated 4 June 2020 between CV Jasa Sahabat Abadi and PT Inti Indosawit Subur related to Transportation of Crude Palm Oil (CPO), Palm Kernel (PK) dan Crude Palm Kernel Oil (CPKO) will be termination based on agement two parties. |
| PT Permata Indo Sejahtera (Outsourcing Services Provider – Sorting based on Cooperation Agreement No. 116/PKS/IISPBS- PIS/VII/2024 dated July 3, 2024. However, the employment agreement document does not specifically explain the articles related to legal requirements and the prohibition of child labor and forced labor. |
| Surat Perintah Kerja – Work Order (SPK) No. 971/P2KSP/12/23 dated 20 December 2023 on behalf of CV Andalan Makmur Sejahtera for Replanting type of work. |
| Surat Perintah Kerja – Work Order (SPK) No. 972/P2KSP/12/23 dated 20 December 2023 on behalf of CV Surya Sembilan Mandiri for Replanting type of work. |
| Regarding compliance with the legality and prohibition of child labor and forced labor, this has been explained in the SPK document. |
| In the cooperation agreement document, there are articles related to legality requirements, namely: FFB supplied to buyers comes from land owned/controlled/cultivated in accordance with laws and regulations, especially in the field of land and is not limited to protected forest areas, forest areas and conservation areas. |
| 1. II. I.I.W |

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| | In addition, the cooperation document also contains articles related to: |
|--|---|
| | - Have land legality documents |
| | Prohibitions related to the use of child labor (under 18 years old), forced labor and human trafficking |
| | Prohibition of retaliation against Human Rights Defenders (HRD) and prohibition of harassment and intimidation. |
| | Suppliers are willing and supportive in the implementation of company policies that are in line with regulations and sustainable certification standards. |
| | Based on the verification of the document, that the completeness of the contract regarding the child labour and forced labour can be shown at the time of the audit. However there is 1 contract on behalf of PT Permata Indo Sejahtera (out sourcing services – for FFB sortation in Buatan II POM) there is no spesific caluse on that document. This is raised as noncompliance . |
| | Non Conformance: |
| | Cooperation Agreement for Outsourcing Services – Sortation, there is no specific article explaining the prohibition of child labor (underage) and forced labor. |
| | Objective evidence: |
| | PT Permata Indo Sejahtera (Outsourcing Services – Sortation based on Cooperation Agreement No. 116/PKS/IISPBS-PIS/VII/2024 dated July 3, 2024. There is no specific article related to the prohibition of child labor (underage) and forced labor. |
| Criteria 2.3: All FFB supplies from outside the unit of certification are from legal sou | irces. |

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| 2.3.1 | (C) For all directly sourced FFB, Palm Oil Mill (POM) requires: Information regarding the geolocation of FFB origins; Proof of ownership status, right/claim of the land by grower/smallholder; If relevant, valid planting/operational/trading license, or is part of a cooperative which allows the buying and selling of FFB. Critical (Major) compliance - | During ASA2.3, information obtained that Buatan II POM has chosen the Mass Balance Module and on the process, to implement EUDR requirements, therefore the supply bases as directly sourced of certified FFB from own estate (Simpang Perak Estate) and from scheme smallholder (certified under Buatan II POM: KUD Mulus Rahayu, KUD Bhirawa Bhakti, KUD Tani Rukun, KUD Kebun Sawit Harapan, KUD Buatan Jaya, KUD Mitra Usaha, KUD Makarti Sawit, KUD Bina Mulia) and outside supplier Kebun Tanah Kas Desa-3. The scheme smallholders are KUD Mulus Rahayu, KUD Bhirawa Bakti, KUD Tani Rukun, KUD Kebun Sawit Harapan, KUD Buatan Jaya, KUD Mitra Usaha, KUD Makarti Sawit and KUD Bina Mulia. The information related geolocation, proof of ownership status, and trading license a cooperative has shown during audit. |
|------------|--|---|
| 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 ASA2.3 for period January – December 2023 and January – June 2024 it was known that there is no indirect supplier of FFB for Buatan II POM. |
| Principle | 23: Optimise productivity, efficiency, positive impact and resilience | |
| _ | nt plans, procedures and systems for continuous improvement. | |
| Criteria 3 | 3.1: There is an implemented management plan for the unit of certification | hat 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 - | The Certificate Holder has five years' management plan covering Own Estate, Mill and Smallholder's scheme updated January 2024, as follow:Complied1. Projection – FFB (MT)20242025202620272028Unit20242025202620272028TonTonTonTonTon |

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52,431 55,052 57,805 FFB Production 60,695 63,730 Simpang _ Perak Estate FFB Production 70,821 74,362 78,081 81,985 86,084 Buatan state 115,452 121,225 127,286 133,651 140,333 FFB Production Plasma Buatan II (KUD Mulus Rahayu, KUD Bhirawa Bakti, KUD Tani Rukun, KUD Kebun Sawit Harapan, KUD Buatan Jaya, KUD Mitra Usaha, KUD Makarti Sawit, KUD Bina Mulia) FFB Production ------ Third Parties 2. Production – CPO/PK (MT) Description 2024 2025 2026 2027 2028 FFB processed 238,705 250,640 263,172 276,331 290,147 49,889 52,634 56,582 60,240 63,542 CPO PK 10,980 11,529 12,106 12,711 13,347 3. OER and KER

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| | | Description | 2024 | 2025 | 2026 | 2027 | 2028 | |
|-------|--|--|----------------|------------|-----------------------|---|---------|----------|
| | | OER (%) | 20.90 | 21.00 | 21.50 | 21.80 | 21.90 | |
| | | KER (%) | 4.60 | 4.60 | 4.60 | 4.60 | 4.60 | |
| | | | | | | | | |
| | | 4. Produ | iction cost | | | | | |
| | | Description | 2024 | 2025 | 2026 | 2027 | 2028 | |
| | | IDR/Ton FFB | 260,249 | 280,268 | 300,288 | 320,308 | 340,327 | |
| | | | | | | | | |
| 3.1.2 | An annual replanting programme projected for a minimum of five years with yearly review, is available. - Minor compliance - | PT Inti Indo demonstrate a program as fo | annual replan | | | | | Complied |
| | | Year | Program (H | a) Actua | al (ha) | Block | | |
| | | 2024 | 467 | | oping) B9 C9 C9 | ock C90g, 91c, B91d, 91a, C91b, 91c, C91d, 91h. | | |
| | | 2025 | 261 | | - C | 91e, C91f, C91g | | |
| | | As information at Simpang Pe >25 is only 7 | erak Estate. F | or Simpang | 9 Perak Est | ate, age of p | | |
| | | Scheme Sm | allholder: | | | | | |

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| | | | Kebun Plas | ma Buatan | ble under "Rencana Pelaksanaan ". Below is replanting program of | |
|-------|---|--|--|--|--|----------|
| | | Year | Program | Actual | | |
| | | 2019 | - | - | | |
| | | 2020 | 1,252 | 432 | | |
| | | 2021 | 1,268 | - | | |
| | | 2022 | 1,488 | - | | |
| | | 2023 | 1,476 | - | | |
| | | 2024 | 1,448 | - | | |
| | | 2025 | 1,146 | - | | |
| | | 2026 | 1,366 | - | | |
| | | 2027 | 1,032 | - | | |
| | | Total | 10,476 | 432 | | |
| 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 - | managemen dated 1 Aug II POM was managemen company fo including scl Result of RS The compan | It review sti ust 2020". ⁻ conducted i it review ha or issue re heme small PO Internal ny has annu | pulated in The latest n n March 20 is discussed lated best nolder and l Audit for E al internal a | anagement review annually. The the procedure "AA-SOP-ES-6001-R5 nanagement review at PT IIS Buatan 124 and attended by 11 persons. The d related to the achievement of the management practises of estate best practices both in Mil and Estate, state and Mill audit activity namely Visit Agronomy | Complied |
| | | (VA) and Vis | sit Engineeri | ng (VE). | , | |
| | | Simpang P | erak Estat | e: | | |

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| Report No. VA-KSP-MAY-FULL-23 dated 02 May 2023. There were some issues in this estate, for example: less focus on palm circles, size of circles less than 1.5 meters and control of <i>Centotheca</i> was poor, while in the lowlands, there was no maintenance on circle under leaning palms and for manuring activity found sporadic Boron deficiency sighted in Block A20c Afd I. The Estate has made a corrective action plan and the issues has been closed in June 2023. Until this audit ASA2.3, organization has implemented the corrective action to prevent the issues does not appear again. |
|--|
| Buatan II POM: |
| Report No. VE-PBD-FEB-FULL-1902204-Full Report, date of visit in 19- 24 February 2024. there are some issues in the mill, for examples: |
| - At sterilizer station, The flow of the sterilizer drain ditch is not smooth, so there is standing water. |
| - There is a leak from the mechine at Clarification Station. |
| - At power station, The strong burst of fiber from the fan air lock results in quite a lot of fiber being exposed and polluting the boiler environment. |
| The unit has made a corrective action plan, and the issues has been closed in June 2024. |
| Scheme smallholders: |
| Report visits scheme smallholder " <i>Kunjungan Head Smallholder ke Kebun Plasma Buatan</i> " conducted by Coordinator of Smallholder in Plasma Buatan Group, sample seen visit on 10 July 2024 based on the report there is an issue related to the quality of prunning activity. The unit has made a corrective action plan to close the issue. |

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| | 3.2: The unit of certification regularly monitors and reviews their economic nonstrable continuous improvement in key operations. | , social and environmental performa | nce and develops and implements ac | tion plans that |
|-------|--|--|------------------------------------|-----------------|
| 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 - | Modified Sacks at Collection Point. Current situation High losses of loose waste at C point Percentage of waste from grad Difficulty level for loaders in tra Result Modification of the net on the reduce loose fruit Losses from 4 The net on the collection point loose fruit without a rake. With the collection point net, sa | collection poin has been proven to | Complied |
| | | Buatan II POM: Objective | Strategic Focus | |
| | | Yield CPO MT/Ha (OER) | Reduce oil losses on Press Fibre | |
| | | | Reduce oil losses on Heavy Phase | |
| 1 | | | Reduce oil losses on EFB | |

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| | Improve FFB quality from 3 rd party |
|---|--|
| Labour Dependency | Management of Overtime process |
| | Management of overtime in workshop |
| Kernel Shell Usage | Improve boiler equipment & Operations strategy |
| Technical Oil | Increase OER Segregation |
| Inventory Stock | Reduce inventory stock Mill |
| Consumption of burnt shells 20 tons/day (56.4%) Power Consumption : 24.12 Kwh/Ton TBS Factory Capacity 53.72 Tons/Hour Continuous Improvement Plan : | |
| Reduction of Burnt Shells in Bo Production | iler from 56.4% to 30% of Shel |
| Action Plan Improve Boiler Performance (N 100% Full Bunch Press Operation | - |

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| | | Power Management | | |
|--|--|--|----------|--|
| | | Social impact continuous plan has been identified as social impact assessment. Social management and monitoring plan has been determined and implemented. | | |
| | | Scheme Smallholder: | | |
| | | Continuos Improvement Plan | | |
| | | Acceleration of plasma replanting program | | |
| | | Action Plan | | |
| | | Socialization of replanting in farmers' groups and KUD, direct socialization to farmers, comparative study to gen 2 estate (already succesfull in replanting). | | |
| 3.2.2 | As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat by Certification Body during Annual Surveillance Assessment by using the RSPO metrics template. | RSPO Annual Communication of Progress 2023 of PT Inti Indosawit Subur has been available in RSPO website under membership number 1-0022-06-000-00. At the time of the ASA2_3 audit, the RSPO Metrics | Complied | |
| | - Minor compliance - | template was submitted. | | |
| Criteria 3.3: Operating procedures are appropriately documented, consistently implemented and monitored. | | | | |
| 3.3.1 | (C) Standard Operating Procedures (SOPs) for the unit of certification are in place. - Critical (Major) compliance - | Estate: Based on document review during ASA2.3, it was known that Estate has had Standard Operational Procedures (SOP) that covering entire operational activity as follows: | Complied | |
| | | • SOP AA-APM-OP-1100.01-R4 dated 5 September 2016: <i>Pembibitan</i> (Nursery). | | |
| | | • SOP AA-APM-OP-1100.02-R3 dated 10 June 2015: <i>Penanaman Areal Baru</i> (New Planting). | | |

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| • | SOP AA-APM-OP-1100.03-R2 dated 24 July 2015: <i>Pembuatan dan</i> <i>Perawatan Jalan dan Jembatan</i> (Road and Bridge construction and maintenance); |
|---------|---|
| • | SOP AA-APM-OP-1100.04-R3 dated 7 Decmeber 2015: <i>Pembuatan dan Pemeliharaan Parit</i> (Drainage Construction and Maintenance). |
| • | SOP AA-APM-OP-1100.05-R3 dated 23 November 2016: <i>Konservasi</i> <i>Tanah dan Air</i> (Soil & Water Conservation). |
| • | SOP AA-APM-OP-1100.06-R6 dated 16 February 2017: <i>Menanam kacangan</i> (Planting cover crops). |
| • | SOP AA-APM-OP-1100.07-R6 dated 16 February 2017: <i>Menanam Kelapa Sawit</i> (Planting Oil Palms). |
| • | SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i> (Weed control). |
| • | SOP AA-APM-OP-1100.09. R5 dated 26 December 2018: <i>Pemupukan</i> (Fertilizer application). |
| • | SOP AA-APM-OP-1100.10. R6 dated 23 November 2016: <i>Pengendalian Hama dan Penyakit</i> (Pests & Disease Control). |
| • | SOP AA-APM-OP-1100.11. R1 dated 1 February 2009: <i>Pestisida dan Pengendaliannya</i> (Pesticide Handling). |
| • | SOP AA-APM-OP-1100.12. R3 dated 23 November 2016: <i>Kastrasi</i> (Palm castration) explain cutting all generative product (mal flower, female flower, all fruit, to support vegetative growth) – done 5-6 months before being harvested. |
| • | SOP AA-APM-OP-1100.13. R3 dated 4 March 2016: <i>Tunas Pokok</i> (Pruning). |
| • | SOP AA-APM-OP-1100.14. R3 dated 16 February 2017: <i>Sensus dan Identifikasi Pokok</i> (Census and Palm Identification). |
| • | SOP AA-APM-OP-1100.15. R2 dated 1 October 2010: Sensus Produksi |
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| |
|---|
| (Production Census). |
| SOP AA-APM-OP-1100.16. R1 dated 1 February 2009: Konsolidasi |
| Pohon Tumbang (Provision of Support to Fallen Palm). |
| SOP AA-APM-OP-1100.17. R1 dated 23 October 2014: <i>Pengelolaan</i> Air (Water Management). |
| SOP AA-APM-OP-1100.18.R3 dated 20 April 2015: <i>Potong Buah</i> (Harvesting). |
| SOP AA-APM-OP-1100.19.R1 dated 1 February 2009: Pengelolaan Transport (FFB Transport). |
| SOP AA-APM-OP-1100.20-R6 dated 1 May 2019: Peremajaan (Replanting). |
| There is no change about the SOP until this audit. |
| Buatan II POM has documented and implemented procedure related to process of FFB to become CPO and PK, starts from FFB receiving to dispatch of CPO and PK: |
| SOP AA-MPM-OP-1400.02.R2 dated 1 September 2011: Stasiun Penerimaan for FFB Receiving Station; |
| SOP AA-MPM-OP-1400.03.R1 dated 1 February 2009: Stasiun Rebusan for Sterilizer; |
| 3. SOP AA-MPM-OP-1400.04.R1 dated 1 February 2009: <i>Stasiun Pemisahan Berondolan</i> for Loose Fruit Separation; |
| 4. SOP AA-MPM-OP-1400.05-R1 dated 1 February 2009: <i>Stasiun</i> <i>Pengadukan</i> dan Pengempaan for Pressing Station; |
| 5. SOP AA-MPM-OP-1400.06-R1 dated 1 February 2009: <i>Stasiun Pemurnian</i> for Clarification; |
| 6. SOP AA-MPM-OP-1400.07-R1 dated 1 February 2009: Stasiun |

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| Pemisahan Nut dan Fiber for Nut and Fiber Separation; |
|--|
| SOP AA-MPM-OP-1400.08-R1 dated 1 February 2009: <i>Stasiun Kernel</i> for Kernel Station; |
| 8. SOP AA-MPM-OP-1400.09-R1 dated 1 February 2009: <i>Stasiun</i> Boiler; |
| SOP AA-MPM-OP-1400.10-R1 dated 1 February 2009: Stasiun Engine Room; |
| 10. SOP AA-MPM-OP-1400.11-R1 dated 1 February 2009: <i>Stasiun</i> Water Treatment; |
| 11. SOP AA-MPM-OP-1400.12-R1 dated 1 February 2009: Laboratorium; |
| 12. SOP AA-MPM-OP-1400.13-R1 dated 1 February 2009: <i>Stasiun Pengelolaan Limbah</i> for Palm Oil Mill Effluent Treatment; |
| 13. SOP AA-MPM-OP-1400.14-R2 dated 1 September 2011: <i>Stasiun</i> <i>Penimbunan dan Pengiriman CPO dan Kernel</i> for CPO and PK Bulking and Despatch Operation; |
| 14. SOP AA-MPM-OP-1400.15-R1 dated 1 February 2009: <i>Perawatan</i> for Preventive Maintenance; |
| 15. SOP AA-MPM-OP-1400.19.R2 dated 1 September 2011: <i>Manajemen dan Metode Menghitung Emisi Gas Rumah Kaca</i> (GHG) |
| 16. SOP AA-MPM-OP-1400.18-R4 Book Keeping |
| 17. AA-MPM-OP-1400.17-R6 Traceability |
| There is no change about the SOP until this audit. Those documents above are available in each unit. |
| Scheme Smallholder: |
| Scheme smallholder has had best management practices procedure as follows: |

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| AA-PLASMA-PP-KS-01 <i>Pembibitan</i> (Nursery) |
|--|
| AA-APM-OP-1100.09-R3 <i>Pemupukan</i> (Manuring) dated 20 April 2015 |
| AA-PLASMA-PP-KS-04 <i>Potong Buah</i> (Harvesting) |
| AA-PLASMA-PP-KS-05 <i>Pengangkutan TBS</i> (FFB Transport) |
| AA-APM-OP-1100.10-R5 <i>Pengendalian Hama dan Penyakit</i> (Pest and Disease Control) dated 11 January 2016 |
| AA-APM-OP-1100.20-R5 <i>Peremajaan</i> (Replanting) dated 4 March 2016 |
| AA-MM-508-1-RO <i>Penerimaan TBS Plasma</i> (FFB Plasma Receiving) 1 September 2015 |
| AA-MM-508-2-RO <i>Penentuan Taksasi TBS Plasma</i> (FFB Plasma Estimation) |
| AA-APM-OP-1100.8-R5 <i>Pengendalian Gulma</i> (Weed Control) |
| AA-FA-220-2-RO Stempel (Stamp) |
| AA-MPM-OP-1400-17-R6 <i>Ketertelusuran</i> (Traceability) dated 1 September 2017 |
| • AA-APM-OP-1100.02-R3 <i>Penanaman Area Baru</i> (New Planting) |
| AA-SOP-ES-6001-R4 <i>Audit Internal Sustainability</i> (Internal Audit Sustainability) |
| AA-KL-12-EFP <i>Restorasi Riparian dan Areal di Sekitar Danau/Waduk dan Mata Air Lainnya</i> (Restoration of Riparian Area or Near Area of Lake/Damp or Water Sources) dated 1 August 2010 |
| • AA-HR-305.2-RO <i>Rekrutmen dan Seleksi Karyawan</i> (Recruitment and Selection of Employee). |
| There is no change about the SOP until this audit. |

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| | T | Ι | |
|-------|---|---|----------|
| | | During ASA2.3, auditor has conducted field visit to the Simpang Perak Estate as follows: | |
| | | • Harvesting in Simpang Perak Estate at Block D16c Afdeling II. The implementation was good, the harvester can demonstrate the best management practices for harvesting and also safety working procedure. | |
| | | • Barn owl box Block D16c Afdeling II. The management unit using natural predator to control rat infestation. According to the interview, there are 4 barn owl boxes to covering 630 Ha of Afdeling III. | |
| | | • Chemical weeding at Block C91e Afdeling II, the pesticides applicator was carried out interview, based on the interview to the pesticides applicator it was known that they have understood the spraying procedure well. | |
| | | • Fertilizer application Block D17d Afdeling II. According to fertilizer recommendation, Simpang Perak Estate conducted fertilizer application using ZA with dosage 2.59 kg/palm. The fertilizer applicator can demonstrate the application and safety working procedure. | |
| | | • EFB application Block D17d Afdeling II. Unit management using EFB in immature palm to enrich the soil fertility, maintain soil moisture and reducing weeding especially in circle. EFB placing in each palm circle with dosage 27 ton/Ha or equal to 200 – 250 kg/palm. | |
| 3.3.2 | A mechanism to check consistent implementation of procedures is in place. - Minor compliance - | During ASA2.3 it was known that the organization has had a mechanism to check consistent implementation of procedures through annual internal audit activity namely Visit Agronomy (VA) and Visit Engineering (VE). Simpang Perak Estate: | Complied |

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| Report No. VA-KSP-MAY-FULL-23 dated 02 May 2023. There were some issues in this estate, for example: less focus on palm circles, size of circles less than 1.5 meters and control of <i>Centotheca</i> was poor, while in the lowlands, there was no maintenance on circle under leaning palms and for manuring activity found sporadic Boron deficiency sighted in Block A20c Afd I. The Estate has made a corrective action plan and the issues has been closed in June 2023. Until this audit ASA2.3, organization has implemented the corrective action to prevent the issues doesnot appear again. |
|---|
| Buatan II POM: |
| Report No. VE-PBD-FEB-FULL-1902204-Full Report, date of visit in 19-24 February 2024. there are some issues in the mill, for examples: |
| At sterilizer station, The flow of the sterilizer drain ditch is not smooth, so there is standing water. |
| - There is a leak from the mechine at Clarification Station. |
| At power station, The strong burst of fiber from the fan air lock results in quite a lot of fiber being exposed and polluting the boiler environment. |
| The unit has made a corrective action plan, and the issues has been closed in June 2024. |
| Scheme smallholders: |
| Report visits scheme smallholder " <i>Kunjungan Head Smallholder ke Kebun Plasma Buatan</i> " conducted by Coordinator of Smallholder in Plasma Buatan Group, sample seen visit on 10 July 2024 based on the report there is an issue related to the quality of prunning activity. The unit has made a corrective action plan to close the issue. |
| |

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|---------------------------------------|---|---|---------------|
| 3.3.3 | Records of monitoring and any actions taken are maintained and available. - Minor compliance - | Certificate holder conducted monitoring of operational activity in all levels of workers. Each field supervisor has equipped with monitoring sheets/worksheets. For example, harvesting supervisor collected harvesting record and quality of each harvester. The report submitted to estate manager daily. During audit, the records has been verified for period January – May 2024. | Complied |
| | | Therefore, daily operational activity also recorded in daily worksheet by mill supervisor before reported to the mill manager. | |
| | | To ensuring the result of operational activity in line with the procedures, mill/estate manager conducted regularly monitoring of and management review to solve the findings issues. All results of management review are implemented by respective staff. The latest management review at Buatan II POM was conducted on 28 March 2024 and attended by 11 persons. | |
| | 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA ent and monitoring plan is implemented and regularly updated in ongoing o | | environmental |
| 3.4.1 | (C) SEIA in new planting or operation including mills, is conducted independently and participatively by involving the affected stakeholders, inclusive of impact assessment from the smallholder/outgrower scheme (if any). The assessment is to be documented. | There is no change in term of the statement of conformity when comparing from the previous audit result. Up to now since previous assessment last year till the date of this audit, no new planting in PT Inti Indosawit Subur – Buatan Group plantation area. | Complied |
| | - Critical (Major) compliance - | The company have a SEIA documents such as : | |
| | | PT. Inti Indosawit Subur – Buatan Group has demonstrated a document of <i>Kerangka Acuan Studi Analisis Dampak Lingkungan</i> (ANDAL) Perkebunan Kelapa Sawit Pola PIR-Transmigrasi dan Pabrik Minyak kelapa Sawit (PMKS) di Kabupaten Kampar, Indragiri Hulu dan Bengkalis, Propinsi Riau, Agustus 2023 with mill capacity 30 tonnes FFB/hours. This document has approval based on Letter No 694/AMDAL/XI/93 dated 5 November 1993. | |

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| | PT. Inti Indosawit Subur – Buatan Group has demonstrated a document Environmental Management and Monitoring Document "Dokumen Pengelolaan dan Pemantauan Lingkungan" year 2009. The document was approved by Governor of Riau through "Surat Keputusan Gubernur Riau No.Kpts.975/X/2009 tentang Penetapan Dokumen Pengelolaan dan Pemantauan Lingkungan Penambahan Kapasitas Produksi Pabrik Minyak Kelapa Sawit PT. Inti Indosawit Subur dan Kegiatan Pendukungnya, Sentral Workshop Buatan dan Pembuatan Laboratorium Kultur Jaringan Berlokasi di Kecamatan Pangkalan Kerinci dan Kecamatan Pelalawan, Kabupaten Pelalawan; Kecamatan Kerinci Kanan dan Kecamatan Dayun, Kabupaten Siak, Provinsi Riau" – dated 28th September 2009. Mill capacity 60 tonnes FFB/hour. KUD (cooperative) holds a set of copy of latest AMDAL documents in the Cooperative office. EIA of scheme smallholder has been covered by the "Dokumen Pengelolaan dan Pemantauan Lingkungan", for mill with capacity 60 tonnes FFB/hour, Own Estate 5,781 hectares, and Plasma 12,000 hectares. The EIA (DPPL) has met the applicable requirement and has been approved on 2009 through Governor Decree number Kpts.975/X/2009 dated 28th October 2009. | |
|--|---|--|
| | The environmental impact assessment carried out by PT. Holistika Primagrahita with team consist of: • Team leader: Ir.Nur Iskandar (Fisheries/AMDAL B) | |
| | Physic/Chemical team: Azni Hamzah, S.Si (Chemical/AMDAL B) | |
| | | |
| | Biology team: Khairunnazmi, S.Pi (Aquatic biology/AMDAL B), Marualat Harahap (Agriculture/AMDAL B) | |
| | Activity: Marualat Harahap (Agriculture/AMDAL B) | |
| | | |

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| Social team: Yandra Mufialdo, S.Sos (Social economy) | |
|--|--|
| Mapping: M. Irsyadul Anwar, S.Pi | |
| | |
| All significant impacts have been identified e.g: reduction of soil and water quality, reduction of air quality, impact to socioeconomic of local community, etc. Plan to monitor and manage of each identified environment impact have been provided and documented. The EIA document contained evidence of involvement of surrounding community during study and public consultation with relevant stakeholder. The impact assessment for replanting has identified impacts such as: | |
| changes in micro-climate, a decrease in air quality, increase in noise level, quantity and quality of surface water, soil erosion and sedimentation, loss of flora and fauna, disturbance to aquatic biota, community health and surrounding environment health. | |
| The document has also completed with environmental management and monitoring plan. The plans were explaining type of impact, source of impact, impact parameter, management purpose, management and monitoring plan, management/monitoring location, management/monitoring timeframe. | |
| Biogas development at Buatan II POM has started since 2023. Environmental Permit Document - Amdal PT IIS - Buatan Group has been owned since 2009. PT IIS has sent a letter to the Riau Province Environmental and Environmental Service for direction on changing the environmental document (Amdal) and is currently in process, details : | |
| • Letter No : 57/EXT/GI-RO2/I/24 dated 26 January 2024 about "Permohonan Arahan Perizinan Operasional Biogas Plant" to Dinas Energi dan Sumberdaya Mineral Provinsi Riau | |

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| Letter No : 670/DESDM.02/0066 dated 5 February 2024 from Dinas Energi dan Sumberdaya Mineral Provinsi Riau about "Arahan Perizinan Operasional Biogas Plant". | |
|--|--|
| In this letter stated that Biogas Plant have license criteria KBLI 35203 where for licensing process through Kementrian ESDM for and can be access online via Go Live OSS BKPM. The mechanism for KBLI 35203 licensing are Request via OSS (upload the required documents) \rightarrow Document Verification \rightarrow Field verification \rightarrow License Approval \rightarrow Issuance of license | |
| Based on an interview with Mr. Cxxx (Environment Agency Riau Province, ANDAL Section), that biogas in Buatan II POM has been operating since 2023 and this biogas development is an improvement related to environmental management and is not a main/main activity and is not commercial (the electricity produced is for personal use). So based on PP No. 22/2021, the company does not need an ANDAL addendum and only needs to make changes to the environmental management matrix which will later be monitored and reported every 6 months. | |
| As per communication records, the company waiting for Environment Agency team to conduct field verification. | |
| Social Impact Assessment (SIA) | |
| PT Inti Indosawit Subur – Buatan POM has also shown the document of Social Impact Assessment PT Inti Indosawit Subur Kebun Buatan in Kabupaten Siak and Kabupaten Pelalawan Propinsi Riau, in 2009 by Fakultas Kehutanan Institut Pertanian Bogor. | |
| Assessment of aspects of social impacts was done by several methods, including: | |

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| | Focus Group Discussion (FGD) | |
|--|--|--|
| | Deep interview | |
| | Structured Interviews | |
| | | |
| | During preparation for Social Impact assessment team and company management have involved communities through interviews and meetings with village peoples, farmers, village officials and regency officials. Record of meeting with affected parties and stakeholder are available and can demonstrated. Evidence of participation with affected parties is to use a questionnaire conducted on 13- 19 April 2009, questionnaires can be demonstrated at the time of the audit. | |
| | Based on document verification, it is known that the social and environmental impact assessment has been carried out independently and participatively by involving affected stakeholders, including impact assessments from scheme smallholder. | |
| | The results of field observations during the audit activity show that all the company's operational activities have been included in the environmental documents owned by the company. | |
| | Based on interviews with representative of village officials, it is known that the social impacts of the company's existence include partnerships with business actors to provide business opportunities to the community, CSR, job opportunities, etc. These social impacts have also been identified in the SIA Document, Environmental Document, as well as the company's social impact management plan. | |
| | Based on document verification, it is known that the scope of the social impact assessment has covered all villages, farmers, and has involved internal workers. | |

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| 3.4.2 | For the unit of certification, a SEIA is available and social and environmental management plan and its monitoring have been developed with participation of affected stakeholders. - Minor compliance - | | Complied |
|-------|---|---|----------|
| | | There is no change in term of the statement of conformity when comparing from the previous audit result. Up to now since previous assessment last year till the date of this audit, the social environmental management plan have been developed with participation of affected stakeholder. Details of management plan can be seen in document "Rencana Pengelolaan Lingkungan" and dokumen "Rencana Kerja Lingkungan" consisted of: | |
| | | • Impact from main activities in oil palm plantation (spraying activity, natural vegetation conservation) | |
| | | • Impact from main activities in palm oil mill (utilization of palm oil mill manpower, FFB processing, palm oil mill effluent management, land application of palm oil mill effluent, application of empty fruit bunch, transport of crude palm oil, palm kernel and logistics, provision, and use of clean water). | |
| | | Impact from supporting activities (energy source operation, central workshop operation, temporary hazardous waste storage, landfill operation) | |
| | | Review and evaluation upon future activities, such as: | |
| | | Replanting activity, within the replanting activity review, team has identified type of impact such as: change in micro-climate, air quality decrease, increase of noise, dynamics in quantity and quality of surface water, erosion, and sedimentation, decrease in terrestrial | |

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| | | flora and fauna, disturbance in aquatic life, effect on community health. | |
|-------|--|--|----------|
| | | Social jealousy due to workers recruitment for replanting activities | |
| | | The document has also completed with environmental management and monitoring plan, gives description type of impact, source of impact, impact parameter, management objective, management/monitoring plan, period of management/monitoring, PIC for management/monitoring. | |
| | | For scheme smallholder, the type of environmental impact from their oil palm plantation such as: | |
| | | water pollution -> control the spraying and fertilizer application, | |
| | | avoid spraying near water body; | |
| | | soil erosion -> no blanket spraying, frond stacking, | |
| | | degradation on wildlife -> no hunting. | |
| | | The Social Environmental monitoring and management report reported in regular basis each semester in "Laporan Pelaksanaan Izin Lingkungan". The company has also reviewed the SIA management and monitoring plan which was carried out together with the surrounding community and workers as evidenced by showing questionnaire on 11 March 2024 which was given to stakeholders as input in determining social programs. The updated identification of problems and its management is available, the last update was on 26 June 2024. | |
| 3.4.3 | (C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in participatory way. - Critical (Major) compliance - | There are no changes regarding EIA and SIA assessment document compared to last year audit. Updating data or information about the monitoring report and its reporting to government. | Complied |

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| Based on Government Regulation No. 27/2012 concerning Environmental Permits Article 53 (1) and (2) states that the person in charge of business must prepare a report and submit a report on the implementation of environmental management activities every 6 months. This reporting period is still in accordance with the latest regulations (Government Regulation No. 22 of 2021 concerning Implementation of Environmental Protection and Management, Article 49 (6.f.6)). | |
|--|--|
| Social Environment management and monitoring plan as per RKL – RPL document has been implemented by PT Inti Indosawit Subur – Buatan Group. The evidence Lingkungan". Based on verification on Environmental management and monitoring report, confirmed that the management and monitoring plan has been well implemented accordingly. The document has also been reported to the relevant agency via SIMPEL KLHK RI (ID TTE 1721932486-1744, dated 25 January 2024). | |
| The environmental management and monitoring plan is in accordance with the environmental documents it has. The results of the verification of the implementation of the environmental management and monitoring plan for semesters 1 and 2 of 2023 are in accordance with the directions of the environmental documents owned. In general, the results of environmental management and monitoring are in accordance with the provisions. The company has also conducted evaluations such as trend evaluation, critical level evaluation, and compliance evaluation. Based on the results of interviews with the surrounding community, information was also obtained that there was no environmental pollution by the company. In addition, the results of the interview with the Environmental Service of Pelalawan Regency also explained that the company had carried out environmental management and monitoring and reported the results of the implementation of environmental management and monitoring to the Environmental Service. | |

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| | | In general, the results of environmental monitoring carried out by the company are in accordance with its environmental management and monitoring plan. In general, the results of the management of liquid waste have been effective, this can be seen from the test results which are still below the quality standard, besides that the temporary storage of hazardous waste has been carried out in accordance with relevant regulations. | |
|----------|--|---|----------|
| | | Sample of certificate analysis : | |
| | | • Surface water certificate analysis Number : D.07.2240-1/LHU/2023 dated 16 August 2023; conducted by KAN accredited laboratory (PT ITEC Solution Indonesia) located in Bogor, West Java; reference to PP RI No. 22/2021 (Lampiran VI) | |
| | | • Air ambient certificate analysis Number : D.07.2183/LHU/2023 dated 18 August 2023; conducted by KAN accredited laboratory (PT ITEC Solution Indonesia) located in Bogor, West java; reference to PP RI No. 22/2021 (Lampiran VII). The result shown comply with the regulation. | |
| | | • Workplace noise certificate analysis Number : D.07.2183/LHU/2023 dated 18 August 2023; conducted by KAN accredited laboratory (PT ITEC Solution Indonesia) located in Bogor, West java; reference to Permenaker No 5/2018). The result shown comply with the regulation. | |
| Criteria | a 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. | Until the surveillance audit 2.3, there have been no changes related to the processing 1. SOP recruitment and employee selection No. SOP: AA-HR-305.2-R0 dated 1 February 2009 regarding "penerimaan karyawan baru" | Complied |
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| - Minor compliance - | (recruitment and selection of employee), explained that: When candidates have passed in the process of selection, next recruitment sends the candidate in full data system averis into HR-it) to be made an agreement work (made 2 duplicate and should be sign by candidates in question. PT Inti Indosawit Subur – Buatan II POM and Estate has issued the specific labour policy and procedures for temporary workers |
|----------------------|---|
| | (PHL/PKWT); In the recruitment process, the company has set the standard of competence that inferred in the Position Description and Job Profile. Recruitment selection, hiring and promotion has based on skills, |
| | capabilities, qualities, and medical fitness. Taken as an example of the recruitment process at Buatan II POM on behalf of prospective worker Victor Daniel M. in September 2023, several required documents are in accordance with the recruitment procedure, including: |
| | Candidate employee data form in the name of Victor Daniel M Copy of KTP/ID in the name of Victor Daniel M Copy of Family Card in the name of Victor Daniel M Basic physical and health examination by the Asian Agri Healthy Buatan Clinic on 21 September 2023 Memorandum from Mill Manager Buatan II POM no. 248/MI- PBS/MEMO/IX/2023 dated 30 September 2023 concerning the Acceptance and Appointment of Non-Staff Workers (PHL). |
| | Recruitment at Simpang Perak Estate, there were 5 of prospective workers in February 2024, as follow: - Pruning worke: as much as 1 worker - FFB Loader as much as 1 worker |

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| · · · · · · · · · · · · · · · · · · · |
|---|
| - Harveser as much as 3 harvester |
| several required documents are in accordance with the recruitment procedure, including: |
| Candidate employee data form on behalf of 5 prospective workers Copy of KTP/ID in the name of 5 prospective workers Copy of Family Card in the name of 5 prospective workers Basic physical and health examination by the Asian Agri Healthy Buatan Clinic on 15 February 2024 on behalf of 5 prospective workers Memorandum from Mill Manager Buatan II POM no. 31/ES-KSP/MEMO/02/2024 dated 20 February 2024 concerning the Acceptance and Appointment of Non-Staff Workers (PHL). |
| The following verification is carried out related to worker promotions: |
| Simpang Perak Estate; There is 37 workers for period Y2023 and Y2024 related to promotion, for example: Hakim Rasyid AP as mechanic refers to Memorandum of HR No. 129/HR- RO2/MEMO/SK/06/2023 dated 30 June 2023; Sukron Sitanggang as harvester refers to Memorandum of HR No. 128/HR-RO2/MEMO/SK/06/2023 dated 30 June 2023; Peri Saputra as harvester refers to Memorandum of HR No. 126/HR- RO2/MEMO/SK/06/2023 dated 30 June 2023; Tono Manurung as FFB loader refers to Memorandum of HR No. 127/HR- RO2/MEMO/SK/06/2023 dated 30 June 2023. Kuswanto as harvester refers to Memorandum of HR No. 098/HR- RO2/MEMO/SK/01/2024 dated 1 January 2024; Budianto as harvester refers to Memorandum of HR No. 099/HR- RO2/MEMO/SK/01/2024 dated 1 January 2024; Faonasoki |

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| | | Waruwu as harvester refers to Memorandum of HR No. 100/HR-RO2/MEMO/SK/01/2024 dated 1 January 2024. Buatan II POM: There is 12 workers for period Y2023 and Y2024 related to promotion, for example: Slamet Miswanto as Production Clerk refers to Memorandum of HR No. 009/M-I-PBD/MEMO/SK/05/2023 dated 04 May 2023; Sitra Sejati as personalia/HR refers to Memorandum of HR No. 009/M-I- | |
|-------|---|---|----------|
| | | PBD/MEMO/SK/05/2023 dated 04 May 2023; Amrinto Nainggolan as sample boy refers to Memorandum of HR No. 051/M-I-PBD/MEMO/SK/05/2024 dated 14 May 2024; Lili Fadri as mechanic refers to Memorandum of HR No. 051/M-I- PBD/MEMO/SK/05/2024 dated 14 May 2024; Wilman Simanulang as operator refers to Memorandum of HR No. 051/M-I-PBD/MEMO/SK/05/2024 dated 14 May 2024; Zidan Ramdhani as operator refers to Memorandum of HR No. 051/M- I-PBD/MEMO/SK/05/2024 dated 14 May 2024. | |
| | | Procedures, recruitment records and employee promotion documents are available and verifiable at the time of the audit. | |
| 3.5.2 | Employment procedures are implemented and records are maintained. - Minor compliance - | Until the surveillance audit 2.3, there have been no changes related to the processing 1. SOP recruitment and employee selection No. SOP: AA-HR-305.2-R0 dated 1 February 2009 regarding "penerimaan karyawan baru" (recruitment and selection of employee), explained that: When candidates have passed in the process of selection, next recruitment sends the candidate in full data system averis into HR-it) to be made an agreement work (made 2 duplicate and should be sign by candidates in question. | Complied |

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| 2. PT Inti Indosawit Subur – Buatan II POM and Estate has issued the |
|---|
| specific labour policy and procedures for temporary workers (PHL/PKWT); |
| In the recruitment process, the company has set the standard of competence that inferred in the Position Description and Job Profile. Recruitment selection, hiring and promotion has based on skills, capabilities, qualities, and medical fitness. |
| Taken as an example of the recruitment process at Buatan II POM on behalf of prospective worker Victor Daniel M. in September 2023, several required documents are in accordance with the recruitment procedure, including: |
| Candidate employee data form in the name of Victor Daniel M Copy of KTP/ID in the name of Victor Daniel M Copy of Family Card in the name of Victor Daniel M Basic physical and health examination by the Asian Agri Healthy Buatan Clinic on 21 September 2023 Memorandum from Mill Manager Buatan II POM no. 248/MI- PBS/MEMO/IX/2023 dated 30 September 2023 concerning the Acceptance and Appointment of Non-Staff Workers (PHL). |
| Recruitment at Simpang Perak Estate, there were 5 of prospective workers in February 2024, as follow: - Pruning worke: as much as 1 worker - FFB Loader as much as 1 worker - Harveser as much as 3 harvester |
| several required documents are in accordance with the recruitment procedure, including: - Candidate employee data form on behalf of 5 prospective |

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| Copy of KTP/ID in the name of 5 prospective workers Copy of Family Card in the name of 5 prospective workers Basic physical and health examination by the Asian Agri Healthy Buatan Clinic on 15 February 2024 on behalf of 5 prospective workers Memorandum from Mill Manager Buatan II POM no. 31/ES- KSP/MEMO/02/2024 dated 20 February 2024 concerning the Acceptance and Appointment of Non-Staff Workers (PHL). |
|--|
| The following verification is carried out related to worker promotions: |
| Simpang Perak Estate; There is 37 workers for period Y2023 and Y2024 related to promotion, for example: Hakim Rasyid AP as mechanic refers to Memorandum of HR No. 129/HR- RO2/MEMO/SK/06/2023 dated 30 June 2023; Sukron Sitanggang as harvester refers to Memorandum of HR No. 128/HR-RO2/MEMO/SK/06/2023 dated 30 June 2023; Peri Saputra as harvester refers to Memorandum of HR No. 126/HR- RO2/MEMO/SK/06/2023 dated 30 June 2023; Tono Manurung as FFB loader refers to Memorandum of HR No. 127/HR- RO2/MEMO/SK/06/2023 dated 30 June 2023. Kuswanto as harvester refers to Memorandum of HR No. 098/HR- RO2/MEMO/SK/01/2024 dated 1 January 2024; Budianto as harvester refers to Memorandum of HR No. 099/HR- RO2/MEMO/SK/01/2024 dated 1 January 2024; Faonasoki Waruwu as harvester refers to Memorandum of HR No. 100/HR- RO2/MEMO/SK/01/2024 dated 1 January 2024. |
| Buatan II POM: There is 12 workers for period Y2023 and Y2024 related to promotion, for example: Slamet Miswanto as Production Clerk refers to Memorandum of HR No. 009/M-I- |

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| Criteria | 3.6: An Occupational health and safety (H&S) plan is documented, effective | PBD/MEMO/SK/05/2023 dated 04 May 2023; Sitra Sejati as personalia/HR refers to Memorandum of HR No. 009/M-I- PBD/MEMO/SK/05/2023 dated 04 May 2023; Amrinto Nainggolan as sample boy refers to Memorandum of HR No. 051/M-I-PBD/MEMO/SK/05/2024 dated 14 May 2024; Lili Fadri as mechanic refers to Memorandum of HR No. 051/M-I- PBD/MEMO/SK/05/2024 dated 14 May 2024; Wilman Simanulang as operator refers to Memorandum of HR No. 051/M-I-PBD/MEMO/SK/05/2024 dated 14 May 2024; Zidan Ramdhani as operator refers to Memorandum of HR No. 051/M- I-PBD/MEMO/SK/05/2024 dated 14 May 2024; Zidan Ramdhani as operator refers to Memorandum of HR No. 051/M- I-PBD/MEMO/SK/05/2024 dated 14 May 2024. Procedures, recruitment records and employee promotion documents are available and verifiable at the time of the audit. | |
|----------|---|--|----------|
| 3.6.1 | (C) All operational activities risks assessed to identify the H&S issues. Mitigation plans and procedures are documented and implemented. - Critical (Major) compliance - | Certificate Holder has established the health and safety policy under "Kebijakan Perusahaan", signed by Managing Director of Asian Agri Group, on 1 st December 2019 Point 3. Committed to implement and maintain occupational health and safety management system in compliance with national and international applicable regulation. The policy has not changes during this surveillance audit. The policy was communicated to all employees and displayed at strategic locations of Mill and Estates and communicated to employees including contractor workers. OHS risk assessment procedure SOP " <i>Identifikasi bahaya, Penilaian Resiko dan Penentuan Pengendalian</i> " " AA-SOP-HSE-03 R0 dated 20 May 2018 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. | Complied |

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Risk assessment method used is guantitative and gualitative method which is the multiplication of severity with the level of possibility. The company has set matrix multiplication result, which is subsequently determined from the matrix level/quality risk is divided into five (5) categories: extreme, high, moderate, low and tolerance/permitted. OHS training has been programmed and provided and balanced with OHS hazard and risk at Mill and Estates. Basic OHS training performed internally by safety officer in charge at mill and estate, the training record and programme related to OHS were sighted and verified during this audit ASA 2.3. e.g. licenses for boiler operator, licence for operator of generator set, licence of heavy equipment operator, pesticide training for sprayers, etc. Risk Assessment presented in document of HIRADC - last review in 9 January 2024 covering for all activities both in Buatan II POM, Estate and scheme smallholder, such as: boiler operation, sterilizer operation, generator set operation, loading ramp activity, cleaning of CPO storage tank, chemical mixing, fertilizer warehouse, herbicide, and pesticide sprayer, harvesting, road maintenance, HCV Monitoring, Boundary Monitoring, land application maintenance etc. Mitigation plan to eliminate the risk and control the risk has been determined in the HIRADC document. Mitigation plan to reduce and minimize the risk impact has been develop by company covering: • Elimination of risk. One of elimination risk is arrangement of FFB truck vehicles on loading ramp by installing barriers sign to maintain a safe distance between cars and workers. Substitution of material and process. Engineering control. • Administrative control. Administrative control was performed by employee mutation/rotation, sanction for safety rules violation.

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| | Safety inspection was performed regularly to ensure the compliance of safety regulation. |
|---|---|
| | Personal protective equipment. Company has provide PPE for all workers according to the type of work and risk. |
| | PT Inti Indosawti Subur – Buatan II POM has prepared and documented the OHS Plan as in "Program Manajemen K3 Tahun 2024", such as: |
| | Reducing the risk of work accidents: First aid training, basic safety training, basic fire training |
| | Arrangement of the Assignment of First Aid Officers to the Manpower Office |
| | Checking Apar, Hydrant, Evacuation Route, Assembly Point, Evacuation Controller Flag |
| | Carry out a "Drill" for handling land fires and assess the readiness and measure the effectiveness of the Emergency Response Team's work |
| | Safety induction and dissemination of SOP to new employees |
| | Safety briefing |
| | PPE monitoring checklist |
| | Scheme Smallholder: |
| | During audit document HIRADC document for cooperative were available and could be demonstrated (as stated above). |
| | Mitigation plan to eliminate or reduce the hazard and risk has been develop according to HIRAC as per "Alternatif Kontrol Resiko untuk Tindakan Perbaikan". |
| | An OHS plan year 2023/2024 has prepared as per "Rencana K3 (Keselamatan dan Kesehatan Kerja) majority to provide and control use of PPE, including socialization and monitoring, program such as: |
| | Inspection and monitoring on using of PPE for harvester – daily |
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| | | Training on emergency and preparedness – once a year Training of first aider and monitoring of first aid kit Refresh training of OHS including risk assessment. The implementation of risk analysis and risk control can be demonstrated during field audit such as: PPE provision for harvester (helmet, safety boot, glasses and handgloves, egrek cover), OHS awareness for harvester and smallholder member. | |
|-------|--|---|----------|
| 3.6.2 | (C) The effectiveness of the H&S plan to address health and safety risks to people is monitored. - Critical (Major) compliance - | H&S Plan addressing health and safety risk of people are monitored as below: PPE usage monitoring: PPE monitoring performed in daily basis by each department. PPE monitoring present in "Checklist Penggunaan APD". PPE monitoring period 2023 and 2024 can be demonstrated during audit. OHS inspection conducted each month by OHS expert and team each month. OHS inspection covering: PPE usage inspection, unsafe action and unsafe condition in area of: Workshop, harvesting, spraying working, manuring, housing. OHS inspection schedule 2024 were sighted. Safety committee meeting conducted each month to review the effectiveness of OHS program and to discuss the OHS issue. Minutes of Safety committee meeting are available and reported in P2K3 report. Document verified for safety committee meeting period January – June 2024. Based on field visit during onsite audit for spraying workers it was found that sprayer has using appropriate PPE (eye wear/safety glasses, mask, and hand gloves) to mitigate the risk and regular training for sprayer workers are conducted by Buatan Estate management. Discipline of PPE usage monitoring regularly conducted by Estate management to ensure all workers use the appropriate PPE during working. Monitoring record present in "Daftar Pemeriksaan Alat | Complied |

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| Pelindung Diri (APD)". Sample seen for PPE monitoring of fertilizer workers, spraying workers and harvester period January – June 2024. |
|--|
| Based on interview with worker in pesticides application, method to minimizing risk and negative impact i.e: - Mixing of chemical conducted by trained person (Supervisor). There were aims to ensuring proper dosage, type of pesticide use Using of PPE while chemical mixing. Mixing of chemical located in mixing area, side by side with the chemical storage. Effectiveness of OHS implementation was reported in P2K3 report which submitted to Manpower office Pelalawan Regency and Riau Province. Report submission receipt can be shown during audit. Sample |
| seen report P2K3 period July – December 2023 and January – June 2024. |
| In addition, monitoring of the effectiveness of the H&S plan has been carried out, here is an example of such monitoring through: |
| Minutes of inspection and testing from PT Mahardika Argi Kencana (Marka Ispection) on 3 April 2024 with number: 036/BA- MARKA/IV/2024 and on 28 June 2024 with number: 058/BA- MARKA/VI/2024 for testing Steam Turbine, Sterillizer, BPV, Steam sparator, Daerator, Diesel motor, Gas engine for biogas, electrical installation, lightning distributor installation, tractor, and becho loeder. |
| Handover of PPE to plantation and mill employees in the form of safety shoes, masks, ear plugs, gloves, glasses, face shields, helmet for example in August - December 2023 and January, March - July 2024. |
| 3. AK3U Training on 6 July 2024 |
| 4. Periodic medical check-ups for fertilizer and spray employees, the latest in June 2024. |
| 5. Work environment inspection (noise, odor, vibration, workspace climate) conducted on 11-14 January 2024. |

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| Criteria 3 | 3.7: All staff, workers, Scheme Smallholders, outgrowers, and contract work | Monitoring of emergency equipment (fire extinguisher, first aid hydrant) is carried out every month. Periodic training of sprayers is conducted annually, the latest on 12 February 2024. Periodic training of first aid officers is carried out every year, the latest on 29 January 2024. | |
|------------|--|---|----------|
| 3.7.1 | (C) A documented programme that provides training is in place, which is accessible to all staff, workers, scheme smallholders, and outgrowers taking into account gender- specific needs, and which covers applicable aspects of P&C Principles, in a form they understand and includes assessment of the training. - Critical (Major) compliance - | The company has a department which is responsible for the training program, which is the Asian Agri Learning Institute. The department has a 2023/2024 training program recorded in the year 2023/2024 training calendar including Estate and Mill. Through its employee data (master of employees) and training data personal records, the Asian Agri Learning Institute Department will recommend the Estate and Mill to participate in a training program annually and will also evaluate the effectiveness of the training that has been followed. The training program is divided into several aspects: technical, Administration, Environments & Sustainability and special certifications and there are also training involving vendors or operational suppliers. There is no discrimination for female to attend the training. Here is the training plan for 2024: 1. Basic fire training 2. Refresh fertilization SOP 3. Refresh Harvest SOP 4. Refresh Spray SOP 5. Fire SPBK and fire administration training 6. Inspection and observation training | Complied |

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| | | | 1 |
|-------|---|--|----------|
| | | 7. Plant pest and disease training | |
| | | 8. Sustainability awareness training | |
| | | 9. Refresher on online laws and regulations | |
| | | 10. Plantation Management System training | |
| | | 11. Transport management training | |
| | | 12. Training on administration SOPs | |
| | | 13. CI training | |
| | | 14. Investigation Training | |
| | | 15. AK3U Training | |
| | | 16. ISPO Auditor training refresh | |
| | | 17. Hazardous Waste Storage Warehouse Training | |
| | | 18. JSA Training | |
| 3.7.2 | Records of training are maintained, where appropriate on an individual basis. | The training realizes based on the Training calendar period 2023/2024, among others: | Complied |
| | - Minor compliance - | 1. AK3U Training on 14 May and 6 July 2024. | |
| | | 2. Pesticide sprayer training on 12 February 2024. | |
| | | 3. Training of first aid officers on 29 january 2024. | |
| | | 4. Plant Pest Disease Training on 14 February 2024 | |
| | | 5. Harvest and fertilization safety training on 15 February 2024 | |
| | | 6. Emergency response training/simulation on 29 May 2024 | |
| | | The company has also made recording for all trainings that have been attended by employees in the recording of "Personal Data Training". | |
| | | Some documents can be shown at the time of the audit as proof is: the Calendar Training document period 2024, the list of participants attending the trainees, and some photographs of the activities at the time of training. | |



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| 3.7.3 | Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed. - Minor compliance - | Training for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS) has been carried out regularly by company, latest refreshment training conducted on 16 October 2023; the training is carried out every year to refresh the member's knowledge. 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). During interview with weighbridge Clerk, mill manager, dispatch operator and KTU (head of administration) confirmed that they has understanding on RSPO supply chain. | Complied |
|-------|---|---|-------------------|
| | 3.8: Supply chain requirements for mills. e note: all requirements are classified as Critical Indicators. However it will n | ot 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. | Based on document review and interview to the Mill Manager, it was known that Buatan II 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. | 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 | PT. Inti Indosawit Subur – Buatan II POM holds current RSPO P&C Certificate No. RSPO 638947, first certification start on 16/09/2010 and current certificate issued on 12/08/2021 and expired on 11/08/2026. In the current certificate, PT. Inti Indosawit Subur – Buatan II POM uses Mass Balance supply chain model. The mill only claimed the FFB | Complied |

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| | claim only the volume of oil palm products produced from processing of the certified FFB as MB. | proportion from certified supply bases which comprise of company-own estate (Simpang Perak Estate) and 8 Scheme smallholder in form of cooperative/Koperasi Unit Desa (KUD). Supply FFB from other certified unit is come from Buatan Estate (under same company PT Inti Indosawit Subur). | |
|-------|---|---|----------|
| 3.8.3 | The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report. | The estimated tonnage of certified CPO and PK that could potentially produce by PT. Inti Indosawit Subur – Buatan II POM its recorded in RSPO Public Summary report, certificate and RSPO IT Platform. The mill has met registration and reporting requirement as it registered in RSPO IT Platform (PalmTrace) with ID number RSPO_PO1000000148. Below are the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year 2023/2024: Forecast volume Buatan II POM (Aug 2023 – July 2024) FFB : 190,605.00 MT CPO : 32,993.73 MT (OER: 17.31 %) PK : 8,958.44 (KER: 4.70%) There is extension volume in palmtrace: 47,000MT of FFB, 10,000MT of CSPO and 2,303MT of CSPK. So, total FFB: 237,605.00 MT, CSPO 42,993.73 MT and CSPK 11,261.44MT. Actual production volume Buatan II POM (July 2023 – June 2024) FFB: 158,077.64 MT (Simpang Perak Estate + Scheme smallholders Buatan II) and 48,312.26 MT (from Buatan Estate-supply bases Buatan I POM), so FFB total 206,389.90 MT. CPO: 32,951.67 MT (from Simpang Perak Estate + Scheme smallholders Buatan II), 10,042.03 (from Buatan Estate-supply bases Buatan I POM), so total is 42,993.70 MT (OER 20.83%). | Complied |

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| 3.8.4 | The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform. | PK: 7,246.09 MT (Simpang Perak Estate + Scheme smallholders Buatan II), 2,216.24 MT (from Buatan Estate-supply bases Buatan I POM), so the total is 9,462.33MT (KER 4.58%). PT. Inti Indosawit Subur – Buatan II 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 Inti Indosawit Subur – Buatan II POM has meet all registration and reporting requirements. | Complied |
|-------|---|---|----------|
| 3.8.5 | Documented procedures The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following: a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill's procedures for the implementation of this standard. d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill. | RSPO IT Platform/PalmTrace account RSPO_ PO1000000382. During this audit ASA2.3, there is no changing on the procedure of company related to supply chain implementation. PT. Inti Indosawit Subur – Buatan II POM can demonstrate procedures as follow: 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 Simpang Perak Estate and Smallholder, processing up to shipping of CPO and PK as well as daily production report. The procedure also regulates the internal audit by Sustainability Internal Audit Manager. Traceability records are to be kept for 10 years. Standard Operating Procedure – Book Keeping (AA-MPM-OP-1400.18-R4). The procedure explains method to check only certified product received. The book keeping mass balance stated every 3 months: January-March, April-June, July-September, and October-December each year. Head of Environment and Sustainability will inform to Certification Body in the case of projected overproduction. SOP for mill operation Mill Policy Manual: SOP AA-MPM-OP-1400.02.R2 Stasiun Penerimaan for FFB receiving station; | Complied |

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| - SOP AA-SOP-OP-101.5-R0 Grading; |
|--|
| - SOP AA-MPM-OP-1400.03.R1 Stasiun Rebusan for sterilizer; |
| SOP AA-MPM-OP-1400.04.R1 Stasiun Pemisahan Berondolan for loose fruit separation; |
| SOP AA-MPM-OP-1400.05-R1 Stasiun Pengadukan dan Pengempaan for pressing station; |
| SOP AA-MPM-OP-1400.06-R1 Stasiun Pemurnian for clarification; |
| SOP AA-MPM-OP-1400.07-R1 Stasiun Pemisahan Nut dan Fiber for nut and fiber separation; |
| SOP AA-MPM-OP-1400.08-R1 Stasiun Kernel for kernel station; |
| - SOP AA-MPM-OP-1400.09-R1 Stasiun Boiler; |
| - SOP AA-MPM-OP-1400.10-R1 Stasiun Engine Room; |
| - SOP AA-MPM-OP-1400.11-R1 Stasiun Water Treatment; |
| - SOP AA-MPM-OP-1400.12-R1 Laboratorium; |
| SOP AA-MPM-OP-1400.13-R1 Stasiun Pengelolaan Limbah for palm oil mill effluent treatment; |
| SOP AA-MPM-OP-1400.14-R2 Stasiun Penimbunan dan Pengiriman CPO dan Kernel for CPO and PK bulking and despatch operation; |
| SOP AA-MPM-OP-1400.15-R1 Perawatan for preventive maintenance; |
| - SOP AA-MPM-OP-1400.18-R4 Book Keeping |
| - SOP AA-MPM-OP-1400.17-R7 Traceability |
| PT. Inti Indosawit Subur – Buatan II POM is able to demonstrate complete and up-to-date records and report demonstrating compliance |

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| | | with the supply chain's general requirement and modular requirement, including training records. As per Procedure of Traceability (AA-MPM-OP-1400.17-R6), the responsible person in charge to the supply chain system is Mill Manager. During audit, the mill manager is able to demonstrate sufficient knowledge and understanding on RSPO supply chain implementation for palm oil mill. PT IIS Buatan II POM has a procedures for receiving and processing certified and non-certified FFBs as described in SOP AA-MPM-OP- | |
|-------|--|--|----------|
| | | 1400.17-R7 Traceability, dated 1 October 2019. However Buatan II POM was apply Mass Balance system. | |
| 3.8.6 | Internal Audit i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill; a) Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. b) Effectively implements and maintains the standard requirements within its organisation. 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. | PT. Inti Indosawit Subur – Buatan II POM has a procedure to conduct internal audit RSPO, including RSPO SCCS as per Procedure of Traceability (AA-MPM-OP-1400.17-R7) chapter 6.7, Sustainability Internal Audit Manager conducted internal audit annually, to ensure all operational and documentation activities are comply with the requirement in RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. Internal audit for all scheme including RSPO SCCS also refer to SOP Internal Audit Nomor: AA-SOP-ES-6001-R5 dated 1 August 2020; Chapter 4.0 stated that Internal audit conducted minimum once a year considering the critical area. Latest internal audit conducted on 18 – 23 March 2024. The report available under document "Internal Audit Sustainability Integrasi". Management review dated 28 March 2024, was attended by Technical Controller, POM Manager, Sustainability Staff. Document of Management Review available and recorded in minutes of meeting: - Internal audit result; - Customer feedback; | Complied |

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| | | Proses performance and product conformity; Status of Corrective and Preventive Action; Follow up previous management review; Change that could effect to the management system.` Output of management review has include: Recommendation for improvement Resources needed. | |
|-------|---|--|----------|
| 3.8.7 | Purchasing and Goods In i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received. ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage. iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents. | PT Inti Indosawit Subur – Buatan II POM has demonstrated SOP of Traceability (AA-MPM-OP-1400.7.R7), chapter 5.1 indicates the Weighbridge Clerk has responsibility to input data and print weighbridge card based on "Surat Pengantar TBS", covering information e.g. estate name and block number, mill name, date of delivery, product description and quantity, RSPO certificate number, transporter identity and unique identification number. PT. Inti Indosawit Subur – Buatan II POM holds current RSPO P&C Certificate No. RSPO 638947, first certification start on 16/09/2010 and current certificate issued on 12/08/2021 and expired on 11/08/2026. In the current certificate, PT. Inti Indosawit Subur – Buatan II POM uses Mass Balance supply chain model. The mill only claimed the FFB proportion from certified supply bases which comprise of company-own estate (Simpang Perak Estate) and 9 scheme Smallholder in form of cooperative/Koperasi Unit Desa (KUD) and other certified unit Buatan Estate under same company PT Inti Indosawit Subur. There is no non certified external FFB supplier since latest audit until audit ASA2.3. The company have a system to inform CB for projected overproduction in place and how it is implemented and mechanism for handling non- conforming FFB and/or documents as stated in indicator 3.8.5 above. During audit ASA2.3 there is no overproduction of certified volume from supply bases Buatan II POM. | Complied |

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| Document "Surat Pengantar TBS" (FFB Delivery Note) and Kartu Timbangan (Weighbridge Card) described identity and location of FFB source and other item required e.g. |
|--|
| Certified FFB: |
| Weighbridge ticket "Kartu Timbangan No.PBDA124110253 dated 18/06/2024, for 740 FFB bunches; nett weight 6,430 kg; from Kebun Simpang Perak Afdeling 1, block A15h, A17j, A17k, A17l, A17m; vehicle number BM9127XY; Driver: Anton Siagian; RSPO certificate No.RSPO638947. |
| Weighbridge ticket "Kartu Timbangan No.PBDA124111015 dated 03/07/2024, for 339 FFB bunches; nett weight 564 kg; from Kebun Buatan, block B19d, B19c; vehicle number BM8278TZ; Driver: Sahat Nababan; RSPO certificate No.RSPO638947. |
| Weighbridge ticket "Kartu Timbangan No.PBDA124109871 dated 08/06/2024, for 656 FFB bunches; nett weight 5,250 kg; from Kebun Buatan, block C18c, C18l; vehicle number BM9249QB; Driver: Ahmad Supriadi; RSPO certificate No.RSPO638947. |
| Weighbridge ticket "Kartu Timbangan No.PBDA124109875 dated 08/06/2024, for 182 FFB bunches; nett weight 4,350 kg; from Kebun Simpang Perak Afdeling-3, block C91g; vehicle number BM8098TK; Driver: Rahmat Pausi; RSPO certificate No.RSPO638947. |
| • Weighbridge ticket "Kartu Timbangan No.PBDA224104956 dated 01/07/2024, for 255 FFB bunches; nett weight 5,578 kg; from Kebun KUD Tani Rukun, KT 211 Melon; vehicle number BM9231SF; Driver: Karman; RSPO certificate No.RSPO638947; ID KPB; delivery note number 211. |
| Weighbridge ticket "Kartu Timbangan No.PBDA224104953 dated 01/07/2024, for 473 FFB bunches; nett weight 9,862 kg; from KUD Makarti Sawit, KT 187 Gunung Slamet; vehicle number BM8184SC; Driver: Habib; RSPO certificate No.RSPO638947; ID KPB; delivery |

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| | | note number 187. Weighbridge ticket "Kartu Timbangan No.PBDA224104958 dated 01/07/2024, for 400 FFB bunches; nett weight 9,100 kg; from KUD Mitra Usaha, KT 156 Bumi Makmur; vehicle number BM9078YU; Driver: Pantas; RSPO certificate No.RSPO638947; ID KPB; delivery note number 0156. Weighbridge ticket "Kartu Timbangan No.PBDA124112015 dated 29/07/2024, for 410 FFB bunches; nett weight 5,682 kg; from KUD Bhirawa Bhakti, Plasma Pre Konversi Afd 1; vehicle number BM8287SU; Driver: Agus Julianto; RSPO certificate No.RSPO638947; ID KVB-1; delivery note number 0087. | |
|-------|---|---|----------|
| 3.8.8 | Sales and Goods Out The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation): a) The name and address of the buyer; b) The name and address of the seller; c) The loading or shipment / delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation; | PT Inti Indosawit Subur – Buatan II Palm Oil Mill has ensure that the following minimum information for RSPO certified products is made available in document form such as: Sales contract, Delivery Order/Delivery notes and Weighbridge Ticket. The information are completed and can be presented across a range of documents issued for RSPO certified oil palm products. Sample seen: CSPO Contract, Delivery Order and Weighbridge ticket: Sales Contract No. 10077/CC10/02/23 dated 26 Oct 2023. Buyer name: PT Sari Dumai Oleo; Buyer address; Jl. Pulama RT.015 RW.000, Lubuk Gaung Sungai Sembilan Kota Dumai Riau 28826; Delivery date: Soonest; Quantity: 500 MT; Comodity: RSPO Certified CPO; SC Model: Mass Balance; Certificate Number: RSPO 638947; Specification: FFA max 5%, Moisture and impurities max 0.5%; Price: IDR ***; Seller: PT Inti Indosawit Subur; Seller address: Jl. Palembang Kav 35 – 37, Kebon Melati, Tanah Abang, Kota Adm. Jakarta Pusat, DKI Jakarta 10230; Destination port: Jl. Pulama RT.015 RW.000, Lubuk Gaung Sungai Sembilan Kota Dumai Riau 28826. The sales contract was defined into delivery orders: Delivery Order PT. Inti Indosawit Subur No.10077/DC10/02/23 dated 26/10/2023, | Complied |

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| i) A unique identification number. | instruction to PT. Inti Indosawit Subur – Buatan II POM to deliver 500,000 kg commodity Minyak Kelapa Sawit RSPO (CSPO); Supply Chain Model Mass Balance; No.Ref. RSPO 638947. |
|------------------------------------|---|
| | Delivery Order No. 10077/DC10/02/23 dated 26/10/2023, completed with 18 deliveries. Sample dispatch slip CSPO from Buatan II POM to customer: |
| | ✓ Weighbridge ticket Buatan II POM No.PBDC123201471 dated 30/10/2023. Destination PT. Sari Dumai Oleo. Commodity CPO Certified RSPO. Supply Chain Model Mass Balance. RSPO Certificate No.RSPO 638947. DO No. 10077/DC10/02/23. Transporter CV Mitra Transport, Vehicle No.BK8072DA, Driver: Adi Parwoto. Volume dispatched netto 28,370 kg; Seal No. 6714617-6714623. |
| | This transaction was recorded in PalmTrace as TR-b1d7658d-90d1, TR- 74108f38-1797 and TR-319f70f2-7511, confirmation date 08/05/2024. |
| | Sales Contract No. 06007/CC10/02/23 dated 5 June 2023. Buyer name: PT Sari Dumai Sejati; Buyer address; Jl. Palembang Kav 35 – 37, Kebon Melati, Tanah Abang, Kota Adm. Jakarta Pusat, DKI Jakarta 10230; Delivery date: Soonest; Quantity: 750 MT; Comodity: RSPO Certified CPO; SC Model: Mass Balance; Certificate Number: RSPO 638947; Specification: FFA max 5%, Moisture and impurities max 0.5%; Price: IDR ***; Seller: PT Inti Indosawit Subur; Seller address: Jl. Palembang Kav 35 – 37, Kebon Melati, Tanah Abang, Kota Adm. Jakarta Pusat, DKI Jakarta 10230; Destination port: Jl. Pulama RT.015 RW.000, Lubuk Gaung Sungai Sembilan Kota Dumai Riau 28826. |
| | - Delivery Order No. 06007/DC10/02/23 dated 05/06/2023, completed with 27 deliveries. Sample dispatch slip CSPO from Buatan II POM to customer: |
| | ✓ Weighbridge ticket Buatan II POM No.PBDC123200749 dated 06/06/2023. Destination PT. Sari Dumai Sejati. Commodity CPO |

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| Certified RSPO. Supply Chain Model Mass Balance. RSPO Certificate No.RSPO 638947. DO No. 06007/DC10/02/23. Transporter CV Jasa Sahabat Abadi, Vehicle No.BK9366VW, Driver: Zulkarnain. Volume dispatched netto 30,690 kg; Seal No. 6561012-6561018. |
|---|
| This transaction was recorded in PalmTrace as TR-TR-3ff3bfb1-4c44, dated 17 June 2023. |
| Sales Contract No. 04003/CC10/13/23 dated 5 June 2023. Buyer name: PT Sari Dumai Sejati; Buyer address; Jl. Palembang Kav 35 – 37, Kebon Melati, Tanah Abang, Kota Adm. Jakarta Pusat, DKI Jakarta 10230; Delivery date: Soonest; Quantity: 750 MT; Comodity: RSPO Certified CPO; SC Model: Mass Balance; Certificate Number: RSPO 638947; Specification: FFA max 5%, Moisture and impurities max 0.5%; Price: IDR ***; Seller: PT Inti Indosawit Subur; Seller address: Jl. Palembang Kav 35 – 37, Kebon Melati, Tanah Abang, Kota Adm. Jakarta Pusat, DKI Jakarta 10230; Destination port: Jl. Pulama RT.015 RW.000, Lubuk Gaung Sungai Sembilan Kota Dumai Riau 28826. |
| PK Sales Contract/Delivery Order: |
| Mostly PK from PT Inti Indosawit Subur – Buatan II POM was deliver and process in Buatan I Kernel Crushing Plant (same company). |
| Delivery Order PT. Inti Indosawit Subur No.06310/DC10/13/23 dated 26/06/2023; From: PT Inti Indosawit Subur – Buatan II POM, To: PT Inti Indosawit Subur – KCP Buatan I; Comodity: Palm Kernel; Quantity: 200,000 Kg; Supply Chain model: Mass Balance; Certificate number RSPO 638947. This DO fulfilled with 10 deliveries. Sample dispatch slip CSPK from Buatan II POM to customer: |
| ✓ Weighbridge Ticket No. PBDC223200263 dated 26/06/2023. Destination PT. Inti Indosawit Subur – Buatan I KCP. Commodity PK Certified RSPO. Supply Chain Model Mass Balance. RSPO Certificate No.RSPO638947. DO No. 06310/DC10/13/23. |

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| Transporter: own truck, Vehicle No.B9229PYX. Volume dispatched 20,880 kg. Seal No.6560083-6560085, 6560088 - 6560090. |
|--|
| This transaction was recorded in PalmTrace as TR-7879b249-7858, dated 24/08/2023. |
| Another sample of dispatch slip CSPK from Buatan II POM to customer Buatan I KCP: |
| ✓ Weighbridge Ticket No. PBDC223200234 dated 08/06/2023. Destination PT. Inti Indosawit Subur – Buatan I KCP. Commodity PK Certified RSPO. Supply Chain Model Mass Balance. RSPO Certificate No.RSPO638947. DO No. 05313/DC10/13/23. Transporter: Buana Jaya Bersama, Vehicle No.BM9544RC. Volume dispatched 20,530 kg. Seal No.6561138-6561151. |
| ✓ Weighbridge Ticket No. PBDC223200371 dated 08/09/2023. Destination PT. Inti Indosawit Subur – Buatan I KCP. Commodity PK Certified RSPO. Supply Chain Model Mass Balance. RSPO Certificate No.RSPO638947. DO No. 09303/DC10/13/23. Transporter: Own truck, Vehicle No.B922PYX. Volume dispatched 21,690 kg. Seal No.6620582-6620588. |
| ✓ Weighbridge Ticket No. PBDC223200290 dated 14/07/2023. Destination PT. Inti Indosawit Subur – Buatan I KCP. Commodity PK Certified RSPO. Supply Chain Model Mass Balance. RSPO Certificate No.RSPO638947. DO No. 07305/DC10/13/23. Transporter: Own truck, Vehicle No.B922PYX. Volume dispatched 20,500 kg. Seal No.6558080-6558085. |
| ✓ Weighbridge Ticket No. PBDC223200482 dated 24/11/2023. Destination PT. Inti Indosawit Subur – Buatan I KCP. Commodity PK Certified RSPO. Supply Chain Model Mass Balance. RSPO Certificate No.RSPO638947. DO No. 11305/DC10/13/23. Transporter: Buana Jaya Bersama, Vehicle No.BM9544RC. |

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| | | Volume dispatched 20,580 kg. Seal No.6711178-671187. ✓ Weighbridge Ticket No. PBDC223200408 dated 05/10/2023. Destination PT. Inti Indosawit Subur – Buatan I KCP. Commodity PK Certified RSPO. Supply Chain Model Mass Balance. RSPO Certificate No.RSPO638947. DO No. 10302/DC10/13/23. Transporter: Buana Jaya Bersama, Vehicle No.BM9544RC. Volume dispatched 20,220 kg. Seal No.6622122-6622131. | |
|-------|--|--|----------|
| 3.8.9 | Outsourcing Activities 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 | PT. Inti Indosawit Subur – Buatan II POM not outsource its milling activities however operate subcontractor for CPO and PK transporter. The appointed outsourced company is PT Buana Jaya Bersama, CV Jasa Bersama and CV Jasa Sahabat Abadi. PT. Inti Indosawit Subur – Buatan II POM having legal ownership of | Complied |
| | with relevant requirements of this RSPO Supply Chain Certification.ii) The mill shall ensure the following: | material being transported by appointed outsourced companies: CV Jasa Sahabat Abadi, CV Buana Jaya Bersama & CV Jasa Bersama. | |
| | a) The mill has legal ownership of all input material to be included in outsourced processes | PT. Inti Indosawit Subur – Buatan II POM have a contract agreement with transporter as below: | |
| | 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 | "Perjanjian Pengangkutan Nomor: 06/VI/BJB-IIS/2020" dated 4 June 2020 between PT Inti Indosawit Subur – Buatan I POM and PT Buana Jaya Bersama. Contract transport for CPO & PK. | |
| | that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.c) The mill has a documented control system with explicit procedures | "Perjanjian Pengangkutan Nomor: 05/VI/JB-IIS/2020" dated 4 June 2020 between PT Inti Indosawit Subur – Buatan I POM and CV Jasa Bersama. Contract transport for CPO & PK. | |
| | for the outsourced process which is communicated to the relevant contractor.d) The mill shall furthermore ensure (e.g. through contractual | "Perjanjian Pengangkutan Nomor: 03/VI/JSA-IIS/2020" dated 4 June 2020 between PT Inti Indosawit Subur – Buatan I POM and CV Jasa Sahabat Abadi. Contract transport for CPO & PK. | |
| | 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. | Contract agreement are signed and enforceable by both parties. According to contract agreement article 7 pont 1.m stated that "Bersedia memenuhi persyaratan sistem sertifikasi rantai pasok saat pengangkutan bahan baku dan bersedia untuk diaudit oleh auditor | |

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| internal perusahaan dan auditor pihak eksternal dari badan sertifikasi yang ditunjuk oleh pihak kedua jika diperlukan" – Transporter are willing to comply with certification system of RSPO Supply Chain during transport material and willing to be audit by internal auditor company (PT IIS – Buatan I POM) and external auditor from Certification Body if necessary. |
|---|
| PT IIS Buatan II POM has a procedure to control the outsourced transporter through "SOP Traceability AA-MPM-OP-1400.17-R7 dated 1 October 2019" |
| Internal control for CPO and PK delivery by contractor has made as well with: |
| ✓ Surat Izin Muat CPO dan Kernel, contain information of Driver name, Identity number, Car/Truck Number, CPO/PK Dispatch time, netto, incoming and outgoing time. |
| Delivery Order Slip from Transporter, contain information of sales contract number, Truck number, destination, driver name, port destination. |
| ✓ Daftar Periksa Kesiapan Pengiriman CPO/Kernel contain information of Truck number, driver name, date of inspection, item inspection including: driver identity and completeness of vehicle legality, completeness of physical standard of vehicle, number of seal. |
| During onsite audit confirmed that control for CPO and PK delivery has well implemented by Buatan II Palm Oil Mill. Interview with CPO and PK transporter from CV Jasa Sahabat Abadi indicated that they have aware and controled by PT Inti Indosawit Subur – Buatan II POM. |
| Interview with transporter CV Jasa Sahabat Abadi, it was confirmed that the transporter are aware regarding the requirement of RSPO supply chain during transport. Handling during transport are well control, before loading – during transport – unloading was monitor by |

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| | | supervisor. Tank transport are cleaning before loading and after unloading. GPS are installed in each tank truck to monitor during transport until reach the destination. | |
|--------|--|---|----------|
| 3.8.10 | The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products. | The mill has recorded the name and contact detail of all contractors, as record in contract agreement. During audit contract agreement are verified. During transport, the mill has legal ownership of the product delivered. | 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. | The site committed to inform CB related name and contact details of any new contractors as mentioned in Procedure "SOP Traceability AA-MPM-OP-1400.17-R7 dated 1 October 2019". PT IIS – Buatan II POM informed the CB prior the audit through pre information audit checklist. During this audit AS2.3 there is no new contractors. | Complied |
| 3.8.12 | Record keeping i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements. ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock. iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis. iv) For Mass Balance Module, the mill: | The organization has maintained accurate, complete, up-to-date and accessible records and reports covering all aspects of RSPO Supply Chain requirements, as evident in: Laporan Harian Pabrik (Mill Daily Report); dated 31/12/2023 and 30/06/2024 FFB delivery note Weigbridge ticket for FFB receiving, CPO and PK delivery Delivery Order Sales contract Shipping Announcement Mass balance report period 2023/2024: January – March 2023, April – June 2023, July – September 2023, October – December 2023, January – March 2024, April – June 2024. | Complied |

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| | a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis. b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock). | Internal audit RSPO SCCS and Management review The procedure of Traceability (AA-MPM-OP-1400.7.R7), requires that all records and reports related to traceability and book keeping are retained for a period of 10 years. Buatan II POM uses Mass Balance Module for supply chain. Buatan I POM has record and balances all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK in a three-monthly basis, as shown in Book Keeping 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 Book Keeping Mass Balance Report as evidence in "Mass Balance Report Buatan I POM" period 2023/2024: January – March 2023, April – June 2023, July – September 2023, October – December 2023, January – March 2024, April – June 2024. All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios/actual production of CPO and PK. According to Mass balance Report, Buatan II POM only deliver Mass Balance sales from a positive stock. | |
|--------|--|--|----------|
| 3.8.13 | Extraction Rate The oil extraction rate (OER) and the kernel extraction rate(KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently. | The organization is able to provided estimate volume of CPO and PK in a year period as in Budget FY 2023/2024 Production FFB, CPO and PK. The organization also keep an up to date record of the FFB volume received, CPO and PK produced over a period of twelve (12) month, as in Rekapitulasi Produksi TBS, CPO dan PK PT Inti Indosawit Subur – Buatan II POM. OER and KER are estimated based on associated inputs and upon past experience (previous year FFB, CPO and PK production). The site has set OER for budget 2024 as 20.14% and KER as 4.60%. Budget FFB process 2024: certified 209,296.78 MT | Complied |

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| | Ι | | |
|--------|--|--|------------|
| | | Budget CPO production 2024: certified 4,803.87 MT | |
| | | Budget PK production 2024: certified 1,455.07 MT | |
| | | Actual production volume Buatan II POM (July 2023 – June 2024) | |
| | | FFB: 158,077.64 MT (Simpang Perak Estate + Scheme smallholders Buatan II) and 48,312.26 MT (from Buatan Estate-supply bases Buatan I POM), so FFB total 206,389.90 MT. | |
| | | CPO: 32,951.67 MT (from Simpang Perak Estate + Scheme smallholders Buatan II), 10,042.03 MT (from Buatan Estate-supply bases Buatan I POM), so the total is 42,993.70 MT (OER 20.83%). | |
| | | PK: 7,246.09 MT (Simpang Perak Estate + Scheme smallholders Buatan II), 2,216.24 MT (from Buatan Estate-supply bases Buatan I POM), so the total is 9,462.33MT (KER 4.58%). | |
| 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. | Complied |
| | | Based on daily report "Laporan Harian Pabrik" dated 30 June 2024, actual OER and KER average ytd 30 June 2024 are as follows: OER = 20.50% and KER = 4.35% | |
| | | Average OER since July 2023 – June 2024 was 20.83 % and KER was 4.58% as stated in the Table 10 Section 1. | |
| 3.8.15 | Processing | Buatan II POM implement Mass Balance Module. | Not |
| | 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. | This indicator is not applicable. | Applicable |
| 3.8.16 | Registration of Transactionsi) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to | PT. Inti Indosawit Subur – Buatan II POM has made shipping announcement inside PalmTrace transaction, sample seen for period July 2023 – June 2024: | Complied |

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| 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. | Transaction ID | Buyer | Product | Supply Chain Model | Volume | Status |
|---|----------------------|--|-----------|--------------------------|------------|------------|
| ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be | TR-55c3dbcf- 69e7 | PT IIS - Buatan I KCP | CSPK | MB | 1444.54 | Confirmed |
| removed in the RSPO IT platform. | TR-ca08c2ff- ff92 | PT IIS - Buatan I KCP | CSPK | MB | 3020.92 | Confirmed |
| | TR-b1d7658d- 90d1 | PT Sari Dumai Oleo | CSPO | MB | 42.75 | Confirmed |
| | TR-74108f38- 1797 | PT Sari Dumai Oleo | CSPO | MB | 104.95 | Confirmed |
| | TR-319f70f2- 7511 | PT Sari Dumai Oleo | CSPO | MB | 524.37 | Confirmed |
| | TR-6f2b5c3a- b65d | PT IIS - Buatan I KCP | CSPK | MB | 667.53 | Confirmed |
| | TR-7879b249- 7858 | PT IIS - Buatan I KCP | CSPK | MB | 1842.21 | Confirmed |
| | TR-4731fd3e- 4532 | PT Sari Dumai Oleo | CSPO | MB | 81.39 | Confirmed |
| | TR-67590ca1- 3712 | PT. Sari Dumai Sejati | CSPO | MB | 3053.76 | Confirmed |
| | TR-609b8e5e- f81e | PT. Sari Dumai Sejati | CSPO | MB | 750 | Confirmed |
| | TR-3ff3bfb1- 4c44 | PT. Sari Dumai Sejati | CSPO | MB | 750 | Confirmed |
| | TR-9ef3b263- e9ba | PT. Sari Dumai Sejati | CSPO | MB | 8.12 | Confirmed |
| | certified CSPC | awit Subur – from their F SPO; Stock rer | PalmTrace | account | with volur | ne remove: |

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| | | evidence of remove transaction can be demonstrated on the palmtrace transaction with transaction ID: ST-TR-724f1b2-bc82. | |
|--------|--|--|----------|
| 3.8.17 | Claims The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims. | The procedure for claims is stated in SOP for Traceability (AA-MPM-OP- 1400.17-R7) dated 1 October 2019. The mill only makes claims on RSPO Certified product in compliance with RSPO Rules on Market Communications and Claims. Statement of RSPO certified and Mass Balance model are only stated in sales documents of RSPO certified product. PT. Inti Indosawit Subur – Buatan II POM has not made claims regarding the support of RSPO certified oil palm products. However the | Complied |
| | | organization aware about the RSPO Rules on Market Communications and Claims. | |
| Genera | corporate communications | | |
| 4.1 | A corporate communication is one made by any RSPO member that highlights its RSPO membership and/or its commitment to the objectives and principles of RSPO. Corporate communication is a "non-product related" claim. | PT. Inti Indosawit Subur (with the brand Asian Agri), the parent company of Buatan II POM is highlighting its commitment to the principles of RSPO, and directly referring to RSPO website. The corporate communication can be found at <u>http://www.asianagri.com</u> . | Complied |
| 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 | Corporate communication in Asian Agri website: 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. In 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 | Complied |

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| 4.3 | Members are not allowed to use the RSPO corporate logo as shown | production. We received our 1st RSPO certification for our estate in 2010, and in 2012, the certification for our scheme smallholder". State the member's history with regards to the RSPO: In the website of Asian Agri, it was stated the company is RSPO Member since February 2006. Use of RSPO Trademark to promote its membership of the RSPO: in the website, the company display RSPO Trademarks with valid trademark licence number 1-0022-06-100-00. Asian Agri website did not display the RSPO Corporate Logo. | Complied |
|-----|--|--|----------|
| 4.4 | below. This is for the sole use of the RSPO Secretariat.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. | In the Asian Agri website, stated that the company is RSPO Member since February 2006. However, it is clear that the statement did not lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products. | Complied |
| 4.5 | 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: "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 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." | In the Asian Agri website, stated that the company is RSPO Member since February 2006. However, it is clear that the statement did not lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products. | Complied |

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| 4.6 | RSPO non-certified members are allowed to make product-related claims in their corporate communication tools by doing the following: 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. B. Claim statements are limited to the following examples: i. "The rate of RSPO-certified palm oil procurement was (X%). We aim to achieve (X%) sustainable procurement by fiscal year (YEAR)." ii. 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. 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". | | Not Applicable |
| Produc | t-specific communications | | |
| 5.1 Ger | leral | | |
| 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 Inti Indosawit Subur – Buatan II 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 Inti Indosawit Subur – Buatan II POM stated the supply chain model and certificate number, e.g. in sales contract, DO and weighbridge ticket/delivery note. | Complied |



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| 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 Inti Indosawit Subur – Buatan II 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 Inti Indosawit Subur – Buatan II 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 | 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 • 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. • 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. | PT Inti Indosawit Subur – Buatan II POM is a palm oil mill; thus, this indicator is not applicable. | Not Applicable |
| 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 | PT Inti Indosawit Subur – Buatan II POM is a palm oil mill; thus, this indicator is not applicable. | Not Applicable |

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| | this document and that the claim itself can be supported through a certified supply chain | | |
|-----------|---|---|-------------------|
| 5.2 Off p | 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 Inti Indosawit Subur – Buatan II POM did not use RSPO trademark or logo in the product specific communication. PT Inti Indosawit Subur – Buatan II 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 |
| 5.2.2 | 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 Inti Indosawit Subur – Buatan II 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: 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. | PT Inti Indosawit Subur – Buatan II POM is a palm oil mill; thus, this indicator is not applicable. | Not Applicable |

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|-------|--|---|----------|
| 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 Inti Indosawit Subur – Buatan II POM sold its oil palm product in bulk, there was no on-pack claim used. | Complied |
| 5.3.2 | 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: | PT Inti Indosawit Subur – Buatan II POM sold its oil palm product in bulk, there was no on-pack claim used. | Complied |
| | A) For Identity Preserved (IP)/ Segregated (SG) Certified Products: | | |
| | RSPO IP/SG CERTIFIED* Contains RSPO IP/SG palm oil* Contains RSPO certified palm oil (IP/SG)* | | |
| | *Add RSPO TM Licence Number below or next to the claim. | | |
| | B) or Mass Balance (MB) Certified Products: RSPO MIXED* Contributes to the production of RSPO certified palm oil* Contains RSPO certified palm oil (MB)* | PT Inti Indosawit Subur – Buatan II POM sold its oil palm product in bulk, there was no on-pack claim used. | Complied |
| | *Add RSPO TM Licence Number below or next to the claim. | | |
| | C) For Partially Certified Products: RSPO 50% MIXED* Contains at least 50% RSPO certified palm oil* | PT Inti Indosawit Subur – Buatan II POM sold its oil palm product in bulk, there was no on-pack claim used. | Complied |
| | *Add RSPO TM Licence Number below or next to the claim. | | |
| | D) For Products covered with Book and Claim (B&C): RSPO CREDITS* Supports the production of RSPO certified palm oil* Contains palm oil covered by the purchase of RSPO Credits* | PT Inti Indosawit Subur – Buatan II POM sold its oil palm product in bulk, there was no on-pack claim used. | Complied |

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| | *Add RSPO TM Licence Number below or next to the claim. | | | |
|---------|--|--|----------|--|
| 5.3.3 | On pack claims shall not include information about the claimant's RSPO membership status. | PT Inti Indosawit Subur – Buatan II 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 Inti Indosawit Subur – Buatan II 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 Inti Indosawit Subur – Buatan II POM sold its oil palm product in bulk, up to this moment, PT Inti Indosawit Subur has not use RSPO label or trademark. | 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 Inti Indosawit Subur – Buatan II POM sold its oil palm product in bulk, up to this moment, PT Inti Indosawit Subur has not use RSPO label or trademark. | Complied | |
| MODUL | E B – MASS BALANCE SPECIFIC RULES | | | |
| Mass Ba | alance palm oil content | | | |
| | 95% of the palm oil content must be RSPO MB-certified. | PT Inti Indosawit Subur – Buatan II POM is producing and selling CPO and PK; All certified product sold are 100 % content oil palm RSPO MB- certified. No such cases as the certified material is bulk intermediate product. By default, the material is either 100% claimed under RSPO or not RSPO. | 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 no percentage of non-certified oil palm within the certified product. All certified product produced and sold are 100% MB. PT Inti Indosawit Subur – Buatan II POM was not produce end consumer goods. The production are CPO and PK. | Complied | |
| Messagi | Messaging | | | |

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| | Messaging ALLOWED in storytelling in product-specific communications includes: [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 Inti Indosawit Subur – Buatan II POM was not use storytelling in product-related communications. | Complied |
|----------|---|--|----------|
| Produc | t-Specific Communications Labelling | | |
| | Members are allowed to use the RSPO Label in one of the following ways: 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". | No product related communications are found. Information provided in Cooperate website includes the total certified units, traceability of the supply chain and commitment to have all units certified. | Complied |
| - | le 4: Respect community and human rights and deliver benefit | | |
| | community rights, provide equal opportunities, maximise benefits from engage | - | |
| Criteria | 4.1: The unit of certification respects human rights, which includes respective | ng the rights of Human Rights Defenders. | |
| 4.1.1 | (C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, supply chain and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces. Critical (Major) compliance - | The certification unit has a commitment to respecting human rights and describe in corporate policy set on 14 July 2020 by Group Manager (GM) PT Inti Indosawit Subur –Buatan Group according to the Memorandum from GM No. 01/GM-Buatan/MEMO/VII/2020 dated 14 July 2020, related " <i>The policy prohibits any acts of revenge, intimidation and harassment for whistle-blowers / human rights defenders</i> " (Human Right Defender). | Complied |

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| The policy relating to human rights, is explained in point 13, stating that: "The company respects human rights by treating all employees fairly, both in terms of acceptance, valuation, conditions and working environment, as well as representation regardless of tribe, caste, national origin, religion/belief, disability, gender, sexual orientation, membership of trade union political affiliation and/or age". | |
|---|--|
| As for the Buatan Plasma, the human rights policy is contained in every KUD, for example the Bhirawa Bakti KUD which was established on 6 September 2022 which contains commitments: | |
| 1) Compliance with regulation and law | |
| Ethical behavior in business (prohibition of all forms of corruption, bribery, fraud in the use of funds and resources) | |
| 3) Environmental pollution | |
| 4) Occupational Health and Safety | |
| 5) Prohibition of the practice of burning land, peat areas and forest areas | |
| 6) Respect defenders without giving threats or intimidation | |
| 7) Respect human rights defenders without making threats or intimidation prevents sexual harassment | |
| Respect human rights by treating employees and peasants fairly and does not differentiate between ethnicity, caste, religion, and gender. | |
| 9) Prohibition of employing children under the age of 18 in every plantation operational activity. | |
| This is evidenced by statements from plantation workers (harvesters, fertilizers, sprayers, and maintenance), factories (mill operators and warehouse workers) as well as contractors who state that so far there | |

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| 4.1.2 | The unit of certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations. - Minor compliance - | have been no incidents or issues of human rights violations occurring in the operational area of the certification unit. During the past year (period 2023/2024), the certification unit did not have records related to the use of violence / mercenaries or paramilitaries in resolving conflicts / problems that existed between the certification unit and related stakeholders (surrounding communities, workers, or others). Based on extracting information related to issues on social media and the internet, the auditors did not find any information of violence or abuse perpetrated by the company. | Complied |
|------------|--|---|------------|
| | | information of violence or abuse perpetrated by the company. The results of interviews with the surrounding community (Bukit Agung Village), related agency and company workers revealed that up to now if there was a conflict / problem with the company, the resolution action taken was deliberation without resorting to violence. Resolution of conflicts / problems using these deliberations has been quite effective and during the past year there have never been any conflicts / problems with the company. | |
| Criteria 4 | 4.2: There is a mutually agreed and documented system for dealing with co | mplaints and grievances, which is implemented and accepted by all affecte | d parties. |
| 4.2.1 | (C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD. - Critical (Major) compliance - | There are no changes related to the procedure for handling complaints like external parties, namely: " <i>Mekanisme Penanganan Keluhan</i> " – complaint handling mechanism (Doc. No. SOP AA-GL-5005-RO-01) while complaint from internal regulated under " <i>Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan</i> " – Employee' complaint and resolution mechanism (Doc. No. SOP-AA-HR-3008-RO 05) and responded not more than 14 days. This procedure has also ensured the anonymity of complainants, defenders of human rights or whistleblowers and without any risk of retaliation or intimidation against whistleblowers. | Complied |

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| | | In point 4.2.2, the COD menuately an tarkait densary population second | |
|-------|---|--|----------|
| | | In point 4.2.2, the SOP menyatakan terkait dengan penyampaian secara anonimitas akan dijaga kerahasiannya. These mechanisms have communicated to external parties and disseminated to PT IIS employees. Based on interview with local communities, Gender committee leader and worker union leader; they understood the procedure and mechanism to communicating complaint and/or grievance to company. Corporate policy has been socialized/dissemination to all levels of PT IIS – Buatan Group employees on 9 February 2024 (list of participants can be shown) and on stakeholders (including local contractors) on 19 April 2024 which was attended by 28 stakeholders. | |
| | | Scheme smallholders: | |
| | | The scheme smallholders have a mechanism of consultation and communication and there is no changes in the form of " <i>Mekanisme Komunikasi, Konsultasi dan Keluhan</i> ", dated 13 January 2011. | |
| | | The procedure has been communicated to all members on 12 February 2024 and also recorded into the "Buku Pintar" for each of farmer. | |
| | | This procedure has also communicated again to all members of each cooperative (KUD Birawa bakti, KUD Tani Rukun, KUD Mitra Usaha, KUD Makarti Sawit) in February 2024 which was presented during the meeting for RAT discussions. | |
| 4.2.2 | Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties. - Minor compliance - | There are no changes related to the procedure for handling complaints like external parties, namely: " <i>Mekanisme Penanganan Keluhan</i> " – complaint handling mechanism (Doc. No. SOP AA-GL-5005-RO-01) while complaint from internal regulated under " <i>Mekanisme Penyampaian</i> <i>Keluhan dan Penyelesaian Keluhan Karyawan</i> " – Employee' complaint and resolution mechanism (Doc. No. SOP-AA-HR-3008-RO 05) and responded not more than 14 days. This procedure has also ensured the anonymity of complainants, defenders of human rights or | Complied |

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| | | whistleblowers and without any risk of retaliation or intimidation against whistleblowers. | |
|-------|---|--|----------|
| | | In point 4.2.2, the SOP menyatakan terkait dengan penyampaian secara anonimitas akan dijaga kerahasiannya. These mechanisms have communicated to external parties and disseminated to PT IIS employees. Based on interview with local communities, Gender committee leader and worker union leader; they understood the procedure and mechanism to communicating complaint and/or | |
| | | grievance to company. Corporate policy has been socialized/dissemination to all levels of PT IIS – Buatan Group employees on 9 February 2024 (list of participants can be shown) and on stakeholders (including local contractors) on 19 April 2024 which was attended by 28 stakeholders. | |
| | | Scheme smallholders: | |
| | | The scheme smallholders have a mechanism of consultation and communication and there is no changes in the form of " <i>Mekanisme Komunikasi, Konsultasi dan Keluhan</i> ", dated 13 January 2011. | |
| | | The procedure has been communicated to all members on 12 February 2024 and also recorded into the "Buku Pintar" for each of farmer. | |
| | | This procedure has also communicated again to all members of each cooperative (KUD Birawa bakti, KUD Tani Rukun, KUD Mitra Usaha, KUD Makarti Sawit) in February 2024 which was presented during the meeting for RAT discussions. | |
| 4.2.3 | The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders. - Minor compliance - | Regarding the complaint mechanism, there is no change from the previous audit period, namely the new procedure, namely the SOP for Submitting and Resolving Employee Complaints (SOP No: AA-HR-308.5-R1 effective December 1 2019). This procedure also protects the | Complied |

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| anonymity of the reporter. Refer to the Asian Agri website <u>https://www.asianagri.com/id/panel-keberbesaran/keluhan-pengaduan</u> | |
|---|--|
| Asian Agri is committed to responding quickly and constructively to any complaints made against our operations or our suppliers, and reporting them publicly. We developed a robust complaints procedure to resolve all verifiable complaints and conflicts with all relevant stakeholders such as land conflicts, social conflicts, human rights issues, labor issues, etc. | |
| Internal: | |
| There are log books located in all estates and mills managed by Asian Agri's business units. Employees are free to file concerns and reports in these log books, on matters related to Asian Agri's sustainability policy. Concerns on operation disruptions faced by employees may be documented in the Disruption Log Book. Issues pertaining to employee rights may be documented in the Complaint Log Book. Confidential reports may be submitted through email or telephone to protect the identity of the reporter; channel used: Poster on Whistleblowing is placed in every office of Asian Agri, Telephone: +62 811 910 7916, Email: attention@asianagri.com. | |
| External: | |
| Stakeholders of Asian Agri including but not limited to Government, | |
| smallholders, suppliers, vendors, academicians, NGOs, media, etc), are provided different channels to report their concerns/findings. | |
| Reporters may share their concerns and information on business misconduct, corruption, harassment, criminal acts, environment, etc.; channel used: Email: <u>grievance@asianagri.com</u> . Address: Jl. MH Thamrin No. 31, Jakarta 10230, Indonesia. | |
| | |

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| This procedure is also applied to scheme smallholder operational. The procedure provides guidelines on handling grievances related to sustainability practices across our supply chain as well governance matters in our operations. The following grievance channels are available to support business transparency: The last socialization of SOP namely SOP <i>Penyampaian dan Penyelesaian</i> |
|---|
| <i>Keluhan Karyawan</i> (SOP No: AA-HR-308.5-R1 effective dated 1 December 2019) was performed on 15-16 April 2024 and attended by 130 participants. |
| Based on a review of documents listing complaints in plantations and factories for 2023 - 2024, in general workers' complaints are related to damage to housing facilities that need to be repaired. The organization has responded to worker complaints according to procedures and the complaints no longer exist. For external complaints, based on a review of the external complaint logbook, for 2023 and 2024 there will be no complaints to the organization. |
| Scheme smallholders: |
| Since 2011, the consultation and communication mechanism in the "Communication, Consultation and Complaints Mechanism", dated January 3 2011 has not changed. This procedure was communicated to all members in November 2019 and was also recorded in the " <i>Buku Pintar</i> " for each farmer. |
| In this surveillance audit, based on the results of interviews with several farmers in the field, there were no complaints from member farmers. |
| The most important issue is the replanting process, especially for farmers in 2 Regencys, i.e. Palalawan Regency and Siak Regency, where the cooperative is in Pelalawan Regency while the farmers' land is in Siak Regency. However, the Plasma Management of PT IIS Buatan Group has sent a letter requesting Replanting with the PSR Program |
| |

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| | | (Program Peremajaan Sawit - BPDPKS) to each Regency including the documents required. Until this audit was carried out there was still no response. | |
|-------|--|--|----------|
| 4.2.4 | The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator. - Minor compliance - | response. Based on the ASA 2.3 audit results, there are no changes related to the conflict resolution mechanism, the documents are still the same as the previous audit results. Company has established a mechanism to handle complaint from external party, "<i>Mekanisme Penanganan Keluhan</i>" – complaint handling mechanism (Doc. No.SOP AA-GL- 5005-RO 01). These mechanisms have been communicated to external parties. In the event of a complaint that leads to a conflict with stakeholders, the company has also established Procedures related to Conflict Handling SOP No. AA-GL-5003.1-R1 dated August 22, 2011, explains that: Public Relations (<i>Humas: Hubungan Masyarakat</i>) receive conflict information (individuals, issues with surrounding communities, other representative institutions, media or newspapers), the company will analyses and mapping the problem through internal discussions (Estate manager, Managing Director, Regional Head and Stakeholder Relations), then companies through public relation will provide opportunities access to relevant interested parties (Local Government, Legal Apparatus or | Complied |
| | | legal advisor) to obtain legal protection or independent technical assessments (Relevant agencies, for example: Plantation Service, National Land Agency-BPN). In this conflict resolution process, it is carried out through the FPIC process (making an agreement together with the conflicting party and or the institution) that represents it and if this does not meet an agreement, then litigation will be carried out or settlement through legal channels. Based on the results of consultations with external and internal stakeholders, company management, and the results of evaluating the | |

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| | | grievance log book document, there are no grievances/complaints related to land tenure. | |
|----------|---|---|----------|
| Criteria | 4.3: The unit of certification contributes to local sustainable development as | agreed by local communities. | |
| 4.3.1 | Contributions to community development that are based on the results of consultation with local community are demonstrated Minor compliance - | | Complied |
| | | Realization of CSR for year 2023 is 90%. | |

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| CSR Program for 2024 period as follows: 1. Social, including: Blood donors Flood relief Cheap market 2. Livestock, including: Alternative economic program 3. Plantation, including: Plasma farmer development Independent farmer development 4. Facilities and infrastructure, including: Road repair assistance Information board material assistance for Puskesmas Pelalawan |
|--|
| Material assistance for HKBP Mekar Jaya Church. The realization of the CSR program until June 2024 is as follows: Assistance for flood victims in Pangkalan Kerinci District, Pelalawan Regency, Blood Donation and cheap market for cooking oil and rice Assistance for educational activities Assistance in the economic sector: assistance of 210 durian musangking seedlings in Bukit Agung Village and fish and gourami seedlings in Makmur Village Assistance in the health sector, namely a coordination meeting with the Pelalawan Regency TPPS for stunting prevention |

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| | | Assistance for worship facilities, AC and fans at the Lalang Kabung village mosque, assistance for trash bins in Lubuk Ogung Village and assistance for information boards for the Pelalawan District Health Center-<i>Puskesmas</i>. Based on an interview with the Head of Bukit Harapan Village, the annual CSR planning at The Buatan Group always involves representatives of villages around the plantation through village development initiatives. | |
|-------|--|---|----------|
| | 4.4: Use of the land for oil palm does not diminish the legal, customary or u | | |
| 4.4.1 | (C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed (FPIC) process. Documents related to the history of land tenure and the actual legal or customary use of the land are available. - Critical (Major) compliance - | PT. Inti Indosawit Subur – Simpang Perak Estate and POM has obtained the legal ownership in the form of HGU, as follow: 1. "Surat Keputusan Hak Guna Usaha" (Land Title), approved by "Menteri Negara Agraria/Kepala BPN No.10/HGU/1993 tentang Pemberian HGU atas nama PT. IIS, atas tanah di Kabupaten Kampar seluas 5,781.47 Ha", dated 13th May 1993. HGU Simpang Perak Estate is include Buatan Estate (under PT Inti Indosawit Subur). 2. HGU (Land titles) No.01, 1993, dated 19th June 1993 (5,781 Ha). HGU valid until 31 December 2023. 3. PT IIS Simpang Perak Estate (include Buatan Estate) has propose the renewal HGU with process as below: Application letter PT IIS Buatan Estate "Permohonan Perpanjangan/Pembaharuan HGU Nomor: 009/GL-AAS/EXT/10/23 dated 27 October 2023". Field review by land inspection committee B "Kementrian Agraria dan Tata Ruang/Badan Pertanahan Nasional Kantor Wilayah Badan Pertanahan Provinsi Riau" conducted on 20 March 2024 according to Letter No: HP.01.03/859-14/III/2024 | Complied |

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| dated 18 March 2024 for land parcell 1,287.4027 ha located at Siak Regency. | |
|--|--|
| - Field review by land inspection committee B "Kementrian Agraria dan Tata Ruang/Badan Pertanahan Nasional Kantor Wilayah Badan Pertanahan Provinsi Riau" conducted on 4 January 2024 according to Letter No: HP.01.03/10-14/I/2024 dated 2 January 2024 for land parcell 4,402.6689 ha located at Siak Regency. | |
| - Risalah Panitia Pemeriksaan Tanah B Nomor 9/2024, dated 28/03/2024 | |
| According to field review committee B "Kementrian Agraria dan Tata Ruang/Badan Pertanahan Nasional Kantor Wilayah Badan Pertanahan Provinsi Riau" total area propose for new HGU was 5,690.072 ha from previous HGU 5,781.47 Ha. Area 91.40 ha was excluded from HGU due to another use of area and enclave area not manage by company. | |
| There is no land acquisition since Buatan Estate and POM established. | |
| PT Inti Indosawit Subur – Simpang Perak Estate has planted since 1988 – 1991 while Buatan Plasma has planted since 1988 - 1993. Currently, replanting activities are still in progress. Replanting has been started since 2014 – 2024. | |
| Company also has prepared a mechanism to identify and calculate fair compensation or loss of legal or costumary rights to land set out in the standard operating procedure (SOP) "Prosedur Penyelesaian Sengketa Lahan No. AA-GL-5003-1-R2", dated 8 th May 2015. The mechanism has taken into account FPIC Guide for RSPO Member 2015, whereby the procedure regulated information convey, negotiation, participative boundary measurement, involvement of other party and neighboring parties – in the boundary of the conflicted area (if any). | |
| | |

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| Scheme Smal | Ilholders: | | | |
|-----------------------------------|--|--------------------------------|---------------------------|--------------|
| since 1988 - 19 | nolder of PT Inti Ind 993. Currently, repl s been started sinc | lanting activities | s are still i | in progress |
| program name TRANS). All are | p status of Scheme S ely Transmigration ea of scheme smallh Milik – Land owners | Program since older has land t | 1992 – 1 itle in the f | .995 (PIR |
| Sample of land audit, among of | d title of Smallhold others: | er samples has | been ver | ified during |
| 1 | Name | KUD | SHM No. | Area (ha) |
| Wagimin | | Tani Rukun | 76 | 2 |
| Karsiman | | Tani Rukun | 82 | 2 |
| Supirman | | Tani Rukun | 197 | 2 |
| Karmuji | | Tani Rukun | 200 | 2 |
| Basyarudin | | Tani Rukun | 722 | 2 |
| Anda Juanda | | Bhirawa Bhakti | 190 | 2 |
| Chamsidik | | Bhirawa Bhakti | 182 | 2 |
| Kudsi Bin Dulkarir | im | Bhirawa Bhakti | 209 | 2 |
| Madsalim | | Bhirawa Bhakti | 199 | 2 |
| Sarna Bin Pulang | J | Bhirawa Bhakti | 193 | 2 |
| 11 | | Makarti Sawit | 406 | 2 |
| Ngatemin | | Makarti Sawit | 486 | 2 |
| Ngatemin Sahroni | | | | |
| | | Makarti Sawit | 7812 | 2 |

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| r | | | | | | 1 |
|-------|--|--|--|--------------------------------------|--|----------|
| | | Abas | Makarti Sawit | 464 | 2 | |
| | | Samsuri | Mitra Usaha | 1263 | 2 | |
| | | Dedi | Mitra Usaha | 1220 | 2 | |
| | | Misrin | Mitra Usaha | 1236 | 2 | |
| | | Suradin | Mitra Usaha | 1240 | 2 | |
| | | Based on interview at KUD Tar Makarti Sawit and KUD Mitra L (farmer) and relevant authority, P there was no case of land conflict conflict with other party related to | Jsaha, sampled lantation Agency : between smallh | smallhold of Pelalav older mei | ler member wan District; mber and/or | |
| | | Cooperatives have a conflicts re Penanganan Konflik" dated 1 st Au flow process to resolution on land village government and all related | gust 2014. The r conflict, with invo | nechanisr | m explaining | |
| 4.4.2 | Copies documents evidencing agreement- making processes and negotiated agreements detailing the FPIC process are available and | There is no land acquisition since including scheme smallholders an | | | atan Group) | Complied |
| | Minor compliance - 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 | PT Inti Indosawit Subur – Simpa planted since 1988 – 1991 while planted since 1988 - 1993. Curr progress. Replanting has been sta | e Scheme smallh ently, replanting | olders Bu activities | uatan II has | |
| | | It was noted no customary land of areas and in scheme smallholder p dispute between the company operational areas. | plantation. In add | lition, the | re is no land | |
| | 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; | The unit of certification has been 1980's. Previously the rights own so currently, there is no new land | ed were in the f | orm of H | GU on 1993 | |

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| | 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. | obtained from interviews with representatives of Lalang Kabung Village and scheme smallholder sampled member, it is known that so far there have been no issues regarding land conflicts. | |
|-------|---|---|----------|
| | | Until the surveillance assessment ASA2.3 is carried out, there is no additional or expansion operational area for estate and scheme smallholders | |
| | | Based on documents review and interview with local government and local communities surrounding the company, there is no change from the previous audit that it was noted no customary land or other legal rights within the company areas and in scheme smallholder plantation. In addition, there is no land dispute between the company and communities surrounding their operational areas. | |
| 4.4.3 | (C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Critical (Major) compliance - | The Company and scheme smallholders have Land Title - "Hak Guna Usaha (HGU)/" and Land Certificate – "Sertifikat Hak Milik (SHM)" Land title for smallholders. There is no customary land or legal rights within the company and scheme smallholdres area as the land originally was allocated as part of transmigration program. Based on the document review, interviews with community | Complied |
| | | representatives from Lalang Kabung Village and smallholder sampled member, it was found that until the surveillance assessment activity there were no issues regarding land disputes and no development of new areas. The unit of certification already has legal rights in the form of HGU and SHM (for Scheme Smallholder) published in Indonesian. The history of land acquisition dates back on period 1980's so the FPIC process has been cleared. | |
| | | It was noted that all oil palm developments in PT IIS Buatan Group go through a comprehensive process, including in particular, full respect for their legal and customary rights to territories, lands and resources through the local community's own representative institutions. All relevant information and documents are available, and communities | |

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| | | have the option of accessing resources for independent third party advice through a documented, long-term and two-way process of consultation and negotiation. | |
|-------|--|---|----------|
| 4.4.4 | All relevant information is available in appropriate forms and languages, including assessment of impact, proposed benefit sharing, and legal arrangements. - Minor compliance - | Based on documents review and interview with local government and local communities surrounding the company, it was noted that no customary land or other legal rights within the company areas and in scheme smallholder plantation. | Complied |
| 4.4.5 | (C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose. - Critical (Major) compliance - | Based on the document review, interviews with community representatives from Bukit Harapan Village and scheme smallholder sampled member, it was found that until the surveillance assessment activity there were no issues regarding land disputes and no development of new areas. The unit of certification already has legal rights in the form of HGU and SHM (for Scheme Smallholder). The history of land acquisition dates back on period 1980's so the FPIC process has been cleared. | Complied |
| | | It was noted that all oil palm developments in PT IIS Buatan Group including schemes smallholders go through a comprehensive process, including in particular, full respect for their legal and customary rights to territories, lands and resources through the local community's own representative institutions. All relevant information and documents are available, and communities have the option of accessing resources for independent third party advice through a documented, long-term and two-way process of consultation and negotiation. | |
| 4.4.6 | There is evidence that implementation of agreement negotiated through FPIC is annually reviewed in consultation with affected parties. - Minor compliance - | Based on the document review, interviews with community representatives from Lalang Kabung Village and scheme smallholder sampled member, it was found that until the surveillance assessment activity there were no issues regarding land disputes and no development of new areas. The unit of certification already has legal rights in the form of HGU and SHM (for Scheme Smallholder). The | Complied |

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| | | history of land acquisition dates back on period 1980's so the FPIC process has been cleared. It was noted that all oil palm developments in PT IIS Buatan Group including schemes smallholders go through a comprehensive process, including in particular, full respect for their legal and customary rights to territories, lands and resources through the local community's own representative institutions. All relevant information and documents are available, and communities have the option of accessing resources for independent third party advice through a documented, long-term and two-way process of consultation and negotiation. | |
|-------|--|---|------------------|
| | 1.5: No new plantings are established on local peoples' land where it can be through a documented system that enables these and other stakeholders to | | ir FPIC. This is |
| 4.5.1 | (C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available. - Critical (Major) compliance - | Unit of Certification is long-established plantation with planting year since 1988. The history of land acquisition dates back on period 1980's so the FPIC process has been cleared. Previously the rights owned were in the form of HGU on 1993 so currently, there is no new land compensation process. | Complied |
| | | The Company and scheme smallholders has "Hak Guna Usaha (HGU)/"Sertifikat Hak Milik (SHM)" Land title for smallholders. There is no customary land or legal rights within the company and scheme smallholdres area as the land originally was allocated as part of transmigration program. | |
| | | The scheme smallholder area of PT. Inti Indosawit Subur – Simpang Perak (Buatan group) is including in government program for "Perkebunan Inti Rakyat – Transmigrasi/PIR-Trans", refer to the Decree of Menteri Transmigrasi No. Kep.90/MEN/1990 related "Izin Pelaksanaan Transmigrasi PIR-Trans kepada PT. Inti Indosawit Subur I dengan Komoditas Kelapa Sawit di Lokasi Pangkalan Kuras, Kabupaten Kampar | |

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| dan Pasir Penyu, Kabupaten Indragiri Hulu, Provinsi Riau" dated 29 th July 1991. | |
|---|--|
| From this background, it was understood the scheme smallholder obtained the land ownership through government program PIR-Trans. Therefore it was not gone through compensation process to previous traditional landowners because the land was state land, free from ownership right. | |
| Based on documents review and interview with local government and local communities in surrounding of the company, it was noted there was no area/land that is under dispute within HGU/SHM area. | |
| There is no new planting within certified area of PT Inti Indosawit Subur – Simpang Perak Estate and Scheme Smallholder after November 2005. Currently, replanting activities are still in progress. All of the immature area was for replanting, for oil palm with planting year 1988, 1989, 1990 and 1991. | |
| Currently land title HGU Buatan Estate is on process of renewal, latest progress of renewal process: | |
| - Application letter PT IIS Buatan Group "Permohonan Perpanjangan/Pembaharuan HGU Nomor: 009/GL- AAS/EXT/10/23 dated 27 October 2023". | |
| Field review by land inspection committee B "Kementrian Agraria dan Tata Ruang/Badan Pertanahan Nasional Kantor Wilayah Badan Pertanahan Provinsi Riau" conducted on 20 March 2024 according to Letter No: HP.01.03/859-14/III/2024 dated 18 March 2024 for land parcell 1,287.4027 ha located at Siak Regency. | |
| - Field review by land inspection committee B "Kementrian Agraria dan Tata Ruang/Badan Pertanahan Nasional Kantor Wilayah Badan Pertanahan Provinsi Riau" conducted on 4 January 2024 according to Letter No: HP.01.03/10-14/I/2024 | |
| | |

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| | | dated 2 January 2024 for land parcell 4,402.6689 ha located at Siak Regency. Risalah Panitia Pemeriksaan Tanah B Nomor 9/2024, dated 28/03/2024 According to field review committee B "Kementrian Agraria dan Tata Ruang/Badan Pertanahan Nasional Kantor Wilayah Badan Pertanahan Provinsi Riau" total area propose for new HGU was 5,690.072 ha from previous HGU 5,781.47 Ha. Area 91.40 ha was excluded from HGU due to another use of area and enclave area not manage by company. | |
|-------|--|---|----------|
| 4.5.2 | (C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions. All the relevant information and documents are made available, and community have option of resourced access to independent third-party advice through a documented, long-term and two- way process of consultation and negotiation. Critical (Major) compliance - | There is no new planting within certified area of PT Inti Indosawit Subur – Simpang Perak Estate and Scheme Smallholder after November 2005. Currently, replanting activities are still in progress. All of the immature area was for replanting, for oil palm with planting year 1988, 1989, 1990 and 1991. Based on documents review and interview with local government and local communities surrounding the company, it was noted that all oil palm developments in PT IIS Buatan Group go through a comprehensive process, including in particular, full respect for their legal and customary rights to territories, lands and resources through the local community's own representative institutions. All relevant information and documents are available, and communities have the option of accessing resources for independent third party advice through a documented, long-term and two-way process of consultation and negotiation. PT. Inti Indosawit Subur has prepared a mechanism to identify and calculate fair compensation or loss of legal or costumary rights to land set out in the standard operating procedure (SOP) "Prosedur Penyelesaian Sengketa Lahan No.AA-GL-5003-1-R2", dated 8 th May 2015. The mechanism has taken into account FPIC Guide for RSPO Member 2015, whereby the procedure regulated information convey, negotiation, participative boundary measurement, involvement of other | Complied |

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| | | party and neighboring parties – in the boundary of the conflicted area (if any). | |
|-------|--|--|----------|
| 4.5.3 | Evidence is available that affected local peoples understand they have the right to say 'agree' or 'not agree' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations. - Minor compliance - | There is no new planting within certified area of PT Inti Indosawit Subur – Simpang Perak Estate and Scheme Smallholder after November 2005. Currently, replanting activities are still in progress. All of the immature area was for replanting, for oil palm with planting year 1988, 1989, 1990 and 1991. Based on documents review and interview with local government and local communities surrounding the company, it was noted that affected local communities understand that they have the right to say 'agree' or 'disagree' to the planned operations on their lands before and during initial discussions, during the information gathering and related consultation stages, during negotiations, and until agreement with a unit of certification signed and endorsed by the local community. Negotiated agreements are non-coercive and voluntary and are entered into prior to new operations. | Complied |
| 4.5.4 | To ensure local food and water security and as part of the FPIC process, SEIA participation and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of land allocations process. - Minor compliance - | There is no new planting within certified area of PT Inti Indosawit Subur – Simpang Perak Estate and Scheme Smallholder after November 2005. Currently, replanting activities are still in progress. All of the immature area was for replanting, for oil palm with planting year 1988, 1989, 1990 and 1991. Based on documents review and interview with local government and local communities surrounding the company, it was noted that companies – PT IIS Buatan Group have confirmed their needs for food and clean water; for long-term needs the company has also ensured that related to food security and water needs around the plantations and this is done through the FPIC process, SEIA participation and participatory land use planning with local communities, various food and air supply options are considered. There is transparency in the land allocation process. Transparency and as part of the FPIC process, SEIA | Complied |

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| | | participation and participatory land use planning with local communities, various food and air supply options were considered. There is transparency in the land allocation process. | |
|-------|--|--|----------|
| 4.5.5 | Evidence is available that the affected communities and rights holders have had the option to access information and advice, that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands. - Minor compliance - | There is no new planting within certified area of PT Inti Indosawit Subur – Simpang Perak Estate and Scheme Smallholder after November 2005. Currently, replanting activities are still in progress. All of the immature area was for replanting, for oil palm with planting year 1988, 1989, 1990 and 1991. | Complied |
| | | Based on documents review and interview with local government and local communities surrounding the company, it was noted that affected communities and rights-holders have options to access information and advice, independent of the project proponent, regarding the legal, economic, environmental and social implications of the proposed operations on their lands. | |
| | | Procedures related to information and consultation have been established by the company, SOP No. AAGL-5008.1-R1: Handling of Requests for Stakeholder Information. | |
| 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 - | There is no new planting within certified area of PT Inti Indosawit Subur – Simpang Perak Estate and Scheme Smallholder after November 2005. Currently, replanting activities are still in progress. All of the immature area was for replanting, for oil palm with planting year 1988, 1989, 1990 and 1991. | Complied |
| | | Based on documents review and interview with local government and local communities surrounding the company, it was noted that communities or their representatives provide approval for the initial planning stage of operations prior to the issuance of new concessions or land titles to operators. | |
| 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 | Based on document verification, management unit has no land expansion or new planting after November 2018. | Complied |

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| | the national interest (eminent domain) without FPIC process, except in cases of smallholders benefitting from agrarian reform or anti-drug programmes. - Minor compliance - | PT. Inti Indosawit Subur has prepared a mechanism to identify and calculate fair compensation or loss of legal or costumary rights to land set out in the standard operating procedure (SOP) "Prosedur Penyelesaian Sengketa Lahan No.AA-GL-5003-1-R2", dated 8 th May 2015. The mechanism has taken into account FPIC Guide for RSPO Member 2015, whereby the procedure regulated information convey, negotiation, participative boundary measurement, involvement of other party and neighboring parties – in the boundary of the conflicted area (if any). | |
|-------|---|---|----------------|
| 4.5.8 | (C) New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance - | Based on document verification, management unit has no land expansion or new planting after November 2018. The Company and scheme smallholders has "Hak Guna Usaha (HGU)/"Sertifikat Hak Milik (SHM)" Land title for smallholders. There is no customary land or legal rights within the company and scheme smallholdres area as the land originally was allocated as part of transmigration program. The history of land acquisition dates back on period 1980's so the FPIC process has been cleared. | Complied |
| | 4.6: Any negotiations concerning compensation for loss of legal, customation, local communities and other stakeholders to express their views through the | | les indigenous |
| 4.6.1 | (C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place. - Critical (Major) compliance - | Based on the ASA 2.3 audit results, there are no changes related to the Procedure for identifying legal, costumary 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 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, | Complied |

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| | | 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. | |
|-------|--|---|----------|
| | | For smallholders, legal ownership is in the form of Land Certificate Ownership Right (Sertifikat Hak Milik). There is no issue related land dispute during 2023-2024 period related to the ownership land. | |
| | | Based on interview, KUD Jaya Makmur and KUD Sumber Rejeki, sampled smallholder member and relevant authority, Dinas Perkebunan Kabupaten Pelalawan (plantation agency); there was no case of land conflict between smallholder member and/or conflict with other party related to land status or boundary. Smallholders land obtained based on government program "Transmigrasi" in early 1980's, therefore all smallholders plots already have legal use rights | |
| | | Cooperatives have a conflicts resolution mechanism in "Mekanisme Penanganan Konflik" dated 1st August 2014. The mechanism explaining flow process to resolution on land conflict, with involvement of company, village government and all related agencies. | |
| 4.6.2 | (C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Critical (Major) compliance - | Based on the ASA 2.3 audit results, there are no changes related to the Procedure for identifying legal, costumary or user right, the documents are still the same as the previous audit results. Unit of certification has procedure of land compensation on " <i>Prosedur Penyelesaian Sengketa Lahan No.AA-GL-5003-1-R2"</i> , dated 8th May 2015, which explaining that the settlement of land disputes is carried out through negotiation process involving deliberation of regional leaders, respective government agencies. Value of compensation should be agreed by both parties and recorded on the agreement. Calculations carried out with reasonable prices in accordance with the taxable value and state of the areas. Procedure do not distinguish the compensation calculation based on gender, local community or ethnic groups. | Complied |

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| | | For smallholders, legal ownership is in the form of Land Certificate Ownership Right (Sertifikat Hak Milik). There is no issue related land dispute during 2023-2024 period related to the ownership land. Based on interview with sampled smallholder member and relevant authority, Dinas Perkebunan Kabupaten Pelalawan (plantation agency); there was no case of land conflict between smallholder member and/or conflict with other party related to land status or boundary. Smallholders land obtained based on government program "Transmigrasi" in early | |
|-------|---|--|----------|
| | | 1980's, therefore all smallholders plots already have legal use rights Cooperatives have a conflicts resolution mechanism in "Mekanisme Penanganan Konflik" dated 1st August 2014. The mechanism explaining flow process to resolution on land conflict, with involvement of company, village government and all related agencies. | |
| 4.6.3 | Evidence is available that equal opportunities are provided to both men and women to hold land titles for smallholdings (if possible based on local law, customs and/or agreement). - Minor compliance - | Until the surveillance audit 2.3 was carried out, there is currently no new land compensation. Based on documents review and interview with local government and local communities surrounding the company, it was noted the company has existed since 1980's. There was no customary land or other legal rights within the company areas and in smallholder plantation. In addition, there is no land dispute between the company and communities surrounding their operational areas. | Complied |
| | | Until the surveillance audit-2.3 was carried out, there is currently no new land compensation. The compensation documentation process was completed before 1991, this is in line with the explanation from KUD Bhakti Mandiri farmers and KUD Sejahtera farmers. Where the plasma that is formed is part of the government program contained in the document " <i>Keputusan menteri Transmigrasi No.Kep.90/MEN/1990 tentang Izin Pelaksanaan Transmigrasi PIR-Trans kepad PT. Inti Indosawit Subur dengan Komoditas Kelapa Sawit di Lokasi Pangkalan</i> | |

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| | | <i>Kuras, Kabupaten Kampar dan Pasir Penyu, Kabupaten Indragiri Hulu, Provinsi Riau</i> '' dated 29 th July 1991. | |
|-------|--|--|----------------|
| 4.6.4 | The process and outcomes of any negotiated agreements, compensation and payments are documented with evidence of the participation of affected parties and made available to them. - Minor compliance - | Until the surveillance audit 2.3 was carried out, there is currently no new land compensation. Based on documents review and interview with local government and local communities surrounding the company, it was noted the company has existed since 1980's. There was no customary land or other legal rights within the company areas and in smallholder plantation. In addition, there is no land dispute between the company and communities surrounding their operational areas. Until the surveillance audit-2.3 was carried out, there is currently no new land compensation. The compensation documentation process was completed before 1991, this is in line with the explanation from KUD | Complied |
| | | Bhakti Mandiri farmers and KUD Sejahtera farmers. Where the plasma that is formed is part of the government program contained in the document " <i>Keputusan menteri Transmigrasi No.Kep.90/MEN/1990</i> <i>tentang Izin Pelaksanaan Transmigrasi PIR-Trans kepad PT. Inti</i> <i>Indosawit Subur I dengan Komoditas Kelapa Sawit di Lokasi Pangkalan</i> <i>Kuras, Kabupaten Kampar dan Pasir Penyu, Kabupaten Indragiri Hulu,</i> <i>Provinsi Riau</i> " dated 29 th July 1991. | |
| | 1.7: Where it can be demonstrated that local peoples have legal, customary subject to their FPIC and negotiated agreements. | or user rights, they are compensated for any agreed land acquisitions and | relinquishment |
| 4.7.1 | (C) A mutually agreed procedure for identifying people entitled to compensation is in place. - Critical (Major) compliance - | Based on the ASA 2.3 audit results, there are no changes related to the for identifying people entitled to compensation. The documents are still the same as the previous audit results. | Complied |
| | | Until the surveillance audit 2.3 was carried out, there is currently no new land compensation. | |
| | | Simpang Perak Estate: | |

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| | | PT. Inti Indosawit Subur – Buatan II has prepared a mechanism to identify and calculate fair compensation or loss of legal or costumary rights to land set out in the standard operating procedure (SOP) "Prosedur Penyelesaian Sengketa Lahan No.AA-GL-5003-1-R2", dated 8th May 2015. The mechanism has taken into account FPIC Guide for RSPO Member 2015, whereby the procedure regulated information convey, negotiation, participative boundary measurement, involvement | |
|-------|--|--|----------|
| | | of other party and neighboring parties – in the boundary of the conflicted area (if any). | |
| | | Scheme Smallholders: | |
| | | Based on interview, KUD Birawa bakti, KUD Tani Rukun, KUD Mitra Usaha, KUD Makarti Sawit sampled smallholder member (farmer) and relevant authority, Plantation Agency of Siak District; there was no case of land conflict between smallholder member and/or conflict with other party related to land status or boundary. | |
| | | Cooperatives have a conflicts resolution mechanism in "Mekanisme Penanganan Konflik" dated 1st August 2014. The mechanism explaining flow process to resolution on land conflict, with involvement of company, village government and all related agencies. | |
| 4.7.2 | (C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties. | Based on the ASA 2.3 audit results, there are no changes related to the for identifying people entitled to compensation. The documents are still the same as the previous audit results. | Complied |
| | - Critical (Major) compliance - | Until the surveillance audit 2.3 was carried out, there is currently no new land compensation. | |
| | | Simpang Perak Estate: | |
| | | PT. Inti Indosawit Subur – Buatan has prepared a mechanism to identify and calculate fair compensation or loss of legal or customary rights to land set out in the standard operating procedure (SOP) "Prosedur | |

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| Penyelesaian Sengketa Lahan No.AA-GL-5003-1-R2", dated 8th May 2015. The mechanism has taken into account FPIC Guide for RSPO Member 2015, whereby the procedure regulated information convey, negotiation, participative boundary measurement, involvement of other party and neighboring parties – in the boundary of the conflicted area (if any). | |
|---|--|
| The procedure covers land dispute handling mechanism, negotiation process, and verification upon legal ownership evidence up to land compensation. Should negotiation process fails, any land dispute will be processed through legal/litigation mechanism. During the process, a complete record is maintained. | |
| Based on mechanism, public relation officer will receive information of any complaint, grievance and land dispute/claims and records under the logbook. | |
| PT IIS-Buatan II POM & Estate have not acquiring any additional land and not involved in any land compensation payments. Therefore the mechanism only applicable to resolve land dispute within company's HGU. Land ownership from previous landowner becomes important document in order to continue negotiation process against land claim. Land claim without supporting evidence of land ownership, will be treated with approach and legal manner. | |
| There is no negotiation/compensation payment currently for both estate and scheme smallholders. The land has settled now, no any complaint was received in the last few years. In Scheme smallholder's area, it was settled since the "PIR Project" started due to this project from Central Government, where the land status is "Clean and Clear". | |
| Based on the results of interviews with the Environment Agency (Dinas Lingkungan Hidup) and Plantation Agency (Dinas Perkebunan) of Pelalawan Regency, there is no land dispute between PT IIS – Buatan and the ownership of the surrounding community. | |

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| | | |] |
|-------|---|--|----------|
| | | Scheme Smallholders: | |
| | | Based on interview with sampled smallholder member (farmer) and relevant authority, Plantation Agency of Siak District; there was no case of land conflict between smallholder member and/or conflict with other party related to land status or boundary | |
| | | Cooperatives have a conflicts resolution mechanism in "Mekanisme Penanganan Konflik" dated 1st August 2014. The mechanism explaining flow process to resolution on land conflict, with involvement of company, village government and all related agencies. | |
| | | There is no new planting within certified area of PT Inti Indosawit Subur – Simpang Perak Estate and Buatan II Plasma after November 2005. Currently, replanting activities are still in progress. All of the immature area was for replanting, for oil palm with planting year 1988, 1989, 1990 and 1991. | |
| 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 - | Based on the ASA 2.3 audit results, there are no changes related to the for identifying people entitled to compensation. The documents are still the same as the previous audit results. Until the surveillance audit 2.3 was carried out, there is currently no new land compensation. | Complied |
| | | Simpang Perak Estate: | |
| | | PT. Inti Indosawit Subur – Buatan has prepared a mechanism to identify and calculate fair compensation or loss of legal or customary rights to land set out in the standard operating procedure (SOP) "Prosedur Penyelesaian Sengketa Lahan No.AA-GL-5003-1-R2", dated 8th May 2015. The mechanism has taken into account FPIC Guide for RSPO Member 2015, whereby the procedure regulated information convey, negotiation, participative boundary measurement, involvement of other | |

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| party and neighboring parties – in the boundary of the conflicted area (if any). | |
|---|--|
| The procedure covers land dispute handling mechanism, negotiation process, and verification upon legal ownership evidence up to land compensation. Should negotiation process fails, any land dispute will be processed through legal/litigation mechanism. During the process, a complete record is maintained. | |
| Based on mechanism, public relation officer will receive information of any complaint, grievance and land dispute/claims and records under the logbook. | |
| PT IIS-Buatan II POM & Estate have not acquiring any additional land and not involved in any land compensation payments. Therefore the mechanism only applicable to resolve land dispute within company's HGU. Land ownership from previous landowner becomes important document in order to continue negotiation process against land claim. Land claim without supporting evidence of land ownership, will be treated with approach and legal manner. | |
| There is no negotiation/compensation payment currently for both estate and scheme smallholders. The land has settled now, no any complaint was received in the last few years. In Scheme smallholder's area, it was settled since the "PIR Project" started due to this project from Central Government, where the land status is "Clean and Clear". | |
| Based on the results of interviews with the Environment Agency (Dinas Lingkungan Hidup) and Plantation Agency (Dinas Perkebunan) of Pelalawan Regency, there is no land dispute between PT IIS – Buatan and the ownership of the surrounding community. | |
| Scheme Smallholders: | |
| Based on interview with sampled smallholder member (farmer) and relevant authority, Plantation Agency of Siak District; there was no case | |

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| | | of land conflict between smallholder member and/or conflict with other party related to land status or boundary Cooperatives have a conflicts resolution mechanism in "Mekanisme Penanganan Konflik" dated 1st August 2014. The mechanism explaining flow process to resolution on land conflict, with involvement of company, village government and all related agencies. There is no new planting within certified area of PT Inti Indosawit Subur – Simpang Perak Estate and Buatan II Plasma after November 2005. Currently, replanting activities are still in progress. All of the immature area was for replanting, for oil palm with planting year 1988, 1989, 1990 and 1991. | |
|-------------------------|--|---|-----------------------------|
| Criteria 4 4.8.1 | 1.8: The right to use the land is demonstrated and is not legitimately contes: 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 - | ted by local people who can demonstrated that they have legal customary, There is no land conflict present in area of PT IIS – Simpang Perak Estate and scheme smallholders. PT. Inti Indosawit Subur has prepared a mechanism to handle land conflict according to standard operating procedure (SOP) "Prosedur Penyelesaian Sengketa Lahan No.AA-GL-5003-1-R2", dated 8th May 2015. The mechanism has taken into account FPIC Guide for RSPO Member 2015, whereby the procedure regulated information convey, negotiation, participative boundary measurement, involvement of other party and neighboring parties – in the boundary of the conflicted area (if any). | or user rights. 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 - | There is no new land acquisition or new expansion by PT IIS – Simpang Perak Estate and scheme smallholders. Until this assessment, there were no conflicts and land disputes within the certificate holder operational area. This is also in line with the results of interviews with surrounding communities (Bukit Harapan Village) and related agencies during a public consultation as well as searching in | Complied |

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| | | internet, which stating that there were no land conflicts in the company's operational area. | |
|-------|---|---|----------|
| | | All company plantation and scheme smallholder area have been issued with valid land title in the form of " <i>Hak Guna Usaha/HGU</i> ' for company and " <i>Sertifikat Hak Milik</i> " for smallholder. | |
| 4.8.3 | Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations | There is no land conflict present in area of PT IIS – Simpang Perak Estate and scheme smallholders. | Complied |
| | 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 - | The Company and scheme smallholders has "Hak Guna Usaha (HGU)/"Sertifikat Hak Milik (SHM)" Land title for smallholders. There is no customary land or legal rights within the company and scheme smallholdres area as the land originally was allocated as part of transmigration program. | |
| | | This is also in line with the results of interviews with surrounding communities (Bukit Harapan Village) and related agencies during a public consultation as well as searching in internet, which stating that there were no land conflicts in the company's operational area. | |
| 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 | There is no land conflict present in area of PT IIS – Simpang Perak Estate and scheme smallholders. | Complied |
| | (including neighbouring communities where applicable). - Minor compliance - | PT. Inti Indosawit Subur has prepared a mechanism to handle land conflict according to standard operating procedure (SOP) "Prosedur Penyelesaian Sengketa Lahan No.AA-GL-5003-1-R2", dated 8 th May 2015. The mechanism has taken into account FPIC Guide for RSPO Member 2015, whereby the procedure regulated information convey, negotiation, participative boundary measurement, involvement of other party and neighboring parties – in the boundary of the conflicted area (if any). | |

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| Criteria | 5.1: The unit of certification deals fairly and transparently with all smallhold | ers (Independent and Scheme) and other local businesses. | |
|----------|---|--|----------|
| 5.1.1 | Current and previous period prices for FFB are publicly available and accessible by smallholders. - Minor compliance - | Based on interview with management representative during ASA2.3 i.e. public affair staff, sustainability and plasma manager obtained information that the actual prices informed directly to the board of plasma or other FFB supplier. The actual prices also informed by social media messenger such as WhatsApp or by phone call. | Complied |
| | | During the audit, Kebun Plasma Buatan II has showed the FFB payment receipt period May 2024 in accordance with official FFB price that issued by FFB Pricing Team of Riau Province. All smallholder classified as up to 25 year which is the lower price due to the extraction that diminished. Sighted the payments record of KUD Bhirawa Bhakti, KUD Tani Rukun, KUD Mitra Usaha, KUD Makarti Sawit period May 2024. All payments have been complied with the pricing that stipulated by FFB Pricing Team of Riau Province. | |
| 5.1.2 | (C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders. - Critical (Major) compliance - | Based on document verification of Memorandum of Understanding (MoU) between the smallholders/KUD and PT Inti Indosawit Subur obtain information that the FFB pricing has followed the official FFB price stipulated by FFB Pricing Team of Riau Province. According to the local regulation in Riau Province, the FFB Price updated weekly (every 7 days). The FFB payments conducted monthly, for example, there was a receipt of FFB payments period of May 2024 on behalf of KUD Bhirawa Bhakti, KUD Tani Rukun, KUD Mitra Usaha, KUD Makarti Sawit. | Complied |
| 5.1.3 | (C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented. - Critical (Major) compliance - | Management of PT Inti Indosawit Subur – Buatan Group has a commitment to share the RSPO premium price in accordance with the agreement with their smallholder. Premium sharing is not distributed in the form of money but in the form of smallholder empowerment activities aimed at increasing the competence and competitiveness of smallholders based on participatory suggest from the smallholders. | Complied |

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| | | During this audit obtained information that the premium sharing for Buatan Plasma period 2022/2023 has been distributed, the distribution of premium sharing has been based on the needs of each KUD through the stakeholder meeting agenda, this can be seen from the different types of premium sharing distributed, for example: KUD Tani Rukun (Simpang Perak Jaya Village), dated 27 May 2024, support for owl cage "Kandang Burung Hantu/KBH" 3 pcs IDR 5,550,000. KUD Mitra Usaha (Buatan Baru Village), dated 27 May 2024, support for owl cage "Kandang Burung Hantu/KBH" 2 pcs IDR 3,700,000. KUD Bhirawa Bakti (Buana Bhakti Village), dated 24 June 2024, support for boundaries pages 70 pcs IDR 3,150,000. KUD Mitra Usaha (Buatan Baru Village Village), dated 24 June 2024, support for boundaries pages 86 pcs IDR 3,950,000. Support of rotational cattle program (4 cattle per KUD), dated 22 April 2024, for example: KUD Bhirawa Bakti 4 cattles, KUD Tani Rukun 4 cattles, KUD Buatan Jaya 4 cattles, | |
|-------|---|--|----------|
| | | Based on interview with the smallholder's representatives known that the training has given the positive insight to the smallholders to facing the replanting period. Some smallholders have prepared the alternative income during the replanting with other business such as quail farm, goat and cows and domestic waste composting. | |
| 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- | The smallholder's member of Buatan Plasma originated from government transmigration program on 1990 – 1991. Mostly from East Java, West Java and local area (Riau Province). Based on information obtained during ASA2.3 known that some of smallholders' member were women. The annual meeting of KUD always invited all members which | Complied |

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payments through FFB price reductions for replanting and/or, other is some women. All the decision made was involved the smallholder support mechanisms where applicable. members, including women members. - Critical (Major) compliance -Contracts are fair, legal and transparent and have an agreed timeframe. 5.1.5 Based on interview with management representative i.e. Public affair Complied staff, sustainability and plasma manager obtained information that all - Minor compliance the contract is signed by both parties. Based on document all contract is written in Bahasa. For example: Contract with Plasma (KUD Bhirawa Bhakti, KUD Tani Rukun, KUD Mitra Usaha, KUD Makarti Sawit) for supply FFB according to Perjanjian Kerjasama between Koperasi Unit Desa "Perjanjian Kerjasama antara Petani Peserta PIR-Trans dengan PT. Inti Indosawit Subur". Based on document review and interview with KUD confirmed that agreement between company and KUDs is made fairly, legal and transparent and have an agreed timeframe. (C) Agreed payments are made in a timely manner and receipts specifying Based on document verification sighted that monthly invoice for FFB Complied 5.1.6 price, weigh, deductions and amount paid are given. payment contains data of price, weigh, deductions and amount paid are given. - Critical (Major) compliance -Based on document all contract is written in Bahasa. For example: Contract with Plasma (KUD Bhirawa Bhakti, KUD Tani Rukun, KUD Mitra Usaha, KUD Makarti Sawit) for supply FFB according to Perjanjian Kerjasama between Koperasi Unit Desa "Perjanjian Kerjasama antara Petani Peserta PIR-Trans dengan PT. Inti Indosawit Subur". Based on document review and interview with KUD confirmed that agreement between company and KUDs is made fairly, legal and transparent and have an agreed timeframe. 5.1.7 Weighing equipment is verified by an independent third party on a regular Weighbridge in Buatan II POM is verified by government agency in Complied annual basis. Latest verification was performed on 5 October 2023 by basis. UPTD METROLOGI LEGAL Dinas Perindustrian dan Perdagangan - Minor compliance -

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| | | Kabupaten Pelalawan. Weighbridges calibration certificate was sighted during audit: Surat Keterangan Hasil Pengujian Nomor: 510.3/DKUKMPP-UM/SKHP/2023/175, dated 5 October 2023, valid until 1 October 2024. Weighbridge Avery weigh Tronix; Serial Number 161356025; Type: E1205; Capacity 50,000 kg. Surat Keterangan Hasil Pengujian Nomor: 510.3/DKUKMPP-UM/SKHP/2023/176, dated 5 October 2023, valid until 1 October 2024. Weighbridge Avery weigh Tronix; Serial Number 162056109; Type: E1205; Capacity 50,000 kg. According to certificate it was noted that verification results were comply to requirement, endorsed based on UU RI No. 2 Year 1981 concerning Metrology Legal. | |
|-------|--|--|----------|
| 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 - | Based on review of agreement, the company carried out the development and provide supervision in Scheme Smallholder. The company support Scheme Smallholder in form of supervision in upkeep, fertilizer application, harvesting, FFB transport and implementation of RSPO P&C requirements. For independent Smallholder, supports is provided in the form of CSV Program (Create Share Value). Form of support is the company give coaching to the independent smallholder related good agriculture practices, organisation and administration. Those independent smallholders expected to be certified in next few years. | 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 - | Simpang Perak Estate and Mill There is no changes related to the mechanism to handle complaint from external party in this surveillant audit 2.3, as written in "Mekanisme Penanganan Keluhan Pihak Luar" – complaint handling mechanism (Doc. No. SOP AA-GL-5005-RO-01 dated 22 August 2011) while complaint from internal regulated under "Mekanisme Penyampaian Keluhan dan | Complied |

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| labor issues, etc. Internal Reporting: There are log books located in all estates and mills managed by Asian Agri's business units. Employees are free to file concerns and reports in these log books, | Channel/Remarks Log Books: Disruption Complaint |
|---|---|
| Asian Agri is committed to responding quickly and constructively to any grievance raised against any of our own operations or our suppliers, and to report them publicly. We develop a robust grievance procedure to resolve all verifiable complaints and conflicts with all related stakeholders such as land conflicts, social conflicts, human right issues, | |
| than 14 days. These mechanisms have communicated to external parties and disseminated to PT IIS employees. Certificate holder has had new procedure namely SOP Penyampaian dan Penyelesaian Keluhan Karyawan (SOP No: AA-HR-308.5-R1 effective dated 1 December 2019). This procedure also protected whistle blower anonymity. Referring to Asian Agri's website https://www.asianagri.com/id/panel-keberlanjutan/keluhan-engaduan. | |
| Penyelesaian Keluhan Karyawan" – Employe mechanism (Doc. No. SOP-AA-HR-3008-RO | |

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| Confidential reports may be submitted through email or telephone to protect the identity of the reporter. | Poster on Whistleblowing is placed in every office of Asian Agri. Telephone: +62 811 910 7916 Email: attention@asianag |
|--|--|
| External Reporting: | ri.com Channel/Remarks |
| Stakeholders of Asian Agri including but not limited to Government, smallholders, suppliers, vendors, academicians, NGOs, media, etc), are provided different channels to report their concerns/findings. Reporters may share their concerns and information on business misconduct, corruption, harassment, criminal acts, environment, etc. All reports will be treated confidentially and if deemed appropriate, updates will be made publicly available as per our Grievance mechanism. | Email: grievance@asi anagri.com Address: Jl. MH Thamrin No. 31 Jakarta 10230 Indonesia Fax: +62 21 230 1120 Attn.: Grievance Secretariat Grievance submissions should be made using the Grievance Submission Form. |
| This procedure is also applied to scheme sr procedure provides guidelines on handl sustainability practices across our supply | ing grievances related to |

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| matters in our operations. The following grievance channels are available to support business transparency: | |
|---|--|
| The last socialization of SOP namely SOP Penyampaian dan Penyelesaian Keluhan Karyawan (SOP No: AA-HR-308.5-R1 effective dated 1 December 2019) was performed on 15-16 April 2024 and attended by 130 participants. | |
| Based on interviews with villagers around the plantation and related stakeholder (Plantation office and Environment Office of Pelalawan Regency), there is no complaint raised during the last audit until this onsite Surveillance audit (on period 2023-2024). | |
| Based on the results of the review of the log book of external and internal complaints, there are several complaints from internal companies (employees) including: | |
| There are several complaints from employees related to damage to the house, all of which have been followed up by submitting a repair plan that will be carried out on the employee's house, the reply is not more than 14 days. The follow-up of the complaints was to repair some housing and the company has made a comprehensive repair plan for employee housing that requires repair. | |
| Scheme smallholders: | |
| The scheme smallholders have a mechanism of consultation and communication in " <i>Mekanisme Komunikasi, Konsultasi dan Keluhan</i> ", dated 3rd January 2011. The procedure has been communicated to all members on 5 December 2023 and also recorded into the "Buku Pintar" for each of farmer. | |
| During this surveillance audit (ASA 2.3), according the interview with several farmers on the ground and review document (log book log book of external and internal complaints), that there is no any grievance from farmers member. | |
| | |

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| Criteria | 5.2: The unit of certification supports improved livelihoods of smallholders a | nd their inclusion in sustainable palm oil value chains. | |
|----------|--|---|----------|
| 5.2.1 | The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification. - Minor compliance - | PT Inti Indosawit Subur – Buatan Group has 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. Until audit ASA 2.3 PT Inti Indosawit Subur has maintained collaboration with smallholders around plantations and is incorporated in the CSV (Create Share Value) Program, namely: Sawit Jaya Mandiri Association with an area of 832 ha located in SP2, SP4 and SP6 village with a total of 13 farmer groups. The PT Inti Indosawit Subur CSV team has provided guidance to smallholder farmers by conducting several training activities related to good agriculture practices and RSPO standard. PT Inti Indosawit Subur – Buatan Group has developed and implement livelihood improvement programmes of Smallholders in surrounding communities. The company is helping the development through provides technical guidance, financial credit, fertilizer support and receiving the FFB production from certified Scheme Smallholder (KUD). | Complied |
| 5.2.2 | The unit of certification develops and implements livelihood improvement programmes, including at least capacity building to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder). - Minor compliance - | There are no changes of compliance statement compare to previous audit. PT Inti Indosawit Subur – Buatan Group sets a scheme manager, with field assistant assigned for each cooperative to improve smallholder management, including productivity. Each year, company provisioned training program, aside from day-to-day operation monitoring by field assistant. The verified sample for example organization has carried out socialization related to the production, GAP, the socialization has been carride out in 30 December 2023 in KUD Tani Rukun. | Complied |

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| 5.2.3 | Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. Minor compliance - | Buatan II POM supplied by own estates (Simpang Perak Estate), smallholder from 8 KUD's (KUD Mulus Rahayu, KUD Bhirawa Bakti, KUD Tani Rukun, KUD Kebun Sawit Harapan, KUD Buatan Jaya, KUD Mitra Usaha, KUD Makarti Sawit and KUD Bina Mulia) with total 1,741 smallholders and direct of FFB supplier (Kebun Tanah Kas Desa -3). Based on interview with smallholder representatives sampled during audit CAV 2.3, obtained information that entire land has been granted by government (private land title/SHM). | Complied |
|-------|---|---|----------|
| | | According to the signboard in mill's gate, Buatan II POM does not accept FFB from illegal sources (forest area or crop stolen). All FFB from third parties shall comply with regulation. Mill's staff told that FFB Purchasing Department has set the procedures for their supplier as follows: | |
| | | • New supplier shall propose their FFB purchased offer including submitted the name and land legality of each potential farmer. | |
| | | • FFB Purchasing Department verify the geolocation of potential farmer that submitted by the third parties. | |
| | | • New supplier shall sign the agreement which stated to not send illegal FFB sources. This agreement will automatically be cancelled if any violation on this clause. | |
| | | • The FFB transporter shall signed the zero illegal FFB statement letter in security gate in each delivery note. | |
| | | Based on interview with smallholder sampled during audit CAV 2.3, obtained information that entire land has been granted by government (private land title). Asian Agri's through his subsidiary PT. Inti Indosawit Subur fully supported their smallholder to be certified by ensuring all FFB come from legal sources and comply with national regulation. They also conducted good engagement to demonstrated best management practices in agronomy, environmental handling and safety procedures. | |

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| | | For example, each plot received 4 unit barn owl box to help them control rat population. During the audit, auditor also obtain information that PT. Inti Indosawit Subur are now assisting the smallholders on replanting project in collaborated with local government. This aims to ensure that farmers produce palm oil sustainably. | |
|-------|---|--|----------|
| 5.2.4 | (C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance - | PT Inti Indosawit Subur - Buatan Group has created a training program especially related to the handling/use of herbicides and pesticides for plasma farmers on 5 December 2023. During the audit, auditor also interviewed some smallholder representatives and obtain information that the company has provide training session for them on how to be handling pesticide safely. For example, pesticide applicator shall use appropriate PPE during application, no smoke, avoid the direction of wind blows and cleaned their body after application to reduce contamination. | Complied |
| 5.2.5 | The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme. - Minor compliance - | Annual review of progress of the smallholder support by Asian Agri's can be see and downloaded in Asian Agri's website : <u>https://www.asianagri.com/en/sustainability/sustainability-reports/</u> . That document is publicly available. The auditor has been reviewed the Asian Agri Sustainability Report 2022, which published on May 2023. The report was prepared in accordance with the Global Reporting Initiative (GRI) Standards, covering GRI 1: Foundation 2021, GRI 2: General Disclosures 2021, GRI 3: Material Topics 2021, GRI 13: Agriculture, Aquaculture and Fishing Sectors 2022, and the latest GRI Topic Standards. Topics about Smallholders Empowerment available in page 38 - 49 of the report. There are two types of smallholder which is Scheme Smallholder and Independent Smallholders. For independent | Complied |

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| | | smallholder, the company helped them to achieve RSPO Certification | |
|----------|---|--|----------|
| | | through Corporate Shared Value (CSV) Program. | |
| | | As of 2022, the company has work with 27,082 scheme smallholder with coverage area of 52,899 hectar; and, 8,525 independent smallholders with coverage area of 39,116 hectares. | |
| | | Based on field visits and interviews with smallholder representatives, each KUD's has been supported in IPM program. They are equipped with beneficial plants and barn owl boxes (6 units each plot). Certificate Holder also conducted training in order to ensure the smallholder's competency. For example: | |
| | | Basic Fire Training on 6 June 2024 | |
| | | Health and Safety training on 6 June 2024 | |
| | | Hazardous waste management training on 5 December 2023 | |
| | | HCV area identification and management on 6 June 2024 | |
| | | First Aider and Emergency Response on 6 June 2024 | |
| - | e 6: respect workers' rights and conditions orkers' rights and ensure safe and decent working conditions. | | |
| Criteria | 5.1: Any form of discrimination is prohibited. | | |
| 6.1.1 | (C) A publicity available non-discrimination and equal opportunity policy | Buatan II POM and Estate: | Complied |
| | 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. | Since 2014, PT Inti Indosawit Subur has established a Company Policy on Equal Opportunity as documented in the "Company Policy", dated December 1, 2014: | |
| | - Critical (Major) compliance - | "Treating all employees fairly, both in terms of recruitment, assessment of working conditions and environment, and representation without regard to ethnicity, caste, country of origin, religion/belief, disability, gender, sexual organization, trade union membership, political affiliation and/or age" - <i>memperlakukan semua anggota koperasi secara adil, dan</i> <i>menghormati hak asasi manusia, dan perwakilan tanpa membeda</i> - | |

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| bedakan suku, ras, kasta, negara asal, agama/keyakinan, disabilitas, gender, orientasi seksual, afiliasi serikat pekerja, afiliasi politik, atau usia. |
|---|
| The company policy has been communicated to all employees of PT Inti Indosawit Subur – Buatan Group on 15 January 2024 (verified data: attendance list, socialization materials, documentation). Socialization to all stakeholders (including local contractors) was also carried out on 14 March 2024 which was attended by 15 stakeholders. |
| Scheme Smallholder: |
| Group Manager has set ICS Policy under "Group Manager Policy" signed by Buatan II ICS Group Manager, for example: |
| - KUD Tani Rukun (Scheme Smallholder) dated 19 December 2023, has been socialized to all smallholders on 19 December 2023. |
| - KUD Mitra Usaha (Scheme Smallholder) dated 20 Desember 2023, has been socialized to all smallholders on 20 Desember 2023 |
| - KUD Makarti Sawit (Scheme Smallholder) dated 13 December 2023, has been socialized to all smallholders on 13 December 2023. |
| - KUD Bhirawa Bhakti (Scheme Smallholder) dated 25 January 2024, has been socialized to all smallholders on 25 January 2024 |
| In the Group Manager Policy, which is in point 10, it is stated: "Respecting human rights by treating all employees and farmer cooperatives fairly, both in terms of recruitment, assessment, working conditions and environment and representation without regard to ethnicity, caste, country of origin, religion/belief, disability, gender, |

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| | | sexual orientation, trade union membership, political affiliation and/or age". | |
|-------|---|---|----------|
| | | Based on interviews with samllholders sample (14 smallholders at KUD Tani Rukun, 13 samllholder KUD Makarti Sawit, 14 Smallholders of KUD Bhirawa Bhakti and 14 smallholders at KUD Mitra Usaha) during field visits, farmers generally knew about the Cooperative's policy on discrimination, and they were even able to provide examples that in recruiting harvesters on their plots, they did not consider religion, ethnicity, social class, etc. | |
| 6.1.2 | (C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against. Evidence includes migrant workers non-payment of recruitment fees. - Critical (Major) compliance - | Based on a review of worker list documents and interviews with samples of workers in the field, gender committees and also trade unions, there are no discriminatory practices in operations at PT IIS Buatan II POM. For example, in terms of job placement, type of work and during recruitment there are no fees. recruitment applied to prospective workers. | Complied |
| | | Based on interviews with outsourced workers - PT Permata Indo Sejahtera (sortation work at Buatan II POM), they stated that during their work there was no treatment from PT IIS-Buatan II POM that led to discrimination. | |
| 6.1.3 | The unit of certification demonstrates that the recruitment selection, hiring access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available. - Minor compliance - | Until the surveillance2.3 audit, there have been no changes related to the processing SOP recruitment and employee selection No. SOP: AA-HR-305.2-R0 dated 1 February 2009 regarding "penerimaan karyawan baru" (recruitment and selection of employee), explained that: When candidates have passed in the process of selection, next recruitment sends the candidate in full data system averis into HR-it) to be made an agreement work (made 2 duplicate and should be sign by candidates in question. | Complied |

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| PT Inti Indosawit Subur – Buatan II POM and Estate has issued the specific labour policy and procedures for temporary workers (PHL/PKWT); |
|---|
| In the recruitment process, the company has set the standard of competence that inferred in the Position Description and Job Profile. Recruitment selection, hiring and promotion has based on skills, capabilities, qualities, and medical fitness. |
| Taken as an example of the recruitment process at Buatan II POM on behalf of prospective worker Victor Daniel M. in September 2023, several required documents are in accordance with the recruitment procedure, including: |
| Candidate employee data form in the name of Victor Daniel M Copy of KTP/ID in the name of Victor Daniel M Copy of Family Card in the name of Victor Daniel M Basic physical and health examination by the Asian Agri Healthy Buatan Clinic on 21 September 2023 Memorandum from Mill Manager Buatan II POM no. 248/MI- PBS/MEMO/IX/2023 dated 30 September 2023 concerning the Acceptance and Appointment of Non-Staff Workers (PHL). |
| Recruitment at Simpang Perak Estate, there were 5 of prospective workers in February 2024, as follow: - Pruning worke: as much as 1 worker - FFB Loader as much as 1 worker - Harveser as much as 3 harvester |
| several required documents are in accordance with the recruitment procedure, including: - Candidate employee data form on behalf of 5 prospective workers |

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| | | Copy of KTP/ID in the name of 5 prospective workers Copy of Family Card in the name of 5 prospective workers Basic physical and health examination by the Asian Agri Healthy Buatan Clinic on 15 February 2024 on behalf of 5 prospective workers Memorandum from Mill Manager Buatan II POM no. 31/ES- KSP/MEMO/02/2024 dated 20 February 2024 concerning the Acceptance and Appointment of Non-Staff Workers. | |
|-------|--|--|----------|
| | | Based on interviews with sample workers, they were recruited based on their skills, abilities and also based on health checks to see whether or not the workers were fit to do the work according to its type. Meanwhile, for worker promotion, the company has carried out an evaluation of workers (parameters: discipline, productivity and ability to work), examples of recruitment and promotion can be seen in 3.5.2 above. | |
| | | Procedures, recruitment records and employee promotion documents are available and verifiable at the time of the audit. | |
| | | The company has also created a training program carried out by HRD and access to worker training is based on needs and type of work in order to improve abilities, productivity and better skills. The training plan program for the 2024 has shown during audit. | |
| | | Based on interviews with a sample of workers and union leaders, that workers have received access to training in accordance with the annual training program. | |
| 6.1.4 | Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women. - Minor compliance - | PT IIS- Simpang Perak has a monthly pregnancy checking program for female workers, especially workers who deal with chemicals (fertilizing and spraying). So checking female workers for pregnancy is not a form of discrimination, but is to find out the condition of female workers' pregnancies as a consideration for implementing company policy that | Complied |

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| | | pregnant female workers do not do work related to chemicals and will then be transferred to other non-chemical jobs. | |
|-------|---|--|----------|
| | | Verification of pregnancy checks on 13 February 2024 for 8 female workers by Klinik Asian Agri Sehat Buatan. The 8 female workers are: Ris****, Lam***, Sal****, Lis***, Sur****, Rus**** and Hel***, More***, and the result of pregnancy test was negative pregnancy. | |
| 6.1.5 | (C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women. Critical (Major) compliance - | PT IIS Buatan Plantation has established a gender committee chaired by Silvia Junita Harefa based on the Decree from the Manager of Buatan I and Simpang Perak Estate No. 001/ES-KBN/EXT/02/2023 dated 2 January 2023 concerning the Determination of the Structure of the Gender Committee in the Buatan Group Plantation Work Area. With regional administrators: Armainah (in the region Echo 1) Herlina Sari (in the region Echo 2) Arnita Irawati (in the region Echo 3) Gender Committee of PT IIS-Buatan Group Plantation has stablished the Activities Program in 2024 period, such as: The provision of extra pudding for children in the Daycare has been realizied in Thursday every month. Children's growth and development in the Child Care Center, | Complied |
| | | carried out every month in the first week. | |
| | | Cleanliness of the environment around housing and Child Care Centers. | |
| | | Socialization of the dangers of pesticides for breastfeeding mothers, has been carried out on 02/15/2024, 03/21/2024, 04/25/2024, 05/16/2024 and on 06/11/2024. | |

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| | | | 1 |
|-------|---|--|----------|
| | | Socialization and inspection of child care, has been realized on May 17, 2024 | |
| | | 6. Socialization to new mothers and related to acts of harassment and violence against women. | |
| | | Based on an interview with the Chairman of the Gender Committee Ms. Silvia Junita Harefa, there was a case of infidelity among workers on 15 June 2024. This case has been well documented by the Gender Committee. Some of the actions that have been taken are making a case report made by the Chairman of the Gender Committee, known by the field assistant (Afd. 3) and verified by the Public Relations Officer and the manager of the Buatan I and Simpang Perak Estate. An investigation has been carried out on this cases until mediation is carried out to complete it and an action plan is determined so that it does not recur (rehabilitation) i.e.: both parties agree not to reside in the company's housing and the separation of work units. | |
| 6.1.6 | There is evidence of equal pay for the same work scope. - Minor compliance - | PT IIS-Buatan Group has set wages based on the minimum wage set by the Governor of Riau in 2024. Based on the Decree of the Governor of Riau No. Kpts.7618/XI/2023 dated 30 November 2023 concerning the Regency/City Minimum Wage in Riau Province in 2024 amounting to IDR 3,395,359 per month. The Company through the Estate Manager of Simpang Perak Estate has also issued Memorandum No. 498/ES-KSP/MEMO/09/2023 dated 25 Sontember 2023 concerning the Determination of Manual Promiums | Complied |
| | | September 2023 concerning the Determination of Manual Premiums. Further, PT IIS Buatan Palntation has been issued the Memorandum form Regional Head Plt. 2 No. 001/HR-RO2/MEMO/01/2024 dated 2 January 2024 regarding Wages of Worker with the Grade of PHL, SKUH and SKUB in 2024 period, described: | |

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| | | Wages of PHL amount IDR 3,395.359 per month or IDR 135.814 per day. Wages of SKUH amount IDR 3,395,359 per month. The wage of SKUB is in accordance with the wage scale structure adjusted in the 2024 wage table. Natura - Rice allowance in the form of rice in accordance with the provisions of the Collective Labor Agreement (PKB) for SKUH and SKUB workers | |
|-------|--|---|----------------|
| | | Simpang Perak Estate has also issued the P2 Harvest Basic Premium Provisions, regarding the determination of the harvest wholesale basis based on the Average Bunch Weight (<i>BJR: Berat Janjang Rata-rata</i>), area conditions/topography: undulating and hilly and mountainous. | |
| | | Based on document reviews and interviews with sample workers during field visits, the determination of the minimum wage in 2024 and the determination of premiums for workers are in accordance with the current conditions and work performance of workers. | |
| | 6.2: Pay and conditions for staff and workers and for contract workers alway ges (DLW). | | provide decent |
| 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 - | PT IIS-Buatan Group has set wages based on the minimum wage set by the Governor of Riau in 2024. Based on the Decree of the Governor of Riau No. Kpts.7618/XI/2023 dated 30 November 2023 concerning the Regency/City Minimum Wage in Riau Province in 2024 amounting to IDR 3,395,359 per month. | Complied |
| | | Based on the location of the PT IIS Buatan I & II plantation (HGU owned) there are 2 areas/regencies, namely Pelalawan Regency covering an area of 4,402.6689 Ha (77.4%) and Siak Regency covering | |

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| an area of 1,287.4025 Ha (22.6%). The head office of the Buatan plantation is in Pelalawan Regency. | |
|--|--|
| Although the location of Buatan Group Plantation is in 2 regencies, Siak and Pelalawan, the legal basis (regulations and legislation: UU Cipta Kerja No. 11/2020 and PP no. 36 of 2021). For this condition, there is not clearly regulated in regulations and legislation. Even the audit team has consulted with the Pelalawan Regency Manpower Office, but they explained that it was not clearly stated in existing laws and regulations. | |
| Most of the workers at Buatan Group are workers from the community around Pelalawan Regency who have ID cards from Pelalawan Regency. | |
| So that in determining workers' wages, the Decree of the Governor of Riau No. Kpts.7618/XI/2023 dated 30 November 2023 concerning the Minimum Wage for Regency/City in Riau Province in 2024 is IDR 3,395,359 per month for Pelalawan Regency. | |
| Further, PT IIS Buatan Plantation has been issued the Memorandum form Regional Head Plt. 2 No. 001/HR-RO2/MEMO/01/2024 dated 2 January 2024 regarding Wages of Worker with the Grade of PHL, SKUH and SKUB in 2024 period, described: | |
| 1. Wages of PHL amount IDR 3,395.359 per month or IDR 135.814 per day. | |
| 2. Wages of SKUH amount IDR 3,395,359 per month. | |
| 3. The wage of SKUB is in accordance with the wage scale structure adjusted in the 2024 wage table. | |
| Natura - Rice allowance in the form of rice in accordance with the provisions of the Collective Labor Agreement (PKB) for SKUH and SKUB workers | |
| Determination of wages as per Memorandum dated 2 January 2024 is available in bahasa so that all workers can understood. This Memorandum of determination of wages is in accordance with the | |

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| labour law UU No. 11/2020 Cipta Kerja and peraturan Pemerintah No. 36/2021 regarding Pengupahan- Wages in 2024 period. | |
|--|--|
| Scheme smallholder: | |
| The determination of wages for workers in Plasma Buatan is based on the Decree of the Governor of Riau No. Kpts.7618/XI/2023 dated 30 November 2023 concerning the Regency/City Minimum Wage in Riau Province in 2024 amounting to IDR 3,395,359 per month. | |
| The Cooperative/KUD aslo have working agreement letter - " <i>Surat</i> <i>Perjanjian Kerjasama</i> " with the workers, i.e: Working Agreement Letter on behalf of Mr. Darmasnio (as Harvester) at KUD Tani Rukun dated 12 January 2023, on behalf of Mr. Arif at KUD Bhirawa Bhakti date 10 January 2023. | |
| Based on interviews with smallholder samples (55 smallholder samples) during field visits, the following information was obtained regarding the amount of workers' wages: | |
| Determining of wages, state on Article 2; Upah Atau Imbalan: The Wages/benefits is given monthly are calculated based on Rp/kg of FFB harvested per rotation, amounting to IDR 150-180 per kg of FFB, working for 5-6 hours per day (starting at 07.00 - 14.00). Based on interviews with several permanent residents in the Smallholder area, the average daily gain is 2.5 to 3 tons and this is still above the establishment of the district minimum wage. | |
| Determination of wages for fertilizer application: with working hours of 4-5 hours per day with an average amount of fertilizer per day of 10 sacks. The work agreement is stipulated at IDR 250 per Kg of fertilizer, except for Borate fertilizer at IDR 15,000 per sack. This contitions is still above the establishment of the district minimum wage | |

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| | | Spraying work was carried out by the TUS Team (Spray Unit Team) from Simfpang Perak Estate (nucleus). | |
|-------|--|--|----------|
| 6.2.2 | (C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed. Critical (Major) compliance - | Buatan II POM and Simpang Perak Estate: PT IIS – Simpang Perak Estate and Buatan II POM in its operations uses 3 types of workers, namely: Permanent workers (SKUH and SKUB), Casual daily workers (PHL) and outsourcing for Sorting work at Buatan II POM. Each type of worker has an Employment Agreement: SKUH and SKUB use the Joint Work Agreement of BKS PPS (<i>Badan Kerja Sama Perusahaan Perkebunan Sumatera</i>) for the period 2022 - 2024. Casual Daily Worker (PHL) uses a Daily Work Agreement, verification is carried out on the Daily Work Agreement No. 13148 / PKH / KBN / 03/2022 dated March 18, 2022 in the name of Jepen Sumantri Panjaitan (Upkeep) <i>Perjanjian Kerja Harian</i> - Daily Work Agreement No. 11009 / PKH / KBN / 02/2014 dated February 03, 2014 in the name of Sukari (Upkeep) <i>Perjanjian Kerja Harian</i> - Daily Work Agreement No. 11448 / PKH / KBN / 12/2014 dated December 1, 2014 in the name of Muhammad Fikri Rahmadan (Upkeep) Outsourcing workers as many as 7 people as sorting workers in Buatan II POM as 9 months from the Outsourcing Labor Provider Service on behalf of PT Permata Indo Sejahtera. Based on the work agreement above, the company has set a working time of 7 hours a day and 40 hours a week for 6 working days (Monday-Saturday). Determination of overtime work hours and overtime wages using the calculation formula: [Monthly wage + Monthly rice allowance value for workers]: 173 | Complied |

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| The company will issue pay slips to all its employees containing: details of payment and conditions of employment on the working agreement documents are determined, such as: regular working hours or working days, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, notice periods, etc. and in accordance with national legal requirements (UU cipta Kerja No. 11/2020, PP No. 36 tahun 2021 regarding Wages). Based on intreview with sample of workers during audit, that several workers has duplicate of Contract of Employee. PT IIS -Buatan II POM and Simpang Perak Estate also provides pay slips and payroll documents to each worker in accurate information on compensation and presented in Bahasa so that it is easier to understand. Verified for pay slip sample period June 2024: On behalf Sukari – 11009, daily worker as nursery worker, working days 18, basic salary IDR 2,444,658, premium IDR 471,628, sub total IDR 2,916,286, deduction BPJS IDR 101,861, net salary IDR 2,814,425. On behalf Japen S.P – 13148, daily worker as nursery worker, working 603,256, sub total IDR 3,217,682. On behalf IR intri – 11448, daily worker as nursery worker, working days 20, basic salary IDR 2,716,287, premium IDR 603,256, sub total IDR 3,217,682. On behalf Takin – 1108, daily worker as nursery worker, working days 20, basic salary IDR 2,716,287, premium IDR 603,256, sub total IDR 3,217,682. | | | |
|---|--|---|--|
| Verified for pay slip sample period June 2024: On behalf Sukari – 11009, daily worker as nursery worker, working days 18, basic salary IDR 2,444,658, premium IDR 471,628, sub total IDR 2,916,286, deduction BPJS IDR 101,861, net salary IDR 2,814,425. On behalf Japen S.P – 13148, daily worker as nursery worker, working days 20, basic salary IDR 2,716,287, premium IDR 603,256, sub total IDR 3,319,543, deduction BPJS IDR 101,861, net salary IDR 3,217,682. On behalf M Fikri – 11448, daily worker as nursery worker, working days 20, basic salary IDR 2,716,287, premium IDR 1,250,698, sub total IDR 3,966,985, deduction BPJS IDR 101,861, net salary IDR 3,966,985, deduction BPJS IDR 101,861, net salary IDR | | of payment and conditions of employment on the working agreement documents are determined, such as: regular working hours or working days, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, notice periods, etc. and in accordance with national legal requirements (UU cipta Kerja No. 11/2020, PP No. 36 tahun 2021 regarding Wages). Based on intreview with sample of workers during audit, that several workers has duplicate of Contract of Employee. PT IIS -Buatan II POM and Simpang Perak Estate also provides pay slips and payroll documents to each worker in accurate information on | |
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| working days 20, basic salary IDR 2,716,287, premium IDR 603,256, sub total IDR 3,319,543, deduction BPJS IDR 101,861, net salary IDR 3,217,682. On behalf M Fikri – 11448, daily worker as nursery worker, working days 20, basic salary IDR 2,716,287, premium IDR 1,250,698, sub total IDR 3,966,985, deduction BPJS IDR 101,861, net salary IDR | | On behalf Sukari – 11009, daily worker as nursery worker, working days 18, basic salary IDR 2,444,658, premium IDR 471,628, sub total IDR 2,916,286, deduction BPJS IDR 101,861, net salary IDR | |
| days 20, basic salary IDR 2,716,287, premium IDR 1,250,698, sub total IDR 3,966,985, deduction BPJS IDR 101,861, net salary IDR | | working days 20, basic salary IDR 2,716,287, premium IDR 603,256, sub total IDR 3,319,543, deduction BPJS IDR 101,861, | |
| | | days 20, basic salary IDR 2,716,287, premium IDR 1,250,698, sub | |
| Based on document reviews and interviews with worker samples, PT IIS -Buatan II has implemented wages in accordance with applicable rules and regulations. Each workers has duplicate of Worker agreement | | -Buatan II has implemented wages in accordance with applicable rules | |

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| document in accordance with the labour law UU No. 13 Year 2003 regarding employment. | |
|--|--|
| Scheme samllholder: | |
| The determination of wages for workers in Plasma Buatan I and Buatan II is based on the Decree of the Governor of Riau No. Kpts.7618/XI/2023 dated 30 November 2023 concerning the Regency/City Minimum Wage in Riau Province in 2024 amounting to IDR 3,395,359 per month. | |
| Based on interviews with smallholder samples (55 smallholder samples) during field visits, the following information was obtained regarding the amount of workers' wages: | |
| Determining of wages, state on Article 2; Upah Atau Imbalan: The Wages/benefits is given monthly are calculated based on Rp/kg of FFB harvested per rotation, amounting to IDR 150-180 per kg of FFB, working for 5-6 hours per day (starting at 07.00 - 14.00). Based on interviews with several permanent residents in the Smallholder area, the average daily gain is 2.5 to 3 tons and this is still above the establishment of the district minimum wage. | |
| Determination of wages for fertilizer application: with working hours of 4-5 hours per day with an average amount of fertilizer per day of 10 sacks. The work agreement is stipulated at IDR 250 per Kg of fertilizer, except for Borate fertilizer at IDR 15,000 per sack. This contitions is still above the establishment of the district minimum wage | |
| - Spraying work was carried out by the TUS Team (Spray Unit Team) from Simfpang Perak Estate (nucleus). | |
| The Cooperative/KUD aslo have working agreement letter - "Surat Perjanjian Kerjasama" with the workers, i.e: Working Agreement Letter | |

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| | | on behalf of Mr. Arif (as Harvester) at KUD Bhirawa Bhakti dated 12 January 2023, on behalf of Mr. Dasmanio at KUD Tani Rukun date 10 January 2023. | |
|-------|---|--|--------------------|
| | | In this surveillance audit, verification was carried out on the salary payment forms for workers as follows: | |
| | | Harvesters on behalf of Arif for the harvest on KUD Bhirawa Bhakti field on period Juni 2024, for harvesting FFB: 3 rotation : 3,350 kg FFB with wages of IDR 200 per kg, total wages of IDR 670,000. | |
| | | Harvesters on behalf of Darmasnio for the harvest on KUD Tani Rukun field period June 2024, for harvesting FFB: 3 rotation : 3,550 kg FFB with wages of IDR 200 per kg, total wages of IDR 710,000. Fertiizing of ZA on behalf of Darmasnio on KUD Tani Rukun at plots own by Pak Agus on Jne 2024 fertilizer as much as 8 sack (wage | |
| | | @ IDR 15,000), net wage as IDR 120,000. | |
| | | Based on the verification of the harvester wage payment form above, KUD/Koperasi Plasma Buatan II has implemented wages in accordance with applicable regulations and laws. | |
| 6.2.3 | (C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, and other legal labour requirements. Critical (Major) compliance - | PT IIS-Buatan II Plantation together with the PUK SPPP SPSI Workers Union have made a joint work agreement in the form of a Joint Work Agreement for the period 2022-2024. The Work Agreement contains provisions related to employment such as: regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and others in accordance with applicable laws. | Non- compliance |
| | | Statements about wages, stated in PKB in Article V concerning Wages- Upah; stated: "Pekerja harian Tetap dan Pekerja Bulanan diberi upah berupa uang yang ditetapkan berdasarkan kesepakatan bersama dengan BKS-PPS dengan PD.FSP.PP-SPSI Propinsi yang bersangkutan | |

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| sesuai dengan peraturan perundangan Otonomi Daerah yang berlaku, yaitu upah uang ditambah beras pekerja senilai/sejumlah 15 Kg (Upah BKS-PPS), dengan mengingat situasi ekonomi dan kemampuan perusahaan". |
|---|
| This rice allowance is also given to the wife as much as 9 kg and each child 7.5 kg (maximum child support is 3 children) |
| Determination of wages (including benefits and other benefit/ premium), working hours (including hours and overtime pay) and working days have been regulated in the PKB Period 2022-2024 in Article V; <i>Upah</i> - Wages, which explains: |
| Permanent workers are given wages, the value of which is determined by the employer on the condition that it is not lower than government regulations. |
| b) Certain permanent workers are given wages (Basic Salary and Rice) in accordance with the status of the group/level whose value is determined by the employer with provisions not lower than government regulations |
| c) Permanent workers receive additional wages (UMP/UMSK) and / or attendance incentives as stipulated further in separate provisions. |
| Article IV: (Working hours are 7 hours a day and 40 hours a week for 6 working days a week (Monday-Saturday). |
| Provisions on holidays and leave (both maternity leave and menstruation leave) have been regulated in Article VIII regarding Non-working Days; including: absenteeism, rest days of the week, official holidays, annual leave, maternity leave and others. |
| The certification holder has made a salary slip for his employees, which is explained in detail, including: basic wages, fixed and premium |

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| (harvest and non-harvest) allowances, overtime pay, health and retirement benefits, and deductions that include contributions of labor security and health insurance (BPJS Ketenagakerjaan and BPJS Kesehatan). | |
|--|--|
| Documents verified: | |
| 1. Analysis of employee absences in January - June 2024. | |
| 2. Payslip of employee on May-June 2024 period (see 6.2.1) | |
| 3. <i>Surat Perintah Lembur (SPL)</i> – Over time order for example: | |
| • SPL on 2 March 2024 on behalf of Sri Wandani (PMKS Buatan II) for sortation work in PBD for 1.5 hours. | |
| SPL on 17 Feburary 2024 on behalf of Ponirin (PMKS Buatan II) for Sortation in PBD for 3 hours. | |
| Leave Application Letter on behalf of Nasikun (Simpang Perak Estate as harvest), for annual leave taken on 22–24 May 2024 (within 3 days) of the right to leave for 12 days. (has been in accordance with applicable laws and regulations). | |
| Based on the sample pay slip above, that Simpang Perak Estate and Buatan II Mill have applied the wages of their employees in line with Law Number 6 of 2023 (Perpu UU Cipta kerja) concerning Employment and PP no. 36/2021 regarding Remuneration. However, based on the payroll/wage checkroll, it was identified that there were PHL workers who had not been registered as Pension Insurance participants, which is the company's obligation in accordance with PP No. 45/2015 concerning the Implementation of Pension Insurance. | |
| Auditor has also carried out interview with the Head of the Workers' Union, there was a case of termination of employment of 7 Sorting workers at Buatan II POM due to a violation of company policy, namely accepting bribes from TBS suppliers to grade TBS at the sorting location. | |

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| Based on PP No. 35/2021, this violation is included in the category of "Urgent Violations - Pelangaran Bersitat Mendesak", namely: "providing false or falsified information that is detrimental to the company". So based on this Regulation, the Company can carry out direct PHK (<i>Pemutusan Hubungan Kerja</i> - Termination of Employment) and workers get the rights: - Replacement money according to Article 40 paragraph (4) of PP 35/2021; and - Ulang Pisah - Separation money, the amount of which is regulated in the work agreement, PP, or PKB. This has also been explained in the PKB (2022-2024 period) in Article XXI; Separation Money. Based on this, PT IIS - Buatan II POM has issued a Letter of Termination of Employment as of September 19, 2023 and all workers' rights have been given in the form of severance pay in accordance with applicable Regulations and the PKB that has been agreed on September 27, 2023 and a Seceipt of severance pay and a Joint Agreement for receipt of severace pay have been made which were also witherseed by the Head of the Workers' Union. The Auditor has also verified the Proof of Transfer through Bank BRI Unit Kerinci for the payment of the Ulang Pisah. Non conformance: There are determinations related to employment that are not in accordance with applicable regulations and legislation Objective Evidence Dispective Evidence | |
|--|---|
| (<i>Pemutusan Hubungan Kerja</i> - Termination of Employment) and workers get the rights: Replacement money according to Article 40 paragraph (4) of PP 35/2021; and <i>Uang Pisah</i> - Separation money, the amount of which is regulated in the work agreement, PP, or PKB. This has also been explained in the PKB (2022-2024 period) in Article XXI; Separation Money. Based on this, PT IIS – Buatan II POM has issued a Letter of Termination of Employment as of September 19, 2023 and all workers' rights have been given in the form of severance pay in accordance with applicable Regulations and the PKB that has been agreed on September 27, 2023 and a Receipt of severance pay and a Joint Agreement for receipt of severance pay have been made which were also witnessed by the Head of the Workers' Union. The Auditor has also verified the Proof of Transfer through Bank BRI Unit Kerinci for the payment of the <i>Uang Pisah</i>. Non conformance: There are determinations related to employment that are not in accordance with applicable regulations and legislation | "Urgent Violations - <i>Pelanggaran Bersifat Mendesak</i> ", namely: "providing false or falsified information that is detrimental to the |
| 35/2021; and Uang Pisah - Separation money, the amount of which is regulated in the work agreement, PP, or PKB. This has also been explained in the PKB (2022-2024 period) in Article XXI; Separation Money. Based on this, PT IIS - Buatan II POM has issued a Letter of Termination of Employment as of September 19, 2023 and all workers' rights have been given in the form of severance pay in accordance with applicable Regulations and the PKB that has been agreed on September 27, 2023 and a Receipt of severance pay have been made which were also withressed by the Head of the Workers' Union. The Auditor has also verified the Proof of Transfer through Bank BRI Unit Kerinci for the payment of the Uang Pisah. Non conformance: There are determinations related to employment that are not in accordance with applicable regulations and legislation | (Pemutusan Hubungan Kerja - Termination of Employment) and workers |
| in the work agreement, PP, or PKB. This has also been explained in the PKB (2022-2024 period) in Article XXI; Separation Money. Based on this, PT IIS – Buatan II POM has issued a Letter of Termination of Employment as of September 19, 2023 and all workers' rights have been given in the form of severance pay in accordance with applicable Regulations and the PKB that has been agreed on September 27, 2023 and a Receipt of severance pay and a Joint Agreement for receipt of severance pay have been made which were also witnessed by the Head of the Workers' Union. The Auditor has also verified the Proof of Transfer through Bank BRI Unit Kerinci for the payment of the <i>Uang Pisah</i> . Non conformance: There are determinations related to employment that are not in accordance with applicable regulations and legislation | |
| XXI; Separation Money. Based on this, PT IIS – Buatan II POM has issued a Letter of Termination of Employment as of September 19, 2023 and all workers' rights have been given in the form of severance pay in accordance with applicable Regulations and the PKB that has been agreed on September 27, 2023 and a Receipt of severance pay and a Joint Agreement for receipt of severance pay have been made which were also witnessed by the Head of the Workers' Union. The Auditor has also verified the Proof of Transfer through Bank BRI Unit Kerinci for the payment of the <i>Uang Pisah</i>. Non conformance: There are determinations related to employment that are not in accordance with applicable regulations and legislation | |
| of Employment as of September 19, 2023 and all workers' rights have been given in the form of severance pay in accordance with applicable Regulations and the PKB that has been agreed on September 27, 2023 and a Receipt of severance pay and a Joint Agreement for receipt of severance pay have been made which were also witnessed by the Head of the Workers' Union. The Auditor has also verified the Proof of Transfer through Bank BRI Unit Kerinci for the payment of the <i>Uang Pisah</i> . Non conformance: There are determinations related to employment that are not in accordance with applicable regulations and legislation | |
| There are determinations related to employment that are not in accordance with applicable regulations and legislation | of Employment as of September 19, 2023 and all workers' rights have been given in the form of severance pay in accordance with applicable Regulations and the PKB that has been agreed on September 27, 2023 and a Receipt of severance pay and a Joint Agreement for receipt of severance pay have been made which were also witnessed by the Head of the Workers' Union. The Auditor has also verified the Proof of Transfer |
| accordance with applicable regulations and legislation | |
| Objective Evidence | |
| | Objective Evidence |

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| Based on the results of interviews with outsourcing workers (6 sorting workers) at Buatan II POM, it is known that for outsourcing workers specifically for Shift 2, the working hours are from 12.00 – 20.00 (7 hours of work + 1 hour of overtime), however in intervals this time does not regulate rest hours, this is not in accordance with UU No.13/2003 Pasal 79. Based on document review of Memorandum No. 498/ES-KSP/MEMO/09/2023 dated 25 September 2023 concerning Manual Premium Memorandum (A107 and A85) that there are premium determinations that do not refer to applicable regulations/CLA, namely: No. 20. HK PHL Premium: IDR 131,505 per working hours (PHL employees who have more than 20 working hours. |
|---|
| Furthermore, according to the Decree of the Minister of Manpower and Transmigration, No. KEP. 102/MEN/VI/2004 Article 1 Paragraph 1, what is meant by overtime work is working hours that exceed 7 hours a day and 40 hours a week on normal working days, or work carried out on weekly holidays and on official holidays that have been determined by the government. PP 35/2021 Article 31 regulates the calculation of wages for overtime work, but the memorandum states: No. 28. Afternoon Work: IDR 10,000 Per Hour (work from 14.00 to 18.00). No. 25 LA Streaming Premium: IDR 10,000 per hour after 14.00 WIB (working hours) And then, according to the regulations of PP 36/2021 Article 39 "Overtime wages must be paid by companies that employ workers over working time on weekly breaks or on official holidays, but in the memorandum it is stated: |

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| | | No. 39. Load TBS; Sundays/Holidays 131,505 per HK and 109,587 per HK. Based on the payroll/wage list of Simpang Perak Estate workers for the period January – June 2024, it was known that there are Daily Worker/PHL workers who have not been registered as Pension Guarantee participants, namely out of 20 samples of Daily Wokers workers, it was verified that 15 workers have not registered for Pension Guarantee. This is not in accordance with PP No. 45/2015 concerning the Implementation of Pension Security. | |
|-------|---|--|----------|
| 6.2.4 | (C) The unit of certification provides adequate housing. Sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure. - Critical (Major) compliance - | There are no changes related to the facilities provided by the company for workers, namely related to employee housing, public facilities and infrastructure and the provision of electricity and water. Buatan II POM has prepared facilities for their workers, such as: Housing Mess (1 unit), type B (4 units), Type D (17 units), Type D1 (20 units), Type D2 (24 units), Type E (486 units), Policlinic (2 units), Mosque (2 units), Church (1 unit), Sport facilities, school bus (5 units), Electricity, water supply, etc. Simpang Perak Estate has prepared facilities for their workers, such as: Housing complex (399 units) Elementary (1 unit) and kindergarden (1 units) Policlinic (1 unit) | Complied |

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| | | - Mosque (2 units) | |
|-------|---|--|----------|
| | | - Church (1 unit) | |
| | | - School bus (2 units) | |
| | | - Ambulance (1 unit) | |
| | | - Sport facilities | |
| | | - Etc. | |
| | | | |
| | | PT IIS - Buatan II Plantation performed regular water quality test, whereby the source from worker housing's well, the latest test conducted on November 2023. | |
| | | The Company also has a yearly Budget for employee housing improvements, based on the 2024 employee home improvement budget. The budget has been distributed based on cash flow / detailing every month for a year. The realization of repairs/maintenance of workers' housing has reached 100% of the budget until 2024 as of June 25, 2024. The type of housing that has been renovated for type C 3 unit and type E housing 10 couple. | |
| | | The provision of electricity for employee housing is provided by using electricity connections from the government (PLN - Perusahaan Listrik Negara) with a subsidy from the company of IDR 50,000 per month per housing unit. | |
| | | Based on field visits to workers' housing (emplasmen) and interviews with workers' associations, it is clear that currently there is still housing that is time to be renovated/repaired | |
| 6.2.5 | The unit of certification makes efforts to improve workers' access to | Buatan II POM and Simpang Perak Estate: | Complied |
| | adequate, sufficient and affordable food. | Within the company area there are minimarkets managed by employee | |
| | - Minor compliance - | cooperatives and traditional markets located around the company area, | |
| | | most of the goods employees need are provided by minimarkets. Prices | |

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| | | at minimarkets are affordable and cheaper than traditional markets | |
|-------|---|---|----------|
| | | around the company location. Price control is carried out by the cooperative and all members, including workers and company administrators. So, access to the food needs of PT IIS-Buatan Group employees is not a problem. | |
| | | Auditor has carried out interview to the workers during field visit at ASA2.3 at harvesting activity, fertilizing activity and spraying activity, it was known that there is no issue for workers' access to adequate, sufficient and affordable food. | |
| | | Scheme smallholder: | |
| | | There is a market in the village where small workers live. Road access and availability of food and other basic necessities are easy to find at competitive/affordable prices. Prices are determined by the market and controlled by the government. | |
| 6.2.6 | A DLW is paid to all workers in accordance with applicable regulations, | Buatan II Estate, POM and Scheme Smallholder: | Complied |
| | 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 - | PT IIS-Buatan Group has set wages based on the minimum wage set by the Governor of Riau in 2024. Based on the Decree of the Governor of Riau No. Kpts.7618/XI/2023 dated 30 November 2023 concerning the Regency/City Minimum Wage in Riau Province in 2024 amounting to IDR 3,395,359 per month. | |
| | | Based on verification of wage documents and sample salary slips at the time this audit was carried out, PT IIS - Buatan Group has set wage standards based on wages set by the Riau Provincial government for the period 2024. The company also provides scripts/salary slips to employees before salaries are given, salary slips also includes basic salary, allowances, premiums, worker health insurance (BPJS Employment and Health) and deductions. | |
| | | The company also made calculations related to DLW on period 2024, based on the wages given to employees as costs given by the company. | |

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| | | shows that total cost and kind benefit for average is IDR 687,991; average monthly take home salary per worker is IDR 3,566,872 and total value of prevailing wage is IDR 4,254,864. | | |
|--------------------|---|---|----------------|--|
| PROCED | URAL NOTE: | | | |
| |) has published guidelines on the calculation of Decent Living Wage (DLW) uct a DLW benchmark study in accordance with the Global Living Wage Coal | | PO Secretariat | |
| Novembe 1. Payr | 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 | | | |
| | Assessment of wages paid (prevailing wages) and in-kind benefits. Once the DLW benchmark is available, this procedural note is no longer applicable. | | | |
| 6.2.7 | Permanent fulltime employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal. - Minor compliance - | Buatan II POM and Simpang Perak Estate: PT IIS – Buatan II POM in its operations uses 3 types of workers, namely: Permanent workers (SKUH and SKUB), Casual daily workers (PHL) and outsourcing for Sorting work at Buatan II POM. Each type of worker has an Employment Agreement: 1. SKUH and SKUB use the Joint Work Agreement of BKS PPS (<i>Badan Kerja Sama Perusahaan Perkebunan Sumatera</i>) for the period 2022 - 2024. 2. Casual Daily Worker (PHL) uses a Daily Work Agreement, verification is carried out on the Daily Work Agreement: <i>Perjanjian Kerja Harian</i> - Daily Work Agreement No. 017/PKHL/KSP/VI/2021 dated 07 June 2021 in the name of Sutanti (Upkeep) at Simpang Perak Estate <i>Perjanjian Kerja Harian</i> - Daily Work Agreement No. 036/PKHL/KSP/VI/2021 dated 15 June 2021 in the name of Ardin Zendato (Upkeep) at Simpang Perak Estate | Complied | |

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| 3. Outsourcing workers as many as 2 people as sorting workers in Buatan II POM as of 3 July 2024 from the Outsourcing Labor Provider Service on behalf of PT Permata Indo Sejahtera. | |
|--|--|
| The main work (core work) is carried out by permanent workers (SKUH and SKUB), although there are still harvesters whose main work is still carried out by non-permanent workers (PHL) where the harvesters were recruited a long time ago and the Company has created a promotion program for PHL harvesters to become permanent SKUH workers. This promotion program is carried out every semester each year, here is the realization of the permanent workers promotion program until June 2024: | |
| Simpang Perak Estate; There is 37 workers for period Y2023 and Y2024 related to promotion, for example: Hakim Rasyid AP as mechanic refers to Memorandum of HR No. 129/HR-RO2/MEMO/SK/06/2023 dated 30 June 2023; Sukron Sitanggang as harvester refers to Memorandum of HR No. 128/HR-RO2/MEMO/SK/06/2023 dated 30 June 2023; Peri Saputra as harvester refers to Memorandum of HR No. 126/HR-RO2/MEMO/SK/06/2023 dated 30 June 2023; Tono Manurung as FFB loader refers to Memorandum of HR No. 127/HR-RO2/MEMO/SK/06/2023 dated 30 June 2023; Kuswanto as harvester refers to Memorandum of HR No. 098/HR-RO2/MEMO/SK/01/2024 dated 1 January 2024; Budianto as harvester refers to Memorandum of HR No. 099/HR-RO2/MEMO/SK/01/2024 dated 1 January 2024; Faonasoki Waruwu as harvester refers to Memorandum of HR No. 100/HR-RO2/MEMO/SK/01/2024 dated 1 January 2024; | |
| - Buatan II POM: There is 12 workers for period Y2023 and Y2024 related to promotion, for example: Slamet Miswanto as Production Clerk refers to Memorandum of HR No. 009/M-I- | |

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| PBD/MEMO/SK/05/2023 dated 04 May 2023; Sitra Sejati as |
|---|
| personalia/HR refers to Memorandum of HR No. 009/M-I- |
| PBD/MEMO/SK/05/2023 dated 04 May 2023; Amrinto |
| Nainggolan as sample boy refers to Memorandum of HR No. |
| 051/M-I-PBD/MEMO/SK/05/2024 dated 14 May 2024; Lili Fadri |
| as mechanic refers to Memorandum of HR No. 051/M-I- |
| PBD/MEMO/SK/05/2024 dated 14 May 2024; Wilman Simanulang as operator refers to Memorandum of HR No. |
| 051/M-I-PBD/MEMO/SK/05/2024 dated 14 May 2024; Zidan |
| Ramdhani as operator refers to Memorandum of HR No. 051/M- |
| I-PBD/MEMO/SK/05/2024 dated 14 May 2024. |
| The company has committed that after May 2024 there will be no |
| recruitment of harvester workers with non-permanent worker status |
| (PHL/PKWT), and harvesters are recruited with SKUH (permanent) |
| status with a trial period of 3 months (in accordance with the UU Cipta |
| Kerja- Perpu No. 6 of 2023 and PP No. 35 of 2021). |
| Based on the verification of the list of workers as of June 2024 and |
| interviews with workers during field visits, there was no recruitment of |
| harvesters for Simpang Perak Estate and processing workers at Buatan |
| II POM who were recruited in May 2024 with PHL (Non-permanent) |
| status. |
| |
| Scheme samllholder: |
| The Cooperative/KUD aslo have working agreement letter - "Surat |
| Perjanjian Kerjasama" with the workers, i.e. Working Agreement Letter |
| on behalf of Mr. Arif (as Harvester) at KUD Bhirawa Bhakti dated 12 |
| January 2023, on behalf of Mr. Dasmanio at KUD Tani Rukun date 10 |
| January 2023. |

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| | | The type of workers in Plasma Buatan are non-formal workers in the form of casual daily workers who are recruited directly by farmers who own the plots. | |
|-------|---|---|----------|
| | 6.3: The unit of certification respects the rights of all personnel to form and ation and collective bargaining are restricted under law, the employer facil. | | |
| 6.3.1 | (C) A published statement recognizing freedom of association and right to collective bargaining in national languages is available and is explained to all workers in languages that they understand, and is demonstrably implemented. - Critical (Major) compliance - | Certificate holder had a policy concerning on the freedom of association stated in the freedom of association policy, dated 01 December 2019, this policy has been informed to all employees and being placed into public area easily accessed. The freedom to gather and form associations is listed in the Company Policy at point 16: "Perusahaan menghormati hak setiap karyawan untuk membentuk atau menjadi anggota serikat pekerja sesuai dengan keinginannya dan untuk melakukan tawar menawar secara kolektif.". It stated that the group respects workers' rights to freedom of association and association with other individuals and collectively expresses. The policy was published in Bahasa which can be understood by all employees. | Complied |
| | | As for Buatan Plasma, KUD also has a policy related to freedom of association which is contained in the CS Policy under " <i>Kebijakan Group Manager"</i> | |
| | | Based on the interviews with labor union representatives in each unit, it explained that the company had given freedom of association and labor unions have been formed. The establishment of the union was in accordance with the applicable laws and regulations and has been recorded in " <i>Dokumen Tanda Bukti Pencatatan PUK-SPPP SPSI PT.IIS PMKS – II Buatan</i> " dated 29 December 2011 by Labor and Transmigration Agency of Pelalawan Regency. | |

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| | | Based on the interviews with labor union members representatives, it's known that there was no force or pressure to be a member of labor union. The membership of labor union was voluntary. | |
|-------|--|--|----------|
| 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. - Minor compliance - | Certificate holder has documented the records of meetings between labor unions and management representatives. The following are examples of records of meetings conducted by labor unions in 2024, here as follows: The meeting between the labor union in all units and management representative on 20 June 2024 to discuss: The work program of the labor union includes: | Complied |
| | | 1. Revamping membership administration including recruitment of new members. | |
| | | 2. Improving the performance of the management | |
| | | 3. Improvement of the complaint system for problems | |
| | | 4. Refresh and review of PKB-BKSPPS | |
| | | Labor union and management meeting on 20 June 2024. | |
| | | 1. Preparation of a meeting plan between labor unions and management with the result that in 2024 a meeting will be held on 24 October 2024. | |
| | | 2. Preparation of a work program for the labor union management | |
| | | 3. Proposal of PUK SPSI related to members who are still PHL (casual worker). | |
| | | The recording of the activity was attended by the chairman and members of the trade union. | |
| | | Based on the interviews with labor union representatives and their members who work in each unit, it's known that the labor union held meetings whenever it's needed. The meetings accommodated in bipartite and internal meeting and there has been no labor issue that brought to Manpower Agency. | |

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| 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 - | Based on the interviews with the labor union representatives, there was no interference in the selection or labor union operational activities. All processes of selecting, decisions making and planning activities, members' aspirations to their representatives run democratically. The worker who is currently placed as the Chairman of the Labor Union in each unit is a worker in estate/mill, then there will be no conflict of interest that occurs with the company because there were no workers who have the authority as decision-makers (staff class and above). company also involved the labor union representative in drafted the | Complied |
|----------|---|--|----------|
| | | collective labor union. The establishment of the union was in accordance with the applicable laws and regulations and has been recorded at the Manpower Agency. Unit of certification was giving freedom for workers to express their aspirations and did not give any intervention related to labor union activity. Based on the interview with workers, it's known that there were no mandatory to be the member of labor union. The membership of labor union is voluntary. | |
| 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 - | Since the Company Policy was established in December 2019 until this surveillance 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. | Complied |

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| The company policy has been communicated to all employees of PT IntiIndosawit Subur – Buatan Group on 15 January 2024 (verified data: attendance list, socialization materials, documentation). Socialization to all stakeholders (including local contractors) was also carried out on 14 March 2024 which was attended by 15 stakeholders.Verification has also been carried out on the work contract documents with third parties and also the supplier contract documents including FFB 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. |
|---|
| |
| Scheme Smallholder: |
| Group Manager has set ICS Policy under "Group Manager Policy" signed by Buatan ICS Group Manager, for example: |
| - KUD Bhakti Mandiri (Scheme Smallholder) dated 20 December 2023, has been socialized to all smallholders on 20 December 2023. |
| - KUD Jaya Makmur (Scheme Smallholder) dated 08 August 2023, has been socialized to all smallholders on 08 August 2023 |
| - KUD Sumber Rejeki (Scheme Smallholder) dated 11 June 2024, has been socialized to all smallholders on 11 June 2024 |
| - KUD Sejahtera (Scheme Smallholder) dated 25 January 2024, has been socialized to all smallholders on 25 January 2024 |
| Group Manager has set ICS Policy under "Group Manager Policy" signed by Buatan II ICS Group Manager, for example: |
| - KUD Tani Rukun (Scheme Smallholder) dated 19 December 2023, has been socialized to all smallholders on 19 December 2023. |
| |

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| | | KUD Mitra Usaha (Scheme Smallholder) dated 20 Desember 2023, has been socialized to all smallholders on 20 Desember 2023 | |
|-------|---|--|----------|
| | | KUD Makarti Sawit (Scheme Smallholder) dated 13 December 2023, has been socialized to all smallholders on 13 December 2023. | |
| | | KUD Bhirawa Bhakti (Scheme Smallholder) dated 25 January 2024, has been socialized to all smallholders on 25 January 2024 | |
| | | In the Group Manager Policy, which is in point 10, it is stated: "It is prohibited to employ children under the age of 18 in any plantation operational activities". | |
| | | Based on interviews with samllholders sample (14 smallholders at KUD Tani Rukun, 13 samllholder KUD Makarti Sawit, 14 Smallholders of KUD Bhirawa Bhakti and 14 smallholders at KUD Mitra Usaha) during field visits, farmers have understood about child labor and stated that there are no workers (harvesting and fertilizing) under the age of 18. It was added that workers in Plasma Buatan II are on average 30-35 years old. | |
| 6.4.2 | (C) Documented evidence on the fulfilment of worker's minimum age requirements in accordance with applicable regulation and verification procedures for age requirements, are available. - Critical (Major) compliance - | Since the Company Policy was established in December 2019 until this surveillance 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. | Complied |

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| In att all | he company policy has been communicated to all employees of PT Intindosawit Subur – Buatan Group on 15 January 2024 (verified data: ttendance list, socialization materials, documentation). Socialization to I stakeholders (including local contractors) was also carried out on 14 arch 2024 which was attended by 15 stakeholders. |
|------------------|---|
| wi TE do | erification has also been carried out on the work contract documents ith third parties and also the supplier contract documents including BS suppliers. It is stated in writing in the article of the agreement ocument related to the prohibition of employing children (under the ge of 18), see 2.2.2 above. |
| of | ased on verification of the Employee Master document for the period f June 2024, the ages of the youngest workers were identified when ecruited, as follows: |
| | At Simpang Perak Estate; the youngest worker is Liusman Hura, born on 27/05/2003 and recruited on 23/02/2022 at the age of 18 years and 9 month. |
| | Di Buatan II POM; the youngest worker is Ari Aprianto, born on 03/08/2003 and recruited on 27/05/2022 at the age of 18 years and 9 month. |
| | ased on interviews with a sample of workers, they stated that up to ow, there are no workers under 18 years of age. |
| Sc | cheme Smallholder: |
| | roup Manager has set ICS Policy under "Group Manager Policy" signed y Buatan ICS Group Manager, for example: |
| - | KUD Tani Rukun (Scheme Smallholder) dated 19 December 2023, has been socialized to all smallholders on 19 December 2023. |

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| | | KUD Mitra Usaha (Scheme Smallholder) dated 20 Desember 2023, has been socialized to all smallholders on 20 Desember 2023 KUD Makarti Sawit (Scheme Smallholder) dated 13 December 2023, has been socialized to all smallholders on 13 December 2023. KUD Bhirawa Bhakti (Scheme Smallholder) dated 25 January 2024, has been socialized to all smallholders on 25 January 2024 In the Group Manager Policy, which is in point 10, it is stated: "It is prohibited to employ children under the age of 18 in any plantation operational activities". Based on interviews with samllholders sample (14 smallholders at KUD Tani Rukun, 13 samllholder KUD Makarti Sawit, 14 Smallholders of KUD Bhirawa Bhakti and 14 smallholders at KUD Mitra Usaha) during field | |
|-------|---|---|----------|
| | | visits, farmers have understood about child labor and stated that there are no workers (harvesting and fertilizing) under the age of 18. It was added that workers in Plasma Buatan I and II are on average 30-35 years old. | |
| 6.4.3 | (C) Young person maybe employed only for non-hazardous work with protective restrictions in place for that work. - Critical (Major) compliance - | Since the Company Policy was established in December 2019 until this surveillance 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 Perusahaari</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. | Complied |
| | | The company policy has been communicated to all employees of PT Inti Indosawit Subur – Buatan Group on 15 January 2024 (verified data: | |

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| attendance list, socialization materials, documentation). Socialization to all stakeholders (including local contractors) was also carried out on 14 March 2024 which was attended by 15 stakeholders. | |
|--|--|
| Verification has also been carried out on the work contract documents with third parties and also the supplier contract documents including 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. | |
| Based on verification of the Employee Master document for the period of June 2024, the ages of the youngest workers were identified when recruited, as follows: | |
| At Simpang Perak Estate; the youngest worker is Liusman Hura, born on 27/05/2003 and recruited on 23/02/2022 at the age of 18 years and 9 month. | |
| Di Buatan II POM; the youngest worker is Ari Aprianto, born on 03/08/2003 and recruited on 27/05/2022 at the age of 18 years and 9 month. | |
| Based on interviews with a sample of workers, they stated that up to now, there are no workers under 18 years of age. | |
| Scheme Smallholder: | |
| Group Manager has set ICS Policy under "Group Manager Policy" signed by Buatan ICS Group Manager, for example: | |
| - KUD Tani Rukun (Scheme Smallholder) dated 19 December 2023, has been socialized to all smallholders on 19 December 2023. | |
| - KUD Mitra Usaha (Scheme Smallholder) dated 20 Desember 2023, has been socialized to all smallholders on 20 Desember 2023 | |
| - KUD Makarti Sawit (Scheme Smallholder) dated 13 December 2023, has been socialized to all smallholders on 13 December 2023. | |
| | |

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| | | KUD Bhirawa Bhakti (Scheme Smallholder) dated 25 January 2024, has been socialized to all smallholders on 25 January 2024 In the Group Manager Policy, which is in point 10, it is stated: "It is | |
|-------|--|--|----------|
| | | prohibited to employ children under the age of 18 in any plantation operational activities". Based on interviews with samllholders sample (14 smallholders at KUD Tani Rukun, 13 samllholder KUD Makarti Sawit, 14 Smallholders of KUD Bhirawa Bhakti and 14 smallholders at KUD Mitra Usaha) during field visits, farmers have understood about child labor and stated that there are no workers (harvesting and fertilizing) under the age of 18. It was added that workers in Plasma Buatan I and II are on average 30-35 years old. | |
| 6.4.4 | The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live. - Minor compliance - | The company has committed to the use of child labor or under the age of 18 years as stated in the Company Policy dated December 1, 2019 (above). This policy is always communicated to all workers, stakeholders including suppliers and contractors. Communication is carried out in several ways, including: Socialization of Company Regulation: The company policy has been communicated to all employees of PT Inti Indosawit Subur – Buatan Group on 12-14 February 2024 (verified data: attendance list, socialization materials, documentation). The company policy has been communicated to all employees of PT Inti Indosawit Subur – Buatan Group on 15 January 2024 (verified data: attendance list, socialization materials, documentation). Socialization to all stakeholders (including local contractors) was also carried out on 14 March 2024 which was attended by 15 stakeholders. By installing warning boards (prohibition of child labor) in strategic places at the Buatan II Plantation head office, the Afdeling office, worker housing and other places considered strategic. The auditor | Complied |

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| | | team has verified the installation of the warning boards at the main plantation office and the afdeling office. Communicating through work contract documents with contractors and suppliers (including FFB suppliers) by creating special articles related to the prohibition of child labor (under 18 years old). Has verified by auditor tim on 2.2.2 above PT IIS-Buatan Plantation has also provided a channel to report any field operational inconsistencies with Company Policy through the hotline +62 8116009430 or email: whitleblow@rgei.com. | |
|----------|---|---|----------|
| Criteria | 6.5: There is no harassment or abuse in the workplace, and reproductive rig | ghts are protected. | |
| 6.5.1 | (C) A policy to prevent sexual and all other form of harassment and violence is documented, implemented and communicated to all levels of the workforce. Critical (Major) compliance - | The company has a policy regarding the prevention of sexual violence and harassment as stated in the one stipulated on: <i>"Kebijakan Perusahaan"</i> that was signed by Managing Director dated 1st December 2019, in point 15; "To prevent any sexual or physical abuses happen to women as well as to protect their reproductive rights". <i>"Kebijakan Group Manager"</i> dated 14th February 2020, that was signed by Manajer Group ICS Buatan, point 6 stated "<i>Mencegah pelecehan sexual dan berbagai bentuk kekerasan terhadap perempuan"</i> - Preventing sexual harassment and various forms of violence against women and protecting their reproduction rights" <i>"Kebijakan Koperasi Bhirawa Bhakti"</i> dated 6 September 2022 at point 11 stated "<i>Mencegah Pelecehan Seksual dan berbagai bentuk kekerasan terhadap perempuan Kerja Angkutan</i>" (No.: 05/KUD-BB/VI/2021, dated 11 August 2021) between KUD Bhirawa Bhakti and Sena (TBS Transporter) especially in Clause 7 explains the obligation | Complied |

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| | | of the transporter not to commit immoral acts, abuse, threaten or intimidate co-workers. | |
|-------|--|---|----------|
| | | Based on the results of interviews with harvest workers, spray workers and factory operational workers, it is known that the workers know that there is a prohibition against violence in any form. | |
| 6.5.2 | (C) A policy to protect the reproductive rights of all, especially of women, is documented, implemented and communicated to all levels of the | The company also has policies to protect the reproductive rights of workers, especially women stated on several document, such as: | Complied |
| | workforce. - Critical (Major) compliance - | "Kebijakan Koperasi Bhirawa Bhakti" dated 6 September 2022 at point 11 stated "Mencegah Pelecehan Seksual dan berbagai bentuk kekerasan terhadap perempuan serta melindungi hak- hak reproduksinya.". | |
| | | "Perjanjian Kerja Bersama 2022-2024" dated 13 March 2022 at clause VIII stated that Women workers get menstruation leave as well as maternity leave according to the labor law. | |
| | | The certificate holder also shows the implementation of granting the right to maternity leave to workers. | |
| | | Based on the results of interviews with fertilizer workers (permanent workers), it is known that workers also know that female workers have the right to maternity leave. | |
| 6.5.3 | Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified in accordance with applicable regulations in Indonesia. - Minor compliance - | For breastfeeding mothers and those who have children under 5 years old, the company has provided Child Care Places (TPA) located in each division/afdeling. In the TPA room, the company also provides special space and time for 1 hour for breastfeeding mothers who need time to breastfeed their babies. | Complied |
| | | The company has also identified its workers as young mothers and conducted consultations by distributing questionnaires on June 2024 to 2 young mothers at PKS Buatan II and Simpang Perak Plantation. | |

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| | | From the results of surveys and consultations, management issued several policies, including: | |
|-------|---|--|----------|
| | | Policy for employees who are breastfeeding; management issued a Memorandum from Farm Manager No. 171/ES-IIS/MEMO/01/20 dated January 4 2020, stated: the company guarantees female employees to breastfeed their children during working hours, by providing time and space for all female employees who have babies to breastfeed their children once for 45 minutes : in the morning at 10.00-10.45 WIB at the clinic or afdeling office or 11.30 - 12.15 WIB. | |
| | | Health needs for children/babies, the opportunity to be able to give breast milk to babies who are still breastfeeding, periodic immunizations and the need for care for children and babies in the plantation environment. | |
| | | Regular check-ups at the clinic to monitor the baby's health; The POSYANDU service program once a month at the Central TPA (Child Care Center) includes immunizations and vitamins. | |
| | | The company consistently carries out pregnancy tests on female workers who work as fertilizers and sprayers once every month. | |
| 6.5.4 | A grievance mechanism, which respects anonymity and protects complainants where requested, as long as the complaint is supported with adequate information, is documented, implemented and communicated to all levels of the workforce. - Minor compliance - | Until this audit was carried out, procedures related to complaints had not changed, i.e. Procedure No. SOP: XX-HR-308.5-RO; Revision: 0, December 11, 2009: Employee Complaints: Filing and Resolving. The complaint management mechanism that needs to maintain the confidentiality of complainants is contained in the draft company policy as one of the points of this policy states that: | Complied |
| | | "To provide appropriate information to those who ask and maintain confidentiality for whistle blower cases in accordance with laws and regulations regarding environmental and social issues, food safety, occupational health and safety, so that they can participate more in the decision-making process. to improve company performance". | |

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| Critoria | 6.6: No forms of forced or trafficked labour are used. | Based on interviews with stakeholders and related government agencies in Pelalawan Regency, in the 2023-2024 period, there were no recorded complaints from external parties (community around the plantation). | |
|----------|---|--|----------|
| 6.6.1 | (C) All work is voluntary and the following are prohibited: Retention of identity documents or passports; Payment of recruitment fees; Contract substitution without worker's consent 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 Critical (Major) compliance - | During this surveillance audit and according to work contract, confirmed that all work is voluntary and there is no: Retention of identity documents or passports; Payment of recruitment fees; 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 No form of forced labor occur in PT Inti Indosawit Subur – Buatan II POM and Simpang Perak Estate. Company has a policy to comply with manpower regulation UU No. 13 Tahun 2003. Company also has a policy to prevent and prohibit the forced labor as per "Kebijakan Perusahaan" signed by Managing Director on 1st December 2019. Stated in Company Policy point 17 " <i>Tidak memberikan pekerjaan dibawah ancaman, sanksi atau hukuman dimana pekerja tidak memiliki kebebasan untuk menyepakati pelaksanaan pekerjaar</i> ". All workers, including temporary workers, have a work agreement; regulates the scope of work, term of work agreement, working hours, salary payments, overtime and BPJS. | Complied |

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| | | Based on verification of the master list of employees for the period June 2024 and interviews with several workers during field visits, there are no indications of changes in contracts, storage of identity documents/passports, payment of recruitment fees, unintentional overtime, limiting workers' freedom to resign, sanctions for termination of employment, debt bondage and wage cuts (which were not agreed upon). | |
|-------|--|---|----------|
| | | Based on interviews with sample workers, the head of the gender committee and also the head of the PUK SPPP SPSI trade union, they stated that there had never been any coercion against workers, unpaid overtime and also the withholding of IDs or personal property at the time of recruitment. It was also added that workers were free to submit their resignations without any workers' rights being withheld. | |
| | | Scheme Smallholder: | |
| | | Similar to estate and mill, there is no forced and trafficked labour has noted during assessment in Scheme smallholder. | |
| | | KUD has a policy related to use of migrant worker inside "Kebijakan Koperasi". Based on document verification, there were no migrant worker used in cooperative, has been described on 6.4.1 above. | |
| | | All worker in cooperative office have work agreement. All of them already appointed as permanent worker. Field workers (Harvesters and Fertilizers) also have work agreements as casual daily workers and most of the workers are the families of the plot owners (smallholders/famers). | |
| 6.6.2 | (C) Where temporary (Specified Time Work Agreement/PKWT) or migrant workers are employed, a specific labour policy and procedures are established and evidence of implementation is available. - Critical (Major) compliance - | During audit it was confirmed that, there is no migrant workers in PT IIS Buatan II POM and Simpang Perak Estate including scheme smallholder. | Complied |

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| | | For permanent workers, term and condition Company has agreement in PKB which contain term and condition for workers. For casual workers contract available in " <i>Perjanjian Kerja Harian Lepas".</i> Labour policy are provided in "Kebijakan Perusahaan" and procedure to manage the workers are available in SOP AA-HR-305.2 – RO Rekrutmen dan Seleksi Karyawan, dated 1 February 2009. PT Inti Indosawit Subur – POM Buatan II and Simpang Perak Estate have issued special employment policies and procedures for non-permanent workers (PHL/PKWT); These policies and procedures are issued for each Simpang Perak Estate unit and the POM Agency: Memorandum No. 94/ES-KSP/MEMO/08/2020, dated 10 August 2020. These policies and procedures have been communicated to workers, especially non-permanent workers at Buatan II POM and Simpang Perak Estate on 11 August 2020. These procedures explain in detail the mechanism for recruiting non-permanent workers, time period and conditions as well as the needs of temporary workers in accordance with National Regulations (Law No. 13 of 2003, UU Cipta Kerja No. 6 Year 2023 and PP no. 35 Year 2021). | |
|------------|--|---|----------|
| Criteria 6 | 5.7: 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. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded. | responsible on OHS implementation and monitoring. The safety committee has defined in all estate and POM under P2K3 (<i>Panitia Pembina Keselamatan dan Kesehatan Kerja</i>). | Complied |
| | - Critical (Major) compliance - | Sample seen: Safety committee has defined under "Surat Keputusan Kepala Dinas Tenaga Kerja dan Transmigrasi Propinsi Riau nomor Kep.763/Disnakertrans-PK/SK-P2K3/VI/2024 tentang Pengesahan | |

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| | | Panitia Pembina Keselamatan dan Kesehatan Kerja (P2K3) PT Inti Indosawit Subur – Kebun Simpang Perak, updated on 28 June 2024 | |
|-------|--|---|----------|
| | | The company has also assigned the person who responsible on OHS expert (AK3- Umum), namely Mr A. Carlos with license number: 0477050542/Q-AK3U/14/V/2024 dated 6 May 2024 and valid until 05 May 2027. | |
| | | • Record of monthly meeting (P2K3), sample seen: MoM on 4 May 2024, agenda meeting: review on previous OHS meeting, review of inspection of PPE usage, review on accidents report. | |
| | | • Three months report on OHS performance for period January to March 2024 was sent to Manpower Agency in Pelalawan Regency. | |
| | | Scheme smallholders: | |
| | | Each KUD has established a team who has been responsible on implementation and implementation the OHS program. Based on interview during onsite audit, there was confirmed that smallholder's cooperative has established a team who has been responsible on implementation of OHS. | |
| 6.7.2 | Accident and emergency procedures in Indonesian language are in place and clearly understood by all workers. Assigned operatives trained in first aid are present in both field and other operations. First aid equipment is | PT Inti Indosawit Subur – Buatan II POM has defined the procedure for emergency response under Standard Operational Procedure – Environmental Field Procedure, such as: | Complied |
| | available at worksites. Records of all accidents are kept and periodically reviewed. | Nomor AA-KL-11-EFP <i>tentang Penanganan Tumpahan di Laboratorium</i> | |
| | - Minor compliance - | • Nomor AA-KL-14-EFP tentang Pengendalian Kebakaran Lahan | |
| | | • Nomor AA-KL-16-EFP <i>tentang Pengendalian Tumpahan B3 dan Limbah B3</i> | |
| | | Nomor AA-KL-17-EFP <i>tentang Pengendalian Ledakan Boiler, Tabung Gas dan Lainnya</i> | |

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| | | Nomer AA KI 19 EED tentang Dengendalian Compa Piumi Paniis dan | |
|-------|--|---|----------|
| | | Nomor AA-KL-18-EFP <i>tentang Pengendalian Gempa Bumi, Banjir dan</i> <i>Tanah Longsor</i> | |
| | | Nomor AA-KL-19-EFP tentang Tanggap Darurat Kabut Asap | |
| | | PT Inti Indosawit Subur – Buatan II POM has also pepared the procedure on work accident under "Standard Operasional Prosedur – Investigasi Kecelakaan Kerja nomor AA-SMK3-18001.02-R0", revision 0 dated 1 April 2018. | |
| | | Record of accident are kept by P2K3 (OHS Expert) and review during P2K3 meeting (monthly). Evidence of P2K3 meeting can be shown during audit. | |
| | | The monitoring carried out on monthly basis and results were discussed during safety committee meeting. The incident statistics include man- hours, lost time accident and Frequency rate (FR) and Severity rate (SR) were reported quarterly as P2K3 report by safety officer to Manpower office, sample seen: P2K3 report period January – March 2024 Buatan II POM and Simpang Perak Estate reported on April 2024. | |
| | | Buatan II POM and Simpang Perak Estate there is a 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). | |
| 6.7.3 | (C) Workers use appropriate personal protective equipment (PPE) which is provided free of charge to all workers in the workplace, to cover all potentially hazardous operations, such as pesticides application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing. Critical (Major) compliance - | PT Inti Indosawit Subur – Buatan II POM and Supply bases 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. Evidence of PPE provision and handover to workers can be shown during audit in " <i>Tanda Terima APD</i> ". During field visit and interview to Buatan II POM, Simpang Perak Estate and Scheme Smallholder it was sighted that all workers has use appropriate PPE during working and they explained that PPE is | Complied |

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| | | provided free of charge, when the PPE is broken because of the working usage workers can request to change for the new PPE. | |
|-------|--|--|----------|
| | | PPE provision of Buatan II POM and Simpang Perak Estate was sighted in ""Serah Terima Sepatu Karyawan Tahun 2023 and 2024" and "Pengambilan APD". PPE provision: helmet, earplug, earmuff, masker, leather handgloves, rubber handgloves, cotton handgloves, safety glasses, face shiled. | |
| | | Simpang Perak Estate has provide sanitation facilities for spraying operator, so that workers can change out of PPE, wash and put on their personal clothing. Sanitation facilities provide in area of Agrochemical warehouse with separate place. | |
| | | Based on field visit to Simpang Perak Estate can be demonstrated that sanitation facilities are well function and sufficient for spraying workers. | |
| 6.7.4 | Costs incurred from work related incidents, leading to injury or illness, are covered in accordance with applicable regulations or by the unit of | All workers have been provided with medical care and accident insurance (BPJS Ketenagakerjaan & BPJS Kesehatan). | Complied |
| | | The insurances were still valid as seen by the recent slip payment in January – May 2023 for estate and mill. | |
| | - Minor compliance - | Several insurance payments are reviewed and are in accordance with the number of workers. For example, auditor has verified the BPJS Ketenagakerjaan (Accident and pension insurance) and Kesehatan receipt of payments period of January - May 2023 for Simpang Perak Estate and Buatan II POM. | |
| | | BPJS Ketenagakerjaan Payment Kebun Simpang Perak period May 2024 (28 May 2024) for 316 permanent workers. Insurance including JKK, JKM and JHT, JP with fee code 419122375000. | |
| | | BPJS Ketenagakerjaan Payment Kebun Simpang Perak period May 2024 (28 May 2024) for 260 casual workers. Insurance including JKK, JKM and JHT, JP with fee code 419122179000. | |

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| | | BPJS Ketenagakerjaan Payment Mill Buatan II period June 2024 (24 June 2024) for 84 permanent workers. Insurance including JKK, JKM and JHT, JP with fee code 400000063239. | |
|-------|--|---|----------|
| | | BPJS Ketenagakerjaan Payment Mill Buatan II period June 2024 (24 June 2024) for 26 casual workers. Insurance including JKK, JKM and JHT, JP with fee code 400000063567. | |
| | | - BPJS Kesehatan Payment Kebun Simpang Perak period July 2024 (10 July 2024). With VA 8888890080069493. | |
| | | - BPJS Kesehatan Payment Mill Buatan II period June 2024 (10 June 2024). With VA 8888890000692538. | |
| | | Based on interview with sampled worker during the field visit in estate and mill, the affected workers received appropriate medical treatment from the insurance policy. | |
| 6.7.5 | Occupational injuries are recorded using Lost Time Accident (LTA) metrics. - Minor compliance - | PT Inti Indosawit Subur – Buatan II POM EHS team prepares safety index. The safety index is monitoring tool, indicating number of worker (at each operating units), number of major and minor accident as well as the lost time injury. | Complied |
| | | The monitoring carried out on monthly basis and results were discussed during safety committee meeting. The incident statistics include manhours, lost time accident and Frequency rate (FR) and Severity rate (SR) were reported quarterly as P2K3 report by safety officer to Manpower office, sample seen: P2K3 report period January – December 2023 and January June 2024. | |
| | | Buatan II POM and Simpang Perak Estate there is a 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): | |
| | | Kebun Simpang Perak Period 2023: $FR = 18.6$ and $SR = 89.5$ | |
| | | Buatan II POM period 2023: $FR = 9.2$ and $SR = 64.1$ | |

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| Principle 7: Protect the environment, conserve biodiversity and | The recorded incidents leads to the update of HIRAC or any applicable risk assessment, this was verified during interview with management representative and document review. | |
|--|--|----------------|
| Criteria 7.1: Pests, diseases, weeds and invasive introduced species and | re effectively managed using appropriate Integrated Pest Management (IPM | 1) techniques. |
| 7.1.1 (C) IPM plans are implemented and monitored to ensure effectiv control. Critical (Major) compliance - | Pre pest Own Estates According to the Agricultural Policy Manual SOP AA-APM-OP-1100.10. R6 Pengendalian Hama dan Penyakit (Pests & Disease Control), certificate holder has plan to implement integrated pest management. There is no change about the SOP during ASA2.3. According to the interview with pest control officer in Simpang Perak Estate and IPM census workers, obtain information that management has had a schedule to regularly monitored pest attack (census) as follows: • Census of caterpillar/bag worm by monthly basis. • Census of Ganoderma annually. • Census of Barn Owl Box occupation in three monthly bases. Verified document as follows: The last census in Simpang Perak Estate has been conducted in second week of June 2024. Result of census shows that pest attack is still under control (below the economic threshold) which is limit 5%, namely bagworm 0.43%, rat 1%, Ganoderma 0%. | Complied |

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| | | According to document verification during ASA2.3, pest monitoring and control sighted pest management plan to conduct caterpillar/bag worm census in by monthly and barn owl box monitored in three monthly bases. Census was conducted by field supervisor that help by person that assign by board of KUD. | |
|----------|--|---|----------|
| 7.1.2 | Invasive species are not to be used according to applicable regulation in managed areas, unless plans to prevent and monitor their spread are implemented. - Minor compliance - | The company only uses natural predators namely <i>Tyto alba</i> and <i>Sycanus dichotomus</i> in pest control efforts. Both predators are not recorded in invasive species according to the information listed on the website <u>www.cabi.org</u> on in global invasive species database <u>http://www.iucngisd.org/gisd/search.php</u> . | Complied |
| 7.1.3 | There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities. - Minor compliance - | Based on document verification, interview with management and stakeholders and field observation during ASA2.3 obtained information that there is no record use of fire for pest control. | Complied |
| Criteria | 7.2: Pesticides are used in ways that do not endanger health of workers, far | nilies, communities or the environment. | |
| 7.2.1 | (C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised. Critical (Major) compliance - | Based on the document verification and interview with management, obtain information that there is only pesticide usage for chemical weeding and pest control (if needed). Recommendation of pesticide used are refer to SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i> (weed control) where explain the weeds type, weeding control methods and eradication, pesticide characteristic, and procedures of application (spraying volume, calibration, chemical weeding interval, target and sprayer maintenance). | Complied |
| | | During the audit, found some pesticide list that usually used with active ingredients such as Amonium glufosinat, Metil metsufuron, Isopropil amina glifosat, and Trikopir Butoksi Etil. Certificate holder no longer using paraquat since 15 November 2019, according to the circular letter of Deputy Managing Director No. 008/DMD/MEMO/OCT/19 dated 22 | |

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| management u can be check ir PT Inti Indosav a list of pesticid | nit has registe n <u>http://pestisie</u> vit Subur – Bua les use that ref | red in agricultural n da.id/simpes_app/ir atan II (Simpang Pe | esticide used by the ninistry of Indonesia. It ndex.php. rak Estate) already has aan Pestisida dan LD50 | |
|--|--|---|---|--|
| Tahun 2024" a Agrochemical | Active | Register No. | Target | |
| Biotisagri Glufo 150 SL | ingredients Amonium glufosinat | RI.01030120062433 Valid until 31 Dec 20234 | Wood | |
| Supremo 480SL | Isopropil Amina Glifosat 480 g/l | RI.01030119941170 Valid until 21 Dec 2024 | Narrow leaf weed, <i>Asystasia, Imperata</i> <i>cylindrical</i> | |
| Metaprima | Metil melsulfuron | RI.01030120031897 Valid until 03 September 2024 | Broadleaf weeds, Ageratum conyzoides, Calopogonium mucuniodes, Clidemia hirta, Synedrella nodiflora. | |
| Biolon | Trikopir Butoksi Etil Ester 670 g/l | RI.01010120031921 Valid until 03 September 2024 | Wood | |
| Scheme Smal | llholder | | | |
| ingredients) th glyphosate, flu | at can used uoroksifir, me | by smallholder suc thyl metsulfuron a | mmendation (by active ch as isopropyl amine and triklofir. During cd pesticide with active | |

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| | | ingredients metsulfuror | isopropyl า. | amine | glypho | sate, fluo | roksifir a | nd methyl | |
|-------|---|----------------------------|--|--------|---------------|----------------------------|---------------------------------|--------------|----------|
| 7.2.2 | (C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per Ha and number of applications) are provided. - Critical (Major) compliance - | | nolder has sh mount of pes erak Estate | | | d of LD50 c | alculation | in each unit | Complied |
| | | Brand | Active Ingredient | LD50 | Total Used | Total Active Ingredient | Ratio Activ Ingredient Ha | | |
| | | Biotisagri Glufo 150 SL | Amonium glufosinat | 500 | 300 | 2 | 0.0071 | | |
| | | Meta Prima | Methyl metsulfuron | 5000 | 223,24 5 | 44,649 | 0.1752 | | |
| | | Supremo 480SL | Isopropil amina glifosat | 5000 | 1,311 | 2 | 0.0008 | | |
| | | Biolon | Trikopir Butoksi Etil Ester 670 g/l | 2733 | 116 | 93 | 2.1306 | | |
| | | Scheme sr | nallholders | ;: | | | | | |
| | | KUD | Agroche | emical | LD50 | Applica tion (Ha) | Qty (Litre) | Ratio/ Ha | |
| | | Bhirawa Bha | kti Supremo | | 480 | 128 | 45 | 0.000 | |
| | | Tani Rukun | Supremo | | 480 | 440 | 100 | 0.000 | |
| | | Mitra Usaha | Supremo | | 480 | 134 | 22 | 0.000 | |

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| | | | | 100 | | | | |
|-------|---|--|---|---|--|--|---|-------------|
| | | Makarti Sawit | Supremo | 480 | 176 | 68 | 0.000 | |
| | | Bina Mulia | Supremo | 480 | 200 | 33 | 0.000 | |
| | | • | | | | | | |
| 7.2.3 | (C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans. | | 2.3 audit obtain i best attack. All | | | | | |
| | - Critical (Major) compliance - | Based on inter | view with IPM su o outbreak that c | | | | presentative | 5 |
| 7.2.4 | There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in Indonesia best practice guidelines. - Minor compliance - | area to preve pesticide (acti <i>litura</i> infestat guidelines su | me pesticide us nt pest infestation ve ingredients L ion. This prophy ch as dosage, Asian Agri's Res | on. For ex amda sih /lactic usa interval a | xample, t alotrin) to age has and infes | here was prevent followed tation ra | a record of <i>Spodopter</i> the nationa ate. Also, in | f a l |
| 7.2.5 | Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions and paraquat, are not to be used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks. The due diligence refers to: - Minor compliance - 7.2.5a Judgment of the threat and verify why this is a major threat. | obtain inform weeding and used are refer <i>Pengendalian</i> weeding contr procedures o weeding interv | document verifi ation that there pest control (if to SOP AA-APM <i>Gulma</i> (Weed co rol methods and f application (so val, target and sp | e is only needed). -OP-1100. control) w eradicatic spraying orayer ma | pesticide Recomm .08-R6 dat here exp on, pestici volume, intenance | e usage endation ted 7 Dec lain the de chara calibratic | for chemica of pesticid ember 2015 weeds type cteristic, and on, chemica | |
| | | list that usual glyphosate, fl diklorida, diur | in card in chemic ly used with act <i>uoroksifir, methy</i> on, and lamda sil e 15 November | ive ingreo // <i>metsulfi</i> halotrin. C | dients suc <i>uron, triki</i> ertificate | h as <i>iso_l Iofir, diur</i> holder no | <i>propyl amin</i> on, paraqua longer usin | e t } |

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| | Deputy Managing Director No. 008/DMD/MEMO/OCT/19 dated 22 October 2019. |
|--|--|
| | To reduce the human and environmental risk, there is some continuous action that has been implemented as follows: |
| | • Set up the pesticide rotation. For example, chemical weeding rotation is 4 times a year where the rotation in immature and early mature more often than mature and old palm. |
| | • Using the ultralow volume nozzle to minimize water consumption and reduce the risk for environment. During the field visit to the pesticide store sighted the micron herby system knapsack as example. |
| | • Conducted regularly training for pesticide applicator and equipped them with appropriate PPE's. |
| | • Delaying the pesticide if weed or pest is under control. According to the interview with estate manager obtain information that the pesticide rotation can be delayed or reduced especially in mature or old palm where weeds/pest population are under control. |
| | • Minimalize contamination for pesticide applicator and their families by ensuring them to clean themselves before back home. |
| 7.2.5b Why there is no other alternative which can be used. | According to IPM procedures, certificate holder always using biological approach in order to monitoring pest attack. For example, estate using <i>Tyto alba</i> to monitor rat infestation than using rodenticide. |
| | To maintain ground condition especially weeding control, certificate holder has had a procedures SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: <i>Pengendalian Gulma</i> (Weed Control). This procedure has set the specific pesticide in with minimum risk in accordance with the target. |
| 7.2.5c Which process was applied to verify why there is no other less hazardous alternative. | Certificate holder through Asian Agri's Research and Development Department has examined some pesticide in specific target. The result |

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| | | 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). | |
| | 7.2.5d Process to limit the negative impacts of the application. | 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: | |
| | | • 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 technique. | |
| | 7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak. | 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. | |
| | | 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. Those application can be reduced in line with the palm ages. | |
| 7.2.6 | (C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they conduct. | PT Inti Indosawit Subur – Buatan Group 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) and local communities (for smallholder). They regularly attended training on pesticide handling that conducted by the pesticide supplier in collaboration with local pesticide committee. | Complied |

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| | - Critical (Major) compliance - | Based on document review and interview with random pesticide applicator during ASA2.3, it was known that they attended the last training on pesticide handling in January 2024. Some topics that discuss such as safety pesticide handling, national regulation related to pesticide, symbol and label awareness and emergency procedure if any contamination or poisonous. The worker can describe purpose of PPE usage, attending regularly medical check and safety working procedures. Workers that perform herbicide spraying in Simpang Perak Estate also perform corruing activity in smallholder plantation. | |
|-------|---|---|----------|
| | | perform spraying activity in smallholder plantation. Spraying team has been trained with pesticide handling training, agrochemical application training and limited pesticide training. Spraying team only handles herbicide to control the weed. Sprayers understood the type of chemical for each weed type, the hazard, the application, and appropriate PPE use. During audit year 2024, auditor team has also interviewed sample of | |
| | | smallholder representatives in KUD Bhirawa Bhakti, KUD Tani Rukun, KUD Mitra Usaha, KUD Makarti Sawit, and obtain information that the company has provide training session for them on how to be handling pesticide safely. For example, pesticide applicator shall use appropriate PPE during application, no smoke, avoid the direction of wind blows and cleaned their body after application to reduce contamination. | |
| 7.2.7 | (C) Storage of all pesticides in accordance with recognized best practices. | Estate | Complied |
| | - Critical (Major) compliance - | The location of the pesticides storage for the Simpang Perak Estate is in Buatan I Estate (centralized). | |
| | | Pesticides are always applied in accordance with the product label and storage instruction. During field visit at Pesticides Storage in Buatan Estate, it was known that: | |
| | | - The storage is permanent buildings. | |

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| Agrochemicals storage was locked in areas with limited access | |
|--|--|
| - The storage was ventilated and in good condition. | |
| - MSDS and hazard symbol label were provided nearby of | |
| agrochemicals | |
| - Emergency shower and eyewash were also provided to anticipate in case of an emergency of agrochemical handling. | |
| Permanent floor is cemented, the floor of the mixing of pesticides using ceramics, and equipped with a "spillage trap", the possible spillage was managed | |
| - Secondary containment was provided around the chemical storage area | |
| - Spill kit was also provided in the area. | |
| MSDS are available for all types of existing pesticides and he pesticide management and safety instructions are available. | |
| - The flow of waste water is channeled and stored so that it is not discharged into the environment. The water used is used for its dilution. | |
| Interview with spraying workers demonstrated that all of them have a good knowledge regarding pesticide usage and its material usage and toxicity. PPE for handling of chemicals were provided including boots, apron, safety glass, respiratory mask and hand gloves. PPE used was appropriate according to recommendations in any risk assessments. PPE provided and used can be easily replaced if damaged. All precautions attached to the products properly observed, applied, and understood by workers. | |
| All waste products have been identified and documented under the "Evaluasi Aspek-Dampak Lingkungan" (Environmental Aspect impacts) year 2023". Domestic waste is the main concern to be manage. | |
| | |

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| 7.2.8 | All pesticide containers that are disposed of and/or used for other purposes are managed according to applicable regulations and/or | Both Mill and Estate, has periodically schedule to manage the domestic waste. Scheme smallholders: Group manager Smallholder Buatan has a policy and mechanism to manage the waste from ex fertilizer sack according to procedure of "Pengelolaan Kemasan Ex (Bekas) Pupuk di Kebun No. 035/DOK/SOP/PT.IIS KLB-AA/2016" dated 2 December 2016. The ex fertilizer sack must be handled by triple rinse and use as loose fruit sack, the inner bag of fertilizer was delivered to collector. During field visit and interview with sample smallholder in ASA2.3 in KUD Bhirawa Bhakti, KUD Tani Rukun, KUD Mitra Usaha, KUD Makarti Sawit, they were well aware of the to manage the waste from ex fertilizer sack and empty chemical. All pesticides container is sent to the registered collector/transporter which approved by Environmental Ministry, namely PT Hazmat Techno | Complied |
|-------|---|--|----------|
| 7.2.8 | • • | and empty chemical. All pesticides container is sent to the registered collector/transporter which approved by Environmental Ministry, namely PT Hazmat Techno Indonesia as mentioned in the indicator 7.3.2 below. The verified manifest document are as follows: Transported on 27 March 2024 | Complied |
| | | Manifest Festronik No. KLHK-1720180767 – used oil; hazardous waste code: B105d. Manifest Festronik No. KLHK-1720181364 – used hazardous waste container; hazardous waste code: B104d. Manifest Festronik No. KLHK-1720181285 – used battery; hazardous waste code: A102d. Manifest Festronik No. KLHK-1720180871 – used rags; hazardous waste code: B110d. | |

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| | | Scheme smallholders: Group manager has a policy and mechanism to manage the waste from fertilizer sack according to procedure of "Prosedur Pemusnahan Wadah Bekas Bahan Kimia dan Diagram Alur Pembuangan Wadah Bekas Agrokimia". The fertilizer sack must be handled by triple rinse and use as loose fruit sack, the inner bag of fertilizer was delivered to collector. During field observation and interview with sampled smallholders, they were well aware of the to manage the waste from ex fertilizer sack and | |
|--------|--|--|----------|
| 7.2.9 | (C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying. Critical (Major) compliance - | empty chemical. Based on document review, interview to the management and stakeholders, it was known that until this audit (ASA2.3), there is no aerial application of pesticide throughout the company plantation and scheme smallholders. | Complied |
| 7.2.10 | (C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated. - Critical (Major) compliance - | PT Inti Indosawit Subur – Ukui Group has conducted the special annual medical surveillance for pesticides operators. Scheme smallholder's: Special medical check-up for smallholder's pesticide operator is include with Estate, because those chemical/spraying operators are work at Estate and Smallholders area. Sample: KUD Birawa bakti, KUD Tani Rukun, KUD Mitra Usaha, KUD Makarti Sawit Last special MCU was conducted on 29 June 2024 Focus Clinical Laboratory – Pekanbaru. Data seen: MCU for 57 workers handling with chemical, such as pesticide, herbicide, and fertilizer applicator and for PIC in pesticides storage. Special Medical Check-Up was covered to cholinesterase test, | Complied |



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| 7.2.11 | (C) No pesticide-related work is carried out by pregnant or breastfeeding women, or people with medical limitations and they are offered other equivalent work alternatives. - Critical (Major) compliance - | The company has prohibits pregnant or breast-feeding women to perform chemical spraying. In order to mitigate, estate performed monthly pregnancy test. The organization has kept the record that spraying is not conducted by pregnant or breast-feeding women or people with medical limitations. The company has been conducting PP Test (pregnant test) every month. The last of pregnancy test conducted in June 2024. All the female sprayer in well condition and not being pregnant nor breast feeding. | Complied |
|-------------------------|--|--|----------|
| | | Based on interview with clinic staff (nurse), the pregnant test was conducted in order to ensure there are no pregnant workers in spraying activities. | |
| mills on t the age o | to Act No. 13 of 2003 concerning Manpower, Act No. 35 of 2014 concerning the development and physical, mental and social health of children, the nation of 18 for pesticide spraying. For this reason, the provisions of young workers 7.3: Waste is reduced, recycled, reused and disposed of in an environmental | onal interpretation mandates that the unit of certifications does not employ under 18 years in indicator 7.2.11 are irrelevant. | |
| 7.3.1 | A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented in accordance with applicable laws and regulations. - Minor compliance - | There are no changes of compliance statement in this surveillance audit 2.3 The company has identified waste resulting from operational activities, the identification is grouped based on activities that generate waste, name of waste, waste code, type of solid or liquid, and its management. The determination and classification of waste codes uses the reference to Government Regulation number 101 of 2014. The company also has procedures related to waste management and utilization which are listed in procedure to handle hazardous waste titled " <i>Prosedur Penanganan Limbah B3 No.AA-KL-06- EFP</i> " explains methods to collecting the waste, recording in balance and disposal through licensed third party transporter. | Complied |

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| understood by workers and managers, is demonstrated. Minor compliance - Which is approved by the Environmental Ministry. Document of agreements and third parties' licenses: SPK for Transport and Management of LB3 between PT Inti Indosawit Subur and PT Hazmat Techno Indonesia and PT Pengolahan Limbah Industri Bekasi No. 06/SPJ/LEG-IIS/I/23 dated 2 January 2023. The agreement period starts from 1 January 2023 – 31 December 2024. SPK for Transport and Management of LB3 between PT Inti Indosawit Subur and PT Hazmat Techno Indonesia and PT Pengolahan Limbah Industri Bekasi No. 06/SPJ/LEG-IIS/I/23 dated 2 January 2023. The agreement period starts from 1 January 2023 – 31 December 2024. SPK for Transport and Management of LB3 between PT Inti Indosawit Subur and PT Hazmat Techno Indonesia and PT Muhtomas No. 07/SPJ/LEG-IIS/XII/22 dated 2 January 2023. The agreement period starts from 1 January 2023 – 31 December 2024. PT Hazmat Techno Indonesia – B3 Transportation (special operation) | | | The company also has a Licensed Hazardous Waste Temporary Storage based on the Decision Letter of the Integrated Investment and Licensing Agency number: KPTS.311/BPMP2T-PLY/XI/2021, dated 21 November 2021, the license valid until 20 November 2026. | |
|--|-------|--|--|----------|
| permit to transport dangerous goods (B3)) based on the Decree of the Director General of Land Transportation No. 91201085303790003 dated 1 March 2023 and valid until 1 March 2028. NIB : 91201085303790003 dated 1 March 2023 with KBLI Code 49432 "Angkutan Bermotor Untuk Barang Khusus" SPK for Transport and Management of LB3 between PT Inti Indosawit Subur and PT Hazmat Techno Indonesia and PT Putra Restu Ibu Abadi No. 08/SPJ/LEG-IIS/I/23 dated 2 January 2023. The | 7.3.2 | understood by workers and managers, is demonstrated. | The hazardous waste is sent to the registered collector/transporter which is approved by the Environmental Ministry. Document of agreements and third parties' licenses: SPK for Transport and Management of LB3 between PT Inti Indosawit Subur and PT Hazmat Techno Indonesia and PT Pengolahan Limbah Industri Bekasi No. 06/SPJ/LEG-IIS/I/23 dated 2 January 2023. The agreement period starts from 1 January 2023 – 31 December 2024. SPK for Transport and Management of LB3 between PT Inti Indosawit Subur and PT Hazmat Techno Indonesia and PT Muhtomas No. 07/SPJ/LEG-IIS/XII/22 dated 2 January 2023. The agreement of LB3 between PT Inti Indosawit Subur and PT Hazmat Techno Indonesia and PT Muhtomas No. 07/SPJ/LEG-IIS/XII/22 dated 2 January 2023. The agreement period starts from 1 January 2023 – 31 December 2024. PT Hazmat Techno Indonesia – B3 Transportation (special operation permit to transport dangerous goods (B3)) based on the Decree of the Director General of Land Transportation No. 91201085303790003 dated 1 March 2023 and valid until 1 March 2028. NIB : 91201085303790003 dated 1 March 2023 with KBLI Code 49432 "Angkutan Bermotor Untuk Barang Khusus" SPK for Transport and Management of LB3 between PT Inti Indosawit Subur and PT Hazmat Techno Indonesia and PT Putra | Complied |

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| PT Pengolahan Limbah Industri Bekasi – B3 waste management services based on the Decree of the Minister of LHK RI No. S.31/Menlhk/Setjen/PLB.3/1/2019 dated January 21, 2019. | |
|--|--|
| PT Putra Restu Abadi – B3 waste management services based on the Decree of the Minister of LHK RI No. S.575/Menlhk/Setjen/PLB.3/8/2020 dated 31 August 2020. | |
| SPK for Transport and Management of LB3 between PT Inti Indosawit Subur with PT Hazmat Techno Indonesia and PT Trigunapratama Abadi No. 09/SPJ/LEG-IIS/I/23 dated 2 January 2023. The agreement period starts from 1 January 2023 – 31 December 2024 | |
| PT Trigunapratama Abadi – B3 waste management services based on the Decree of the Minister of LHK RI No S.1097/Menlhk/Setjen/PLB.3/12/2019 dated 23 December 2019. | |
| The verified manifest document are as follows: | |
| Transported on 27 March 2024 | |
| Manifest Festronik No. KLHK-1720180767 – used oil; hazardous waste code: B105d. | |
| Manifest Festronik No. KLHK-1720181364 – used hazardous waste container; hazardous waste code: B104d. | |
| Manifest Festronik No. KLHK-1720181285 – used battery; hazardous waste code: A102d. | |
| Manifest Festronik No. KLHK-1720180871 – used rags; hazardous waste code: B110d. | |
| Based on interview with workers who handles pesticides, they understood the disposal of empty pesticides containers, such as: Empty | |



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| | | chemical containers re-used only for mixing purposes, unusable are triple rinsed, punctured and disposed to the approval collector. | |
|----------|--|---|----------|
| 7.3.3 | The unit of certification does not use open fire for waste disposal. - Minor compliance - | Based on the results of field observations at the location of the scope of certification, such as employee housing, factory operational locations, the banks of the Kerinci river, the auditors did not find any traces of waste burning. From the results of interviews with workers in workshop, warehouse and land application, they are understood that all hazardous waste was returned to Hazardous Waste Temporary Storage. | Complied |
| Criteria | 7.4: Practices maintain soil fertility at, or where possible improve soil fertility | y to, a level that ensures optimal and sustained yield. | |
| 7.4.1 | Good agricultural practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts is documented. - Minor compliance - | Own Estates Both own estate and smallholder has had the procedure related to manage soil fertility (see detail in indicator 3.3.1). The implementation of manuring is based on fertilizer recommendation that set by Asian Agri's Research and Development Department. Fertilizer dosage has set according to the soil needed refer to SSU/LSU. Scheme Smallholder: Based on interview with plasma manager obtain information that the fertilizer recommendation set by Asian Agri's Research and Development Department. No fertilizer applied in riparian area to minimize environmental impact. There is no change related to the SOP until this ASA2.3 audit. | Complied |
| 7.4.2 | Analysis of tissue samples (e.g. leaves) and soil on a regular basis to monitor and manage changes in soil fertility and plant health is documented. - Minor compliance - | According to the Asian Agri's agricultural policy, soil sampling conducted every 6 years while leaf sampling conducted annually. Soil sampling refers to R&D AA IK Profil Tanah Rev.00 "Instruksi Kerja Pengambilan Sampel Tanah Asian Agri Group" dated 09/01/2016, the Work | Complied |

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| | | Instruction has explained that the soil sampling is conducted every 6 years and the document valid for 7 years. | |
|-------|---|---|----------|
| | | Based on document verification sighted the report of soil and leaf sampling in own estate and smallholders as follows: | |
| | | • The last soil sampling conducted on 11 November 2020. Parameter that tested is N, C, K, Ca, Mg and pH. Verified samples: | |
| | | P1, Block C903, No lab 20S2992 – 20S2995 depth 0-22,22-40, 40-70 and 70-130. | |
| | | P2, Block D16c/2016, No Lab 20S2996-20S300, depth 0-17, 17- 40, 40-62, 62-80 and 80-120. | |
| | | P3, Block A17h/2017, No Lab 20S2996-20S300, depth 0-17, 17- 40, 40-62, 62-80 and 80-120. | |
| | | P4, Block B91a/1991, No Lab 20S3006-20S3011, depth 0-12, 12-30, 30-58, 58-84, 84-120 and 120-160. | |
| | | P5, Block B91a/1991, No Lab 20S3012-20S3016, depth 0-19, 19-42, 42-70, 70-120, 120-160. | |
| | | P6, Block D16d/2016, No Lab 20S3017-20S3020, depth 0-35, 35-61, 61-90, 90-130. | |
| | | • The last leaf sampling conducted in April 2023. Parameter that tested is major element (Ash, N, P, K Mg, Ca) dan Minor element (B, Cu, Zn, Mn, Fe). | |
| | | Those reports are converted to be fertilizer recommendation by Asian Agri's Research and Development Department. The last Leaf Sampling will be the basis for determining fertilizer recommendations for the year 2024. | |
| 7.4.3 | A nutrient recycling strategy is in place, which include the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers. | According to the Agricultural Policy Manual, certificate holder has had a guidance in organic fertilizers such as Empty Fruit Bunch (EFB) and Palm Oil Mill Effluent (POME). Certificate holder has implemented EFB application in estate with dosage 30 – 50 ton/Ha in normal soil and | Complied |
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| - Minor compliance - | POME with dosage 750 m3/Ha only Sei Lala Estate which is near the Buatan II POM. | | | | | |
|----------------------|--|------------------------|--------------|---|--|--|
| | | | | e application of organic and | | |
| | | | | pplication of ZA fertilizer with | | |
| | | | | impang Perak Estate. The ation stipulated by Asian Agri | | |
| | Research and D | | | ation supulated by Asian Agin | | |
| | EFB and POME | application in | 2023 and 202 | 24 (until June): | | |
| | 2023 | | | | | |
| | Month | POME (m ³) | EFB (MT) | | | |
| | January | 13,538 | 620.93 | | | |
| | February | 15,362 | 801.42 | | | |
| | March | 14,705 | 521.77 | | | |
| | April | 13,076 | 156.01 | | | |
| | Мау | 19,240 | 764.71 | | | |
| | June | 13,013 | 684.32 | | | |
| | July | 11,874 | 514.5 | | | |
| | August | 12,738 | 616.47 | | | |
| | September | 15,034 | 584.51 | | | |
| | October | 16,325 | 824.53 | | | |
| | November | 13,484 | 713.56 | | | |
| | December | 15,586 | 132.90 | | | |
| | Total | 173,975 | 6,936.63 | | | |

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| 2024 (| until | May) |
|--------|-------|------|
|--------|-------|------|

| <u> </u> | 17 | |
|----------|------------------------|----------|
| Month | POME (m ³) | EFB (MT) |
| January | 14928 | 41.04 |
| February | 15223 | 7.60 |
| March | 16259 | 3.06 |
| April | 14148 | 0.00 |
| Мау | 18514 | 9.00 |
| Total | 79,072 | 60.70 |

For 2024, EFB application in Simpang Perak Estate has applied in less than usual, due to transferred to scheme samllholders under buatan II POM with a total 1,474MT.

Scheme Smallholder:

Based on document review, it was known that there is a EFB application in scheme smallholder (for Immature Area). For year 2024 until May 2024 the EFB application is 1,474 MT.

According to the interview with smallholder representatives, KUD Bhirawa Bakti that still applied the fertilizer according to fertilizer recommendations for their whole areas, due to the area was immature area, while other Cooperative/KUD did not apply fertilizer because it was in the replanting stage. The policy refers to Memorandum Scheme smallholders Manager/Plasma No. 239/ES-KLB/MEMO/12/2022 dated 21 December 2022 related to "Policy for Fertilizer Activity due to the Replanting Process" to all Cooperative administrators.

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| 7.4.4 | Records of fertilizer inputs are maintained. - Minor compliance - | The result of leaf sampling analysis, soil sampling analysis along with visual analysis, planting material, planting age and rain fall are considered in proposing the Fertilizer Recommendation. | | | | |
|-------|--|---|-----------|-------------------------|---------|--|
| | | Fertilizer realization ir (until June) for examp 2023 | | Estate for year 2023 ar | nd 2024 | |
| | | Afdeling I | | | | |
| | | Fertilizer | Plan (Kg) | Realization (Kg) | | |
| | | Dolomite | 311,034 | 311,034 | | |
| | | HGFB | 13,947 | 13,947 | | |
| | | MOP/KCL | 453,734 | 453,734 | | |
| | | RP | 232,658 | 232,658 | | |
| | | Urea | 322,121 | 447,008 | | |
| | | Afdeling II | | 11 | | |
| | | Fertilizer | Plan (Kg) | Realization (Kg) | | |
| | | Dolomite | 115,759 | 116,209 | | |
| | | HGFB | 13,947 | 13,947 | | |
| | | MOP/KCL | 195,440 | 195,440 | | |
| | | RP | 154,052 | 154,052 | | |

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| | | Urea | 150,768 | 204,613 | | |
|----------|--|---|--|--|---|----------|
| | | Scheme smallholder | | | | |
| | | Plasma Manager ha KLB/MEMO/12/2022 dat Kebun Plasma Buatan scheme smallholders o Plasma Buatan", the Me be eliminated 1-2 years who will continue to ap refer to this recommen with dosage 1Kg/tree w According to the inter Bhirawa Bhakti, KUD Ta was not applied the ferti in the next two year. | ed 21 December related to Polic f Buatan - "Ke emo was explain before replanting ply fertilizer, the dation, namely 2 ith rotation 1 tim rview with sma ni Rukun, KUD N | 2022 for Penguru bijakan Aplikasi I ed for fertilizer ap bijokan Aplikasi I ed for fertilizer ap big. However, if ther n for the dosage, ZA/AC, MOP, RP e per year. Ilholder represen fitra Usaha, KUD | s KUD and KT Application of Pupuk Petani oplication can e are farmers /tree you can and Dolomite tatives, KUD Makarti Sawit | |
| Criteria | 7.5: Practices minimise and control erosion and degradation of soils. | 1 - | | | | |
| 7.5.1 | (C) Maps that identify marginal and fragile soils, including steep sloped land are available. | There is no change in t Perak Estate and Schem | | | | Complied |
| | - Critical (Major) compliance - | Simpang Perak Estate | e: | | | |
| | | Simpang Perak Esta Soil Analysis in PT In in October – Decen Tanah Semidetil Are Subur Kebun Buata location in plain wit parent material is cl | nti Indosawit Sul mber 2008. Rep ea Perkebunan k an". Based on h hilly tuffaceou | our – Buatan Esta ported under "Laj Kelapa Sawit PT I the report, the j s sedimentary roo | te carried out poran Survey inti Indosawit physiographic cks. Lithology | |

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| to hilly. Natural fertility is low to medium. |
|---|
| Soil map scale 1:20,000 available, from semi- detailed soil survey 2008 by R&D Asian Agri. The predominant soil type identified in Division IV, V and VI Buatan Estate composed of Typic dystrudepts (dominant), Typic kandiudults, Typic Endoaquults, Typic endoaquepts. |
| • Topographic map scale 1:20,000 available, from semi-detailed soil survey the slope between 0-8%, 8-15%, 15-30% and >30%. The data and field information from semi-detailed soil survey 2008 by R&D Asian Agri. |
| Soil suitability: S2 2,656 Ha (47.2%) with limiting factor of low natural fertility; S3 2,050 Ha (36.4%) with limiting factor of topographic condition; N1 (not suitable) 925 Ha (16.4%) with limiting factor of slope more than 30% and sandy soil with rapid drainage. |
| Scheme Smallholder: |
| The soil map for all individual member was available at Plasma Buatan office and KUD office with scale 1:50,000. There are 4 series of soil type defined by Research and Development Asian Agri based on soil survey on April 2014 and soil survey semi detail on June 1998: |
| 1. Typic Dystrudepts |
| 2. Typic Endoaquepts |
| 3. Typic Endoaquults |
| 4. Typic Kandiudults |
| Soil map and soil survey result recorded in "Laporan Survei Tanah Tinjau Kebun Plasma Buatan". |



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| | | 1 | |
|-----------------------|--|---|---------------|
| 7.5.2 | The replanting of palm oil is not conducted extensively on steep terrain in accordance with applicable regulations. - Minor compliance - | Based on field visit in slope area especially in replanting areas known that the management unit has provide terrace contour. For example, in replanting area (Estate and Smallholder). There is no fire usage during that process. The management unit also provide legume cover crop to minimize the soil erosion. Therefore, can be concluded that the replanting of palm oil is not conducted extensively on steep terrain in accordance with applicable regulations. | Complied |
| 7.5.3 | New palm oil planting is not conducted on steep terrain in accordance with applicable regulations. - Minor compliance - | Based on document review, interview to the management and field visit during ASA2.3, it was known that there is no new palm oil planting in Simpang Perak Estate. | Complied |
| Criteria operation | 7.6: Soil surveys and topographic information are used for site planning ins. | in the establishment of new plantings, and the results are incorporated i | nto plans and |
| 7.6.1 | (C) Evidence of long-term land suitability for oil palm cultivation, soil maps or soil surveys that identify marginal and fragile soils, including steep terrain are available, in planning and operations. - Critical (Major) compliance - | Based on the document review during ASA2.3, the results of the semi- detailed soil survey conducted by Asian Agri Research and Development dated 5 October 2017 found that there were areas that were categorized as non-conditional (N1) covering an area of 925 Ha (16.4% of the total area). To optimize those area, contour terraces and empty bunch applications should be implemented. | Complied |
| 7.6.2 | Extensive planting on marginal and fragile soils is avoided or, if necessary, carried out according to the best-practice soil management plan. - Minor compliance - | Based on soil Analysis carried out by R & D in December 2008 in Buatan Estate. Reported under " <i>Laporan Survey Tanah Semidetil Area</i> <i>Perkebunan Kelapa Sawit PT Inti Indosawit Subur Kebun Buatan"</i> . Based on the report, the physiographic location in plain with hilly tuffaceous sedimentary rocks. Lithology parent material is clay and sand. Topographic of the area is rolling to hilly. Natural fertility is low to medium. There is no peat soil identified in Simpang Perak Estate according to the latest soil analysis by R & D Asian Agri. | Complied |
| | | There is no extensive planting within the certified area of PT Inti Indosawit Subur – Simpang Perak Estate and Buatan Plasma in | |

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| | | accordance with Soil Analysis Report carried out by R & D in December 2008. | |
|----------|--|---|----------------|
| 7.6.3 | Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance - | Based on soil Analysis carried out by R & D in December 2008 in Buatan Estate. Reported under " <i>Laporan Survey Tanah Semidetil Area</i> <i>Perkebunan Kelapa Sawit PT Inti Indosawit Subur Kebun Buatan</i> ". Based on the report, the physiographic location in plain with hilly tuffaceous sedimentary rocks. Lithology parent material is clay and sand. Topographic of the area is rolling to hilly. Natural fertility is low to medium. There is no peat soil identified in Simpang Perak Estate according to the latest soil analysis by R & D Asian Agri. | Complied |
| | | There is no extensive planting within the certified area of PT Inti Indosawit Subur – Simpang Perak Estate and Buatan Plasma in accordance with Soil Analysis Report carried out by R & D in December 2008. | |
| 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 within certified area of PT Inti Indosawit Subur – Simpang Perak Estate and Buatan Plasma after November 2005. Currently, replanting activities are still in progress. First cycle starts from year 1988, 1989, 1990 and 1991. | 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 - | There is no new planting within certified area of PT Inti Indosawit Subur – Simpang Perak Estate and Buatan Plasma after November 2005. Currently, replanting activities are still in progress. First cycle starts from year 1988, 1989, 1990 and 1991. | Complied |
| | DURAL NOTE: Maps and other documentation for peatlands are provided, udit guide (See Procedural Notes for Indicator 7.7.5 below). | prepared and shared according to the RSPO Working Group (Peatland Wo | orking Group / |
| 7.7.3 | (C) Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance - | There is no change in information related to the type of land in the scope of certification, where Based on Soil Analysis carried out by R & D on December 2008 in Buatan Estate. Reported under " <i>Laporan Survey</i> | Complied |

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| Typic Endoaquults 290 ha Typic Kandiudults 621 ha | |
|---|--|
| Soli map scale 1.20,000 are available, from semi-detailed soli survey 2008 by R&D Asian Agri. The predominant soil type identified in Buatan Estate composed of: Typic Distrudepts 4,040 ha Typic Endoaquents 140 ha Typic Endoaquepts 515 ha | |
| Tanah Semidetil Area Perkebunan Kelapa Sawit PT Inti Indosawit Subur Kebun Buatan".Based on the report, the physiographic location in plain with hilly tuffaceous sedimentary rocks. Lithology parent material is clay and sand. Topographic of the area is rolling to hilly. Natural fertility is low to medium. There is no peat soil identified in Simpang Perak Estate according to the latest soil analysis by R & D Asian Agri.Soil map scale 1:20,000 are available, from semi-detailed soil survey | |

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| | | Based on soil map of Kebun Plasma Buatan, issued by Asian Agri Research and Development Centre Tebing Tinggi – Sumatera Utara, that include in "Laporan Survei Tanah Tinjau Kebun Plasma Buatan" there was no peat soil in Kebun Plasma Buatan. There are 4 series of soil type defined by Research and Development Asian Agri based on soil survey on April 2014 and soil survey semi detail on June 1998: 1. Typic Dystrudepts 2. Typic Endoaquepts 3. Typic Endoaquults 4. Typic Kandiudults. | |
|-------|--|--|----------|
| 7.7.4 | (C) Availability of implementation evidence of the water and land cover management program. - Critical (Major) compliance - | There is no change in information related to the type of land in the scope of certification, where Based on Soil Analysis carried out by R & D on December 2008 in Buatan Estate. Reported under " <i>Laporan Survey</i> <i>Tanah Semidetil Area Perkebunan Kelapa Sawit PT Inti Indosawit Subur</i> <i>Kebun Buatan</i> ". Based on the report, the physiographic location in plain with hilly tuffaceous sedimentary rocks. Lithology parent material is clay and sand. Topographic of the area is rolling to hilly. Natural fertility is low to medium. There is no peat soil identified in Simpang Perak Estate according to the latest soil analysis by R & D Asian Agri. Based on the results of field observations by the auditor in the Buatan | Complied |
| 7.7.5 | (C) Drainability assessments are conducted for plantations planted on peat following the RSPO Drainability Assessment Procedure, or other method recognized by RSPO, (at least five years or in accordance with the provisions of the RSPO Drainability Assessment Procedure) before replanting. The results of the assessment are used to determine the period of replanting to be carried out, as well as to gradually replace oil palm cultivation for at least 40 years or two cycles, (whichever is longer), before | Estate and Buatan Plasma areas, there is no indication of peat land. There is no change in information related to the type of land in the scope of certification, where Based on Soil Analysis carried out by R & D on December 2008 in Buatan Estate. Reported under " <i>Laporan Survey</i> <i>Tanah Semidetil Area Perkebunan Kelapa Sawit PT Inti Indosawit Subur</i> <i>Kebun Buatan</i> ". Based on the report, the physiographic location in plain with hilly tuffaceous sedimentary rocks. Lithology parent material is clay and sand. Topographic of the area is rolling to hilly. Natural fertility is | Complied |

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| | 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. - Critical (Major) compliance - | low to medium. The entire area of the scope certification is a mineral land. There was no peat soil in the operational area. Based on the results of field observations by the auditor in the Simpang Perak Estate and Buatan Plasma areas, there is no indication of peat land. | |
|--|--|--|--|
| currently and will ir unit of cer units that The unit of | URAL NOTE: For 7.7.5: Detailed information on the RSPO Drainability Assesses being adjusted / tested by the RSPO Working Group on Peatlands (Peatland Include additional Guide on the steps to be followed after deciding not to represent the concerned. It is recommended that the trial methodology period is period is period in the option to delay replanting until the issuance of the representation of natural vegetation will be regulated by the PLWG. | I Working Group / PLWG). The final version must obtain PLWG approval in plant and the consequences for other stakeholders, farmers, local commu proposed to be extended for 12 months for all relevant management units (in PLWG so that existing procedures can be further refined as needed before | January 2019 nities, and the e management January 2020. |
| 7.7.6 | (C) All existing plantations on peat are managed according to applicable laws and/or "RSPO Guidelines for Best Management Practices (BMP) for Oil Palm Cultivation that are already on Peatlands", version 3 (June 2019) along with related audit guidelines (May 2019). Critical (Major) compliance - | There is no change in information related to the type of land in the scope of certification Soil Analysis carried out by R & D in December 2008 in Buatan Estate/Simpang Perak Estate. Reported under "Laporan Survey Tanah Semidetil Area Perkebunan Kelapa Sawit PT Inti Indosawit Subur Kebun Buatan". Based on the report, the physiographic location in plain with hilly tuffaceous sedimentary rocks. Lithology parent material is clay and sand. Topographic of the area is rolling too hilly. Natural fertility is low to medium. There is no peat soil identified in Simpang Perak Estate according to the latest soil analysis by R & D Asian Agri. Soil map scale 1:20,000 are available, from semi-detailed soil survey 2008 by R&D Asian Agri. The predominant soil type identified in Buatan Estate composed of: Typic Distrudepts 4,040 ha Typic Endoaquents 140 ha Typic Endoaquepts 515 ha | Complied |

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| Typic Endoaquults 290 ha | |
|---|--|
| Typic Kandiudults 621 ha | |
| Typic Udipsaments 25 ha | |
| Total 5,361 ha | |
| Topographic map scale 1:20,000 available, from semi-detailed soil survey the slope between 0-8%, 8-15%, 15-30% and >30%. The data and field information from semi-detailed soil survey 2017 by R&D Asian Agri. Soil suitability: S2 2,656 Ha (47.2%) with limiting factor of low natural fertility; S3 2,050 Ha (36.4%) with limiting factor of topographic condition; N1 (not suitable) 925 Ha (16.4%) with limiting factor of slope more than 30% and sandy soil with rapid drainage. Therefore, drainability assessment of peat soils was not applicable for Simpang Perak Estate. | |
| Scheme Smallholder: | |
| Based on soil map of Kebun Plasma Buatan, issued by Asian Agri Research and Development Centre Tebing Tinggi – Sumatera Utara, that include in "Laporan Survei Tanah Tinjau Kebun Plasma Buatan" there was no peat soil in Kebun Plasma Buatan. There are 4 series of soil type defined by Research and Development Asian Agri based on soil survey on April 2014 and soil survey semi detail on June 1998: | |
| 1. Typic Dystrudepts | |
| 2. Typic Endoaquepts | |
| 3. Typic Endoaquults | |
| 4. Typic Kandiudults. | |
| | |

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| 7.7.7 | (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. - Critical (Major) compliance - | applicable for Simpang Perak Estate. | Not Applicable |
|----------|--|--------------------------------------|-------------------|
| Criteria | 7.8: Practices maintain the quality and availability of surface and groundwat | ter. | |
| 7.8.1 | A water management plan is available and is implemented to support efficient use of water sources and continuous availability and avoid negative impacts on other users in the catchment. The plan referred to contains the following matters: - Minor compliance - 7.8.1a The unit of certification does not limit access to clean water or does not pollute the water used by the community. | | Complied |

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| | | The company has a surface water quality monitoring program conducted every semester by an accredited laboratory (PT ITEC Solution Indonesia) on 23 November 2023. Currently the company is conducting surface water testing using quality standards that refer to PP 22 of 2021 Class II. The results of these tests will then be reported to the relevant Office through the "RKL-RPL Report" every semester. Based on the test results, it is known that all parameters are in accordance with the provisions. | |
|-------|--|--|----------|
| | 7.8.1b Workers have adequate access to clean water. | The results of observations and interviews with workers show that the company has also provided access to clean water for workers by providing hygienic water for drinking and water for daily needs. The company also conduct Clean Water analysis by an accredited laboratory (PT ITEC Solution Indonesia) and the result comply to the regulation, for example the result of analysis on January 2024 the reference of analysis report is based on PERMENKES No 2/2023. The result shown comply with the regulation. | |
| 7.8.2 | (C) Water courses and wetlands are protected, including the maintenance and restoration of riparian zones and other buffer zones during or before replanting, in accordance with the "RSPO Manual on BMPs for the management and rehabilitation of riparian reserves" (April 2017) or Simplified Guide Management and Rehabilitation of Riparian Reserves (2018). Critical (Major) compliance - | River stream in the company area are protected by the company. This is evidenced by the results of field observations on the riparian area, the company has managed the river border by installing signboards as HCV areas and painting on oil palm trees as a marker for spraying limits. In addition, there are no traces of chemical application in the riparian border. This was also consistent with the results of interviews with 3 herbicide spraying officers who stated that they would not spray the area around the riverbank. | Complied |
| | | The river border that enters the planted area is protected by the company and the company has a policy not to carry out land clearing or replanting in the river border area. The results of interviews with company representatives revealed that river borders that entered the planted area at the time of replanting would not be replanted and the | |

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| | | company carried out river border management in accordance with the Best Management Practice of river borders. | |
|-------|---|--|----------|
| 7.8.3 | Mill effluent is managed according to applicable regulations. The quality of mill effluent discharged, especially BOD (Biochemical Oxygen Demand) | In this CAV 2.3 there are no changes in effluent treatment. | Complied |
| | is monitored in accordance with applicable regulations. - Minor compliance - | Buatan II POM has 11 ponds in effluent treatment system (WWTP), which consists of Colling Pond, Primary Anaerobic Pond, Secondary Anaerobic Pond, Acidification Pond, and Buffering Pond. Procedure of WWTP operation available in Mill Policy Manual (MPM) dated 1 February 2013, chapter AA-MPM-OP-1400.13-R1. | |
| | | Mill holds permit to discharge wastewater into land application from local authority through Decree number KTPS.660/BLH/781/2014, issued on 10 September 2014 valid for 5 years. Total area of land application covers 1,137 ha at Block B, C, D, E, F. This license has been extended based on Decree Number : 503/DPMPTSP-LA/2019/05 dated 29 August 2019 and valid for 5 years. | |
| | | According to effluent monitoring data, all mill effluents are used for land application. Mill holds permit to discharge wastewater into land application from local authority. | |
| | | As required by LA permit, Mill conducts monthly check on discharged effluent in cooperation with accredited Laboratory (PT ITEC Solution Indonesia). According to recent testing result, BOD level of applied effluent has met the applicable threshold of KepmenLH No.28/2003 regarding BOD limits of effluent discharge for land application. The level is maintained consistently less than 5,000 mg/L and debit <600 m3 per day. | |
| | | Based on result of monitoring January – June 2024 and also July – December 2023 shown comply with legal requirement "PermenLHK No P.68/Setjen/Kum1/8/2016". | |
| | | Based on the results of field observations in the Land Application area, it is known that the location of the liquid waste application on the land is in accordance with the location stated in the Land Application permit, | |

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| f water for palm oil pr t for 2023 (Jan-Dec) v tant. The complete re in the following table – December 2023 iod FFB (tonnes) 20,847 | which is recapitulated recording of water us le: Water Usage (m ³) 14,174 | every month by the se per ton of FFB is Ratio (m ³ /ton FFB) 0.68 | Complied |
|--|---|--|--|
| iod FFB (tonnes 20,847 | 5) (m³) 14,174 | (m ³ /ton FFB) 0.68 | |
| iod (tonnes 20,847 | 5) (m³) 14,174 | (m ³ /ton FFB) 0.68 | |
| | | | |
| 10.047 | 12,022 | | |
| / 19,047 | 13,032 | 0.68 | |
| 20,674 | 14,068 | 0.68 | |
| 17,881 | 12,291 | 0.69 | |
| 24,501 | | 0.66 | |
| 19,331 | | 0.63 | |
| 22,237 | | 0.57 | |
| | | | |
| | , | | |
| | | | |
| | | | |
| | | | |
| er าb | t 23,413 nber 19,950 er 20,299 nber 20,408 nber 19,296 | t 23,413 12,412 nber 19,950 10,439 er 20,299 11,170 nber 20,408 9,805 nber 19,296 10,243 | t23,41312,4120.53nber19,95010,4390.52er20,29911,1700.55nber20,4089,8050.48nber19,29610,2430.53 |

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| | | F | Period | FFB (tonnes) | Water Usage (m ³) | Ratio (m ³ /ton FFB) | |
|------------|---|---|---|------------------|----------------------------------|------------------------------------|--|
| | | Janua | ary | 18,097 | 11,868 | 0.66 | |
| | | Febru | Jary | 15,859 | 9,862 | 0.62 | |
| | | March | h | 16,169 | 11,926 | 0.74 | |
| | | April | | 19,551 | 13,294 | 0.68 | |
| | | May | | 15,207 | 10,895 | 0.72 | |
| | | June | | 14,267 | 11,631 | 0.82 | |
| | | TOTA | AL. | 124,778 | 69,476 | 0.56 | |
| Criteria 7 | 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimise | month | • • | so show proof c | of payment for sur | face water for each | |
| 7.9.1 | Plans to increase the efficiency of fossil fuel use and to optimize renewable energy are available, monitored and documented. Minor compliance - | of foss shown renewa are con operat | To improving efficiency of the use of fossil fuels such monitoring on use of fossil fuels. Fossil fuel records was maintenance and the trends shown. Energy use records include accurate measurements of renewable energy use per ton of FFB processed. All the shell and fiber are consumed internally as boiler fuel. Fossil fuel usage is recorded for operational purpose, including the efficiency analysis. Records of EFB and shell in 2023 (January – December) | | | | |
| | | No | By-product | Amount (Ton) | Use for | | |
| | | 1 | EFB | 41,262 | Boiler fuel | | |
| | | 2 | Shell | 2,424.47 | Boiler fuel | | |
| | | Recorc | ls of EFB and | shell in 2024 (1 | January – Junel) | | |

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| | | No | By-product | Amount (Ton) | Use for | | |
|----------|--|--|---|--|--|---|------------|
| | | 1 | EFB | 15,204 | Boiler fuel | | |
| | | 2 | Shell | 782.91 | Boiler fuel | | |
| | | Fossil | fuel consumpti | on in 2024 (J | anuary – June) | | |
| | | No | Year | Fuels (ltr) | Use for | | |
| | | 1 | Estate | 64,465 | Operational activities | | |
| | | 2 | Mill | 24,232 | Operational activities | | |
| | | | | | | | |
| | | | | | | | |
| | | • | | | | | |
| to minim | 7.10: Plans to reduce pollution and emissions, including greenhouse gases is ise GHG emissions. (C) GHG emissions for the unit of certification are identified and assessed. | | | | | · | |
| | | There PT Int source | are no change i Indosawit Su s and pollution | s regarding G Ibur – Buatar I under docum | Hand monitored and new HG identification and red In II POM has identified to thent of "Enviromental Asp an) year 2024". | luction plan the emission | ts are des |
| to minim | ise GHG emissions. (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. | There PT Int source (Evalue Identif Estate effluer | are no change i Indosawit Su is and pollution asi Aspek-Dam fication of gree and Smallhold nt from mill v | s regarding G Ibur – Buatar I under docum pak Lingkung Inhouse gas (Iers consist of vastewater, p | HG identification and reduning the second seco | luction plan the emission pect-Impacts both of Mill, d generator, | |

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| | | conducts periodic generator maintenance and perform quality measurement of exhaust emissions each semester to ensure air quality is comply with standard regulation. | |
|--------|--|---|----------|
| | | Scheme Smallholder: | |
| | | Manager of Kebun Plasma Buatan has prepared the list significant pollutants and identify sources of emissions, presented in "Identifikasi Sumber Polusi di Perkebunan Petani Kebun Plasma Buatan PT Inti Indosawit Subur 2024". List of significant pollutant such as emission from FFB transportation, water pollutant from fertilizing and spraying activity, emission from generator usage. | |
| | | The auditor team has verified the GHG palm that has been carried out by the company. Based on the verification results, it is known that the GHG palm input data is in accordance with the actual conditions. This is evidenced by the results of verification of the amount of FFB production from Estate and scheme smallholder, as well as the area of HCV | |
| 7.10.2 | (C) Since 2014, an estimate of carbon stocks in the proposed development area has been carried out along with potential sources of emissions that can occur directly as a result of the development and plans to minimize these emissions are prepared and implemented (following the RSPO GHG Assessment Procedure for New Development). Critical (Major) compliance - | Based on the AMDAL document (013/ANDAL/BA/V/1995) and DPPL Document (KPTS.975/X/2009) and historical documents of plantation land use such as maps and other company documents, planting activities at scope certification began in 1988 and were completed in 1991. Until the surveillance assessment activities were implemented, there were no new planting activities or new land clearing above 15 November 2018. | Complied |
| 7.10.3 | (C) Other significant pollutant identification results are available and plans to reduce or minimize them are implemented and monitored. - Critical (Major) compliance - | Based on document review and interviews with company representatives, it was found that there were no new developments. The company has identified sources of pollution in the mills and estates, the documents inform the sources (stations/activities), sources of pollution and emissions, impacts (humans, work equipment, environment) and impact control. For example, from the boiler it produces boiler ash, | Complied |

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| steam and chemical pollution, from the engine room it produces pollution in the form of noise. Efforts to reduce pollutants carried out by the company include: • Monitoring air quality and emissions from boilers and generators • Manage POME in WWTPs before use in plantations • Utilizing POME for Methane Capture (Biogas) which generates electrical energy. • Perform regular machine maintenance. • Use of fibre and shells in Mills to reduce diesel fuel. The company has tested emissions from boilers and generators, as well as ambient air quality which was carried out in semesters 2 of 2023 by the PT ITEC Solution Indonesia (LP-894-IDN). Based on the results of the document review, it is known that the results of the excuration dut are in accordance with the provisions set by the Government (<i>Peraturan Menteri Lingkungan Hidup Do. OT Tahun 2007 and Peraturan Menteri Lingkungan Hidup Do. OT Tahun 2007 and Peraturan Menteri Lingkungan Hidup dan Kehutanan Republik Indonesia No. 11 Tahun 2021). • Utilization of palm oil from drain tanks at oil clarification and pickling stations in empty containers and condensate to reduce the loss of palm oil as waste. • Utilization of palm oil from drain tanks at oil clarification and pickling stations in empty containers and condensate to reduce the loss of palm oil as waste. • Use of fibre and shells for boiler fuel as a substitute for fossil fuels • Conduct environmental emission testing to determine repair schedule • Prohibition of burning waste for residential areas. • Planting trees that are useful for capturing carbon gas produced from fractories </i> | | |
|---|--|--|
| Monitoring air quality and emissions from boilers and generators Manage POME in WWTPs before use in plantations Utilizing POME for Methane Capture (Biogas) which generates electrical energy. Perform regular machine maintenance. Use of fibre and shells in Mills to reduce diesel fuel. The company has tested emissions from boilers and generators, as well as ambient air quality which was carried out in semesters 2 of 2023 by the PT ITEC Solution Indonesia (LP-894-IDN). Based on the results of the document review, it is known that the results of the document review, it is known that the results of the document review, it is known that the results of the document review, it is known that the group of the Government (<i>Peraturan Menteri Lingkungan Hidup dan Kehutanan Republik Indonesia No. 11 Tahun 2021</i>). The company also has mitigation as an effort to reduce GHG emissions, such as: Utilization of palm oil from drain tanks at oil clarification and picking stations in empty containers and condensate to reduce the loss of palm oil as waste. Use of fibre and shells for boiler fuel as a substitute for fossil fuels Conduct environmental emission testing to determine repair schedule Prohibition of burning waste for residential areas. Planting trees that are useful for capturing carbon gas produced | | |
| Manage POME in WWTPs before use in plantations Utilizing POME for Methane Capture (Biogas) which generates electrical energy. Perform regular machine maintenance. Use of fibre and shells in Mills to reduce diesel fuel. The company has tested emissions from boilers and generators, as well as ambient air quality which was carried out in semesters 2 of 2023 by the PT TEC Solution Indonesia (UP-894-IDN). Based on the results of the document review, it is known that the results of the tests carried out are in accordance with the provisions set by the Government (<i>Peraturan Menteri Lingkungan Hidup Van Hidup Van Tahun 2021</i>). The company also has mitigation as an effort to reduce GHG emissions, such as: Utilization of palm oil from drain tanks at oil clarification and picking stations in empty containers and condensate to reduce the loss of palm oil as waste. Use of fibre and shells for boiler fuel as a substitute for fossil fuels Conduct environmental emission testing to determine repair schedule Prohibition of burning waste for residential areas. Planting trees that are useful for capturing carbon gas produced | Efforts to reduce pollutants carried out by the company include: | |
| Utilizing POME for Methane Capture (Biogas) which generates electrical energy. Perform regular machine maintenance. Use of fibre and shells in Mills to reduce diesel fuel. The company has tested emissions from boilers and generators, as well as ambient air quality which was carried out in semesters 2 of 2023 by the PT ITEC Solution Indonesia (LP-894-IDN). Based on the results of the document review, it is known that the results of the document review, it is known that the results of the document review, it is known that the results of the document review, it is known that the results of the document review, it is known that the results of the document review, it is known that the results of the document (<i>Peraturan Menteri Lingkungan Hidup No. 07 Tahun 2007 and Peraturan Menteri Lingkungan Hidup No. 07 Tahun 2007 and Peraturan Menteri Lingkungan Hidup an Kehutanan Republik Indonesia No. 11 Tahun 2022)</i>. The company also has mitigation as an effort to reduce GHG emissions, such as: Utilization of palm oil from drain tanks at oil clarification and picking stations in empty containers and condensate to reduce the loss of palm oil as waste. Use of fibre and shells for boiler fuel as a substitute for fossil fuels Conduct environmental emission testing to determine repair schedule Prohibition of burning waste for residential areas. Planting trees that are useful for capturing carbon gas produced | Monitoring air quality and emissions from boilers and generators | |
| electrical energy. Perform regular machine maintenance. Use of fibre and shells in Mills to reduce diesel fuel. The company has tested emissions from boilers and generators, as well as ambient air quality which was carried out in semesters 2 of 2023 by the PT ITEC Solution Indonesia (LP-894-IDN). Based on the results of the document review, it is known that the results of the tests carried out are in accordance with the provisions set by the Government (<i>Peraturan Menteri Lingkungan Hidup No. 07 Tahun 2007 and Peraturan Menteri Lingkungan Hidup dan Kehutanan Republik Indonesia No. 11 Tahun 2021</i>). The company also has mitigation as an effort to reduce GHG emissions, such as: Utilization of palm oil from drain tanks at oil clarification and picking stations in empty containers and condensate to reduce the loss of palm oil as waste. Use of fibre and shells for boiler fuel as a substitute for fossil fuels Conduct environmental emission testing to determine repair schedule Prohibition of burning waste for residential areas. Planting trees that are useful for capturing carbon gas produced | Manage POME in WWTPs before use in plantations | |
| Use of fibre and shells in Mills to reduce diesel fuel. The company has tested emissions from boilers and generators, as well as ambient air quality which was carried out in semesters 2 of 2023 by the PT ITEC Solution Indonesia (LP-894-IDN). Based on the results of the document review, it is known that the results of the tests carried out are in accordance with the provisions set by the Government (<i>Peraturan Menteri Lingkungan Hidup Aon OT Tahun 2007 and Peraturan Menteri Lingkungan Hidup dan Kehutanan Republik Indonesia No. 11 Tahun 2021</i>). The company also has mitigation as an effort to reduce GHG emissions, such as: Utilization of palm oil from drain tanks at oil clarification and picking stations in empty containers and condensate to reduce the loss of palm oil as waste. Use of fibre and shells for boiler fuel as a substitute for fossil fuels Conduct environmental emission testing to determine repair schedule Prohibition of burning waste for residential areas. Planting trees that are useful for capturing carbon gas produced | | |
| The company has tested emissions from boilers and generators, as well as ambient air quality which was carried out in semesters 2 of 2023 by the PT ITEC Solution Indonesia (LP-894-IDN). Based on the results of the document review, it is known that the results of the tests carried out are in accordance with the provisions set by the Government (<i>Peraturan Menteri Lingkungan Hidup No. 07 Tahun 2007 and Peraturan Menteri Lingkungan Hidup No. 07 Tahun 2007 and Peraturan Menteri Lingkungan Hidup dan Kehutanan Republik Indonesia No. 11 Tahun 2021).</i> The company also has mitigation as an effort to reduce GHG emissions, such as: Utilization of palm oil from drain tanks at oil clarification and picking stations in empty containers and condensate to reduce the loss of palm oil as waste. Use of fibre and shells for boiler fuel as a substitute for fossil fuels Conduct environmental emission testing to determine repair schedule Prohibition of burning waste for residential areas. Planting trees that are useful for capturing carbon gas produced | Perform regular machine maintenance. | |
| as ambient air quality which was carried out in semesters 2 of 2023 by the PT ITEC Solution Indonesia (LP-894-IDN). Based on the results of the document review, it is known that the results of the tests carried out are in accordance with the provisions set by the Government (<i>Peraturan</i> <i>Menteri Lingkungan Hidup No. 07 Tahun 2007 and Peraturan Menteri Lingkungan Hidup dan Kehutanan Republik Indonesia No. 11 Tahun 2021</i>). The company also has mitigation as an effort to reduce GHG emissions, such as: Utilization of palm oil from drain tanks at oil clarification and picking stations in empty containers and condensate to reduce the loss of palm oil as waste. Use of fibre and shells for boiler fuel as a substitute for fossil fuels Conduct environmental emission testing to determine repair schedule Prohibition of burning waste for residential areas. Planting trees that are useful for capturing carbon gas produced | Use of fibre and shells in Mills to reduce diesel fuel. | |
| such as: Utilization of palm oil from drain tanks at oil clarification and picking stations in empty containers and condensate to reduce the loss of palm oil as waste. Use of fibre and shells for boiler fuel as a substitute for fossil fuels Conduct environmental emission testing to determine repair schedule Prohibition of burning waste for residential areas. Planting trees that are useful for capturing carbon gas produced | as ambient air quality which was carried out in semesters 2 of 2023 by the PT ITEC Solution Indonesia (LP-894-IDN). Based on the results of the document review, it is known that the results of the tests carried out are in accordance with the provisions set by the Government (<i>Peraturan</i> <i>Menteri Lingkungan Hidup No. 07 Tahun 2007 and Peraturan Menteri</i> <i>Lingkungan Hidup dan Kehutanan Republik Indonesia No. 11 Tahun</i> | |
| stations in empty containers and condensate to reduce the loss of palm oil as waste. Use of fibre and shells for boiler fuel as a substitute for fossil fuels Conduct environmental emission testing to determine repair schedule Prohibition of burning waste for residential areas. Planting trees that are useful for capturing carbon gas produced | | |
| Conduct environmental emission testing to determine repair schedule Prohibition of burning waste for residential areas. Planting trees that are useful for capturing carbon gas produced | stations in empty containers and condensate to reduce the loss of | |
| schedule Prohibition of burning waste for residential areas. Planting trees that are useful for capturing carbon gas produced | Use of fibre and shells for boiler fuel as a substitute for fossil fuels | |
| Planting trees that are useful for capturing carbon gas produced | | |
| | Prohibition of burning waste for residential areas. | |
| | | |

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| | 1 | | |
|----------|---|---|----------|
| | | Perform regular vehicle repairs and monitoring. | |
| Criteria | 7.11: Fire is not used for preparing land and is prevented in the managed a | irea. | |
| 7.11.1 | (C) Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance - | Based on the results of document verification and the results of field visits during the audit activity, it was found that there were no new land clearing and only replanting activities carried out by the company. In addition, there were no traces of burning on the plantation land and there was a warning sign prohibiting burning land. | Complied |
| 7.11.2 | The unit of certification establishes fire prevention and control measures for lands that are directly managed by the unit of certification. - Minor compliance - | In determining land fire prevention and control measures, the company carries out several activities, namely: Rainfall monitoring and establishment of a fire hazard rating system every month. Monthly monitoring of hotspots. Implementation of basic fire introduction training o The company has an emergency response team to handle fire emergencies. The company already has an emergency response team for each estate and factory. Have facilities and infrastructure for emergency response prevention and management of land fires, for examples: Flapper, fine rake, chainsaw, water pomp, megaphone, first aid kit, helmet, wear pack, shovel, etc.) Make reports related to fire monitoring, prevention and control every semester and send them to related agencies, for example "<i>Laporan Pencegahan Pencemaran dan atau Kerusakan Lingkungan Hidup Yang Berkaitan Dengan Kebakaran Lahan SM II 2023 PT Inti Indosawit Subur – Group Buatan"</i> sent to Environmental Agency of Pelalawan Regency. | Complied |



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| 7.11.3 | The unit of certification engages stakeholders in adjacent locations for fire prevention and control measures. - Minor compliance - | The policy has communicated to all smallholder remember and local community to engages stakeholders in adjacent locations for fire prevention and control measures, the las socialization has carried out on 19 February 2024. | |
|-----------|--|---|--|
| | | 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" tahun 2016. In the mechanism explained that replanting must be conducted mechanicaly without burning. | |
| | 7.12: Land clearing does not cause deforestation or damage any area requictly and HCS forests in the managed area are identified and protected or en | ired to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HC nanced. | |
| PROCED | URAL NOTE for 7.12: | | |
| | Principles and Criteria 2018 include new requirements to ensure the effective Carbon Stock Approach (HCSA) Approach Guide into the revised standard. | e contribution of the RSPO in stopping deforestation. This will be achieved by incorporati | |
| | The RSPO ToC also encourages RSPO to commit to balancing between sustainable livelihoods and reducing poverty with the need to conserve, protect and improve the quality of ecosystems. | | |
| | High Forest Cover Countries (HFCC) are in dire need of economic opportunities that can help people choose their own path in carrying out development, while at the same time providing social and economic benefits and safeguards. | | |
| | Procedures will be developed that are adapted to support the development of sustainable palm oil by indigenous peoples and local communities who have legal or customary rights. The procedure will apply in certain HFCC countries and in the High Forest Cover Landscape (HFCL) within it. | | |
| The devel | The development of this procedure will be guided by the No Deforestation Joint Steering Group (NDJSG) between the RSPO and HCSA members. In HFCC | | |
| | countries, RSPO will work with governments, communities and other stakeholders to develop this procedure through participatory processes at national and regional levels. The duration of this activity is specified in the Terms of Reference for NDJSG and is publicly available. | | |
| 7.12.1 | (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. | There is no new planting after November 2005 within certified area of PT Inti Indosawit Subur – Buatan Estate and Scheme Smallholder. Buatan Estate has planted since 1988 – 1991 while Buatan Plasma has planted since 1988 - 1993. Currently, replanting activities are still in | |

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| | Historical analysis of Land Use Change Analysis (LUCA) is carried out before any new land clearing, in accordance with the RSPO LUCA Guidance document (see indicator 7.12.2). - Critical (Major) compliance - | progress. Replanting has been started since 2014 – 2023 and still continue until 2024. | |
|--------|---|---|----------|
| 7.12.2 | (C) HCV and HCS forests, and other conservation areas are identified as follows: - Critical (Major) compliance - | During this audit ASA 2.3 there is no change in the HCV assessment since there is no change in the scope of plantation and no expansion or activity change. | Complied |
| | 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. | PT Inti Indosawit Subur – Group Buatan has conducted the HCV identification in coordination with "Fakultas Kehutanan Institut Pertanian Bogor" on March – April 2009, under "Laporan Final Kajian Penuh Identifikasi dan Analisis Keberadaan High Conservation Value di Areal PT Inti Indosawit Subur, Kebun Buatan Provinsi Riau". The HCV assessment conducted based on "Panduan Kawasan Bernilai Konservasi Tinggi di Indonesia", issued by Konsorsium Revisi HCV Toolkit Indonesia dated 12/07/2008. | |
| | | Based on HCV identification total HCV area identified was 55.56 ha in Buatan Estate and Simpang Perak Estate. | |
| | | Simpang Perak Estate previously was include in Buatan Estate (Division IV, V, VI and VII). Curently those division was separated from Buatan Estate (since 2021) and has its own estate namely Simpang Perak estate however the size of HCV area are remain same and not change. Division I, II and III as supply base Buatan I POM and Simpang Perak Estate Division (<i>previously was division IV, V, VI and VII currently changing to become division I - IV</i>) as supply base Buatan II POM. So that the HCV area in Simpang Perak Estate as supply base Buatan II POM was 27.78 ha. HCV identified in Buatan Estate & Simpang Perak Estate consist of: | |
| | | HCV 1.1, 1.2 and 4.1: Riparian zone Kerinci Besar River (38.9 Ha); HCV 1.1, 1.2 and 4.1: Riparian zone Laniago River (4.50 Ha); | |

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| 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 | Therefore no recommendation for wildlife corridor. | |
|---|---|-------------------|
| 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 land clearing or planting after November 2018 within certified area of PT Inti Indosawit Subur – Buatan Estate and Scheme Smallholder. Buatan Estate has planted since 1988 – 1991 while Buatan scheme smallholder has planted since 1988 - 1993. Currently, replanting activities are still in progress. Replanting has been started since 2014 – 2023 and still continue until 2024. HCV assessment has been conducted in the existing plantation since 2009 according to explanation in indicator 7.12.2.a above. | |
| 7.12.3 (C) In High Forest Cover Landscapes (HFCLs) within HFCCs, a specific procedure will apply for legacy cases and development by indigenous peoples and local communities with legal or customary rights, taking into consideration regional and national multi-stakeholder processes. Until this procedure is developed and endorsed, 7.12.2 applies. Critical (Major) compliance - | Based on HCV assessment report and field observation confirmed that there is no High Forest Cover Landscapes (HFCLs) within area of PT Inti Indosawit Subur – Buatan Estate. Company was located in another purpose area and not in forest area. This indicator not applicable. | Not Applicable |

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| 7.12.4 | (C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An Integrated management plans to protect and/or enhance HCV and HCS forests, peatland and other conservation areas 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) Critical (Major) compliance - | started planting in 1988 – 1991 and scheme smallholder planting since 1988 - 1993, no any new planting area/developing area since November 2005. Replanting has been started since 2014 – 2023 and still continue until 2024. PT Inti Indosawit Subur – Buatan Estate has develop the Conservation Management Plan 2023. Evidence Continous monitoring documentation and report regarding the status of RTE species and HCV presented in "Laporan Monitoring tumbuhan dan Satwaliar PT Inti Indosawit Subur, Kebun Buatan" Periode January – June 2023 and Juli – December 2023". Monitoring documentation such as: "Daftar Temuan Satwa liar di Areal kebun" contain information regarding result of wildlife and RTE species monitoring, "Tabel Monitoring Kerusakan Kawasan Lindung" contain information regarding result of HCV area disturbance, and HCV condition monitoring such as illegal hunting, HCV area disturbance, and HCV condition. Latest monitoring both RTE species and HCV area conducted on December 2023. Sample seen: Wildlife monitoring in Block F89b, Block A90c, Riparian of laniago river, Riparian of Kerinci Kanan river, Block 52, found presence of animal such as: <i>Aethopyga siparaja, Halcyon pileata, Centropus sinensis, Naja sumatrana, Macaca fascicularis, Tupaia tana.</i> Monthly monitoring of HCV area condition and animal species also performed by Foreman HCV (Adi Surya P) and each Foreman Afdeling, animal presence recorded in "Daftar Temuan Satwa Liar. | Complied |
|--------|---|--|----------|
| | | implementation reported each semester in "laporan Monitoring tumbuhan dan Satwaliar PT Inti Indosawit Subur, Kebun Buatan". Evaluation result and recommendation of management and monitoring contain in the report. This recommendation give the feedback and | |

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| improvement to conservation management plan. HCV socialization to Buatan II POM and Simpang Perak Estate has been conducted. |
|--|
| Company also has implemented appropriate sanction disciplinary measures to any individual working for the company who is found to capture, harm, collect or kill these species. Sanction and process based on UU No. 5 tahun 1990. Based on interview with worker representative and field workers – workers have understand protection of plant and animal. The workers also aware of company policy prohibits hunting, raising and killing protected animal. |
| Scheme Smallholder: |
| Each KUD has appointed person in charge to monitor the RTE species presence in smallholder plantation area |
| KUD Bhakti Mandiri: Surat Keputusan Pengurus KUD Bhaki Mandiri Nomor: /Kpts/KUD BM/VII/2018 dated 10 July 2018 Tentang Penunjukan atau Pengangkatan Petugas Perlindungan dan Pengawasan Satwa Liar dan Tumbuhan Dilindungi. apointed person: Jumari. |
| KUD Jaya Makmur: Surat Keputusan Pengurus KUD Jaya Makmur Nomor:/Kpts/KUD JM/VII/2018 dated 10 July 2028 Tentang Penunjukan atau Pengangkatan Petugas Perlindungan dan Pengawasan Satwa Liar dan Tumbuhan Dilindungi. apointed person: Mahyun. |
| KUD Sumber Rejeki: Surat Keputusan Pengurus KUD Sumber Rejeki Nomor:/Kpts/VII/2019 dated 13 July 2019 Tentang Penunjukan atau Pengangkatan Petugas Perlindungan dan Pengawasan Satwa Liar dan Tumbuhan Dilindungi. apointed person: Sumarlan. |
| KUD Sejahtera: Surat Keputusan Pengurus KUD Sejahtera Nomor:01/Kpts/V/2018 dated 20 May 2018 Tentang Penunjukan |

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| | | atau Pengangkatan Petugas Perlindungan dan Pengawasan Satwa Liar dan Tumbuhan Dilindungi. apointed person: Agusmiran. Monitoring for RTE species performed each month by PIC. Result of monitoring presented in "Daftar Temuan Satwa Yang Dilindungi Tahun 2023". During January – December 2023, shown that in KUD Bhakti Mandiri, KUD Jaya Makmur, KUD Sumber Rejeki and KUD Sejahtera there were presence of animal such as: Kobra (<i>Naja sumatrana</i>), Kucing hutan (<i>Prionailurus bengalensis</i>), Biawak (<i>Varanus salvator</i>), Elang Tikus (<i>Elanus caeruleus</i>), Tupai tanah (<i>Tupaia sp</i>), Burung Madu (<i>Nectarinia jugularis</i>) and Cekakak Belukar (<i>Halcyon smyrnensis</i>). | |
|--------|---|--|----------|
| 7.12.5 | Where rights of local communities have been identified in HCV areas and HCS forest after 15 November 2018, peatland and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas. - Minor compliance - | There is no new land clearing or planting after November 2018 within certified area of PT Inti Indosawit Subur – Buatan Estate and Buatan scheme smallholder. Simpang Perak Estate has planted since 1988 – 1991 while Buatan scheme smallholder has planted since 1988 - 1993. Currently, replanting activities are still in progress. Replanting has been started since 2014 – 2023 and still continue until 2024. HCV assessment has been conducted in the existing plantation since 2009 according to explanation in indicator 7.12.2.a above. Based on HCV assessment report there is no HCV area identified within local communities land right, all HCV area identified were within company concession (HGU). | Complied |
| 7.12.6 | All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species. | 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. Company has monitor the RTE species and HCV area regularly. | Complied |

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| | - Minor compliance - | 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). | |
|--------|--|--|----------|
| | | 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, Peraturan Menteri Lingkungan Hidup dan Kehutanan No P.106/MENLHK/SETJEN/KUM.1/12/2018 Tahun 2018 about List of protected plan and wildlife, Kepres #32/1990, and PP #26/2008. | |
| | | Company also has implemented appropriate sanction disciplinary measures to any individual working for the company who is found to capture, harm, collect or kill these species. Sanction and process based on UU No. 5 tahun 1990. Based on interview with worker representative and field workers – workers have understand protection of plant and animal. The workers also aware of company policy prohibits hunting, raising and killing protected animal. | |
| | | PT. Inti Indosawit Subur – Buatan II POM and Estate has a program to socialize the status of protected, rare, threatened or endangered (RTE) to all workers, it was also programed each year as per "Conservation Management Plan". Socialization has been conducted through master morning in each division by field assistant. Company also provides signboard regarding HCV protection and RTE species protection in the strategic place as a campaign to give awareness to the workers/people. | |
| 7.12.7 | The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan. - Minor compliance - | There is no new land clearing or planting after November 2018 within certified area of PT Inti Indosawit Subur – Buatan Estate and Buatan Plasma. Buatan Estate has planted since 1988 – 1991 while Buatan Plasma has planted since 1988 - 1993. Currently, replanting activities are still in progress. Replanting has been started since 2014 – 2023 and still continue until 2024. | Complied |

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| | | HCV assessment has been conducted in the existing plantation since 2009 according to explanation in indicator 7.12.2.a above. HCV and RTE species management and monitoring plan has been develop as per conservation management plan updated in January 2023. HCV and wildlife/animal monitoring continuously conducted in a regular basis. Secondary monitoring conducted each month and primary monitoring of animal/wildlife performed by HCV/Sustainability officer and field workers, result of monitoring presented in "LAPORAN MONITORING TUMBUHAN DAN SATWA LIAR (HCV)". 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. Result of monitoring gives the feedback into the management plan improvement. The results from monitoring of wildlife, environmental, and socio-cultural services gives feedback advice and recommendations to the management plan. | |
|--------|---|---|----------|
| 7.12.8 | (C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV- HCSA assessment since 15 November 2018, the Remediation and Compensation Procedures (RaCP) applies. Critical (Major) compliance - | There is no new land clearing or planting after November 2018 within certified area of PT Inti Indosawit Subur – Buatan Group. Simpang Perak Estate has planted since 1988 – 1991 while Buatan Plasma has planted since 1988 - 1993. Currently, replanting activities are still in progress. Replanting has been started since 2014 – 2023 and still continue until 2024. | Complied |

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| HCV assessment has been conducted in the existing plantation since | |
|--|--|
| 2009 according to explanation in indicator 7.12.2.a above. | |

Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **[2023]** for **[PT. Inti Indosawit Subur – Buatan II Palm Oil 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. Inti Indosawit Subur – Buatan II Palm Oil Mill** and supply base are as following:

Extraction

| Emission per product | tCO ₂ e/tProduct |
|----------------------|-----------------------------|
| СРО | -0.26 |
| РКО | -0.26 |

| r | Land Use | |
|----|----------|--|
| | | |
| .6 | KER | |
| .6 | OER | |
| | | |

| Production | t/yr |
|--------------|------------|
| FFB Process | 175,651.00 |
| CPO Produced | 31973 |
| PKO Produced | 9769 |

| Land Use | Ha | |
|-----------------------------|-------|----------|
| OP Planted Area | | 3,621.00 |
| OP Planted on peat | | 0.00 |
| Conservation (forested) | | 0.00 |
| Conservation (non-forested) | | 0.00 |
| | Total | 3,621.00 |

Summary of Field Emission and Sink

| | Own Crop* | | Group | | 3 rd Party | | Total | |
|--|-----------|----------------|---------|----------------|-----------------------|----------------|--------------------|----------------|
| | tCO2e | tCO2e / FFB | tCO2e | tCO2e / FFB | tCO ₂ e | tCO2e / FFB | tCO ₂ e | tCO2e / FFB |
| Emission | | | | | | | | |
| Land Conversion | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | |
| CO ₂ Emission from fertilizer | 0.00 | 0.00 | 910.12 | 0.02 | 0.00 | 0.00 | 910.12 | |
| NO ₂ Emission from peat | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | |
| NO ₂ Emission from fertilizer | 0.00 | 0.00 | 763.28 | 0.01 | 0.00 | 0.00 | 763.28 | |
| Fuel Consumption | 0.00 | 0.00 | 710.02 | 0.01 | 0.00 | 0.00 | 710.02 | |
| Peat Oxidation | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | |
| Sink | Sink | | | | | | | |
| Crop Sequestration | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | |
| Conservation Sequestration | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | |
| Total | 0.00 | 0.00 | 2383.41 | 0.04 | 4888.80 | 0.00 | 7272.21 | |

*Note: Includes both estates and smallholders

%

18.2 5.56



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Summary of Mill Emission and Credit

| | tCO ₂ e | tCO2e/tFFB |
|------------------------------|--------------------|------------|
| Emission | | |
| POME | 2983.93 | 0.02 |
| Fuel Consumption | 100.74 | 0.00 |
| Grid Electricity Utilization | 50.43 | 0.00 |
| Credit | | |
| Export of Grid Electricity | 0.00 | 0.00 |
| Sales of PKS | -20915.40 | -0.12 |
| Sales of EFB | -136.96 | 0.00 |
| Total | -17917.27 | -0.10 |

Summary of Kernel Crusher Emission and Credit (if applicable)

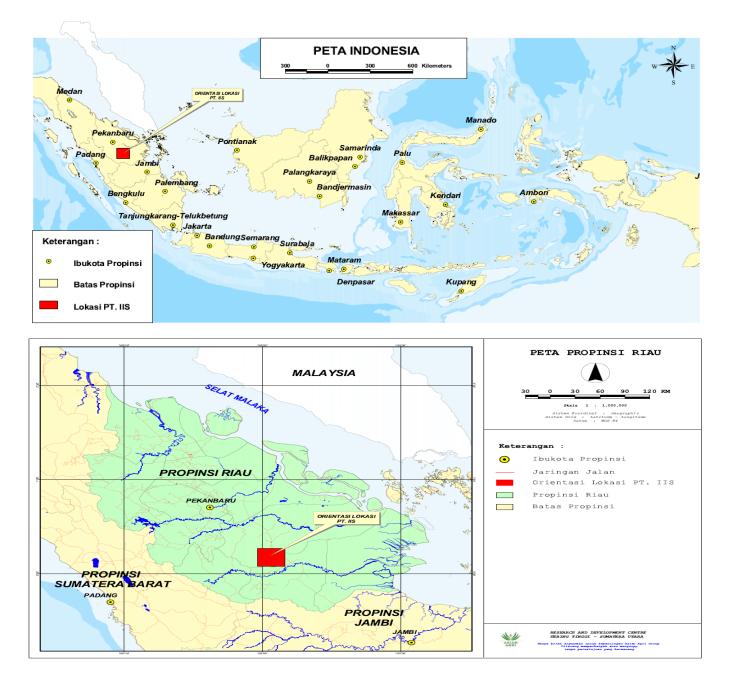
| Emissions | tCO2e |
|-------------------------|----------|
| PK from own mill | -9343.29 |
| PK from other source | 0.00 |
| Fuel Consumptions | 0.00 |
| Total Crusher emissions | -9343.29 |

*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 (%) 0 | | | | |
| Divert to methane captured (flaring) (%) | 0.68 | | | |
| Divert to methane captured (energy generation) (%) | 99.32 | | | |

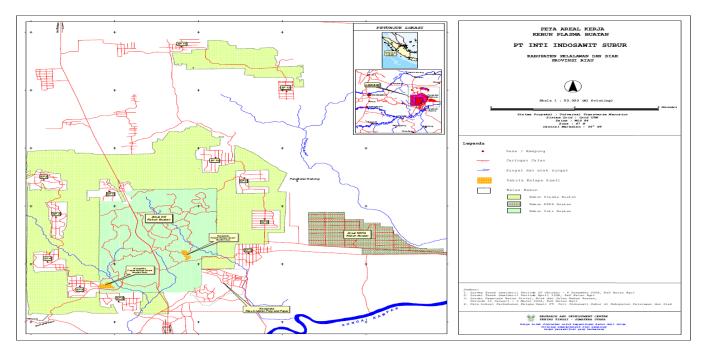
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Appendix C: Location Map of Certification Unit and Supply bases

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Appendix D: Estate Field Map



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Appendix E: List of Smallholder Registered and/or sampled

| Sampling Group | Current Certification | Scope Extension | Other: <i>Please specify</i> |
|---|--|-----------------|------------------------------|
| Risk Factor Applied | 1.2 (medium risk) | N/A | N/A |
| Justification of Risk Factor Applied | Groups are those where there is some geographical and socioeconomic. homogeneity (similarity) but it is not uniform across the | - | - |
| | Group. There is no replanting and or expansion, but the organization has a history of non-conformance. | | |
| Number of samples | 56 samples | - | - |
| Remarks | - | - | - |

| No | Name of farmer | Location | GPS Reference | | | Summary Ha) | Forecasted annual FFB | Date of joining | Smallholder ID |
|----|-----------------|-------------------|------------------|--------------------|--------|----------------|--------------------------|-----------------|-------------------|
| | | | Latitude (N) | Longitude (E) | · · · | Planted | Production | Johning | 10 |
| | | | | | Certif | Area | (MT) | | |
| | | | | | ied | / | (, | | |
| | | | | | Area | | | | |
| KU | D Makarti Sawit | | | | | | | | • |
| 1 | Sugeng | KUD Makarti Sawit | 0° 36' 56.806" N | 101° 51' 37.390" E | 2 | 2 | 17.59 | 1992 | 4868 |
| 2 | Bejo H | KUD Makarti Sawit | 0° 36' 57.656" N | 101° 51' 46.200" E | 2 | 2 | 17.59 | 1992 | 4871 |
| 3 | Busairi | KUD Makarti Sawit | 0° 36' 54.433" N | 101° 51' 46.219" E | 2 | 2 | 17.59 | 1992 | 4872 |
| 4 | Nion | KUD Makarti Sawit | 0° 36' 56.010" N | 101° 51' 51.026" E | 2 | 2 | 17.59 | 1992 | 4873 |
| 5 | Sumarno | KUD Makarti Sawit | 0° 36' 55.898" N | 101° 51' 54.249" E | 2 | 2 | 17.59 | 1992 | 4874 |
| 6 | Ngatno | KUD Makarti Sawit | 0° 36' 56.017" N | 101° 51' 57.313" E | 2 | 2 | 17.59 | 1992 | 4875 |
| 7 | Abas | KUD Makarti Sawit | 0° 36' 55.989" N | 101° 52' 0.467" E | 2 | 2 | 17.59 | 1992 | 4876 |
| 8 | Sahroni | KUD Makarti Sawit | 0° 37' 7.615" N | 101° 52' 14.058" E | 2 | 2 | 18.35 | 1992 | 4760 |
| 9 | Amir | KUD Makarti Sawit | 0° 37' 7.689" N | 101° 52' 19.436" E | 2 | 2 | 18.35 | 1992 | 4761 |
| 10 | Ngatemin | KUD Makarti Sawit | 0° 37' 7.832" N | 101° 52' 24.442" E | 2 | 2 | 18.35 | 1992 | 4762 |
| 11 | Suwarno | KUD Makarti Sawit | 0° 37' 8.047" N | 101° 52' 29.013" E | 2 | 2 | 18.35 | 1992 | 4763 |
| 12 | Mulyono | KUD Makarti Sawit | 0° 37' 2.619" N | 101° 52' 35.264" E | 2 | 2 | 18.35 | 1992 | 4860 |
| 13 | Yoyo | KUD Makarti Sawit | 0° 37' 2.658" N | 101° 52' 32.118" E | 2 | 2 | 18.35 | 1992 | 4861 |
| 14 | Sukardi | KUD Makarti Sawit | 0° 36' 56.208" N | 101° 52' 35.342" E | 2 | 2 | 18.35 | 1992 | 4888 |
| KU | D Mitra Usaha | | | | | • | | | |
| 1 | Dedi | KUD Mitra Usaha | 0° 32' 15.097" N | 101° 51' 15.501" E | 2 | 2 | 21.7 | 1991 | 3379 |
| 2 | Misrin | KUD Mitra Usaha | 0° 32' 15.089" N | 101° 51' 18.680" E | 2 | 2 | 21.7 | 1991 | 3380 |
| 3 | Suratin | KUD Mitra Usaha | 0° 32' 15.056" N | 101° 51' 21.824" E | 2 | 2 | 21.7 | 1991 | 3381 |
| 4 | Sartono | KUD Mitra Usaha | 0° 32' 21.479" N | 101° 51' 21.900" E | 2 | 2 | 21.7 | 1991 | 3358 |
| 5 | Samahudin | KUD Mitra Usaha | 0° 32' 14.953" N | 101° 51' 24.992" E | 2 | 2 | 21.7 | 1991 | 3382 |
| 6 | Samsuri | KUD Mitra Usaha | 0° 32' 15.068" N | 101° 51' 28.202" E | 2 | 2 | 21.9 | 1991 | 3383 |
| 7 | Ponimin | KUD Mitra Usaha | 0° 32' 15.174" N | 101° 51' 31.316" E | 2 | 2 | 21.9 | 1991 | 3384 |
| 8 | Juarno | KUD Mitra Usaha | 0° 32' 15.112" N | 101° 51' 34.464" E | 2 | 2 | 21.9 | 1991 | 3385 |
| 9 | Cholil | KUD Mitra Usaha | 0° 33' 3.774" N | 101° 52' 0.405" E | 2 | 2 | 21.9 | 1991 | 3157 |
| 10 | Maman Abdul | KUD Mitra Usaha | 0° 33' 1.136" N | 101° 51' 59.831" E | 2 | 2 | 21.9 | 1991 | 3158 |
| 11 | Julbasri | KUD Mitra Usaha | 0° 32' 58.562" N | 101° 52' 0.034" E | 2 | 2 | 21.9 | 1991 | 3159 |

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| No | Name of farmer | Location | GPS Reference | | | Summary Ha) | | Date of joining | Smallholder ID |
|------|-------------------------|-----------------|------------------|--------------------|------------------------|-----------------|--------------------|-----------------|-------------------|
| | | | Latitude (N) | Longitude (E) | Total Certif ied | Planted Area | Production (MT) | 5 0 | |
| | | · · · | | | Area | | | | |
| 12 | Edi Miswanto | KUD Mitra Usaha | 0° 32' 47.503" N | 101° 51' 56.584" E | 2 | 2 | 21.9 | 1991 | 3219 |
| | Amir | KUD Mitra Usaha | 0° 32' 47.506" N | 101° 51' 59.664" E | 2 | 2 | 21.9 | 1991 | 3218 |
| | Pirman | KUD Mitra Usaha | 0° 32' 47.560" N | 101° 52' 2.799" E | 2 | 2 | 21.9 | 1991 | 3217 |
| KU | D Tani Rukun | KUD Tani Dulum | 0° 27' 19.306" N | 101° 53' 31.274" E | 2 | 2 | 10.20 | 1001 | 4571 |
| 1 | Bustami Azizah | KUD Tani Rukun | 0°27 19.306 N | 101° 53 31.274 E | 2 | 2 | 18.39 | 1991 | 4571 |
| 2 | Pujio | KUD Tani Rukun | 0° 27' 19.354" N | 101° 53' 28.160" E | 2 | 2 | 18.39 | 1991 | 4572 |
| 3 | Tatyatul Azizah | KUD Tani Rukun | 0° 27' 19.244" N | 101° 53' 25.120" E | 2 | 2 | 18.39 | 1991 | 4573 |
| 4 | Ilham | KUD Tani Rukun | 0° 27' 43.666" N | 101° 53' 34.976" E | 2 | 2 | 20.75 | 1991 | 4520 |
| 5 | Wagimin | KUD Tani Rukun | 0° 27' 45.296" N | 101° 53' 31.163" E | 2 | 2 | 20.75 | 1991 | 4521 |
| 6 | Tamrin | KUD Tani Rukun | 0° 27' 45.215" N | 101° 53' 27.996" E | 2 | 2 | 20.75 | 1991 | 4522 |
| 7 | Karsiman | KUD Tani Rukun | 0° 27' 45.176" N | 101° 53' 24.930" E | 2 | 2 | 20.75 | 1991 | 4523 |
| 8 | Rustani | KUD Tani Rukun | 0° 27' 45.191" N | 101° 53' 21.736" E | 2 | 2 | 20.75 | 1991 | 4524 |
| 9 | Surtini | KUD Tani Rukun | 0° 28' 7.829" N | 101° 53' 55.142" E | 2 | 2 | 19.89 | 1991 | 4484 |
| 10 | Supirman | KUD Tani Rukun | 0° 28' 7.946" N | 101° 53' 57.964" E | 2 | 2 | 19.89 | 1991 | 4485 |
| 11 | Karmuji | KUD Tani Rukun | 0° 28' 7.745" N | 101° 54' 0.891" E | 2 | 2 | 19.89 | 1991 | 4486 |
| 12 | Sugito | KUD Tani Rukun | 0° 28' 1.784" N | 101° 53' 34.811" E | | 2 | 19.89 | 1992 | 4498 |
| 13 | Basyarudin | KUD Tani Rukun | 0° 28' 7.862" N | 101° 54' 13.316" E | 2 | 2 | 17.27 | 1992 | 4490 |
| 14 | Pujiana | KUD Tani Rukun | 0° 28' 7.972" N | 101° 54' 16.357" E | 2 | 2 | 17.27 | 1992 | 4491 |
| KU | <u>D Bhirawa Bakti</u> | | | | | | | | |
| 1 | Toyamin | Buana Bhakti | 0° 30' 39.687" N | 101° 48' 24.457" E | 2 | 2 | 7.51 | 1992 | 600 |
| 2 | Masdar | Buana Bhakti | 0° 30' 33.442" N | 101° 48' 33.898" E | 2 | 2 | 7.51 | 1992 | 610 |
| 3 | (M Simbolon) | Buana Bhakti | 0° 30' 33.266" N | 101° 48' 27.466" E | 2 | 2 | 7.51 | 1992 | 612 |
| 4 | Tariah | Buana Bhakti | 0° 30' 46.004" N | 101° 48' 33.934" E | 2 | 2 | 7.51 | 1992 | 590 |
| 5 | Sawao'en | Buana Bhakti | 0° 30' 46.012" N | 101° 48' 30.925" E | 2 | 2 | 7.51 | 1992 | 591 |
| 6 | Umar Sutisno | Buana Bhakti | 0° 31' 4.536" N | 101° 48' 14.840" E | 2 | 2 | 17.85 | 1992 | 539 |
| 7 | Sukiem | Buana Bhakti | 0° 31' 4.712" N | 101° 48' 17.897" E | 2 | 2 | 17.85 | 1992 | 540 |
| 8 | Chamsidik | Buana Bhakti | 0° 30' 58.373" N | 101° 48' 17.981" E | 2 | 2 | 17.85 | 1992 | 574 |
| 9 | Dahlan Sukaman | Buana Bhakti | 0° 30' 52.337" N | 101° 48' 18.049" E | 2 | 2 | 17.85 | 1992 | 577 |
| 10 | Madsalim | Buana Bhakti | 0° 30' 58.801" N | 101° 48' 30.646" E | 2 | 2 | 17.85 | 1992 | 570 |
| 11 | Sunarto Bin Suprapto | Buana Bhakti | 0° 30' 39.628" N | 101° 48' 21.202" E | 2 | 2 | 17.85 | 1992 | 599 |
| 12 | Anda Juanda | Buana Bhakti | 0° 30' 33.392" N | 101° 48' 30.675" E | 2 | 2 | 17.85 | 1992 | 611 |
| 13 | Sarna Bin Pulang | Buana Bhakti | 0° 30' 39.477" N | 101° 48' 30.860" E | 2 | 2 | 17.85 | 1992 | 602 |
| 14 | | Buana Bhakti | 0° 30' 39.675" N | 101° 48' 27.724" E | 2 | 2 | 17.85 | 1992 | 601 |
| | | | | ÷ | | 110 | 1.020.4 | | |
| NI - | - | | | Total | 112 | 112 | 1,028.4 | | |
| Note | 2 | | | | | | | | |
| - | | | | | | | | | |

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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 |
| LD50 | Lethal Dose for 50 sample |
| 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 |