

## 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: Jl Palembang Kav 35 – 37, Jakarta 10230, Indonesia

**Certification Unit:** 

#### PT Inti Indosawit Subur - Buatan I Palm Oil Mill

Location of Certification Unit:

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

Date of Final Report: 25/09/2024



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#### **Section 1: Scope of the Assessment**

1. Company Details					
Parent Company	PT. Inti Indosawit Subur				
RSPO Membership Number	1-0022-06-000-00	Membership	Approval Date	06/02/2006	
Address	JI Palembang Kav 35 – 37, Jaka	arta 10230, Ind	donesia		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	PT. Inti Indosawit Subur – Bu	ıatan I Palm O	il Mill		
Location / Address	Delik/Pangkalan Village, Pelal Indonesia	awan District,	Pelalawan Regency	, Riau Province,	
Website	www.asianagri.com				
Management Representative	Mr Ivan Novrizaldie E-mail Ivan novrizaldie@asianagri.com				
Telephone	(+62)21 - 2301119	Facsimile	(+62)21 - 230112	0	

2. Certification Information					
Certificate Number	RSPO 638918	Certificat	te Start Date	24/08/2021	
Date of First Certification	16/09/2010	Certificat	te Expiry Date	23/08/2026	
Scope of Certification	Production of Sustainable Cru	ıde Palm Oi	l (CPO) and Palm k	Cernel (PK)	
Visit Objectives	Determination of the con with audit criteria.	formity of t	the client's manage	ement system, or parts of it,	
	Evaluation of the ability o meets applicable statutor		•	ensure the client organization equirements.	
Assessment Cycle	<ul> <li>□ Pre Assessment (Choose an item.)</li> <li>□ Initial Assessment</li> <li>☑ Annual Surveillance Assessment (ASA 2_3)</li> <li>□ Recertification Assessment (Choose an item.)</li> <li>□ Scope Extension</li> </ul>				
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020  ☑ Indonesia National Interpretation 2020 of the RSPO P&C 2018				
<b>Supply Chain Module</b>	☐ 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)	☐ On-site	audit (Option AII)	☐ Remote audit (Option B)	



3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
ID05/65250	ISO 14001:2015	SGS	10/06/2026
EU-ISCC-Cert-DE100- 02045124	ISCC EU	SGS	02/02/2025
SGS-ID-ISPO-0033	ISPO	SGS	21/03/2029

4. Location(s) of Mill & Supply Bases					
Name	Location	GPS Co	ordinates		
(Mill / Supply Base / Group Manager / Smallholders)		Latitude	Longitude		
Buatan I Palm Oil Mill	Delik & Pangkalan Village, Pelalawan District, Pelalawan Regency, Riau	00° 26′ 04.00″ N	101° 49′ 30.00″ E		
Buatan Estate	Delik & Pangkalan Village, Pelalawan District, Pelalawan Regency, Riau	00° 30′ 37.00″ N	101° 49′ 06.00″ E		
KUD Bhakti Mandiri	Bukit Harapan Village, Kerinci Kanan District, Siak Regency, Riau	00° 29′ 16.00″ N	101° 47′ 47.20″ E		
KUD Jaya Makmur	Kumbara Utama Village, Kerinci Kanan District, Siak Regency, Riau	00° 29′ 56.80″ N	101° 47′ 31.40″ E		
KUD Sumber Rejeki	Bukit Agung Village, Kerinci Kanan District, Siak Regency, Riau	00° 25′ 50.30″ N	101° 48′ 49.60″ E		
KUD Sejahtera	Makmur Village, Kerinci Kanan District, Siak Regency, Riau	00° 25′ 28.90″ N	101° 50′ 07.50″ E		

5. Description of Supply Base						
New Planting Development	⊠ No		□ Yes			
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastruct & Other (ha)		Total Area (ha)	% of Planted
Buatan Estate	2,353.00	27.78	241.22		2,622.00	89.74
KUD Bhakti Mandiri (247 members)	918.00	0.00	0.00		918.00	100
KUD Jaya Makmur (231 members)	864.00	0.00	0.00		864.00	100
KUD Sumber Rejeki (259 members)	806.00	0.00	0.00		806.00	100



KUD Sejahtera (293 members)	872.00	0.00	0.00	872.00	100
Total	5,813.00	27.78	241.22	6,082.00	

#### Note:

Planted area of KUD was decreased due to the smallholder out from the certification scope.

#### Details

KUD Bhakti Mandiri : 31 members resigned due to independent replanting and cases of underplanting (not in accordance to company procedure), total area of 62 Ha

KUD Jaya Makmur: 28 members resigned due to independent replanting and cases of underplanting (not in accordance to company procedure), total area of 56 Ha

KUD Sumber Rejeki: 6 members resigned due to independent replanting and cases of underplanting (not in accordance to company procedure), total area of 12 Ha

KUD Sejahtera: 2 members resigned due to independent replanting and cases of underplanting (not in accordance to company procedure), total area of 4 Ha

6. Plantings & Cycle						
Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Buatan Estate	145	1,806	0	402	2,208	145
KUD Bhakti Mandiri	0	386	0	532	918	0
KUD Jaya Makmur	172	178	0	514	692	172
KUD Sumber Rejeki	300	0	0	506	506	300
KUD Sejahtera	0	0	0	872	872	0
Total (ha)	617	2,370	0	2,826	5,196	617
Note: Only Mature area is considere	d as production	area	•			

7. Summary of Certified Tonnage of FFB (Own Certified Scope)							
Estate /	Tonnage (MT) / 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 23 -June 24)	2025)			
Buatan Estate	42,000.00	0	0	0.00			
KUD Bhakti Mandiri	17,151.00	1,470.39	11,600.21	19,766.00			
KUD Jaya Makmur	14,306.00	1,397.98	8,954.06	14,459.00			
KUD Sumber Rejeki	11,402.00	1,095.14	6,358.09	10,588.00			
KUD Sejahtera	17,932.00	1,378.07	9,994.64	18,136.00			



Total 102,791.00	42,248.58	62,949.00
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Note:

Certified FFB from Buatan I Estate send to Buatan II POM (RSPO Certified)

KUD Bhakti Mandiri : 918 Ha; 19,766 Mt; OER = 21.53, almost half of the area are (approx 40%) at the time of productive plant age (4-14)

KUD Jaya Makmur : 864 Ha; 14,459 Mt; OER = 16.73, production area decreased due to members resigned

KUD Sumber Rejeki : 806 Ha; 10,588 Mt; OER = 13.13, 300 ha (37.22%) of area are immature area KUD Sejahtera : 872 Ha; 18,136 Mt; OER = 20.79, actual production due to good BMP (manuring)

8. Summary of Certified Tonnage of FFB (from other certified unit(s))							
Estate / Tonnage (MT) / year							
Smallholders	Estimated last year (Aug 2023 – July	Act (July 2023 -	Forecast (Aug 2024 – Jul				
	2024)		Current license period (Aug 23 -June 24)	2025)			
-		-	-				
Total			-				
Note:							

9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)					
Out growers / smallholders		Tonnage (	(MT) / year		
	Estimated last year Actual (July 2023 – June 2024)				
	2024)	Previous license period (July 2023)	Current license period (Aug 23 -June 24)	2025)	
CSV	11,687.40	143.72	2,543.92	-	
3 <sup>rd</sup> Party (CV PNR SAM, CV Pardamaran JH and PT Kinabalu Perkasa)	203,312.60	12,630.59	122,072.40	-	
Total	215,000.00	137,3	-		
Note:					

9A. I	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	July – 2023 5,341.58		18,115.89			
2	August	5,069.00	12,424.63	17,493.63			
3	September	4,281.00	10,152.69	14,433.69			



Note:						
	TOTAL	42,248.58	137,390.63	179,639.21		
12	June	3,236.00	14,791.00	18,027.00		
11	May	3,402.00	14,558.00	17,960.00		
10	April	2,939.00	14,011.00	16,950.00		
9	March	2,559.00	9,905.00	12,464.00		
8	February	2,273.00	6,503.00	8,776.00		
7	January – 2024	2,755.00	7,217.00	9,972.00		
6	December	2,970.00	7,748.00	10,718.00		
5	November	3,515.00	13,250.00	16,765.00		
4	October	3,908.00	14,056.00	17,964.00		

10. Summary of Certified Tonnage (MT) (not applicable for ISS)						
Estimated last year (Aug 2023 – July 2024)	Actual (July 2023 – June 2024)			Forecast (Aug 2024 – Jul 2025)		
	Previous license period (July 2023)		Current license period (Aug 23 -June 24 )			
FFB		F	FB	FFB		
102,791.00 mt	5,341.58 mt 36,907.00 mt <b>TOTAL</b> 42,248.58 mt		62,949.00 mt			
			42,248.58 mt			
CPO (OER: 18.80 %)		CPO (OER	R: 18.97 %)	CPO (OER: 16.89 %)		
19,322.00 mt	1,013.30	mt	7,001.26 mt	10,632.08 mt		
	TOTAL		8,014.56 mt			
PK (KER: 5.15 %)		PK (KER: 5.68 %)		PK (KER: 5.12 %)		
5,294.00 mt	303.40 mt 2,096.32 mt		2,096.32 mt	3,222.98 mt		
	TOTAL	2,399.72 mt		1		

#### Note:

Certified FFB from Buatan I Estate send to Buatan II POM (RSPO Certified)

KUD Bhakti Mandiri : 918 Ha; 19,766 Mt; OER = 21.53, almost half of the area are (approx 40%) at the time of productive plant age (4-14)

KUD Jaya Makmur: 864 Ha; 14,459 Mt; OER = 16.73, production area decreased due to members resigned KUD Sumber Rejeki: 806 Ha; 10,588 Mt; OER = 13.13, 300 ha (37.22%) of area are immature area KUD Sejahtera: 872 Ha; 18,136 Mt; OER = 20.79, actual production due to good BMP (manuring)



10A.	10A. Monthly Records of Certified CPO & PK since the last audit						
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)				
1	July – 2023	1,013.30	303.40				
2	August	961.59	287.92				
3	September	812.11	243.16				
4	October	741.35	221.97				
5	November	666.80	199.65				
6	December	563.41	168.70				
7	January – 2024	522.62	156.48				
8	February	431.19	129.11				
9	March	485.44	145.35				
10	April	557.53	166.94				
11	May	645.36	193.23				
12	June	613.87	183.80				
	TOTAL 8,014.56 2,399.72						
Note	:	Note:					

11. Summary of Actual Volume sold  Current License period (Aug 23 -June 24)							
	RSPO Certified	ISCC	Others	Conventional	Total		
CPO (MT)	0	6,817.50	0	0	6,817.50		
PK (MT)	2,100.05	0	0	0	2,100.05		
Credits	0	0	0	0			
Previous Lice	ense period (July 2023)						
CPO (MT)	0	819.76	0	0	819.76		
PK (MT)	290.28	0	0	0	290.28		
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 – KCP Buatan RSPO_PO1000002758		-	2,390.33
TOTAL				2,390.33
Note:				

11B. Re	11B. Records of certified CPO & PK Sold under other schemes since the last audit (if any)					
No.	Buyers Name	Scheme Name	Certified CPO Sold (MT)	Certified PK Sold (MT)		
	PT. Sari Dumai Sejati	ISCC	7,637.26	0		
		TOTAL	7,637.26	0		
Note:						

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

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

12. Inde	12. Independent Smallholders Certified Tonnage (MT) / Volume								
		mated las 2023 — Jul				Forecast (Aug 2024 – Jul 2025)			
Dhasa	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			-			-			-
IS-CSPO	-	-		-	-		-	-	
IS-CSPKO	-	-		-	-		-	-	
IS-CSPKE	-	-		-	-		-	-	
CSPK	-	-		-	-		-	-	



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

13. Inde	13. Independent Smallholders Actual Sold Tonnage / Volume											
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	СЅРК	IS-CSPKO	IS-CSPKE					
Current Li	Current License period (Aug 23 -June 24)											
Credits				-	-	-	-					
Physical	-	-	-									
Previous I	Previous License period (July 2023)											
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)				
	-	-	-	-	-	-	-				
		TOTAL	-	-	-	-	-				
Note	:			•							



#### **Section 2: Assessment Process**

#### **Certification Body:**

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

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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 **22 – 26 July 2024**. The audit programme is included as Section 2.3.

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

The Critical NC close out was conducted on **13 September 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 certification unit 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 (Recertification 2)	Year 2 (ASA2_1)	Year 3 (ASA2_2)	Year 4 (ASA2_3)	Year 5 (ASA2_4)					
Buatan I Palm Oil Mill	X	Х	Х	Х	Х					
Buatan Estate	X	Х	Х	X	X					
KUD Bhakti Mandiri	X	Х	Х	Х	X					
KUD Jaya Makmur	X	Х	Х	Х	X					
KUD Sumber Rejeki	Х	Х	Х	Х	X					
KUD Sejahtera	X	X	X	X	X					

Tentative Date of Next Visit: July 14, 2025 - July 19, 2025

**Total Number of Mandays: 21 man days** 

#### 2.2 BSI Assessment Team

Name	Role	Competency
Eko Prastio Ramadhan	Team Leader	<b>Education:</b> Holds a Bachelor Degree in Forest Resources Conservation and Ecotourism from Forestry Faculty, Bogor Agricultural University (IPB).
		<b>Work Experience:</b> Over 4 years of working experience in biodiversity officer with Birdlife Indonesia and consultant with PT Inoa Konsultindo. 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 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.
		<b>Training attended:</b> Completed ISO 14001:2015 Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, Social Impact Assessment Training, Endorsed RSPO SCC Auditor 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:
		$\square$ Good Agriculture Practice $\square$ Health and Safety $\square$ Supply chain requirements
		☐ Social ☑ Environmental ☐ Market Communication and claim requirements
		$\hfill\Box$ ISH context (ICS, internal audit, policy, business planning and trading system)



Mujinius Jalaraya	Team Member	<b>Education:</b> Holds a Bachelor Degree majoring in Forest Resources Conservation and Ecotourism, Bogor Agricultural University (IPB).
		<b>Work Experience:</b> 6 years working experience in palm oil plantations as SHE Assistant at PT. Astra Agro Lestari Tbk and Sustainability Supervisor at Teladan Prima Group. 9 years working experience as RSPO Auditor/Lead Auditor.
		Training attended:
		Completed ISO 9001 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
		☐ Social ☐ Environmental ☒ Market Communication and claim requirements
		$\hfill \square$ ISH context (ICS, internal audit, policy, business planning and trading system)
Nanang Rusmana	Team Member	<b>Education:</b> Holds a Bachelor Degree of Forestry, Bogor Agricultural University (IPB)
		<b>Work Experience:</b> 5 years working experience in palm oil industry as SHE Assistant at PT. Astra Agro Lestari Tbk. 3 years working experience in mining industry as Environment Coordinator and SHE Coordinator with PT. Kapuas Prima Coal Group. 6 years working experience as RSPO/ISPO Lead auditor.
		<b>Training attended:</b> Completed ISO 9001:2015 Lead Auditor Course, ISPO Auditor Course, ISO 14001:2015 Lead Auditor Course, ISO 45001:2018 Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, Endorsed RSPO Supply Chain Certification Lead Auditor Course, SMK3 Auditor Course, HCV Assessor Course, General OHS Expert Course, SMETA Requirements training.
		Language proficiency: Fluent in Bahasa Indonesia and English
		Aspect covered in this audit:
		oxtimes Good Agriculture Practice $oxtimes$ Health and Safety $oxtimes$ Supply chain requirements
		☐ Social ☐ Environmental ☐ Market Communication and claim requirements
		☐ ISH context (ICS, internal audit, policy, business planning and trading system)
Edy Widodo	Team Member	<b>Education:</b> Holds a Bachelor Degree majoring Agricultural Technology from University of Padjadjaran, Bandung.
		<b>Work Experience:</b> 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
		oximes Social $oximes$ Environmental $oximes$ Market Communication and claim requirements
		$\hfill \square$ 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)
		Working 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.
		Trainings 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 (2022).
		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
		$\square$ Social $\square$ Environmental $\square$ Market Communication and claim requirements
		$\hfill \square$ ISH context (ICS, internal audit, policy, business planning and trading system)

#### **Accompanying Persons:**

Name	Role
-	-

#### 2.3 Assessment Plan

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

Date	Time	Subjects	ER	МЈ	NR	SS	EWi
Monday, 22/07/2024	07.30 – 09.15	Flight Jakarta — Pekanbaru (GA 172)	<b>√</b>	<b>√</b>	<b>√</b>	<b>√</b>	√
	10.00 – 12.00	Travel to Site	√	<b>√</b>	<b>√</b>	√	<b>√</b>



Date	Time	Subjects	ER	МЈ	NR	SS	EWi
	12.00 – 14.00	Break	√	√	√	√	√
	14.00 - 15.00	Opening Meeting	√	√	√	√	√
		<ul> <li>Presentation by PT. IIS – Buatan I POM, Estate and Smallholder</li> <li>Presentation by BSI Indonesia</li> </ul>					
	15.00 – 17.00	Field Visit to Buatan I POM	√	√	√	√	
	15100 17100	Occupational Health and Safety, Environment Aspect.	·	·	,	·	
		Social Aspect and workers welfare, workers interview					
		Best Management Practice for Mill and supply chain for mill.					
		Market Communication and claim requirements Inspection of processing, warehouse, workshop, mill wastes management, Effluent Ponds, OHS, Environment issues, POME application, workers interview, Supply chain for CPO mill, Review on SEIA documents and records, Document review, etc.					
	15.00 – 17.00	Public Consultation (Internal)					√
		Union Labour					
		Koperasi Karyawan					
		Gender committee					
Tuesday,	08.00 - 12.00	Field Visit to Buatan I Estate	√	√	√	√	
23/07/2024		<ul> <li>Herbicide application programmes, harvesting, fertilizing operations, water management, road maintenance, terracing, HCV's, riparian zones, etc.</li> </ul>					
		Agrochemical stores, Fertilizer store, workshops, housing, landfill, clinic, riparian zones, Hazardous Waste, waste management, etc.					
		Boundaries inspection, worker interviews, social amenities, etc.					
		Field implementation for Operation Procedure.					



Date	Time	Subjects	ER	МЈ	NR	SS	EWi
	08.00 - 12.00	Stakeholder consultation					√
		Local communities					
		Contractor					
		Governance body					
	12.00 – 14.00	BREAK	√	√	√	√	√
	14.00 – 16.30	Document Review for Estate and POM	√	√	√	<b>√</b>	√
	16.30 – 17.00	Review	√	√	√	√	√
Wednesday	08.00 - 12.00	Field Visit to Scheme Smallholder		√	√	√	
24/07/2024		KUD Bhakti Mandiri					
		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	Field Visit to Scheme Smallholder	√				√
		KUD Jaya Makmur					
		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.					
	12.00 – 14.00	BREAK	√	√	√	<b>√</b>	√
	14.00 – 16.30	Field Visit to Scheme Smallholder		√	√	√	
		KUD Sumber Rejeki					
		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.					
	14.00 – 16.30	Field Visit to Scheme Smallholder	√				√
		KUD Sejahtera					
		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.					
	16.30 – 17.00	Review	√	√	√	√	√



Date	Time	Subjects	ER	МЈ	NR	SS	EWi
Thursday 25/07/2024	08.00 - 12.00	Document Review for Estate, POM and Scheme Smallholder	√	√	√	√	√
	12.00 – 14.00	BREAK	√	√	√	√	√
	14.00 – 16.30	Document Review for Estate, POM and Scheme Smallholder	√	√	√	√	√
	16.30 – 17.00	Review	√	√	√	√	√
Friday 26/07/2024	08.00 - 12.00	Document Review for Estate, POM and Scheme Smallholder	√	√	√	√	√
	12.00 – 14.00	BREAK	√	√	√	√	√
	14.00 – 15.30	Document Review for Estate, POM and Scheme Smallholder	√	√	√	√	√
	15.30 – 16.00	Auditors Meeting/ Preparation for Closing Meeting	√	√	√	√	√
	16.00 – 17.00	Closing Meeting	<b>√</b>	√	√	√	√

#### **NCR Close-out Visit Assessment Plan**

Date	Time	Subjects	МЈ
Friday 13/09/2024	07.30 - 09.15	Flight Jakarta — Pekanbaru (GA 172)	
	10.00 - 12.00	Travel to Site	√
	12.00 - 13.00	Break	
	13.00 – 13.30	<ul> <li>Opening Meeting</li> <li>Presentation by PT. IIS – Buatan I POM, Estate and Smallholder</li> <li>Presentation by BSI Indonesia</li> </ul>	√



Date	Time	Subjects	МЈ
	13.30 – 16.30	NCRs verification and evaluation - Document review - Interview	√
	16.30 – 17.00	Closing meeting	<b>√</b>

#### **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?	There are remaining mill and estate that has not certified yet:	Complied
If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021	<ul> <li>Bahilang Estate (1,019 ha) as Supply base for Tanah Datar Mill, planned in year 2024 due to still in process of RACP Concept Note still on Progress and submit to RaCP team at Q2 2023. Target to conduct audit at Q1 2024;</li> <li>Topaz Estate (230 ha) as supply bases of Topaz Mill planed in 2026 due to HGU still in the process, to propose to Local Government and BPN Pusat;</li> <li>Teluk Panjie Estate (801 ha) as supply bases for Teluk Panjie Mill planned in 2026 due to HGU still in process. HGU still on Progress, since the estate under 2 different province, the final approval must come from National Authority (BPN Pusat);</li> </ul>	
	- Sentral Estate (2,996 ha) as Supply bases for Gunung Melayu II POM planned in 2024 due to still in process of RACP (recertification 2020). Concept Note still on Progress and submit to RaCP team at Q2 2023. Target to conduct audit at Q1 2024.  Revision of Time bound plan has been approved	
	by RSPO on 19 April 2023. The submission is	



	according to the template as announced by the RSPO Secretariat on 21/12/2021.	
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 Secretariat on 21/12/2021.	No, there is no new acquisition conducted by PT Inti Indosawit Subur and its subsidiary.	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	Yes, there is time bound plan revision dated 19 April 2023. Justification available and approved by RSPO on 19 April 2023.	Complied
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. Justification available and approved by RSPO on 19 April 2023. Justification as below:  - Bahilang Estate (1,019 ha) as Supply base for Tanah Datar Mill, planned in year 2024 due to still in process of RACP Concept Note still on Progress and submit to RaCP team at Q2 2023. Target to conduct audit at Q1 2024;  - Topaz Estate (230 ha) as supply bases of Topaz Mill planed in 2026 due to HGU still in the process, to propose to Local Government and BPN Pusat;  - Teluk Panjie Estate (801 ha) as supply bases for Teluk Panjie Mill planned in 2026 due to HGU still in process. HGU still on Progress, since the estate under 2 different province, the final approval must come from National Authority (BPN Pusat);  - Sentral Estate (2,996 ha) as Supply bases for Gunung Melayu II POM planned in 2024 due to still in process of RACP (recertification 2020). Concept Note still on Progress and submit to RaCP team at Q2 2023. Target to conduct audit at Q1 2024. This has been consistent with ACOP reporting.	Complied
Have there been any isolated lapses in implementation of the plan? If yes a <b>Minor</b> noncompliance shall be raised	No isolated lapses in implementation of the plan.	Complied
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a <b>Major</b> non-compliance shall be raised	No any fundamental failure to justify delay in planning the assessments.	Complied
Un-Certified Units or Holdings		



No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12.	According to internal audit result in 2023 and HCV assessment for uncertified unit it was confirmed that there is no primary forest or HCV areas replace for plantation. All uncertified unit was existing plantation since 1990 and some of the plantation has been replanting.  Internal audit has been conducted for Bahilang Estate on 14 – 19 August 2023, Teluk Panji Estate on 22 – 27 May 2023, Topaz Estate on 10 – 16 May 2023 and Sentral Estate on 8 – 16 August 2023.	Complied
Any new plantings since January 1 <sup>st</sup> 2010 shall comply with the RSPO New Plantings Procedure.	No new planting after January 2010. RaCP for Bahilang and Sentral Estate still on going process, Concept Note still on Progress and submit to RaCP team at Q2 2023.	Complied
Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.	According to internal audit result on 2023, there is no land conflict occur in area of uncertified units: Topaz Estate, Bahilang Estate, Teluk Panjie Estate and Sentral Estate.	Complied
	According to the RSPO RaCP tracker (https://www.rspo.org/certification/remediation-and-compensation/racp-tracker) update 03 August 2023, PT Inti Indosawit Subur has:	
	<ul><li>MU's with potential liabilities: 4 units</li><li>LUCA Submitted (MUs): 4 units</li></ul>	
	LUCA review completed (MUs): 4 units	
	Concept Note required (MUs): 3 units	
	Concept Note submitted (MUs): 2 units	
	Concept Note approved (MUs): 2 units	
	Concept Note submitted (MUs): 0	
	Concept Note endorsed (MUs): 0	
	Remediation Plan required (MUs): 4 units	
	Remediation Plan submitted (MUs): 0	
	Remediation Plan approved (MUs): 0	
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	Internal audit has conducted for Bahilang Estate on 14 – 19 August 2023, Teluk Panji Estate on 22 – 27 May 2023, Topaz Estate on 10 – 16 May 2023 and Sentral Estate on 8 – 16 August 2023; According to internal audit result confirmed that there is no Labor disputes occur in this management unit.	Complied
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	Internal audit has conducted for Bahilang Estate on 14 – 19 August 2023, Teluk Panji Estate on 22 – 27 May 2023, Topaz Estate on 10 – 16 May 2023 and Sentral Estate on 8 – 16 August 2023;	Complied



	According to internal audit result confirmed that there is no legal non compliance occurred in this management unit.	
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 has conducted for Bahilang Estate on 14 – 19 August 2023, Teluk Panji Estate on 22 – 27 May 2023, Topaz Estate on 10 – 16 May 2023 and Sentral Estate on 8 – 16 August 2023. Report of internal audit are available. Result of internal audit:	Complied
	- Bahilang Estate, Teluk Panji Estate and Sentral Estate has complies 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 peoples land and no HCV area replacement.	
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.	Complied
Have there been any stakeholder (including NGO) consultation conducted?	Stakeholders consultation already conducted during internal audit for Bahilang Estate on 14 – 19 August 2022, Teluk Panji Estate on 22 – 27 May 2023, Topaz Estate on 10 – 16 May 2023 and Sentral Estate on 8 – 16 August 2023;. There is no issue from stakeholder consultation.	Complied

#### 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?	Yes, PT Inti Indosawit Subur Group has including 100% the scheme smallholder in their certification.	Complied				
OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years.						

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

#### **Approved Time Bound Plan**

Name of Mill	Mill Address	Name of Supply Bases	Location / Address	Time Bound for Certification	Status			
Buatan I Mill – PT Inti Indosawit Subur	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau	Buatan Estate	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau	2010	Certified on 16 September 2010 Re-Certified on 16 September 2015 Re-certified in 2020-2021			
		Buatan (Plasma)	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau					110 001 011100 111 2020 2021
Buatan II Mill - PT Inti Indosawit Subur	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau	Simpang Perak Estate*	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau	2010	Re-Certified on 16 S 2015	Certified on 16 September 2010 Re-Certified on 16 September 2015 *Split From Buatan Estate		
		Buatan (Plasma)	Delik & Pangkalan Kerinci Village, Bunut Langgam District, Pelalawan Regency, Riau		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 Re-certified in 2021			

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

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
		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

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Name of Mill	Mill Address	Name of Supply Bases	Location / Address	Time Bound for Certification	Status
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
Taman Raja Mill – PT Dasa Anugrah Sejati	Lubuk Bernai / Kampung Baru / Pelabuhan Dagang / Pematang Pauh Vilage, Tungkal Ulu District, Tanjung Jabung Regency, Jambi	Taman Raja, Badang & Bernai Estate*	Lubuk Bernai / Kampung Baru / Pelabuhan Dagang / Pematang Pauh Vilage, Tungkal Ulu District, Tanjung Jabung Regency, Jambi	2015	Certified on 20 February 2015 *Bernai Estate Split From Taman Raja & Badang Estate Since 1 January 2019 Re-certified in 2020
Segati Mill – PT Mitra Unggul Pusaka	Langkan / Penarikan / Tambak / Sotol Village, Langgam District, Pelalawan Regency, Riau	Segati Estate	Langkan / Penarikan / Tambak / Sotol Village, Langgam District, Pelalawan Regency, Riau	2022	Certified on 1 November 2022
		Gondai Estate	Pangkalan Sarik / Baru Village, Langgam / Siak Hulu District, Pelalawan / Kampar Regency, Riau	2022	Certified on 1 November 2022
Penarikan Mill  — PT Mitra Unggul Pusaka	Penarikan Village, Langgam District, Pelalawan Regency, Riau	Penarikan Estate*	Penarikan / Tambak Village, Langgam District, Pelalawan Regency, Riau	2022	Certified on 1 November 2022
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



Name of Mill	Mill Address	Name of Supply Bases	Location / Address	Time Bound for Certification	Status
		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	2015	Certified on 21 April 2015 Re-certified in 2020
Matia Abaui	Labuhan Batu Regency, North Sumatra	" /TIID " EII (00411)   " "	2026	HGU is still in Process	
Peranap Mill – PT Rigunas	Sengkilo Village, Peranap District, Indragiri Hulu	Peranap Estate	Simelinyang / Pauh Ranap / Sengkilo Village, Peranap	2015	Certified on 7 January 2015 Re-certified in 2020
Agri Utama		, ,	Peranap (Plasma)	District, Indragiri Hulu Regency, Riau	2016
Bungo Tebo Mill – PT	Village, PWK Sumai / Tebo Ulu District, Bungo Tebo	Bungo Tebo Estate	Tuo Sumai / Sungai Rambai Village, PWK Sumai / Tebo Ulu District, Bungo Tebo Regency, Jambi	2015	Certified on 3 December 2015 Re-certified in 2020
Rigunas Agri Utama		Bungo Tebo (Plasma)		2017	Certified on 7 February 2017 Re-certified in 2022
Tanjung Selamat Mill –	Kampung Padang Village, Bilah Hilir District, Labuhan	Tanjung Selamat	Kampung Padang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	2015	Certified on 26 May 2015 Re-certified in 2020

Name of Mill	Mill Address	Name of Supply Bases	Location / Address	Time Bound for Certification	Status
PT Indo Sepadan Jaya	Batu Regency, North Sumatra	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	*	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
Melayu	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	<ul> <li>Certified on 23 December 2016 as Independent Mill</li> <li>Audit in 2016 as Mill and Supply Base</li> <li>Re-certified in 2021</li> </ul>
		Aek Kuo (2,088 Ha)	Aek Korsik Village, Aek Natas	2018	Certified in 2018
		Aek Kuo (501 Ha)	District, Labuhan Batu Regency, North Sumatra	2018	
Negri Lama I Mill – PT Hari Sawit Jaya	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	*3rd party which is excluded from scope of certification	Negri Lama Seberang Village, Bilah Hilir District, Labuhan Batu Regency, North Sumatra	2015	<ul> <li>Certified on 8 April 2015</li> <li>Audit in 2016 as Independent Mill</li> <li>Re-certified in 2020</li> </ul>



#### 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 1 Critical; 4 Minor nonconformities and No Opportunity For Improvement raised. The key in certification unit name 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 #	2524777-202407-M1		26/07/2024	
Due Date	25/10/2024	Closure Date	13/09/2024	
Indicator & Category (Critical / Minor)	Indicator 2.3.2 (Escalated f	rom Minor)		
Statement of Nonconformity:		licator 2.3.1 (proof of land ow annot be shown during audit.		
Requirement Reference:	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.			
Objective Evidence:	Based on the document review, it is known that there are 2 (two) direct FFB suppliers for Buatan I POM, namely: CV PNR SAM, CV Pardamaran JH and PT Kinabalu Perkasa.			
	The company already has data of Information regarding the geolocation of FFB origins, and valid planting/operational/trading license, however for proof of land ownership and geolocations from the indirect supplier has not been able to show during audit.			
	For example:			
	• CV PNR SAM on behalf: Maryadi 19,259m²; Musriadi 19,920m²; Sri Windari 20,000m²; Musriadi 17,340m² and Sri Windari 19,874m².			
	• CV Pardamaran JH on behalf: Wagirah 2,989m2; Viqi Nurfajriyah 2,782m2; Dian Anggraeni 2,976m²; Sunardi 2,585m²; Nias Kuswandari 2,946m² and Wagirah 2,864m².			
	• PT Kinabalu Perkasa on behalf: Juminten 17,524m²; Miston 19,544m²; Danis 19,555m² and Sri Mundari 18,545m².			
Corrections:	<ul> <li>Conducting Traceability Socialization to farmers as third party FFB supplier</li> <li>Approaching farmers to be able to show legal documents of land ownership in fulfilling audits</li> </ul>			
Root Cause Analysis:	Third party FFB supplier farmers are unwilling to show proof of land ownership due to negative assumptions from farmers that legal documents will be misused.			
Corrective Actions:	Monitoring Traceability Socialization to farmers supplying Foreign Fruit at least once a year			



	Addition of clause related to willingness to show legal documents of farmers to	
	the company in the agreement contract with third party FFB supplier.	
Assessment Conclusion:	<ol> <li>PT IIS - Buatan I POM and Estate has conduct the socialization of traceability to farmers as third party FFB supplier, socialization conducted on 27 August 2024 to supplier PNR SAM, on 28 August 2024 to supplier Pardamaran JH and on 29 August 2024 to suplier FFB PT Kinabalu.</li> <li>PT IIS - Buatan I POM has provide the proof of land ownership and geolocation</li> </ol>	
	of FFB supplier, sample seen:	
	- CV PNR SAM: on behalf Maryadi (certificate of land title SHM No. 443, issued dated 28/07/2017, area 19,259 m²), Musriadi (certificate of land title SHM No. 68, issued dated 23/12/2005, area 17,340 m²), Sri Windari (certificate of land title SHM No. 30, issued dated 23/12/2005, area 19,874 m²), Musriadi (certificate of land title SHM No. 14032, issued dated 26/03/2021, area 19,920 m²), Sri Windari (certificate of land title SHM No. 442, issued dated 23/12/2009, area 20,000 m²). Land parcel maps and coordinate location are available and shown during audit. Another sample of land certificate also verified during audit.	
	<ul> <li>CV Pardamaran JH: on behalf Wagirah (certificate of land title SHM No. 14672, issued dated 26/12/2017, area 2,989 m²), Viqi Nurfajriah (certificate of land title SHM No. 14355, issued dated 27/12/2017, area 2,782 m²), Dian Anggraeni (certificate of land title SHM No. 14223, issued dated 26/12/2017, area 2,976 m²), Sunardi (certificate of land title SHM No. 14221, issued dated 27/12/2017, area 2,585 m2), Nia Kuswandari (certificate of land title SHM No. 14025, issued dated 27/12/2017, area 2,946 m²), Wagirah (certificate of land title SHM No. 12292, issued dated 26/12/2017, area 2,864 m²). Land parcel maps and coordinate location are available and shown during audit. Another sample of land certificate also verified during audit.</li> <li>PT Kinabalu: FFB supply from Juminten, Miston, Danis and Sri Mundari is no longer supply FFB to PT Kinabalu. During verification it was noted that PT Kinabalu is direct supplier which has own land on behalf of farmers under management of PT Kinabalu. Proof of land ownership in the form of land certificate (SKT) and Land Compensation Certificate (SKGR) as well as geolocation was provide during audit, sample seen:</li> </ul>	
	✓ SKT No. 505/SKT/SKJ/1992 dated 6/07/1992, area of 26,250 m² on behalf Nurdan, SKGR dated 13/07/1992 to Ms. Suliana (PT Kinabalu)	
	✓ SKT No. 366/SKT/SKJ/1992 dated 04/07/1992, area of 16,600 m² on behalf Sukur, SKGR dated 17/07/1992 to Ms. Suliana (PT Kinabalu)	
	✓ SKT No. 384/SKT/SKJ/1992 dated 04/07/1992, area of 20.105 m² on behalf Kamarudin, SKGR dated 07/07/1992 to Ms. Suliana (PT Kinabalu)	
	✓ SKT No. 509/SKT/SKJ/1992 dated 06/07/1992, area of 24.512 m² on behalf A. Kadir, SKGR dated 13/07/1992 to Ms. Suliana (PT Kinabalu)	
	✓ SKT No. 306/SKT/SKJ/1992 dated 07/07/1992, area of 20,000 m² on behalf Zainab, SKGR dated 13/07/1992 to Ms. Suliana (PT Kinabalu) Land parcel maps and coordinate location are available and shown during audit. Another sample of land certificate also verified during	



audit. List of farmer members including land maps and coordinate was sighted during audit.
3. PT IIS Buatan I POM has include the additional clause of statement of willingness to show legal documents of farmers to the company in the agreement contract with third party FFB supplier. Contract addendum of FFB supplier can be shown during audit and has include the clause of statement of willingness to show legal documents of farmers to the company. FFB contract with supplier as below:
- "Kontrak Jual beli TBS Nomor 109/TBS/IIS/2022 dated 30 June 2022, adendum dated 30 August 2024 - contract with CV Pardamaran JH.
- "Kontrak Jual beli TBS Nomor 003/TBS/IIS/2023 dated 30 June 2023, adendum dated 30 August 2024 - contract with PT Kinabalu Perkasa.
<ul> <li>"Kontrak Jual beli TBS Nomor 117/TBS/IIS/2021 dated 19 Oct 2021, adendum dated 30 August 2024 - contract with CV Putra Naiko raja Sonang (CV PNR SAM).</li> </ul>
Based on above verification, the non-conformance can be closed.

Non-conformity			
NCR Ref #	2524777-202407-N1		26/07/2024
Due Date	Next surveillance audit	Closure Date	Open
Indicator & Category (Critical / Minor)	Indicator 2.1.2 Minor		
Statement of Nonconformity:	Documented systems to ensure compliance with legal requirements are not effectively 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:	<ul> <li>Based on the verification results of the document "LEGAL COMPLIANCE EVALUATION OF PT INTI INDOSAWIT SUBUR - BUATAN GROUP Period May 2024" it is known that there is information that is no longer relevant in the evaluation of fulfillment related to wages where it is still written using the Decree of the Governor of Riau concerning the Minimum Wage of Regency/City in Riau Province in 2019 Number: Kpts. 1198/XI/2019 concerning the Minimum Wage of Regency/City in Riau Province, which is obsolete which should use the Decree of the Governor of Riau Number: Kpts.7618/XI/2023 concerning the Minimum Wage of Regency/City in Riau Province in 2024.</li> <li>Several relevant regulations are not listed in the legal compliance evaluation list, including:         <ul> <li>Minister of Manpower Decree No. 88 of 2023 concerning Guidelines for the Prevention and Handling of Sexual Violence in the Workplace</li> </ul> </li> </ul>		



	<ul> <li>Minister of Manpower Decree No. 2 of 2023 concerning Implementing Regulations of PP Number 66 of 2014 concerning Environmental Health.</li> </ul>	
	<ul> <li>Regulation of the Minister of Environment and Forestry No. P.106/MENLHK/SETJEN/KUM.1/12/2018 of 2018 concerning the Second Amendment to the Regulation of the Minister of Environment and Forestry Number P.20/MENLHK/SETJEN/KUM.1/6/2018 concerning Protected Plant and Animal Species.</li> </ul>	
	<ul> <li>Regulation of the Minister of Manpower 38 of 2016 concerning Occupational Safety and Health of Aircraft Power and Production</li> </ul>	
	<ul> <li>Regulation of the Minister of Manpower 9 of 2016 concerning Occupational Safety and Health in Work at Heights.</li> </ul>	
	There is the use of 2 outsourcing workers as sorting workers as of July 3, 2024 from the Outsourcing Manpower Provider Service on behalf of PT Permata Indo Sejahtera, but the cooperation contract document that has been agreed upon and signed by both parties (PT IIS and PT Permata Indo Sejahtera) has not been shown.	
Corrections:	- Carry out updates on the evaluation of legal compliance in accordance with relevant government regulations	
	- Request a copy of the cooperation agreement document Buatan I POM with PT Permata Indo Sejahtera to the HRD Team unit.	
Root Cause Analysis:	- Lack of monitoring and evaluation of legal compliance by PT. Inti Indosawit Subur	
	- The MoU between PT. Inti Indonsawit Subur and PT. Permata Indo Sejahtera is not well documented.	
Corrective Actions:	Conduct monitoring related to changes in government regulations periodically at least once a year and then update them in the evaluation of legal compliance.	
	- Monitoring for every contractor requesting a letter of agreement document from HRD and storing it properly in hard copy and soft copy.	
Assessment Conclusion:	Will be verify in the next surveillance assessment.	

Non-conformity			
NCR Ref #	2524777-202407-N2	Issued Date	26/07/2024
Due Date	Next surveillance audit	Closure Date	Open
Indicator & Category (Critical / Minor)	Minor Indicator 2.2.1		
Statement of Nonconformity:	There are contractors who are not included in the list of contractors for the 2024 period		
Requirement Reference:	A list of contracted parties is available		
Objective Evidence:	There is a contractor that is not included in the list of contractors for the 2024 period, namely PT Permata Indo Sejahtera (Outsourcing Services). Furthermore,		



	the cooperation contract document that has been agreed upon and signed by both parties (PT IIS and PT Permata Indo Sejahtera) has not been shown.
Corrections:	Request a copy of the cooperation agreement document Buatan I POM with PT Permata Indo Sejahtera to the HRD Team unit.
Root Cause Analysis:	The MoU between PT. Inti Indonsawit Subur and PT. Permata Indo Sejahtera is not well documented.
Corrective Actions:	Monitoring for every contractor requesting a letter of agreement document from HRD and storing it properly in hard copy and soft copy.
<b>Assessment Conclusion:</b>	Will be verify in the next surveillance assessment.

Non-conformity				
NCR Ref #	2524777-202407-N3	Issued Date	26/07/2024	
Due Date	Next surveillance audit	Closure Date	Open	
Indicator & Category (Critical / Minor)	Minor Indicator 3.4.2			
Statement of Nonconformity:	Evidence of stakeholder in document.	nvolvement is not available	in the RKL RPL report	
Requirement Reference:	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			
Objective Evidence:	The company has RKL RPL documents for Semester 1 and Semester 2 of 2023. One of the aspects monitored is Socio-Economic Culture. The monitoring methods used include direct observation in the field, interviews with village officials, subdistricts, agencies in charge of activities and community leaders; direct data collection from the community in the village related to the questionnaire method; interviews with local and migrant workers.  However, after conducting a document review of the RKL RPL Report documents for Semester 1 and Semester 2 of 2023, it was found that evidence of stakeholder participation was not available in the RKL RPL Report document.  Further verification, the social impact monitoring document could not be shown during the audit.			
Corrections:	Update information related to social, economic and cultural monitoring to company stakeholders in the social impact monitoring document in the RKL RPL report.			
Root Cause Analysis:	Social, economic and cultural monitoring has been carried out for the company's stakeholders. However, this information has not been updated in the social impact monitoring document.			
Corrective Actions:	Conducting monitoring of social impact monitoring documents is monitored to be updated when monitoring is carried out related to social, economic and cultural matters for company stakeholders.			
Assessment Conclusion:	Will be verify in the next surveillance assessment.			



Non-conformity				
NCR Ref #	2524777-202407-N4	Issued Date	26/07/2024	
Due Date	Next surveillance audit	Closure Date	Open	
Indicator & Category (Critical / Minor)	Minor Indicator 7.3.3			
Statement of Nonconformity:	There is waste burning activity in the residential area of the Buatan I POM employees.			
Requirement Reference:	The unit of certification does not use open fire for waste disposal.			
Objective Evidence:	The company has a mechanism for managing organic and inorganic waste. Organic waste is disposed of in a trash hole for the composting/decomposition process. While inorganic waste is disposed of in the main trash bin. However, during the audit, waste burning activities were found in the residential environment of Buatan I POM employees.			
Corrections:	Re-socializing employees verbally and using the method of installing billboards prohibiting burning garbage in residential areas			
Root Cause Analysis:	Employee awareness is still lacking in domestic waste management			
Corrective Actions:	<ul> <li>Conduct regular monitoring of the implementation of the ban on burning garbage in housing estates at least once a year</li> <li>Routine socialization once a year and installation of a ban on burning billboards</li> </ul>			
Assessment Conclusion:	Will be verify in the next surveillance assessment.			

Opport	Opportunity for Improvements		
OFI#	Description		
OFI 1	-		

Positiv	Positive Findings		
PF#	Description		
PF 1	-		

#### 3.3.1 Status of Nonconformities Previously Identified and Opportunity for Improvement

Previous Audit Critical (Major) Non-conformity			
NCR Ref #	2366049-202307-M1	Issued Date	08/07/2023
Due Date	08/10/2023	Closure Date	26/09/2023



Indicator & Category (Critical / Minor)	3.6.1 Critical		
Statement of Nonconformity:	Risk analysis has been carried out by the company, however there is no updates or adjustments made to risk controls related to several accidents that have occurred in the field and contractor activity.		
Requirement Reference:	(C) All operational activities risks assessed to identify the H&S issues. Mitigation plans and procedures are documented and implemented.		
Objective Evidence:	• In March 2023 there was an accident that caused fertilizer employee Monida Halawa to fall from a truck and get a head injury, however there was no update related to HIRADC for fertilizer distribution activities with the risk of an accident falling from a truck and get a head injury. In the HIRADC update January 2, 2023, it states that fertilizer distribution only risks irritation and respiratory problems due to skin contact and inhalation of fertilizer dust with risk control only using PPE masks, goggles and aprons.		
	• There are still found personnel (truck driver) who do not comply with the rules according to HIRADC for using PPE (helmets and shoes) in the mill area.		
	Based on work accident reports for the period January - June 2023 there have been 28 cases of accidents (minor injury category), but there has been no evaluation and follow-up or action plans to mitigate similar work accidents.		
	Based on field visit and interview in Buatan I POM, it was discovered that there was boiler repair contractor activity at Buatan I POM by PT Persada Dinamika Jaya, however this activity was not covered in HIRADC, furthermore there was no evidence of Job safety analysis for this work.		
Corrections:	Coordinate with the HSE team in updating HIRADC by observing and re-analyzing the risks of fertilizer work		
	<ul> <li>Providing PPE at security posts for drivers who do not bring helmets to the Mill and socializing PPE SOPs to security and drivers</li> </ul>		
	Coordinate with the HSE Team in carrying out and evaluating follow-up actions to mitigate work accidents, whether in the category of minor or serious injuries		
	<ul> <li>Coordinate with the HSE team in updating HIRADC by analyzing the risk of work accidents in the activities of boiler repair/maintenance by contractors and develop job safety analyzes related to the activities of boiler repair/maintenance by contractors.</li> </ul>		
Root Cause Analysis:	Updates to the risk analysis documents only been carried out at the beginning of every year, so that when an accident occurs and new activity conducted by contractor the risk analysis documents for each job are not updated.		
	Follow-up evaluations of work accidents have only been carried out for the serious or fatal categories		
	Lack of monitoring by OHS personnel for HIRADC and its implementation.		
Corrective Actions:	Update HIRADC at least once a year, and if a work accident occurs, an evaluation and update is carried out in the HIRADC document		
	Specialization of PPE SOPs to security and drivers at least once a year		



	• In every work accident, an evaluation or follow-up must be carried out on the work accident update HIRADC on every contractor activity
Assessment Conclusion:	• Certificate holder by HSE Manager and OHS expert has update the HIRDC document for fertilizer activity in the field. Update HIRADC dated 7 August 2023 were evident. Risk of fertilizer distribution activity has been defined in HIRADC document: falling from a truck and get a head injury; mitigation plan has been determined by safe working practices, OHS briefing, supervision and PPE usage.
	<ul> <li>Buatan I Palm Oil Mill has provided the PPE (safety shoes and safety helmet) in Security pos before entering Mill area. Socialization of PPE usage for driver and security has been conducted by OHS expert and mill manager to ensure all driver entering the Buatan I Palm Oil Mill wearing PPE provided by company. Evidence of PPE provision are available in "Berita Acara Penyediaan Sepatu Safety dan Helm di Pos Security PMKS Buatan I". Socialization of PPE usage has been conducted by mill management and OHS expert on 11 August 2023. During field visit to Buatan I POM and interview with security and FFB truck driver, it was confirmed that the driver are aware the obligation of PPE usage during entering the Mill area and security are aware to monitor and ensure all truck driver using appropriate PPE during entering the Mill area.</li> </ul>
	<ul> <li>Certificate Holder has evaluate the accident report and evaluate the existing HIRADC and update the HIRADC by considering work accidents, whether in the category of minor or serious injuries. HIRADC update were evident update on 7 August 2023.</li> </ul>
	<ul> <li>Certificate holder has update the HIRADC document particularly for boiler repair/maintenance by contractors and develop job safety analyzes related to the activities of boiler repair/maintenance by contractors. HIRADC update were evident update on 7 August 2023.</li> </ul>
	According to above evidence, NC Closed satisfactory.
Effectiveness Closure (for previous audit closed Critical NC):	In this surveillance 2.3 audit, the CAP implemented effectively and no recurrence NC. Based on document review, Risk Assessment presented in document of HIRADC - last review in 9 January 2024 covering for all activities both in Buatan I 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.

Previous Audit Minor Non-conformity						
NCR Ref #	2366049-202307-N1	Issued Date	08/07/2023			
Due Date	Next Surveillance	Closure Date	Escalated to Critical NC in CAV 2.3 Audit			
Indicator & Category (Critical / Minor)	2.3.2					
Statement of Nonconformity:	The evidence or proof of land ownership, geolocation and business permit for indirectly sourced FFB cannot be shown during audit.					



Requirement Reference:	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.			
Objective Evidence:	Based on document review and results of interviews with the Division in charge of purchasing foreign FFB, it was known that there are 2 (two) indirect suppliers of FFB. CV PNR SAM and CV Pardamaran JH, however the geolocation data and proof of land ownership has not been fully verified, that is only location points for sample plots have been taken, for example CV PNR SAM has only 5 (five) geolocation points for FFB suppliers, CV Pardamaran JH has only 3 (three) geolocation points for sample plots and several land title (SHM). Furthermore, data on business permits were not available during the audit.			
Corrections:	Collect and complete all information on proof of land ownership, geographic location of each indirect FFB supplier farmer/producer.			
Root Cause Analysis:	Information on land location only shows that the FFB comes from a non-forest area and information on coordinate points is based on agent coordinate points from suppliers.			
Corrective Actions:	monitoring and updating the completeness of information documents, proof of land ownership and geographical location of each indirect farmer supplier on a regular basis and every time there is an additional contract for an indirect FFB supplier.			
Assessment Conclusion:	Based on the document review, it is known that there are 2 (two) direct FFB suppliers for Buatan I POM, namely: CV PNR SAM, CV Pardamaran JH and PT Kinabalu Perkasa.			
	The company already has data of Information regarding the geolocation of FFB origins, and valid planting/operational/trading license, however for proof of land ownership and geolocations from the indirect supplier has not been able to show during audit.			
	Escalated to Critical NC in CAV 2.3 Audit			

Previous Audit Opportunity for Improvement				
OFI#	Description			
OFI 1	OFI Statement:			
	Indicator 3.4.3			
	Certificate holders may consider involving government representatives and non-governmental organizations in the review of social management and monitoring plans.			
	Verification / Follow-up actions:			
	Stated in indicator 3.4.3 "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".

#### 3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
798070-201906-N1	Minor	Indicator 2.2.2	04/07/2019	Closed 21/07/2020
798070-201906-N2	Minor	Indicator 4.8.2	04/07/2019	Closed 29/07/2020
1937165-202007-M1	Critical	Indicator 3.8.6	21/07/2020	Closed 20/10/2020
1937165-202007-M2	Critical	Indicator 3.8.16	21/07/2020	Closed 20/10/2020
1937165-202007-M3	Critical	Indicator 6.6.2	21/07/2020	Closed 20/10/2020
1937165-202007-M4	Critical	Indicator 7.10.1	21/07/2020	Closed 20/10/2020
2213452-202206-N1	Minor	Indicator 6.7.2	11/06/2022	Closed 07/07/2023
2366049-202307-M1	Critical	Indicator 3.6.1	08/07/2023	Closed 26/09/2023
2366049-202307-N1	Minor	Indicator 2.3.2	08/07/2023	Escalated to Critical NC
2524777-202407-M1	Critical	Indicator 2.3.2	26/07/2024	Closed 13/09/2024
2524777-202407-N1	Minor	Indicator 2.1.2	26/07/2024	Open
2524777-202407-N2	Minor	Indicator 2.2.1	26/07/2024	Open
2524777-202407-N3	Minor	Indicator 3.4.2	26/07/2024	Open
2524777-202407-N4	Minor	Indicator 7.3.3	26/07/2024	Open

#### 3.4 Stakeholders and previous land owner / user consultation

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss PT Inti Indosawit Subur – Buatan I 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 contact	ted	
Type of Stakeholder (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	<b>Type of Stakeholder</b> (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	Means of communication (e.g. face to face interview, email, phone interview, comment from public notice)
Internal	Gender committee Ibu Selvia JH (Ketua Komite Gender di PT IIS - Buatan Group)  Labour Union –PUK SPPP SPSI: Siswanto (Ketua PUK SPPP SPSI PBD)	Face to face interview
Government	<ul> <li>Dinas Lingkungan Hidup Kabupaten Pelalawan:         Bpk. Dely Abee (Kasi. Pengawas Lingkungan)     </li> <li>Dinas Lingkungan Hidup Prov. Riau:         Bpk. Heri (Kasi. Pengawas Lingkungan)     </li> <li>Dinas Perkebunan di Kabupaten Pelalawan:         Ibu Elizabeth     </li> <li>Dinas Perkebunan di Prov. Riau:         Bpk. Sondang Leni     </li> <li>Dinas Ketenagakerjaan Kabupaten Pelalawan/Provinsi Riau:         Bpk. Sondang Leni     </li> </ul>	Phone interview
Community	Penghulu/Kepala Desa Bukit Harapan (Kab. Siak) — Buatan I: Bpk. Ibu Lasmi Penghulu/Kepala Desa Lalang Kabung (Kab. Siak) — Buatan II: Bpk. Nanang	Face to face interview
Others / Online Media etc.	<ol> <li>https://suarafaktual.com/belum-kantongi-ijin-lingkungan-pembangunan-biogas-milik-pt-iis-sudah-mulai-beroperasi/ (Tanggal 18 Juni 2023) - Pembangunan Biogas di Buatan II</li> <li>https://www.busernews24.com/read-3472-2023-04-15-bau-busuk-menyeruak-diduga-berasal-dari-limbah-pt-iis-kebun-buatan.html (tanggal 15 April 2023) - Pencemaran anak sungai di Desa Lalang Kabung, Buatan II POM</li> <li>https://putusan3.mahkamahagung.go.id/pengadilan.html (Register: 04-01-2023 — Putus: 23-02-2023 — Upload: 07-03-2023) has been described, please see 2.3.1</li> </ol>	Comment from public notice



#### Komentar pemangku kepentingan

#### 1 Feedbacks:

#### Dinas Perkebunan di Kabupaten Pelalawan:

Ibu Elizabeth

#### Dinas Perkebunan di Prov. Riau:

Bpk. Sondang Leni

- The company has a Plantation Business Registration Certificate (SPUP). An assessment of the plantation class for the 2024 period has been carried out with the results of plantation class II.
- 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 and disease 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 Plantations, No.185/Mentanhut/VII/2000, dated November 3, 2000.

Regarding the issue of submitting replanting with BPDPKS funds, the submission will be made according to the location of the farmer's plantation. If the plantation location is in Siak Regency, then the BPDPKS replanting will be submitted to the Siak Regency Plantation Office and if the plantation location is in Pelalawan Regency, then the BPDPKS replanting will be submitted to the Pelalwan Regency Plantation Office.

Here is the Buatan Group Plasma Replanting Plan:

Realiz	ation	of Replanting							
Plasma	a Bua	ntan Group							
NO	SP	KUD	LUAS (Ha)		-	RENCAI	NA (Ha)	-	
140	35	KOD	AWAL	2025	2026	2027	2028	2029	2030
1	I	MULUS RAHAYU	698	-	322	-	•	-	-
2	II	BHIRAWA BHAKTI	992	224	-	248	•	282	-
3	III	BHAKTI MANDIRI	980	-	176	208	210	-	-
4	IV	JAYA MAKMUR	920	150	-	220	204	-	-
5	٧	SUMBER REZEKI	816	252	-	264	•	-	-
6	VI	SEJAHTERA	874	298	284	292	•	-	-
7	VII	TANI RUKUN	946	-	252	-	290	204	200
8	VIII	KEBUN SAWIT HARAPAN	800	278	-	276	•	-	246
9	IX	BUATAN JAYA	860	156	-	268	•	236	200
10	Χ	MITRA USAHA	1,200	200	-	250	304	-	254
11	XI	MAKARTI SAWIT	800	226	-	124	200	250	-
12	XII	BINA MULIA	872	-	240	-	242	194	196
<b>GRANI</b>	D TO	TAL	10,758	1,784	1,274	2,150	1,450	1,166	1,096

#### **Feedbacks:**

#### **Dinas Lingkungan Hidup Kabupaten Pelalawan:**

Bpk. Dely Abee (Kasi. Pengawas Lingkungan)

#### **Dinas Lingkungan Hidup Prov. Riau:**

Bpk. Heri (Kasi. Pengawas Lingkungan)



- The Company has revised the AMDAL document (Material I).
- The Company has environmental documents related to the development of a biogas plant and a kernel crushing plant (Material I).
- Replanting activities have been included in the environmental management and monitoring plan.
- The Company consistently reports environmental management: RKL-RPL Report, B3 Waste Management Report, Liquid Waste Utilization Report.
- PT Inti Indosawit Subur Buatan I & II POM has carried out good environmental management.
- The hazardous waste/LB3 monitoring report at the Hazardous Waste/LB3 Temporary Shelter (TPS) has been carried out.

#### There are 2 issues:

- 1. There is a problem from the community, namely an unpleasant odor, suspected to come from PT IIS Buatan Group waste. On April 13, 2023, the community through its representatives came to the location, found a rotten odor suspected to come from factory waste that was not neatly arranged by the factory manager.
- 2. There is an issue related to the construction of Biogas at Buatan II POM for which there has been no change to the Amdal document owned.

#### **Audit Team verification and response:**

- For the positive things that have been done will be maintained and improved towards a better direction by the management company.
- In dealing with rejuvenation activities, of course there are many social issues that arise from environmental impacts. In this case, the company has conducted an assessment of the social impact aspects which then makes 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:

Related to the pollution issue from the Buatan group:

- 1. The Company has identified the source of the odor originating from the drainage pipe to the Land Application area which is underground in the Buatan plantation area experiencing a leak (caused by a pipe crossing the road passed by a tractor that was about to carry TBS and broke and leaked). After reports from the community, the response team from Buatan POM has made repairs and immediately replaced the pipe and diverted the pipe so that it is not passed by vehicles or heavy equipment.
- 2. Related to the construction of Biogas at Buatan II POM;

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. Until surveillance 2.3, the Auditor Team has verified the 2009 Amdal document, but Biogas activities have not been included in the scope of the 2009 Amdal document. For details, refer to indicator 3.4.1.

#### 3 Feedbacks:

#### Dinas Ketenagakerjaan Kabupaten Pelalawan/Provinsi Riau:

Bpk. Sondang Leni



- In general, PT Inti Indosawit Buatan Group POM has established good communication with the Manpower and Transmigration Office Pelalawan Regency.
- PT Inti Indosawit Subur Buatan Group POM has complied with laws and regulations related to employment, namely;
- PT IIS has provided all normative rights for employees, such as salaries listed in the provincial minimum wage, leave rights, employees registered with the workers' social insurance (BPJS), allowances for religious festivals, provision of facilities (housing, electricity, clean water, medical clinics, school buses, places of worship, personal protective equipment, work tools, etc.).
- There have been no industrial relations disputes since last year.
- There have been no identified problems 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.

#### Issue:

PT IIS – Buatan Group still employs Casual Daily Workers for harvesters (especially harvesters who have been recruited previously).

#### **Audit Team verification and response:**

The main work (core work) is done by permanent workers (SKUH and SKUB), although there are still harvesters whose main work is still done by non-permanent workers (PHL) where these harvesters have been recruited for a long time and the Company has created a promotion program for PHL harvesters to become permanent SKUH workers. This promotion program is carried out every semester every year, here is the realization of the SKUH promotion program until June 2024:

#### A. Buatan I:

The progress of the promotion program for harvesters at the PT IIS Buatan I Plantation and PKS until June 2024 is as follows:

- In 2023, 21 PHL harvesters were promoted to SKUH
- In 2024, 5 PHL harvesters were promoted to SKUH
- The old harvesters with PHL status still number 25 harvesters and will soon be promoted to SKUH in semester II/2024.

#### B. Buatan I POM:

- In 2024, 11 PHL processing workers have been promoted to SKUH
- Palm oil processing workers at Buatan I PKS who have PHL (non-permanent) status, until June 2024 still number 4 people and will soon be promoted to SKUH in semester II/2024.

The company has committed that after May 2024 there will be no more recruitment of harvesters with the status of Non-Permanent Workers (PHL/PKWT), and the harvesters recruited are those with SKUH (permanent) status with a probationary period of 3 months (in accordance with the Job Creation Law-Perpu No. 6 of 2023 and PP No. 35 of 2021).

#### 4 Feedbacks:

Penghulu/Kepala Desa Bukit Harapan (Kab. Siak) - Buatan I:

Bpk. Ibu Lasmi

Penghulu/Kepala Desa Lalang Kabung (Kab. Siak) - Buatan II:

Bpk. Nanang



- 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 the Artificial Plantation I and II areas.
- There are no issues related to operational practices that violate human rights.
- The CSR program is always carried out every year. The company always sends its representatives to the Musrembang negotiations/discussions

#### **Audit Team verification and response:**

- It is a positive response, no further response is required.
- It is recommended that PT Inti Indosawit Subur can maintain communication with the community and village officials.
- The CSR program that will be developed is in accordance with the community empowerment program and guidance and coaching.
- The last Musrembang was held on February 29 in Pelalawan District.

#### 5 Feedbacks:

#### Serikat Buruh -PUK SPPP SPSI:

Siswanto selaku Ketua PUK SPSI PBD

- Communication has been well established through meetings with PT IIS management. Meetings between the company and employees are held whenever a problem occurs and requires discussion.
- The company has provided training to workers to improve their knowledge and skills.
- The company has a policy to prohibit 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.
- Worker salaries follow the minimum wage set by the Riau Provincial Government for 2023
- There is a joint work agreement between the company and employees through a Collective Labor Agreement (PKB) for the period 2022-2024.

#### Gender Committee:

Mrs. Selvia JH (Head of the Gender Committee at PT IIS - Buatan Group)

- 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 check-up for sprayers and fertilizer applicators.
- All female workers in the sprayer and fertilizer team must take a pregnancy test at the company clinic, once a month.
- There is no indication that the company is committing sexual harassment, no indication of gender discrimination, no indication of human rights violations, and forced labor.

#### Issues in Buatan I:

There is a case of sexual violation of workers among workers (affair), the Chairperson of the Gender Committee has followed up on this case and has recorded, investigated, mediated and also taken preventive/rehabilitative measures related to the case.

#### **Audit Team verification and response:**

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



- The audit team will continue to monitor POM PT Inti Indosawit Subur Buatan Group regarding Plantation management and performance monitoring.
- 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.

#### Gender Issues Committee-Buatan I:

Based on the results of an interview with the Chairperson of the Gender Committee, Mrs. Silvia Junita Harefa, there was a case of infidelity between workers on June 15, 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 Chairperson of the Gender Committee, acknowledged by the field assistant (Afd. 3) and verified by the Public Relations and Estate Buatan I management. An investigation has been carried out on this case until mediation was carried out to resolve and determine an action plan so that it does not happen again (rehabilitation), namely: both parties agree not to live in company housing and separation of work units.

#### 6 Feedbacks:

- 1. <a href="https://suarafaktual.com/belum-kantongi-ijin-lingkungan-pembangunan-biogas-milik-pt-iis-sudah-mulai-beroperasi/">https://suarafaktual.com/belum-kantongi-ijin-lingkungan-pembangunan-biogas-milik-pt-iis-sudah-mulai-beroperasi/</a> (June 18, 2023) Biogas Development in Buatan II
- 2. <a href="https://www.busernews24.com/read-3472-2023-04-15-bau-busuk-menyeruak-diduga-berasal-dari-limbah-pt-iis-kebun-buatan.html">https://www.busernews24.com/read-3472-2023-04-15-bau-busuk-menyeruak-diduga-berasal-dari-limbah-pt-iis-kebun-buatan.html</a> (April 15, 2023) Pollution of a tributary in Lalang Kabung Village, Buatan II POM
- 3. <a href="https://putusan3.mahkamahagung.go.id/pengadilan.html">https://putusan3.mahkamahagung.go.id/pengadilan.html</a> (Register: 04-01-2023 Decision: 23-02-2023 Upload: 07-03-2023)

#### **Audit Team verification and response:**

- https://suarafaktual.com/belum-kantongi-ijin-lingkungan-pembangunan-biogas-milik-pt-iis-sudah-mulai-beroperasi/ (June 18, 2023) Biogas Development in Buatan II
  Based on an interview with Mr. Chandra (DLH Riau Province, Amdal 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 Amdal addendum and only needs to make changes to the environmental management matrix which will later be monitored and reported every 6 months.
- https://putusan3.mahkamahagung.go.id/pengadilan.html (Register: 04-01-2023 Decision: 23-02-2023 Upload: 07-03-2023)
   In the ASA2.3 audit, the auditor has also verified information related to KKPA Delima Sakti as a supplier of TBS to PKS I Buatan, the information was obtained by the auditor from online media. The information is related to the allegation from the Firmar Abadi Foundation that KKPA Delima Sakti is located in a forest area. The auditor has verified and interviewed the Legal Manager SSL Department, the document has been verified and explained in 2.3.1 above.
- https://www.busernews24.com/read-3472-2023-04-15-bau-busuk-menyeruak-diduga-berasal-darilimbah-pt-iis-kebun-buatan.html (April 15, 2023) – Pollution of a tributary in Lalang Kabung Village, Buatan II POM

  This has been position with the Polalayan Research DLU above.

This has been verified with the Pelalawan Regency DLH above.



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
-	-	-	-	-	-

PT IIS – Buatan Estate has established since 1988 and has planting palm oil since 1988 - 1991. Currently the palm oil has been replanted since 2014 - 2023 and still continue until 2024.

Previou	s land owner / user comment
	Feedbacks: -
	Audit Team verification and response: -

#### 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 I POM 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 I POM is Choose an item.

Report prepared by	Acceptance of Assessment Conclusion
Name: Eko Prastio Ramadhan	Name:
	Putu Ghryate Yonata Aksa
Company Name:	Company Name:
On behalf of BSI Services Malaysia Sdn.Bhd.	PT Inti Indosawit Subur – Buatan I POM
Title: Client Manager / Lead Auditor	Title: Sustainability Manager
Signature:	Signature:
1	(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)
Date: 31 July 2024	Date: 23 September 2024



#### **Appendix A: Summary of Findings**

Criterio	on / Indicator	Assessment Findings	Compliance			
_	Principle 1: Behave ethically and transparently  Drive ethical business behaviour, build trust and transparency with stakeholders to ensure strong and healthy relationships.					
	1.1: The unit of certification provides adequate information to relevant stake s 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 -	There are no changes from the list of document types and information accessible to stakeholders established in this audit ASA 2.3. Company has listed the publicly document updated January 2023 in the form on "Daftar Dokumen dan Informasi untuk Diakses Publik PT Inti Indosaw. Subur - Buatan Group", where there are 32 types of documents grouped in several aspects which refers to RSPO principles and criteria, among others:  1. Location permit and principal permit (Izin Lokasi, Izin Prinsip)  2. Land titles/user rights (IPKH, Sertifikat HGU, HGB and IMB)  3. Occupational health and safety plans (Laporan Pelaksanaan P2K3)  4. Plans and impact assessments relating to environmental and social impacts (AMDAL, Environmental licensing and Environmental Management Program)  5. HCV & HCS documentation (Conservation Management Plan, HCN Report, Social Impact Assessment and HCV Identification Report)  6. Pollution prevention and reduction plans (Environmental Management Program, Hazardous waste Report-Laporan LB3, Land Application Report and also Report of physical and chemical analysis of river water)  7. Details of complaints and grievances (Procedure of Information handling, Procedure of "keluhan konfik lahan" and records of and	y f f f it d d l			

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		recording of deliberation process and compensation).	
		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 log book.	
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders.  - Minor compliance -	PT Inti Indosawit Subur — Buatan Group has provide the public information in Bahasa Indonesia. The information contain in the document can be understand with all stakeholder. It was confirmed by audit team during stakeholder consultation. There are 32 information accessible by stakeholder as explain above in indicator 1.1.1.	Complied
		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.	



1.1.3	(C) Records of requests for information and responses are maintained Critical (Major) compliance -	There are no changes, that the requests for information are responded by the department concerned in accordance with their authority. The company has developed a matrix describing the status of each information request and responsible to respond into.	Complied
		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 organisation raised 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).	
		There are no changes related to the procedure of consultation and communication is records on SOP No. AA-GL-5008.1-R1: <i>Penanganan Permintaan Informasi Stakeholder</i> . The consultation and communication procedure was socialized to stakeholder, on 2024 the socialized was conducted on 12 February 2024 to all workers and on 19 February 2024 to 23 stakeholders.	
		Records of response of request information documented in the same book, consist of person handle the request, information given and acknowledgement from the person in-charge and signature. Record of incoming communication available in each estate and mill unit.	
		The request for information was recorded on Log Book "Surat Masuk dan Keluar" on period 2023-2024, taken example:	
		Buatan I Estate and Mill:	
		- P2K3 report for the third quarter of 2023 was reported on 9 October 2023 to the Pelalawan District Manpower Office.	
		- P2K3 report for the fourth quarter of 2023 was reported on 18 January 2024 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.
- Environmental permit report (RKL-RPL) for the second semester of 2023 to DLH Pelalawan Regency and Disbun Pelalawan Regency on 19 June 2024.
- 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 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.

#### **Smallholder Scheme**

Request Information and response from Stakeholder is documented into a log book "*Kebun Plasma Buatan*", up to June 2024, there was 15 information requests in Plasma/smallholder Division.

#### Sample seen:

- Request information from SMK Pangkalan Kerinci on 20 March 2024, related permohonan penguji kompetensi, has been responded by the Scheme Manager on 21 March 2024.
- Request information from KUD SP-IV on 20 March 2024, related permohonan bantuan perbaikan jalan, has been responded by the

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		Scheme Manager on 27 March 2024.	
		<ul> <li>Request information from KUD SP VIII on 24 April 2024, related permohonan timbang kosong, has been responded by the Scheme Manager on 24 April 2024.</li> </ul>	
		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 by a stakeholder. The consultation and communication procedure was socialized to stakeholder on 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.	Complied
		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".

#### Smallholder Scheme

The scheme smallholders have a mechanism of consultation and communication in "Mekanisme Komunikasi, Konsultasi dan Keluhan", dated 3rd January 2011. The procedure has been communicated to all members on April 2023 and also recorded into the "Buku Pintar" 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, based on the Management Decree, as follows:

- 1. Decree/SK No. 6 Kpts/KUD-BM/II/2018 dated 10 February 2018 concerning the appointment of communication and consultation officers at KUD Bhakti Mandiri to Bpk. Sugeng.
- 2. Decree/SK No. 6 Kpts/KUD-JM/I/2021 dated 09 January 2021 concerning the appointment of communication and consultation officers at KUD Jaya Makmur to Bpk. Wilis.
- 3. Decree/SK No. 4 Kpts/II/2018 dated 15 February 2018 concerning the appointment of communication and consultation officers at KUD Sejahtera to Bpk. Agusmiran.

		4. Decree/SK No. 2/Kpts/KUD-SR/I/2020dated 11 January 2020 concerning the appointment of communication and consultation officers at KUD Sumber Rezeki to Bpk. Sumarlan.  Request Information and response from Stakeholder is documented into a log book "Kebun Plasma Buatari", up to June 2024, there was 15 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 I 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).  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.	Complied
Criteria	<b>1.2:</b> The unit of certification commits to ethical conduct in all business operations.	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 ( <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.	
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.  - Minor compliance -	Buatan I POM, Estate and Scheme Smallholder:  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.	Complied
		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 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 I 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.	



Principle 2: Operate legally and respect rights  mplement legal requirements as the basic principles of operation in any jurisdiction.				
Criteria 2.1: There is compliance with all applicable local, national and ratified	d international laws and regulations.			
(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 tentang Pemberian HGU atas nama PT. Inti Indosawit Subur, atas tanah di Kabupaten Kampar seluas 5,781.47 Ha".  - HGU (Land titles) No.01, 1993, dated June 19th 1993. for Buatan Estate (5,781 Ha);  - IMB (Building licenses), there were 6 permits, such as; No.106/2009, 71/2009, 09/2009, 11/1992, 56/2009, 117/1997.  - The Company has shown compliance related OHS aspect such as Minister of Manpower Regulation No. 4 of 1987 concerning the Committee for Occupational Safety and Health and Procedures for Appointing 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.  - Has been manage the hazardous waste and domestic waste in accordance with applicable regulation (refer to criteria 7.3).	Complied		



er to criteria 7	a 7.11). Scheme Smallhold	lau	
name	Scheme Smallhoid	NPWP N	lo.
akti Mandiri			815.1-222.000
a Makmur		01.746.7	748.1-222.000
ahtera	62.084.444		144.9-222.000
nber Rezeki		02.174.8	813.2-222.000
ness Permit Do	Document for Sch	eme Small	holder
o name	Туре	I	Document No.
	Surat Izin Usaha		523.33/SITU/II/ 2019/06
	Surat izin Usaha		137/BPMP2T/SI TU/2018/267
	Surat Izin Usaha		523.33/SITU/VII /2019/016
	Surat Izin Usaha	Tempat !	523.33/2018/13
ness registratio	tion number		
O name I	Registration nu	mber	
nber Rezeki I	NIB: 28042200	16643	
ahtera I	NIB: 29052400	55711	
a Makmur I	NIB: 11072400	87701	



		Bhakti Mandiri NIB: 0307240087607
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 -	An evaluation of the latest legal compliance was carried out on May 2024 by Humas Group Buatan on Document "Evaluasi Kepatuhan Hukum PT Inti Indosawit Subur - Group Buatan" with the result that all regulations has been implemented by the company. The list of regulations is available for all levels of management and can be given at any time to all levels of management in the form of hardcopy or softcopy.  The document also contains the latest regulations that have been ratified and implemented by the company.  However according to document of "Evaluasi Kepatuhan Hukum PT Inti Indosawit Subur - Group Buatan" it was noted that:  - Reference of fulfillment related to minimum wages still uses the Keputusan Gubernur Riau tentang Upah Minimum Kabupaten/Kota di Provinsi Riau Tahun 2019 Nomor: Kpts. 1198/XI/2019 concerning the Regency/City Minimum Wage in Riau Province, which is obsolete and should use the Riau Governor's Decree Number: Kpts.7618/XI/2023 concerning the Regency/City Minimum Wage in Riau Province in 2024.  - In the list of regulation also noted that there were some relevant regulation that has not been included in the evaluation list such as:  ✓ Kepmenaker No 88 tahun 2023 tentang Pedoman Pencegahan dan Penanganan Kekerasan Seksual di Tempat Kerja  ✓ Kepmenaker No 2 tahun 2023 tentang Perdoman Pencegahan dan Penanganan Kekerasan Seksual di Tempat Kerja  ✓ Kepmenaker No 2 tahun 2023 tentang Peraturan Pelaksanaan PP Nomor 66 tahun 2014 tentang Kesehatan Lingkungan.  ✓ Peraturan Menteri Lingkungan Hidup dan Kehutanan No P.106/MENLHK/SETJEN/KUM.1/12/2018 Tahun 2018 tentang Perubahan Kedua atas peraturan Menteri Lingkungan Hidup dan Kehutanan Nomor P.20/MENLHK/SETJEN/KUM.1/6/2018

		<ul> <li>✓ Permenaker 38 tahun 2016 tentang Keselamatan dan Kesehatan Kerja Pesawat Tenaga dan Produksi</li> <li>✓ Permenaker 9 tahun 2016 tentang Keselamatan dan Kesehatan Kerja dalam Pekerjaan pada Ketinggian.</li> </ul>	
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 ""Laporan Pemeriksaan dan Perawatan Patok Batas". 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 16 (0° 25′ 44.50″ N and 101° 49′ 17.16″ E)  - BPN 14 (0° 26′ 22.86″ N and 101° 49′ 09.69″ E)  - BPN 13 (0° 25′ 47.94″ N and 101° 52′ 17.25″ E)  - BPN 11 (0° 27′ 27.73″ N and 101° 52′ 35.01″ E)	
		For the scheme smallholders, during field visit has known that the boundaries poles are available for all plots. The KUD has carried out monitoring of boundary poles, the last monitoring was carried out on June 2024, sample seen for boundary poles monitoring KUD Bhakti Mandiri, KUD Sumber Rejeki, KUD Jaya Makmur and KUD Sejahtera. There is no indication of dispute among the plots as well with external parties.	



2.2.1 A list of contracted parties is available.

- Minor compliance -

Until this surveillance 2.3 audit or the 2023-2024 period, there are 13 contractors in collaboration with PT IIS-Buatan I Group, for FFB supplier, CPO transporter and Transportation.

The following is a list of Contractors at PT IIS- Buatan I Group in the 2023-2024 period:

NO	NAMA PT. / CV.	NAMA	ALAMAT	CONTACT NUMBER	LINGKUP PEKERJAAN
1	CV. JASA SAHABAT ABADI		Jl. Besar Kisaran, Desa Sidomulyo Kec. Pulo Bandring, Medan	082166022417	ANGKUT CPO, CPKO
2	CV. BUANA JAYA BERSAMA		Jl. Siak II, RT. 02 RW.03, Kec. Payung Sekaki, Kel. Bandar Raya, Pekanbaru		ANGKUT CPO, CPKO
5	CV. JASA BERSAMA	Sujiwo	Jl. Siak No. 2, Palas, KB 77 KM 15, Pekanbaru		ANGKUT PKE, CANGKANG

This also includes cooperation contracts in terms of FFB suppliers with second parties, as follows:

FFB Supplier	Initial	Type_Supplier	Komoditi_Group
BERKAH MAKMUR BERSAMA	BMB	1 - SUPPLIER TBS	External FFB supplier
PNR, CV - SAM	PNR	1 - SUPPLIER TBS	External FFB supplier
PARDAMARAN JH,CV	PJH	1 - SUPPLIER TBS	External FFB supplier
KINABALU PERKASA, PT	KBP	1 - SUPPLIER TBS	External FFB supplier

List of Contractor Joi As of July 2024	bs Buatan I			
Contractor	No. of Vehicle	Contract No.	Jobs Type	Term of cooperation
	BM 9795 CI, BM 8640 CI,			•
Parlaungan Panjaitan	BM 88040 CU, BM 8861 CU	002/E2KBN/01/2024	Transport of FFB and soil	1 April - 30 June 2024
Sri Rahayu	BM 7165 SA	003/E2KBN/01/2024	Transportation of school children	1 April - 30 June 2024
Juceplin Halim	BK 7321 FY	009/E2KBN/01/2024	Transportation of school children	1 April - 30 June 2024
	BM 9087 SZ, BM 8650 BF,			
Jhon Riadi	BM 8850 SU, BM 9236 SL	010/E2KBN/01/2024	FFB and soils transportation	1 April - 30 June 2024
	BM 9790 SC, BA 8312 OU,			
Hasnul Anjani H	BM 8530 CI, BK 8959 AB	011/E2KBN/01/2024	FFB and soils transportation	1 April - 30 June 2024
	BM 9231 CU, BM 9700 CU,			
Supatmi	BM 9431 CU	012/E2KBN/01/2024	FFB and soils transportation	1 April - 30 June 2024

Non conformance:

Noncompliance



		There is a contractor that is not included in the list of contractors for the 2024 period, namely PT Permata Indo Sejahtera (Outsourcing Services). Furthermore, the cooperation contract document that has been agreed upon and signed by both parties (PT IIS and PT Permata Indo Sejahtera) has not been shown.	
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 -	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/materai, as follows:  - FFB Sale and Purchase Contract - Kontrak Jual Beli TBS No. 08/TBS/IIS/2020 dated 20 June 2022 colaboration related to FFB Supplier between PT IIS Buatan I and Asosiasi Petani Sawit	Complied
		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 I and CV Pardamaran.	
		- FFB Sale and Purchase Contract - Kontrak Jual Beli TBS No. 117/TBS/IIS/2021 dated 19 ctober 2021 colaboration related to FFB Supplier between PT IIS Buatan I 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.

List of Contractor Jol As of July 2024	os Buatan I			
Contractor	No. of Vehicle	Contract No.	Jobs Type	Term of cooperation
	BM 9795 CI, BM 8640 CI,			
Parlaungan Panjaitan	BM 88040 CU, BM 8861 CU	002/E2KBN/01/2024	Transport of FFB and soil	1 April - 30 June 2024
Sri Rahayu	BM 7165 SA		Transportation of school children	1 April - 30 June 2024
Juceplin Halim	BK 7321 FY	009/E2KBN/01/2024	Transportation of school children	1 April - 30 June 2024
	BM 9087 SZ, BM 8650 BF,			
Jhon Riadi	BM 8850 SU, BM 9236 SL	010/E2KBN/01/2024	FFB and soils transportation	1 April - 30 June 2024
	BM 9790 SC, BA 8312 OU,			
Hasnul Anjani H	BM 8530 CI, BK 8959 AB	011/E2KBN/01/2024	FFB and soils transportation	1 April - 30 June 2024
	BM 9231 CU, BM 9700 CU,			
Supatmi	BM 9431 CU	012/E2KBN/01/2024	FFB and soils transportation	1 April - 30 June 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
- 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:  - Kontrak Jual Beli TBS No. 08/TBS/IIS/2020 dated 20 June 2022 colaboration related to FFB Supplier between PT IIS Buatan I and	Complied
		Asosiasi Petani Sawit Swadaya Berkah Makmur Bersama.  - Kontrak Jual Beli TBS No. 109/TBS/IIS/2022 dated 30 June 2022 colaboration related to FFB Supplier between PT IIS Buatan I and CV Pardamaran.	
		- Kontrak Jual Beli TBS No. 117/TBS/IIS/2021 dated 19 ctober 2021 colaboration related to FFB Supplier between PT IIS Buatan I and CV Putra Naiko Raja Sonang.	
		- Transportation Agreement - <i>Perjanjian Pengangkutan</i> 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 - <i>Perjanjian Pengangkutan</i> 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 - <i>Perjanjian Pengangkutan</i> 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.

 Perjanjian Kerja Rehap/Perbaikan Rumah Type E Mineral - Work Agreement for Rehabilitation/Repair of Type E Mineral House No. 104/M2PBS/05/2024 dated 29 May 2024 work agreement between PT IIS and Supandri for the renovation of 16 Kopel worker housing.

This Cooperation Agreement document includes compliance with legality, rules and regulations as well as the prohibition of child labor (under 18 years) and acts of violence and coercion against workers, explained in article 7 concerning Responsibilities and Obligations.

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
- 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.



		Periodically (once a year) contractor evaluations are carried out by PT IIS Buatan I, the last evaluation was carried out in January 2024. The evaluation was carried out using a contractor evaluation form which contains the criteria: compliance with regulations and legislation (related to legality) quality of work, implementation of safety systems and occupational health and compliance with PT IIS's company policies.	
Criteria	2.3: All FFB supplies from outside the unit of certification are from legal sour	rces.	
2.3.1	<ul> <li>(C) For all directly sourced FFB, Palm Oil Mill (POM) requires:</li> <li>Information regarding the geolocation of FFB origins;</li> <li>Proof of ownership status, right/claim of the land by grower/smallholder;</li> <li>If relevant, valid planting/operational/trading license, or is part of a cooperative which allows the buying and selling of FFB.</li> <li>Critical (Major) compliance -</li> </ul>	Based on document review and interview with the FFB Third Party Division during ASA2.3, it was known that PT Inti Indosawit Subur – Buatan I POM has chosen Mass Balance Module, the supply bases for Y2023-2024 as directly sourced of FFB are estate (Buatan Estate), scheme smallholders (KUD Bhakti Mandiri, KUD Jaya Makmur, KUD Sumber Rejeki and KUD Sejahtera) and third parties from CSV Program namely Asosiasi Berkah Makmur Bersama. The information related geolocation, proof of ownership status, and trading license a cooperative has shown during audit.  For directly FFB supplier, verified document during ASA2.3 is the same before. There is no change related to the data of Asosiasi Berkah Makmur Bersama, as follows:  Asosiasi Berkah Makmur Bersama:  Business permit/Surat Izin Usaha (SIUP) Mikro: No. 14.12/SIUP III/2017/05 dated 06/03/2017 from Bupati Siak.  Placement Business permit/Surat Izin Tempat Usaha (SITU) Mikro: No. 523.33/SITU/III/2017/05 dated 09/03/2017 from Bupati Siak.  Akta Notaris/Notary Dead: No. 02 dated 7/03/2017 from Defy Kristanty SH.  Geolocations: 0°30′43.074″N, 101°46′42.79″E	Complied

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- Proof of ownership, example:
  - a. Sertifikat Hak Milik (SHM)/ land ownership certificate on behalf Kasimin, with area 18.76Ha
  - b. Sertifikat Hak Milik (SHM)/ land ownership certificate on behalf Tjonh Tjin Hwat, with area 19.04Ha
  - c. Sertifikat Hak Milik (SHM)/ land ownershipo certificate on behalf Yusnan Fatima, with area 19.03Ha

During audit ASA2.3 auditor also has verified the information related to the KKPA Delima Sakti as FFB supplier to the Buatan I POM, information has obtained by the auditor from online media. The information is related to the allegation from Yayasan Firmar Abadi that KKPA Delima Sakti is in a forest area. Auditor has carried out the verification and interview wit Legal Manager – SSL Department, verified document as follows:

- a. RI Supreme Court Decision No. 3/PDT-LH/2023/PT PBR decided on 15 February 2023 which was read out in the open court decision on 23 February 2023 stating:
  - Page 7 Paragraph 2: based on a letter from the Head of the Balai Pemantapan Kawasan Hutan Wilayah XIX Pekanbaru No: S.426/BPKH are Production Forest Areas that can be converted (Hutan Produksi yang dapat di Konversi/HPK) and Permanent Production Forest Areas (Hutan Produksi Tetap/HP), this is also confirmed by the Decree of the Minister of Environment and Forestry of the Republic of Indonesia No. SK.903/MenLHK/Setjen/PLA2/12/2016 dated 7 December 2016.
  - Page 11 (point 3): States that the status of the disputed object covering an area of ±2,000 Ha is a Forest Area.



- b. Submission of Cassation/Kasasi from PT Inti Indosawit Subur, in accordance with the Memorandum of Cassation received by the Supreme Court No. 10 April 2023. Memorandum of Cassation against Pekanbaru High Court Decision No. 3/Pdt-LH/2023/PT Pbr dated 23 February 2023 Jo. Pelalawan District Court Decision No.11/Pdt.G/LH/2022/PN Plw dated 3 November 2022 in the case between PT IIS against the Firmar Abadi Foundation and the Riau Provincial Government (Governor), cq the Head of the Riau Province Environmental and Forestry Service. The cassation was addressed to the chairman of the Supreme Court on Jln Merdeka Utara, Jakarta. It was explained that:
  - PT IIS received the release of notification of the appeal decision in case No. 3/Pdt.LH/2023/PT Pbr dated 23 February 2023 Jo. No.11/Pdt.G/LH/2022/PN Plw dated 3 November 2022 on 24 March 2023 and filing a cassation in accordance with the Deed of Statement of Request for Cassation No. 11/Pdt.G/LH/2022/PN Plw dated 4 April 2023, with a cassation memo submitted on 10 April 2023, so that the submission of the a quo cassation memo has met the deadline as required by the legal provisions applicable to it.
  - The cassation applicant did not commit any unlawful act, because the object in dispute does not belong to the cassation applicant (PT IIS) and is not a forest area because there is a community property rights certificate (SHM/Sertifikat Hak Milik) on it.
  - The applicant has been managing plantations since 1998.
  - The disputed object is controlled by the community who have had a certificate of ownership (SHM/Sertifikat Hak Milik) since 2008 and the community has never received compensation from the Government regarding the determination of the forest area in the disputed object, so the determination of the forest area

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is flawed because it is in conflict with Article 68 of Law no. 41/1999 concerning Forestry, which regulates that every person has the right to receive compensation for the loss of rights to their land as a result of the establishment of a forest area in accordance with the provisions of applicable laws and regulations.

- In the a quo case, no compensation was received by the members of the KUD Delima Sakti community, and the ownership rights certificates of the KUD Delima Sakti members were never canceled by any agency, so it is certain that the object of the dispute is not a forest area.
- The disputed object has been certified in the name of the community since 2008, while the cassation applicant is not the owner of the disputed object.
- That the land subject to dispute is not a forest area, it is proven
  that since the cassation petitioner carried out cooperation in
  developing a partnership pattern plantation with KUD Delima
  Sakti in 1998, the relevant agency had issued the necessary
  permits and recommendations in 1997 and until the a quo
  cassation petition was submitted there has never been a
  cancellation of the permit held by the applicant for cassation.
- That legal considerations have violated the non-retroactive principle, namely the principle that prohibits laws from being applied retroactively. Where the rules in force at that time cannot be applied to past actions before the enactment of the law, which aims to ensure legal certainty.
- c. Letter of Power of Attorney from the people of Lalang Kabung Village, Pelalawan District, Pelalawan Regency, Riau Province to the Minister of Environment and Forestry of the Republic of Indonesia cq Director General of Forestry Planning and Environmental

		Management Jakarta dated 13 October 2023. Letter explaining the	
		Power of Representative (In*r* M*n *u*) as the recipient of the Power of Attorney for 432 Family Heads in Lalang Kabung Village, requested a request to complete the arrangement of the forest area in accordance with applicable government regulations.	
		d. Cassation Decision from the Supreme Court, accepted and granted the defendant's cassation request. In accordance with decision No.756K/PDT/2024 dated 21 March 2024, and the status of cassation is granted "Kabul".	
		Based on the evidence above, PT IIS Buatan I POM as the recipient of the fruit from the Delima Sakti KKPA has taken action to prove that the Delima Sakti KKPA is a legal area, and the actions taken by UM are in accordance with the stages of fulfilling the laws and regulations in Indonesia.	
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.	During ASA2.3, there are third party's supplier as Indirectly sourced FFB, the suppliers are CV PNR SAM, CV Pardamaran, and PT Kinabalu Perkasa.	Non- compliance
	- Minor compliance -	Based on interview with Create Share Value (CSV) staff and Mill Manager obtained information that both suppliers have been verified and visited by FFB purchasing staff. By visited the suppliers land and tagged the coordinate, mill expected the FFB source comes from traceable and responsible area.	
		Verified document as follows:	
		<ol> <li>PT Kinabalu Perkasa: Business permit: NPWP 01.062.129.9- 092.000, NIB 0903230059223, Akta Notaris No. AHU- 0010029.AH.01.02 TAHUN 2023.</li> </ol>	
		2. CV PNR SAM: Agreement: No. 117/TBS/IIS/2021 between CV PNRS (Putra Naiko Raja Sonang) and PT Inti Indosawit Subur	



		216.000; 480/M.04.0 3. CV Pardam CV Pardam 2022; Area permit/Sura	Business 1/DPMPTS taran: Agr aran JH ar : 575 Ha at Izin Us taga OSS	permit, SP/III/201 reement: nd PT Inti ; NPWP: saha (SIU – Badan	/Surat I 17 dated 1 No. 109/ <sup>-</sup> i Indosawi 43.924.73 JP) Mikro:	zin Usa 4 March 2 FBS/IIS/20 t Subur d 7.0.216.0 NIB 261		: 1 2 5 3
		However, the information proof of ownership nonconformity.						
Impleme	e 3: Optimise productivity, efficiency, positive impact and resilience ent plans, procedures and systems for continuous improvement.  3.1: There is an implemented management plan for the unit of certification in the continuous improvement.		lona-term	economic	and finar	ncial viabil	itv.	
3.1.1	<b>(C)</b> A business or management plan (minimum of three years) is documented and where applicable, includes a jointly developed business case for Scheme Smallholders.	The Certificate Hold Estate, Mill and Sm. 1. Projection -	der has fivallholder's	/e years' ι scheme ι	managem	ent plan c	overing Ow	•
	- Critical (Major) compliance -		2024	2025	2026	2027	2028	
		Unit	Ton	Ton	Ton	Ton	Ton	
				56.050	FO 00F	62.707	67,976	
		FFB Production – Buatan Estate	51,529	56,250	59,895	63,797	07,970	
			51,529	56,250	49,638	47,156	44,798	



		KUD Sumber Rejeki KUD Sejahtera)	,						
		FFB Production - Third Parties	- 200,00	210,00	0 220	,000 2	231,525	243,101	
		2. Production	n – CPO/	PK (MT)					
		Description	202	24 202	5 2	2026	2027	2028	
		FFB processed	257,50	00 265,00	0 273	,300 2	282,476	292,643	
		СРО	47,43	32 48,62	8 50	,287	52,117	54,139	
		PK	14,42	20 14,57	5 13	,938	14,830	15,510	
		3. OER and	KER		•				
		Description	202	24 202	5 2	2026	2027	2028	
		OER (%)	18.4	42 18.3	5 1	8.40	18.45	18.50	
		KER (%)	5.6	5.5	0	5.10	5.25	5.30	
		4. Production	n cost		•	_			
		Description	202	24 202	5 2	2026	2027	2028	
		IDR/Ton FFB	88.0	02 95.0	6 10	2.67	110.88	119.75	
			J.	1					
3.1.2	An annual replanting programme projected for a minimum of five years	Estate							Complied
	with yearly review, is available Minor compliance -	An annual replanting program projected was as follows (updated in May 2024:							
		Estate	Unit	2023	2024	2025	202	26 2027	]
		Buatan Estate	На	-	-	402	-		1

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#### **Scheme smallholders:**

There are a replanting program (update January 2024) as follows:

	20	20	20	21	2022		
Unit	Program (Ha)	Actual (Ha)	Program (Ha)	Actual (Ha)	Progra m (Ha)	Actual (Ha)	
KUD Bhakti Mandiri – SP 3	386	386	-	-	-	-	
KUD Jaya Makmur – SP 4	174	174	-	-	-	-	
KUD Sumber Rezeki - SP 5	-	-	-	-	-	-	
KUD Sejahtera – SP 6	-	-	-	-	-	-	

	20	23	2024		2025		
Unit	Program (Ha)	Actual (Ha)	Program (Ha)	Actual (Ha)	Progra m (Ha)	Actual (Ha)	
KUD Bhakti Mandiri – SP 3	1		176	-	208	1	
KUD Jaya Makmur – SP 4	172		292	-	282	-	
KUD Sumber Rezeki - SP 5	300	-	280	-	-	-	
KUD Sejahtera – SP 6	1	-	256	-	284	1	

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		1-1	ı	1	1		,	
		Unit	Program	Actual	Program	Actual		
		I/UD DI III	(Ha)	(Ha)	(Ha)	(Ha)		
		KUD Bhakti Mandiri – SP	210	-	-	-		
		Mariuii						
		KUD Java	_	_	-	_		
		Makmur – SP						
		4						
		KUD Sumber	238	-	-	-		
		Rezeki - SP 5						
		KUD	336	-	-	-		
		Sejahtera –						
		SP 6						
		Based on do	ocument v	erification	and inter	view with	plasma manager	
							ear 2023 in KUD	
							Rezeki and KUD	
			•	•	•			
							financial problem	
							cess of obtaining	
		government	assistance	funds for	replanting	<b>.</b>		
3.1.3	The unit of certification holds management review at planned term	Based on inte	arviow wit	h managa	mont durin	α Λ <b>S</b> Λ2 3	it was known that	Complied
3.1.3	according to the scale and nature of the activities undertaken.							Complica
							shed management	
	- Minor compliance -						ature according to	
		the SOP Nom	nor: AA-SC	)P-ES-600	1-R5 dated	l 1 August	2020.	
		Management	review ha	as conduct	ed on 23 [	December 2	2023, attended by	
		_					, Head Assistant,	
							The management	
							the company for	
							including scheme	
		smallholder a	and best p	oractices b	oth in Mil	and Estate	e, Result of RSPO	
		Internal Audi	it for Estat	e and Mill				
						annual int	ornal audit activity	
							ernal audit activity	
				ny (VA)	and visit	∟ngineerii	ng (VE). Verified	
İ		document as	tollows:					

...making excellence a habit."



- Report No. VA-KBN-APR-FULL-14042023-Full Report, date of visit 14 19 April 2023. There were no main issues in this estate, however current issues and recommendation of immature area related to weeding control in circles/path and interrow, pest & disease, supplying, consolidation, manuring, and road maintenance. The unit has made a corrective action plan and the issues has been closed in May 2023. Until this audit ASA2.3, organization has implemented the corrective action to prevent the issues doesnot appear again.
- Visit Engineering on 08-13 July 2024 as per Report VE-PBS-JUL-FULL-08072024, there are some issues in the mill, for examples:
  - Loading Ramp St: Some of the capstan straps rub directly against the iron material and the capstan gear box is not well maintained.
  - Sterilizer St: The level of the continuous drain pipe installed is quite high compared to the sterilizer body.
  - Press and Digester St: there is still a leak in the digester engine from the body and chute.
- Report visits scheme smallholder "Kunjungan Head Smallholder ke Kebun Plasma Buatan" conducted by Coordinator of Smallholder in Plasma Buatan Group, sample seen visit in March 2024 based on the report there is an issue related to the pest and disease. The unit has made a corrective action plan and the issues has been closed in May 2024.

There was management review for Scheme Smallholder, the last one was conducted on 23 December 2023.

**Criteria 3.2:** The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.



3.2.1	<b>(C)</b> 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.	Based on document review during ASA2.3, there was no change of action plan for continuous improvement because ongoing process.	Complied
	- Critical (Major) compliance -	Buatan Estate:	
		One of the efforts to increase crop productivity is by "Improving Road Quality by Modifying Cross Drain" The objective is All Paths Accessible, longer cross drain replacement/repair lifetime and Longer cross drain replacement/repair lifetime.	
		Buatan I POM:	
		Improve yield CPO MT/Ha (OER)	
		Reduce oil losses on Press Fiber	
		Reduce oil losses on Heavy Phase	
		Reduce oil losses on Empty Fruit Bunch	
		Improve Quality Outside FFB	
		Labor Dependency	
		Management of overtime process	
		Management of overtime workshop	
		Kernel Shell Usage	
		Increase Boiler Equipment & Operations strategy	
		Technical Oil	
		Increase Improve OER	
		Social impact continuous plan has been identified as social impact assessment. Social management and monitoring plan has been determined and implemented.	

		Scheme Smallholder:	
		Based on document review, it was verified some of action plan in scheme smallholder is continuing from last year, for example:	
		<ul> <li>Problem: acceleration of the replanting program, the farmers are still questioning the production of topaz seedlings for old plants, in KUD which will be replanted. Action: Study tour to the KUDs that have successfully in their replanting program. Continuous improvement plan: Help in process of replanting proposition through PSR (<i>Peremajaan Sawit Rakyat</i>) Programme, initiated by the government.</li> </ul>	
		<ul> <li>Problem: consumption of solar fuel in FFB transport to POM; Action: routine maintenance and limitatiaon of FFB transport (max 8,000 kg). Continuous improvement plan: To monitor the volume of FFB transport</li> </ul>	
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.  - Minor compliance -	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 template was submitted.	Complied
Criteria	<b>3.3:</b> Operating procedures are appropriately documented, consistently impl	emented and monitored.	
3.3.1	(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.  - Critical (Major) compliance -	Buatan Estate & Scheme Smallholder:  Based on document review during ASA2.3, it was known that Estate has had Standard Operational Procedures (SOP) that covering entire	Complied
		<ul> <li>operational activity as follows:</li> <li>SOP AA-APM-OP-1100.01-R4 dated 5 September 2016: <i>Pembibitan</i> (Nursery).</li> </ul>	
		SOP AA-APM-OP-1100.02-R3 dated 10 June 2015: <i>Penanaman Areal Baru</i> (New Planting).	



- SOP AA-APM-OP-1100.03-R2 dated 24 July 2015: *Pembuatan dan Perawatan Jalan dan Jembatan* (Road and Bridge construction and maintenance);
- SOP AA-APM-OP-1100.04-R3 dated 7 December 2015: *Pembuatan dan Pemeliharaan Parit* (Drainage Construction and Maintenance).
- SOP AA-APM-OP-1100.05-R3 dated 23 November 2016: Konservasi Tanah dan Air (Soil & Water Conservation).
- SOP AA-APM-OP-1100.06-R6 dated 16 February 2017: *Menanam kacangan* (Planting cover crops).
- SOP AA-APM-OP-1100.07-R6 dated 16 February 2017: *Menanam Kelapa Sawit* (Planting Oil Palms).
- SOP AA-APM-OP-1100.08-R6 dated 7 December 2015: Pengendalian Gulma (Weed control).
- SOP AA-APM-OP-1100.09. R5 dated 26 December 2018: *Pemupukan* (Fertilizer application).
- SOP AA-APM-OP-1100.10. R6 dated 23 November 2016: Pengendalian Hama dan Penyakit (Pests & Disease Control).
- SOP AA-APM-OP-1100.11. R1 dated 1 February 2009: *Pestisida dan Pengendaliannya* (Pesticide Handling).
- SOP AA-APM-OP-1100.12. R3 dated 23 November 2016: *Kastrasi* (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: *Tunas Pokok* (Pruning).
- SOP AA-APM-OP-1100.14. R3 dated 16 February 2017: Sensus dan Identifikasi Pokok (Census and Palm Identification).



- SOP AA-APM-OP-1100.15. R2 dated 1 October 2010: *Sensus Produksi* (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: Pengelolaan Air (Water Management).
- SOP AA-APM-OP-1100.18.R3 dated 20 April 2015: *Potong Buah* (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).
- 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;
- SOP AA-MPM-OP-1400.04.R1 dated 1 February 2009: *Stasiun Pemisahan Berondolan* for Loose Fruit Separation;
- SOP AA-MPM-OP-1400.05-R1 dated 1 February 2009: *Stasiun Pengadukan dan Pengempaan* for Pressing Station;
- SOP AA-MPM-OP-1400.06-R1 dated 1 February 2009: *Stasiun Pemurnian* for Clarification;
- SOP AA-MPM-OP-1400.07-R1 dated 1 February 2009: *Stasiun Pemisahan Nut dan Fiber* for Nut and Fiber Separation;
- SOP AA-MPM-OP-1400.08-R1 dated 1 February 2009: Stasiun Kernel for Kernel Station;
- SOP AA-MPM-OP-1400.09-R1 dated 1 February 2009: Stasiun Boiler,



- SOP AA-MPM-OP-1400.10-R1 dated 1 February 2009: *Stasiun* Engine Room;
- SOP AA-MPM-OP-1400.11-R1 dated 1 February 2009: Stasiun Water Treatment;
- SOP AA-MPM-OP-1400.12-R1 dated 1 February 2009: Laboratorium;
- SOP AA-MPM-OP-1400.13-R1 dated 1 February 2009: *Stasiun Pengelolaan Limbah* for Palm Oil Mill Effluent Treatment;
- SOP Agronomy for scheme smallholder has been also established:
  - a. AA PLASMA PP KS 01 Nursery procedure
  - b. AA PLASMA PP KS 02 Pest and Disease Handling
  - c. AA PLASMA PP KS 04 Manuring Procedure
  - d. AA PLASMA PP KS 05 Harvesting procedure

There is no change about the SOP until this audit.

PT Inti Indosawit Subur – Buatan I 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-1400.14-R2 dated 1 September 2011: *Stasiun Penimbunan dan Pengiriman CPO dan Kernel* for CPO and PK Bulking and Despatch Operation;
- SOP AA-MPM-OP-1400.15-R1 dated 1 February 2009: Perawatan for Preventive Maintenance;
- SOP AA-MPM-OP-1400.19.R2 dated 1 September 2011: Manajemen dan Metode Menghitung Emisi Gas Rumah Kaca (GHG)
- SOP AA-MPM-OP-1400.18-R4 Book Keeping
- AA-MPM-OP-1400.17-R6 Traceability
- AA-MPM-OP-1400-17-R6 Ketertelusuran (Traceability) dated 1 September 2017



- AA-APM-OP-1100.02-R3 Penanaman Area Baru (New Planting)
- AA-SOP-ES-6001-R4 Audit Internal Sustainability (Internal Audit Sustainability)
- AA-KL-12-EFP Restorasi Riparian dan Areal di Sekitar Danau/Waduk dan Mata Air Lainnya (Restoration of Riparian Area or Near Area of Lake/Damp or Water Sources) dated 1 August 2010
- AA-HR-305.2-RO Rekrutmen dan Seleksi Karyawan (Recruitment and Selection of Employee).

There is no change about the SOP until this ASA 2.3 audit.

During onsite audit, auditor has conducted field visit to the Buatan Estate as follows:

- Harvesting in Buatan Estate at Block E19 Afd II. The implementation was good, the harvester can demonstrate the best management practices for harvesting and also safety working procedure.
- Barn owl box Block B19i Afd II. The management unit using natural predator to control rat infestation. According to the interview, there are 4 barn owl boxes to covering 780 Ha of Afdeling III.
- Chemical weeding Block A91z Afdeling I. Chemical weeding in circle and path by using herbicide with active ingredients isopropyl amine glyphosate and metil metsulfuron. The spraying activity using VVLV (very very low volume) sprayer to minimize the herbicide usage.
- Fertilizer application Block B19i Afd II. According to fertilizer recommendation, Buatan Estate conducted fertilizer application using.
- TSP with dosage 0.6 kg/palm. The fertilizer applicator can demonstrate the application and safety working procedure.
- EFB application Block Block B19i Afd 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 -	Based on document verification during ASA2_3, it was known that to ensuring field implementation consistent with procedures, organization has a mechanism such as Visit Agronomy (VA) and Visit Engineering (VE).	Complied
		VA Buatan Estate:  Report No. VA-KBN-APR-FULL-14042023-Full Report, date of visit 14 – 19 April 2023. There were no main issues in this estate, however current issues and recommendation of immature area related to weeding control in circles/path and interrow, pest & disease, supplying, consolidation, manuring, and road maintenance. The unit has made a corrective action plan and the issues has been closed in May 2023. Until this audit ASA2.3, organization has implemented the corrective action to prevent the issues doesnot appear again.	
		<ul> <li>VE Buatan I POM:</li> <li>Visit Engineering on 08-13 July 2024 as per Report VE-PBS-JUL-FULL-08072024, there are some issue in the mill, for examples: <ul> <li>Loading Ramp St: Some of the capstan straps rub directly against the iron material and the capstan gear box is not well maintained.</li> <li>Sterilizer St: The level of the continuous drain pipe installed is quite high compared to the sterilizer body.</li> <li>Press and Digester St: there is still a leak in the digester engine from the body and chute.</li> </ul> </li> </ul>	

		Scheme smallholders:	
		The scheme smallholder has prepared mechanism to check consistent implementation of procedures is in place by android apps namely "Pembina Sejati" in Buatan Smallholder. This android apps are very useful for smallholder staff and smallholder itself to reporting the daily activity such as harvesting, upkeep and replanting.	
		Based on Advisory Visit in Asa2.3, which states that chemical weed control is only apply in circle and path, harvesting, manuring and upkeep has become something that needs to be considered by plasma management.	
3.3.3	Records of monitoring and any actions taken are maintained and available.  - Minor compliance -	Certificate holder has maintained the records of monitoring and any actions taken; the record has shown during ASA2.3 audit. Verified samples for example the organization has conducted monitoring of operational activity in all levels of workers. Each field supervisor has equipped with monitoring sheets/worksheets. For example, harvesting supervisor collects harvesting record and quality of each harvester. The report submitted to estate manager daily, verified document namely "Formulir Pemeriksaan Ancak Pemanen" for period June 2024.  For Buatan I POM, daily operational activities are also recorded in daily	Complied
		worksheet by mill supervisor before reported to the Mill Manager.  To ensure the result of operational activity are 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 shall be implemented by respective staff.	
	<b>3.4:</b> A comprehensive Social and Environmental Impact Assessment (SEIA ment and monitoring plan is implemented and regularly updated in ongoing of		environmental
3.4.1	<b>(C)</b> SEIA in new planting or operation including mills, is conducted independently and participatively by involving the affected stakeholders,	,	Complied



inclusive of impact assessment from the smallholder/outgrower scheme (if any). The assessment is to be documented.

- Critical (Major) compliance -

assessment last year till the date of this audit, no new planting in PT Inti Indosawit Subur – Buatan Group plantation area.

The company have a SEIA documents such as:

- PT. Inti Indosawit Subur Buatan Group has demonstrated a document of Kerangka Acuan Studi Analisis Dampak Lingkungan (ANDAL) Perkebunan Kelapa Sawit Pola PIR-Transmigrasi dan Pabrik Minyak kelapa Sawit (PMKS) di Kabupaten Kampar, Indragiri Hulu dan Bengkalis, Propinsi Riau, 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.
- 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 28<sup>th</sup> September 2009. Mill capacity 60 tonnes FFB/hour.
- Kernel Crushing Plant and Biogas Plant; the EIA is available under document "Upaya Pengelolaan Lingkungan dan Upaya Pemantauan Lingkungan Kegiatan Pabrik Pengolahan Kernel PMKS PT Inti Indosawit Subur Buatan I" has approval based on letter No: 660/BLH-AM/2012/202 dated 27 February 2012. Capacity of KCP 260 MT/day. UKL UPL has been approved by Local authorities through letter No.660/BLH-AM/2012/202 dated February 2012.



Identified impacts: domestic solid waste, POME, hazardous waste, emission, dust, and noise from KCP activities.

• 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)
- 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.

#### 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:

- 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 smallholder schemes.	
		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.	
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 -	Environmental management and monitoring of PT Inti Indosawit Subur – Buatan Group has been stated in ANDAL Document "Matriks Rencana Pengelolaan Lingkungan dan Matriks Rencana Pemantauan Lingkungan". This management and monitoring plan valid until there are changes or revision to ANDAL document.	Non- compliance
		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 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 Smallholder scheme, 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,

		1	
		degradation on wildlife -> no hunting.	
		The Social Environmental monitoring and management report reported in regular basis each semester in "Laporan Pelaksanaan Izin Lingkungan".	
		The evidences of participation of affected stakeholders in SEIA Management and Monitoring is not available. And, during audit the Social Impact Monitoring for Year 2023-2024 is not available.	
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
		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.

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.11.3567/LHU/2023 dated 23 November 2023; conducted by KAN accredited laboratory (PT ITEC Solution Indonesia) located in Bogor, West Java; reference to PP RI No. 22/2021 (Lampiran VI)
- Clean Water certificate analysis Number: D.09.2923-1/LHU/2023 dated 9 October 2023, location in Buatan I POM, the reference of analysis report is based on PERMENKES No 2/2023. The result shown comply with the regulation.



		Air ambient certificate analysis Number: D.07.2178/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 VII). The result shown comply with the regulation.	
Criteria	<b>3.5:</b> 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.  - 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 HRit) to be made an agreement work (made 2 duplicate and should be sign by candidates in question.  2. PT Inti Indosawit Subur – Buatan I 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 I POM on behalf of prospective worker Fadli Hasyim in January 2024, several required documents are in accordance with the recruitment procedure, including:  - Candidate employee data form in the name of Fadli Hasyim	Complied



		<ul> <li>Copy of KTP/ID in the name of Fadli Hasyim</li> <li>Copy of Family Card in the name of Fadli Hasyim</li> <li>Basic physical and health examination by the Asian Agri Healthy Buatan Clinic on 2 April 2024</li> <li>Memorandum from Mill Manager Made in 1 POM no. 087/MI-PBS/MEMO/IV/2024 dated 3 April 2024 concerning the Acceptance and Appointment of Non-Staff Workers (PHL).</li> <li>The following verification is carried out related to worker promotions:         <ul> <li>Promotion of PHL (daily workers) workers to SKUH (permanent) in Buatan I Estate in the 2024 period (until March 2024) as many as 4 workers, while in the 2023 period there are 21 workers.</li> <li>Promotion of PHL (daily workers) workers to SKUH (permanent) in Buatan I POM in the 2024 period (until March 2024) as many</li> </ul> </li> </ul>	
3.5.2	Employment procedures are implemented and records are maintained.  - Minor compliance -	as 11 workers.  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.  2. PT Inti Indosawit Subur – Buatan I POM and Estate has issued the specific labour policy and procedures for temporary workers (PHL/PKWT);	Complied



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 I POM on behalf of prospective worker Fadli Hasyim in January 2024, several required documents are in accordance with the recruitment procedure, including:

- Candidate employee data form in the name of Fadli Hasyim
- Copy of KTP in the name of Fadli Hasyim
- Copy of Family Card in the name of Fadli Hasyim
- Basic physical and health examination by the Asian Agri Healthy Buatan Clinic on 2 April 2024
- Memorandum from Mill Manager Made in 1 POM no. 087/MI-PBS/MEMO/IV/2024 dated 3 April 2024 concerning the Acceptance and Appointment of Non-Staff Workers (PHL).

The following verification is carried out related to worker promotions: Promotion of PHL (daily workers) workers to SKUH (permanent) in Buatan I Estate in the 2024 period (until March 2024) as many as 4 workers, while in the 2023 period there are 21 workers.



	orandum issued by Head H	R Ops.		
Kebı	un Buatan I			
No.	Employe Name	Position	Memorandum	
	• •		Number	Date
1	Libertus Lai	Harvester	149/HR-RO2/MEMO/SK/06/2023	30-Jun-23
2	Saiful	Harvester	150/HR-RO2/MEMO/SK/06/2023	30-Jun-23
3	Eka Agus Susilo	Harvester	151/HR-RO2/MEMO/SK/06/2023	30-Jun-23
4	Dirkaman Laila	Harvester	152/HR-RO2/MEMO/SK/06/2023	30-Jun-23
5	Herip Rayudi	Harvester	153/HR-RO2/MEMO/SK/06/2023	30-Jun-23
6	Rafael Mahardika Nainggolan	Harvester	154/HR-RO2/MEMO/SK/06/2023	30-Jun-23
7	Juni Wandi Nainggolan	Nursery worker	059/HR-RO2/MEMO/SK/03/2023	31-Mar-23
8	Maretinus Hulu	FFB Loader	058/HR-RO2/MEMO/SK/03/2023	31-Mar-23
9	Hermanto Pandiangan	FFB Loader	057/HR-RO2/MEMO/SK/03/2023	31-Mar-23
10	Efendi P. Sibarani	Harvester	056/HR-RO2/MEMO/SK/03/2023	31-Mar-23
11	Pastikan Laila	Harvester	056/HR-RO2/MEMO/SK/03/2023	31-Mar-23
12	Pandi	Harvester	054/HR-RO2/MEMO/SK/03/2023	31-Mar-23
13	Yusurama Tofenao	Harvester	053/HR-RO2/MEMO/SK/03/2023	31-Mar-23
14	Onius Gea	Harvester	052/HR-RO2/MEMO/SK/03/2023	31-Mar-23
15	Hagianto Hasugian	Harvester	051/HR-RO2/MEMO/SK/03/2023	31-Mar-23
16	Yusup Matondang	Harvester	050/HR-RO2/MEMO/SK/03/2023	31-Mar-23
17	Viktor Odaligo Harefa	Harvester	049/HR-RO2/MEMO/SK/03/2023	31-Mar-23
18	Ibezaro Halawa	Harvester	048/HR-RO2/MEMO/SK/03/2023	31-Mar-23
19	Markus Nduru	Harvester	047/HR-RO2/MEMO/SK/03/2023	31-Mar-23
20	Mariski Anggiat Marito	Harvester	046/HR-RO2/MEMO/SK/03/2023	31-Mar-23
21	Ari Aji	Harvester	155/HR-RO2/MEMO/SK/06/2023	30-Jun-23
22	Sugiarto	Harvester	180/HR-RO2/MEMO/SK/03/2024	30-Mar-24
23	Odaligo Waruwu	Harvester	181/HR-RO2/MEMO/SK/03/2024	30-Mar-24
24	Dedy Herianto Halawa	Harvester	182/HR-RO2/MEMO/SK/03/2024	30-Mar-24
25	Jaya Kristinus Hulu	Harvester	183/HR-RO2/MEMO/SK/03/2024	30-Mar-24
26	Lindung Parningotan Sianturi	FFB Loader	184/HR-RO2/MEMO/SK/03/2024	30-Mar-24
27	Jonferi Sitorus	FFB Loader	185/HR-RO2/MEMO/SK/03/2024	30-Mar-24
28	Kiplen Simamora	Harvester	186/HR-RO2/MEMO/SK/03/2024	30-Mar-24

Promotion of PHL (daily workers) workers to SKUH (permanent) in Buatan I POM in the 2024 period (until March 2024) as many as 11 workers.



			norandum issued by Head tan I POM	i HR Ops.			
					Memorandum		
		No.	Employe Name	Position	Number	Date	
		1	Ilyas	Workshop	109/HR-RO2/MEMO/SK/01/2024	02-Jan-24	
		2	Bagas Pramuda	Process	110/HR-RO2/MEMO/SK/01/2024	02-Jan-24	
		3	Mulyana Yusuf	Process	111/HR-RO2/MEMO/SK/01/2024	02-Jan-24	
			Wahyu Wiranta	Dispatch Boy	112/HR-RO2/MEMO/SK/01/2024	02-Jan-24	
			Shamora Della Hoya	Process	113/HR-RO2/MEMO/SK/01/2024	02-Jan-24	
			Frialdi Yafet Lubis	Process	114/HR-RO2/MEMO/SK/01/2024	02-Jan-24	
			Haldy Fahreza	Process	115/HR-RO2/MEMO/SK/01/2024	02-Jan-24	
			Josua F.M.	Process	116/HR-RO2/MEMO/SK/01/2024	02-Jan-24	
			Muhammad Reza P.	Process	117/HR-RO2/MEMO/SK/01/2024	02-Jan-24	
			Mhd. Rio Andika P.	Process	118/HR-RO2/MEMO/SK/01/2024	02-Jan-24	
		11	Partogi Simanjuntak	Process	118/HR-RO2/MEMO/SK/01/2024	02-Jan-24	
		has		olished recrui	nents above, PT IIS-Buat itment procedures and ha		
3.6.1	<b>3.6:</b> An Occupational health and safety (H&S) plan is documented, effective <b>(C)</b> All operational activities risks assessed to identify the H&S issues.	Ť		•	the health and safety po	olicy under	Compl
3.6.1	Mitigation plans and procedures are documented and implemented.  - Critical (Major) compliance -	"Ke Gro ma con poli con Mill	bijakan Perusahaar pup, on 1 <sup>st</sup> Decemb intain occupational apliance with nation icy has not change amunicated to all e	n", signed b er 2019 Poi health and nal and inter s during this mployees an	y Managing Director of nt 3. Committed to implous safety management rnational applicable regular surveillance audit. The displayed at strategic left to employees including	Asian Agri ement and system in lation. The policy was ocations of	Сопри
		Res May acti	siko dan Penentuar y 2018 was estab vities both routine	. <i>Pengendali</i> lished and and non-rou	SOP "Identifikasi bahaya arl" "AA-SOP-HSE-03 RO implemented for Mill a utine activities. Hierarchy control. According to the	dated 20 nd Estates of control	



the OHS risk assessment and analysis must be reviewed once a year. Risk assessment in plantation were available.

Risk assessment method used is quantitative and qualitative 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 I 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 a 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. 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 I 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 — 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	
3.6.2	(C) The effectiveness of the H&S plan to address health and safety risks	awareness for harvester and smallholder member.  H&S Plan addressing health and safety risk of people are monitored as	Complied
	to people is monitored Critical (Major) compliance -	<ul> <li>below: <ul> <li>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.</li> <li>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.</li> </ul> </li> </ul>	
		- 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 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:

1. 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.
		<ol> <li>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.</li> </ol>
		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.
		6. Monitoring of emergency equipment (fire extinguisher, first aid hydrant) is carried out every month.
		7. 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.
Criteria	3.7: All staff, workers, Scheme Smallholders, outgrowers, and contract work	ers are appropriately trained.
3.7.1	<b>(C)</b> A documented programme that provides training is in place, which is accessible to all staff, workers, scheme smallholders, and outgrowers taking into account gender- specific needs, and which covers applicable aspects of P&C Principles, in a form they understand and includes	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.
	assessment of the training.  - Critical (Major) compliance -	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.

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		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	
		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.	

		<ol> <li>Pesticide sprayer training on 12 February 2024.</li> <li>Training of first aid officers on 29 january 2024.</li> <li>Plant Pest Disease Training on 14 February 2024</li> <li>Harvest and fertilization safety training on 15 February 2024</li> <li>Emergency response training/simulation on 29 May 2024</li> <li>The company has also made recording for all trainings that have been attended by employees in the recording of "Personal Data Training".</li> <li>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</li> </ol>	
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 -	time of training.  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 15 February 2024; 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	Based on document review and interview to the Mill Manager, it was known that Buatan I 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

	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.		
3.8.2	Mass Balance Module  A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.	PT. Inti Indosawit Subur – Buatan I POM holds current RSPO P&C Certificate No. RSPO 638918, first certification start on 16 September 2010 and current certificate is issued on 24/08/2021 and expired on 23/08/2026.  PT. Inti Indosawit Subur – Buatan I POM uses Mass Balance supply chain model. The mill only claimed the FFB proportion from certified supply bases which comprise of company-own estate (Buatan Estate) and 4 scheme Smallholder in form of cooperative/Koperasi Unit Desa (KUD). The proportion of non-certified FFB comes from third-party supplier (4 Supplier: CV Berkah Makmur Bersama, CV SAM PNR, CV Pardamaran JH and PT Kinabalu Perkasa). FFB Non certified approximately 80% from total FFB received by Buatan I POM.	Complied
3.8.3	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.	The estimated tonnage of certified CPO and PK that could potentially produced by PT. Inti Indosawit Subur – Buatan I POM its recorded in RSPO Public Summary report, certificate and RSPO IT Paltform.  The mill has met registration and reporting requirement as it registered in RSPO IT Platform (PalmTrace) with ID number RSPO_PO1000000021  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 (Aug 2023 – Jul 2024)  FFB: 102,791 MT	Complied

	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.	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 Buatan Estate and Smallholder, processing up to shipping of CPO and PK as well as daily production report. The procedure also regulates the	33
3.8.5	Documented procedures	PT. Inti Indosawit Subur – Buatan I POM can demonstrate procedures	Complied
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	Buatan Estate process at Buatan I POM.  PT. Inti Indosawit Subur – Buatan I 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 I POM has meet all registration and reporting requirements.  RSPO IT Platform/PalmTrace account RSPO_PO1000000021.	Complied
		CPO: 19,322 MT (OER: 18.80%) PK: 5,294 MT (KER: 5.15%) Actual production volume (July 2023 – June 2024) FFB: 42,248.58 MT CPO: 8,014.56 MT PK: 2,399.72 2 MT Actual sold volume (July 2023 – June 2024) CPO: 0 MT, All volume Sold as ISCC PK: 2,390.33MT  It was noted that all FFB certified form Buatan Estate was deliver to Buatan II POM. Since August 2023 – June 2024 there is no FFB from	



- 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.

- 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;
  - 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;

		<ul> <li>SOP AA-MPM-OP-1400.13-R1 Stasiun Pengelolaan Limbah for palm oil mill effluent treatment;</li> <li>SOP AA-MPM-OP-1400.14-R2 Stasiun Penimbunan dan Pengiriman CPO dan Kernel for CPO and PK bulking and despatch operation;</li> <li>SOP AA-MPM-OP-1400.15-R1 Perawatan for preventive maintenance;</li> <li>SOP AA-MPM-OP-1400.18-R4 Book Keeping</li> <li>SOP AA-MPM-OP-1400.17-R7 Traceability</li> <li>PT. Inti Indosawit Subur – Buatan I POM is able to demonstrate complete and up-to-date records and report demonstrating compliance with the supply chain's general requirement and modular requirement, including training records.</li> <li>As per Procedure of Traceability (AA-MPM-OP-1400.17-R7), the responsible person in charge to the supply chain system is Mill Manager. During audit, the mill manager is able to demonstrate sufficient knowledge and understanding on RSPO supply chain implementation for palm oil mill.</li> <li>PT IIS Buatan I POM has a procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill, as described in SOP AA-MPM-OP-1400.17-R7 Traceability, dated 1 October 2019. However Buatan I POM is implementing MB for supply chain model.</li> </ul>	
3.8.6	<ul> <li>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill;</li> <li>a) Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</li> </ul>	PT. Inti Indosawit Subur — Buatan I 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	Complied



- 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.

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.

Internal audit SCCS has been conducted on 18 – 23 March 2024 by Hendryk Simanjuntak (Lead Auditor). Internal audit report were evident, all issue raised during internal audit has been followed up by Corrective Action. According to internal audit result there is no issue regarding RSPO SCCS.

Management review conducted once a year as per SOP Internal Audit Nomor: AA-SOP-ES-6001-R5 dated 1 August 2020. Management review has been conducted on 25 March 2024. Input of management review consist of:

- Internal audit result
- Customer feedback
- 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.

Record of internal audit and management review are maintain and kept in the office by KTU.



#### 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 I POM has demonstrated SOP of Traceability (AA-MPM-OP-1400.7.R7), chapter 5.1 indicates the Weighbridge Clerk has responsibility to input data and print weighbridge card based on "Surat Pengantar TBS", covering information e.g. estate name and block number, mill name, date of delivery, product description and quantity, RSPO certificate number, transporter identity and unique identification number.

In the procedure also explain that the company shall inform the CB immediately if there is a projected overproduction of certified tonnage and shall have a mechanism in place for handling non-conforming FFB and/or documents.

PT. Inti Indosawit Subur – Buatan I POM receive FFB from certified and non-certified source. Certified source consist of own estate (Buatan Estate) and 4 scheme Smallholder in form of cooperative/Koperasi Unit Desa (KUD). The proportion of Non-certified FFB comes from third-party supplier (4 Supplier: CV Berkah Makmur Bersama, CV SAM PNR, CV Pardamaran JH and PT Jinabalu PErkasa).

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:

- FFB delivery "Surat Pengantar Buah (SPB) No.117-053" from KT-117 Balam, KUD Sejahtera dated 28/06/2024 total 200 bunches and 300 kg loosefruit. Weighbridge ticket "Tiket Timbangan No.PBSA224502206" dated 28/06/2024, for 200 FFB bunches; nett weight 5,064 kg; from KT-117 Balam, KUD Sejahtera; vehicle BM9498CK; RSPO certificate No.RSPO638918.
- FFB delivery "Surat Pengantar Buah (SPB) No.60-051" from KT-60 Usaha Mandiri, KUD Jaya Makmur dated 28/06/2024 – total 200 bunches and 550 kg loosefruit. Weighbridge ticket "Tiket Timbangan

Complied



No.PBSA224502203" dated 28/06/2024, for 200 FFB bunches; nett weight 5,462 kg; from KT-60 Usaha Mandiri, KUD Jaya Makmur; vehicle BM8156AH; RSPO certificate No.RSPO638918.

- FFB delivery "Surat Pengantar Buah (SPB) No.161-062" from KT-161 Sido Mukti III, KUD Bhakti Mandiri dated 28/06/2024 total 340 bunches and 400 kg loosefruit. Weighbridge ticket "Tiket Timbangan No.PBSA224502217" dated 28/06/2024, for 340 FFB bunches; nett weight 9,186 kg; from KT-161 Sido Mukti III, KUD Bhakti Mandiri; vehicle BM8139CJ; RSPO certificate No.RSPO638918.
- FFB delivery "Surat Pengantar Buah (SPB) No.067-061" from KT-67
  Tani Kamkmur V, KUD Sumber Rejeki dated 28/06/2024 total 400
  bunches and 400 kg loosefruit. Weighbridge ticket "Tiket Timbangan
  No.PBSA224502314" dated 28/06/2024, for 400 FFB bunches; nett
  weight 8,054 kg; from KT-67 Tani Makmur V, KUD Sumber Rejeki;
  vehicle BM9005LS; RSPO certificate No.RSPO638918.

#### Non-certified FFB:

- FFB delivery note: "Surat Pengantar TBS", No. 24-031754 dated 16/07/2024 From CV Pardamaran JH, vehicle code BM9356MH; driver Misdi; Weighbridge ticket "Tiket Timbangan No.PBSA524609002" dated 16/07/2024, for 458 FFB bunches; nett weight 7,111 kg; FFB source from non-certified third party FFB supplier CV Pardamaran JH, ID A351; vehicle BM9356MH, Driver Misdi.
- FFB delivery note: "Surat Pengantar TBS", No. 24-14899 dated 16/07/2024 From CV – SAM, PNR, vehicle code BM9072YU; driver Iwan; Weighbridge ticket "Tiket Timbangan No.PBSA524609023" dated 16/07/2024, for 458 FFB bunches; nett weight 7,920 kg; FFB source from non-certified third party FFB supplier CV-SAM, PNR, ID A199; vehicle BM9072YU, Driver Iwan.
- FFB delivery note: "Surat Pengantar TBS", No. 1102 dated



		<ul> <li>16/07/2024 From PT Kinabalu Perkasa, vehicle code BM8669CM; driver Sutrisno; Weighbridge ticket "Tiket Timbangan No.PBSA524609018" dated 16/07/2024, for 378 FFB bunches; nett weight 6,674 kg; FFB source from non-certified third party FFB supplier PT Kinabalu Perkasa, ID A380; vehicle BM8669CM, Driver Sutrisno.</li> <li>FFB delivery note: "Surat Pengantar TBS", No. 01738 dated 02/07/2024 From Berkah Makmur Bersama, vehicle code BM9926SC; driver Andi S; Weighbridge ticket "Tiket Timbangan No.PBSA524608165" dated 02/07/2024, for 337 FFB bunches; nett weight 5,888 kg; FFB source from non-certified third party FFB supplier Berkah Makmur Bersama, ID A0394; vehicle BM9926SC, Driver Andi S.</li> </ul>	
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;	<ul> <li>During 2023 - 2024 there is no CPO sold as RSPO certified. All certified CPO sold as ISCC certified. PK certified RSPO was deliver to own Kernel Crushing Plant namely Buatan I Kernel Crushing Plant – PT Inti Indosawit Subur. The PK certified delivery was completed with Delivery Form.</li> <li>Sample seen of delivery form CSPK from Buatan I POM to Buatan I KCP:         <ul> <li>Delivery Form No. KCP PBS 1004 SS dated 30 Apr 2024, From PT IIS – Buatan I POM to PT IIS – KCP Buatan I, Commodity: RSPO Certified Palm Kernel, Supply Chain model: Mass Balance, certificate number: RSPO 638918, quantity 248,650 kg, transport by Fan/Pipe.</li> </ul> </li> <li>Delivery Form No. KCP PBS 1005 SS dated 31 May 2023, From PT IIS – Buatan I POM to PT IIS – KCP Buatan I, Commodity: RSPO Certified Palm Kernel, Supply Chain model: Mass Balance, certificate number: RSPO 638918, quantity 168,610 kg, transport by Fan/Pipe.</li> <li>Delivery Form No. KCP PBS 1006 SS dated 30 Jun 2024, From PT IIS – Buatan I POM to PT IIS – KCP Buatan I, Commodity: RSPO Certified Palm Kernel, Supply Chain model: Mass Balance, certificate number:</li> </ul>	Complied



	h) Any related transport documentation;	RSPO 638918, quantity 222,340 kg, transport by Fan/Pipe.	
	i) A unique identification number.	The information contain in the document are complete and can be presented either on a single document or across a range of documents.	
3.8.9	Outsourcing Activities  ii) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification.  iii) The mill shall ensure the following:  a) The mill has legal ownership of all input material to be included in outsourced processes  b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.  c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.  d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.	PT. Inti Indosawit Subur – Buatan I 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 I POM having legal ownership of material being transported by appointed outsourced companies: CV Jasa Sahabat Abadi, CV Buana Jaya Bersama & CV Jasa Bersama.  PT. Inti Indosawit Subur – Buatan I POM have a contract agreement with transporter as below:  - "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.  - "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.  - "Perjanjian Pengangkutan Nomor: 03/VI/JSA-IIS/2020" dated 4 June 2020 between PT Inti Indosawit Subur – Buatan I POM and CV Jasa Bersama. Contract transport for CPO & PK.  - "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.  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 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	Complied



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 I 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.

However since latest audit (July 2023 - June 2023) there is no CPO certified RSPO delivery by Buatan I POM. CPO delivery as ISCC certified. During onsite audit confirmed that control for CPO and PK delivery has well implemented by Buatan I Palm Oil Mill. Interview with CPO and PK transporter from CV Jasa Sahabat Abadi indicated that they have aware and controlled by PT Inti Indosawit Subur – Buatan I POM.

Interview with transporter PT Buana Jaya Bersama conducted on 24 July 2024, 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 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 I 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	<ul> <li>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.</li> <li>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.</li> <li>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.</li> <li>iv) For Mass Balance Module, the mill:</li> </ul>	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	Complied



	<ul> <li>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.</li> <li>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.</li> <li>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).</li> </ul>	<ul> <li>Mass balance report period 2023/2024: January – March 2023, April – June 2023, July – September 2023, October – December 2023, January – March 2024, April – June 2024.</li> <li>Internal audit RSPO SCCS and Management review</li> <li>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.</li> <li>Buatan I 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.</li> <li>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.</li> <li>According to Mass balance Report, Buatan I POM only deliver Mass Balance sales from a positive stock.</li> </ul>	
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 2022/2023 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 I POM.	Complied



		OER and KER are esti experience (previous		ciated inputs and upon past (production).	
		The site has set OER	for budget 2024 as 18	3.42% and KER as 5.60%.	
		Budget FFB process 2	024: certified 25,983.	43 MT	
		Budget CPO production	on 2024: certified 4,80	)3.87 MT	
		Budget PK production	2024: certified 1,455	.07 MT	
		Previous Budget vs 2023/2024 (July 2023		ied FFB, CPO and PK on ow:	
		Description	Budget	Realization	
		FFB Certified	57,311.39	42,263.99	
		FFB Non Certified	212,708.90	140,507.35	
		CPO Certified	10,599.54	7,555.69	
		CPO Non Certified	39,138.44	25,096.28	
		PK Certified	3,178.11	2,284.70	
		PK Non Certified	11,978.34	7,447.54	
		OER (Certified)	18.49	17.88	
		KER (certified)	5.44	5.30	
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	OER and KER are update performance.	ated periodically to en	sure accuracy against actual	Complied
		Based on daily report ytd 30 June 2024 are		actual OER and KER average	
		- OER = 18.03%			
		- KER = 5.60%			



		Average OER 5.30%.	since July 202	3 – June 2	2023 was :	17.88 % a	nd KER was	
3.8.15	Processing For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil	Buatan I POM This indicator	implement Ma is not applicab		e Module.			Not Applicable
	palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.							
3.8.16	i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.	PT. Inti Indo announcemen July 2023 – Ju	t inside PalmT					Complied
		Transaction ID	Buyer	Product	Supply Chain Model	Volume	Status	
		TR-2d38c5de- 6ad5	Buatan I KCP	CSPK	MB	411.51	Confirmed	
	removed in the RSPO IT platform.	TR-52c6bd82- 8fd8	Buatan I KCP	CSPK	МВ	413.59	Confirmed	
		TR-1fc5b418- 98b3	Buatan I KCP	CSPK	МВ	1,742.82	Confirmed	
		PT. Inti Indos certified CSPC 8,603.5 MT CS evidence of re transaction wi 17/07/2024.	) from their F SPO; Stock rem move transact	PalmTrace noved for ion can be	account CSPO sold demonstr	with volur as ISCC cated on the	me remove: ertified. The ne palmtrace	
3.8.17	Claims	1400.17-R7) d	e for claims is s ated 1 October duct in com	2019. Th	e mill only	makes clai	ms on RSPO	Complied

	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.	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 I POM has not made claims regarding the support of RSPO certified oil palm products. However the organization aware about the RSPO Rules on Market Communications and Claims	
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 Tungkal Ulu POM is highlighting its commitment to the principles of RSPO, and directly referring to RSPO website. The corporate communication can be found at <a href="http://www.asianagri.com">http://www.asianagri.com</a> .	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	<ul> <li>Display its RSPO membership status: On the website of Asian Agri, it was stated the company is RSPO Member since February 2006.</li> <li>Display the RSPO web address: Not in direct manner. In Asian Agri website, company made a link to RSPO website.</li> <li>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 production. We received our 1st RSPO certification for our estate in 2010, and in 2012, the certification for our smallholder scheme."</li> <li>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.</li> </ul>	Complied

		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.	
4.3	Members are <b>not allowed</b> to use the RSPO corporate logo as shown below. This is for the sole use of the RSPO Secretariat.	Asian Agri website did not display the RSPO Corporate Logo.	Complied
4.4	In corporate communications, RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO certified palm oil products.	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 (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
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:	PT Inti Indosawit Subur – Buatan I POM is a certified member as a subsidiary of RSPO registered member PT Inti Indosawit Subur. The corporate communication of PT Inti Indosawit Subur can be seen in the company website, under brand Asian Agri at the address <a href="https://www.asianagri.com">www.asianagri.com</a> . Asian Agri website display RSPO Trademarks with	Not Applicable

	<ul> <li>i. "The rate of RSPO-certified palm oil procurement was (X%). We aim to achieve (X%) sustainable procurement by fiscal year (YEAR)." <ul> <li>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.</li> <li>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".</li> </ul> </li> </ul>	valid trademark licence number 1-0022-06-100-00. Therefore, this is not applicable.	
Product-	-specific communications		
5.1 Gene	eral		
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 I 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 I POM stated the supply chain model and certificate number, e.g. in sales contract, DO and weighbridge ticket/delivery note.	Complied
5.1.3	Wherever the RSPO Label is displayed for product-specific communications, the applicable trademark licence number must be shown immediately under or next to the RSPO Label or the statement itself.	PT Inti Indosawit Subur – Buatan I 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 I 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.  Organisations that do not further modify end products or that do not need to undergo Supply Chain Certification such as retailers, traders, or distributors who intend to use the RSPO Label with their own RSPO Trademark licence number in any of their product-specific communications, can do so by undergoing a remote audit. A remote audit shall be conducted by an RSPO-accredited certification body (CB) prior to the use of the RSPO Label whereby the organisation will need to demonstrate that the use is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain	PT Inti Indosawit Subur – Buatan I POM is a palm oil mill; thus, this indicator is not applicable.  PT Inti Indosawit Subur – Buatan I POM is a palm oil mill; thus, this indicator is not applicable.	Not Applicable Not Applicable
5.2 Off	pack claims		
5.2.1	Off pack claims are product-specific communications regarding the	PT Inti Indosawit Subur – Buatan I POM did not use RSPO trademark or	Complied
	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	logo in the product specific communication.  PT Inti Indosawit Subur – Buatan I POM Product-specific communications made under sales contract, DO and weighbridge	



	should be used together with the valid trademark licence number wherever an off pack claim is made.	ticket/delivery note. Stated in sales documents that the product they sold is RSPO Certified model IP.  PT Inti Indosawit Subur – Buatan I POM stated the supply chain model and certificate number, e.g. in sales contract, DO and weighbridge ticket/delivery note.	
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 I 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.		Not Applicable
5.3 On	pack claims		
5.3.1	Only RSPO members who have supply chain certification and members who have undergone remote audit as per 5.1.6 are allowed to make on pack claims about the certified sustainable palm oil contained within the product(s) as per Module A, B, C and E. RSPO members who have purchased RSPO Credits are entitled to claim their support for the production of certified sustainable palm oil as per Module D.	PT Inti Indosawit Subur – Buatan I 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 I 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:		
	<ul> <li>RSPO IP/SG CERTIFIED*</li> <li>Contains RSPO IP/SG palm oil*</li> <li>Contains RSPO certified palm oil (IP/SG)*</li> <li>*Add RSPO TM Licence Number below or next to the claim.</li> </ul>		
	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 I 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 I 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.		
	<ul> <li>D) For Products covered with Book and Claim (B&amp;C):</li> <li>RSPO CREDITS*</li> <li>Supports the production of RSPO certified palm oil*</li> <li>Contains palm oil covered by the purchase of RSPO Credits*</li> <li>*Add RSPO TM Licence Number below or next to the claim.</li> </ul>	PT Inti Indosawit Subur – Buatan I POM sold its oil palm product in bulk, there was no on-pack claim used.	Complied
5.3.3	On pack claims shall not include information about the claimant's RSPO membership status.	PT Inti Indosawit Subur – Tungkal Ulu 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 I 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 I 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 I POM sold its oil palm product in bulk, up to this moment, PT Inti Indosawit Subur has not use RSPO label or trademark.	Complied
Product	t-Specific Communications Labelling		
	Members are allowed to use the RSPO Label in one of the following ways:  • RSPO Trademark that includes the tag "CERTIFIED"; or  • RSPO Trademark that includes the tag "This product contains 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
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 I POM is producing and selling CPO and PK; All certified product sold are 100 % content oil palm RSPO MB-certified.	Complied
		No such cases as the certified material is bulk intermediate product.	
		By default, the material is either 100% claimed under RSPO or not RSPO.	
	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	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 I POM was not produce end consumer goods. The production are CPO and PK.	Complied

	palm oil content shall be covered by the purchase of RSPO Credits of		
	equivalent volume.		
Messag	ging		
	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.	PT Inti Indosawit Subur – Buatan I POM was not use storytelling in product-related communications.	Complied
	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.		
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
Princip	le 4: Respect community and human rights and deliver benefit		
Respect	community rights, provide equal opportunities, maximise benefits from engage	gement and ensure remediation where needed.	
Criteria	4.1: The unit of certification respects human rights, which includes respectir	ng the rights of Human Rights Defenders.	
4.1.1	<b>(C)</b> A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, supply chain and	There are no changes related to the corporate policy that has been set on 1 December 2019 which has been ratified by the Managing Director (Kevin Tio). The policy relating to human rights, is explained in point 13,	Complied



local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.

- Critical (Major) compliance -

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".

Separately, the company has also a policy related a Human Rights Defender (HRD), which is stated in the Internal Memorandum No. 049/HO/MEMO/INT/03/20 from Head Operational on 20 March 2020: "Protection against the reporters/defenders of human rights defender from acts of revenge, intimidation and harassment".

Corporate policy has been socialized/delivered to all levels of PT IIS – Buatan Group employees and on stakeholders (including local contractors) on 8 January 2024 (list of participants can be shown during audit). Based on interviews with several workers at field visits, in general workers understand the company policy related the human right.

#### **Scheme Smallholder:**

Plasma Buatan I Plantation in each KUD or Cooperative has had organisation policy, for example: In KUD Bhakti Mandiri was established on 20 February 2022, in KUD Jaya Makmur was set on 22 February 2022, in KUD Sumber Rezeki was set on 27 February 2022 and in KUD Sejahtera was set on 18 February 2022. The policy is contained as following:

- 1) Compliance with regulation and law
- 2) 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	
		Respect defenders without giving threats or intimidation	
		<ol> <li>Respect human rights defenders without making threats or intimidation Prevent sexual harassment</li> </ol>	
		8) 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 policy has been socialized by the KUD/Cooperative each to all members, partners and surrounding communities, such as:	
		<ul> <li>KUD Bhakti Mandiri has been socialized to all smallholders on 20 December 2023.</li> </ul>	
		- KUD Jaya Makmur to all smallholders on 08 August 2023	
		<ul> <li>KUD Sumber Rejeki has been socialized to all smallholders on 11 June 2024</li> </ul>	
		<ul> <li>KUD Sejahtera has been socialized to all smallholders on 25 January 2024</li> </ul>	
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 -	Based on the interview with stakeholder and documents review with the head of the Head of Bukit Harapan Village, Chief of Gender committee that PT IIS - Buatan Group, there is no any use of employees from mercenaries and paramilitaries use in the operations.	Complied
	, more sompressed	Up to this Surveillance audit, there is no issue or case related to the acts of violence against the employees of the company.	
Criteria	4.2: There is a mutually agreed and documented system for dealing with co	mplaints and grievances, which is implemented and accepted by all affected	ed parties.
4.2.1	<b>(C)</b> The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring	Buatan Estate and Mill	Complied



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 -

Company has established a mechanism to handle complaint from external party, as written in "Mekanisme Penanganan Keluhan" – complaint handling mechanism (Doc. No. SOP AA-GL-5005-RO-01) while complaint from internal regulated under "Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan" – Employee' complaint and resolution mechanism (Doc. No. SOP-AA-HR-3008-RO 05) and responded not more than 14 days.

In point 4.2.2 of procedure stated that the anonimity of complainant will be confidential. 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 in "Mekanisme Komunikasi, Konsultasi dan Keluhan", dated 3rd January 2011. The procedure has been communicated to all members on 14 February 2021 and also recorded into the "Buku Pintar" for each of farmer. Meanwhile, each KUD has determined the personality who is in charge/responsible related to communication and communication, based on the Management Decree, as follows:

1. Decree/SK No. 6 Kpts/KUD-BM/II/2018 dated 10 February 2018 concerning the appointment of communication and consultation officers at KUD Bhakti Mandiri to Bpk. Sugeng.



		<ol> <li>Decree/SK No. 6 Kpts/KUD-JM/I/2021 dated 09 January 2021 concerning the appointment of communication and consultation officers at KUD Jaya Makmur to Bpk. Wilis.</li> <li>Decree/SK No. 4 Kpts/II/2018 dated 15 February 2018 concerning the appointment of communication and consultation officers at KUD Sejahtera to Bpk. Agusmiran.</li> <li>Decree/SK No. 2/Kpts/KUD-SR/I/2020dated 11 January 2020 concerning the appointment of communication and consultation officers at KUD Sumber Rezeki to Bpk. Sumarlan.</li> <li>This policy has been socialized by the KUD/Cooperative each to all members, partners and surrounding communities, such as:         <ul> <li>KUD Bhakti Mandiri has been socialized to all smallholders on 20 December 2023.</li> <li>KUD Jaya Makmur to all smallholders on 08 August 2023</li> <li>KUD Sumber Rejeki has been socialized to all smallholders on 11 June 2024</li> <li>KUD Sejahtera has been socialized to all smallholders on 25 January 2024</li> </ul> </li> </ol>	
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.  - Minor compliance -	Unit of Certification has established a mechanism to handle complaint from external party, as written in "Mekanisme Penanganan Keluhan" – complaint handling mechanism (Doc. No.SOP AA-GL- 5005-RO 01) while complaint from internal regulated under "Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan" – Employee' complaint and resolution mechanism (Doc. No.SOP-AA-HR-3008-RO 05). The procedure is how to handling complaint and grievances, the company keeps confidential complainer and whistleblower. Complaint and grievances is recorded in log Book and in "Formulir Pencatatan Keluh	Complied

		Kesah dan Ketidakpuasan". The company will endeavor to resolve complaints within 14 working days.  These mechanisms has been communicated to external parties at the time conducting of communication and consultation with stakeholder, contractor and local communities on April 2024. While for the internal parties (all level employees at PT Inti Indosawit Subur – Buatan Group has been communicated on 9 February 2024 (list of participants can be shown during audit). Through this communication, the company explained about the mechanism of submission of complaints in detail and lasts in two directions (ask-answer/discussion), so if there are illiterate parties can understand.  According to interview with management representatives and sustainability staff and also several of employees during the audit, there is no illiterate parties in estate, mill or scheme smallholders.	
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 -	Buatan Estate and Mill  Company has established a mechanism to handle complaint from external party, as written in "Mekanisme Penanganan Keluhan" – complaint handling mechanism (Doc. No. SOP AA-GL-5005-RO-01 dated 22 August 2011) while complaint from internal regulated under "Mekanisme Penyampaian Keluhan dan Penyelesaian Keluhan Karyawan" – Employee' complaint and resolution mechanism (Doc. No. SOP-AA-HR-3008-RO 05) and responded not more 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 <a href="https://www.asianagri.com/id/panel-keberlanjutan/keluhan-pengaduan">https://www.asianagri.com/id/panel-keberlanjutan/keluhan-pengaduan</a> .	Complied

grie to re reso stak	an Agri is committed to responding quickly and constructively to any evance raised against any of our own operations or our suppliers, and report them publicly. We develop a robust grievance procedure to olve all verifiable complaints and conflicts with all related keholders such as land conflicts, social conflicts, human right issues, or issues, etc.		
	Internal Reporting:	Channel/Remarks	
	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.	• Disruption • Complaint	
3	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@asia     nagri.com
External Reporting:	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.	<ul> <li>agri.com</li> <li>Address:         Jl. MH Thamrin No. 31         Jakarta 10230         Indonesia</li> <li>Fax: +62 21 230 1120         Attn.: Grievance         Secretariat</li> <li>Grievance submissions         should be made using         the Grievance Submission         Form.</li> </ul>
This procedure is also applied to sche The procedure provides guidelines o sustainability practices across our s	n handling grievances related to



matters in our operations. The following grievance channels are available to support business transparency:

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).

- 1. Based on document review of complaint logbook, there are several cases such as :There was a complaint on 9 July 2024 from Farm's Law Firm conveyed by letter that a client by the name of Ani owns land with SHM legality adjoining the company's HGU area and the company has made an elephant trench / boundary trench through Mrs. Ani's land. The company responded on 13 July 2024 stating that the construction of the elephant trench/ boundary trenchwas within the company's HGU area and did not enter the location of Mrs. Ani's area. Furthermore, Farm's Law Firm through WA communication media said that they would take legal action to resolve the issue, and the company agreed. Until this Audit took place there has been no follow-up from Farm's Law Firm.
- 2. 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 "*Mekanisme Komunikasi, Konsultasi dan Keluhan*", dated 3rd January 2011. The procedure has been communicated to all

		members on November 2019 and also recorded into the "Buku Pintar" for each of farmer.  During this surveillance audit, according the interview with several farmers on the ground, that there is no any grievance from farmers member.	
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 -	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, "Mekanisme Penanganan Keluhan" – 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 (Humas: Hubungan Masyarakat) 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 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.	Complied



		Based on the complaint verification above indicator 4.2.3, the companies have handled complaints according to established procedures.  Based on the verification of the above documents and interviews with the parties (stakeholders) that the complaint handling resolution has been handled properly. In the complaint mentioned above, mediation has not yet been reached involving another party (third party) as arbitrator.
Criteria 4	1.3: 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 -	PT Inti Indosawit Subur-Buatan Group has set a CSR program for the 2023-2024 period, the determination of this CSR program is determined based on consultation/deliberation with the surrounding village community (village head) through the Village Planning and Development Deliberation (Musrenbang Desa) for the 2024 period.  Musrembang – The 2024 Development Planning Deliberation was held on February 29, 2024 in Pelalawan Sub District (for village planning for the 2024 period) in surrounding villages. Musrenbang is a forum for deliberation between villagers which is held to discuss village problems and potentials so that they are properly identified to provide clear direction for appropriate actions according to the priority scale Fulfilled and implemented in overcoming problems or maximizing existing potential. the basis for the village government's work program to implement annual village budgeting and activities.
		BUDGET RECAP AND REALIZATION DECEMBER 2023
		CPC Budget Realization Remains % Estate Aspect IDR IDR IDR
		Sosial   8,000,000   11,758,750   - 3,758,750   147%
		Infrastruktur         20,000,000         15,000,000         5,000,000         75%           Lingkungan         20,000,000         20,000,000         -         100%           Sub         287,165,000         259,383,850         27,781,150         90%

...making excellence a habit."

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

Realisasi CSR tahun 2023: sebesar 90% CSR Program for 2024 period as follows: 5. Social, including: - Blood donors - Flood relief - Cheap market 6. Livestock, including: - Alternative economic program 7. Plantation, including: - Plasma farmer development - Independent farmer development 8. 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

		<ul> <li>Assistance in the health sector, namely a coordination meeting with the Pelalawan Regency TPPS for stunting prevention</li> <li>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>.</li> <li>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.</li> </ul>	
Criteria	4.4: Use of the land for oil palm does not diminish the legal, customary or u	ser rights of other users without their free, prior and informed consent.	
4.4.1	(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed (FPIC) process. Documents related to the history of land tenure and the actual legal or customary use of the land are available.  - Critical (Major) compliance -	<ul> <li>PT. Inti Indosawit Subur – Buatan Estate and POM has obtained the legal ownership in the form of HGU, as follow:</li> <li>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 13<sup>th</sup> May 1993.</li> <li>2. HGU (Land titles) No.01, 1993, dated 19<sup>th</sup> June 1993. for Buatan Estate (5,781 Ha). HGU valid until 31 December 2023.</li> <li>3. PT IIS Buatan Estate has propose the renewal HGU with process as below:</li> <li>Application letter PT IIS Buatan Estate "Permohonan Perpanjangan/Pembaharuan HGU Nomor: 009/GL-AAS/EXT/10/23 dated 27 October 2023".</li> <li>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</li> </ul>	Complied



- 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 – 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 – 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<sup>th</sup> 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:**

Scheme Smallholder of PT Inti Indosawit Subur – Buatan Estate has planted since 1988 - 1993. Currently, replanting activities are still in progress. Replanting has been started since 2018 – 2024 and still continue in progress.

Land ownership status of Scheme Smallholder is granted by government program namely Transmigration Program since 1992 - 1995 (PIR - TRANS). All area of scheme smallholder has land title in the form of SHM (Sertifikat Hak Milik - Land ownership Certificate)

Sample of land title of Smallholder samples has been verified during audit, among others:

Name	KUD	SHM No.	Area (ha)
Anton Winyoto (Subarmin)	Sumber Rezeki	142	2
Arpen Simbolon (Toha B. Gojali)	Sumber Rezeki	289	2
Dewita Sari (Sukiman)	Sumber Rezeki	304	2
Kusmiati (Zainuddin)	Sumber Rezeki	305	2
Minarsih (Suwanda)	Sumber Rezeki	446	2
R. Suprapno	Sumber Rezeki	326	2
Jumari	Sejahtera	1140	2
Lestari	Sejahtera	1153	2
Yanto	Sejahtera	05036	2
Muclis Ali	Sejahtera	05063	2
Nadirin (Khaidir)	Sejahtera	2352	2
Subandi	Jaya Makmur	698	2
Suparman	Jaya Makmur	077	2



Yadi	Jaya Makmur	599	2
Suhadi	Jaya Makmur	595	2
Wagino (Dwi)	Bhakti Mandiri	365	2
Suroso (Iqbal)	Bhakti Mandiri	292	2
Wasbun (Malikul)	Bhakti Mandiri	932	2
Miftahul (Tjuk Sugimin)	Bhakti Mandiri	370	2

Cooperative of scheme smallholder has also legal permit document as below:

KUD	Туре	Document No.
Sumber Rezeki	Surat Izin Tempat Usaha	523.33/SITU/II/2019/06
	Nomor Induk Berusaha	NIB: 2804220016643
Sejahtera	Surat izin Tempat Usaha	137/BPMP2T/SITU/2018/267
	Nomor Induk Berusaha	NIB: 2905240055711
Jaya Makmur	Surat Izin Tempat Usaha	523.33/SITU/VII/2019/016
	Nomor Induk Berusaha	NIB: 1107240087701
Bhakti Mandiri	Surat Izin Tempat Usaha	523.33/2018/13
	Nomor Induk Berusaha	NIB: 0307240087607

Based on interview, KUD Sumber Rezeki and KUD Jaya Makmur, sampled smallholder member (farmer) and relevant authority, Plantation Agency of Pelalawan 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  $1^{\rm st}$  August 2014. The mechanism explaining



		flow process to resolution on land conflict, with involvement of company, village government and all related agencies.	
4.4.2	Copies documents evidencing agreement- making processes and negotiated agreements detailing the FPIC process are available and include:  - 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 taken to involve them in decision making.	There is no land acquisition since Buatan Estate and POM established. PT Inti Indosawit Subur – 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 – 2024. It was noted 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.  The unit of certification has been running its operational business since 1980's. Previously the rights owned were in the form of HGU on 1993 so currently, there is no new land compensation process. As information obtained from interviews with representatives of Bukit Agung Village and smallholder sampled member, it is known that so far there have been no issues regarding land conflicts.	Complied
		Until the surveillance assessment ASA2.3 is carried out, there is no additional or expansion operational area.	
	4.4.2b Evidence that the unit of certification has respected communities to give or withhold their consent to the operations at the time that these decisions were taken;	Based on documents review and interview with local government and local communities surrounding the company, 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 smallholder plantation. In addition, there is no land dispute between the company and communities surrounding their operational areas.	



	4.4.2c Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities. Including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land.	Based on documents review and interview with local government and local communities surrounding the company, 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 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 -	Buatan Estate and Scheme Smallholders:  The Company and scheme smallholders have "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.  Based on the document review, interviews with community representatives from Bukit Harapan 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 have the option of accessing resources for independent third party advice through a documented, long-term and two-way process of consultation and negotiation.	Complied



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 -	Buatan Estate and Scheme Smallholder:  Based on documents review and interview with local government and local communities surrounding the company, it was noted that no customary land or other legal rights within the company areas and in smallholder plantation.	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 -	Buatan Estate and Scheme Smallholder:  Based on the document review, interviews with community representatives from Bukit Harapan 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). 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 have the option of accessing resources for independent third party advice through a documented, long-term and two-way process of consultation and negotiation.	Complied
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 Bukit Harapan 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). The history of land	Complied



		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 have the option of accessing resources for independent third party advice through a documented, long-term and two-way process of consultation and negotiation.	
	<b>4.5:</b> 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 – 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 dan Pasir Penyu, Kabupaten Indragiri Hulu, Provinsi Riau" dated 29 <sup>th</sup> 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 – Buatan 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 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 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.	
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 – Buatan 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 – Buatan 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 <sup>th</sup> 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).	Complied

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 – Buatan 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 – Buatan 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 participation and participatory land use planning with local communities,	Complied



		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 – Buatan 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 – Buatan 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 the national interest (eminent domain) without FPIC process, except in	Based on document verification, management unit has no land expansion or new planting after November 2018.	Complied



	cases of smallholders benefitting from agrarian reform or anti-drug programmes.  - Minor compliance -	PT. Inti Indosawit Subur – Buatan 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 <sup>th</sup> 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
	<b>4.6:</b> Any negotiations concerning compensation for loss of legal, customal local communities and other stakeholders to express their views through the		oles indigenous
4.6.1	(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.  - 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

		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	<b>(C)</b> A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and	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.	Complied
	corrective actions taken as a result of this evaluation Critical (Major) compliance -	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, 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.	
4.6.3	Evidence is available that equal opportunities are provided to both men and women to hold land titles for smallholdings (if possible based on local	Until the surveillance audit 2.3 was carried out, there is currently no new land compensation.	Complied
	law, customs and/or agreement) Minor compliance -	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.	
		The compensation documentation process was completed before 1991, this is in line with the explanation from 12 KUD Bhakti Mandiri farmers and 12 KUD Sejahtera farmers. Where the plasma that is formed is part of the government program contained in the document "Keputusan menteri Transmigrasi No.Kep.90/MEN/1990 tentang Izin Pelaksanaan Transmigrasi PIR-Trans kepad PT. Inti Indosawit Subur I dengan	

		Komoditas Kelapa Sawit di Lokasi Pangkalan Kuras, Kabupaten Kampar dan Pasir Penyu, Kabupaten Indragiri Hulu, Provinsi Riau" dated 29th July 1991.  In addition to evidence that there are equal opportunities for women's representation, there are several names of female farmers in plasma holdings established by companies.	
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 Bhakti Mandiri farmers and KUD Sejahtera farmers. Where the plasma that is formed is part of the government program contained in the document "Keputusan menteri Transmigrasi No.Kep.90/MEN/1990 tentang Izin Pelaksanaan Transmigrasi PIR-Trans kepad PT. Inti Indosawit Subur I dengan Komoditas Kelapa Sawit di Lokasi Pangkalan Kuras, Kabupaten Kampar dan Pasir Penyu, Kabupaten Indragiri Hulu, Provinsi Riau" dated 29th July 1991.	Complied
	<b>4.7:</b> 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 i	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.  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. No plantation expansion since existed in 1988. 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.  If there is a land dispute as described in indicator 4.2.1, the company	
		will use the procedure as stipulated in the Standard Operating Procedure (SOP) document no. AA-GL-5003.1-R2 regarding Land Conflict Management which was approved by management on 08 May 2015.	
4.7.2	<b>(C)</b> A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.	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.	
		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. No plantation expansion since existed in 1988. 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.	
		If there is a land dispute as described in indicator 4.2.1, the company will use the procedure as stipulated in the Standard Operating Procedure (SOP) document no. AA-GL-5003.1-R2 regarding Land Conflict Management which was approved by management on 08 May 2015.	



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.	Complied
		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. No plantation expansion since existed in 1988. 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.  If there is a land dispute as described in indicator 4.2.1, the company will use the procedure as stipulated in the Standard Operating Procedure	
		(SOP) document no. AA-GL-5003.1-R2 regarding Land Conflict Management which was approved by management on 08 May 2015.	
Criteria	4.8: The right to use the land is demonstrated and is not legitimately contes	ted by local people who can demonstrated that they have legal customary,	or user rights.
4.8.1	Where there are or have been disputes, proof of legal acquisition of title	There is no land conflict present in area of PT IIS – Buatan Estate.	Complied
	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 -	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.	
		PT. Inti Indosawit Subur – Buatan 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 <sup>th</sup> 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).	
4.8.2	(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 land conflict present in area of PT IIS – Buatan Estate.  During this audit ASA2.3 it was noted that there was letter of somation and clarification of the case receive by PT IIS – Buatan Estate dated 9 July 2024, letter number 17/SOM/FAM'S/VII/2024 from Fam's law Firm. The somation is stated that PT IIS through CV Shinta as a subcontractor has entered into a land lease agreement for the land area on behalf of Zamhur (Ani) with area 100 x 200 m since 1989, however the company only made payments for a period of one year and no longer received payments after that. Fam's law Firm as Zamhur's/Ani attorney requested compensation from the company for this matter.  Company has respond the somation thrugh letter number 120/EXT/GL-RO2/VII/24 dated 19 July 2024. PT IIS stated that company in carrying out business activities has fulfilled the provisions of applicable laws and regulations so that the request from Ani could not be fulfilled & until now there is no legal matter between company and Ani.  Auditor team has verify the location of land dispute and the land object is actually the land object is land with a certificate of ownership status in the name of Sardi, SHM No. 347 dated 23/9/1994. The land was ex scheme smallholder which is bought by RAPP and manage by company PT IIS – Buatan Estate. The land object is not on behalf Ani/Zamhur.  After respond letter submit by PT IIS – Buatan Estate to Fam's law Firm,	Complied
		there is no response yet from Fam's law Firm	
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use	There is no new land acquisition or new expansion by PT IIS – Buatan Estate.	Complied



_	e 5: Support smallholder inclusion smallholders in RSPO supply chains and improve their livelihoods through fair	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 (including neighbouring communities where applicable).  - Minor compliance -	There is no land conflict present in area of PT IIS – Buatan Estate.  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	Complied
	rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4).  - Minor compliance -	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 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 "Hak Guna Usaha/HGU" for company and "Sertifikat Hak Milik" for smallholder.	

		During the ASA 2.3 audit, Kebun Plasma Buatan has showed the FFB payment receipt period May 2024 in accordance with official FFB price that issued by FFB Pricing Team of Province Riau (for planting years under 25). However, for the planting years in most of the KUD/smallholders are classified as over 25 years, so the price is lower than official FFB price, the price is following the market price. The official price of FFB from Dinas Perkebunan Province Riau is only regulates up to the age of the plant 25 years. The lower FFB prices has been agreed by the smallholders, the calculation has considered the OER and KER material balance for OP > 25 years (bunch analysis), so that prices remain competitive.  Based on field visit and interview with smallholder member during ASA 2.3 – the FFB price that issued by FFB Pricing Team of Province Riau was available in board of each KUD.	
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) during ASA2.3 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 for planting years under 25). According to the local regulation in Riau Province, the FFB Price updated weekly (every 7 days). However, for the planting years in most of the KUD/smallholders are classified as over 25 years, so the price is lower than official FFB price, the price is following the market price. The official price of FFB from Dinas Perkebunan Province Riau is only regulates up to the age of the plant 25 years. The lower FFB prices has been agreed by the smallholders, the calculation has considered the OER and KER material balance for OP > 25 years (bunch analysis), so that prices remain competitive.  The FFB payments conducted monthly. For example, there was a receipt of FFB payments period of May 2024 on behalf KUD Bakti, KUD Bhakti Mandiri, KUD Jaya Makmur, KUD Sumber Rejeki, and KUD Sejahtera.	Complied



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5.1.3	(C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.  - Critical (Major) compliance -	During this audit ASA2.3 has verified that the Management of PT Inti Indosawit Subur – Buatan Plasma has committed to share the RSPO premium price in accordance with the agreement with their smallholder. Premium sharing is not distributed in cash money, instead in smallholder's empowerment activities aimed at increasing the competence and competitiveness of smallholders based on participatory suggest from the smallholders.	Complied
		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:	
		<ul> <li>KUD Bhakti Mandiri (Bukit Harapan Village), dated 27 May 2024, support for owl cage "Kandang Burung Hantu/KBH" 17 pcs IDR 31,450,000.</li> </ul>	
		<ul> <li>KUD Jaya Makmur (Kumbara Utama Village), dated 27 May 2024, support for owl cage "Kandang Burung Hantu/KBH" 8 pcs IDR 14,800,000.</li> </ul>	
		<ul> <li>KUD Sumber Rejeki (Bukit Agung Village), dated 27 May 2024, support for owl cage "Kandang Burung Hantu/KBH" 4 pcs IDR 7,400,000.</li> </ul>	
		<ul> <li>KUD Sumber Rejeki (Bukit Agung Village), dated 24 June 2024, support for boundaries pages 304 pcs IDR 13,680,000.</li> </ul>	
		<ul> <li>KUD Jaya Makmur (Kumbara Utama Village), dated 24 June 2024, support for boundaries pages 86 pcs IDR 3,870,000.</li> </ul>	
		<ul> <li>KUD Bhakti Mandiri (Bukit Harapan Village), dated 24 June 2024, support for boundaries pages 68 pcs IDR 3,060,000.</li> </ul>	
		<ul> <li>KUD Sejahtera (Makmur Village), dated 24 June 2024, support for boundaries pages 30 pcs IDR 1,350,000.</li> </ul>	

		KUD Sumber Rejeki (Bukit Agung Village), dated May 2024, support for gourami fish and feed IDR 35,999,500.	
5.1.4	(C) Evidences is available that all parties, including women and independent representative organization assisting smallholders where requested, are involved in the decision making processes and understand the contracts. These include involving finance, loans/credits, and repayments through FFB price reductions for replanting and/or, other support mechanisms where applicable.  - Critical (Major) compliance -	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 the onsite audit known that some of smallholders' member were women. The annual meeting period Y2023 of KUD always invited all members which is some women. All the decision made was involved the smallholder members, including women members.	Complied
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe Minor compliance -	Based on interview with management representative during ASA2.3 i.e., public affair staff, sustainability and plasma manager obtained information that all the contract is signed by both parties.	Complied
		Based on document all contract is written in Bahasa. For example: Contract with Plasma (KUD Bakti, KUD Bhakti Mandiri, KUD Jaya Makmur, KUD Sumber Rejeki, and KUD Sejahtera) 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.	
5.1.6	(C) Agreed payments are made in a timely manner and receipts specifying price, weigh, deductions and amount paid are given.  - Critical (Major) compliance -	Based on document verification sighted that monthly invoice for FFB payment contains data of price, weigh, deductions and amount paid are given.	Complied
		During this onsite ASA 2.3 year 2024, auditor team has observed the supplier, which is PT Kinabalu Perkasa (long term agreement). Based on document verification and interview with FFB Supplier Department staff obtained information that both suppliers have been verified and visited by FFB purchasing staff. By visited the supplier's obtained information	



		that the FFB payments area in line with the agreement. Usually, FFB payments paid not more than 3 days after the FFB received by mill. There was no payments dispute or issues so far.	
5.1.7	Weighing equipment is verified by an independent third party on a regular basis.  - Minor compliance -	Based on document review during ASA2.3, it was known that Weighbridge in Buatan I POM is verified by government agency in annual basis. Latest verification was performed on 23 September 2022 by UPTD METROLOGI LEGAL Dinas Perindustrian dan Perdagangan Kabupaten Siak. Weighbridges calibration certificate were sighted during audit:	Complied
		<ul> <li>Surat Keterangan Hasil Pengujian Nomor: 510/DPP/UPTD-ML/SKHP/2023-IX/147, dated 18 September 2023, valid until 15 September 2024. Weighbridge Avery weigh Tronix; Serial Number 171050118; Type: E1205; Capacity 50,000 kg.</li> </ul>	
		<ul> <li>Surat Keterangan Hasil Pengujian Nomor: 510/DPP/UPTD-ML/SKHP/2023-IX/148, dated 18 September 2023, valid until 15 September 2024. Weighbridge Avery weigh Tronix; Serial Number 112850291; Type: E1205; Capacity 50,000 kg.</li> </ul>	
		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 document review and interview to the CSV Division during ASA2.3, it was known that the organization has a program to supports independent smallholders through CSV (Corporate Share Value) Program with Asosiasi Berkah Makmur Bersama. The CSV Division has conducted assistances for Asosiasi Berkah Makmur Bersama to carry out certification. The activity for Y2024 as follows:	Complied
		<ul> <li>Conduct training for farmers related to GAP on 12 January 2024.</li> <li>Sosialization related to the FFB prices on 20 January 2024.</li> </ul>	



		,	
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 -	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.	Complied
		Company has established a mechanism to handle complaint from external party including smallholder, " <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 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 complaint verification above indicator 4.2.3, the companies have handled complaints according to established procedures.	
		Based on the verification of the above documents and interviews with the parties (stakeholders) that the complaint handling resolution has been handled properly. In the complaint mentioned above, mediation	

		has not yet been reached involving another party (third party) as arbitrator.	
Criteria	<b>5.2:</b> The unit of certification supports improved livelihoods of smallholders a	and their inclusion in sustainable palm oil value chains.	
5.2.1	The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification.  - Minor compliance -	There are no changes of compliance statement compare to previous audit.  PT Inti Indosawit Subur – Buatan I POM 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 Indosawti Subur – Buatan I POM 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.	Complied



F 2 2	Miles and Barble the wife of a street and a	Durchard I DOM annualized by a superstate (Durchard Estate)	C
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.  - Minor compliance -	Buatan I POM supplied by own estates (Buatan Estate), smallholder from 4 KUD's and third party's supplier. Based on interview with smallholder representatives from Smallholders Scheme: KUD Bhakti Mandiri, KUD Jaya Makmur, KUD Sumber Rejeki, KUD Sejahtera Jaya (40)	Complied
		smallholders) obtained information that entire land has been granted by government (private land title/SHM).	
		According to the signboard in mill's gate, Buatan I POM does not accept FFB from illegal sources (forest area or crop stolen). All FFB from third parties shall comply with regulation. Mill's staff told that FFB Purchasing Department has set the procedures for their supplier as follows:	
		<ul> <li>New supplier shall propose their FFB purchased offer including submitted the name and land legality of each potential farmer.</li> </ul>	
		<ul> <li>FFB Purchasing Department verify the geolocation of potential farmer that submitted by the third parties.</li> </ul>	
		<ul> <li>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.</li> </ul>	
		<ul> <li>The FFB transporter shall signed the zero illegal FFB statement letter in security gate in each delivery note.</li> </ul>	
		Based on interview with smallholder representatives during ASA 2.3 2023, from KUD Bhakti Mandiri, KUD Jaya Makmur, KUD Sumber Rejeki, KUD Sejahtera Jaya (40 smallholders) 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. 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.	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: <a href="https://www.asianagri.com/en/sustainability/sustainability-reports/">https://www.asianagri.com/en/sustainability/sustainability-reports/</a> . That document is publicly available.	Complied
		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 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 (	<b>6.1:</b> Any form of discrimination is prohibited.		
6.1.1	(C) A publicity available non-discrimination and equal opportunity policy is implemented in such way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.  - Critical (Major) compliance -	Buatan I POM and Estate:  Since 2014, PT Inti Indosawit Subur has established a Company Policy on Equal Opportunity as documented in the "Company Policy", dated December 1, 2014:  "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" - memperlakukan semua anggota koperasi secara adil, dan menghormati hak asasi manusia, dan perwakilan tanpa membedabedakan 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-	Complied
		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). 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 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

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, sexual orientation, trade union membership, political affiliation and/or age".

Based on interviews with smallholders sample (10 smallholders at KUD Sejahtera and 10 smallholders at KUD Bhakti Mandiri) 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 I. 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 I POM), they stated that during their work there was no treatment from PT IIS-Buatan I 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 -	PT IIS-Buatan I has been able to show and prove that in the recruitment selection process, recruits' access to training and promotions is based on the skills, abilities, qualities and medical fitness required for the jobs available.  The worker recruitment process is based on the skills, skills and abilities of prospective workers (based on the background and experience of prospective workers). Meanwhile, for worker promotion, the company	Complied
		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.	
		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 following is the training plan program for the 2024 period:	

												<del>-</del>
			nti indosawit subur	Keterangan :Training			BMP Keb	un Trainii	ng K3Training	Lingkungar	1	_
			: : Kebun Buatan Group od : 2024	Disiapkan Oleh :Offic	er Sustainab	ility	-				_	-
		Peri	0d : 2024	Realisasi		Pencar	na dan F	Paalicaci	Program Pe	latihan (R	ulan)	-
		No		Peserta				Mar		Mei	1un	
			Nama / Judul Pelatihan	Jumlah	Renc Rea						eal Renc Re	1
		1	Pelatihan Basic Fire	11			15					
			Pelatihan Refresh SOP Pemupukan	10		13	15					
			Pelatihan Refresh SOP Panen	17		13						<b>_</b>
			Pelatihan SPBK dan Administrasi Kebakaran	11	$\perp$	15				+		<b>-</b>
			Pelatihan Refresh SOP Semprot	14	-	12	12			+-+		<b>- 1</b>
			Pelatihan Inspeksi dan Observasi Pelatihan Hama dan Penyakit Tanaman	11		13	14	_				<b>-   </b>
			Pelatihan Sustainability Awerness	16	+ +	13	14	21 21				<del>-</del>
			Pelatihan Refresh PP Online	10				21 21				<b>-    </b>
		_	Pelatihan Plantation Managements Sistem									<b>-</b>
			Pelatihan Pengelolaan Transport									<b>1</b>
			Pelatihan SOP Administrasi									
			Pelatihan CI									
			Pelatihan Investigasi				$\sqcup$		$\perp$			<b>-</b>
			Pelatihan AK3U		+	$\perp$	+	_	+		$\perp$	<b>- </b>
1			Refresh Pelatihan Auditor ISPO		+	+	+	_	+	+		<b>-  </b>
			Pelatihan Gudang Penyimpanan Limbah B3 Pelatihan Job Safety Analisis (JSA)		+	+-	+	-+	+	+ +	-	<b>⊣</b> ∣
6.1.4	Pregnancy testing is not conducted as a discriminatory measure and is	tra	sed on interviews wit orkers have received a ining program. IIS-Buatan I has a m	access to tra	aining	in a	ассо	rdar	ice wit	h the	annua	1
0.1.4	only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.	wc spi	orkers, especially wor raying). So checking	rkers who female wor	deal :	ب with for إ	chopreg	emic nan	als (fe	ertilizi ot a	ng and	d f
	- Minor compliance -	pre pre	crimination, but is t egnancies as a consic egnant female worker en be transferred to o	deration for rs do not d	r impl o wor	eme k re	entir elate	ig co	mpan	y pol	icy tha	t
		are Sa	rification of pregnand orkers by Klinik Asian A e Sum***, Gne**, Ti* r****, Sam****, Ro egnancy test was neg	Ágri Sehat **, Rin***, os***, Su	Buata Rim* r***,	n. T **,	he t Ar*	hirte **, [	een fer Mer**	nale **, D	worker es****	5
6.1.5	<b>(C)</b> A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.	by	IIS Buatan I Plantati Silvia Junita Harefa ba state No. 001/ES-KBN	ased on the	e Decr	ee f	rom	the	Manag	jer of	Buata	n



- Critical (Major) compliance -	the Determination of the Structure of the Gender Committee in the Buatan I Plantation Work Area. With regional administrators:
	1. Armainah (in the region Echo 1)
	2. Herlina Sari (in the region Echo 2)
	3. Arnita Irawati (in the region Echo 3)
	Gender Committee of PT IIS-Buatan I Plantation has stablished the Activities Program in 2024 period, such as:
	The provision of extra pudding for children in the Daycare has been realized in Thursday every month.
	2. Children's growth and development in the Child Care Center, carried out every month in the first week.
	3. Cleanliness of the environment around housing and Child Care Centers.
	4. 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.
	5. 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 Estate. An investigation has been carried out on this case and also mediation is carried out to complete it and an action plan is determined so that it does not recure (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 Buatan I Plantation has also issued Memorandum No. 604/ES-KBN/MEMO/10/2023 dated 9 October 2023 concerning the Determination of Manual Premiums.	ed
		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:	
		1. Wages of PHL amount IDR 3,395.359 per month or IDR 135.814 per day.	
		<ol> <li>Wages of SKUH amount IDR 3,395,359 per month.</li> <li>The wage of SKUB is in accordance with the wage scale structure adjusted in the 2024 wage table.</li> </ol>	
		Natura - Rice allowance in the form of rice in accordance with the provisions of the Collective Labor Agreement (PKB) for SKUH and SKUB workers	
		Buatan I 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, as follows: PT. INTI INDOSAWIT SUBUR KETENTUAN BASIC BORONG P2 RATA OUTPUT PREMI BASIC OUTPUT BASIC OUTPUT BORONG DINAS DINAS LBH BRG BORONG DINAS LBH BRG DINAS LBH BRG KG KG JJG KG RP JJG KG RP JJG KG RP <3.00 2.5 8000 248 270 621 216 540 313 184 459 389 3.5 227 3 01-4 00 8000 794 302 200 699 605 421 4.01-5.00 4.5 194 8000 875 335 173 778 680 454 5.01-7.00 6.0 8000 173 1,037 389 157 940 432 140 842 497 7.01-9.00 8.0 8000 1,123 130 1,037 119 950 540 9.01-11.00 10.0 8000 113 1,134 108 1,080 540 97 972 605 11.01-13.00 1,231 572 97 1,166 605 86 1.037 680 1.285 637 13.01-15.00 14.0 86 1.210 680 76 1,058 778 15.01-17.00 16.0 8000 81 1,296 724 76 1.210 778 65 1,037 1,031 17.01-20.00 18.5 8000 70 1,299 832 65 1.199 896 999 1.242 20.01-23.00 21.5 8000 59 1,277 983 54 1,161 1,242 49 1,439 1.045 1,199 8000 1,166 46 1,115 1,441 43 1,037 23.01-25.00 24.0 1,620 8000 1,123 1,553 41 1,067 1,711 38 25.01-27.00 26.0 1.931 1,776 32 29.0 8000 1,096 36 1,034 940 2,255 >27.00 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. Criteria 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW). 6.2.1 (C) Documentation of pay and working conditions in accordance with PT IIS-Buatan Group has set wages based on the minimum wage set by Complied applicable labour laws are available to the workers in national languages the Governor of Riau in 2024. Based on the Decree of the Governor of and explained to them in language they understand. Riau No. Kpts.7618/XI/2023 dated 30 November 2023 concerning the Regency/City Minimum Wage in Riau Province in 2024 amounting to IDR - Critical (Major) compliance -3,395,359 per month.



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 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 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:

- 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.
- 4. 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 accordance with the 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 I 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 - "Surat Perjanjian Kerjasama" with the workers, i.e: Working Agreement Letter on behalf of Mr. Sutoyo (as Harvester) at KUD Bhakti Mandiri dated 12 January 2023, on behalf of Mr. Kardiman at KUD Jaya Makmur date 10 January 2023.

Based on interviews with smallholder samples (20 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 Buatan I Estate (nucleus).	
5.2.2	(C) Employment contracts and related documents detailing payments and	Buatan I POM and Estate:	Complied
	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.	PT IIS – Buatan I Plantation 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 I POM. Each type of worker has an Employment Agreement:	
	- Critical (Major) compliance -	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.	
		Casual Daily Worker (PHL) uses a Daily Work Agreement, verification is carried out on the Daily Work Agreement:	
		<ul> <li>Perjanjian Kerja Harian - Daily Work Agreement No. 13148 / PKH / KBN / 03/2022 dated March 18, 2022 in the name of Jepen Sumantri Panjaitan (Upkeep)</li> </ul>	
		<ul> <li>Perjanjian Kerja Harian - Daily Work Agreement No. 11009 / PKH / KBN / 02/2014 dated February 03, 2014 in the name of Sukari (Upkeep)</li> </ul>	
		<ul> <li>Perjanjian Kerja Harian - Daily Work Agreement No. 11448 / PKH / KBN / 12/2014 dated December 1, 2014 in the name of Muhammad Fikri Rahmadan (Upkeep)</li> </ul>	
		3. Outsourcing workers as many as 2 people as sorting workers in Buatan I POM as of 3 July 2024 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

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).

PT IIS -Buatan Plantation 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:

: June	2024	
: Suka	ari	
: 1100	)9	
: PHL		
: Nurserry		
	,	
18	,	
18	<u>,                                      </u>	
18	2,444,658	
	2,444,658 471,628	
	: Suka : 1100 : PHL	



Sub Total I	IDR 2,916,286
Deduction:	
BPJS-Kesehatan I	IDR 33,954
BPJS-Ketenagakerjaan I	IDR 67,907
	IDR 101,861
Net Salary I	IDR 2,814,425
Pay Slip Period	: June 2024
Empl. Name	: Japen S.P.
Empl. Num.	: 13148
Grade	: PHL
Position	: Nurserry
Working days	20
Basic salary	IDR 2,716,287
	IDR 603,256
Over time	IDR -
Sub Total	IDR 3,319,543
Deduction:	
BPJS-Kesehatan	IDR 33,954
BPJS-Ketenagakerjaan	IDR 67,907
Sub total	IDR 101,861
Net Salary	IDR 3,217,682



Net Salary	IDR	3,865,124			
Sub total	IDR	101,861			
BPJS-Ketenagakerjaan	IDR	67,907			
BPJS-Kesehatan	IDR	33,954			
Deduction:					
Sub Total	IDR	3,966,985			
Over time	IDR	-			
Premium	IDR	1,250,698			
Basic salary	IDR	2,716,287			
3 - 7 -					
Working days		, 20			
Position	: Nur	serry			
Grade	: PHL	: PHL			
Empl. Num.	: 114	48			
Empl. Name	: M. F	ikri R.			
Pay Slip Period	: Jun	e 2024			

Based on document reviews and interviews with worker samples, PT IIS -Buatan I has implemented wages in accordance with applicable rules and regulations.

#### **Scheme smallholder:**

The determination of wages for workers in Plasma Buatan I 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 (20 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 Buatan I Estate (nucleus).

The Cooperative/KUD aslo have working agreement letter - "Surat Perjanjian Kerjasama" with the workers, i.e: Working Agreement Letter on behalf of Mr. Sutoyo (as Harvester) at KUD Bhakti Mandiri dated 12 January 2023, on behalf of Mr. Kardiman at KUD Jaya Makmur date 10 January 2023.

In this surveillance audit, verification was carried out on the salary payment forms for workers as follows:



		<ul> <li>Harvesters on behalf of Sutoyo for the harvest on KUD Bhakti Mandiri field on period May 2024, for harvesting FFB: 2 rotation:</li> <li>3,550 kg FFB with wages of IDR 150 per kg, total wages of IDR 532,500.</li> </ul>	
		- Harvesters on behalf of Kardiman for the harvest on KUD Jaya Makmur field period May 2024, for harvesting FFB: 2 rotation: 4,070 kg FFB with wages of IDR 150 per kg, total wages of IDR 610,500.	
		Based on the verification of the harvester wage payment form above, KUD/Koperasi Plasma Buatan I 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 I 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.	Complied
		Statements about wages, stated in PKB in Article V concerning Wages-Upah; stated: "Pekerja harian Tetap dan Pekerja Bulanan diberi upah berupa uang yang ditetapkan berdasarkan kesepakatan bersama dengan BKS-PPS dengan PD.FSP.PP-SPSi Propinsi yang bersangkutan sesuai dengan peraturan perundangan Otonomi Daerah yang berlaku, yaitu upah uang ditambah beras pekerja senilai/sejumlah 15 Kg (Upah BKS-PPS), dengan mengingat situasi ekonomi dan kemampuan perusahaan" - Permanent daily workers and monthly workers are given wages in the form of money determined based on a mutual agreement with the BKS-PPS and the PD.FSP.PP-SPSi of the relevant province in accordance with the applicable Regional Autonomy laws and regulations,	



namely wages in money plus workers' rice worth/amounting to 15 kg (BKS-PPS Wages), taking into account the economic situation and the company's capabilities.

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 2018-2020 in Article V; *Upah* - Wages, which explains:

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

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 (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 April-May 2024.  2. Payslip of employee on May-June 2024 period (see 6.2.1)  3. Surat Perintah Lembur (SPL) – Over time order for example:  • SPL on 18 May 2024on behalf of Roni Elko G. (PMKS Buatan I) for process work in PBS for 4 hours.  • SPL on 15 June 2024 on behalf of Nur Suma (PMKS Buatan I) for equipment repair in the process room in PBS for 2 hours.  4. Leave Application Letter on behalf of Nasikun (Buatan I Estate as harvest), for annual leave taken on June 24–27 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 Buatan I Estate and Buatan I 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.	
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 is no change related to the number of facilities from last year regarding facilities and infrastructure for workers (worker housing and public facilities). Here is a list of facilities and infrastructure for workers and other public facilities:  The facilities, such as:  Housing complex (399 units);  Elementary (1 unit) and kindergarden (1 units);	Complied



- Polyclinic (1 unit);
- Mosque (2 units);
- Church (1 unit);
- Creche (1 units);
- School bus (2 units);
- Ambulance (1 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.

The company has made a plan to carry out renovation and maintenance of worker housing in the annual budget and is distributed based on cash flow/details every month. In 2024 there was a realization of maintenance and renovation of worker housing, especially for housing types C and E, as follows:

	URAIAN	STN	Total Unit	2024			BUDGET 2024		
No.				AKTUAL	TAKSASI	APPROX.	Harga/ Unit	Total	Realisasi Fisik (%)
				Rp'000	Rp'000	Rp'000	Rp'000	Rp'000	
1	Rehap Rumah Tipe C	Unit	3	144,545	2,380	146,925	48,990	146,970	100%
2	Rehap Rumah Tipe E	Couple	10	190,821	109,179	300,000	30,000	300,000	100%
				335,366	111,559	446,925		446,970	

The realization of repairs/maintenance of workers' housing has reached 100% of the budget until 2024 as of June 25, 2024.

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.



		Scheme samliholder:	
		All workers in Buatan scheme smallholder has own house with water and electricity supplies from government (PLN). Based on interview with smallholder in explained that the worker has their own house in the village, and they are satisfied with the condition. Plasma Buatan I plantations are relatively close to residential areas/village communities who are also workers in the plasma plantations. So in Plasma Buatan I there is no dedicated employee housing.	
6.2.5	The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.  - Minor compliance -	Buatan I POM and Estate:	Complied
		PT Inti Inti Indosawit Subur – Buatan Group has demonstrated an effort to improve worker's access to adequate, sufficient and affordable food.	
		The company provides minimarket which managed by the cooperative and traditional market is nearby surrounding company area, mostly goods needed by employees is provided by the minimarket and cooperative. Price in minimarket and cooperative was affordable and cheaper than traditional market nearby company area. Price control by cooperative and all member including workers and company management.	
		Scheme smallholders:	
		There is a market in the village where smallholder workers stay. Access road and the availability of foods and other basic needs was easy to found with competitive price/affordable. Price determined by the market and control by government.	
6.2.6	A DLW is paid to all workers in accordance with applicable regulations,	Buatan I 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.	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	
	- Minor compliance -	-	



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. Based on the verification the results of the DLW calculation in year 2024 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

#### **PROCEDURAL NOTE:**

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

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

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

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

6.2.7	1 ,	Buatan I POM and Estate:	Complied
	the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.  - Minor compliance -	PT IIS – Buatan I Plantation 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 I POM. Each type of worker has an Employment Agreement:	



- 1. SKUH and SKUB use the Joint Work Agreement of BKS PPS (*Badan Kerja Sama Perusahaan Perkebunan Sumatera*) for the period 2022 2024.
- 2. Casual Daily Worker (PHL) uses a Daily Work Agreement, verification is carried out on the Daily Work Agreement:
  - Perjanjian Kerja Harian Daily Work Agreement No. 13148 / PKH / KBN / 03/2022 dated March 18, 2022 in the name of Jepen Sumantri Panjaitan (Upkeep)
  - Perjanjian Kerja Harian Daily Work Agreement No. 11009 / PKH / KBN / 02/2014 dated February 03, 2014 in the name of Sukari (Upkeep)
  - Perjanjian Kerja Harian Daily Work Agreement No. 11448 / PKH / KBN / 12/2014 dated December 1, 2014 in the name of Muhammad Fikri Rahmadan (Upkeep)
- 3. Outsourcing workers as many as 2 people as sorting workers in Buatan I 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 SKUH promotion program until June 2024:



EDI	ın Buatan I			
No.	Employe Name	Position	Memorandum	
			Number	Date
1	Libertus Lai	Harvester	149/HR-RO2/MEMO/SK/06/2023	30-Jur
2	Saiful	Harvester	150/HR-RO2/MEMO/SK/06/2023	30-Jur
3	Eka Agus Susilo	Harvester	151/HR-RO2/MEMO/SK/06/2023	30-Jur
4	Dirkaman Laila	Harvester	152/HR-RO2/MEMO/SK/06/2023	30-Jur
5	Herip Rayudi	Harvester	153/HR-RO2/MEMO/SK/06/2023	30-Jur
6	Rafael Mahardika Nainggolan	Harvester	154/HR-RO2/MEMO/SK/06/2023	30-Jur
10	Efendi P. Sibarani	Harvester	056/HR-RO2/MEMO/SK/03/2023	31-Ma
11	Pastikan Laila	Harvester	056/HR-RO2/MEMO/SK/03/2023	31-Ma
12	Pandi	Harvester	054/HR-RO2/MEMO/SK/03/2023	31-Ma
13	Yusurama Tofenao	Harvester	053/HR-RO2/MEMO/SK/03/2023	31-Ma
14	Onius Gea	Harvester	052/HR-RO2/MEMO/SK/03/2023	31-Ma
15	Hagianto Hasugian	Harvester	051/HR-RO2/MEMO/SK/03/2023	31-Ma
16	Yusup Matondang	Harvester	050/HR-RO2/MEMO/SK/03/2023	31-Ma
17	Viktor Odaligo Harefa	Harvester	049/HR-RO2/MEMO/SK/03/2023	31-Ma
18	Ibezaro Halawa	Harvester	048/HR-RO2/MEMO/SK/03/2023	31-Ma
19	Markus Nduru	Harvester	047/HR-RO2/MEMO/SK/03/2023	31-Ma
20	Mariski Anggiat Marito	Harvester	046/HR-RO2/MEMO/SK/03/2023	31-Ma
21	Ari Aji	Harvester	155/HR-RO2/MEMO/SK/06/2023	30-Jur
22	Sugiarto	Harvester	180/HR-RO2/MEMO/SK/03/2024	30-Ma
23	Odaligo Waruwu	Harvester	181/HR-RO2/MEMO/SK/03/2024	30-Ma
24	Dedy Herianto Halawa	Harvester	182/HR-RO2/MEMO/SK/03/2024	30-Ma
25	Jaya Kristinus Hulu	Harvester	183/HR-RO2/MEMO/SK/03/2024	30-Ma
28	Kiplen Simamora	Harvester	186/HR-RO2/MEMO/SK/03/2024	30-Ma



Memorandum issued by Head HR Ops.				
Buat	an I POM			
No.	Employe Name	Position	Memorandum	
140.	Linploye Name	Position	Number	Date
1	Ilyas	Workshop	109/HR-RO2/MEMO/SK/01/2024	02-Jan-
2	Bagas Pramuda	Process	110/HR-RO2/MEMO/SK/01/2024	02-Jan-
3	Mulyana Yusuf	Process	111/HR-RO2/MEMO/SK/01/2024	02-Jan
4	Wahyu Wiranta	Dispatch Boy	112/HR-RO2/MEMO/SK/01/2024	02-Jan
5	Shamora Della Hoya	Process	113/HR-RO2/MEMO/SK/01/2024	02-Jan
6	Frialdi Yafet Lubis	Process	114/HR-RO2/MEMO/SK/01/2024	02-Jan
7	Haldy Fahreza	Process	115/HR-RO2/MEMO/SK/01/2024	02-Jan
8	Josua F.M.	Process	116/HR-RO2/MEMO/SK/01/2024	02-Jan
9	Muhammad Reza P.	Process	117/HR-RO2/MEMO/SK/01/2024	02-Jan
10	Mhd. Rio Andika P.	Process	118/HR-RO2/MEMO/SK/01/2024	02-Jan
11	Partogi Simanjuntak	Process	118/HR-RO2/MEMO/SK/01/2024	02-Jan

The progress of the harvester promotion program at PT IIS Buatan I Estate and POM until June 2024 is as follows:

- Old-recruited harvesters with PHL status, there are still 25 harvesters and will soon be promoted to SKUH in semester II/2024
- Palm oil processing workers at Buatan I POM with PHL (nonpermanent) status, until June 2024 there are still 4 workers and will soon be promoted to SKUH in semester II/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 Buatan I Estate and processing workers at Buatan I 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. Sutoyo (as Harvester) at KUD Bhakti Mandiri dated 12 January 2023, on behalf of Mr. Kardiman at KUD Jaya Makmur date 10 January 2023.	
		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.	
	<b>6.3:</b> The unit of certification respects the rights of all personnel to form and iation and collective bargaining are restricted under law, the employer facile.		
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.  As for Buatan Plasma, KUD also has a policy related to freedom of association which is contained in the CS Policy under "Kebijakan Group Manager".  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	Complied



		PMKS – II Buatan" dated 29 December 2011 by Labor and Trangmigration Agency of Pelalawan Regency.  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:  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	Complied
		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.	
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 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.	Complied
Criteria	<b>6.4:</b> 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	Complied



in Company Regulation: [14]; Prohibiting children from working in any company activities.

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). 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.

#### 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



		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 (10 smallholders at KUD Sejahtera and 10 smallholders at KUD Bhakti Mandiri) 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 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
		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:	
		1. At Buatan I Estate; the youngest worker is Jepen S., born on 01/25/2003 and recruited on 03/01/2022 at the age of 19 years and 1 month.	



2. Di Buatan I POM; the youngest worker is Khairul Armad., born on 22/02/2004 and recruited on 16/01/2024 at the age of 19 years and 11 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 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

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 (10 smallholders at KUD Sejahtera and 10 smallholders at KUD Bhakti Mandiri) 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 are on average 30-35 years old and are married, they know this from the worker's ID card.



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 "*Kebijakan Perusahaan*" signed by Managing Director on 1st December 2019. In the policy stated that Company are prohibited to employ the child in the company operation. Child employee are under age 18th years old according to UU No. 13 Tahun 2003. 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.

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:

- 3. At Buatan I Estate; the youngest worker is Jepen S., born on 01/25/2003 and recruited on 03/01/2022 at the age of 19 years and 1 month.
- 4. Di Buatan I POM; the youngest worker is Khairul Armad., born on 22/02/2004 and recruited on 16/01/2024 at the age of 19 years and 11 month.

Based on interviews with a sample of workers, they stated that up to now, there are no workers under 18 years of age.

It was added that the company also has a policy related to respect for human rights i.e Human Rights Policy including in the Company Policy update on 1 December 2019 including the policy on protection of human Complied



		rights defenders (HRDs)/Whistle-blowers. It is stated that if young workers are not employed in high-risk operations (chemicals and have high safety and health risks) and will be supervised by the foreman/supervisor in its operations.	
		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.	
		<ul> <li>KUD Jaya Makmur (Scheme Smallholder) dated 08 August 2023, has been socialized to all smallholders on 08 August 2023</li> </ul>	
		- 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	
		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 (10 smallholders at KUD Sejahtera and 10 smallholders at KUD Bhakti Mandiri) 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 are on average 30-35 years old and are married, they know this from the worker's ID card.	
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	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	Complied



	protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.  - Minor compliance -	<ul> <li>(above). This policy is always communicated to all workers, stakeholders including suppliers and contractors. Communication is carried out in several ways, including:         <ul> <li>Socialization of Company Regulation: The company policy has</li> </ul> </li> </ul>	
		been communicated to all employees of PT Inti Indosawit Subur – Buatan Group on 12-14 February 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.	
		<ul> <li>By installing warning boards (prohibition of child labor) in strategic places at the Buatan I Plantation head office, the Afdeling office, worker housing and other places considered strategic. The auditor team has verified the installation of the warning boards at the main plantation office and the afdeling office.</li> </ul>	
		<ul> <li>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</li> </ul>	
		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: <a href="mailto:whistleblow@rgei.com">whistleblow@rgei.com</a> .	
Criteria	<b>6.5:</b> There is no harassment or abuse in the workplace, and reproductive rig	hts 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 -	A policy to prevent sexual and all other form of harassment and violence are available in "Kebijakan Perusahaan" signed by Managing Director on 1st December 2019. In the policy point 15 stated that " <i>Mencegah pelecehan seksual dan berbagai bentuk kekerasan terhadap perempuan serta melindungi hak-hak reproduksinya</i> ". The policy is written in Bahasa	Complied



		Indonesia, this policy has been informed and communicated to all employees and being placed into public area easily accessed.  The policy has been communicated to all level workforce, sample seen: socialization to workers on 12 February 2024. Socialization to workers also conducted through muster morning and banner/poster available in Afdeling/Mill Office.	
6.5.2	(C) A policy to protect the reproductive rights of all, especially of women, is documented, implemented and communicated to all levels of the workforce.  - Critical (Major) compliance -	A policy to protect the reproductive rights of all, especially of women are available in "Kebijakan Perusahaan" signed by Managing Director on 1 <sup>st</sup> December 2019. In the policy point 15 stated that " <i>Mencegah pelecehan seksual dan berbagai bentuk kekerasan terhadap perempuan serta melindungi hak-hak reproduksinya</i> ". The policy is written in Bahasa Indonesia, this policy has been informed and communicated to all employees and being placed into public area easily accessed.  The policy has been communicated to all level workforce, sample seen: socialization to workers on 12 February 2024. Socialization to workers also conducted through muster morning and banner/poster available in	Complied
		Afdeling/Mill Office.  Policies that have been made by companies related to the protection of women's rights such as;	
		a. The company has provided menstrual leave for female employee in accordance with the recommendation from paramedic in clinic, and this is in line with "Perjanjian Kerja Bersama" and applicable regulations.	
		b. The company has granted the right for maternity leave the women who gave birth in accordance with the applicable rules and "Perjanjian Kerja Bersama".	
		c. The company has consistently performed pregnancy tests to women workers who worked as a fertilizer and spraying every 1 month.	



		<ul> <li>d. The company has a policy of not hiring female labor during pregnancy or breast-feeding for the kind of work that endanger such as fertilizer or spraying by temporarily moving the work force to other types of work.</li> <li>The company has consistently performed regular health checks for sprayers every six months.</li> </ul>	
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 4 May 2024 to 2 young mothers at PKS Buatan I and buatan Plantation.	
		From the results of surveys and consultations, management issued several policies, including:	
		<ul> <li>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.</li> </ul>	
		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 2.3 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:  "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".  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 <a href="https://www.asianagri.com/id/panel-keberlanjutan/keluhan-pengaduan">https://www.asianagri.com/id/panel-keberlanjutan/keluhan-pengaduan</a> .  Asian Agri is committed to responding quickly and constructively to any grievance raised against any of our own operations or our suppliers, and	Complied
		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, labor issues, etc.	



		Based on interviews with stakeholders and related government agencies in Pelalawan Regency, in the 2023-2024 (up to June) period, there were no recorded complaints from external parties (community around the plantation).	
Criteria	<b>6.6:</b> No forms of forced or trafficked labour are used.		
6.6.1	<ul> <li>(C) All work is voluntary and the following are prohibited:</li> <li>Retention of identity documents or passports;</li> <li>Payment of recruitment fees;</li> <li>Contract substitution without worker's consent</li> <li>Involuntary overtime;</li> <li>Lack of freedom of workers to resign</li> <li>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</li> <li>Debt bondage</li> <li>Withholding of wages</li> <li>Critical (Major) compliance -</li> </ul>	<ul> <li>During this surveillance audit and according to work contract, confirmed that all work is voluntary and there is no:</li> <li>Retention of identity documents or passports;</li> <li>Payment of recruitment fees;</li> <li>Contract substitution without worker's consent</li> <li>Involuntary overtime;</li> <li>Lack of freedom of workers to resign</li> <li>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</li> <li>Debt bondage</li> <li>Withholding of wages</li> <li>No form of forced labor occur in PT Inti Indosawit Subur – Buatan I POM and 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 "Tidak memberikan pekerjaan dibawah ancaman, sanksi atau hukuman dimana pekerja tidak memiliki kebebasan untuk menyepakati pelaksanaan pekerjaan".</li> <li>All workers, including temporary workers, have a work agreement; regulates the scope of work, term of work agreement, working hours,</li> </ul>	Complied



		salary payments, overtime and BPJS. Based on verification of the master list of employees for the period June 2023 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	During audit it was confirmed that, there is no migrant workers in PT IIS Buatan I POM and Estate including scheme smallholder.	Complied
	workers are employed, a specific labour policy and procedures are established and evidence of implementation is available.  - Critical (Major) compliance -	For permanent workers, term and condition Company has agreement in PKB which contain term and condition for workers. For casual workers contract available in "Perjanjian Kerja Harian Lepas".	



		Labour policy are provided in "Kebijakan Perusahaan" and procedure to manage the workers are available in SOP AA-HR-305.2 – RO Rekrutmen dan Seleksi Karyawan, dated 1 February 2009.	
		PT Inti Indosawit Subur – POM Buatan I and Buatan I 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 I POM and Buatan I Estate on 11 August 2020. These procedures explain in detail the mechanism for recruiting non-permanent workers, promotion of non-permanent workers to 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	<b>6.7:</b> The unit of certification ensures that the working environment under its	s control is safe and without undue risk to health.	
Criteria 6.7.1	<b>(C)</b> 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.  - Critical (Major) compliance -	Responsible person for H&S are defined in P2K3 (safety committee) structure of PT Inti Indosawit Subur – Buatan. P2K3 structure has been approved by Agency of manpower and tramigration Riau province based on "Keputusan Kepala Dinas Tenaga Kerja dan Transmigrasi Provinsi Riau No. KEP.164/Disnakertrans-PK/SK-P2K3/V/2023 Tentang Pengesahan Panitia Pembina Keselamatan dan Kesehatan Kerja (P2K3) pada PT Inti Indosawit Subur Pabrik Buatan Satu" dated 9 May 2023. Organisation structure:	Complied
	(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 person for H&S are defined in P2K3 (safety committee) structure of PT Inti Indosawit Subur – Buatan. P2K3 structure has been approved by Agency of manpower and tramigration Riau province based on "Keputusan Kepala Dinas Tenaga Kerja dan Transmigrasi Provinsi Riau No. KEP.164/Disnakertrans-PK/SK-P2K3/V/2023 Tentang Pengesahan Panitia Pembina Keselamatan dan Kesehatan Kerja (P2K3) pada PT Inti Indosawit Subur Pabrik Buatan Satu" dated 9 May 2023. Organisation structure:  - Leonardo Madona: Chairman of P2K3	Complied
	(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 person for H&S are defined in P2K3 (safety committee) structure of PT Inti Indosawit Subur – Buatan. P2K3 structure has been approved by Agency of manpower and tramigration Riau province based on "Keputusan Kepala Dinas Tenaga Kerja dan Transmigrasi Provinsi Riau No. KEP.164/Disnakertrans-PK/SK-P2K3/V/2023 Tentang Pengesahan Panitia Pembina Keselamatan dan Kesehatan Kerja (P2K3) pada PT Inti Indosawit Subur Pabrik Buatan Satu" dated 9 May 2023. Organisation structure:	Complied



OHS expert on behalf Sona Evan, certificate number: No. Ser.18 13990/AK3/U/III/2018 dated 5 March 2018; Keputusan Menteri Ketenagakerjaan RI Nomor 5/1595/AS.02.04/III/2021 Tentang Penunjukan Ahli K3 Umum Menteri Ketenagakerjaan RI, dated 31 March 2021, valid until 3 years until 31 March 2024.

The company has shown a letter from PJK3 PT Arpindo Multi Utama with number 915/AMU/K3/VII/2024 on 6 July 2024, stating that the AK3U license card a.n Sona Evan is in the process of being processed at the Indonesian Ministry of Manpower.

P2K3 structure has been approved by Agency of manpower and tramigration Riau province based on "Keputusan Kepala Dinas Tenaga Kerja dan Transmigrasi Provinsi Riau No. KEP.769/Disnakertrans-PK/SK-P2K3/VI/2024 Tentang Pengesahan Panitia Pembina Keselamatan dan Kesehatan Kerja (P2K3) pada PT Inti Indosawit Subur – Kebun Buatan" dated 20 June 2024. Organisation structure:

- Andreas RF Sitompul: Chairman of P2K3
- Deny Manarihon Sitompul: Secretary (OHS expert)
- Member: 21 Person.

OHS expert on behalf Deny Manarihon Sitompul, certificate number: No. 5/0059270123/AS.01.03/I/2023 dated 27 January 2023; Keputusan Menteri Ketenagakerjaan RI Nomor 5/290/AS.01.03/I/2023, Tentang Penunjukan Ahli K3 Umum Menteri Ketenagakerjaan RI, dated 27 January 2023 valid for 3 years, up to 27 January 2026.

Report of P2K3 period 2023-2024:

- P2K3 report for the third quarter of 2023 was reported on 9 October 2023 to the Pelalawan District Manpower Office.
- P2K3 report for the fourth quarter of 2023 was reported on 18

		January 2024 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.	
		For scheme smallholder, because management is carried out directly by PT Inti Indosawit Subur, the person in charge of OHS in all activities is monitored by the company's General OHS expert, which includes to the Buatan Estate.	
6.7.2	Accident and emergency procedures in Indonesian language are in place and clearly understood by all workers. Assigned operatives trained in first aid are present in both field and other operations. First aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.  - Minor compliance -	There were established several documented procedures related to accident and emergency procedure in local language Bahasa Indonesia. Accident and emergency procedures no. AA-EMS-446-PR (operation control), AA-EMS-447-PR (Emergency preparedness), AA-EMS-001-FM (Emergency plan), AA-EMS-003-FM (Emergency incident), and AA-EMS-004-FM (Emergency incident Reporting).	Complied
		According to the emergency procedure, the emergency conditions have been identified including Fire and explosion at buildings; land fire; earthquake; flooding; chemical spill and poisonings also waste water ponds spillage. The procedures described the roles and responsibilities of each emergency response team include the mechanism how to conduct medical evacuation to near hospital/local health centre, the emergency contact number of each internal emergency team and external related parties such as public fire station at local area Kabupaten Labuhan Batu and Public health centre were also available.	
		Company has formed the emergency response team as per "Struktur Organisasi Tanggap Darurat". During audit can be demonstrated emergency response team for Buatan I POM and Estate. Emergency	

		response team has conducted the regular training to response the emergency situation, sample seen: Basic Fire training on 29 Mei 2023. PT Inti Indosawit Subur Buatan I POM and Estate has appointed the licenced First Aider which is Foreman in each department/Afdeling. First aid training has been carried out by company, sample seen: First aid training on 29 January 2024; First aid training deliver by company doctor and paramedic.  First aid equipment are available in the worksite both in Buatan I POM and Estate.  Record of accident are available in "Laporan kecelakaan Kerja" Buatan I POM and Estate. Report of accident period January – December 2023	
		and January – June 2024 are available. Each accident case were followed up by investigation as record in "Rekaman Kecelakaan Kerja" which explain the detail of accident case, rootcause analysis and follow up action.  Accident report are review in regular basis each month through P2K3 meeting. Record of P2K3 meeting can be demonstrated during audit, sample seen: P2K3 meeting January – June 2024.	
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 I 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 I POM and Estate it was sighted that all workers has use appropriate PPE during working and they explained that PPE is provided free of charge, when the PPE is broken because of the working usage workers can request to change for the new PPE.	Complied

		PPE provision of Buatan I POM was sighted in ""Serah Terima Sepatu Karyawan Tahun 2024" and "Pengambilan APD". PPE provision: helmet, earplug, earmuff, masker, leather handgloves, rubber handgloves,	
		cotton handgloves, safety glasses, face shiled.	
		Safety briefing/safety talk recorde in "AA-SOP-HSE-008B", latest safety talk on 24/06/2023 in Buatan I POM. Safety talks are conducted every morning and notifications through loudspeakers in the factory every shift change.	
		PT Inti Indosawit Subur Buatan Estate has provided 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 Buatan Estate, can be demonstrated that sanitation facilities are well function and sufficient for spraying workers.	
6.7.4	All workers are provided medical care and covered by accident insurance. Costs incurred from work related incidents, leading to injury or illness, are	All workers have been provided with medical care and accident insurance (BPJS Ketenagakerjaan & BPJS Kesehatan).	Complied
	covered in accordance with applicable regulations or by the unit of certification if applicable regulations do not provide protection.	The insurances were still valid as seen by the recent slip payment in January – December 2023 and January – June 2024 for estate and mill.	
	- Minor compliance -	Several insurance payments are reviewed and are in accordance with the number of workers. Sample seen for insurance payment:	
		- BPJS Ketenagakerjaan Payment Kebun Buatan period June 2024 (24 June 2024) for 202 permanent workers. Insurance including JKK, JKM and JHT, JP with fee code 400000062044.	
		- BPJS Ketenagakerjaan Payment Kebun Buatan period June 2024 (24 June 2024) for 220 casual workers. Insurance including JKK, JKM and JHT, JP with fee code 400000063566.	
		- BPJS Ketenagakerjaan Payment PMKS Buatan period June 2024 (24 June 2024) for 119 workers. Insurance including JKK, JKM and JHT, JP with fee code 416027785000.	

		- BPJS Kesehatan Payment Kebun Buatan period June 2024 (5 June 2024). With VA 8888890000692203.	
		- BPJS Kesehatan Payment Mill Buatan and workshop period June 2024 (6 June 2024). With VA 8888890000692539.	
		- BPJS Ketenagakerjaan Payment workshop period June 2024 (6 June 2024) for 35 permanent workers. Insurance including JKK, JKM and JHT, JP with fee code 416050031000.	
		- BPJS Ketenagakerjaan Payment workshop period June 2024 (6 June 2024) for 35 casual workers. Insurance including JKK, JKM and JHT, JP with fee code 416050037000.	
		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 I 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: Report of P2K3 period 2023 and period January – June 2024: Buatan I POM and estate has been submitted to Disnaker Kabupaten pelalawan as described in indicator 6.7.1	
		In Buatan I POM and 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 Buatan Period 2023: FR = 18.6 and SR = 89.5	



·		Buatan I POM: 39.5 and SR = 136.5	
Principl	e 7: Protect the environment, conserve biodiversity and ensu	re sustainable management of natural resources.	
Criteria	7.1: Pests, diseases, weeds and invasive introduced species are effect	tively managed using appropriate Integrated Pest Management (IPM	1) techniques.
7.1.1	(C) IPM plans are implemented and monitored to ensure effective pest control.  - Critical (Major) compliance -	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 be implemented integrated pest management, there is no change related to SOP.  Based on document verification obtained 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 rat infestation by recap the record of sortation in loading ramp.  • Census of Barn Owl Box occupation in three monthly bases.  During this ASA 2.3, auditor has observed and interview with pest monitoring officer. Barn-owl box observed at Block B20e Afdeling II Buatan Estate obtain information that the pest infestation was monitoring on daily bases.  PT Inti Indosawit Subur – Buatan I POM has train pest monitoring officer (3 person each division). Each block has an observational row (multiples of five, starting from the fifth row). Observations are made every month. The outermost tree in the line of observation has been red marked to facilitate the pest control officer.  PT Inti Indosawit Subur – Buatan I POM has conducted pest and disease census in daily bases. Item to check was leaf eating caterpillar, rat infestation and Ganoderma. The record of monitoring reported to pest and disease officer and field assistant as decided to control or not.	Complied



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 -	Based on document review and interview to the management during ASA2.3, it was known that PT Inti Indosawit Subur – Buatan Group 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 www.cabi.org on in global invasive species database http://www.iucngisd.org/gisd/search.php.	Complied
	Evidence available such as "Rekapitulasi sensus Orycthes", "Rencana Sensus Normal Serangan Ulat Kebun Buatan", "Rencana dan Realisasi Tanam Beneficial Plant 2023/2024 Kebun Buatan".  During the field observation in Afdeling II Buatan I Estate, obtain information that the observation conducted to monitor the infestation of leaf eater caterpillar, bag worm, Ganoderma, rat, termite and disease. The record of observation written in daily pest infestation report. All of two pest monitoring officers can explain the pest monitoring procedure and reporting process.  Scheme Smallholder:  According to document verification, pest monitoring and control sighted pest management plan to conduct caterpillar/bag worm census in by monthly and barn owl box monitored in three monthly bases. Census was conducted by field supervisor that help by person that assign by board of KUD.  During the field visit in each KUD blocks (KUD Bhakti Mandiri, KUD Jaya Makmur, KUD Sumber Rejeki and KUD Sejahtera) during ASA 2.3, visually there was no issues related to the outbreak or infestation. However, there were a usage of natural predator (Tyto alba) to reduce a rat infestation.	



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 do stakeholders a that there is n	Complied				
Criteria	iteria 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.						
7.2.1	(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.  - Critical (Major) compliance -						Complied
	metsulfuron, triklofir, diuron, lamda sihalotrin and 2,4-D dime amina, bacillus thuringiensis berliner, ammonium glufosinat, acepha copper oxide and mancozeb.						
		Certificate holder no longer using paraquat since 15 November 2019, according to the circular letter of Deputy Managing Director No. 008/DMD/MEMO/OCT/19 dated 22 October 2019.					
		According to the national regulation, all pesticide used by the management unit has registered in agricultural ministry of Indonesia. It can be check in http://pestisida.id/simpes_app/index.php.					
		PT Inti Indosawit Subur – Buatan I already has a list of pesticides use that refers to the "Penggunaan Pestisida dan LD50 Tahun 2024" as follows:					
		Brand	Active Ingredient	LD50	WHO Class	Target use	



		1-1						7 1
		Meta prima	Methyl metsulfuron	5000	III	Weeds	with broadleaf	
		Supremo 480SL	Isopropil amina glifosat	5000	III		with broad rrow leaf	
		Bilon	Trikopir Butoksi Etil Ester 670 g/l	2733	III	Weeds	with broadleaf	
		Scheme	Smallholder					
		ingredient During Jai	e audit, sighted the list s) that can used by s nuary 2023 – June 202 redients methyl metsu usage.	mallhol 24, the	der nam smallhol	ely methyl ders used p	metsulfuron pesticide witl	1
7.2.2	<b>(C)</b> Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per Ha and number of applications) are provided.	based on	holder has showed th amount of pesticide the LD50 of each pes	used. F	or exam	nple, Buata	n Estate ha	•
	- Critical (Major) compliance -	Januari –	December 2023					
		Brand	Active Ingredient	LD50	Total Used	Total Active Ingredient	Ratio Active Ingredient/ Ha	
		Meta Prima	Methyl metsulfuron	5000	371,204 gr	74,241	0.2193	
		Biolon	Trikopir Butoksi Etil Ester 670 g/l	2733	101 gr	81	1.8526	
		Supremo 480SL	Isopropil amina glifosat	5000	4,641	5	0.0030	
				•	,			

7.2.3	(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.  - Critical (Major) compliance -  Based on interview with IPM supervisor and smallholder representatives known that no outbreak that causes pesticide usage.				
7.2.4	There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in Indonesia best practice guidelines.  - Minor compliance -	s, as identified in Indonesia best practice guidelines. immature area to prevent pest infestation. For example, there was a			
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.	Based on the document verification and interview with management - during ASA-2.3, 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). According to bin card in chemical store obtained information of pesticide list that usually used with active ingredients such as isopropyl amine glyphosate, fluoroksifir, methyl metsulfuron, triklofir, diuron, paraquat diklorida, diuron, and lamda sihalotrin. Certificate holder no longer using paraquat since 15 November 2019, according to the circular letter of Deputy Managing Director No. 008/DMD/MEMO/OCT/19 dated 22 October 2019.  To reduce the human and environmental risk, there is some continuous action that has been implemented as follows:	Complied		

	<ul> <li>Set up the pesticide rotation. For example, chemical weeding rotation is 4 times a year where the rotation in immature and early mature more often than mature and old palm.</li> <li>Using the ultralow volume nozzle to minimize water consumption and reduce the risk for environment. During the field visit to the pesticide store sighted the micron herby system knapsack as example.</li> <li>Conducted regularly training for pesticide applicator and equipped them with appropriate PPE's.</li> <li>Delaying the pesticide if weed or pest is under control. According to the interview with estate manager obtain information that the pesticide rotation can be delayed or reduced especially in mature or old palm where weeds/pest population are under control.</li> <li>Minimalize contamination for pesticide applicator and their families by ensuring them to clean themselves before back home.</li> <li>Based on a field visit to the Pesticides Storage - there was no paraquat in place. And based on interviews with sample of smallholder, the pesticides application was carried out by TUS (Tim Unit Semprot) that provided by the Company.</li> </ul>
7.2.5b Why there is no other alternative which can be used.	Certificate holder has showed the record of LD50 calculation in each unit based on amount of pesticide used. For example, Buatan Estate has calculated the LD50 of each pesticide in a monthly basis.
7.2.5c Which process was applied to verify why there is no other less hazardous alternative.	Until this recertification audit obtains information that there is no pesticide use for control pest attack. All of pesticide only using for weeding (herbicide).
	Based on interview with field assistant and smallholder representatives known that no outbreak that causes pesticide usage.



	7.2.5d Process to limit the negative impacts of the application.	Based on document verification, interview and field observation obtained information that there is no record of negative impact related to the pesticide application.	
	7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.	Based on goods in and goods out data in pesticide store, obtained information that the certificate holder used some kind of pesticide (different active ingredients). There is only paraquat dichloride that listed as WHO Class II (Moderately Hazardous). As described in this indicator, the company no longer using paraquat dichloride since November 2019.  There is no use of other pesticide class 1A and 1B until the audit.	
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.  - Critical (Major) compliance -	Based document review and interview to the management during ASA2.3, it was known that PT Inti Indosawit Subur – Buatan Group has assigned chemical weeding team (Tim Unit Semprot/TUS) 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
		Based on document review and interview with random pesticide applicator known that they were attending the last training on pesticide handling on 12 February 2024. Some topics that discuss such as refresh for safety pesticide handling, national regulation related to pesticide, symbol and label awareness and emergency procedure if any contamination or poisonous and the importance of MCU for applicator.	
		Based on interview to the spraying activity at Block A91z Afd-I revealed that the worker can describe purpose of PPE usage, attending regularly medical check and safety working procedures.	
		Workers that perform herbicide spraying in Buatan Estate also 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 ASA2.3, auditor team has also interviewed sample of smallholder representatives in KUD Bhakti Mandiri, KUD Jaya Makmur, KUD Sumber Rejeki and KUD Sejahtera, 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, the last training has conducted on 12 February 2024.	
7.2.7	(C) Storage of all pesticides in accordance with recognized best practices Critical (Major) compliance -	PT Inti Indosawit Subur has a pesticide storage. Location of the pesticide storage in Buatan Estate.  Pesticides are always applied in accordance with the product label and storage instruction. Agrochemical's storage was locked in areas with limited access. The storage was ventilated. 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. The possible spillage was managed. Secondary containment was provided around the chemical storage area. Spill kit was also provided in the area. 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.	Complied



		Based on a field visit to the Pesticides Storage during ASA2.3, there was found that:  • Permanent Buildings. • A good ventilation. • Permanent floor is cemented, the floor of the mixing of pesticides using ceramics, and equipped with a "spillage trap", • Eye wash shower, first aid box, PPE and Fire extinguisher are provided and well functioned and tested regularly (monthly) • PPE room. • Operation control: MSDS are available for all types of existing pesticides and he pesticide management and safety instructions are available. • A package management/ used pesticide package is available. • Water wash of pesticides containers collected in "spillage trap". • 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. • There was no paraquat in place.  All waste products have been identified and documented under the "Evaluasi Aspek-Dampak Lingkungan" (Environmental Aspect impacts). Domestic waste is the main concern to be manage. Both Mill and Estate, has periodically schedule to manage the domestic waste.	
7.2.8	All pesticide containers that are disposed of and/or used for other purposes are managed according to applicable regulations and/or instructions on the packaging.  - Minor compliance -	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:	Complied

		<ul> <li>Transported on 27 March 2024</li> <li>Manifest Festronik No. KLHK-1720180767 – used oil; hazardous waste code: B105d.</li> <li>Manifest Festronik No. KLHK-1720181364 – used hazardous waste container; hazardous waste code: B104d.</li> <li>Manifest Festronik No. KLHK-1720181285 – used battery; hazardous waste code: A102d.</li> <li>Manifest Festronik No. KLHK-1720180871 – used rags; hazardous waste code: B110d.</li> </ul> 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 at KUD Jaya Makmur, KUD Sejahtera, KUD Sumber Rejeki and KUD Bhakti Mandiri, they were well aware of the to manage the waste from ex fertilizer sack and empty chemical.	
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 -	Based on interview with sustainability staff and field visit confirmed that there is no aerial spraying pesticide performed by PT Inti Indosawit Subur – Buatan Estate.	Complied
7.2.10	<b>(C)</b> Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.	Buatan Estate & Scheme Smallholder:	Complied

	- Critical (Major) compliance -	Based on document review it was known that annual medical check-up was conducted for all workers handling with chemical, such as pesticide, herbicide, and fertilizer.		
		Report of MCU for all workers in Estate, was conducted by "Klinik Asian Agri Sehat Buatan", dated 17 June 2024 was attended by 80 sprayer and manuring workers. The MCU covered urine test, HSaAg and physical test.		
		Medical examination for smallholder's pesticide operator is include with Estate, because those chemical/spraying operators are work at Estate and Smallholders area. Sample: KUD Bhakti Mandiri, KUD Jaya Makmur, KUD Sumber Rejeki and KUD Sejahtera.		
7.2.11	<b>(C)</b> 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.	PT Inti Indosawit Subur – Buatan Group prohibits pregnant or breast-feeding women to perform chemical spraying. In order to mitigate, estate performed monthly pregnancy test.	Complied	
	- Critical (Major) compliance -	PT Inti Indosawit Subur – Buatan I POM has kept the record that spraying is not conducted by pregnant or breast-feeding women. The company has been conducting PP Test (pregnant test) every month.		
		The last of pregnancy test conducted in 19 June 2024. Based on document review and interview to the sprayer workers during ASA 2.3 it was known that all the female sprayers in well condition and not being pregnant nor breast feeding.		
Note For	7.2.11			
mills on the	Referring to Act No. 13 of 2003 concerning Manpower, Act No. 35 of 2014 concerning Child Protection, and taking into account the risks of hazards on palm oil plantations and mills on the development and physical, mental and social health of children, the national interpretation mandates that the unit of certifications does not employ people under the age of 18 for pesticide spraying. For this reason, the provisions of young workers under 18 years in indicator 7.2.11 are irrelevant.			
Criteria :	Criteria 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.			
7.3.1	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is		Complied	

	documented and implemented in accordance with applicable laws and regulations.  - Minor compliance -	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.	
		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.	
7.3.2	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.  - Minor compliance -	The hazardous waste is sent to the registered collector/transporter which is approved by the Environmental Ministry. Document of agreements and third parties' licenses:	Complied
	1 mor compliance	• 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 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 agreement period starts from 1 January 2023 – 31 December 2024.
- 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.

		,	
		Based on interview with smallholder representatives obtain information that they only using fertilizer according to the recommendation from Asian Agri's Research and Development Department. No fertilizer applied in riparian area to minimize environmental impact.	
		During the field visit at Block B19i Afdeling 2 known that the management unit has applied fertilizer according to the fertilizer's recommendation issued by Asian Agri Research and Development Department. Based on field visit in lock B19i Afdeling 2 using NPK with dosage 1.5 kg/palm (this is in accordance with fertilizer's recommendation 2023).	
		In addition, management unit also applied EFB application especially in new planting and immature areas to maintain soil fertility, maintain soil moisture and reducing weed. Based on field visit in Block B19i Afdeling 2, auditor has verified the EFB application in immature area with dosage 30 ton/Ha/year.	
		Based on interview with smallholders, most of their plots is no longer applied with fertilizer due to in replanting preparation.	
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 Instruction has explained that the soil sampling is conducted every 6 years and the document valid for 7 years.	Complied
		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 5 October 2017. Parameter that tested is N, C, K, Ca, Mg and pH. Verified samples:	
		<ul> <li>P1, location Block B91d, Division II, No Lab. 15S2666-15S2669.</li> <li>P2, location Block B91b, Division II, No Lab. 15S2670-15S2674.</li> </ul>	



		<ul> <li>P3, location Block A91c, Division II, No Lab. 15S2675-15S2679.</li> <li>P3, location Block A91c, Division II, No Lab. 15S2675-15S2679.</li> <li>The last leaf sampling conducted on 22 April 2024. Parameter that</li> </ul>	
		tested is major element (Ash, N, P, K Mg, Ca) dan Minor element (B, Cu, Zn, Mn, Fe). Verified samples as follows:	
		<ul> <li>Ref Order No. 101/LSU-AGR/04/2024 YoP 2019, dated 22/04/2024, location Afd II, 25 samples.</li> </ul>	
		<ul> <li>Ref Order No. 102/LSU-AGR/04/2024 YoP 2018, dated 22/04/2024, location Afd II, 23 samples.</li> </ul>	
		• Ref Order No. 100/LSU-AGR/04/2024 YoP 2019, dated 22/04/2024, location Afd I, 12 samples.	
		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 2025.	
7.4.3	A nutrient recycling strategy is in place, which include the recycling of	Buatan Estate & Scheme Smallholder:	Complied
	Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.  - Minor compliance -	Based on document review during ASA2.3, certificate holder has had a guidance in organic fertilizers such as Empty Fruit Bunch (EFB) and Palm Oil Mill Effluent (POME) according to Agricultural Policy Manual. Certificate holder has implemented EFB application in estate with dosage $30-50$ ton/Ha in normal soil and POME with dosage $750$ m3/Ha in Buatan Estate.	
		According to the interview with smallholder representatives, currently there is no longer EFB application since their area has planned to be replanting.	
		During the audit known that the management unit has applied fertilizer according to the fertilizer's recommendation issued by Asian Agri Research and Development Department. Based on field visit in Block	



		is in accordance In addition, ma new planting ar moisture and re 2, auditor has v 30 ton/Ha/year Based on interv	view with smallholders,	nendation 2023). lied EFB application aintain soil fertility, i field visit in Block I on in immature area most of their plots	especially in maintain soil B19i Afdeling with dosage is no longer	
		applied with fer	tilizer due to in replanti	ng preparation in 20	)23 – 2024.	
7.4.4	Records of fertilizer inputs are maintained Minor compliance -	visual analysis,	eaf sampling analysis, s , planting material, p roposing the Fertilizer R	lanting age and r		
		Fertilizer Recon	nmendation and realiza	tion for year 2023	and 2024 of	
		Buatan Estate:		·		
		Fertilizer	Recommendation	Realization	%	
			(Kg)	(Kg)		
		2023				
		ZA	643,821	643,821	100	
		AC	-	-	-	
		RP	351,133	367,897	105	
		Kieserite	10,850	21160	195	
		Dolomite	362,557	363,558	100	
		HGFB	44,642	47,592	107	
		NPK	111497	197,686	177	
		MOP	858873	858873	100	
		Urea	658803	309944	47	
		2024 (Janua		24.000	F0/	
		RP TA A C	504,135	24,000	5%	
		ZA-AC	612,966	575,492	94	
		Dolomite	602036	366704	61	



I	HGFB	45,932	-	-
	Hi-KEY	29,304	29,306	100
	MOP	510,645	510,645	100

#### Scheme smallholder:

Based on interview with the Plasma Manager and document review during ASA2.3, it was known that for the KUD which will conduct the replanting, the Plasma Manager has established Memorandum No. 02/ES-KLB/MEMO/12/2022 dated 21 December 2022 for Pengurus KUD and KT Kebun Plasma Buatan related to "Kebijakan Aplikasi Pupuk Petani Plasma Buatan", the Memo was explained for fertilizer application can be eliminated 1-2 years before replanting. However, if there are farmers who will continue to apply fertilizer, then for the dosage/tree you can refer to this recommendation, namely ZA/AC, MOP, RP and Dolomite with dosage 1Kg/tree with rotation 1 time per year.

For the KUD that was conducted replanting and in immature period, the record of fertilizer as follows:

#### 2024 (until June)

	202 i (antil balle)		
	KUD Bhakti Mandiri		
	ZA.	Program (Kg)	271,076
		Actual (Kg)	136,228
	RP	Program (Kg)	137,857
	N	Actual (Kg)	137,853
	MOP	Program (Kg)	199,202
	1101	Actual (Kg)	104,807
	Dolomite	Program (Kg)	53,442



	- Critical (Major) compliance -	Analysis in PT Inti In October – December	dosawit Subur – Buata 2008. Reported under	an Estate carried out in "Laporan Survey Tanah ti Indosawit Subur Kebun	
7.5.1	<b>(C)</b> Maps that identify marginal and fragile soils, including steep sloped land are available.		view during ASA23 its	was known that Soil Map	Complied
Criteria	<b>7.5:</b> Practices minimise and control erosion and degradation of soils.				
				<u>,                                      </u>	
			Actual (Kg)	1,734	
		HGFB	Program (Kg)	1,734	
		Doionnice	Actual (Kg)	34,545	
		Dolomite	Program (Kg)	34,545	
		MOP	Actual (Kg)	49,209	
		MOP	Program (Kg)	93,624	
			Actual (Kg)	67,257	
		RP	Program (Kg)	67,257	
			Actual (Kg)	64,860	
		ZA	Program (Kg)	128,310	
		KUD Jaya Makmur			
		HGFB	Actual (Kg)	3,293	
		LIGER	Program (Kg)	3,293	
			Actual (Kg)	53,442	



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.

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".

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 (OP 2021 for Estate and OP 2020 for scheme smallholder) known that the management unit has provide terrace contour. There is no fire usage during that process.	Complied
		The management unit also provide legume cover crop to minimize the soil erosion, it was shown during field visit at estate and scheme smallholder	
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 Buatan Estate.	Complied
<b>Criteria</b> operation	<b>7.6:</b> Soil surveys and topographic information are used for site planning ins.	n the establishment of new plantings, and the results are incorporated	into 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 -	There are no changes compared to last audit.  Based on document review during ASA2.3, it was known that Certificate holder through Agri Agri's Research and Development Department has conducted soil mapping 2010. They also had SOP AA-APM-OP-1100.05-R3 dated 23 November 2016: Konservasi Tanah dan Air (Soil & Water Conservation) as guidance for soil conservation in each topography. The document is still valid until now.  There is no marginal soil within the certified area of PT Inti Indosawit Subur — Buatan Estate and Buatan Scheme smallholder (Plasma) in accordance with Soil Analysis Report carried out by R & D in December 2008. It was also confirmed during onsite audit to Buatan Estate and Scheme Smallholder.	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 -	There are no changes compared to last audit.  There is no marginal soil within the certified area of PT Inti Indosawit Subur – Buatan Estate and Buatan Scheme smallholder (Plasma) in accordance with Soil Analysis Report carried out by R & D in December	Complied



		2008. It was also confirmed during onsite audit to Buatan Estate and Scheme Smallholder.	
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.  - Minor compliance -	There are no changes compared to last audit.  There is no marginal soil within the certified area of PT Inti Indosawit Subur — Buatan Estate and Buatan Scheme smallholder (Plasma)in accordance with Soil Analysis Report carried out by R & D in December 2008. It was also confirmed during onsite audit to Buatan Estate and Scheme Smallholder.	Complied
Criteria	<b>7.7:</b> 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 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 "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 to hilly. Natural fertility is 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 Buatan Estate and Buatan Plasma areas, there is no indication of peat land.	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 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 "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 to hilly. Natural fertility is low to medium. The entire area of the scope certification is a mineral land. There was no peat soil in the operational area.	Complied

		Based on the results of field observations by the auditor in the Buatan Estate and Buatan Plasma areas, there is no indication of peat land.	
	<b>DURAL NOTE:</b> Maps and other documentation for peatlands are provided, audit 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 "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 to hilly. Natural fertility is 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 Buatan Estate and Buatan Plasma areas, there is no indication of peat land.	Complied
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 "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 to hilly. Natural fertility is 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 Buatan Estate and Buatan Plasma areas, there is no indication of peat land.	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	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 "Laporan Survey"	Complied



	provisions of the RSPO Drainability Assessment Procedure) before replanting. The results of the assessment are used to determine the period of replanting to be carried out, as well as to gradually replace oil palm cultivation for at least 40 years or two cycles, (whichever is longer), before reaching the natural gravitational drainage limit for peat. If oil palm is gradually replaced, it is replaced by other commodity crops that are better suited for higher groundwater levels (paludiculture) or rehabilitated with natural vegetation.  - Critical (Major) compliance -	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. 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 Buatan Estate and Buatan Plasma areas, there is no indication of peat land.	
currently to and will in unit of cert units that The unit o	being adjusted / tested by the RSPO Working Group on Peatlands (Peatland clude additional Guide on the steps to be followed after deciding not to restification concerned. It is recommended that the trial methodology period is purely have plantations on peat) to utilize the methodology and provide input to F	ment Guide along with related concepts and detailed actions is contained in the Working Group / PLWG). The final version must obtain PLWG approval in Jupiant and the consequences for other stakeholders, farmers, local communitariopsed to be extended for 12 months for all relevant management units (ie relevant existing procedures can be further refined as needed before Jackies Guidelines for the guidelines. Additional guidance for alternative communications.	lanuary 2019 ities, and the management anuary 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, where Based on Soil Analysis carried out by R & D on December 2008 in Buatan 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 to hilly. Natural fertility is 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 Buatan Estate and Buatan Plasma areas, there is no indication of peat land.	Complied
7.7.7	<b>(C)</b> 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	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 "Laporan Survey	Complied

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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 -

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. 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 Buatan Estate and Buatan Plasma areas, there is no indication of peat land.

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

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.

There are no changes of water management plan because it has refer to Environment Report (RKL RPL) and HCV Area Management.

The company has implemented a water management plan consisting of:

- Do not apply chemicals in river border areas
- Do not dispose of liquid waste into the river but reuse it on plantation land. Before being used, the liquid waste is managed at the WWTP so that the quality meets the standards set by the government.
- Utilizing water for factory processing in accordance with the standards set by the company.
- Conduct river water quality testing.

Based on field observations on the Buatan I Estate and Buatan Plasma, the company has managed water sources by installing signboards with signboards as HCV areas and painting on palm trees as signs. spray limits, and planting timber plants on the river border even though the river border area is included in the planted area.

The company has a surface water quality monitoring program conducted every semester by an accredited laboratory (PT ITEC Solution

Complied

		Indonesia) on 23 November 2023. The monitoring location is on a river for the scope of the company's operational area, namely the Kerinci Hulu and Hilir Rivers. 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 with certificate analysis Number: D.09.2923-1/LHU/2023 dated 9 October 2023, location in Buatan I POM, 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 of Kerinci River – Buatan I Estate, 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 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) is monitored in accordance with applicable regulations.  - Minor compliance -	In this ASA 2.3 there are no changes in effluent treatment.  Buatan I POM, there are 10 ponds in effluent treatment system which consists of Colling Pond, Primary Anaerobic Pond, Secondary Anaerobic Pond, Acidification Pond, and Buffering pond. The company already has a permit for the use of liquid waste for Land Application (LA) with number KTPS.503/DMPTSP-LA/2019/04 valid till 26 August 2024. Total area of land application covers 679 hectares at Block B and C.  Buatan I POM has been installed at a Biogas power plant since 2015 to generate electrical power methane. The biogas system has Anaerobic MBR system thorugh digester Thermophilic fermentation, and anaerobic membrane tank.  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	Complied
		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".	
		Analysis period January – June 2024	



		1	1			1	ı	
Parar eter	n Unit	Thres hold	Jan	Feb	Mar	Apr	May	Jun
рН	-	6-9	7.70	7.55	7.70	7.63	7.57	7.72
BOD	mg/l	<5,00 0	1450. 16	1337.1 5	1425. 41	1227. 93	1482. 31	1325. 96
COD	mg/l	-	3971. 63	3848.1 9	3963. 17	3746. 12	3514. 59	3510. 72
Fat and Oil	mg/l	-	30.50	28.20	34.10	32.48	24.70	21.30
Cd	mg/l	-	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
Cu	mg/l	-	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
Pb	mg/l	-	<0.06	<0.06	<0.06	<0.06	<0.06	<0.06
Zn	mg/l	-	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02
Parar eter	n Unit	Thres hold	Jul	Aug	Sep	Oct	Nov	Dec
pH	-	6-9	7.30	7.10	7.80	7.50	7.60	7.50
BOD	mg/l	<5,00 0	1329. 41	1517.2 5	1743. 09	1511. 89	1627. 18	1596. 11
COD	mg/l	-	3873. 11	4011.6 3	3925. 73	3857. 63	4549. 53	3797. 28
Fat and Oil	mg/l	-	17.46	25.90	23.20	19.84	31.42	20.44
	mg/l	_	< 0.01	<0.01	<0.01	< 0.01	<0.01	<0.01
Cd	9/ .							1



		П.					Ī				
		Pb	mg/l	-	<0.06	<0.06	<0.06	<0.06	<0.06	<0.06	
		Zn	mg/l	-	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	
									•		
		Based o	n the re	sculte of	field of	nconvatio	nc in th	o Land	Applicat	ion area	
										n of the	
			•			•				location	
										dication	
										ations at	
										P, there	
										age and	
										nount of	
		-			s into	the ap	olication	land	ıs availa	ble and	
		function	ing prop	periy.							
7.8.4	Mill water use per tonne of FFB is monitored and recorded.			•	•	_				e record	Complied
	- Minor compliance -									h by the	
							of wate	r use p	per ton c	f FFB is	
		present			-	2:					
		January – December 2023									
		D.	eriod		FFB		ater Us	_	Rati	_	
			er iou	(1	tonnes	)	(m³)	(	(m³/ton	_	
		Januar	У		13,208		9,426		0.7		
		Februa	iry		13,859		9,940		0.72		
		March			12,340		8,011		0.65		
		April			10,043		6,831		0.68		
		May			17,711		11,442		0.65		
1							10766				
		June			15,342		10,266		0.67		
		July	L		18,634		11,495		0.62	2	
										5	

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	October	18,484	11,782	0.64		
	November	17,288	11,113	0.64		
	December	11,054	7,900	0.71		
	TOTAL	180,754	120,191	0.66		
	January – June	2024				
	Period	FFB (tonnes)	Water Usage (m³)	Ratio (m³/ton FFB)		
	January	` `	` '	· · · ·		
	February	91,129	5,932	0.07		
	March	12,854	10,769	0.84		
	April	17,711	13,380	0.76		
	May	19,955	14,807	0.74		
	June	20,104	14,226	0.71		
	TOTAL	171,968	66,162	0.38		
	The company can month.	also show proof	of payment for sur	face water for each		
7.9: Efficiency of fossil fuel use and the use of renewable energy is optimise	ed					
Plans to increase the efficiency of fossil fuel use and to optimize renewable energy are available, monitored and documented.  - Minor compliance -	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.					
	Plans to increase the efficiency of fossil fuel use and to optimize renewable energy are available, monitored and documented.	November December TOTAL  January – June  Period  January February March April May June TOTAL  The company can month.  7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised  Plans to increase the efficiency of fossil fuel use and to optimize renewable energy are available, monitored and documented Minor compliance -  To improving efficiency of fossil fuel use and to optimize renewable energy are consumed into operational purpor	November 17,288 December 11,054 TOTAL 180,754    December 11,054   December 11,054   December 11,054   TOTAL 180,754    December 11,054   TOTAL 10,215   February 91,129   March 12,854   April 17,711   May 19,955   June 20,104   TOTAL 171,968    The company can also show proof month.    Plans to increase the efficiency of fossil fuel use and to optimize renewable energy are available, monitored and documented.   Minor compliance - To improving efficiency of the use of fossil fuels. Fossil fuel record show. Energy use records in renewable energy use per ton of a re consumed internally as boiler operational purpose, including the	November 17,288 11,113 December 11,054 7,900 TOTAL 180,754 120,191    January - June 2024   Period   FFB (tonnes) (m³)   January   10,215 7,048     February   91,129 5,932     March   12,854 10,769     April   17,711 13,380     May   19,955 14,807     June   20,104 14,226     TOTAL   171,968   66,162     The company can also show proof of payment for sur month.  7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised     Plans to increase the efficiency of fossil fuel use and to optimize renewable energy are available, monitored and documented.   - Minor compliance -	November   17,288   11,113   0.64     December   11,054   7,900   0.71     TOTAL   180,754   120,191   0.66      January - June 2024   Period   FFB   Water Usage (m³) (m³/ton FFB)     January   10,215   7,048   0.69     February   91,129   5,932   0.07     March   12,854   10,769   0.84     April   17,711   13,380   0.76     May   19,955   14,807   0.74     June   20,104   14,226   0.71     TOTAL   171,968   66,162   0.38      The company can also show proof of payment for surface water for each month.    To improving efficiency of the use of fossil fuel use and to optimize renewable energy are available, monitored and documented.     - Minor compliance -   To improving efficiency of the use of fossil fuels such monitoring on use of fossil fuel such monitoring on use of fossil fu	

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

No	By-product	Amount (Ton)	Use for
1	EFB	1,679	Application in estate
2	Fiber	1,362	Boiler fuel
3	Shell	467	Boiler fuel

#### Records of EFB, fiber and shell in 2024 (January – Junel)

No	By-product	Amount (Ton)	Use for
1	EFB	12,035	Application in estate
2	Fiber	11,080	Boiler fuel
3	Shell	2,278	Boiler fuel

#### Fossil fuel consumption in 2023 (January – December)

No	Unit	Fuels (ltr)	Use for
1	Estate	137,182	Operational activities
2	Mill	49,505	Operational activities

#### Fossil fuel consumption in 2024 (January – April)

No	Year	Fuels (ltr)	Use for
1	Estate	64,034	Operational activities
2	Mill	13,914	Operational activities

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

7.10.1 **(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.

- Critical (Major) compliance -

PT Inti Indosawit Subur – Buatan I POM has identified the emission sources and pollution under document of "Environmental Aspect-Impacts (Evaluasi Aspek-Dampak Lingkungan) year 2023".

Identification of greenhouse gas (GHG) emissions sources both of Mill, Estate and Smallholders consist of emission from boiler and generator, effluent from mill wastewater, particulate from boiler stack, noise, fertilizer application, fossil fuels usage, transport of FFB

The assessment of pollution activities was documented in "Mitigasi Has Rumah Kaca". All the activities of mill and estate as well as the waste generated has been well documented, for examples the operational activity from generator is generates air emissions, the company 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 2023". 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 Complied



		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, steam and chemical pollution, from the engine room it produces pollution in the form of noise.	Complied
		Efforts to reduce pollutants carried out by the company include:	
		Monitoring air quality and emissions from boilers and generators  Managa POME in MA/TPa before use in plantations.	
		<ul> <li>Manage POME in WWTPs before use in plantations</li> <li>Utilizing POME for Methane Capture (Biogas) which generates electrical energy.</li> </ul>	
		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</i>	



		<ul> <li>Lingkungan Hidup dan Kehutanan Republik Indonesia No. 11 Tahun 2021).</li> <li>The company also has mitigation as an effort to reduce GHG emissions, such as:</li> <li>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.</li> <li>Use of fibre and shells for boiler fuel as a substitute for fossil fuels</li> <li>Conduct environmental emission testing to determine repair schedule</li> <li>Prohibition of burning waste for residential areas.</li> <li>Planting trees that are useful for capturing carbon gas produced from factories</li> <li>Perform regular vehicle repairs and monitoring.</li> </ul>	
7.11.1	<b>7.11:</b> Fire is not used for preparing land and is prevented in the managed a <b>(C)</b> 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 -	<ul> <li>In determining land fire prevention and control measures, the company carries out several activities, namely:</li> <li>Rainfall monitoring and establishment of a fire hazard rating system every month.</li> <li>Monthly monitoring of hotspots.</li> <li>Implementation of basic fire introduction training o</li> <li>The company has an emergency response team to handle fire</li> </ul>	Complied



		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 "Laporan Pencegahan Pencemaran dan atau Kerusakan Lingkungan Hidup Yang Berkaitan Dengan Kebakaran Lahan SM II 2023 PT Inti Indosawit Subur – Group Buatan" sent to Environmental Agency of Pelalawan Regency.	
		The auditor team has also carried out fire control simulations for the fire task force teams at Buatan I.estate and Buatan POM and tested the fire control facilities and infrastructure owned by the company on 24 July 2024. The simulation results show that the Company's fire team can run the simulation well and firefighting equipment can be used at any time.	
7.11.3	The unit of certification engages stakeholders in adjacent locations for fire prevention and control measures.  - Minor compliance -	The company has also involved stakeholders in adjoining locations for fire prevention and control measures by conducting socialization of land fire control to the community which were attended by communities around the company such as Bukti Agung Village and Makmur Village. The results of interviews with representatives of the village community around the company revealed that the company had socialized fire control to the community. In addition, in the operational certified area there is also a signboard prohibiting land burning activities and the dangers of land fires.	Complied

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



#### **PROCEDURAL NOTE for 7.12:**

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

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

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

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

The development of this procedure will be guided by the No Deforestation Joint Steering Group (NDJSG) between the RSPO and HCSA members. In HFCC countries, RSPO will work with governments, communities and other stakeholders to develop this procedure through participatory processes at national and regional levels. The duration of this activity is specified in the Terms of Reference for NDJSG and is publicly available.

7.12.1	(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCV or HCS forests.  Historical analysis of Land Use Change Analysis (LUCA) is carried out before any new land clearing, in accordance with the RSPO LUCA Guidance document (see indicator 7.12.2).  - Critical (Major) compliance -	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 progress. Replanting has been started since 2014 – 2023 and still continue until 2024.	Complied
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 ( $previously\ was\ division\ IV,\ V,\ VI\ and\ VII\ currently\ changing\ to\ become\ division\ I-IV)$  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);
- HCV 1.2 and HCV 6: Conservation forest for Manggeris trees (Pohon Madu): 10.5 Ha;
- HCV 1.2 and HCV 6: Conservation forest for Manggeris trees (Pohon Madu): 3.60 Ha;
- HCV 6: ancient graveyard: 0.66 Ha;

HCV identification was consulted to the relevant stakeholder and HCV maps is available and in place. HCV assessment also including Buatan Smallholder area and used in scheme smallholder operation.

The HCV identification document has explained the general condition of landscape surrounding company's plantation: there is no protected forest/ecosystem that feasible for wildlife to maintain its viability. Therefore no recommendation for wildlife corridor.

	7.12.2 b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the latest HCSA Toolkit and HCV-HCSA Assessment Manual that is applicable at the time of the assessment. This includes stakeholder consultation and take into account wider landscape- level consideration.	There is no new 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	<b>(C)</b> In High Forest Cover Landscapes (HFCLs) within HFCCs, a specific procedure will apply for legacy cases and development by indigenous peoples and local communities with legal or customary rights, taking into consideration regional and national multi-stakeholder processes. Until this procedure is developed and endorsed, 7.12.2 applies.  - 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
	URAL NOTE for 7.12.3:		
Indicator	7.12.3. is not relevant to Indonesia, until further decisions by the RSPO.		
7.12.4	(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An Integrated management plans to protect and/or enhance HCV and HCS forests, peatland and other conservation areas 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 -	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.  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.	Complied

		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 (previously was division IV, V, VI and VII currently changing to become division I - IV) 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 1.2 and HCV 6: Conservation forest for Manggeris trees (Pohon Madu): 10.5 Ha;  HCV 1.2 and HCV 6: Conservation forest for Manggeris trees (Pohon Madu): 3.60 Ha;  HCV identification was consulted to the relevant stakeholder and HCV maps is available and in place. HCV assessment also including Buatan Smallholder area and used in scheme smallholder operation.  The HCV identification document has explained the general condition of landscape surrounding company's plantation: there is no protected forestyleses where the forestylese registering its visibility.	
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	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	Complied



	negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.  - Minor compliance -	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.	
7.12.6	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 March 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
	- 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 I 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. Based on HCV Monitoring Report Period July – December 2023, it was found several wildlife species such as <i>kucica kampung, kareo padi, kekep babi, cekakak belukar, raja-udang meninting, kepudang luduk-hitam; monyet ekor-panjang, bajing kelapa, babi hutan; biawak, kobra dan kadal.</i>	
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 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.	Complied
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 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.	Complied



#### **Appendix B: GHG Reporting Executive Summary**

The GHG emissions that were produced in **2023** for **Buatan I POM** 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 **Buatan I POM** and supply base are as following:

Emission per product	tCO₂e/tProduct
СРО	-0.26
РКО	-0.26

Extraction	%
OER	18.2
KER	5.56

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

Land Use	На
OP Planted Area	3621.00
OP Planted on peat	0.00
Conservation (forested)	0.00
Conservation (non-forested)	0.00
Total	3621.00

#### **Summary of Field Emission and Sink**

	Own Crop*		Group		3 <sup>rd</sup> Party		Total	
	tCO₂e	tCO₂e / FFB	tCO₂e	tCO₂e / FFB	tCO₂e	tCO₂e / FFB	tCO₂e	tCO₂e / FFB
Emission			•		•			
Land Conversion	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
CO <sub>2</sub> Emission from fertilizer	0.00	0.00	910.12	0.02	0.00	0.00	910.12	0.02
NO <sub>2</sub> Emission from peat	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
NO <sub>2</sub> Emission from fertilizer	0.00	0.00	763.28	0.21	0.00	0.00	763.28	0.21
Fuel Consumption	0.00	0.00	710.02	0.20	0.00	0.00	710.02	0.20
Peat Oxidation	0.00	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	0.00
Conservation Sequestration	0.00	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	0.00

\*Note: Includes both estates and smallholders



#### **Summary of Mill Emission and Credit**

	tCO₂e	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

<sup>\*</sup>This mill has no kernel crusher operation.

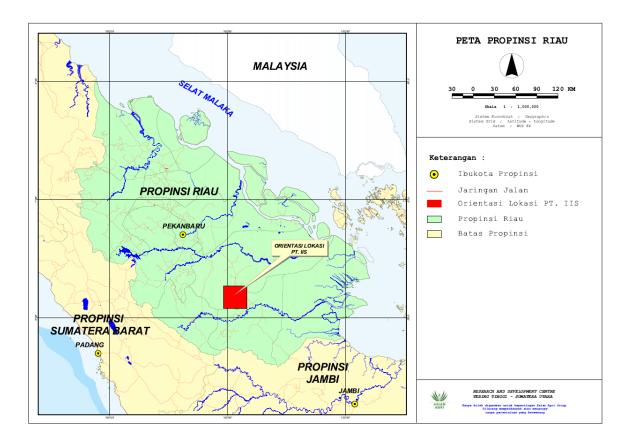
Palm Oil Mill Effluent (POME) Treatment:		
Divert to Compost (%)	0	
Divert to anaerobic diversion (%)	100	

POME Diverted to Anaerobic Digestion:		
Divert to anaerobic pond (%)	100	
Divert to methane captured (flaring) (%)	0.68	
Divert to methane captured (energy generation) (%)	99.32	



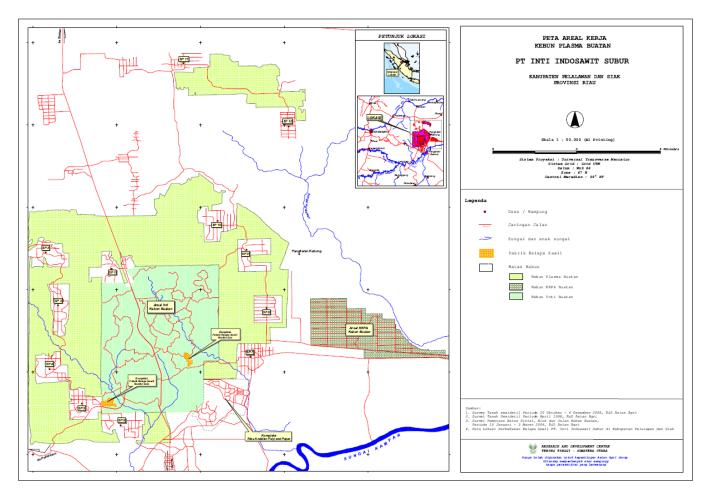
#### **Appendix C: Location Map of Certification Unit and Supply bases**







#### **Appendix D: Estate Field Map**





#### Appendix E: List of Smallholder Registered and/or sampled

Sampling Group	<b>Current Certification</b>	Scope Extension	Other: Please specify	
Risk Factor Applied	1.2 (medium risk)	Choose an item.	Choose an item.	
Justification of Risk Factor Applied	Has history of non conformances	-	-	
Number of samples	40 (√1,097 x 1.2 = 39.74)		-	
Remarks	-	-	-	

No	Name of farmer	Location	GPS Reference Area Summary (Ha)		Forecasted annual FFB Production (MT)	Date of joining	Smallholder ID		
			Latitude (N)	Longitude (E)	Total Certified Area	Planted Area			
01	Oci Sarkosi	KUD Jaya Makmur	0° 28' 5,071"	101° 48' 30,088"	2	2	13	1994	1695
02	Subandi Ali	KUD Jaya Makmur	0° 28' 5,234"	101° 48' 42,731"	2	2	13	1994	1699
03	Muhammad Soleh	KUD Jaya Makmur	0° 28' 1,997"	101° 48' 42,808"	2	2	13	1994	1700
04	Suparman	KUD Jaya Makmur	0° 27' 58,762"	101° 48' 42,775"	2	2	13	1994	1701
05	Musimin	KUD Jaya Makmur	0° 28' 43,447"	101° 48' 31,156"	2	2	23	2019	943
06	Yadi	KUD Jaya Makmur	0° 28' 30,147"	101° 48' 33,383"	2	2	23	2019	985
07	Muhadi	KUD Jaya Makmur	0° 28' 29,837"	101° 48' 36,045"	2	2	23	2019	986
08	Ngalwan	KUD Jaya Makmur	0° 28' 43,493"	101° 48' 34,353"	2	2	23	2019	944
09	Heri Sundoko	KUD Jaya Makmur	0° 28' 36,935"	101° 48' 37,499"	2	2	23	2019	971
10	Gimun	KUD Jaya Makmur	0° 28' 10,014"	101° 48' 25,322"	2	2	23	2019	1638
11	Suroso	KUD Bhakti Mandiri	0° 30' 7,697"	101° 48' 27,500"	2	2	13	1991	692
12	Wasbun	KUD Bhakti Mandiri	0° 30' 15,321"	101° 48' 46,648"	2	2	13	1991	667
13	Muladi	KUD Bhakti Mandiri	0° 30' 15,307"	101° 48' 49,940"	2	2	13	1991	668
14	Saeman	KUD Bhakti Mandiri	0° 30' 18,019"	101° 48' 41,879"	2	2	13	1991	648
15	Ahmad Sukartono	KUD Bhakti Mandiri	0°30' 21,002"	101° 48' 37,287"	2	2	22	2019	649
16	Lappo Siregar	KUD Bhakti Mandiri	0° 30' 20,636"	101° 48' 34,049"	2	2	22	2019	650
17	Saripan	KUD Bhakti Mandiri	0° 30' 14,400"	101° 48' 37,145"	2	2	22	2019	664
18	Wagino	KUD Bhakti Mandiri	0° 30' 14,948"	101° 48' 41,820"	2	2	22	2019	665
19	Tjuk Sugimin	KUD Bhakti Mandiri	0° 30' 8,739"	101° 48' 49,837"	2	2	22	2019	685
20	Guntur Hariyanto	KUD Bhakti Mandiri	0° 30' 8,490"	101° 48' 46,653"	2	2	22	2019	686
21	Jumari	KUD Sejahtera	0° 25' 15,239"	101° 49' 15,148"	2	2	15	23 Okt 1995	2626
22	Lestari	KUD Sejahtera	0° 25' 8,503"	101° 49' 9,010"	2	2	15	23 Okt 1995	2613
23	Suyanto	KUD Sejahtera	0° 25' 8,765"	101° 49' 12,101"	2	2	14	23 Okt 1995	2620
24	Kamarsyah	KUD Sejahtera	0° 25' 28,065"	101° 49' 11,918"	2	2	13	23 Okt 1995	2617
25	Muklis Ali	KUD Sejahtera	0° 25' 21,722"	101° 49' 15,149"	2	2	16	23 Okt 1995	2627
26	Suyanto	KUD Sejahtera	0° 25' 21,314"	101° 49' 8,695"	2	2	15	23 Okt 1995	2615
27	Giman	KUD Sejahtera	0° 25' 52,066"	101° 48' 4,756"	2	2	16	23 Okt 1995	2305



No	Name of farmer	Location	GPS Reference		Area Summary (Ha)		Forecasted annual FFB Production (MT)	Date of joining	Smallholder ID
			Latitude (N)	Longitude (E)	Total Certified Area	Planted Area			
28	Purwanti	KUD Sejahtera	0° 25' 44,996"	101° 48' 3,193"	2	2	15	23 Okt 1995	2349
29	Suraji	KUD Sejahtera	0° 25' 45,056"	101° 48' 5,918"	2	2	14	23 Okt 1995	2350
30	Nadirin	KUD Sejahtera	0° 25' 43,545"	101° 48′ 12,126″	2	2	15	23 Okt 1995	2352
31	Arpen Simbolon	KUD Sumber Rezeki	0° 26' 45,424"	101° 48' 39,314"	2	2	9	24 Sept 1994	2033
32	Kusmiati	KUD Sumber Rezeki	0° 26' 45,401"	101° 48' 42,622"	2	2	9	24 Sept 1994	2034
33	Dewita Sari	KUD Sumber Rezeki	0° 26' 35,011"	101° 48' 36,150"	2	2	9	24 Sept 1994	2120
34	R Suprapno	KUD Sumber Rezeki	0° 26' 35,122"	101° 48' 40,267"	2	2	11	24 Sept 1994	2121
35	Sumarlan	KUD Sumber Rezeki	0° 26' 33,032"	101° 49' 15,007"	2	2	10	24 Sept 1994	2132
36	Anton Winyoto	KUD Sumber Rezeki	0° 26' 26,395"	101° 49' 8,264"	2	2	9	24 Sept 1994	2135
37	Riaman Elyanto	KUD Sumber Rezeki	0° 26' 19,796"	101° 49' 11,573"	2	2	9	24 Sept 1994	2150
38	Saiman	KUD Sumber Rezeki	0° 26' 36,298"	101° 47' 20,189"	2	2	15	24 Sept 1994	2097
39	Meslam	KUD Sumber Rezeki	0° 26' 36,306"	101° 47' 23,245"	2	2	14	24 Sept 1994	2098
40	Karsinah	KUD Sumber Rezeki	0° 26' 29,887"	101° 47' 23,252"	2	2	14	24 Sept 1994	2167
Total			80	80	631				
	Note: * are smallholders sampled in this audit.								



#### **Appendix F: List of Abbreviations**

a.i Active Ingredient

BOD Biochemical Oxygen Demand

CB Certification Bodies

CHRA Chemical Health Risk Assessment

COD Chemical Oxygen Demand

CPO Crude Palm Oil

CSPO Certified Sustainable Palm Oil
CSPKO Certified Sustainable Palm Kernel Oil

EFB Empty Fruit Bunch

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

FFB Fresh Fruit Bunch

FPIC Free, Prior, Informed and Consent

GAP Good Agricultural Practice

GHG Greenhouse Gas

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

IP Identity Preserved

IS - CSPO Independent Smallholder Certified Sustainable Palm Oil

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

ISCC International Sustainable Carbon Certification

ISS Independent Smallholder Standard

LD50 Lethal Dose for 50 sample

MB Mass Balance

MSDS Material Safety Data Sheet

MT Metric Tonnes
OER Oil Extraction Rate

OSH Occupational Safety and Health

PK Palm Kernel
PKO Palm Kernel Oil
POM Palm Oil Mill

POME Palm Oil Mill Effluent

PPE Personal Protective Equipment
RSPO Roundtable on Sustainable Palm Oil

P&C Principles & Criteria

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

SEIA Social & Environmental Impact Assessment

SIA Social Impact Assessment SOP Standard Operating Procedure